

Maureen Darrie
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via email

31st January 2017

Dear Maureen,

PROPOSED WOOD YARD EXTENSION TO PEBBLE HALL RENEWABLE ENERGY GENERATION FACILITY – AMENDMENTS TO SCHEME

Further to your recent correspondence and issue of the amended proposals to the above scheme dated 23rd January 2017 and set out on drawing GPP/WWM/PHWY/16/04_Rev no. 14, I'm writing to set out my analysis of how these amendments may affect the conclusions in the Landscape and Visual Impact Assessment prepared in April last year. This analysis effectively supersedes the remarks made in the Addendum to that assessment dated October 2016 which related to a previous scheme amendment now no longer applicable. However, the methodology applied to that addendum is that employed to arrive at the conclusions set out in this letter.

Amendments

The substantive changes to the Proposals affecting landscape character and views are as follows:

- The original twelve groups of four storage bays together with two pairs and one isolated bay have been reduced to three larger groups each equivalent to three of the groups as initially proposed arranged in columns two-by-six bays, plus a row of six individual bays. The three columns are oriented in a broadly north-south arrangement in the northern portion of the 'main site' (as previously described), with the single row oriented west-east in front of the existing REGF complex. These changes leave the southern portion of the 'main site' unoccupied by storage bays; however, the three main columns now require part of the field to the west to be incorporated into the main site. Further, the single row introduces the bays into a part of the site north of the REGF not previously included.
- In addition to the reduction in the number of bays, the height of the bays is now proposed to be 5m rather than the 6m originally proposed. In all other particulars, the proposed storage bays remain as in the original Proposals.
- In addition to the reduced area of the main site hosting wood waste, the piles themselves will be restricted to 4m in height rather than the 5m originally proposed. In all particulars the wood waste piles remain the same as for the original Proposals.
- The design particulars remain as in the original Proposals. However, these tanks are now proposed to be located further north within the main site, adjacent to the existing artificial slope east of the main site and separated from each other by the length of the storage bay columns, the northernmost being situated a little north of the main storage bay columns.
- The quarantine area is now proposed to be situated a little north of the main storage bay columns. In all details particulars this component remains as in the original Proposals.
- I understand that it is now proposed that concrete surfacing be painted in a green shade.

- The area to the east of the main site now excluded from the array of storage bays would be unaffected by the amended Proposals. The spur of landform originally proposed to extend southwards from the existing artificial mound east of the main site would therefore no longer be constructed. Further, it is understood that due to the smaller site area affected by construction, there would be less material available to create screening landform to the west of the main site than originally proposed. Hence, it is no longer proposed to reprofile the field to the west of the main site.

These amendments result in the following features being lost or retained:

- The area of existing ground surface to be altered would be reduced by the amendments to the area around the reduced array of storage bays.
- A short length of hedgerow formerly forming part of the western boundary of the main site would be lost.
- A short length of drainage ditch formerly running along the western boundary of the main site would be lost.

The construction programme is largely unaffected by the amendments to the Proposals. A smaller scheme however offers the opportunity to reduce the construction programme by a modest amount. No aspects of the operation of the scheme would change as a result of the amendments.

Changes to mitigation

The proposed mitigation measures would be affected as follows:

- There would be a slight increase in the total area planted with woodland, including a belt approximately 20m wide along the new southern edge of the proposed wood storage area replacing the belt formerly proposed to run along the eastern boundary of the main site.

No additional mitigation is proposed.

Changes to the landscape assessment

The result of the amendments to the proposals in relation to each of the residual effects upon landscape identified by the original LVIA are as follows:

1. There would be fewer changes to landform due to the omission of the spur originally proposed to extend from the existing REGF bund and the reduction in the quantity of material re-spread in the field to the west. However, I do not consider the amendments substantively alters the significance of residual effects upon landform, which remain minor adverse during construction and upon opening, reducing to neutral in the medium and long term.
2. The loss of hedgerow is of minor adverse significance but is adequately balanced by the proposals to refurbish other existing sections of hedgerow. I do not consider this substantively alters the significance of the residual effect upon the hedgerow resource.
3. The slight increase in proposed mitigation planting is welcome but would not substantively alter the significance of residual effects upon tree cover.
4. The slightly smaller quantity of concrete and waste wood stacks would not substantively alter the significance of residual effects upon the balance of materials in the landscape.

In addition, attributes of character not previously considered to be significantly affected but now impacted to a different extent by the amended proposals include arable vegetation, landscape pattern and one watercourse. In the case of arable vegetation, a smaller area would be lost than with the original Proposals; conversely the reduction in site area produces an anomalous 'left over' enclosure of smaller scale than, hence disturbing, the

prevailing field pattern. Both of these effects are however localised and of very minor if not negligible significance; one positive the other arguably negative. The loss of a short section of field drain is also of negligible significance in relation to landscape character.

Given both the relatively small scale of the original Proposals and the modest scope of the amendments, the changes to the previously identified significant residual effects on landscape character are not likely to be noticeable. Hence, my assessment of the residual effects remains as in the original LVIA: i.e. that the effects are of *minor adverse* significance during construction until opening, reducing to *neutral* in the medium term and *minor beneficial* upon maturity of the mitigation planting proposed.

Changes to the visual assessment

The most significant visual effects identified in the original LVIA were upon viewers from upper storey windows at Bosworth Hall and using the Public Bridleway A2 running south of Husbands Bosworth. The reconfiguration of the Proposals on the main site has two contradictory effects upon these views. Firstly, by reducing the extent of the Proposals visible from these locations it reduces their significance. Conversely, the reduction in the height of any landform intended to aid screening of the Proposals in views from the west lengthens the time before which the proposed mitigation planting would become a fully effective. In the case of Bosworth Hall, however, the part of the original Proposals most visible was to have been the south-westernmost corner of the main site. Hence, the balance of gain and loss is beneficial in respect of views from this location. With regard to views from A2, distance limits the significance both of the original effects and of the reduced effectiveness of screening in the short term. Overall, therefore, I conclude that the reconfigured layout represents a net reduction in the significance of residual effects on views to the west.

With regard to views from the east, it is necessary to differentiate between those views experienced from the south side of the REGF – i.e. Public Bridleway DN1, roads and private property near to Hothorpe Road – and those to the north at Theddingworth. From the south, the reduced footprint of the proposed wood storage area either removes the facility completely from view or further distances the visible structures on site from the viewer. The resulting glimpses available during construction and in the early days of operation must now be sufficiently restricted to be considered of no substantive importance in these views. I therefore conclude that the residual impacts on viewers in these locations are negligible or neutral in significance. Views to the east situated north of the Pebble Hall complex would now be affected in a different manner, however. The introduction of the single row of storage bays north of the existing REGF would very marginally increase the visibility of the Proposals to a handful of viewers in properties at the western edge of Theddingworth. However, the new structures would be closely associated with the existing industrial buildings in the Pebble Hall complex and would not be out of keeping with them. Further, The effect is also at least partly offset by the reduction in height of the bays from 6m to 5m. Finally, both existing and proposed mitigation planting along the site haulage track would as rapidly screen these features as with the original Proposals. I therefore conclude that the changes do not substantively alter residual visual impacts upon these views.

Similarly, the placement of wood storage bays north of the REGF would increase the visibility of the Proposals from upper storey windows at Woodside Farm. Once again, however, they would be closely associated with the existing industrial buildings of the complex already visible from this location, and would be absorbed in the view as rapidly as with the original Proposals by the mitigation planting both existing and proposed. The effect is also at least partly offset by the reduction in height of the bays from 6m to 5m. At worst, then, this represents a minor worsening of the visual impact of the Proposals during construction and upon completion.

Overall, I consider that visual impacts remain for the most part *minor adverse* significance but with a single instance of slightly increased significance, and in any case of no greater than *moderate adverse* significance as with the original Proposals. Further, the benefits associated with the proposed mitigation planting in relation to the absorption of the Pebble Hall complex as a whole in views from the west, south-east and north still apply. Hence, in the long term, the significance of visual effects would be *minor beneficial* as with the original Proposals.

Changes to the cumulative assessment

Having reviewed both the cumulative assessment in the original LVIA my conclusions are similar to those in the addendum of October last year: i.e. that whilst the Proposals contribute marginally to the overall impacts upon landscape character and views resulting from similar development in the area, the great bulk of impacts are due to pre-existing development and that the overall effect of the Proposals is to *reduce* the significance of cumulative impacts when mitigation is taken into account.

Accordingly, the cumulative effects upon both landscape character and views of the three developments considered together in the original cumulative assessment continue to be considered of *moderate adverse* significance, with a positive contribution made by the Proposals to reducing cumulative effects.

Conclusion and recommendations

No substantive adjustment to the significance of effects upon landscape character or views are considered to result from the amendments to the Proposals. However, the reduction in land take by features likely to be considered negative in character such as storage bays, concrete surfacing and artificial landform must be considered positive in principle. Further, the increased distance of the Proposals to some viewing locations is likely to marginally reduce any perceived negative effects of visual receptors in these locations.

The mitigation proposed remains effective in offsetting some of the impacts on landscape character and reducing visual impacts. The recommendations in the LVIA concerning the type and species of planting and the adoption of minimum standards of soil handling and storage continue to stand.

The proposal to paint the concrete surfaces green requires careful consideration. Green-coloured structures do not integrate well visually in settings where vegetation is a dominant feature, since uniform masses of a single green tone tend to clash uncomfortably with the multiple textured green surfaces in the environment, paradoxically drawing attention to the artificiality of the structures concerned. The effect is particularly jarring in the winter months, when natural greens are more muted if not absent. For larger structures, browns and greys are effective, although some greens of very neutral tone and sufficiently different from the greens of the surrounding vegetation to provide a comfortable contrast may be appropriate. As a rule, however, colouring a large area of concrete green is likely to increase, rather than decrease its visual impact. I therefore do not recommend that this form part of the mitigation strategy under any circumstances.

Yours sincerely,



Simon Watkins CMLI

cc. Roger Clarke, Welland Waste Management Ltd.