

Proposed Residential Development on
Land between Houghton Grange and The How
Houghton Road, Houghton
Application Ref: 23/00627/OUT



REVIEW OF APPLICANT'S LANDSCAPE AND VISUAL APPRAISAL(LVA)

prepared by

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on behalf of

Houghton and Wyton Parish Council

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1. Introduction

- 1.1 I have been commissioned by Houghton and Wyton Parish Council to carry out a review of the landscape and visual impacts of the proposed residential development on land between Houghton Grange and The How, Houghton Road, Houghton (ref 23/00627/OUT). The description of development is as follows:

Outline planning permission with all matters reserved for the construction of up to 120 homes (Use Class C3) with associated public open space, landscaping, play areas, surface water attenuation, roads, car parking, pedestrian and cycle routes, utility infrastructure and associated works

- 1.2 A landscape and visual appraisal (LVA, AECOM, March 2023) has been submitted in support of the application. This document comprises a review of the LVA in terms of its compliance with best practice and comments on whether its findings appear to be robust, complete and reasonable.

- 1.3 The exercise has been informed by the relevant technical guidance¹, which advises that such reviews should consider:

- the methodology used to undertake the assessment, the criteria selected (including balance between), and the process followed;
- the baseline, content and findings of the assessment; and
- the presentation of the assessment findings.

- 1.4 The review has been based on:

- the submitted LVA material and other relevant application documents/drawings;
- published guidance and policy documents (notably GLVIA3²); and
- a visit to the site and surrounding area;

Limitations

- 1.5 The following limitations should be noted:

- This review does not purport to be an LVA/LVIA in its own right, and therefore does not attempt to identify and categorise all the potential effects;

¹ Reviewing LVIA's and LVAs, LI TGN 01/20 (January 2020)

² Guidelines for Landscape and Visual Impact Assessment, LI/IEMA, 2013

- It has not at this stage included a detailed technical audit of the photographic and visualization material;
- Consequently, it places a degree of reliance on the submitted material;
- The fieldwork undertaken for this review was confined to publicly-accessible locations, and only selected viewpoints were visited;
- The review has not considered the status of, or the weight to be given to, relevant policy; and
- Issues such as urban design, sustainability, biodiversity or cultural heritage have not been addressed, except where these may influence landscape/visual matters.

2. Compliance with Best Practice

2.1 The LVA has been reviewed in terms of its compliance with the main requirements of the process as set out in GLVIA3 and prevailing practice; this is presented in **Table 1** below. Responses that raise queries or potential concerns are shown in bold and are addressed in Section 3.

Table 1: LVIA 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	LVIA Appendix A
1.4 Does the assessment state whether the effects are beneficial, adverse or neutral?	Yes	
1.5 Does the assessment distinguish between the effects of construction and the completed development?	Yes	
1.6 Where a potential for adverse effects has been identified, has mitigation been proposed?	Yes	Embedded/primary mitigation is described in LVA Section 6 and is shown on LVA Appendix B, Figure 6: Parameter Plan
1.7 Has the effectiveness of this mitigation been assessed (e.g. by reporting effects at Years 1 and 15)?	Yes	
2. Presentation		
2.1 Is the LVA clearly structured and presented?	Yes	
2.2 Is it adequately supported by:		
- Maps/plans?	Yes	LVIA Appendix B
- ZTV?	Yes	
- Photos?	Yes	
- Visualizations?	Yes	
3. Landscape Character		
3.1 Has reference been made to published LCAs at the appropriate levels?	Yes	At national (NCA 88) (LCA 4.2.3.1) and district (Huntingdonshire LCA/TCA, LVA 4.2.3.2) levels.
3.2 Has the character of the site been adequately described and assessed?	Partly	Whilst the site is described (LVA 4.2.2), neither it nor its landscape/perceptual attributes (e.g land cover, landform, significant

		vegetation, openness) have been treated as receptors for assessment purposes.
3.3 Has the site's representativeness of/contribution to the published character types/areas been assessed?	No	There is no explicit consideration of this in LVA Section 7, since the site is not identified as a receptor.
3.4 Have relevant designations been identified?	Yes	There are no landscape designations within the study area. However, the Houghton & Wyton and St Ives Conservation Areas adjoin the site, and the settings of such areas are a material consideration.
3.5 Have the relevant landscape receptors been assessed?	No	Landscape receptors are confined to the district-level LCAs – ref LVA Section 7. Neither the site, its landscape components and perceptual attributes, the adjoining conservation areas or their component sub-areas are identified as receptors.
3.6 Has landscape sensitivity been assessed on the basis of its susceptibility and value?	Yes	LVA Section 7.
3.7 Has the LVA considered whether the site may form part of a valued landscape?	No	The value of the site and its immediate setting (which includes parts of the conservation areas) has not been explicitly considered.
4. Visual Impact		
4.1 Has a ZTV/ZVI been produced?	Yes	Ref LVA Figures 4 + 5
4.2 Were the assessment views agreed with the LPA?	Assumed Not	Since there is no reference to such agreement in the LVA.
4.3 Are these views sufficiently representative?	Partly	See below – Whilst 20 views suggest a reasonable degree of coverage overall, a query have been raised about viewpoint selection.
4.4 Have seasonal influences been taken into account?	Partly	Although the photos were taken in July, the Y1 assessment is based on a winter (i.e worst-case) scenario - but the Y15 assessment is based on a

		summer (i.e. best-case) scenario.
4.5 Can the photography and visualizations be relied upon?	Assumed So	In the absence of a detailed technical audit.
4.6 Have all potential receptors been identified?	Partly	Ref LVA Section 5.2 – subject to query relating to viewpoint selection
4.7 Has their sensitivity been properly assessed?	Partly	Ref LVA Section 7 – queries have been raised about the sensitivity of some residents and users of PRowS.
5. Policy Considerations		
5.1 Does the LVA set out the landscape policy context?	Yes	LVA Section 2
5.2 Does the LVA comment on the degree to which the proposed development complies/conflicts with relevant policy?	No	But this is not unusual, and is typically addressed in the applicant's Planning Statement.

3. Key Points Arising

3.1 Whilst the LVA has been carried out in accordance with the principles of the guidance, the following queries and potential deficiencies should be noted:

- i. The site and its component landscape/perceptual attributes have not been identified as landscape receptors for assessment purposes;
- ii. The site's representativeness of/contribution to the published LCAs has not been assessed;
- iii. The conservation areas adjoining the site (and their component sub-areas) have also not been identified as landscape receptors;
- iv. There has been no explicit consideration of whether the site may form part of a valued landscape;
- v. The assessment views do not appear to have been agreed with the LPA;
- vi. The location/representativeness of some of the viewpoints – the Parish Council is of the opinion that longer-distance views from the south/south-east should have been considered;
- vii. Seasonal influences on visibility and effects are not evident from the photography/visualizations;
- viii. The reliability of the visual material has been taken as read; and
- ix. The sensitivity of some visual receptors.

Effects on the Site and its Component Attributes

3.2 The assessment of landscape character effects is essentially an aggregating exercise, whereby changes to individual landscape components and perceptual attributes may to varying degrees "cascade upwards" through each specific site, locality, neighbourhood, study area and hierarchy of published character areas (district to national).

3.3 This is reflected in the guidance, which states that "*The first step [in predicting landscape effects] is to identify the components of the landscape that are likely to be affected..., often referred to as the landscape receptors, such as overall character and key characteristics, individual elements or features, and specific aesthetic or perceptual aspects.*" [GLVIA3, 5.34 bullet 1].

3.4 Since the LVA does not follow this approach, and identifies only the district-wide LCAs as receptors, it is difficult to understand how it has arrived at its assessment of effects on them. This is particularly the case because there is

no explicit consideration of how the site or its component attributes may be representative of, or contribute to, the key characteristics of the LCAs.

Effects on the Conservation Areas

3.5 The relationship of the site to the two conservation areas is shown in **Figure 1** below (extracted from the DAS). Whilst conservation areas are primarily heritage designations, they often have landscape (as well as townscape) implications, particularly where they may include greenfield land and/or possess a wider setting. That is the case here.

3.6 The ZTV mapping (LVA Figures 4/5) indicates that the proposed development would potentially be visible from parts of Hemingford Meadow (within the St Ives CA) and from both the southern part of the Houghton and Wyton CA (which falls within the site) and the northern part (which adjoins the site and Houghton Hill Road). The LVA fails to assess whether there would be any effects on the character or setting of either CA.

Figure 1: Relationship to Designations



Valued Landscape

3.7 The LVA does not consider whether the site may form part of a valued landscape, and thereby worthy of consideration under NPPF174(a), by following

either Box5.1³ or Table 1 in TGN02/21⁴. It is not the purpose of this review to carry out such an assessment or to put forward a case for the site to be regarded as such.

- 3.8 However, whilst most of the site is not officially accessible to the public, and its northern part is of unremarkable character, its sloping southern part is more distinctive. In addition, its south-western part falls within both the Houghton Grange Grassland County Wildlife Site and the Houghton and Wyton CA, whilst its setting to the south extends across the Ouse valley, which is clearly a landscape of some scenic, biodiversity, recreational and heritage value.
- 3.9 In addition, the site falls within a section of the Great Ouse Valley which has for a decade been promoted as a potential Area of Outstanding Natural Beauty (AONB). AONBs define landscapes that are of national importance for the protection and enhancement of their natural beauty, designated under the National Parks and Access to the Countryside Act, 1949.
- 3.10 The relevant section of the valley broadly extends from St. Neots to Downham Market. In the vicinity of St. Ives, the boundary excludes most of the built-up area and is defined to the north by the A1123/Houghton Road – it therefore includes the application site.
- 3.11 Whilst candidate AONB status has no formal standing in policy terms, it clearly indicates a degree of consensus about the value of the landscape, and suggests that the site is considered to contribute to that value. This has not been acknowledged in the LVA.

Visual Assessment

- 3.12 It is good practice to agree the assessment views with the LPA. Since the LVA makes no reference to such an agreement, it is assumed that this was not the case here.
- 3.13 The assessment has been based on 20 representative viewpoints, as shown on **Figure 2** below. These are presented as “Type 1” visualizations (i.e. existing views annotated to show the site extent, blue dots), of which six were then used for the preparation of “Type 4” visualizations (i.e. existing views with the development envelope added, pink dots).
- 3.14 At first sight, this appears to represent a reasonable number and distribution of views. However, in view of the parish council’s concerns about implications for the perceived separation between Houghton and St Ives, additional viewpoints looking towards the site from both directions along Houghton Road would have been helpful.

³ GLVIA3 p84

⁴ Assessing landscape value outside national designations, Landscape Institute, February 2021

3.15 Whilst no detailed technical audit of the ZTV, photography or visualizations has been undertaken at this stage, a preliminary review of this material (by MS Environmental) has raised the following points:

- The 2km radius for the ZTV is inadequate for buildings 10m in height (e.g. solar arrays are typically 3-4km in height, but their ZTVs typically extend to 5km).
- The ZTV with visual buffers is poor, as it identifies viewpoints with no visibility.
- Whilst there are 20 identified viewpoints, all but three have no view of the site and should probably have been replaced; these include four of the six "Type 4" visualizations.
- Winter and summer photography should have been provided for each viewpoint.
- Viewpoint 6 ("Type 3") fails to capture the full extent of the site and is a poor example; in addition, it is not clear why this is specified as Type 3 rather than Type 4.
- There should be additional closer-range viewpoints along Houghton Road and the Ouse Valley Way.
- The reference to a 10-15m tolerance on the Parameter Plan is ambiguous, although it is assumed to apply to layout.

3.16 Whilst the LVA allows for variations in effects between summer and winter conditions, these are not evident in the photography and visualizations, which only show the former (i.e. the least-visibility scenario). A winter version of the material would have provided substantially greater confidence in its reliability, and in the judgments based on it, and in view of the March submission date for the LVA could conceivably have been provided.

3.17 Finally, the discrepancies in sensitivity between the same categories of visual receptor are not readily explicable. Of the six receptor groups comprising users of PRoWs or public access land, three are of medium sensitivity and three are high. In addition, all residential receptors are considered to be of medium sensitivity. This is despite the advice in GLVIA3 that "*visual receptors most susceptible to change are...likely to include...residents at home [and] people engaged in outdoor recreation, including use of public rights-of-way...*".

Figure 2: ZTV with Viewpoint Locations



4. Critique of LVA Findings

Sources of Impact

4.1 Since the development is fully described in the Design and Access Statement and elsewhere, a summary of the main sources of landscape/visual impact will suffice as follows (for reference purposes, the Parameter Plan is presented in **Figure 3**):

- The current use of most of the site (as former pasture) would be displaced.
- The Arboricultural Impact Assessment reports the following regarding tree loss:
 - Thirteen individual trees, eight full groups and part of eight groups are to be removed to facilitate the Proposed Development; this includes part of four groups classed as high quality (Category A), three individual trees and part of two groups classed as moderate quality (Category B) and the remaining ten individual trees, eight full groups and part of two groups classified as low quality (Category C).
 - In addition, nine individual trees, three full groups and part of one group which are identified as unsuitable for retention (Category U) in the context of the current land use are also required for removal to facilitate the Proposed Development. These trees are arguably not suitable for long term retention and their removal is justified regardless of the Proposed Development.
 - Further tree removals may be required to facilitate the installation of pedestrian footways within the RPAs of G269, G270, G315 and G319 (of high quality) and G196 and G333 (of moderate quality)
- The part of the site to be developed is gently sloping and would to a degree need to be reprofiled to accommodate the building footprints and access/parking areas.
- Vehicular access would be provided off the constructed Houghton Grange Phase 1 access road.
- The buildings would be a maximum height of two storeys (10m to ridge).
- The development area would occupy c22.5% of the site, concentrated in its north-western corner.

- The remainder of the site would comprise green infrastructure, including a mix of informal amenity space, children’s play, habitat creation, a SuDs pond, retained tree cover and new structural planting, with new pedestrian/cycle links to the surrounding area.
- Once completed and occupied, the development would introduce lighting onto what is currently an unlit site (although the nearby sections of Houghton Road and adjoining built-up areas are lit).

Figure 3: Parameter Plan



Construction Effects

4.2 The LVA predicts the landscape character effects to be no greater than minor adverse (for LCA4: Ouse Valley) and the visual effects to be no greater than moderate adverse (for users of the informal path on the southern part of the site, travellers on Houghton Road and residents of Garner Drive) [ref LVA 8.1.1.3].

- 4.3 These conclusions appear to be consistent with the judgmental framework used in the LVA. In relation to the landscape effects on LCA4, LVA Table 3-9 (in LVA Appendix A) indicates that a low magnitude of change to a highly sensitive receptor can give rise to a moderate/minor effect, and it is assumed that the conclusion of minor in this case reflects the limited duration of the works.

Year 1 Landscape Effects

- 4.4 The LVA predicts that the landscape character effects would be no greater than minor adverse, in relation to LCA3, resulting from a low magnitude of change to a receptor of high sensitivity [LVA 8.1.2.3]. This reflects the relatively low sensitivity part of the site where built development would be located, together with its insignificant proportion of/peripheral location within the LCA, and its separation from the remainder of the LCA by St Ives Thicket.
- 4.5 Whilst this logic appears to be reasonable, an explicit evaluation of the role of the site within the LCA would have been helpful. In addition, the district-wide LVAs are relatively large-scale units, and LCA4 includes locally significant variations in character such as the St Ives urban fringe, the Houghton Grange estate/recent residential development, the valley slopes, River Ouse floodplain and valley crest (where the built development would be located).
- 4.6 A finer-grained assessment may well have teased out more meaningful variations in effect. Such an approach should arguably have considered the potential for effects on the character and/or setting of the two conservation areas (rather than leaving this entirely as a matter for the Cultural Heritage DBA), and also the relevant character areas identified in Appendix 1 of the Neighbourhood Plan.
- 4.7 In relation to the St. Ives CA, the DBA reports that “...it is possible that buildings on the southern edge of the developed area will be visible from the boundary of the conservation area on the north edge of St Ives Thicket” [DBA 6.2], and that “The setting of the conservation area to the north of St Ives Thicket will be changed by the Proposed Development which will introduce built development to part of the setting that was formerly agricultural” [DBA 6.4].
- 4.8 In relation to the Houghton and Wyton CA, the DBA reports that “The Proposed Development has the potential for impact on two character areas of the Houghton and Wyton Conservation Area, Houghton Hill and Thicket Road East and The Meadows” [DBA 6.5], and that “Impact on the conservation area as a result of the Proposed Development will...be confined to the boundary with Phase 1 of the Houghton Grange development” [DBA 6.6].

Year 1 Visual Effects

- 4.9 The LVA predicts that the visual effects at Y1 would be moderate adverse for two of the 14 receptor categories, minor adverse for one, negligible for one,

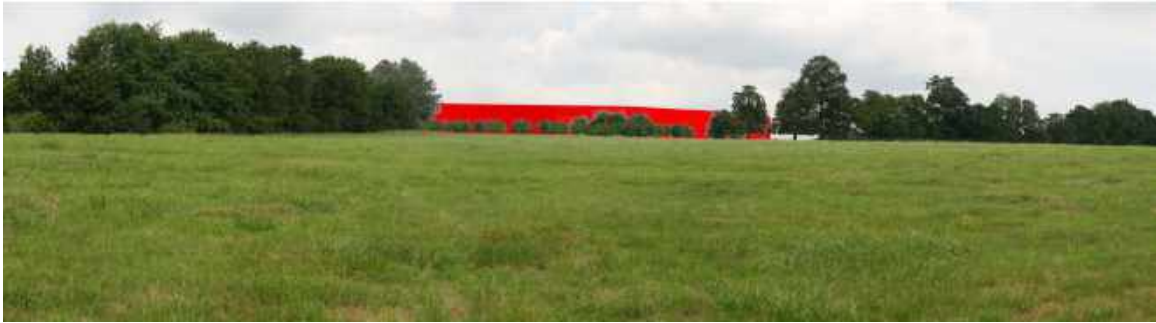
and neutral for the remaining 10. Table 3-9 in LVA Appendix A makes it clear that neutral essentially means “no effect”, since it results from no change.

- 4.10 This very limited range of effects, together with the absence of any effects of major magnitude - even though this relates to the worst-case scenario (winter, before landscaping has begun to take effect) - invites scrutiny. The greatest effects relate to views 5 and 6.
- 4.11 For VP5, the LVA predicts that medium sensitivity x medium change would give rise to a moderate adverse effect. However, as noted previously, footpath users could legitimately be considered to be of high sensitivity where their setting contributes to their amenity. If that were to be applied here, the effect could be categorised as major or moderate.
- 4.12 For VP6, the LVA predicts that medium sensitivity x a high degree of change would give rise to a moderate adverse effect. However, Table 3-9 in LVA Appendix A indicates that such a combination can give rise to a major or moderate effect. The “Type 4” visualization for VP6 indicates that the development would amount to a fundamental change to what is currently an open view (beyond Houghton Road), it is not clear why a major effect has not been reported in this case.
- 4.13 The visualizations for the remaining VPs indicate that vegetation would obstruct views of the development, notably from VPs 5 and 8. This rapid falling away of visibility with distance from the site is not entirely uncommon. However, due to the absence of winter views from such locations, we have no option but to take the conclusions of the LVA at face value.

Year 15 Effects

- 4.14 By Y15, the LVA predicts that the effect on LCA4 would be reduced to negligible, and that the effects on the receptor groups represented by VPs 5 and 6 would be reduced to minor adverse, with all other visual effects becoming either negligible or neutral [LVA 8.1.3.3]. This reduction in effects, typically by an order of magnitude, is a common outcome in LVA, and reflects the assumed effectiveness of the proposed landscaping in integrating the development into its landscape context and screening specific views.
- 4.15 Scrutiny of the Y15 visualizations for VPs 5 and 6, however, suggests that this assumption should not necessarily be taken at face value. In relation to VP5, the Y1 visualization clearly shows what could legitimately be regarded as a major effect, with the development closing the skyline gap between the tree-belt within the site (to the right) and the trees within the Houghton Grange site (to the left). The Y15 visualization shows this gap to remain closed, with the development likely to remain visible beyond the proposed tree planting (and probably even more so in winter). This comparison is shown in **Figure 4** below.

Figure 4: Year 1 and Year 15 Visualizations for VP5



4.16 In relation to VP6, the Y1 visualizations shows the open view beyond Houghton Road completely obstructed by the proposed development. This obstructing and urbanizing effect would remain at Y15, with relatively little mitigation provided by the proposed landscaping around the site entrance/Houghton Road frontage. This comparison is shown in **Figure 5** below.

Figure 5: Year 1 and Year 15 Visualizations for VP6



5. Summary and Advice to the Parish Council

Robustness of LVA and its Findings

- 5.1 The LVA is considered to be consistent with the principles of GLVIA3. However, reservations have been identified in relation to the following:
- i. Its failure to assess the effects on site character and its component landscape/perceptual attributes;
 - ii. The absence of explicit assessment of the site's representativeness of/contribution to the published LCAs;
 - iii. Its failure to assess effects on the character/setting of the conservation areas that adjoin/lie partly within the site (although this is addressed in the Cultural Heritage DBA);
 - iv. Its failure to consider whether the site may form part of a valued landscape, despite its location within an area under consideration for potential designation as an AONB;
 - v. The absence of any finer-grained breakdown of the character effects below that of the district-level LCAs (including, for example, the character areas from the Neighbourhood Plan);
 - vi. The apparent absence of agreement of the assessment views with the LPA;
 - vii. The extent and basis for the ZTV, and the location/representativeness of some of the viewpoints, 85% of which indicate no view of the site;
 - viii. The absence of worst-case (winter) versions of the photography/visualizations;
 - ix. The need to take the reliability of the visual material as read at this stage;
 - x. Potential under-reporting of the sensitivity of some visual receptors and the magnitude of change to some views, which could influence the predicted effects; and
 - xi. Potential exaggeration of the effectiveness of the proposed mitigation.

Conclusion

- 5.2 Taking account of the above, the conclusions of the LVA should not necessarily be taken at face value, without considering the points raised in this review.
- 5.3 In particular, the LVA methodology, and the tolerances of judgment it permits, may have played down the potential severity of some effects, notably those on the most sensitive visual receptors within some of the closest-range views.
- 5.4 It is also noted that the relatively coarse-grained approach to the character assessment (based on the district-wide LCAs) may have caused the LVA to overlook smaller-scale variations in effects that could be meaningful at a local level.
- 5.5 The Parish Council are advised to form their own judgments about the acceptability of the proposals in landscape and visual terms. These judgments should be informed by the factual information in the LVA and elsewhere, by the matters raised in this review, and by their own perception of the potential impacts and the effectiveness of the mitigation, within the policy framework provided by the Neighbourhood Plan.

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