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Waterside Way, Tring,
Hertfordshire

Critique of the Preferred
Allocation West of Tring
(CALA Homes)

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Appendix 1: Table 3.1 Critique of the CALA Homes LVIA

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Waterside Way, Tring, Hertfordshire
Critique of the Preferred Allocation West of Tring (CALA Homes)

1659_R01a 20 September 2012 MB_RW

Section 1: Introduction

Introduction

- 1.1. This report has been prepared by Tyler Grange LLP on behalf of Waterside Way Sustainable Planning Ltd and forms a critique of the preferred allocation west of Tring in support of representations at the Core Strategy Examination in Public of land off Icknield Way, north of the town.
- 1.2. The preferred allocation site is referred to in the remainder of the report as the CALA Homes site, whereas the site to the north of the town is referred to as the Waterside Way site.

Methodology

- 1.3. Our approach to the critique covered the following steps:
 - A review of the two landscape and visual appraisals/assessments outlining the nature of the sites, their structure and content (Section 2);
 - A site visit of the area undertaken on 11th September 2012 to review both sites within their context and familiarise ourselves with key viewpoints. (Any relevant findings are included within Sections 3 and 4 of the report);
 - Analysis of the CALA Homes site against criteria outlined within the "Guidelines on Landscape and Visual Impact Assessment", Second Edition, Landscape Institute / Institute of Environmental Management, 2002 (Section 3) highlighting any errors or omissions; and
 - Assessment of landscape and visual concerns, a summary table comparing issues between both sites and conclusions (Section 4).

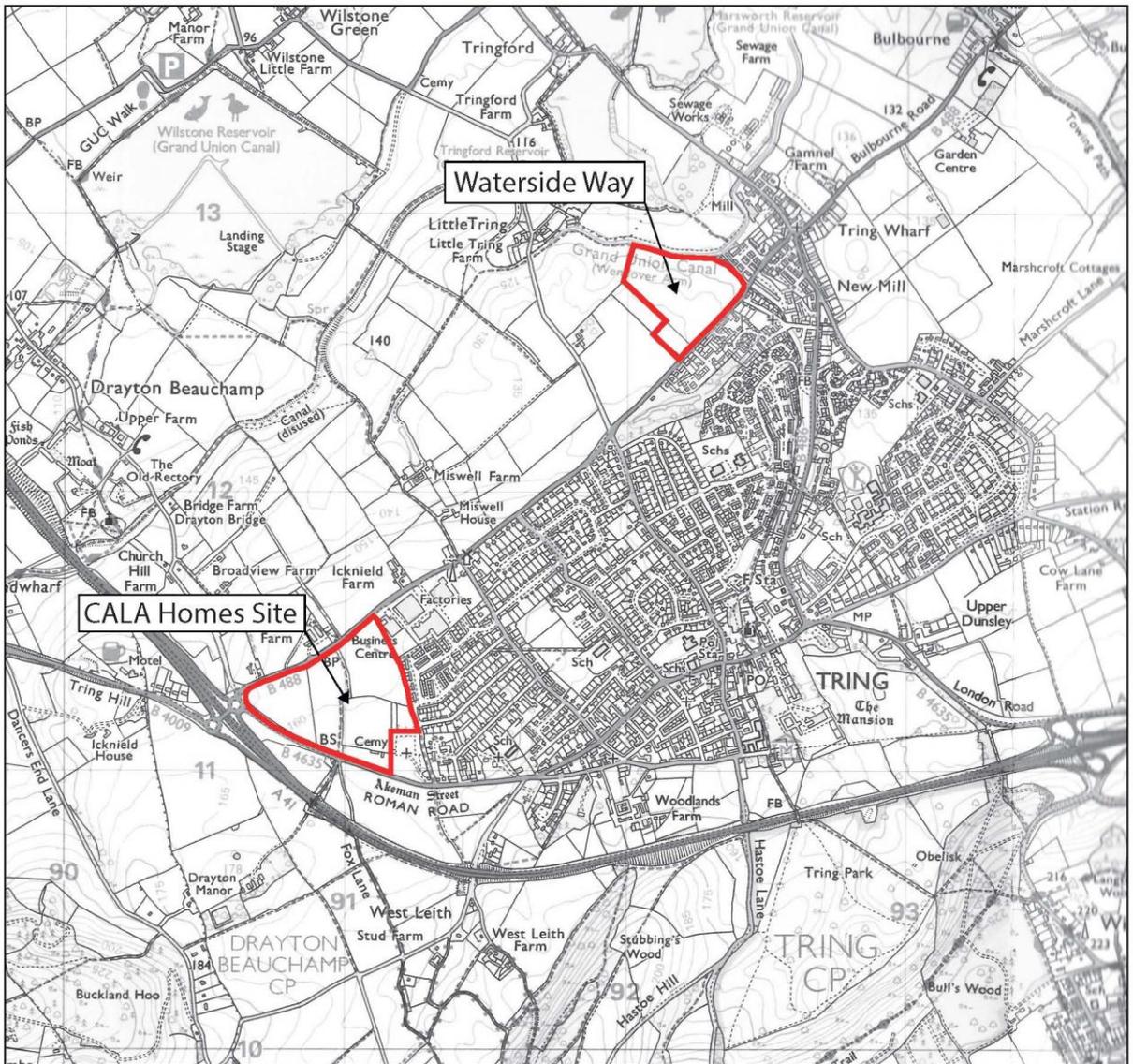


Section 2: Review of LVIA's

Introduction

- 2.1. A review was undertaken of both the Waterside Way site and the CALA Homes site situated to the north and west of Tring respectively see **Figure 2.1** below. The nature of each site is outlined below, as well as the structure and content of each report.

Figure 2.1 Location Plan showing the CALA Homes and Waterside Way Sites



- 2.2. Waterman Energy, Environment and Design Ltd was instructed by Waterside Way Sustainable Planning Ltd to undertake a landscape and visual appraisal of land at Waterside Way. The Site is located to the north of Tring and covers an area of approximately 9.5 hectares (ha). It is bordered by Waterside Way to the south and a short stretch of the Wendover Arm of the Grand Union Canal to the north. It is bounded by housing to the south and east, and is predominately rough grassland enclosed by mature and gappy hedgerows. It includes in the south western corner the football ground of Tring Corinthians Football Club, which is bounded to the west by a thin tree belt. The land slopes down from the south west to north east with a difference in level of approximately 10 metres. The site falls within Green Belt and lies adjacent to the Chilterns Area of Outstanding Natural Beauty (AONB), which bounds the edge of the Grand Union Canal. A Public Right of Way (PRoW) runs alongside the eastern boundary and follows the Grand Union Canal to the north.
- 2.3. The report covering the Waterside Way site is a landscape and visual appraisal and does not extend to a full Landscape and Visual Assessment (LVIA) of proposals for the development of the Site. The report summarises the desktop review and site survey, and provides an overview of designations and planning policies for the area. The report also describes the landscape character of its surroundings and local context, assesses the visibility of the site and identifies representative viewpoints informed by the findings of a GIS analysis (reviewing the topography and GIS Visual Context). Recommendations are made on the design principles to inform an emerging masterplan.

CALA Homes LVIA by Barton Wilmore

- 2.4. Barton Wilmore Landscape Planning and Design (BWLPD) was commissioned by CALA Homes South Ltd in May 2012 to undertake a LVIA for emerging proposals on a site to the west of Tring which covers an area of 17.6 ha. The site is agricultural land (a mix of arable and pasture) and includes six fields bounded by hedgerows and hedgerow trees. The B488 (Icknield Way) runs to the north of the site, whilst the B4635 runs along the site's southern boundary. The site is flanked to the east by Icknield Industrial Estate and a number of residential properties, as well as Tring cemetery to the south east. The site is located within Green Belt and the western most fields (F4 and F5) lie within the Chilterns AONB. In terms of topography it lies along the upper south facing slopes of a minor ridgeline associated with the Chiltern foothills and falls approximately 10 metres from the northern to southern boundary. Two PRoW cross the site. The site is identified as an allocated site within the Core Strategy referred to as LA5 under Local Allocations within the Dacorum's Pre Submission Core Strategy.
- 2.5. The report is a preliminary LVIA, prepared in advance of a developed masterplan. The report summarises the site context covering landscape and visual policy at national, regional to local level as well as reviewing landscape character assessments. The report then undertakes a site and visual appraisal, and explores the site's contribution to Green Belt purposes and the setting of the AONB. It outlines a series of landscape recommendations and determines the landscape and visual sensitivity, magnitude of change and significance, as well as residual effects associated with the proposed development.
- 2.6. A Statement of Common Ground has been prepared between the Council and CALA Homes, August 2012. The Statement of Common Ground states that the site was assessed during the emerging Core Strategy consultation (June 2009) and subsequently allocated under Policy LA5 in the Pre Submission Core Strategy (October 2011). The Pre Submission Core Strategy identifies that the site would accommodate "*around 150 new homes. Playing fields and open space. Extension to the employment area in Icknield Way Industrial estate. Potential extension to the cemetery*" (para 4.4). The Council has prepared an "Assessment of Potential Local Allocations and Strategic Sites" (June 2012) (Examination Document HG15) and the conclusions are that "*if development was properly planned, the impact on the compact character of the town and the*



Green Belt would be limited" (para 4.3). The Statement goes on to state that as a starting point for the masterplan framework a LVIA will be prepared and the Core Strategy development principles will be adhered to. *"The Core Strategy's development principles for the site, to include the provision of a mix of two-storey housing, which is designed to create a soft edge with the AONB, and to secure a defensible long term Green Belt boundary"* based on a number of design principles (para 10.1).



Section 3: Analysis of the CALA Homes

Introduction

- 3.1 An analysis of the CALA Homes LVIA was undertaken based on the development of a set of specific criteria drawn from "Guidelines for Landscape and Visual Impact Assessment" Second Edition, Landscape Institute/Institute of Environmental Management, 2002 (GLVIA). Criteria were divided under the following headings of a typical LVIA report:
- Introduction and methodology;
 - Description of the proposed development;
 - Baseline studies;
 - Identification and assessment of landscape and visual effects; and
 - Presentation of findings.
- 3.2 **Table 3.1** included within **Appendix 1** outlines the criteria and includes a brief commentary by the reviewers.



Section 4: Assessment of Landscape & Visual Concerns, Comparison of Sites and Conclusions

Introduction

- 4.1 This section summarises the landscape and visual concerns associated with the CALA Homes site, compares issues between both sites and summarises key conclusions.

Assessment of landscape and visual concerns associated with the CALA Homes site

- 4.2 Drawing on the findings from analysis of the CALA Homes Site (detailed in Section 3 and **Appendix 1**) the following provides a summary of the key areas of concern relating to the LVIA.

Introduction and methodology

- 4.3 Whilst the LVIA report is comprehensive there needs to be clear links between the LVIA report and the methodology covered in Appendix 4. No reference is given to the qualifications and experience of those responsible for undertaking the report, and there is no information covering the constraints and data deficiencies associated with the study. Equally there is no glossary of terms and some of the statements within the methodology require further qualification.

Description of the proposed development

- 4.4 Whilst a detailed description of the site is provided, no information is given on the nature of the development and its relevance in terms of landscape and visual impacts. Only potential effects during construction are considered within Appendix 4, and little information is provided on mitigation measures. Whilst it is acknowledged that the LVIA has been prepared in advance of an emerging masterplan, it is clear from the Core Strategy that some proposals have been considered for the site. The report would have benefited from a clear statement of assumptions on which the assessment is based especially the visual assessment.

Baseline

Landscape Character

- 4.5 As part of the assessment process the overall context within which the site sits should be assessed; the site should not be viewed in isolation. Whilst it is accepted that references are made to the national and local landscape character assessment, and landscape features or characteristics (para 3.8 of the main report) further information should be provided for instance on the built form of Tring and surrounding landscape context. This understanding will inform an analysis of the landscape characteristics and features and an assessment of the local character of the site and how it integrates into its surroundings.



Visual amenity

Viewpoint selection and receptors

- 4.6 The report lacks a Topographic Plan and first sieve GIS Visual Analysis in the form of a Zone of Theoretical Visibility to inform the selection of viewpoints and define the visual envelope of the site (the extent to which the Site may be visible from). Whilst it is acknowledged in Section 9: Next Steps para 9.2 that this will be undertaken based on built form and building heights, a first draft would have helped justify the viewpoints selected.
- 4.7 Equally, clear referencing throughout the report and supporting appendices would assist the reader in understanding the proximity of the visual receptor to the photographic viewpoint as per Table 2 as opposed to Appendix 5 where only the visual receptors are referred to and assessed. Whilst we understand that the "*views are representative of visual receptors in the landscape*" (para 4.3), from some locations where there are visual receptors i.e. Buckland (R16 and L4), and R6 properties on Beaconsfield Road and Longfield Gardens, there are not representative photographic viewpoints.

Composition of immediate views

- 4.8 It should be noted that in recording the site annotations for some of the near distance viewpoints i.e. the immediacy of the Chilterns AONB within the composition of the view is either not identified or not emphasised sufficiently. The Chilterns and Tring scarps forms important backdrop to the composition to many of the photographic viewpoints.

Identification and assessment of landscape and visual effects

Determination of significance

- 4.9 We would question why the assessment of significance on landscape character gives no consideration of the impact the proposal may have on the surrounding landscape and townscape and merely refers to the impact of the development proposal on the national character area, local character area and site specific landscape.
- 4.10 Equally it is unclear why site features are assessed separately from landscape character, and presented under Table 1: Site Appraisal and Landscape Recommendations according to Hedgerows (H1-12), Tree Belts (TB1-6) and Verges (V1-2), whilst as part of the assessment, all site features are grouped together resulting in an aggregation of scoring. In addition, it is unclear why the key features of the site are not assessed against surrounding landscape features/characteristics; are the hedgerows and tree belts on site important in terms of connecting with the surrounding landscape and what are the key features/characteristics of the surroundings which can be reflected in the site's development?
- 4.11 Similarly we are uncertain why the overall visual sensitivity of the site "*is assessed as moderate...*" para 4.3 and question whether below this score there was a sub set of sensitivity scores not presented for each of the internal photographic viewpoints, whether this sensitivity score is an amalgamation of scores associated with different visual receptors or whether the LVIA regards visual receptors as sensitive or just the site; accepting that a sensitivity score has been attributed to visual receptors within Appendix 5?
- 4.12 In terms of the visual assessment it is unclear why some of the significance scores outlined in Appendix 5: Visual Effect Table would change so dramatically over the course of a 25 year period from high/medium adverse on completion of the development in year 1 to a high/medium beneficial score in year 25 merely based on the maturation of planting (i.e. R14 in Appendix 5). The LVIA states under para 7.14 that the "*landscape proposals mature the views towards Tring will be improved by the enhanced hedgerows and improved urban edge. The significance of these slight visual benefits will be moderate beneficial due to the sensitivity of the receptors.*" Whilst we accept



there will be an improvement in time due to planting, the assessor should work from the baseline which will change irrespective of planting. In terms of scoring consideration should have been given for a neutral rather than a high/medium beneficial score in year 25.

- 4.13 We would question whether the CALA Homes LVIA should have defined the significance of the development in terms of visual and landscape effects without information on the proposed development and a clear understanding of the potential impacts associated with the construction and operation of the development. We perceive that this report should be more of an appraisal, with recommendations to inform the development rather than trying to determine the significance before there is a full understanding of what form of development will take place on the site.

Mitigation measures

- 4.14 Mitigation measures are mentioned but little information is provided apart from in Appendix 4: Methodology for Landscape and Visual Assessment.

Presentation of findings

- 4.15 Layout of some of the plans is confusing to read particularly Figure 3 Visual Appraisal Plan. In addition, a lack of a topographic plan and first sieve GIS analysis inhibits the reader understanding how viewpoints were selected. In addition, the wide fields of view for some photographs i.e. 5, 6 and 11 does not reflect the view as experienced, resulting in a loss of depth and changing how the Chilterns AONB is perceived as part of the backdrop to the photographs composition.

General points

Openness

- 4.16 The LVIA under para 3.11 recommends that the development of Fields F4 and F5 should be maintained "*as open space so as to maintain and improve the existing AONB landscape character within the Site*". This is reiterated in para 5.44 which adds that these fields in terms of Green Belt should be "*restricted to development appropriate to Green Belt land which would maintain a sense of openness in the landscape in accordance with the National Planning Framework*."
- 4.17 Whilst we agree in principle within the need to retain F4 and F5 for a sense of openness associated with the Green Belt and retain their open space in terms of their visual relationship with the AONB's landscape character, we would argue that the site (including the remaining fields F1- F3) is equally visible particularly from photographic viewpoint 13 and 15 as illustrated below. This reflects comments made in the Landscaper Character Assessment for Dacorum Borough Council, May 2004 para 2.74 which states that the "*character area is described as being widely visible from surrounding areas and in particular from the scarp slopes and plateau edge to the south*."



Photograph 13 (CALA Homes site)





Photograph 15 (CALA Homes site)

Comparison of both sites

- 4.18 Based on the criteria headings outlined in Section 3, Table 4.1 compares the key issues between both sites:

Table 4.1 Comparison of both sites

Criteria	CALA Homes	Waterside Way Site
Introduction and Methodology	No clear links are made between the report and the methodology until later in the report, under Section 7. No visual envelope or ZTV has been prepared to justify the selection of photographic viewpoints.	Given the report is an appraisal it does not include a detailed explanation on the methodology. A Topographic Plan and GIS Visual Analysis was prepared to inform the selection of photoviewpoints.
Description of the proposed development	Whilst a detailed description of the site is provided, no information is given on the type of development likely to occur. Given that the site is allocated and various LPA policies detail the nature of the site, the report should at least contain some assumptions/statements which would help in explain why certain judgements have been made in terms of visual significance. Only potential effects during construction are considered within Appendix 4.	A detailed description of the site is provided, but there is no information on the development - this is inevitable given that the report is only appraisal and undertaken prior to the finalisation of a masterplan. No information is provided on the type of development and likely effects associated during construction and operation since this is only an appraisal.
Baseline Studies: Landscape and Visual Policy	The Site lies within the Green Belt. The furthest two fields to the west (F4 and F5) lie within the Chilterns AONB).	The Site lies within the Green Belt. The site borders the Chilterns AONB which lies to the north to the Grand Union Canal.
Baseline Studies: Landscape Character	The site appraisal focuses on site features and landscape character as two separate elements and does not take into consideration the wider setting around the site or highlight	The landscape character context is clearly described as well as the relationship of the site to its surroundings. The site marks a strong contrast with the adjacent landscape

Criteria	CALA Homes	Waterside Way Site
	important key features/characteristics of the surrounding landscape/townscape.	character of Tring Reservoirs to the north.
Baseline: Visual Amenity	<p>Viewpoint selection: Recognising that a ZTV will be prepared as part of the second LVIA report it is unclear from the report how photographic viewpoints were selected and the extent of the visual envelope.</p> <p>Composition: The visual prominence of the Chilterns AONB is far more apparent following a site visit than is reflected on the photographic viewpoints and we question whether as a result of a wide field of view in some images the image has been stretched resulting in the loss depth of the image. In addition, the position from which photographs were taken is questionable; for instance photograph 3 if a few metres along the PROW would result in a full view of the site, and photograph 7 if taken adjacent to Beeches Farm would result in a view of field F4 which forms part of the site.</p>	<p>Viewpoint selection: The selection of photoviewpoints was informed by a Topographic Plan and GIS Visual Analysis/ZTV.</p> <p>Composition/extent: The assessors agree with the photoviewpoint descriptions and descriptions cover the extent of visibility and composition of the view.</p>
Identification and assessment of landscape and visual effects	<p>The report undertakes a preliminary assessment of landscape and visual significance.</p> <p>Determination of significance: We would question why the assessment of significance on landscape character gives no consideration of the impact the proposal may have on the surrounding landscape and townscape and merely refers to the impact of the development proposal on the national character area and local character area (which does not provide an in-depth characterisation of the urban edge of Tring).</p> <p>Aggregate scoring: In addition it is unclear why site features are assessed separately from landscape character and the features grouped together as an aggregate score. Equally it is unclear why the site is given an overall visual sensitivity score of</p>	<p>None identified as the report is only an appraisal and not a full assessment.</p> <p>The report does include a set of recommended landscape development principles.</p>



Criteria	CALA Homes	Waterside Way Site
	<p>moderate when certain areas of the site as per Figure 4: Landscape Development Principles Plan are deemed to be visually sensitive owing to their prominence, openness, visibility etc.</p> <p>Furthermore on maturity the report states that the “development will result in a long term slight benefit to the Tring Gap Foothills through the enhancement of the Tring urban edge and its setting within the AONB landscape” para 7.8 with a score of high/medium adverse in year 1 and a high /medium beneficial score in year 25. This is based on the maturation of planting and does not appear to consider that the development is starting from the premise that it will intrude into the countryside and AONB.</p> <p>Mitigation measures: Mitigation measures are mentioned but little information is provided apart from within the Appendices, which is expected given the lack of an emerging masterplan. There are however detailed landscape recommendations through the report and some mitigation proposals are indicated on Figure 4: Landscape Development Principles Plan.</p>	
Presentation of findings	<p>The report would benefit from further cross referencing particularly to Appendix 4, a topographic plan and ZTV. It lacks of a Topographic Plan and first sieve GIS visual analysis or ZTV to inform how viewpoints were selected. The clarity of some figures could be improved i.e. Figure 3 Viewpoint Analysis Plan.</p>	<p>The findings are presented in a clear and logical format informed by the accompanying plans.</p>

Conclusions

4.19 Key conclusions arising from the review are as follows:

- The CALA Homes LVIA has not undertaken a local landscape character assessment. Whilst some features such as hedgerows, trees and the nature of fields have been identified, it is not clear within the assessment how these site features/characteristics connect and interrelate



with the surrounding landscape, nor does the assessment determine which features/characteristics are important and why;

- Little consideration is given in the CALA Homes LVIA as to how the development proposal may impact on the special qualities of the Chilterns AONB landscape character or whether the site reflects any of the special qualities of the AONB; be this its hedgerows, tree belts etc;
- The CALA Homes LVIA may be better suited to the purpose of an appraisal rather than a full LVIA, which highlights the opportunities and constraints relating to the site rather than assessing the landscape and visual significance of a site where the development proposals have yet to be finalised;
- The CALA Homes site is open and visually prominent from a select number of viewpoints within the foothills of the Chilterns AONB (i.e. viewpoint 13 and 15) as well as points within the immediate vicinity of the site. Views of the Chilterns AONB form an important part of the visual composition. Whilst proposals have been put forward as part of the Landscape Development Principles Plan (Figure 4) to maintain views towards the Chilterns escarpment we question how such views will be maintained as part of the development when a mix of residential and industrial units are erected;
- By comparison the visual envelope of the Waterside Way site is restricted to the immediate surroundings with open views only obtainable from Icknield Way and the Grand Union Canal. The site when viewed from the foothills of the Chilterns AONB (Photoviewpoint 12 from the Waterside Way site report as well as viewpoint 13 from the CALA Homes) is not visible; well concealed by the urban context and surrounding vegetation;
- In terms of the CALA Homes LVIA, the assessment of visual and landscape impacts is unclear and in some cases the terminology used is incorrect. Evidence to support how the national and local character areas have been given a landscape sensitivity score is undefined as well as how photographic viewpoints to inform the visual assessment have been determined. The scoring of some of the residual impacts associated with visual receptors detailed in Appendix 5 of the CALA Homes LVIA appears high especially in relation to year 25 and on the basis of a maturation of planting. The assessor should start from the premise that there will be an inevitable change in the baseline, which for example, may result in a neutral score rather than a high/medium beneficial effect following planting in year 25; and
- Little consideration has been given to the relationship or impact the CALA Homes site will have on its immediate surroundings, apart from at a national or local character level. One of the only statements referring to the urban edge is in para 8.1, which states that *“due to the Site’s relationship with the existing hard urban edge of Tring and the effect of detracting urban elements on the existing landscape character, the landscape and visual appraisal identifies that the Site has the capacity to accommodate and appropriate amount of change in the context of the adjacent urban edge with the potential to improve the condition and setting of the AONB”*. In addition, we would also dispute the fact that the landscape character of the site is adversely affected by detracting elements associated with the B488 / B4009 roundabout, the traffic and elements along the B488 and the B4635; visibility of these detractors in summer appears low. By comparison due to the topography and direct visual connectivity with properties immediately south of Icknield Road, the Waterside Way site has a strong relationship with the urban edge of Tring rather than the landscape character of the Chilterns AONB to the north of the canal.



Appendix 1: Table 3.1 Critique of the CALA Homes LVIA



Appendix 1: Table 3.1: Critique of the CALA Homes LVIA

ASSESSMENT CRITERIA	CALA HOMES LVIA
<p>Introduction and Methodology</p> <p><i>The remit, qualifications and experience of those responsible for preparing the assessment must be identified</i></p>	<ul style="list-style-type: none"> • Within Section 1: Introduction para 1.1 reference is made to the company commissioned to undertake the work and the remit, but no reference is given to the qualifications and experience of those responsible: <i>“Barton Willmore Landscape Planning and Design were commissioned by CALA Homes in May 2012 to undertake a Landscape and Visual Impact Assessment for emerging proposals for the land to the west of Tring...”</i>. This point is reiterated in Appendix 4 Methodology of Landscape and Visual Assessment which states that <i>“it is recommended that suitably qualified and experienced landscape professionals carry out landscape and visual impact assessments.”</i> Further information on the objectives of the LVIA are covered in para 1.3.
<p><i>The methodology used must be clearly described including the overall assessment process, links to scheme design, specific techniques used with clearly defined and agreed terminology. Information should include details of consultations, guidelines, checklists, best practice examples of similar projects where appropriate, and consider the types of impacts (positive or negative, cumulative, short term, long term, permanent/temporary direct/indirect)</i></p>	<ul style="list-style-type: none"> • Reference is made in Section 1: Introduction para 1.2 to the nature of a landscape assessment and visual assessment, however there is no reference to Appendix 4 (which outlines the methodology) until Section 7: Likely Landscape and Visual Effects para 7.2 which states that the methodology used is <i>“included at Appendix 4 of this report and takes account of the Aylesbury Vale District Council (AVDC) Landscape and Visual Impact Assessment Guidance Notes and incorporates the AVDC Significance of Effects Tables.”</i> • Within Appendix 4: Methodology of Landscape and Visual Assessment reference is made to “Guidelines for Landscape and Visual Impact Assessment” Second Edition, 2002 as well as Aylesbury Vale District Council’s guidance (para 1) and other relevant documents including Circular 01/09 on photography and ILE Guidance Notes for the Reduction of Obtrusive Light” (para 22 and 27 respectively). • Specific reference is made to the type of impacts associated with development in para 12 and para 32 within Appendix 4. • No glossary of terms is included within the appendices.
<p><i>Reasoned criteria, thresholds and judgments for evaluating the significance of effects must be explained</i></p>	<ul style="list-style-type: none"> • Appendix 4: Methodology for Landscape and Visual Assessment outlines the criteria for evaluating landscape value and condition (note typo condition is referred to as character) which informs landscape sensitivity to change, and includes threshold tables covering significance of landscape and visual impact as well as explanations on the methodological approach. • We would however question some of the

ASSESSMENT CRITERIA	CALA HOMES LVIA
	<p>statements within the methodology. Para 35 for instance states that the net visual effect of these factors (its nature of proposals, its siting in the landscape, its size, detailed design and the positioning and distance from which it is viewed) <i>“is that the visual impact of an object will begin to fall away with increasing distance....”</i> We consider that the terminology of the term “impact” is incorrect and that the point is an oversimplified generalisation.</p>
<p><i>Scope of the assessment, key issues, how these were determined and any constraints and data deficiencies that may apply must be explained</i></p>	<ul style="list-style-type: none"> The scope of the assessment is defined under a set of objectives covered in para 1.3. No information is included within the report covering any constraints or data deficiencies, though Section 9: Next Steps does explain that further work needs to be undertaken. We are assuming that based on Appendix 4 further photographs will be taken in winter to represent the worst case scenario.
<p>Description of the proposed development</p>	
<p><i>A description of the environment as it is and how it would develop if the project did not proceed</i></p>	<ul style="list-style-type: none"> Information on the nature of the Site is covered under Section 2: Site Context para 2.1 to 2.15 which describe the site location, topography, vegetation and habitats, public rights of way, listed buildings and conservation areas. Further information on the site specifically is covered under Section 3.0: Site Appraisal.
<p><i>A clear description of the purposes and objectives of the development covering the basic elements of the development of relevance to the landscape and visual assessment</i></p>	<ul style="list-style-type: none"> No description is given within the LVIA as to the nature of the development proposals and its relevance in terms of potential landscape and visual impacts. It is understood from reviewing the report that proposals are emerging and dependent upon a finalised masterplan and detailed landscape strategy (para 7.1) whereupon a revised LVIA will be prepared. However further information on the nature of the development could have been drawn from Dacorum’s Pre Submission Core Strategy Policy LA 5 or at least a list of statements/assumptions on the nature of the development covering for instance 150 dwellings, public open space and an extension to the industrial estate.
<p><i>The land affected should be clearly marked on a map and different land uses of this area clearly demarcated</i></p>	<ul style="list-style-type: none"> The site is identified on Figure 2: Site Appraisal Plan which outlines the boundary, contours, PROW, vegetation and land use as well as the location of internal site photos.
<p><i>The landscape constraints and opportunities must be clearly defined</i></p>	<ul style="list-style-type: none"> Landscape opportunities and constraints are identified under the following headings with a number of recommendations, as well as on an initial Landscape Development Principles Plan (Figure 4): <ul style="list-style-type: none"> Section 2: Site Context, para 2.64 in terms of landscape planning policy. Section 3: Site Appraisal Table 1 covering landscape recommendations to landscape character, para 3.11 in



ASSESSMENT CRITERIA	CALA HOMES LVIA
	<p>relation to the enhancement to the condition of, and setting to the Chilterns AONB.</p> <ul style="list-style-type: none"> ○ Section 4: Visual Appraisal Table 2: Contribution of the Site to setting of AONB within the views as well as within Summary of Visual Appraisal para 4.28-4.34. ○ Section 5: Site's Contribution to Green Belt Purposes para 5.4. ○ Section 6: Landscape recommendations para 6.1 and associated bullet points.
<p><i>Potential effects associated with construction and operation must be identified and evaluated</i></p>	<ul style="list-style-type: none"> • No information is provided within the report on the potential effects associated with construction and operation, and only brief mention is made within Section 7: Likely Landscape and Visual Effects (para 7.3, 7.4, and 7.11) to the changes which would occur on site features, landscape character and visual amenity at construction stage. • Equally only mention is made in Appendix 4: Methodology for Landscape and Visual Assessment to landscape and visual effects during construction.
<p><i>Alternatives must be considered where practical and appropriate, considering their advantages and disadvantages and reasons for the preferred option</i></p>	<ul style="list-style-type: none"> • Appendix 4: Methodology for Landscape and Visual Assessment states under para 6 that “<i>due to the existing allocation of the Site within the Core Strategy there has not been a requirement to assess alternative sites (Stage 1).</i>”
<p><i>Mitigation proposals as part of the development proposal and prior to the assessment must be referred to</i></p>	<ul style="list-style-type: none"> • Little information is provided on the emerging development proposals mitigation measures which refers to year 1 and year 25 planting growth levels (see para 7.4 to 7.5, 7.7 to 7.8 and 7.11 to 7.12). Mention is made throughout the report to landscape recommendations which should be considered as part of proposals. These include infilling gaps, reinforcing with native stock and tree planting, improving the urban edge, retaining and managing appropriate offsets, replacing and planting new native hedgerow with trees as well as the protection of existing trees root systems (see Table 1 Site Appraisal and landscape recommendations, para 3.11, Table 2: Contribution of the Site to setting of AONB in views, para 4.34, Section 6: Landscape Recommendations and Figure 4 Landscape Development Principles Plan). • Appendix 4: Methodology for Landscape and Visual Assessment refers to the need to consider mitigation measures. It stipulates their nature, measures to minimise likely negative (adverse) effects, offers guidelines for mitigation and common measures. • Appendix 5: Land West of Tring Visual Effect Table does include within its notes reference to the enhancement of hedgerows through planting and provision of open space setback.



ASSESSMENT CRITERIA	CALA HOMES LVIA
Baseline Studies	
<p><i>Information on relevant landscape and visual planning and legal context including published policies and guidance on designations must be outlined</i></p>	<ul style="list-style-type: none"> • This is covered in Section 2: Site Context which details landscape and visual policies relevant to the site at a national, regional to local level. Reference is made to Figure 1: Site Context Plan which delineates designations as well as National Character Areas, Appendix 2 which includes extracts of the Landscape Character Assessment for Dacorum, May 2004 and Appendix 3 covering extracts of Aylesbury Vale Landscape Character Assessment, May 2008 and which outlines the landscape character areas to the northwest, south and south west of the Site. • Clear cross referencing from the LVIA report to the Green Belt and Chilterns AONB designation on Figure 1: Site Context Plan would have been beneficial.
<p><i>Landscape Baseline Review: There must be a clear description and assessment of individual elements, features and characteristics of the landscape and their value/importance, an analysis of how these components interact considering landscape character, condition value and enhancement potential</i></p>	<ul style="list-style-type: none"> • A landscape baseline review is covered in Section 3: Site Appraisal and Figure 2 Site Appraisal Plan. Section 3 summarises the site features, their condition and value in the context of the site's landscape character and lists a series of recommendations. • The LVIA would benefit from a note confirming whether it agrees with the landscape character assessments (particularly Dacorum Landscape Character Assessment which does cover the site) and should consider from a local context the nature of the landscape/townscape surrounding the site including Tring itself, only covered under brief references i.e. para 8.1.
<p><i>Visual Baseline Review: The study area must be defined and the desk study must clearly explain the nature of visual amenity along with approximate visibility of the development and potential visual receptors. The field survey must confirm the extent of visibility, representative viewpoints and visual receptors.</i></p>	<ul style="list-style-type: none"> • The LVIA details within Section 4: Visual Appraisal a number of site context photographs grading them into near, middle and long distance views, the degree of visibility from each viewpoint is described as well as a brief summary of the composition and extent of view associated with each photographic viewpoint. Visual receptors associated or close to each viewpoint are listed within Table 2 along with an assessment of the contribution the site makes to the setting of the AONB within the view, as well as landscape recommendations. It should be noted though that not all visual receptors include an associated photographic viewpoint (i.e. R16 and L4). • Whilst the LVIA states that the site context photographs were selected on the "ability to gain views towards the vicinity of the Site and serve to illustrate its visibility in association with the wider Green Belt and countryside setting and the Chilterns AONB" there is no explanation as to how the extent of the study area was defined. Equally viewpoints should be determined (based on for instance a topographical plan and first sieve Zone of Theoretical Visibility) and then verified in the field, reflected in part within Appendix 4:



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	<p>Methodology of Landscape and Visual Assessment which states under para 17 that the “<i>area of study for the visual assessment may extend to the whole of the area from which the Development Site and its proposed scheme is visible (the visual envelope or zone of visual influence)</i>”. The Appendix goes on to state under para 18 that “<i>the approximate visibility of the Development Site as existing should be determined through topographical analysis, and the actual extent of visibility checked in the field to identify and take account of the localise screening effects of buildings, walls, fences, trees, hedgerows and banks.</i>” Reference is made to the fact that a Zone of Theoretical Visibility will be prepared (para 20) once there is more detail on the proposed development.</p> <ul style="list-style-type: none"> • Appendix 4 also states under para 22 that “<i>the extent of which the Site is visible from the surrounding area is confirmed, identifying the views into/towards the Site, identifying specific elements such as landform, buildings or vegetation which interrupt, filter or otherwise influence views, and illustrating the findings on the Visual Appraisal Plan</i>”. It would be beneficial if this was presented graphically defining the visual envelope. • It was clear from a brief review of photographic viewpoints in the field that given the nature of the topography the site would not be visible from many of the long distance views selected (i.e. photographic viewpoint 19, 20, 21 and 22) and in some instance the reviewers questioned whether an alternative viewpoint could have been chosen on higher ground, where the site may be more visible. • Equally the visual prominence of the Chilterns AONB is far more apparent following a site visit than is reflected on the photographic viewpoints and as a result we question whether as a result of a wide field of view of some of the photographs the image has been stretched resulting in the loss depth of the image. • Whilst the nature of visual amenity, approximate visibility of the development and potential visual receptors is defined, the report would benefit from a clear list of statements/assumptions referring to the nature and scale of development as referred to in the Statement of Common Ground and a number of associated documents. • The report would benefit from clear links between the visual receptors and photoviewpoints listed as part of Table 2 within Section 4, within Figure 3 Visual Appraisal Plan and Appendix 5 Visual Effects Table.
<p>Identification and Assessment of Landscape and Visual Effects</p>	
<p><i>Identify systematically the likely effects of the development during construction and</i></p>	<ul style="list-style-type: none"> • As outlined above only construction impacts have been referred to in Appendix 4



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<p><i>operation and assess the nature and significance of these effects in a logical and well reasoned manner</i></p>	<p>Methodology of Landscape and Visual Assessment para 50.</p> <ul style="list-style-type: none"> • A brief assessment of the landscape and visual sensitivity, magnitude of change and significance is covered in Section 7: Likely landscape and visual effects with further information in Appendix 5: Visual Effects Table (which also includes an assessment of residual effects in year 25). The LVIA in para 7.1 states that an <i>“initial assessment of the likely landscape and visual effects has been carried out...”</i> and that the <i>“assessment of effects should be reviewed and finalised once a masterplan and detailed landscape strategy for the Site has been developed. However the description below provide(s) a guideline of the significance of anticipated effects assuming that the above landscape recommendations are followed.”</i> • We would question why the assessment of significance on landscape character gives no consideration of the impact the proposal may have on the surrounding landscape and townscape and merely refers to the impact of the development proposal on the national character area and local character area which does not provide an in depth characterisation of the urban edge of Tring. • Equally it is unclear why site features are assessed separately from landscape character, and presented under Table 1: Site Appraisal and Landscape Recommendations according to Hedgerows (H1-12), Tree Belts (TB1-6) and Verges (V1-2), whilst as part of the assessment, all site features are grouped together resulting in an aggregate score. In addition, it is unclear why the key features of the site are not assessed against surrounding landscape features/characteristics; are the hedgerows and tree belts on site important in terms of connecting with the surrounding landscape? • In terms of the visual assessment it is unclear why some of the significance scores would change so dramatically over the course of a 25 year period from high/medium adverse on completion of the development in year 1 to a high/medium beneficial score in year 25 merely based on the maturation of planting (i.e. R14 in Appendix 5).
<p><i>Indicate measured proposals to avoid, reduce, remedy or compensate for those effects (mitigation measures) Significant adverse impacts should be considered for mitigation and specific mitigation measures put forward where practicable – where assumptions are made on the effectiveness of measures these should be stipulated</i></p>	<ul style="list-style-type: none"> • Whilst reference is made in Appendix 4: Methodology for Landscape and Visual Assessment to the purpose of mitigation and landscape mitigation measures are mentioned within Section 7: Likely Landscape and Visual Effects further to landscape recommendations outlined within the report (and which are assumed will be incorporated into the masterplanning process) little is covered on specific mitigation measures. It is assumed



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	<p>that this is due to the lack of information available on the masterplan at this stage. References cover estimated growth levels of planting from year 1 to 25 detailed in Appendix 4: Methodology of Landscape and Visual Assessment, and covered briefly in para 7.4 to 7.5, 7.7 to 7.8 and 7.11 to 7.12.</p> <ul style="list-style-type: none"> Appendix 5: Land West of Tring Visual Effect Table also includes within its notes reference to the enhancement of hedgerows through planting and provision of open space setback.
<p><i>Landscape effects: Consideration should be given to the sensitivity of the landscape resource, the scale/magnitude of landscape effect and significance as well as the identification of residual effects after further mitigation proposed through the LVIA</i></p>	<ul style="list-style-type: none"> This is reflected in Section 7: Likely Landscape and Visual Effects, however for the reasons stipulated above we would question how decisions have been made and whether the assessment is too simplistic in merely considering the site itself, and not the impact of the development on its immediate surroundings.
<p><i>Visual effects: Consideration should be given to the identification of effects, sensitivity of visual receptor, scale or magnitude of visual effects and significance as well as the identification of residual effects after further mitigation proposed through the LVIA</i></p>	<ul style="list-style-type: none"> This is covered in Section 7: Likely Landscape and Visual Effects with further information in Appendix 5: Visual Effects Table. We would question some of the broad brush statements such as para 4.33 and why such scores appear to be aggregated when under para 3.10 there is a scoring of sensitivity ranging from high to low; <i>"the overall visual sensitivity of the Site is assessed as moderate due to the extent of its visibility in the context of the wider undulating wooded landscape associated with the AONB, the number of receptors which are afforded views and the scope for mitigating the potential visual impacts on these receptors."</i> It is unclear why the site is given an overall visual sensitivity score of moderate when certain areas of the site as per Figure 4: Landscape Development Principles Plan are deemed to be visually sensitive owing to their prominence, openness, visibility etc. Equally as referred to above, we would question why some of the significance scores would change so dramatically over the course of a 25 year period from high/medium adverse on completion of the development in year 1 to a high/medium beneficial score in year 25 merely based on the maturation of planting (i.e. R14 in Appendix 5). In addition we would question the statement in para 7.14 which states that as the <i>"landscape proposals mature the views towards Tring will be improved by the enhanced hedgerows and improved urban edge. The significance of these slight visual benefits will be moderate beneficial due to the sensitivity of the receptors."</i> Whilst we accept there will be an improvement in time, the assessor should surely start from the premise that the development will encroach into the open countryside and result in the loss of the urban fringe/countryside surrounding the town,



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	changing the character of the site permanently.
Presentation of findings	
<p><i>The text needs to be impartial, to the point with definitions provided supported by a glossary of terms and full references. Minimal technical terms should be used.</i></p>	<ul style="list-style-type: none"> • The report should be clear in the fact that it is an initial appraisal and not a full LVIA based on a finalised masterplan. It is disjointed with some sections are not aligned to the Figures and Appendices i.e. para 2.16 on landscape policies relevant to the site would benefit from a reference to Figure 1 Site Context which shows the extent of the AONB and Green Belt designations. Direct reference should be made within the introduction to the methodology covered within Appendix 4 which informs the structure of the report. • A glossary of technical terms and full references would also be beneficial.
<p><i>Presentation of plans, figures and photoviewpoints</i></p>	<ul style="list-style-type: none"> • There are no plans showing the visual envelope or a clear topographical plan to support the selection of specific viewpoints. Whilst part of the reason behind this is explained under Section 9: Next Steps a first sieve GIS analysis and a figure showing the extent of the visual envelope overlaid on a clear topographic plan would illustrate why certain viewpoints were selected, and why some, it is assumed, have been identified to show no view at all. • Figure 1 (Site Context Plan) and Figure 3 (Visual Appraisal Plan) are both difficult to read over the wealth of other information provided. Figure 3 should be simplified to show location of viewpoints, type of view and type of receptor. • The series of photographs within the Site and showing the site context would both benefit from annotations beneath so the reader can directly relate to the image.

The criteria for informing this review was based on “Guidelines for Landscape and Visual Impact Assessment” Second Edition, Landscape Institute/Institute of Environmental Management, 2002 (GLVIA)

