Appendix 2 - Response To Landscape and Visual Related Queries

Project: Gloucestershire Residual Waste Project
Title: RESPONSE TO LANDSCAPE AND VISUAL RELATED QUERIES RAISED BY BUREAU VERITAS TO THE PLANNING SUBMISSION DOCUMENTS
Date: 7 June 2012

1.0 INTRODUCTION

1.1 This Technical Note has been prepared by Axis on behalf of UBB to provide a response to those matters raised by Bureau Veritas (BV) in their review of those landscape and visual related matters identified in the BV April 2012 Environmental Statement Review. It is understood that the BV review report was commissioned by GCC planning authority to assist their review of the Javelin Park EfW Environmental Statement (ES) submissions as supplied by the applicant Urbaser Balfour Beatty (UBB).

1.2 This Technical Note seeks to provide a review of the key points raised by the ES review report.

2.0 OVERVIEW RESPONSE BY APPLICANT

2.1 We note that Bureau Veritas have not visited the site and that their comments are based upon a desk-review of the ES only and that several of the comments raised by Bureau Veritas appear based upon misreading/misinterpretation of the ES.

2.2 We also note that Bureau Veritas recommendation is that the proposed development be approved, i.e. that there are no grounds for refusal on landscape and visual grounds.

3.0 POINT BY POINT REVIEW

Points for Clarification (as requested by Bureau Veritas)

3.1 BV Query 1: Confirmation that viewpoint for the photomontages were agreed with the local authority and with the Cotswold AONB Board.

3.2 Axis Response: The LVIA identifies clearly and in detail describes (paragraph 8.3.35-8.5.37 and in particular Appendix 8.4) the process by which viewpoint location were chosen and which bodies were consulted as part of this process. To reiterate what is stated in Appendix 8.4 of ES, the following bodies were consulted re. viewpoint locations, initially in May 2011 and then again to agree final viewpoints in August 2011.
- Gloucestershire County Council;
- Stroud District Council;
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- Gloucester City Council
- Forest of Dean District Council;
- Natural England;
- Cotswold Conservation Board

3.3  **BV Query 2: Production of a Zone of Visual Influence (ZVI) taking into account blocks of vegetation and settlements**

3.4  **Axis Response:** Axis do not consider that this would add any significant value to the assessment nor aid in understanding its conclusions. The location of major features in relation to the ZTV can be gleaned from Figure 8.3 of the ES. To include vegetation or buildings in any computer modelled ZTV/ZVI cannot be done with any reasonable accuracy as every tree, hedge and building would need to be surveyed and modelled individually, to derive the height data from each of these. Also such modelling would not take account of the orientation of property windows or gardens, gaps in foliage or breaks in hedges. Whilst a ZVI could be prepared manually, we do not believe that this would add any value to the assessment. The influence of vegetation and structures upon views can be ascertained by reference to the Viewpoint figures (ES Figures 8.4a-y).

3.5  **BV Query 3: LVIA of heritage sites within the study area defined by the ZTV including historic designed landscapes**

3.6  **Axis Response:** It is not appropriate to assess views from heritage assets as part of an LVIA. The visual impact assessment part of LVIA is concerned with effects upon the population, i.e. those who would have a view of the development. An assessment of effects upon heritage assets (set out in Chapter 15.0 of the ES and the supplementary Cultural Heritage assessment provided in the Regulation 22 submission) is concerned with the effects upon the heritage significance of the assets in question, not with whether a particular development is visible from any given asset. Whilst visual change may often lead to change in setting, there is no direct relationship.

In some cases, a single feature may be both a visual receptor and a heritage asset, for example a residential property that is also a listed building. In this case, the LVIA would assess the change in view upon those who live there, in the same way as for any non-listed property or other visual receptor. The effects on the property as a listed feature would be addressed in the cultural heritage assessment. The same property could also be a receptor in a noise assessment.

Chapters 8.0 and 15.0 of the ES, and the supplementary Cultural Heritage assessment provided in the Regulation 22 submission, assess different environmental effects, using different methodologies. For an understanding of the effects upon setting, reference should be made to Chapter 15.0 and the supplementary Cultural Heritage assessment provided in the Regulation 22 submission. It is, however, worth noting that when assessing the effects upon setting, the visibility of the proposed development from any particular heritage asset was an important consideration.

To provide further clarification, in assessing the effects of the proposed development upon heritage assets, considerable liaison was carried out...
between the project archaeologist and the project landscape archaeologist to determine the likely visibility of the proposal from those assets included in the assessment. This included the use of the ZTV as an initial indicator of potential visibility, but was more usefully informed by site visits undertaken separately by both professionals.

3.7 **BV Query 4: LVIA in relation to the Cotswold AONB**

3.8 **Axis Response:** The effects of the proposed development upon the Cotswold AONB have been assessed within the ES. Nonetheless the applicant has chosen to provide a supplementary assessment on the effects of the proposed development on the AONB, this is included as part of the Regulation 22 submission provided to GCC.

It should be noted that a comment made by Bureau Veritas in relation to ES paragraphs 8.8.6 and 8.8.7 misquotes the second paragraph and as such misunderstands the conclusions of the ES. Bureau Veritas refer to (paragraph 8.8.7) “the views westwards to the Cotswolds Escarpment” and go on to refer to a material effect on views from the AONB and from the Cotswolds Way. This is wrong, the paragraph (and paragraph 8.8.6) refers to the views of the Cotswolds Escarpment from the west, i.e. to how the proposed development at the skyline formed by the escarpment would appear in the same field of view when viewed from locations west of the development site (as an example from Viewpoint 30 – Figure 8.4v). Both this relationship and the views from the top of the Escarpment towards the site were key considerations in the design of the proposed development (refer to paragraphs 8.2.7-8.2.9 and 8.6.82-8.6.96). We are confident that the ES and the accompanying figures and appendices demonstrate adequately that effects upon the AONB would not be significant.

**Recommendations (made by Bureau Veritas)**

3.9 **BV Recommendation 1: Undertake a residential amenity survey in the relation to the close vicinity of the site including assessment of effects on users of amenity routes and viewpoints;**

3.10 **Axis Response:** The effects of the proposed development upon visual amenity are addressed by relation to the Viewpoints included in the assessment (refer to Appendix 8.5 of the ES). Nineteen of the thirty-four viewpoints included in the assessment are located within 2.5km of the site and illustrate the view towards the proposed development from a variety of directions and receptor types. Further discussion is set out in paragraphs 8.6.47-8.6.66, which describe the pattern of visual effects that would occur in the vicinity of the site and add context to the more detailed assessment of effects upon each viewpoint (Appendix 8.5).

Other amenity issues, for example in relation to noise, air quality etc… are addressed in the relevant ES Chapters.
3.11 **BV Recommendation 2: Agree assessment of further viewpoints from the Cotswolds Way and escarpment if required by the Cotswold AONB Board**

3.12 Axis Response: See response to BV Query 1. Five viewpoints were located along the Cotswolds Way at prominent high points along the route. Figure 8.3 of the ES illustrates both the ZTV of the proposed development and the Cotswolds Way. Theoretical visibility from the route is not extensive and in places would be further restricted by woodland cover, for example in the vicinity of Standish Wood.

3.13 **BV Recommendation 3: Review colour scheme options for the building cladding and elevations;**

3.14 Axis Response: The Design and Access Statement describes the reasoning behind the colour selection and also the application of the chosen colours to the buildings and includes photomontages of an alternative colour scheme. The Design and Access Statement demonstrates how the form, colour and layout of the buildings have been selected to reduce visual impacts, especially from vantage points on the Cotswolds AONB that have views towards the site. We note Bureau Veritas suggest that colour options could be determined by planning condition.

3.15 **BV Recommendation 4: Undertake a lighting assessment of the proposed development.**

3.16 Axis Response: Paragraphs 8.6.78-8.6.81 set out an assessment of night-time effects that would result from the proposed development, and conclude that these would not be significant given the existing context of motorway lighting, and the proposed mitigation measures inherent in the lighting scheme for the development (as described in Chapter 5.0 of the ES and summarised in Chapter 8.0). Full details of the lighting design for the proposed development are set out Appendix 5.2. Given this, we feel no further action is required in relation to this point. We also note Bureau Veritas suggest that a lighting scheme and mitigation options be subject to planning condition.

4.0 **OTHER POINTS RAISED BY BUREAU VERITAS**

4.1 Bureau Veritas disagree with the Applicant’s conclusion as to the nature of effects at six viewpoints (nos. 6, 13, 26, 30 and 31). We note that this is a subjective area and that two professionals or indeed any two persons may disagree as the nature of effects. We are however confident that our conclusions that the nature of effects from the stated viewpoints are neutral is justified. We believe that the proposed development would not appreciably detract from the view at any of these viewpoints. In particular relation to viewpoints 30 and 31, the design of the roof of the facility would accord closely with the Cotswold Escarpment visible to the rear and would respect this existing landform. As such we stand by the assertion that the impact would be negligible in nature.

Bureau Veritas state that a plan showing existing landscape features associated with the study area and development site would have been useful...
and is recommended. We believe that Figures 8.1, 8.2a and in particular 8.2b and 5.10 fulfil this role.

Several comments are raised in respect of views being described but not assessed from various locations. This seems to be based on a misunderstanding as to what the LVIA actually contains. The detailed assessment of visual effects is carried out from a series of representative viewpoints (and the change in view resulting from the proposed development is illustrated from the majority of these, by either photomontage or by indicating the outline of the proposed development), which were agreed with consultee bodies (refer to response to BV Query 1). Context is added to this in paragraphs 8.6.46-8.6.71, which describe the visibility of the proposed development from the wider study area. This is a commonplace approach to LVIA and accords with best practice as set out in Guidelines for Landscape and Visual Impact Assessment (Landscape Institute and Institute of Environmental Management and Assessment 2002).

Views from the Cotswold AONB are addressed in detail (refer to the responses to point 4 and 6).

Bureau Veritas state that landscape mitigation is not described in Chapter 8.0. This is not correct. Paragraphs 8.2.6-8.2.11 describe the landscape mitigation measures that have been incorporated in the design of the development. Particular attention is given the relationship between the roof of the facility and the Cotswold AONB; this is reiterated elsewhere in the assessment.