

Tyler Grange Comments 15.07.2020

Application No: V/20/87717

Address: Land West of, Horton Heath

Description: Scoping opinion under article 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for the development of up to 2,500 No. Residential Dwellings, the associated access, local employment, local retail, leisure and community facilities, primary school and supporting amenity space, landscaping, green infrastructure and sustainable drainage system (Known as One Horton Heath)

Landscape Officer Comments 15/05/20

Geographical Scope

With reference to para. 14.2.33 -14.2.34 and also Appendix 14

a) If fieldwork has shown the Visual Envelope is less extensive than suggested on the ZTV then I would expect to see representative photographic viewpoints to demonstrate this, and for these to be included in the Scoping report Appendix. Please could this be addressed?

b) The ZTV and viewpoints plan Appendix 14.2 shows the Study Area as a circular dashed line. Both the descriptive text in the Scoping Report and the Plan indicate that the Study Area (Geographical Scope) has been decided purely on the Visual Envelope.

In LVIA it would be common for the Visual Envelope to be smaller the Study Area as a whole. This is because the LVIA is assessing both Landscape and Visual Impact. Effects upon a Landscape as a resource needs to be considered at the appropriate scale for that specific resource, which may exceed the Visual Envelope. It also needs to consider potential impacts on adjoining Landscape Character Areas, even if these are scoped out at an early stage.

The study should maximise the opportunity to inform a strategic masterplan that fits well into the landscape context. Without making these strategic assessments, opportunities will be lost to the design process.

This is discussed in detail in GLVIA3 Chapter 5 para 5.2

Action: Please address this in the Scoping Report and adjust the Study Area accordingly. Please plot the Study Area on a plan which also shows the Borough scale Landscape Character Areas and include this in the Appendix with the other plans.

Response:

Comment A

The Representative photoviewpoints included on the "Proposed Viewpoint Locations and Additional Local Authority Locations" drawing at Appendix 14.2 have been included to demonstrate the extent of visibility of the site from areas within the ZTV. These include additional views requested by the LPA through previous scoping.

It is our preferred approach to include viewpoints to demonstrate the extent of visibility rather than include an area or lines on the drawing that define a visual envelope. This is because it

is not always possible to ascertain an accurate of the envelope due to lack of access to some areas.

Some of the more distant viewpoints on the lower-lying land to the northwest (photoviewpoint 2 and additional viewpoints A and B) and from within Hatch Grange, West End (additional viewpoint D) demonstrate that the site area is NOT visible. These are situated outside the proposed Study Area.

Action:

The Photoviewpoints will be annotated to demonstrate those from which the site is visible, as well as those that fall beyond the visual envelope, and are within the ZTV.

Comment B

As set-out in GLVIA3 at paragraph 5.2 that, when scoping the Study Area in respect of landscape that:

“This will usually be based on the extent of Landscape Character Areas likely to be significantly affected either directly or indirectly (Tyler Grange emphasis). However, it may also be based on the extent of the area from which the development is potentially visible, defined as the Zone of theoretical Visibility, or a combination of the two.”

In this instance, it is considered that a combination of both the ZTV and Landscape Character Areas is appropriate. The LVIA will consider the borough character areas and whether those beyond the site area are likely to be significantly affected when scoping the assessment in light of the strategic masterplanning of the proposals and potential landscape effects.

Action:

To ensure that the LVIA considers the published borough landscape character areas (LCA), the Study Area will be increased to include those character areas adjacent to the site and land within the ZTV. This will also capture the extent of the ZTV and Proposed Photoviewpoints. **[See Figure 14.6 attached]**

The Study Area will also be illustrated on a separate plan that shows the Area in relation to the full extent of the adjacent LCAs as defined in the Eastleigh Borough Landscape Character Assessment, namely:

- Horton Heath Undulating Farmland (within which the site lies);
- Knowle Hill Farmland and Woodland(to the east)
- Upper Itchen Valley (to the northwest
- Lower Itchen Valley Floodplain (to the west);
- Oaklands Woodland and Parkland (to the southwest); and
- M27 Corridor (to the south)

Temporal Scope

Ref 14.2.35 This proposes the LVIA is carried out in winter. Whilst this is best practice, it is also useful to have both a winter and a summer study.

I am concerned that if the LVIA is not carried out until winter, then it will be out of step with the production of the Masterplan. The LVIA is used at its full potential when used as an iterative design tool therefore the information it generates needs to be available to the design team in a timely manner.

A summer LVIA can also help illustrate the potential for GI in setting the development and demonstrating how it functions with Topography to enhance placemaking and local distinctiveness. It can highlight features in the landscape which may appear less obvious or significant during winter.

Action: I would like the Scoping Report to consider undertaking a summer study as well as during winter.

Response:

The LVIA includes a set of wintertime photographs. However, the assessment will not be limited solely to a “winter study”.

The photographs were taken during the winter to allow the assessment to establish the maximum extent of intervisibility when the trees and hedgerows are out of leaf. This allows the assessment to take account of the “worst case scenario” in terms of visibility of the proposed development.

Action:

The LVIA will also include a set of summer photographs with the trees in leaf. This also ensures a thorough understanding and analysis of the baseline character and key features within the local landscape, as well as the settlement and infrastructure in the area.

Impacts and Effects

Ref 14.4

a) Action: As set out in 2b above please add neighbouring LCA's to Landscape Receptors.

b) Discrete landscape elements have been identified as Landscape Receptors. It would be helpful to also look at how this can be framed from a holistic Green Infrastructure perspective. Therefore not only looking at the effects on the individual elements but also packaged as GI ‘typologies’ or systems. For example; a hedge with some mature tree in it and wildflower meadow at its base, or perhaps with a drainage ditch alongside, is a richer feature in landscape terms with a higher intrinsic value than assessing at a hedge in isolation. Some thought should be given to how these can be defined and assessed this way.

The purpose of this approach is not to needlessly create complexity. It is to serve the purpose of the LVIA as a design tool that makes visible the key elements of Local

Distinctiveness; and allows these to inform the site design at Strategic and Detailed levels as well as to inform the best and most effective approach for mitigation of residual effects.

Action: Review landscape receptors and provide criteria for GI typologies or systems.

Response:

The landscape receptors will be updated to include GI Typologies. The key Landscape Character Areas which will be assessed are identified on Plan **11705/P23**:

- Northern Quobleigh Character Area
- Southern Chalcroft Character Area

Within these key character areas are a number of 'GI Typologies' as identified on Plan **11705/P23**.

Mitigation

Ref 14.5: This section needs to be revisited because it talks about mitigation being included in Parameter plans which I understand have already been designed. It needs to be re-written to be in line with the true delivery timeframe for the Masterplan. It should address how iterative design and mitigation proposals generated by the LVIA will engage with and inform the Masterplan process.

Chapter 4 in GLVIA3 gives guidance on LVIA and the design process and should be referred to.

Action: Review the section on Mitigation to bring it in line with design schedule.

Response:

The section on Mitigation will be revised to refer to Chapter 4 of the GLVIA3 and also emphasise that the iterative design process and evolution of the masterplan has been informed by the baseline studies and opportunities and constraints identified through an understanding of the key characteristics, features and landscape and visual sensitivities associated with the site and Study Area.

The landscape and visual mitigation will be inherent to the proposals, including the parameters which are being tested by the LVIA.

Appendix 14 – Methodology

a) Terminology – 'Susceptibility'. Having referred to GLVIA3 the guidance describes this as 'Susceptibility to Change'. I suggest the wording in this methodology is altered to match as it will read with more clarity.

b) Under the heading 'Landscape Value' there is a very confusing copy error. The text describes 'Landscape constriction'. Having checked the document reference GLVIA3 Box 5.1 I see this is supposed to read 'Landscape Condition'. Please correct.

Action: a) and b) Edit copy errors

c) Table 5 Significance of Effects

I am uncomfortable with the assessment scale as I think it is too open to subjectivity and creates potential for unresolvable conflicting conclusions between parties.

The methodology has elected to use a value judgement, (from adverse to beneficial) which is not something that is suggested or endorsed in GLVIA3 or in the subsequent 'Statements of Clarification' which address assessment Significance.

(These are issued by the Landscape Institute and available to view on their website <https://www.landscapeinstitute.org/technical-resource/glvia3-clarifications/>)

For example: in using the scale given in the Scoping Report methodology, it is quite easy to envisage a scenario in which a development proposal both:

would cause substantial permanent loss or alteration to one or more key elements of the landscape, to include the introduction of elements that are prominent (moderate adverse)

and also;

would complement the scale, landform and pattern of the landscape, whilst maintaining the existing character (minor beneficial).

This thereby creates grounds for highly subjective differences arising between parties as to whether this means it *would result in minor improvements to the existing views;* or

would be clearly visible and would result in adverse effects upon the landscape. (moderate adverse)

There is no clear yes/no type conclusion in these cases and this kind of debate is not productive. This is especially the case under the circumstances of this development, which already has outline consent. Therefore the best use of the assessment is to create as clear as possible a view of the Significance of Effects (balancing Sensitivity of Receptor against Magnitude of Change to give an assessment of Significance of Effects) and use this to manage change in the landscape for the best possible outcome for the quality of the Masterplan proposals as a whole, within its; strategic context.

Action: Please review this section of the assessment methodology and propose a new scale to describe Significance of Effects (GLVIA3 para 3.27 sets out best practice principles for criteria so I will not reiterate those here). Do not use a value judgement with regard to the change being 'beneficial' or 'adverse'.

Response:

Tyler Grange do not agree with the assertion that assessment scales introduce too much subjectivity, or that a judgement of whether effects are beneficial or adverse should not be used.

The methodology has been developed as a guide to the assessment process, in order to ensure that there is a structure and degree of transparency to the assessment which is based on clear judgements. It is not intended as a "one size fits all" approach that weights criteria. The methodology seeks to provide clarity, whilst not providing a formulaic approach.

This is in line with GLVIA3 which states that the reasoning behind judgements should be clear with an emphasis on narrative and descriptive text.

Whilst GLVIA3 does acknowledged that it is not essential to establish a series of thresholds for different levels of significance of landscape and visual effects, it states that:

“If, however, more distinction between levels of significance is required a word scale for degrees of significance can be used (for example a four-point scale of major/moderate/minor/negligible).”

The above is reflected at paragraph 3.27 of GLVIA3 which states that, when assessing the identified effects against criteria of significance:

“Word scales, with ideally three or four but a maximum of five categories, are preferred as the means of summarising judgements for each of the contribution criteria”

However, GLVIA3 does recognise that it is necessary to identify whether effects are significant or not within an ES Chapter undertaken as part of an EIA.

At the conclusion of Chapter 3, GLVIA3 clearly states the following when summarising the advice on good practice:

“All types of effect should be identified, and for each effect a judgement should be made about whether it is positive/beneficial or negative/adverse.”

Action:

Whilst the criteria and descriptions included in the proposed methodology are only indicative, if there continue to be concerns regarding these they can be removed to avoid the potential for conflicting conclusions being made.

In either case, the LVIA will provide a considered narrative that explains the judgements and reasoning behind the assessment of significance. This will be sufficient to inform the LVIA and provide a robust and sound assessment.

However, as stated by GLVIA3 the LVIA will need to be able to identify both adverse and beneficial effects, as well as their level of significance.

From: [Harwood, Alice](#)
To: [Rose Perkins](#)
Cc: [Robert Hughes](#); [Peter Warren](#); [Errington, Dawn](#)
Subject: RE: Request for meeting to discuss EIA scoping response - Horton Heath Landscape Inputs
Date: 30 July 2020 13:21:14
Attachments: [image001.png](#)
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[image016.png](#)
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[image322118.png](#)
[image486227.png](#)
[image737111.png](#)
[image478377.png](#)

Hi Rose/all –

Apologies for my late follow-up to our conversation.

However I am happy to proceed as discussed. As noted I still consider there is area of debate on the value judgement aspect, however as your process is clearly set out and justified by GLVIA3 no problem to proceed as proposed and I am interested to see how you work with these criteria as the work evolves, it will be an interesting process.

Many thanks,

Alice

Alice Harwood

Principal Landscape Officer

Service Delivery - Specialist Services - Housing and Development

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A direct phone call may not be answered.**

023 8068 8353



Eastleigh Borough Council | Eastleigh House | Upper Market Street | Eastleigh | SO50 9YN

From: Rose Perkins <rose.perkins@tylergrange.co.uk>
Sent: 16 July 2020 20:50
To: Harwood, Alice <Alice.Harwood@eastleigh.gov.uk>
Cc: Robert Hughes <r.hughes@tylergrange.co.uk>; Peter Warren <PWarren@savills.com>
Subject: RE: Request for meeting to discuss EIA scoping response - Horton Heath Landscape Inputs

Hi Alice,

Please find attached comments and plans to discuss at tomorrows meeting. Apologies for sending these late in the day.

Kind regards

Rose



[Rose Perkins BA\(Hons\) MA CMLi](#)
Senior Landscape Consultant

m 07399053777
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From: Harwood, Alice <Alice.Harwood@eastleigh.gov.uk>
Sent: 16 July 2020 11:12
To: Rose Perkins <rose.perkins@tylergrange.co.uk>
Subject: RE: Request for meeting to discuss EIA scoping response - Horton Heath Landscape Inputs

Hi Rose,

You mentioned plans and comments to be sent prior to the meeting – do you have those please? If sent too close to the meeting time I can't guarantee I will have time to review.

Thanks,

Alice

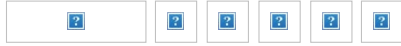
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From: Rose Perkins <rose.perkins@tylerrange.co.uk>

Sent: 07 July 2020 17:43

To: Harwood, Alice <Alice.Harwood@eastleigh.gov.uk>

Cc: Robert Hughes <r.hughes@tylerrange.co.uk>; Peter Warren <PWarren@savills.com>

Subject: RE: Request for meeting to discuss EIA scoping response - Horton Heath Landscape Inputs

Hi Alice,

Many thanks for getting back to me. Are you ok to meet on Friday 17th July next week to discuss? If this is ok I'll send round a teams or zoom invite (whichever you'd prefer). Prior to the meeting we'll also send through plans and comments on the scoping response to discuss.

Kind regards

Rose



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From: Harwood, Alice <Alice.Harwood@eastleigh.gov.uk>

Sent: 03 July 2020 16:11

To: Rose Perkins <rose.perkins@tylerrange.co.uk>

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Hi Rose,

I could meet Tuesday 7th between 11am and 15:30; Wednesday 8th after 14:00; and the following week I am currently flexible any day except for Thursday 16th.

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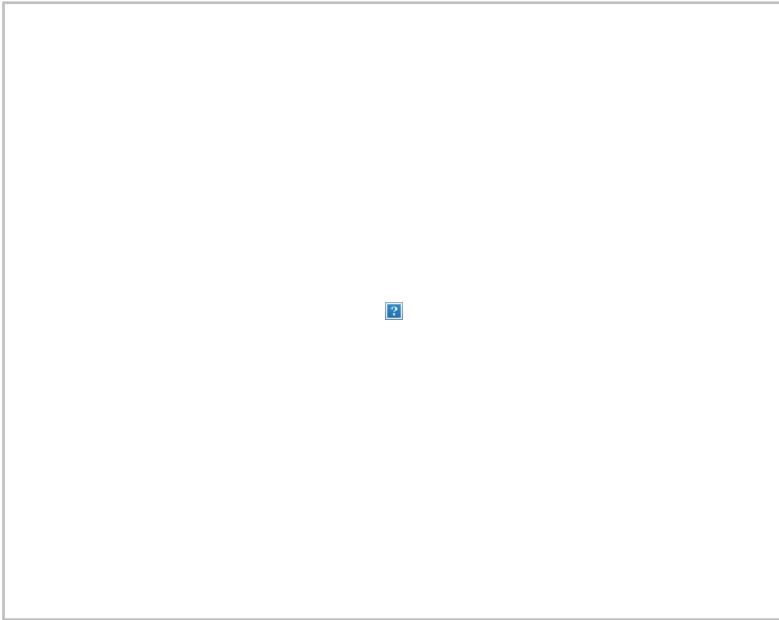
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From: Rose Perkins <rose.perkins@tylergrange.co.uk>
Sent: 26 June 2020 14:03
To: Harwood, Alice <Alice.Harwood@eastleigh.gov.uk>
Cc: Peter Warren <PWarren@savills.com>; Robert Hughes <r.hughes@tylergrange.co.uk>
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Hi Alice,

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As such, please are you able to provide me with your availability over the next week or so, so we can discuss the response with myself, our Technical Director Rob Hughes, and Peter Warren from Savills?

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To: [Harwood, Alice](#)
Cc: [Robert Hughes](#); [Peter Warren](#)
Subject: RE: Request for meeting to discuss EIA scoping response - Horton Heath Landscape Inputs
Date: 16 July 2020 20:49:38
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[Appendix 14.2 Proposed Photoviewpoint Locations and Additional Local Authority Locations April 2020.pdf](#)
[11705_P09a Figure 14.6 Landscape Character_KL_RP.pdf](#)
[11705_P23_P24 Site Specific Character Areas_RP_RH_16072020.pdf](#)
[11705 Scoping Response YG Comments Landscape_15.07.2020.pdf](#)

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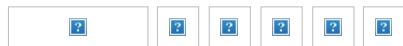
Alice Harwood

Principal Landscape Officer

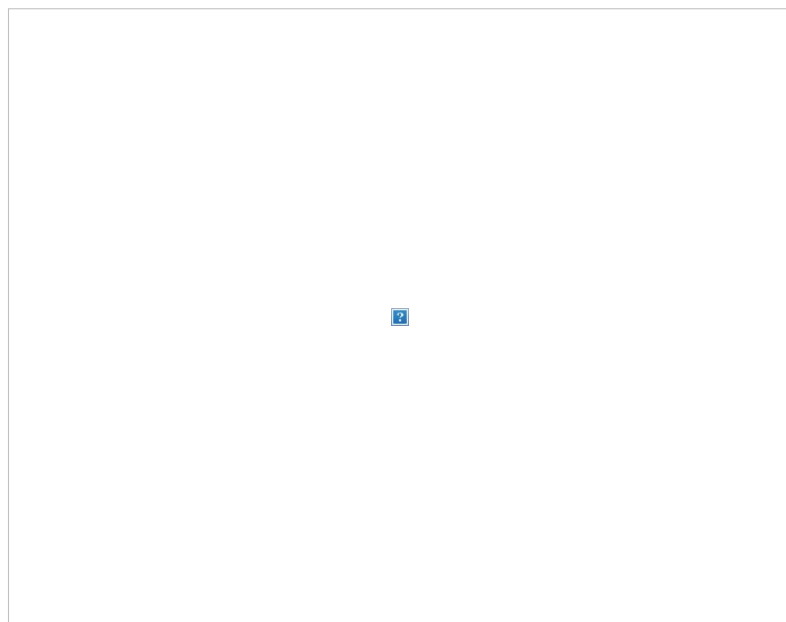
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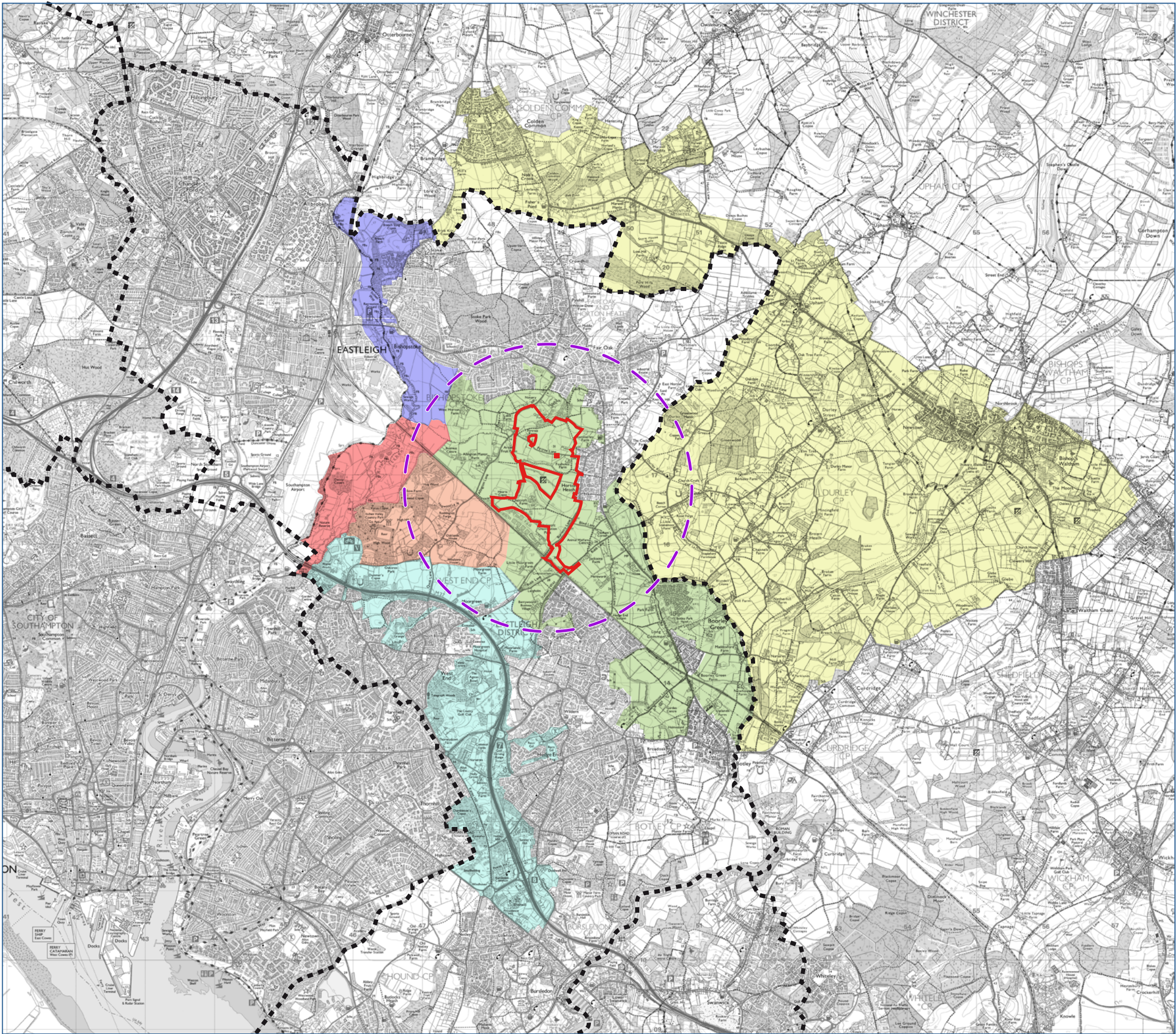
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-  Site Boundary
-  District Boundary Lines
-  Study Area

Landscape Character Assessment for Eastleigh Borough (December 2011):

This assessment has identified 19 Landscape Character Areas (LCA) within the District. The Site is located within LCA 9: Horton Heath Undulating Farmland.

Landscape Character Area:

-  2 - Upper Itchen Valley
-  3 - Lower Itchen Valley Floodplain
-  8 - Knowle Hill Farmland and Woodland
-  9 - Horton Heath Undulating Farmland
-  10 - Oaklands Woodland and Parkland
-  11 - M27 Corridor

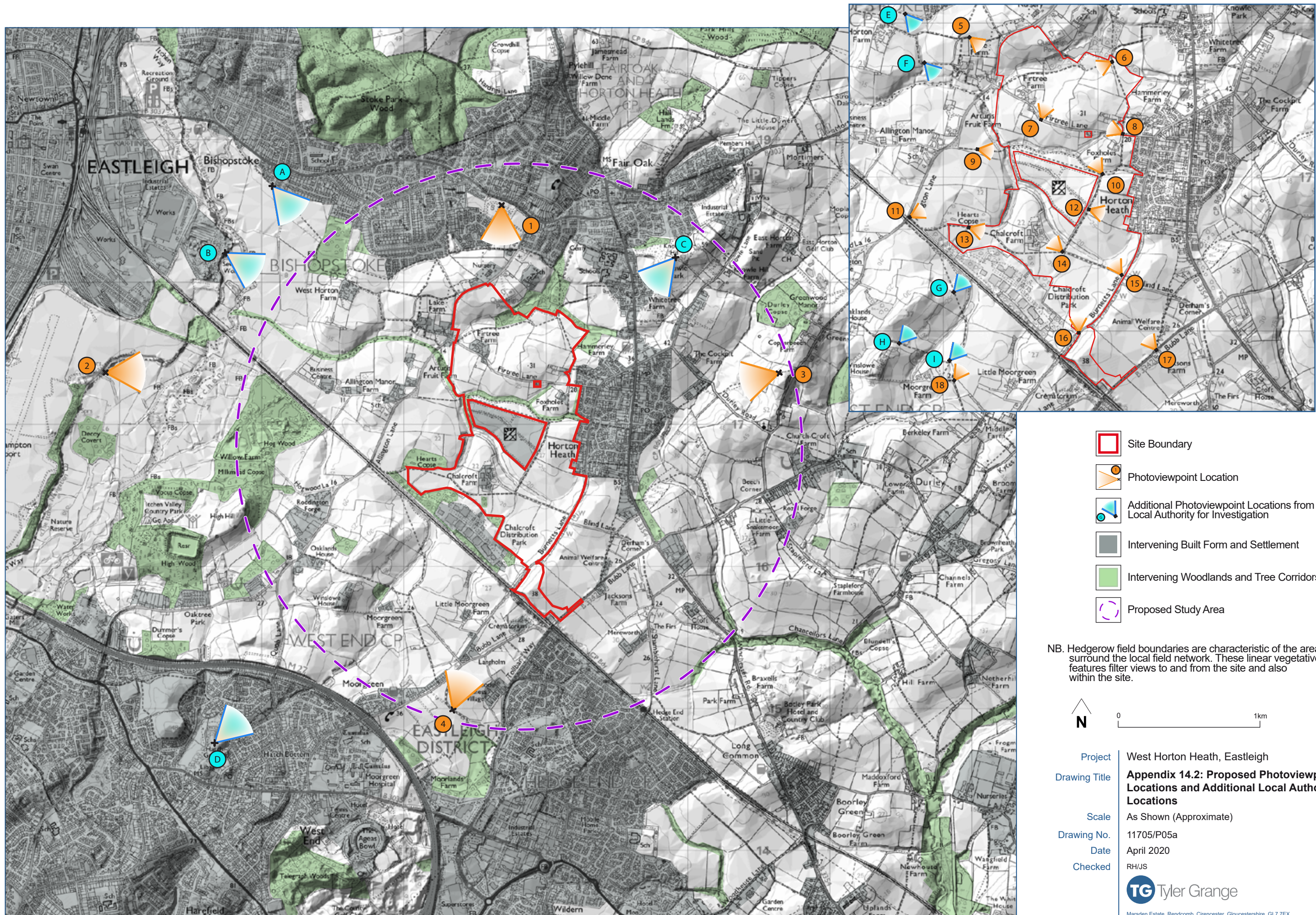
Landscape Character Assessment for Winchester District (March 2004):

-  Durley Claylands



0 1km

Project	West Horton Heath, Eastleigh
Drawing Title	Figure 14.6: Landscape Character - Eastleigh LCA
Scale	As Shown (Approximate)
Drawing No.	11705/P09a
Date	June 2020
Checked	KL/RP
	
Marsden Estate, Rendcomb, Cirencester, Gloucestershire, GL7 7EX T: 01285 831 804 E: info@tylergrange.co.uk W: www.tylergrange.co.uk	



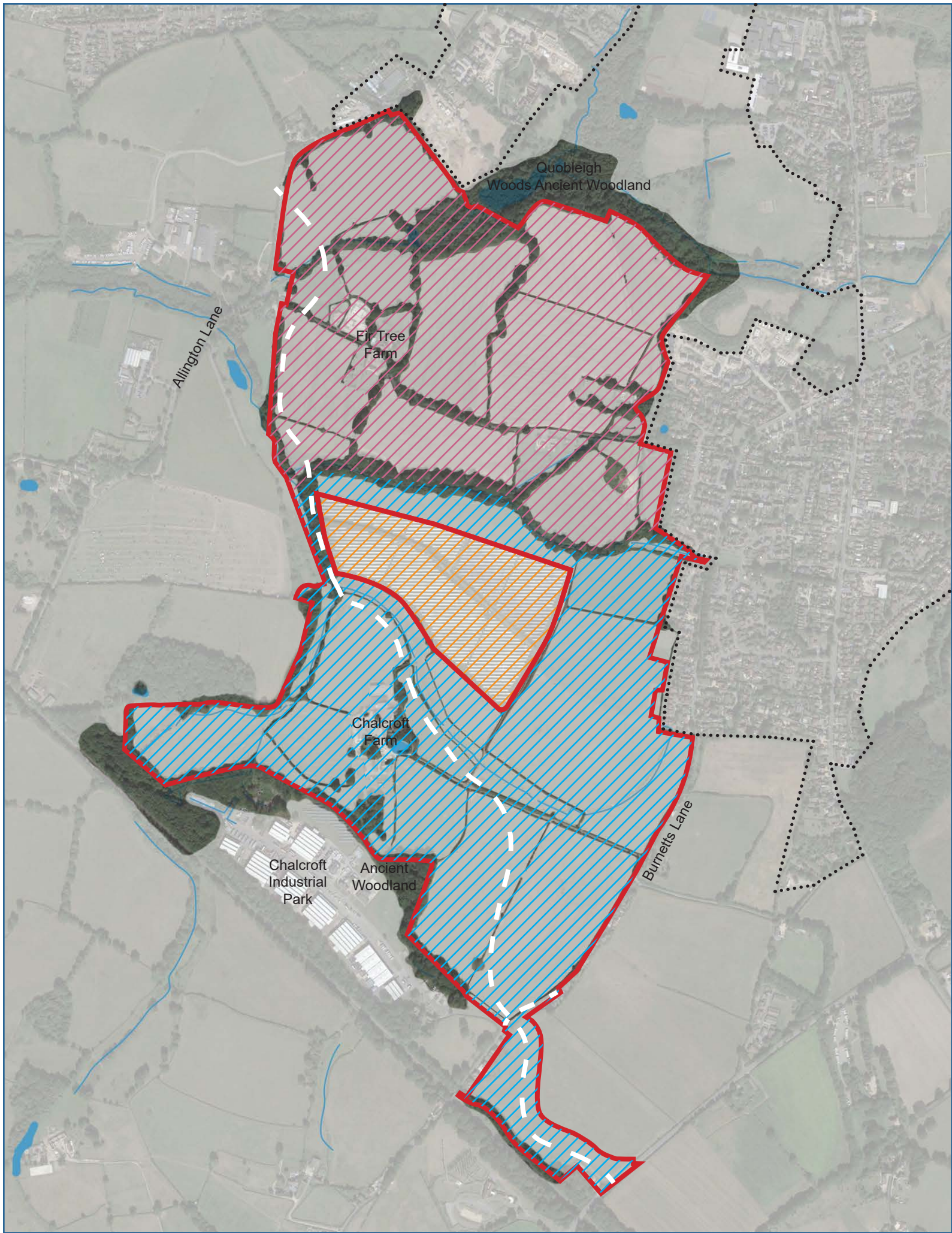
NB. Hedgerow field boundaries are characteristic of the area and surround the local field network. These linear vegetative features filter views to and from the site and also within the site.



Project	West Horton Heath, Eastleigh
Drawing Title	Appendix 14.2: Proposed Photoviewpoint Locations and Additional Local Authority Locations
Scale	As Shown (Approximate)
Drawing No.	11705/P05a
Date	April 2020
Checked	RH/JS



Marsden Estate, Rendcomb, Cirencester, Gloucestershire, GL7 7EX
T: 01285 831 804 E: info@tylergrange.co.uk W: www.tylergrange.co.uk



-  Site Boundary
-  Consented Road Scheme
-  Existing Settlement Edge
-  Solar Farm
-  1.Northern Quobleigh Character Area

- Green Infrastructure Typologies:
- Fir Tree Farm Historic Core
 - Ancient Woodland
 - Field Boundary Tree Belts
 - Hedgerow Boundaries
 - Watercourse

-  2.Southern Chalcroft Character Area

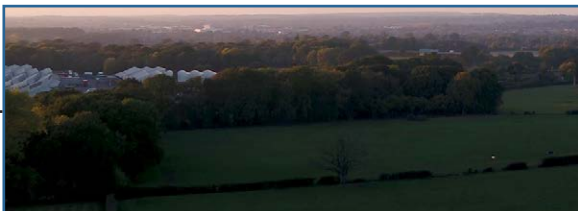
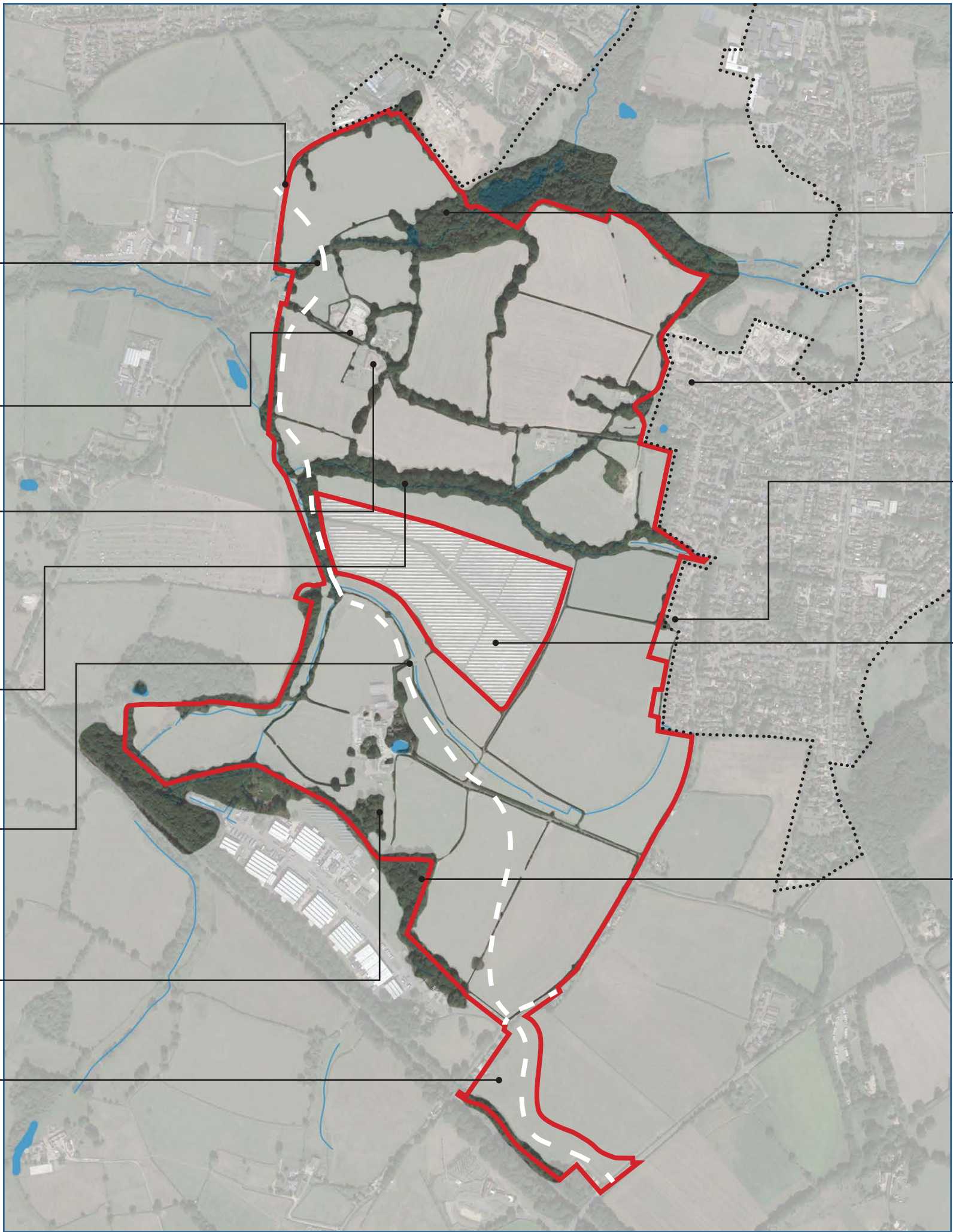
- Green Infrastructure Typologies:
- Chalcroft Farm Historic Core
 - Ancient Woodland
 - Field Boundary Tree Belts
 - Hedgerow Boundaries
 - Watercourse



Project	Horton Heath
Drawing Title	Site Specific Landscape Character Areas
Scale	Not to Scale
Drawing No.	11705/P23
Date	July 2020
Checked	KL/RP



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Project	Horton Heath
Drawing Title	Site Specific Features
Scale	Not to Scale
Drawing No.	11705/P24
Date	July 2020
Checked	KL/RP



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