

APPENDIX A to Fittleworth Objection

Response to the Landscape and Visual Impact Assessment LVIA

Susanne Dipper BSc Hons. MSc. MPhil. Chartered Landscape Architect.
May 2010

Background to the LVIA

In response to Barlavington Estate's request for a Screening Opinion for a sandpit or quarry at Horncroft, West Sussex County Council stated (November 1999) that: 'By virtue of the scale and nature of potential impacts it was considered that the proposals have the potential for significant environmental impacts', and 'The assessment should have particular regard to the potential impacts of the development on public rights of way, public areas (Sutton Common), and the AONB (now national park) and the South Downs, and how this would be mitigated'. WSCC also noted 'the potential to impact on the South Downs National Park and conserving and enhancing the natural beauty, opportunities for enjoyment by the public, wildlife and cultural heritage of the national park...'

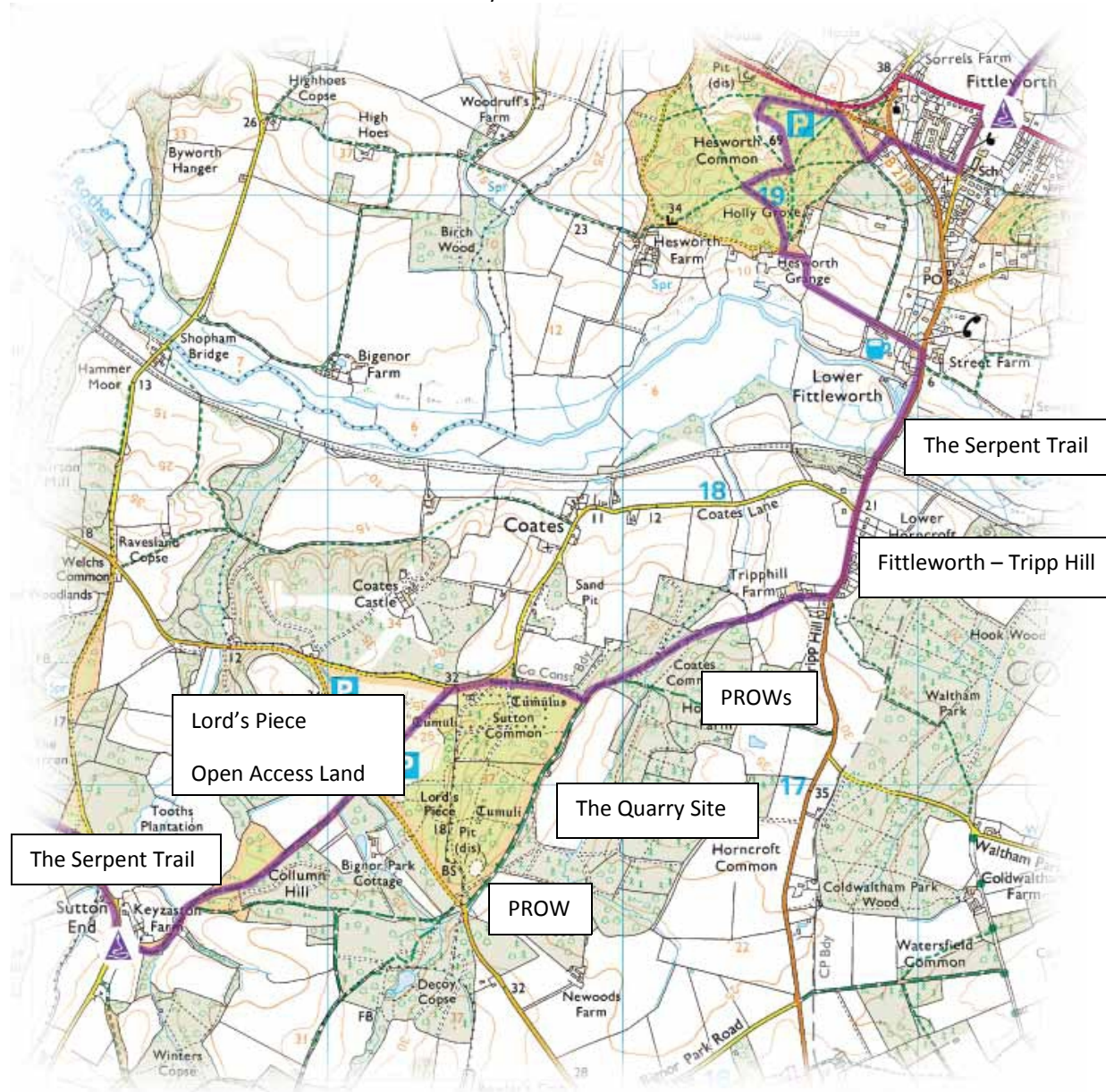
Existing Baseline Conditions: Landscape Setting

Situated in the middle of the new South Downs National Park, between the River Rother to the north and the Chalk Downs to the south, Horncroft sits in a rich landscape derived from a complex geology, landform and land use history. Bands of chalk, clay, sand, gravel heads and riverine deposits all occur within a 4km east west belt giving rise to a landscape of low undulating hills and ridges dominated by deciduous woodland, with deep cut lanes, small villages, fields and open heath, all overlooked by the high scarp of the Chalk Downs to the south, and Commons of Fittleworth to the north.

The proposed quarry site is located in an attractive, small valley defined to the east by the slopes of Horncroft Warren, the top of which forms the eastern boundary of the Site, and to the west by the ridge of Sutton Common. At the base of this ridge runs a bridleway lined with mature oaks that define the western boundary of the Site. The Site itself has ancient field boundaries and is likely to include buried features of archaeological interest. Of particular interest in terms of landscape on and adjacent to the site are:

- The two PROWs immediately adjacent to the Site, including the Serpent Trail. Also the common usage of the path through the Site by the local community
- The Open Access Area of Sutton Common / Lord's Piece
- The views of the Chalk Downs from the ridge of Sutton Common above the site
- The mature oaks along the PROW at the edge of the Site and the mature oaks occurring on the Site
- The attractive stream and enclosure of the valley
- The setting of the SAM

Public Access in Relation to Horncroft Sand Quarry



Principle features of the development

The likely principle features of the proposed Horncroft Sandpit that are of landscape significance during the 25 year working and restoration period will be:

- a 7m wide access road, high kerbs, traffic islands, signs, site compound, earth mounds, road cutting, new planting, possibly fencing.
- phased quarrying of Horncroft Warren, formation of 20m sand cliffs, 2m high perimeter fencing and signage, new planting along bridleway, progressive new planting of sections of the quarry, quarry vehicles, customer HGVs in quarry and on roads

- quarrying of Mansby Field, wide metal bridge over stream, formation of 8m steep slopes, quarry vehicles, customer HGVs in quarry and on roads

Following restoration, the likely principle features will be:

- new establishing woodland adjacent to the Fittleworth Bury road
- 20m sand cliffs, fencing, new planting, raised stream and margin, bridleway for public use
- a large pit with up to 8m slopes, fencing, individual tree planting

Re: LVIA 10.F Landscape Impacts: Mitigation of impacts by tree and shrub planting

Unusually for a landscape and visual impact assessment, the LVIA outlines mitigation and restoration proposals before describing the landscape and visual impacts of the development. While this may be a valid approach, it makes it harder to appreciate fully the real extent of landscape change caused by the development. Most importantly, the basis for this approach relies on an assumption that early planting would provide very effective screening for all but the first phases of construction; the LVIA then incorporates this potential screening onto the 'baseline' before assessing the likely impacts.

We believe this assumption to be fundamentally incorrect for the following reasons:

- With the exception of the proposed planting on the arable field at Horncroft Common, establishment rates and effective growth rates for the proposed trees and shrubs are likely to be very low indeed given that these will occur on arid, acidic, infertile and unstable pure sand on the quarry floor, or under the canopy and between existing mature oaks on very sandy soil at the western boundary.
- Although rabbit protection is proposed, this area has a significant number of browsing deer, and without deer fencing newly planted trees and shrubs are unlikely to grow well; fencing creates its own visual impact.
- It is probable that although the retention of mature trees alongside the stream and the bridleway boundary will provide partial screening of the works, these trees with their large root-zones, will come under stress once the ground around them is excavated, leading to a decline in health and screening potential during the lifetime of the quarry.
- Native trees and shrubs, while entirely in context, provide very little winter screening
- Trees and shrubs are generally suppressed when planted between mature trees as proposed along the bridleway and will only provide a partial screen, mostly during the growing season. Indeed, this planting activity may even have a detrimental effect on existing trees; ref: 4.3.1 'All landscaping activity within RPAs has the potential to cause severe damage'¹.
- No planting or restoration is proposed for the quarry cliff faces.
- Heathland Restoration for the western half of the site will include spreading with cuttings of heather and grasses for one half of the site, leaving the other half for natural colonisation. This has problems as it is notoriously difficult to get heathland vegetation to establish; the long term heathland restoration at both Lords Piece and Hesworth Common illustrates this difficulty (Fittleworth Parish Council with the help

¹ Arboricultural Impact Appraisal and Method Statement, Alder, C. Barrell Tree Consultancy, 2010

of the South Downs Joint Committee manage Hesworth Common). Thus, the area of Mansby will remain an area of almost pure sand in a deep pit (8m banks) for a very long time, and while it is proposed to plant individual oaks in this pit, even if they do establish, they will not contribute positively to the scene for many decades.

We have therefore based our landscape and visual assessment on the basis that the screening effect of new planting in and around the quarrying will not provide very effective screening during the lifetime of the excavation and restoration works.

Response to the Impact Assessment

As explained in the LVIA, the assessment methodology adopted recognises that certain landscape elements or viewpoints can be rated 'low' to 'high' according to their importance; this is their 'sensitivity'. The magnitude of impact can rate the scale and nature of likely landscape change from 'none' to 'high' during and after the development's lifetime. By cross referencing 'sensitivity' with 'magnitude', the assessment derives the 'impact significance'. We have looked in detail at the LVIA analysis; where we disagree, we have shown this below (boxes) supported by explanations.

Re LVIA: 10.F.20 -23 Landscape Character

Using criteria set out in the LVIA we judge the impact on the landscape character not *moderate adverse* but to have **substantial adverse impact** during quarrying and not *significantly beneficial* but to have **substantial adverse impact** after restoration.

The application site lies in the Rother Farmland and Heath Mosaic character area (L2)², regarded to be **high sensitivity**. Given the characteristic of quarrying, which is not a beneficial characteristic of this landscape area, we disagree that the magnitude of impact during the working stages of the development is *low adverse* (ie that it will cause only minor loss to the existing characteristics). We judge the magnitude of impact to be **high adverse**. We also disagree that once the site has been restored the magnitude of impact on this character area will be *medium beneficial* (ie that it will cause considerable beneficial alteration to existing characteristics), but judge that the magnitude of impact will be **high adverse**.

Re LVIA: 10.F.24 - 33

As there is no physical relationship between the site and other landscape character areas, ie they are not 'landscape elements' that are relevant to this quarry site, we judge that they need not be included in this assessment. Any visual impacts from viewpoints in these areas are assessed separately.

Re LVIA: 10.F.34 - 37 Land Use

Using criteria set out in the LVIA we judge the impact on land use not *moderate adverse* but

² Integrated South Downs Landscape Character Assessment, Land Use Consultants, 2005, for the South Downs Joint Committee.

to have **substantial adverse impact** during quarrying and not *moderate beneficial* but to have **significant adverse impact** after restoration.

The LVIA notes that 'A bridleway runs adjacent to the western site boundary and around the northern end of the site'. It does not acknowledge the significance of the Serpent Trail as a county walking route and the Lord's Piece Open Access area that overlooks the development site. The site and adjacent areas are well used by locals and tourists for walking, riding and running (including Fittleworth Flyers running club and South Downs Orienteers). Therefore we consider that land-use is **high sensitivity** and not *medium sensitivity* as the applicant states. We disagree that the magnitude of impact during the working stages of the development is *medium adverse* (ie would cause only partial loss to features or introduce elements that though prominent are not uncharacteristic). We judge the magnitude of impact to be **high adverse**. We disagree that after restoration the magnitude of impact will be *moderate beneficial* due to the very long timespan that will be required for trees and heathland to establish. We judge it to be **medium adverse** after restoration

Re LVIA: 10.F.38 - 41 Topography

Using criteria set out in the LVIA we judge the impact on topography not *significant adverse* but **substantial adverse** during quarrying and after restoration.

We agree that topography is **high sensitivity**. We disagree that the magnitude of impact on topography during the working stages of the development is judged to be *medium adverse* (ie would cause only partial loss to a key element). We judge it to be **high adverse** since 'the proposals would cause total loss or major alteration to key elements' of the landscape even after restoration.

Re LVIA: 10.F.42 Vegetation

Using criteria set out in the LVIA we judge the impact on vegetation not *minor adverse* but **substantial adverse impact** during quarrying and not *significant beneficial* but **moderate beneficial impact** after restoration.

The importance of the mature, possibly 200 year old oaks on the wooded slope is understated in the LVIA. 'A number of (category B) trees visible as skyline features from outside the site' and 'Large individual trees and significant features created by tree groupings are a dominant element of local character'³. Therefore we consider that vegetation is **high sensitivity**.

'This proposal will result in the loss of several high category trees and groups of trees'⁴. Some 40 category B mature oaks or groups of oaks, and 5 category A mature oaks or groups will be removed by the excavation. In addition, while there are significant areas of coniferous planting, the majority of this is mature scots pine, an appropriate species for this sandy area (the applicant has retained some of these trees on the adjacent Lords Piece for

³ Arboricultural Impact Appraisal and Method Statement, Alder, C. Barrell Tree Consultancy, 2010

⁴ ditto

landscape reasons and indeed this species is specified within some of the proposed woodland planting). The LVIA states that ‘the woodland areas are not ecologically diverse’ but then neither is heathland (and indeed this is to be expected on very sandy soil as found here). It is, however, of ‘County Importance’⁵ and mature native oaks support the richest of invertebrate fauna in the UK. Moreover, this wooded slope, while undoubtedly deserving of good woodland management to improve its status, provides visitors using the Serpent Trail with a magical experience of enclosure which contrasts dramatically with the openness of the views to the South Downs when they reach the ridge of Sutton Common and Lord’s Piece. While it is likely that in this case the bluebells are not indicative of ancient woodland, they do indicate that the banks found throughout the site are ancient and have remained relatively undisturbed since medieval times. The fact that the mature oaks are multi-stemmed may suggest that they were at one time cut or coppiced. A strip of mixed oak woodland would be retained along the stream, but the LVIA recognises the likelihood of stress on these trees through its suggestion that the cut ‘slopes would be spread with topsoil to increase water retention within the soil, in order to minimise the potential impact on the retained trees which would be at a higher elevation than the floor level of the excavation’.

Mitigation includes soft landscape works being carried out around mature oaks which may pose a risk to the oaks themselves. ‘All landscaping activity within the RPAs (root protection areas) has the potential to cause severe damage’⁶. New hedgerow and native woodland planting and management towards the creation of heathland may eventually balance the impact on the vegetation although it is questionable that the proposed woodland management to existing areas of woodland is dependent on quarrying.

Bearing the above in mind, the magnitude of impact on vegetation during the working stages of the development is judged not to be *low adverse*, but **high adverse**. Once the site has been restored the magnitude of impact is judged not to be of *high beneficial* impact, but of **low beneficial** impact given the difficulty of establishment and the long time likely to be taken for rich habitats to form.

Re LVIA 10.F.44 - 45 Public Rights Of Way

Using criteria set out in the LVIA we judge the impact on public rights of way not *neutral* but to be **significant adverse** during quarrying and not *significant beneficial* but **neutral** after restoration.

We agree that PROW is **high sensitivity**.

However the LVIA does not at this point consider the two public rights of way (bridleway 762 and a restricted byway) that are located immediately adjacent to the northern and western edges of the site. This includes the Serpent Trail which ‘*snakes for 64 miles (108km) through the beautiful heathland landscapes of West Sussex. Waymarked by Serpent Trail discs, the route showcases the work of the Sussex Wealden Greensand Heaths Project and highlights the outstanding landscape of the greensand hills.*’⁷

⁵ Corylus Ecological Survey

⁶ Ditto Arboricultural Impact Appraisal and Method Statement, Alder, C. Barrell Tree Consultancy, 2010

⁷ <http://www.westsussex.gov.uk/ccm/content/leisure-and-tourism/walking-cycling-and-horse-riding/serpent-trail.en?page=1>

In addition, the track through the proposed quarry, through the lower parts of the woodland, has been enjoyed by walkers and riders since before 1914 which is well before the Barlavington Estate purchased the land. There is also statutory open access land with its ridge just above the quarry site. The LVIA fails to mention these as a factor for assessing the landscape impact on PROWs at this point in its assessment. We disagree that the magnitude of impact on public rights of way during the working phases is *none* but judge it to be **substantial adverse**. We disagree that once the site has been restored the magnitude of impact on public rights of way is judged to be *medium* but, given that the proposed new path through the site would in effect replace an existing one (although not a PROW) judge the magnitude of impact to be **none**.

Re LVIA 10.F.46 -48 Water Courses

Using criteria set out in the LVIA we agree that the impact on water courses during quarrying and restoration may be **moderate adverse**.

The proposals include protection for the pretty little stream through the site. However, we note that water courses are a **high sensitivity** landscape element and there is potential for a significant level of disturbance and pollution, particularly where the metal bridge crosses at the upper end of the stream, and the sides of the stream will be liable to collapse here. Also the report identifies that the catchment where water currently drains from the slopes of Horncroft Warren will be removed. Provided that protection measures are stringently followed, we agree that during and after excavation the magnitude of impact may be **low adverse**.

Re: National Statutory and Local Designations

Using criteria set out in the LVIA we judge the impact on national statutory and local designation during quarrying to be **substantial adverse** and **moderate adverse** after restoration.

The site and its surroundings are within a National Park. Both national and county policy applies which gives a strong emphasis on landscape, amenity and nature conservation. As such, national statutory designation is **high sensitivity**. Given the priorities of UK national parks, the magnitude of impact during excavation is **high adverse**, and after restoration will be **low adverse**.

We judge these to be **medium sensitivity**. Although no Sites of Nature Conservation Interest (SNCI) occur on site, two have been identified by West Sussex County Council very close to the site at Horncroft Farm Pasture and Lord's Piece. With regard to Horncroft Farm Pasture, it is thought possible by the South Downs Joint Committee field staff that the site will be adversely affected by the adjacent excavation. Therefore we consider that the magnitude of impact for SNCI's is **medium adverse** both during and after excavation.

Re: Archaeology and Cultural Heritage

Using criteria set out in the LVIA we judge the impact on archaeology and cultural heritage

to be **significant adverse** during quarrying and **neutral** after restoration.

Scheduled ancient monuments (SAM), archaeologically sensitive areas, listed buildings, conservation areas, historic parks and ancient woodland all occur within a kilometre of the site. These are judged to be **high sensitivity**.

No designated ancient or historic feature occurs on site. 'However, the broader historic landscape in which the Site is located, will be significantly affected by the proposals: The land-use and settlement pattern of the Study Area has survived relatively unchanged since at least the medieval period, and a section of this landscape will be completely removed by the proposed extraction, along with the surviving remains of historic boundary features and evidence for the development of different land-use systems, such as the management of coppice woodland regimes and remnants of common arable fields'.⁸

Four SAMs are recorded locally including a group of Bronze Age bowl barrows on Sutton Common, located close to the western perimeter of the Site. In terms of the impact of the proposed extraction on the setting of the SAMs 20066 and 20063, these are located on the eastern edge of Sutton Common, which directly overlooks the extraction site from the west. 'Although the current proposals will not physically affect these monuments, it is likely that the barrows were specifically sited to overlook the valley to their east, and it is therefore clear that the proposed extraction will have a significant impact on their setting'.⁹ Two Archaeologically Sensitive Areas exist nearby: a Mesolithic site at Broadhalfpenny and also at St Agatha's church 500 and 600m away from the quarry respectively.

The Conservation Area of Coates hamlet is located about 500m north of the site, and the Conservation Area of lower Fittleworth at just over 1km from the quarry. The following 20 or so Listed Buildings lie close to the boundary:

- The Grade 1 listed Parish church of St Agatha, Coates, 13th century or earlier, also an Archaeologically Sensitive Area, lies approximately 600m from the quarry
- C17th Horncroft Farmhouse and Satchers lie approximately 200m from the quarry and access road
- C17th Keepers Cottage, Bignor Park Cottage and Coates Castle & park lie approximately 500m from the quarry
- Tripphill Farmhouse, Coates Manor, Coates Farmhouse, all C17th, other buildings in Coates Conservation Area, and Flint Cottage all lie approximately 600m from the quarry
- The Historic Park & Garden of Bignor Park, listed on the English Heritage Register lies approximately 600m from the quarry
- 4 more listed buildings within 1,000m of the quarry.

While none of the listed buildings or Conservation Areas will be affected by the extraction area itself, the settings of two listed buildings will be affected by the access road, and it is clear that there will be a general impact on buildings located next to a road with additional quarry HGVs passing along, including the Conservation Area at Fittleworth.

⁸ Peer Spanner Archaeological Report

⁹ ditto

Some ten areas of Ancient & Semi-Natural Woodland and Ancient Replanted Woodland occur within 1km of the site. Although not occurring on the Site itself, ancient woodland is located close to the southern boundary¹⁰ and ancient woodland indicator species are present in the woodland of the quarry site.

The magnitude of impact for archaeology and cultural heritage is judged to be **medium adverse** during excavation, and **none** following restoration.

Re LVIA 3.14 Agricultural Land Classification

Using criteria set out in the LVIA we judge the impact on agricultural land to be **moderate adverse** during quarrying and after restoration.

Agree that this is **low sensitivity**, however during quarrying and after restoration, with the removal of agricultural potential, the magnitude of impact is **high adverse**.

Response to the Visual Impact Assessment

A review of the Visual Impact Assessment finds generally that the applicant judges the visual impact to be generally low. We have found, however, that this is often not the case, and have also identified additional significant viewpoints.

¹⁰ Revised Ancient Woodland Inventory for West Sussex, Sussex Biodiversity Record Centre 2010.

Summary of Potential Visual Impacts

LVIA Ref	Locations	Sensitivity	Magnitude starting: 'Where the development site would be individually appreciated in the overall view and	Significance
<p><u>From Long Distance Views approximately 4km from quarry</u></p> <p>The South Downs Way is a national trail that in this section runs along the crest of the Chalk escarpment. Panoramic views across the Low Weald landscapes of the national park can be enjoyed by walkers and horse riders. The view includes a foreground of large open fields at the foot of the scarp, a mid ground of predominantly deciduous woodland with small fields and heath, a background of larger scale field and woodland on the slopes rising north of the Rother Valley, and distant views to the Surrey Hills. Horncroft quarry lies in the mid ground in a significant swathe of mixed woodland. In addition, the loss of tree cover from the Site will be just perceptible from some views, and the top of the cliffs will start to become discernable from year 10 into the latter phases and beyond, particularly from Farm Hill access land. We do not agree that where the quarry site can be seen it will 'disappear' into the overall landscape; in fact, the exposed yellow of the quarry cliffs may be quite obvious when the low angle of the sun catches cliff tops in the late afternoon and evening.</p> <ul style="list-style-type: none"> • When walking between Bignor Hill Toby Stone to the lower slopes of West Burton Hill, Horncroft is highly visible; the northern part of Mansby, much of Horncroft Warren and the whole of Horncroft Common can be clearly seen. Thus the quarry and access road and HGVs will be highly visible for the whole of the operational life of the quarry. Following restoration, quarry cliffs and a significant part of the quarry floor will remain visible. • *From the Bignor Hill viewpoint near the car park views are currently screened by the tops of the trees on the upper slopes of the scarp; however, it is noted that trees and scrub may be periodically cleared around the viewpoint to open up the panorama to visitors, in which case, the quarry would be highly visible. • From the PROW east of Glatting Beacon there will only be limited diffuse winter views of the quarry site due to screening by the crowns of deciduous trees on the upper slopes of the scarp. • From Bignor Hill access land the quarry site will not be visible. • From the north, on the slopes above the Rother, it is likely that the top of the quarry cliff will be visible from some points along Haslingbourne Lane, the PROWs and from some residences in Lower Byworth. 				

2, 5, 6	South Downs Way between Toby's Stone & West Burton Hill & tumuli, Farm Hill access land, PROW at Barlavington Down, Points along Haslingbourne Lane including PROW & Lower Byworth	<i>High</i>	'....causes a <i>significant</i> deterioration forming an immediately apparent part of the scene affecting the overall character of the scene'	Substantial adverse impact
1, 3, 4	South Downs Way at Bignor Hill: viewpoint Bignor Hill access land, PROW at Glatting Beacon	<i>High</i>	'Where the development site would on balance have little effect on the scene'. * But note comment above	Neutral*

From Medium Distance Views 1 – 3km from quarry

With one exception, these viewpoints are mainly from lower ground. It is likely that there are other views of the site from the many PROWs in this area where during quarrying and after restoration, the sandy cliff tops may be visible particularly during winter.

- Hesworth Common viewpoint and bench is very popular with the Fittleworth community and visitors from further afield. This open access area is managed for heathland and woodland mosaic but with amenity in mind. This lovely view encompasses the Rother valley and the wooded ridges and vales to the wooded scarp of the South Downs. The quarry cliff will be clearly seen from this viewpoint both during quarrying and after restoration.
- Barlavington Lane to the south west of the Site is an attractive narrow road popular with both locals travelling to and from Chichester and Portsmouth, and tourists as it traverses the bottom of the chalk scarp taking in the picturesque villages here. Where this popular PROW descending the Chalk Downs to the Weald crosses the lane, the view opens in the direction of the quarry site. The sloping ground of Horncroft Warren and the higher ground of Horncroft Common are clearly visible from the stile and footpath. The quarry cliffs will become and remain highly visible especially during late afternoon and evening.
- From Bignor Park and Coates Lane, the trees from the highest elevation will be lost from the view but it is unlikely that the quarry itself will be visible.

	Hesworth Common viewpoint, PROW & open access land	<i>High</i>	'... causes a <i>significant</i> deterioration forming an immediately apparent part of the scene and affecting the overall character of the scene'	Substantial adverse impact
	Barlavington Lane PROW	<i>High</i>	'...causes a <i>moderate</i> deterioration forming a visible element in the scene, having an effect on the scene'	Moderate adverse impact

7	Bignor Park historic park, Coates Lane	<i>High</i>	'... causes <i>slight</i> deterioration forming a <i>minor</i> element in the scene'	Slight adverse impact
<p><u>From Close Views from the area immediately surrounding the site</u></p> <p>The quarry site is judged by the Applicant to have little adverse visual impact on close views. While we recognise that the quarry itself is enclosed by the higher ground of Horncroft and Sutton Commons, and that phasing the excavation works and advance planting would go some way to reducing the scale of impact, nevertheless, the views from the Serpent Trail, bridleway and Lord's Piece would be significant and the impact heightened by inevitable movements and alien noises during quarrying and restoration. The access road must also be considered.</p> <ul style="list-style-type: none"> • It is from the Serpent Trail, bridleway and the open access land that the quarry will be most visible. Walkers, joggers and riders currently enjoy the tranquillity, and wooded enclosure of this site which complement the lovely wide open views from Sutton Common, across Lords Piece to the Chalk Downs. With Pulborough Station nearby, this area has the potential to become even more popular with visitors choosing to start their walks in the National Park to and from Hesworth Common or the Swan Inn at Fittleworth. There is a feeling of wild nature here that is so unusual in the South East of England. For locals and visitors walking the Serpent Trail or the ridge on Lord's Piece, no amount of new planting will screen the quarry fences, digger, dumper, vibrator, HGVs and emerging cliff faces from walkers and riders; and the noise on site will be at odds with the birds and background hum of rural life. • The private house of Mansby looks on to the quarry site and will be directly affected for the whole life of the quarry. • The level, open fields of Horncroft Common afford clear distant views of the South Downs escarpment. During the construction and quarrying phases, residents living nearby and motorists travelling along the Fittleworth Bury road will have good views of the access road and its high concrete kerbs, traffic islands, signs, fences, mounds, cuttings, new planting and HGV's. In ¼ century's time, the access road will be removed and new woodland will have matured, giving more enclosure to the area, and restricting the long views south. 				
16, 17, 18 8 -15	All points along the PROWs bordering the site, including the Serpent Trail and open access land above the site. 2 listed buildings & the Fittleworth to Bury B road Mansby dwelling	<i>High</i>	'... causes a <i>substantial</i> deterioration being a dominant feature to which other elements become subordinate and markedly affecting the overall character of the scene	Severe adverse impact

Re: LVIA 10.F.60 Significance of Predicted effects

We agree with the Applicant that this landscape within the South Downs National Park is 'sensitive', and that in the first 10 years of quarrying there would be an 'adverse primary impact with the loss of woodland cover and other vegetation, significant changes to topography and the creation of a temporary sandpit land use'. We judge, however, that this scale of impact will continue throughout the life of the quarry, and that 20 years will not seem temporary to the people who use this area. We do not agree with the Applicant that 'the distance and panoramic nature of the views (from the Chalk Downs) result in the site being a minor element of the scene'. We would point out that it is not correct that 'no residential dwellings would have direct views of the sandpit' as the house called 'Mansby' is situated on Coates Common just above the quarry site.

The Applicant highlights that mineral workings are a feature of this landscape as sand has, of course, been won locally for centuries. We note, however, these old workings are small, hidden, and generally out of bounds to the public. This quarry at Horncroft is located next to paths and areas that are well used by local people and visitors to the area; it will not be a hidden and overgrown secret, but will remain clearly identifiable as a recently disused quarry which on account of the unstable cliffs, will need to be securely fenced.

We feel it is admirable that the proposal includes measures to enhance the quarry for wildlife and biodiversity; it is clear that much thought has been put into this and the choice of planting has been carefully chosen. Clearly, of course, it would be far easier and more effective, if there is a true commitment to improve the site for wildlife, to do this without any quarrying; indeed, the Applicant has demonstrated this well at Lord's Piece and elsewhere.

We do not agree with the Applicant that 'overall, the long term impact on the landscape elements is, on balance, beneficial', or that 'the residual impact over the long term with the restored landscape would improve the experiential qualities by replacing intense agricultural management with land managed for wildlife and conservation'. The 'restored' quarry will not produce a landscape that is of a higher quality than is currently the case. If an improvement should be made to this landscape, it might simply be a case of removing the coniferous trees on Horncroft Warren and replanting with native species and by establishing heathland areas on Mansby; after all, the Applicant has done this on Lord's Piece and elsewhere. It should also be borne in mind that while the Applicant has the the admirable intention to restore the development for nature conservation, it is common for disused quarries to eventually have other uses (eg Coates Sandpit for pigfarm storage, Heath End builders merchant).

Even though the proposal includes phased workings to reduce the impact, the impact on the landscape is unquestionable and the view of the top of the large sand quarry north of Fittleworth, now visible from the South Downs Way, should send alarm bells out given that Horncroft is much closer to these viewpoints. What can be envisaged from the public areas adjacent to the workings is that in a ¼ of a century Horncroft will comprise a large pit

surrounded by 8m high eroding, unstable slopes near the bridleway to 20m high eroding cliffs facing the bridleway. We can agree with the LVIA that 'the steep banks will be at odds with the surrounding landscape'. The odd raised bank of land supporting declining mature trees will enhance the divide between the two areas.

- The area that is currently Mansby field and closest to the bridleway will be almost bare sand with some planted trees struggling to survive, although self sown birch saplings will be establishing. The eroding banks will be starting to undercut the mature oaks between the pit and the bridleway and there will be fencing and notices warning the public to keep out because of the 8m high unstable slopes. The Field Crickets will be moving in, but not much else.
- To the west of the raised stream where Horncroft Warren used to be, a private bridleway will again allow walkers and riders through the site. They will see the 20 metre high cliffs at the back of this area which will be spectacular but out of bounds and fenced off for safety. The cliffs themselves will be unstable and, as at Coates Sandpit, will start to recede at the top. The sand martins will already be established in the cliff face and there may be some tiny red tipped cudweed but not much else. The quarry floor here is likely to be of more landscape and amenity interest, although much of the planting will be struggling to establish in this dry acid sandy soil and fencing will be required to protect from browsing deer. It is likely that acid grassland and birch scrub will be colonising on the more stable areas where the original surface soil has been spread.
- The access road with all its signage etc will have been removed and planted. The woodland planting will be well established and, while losing its long views to the Chalk Downs, this area is likely, eventually, to result in an improvement to the wider landscape.

Conclusion

We have seen that the planting proposals which are aimed at screening the impact of the development will simply not rise to the challenge, and that the 'restored landscape will retain the character of a disused quarry with fencing, scrubby areas and unstable slopes. We have identified that the loss of mature oaks and the creation of new habitats is not likely to provide a higher quality of landscape or amenity. We believe that the presence of the quarry and its traffic will have an impact on nearby houses and historic features. We have shown that the disruption to the enjoyment of this landscape by locals and visitors using the rights of way adjacent to the site and those enjoying the panoramas from popular viewpoints may be significant.

We do not, therefore, agree with the Applicant that the landscape and visual impacts of the development will be minor or moderately adverse during quarrying and neutral or beneficial following restoration.

It is our judgement that the landscape impacts will in many cases will be significantly adverse during quarrying and generally moderately adverse after restoration, and the visual impacts will be substantially or severely adverse from key views on and off site.

What does designation mean?¹¹

Designation as a National Park is a formal recognition of the South Down's special qualities in terms of natural beauty and opportunities for open-air recreation. It means that:

- **the area has the highest level of landscape protection under the planning system**
- *there is a fixed boundary for the area to be protected*
- **public bodies and others are required to have regard to National Park purposes when operating in the area**
- *it permits a National Park authority to be established (under the Environment Act 1995) to carry out functions associated with the Park*
- **National Parks, along with Areas of Outstanding Natural Beauty, are considered to be the nation's finest landscapes. They form part of a worldwide network of protected landscapes established by the IUCN (International Union for the Conservation of Nature)**

¹¹ From DEFRA website