

Technical Note

Review of the Landscape & Visual
Impacts of Crouchlands Farm
Whole Farm Plan & Regeneration

Plaistow and Ifold Parish Council

Ruth Childs (CMLI)

October 2022

Planning Reference: 22/01735/FULEIA

Landscape has an all-encompassing definition (see Appendix below) and many, if not all aspects of proposals affect landscape, be it directly or indirectly. However, the following are considered to be the most relevant and affected policies from Chichester District Council’s (CDC) Local Plan.

Policy 25 - Development in the North of the Plan Area

Requires in particular the conservation and enhancement of rural character and landscape quality.

Policy 45 - Development in the Countryside

Requires in particular proposals to demonstrate they require a countryside location and meet the essential small-scale and local need.

Policy 47 - Heritage and Design

Requires in particular proposals to conserve and enhance listed buildings and their setting, and historic landscapes. It expects new development to recognise, respect and enhance local distinctive character, respect the identity of individual settlements and maintain the integrity of the open and undeveloped character of the area.

Policy 48 - Natural Environment

Requires in particular no adverse impact upon; the setting of the South Downs National Park, the tranquil and rural character of the area. It expects distinctive local landscape character to be recognised and contributed to sensitively. Development of poorer quality agricultural land should take preference over the best and most versatile.

Policy 49 - Biodiversity

Requires in particular, biodiversity value to be safeguarded. Demonstrable harm to protected species or habitats avoided or mitigated.

NPPF Many paragraphs relate to landscape, but mostly **174** and **176**.

Section Summary
1. The Proposal is contrary to CDCs own landscape evidence-base (terra firma, Landscape Capacity Study, 2019).
2. It conflicts with landscape guidance in the NPPF and policies in the CDC Local Plan .
3. The proposal will adversely affect the setting of the South Downs National Park and the valued tranquil and rural landscape character of this northern part of the District. Contrary to [Policy 48 (1)] and National Park Purposes.
4. In parallel with 3 above, the proposal is of an inappropriate type, scale, and design to respect /conserve and enhance landscape character [Policy 25, 45 and 48] .
5. The proposal fails to demonstrate at every stage of the process, a sensitive ‘ landscape-led approach ’ to design.

6. The proposal as submitted is technically poor. It fails to apply accepted definitions of landscape and landscape character. Key evidence and information is missing and the application does not follow the mitigation hierarchy - a key part of the landscape-led approach and best practice. Nor does it meet the expected detail and quality for an EIA application. The findings of the LVIA are not supported. Some shortcomings are included in the detailed matters for 1-5 presented below.

The following adds some detail to assist the case officer, by considering to each point in turn.

Landscape Sensitivity & Capacity

1. The Proposal is not supported by a landscape sensitivity and capacity study. Nor has the applicant sought to commission an objective assessment of landscape character - a Local Landscape Character Assessment.

CDC have their own landscape and visual evidence, updated in 2019 in support of the Local Plan Review process. (The application only refers to the older (2011) version). This evidence does not cover the site, but sub-area 156 comes very close. This assessed sub-area (156) is slightly closer to Plaistow than the application site, but it is reasonable to consider that it shares many of the same or similar characteristics and sensitivities. Although, the application site, being more isolated from settlements, is potentially *more* deeply rural and thus could be more sensitive than sub-area 156. Using the findings of this Study as a proxy for the site, its capacity could be described along the following lines (extract of capacity described in the 2019 Study):

'It is possible that a very small amount of development may be accommodated within existing clusters of farmstead settlement, larger garden plots, paddocks or building conversions provided it is informed by further landscape and visual impact assessment and sensitively integrated into the landscape, respecting the historic settlement pattern and locally distinctiveness, although great care would need to be taken to avoid any landscape or visual harm.' [our emphasis]

The site's landscape sensitivity has not been addressed, and is downplayed throughout the application, particularly in the LVIA which refers to its industrial rather than agricultural character - skewing the impacts identified. In part this is due to an inadequate and poorly informed evidence-base (if you do not recognise what you have, it cannot be respected and enhanced). At each stage of design the application fails to be sensitive to its landscape. From the non-agricultural uses proposed, to their scale, design and details, the care and sensitivity needed has not been demonstrated.

2. The application is contrary to the **NPPF**. These are picked up specifically in points 3 and 4 below.

Setting of the South Downs National Park

3. The applicant's landscape specialist advises that the proposal site comprises the **setting** to the South Downs National Park at this location. This finding is supported. Landscape setting is not defined in Guidance or Policy, be it the National Planning Policy Framework (NPPF), the Chichester District Council (CDC) Local Plan or South Downs National Park (SDNP) Local or Management Plan.

This is correct, as setting cannot be defined, every landscape is different and every setting is correspondingly, also different. The importance of setting to protected landscapes, including the South Downs National Park is set out in a number of places:

- a. The update to the **NPPF** has strengthened the landscape paragraph to include reference to setting (**176**), it now states:

'The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas'

As stated above - there has been no sensitivity study and the sensitivities of this landscape have not demonstrably been understood or recognised in the application documents or proposal itself. The type of uses, scale and design further show that the proposal has neither been sensitively located (uses conflict with its deeply rural and tranquil character), or designed. The result is, adverse effects have neither been avoided or minimised (in accordance with 176 of the NPPF and professional best practice which recommends following the mitigation hierarchy (GLVIA3) and Policy).

- b. CDCs own policies recognise the importance of the setting of the South Downs National Park which, under **Policy 48 - Natural Environment** requires 'no adverse impact upon the setting of the National Park'.

The LVIA concludes there will be an adverse impact ('minor adverse-neutral') upon the setting of the SDNP. This finding demonstrates the proposal is contrary to Policy. However:

- the application has failed to demonstrate the extent of the SDNP setting at this location.
- It also fails to provide a comprehensive and well-understood baseline of evidence from which to assess the effects on setting resulting from the Proposal.
- The LVIA suggests that the site continues to contribute to the setting of the SDNP through shared distinctive landscape patterns (character) such as historic drove routes, woodlands and settlement, which characterise the Low Weald. Yet;
 - None of these characteristic elements have been mapped or understood.
 - None of these characteristics have been adequately valued for their role in the shared characteristics this site has with the National Park.
 - The assessment of harm has only considered rights of way. Views from within the SDNP have not been included or assessed in the LVIA.
 - Assart fields and other surviving medieval characteristics remain unrecognised and developed, yet are identified in CDCs terra firma (2019) evidence base.

Therefore, it is considered that the LVIA has underestimated the effects upon the setting. The 'minor-neutral' adverse effects are based upon an inadequate baseline, and failure to properly assess all aspects of landscape (character, visual, perceptual and its Special Qualities) in relation to the SDNP. However, it is agreed with the applicant's landscape specialist that the best way to deliver a sensitive proposal within the setting of a nationally valued landscape is to ensure it has been landscape-led in its design approach (see **section 5** below).

- c. The quality of this landscape can be further understood with reference to the SDNP boundary. The SDNP was formally created in 2011. Its creation followed a long process of landscape assessment, consultation and boundary revisions. The Inspector produced a Boundary Report which provided the final justification for areas which were disputed (be it either in or out). The large tract of land in Kirdford and Plaistow was one such area of dispute and thus has its own small section within the Report. The Inspector concluded:

‘Beyond the designation boundary “there are other areas of land of high landscape quality and especially nature conservation value, notably in the Plaistow Parishbut the visual links to the Greensand ridges to the west and to a lesser extent the overall quality of the landscape, tends to decline as one travel eastwards” ‘

So the quality and condition of this landscape was not in dispute, it was just deemed to be too far removed visually from the greensand ridge and the heart of the designation. Additionally, the high quality, deeply rural and coherent character of this landscape is acknowledged in greater detail within the Inspectors Report (Volume 1, March 2006). This is available to read on the SDNP core document library, accessible from their [website](#).

Together, the CDC Study, the setting to the SDNP and SDNP Boundary Report all point to a landscape that was and still is, of high quality and sensitivity. They identify its deeply rural, tranquil and remote character - acknowledged as a rare thing in South-East. These important and valued characteristics are acknowledged in CDC Policy, but are poorly recognised and understood in the application documents and the resultant type, scale, and design of the proposals generates harmful negative impacts upon them, which again have gone unacknowledged in the LVIA.

- d. All public bodies - including CDC have a ‘duty of regard’ to National Parks’ Purposes and Duty through the National Parks and Access to the Countryside Act (1949). Details of the legislative requirements on public Authorities are set out in the Defra Circular (2010). [https:// assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/ 221086/pb13387-vision-circular2010.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/221086/pb13387-vision-circular2010.pdf)

4. Landscape impacts and examples of conflicts with Policy

Those policies that this Proposal is considered to be in direct conflict with are set out at the start of this letter. Some more detail is provided as examples below.

Policy 48

1 - Setting please see above.

1 - tranquil and rural character

The following are examples (not exhaustive) of how the proposal conflicts with this part of the Policy:

- The proposal creates; hubs, venues, events (some unknown) and destinations. These, be them day-to-day uses or special events will generate adverse effects upon tranquillity and the deeply rural qualities which characterise this landscape.
- Sustainability in transport terms is poor, served only by characteristically quiet, narrow and historic rural lanes. The increase in vehicle numbers and scale is significant for *this* land-

scape and will have negative effects upon this landscape's remote, deeply rural and tranquil character, identified in CDCs own evidence-base. This effect both within the site, its wider context and in-combination with other proposals, has not been assessed in the LVIA.

- Linked to the point above the sheer scale and type of uses, in combination with the site's location in a deeply rural and remote landscape, means the Proposal requires many large car parks. These create a fundamental shift in character from remote, rural and tranquil to busy and suburban/'out of town'. The type and scale of uses proposed will be highly incongruous, adversely affecting this remote sense of place.
- The scheme uses the site's most tranquil areas - the ancient woodlands and farthest fields near Hardnips Barn as a focus of activity, much of which is proposed to be largely out of doors. Glamping, weddings and events in/access to irreplaceable ancient woodland habitats.

2 and 3 understanding distinctive character and respecting and enhancing it

Overall, this landscape has not been adequately understood.

In summary, this is a **historic, pastoral agricultural landscape**. This typically Wealden character has largely been acknowledged in the LVIA. It is also characterised by its perceptual qualities, which are highly valued locally, such as a sense of remoteness and a deeply rural and tranquil character. But in direct conflict with this;

- The proposal largely comprises uses which:
 - are not agricultural and
 - do not require an *agricultural* landscape for their location, and
 - do not support agriculture or facilitate rural land-management.
- Horses will be 'kept' and not 'grazed' requiring a change of use of the land from agriculture to equestrian. They will not sensitively manage this pastoral (grazed) landscape. Instead, their feed will be brought in by lorry.
- Offices, even if agri-tech, do not *need* to be located in a deeply rural, remote agricultural landscape, and it is not demonstrated that they support, or help to maintain sustainable agricultural land management needed to maintain and enhance landscape character.
- The Proposal provides for grooms' accommodation, but nothing for agricultural workers. Yet it is the agricultural (not equestrian) character which should be respected and enhanced.
- No livestock housing/handling, feed-store, farm machinery (storage) is proposed.
- All of the uses require car parks, lighting and other non-agricultural paraphernalia. Car parks are not characteristic of an agricultural landscape they are the opposite, nor do they help to contribute to the local distinctive qualities of this historic farmstead. Instead, they - and the uses they support - are likely to undermine character and sense of place, and create a poor quality 'anywhere' development, which does not need to be in a sensitive agricultural landscape of this quality.
- Retaining the 'working farm' character is used in the LVIA as mitigation for the loss of the 'fieldscape' or pastoral character. Yet the design and uses proposed all but erode this character. This is a significant conflict within the Proposal. Some of the farming proposals (pigs in ancient woodland) themselves generate harm. At best, farming will comprise the minority of the Site's future use and it has had the least consideration in terms of detail provided within the application. It has not been demonstrated that this mitigation can be successfully delivered, so the negative effects will likely remain, and landscape character would be eroded and not enhanced.
- A new access is proposed, duplicating the existing, and of an inappropriate scale for such a historic route. The over-sized visibility splay, tracks (designed for an agricultural need which

is not demonstrated) and rights of way through sensitive ancient woodland continue to undermine the basic rural character of the site. Proposed PRoW 'improvements' and interpretation panels and signage all undermine the remote, deeply rural character of this landscape.

- The hierarchy (and therefore character) of routes is undermined. This is because the routes within the site are proposed to be larger than Rickman's Lane itself.
- The ancient routeways are a key characteristic of the rural, remote sense of place so valued in this landscape. These have not been understood or assessed thoroughly in the LVIA.
- The LVIA fails to provide an assessment of effects upon key perceptual qualities such as tranquillity, or Dark Skies.
- The LVIA acknowledges the character of the approach to Crouchlands would become 'less rural'. In a deeply rural landscape this is a negative, yet it is expressed positively in the assessment.

4. Agricultural land

NPPF 174. Planning policies and decisions should contribute to and enhance the natural and local environment by:

(b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

The Agricultural Land Report does not address whether the land subject to the changes of use proposed would be considered the 'best and most versatile'. Nor does it provide mapped evidence relating to soil quality. The Report only makes reference to existing publicly available data for the local area. This data classes some of the land as Grade 3. It fails to differentiate between Grade 3a (considered to fall under the 'best and most versatile' category referenced in the NPPF above), and Grade 3b which would not.

It is recommended evidence for this should be made available to ensure 174 b) and CDCs own Policy 48 4) can be adequately considered. This lacking evidence is further demonstration that the design development has not been undertaken sensitively - i.e. landscape-led.

The application has failed to recognise the intrinsic character and beauty of this landscape, and makes poor reference to natural capital and ecosystem services.

5. Adverse impacts upon the individual identity of the settlement

Crouchlands is a historic farmstead - acknowledged in the Heritage Statement, but not used to inform a sensitive layout or landscape-led design and impacts upon it are underestimated. Small-scale historic farmsteads comprise the majority of the Low Weald's dispersed settlement pattern (NCA 121 - Low Weald (Natural England)). Their small scale and dispersed character gives rise to sense of remoteness, tranquillity and dark skies. Qualities which contribute enormously to this locally valued landscape. The small-scale character and its importance is further reinforced in CDCs own evidence base (terra firma 2019), copied above.

- The proposal achieves little of terra firma's recommendation.
- The scheme proposes significant expansion into fields, undermining the predominantly open and undeveloped land between settlements. It subsumes important dispersed (i.e., isolated in the countryside) historic farmsteads (including listed buildings) like Lanlands and Crouchlands into this development and at an uncharacteristically large-scale. This is likely to negatively affect their own rural, remote, agricultural setting.
- The sheer scale, poor layout, numerous car parks, and poor quality of the architecture fails to be locally distinctive or contribute positively to the site's typically Wealden, agricultural

- identity. These all combine to undermine and significantly harm the individual identity of this rural settlement.
- The architectural quality of buildings in this landscape and the Parish is high. The design and detailed architecture in this proposal fails to sensitively contribute to the distinctive local (agricultural) character of this farmstead or meet this high standard.
 - The proposed out-of-scale buildings fail to recognise and be sensitive to local patterns of development and local mass and scale of characteristic agricultural and rural buildings.

5. Landscape-led Approach to Design

Whilst the landscape-led approach has been referenced throughout the application, and a lot in the consultation literature to the public, I consider it has not been achieved. The South Downs National Park adopted Design Guide SPD, 2022 provides a recent definition:

‘Design, which is strongly informed by understanding the essential character of the site and its context (the landscape), creates development which speaks of its location, responds to local character and fits well into its environment. It needs to conserve and enhance the natural beauty, wildlife and cultural heritage of the area and create sustainable and successful places for people.’

Importantly, the Approach is not a ‘one-off’ undertaking, it is a continuous process of design which works at all scales, from determining an initial site location and capacity, right down to architectural and planting details. SDNPA also put it in more plain terms - it is ‘good contextual design’.

The fact that the site lies within the setting of the SDNP, ultimately ‘adds weight’ to:

- The need for a sensitive, landscape-led design approach.
- Makes it more reasonable to expect that best practice is followed in order to minimise harm and deliver a scheme of the highest quality in all aspects.

The LVIA sets out the commissioning brief to the landscape architects on page 3, at paragraph 1.1. This clearly states the landscape architects were commissioned to assess the landscape and visual effects of a proposal. It does not state they were commissioned to gather the evidence or play a part in informing the type, scale and layout of a scheme, then go on to assess its effects. Nor has any pre-design documentation or evidence been submitted in support of the assertion it has been landscape-led.

Conclusion

The numerous and fundamental adverse effects upon landscape, along with clear conflicts with Policy strongly suggests the small-scale nature of change and sensitive approach required to developing in this landscape has been wildly missed. The result is a scheme of incongruous scale and unrelated uses, which is likely to generate significant adverse effects upon this valued rural landscape and its role in forming the setting of the South Downs National Park. These physical effects in turn remove people’s ability to experience positive and valued perceptual qualities; tranquillity, a sense of a deeply rural, remote and historic landscape, and its dark skies.

APPENDIX

Landscape definition (European Landscape Convention, 2004 (Council of Europe)):

‘An area, as perceived by people, whose character is the result of the action and interaction of nature and/or human factors’

- This means, landscape is everything people perceive. It includes; roads, buildings, water, soils as well as the countryside and qualities like tranquillity. It also makes clear it includes landscape's that are outstanding, everyday or degraded.

Landscape Character definition (Natural England, 2014):

'A distinct, recognisable and consistent pattern of elements, that makes one landscape different from another, rather than better or worse.'