

Review of Landscape and Visual Impacts by Michelle Bolger for CBWIN

1 INTRODUCTION

1.1 This statement has been prepared by The Landscape Partnership (TLP) on behalf of Cambridgeshire County Council (CCC) in relation to planning application S/3372/17/CW, in response to the Review of Landscape and Visual Impacts report prepared for CBWIN by Michelle Bolger Expert Landscape Consultancy (MB) (S/3372/17/CW), September 2018. This statement provides a brief overview of the main comments made by MB, TLP's response/comments and the main differences between MB (CBWIN's landscape consultant), AXIS (applicant's landscape consultant), and TLP (CCC's landscape consultant).

2 LVIA METHODOLOGY

2.1 Paragraph 4.1.2 of MB's Review advises that *'although the methodology generally accords with established best practice principles in GLIVA3'*, a number of aspects have been raised by MB regarding coverage and approach, which MB considers are the reasons for an underestimation of landscape and visual impacts in the LVIA. These are set out below:

- a. **Methodology Criteria:** there is agreement on most of the criteria used within the LVIA, with the exception that MB advise that 'Skyline' should have been included in relation to susceptibility of the landscape to change. TLP considered that, whilst horizontal skylines are a characteristic, the influence of skylines was covered under our comments relating to 'Scale', as quoted in para 6.5.3.
- b. **Study Area:** too small a study area was used. The Study Area to be used in the LVIA was set out in Amey's Environmental Statement (ES) Scoping Report, March 2017, which stated *'it is considered that if any significant landscape and visual effects would be experienced they would arise at relatively closer distances from the Proposed Development, most likely within 2.5km. Some elements of the Proposed Development would potentially be visible at longer-range, although it is less likely that this would give rise to significant effects upon either the landscape or upon views. Nonetheless, the study area has been extended to capture more sensitive receptors within approximately 5km, and viewpoints on the ridge to the north approximately 6.5km away'* (para 6.2.1). Within CCC's Scoping Opinion letter of 29 June 2017, it stated *'paragraph 6.2.1 of the Scoping Report - the basis of the study area is accepted'*. Accordingly, the LVIA was undertaken in accordance with the Scoping Opinion. Whilst TLP were not involved in the scoping of the EIA, we consider the extent of the Study Area was reasonable, and if it had been extended, it would not be expected to identify any further significant effects or materially change information that is already known.
- c. **Zone of Theoretical Visibility (ZTV):** as MB advises (4.6.3), a ZTV is often the first step in defining a study area. This was not provided in Amey's ES Scoping Report, nor did they advise a ZTV would be undertaken in the LVIA. This was also not requested within CCC's Scoping Opinion.

A ZTV is recommended within GLVIA3, but it is not a mandatory requirement. If the LVIA was required to include a ZTV, we would have expected to have been 'scoped in' as part of the Scoping Opinion. Accordingly, we considered that the LVIA was undertaken in accordance with the Scoping Opinion. Whilst the preparation of a ZTV would have been helpful, the LVIA provides a sufficiently detailed assessment of receptors, that the effects can be effectively understood based on its content.

d. **Viewpoint and Photomontage Selection:** MB advises that insufficient viewpoints were assessed. TLP was not involved in the selection of viewpoints and photomontage selection, so information was submitted on the basis of the content in the Scoping Opinion. Sixteen viewpoints were identified within Amey's ES Scoping Report, with CCC's Scoping Opinion requesting additional viewpoints within the proposed Waterbeach development, as well as additional viewpoints that were being explored by South Cambridgeshire District Council (SCDC). The agreed outcome of these discussions was to be reflected in the Environmental Impact Assessment (EIA) and ES. A further request was provided by Historic England / Denny Abbey Trust. An additional four viewpoints were added and ten omitted. Of these ten, MB disagrees with the omission of four of the viewpoints (Vp 4, Vp 18, Vp 23, Vp 29). TLP agree with the reasoning for the omission of these viewpoints within the LVIA, based on ES Appendix 5.3. This is briefly as follows:

- Vp 4 Public Footpath, Fruit Farm (source AXIS) is from a public footpath to the west of the A10, whereas Vp 11 is to the east of the A10 on the same side of most of Chittering, which it seeks to represent;
- Vp 18 Denny Abbey (requested by Historic England), whilst it is accepted that there may be a heritage reason for including this viewpoint, from a landscape and visual perspective, it was considered the effects on receptors visiting Denny Abbey could be adequately understood from Vp 17;
- Vp 23 Waterbeach Barracks (requested by SCDC), there is a difference of opinion to how similar this would have been to Vp 24, although this is primarily a concern regarding the location of the visual receptor in the proposed development and whether this is flanked by proposed buildings or open space. Nevertheless, Vp 24 is sufficiently close to the proposed open space, that this can be correlated and understood from Vp 24, so long as it is understood that the visual receptor is within the open space;
- Vp 29 Ely Cathedral (request from Historic England), with the LVIA advising there were not public views readily available, and that Ely Cathedral is approximately 12.5kms from the proposed development. At such a distance TLP consider the proposed development was very unlikely to have a significant adverse effect on views.
- Comment was also made by MB that views from the A10 were under-represented, which we consider is a valid point, but no additional viewpoints were requested from the A10 at the scoping stage. However, this is a low sensitivity route, and therefore unlikely to result in

widespread significant effects (see below). Likewise, regarding a viewpoint from American War Cemetery at Madingley (c 12km to the south-west). No details were provided in the Scoping Opinion or details of discussions with SCDC regarding which viewpoints should be photomontages. Nevertheless, TLP consider that the viewpoints included provided within the LVIA are sufficient to understand the likely significant effects of the proposed development on visual receptors which is the purpose of EIA's as confirmed by para 1.17 of GLVIA3.

- e. **Photomontage Methodology and Presentation:** MB advised regarding a lack of availability of a methodology and concerns regarding presentation of the photomontages. TLP requested that AXIS provide their Photomontage Methodology, as part of our Landscape Review. This was duly provided as the Visualisation Methodology by Jon Mason at AXIS on 9 February 2018, but was not uploaded to CCC's website. This has now been rectified, and the methodology has also been forwarded to MB by Emma Fitch on 11 September 2018. MB subsequently has submitted an Addendum to the Review of Landscape and Visual Impacts, dealing with the methodology. As MB advises in their Review *'there is no definitive guidance on how visualisations should be presented except for guidance on visualisations for windfarms in Scotland... whilst this guidance is not directly applicable to England or to other forms of development it is helpful in establishing the principles for preparing visualisations that give an accurate sense of scale and distance'* (para 4.9.1). The main applicable guidance at the time of the preparation of the photomontages in relation to the site and proposed development is the 'Landscape Institute Advice Note 01/11, Photography and Photomontage in Landscape and Visual Impact Assessment' and 'Landscape Institute's Technical Guidance Note 02/17, Visual Representation of Development Proposals. The Scottish Natural Heritage Visual Representation of Wind Farms: Version 2.2, 2017 does provide helpful guidance (and noted as good practice in AXIS's methodology). The LI's Technical Guidance Note 02/17 advises *'such guidance has a particular scope and purpose and, as recognised by the Landscape Institute, may also be helpful in other situations, but it should not be regarded as setting a minimum or recommended standard for all situations'*. The new LI's Public Consultation Draft of Photography and Photomontage in Landscape and Visual Impact Assessment, 2018-06-01 will help establish best practice for the preparation of the photomontages for all types of developments in the UK, but this still in the process being completed, and the consultation draft was not available at the time of the photomontage preparation. There is no mandatory requirement for Scottish Natural Heritage Visual Representation of Wind Farms: Version 2.2 to be followed, and if it was it should have been agreed at the scoping stage. The current LI Advice Note 01/11 states *'the correct viewing distance should be stated for all printed or digitally displayed photographs and photomontages, together with the size at which they should be printed'*. TLP did ask AXIS within our Landscape Review what size the photomontages should be printed at and the appropriate viewing distance that should be used in order to represent the correct scale of the proposed development. AXIS's Visualisation Methodology advises that they should be printed at A3, with a recommended viewing distance of 300mm and the printed sheet curved at an angle that reflects the Field of View (typically 63 degrees). The methodology also advises that this is both difficult and

impractical, and as such it is recommended that the printed images are held flat at a comfortable arm's length. It may well have been helpful for the applicant to have also made available the photomontages as a single frame image at A3 size as suggested by MB to provide a more comfortable viewing distance and a relatively larger scale representation of the view. However, this was not requested from the applicant by CCC, SCDC or TLP. Nevertheless, it is still possible to appreciate the relative scale of the proposed development within the view, by viewing the images in the field and using reference features in the view to appreciate location and scale. TLP were able to make their professional assessment about the relative magnitude and significance of effects from the images provided in the LVIA

- f. **Winter View Photomontages:** MB notes that the simulated poplar trees shown in photomontages (most notably Vps 17 & 20) are in full leaf and therefore not worse-case scenario. The proposed trees reflect the time of year the photographs were taken, when the existing trees were in leaf. Whilst it is the preferred option to have the photomontage represented in winter, AXIS have advised that whilst the proposed trees would achieve some beneficial effects in terms of screening the impacts of built development, they do not consider that these benefits would be sufficient to alter the residual effects defined in Year 0 e.g. Vp 17 and Vp20 where a significant effect identified in the LVIA. Consequently, even if shown in winter, the outcome would still have been the same in terms of assessed effect.

3 LANDSCAPE EFFECTS

- 3.1 MB's Review advises that the site '*lies in a slight basin*' (para 6.3.4) which features the two main river corridors of the River Cam and the River Great Ouse. The 'river basin' is described as being formed by the more elevated chalklands (the chalk ridge is approximately 15kms from the site) and claylands to the south, south-west and south-east, and together with Haddenham Ridge (approximately 6kms from the site) and a lower ridge, define the edge of the basin to the north-west and north-east.
- 3.2 MB agrees with the LVIA that the site and immediate setting has a medium value. However, MB disagrees with this for the landscape beyond the immediate setting, advising that the wider landscape, particularly as it relates to the 'basin landscape' and the land to the north of the site up to Haddenham Ridge has a medium-high value, as well as medium-high susceptibility to change and thus medium-high sensitivity. In TLP's opinion the 'basin landscape' covers a very large geographical area and appears to include a mixture of LCAs i.e. at the county scale part of the Fenlands LCA, but also the Western Claylands LCA. Defining the site and immediate setting, as separate from the wider surrounding 'basin landscape' which combines a number of character areas is a different approach to that taken by the LVIA, which makes comparisons more difficult. TLP's view is that the overall wider surrounding landscape, beyond the immediate setting of the site, includes a mixture of higher and lower sensitivity features and characteristics, and overall a medium sensitivity to the surrounding wider landscape is an appropriate judgement. The magnitude of change on the surrounding landscape is described by MB as being large adverse, resulting in a moderate/major adverse significance of effect, and therefore significant, extending over a wider geographical area than identified in either the LVIA or the TLP review. The

extent of this geographical area where there would be a significant effect is not defined by MB, so again a direct comparison is more difficult. We consider it reasonable to define the differences between the landscape consultants, as set out in Table 3.1 below (green indicates where there is agreement that there is significant adverse effect). Consequently, there is agreement between all the consultants that there would be a significant adverse effect on landscape character up to 1.5kms.

Table 3.1: Summary of Judgements

Effects	Distance	Significant effect?			Assessment of Significance of Effect
		TLP	AXIS	MB	
Claylands	Effects up to 1.5kms	Yes	Yes	Yes	Moderate to Major Adverse
Claylands	Effects between 1.5-2.5kms	Yes	No	Yes	TLP and MB find Moderate to Major adverse – Axis find that the effects are more generally Minor adverse
Claylands	Effects beyond 2.5kms	No	No	Yes	MB find Moderate to Major adverse to an undefined limit
Fenlands	Effects up to 1.5kms	Yes	Yes	Yes	Moderate to Major Adverse
Fenlands	Effects between 1.5-2.5kms	Yes	No	Yes	TLP and MB find Moderate to Major adverse – Axis find that the effects are more generally Minor adverse
Fenlands	Effects beyond 2.5kms	No	No	Yes	MB find Moderate to Major adverse to an undefined limit, but particularly up to Haddenham Ridge (6kms)

4 VISUAL EFFECTS

4.1 MB advises that there are *‘only a limited number of viewpoints and issues are considered where it is felt the LVIA most underestimated the impact’*. There is agreement between MB and TLP and the LVIA that there would be a significant adverse effect on the receptors visiting Denny Abbey (Vp 17 and Vp 20) and from the A10/Denny Cottages (Vp 1). MB and TLP also agree with TLP that there would be additional significant effects on visual receptors represented by Vp 6, Vp 7, Vp 10, and Vp 24. MB also identifies two further key receptors that would experience significant adverse effects, that of the road users along the A10, and residents and road users on Haddenham Ridge. MB advises that A10 road users are not sufficiently represented, which we agree is a reasonable judgement, and thus Vp 1 is the only representative viewpoint (where there is common agreement that there would be a significant adverse effect). MB advises that particularly between Cambridge Research Park (driving north) and Chittering (driving south) there would be a large magnitude of change on a low/medium sensitivity receptor resulting in a moderate/major adverse significance of effect. However, it should be noted that this is a busy A road, with vehicles travelling at speed, with fleeting views, in which views to the west of the A10 between Cambridge Research Park and Chittering have already been affected by built development and landfill. Whilst there would clearly be an adverse effect on these views, TLP do not consider them to be significant, other than on leaving Denny Abbey and joining the A10 i.e. Vp 1, where the viewer is directly facing the proposed development. With regard to the views from Haddenham Ridge (Vp 15 and Vp 16), MB advises that there would be a medium magnitude change on a high sensitive receptor, resulting in a moderate/major significance of effect. This is due to the proposed development forming a new industrial landmark within the panorama, that would break the skyline, and have a vertical prominence

above the surroundings. TLP largely agree with this description, but consider at a distance of over 6kms this would be a comparatively small scale feature on the horizon, experienced in a much wider horizontal panorama, and thereby would be a change affecting a small proportion of the view. Whilst the views would be adversely affected, TLP consider the LVIA's judgement of moderate adverse significance provides an accurate assessment of effect, and that this is not significant.

4.2 The differences in judgement between the landscape consultants are summarised in Table 4.1 (green indicates where there is agreement that there is significant adverse effect).

Table 4.1: Summary of Judgements Regarding Visual Effects

Effects	Distance	Significant effect?			Assessment of Significance of Effect
		TLP	AXIS	MB	
VP 1	140m	Yes	Yes	Yes	TLP find Major adverse – AXIS Moderate to Major adverse
VP 3	870m	No	No	No	Moderate adverse
VP 5	2050m	No	No	No	Moderate adverse
VP 6	1740m	Yes	No	Yes	TLP find Moderate to Major adverse – AXIS Moderate adverse
VP 7	1780m	Yes	No	Yes	TLP find Moderate to Major adverse – AXIS Moderate adverse
VP 8	1130m	No	No	No	Minor adverse
VP 9	1500m	No	No	No	Moderate adverse
VP 10	2150m	Yes	No	Yes	TLP find Moderate to Major adverse – AXIS Minor to Moderate adverse
VP 11	1620m	No	No	No	TLP find Minor to Moderate adverse – AXIS Minor adverse
VP 12	3210m	No	No	No	Minor adverse
VP 13	3640m	No	No	No	Minor adverse
VP 14	5520m	No	No	No	Minor adverse
VP 15	6330m	No	No	Yes	AXIS & TLP find Moderate adverse , MB find Moderate/Major Adverse
VP 16	6180m	No	No	Yes	AXIS & TLP find Moderate adverse , MB find Moderate/Major Adverse
VP 17	530m	Yes	Yes	Yes	Major adverse
VP 20	700m	Yes	Yes	Yes	TLP find Major adverse – AXIS Moderate to Major adverse
VP 22	2080m	No	No	No	Minor adverse
VP 24	1130m	Yes	No	Yes	TLP find Moderate to Major adverse – AXIS Moderate adverse
VP 25	3030m	No	No	No	TLP find Moderate adverse – AXIS Minor to Moderate adverse
VP 26	5040m	No	No	No	TLP find Moderate adverse – AXIS Minor adverse

5 CONCLUSION

5.1 MB has advised that there are a number of omissions from the LVIA, which would have helped to better understand the effects of the proposed developments, which in MB's opinion would have led to an under estimation of the landscape and visual impacts. We consider that a number of these recommendations are reasonable, but should have been agreed at the scoping stage. Furthermore, none of the recommendations are mandatory requirements. Nevertheless, TLP do not consider, the absence of the additional information requested has led to underestimating the effects. Appropriate judgements can be made on the information submitted.

5.2 There are nevertheless differences of judgement as to what the impacts of the proposed development would be on landscape and views, between the different landscape consultants. This commonly occurs, as the assessment of landscape and visual effects involves an element of subjectivity. However, there is common agreement between the consultants that the proposed development would result in significant adverse effects on the landscape, up to a distance of 1.5kms, and on receptors visiting Denny Abbey, namely Viewpoints 1, 17 and 20.