

Horsham District Local Plan
Reg 19 consultation draft

**Proposed strategic site allocation Policy HA2:
Land West of Ifield**

Independent Landscape Report

in support of representation by Rusper Parish Council

February 2024

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ENVIRONMENT ~ DESIGN ~ PROJECTS ~ MANAGEMENT

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SUMMARY

1. This report considers the landscape implications of the proposed site allocation and the adequacy of the environmental information available to inform the planning decision-making process in relation to the site. It has been commissioned by Rusper Parish Council.
2. The sustainability appraisal makes clear that it only addresses the land proposed for 3,000 homes. However, the proposed development of 3,000 homes cannot be divorced from potential further development leading to a total of 10,000 homes, or from the construction of the entire western link road. The proposed allocation therefore needs to consider the environmental implications of the construction of the whole of the western link road and of potential residential development of 10,000 homes.
3. The proposed HA2 allocation for 3,000 homes cannot be considered in isolation from the stated aspiration of the site promoter to deliver 10,000 homes. To seek to do so as the Reg 19 draft Local Plan does is illogical and incompatible with the principles of good planning.
4. The development of 3,000 homes as proposed in the draft Local Plan on a rural site of acknowledged landscape sensitivity would inevitably result in adverse landscape and visual effects, which in my view would include many that would be significant in EIA terms. Insufficient evidence has been provided to demonstrate that these adverse effects could be reduced to an acceptable level through embedded or secondary mitigation measures.
5. There is a serious deficit in the level of environmental information available and a lack of clarity over the proposed development including a seriously inadequate masterplan. The extent of these deficiencies is particularly apparent in the context of the stated aspirations to deliver a 'garden town' and a 'landscape-led' development.
6. The West of Ifield allocation site is being proposed without any Landscape and Visual Impact Assessment (LVIA) having been made publicly available. It appears that Homes England has carried out at least some level of LVIA work, but it is not known to what level of detail it was undertaken and it has not been made publicly available.
7. Given that full LVIA studies are routinely undertaken either by the local planning authority or by the scheme promoter for much smaller housing allocation sites, it is a reasonable expectation that, before any decisions are taken to confirm site allocations, a full LVIA should be undertaken for a proposed development of 3,000 homes on rural land identified as being sensitive in landscape terms.
8. The EIA scoping report gives rise to serious cause for concern over the approach that Homes England proposes to adopt in relation to landscape and visual impact assessment.

9. There are significant deficiencies in the Council's sustainability appraisal in relation to the proposed allocation, most notably the attempt to divorce the proposed allocation for 3,000 homes from the linked aspiration by the same promoter for 10,000 homes.
10. Neither the overall impact on tranquillity nor the more specific impact on light pollution have been adequately assessed by the Council in the draft Local Plan [1] or the accompanying Sustainability Appraisal [2]. Any large-scale new residential development will have an impact on tranquillity, and this impact has not been quantified. Neither the landscape nor the ecological significance have been addressed in any meaningful way by the Council in its site allocation processes. Neither proposed Policy HA2 nor its supporting text make any mention of the harm that would be caused by loss of tranquillity and increase in light pollution.
11. Both the HA2 land and the 10,000 scheme land currently enjoy a high degree of tranquillity, comparable to levels within many parts of the High Weald National Landscape (AONB), and indeed are more tranquil than some parts of the National Landscape immediately south of the A264.
12. Although it is subject to some aircraft noise from the nearby Gatwick airport, the HA2 land benefits from dark skies and very low levels of light pollution, notwithstanding the proximity of Crawley and the airport.
13. Residential development would inevitably bring increased levels of noise, traffic, artificial lighting and human activity that would have a radical and adverse effect on the peace and tranquillity of this rural land.
14. It is inevitable that the proposed development would result in a loss of tranquillity. In my view the increase in light pollution from residential development of 3,000 homes in this location would be likely to be considerable, and that of the development of 10,000 homes would be correspondingly greater.
15. Were development of 10,000 homes to occur, this would result in a coalescence of settlements contrary to current and proposed local plan policy. The likelihood of initial development of 3,000 homes leading to ultimate development of 10,000 homes is substantial.
16. The need for mitigation to address adverse landscape and visual impacts is acknowledged in the EIA scoping report but inadequate information has been provided to establish the nature of the proposed mitigation measures and how effective they might be.
17. There is no evidence that landscape and visual impacts have been adequately considered in the current development proposal or that the key 'garden settlement' principle of enhancing the natural environment would be met.
18. The draft Local Plan fails the test of soundness in respect of proposed allocation HA2 West of Ifield because:

- (1) Appropriate and proportionate evidence on the landscape implications of the proposed development has not been provided; and
- (2) Given the strong likelihood that the proposed allocation would be the first step towards the development of circa 10,000 homes across a wider area that would adversely affect the High Weald National Landscape (AONB) and its setting, it does not comply with the requirements of paragraphs 174 and 176 of the NPPF.

1 Introduction

- 1.1 I am a Fellow and Past President of the Landscape Institute, now working as an independent consultant. I have over 35 years' experience of environmental planning and design, including many years as Head of Environmental Design at New Forest District Council, and have presented landscape evidence at Public Inquiry for numerous sites, including sites in and around the High Weald National Landscape (AONB). Current clients include Bath & North East Somerset Council for whom I regularly provide landscape and design advice to on the implications of development proposals within the City of Bath double World Heritage Site and its setting, and within or affecting the setting of the Cotswolds and Mendips National Landscapes. A summary of my qualifications and experience is given in Annex 2.
- 1.2 The Reg 19 draft Local Plan proposes an allocation of land West of Ifield (Policy HA2) for new residential development of 3,000 homes, but the stated aspiration of the scheme promoters Homes England is to deliver 10,000 homes covering a more extensive area. These will be referred to in this report as the '3,000 scheme' and the '10,000 scheme' respectively.
- 1.3 My report considers the landscape implications of the proposed site allocation and the adequacy of the environmental information available to inform the planning decision-making process in relation to the site. It has been commissioned by Ruspur Parish Council.
- 1.4 I viewed the proposed allocation land and the surrounding area from publicly accessible locations during November 2022, including daytime and night-time observations, and have based my report on publicly available sources of information and on my own experience.

2 Proposed development allocation

Linkage of 3,000 scheme and 10,000 scheme

- 2.1 The draft Local Plan [1] proposes a strategic allocation of land West of Ifield (HA2) for residential development of 3,000 homes, but the stated aspiration of the scheme promoter (Homes England) is to secure a much larger growth area of residential development of 10,000 homes. Residential development (of either 3,000 or 10,000 homes) in this area would be dependent on the construction of a 'Western Link Road' for which land is proposed to be safeguarded in the draft Plan (referred to as the 'Crawley Western Multi-Modal Corridor').
- 2.2 The strategic allocation is referenced SA101 in the sustainability appraisal [2] and suggests that the proposed development of 3,000 homes would include the 'first phase of a potential future western link road from the A264 to the A23 in the north'. In order to function as a link road, the proposed new transport route needs to be connected at both ends, and indeed this is what the safeguarded corridor in the draft Plan proposes.
- 2.3 The sustainability appraisal makes clear that it only addresses the land proposed for 3,000 homes. However, the proposed development of 3,000 homes cannot be divorced from potential further development leading to a total of 10,000 homes, or from the construction of the entire western link road. The proposed allocation therefore needs to consider the environmental implications of the construction of the whole of the western link road and of potential residential development of 10,000 homes. There is no reference in the sustainability appraisal to the landscape implications of the construction of either the whole of the western link road or to the section of it that would run through the SA101 land, so it is unclear whether or not there has been any assessment of this.

'Garden towns' and 'landscape led' development

- 2.4 The sustainability appraisal refers to the site promoter Homes England's description of the proposed development as a 'garden town' and suggests that there is a commitment to a 'landscape-led' scheme of development.
- 2.5 As a public body sponsored by the Department of Levelling Up, Housing and Communities, it is assumed that Homes England will be aware that the government uses the terminology 'garden towns' and 'garden cities' for developments of more than 10,000 homes and 'garden villages' for developments of 1,500 – 10,000 homes [DCLG 2016 'Locally-led Garden Villages, Towns and Cities'] [3]. It is abundantly clear that Homes England see the 3,000 homes as merely the initial phase of a much larger development.

- 2.6 The proposed HA2 allocation is accompanied by a rudimentary diagrammatic masterplan (Fig 7: Reg 19 draft Plan, p193) [1]. The EIA scoping report [4] refers to the existence of a 'landscape masterplan' but this does not appear to be publicly available. Many developers claim that their intention is to bring forward 'landscape-led' schemes, but sadly in my experience results on the ground rarely reflect such commendable aspirations. If the stated aspirations to create a 'landscape-led' form of development and a 'garden town' of whatever size are to be taken seriously, and are not merely empty rhetoric, then as an absolute minimum they would need to be supported by evidence of robust landscape analysis and a detailed landscape masterplan. To date, there is insufficient evidence of analysis or landscape masterplanning to give any confidence that the stated aspirations would be realised.

Western link road

- 2.7 The belt of land safeguarded for the Western Link Road is approximately 140m wide and 6km in length, so covers an area of approximately 84 hectares, the majority of which lies within areas identified in the 2021 landscape capacity assessment [2] as being the most sensitive in landscape terms, being unable or having only very limited potential to accommodate development. Although the 2021 assessment focussed in particular on capacity to accommodate housing or employment development, it is reasonable to conclude that areas with the lowest capacity to accept those categories of development are also the least likely to be able to satisfactorily accommodate major transport infrastructure without unacceptable adverse impact.
- 2.8 The proposed link road would most notably affect Local Landscape Character Areas 4, 8 and 10 of the 2021 assessment.

3 Landscape policy context

National policy

- 3.1 Although there were further changes made in December 2023, national policy relevant to this plan is set out in the National Planning Policy Framework September 2023 (NPPF), which gives strong support for good design and for protection and enhancement of natural and historic environmental assets. NPPF paragraph 174 requires planning policies and decisions to contribute to and enhance the natural and local environment by (inter alia):
- a) *Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)*
 - b) *Recognising the intrinsic character and beauty of the countryside...*
- 3.2 The High Weald National Landscape (AONB) is a ‘valued landscape’ for the purposes of paragraph 174. In addition, NPPF paragraph 176 states that great weight should be given to conserving and enhancing landscape and scenic beauty in nationally designated landscape areas (National Parks, the Broads and AONBs), which have the highest status of protection in relation to these issues, and that development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated area.
- 3.3 The NPPF also puts considerable emphasis on the historic environment and sets out requirements for the protection and enhancement of designated and non-designated historic assets, including their setting (paragraphs 189–208). The Ifield Conservation Area is a designated heritage asset whose setting would be affected by the proposed development.
- 3.4 NPPF paragraph 185 requires that policies and decisions should ensure that new development is appropriate for its location, taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to the impacts that could arise from the development. The word pollution in this context explicitly refers to noise disturbance and light pollution, and the policy requirements include:
- a) *Mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – avoid noise giving rise to significant adverse impacts on health and quality of life; and*
 - c) *Limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.*
- 3.5 A fundamental principle of the planning system is that decisions should be evidence based, and that the level of information made available to support good decision-making should be proportionate to the scale, scope and

significance of the development or policy under consideration. NPPF paragraph 35 sets out tests of ‘soundness’ for Local Plans and emphasises that plans and strategies must take into account reasonable alternatives and be based on proportionate evidence.

Local plan policy

- 3.6 The adopted local plan is the Horsham District Planning Framework (Nov 2015) [5] and the emerging local plan is the Reg 19 draft Horsham District Local Plan 2023-40 (Dec 2023) [1].

Horsham District Planning Framework 2015

- 3.7 The Planning Framework states (para 3.10) that

‘The rich heritage and high quality natural environment and the significant contribution this makes to the overall attractiveness, economic competitiveness and identity of the district is recognised and promoted...’

- 3.8 It further states (para 3.26) that

‘...the environment and character of the district play a key role in the local and wider economy through environmental services that it provides... ..it is therefore critical that the character (of) the district is conserved and enhanced...’

- 3.9 Policy 2 (Strategic Development) states its overall purpose as being:

‘To maintain the district’s unique rural character whilst ensuring that the needs of the community are met through sustainable growth...’

Goal (1) is to “focus development in and around the key settlement of Horsham”

Goal (6) is to “manage development around the edges of existing settlements in order to prevent the merging of settlements and to protect the rural character and landscape”.

Goal (12) is to “retain and enhance natural environmental resources, including landscapes and landscape character...”

- 3.10 Policy 4 (Settlement Expansion) states that the expansion of settlements will be supported where:

(1) The site is allocated in the Local Plan or in a Neighbourhood Plan and adjoins an existing settlement edge... and

- (5) *the development is contained within an existing defensible boundary and the landscape and townscape features are maintained and enhanced.*

- 3.11 Policy 25 (Natural Environment and Landscape Character) protects the natural environment and landscape character from inappropriate development and requires development to ‘Protect conserve and enhance landscape and townscape character... and ...maintain settlement separation.’
- 3.12 Policy 26 (Countryside Protection) protects the rural character and undeveloped nature of the countryside from inappropriate development and requires development to avoid causing a significant increase in the overall level of activity in the countryside and to protect and/or conserve and/or enhance the key features and characteristics of the landscape character area in which it is located.
- 3.13 Policy 27 (Settlement Coalescence) protects landscape from development which would result in the coalescence of settlements and sets out four tests that development between settlements must satisfy if it is to be deemed acceptable:
- (1) *No significant reduction in openness and ‘break’ between settlements;*
 - (2) *Does not generate urbanising effects within the settlement gap, including artificial lighting, development along key road corridors, and traffic movements;*
 - (3) *Is redevelopment of an existing site and reverses existing urbanising character;*
 - (4) *Contributes to the conservation, enhancement and amenity of the countryside.*
- 3.14 Policy 30 (Protected Landscapes) requires the natural beauty and public enjoyment of protected landscapes including the High Weald AONB to be conserved and enhanced. It requires proposals to have regard to the management plan for the landscape in question (in this instance the High Weald AONB Management Plan 2019-2024: 4th Edition) and to demonstrate how the key landscape features or components of natural beauty and the setting of the protected landscape will be conserved and enhanced.
- 3.15 Policy 34 (Cultural and Heritage Assets) requires development proposals to ‘retain and improve the setting of heritage assets, including views, public rights of way, trees and landscape features, including historic public realm features.’

Horsham District Local Plan - Reg 19 draft 2023

- 3.16 Strategic Policy 3 (Settlement Expansion) of the draft Plan requires development to be ‘contained within an existing defensible boundary and the landscape and townscape features are maintained and enhanced.’

- 3.17 Strategic Policy 11 (Environmental Protection) of the draft Plan requires development to minimise light pollution, and specifically to minimise the impact of lighting on neighbouring uses and on the wider landscape.
- 3.18 It also requires the ‘cumulative impact of all relevant committed development to be appropriately assessed’.
- 3.19 Strategic Policy 13 (Natural Environment and Landscape Character) of the draft Plan broadly carries forward Policy 25 of the adopted Plan and similarly protects the natural environment and landscape character from inappropriate development and requires development to:
- (1) Protect, conserve and enhance the landscape and townscape character... and ...maintain settlement separation.
- 3.20 Strategic Policy 14 (Countryside Protection) broadly carries forward Policy 26 of the adopted Plan and protects the rural character and undeveloped nature of the countryside from inappropriate development. It requires development to be appropriately integrated within the landscape and to be of a scale appropriate to its countryside character and location, and to avoid causing a significant increase in the overall level of activity in the countryside and to protect and/or conserve and/or enhance the key features and characteristics of the landscape character area in which it is located.
- 3.21 Strategic Policy 15 (Settlement Coalescence) broadly carries forward Policy 27 of the adopted Plan but clarifies and strengthens it. The policy protects landscapes from development which would result in the coalescence of settlements in order to protect local identity and a sense of place. It specifies the requirements to be met as:
- a) There is no significant reduction in openness and ‘break’ between settlements;
- b) The related urbanising effects within the retained ‘break’ between settlements are minimised, including artificial lighting, development along and/or the widening of the roads between settlements; and increased traffic movements;
- c) Proposals respect the landscape and contribute to the enhancement of their countryside setting including, where appropriate, enhancements to the Green Infrastructure network, the Nature Recovery Network and/or provide opportunities for quiet informal countryside recreation.
- 3.22 Strategic Policy 16 (Protected Landscapes) broadly carries forward the requirements of Policy 30 of the adopted Plan and includes an additional requirement relating to dark skies. The policy requires the natural beauty of the High Weald AONB to be conserved and enhanced, and that there will be no adverse impacts on the natural beauty of the protected landscape. It requires proposals to have regard to the relevant landscape management plan (in this instance the High Weald AONB Management Plan 2019-2024, 4th Edition [6]).

Neighbourhood Plan

- 3.23 The Ruser Neighbourhood Plan 2018-2031 [7] was made on 24 June 2021 and now forms part of the statutory development plan for the parish of Ruser. As part of the plan making process, the Neighbourhood Plan has been confirmed to satisfy the four 'basic conditions', namely that it is consistent with national planning policy, is consistent with local planning policy, promotes the principles of sustainable development and meets the requirements of European law.
- 3.24 In relation to housing development, the Neighbourhood Plan follows the 2018 HDC SHELLA map [8] and takes the position that there are no additional sites suitable for large scale housing in the parish beyond those areas for which planning permission has already been given.
- 3.25 Neighbourhood Plan Policy RUS10 (Dark Skies) requires all new development to be designed to minimise light pollution and stipulates that all new proposals must demonstrate how light pollution will be prevented.

High Weald AONB Management Plan

- 3.26 Horsham District Council has a legal duty under section 85 of the CROW Act 2000 to have regard to the purposes of the AONB (now known as a 'National Landscape') in making decisions that affect the designated area. In terms of planning policy, landscape outside a designated AONB has a lower degree of protection than landscape within the AONB, but the local planning authority must consider the effect of development outside the designated area on the setting of an AONB.
- 3.27 The objectives of the High Weald AONB are set out in its Management Plan 2019-2024 (4th Edition) [6]. Among the key characteristics of the AONB identified in the Management Plan under the heading 'Other perceived qualities' (page 59) are:
- *Scenic beauty and glimpsed long views*
 - *Unspoilt rural landscape with a sense of naturalness unusual in South East England*
 - *Intrinsically dark skies landscapes with a sense of remoteness and tranquillity*
 - *Human-scale landscape with a sense of intimacy.*
- 3.28 Objective OQ4 seeks to protect and promote the perceptual qualities that people value. The rationale reads:

‘To ensure that the special qualities people value, such as tranquillity, dark skies, sense of naturalness and clean air, are recognised and taken account of in AONB management.’

The indicator of success is set out as:

‘No loss of dark skies or tranquillity: HWJAC: CPRE tranquillity data and citizen science sky quality meter readings.’

4 Adequacy of environmental information

- 4.1 The UK planning system prides itself on being evidence-based. NPPF paragraph 43 states that ‘the right information is crucial to good decision-making’ and paragraph 35 sets out the tests that Local Plans are required to meet to be deemed ‘sound’. One of the tests is that Plans must be justified and must set out an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence.
- 4.2 The West of Ifield allocation site is being proposed without any Landscape and Visual Impact Assessment (LVIA) having been made publicly available. It appears that Homes England has carried out at least some level of LVIA work, but it is not known to what level of detail it was undertaken and it has not been made publicly available.
- 4.3 Given that full LVIA studies are routinely undertaken either by the local planning authority or by the scheme promoter for much smaller housing allocation sites, it is a reasonable expectation that, before any decisions are taken to confirm site allocations, a full LVIA should be undertaken for a proposed development of 3,000 homes on rural land identified as being sensitive in landscape terms.
- 4.4 It is inappropriate for the Council to consider the allocation of land for new residential development of the scale proposed in the absence of a full LVIA having been undertaken and made available. The reasonable requirement for proportionate evidence has not been met.

Environmental Statement scoping report

- 4.5 The covering letter to the 2023 EIA Scoping Report (EIASR) [4] submitted on behalf of Homes England indicates that preparations were well advanced by October 2023 for the submission of two planning applications, an outline for the principal elements supported by parameter plans and a masterplan, and a full application for early infrastructure.
- 4.6 The letter includes references to ‘increased design maturity’, ‘extensive surveys undertaken’ and ‘increased information to allow understanding of potential environmental effects’, so there is obviously a great deal of relevant information that now exists but, regrettably, very little if any of it has been made publicly available.
- 4.7 Paragraph 10.3.16 of the EIASR [4] helpfully confirms (with reference to Table 10.2) that landscape and visual effects at the ‘moderate’ as well as at the ‘major’ level are likely to be considered significant for EIA purposes.
- 4.8 Paragraphs 10.4.1 and 10.4.2 confirm that a considerable amount of survey and analysis has already been undertaken, including to ‘confirm the extent of the study area’ and to ‘confirm viewpoint locations’. Both of these are of

critical importance in ensuring that any LVIA is robust and covers the appropriate geographic area, but neither the extent of the study area nor the choice of viewpoints have been made public, denying the opportunity for informed comment by the communities affected.

- 4.9 The EIASR confirms (paragraph 10.4.4) that Ifield Conservation Area is a 'relevant landscape character and visual amenity related planning designation'. It should therefore be assessed within the LVIA using the same methodology as other landscape and visual receptors, rather than being scoped out of the LVIA and only dealt with within the Cultural Heritage chapter of the ES, which is likely to apply its own (different) methodology.
- 4.10 There appears to be a misunderstanding of GLVIA3 guidance [9]. Paragraph 10.4.6 indicates that landscape effects on the relevant National Character Area (NCA) will be scoped out of the LVIA. It is agreed that the effects on more local character areas will be greater, but given the scale of the proposed development it will be appropriate for the LVIA to include NCA 121 as a landscape receptor to be assessed in addition to the more local character areas. There is no justification in GLVIA3 for scoping out effects on the NCA.
- 4.11 There are numerous references to the 'LVIA study area' within the EIASR but no information has been provided as to the extent of the LVIA study area or how it has been determined.
- 4.12 The reference (paragraph 10.5.3) 'following the implementation of mitigation measures' is an explicit acknowledgement that there will be adverse effects that will require mitigation. The EIASR also confirms that night-time effects will be considered.
- 4.13 The EIASR (paragraph 10.5.4) acknowledges that there would be possible significant adverse effects on the landscape. However, given the references to mitigation at paragraphs 10.6.1 and 10.6.2 it is clear that Homes England recognise that there will definitely be adverse landscape effects.
- 4.14 Given that the allocation land is acknowledged in the strategic sustainability appraisal to be 'unfavourable' with respect to impact of residential development on the landscape, and that the threshold for significance has been set at 'moderate' or above in accordance with normal practice, it is inevitable that there will significant adverse landscape effects, and I anticipate that these would be widespread.
- 4.15 No evidence has been provided to justify the statement that the 'wider character area beyond the Site is not likely to experience significant effects due the high level of visual containment of the Site' and that this has therefore been scoped out. In the absence of such evidence, effects on landscape character beyond the site boundaries must be included in the assessment.
- 4.16 The EIASR acknowledges (paragraph 10.5.5) that there could be permanent significant adverse landscape effects even after the maturing of proposed mitigation measures.

- 4.17 Paragraph 10.6.1 refers to a ‘landscape masterplan’ for the proposed development which is said to have been informed by ‘initial landscape and visual assessments’. Neither the initial assessments nor the landscape masterplan appear to be available for public comment, so their adequacy cannot be determined.
- 4.18 The EIASR acknowledges (paragraph 10.6.2) that significant adverse landscape and visual effects are possible, and that if identified, additional (secondary) mitigation measures would be proposed to avoid or reduce such effects. In my view, significant adverse landscape and visual effects are not merely possible, they are inevitable, and therefore mitigation measures would definitely be required (as acknowledged at paragraph 10.5.3) and should be identified at this stage so that their adequacy can be open to community comment. Since it appears that the development allocation would not be environmentally acceptable in the absence of landscape mitigation measures, it is essential that the proposed mitigation measures are made available for public scrutiny.

Sustainability appraisal

- 4.19 As indicated at paragraphs 2.2 and 2.3 above, the sustainability appraisal [2] (SA) for SA101 (HA2) addresses only the 3,000 home allocation, notwithstanding the clearly stated intention by the scheme promoters that this should be merely the initial phase of a much larger 10,000 home development, and does not consider the environmental or wider sustainability implications of the whole of the western link road which would be essential infrastructure for either the larger or the smaller scheme. It is unclear to what extent the portion of the link road within the boundary of the proposed HA2 allocation has or has not been assessed, but since the road could only fulfil its function as a link road when properly connected at both ends, it would not be sufficient either for sustainability assessments or for wider planning purposes to exclude consideration of the environmental implications for the whole of the link road.
- 4.20 In respect of landscape, biodiversity, archaeology, cultural heritage and environmental quality the SA [2] concluded that the impacts would be unfavourable. In respect of ‘development quality’, the SA concluded that the impact would be favourable, on the basis that Homes England is ‘looking to deliver a landscape-led development’, that it is ‘currently preparing a site-wide framework design code’ and that it is a public body with a ‘responsibility to achieve good place-making and sustainable communities’. However, just because a body has a responsibility to achieve good place-making does not guarantee that it would happen, and no evidence has been provided on design codes or landscape analysis and masterplanning so the assumptions made in the SA in respect of design quality cannot be objectively tested.
- 4.21 In its overall conclusion, the SA acknowledges that ‘strategic development at this scale will have an impact on what is currently a generally rural landscape and there will be areas where the landscape is sensitive to development’. It

states that 'evidence demonstrates a multi-modal access corridor into the site', but makes no comment as to where this 'access corridor' goes beyond the site, how it links to the wider transport network, and what the environmental implications and wider sustainability implications of this would be.

5 Landscape capacity and likely scale of impact

Landscape characteristics of the site

- 5.1 The HA2 land lies within National Character Area 121 ‘Low Weald’ [10] and exhibits many of its key characteristics, including:
- Broad low-lying, gently undulating clay vales;
 - A generally pastoral landscape;
 - Many small rivers streams and watercourses with associated watermeadows and wet woodland;
 - A mix of woodland including ancient woodland, with veteran trees seen in hedgerows.

The NCA Profile notes that the Low Weald is a predominantly pastoral and wooded landscape that is still largely rural and relatively tranquil outside the main urban centres.

- 5.2 At a local level, as described in the 2003 Horsham District Landscape Character Assessment [11], the allocation land lies within the landscape character area K1 Upper Mole Farmlands, described as a flat to very gently undulating landscape crossed by the upper tributaries of the River Mole, predominantly pasture farmland with small to medium sized irregular field pattern and thick hedgerows.
- 5.3 Key sensitivities identified include large-scale residential development and incremental changes eroding rural character.
- 5.4 Management guidelines include the conservation of the mostly rural character of the area.
- 5.5 Although the proximity of Gatwick Airport and Crawley reduce tranquillity in this area, there is still a notable absence of light pollution during the hours of darkness, so the character of the area is particularly sensitive to any increase in light pollution such as that arising from large scale urban development.

Landscape capacity

- 5.6 A landscape capacity assessment was undertaken by Horsham District Council in 2014 and updated in 2021 [2]. The proposed HA2 allocation falls within Areas 4, 5, 6 and 7 of the 2021 capacity assessment.
- 5.7 Area 4 (River Mole) was assessed to have **no/low** capacity for residential development whether medium scale or large scale, where no/low is defined as

‘The area is unable or only has very limited potential to accommodate the specified type and scale of development without unacceptable adverse landscape and visual impacts or compromising the values attached to it, taking account of any appropriate mitigation’

- 5.8 Area 5 (land west of Ifield Brook) and Area 7 (Ifield Golf Course) were assessed as having **moderate** capacity for large scale housing, moderate being defined as

‘This area has an ability to accommodate development in some parts without unacceptable adverse landscape and visual impacts or compromising the values attached to it, taking account of any appropriate mitigation. There is a need for each proposal to be considered on its individual merits to ensure there are no unacceptable adverse effects.’

- 5.9 Area 6 (Rusper Road) was assessed to have **low/moderate** capacity for large scale housing, low/moderate being defined as:

‘The area only has potential to be able to accommodate development in limited locations without unacceptable adverse landscape and visual impacts or compromising the values attached to it, taking account of any mitigation’

Likely scale of impact

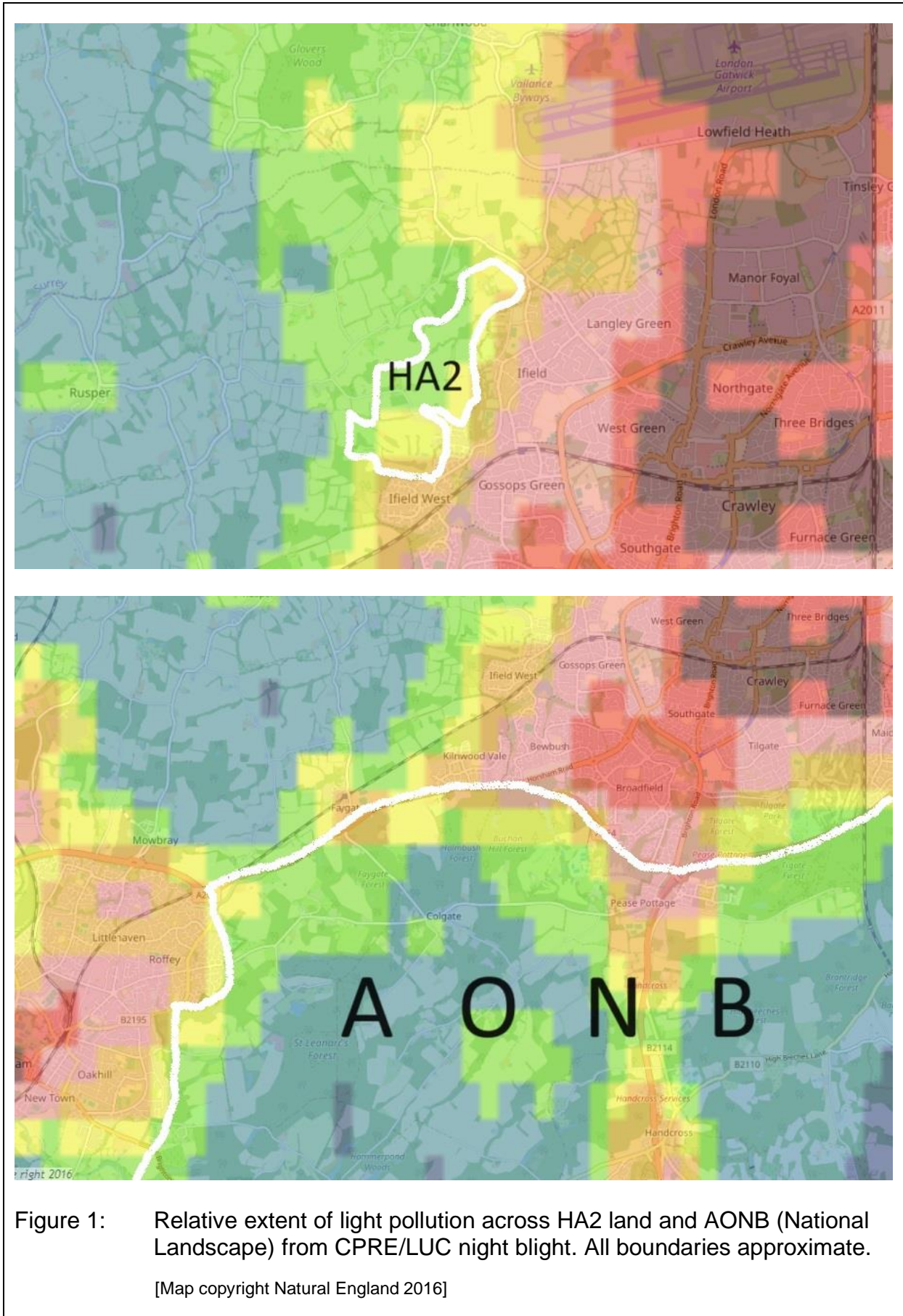
- 5.10 The masterplan included as Fig 7 in the draft Local Plan [1] is very crude and broad brush, so the intended form of development cannot be reliably determined, but appears to show that there would be no built development within Area 4, the most sensitive area in landscape terms, but that notwithstanding the inclusion of some landscape features, Areas 5, 6 and 7 would consist predominantly of built development.
- 5.11 For Areas 5 and 7, the 2021 assessment [2] thus judged that there was capacity to accommodate development **in some parts**. The proposal to accept built development over either the whole, or almost the whole, of these areas is therefore contrary to the Council’s own guidance on capacity and would, in my view, be likely to result in significant adverse landscape and visual impacts.
- 5.12 For Area 6, the 2021 assessment judged that there was only capacity to accommodate development **in limited locations**, so the proposal to accept built development over either the whole, or almost the whole, of this area is therefore also contrary to the Council’s own guidance on capacity, and similarly would, in my view, be likely to result in significant adverse landscape and visual impacts.
- 5.13 The characteristics of Area 4 (River Mole) as set out in the 2021 study include:
- Broad valley of the River Mole;
 - Distinctive meandering course with dense riverside vegetation;
 - Generally unspoilt rural character and in overall good condition;
 - Attractive countryside with good public footpath access.

- 5.14 The construction of the western link road within the safeguarded corridor would involve a total length of approximately 6km of which approximately 40% would lie within the proposed allocation land. The proposed route across the allocation land lies almost exclusively within Area 4 (River Mole) which the 2021 landscape capacity study judged to have the lowest capacity to accept major housing or employment development. It is reasonable to assume that the capacity to accommodate major transport infrastructure without unacceptable adverse impact would also be zero or extremely low, and that the construction of even this section of the link road would be likely to result in significant adverse landscape and visual impacts.
- 5.15 Since there is no logic in building half a link road, because by definition to function as a link road it needs to be connected at both ends (as indicated by the proposed safeguarding land in the draft Plan), it is clearly the intention for the whole 6km length of the link road to be provided. The southern section outside the HA2 allocation land also passes through extensive areas of land identified as being of high landscape sensitivity and having minimal capacity to accommodate large scale development without unacceptable adverse impact, so it must be the case that the construction of the southern section would result in additional significant adverse landscape and visual impacts, compounding the harm that would result from the construction of the northern section.
- 5.16 Were the wider 10,000 scheme to be developed, this would involve additional land including in Area 8 (Land North of Kilnwood), Area 10 (Kilnwood Copse to Graylands) and Area 11 (Faygate and Surrounds) that adjoins the High Weald National Landscape boundary to the south, all of which are identified in the 2021 assessment as having **no/low** (the lowest category) capacity for large scale housing. The adverse landscape and visual impacts should, in my view, be anticipated to be more significant, to cover a far more extensive geographic area, and to include significant adverse effects on the adjoining High Weald National Landscape (AONB) and its setting.

6 Tranquillity

- 6.1 Tranquillity is one of the qualities of the landscape that is increasingly under threat, especially in the Southeast where development pressure is so intense. Tranquillity is normally taken to mean an absence of visual intrusions, such as jarring or discordant elements in the view, as well as freedom from noise and light pollution.
- 6.2 No systematic mapping of tranquillity has been undertaken across its area by Horsham District Council, but a useful source of information has been produced by CPRE and LUC, who have mapped England's light pollution and dark skies [12].
- 6.3 Figure 1 below shows the light pollution map for the area including the HA2 land west of Ifield. The highest levels of artificial illumination are clearly visible as Crawley and Gatwick airport. Levels of light pollution fall rapidly as one heads west from Ifield and the majority of the proposed allocation land lies within the pale green (Band 4: 1-2 Nanowatts/cm²/sr) or the pale blue (Band 3: 0.5-1.0 nW/cm²/sr), very similar to the levels found with the High Weald AONB to the south of the A264. The map shows that the majority of the suburban areas including areas such as Ifield and Kilnwood Vale fall into Bands 6 (orange) or Band 7 (pink).
- 6.4 The 2003 district landscape character assessment [11] describes Area K1 (Upper Mole Farmlands) as being 'mostly rural in character' but states that it 'lacks tranquillity'. I disagree, and consider this an unhelpful oversimplification, no doubt reflecting the resources available at the time for the study, and the fact that the fieldwork would have been undertaken during daylight hours. The 2003 study makes assumptions about the proximity of Gatwick airport but does not comment separately on light pollution and noise pollution, key components of tranquillity which may not be the same.
- 6.5 Personal observation confirms the striking contrast between the suburban areas of Ifield and the proposed allocation land, where the experience of the latter is that the skies are notably dark notwithstanding the relative proximity of Crawley and Gatwick airport, and that the area is perceived to be both rural and peaceful.
- 6.6 Although the tranquillity of the allocation land is reduced to some extent by noise disturbance due to the proximity of Gatwick airport, it is not on the main flight paths which run east-west and it is not generally subject to any significant noise disturbance from road traffic, in contrast to the parts of the High Weald National Landscape (AONB) immediately south of the A264 which are subject to traffic noise.
- 6.7 In parts of the designated National Landscape, for example around Pease Pottage and in the vicinity of Kilnwood Vale, in addition to being subject to noise from road traffic, the levels of light pollution rise to the orange (Band 6:

- 4-8 nW/cm²/sr) and pink (Band 7: 8-16 nW/cm²/sr) levels. This is notably higher than the levels found on the HA2 land and the 10,000 scheme land.
- 6.8 New infrastructure, in particular the proposed Western Link Road, would introduce additional activity, noise and lighting. The number of homes proposed would give rise to increased lighting levels at night, and in the case of the 10,000 scheme land would have an adverse effect on the National Landscape and its setting.
- 6.9 The importance of light pollution, a key aspect of tranquillity, is increasingly recognised as a national policy issue. The NPPF now includes explicit reference to the need to minimise light pollution (paragraph 185 (c)).
- 6.10 The extent and significance of adverse effects of light pollution on wildlife is a matter of increasing concern to ecologists. Previously, attention was primarily focused on bats and moths, but it is now understood that a wide range of aquatic and terrestrial ecosystems are affected by artificial illumination at night – see for example the 2018 article in Nature: ‘The dark side of light: how artificial lighting is harming the natural world’ [13].
- 6.11 Neither the overall impact on tranquillity nor the more specific impact on light pollution have been adequately assessed by the Council in the draft Local Plan [1] or the accompanying Sustainability Appraisal [2]. Any large-scale new residential development will have an impact on tranquillity, and this impact has not been quantified. Neither the landscape nor the ecological significance have been addressed in any meaningful way by the Council in its site allocation processes. Neither proposed Policy HA2 nor its supporting text make any mention of the harm that would be caused by loss of tranquillity and increase in light pollution.
- 6.12 I conclude that
- Both the HA2 land and the 10,000 scheme land currently enjoy a high degree of tranquillity, comparable to levels within many parts of the High Weald National Landscape (AONB), and indeed are more tranquil than some parts of the National Landscape immediately south of the A264;
 - Although it is subject to some aircraft noise from the nearby Gatwick airport, the HA2 land benefits from dark skies and very low levels of light pollution, notwithstanding the proximity of Crawley and the airport;
 - Residential development would inevitably bring increased levels of noise, traffic, artificial lighting and human activity that would have a radical and adverse effect on the peace and tranquillity of this rural land.



7 Effect on landscape-related policy

Compatibility with national planning policy

- 7.1 The development of extensive areas of countryside at the scale proposed, whether the 3,000 scheme land (the HA2 allocation) or the 10,000 scheme land, is not compatible with NPPF para 174 (b) which requires planning policies and decisions to contribute to and enhance the natural and local environment and to recognise the intrinsic character and beauty of the countryside.
- 7.2 However, this alone would not be sufficient to reject the proposed allocation, since the same argument could apply to any large-scale housing development on any area of undeveloped countryside.
- 7.3 In this case however, the conflict with national policy is more significant. Firstly, the High Weald National Landscape (AONB) is a ‘valued landscape’ within the meaning of the NPPF, and development of the 10,000 scheme would have an adverse effect on its setting, contrary to paragraph 176. Housing development at the scale proposed in close proximity to the boundary of the National Landscape would have an adverse effect on its setting in three ways:
- Visual impact – there would be adverse effect on views;
 - Landscape impact – there would be an adverse impact on character;
 - Light pollution and loss of tranquillity – increased levels of artificial illumination, traffic, noise and human activity.
- 7.4 NPPF paragraph 185 includes a requirement to limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscape and nature conservation.
- 7.5 National planning policy guidance on light pollution [14] confirms that ‘light pollution’ or ‘obtrusive light’ ‘...can be a source of annoyance to people, harmful to wildlife and undermine enjoyment of the countryside or the night sky, especially in areas with intrinsically dark landscapes.’ The guidance defines intrinsically dark landscapes as those entirely or largely, uninterrupted by artificial light.
- 7.6 The night skies of the HA2 land and the 10,000 scheme land are predominantly similar in their levels of darkness to many parts of the High Weald National Landscape (AONB) and can accurately be described as being ‘largely uninterrupted by artificial light’. The protection of these areas of land from light pollution is therefore a matter that the NPPF requires to be addressed in planning decision-making.

Compatibility with adopted local plan policies

- 7.7 The adopted Horsham District Planning Framework (2015) [5] states (paragraph 3.10) that the rich heritage and high quality natural environment of the district is recognised and promoted and that in recognition of the key role that the environment and character of the district play in the local and wider economy that it is critical that the character of the district is conserved and enhanced (paragraph 3.26). The development of either the 3,000 scheme or the 10,000 scheme for housing would undermine these objectives.
- 7.8 The overall purpose of Policy 2 (Strategic Development) is ‘to maintain the district’s unique rural character whilst ensuring that the needs of the community are met through sustainable growth...’
- 7.9 Goal 1 is to focus development in and around the key settlement of Horsham, Goal 6 is to prevent the merging of settlements and to protect rural character and landscape; Goal 12 is to retain and enhance natural environmental resources including landscape and landscape character. The development of either the 3,000 scheme or the 10,000 scheme for housing would be directly contrary to the stated purpose of Policy 2 and to its Goals 1, 6 and 12.
- 7.10 Development of the 3,000 scheme or the 10,000 scheme land would be detrimental to landscape character, would fail to protect and conserve the key features and characteristics of the landscape, and in respect of the 10,000 scheme land would erode settlement separation, and would therefore be contrary to Policies 25 and 26.
- 7.11 Policy 27 specifically aims to prevent settlement coalescence, and sets out 4 tests that would need to be satisfied if development between settlements were to be deemed acceptable. If the 10,000 scheme land were to be developed for housing, none of the 4 tests would be satisfied, so the development would be unambiguously and directly contrary to adopted local plan policy.
- 7.12 Development of the 10,000 scheme land would be harmful to the setting of the High Weald AONB and would therefore be contrary to Policy 30 which requires the conservation and enhancement of statutorily protected landscapes and their setting.
- 7.13 Development of the 3,000 scheme land would be harmful to the setting of the Ifield Conservation Area and would therefore be contrary to Policy 34 which requires the retention and improvement of the setting of heritage assets.

Compatibility with proposed new local plan policies

- 7.14 Strategic Policy 3 (Settlement Expansion) of the Reg 19 draft Plan requires development to be ‘contained within an existing defensible boundary and the landscape and townscape features are maintained and enhanced.’ The proposed allocation would manifestly fail to do so.

7.15 Strategic Policy 11 (Environmental Protection) of the draft Plan requires development to minimise light pollution, and specifically to minimise the impact of lighting on neighbouring uses and on the wider landscape. Development of 3,000 new homes in a generally unspoilt rural landscape would inevitably result in additional light pollution and conflict with this policy. Development of the 10,000 scheme would do so to an even greater extent.

7.16 Strategic Policy 13 (Natural Environment and Landscape Character) of the draft Plan protects the natural environment and landscape character from inappropriate development and requires development to:

(2) Protect conserve and enhance landscape and townscape character... and ...maintains settlement separation.

Development of the proposed allocation land (the 3,000 scheme) would have an adverse impact on landscape character and would therefore conflict with this policy. Development of the 10,000 scheme would in addition fail to maintain settlement separation and would fail to meet the requirement of this policy to 'conserve and where possible enhance the setting' of the High Weald National Landscape (AONB).

7.17 Strategic Policy 14 (Countryside Protection) seeks to protect the rural character and undeveloped nature of the countryside from inappropriate development. It requires development to be appropriately integrated within the landscape and to be of a scale appropriate to its countryside character and location, and to avoid causing a significant increase in the overall level of activity in the countryside and to protect and/or conserve and/or enhance the key features and characteristics of the landscape character area in which it is located. Development of 3,000 homes on the proposed allocation land would directly conflict with this policy.

7.18 Strategic Policy 15 (Settlement Coalescence) protects landscapes from development which would result in the coalescence of settlements in order to protect local identity and a sense of place. It specifies the requirements to be met as:

- a) There is no significant reduction in openness and 'break' between settlements;
- b) It does not generate urbanising effects within the retained 'break' between settlements, including artificial lighting, development along and/or the widening of the roads between settlements; and increased traffic movements;
- c) Proposals respect the landscape and contribute to the enhancement of their countryside setting including, where appropriate, enhancements to the Green Infrastructure network, the Nature Recovery Network and/or provide opportunities for quiet informal countryside recreation.

7.19 Although residential development on the proposed HA2 allocation land would not directly result in coalescence of settlements to a significant degree, it is highly likely that it would do so indirectly, in that the development of the 10,000

scheme would fail on each of these tests, would fail to protect local identity and would seriously erode sense of place, so would be in direct conflict with this policy.

- 7.20 Given the obvious and strong linkage between the 3,000 scheme and the wider 10,000 scheme, any decision on the proposed HA2 allocation would necessarily need to take into account the likelihood and consequences of further subsequent expansion of residential development.
- 7.21 Strategic Policy 16 (Protected Landscapes) requires the natural beauty of the High Weald AONB (National Landscape) to be conserved and enhanced, and that there will be no adverse impacts on the natural beauty of the protected landscape. It requires proposals to have regard to the relevant landscape management plan (in this instance the High Weald AONB Management Plan 2019-2024, 4th Edition [6]), to demonstrate how the key landscape features or components of natural beauty and the setting of the protected landscape will be conserved and enhanced, and to have appropriate regard to 'dark skies', maintaining local distinctiveness, sense of place and the setting of the protected landscape and if necessary providing mitigation or compensation measures. Whilst the development of the 3,000 scheme would be unlikely to have any significant effect on the National Landscape, the development of the 10,000 scheme would undoubtedly have serious adverse effects on the National Landscape and its setting and compromise dark skies, local distinctiveness and sense of place.

Compatibility with the Neighbourhood Plan

- 7.22 The Rusper Neighbourhood Plan 2018-2031 [7] which was made on 24 June 2021 forms part of the statutory development plan for the parish of Rusper.
- 7.23 In relation to housing development, the Neighbourhood Plan follows the 2018 HDC SHELLA map [8] and takes the position that there are no additional sites suitable for large scale housing in the parish beyond those areas for which planning permission has already been given. Development of the 3,000 scheme (the HA2 allocation) or the 10,000 scheme for large-scale housing would be directly contrary to the Neighbourhood Plan.
- 7.24 Neighbourhood Plan Policy RUS10 (Dark Skies) requires all new development to be designed to minimise light pollution and stipulates that all new proposals must demonstrate how light pollution will be prevented. Residential development at the scale proposed, whether for 3,000 or 10,000 homes, would inevitably result in a significant increase in artificial lighting and in light pollution, and would be incompatible with this policy.

Compatibility with the High Weald AONB Management Plan

- 7.25 The local planning authority has a statutory duty to have regard to the purpose of conserving and enhancing the natural beauty of National Landscapes (AONBs) in making decisions that affect the designated area. In accordance with NPPF para 176 this includes the setting of AONBs as well as development within their boundaries.
- 7.26 Among the key characteristics of the High Weald National Landscape identified in its Management Plan [6] under the heading ‘Other perceived qualities’ (page 59) are:
- *Scenic beauty and glimpsed long views*
 - *Unspoilt rural landscape with a sense of naturalness unusual in South East England*
 - *Intrinsically dark skies landscapes with a sense of remoteness and tranquillity*
 - *Human-scale landscape with a sense of intimacy.*
- 7.27 Development of large-scale housing on the 10,000 scheme land extends well within the setting of the National Landscape and would be damaging to each of these four key characteristics. This would cause serious harm to the setting of the National Landscape in this area and would be incompatible with Objective OQ4 of the Management Plan that seeks to protect and promote the perceptual qualities that people value. The scenic qualities of the 10,000 scheme land which forms part of the setting of this protected landscape are clearly recognised by the Council: its recommended Horsham-Rusper circular cycling route, published on the Council website [15], refers in glowing terms to the ‘beautiful countryside’ and ‘superb views across the Low Weald’.

8 Conclusions

- 8.1 The proposed HA2 allocation for 3,000 homes cannot be considered in isolation from the stated aspiration of the site promoter to deliver 10,000 homes. To seek to do so as the Reg 19 draft Local Plan does is illogical and incompatible with the principles of good planning.
- 8.2 The development of 3,000 homes as proposed in the draft Local Plan on a rural site of acknowledged landscape sensitivity would inevitably result in adverse landscape and visual effects, which in my view would include many that would be significant in EIA terms. Insufficient evidence has been provided to demonstrate that these adverse effects could be reduced to an acceptable level through embedded or secondary mitigation measures.
- 8.3 There is a serious deficit in the level of environmental information available and a lack of clarity over the proposed development including a seriously inadequate masterplan. The extent of these deficiencies is particularly apparent in the context of the stated aspirations to deliver a 'garden town' and a 'landscape-led' development.
- 8.4 The EIA scoping report gives rise to serious cause for concern over the approach that Homes England proposes to adopt in relation to landscape and visual impact assessment.
- 8.5 There are significant deficiencies in the Council's sustainability appraisal in relation to the proposed allocation, most notably the attempt to divorce the proposed allocation for 3,000 homes from the linked aspiration by the same promoter for 10,000 homes.
- 8.6 It is inevitable that the proposed development would result in a loss of tranquillity. In my view the increase in light pollution from residential development of 3,000 homes in this location would be likely to be considerable, and that of the development of 10,000 homes would be correspondingly greater.
- 8.7 Were development of 10,000 homes to occur, this would result in a coalescence of settlements contrary to current and proposed local plan policy. The likelihood of initial development of 3,000 homes leading to ultimate development of 10,000 homes is substantial.
- 8.8 The proposed HA2 allocation would conflict with national and local planning policy and guidance for the reasons set out in my report.
- 8.9 The need for mitigation to address adverse landscape and visual impacts is acknowledged in the EIA scoping report but inadequate information has been provided to establish the nature of the proposed mitigation measures and how effective they might be.

- 8.10 There is no evidence that landscape and visual impacts have been adequately considered in the current development proposal or that the key ‘garden settlement’ principle of enhancing the natural environment would be met.
- 8.11 The draft Local Plan fails the test of soundness in respect of proposed allocation HA2 West of Ifield because:
- (3) Appropriate and proportionate evidence on the landscape implications of the proposed development has not been provided; and
 - (4) Given the strong likelihood that the proposed allocation would be the first step towards the development of circa 10,000 homes across a wider area that would adversely affect the High Weald National Landscape (AONB) and its setting, it does not comply with the requirements of paragraphs 174 and 176 of the NPPF.

Neil Williamson BA (Hons), MA, FLI, PPLI, FCMI
Director
Neil Williamson Associates

February 2024

Annex 1

References

[1]	Horsham District Reg 19 draft Local Plan, 2023 Local Plan Regulation 19 Horsham District Council
[2]	Horsham District planning policy evidence base (local plan review) including Sustainability Appraisal and Landscape Capacity studies https://www.horsham.gov.uk/planning/planning-policy/evidence-base
[3]	Locally-led Garden Villages, Towns and Cities, DCLG, 2016 https://www.gov.uk/government/publications/locally-led-garden-villages-towns-and-cities
[4]	Homes England EIA Scoping Report and covering letter ref EIA/23/0007 https://iawpa.horsham.gov.uk/PublicAccess_LIVE/SearchResult/RunThirdPartySearch?FileSystemId=DH&FOLDER1_REF=EIA/23/0007
[5]	Horsham District Planning Framework (adopted Local Plan), 2015 https://www.horsham.gov.uk/planning/local-plan/read-the-current-local-plan
[6]	High Weald AONB Management Plan 4 th Edition 2019-2024 https://highweald.org/aonb-management-plan/
[7]	Rusper Neighbourhood Plan, 2021 https://rusper-pc.org.uk/neighbourhood-plan/ https://www.horsham.gov.uk/planning/neighbourhood-planning/rusper
[8]	Rusper Housing Assessment and map, SHELAA 2018 https://www.horsham.gov.uk/planning/planning-policy/strategic-housing-and-economic-land-availability-assessment-shelaa/housing-land-availability
[9]	Guidelines for Landscape and Visual Impact Assessment, 3 rd Edition, 2013, Landscape Institute & IEMA (GLVIA3)
[10]	National Character Area Profile: 121 Low Weald, Natural England, 2013 https://publications.naturalengland.org.uk/publication/12332031?category=587130
[11]	Horsham District Landscape Character Assessment (and LCA map), 2003 https://www.horsham.gov.uk/planning/planning-policy/evidence-base/landscape-character-assessment
[12]	England's Light Pollution and Dark Skies map, CPRE (Natural England, 2016) https://www.nightblight.cpre.org.uk/maps/
[13]	The dark side of light: how artificial lighting is harming the natural world, NATURE, Jan 2018 https://www.nature.com/articles/d41586-018-00665-7
[14]	National Planning Policy Guidance: light pollution https://www.gov.uk/guidance/light-pollution

[15]	Horsham-Charlwood-Rusper-Warnham leisure cycling route (Route 26) https://www.horsham.gov.uk/sport-and-leisure/cycling
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Annex 2

Summary of qualifications and experience

Neil Williamson is a Chartered Landscape Architect, an Urban Designer, and a Fellow and Past President of the Landscape Institute, with more than 35 years' experience in landscape planning including appeals and Public Inquiry work. He is an independent consultant offering environment, design and management services, a Design Council Expert – Associate and a member of various Design Review panels including at the Design Commission for Wales and Design West. Prior to setting up his own consultancy business he was Head of Environmental Design at New Forest District Council, responsible for environmental project delivery and professional advisory services in landscape architecture, urban design, architecture, building conservation and arboriculture. He regularly provides design and landscape advice to Bath & North East Somerset Council on the implications of development proposals within the City of Bath double World Heritage Site and its setting, and within or affecting the setting the Cotswolds and Mendips National Landscapes (AONBs).

Experience in landscape planning and development management includes:

- Critical appraisal of planning submissions and EIAs
- Formal and informal Design Review
- Assessment of proposals in the light of national policy and local policy for design and the environment
- Analysis of Landscape and Visual Impact
- Environment and design negotiation
- Advice and recommendations to support planning decisions
- Expert witness and contributing to the local planning authority response to major infrastructure proposals (e.g., Navitus Bay proposed offshore wind farm; Dibden Bay proposed container port)
- Provision of environmental design policy advice for successive versions of the Local Plan in New Forest District over the period 1991–2015
- Project leader for New Forest District Landscape Character Assessment, adopted as Supplementary Planning Guidance in 2000

Experience in Public Inquiry/ Public Examination includes:

- Navitus Bay (proposed Offshore Wind Farm) Public Examination, 2014 (decision 2015)
 - Analysis of landscape and visual impacts, responses to Environmental Statements, Local Impact Report, negotiation of financial and environmental offsetting measures, co-ordination with other Hampshire, Dorset and Isle of Wight planning authorities
- Dibden Bay (proposed Container Port) Public Inquiry, 2001–2002 (decision 2004)
 - Expert Witness on behalf of New Forest District Council and Hampshire County Council for landscape, visual and community impacts
 - Appointment, supervision and co-ordination of specialist consultants (e.g. lighting, visualisation techniques)
 - Support to and liaison with local community groups and other organisations with similar environmental concerns, including National Trust, New Forest Committee, Council for National Parks and CPRE
- Local Plan Inquiries and Examinations, 1993–2012
 - Expert Witness and supporting evidence
- s78 Appeals by Public Inquiry, various, 1991–2017, Expert witness

For further details of background and experience please see website:

<https://www.neilwilliamsonassociates.com/>