

**Proposed Residential Development on
Land between Houghton Grange and The How**

Houghton Road, Houghton
Application Ref: 23/00627/OUT

**REVIEW OF APPLICANT'S
REVISED LVA**

on behalf of

Houghton and Wyton Parish Council

October 2024

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EXECUTIVE SUMMARY

1. This report, issued on behalf of Houghton & Wyton Parish Council, comprises a review of the applicant's Revised Landscape and Visual Appraisal (LVA) issued in September 2024.
2. It assesses the degree to which the Revised LVA has responded to the concerns raised in the First LVA Review carried out in June 2023. It also comments on any implications for separation between the village and St. Ives, which is a key concern of the Council and the subject of a separate report issued at the same time as the First LVA Review.
3. Of the ten concerns raised in the First LVA Review, three have been fully addressed. These relate to viewpoints, winter views and the extent of the zone of theoretical visibility (ZTV). Three have been partially addressed, and the remaining four have received no response.
4. As a result, concerns remain in relation to the following:
 - The value of the landscape, particularly with reference to local conservation areas and the highly sensitive Great Ouse Valley;
 - The LVA's focus on published character areas, at the expense of landscape components and perceptual attributes such as pastoral fields and openness;
 - Unexplained variations in the sensitivity of visual receptors; and
 - The site's contribution to local character and to separation between the settlements.
5. As a result, the proposed development would increase the actual and perceived sense of coalescence between Houghton & Wyton and St. Ives.
6. In addition, the Revised LVA does not report the effects of the latest proposal, and therefore may not provide a reliable basis for determination.
7. For these reasons, this review underpins the Parish Council's objection to the application, and District Councillors are urged to take it into account.

1. Introduction

- 1.1 Peter Radmall Associates (PRA) were commissioned by Houghton and Wyton Parish Council in June 2023 to consider 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). This took the form of a review of the landscape and visual appraisal (LVA) issued by AECOM in March 2023. I refer to these as the **2023 LVA** and the **First LVA Review**.
- 1.2 At the same time (June 2023), I produced a **Separation Report**, which considered the Implications for Separation between Houghton and St Ives, one of the key concerns of the Parish Council.
- 1.3 In response to comments from Huntingdonshire District Council (HDC) and other consultees, together with changes to the scheme parameters and some policy and published character references, a revised LVA was issued in September 2024 (**the 2024 LVA**).
- 1.4 This document reviews the 2024 LVA, advises on whether the areas of potential concern identified in the first LVA review have been addressed, and comments on the degree of reliance that can be placed upon it. I refer to it as the **Second LVA Review**.
- 1.5 This review has been based on a desktop study only – as agreed with the Parish Council, a site visit to the two additional viewpoints addressed in the 2024 LVA has not been considered necessary. The same limitations apply as for the First LVA Review, which are as follows:
 - It 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;
 - It has not included a detailed technical audit of the photographic and visualization material, which has been taken as read;
 - It relies on the original fieldwork, which was confined to publicly-accessible locations, and visits to selected viewpoints;
 - It 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. Response to First LVA Review Concerns

2.1 The First LVA Review assessed the 2023 LVA against a checklist of compliance with good practice, from which it identified a number of matters of potential concern. These may be summarized as follows:

- 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 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 may be questioned – 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 rather than subject to a technical audit; and
- ix. The sensitivity of some visual receptors appears to have been understated.

2.2 In addition, the Visual Assessment part of the review raised a number of subsidiary matters such as the ZTV and viewpoints. I have therefore added these to produce a consolidated list of matters against which to review the 2024 LVA.

2.3 The Second LVA Review is reported in the remainder of this section. For each matter of concern, explanatory text from the First LVA Review is provided, followed by a comment on the completeness of the response provided in the 2024 LVA, using the following descriptive scale:

- FULL: The matter has been fully addressed;
- NONE: No explicit response has been provided; or

- PARTIAL: Whilst some response has been provided, queries or uncertainties remain.
- i. Assessment of the Site and its Component/Perceptual Attributes as a Landscape Receptor

2.4 GLVIA3 advises 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].

2.5 The 2023 LVA did not follow this approach, identifying only the district-wide landscape character areas (LCAs) as receptors. Whilst the 2024 LVA also considers the townscape character areas (CAs) within St. Ives, it fails to consider individual landscape components and perceptual factors (e.g. pastoral land, openness). As a result, the 2024 LVA perpetuates this omission. Response to First LVA Review: **NONE**.

- ii. The site’s representativeness of/contribution to the published LCAs has not been assessed

2.6 The 2023 LVA included no explicit consideration of how the site or its component attributes may be representative of, or contribute to, the key characteristics of the LCAs. It was therefore difficult to understand how it had arrived at its assessment of effects on them.

2.7 The 2024 LVA has updated the baseline LCAs in accordance with the Huntingdonshire Landscape and Townscape SPD, 2022, and includes new descriptions of the relevant St. Ives character areas [Ref 2024 LVA 5.2.3.2].

2.8 The site is located within the Western Periphery (Townscape) Character Area, and the Great Ouse Valley LCA, which are assessed as being of Medium and High sensitivity respectively. There is still, however, no explicit reference to the degree to which the characteristics of the site contribute to/detract from this CA/LCA, and therefore to how the development’s impact on them has been derived. Response to First LVA Review: **PARTIAL**.

- iii. The conservation areas adjoining the site (and their component sub-areas) have not been identified as landscape receptors

2.9 Whilst conservation areas are primarily heritage designations, they often have landscape (or townscape) implications, particularly where they may include greenfield land and/or possess a wider setting (which is the case here). Their conservation status suggests that they should be regarded as being of high landscape/townscape sensitivity.

- 2.10 The First LVA review noted 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 2023 LVA did not assess whether there would be any effects on the character or setting of either CA.
- 2.11 The 2024 LVA also contains no such assessment (or cross-reference to a Heritage Statement or similar). However, effects on these CAs, and their settings, are reported in the Cultural Heritage Desk-Based Assessment (DBA, AECOM, December 2021). Whilst it is reasonable that a parallel assessment within the LVA has not been provided, an explicit reference to the DBA – and in particular to how it has influenced landscape value – would have been useful. Response to First LVA Review: **NONE**.
- iv. There has been no explicit consideration of whether the site may form part of a valued landscape¹
- 2.12 The First LVIA Review pointed out that the south-western part of the site falls within both the Houghton Grange Grassland County Wildlife Site and the Houghton and Wyton Conservation Area. Its setting to the south extends across the Ouse valley, which is clearly a landscape of some scenic, biodiversity, recreational and heritage value.
- 2.13 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, now National Landscape). 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.
- 2.14 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 may contribute to that value. This possibility was not acknowledged in the 2023 LVA, although the Great Ouse Valley LCA is considered to be of high sensitivity. Such an acknowledgement is also absent from the 2024 LVA. Response to First LVA Review: **NONE**.
- v. The assessment views do not appear to have been agreed with the LPA
- 2.15 The 2024 LVA confirms that this agreement was secured in December 2020 [Ref 2024 LVA 6.1.1]. Response to First LVA Review: **FULL**.
- vi. In view of the Parish Council’s concerns about implications for the perceived separation between Houghton and St Ives, additional

¹ As per NPPF180(a)

viewpoints looking towards the site from both directions along Houghton Road would have been helpful

2.16 No additional views in this location have been added for the 2024 LVA. However, additional viewpoints requested by HDC (3a and 18) have been added, together with two longer-distance views from the south-east (21/22). Response to First LVA Review: **PARTIAL**.

vii. The location/representativeness of some of the viewpoints may be questioned. The Parish Council is of the opinion that longer-distance views from the south/south-east should have been considered. Additional closer-range viewpoints along Houghton Road and the Ouse Valley Way should also have been considered.

2.17 The request for longer-distance views from the south/south-east has been addressed in the 2024 LVA by the addition of VPs 21/22. No additional short-range views have been provided. Response to First LVA Review: **PARTIAL**.

viii. The 2km radius for the ZTV is inadequate for buildings 10m in height (e.g. solar arrays are typically 3-4m in height, but their ZTVs typically extend to 5km)

2.18 The ZTV has been extended to 5km for the 2024 LVA [Ref 2024 LVA Figures 4a/5a]. Response to First LVA Review: **FULL**.

ix. Winter and summer photography should have been provided for each viewpoint

2.19 The First LVA Review commented that, whilst the 2023 LVA allowed for variations in effects between summer and winter conditions, these were not evident in the photography and visualizations, which only showed the former (i.e. the least-visibility scenario). A winter version of the material would have provided substantially greater confidence in its reliability.

2.20 The 2024 LVA has responded as follows [Ref 2024 LVA 1.3]: "Winter photography was captured in January 2024 from the 20 viewpoints. This was as closely matched to the summer photography as practical. Baseline summer and winter photography have both been accurately annotated to show the horizontal site extents in the views, based on the 3d model of the main development area. This has been reviewed and updated for the summer photography, which was previously annotated based on approximate development extents." Response to First LVA Review: **FULL**.

x. Discrepancies in sensitivity between the same categories of visual receptor are not readily explicable

2.21 The First LVA Review commented that, 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...*”.

- 2.22 There has been no change to 2024 LVA Appendix A: Methodology in relation to the sensitivity of visual receptors. As a result, potential concerns over the reliability of the 2024 LVA remain in relation to visual impacts. Response to First LVA Review: **NONE**.

Summary of LVA Response

- 2.23 Of the ten matters highlighted in the First Review, three have received a full response in the 2024 LVA, four have received no explicit response, and the remaining three have received a partial response. Those for which a full response has been provided relate to the agreement of viewpoint locations, the extension of the ZTV to 5km and the provision of summer/winter photography.
- 2.24 Two of the matters to which partial responses have been provided relate to the inclusion of additional viewpoints in the 2024 LVA. These comprise the two viewpoints requested by HDC, and two longer-distance viewpoints to the south/south-east that reflect the extended ZTV. No additional close-range viewpoints, as requested by the Parish Council, have been provided.
- 2.25 Notably, there has been no explicit response to the matters relating to the assessment of site character and its component attributes, its contribution to the published LCAs/CAs, the Conservation Areas or sensitive visual receptors. Neither has any explanation been provided as to the reason for this absence. It seems likely, however, that the consultation comments from HDC have been prioritised, together with more obviously technical matters, whilst those which challenge the judgmental basis for the LVA have remained unanswered.

3. Implications for the Reliability of the 2024 LVA

- 3.1 My advice to the Parish Council from the First Review was that *"...the conclusions of the [2023] LVA should not necessarily be taken at face value, without considering the points raised in this review"*.
- 3.2 In particular, I advised that *"...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"*.
- 3.3 I also noted that *"...the relatively coarse-grained approach to the character assessment (based on the district-wide LCAs) may have caused the [2023] LVA to overlook smaller-scale variations in effects that could be meaningful at a local level."*
- 3.4 The 2024 LVA has improved its technical reliability in relation to the ZTV, seasonal photography, agreement of viewpoints, and additional views and (townscape) character areas. However, questions remain over the judgmental aspects of its methodology, particularly in relation to representative landscape features, landscape value and receptor sensitivity. Since there has been no fundamental change to methodology, the original concerns remain unanswered.
- 3.5 One final comment should be made about the reliability of the 2024 LVA. Section 1.3 of the 2024 LVA, bullet 1, states the following:
- The Parameter Plan has been updated. This Revised LVA considers the parameter plan shown in Appendix B (dated 06/11/23). The plan has been amended since (Rev 06, dated 08/08/2024), which includes a greater set-back of development from Houghton Road, with significantly more tree planting between built development and Houghton Road than is considered in this Revised LVA*
- 3.6 For reference purposes, the parameter plan from revised LVA Appendix B is reproduced in **Figure 3.1**. The original version should be accessed for greater legibility, reference to the key etc.
- 3.7 For comparison, the parameter plan from the 2024 LVA review is shown in **Figure 3.2**.

Figure 3.1: Parameter Plan from 2024 LVA Appendix B



Figure 3.2: Parameter Plan from 2023 LVA Review



- 3.8 Even allowing for slight disparities in scale (due to both images having been copied as screen-shots), material differences between them are not readily visible. Whilst the proposed development area has not changed, the most obvious difference of relevance to this discussion is the introduction of a peripheral zone within which the height parameters have been adjusted downwards (from 10m to 8.5m), in response to comments from HDC's urban design officer.
- 3.9 However, as the text from the 2024 LVA 1.3 points out, the parameter plan shown in Figure 3.1 is not the latest version. This plan was updated in August 2024 to show a greater offset of development from Houghton Road, together with more tree planting. These changes are not reflected in the 2024 LVA, which therefore may not provide the complete information required before the application can be reliably determined.

4. Implications for Separation between Houghton + Wyton and St. Ives

4.1 As noted above, in June 2023, alongside my First LVA Review, I produced a report on the development's "*Implications for Separation between Houghton and St. Ives*". The Summary and Conclusion of this report was as follows:

- The application site lies outside the settlement boundary of Houghton & Wyton, and represents the last buffer of open land separating the village from St. Ives to the south of Houghton Road.
- The majority of the site retains a greenfield character that reinforces its role as part of the open countryside.
- Despite the presence of the access road into Houghton Grange, the site remains demonstrably open (and has become increasingly so with recent demolition of the poultry sheds).
- The importance of the separating function performed by the site has been accentuated by completion of the Garner Drive development to the north of Houghton Road.
- This has created a "pinch-point" between the settlement edges of Houghton & Wyton and St. Ives in the vicinity of the water-tower, beyond which further separation is provided by the arable land to the north-west.
- The openness of the site can be appreciated in the sequence of views along Houghton Road, in contrast to the built-up edge of St. Ives to the north and the vegetated frontages to Houghton Grange and The Spires.
- This openness is also seen in views from the southern part of the site, in which its countryside character and its contribution to the undeveloped skyline are evident.
- Although development would occupy only c22.5% of the site, it would be concentrated on its north-western corner, adjacent to Houghton Road.
- As a result, the width of the east/west green gap between Houghton & Wyton and St. Ives would be reduced by about two-thirds, to a corridor of open land c100-150m wide adjacent to The Spires.
- The visual influence of the development would extend across the remaining open parts of the site, along the Houghton Road corridor, and across the arable land to the north-west.

- The visualizations in the 2023 LVA confirm that it would have a significantly obstructive and enclosing effect on views from Houghton Road, and would introduce a developed skyline into views from the southern part of the site.
- The resulting loss of openness would increase the actual and perceived sense of coalescence between Houghton & Wyton and St. Ives, such that it would no longer be clear where one settlement ends and the other begins.
- This is clearly contrary to NP Policy 3, and is also at variance with the schematic principles illustrated in Policy S11, which envisaged that development on this site would not extend as far to the east, or as close to the main road, and would occupy a smaller footprint.
- The development would also encroach into open countryside and have a further urbanising influence on the locality, contrary to NP Policy 1, Local Plan policy 10 and NPPF 174(b)².
- The Parish Council's concerns about the implications for coalescence and further urbanization are therefore considered to be justified.

4.2 Having reviewed the 2024 LVA, and compared their respective parameter plans, I consider those conclusions to remain fundamentally valid. Unsurprisingly, the 2024 LVA makes no explicit reference to loss of openness or to an increased (actual or perceived) sense of coalescence between Houghton and St. Ives.

4.3 However, the 2024 LVA does assess the development's impact on the St. Ives urban character areas (CAs), of which the Western Periphery CA - in which the site is located – is most relevant. This is shown as the green-shaded area on **Figure 4.1**.

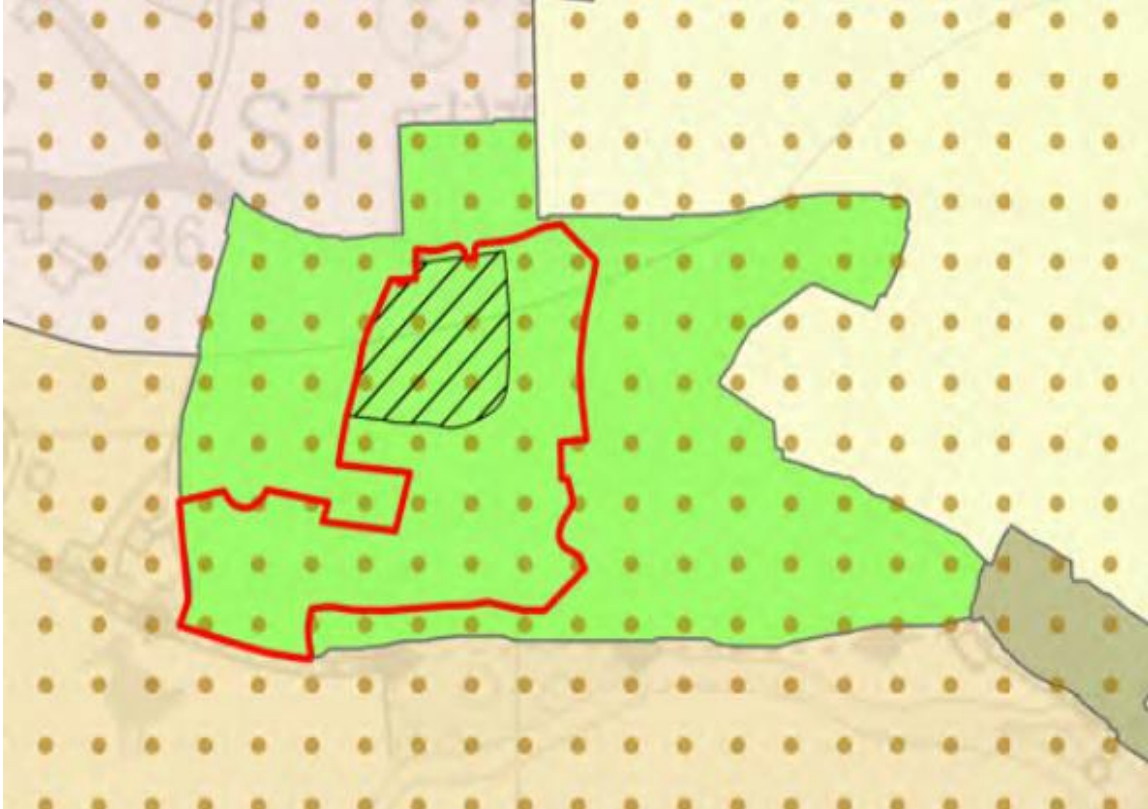
4.4 As its name suggests, this CA forms the western fringe of the town, comprising a combination of built-up areas (Garnier Drive and The Spires), mature tree belts and open grassland. The area's association with the Great Ouse Valley, the Thicket Path and the Houghton and Wyton conservation area is acknowledged in the revised LVA to be of "increased local value".

4.5 Overall, the Western Periphery CA is considered in the revised LVA to be of Medium value and Low susceptibility, giving rise to Medium sensitivity [Ref 2024 LVA, Table 5.2.1-1]. As can be seen from Figure 4.1, the proposed scheme would introduce a cluster of built development up to 10m high onto the central/northern part of the site, which is currently open land. This is

² Now NPPF180(b)

considered in the 2024 LVA to amount to a Low magnitude of change, which in combination with Medium sensitivity gives rise to a Minor Adverse effect at Year 1 [Ref 2024 LVA 9.1.2.3].

Figure 4.1: Relationship to Western Periphery Character Area



Extracted from 2024 LVA Appendix B, Figure 3: Published Character Areas

- 4.6 In my opinion, the predicted Minor Adverse effect under-states both the susceptibility to change of the green space within this CA, and the magnitude of impact represented by the further encroachment of built development into it. Comparison of Figures 3.1 and 3.2 indicates that there has been no material reduction in this degree of encroachment as the masterplan has evolved, which cannot reasonably be described as a “slight alteration” to the CA [Ref 2024 LVA 9.1.2.1].
- 4.7 The 2024 LVA refers to the retention of a “green wedge of open space” between the development and The Spires. As pointed out in the conclusion to the original LVA review, however, the width of the east/west green gap between Houghton & Wyton and St. Ives (which falls within this CA) would be reduced by about two-thirds. The peripheral and transitional character of the CA – and thereby its contribution to separation between the settlements – would be further eroded by the urbanizing effect of the proposal.

5. Summary

- 5.1 This review of the Revised LVA concludes that, of the ten concerns raised in the First LVA Review, three have been fully addressed. These relate to viewpoints, winter views and the extent of the zone of theoretical visibility (ZTV). Three more have been partially addressed, and the remaining four have received no response.
- 5.2 Concerns remain in particular that:
- The value of the landscape, particularly with reference to local conservation areas and the highly sensitive Great Ouse Valley, may have been under-stated;
 - The LVA's focus on published character areas has been at the expense of landscape components and perceptual attributes such as pastoral fields and openness;
 - There are unexplained variations in the sensitivity of visual receptors; and
 - The site's contribution to local character and to separation between the village and St. Ives has not been recognized.
- 5.3 As a result, the LVA may have understated some of the predicted effects, including the degree to which the development would increase the actual and perceived sense of coalescence between Houghton & Wyton and St. Ives.
- 5.4 In addition, the Revised LVA does not report the effects of the latest proposal, and therefore may not provide a wholly reliable basis for determination.
- 5.5 For these reasons, this review underpins the Parish Council's objection to the application, and District Councillors are urged to take it into account.