

## WHEELABRATOR, HAREWOOD, ENERGY FROM WASTE FACILITY, HAMPSHIRE

### LANDSCAPE AND VISUAL REPRESENTATION TO STAGE TWO CONSULTATION

#### 1.0 Introduction

1.1 This representation sets out the landscape and visual issues associated with the proposed energy from waste facility, Harewood, Hampshire and is based on the following November 2019 Stage 2 Consultation documents:

- Stage Two Consultation Autumn 2019 Newsletter. This contains a photomontage from The Street to the south of the A303; birds eye photomontages; and a cross section.

The following chapters of the Preliminary Environmental Investigation Report (PEIR):

- Chapter 1 – Main Report and Figures
- Chapter 2 – Assessment Methodology and Significance Criteria (and Appendix 2.1)
- Chapter 3 – Description of the Site
- Chapter 4 – The Proposed Development (and Appendix 4.1 CEMP)
- Chapter 5 – The Need for the Proposed Development, Site Selection, Alternatives and Design Evolution
- Chapter 12 – Ground Conditions
- Chapter 14 – Landscape and Visual Impact Assessment (and Appendices 14.1 – 14.8).

1.2 The author of this representation is a Chartered Member of the Landscape Institute who has extensive experience of preparing landscape and visual impact assessments for a range of developments and has successfully acted as an expert witness on landscape planning matters.

#### 2.0 Overarching Landscape Approach and Policy

2.1 In terms of the National Planning Policy Framework 2019 (NPPF) the following are key considerations in relation to landscape and design decisions:

- Para 127 under the section ‘Achieving well-designed places’ states: *“Planning policies and decisions should ensure that developments:*
  - a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
  - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping.*
  - c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- Para 170 under ‘Conserving and enhancing the natural environment’ states: *“Planning policies and decisions should contribute to and enhance the natural and local environment by:*
  - b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of ... trees and woodland.”*

2.2 The Landscape and Visual Impact Assessment Chapter 14 of the PEIR sets out that the proposed development would result in moderate to major adverse effects. No beneficial landscape or visual effects have been identified. The proposed development therefore doesn’t meet the requirements of NPPF Para 127a.

- 2.3 In terms of being visually attractive and of good architecture, for this type of development the combination of size and orientation of the site together with the functional requirements of the building have driven its design and layout. There are spaces left over for landscaping, rather than landscape informing the location and layout of the proposed development. The proposed development therefore does not meet the requirements of NPPF para 127b.
- 2.4 With regard to the proposed development being sympathetic to local character, history, its contextual environment and landscape setting, whilst the LVIA Chapter 14 sets out the key characteristics and guidelines of the tiers of landscape character, it does not set out how these local level strategies have informed the scheme proposals. In particular, 14.185 of LVIA Chapter 14 states: *“Key local issues identified for the TVLCA 10E include further solar and other renewable development eroding the rural character of the area; the influence and degrading of the landscape with land uses adjacent to the A34 and A303; and the impact of tall structures. In response, land use and development guidelines for the TVLCA 10E include:”* (at the second bullet point) to *“Avoid intrusive development of tall and large structures except where they can be successfully integrated into the landscape;”* Whilst it is fact that the site lies next to an existing industrial area, these industrial sheds, like many of the surrounding agricultural barns, these sit down in the landscape, below the visual horizon. The Proposed Development is an intrusive, tall, industrial structure which does not integrate into the landscape, but will rise significantly above the treed horizon in the predominantly rural landscape. Furthermore, the LVIA concludes that residual moderate adverse landscape effects would remain on the county level landscape character area within which the site sits; and major adverse landscape effects at the district level. These judgements would not be made if the proposed development addressed para 170, sub-section b. The proposed development therefore does not meet the requirements of NPPF 170 and sub section b.
- 2.5 Notwithstanding Overarching National Policy Statement for Energy (EN-1) the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA 3, by the Landscape Institute and the Institute of Environmental Management and Assessment, 2013) provides the national industry standards for the preparation of Landscape and Visual Impact Assessments, which at para 4.21 states that: *“In accordance with the EIA Regulations, measures proposed to **prevent / avoid, reduce and where possible off-set or remedy (or compensate for)** any significant adverse landscape and visual effects should be described.”* Emphasis added. Para 4.25 on prevention / avoidance goes on to state that: *“Some likely significant adverse landscape and visual effects can be prevented or avoided through careful planning, siting and design... This may be achieved by the selection of a site that can more readily accommodate the proposed development or through innovative design within the selected site....”* Para 4.26 deals with reduction and states that: *“If potentially significant adverse effects cannot be prevented or avoided, the strategy should be to reduce those that remain as far as possible. In general the emphasis should be on modifying the scheme design through successive iterations to reduce adverse effects. Sympathetic treatment of external areas can, in some circumstances, help the integration of a new development into the surrounding landscape, but measures that are simply added on to a scheme as ‘cosmetic’ landscape works, such as screen planting designed to reduce the negative effects of an otherwise fixed scheme design, are the least desirable. It should also be remembered that well-designed new development can make a positive contribution to the landscape and need not always be hidden or screened.”*
- 2.6 GLVIA defines at para 4.27 that typical mitigation measures may include the following, with a response relative to the site proposals set out after the bold text:

- **Adjustment of site levels.** In terms of the proposed development, due to the location of the site on a principal aquifer (AECOM scoping report para 2.1.4) there is a significant restriction on adjusting site levels to sink the building into the landscape to reduce the impact of the proposals scale and mass on the surrounding landscape and visual receptors.
- **Use of appropriate form, detailed design, materials and finishes.** The form and function of the proposed development have significantly influenced the site layout and design of the proposed development. No innovative design is proposed. The only mitigation measures are to apply muted green and grey colours.
- **Alterations to landforms, including creation of bunds or mounds, together with structure planting on and /or off-site.** The proposed built form dominates the site, leaving little space for the creation of bunds or mounds or structure planting. No well-considered landraising measures are proposed outside of the site, nor is any off-site planting proposed. Furthermore, the proposal relies on vegetation outside of the site for mitigating in part views of the lower elevation and operations on the site from the south. The land to the south of the site is owned by the MOD and with planting also relating to the A303 corridor. The developer is not in control of this vegetation and as such it cannot be relied on as mitigation in perpetuity. Furthermore, as is evident on many landholdings up and down the country, a large number of trees are being removed due to Ash dieback, which will result in a major change to the character of the landscape. There has been no consideration of this.
- **Avoiding or reducing obtrusive light.** Due to the height of the proposed chimneys, aviation lighting will be required. There are no measures proposed for avoiding this impact.

2.7 Para 4.29 of GLVIA goes on to state that: *“Mitigation measures... should be designed to fit with the existing character of the landscape where this is desirable landscape objective, respecting and building upon local landscape distinctiveness, for example in use of materials that are locally derived. They should also respond, where possible, to landscape objectives that may have been set in development or management plans or strategies for the area.”* In terms of materials, the scheme proposals do not include materials that respect local distinctiveness for the main bulk of the building.

2.8 Para 4.33 on offsetting, remedying and compensating states that these measures: *“... should generally be regarded as measures of last resort.”*

2.9 Furthermore, there is no response to the sections of the National Design Guide, October 2019.

### 3.0 Landscape and Visual Commentary on Project Update Leaflet

3.1 The ‘indicative image’ on the front of the leaflet and again at p5 is based on a google streetview image and is therefore at an elevated location. Whilst the accuracy of this image is questioned it does demonstrate that this building will be a significant visual intrusion in the predominantly rural landscape. The PEIR documents state that visually verified montages (VVM’s) have been prepared, but they haven’t included them on the leaflet. The reason behind including a CGI over a VVM is questioned. Furthermore, the light grey sky background in this image shows how the scheme could potentially blend into the sky on a cloudy day, but does not take account of a typical summer sky; nor do any of the images show the plume. It is not clear from the set of Illustrative Parameter Plans (Figures 4.1 and 4.2) and Rochdale Plans showing the proposed elevations (Figures 4.3- 4.6) in Chapter 4 of the PEIR on the Proposed Development how these translate into the ‘indicative image’. In particular, the elevations show an angular built form (Figures 4.3-4.6) rather than the curved

building shown on the images. No information is provided in Chapter 4 to inform the indicative image on the leaflet. The Landscape Institutes Technical Guidance Note 06/19 on Visual Representation of Development Proposals (17 September 2019) states at para 1.1.2 that: *“In all instances, the principles of clear, open and transparent communication and fitness for purpose should apply.”* Para 1.2.2 goes on to state that: *“It is critical that these visualisations are accurate, objective and unbiased.”* There are a number of discrepancies in the information provided therefore that question the validity of the indicative image. It is therefore misleading to show the illustrative scheme over that for which consent is sort.

- 3.2 PEIR Chapter 4 on the Proposed Development mentions the use of solar panels. The location and details of these has not been provided and is not included on any of the imagery in the leaflet (nor anywhere else in the PEIR). The landscape and visual effects of these have also not been considered in Chapter 14 of the PEIR.
- 3.3 The zinc coating to the cladding is proposed to reflect ambient light and colours. However, zinc is available in a range of shades. No specific shade is specified on the leaflet nor in the PEIR documents.
- 3.4 The birds eye view of the alternative cladding options on p4 demonstrates the scale and mass of the built form in comparison with the neighbouring industrial building, which is set down in the landscape. Whilst these assists understanding of the massive scale of the proposed development, as it is shown against the landscape backdrop, it misleads the reader on how the scheme would actually look like at eye level.

#### **4.0 Landscape and Visual Commentary on PEIR Documents**

- 4.1 Notwithstanding the fundamental flaw in avoidance and reduction of the landscape and visual effects, the following paragraphs set out rebuttal points.

##### **Chapter 1 - Introduction**

- 4.2 Paragraph 1.19 gives the impression that further design work will continue. However, in terms of the landscape and visual effects described in Chapter 14, residual major and moderate adverse effects will occur. These effects have not been reduced at all. It is anticipated therefore, as narrated at para 14.701, that there is little intention to further mitigate these effects as the developers apply the tilted balance of NPS EN-1.

##### **Chapter 2 – Assessment Methodology and Significance Criteria**

- 4.3 Par 2.15 states, relative to the Planning Inspectorate Advice Note 7 and the preparation of Preliminary Environmental Information (PEI): *“... A good PEI is one that enables consultees (both specialist and non-specialist) to understand the likely environmental effects of the Proposed Development and helps to inform their consultation responses on the proposed Development during the pre-application stage.”* However, with the exception of a single ‘indicative image’ from the south in the Consultation Leaflet (which has been generated from Google Streetview rather than using Viewpoint 4 from the LVIA) there are no other visually verified montages or statements on mitigation measures in the PEIR chapters or Non-Technical Summary (NTS) to assist the reader to understand what the proposed development would look like from the north, east and west. Whilst it is recognised that the provision of such material at this stage is not a specific requirement for the PEIR (as set out by PINS) Chapter 4 on The Proposed Development (para 4.17) states that this information will be provided in PEIR Chapter 14 – Landscape and Visual Impact Assessment. This information has not been published and it is therefore questioned how the judgements on

visual impact in Chapter 14 have been reached without this information; and how the consultees can come to any meaningful conclusions without verified information.

- 4.4 Para 2.33 states that: *“The design process for the Proposed Development has been heavily influenced by the findings of the early environmental appraisals and the EIA process undertaken to date. Therefore, a number of measures have already been introduced into the concept design to avoid or minimise impacts.”* This statement is disputed, as Chapter 14 of the PEIR sets out that major adverse effects will remain for a number of visual receptors, thus effects have not been avoided or minimised at all.
- 4.5 Under the subsection on inter-relationships and cumulative effects, para 2.47 sets out that these are considered in Chapter 10 on Biodiversity and Chapter 8 on Health. There is no reference to Chapter 14 for Landscape and Visual receptors which is a significant omission as there could be some significant landscape and visual impacts arising from the construction operations associated with burying the proposed electrical grid connection to the district substation in Andover, but also considering any changes arising at the neighbouring Raymond Brown facility as a result of this proposal. Whilst Table 2.2 sets out that a precise corridor has not yet been selected, surely at this stage some alternative options should be set out as part of the assessment of alternatives.

### **Chapter 3 – Description of the Site**

- 4.6 There is an inconsistency on potential receptors between Chapters 3 and 14 (LVIA). The conclusions of the LVIA in terms of the effect on the range of visual receptors is therefore questioned. Under the subsection on Potential Environmental Receptors, Table 3.1 includes Human receptors, which includes residents at the Barton Stacey Services, at Roberts Road, at the surrounding villages; Staff at Raymond Brown facility; Local farms; users of local recreational facilities such as the shooting school, go karting, cricket grounds; users of public rights of way; users of the MoD land; road users of Drayton Road and The Street; those at education premises; and construction and operational workers.

### **Chapter 4 – The Proposed Development**

- 4.7 This chapter sets out the Rochdale Approach in terms of assessing maximum building envelopes, however, no further information has been provided to understand how the assessment of visual effects has been determined.
- 4.8 Paragraph 4.17 states that: *“A suite of photographs from key public viewpoints illustrating the scale and mass of the Proposed Development using the maximum parameters in Table 4-2 are presented as figures within Chapter 14: Landscape and Visual Assessment. Figures 4-3 to 4-6 provide an illustration of how the Proposed Development may look utilising the maximum worst case parameters set out in Table 4-2 and based on the current design concept.”* Other than the baseline situation, there are no such viewpoints illustrating the scale and mass of the proposed development in Chapter 14, nor any other chapter. The only images provided of the scheme in this Chapter are show in the Parameter Plan (Fig 4.1), Illustrative Site Layout (Fig 4.2) and Elevations (Fig 4.3-4.6). It is assumed that it is Figs 4.1, 4.3-4.6 (and therefore excluding the ‘Illustrative’ plans – Fig 4.1 and 4.9) that are the plans for which consent is being sort. Whilst these plans are helpful in understanding the scheme proposals, the inclusion of at least 1 no. visually verified montage from north, east, south and west would provide the reader with a full understanding of the parameter scheme proposals (over the ‘indicative image’ provided as part of the consultation documents).
- 4.9 Para 4.24 state that the grid connection will be via a new substation built on site, with the off-site electricity transmission line not forming part of the Proposed Development and will

instead be developed by the network operator through a separate planning application or through permitted development rights. Whilst stated that this will be considered in the cumulative assessment, this has not been included in Chapter 14 and is therefore a significant omission of the scheme proposals at this stage. This information and co-ordination of related scheme proposals should be considered together as part of this application, as the integral part of the proposal is to generate electricity for input to the national grid.

- 4.10 The use of solar panels is set out briefly at para 4.62 as either being roof or wall mounted. If wall mounted, these are likely to be positioned on south facing elevations to maximise solar gain, on the most visually exposed part of the building and could therefore result in the building becoming more reflectively visually. The location of these are not shown on any of the proposed plans.
- 4.11 Reference is made in para 4.63 to a standards and minimising light spill. However, no lighting scheme is set out in the suite of plans, nor is there a lighting chapter in the PEIR. Whilst Chapter 14 provides a qualitative assessment of night-time character, an understanding of effects on the night-time character cannot be judged at this stage.
- 4.12 Para 4.65 states that: *“Landscape proposals will form an integral part of the Proposed Development to provide treatments for the perimeter and internal green spaces.”* This statement is false and hugely misleading, as the building footprint and ‘limits of deviation’ associated with the built fabric together with the means of access occupy a significant area of the site, with only spaces left over after squeezing in the built form given over to landscape proposals (as shown on the Illustrative Parameter Plan Figure 4.1 and Illustrative Site Layout Figure 4.2). Furthermore, these landscape proposals are shown in the legend on Figure 4.1 as including surface water drainage too, although no detail is provided on the location and extent for the drainage and associated tanks. In proposing the uses of tanks, this will further limit opportunities for planting. In reality, the landscape proposals comprise the existing bank of trees on the western edge of the site (although there is no reference on whether these are proposed to be retained); a space left over between the movement corridor and the western boundary which has been informed by vehicle tracking; the retention of the existing bund to the eastern boundary of the site; the extension of the eastern bund to the south-eastern corner, in a location where visual receptors are limited. There is no bunding proposed between the existing western boundary vegetation and the access corridors to minimise views of the proposed vehicle movements both in and out of the facility on receptors on The Street. The land to the north is proposed as a construction laydown area only and no further landscape measures are proposed in that area. Furthermore, the proposals plans contained in Chapter 4 do not set out any additional mitigation measures, such as planting, over and above the bunding.

#### **Chapter 5 – The Need for the Proposed Development, Site Selection, Alternatives and Design Evolution.**

- 4.13 At the third bullet point of para 5.3, it makes reference to Overarching National Policy Statement for Energy EN-1 in relation to avoiding significant harm and development within nationally designated landscapes. Paragraph 5.9.8 of EN-1 states that: *“Virtually all nationally significant energy infrastructure projects will have effects on the landscape. Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.”* EN-1 goes on under the mitigation sub-section para 5.9.21 to state that: *“Reducing the scale of a project can help to mitigate the visual and landscape effects of a*

*proposed project. However, reducing the scale or otherwise amending the design of a proposed energy infrastructure project may result in a significant operational constraint and reduction in function...There may, however, be exceptional circumstances, where mitigation could have a very significant benefit and warrant a small reduction in function..."*

- 4.14 Para 5.9.22 of the EN goes on to state: *"Within a defined site, adverse landscape and visual effects may be minimised through appropriate siting of infrastructure within that site, design including colours and materials, and landscaping schemes, depending on the size and type of the proposed project. Materials and designs of buildings should always be given careful consideration."* Landscaping can include off-site planting, although none is proposed for this project, as there is a reliance on existing tree planting, which the developer does not control.
- 4.15 There is no contextual analysis that has helped shape the design of the proposed tall building and development overall, nor the selection of materials. It is therefore questioned how the proposed development reflects and addresses the guidelines set out in the various tiers of landscape character assessment.
- 4.16 It is clear that the shape of the site has informed the orientation of the building, rather than the visual assessment. Para 5.25 states that: *"The applicant has sought to minimise the landscape and visual impact of the Proposed Development through siting and exploring options for reducing scale and massing of buildings and structures."* The para then goes on to list a series of design objectives." Clearly, none of these objectives have been met as evidenced in the residual moderate and major landscape and visual impacts in the LVIA Chapter 14. The design measures have resulted in an industrial scale building, the widest bulk of which faces the range of visual receptors to the south and north (at Barton Stacey and Longparish respectively); the administrative office and eastern workshop parts of the building are visible as boxes above the intervening trees present beyond the site to the south; there is no 'successful' landscape strategy other than some left over spaces around the building.
- 4.17 Para 5.32 mentions the use of 3D modelling and photomontages in the preparation of the Landscape and Visual Impact Assessment (LVIA) however nowhere in the PEIR documentation that includes any of this visual material to understand the design decisions that have been made. Para 5.33 sets out that views have been modelled from the north, south, east and west and from within the North Wessex Downs AONB. However, there is no reference to viewpoint numbers and again these images are not contained within Chapter 14 (LVIA) to assist the reader, in fact, para 14.56 of Chapter 14 states that: *"Photomontages and wirelines (visualisations) of the Proposed Development have not been undertaken for the PEIR, but will be undertaken for the ES."* The process of assessing visual effects is therefore questioned.
- 4.18 Whilst the location of the site in terms of existing vegetation present on the site boundaries and beyond the site to the south assists in screening the lower, more active levels of the site, the upper sections which sit significantly above the treeline will still be visible. Para 5.34 sets out that technical studies were carried out to review the height of the building and that through design interrogation and reduction of site levels, the building could be reduced by 9m overall. When dealing with a building of some 55m above ground levels, this reduction, whilst welcomed, still means that the proposed building sits significantly above the current treed horizon, in a landscape where large sheds (industrial, commercial or agricultural) all sit below the treed horizon and therefore sit down in the landscape and where their zone of visual influence is minimal. These measures therefore do not result in a building which sits below the treed horizon consistent with the character of the local industrial built form.

- 4.19 The first bullet point of para 5.35 states that the proposal was to set the building: “... *further back from the Site’s southern boundary to reduce its visual impact when viewed from the south.*” Notwithstanding the fact that the existing topography slopes marginally up from south to north, setting a building of this scale and mass back a few meters is simply not going to reduce its visual impact to the south. The only way to reduce the visual impact to the south is to set this building into a valley and to use the existing topography to do this. The measures then proposed under the second bullet point, including flint walls, mounds, planting, creation of a ‘civic forecourt’ are all minor measures which may address localised views in close proximity to the built form, but simply do not address the industrial scale and mass in views from the local and wider landscape.
- 4.20 Para 5.39 refers to testing the design in viewpoints as shown in Figures 5.2 and 5.3. Figure 5.2 is actually a plan which is then represented as a birds eye sketch view in Figure 5.3. Figure 5.3 therefore does not reflect a view from any of the visual receptors identified in Chapter 14.
- 4.21 Figure 5.4 shows some photomontages of a particular view (which through interpretation of the LVIA Chapter 14 is understood to be an elevated view from Barton Stacey) it clearly shows that even in the curved form, the building breaches the treed horizon and is a new uncharacteristic and overly dominant element in the view, making the traditional landmark building of the church be the subservient element. Again, this goes back to the point that the scheme does not reflect local character.
- 4.22 Overall, there is an over reliance on the existing landscape beyond the site to mitigate the impacts of the scheme. At the site level, the landscape response offers little in terms of operation due the functional requirements of the building. Similarly, variation in the form of the scheme does little to mitigate the required mass.

#### **Chapter 14 – Landscape and Visual Impact Assessment.**

- 4.23 Para 14.5 under introduction refers to Type 1 effect but does not describe what this is. Furthermore, this is not explained in Chapter 2 – Assessment Methodology and Significance Criteria.

#### **Landscape Baseline**

- 4.24 Whilst para 14.31-14.32 refers to the principles of the North Wessex Downs AONB, it fails to recognise the series of key issues at para 11.1 of the AONB Management Plan 2014-2019 which, under landscape, the first bullet point of which states: “*The potential for development beyond the AONB boundary to visually damage or undermine the scale and critical qualities of landscape character areas.*”

Furthermore, at para 11.6 of the Management Plan on Development, one of the key issues is identified as: “*Potential for certain forms of development to intrude on the wider landscape, including masts, pylons, wind turbine developments, photovoltaic schemes, and minerals and waste schemes, threatening the senses of remoteness and tranquillity, and landscape quality and heritage assets.*”

- 4.25 Para 14.39 states that both summer and winter inspections have been carried out during 2019. Despite the above, para 14.55 states that winter photography has not been carried out and will be completed in the coming months. Para 14.255 under visual baseline however includes a statement of the changes that occur in the winter but does not provide the evidence in this document to substantiate. The consistency in the evidence to reach the conclusions is therefore questioned.



- 4.26 Para 14.40 relating to methodology, third bullet point sets out that the plume is not considered in the impact assessment as it is *“only expected to be visible intermittently”*. The assessment therefore does not represent the worst-case scenario and is misleading. This scenario should also be considered.
- 4.27 Table 14.2 under consultation sets out a response to the comments received from the Planning Inspectorate (PINS). ID 4.9.4 sets out that the ES L&V chapter should cross reference with the archaeology and cultural heritage chapter. AECOMs response is that the archaeological and cultural heritage impacts are presented in Chapter 13 of the PEIR. This response does not address the point. ID 4.9.5 set out that the assessment should address impacts from the potential illumination of the plumes during the night-time. AECOMs response is that it *“cannot be readily quantified”*, which is not an acceptable response. ID 4.9.7 sets out that the ES should explain how the design and proposed materials have been selected with the aim of minimising impacts to landscape and visual receptors. AECOMs response is that this will be included in the ES, however, this information should be provided as this consultation stage. There is no substantiation in Chapter 4 on how the materials selected minimise landscape and visual impact.
- 4.28 Para 14.56 under limitations and assumptions states that: *“Photomontages and wirelines (visualisations) of the Proposed Development have not been undertaken for the PEIR, but will be undertaken for the ES.”* The process of assessing visual effects is therefore questioned. How has the assessor determined whether the scheme and how much of the proposed development will be visible from each receptor. The assessment of effects in this chapter of the PEIR is therefore questioned.
- 4.29 Under the section on settlement and land use within the 25km study area, para 14.94 states that the local villages, including Barton Stacey *“is located within a valley landform”*. This is factually incorrect, as the eastern section of the village lies on rising ground on the lower slopes of a localised ridgeline broadly between 70 and 75m AOD (and therefore elevated above the Wheelabrator site levels).
- 4.30 Paras 14.114 -14.122 refers to areas of woodland but does not take account of the national tree removal measures due to ash dieback. More clarity is required on the detail of the species make-up of the woodland, which is relied upon to reduce the visual effects of the project.
- 4.31 Under the section on National Character Areas (para 14.143-14.148) it fails to set out the following key characteristics of NCA 130 Hampshire Downs that are pertinent to the local area (emphasis added):
- *“The rolling, elevated, chalk arable downland has an **open, exposed character that provides open skies and long-distance views.***
  - *The **area’s distinctive appearance derives from the use of chalk cob (in the west), weatherboarded timber frame and small, handmade local brick with flint in traditional rural buildings and walls surrounding farm courtyards, with thatch surviving in many places...**”*

Under the description of the NCA it goes on to state that: *“Traffic has a significant impact on the landscape, but, away from these roads and the main towns, levels of tranquillity and remoteness remain relatively high, particularly in the area north-west of Andover, towards the South Downs, and in the river valleys. These features are all valued by walkers, cyclists and horse riders who are well served by a dense rights-of-way network. Offroad cycling is*

*very popular, attracting large numbers using the specific routes promoted by the county council. There are several, well-used, long-distance routes....”*

The LCA also identifies that the: *“... heavily-used trunk roads (the A303 is nicknamed the “Highway to the Sun” because of its use by holidaymakers) cut across and over the contours of the Downs, often with significant visible and audible impact on the landscape, and are, in many parts of the area, dominant and to some, alien features.”*

- 4.32 Under the Hampshire Integrated Character Assessment section, para 14.160 on character area 8E within which the site sits, fails to recognise para 7.4, which sets out the key quality is defined as (emphasis added): ***“An open, rolling and expansive landscape, with long panoramic views over a regular pattern of large arable fields. It is often viewed and experienced from direct and fast straight roads and prominent rights of way associated with ancient transport routes.”*** One of the treats to this key quality is identified as where: ***“Tall structure development can often be very visible – reducing the rural character of the landscape.”*** Opportunities include to address this point: *“Take in to account and identify the main exposed ridges and downland in new development proposals and the main visual receptor sites. Local opinions could be sought for particular valued views to help with identifying important receptor sites.”*

Whilst the proposed development lies to the south of a major watershed ridgeline between the River Test to the north and the River Dever to the south and therefore does not lie on an exposed ridge, due to the proposed height, scale, mass it will not sit below this exposed ridgeline to minimise its impact. The proposed development is therefore a threat to the character of this part of the Hampshire landscape.

- 4.33 Whilst para 14.2 of the Chapter sets out that landscape effects relate to changes in features, aesthetic and perceptual qualities, there is no further statements drawing out the conclusions of these qualities from the tiers of landscape character. Furthermore, there is no statement relating to the time depth of the landscape. The baseline assessment and therefore knowledge of the local area is lacking.

#### **Visual Baseline**

- 4.34 The visual baseline fails to acknowledge that the existing MRF and IBA are set down in the landscape, below the visual horizon. Whilst the text describes winter views, no photographic evidence of these are provided in the document.
- 4.35 We dispute the visibility of the chimney stack at Harewood Industrial Estate at para 14.315. It is the occasional plume that is visible, not the stack.
- 4.36 Para 14.316 and 14.322 states that views from the A303 and A34 are difficult to capture. However, these can be recorded using serial vision photography, captured by the passenger of the car. Therefore, this statement is misleading.
- 4.37 In terms of the summary of the visual context, the statement at para 14.323 that it is low lying in the landscape is incorrect, it lies on the southern slopes of a watershed ridgeline at 60m AOD at its lowest level, between the River Test and the River Dever. Furthermore, it does not lie away from large groups of visual receptors, as it is located between the villages of Longparish (a linear settlement) to the north and Barton Stacey to the south.
- 4.38 Paragraph 14.324 fails to recognise that the location of the site is discernible from elevated vantage points, over Longparish, from the north.

- 4.39 Paragraph 14.334 sets out the type of visual receptor, but fails to identify receptors at their workplace (at the Raymond Brown site; the Barton Stacey services; agricultural workers); those using areas of public open space at Barton Stacey (e.g. those using the trim trail and being adjacent to the Barton Stacey Primary School and its associated play ground as referred to in Table 1 of Plate 5.1 of Appendix 14.3 – LVIA Consultation); and those using local roads (such as the road through Forton and Longparish); those visiting communal buildings such as the village church. Furthermore, the range of visual receptors is not co-ordinated with those set out in Table 3.1 of Chapter 3. The assessment does not take account of range of visual receptors included in Table 3.2 of Appendix 14.2 – LVIA methodology. The assessment therefore doesn't follow its own methodology, nor has been co-ordinated with other chapters.
- 4.40 In terms of the section on Design Measures and Impact Avoidance, the response is set out at paras 4.15-4.22 of this commentary relative to the statements made in Chapter 5.

**Assessment of Effects (and in relation to table 14.4 – summary of effects)**

- 4.41 There is no conclusion to the assessment of effects at the site level at the construction stage and the operational stage. This is clearly a significant omission due to the replacement of a greenfield site to that of development.
- 4.42 The assessment fails to consider all receptor types as set out above in para 4.39. There is an omission to assess the effects of the recreational users of the Cricket Ground at Hurstbourne Priors and visitors to the Church. Furthermore, as required by NPS EN-1 Paragraph 5.9.7: *“The assessment should include the visibility and conspicuousness of the project during construction and of the presence and operation of the project and potential impacts on views and visual amenity.”* The visual assessment does not address conspicuousness and changes to visual amenity, it only cites how visible it will be.
- 4.43 Para 14.438 sets out that the triangular laydown land to the north of the development site would be returned to grassland. However, para 12.113 of Chapter 12 – Ground Conditions states relative to this parcel that: *“It is currently proposed that the material excavated for the bunker on the main site will be used on the laydown area. This material (estimated to be a maximum of 50,000 m3) will raise the ground level and potentially form landscape features.”* Chapter 4 at para 4.92 states that this quantum is to be 75,000m3. No assessment of this land raising has been carried out in Chapter 14.
- 4.44 In terms of the statement in the Hampshire Landscape Character Assessment for LCA 8E: Mid Hampshire Open Downs where: *“Tall structure development can often be very visible – reducing the rural character of the landscape.”* The assessment sets out that the proposed development would reduce the sense of remoteness and scenic quality (para 14.455) but underplays the fact that the introduction of a massive industrial scale building will significantly reduce the perception of the rural landscape (as the adjacent commercial sheds are well concealed and set down in the landscape, not breaching the treed horizon). Furthermore, there is no justification on how the proposed building contributes positively to the character and the quality of the area (as set out at para 2.5.50 of NPS for Renewable Energy Infrastructure – EN-3 and paras 127 and 170 of the NPPF).
- 4.45 The statement at para 14.490 that the curved architectural form would reduce the perception of a utilitarian structure, whilst reflecting the wooded skyline of the top of the treeline and the rolling landform of the valley (a statement which is repeated throughout the year 1 visual impact section) is wholly misleading and underplaying the effect. In reality, approximately two thirds of this building would be visible above the treed horizon, there is

no reflecting of a wooded skyline which is green and where the west to east orientation accentuates the length of the buildings west to east profile.

- 4.46 In terms of the assessment of effects on RV5 at year 1 and year 15 (at para 14.491 and 14.568) the effects have been underplayed. It is considered that (using the AECOM methodology and terminology) the development would have a high impact resulting in a major adverse effect on this receptor.
- 4.47 There is no evidence to substantiate the statement that the views from the conservation area of Barton Stacey would be screened (para 14.492).
- 4.48 Whilst we concur with the statement of effect as major adverse relative to RV12, however, there is no consistency with the assessment of effects. The same judgement surely should be made on RV11 as RV12 (paras 14.399 and 14.499). Similarly, if the judgement is made on RV11 and RV12 that these receptors are of high sensitivity and medium impact, the same conclusions should therefore follow for RV14 whereby effects would be major adverse rather than the moderate adverse attributed by AECOM. Similarly, for RV21 and RV22 should be the same as RV23 (Para 14.503 and again at para 14.580).
- 4.49 The assessment of effects at year 15 at the site level needs to be substantiated, with further explanation on the statement that the plume would not be perceived (para 14.539). The classification of landscape and visual effects is set out at para 4.1 of Appendix 4.2 – LVIA methodology, but there is no reasoning behind why the plume is not considered at Year 15. There is no further information contained in Chapter 4 – The Proposed Development, which substantiates the lack of plume at Year 15. There may be some maturation of the existing vegetation, but this would not be significant to minimise the effects and furthermore does not consider the issues around tree removal and ash dieback. There is no vegetation proposed on Fig 4.2 Illustrative Site Layout. There is an area proposed for ‘landscaping’ on Fig 4.1 Illustrative Parameter Plan and no assumptions set out in LVIA chapter on what type of vegetation has been assessed, therefore the use of vegetation to minimise visual effects would be limited to those receptors in close proximity.
- 4.50 The assessment of effects on RV11, 12 and 13 wouldn’t change at year 15. These would all remain as year 1. Furthermore, the assessment of effect on RV14 is missing.
- 4.51 There is little evidence to convince the reader that effects on the visual receptors in Longparish would reduce from minor adverse to neutral (paras 14.575-14.577). Furthermore, it appears that this section is incomplete.
- 4.52 In terms of the statement regarding the increase of height of intervening vegetation screening (para 14.581) views from VP26, the developer is not in control of this vegetation, but furthermore, this screening could be removed as a result of forestry practices to address ash dieback. This needs to be factored into the assessment. The worst case should be assumed and therefore no change between Year 1 and Year 15 for these receptors.
- 4.53 Overall therefore, the landscape and visual effects have all been identified as adverse. There is not a single landscape or visual benefit arising from this project.

#### **Residual Effects**

- 4.54 This section appears to be incomplete.

### **Cumulative Impact Assessment**

- 4.55 The connection route with the national grid is yet to be determined and has not been considered in the cumulative impact assessment. At this stage of the project, this is a significant omission.

### **Conclusion**

- 4.56 Para 14.697 statement that the magnitude and geographic extent would reduce at year 15. This simply overplays the reduction.
- 4.57 Para 14.703 the measures described in the bullet points in our opinion do not address the remaining moderate and major adverse effects arising from the scheme. There is a reliance on the combination of features beyond the site providing the mitigation, which may not be present in perpetuity.

### **Appendix 14.1 – Legislative and Planning Policy Context**

- 4.58 There is no statement in this section setting the assessment of the scheme against policy.

### **Appendix 14.2 – LVIA Methodology**

- 4.59 The criteria used to determine magnitude of impact (Table 2.4 and 3.4) is overly simplistic. It doesn't consider duration, permanence, geographic extent etc.

### **Appendix 14.3 – LVIA Consultation**

- 4.60 Plate 5.1 includes an extract from the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA 3) which lists representative, specific and illustrative viewpoints. Only representative views have been included in the assessment and there is no statement setting out the reasons why these are only representative.
- 4.61 In terms of the Barton Stacey Parish Council Response at section 6 in terms of the inclusion of the additional viewpoint from the westbound slip road on to the A303. The justification for excluding this view is not substantiated when the same is true of viewpoint 57.
- 4.62 With regard to Longparish Parish Council Response at section 9 in terms of the inclusion of the view from Middleton House which is identified in the Conservation Area Appraisal as an important view, the fact that this is not publicly accessible is a weak argument. The Middleton Estate Office operates within the grounds of Middleton House and is therefore a view relating to people in their workplace. In terms of views from the A303, Para 14.316 and 14.322 of the LVIA Chapter states that views from the A303 and A34 are difficult to capture. However, these can be recorded through the use of serial vision photography, captured by the passenger of the car. It therefore should not be dismissed.

### **Commentary Conclusion**

- 4.63 Whilst much is made of the mitigation measures proposed, these actually are small cosmetic measures. There has been absolutely no regard to the characteristics, guidelines and strategies set out in the tiers of landscape character assessments. Therefore, not surprisingly, due to the combination of site location, shape and surrounding landscape characteristics, moderate and major adverse landscape and visual effects remain. No beneficial landscape and visual effects have been identified.