

Peter Radmall Associates
environmental and landscape planning



Proposed Development of Employment Uses
Former Furtho Pits, Old Cosgrove Road, Old Stratford
Northamptonshire

LVIA Review

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Executive Summary

- A.1 This review of the applicant's LVIA has raised a number of concerns relating to its reliability and the assumptions on which it has been based. These are summarised in the following paragraphs.
- A.2 The terminology used for some of the published character areas can be misleading. The site is located within the valley of the Dogsmouth Brook, a tributary of the River Great Ouse, not within the catchment or floodplain of the River Tove. The categorisation of the Ouse valley as an Urban River Valley reflects its wider setting to the south, not its intrinsic character, which is predominantly rural.
- A.3 The LVIA has under-stated the value and sensitivity of the site, particularly its central and eastern parts, with the result that the landscape impact of the development has been under-reported. This appears to reflect what the LVIA refers to as the "fallback" position of the site's allocated status, although this does not reflect its baseline condition or its relationship to the GUC Conservation Area and the Tove Valley SLA.
- A.4 A technical review of the visual material supporting the LVIA has indicated that the ZTV, photography, annotated photos and montages cannot be relied upon for assessment purposes. The images presented in the photomontages are of unknown accuracy and are little more than "artist's impressions".
- A.5 The conclusions drawn in the LVIA on the basis of this information may be similarly of limited reliability, unless/until it has been verified by the submission of further information that responds to the points raised in the technical review.
- A.6 Whilst the coverage of viewpoints seems reasonable, it is possible that locations representative of residential receptors on the fringes of Old Stratford, Stony Stratford and Cosgrove may have been overlooked.
- A.7 The definition of significance for landscape and visual effects (above Moderate) is less onerous than for all other topics assessed in the ES (Moderate and above). The LVIA provides no explanation for this disparity.
- A.8 The LVIA concludes that none of the effects on landscape character, the setting of heritage assets or residential receptors are considered to be significant. In view of the inconsistency noted above, this conclusion should be questioned.
- A.9 The LVIA assumes a very high degree of effectiveness for the proposed landscape mitigation (a 95% reduction in the number of viewpoints considered to be affected significantly between Year 1 and 10). My own assessment for one viewpoint (VP10), based on the visualisations in the LVIA, suggests that this is an over-statement that is not borne out by the evidence.

- A.10 Over-stating the effectiveness of mitigation is consistent with the LVIA's downplaying of the urbanising impact of the development on the assessment views. In the majority of cases, the development would introduce built development into views where it is currently absent or inconspicuous, and sometimes to a degree that would be intrusive.
- A.11 Logistics uses typically require relatively high levels of site illumination, the impact of which has not been explicitly or fully assessed (e.g. in the form of night-time views), including those from heritage assets.
- A.12 The LVIA refers repeatedly to the beneficial effects of the country park. However, these effects do not amount to a significantly beneficial effect for EIA purposes. Neither does the country park appear to make a material contribution to mitigation of the harmful effects of the built development.
- A.13 Noting the above, a review has been undertaken of the development's compliance with the relevant policy tests in South Northamptonshire Part 2 Local Plan, 2011-29, which is understood to remain valid at this time.
- A.14 Whilst there is no policy explicitly protecting the landscape character of the district, Para 11.1.3 of the Local Plan states that: *All landscapes in the district are considered to have character and particular distinctive features to be conserved, positive characteristics to be enhanced and detracting features to be mitigated or removed. All development proposals should have regard to other policies in this Plan to ensure that any adverse impacts on landscape are properly mitigated.*
- A.15 The review indicates that the "distinctive features" and "positive characteristics" of the site/local area have been under-reported in the LVIA. The accompanying visualisations demonstrate that the "adverse impacts on landscape" have not been "properly mitigated", which may not even be achievable.
- A.16 The current proposal effectively amounts to an infill development between Old Stratford and Cosgrove. Such development clearly does not "*maintain the individual identity of towns and villages*", resulting in "*physical coalescence that would harm this identity*", contrary to criterion a of Policy SS2: General Development and Design Principles.
- A.17 The development also fails to "*demonstrate compatibility and integration with its surroundings and the distinctive local character of the area*", as required under criterion b. The proposed landscape treatment would not be "suitable", as required under criterion d, if suitability is defined as "capable of mitigating adverse effects".
- A.18 Policy NE4: Trees, Woodlands and Hedgerows requires "*suitable replacement planting*" to be proposed for any "*unavoidable*" loss of hedgerow or trees. If "suitable" is defined as "capable of mitigating adverse effects" (see above), this clearly has not been achieved in relation to the visual effects.

- A.19 The development adjoins, and is located within the setting of, the Grand Union Canal Conservation Area. The landscape impacts identified in the LVIA and this review are clearly capable of causing significant harm to that setting, and therefore fall within the scope of Para 3 of Policy HE6: Conservation Areas, which states that: *Where harm would be caused, including through development proposals outside of a conservation area, which have an adverse effect on the setting of the conservation area or any views into or out of the area, such harm will need to be weighed against the public benefits of the proposals.*
- A.20 Para 5 of Policy ALP5: Land at Former Furtho Pit relates to “key site-specific design and place-shaping principles”. Principle e, requires “detailed strategic landscape and visual impact assessments of the whole site, to deliver a high-quality landscaped setting within and around the boundary of the proposals.”
- A.21 Whilst an LVIA has been prepared, the qualifying term “detailed strategic” is not defined, and therefore compliance with it cannot be confirmed. Neither can it be confirmed whether the “landscaped setting” of the proposal is “high-quality”, since this is also undefined. What can be confirmed, however, is that this setting is not sufficient to adequately mitigate the visual harm arising from the development, due to the excessive scale of its buildings.
- A.22 Although the policy identifies no specific landscape/visual or urban design tests that the development should meet, Para 1 refers to “mixed employment generating development” and “a variety of employment types”, defined in Para 3.a as B1, B2 and B8 uses. Since these uses have different spatial requirements, this mix would be expected to give rise to a design response based on buildings of varied scale.
- A.23 By contrast, the proposal is currently understood to be predominantly reliant on B8 uses. It is therefore not compliant with the use-mix requirements of the policy. Whilst this is primarily a planning matter, it clearly has implications for the landscape/visual impact of the development, when the excessive scale of the proposed buildings exceeds the capacity of the landscape to accommodate them without what GLVIA3 refers to as “undue consequences” [GLVIA3, 5.40]¹.
- A.24 Logistics developments tend to give rise to a uniform typology of “warehouse” development. This can be particularly intrusive where skylines are open or influenced by treelines, and where existing development is either a relatively minor influence on views or is predominantly of a residential, smaller-scale and mixed character. That is the case here, and reinforces the concerns about the assessment process and the reliability of the visual material reported in this Review – and hence the acceptability of the proposal and its compliance with Policy ALP5.

¹ Guidelines for Landscape and Visual Impact Assessment, LI/IEMA, 2013

countryside), and to the north by Stratford Road (beyond which lie several residential properties).

- 1.6 The western and central parts of the site, amounting to c43%, are proposed to be developed for employment (B2/B8) and supporting uses, with an emphasis on logistics businesses. These uses would be accessed from a new spine road forming a junction with the A508. The remainder (57%) of the site, east of the Old Stratford Arm, would become a Country Park. This would accommodate attenuation lakes to manage runoff from the site, and is shown as brown shading on Figure 1.1. The illustrative masterplan is shown in **Figure 1.2** below.

Figure 1.2: Illustrative Masterplan



Scope

- 1.7 The purpose of this review has been to:
- Review the relevant application docs/drawings/evidence base;
 - Visit the application site and selected parts of the surrounding area and viewpoints;
 - Review the degree to which the LVIA is compliant with best practice;
 - Comment on whether its findings seem reliable;
 - Identify any concerns, queries or deficiencies; and

- Set out the conclusions of the above as advice to FDOG.

Limitations

1.8 The following limitations should be noted:

- This review does not purport to be an LVIA in its own right, and does not attempt to identify and categorise all the potential effects.
- It places a degree of reliance on the technical material (ZTV², photography and visualisations) submitted in support of the LVIA, notwithstanding the criticism of this material set out by MSenvision in **Appendix A**.
- The fieldwork undertaken for this review was confined to public roads and rights-of-way (PRoWs).
- Issues such as biodiversity or cultural heritage have not been addressed, except where they materially influence matters such as landscape value.
- Images have been reproduced from the LVIA and other application documents in the public domain, the copyright of which is assumed to reside with Frontier Estates and their consultants.

1.9 Compliance with best practice has been assessed in relation to the Guidelines for Landscape and Visual Impact Assessment (GLVIA3, LI/IEMA, 2013)³, together with experience drawn from involvement in a large number of LVIAs, reviews and planning appeals. In order to simplify the review process, Peter Radmall Associates have applied their own compliance checklist, as set out in **Section 3**.

² Zone of theoretical visibility

³ And Technical Guidance Note LITGN-2024-01: Notes and Clarifications, August 2024

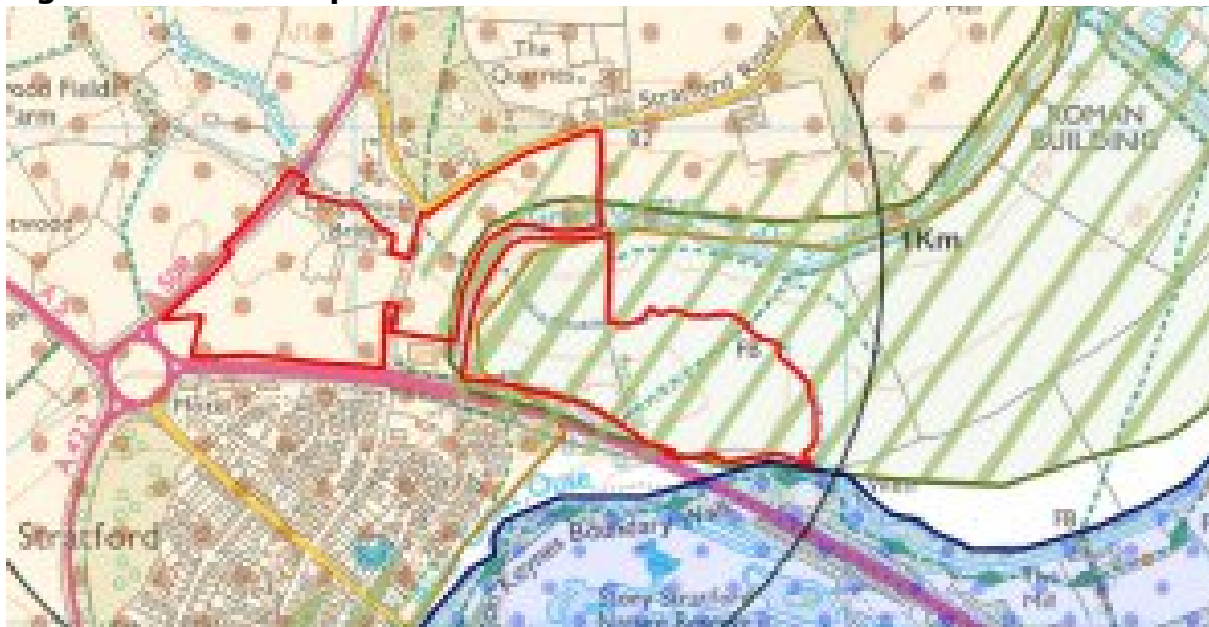
2. Landscape and Visual Context

Landscape Character

2.1 Table 6.06 of the LVIA sets out the published landscape character types (LCTs) and areas (LCAs) that relate to the site. Selected LCAs are shown on LVIA Figure 6.7, an extract from which is reproduced in **Figure 2.1** below, and may be summarised as follows:

- County-level LCTs 6: Undulating Claylands and 17: River Valley Floodplain
- County-level LCAs 6a: Tove Catchment and 17b: River Tove Floodplain
- Milton Keynes LCT 2: River Valley and LCT 2c: Ouse Urban River Valley

Figure 2.1: Landscape Character Area Plan



Green cross-hatch = River Tove Floodplain
Brown stipple = Tove Valley
Blue stipple = Ouse Urban River Valley

- 2.2 The nomenclature of these LCTs/LCAs can be misleading. As mentioned previously, the site is located within the valley of the Dogsmouth Brook, and therefore does not form part of the Tove catchment. The floodplain in which the eastern part of the site is located relates to the Dogsmouth Brook and the adjoining River Great Ouse, not the River Tove.
- 2.3 The site occupies a transitional location where the valley of the Dogsmouth Brook widens as it flows south-eastwards from the locally-elevated Undulating Claylands, before merging with the floodplain of the Great Ouse. Reflecting this, the LVIA divides the character of the site roughly into two halves, with the western and central parcels (where built development is proposed) forming part of the valley

slopes, and the eastern parcel (where the country park is proposed) opening out into the floodplain.

- 2.4 In addition, the Ouse Urban River Valley categorisation of MK LCT2C reflects its setting to the south, which comprises the built-up areas of Wolverton and Stony Stratford. The intrinsic character of the valley itself, dominated by the green corridor of its floodplain and adjoining slopes, remains predominantly rural. Urban influences are confined to the A5 and occasional glimpses of surrounding neighbourhoods and the MK Waste Recovery Park at Old Wolverton.

Landscape Sensitivity

- 2.5 In accordance with best practice, the LVIA assesses the landscape sensitivity of the site as a combination of susceptibility and value. Susceptibility is addressed at LVIA 6.5.31-34 and is considered in the LVIA to be as follows:

- Western/central parcels: Medium; and
- Eastern parcel: Medium/High

- 2.6 Landscape value is addressed in LVIA Table 6.07 and is considered in the LVIA to be as follows:

- Western/central parcels: Low/Medium; and
- Eastern parcel: Medium.

- 2.7 Reflecting the above, sensitivity is addressed at LVIA 6.5.30 and is considered to be as follows:

- Western/central parcels: Low/Medium; and
- Eastern parcel: Medium/High

- 2.8 This conclusion is critical to the outcome of the landscape assessment, since the LVIA seeks to demonstrate that:

- the greatest adverse impact (from introduction of the employment units and infrastructure) would occur on what the LVIA considers to be the least sensitive part of the site; whilst
- the least adverse/most beneficial impact (from the country park) would occur on what the LVIA considers to be the most sensitive part of the site.

- 2.9 However, as discussed below, the judgements underpinning this conclusion should be questioned, particularly in relation to landscape value and the site's relationship to the Grand Union Canal Conservation Area and the Tove Valley Special Landscape Area.

Landscape Value

- 2.10 The LVIA's assessment of landscape value (Low/Medium to Medium) concludes that no part of the site is sufficiently valued ("high") to be regarded as a "valued landscape" for the purposes of NPPF 187 (a). As the LVIA confirms, no part of the site falls within a designated landscape.
- 2.11 However, as shown on LVIA Figure 6.3: Designations Plan, an extract from which is reproduced in **Figure 2.2** below, the Old Stratford Arm, which separates the central and eastern parts of the site, lies within the GUC Conservation Area (CA). Views towards the CA from the elevated southern edge of the site adjacent to the A5 (within the eastern parcel) are identified as "important views" in the CA Appraisal.
- 2.12 In addition, LVIA Figure 6.4: Opportunities and Constraints Plan, an extract from which is reproduced in **Figure 2.3** below, identifies two "sensitive cross-valley views" locations within the site: One from the PRoW crossing the eastern parcel, and the other from the PRoW close to the elevated north-eastern corner of the central parcel. Both of these views are towards the GUC CA, and are interrupted to varying degrees by trees along the Old Stratford Arm. The CA forms part of the site boundary, allowing its visual influence to extend across parts of the eastern and central parcels of the site.

Figure 2.2: Designations Plan



The vertical dark-blue hatching which traverses the site is the GUC Conservation Area
The pale brown area to the east of the site is the SLA
The yellow arrows show protected views from the GUC CA Appraisal

- 2.13 Figure 2.2 shows that the southern end of the Tove Valley Special Landscape Area (SLA) extends across the floodplain and valley slopes north of the Great Ouse to the east of the site. The boundary of the SLA comes to within c75m of the site. Most of this part of the SLA, defined to the north/north-east by the Old Stratford Arm and the Iron Trunk section of the GUC, falls within the ZTV for the development (LVIA Figure 6.6).

Figure 2.3: Opportunities and Constraints Plan



- 2.14 SLAs are a longstanding non-statutory designation, defined as “*landscapes that are considered to have distinctive and special qualities that are renowned at district level and are of local landscape value*”. They have been carried over into the Regulation 18 version of the WN Local Plan, protected by draft policy BN7.
- 2.15 In view of the site’s proximity to and intervisibility with the GUC CA and the SLA, the LVIA has underplayed the value and sensitivity of the site, specifically in relation to the central and eastern parcels. In its currently undeveloped condition, the site complements the special qualities and setting of both the SLA and the CA. In addition, its proximity and visibility, together with its degree of public access (which is evidently well-used), add a further layer of value.
- 2.16 In this context, the site – or at least its central and eastern parts – could potentially qualify as a locally valued landscape. If so, the LVIA has understated its sensitivity and the development’s severity of impact.
- 2.17 The framework of judgment that the LVIA applies is relevant to understanding its conclusions. LVIA 6.1.6 refers to the allocated status of the site as representing a “fall-back position” for assessment purposes. The influence that this fallback position has had on the LVIA is not clear, although it appears to have allowed the value and sensitivity of the site to have been downgraded, and thereby the significance of the landscape effects.
- 2.18 What is clear is that this fallback position does not reflect the existing baseline status of the site as an (albeit partially modified) part of the countryside, which contributes to the “intrinsic character and beauty” of the local area (to use the terminology from the NPPF). Reflecting this enhanced value for the central and eastern parts of the site, their sensitivity should be considered to be Medium and

High respectively (compared to the Low/Medium and Medium/High reported in the LVIA).

Viewing Opportunities and Visual Receptors

- 2.19 The LVIA has based its visual assessment on a ZTV, site visits, representative photos and visualizations. The technical basis for this material has been reviewed by MSenvision, a specialist consultancy, and is reported in **Appendix A**. Whilst the use of such material is consistent with good practice, the MSenvision review raises a number of concerns, as summarised in **Section 4**.
- 2.20 As a result, the ZTV, photography, annotated photos and montages cannot be relied upon for assessment purposes. On the basis of the information in the LVIA, the images presented in the photomontages are of unknown accuracy and little more than “artist’s impressions”.
- 2.21 The conclusions drawn in the LVIA on the basis of this visual information are similarly of limited reliability, unless/until it has been verified by the submission of further information that responds to the points raised in the technical review.
- 2.22 The visual assessment identifies 37 representative views. The LVIA considers the majority (87%) of these to be of High sensitivity, most of which relate to recreational walkers on PRowWs. This is a robust approach, and reflects the high level of amenity derived from local PRowWs and related informal paths/open space, including parts of the site.
- 2.23 Notably, however, only three of the viewpoints relate to residential receptors. This understates the partially built-up character of the wider setting of the site, which includes the fringes of Old Stratford, Stony Stratford and Cosgrove. A high proportion of the recreational walkers that will probably be the largest visual receptor group experiencing the impact of this development will be residents of these areas and therefore of intrinsically high sensitivity

3. Compliance Checklist

- 3.1 The LVA has been reviewed in terms of its compliance with the main requirements of the process set out in GLVIA3 and prevailing practice; these are presented in **Table 1** below. Responses that raise queries/concerns, or are otherwise worthy of note, are shown as shaded cells and are addressed in **Section 5**.

Table 1: Compliance Checklist

Criterion	Response	Comment
1. Overall Approach		
1.1 Does the assessment distinguish between landscape and visual effects?	YES	
1.2 Are the methodology and terminology clearly explained?	YES	Ref LVIA 6.3, specifically Tables 6.01/02/03/04/05. However, no specific methodology for the photography, baseline views and visualisations has been identified.
1.3 Does the assessment state whether the effects are beneficial, adverse or neutral?	NOT ALWAYS	This is one of the criteria used to judge the description of effects (ref LVIA 6.4.14). However, it has not been applied consistently, and this review has therefore made the worst-case assumption that impacts are potentially adverse unless stated otherwise.
1.4 Does the assessment distinguish between the effects of construction and the completed development?	YES	Ref LVIA sections 6.7/6.8
1.5 Where a potential for adverse effects has been identified, has mitigation been proposed?	YES	Mitigation has been considered at the site planning stage, including consideration of influences such as finished floor levels, location of buildings/infrastructure, massing and appearance.
1.6 Has the effectiveness of this mitigation been assessed?	YES	Effects are assessed for the Year 1 and Year 10 scenarios, allowing for the growth of landscaping identified in Figs 6.8/6.9: Landscape Strategy Plans.
2. Presentation		
2.1 Is the LVIA clearly structured and presented?	YES	Although, as is often the case with an ES, it is not always easy to locate the relevant references and material.
2.2 Is it generally adequately supported by:		
- Maps/plans?	YES	
- ZTV?	PARTLY	Ref LVIA Fig. 6.6 – but ref Appendix A for MSevision comments on the reliability of the methodology
- Photos?	PARTLY	Ref LVIA Appendix 6.2: Photographic Record and

		Visualisations – but ref Appendix A for MSevision comments on the degree to which these comply with best practice
- Visualizations?	PARTLY	Ref LVIA Appendix 6.2 – but ref Appendix A for MSevision comments on compliance with best practice. 11 VPs have been selected for visualisations (photomontages), amounting to 30% of the representative views. Whilst this is regarded as a generous proportion, only 6 of these views (16% of the total) are located sufficiently close to the developed site to be capable of giving rise to a materially significant degree of impact.

3. Landscape Character		
3.1 Has reference been made to published LCAs at the appropriate levels?	YES	Ref LVIA Table 6.06
3.2 Have the character of the site and its immediate context been adequately described?	YES	LVIA Section 6.5
3.3 Has the site's representativeness of the published character types/areas been assessed?	YES	Ref LVIA Table 6.07: Representativeness
3.4 Has a more site-specific character assessment been carried out	YES	Ref LVIA 6.5.25 onwards
3.5 Have relevant designations been identified?	YES	Ref Designations Plan, LVIA Figure 6.3
3.6 Have the relevant physical landscape receptors within the site been assessed?	YES	
3.7 Have the relevant perceptual attributes within the site been assessed?	YES	Ref LVIA Table 6.07: Perceptual aspects, although insufficient weight has been given to openness and rurality.
3.8 Has landscape sensitivity been assessed on the basis of its susceptibility and value?	YES	Ref LVIA 6.5.39. However, the attribution and consistency of these factors, particularly in relation to value, has been queried.
3.9 Has the LVIA considered whether the site may form part of a valued landscape?	YES	Ref LVIA Table 6.07 – however, this Box5.1 analysis has been superseded by LI TGN 02/21 and the analysis in this review suggests that landscape value has been under-stated.
3.10 Has the potential for cumulative effects in combination with other developments been assessed?	YES	Ref LVIA 6.13

4. Visual Impact		
4.1 Has a ZTV been produced?	YES	Ref LVIA Fig 6.6 – but see MSenvision comments in Appendix A.
4.2 Were the assessment views agreed with the LPA?	NOT KNOWN	Ref LVIA 6.5.40 – not stated explicitly.
4.3 Have modelled visualizations been prepared?	YES	Ref LVIA Fig 6.10
4.4 Are these views sufficiently representative?	TBC	Whilst the number of views appears to be reasonable, the scarcity of views representative of residential receptors is noted.
4.5 Have seasonal influences been taken into account?	PARTLY	Summer and winter versions of the views have not been explicitly assessed.
4.6 Can the visualizations be relied upon?	NO	Ref Appendix A for MSenvision comments on accuracy
4.7 Have all potential receptors been identified?	TBC	See previous query re residential receptors
4.8 Has the sensitivity of receptors been properly assessed?	YES	

5. Policy Considerations		
5.1 Does the LVA set out the landscape policy context?	YES	LVIA Section 6.2
5.2 Does the LVA comment on the degree to which the proposed development complies/conflicts with relevant policy?	NO	But policy compliance is not a formal part of LVIA as per GLVIA3, and is often left to the Planning Statement.

4. Implications for Assessment: Technical Matters

4.1 **Appendix A** comprises a technical review by MSevision of the visual material supporting the LVIA. The matters it raises may be summarised as follows:

1. Technical methodology appears to be absent.
2. Poor choice of camera equipment.
3. Whilst the montages are based on winter (January) photography, it is good practice to complement this with summer versions, but these are absent.
4. Blurring (e.g. on VP10) suggests that the camera was hand-held; if so, this by definition introduces potential inaccuracies into the matching of a 3D model.
5. The montages for VPs 24, 26 and 27 are unclear, and should have been presented as accurate visual representations (AVR1s).
6. Poor understanding of presentation size – a 68 degree image on an A3 sheet at 330mm viewing distance does not meet any recognized guidance.
7. None of the close-range views show the full extents of the development, even though this is fundamental requirement of TGN06/19, and the visualizations may therefore understate the impact of the development.
8. The images presented are “visualizations” rather than AVRs, and do not meet any recognized presentation standard.
9. The survey work is poor and is likely to include major inaccuracies.
10. The origin of the 3D model is not explained, and its accuracy therefore cannot be verified.

4.2 As a result, the ZTV, photography, annotated photos and montages cannot necessarily be relied upon for assessment purposes. On the basis of the information presented in the LVIA, the images presented in the photomontages are of unknown accuracy and may be little more than “artist’s impressions”.

4.3 The conclusions drawn in the LVIA on the basis of this information are likely to be similarly of limited reliability, unless/until it has been verified by the submission of further information that responds to the points raised in the technical review.

5. Implications for Assessment: Matters of Judgment

- 5.1 The LVIA emphasizes the importance of “reasoned professional judgment” in identifying the significance of effect (ref 6.4.27). This approach, together with compliance with accepted best practice, applies throughout the assessment process. Compliance with best practice in relation to the visual material has been addressed in Section 5 and Appendix A.
- 5.2 This section considers matters of judgment raised by the compliance checklist in Section 3. These can be summarised as follows and are discussed below:
- Significance Threshold
 - Landscape Value and Sensitivity
 - Effectiveness of Mitigation
 - Character Impact on Views
 - Night-Time and Other Perceptual Impacts
 - Benefits of the Country Park

Significance Threshold

- 5.3 The LVIA defines significant effects as those “greater than Moderate” (LVIA Table 6.05), i.e. Major or Major/Moderate. This is the key definition underpinning an EIA, which is required to identify the “likely significant effects”.
- 5.4 There is therefore by definition a likelihood that only a minority (at most 25%) of the effects have the potential to be significant. Whilst this is common in EIA practice, the implication of this approach is that the test of significance becomes a relatively “high bar” to exceed.
- 5.5 In addition, the Non-Technical Summary (NTS) points out that the significance threshold for all the other 10 EIA topics includes Moderate and Major effects (NTS 1.7). I have found no explanation as to why a more onerous test for significance has been adopted for landscape/views.
- 5.6 My experience on other EIAs has been that, whilst major landscape/visual effects are definitely considered to be significant, and minor effects are definitely not significant, the significance of moderate effects often depends on particular circumstances (e.g. where a substantial number of receptors may experience moderate effects from a group of dwellings or section of PRoW). That is not the case with this LVIA, which explicitly excludes moderate effects.
- 5.7 The LVIA Summary and Residual Effects (ES Appendix 18.2) confirms that none of the effects on landscape character, the setting of heritage assets or residential receptors are considered to be significant. Significance is confined to visual effects, which the LVIA reports as significant for 9 (24%) of the viewpoints at Year 1,

reducing to only two viewpoints (5%) by Year 10. This paucity of significant landscape effects needs to be understood in the context of the limitations and value-judgments underpinning the LVIA process (e.g. the probability that landscape sensitivity has been under-stated, and the possibility that residential receptors may have been under-assessed).

Landscape Value and Sensitivity

- 5.8 Assumptions about landscape value and sensitivity have been addressed in **Section 2**. These relate to the reduced value of the developed half of the site in comparison to the part proposed to accommodate the country park, and its proximity to the GUC Conservation Area and the Tove Valley SLA, both of which should have been regarded as indicators of potentially enhanced value (and thereby sensitivity).
- 5.9 My walkover survey has been sufficient to question whether the contrast in sensitivity between the developed/undeveloped parts of the site is as clear-cut as the LVIA suggests. This point is important because of:
- the assumption in the LVIA that the developed parts of the site are the least sensitive;
 - the emphasis which the LVIA places on the benefits that it argues would be provided by the country park; and
 - the degree to which these benefits are considered in the LVIA to offset the harmful impact of the development.
- 5.10 Because of the relationship between these stages in the assessment process, any unreasonableness or bias are likely have been amplified, so as to understate the severity of harm and the significance of effects.

Effectiveness of Mitigation

- 5.11 The LVIA suggests that a substantial proportion of the viewpoints (43%) are predicted to experience reductions in the Y1 effects by Y10, as landscaping becomes established and provides mitigation. This mitigation is predicted in the LVIA to be sufficient for the effects on all but two of the nine viewpoints considered to give rise to significant effects at Y1 to be no longer significant by Y10. This reduction (of 95%) suggests that the mitigation achieved by landscaping would be unrealistically effective.
- 5.12 I have carried out my own assessment of the mitigating effect on the 11 views for which photomontages have been prepared, as shown in the LVIA. The overwhelming majority (9) of the views would experience material changes to their character or openness at Year 1.

- 5.13 These changes generally reflect the introduction of built development, sometimes to the extent of obstructing the field of view (VPs 11/12b). More usually the changes result from the massing of the buildings being inserted into the middle-ground or background of the view, creating a built skyline where there is currently none. In several cases, the prominence of these buildings is exaggerated by visible gable-ends.
- 5.14 In very close-range views (11/12b), the screening achieved by landscaping is shown to be sufficient to virtually or wholly obstruct views of the buildings. In most cases, however, the landscaping is shown as increasing the height and density of existing vegetation screening the facades of the buildings, rather than as materially reducing the prominence of the massing itself and the built skyline it creates.
- 5.15 This is shown below in **Figure 5.1** in relation to the Year 1 and Year 10 versions of Viewpoint 10. Taking account of the unverified accuracy of the photomontages, it is therefore legitimate to question whether the proposed mitigation achieved by Y10 would be as effective as the LVIA suggests.
- 5.16 If it is not, the fundamental basis of the landscaping scheme – and thereby the reliability of the “residual” (i.e. post-mitigation) effects – should similarly be questioned. For example, whether the correct species mix/density or extent of planting has been used, or whether a Y15 scenario (as has long been the case in LVIA) would provide a more robust basis for assessment.

Figure 5.1: Existing, Y1 and Y10 Versions of Viewpoint 10



Existing View

Character Impact on Assessment Views

- 5.17 A related matter is the nature of the impact on the modelled views. In the majority of cases, the existing baseline views retain a largely rural character defined by greenfield uses and a sense of openness. Built development is rarely a feature, and is dominant in only one view (VP10 – the A5 roundabout, see above). Emmett’s warehouse, which is locally prominent, can be glimpsed from several locations, but is conspicuous in only one view (VP12b).



Y1 View (initial mitigation)



Y10 View (established mitigation)

- 5.18 Whilst the LVIA makes repeated references to existing urban influences, these are generally not apparent in the assessment views. This again highlights the judgmental aspects of the LVIA, and the likelihood that the influence of such urbanising features has been overplayed. Passing through the local area on PRoWs such as the Milton Keynes Boundary Walk and the GUC Towpath, it is striking how rapidly one can move away from sources of visual and acoustic impact such as the A5, and into the relative greenery and tranquillity of the Great Ouse floodplain and canal corridor.
- 5.19 The categorisation of the adjoining section of the Great Ouse Valley as an Urban River Valley (ref **Figure 2.1**) should not be misunderstood. It is urban because of its proximity to built-up areas and sources of visual and acoustic impact such as the A5, i.e. because of its setting – not because of its intrinsic character.
- 5.20 The floodplain and undeveloped valley slopes comprise a combination of farmland, public access land and nature reserve (restored gravel pits) that retain a largely greenfield and countryside character. This “Urban River Valley” has generally not been urbanised – with the notable exception of the A5 corridor.
- 5.21 The residual countryside character of the valley is all the more valued for the recreational opportunities and visual amenity it provides. It is categorised as “urban” only because that is how it is identified in the Milton Keynes LCA – not because that is its character.

- 5.22 The most obvious impact of the proposed development on most of the views, as shown on the photomontages, is to introduce built development into views where it is currently either absent or inconspicuous. Where glimpses of built development are obtained, such as Wolverton Mill, Cosgrove Church or the architecture of the GUC, their scale and appearance are sympathetic to their setting.
- 5.23 By contrast, the buildings to be introduced by the proposed development reflect their purpose for logistics use, and are scaled accordingly. This is apparent in their footprint and height, both of which are excessive in comparison to non-logistics employment use.
- 5.24 The ZTV plan (LVIA Figure 6.6) states that the ZTV is based on "maximum development parameters of 18.9m, 15.9m and 13.9m above existing ground level". These parameters exceed the c9m for existing settlements/buildings, and the c12m for existing woodland and tree belts, that have been assumed for modelling purposes in the ZTV.
- 5.25 By way of comparison, the tallest proposed building (Building One) is equivalent to a six-storey (residential) building, of which there are no examples in the local area. The proposed buildings are therefore materially taller - and their footprints often materially larger - than most of the existing built form in the local area. They are also taller than the tree cover on which the area relies to screen intrusive development, particularly along the otherwise open parts of the Ouse valley.

Night-Time and Other Perceptual Impacts

- 5.26 In the absence of any operational constraints, the logistics uses are assumed to operate on an overnight or 24/7 basis. This is likely to require high-intensity lighting for safety/security purposes around service yards, parking areas and external storage areas. No explicit details of lighting have been provided in the LVIA, and no explicit assessment of its visual impact (which might reasonably have included at least a couple of night-time photos) has been carried out.
- 5.27 Most of the Great Ouse floodplain and GUC provide dark corridors that contribute to the tranquillity and "rural feel" of the area away from major roads and built-up areas. This development would amount to a significant extension of the built-up area, with the associated lighting contributing both to skyglow and the introduction of visible light sources onto what is currently a dark site.
- 5.28 The impact of lighting has not been properly assessed in the LVIA, in terms for example of a plan showing light-spill or night-time versions of the ZTV or selected views.

Benefit of the Country Park

- 5.29 The LVIA refers repeatedly to the positive influence of the country park, which is envisaged to be a "significant benefit" (LVIA 6.4.9). Where the country park

influences the assessment views, the LVIA has taken this into account in providing mitigation for the otherwise adverse effects of the built development.

- 5.30 This benefit, however, does not translate into a significant beneficial effect that is reported as such in the LVIA. Of the montage views, only one (VP3b) is located within the country park, whilst a second (VP6a) shows part of the country park occupying the fore/middle ground of the view. The predicted impact on View 3b is shown in **Figure 5.2** below.

Figure 5.2: Existing and Y1/Y10 Versions of Viewpoint 3b



Existing View



Year 1 View (initial mitigation)



Year 10 View (established mitigation)

- 5.31 The obvious impact of the development at Year 1 is to introduce warehouse buildings as a built horizon across just over half of the view, competing with and

partially screening the existing tree-line. By Year 10, growth of vegetation within the country park creates a more varied middle-ground to the view.

- 5.32 However, this vegetation contributes relatively little to screening, most of which appears to be provided by additional tree cover along the Old Stratford Arm or within the developed part of the site. The country park therefore makes little direct contribution by way of helping to screen the development, including probable night-time impacts on views from locations such as (listed) Wolverton Mill.
- 5.33 The country park itself creates a more ornamental appearance, broadly reminiscent of an urban park. Its benefits to landscape character and views are not immediately obvious, since the country park reinforces the urban impact of the development, does little to mitigate it, and reduces the openness that is currently a positive attribute of the floodplain.
- 5.34 As a result, the LVIA has overstated the potential landscape and visual benefits of the country park, in its efforts to justify the adverse impact of the development.

6. Summary and Conclusion

- 6.1 This review has confirmed that, whilst the LVIA is broadly consistent with the guidance set out in GLVIA3, a range of concerns have been raised, as summarised below.
- 6.2 The visual material (ZTV, photography and montages) is unreliable, and as it stands is not considered to provide a sound basis for the findings of the assessment or for determination of the application. The LPA should request further information from the applicant by way of response.
- 6.3 The threshold of significance applied to landscape/visual effects is inconsistent with all other EIA topics. The LPA should seek explanation from the applicant, together with a sensitivity test of the implications if a different threshold were to be applied.
- 6.4 The LPA should seek further justification for the assessment of the landscape sensitivity of the site, specifically in relation to its relationship to the GUC Conservation area and the Tove Valley SLA, and the potential for the central and eastern parts of the site to be regarded as a “valued landscape”.
- 6.5 The LPA should seek further justification for the LVIA’s reference to a “fallback position” of allocated employment development, its relationship to baseline conditions, and any implications this may have had for the judgments underpinning the LVIA.
- 6.6 The effectiveness of the mitigation reported in the LVIA has been questioned. This mitigation depends mainly on the ability of vegetation within the country park and developed site to screen views of the proposed buildings. Scrutiny of the photomontages indicates that the harmful impacts of their scale and the introduction of a built horizon are unlikely to be mitigated adequately, and that this mitigation has been over-reported in the LVIA.
- 6.7 The photomontages supporting the LVIA show that the nature of the development’s impact on the assessment views stems primarily from the scale of the proposed buildings in terms of both their height and footprint, which materially exceeds that of the existing pattern of built development in the area.
- 6.8 Night-time effects due to lighting are likely to be significant, but have not been properly assessed in the LVIA.
- 6.9 It is noted that the country park is not reported in the LVIA to give rise to a significantly beneficial effect – even though it is stated elsewhere as amounting to a significant benefit. The assumed landscape/visual benefits of the country park are not supported by the evidence in the assessment.

- 6.10 WNC should not take the conclusions of the LVIA at face value. In particular, they should note that the technical material on which the LVIA is based is considered to be unreliable.
- 6.11 This review has also questioned judgmental aspects of the LVIA such as the definition of significance, the value/sensitivity of the application site and the effectiveness of the proposed mitigation. Overall, the LVIA as it stands is not considered to provide a sound basis for determination of the application.
- 6.12 In addition, the development is not considered to meet several of the relevant policy tests within the South Northamptonshire Part 2 Local Plan 2011-2029, as set out in the Executive Summary of this document.

APPENDIX A

Technical Review of Visual Material by MSenvision

Furtho Pit Development

Technical Review Undertaken by

Michael Spence BA(Hons), MLD, CMLI, REIA,
FRGS

for Peter Radmall Associates

Introduction

Mike Spence is founder of MSEnvision Ltd, an independent company providing confidence in ZTV, photography and visualisation work. Mike is a Chartered Landscape Architect, Registered EIA Practitioner and Fellow of the Royal Geographical Society, with over 34 years professional experience. Mike was one of the technical authors behind the Landscape Institute's TGN06/19 and worked for SNH (now NatureScot) on their windfarm visualisation guidance in 2015, and most recently in 2023. He worked closely with the LI between 2013 and 2019 providing training and technical guidance. Since 2019, Mike has been a member of IEMA's Technical Steering Committee, the LI Technical Committee and produced a Technical Guidance Note on ZTVs for the LI. He was also the lead technical author for the Landscape Institute's Technical Competency areas for Digital Technologies and Photography/Visualisations.

Mike and his team at MSEnvision have produced photography, surveying, GIS support and 3D modelling for many projects since 2000. In recent years the team has worked on many large-scale development projects across the UK.

Mike has also given evidence at many Public Inquiries and Planning Appeal.

His background includes working alongside SNH(NatureScot), National Trust, Historic Royal Palaces, Friends of the Earth, Historic England, English Heritage, the Environment Agency, many local authorities, and many developers. He works internationally and is a highly respected technical authority on technical photography and visualisations.

Documents Reviewed

Figures produced by Aspect Landscape Planning (Aspect LP) dated January 2022.

Photomontage Location Plan

Aspect LP has generally followed good practice in presenting the viewpoint and photomontages on an aerial image. However, it is clear from all viewpoints that almost every viewpoint image fails to capture the full site extents. This is a fundamental requirement of photography accompanying such major development, and a specific requirement of the Landscape Institute's TGN 06/19 Visualisation of Development Proposals (para 2.2).

ZTVs

When it comes to ZTV calculation good practice always includes a bare earth ZTV, alongside a Visual Buffers ZTV. Aspect LP have presented just a visual buffers ZTV. The ZTV does not explain eye height used for the calculations. Landform OS contour data is an unusual height data set to use. LIDAR DTM is freely available and much more accurate than the older height data sets.

It is not clear why viewpoints have been selected outside of the ZTV (VPs 22, 23, 32 & 35) as, theoretically, they will not experience any visibility. There are plenty of other viewpoint locations with theoretical visibility that should have been used instead. More technical explanation is required.

Photomontages

The camera equipment generally looks suspect. Aspect LP have used a Cropped Frame Sensor camera (Nikon D3200) with a fixed 50mm lens. The cropped sensor would convert the 50mm lens to effectively a 75mm lens. This could potentially create geometry issues for the 3D modeling and rendering.

A review of the camera locations suggests that the locations of the cameras haven't been accurately surveyed. Viewpoint 10 appears to be within 20metres of the coordinates given. Viewpoint 10 is identified at 478762, 242056. However, a review of Google StreetView and OS Mastermap data suggests this should be nearer to 478740, 242047. The camera height appears to be somewhat incorrect. According to the LIDAR DTM at this location, the ground level is 83.279m AOD. A camera set 1.6m above that point gives a height of 84.8791m. Aspect LP specify a ground height of 85m and a

camera height of 1.6m. Giving a camera location of 86.6m AOD - almost a 2m difference.

These illustrate that the photography has not been surveyed. As a result, there will therefore be inaccuracies built into both the 3D modelling and the visualisations.

One important omission is that there are no 3D model infrastructure wirelines presented. These would illustrate the full extent of the development in the view, and demonstrate how the 3D model views match the photograph panoramas. This is an obvious requirement of viewpoint photography and visualisations (refer to LI TGN06/19 para 2.2). The whole site must be presented in the view, across a series of 90 degree A1 sheets. None of the viewpoints captures the whole of the development and is considered an important omission in the work.

Another important issue is the sharpness of the photography. Viewpoint 10, for example, has blurry trees. This suggests that it is likely that the photographs were taken hand-held, and not from a levelled tripod. Without a levelled tripod it is impossible to match the 3D model renders to the photography.

The size at which the images are presented fails to conform with any guidance. They are presented simply too small. LI TGN 06/19 is specific about the size images should be presented: 90 degrees on A1 wide sheet. This is the equivalent of 45 degrees on an A3 sheet.

There is no evidence that a full 3D model has been constructed for the whole development.

The landscape masterplan illustrated in Figure 6.9 does not appear to have been included in the 3D model. All visualisations appear to be simple 'artist's impressions', poorly executed since the photography is taken in January and the presence of wildflowers in the visuals are more suggestive of conditions in April/June.

Viewpoint 3B

Existing View

This image presents a 68 degree winter view towards the northern extents of the site.

The larger elements of the development extend much further to the west than presented in this image. The image should have been presented as two or three wide 90 degree images on A1 wide sheets.

One of the fundamental requirements of the Landscape Institute's TGN06/19 Visualisation of Development Proposals is that the full development is presented. As

only a small portion of the proposed development has been presented in this image the visualisation fails this basic test.

Year 1 Proposed

This image presents a 68 degree view towards the northern extent of the site. No 3D model view is presented to demonstrate how the visualization is matched to the photograph.

The most obvious concern is that this view presents a very small proportion of the development in the view. Where is the view towards the main buildings to the west?

The landscaping is poor. This is a winter photograph and the year 1 landscaping suggests wild flower grassland in the foreground. In January there would be no flowering grassland. There is no tree planting around the wetland areas according to the landscape masterplan, just 'native scrub'.

Year 10 Proposed

This image presents a 68 degree view towards the northern extent of the site. No 3D model view is presented to demonstrate how the visualization is matched to the photograph.

The most obvious concern is that this view presents a very small proportion of the development in the view. Where is the view towards the main buildings to the west?

The landscaping is poor. This is a winter photograph and the year 1 landscaping suggests wild flower grassland in the foreground. In January there would be no flowering grassland.

A number of trees have been included in the visualization. The visualizer has added leaves onto the trees which would not be present in the winter months. There is no tree planting around the wetland areas according to the landscape masterplan, just 'native scrub' so the large trees present wouldn't be expected to be in the visualization.

Viewpoint 3B

Existing View

This image presents a 68 degree winter view towards the site.

The larger elements of the development extend much further to the east than presented in this image. The image should have been presented as two or three 90 degree images on A1 wide sheets.

One of the fundamental requirements of the Landscape Institute's TGN06/19 Visualisation of Development Proposals is that the full development is presented. As only a small portion of the proposed development has been presented in this image, the visualisation fails this basic test.

Year 1 Proposed

This image presents a 68 degree view towards the site. No 3D model view is presented to demonstrate how the visualization is matched to the photograph.

The most obvious concern is that this view presents a very small proportion of the development in the view. Where is the view towards the closer buildings to the east?

The massing of the proposed development is unclear, lost into the vegetation in the view

Year 10 Proposed

This image presents a 68 degree view towards the site. No 3D model view is presented to demonstrate how the visualization is matched to the photograph.

The most obvious concern is that this view presents a very small proportion of the development in the view. Where is the view towards the closer buildings to the east?

Viewpoint 10

Existing View

This image presents a 68 degree winter view towards the site.

The image includes extensive blur possibly caused by being taken as a hand-held photograph without the use of a levelled tripod.

Units 6-9 lie close to the viewpoint, but it is difficult to clearly understand which buildings these are. The image should have been presented as two 90 degree images on A1 wide sheets.

One of the fundamental requirements of the Landscape Institute's TGN06/19 Visualisation of Development Proposals is that the full development is presented. As only a small portion of the proposed development has been presented in this image the visualisation fails this basic test.

Year 1 Proposed

This image presents a 68 degree view towards the site. No 3D model view is presented to demonstrate how the visualization is matched to the photograph.

The most obvious concern is that this view presents a very small proportion of the development in the view. Which are the closer buildings to the east?

The massing of the proposed development is unclear, lost into the vegetation in the view

Year 10 Proposed

This image presents a 68 degree view towards the site. No 3D model view is presented to demonstrate how the visualization is matched to the photograph.

The most obvious concern is that this view presents a very small proportion of the development in the view. Where are the closer buildings to the east?

Viewpoint 11

Existing View

This image presents a 68 degree winter view towards the site.

Units 8 & 9 lie close to the viewpoint, none of the other units are captured in this view. Theoretically all of them will be visible. The image should have been presented as two 90 degree images on A1 wide sheets.

One of the fundamental requirements of the Landscape Institute's TGN06/19 Visualisation of Development Proposals is that the full development is presented. As only a small portion of the proposed development has been presented in this image the visualisation fails this basic test.

Year 1 Proposed

This image presents a 68 degree view towards the site. No 3D model view is presented to demonstrate how the visualization is matched to the photograph.

The most obvious concern is that this view presents a very small proportion of the development in the view. Where are the rest of the units to the west?

Trees with leaves are included on a winter visualization. This is very poor and unrepresentative.

The massing of the proposed development is unclear, lost within the vegetation in the view

Year 10 Proposed

This image presents a 68 degree view towards the site. No 3D model view is presented to demonstrate how the visualization is matched to the photograph.

Trees with leaves are included on a winter visualization. This is very poor and unrepresentative.

The most obvious concern is that this view presents a very small proportion of the development in the view. Where are the rest of the units to the west?

Viewpoint 12b

Existing View

This image presents a 68 degree winter view towards the site.

Units 5 & 6 lie close to the viewpoint, but only unit 5 is shown. None of the other units are captured in this view. Theoretically all of them will be visible. The image should have been presented as two 90 degree images on A1 wide sheets.

One of the fundamental requirements of the Landscape Institute's TGN06/19 Visualisation of Development Proposals is that the full development is presented. As only a small portion of the proposed development has been presented in this image the visualisation fails this basic test.

Year 1 Proposed

This image presents a 68 degree view towards the site. No 3D model view is presented to demonstrate how the visualization is matched to the photograph.

The most obvious concern is that this view presents a very small proportion of the development in the view. Where are the rest of the units to the west?

Trees with leaves are included on a winter visualization. This is very poor and unrepresentative.

The massing of the proposed development is unclear, lost within the vegetation in the view

Year 10 Proposed

This image presents a 68 degree view towards the site. No 3D model view is presented to demonstrate how the visualization is matched to the photograph.

Trees with leaves are included on a winter visualization. This is very poor and unrepresentative.

The most obvious concern is that this view presents a very small proportion of the development in the view. Where are the rest of the units?

Viewpoint 14

Existing View

This image presents a 68 degree winter view towards the site. The view is from directly north looking due south.

Only the most distant unit 5 is fully shown. None of the other units are captured in this view. Theoretically all units will be visible, particularly the large Unit 1. The image should have been presented as two 90 degree images on A1 wide sheets.

One of the fundamental requirements of the Landscape Institute's TGN06/19 Visualisation of Development Proposals is that the full development is presented. As only a small portion of the proposed development has been presented in this image the visualisation fails this basic test.

Year 1 Proposed

This image presents a 68 degree view towards the site. No 3D model view is presented to demonstrate how the visualization is matched to the photograph.

The most obvious concern is that this view presents a very small proportion of the development in the view. Where are the rest of the units to the west?

The massing of the proposed development is unclear, lost within the vegetation in the view

Year 10 Proposed

This image presents a 68 degree view towards the site. No 3D model view is presented to demonstrate how the visualization is matched to the photograph.

The most obvious concern is that this view presents a very small proportion of the development in the view. Where are the rest of the units to the west?

Viewpoint 18

Existing View

This image presents a 68 degree winter view towards the site. The view is from the roundabout to the west, and the viewpoint plan suggests the whole site is captured.

However, only part of Unit 1 is captured in the view. None of the other units are captured in this view. Theoretically the full site will be visible, with the large Unit 1 centred. The image should have been presented as one 90 degree image on an A1 wide sheet, centred on Unit 1.

One of the fundamental requirements of the Landscape Institute's TGN06/19 Visualisation of Development Proposals is that the full development is presented. As only a portion of the proposed development has been presented in this image the visualisation fails this basic test.

Year 1 Proposed

This image presents a 68 degree view towards the site. No 3D model view is presented to demonstrate how the visualization is matched to the photograph.

The most obvious concern is that this view presents a very small proportion of the development in the view. Where is the rest of Unit 1 and the units to the north-east?

Year 10 Proposed

This image presents a 68 degree view towards the site. No 3D model view is presented to demonstrate how the visualization is matched to the photograph.

The most obvious concern is that this view presents a very small proportion of the development in the view. Where is the rest of Unit 1 and the units to the north-east?

Viewpoint 20

Existing View

This image presents a 68 degree winter view towards the site. The view is from a footpath to the west.

However, only Unit 1 is captured in the view. None of the other units are captured in this view. Theoretically Unit 2 will be visible. The image should have been presented as one 90 degree image on an A1 wide sheet, centred on Unit 1.

Year 1 Proposed

This image presents a 68 degree view towards the site. No 3D model view is presented to demonstrate how the visualization is matched to the photograph.

The most obvious concern is that this view presents a very small proportion of the development in the view. Where is Unit 2?

Year 10 Proposed

This image presents a 68 degree view towards the site. No 3D model view is presented to demonstrate how the visualization is matched to the photograph.

The most obvious concern is that this view presents a very small proportion of the development in the view. Where is Unit 2?

Viewpoints 24. 26 & 27

Existing View

These image presents a 68 degree winter view towards the site. The views are from footpaths to the east.

However, the proposed development location is unclear in each of these views. The 'site extents' should be shown, and an AVR1 rather than a photomontage. The image should have been presented as one 90 degree images on an A1 wide sheet, centred on Unit 1.

Year 1 & 10 Proposed

These image each present a 68 degree view towards the site. No 3D model view is presented to demonstrate how the visualization is matched to the photograph.

The most obvious concern is that it is unclear where the site actually is? A site extents label and an AVR1 would be more appropriate.

Technical Methodology by Aspect LP

No Technical Methodology could be found explaining the approach to the ZTV, photography or visualisations by Aspect LP.

Summary and Recommendations

The ZTV is poor and should be re-run with clearer explanation.

The camera equipment is poor. A cropped frame sensor camera combined with a 50mm lens will give the equivalent of a 75mm lens. The Nikon D3200 is an entry-level camera and over 12 years old

The photography has been captured in January, i.e. representative of winter conditions. It is good practice to also provide comparative summer photography (June to September). Viewpoint 10 has a large amount of blur present which suggests the

photography was hand held. A 3D model render cannot be matched accurately to a hand-held photograph.

The photomontages for viewpoints 24, 26 and 27 are unclear. These should have been presented as AVR1s.

Aspect LP demonstrate poor understanding in terms of presentation size. A 68 degree image on an A3 sheet at 330mm viewing distance fails to meet any recognized presentation guidance. Additionally, a fundamental requirement of LI TGN 06/19 is that the full development is presented. All close viewpoints fail to capture the full extents of the development.

A further concern is that it is not clear whether the full development has been included in the 3D model.

The images as presented are not accurate visual representations. There is no inherent accuracy in the modelling. The images as presented are simply 'visualisations'. These visualisations have no credibility, amount to little more than 'artists impressions', and do not meet any recognized presentation standards.

The survey work carried out by Aspect LP appears poor, and is likely to include major inaccuracies, with the result that there will be inconsistencies between the photography and the 3D model renders.

It is unclear who has built the 3D model, since this is not explained anywhere, including what ground levels and building heights have been used.

In summary, in my opinion there are too many issues with the photography, 3D modelling and visualisations to be able to consider them to provide a reliable understanding of the impacts of the proposed development on the viewpoints and landscape. The images presented are simple 'visualisations', with an unknown degree of accuracy. Without further information and clarifications, they cannot be relied upon, as explained above. They therefore cannot be assumed to provide a sound basis for assessment purposes.

It is recommended that the photography is recaptured in summer conditions, that a complete 3D model is constructed with all elements present, and that wirelines are produced to demonstrate the visibility of all elements from each viewpoint. The full visibility of the development from each viewpoint should be presented, to include both winter and summer views.

Mike Spence 21 June 2025, edited by Peter Radmall 5th October and 16th October 2025