

**Landscape Consultant's Response in
Respect of Landscape/Townscape & Visual Matters**

Related to

**Full Planning Application for up to 99no Residential Dwellings on Land at
Hogshaw Farm, Fairfield,
Buxton**

Local Authority Ref: HPK/2023/0192 (Revised Submission)

Barnes Walker Ref: M3708-LCR-24.10-V2

On behalf of

High Peak Borough Council

by

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Appendix 1 – Figures 1, 2, 3 & 4

1 Introduction

- 1.1 I am Nic Folland CMLI, and I am a Director and Landscape Architect at Barnes Walker Ltd, a Landscape Architectural practice based in South Manchester.
- 1.2 During my 31 years' experience, I have worked for two local authorities early on in my career (Manchester City Council and Knowsley Borough Council) and subsequently I gained a further 10 years of experience at 3 large multi-disciplinary consultancies. For the last 20 years I have worked at Barnes Walker Ltd and became a director in 2009.
- 1.3 Over the past 16 years in particular, I have gained experience in the design and landscape and visual assessment of residential development, which has been predominantly located in the North-West. I have prepared and presented evidence as an expert witness at over 30 Public Inquiries and appeal hearings on behalf of both appellants and Local Planning Authorities.
- 1.4 High Peak Borough Council (HPBC) has received a planning application for residential development on the northern edge of Buxton and the planning submission includes a Landscape and Visual Impact Assessment (LVIA), which determines the landscape and visual effects that the proposed development could generate upon the landscape (features and character) and upon the views people experience.

Background

- 1.5 To assist with their consideration of the original planning application in 2023, HPBC appointed Barnes Walker Ltd to undertake an independent review of the applicant's LVIA, which was prepared by Urban Green.
- 1.6 As a result, I prepared a consultation response on behalf of HPBC that was related to the landscape and visual matters associated with a full planning application by Barratt Homes Manchester for the construction of 116no residential dwellings upon land to the west of the A6, at Fairfield, Buxton (app ref: HPK/2023/0192).
- 1.7 In August 2024, the applicant submitted a revised application for 99 dwellings and this document comprises a second, revised iteration of my previous consultation response undertaken for the initial submission in 2023.

Independence

- 1.8 To confirm, Barnes Walker Ltd has not been involved in the proposed housing scheme, and has no relationship with either supporters of, or objectors to it, nor with the developer and their consultant landscape architects, or any landowners or local residents.

My Approach

- 1.9 My review comprises two key elements, first being a consideration of the method adopted by Urban Green in preparing the LVIA and second to consider whether I concur with the results of their assessment.
- 1.10 Following an instruction from Rachel Simpkin (HPBC Senior Planning Officer – Majors and Commercial), I undertook an initial review of the relevant submitted documents, which were submitted with the planning application, prior to preparing this Consultation Response.

LVIA Guidance

- 1.11 The Landscape Institute (LI) and the Institute of Environmental Management and Assessment (IEMA) have produced Guidelines for Landscape and Visual Impact Assessment. It is currently in its third edition (since 2013) and is often referred to as GLVIA3.
- 1.12 This guidance is accepted as the industry standard for the assessment of landscape and visual effects associated with development projects. The guidance is not prescriptive, however it does provide a series of overarching principles and detailed recommendations.
- 1.13 Larger, more complex development proposals, or those which are set in sensitive environments, are often subject to the Environmental Impact Assessment (EIA) regulations, which means that associated planning applications require more detail regarding the predicted environmental effects. In these circumstances a fuller form of Landscape and Visual Impact Assessment (LVIA) is usually required as part of an overarching Environmental Statement (ES). ES documents often incorporate the assessment of a broad range of environmental effects, which can include highways, noise, air quality, hydrology etc along with landscape and visual.
- 1.14 Schemes with a reduced level of complexity and or scale, such as this application, are often supplemented by a standalone LVIA or Landscape and Visual Appraisal (LVA).
- 1.15 The level of assessment undertaken can vary from application to application. As an example, a fuller LVIA undertaken as part of an ES may include construction effects, operational (Year 1) effects, longer term (Year 15 or 'residual') effects and cumulative effects, whereas a LVA may just consider Year 1 effects.

Documents Studied

1.16 In preparing this response, the key document of reference was the submitted LVIA by Urban Green, however the following documents from the applicant's revised planning application were also considered:

- Arboricultural Impact Assessment and Method Statement;
- Design and Access Statement;
- General Arrangement Plan;
- Planning Layout;
- Soft Landscape Plans 1, 2, 3 and 4 of 4;
- Storey Heights Plan; and
- Response to Urban Design Comments.

1.17 The Response to Urban Design Comments document by e*scape urbanists provides a useful summary of the key changes that have been made within the resubmitted planning application as follows:

- *Reduction in the number of houses from 116 to 99 in order to retain existing TPO trees, reduce the level of frontage parking and minimise the extent of retaining structures required;*
- *Revised north-west corner of the site to avoid 30m badger offset;*
- *Chimneys added to some plots to provide additional references to local vernacular and create more interesting/varied roofscape;*
- *Repositioning of some plots to reduce the amount of frontage parking;*
- *Revised Suds design incorporated as per engineering comments and red edge updated to suit;*
- *Entrance statement added to gateway greenspace;*
- *Local Area for Play added;*
- *Repositioning of plots to create strong header buildings;*
- *Revisions to housing mix to introduce more feature plots/header buildings;*
- *Revisions to road layout to address LPA comments;*
- *Changes to the street hierarchy and design including removal of footways from one side of the primary access roads;*

- *Built form pulled back from site's north-eastern boundary to avoid protected trees;*
- *Addition of flat roof canopies to all house types to suit CAT2 requirements;*
- *All garages updated to pitched roof profiles; and*
- *Multi-use footpath added near to the farm to pick up existing FP2.*

2 The Submitted Landscape & Visual Impact Assessment (LVIA)

Introduction

2.1 The initial introduction within the LVIA (page 4) sets out the document's key objectives and is accompanied by Figure 1.1 Site Location Plan, which describes the site boundary, its location on the northern edge of Buxton and the adjacent wider townscape and landscape.

2.2 I note that an addition to the text on page 4 confirms:

'Following liaison with High Peak Borough Council, further site visits were undertaken in February and March 2024 to assess three additional viewpoints.'

Planning Policy

2.3 Thereafter, the LVIA sets out the relevant sections of the National Planning Policy Framework (NPPF) (acknowledging and incorporating the updated NPPF December 2023) and relevant policies from the adopted Local Plan (2016) for High Peak Borough Council and the Peak District National Park Local Development Framework - Core Strategy (2011) – The latter is included as the peripheries of the study area for the LVIA incorporates parts of the National Park to the north-west and south-east.

2.4 Page 10 of the LVIA references HPBC Local Plan Policy H2 Housing Allocations. The bulk of the application site is located within the defined settlement area of Buxton and within an allocated housing site named 'Land at Hogshaw, Buxton' under Policy DS 17 (which is also referenced by the LVIA).

2.5 LVIA Figure 2.2 on page 11 describes the application site boundary and the area covered by the abovementioned housing allocation. It is clear from this plan that the south-eastern part of the application site, which extends east to connect with the new (existing) roundabout on the A6 and a large rectilinear/rectangular area to the north-eastern corner of the application site, are both located within the open countryside and outside the extents of the area covered by the housing allocation.

2.6 LVIA Figure 2.3 Heritage Designations describes the proximity and extent of Fairfield Conservation Area (CA) and the location of listed buildings therein. The CA encompasses the curved, linear part of the application site in its south-eastern corner, which would accommodate the access road link to the roundabout on the A6. The CA also abuts the north-eastern corner, over a distance of circa 125m, and this boundary is currently formed by sections of a somewhat dilapidated drystone wall and a line of mature trees.

- 2.7 There is no CA appraisal for Fairfield CA. Examination of historic mapping for this area reveals that the majority of Fairfield Conservation Area was originally a common and, from the late 19th Century, has functioned as a golf course (now Buxton and High Peak Golf Club).
- 2.8 The common/golf course provides an open setting to the frontages of the houses, located on Waterswallows Road and North Road (some of which are listed).

Landscape Baseline

- 2.9 The LVIA's Landscape Baseline Section 3 addresses the relevant documented landscape character types and areas at national and county/local levels.
- 2.10 LVIA page 19 confirms that the application site and the bulk of the study area are located within National Character Area (NCA) 52 White Peak, with the north-western section of the study area located within NCA 53 South West Peak as described by LVIA Figure 3.1 (there appears to be an error in the NCA numbering on this Figure). The relevant key characteristics of these NCAs are also set out.
- 2.11 LVIA page 21 states that at a county level, the character of the landscape within the study area has been documented by Derbyshire County Council (DCC) within their Landscape Character of Derbyshire (2013 review) and at a local level, by HPBC's Landscape Character Supplementary Planning Document SPD5 (March 2006).
- 2.12 In addition, the Peak District National Park (PDNP) has produced a Landscape Strategy document which attributes various Landscape Character Types (LCTs) to both the National Park (NP) area and other adjacent areas located outside the NP.
- 2.13 The nomenclature and areas covered by the identified Landscape Character Areas (LCAs) appears to be the same within the DCC document and HPBC's SPD5. The equivalent information within the PDNP Landscape Strategy document is similar, but there are some variations in the character types identified and the areas they cover.
- 2.14 Figure 3.2 of the LVIA describes the LCTs which cover the application site and the surrounding area according to the DCC and HPBC documents. This figure ascertains that the north-western corner of the application site and a sliver of the western boundary is located within the Moorland Fringe LCT, with the main body of the application site located within the Plateau Pastures LCT (areas to the south are located within the urban area and are not attributed with an LCT).
- 2.15 Page 22 of the LVIA references a Landscape Impact Assessment that was carried out by Wardell Armstrong (WA) in 2014. This assessment was undertaken on behalf of

HPBC as part of the evidence base for the draft Local Plan and it focussed upon the potential sites identified in the Local Plan Preferred Options.

- 2.16 The WA 2014 assessment states that the application site has existing vegetation to the north which should be retained and that new planting should be undertaken along the north and eastern boundaries, due to high levels of visual prominence and potential impacts upon the NP.
- 2.17 LVIA Figure 3.3 describes the location of all the Public Rights of Way (PRoW) and open access land in the study area.
- 2.18 LVIA Figure 3.4 provides a topographical map of the study area and in particular, highlights the presence and proximity of the higher ground to the west, north-west and north, which is associated with vast tracts of CRoW access land and to a lesser extent, where the boundary of the NP extends into the study area.
- 2.19 LVIA page 26 sets out the 'Characteristics of the Assessment Site' under the sub-titles of 'Land Use', 'Topography', 'Vegetation', 'Water Bodies', 'Built Elements', 'Public Rights of Way', 'Heritage', 'Ecology' and 'Landscape Designations'.
- 2.20 LVIA page 27 concludes by setting out the '*Landscape Receptors relevant to the assessment that need to be assessed...*'. The Landscape Receptors are set out as follows:
- *Landscape Character Areas both on Site and within the study area;*
 - *Setting of heritage assets within the study area;*
 - *Setting of the Peak District National Park;*
 - *Public Rights of Way within the Study Area; and*
 - *Vegetation and landscape features within the Site and along its boundaries.*
- 2.21 LVIA pages 29 to 32 incorporate 5no site photographs with associated descriptions. These photos highlight the undulating nature of the site, the presence and proximity of the adjacent and nearby townscape of Buxton and the potential intervisibility with areas of higher ground within the study area, particularly Countryside Rights of Way (CRoW) Access Land to the west and north-west and the National Park close to the highest part of Combs Moss to the west and at Black Edge to the north/north-west.

Visual Baseline

- 2.22 The second paragraph within the Visual Baseline Section 4 states that following liaison with HPBC a further three Viewpoints were identified for assessment as follows:
- Viewpoint 28 Black Edge;

- Viewpoint 29 Buxton Road; and
- Viewpoint 30 Burbage Edge.

2.23 The LVIA's Visual Baseline Section 4 (p33) sets out the various visual receptors as follows:

- Residents of dwellings;
- Road users;
- People using PRowWs;
- People in the Peak District National Park;
- People visiting heritage assets;
- Open space users; and
- Employees at work.

2.24 I note that unlike the previously submitted assessment, the revised LVIA acknowledges that the application site can be seen from the Peak district National Park, specifically from Black Edge and Burbage Edge.

2.25 LVIA Figure 4.2 describes the location of 29no viewpoints and new Figure 4.3 describes the location of all 30no Viewpoints including Viewpoint 30 at Burbage Edge. Table 4.1 provides information about each viewpoint regarding the location, direction of view, the distance to the application site, the type of visual receptor and a short note associated with the visibility of the site. The Table has been amended to incorporate the 3no new Viewpoints 28, 29 and 30.

2.26 LVIA pages 39 to 53 incorporate all the viewpoint photos. Where appropriate, the approximate extent of the application site is described on the photographs and in more distant views, the approximate location of the application site is indicated. I note that on some of the more distant, elevated viewpoints it can be useful to highlight the location of the Application Site with a colour as it can be difficult for the reader to locate the site within the view. Viewpoints 22, 27 and 28 would benefit from this addition.

Landscape Strategy

2.27 Section 5 of the LVIA describes the proposed landscape strategy for the development.

2.28 The proposed houses are set back from the north-eastern boundary that abuts the adjacent Fairfield CA and the golf course. Existing mature trees would be supplemented with new individual tree planting and boundary hedgerow adjacent to the existing drystone wall, areas of wildflower grass and a strip of native shrub planting along the rear garden boundaries of the proposed houses. Previously this eastern boundary was

also supplemented with two blocks of new woodland understorey planting, the latest revised proposals now incorporate a linear swathe of native woodland understorey along the entire north-eastern boundary.

- 2.29 The north-eastern section of the site appears to be where the layout has changed to the greatest extent as there are fewer houses proposed. The access road into this north-eastern corner now extends closer to the eastern boundary and the proposed houses are located to its western side only and as such, their front elevations now face the eastern boundary. The offset distances between the proposed houses and the north-eastern boundary with the conservation area/golf course appears to have been reduced slightly to the north-eastern corner, whereas to the south, the offset distance has been increased.
- 2.30 The northern boundary incorporates a smaller offset and incorporates areas of wildflower grass with individual tree planting and two blocks of native shrub planting adjacent to the rear garden areas. The landscape buffer along the northern boundary of the site is slightly deeper than before and it now incorporates a linear swathe of native species woodland mix, which extends along the entire northern boundary and an adjacent linear swathe of woodland understorey that forms a continuation of the planting belt along the eastern boundary. In addition, the number of individual trees proposed along the northern boundary has also been increased.
- 2.31 To the south-east, the part of the application site that extends beyond the allocated site boundary is proposed as open space, containing the access link road to the roundabout on the A6 with adjacent open spaces to the north and south incorporating areas of wildflower grass, individual tree planting and areas of native species shrub planting.
- 2.32 A surfaced footpath located along the southern boundary of the application site would maintain the existing route of PRoW Buxton FP1 HP4/1/3, which links Fairfield CA to the east, with Brown Edge Road to the west. The landscape proposals along the southern boundary with existing houses at the northern ends of Glenmoor Road and Nunsfield Road appears to have been pared back. Previously the proposals included boundary native shrub planting/hedgerows located along the side boundaries to the proposed properties (Plots 1, 11 and 12), whereas this boundary treatment has been removed from the latest resubmitted Landscape Masterplan.
- 2.33 The linear part of the site to its south-eastern corner contains the access road that would link to the existing roundabout on the A6. Previously there were limited sections of grass and no trees planting along the access road corridor. The latest resubmitted Landscape

Masterplan and associated soft Landscape Plans incorporate grass seeding to all adjacent verges and incorporate 11no proposed trees therein.

Landscape Effects

- 2.34 Section 6 of the LVIA comprises Tables 6.1 and 6.2, which provide an assessment of the landscape effects that would arise from the implementation of the application proposals.
- 2.35 Table 6.1 assesses the '*Impact on Landscape Character Areas*', whereas Table 6.2 assesses the '*Impact on Landscape Character and Features*'.
- 2.36 Each of the landscape receptors identified within the LVIA baseline are assessed with reference to distance, notes associated with the rationale for the judgement, the sensitivity of the receptor to change and the magnitude of effect. These considerations combine to arrive at an overall significance of effect for all of the landscape receptors as follows:

Table 2.1 Summary of Landscape Effects

Landscape Receptor	Overall Significance of Effect
NCA 53 White Peak (should be NCA 52)	Minor Adverse
NCA 52 South West Peak (should be NCA 53)	Negligible
LCT Plateau Pastures	Minor Adverse
LCT Moorland Fringe	Negligible
Site Landscape Character	Moderate Adverse
Existing Land Use	Moderate Adverse
Adjoining Land Use	Negligible
Topography	Minor Adverse
Vegetation	Negligible
Water Features	Minor Beneficial
Built Elements	Minor Beneficial
Public Rights of Way	Negligible
Setting of Heritage Assets	Minor Adverse
Open Space	Minor Beneficial

Areas of Countryside Designation	Minor Adverse
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Visual Effects

- 2.37 Section 7 of the LVIA comprises Table 7.1, which provides an assessment of the visual effects that each of the identified visual receptors would be subjected to following the implementation of the application proposals.

Table 2.2 Summary of Visual Effects

Landscape Receptor	Overall Significance of Effect
Residents of Dwellings	Moderate to Minor Adverse
Road Users	Minor Adverse to Negligible
Users of Public Rights of Way	Moderate to Minor Adverse
Visitors to the Peak District National Park	Minor Adverse to Negligible
Users of Open Space/golf course	Minor Adverse to Negligible
Employees at their place of work	Negligible

Conclusions

- 2.38 Section 8 of the LVIA now references the 3 new Viewpoints and acknowledges that the Application Site and the proposals would be visible from the National Park. Section 8 concludes the assessment by stating that the development proposals would generate some levels of adverse landscape and visual effect, however it is anticipated that these effects would be localised to the application site and its immediate environs. The concluding text then goes on to suggest that effects will reduce in the longer term as proposed landscape works becomes established and that the proposal forms a logical extension to the town.

Appendix 1 – Landscape and Visual Assessment Methodology

- 2.39 The Methodology for the assessment confirms that it was undertaken in the light of the latest relevant guidance, being GLVIA3 (2013) and 'Landscape and Character Assessment: Guidance for England and Scotland' (2002).
- 2.40 The Methodology sets out how the study area and the landscape and visual receptors for the assessment were determined and how the sensitivity of those receptors is

ascertained by making judgements upon their value and their susceptibility to change (these judgements are informed by LVIA Methodology Tables 1, 2, 4, 7 & 8).

- 2.41 The Methodology then goes on to describe how the overall significance of effect is determined for the various landscape and visual receptors, which is based upon a combination of the sensitivity of the receptor and the magnitude of the change/effect. These judgements are informed by Tables 5 & 6 (landscape) and 9 & 10 (visual).

3 My Review of the Content and Findings of the Submitted LVIA

LVIA Methodology

- 3.1 I consider the assessment methodology as set out within Appendix 1 of the LVIA to be for the most part, consistent with the GLVIA 3rd Edition guidelines and appropriate given the scale of the proposed development and the landscape context of site and the associated study area.
- 3.2 My concerns with the Methodology are associated with determining the value of landscape and visual receptors, their susceptibility and their resulting sensitivity (which is determined by combining value and susceptibility of each receptor). Furthermore, there is a lack of clarity as to what the timeframes for the assessed landscape and visual effects are.

Landscape Value

- 3.3 With regards to the assessment of landscape value GLVIA3 states:

*'...the value of the potentially affected landscape (ie the landscape receptors) should be established. This means the relative value that is attached to different landscapes by society, bearing in mind that a landscape may be valued by different stakeholders for a whole variety of reasons.'*¹

- 3.4 GLVIA3 also clarifies the fact that if a landscape is not designated, it does not mean that it does not have any value. As a result, the guidance recommends that landscape value should be determined as part of the baseline and in my experience, the most common and effective approach is to consider a number of criteria and factors such as those contained within GLVIA3 Box 5.1².

- 3.5 In addition, in 2021 the Landscape Institute published a further Technical Guidance Note 02-21 titled 'Assessing Landscape Value Outside National Designations'. This document states:

'Since GLVIA3 was published in 2013, appeal decisions, high court judgements and practitioners' experience have provided further information about the factors which can be considered in assessing landscape value outside nationally designated landscapes.'

- 3.6 The guidance note therefore provided modifications to the criteria contained within GLVIA3 Box 5.1. As a result, since the publication of TGN 02-21, it is common to see landscape value considered within LVIA's with reference to the criteria contained within its Table 1. These criteria are not intended to form an exhaustive list, but they provide a

¹ GLVIA3 page 80 para 5.19

² GLVIA3 page 84

range of factors and indicators that could be considered. They include Natural Heritage, Cultural Heritage, Landscape Condition, Associations, Distinctiveness, Recreational, Perceptual (scenic), Perceptual (wildness and tranquillity) and functional.

- 3.7 By contrast, the methodology associated with the submitted LVIA is quite simplistic. I accept that the GLVIA3/TGN 02-21 guidance and the criteria therein associated with determining landscape value should not be considered to be comprehensive or is it intended to be prescriptive, and I also accept that a more detailed re-assessment of landscape value may not result in any changes to the judgements made. However, given the nature and scale of the development proposed and its landscape context, I would expect the LVIA to have considered landscape value in a manner akin to that set out within GLVIA3 and the subsequent LI TGN 02-21.

Assessment Timeframes

- 3.8 The submitted LVIA Methodology does not provide any indication of the timeframes for the assessment. The 'Overall Significance of Effect' column in LVIA Tables 6.1, 6.2 and 7.1 does not clarify at what point in time the assessed landscape/visual effect will be generated ie are the assessed effects Operational/Year 1 effects? or are they longer-term effects that have to some extent been ameliorated by landscape proposals/mitigation works?
- 3.9 The application proposals are clearly reliant on a comprehensive scheme of landscape works as described by the submitted Landscape General Arrangement Plan and the more detailed Soft Landscape Plans. New soft landscape works will generally be significantly less effective at the Operational/Year 1 stage than they would be in the medium or longer term when they have become properly established. On this matter, GLVIA3 states:

'Mitigation measures, especially planting schemes, are not always immediately effective...Where planting is intended to provide a visual screen for the development, it may be appropriate to assess the effects for different seasons and periods of time (for example, at Year 0, representing the start of the operational stage, year 5 and year 15 in order to demonstrate the contribution to reducing the adverse effects of the scheme at different stages'.³

- 3.10 I consider that seasonal variations can be addressed within the assessment process and in this instance, the Description/Rationale for Judgement narrative could incorporate some additional clarity, particularly in the case of visual effects.

³ GLVIA3 page 62, para 4.31

- 3.11 I also consider that the 'Overall Significance of Effect' columns in LVIA Tables 6.1, 6.2 and 7.1 should clarify whether the effect is a Year 1, medium, or longer-term effect. This matter is particularly pertinent in the case of Table 6.2 'Vegetation', where the overall landscape effect appears to be reliant upon new tree and shrub planting. As a result, in this instance, is there a level of adverse landscape effect in the short term, that is ameliorated in the longer-term in order to arrive at the overall significance of effect of 'Negligible'?
- 3.12 Likewise, the 'Description of the Visual Effect' column in Table 7.1 repeatedly refers to visual effects being mitigated by the Landscape Strategy...does this mean the Overall Significance of Effect is subject to the establishment of the proposed softworks, or should the reader/LPA officers assume that this effect will be reduced in the longer-term?
- 3.13 Further clarity regarding the timescales for the assessment would ensure consistency with GLVIA3 and enable the reader/LPA officers to better understand the timeframes associated with the assessed effects and the effectiveness of the proposed landscape/mitigation works.

Transparency and the Application of the LVIA Methodology

- 3.14 Notwithstanding my above comments associated with the submitted LVIA methodology's approach to determining landscape value and its timeframes for the assessment, I believe the methodology to be appropriate and generally in accordance with GLVIA3.
- 3.15 The submitted LVIA also incorporates a sound landscape and visual baseline however, I consider its section 6.0 Assessment of Landscape Effects and section 7.0 Assessment of Visual Effects to be comparatively light in terms of the level of information provided when arriving at specific judgements associated with the process of determining the overall significance of landscape and visual effects.

Landscape and Visual Receptor Sensitivity

- 3.16 The methodology contains numerous tables which help the assessor to make judgements upon key considerations such as landscape value, value of views, the susceptibility of landscape and visual receptors and the magnitude of change. GLVIA Figure 5.1 (page 71) sets out the clear steps that should be undertaken in undertaking an assessment of landscape effects within an LVIA, in that once the key landscape receptors are determined, a judgement as to their individual sensitivity should be made by combining judgements associated with 'Landscape Value' and 'Susceptibility to Change'.

3.17 The approach set out within the submitted LVIA's methodology is consistent with GLVIA3 however, the judgements made regarding 'Landscape Value' and 'Susceptibility' and any justification for them appears to be absent from section 6, and the same applies to the assessment of visual effects in Section 7. The same issues also occur with regards to judgements associated with 'Magnitude of Effect'.

3.18 It is therefore difficult for readers/officer's to fully understand the assessor's judgements associated with determining the sensitivity of the landscape and visual receptors and as such, the information provided falls short of the requirements of GLVIA3 which states:

*'In all cases there is a need for the judgements that are made to be reasonable and based on clear and transparent methods so that the reasoning applied at different stages can be traced and examined by others.'*⁴

Landscape Effects

3.19 With reference to LVIA Tables 6.1 and 6.2, the judgements associated with Sensitivity and Magnitude of Effect combine to determine an 'Overall Significance of Effect'.

3.20 The key Landscape Effects upon Landscape Character Areas ascertained by the submitted LVIA in Table 6.1 are as follows:

- NCA 53 White Peak⁵ - Minor Adverse;
- LCT Plateau Pastures – Minor Adverse; and
- Site Landscape Character – Moderate Adverse.

3.21 The key Landscape Effects upon Landscape Character and Features ascertained by the submitted LVIA in Table 6.2 are as follows:

- Existing Land Use - Moderate Adverse;
- Topography – Minor Adverse;
- Water Features – Minor Beneficial;
- Built Elements – Minor Beneficial;
- Setting of Heritage Assets – Minor Adverse;
- Open Space – Minor Beneficial; and
- Area of Countryside Designation – Minor Adverse.

3.22 In general, the identified Landscape Effects appear to be consistent with the LVIA Methodology (as set out within LVIA Methodology Table 6, which provides a matrix to inform the resulting landscape effect when combining judgements upon Sensitivity and

⁴ GLVIA3 page 21, para 2.24

⁵ This appears to be a mistake as NCA 53 is South West Peak and NC 52 is White Peak

Magnitude of Effect). With the exception of the 'Site Landscape Character', 'Vegetation' and 'Heritage Assets', the levels of landscape effect assessed, appear to be of the level one would expect, given the urban edge location of the application site, the landscape features therein and the context and character of the wider landscape within the study area. That said, I think the reader/LPA officers would benefit from a more comprehensive narrative within the 'Description/Rational for Judgement' column within LVIA Table 6.1, particularly for those character areas affected ie NCA 52 White Peak, LCT Plateau Pasture and the Site Landscape Character. This would help to better explain the judgements that combine to generate the identified landscape effects.

Site Landscape Character

- 3.23 The development proposals would change the character of the site from a rural, albeit, urban fringe character to one of residential built form.
- 3.24 This change would be significant and would, in my opinion result in a higher level of adverse effect than the '*Moderate Adverse*' assessed by the submitted LVIA.
- 3.25 A higher level of adverse effect is somewhat of an inevitability when developing a green field site, however it is also inevitable when assessing a development site in isolation. When undertaking LVIA's, I would usually assess the 'Site and its Immediate Context' rather than the site itself, in order to ascertain how a development may affect the site and concurrently, how those changes may affect the locality/immediate setting.

Vegetation

- 3.26 The existing trees are one of the key landscape features of the application site. It is important to understand which existing trees would be retained and which would require removal in order to ascertain and assess the effect of the proposed development upon this landscape resource.
- 3.27 The removal of a relatively small number of trees of varying quality, which includes T22, which is subject to a TPO⁶, would inevitably generate some adverse landscape effect, particularly at Year 1, when the proposed planting would not be established. The assessed '*Negligible*' landscape effect upon vegetation does not acknowledge these tree losses, as the rational for the judgement states:

'New tree, shrub and other planting proposed throughout the built area and open spaces will supplement and complement existing tree resource...'

⁶ Submitted AIA paragraph 4.5.2

- 3.28 Also, LVIA Table 6 considers the effects upon the 'Vegetation' landscape receptor without any acknowledgement of the removal of a TPO tree T22 (I note that the Arboricultural response recommends that this tree is retained).
- 3.29 I would expect the tree removals to generate an adverse magnitude of effect and thus an overall adverse landscape effect, particularly at Year 1. In the longer term, it may be possible to reduce this effect via the establishment of the proposed landscape works. These issues are related to the issues raised within the 'Assessment Timeframe' section of this response.
- 3.30 Furthermore, the Arboricultural response highlights how the proposed native species woodland planting along the north-eastern boundary of the site, which abuts the CA is inappropriate due to the presence of the mature trees along this boundary (the detailed reasons for this are set out within their response so I do not repeat them here).
- 3.31 These proposals appear to respond to Policy DS17 which states that native tree and shrub blocks should be planted on the northern and eastern boundaries of the site. This policy guidance applies to the site allocation where the eastern boundary is circa 90m to the west of the north-eastern site boundary for this application. Proposed native species woodland planting in this location would be appropriate as it forms open ground, away from the existing mature trees.

Setting of Heritage Assets

- 3.32 With the exception of acknowledging the new access road would be located within the CA, the description/rationale for the judgement associated with the 'Setting of Heritage Assets' does not make any reference to the presence and proximity of the north-eastern boundary of the application site to Fairfield Conservation Area. The north-eastern section of the site extends circa 90m beyond the eastern boundary of the allocated site⁷, up to the western edge of the conservation area.
- 3.33 The eastern edge to the conservation area is formed by a drystone wall and mature trees (see my Site Photograph 4 in Appendix 1 of this document) and according to historic mapping, also forms the alignment of a former Roman Road. The application proposals are set back from this boundary behind a landscape buffer that will contain areas of wildflower grass and native species shrub/tree planting and these proposals have been improved to include a linear swathe of native species understorey planting in addition to the originally proposed individual trees (this buffer is presumably a design response to the presence and sensitivity of this boundary, however as stated above, the Council's

⁷ See LVIA Figure 2.2

arboricultural consultant has raised concerns regarding the appropriateness of the proposed extensive planting of native species trees below the canopies of existing mature trees along this boundary).

- 3.34 The 'Setting of Heritage Assets' receptor is attributed with a '*Minor Adverse*' landscape effect, however with reference to the LVIA Methodology Table 6, the combination of High Sensitivity and a Small Magnitude of Effect should in my opinion, have resulted in a higher level of adverse landscape effect than the assessed '*Minor Adverse*'.

Area of Countryside Designation

- 3.35 It's a minor point but it is unusual to reference Open Countryside as a 'designation' as it could suggest to the reader that it is a 'designated' landscape, and potentially infers that it could be a 'valued' landscape in terms of NPPF paragraph 187a (December 2024). Although all landscape and certainly the open countryside is generally considered to be of value, my understanding is that designated landscapes such as National Parks, AONB's and Registered Parks and Gardens, are generally accepted to be of the highest value, whereas open countryside would, in most instances, be expected to be of a lower value than a designated landscape.

Visual Effects

Visual Receptors

- 3.36 Section 4.0 of the submitted LVIA sets out the relevant visual receptors and includes Residents of Dwellings, Road Users, People Using Public Rights of Way, People in the Peak District National Park, People visiting/using Heritage Assets, Open Space Users and Employees at Work.
- 3.37 I believe these visual receptors represent the various groups of people that experience views of the application site that may be affected by the proposed development, however I note that a plan diagram describing the location of the various receptors, including identifying sections of PRoWs from which views of the application site are experienced, would be useful.
- 3.38 I also note that people walking in areas defined as CRoW Access Land should be incorporated into the assessment. These receptors could be included within the People Using Public Rights of Way visual receptor group.

Views from the National Park

- 3.39 Views from the National Park at Black Edge and Burbage Edge were previously scoped out for the following reason/s:

*'Views to the Site for visitors of the National Park are anticipated to be truncated due to a combination of mature vegetation, landform and built form.'*⁸

- 3.40 These views have now been incorporated and assessed within the resubmitted LVIA.
- 3.41 When looking in a south-easterly direction from Black Edge, Buxton can be clearly seen, as can the upper, north-eastern fields within the application site. This view is described by my Viewpoint Photograph 1 in Appendix 1 of this response and by Viewpoint 28 of the resubmitted LVIA.
- 3.42 The resubmitted LVIA assesses the visual effects upon visitors to the National Park as one effect, being '*Minor Adverse to Negligible*'.
- 3.43 I suggest that the value of the view/s experienced from the NP is high and their susceptibility is high, therefore resulting in a high level of sensitivity. Given the nature of the views experienced from Black Edge/NP and the distance to the site, I would attribute a small adverse magnitude of effect, thus resulting in a higher level of adverse visual effect than assessed '*Minor Adverse to Negligible*' assessed by the LVIA (based upon the LVIA matrix provided with its Methodology (Table 10))⁹.
- 3.44 Burbage Edge is located at some distance from the application site. In this instance I suggest that the value of the view/s is high and their susceptibility is high, therefore resulting in a high level of sensitivity. Given the nature of the views experienced from Burbage Edge/NP and the distance to the site, I would attribute a negligible adverse magnitude of effect, thus resulting in a visual effect akin to that assessed by the LVIA (based upon the LVIA matrix provided with its Methodology (Table 10)).
- 3.45 I therefore disagree with the LVIA's assessment of the visual effect of the development from Black Edge (Viewpoint 28), which I believe is understated and I agree with the assessment upon the visual effect experienced from Burbage Edge.

Views from the A6

- 3.46 The A6 forms a key route into and out of Buxton and the section located close to the application site forms part of the experience of arriving and leaving the town. Road users are identified as a visual receptor within the submitted LVIA and the views experienced from the A6 are mentioned within the LVIA Table 7.1 Assessment of Visual Receptors.

⁸ Previously submitted LVIA page 33

⁹ LVIA Appendix 1 Methodology page 66

- 3.47 The initial submitted LVIA did not include any Viewpoint photographs from the A6. I note that the latest iteration of the LVIA now incorporates Viewpoint 29, which considers the view from the A6 towards the Application Site.

Viewpoints

- 3.48 The 29no viewpoints provided within the LVIA are described by the Methodology as covering three types of views, being Representative Viewpoints (which form the majority), Specific Viewpoints and Illustrative Viewpoints. No indication is given as to which of the 29no viewpoints are Representative, Specific or Illustrative.
- 3.49 LVIA Viewpoints 9, 10, 11, 16, 18, 19, 20, 21, 23, 25 and 26 do not appear to incorporate a view of the application site, so I am at odds as to why they are included in the LVIA as Viewpoints. These 'viewpoint' photographs are taken from various locations within the study area, including Public Rights of Way and roads and on initial inspection of the document, their incorporation attributes the application site with a distorted, higher level of perceived visual prominence than is actually the case. Up to the point at which the reader understands this, the inclusion of these 'viewpoints' can be misleading.

Assessment of Visual Effects

- 3.50 Table 7.1 considers each of the identified Visual Receptors and sets out the assessor's judgements for Sensitivity, Magnitude of Effect and Overall Significance of Effect.
- 3.51 Each of the Visual Receptors are assessed as a group, within one row in Table 7.1. For example, with regards to people using PRoWs, the nature of the overall significance of visual effect that would be experienced from each of the different PRoWs identified is not ascertained. Table 7.1 sets out the PRoWs where users experience a view and ascertains that these receptors will be subject to an overall significance of effect of '*Moderate Adverse to Minor Adverse*'.
- 3.52 This approach is repeated for each of the 6no visual receptor groups identified. Assessing a range of visual effects for each of the visual receptor groups summarises the visual effects and in my opinion, is more akin to a level of assessment associated with a much lighter touch Landscape and Visual Appraisal than a fuller LVIA, which is purported in this instance.
- 3.53 A fuller understanding of the visual effects of the development proposals could be provided by the separate assessment of each individual visual receptor ie people walking each individual PRoW or using each individual road. As it stands, the reader has no idea what the assessed level of visual effect for a particular receptor would be, for example, somebody walking alongside the site on Footpath Buxton-HP4/1/3 near Nunsfield Road

(Viewpoint 5) compared with somebody walking across the golf course to the east of the A6 on Footpath Buxton-HP4/10/1 ...based on the findings of the LVIA, the visual effect would be the same ie. between '*Moderate and Minor Adverse*' in both instances. In reality, the visual effects associated with Viewpoint 5, which is located immediately adjacent to the site, would be expected to be much higher/more adverse, than the visual effects associated with Viewpoint 7, from which views of the site are very limited however the LVIA provides no indication of the difference in the visual effect from different footpaths.

- 3.54 With regards to the judgements made in Table 7.1, I consider the Overall Significance of (Visual) Effect to be understated, particularly the visual effects associated with the Residents of Dwellings, Road Users, the Users of PRowS and Visitors to the Peak District National Park.
- 3.55 With regards to the views from the A6, I believe the sensitivity of these road users should be 'medium' rather than 'Low' based on the value of the views experienced and their susceptibility¹⁰. I consider that attributing the users of the A6 with a 'Low' sensitivity could have the effect of understating the visual effects that may be experienced by these road users. In addition, the views of the development from the A6 will comprise partial views (clearer when the intervening trees are without any foliage) of the front elevations of the properties. The initial submission had the rear elevations of the proposed properties facing the CA, the golf course and the A6 in this location, whereas the latest revised proposals re-orientate these properties so their front elevations face the CA/golf course. I consider this re-orientation to be an improvement.
- 3.56 There are residential properties and a Public Footpath located immediately adjacent to the southern boundary of the site and there is a Public Footpath located very close to its north-eastern boundary, within Fairfield Conservation Area. The views experienced from these locations are described by LVIA Viewpoints 1, 2 (these describe views from Public Footpath FP2 HP4/2/1) and Viewpoints 3, 4 and 5 (these describe the views from Public Footpath Buxton FP1 HP4/1/3 and adjacent residential properties located next to the site's southern boundary).
- 3.57 I believe these views will be affected to a greater extent than suggested by the LVIA, which assesses an overall significance of effect of '*Moderate to Minor Adverse*' for both Residents and Footpath Users. Given the Medium/High sensitivity of these receptors, their proximity to the site and the extent of the changes to the views experienced, I would

¹⁰ See GLVIA3 page 114, para 6.33

expect the visual effects to be more adverse, particularly in the short term, than indicated by the LVIA.

- 3.58 As mentioned earlier, when considering the proposed Landscape Strategy, the landscape proposals along the southern boundary with footpath Buxton FP1 HP4/1/3 appear to have been pared back when compared to the initial submission. The reason for this change is difficult to understand as this is a particularly sensitive boundary with visual receptors on a public footpath and the residents of properties positioned nearby and the lack of proposed vegetation will offer little in the way of mitigation in the views experienced by the footpath users and the adjacent residents. The users of this footpath and the adjacent residents currently benefit from a rural outlook across a greenfield site. The development proposals will fill the field with housing and new properties will be located close to this boundary, the footpath and the existing houses. I believe the users of this footpath and the residents of the adjacent houses would be affected to a much greater, adverse level than that indicated by the submitted, revised LVIA ie the visual effects have the potential to be greater/more adverse than '*Moderate to Minor Adverse*' as assessed by the submitted LVIA.
- 3.59 Where there is more substantial landscape works proposed, such as along the north-eastern boundary, the visual effects associated with the footpath adjacent to the north-eastern boundary of the site may reduce as proposed landscape works contained within the intervening landscape buffer becomes established. However, these effects and how they may change/reduce in the longer term due to the development of proposed landscape works/mitigation, is not clearly described by the LVIA.
- 3.60 The submitted LVIA does not assess any significant effects (being landscape and visual effects that are Major/Moderate or Major¹¹), however I believe that the LVIA understates the effects and that in fact, some higher (significant) levels of adverse landscape and visual effect may be generated, for example the Footpath Users and Residents located in close proximity to the site's southern boundary, would in the short term, likely be subject to a higher level of adverse visual effect than the assessed '*Moderate to Minor Adverse*' visual effects attributed by the submitted revised LVIA. I note however, that these short-term visual effects could to an extent, be ameliorated by incorporating additional landscape works along the southern boundary of the site.

¹¹ See LVIA Methodology page 64

4 Conclusions

Summary

Landscape and Visual Effects

4.1 Having visited the application site and the surrounding area and considered the relevant submitted application documents and drawings, particularly the LVIA, I draw the following conclusions regarding landscape and visual matters:

- I consider the assessment methodology as set out within Appendix 1 of the LVIA to be for the most part consistent with the GLVIA 3rd Edition guidelines and appropriate, given the scale of the proposed development and the landscape context of site and the associated study area;
- My concerns with the Methodology are associated with determining the value, susceptibility and sensitivity of the landscape and visual receptors and a lack of clarity as to what the timeframes for the assessed landscape and visual effects are. Determining the Landscape Value of non-designated landscapes requires a more robust assessment of detailed criteria than that contained within the LVIA and its methodology, in order to be consistent with GLVIA3 and LI TGN 02-21;
- The timeframes for the assessed 'Overall Significance of Effect' (landscape and visual) are not clear. The narrative within the Description of Effect sometimes references the effects of the proposed landscape works, however these effects will only come into effect in the medium to longer term – are the landscape and visual effects Year 1 (short term), Year 5 (mid-term) or Year 15 (long term) and are the effects of the establishment of the landscape proposals taken account of?;
- Notwithstanding the issues I raise which are primarily related to the visual prominence of the site and views/viewpoints, the submitted LVIA provides a sound landscape and visual baseline however, I consider its section 6.0 Assessment of Landscape Effects and section 7.0 Assessment of Visual Effects to be comparatively light in terms of the level of information and transparency provided when arriving at specific judgements associated with the process of determining the overall significance of landscape and visual effects;
- With the exception of the 'Site Landscape Character', 'Vegetation' and 'Setting of Heritage Assets', the levels of Landscape Effect assessed, appear to be of the level one would expect, given the urban edge location of the application site, the landscape features therein and the context and character of the wider landscape

within the study area. That said, I think the reader/LPA officers would benefit from a more comprehensive narrative within the 'Description/Rational for Judgement' column within LVIA Table 6.1, particularly for those character areas which would be directly affected ie NCA 52 White Peak, LCT Plateau Pasture and the Site Landscape Character. This would help to better explain the judgements that combine to generate the identified landscape effects and would provide the assessed effects with added credibility;

- I consider the '*Moderate Adverse*' landscape effect assessed for the 'Site Landscape Character' is understated as the change from a green field site to an area of residential development would be acute;
- I consider the '*Negligible*' landscape effect assessed for the 'Vegetation' landscape receptor to be understated. The LVIA does not acknowledge a TPO tree being removed (T22) and I anticipate a higher adverse level of short-term landscape effect would result however, it is possible that a short-term adverse effect could be reduced in the longer term by the proposed landscape works;
- I believe that the '*Minor Adverse*' landscape effect associated with the 'Setting of Heritage Assets' landscape receptor is understated by the LVIA. The proposals extend outside the allocated area, towards the site's north-eastern boundary which abuts the conservation area. The LVIA does not appear to consider how the setting of the CA would be affected by the development proposals. I anticipate a higher adverse level of short-term landscape effect would result however, it is possible that a short-term adverse effect could be reduced in the longer term by the proposed landscape works;
- The revised LVIA now assesses the views experienced by people walking on Access Land within the National Park at Black Edge to the north/north-west (Viewpoint 28) and Burbage Edge to the west (Viewpoint 30). The LVIA assesses a visual effect of '*Minor Adverse to Negligible*' for these two Viewpoints. I agree with the assessed visual effect from Burbage Edge, however with reference to my Appendix 1, Viewpoint Photograph 1 and LVIA Viewpoint 28, I consider that the LVIA understates the visual effect of the development proposals upon the views experienced from Black Edge in the National Park.
- With reference to new Viewpoint 29, the revised LVIA now assesses the views experienced by people travelling on the A6, which forms a key route into and out of Buxton, attracting high levels of tourist traffic. The LVIA assesses the views from a number of different roads and combines the visual effect ('*Minor Adverse*

to *Negligible*'), so it is not possible to understand what the actual visual effect is upon the views from the individual roads. Also due to the absence of any indicated timescales for the effects, it is not possible to understand how a short-term adverse effect may be reduced in the longer term by the proposed landscape works. I believe that short-term adverse visual effects upon the views experienced from the A6, the golf course and Public Footpath FP2 HP4/2/1 have the potential to be reduced by the landscape proposals in the longer term, but the LVIA does not clarify or indicate how short-term effects may change in the longer term.

- I believe that the '*Moderate to Minor Adverse*' visual effect associated with the views experienced from Public Footpath Buxton FP2 HP4/2/1 adjacent to the north-eastern boundary of the application site (see LVIA Viewpoints 1 and 2), is understated by the LVIA. This footpath is located within the conservation area and the proposed houses located within the north-eastern corner of the site would clearly be visible from the footpath, particularly in the short term and particularly when the existing boundary trees are without leaf cover (the LVIA does not appear to consider such seasonal variations). In the longer term the establishment of the proposed intervening landscape works would likely reduce the level of adverse visual effect upon these views (I have similar concerns with regards to the visual effects assessed from the golf course and from the A6 - Viewpoint 29);
- I consider the visual effects associated with the users of Public Footpaths and the Residents of Properties located in close proximity to the application site (on the southern boundary in particular – LVIA Viewpoints 3, 4 and 5) are understated. Having reviewed the visual effects, I believe these receptors would be subject to higher levels of adverse visual effect than indicated by the LVIA and that as a result, I would recommend a wider offset to the proposed houses with additional landscape mitigation along the southern boundary of the site.

The Extension to the Allocated Site

- 4.2 I note that the proposed site extends beyond the boundary of the allocated site to its south-eastern corner and its north-eastern corner. The south-eastern corner would incorporate the access link road and adjacent areas of open space and landscape works so I do not believe this part of the site would generate any particular landscape or visual effects that would be of a concern.

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- 4.3 The north-eastern corner of the development site however, extends beyond the allocated area by circa 90m, up the slope to the east, to the boundary with Fairfield Conservation Area, and in doing so, also extends the northern boundary of the site. The sensitivity of these boundaries and their relationship with the National Park is highlighted within the High Peak Local Plan Landscape Impact Assessment (2014) by Wardell Armstrong, which considered the various allocated sites in the borough. This is also highlighted within the submitted LVIA.
- 4.4 With reference to my Viewpoint 1 in Appendix 1 of this response and LVIA Viewpoint 28, which describes the view from Black Edge within the National Park, the proposed extension of the residential development beyond the north-eastern corner of the allocated site would appear to have the potential to create an area of development that is somewhat disconnected from the southern portion of the site and the existing urban edge of Buxton.
- 4.5 In addition, this extension beyond the allocated area will bring the proposed houses significantly closer to the boundary with Fairfield Conservation Area and the nearby footpath therein (Public Footpath Buxton FP2 HP4/2/1 - see LVIA Viewpoints 1 and 2).
- 4.6 The landscape proposals located along the northern boundary of the application site have also been improved when compared to the previous submitted proposals. As the boundary planting becomes established, it should provide higher levels of screening, particularly from sections of the nearby footpath to the north-east.
- 4.7 Improved proposed boundary treatments along the northern edge of the site are welcome and would likely improve the assimilation of the site into its setting however, due to the elevated nature of the views and the sloping nature of the site, the boundary planting is unlikely to screen the development within the views experienced from Black Edge in the National Park.
- 4.8 Overall, I believe the extended development area that is outside the allocated site area, to the north-eastern corner of the site, would exacerbate the levels of adverse landscape effect with regards to the setting of the conservation area. I also believe that the proposed development which is outside the allocated area to the north-eastern corner of the site exacerbates the adverse visual effects of the proposed development upon the views experienced by people located within the National Park on the ridgeline at Black Edge, people walking footpath Buxton-FP2 HP4/2/1 within Fairfield Conservation Area, users of the A6 and golfers.
- 4.9 I accept that the likely longer term residual visual effects for these receptors could be reduced by the proposed landscape works however, I strongly believe that it is

imperative that the reader/HPBC officers are made aware of, and understand the effects that may result from extending the developed area beyond the allocated site area and to understand how short-term effects may change in time as the landscape proposals become established.

Conclusion

Methodology, Approach and Landscape Effects

- 4.10 With the exception of the abovementioned issues, I find the submitted LVIA to have an appropriate methodology and a sound landscape and visual baseline and I also believe that with the exception of the 'Site Landscape Character', 'Vegetation' and 'Heritage Assets' the assessed landscape effects associated with the key landscape receptors to be appropriate and proportionate, given the scale and nature of the site, the proposed development therein and their landscape context.

Visual Effects

- 4.11 I have highlighted some concerns with the assessed visual effects of the proposed development.
- 4.12 I believe the LVIA to an extent, understates the nature of some of the visual effects associated with visual receptors located in close proximity to the site. These visual receptors include the residents of properties and footpath users located close to its boundaries and people located within the National Park at Black Edge. I believe these receptors would be subject to higher levels of adverse visual effect than indicated by the LVIA.

Overall

- 4.13 In my opinion, the proposed development within the north-eastern corner of the application site, which extends beyond the confines of the allocated site, exacerbates the levels of landscape and visual effect and that in some instances the LVIA understates the level of the anticipated (adverse) landscape and visual effect.