

#1113/1

South Downs National Park Inquiry 2008 – Topic 4
Additional Areas Recommended for inclusion in any
National Park

**LAND KNOWN AS THE RMC WORKSHOP COMPLEX,
STORRINGTON ROAD, WASHINGTON**

Proof of Evidence of Karen Roberts

On behalf of Cemex Investments Limited

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RPS
Lakesbury House
Hiltingbury Road
Chandlers Ford
Hampshire SO53 5SS

Tel. 023 8081 0440
Fax. 023 8081 0449
Email. rpsso@rpsgroup.com

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Appendices & Figures (refer to separate document no. 1113/1/2)

1 Introduction

Qualifications and Experience

- 1.1 My name is Karen Roberts. I am a Chartered Landscape Architect. I hold a Degree and a Diploma in Landscape Architecture and have over 22 years experience in private practice, 20 years post Membership of the Landscape Institute. During this period I have advised on the design and assessment of various central government, local government and private commercial infrastructure schemes in both urban and rural areas.
- 1.2 I have prepared and given evidence on landscape and visual impact at public inquiries for various forms of development and on landscape planning policy, including sites set within the context of nationally and regionally designated landscapes.
- 1.3 I am an Operational Director for the environmental consultancy RPS. Since 1992, I have managed the Solent office of RPS. We provide landscape and urban design advice for the assessment, masterplanning, detail design, implementation and management of a broad range of public and commercial projects.

Scope of Evidence

- 1.4 I have been appointed by Cemex in relation to their interests in the land known as The RMC Workshop Complex, Storrington Road, Washington; also referred to as the Washington Workshop Complex and hereinafter referred to as 'the site' (see Location Plan, Figure 1). The RMC Workshop Complex is owned by RMC Engineering and Transport Limited, of which Cemex Investments Limited is the holding company.
- 1.5 In my evidence I make reference to figures and appendices which are contained in a separate document which accompanies my proof of evidence reference no. 1113/1/2.
- 1.6 The Inspector's Report [SDNP 07 – CD3, Volume 1, part 2, page 117, paragraphs 7.244 and 7.246], recommended that the proposed South Downs National Park (SDNP) boundary should be amended to include adjacent areas of land to the east of the site known as Washington Common and Warren Hill (which includes East

Clayton Farm). In drawing up the revised boundary the Workshop Complex site was also included in DEFRA's proposed SDNP map. These areas are identified by DEFRA as Addition Area 5, Washington Common [SDNP07– CD7].

- 1.7 By reference to both the statutory purposes of National Parks and use of the criteria used by Natural England (NE), formerly the Countryside Agency (CA) in determining the boundary to the proposed South Downs National Park (SDNP), I will demonstrate that the site does not meet the criteria for inclusion and should remain outside the proposed SDNP boundary.

2 Site Description

- 2.1 The site lies to the north of the A283. It is bordered to the west by Hampers Lane and the large areas of active sand extraction workings at Sandgate Quarry.
- 2.2 To the north, the site is adjoined by the boundary of the suburban residential areas of Storrington and Heath Common. To the east the site borders the National Trust's (NT) land at East Clayton Farm and to the south east some commercially run kennels.
- 2.3 The site is approximately 10.5 ha and comprises landfill and large industrial buildings and workshops set in expanses of concrete and bitumen paving as illustrated in photographs 1 to 4, Figures 2 and 3 and plan Figure 4. The landfill to the south is made up of large partially covered concrete cubes originally thought to have been used on the south coast beaches in the 1940's – refer to photograph 5, Figure 3. The northern area of the site is made up of terraced landfill as shown in photograph 6, Figure 3 and some small but deep drainage ponds with steep edges. The site was semi restored in 1996 to accord with conditions attached to its use as a landfill site – refer to Appendix A. The restoration work included some profiling and sporadic areas of tree planting which is now semi mature. Little grassland has established in the past 12 years and the fill areas are now primarily covered with pioneer plant species such as moss, bramble, easel, thistle, Rosebay willow herb and buddleia. The site generally slopes to the south in terraces and lies at lower levels (up to approximately 12 metres) below the level of adjacent land.
- 2.4 The site is fully fenced and access is via locked metal plate gates off the A283. There is no public access on or to the site. The dilapidated state of the buildings, deep water ponds, steep embankments which have regularly slipped in places, amongst other concerns, make this site hazardous for general access.

3 Landscape Assessment

District Character Assessment

- 3.1 The site is included in Area E1 (Parham and Storrington Wooded Farmlands and Heaths) of Horsham District Council's Landscape Character Assessment [SDNP 2004, CD 195].
- 3.2 Key characteristics of which are:
- *Rolling landform of sandy ridges cut by small narrow stream valleys.*
 - *Extensive pine and oak-birch woodland. Linear streamside woods. Small areas of heathland, such as Sullington Warren Golf Course.*
 - *Small, mostly well hedged pasture fields with mature hedgerow oaks.*
 - *Major areas of sand and gravel extraction at Sandgate Park and Rock Common.*
 - *Scattered farmsteads and cottages along roads. Traditional local materials of sandstone, half timber and plaster and brick.*

RPS Landscape Assessment

- 3.3 In January 2008, I carried out a landscape character assessment with a colleague from RPS, of the site and the adjacent local area. The assessment was done using methodology based on the Landscape Character Assessment Guidance for England and Scotland CA 2002 [SDNP 2004, CD 57].

The landscape character areas defined by that assessment are illustrated on Figure 5 and the detailed survey sheets are included in Appendix B. The areas defined are:

- 3.4 Area A. Sandgate Quarries

Existing Landscape Quality: Poor (extensively disturbed by current and previous sand extraction and processing workings). Disturbed and in places derelict land and buildings. The landscape structure is degraded and it's characteristic patterns are

now determined by large scale terraced mineral extractions. The majority of the land is now at a lower level than adjacent areas of landscape. The extraction has and is progressing east to west. The eastern sector includes the site where active workings have ceased and the section owned by Hanson which is infrequently worked and where the sand is showing signs of vegetation creeping in. The large western sector is highly active with fresh cut working faces revealing clean sand.

Existing Landscape Value: Low. The land has no current national or local landscape designations. The character area is degraded and damaged and is of Poor landscape quality. The northern strip is of potential local value with a long-term objective for it to become a Country Park. As land levels are reduced there are limited opportunities for views out to the scenic downland scarp to the south. Generally, views into the area are restricted to the east, the south and the west by peripheral boundary vegetation. Fragmented views into the area can be gained through boundary vegetation from the suburban residential settlement to the north.

3.5 Area B. Heath Common Suburban Residential

Landscape Quality: Ordinary. There is a distinguishable landscape structure of residential buildings, gardens and roads/ tracks interspersed with mature trees.

Landscape Value: Medium. The residential area is in part unusual due to its wooded/ heathland setting. The character area has no current national or local landscape designations.

3.6 Area C. Washington Common Woodland Ridge

Landscape Quality: Good. This is an attractive landscape with a distinctive landform (ridge) in association with woodland and heath.

Landscape Value: High. The wooded ridge has an attractive landscape quality and is of Good landscape quality. It is valued for its open access for informal recreation. Views are limited by its enclosed wooded cover. The character area has no current national or local landscape designations.

3.7 Area D. Sullington Open Pasturelands and Copses

Landscape Quality: Good. Attractive landscape with a distinct sense of place due to its well preserved pastoral landscape pattern defined by hedges and copses and with scenic open views across the valley to the South Downs escarpment to the south and wooded greensand ridge to the north.

Landscape Value: High (borrows from wider downland views and context). Part designated AONB. The landscape character area is of attractive scenic quality and is of Good landscape quality. The area is traversed by footpaths and bridleways.

3.8 Area E. South Downs Escarpment and Hangers

Landscape Quality: High. Inspirational scenic landscape has a strong sense of place and landscape structure predominantly due to the topography and wide open scenic views.

Landscape Value: Very High. Nationally designated AONB. Very attractive scenic quality and high landscape quality. Significant cultural heritage features and South Downs Way National Trail.

3.9 In summary, our assessment of the site and its surrounds indicates that the site is contiguous with the character of the quarry land to the west and that the landscape character changes on its northern, eastern and southern boundaries. The landscape quality of the site is poor and it is of low landscape value. It has no public access.

3.10 The site does not contribute to the open sweep of pastureland that connects the South Downs escarpment to the Greensand ridge at Washington Common due to its distinctly enclosed nature, its lack of quality and value and inaccessibility. There is a distinct boundary and obvious change in character between the site and the open pastureland at the NT's East Clayton Farm as shown in photographs 9 and 10, Figure 10.

3.11 There therefore appears to be no logic - based on the assessment of landscape character, value or quality, for extending the SDNP boundary to include the site.

4 Background to the Sites proposed inclusion within the South Downs National Park Boundary

- 4.1 The boundary to the Sussex Downs Area of Outstanding Natural Beauty (AONB) followed the A283 (see Figure 6). The designated area included land to the south of this road. The site has never been included within the Sussex Downs AONB.
- 4.2 The Sandgate Quarries and the site were not included within the Countryside Agency's (CA, 2002) proposed National Park boundary (see Figure 7), neither was the land to the east. In the Inspectors report [SDNP 07, CD 3, page 115], the CA's reasons for this exclusion were summarised as follows:

[at paragraph 7.237 CD3]:

"the restoration of Sandgate Park pit as part of the Sandgate Country Park indicates that mineral extraction could continue until 2042. Restoration is many years distant and in excess of the 20 year period to complete restoration deemed to be appropriate and reasonable in the New Forest National Park. The restoration programme also anticipates a restored landscape that would not be characteristic of the PSDNP. It is also relevant that immediately to the east of the Sandgate Park pit is the Washington Workshop complex. This includes disused engineering workshops and has been identified as a possible waste management centre".

[at paragraph 7.238 CD 3]:

"Washington Common is an attractive heathland landscape but it is separated from the National Park by poorer quality land at Warren Hill. The 3 year Property Management Plan identifies possible landscape options for East East Clayton Farm but no recommendations. There is no certainty that the future management of the farm will provide a landscape that satisfies the designation criteria".

- 4.3 In their evidence to the 2004 SDNP inquiry, [Inquiry Document no. 3152/2/1], the National Trust sought the inclusion of a wider area of land spanning from and including Sullington Warren to the west to Warren Hill to the east, including the Sandgate Park pits and East Clayton Farm. However, the NT did not offer any

evidence or appraisal of the site. In their evidence (at paragraph 2.1.3) it appears that they treat the site as part of Sandgate Park. On this basis there was no evidence before the inspector to rebut the original assessment by the CA, that the land did not meet the criteria.

4.4 The inspectors concludes [at paragraph 7.243, CD3]:

“Sandgate Park is a very large sand pit where mineral extraction may continue for several decades. Restoration will not be completed until well beyond the Agency’s 20 year time frame albeit that some partial restoration may take place at the pit at an earlier date. In my view this land does not satisfy the designation criteria”.

and [at paragraph 7.244, CD 3]:

“However, like the other National Trust land at Sullington Warren, the Agency considers that it is separated from the landscape to the south of the A283 by lesser quality land. At the outset of the designation process that might have been an appropriate assessment. Since then the situation has changed significantly. In recent years the land at Warren Hill has been altered and improved seemingly with landscape and conservation interests uppermost in mind. Many of the positive measures identified in the Trust’s Management Plan and Stewardship Agreement are already in place. The proposal to use the farmstead as a residential training and employment centre is itself an innovative and commendable initiative. In my judgement, Warren Hill farmland is no longer a tract of ill-managed land separating Washington Common from the high quality landscape south of the A283. Rather the land reads as part of a high quality sweep that extends north from the chalk escarpment to the wooded Greensand ridge of Washington Common”.

and recommends [at 7.246, CD 3]:

“That the designation order boundary be amended only insofar as it includes additional land at Washington Common/Warren Hill”.

4.5 Of note: (1) the emphasis is on the stewardship work which has increased the value of Warren Hill farmland which, does not extend to the site; (2) the Inspector gives no reason for including the site and it does not appear that anyone was advocating it’s inclusion other than as part of the wider Sandgate Quarry area, the area which the

inspector concludes, does not satisfy the designation criteria – it's inclusion appears to have been advocated by the National Trust, on the basis that the whole of the sand extraction area should be included - a suggestion that the inspector dismissed; (3) – the inspector makes no specific further reference to the Washington Workshop complex. The recommendation relates to land at Warren Hill in the Trust's Management Plan and Stewardship Agreement and farmland which is "no longer a track of ill managed land" and that "the land reads as part of a high quality sweep that extends north from the chalk escarpment to the wooded Greensand ridge of Washington Common". The site (referred to in paragraph 7.237 above as 'Washington Workshop complex') lies to the west of the land at Warren Hill, it is separate to the land in the NT's Management Plan and Stewardship Agreement and in my assessment it does not read as part of the 'high quality sweep' referred to above for the reasons explained in my paragraphs 3.9 and 3.10

- 4.6 My landscape assessment as discussed in Section 3 of my evidence concurs with the Inspector's assessment in relation to Washington Common and that the NT's land at East Clayton Farm reads as part of the high quality land that sweeps between the ridge of Washington Common to the north and the high chalk escarpment of the South Downs to the south.
- 4.7 However, my assessment of the site indicates that it's landscape character, quality and value is related to the Sandgate Quarry area to the west and that the landscape character and quality changes distinctly at the site's eastern and southern boundaries.
- 4.8 I have undertaken my own local landscape character assessment of the site and the surrounding area. Using the results of my study I have concluded that the site does not satisfy the criteria stated in the following:
- Section 5 (subsection 2) of the National Parks and Access to the Countryside Act 1949 [SDNP 2004, CD/1];
 - Countryside Agency's Board Paper 7 Minutes: (AP/ 00/30), July 2000: Approach to defining National Park Boundaries [SDNP 2004, CD/44].
- 4.9 Within the remainder of my evidence I will explain the reasons for my conclusion.

5 Consideration of the Site's landscape characteristics against the Statutory Criteria for designating National Parks

- 5.1 The statutory criteria for designating National Parks is contained within the National Parks and Access to the Countryside Act 1949, Section 5 (Subsection 2) [SDNP 2004, CD/1]. These are as follows:

“The said areas are those extensive tracts of country in England as to which it appears to Natural England that by reason of:

a) their natural beauty and

b) the opportunities they afford for open air recreation, having regard both of their character and to their position in relation to centres of population.”

- 5.2 In 2006, the Natural Environment and Rural Communities Act (NERC Act) received Royal Assent The following criteria were included for consideration [SDNP 2007, CD8]:

Part 5, Section 59 subsection 2A includes the following:

“(2A) Natural England may-

(a) when applying subsection (2)(a) in relation to an area, take into account its wildlife and cultural heritage, and

(b) when applying subsection (2)(b) in relation to that area, take into account the extent to which it is possible to promote opportunities for the understanding and enjoyment of its special qualities by the public”

- 5.3 In addition, Part 9, Section 99 includes the following:

“The fact that an area in England or Wales consists of or includes-

(a) land used for agriculture or woodlands,

(b) land used as a park, or

(c) any other area whose flora, fauna or physiographical features are partly the product of human intervention in the landscape,

does not prevent it from being treated, for the purposes of any enactment (whenever passed), as being an area of natural beauty (or of outstanding natural beauty)”

- 5.4 The detailed landscape assessment of the site undertaken by RPS is described in sections 2 and 3 of my evidence and clearly indicates that the site is not at all characteristic or representative of the core landscape of the South Downs and does not meet the criteria for natural beauty. Despite partial restoration it is my opinion that the site's landscape will not improve sufficiently to change this assessment.. The only possible basis for inclusion therefore is that there is no other clear boundary. That cannot be right, as explained in my evidence, there is a clearly defined boundary between the site and the more open pastureland of East Clayton Farm. The boundary is marked by stock fencing and a distinct delineation between the scrubby wooded boundary of the site and the open pasture fields.
- 5.5 The site does not currently have any public access and views over and into the site are restricted by its vegetated enclosure and its levels. The site is hazardous to access, special safety gear is currently required to be worn for protection. It would require substantial work and investment to make it safe for public access.
- 5.6 The site would have only local wildlife interest for reptiles, birds. The workings on the site have extensively disturbed the ground to a considerable depth. It has no ecological or cultural heritage designations.
- 5.7 The criteria introduced by the NERC Act, 2006, have been considered and do not change my assessment that the site does not meet the core statutory criteria for inclusion in the South Downs National Park.

6 Consideration of site's landscape characteristics against the Countryside Agency's criteria for determining the boundary to the proposed South Downs National Park

- 6.1 The countryside Agency's Board Paper 7 Minutes: (AP/00/30), July 2000: Approach to defining National Park Boundaries [SDNP 2004, CD 44] sets out the approach to defining the boundary to the proposed SDNP.
- 6.2 SDNP Designation Order 2002, Inquiry Position Paper 2, CA [SDNP 2004, CD 70], paragraph 32, page 16 confirms that the approach and considerations in [SDNP 2004, CD 44] were applied.
- 6.3 The 2002 SDNP Order did not include the site in the proposed National Park. The site was deemed by the CA not to meet the criteria as explained in paragraph 4.2 of my evidence.
- 6.4 I have reviewed the site using the approach and boundary setting considerations 2a to j, 3 and 4, set out in [SDNP 2004, CD 44] with my landscape assessment of the site and its local context.
- 6.5 (2a) *High Landscape Quality*: The site is a disused industrial and mineral workings and is part of an area of poor landscape quality.
- 6.6 (2b) *Landscape Character and Quality*: The site is not representative of the core landscape character areas of the South Downs. It is both different in character and of poor landscape quality.
- 6.7 (2c) *Marked by superior recreational experience*: The site has no public access. For the reasons explained in paragraph 5.4 and 5.5 of my evidence, the site does not and it would not provide a superior recreation experience.

- 6.8 (2d) *Land which contributes to the rural economy and community life:* the site is derelict, currently unused and has no public access. It does not contribute to the rural economy or the community.
- 6.9 (2e) *Distinguishable Physical Boundary:* The site does not meet the criteria for inclusion in the SDNP and would not be required in order to identify a distinguishable physical boundary to the National Park. An identifiable and distinct boundary exists on the eastern edge of the site which would perform far better in including high quality landscape within the SDNP and excluding the poor quality land.
- 6.10 (2f) *Administrative boundaries:* the site has not and does not need to be included within the proposed SDNP for administrative boundary purposes.
- 6.11 (2g) *Severance of town or villages:* would not apply to the site.
- 6.12 (2h) *Unightly development on the edge of a National Park should generally be excluded, but the possibility of its modification or screening should not be overlooked where the immediately surrounding country claims inclusion:* I include photographs showing the site and views of the site from the adjoining areas (see Figures 2, 3 and 8). The site would accord with the description “unightly development” no further restorative works are proposed and there are no approved plans to change its existing condition and thus the guidance would confirm that the site should be excluded from the National Park.
- 6.13 (2i) Land shown in the adopted minerals and local plan as to be worked for the quarrying and mining of important deposits on the margins of a National Park should normally be excluded from the Park unless there is a realistic expectation of restoration to a land use and quality with contributes to Park purposes: Horsham District Local Development Framework Plan 2007 identifies the northern sector of the site as part of a wider area of land allocated for a future Sandgate Country Park (Policy AL19), extracts from which are included in Appendix C. This allocation extends across the northern part of the Sandgate quarry workings. This re-emphasises the link between the site and the land to the west in terms of character and quality and land uses. However, the site has been semi-restored and no further improvements are currently planned. The Inspector’s Report, Volume 1, Part 2, page 116, para 7.243 [SDNP2007, CD 3] considers these future proposals and concludes

that the land does not meet the criteria and the delivery of the country park is “so distant that it falls well outside the Agency’s guidelines for including peripheral minerals sites in the PSDNP”.

- 6.14 (2j) *Features of scientific, historic or architecture value*: There are no locally or nationally designated features on the site.
- 6.15 (3) *Statutory criteria*: Section 5 of my evidence explains why the site fails to meet the statutory criteria.
- 6.16 (4) *Identifiable boundary and transition in quality*: The site’s inclusion could not be justified on the basis of providing a transition in landscape quality or an identifiable boundary. The land to the east of the site at East Clayton Farm and Warren Hill provides the open sweeping transitional landscape between the South Downs and the Greensand ridge at Washington Common. The western boundary of East Clayton Farm with the site would provide a clearly identifiable boundary to the proposed SDNP.
- 6.17 In summary, the site does not merit inclusion in the South Downs National Park based on the assessment guidance for identifying the National Park boundaries.
- 6.18 The boundary I would recommend for the National Park as illustrated on plan Figure 9. It would follow a physical and distinguishable boundary between areas of different landscape character and quality. It is an existing fenced boundary that marks a change in land ownership and a change between the peripheral scrub woodland of the site and open pastureland of East Clayton Farm.
- 6.19 The open pastureland to the east of the site forms the transitional landscape between the chalk escarpment of the South Downs and the Greensand ridge of Washington Common. I do not consider that the site reads as part of this transitional landscape.

7 Conclusions

- 7.1 The RMC Workshop complex site is an old mineral workings, industrial workshops and landfill site of approximately 10.5 ha. The site has been semi-restored to accord with conditions attached to it's former use as a landfill site. The site generally slopes to the south in terraces and lies at lower levels (up to approximately 12m below the level of adjacent land).
- 7.2 The site is fully fenced and gated and locked. There is no public access on or to the site. The site would be hazardous for general access.
- 7.3 In January 2008, RPS undertook a landscape character assessment of the site and the adjacent local area. The assessment was carried out using methodology based on the Landscape Character Assessment Guidance for England and Scotland 2002. The assessment found that the site was contiguous with the character of the Sandgate quarry land to the west and the landscape character changes on it's northern, eastern and southern boundaries.
- 7.4 The landscape quality of the site and the area to the west was found to be poor and of low value.
- 7.5 The site does not contribute to the open sweep of pastureland of East Clayton Farm and Warren Hill that help to connect the South Downs escarpment (to the south) to the Greensand ridge at Washington Common (to the north), due to it's distinctly enclosed nature, it's lack of quality and value and inaccessibility. There is a distinct boundary and obvious change in character between the site and the open pastureland at East Clayton Farm and Warren Hill.
- 7.6 There therefore appears to be no logic - based on the assessment of landscape character, value or quality, for extending the SDNP boundary to include the site.
- 7.7 The detailed landscape assessment of the site undertaken by RPS clearly indicates that the site is not at all characteristic or representative of the core landscape of the South Downs and does not meet the criteria for natural beauty. Despite partial restoration it is my opinion that the site's landscape will not improve sufficiently to change this assessment. The only possible basis for inclusion therefore is that there

is no other clear boundary. That cannot be right, as explained in my evidence, there is a clearly defined boundary between the site and the more open pastureland of East Clayton Farm. The boundary is marked by stock fencing and a distinct delineation between the scrubby wooded boundary of the site and the open pasture fields to the east.

- 7.8 The site does not currently have any public access and views over and into the site are restricted by its vegetated enclosure and its levels. The site is hazardous to access, special safety gear is currently required to be worn for protection. It would require substantial work and investment to make it safe for public access.
- 7.9 The site would have only local wildlife interest for reptiles, birds. The workings on the site have extensively disturbed the ground to a considerable depth. It has no ecological or cultural heritage designations.
- 7.10 The criteria introduced by the NERC Act, 2006, have been considered and do not change my assessment.
- 7.11 The site does not meet the core statutory criteria for inclusion in the South Downs National Park.
- 7.12 My review of the site using the approach and boundary setting considerations 2a to j, 3 and 4, set out in [SDNP 2004, CD 44] with my landscape assessment of the site and its local context, concluded that, the site does not merit inclusion in the South Downs National Park based on the assessment guidance for identifying the National Park boundaries.
- 7.13 The boundary I would recommend for the National Park is illustrated on plan Figure 9. It would follow a physical and distinguishable boundary between areas of different landscape character and quality. It is an existing fenced boundary that marks a change in land ownership and a change between the peripheral scrub woodland of the site and open pastureland of East Clayton Farm. It would exclude the land to the west, including the RMC Workshop Complex site – which fails to meet the criteria for inclusion in the proposed South Downs National Park on the basis of its poor quality, low value, lack of natural beauty and lack of access for open air recreation.