

Lea Castle Quarry Inquiry

Appellant response to Rule 6 Party comments on Viewpoint 8 - Photomontage Year 25 from public bridleway 625(B)

The photomontage indicates a view that is not dissimilar to the current situation, in terms of landscape elements visible. The most noticeable change is the new woodland. In terms of landform the levels beyond the extraction limit are retained and the slopes are gentle, as also indicated on the restoration sections (CD 3.18) and Concept Restoration Plan (CD 15.23).

This particular viewpoint (maybe more so than any other viewpoint) demonstrates that the restoration scheme will be recreating parkland character. The difference between the existing and proposed is plainly evident: the pasture, woodland, tree clumps are all demonstrably parkland features. The existing situation (as can be seen in this viewpoint) possesses no such features. As per Mr Sutton's evidence, offered during cross-examination, the specific landform in this part of the Appeal Site ("the dome"), as can be seen at this viewpoint, has no particular 'parkland' characteristic and is of no intrinsic heritage significance in its own right.

Mr Partridge does not have any academic landscape qualifications, which in itself does not prevent him from commenting on landscape matters, however his response contains a wholly inaccurate analysis, that is contrary to the evidence presented in the Viewpoint 8 photomontage and other evidence (cross sections and restoration plan) that was submitted to the Inquiry. These inaccuracies are set out below.

1. Mr Partridge claims that the landform demonstrates a 'jarring contrast' to the existing landform. Appellant response: This is incorrect and appears to simply borrow Inspector Woolcock's language used in the Ware Park decision.
2. Mr Partridge claims the photomontage shows a 'steep lip or slope on the edge of a bowl'. Appellant response: the photomontage (and restoration plan and restoration sections) do not illustrate this landform noting the slope at the edge of the extraction limit is no steeper than existing landform profiles on the site and surrounding area.
3. Mr Partridge claims the photomontage shows 'small mounds or moguls'. Appellant response: the photomontage (and restoration plan and restoration sections) do not illustrate this type of landform. A Mogul is defined in the Cambridge online dictionary as:

'a small pile of hard snow on the side of a hill or mountain used for skiing, created to add interest and difficulty to the sport'

Whilst the Appellant considers that the recreation value of the restored site would be notably improved, relative to the baseline, this would be achieved from

the introduction of pocket parks, parkland planting and an extended rights of way network. For the avoidance of doubt, there is no proposal on the Appeal Site for the creation of an artificial landform for skiing.

4. Mr Partridge claims the new planting blocks long distance views. Appellant response: this is inaccurate as the proposed woodland at Broom Covert sits below the horizon. The existing new woodland on the site to the left of the Broom Covert planting extends slightly on the horizon, close to where other tree planting is already seen on the skyline and consequently has a negligible effect on wider views.

Finally, there is an inaccurate recording by Mr Partridge of what Mr Furber said in EiC i.e. *'no documents say the landform is important'*. The point made by Mr Furber were that no documents identify the particular landform within the site as being of important to the extent that all landform should be retained as existing. Mr Furber went on to say that the landform on the Site is characteristic of the rolling landform of the area and that the restoration would, in any event, result in a rolling landform, that whilst not identical to the existing situation would not be incongruous or uncharacteristic. This is also demonstrated on the restoration photomontage (Year 25) from Viewpoint C (Figure/Page 56 rPoE2.08) that Mr Furber identified in EiC.