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Date: 06/12/2022

Mr Tim Baker  
Principal Planning Officer  
South Norfolk and Broadland

Dear Tim

**PLANING APPLICATION 2022/1108 LANDSCAPE COMMENTS**

Following the enclosed comments, which I have provided on the above planning application, I confirm that I would be supportive of reasons for refusal due to significant adverse effects caused by the AD structures on the distinctive rural qualities of the local landscape and on the visual amenity experienced by sensitive receptors at some distance from the site. Similarly, the western lagoon fails to respond appropriately to the local landscape pattern and qualities; therefore, it is believed to cause significant adverse effects on the local landscape character.

Kind regards,

**Martina Sechi**

Associate Landscape Architect, Head of Landscape and Townscape Assessment

**Signed for and on behalf of Bidwells LLP**

**Enclosures: Landscape and Visual Appraisal Review**

Subject: Deal Farm, Bressingham  
From: Martina Sechi  
Date: 03/10/2022  
To: Tim Barker  
CC: Chris Surfleet, Danielle Percy

## LANDSCAPE & VISUAL APPRAISAL REVIEW

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### Anaerobic Digestion at Deal Farm, Bressingham – Planning Application 2022/1108

#### 1.1 Introduction

- 1.1.1 This note provides a peer review of the landscape and visual impact appraisal (LVA)<sup>1</sup> and supplementary landscape and visual assessment (SLVA)<sup>2</sup> submitted with planning application 2022/1108 to South Norfolk Council. This note aims to inform the Local Planning Authority (LPA) determination of the planning application.
- 1.1.2 The agreed brief was to:
- Consider the development proposal presented in the planning application 2022/1108 in its own right, irrespective of the previously granted planning applications which have lost planning consent;
  - Check the methodology applied in the submitted assessments;
  - Check the baseline content and findings of the assessments;
  - Review the adequacy and reliability of the assessment's conclusion and the proposed landscape mitigation; and
  - Provide recommendations on the planning application's appropriateness in landscape and visual terms.
- 1.1.3 This review is based on prevailing best practice as set out in the Guidelines for Landscape and Visual Impact Assessment (Landscape Institute and Institute of Environmental Management & Assessment, Third Edition, 2013)<sup>3</sup> and the Landscape Institute Technical Guidance Note 1/20<sup>4</sup> (10 January 2020). It comprises a series of key questions, presented in the form of a Review Matrix, followed by a brief commentary.
- 1.1.4 The review also considers the guidance provided in the following planning documents:
- NPPF (July 2021)
  - Join Core Strategy For Broadland, Norwich and South Norfolk (January 2014): Policy 1
  - Development Management Policies Document (October 2015): DM1.4, DM 4.5, DM4.8, DM 4.9 and DM 4.1
- 1.1.5 The review is carried out as a desktop exercise and a site visit carried out on the 28<sup>th</sup> September 2022 to gain familiarity with the site and its landscape context, and to test the validity of the LVA and SLVA conclusions. It is noted that the majority of the development proposal has already been unlawfully implemented. Therefore, it was not possible to assess the baseline landscape and visual condition of the site in the absence of development. Google Earth street view (capture image 2011), where possible, was used to understand how the pre-development condition could have appeared.

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<sup>1</sup> Deal Farm, Bressingham Landscape and Visual Appraisal, Broom Lynne, May 2022

<sup>2</sup> Proposed Digestate Storage Lagoons, Bressingham, Norfolk, Broom Lynne, May 2022

<sup>3</sup> Typically known as GLVIA3

<sup>4</sup> Reviewing Landscape and Visual Impact Assessment (LVIA's) and Landscape and Visual Appraisals (LVAs), Landscape Institute Technical Guidance Note (TGN), 10 January 2020

## 1.2 Review Matrix LVA

CRITERION	RESPONSE	COMMENT
<b>1 - Overall Approach</b>		
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?	No	Although largely utilising language typical of the GLVIA3, there is no reference to said guidance and the LVA's methodology is not explained in sufficient detail (LVA section 1.5).
1.3 Is the assessment approach considered proportionate to the proposed development's parameters?	Yes	
1.4 Has pre-application consultation been carried out and 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 LVA.
1.5 Is the LVA clearly structured and presented?	Yes	
1.6 Does the assessment clearly distinguish between landscape and visual effects?	Yes	
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.
1.8 Does the assessment state whether the effects are beneficial or adverse?	Partially	Only for landscape elements.
1.9 Does the assessment distinguish between the effects of construction and the completed development?	No	
1.10 Where a potential for adverse effects has been identified, has mitigation been proposed and its effectiveness assessed?	Yes, partially	There is no evidence that the effectiveness of the landscape mitigation strategy was tested (i.e. no assessment of year 1 and separately year 15 effects).
1.11 Is there evidence of an iterative assessment-design process?	No	
<b>2 - Baseline, content and findings of the assessment</b>		
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.
- Photos?	Yes	
- Visualizations?	Yes	
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 and production of the visualisations (LVA

CRITERION	RESPONSE	COMMENT
		section 8) is considered too general, with no reference to the latest LI guidance on technical visualisations <sup>5</sup> .
2.4 Is the value of landscape and visual resources appropriately addressed?	No	
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	Due to the absence of a clear methodology
2.8 Has landscape and visual sensitivity been assessed on the basis of its susceptibility and value? Have the criteria to inform the level of sensitivity been clearly and objectively defined? Are these criteria applied consistently though out the LVA?	No	
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 LVA of viewpoints representative of sensitive receptors such as ramblers on the local network of Public Rights of Way.
2.10 Has a ZTV/ZVI been produced?	No	
2.11 Have seasonal influences been taken into account?	Yes, partially	Largely in relation to different weather conditions.
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	
<b>3 - Additional comments</b>		
3.1 The LVA assesses the proposal against the previous application 2015/0595, not the undeveloped baseline.		
3.2 The study area is not clearly defined for either the landscape or visual elements of the appraisal.		
3.3 Effects relating to light pollution are considered, and mitigation proposed; however, there is no clear evidence of the amount of lighting produced by the proposed development.		
3.4 There are no references to other submitted reports that would further inform some of the identified effects (i.e. traffic statement in regards to rural road tranquillity).		

<sup>5</sup> Visual Representation of Development Proposals, Technical Guidance Note 06/09, 16 September 2019

CRITERION	RESPONSE	COMMENT
3.5 In addition to point 2.3, there is no information on the printing size/scale of the visualisations in section 9.		
3.6 There is not a bibliography and documents mentioned in the LVA text have incomplete references (i.e. missing author and date)		

### 1.3 LVA Commentary

- 1.3.1 It is believed that the LVA scope should not compare the proposal against the previous application, which has no legal status, but should assess the landscape and visual effects of the proposed development in its own right, therefore against the undeveloped baseline.
- 1.3.2 The LVA is not completely compliant with current guidance and practice. It fails to clearly identify some typical elements and parameters (i.e. landscape/visual receptors, their value and sensitivity) that are critical to fully understand the nature of effects on relevant landscape and visual resources.
- 1.3.3 The lack of a defined study area also appears to reduce substantially the scope of the assessment resulting in a focus solely on local resources. This is particularly evident in the selection of views, which is dismissive of some sensitive receptors. As an example, the site visit identified that views of the development are available from Common Road leading to Druids Lane and the following public footpaths: Bressingham FP3, access to FP13, FP12 and FP5. These viewpoints/receptors are not considered in the LVA.
- 1.3.4 The LVA presentation, albeit generally well organised and logical, also fails to follow some of the general LI guidance, particularly in relation to the technical visualisations. Notwithstanding the statement in section 9.3, which confirms the use of a combination of onsite experience and photography to assess the visual impact, and considering that the proposal is already existing, it is noted that the lack of printing size information appears misleading in the assessment of visual effects. An A4 printed version of the LVA was brought to the site visit, and it was evident that the proposed development appears larger than as presented in the viewpoints panoramas in section 9 of the LVA.
- 1.3.5 Finally, the following considerations are made on the conclusion and findings of the LVA:
- In visual terms, it is agreed with the LVA that the proposed development sits within the existing cluster of Deal Farm and will result in a '*prominent*' and '*bold*' feature in many of the assessed views. However, notwithstanding the weather's influence whereby the domes appear more recessive in overcast conditions, the proposed materiality is not considered sufficient to mitigate visual effects in the initial operational phase (i.e. year 1), such that the visual amenity of sensitive receptors (namely ramblers on local public footpaths and road users on secondary rural roads) will be adversely affected by the introduction of an alien, large scale structure.
  - At year 15, it is agreed that the proposed planting strategy will provide screening of the proposals in local views, namely along Common Road and Bressingham FP3, preserving the visual amenity of the associated receptors. However, it is not believed that in more distant views there would be a successful screening of the proposal, which will still appear as a detracting feature in a substantially rural landscape.
  - In landscape terms, there appears to be some discrepancy between the table within section 10.11 and statements made concerning the visual effects. It is mentioned twice in the table that the proposal has '*limited impact on open views*'; however, sections 10.7, 10.8, and viewpoints 2, 3 and 5 describe the proposal as '*prominent*', which does not suggest a limited impact.
  - It is agreed that the proposal is consistent with the rural activity of the existing farm. However, its architectural qualities are not considered to be consistent with the rural context. Both scale and shape are atypical to the agricultural built form qualities that emphasise the largely rural character of the local landscape. Therefore, the proposal is considered inconsistent with the local landscape character.

## 1.4 SLVA Review Matrix

CRITERION	RESPONSE	COMMENT
<b>1 - Overall Approach</b>		
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).
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
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.
1.8 Does the assessment state whether the effects are beneficial or adverse?	Partially	Only for visual effects.
1.9 Does the assessment distinguish between the effects of construction and the completed development?	Partially	In details only for visual effects.
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.
1.11 Is there evidence of an iterative assessment-design process?	No	
<b>2 - Baseline, content and findings of the assessment</b>		
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.
- Photos?	Yes	
- Visualizations?	No	
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

CRITERION	RESPONSE	COMMENT
		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 <sup>6</sup> .
2.4 Is the value of landscape and visual resources appropriately addressed?	No	
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.
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	
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.
2.10 Has a ZTV/ZVI been produced?	No	
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	
<b>3 - Additional comments</b>		
3.1 The study area is not clearly defined for either the landscape or visual elements of the appraisal.		
3.2 In addition to point 2.3, there is no information on the printing size/scale of the visualisations in section 6.		
3.3 There is not a bibliography and documents mentioned in the LVA text have incomplete references (i.e. missing author and date).		
2.4 The planting mitigation plan (Section 8) is only specific to Lagoon North.		

<sup>6</sup> Visual Representation of Development Proposals, Technical Guidance Note 06/09, 16 September 2019

## 1.5 SLVA Commentary

- 1.5.1 The SLVA is not completely compliant with current guidance and practice. Although it references GLVIA3 and provides a detailed methodology, it appears to deviate from the standard guidance and blends the approach of a capacity study with that for landscape and visual assessment. Furthermore, the set methodology is not consistently applied throughout the SLVA; for example, the magnitude scale of the visual effects provided in table M7 of the SLVA Appendix is not reflected in the viewpoints analysis in Section 6 where a different scale is used.
- 1.5.2 The lack of a defined study area also appears to reduce substantially the scope of the assessment, resulting in a focus solely on local resources. It is also evident that the assessment of visual effects is dismissive of highly sensitive receptors. For example, the site visit identified that views of the development are available from the following public footpaths: Bressingham FP3, access to FP9, FP11 and FP7. These viewpoints/receptors are not considered in the SLVA.
- 1.5.3 Finally, the following considerations are made on the conclusion and findings of the SLVA:
- In landscape terms, it is agreed with the SLVA that the proposals will introduce man-made features that will have initial adverse effects as contrasting with the natural and organic qualities of the contextual rural landscape. However, it is not agreed that the proposed landscape strategy will mitigate the adverse effects associated with the West Lagoon. Conversely, the proposed planting will accentuate the introduction of a engineered landscape feature and, due to the lack of a detailed planting plan for this lagoon, it is believed that it will not link to existing vegetation, emphasising an isolated landscape feature within the open field.
  - In visual terms, it is agreed that the proposal would be recessive in the visual experience of the landscape due to its small vertical scale. It is possible that the North Lagoon will be easily integrated into the existing vegetation pattern when the proposed planting has matured. However, the same is not proven for the West Lagoon, due to the lack of detailed landscape plans in the existing context.

## 1.6 Conclusion

- 1.6.1 The review of the LVA and SLVA has noted several inconsistencies and shortcomings. As a result, there are concerns on the reliability of the assessment undertaken for the proposed development.
- 1.6.2 Based on the reviewed evidence and site visit, it is expected that the proposed development associated with the anaerobic digestors at Deal Farm will result in some adverse landscape and visual effects that will not be fully mitigated by the proposed landscape strategy. Conversely, the proposed North Lagoon is likely to be well integrated into the landscape once proposed planting has established. However, it is likely that the West Lagoon would result in permanent adverse effects.
- 1.6.3 It is also noted that much of the proposed planting mitigation drawing 2021-413-005 appears outside of the planning application's red line boundary and no further information was provided on land ownership. Similarly, it is unclear if the proposed landscape scheme for the North Lagoon is included in the planning application site boundary. The ability to implement and maintain the proposed planting is critical to the mitigation strategy; based on the submitted plans there are concerns over the possibility of ensuring the delivery of the planting scheme through a planning condition.
- 1.6.4 In conclusion, 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.

**Martina Sechi BSc BE, MALA, CMLI**

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