

Our ref: 2021-413
Your ref:
23rd October 2022

South Norfolk Council
Planning Department
South Norfolk House
Cygnet Court
Long Stratton
Norwich
NR15 2XE

Dear Mr. Courtier,

Deal Farm, Bressingham
Response to SNC comments regarding Landscape and Visual Appraisal.

On behalf of Storengy, I am writing with my review of the comments made by Bidwells consultants on 3rd October 2022.

I consider that the Bidwells response to my Landscape and Visual Appraisal is rather unconstructive and unhelpful, concentrating on technicalities of the report rather than addressing the overall conclusions and key issues.

Essentially, there are two key issues here.

Firstly, the Bidwells report criticises the approach of assessing the scheme in comparison with the approved scheme (Ref: 2015/0595), rather than assessing it in isolation. However, I consider it counterproductive to attempt to assess something hypothetically and retrospectively when it's already there, and on a site where a similar scheme had already been granted and which should be a material consideration in assessing the new scheme.

Indeed, at the time of the original application the Council's Landscape Officer, whilst he had some initial concerns, subsequently reported that '*..the agent has provided responses to my previous comments; generally these are satisfactory...*' with just a few minor technical details which required addressing. Thus, although the current and original schemes are different, the visual impact and effects are similar and, given that a development with a similar significant visual impact – and my opinion no greater impact - has already been approved, it would seem that visual impact was not really considered the major issue here nor one that should prejudice the grant of planning approval.

Furthermore, the Local Planning Authorities have repeatedly granted planning permission for an AD plant on this site or immediately nearby:

- 2013: Planning Permission was granted by Norfolk County Council for a Thermophilic Anaerobic Digestion Plant (ref. C/7/2013/7006)

- 2014: Planning Permission was granted by South Norfolk Council for an Anaerobic Digestion Renewable Energy Facility (ref. 2013/1887)
- 2015: Planning Permission was granted by South Norfolk Council for the construction of a farm agricultural Anaerobic Digestion Renewable Energy Facility (ref. 2015/0595)

Thus, on all occasions the LPA has assessed that the visual impact is outweighed by the benefits and that this is not materially altered in the current application.

Secondly, the Bidwells response is focussed almost solely on the technicalities of the report and methodology, rather than having any bearing on the actual conclusions and proposals on the site. I consider the methodology and depth of detail in my appraisal was *proportionate* for a site on which a scheme of similar scale had already been approved, and the conclusions of which would be the same even if I had done the report in whatever format a different consultant might prefer.

Fundamentally, the Guidelines emphasise the vital importance of professional judgement as a key factor in determining impact. It states that *'while there is some scope for quantitative measurement of some relatively objective matters ... much of the assessment must rely on qualitative judgements, for example about what effect the introduction of a new development or land use change may have on visual amenity, or about the significance of change in the character of the landscape and whether it is positive or negative.'*

The Guidelines are not designed to be a prescriptive template for LVIA, and acknowledge that the form of the assessment will differ for different projects and in particular emphasises again the importance of the *professional judgement* of the practitioner. The Guidelines state, for instance that *'the form of the assessment to be undertaken will depend on the scale and type of the intervention and in the case of development, the associated form that the planning application may take. Unless there are specific regulatory requirements, the principle of proportionality should apply.'* I consider that my report was indeed proportionate to the task in hand.

The process of LVA is therefore to thoroughly assess the scheme in a professional manner, and not simply indulge in a tick-boxing numerical exercise. As the GLVIA states: *'even with qualified and experienced professionals there can be differences in the judgements made. This may result from using different approaches or different criteria, or from variation in judgements based on the same approach and criteria.'*

Thus, the approach to my appraisal, whilst it may be different to the format which another consultant might use, is proportionate to the scale of the project given the previous planning permission, and is valid and based on a thorough understanding of the issues through long professional experience. My approach or methodology has no impact on the material substance and conclusions. The principle of *proportionality* applies.

In terms of the overall conclusions, the Bidwells report states that *'the proposed developments are not considered to be appropriate to the local landscape character. Although the proposed mitigation strategy could mitigate some of the predicted adverse effects, the imposed change will be irreversible and will alter the distinctive rural qualities of the landscape.'* As explained above, planning permission has repeatedly been approved for development of similar scale on the site. It is not disputed that the development has a visual impact, but it must be viewed in the context of the fact that permissions have

already been granted for similar schemes despite the visual impact owing to the unquestionable and outweighing renewable and environmental benefits.

The Bidwells report also criticises the landscape mitigation proposals, in that they are (a) outside the red line boundary and thus not enforceable and, (b) would be out of character and accentuate the presence on the new features within the landscape. Firstly, all the land is in the same ownership, so there is no obstacle to the control and implementation of the planting. It is common, and perfectly acceptable, for off-site landscaping and other works to be secured through a Grampian form of planning condition, which could be imposed here.

Secondly, the landscape here has been degraded over past decades, with field boundaries, hedgerows and trees removed and fields amalgamated. The proposed planting will thus be beneficial in providing some replacement landscape structure. Despite the scale of the development, views toward it are tempered by topography and trees and hedgerow. The new mitigation planting will provide amelioration in the longer term. Hedgerow planting particularly will reduce views toward the development from roads and footpaths.

In response to the specific comments, the following table summarises the response:

CRITERION	RESPONSE	COMMENT	RESPONSE
1 - Overall Approach			
1.1 Is the purpose of the LVA clearly defined?	Yes		
1.2 Are the methodology and terminology clearly explained? Does it align with the GLVIA3 overall guidance?	Yes, partially	Although the GLVIA3 is referred to in the methodology statement (SLVA section 10. Appendix), some terminology and parameters appear to deviate from the guidance (i.e. landscape quality or visual amenity rather than value, landscape capacity referring to susceptibility).	The LVA was intended to demonstrate the proposal in comparison to the extant planning permission, and the terminology used was considered appropriate and proportionate for an LVA of this scale.
1.3 Is the approach to assessment considered proportionate to the proposed development's parameters?	Yes		
1.4 Has pre-application consultation been carried out and the scope and methodology of the LVA agreed with the determining authority?	No	It is understood that no formal pre-application engagement was carried out for this application, nor were informal comments provided by the LPA officers on the scope of the SLVA.	
1.5 Is the LVA clearly structured and presented?	Yes		
1.6 Does the assessment clearly distinguish between landscape and visual effects?	Yes, partially	Landscape effects are not detailed for a set of receptors	The LVA was primarily intended to demonstrate the proposal in comparison to the extant planning permission, the changes in effects of which were primarily visual as the plant occupies a similar site as before, and changes in the landscape effects (compared to the original scheme) were considered minor
1.7 Does the LVA clearly identify landscape/visual receptors and likely effects?	No	There is no definitive list of visual and landscape receptors and associated effects.	The LVA was intended to demonstrate the proposal in comparison to the extant planning permission, and a detailed list of receptors was not considered necessary, given that planning permission for a similar scheme has already been approved
1.8 Does the assessment	Partially	Only for visual effects.	The LVA was not intended to be a full LVIA, given that planning permission for a

state whether the effects are beneficial or adverse?			similar scheme has already been approved and that any such effects have already been considered by the Council. in any event the LVA is robust and comprehensive enough therefore to allow the decision maker to assess the impacts and determine the application
1.9 Does the assessment distinguish between the effects of construction and the completed development?	Partially	In details only for visual effects.	Development was already partially complete when LVA was undertaken. The development is now largely completed and therefore again the LVA is robust and proportionate to address the operational impacts which are of most relevance.
1.10 Where a potential for adverse effects has been identified, has mitigation been proposed and its effectiveness assessed?	Partially	Planting plan is only submitted in detail for the North Lagoon.	Mitigation proposals have been proposed, comprising screen bunding, new hedgerows and tree planting around Deal Farm. These are detailed on plan number 2021-413-005G and within the LVA document.
1.11 Is there evidence of an iterative assessment-design process?	No		Development was already partially complete when LVA was undertaken, so an iterative assessment is not considered appropriate or necessary for these retrospective proposals
2 - Baseline, content and findings of the assessment			
2.1 Is the proposed development adequately presented?	Yes		
2.2 Is the LVA adequately supported by:			
- Maps/plans?	Yes	Although the mapping scale is not consistent with a set study area.	I consider the mapping scale to be appropriate to the scope of the LVA
- Photos?	Yes		
- Visualizations?	No		I consider visualisations which have been prepared give an accurate impression of the proposals in comparison with the approved scheme.
2.3 Does this material comply with good practice (e.g. LI guidance on photography)?	No	Although this review is not carried out by a visualisations' expert, the information provided on the methodology used for the photography (SLVA section 1.7) is considered too general with no reference to the latest LI guidance on technical visualisations.	I consider visualisations which have been prepared give an accurate impression of the proposals in comparison with the approved scheme.
2.4 Is the value of landscape and visual resources appropriately addressed?	No		The LVA was not intended to be a full LVIA, given that any such elements will have already been considered by the Council in granting the previous planning permission
2.5 Has reference been made to published LCAs at the appropriate levels?	Yes		
2.6 Have relevant designations been identified?	Yes		
2.7 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?	No	The parameters set in SLVA section 10.Appendix are not reflected in the assessment.	Although the full methodology was not described in the report, the LVA was undertaken by an experienced practitioner in this field and undertaken according to standard methodology
2.8 Has landscape and visual sensitivity been assessed on the basis of its susceptibility and value? Have the criteria to inform level sensitivity been clearly and objectively defined? Are these criteria applied consistently though out the LVA?	No		The key aim of the LVA was to assess the impact of the proposals in comparison with the approved scheme that was found to be acceptable by the LPA in landscape and visual impact terms, rather than providing a full LVIA which would provide these details

2.9 How appropriate are the viewpoints that have been used? Are these views sufficiently representative?	No	The site visit highlighted the lack in the SLVA of viewpoints representative of sensitive receptors such as ramblers on the local network of Public Rights of Way.	The LVA was intended to demonstrate the proposal in comparison to the extant planning permission, and a detailed list of viewpoints was not considered necessary, given that planning permission for a similar scheme has already been approved
2.10 Has a ZTV/ZVI been produced?	No		Not considered necessary as the structure was already present and visible.
2.11 Have seasonal influences been taken into account?	No		
2.12 Is there a clear and concise summation of the effects of the proposals?	Yes		
2.13 Does the assessment display clarity and transparency in its reasoning, the basis for its findings and conclusions?	Yes		
3 - Additional comments			
3.1 The study area is not clearly defined for either the landscape or visual elements of the appraisal.			The key aim of the LVA was to demonstrate the impact of the proposals in comparison with the approved scheme, rather than a full LVIA, and the study area and viewpoints were selected as representative of the most important viewpoints.
3.2 In addition to point 2.3, there is no information on the printing size/scale of the visualisations in section 6.			The visualisations were intended to be comparative views in a format which can be clearly seen with the context of an A4 report in landscape format. They can be provided in a suitable format with details of the printing size and scale if necessary, but considered unnecessary since the structures are already present and visible, rather than proposed
3.3 There is not a bibliography and documents mentioned in the LVA text have incomplete references (i.e. missing author and date).			The LVA was not intended to be a full LVIA, given the planning history of the site. This does not prejudice the robustness of the report or conclusions reached. A full LVIA would provide a detailed methodology and bibliography

Finally, it would have been most helpful if the Council's own Landscape Officer had been available to make any comments during the process of this planning application, rather than receiving these comments from an external source at this late stage.

In summary:

- The methodology and conclusions of the Landscape and Visual Appraisal were proportionate to the scale of the project and previous planning history of the site.
- Whilst the current application comprises contemporary structures, it presents a contemporary sustainable use close to an existing farm complex, and its impact is considered similar to previous permissions for similar schemes which were approved on the basis that the visual impact was outweighed by the benefits.
- Mitigation planting has been proposed which will reduce the visual impact from close proximity, and further planting, comprising hedgerow and blocks of trees, could be provided to provide wider visual amelioration. The proposed planting will comprise native tree and shrub species in

character with the area, and will restore some of the roadside hedgerows, long extents of which have been lost in past decades, to recreate the traditional hedged lane character of the local roads. Strategic blocks of trees can also be established on the corners of fields to provide further enhancement of landscape structure, without significantly impacting on productive agricultural land.

I believe I have satisfactorily demonstrated the impact of the proposals and would hope that the relevant Planning Officer and Planning Committee can exercise a measured judgement of the evidence.

Yours sincerely,

A handwritten signature in black ink that reads "Luke Broom-Lynne". The signature is written in a cursive, flowing style.

Luke Broom-Lynne BA DipLA CMLI MRTPI
Chartered Landscape Architect and Chartered Town Planner