

Matter No. 2

### Response to Main Issues for Examination from West Parley Parish Council

We wish to attend the examination to respond orally to the issues listed below. James Stacey, BA (Hons) DipTP MRTPI, Director at Tetlow King Planning will represent the Parish Council at examination. Cllr Richard Heaslip CB (WPPC) will also participate in the debate where appropriate.

### **Inspector's Questions**

- 1 Is the proposal to make limited changes to the Green Belt justified?
- 2 Have the green belt boundaries been assessed to consider their capability to endure beyond the plan period, as advised in NPPF paragraph 83?
- Does the CS set out a precise timescale and clear process for the GB boundary changes?
- Are the GB boundaries for every development proposal clearly defined on proposals maps?

### **Summary**

	1	2	3	4
Test of Soundness	Not justified by the evidence base.	Not justified by the evidence base.	Not effective	Not effective.
Suggested Modification	Council undertake Green Belt Review	Council undertake Green Belt Review	Council produce plans showing land removed from the Green Belt.	a proposal map



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### Matter 2 - Green Belt

### Question 1: Is the proposal to make limited changes to the Green Belt justified?

- 1.1 The proposed changes to the Green Belt within the Core Strategy as a result of strategic allocations rely on out of date evidence which was produced to support the now abolished Regional Spatial Strategy. This work dates from 2005 and must have been formulated in 2004 or even earlier whilst the RSS evidence identified 'Areas of Search' it also identified at the outset key features, key edges and more importantly key gaps. As can be witnessed on any map of the Green Belt around Ferndown and West Parley and the wider Bournemouth conurbation the narrowest point between the settlements is at West Parley. For this reason wholly unacceptable to place two large urban extensions without solid defensible boundaries to resist future development pressures for further encroachment into the Green Belt. The protection of the Green Belt is afforded the highest status in the NPPF. The allocations at West Parley undermine the five aims of the Green Belt. The allocations will cause the settlements to coalesce and will cause irreversible harm that will be difficult to stop in the future owing to the poorly defined boundaries creating an inevitable pressure for future development.
- 1.2 In South East Dorset the Councils conducted a Green Belt review in 2005 as part of the South East Dorset Development Options report (OD23). Colin Buchanan produced a regional analysis of Green Belt in 2006 based on these results (OD19). Since this time the Green Belt sites have not been analysed by the Councils. Both reports identify the 'inner area' of Green Belt between Bournemouth and West Parley as the area most sensitive to change. Similarly we have been unable to locate a sequential site assessment of non Green Belt sites for possible housing development.
- 1.3 Given the Core Strategy evidence base does not contain an analysis of alternative sites within the Green Belt (or elsewhere in the district) it is not possible to establish those which are most suitable for development and those which should be excluded from development. A localised Green Belt review is a necessary exercise for Councils to conduct to clearly demonstrate the decision-making process to consultees and to demonstrate a sound Plan. Such a review enables the value of the Green Belt to be assessed through a clear methodology and engages consultees with the process.
- 1.4 The subsequent evidence provided by the Councils' masterplanning reports, ED62 and ED63, to justify the changes to the Green Belt has not been supported by the early and meaningful collaboration with neighbourhoods as required by N.P.P.F. paragraph 155.
- 1.5 WPPC commissioned FIRA Landscape Architects to undertake a landscape and visual assessment of the area around West Parley as well as a review of the Green Belt assessments undertaken by the Council some 8-10 years ago. The consultants identified that the South East Dorset Green Belt was reviewed as part of the RSS evidence base in 2005 (OD23). The West Parley sites were only assessed at a late stage (step 7) in a section entitled 'Identification of Overlooked Potential'. This meant the testing of the West Parley allocations was less robust than allocations at; West



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Corfe Mullen, Verwood and Wimborne. OD23 represents the only strategic Green Belt assessment for East Dorset and Christchurch, the report does not contain sufficient detail on the alternative sites in each district and does not rigorously test the sites which are now proposed as the housing allocations in the Core Strategy. The lack of an up-to-date evidence base means that a true assessment of suitable alternatives has not taken place. The plan is therefore unsound as it is not **justified** by evidence.

- 1.6 The subsequent work undertaken for EDDC by Broadway Malyan (ED62) includes an analysis of the landscape value but the criteria used only establish the sensitivity of the landscape and do not consider the magnitude of the effects or the cumulative impact of the housing proposals on the landscape character of West Parley. FIRA suggests that the methodology used by Broadway Malyan is now out-of-date as numerical scoring system has never been in accordance with the Guidelines for Landscape and Visual Impact Assessment. The latest 2013 guidance specifically advises consultants not use a numerical-based system. Broadway Malyan have also not included any community consultation in assessing the value of the landscape demonstrating an out-of-date methodology.
- 1.7 The landscape work prepared by East Dorset District Council was published prior to the addition of the link roads and the enlarged SANG areas. The link road and enlarged SANGs will have the greatest impact on the Green Belt. The alteration of the entire area north of the river to provide recreational SANG space will dramatically change the character of the northern bank of the River Stour from agricultural land to an urbanised landscape.
- 1.8 The link roads status as distributor roads will mean a large number of heavy goods vehicles will travel through the Green Belt creating a significant visual impact. FIRA's landscape assessment (page 27, appended) identifies that the construction of the link road will result in the loss of many of the mature trees and woodland defining the edge of the floodplain. This line of trees defines the edge of the Green Belt, preserving green views from both Bournemouth and West Parley. The loss of these trees will enable the urban areas of Bournemouth and West Parley to be visible from one another, giving the impression of coalescing settlements. There has not been assessment of the impact of these features on the wider landscape character of West Parley. The Historic Landscape Assessment makes only a passing reference to the impact of the link road on the setting of Dudsbury Hillfort (paragraph 3.54, page 20). The report notes that it is impossible to assess the impact of the road without detailed plans of the location and design of the road. The Councils' policies FWP6 and FWP7 are unjustified without a thorough landscape assessment taking into account all elements of the allocations and the value of the Green Belt at West Parley.

### Suggested Modification

1.9 We are unable to suggest a proposed modification. The Plan should be either withdrawn or postponed until a strategic review has taken place to satisfactorily inform the plan-making process. We suggest that a strategic Green Belt review is



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commissioned across the two districts in order to establish the most suitable areas for development, taking account of cumulative impacts. This should be conducted with the input of local communities in order to assess the local value of Green Belt land. As it stands WPPC consider that the Core Strategy is unsound because there is not appropriate and reliable evidence base.

# Question 2: Have the Green Belt boundaries been assessed to consider their capability to endure beyond the plan period, as advised in NPPF para 83?

- 1.10 OD19 and OD23 both emphasise the importance of the Green Belt between Bournemouth and West Parley as a **key gap** to prevent the coalescence of settlements. Despite this, the proposed changes to the Green Belt boundaries will reduce the gap separating Bournemouth and West Parley. Given that preventing the coalescence of settlements is a key purpose of the Green Belt as set out in the NPPF, the Councils have not **justified** that the proposed boundaries will maintain the gap between Bournemouth and West Parley beyond the plan period.
- 1.11 FIRA, the landscape consultants commissioned by WPPC, assessed the cumulative impact of the strategic allocations on the landscape at West Parley. FIRA identified several areas outside the allocations and within the Green Belt which will be vulnerable to future development pressure if the proposed allocations are constructed, particularly to the East of New Road (see page 26 of the appended Landscape and Visual Assessment). The loss of openness at these locations would reduce the key gap between the West Parley and Bournemouth. The Core Strategy does not provide adequate protection to prevent the coalescence of settlements into the future and may enable further development to take place in the Green Belt in the future. Such consideration of possible development, if not excluded by robust development boundaries, should be considered at the outset of the plan to ensure current development proposals are not an the vanguard of a greater level of development beyond the plan period as a consequence of ill-conceived boundaries at the outset.

### Suggested Modification

1.12 We are unable to suggest a proposed modification. The Plan should be either withdrawn or postponed until a strategic review has taken place to inform the planmaking process. We suggest that a strategic Green Belt review is commissioned across the two districts in order to establish the most suitable areas for development. This should be conducted with the input of local communities in order to assess the local value of Green Belt land. As it stands WPPC consider that the Core Strategy is unsound because there is not appropriate and reliable evidence base.

## Question 3: Does the CS set out a precise timescale and clear process for the GB boundary changes?

1.13 The Core Strategy does not clarify when site allocations will be removed from the Green Belt. Of particular concern to West Parley Parish Council is the status of the SANGs.



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Green Belt policy KS2 suggests that SANGs will be included within the Green Belt, however, the Parish Council is concerned that this will result in the SANGs being considered separately and not delivered at the same time as the housing development.

1.14 To ensure the delivery of the SANGs it is suggested that they are included within the area allocated for development and then replaced within the Green Belt once the SANG landscape has been developed.

### Suggested Modification

1.15 We are unable to suggest a proposed modification. The Plan should be either withdrawn or postponed until a strategic review has taken place to inform the planmaking process. We suggest that a strategic Green Belt review is commissioned across the two districts in order to establish the most suitable areas for development. This should be conducted with the input of local communities in order to assess the local value of Green Belt land. As it stands WPPC consider that the Core Strategy is unsound because there is not appropriate and reliable evidence base.

## Question 4: Are the GB boundaries for every development proposal clearly defined on proposals maps?

- 1.16 The Green Belt boundaries are ambiguous concerning the status of SANGs. The Councils have not provided any definitive policy to show whether they are included in either the development or protected land.
- 1.17 Given the concerns about the viability of providing the necessary supporting infrastructure, as raised in WPPC's responses to Matters 1 and 5, WPPC are concerned that ambiguity in the Green Belt boundaries will prompt the developable area to expand so that the quantum of development can meet the costs. The 2008 SHLAA identifies the potential for 80 homes at one site at 200 Christchurch Road, adjacent to Dudsbury Rings and shown within the SANG for FWP7. Once development has been allocated at FWP6 and FWP7 there is no guarantee that land around the allocated sites and within the SANGs will not be brought forward for development. FIRA have produced a diagram (figure 12) showing areas at risk of further development in the appended landscape and visual assessment.
- 1.18 FIRA and WPPC are concerned that the open nature of the area proposed as a SANG West of New Road will be altered through the process of developing the SANG and the housing allocations. The strong tree line will be affected by the development of the link roads and erode the current boundary between Bournemouth and West Parley.

#### Suggested Modification

1.19 We suggest the Councils publish an updated proposals map demonstrating the proposed Green Belt boundaries and showing whether the SANGs are included.

### **APPENDICES**

APPENDIX 1: FIRA LANDSCAPE AND

**VISUAL ASSESSMENT** 

APPENDIX 2: 2008 SHLAA SITE

**SUMMARIES** 

## **APPENDIX 1**

# FIRA LANDSCAPE AND VISUAL ASSESSMENT



# **Land at West Parley**

# Landscape and Visual Assessment

on behalf of West Parley Parish Council

August 2013



#### **FIGURES CONTENTS** 1 **Executive Summary** This assessment is illustrated by reference to the following drawings and photographs: 2 Introduction **Green Belt Review** 4 Figure 1 Location Plan **Landscape Character** 6 Figure 2 Key Edges to Green Belt **Areas of Search** 8 Figure 3 Green Belt Analysis **Assessment Methodology** 10 Figure 4 **Environmental Planning Designations** Ferndown and West Parley Figure 5 **Proposed Housing Allocations** 12 Landscape Character 16 **Landscape Context** Areas of Search Figure 6 Land West of Ridgeway 16 Landscape Capacity Matrix Figure 7 Land South East of Parley Crossroads 20 Figure 8 Appraisal of Landscape Sensitivity and Value **Assessment of Key Impacts** 24 Figure 9 Masterplan for West Parley (Jan 2012) Proposed Housing Allocations (April 2012) Figure 10 **Combined Extent of Development Proposals** 26 Landscape Context Figure 11 **Cumulative Effects** 27 Figure 12 Site Assessment-Conclusions 29 Land West of Ridgeway **Bibliography** Figure 13 Assessment of Potential Impacts-Land West of Ridgeway Figure 14 Site Assessment-Land South East of Parley Crossroads Figure 15 Assessment of Potential Impacts-Land South East of Parley Crossroads Figure 16 Combined Extents of Development Parcels Figure 17 Assessment of Cumulative Impacts

### **EXECUTIVE SUMMARY**

Christchurch and East Dorset District Council are jointly preparing a Core Strategy document. The plan seeks to allocate approximately 520 homes within parcels of land situated on either side of New Road in West Parley. As well as providing new homes for the District, the Council is also seeking to alleviate existing traffic congestion at Parley Crossroads by the delivery of two link roads, funded by the developers, through the new housing areas. Both parcels of land are within the South East Dorset Green Belt and the southern edge of the western parcel is within the flood plain.

West Parley Parish Council (WPPC) has raised objections to the proposed allocation. Fira Landscape Limited were therefore commissioned in May 2013 by WPPC, in association with Tetlow King Planning, to undertake this Landscape and Visual Assessment to inform and support the Parish Council's objections.

The National Planning Policy Framework (2012) requires that policy development is informed by an up-to-date evidence base. This document therefore considers the process that has been undertaken in order to support the proposed allocations. It is concluded that:

• The assessment process to identify potential strategic housing sites was started in response to the now abolished Regional Spatial Strategy (RSS). This work dates from 2004 or earlier and did not look at the potential of all land within or outside the Green Belt. It was undertaken before the introduction of the NPPF and does not appear to have included any local community participation. As such, it does not provide the an up-to-date evidence base required by the NPPF;

- Ind at Parley Cross, the Key Gap maintaining the separate identities of West Parley and Bournemouth (Ensbury) would become less marked and there would be encroachment into countryside affecting views across the Stour Valley. Despite this, the area at West Parley was still identified as one of the preferred locations for an urban extension;
- The land at West Parley was only introduced into the Green Belt Review process at Step 7: 'Identification of Overlooked Potential'. The additional areas identified at this stage do not seem to have been subject to the same rigorous testing as the initial areas of search;
- The landscape assessment carried out by the Housing Options Analysis (6) in 2010 did not consider the impact of the new link road across the land to the west of Ridgeway as this was only included in the proposals at the Core Strategy Pre-Submission stage in April 2012; and
- The methodology used to assess the landscape and visual capacity of the sites is not compatible with either the previous or the updated GLVIA guidance.
  Furthermore, the assessment does not consider the magnitude of the anticipated impact and is not therefore by itself suitable for identifying the potential significance of the effects.

The baseline landscape features of the two parcels of land and the anticipated landscape and visual impacts are considered by this assessment and illustrated by reference to plans and photographs. The anticipated impacts are set out in the Assessment of Key Impacts section.

The assessment methodology providing the justification of the proposed allocations considers the landscape sensitivity and value of the individual housing sites. However it fails to assess the potential magnitude of the anticipated effects and it does not consider the cumulative effects of developing both the parcels of land at West Parley. Unless both areas are brought forward, the alleviation of the traffic problems would not be forthcoming.

It is concluded therefore that the landscape and visual appraisal for the 'Areas of Interest' fails to identify the important landscape and visual contributions made by both the sites. It is apparent that the perceptual qualities of the views available across the sites need to be considered, along with the magnitude of impact that the proposals would have upon them. This should be undertaken incorporating an appropriate level of local community involvement, as advocated by the National Planning Policy Framework.

Consequently, it is concluded that the current form of proposals is driven more by the desire to overcome the problems of traffic congestion at Parley Crossroad than in response to an appropriate assessment of the likely impacts.

This assessment therefore seriously questions the conclusions reached by the Housing Options Master Plan Report and it is evident that further work is required to robustly support the assumptions made. This work may result in different conclusions being reached. This document therefore concurs with the objections raised by West Parley Parish Council relating to the proposed allocations.

### INTRODUCTION

Christchurch and East Dorset District Council are jointly preparing a Core Strategy document. The plan seeks to allocate approximately 520 homes within parcels of land situated on either side of New Road in West Parley. As well as providing new homes for the District, the Council is also seeking to alleviate existing traffic congestion at Parley Crossroads by the delivery of two link roads, funded by the developers, through the new housing areas. Both parcels of land are within the South East Dorset Green Belt and the southern edge of the western parcel is within the flood plain.

West Parley Parish Council (WPPC) has raised objections to the proposed allocation. It does not accept that the evidence base used to identify the potential areas of development has properly considered the landscape value of the areas to be affected or the contribution that these currently make to the cherished local character of West Parley.

Fira Landscape Limited were therefore commissioned in May 2013 by West Parley Parish Council, in association with Tetlow King Planning, to undertake this Landscape and Visual Assessment to inform and support the Parish Council's objections. This document will therefore consider:

- The evidence base used to justify the removal of the land at West Parley from the Green Belt;
- The existing character and condition of the land to be affected by the Proposals and the contribution that it makes to local area;
- The potential effects of the Proposals; and
- The likely long-term impacts of the Proposals

The documents referred to by this assessment are listed in date order in the Bibliography. Where appropriate, any diagrams or analysis reproduced from these documents are cross referenced by footnotes.

The location and extent of the land proposed for allocation is shown on **Figure 1: Location Plan.** It is evident that development in these areas would extend the extent of the existing urban area into the narrow gap formed by the Stour Valley between Ferndown to the north and Ensbury on the northern edge of Bournemouth to the south. This gap is designated as part of the South East Dorset Green Belt.

The general extent of the Green Belt was established by the South East Dorset Structure Plan in 1980, with the detailed boundaries being defined by the subsequent local plans.

The areas of housing proposed by the Core Strategy document will require land to be removed from the Green Belt. The work to identify these locations and the extent of the strategic housing allocations was started in response to the now abolished Regional Spatial Strategy (RSS). This work dates from 2004 or earlier and was undertaken following the identification of 'Areas of Search' by the RSS. The initial suggestions were published in the SE Dorset Joint Study Area First Detailed Proposals (2) in 2005.

Based on the areas of search identified by the RSS, the Councils in the South East Dorset area conducted a Green Belt review in 2005 as part of the South East Dorset Development Options Report (OD23)<sup>(3)</sup>. Consequently, this work was not a strategic review of all the land within and outside the Green Belt, but rather it concentrated on the areas identified by the RSS.

A further analysis of Green Belt within the District was undertaken in the Regional Spatial Strategy Green Belt Review (OD19) <sup>(4)</sup> by Colin Buchanan in 2006, but again this was based on the previous analysis rather than looking at the landscape as a whole. Since this time there has not been any further detailed analysis of the wider Green Belt and the sites have not been analysed by the Councils

The South East Dorset Development Options Report (OD23<sup>(3)</sup> acknowledges that a review of the Green Belt is integral to the development of a spatial strategy for South East Dorset. The South East Dorset Strategy Development Options report <sup>(6)</sup> refers to the Green Belt Review carried out by that report. The conclusions reached for West Parley will now be considered.

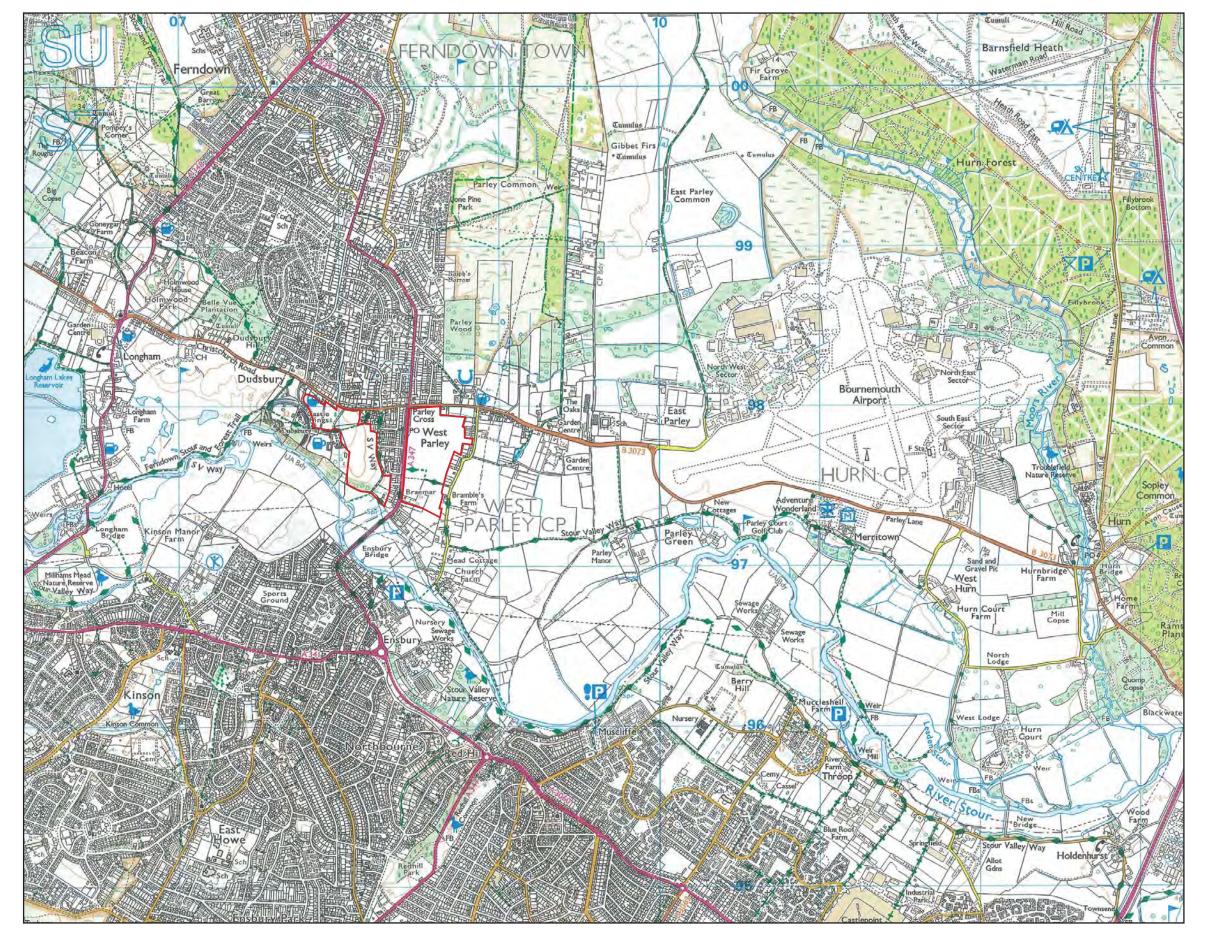




Figure 1: Location Plan





### **GREEN BELT REVIEW**

The South East Dorset Development Options Report (OD23) <sup>(3)</sup> identifies Ferndown and West Parley as settlements whose separate physical identity is protected by the Green Belt. **Figure 2: Key Edges to Green Belt** is reproduced from the document and shows that the edges to the Green Belt on either side of the Stour Valley were identified at this stage.

The Green Belt review carried out by the South East Dorset Strategy Development Options report <sup>(6)</sup> initial concentrated on a range of potential Urban Extension areas, carrying out what is referred to as 'Rigorous Testing of Areas of Search'. The conclusions of this testing are set out in Appendix C of the document. Although areas within East Parley / West Hurn were considered, the sites at West Parley were not included at this stage.

Paragraph 4.42 of the Development Options report <sup>(6)</sup> concludes that there are "no areas of Green Belt which are obviously redundant by failing to meet one or more of the purposes of inclusion within Green Belt". It states that this does not necessarily preclude the loss of Green Belt land to development, but that this "underlines that where this is done it should be with a <u>full appreciation of the impact</u>....,"

The land at West Parley only seems to come into consideration at Step 7 of the process which is referred to as the 'Identification of Overlooked Potential' This identified 6 further areas, but these do not seem to have been subject to the same rigorous testing as the initial areas of search.

Overall, the Development Options report concludes that "the inner areas of the Green Belt appear to show a particular concentration of factors contributing to its

value". A summary analysis is presented which "seeks to suggest those areas where the loss of open land from the Green Belt might have a disproportionately great effect".

The overall conclusions of the analysis are shown on **Figure 3: Green Belt Analysis**, which is reproduced from the document.

Paragraph 4.45 from the Development Options report acknowledges that the refined extensions areas would require removal of land from the Green Belt as currently defined. However, it states that the strategic authorities recognise that although there will be impacts "the effects will not compromise the purposes of the Green Belt and that the balance of advantage remains with development at these limited locations."

Table 8 in the Development Options report summarises the impacts of the proposed extensions on the purposes of Green Belt. The following conclusions are presented for Parley Cross, West Parley:

- Key gap separating identity of West Parley from Bournemouth (Ensbury) would become less marked, but remain intact;
- Some encroachment into countryside affecting views across open Stour Valley

It is evident therefore that the conclusions reached were that the land between Parley Cross and Ensbury is a 'Key Gap' and the existing areas of development form 'Key Edges' to the Green Belt . Issues relating to historic setting are also identified within the area. Despite this, the area at West Parley is still identified as one of the preferred locations for an urban extension.

**Figure 4: Environmental Planning Designations** shows the existing extent of the Green Belt in East Dorset.

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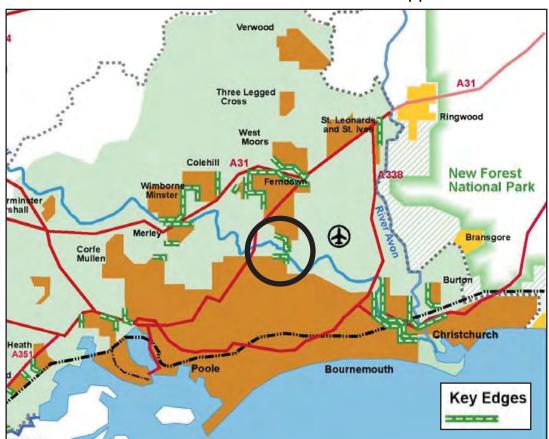


Figure 2: Key Edges to Green Belt

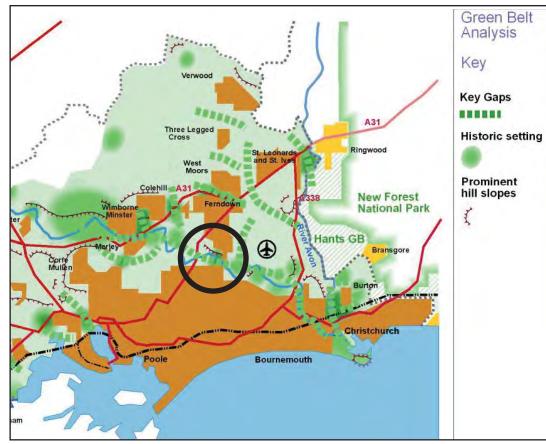
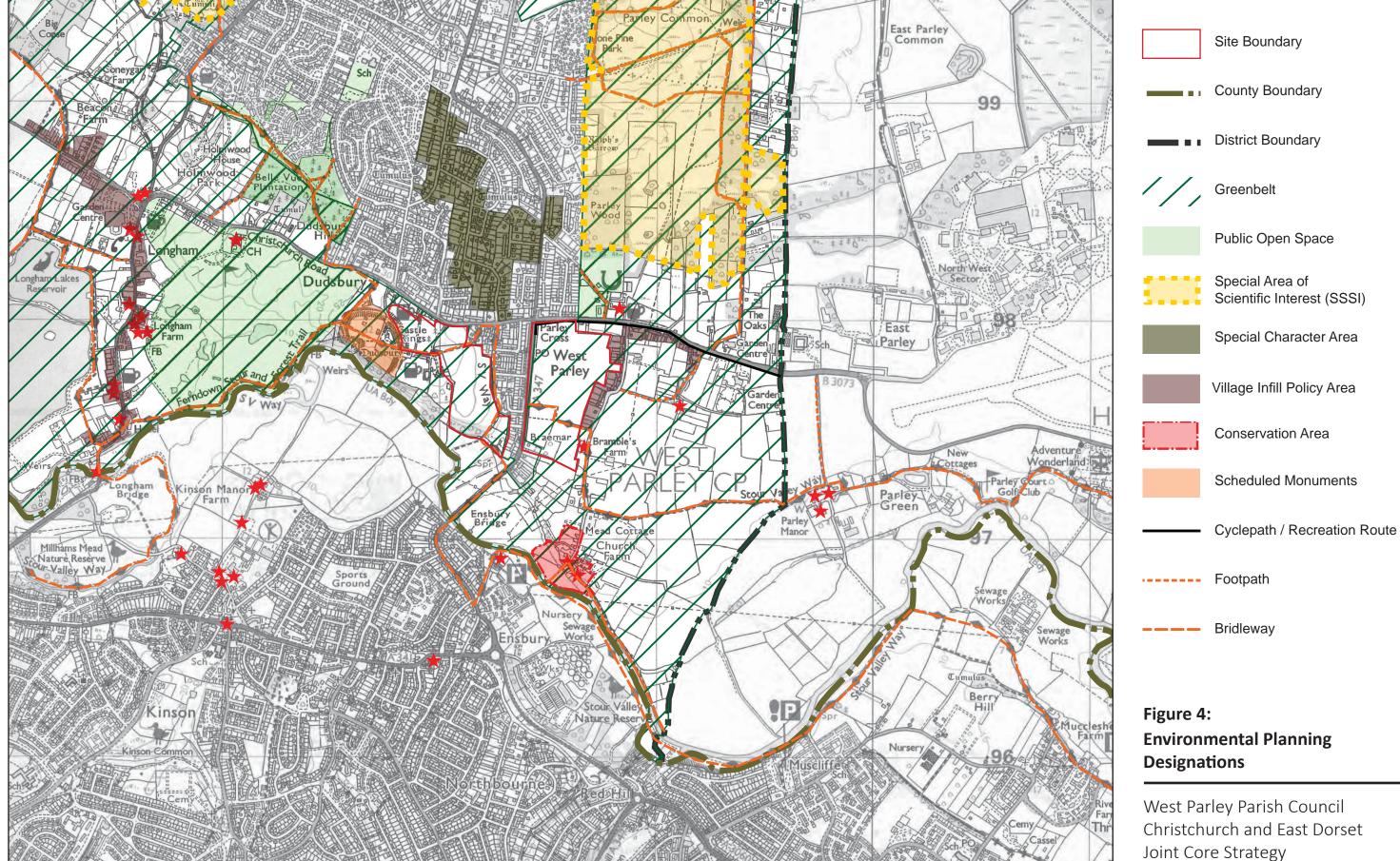
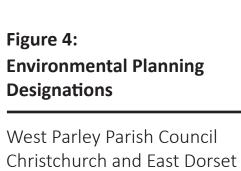


Figure 3: Green Belt Analysis









### LANDSCAPE CHARACTER

This assessment considers the likely impacts on the Green Belt and whether the conclusions reached by the Review can be robustly supported.

The assessment initially considers the character and condition of the landscape forming the Areas of Search around West Parley.

The existing landscape character of the West Parley area was considered by the East Dorset Landscape Character Assessment (2008)<sup>(5)</sup> and a site specific assessment undertaken for the Ferndown and West Parley area in 2010. This was presented in the Housing Options Master Plan Report – 06 Constraints and Opportunities Analysis <sup>(6)</sup>, produced by Broadway Malyan. The Landscape Character Types identified are shown on **Figure 5**, along with the 'Areas of Interest' considered as potential housing sites.

The eastern part of the proposed allocation lies within Area 15: Parley River Terrace. The key characteristics and features are identified as follows:

### Key Characteristics:

- Gentle slope to river
- Sparse tree cover
- Large flat fields
- Urban influences

### Key Features:

- Overhead power lines (adverse impact)
- Ribbon development alongside Christchurch Road and Church Lane
- West Parley hamlet
- Airport flight-path (aircraft noise)

The parcel of land west of New Road lies within Area 14: Dudsbury Ridge. The key characteristics and features are identified as follows:

### Key Characteristics:

- Steep slope to river
- Important woodland
- Extensive views from ridge
- Urban influences

### Key Features:

- Dudsbury Camp
- Golf Course
- Christchurch Road

### Photograph 1

Looking south west across Parley Common



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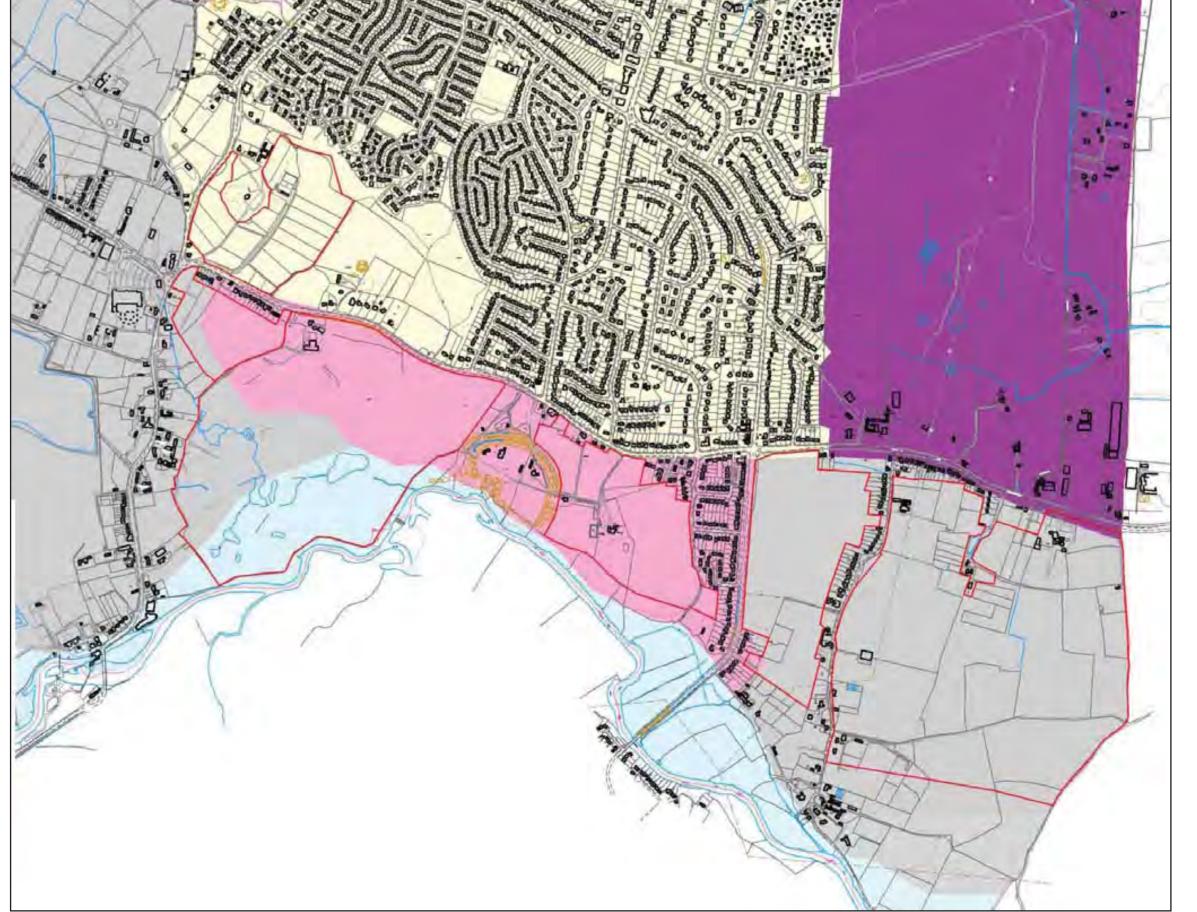




Figure 5: Ferndown and West Parley Landscape Character



### **AREAS OF SEARCH**

Figure 6 shows the seven parcels of land within the Parley Cross area identified as 'Areas of Search'. The land to the west of Ridgeway is identified as Area 4 and the land to the south east of Parley Crossroads is shown as Area 5.

The land to the west of Ridgeway lies on sloping land overlooking the Stour Valley at a height of between 15m and 30m AOD and just to the of west of this area is Dudsbury Hillfort and Rings. The river cliff edge to the south of Dudsbury Camp forms a strong and dramatic landscape edge that contributes strongly to the local character to this area. This is now defined by a visually significant belt of mature trees that are seen on the local skyline from the most viewpoints within this part of the valley.

Dudsbury Hillfort and Rings is designated as a Scheduled Ancient Monument (SAM). English Heritage has submitted an objective (10) to the proposed allocation due to the

potential impact to its setting. Located on a defensive position overlooking the floodplain of the Stour valley, it is evident that the historic setting of the Hillfort is likely to include the scheduled area, plus the river cliffs and significant areas of landscape around it.

In contrast, the land south east of Parley Crossroads is predominantly flat. It consists of a large open agricultural field adjacent to the crossroads, with a tree belt to the south and Stour Valley Way footpath running east-west across the field. There are open views in all directions from the public footpath. A number of large oaks, which are covered by a TPO, form a strong line along Christchurch Road, as shown by the photograph below.

The Housing Options Masterplan Report <sup>(6)</sup> presents an analysis of how the areas of search were refined in order to arrive at the proposed allocations. It states that the methodology for the assessment of the landscape value and character broadly follows the 'Guidelines for Landscape and Visual Impact Assessment', published by the Landscape Institute and Institute of Environmental Management & Assessment, Second Edition 2002 and the 'Landscape Character Assessment Guidance for England and Scotland' published by the former Countryside Agency 2002.

Since the assessment of Housing Options was carried out, the Landscape Institute and the Institute of Environmental Management & Assessment has produced updated guidance, with the Third Edition of the GLVIA (11) published in April 2013. Where appropriate, this document therefore makes reference to the more up to date guidance.

### Photograph 2

Looking south east across Parley Crossroads



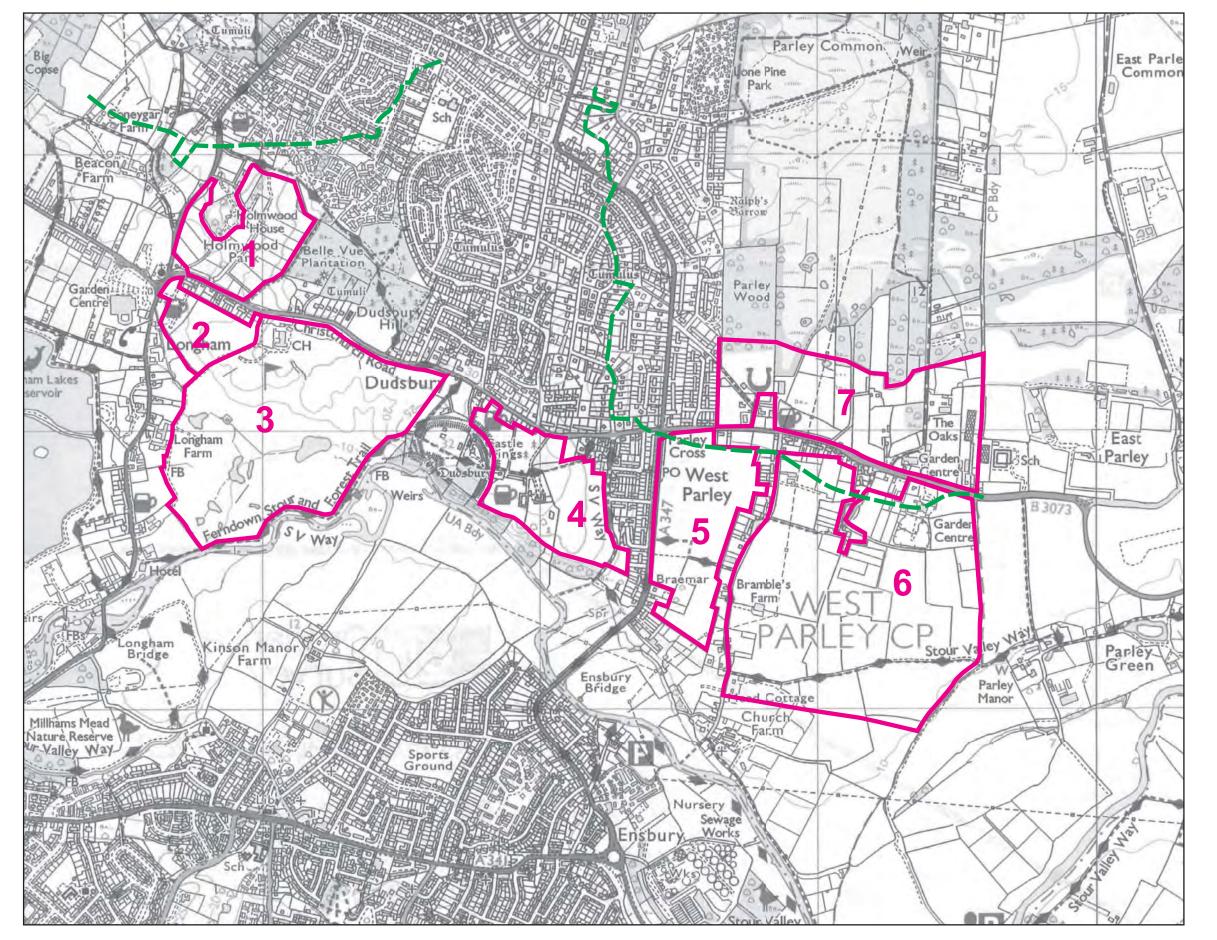




Figure 6: Areas of Search





### **ASSESSMENT METHODOLOGY**

The Housing Options Analysis (6) states that the study of the areas of interest needed to consider the variations in sensitivity and value of the different areas of landscape, and their potential capacity to accommodate housing development without significant adverse effects on the overall character of the surrounding landscape. The general principles set out in both the Second and Third Editions of the GLVIA are that the significance of landscape or visual impacts is determined by considering both the sensitivity of the receptors likely to be affected by the proposals and the magnitude of the anticipated changes.

The Housing Options Analysis <sup>(6)</sup> sought to consider the landscape sensitivity and landscape value of the respective sites in order to establish relative levels of landscape capacity. The criteria used to assess each of the potential sites within the West Parley area are shown in the tables reproduced opposite. It is evident however, that these criteria only seek to establish the sensitivity of the landscape and do not attempt to consider the potential magnitude of the effects. Consequently, the methodology is effectively only carried out on half of the assessment required to determine the significance of the impacts.

With regards to visual impacts, the methodology does not appear to adequately consider the sensitivity of the potential visual receptors. The GLVIA suggests that their sensitivity relates to a number of factors, including expectations and activities and historic associations with cherished views. Users of features such as long-distance footpaths or other activities where their attention is concentrated on their surrounding environment are then identified as having a higher sensitivity than people, for example, passing through the area in cars or at their place of work.

It is claimed that the study has "developed a ranking system, based on Countryside Agency guidance (now Natural England), in order to provide a comparative assessment of potential sites in landscape terms." This involves the use of numerical ranking as set out in the Sensitivity/ Value table opposite and the Landscape Capacity Matrix in Figure 7. However, paragraph 3.27 of the updated GLVIA states that:

"Numerical scoring or weighting of criteria should be avoided, or at least treated with considerable caution, since it can suggest a spurious level of precision in the judgements and encourage inappropriate mathematical combining of scores."

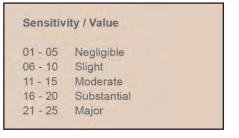
Figure 8 reproduces the summary tables produced in the Housing Options Analysis for (6) the 'Areas of Interest' in West Parley. The land to the west of Ridgeway is identified as Area 4, with the land to the south east of Parley Crossroads is shown as Area 5. It is apparent that the numerical scoring system diminishes the importance of the key existing features of the sites and relies on factors such as landscape designations rather than site specific observations or assessment. There is no incorporation of any perceptual factors and no evidence of the incorporation of any local community involvement in defining the assessment criteria.

It is evident from the tables opposite that the capacity of the two parcels of land on either side of New Road has been considered separately. However, the assessment of cumulative effects is required by both the EIA and SEA Directives and the new GLVIA states that cumulative effects must be considered by any Landscape and Visual Assessment carried out as part of an EIA. Cumulative effects can be defined as the impacts that result from incremental

changes caused by other past, present or reasonably foreseeable actions together with the project under consideration.

It is evident therefore that the methodology used is not compatible with either the previous or the updated guidance and as such is not by itself suitable for identifying the potential significance of the effects.

Consequently, it is concluded that the assessment relies on a flawed and out of date approach and fails to consider the magnitude or significance of the potential impacts.



			Lan	Landscape Value	
	Major	Substantial	Moderate	Slight	Negligible
Major	Negligible Capacity	Negligible Capacity	Negligible / Low Capacity	Low Capacity	Low / Medium Capacity
Substantial	Negligible Capacity	Negligible / Low Capacity	Low Capacity	Low / Medium Capacity	Medium Capacity
Moderate	Negligible / Low Capacity	Low Capacity	Medium Capacity	Medium / High Capacity	High / Medium Capacity
Slight	Low Capacity	Low / Medium Capacity	Medium / High Capacity	High Capacity	High / Very High Capacity
Negligible	Low / Medium Capacity	Medium Capacity	High / Medium Capacity	High / Very High Capacity	Very High Capacity

Figure 7: Landscape Capacity Matrix<sup>(6)</sup>

Average Value

06 - 10 Slight

21 - 25 Major

01 - 05 Negligible

11 - 15 Moderate

16 - 20 Substantial

Final

Value

Assessment

Landscape

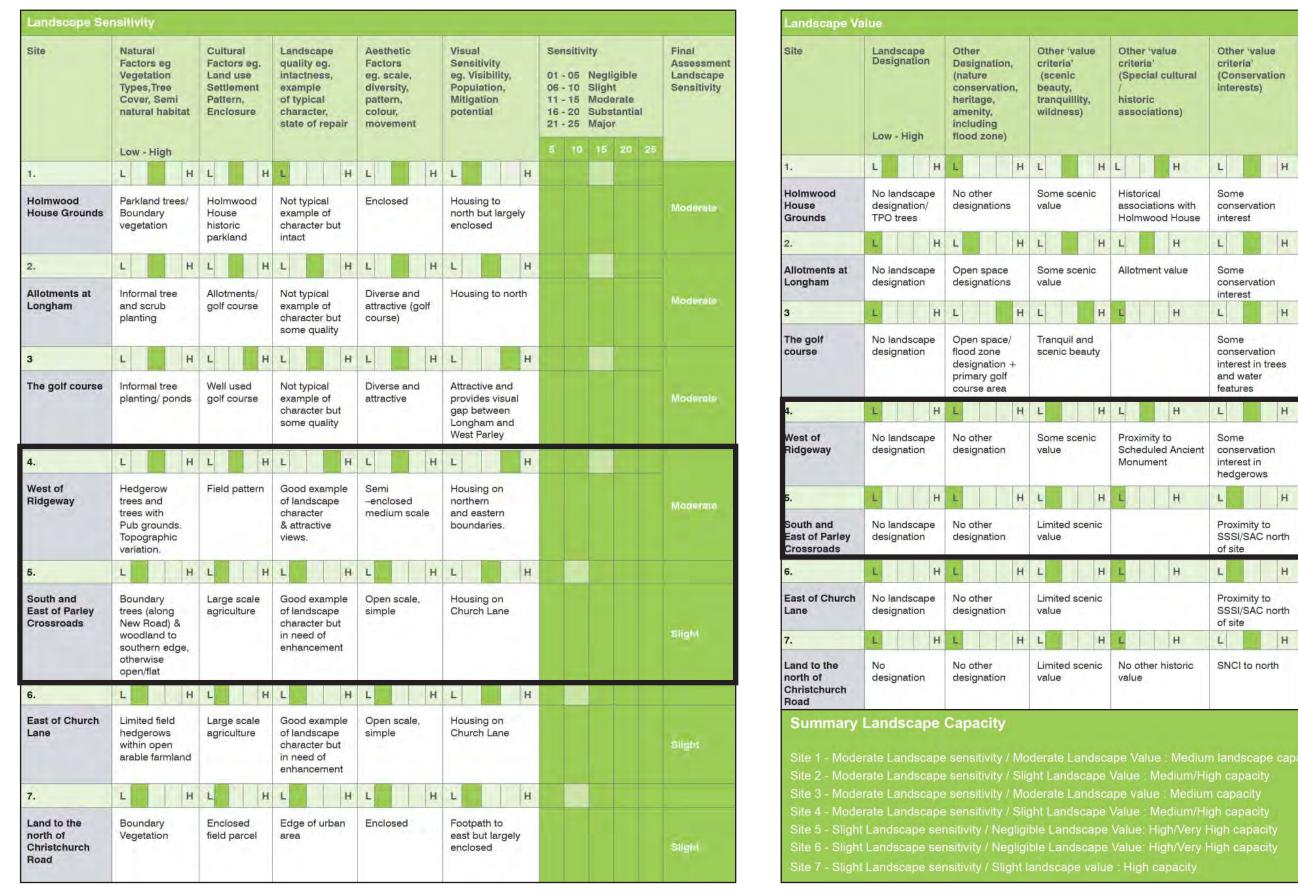


Figure 8: Appraisal of Landscape Sensitivity and Value<sup>(6)</sup>