
Application Ref: WA/2023/00294

PINS Ref: APP/R3650/W/23/3326412

**LAND CENTRED COORDINATES 505938 138328
LAND EAST OF KNOWLE LANE,
CRANLEIGH,
SURREY
GU6 8JN**

**REBUTTAL PROOF OF EVIDENCE
OF DAVID WILLIAMS**

**ON BEHALF OF
GLEESON LAND LTD**

NOVEMBER 2023

**Appeal Pursuant to Section 78 (2) of the
Town and Country Planning Act 1990**

**APPEAL BY GLEESON LAND LTD
AGAINST THE REFUSAL OF
PLANNING PERMISSION BY
WAVERLEY BOROUGH COUNCIL
IN RELATION TO PLANNING APPLICATION
WA/2023/00294
ON**

**LAND CENTRED COORDINATES 505938 138328
LAND EAST OF KNOWLE LANE,
CORANLEIGH,
SURREY
GU6 8JN**

**Landscape Rebuttal Proof of Evidence
Of
David Williams, BA (Hons), Dip (Hons) LA, MLI.**

of

**David Williams Landscape Consultancy Ltd
Dyers,
East Putford,
Holsworthy,
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EX22 7UG**

PINS Ref: APP/R3650/W/23/3326412

DWLC Ref: 0350/A4/L5/DHW

Date of Hearing / Inquiry: 21st November 2023

Date of Document: 4th November 2023

1.0 INTRODUCTION

- 1.1 My name is David Hugh Williams. Full details of my qualifications and experience are contained in my main Proof of Evidence (**1/5a**). This Rebuttal Proof of Evidence has been prepared in response to the evidence of Michelle Bolger of Michelle Bolger Expert Landscape Consultancy (**CD 1/4a**), the landscape witness acting on behalf of Waverley Borough Council.
- 1.2 This is not intended to be an exhaustive rebuttal and this document only deals with certain points where it is considered appropriate and helpful to respond in writing at this stage. Where a specific point has not been dealt with, this does not mean that these points are accepted, and these other points may be addressed at the Inquiry.

2.0 INTRODUCTION TO MICHELLE BOLGER'S PROOF OF EVIDENCE

Appellant's Report on Landscape and Visual Matters

- 2.1 At paragraph 1.6.1, Michelle Bolger repeats her disagreement with the conclusions of the Landscape Report (**CD 2/1j/a**) but now considers, in her opinion, that the Landscape Report has not been undertaken in accordance with best practice. I deal with her Section 9 later on in this Rebuttal Proof.
- 2.2 Michelle Bolger then goes on to comment on the photographs provided in the Landscape Report (**CD 2/1j/a**) although during discussions on the Landscape Statement of Common Ground (**CD 1/3b**) Michelle Bolger comments only related to the presentation of the Site Context Photographs. As highlighted in my main Proof of Evidence (**CD 1/5a**), at paragraph 1.9, the Site Context Photographs have been resized and presented on A3 sheets and updated photograph sheets are included in my Appendices (**1/5b**). The photographs are 'Type 1 - annotated viewpoint photographs' in LI TGN 06/19 (**CD 7/2b**) used to record existing views, at the time of the site visits, and they are a tool / aide memoire to assist in the assessment of the Appeal Scheme and not the assessment itself nor are they purporting to illustrate the Appeal Scheme.

Visualisations

- 2.3 Paragraphs 1.7.1 and 1.7.2 of Michelle Bolger's Proof of Evidence (**CD 1/4a**) refer to the single visualisation provided as part of the Landscape Report (**CD 2/1j/d**) and the correspondence between landscape witnesses on visualisations. Michelle Bolger goes on to refer to TGN 06/19 Table 1, page 9 (**CD 7/2b**). This section of the

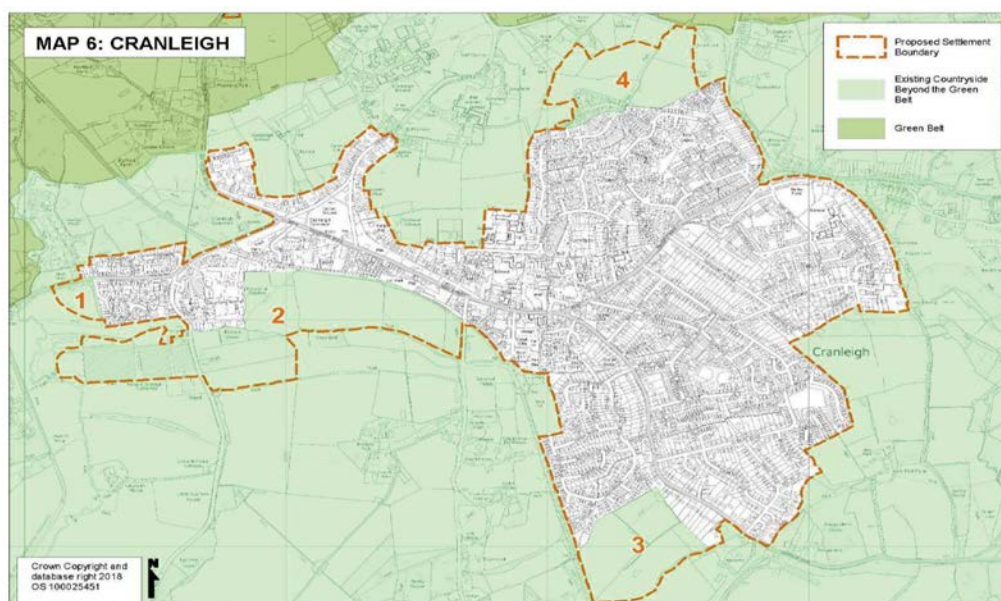
TGN 06/19, section 3, is headed 'Taking a Proportionate Approach' with section 3.2 headed 'Working with the Competent Authority', whilst section 3.5 refers to 'Selecting the Appropriate Visualisation Type'. The TGN does not require visualisations to be prepared in all instances and is guidance which 'aims to help landscape professional professionals, planning officers and other stakeholder to select types of visualisations appropriate to the circumstances to be used' and goes on to refer to GLVIA3 (**CD 7/2a**) which advocates 'proportionate and reasonable approaches' [TGN 06/19 paragraph 1.1.1 - page 1].

- 2.4 The Landscape Report (**CD 2/1j/a**) at paragraph 1.9 refers to the Pre-Application information sent to WBC and this would have been the time for the Council to agree the viewpoints and request any visualisations to be included in the Landscape Report so that the 'before' photographs could be taken during the winter period to accord with best practice. Discussions with Michelle Bolger occurred after the Appeal had been lodged and therefore any visualisations that would be prepared would use photographs taken after June 2023 and, therefore, would not follow best practice.
- 2.5 Michelle Bolger's (**CD 1/4a**) comments at paragraph 1.7.2 are noted but the Landscape Report (**CD 2/1j/a**) acknowledges that there will some longer term significant adverse effects to visual amenity from some short sections of Public Footpath No.379 and, in my opinion, visualisations would not have assisted the Inquiry as there would be further debate / disagreement on:
- a) whether the exact position and direction of view was right (as a minor change in position and direction can make a large difference in what is seen);
 - b) the type of visualisation to be presented (TGN 06/19 type 2, 3 or 4);
 - c) the period used (Year 1, and Year 10 or 15) to illustrate mitigation measures; and
 - d) whether the visualisations were accurate; and
 - e) whether the visualisations were helpful (or not).
- 2.6 Michelle Bolger appears to be critical of the fact that no new visualisations have been prepared for the Public Inquiry. Although Michelle Bolger did not request any to be prepared and could have prepared a number of visualisations to support her evidence although these would not have accorded with best practice as the 'before' photographs would have been taken during the summer / early autumn period. Michelle Bolger has opted to provide a series of cross sections instead. I comment on these cross sections later in the Rebuttal Proof.

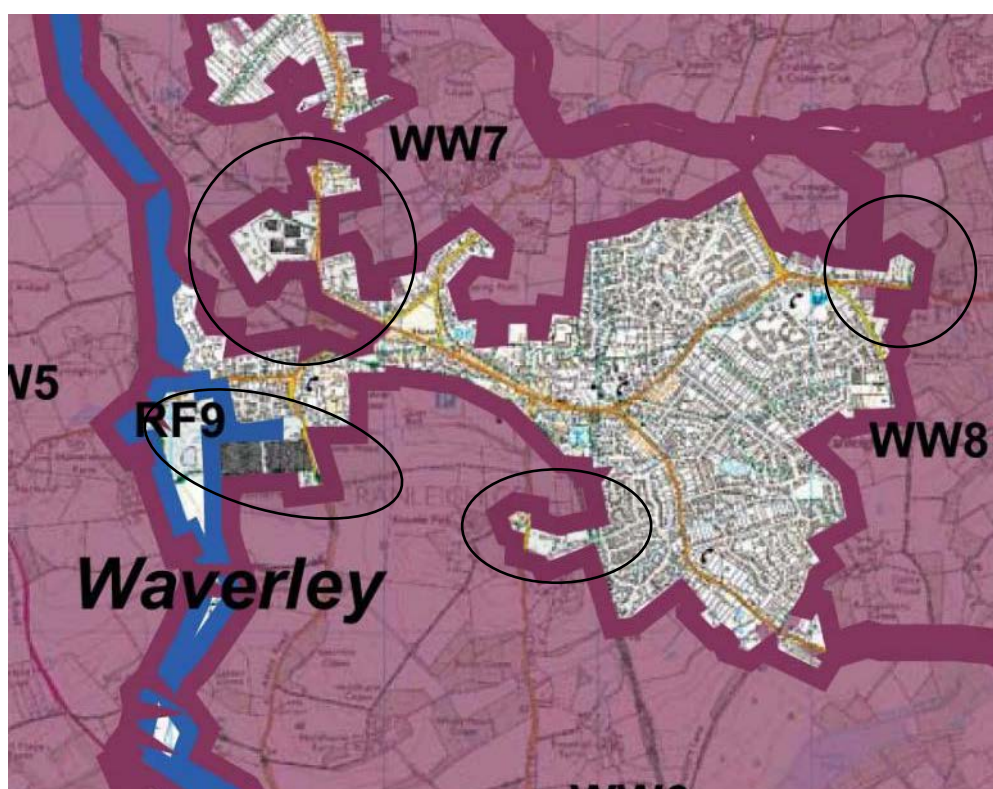
3.0 EXISTING LANDSCAPE CHARACTER: APPEAL SITE AND IMMEDIATE CONTEXT

- 3.1 Michelle Bolger in section 4.0 of her evidence (**CD 1/4a**) sets out her understanding of the baseline, which repeats much of the information contained in the DWLC Landscape Report (**CD 2/1j/a**) and Michelle Bolger's Landscape Briefing Note [LBN (**CD 2/3a**)]. However, the descriptions now refer to 'Medium Irregular Assarted Field' HLC subtype or 'assarted fields' as forming the origins of field boundaries and field patterns on numerous occasions although this point was not made in the LBN (**CD 2/3a**), the Officer's Report (**CD 4/1b**) or Council's Statement of Case (**CD 1/2b**).
- 3.2 I consider this point has limited relevance to the Appeal Site and proposed development, as Michelle Bolger's suggestion that there is a time-depth evident in the landscape is incorrect for the reason set out at paragraph 3.13 a) (iv) of my main Proof of Evidence (**CD 1/5a**). As highlighted in my evidence at paragraph 2.2 (v), HLC is a product of change and continuing change and is part of the overall character of a landscape and does not attach any importance or value to the landscape. In addition, I would normally expect considerations related to HLC to be included in the County / District or Borough Landscape Character Assessment (LCA) for the area as is the case with the WBC LCA 2015 (**CD 6/4g** - paragraph 2.5 on page 2); and the fact that the WBC Landscape Study 2014 (**CD 6/4e**) did not specifically refer to the SHLC may provide an indication of the limited relevance or importance given by Hankinson Duckett Associates (HDA) and WBC to the HLC in assessing landscapes around Cranleigh.
- 3.3 At paragraph 4.3.1, Michelle Bolger reiterates her view that the Appeal Site has retained a rural tranquil character and states that the '*influence of the settlement is limited*' because of a number of bullet points. The last three bullet points are new points not included in the LBN (**CD 2/3a**) the Officer's Report (**CD 4/1b**) or Council's Statement of Case (**CD 1/2b**).
- 3.4 I would acknowledge that the Appeal Site to the north is not adjacent to the built up edge of Cranleigh but adjoins Snoxhall Fields which do not preserve rural character, as they are obviously man-made, and in my view, have an urbanising influence albeit limited on parts of the Appeal Site as well as reducing the tranquillity of the area. I would however agree that the land uses to the north of the Appeal Site form parts of a transitional landscape east to west as well as north to south but I consider this transition includes the Appeal Site.

- 3.5 There is no direct public road access to the Appeal Site but the Appeal Site lies between Knowle Lane and south eastern parts of Cranleigh and whilst Michelle Bolger considers the influence of the settlement to be limited this is based on late spring and mid-autumn visits, not during the winter period when trees and other vegetation have lost their leaves and visibility of the existing built up edge of the town increases and when the influence of town, and other built development, on the Appeal Site is greater. I would agree that the properties on Knowle Lane are not within the settlement boundaries of the town, apart from dwellings to the north of the Snoxhall Fields entrance which are accessed off Knowle Lane and where development is on both side of the Down Link path and therefore DLp has not formed a constraint to the expansion of Cranleigh.
- 3.6 At paragraph 4.5.1, Michelle Bolger refers to the Landscape Report's (**CD 2/1j/a**) description the Coldharbour Farm group as an '*enclave of development*' and goes on to refer to the Surrey / Waverley Borough Landscape Character Assessment (**CD 6/4g**) and sub character WW6 – Dunsfold to Pollingfold Wooded Low Weald, which identifies this group and development on the west side of Knowle Lane as '*urban development*' excluded from the character area. I am surprised that Michelle Bolger did not mention this point in section 3.4 of her evidence (**CD 1/4a**) where she referred to the SLCA and now considers the identification of the Coldharbour Farm group plus dwellings to the west as a 'mistake' in the LCA.
- 3.7 I do not consider that Hankinson Duckett Associates (HDA) have made a mistake. By comparing the settlement boundary around Cranleigh, shown on the Local Plan Inset Map 6 (**CD 6/1a** – see below), with the Landscape Type WW: Wooded Low Weald character areas around Cranleigh [page 134 of the SLCA (**CD 6/4g** – see below) this is not an isolated occurrence or mistake as there are several '*urban development*' areas which extend beyond the settlement boundary such as development at Ruffold Farm and Elmbridge village to the west of Cranleigh and development along Bookhurst Road to the north east of Cranleigh.



Extract taken from the WBC Topic Paper on Settlement Boundaries dated November 2020 – Page 17



Extract taken from the WBC LCA showing areas that are different from the Settlement Boundaries Map6

- 3.8 Given that the LCA was prepared some time ago in 2014 / 15, it is difficult to know now why HDA identified the Coldharbour Farm group and other properties as urban development but they clearly felt that it was more than 'scattered dwellings and

farmsteads’ which may explain why this developed area was excluded from the character area WW6.

- 3.9 I would also add that the Surrey LCA was prepared by a reputable landscape consultancy (HDA), it has been reviewed by Surrey County Council Officers, Surrey Planning Officers Association and other stakeholders and has been through a public consultation exercise. The LCA has been used by the Council, Developers and consultants to inform numerous planning applications and decisions since 2015 and therefore I do not consider its findings to be ‘questionable’ as suggested by Michelle Bolger in paragraph 4.5.2 of her Proof of Evidence (**CD 1/4a**).

4.0 LANDSCAPE VALUE

- 4.1 Section 5.0 of Michelle Bolger’s proof of evidence (**CD 1/4a**) sets out her consideration of landscape ‘value’ and at paragraph 5.1.5, Michelle Bolger refers to the phrase *‘the site and its immediate landscape’* which includes parts of the wider landscape to which the Appeal Site contributes or which make a contribution to the Appeal Site and states *‘it is the immediate landscape that development on the site has the potential to affect’*. However, without a spatial definition of or description of the area involved including distances (either as metres or kilometres) it is not clear what the difference is between her identification of the ‘immediate’ landscape and the ‘wider’ landscape.
- 4.2 Table 2.0 of Michelle Bolger’s Proof of Evidence (**CD 1/4a**) repeats what is contained in Table 1 of the LBN (**CD 2/3a**) and I already commented in my main Proof of Evidence (**CD 1/4a**) on Table 1 – Landscape Value Assessment of the LBN (**CD 2/3a**) and Table 1 of the Landscape SoCG (**CD 1/3b**) and explained why I consider Michelle Bolger is wrong in some parts of her assessment.
- 4.3 At paragraph 5.2.2, Michelle Bolger highlights the changes that she has made to her assessment, mainly changes due the HLC and ‘before’ she had read the AIA, although I would point out that the original Table 1 in the LBN (**CD 2/3a**) included references to the AIA. References to the AIA are selective, in my view, as there is no mention of the lesser quality trees (Categories B or C) or trees that should be removed for sound arboricultural reasons (Category U) included in the 194 individual trees, 23 groups and 10 sections of hedgerow assessed in the AIA. In addition, I note that the AIA comment regarding historically ‘important hedgerows has been used twice as a reason for elevating ‘value’ in Table 2.0 in Michelle Bolger evidence

(once under the natural heritage heading and then again under cultural heritage heading).

4.4 Section 5.3 of Michelle Bolger's evidence (**CD 1/4a**) sets out a number of differences (4) between our assessments although I disagree with some of Michelle Bolger's comments. I would acknowledge that the Landscape Report (**CD 2/1j/a**) does not refer to the Surrey Historic Landscape Characterisation Study (**CD 7/2g**) but in relation to the first and second bullet of paragraph 5.3.1, I consider I already addressed this point above and also in my main Proof of Evidence at paragraph 2.2 (v) and 3.13 a) (iv)....

4.5 In relation to the third bullet point, I consider Michelle Bolger is incorrect in her assertion, in terms of the recreation criterion, that I have focused only on the Appeal Site itself. Michelle Bolger has obviously misread or misunderstood the text as it states:

"It is acknowledged that within the vicinity of the Site (north and east) there are areas with public access and a number of PROW including Downs Link Path and section of PROW across the central parts of the Site but the majority of the Site contains no formal public access and only parts are Site are experienced from PROW and accessible areas close to the Site". (underlining added)

4.6 In relation to the fourth bullet, I have already commented above on the development extending through the Appeal Site but have also considered tranquillity in my main Proof of Evidence (**CD 1/5a**) at paragraph 3.13 item g). Tranquillity is more than just the influence of built development on rural character, a point MB appears to ignore.

5.0 OTHER STUDIES

5.1 Section 6 of Michelle Bolger's proof of evidence (**CD 1/4a**) refers to three Waverley Borough Council studies, which are adopted as part of the Council's evidence base and Cranleigh Parish Council's 'Review of Cranleigh Areas of Strategic Visual Importance' dated July 2018. Michelle Bolger has raised a number of new points in this section of her proof of evidence (**CD 1/4a**) which were not made in the LBN (**CD 2/3a**), the Officer's Report (**CD 4/1b**) or Council's Statement of Case (**CD 1/2b**).

WBC Landscape Study 2014

5.2 At paragraph 6.3.1, Michelle Bolger highlights an obvious point, that the WBC Landscape Study (**CD 6/4e**) was undertaken prior to the publication of 'An approach to landscape sensitivity assessment – to inform spatial planning and land management by Natural England' (ALSA June 2019) and therefore does not follow

the methodology recommended in that document. However, Michelle Bolger does not acknowledge that the Landscape Study, prepared by AMEC, followed a methodology based on '*Topic Paper 6: Techniques and Criteria for Judging Capacity and Sensitivity*' published by the Countryside Agency (now Natural England) and Scottish Natural Heritage in 2002, which was the guidance on capacity and sensitivity assessments available at the time the Study was being undertaken. '*Topic Paper 6*' was a discussion document providing an overview of the thinking about landscape sensitivity and capacity in terms of both the concepts involved and practical techniques being used at the time the topic paper was produced. The document highlighted a number of different methods / approaches being used but left it to the landscape practitioner to devise their own method for any particular study. A copy of Topic Paper 6 is included as Appendix 1 to this Rebuttal Proof.

- 5.3 Given that the Landscape Study was prepared some time ago 2013 / 2014, and that the methodology used is not very precise but refers to 'Topic Paper 6', it is not possible to know what AMEC actually considered as part of the assessment but 'Topic Paper 6' deals with landscape sensitivity on page 4 and 5 and Figure 1 (b) on page 5 provides a 'Summary of the factors to consider in judging landscape capacity for a particular type of change'. This figure identifies Landscape Sensitivity and Visual Sensitivity and Landscape Value as separate items and the structure of the Landscape Study (**CD 6/4e**) suggests that AMEC used this approach as opposed to the one set out on page 4. However, Michelle Bolger at paragraph 6.3.14 of her Proof of Evidence is wrong to criticise the methodology used by AMEC in undertaking the Study as, at the time the assessment was carried out, there was no standard or recommended method or guidance available.
- 5.4 Michelle Bolger also refers in paragraph 6.3.2 to the Landscape Study reference to '*Guideline for Landscape and Visual Impact Assessment – Third edition*' (**CD 7/2a**) and goes on to state that the Landscape Study is '*not consistent with GLVIA3*' (**CD 7.2a** - paragraph 5.39 page 88) in assessing landscape sensitivity. I would not expect the Study to be consistent with GLVIA3 (**CD 7/2a**) for the reason set out on page 6 of the current ALSA guidance which would have also been relevant in 2014.
- 5.5 Page 6 of ALSA highlights that the ALSA offers a '*generic process to inform strategic spatial planning and land management*' and importantly a distinction needs to be drawn between ALSA method and the assessment of sensitivity dealt with in GLVIA3 (**CD 7.2a**). ALSA approach draws on the definition of sensitivity set out in GLVIA3 (**CD 7/2a**) but the ALSA method for assessing sensitivity and susceptibility need to

be modified to reflect the specific development type / development scenario or other change. Whereas the GLVIA3 method for assessing sensitivity uses a 'known development proposal' and 'specific site' in assessing sensitivity and susceptibility, the ALSA takes a more strategic assessment of landscape sensitivity and susceptibility and therefore the WBC Landscape Study (**CD 6/4e**) should not be consistent with GLVIA3.

5.6 Michelle Bolger in paragraphs 6.3.4 to 6.3.14 then goes on to criticise the Landscape Study (**CD 6/4e**) and its conclusions, primarily on the basis that the reasoning behind the judgements reached in the Study are not transparent, inaccurate and inadequate and do not align with her assessment of the Appeal Site and its surroundings. On this basis, Michelle Bolger concludes that the Landscape Study cannot be relied on (paragraph 6.3.14 of her Proof of Evidence).

5.7 I make the following comments regarding Michelle Bolger's assessment of the Council's Landscape Study (**CD 6/4e**):

- a) Landscape sensitivity and capacity studies such as the WBC Landscape Study are generally 'high level' assessments which assess the ability of the landscape to accommodate future residential or other development and therefore do not include the same level of detail contained in a landscape and visual appraisal (LVA) report or landscape and visual impact assessment (LVIA) report. The Landscape Study (**CD 6/4e**) would be 'proportionate' to the task / brief provided by the Council and any financial budget constraints;
- b) Notwithstanding Michelle Bolger's opinion of the Landscape Study (**CD 6/4e**), the document has been prepared by a reputable landscape consultancy and staff at AMEC. It has been reviewed by Waverley Borough Council Officers and other stakeholders and has been through a public consultation exercise. The Landscape Study (**CD 6/4e**) has been used and relied on by the Council, Developers and consultants to inform numerous planning applications and decisions since 2014;
- c) Given the 'high level' nature of the Landscape Study, I am not surprised that AMEC have concluded the same 'moderate' landscape sensitivity and 'medium' value as a result of their assessment for areas CL1 - B, CL1 - C, CL1 - D, CL2 - A and CL2 - B (as well as CL3 – A and CL3 – B, CL4, CL7 – A elsewhere around the town) even if there are areas with very different value and sensitivity;
- d) Michelle Bolger has provided no evidence to support her comment regarding whether WBC took into account the conclusions of the Landscape Study (**CD**

6/4e) in allocating Strategic Sites SS4 and SS5 through the Local Plan Part 1 (**CD 6/1a**) but what Figure 9 of her evidence (**CD 1/4a**) does illustrate is that landscape considerations need not constrain development on the edge of Cranleigh;

- e) Michelle Bolger also highlights at paragraph 6.3.11, that there is no description of character or quality of the landscape or the HLC type / subtype. However, a very broad description of Segment CL1 is given on page 7 and subdivisions made based on the variety in local character and how each sub area relates to the settlement and access in these areas. Table 3.1 sets out a Summary of the finding and, therefore, I would not expect to see a detailed description of the CL1 area and each sub areas, A to D, and other detailed points as this is a summary not the actual assessment that AMEC undertook; and
- f) A similar point would apply to HLC type / subtypes as this may not have been part of the WBC brief to AMEC but I would have expected this to be included in the WBC Landscape Character Assessment (**CD 6/4g**) which forms the LCA baseline.

WBC Land Availability Assessment 2020

- 5.8 In section 6.4 of her Proof of Evidence, Michelle Bolger highlights the conclusions of the 2020 Land Availability Assessment (**CD 6/4j**) and also refers to paragraph 2.36 of the Landscape Report (**CD 2/1j/a**). However, in my view Michelle Bolger has taken the report text out of context. Paragraph 2.36 of the Landscape Report (**CD 2/1j/a**) states:

2.36 *“Apart from the fact that the SHLAA refers to the wrong landscape document in the rejection section, (it should have referred to the 2014 Landscape Study not Landscape Review), the SHLAA appears to be relying on a dated document and does not properly reflect the analysis or conclusions of the Landscape Study. The area with ‘strong rural and pastoral character’ is the landscape to the south of the plantation not the Site. It should also be noted that the comment ‘development in this area would likely have a negative impact on the landscape’ could / would apply to any ‘greenfield’ site on the edge of an existing settlement and therefore this is not strong or overriding reason for rejecting the Site”.*

- 5.9 Michelle Bolger acknowledges, at paragraph 6.7.2, that the quote from the LAA refers to the area to the south of the Appeal Site but MB then considers it accurately describes the character of the Appeal Site. I would disagree with this assertion for

the reasons given in my main Proof of Evidence at paragraph 3.17 (**CD 1/5a**). The land to the south of the Appeal Site has a strong rural character and is a more open landscape.

- 5.10 I also would point out that the Landscape Study 2014 (**CD 6/4e**), prepared by AMEC, considered a wider area to the south and west of Cranleigh and not just the Appeal Site and a broad 'high level' description of the area is provided in the Landscape Study. I would also not expect the LAA to provide detail description of the character of the Appeal Site as that is not the purpose of the LAA.

6.0 LANDSCAPE EFFECTS OF THE PROPOSALS

- 6.1 Section 7 of Michelle Bolger's Proof of Evidence (**CD 1/4a**) repeats a lot of the comments set out in the LBN (**CD 2/3a**) although it should be noted that the landscape harms listed in paragraph 7.1.1, are reduced to three bullet points, one of which is a new point, ('harm to the wider landscape') and is not mentioned in the LBN (**CD 2.3a**), the Officer's Report (**CD 4/1b**) or Council's Statement of Case (**CD 1/2b**). I respond to this and other points in Section 7 below.

Loss of existing landscape character

- 6.2 At paragraph 7.21, reiterates Michelle Bolger's opinion that this a 'valued' landscape which I disagree with for the reasons set out my main Proof of Evidence at paragraphs 3.13 to 3.15 (**CD 1/5a**) as well as section 3.0 of this Rebuttal Proof. Michelle Bolger goes on to state that the assarted fields will be entirely lost to residential development and that they have also been lost in much of the area surrounding the Appeal Site. I acknowledge that there would be a change to the 'open' assarted fields but the structure of hedgerows and trees associated with this historic landscape characterisation sub-types would remain forming the boundaries to the Appeal Site. In addition, whilst part of the 'medium irregular assarts and copse with wavy boundaries' HLC sub-type will change other fields to the south remain as would other field patterns / systems situated to the west of the Appeal Site.
- 6.3 Paragraphs 7.2.6 (and 7.3.6) refer to lighting which is a new point, although Michelle Bolger has not described anywhere in the LBN (**CD 2/3a**) or her Proof of Evidence (**CD 1/4a**) the existing baseline lighting situation as part of her consideration of this aspect of the landscape. Michelle Bolger considers that '*lighting within the development will be very clear from the Downs Link path (DLp) and will make the presence of built development very clear*' as '*it is easy to distinguish between lights*

from scattered dwellings such as the Coldharbour Farm group and lights from an urban development’.

- 6.4 I would acknowledge that lighting needs to be considered as part of the assessment of the baseline landscape, as well as the landscape and visual impacts and effects although I do not agree with Michelle Bolger that the effects of lighting will be ‘very clear’ from the DLp and, as a consequence, the presence of built development will be ‘very clear’.
- 6.5 I consider that Michelle Bolger is exaggerating the likely lighting impacts and effects especially considering that DLp is wooded, existing views from the path are restricted in nature and extent with housing areas set back from the DLp boundary and the existing wooded areas along DLP would also reduce any impact and effects. In addition, in the long term the proposed mitigation measures include strengthening of the DLp boundary with additional tree and understorey reinforcing the existing screen and therefore reducing the alleged harm Michelle Bolger asserts.

Harm to wider landscape

- 6.6 Paragraphs 7.3.1 to 7.3.6 of Michelle Bolger’s Proof of Evidence (**CD 1/4a**) repeats some of the commentary contained in the LBN (**CD 2/3a**) although in this instance she alleges that these effects and harms would now impact on the wider landscape. However, as mentioned earlier without a spatial definition or description of the local and wider area involved including distances (either as metres or kilometres) it is not clear what the extent of the wider landscape is. In my view, the wider area which Michelle Bolger is referring to, is the ‘local landscape’ as defined in the Landscape Report (**CD 2/1j/a** – paragraph 1.3 on page 1) and therefore all these effects that Michelle Bolger considers to be harmful are localised to the Appeal Site and, in my opinion, would not affect the wider landscape.
- 6.7 Michelle Bolger’s comment regarding the irregular disjointed nature of the Appeal Site are dealt with in my main Proof of Evidence (**CD 1/5a**) at paragraphs 6.8 to 6.11, whilst paragraphs 6.12 to 6.13 deal with Michelle Bolger’s consideration of the Knowle Lane access. However, Michelle Bolger is now raising a new point in that the proposed planting illustrated on the Photomontage A and also Drawing No. 0350 / L10 is considered ‘inappropriate’. As with other points made by Michelle Bolger, the alleged inappropriate nature of the planting is not mentioned in the LBN (**CD 2.3a**) nor the Officer’s Report (**CD 4/1b**) or Council’s Statement of Case (**CD 1/2b**).

In addition, the Council's Tree Officer has not raised this as an issue in his consultation response.

- 6.8 By reference to Drawing No. 0350 / L10 (**CD 8/1f**) and the planting schedule, the majority of the plants proposed are native species with the plan indicating ivy and native shrub planting (Field Maple, Common Dogwood, Hazel, Hawthorn, Common Spindle, Holly, Blackthorn, Field Rose, Dog Rose, Wayfaring Tree and Guelder Rose) immediately adjoining Knowle Lane which, apart from the variegated Dogwood species, already exists along sections of Knowle Lane.
- 6.9 In addition, whilst the species lists include evergreen shrubs and ground cover plants, such as Common Laurel these species are also found along Knowle Lane at the entrance to Oaklands to the north, the Coldharbour Farm group adjoining the new access and also the entrance to the Redhurst group of development to the south. Therefore, I do not agree with Michelle Bolger that the proposed planting would be 'typical' of planting on a new housing estate. The proposed planting reflects and respects the existing species along (and therefore appearance and character of) Knowle Lane.

Poor relationship with the existing settlement of Cranleigh

- 6.10 This section deals with Michelle Bolger's views on the relationship of the Appeal Site with Cranleigh which I have already addressed in my main Proof of Evidence (**CD 1/5a** – paragraphs 6.8 to 6.12).
- 6.11 However, at paragraph 7.4.2, Michelle Bolger is unclear why the Appeal Site includes half of an existing field. I can clarify the reason for this. The half of the field outside the Appeal Site is not owned by the same landowner but a neighbour and the reason there is no barrier between the two ownerships is that there is an informal arrangement between owners to manage the field as one field making it easier for the local farmer to cut and process the semi-improved grassland.
- 6.12 At paragraph 7.4.5 of Michelee Bolger's evidence (**CD 1/4a**) considers that there is no meaningful relationship between the Appeal proposals and the western edge of Cranleigh because of the Downs Link path. However, whilst the DLp is a wooded route, people using the path including residents of Cranleigh will be well aware of the existing development to the east and to a lesser degree to the west and therefore there is a meaningful relationship. Also, Michelle Bolger is ignoring the fact that

development is already on both side of the DLp to the north of Snoxhall Fields and the DLp has not formed a constraint to the expansion of the town.

Consistency with Landscape Character Strategies / Guidance

- 6.13 This section of Michelle Bolger's evidence (**CD 1/4a**) is new and similar statements were not included in the LBN (**CD 2/3a**), the Officer's Report (**CD 4/1b**) or Council's Statement of Case (**CD 1/2b**). I acknowledge that the Appeal Scheme will not be consistent with or adhere to all the landscape strategy and guidance set out in the SLCA (**CD 6/4g**) . However, this is to be expected and Michelle Bolger's comments would apply to any new development on a greenfield site such as the Appeal Site. If Michelle Bolger's approach was followed there would be no new housing development within Waverley Borough as it would not be consistent with the SLCA strategy and guidance.
- 6.14 I note that Michelle Bolger acknowledges that the proposed development would be consistent with SLCA guidance relating to containing built form within a treed setting.

Landscape Sensitivity

- 6.15 As with other sections of Michelle Bolger's Proof of Evidence (**CD 1/4a**) this section is new and was not included in the LBN (**CD 2/3a**) or the Officer's Report (**CD 4/1b**) and is one of the reasons I considered in paragraph 6.4 of my main proof of evidence (**CD 1/5a**) that the LBN did not follow GLVIA3 and is not robust. However, this section dealing with susceptibility effectively lists a series of statements or number of losses and alleged harms and I consider it still does not follow GLVIA3 or Michelle Bolger's methodology Appendix 2.
- 6.16 Paragraph 12 of Michelle Bolger's methodology repeats paragraph 5.40 of GLVIA3 and goes on to state: "*Judgements about susceptibility of the landscape are recorded on a verbal scale of high, medium and low and the basis for the judgements is made clear and linked back to evidence from the baseline study as required by GLVIA para 5.43*". However, the methodology does not define what is meant by 'high, medium and low' ranking of susceptibility against which the type or nature of change can be judged. Michelle Bolger's evidence (**CD 1/4a**) also refers to an intermediate ranking of susceptibility, at paragraph 7.6.4 and 7.6.5 and it unclear how these judgements were made.
- 6.17 I would assume the 'medium' ranking of susceptibility is equivalent to my 'moderate' ranking but it would be helpful if the method had a similar series of examples (or

criteria) as the Landscape Report Appendix A – Table 2 (**CD 2/1j/e**) does to define this verbal scale. In addition, it is not clear, how the changes listed are linked back to the baseline study. Also, I note that Michelle Bolger's methodology does not explain how the interaction of value and susceptibility result in sensitivity and it would be helpful if the method included a table similar to Table 3 of Appendix A of the Landscape Report.

7.0 EFFECTS ON VISUAL AMENITY

- 7.1 I note that at paragraph 8.1.1 of Michelle Bolger's Proof of Evidence (**CD 1/4a**) that the visual changes will only effect the 'local' landscape character. I consider this comment could equally apply to the landscape effects of the Appeal Scheme as there are no direct landscape changes resulting from the development proposal on land outside the Appeal Site - only indirect changes and effects on views. I do not wish to repeat my visual assessment nor reiterate the comments I have already made in my main Proof of Evidence in paragraphs 5.14 to 5.23 (**CD 1/5a**).
- 7.2 At paragraph 8.1.2, Michelle Bolger refers to her methodology contained in Appendix 2. However, Michelle Bolger does not highlight the verbal scale of susceptibility, value in determining sensitivity or the scale used for magnitude of change and only refers to her scale of 'major to minor' for the significance of effects. Neither does this section set out how the sensitivity of views was judged and therefore it is not clear and transparent what factors have been taken into account in determining sensitivity.
- 7.3 I would also make a similar point regarding the definition of what is meant by the verbal scale for significance of effects. It would be helpful if the method had a similar series of examples (or criteria) as the Landscape Report Appendix A – Table 5 (**CD 2/1j/e**) did to define this verbal scale as well as examples or descriptions of the degree of change, duration of change and magnitude of change as set out on page 13 and 14 of the Landscape Report Appendix A methodology (**CD 2/1j/e**). Without them, decision makers and readers of Michelle Bolger Proof of Evidence (**CD 1/4a**) cannot fully understand the process and rankings involved.
- 7.4 I also note in this section that Michelle Bolger refers to (and relies) on a number of Cross Sections, Figures 10 to 20 contained in her Appendices (**CD 1/4 b/i & b/ii**), although I note that apart from listing Figures 17 to 20 in the contents page of the proof (**CD 1/4a**) there is no reference to these four figures in her Proof of Evidence.

I also highlight that the scale of the sections is not referred to on the sheets but they include a 30 metre scale bar which scales at 1:1250 at A3.

- 7.5 I would agree that cross sections are one tool which can illustrate a change in the views but they are 2 dimensional illustrations and only capture changes along the section line itself. They are helpful in that they show the distance between the viewer and the built form and the change resulting from an increase in distance i.e. compare Section A-A proposed, B-B proposed, C-C proposed with section D-D proposed and E-E proposed. However, cross sections do not illustrate that both the height and width of a building will reduce by $\frac{1}{2}$ with a doubling of distance and therefore in reality a building reduces by a $\frac{1}{4}$ in size, scale and height.
- 7.6 In addition, cross sections do not illustrate the filtering / screening effect that existing trees and hedgerows have in reducing the nature and extent of views. An example of this is Cross Sections B-B Figures 14 which illustrate a view line from the southern section of Public Footpath No. 379 and shows that houses along the northern edge of Field 3 would be clearly visible. However, when compared to the photographs from approximately the same position on the footpath, Figure 34 and 35, it is clear that the extent of building would be significantly reduced due to the tree and hedge cover along the Redhurst access road.
- 7.7 In relation to Cross Section A – A, Figures 11 and 12 show the view line from the edge of Snoxhall Field and that roof tops some houses will be seen to the south of The Brew and West Barn (a point that Michelle Bolger highlights is not mentioned in the Landscape Report Table 3 (CD 2/1j/a)). I would comment that the extent of the roofs seen within the central eastern parts of the Appeal Site (southern edge of Field 2) measures at 3 metres above the roof of West Barn group and given that the viewer is approximately 360 metres from the buildings, I consider that there would be limited impact and does not change my assessment of the likely effects nor the comments set out in my main Proof of Evidence at paragraph 5.22 and 5.23 (CD 1/5a).
- 7.8 I would also add that the Cross Sections clearly demonstrate that the buildings nearest the viewer will screen and hide the houses further way and therefore the full extent of the development will not be perceived.

8.0 SECTION 9 MICHELLE BOLGER'S COMMENTS ON THE LANDSCAPE REPORT

- 8.1 In this section of this Rebuttal Proof I address some of the comments made by Michelle Bolger on the Landscape Report (CD 2/1j/a) but I would add that this section

of her proof is not a review of the Landscape Report as originally stated in the introduction of the LBN (**CD 2/3a**).

Overall Structure

- 8.2 I note Michelle Bolger's comments regarding what landscape assessments have been undertaken. I can clarify that two landscape and visual appraisals or assessments of the Appeal Site and surrounding area have been undertaken. The first was a preliminary landscape and visual appraisal (LVA) based on a site visit in 2018, to provide advice to Gleeson on the promotion of the Appeal Site through the Waverley Local Plan Review exercise, when the exact nature and extent of the development proposals were unknown.
- 8.3 The second landscape and visual appraisal and impact assessment (LVIA) was based on site visit undertaken in 2021, the outcome of which was the Report on Landscape and Visual Matters, dated January 2023, [which is referred to in my main Proof of Evidence (**CD 1/5a**) as the Landscape Report (**CD 2/1j/a to e**)], once the Development Parameters were fixed / determined and an Illustrative Masterplan and Landscape Strategy Plan were prepared to show a way of developing the Appeal Site.
- 8.4 At paragraph 9.2.3, Michelle Bolger states that she would not usually expect a Landscape and Visual Appraisal to include consideration of the suitability of the Site for development. Michelle Bolger goes on to provide an opinion on what should be included in an LVA. I note Michelle Bolger's comments but the contents of a landscape report can be defined to a degree by the brief provided by the client and, in this case, I included commentary in the Landscape Report (**CD 2/1j/a** – page 51) on how the baseline landscape and visual assessment of the Appeal Site and its surroundings has informed, through landscape guidelines, the iterative design development of the Development Parameters and Illustrative Masterplan.
- 8.5 I also note the comments that Michelle Bolger makes in paragraph 9.2.4 of her Proof of Evidence (**CD 1/4a**) and consider them to be disingenuous as clearly Section 3 of the Landscape Report is an examination of the landscape and visual baseline of the Appeal Site and surrounding area, including views towards the Appeal Site from key viewpoints. Michelle Bolger's comment regarding 'best practice' is not referenced by any guidance in GLVIA3, nor has Michelle Bolger set out the text she is referring to. I assume her comment relates to Table 1 – Key Viewpoint: Baseline Situation

including a description of the visibility of the development refers to in Viewpoint Ref 2, 3 and 4 which describes the nature and extent of views from DLp and states:

“Photograph No.3 and 4 are contrasting views from the DLp as from these vantage points views into the Site (Field F3 and F5) are severely restricted by trees and understorey vegetation along the DLp although from these viewpoints some parts of the proposed development may be perceived”.

And also Table 1 Viewpoint Ref 9 and 10 which describe the nature and extent of views from the south western section of Public Footpath No.379 and states:

“However, the rooftops of the proposed development may just be perceived to the left side of view from Viewpoint No.10 and through trees from Viewpoint No.9”.

- 8.6 In my view, none of the above text could be construed as a description of the visibility of the development nor are they an assessment of the visual impacts and effects of the development.

Methodology – Assessment of Landscape Value

- 8.7 Section 9.3 of Michelle Bolger’s evidence (**CD 1/4a**) sets out a number of criticisms of the Landscape Report, Appendix A methodology (**CD 2/1j/e**); and at paragraph 9.3.4, Michelle Bolger considers that Table 2 in Appendix A sets out an alternative set of criteria to those in TGN 02/21 which do not accurately reflect the TGN 02/21 criteria.
- 8.8 I do not consider that Table 2 in Appendix A sets out an alternative method of assessing the ‘value’ of landscape. GLVIA3 at paragraph 5.45 highlights that *“the value of landscape receptors will to some degree reflect landscape designation and the level of importance which they signify, although they should not be over-reliance on designations as the sole indicator of value”*. It then sets out what assessments should reflect, whilst paragraph 5.47 suggests that *‘nationally designated landscape should be accorded the highest value’*. That advice is also highlighted on page 13 ref 5 (7) of the Landscape Institute Draft Technical Guidance Note 05/23 – Notes and Clarification, a copy of which is attached as Appendix 2 to this Rebuttal Proof.
- 8.9 Table 2 in Appendix A (**CD 2/1j/e**), in my opinion, reflects the advice in GLVIA3 (**CD 7/2a**) and TGN 05/23 as it helps define what is meant by landscape ‘value’ using a scale of ‘Very High, High, Moderate and Low’ and is closely aligned to the hierarchy of landscapes within the UK as mentioned in my main Proof of Evidence at paragraph

3.8 (**CD 1/5a**). In addition, as highlighted on page 6 of Appendix A (**CD 2/1j/e**), Table 2 is used as a guide for judging landscape value and susceptibility.

- 8.10 I also do not see that the ranking of landscape 'value' needs to follow or be consistent with guidance contained in the TGN 02/21 (**CD 7/2c**). TGN 02 / 21 does not define the threshold above which a landscape is considered to be a 'valued' landscape (paragraph A4.2.12 of TGN 02/21) nor does the TGN 02/21 provide advice on how the judgement made on individual factors should be combined to provide an overall judgement or 'value' of a particular area of landscape. Paragraph 2.4.5 of TGN 02/21, second bullet suggests that *"it is important to step back and judge the overall 'weight of evidence' in coming to an overall judgement on landscape value"*.
- 8.11 Michelle Bolger in paragraph 9.3.4 is misrepresenting the contents of Table 2 by suggesting that the very highest value an undesignated landscape might achieve would be 'moderate' value. The 'Very High' category includes landscapes with a 'high degree of scenic quality and public access' factors which are included in TGN 02/21, whilst the 'High' category includes 'or features considered to be important components of the landscape', again factors which are included in TGN 02/21. In my view this allows undesignated landscapes to be assessed as high or very high should the evidence indicate that is the case.
- 8.12 I therefore do not consider that the 'bar' is set too high nor do I consider that there is bias in Table 2 which would lead to an underestimation of the landscape value outside designated areas. In addition, Appendix 4 of TGN 02 /21 paragraph A4.2.12 highlights that *"the identification of landscape value needs to be applied proportionately ensuring that identification of 'valued landscape' is not over used"* which is, in my view, particularly relevant to the Appeal Site and surrounding land.

Application of Methodology – Landscape Receptors

- 8.13 At paragraph 9.4.1 and 9.4.2, Michelle Bolger is unclear why existing hedgerows and trees are assessed as having 'moderate to low' and quotes various sections of the AIA report (**CD 2/1i**). I have already addressed this in part in paragraph 4.3 above and addressed the historical point in paragraph 3.2 and do not intend repeating my comments here.
- 8.14 At paragraph 9.4.4, Michelle Bolger raised a number criticisms / points relating to some of the landscape receptors and judgement reached. I wish to comment on the following matters.

First Bullet – eight or ten landscape receptors point and Fourth Bullet which repeats the first bullet:

- 8.15 Michelle Bolger is correct that I have identified ten landscape receptors in the LSoCG Table 2. This is to reflect the assessment text in paragraph 4.38 of the Landscape Report (**CD 2/1j/a**) where I consider the impacts on Landscape Patterns / Site Character taking account of the development differences within the Appeal Site before coming to an overall judgement of the significance of effects on the whole site. I would acknowledge that housing areas and landscape open space areas are not strictly receptors but I consider open landscape and landscape proposals counter balance the impacts of built development by setting the development back from features or elements which are proposed to be retained, providing transition areas to adjoining countryside or providing the setting to The Brew and West Barn and softening the visual effects of development.

Second Bullet – Trees and Hedgerows – Low sensitivity point:

- 8.16 An explanation for how this judgement is reached is set out in paragraph 4.14, 4.17 a) and 4.18 of the Landscape Report (**CD 2/1j/a**).

Three Bullet – Pasture Fields / Plantations – Magnitude of change point:

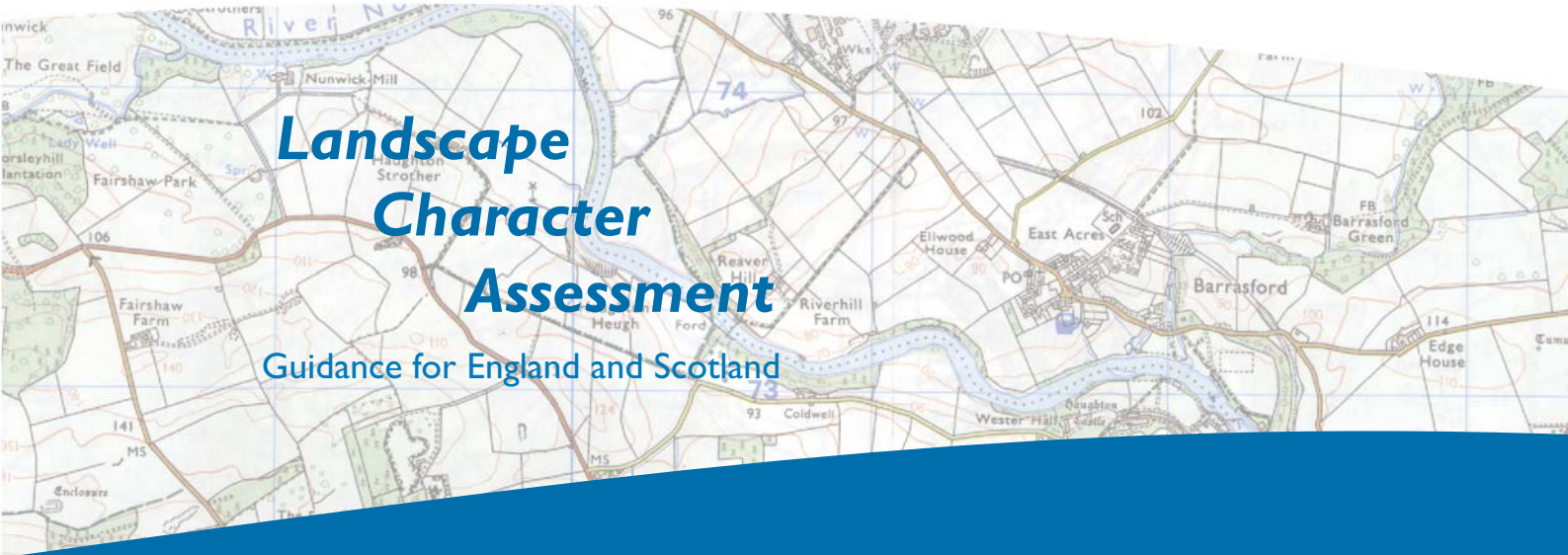
- 8.17 I consider that this point is addressed in the Landscape Report (**CD 2/1j/a**) paragraph 4.19 to 4.25 where an explanation is provided on how I considered changes to the landscape elements within and adjoining the Appeal Site and do not intend repeat them here. I would add that all the northern parts of the Appeal Site effectively remain unchanged so Michelle Bolger's assertion that the current pastoral / plantation land use will be entirely lost is incorrect as she has not correctly described or considered the development proposals.

9.0 CONCLUSION

- 9.1 On the basis of the above I consider that Michelle Bolger has overestimated the 'value' of the Appeal Site which has raised the sensitivity of the Appeal Site, exaggerated the perceived landscape harm and also exaggerated the perceived visual impacts.
- 9.2 Michelle Bolger obviously does not agree with the proposed landscape strategy but it should be noted that her own assessment indicates that in the longer term (Year 15) there will be a reduction in the adverse effects / harm to landscape effects but

this reduction is to not reflected in Michelle Bolger's assessment of visual effects
albeit the difference between us are half or one level of significance of effects.

APPENDIX 1 – A copy of ‘Topic Paper 6: Techniques and Criteria for Judging Capacity and Sensitivity’ published by the Countryside Agency (now Natural England) and Scottish Natural Heritage in 2002 .



Landscape Character Assessment

Guidance for England and Scotland

TOPIC PAPER 6: Techniques and Criteria for Judging Capacity and Sensitivity

An exploration of current thinking about landscape sensitivity and landscape capacity, to stimulate debate and encourage the development of common approaches.

I. INTRODUCTION

1.1 The Countryside Agency has recently published a report [1] that looks forward to the way that the countryside might evolve up to the year 2020. It makes it clear that change in English rural landscapes is inevitable in the next 20 years, as a result of a variety of social and economic forces, including food production, housing needs, transport issues, and energy requirements. At the same time the Agency published the results of a public opinion survey suggesting that 91% of English people want to keep the countryside exactly as it is today. Clearly the two are not compatible and hard decisions are inevitably required about how the many different demands that society makes on the land can be accommodated while also retaining the aspects of the environment that we place such high value on. Although there have been no exactly parallel studies of future landscapes in Scotland and of attitudes to them, the recent report on change in Scotland's rural environment [2] shows that similar issues also arise there. Indeed Scotland has been at the forefront of efforts to consider the capacity of Scotland's landscapes to accommodate change of various types.

1.2 In both England and Scotland, Landscape Character Assessment is being widely employed as a tool to help guide decisions about the allocation and management of land for different types of development. It is being used particularly to contribute to sensitivity or capacity studies dealing with the ability of the landscape to accommodate new housing, wind turbines and other forms of renewable energy, and new woodlands and forests, as well as locally significant types of development such as, for example, aquaculture schemes in Scotland. Work of this type inevitably involves consideration of the sensitivity of different types and areas of landscape and of their capacity to accommodate change and development of particular types. If carried out effectively, Landscape Character Assessment can, in these circumstances, make an important contribution to finding solutions that allow essential development to take place while at the same time helping to maintain the diverse character and valued qualities of the countryside. Making decisions based on sensitivity and capacity is a difficult and challenging area of work and also one that is developing rapidly as more and more studies of this type are carried out. The terms themselves are difficult to define accurately in a way that would be widely accepted.

1.3 This Topic Paper provides an overview of current thinking about landscape sensitivity and landscape capacity in terms of both the concepts involved and the practical techniques that are being used. It is not intended to provide a definitive method for assessing sensitivity and capacity but rather to help those involved in such work by setting out some of the key principles, clarifying some of the issues, helping with definitions of key terms and providing examples of the approaches that are currently being used. In this way the intention is to encourage greater transparency in the thinking applied to these issues and to promote consistency and rigour in such work. The content of the paper is based on a workshop involving a small group of practitioners involved in work of this type and review of a small selection of recent studies. It was not the intention, and nor were the resources available, to carry out a comprehensive review of published reports or work in progress in this area, or a wide ranging consultation exercise.

2. WHAT EXISTING GUIDANCE DOCUMENTS SAY ABOUT SENSITIVITY AND CAPACITY

2.1 The topic of landscape sensitivity and capacity proved one of the most difficult to deal with in the main Landscape Character Assessment (LCA) guidance. This was due to both the new and rapidly developing nature of much of this work and also to the great variation in the approaches being applied and the terminology being used. In addition there were some concerns about the need for compatibility with the definitions of sensitivity being developed in the separate 'Guidelines for Landscape and Visual Impact Assessment' [3] which was due to be published at the same time. As a result the published version of the LCA guidance omitted specific reference to landscape sensitivity and instead contained only a few short paragraphs on the topic of landscape capacity on the basis that the issues would be dealt with more fully in a later Topic Paper. For convenience, the current wording of the LCA guidance is summarised in Box 1.

Box 1: What the existing guidance says about capacity

"Landscape capacity refers to the degree to which a particular landscape character type or area is able to accommodate change without significant effects on its character, or overall change of landscape character type. Capacity is likely to vary according to the type and nature of change being proposed"

"Many Landscape Character Assessments will be used to help in decisions about the ability of an area to accommodate change, either as a result of new development or some other form of land use change, such as the introduction of new features, or major change in land cover such as new woodland planting. In these circumstances judgement must be based on an understanding of the ability of the landscape to accommodate change without significant effects on its character. Criteria for what constitutes significant change need to be identified in planning policies or landscape strategies, and will usually be informed by potential effects on character and/or particular features and elements"

Carys Swanwick and Land Use Consultants. Landscape Character Assessment Guidance. Countryside Agency and Scottish Natural Heritage. 2002.

2.2 The published Guidelines on Landscape and Visual Impact Assessment [3] tackle the subject of sensitivity at some length, but do not deal specifically with the topic of landscape capacity. It is, however, clear that there is much common ground between the thinking that is emerging on landscape sensitivity and capacity in Landscape Character Assessment work and the approach that is taken in Britain to Landscape and Visual Impact Assessment. It is therefore particularly important to understand the links between the two and to try, as far as possible, to achieve consistency in the approaches used and particularly in the terms and definitions used. On the other hand it must also be recognised that LCA and LVIA are not the same processes and there must also be clarity about the differences between them.

3. CONCEPTS OF SENSITIVITY AND CAPACITY

3.1 The terms sensitivity and capacity are often used more or less interchangeably. Others treat them as opposites, in the sense that low sensitivity is taken to mean high capacity and vice versa. Indeed the earlier versions of the Landscape Character Assessment guidance used the term sensitivity in the definition given above but this was changed to capacity in the published version to avoid confusion with the guidance on landscape and visual impact assessment. However, as experience of the issues involved has developed, it has become clearer that the two are not the same and are not necessarily directly related. A clearer distinction therefore needs to be drawn between them. Definitions vary among those actively engaged in this work and opinions vary about the acceptability and utility of different definitions. The box below contains just two examples of current ideas of sensitivity, in the words of the authors.

Box 2 : Examples of definitions of landscape sensitivity in current use

"Landscape sensitivity... relates to the stability of character, the degree to which that character is robust enough to continue and to be able to recuperate from loss or damage. A landscape with a character of high sensitivity is one that, once lost, would be difficult to restore; a character that, if valued, must be afforded particular care and consideration in order for it to survive."

The model for analysing landscape character sensitivity is based on the following assumptions:

- i) Within each landscape type certain attributes may play a more significant role than others in defining the character of that landscape.
- ii) Within each landscape type, certain attributes may be more vulnerable to change than others.
- iii) Within each landscape type, the degree to which different attributes are replaceable, or may be restored, may vary.

- iv) The condition of the landscape - the degree to which the described character of a particular landscape type is actually present 'on the ground' - will vary within a given area of that landscape type.

By being able to appreciate and assess the significance, vulnerability and replaceability of different attributes, the relative stability or resilience of the various attributes within given landscape types can be assessed. Then, taking into account condition, or representation of character, the sensitivity of a particular area of landscape can be determined.

Chris Bray. Worcestershire County Council. Unpublished paper on a County Wide Assessment of Landscape Sensitivity. 2003.

Landscape sensitivity... is a property of a thing that can be described and assessed. It signifies something about the behaviour of a system subjected to pressures or stimuli. One system, when stimulated might be robust and insensitive to the pressure, whilst another may be easily perturbed. The system might also be thought of in a dynamic way - the pressure could send the system off into a new state or the system might be resilient and bounce back rapidly and be relatively insensitive to disturbance. Sensitivity is related here to landscape character and how vulnerable this is to change. In this project change relates to wind energy development and any findings on landscape sensitivity are restricted to this (landscapes may have different sensitivities to other forms of change or development). Landscapes which are highly sensitive are at risk of having their key characteristics fundamentally altered by development, leading to a change to a different landscape character i.e. one with a different set of key characteristics. Sensitivity is assessed by considering the physical characteristics and the perceptual characteristics of landscapes in the light of particular forms of development.

John Benson et al. University of Newcastle. Landscape Capacity Study for Wind Energy Development in the Western Isles. Report commissioned by Scottish Natural Heritage for the Western Isles Alternative Renewable Energy Project. 2003

3.2 These two examples highlight one of the main debates about landscape sensitivity, namely whether it is realistic to consider landscapes to be inherently sensitive or whether they can only be sensitive to a specific external pressure. This paper argues that both are valid and useful in different circumstances. Looking at the way that the word sensitivity is used in other contexts, for example in describing the character of people, it is common and seems quite acceptable to describe someone as 'a sensitive person', without necessarily specifying what they are sensitive to. Landscape can quite reasonably be treated in the same way.

3.3 There is a greater degree of agreement about definitions of capacity with broad acceptance that it is concerned with the amount of change or pressure that can be accommodated. There is therefore a quantitative dimension to it and it needs to reflect the idea of the limits to acceptable change. The main debate here is about whether aspects of landscape value should or should not be incorporated into considerations of capacity. In general there appears to be some acceptance that it should, although some argue that this is a retrograde step and could lead to an over reliance on existing designations, which is widely recognised as an overly simplistic approach. There is also some disagreement about where visual aspects should be considered, whether as a component of landscape sensitivity, or wholly as a contributor to landscape capacity, or both.

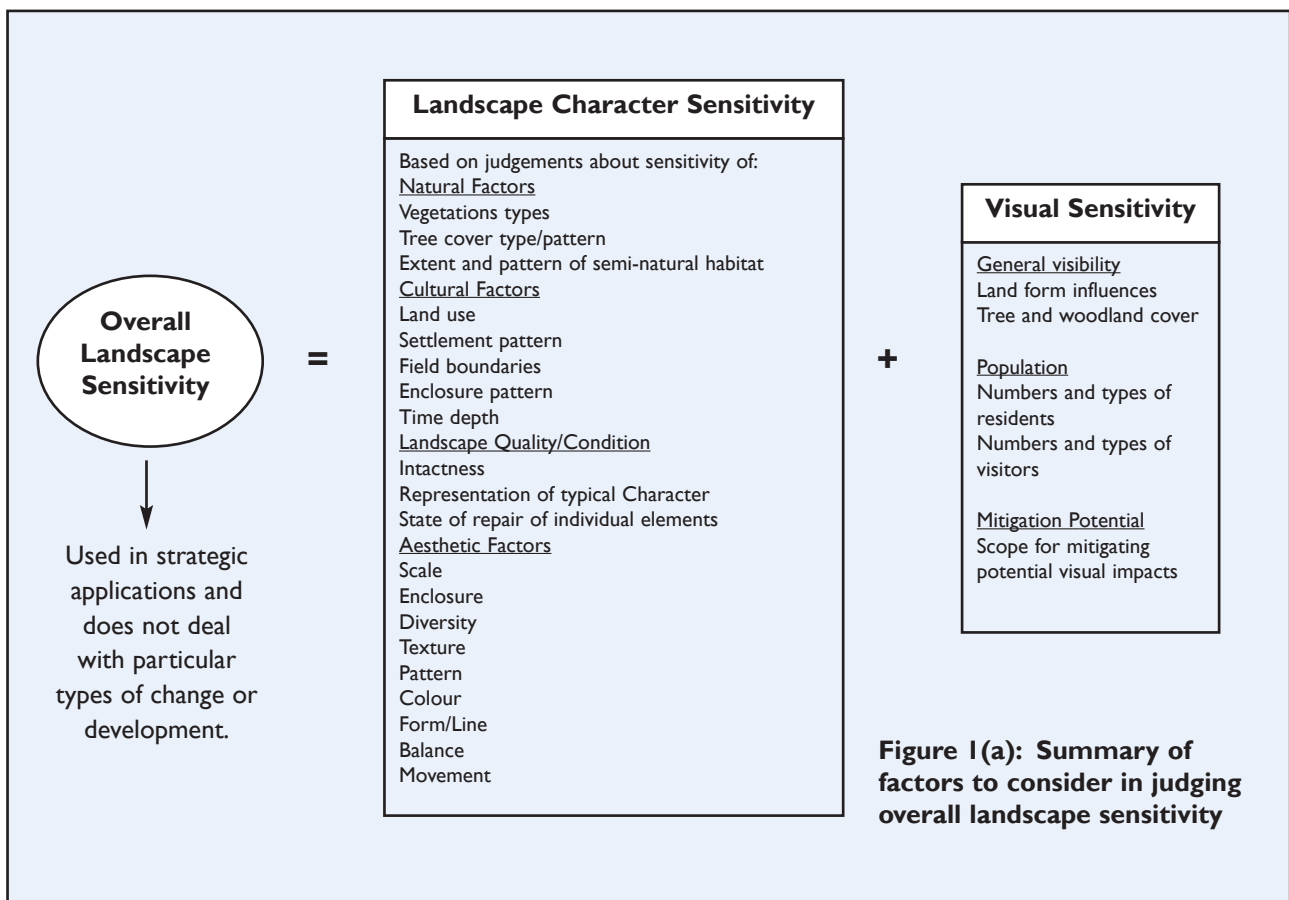
3.4 In this paper an attempt has been made to weigh up the different arguments and as a result it is suggested that three terms can usefully be adopted as shown below. Further details of the definition and use of these terms are in the later sections of this paper.

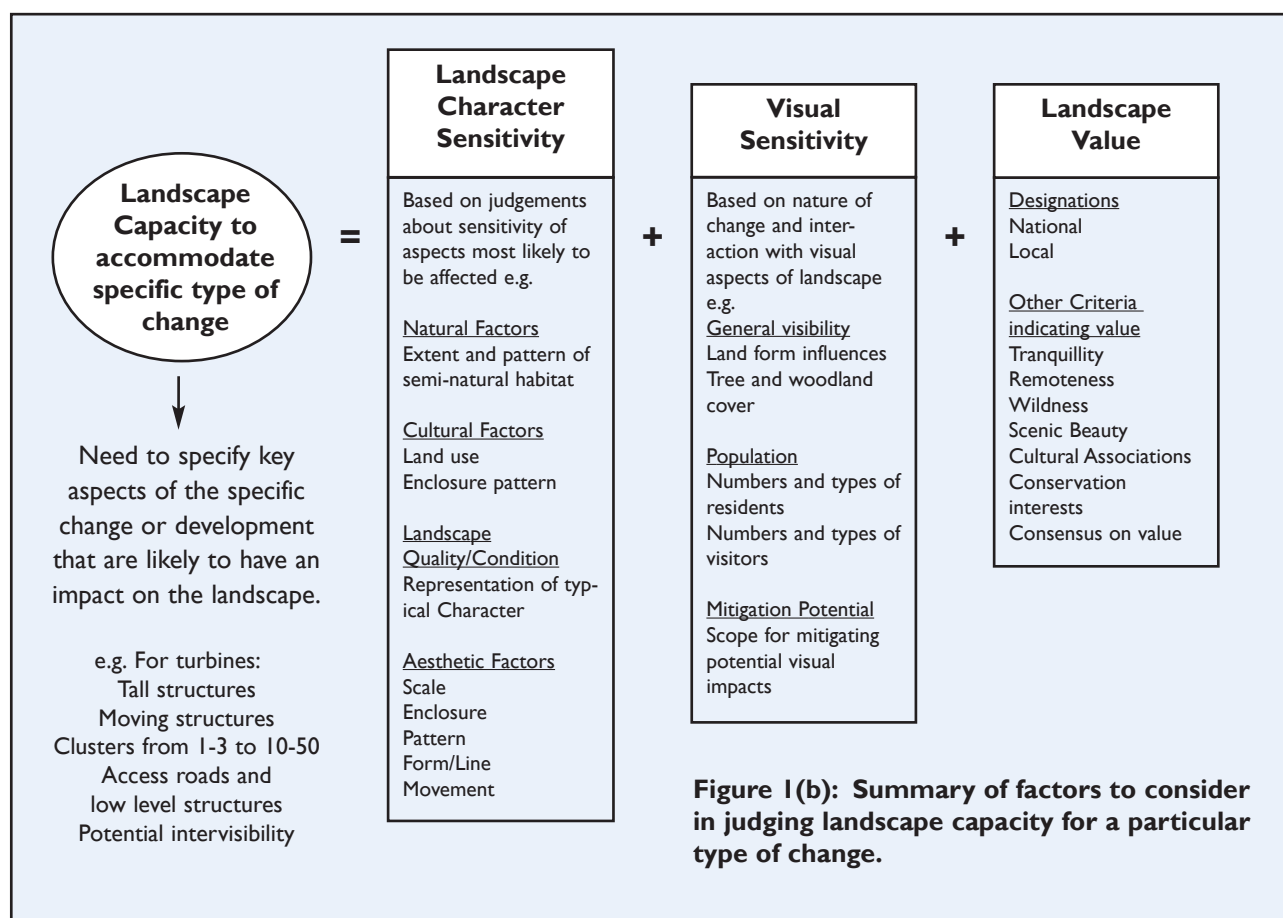
- i) **Overall landscape sensitivity:** This term should be used to refer primarily to the inherent sensitivity of the landscape itself, irrespective of the type of change that may be under consideration. It is likely to be most relevant in work at the strategic level, for example in preparation of regional and sub-regional spatial strategies.

Relating it to the definitions used in Landscape and Visual Impact Assessment, landscape sensitivity can be defined as embracing a combination of:

- the sensitivity of the landscape resource (in terms of both its character as a whole and the individual elements contributing to character);
 - the visual sensitivity of the landscape, assessed in terms of a combination of factors such as views, visibility, the number and nature of people perceiving the landscape and the scope to mitigate visual impact.
- ii) **Landscape sensitivity to a specific type of change:** This term should be used where it is necessary to assess the sensitivity of the landscape to a particular type of change or development. It should be defined in terms of the interactions between the landscape itself, the way that it is perceived and the particular nature of the type of change or development in question.
- iii) **Landscape capacity:** This term should be used to describe the ability of a landscape to accommodate different amounts of change or development of a specific type. This should reflect:
- the inherent sensitivity of the landscape itself, but more specifically its sensitivity to the particular type of development in question, as in (i) and (ii). This means that capacity will reflect both the sensitivity of the landscape resource and its visual sensitivity;
 - the value attached to the landscape or to specific elements in it.

The meanings of these terms and the types of factors that need to be considered in each case are summarised in Figure 1 (a) and (b).





3.5 The implication of this is that capacity studies must be specific to a particular type of change or development. At a strategic level, for example in work relating to regional and sub-regional spatial strategies, this means that it might be appropriate to produce a single map of general landscape sensitivity. Maps of landscape capacity, however, need to be specific so that, for example, a map showing an assessment of wind turbine capacity could be produced but would almost certainly be different from a map showing capacity for housing development or for new woodland and forestry planting. Some capacity studies are very specific in their purpose, seeking for example to assess capacity to accommodate a 1000 home settlement at a particular density of development.

4. JUDGING OVERALL LANDSCAPE SENSITIVITY

4.1 In making judgements about the overall landscape sensitivity of different landscape types or areas, without reference to any specific change or type of development (for example in work relating to regional and sub-regional spatial strategies), careful consideration needs to be given to two aspects:

- Judging the sensitivity of the landscape as a whole, in terms of its overall character, its quality and condition, the aesthetic aspects of its character, and also the sensitivity of individual elements contributing to the landscape. This can be usefully referred to as **landscape character sensitivity**;
- Judging the **visual sensitivity** of the landscape, in terms of its general visibility and the potential scope to mitigate the visual effects of any change that might take place. Visibility will be a function particularly of the landform of a particular type of landscape and of the presence of potentially screening land cover, especially trees and woodland. It will also be a reflection of the numbers of people who are likely to perceive the landscape and any changes that occur in it, whether they are residents or visitors.

Landscape character sensitivity

4.2 Judging landscape character sensitivity requires professional judgement about the degree to which the landscape in question is robust, in that it is able to accommodate change without adverse impacts on character. This means

making decisions about whether or not significant characteristic elements of the landscape will be liable to loss through disturbance, whether or not they could easily be restored, and whether important aesthetic aspects of character will be liable to change. Equally, consideration must be given to the addition of new elements, which may also have a significant influence on character. These decisions need clear and consistent thought about three factors:

- the individual elements that contribute to character, their significance and their vulnerability to change;
- the overall quality and condition of the landscape in terms of its intactness, representation of typical character and condition or state of repair of individual elements contributing to character;
- the aesthetic aspects of landscape character, noting that in Scotland these are usually referred to as the 'landscape experience' or the 'scenic qualities' of the landscape. As indicated in the LCA Guidance, aesthetic factors/scenic qualities can still be "recorded in a rational, rigorous and standardised, if not wholly objective way". They include for example the scale, level of enclosure, diversity, colour, form, line, pattern and texture of the landscape. All of these aesthetic dimensions of landscape character may have significance for judgements about sensitivity. They are also distinct from the perceptual aspects of landscape character, which are much more subjective and where responses to them will be more personal and coloured by the experience and the preferences of the individual. These are also important dimensions of character and influence the ability of landscapes to accommodate change but they are best dealt with as part of the consideration of value to be incorporated in the final step of assessing capacity, as discussed in **Section 7**.

4.3 Different methods have been used to judge landscape character sensitivity in recent work. Each has its merits and it is not the role of this topic paper to advocate one approach or another. There is also much common ground between them and they are not therefore alternatives but rather different explorations of a similar approach. A common feature of these approaches in England is the analysis of landscape character in terms of firstly the natural and ecological, and secondly the cultural attributes of the landscape. Landscape sensitivity is in these cases equated broadly with ideas of ecological and cultural sensitivity and deliberately does not embrace either aesthetic aspects of character or visual sensitivity. Three recent examples illustrating this approach are summarised in Boxes 3 and 4.

4.4 There are few if any examples of studies of overall landscape sensitivity that incorporate assessment of the aesthetic dimensions of landscape character, although it would be technically possible to do this. Such considerations are more likely to be found in studies of sensitivity to particular forms of change or development and are discussed in **Section 5**.

Box 3: An approach based on ecological and cultural sensitivity

The Countryside Agency's work on traffic impacts on the landscape required a desk based rather than a field assessment using Staffordshire as the test area. The main concern was with the impact of the road network on landscape character. The Countryside Agency's National Landscape Character Types, and the Land Description Units (LDUs) on which they are based, both derived from the National Landscape Typology, were used as reporting units. The attribute maps from the national typology also provided much of the source data for the analysis. In this work landscape sensitivity is defined as the degree to which the character of the landscape is likely to be adversely affected or changed by traffic levels and network use. It is considered to consist of a combination of ecological sensitivity and cultural sensitivity where:

- **ecological sensitivity** is based on identification of areas where there are ecologically significant habitats likely to be at risk, reflecting combinations of agricultural potential, related to ground type, together with agricultural use and woodland pattern;
- **cultural sensitivity** is based on identification of areas where culturally significant elements of the landscape will be at risk, reflecting a combination of settlement pattern, land cover and the origins of the landscape in terms of whether it is 'planned' or 'organic'.

These two aspects of sensitivity are mapped using GIS and combined into an overall sensitivity matrix. Data on

the road hierarchy and road 'windy-ness' was then combined with the sensitivity classes to give an overall assessment. This desk study proves successful in highlighting areas of concern that could then be examined in more detail if required.

Babtie Group and Mark Diacono. Assessing Traffic Impacts on the Countryside. Unpublished Report to the Countryside Agency. 2003.

Box 4 : Approaches based on vulnerability, tolerance and resilience to change

Work carried out recently for structure plan purposes by Herefordshire and Worcestershire County Councils working in partnership, focuses on landscape character sensitivity rather than visual sensitivity. The work is at the detailed level of Land Description Units (the constituent parts or building blocks of Landscape Character Types and Areas). These studies also focus on individual landscape indicators and attributes - meaning the factors that contribute to character, grouped together under the headings of ground vegetation, land use, field boundaries, tree cover character, tree cover pattern, enclosure pattern, settlement pattern, spatial character and additional characteristic features, such as parkland or rivers.

These studies use a combination of several different aspects of the character of the landscape to reach an assessment of overall sensitivity, based on analysis of these attributes. The definitions of the component parts can be summarised as follows:

Vulnerability: This is a measure of the significance of the attributes that define character, in relation to the likelihood of their loss or demise. This combines assessment of the significance of an attribute with assessment of its functionality and of the likelihood of future change based on apparent trends.

Tolerance: This can be defined as the degree to which change is likely to cause irreparable damage to the essential components that contribute to landscape character. It is a measure of the impacts on character of the loss of attributes, reflecting the timescale needed for their contribution to character to be restored. This combines assessment of the replaceability of individual attributes with their overall significance in the landscape and also takes account of the potential for future change based on apparent trends.

Resilience: This combines tolerance with vulnerability to change. It is a measure of the endurance of landscape character, representing the likelihood of change in relation to the degree to which the landscape is able to tolerate that change.

Sensitivity: Relates to the resilience of a particular area of landscape to its condition.

Each of these aspects of sensitivity is assessed from a combination of desk and fieldwork. The assessments of each factor are then progressively combined in pairs using matrices, until the final assessment of individual areas emerges. In general three point numerical scores are used to combine the various aspects in pairs.

The published Herefordshire work focuses on landscape resilience, which is mapped for landscape types and forms the key summary map in the published Supplementary Planning Guidance document, leaving a final assessment of sensitivity to a more detailed stage based on individual land cover parcels, which is the fine grain at which condition has been assessed in this work. The Worcestershire work is not yet published but will take a similar approach once the County survey of condition has been completed.

Worcestershire County Council. Unpublished paper on a County Wide Assessment of Landscape Sensitivity. 2003.
Herefordshire Council. Landscape Character Assessment. Supplementary Planning Guidance. 2002.

Visual sensitivity

4.5 In a comprehensive study of landscape sensitivity account would ideally also be taken of the visual sensitivity of the landscape. This requires careful thinking about the way that people see the landscape. This depends on:

- the probability of change in the landscape being highly visible, based particularly on the nature of the landform and the extent of tree cover both of which have a major bearing on visibility;
- the numbers of people likely to perceive any changes and their reasons for being in the landscape, for example as residents, as residents staying in the area, as travellers passing through, as visitors engaged in recreation or as people working there;
- the likelihood that change could be mitigated, without the mitigation measures in themselves having an adverse effect (for example, planting trees to screen development in an open, upland landscape could have as great an effect as the development itself).

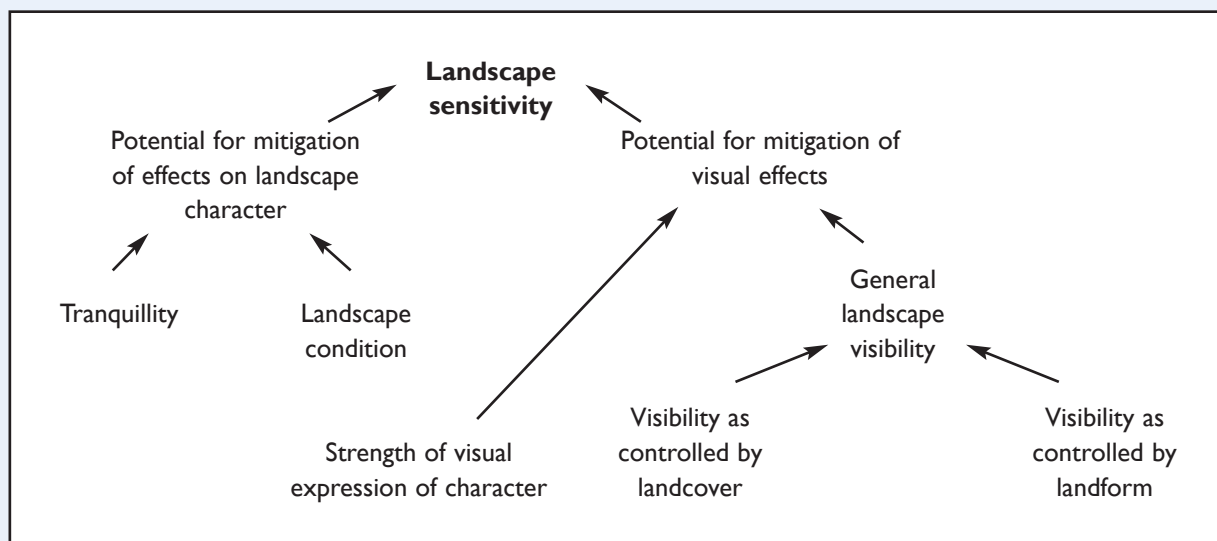
4.6 In practice visual sensitivity can be difficult to judge without reference to a specific form of change or development and that is no doubt why there are few examples of strategic assessments that incorporate this dimension. Herefordshire and Worcestershire initially intended to incorporate such considerations into their strategic work but abandoned the attempt on the basis that it was more realistically considered for specific proposed developments or change. Work by Staffordshire County Council does, however, provide a working example of an approach that combines judgements about landscape character sensitivity (as outlined above) with consideration of the issue of visual sensitivity. It is summarised in **Box 5**.

Box 5: Staffordshire County - An approach that combines landscape character sensitivity and visual sensitivity

Work carried out by Staffordshire County Council, published as Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan, approaches landscape sensitivity by working at the Land Description Unit level and addressing the three aspects of landscape character listed below. In this work the first stage in addressing landscape sensitivity is to consider the quality (as defined in the LCA guidance, meaning condition and expression of typical character in specific areas) of individual areas of landscape in relation to their character. This is achieved by asking a series of questions about the three aspects of character:

- **Visual aspects**, dealing with the spatial distribution, pattern and condition of landscape elements. The questions cover: the presence of characteristic features for the landscape type; the absence of incongruous features for the type; and the visual and functional condition of the elements contributing to character of that particular type.
- **Cultural aspects**, which are determined by the history of human activity and are reflected in the patterns of settlement, land use, field enclosure and communications. The questions cover: demonstration of a clear and consistent pattern of landscape elements resulting from a particular course of historical development contributing to character; and the extent to which the area exhibits chronological continuity or 'time depth' in the landscape.
- **Ecological aspects**, relating to the pattern and extent of survival of the typical semi-natural vegetation and related fauna. The questions cover the presence and frequency of semi-natural vegetation characteristic of the landscape type; and the degree of fragmentation and the pattern of the semi-natural habitats.

The Staffordshire approach notes the strong relationship between the quality and sensitivity of the landscape in that one of the effects of disturbance can be the removal of characteristic landscape features. In dealing with the potential impacts of change on landscape character it asks how likely it is that significant features or characteristics of the landscape that contribute to its quality will be lost through disturbance. It also asks whether perception of landscape quality will be adversely affected.



The Staffordshire example is one of the few cases where landscape character sensitivity and visual sensitivity have been combined in an integrated approach. In terms of visual impact this work asks two questions:

- How likely is it that the effects of a given amount of disturbance will be visible?
- What is the potential for negating or minimising adverse visual impacts of disturbance through mitigation and compensation measures?

The idea of general visibility is used and is defined in terms of the likelihood that a given feature, randomly located, will be visible from a given viewpoint, also randomly located. It was determined in this case by theoretical and field based analysis of landform and tree and woodland cover and the way that they interact.

All these different factors, relating to both landscape character sensitivity and visual sensitivity are then combined by judging each on a 5 level scale and combining them sequentially, in map form, through the use of GIS, to produce a final map of landscape sensitivity.

Staffordshire County Council 1999. Planning for Landscape Change. Supplementary Planning Guidance to the Stoke on Trent and Staffordshire Structure Plan. 1996-2011

5. JUDGING LANDSCAPE SENSITIVITY TO A SPECIFIC TYPE OF CHANGE

5.1 In many studies judgements must be made about the ability of the landscape to accommodate particular types of change or development. This is where sensitivity and capacity are most often used interchangeably but it is suggested that, in line with the definitions set out above, sensitivity is the most appropriate word to use. When judging how sensitive a landscape is to some specified type of change it is essential to think in an integrated way about:

- The exact form and nature of the change that is proposed to take place;
- The particular aspects of the landscape likely to be affected by the change, including aspects of both landscape character sensitivity and visual sensitivity, as described in **Section 4**.

5.2 Understanding the nature of the agent of change is like specifying or describing the development project in an Environmental Impact Assessment, except that it is a generic rather than a project-specific form of change. The focus must be on identifying key aspects of the change that are likely to affect the landscape.

5.3 Defining the particular aspects of the character of the landscape that are likely to be affected by a particular type of change (landscape character sensitivity) means careful analysis of the potential interactions. These might include: impacts upon particular aspects of landscape character including landform, land cover, enclosure and settlement pattern; and impacts on aesthetic aspects such as the scale, pattern, movement and complexity of the landscape. In Scotland, for example, the wide range of capacity studies that have been carried out, although varying in their approach, usually incorporate consideration of the key physical, natural and cultural characteristics of the landscape, but also take into account the aesthetic/scenic dimensions of the landscape in judgements about the ability of different landscapes to accommodate change. So, for example, the Stirling Landscape Character Assessment, which includes consideration of a locational strategy for new development, includes criteria related to the 'landscape experience'. It considers that scale, openness, diversity, form and or line, and pattern are the most relevant aspects for this task (see **Box 6** in Section 7 for fuller examples).

5.4 Similarly the visual sensitivity of the landscape with respect to the specific type of change or development needs to be assessed. This means that the potential visibility of the development must be considered, together with the number of people of different types who are likely to see it and the scope to modify visual impacts by various appropriate forms of mitigation measures.

5.5 An overall assessment of sensitivity to the specific form of change or development requires that the four sets of considerations summarised above should be brought together so that the sensitivity of individual types or areas of landscape to that particular form of development can be judged and mapped. They are:

- impacts upon particular aspects of landscape character including landform, land cover, enclosure and settlement pattern;
- impacts on aesthetic aspects such as the scale, pattern, movement and complexity of the landscape;
- potential visibility of the development and the number of people of different types who are likely to see it;
- scope to modify visual impacts by various appropriate forms of mitigation measures.

In most cases, this is likely to be a precursor to further judgements about capacity. Studies specifically of sensitivity to a particular type of development, without proceeding to an assessment of capacity, are not likely to be common.

5.6 The outcome of a study of landscape sensitivity to a specific type of change or development would usually be a map of different categories of sensitivity, usually with either three (for example low, medium and high) or five (for example very low, low, medium, high, very high) categories of sensitivity. Such a map provides an overview of areas where there is relatively low sensitivity to the particular type of change or development but does not indicate whether and to what extent such change or development would be acceptable in these areas. This requires consideration of other factors and is best tackled through a landscape capacity study.

BOX 5: South West Region Renewable Energy Strategy - an example of using landscape sensitivity to forms of renewable energy development to inform draft targets

This is a consultant's study, carried out by Land Use Consultants for the Government Office for the South West. It focussed on providing information on the sensitivity of different landscape character areas to wind turbines but also assessed whether a similar approach could be used for biomass crops. Key features of this work, which is still in progress, are:

- It is a strategic study of landscape sensitivity to a specific type of change/development. The Countryside Character Area framework is adopted as suited to the needs of regional scale work, though there has also been subsequent discussion of the scope to use the new National Landscape Typology to provide a more refined level of assessment.
- A range of attributes contributing to landscape character are identified as likely to indicate suitability to accommodate wind turbines. Scale and form of the landscape, landscape pattern, settlement pattern and

- A shorter list of attributes is considered to indicate suitability of a landscape to accommodate biomass crops. They are: landscape pattern, land cover/land use, sense of enclosure and settlement pattern/transport network.
- Using these attributes, a series of sensitivity classes are defined in relation to both wind turbines and biomass crops. In each case a five level verbal scale of sensitivity is used - low, moderate/low, moderate, moderate/high and high.
- For each level of sensitivity the influence of the landscape attributes in relation to that type of development is summarised. For example, landscapes judged to be of low sensitivity to wind turbines are "likely to have strong landform, a strong sense of enclosure that reduces visual sensitivity, to be already affected by man made features, to have reduced tranquillity, little inter-visibility with adjacent landscapes and a low density of sensitive landscape features. Similarly, for biomass crops, areas of high sensitivity are defined as those where monocultures of biomass crops would prejudice landscape pattern, where transport infrastructure is dominated by narrow rural lanes (or is absent), and where buildings are uncharacteristic of the landscape (e.g. moorland). The scale of possible wind turbine development is considered, predominantly in relation to landform scale, though it is acknowledged that at more detailed levels of assessment other factors such as landscape pattern and enclosure will also be relevant.

Countrywide Character Areas wholly within the South West Region

104 South Herefordshire and Over Severn	111 Bidcombe Vale and the Vale of Wardour	165 Exmoor
105 Forest of Dean and Lower Wye	116 Dorset Downs and Cranborne Chase	166 Vale of Taunton and Quantock Fringes
106 Severn and Avon Valleys	117 Dorset Heaths	167 Blackdowns
107 Cornwall	118 South Purbeck	168 Dorset Redlands
108 Upper Thames Clay Valleys	119 Isle of Portland	169 The Culm
109 Malvern Ridge	120 Wymouth Lowlands	170 Dartmoor
110 Berkshires and Marlborough Downs	121 Marshwood and Pannierstock Valleys	171 South Devon
111 Avon Vale	122 Yeovil Scaplands	172 Cornish Kyles
112 Bristol, Avon Valleys and Ridges	123 Hamlyn Hills	173 Budleigh Meor
113 Hampshire Downs	124 Somerset Levels and Moors	174 Henslow
114 New Forest	125 Mid Somerset Hills	175 Cammerells
115 Salisbury Plain and West Wiltshire Downs	126 Quantock Hills	176 West Penwith
		177 The Lizard
		178 Isles of Scilly

Key

- County boundary
- Low
- Moderate - low
- Moderate
- Moderate - high
- High

Scale

0 20 40 60 Kilometres

Source

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6. JUDGING LANDSCAPE CAPACITY

6.1 Turning a sensitivity study into an assessment of capacity to accommodate a particular type of change means taking a further step. The assessment of the sensitivity of different types or areas of landscape to the type of change in question must be combined with an assessment of the more subjective, experiential or perceptual aspects of the landscape and of the value attached to the landscape. There are, perhaps inevitably, some reservations amongst practitioners about the incorporation of value in work on landscape sensitivity and capacity because this is seen as the return to the now largely discredited thinking about landscape evaluation. It cannot be denied, however, that society does value certain landscapes for a variety of different reasons and this has, in some way, to be reflected in decision making about capacity to accept change.

6.2 As the Landscape Character Assessment guidance indicates (**Paragraph 9.5**), value may be formally recognised through the application of some form of national landscape designation. Where this is the case the implications of the designation need to be taken into account. This means, in particular, understanding what aspects of the landscape led to its designation and how these might be affected by the proposed change. The consultation draft of Planning Policy Statement 7, which is due to replace Planning Policy Guidance Note 7, requires that Local Planning Authorities no longer refer to local landscape designations in Development Plans. Local landscape designations are proposed to be replaced by criteria-based policies, underpinned by robust Landscape Character Assessments.

6.3 The absence of designation does not mean that landscapes are not valued by different communities of interest. This means that in such cases other indicators of value will need to be considered to help in thinking about capacity. Judgements about value in such cases may be based on two main approaches. One is to address value by means of the Quality of Life Assessment approach, seeking to address the question of 'What Matters and Why?' (see Topic Paper 2 - 'Links to Other Sustainability Tools'). In this approach value will be judged in an integrated way, with considerations of landscape and sense of place set alongside other matters such as biodiversity, historic and cultural aspects, access and broader social, economic and environmental benefits.

6.4 Alternatively judgements can be made in terms of the relative value attached to different landscapes by a range of different communities of interest. This can be based on the range of criteria set out in the Landscape Character Assessment guidance (**Paragraphs 7.8 and 7.22**). These include landscape quality and condition; perceptual aspects such as scenic beauty, tranquillity, rurality, remoteness or wildness; special cultural associations; the presence and influence of other conservation interests. There may also be a long established consensus about the importance of particular areas. Weighing up all these factors may allow the relative value of particular landscapes to be assessed as an input to judgements about capacity.

6.5 Reaching conclusions about capacity means making a judgement about the amount of change of a particular type that can be accommodated without having unacceptable adverse effects on the character of the landscape, or the way that it is perceived, and without compromising the values attached to it. This step must clearly recognise that a valued landscape, whether nationally designated or not, does not automatically, and by definition, have high sensitivity. Similarly and as already argued in Section 3, landscapes with high sensitivity do not automatically have no, or low capacity to accommodate change, and landscapes of low sensitivity do not automatically have high capacity to accept change. Capacity is all a question of the interaction between the sensitivity of the landscape, the type and amount of change, and the way that the landscape is valued.

6.6 It is entirely possible for a valued landscape to be relatively insensitive to the particular type of development in question because of both the characteristics of the landscape itself and the nature of the development. It may also be the case that the reasons why value is attached to the landscape are not compromised by the particular form of change. Such a landscape may therefore have some capacity to accommodate change, especially if the appropriate, and hopefully standard, steps are taken in terms of siting, layout and design of the change or development in question. For example, a capacity study may show that a certain specified amount of appropriately located and well-designed housing may be quite acceptable even in a highly valued and moderately sensitive landscape. This is why capacity is such a complex issue and why most capacity studies need to be accompanied by guidelines about the ways in which certain types of change or development can best be accommodated without unacceptable adverse effects.

6.7 Clearly at this stage of making judgements about capacity there can be considerable benefit in involving a wide range of stakeholders in the discussions since there is likely to be a strong political dimension to such judgements. On the other hand clear and transparent arguments are vital if decisions are to be well founded and this is where well constructed professional judgements about both sensitivity and capacity are extremely important.

6.8 In Scotland a wide range of capacity studies have been carried out to look at the ability of different areas to accept development of different types. They have covered housing and built development in general, as well as wind turbines and aquaculture. The detailed approach taken varies as the studies have been carried out by different individuals or consultancies working to different briefs for different clients. Box 6 contains a summary of the approach taken in a recent example.

BOX 6 : Stirling Landscape Capacity Assessment for Housing and Small-scale Industrial, Retail and Business Development

Carried out by David Tyldesley Associates for Scottish Natural Heritage and Stirling Council in 1999, this study seeks to ensure that development around Stirling is directed towards those landscapes which can best accommodate it. The work developed an approach pioneered at St Andrews in 1996 and also ran in parallel with a settlement capacity evaluation in the neighbouring area of Clackmannanshire. The Stirling study assessed 15 specific locations of settlements and their settings and three larger general areas of search. The purpose of the study was to define: settlements and areas of high landscape sensitivity judged to have little capacity to accommodate growth; settlements and areas judged to be able to accommodate minor growth and settlements or areas judged to be suitable for major settlement expansion or new settlement. The work assumed that the buildings in question would be well-designed and would use traditional building techniques and materials. It also assumed that it would include a strong framework of structural landscape treatment including ground modelling where appropriate and tree planting of appropriate scale, area, design and species composition to ensure that the development achieves a good fit in the landscape. This study embraces both sensitivity and capacity, as defined in this Topic Paper, although they are not separately considered. The assessment is clearly made with respect to particular specified forms of development. The assessment is based on five criteria which are applied to the landscape types previously identified in a Landscape Character Assessment. The five criteria address aspects of Landscape Character Sensitivity, Visual Sensitivity and Landscape Value, as discussed in this topic paper. The criteria are derived from the key characteristics and features of the landscape character types and can be grouped as follows in relation to the structure of this Topic paper:

Related to Landscape Character Sensitivity

Effects on the Landscape Resource: examines the effects of development on the key physical features and characteristics and judges whether that development of the kind described could be accommodated and whether the character of the landscape would be sustained, enhanced or diminished. Only the important characteristics relevant to the type of development are assessed.

Effects on the landscape experience: assesses the potential effects of development on aspects of landscape experience relating to scale, openness, diversity, form and/or line and pattern and makes an overall assessment of whether these aspects would be affected positively or negatively.

Related to Visual Sensitivity

Visual effects: considers possible visual effects of the forms of development on: views and approaches to the settlements from the principal approach roads; possible effects on strategically significant outward views from the settlements; potential effects on distinctive skylines; and potential effects on visually conspicuous locations such as open, flat ground or open, high or rising ground.

Mitigation: considers whether the development would require long-term mitigation to reduce the effects of the development. It also considers how feasible any desirable mitigation would be and whether the mitigation itself would be appropriate.

Related to Landscape Value

Other Important Effects: considers whether the development would affect the integrity of an important designed landscape or its setting and whether the development would affect the amenity of other important cultural or historical elements or features of the landscape, including their settings.

The criteria under these five categories are applied systematically to each settlement and area of search in terms of the different landscape character types that occur. Professional judgments are made and for each criteria a three point graphical scale is used to express the findings. An overview is taken of the judgments for each of the criteria for each landscape type, and an overview assessment is made of the whole. The three point scale applied to each criteria covers: no impact or positive enhancement; neutral or average effect; and significant negative effect or diminishing of landscape character. An overall judgment is then made based on the profile of the area/settlements and relevant landscape type based on a table of judgments under each criteria.

David Tyldesley Associates. Stirling Landscape Character Assessment. Report for Scottish Natural Heritage and Stirling Council. 1999

7. RECORDING AND PRESENTING INFORMATION

7.1 Approaches to judging sensitivity and capacity can be made at different levels of detail. Much depends on the time and resources available and on the problem to be addressed. For example, capacity studies for housing may need a finer grain of assessment because of the particular nature of the development. Where time and resources are limited quick assessments are needed and it is likely that overall judgements will need to be made about the whole of a landscape type or area without necessarily making individual assessments of the constituent aspects of sensitivity or capacity. Consultants working to tight timescales and with limited budgets often carry out short sharp studies of this type. In such cases it is rarely possible to assess each of the relevant factors individually in great detail and the emphasis is often on overall judgement of sensitivity. It is nevertheless still extremely important that the thinking that underpins these judgements is clear and consistent, that records of the field judgements are kept in a consistent form and that the decisions reached can be explained easily to an audience of non-experts.

7.2 Local authorities carrying out such work in house are likely to work in a different way and may sometimes have longer periods of time for desk study, survey and analysis. Permanent staff can be more fully involved in such studies and have a greater opportunity to become familiar with and to understand their landscapes and to develop real ownership of the work. In these cases it may be possible to take a much more detailed and transparent step-by-step approach to assembling the judgements that ultimately leads to an overall assessment of landscape sensitivity or capacity. The Staffordshire, Worcestershire and Herefordshire studies, for example, provide demonstrations of what can be achieved by officers working on assessing their own areas, often over a reasonably long period of time.

7.3 Whoever carries them out, all assessments of sensitivity and capacity inevitably rely primarily on professional judgements, although wherever practically possible they should also include input from stakeholders. The temptation to suggest objectivity in such professional judgements, by resorting to quantitative methods of recording them is generally to be avoided. Nevertheless dealing with such a wide range of factors, as outlined in the paragraphs above, does usually require some sort of codification of the judgements that are made at each stage as well as a way of combining layers of judgements together to arrive at a final conclusion.

7.4 The first step is to decide on the factors or criteria that are to be used in making the judgement and to prepare a clear summary of what they are and what they mean. The second step is to design record sheets that

allow the different judgements that need to be made to be recorded clearly, whether they are to be based on desk study or field survey. The time and resources available will influence the level of detail of this record sheet and the level of detail required of the work. Ideally separate records should be made of each component aspect of the final judgement. So for example in the case of a comprehensive capacity study for a particular type of change or development, a record should be made of the judgements made about:

- i) **the Landscape Character Sensitivity** of each landscape type or area to that type of change, which will reflect the sensitivity of individual aspects of landscape character including landform, land cover, enclosure form and pattern, tree cover, settlement form and pattern, and other characteristic elements, and the aesthetic aspects of landscape character, including for example, its scale, complexity, and diversity;
- ii) **the Visual Sensitivity** to that type of change, which will reflect, for each landscape type or area; general visibility, influenced by landform and tree and woodland cover, the presence and size of populations of different types, and potential for mitigation of visual impacts, without the mitigation in itself causing unacceptable effects.
- iii) the **Value** attached to each landscape, which will reflect:
 - national designations based on landscape value;
 - other judgements about value based either on a 'Quality of Life Assessment', or on consideration of a range of appropriate criteria relating to landscape value.

7.5 These different aspects need to be judged on a simple verbal scale, either of three points - high, medium or low, or of five points - for example very high, high, medium/average, low and very low, or equivalents. A three point scale is much easier to use but a five point scale allows greater differentiation between areas. These scales can easily be translated into shades or colours for graphic display and are well suited to use as layers within a GIS of the type now widely employed in landscape character work.

7.6 The question remains of how layers of information can then be combined to arrive at a final assessment of either sensitivity or capacity, depending on which is required. There are three possible methods: firstly the construction of an overall profile combined into an overall assessment of sensitivity and capacity; secondly the cumulative assessment of sensitivity and capacity by sequential combination of judgements; and thirdly a scoring approach. They are briefly outlined below.

An overall profile

7.7 In the first approach individual assessments are made of the constituent aspects of sensitivity or capacity using a three or five point verbal scale, as outlined above. The amount of detailed assessment that goes into the judgements of each of these factors will depend on the time and resources available and the overall approach taken. These assessments are arranged in a table or matrix to provide a profile of that particular landscape type or area. An overview is then taken of the distribution of the assessments of each aspect and this is used to make an informed judgement about the overall assessment of sensitivity or capacity. **Figure 2** gives a hypothetical example:

Figure 2: Building up the overall profile

Landscape Type/Area	Landscape Character Sensitivity	Sensitivity of Individual Elements	Sensitivity of Aesthetic Aspects	Visual Sensitivity	LANDSCAPE SENSITIVITY	Value of Landscape	LANDSCAPE CAPACITY
Type 1	High	Medium	Medium	High	HIGH	Low	MEDIUM
Type 2	Low	Medium	Low	Low	LOW	Low	HIGH
Type 3	High	High	High	Medium	HIGH	High	LOW
etc							

Cumulative assessment

7.8 In the second approach individual assessments are similarly made but in this case the more detailed lower-level assessments are combined in pairs sequentially until an overall assessment is reached. The number of layers combined in this way depends upon the level of detailed information collected in the survey. This must of course be done for each landscape type or area being assessed. Based on the framework and definitions set out in this paper some simplified and purely illustrative possible combinations (and there are of course others) might be:

- Sensitivity of ecological components + Sensitivity of cultural components = Landscape character sensitivity
- General visibility (related to land form and land cover) + Level and significance of populations = Visual sensitivity
- Landscape character sensitivity + Visual sensitivity = Overall landscape sensitivity
- Presence of designations + Overall assessment of value against criteria = Landscape value
- Overall landscape sensitivity + Landscape value = Landscape capacity

7.9 The difficulties with this approach are that it may be somewhat cumbersome and time consuming to apply, especially for large areas, and that decisions must be made about how the individual assessments are to be combined. So, for example, while two HIGHS clearly give a HIGH in the matrix, what about a HIGH and a MEDIUM? Is the highest level used in which case the answer is also HIGH, or is a judgement made on the combinations? There is no single answer but again the emphasis must be on transparency. **Figure 3** illustrates this process for two hypothetical combinations. Both could also be shown with a five point scale, as discussed above, to give a more refined assessment.

Landscape Character Sensitivity	High	HIGH	HIGH	HIGH
	Medium	MEDIUM	MEDIUM	HIGH
	Low	LOW	MEDIUM	HIGH
		Low	Medium	High
		Visual Sensitivity		

Figure 3(a): Combining Landscape Character Sensitivity and Visual Sensitivity to give overall Landscape Sensitivity

Landscape Sensitivity	High	MEDIUM	LOW	LOW
	Medium	MEDIUM	MEDIUM	LOW
	Low	HIGH	MEDIUM	MEDIUM
		Low	Medium	High
		Landscape Value		

Figure 3(b): Combining Landscape Sensitivity and Landscape Value to give Capacity

Scoring

7.10 In this type of approach the word scales must be combined in a consistent way with appropriate rules applied as to how the combined layers are further classified. This may require that they are converted into numerical equivalents for ease of manipulation. Shown graphically, these 'scores' will take the form of different colours or shades, which is generally preferable to presenting the numerical figures themselves. There are certainly examples of work that do take a scoring approach to the layers of information in the assessment, although they may not appear in the final published material.

7.11 While scoring overcomes the difficulty of how individual assessments of each aspect are combined (for example by multiplication within matrices and by adding different matrices) and makes the process transparent, it does lead to a greater emphasis on quantitative aspects of such work. If overemphasised as an end in itself rather than as a means to an end, numerical representation may run the risk of generating adverse reactions because it suggests something other than professional judgement and can suggest a spurious scientific rigour in the process. It was, after all, the overly quantitative nature of landscape evaluation in the 1970s that led to a move away from that approach.

The role of Geographic Information Systems

7.12 Today most sensitivity and capacity studies, whichever approach they take, are likely to rely on Geographic Information Systems (GIS) to manipulate the layers of information. This brings several advantages and notably:

- Consistency of approach, in that appropriate matrices or algorithms can be defined once and then applied consistently throughout a study;
- Transparency, in that it is easy to interrogate the base datasets used and also to visualise and communicate intermediate stages of the process if required;
- Efficiency and effectiveness in the handling of data, allowing explorations of the information and alternative approaches to combining it which would simply not be achievable in a manual paper based exercise.

8. CURRENT PRACTICE AND ISSUES IN ASSESSING SENSITIVITY AND CAPACITY

8.1 There is a wide range of work, either in progress or completed, which tackles the issues of landscape sensitivity and capacity. Most of it is quite complex and difficult to summarise meaningfully in a short paper like this and there are few if any examples as yet which demonstrate all the principles set out here. Where possible examples have been included in the boxes in the text to illustrate particular aspects of such work, including examples of overall landscape sensitivity studies carried out by local authorities, studies to assess sensitivity to particular types of change or development and capacity studies aimed, for example, at exploring wind turbines or housing, among other types of development. It is hoped that more examples may be available in future and may be included on the Countryside Character Network website (www.ccnetwork.org.uk).

Transparency and Presentation

8.2 It is clear from examination of the strategic studies of overall landscape sensitivity, such as those conducted by Herefordshire, Worcestershire and Staffordshire, that they are enormously detailed and very transparent in describing the approach to analysis and judgements. It is also apparent that they are very detailed and demanding of time and resources, and also quite complex because of the desire to explain each step in the process. However, even experienced practitioners who have not been involved in this work may struggle to understand fully the terminology used, the subtleties of the definitions and the judgements that are made at every level of the assessment, as well as the way that the different factors are combined. They may also disagree with some of those definitions - replaceability, for example, is in itself a very complex term open to different interpretations, especially when used in relation to ecological habitats. A lay audience could well be completely baffled by the complexity of the whole process. So although the arguments are logical, consistent and fully explained this can in itself open up potentially important areas of misunderstanding or debate.

8.3 On the other hand some of the consultants' studies of sensitivity and capacity are often short on transparency and rely on professional judgements, the basis of which is often not clear. It could be argued that there has to be a trade-off between complete transparency in the methods used and the accessibility of the findings to a non-specialist

audience. Reasoning must always be documented as clearly as possible and the reader of any document should be able to see where and how decisions have been made. Different content and presentation techniques may be needed to tailor the findings of studies for particular audiences. Officers of Worcestershire County Council, for example, intend ultimately to produce the findings of their overall sensitivity analysis in a more accessible form for a wider audience. The complexities in the full explanation of the method are considered necessary to provide the essential degree of transparency and justification but it is recognised that this is only likely to be suited to a specialist audience.

Continuing debates and questions

8.4 Whatever the approach adopted there are likely to be continuing debates on several questions. The main ones that require further exploration as experience grows are:

- a) Is it reasonable to make assessments of overall landscape sensitivity without considering sensitivity to a specific type of change? In what circumstances will this approach work?
- b) To what extent should considerations of 'value', as discussed in Section 6 of this paper, be taken into account in landscape capacity studies? This paper argues that they should be, provided that these considerations are clearly thought through and appropriately incorporated in the judgements that are made. Simply relying on designations is to be avoided as this is an oversimplification of complex issues but the issue remains of whether there is agreement about the way that value can be defined. At present it seems that this approach to defining capacity, by combining sensitivity and aspects of value, is reasonably well accepted in Scotland, particularly in recent wind farm capacity studies, but less so in England.
- c) How can transparency about the approach to making judgements be achieved without the explanations becoming unnecessarily complex and inaccessible?
- d) To what extent is quantification of assessments of sensitivity or capacity either necessary or desirable, as discussed in Paragraph 7.11? Both quantification and consideration of value suffer from the spectre of the 1970s approaches to landscape evaluation which hangs over them. This needs to be recognised when deciding on and presenting an appropriate approach, in order to avoid unnecessary arguments about its suitability.

Future developments

8.6 This Topic Paper is not intended to be a definitive statement about issues of landscape sensitivity and capacity. Nor is it the intention to recommend or promote a single method. This is a rapidly developing field in which practitioners are actively exploring different approaches in different circumstances. The Topic Paper may be amended in future as experience accumulates and the strengths and weaknesses of different approaches become more apparent as they are applied in practice. In the meantime comments on the content of the Topic Paper are invited to assist in this evolutionary process. The discussion forum on the Countryside Character Network website should be used for this purpose if you want to share your views with the wider practitioner community. Alternatively you can send your views by post to the coordinators of the network. Web site address and network contact details are provided in the 'Further Information' section.

ACKNOWLEDGEMENTS

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REFERENCES AND FURTHER INFORMATION

- [1] Countryside Agency (2003) *The State of The Countryside 2020*. CA 138. Countryside Agency. Cheltenham.
- [2] Scottish Natural Heritage (2001) *Natural Heritage Trends - Scotland 2001*. Scottish Natural Heritage. Battleby, Perth.
- [3] Landscape Institute and Institute of Environmental Management and Assessment (2002) *Guidelines for Landscape and Visual Impact Assessment*. Spon Press, London.

USEFUL WEBSITES

Countryside Character Network
www.ccnetwork.org.uk

Landscape Character Assessment Guidance (available on line)
www.countryside.gov.uk/LivingLandscapes/countryside_character
 or www.snh.org.uk/strategy/LCA



The full *Landscape Character Assessment: Guidance for England and Scotland* and related topic papers can be viewed and downloaded from www.countryside.gov.uk/LivingLandscapes/countryside_character and www.snh.org.uk/strategy/LCA

Free copies of the guidance are also available from:

Countryside Agency Publications
 Tel: 0870 1206466
 Fax: 0870 1206467
 Email: countryside@twoten.press.net

Scottish Natural Heritage
 Tel: 0131 446 2400
 Fax: 0131 446 2405
 Email: carolyn.dunnett@snh.gov.uk

APPENDIX – 2 – A copy of Landscape Institute Draft Technical Guidance Note 05/23
– Notes and Clarification on aspects of the GLVIA3.

Notes and Clarifications on aspects of the 3rd Edition Guidelines on Landscape and Visual Impact Assessment (GLVIA3)

This Technical Guidance Note is a draft version for consultation. Please send any feedback to GLVIA3@landscapeinstitute.org by 4th August 2023.

The final document will be published later in the year.

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1 Introduction

This Technical Guidance Note is a draft version for consultation. Please send any feedback to GLVIA3@landscapeinstitute.org by 4th August 2023.

The final document will be published later in the year.

This document provides a compilation of clarifications on the 3rd Edition Guidelines on Landscape and Visual Impact Assessment (GLVIA3). This includes:

- *Statements of clarification from 2013-2015, previously held on the Landscape Institute website;*
- *Answers provided by Landscape Institute's GLVIA Panel to questions raised during the Landscape Institute's December 2020 webinar 'GLVIA Misconceptions and Best Practice';*
- *Answers provided by the Landscape Institute's GLVIA Panel to questions raised by Members via responses to the 2021 survey about GLVIA3, and sent to the Landscape Institute Technical email address.*

This Technical Guidance Note has been produced to help interpret aspects of the guidance provided in GLVIA3, and should be read alongside GLVIA3. A description of status levels of information and guidance provided by the Landscape Institute can be found [here](#).

Any comments and feedback on GLVIA3 can be sent to technical@landscapeinstitute.org

Context

LVIA is a skill to be learned and mastered. It should always be remembered that the purpose of undertaking LVIA (or LVA) is to express clearly to decision makers the landscape professional's judgement about changes to the landscape and views. In particular, the purpose is to explain which aspects of landscape and visual change are more important to the decision to be made – and why, and which are not – and why. Achieving this outcome is more fundamental to good LVIA than the detailed mechanics of specific assessment methodologies.

Landscape and visual resources (and changes to them) are not easily measurable. Therefore, those undertaking LVIA have to proceed by a process of description, analysis and reasoning leading to assessment conclusions.

GLVIA3 is guidance aimed at experienced practitioners to ensure a degree of consistency in what is taken into account in reaching professional judgements and how they are documented. It is not a textbook to teach the inexperienced; a detailed recipe for the perfect assessment, or intended to precisely describe exactly how assessments should be undertaken and presented. Overly restrictive guidance would prevent improvement and innovation, and variation and debate are to be expected rather than discouraged.

GLVIA3 provides a structured process for assessing effects on landscape and visual resources. The responsibility of the assessor is to tailor it to the place and project under consideration, supported by an explanation of the rationale behind the approach taken.

The GLVIA Advisory Panel's view is that GLVIA3 strikes the right balance and this was reflected in the responses to the GLVIA survey in 2021¹.

¹ Responses to the GLVIA survey were: 26% agreed that GLVIA3 is fit for purpose and provides a useful framework for undertaking LVIA; 47% agreed that GLVIA3 is a useful framework for LVIA but some clarifications are required; and 27% agreed that GLVIA3 requires a re-write.

2 Errata

This section sets out errata relevant to GLVIA3.

	Error	Correction
E1	Text within Figure 5.10 ‘Scale of Significance’	In the upper box attached to ‘More significant’ the phrase <i>‘Loss of lower-value elements...’</i> should read: <i>‘Loss of higher-value elements...’</i>
E2	Typo in para 6.34 of GLVIA3	Paragraph 6.34 of GLVIA3 should read “Visual receptors likely to be less susceptible to change” rather than “ <i>Visual receptors likely to be less sensitive to change</i> ”
E3	Reference to visual susceptibility in Fig 6.1 “Judge susceptibility of visual receptor to specific change”	Reference to visual susceptibility in Fig 6.1 GLVIA3) conflicts with the approach in paragraph 6.32. Paragraph 6.32 is correct and Figure 6.1 should be amended to read “ <i>Judge susceptibility of receptor</i> ”. The susceptibility of visual receptors is not dependent on the specific change being proposed.
E4	Diagrams 5.1 and 6.1 are missing reference to geographical extent.	In GLVIA3 the narrative text in paragraphs 5.48 and 6.38 refer to geographical extent but geographical extent is missing from Diagrams 5.1 and 6.1. Geographical extent is an unintentional omission from Diagrams 5.1 and 6.1. However, there is a need for clarification as to how geographical extent is assessed and this is set out in clarifications 3(1), 5(11) and 6(8).

3 Notes and clarifications

This section is set out in the same order as GLVIA3 to aid navigation.

1. Introduction

A number of questions have been received about the scope of the guidance, the role of policy and who the guidance is for.

	Issue/ question	Advice/ clarification
1(1)	GLVIA3 and how it should be understood	Chapters 1 and 2 are introductory, setting the context in general terms and are aimed at general readers. Chapter 3 and those which follow provide advice for the landscape professional. Chapter 3 establishes the principles to which later chapters conform. Therefore if there appears to be a measure of ambiguity between something stated in Chapter 1 and Chapter 3, then the professional is encouraged to regard Chapter 3's advice as having primacy.
1(2)	Link between LVIA and policy	GLVIA3 purposefully does not refer to specific policy documents or policies because: a) The assessment process and judgements operate independently of policy. Policies will indicate how much weight could, should or may be attached to certain findings of an assessment in decision making. b) GLVIA3 applies to all nations of the UK which have different policy contexts. c) Policy changes, as referenced on page ix of the Preface to GLVIA3.
1(3)	How should the reference to policy in paragraph 5.40 (landscape susceptibility) be interpreted?	The word 'policy' used in paragraph 5.40 of GLVIA3 means general policy (and strategies) relating to landscape, for example policy objectives in AONB Management Plans that seek to conserve and enhance the AONB, or landscape policies in local plans that seek to preserve landscape character, rather than specific planning policy such as allocation of a site for development. For example, if a site is within an area allocated for development, this should not have a bearing on the susceptibility of the existing landscape to change.
1(4)	Conflicts of interest Is there risk of a conflict of interest if the landscape architect designing a scheme is also writing the LVIA?	This is covered at Paragraph 2.26 of GLVIA3 which indicates that it is important that judgements remain impartial. There is benefit to the designer and assessor being the same or the same team, since GLVIA3 and IEMA guidance advocate an integrated and iterative assessment-design process, whereby the design of the development can evolve in response to assessment findings as they emerge (and not just L&V findings) to avoid or reduce adverse effects.

1(5)	Proportionate approach How can we balance the need for thoroughness with proportionality?	GLVIA3 Paragraph 7.5 acknowledges that this can be challenging. Paragraphs 1.17 and 3.16 also address this topic. Ultimately this is a matter for professional judgement responding to the specifics of an individual project.
1(6)	Level of prescription (mandatory standards vs guidance)	GLVIA3 is guidance i.e. Landscape Institute members are not mandated to follow it, but are strongly encouraged to do so as a matter of good practice, unless there are exceptional reasons for not doing so. N.B. An example of a ‘standard’ is the Design Manual for Roads and Bridges .
1(7)	Assessment of allocated sites Should LVIA be carried out for allocated sites or should the LPA have carried this out prior to the designation in the local plan?	<p>The fact that an area has a certain planning status does not negate the potential need for assessment – including EIA and thus LVIA.</p> <p>Also, the following may be of relevance here:</p> <ol style="list-style-type: none"> 1. Understanding the difference between SEA and EIA: strategic environmental assessment (SEA) is used at the strategic level to ensure environmental considerations are integrated into the preparation and adoption of plans and programmes whereas environmental impact assessment (EIA) is used to ensure that planning decisions are made with full knowledge of a project’s likely significant environmental effects, and that any negative effects are prevented, reduced or offset, while positive effects are enhanced. 2. Understanding the difference between landscape sensitivity assessment (LSA) and landscape and visual impact assessment (LVIA). LSA is carried out for the purposes of strategic spatial planning, and LVIA assesses the effects of the specific development proposals. Both are important, at different stages of the process. LVIA should also help local communities understand the likely effects of specific proposals. <p>A clear professional judgement is needed to be communicated and robustly justified in the LVIA in order for decision makers to weigh up any harm against the benefits of the development in the planning balance.</p>

2. Definitions, scope and context

Some questions have been asked about the scope of the guidance (including relevance of the guidance to townscape and seascape assessments), the scope of LVIA, and the role of professional judgement.

	Issue/ question	Advice/ clarification
2(1)	<p>Application of GLVIA3 in townscape and visual impact assessment (TVIA)</p> <p>Specifically, comments have been made about difficulties in applying the GLVIA3 in a townscape context in relation to:</p> <ul style="list-style-type: none"> defining valued townscape in the absence of designations; judging the extent to which views contribute to the landscape or townscape setting enjoyed by residents (ref. bottom of page 113 of GLVIA3); assessing whether the effects are positive or negative and how to integrate the consideration of the aesthetic quality of the proposed development, i.e. does a 'beautiful' proposal result in beneficial effect? 	<p>TVIA should follow the same processes as LVIA (but within a townscape setting) using an appropriate methodology based on GLVIA3 (including assessment of effects on landscape elements in the townscape). When defining value outside designated areas, GLVIA3 states that judgements can be based on suitable criteria that can be used to establish value. LI TIN 05/2017 on Townscape Character Assessment and TGN 02/2021 'Assessing landscape value outside national designations' both provide relevant guidance.</p> <p>In judging whether a townscape setting is enjoyed by residents, the starting point should be to assume that views experienced by local communities contribute to the townscape setting enjoyed by residents unless there are clear indications to the contrary.</p> <p>Judgement regarding whether the effect is positive or negative should be as objective as possible, clearly explained and related to the baseline, and should take account of more than just architectural quality or 'beauty'. It should reflect how the design responds to its context and the contribution to the townscape and views the development makes, because a development which may be appropriate for one context may not be appropriate elsewhere. Design guidance pertinent to the proposal and its location may also inform the judgement.</p>
2(2)	<p>Application of GLVIA3 in seascape/coastal and visual impact assessment (SVIA)</p>	<p>SVIA should follow the same processes as LVIA (but within a seascape setting), so SVIA should be undertaken using an appropriate methodology based on GLVIA3.</p> <p>Specific guidance by statutory agencies and local authorities sits alongside GLVIA3. It is important to note the difference between guidance for identifying landscape (or seascape/coastal) sensitivity as part of strategic landscape planning (such as that provided by Natural England in relation to landscape and seascape sensitivity assessment) and identifying sensitivity for the purposes of LVIA or SLVIA – more information about assessing sensitivity as part of LVIA is set out at clarifications 5(4) and 5(5) in this document.</p> <p>As stated in GLVIA3, at Paragraph 5.41, existing landscape sensitivity studies provide useful background information, but do not provide a substitute for the assessment of the susceptibility of the receptors as part of LVIA. Appendices B and C of the MMO's 'An approach to seascape sensitivity</p>

		assessment' sets out susceptibility and value criteria and indicators that may be relevant to consider when assessing seascape sensitivity as part of a SVIA, to be suitably tailored to the project.
2(3)	How to assess a proposed development that is to be submitted for outline planning permission	<p>Paragraph 4.2 of GLVIA3 covers this topic. It is important to only rely for assessment on parameters that are secured as part of the outline application (for instance the maximum height of development), and not take account of factors that are not (such as the design shown on an 'Illustrative Masterplan', or the appearance of buildings depicted in design illustrations).</p> <p>Any limitations of the information available should be set out within the assessment.</p> <p>The Panel would encourage you to speak to your EIA Project Manager/planning lawyers about the level of detail required for robust assessment of landscape and visual effects.</p>
2(4)	Role of LVIA in the planning application	<p>GLVIA3 Paragraph 8.9) makes clear that LVIA "should not include advocacy for the scheme (including in relation to the design). Conclusions on the planning balance should also not be made within LVIA as such judgements need to take account of the policy balance in relation to all aspects of the project, not just landscape matters.</p> <p>Sometime LVIA's are introduced as 'submitted in support of the application'. This is wrong, instead they should 'accompany' the application.</p>
2(5)	How to employ professional judgement	<p>LI Members operate under the LI's Code of Conduct which requires members to exercise impartial and independent professional judgement.</p> <p>GLVIA3 covers this topic at Paragraphs 2.24 and 8.9, emphasising the need for clear, balanced, reasoned and transparent explanation to support professional judgements.</p>

3. Principles and overview of processes

Some questions have been asked about the overall process of LVIA, in particular the role of LVIA in EIA vs non-EIA appraisals and how to assess whether an effect is positive or negative.

	Issue/ question	Advice/ clarification
3(1)	How to carry out non-EIA Landscape and Visual Impact Appraisal (LVA)	<p>The Local Planning Authority (LPA) can request an LVA as part of pre-app discussions where they wish to be informed about landscape and visual effects. Early consultation with the LPA is recommended to ensure the appraisal contains the information needed to make an informed decision.</p> <p>In carrying out LVA, the same principles and process as set out in GLVIA3 may be applied but it is not required to establish whether the effects arising are or are not significant. There should still be a statement of the effects identified, which may identify the relative importance/ levels (rather than significance) of the effects.</p> <p>Effects should be comparable between LVA and LVIA. For example, a 'moderate effect' should be the same in both assessment contexts.</p>
3(2)	Baseline reporting: does there need to be a clear split between the baseline and assessment sections?	<p>The distinction should be clear because they have different purposes (see GLVIA Para. 3.15), but this distinction need not dictate that the structure and presentation of an assessment must include separate 'sections'.</p>
3(3)	Weighting of the components of magnitude: scale of effect, geographical extent and duration/reversibility	<p>It has been queried whether all the components of magnitude should be equally weighted or whether scale of effect is the most important. The landscape professional should apply their judgement, explaining in the method how components have been combined. For magnitude it is likely that the size/scale of effect will be the most important factor, with geographical extent and duration considered as 'slight modifiers' where effects are particularly restricted or widespread; or particularly short in duration. Examples where geographical extent and duration might influence magnitude include: if a development will be seen in close view, but only through one gate along an otherwise hedge-screened road; or if a source of impact would only be present for a few weeks or months.</p> <p>More information about interpreting geographical extent is provided in clarifications 5(11) (landscape) and 6(7) (visual).</p>
3(4)	How many categories of effect are recommended?	<p>Paragraph 3.27 of GLVIA3 states that three or four categories of effect are 'ideal'. The GLVIA Panel acknowledges that more categories may be useful in some instances (such as five or six categories). It is the assessor's responsibility to ensure their methodology is clear and the levels of effect are clearly defined.</p> <p>.</p>

3(5)	Significance: how to assess significance, where to set thresholds and how to achieve consistency	<p>GLVIA3 provides guidance on assessing significance, in particular Paragraphs 3.19 -3.36. The Panel highlight the following key points:</p> <p>Make sure the methodology clearly states the basis on which effects are judged as ‘significant’, and check that judgements are consistent with this (see GLVIA3 Para. 3.23) The use of the term ‘significant’ should convey issues that are material and that should be brought to the attention of the decision-maker (see GLVIA3 Para. 3.35)</p> <p>Avoid phrases such as ‘minor significance’. Identify the level of effect (e.g. ‘a minor level of effect’ or ‘effects would be minor’) and set out whether the effect is significant or not.</p> <p>As indicated at GLVIA Para. 33, it is not necessary to establish thresholds for levels of significance, provided that it is made clear whether effects are, or are not significant. However, typically, effects falling below the middle of the range of overall effect are assessed as not significant. For example, if using a scale of minor/ moderate/ major, then major effects will be significant and minor effects will not be significant. In this example, moderate effects are likely to be on the borderline and may or may not be significant and justification would need to be provided in making the judgement as to whether a moderate effect is significant or not. Regarding thresholds of significance and the need for consistency, the threshold of significance should ideally be consistent across projects. There are different points of view on whether significance should be judged before or after mitigation. Some practitioners assess at both stages, to convey the effectiveness of mitigation measures in reducing significant effects to ‘not significant’. The Panel emphasises that it is not helpful to do this for measures which are ‘designed in’ as the effects without mitigation would never arise. GLVIA3 Paras. 4.21- 4.22 and IEMA guidance echo this point. Statements of significance should be reported post primary (designed-in) mitigation, and pre secondary mitigation measures which are not designed into the scheme.</p> <p>It should be noted that judgements of significance are not judgements of acceptability considering the policy context, which is a matter for decision-makers. For example, it may be the case that the LVIA concludes that a proposal would result in ‘significant’ adverse effects on a receptor but the proposal could still be consistent with policy e.g. where the proposal is for a well-designed housing development on an allocated site and those effects would arise for any such development. Conversely, the LVIA could identify ‘no significant effects’ but the proposal could still be contrary to policy.</p>
3(6)	Use of matrices	<p>Diagrams or matrices can be useful as a means of illustrating to the reader how judgements are combined , but should not dictate judgements. LVIA is a means of documenting professional judgement, rather than a formulaic process. All judgements need to be supported by clear description.</p>

3(7)	Assessing whether an effect is positive or negative (or neutral)	<p>The EIA Regulations clearly state the need to identify positive/beneficial and negative/adverse effects.</p> <p>The level of effect and whether it will have a positive or negative (or neutral) consequence are independent of each other so that it is possible to report a major and neutral effect (i.e. an important change, but one which is neither better nor worse). Any judgement on the direction of the effect (positive, negative or neutral) should be clearly justified with transparent reference to the factors being taken into account.</p> <p>Care should be taken with terminology - some practitioners use the term neutral to essentially mean the same as negligible. Neutral should be used to describe a direction of effect and negligible to describe a level of effect.</p>
3(8)	Assessing frequency	<p>Frequency is one of the factors that can contribute to magnitude as part of duration.</p>

DRAFT

4. The proposed development, design and mitigation

Some questions have been received about the role of LVIA in the design process and mitigation of effects.

	Issue/ question	Advice/ clarification
4(1)	The role of LVIA in the design process	<p>GLVIA3 (see Para. 4.7) and IEMA guidance recommend an iterative design and assessment process.</p> <p>While changing the design of a proposal can reduce adverse landscape and visual effects through appropriate mitigation, LVIA is not intended to reflect every improvement in design. Design will primarily be considered outside the LVIA, against design-related policies as part of the decision making process. The LVIA should set out how the landscape (or townscape or seascape) and visual context of the development has influenced the design of the development and what design changes have been made to mitigate adverse landscape and visual effects and provide landscape and visual enhancements.</p> <p>In considering whether design elements constitute enhancement, clear separation must be maintained between project design aims and LVIA. For instance the provision of a sports pitch may be an enhancement to local recreation facilities, but still have adverse effects on landscape character.</p>
4(2)	What is the role of mitigation in landscape 'appraisal'?	<p>See 3(5) and 4(1) above. For LVA it will be appropriate to consider mitigation of adverse effects identified in the course of the appraisal, without the need to assess the significance of those effects.</p>

5. Assessment of landscape effects

Questions raised in relation to chapter 5 of GLVIA3 are set out below.

	Issue/ question	Advice/ clarification
5(1)	Landscape baseline: landscape character	<p>There have been some questions about how to deal with out of date landscape character assessments in LVIA. GLVIA3 states that existing assessments must be reviewed critically and potentially adapted (paragraphs 5.13 and 5.15) before they are used to inform the baseline for a LVIA. For out of date assessments this may take the form of identifying changes based on site observations, and/or supplementing with information from more recent assessments at a different level. GLVIA3 also suggests that where Landscape Character Assessments are not available project-specific character areas can be derived. Guidance on undertaking landscape character assessment is provided at www.gov.uk for England, in the Northern Ireland Official Publications Archive for Northern Ireland. Natural Resources Wales has produced LANDMAP as a baseline resource for Wales. NatureScot hosts the national coverage for Scotland, and is developing new guidance; meanwhile the 2002 guidance is still in use there.</p> <p>It is not necessary to assess effects on every landscape character type or area identified by assessments at different levels for any development – the best scale of assessment for the project should be selected.</p>
5(2)	Landscape baseline: landscape elements	<p>There has been a request for clarification about whether individual features and individual characteristics should be treated as landscape receptors (and significance ascribed), as well as character types and / or areas.</p> <p>Changes to individual landscape features and characteristics should be reported (including loss of trees), assessing how this will affect landscape character.</p> <p>Landscape elements and features on a site should also be considered as landscape resources in their own right and effects on them reported.</p>
5(3)	Landscape character baseline: historic landscape character	<p>As explained in pages 76–77 of GLVIA3, historic landscape characterisation is complementary to Landscape Character Assessment. Landscape professionals should make use of existing historic landscape information. For example, understanding the time depth of landscape elements may be relevant to the susceptibility and value judgements about the landscape. Assessing the effects on the historic environment is a separate specialist topic in EIA, but there are overlaps between the landscape and heritage topics and it is important that specialists discuss overlapping issues and agree how they should be dealt with, including the terminology being used.</p>
5(4)	How to assess landscape susceptibility	<p>This is an area that has caused some debate amongst practitioners – especially how much detail of the proposed development should be taken into account in assessing landscape susceptibility. The issue raised by a number of members is that if the exact proposal is assessed</p>

		<p>as part of susceptibility it becomes an assessment of magnitude of change with a potential for overlap and double counting.</p> <p>GLVIA3 refers to the 'type of change arising from the specific proposal' (paragraph 3.26) and encourages practitioners to avoid using 'intrinsic' or 'inherent' sensitivity without reference to a specific <i>type</i> of development.</p> <p>Landscape susceptibility will vary with the <i>type</i> or <i>nature</i> of change. This relates to the type of development (whether it be housing, a railway, warehouses, afforestation/deforestation, open storage, a wind farm, a grid connection etc.) and the scale of the change (e.g. whether the proposal is for 4 or 400 houses). If more detail is known about the development this can also feed into and inform the judgement about how susceptible the site and the surrounding landscape is to what is proposed, but care should be taken to avoid double counting with magnitude .</p> <p>Criteria can be used to judge susceptibility e.g. landform, landcover, landscape pattern and scale, enclosure, tranquillity/ man-made influence, time depth etc. Relevant criteria will be dependent upon the development type being considered and should be tailored to the project.</p> <p>Existing sensitivity studies may be helpful in identifying appropriate susceptibility criteria. It is helpful to set out indicators of susceptibility against each criterion in the method to explain judgements. Some example criteria and indicators of susceptibility are set out in Natural England's 'Approach to landscape sensitivity', NatureScot's 'Landscape Sensitivity Assessment – Guidance for Scotland' and NRW's 'Landscape Sensitivity and Capacity Assessment for on-shore wind and solar photo-voltaic developments: an assessment approach for Wales' (currently in draft and focused on wind energy and solar PV developments). The MMO's 'An approach to seascape sensitivity assessment' sets out criteria relevant to seascape and coastal environments.</p>
5(5)	Susceptibility of non-host landscapes	<p>Some practitioners consider 'non-host' areas of landscape to have a different susceptibility than if they were 'host areas'. There are no hard and fast rules for assessing susceptibility of 'host' and 'non-host' areas – it is up to the assessor to devise an appropriate approach and record it clearly. However, the approach used should aim to avoid too much overlap (or double counting) between susceptibility and magnitude judgements.</p>
5(6)	Landscape susceptibility and policy: does the wording used in paragraph 5.40 of GLVIA3 mean susceptibility is dependent on policy?	<p>The word 'policy' used in paragraph 5.40 of GLVIA3 means general policy (and strategies) relating to landscape, for example policy objectives seek to conserve and enhance an AONB, or local plan policy that seeks to preserve landscape character, rather than specific planning policy such as allocation of a site for development. For example if a site is within an area allocated for development, this should not have a bearing on the susceptibility of the existing landscape to change.</p>

5(7)	How to assess landscape value	<p>Paragraph 5.24 of GLVIA3 states “<i>landscape value of that specific area maybe different from that suggested by the formal designation</i>”. This has caused some confusion. Landscape value within nationally designated landscapes should be at the highest level (e.g. expressed as high/ very high/ of national value).</p> <p>For landscapes outside nationally designated landscapes the LI’s recent TGN 02/21 on Assessing landscape value outside national designations may also be helpful.</p>
5(8)	Word scale for landscape value	<p>The word scale used to express landscape value is up to the assessor to determine, as long as definitions are provided and the process is clear to follow.</p>
5(9)	Combining landscape susceptibility and value to reach a judgement on landscape sensitivity	<p>It has been suggested that landscape susceptibility and landscape value are incommensurable, and therefore it is not easy to combine them to provide an evaluation of landscape sensitivity. As long as each is clearly defined in the method and a clear scale of ratings provided it should be possible for both to influence the assessment.</p> <p>It is also worth noting that GLVIA3 allows for two approaches to combining judgements to come to a judgement of overall effect. One is the ‘sequential combination’ method whereby susceptibility to change and value can be combined into an assessment of sensitivity for each receptor; size/scale, geographical extent and duration and reversibility can be combined into an assessment of magnitude for each effect; and magnitude and sensitivity can then be combined to assess overall significance. The other approach is the ‘overall profile’ method whereby all the judgements against the individual criteria can be arranged in a table to provide an overall profile of each identified effect, taking an overview of the distribution of the judgements for each criterion to make an informed professional assessment of the overall significance of each effect. Judgements on susceptibility and value feed into both approaches.</p>
5(11)	Magnitude: Interpreting geographic extent for landscape judgements	<p>GLVIA3 appears to suggest that geographical extent (and therefore magnitude) would be smaller if the change occurs within a landscape type or character area, and larger if a change is felt across several types or character areas – but this advice is hard to apply to individual receptors i.e. should the magnitude of effect on one LCA be greater simply because other LCAs are also affected?</p> <p>The Panel suggests that geographical extent should reflect the importance of the location and spread of effects, as a ‘slight modifier’ to the scale of effect so that it does not understate the magnitude of effects for extensive receptors such as large character areas or designations.</p> <p>What the decision maker wants to know is where the most important (or ‘significant’ in the case of EIA) effects will arise, and why and to what degree that matters.</p>

5(12)	Assessing effects on designated landscapes and special landscape qualities	<p>Landscape designations apply to areas that are deemed special and therefore worthy of protection. The designation confers protection on the landscape and contributes to the assessment of value.</p> <p>The area of landscape that is designated is likely to have already been assessed in terms of effects on its features (if relevant) and character. In addition to this, the assessor should report on how the special qualities (i.e. the components of natural beauty) of a designated landscape would be affected. Special qualities may also include particular views or types of visual experience and drawing on the visual assessment is likely to be relevant to inform this aspect.</p> <p>For most national landscape designations, the special qualities are explicitly documented as such (typically in management plans for AONBs, local plans or management plans for National Parks, or in reports published by NatureScot for designations in Scotland). For local designations, the valued attributes may not be called ‘special qualities’ and are more likely to be found within landscape studies which form part of the local plan evidence base or within the local plan.</p> <p>The policy tests and proposal’s effects on the integrity of the designation are judgements for the decision maker, using the evidence contained in the LVIA.</p>
5(13)	Assessing effects on setting of designated landscapes.	<p>It should be noted that the setting of protected landscapes is generally created in policy and is not a designation (or a receptor) in its own right. In LVIA, the question would remain whether changes in the setting (i.e. the landscape nearby but outwith the designated area) would affect the designated landscape in terms of effects on its special qualities (and, if so, to what degree). For example a major development close to a designated landscape could generate noise, lighting and visual impacts that could erode the tranquillity, dark skies, and scenic quality of views.</p>

6. Assessment of visual effects

Questions raised in relation to chapter 6 of GLVIA3 are set out below.

	Issue/ question	Advice/ clarification
6(1)	Should residential receptors be included in an LVIA?	<p>GLVIA3 is clear that people living in the area of the proposed development have to be considered as receptors (Para 6.13) and that views from settlements should be considered (para 6.20).</p> <p>A LVIA should consider views from local communities focusing on the way that a community currently experiences views from public locations such as streets and open spaces and how those will change.</p> <p>Views from houses and individual properties are a matter of private amenity. However, it is helpful for a LVIA to comment on changes to views that will be experienced from groups of properties, or in some cases individual properties, if these changes are likely to be significant.</p> <p>Where required², a residential visual amenity assessment (RVAA) should consider effects on private amenity for people in their homes and gardens in more detail (as set out in Technical Guidance Note 2/19 Residential Visual Amenity Assessment).</p> <p>The LVIA and RVAA may refer to and inform each other, but are covered by separate guidance.</p>
6(2)	Assessing susceptibility (visual): is susceptibility influenced by the occupation or activity of the receptor, the development type or both?	<p>See GLVIA3 paragraph 6.32: Visual susceptibility is not influenced by the development type, which would be assessed as part of magnitude.</p>
6(3)	Does the ‘value’ aspect of visual susceptibility relate to the view or the receptor	<p>Paragraph 3.24 of GLVIA may cause some confusion by using the word ‘receptor’ in discussing both landscape and views, however para. 6.37 provides clear guidance confirming value relates to the view.</p> <p>Although not included in the criteria in GLVIA3, some practitioners consider the scenic quality of a view to influence its value. Where the scenic quality of a view is not locally recognised or documented (reflecting its value to society) the assessor needs to provide clear explanation for their judgements.</p>

² RVAA may be required by the determining / competent authority, for example in situations where it is possible that the effect on the outlook / visual amenity of a residential property or properties is so great that the proposed development is against the public interest, as explained in Technical Guidance Note 2/19 Residential Visual Amenity Assessment.

6(4)	Assigning value to views in residential areas	LVIA relates to public amenity – the value of the view to the public - and Residential Visual Amenity Assessment (RVAA) relates to private amenity - the value of the views to those who live there. These may be different. The criteria for value attached to views contained in GLVIA3 (at paragraph 6.37) focuses on recognition through designation, appearances in guidebooks/ literature or provision of facilities for their enjoyment by the public. In residential areas there may be indications that a specific view is valued, for example as identified in a Conservation Area appraisal or Local/ Neighbourhood Plan, or a bench placed in a particular location within a settlement to provide an attractive view or composition of features. . In all cases the criteria for assessing value should be clearly set out and the assessment should provide evidence for the judgements made.
6(5)	Word scale for view value	The word scale used to express view value is up to the assessor to determine, as long as definitions are provided and the process is clear to follow.
6(6)	Agreeing viewpoints	<p>It is recommended (GLVIA3 Para 6.18) to agree viewpoints to be considered in the assessment with the appropriate authority.</p> <p>If this is not possible, then EIA Regulations require us to set out any limitations on or difficulties encountered in carrying out our assessment. It is recommended that the assessor demonstrates that efforts have been made to agree viewpoints for both LVIA's and LVAs.</p> <p>Regarding seasonal constraints, it is within the competence of a landscape professional to be able to describe how the landscape and views would vary with the seasons, and to take account of these changes in their assessment.</p>
6(7)	Assessing viewpoints or visual receptors?	The focus of the visual assessment should be the visual receptors (i.e. the people as set out within Para 6.31. of GLVIA3). The purpose of viewpoints is covered at Para 6.19 (i.e. for illustration of the visual effects). No precise approach to visual assessment is set out in GLVIA3 – it is up to the assessor to select the most appropriate approach and ensure that issues that are important to the planning decision are assessed and reported.
6(8)	How to assess geographic extent for visual receptors	<p>Practitioners are interpreting geographic extent in relation to visual effects in different ways. For example, the Panel has seen examples where it has been interpreted as the extent of the visual receptor affected (e.g. walkers on the footpaths affected for larger or shorter lengths, or larger or smaller parts of community), as well as being interpreted as the angle of the view affected from a single point receptor.</p> <p>The Panel suggests that the former is preferred (the angle of view affected should be assessed as part of scale). Geographical extent should reflect the importance of the location and spread of effects, as a 'slight modifier' to the scale of effect so that it does not understate the magnitude of effects for extensive receptors such as long-distance footpaths. For example, in a case where a development will be seen in a close view, but only through one gate along an otherwise hedge-screened road or footpath this small geographic extent of effect on</p>

		the receptor may modify the magnitude judgement for the receptor down a little. However, where only a small extent of a receptor may be affected, but views from that part of the receptor are particularly important the scale of effect may not be modified. What the decision maker wants to know is where the most important (or 'significant' in the case of EIA) effects will arise, and why and to what degree that matters..
6(9)	How do we allow for the number of people that will experience a view in the assessment?	GLVIA3 para. 6.3 suggests that <i>"it can also be useful to establish the approximate or relative number of different groups of people who will be affected by the changes in views or visual amenity"</i> as part of the baseline, but does not refer to how this information should be incorporated into the assessment. This is therefore for the assessor to determine as part of developing the assessment methodology. One approach would be to note (where relevant) a broad indication of the number of people affected (or busyness of routes) alongside the effect i.e. whether an identified effect affects a relatively small or relatively large number of people.

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7. Assessing cumulative landscape and visual effects

Clarifications in relation to cumulative landscape and visual impact assessment are below.

	Issue/ question	Advice/ clarification
7(1)	Cumulative assessment	<p>The Panel is aware that cumulative landscape and visual impact assessment can be complex and suggests that practitioners become familiar with the difference between intra-project and inter-project effects (as set out in GLVIA3 Paras 7.7. and 7.8), and the difference between additional effects and combined effects (as set out in Para 7.18 of GLVIA3).</p> <p>The task should be in proportion to the nature of the project under consideration (Para 7.5 GLVIA3) and the scope should be agreed in discussion with the competent authority and consultation bodies (Para 7.4).</p> <p>See also IEMA (2020) 'Demystifying Cumulative Effects', Impact Assessment Outlook Journal Volume 7.</p>
7(2)	What other projects to consider: comparison between the EIA Regulations, GLVIA3 and PINs Advice Note 17 requirements?	<p>The EIA regulations (2017) require consideration of “<i>the cumulation of the impact with the impact of other existing and/or approved development</i>”.</p> <p>It should be noted that this does not mandate that existing and consented development must be explicitly considered in a section of an LVIA identified as a ‘cumulative assessment’ – merely that impacts must be considered in the context of existing and expected future developments.</p> <p>GLVIA3 refers to cumulative assessment of the proposal with “<i>past, present and future proposals</i>”, typically excluding pre-planning or scoping stage proposals unless the competent authority or consultation bodies consider this to be necessary.</p> <p>PINs Advice Note 17 refers to three ‘tiers’ where Tier 1 includes permitted or submitted planning applications, Tier 2 refers to projects where a scoping report has been submitted and Tier 3 projects relate to sites where a scoping report has not been submitted but may be identified in a plan or programme.</p> <p>Nature Scot guidance introduced the concept of distinguishing between predicted cumulative impacts in different ‘scenarios’ e.g. assessing a proposal in combination with existing and consented developments, or proposal in combination with existing, consented and planning application stage developments.</p> <p>The cumulative LVIA should focus on the assessment of the project under consideration in the context of other submitted planning applications (potentially considering different combinations or scenarios where relevant³) with scoping stage schemes only considered where they are likely to be submitted before or at a similar</p>

		<p>time to the project under consideration, and interact with the project in a potentially significant way.</p> <p>The approach taken to consented developments may vary on a case-by-case basis. Where it is likely that a consented development will be constructed before the project under consideration, it may be appropriate to include it as part of the future baseline in the main assessment so that the effects of the proposed development are reported against that baseline. Where there is some uncertainty as to whether the consented development will proceed or the project being considered is likely to be constructed before the consented development, then consideration of the consented development within the cumulative assessment is more likely to assist in the reporting of likely effects. The developments to be included in the cumulative assessment should be decided on a case by case basis in consultation with competent authority.</p>
7(3)	Additional or combined effects?	<p>Additional cumulative effects are defined in GLVIA3 as the additional effect of the project in conjunction with other developments of the same type. This is typically assessed as the effect arising from the proposed development when considered against a baseline containing the other developments in the scenario being considered (i.e. what the effect of adding the project under consideration would be if Development X was already built).</p> <p>An additional cumulative effect may be the same as the effect of the development being assessed as recorded in the LVIA, or it may be different. An example of where the additional cumulative effect may be different is when the development being assessed would be seen behind another cumulative development. In this situation the effect of the proposed development may be less than the effect of the proposed development alone.</p> <p>Combined (also referred to a ‘total’) cumulative effects are defined in GLVIA3 as all the past, present and future proposals together with the new project. Typically a ‘combined’ cumulative assessment would consider the addition of all unbuilt schemes, including the proposed development, to the existing baseline (rather than the combined effect of all past, present and future schemes against a ‘bare landscape’).</p> <p>Both ‘additional’ and ‘combined’ cumulative effects may be relevant to consider, acknowledging that the assessor will not have assessed the other schemes and cannot therefore make a fully informed judgement on combined effects (as pointed out in paragraph 7.18 GLVIA3). Typically a ‘combined’ cumulative assessment is only relevant where a decision maker is likely to need to consider proposed developments together – for instance a conjoined appeal, or applications likely to be decided at the same planning committee session. In other situations, the ‘additional’ cumulative effects assessment will provide the information needed to understand the effects if another application has been recently consented.</p> <p>TGN 02/19 Residential Visual Amenity Assessment guidance provides guidance at para. 4.25 as to how cumulative effects should be considered within RVAA, setting out where it may be appropriate to</p>

		consider whether the 'combined' presence of developments would breach the residential visual amenity threshold
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8. Presenting information on landscape and visual effects

A few queries have been raised about presentation of information in an LVIA.

	Issue/ question	Advice/ clarification
8(1)	Impartiality	<p>The issue of impartiality is very important in LVIA;</p> <p>we also operate under the LI's Code of Conduct which requires assessors to exercise impartial and independent professional judgement. Care should be taken that the reporting within an LVIA reflects this duty.</p>
8(2)	How should night-time effects be assessed and presented as part of LVIA?	<p>GLVIA3 mentions lighting in Para 6.12.</p> <p>Types of light pollution (obtrusive light) which can include sky glow, glare, light spill and light intrusion are explained in the Institute of Lighting Professionals' Guidance Note 01/21 'The Reduction of Obtrusive Light'.</p> <p>A night time assessment should not be a routine requirement and will only be required where lighting will have a potential significant influence on landscape character and/ or visual amenity, as a result of the combination of the sensitivity of the receiving night time environment and the nature of the proposed lighting.</p> <p>Any night time assessment will require the recording of night time conditions for landscape and visual receptors (which may be undertaken by the lighting designer as part of a Lighting Assessment baseline). Resources such as the CPRE's and NRW's dark skies mapping and information about dark sky reserves will also be useful to feed into the baseline reporting.</p> <p>Understanding of the baseline will enable the assessor to input to the lighting design (for example focusing light only where it is needed, or reducing the effect of lighting on specific landscape or visual receptors). Useful guidance is provided in the ILP Guidance Note 01/21 'The Reduction of Obtrusive Light', CIE 150: 2017 Guide on the Limitation of the Effects of Obtrusive Light from Outdoor Lighting Installations and CIE 126: 1997 Guidelines for Minimizing Sky Glow.</p> <p>The assessment of the effects of lighting may draw on quantitative information from the lighting design –in the form of mapped illuminance values or as experience from viewpoints. The LVIA assessor will use this information to understand and articulate the effect of lighting on landscape character and visual amenity of people. Terminology used should be consistent with the ILP Guidance Note 01/21 'The Reduction of Obtrusive Light'.</p> <p>NatureScot has provided guidance on assessing the effects of turbine lighting in Annex 1 of their 'General pre-application and scoping advice for onshore wind farms'.</p> <p>There has also been a request from members for guidance on night-time photography and visualisations. This would be separate guidance linked to TGN 06/19 on 'Visual Representation of Development Proposals'.</p>

9. Questions on other related topics

This section addresses questions raised by Members which are on topics related to LVIA but do not fit into the tables above.

	Issue/ question	Advice/ clarification
9(1)	Is an assessment of ‘capacity’ of the landscape required as part of LVIA?	<p>No. Capacity or sensitivity studies are undertaken at the strategic landscape planning level rather than the individual project proposal level (noting that there has been a general move away from capacity studies and towards sensitivity studies).</p> <p>GLVIA3 acknowledges that where there are existing landscape sensitivity and capacity studies ‘they may provide useful preliminary background information for the assessment.’ (Para 5.41).</p> <p>Caution should also be exercised in using capacity studies (and some sensitivity studies) as they may consider aspects of potential effects arising from development (e.g. upon nearby visual receptors) which are not relevant to landscape sensitivity.</p>
9(2)	Climate change: The most recent EIA regulations update requires specific consideration of climate change. How should climate change be considered as part of an LVIA?	<p>Climate change considerations are becoming a specialist area of EIA, to which the landscape assessor contributes with specific information about likely landscape change. IEMA has a number of resources including Environmental Impact Assessment Guide to Climate Change Resilience and Adaptation (2020) and Guidance on Assessing GHG Emissions (2022).</p> <p>Within the LVIA landscape change expected to result from climate change may be relevant to report in the future baseline i.e. considering what the baseline may be like in the future in the absence of the proposal.</p>
9(3)	How does GLVIA3 relate to the Design Manual for Roads and Bridges (DMRB) and which should be used when?	<p>The Design Manual for Roads and Bridges (DMRB) is a standard (not just guidance) relating to the design, assessment and operation of motorway and all-purpose trunk roads in the United Kingdom. Part LA 107 Landscape and visual effects contains the requirements for assessing and reporting the landscape and visual effects of highway projects. GLVIA3 should be used for all other project types.</p>
9(4)	How does LVIA relate to green belt and ‘openness’ issues?	<p>As stated in GLVIA3 para 5.4, ‘openness’ may be one of the aesthetic and perceptual aspects of the landscape and may therefore be documented and assessed as part of the LVIA. However, Green Belt is a planning policy designation and compliance with policy should be addressed separately to the LVIA.</p>
9(5)	Soils as a receptor in LVIA?	<p>It has been queried whether soils should be treated as a landscape receptor in LVIA. This goes beyond LVIA and to the heart of EIA more widely. The Panel is liaising with IEMA about future changes in EIA and this topic will fit into those discussions (see EIA Guidance on Land and Soils, and this related article from IEMA’s website).</p>

