

Application reference: *DC/25/1023*

Danefold House, Littleworth Lane, Partidge Green, West Sussex

Planning Application:

'Relocation of existing farm yard manure storage, construction of a silage clamp and construction of a slurry lagoon incorporating importation and use of materials and all associated engineering works'

Rebuttal of Landscape Character and Visual Matters in response to the Correspondence from Place Services, 20-08-25 (ref:08019) addressed to HDC

By Nick Harper BA (Hons) DipLA (Hons) CMLI (95)
On behalf of the Applicant, Danefold Farms

Ref: *hla 619 R101*
2nd September 2025

Contents

	Page
1.0 Executive Summary	3
2.0 Introduction	4
3.0 Response to correspondence from Place Services (PS) to HDC, 20-08-25	6
4.0 Conclusions	10

1.0 Executive Summary

1.1 The Executive Summary for this Rebuttal is as follows.

- Ancient Semi-Natural Woodland is not a landscape designation and shouldn't be used to define Landscape Character nor Views.
- The development would be outside the local Ancient Semi-Natural Woodland and its 15m protection buffer (Moon Wood and Furzefield Wood) and there would be no views from the PRowWs that pass through them.
- It is unclear who has written the specialist Landscape and Visual correspondence for PS, what their qualifications are and when they visited Site.
- PS's criticism of the LVIA in terms of '*topography*,' is unfounded.
- PS incorrectly '*anticipate*' that the change to *topography* would be '**Major Adverse**.'
- PS incorrectly suggest that the LVIA Visual Baseline for Viewpoints 1 to 4 have been under-scored.

2.0 Introduction

- 2.1 This Rebuttal is prepared by Nick Harper, BA (hons), DipLA (hons), CMLI (since 95), Chartered Landscape Architect and Partner of Harper Landscape Architecture LLP (HLA).
- 2.2 This document addresses the Landscape and Visual Matters raised in the Correspondence from Place Services (PS), 20-08-25 (ref:08019) to HDC.
- 2.3 This Rebuttal's responses are based on the judgements put forward in the *Landscape and Visual Impact Assessment* (LVIA), ref: *hla 630 R01* and its *Appendix 1 Viewpoints 1 to 12*, ref: *hla 630 R02*, produced by HLA, April 2025 and submitted in support of the Planning Application reference: *DC/25/1023*. Neither.
- 2.4 It is noted that HDC (and PS) have not produced an alternative Landscape and Visual Impact Assessment (LVIA) and rely solely on the HLA LVIA and its appendices. Where HDC (and PS) do not disagree with points made in the LVIA and its Appendices we must assume these are areas of Common Ground in Landscape Character and Visual terms.
- 2.5 PS put forward a 'Summary,' on page 4 of their report, this is quoted as follows.

Summary:

We have concerns regarding the landscape and visual impact of the proposals within this site. We advise additional information is submitted and the proposals reviewed, based on the comments above.

This report seeks to rebut the Landscape Character and Visual assertions made by HDC and their subconsultants (PS), where this is appropriate and a Landscape Strategy Plan (ref: *hla 619 LSP 01*) is attached. It is hoped that this is what is required in respect of the additional information.

- 2.6 This Rebuttal demonstrates that PS' LVIA concerns are unfounded. We continue to stand by the *Final Statement* of our LVIA and this is quoted as follows.

"7.6 Final statement

Only one Viewpoint (2) is judged to be Significantly changed in the long term. This is unsurprising as it is in close proximity to the new built form. It represents a short distance only, where PRow 1824 passes the heads of the new clamps. The LLCA and Viewpoints 3 and 4 would be on the Cusp of Significant and Not Significant Adverse change in the long term. The works would result in incremental and barely discernible change for all local buildings (including the Grade II Listed Bowshots) and in the winter only, otherwise the development would be entirely screened when

planting would be in leaf. As such it is clear that the adverse change would be contained within a small and limited area in and around the development only. As effects for Landscape Character at national, county and district scales, and the other 9 Viewpoints are judged to be Not Significant in the long term, it is judged that the Site is able to accommodate the type and scale of development being proposed. This is further endorsed as: the development would be discreetly located; silage clamps, FYM stores, lagoons and earthworks are commonly seen in the Low Weald agricultural landscape; the removal of the existing clamps and FYM store would be a benefit; and the recommendations of the Landscape Strategy (native planting to strengthen the historic Low Weald field pattern and biodiversity) would be a benefit. These benefits would partially offset the adverse change. As such the proposals are not contrary to Landscape. Planning Policy, as noted in the Reason for Refusal and there are good grounds for granting consent in terms of Landscape Character and Views.”

2.7 This Rebuttal responds to the *Correspondence from PS, 20-08-25 to HDC*, as follows

3.0 Response to correspondence from Place Services (PS) to HDC, 20-08-25

- 3.1 It is unclear who has written the report for PS, what their qualifications are, what Landscape and Visual Assessment Methodology they have applied for making their comments and what dates they may have visited Site

3.2 Review of the LVIA

3.3 Ancient Semi-Natural Woodland

- 3.3.1 On page 2 PS put forward the following paragraph

*“Based on the site character (Local Landscape Character Assessment, LLCA), the assessment judges a **medium value, medium-low susceptibility and medium-low sensitivity**. Considering the Site’s rural location between two woodland (one Ancient) with some recreation access, we judge that the LVIA has underassessed the sensitivity of the Site. We therefore disagree with the overall **moderate-minor adverse** effects assessed for this site.”*

- 3.3.2 Ancient Semi-Natural Woodland is not a Landscape designation. The Site is outside the Ancient Semi-Natural Woodland and its 15m protection buffer zone. Both Moon Wood and Furzefields are private although they have Public Rights of Way (PRoWs), (1830 (Moon Wood) and 1828 (Furzefield Wood)) that run through them. Both of these PRoWs were visited for the LVIA and there were no views of the Site (development) from either of them. PS rely on Ancient Woodland to justify their Landscape comments. This is an error as Ancient Semi-Natural Woodland is not a landscape designation and there are no views from the PRoWs that pass through Moon Wood nor Furzefield Wood. This significantly undermines their Landscape opinion.
- 3.3.3 PS argue that the Landscape Value, the Landscape Susceptibility and the Landscape Sensitivity are under-assessed however the LVIA is clear and detailed about how the judgements have been made and the methodology used to make these judgements. As such it is an error, by PS, to suggest ‘under-assessment,’ unless they mean under-scored. If PS mean they disagree with the Sensitivity judgement, they offer no further Landscape Baseline nor Landscape Impacts/Effects judgements to compare. As such we don’t know whether they believe the scheme is significantly changing the LLCA or not or by how much.

3.4 Topography

3.4.1 At 2.1.3 (page 6) the LVIA describes the Site as

“The Site is relatively flat and slopes from a ground level of 34.6m AOD to the east down to 28.6 to the west.”

3.4.2 At 2.2.4 (page 15) the LVIA describes the new levels as part of the proposal as follows.

“The new clamp and FYM would be approximately 4-4.5m above the existing ground levels of the field. The new earthworks would slope down from these levels to feather in with the existing ground levels. The new lagoon would be sunk below the existing ground levels with the waterside edge feathering in to the existing contours.”

3.4.3 The LVIA then goes on to describe *topography* throughout the sections describing Baseline and Impacts/Effects judgements within the LVIA documents, using it as Landscape Receptor in its own right and as combined with other Landscape Receptors. *Topography* is described at: 5.6.1.1 Visual Baseline (page 29); 6.6.1 Visual Impacts/Effects (page 32); and 7.3.1 Conclusions for Visual Impacts/Effects (page 37).

3.4.4 As such it is unclear why PS believe that *topography* has not been used as a Landscape Receptor.

3.4.5 PS then go on to ‘anticipate,’ the following

“We would anticipate that effects on the topography as a landscape receptor would be major adverse.”

However they do not state with regard to what Landscape Character scale. We would assume that this is in relation to the Local Landscape Character (LLCA), as the previous paragraph. Using Appendix A LVIA Methodology, Table 2, there are only two scenarios where a Major judgement can be made and this is when the Sensitivity is High or Very High and the Magnitude of Effect is High

For the Sensitivity to be judged High or Very High Appendix A states both

“High is defined as a Landscape likely to protected by a regional, national or international designation.”

This Site is in the Low Weald and it is not part of a designated landscape at all.

For Magnitude of Effect to be High Appendix A states

“High is defined as clearly perceptible changes, for example the loss of features which make an essential contribution to a character area, or the introduction of new large-scale features in to a character area where these are not typical, or change exerted by an overriding influence on a neighbouring character.”

The Site and LLCA is agricultural in use and character. The development would be: small scale with some change to a fairly flat, grazed field; typical of the local agricultural landscape and a congruous fit; and would cause little change to the LLCA as a whole even though this is a discreet area. As such PS' Major judgement (for *topography*) is significantly over-scoring the change and the over-arching LVIA, LLCA judgement of Minor-Moderate Adverse Effect must be preferred.

3.5 Viewpoints

3.6 Visual Susceptibility

3.6.1 On page 2 PS state concerns about the Visual Susceptibility of the LVIA judgements for Viewpoints 1 to 4. Viewpoints 1 to 4 are from PRow (1824) within the field for the new development. The rationale for the Visual Susceptibility is given in Appendix 1 and summarised (as a whole Visual Baseline description) at 5.6.1.2 of the LVIA (page 29). The types of users and the scale and type of development are described, in detail, for each Viewpoint (pages 5, 6, 7 and 8 of Appendix 1), this concurs with GLVIA 3 and as quoted in PS' correspondence (paragraph 7 page 2).

3.6.2 PS state the following

“The justification provided within Table 6b of the LVIA refers to the extent of the view that may be altered by the development proposals. We judge that this justification relates more to the magnitude of change than the susceptibility.”

Visual Susceptibility must make a general judgement about the type of Visual Receptor and the likely change or ability for the view to accommodate the type and scale of development. Magnitude of Change is more detailed and gives a measured judgement. The LVIA criteria for Visual Susceptibility is set out clearly in the methodology, applied correctly and as such it is robust and in line with Landscape Institute Guidance.

3.6.3 PS state the following

“We particularly note the magnitude of change justifications for Viewpoint 1, which refers to the development being “partially discernible above the intervening existing manure heaps.” Manure heaps are not permanent visual mitigation and will likely be moved periodically.”

Viewpoint 1 does not refer to a moveable ‘manure heap,’ alone rather it refers to a more permanent existing Farmyard Manure Store (FYM) with associated hardstanding, structures, earthworks, hedges etc (LVIA Appendix 1 (page 5)). Removal of the FYM

would be an enhancement, and this has been considered in the Magnitude of Change judgement given in the LVIA for Viewpoint 1. The LVIA Visual Baseline judgements for Viewpoint 1 are robust and have not led to lower Magnitude of Change judgements. In the subsequent paragraph (last paragraph on page 2) PS erroneously state that because of their statement for Viewpoint 1 that all Viewpoints 1 to 4 are equally under-scored despite the Visual Baseline being significantly different for Viewpoints 2 to 4 (High and Medium to High Sensitivity) from that of Viewpoint 1 (Low Sensitivity). The LVIA Visual Magnitude of Change judgements are robust and fair.

4.0 Conclusions

4.1 The following conclusions are stated.

- Ancient Semi-Natural Woodland is not a landscape designation and shouldn't be used to define Landscape Character nor Views.
- The development would be outside the local Ancient Semi-Natural Woodland and its 15m protection buffer (Moon Wood and Furzefield Wood) and there would be no views from the PRow's that pass through them.
- It is unclear who has written the specialist Landscape and Visual correspondence for PS, what their qualifications are and when they visited Site.
- PS's criticism of the LVIA in terms of '*topography*,' is unfounded as the LVIA refers to the baseline and altered topography and levels throughout.
- PS incorrectly '*anticipate*' that the change to *topography* would be **Major Adverse** however Major is defined *High or very High Visual Sensitivity* (regional, national or international designation – the Low weald is none of these) and High Magnitude of Change (LVIA states that this is the introduction of non-typical, large-scale resulting in the loss of a feature that makes an essential contribution to character – which is not the case with this congruous, small-scale development that would result in little change to the Local Landscape Character Area (LLCA)).
- PS incorrectly suggest that the Visual Baseline for Viewpoints 1 to 4 have been under-scored despite making erroneous statements about the permanence of the elements seen in Viewpoint 1. They also suggest that Viewpoints 2 to 3 have been under-scored despite the LVIA fairly judging these to be *High or Medium to High Visual Sensitivity*.