

Representation by David Webster CMLI

Landscape & Visual Impact Concerns

(in relation Track Reinstatement between Northbridge Street and Junction Road)

Dear Sir,

Firstly my apologies for the late arrival of my input on this matter. For the record, I am a local resident of Salehurst and an objector to the proposed track reinstatement. I am also a chartered landscape architect with experience of both reviewing and authoring LVIA's.

Background

My concerns relate to 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. In particular, I was concerned that there was no clear assessment of the landscape effects, with the clear emphasis of the LVIA being on visual effects. This was an important shortcoming, as saved Local Plan Policy EM8 only supports the track extension so long as *“it has an acceptable impact on the High Weald Area of Outstanding Natural Beauty”*. It is important to note that the AONB Unit raised concerns regarding the LVIA – see Claire Tester's letter dated 6th June 2016 (Page 21 of 34 – **RVR/64**). These concerns were not addressed until the 2017 ES Addendum (**RVR/28**). However, it remains the case that no clear and reliable assessment of landscape effects (following GLIVA3 methodology) was made in support of the original planning application or TWAO scoping process. I also have concerns about the methodology employed with regard to the assessment of visual effects.

Concerns relating to Landscape Effects

I welcome the LVIA review undertaken by Ms. Tinkler (**RVR70-02**) which clearly identifies the shortcomings of the original LVIA throughout (in particular Section 5.5). I understand that **RVR70-02** ultimately agrees with the LVIA conclusions, but would draw the Inspectors attention to the following concerns:

- 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**);
- At many locations along the proposed reinstatement route there are few if any references to the type of development proposed - in particular, Section 3 and Section 5 (see Figure 8.5 – **RVR/27**). In these areas the landscape susceptibility is arguably higher and therefore increases the landscape sensitivity. Using the methodology employed in **RVR70-02** the susceptibility ranking for these areas would more correctly be judged to be **Moderate** and the overall Landscape sensitivity should be recorded as **High** (see **RVR70-02** Tables 3 & 4). On this basis, even **Small** magnitudes of change would result in a **Moderate** significance of effect. I consider that the likely magnitude of effect in both Sections 3 & 5 would be **Moderate** (to reflect the introduction of a railway embankment in a flat floodplain), resulting in **Moderate to Major** overall significance of effect. I therefore disagree with Ms. Tinkler's conclusions and suggest that there would be significantly adverse landscape effects in these Sections (Paragraph 5.5.45 of **RVR70-02**).
- As Ms. Tinkler notes at Paragraph 2.13 following her site visit (**RVR-W5-2**) – *“During the site visit I noticed that the far eastern end of the site corridor had recently been roughly surfaced*

with stone. That has resulted in some damage to and loss of trees, and the resultant gaps allow views in from nearby residential properties, roads, commercial premises, and a campsite. This was not anticipated in the effects assessments (NB it adversely affects character as well as visual amenity)". It is clear that this will be the case along the reinstatement route and that the landscape effects would likely be greater than stated in the LVIA.

- As Ms. Tinkler notes at Paragraph 2.16 of **RVR-W5-2** the final scheme would need to be subject to good landscape design and proper future management. However, as she notes at Paragraph 2.12 it unlikely that the railway operator would attempt to fully restore the existing vegetated corridor along the reinstatement route as they would be *"unlikely to want the whole of the section to be through a deeply-wooded corridor, missing out on fine views of the surrounding countryside"*. For that reason I think that the residual landscape effects will also be greater than stated.
- 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)"*. Surely the number of objections to the reinstatement and the requirement for this Inquiry refute this observation.

Concerns relating to Visual Effects

I have grave reservations about the methodology employed by the LVIA to consider visual effects. For example, where a receptor is able to have a **Medium** sensitivity and the magnitude of impact is assessed as **Moderate**, the overall significance of effect is considered to be **Slight** (i.e. Assessment Viewpoint A – page 36 of 58 in **RVR/27**). This is implausible.

Using Ms. Tinkler's methodology the overall level of effect would be **Moderate** (and therefore Significant) – Table 12 (**RVR70-02**). This ranking is supported by some of the commentary in Figure 8.6. For example, the post-completion view from Church Lane is described:

"Reinstated low embankment and track bed forms a somewhat alien, engineered feature in otherwise rural landscape with fencing running along the base of the embankment. There may be views of bridges 14, 16 and the farm access crossing with signalling equipment if required. Depending upon the detailed design for the halt, there may be views of tree clearance and of the Salehurst Halt construction and signalling equipment" – Assessment Viewpoint F (Page 41 of 58 in **RVR/27**).

On this basis, I agree with Ms. Tinkler's initial conclusion (Paragraph 6.8(iii) of **RVR70-02**) that there is the potential for the scheme to give rise to significant negative visual effects, particular towards the western-end of the reinstatement route. I do not believe that these effects can be appropriately mitigated and agree with Ms. Tinkler's observation at Paragraph 2.11 of **RVR-W5-2** – *"I do not recommend relying on existing or proposed vegetation to mitigate adverse effects on views"*.

Whilst I clearly disagree with Ms. Tinkler's conclusion at Paragraph 2.6 of **RVR-W5-2**, I believe that she is correct to identify that the trains themselves could cause significantly adverse visual effects (Paragraph 2.7), but accept that there is always a degree of subjectivity in these matters.

It is also important to note that whilst the covers to the various Environmental Statements and Addendums include an image of a small steam engine, 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.

Summary

In conclusion, I believe that the reinstatement of the track and subsequent train operations have the potential to cause significant and adverse landscape and visual effects that have not been identified in the Environmental Statement (or subsequent addendums).

Whilst I agree with much of Ms Tinkler's LVIA review, I believe that she understates the likely landscape effects (in particular at Sections 3 & 5) and the visual effects in various locations. There will undoubtedly be significantly adverse visual effects created in an area with a number of public rights of way and open views from publicly accessible locations.

In addition a large number of residential receptors will have either clear views or partially screened views of the proposal.