Speyside Business Alliance

Dorenell Windfarm

Mark Steele

Landscape and Visual Topic Paper

Environmental Statement Methodology Critique

Mark Steele Consultants

October 2010

1.0 Introduction

1.1 Critique Scope

1.1.1 This critique relates to methodology used in the Dorenell Windfarm Environmental Statement (ES), prepared by Horner + Mclennan in May 2008. It excludes the sections of the ES relating to design (which are addressed in the MSC Design Hearing Statement) as well as the aspects of cumulative impact covered in the MSC critique of the Supplementary Environmental Information (SEI) – Core Document CD-K 23.

1.1.2 The critique will focus on the methodology used as a framework for the professional judgements made in the assessment of landscape and visual impact significance.

2.0 Methodology

2.1 Landscape and Visual Impact Assessment (LVIA) Methodology

2.1.1 Experience gained from undertaking critiques of a number of windfarm ESs has identified inconsistencies in the methodologies used for Landscape and Visual Impact Assessment (LVIA). There are variables within methodologies that have a direct influence on the assessment of significance of effects and consequential acceptability of the development in planning policy terms. Therefore this critique will focus on the following:

- the selection of viewpoints;
- the assessment of receptor sensitivity;
- the assessment of magnitude of effect;
- the nature of the effect; and
- the significance of effects.

2.2 Viewpoint selection

2.2.1 Whilst the *Guidelines for landscape and Visual Impact Assessment* (GLVIA) published by the Landscape Institute is the principal reference for LVIA methodology there are a number of Scottish Natural Heritage (SNH) publications that expand upon particular aspects of windfarm LVIA methodology (listed in ES Table 9.1). *Visual Representation of Windfarms – Good Practice Guidance* (VRW) is the main reference for guidance on the selection of viewpoints.

VRW paragraph 88 states that '*The term viewpoint is used within Visual Impact Assessment (VIA) to define a place from where a view is gained and represents specific conditions or viewers (visual receptors). During the VIA process for a proposed windfarm, a number of viewpoints are chosen in order to assess:*

- *the existing visual resource;*
- *the sensitivity of this resource to windfarm development;*
- *the proposed design (incorporating mitigation measures to minimise any adverse impacts); and*
- *the predicted appearance of the final proposed development.'*

2.2.3 VRW paragraph 93 states that '*Viewpoints are initially selected as being those places from where a proposed development is likely to be visible and would result in significant effects on the view and the people who see it (receptors). This is informed by the ZTV and other maps, fieldwork observations, and information on other relevant issues such as access, landscape character and popular vantage points.'*

ES paragraph 9.10 states that '*Viewpoints that would represent the range of views of the proposed wind farm, and which could be used to carry out viewpoint assessment as part of the Visual Impact Assessment (VIA), were first identified from the ZTVs. These viewpoints are located within publicly accessible areas along roads, within settlements and in areas popular for outdoor recreation...*'

However, the ES viewpoints fail to represent users of footpaths promoted through the Moray Core Paths Finalised Plan (Appendix Document Figure 1), that was a consultative draft plan when the ES was prepared. In particular accessible elevated vantage points such as The Scalp (Appendix Document Figure 3 Panorama 4) as well as footpaths in closer proximity (including some that pass through the development site) are not represented by viewpoints. The ES Zone of Theoretical Visibility (ZTV) maps clearly demonstrate that the users of these paths are likely to be subject to significant effects.

2.2.4 VRW paragraph 90 states that '*The viewpoints used for VIA must be carefully selected to be representative of the range of views and viewer types that will experience the proposed development. They should also form part of the "description of aspects of the environment likely to be significantly affected by the development" (PAN58, paragraph 65).*'

Therefore, viewpoints should not just represent potential receptors of significant visual effects they should also illustrate the nature of the landscape that will be subject to significant landscape effects. The ES fails to properly represent the landscape and visual receptors most directly affected by the development.

2.2.5 The range of issues that influence the selection of viewpoints is listed in VRW Table 7 and recommends that '*Various distances from the proposed development* should be represented'. Furthermore, VRW paragraph 100 states that '*Viewpoints within the local area immediately surrounding the windfarm are particularly useful to understand and develop the windfarm layout and design.*'

The following distances are represented by ES viewpoints:
Over 30km – 2 viewpoints;
20 to 30km – 4 viewpoints;
10 to 20km – 6 viewpoints;
5 to 10km – 6 viewpoints; and
Under 5km – 1 viewpoint.

The sole representation of the visual and landscape resource within 5km is Viewpoint 3 located on the A941 between Dufftown and Cabrach at 3.6km from the nearest proposed turbine. Whilst this viewpoint represents potential significant effects on users of the A941 it is not representative of effects on recreational users or the characteristics of the landscape in the vicinity of the site. Whilst the viewpoint is located in the Black Water valley it is not fully representative of the landscape characteristics of the valley. Furthermore, Glen Fiddick is not visible in the view. The site works (apart from some of the turbines) are screened by topography.

2.2.6 It is not sufficient to argue that the viewpoints were initially agreed with consultees (such as Moray Council and SNH) as VRW paragraph 97 states that '*The issues discussed above regarding the selection of viewpoints*

highlight that a flexible approach needs to be adopted. This also reflects the iterative nature of VIA and the way in which parties will gradually become more familiar with a site and proposed development. Consequently, the developer must be aware that additional or alternative viewpoints may need to be considered throughout the VIA process if more information is required by either the landscape architect or experienced specialist assessor, or the determining authority and consultees.'

Therefore, it is incumbent upon the assessor to introduce further viewpoints when it becomes apparent that the ES viewpoints are not properly representative.

2.2.7 The ES viewpoint selection is inadequate for the purposes of undertaking a proper assessment of the significance of landscape and visual effects. Furthermore, it is inexplicable as to why Horner + Maclennan did not follow VRW guidance, particulary as they were co-authors of the SNH guidance.

2.3 Landscape Receptor Sensitivity

2.3.1 ES paragraph 9.18 defines landscape resource as *'The combination and distribution of physical components that contribute to landscape context and character and how this is experienced and valued.'*

This is broadly similar to the GLVIA paragraph 2.14 definition which states that *'Landscape effects derive from changes in the physical landscape, which may give rise to changes in its character and how this is experienced. This may in turn affect the perceived value ascribed to the landscape'* as well as the GLVIA glossary definition *'The combination of elements that contribute to landscape context, character and value'*.

The GLVIA glossary defines a landscape receptor as a '*Physical landscape resource...*' that will '*...experience an effect.*'

2.3.2 ES paragraph 9.22 states that '*The sensitivity of the landscape resource to changes associated with a proposed development can be defined as high, medium or low based on professional judgement of a combination of parameters, as follows:*

- *Landscape character – scale, enclosure, openness, land cover, texture and form;*
- *Landscape value – local, regional or national landscape statutory designations and non-statuory designated areas of recognised value;*
- *Distribution of receptors; and*
- *Scope for mitigation.*'

GLVIA paragraph 2.27 states '*The sensitivity of the landscape to change is reflected in the degree to which a landscape is able to accommodate change (due to a particular development or land use change) without adverse effects on its character.*'

This point is reinforced in GLVIA paragraph 2.28 which states that:
'*Landscapes vary in their capacity to accommodate different forms of development. Sensitivity is thus not absolute but is likely to vary according to the existing landscape, the nature of the proposed development and the type of change being considered. Sensitivity is not therefore part of the landscape baseline, but is considered during the assessment of effects.*'

The GLVIA glossary defines landscape sensitivity as *'The extent to which a landscape can accept change of a particular type and scale without unacceptable adverse effects on its character.'*

This is expanded upon in paragraph 7.16 of the GLVIA which states that: *'The degree to which a particular landscape type or area can accommodate change arising from a particular development, without detrimental effects on its character, will vary with:*

- *existing landuse;*
- *the pattern and scale of the landscape;*
- *visual enclosure / openness of views, and distribution of visual receptors;*
- *the scope for mitigation, which would be in character with the existing landscape;*
- *the value placed on the landscape.'*

Whilst broadly similar there is a greater emphasis in the GLVIA on the visual characteristics of the landscape resource and the distribution of '*visual receptors*'. This reinforces the need for viewpoints that are representative of the landscape resource most directly affected by the development – a significant omission in the ES.

The GLVIA also qualifies the '*scope for mitigation'* with '*which would be in character with the existing landscape.'* This is of particular relevance to the proposed development.

2.3.3 ES Table 9.2 sets out the ES definitions of high, medium and low landscape sensitivity.

High Landscape Sensitivity

'Key characteristics and features that are very sensitive to the location of a wind farm, such as simple or indistinct pattern, few existing foci, sense of intimacy and shelter and sense of wildness or wild land, and these contribute significantly to the distinctiveness of the landscape character type.

The distinctive charactersitics of the landscape are widely experienced and contribute significantly to the value of the landscape at a local, regional and national level.

Designated landscapes e.g. National Scenic Area (NSA) and those identified as having possible landscape value, for example within SNH Search Areas for Wild Land (SAWL).'

Medium Landscape Sensitivity

'Key characteristics and features that are sensitive to the location of a wind farm, but with which the wind farm may also integrate, such as a landscape with a distinct pattern, with occassional prominent foci, large scale structures, a sense of exposure and a landform to which wind farms could fit.

A landscape where the wind farm would not affect the key characteristics that contributes to the distinctiveness and/or value of the landscape.

The distinctive characteristics of the landscape are only locally experienced and/or only contribute to the value of the landscape at a regional level.

Regional and locally valued landscapes, both designated such as Areas of Great Landscape Value (AGLV), and non designated landscapes.

Landscapes in which it is possible to site and design a wind farm to have minimal impacts within the landscape.'

Low Landscape Sensitivity

'A landscape where the wind farm would not affect the key characteristics that contributes to the distinctiveness and/or value of the landscape. Landscape characteristics and features that do not make a significant contribution to landscape character or distinctiveness locally, or which are untypical or uncharacteristic of the landscape type.

Areas where a wind farm would fit the key characteristics of the existing landscape and/or where this can easily accommodate landscape change subject to careful design.

The distinctive characteristics of the landscape are only experienced locally.

Landscapes in which it is possible to site and design a wind farm to have minimal impacts within the landscape.'

2.3.4 The ES Table 9.2 definitions are predicated on the assumption that nationally designated landscapes are of high sensitivity, regional

designated landscapes are of medium sensitivity and (by implication) local designated landscapes are of low sensitivity. This is clearly counter intuative. An Area of Great Landscape Value (AGLV) is as described by its title - an area of '*great'* value and therefore high sensitivity. It has not been designated as an area of moderate landscape value and therefore medium sensitivity. Therefore, landscape designations identify landscapes of varying degrees of high value and sensitivity.

This anomily leads to confusion within the ES definitions as it is stated that a landscape of high sensitivity will have characteristics that '*...contribute significantly to the value of the landscape at a local, regional and national level'*.

2.3.5 The definitions of the sensitivity of the landscape characteristics are also questionable. The ES definition of medium sensitivity states that '*Key characteristics and features that are sensitive to the location of a wind farm, but with which the wind farm may also integrate'*. It is also stated that '*Landscapes in which it is possible to site and design a wind farm to have minimal impacts within the landscape'*. Therefore the definition is predicated on the assumption that the proposal will be successfully integrated. This is a matter for design development and the assessment of residual magnitude of effects rather than the assessment of landscape sensitivity.

2.3.6 The number of existing foci within the landscape ('*few existing foci'* – high sensitivity and '*occassional prominent foci'* – medium sensitivity) is not an appropriate criterion for assessing sensitivity. The sensitivity of landscape foci relates to their contribution as defining landscape characteristics as well as their vulnerability to the distraction of new foci.

2.3.7 The ES methodology used in the assessment of landscape sensitivity is flawed. This undermines the credibility of the ES assessment of landscape impact significance.

2.4 Visual Receptor Sensitivity

2.4.1 ES paragraph 9.19 defines visual resource as *'The nature and quality of a particular area or view in terms of its visual components (known as visual amenity).'*

ES paragraph 9.24 also states that *'The sensitivity of the visual resource to changes associated with the proposed development is defined as high, medium or low based on professional interpretation of a combination of parameters, as follows:*

- *Location and nature of the view;*
- *Direction and extent of the view;*
- *Value / importance of the view;*
- *Scope for mitigation (including ability of the view to absorb development); and*
- *Activity of the receptor and expectations, frequency and duration of the view.'*

This is broadly similar to GLVIA paragraph 7.31 which states that *'The sensitivity of visual receptors and views will be dependent on:*

- *The location and context of the viewpoint;*
- *The expectations and occupation or activity of the receptor;*
- *The importance of the view (which may be determined with respect to its popularity or numbers of people affected, its*

appearance in guidebooks, on tourist maps, and in the facilities provided for its enjoyment and references to it in literature or art).'

However, the ES adds '*scope for mitigation'* as a criterion. Therefore the definition is predicated on the assumption that the proposal will be successfully mitigated. However, this is a matter for design development and the assessment of residual magnitude of visual effects rather than the assessment of visual sensitivity.

The ES also adds '*the direction and extent of the view'* as a criterion. However, this is an issue to be addressed by the assessment of the magnitude of visual effect rather than the sensitivity of the view.

The ES revisions to the GLVIA criteria for the assessment of visual sensitivity confuse sensitivity and magnitude of effect thereby undermining the ES assessment of visual impact significance.

2.4.2 ES Table 9.3 sets out the ES definitions of high, medium and low visual sensitivity.

High Visual Sensitivity

'Focused view or panoramic view in whhich a wind farm would form the dominant focus, distracting from existing elements or features.

Existing view includes important landscape features with physical, cultural or historic attributes. Principal view from prominent buildings and residences, 'beauty spots' or popular viewpoints.

Area designated for scenic value, or en route or in a location valued for its visual amenity.

Wind farm difficult to integrate within visual composition, for example very complex pattern of elements, or these are very different prominance or scale to wind turbines.

Users of outdoor recreational facilities including those on footpaths, cycle routes or rights of way and popular hill or mountain tops, and key vehicular acces routes from which viewers' attention is directed to the landscape.'

Medium Visual Sensitivity

'Open, but unfoccused view in which a wind farm would be seen as one of several foci.

Existing view includes some important landscape features with physical, cultural or historic attributes. Forms secondary or marginal part of view from prominent buildings and residenses, 'beaty spots' or popular viewpoints.

View within area of some scenic value, although not designated. Or visible along route or in location that is valued as having scenic value.

Wind farm able to be accommodated within visual composition, for example in relation to linear features or pattern of point features, although this would result in some change to the pattern and / or nature of this composition. Wind turbines would be similar prominence to existing visual features.

Users of outdoor recreational facilitiies including local fotpaths, cycle routes or right of way, en route to locally popular hill or mountain tops whose attention may be focused on the landscape. Local access routes.

Low Visual Sensitivity

'Unfocussed and / or partially screened view in which a wind farm would be seen as a minor element of the view.

Existing view does not include important landscape features with physical, cultural or historic attributes. Site not clearly visible from prominent buildings or residenses, 'beaty spots' or popular viewpoints.

View not within area of recognised scenic value and not designated. Not visible from routes, or in location, which are valued for their visual amenity.

Wind farm able to be accommodated within visual composition, for example in relation to linear features or pattern of point features without significant change to the pattern and / or nature of this composition. Wind turbines would ne of similar or lesser prominence to existing visual features.

Local users whose attention is likely to be focused on work or activity rather than the wider landscape, for example using local access routes to travel to / from work or working within an industrial or commercial centre.'

2.4.3 The GLVIA glossary defines a visual receptor as a *'...viewer group that will experience an effect.'*

The GLVIA glossary defines visual amenity as *'The value of a particular area or view in terms of what is seen.'*

The ES Table 9.3 should be contrasted with the GLVIA which states in paragraph 7.32 states that:
'The most sensitive receptors may include:

- *users of all outdoor recreational facilities including public rights of way, whose attention or interest may be focused on the landscape;*
- *communities where the development results in changes in the landscape setting or valued views enjoyed by the community;*
- *occupiers of residential properties with views affected by the development.'*

Other receptors include:

- *people engaged in outdoor sport or recreation (other than appreciation of the landscape, as in landscapes of acknowledged importance or value);*
- *people travelling through or past affected landscapes in cars, on trains or other transport routes;*
- *people at their place of work.'*

GLVIA is explicit that visual sensitivity relates to the activity of the viewer which may or may not include viewing into or out of a valued landscape or of features within the landscape. Views of and within designated landscapes are assessed as part of landscape sensitivity.

In addition it is counter intuative to differentiate between the sensitivity of a walker en route to or at a moutain top or a viewer located within or outwith a designated landscape. The sensitivity of the viewer remains the same in each case.

2.4.4 The ES methodology used in the assessment of visual sensitivity is flawed. This undermines the credibility of the ES assessment of visual impact significance.

2.5 Landscape Magnitude of change

2.5.1 ES paragraph 9.26 states that *'The magnitude of change to the landscape resource arising from the proposed development at any particular point is described as high, medium, low, negligible or none based on the interpretation of a combination of largely quantifiable parameters as follows:*

- *The scale of the change;*
- *Whether the change would affect key landscape characteristics on which the distinctive qualities of the landscape character type rely and / or for which it is valued, and thus result in a loss of landscape resource;*
- *The nature of the change in relation to landscape characteristics and whether this is beneficial or adverse; and*
- *The duration of the change and whether this is temporary or permanent.'*

2.5.2 The ES parameters are broadly similar to the GLVIA glossary which defines magnitude as *'A combination of the scale, extent and duration of an effect.'*

This is expanded upon in paragraph 7.19 of the GLVIA which states that: *'There is no standard methodology for the quantification of the scale or*

magnitude of relative effects. However, it is generally based on the scale or degree of change to the landscape resource, the nature of the effect and its duration including whether it is permanent or temporary.'

2.5.3 ES Table 9.4 defines the levels of magnitude of change used in the ES for the assessment of magnitude of landscape (and visual) change:

	Definition of magnitude of change
High	*Fundamental change to the characteristics of the landscape or visual resource.*
Medium	*Considerable change to the characteristics of the landscape or visual resource.*
Low	*Noticeable change to the characteristics of the landscape or visual resource.*
Negligible	*Discernable change, but usually only in atypical circumstances, for example, exceptional weather conditions, or not influencing the key characteristics of the landscape or visual resource. These impacts are thus classified as the 'no change' situation.*
No change	*No change to the landscape or visual resource*

These definitions rely on an interpretation of the terms fundamental, considerable, noticeable and discernable none of which are explained in the ES or defined in the GLVIA.

Furthermore the definition of negligible magnitude in confused as atypical circumstances are not assessed in LVIA. GLVIA paragraph 2.35 confirms that general principles of good practice require the assessment to address the *'worst-case situation'* i.e. during clear visibility. The ES also confirms the negligible impacts are classified as *'no change'* which calls into question the inclusion of the negligible category.

2.5.4 Whilst stating that there is *'no standard methodology for the quantification of the scale or magnitude of relative effects'*, the GLVIA (Appendix 6) nevertheless sets out a series of example methodologies

used by practitioners. The most commonly used methodology is set out in Option 2 (GLVIA page 145).

Magnitude	***Typical Criteria***
High	*Total loss of or major alteration to key elements/features/characteristics of the baseline i.e. predevelopment landscape or view and/or introduction of elements considered to be totally uncharacteristic when set within the attributes of the receiving landscape.*
Medium	*Partial loss or alteration to one or more key elements/features/characteristics of the baseline i.e. predevelopment landscape or view and/or introduction of elements that may be prominent but may not necessarily be considered to be substantially uncharacteristic when set within the attributes of the receiving landscape.*
Low	*Minor loss of or alteration to one or more key elements/features/characteristics of the baseline i.e. pre-development landscape or view and/or introduction of elements that may not be uncharacteristic when set within the attributes of the receiving landscape.*
Negligible	*Very minor loss or alteration to one or more key elements/features/characteristics of the baseline i.e. pre-development landscape or view and/or introduction of elements that are uncharacteristic with the surrounding landscape – approximating the 'no change' situation.*

In contrast to the ES the GLVIA definitions are clear and unambiguos.

2.5.6 Whilst the ES parameters are similar to those set out in the GLVIA, the ES definitions of magnitude of landscape effect are ill defined and ambiguous. This undermines the credibility of the ES assessment of landscape impact significance.

2.6 Visual Magnitude of Change

2.6.1 ES paragraph 9.27 states that ' *the magnitude of change to the visual resource arising from the proposed development at any particular viewpoint is described as high, medium, low, negligible or none, based on the interpretation of a combination of largely quantifiable parameters as follows:*

- *Direction, extent and character of existing view;*
- *Scale of likely change in the view;*

- *Degree of contrast likely with the existing visual components, including extent of other built and vertical development visible;*
- *Distance of the viewpoint from the proposed wind farm;*
- *Duration of Effect;*
- *Proportion of the field of view occupied by the proposed wind farm;*
- *Direction of main view in relation to location of proposed wind farm; and*
- *Extent over which changes occur.'*

2.6.2 The ES parameters are broadly similar to those set out in GLVIA paragraph 2.32: *'In the evaluation of the effects on views and the visual amenity of the identified receptors, the magnitude or scale of visual change is described by reference to:*

- *the scale of change in the view with respect to the loss or addition of features in the view and changes in its composition including the proportion of the view occupied by the proposed development;*
- *the degree of contrast or integration of any new features or changes in the landscape with existing or remaining landscape elements and characteristics in terms of form, scale and mass, line, height, colour and texture;*
- *the duration and nature of the effect, whether temporary or permanent, intermittent and continuous, etc.;*
- *the angle of view in relation to the main activity of the receptor;*
- *the distance of the viewpoint from the proposed development;*
- *the extent of the area over which the changes would be visible.'*

2.6.3 Whilst the ES parameters are similar to those set out in the GLVIA, the ES definitions of magnitude of visual effect (as discussed in paragraphs 2.5.3

and 2.5.4) are ill defined and ambiguous. This undermines the credibility of the ES assessment of visual impact significance.

2.7 Nature of Effect

2.7.1 ES paragraph 9.30 states that *'To determine whether impacts are adverse (negative) or beneficial (positive), the following criteria are used:*

- *'Adverse' – the key characteristics of the landscape and visual resource are compomised;*
- *'No impact' – the key characteristics of the landscape and visual resource are not affected; and*
- *'Beneficial' – key characteristics of the landscape and visual resource are reinforced.'*

2.7.2 The ES definitions are similar to those used in the GLVIA. Visual effect is defined in the GLVIA glossary as '*Change in the appearance of the landscape as a result of development. This can be positive (i.e. beneficial or an improvement) or negative (i.e. adverse or a detraction).'* The key determinant is whether the proposed development will detract from or improve the existing landscape and visual resource.

2.8 Significance

2.8.1 The GLVIA glossary does not define significance however paragraph 7.42 of the GLVIA states that no '*…formal guidance exists for the assessment of significance for landscape and visual effects and the assessor must clearly define the criteria used in the assessment for each project, using his or her skill based on professional judgment…'*

2.8.2 GLVIA paragraph 7.51 also states that *'The individual carrying out the landscape and visual impact assessments should use a method and*

criteria that is appropriate to their assessment. It should also be remembered that the assessment is not required to describe every effect of the proposed development, only the main or likely significant effects on the environment which are required to inform the decision-making authority in their determination of the planning application'.

2.9 Significance of landscape effects

2.9.1 ES paragraph 9.33 sets out the factors considered in the ES assessment of landscape impact significance, the majority of which have been previously discussed. However the following factor is a new criterion:

- *'The type and rate of other changes likely to occur in the landscape resource of the study area in the future.'*

It is assumed that this is in reference to future wind farm development (as this is the most likely form of change to the landscape) and the consequential cumulative effects. Cumulative effect is a particular concern with the Dorenell Windfarm not only due to its cumulative effects with existing and currently proposed wind farms but also the precedent set by this particular wind farm for future windfarm development within the AGLV and in close proximity to the Cairngorms National Park.

2.9.2 GLVIA paragraph 7.43 provides general guidance on the assessment of the significance of landscape effects:

- *The loss of mature or diverse landscape elements, or features, is likely to be more significant than the loss of new or uniform/homogenius elements.*
- *Effects on character areas, which are distinctive or representative, may be more important than the loss of areas in poor condition or*

degraded character which may, however, present greater opportunities for enhancement.

- *The loss of landscape elements, features or characteristics will be given greater weight if they are identified as being of high value or importance. Thus, effects on landscape areas or characteristics recognised for their national importance are likely to be of more significance than effects on areas or characteristics of local importance. The test is whether the integrity of the landscape and objectives of designation are compromised or not.*
- *The sensitivity of the landscape is dependent on both the attributes of the receiving environment and the characteristics and effects of the proposed development and can only be established by carrying out the assessment. However, landscapes with a high value and sensitivity to the type of change proposed are likely to be more seriously affected by the development than those with a lower sensitivity.*
- *The test of significance is not directly related to planning policy. However, this may be an important consideration where policies identify commonly held objectives and values.'*

The value attached to the characteristics of the landscape resource (and the '*commonly held objectives'* of planning policy) is an important consideration in the assessment of significance of landscape effects. This guidance is recognised by the categories of landscape impact significance identified in ES Table 9.5.

2.10 Significance of Visual effects

2.10.1 ES paragraph 9.34 sets out the factors considered in the ES assessment of visual impact significance, which have all been previously discussed.

2.10.2 The GLVIA paragraph 7.49 offers general guidance on the judgement of the significance of visual effects:

- *'Large-scale changes which introduce new, discordant or intrusive elements into the view are more likely to be significant than small changes or changes involving features already present within the view.*
- *Changes in views from recognised and important viewpoints or amenity routes are likely to be more significant than changes affecting other less important paths and roads.*
- *Changes affecting large numbers of people are generally more significant than those affecting a relatively small group of users...'*

This guidance is recognised by the categories of visual impact significance identified in ES Table 9.6.

2.11 Significance Threshold

2.11.1 ES paragraph 9.38 states that *'EIA Regulations require judgement on the acceptability of a scheme to occur in the full knowledge of the likely significant effects on the environment. However, GLVIA explains that 'in the context of EIA, however, 'significance' varies with the type of project and the topic under assessment' and 'it may be helpful to define levels or categories of significance (including 'not significant') appropriate to the nature, size and location of the proposed development'. To satisfy these requirements, it is stated that, where landscape or visual impacts of either moderate or substantial impact are identified by the LVIA, as described within Tables 9.5 and 9.6 above, these should be considered as a*

significant effect as per the ES Regulations. Accordingly, slight, negligible or no impacts are considered not significant.'

However, this statement is caveated by the previous ES paragraph which states that '*Wherever possible, identified effects are quantified, but the nature of landscape and visual assessment often requires interpretation by professional judgement.'*

Ultimately professional judgement will have a major role within LVIA however the professional judgements should be made in the context of an assessment methodology that is properly representative of effects and uses criteria that result in a balanced assessment of significance. The ES fails in this fundamental requirement.

3.0 Conclusion

3.1 Summary

3.1.1 The ES viewpoints do not accord with published guidance and are not properly representative of the landscape and visual resource and potential receptors of significant effects.

3.1.2 The ES methodology used in the assessment of landscape and visual sensitivity is flawed.

3.1.3 The ES definitions of magnitude of landscape and visual effect are ill defined and ambiguous.

3.1.4 Whilst the criteria for the assessment of significance are in general accordance with GLVIA guidance the professional judgements are based upon inadequate viewpoints as well as flawed methodology for the

assessment of both landscape and visual sensitivity and magnitude of change. This undermines the credibility of the ES assessment of landscape and visual impact significance.