

Rother Valley Railway

Proposed reinstatement of former Kent and East Sussex Railway track (section between Northbridge Street and Junction Road)

Response to Representation: Landscape and Visual Matters

prepared by

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for

Temple Group Ltd on behalf of Rother Valley Railway Ltd

July 2021

- 1.1 In June 2021 I was asked to respond to a representation made to the forthcoming public inquiry into the proposed reinstatement of the former Kent and East Sussex Railway track (section between Northbridge Street and Junction Road).
- 1.2 The representation, dated 27th June 2021, was made by local resident and chartered landscape architect David Webster CMLI, and it set out his concerns about the landscape and visual effects that could potentially arise from the scheme.
- 1.3 The background to my involvement to the scheme is set out in reports I was asked to produce by Temple Group Ltd on behalf of Rother Valley Railway Ltd, dated April 2020 and May 2021 (the latter being an update to the former), and which have been submitted to the inquiry (they are also referred to in Mr Webster's representation).
- 1.4 In summary, I am an independent landscape practitioner specialising in landscape planning. The aim of the original commission was to determine a) whether the findings of the applicant's Landscape and Visual Impact Assessments (LVIAs) carried out between 2013 and 2017 could be relied on for decision-making purposes, and b) whether any matters arising since 2017 required further study.
- 1.5 Regarding b), I did consider that further studies were required, so I carried out the necessary assessments and reported the findings.
- 1.6 In summary, I concluded that, although there were certain flaws in the LVIAs' methods and processes, the overall conclusion that the proposed development would not give rise to significant adverse effects on landscape character or visual amenity was appropriate.
- 1.7 Mr Webster's main concerns and my responses to them are as follows:

i. Concerns relating to LVIA:

*... the reliability of the submitted LVIA (Section 8 – **RVR/25**) which I consider to have a number of shortcomings and therefore should not have been relied upon for decision making purposes.*

Response: I agree that the LVIA has shortcomings - the relevant matters are covered in depth in my April 2020 review; however, following my own assessments, I concluded that, overall, the judgements made about levels of effects and whether or not they were significant could be relied on for decision-making purposes.

ii. Concerns relating to landscape effects:

- a) *The landscape value of the Rother Valley as part of the High Weald AONB would more appropriately be considered **Very High** – I believe the LVIA underscores as **High** (as does Ms. Tinkler (Paragraph 5.5.43(i) of **RVR70-02**).*

Response: As noted in my April 2020 review, the LVIA did not provide criteria for, nor did it state, levels of value and susceptibility to change. It did, however, provide criteria for, and state, levels of sensitivity. In fact, in my opinion, the LVIA's sensitivity criteria (see LVIA Table 8.1) are the criteria which would have been used to establish levels of value, since they include factors which contribute to value.

It is up to the assessor to set what they consider to be the appropriate criteria for an LVIA. In my own criteria for landscape value, AONBs are in the Very High value category because they are nationally-designated. The LVIA's criteria for Very High value refer to 'internationally important landscape features', and those for High value refer to 'nationally important landscape features', hence the AONB being categorised as High value. Given that the criterion is clearly explained (i.e. nationally important), the value is not understated.

There would be significantly [sic] adverse landscape effects in these Sections [Sections 3 and 5 of route]... landscape effects would likely be greater than stated in the LVIA... the residual landscape effects will also be greater than stated...

Response: The reasoned justification for my opinion that the proposed development would not give rise to significant adverse landscape effects is set out in Section 5.5 of my April 2020 review. I also concluded that the scheme could potentially deliver small landscape benefits.

Mr Webster's concerns relate to the proposed embanked section of reinstated railway between the A21 at Northbridge Street, and Salehurst Halt, and effects arising from *'the introduction of a railway embankment in a flat floodplain'*. In email correspondence with me he said that *'this is a flood plain and the original railway would have been at grade'*.

Mr Webster's assumption that the original railway would have been at grade appears to be incorrect: ES Figures 2.5a - 2.5e are a series of 1930s maps which show the line in some detail, including the original railway embankments, presumably precisely because of the location within the flood plain. Indeed, the embankments in the section between Northbridge Street and Salehurst Halt, which is the section Mr Webster is referring to, appear to have been higher / wider than those between Salehurst Halt and Junction Road.

In addition, as stated in my reports, the local landscapes are characterised by both railway and flood embankments - the A21 itself is embanked. Paras. 5.4.37 - 38 of my April 2020 review noted as follows:

'... one of the Lower Rother Valley's key characteristics is 'Engineered raised grass flood banks along the main river and straightened rivers channels which detract from the naturalness of the river valley'. The East Sussex County Landscape Assessment (ESCLA) notes that 'river and larger channels [are] hidden behind raised grassy flood-banks'.

'There are also embankments associated with the K&ESR corridor, which runs through the north-western sector of the County Landscape Character Area (CLCA). Within the study area, the LVIA notes: 'As the site is located in the floodplain of the River Rother, flood events are commonplace and recent flood defence measures are a clearly evident part of the landscape character at the Robertsbridge end of the route'.

- b) *I disagree with Ms. Tinkler's conclusion at Paragraph 5.5.43(xi) that there is "a relatively high degree of consensus that the heritage steam railway is recognised for the positive contribution it makes / can potentially make to landscape character and visual amenity (and related areas such as social / cultural / economic sustainable travel / tourism, green infrastructure and natural capital)".*

Response: My para. 5.5.43 (xi) goes on to explain the reasons for this conclusion (given here for ease of reference):

- a) *'The Kent and East Sussex Steam Railway [which] runs from Bodiam to Tenterden in Kent' is one of CLCA 13's stated 'Key positive Landscape Attributes'.*
- b) *The ESCLA states, 'With appropriate planning control **the High Weald may have the ability to absorb more informal green recreation and tourism.** This is becoming increasingly important to the local economy'.*
- c) *The 2019-24 High Weald AONB Management Plan notes that **the '89km of historic railway line' within the AONB contributes to the area's 'Natural and cultural capital'.***

- d) The LVIA notes and factors in '**the potential beneficial effects due to the historic value of the restored railway**'.
- e) The 2017 ES addendum identifies scheme benefits in terms of **the positive contribution made by the reinstatement of the railway to AONB Management Plan's objective of maintaining the historic pattern and features of the network of routeways** [this relates to Management Plan Objective R1].

iii. Concerns relating to visual effects:

- a) *Grave reservations about the methodology employed by the LVIA to consider visual effects.*

Response: Although I agree that the LVIA's methods were not entirely satisfactory, having carried out my own assessments I concluded that the LVIA did provide a comprehensive assessment of effects on views and visual amenity, which could be relied upon for decision-making purposes.

- b) *There is the potential for the scheme to give rise to significant negative visual effects, particular [sic] towards the western-end of the reinstatement route. I do not believe that these effects can be appropriately mitigated.*

Response: The reasoned justification for my opinion that the proposed development would not give rise to significant adverse visual effects is set out in Section 5.6 of my April 2020 review (see also May 2021 Update following site visit). I also concluded that the scheme could potentially deliver small visual benefits.

Mr Webster appears to agree with my conclusion that the majority of adverse visual (and sensory) effects would be caused by the trains themselves as they moved through the open countryside. At certain locations and for certain receptors, levels of visual effects could be relatively high, although in my opinion they would not be significant.

The levels would depend on factors such as a) the distance of the receptor from the train (broadly, levels would decrease with distance); b) the nature of the receptor (e.g. people in residential properties, public footpath users); c) the frequency, duration and times of day / night at which the effects occurred (see footnote to para. 5.4.8 (b) of my April 2020 review); and d) subjectivity (Mr Webster accepts '*that there is always a degree of subjectivity in these matters*': whilst some people may find the scheme intrusive, others may enjoy watching and listening to steam trains moving through the landscape).

- c) *Many of RVR's train operations feature a diesel train that emits a tall column of black exhaust. Overall, I do not believe that the adverse visual effects of the train operations have been properly assessed.*

Response: My assessment did consider the effects of black diesel smoke - I have first-hand experience of this as heritage railway diesel (and steam) trains occasionally run along the main-line railway which is c. 50m from my house. In my opinion, the visual effects of black smoke are no different from the effects of white smoke.

- 1.8 I stand by the findings of my previous assessments which are set out in the April 2020 review and May 2021 update reports, and which should be referred to for further information about these matters.

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