

Appendix A - To supplement the Wiltshire Council's Landscape Officers (interim) consultation response for **PL/2023/03359** – New anaerobic digestion facility - Land West of Ashton Road, Ashton Keynes, Wiltshire, SN6 6QT.

Background

This document comprises a review of the Landscape and Visual Impact Assessment (LVIA) submitted to accompany a planning application for a development proposal which seeks full planning consent for the construction, operation and decommissioning of a new anaerobic digestion facility, ancillary infrastructure and construction of new access from Ashton Road at a site located on land West of Ashton Road, Ashton Keynes, Wiltshire, SN6 6QT.

This is the third iteration of a LVIA that has been submitted to accompany this application, by two different landscape consultants. The current LVIA iteration has been prepared by Pegasus Planning and is included as Chapter 7 of the submitted revised Environmental Statement and supplemented by ES addendum (2025). It is accompanied and illustrated by various tables, figures and appendices, including baseline photography and visualisations (photomontages) and further supplemented by an additional viewpoint 10 and revised landscape strategy included within ES, Addendum Rev 03, dated 17 Oct 2025.

This LVIA review has been carried out by Mark Goodwin CMLI, Senior Landscape Officer, Wiltshire Council. It follows on from a number of previous landscape consultation responses already provided for this application.

The development proposal has iteratively changed over the course of the application. The purpose of this review is to inform the LPA, as to whether the current submitted LVIA is sufficiently robust as to provide a proportionate, systematic, unbiased and transparent assessment of the resulting landscape and visual effects considered likely to arise from the scale and nature of the development being proposed at this site and introduced into this receiving landscape context.

This review has been undertaken with regard to current best practice and guidance included within the following list of publications.

- GLVIA3 - Guidelines for landscape and visual Impact Assessment – Third Edition (Landscape institute & Institute of Environmental Management and Assessment).
- TGN 1/24 - Technical Guidance Note 2024-01- Notes and Clarifications on GLVIA3. (Landscape Institute).
- TGN 1/20 - Technical Guidance Note 1/20 – Reviewing LVIA's and LVAs. (Landscape Institute).
- TGN 02/21 – Technical Guidance Note 02/21 – Assessing landscape value outside national designations. (Landscape Institute).

Comments/Observations

LVIA Methodology

The detailed methodology for the LVIA undertaken is included at ES, Chapter 7, Appendix 7.1.

The Study Area has been set at a 2 km radius from the site area. I do not raise a concern with this, as neither the visibility of the site, or the height of the development proposal (as amended) is likely to result in much potential for significant effects beyond this distance. The 2km study area is considered proportionate to the task at hand and has been informed by a 'Screened Zone of Theoretical Visibility Map' (SZTV) included as Figure 7.2.

Landscape Value

The LVIA methodology includes criteria to inform judgements of value for landscape elements/components and landscape character, which is included at Table 2, and uses a high/medium/low scale within the assessment.

In my opinion the assessment doesn't properly analyse the value of the landscape at a site or local level or recognise the local value of the hill feature as a notable landscape component in its own right or recognise this to represent a rare opportunity to experience wide elevated middle and longer distance views over and across the landscape in a unique and dynamic landscape of the Cotswold Water Park (CWP) which is being steered towards nature conservation and leisure and informal recreation uses, following gradual cessation of minerals extraction.

GLVIA3¹ guidelines in relation to considering local value at Box 5.1, clearly identifies that landscape quality (condition), scenic quality, rarity, representativeness, conservation interests (wildlife, archaeological, historical and cultural interest, add value to the landscape as well as having value in their own right), recreation value, perceptual aspects and associations are all factors that can help in the identification of valued landscapes.

The assessment seems to distance itself from the unique nature of the CWP landscape, the various indicators of value mentioned in previous landscape consultation responses are not referenced as collectively contributing to increased local value. The LVIA simply defers matters of heritage or ecological value to the separate supporting assessments without further consideration of how such components can individually or collectively add value to the landscape as a resource. The landscape value of the site and its context cannot be evaluated in isolation or by an arbitrary 250 metre concentric circle drawn around it.

National designations and local designations are indicators of increased value. While the site doesn't fall within a recognised national landscape designation or a Special Landscape Area, the site does lie within the designated boundary of the CWP which has its own guiding Development Plan Policy (Wiltshire Core Strategy, CP54: Cotswold Water Park) and 'Landscape Character Assessment' and 'Vision and Implementation Plan'. The CWP is a dynamic landscape gaining increasing national interest for its important large number of SSSI Marl lakes, and its nature conservation, green infrastructure, recreation and leisure function/value. In my opinion the LVIA is limited in its consideration of local value, simply noting the site isn't visible from lakes and doesn't encroach into SSSI lake areas, so the site and its context are in effect nothing more than normal countryside influenced by operational quarries and the aggregate industries site (located to the southeast of the site). The LVIA commentary also refers to the proposed

¹ Guidelines for Landscape and Visual Impact Assessment – Third Edition (landscape Institute & Institute of Environment

development being introduced into a ‘modern agricultural landscape’ without any local rationale, which could be interpreted as lower value countryside without further justification. Ashton Down and other surviving greenfield areas of countryside left physically untouched by active or historic minerals working sites and which separate and surround the numerous lower-level lakes and visitor attractions and settlements within the western portion of the Cotswold Water Park in Wiltshire should be recognised and valued within the LVIA’s considered judgements. The value of elevated panoramic/wide views over the Cotswolds Water Park available from public footpath AKEY4 traveling up and down and along the central ridge of Ashton Down to a highpoint destination close to the northwest corner of the site are judged within the LVIA to be of the same receptor value as the lower-level transient views gained by car users travelling along Ashdown Road. While views towards rising Downland is recognised as a significant feature of the landscape in character assessments, elevated views are a rarity from within the CWP. This in my opinion illustrates the lack of sufficiently detailed considerations informing judgements of receptor value at the local level and clearly illustrates that the assessment methodology is relatively coarse and high level as it is unable to differentiate with the current criteria used within the assessment (Table2) to inform judgements of value within the landscape assessment.

Landscape Sensitivity

The LVIA methodology combines judgements of receptor value with the susceptibility (to the scale and nature of change proposed) of landscape receptors included for assessment to give an **overall sensitivity** score, included at Table 1, and uses high/medium /low scale within the assessment.

Landscape Susceptibility

The LVIA methodology includes criteria to inform judgements of landscape susceptibility, included as Table 3, and uses high/medium /low scale within the assessment.

LVIA, Para’s 7.3.41 to 7.3.45 evaluates susceptibility of the landscape to the scale and nature of development being proposed.

The LVIA’s considerations of susceptibility doesn’t appropriately consider the existing site topography within its rationale informing judgements on sensitivity (nature of receptor) to change arising from the development proposal, or how development of this scale and nature typically requires large footprint areas for its storage clamps, digester tanks, covered lagoons, storage sheds & associated level areas for vehicle loading/unloading and manoeuvring, or how these requirements are not well suited to the site’s existing topography, which generally slopes down in height circa. 10m (west to east) across the site. The existing site topography requires significant changes in level to accommodate the large, flat development slabs required. This is considered particularly invasive, and not particularly sustainable, given the amount of earthwork movement and concrete being proposed, especially for a temporary permission of 25 years.

An alternative level site area would not require this same high level of change to topography and landform in order to create level development slab footprint areas to accommodate the larger footprint development components.

The LVIA asserts at “7.3.45 Since Anaerobic Digestion facilities are characterised by their medium scale footprints, and elements not dissimilar to large agricultural buildings, the susceptibility of the local landscape to **this type** of development is assessed as **medium**.”

The above assertion is too generic and gives little or no weight to baseline site characteristics i.e. undeveloped green field site location on the side of a noteworthy elevated local topographical hill feature (Ashton Down), close to a public road (east) and public footpath (west). The assessor views the proposed development to be similar in characteristics to large scale agricultural building/s (which I do not agree with), located on agricultural land and therefore concludes it would be appropriate and characteristic fit with countryside i.e. a good fit with the site and with the local landscape character. The assessor doesn't appear to consider that the site characteristics are not well suited for the insertion of a 7-hectare new build farmstead complex at this hillside location, and which for similar reasons is not well suited for development of a new 7-hectare AD facility.

In my opinion the LVIA is too broadbrush on matters of susceptibility informing its judgements on the sensitivity of the site and its context for the insertion of new development of this scale and nature.

I could agree that susceptibility of the landscape to a new Anaerobic Digestion Facility, might be considered **medium** if the site wasn't located on the side of an undeveloped shallow local hill feature (Ashton Down) occupying a local high point in the landscape, and/or if it was associated with an existing redundant or operational agricultural farmstead complex, which it isn't. I don't agree that anaerobic digestion facilities (ADF) are necessarily characterised by **medium** scale footprints, as ADF's can be constructed at differing scales (in a similar way to housing or Solar PV schemes).

I do not agree that a 7-hectare greenfield development site, which impacts two separate field units represents a medium scale build footprint on this local hillside and hill feature. The proposed 2 x no. 45metre diameter x 9-10m high primary digester tanks, 33metre diameter x 16.5m high fermenter tank, 2 x no. covered digestate lagoons, or the circa 4.5m high continuous concrete containment walls surrounding the elevated concrete development slabs running along approx. half the application site's eastern boundary facing Ashdown Road are representative of agricultural farmsteads within the CWP, or representative of wider agrarian character within the study area.

The LVIA considers that the excavation of development slabs into the east facing slopes of Ashton Down to be embedded mitigation, however, the LVIA doesn't mention that development slab levels along the lower eastern side of the site will be elevated by up to 3 metres (worst case) above existing adjacent Ashdown Road levels (at the southeastern corner of the site) which could not be considered to be embedded mitigation (it would be the opposite). The sloping nature of the site dictates that cut and fill is necessary to achieve large level build areas.

References within the LVIA to nearby minerals working / restoration sites and the Aggregate Industries processing plant to the southeast of the site as evidence that the proposed AD development can be reasonably well assimilated into the lower flat landscape are not particularly relevant when seeking to draw comparisons with the landscape and visual effects

likely to arise from this proposed AD facility, being proposed on the rising greenfield slope of a local Hillock and notable landscape feature. In my opinion the judgement of susceptibility, feeding into Sensitivity scores for landscape assessment should be higher to reflect the scale and nature of the development being proposed on this elevated sloping site. I consider that susceptibility to the scale and nature of development being proposed at this site is **High**. contributing factors informing my judgement of higher susceptibility is the fact that development requires the removal of an existing field hedgerow and alteration of the existing field pattern, creates a small new field in the northwest corner of the site for reasons not apparent, introduces angular earth bunds along the sites southern and western boundaries close to the rolling ridge of Ashton Down, and running down the hillock's east facing slope. The site is then proposed to be surrounded by new woodland planting and high hedgerows to screen the development. The LVIA considers the mitigating planting to be consistent with the "Pattern and species composition of local planting" which is not correct. The landscape importance of the site is that it comprises an integral part of an undeveloped rolling Hillock landscape feature, with rising fields, delineated by a mix of low and high native hedgerows. The character and sense of place of this Hillock (Ashton Down) will be adversely and significantly impacted by the proposed development; Longer range open public views from within the water park are rare, typically screened or obscured at lower floodplain level by maturing unmanaged regenerating woodland growing around and separating the lakes. The proposed bunding and woodland planting will lead to permanent loss of currently open longer views to the east and southeast from a section of public footpath AKEY4 running parallel to the western edge of the application site.

Magnitude of Change

The LVIA methodology includes criteria to inform judgements on the magnitude of change for **landscape elements** at Table 5, and for **landscape character** at Table 6, ES, Appendix 7.1, and uses high/medium/low/negligible scale within the assessment.

Criteria used to inform judgements on the magnitude of change for **visual receptors** are included at Table 10 and uses a high/medium/low/negligible scale within the assessment.

Assessed Development Phases

The LVIA has assessed the identified **landscape** receptors at Construction, Operation (year 1) & Operation (year 15) and at Decommissioning development phases (ES, Appendix 7.4).

The LVIA has assessed the identified **visual** receptors at Construction, Operation (year 1) & Operation (year 15) development phases. It does not include assessment of visual effects at the Decommissioning phase (ES, Appendix 7.5). There is no explanation as to why development phases assessed are not consistently applied for the separate assessments of landscape and visual receptors.

Given the development proposal has a defined 25-year lifespan and infers that landscape restoration will follow the planned decommissioning of the development proposal, the assessment could have assessed the change effects at the planned **Restoration** phase, in order to better understand the projects full temporal effects and reversibility, and importantly the

landscape and visual legacy of the project measured against the current landscape and visual baseline scenario's.

It could be that the assessor has not been able to assess the restoration phase, as the intention of restoration proposals, are not clearly presented within the application in my opinion. The LVIA has factored in that the built elements of the project would be removed from the site, and hints that the mitigation woodland planting on the bunded mounds would likely remain to the west and south. However, the assessment is silent on the matter of actual land and landform restoration back to original field and Hillock levels, i.e. removing build slabs, reinstating the topographical baseline levels of Ashton Down's eastern slopes back to productive farmland and restoring the integrity of the local hill feature. I raise serious concern with the feasibility and intent of land restoration proposals, following the decommissioning phase of this AD project.

The application proposals do not identify any soil stockpiling storage areas, either on, or off site. This leads me to conclude that it would be necessary for huge amounts of soils to be acquired and imported back into the site following decommissioning to reinstate the land back to topographical baseline levels. **To ensure the planning certainty of land restoration after the projects 25-year operational life span, the LPA should seek further clarity and certainty on this specific matter from the applicant. If the LPA is minded to support the application on planning balance, then I would consider and recommend that a specific requirement for a planning condition or unilateral undertaking via a Section 106 legal agreement to require land restoration back to baseline (before development) topographical levels would be necessary for reasons of planning certainty.**

Landscape and visual effects

Landscape Considerations

The Landscape Assessment includes an assessment of the following landscape components and landscape character receptors.

- Trees and hedgerows.
- Crops/grassland.
- Topography.
- The Site within the Landscape Character Area- 3A South Cerney and Ashton Keynes Settled Wetlands².
- The immediate context³ of the site within Landscape Character Area- 3A South Cerney and Ashton Keynes Settled Wetlands.
- The wider Landscape Character Area- 3A South Cerney and Ashton Keynes Settled Wetlands.

The results of the landscape assessment are presented in a Table, ES Chapter 7, Appendix 7.4: Landscape Receptor Assessment.

² Cotswolds Water Park Integrated Landscape Character Assessment –LDA Design, 2009.

³ Within 250 meters of the site boundary.

Detailed comments in relation to evaluation of the LVIA's findings are inserted as *red italic type*. Differences in professional judgement between the Council's landscape Officer and the applicants appointed landscape consultant are included in **(bold)** with corresponding LVIA assessment judgements and effects retained as strike through text (to allow direct comparison). The review of judgements on sensitivity and magnitude of change and nature and significance of effects is based on the criteria and scales used within the LVIA. The justification and rationale for differences are supported by earlier comments on receptor value, susceptibility, sensitivity and magnitude of change included earlier within this appendix and further supplemented by additional rationale commentary included as *red type* under each landscape receptor reviewed, as appropriate.

Landscape components

1. Trees and Hedgerows (ES, Appendix 7.4)

Sensitivity Trees -**Medium** / Hedgerows – **Low**

Magnitude of effect

Trees- **Negligible** (Construction and Operation Year 1) **Low** (Operation Year 15 & Decommissioning).

Hedgerows- **Low Moderate** (Construction and Operation Year 1). **Negligible (Low)** (Operation Year 15) and Decommissioning).

Nature and Significance of effects

- Construction – Hedgerows **Minor (Moderate) Adverse** (not significant) / Trees **Negligible Adverse** (not significant).
- Operation (Year 1 following construction) - Hedgerows **Minor Adverse** (not significant) / Trees **Negligible** (not significant).
- Operation (Year 15 following construction) – Hedgerows **Negligible** (not significant) / Trees – **Moderate beneficial** (not significant).
- Decommissioning – Hedgerows **Negligible** (not significant) / Trees – **Moderate Beneficial** (not significant).

2. Crops and grassland (ES, Appendix 7.4)

Sensitivity – **Low (Medium)**

Magnitude of effect – **Medium** (Construction) **Low** (Operation Year 1, Operation Year 15 & Decommissioning).

Nature and Significance of effects

- Construction –**Minor (Moderate) Adverse** (not significant).
- Operation (Year 1 following construction) - **Minor Beneficial (Moderate Adverse)** (not significant).
- Operation (Year 15 following construction) –**Minor Beneficial (Moderate Adverse)** (not significant).

- Decommissioning – ~~Minor-Beneficial~~ **(Neutral)** (not significant).
The planned removal and replacement of 7 hectares of agricultural fields on this low rolling hillock and landscape feature, and its replacement with hard surfacing and various structures, seems to have been overlooked within the LVIA, seemingly only factoring field margin grassland enhancement and retained woodland screen planting. The assessment scores for this receptor are not credible in my opinion.

3. Topography

Sensitivity – **Medium (High)**

Magnitude of effect – **High** (Construction) **Medium** (Operation Year 1, Operation Year 15 & Decommissioning).

Nature and Significance of effects

- Construction – ~~Major Adverse~~ (not significant) **(Significant)**.
Even without the adjusted sensitivity judgement, the nature and significance of effect would be major adverse and significant.
- Operation (Year 1 following construction) – ~~Moderate Adverse~~ (not significant) **(Major Adverse)** **(Significant)**.
- Operation (Year 15 following construction) – ~~Moderate Adverse~~ (not significant). **(Major Adverse)** **(Significant)**.
- Decommissioning – ~~Moderate Adverse~~ (not significant). **(Major Adverse)** **(significant)**.
As discussed earlier under comments on landscape value and susceptibility combining to inform judgements on overall receptor sensitivity increases the adverse nature of the assessed effects included within the LVIA.
*Following full restoration of baseline topography back to original field levels, the nature and significance of effect for this receptor could change to a **Minor adverse** or a **Neutral** effect, but this would be dependent on conditioning full agricultural land restoration.*

Landscape Character

4. The Site within Landscape character Area 3A – South Cerney and Ashton Keynes Settled Wetlands⁴.

Sensitivity – Medium

Magnitude of effect – High (Construction), Operation Year 1, Operation Year 15 & Decommissioning).

Nature and Significance of effects

- Construction – **Major Adverse** (significant)
- Operation (Year 1 following construction) – **Major Adverse** (significant).
- Operation (Year 15 following construction) – **Major Adverse** (significant).
- Decommissioning – ~~Moderate~~ **Major Adverse** (not significant) **(significant)**.

⁴ Cotswold Water Park Integrated Landscape Character Assessment (2009)

The nature and significance of effects at decommissioning are likely to be the same or similar to assessed effects at construction. There will be noise generated by breaking up large areas of concrete slabs and the retaining / containment walls running parallel with Ashdown Road, and significant earthworks and vehicle movements to remove waste materials and import soils associated with reinstatement of land and topography.

5. The immediate context (250 metres) of the Site within Landscape character Area 3A – South Cerney and Ashton Keynes Settled Wetlands.

Sensitivity – Medium

Magnitude of effect – **High** (Construction), **Medium High** (Operation Year 1), **Low (Medium)** (Operation Year 15) **Low High** (Decommissioning).

Nature and Significance of effects

- Construction – **Major Adverse** (significant)
- Operation (Year 1 following construction) – ~~**Moderate Adverse**~~ (not significant). **(Major Adverse (Significant))**
- Operation (Year 15 following construction) – ~~**Minor (Moderate) Adverse**~~ (not significant).
- Decommissioning – ~~**Minor Adverse**~~ (not significant). **(Major Adverse (Significant))**.

The nature and significance of effects at decommissioning are likely to be the same or similar to the effects assessed at construction. There will be noise generated by breaking up large concrete slab areas and the retaining / containment concrete walls running parallel with Ashdown Road, and significant earthworks and vehicle movements to remove waste materials, buildings and structures and the importation of soils associated with reinstatement of land and topography, and some permanent loss of views towards the hillock and views from it.

6. The wider LCA 3A; South Cerney and Ashton Keynes Settled Wetlands within the study Area beyond the site and its immediate context.

Sensitivity – Medium

Magnitude of effect – **Negligible (Medium)** (Construction and Operation (Year 1), **Negligible (Low)** (Operation (Year 15) & Decommissioning).

Nature and Significance of effects

- Construction – ~~**Negligible**~~ (not significant). **(Moderate Adverse (not significant))**.
- Operation (Year 1 following construction) – ~~**Negligible**~~ (not significant). **(Moderate Adverse (not significant))**.
- Operation (Year 15 following construction) – ~~**Negligible**~~ **(Low Adverse)** (not significant).
- Decommissioning – ~~**Negligible**~~ **(Low adverse)** (not significant).

The proposed development of a new 7-hectare AD facility on the side of a notable landscape Feature (Ashton Down) identified within the Landscape character Assessment, will result in the removal of gently sloping arable field areas at its central east facing slope and impact the rolling ridgeline, disrupting the integrity of existing baseline field patterns, land use and land cover. The

insertion of the large structures and buildings and mitigating woodland planting will screen and disrupt the understanding and appreciation of this local landscape feature (Ashton Down), valued for its elevated vantage points and rising undeveloped slopes. The new facility will be perceived as an obvious and uncharacteristic large addition and detracting feature introduced into this character area, which is not considered a good fit with baseline characteristics.

Visual Considerations

The most recently submitted LVIA for this project assesses the following change effect outcomes for the visual receptors included in the assessment (Tables 1, 2, 3, 4 & 5, Appendix 7.5: Visual Receptor Assessment, ES Chapter 7) which are included and summarised below. A Photo viewpoint location plan is included as Figure 7.8. Baseline photography and wire frame & photomontage visualisations for viewpoints 1-9 are included at Appendix 7.3. In addition, photography for an additional viewpoint (Viewpoint 10) is included within ES Addendum-Rev 03, Appendix C.

Landscape officer detailed comments in relation to evaluation of the LVIA's findings are inserted as *red italic type*. Differences in professional judgement between the Council's landscape Officer and the applicants appointed landscape consultant are included in **(bold)** with corresponding LVIA assessment judgements and effects retained as strike through text (to allow direct comparison). The review of judgements on sensitivity and magnitude of change and nature and significance of effects is based on the criteria and scales used within the LVIA. The justification and rationale for differences are supported by earlier comments on receptor value, susceptibility, sensitivity and magnitude of change included earlier within this appendix and further supplemented by additional rationale commentary included as *red type* under each visual receptor reviewed as appropriate.

1. Ashton Road - Road Users – (ES, Appendix 7.5, Table 1 & represented by photo viewpoints 1 & 2).

Value of views – **Medium**. Susceptibility -**Medium (High)**. Sensitivity -**Medium (High)**. Magnitude of Change -**High** (Construction & Operation Year 1) - **Medium (High)**. (Operation Year 15).

Nature and significance of effects

- Construction – Short term and temporary. **Major Adverse** (not Significant).
- Operation (Year 1 following construction) – Medium term and reversible. **Major Adverse (Significant)**.
- Operation (Year 15 following construction) – Long term and reversible. **Moderate** (not significant) **(Major Adverse (significant))**. *Noting that the nature of effect is absent from the LVIA's assessment table assumed, to be Moderate **Adverse**.*

2. Public Footpath AKEY4 - Footpath Users – (ES, Appendix 7.5, Table 2 & represented by photo viewpoints 3, 4, 5 and 7).

Value of views – **Medium**. Susceptibility - **High**. Sensitivity - **High**. Magnitude of Change - **High** (Construction) – **Medium (High)** (Operation Year 1) - **Low (Medium)** (Operation Year 15).

Nature and significance of effects

- Construction - Short term and temporary. **Major Adverse (Significant)**.
- Operation (Year 1 following construction) – Medium term and reversible. **Major Adverse (Significant)**.
- Operation (Year 15 following construction) – Long term and reversible. **Moderate neutral** (not significant). **(Long term and permanent. Major Adverse (Significant))**.

*The LVIA has already assessed that **Major Adverse Significant** effects will arise during the Construction phase and for Operation (Year 1). The residual visual effect at Operation (Year 15) is assessed as '**Moderate Neutral**' within the LVIA which is not accepted for the following reasons.*

*The LVIA author's judgements that have led to an assessed '**moderate neutral**' visual effect at operation (year 15) do not in my view adequately consider the loss / obstruction of currently open, rare elevated panoramic mid-range and longer-range views over the open agricultural fields comprising the application site within the Cotswold Water Park. Baseline views from this viewpoint will be screened and lost to the east by woodland planting on uncharacteristic earth bunds. The elevated local hill feature (Ashton Down) offers a rare opportunity for the public to look out across the landscape in all directions from this undeveloped Hillock. In my opinion the value of views for this receptor is higher than the other visual receptors assessed within the LVIA (Which are all judged to be moderate), due to their elevated and expansive nature of views over the lower countryside and settlements, and a rare opportunity to gain appreciation and understanding of the landscape above the containing lower level lake side regenerating scrub and woodland within the Cotswolds Water Park.*

The assessment views the effects to be fully reversible, however the intention is to retain the woodland planting and the earth bunds at decommissioning phase, so the loss of the current open eastern view from the ridgeline along the western edge of the site would be a permanent effect, screened by the retained woodland screen planting on uncharacteristic soil bunds, perceptual aspects for users with the development in place will be significantly reduced.

3. Views from settlement at South Cerney – Residents, public users of open space – (ES, Appendix 7.5, Table 3 & represented by photo viewpoint 6).

Value of views – **Medium**. Susceptibility – **High**. Sensitivity – **High**. Magnitude of change - **Low** (Construction & Operation Year 1) **Negligible** (Operation Year 15).

Nature and significance of effects

- Construction – Short term and temporary. **Moderate Adverse** (not Significant).
- Operation (Year 1 following construction) – Medium term and reversible. **Moderate Adverse** (not Significant).

- Operation (Year 15 following construction) – Long term and reversible. **Negligible** (not significant). *Noting that the nature of effect is absent from assessment table, assumed to be Negligible Adverse (not significant).*

4. Views from Playing Fields, South Cerney – Users of Playing Fields – (ES, Appendix 7.5, Table 4 & represented by photo viewpoint 8).

Value of views – **Medium**. Susceptibility – **Medium**. Sensitivity – **Medium**. Magnitude of change – **Negligible** (Construction, Operation Year 1 & Operation Year 15).

Nature and significance of effects

- Construction – Short term and temporary. **Negligible** (not Significant).
- Operation (Year 1 following construction) – Medium term and reversible. **Negligible** (not Significant).
- Operation (Year 15 following construction) – Long term and reversible. **Negligible** (not significant). *Noting that the nature of effect is absent from assessment table, assumed to be Negligible Adverse at construction and operation years 1 & 15).*

5. Views from Public Footpath BSC3, northwest of South Cerney – Footpath Users – (ES, Appendix 7.5, Table 5 & represented by photo viewpoint 9).

Value of views – **Medium**. Susceptibility – **High**. Sensitivity – **High**. Magnitude of change – **Negligible** (Construction, Operation Year 1 & Operation Year 15).

Nature and significance of effects

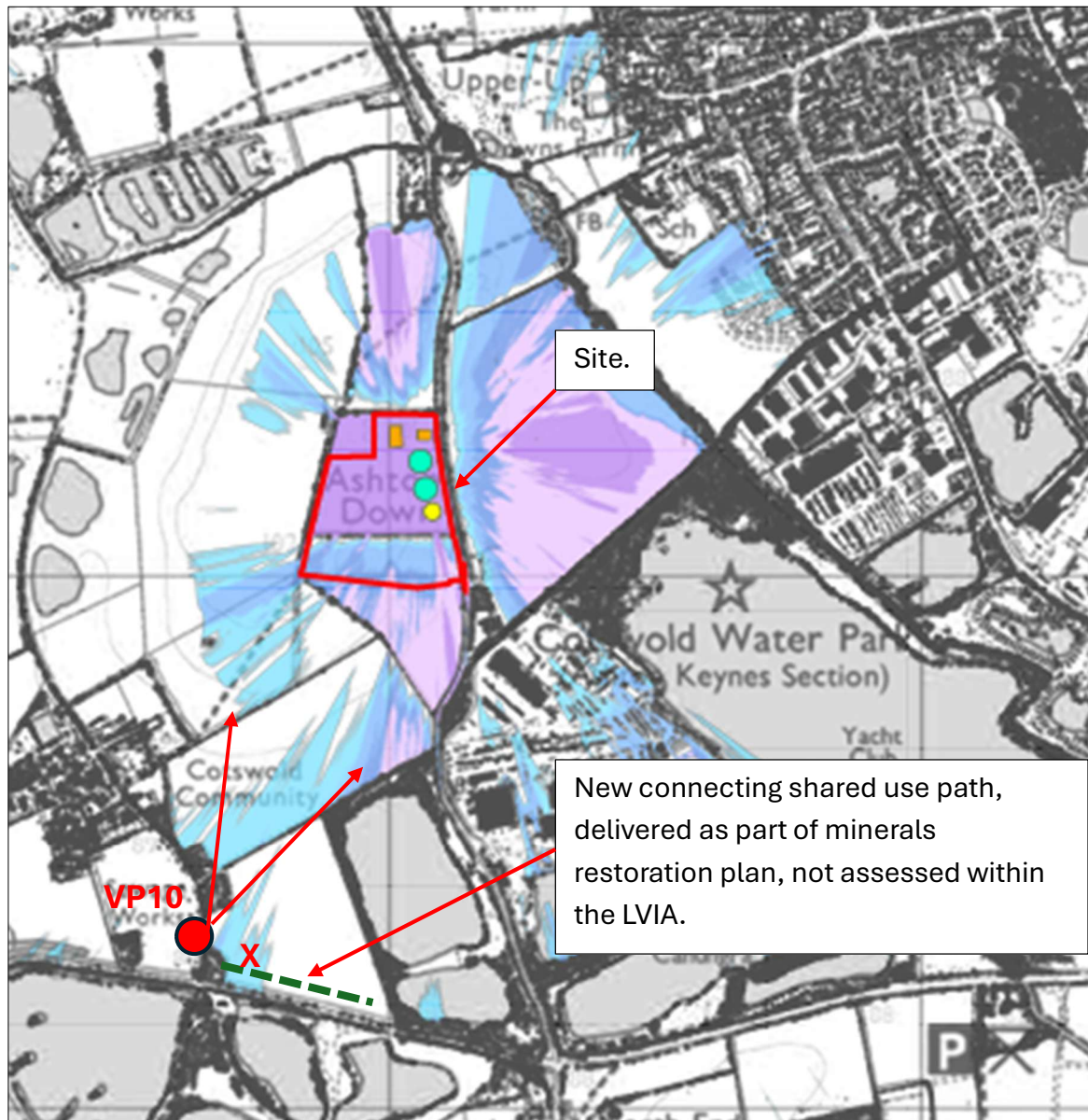
- Construction – Short term and temporary. **Negligible** (not Significant).
- Operation (Year 1 following construction) – Medium term and reversible. **Negligible** (not Significant).
- Operation (Year 15 following construction) – Long term and reversible. **Negligible** (not significant). *Noting that the nature of effect is absent from assessment table, assumed to be Negligible Adverse at construction and operation years 1 & 15).*

6. Additional Viewpoint – Views from Cotswold Community – Residents, public users of open space (ES Addendum-Rev 03, Appendix C, represented by Viewpoint 10).

A request was made during a site meeting with the applicants appointed landscape consultant for an additional viewpoint/s to be included from public open space within the new housing development at the Cotswold Community and from the new footpath linking east from the Cotswold Community running inside the roadside hedge with Spine Road West. The viewpoint 10 photography illustrates that the development is unlikely to be visible from within the Cotswold Community for users of new public open spaces within development, although private residential receptors from upper rooms in the eastern edge of the Cotswold Community are likely to view the top of the 16.5m high digester tank.

Requested views from the new public route close to the Cotswold community, where the Screened Zone of Theoretical Visibility Map indicates that there is potential for some shared

intervisibility from this receptor, with upper parts of taller development components. This receptor remains to be assessed (see extract below).



It is likely that the upper level of the taller 16.5m high digester tank will be visible to view from a short length along this public route at its western end, denoted with an 'X', especially during winter months. Viewpoint 10 is located slightly further west and further into the site viewed from a private access road within the Cotswold Community Development. However, I do not anticipate the visual effects would represent a Major Adverse significant effect for users of this route.

Additional comments

I find the LVIA's approach to identifying and assessing landscape character receptors unusual. It would be typical for the site to be assessed alongside and with its immediate and close adjoining landscape context, as in landscape character terms the development sites character is typically integrally influenced by its adjoining context. I don't understand the logic for the

inclusion of an arbitrary 250 metre donut drawn around the site perimeter as a specific landscape receptor for specific and separate assessment of landscape character.

Restoration

The application states on one hand the site and land will be restored back to full agricultural use after 25 years but makes no allowance for soil stockpiling within the site or any other identified location. It states that some of the stripped soil will be used to create the earth bunds (subsequently planted with trees).

It must therefore be assumed that the majority of surplus excavated soils will be treated as construction waste and lawfully disposed off-site. On this basis there will be a shortage of site soils to complete the restoration phase, requiring the importation of subsoils and topsoil.

Summary / conclusion

I concur with the LVIA's overall findings, in that the greatest resulting landscape and visual effects arising from the insertion of this industrialising development onto this local hill feature will be localised. However, the value and sensitivity of numerous receptors included within the assessment are not considered to be accurate to inform planning judgements and are not agreed.

I believe that there will be greater levels of harm and more significant adverse effects arising from the construction, operation and decommissioning phases of this development than the author of the LVIA concludes.

The site is not considered to be an appropriate or suitable location for a development of this industrialising nature and scale. Despite the applicant's efforts to improve the proposal through iterative design measures, and mitigating screen planting, the proposed development is still considered to result in unacceptable significant adverse localised landscape and visual harms, contrary to the requirements of WCS, Core Policy 51:Landscape.

Significant adverse localised landscape and visual harm should be factored into the LPA's wider planning considerations and balance in reaching its decision for this application.

End.

Comments by; Mark Goodwin CMLI, Senior Landscape Officer Wiltshire Council

Date 13/05/2026.