



PROOF OF EVIDENCE

ANDREW MINDHAM

LANDSCAPE ARCHITECT

**CITY OF BRADFORD METROPOLITAN DISTRICT
COUNCIL**

**TOWN AND COUNTRY PLANNING ACT 1990
SECTION 78 APPEAL**

Horn Crag Quarry, Fishbeck Lane, Silsden

Appeal by Andrew Calvert

Ref: APP/W4705/W/23/3332884

1.0 Witness Background and Particulars

1.1 I am Andrew Mindham (CMLI), a qualified Landscape Architect and have been a member of the Landscape Institute since 2005. I hold a Bachelor of Science degree in Geography from University College London (1998) and a Masters in Landscape Architecture from Edinburgh College of Art (2001).

1.2 I have a total of 22 years experience as a Landscape Architect and have been employed by the City of Bradford Metropolitan District Council since July 2018 as Gateway Officer. I have previously worked at Stockton Borough Council, several Groundwork Trusts and had a short time at RPS. At both RPS and Groundwork I was involved in the preparation of Landscape and visual impact assessments, and landscape appraisals. At Stockton I worked on a range of projects but was the key consultee on planning application where landscape and visual matters were a factor.

1.3 My current role is at the Senior Landscape Architect level and involves a range of duties including commenting on planning applications and consulting with the spatial planning team on policy.

1.4 I worked with a colleague (Roger Scales) in the Landscape Design and Conservation Team to assess the application and prepare landscape comments. This included a site visit undertaken in April 2022. I am familiar with the appeal site and the wider district having worked in the area for over five years.

1.5 The evidence I have prepared and provide for this Inquiry and in this Proof of Evidence are my true and professional opinions.

2.0 Introduction and Scope of Evidence

2.1 In presenting my evidence I will work through the appellants landscape and Visual appraisal (LVA) and identify key areas of agreement and disagreement. I will also set out key areas where our assessment of the visual impact differs from of the LVA. In all cases the methodology used will follow that in the GVLIA3. I will also address points raised in the appellants statement of case.

2.2 The planning application was submitted to The City of Bradford Metropolitan District Council by Andrew Calvert and validated on the 7th March 2023. The application was refused by committee on the 24th May with 4 reasons for refusal. This landscape proof of evidence addresses the Council's second Reason for Refusal which states:

'The proposal as submitted is unacceptable, as it will not make a positive contribution towards the conservation, management and enhancement of the diversity of landscapes within the designated landscape character area of the Rombalds Ridge Landscape

Character Area. The change is not considered acceptable, as it will have adverse landscape and visual effects, particularly in relation to; the loss of an area of distinct character and a local landmark within the broader character area; the significant impact on recreational use due to the visual impact of the quarry works; the length of disruption and disturbance locally and on the broader enjoyment of the surrounding Landscape over a minimum of 20 years with potentially an additional 15 years to achieve some maturity in the restored scheme; the adverse visual impacts on amenity for residential properties; the adverse impacts on tourism; and the adverse impacts on recreation.

2.3 As such, the proposal is contrary to policies EN4, DS2, DS5, EN1 EC4 (F) and EN9 (3) of the Bradford Core Strategy, the Landscape Character Assessment SPD for Rombalds Ridge and SWES5 and SWES6 of The Steeton with Eastburn and Silsden Neighbourhood Development Plan.'

2.4 There are three other Reasons for Refusal set out in the Decision Notice as numbers 1,3 and 4. These relate to groundwater and ecology. I do not intend to address these in my proof of evidence.

3.0 Documents

3.1 In preparing my evidence I have reviewed the following documents to inform my professional judgements.

- CBMDC LANDSCAPE CHARACTER SPD 1.10.2008.VOLUME 4 – ROMBALDS RIDGE.
- Committee Report
- Landscape Institute & IEMA (2013), 3rd Edition Guidelines on Landscape and Visual Impact Assessment
- Technical Guidance Note 1/20 (10 Jan 2020) Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs).
- Landscape Institute – Assessing landscape value outside national designations. Technical Guidance Note 02/21.
- Consultation Responses regarding the application.
- The Appellant's Landscape and Visual Assessment

4.0 Relevant Policy

4.1 The proposal is contrary to policies EN4, DS2, DS5, EN1 EC4 (F) and EN9 (3) of the Bradford Core Strategy, the Landscape Character Assessment SPD for Rombalds

Ridge and SWES5 and SWES6 of The Steeton with Eastburn and Silsden Neighbourhood Development Plan.’

5.0 Description of the Proposal and Site

5.1 The proposed development of approximately 5.9ha of the application site, including the short access track off Fishbeck Lane, is for the extraction of the remaining high-quality, dimensional sandstone. It is understood that the extraction would be progressive over a period of 20 years with 6 phases of extraction. Any materials not removed from site would be used to restore the landscape in phases.

5.2 The restoration proposals will reduce the profile of the site by about 10-15m, at its highest point, effectively removing a significant distinctive feature of Horn Crag. This together with removal of moorland vegetation would fundamentally alter the character of the area Reference the Application Drawings Topographical Survey E454-001 and 003 dated 30.08.2019, Cross – Sections E454-006 dated 17.11.23 and Restoration Contours Design E454-005 dated 17.11.21.

5.3 Whilst there would be a phased restoration the volume of stone removed would alter the profile of a hillside lowering its height to create a permanent change in the character and appearance of the site. The removal of mature moorland vegetation, which is key to its appearance and character would also create a long term change in the character and appearance of the site.

6.0 Landscape Sensitivity and Condition

6.1 According to the CBMDC Landscape Character Assessment (LCA) SPD, adopted 1.10.2008, the site lies on the western edge of the Rombalds Ridge Landscape Character Area in a landscape character type designated as Upland Pasture. The combination of a strong strength of character, high historic continuity and prominent and open level of visual exposure results in the landscape being **very sensitive to change**.

6.2 The general conclusion of the Landscape Character Assessment SPD in relation to ‘Upland Pasture’ are that the Landscape Type has high sensitivity to change and high Landscape value. I agree with this this unequivocal statement and supporting methodology clearly outlines why this landscape is both sensitive to change and of high landscape value. This contradicts item 5.1 in the Appellants Statement of Case that the landscape is not ‘valued’. This document gives clear policy guidance as to what is require to retain the character and integrity of the landscape. The following shows an extract from the LCA:

LANDSCAPE STRATEGY

8.2.1 Analysis

- **Strength of Character: Strong**

A uniform simplicity of the gently rolling landform managed pastures and stonewall boundaries give this landscape type a strong character.

- **Condition: Good**

The improved pasture grasslands are in good condition with traditional sheep and cattle grazing predominating. Stone boundary walls are in good repair.

Condition	Good	STRENGTHEN	Strengthen and Conserve	CONSERVE
	Declining	Strengthen and Enhance	Conserve and Enhance	Conserve and Restore
	Poor	CREATION	Restore and Enhance	RESTORE
		Weak	Moderate	Strong
	Character			

Policy Guidelines: Conserve

- *Conserve the simple patchwork of field systems bounded by stone boundary walls. Restore hedges as boundaries where applicable.*
- *Large scale tree planting is not appropriate to the character of the area, although small mixed shelter belts around farmsteads would be acceptable.*
- *Encourage the traditional management of grasslands as hay meadows to improve the biodiversity of the area.*

6.3 This assessment emphasises the integrity of the existing landscape, its sensitivity and the need to conserve it.

Policy Guidelines

- *With a strong character, high historic continuity, open character and a prominent position in the countryside, this landscape can be considered to be very sensitive to development.*
- *The character of the upland pastures is based upon the single traditional farmstead and any change to this pattern would weaken its strength.*
- *Large ‘specimen’ size sycamores are often associated with isolated farm buildings and are an important landscape component. Thinning of smaller selfset groups with the replanting of oaks would be appropriate.*
- *Small-scale expansion of farm units should be related to proven agricultural need. Large modern buildings and silos should be discouraged where possible or mitigated with local small scale tree planting.*
- *Major changes to the traditional road network of narrow lanes and dry stonewalls would significantly weaken the character.*

6.4 The policy clearly states that the sensitive nature of the landscape makes minor changes in the landscape unacceptable in policy terms. This assessment is especially applicable to the site in question as it is particularly prominent and acts as a local landmark. Furthermore it is in close proximity to sensitive receptors such as Public Rights of Way (Silsden 17,18,19) and Settlements (Cringles Caravan Park). This is outlined in the appellants LVA as the extract below summarises:

Landscape Receptor – CROW)

‘The sensitivity of the CROW/Registered Common Land to change from certain types of development is considered to be high, as there is a strong and recognisable structure and landscape is in good condition, with a mosaic of upland heathland habitats. This is a visually distinctive landscape, which accords with local landscape character and has a strong sense of place. This is a highly valued landscape for recreation, scenic beauty and a sense of tranquillity, even though it is located close to a number of settlements and urban areas.’

6.5 I generally concur with the findings of the LVA in terms of landscape sensitivity, the value of the landscape and baseline conditions.

7.0 Area of Disagreement-Landscape Value

7.1 The Appellants Statement of Case states under item 5.1 (second occurrence) that the landscape is not valued’ as evidenced by a lack of a national or local landscape designation. However this lack of designation does not mean the landscape does not have value. The LCA

SPD, adopted 1.10.2008, describes this area as Upland Pasture within the Rombalds Ridge Character Area, states the area is **very sensitive** to change due its strong character, high historic continuity and displaying a safe feeling of remoteness. This clearly demonstrates the quality and sensitivity of the landscape type.

7.2 The **authority does not designate areas for high landscape value**. As such the lack of local designation is irrelevant in this instance. This issue is highlighted in reference document 5 (Guide to Landscape and Visual Impact Assessment 3) as follows:

'GLVIA3 recognises that landscape value is not always signified by designation: 'the fact that an area of landscape is not designated either nationally or locally does not mean that it does not have any value' (paragraph 5.26). '

7.3 In addition the scale of the landscape in question is too small to warrant a national landscape designation but that does not diminish its local landscape value.

7.4 The Landscape Institute Technical Guidance Note 02/21 – Assessing landscape value outside national designations. It states Landscape Value = the relative value or importance attached to different landscapes by society on account of their landscape qualities. The definition makes it clear that it is 'society' that assigns value to landscapes.

7.5 According to Technical Guidance Note 02/21 in the absence of local designation the value of the landscape should be assessed through Landscape Sensitivity studies and evaluation linked to landscape character assessment (See figure 1, p4).

7.6 The Applicants Landscape and Visual Appraisal states in its conclusions, ref 5.1.2,

'This is a recognisable and visually distinct landscape, with a strong sense of place and high historic continuity. This is a landscape which is well used and enjoyed by the public for outdoor recreation, walking, cycling and horse riding. There is a superb network of public rights of way which cross the study area, leading to a high landscape value.'

7.7 As such the site and wider area is a 'valued landscape' for the purposes of the NPPF 180(a). To demonstrate this I have assessed the landscape against the methodology shown in Box 5.1 of the GLVIA3 'Steps in assessing landscape effects' (p84).

Box 5.1

Range of factors that can help in the identification of valued landscapes

- **Landscape quality (condition):** A measure of the physical state of the landscape. It may include the extent to which typical character is represented in individual areas, the intactness of the landscape and the condition of individual elements.
- **Scenic quality:** The term used to describe landscapes that appeal primarily to the senses (primarily but not wholly the visual senses).
- **Rarity:** The presence of rare elements or features in the landscape or the presence of a rare Landscape Character Type.
- **Representativeness:** Whether the landscape contains a particular character and/or features or elements which are considered particularly important examples.
- **Conservation interests:** The presence of features of wildlife, earth science or archaeological or historical and cultural interest can add to the value of the landscape as well as having value in their own right.
- **Recreation value:** Evidence that the landscape is valued for recreational activity where experience of the landscape is important.
- **Perceptual aspects:** A landscape may be valued for its perceptual qualities, notably wildness and/or tranquillity.
- **Associations:** Some landscapes are associated with particular people, such as artists or writers, or events in history that contribute to perceptions of the natural beauty of the area.

Based on Swanwick and Land Use Consultants (2002)

7.8 When assessed against box 5.1 above from the GLVIA3 the landscape clearly exhibits high **Landscape Quality** (condition) and **Scenic Quality** as outlined in the LCA SPD. Ecological assessment of the site have shown that it exhibits **Conservation Interest**. A number of adjacent PROW and tourist facilities such as Brown Bank Caravan Park evidence the **Recreation Value** of the landscape. Finally the Perceptual Aspects are again outlined in the LCA SPD through a sense of wilderness and tranquillity experienced on the site. As such the landscape exhibited 5 of the 8 factors than can help in the identification of value in a given landscape.

7.9 The combination of the sensitivity with valued elements and features and the recreational value afforded by a range of PROW and residential properties clearly gives the landscape a highly valued status. Given that the value of the landscape is clearly linked to perceptions of landscape and scenic quality of the existing unspoilt landscape would be damaged by the proposed quarry development. The reduction in height and the removal of vegetation would lead to the complete removal of a key local landmark and landscape element.

8.0 Area of Disagreement- Quarries Form Part of the local Character

8.1 The LVA does indicate that the operational phase of the quarry would result in a medium magnitude of effects on landscape character:

'In relation to landscape character, the effects during the operational phase are considered to be of medium magnitude, where there will be a partial loss or an alteration of one or more key elements characteristic of the landscape, however these changes may not necessarily be considered to be substantially uncharacteristic when set within the context of the historic land use of the application site and wider study area.'

8.2 As such it is suggested that the impact is to some degree mitigated by the fact that the site was a quarry in the past. Quarries were in the area and now, as the Applicant states, form part of its character. But not working Quarries, with this specific site last fully operational over 100 years ago. A small unpermitted phase of extraction occurred 40 years ago. The character of the site within living memory is predominately that of the prominent feature of Horn Crag with the well established heather and rough grassland we see today. The LCA SPD does not mention operational quarries being part of the local character.

8.3 The passage of around a century has allowed distinctive moorland vegetation to establish. This together with weathering of the rock face has created an area of moorland with high scenic, ecological value and recreational. When viewed in the wider context the forms part of the typical pattern of enclosed pasture fields with areas of contrasting heather moorland. This is not a landscape comprising active quarrying and it has a completely different character.

8.4 The removal of mature vegetation and the exposure of clean stones faces would create a visual scare in the landscape at odds with the current mix of pasture and moorland. A quarry would not be in keeping with landscape that has largely avoided many of the industrial and urban influences that have blighted other parts of the district. Given the high sensitivity of the landscape character area a use of this type would cause long term damage to the integrity of the landscape and to landscape character.

9.0 Area of Disagreement- The Visual Assessment and Context.

9.1 The visual context submitted as part of the application acknowledges that Horn Crag is a prominent feature within this landscape area, reference section 2.3.6 in the LVA, where it states Horn Crag forms a visually prominent feature within the local landscape, especially from lower elevations to the south and closer viewpoints from the west where it appears as a prominent feature on the skyline. Reference LVA viewpoints 6,7 and 8. This contradicts the statement in item 5.3 of the Appellants Statement of case that Horn Crag cannot be described as a local land mark or prominent feature. Clearly it is a local landmark and is identified in the Appellants LVA as such.

9.2 From the higher longer viewpoints in particular from the West, the mix of heather, rough grassland and trees act as a distinct contrast in an area predominately of grazed upland pasture. LVA Viewpoints 9,10,11 and 12. I agree with elements of LVA but disagree strongly with the overall conclusions. The LVA underestimates the value and sensitivity of the landscape despite clear evidence from the LCA SPD.

9.3 Views of the site are not limited, as demonstrated by the Applicants LVA, as it is clearly visible from most aspects and elevations in the character area apart from areas to the North. The restoration proposals will reduce the profile of the site by about 10-15m, at its highest point, effectively removing a significant distinctive feature of Horn Crag. This would fundamentally alter the character of the area Reference the Application Drawings Topographical Survey E454-001 and 003 dated 30.08.2019, Cross – Sections E454-006 dated 17.11.23 and Restoration Contours Design E454-005 dated 17.11.21. As such item 5.3 within the Appellants Statement of case is not valid.

9.4 Whilst the impact on landscape character would be most pronounced during the operational phases of the quarry, impacts will extend for many years following restoration of the site. The existing moorland vegetation has taken many decades to mature. Given the critical role this vegetations play in terms of landscape character the visual appearance of the site will take around 10-20 years to recover. Even the high point that gives Horn Cragg its distinctive appearance and name will have been largely removed. As such the original character of the site would be permanently lost.

9.5 For this reason the assertion in the appellants statement of case, item no 5.6, that the significance of effects would be *'temporary and reversable'* is not accurate. The effects would be long term and extend for many decades without a full restoration of Horn Cragg being possible given the reduction in height.

10.0 Area of Disagreement- Assessment of Effects on Visual Amenity.

10.1 Viewpoints 1 and 2 will be impacted primarily during Phase 6 but would also impact on the longer views across the site to the distant skyline. I do not agree that the sensitivity would be low to medium as users of footpaths are generally considered to be of high sensitivity according to the GLVIA3. As such I would consider the sensitivity to be **High**.

10.2 I would consider the magnitude of change to be at a **Medium** level as the proposed quarry would remove the top 10-15m of the Horn Cragg in the middle distance and remove the moorland vegetation that contrasts with the adjacent enclosed pasture. As such the feature of Horn Cragg would be removed. Whilst the vegetation would recover in time this impact would be long term and the reduction in level would be permanent. I believe that overall the **High** sensitivity combined with a **Medium** magnitude of change would result in a **Major** significance of the effect during the operational phase reducing to a **Moderate Adverse** significance 10-20 years after restoration of the site was complete.



Viewpoint - No.1 Looking west from Footpath Silsden 19.	Grid Reference - SE 05754 48017	Image - Stitched panorama of multiple photographs
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Viewpoint - No.2 Looking south west from Bridleway Silsden 17	Grid Reference - SE 05622 48464	Image - Stitched panorama of multiple photographs
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Collington Water Environmental

Horn Crag Quarry, Silsden

10.3 Viewpoints 3 to 6. I disagree with the assessment and would suggest the effects to be largely **Moderate Adverse** due to the quarrying changing the character of the site which at present bleeds into the wider landscape setting. In conjunction with the existing visual detractors in these viewpoints there will be now be an accumulative effect.

10.4 I would again consider viewpoints 3,4 and 6 to be of **High** sensitivity as they are PROW with viewpoint 5 as being of **Medium** sensitivity. As such with a **Medium** magnitude of change and a receptor of **high** sensitivity the significance of the effect would be **Moderate to Major Adverse** for viewpoints 3,4 and 6 and **Moderate Adverse** for viewpoint 5. This would be during the operational phases of the quarry and would reduce to a **Minor to Moderate Adverse**, and **Minor Adverse** significance 10-20 years after restoration of the site was complete.

10.5 I largely agree with the assessment of views 7 and 8.

10.6 Viewpoints 9 – 12. As mentioned earlier our assessment from these western views is that the distinctive character of the gorse, heathland and rough grassland contrasts with the general view of upland pasture. Whilst these receptors are at some distance to the site the slope is angled towards the receptor which would make the change in vegetation type more pronounced. Furthermore the exposure of a rock face would be incongruous in the landscape. As such I consider the significance of effects to be **Minor to Moderate Adverse** effect during the operational phase reducing to a **Minor Adverse** significance 10-20 years after restoration of the site was complete.

10.7 In particular our assessment of viewpoint 10 is that the footpath would be a sensitive receptor and which together with a **Minor Magnitude** of change would result in a **Moderate Adverse** effect.

10.8 Viewpoint 13. Again I would consider the footpath to be sensitive which with a **Low** magnitude of change would result in a **Moderate Adverse significance of effects**.

11.0 Area of Agreement- Assessment on Effects on Visual Amenity

11.1 Viewpoints 14-22 are all assessed as having a **Major Adverse** significance of effects. I would concur with this assessment.

11.2 There are a number of key viewpoints where the assessment demonstrated a **Major Adverse** visual impact upon particular receptors. In particular Viewpoints from footpath 'Silsdon 18 (viewpoints 15 and 16) and Cringles Caravan Park (viewpoints 17,18, and 19) would be greatly impacted by the development. In total 9 viewpoints have been assessed as having a **Major Adverse** impact on views. I concur with this assessment.

11.3 The photograph used to illustrate the current view from viewpoint 15 is immediately adjacent to the proposed site would be fundamentally changed as a large proportion of the view would be transformed. Whilst views are available in other directions (as stated in the appellants Statement of Case) the eye would be drawn to the quarry from this vantage point due to its incongruous nature. To suggest walkers would just look the other way is not realistic. Similar impacts would occur at other located various points along the diverted path. I concur with the conclusion that the Significance of Effects would be **Major Adverse**.

11.4 The photograph from the LVA shows the extent to which the proposal would dominate the view from the southern border of the Caravan Park at Viewpoint 19. From this particularly sensitive receptor 'the proposal would cause a significant deterioration to an existing view'. This is due to the degree of change and the extent of the area effected over the long term. As such I agree with the assessment outlined in the report in terms of magnitude and effect during operation of the quarry. This viewpoint is particularly important as it effects a large number of permanent residents.

12.0 Area of Disagreement- Assessment on Effects on Residential Visual Amenity

12.1 Whilst I agree with the assessment in general I disagree with the assertion in the appellants statement of case that the impacts on residential areas will be 'limited'. The assessment of views from receptors 17,18 and 19 demonstrate that this is not the case. Views from settlements, primarily the Cringles Park, will result in **Major Adverse** effects as the LVA concludes. This is a residential site where around 50 residential properties are located. This constitutes a significant number of properties that would be particularly badly

effected by the quarry. As such the assertion in the appellants statement of case item 5.4 that 'views from the settlements are enclosed extremely limited' is not justifiable.

12.2 As shown on the LVA viewpoints 17-20 and 22. Whilst I agree with the findings of the LVA during operation of the quarry I do not accept that the impact are only temporary. The removal of around 10-15m of height from the feature together with removal of established vegetation will fundamentally alter the appearance and character of the site in the long term. This will not just be during operation of the quarry but for many years after restoration has been completed. This is clearly at odds with policy EN4.



13.0 Area of Disagreement- Assessment of effects on Tourism and Recreation

13.1 The proposals impact on views from Public Rights of Way, as demonstrated by the LVA viewpoints which are primarily from Public Rights of Way and from elevated positions to the East, where in addition to existing visual detractors identified in the Council SPD a new quarry will also impact due to the accumulative effect. The quarry would be an incongruous feature in the landscape that would be visible from a number of sensitive receptors.

13.2 The PROWs described as Silsden 18, Silsden 19 and the Bridleway Silsden 17 are well used paths that form an important network of recreational paths within a valued landscape. All 3 would be impacted by the quarry with Major Adverse effects demonstrated at paths 18 and 19. This will impact tourism and recreation. The presence of these paths together with numerous caravan parks and other types of accommodation in the area demonstrates its value for tourists. This is clearly at odds with policy EN4.



Viewpoint - No.15
Looking north from Footpath Silsden 18 (also representative of views from Silsden 19).

Grid Reference - SE 05305 47864

Image - Stitched panorama of multiple photographs

14.0 Areas of Disagreement-Screening effect of Vegetation

14.1 The Applicant states that most importantly, the vegetated western part of the site will remain as seen from the west. This will alter during the extraction of stone as is demonstrated by the changes in levels during extraction and after remediation. Reference the Application Drawings Topographical Survey E454-001 and 003 dated 30.08.2019, Cross – Sections E454-006 dated 17.11.23 and Restoration Contours Design E454-005 dated 17.11.21.

14.2 Whilst trees will be retained, they afford some screening but due to the scale of the site it will be relatively low impact and primarily from closer locations. This is evident from the LVA viewpoints submitted, in particular 9,10,11 and 12. The scale of the quarry would mean the screening effect of the trees was limited. As such item 5.5 in the Appellants Statement of Case is not valid.

15. Areas of Disagreement-Temporary nature of Visual Effects

15.1 Whilst in theory the site can be restored to some maturity over perhaps 35 years, the existing site and landscape character has taken about 100 years to establish into its distinct character. As such it will likely be decades from closure of the quarry until the vegetation establishes to the point where the colour and tone of the landscape is comparable to that at present.

15.2 This includes the tone of the newly exposed rock face, which will now extend the full length of the eastern boundary and significant parts of the northern and southern. Ref Schematic Restoration Scheme Features, Dwg 232/5-7 rev 3.1 dated 16.11. 2022. These will take many decades to weather so as not to be incongruous in the landscape.

15.3 Furthermore, much of the change will be permanent. The new profile also will remove significantly one of the main local landmarks due to the proposed finished levels. In all likelihood Horn Crag will cease to be a local landmark in future due to the removal of the features that currently make it a landmark. Reference the drawings referred to in 5.5.

16.0 Conclusions

16.1 I do not agree with the interpretation of the overall visual impact and the effect on landscape character. I consider many of the impacts upon particular receptors to be of a greater magnitude than assessed. This is in many instances due to an underestimate of receptor sensitivity and the assumption that the operational quarries are part of the local landscape character. PROW are normally considered to be sensitive receptors due to the nature of their use. Furthermore I do not agree that the impacts will be temporary as there will be a permanent reduction in height and effective removal of the landscape element.

16.2 I note that in 5.1.2, and I agree, that the sensitivity to change is high and this is a recognisable and visually distinct landscape, with a strong sense of place and high historic continuity. This is a landscape which is very well used and enjoyed by the public for outdoor recreation, walking, cycling and horse riding. There is a good network of public rights of way which cross the Rombalds Ridge area, leading to a high landscape value. When assessed against Box 5.1 in the GVLIA3 the landscape can clearly be described as valued.

16.3 Whilst the site was historically worked, it was over 100 years ago and for only a small part of the application site. The statement that further extraction will accord with the historic land use is erroneous as the site and wider landscape do not have working quarry sites. Furthermore the site and wider landscape is notably scenic with few industrial or urban influences. 40 years natural regeneration over time has resulted in a site now recognised as a natural asset and scenic recreational resource.

16.4 I would argue that any new working would now be seen as uncharacteristic. The question of time is also a factor, the time beyond the initial 20-year restoration period to reach target habitat conditions and then reach a character similar to the existing site which has taken a minimum of 40 years for a small part of the site and over a hundred years for the majority of the site.

16.5 As the site can be seen clearly from all the western viewpoints as well as the elevated locations in the east which are quite some distance from the site, the effects are not limited and localised and will have some impact on the wider landscape character. It has already been noted in 5.12 that the sensitivity to change is high.

16.6 . It is agreed that from views at a lower elevation, Horn Cragg appears as a prominent feature on the skyline. I would contend that the mosaic of vegetation at the application site enables Horn Cragg to blend into the landscape scene, in fact the mix of heather and rough grassland acts as a distinct contrast in an area of predominately of grazed upland pasture, especially from western viewpoints.

16.7 . As stated previously I consider the accumulation effect to be significant from these viewpoints with a quarry site adding to the impacts of the existing caravan parks at Brown Bank and Cringles.

16.8 It is acknowledged that Horn Crag is a prominent feature within this Landscape and the loss of the profile of around 10-15m in height due to the proposed quarry and loss of the distinctive existing vegetation will remove a significant feature in the landscape.

16.9 The prominent feature is White Cragg from viewpoints 9 and 10 but due to Horn Crag's vegetation, it is a distinct area within this area of predominately upland pasture and during the operational and restoration period be in our opinion a noticeable deterioration to an existing view.

16.10 I would contend the impact for viewpoint 12 is similar to those of 9 and 10. Viewpoint 13 would change the profile and highest point of Horn Cragg which is significant.

16.11 – 5.2.11 It is acknowledged that from the remaining viewpoints the proposal will result in a **Major Adverse** effect.

17.0 Summary

17.1 The statement rightly states the extraction period will be a slow process and I would agree the changes would be gradual but the nature of the site works cannot be said to be sympathetic to the local character as it is in effect a new quarry. Operational Quarry's are not a feature of this landscape area and as such the proposed quarry would be out of character.

17.2 The removal of a local landscape and distinctive feature cannot be said to 'make a positive contribution towards the conservation, management and enhancement of the diversity of landscapes within the landscape character area as required by policy. As such the development would be at odds with the LCA SPD and EN4 of the Bradford Core Strategy.

17.3 I do acknowledge that if permission is granted, after the possible 20-year period of working operation and the potential 15 years to achieve some level of maturity to the restoration that at that point the site should assimilate back into the broader landscape but with a significant change in character, predominately due to the finished changes in level. However this will have been achieved after a period of 35years and result in the loss of an area of distinct character and a local landmark within the broader character area. This would be in direct conflict with the policy guidance given in the LCA SPD and policy EN4 of the Bradford Core Strategy.

17.4 There would be significant negative impact on recreational use and upon the residents of Cringles Caravan Park and surrounding properties due to the visual impact of the quarry works.

18.0 Proposed Conditions

18.1 -Provision of detailed planting plans and specifications as part of the restoration and mitigation strategy.

18.2 -Provision of detailed restoration programme with key dates for completion of each stage.

18.3 -A long term Management Plan for the phased Restoration Plan.