

Appendix E – LDA CONSULTATION

L D A DESIGN

Colne Valley MSA

L VIA Review on Behalf of Buckinghamshire Council
January 2022

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1.0 Introduction

1.1 Brief and Scope of Review

- 1.1.1. LDA Design Consulting Ltd (LDA) are a nation-wide multidisciplinary practice of masterplanners, planners and landscape architects. LDA was commissioned in mid-October 2021 by the Planning, Growth & Sustainability Directorate of Buckinghamshire Council, (BC) to review two inter-related Landscape and Visual Impact Assessments (LVIAs) which have been submitted in support of two Planning Applications relating to the same proposed development site (the Applications), as follows.
- The mining and minerals application, which, at the time of writing, is being considered by BC under reference CM/0036/21 (the Minerals Application/ the Minerals Development)¹; and
 - The outline application for the Colne Valley Motorway Services Area (MSA), which at the time of writing, is being considered by BC under planning reference PL/20/4332/OA (the MSA Application/ the MSA Development)².
- 1.1.2. It is important to note that the MSA Application relies on the Minerals Application as a pre-requisite of its subsequent implementation.
- 1.1.3. The Commission brief required a professional and objective technical review of the two aforementioned supporting LVIAs in the light of current good practice (the Review). The Review, which was partly desk-based and partly field-based, was subsequently carried out during mid-late October 2021 by two Chartered Landscape Architects with appropriate experience in landscape planning and assessment; Paul Lishman CMLI and James Truscott CMLI.
- It should be noted that LDA Design provided similar services for the recently submitted Warren Farm MSA Application and acted as Expert Witness at the Appeal.
- 1.1.4. The Review comments are based on a technical evaluation of the submitted Minerals Application LVIA (the Minerals LVIA); contained in Chapter 5 of the Minerals Application Environmental Statement (ES)³ together with associated Appendices; and the MSA Application LVIA (the MSA LVIA); contained in Volume 1, Chapter 5 of the MSA Application ES together with associated Appendices all as updated/amended⁴; and an appraisal of the main landscape and visual issues arising. Because of their broad similarity and close inter-relationship, the two LVIAs have been reviewed concurrently.
- 1.1.5. The LVIAs are supported by a range of plans including a Zone of Theoretical Visibility, photography from 11 viewpoints and verified photomontage visualisations at two of these

¹ <https://publicaccess.bucksec.gov.uk/online-applications/>

² <https://publicaccess.bucksec.gov.uk/online-applications/>

³ Colne Valley Services Mineral Application 5- Environmental Statement Main Report July 2021

⁴ Colne Valley Services 5- Environmental Statement Main Report Volume 1 December 2020

locations (Viewpoints 3 & 5) illustrating the scale of the proposed development (incorporating the maturing MSA Development mitigation planting at Year 1 and Year 10).

- 1.1.6. When reviewing the LVIA's, allowance was made on site for the fact that, being autumn, trees were in either full or partial leaf at the time and therefore not representative of the worst-case scenario (i.e., mid-winter when the existing deciduous trees' screening potential is reduced by lack of foliage). It was also noted that the LVIA visualisations and the assessment work were carried out at a similar time of year; however, it was stated that seasonal considerations had already been taken account of in the preparation of both LVIA's.
- 1.1.7. In addition to the Application documents individually referenced in the text, the following documents were also referred to during the course of this Review.
- Landscape Institute (LI) Guidance on reviewing LVIA's⁵;
 - LI Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3)⁶; and
 - LI Guidance on Visual Representation of Development Proposals.⁷
- 1.1.8. This Review covers the following landscape and visual amenity topics;
- scoping, and pre-application consultation by the Applicant with BC on LVIA issues;
 - method of approach with regard to the inter-relationship between the Minerals LVIA and the MSA LVIA and their respective scopes;
 - methodology issues including appropriateness, comprehensiveness, and compliance with guidance;
 - landscape and visual baseline descriptions;
 - landscape and visual mitigation proposals;
 - LVIA assessment findings; and
 - clarity of presentation.

This is followed by overall conclusions and recommendations.

⁵ Reviewing Landscape and Visual Impact Assessments (LVIA's) and Landscape and Visual Appraisals (LVAs) Landscape Institute Technical Guidance Note 1/20 (10th Jan 2020)

⁶ Guidelines for Landscape and Visual Impact Assessment, Third Edition, 2013 ; LI/IEMA; Routledge

⁷ Landscape Institute, 2019. Visual Representation of Development Proposals. Technical Guidance Note 06/19

1.2. LVIA Scoping

- 1.2.1. A Scoping Report was issued to BC in November 2020 by the Applicant's Consultants (AXIS)⁸ in respect of the MSA Development. It is understood that no Scoping Opinion had been received from BC at the time of writing the MSA ES and hence the methodology is based upon that submitted at Scoping⁹.
- 1.2.2. As regards the Minerals Development, there appears to be no reference to this in the MSA Scoping Report referred to above; nor does there appear to have been a Scoping Report produced specifically in support of the Minerals Application.
- 1.2.3. Having reviewed the landscape and visual section of the MSA Scoping Report, this does appear to accord with the methodology subsequently adopted by the MSA LVIA.

1.3. Pre-Application Consultation

- 1.3.1. Para.5.2.14 of the Minerals LVIA states that "...consultation was carried out with Buckinghamshire Council as part of the pre-application submission made in June 2020 for the CVS scheme (MSA Development). A response to this was received in October 2020, which identified the need to produce a Zone of Theoretical Visibility diagram (ZTV) covering an approximately 5km radius around the CVS scheme Site. Figure 5.1a illustrates a ZTV for the CVS scheme extending over this radius."¹⁰
- 1.3.2. Having reviewed feedback from BC Planning staff in respect of the extent of the pre-application consultation, it appears that whilst the location of the short distance views was considered acceptable by BC, further work was requested in order to work with BC to review and agree a range of locations to be confirmed in the field, focusing on potential views/vistas from significant public roads, rights of way, open spaces, designated landscapes and residential areas. BC also flagged up that part of the site sits on a gradient and may be prominent in longer range views and suggested that the LVIA should consider potential viewpoints at least 3km and up to 5km from the edges of the site.
- 1.3.3. As stated in both LVIAs, and quoted above, an additional 5km ZTV and one additional viewpoint (11) was the apparent outcome of this request. It does not appear that any other viewpoints were proposed and / or amended, however, it appears from reviewing the LVIAs that AXIS's timescale constraints may have contributed to lack of further engagement (see 1.3.4 below).
- 1.3.4. BC also suggested that the MSA development as a whole should be considered for inclusion in the ZTV. This included not just the buildings, but the petrol filling station, the car parking, hotel, access road/bridge and potential gantry and road signage and lighting. In the event, the ZTV for both the Minerals LVIA and the MSA LVIA only illustrates the theoretical visibility of the main amenity building and HGVs entering and leaving the site.

⁸ Colne Valley Services Environmental Scoping Report November 2020 Draft V1

⁹ Colne Valley Services 5-6 Environmental Statement Main Report Volume 1 December 2020 para. 5.2.12

¹⁰ Colne Valley Services Mineral Application 5- Environmental Statement Main Report July 2021 p.5-7

Whilst we agree with BC that one or two other key features would have been a useful addition to the ZTV and assist in the assessment process, we note the ZTV study is a tool for guiding further desk / field study and complex ZTVs can lead to confusion in the graphic presentation.

- 1.3.5. No further pre-application discussions were sought by the Applicant following the issuing of a letter by BC expressing the foregoing concerns although again, AXIS's timescale constraints may have contributed to this, as they go on to state that "...the proposed scope of the LVIA was set out in the Scoping Report submitted to Buckinghamshire Council in November 2020 (refer to Appendix 2-1)¹¹. At the time of writing, a Scoping Opinion had not yet been received from Buckinghamshire Council. As such, the LVIA has been undertaken in accordance with the scope proposed, and in accordance with pre-application consultation..."¹² (as described above).
- 1.3.6. Crucially however, no specific pre-application discussion appears to have taken place regarding the Minerals LVIA specifically, nor the approach to be taken in respect of the close inter-relationship between the two Applications and specifically the two LVIAs.

¹¹ Colne Valley Services Environmental Scoping Report November 2020 Draft V1

¹² Colne Valley Services 5-6 Environmental Statement Main Report Volume 1 December 2020 para. 5.2.12

2.0 Review of Approach and Methodology

2.1. Approach

- 2.1.1. In the Minerals LVIA the inter-relationship between the Minerals Application and the MSA Application and their associated LVIA's is explained as follows; *"...as set out in Chapter 4.0 of the (Minerals Application) Environmental Statement (ES), the Proposed Development for which full planning permission is being sought is the minerals extraction component of the wider Colne Valley Services (CVS) scheme (the MSA Development). If the CVS scheme is not consented, the mineral extraction (i.e. the Proposed Development) will not take place, irrespective of whether permission for the extraction is granted or not. As the mineral extraction is part of the CVS scheme it relies on the mitigation and restoration from the CVS scheme, and as such elements of the CVS outline application are referenced where necessary to provide a full understanding of the context of the Proposed Development."*
- 2.1.2. It continues *"...this ..LVIA is derived from the LVIA of the CVS scheme (as updated as part of the Regulation 25 Update Submission, June 2021). Whilst emphasis is placed upon those elements that comprise the Proposed Development, **some of the information included is concerned with the CVS scheme once operational and has limited or no applicability to the mineral extraction. Where this is the case, this is clearly stated**"*¹³ (emphasis added).
- 2.1.3. In 5.1.13 the Minerals LVIA further defines this approach ; *"...should outline consent for the proposed CVS scheme not be granted, then the mineral extraction (i.e. the Proposed Development) will not take place. The minerals extraction would occur entirely within the footprint of the CVS scheme (including the footprint temporary construction works for the CVS scheme). **As such, no specific restoration of the area affected by the Proposed Development is proposed. Rather the development of the CVS scheme, including associated on-site and off-site planting would comprise the restoration**"* (emphasis added)¹⁴.
- 2.1.4. In 5.2.13 the Minerals LVIA continues *"..."* as the Proposed Development would comprise part of the construction activity associated with the CVS scheme, it is clear that the scope of the CVS scheme encompasses the proposed minerals extraction.¹⁵
- 2.1.5. There are, however, in our opinion, a number of potential issues arising from this approach, as follows.
- The two Applications are for separate although closely inter-related developments on the same site but with a different range of potential landscape and visual effects and as such, it is considered that both the Minerals Development and the MSA Development should be assessed separately – which, by the virtue of preparing two separate LVIA's for two separate applications, would seem to be an agreed position with BC and the Applicant.
 - Since the MSA Development landscape mitigation proposals are assumed in the Minerals LVIA to be the ultimate restoration proposals for the Minerals

¹³ Colne Valley Services Minerals Application Environmental Statement Main Report July 2021 p.5-1

¹⁴ Op.cit p.5-3

¹⁵ Op.cit p.5-6

Development, the ZTV, visual assessment tables and landscape assessment tables for the Minerals Development in the Minerals LVIA appear to be identical to those presented in the MSA LVIA, despite potentially different landscape and visual effects arising.

- Furthermore, whilst there is a fairly detailed description of the envisaged minerals works in Chapter 4 of the Minerals ES, the usual convention of describing effects arising from “Construction” and “Operation” in the ES does not appear to have been followed. It would have been expected for a minerals development such as this, that what is referred to in the ES as “enabling” works in terms of construction of temporary and permanent accesses, temporary site compounds, stripping and stockpiling or removal of topsoil and overburden etc., would be assessed as “construction” effects and that the subsequent extraction of sand and gravel (only c.10% of which is to be retained on site for subsequent MSA works) would be assessed as “operation” effects. The MSA ES would then in turn consider the “Construction” effects of building the MSA and “Operation” effects of the completed scheme. Instead, the approach adopted has been to class the whole Minerals Development as part of the “construction” element of the eventual MSA Development on the same site.
- As a consequence of this approach, there is no specific landscape or visual assessment of any “construction” or “operation” period of the mineral workings themselves (as defined above), which are due to last about ten months in total according to the Minerals LVIA, in respect of either direct or indirect impacts and consequent effects and their significance.
- It is understood that the Minerals Application procedurally had to be submitted separately to the MSA Application, and that it is being treated by the Applicants as a pre-requisite for the MSA Development and that it would only proceed if both Applications were consented. Nevertheless, with this approach there is a potential but realistic scenario, whereby if both consents were granted and the mineral extraction went ahead but then work on the MSA was subsequently delayed for a considerable period of time, or worse still, never progressed due to unforeseen economic, commercial, or other reasons. In this case, as things currently stand, the worked gravel pit would lie in an unrestored state for an indefinite period of time and perhaps permanently. This is clearly not a desirable landscape outcome, and it is one which has not been anticipated by the Minerals ES and which for the same reason has not been assessed in the Minerals LVIA.
- It would be preferable therefore in our opinion, that the Minerals ES considered the specific effects of construction / operation associated within the minerals activity, separately from the construction / operation associated with the MSA; and that consideration is given to a potential scenario in which the MSA does not come forward or is delayed. This could include a potential post-mineral extraction restoration plan, which could be put in place as a contingency in the eventuality the MSA does not come forward.
- Finally, and contrary to the italicised sentence quoted above in 2.1.2, it is not always clear to the reader of the Minerals LVIA which elements relate to the

Proposed Minerals Development, and which relate to the Proposed MSA Development (or CVS Scheme as the Minerals LVIA refers to it).

2.1.6. Other identified issues with the overall approach include:

- There is no consideration of changes to typography (in so far as it relates to site fabric) in the Minerals LVIA. Effects on site fabric are limited to vegetation loss only.
- There is no detailed assessment for the construction period of the MSA LVIA. While the construction activity is described in some detail, the effects themselves are not quantified.

2.1.7. The MSA LVIA also does not make clear judgements on the operational residual landscape and visual effects. Section 5.7 describes how the proposed landscape strategy would help integrate the proposed development and screen views, but it is not clear how effects vary over time (which is normally considered at Year 1 and Year 10 or 15). This is despite the viewpoint photomontages being at Year 1 and Year 10.

2.2. Methodology

2.2.1. The LVIA methodology used is the same for the Minerals LVIA and the MSA LVIA. In both cases the methodology appears in Appendices 5-1 of their respective ESs (Volume 2 in respect of the MSA LVIA). The methodologies state that they are informed by guidance contained within the Guidelines for Landscape and Visual Impact Assessment (The Landscape Institute and Institute of Environmental Assessment, 3rd Edition, 2013) or GLVIA3, and it is agreed that they do indeed generally follow this guidance and are considered to be generally robust and together with the choice of study area extent, are considered to be appropriate for the scale and nature of both the Minerals Development and the MSA Development.

2.2.2. However, there are concerns regarding the approach to visual **value**, which, together with susceptibility, forms one of the two elements to be considered when evaluating visual receptor sensitivity.

2.2.3. In para. 3.11 the methodology states that “...in accordance with paragraph 6.37 of the GLVIA when considering the value of a view experienced, this should take account of:

- *Recognition of the value attached to particular views, for example in relation to heritage assets or through planning designations;*
- *Indicators of the value attached to views by visitors, for example through appearances in guidebooks or on tourist maps, provision of facilities for their enjoyment and references to them in literature or art”.*

2.2.4. Accordingly, in the evaluation of the value element of visual sensitivity set out in Appendix 5-5 of the Minerals LVIA and Updated Appendix 5-5 of the MSA LVIA, the Assessor considers the presence of landscape designations, heritage, nature conservation

and viewpoints promoted for recognised scenic value. However, in LVIA methodology para. 3.13 it goes on to state that "...the assessment of value is made on the same basis as the assessment of susceptibility to change.", This would seem to indicate that the susceptibility criteria have also been used for this evaluation of value, which is clearly inconsistent with GLVIA and does not align with the tables set out in Appendix 5-5. Therefore, greater clarity on how susceptibility and value have been used to inform visual sensitivity would be helpful.

- 2.2.5. This lack of clarity regarding visual susceptibility / value also seems to have continued into some of the judgements. For example, it is stated that "*people tend to value the views from their properties*"; however even when it does state this, the value does not rise above Medium. The level of Medium-High seems to be reserved in a number of cases to receptors on public footpaths regardless of the prevailing context. For this reason, it is considered that some evaluations of visual sensitivity, may be understated or overstated, depending on location. This is reviewed in more detail below in section 4.0.
- 2.2.6. The existing site photography and viewpoint photomontages from VPs 3 and 5 appear to have been carried out in line with current good practice guidance as described in the methodology in Appendix 5-2 in both LVIA cases (Volume 2 in MSA ES) and with reference both to GLVIA3 and Landscape Institute (2019), Visual Representation of Development Proposals Technical Guidance Note 06/19. This is considered to be an acceptable approach.
- 2.2.7. However additional photomontages would have been useful given the nature and scale of development, and it is not clear whether or which VPs were discussed with BC as potential candidates for such visualisations. In ES Appendix 5-2 (Visualisation Methodology) the assumed heights of the proposed trees to be planted (ranging from transplants to extra-heavy standard and (assumed) semi-mature forms at years 1 and 10 are stated and appear reasonable as averages; although it should be noted that heights at 10 years will vary according to species and site conditions and this caveat does not appear in the methodology. It should also be noted that some of the peripheral mitigation planting is to be on linear mounds (ref. cross sections in the Design and Access Statement (DAS) Section 4.0.) and it is not clear whether this has been taken account of in the photomontages.
- 2.2.8. Viewpoints 2 and 3 on Bangors Road North represent residential receptors, road users and pedestrians at ground level but it should be borne in mind when reviewing the assessment that a number of the houses are two storey and receptors on upper floors can in places see over the foreground hedgerows (see Plate 1; View West from Bridleway). It is not apparent if this has been taken account of in the assessment of these two Viewpoints.



Plate 1; View West from Bridleway; tops of some two-storey houses in Bangors Road North, Iver Heath, can obtain partial views over foreground hedgerow

3.0 Review of Landscape and Visual Baseline Descriptions

3.1 Introduction

- 3.1.1. The Landscape and Visual Baseline for the Minerals LVIA and the MSA LVIA are identical, and the review below applies to both. However, following on from the observations made in Section 1.0, there is the potential for the MSA LVIA baseline to be modified to include a description of the excavated area which would be left after the sand and gravel extraction resulting from the Minerals Development.

3.2 Site Description

- 3.2.1. The site and its environs are described generally comprehensively and accurately (except the high point, with reference to the 1:25,000 OS map, should probably read 55.5m AOD rather than 54.5m AOD). From this point, Chandlers Hill, to the east of VP5, (see photograph, Plate 2, Chandlers Hill) broad views are obtained of the development site plateau just to the north.



Plate 2, Chandlers Hill looking north; development site in mid-ground; tops of motorway/ electricity infrastructure in background

- 3.2.2. One other exception is that the description appears to omit an overview of local drainage. This is important, as the northern part of the site slopes down into a pronounced, if relatively shallow valley, largely hidden by topography and hedgerows in views from the west and south and emphasised by a linear copse which screens the site from the north and lies just outside the site on the north side of the valley, which is just over 10m deep at its

most easterly point. Its un-named stream, which rises north of Denham Road (A412) flows out of the west part of the site under the adjacent M25 motorway (see photograph, Plate 3, Bridleway adjacent to Site) before joining the Alder Bourne, a tributary of the River Colne, to the east of the motorway. The river itself then passes under the M25 just south of the site from east to west and is joined here by another small un-named tributary which drains the steeply sloping south-east site corner.



Plate 3, Bridleway adjacent to Site, looking west over the centre of development location towards shallow tributary valley and adjacent copse.

3.3. Landscape Baseline

- 3.3.1. The description of landscape designations, landscape character assessments and other landscape studies generally appears to be comprehensive and well-researched.
- 3.3.2. The approach taken forward to assessment is that, *"...on the basis that the (Colne Valley Character Areas, or) CVCAs are mapped at a finer grain than the South Buckinghamshire (Landscape Character Areas, or) LCAs, it is these that form the principal baseline against which effects on landscape character have been assessed. However, all conclusions regarding effects have also been informed by the contents of the District (Landscape Character) Study...in relation to the other character areas within the Study Area, the presence of the Proposed Development would have no appreciable influence upon their character, due to the general lack of visibility, and no further consideration is given."* This is considered to be an acceptable approach.
- 3.3.3. As discussed above however, the MSA Landscape Assessment could amend its baseline description of the site and environs to include for and take account of, the worked-out sand

and gravel pit development which would be the residual state of the Minerals Development.

3.4. Visual Baseline

3.4.1. For comments regarding the ZTV, please see above, in Section 1.2.

3.4.2. With regard to the selection of Viewpoints (VPs), the LVIA paraphrases GLVIA para. 6.19 as follows; "...viewpoints can fall into three categories, as set out in the GLVIA:

- *Representative viewpoints (which represent the experience of different types of receptors in the vicinity);*
- *Specific viewpoints (a particular view, for example a well-known beauty spot);*
- *Illustrative viewpoints (which illustrate a particular effect / issue, which may include limited / lack of visibility)."*

On visiting the site environs, the following observations are made:

- VPs 1 (Denham Road) and 8 (Denham Road Bridge) seem initially of limited usefulness as they have no, or extremely limited, views of any element of either the Mineral Development or the MSA Development; however, they do fall under the third bulletpoint heading above and for this reason are useful context.
- Similarly, VP 6 (Field north of White Cottage), as a non-public location, away from the bridleway, with currently limited views, seems an unusual choice until it is made clear in the LVIA that this is representative of views from White Cottage, a key and sensitive receptor location, the views from which would be opened up as a result of both Developments removing mid-ground trees.
- VP 9, on the Slough Road, is currently a view of a hedgerow opposite but again this would change if the proposed new site access was constructed.
- Whilst it is acknowledged that the bridleway would be relocated to the west of the site, nevertheless it is felt that a viewpoint on the east side of the site is lacking; perhaps to the north of where the farm overbridge (to be retained as a pedestrian access) emerges from the top of the M25 cutting on the west side might have been a useful location as this would be on the periphery but close to the centre of both Developments (see Plate 3 above).

4.0 Review of Landscape and Visual Mitigation and Assessments

4.1 Landscape and Visual Mitigation; Minerals Development

- 4.1.1. As discussed above in detail in Section 2.1 above, the approach to mitigation taken by the Minerals LVIA relies almost entirely on the mitigation provided by the separate MSA Application. As described in the MSA LVIA and summarised below in 4.2 this assumes that this will follow on directly from the Minerals Development, which may or may not be the case in reality.
- 4.1.2. The exception is the proposed implementation of a Construction Environmental Management Plan (CEMP) which would apply specifically to the Minerals Development to mitigate construction-related landscape and other effects,¹⁶¹⁷ and which appears appropriate in principle.

4.2 Landscape and Visual Mitigation; MSA Development

- 4.2.1. During the “construction” stage of the MSA Development the implementation of a CEMP is proposed, which would govern construction activities, and which would include measures to protect retained vegetation, protect soil materials, and control construction lighting. This appears to be appropriate.
- 4.2.2. A series of mitigation proposals have also been incorporated into the design, with the intention of ameliorating potential adverse landscape and visual effects during the “operation” stage. These are outlined in para. 5.4.1 of the MSA LVIA and the Landscape Design proposals are described and illustrated in some more detail in the supporting Design and Access Statement.¹⁸ The proposed MSA outline landscape design and landscape / visual mitigation measures appear to have been sensitively designed and seem appropriate to the site and environs.
- 4.2.3. These main mitigation features are as follows.
- New native woodland planting located around the perimeter of the Site for screening, tying into the existing landscape character and as compensatory tree planting;
 - Low mounding along the south-western perimeter of the Site, to increase the effective height of the new woodland planting when viewed from Iver Heath;
 - New planting north of New Cottage, to screen views of the proposed slip roads from this property;
 - New wildflower grassland areas, and wetland vegetation, for biodiversity;
 - Off-site habitat enhancements, comprising further wildflower grassland and woodland, enhancing biodiversity and local landscape character;

¹⁶ Colne Valley Services; Mineral Application 4-4 Environmental Statement Main Report July 2021 Paras.4.26-4.30

¹⁷ Op.cit Paras 5.4.2-5.4.3

¹⁸ Colne Valley Services; Design and Access Statement; pps.45-55 incl.

- A new pedestrian route would be provided on the former farm access bridge across the M25, linking Iver Heath with the Iver Environment Centre; and
- A well-designed lighting scheme, which would minimise potential adverse night-time effects.

4.3. Minerals LVIA Findings; Review

4.3.1. The Minerals LVIA and its findings appear to be identical to those of the MSA LVIA.

4.3.2. As referred to above in Section 2.0, in our opinion the Minerals ES should consider the specific effects of construction / operation associated within the minerals activity, separately from the construction / operation associated with the MSA.

4.4. MSA LVIA Findings; Review

4.4.1. Section 5.7 of the updated/ amended MSA ES summarises the residual effects of the MSA LVIA and highlights the main differences between the original and amended designs.³⁹

4.4.2. The MSA LVIA concludes that *"...the originally submitted (MSA) scheme would give rise to localised significant landscape and visual effects. This would continue to be the case in relation to the revised (MSA) scheme, but the extent and duration of these significant effects would reduce...the effects of the increased amount of new woodland planting would be to appreciably increase the degree to which the Proposed Development would be screened from its surroundings."*

4.4.3. It continues *"...significant effects on landscape character would continue to be localised as a result of the revised (MSA) scheme, and would not differ materially from those reported in the Original ES. Effects on the landscape fabric of the Site itself would also be as reported in the Original ES and would not be significant."*

4.4.4. The MSA LVIA landscape character findings and in particular the detailed Landscape Character tables in Appendix 5.4 of the MSA LVIA, have been reviewed and are summarised with LDA comments in Section 7.1 (Appendix).

4.4.5. Although differing in some of the details of the landscape assessment as indicated below in Section 7.1 (Appendix), the general conclusions above as quoted in 4.4.2-4.4.3, broadly align with those of LDA.

4.4.6. The exception to this is the effect on site topography (as part of the landscape fabric); the residual effect upon which is likely to be significant. However due to mitigation planting and wildflower grassland proposed it is agreed that although significant initially, residual effects on pasture, hedgerows and trees as part of the landscape fabric will not be significant in the longer term; however, such effects would in our opinion remain adverse rather than beneficial as predicted in the LVIA.

³⁹ Colne Valley Services 5-12 Environmental Statement Volume 6 Regulation 25 Update Main Report June 2021

- 4.4.7. Going on to comment on the Visual Assessment conclusions, 5.7.5 of the MSA LVIA states that; *"...to the west and south-west, a belt of woodland up to approximately 185m wide would enclose the developed areas of the Site and would link with adjacent existing woodland. Over time, once this proposed planting has developed, the revised (MSA) scheme would be very well screened from the edge of Iwer Heath....to the east, new woodland planting on the embankments of the new slip roads, and on the land at the base of these would over time reduce the visibility of the embankments and associated traffic from the nearby properties...as such, significant effects would occur at four viewpoints (Viewpoints 5, 6, 7 and 10). However, at all of these, the increased amount of screening provided as part of the revised MSA scheme would mean that effects would reduce to non-significant levels in the medium term."*
- 4.4.8. The MSA LVIA visual assessment findings and in particular, the detailed Visual Assessment tables in Appendix 5.5 (as updated) of the MSA LVIA, have been reviewed and are summarised with LDA comments in Section 7.4 (Appendix).
- 4.4.9. Having reviewed the Visual Assessment tables it is agreed that significant effects would occur at a number of viewpoints in the short term. However, the increased amount of screening provided as part of the revised MSA scheme would mean that visual effects would generally reduce to non-significant levels in the medium to long term.
- 4.4.10. As set out earlier, one section of the MSA LVIA which could be improved is the assessment of construction effects. Although the range of construction activity is discussed in some detail, the landscape and visual effects are not quantified, and the conclusion of these effects being not significant is neither explained nor justified.
- 4.4.11. There is also limited information on night-time effects.
- 4.4.12. Landscape and visual effects on the Colne Valley Regional Park (CVRP) are set out in paras. 5.4.49-5.4.51 of the original MSA LVIA. The conclusion, set out in 5.4.51 is that *"...the Proposed Development would not materially affect the objectives of the CVRP (as set out in Section 5.3), and would indeed help to achieve objectives in terms of biodiversity, recreation and community"*.
- 4.4.13. While the Reviewers agree with the overall conclusion that the proposed MSA would not materially affect the objectives of the CVRP, and whilst it is also accepted that the LVIA has chosen to use the Colne Valley Landscape Character Assessment CVCAs as a basis for the assessment, there is no quantitative assessment of the construction and operational effects of the proposed development on the Colne Valley Regional Park as landscape receptor in overall terms.
- 4.4.14. Effect on the openness of the Green Belt is reviewed in paras. 5.4.52 -5.4.55 of the original MSA LVIA. It concludes that *"...To the west of the motorway, ... the Proposed Development would result in clear change in the elements present within the view (there would be a significant visual effect), but this change would not materially reduce the sense of openness. Views are presently towards a horizon defined by tree cover within the Site. The Proposed Development would replace the existing trees with new buildings and new tree planting, but would not restrict the views across*

the intervening fields towards the Site. The existing and proposed views when vegetation has become established are similar in nature and the perception of openness would not materially alter."

- 4.4.15. It is beyond the scope of this Review to consider the effect of the proposed development on the Green Belt, and no judgements are therefore made in relation to the principle of development in the Green Belt, nor the impact of development on the purposes of the Green Belt (as defined by the NPPF). However, consideration has been given to issues of openness and coalescence in so much that they relate to a landscape and visual perspective.
- 4.4.16. Having visited the site and environs and appraised the relevant photomontages and assessments of the study area, the Reviewers agree that while the proposed vegetation would largely contain the MSA, there would undoubtedly be some localised impact on the visual openness of the landscape and there are a number of viewpoints from which the visual effect of development will be significant in the short term.
- 4.4.17. In terms of wider context, the LVIA is correct in stating that open views across the study area (with the exception of some minor glimpses of Uxbridge through trees to the east and Iver Heath to the west) are currently limited around its periphery by tree groups and hedgerows, a majority of which are to be retained. The mitigation planting proposed would replace that lost to development in the centre of the site and the peripheral buildings and car park are generally designed to sit low in the landscape as can be seen in DAS Section 4.0, cross sections CC and DD. In these and the photomontages the amenity building would appear to lie generally below the perceived height of the mature existing/proposed trees, in which case it would not additionally restrict views across the site, as reported in the LVIA.
- 4.4.18. Overall, across the site itself and within its peripheral curtilage, (eg from VP5,) there would a *localised* reduction in length / extent of open of views, but little discernible change to the visual openness of the landscape beyond the site and its immediate environs.
- 4.4.19. In relation to the visual perception of settlement coalescence, the proposed development is located within a relatively narrow part of the Green Belt between Iver Heath and Uxbridge. However the landscape mitigation proposals in our opinion would help integrate the proposed development into the landscape and reduce the potential for visual coalescence.
- 4.4.20. Cumulative Landscape and Visual Effects in respect of introducing the Proposed Development into a scenario where the proposed "screen industries growth hub" south of Pinewood Studios is also present (application ref: PL/20/3280/OA) are assessed in paras. 5.5.1-5.5.3 of the original MSA LVIA. It concludes that "...the effects of the two schemes would occur within different areas, and there would be little or no interaction between the two that would result in cumulative change to landscape character, or to views. As such, the effects of the Proposed Development in this scenario would not differ materially from those identified in Section 5.4, and cumulative landscape and visual effects would not be significant." This accords with the opinion of the Reviewers.

5.0 Review of LVIA Presentation

- 5.1.1. The MSA LVIA text is generally well presented and logical in terms of layout and contents. However in respect of the Minerals LVIA there are some issues regarding approach as mentioned above in 2.1.5 ; and in particular it is not always clear to the reader which elements relate to the Proposed Minerals Development, and which relate to the Proposed MSA Development.
- 5.1.2. The Landscape Character Effects tables in Appendix 5-4 are again generally well laid-out and informative. However, the function of the column between Susceptibility and Value and as to precisely which of the two headings it relates to, or both, is not immediately apparent to the reader; nor does it appear to be explained in the methodology.
- 5.1.3. The Viewpoint Effects tables in Appendix 5-5 are also generally well laid out and informative. However, one criticism is that the important findings towards the end of each table; i.e, effects and significance (short and long- term/ residual) are inconsistent and not immediately obvious to the reader who often has to "trawl" through the text in order to locate these.
- 5.1.4. The photographs and photomontages as noted above in 2.2.6, have been carried out in line with current good practice and are clearly presented. It is noted that foreground vegetation, fenceposts, gates and fencing appear in a number of the photographs and whilst this might offend some purists, it is nevertheless felt to be an accurate reflection of the site environs at these locations.
- 5.1.5. The LVIA figures all appear to be clearly presented and well laid out; although it is noted that there is no evidence of checking given.
- 5.1.6. ZTV issues are discussed above in 1.3.4.

6.0 Conclusions & Key Findings

- 6.1.1. LDA was commissioned in mid-October 2021 by Buckinghamshire Council, (BC) to review two inter-related Landscape and Visual Impact Assessments (LVIAs) supporting the following applications;
- The mining and minerals application, which, at the time of writing, is being considered by BC under reference CM/0036/21 (the Minerals Application/ the Minerals Development); and
 - The outline application for the Colne Valley Motorway Services Area (MSA), which at the time of writing, is being considered by BC under planning reference PL/20/4332/OA (the MSA Application/ the MSA Development).

The MSA Application relies on the Minerals Application as a pre-requisite of its subsequent implementation.

Here follows a summary of the main Review Conclusions with key findings **emboldened**.

- 6.1.2. The MSA Scoping Report appears to accord with the methodology subsequently adopted by the MSA LVIA. As regards the Minerals Development, there appears to be no reference to this in the MSA Scoping Report; nor does there appear to have been a Scoping Report produced specifically in support of the Minerals Application. **A Scoping Report produced for the Minerals Development specifically and an appropriate Scoping Response from BC Planning may have avoided the Applicant's approach issues identified in this Review.**
- 6.1.3. Since the MSA Development landscape mitigation proposals are assumed in the Minerals LVIA to be the ultimate restoration proposals for the Minerals Development, the ZTV, visual assessment tables and landscape assessment tables for the Minerals Development in the Minerals LVIA appear identical to those presented in the MSA LVIA. **There should be specific landscape and visual assessments of the "construction" and "operation" period of the mineral workings themselves. The application for the minerals application could also potentially include post-mineral extraction restoration plan, which could be put in place as a contingency in the eventuality that the MSA does not come forward.**
- 6.1.4. Specifically in relation to the proposed MSA LVIA, there is no detailed assessment for the construction period of the MSA and there are no clear judgements on the operational residual landscape and effects. **The construction and residual operational effects should be properly quantified. There is also limited information on night-time effects.**
- 6.1.5. The LVIA methodology appears to be informed by GLVIA3 and are considered to be generally robust and together with the choice of study area extent, are considered to be appropriate for the scale and nature of both the Minerals Development and the MSA Development. **However it is considered that 'value' is not clearly defined in the visual**

be little discernible change to the visual openness of the landscape beyond the immediate site environs.

- 6.1.12. Cumulative Landscape and Visual Effects in respect of introducing the Proposed Development into a scenario where the proposed “screen industries growth hub” south of Pinewood Studios is also present are assessed. This concludes that the effects of the Proposed Development in this scenario would not differ materially from those identified in the LVIA, and cumulative landscape and visual effects would not be significant. **It is agreed that the cumulative landscape and visual effects would not be significant.**

7.0 Appendix: Landscape and Visual Effects Review

7.1 Introduction

- 7.1.1. The following tables provide a review of the recorded operational effects on landscape fabric, landscape character and views. As noted above the residual effects predicted are the same for both the Minerals LVIA and the MSA LVIA. Disagreements with LVIA evaluations and assessments and suggested revisions are shown as **red text**.
- 7.1.2. It should also be noted that construction effects; night-time effects and the effects on the CVRP are not quantified, so no review / alternative judgements can be made.

7.2 Landscape fabric

7.2.1. Pasture Grassland

	Reported: Short Term (1yr) / Longer Term (10yr) (where stated)	LDA Judgements (where different)	LDA Comments
Susceptibility to Change	Low-Medium		
Value	Low-Medium		
Sensitivity	Low-Medium		Mention should be made of former sand and gravel workings within development site that would be the precursor to the MSA development although this is unlikely to affect overall sensitivity.
Magnitude	Large		
Effects	Moderate Adverse / Not Significant Beneficial in longer term / level of significance not stated	Moderate-Major Adverse (Significant) Minor Adverse (Not Significant)	It is considered that effects have been understated. On balance the long term effects are considered to be adverse rather than beneficial. While there would be long term benefits from new planting, the majority of the existing grassland would be removed.

7.2.2. Trees and Hedgerows

	Reported: Short Term (1yr) / Longer Term (10yr) (where stated)	LDA Judgements (where different)	LDA Comments
Susceptibility to Change	Medium-High	High	
Value	Medium-High	High	
Sensitivity	Medium-High	High	It is considered that sensitivity has been understated due to the important contribution trees and hedgerows makes to character of the site and its surroundings.
Magnitude	Medium		This reflects the amount of tree removal overall
Effects	Moderate Adverse / Not Significant Beneficial in longer term / level of significance not stated	Moderate-Major Adverse (Significant) Minor Adverse (Not Significant)	It is considered that effects have been understated. On balance the long term effects are considered to be adverse rather than beneficial. While there would be long term benefits from new planting, existing areas of woodland and hedgerow would be removed.

7.2.3. Topography

	Reported	LDA Judgements	LDA Comments
Susceptibility			
Value			
Sensitivity			
Magnitude			
Effects			This have not been assessed in the LVIA but it is considered likely that effects on topography would be adverse and significant - both in the short and longer term – due to permanent changes to ground levels.

7.3. Landscape Character

7.3.1. Colne Valley Regional Park

	Reported: Short Term (1yr) / Longer Term (10yr) (where stated)	LDA Judgements (where different)	LDA Comments
Susceptibility to Change			
Value			
Sensitivity			
Magnitude			
Effects			This have not been assessed in the LVIA but it is considered likely that effects on the CVRP would not be significant - both in the short and longer term – due to the localised effects on landscape fabric / character and no changes to the key characteristics of the CVRP.

7.3.2. CVCA Colne Valley: A412 to Iver

	Reported: Short Term (1yr) / Longer Term (10yr) (where stated)	LDA Judgements (where different)	LDA Comments
Susceptibility to Change	Medium		
Value	Medium		
Sensitivity	Medium		
Magnitude	Large (localised) Small (wider context)		Mention should be made of former sand and gravel workings within development site that would be the precursor to the MSA development although this is unlikely to affect overall sensitivity.
Effects	Moderate to Major Adverse / Significant (at site scale and immediate environs) Minor Adverse / Not Significant (in the wider context)		This broadly aligns with Reviewers Assessment

7.3.3. CVCA Denham Valley Floor

	Reported: Short Term (1yr) / Longer Term (10yr) (where stated)	LDA Judgements (where different)	LDA Comments
Susceptibility to Change	Low-Medium		
Value	Low-Medium		
Sensitivity	Low-Medium		
Magnitude	Small		
Effects	Minor Neutral / Not Significant		This broadly aligns with Reviewers Assessment

7.3.4. CVCA Iver Heath Terrace

	Reported: Short Term (1yr) / Longer Term (10yr) (where stated)	LDA Judgements (where different)	LDA Comments
Susceptibility to Change	Low-Medium		
Value	Medium		
Sensitivity	Low-Medium		
Magnitude	Medium-Large (localised) Negligible (wider context)	Medium-Large (localised) Small (wider context)	There would be some small changes to landscape character beyond the site, as a result of changes to landscape fabric and some intervisibility with the proposed development.
Effects	Moderate Adverse / Not Significant (at site scale and immediate environs) Negligible / Not Significant (in the wider context)	Moderate Adverse / Not Significant (at site scale and immediate environs) Minor Adverse / Not Significant (in the wider context)	It is considered that effects have been understated as described above. However, the effects would remain Not Significant.

7.4. Visual Effects

7.4.1. VP1: Denham Road

	Reported: Short Term (1yr) / Longer Term (10yr) (where stated)	LDA Judgements (where different)	LDA Comments
Susceptibility to Change	Medium		
Value	Low		
Sensitivity	Low-Medium		
Magnitude	No Change		
Effects	No Effect (No change in view)		This broadly aligns with Reviewers Assessment

7.4.2. VP2: Bangors Road North; Bus Stop

	Reported: Short Term (1yr) / Longer Term (10yr) (where stated)	LDA Judgements (where different)	LDA Comments
Susceptibility to Change	High		
Value	Medium	Medium-High	The value judgement does not appear to reflect the views from nearby properties, despite this being part of the applied value criteria.
Sensitivity	High		
Magnitude	Negligible	Small	There would be some changes to views with built form potentially visible above intervening vegetation, including more open views from upper floors of two-storey houses along this route (see paras.2.2.5 and 2.2.8 and Plate 1 above).
Effects	Negligible Neutral / Not Significant	Minor Adverse / Not Significant	It is considered that effects have been understated as described above. However, the effects would remain Not Significant.

7.4.3. VP3: Bangors Road North

	Reported: Short Term (1yr) / Longer Term (10yr) (where stated)	LDA Judgements (where different)	LDA Comments
Susceptibility to Change	High		
Value	Medium	Medium-High	The value judgement does not appear to reflect the views from nearby properties, despite this being part of the applied value criteria.
Sensitivity	High		
Magnitude	Small-Medium (short term) Small (long term)		
Effects	Moderate Adverse / Not Significant (short term) Minor Neutral / Not Significant (long term)	Moderate Adverse / Not Significant (short term) Minor Adverse / Not Significant (long term)	It is considered that there will remain adverse long term effects due to potential structures being visible through / above the proposed woodland planting. However, the effects would remain Not Significant.

7.4.4. VP4: Footpath off Bangors Road North

	Reported: Short Term (1yr) / Longer Term (10yr) (where stated)	LDA Judgements (where different)	LDA Comments
Susceptibility to Change	High		
Value	Medium-High (NB – also referred to as Medium within body of text)	Medium	The value of the view to receptors on public footpaths is shown as Medium-High regardless of the prevailing context and in this case does not reflect the fact that the views out are filtered or obscured by adjacent fencing/ hedgerows.
Sensitivity	High	Medium-High	A lower value judgement would potentially reduce the overall sensitivity judgement.
Magnitude	Small-Medium (short term) Small (long term)		
Effects	Moderate Adverse / Not Significant (short term) Minor Neutral / Not Significant (long term)	Moderate Adverse / Not Significant (short term) Minor Adverse / Not Significant (long term)	It is considered that there will remain long term adverse effects due to potential structures being visible through / above the proposed woodland planting. However, the effects would remain Not Significant.

7.4.5. VP5: Footpath, Eastern Edge of Iver Heath

	Reported: Short Term (1yr) / Longer Term (10yr) (where stated)	LDA Judgements (where different)	LDA Comments
Susceptibility to Change	High		
Value	Medium-High (NB – also referred to as Medium within body of text)	Medium	The value of the view to receptors on public footpaths is shown as Medium-High regardless of the prevailing context and in this case, does not reflect the fact that southerly views are partially filtered or obscured by adjacent fencing/hedgerows.
Sensitivity	High	Medium-High	A lower value judgement would potentially reduce the overall sensitivity judgement.
Magnitude	Medium-Large (short term) Small (long term)		
Effects	Moderate-Major Adverse / Significant (short term) Minor Neutral / Not Significant (long term)	Moderate-Major Adverse / Significant (short term) Minor-Moderate Adverse / Not Significant (long term)	It is considered that there will remain long term adverse effects due to potential structures being visible through / above the proposed woodland planting. In addition, in accordance with the Applicants methodology, a medium-high sensitivity combined with a small magnitude would suggest effects that are towards the moderate level. However, the effects would remain Not Significant.

7.4.6. VP6: Field, North of White Cottage

	Reported: Short Term (1yr) / Longer Term (10yr) (where stated)	LDA Judgements (where different)	LDA Comments
Susceptibility to Change	High		
Value	Medium	Medium-High	The value does not appear to reflect the views from nearby properties, despite this being part of the defined value criteria.
Sensitivity	High		
Magnitude	Medium-Large	Medium-Large (short term) Small-Medium (long term)	In it considered that in the long term, as planting matures, the magnitude of change will reduce. While there will remain a change to views, with open foreground views and distant views across the Colne Valley obscured by the proposed woodland planting, new tree cover will be inherently more characteristic than views of built development.
Effects	Moderate-Major Adverse / Significant (short term) Moderate-Major; Neutral / Significant (long term)	Moderate-Major Adverse / Significant (short term) Moderate-Minor Adverse / Not Significant (long term)	As a result of the reduced magnitude, the effects will accordingly reduced. On balance the long term effects are considered to be adverse rather than neutral, due to the loss of open views and potential structures visible through / above the proposed woodland planting.

7.4.7. VP7: Mansfield Lodge Access

	Reported: Short Term (1yr) / Longer Term (10yr) (where stated)	LDA Judgements (where different)	LDA Comments
Susceptibility to Change	High		
Value	Medium	Medium-High	The value does not appear to reflect the views from nearby properties, despite this being part of the applied value criteria.
Sensitivity	High		
Magnitude	Large (short term) Medium (long term)		
Effects	Major Adverse / Significant (short term) Moderate Adverse / Not Significant (long term)		This broadly aligns with Reviewers Assessment

7.4.8. VP8: Denham Road Bridge

	Reported: Short Term (1yr) / Longer Term (10yr) (where stated)	LDA Judgements (where different)	LDA Comments
Susceptibility to Change	Medium		
Value	Low		
Sensitivity	Low-Medium		
Magnitude	No Change		
Effects	No Effect (No change in view)		This broadly aligns with Reviewers Assessment

7.4.9. VP9: Junction of Footpath with Slough Road

	Reported: Short Term (1yr) / Longer Term (10yr) (where stated)	LDA Judgements (where different)	LDA Comments
Susceptibility to Change	Medium		
Value	Low		
Sensitivity	Low-Medium		
Magnitude	Large (short term) Small (long term)		
Effects	Moderate Adverse / Not Significant (short term) Minor Beneficial / Not Significant (long term)	Moderate Adverse / Not Significant (short term) Minor Adverse / Not Significant (long term)	On balance the residual effects are considered to be adverse rather than beneficial, due to the considerable adverse changes to existing views in the short term and potential structures still being visible through / above the proposed maturing woodland planting in the longer term.

7.4.10. VP10: Mansfield Farm Access

	Reported: Short Term (1yr)/ Longer Term (10yr) (where stated)	LDA Judgements (where different)	LDA Comments
Susceptibility to Change	Medium		
Value	Medium	Medium-High	The value does not appear to reflect the views from nearby properties, despite this being part of the defined value criteria.
Sensitivity	Medium	Medium-High	
Magnitude	Large (short term) Medium (long term)		
Effects	Major Adverse / Significant (short term) Moderate Adverse / Not Significant (long term)		This broadly aligns with Reviewers Assessment

7.4.11. VP11: New Denham

	Reported: Short Term (1yr)/ Longer Term (10yr) (where stated)	LDA Judgements (where different)	LDA Comments
Susceptibility to Change	High		
Value	Medium-High		
Sensitivity	High		
Magnitude	Negligible		
Effects	Negligible Neutral / Not Significant		This broadly aligns with Reviewers Assessment