

# **PROPOSED ADVANCED ENERGY RECOVERY FACILITY: ALTON**

## **FINAL REVIEW OF ENVIRONMENTAL STATEMENT**

### **CHAPTER 5 - LANDSCAPE AND VISUAL EFFECTS**

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On Behalf of Satius Consulting**

**For:  
HAMPSHIRE COUNTY COUNCIL**

**PLANNING AUTHORITY REFERENCE: 33619/007**

**DATE: 21<sup>ST</sup> MAY 2021**

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## **I. Executive Summary**

- I.1 Indigo were commissioned by Satius Consulting, appointed in November 2020 by Hampshire County Council (HCC) to undertake a review of Chapter 5 Landscape and Visual Effects (“the Assessment”), of the Environmental Statement (ES), which was submitted with a planning application for the proposed development of an Energy Recovery Facility (ERF) and Associated Infrastructure at Alton Materials Recovery Facility, A3, Alton, GU34 4JD (planning application 33619/007).
- I.2 Landscape Institute Technical Guidance states that the purpose of reviews is to evaluate the adequacy and quality of the content of Landscape and Visual Impact Assessments and Landscape Visual Impact Appraisals. I am therefore applying that approach to my analysis of the Environmental Statement, Chapter 5 Landscape and Visual Impact Assessment. Hampshire County Council has also asked me to summarise my views and my position regarding this Assessment.
- I.3 The review takes into account the Regulation 25, Matters of Clarification submission, responses of HCC Landscape Team, Statutory consultees and organisations representing the public.
- I.4 This review is carried out in accordance with Landscape Institute best practice guidance. The review is set out using the criteria and headings/steps as they appear in the Technical Guidance note, i.e.:
- i) Checking the methodology used to undertake the assessment, the criteria selected (including balance between), and the process followed;
  - ii) Checking the baseline content and findings of the Assessment;
  - iii) Checking the presentation of the Assessment findings.
- I.5 The key findings of the review are summarised and listed below:
- The Assessment provides a highly detailed analysis of the Landscape and visual effects of the proposal.
  - The Assessment’s Methodology is clearly set out; however, there are some inconsistencies with its application within the Assessment.
  - Terminology used within the Assessment and Methodology can downplay or distort the levels of effects identified.
  - Certain receptors are under-represented in the analysis of potential Landscape and Visual effects.
  - The Assessment’s analysis of relevant published county, district and local character area appraisals appears limited and inconsistent. It does not take account of important and relevant observations in relation to susceptibility, sensitivity and capacity.
  - The Assessment gives insufficient weight to relevant capacity studies.
  - In the context of the SDNP and its setting, the Assessment gives insufficient weight to visual effects identified in the area to the south of the site, on the boundary of the SDNP and in the area comprising views from St. Swithun’s Way.
  - The Assessment’s analysis of the value of land to the North of the Wey Valley is underplayed, as the area demonstrates attributes that raise its value above medium.

- There is insufficient crossover with heritage and ecology. The baseline does not fully take account of historic landscape characteristics when describing the effects on landscape character and the setting of the SDNP.
- The frequency of the plume emissions is not clear.
- Whilst many of the visualisations are fit for purpose, some are not clear and/or too dark due to poor weather conditions.
- In the context of the SDNP and setting, the Assessment is limited in its analysis of the appreciation and perceptual experience of the character of the landscape by people travelling to and from the SDNP.

#### 1.6 **Conclusions and recommendations**

- 1.7 In the light of the above I take the view that the Assessment does not provide a complete analysis, and is not therefore adequate. My position would be to recommend that the conclusions of the Assessment are not accepted.

## **2. Introduction**

### **2.1 Background**

2.2 Indigo were commissioned by Satius Consulting, appointed in November 2020 by Hampshire County Council (HCC) to undertake a review of Chapter 5 Landscape and Visual Effects (“the Assessment”), of the Environmental Statement (ES), which was submitted with a planning application for the proposed development of an Energy Recovery facility (ERF) and Associated Infrastructure at Alton Materials Recovery Facility, A3, Alton, GU34 4JD (planning application 33619/007).

2.3 An Initial Review was carried out that considered the submitted Assessment and identified additional landscape and visual information to be requested from the Applicant under Regulation 25. The review also identified further matters for clarification, which was also requested from the Applicant.

2.4 Following submission of this information Indigo undertook a final review of the documentation, taking into account the responses made by HCC Landscape Team, statutory consultees and interested third parties. This included an initial check to ensure all documentation supplied as per the Applicant’s covering letter and list of contents.

2.5 The purpose of this Final Review Report is to set out the findings of the review process and the reviewers overall conclusions. This Final Review Report is accompanied by and informed by the Initial Review.

2.6 The entire review has been undertaken by Fiona Sharman, an Consultant Landscape Architect at Indigo Landscape Architects Limited, a landscape architectural consultancy based in Salisbury, Wiltshire. Fiona is a Chartered Member of the Landscape Institute with over 15 years’ experience in Landscape and Visual Assessment.

2.7 This review takes account of consultation responses received from statutory consultees, HCC Landscape Planning Team and organisations /groups representing the public.

### **2.8 Scope and Methodology**

2.9 The following steps were undertaken in the production of this review:

- Initial desktop study of ES Chapter 5, Landscape and Visual Effects, and related planning documentation and consultation responses.
- A site visit was made on 23<sup>rd</sup> November to test the assessment of reported landscape and visual effects, and to determine whether any additional information would be helpful to the understanding of the potential impact of the proposals on their surroundings.
- A meeting was held with HCC and the Applicant on 2<sup>nd</sup> December 2020 to confirm Matters of Clarification prior to the release of HCC’s Regulation 25 letter.
- An addendum was issued on 14<sup>th</sup> December 2020 to confirm the outcome of the meeting and Matters of Clarification.
- Desktop study of Regulation 25 and Matters of Clarification submission and consultation responses.

- Final overview of all documentation
- An additional site visit made on 1<sup>st</sup> April 2021 to verify the findings of the review and the Regulation 25 and Matters of Clarification submission.

2.10 This review is provided in accordance with the following best practice guidance:

- Guidelines For Landscape and Visual Impact Assessment 3<sup>rd</sup> edition.<sup>1</sup>
- Reviewing Landscape and Visual Impact Assessments and Landscape and Visual Appraisals<sup>2</sup>

2.11 For ease of reference and transparency of the review process the review is set out using the criteria and headings/steps as they appear in the Technical Guidance note.

2.12 **Limitations of the review**

2.13 This review takes account of consultation responses received from statutory consultees, HCC Landscape Planning Team and organisations /groups representing the public. This review does not take into account individual representations from the public.

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<sup>1</sup> Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) prepared jointly by the landscape Institute and the Institute of Environmental Management and Assessment and published on the 17<sup>th</sup> April 2013.

<sup>2</sup> Reviewing Landscape Visual Impact Assessments and Landscape and Visual Appraisals - Landscape Institute Technical Guidance Notes 1/20 (10 Jan 2020)

### **3. The Review - Step 1: Checking the Methodology, Criteria and Process**

[The following questions in bold are taken from “Reviewing Landscape and Visual Impact Assessments and Landscape and Visual Appraisals - Landscape Institute Technical Guidance Notes 1/20”(10 Jan 2020).]

#### **3.1 Does the scope of the Assessment meet the requirements set out in the Scoping Opinion and/or as defined in the LVIA or LVA and, if substantively different, are the reasons clearly set out and explained?**

3.1.1 The scope of the Assessment is referred to in ES Chapter 5, paragraphs 5, 3, 9 -11, where it states that ‘*the scope was modified on receipt of HCC’s scoping opinion and includes responses from other consultees and further consultation was undertaken to agree viewpoint locations*’. I am satisfied that this is the case.

#### **3.2 What consultations have been carried out and have responses been acted upon? Has the scope and methodology of the Assessment been formally agreed with the determining authority? If not, why not? As part of the methodology, has the terminology been clearly defined, have the criteria to form judgements, including thresholds, been clearly defined and have any deviations from good practice guidance (such as GLVIA 3) been clearly explained?**

3.2.1 The scope and methodology was formally agreed with the planning authority (including the initial selection of representative viewpoints) and the scope was extended as a result of the findings of the initial review and feedback from consultees.

3.2.2 The criteria to inform judgements, including thresholds is set out within the Assessment’s Appendix 5.1: Methodology and the Assessment follows good practice guidance. Two Chartered members of the LI have undertaken the LVIA.

3.2.3 Terminology, thresholds, and criteria are discussed further in steps two and three. A glossary of terms would have been useful to aid clarity.

#### **3.3 Does the Assessment demonstrate a clear understanding and provide a separate consideration of landscape and visual effects?**

3.3.1 Chapter 5, Appendix 5.1 of the ES demonstrates a clear understanding of the approach to the Assessment of landscape and visual effects and as being separate to one another. Chapter 5, paragraphs 5.1.2 to 5.1.4 confirms this approach. And sections 5.4 and 5.5 separates the landscape baseline and Assessment of effects from the visual baseline. Appendix 5.2: Visualisation Methodology sets out how the visualisations are prepared.

3.3.2 The approach to the Assessment of the separate landscape and visual effects is discussed in Step 2 of this review. It is borne in mind that the No Wey Incinerator Group (NWIG) have noted a potential over-reliance/emphasis on the visual effects of the proposal<sup>3</sup>. These matters are discussed further in Step 2 of the review.

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<sup>3</sup> Para’s 3.1.3 & 3.1.6 pages 3&4 – Landscape Response. Terra Firma Consultancy Ltd – 4<sup>th</sup> Feb 2021

3.4 **Does the Assessment demonstrate comprehensive identification of receptors and of all likely effects?**

3.4.1 Potential receptors are identified within ES Chapter 5 and the subsequent Regulation 25 response and Matters of Clarification submission. The likely visual effects are clearly identified within the areas assessed, although some areas appear under-represented and there are some elements in relation to landscape effects that are not clearly identified. These are discussed in Step 2.

3.5 **Does the Assessment display clarity and transparency in its reasoning, the basis for its findings and conclusions?**

3.5.1 On the whole the Assessment displays clarity and transparency in its reasoning. However, it does not always take into account the full evidence base. For example, a detailed analysis of the information contained in published character appraisals and capacity studies is still lacking.

## 4. **Step 2 – Baseline Content and Findings of the Assessment**

### 4.1 Introduction

4.1.1 The following section considers the Assessment’s description of the baseline, both in narrative and by illustrations or plans, photographs, drawings etc. Other sources have been taken into account such as published character appraisals, the South Downs National Park Management Plan<sup>4</sup> and consultation responses. In order to complement this and verify baseline information the reviewer has carried out two site visits, both prior to and following the submission of the Regulation 25 information and clarification details.

### 4.2 **Scope, content and appropriateness (detail, geographic extent) of both the landscape and the visual baseline studies which form the basis for the Assessment of effects.**

4.2.1 As set out previously in step 1, the scope of the Assessment was clearly defined at the scoping stage and was extended following the Initial Review. This was addressed through the Regulation 25 request that also contained a list of matters for clarification for which the Applicant has submitted information that provides a comprehensive approach (as also noted by the Landscape Team and SDNP in their consultation responses<sup>5</sup>).

#### 4.2.2 Detailed Study Area for PRow

4.2.3 As requested as per Matters of Clarification, the Applicant has provided a detailed and thorough narrative analysis of PRow within 2 kms of the development. This analysis allows for a more thorough assessment of the potential visual effects within the area in addition to those effects identified from individual viewpoint locations, thus reducing the reliance on specific viewpoints to illustrate the potential visual effects within an area.

4.2.4 The provision of the additional information does demonstrate the appropriateness of defining a detailed Study Area and basis from which to assess effects; however, as part of an iterative process this should lead to further narrative where the analysis highlights the potential for significant or borderline visual effects beyond 2km. Also, given the potential for significant effects within 2 km then it makes sense, as a matter of transparency, to accord the same proportionality to residential properties, minor roads and lanes, which are used by walkers, cyclists and horse-riders and can be considered to be of high sensitivity in this regard. It is noted that the NWIG state that *‘considering the high incidence of potentially significant adverse effects that have been identified along PRow within 2 kms of the proposed development site, we believe there is reasonable cause to extend the area of reach beyond the 2km threshold. Doing so may well have revealed more potentially significant effects’*<sup>6</sup>.

#### 4.2.5 Landscape character

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<sup>4</sup> South Downs National Park- Partnership Management Plan 2020 - 2025

<sup>5</sup> Para 5.61 Landscape Planning Advice note for HCC dated 21/02/2021, SDNP – Neighbouring Authority Consultation 15th Feb 2021

<sup>6</sup> Landscape Response. Terra Firma Consultancy Ltd – 4<sup>th</sup> Feb 2021

- 4.2.6 Pages 9 to 16 of ES chapter 5 describe the key characteristics of the relevant published county and district character area appraisals and extracts of these are contained in the Assessments Appendices 5.4 a,b&c. The Assessment lists the key characteristics of the County area 3f and District area 4b in paragraphs 5.4.25 to 5 4.28 and selectively makes reference to and quotes some of the identified threats and issues. Appendix 5.6 lists the key characteristics of County areas 3f and 13b only. The commentary and analysis does not make reference to the overall strategies and management guidelines that are equally important to understanding the baseline.
- 4.2.7 Paragraph 5.4.29 of the Assessment and pages 9 to 11 of the Matters of Clarification submission refer to the consideration of the EHDC Capacity Study<sup>7</sup>. However, this consideration is in relation to value, and the Assessment's consideration is limited in terms of the Capacity Study's ascribed susceptibility and sensitivity levels. Whilst the purpose of the Capacity Study relates to the capacity of the area to accommodate housing, it does contain important observations that are relevant to this proposal. Appendix 5.5: Effects on landscape character focuses mainly on the effects on the County Character Area and its reference to the district and local character areas appears limited overall, even though the Applicant states that these have been taken into account. Landscape elements and features namely physical Influences; influences of human activity; and aesthetic and perceptual factors have not been individually considered in the baseline.
- 4.2.8 Lighting
- 4.2.9 The Applicant has provided a detailed response at Chapter 8 of the Matters of Clarification in relation to the request for more information regarding the lighting of the proposal. The information is clear and sufficient to inform the nature and levels of effects.
- 4.2.10 Residential and Visual Amenity
- 4.2.11 The additional information supplied at Section 10 of the Clarification report in relation to residential and visual amenity is useful. In relation to supportive graphic evidence, it would have been useful if the description of effects had been supported by more detailed aerial views/plans overlaid with Digital Terrain Model ("DTM ZTV"), with the names of the properties identified in a key. Figure 11 is useful in this regard; however, each property requires a close up plan view for the evidence to be clear and transparent.
- 4.2.12 Ecology and Cultural Heritage
- 4.2.13 These are discussed later in this review at paragraph 4.5 in relation to the discussion regarding the cross over with ecology and cultural heritage matters.
- 4.2.14 SDNP and setting
- 4.2.15 SDNP - Baseline information

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<sup>7</sup> East Hampshire District Council – Landscape Capacity Study - Terra Firma Consultancy Ltd. September 2018

- 4.2.16 ES Chapter 5 refers to the SDNP Management Plan, and in paragraphs 4.9, 5.4 and 5.31 identifies the Special Qualities of the SDNP and specific landscape areas relevant to the Study Area i.e the Scarp Slope, Western Weald and Western Downs. Extracts of the South Downs Management Plan are provided at the Assessments Appendices 5.4c, d & e.
- 4.2.17 Neither the Assessment or additional information clearly states what the Statutory Purposes and Duty of the SDNP are. Although the Assessment sets out what the Special Qualities are which relate to Statutory Purpose 2, there is no explanation as to why the 1<sup>st</sup> Statutory Purpose ('To conserve and enhance the natural beauty, wildlife and cultural heritage of the area') and the duty ('To seek to foster the social and economic wellbeing of the local communities within the National Park in pursuit of our purposes') are not mentioned.
- 4.2.18 At paragraph 5.4.31 the Assessment identifies the SDNP Character Area J: East Hampshire Greensand Terrace, that is relevant and closest to the site. An extract of this document is provided at Appendix 5.4a. The Assessment states on page 29 that this Character Area is taken into account in Appendix 5.5, in the context of its Assessment of the County Character Area 13b: East Hampshire Hangars. However, the extent to which the Area J is taken into account is not easy for this review to clarify as the assessment has been made in the context of the different County Character Area 13b: East Hampshire Hangars. As an example the assessment in paragraph 5.4.31 selectively quotes one characteristic from the SDNP Character Area J i.e the '*small scale and intimate character with restricted views*'. However, this overlooks other relevant characteristics such '*views over the adjacent lowlands from the edge of the greensand scarp*'.<sup>8</sup>
- 4.2.19 Pages 16 to 18 of the Assessment appropriately describe the baseline environment in relation to the SDNP Tranquility Study<sup>9</sup>, Green Infrastructure Study<sup>10</sup>, View Characterisation and Analysis Study<sup>11</sup> and the Hampshire Historic Landscape Assessment<sup>12</sup>.
- 4.2.20 The SDNP in their initial consultation response states '*the baseline information is not comprehensive and fails to generate a meaningful understanding of the landscape and particularly its importance culturally/historically*'<sup>13</sup>. I agree with this view.
- 4.2.21 In relation to the above paragraph further baseline landscape and visual information was requested and supplied by the Applicant in response to the Regulation 25 request. This further baseline information consists of:
- Detailed analysis of specific areas (identified in paragraph 2.1.2).
  - A more detailed analysis of the SDNP View Characterization Analysis Study<sup>14</sup> which the Assessment uses to define the setting (Chapter 2.3).
  - Additional SDNP viewpoints at Figures A-J.
  - Views from PRoW in SDNP: Appendix A1-A9- Photo sheets.

<sup>8</sup> Page 5 South Downs National Park Landscape Character Area J East Hampshire Greensand Terrace

<sup>9</sup> South Downs National Park Authority- Tranquility Study 2017

<sup>10</sup> South Downs National Park Authority - Green Infrastructure Framework 2016

<sup>11</sup> South Downs National Park Authority -View Characterisation and Analysis Study. Land Use Consultants 2015

<sup>12</sup> Bramhill, P. & Lambrick, G. 1999 Hampshire Historic Landscape Assessment Final Report

<sup>13</sup> South Downs National Park Authority - Neighbouring Authority Consultation 14<sup>th</sup> August 2020

<sup>14</sup> SDNP View Characterisation and Analysis Study. Land Use Consultants 2015

- SDNP cumulative viewshed map and DTM ZTV night-time effects.
- 4.2.22 The landscape baseline is limited in its description and analysis of the perceptual and anticipatory experience of visitors to the SDNP when travelling through its setting. Although the Study Area does not contain an official ‘Gateway’<sup>15</sup> to the SDNP the area to the south of the A31 is evidently used to access the SDNP by a variety of users.
- 4.2.23 Without a clear definition of what the setting to the SDNP is in the context of the Study Area (this is not defined by the SDNP), the Applicant is left to make their own professional judgement. In terms of further information relating to baseline evidence for the setting of the SDNP, the Applicant seeks to define the setting in relation to the View Characterisation and Analysis Study and this is useful and appropriate. However for clarity there does not appear to be any clear definition or conclusion as to what the Applicant considers the setting to be. The Applicant does not state in any of their documentation whether they consider the site to be located outside or within the setting of the SDNP.
- 4.2.24 In order to provide evidence for and to define the setting a more detailed analysis of this would be appropriate, referencing sources that have already considered this. For example The EHDC Landscape Capacity Study notes that areas 4b.1 and 4b.2 are within ‘*the setting of the SDNP as there is some limited intervisibility and potential for affecting perceptual character.*’<sup>16</sup>
- 4.2.25 The Capacity Study also states at page 10, para 28 that ‘*Parts of the Study area are within the setting of the SDNP. For the purposes of spatial planning, any development or change capable of affecting the significance of the SDNP or people’s experience of it can be considered as falling within its setting. The scale, height, siting, use, materials or design of a proposed development will determine whether it affects the natural beauty and special qualities of the SDNP. A very large or high development may have an impact even if some considerable distance from the SDNP boundary. Therefore, there is no defined boundary where the setting of the SDNP ends. However, distance away from the SDNP will obviously be a material factor in that the further away a development is from the boundary the more the impact is likely to be reduced.*’
- 4.2.26 In relation to the visual analysis, the assessment is both extensive and detailed, and the SDNP in their second consultation response acknowledge this<sup>17</sup>. For consistency and transparency, it would have been useful if the additional SDNP viewpoints had been included in the updated Appendix 5.6 as they are difficult to find within the narrative and interchangeably referred to by their location number or Appendix name. Furthermore (and importantly), the viewpoints are inconsistently assessed; some of the effects are described and others are omitted; and the additional summary list provided by the Applicant makes no reference to the SDNP viewpoints.

<sup>15</sup> <https://www.southdowns.gov.uk/?s=gateway>

<sup>16</sup> Pages 6 and 16, East Hampshire District Council – Landscape Capacity Study - Terra Firma Consultancy Ltd. September 2018

<sup>17</sup> SDNP – Neighbouring Authority Consultation 15th Feb 2021

**4.3 Has the value of the landscape and visual resources been appropriately addressed including (but not necessarily limited to), considerations of: local, regional and national designations, rarity, tranquility, wild-land and valued landscape?**

4.3.1 The Applicant's assessment of value accords with their Methodology given at Appendix 5.1. There is no discussion of landscape value within ES Chapter 5, however Appendices 5.5 and 5.6 contain an Assessment of value in relation to the County landscape character areas and representative viewpoints whilst making reference to the attributed values for local areas 4b.1 and 4b.2 in the EHDC Capacity Study.<sup>18</sup>

4.3.2 In terms of landscape character, the Assessment attributes a value of Medium to County Character Area (CCA) 3F: Wey Valley and Medium to High Value for CCA 13b: East Hampshire Hangars and according to the Applicant this takes account of the District and Local Landscape Character Areas. The EHDC Capacity Study<sup>19</sup> ascribes a medium value to Local Areas 4b.1, 4b.2, 6c.1, 6c.2, 6c.3 and 6c.4. It is noted that the Applicant raises the value of 13b: East Hampshire Hangars to medium to high to take account of the setting of the SDNP which is appropriate and proportional.

4.3.3 However it should be borne in mind that the Council For The Protection of Rural England (CPRE) consider in their consultation response<sup>20</sup> that the tract of land running northwards from the A31 in the vicinity of the Site has demonstrable attributes that raises it above the ordinary, such that it is a "valued landscape" to which NPPF paragraph 170(a) applies and requires to be protected. The CPRE cite the following attributes:

- *the attractive and distinctive landscape with a fine long distance view over the Wey Valley to the South Downs National Park and to the West over Alton*
- *the high quality chalk landscape in the upper part of the Valley, and overall sense of tranquility*
- *the high quality public experience of this landscape from public and permissive rights of way and the Saints Swithun's Way long distance path*
- *the important contribution of distinctive landscape to the characteristics identified in LCA 3F- Wey Valley in HILCA and LCA4b - Northern Wey Valley in HLCA<sup>21</sup>*

4.3.4 The Applicant makes a rebuttal to this in section 3.3 of their Letter of Clarification that maintains, in para 3.3.3, 'the area of the Wey Valley immediately to the north of the Site is not considered to be a 'Valued Landscape' in the context of the NPPF.' However, in accordance with GLVIA 3<sup>22</sup> the local value of this landscape is important and as cited by the quoted CPRE comment above there are local attributes that potentially raises its value. Other than the second listed attribute, the land 'immediately' (what constitutes this area exactly is not defined) to the north of the site demonstrates the above attributes and contributes to the wider area<sup>23</sup>. I would therefore consider the value of this landscape to be higher and compatible with that of 13b: East Hampshire Hangers i.e medium to high.

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<sup>18</sup> East Hampshire District Council – Landscape Capacity Study - Terra Firma Consultancy Ltd. September 2018

<sup>19</sup> East Hampshire District Council – Landscape Capacity Study - Terra Firma Consultancy Ltd. September 2018

<sup>20</sup> Council for the Protection of Rural England (CPRE) Consultation response. 10<sup>th</sup> February 2021

<sup>21</sup> Page 2 Council For The Protection of Rural England (CPRE) Consultation response. 10<sup>th</sup> February 2021

<sup>22</sup> Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) prepared jointly by the landscape Institute and the Institute of Environmental Management and Assessment and published on the 17<sup>th</sup> April 2013.

<sup>23</sup> Stroud DC v SSCLG and Gladman- Inspectors Report

#### 4.3.5 Tranquillity

4.3.6 In relation to the Applicant's assessment of landscape value above, emphasis and comparison is made regarding levels of tranquillity around the A31 corridor (paragraphs 3.3.2, page 14 quote the HICA 3F: Wey Valley Appraisal) and I agree that tranquillity is eroded by the presence of the transport corridors (A31 and railway line) and the nature of built form. As one moves further south or north away from the A31 corridor visual and aural tranquillity increases rapidly. The EHDC Capacity Study identifies erosion of tranquillity as a potential effect on key landscape characteristics<sup>24</sup> for Areas 4b.1 and 4b.2 , however the Assessment does not refer to this.

4.3.7 Due to its scale the proposal would rise above the valley floor and in some views where the proposal is visible, the valley floor and transport corridors cannot be seen and are often inaudible. The proposal would therefore detract from the perception of tranquillity in these locations.

4.3.8 The Assessment also considers the tranquillity baseline at paragraphs 5.4.37 and 5.4.38 in relation to the SDNP Tranquillity Study<sup>25</sup>, where tranquillity is acknowledged as a Special Quality of the SDNP. The assessment of effects on tranquillity are set out in detail on pages 46 and 47 of section 5.5 of the Assessment.

4.3.9 Tranquillity is also discussed later in this review in relation to visual tranquillity (para 4.13.9) and perceptual qualities (para 4.13.18).

#### 4.4 **Have the criteria to inform levels of sensitivity (both landscape and visual) and magnitude of change been clearly and objectively defined, avoiding scales which may distort reported results?**

4.4.1 ES Chapter 5, Appendix 5.1 sets out the Applicant's methodology for assessing/making judgements in relation to value and susceptibility in order to inform their levels of landscape and visual sensitivity which are applied to their Assessments of effects.

#### 4.4.2 Value

4.4.3 The Applicant's approach to the assessment of value is discussed in the preceding section and therefore not repeated here.

#### 4.4.4 Susceptibility

4.4.5 The criteria to inform levels of susceptibility are clearly set out in the Assessment's Methodology at Appendix 5.1 and applied in the assessment of Landscape and Visual effects at Appendices 5.5 and 5.6.

4.4.6 The applicant has not made an overall judgement of susceptibility that is independent of their assessment of character areas.

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<sup>24</sup> Pages 13 & 22, East Hampshire District Council – Landscape Capacity Study - Terra Firma Consultancy Ltd. September 2018

<sup>25</sup> Tranquillity Study, South Downs National Park Authority 2017

4.4.7 It bears repeating that susceptibility is specific to the nature of the development being proposed. In relation to landscape I have concerns that the susceptibility in relation to elements of scale and connections with adjacent areas and visual interruption may be higher for 3F (Wey Valley). This is borne out by findings within the published character appraisals. For example, the Hampshire Integrated character assessment identifies 'Threats' as:

*'Potential of the vulnerability of open uninterrupted skylines to tall vertical structures which break the flow of the landscape and undermine the scale of the Valley'.*

*Sensitivity of high visibility of changes on the Valley sides and potential for inappropriate or visually intrusive development and Woodland felling'.<sup>26</sup>*

4.4.8 Regarding tall, vertical structures the Assessment refers to the existing pylons in relation to their being perceived as a detractor in the landscape. The Assessment implies that the landscape can therefore accommodate the proposal as there are already 'detractors' present in the landscape.

4.4.9 However the addition of the proposal into the baseline situation where pylons are already present could result in additional combined harm to the highly susceptible characteristics identified in Threat one above.

#### 4.4.10 Sensitivity

4.4.11 The Applicant describes the sensitivity of County Character Areas 3F: Wey Valley and 13b: East Hampshire Hangars. The Assessment states that it takes account of the district and local character areas when considering sensitivity. However, while Appendix 5.1 refers to Value in the Capacity Study, it is not clear that ascribed levels of sensitivity in the Capacity Study have been taken into account. For example, the EHDC Capacity Study states that the area 4b.1 has an overall landscape sensitivity of medium to high. The Study also states the sensitivity in relation to the wider area as medium to high<sup>27</sup>. As Susceptibility is relative to the nature of the development proposed, the sensitivity could be greater than that that stated in other studies, and due to the scale of the development the sensitivity may rise.

4.4.12 It is noted that in appreciation of the context of the setting of the SDNP the Assessment has raised the sensitivity of County Landscape Character Area 13b: East Hampshire Hangers to medium to high and that is appropriate.

4.4.13 The assessment also appears to downplay the historic sensitivity of the Wey Valley, as described in Forces For Change sections 7.1 to 7.3 within the HICA.<sup>28</sup>

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<sup>26</sup> Hampshire Integrated Character Assessment -3F Wey Valley. Hampshire County Council 2015, page 11

<sup>27</sup> Page 12 East Hampshire District Council – Landscape Capacity Study - Terra Firma Consultancy Ltd. September 2018

<sup>28</sup> Pages 9-11, Hampshire Integrated Character Assessment -3F Wey Valley. Hampshire County Council 2015

#### 4.4.14 Magnitude

- 4.4.15 In relation to the Assessment of the magnitude of landscape effects, the Applicant describes the magnitude of effects on the County Character Areas 3F: Wey Valley and 13b: East Hampshire Hangars. By only describing the magnitude of effects for these County Character Areas the magnitude of effects has been distorted as they are predicted within the context of a much wider area. This serves to distort (in this case reduce) the severity or extent of an effect. Whilst the Assessment states that it takes account of the district and local character areas, it is not clear that this has been done.
- 4.4.16 Furthermore, as set out in paragraph 4.4.15 above there has been no analysis of the effects on the physical influences, influences of human activity, or aesthetic and perceptual factors that contribute to landscape character. Effects have only been assessed on a character area basis and in the context of the whole character area. An assessment on the effects on the landscape character of the area surrounding the site has not been undertaken.
- 4.4.17 Even though Appendix 5.1:Methodology (Table 2.2) sets out thresholds of magnitude in relation to the extent of an area, due to the scale of the proposal, the magnitude of change would be likely to affect that entire character area and this differentiation has not been made. By not applying magnitude assessment to district and local areas, the effects are distorted. What is deemed to be a 'localised' effect should not diminish the impact of the predicted effects.
- 4.4.18 There are issues with regard to definition. Table 2.2, "Magnitude of Landscape Change Criteria (indicative)" uses the following terms: "*extensive geographical areas*", "*large geographical areas*" "*relatively localised geographical areas*" and "*small geographical areas*". These terms are not defined and are open to subjective interpretation. For example, does "relatively localised geographical area" mean an area of 100 sq metres or 1000 sq metres, or something else?

#### 4.5 **How well is the cross-over with other topics, such as heritage or ecology, addressed?**

##### 4.5.1 Heritage

- 4.5.2 The Applicant has provided, as Matters of Clarification, more information in relation to some aspects of heritage. In section 3.2: Other Studies, the Applicant explains and justifies why Townscape Assessment and Conservation Area Appraisals have not been used to inform the Assessment as the DTM ZTV evidence presented demonstrates that these areas are largely outside the DTM ZTV. This method is only appropriate if these studies do not make observations in relation to the setting or the landscape context of the Townscape or Conservation Areas.
- 4.5.3 In terms of heritage the Assessment correctly refers the reader to Chapter 10 of the ES. Paragraph 5.1.10 states '*the LVIA and cultural heritage assets whilst sometimes considering effects upon the same receptors, deal with different environmental effects, using different methodologies*'. Although this remains within their professional remit, it would have been

useful if more cross-referencing had been provided along with consideration of effects on heritage assets and their setting in landscape terms.

- 4.5.4 Section 4 of the Matters of Clarification sets out the effects on other landscape designations that include the Conservation Area at Froyle and Registered Parks and Gardens. Although intervisibility with the Froyle Conservation Area is negligible its setting to the south west shares intervisibility with the proposal and contains receptors of high visual sensitivity such as users of the St Swithun's Way. This is an example of where consideration of the effects of the proposals on heritage assets and cross referencing with the Cultural heritage report would have been appropriate and useful.
- 4.5.5 There is an evaluation of the Hampshire Historic Landscape Assessment<sup>29</sup> in paragraphs 5.4.42 and 5.4.53 of the Assessment and I concur that due to its age this document might not reflect recent changes. Therefore, I would expect to see greater cross-reference to the Heritage Assessment to fully appreciate the historic landscape character baseline; what the local designated assets are; the contribution that they make to local character; and the effects the proposals would have on the way these assets are experienced, as this is not entirely clear in the Assessment.
- 4.5.6 An example of the above point relates to the Assessment of landscape character at Appendix 5.5 in relation to 3F: Wey Valley, that takes quite a broad approach and states that in relation to its assessment of value that '*locally designated heritage interest, concentrated in settlements*'. This overlooks and somewhat contradicts the 3F Wey Valley key characteristic that refers to: '*many historic features associated with the River Wey eg Mills, Weirs, water cress beds*' plus there are isolated historic farmsteads such as Bonham's Farm. Local Character Area 4b.1 Alton to Bentley identifies in relation to landscape sensitivity, the Roman settlement (Scheduled Monument) at Cuckoo Corner to the east of Holybourne.<sup>30</sup> The Assessment should describe the way in which the proposal would affect the experience of these assets and/or their setting.
- 4.5.7 It would have been useful if the representative viewpoints in appendix 5.6 and the PRoW narrative had picked up the historical and heritage context in the description of the visual experience. Viewpoint 4 for example, is located close to the River Wey and historic waterway infrastructure associated with the mills, and Viewpoint 8 for example, is located close to the Roman Settlement at Cuckoo Corner and Church of the Holyrood. Viewpoint 13 does not mention the listed status or setting of Bonham's Farm that is within the view.
- 4.5.8 Ecology
- 4.5.9 Ecology is assessed separately in ES Chapter 6.
- 4.5.10 The ecological benefits of the proposal are referred to in ES chapter 5, section 5.2 in relation to the proposed developments description of the green walls and the landscape proposals on site. I can find no reference to the Ecological Assessment within the ES Chapter 5 or additional information supplied.

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<sup>29</sup> Hampshire Historic Landscape Assessment - Hampshire County Council and English Heritage. Lambrick G and Bramhill P 1999

<sup>30</sup> Page 11 East Hampshire District Council – Landscape Capacity Study - Terra Firma Consultancy Ltd. September 2018

#### 4.6 **Is there evidence of an iterative assessment design process?**

4.6.1 For details regarding the design process, the Assessment refers the reader to ES Chapter 4: Design Evolution Document. Section 1.5, page 5: Design Concept states that *'the design concept has been developed through a specific focus on the key viewpoints, agreed with the Planning Authority, to ensure a compatible scale for the given setting'*. The document identifies these viewpoints as a combination of viewpoints taken for the LVIA and by the project Architect.

4.6.2 Although an iterative design process is clearly applied in Chapter 4, its relation to the LVIA Assessment appears to be limited to that of the initial viewpoint locations. As the LVIA has evolved there does not appear to be a link between the findings of the Assessment and the design evolution. The LVIA appears to have been largely written once the preferred option was selected and no modifications have been made to the scheme in response thereafter. As a consequence, significant adverse effects persist.

#### 4.7 **Is it clear how the methodology was applied in the Assessment, e.g. consistent process, use of terms, clarity in reaching judgements and transparency of decision-making?**

4.7.1 The Initial Review took the view that the methodology concerning landscape and visual effects at Appendices 5.1 and 5.2 of the ES appeared to be sound overall. Nevertheless, further analysis in the Initial Review also noted that some information was missing or required clarification *'so that justification for the proposed sensitivity levels and values of receptors is fully established in order that it is clear how these have informed the predicted levels of effect.'*<sup>31</sup>

4.7.2 As a result, the Applicant has supplied additional information that does help to clarify their process of decision-making and this affords transparency; however, the application of their methodology is not always consistent.

4.7.3 The Regulation 25 Notice sets out a requirement for analysis of additional viewpoints, including consideration of the effects of the plume and construction *'using methodologies and analysis methods already employed'*. Appendix 5.6: Visual Effects has been updated to include consideration of the potential effects of the plume and construction; however, it has not been updated to include the additional SDNP viewpoints that are provided in the Regulation 25 response. The approach to the Assessment of viewpoints is not therefore consistent. The SDNP Viewpoints are referred to in the Regulation 25 response in the context of a narrative describing the experience along PRow within certain areas.

4.7.4 As already mentioned in this review at paragraph 4.13, I maintain my concern that the Assessment describes the magnitude of change and levels of effect on landscape character in the context of county wide landscape character areas, but the magnitude and levels of effects on district and local area characteristics (including the individual elements that combine to make up the landscape character) are not comprehensively taken into account.

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<sup>31</sup> Para 2.5, page 5 Initial Review, Indigo Landscape Architects, 2911 2020

This does not accord with GLVIA3,<sup>32</sup> the Assessment's methodology, and its definitions and thresholds relating to the extent of magnitude.

#### 4.8 **How appropriate are the viewpoints that have been used?**

4.8.1 This section takes into account the additional, supportive PRow narrative provided by the applicant.

4.8.2 Due to the findings of the Initial Review and consultation responses, the Regulation 25 request sets out a requirement for additional viewpoints in relation to:

- SDNP
- Provision of winter views were original photomontage still shows vegetative cover
- Additional locations elsewhere

4.8.3 The Applicant has provided this information as per their Regulation 25 submission and clearly explains why any requested viewpoints have been scoped out, and this is acceptable.

4.8.4 Due to the time of year and poor visibility at the time of photography (the difficulty in obtaining suitable photographs at this time of year is appreciated) a number of photo viewpoints appear overexposed and hazy which therefore do not present the worst-case scenario and make it difficult to appreciate the baseline conditions and potential effects of the proposed development. They are therefore not acceptable. These photo viewpoints are VP4, 8, 25, 26, SDNP VP7 and 8, including some of the photographic evidence provided in support of the PRow narrative.

4.8.5 Otherwise, the existing and submitted additional viewpoints are appropriate and accord with GLVIA3,<sup>33</sup> the Assessment's Visualisation Methodology in Appendix 5.2, and the requirements of the Regulation 25 request. For consistency and transparency of the application of the visual methodology the updated appendix 5.6 should include an Assessment of the additional SDNP viewpoints.

4.8.6 As requested, the additional detailed narrative relating to sequential views along PRow within 2 kilometres is extensive and useful to supplement the viewpoints and aid understanding of the likely overall visual experience along PRow, rather than at one location. It is noted that the Applicant extends their PRow narrative further than two kilometres in respect of the SDNP and this is useful to supporting the additional SDNP photoviewpoints provided. As additional significant effects have been identified following the completion and submission of the additional information, it would have been useful as part of an iterative assessment process, to extend the narrative beyond 2 kilometres where this has not been done.

4.8.7 In relation to the above and in terms of the areas represented by viewpoints it has become apparent that the area to the south west of Bentley and south of Lower Froyle that include

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<sup>32</sup> Pages 77 to 80, Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) prepared jointly by the landscape Institute and the Institute of Environmental Management and Assessment and published on the 17th April 2013

<sup>33</sup> Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) prepared jointly by the landscape Institute and the Institute of Environmental Management and Assessment and published on the 17th April 2013.

Saint Swithun's Way appears under-represented. As the area is only represented by Photoviewpoint 4 it is difficult to judge the extent of the visual effects in this area. Nevertheless, in my view, the proposal is likely to be visible; firstly, as the DTM ZTV indicates substantial areas of intervisibility with the proposed development; and secondly due to the landscape character in this area. The EHDC Landscape Capacity Study notes that to the north of Islington, hedgerow field boundaries are noticeably absent affording views along the Valley and also notes that the open fields to the south west of Bentley afford significant views.<sup>34</sup>

#### 4.8.8 SDNP and its setting

4.8.9 The SDNP state that *'whilst we do not wholly support the conclusions that the scheme's visual impact from public vantage points within the National Park isn't harmful it is reasonably comprehensive to this extent it does address our previous specific concerns about the lack of Assessment of views'*.<sup>35</sup>

4.8.10 The additional SDNP viewpoints including the updated winter views facilitate greater understanding and appreciation of the nature of the intervisibility that exists between the SDNP, its setting and the proposed development. Significant visual effects are identified at areas around:

- Binstead,
- River Hill Farm to Stubbs Farm (including PRoW east of Hay Place, west of Wheatley and between Hoggatts and Stubbs Farm ,SDNP VP2)
- Public footpath above South Hay House (SDNP VP 1 is representative).

4.8.11 It is clear, however, as illustrated by viewpoints 6, 10 and 11 that the edge of the SDNP has high visual sensitivity due to the nature of the topography in this area (bench formation) which affords elevated predominantly rural views across the adjacent landscape and Wey Valley to the hillsides to the North of the Wey Valley. It is noted that views from this area contain very little built form and the A31 is barely noticeable both visually and audibly.

4.8.12 Overall this review has found it difficult to find the information in the Regulation 25 response relating to the specific SDNP viewpoints within the narrative. This is due to their interchangeably being referred to by their number or their Figure reference. This has required a great deal of cross-checking. Some have a breakdown of the effects in order to understand how the levels of effects are reached (e.g SDNP VP1) and others do not (e.g SDNP VP2a). Altogether this is not a consistent approach and in line with the Assessment's Methodology and Regulation 25 request.

4.8.13 Paragraph 2.2.7 of the Regulation 25 submission states *'there will be limited visibility of the proposed development from footpaths between Binstead and River Hill Farm and as such the potential for significant visual effects and impacts on the setting of the SDNP is limited'*. Whilst the visual effects are not extensive within the SDNP they still occur irrespective of the scale of the SDNP. Their limited extent should not as the Assessment implies, detract from the importance of any identified effects in that location. Incremental change, regardless of the

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<sup>34</sup> Pages 9 and 10, East Hampshire District Council Landscape Capacity Study, Terra Firma Consultancy Limited 2018

<sup>35</sup> SDNP – Neighbouring Authority Consultation 15th Feb 2021

scale can contribute to a cumulative and gradual erosion of the integrity of the SDNP and its setting.

4.8.14 The PRow narrative that includes the SDNP viewpoints is confusing to follow and lacks clarity in its description of effects and does not clearly set out whether it is referring to the effects within the SDNP or the effects on its setting.

4.9 **How appropriate is the proposed mitigation, both measures incorporated into the scheme design and those identified to mitigate further the effects of the scheme, and mechanisms for delivering the mitigation?**

4.9.1 Having reviewed the submissions my findings concur with the following statements received from the HCC Landscape Team in their consultation response to the Regulation 25 submission<sup>36</sup> as quoted below:

4.9.2 *'The application accepts that the scale of the building makes it difficult to conceal within this landscape and much work has been undertaken to attempt to integrate the proposed development into its surroundings, through the design of the main building structure. It is clear from the Design Evolution Documents 1 and 2, that great amount of consideration has been put towards visually reducing the impact of the building bulk (height, width and length) by breaking up rooflines and adding texture and pattern to the facades so that they are varied, and by providing green walls on the facades that are predominantly below the skyline and white/grey for facades that will be viewed predominantly above the skyline. It is an interesting, innovative and striking building. That the green walls could display seasonal changes in colour could also be useful in helping the building integrate with the landscape at different times of the year. The Applicant demonstrates experience of managing green walls of this scale, through the example of Veolia Leeds RERF (literature provided with 14 December additional information), although the sustainability of high volumes of water for irrigation required during dry weather is questioned, and the exact specification for plant species for this site is still to be determined. An estimated 9360 litres of water per day in High Summer to irrigate the walls, is the equivalent of 21 times a four-person household consumption (when a typical four-person household consumption is 438 litres per day)....'*

4.9.3 *'To manage the bulk of the building, the design proposals have needed to borrow features of landscape character areas found in the adjacent landscape character area of the East Hampshire Hangars and landscapes further east in the South Downs, rather than the specific landscape valley character within which the site actually sits. White/grey cliffs, chalk escarpments and strongly undulating hills, are not features of this river valley landscape, and to that end the building does not sit within the landscape as though it 'belongs' here. It represents a different landscape and as such is an incongruous form of development. This landscape Assessment considers that the main building (housing the boiler house, turbine hall and tipping hall) of the proposed development, at approximately 40m by height by 165m length and 75m width, is too bulky and too visually dominant to be able to successfully integrate within this rural and low-lying river valley setting and therefore has an adverse effect on the surrounding landscape, both in terms of impact on landscape character and impact on views. The 80m stacks are also significant features that break the flow of this gentle valley landscape. The comments from our previous*

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<sup>36</sup> Para's 4.1 & 4.2, page 6 Landscape Planning Advice note for HCC dated 21/02/2021

*response still stand “it is considered that these changes (since initial scoping) are unable to overcome the fact that the layout, form and appearance of the development proposals as currently proposed are not appropriate to the scale and landscape setting of the site”.*

- 4.9.4 In relation to this I also have concerns that from numerous locations within the Study Area the Assessment relies on the presence of intervening vegetation to screen views of the proposed development, the existence of which is out of the Applicant’s control. Whilst this is entirely normal, and I appreciate that the application has to be assessed based on the existing baseline, due to the scale of the proposal, I think it is important to bear this element in mind particularly as the removal of vegetation is cited as a threat in relation to 3F:Wey Valley.<sup>37</sup>
- 4.9.5 In relation to the landscape layout and planting design the landscape proposals include retention of the existing tree cover around the perimeter of the site, planting of new native trees and hedges, new species-rich grassland, and new wet grassland and marginal planting within the proposed drainage pond. Whilst this does afford some benefits, I am inclined to agree with the response of the HCC Landscape Team that states *‘Existing tree cover within the site could not be replaced on a like for like basis, due to the reduced areas available. In addition, new planting would take time to provide the same level of screening as the trees removed. Due to the constrained nature of the site, the size of the building works, and the proximity to the railway line on the Eastern boundary, planting options are limited. The building and hard surfacing proposed have increased their footprint making it difficult to achieve much in the way of additional screen planting to soften the impact of the building. Offsite mitigation planting, to reduce the impact of the development proposals from key views is not proposed’*<sup>38</sup>. Furthermore, the Applicant has no control of the future maintenance and management of the screen planting along the boundary of the A31, (or other surrounding vegetation) as it is within the ownership of others.
- 4.9.6 Embedded mitigation is described on page 25 of the ES Chapter 5 where this was included at the design stage of the proposal. Following the identification of landscape and visual effects and those that are judged to be significant adverse, there has been no further mitigation proposed to ameliorate these effects nor any explanation as to why not. This does not follow guidance contained in GLVIA3.<sup>39</sup>
- 4.9.7 Evidence for consideration of alternative locations
- 4.9.8 East Hampshire District Council note in their consultation response<sup>40</sup> that the site was chosen as it was already owned by the Applicant and there has been no consideration of alternatives. The Applicant has verified that this is the case.<sup>41</sup>
- 4.9.9 According to GLVIA3 this approach is valid as it states *‘it is not a requirement that alternatives should be identified and considered’*. However GLVIA3 caveats this by adding *‘it is*

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<sup>37</sup> Page 11 Hampshire Integrated Character Assessment -3F Wey Valley. Hampshire County Council 2015

<sup>38</sup> Paragraph 5.1, Page 6 Landscape Planning Advice note for HCC dated 21/02/2021

<sup>39</sup> Paragraph 4.23, page 59, GLVIA3

<sup>40</sup> Page 5 East Hampshire District Council consultation response dated 21<sup>st</sup> August 2020

<sup>41</sup> Environmental Statement Volume Five Additional Environmental Information Dec 2020

considered that there should be, [sic] as a means of achieving potentially more sustainable development'.<sup>42</sup>

- 4.10 **What is the reviewer's opinion of the consistency and objectivity in application of the criteria and thresholds set out in the methodology for assessing the sensitivity of receptors, the magnitude of changes arising from the project, the degree/nature of effects, and the approach to judging the significance of the effects identified, in the case of EIA projects?**
- 4.10.1 Extent of effects
- 4.10.2 The Assessment's Methodology at Appendix 5:1 describes in Table 2.2 the magnitude of landscape effects in relation to *inter alia*, a hierarchy of geographical extents. However the assessment only applies this to Character Areas. Geographical extents do not apply to Character Areas but the extent to which an effect is felt across the landscape.
- 4.10.3 Landscape character appraisals and capacity studies.
- 4.10.4 ES Chapter 5 describes the key characteristics of the county and district appraisals and includes a selective commentary on some of the key landscape and visual sensitivities and landscape strategies and guidelines, but not all.
- 4.10.5 In relation to the EHDC Capacity Study, Appendix 5.5 refers only to the assigned values in the Capacity Study, but not its assigned sensitivities. Some relevant specific local landscape and visual sensitivities have therefore been overlooked that would undermine the Applicant's own judgements and justifications.
- 4.10.6 SDNP Viewpoints
- 4.10.7 As mentioned previously in this review there is an inconsistent approach to the Assessment of the SDNP viewpoints where they are not included in the updated Appendix 5.6.
- 4.10.8 Residential Visual Amenity
- 4.10.9 As Matters of Clarification the Applicant has provided further information regarding the potential effects on occupants at residential properties, with a detailed search extending to 1 km, where 5 potentially significant effects are identified.
- 4.10.10 The Applicant states in Matters of Clarification report, paragraph 10.1.6, that in accordance with the LI Technical Note 'a key factor to determining if the RVA threshold has been reached is whether the development would be overwhelming / overbearing for tall structures'. The Applicant provides a plan with the properties (identified with numbers) up to 1 km with DTM ZTV overlaid at Figure 11.
- 4.10.11 The Applicant applies this test and a description of the potential effects on these properties is provided in paragraphs 5.5.56 to 5.5.62 of the ES Chapter 5. As the Applicant has not

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<sup>42</sup> Para 4.11, page 53, GLVIA3

been requested to provide a detailed RVAA (normally the subject of appeal unless specifically requested by the Planning Authority at Scoping) then this approach is acceptable. It is however difficult to verify their findings without carrying out a visit to each property and without a detailed plan view of each property with DTM ZTV overlaid. Given the close proximity of existing properties in relation to the scale of the development within the 1km radius, I am not fully convinced as to the level of effects on the visual amenity of occupants and an RVAA would help to ascertain this.

- 4.10.12 It is entirely appropriate that the total number of significant (and other) visual effects is borne in mind in terms of identifying the number and nature of visual receptors likely to be affected and that includes the views of occupants of properties, even if they are not subject to the test of the RVA threshold of 'overwhelming or overbearing'. Furthermore, as significant visual effects occur on users of PRoW beyond one kilometre it is likely that this would also apply to residential properties beyond 1km and there is therefore a case to extend the assessment of properties in this regard.
- 4.11 **What is the opinion on the volume, relevance and completeness of the information provided about the development or project including, where relevant, detail about various development stages such as construction, operation, decommissioning, restoration etc?**
- 4.11.1 Following submission of a high volume of further information in relation to the Regulation 25 request and Matters of Clarification, this information is sufficient to inform the review, and to identify the nature and extent of likely effects and matters of disagreement, including the identification of any areas that would benefit from further analysis and clarification.
- 4.12 **Does the document clearly identify landscape and visual effects which need to be considered in the Assessment?**
- 4.12.1 The Regulation 25 and clarification documentation submission has enabled a greater understanding of the nature and extent of the potential landscape and visual effects, although finding the predicted levels of effects within the documentation has been difficult as they are not all listed in one place consistently or summarised.
- 4.12.2 The Applicant has therefore supplied, in response to a request during the review process a Summary of Landscape and Visual effects (May 2021).
- 4.12.3 There are some areas that would still benefit from further analysis such as landscape character, local studies, the setting of the SDNP, assessment of minor lanes / cycle routes, residential properties and areas that are under-represented with viewpoints or narrative.

**4.13 Have levels of effect been clearly defined and, in the case of LVIA, have thresholds for significance been clearly defined and have cumulative landscape and visual effects been addressed?**

4.13.1 As already noted in this review levels of effect are not clearly defined in parts of the Assessment or set out in one place and are therefore difficult to find within the Assessment. The Applicant has therefore provided a list of all the levels of effects for all the receptors identified within the baseline of the Assessment via a Summary List (May 2021)<sup>43</sup>.

4.13.2 Thresholds for significant effects

4.13.3 The Assessment's Methodology at Appendix 5.1 (para. 4.6) states that '*The judgement for this particular assessment is that greater than moderate effects are more likely to be significant*' and '*This does not preclude a moderate effect or lower being significant or a greater than moderate effect not being significant. This judgement will depend on the specific circumstances being considered*'. I cannot see that this consideration/judgement has been made for the effects that are described as 'moderate' or below. In relation to the following points and those made earlier in this review I have concerns that effects that are assessed as moderate could therefore be considered significant.

4.13.4 Extent of effects and terminology

4.13.5 The Assessment often uses the terms 'localised', 'limited' and 'isolated' in its reference to the magnitude of effects and the extent of significant effects on landscape character. This terminology can (and has been used to) downplay the ascribed significance of the effects. As an example, the approach to the assessment of Character Areas demonstrates this, where the description of the effects are described in the context of county areas and are therefore downplayed and deemed to be 'localised' and/ or 'limited'.

4.13.6 The Applicant's approach to the assessment of Magnitude also applies to the assessment of Significance. Any significant effect that is described as "*relatively localised*" is thereby minimised.

4.13.7 The Applicant provides a conclusion within their response to the Regulation 25 request that maintains at paragraph 7.1.6 that their statement in their original conclusion still stands: '*significant landscape visual effects would occur up to 1.5 kilometres from the site with some significant visual effects extending beyond this distance at some isolated elevated viewpoints*'. The Applicant also states that this '*has been confirmed by additional fieldwork in response to consultee comments*'.

4.13.8 I question this conclusion, as it is clear that significant effects will evidently extend beyond 1.5 kilometres and I would not consider these to be 'isolated'. This is illustrated by the extent of visibility and variety of visual receptors (users of PRoW, lanes and settlement) that would experience effects around Viewpoints 6 and 10 and PRoW North of Malms House, that are located on the SDNP boundary. The Concise Oxford English Dictionary defines

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<sup>43</sup> 2627-01 / Alton Advanced Energy Recovery Facility - Summary Of Landscape And Visual Effects-May 2021

'isolated' as 'Remote, lonely, single, exceptional'. I would not consider these receptors to fit any of these descriptions.

4.13.9 In relation to County area 3F: Wey Valley, the Applicant concludes at para 5.8.4: *'In the wider context, the combination of vegetation cover and landform is such that the extent over which the proposed development would influence landscape character would be limited, and underlying existing characteristics would remain dominant'*. I cannot agree with this conclusion. In my opinion, underlying landscape character effects would be appreciable. For example, the proposal will significantly affect visual tranquillity from St Swithun's Way. I would also consider that the scale of the proposal would evidently detract from one's appreciation of key characteristics such as the *'distinct flat valley'* landform as the proposal would be out of scale with the small scale valley characteristics in which it sits.

#### 4.13.10 Capacity, scale and nature of the proposal

4.13.11 In relation to the Assessment of levels of effects and defining thresholds of significance, the capacity of the landscape to accommodate a proposal of this nature should be ascertained through judgements of susceptibility. I have concerns that this has not been addressed.

4.13.12 The ES LVIA Assessment overlooks some very important observations in the EHDC Capacity Study such as the conclusions and recommendations in relation to 4b.1 and 4b.2: Alton to Bentley which states on pages 13-14 that the area has a *'medium to low capacity, constrained by a strong rural character and its role as an integral part of the Wey Valley landscape and rural setting of Alton, Hollybourne, the Froyles and Bentley and their Conservation Areas. There are important views from Conservation Areas and public footpaths, including St Swithun's Way, and offers views across the Wey Valley to the SDNP from the downs to the North. The area has a clear sense of history and contains characteristics typical of the nearby SDNP. It is possible that a very small amount of development could be accommodated within or around existing settlements or clusters of built form or building conversions provided it is informed by further landscape and visual impact assessment and sensitively integrated into the landscape, respecting the historic settlement pattern and local distinctiveness, although great care would need to be taken to avoid any landscape or visual harm. The area should otherwise remain undeveloped'*.

4.13.13 The scale and nature of the proposal would therefore be entirely incongruous with this observation and other conclusions reached within the Capacity Study. The Assessment has not objectively assessed the effects and stated what they are.

#### 4.13.14 Effects of the plume

4.13.15 The Applicant (as per the Regulation 25 request) has provided additional information regarding the potential effects of the plume in the form of detailed information in their clarification report, six winter photomontages, artists impressions and a precedent study at Four Ashes (see figures 9 a) – d) and 10 a) -f). This information is useful to understanding the potential effects of the plume when seen and it is clear that there would be intermittent effects.

- 4.13.16 The NWIG have translated the percentage of visibility ('8.8% and 13.55% of total daylight hours') provided by the Applicant into actual hours<sup>44</sup> and state that this would equate to one day per week or around 40 days per year. [One day per week would in fact equate to 52 days per year]. It would be useful to seek the Applicant's verification of these figures.
- 4.13.17 The Applicant states in ES Volume 1, Chapter 5, para 5.5.77 that '*Where the emissions plume is visible, this would have the potential to draw attention to the presence of the proposed development from the surrounding area, thereby increasing the influence of the new structures on the views available.*' The Assessment also subjectively refers to the appearance of the plume as 'infrequent' and this is misleading.
- 4.13.18 It is clear that this would cause intermittent (but regular) harm to the perceptual quality, i.e. tranquillity of the landscape in which it is experienced and what is considered to constitute the setting of the SDNP. It would cause intermittent (but regular) harm to visual receptors and their visual amenity. The additional effects of the plume have the potential to intermittently raise the levels of effects predicted and some borderline moderate effects could become significant in this respect.
- 4.13.19 Cumulative effects
- 4.13.20 The approach to the Assessment of Cumulative effects is not set out in Appendix 5.1 Methodology.
- 4.13.21 In terms of cumulative effects the Applicant's Clarification Report (page 25) provides further information and assessment of the potential for cumulative Landscape and Visual effects in relation to the Esso pipeline.
- 4.13.22 Whilst cumulative landscape and visual effects have therefore been addressed there are some discrepancies that require clarification, namely the location of clearance of vegetation for the Esso pipeline. Although the Applicant states in para 12.1.1 (Matters of Clarification) that '*there would not be any loss of important vegetation in the immediate vicinity of the site*', it is not clear where the 10m wide sections to be removed and the 6m easement are actually located and how this is likely to affect and impact on views from within the wider landscape setting.
- 4.13.23 SDNP
- 4.13.24 The portion of the SDNP that is within the Study Area and in proximity to the proposed development forms a spur of land and is relatively narrow (approximately 3 km) when compared to the rest of the SDNP. Incremental change occurring within its setting in combination with other developments is therefore likely to exert an influence on the SDNP and its Special Qualities. The SDNP state '*there is unlikely to be a widespread significant visual impact upon the national parks setting*'<sup>45</sup> and I agree with this statement. However, there would still be some significant visual impacts and just because they are not widespread, this does not mean that they would not be harmful to the setting and that there would be no

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<sup>44</sup> Section 4.5. Landscape Response. Terra Firma Consultancy Ltd – 4<sup>th</sup> Feb 2021

<sup>45</sup> Page 2 SDNP – Neighbouring Authority Consultation 15<sup>th</sup> Feb 2021

material effect. The following quote in relation to how development in the setting of National Parks should be dealt with is relevant:

- 4.13.25 *'Land within the setting of these areas often makes an important contribution to maintaining their natural beauty, and where poorly located or designed development can do significant harm. This is especially the case where long views from or to the designated landscape are identified as important, or where the landscape character of land within and adjoining the designated area is complementary. Development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account'.<sup>46</sup>*
- 4.13.26 Although ES Chapter 5 and Section 7 of the Regulation 25 response state *'there would be no material effect on the Statutory Purposes of the designation'*, an objective examination of the potential effects of the proposed development in relation to the SDNP Statutory Purposes is not provided (although this is not the purpose of LVIA).
- 4.13.27 It is evident that there is firstly intervisibility between the proposal and the SDNP, secondly an effect on receptors within the SDNP, and thirdly a clear effect on the setting of the SDNP.

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<sup>46</sup> <https://www.gov.uk/guidance/natural-environment>, para 42

## 5. **Step 3 – Critique of the presentation of the findings of the Assessment**

5.1.1 This section provides a review of the presentation of the findings of the statement in relation to the following criteria:

5.1.2

- **Does the LVIA/LVA display transparency, objectivity and clarity of thinking, appropriate and proportionate communication of all aspects of the Assessment of landscape and visual effects, including cumulative effects?**
- **Have the findings of the Assessment been clearly set out and are they readily understood?**
- **Has there been clear and comprehensive communication of the Assessment, in text, tables and illustrations?**
- **Are the graphics and/or visualisations effective in communicating the characteristics of the receiving landscape and visual effects of the proposals at agreed representative viewpoints?**
- **Are the graphics and/or visualisations fit for purpose and compliant with other relevant guidance and standards?**
- **Is there a clear and concise summation of the effects of the proposals?**

[The above criteria are taken from “Reviewing Landscape Visual Impact Assessments and Landscape and Visual Appraisals - Landscape Institute Technical Guidance Notes 1/20”(10 Jan 2020).They are grouped together due to the overlap between them.]

5.1.3 Submission of the Regulation 25 and Matters of Clarification information has increased the transparency of the findings of the Assessment by providing more evidence to substantiate or add to the number of levels of effects predicted in ES Chapter 5. This information includes a PRoW narrative, additional consideration of the effects on the SDNP and its setting, the visibility of the plume, effects during construction and lighting, not all of which are set out in an objective manner.

5.1.4 The presentation of the effects on landscape character and the setting of the SDNP could be more defined and detailed.

5.1.5 The visual information is comprehensive and detailed, although as referred to earlier in this review there are some inconsistencies in the Assessment’s coverage and presentation of visual effects.

5.1.6 The summation of the effects of the proposals is not clear and concise due to information being spread across many documents and embedded within narrative. In order to address this the Applicant has supplied (as requested during the review process) a summary list of the receptors and predicted Landscape and Visual effects.

5.1.7 In relation to Cumulative effects it would have been useful if a plan had been provided to show the exact location of the 10 metre wide sections of hedgerow proposed to be removed for the London to Southampton pipeline.

- 5.1.8 More detailed plans of the residential properties within 2km of the proposal and plans showing district and local character areas overlaid with DTM ZTV would have been useful for ease of reference, to provide transparency and verify the written part of the Assessment.
- 5.1.9 The additional information helps to clarify information in the original submission and as a result has identified additional significant effects and areas that would benefit from further analysis. The approach to setting out the information is not always consistent with the approach taken in the main ES Chapter 5 and associated Appendices. This therefore makes it difficult to find and compare information within the documentation.
- 5.1.10 Following the submission of the Regulation 25 response and Matters of Clarification information there is a comprehensive communication of the Assessment in text, tables and illustrations.
- 5.1.11 All the graphics are fit for purpose and comply with the Landscape Institute Technical Guidance and the Applicant's methodology. Overall, the graphics are effective in communicating potential landscape and visual effects and the additional information has helped to aid transparency of Assessment. On the other hand, whilst many of the visualisations are fit for purpose, some are not clear and/or too dark due to poor weather conditions.
- 5.1.12 The Matters of Clarification document has no summary, which would have been useful.
- 5.1.13 The conclusion within the Regulation 25 response makes it clear that following their additional submissions the conclusions of their original Assessment still stand and that the additional information is supportive in this regard; however, as set out below I do not agree with this conclusion.

## **6. Conclusions**

- 6.1.1 Following submission of the Regulation 25 and Matters of Clarification information I would consider there to be sufficient material to review the Assessment and to make a judgement concerning the likely effects including being able to clearly identify omissions or elements that requires further Assessment as part of an iterative process.
- 6.1.2 I take the view that the scale of the proposal is incongruous with the small scale characteristics of the Wey Valley in which it sits and that the proposed mitigation fails to mitigate the predicted Landscape and Visual effects. The number of significant effects identified has increased following the Regulation 25 and Matters of Clarification submission. The Applicant maintains that their original conclusion still stands. However, I cannot see that this is the case given the number of significant effects identified.
- 6.1.3 I cannot therefore agree with the conclusion.