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**GLEESON STRATEGIC LAND**

**PROPOSED DEVELOPMENT OF  
LAND AT MANOR FARM,  
COMBE HILL, TEMPLECOMBE  
SOUTH SOMERSET  
BA8 0LJ**

**REBUTTAL OF CONSULTEE RESPONSE FROM  
CHARLES POTTERTON – SSDC  
APPOINTED LANDSCAPE CONSULTANT**

JULY 2020

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Appendix A: Landscape Institute – Technical Guidance Note 1/20,  
dated 10 January 2020

## 1.0 INTRODUCTION

- 1.1 David Williams Landscape Consultancy (DWLC) was instructed by Gleeson Strategic Land on the 29<sup>th</sup> July 2020 to undertake a review and prepare a rebuttal / response to the Consultee Landscape Response from Charles Potterton – South Somerset District Council’s appointed landscape consultant, (referred to hereafter as the Council’s Landscape Response or CLR).
- 1.2 The purpose of this brief report is:
- a) To review the scope / policy context and methodology used by Charles Potterton and whether the CLR follows the Landscape Institute – “Technical Guidance Note 1/20”, dated 10 January 2020 and whether it is consistent with methods / guidance promoted by Natural England, as set out in “Guidelines for Landscape and Visual Impact Assessment – Third Edition” (GLVIA3) published by the Landscape Institute and Institute of Environmental Management and Assessment in April 2013, and Natural England’s “An Approach to Landscape Character Assessment” published in October 2014;
  - b) To review the contents of the Council’s Landscape Response and whether the comments made are supported by analysis and evidence and whether the reasoning and conclusions reached are fair and transparent;
  - c) Draw conclusions arising from the above and summarise the recommendations of the review.
- 1.3 Section 2.0 of this report sets out detailed comments on the Council’s Landscape Response, with reference to the headings and paragraph numbering in the CLR, whilst Section 3.0 set out the conclusions of the review.
- 1.4 The review has been carried out by David Williams CMLI, (Owner / Principal of David Williams Landscape Consultancy Ltd) with over 35 years post-qualification in Landscape Architecture and until March 2009 held the position of Landscape Director at Barton Willmore based at Calcot, Reading in Berkshire. Before that he was an Associate Director of Entec UK Ltd for two years (in their Reading office) and prior to that he was employed by Chris Blandford Associates, in charge of their London office for four years. Before that he was employed by Barton Willmore Environmental for 17 years; rising to the position of Director of the company before leaving in April 2001.
- 1.5 DWLC has been involved in the promotion of land at Manor Farm, Combe Hill, Templecombe, South Somerset BA8 0LJ, (the Site) since October 2018 (and continues to provide landscape advice on the Site) and is therefore very familiar with the landscape surrounding Templecombe and the River Cale Valley including the landscape character and visibility of

the area and views towards the Site. In addition, DWLC have prepared the Report on Landscape and Visual Matters dated 21<sup>st</sup> November 2019, and also the Updated Report on Landscape and Visual Matters dated 26<sup>th</sup> June 2020 which assessed the revised scheme for up to 60No. dwellings on the Site, accompanying the planning application (SSDC Ref:19/03416/OUT). Both reports accord with GLVIA3.

## 2.0 REVIEW AND COMMENTARY

### Introduction and Background

- 2.1 Paragraph 2 of the Council's Landscape Response highlights that Charles Potterton had visited the Site and that he had read "*all the relevant documents submitted in relation to the application*". What the introduction does not state is when the Consultant was appointed, what the scope of his appointment was, when the site visit was undertaken (including commentary on what the weather conditions were at the time) nor does it set out the approach / method used in undertaking the work.
- 2.2 The Landscape Institute 'Technical Guidance Note 1/20' (TGN 1/20), dated 10<sup>th</sup> January 2020, provides guidance on carrying out reviews of landscape and visual appraisals, analysing in a structured and consistent way if the assessment reflects the approach advocated in GLVIA3 and that the LVA has led to reasoned and transparent judgements. Section 3 of the technical note sets out three main components of a review of a LVA, leading to a report containing the overall conclusions in respect of the completeness, competency and reliability of the LVA. The 3 key steps of a review are:
1. Checking the methodology used to undertake the assessment, the criteria selected (including balance between), and the process followed;
  2. Checking the baseline, content and findings of the assessment;
  3. Checking presentation of the assessment findings.
- 2.3 The last step of the review process is to use the reviewer's finding to draft a short report, the contents of which is set out on page 6 of the Technical Note. See Appendix A.
- 2.4 The Council Landscape Response provides none of the details on the approach or method used in undertaking the review nor does it provide any detail on the method used to carry out the assessment of the Site and its surroundings, in order to reach the judgements set out in paragraph No's 22 to 29 of the Council's Landscape Response. It is therefore difficult to replicate the analysis of the Site and reach similar finding or conclusions. It is also uncertain whether CLR is clear and transparent and consistent in following industry recognised guidance such as GLVIA3 or TGN 1/20.
- 2.5 The CLR also does not provide any commentary on the methodology used by DWLC in undertaking the original Report on Landscape and Visual Matters (Nov 2019) or the Updated Report on Landscape and Visual Matters (June 2020) (URLVM) and whether there is agreement or disagreement on the value, susceptibility, sensitivity or magnitude of change criteria and resultant landscape and visual effect rankings, set out in Appendix A of the URLVM, and on what basis there is disagreement and why.

- 2.6 This section also states that Charles Potterton has read all relevant documents but it is obvious from some of the comments in CLR that this is not the case. The development description at the start of the CLR refers to the earlier scheme as the proposed development is now for development up to 60 dwellings not 76 dwellings.
- 2.7 It would also been helpful to list the documents read (and reviewed) in preparing the commentary set out in the CLR. For instance the Heritage Report and Visualisations included in the Design and Access Statement are not referred to in CLR and these document assess the historical importance of the area and also illustrate the likely change and impact of the scheme on the landscape and views.
- 2.8 It should also be noted that CLR make no reference to the Statutory Development Plans and / or planning policy context of the Site which is usually the starting point of an assessment of the Site and determining the issues to be considered as well as the Sites value and sensitivity.

### **The Site**

- 2.9 Paragraph No's. 4 to 7 of the CLR provide a very brief description of the Site and its location. Paragraph No. 4 states that *"the topography in this area is particularly important and the existing farm buildings sit at approximately the highest point of the village and on somewhat of a promontory at some 30m higher than the valley landscape to the east"* whilst paragraph No. 5 goes on to state: *"This landform must be one of the primary drivers in terms of any proposed layout as it plays a significant role in determining the degree of (inter)visibility of the site"*.
- 2.10 Firstly, it is disagreed that the existing farm buildings sit at approximately the highest point of the village. It is evident from looking towards the Site from the eastern side of the River Cale valley and also the OS mapping of area, that the existing farm buildings are not at the highest point, which is to the west of the Site, and the farm buildings sit below the roof tops of houses to the west and north of the Site. There is also no evidence presented as to why the topography in this area is *"particularly"* important and *"one of the primary drivers in terms of any proposed layout"*. Topography is one of many factors that need to be taken into account when assessing the Site as well as one of many, sometimes competing factors informing the design and layout of the proposed development. In addition, the description fails to mention that the promontory referred to is a man-made feature occupied by slurry pits.
- 2.11 Secondly, the role topography plays in determining the degree of (inter) visibility of the site is not clear. Is Charles Potterton referring to the degree of inter visibility of views within

the Site or degree of inter visibility of views outwards from the Site and towards the Site. Also the CLR, in this section and also under the Visual Impact heading, does not set out where the Site is visible from or consider the contribution that the Site makes to views, or the local or wider landscape. The URLVM deals with both in section 3.0.

- 2.12 Paragraph No.6 is a general comment on vegetation on the Site and lacks detail in terms of location, type, and role / contribution that the vegetation makes to the character or visual appearance of the Site and screening provided.

### **The principle of development**

- 2.13 Paragraph No's.9 to 11 refer to a number documents which have considered the suitability of the Site for development. However these document only provide a 'snap shot' of suitability based on the factor pertinent at the time. Very little is mentioned of the South Somerset 'Peripheral Landscape Studies' report which looked at the Site is some detail to reach its conclusions and the conclusions of the CLR are not to be consistent with this previous advice and provide no reasoning or justification why the area set out in paragraph No.22 to 27 are different to this earlier study.
- 2.14 Paragraph No.11 concludes *"Having visited the site and having studied the submitted information, I would agree that the site has potential for 'some' development, but the unique set of constraints provided by this site mean that density should not be any measure of acceptability or appropriateness"*.
- 2.15 Firstly, it pleasing to see an acknowledgement that the Site has the potential to accommodate 'some' development and that the Site has a unique set of constraints but virtually all sites are different and therefore have a unique set of constraints as they are in different locations, contexts and have different issues. The 'unique set of constraints' of the Site have been assessed in detail in the many reports that accompanied the planning application and they have informed the layout, design and quantum of development that the application is seeking.
- 2.16 It is also agreed that "density" should not be any measure of acceptability or appropriateness although, apart from the PLS, none of the Council's other studies refer to density but an indicative quantum of development potentially suitable for the Site.

### **Landscape character**

- 2.17 Paragraph No.13 refers to paragraph No's.3.25 to 3.27 and Charles Potterton disagrees with them. These paragraphs are direct quotes from the 1993 South Somerset LCA which are considered relevant to the consideration of the Site and are in no way intended to provide justification for any development on the Site. They just highlight concerns and issues at

that time (1993) and that could be relevant today. Charles Potterton goes on to state: *“Indeed, ‘widespread concern amongst parish councils at the loss of identity, sense of place and the urbanisation of the countryside’ would suggest reasons why not to develop”*. However, this is a simplified approach and each site should be considered on its merits and particular set of issues and should be informed by proper assessment of the issues and development proposals all of which would inform the decision maker (in this case the South Somerset District Council, Case Planning Officer) and inform the ‘planning balance’ of material planning considerations that determines whether the form of development is acceptable.

- 2.18 Paragraph No.14 states: *“At 3.66 of the LVIA, the site is given a rating of ‘moderate to low’ value. I suggest that it actually has an increased value because of its historical importance”*. and Charles Potterton then refers to Historic England’s response, dated 11<sup>th</sup> February with regard to the Site ‘rarity’, quoting relevant text from the HE letter and in paragraph No.15 accepts that the statement has been made in regard to the setting of the listed building and then goes on to state that: *‘it still relates to the same piece of land’*.
- 2.19 This approach to heritage considerations is wrong and unduly elevates the value of the Site. This approach also clearly ignores the existing farm buildings on the Site, which effectively curtail any visual relationship of the southern parts of the Site with the setting of the Listed building, and provides the present day context for the Listed building, reducing the historic importance of at least those parts of the Site to the south of Manor Farm. The historic setting that HE refers to is relevant to the northern parts of the Site and have been considered in the Heritage Report submitted with the application.
- 2.20 Paragraph No.15 also quotes a further section of the HE letter: *‘We are convinced that a less harmful layout can identified within the application site that will allow for a more meaningful buffer to be created to the grade II\* listed Manor House. In our view, alternative layouts, avoiding development in the north-west section while retaining views through the wider countryside, would significantly minimise the impact to the highly designated asset (Para 190, NPPF)’*. However, this observation by HE is now superseded by the latest Illustrative Masterplan drawing No. 406 Rev J and the latest comment from HE is set out in their response dated 16<sup>th</sup> July 2020 and they confirm that:

***“The revised masterplan allows the grade II\* listed Manor to retain a more meaningful link to its rural setting.***

***Historic England has provided previous responses in respect of this application (HE letter’s dated 19 February and 23 April 2020). Within these letters the significance of the grade II listed Manor House and the contribution made by its setting is covered in more detail***

*The current amended plans look to respond to concerns raised in our previous letters regarding the response of the master plan to the site's heritage constraints.*

*The design and layout of the proposed masterplan, following the reduction in the number of units, has allowed for the creation of a more meaningful green space within the setting of the Manor. Along the proposed boundary, the reduced density and maximum 2 storey height, as well as the greater use of open space assists in creating a more gradual transition between the development and Manor Green.*

*The level of harm has been substantially reduced by the most recent amendments. The residual harm will need to be considered by the council as part of their wider planning balance set out under Para 196, NPPF".*

- 2.21 Paragraph No.16 points out the obvious, that *"clearly there will be a change to the character of the site and to its immediate surroundings"*. The final sentence of that paragraph is an 'opinion' as what is appropriate to the Site depends on a range of factors and should be considered as part of the planning balance and, from a landscape point of view, this would be informed by proper assessment following GLVIA3 methodology which the URLVM provides the Council.
- 2.22 Again paragraph No.17 includes an 'opinion' with regards the layout of the development *'by ensuring the layout is as discrete as possible'*. Discrete means individually separate and distinct and the idea of separating the proposed development from the village ignores the existing context and visibilities of the area and character and patterns around Templecombe as well as sustainability and connectivity issues. Templecombe is a valley side settlement which is not discreet and being able to see development is not necessarily harmful.
- 2.23 Paragraph No.18 is again 'opinion' which is not supported by any evidence presented. Also not all development is harmful and the degree of harm needs to be informed by an LVIA which the URLVM provides.

### **Visual Impact**

- 2.24 As with the landscape character comments in the CLR, there is little or no supporting analysis of the visual aspects of the Site and impacts of the development proposals. There is no consideration of the location, type, nature and extent of views towards the Site, the contribution that the Site makes to views or the value, susceptibility, sensitivity of the views towards the Site from near, middle or distant viewpoints. The URLVM sets out the representative viewpoints where views towards the Site can be obtained, following a number of site visits over a period of time, and the CLR does not identify any other representative views that ought to be considered and, apart from mention of Public Footpath No.WN29/12

- to the south, the CLR is silent on views and consideration of impacts and visual effects on views.
- 2.25 This section also makes two criticisms of the LVIA. The first in Paragraph No.20 relating to ZTV and the second regarding Paragraph No's 3.36, 3.68 and 3.70.
- 2.26 With regard to the ZTV, the open sentencing of paragraph 3.47 of the URLVM makes it clear how the ZTV was determined and states: *The site visits and visual assessment indicated that the likely "Zone of Theoretical Visibility" (ZTV) of the proposed development,...* (the relevant text is underlined), with the remainder of the paragraph and paragraph 3.48 and 3.49 describing the estimated extent of the likely 'Zone of Theoretical Visibility' of the scheme. No computer generated 'Zone of Theoretical Visibility' (ZTV) mapping has therefore been prepared or produced and it is not included in the URLVM.
- 2.27 In paragraph No.21, Charles Potterton comments on the use of the word 'surrounded' but has failed to read the sentence properly as it clearly qualifies the meaning of surround by referring to it 'on two sides' so it is evident that surrounded does not mean 'all round'. Also there is no contradiction between paragraph 3.68 (h) and 3.70 as they are referring to different matters. Paragraph 3.68 is describing the perception of the Site 'in the local landscape' i.e. immediate surrounds, whilst paragraph 3.70 describes the character of the Site itself i.e. open character and extent of views or visibility of the Site which is 'localised'.
- 2.28 Paragraph No's.22 to 27, set out Charles Potterton's conclusion on the Site based on a "finer grain analysis of the constraints and opportunities of the Site" and identifies four distinct Areas A to D. This commentary is noted but it is unclear how these conclusions were reached, what method was used and there is no supporting report or other materials. Without this supporting information these conclusions are based on 'opinion' and not evidenced.
- 2.29 In response I would comment as follows:
- a) It is agreed that this Area A has the potential to accommodate development but it is unclear why the development needs to be drawn following the eastern edge of the barns. The CLR refers to 'significant harm' but without the assessment methodology and definition of terms it is unclear what is meant by significant harm. Also the drawing of a line to the eastern edge of the barns follows an arbitrary line and ignores the fact that Templecombe already extends well beyond the farm buildings on East Street and when the Site is viewed from the surrounding area, Templecombe also extends further to south on Combe Hill and connecting these two areas of development would result in the 'logical rounding off' of Templecombe and would be in keeping with existing settlement patterns.

- b) Comments in respect to Area B are not agreed and disputed, partly for the reasons set out above regarding logical rounding off. In addition, a proper assessment of the development proposals including proposed mitigation measures (such as layout and design, open space provision and landscape planting), needs to be undertaken in order to understand the impacts and significance of landscape and visual effects. This assessment has not been undertaken by Charles Potterton although he reaches the conclusion that it would be harmful.
  - c) It is agreed that Area C is a sensitive part of the Site and the development proposals for the Site have always avoided significant development within this area. It should be noted that the Illustrative Masterplan Drawing 406 Rev J retains this area in open uses and includes areas of planting and informal use.
  - d) It is agreed that Area D is well related to properties on the High Street and East Street. However, Charles Potterton's comment regarding the scope for development ignores the comments from HE (i.e. wider rural context and views) and would place development close to the PROW increasing its likely impact on any user of the footpath. For these reasons, the earlier and current Illustrate Masterplans have retained this area in open uses and landscaping.
- 2.30 Paragraph No.28 appears to be a reiteration of earlier points and highlights that these conclusions are Charles Potterton 'opinion' based on a cursory assessment of the Site and its surroundings rather than a detailed assessment of the landscape and visual issues relating to the Site and proper assessment of the impacts of the scheme to inform the decision maker and informs the planning balance that determines whether the form of development is acceptable.

### 3.0 CONCLUSIONS AND RECOMMENDATIONS

3.1 On the basis of the above review of the CLR, the following conclusions can be drawn:

- a) That the CLR is does not follow any recognised approach or methodology to review landscape and visual appraisals and does not adhere to "Technical Guidance Note 1/20", published by the Landscape Institute;
- b) That it is uncertain what approach or method was used to undertake the assessment of the Site in order to reach the judgements and conclusion made on the sensitivities of the Site and likely landscape and visual impacts;
- c) That the CLR is based on a cursory assessment of the Site and judgement reached relating to areas of the Site suitability for development are not supported by analysis or evidence and are 'opinions' of the author;
- d) Lastly in a number of places in the CLR, the word 'acceptable' is used. However, it is not for the landscape consultant to advise on the acceptability of the proposed development, that is for the decision maker (Planning Officer or Planning Committee) after taking into account all of the relevant material considerations of the application, rather is the role of the consultant to check the method used accords with GLVIA3, that the process is followed, check the baseline, content and finding of the assessment, whether it is complete i.e. error or omissions, and whether the assessment is clear and consistent and if the levels of effects has been addressed .

3.2 It is recommended that a meeting be held with Charles Potterton and the Council and the above points put to them, verbally, to see whether there is a way forward to resolving landscape issues. If not then this note as written should be submit to SSDC .

**APPENDIX A -** Landscape Institute – Technical Guidance Note 1/20,  
dated 10 January 2020

## **Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs)**

Technical Guidance Note 1/20 (10 Jan 2020)

The purpose of this guidance is to establish a framework for carrying out reviews of LVIAs and LVAs, analysing in a structured and consistent way if the assessment reflects the approach advocated in GLVIA3 and has led to reasoned and transparent judgements. Use of this framework should in due course further raise the standard of assessments

# 1. Introduction

The third edition of the *Guidelines for Landscape and Visual Impact Assessment* (GLVIA3) was published in April 2013. It has been widely welcomed, accepted and adopted for use in assessing the effects of projects on landscape and visual amenity and since publication been promoted by Landscape Institute (LI) training events.

GLVIA3 sets out that assessment of effects on the landscape and visual resource that may result from a development proposal may be undertaken formally as Landscape and Visual Impact Assessment (LVIA) typically as part of an Environmental Impact Assessment (EIA) or less formally as a Landscape and Visual Appraisal (LVA). The LI strongly recommends that GLVIA 3 is followed when undertaking these assessments and that the resulting LVIA and LVA should be objective with clear thinking, easy to follow, and demonstrate how they have informed appropriate siting, design, and mitigation.

The main difference between an LVIA and LVA is that in an LVIA the assessor is required to identify 'significant' effects in accordance with the requirements of Environmental Impact Assessment Regulations 2017, as well as type, nature, duration and geographic extent of the effect whilst an LVA does not require determination of 'significance' and may generally hold less detail.

In the case of LVIA, The Regulations have further implications for landscape professionals:

- Reg. 18 (5) stipulates that the developer must ensure that the ES is prepared by '*competent experts*' and that the developer must include a statement "*outlining the relevant expertise or qualifications of such experts*".
- Reg 4 (5) places obligations on the relevant planning authority or the Secretary of State because they "*...must ensure they have, or have access as necessary to, sufficient expertise to examine the Environmental Statement.*"

Note that the terms 'competent expert' and 'sufficient expertise' are not defined in the EIA Regulations. The Landscape Institute, in the absence of formal certification of specific competence, considers that a 'competent expert' would normally be a Chartered Member of the Landscape Institute who, has substantive experience of undertaking and reviewing LVIA. This may be evidenced by the assessor's CV, by reference to previous assessments, and by endorsement by other senior professionals.

Following on from GLVIA3, which focusses on how to *undertake* LVIA/LVA, this document provides guidance on how to *review* LVIA or LVA prepared by others. Such review may be undertaken from within the organisation which produced the LVIA/LVA, e.g. as part of a QA process, or by third parties on receipt of LVIA and LVA, such as landscape and or planning professionals in public sector bodies.

This guidance sets out a framework for carrying out such reviews in a structured and consistent way that reflects the approach to assessment advocated in GLVIA3 and use of it should further raise the standard of assessments.

## 2. Existing advice and guidance

GLVIA3 Chapter 8, under the heading “Review of the landscape and visual effects content of an Environmental Statement”, says:

*“8.35 Competent authorities receiving Environmental Statements will often subject the documents to formal review of both the adequacy of the content and of their quality. The review process will usually check that the assessment:*

- *meets the requirements of the relevant Regulations;*
- *is in accordance with relevant guidance;*
- *is appropriate and in proportion to the scale and nature of the proposed development;*
- *meets the requirements agreed in discussions with the competent authority and consultation bodies during scoping and subsequent consultations.*

*8.36 The summary good practice points in this guidance should assist in review of the landscape and visual effects content of an Environmental Statement. In addition, several existing sources may also help anyone involved in reviewing this topic to decide what to look for:*

- *IEMA has developed a series of general criteria for reviewing Environmental Statements and registrants for the EIA Quality Mark<sup>1</sup> must meet the criteria...*
- *The former Countryside Commission published criteria for reviewing the landscape and countryside recreation content of Environmental Statements...*
- *Appendix 1 of Scottish Natural Heritage’s Handbook on EIA<sup>2</sup> contains useful tests to help judge the landscape and visual effects content of Environmental Statements...”*

In addition, European Commission guidance on ES review<sup>3</sup>, published in 2001 and, although directed at whole ES review rather than topic specific review, has also provided useful pointers.

This review framework has been developed in this context.

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<sup>1</sup> IEMA EIA Quality Mark, IEMA website: <https://www.iema.net/eia-quality-mark> [accessed 200110]

<sup>2</sup> Scottish Natural Heritage, *A handbook on environmental impact assessment v5*, 2018, SNH website: <https://www.nature.scot/sites/default/files/2018-05/Publication%202018%20-%20Environmental%20Impact%20Assessment%20Handbook%20V5.pdf> [accessed 200110]

<sup>3</sup> European Commission, *Guidance on EIA-EIS Review*, Luxembourg: Office for Official Publications of the European Communities 2001 ISBN 92-894-1336-0, EC website: <http://ec.europa.eu/environment/archives/eia/eia-guidelines/g-review-full-text.pdf> [accessed 200110]

### 3. Carrying out the review

There are three main components of a review of a LVIA or LVA leading to a report containing the overall conclusion in respect of the completeness, competency and reliability of the LVIA/LVA.

- 1. Checking the methodology used to undertake the assessment, the criteria selected (including balance between), and the process followed;**
- 2. Checking the baseline, content and findings of the assessment;**
- 3. Checking the presentation of the assessment findings.**

As a starting point when undertaking a review, the reviewer will need to define the structure and process to be followed by for example setting out a set of headings or questions against which the LVIA or LVA is examined. Setting out standard or systematic questions will allow consideration being given to each step and each element covered in the assessment. The “good practice” bullet points at the end of each chapter in GLVIA3, noted above, may provide a starting point for such an approach. It is also important to bear in mind the principle of proportionality (cf. EIA Directive). Both the LVIA (or LVA) and the Review should have a defined scope and level of detail which is proportionate and reasonable to allow an informed decision to be reached.

In order to improve consistency and quality of reviews of LVIA's and LVAs the Landscape Institute has produced this framework. Those who undertake reviews should follow this framework and modify or adapt the framework to the Review being carried out and set out the reasons for such modifications.

#### **Step 1. Checking methodology, criteria and process**

In this phase, the reviewer will check the methodology, scope and process used in the assessment and how these relate to GLVIA 3. This involves reviewing the following:

- a) Does the scope of the assessment meet the requirements set out in the Scoping Opinion and/or as defined in the LVIA or LVA and if substantively different, are the reasons clearly set out and explained?
- b) What consultations have been carried out and have responses been acted upon?
- c) Has the scope and methodology of the assessment been formally agreed with the determining authority? If not, why not?
- d) As part of the methodology, has the terminology been clearly defined, have the criteria to form judgements including thresholds been clearly defined and have any deviations from good practice guidance (such as GLVIA3) been clearly explained?
- e) Does the assessment demonstrate a clear understanding and provide a separate consideration of landscape and visual effects?
- f) Does the assessment demonstrate comprehensive identification of receptors and of all likely effects? and
- g) Does the assessment display clarity and transparency in its reasoning, the basis for its findings and conclusions?

## Step 2. Check the baseline, content, and findings of the assessment

As part of this stage in the review process the reviewer will consider the description of the baseline, both in narrative as well as in illustrations by plans, photographs and drawings etc. This may also include publicly available aerial photography, books, online resources, local plans and management plans.

The reviewer may also consider that a site visit may be necessary either to complement or to verify baseline information. The site visit and potential visits to viewpoints are also useful to check actual findings of the assessment.

This stage of the review typically includes further tests:

- a) What is the reviewer's opinion of the scope, content and appropriateness (detail, geographic extent) of both the landscape and the visual baseline studies which form the basis for the assessment of effects (supported by appropriate graphic such as ZTVs etc as appropriate)?
- b) Has the value of landscape and visual resources been appropriately addressed (including but not necessarily limited to) considerations of: local, regional and national designations; rarity, tranquillity, wild-land and valued landscape?
- c) Have the criteria to inform levels of sensitivity (both landscape and visual) and magnitude of change have been clearly and objectively defined, avoiding scales which may distort reported results?
- d) How well is the cross-over with other topics, such as heritage or ecology, addressed?
- e) Is there evidence of an iterative assessment-design process?
- f) Is it clear how the methodology was applied in the assessment, e.g.: consistent process, use of terms, clarity in reaching judgements and transparency of decision-making?
- g) How appropriate are the viewpoints that have been used?
- h) How appropriate is the proposed mitigation, both measures incorporated into the scheme design and those identified to mitigate further the effects of the scheme, and mechanisms for delivering the mitigation?
- i) What is the reviewer's opinion of the consistency and objectivity in application of the criteria and thresholds set out in the methodology for assessing the sensitivity of receptors, the magnitude of changes arising from the project, the degree/nature of effects, and the approach to judging the significance of the effects identified, in the case of EIA projects?
- j) What is the opinion on the volume, relevance and completeness of the information provided about the development or project including, where relevant, detail about various development stages such as construction, operation, decommissioning, restoration, etc.?
- k) Does the document clearly identify landscape and visual effects which need to be considered in the assessment? and
- l) Have levels of effect have been clearly defined and, in the case of LVIA, have thresholds for significance been clearly defined and have cumulative landscape and visual effects been addressed?

### **Step 3. Critique of the presentation of the findings of the assessment**

This phase is perhaps the most straightforward. It involves examining the ‘presentation’ of the assessment including report text, figures/ illustrations, visualisations, and other graphic material forming the LVIA or LVA, and answering the following:

- a) Does the LVIA/ LVA display transparency, objectivity and clarity of thinking, appropriate and proportionate communication of all aspects of the assessment of landscape and visual effects, including cumulative effects.
- b) Have the findings of the assessment been clearly set out and are they readily understood?
- c) Has there been clear and comprehensive communication of the assessment, in text, tables and illustrations?
- d) Are the graphics and/or visualisations effective in communicating the characteristics of the receiving landscape and visual effects of the proposals at agreed representative viewpoints?
- e) Are the graphics and/or visualisations fit for purpose and compliant with other relevant guidance and standards? and
- f) Is there a clear and concise summation of the effects of the proposals?

### **Overall Conclusion: Report the review**

The final step of the review process is to use the reviewer’s findings to draft a short report which would include (but need not be limited to):

1. Confirmation of the brief issued to the reviewer setting out the scope of the review;
2. A summary of how the review was undertaken);
3. A summary of findings of the review of the assessment methodology;
4. A summary of findings of the review of the scope of the assessment;
5. A summary of findings of the review of the actual assessment of effects;
6. A summary of findings of the presentation of the assessment;
7. A summary statement by the reviewer in respect of appropriateness, quality, comprehensiveness, compliance and conformity with relevant guidance and regulations;
8. Recommendations for further information to be sought (if necessary); and
9. Overall conclusions on the adequacy of the assessment and whether it is sufficient to support making an informed planning decision.

The report can also include further information not covered here but relevant to reporting on the compliance (or otherwise) of the LVIA or LVA with GLVIA3 or matters of competence or expertise. This guidance provides a summary framework for reviewing and reporting only; the Landscape Institute continues to regard GLVIA3 as the primary source of guidance for undertaking LVIA’s and LVAs.

## 4. Further information

For further information or to provide feedback on the guidance in use, please refer to the Landscape Institute's website, using the search terms GLVIA. At the time of publication, material is likely to be found in the following section: <https://www.landscapeinstitute.org/technical/glvia3-panel/>

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Authored by Mary O'Connor FLI on behalf of the GLVIA Panel and approved by LI Technical Committee  
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