Tim Rodway

Rodway Planning Consultancy
293 Upper Shoreham Road,
Shoreham by Sea,
West Sussex, BN43 5Q

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Dear Tim

Re: Winterfold (DC/24/1787) – Rebuttal of Comments received from Horsham District Council (HDC) Landscape Consultants

Thank you for forwarding the comments from Almudena Palomar of 'ECC Place Services', HDC consultant which I have now reviewed and have the following comments:

Landscape & Visual Matters

1. I disagree with their claim that "...*submitted LVA, we found that overall, the judgements have been underestimated*" and would question whether the consultant had visited the site, as no mention of this is made within their comments and this suggest that their comments may be based on a desk-study only.
2. They reference the GLIVA 3rd edition, stating on page 122 that "...occurs when the observer sees two or more developments from one viewpoint..." I have reviewed the relevant page of the guidance; however, I cannot find this statement and would ask for clarification from the consultant. Nevertheless, I would draw your attention to page 120, paragraph 7.2 which clearly states "…*Cumulative landscape and visual effects must be considered in LVIA when it is carried our part of an EIA*…" and page 26, para 3.2 bullet point 2 states that "…*As a standalone 'appraisal' the process is informal and there is more flexibility, but the essence of the approach - specifying the nature of the proposed change or development; describing the existing landscape and the views and visual amenity in the area that may be affected; predicting the effects, although not their likely significance; and considering how those effects might be mitigated - still applies*…" therefore, it is evident that the '*Cumulative Effect*' in guidance terms is inevitably linked with the assessment of '*likely Significance*' and therefore is only relevant within an EIA.

As this project is not part of an EIA, I would question the consultant's referencing this part of the guidance and terminology which are limited to and strictly applied to, a full LVIA with an EIA.

The consultant goes on to refute my assessment of magnitude of effect in landscape terms in para 4.9 of the LVA. I have assessed the effect of the development as having a minor adverse effect which categorised in table 2 within the LVA as: "… *Slight loss or damage to existing character or features and elements, and/or the addition of new but uncharacteristic features and elements…"* which is two levels above a No Change categorisation. The consultant asserts that in their opinion that Major Adverse is more appropriate.

The description of Major Adverse in Table 2 states "…*Total loss or large-scale damage to existing character or distinctive features and elements, and/or the addition of new but uncharacteristic conspicuous features and elements*…" This does not apply to this relatively minor additional development of a rural workers dwelling when considered in the context of the existing built forms that have been previously approved. If this application were for a large housing estate, it might align with the description. Therefore, the consultant has overstated the adverse effect in magnitude terms.

This is also the same scenario in terms of the consultants' comments with regard to the LVA Table 5 where again they question my assessment of visual effect upon users of the PROWs and do not distinguish between the two separate PROWs identified within the LVA. In the LVA my assessment of Magnitude of effect of Minor Adverse equates to "…*The project, or a part of it, would be perceptible but not alter the overall balance of features and elements that comprise the existing view…"* which is applied to Footpath No 1569 and on part of Bridleway 1566 with remain section identified as be Slight Adverse. The Consultant asserts that Moderate Adverse in terms of is more suitable assessment of magnitude of effect "…*The project, or a part of it, would become the dominant feature or focal point of the view…" again* this clearly ignores the minimal scale of proposed development and the context against it need to be viewed in terms of the existing equestrian development.

3. In terms of visual scale of effect in the LVA Table 6, the consultant has the ramped up the predicted impact in visual terms to Large Adverse, which I consider cannot be professionally justified when you look at what is currently proposed within the context of the existing permitted development of the site and the removal of the mobile home.

The Proposal

4. The consultant cites HDC Planning Policy 26, noting the required landform design and the need for more details on cut and fill. These can be provided to illustrate the modest changes. The menage north of the proposed dwelling and the indoor arena are on level plateaus cut into the hillside, making the proposed embankments consistent with previous site development.

   The consultant also notes that "…*We also have concerns on the introduction of urbanising character as a result of associated elements to the new dwelling such as hard surfacing, retaining walls*…" The existing paddock is a hardstanding winter turn out paddock and the scheme will actually reduce the overall extent of hard standing by approximately 406m² where these areas will be returned back to soft landscaping.

   The consultant has also observed that we are relocating trees. These trees have not yet been planted. Regarding the comment that "the tree planting proposed to the south does not relate or integrate with the existing landscape pattern", I find it difficult to comprehend as the previous tree planting was approved by HDC. The planting proposals for this scheme aim to integrate with the previously approved strategy.

   Regarding the proposed building style, I will defer to the Architect for specific comments. However, in landscape terms the design of the dwelling was intentionally selected to use materials and possess a visual appearance reminiscent of a Sussex Barn, which is consistent with the Warnham and Rusper Wooded Ridge landscape character area.

5. The location of the existing mobile home which is to be removed as part of these proposals is squeezed in between an existing American Barn Stable and the horse walker and there is not enough available space in that location for a new dwelling. The removal of the mobile home which is a discordant feature and its replacement with a new purpose-built dwelling overlooking the menage and main buildings does keep built element on the site coalesced around newly built Indoor Arena and American Barn allowing for direct oversight in security terms.

Overall, I was disappointed that the consultant from HDC adopted a negative stance and misinterpreted the terminology as defined in the GLIV 3rd edition concerning cumulative effects on landscape character. Additionally, their judgment of the visual impact on the visual receptors using the PROW within the broader context of this rural enterprise aimed at supporting the breeding and training of competition horses was overly negative and evidence that it is likely that no site visit was undertaken by them.

Yours sincerely



Trevor R Furse CMLI MCI Hort ISA

Landscape Institute
Registered practice

Southampton Office:
Magnolia House No 6 Old Cracknore Close Marchwood Southampton SO40 4SE
Tel: +44 (0)23 8066 9833

Horsham Office: 2 Wayside Cottages Brighton Road Monksgate Horsham West Sussex RH13 6NE
Tel: +44 (0)14 0389 1966

Email: Info@Furse.net Web: www.Furse.net