

Garlick's Arch

Regulation 25 and Clarifications Report

Prepared on behalf of

Guildford Borough Council



Project Number

J-GBC-136

Report No.

001

Revision No.	Date of Issue	Author	Reviewer	Approver
001 (Draft)	13/04/21	A. Kenny	P. George	T. Harding
002 (Final)	10/05/21	A. Kenny	P. George	T. Harding
003 (Revised)	13/05/21	A. Kenny	P. George	T. Harding
004 (Further Revisions)	21/05/21	A. Kenny	P. George	T. Harding

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1 Introduction

1.1 Background

- 1.1.1 Thomson has been commissioned by Guildford Borough Council (GBC) to review the Supplementary Environmental Statement (ES) submitted in support of proposed development at Garlick's Arch.
- 1.1.2 The original ES, dated December 2019, was submitted for London Strategic Land (hereafter 'LSL') on behalf of Garlick's Arch Limited (hereafter 'the Applicant'). The ES was submitted in support of the planning application for a development (hereafter 'the Proposed Development') on the land at Garlick's Arch, Send Marsh (hereafter 'the Site'). The planning application was validated on January 20th 2020 and assigned a reference of 19/P/02223 by the consenting authority Guildford Borough Council (hereafter 'GBC').
- 1.1.3 The ES was reviewed by Nicholas Pearson Associates, in January 2020, resulting in several requests for further information being made under Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (hereafter 'the EIA Regulations'). As a result, the Applicant prepared and submitted a Supplementary ES, and associated addenda, in February 2021. However, in the intervening period the Applicant also updated the design of the Proposed Development. As a result this review report assesses, sequentially, the Applicant's response to the requests for further information and whether the information now provided by the Applicant is sufficient to capture and assess potential significant effects arising as a result of the changes to the Proposed Development.
- 1.1.4 The Applicant originally proposed to develop the Site to provide:
'hybrid (part full/part outline) application comprising: Full planning permission for 220 residential dwellings (Use Class C3) with associated open space and landscaping, means of access, parking, drainage, utilities and infrastructure works, temporary acoustic fencing and other associated works; and Outline planning permission, with all matters reserved except for access, for up to 300 residential dwellings (Use Class C3) and Travelling Showpeople plots (Sui Generis) with associated open space and landscaping (including a landscape bund and acoustic fencing), means of access, enabling and landscaping (including a landscape bund and acoustic fencing), means of access, enabling infrastructure and other associated works.'
- 1.1.5 It was under this description of the Proposed Development that Nicholas Pearson Associates undertook their review of the Applicant's ES.
- 1.1.6 The Proposed Development, as described above, falls under Schedule 2, 10(b) ii & iii of the EIA Regulations – Infrastructure Projects, Urban Developments – as it comprises a development which includes more than 150 dwellings and the overall area of the development exceeds 5 hectares.

2 Regulation 25 Submission

2.1 Introduction

- 2.1.1 An ES is intended to provide an important part of the ‘environmental information’ that a planning authority must consider in accordance with the EIA Regulations, along with any representations from consultation bodies and the public on the ES. The information that an ES is required to include is set-out in Regulation 18 of the EIA Regulations. Regulation 18 refers to the need to provide any additional information specified in Schedule 4 relevant to the specific characteristics of the specific development, or type of development, and to the environmental features likely to be significantly affected.
- 2.1.2 Regulation 25 of the EIA Regulations allows a local planning authority, when dealing with a planning application which is supported by an ES, to request “further information” if the local planning authority is of the opinion that supplementary additional information is required to allow them to reach a reasoned conclusion on the likely significant effects of the development proposed. The local planning authority must notify the applicant in writing, and the applicant must provide that additional information for further consultation. Such information should only be requested where it is material to the understanding of the nature and significance of environmental effects, and not simply ‘nice to have’ additional information.
- 2.1.3 Regulation 25 can also be used by developers to submit further environmental information in support of a planning application where, for example, changes have been made to the design and layout of a proposed development, such that one or more of the topic assessments within the EIA (and reported in the ES) may require updating.
- 2.1.4 In the case of the Garlick’s Arch scheme, two key factors resulted in the further information submission. Firstly, the original ES had been subject to an independent review by Nicholas Pearson Associates (dated 11th March 2020), which identified a number of issues requiring supplementary information to be provided. Secondly, subsequent changes made to the design of the development required updates to be made to the assessments within the ES.

2.2 This Report

- 2.2.1 This report has two objectives; firstly, to review the Applicant’s response to GBC’s Regulation 25 request for further information and secondly, to review the assessment of the changes in Proposed Development against current information.
- 2.2.2 The review of the Applicant’s response to the Regulation 25 request draws on the initial ES review undertaken by Nicholas Pearson Associates as well as the additional information submitted by the Applicant. This is described in Section 3 of this report.
- 2.2.3 The review of the changes to the Proposed Development against currently provided information will draw on the Applicant’s Supplementary ES and the Applicant’s original, 2019 ES as appropriate. This is discussed in Section 4 of this report.

3 Summary of Outstanding Information

3.1 Introduction

- 3.1.1 This section of the report considers whether the comments raised by Nicholas Pearson Associates, in their review of the Applicant's 2019 ES, have been adequately addressed.
- 3.1.2 Clarifications and further information requests identified by Nicholas Pearson Associates primarily relate to:
- The description of the Proposed Development
 - Elements of the technical assessments
 - Provision of updated figures and maps; and,
 - The contents of the Non-Technical Summary
- 3.1.3 Table 3.1 below provides a summary of requested further information and clarifications as well as the Applicant's response to each or signposts the reader to where the issue has been addressed in the, February 2021, Supplementary ES. Only topics where Nicholas Pearson Associates have raised clarifications or further information requests have been addressed in Table 3.1.
- 3.1.4 A separate review of the Landscape and Visual Impact Assessment has been undertaken by MacFarlane & Associates, who have had ongoing involvement with the development on behalf of Guildford BC. Their review is included in Appendix 1 of this report.

Table 3.1 Original ES Review Comments and Applicant's Responses

Nicholas Pearson Associates Comments	Comment Type	Applicant's Response or Signposting	Thomson Comments
<i>Proposed Development</i>			
Chapter 3 of the ES describes the Proposed Development. Whilst Phase 1 of the Proposed Development is subject to a full planning application, the ES does not provide any more detailed information about this phase. It is recommended that GBC clarifies that any additional detail submitted with the planning application in relation to Phase 1 does not alter the assessment of any of the effects reported in the ES. It would have been helpful if the ES had provided details of the amount of land to be allocated to each land use with the Site, e.g. housing and open space.	Clarification	Chapter 5: EIA Methodology of ES Volume II (para 5.20 - 5.24) explains the approach to the EIA that, as the Proposed Development comprises a hybrid planning application (i.e. part detailed, part outline), the principles of the Proposed Development are established through a series of parameter plans. These plans set out the maximum building limits and establish a building envelope, and therefore represent a worst-case scenario for assessing significant effects. The phasing plan at Appendix 1.2 shows that the detailed phase is Phase 1 of the scheme. All topics are assessed on this basis, and in most cases, it is appropriate to consider the masterplan as a whole. Although the ES does not include figures on the amount of land allocated to housing and open space, this is clearly shown on the parameter plans set out at Appendix 1.2. There are also regular references to the quantum of housing throughout the ES.	Accepted. No further information required.
<i>Human Health</i>			
Paragraph 5.9 of the ES indicates that Health has been scoped out of the ES. This is in accordance with the scope agreed with GBC. It is recommended that GBC reviews the information submitted with the planning application, e.g. the Socio-Economic Statement, to ensure that these confirm that no significant impacts are anticipated.	Clarification	A standalone Health Impact Assessment (HIA) was prepared and submitted as part of the planning application as agreed with GBC as part of the EIA Scoping process.	Accepted. No further information required.

<p>Chapter 6: Transport and Access It is recommended that GBC seeks clarification of which routes within the study area would be considered 'sensitive' and which routes may experience existing issues, such as severance. This is particularly relevant in the context of cumulative effects, where cumulative traffic increases of more than 30% have been identified on some links. It is also recommended that consideration is given to whether issues such as severance currently affect the local road network.</p>	<p>Clarification</p>	<p>Severance issues associated with the Proposed Development are addressed in paragraphs 6.88 and 6.133 of Chapter 6: Transport and Access of ES Volume II. Further information on the sensitivity of road receptors is presented in Table 1: Link Sensitivity and % Impact of Appendix 1 of the supplementary ES, however this additional information does not alter the conclusions presented within the ES.</p>	<p>Accepted. No further information required.</p>
<p>Chapter 7: Noise and Vibration It is recommended that GBC seeks clarification regarding the noise bund and whether it would be affected by the future A3 slip road and secures implementation of the recommended mitigation measures.</p>	<p>Clarification</p>	<p>As set out in paragraph 2.6 of the Planning Statement, part of the application boundary (included in the outline element of this application) also extends into site allocation A42, which is allocated for a new north-facing slip road onto the A3. A small portion of this land is intended to be utilised for the provision of a landscape / noise bund, however the location of the proposed bund will not compromise the ability of the slip road to be delivered, as the bund will be located on 'surplus' land not required for the slip road construction. The application boundary has been drawn to include all the land within the applicant's ownership up to the boundary with the A3 for simplicity, however as detailed within the application drawings, the proposals effectively reserve the land southeast of the proposed bund for the slip road in accordance with Policy A42, and do not include any Proposed Development on this land.</p>	<p>Accepted. No further information required.</p>

<i>Air Quality</i>			
Chapter 8: Air Quality The ES acknowledges that the full results of the baseline air quality monitoring need to be submitted to GBC. It is recommended that GBC reviews the full results and any resultant revised assessment prior to the determination of the application. The need for this to be submitted as further information should be reviewed. It is recommended that GBC requires a Dust Management Plan and Construction Environmental Management Plan to be prepared.	Further Information	The results of the additional air quality monitoring and corresponding analysis will be prepared by MLM and submitted as supplementary environmental information by the end of April 2020 as agreed with the Council. Section A8.5 of Appendix 8.1 of ES Volume III sets out a range of standard mitigation measures to be implemented, which will be reviewed as the detailed design and construction methodology is finalised. A Dust Management Plan and Construction Environmental Management Plan will be prepared prior to the commencement of any works on-site and will be secured via an appropriately worded pre-commencement condition. Please refer to Appendix 2 of the supplementary ES for further details.	Updated Air Quality assessment is accepted. No further information required.
<i>Biodiversity</i>			
Chapter 9: Ecology and Nature Conservation The ES reports that the proposed SANG is required to mitigate a range of effects identified, including those on the Thames Basin Heaths SPA. Given the importance of the SANG, it is considered that further information should have been included in the ES regarding its location, design, the proposed timing and mechanism for its delivery and long-term management arrangements. It is recommended that GBC ensures that full details of the SANG and its effectiveness are available prior to the determination of the application. This may require the submission of further information to supplement the ES. Further	Further Information	A description of the SANG proposals is set out at paragraphs 3.45 and 9.183 – 9.184 of ES Volume II, with reference to relevant guidelines. The SANG will provide a range of seminatural habitats including wildflower meadow, native trees and hedgerows, sandy banks for rare arable flora, a wildlife pond, and restoration/conservation management of ancient woodland. As set out paragraph 9.155 the Site is considered to be of County importance to bats and is used for foraging and commuting, the impacts of which will be mitigated through the preparation of a lighting strategy. Natural England have not raised any objections to this approach in their response. As stated in paragraph 9.241 of Chapter 9: Ecology and Nature Conservation the detailed Lighting Strategy will be prepared prior to the commencement of works on-site and therefore, for the detailed element (Phase 1), it is recommended that this is secured via a pre-commencement condition. As the detailed design of the scheme develops the lighting strategy will also be	<p>With regards to the SANG, it is understood the planning application was for the principle of change of use for SANG and that the SANG itself is yet to be approved.</p> <p>Further information has been requested and provided by the applicant regarding 10m dark buffers around key habitats. This has also been reviewed by the SWT Ecologist, who is satisfied with the proposed approach. Areas where a 10m dark buffer cannot be achieved may require further consideration but this can</p>

information should also be considered in relation to the conservation management proposals for the ancient woodland. Whilst the principles of a Lighting Strategy have been set out in the ES, it is recommended that further details are provided in order to demonstrate that there would be no significant effects on bats and other light sensitive species.		prepared and submitted at the Reserved Matters stage, secured via an appropriately worded planning condition. Please refer to response prepared by ACD set out at Appendix 3 of the supplementary ES for further details. It should be noted that the provision of this information does not alter the conclusions presented within the ES.	be agreed with the planning authority through a suitable planning condition if necessary. Appendix 3 of the Supplementary ES contains parameter plans. We assume this should refer to Appendix 9.
Material Assets			
It is recommended that the need for an easement for the proposed underground cables be clarified and, if so, how this might affect the Proposed Development. It is also recommended that clarification is sought regarding the easements in relation to the remaining section of overhead cables and foul water sewer across the site and how they are accommodated within the Proposed Development.	Clarification	As set out in paragraph 3.12 of Chapter 3: Proposed Development and Alternative Considerations, discussions in relation to the relocation of the existing electricity pylons is ongoing and details of the anticipated works are set out in paragraph 4.12 of Chapter 4: Soils and Construction Methodology. The full details of the pylon relocation strategy are evolving as discussions with UKPN continue and as the detailed design develops and the final strategy is agreed. The installation of the cable is not considered likely to generate significant impacts to bat foraging/commuting, given that the easement will not be illuminated, and it will have tree canopies growing on either side of the easement. Where possible, trees will be retained, and a request will be made whereby UKPN directionally drill under the watercourse. Full details will be provided once the final strategy is agreed.	Accepted. No further information required.
Landscape and Visual Impact			
Chapter 10: Landscape and Visual Impact Assessment It is recommended that GBC reviews the baseline photographs and photomontages in consultation with their appointed consultants and consider whether they	Further Information	The site photographs and photomontages have all been prepared in accordance with relevant guidance, including Technical Guidance Note 06/191, Appendix 4, Paragraph 4.1.5. The quantity, location and type of photomontages to support the LVIA were agreed with GBC in advance of the planning application.	See comments from MacFarlane & Associates in Appendix 1.

need to be resubmitted in accordance with the latest Landscape Institute guidance. The need for further information in relation to the impacts of lighting should also be considered.		The Site is not considered to be an in an area sensitive to light pollution and this was not raised or agreed with GBC's appointed Landscape Consultants (Macfarlane Associates) as part of the pre-application discussions as being required. Given the location and nature of the Proposed Development i.e. a residential development in an area already strongly influenced by residential settlement, and in relatively close proximity to London, with a motorway running adjacent, it is considered unlikely that significant night-time effects will arise and would alter the conclusions presented within the ES. Please refer to Appendix 4 of the supplementary ES for further details.	
<i>Cumulative Effects</i>			
Chapter 12 of the ES considers combined effects. For a number of receptors more than one impact is identified but it is noted that the aspects do not interact with each other. It is recommended that GBC considers whether any of these combined effects could be considered significant.	Clarification	The methodology applied to the effect interactions assessment is set out in paragraphs 12.17-12.20 of Chapter 12: Residual Impacts, Mitigation and Cumulative Effects. As no effect interactions (i.e. in-combination effects) have been identified, the significance of the effects is no greater than for each individual residual effect as set out in Tables 12.1 and 12.2 of this ES Chapter.	Accepted. No further information required.
<i>Mitigation</i>			
Whilst the topic chapters generally describe the mitigation measures required in relation to significant adverse effects, the main area of concern is in relation to the proposed SANG. The ES does not contain sufficient information regarding the SANG, how it will be secured or its future maintenance and management. It is recommended that GBC ensures it has sufficient information regarding this	Further Information	A description of the SANG proposals (which is subject to a separate planning application) is set out at paragraphs 3.45 and 9.183 – 9.184 of ES Volume II, with reference to relevant guidelines. Please refer to response prepared by ACD set out at Appendix 3 of this document for further details. The mitigation measures identified (e.g. Landscape and Biodiversity Management Strategy) were documents prepared and submitted with the planning application.	It is unclear if the reference to Appendix 3 is for the original or supplementary ES. In the latter Appendix 3 contains parameter plans. Appendix 9 contains a report by ACD in relation to HRA, which does mention the SANG. However, it is understood the previous application (19/P/02240) was only for a Change of Use to facilitate SANG

<p>before determining the planning application.</p> <p>Other mitigation measures are also referred to in the ES, although details are not provided within it. E.g. Arboricultural Method Statement, Landscape and Biodiversity Management Strategy, Lighting Strategy. Again, GBC should ensure that the required mitigation can be secured through these means. Where necessary, additional information may need to be requested prior to determination of the application.</p>			<p>and not consent for the provision of the SANG.</p> <p>As such, there remains uncertainty over the deliverability of the SANG. A Grampian condition is recommended to ensure development does not commence until the location of the SANG is confirmed and consented.</p>
<i>Non-Technical Summary</i>			
<p>A separate Non-Technical Summary has been prepared. It is recommended that a revised NTS be prepared and submitted as part of any request for Further Information to address the issues identified within the NTS and main text.</p>	Observation	<p>The clarifications set out within the ES Review do not alter the conclusions in relation to significant effects presented within the ES, and as such an updated NTS is not required.</p>	<p>Whilst it is accepted that the changes to the proposed development do not alter the overall results of the EIA, Table 5 of the NTS would benefit from being expanded to provide a full summary of impacts, mitigation and residual effects. This would enable readers to see the findings of the EIA 'at a glance'.</p>
<p>The ES includes a range of maps, figures, tables and diagrams. Section 2.10 of this review recommends that GBC considers whether revised baseline photographs and photomontages should be prepared in accordance with latest Landscape Institute guidelines.</p>	Further Information	<p>Please refer to the response to EIA Regulatory Compliance Landscape and Visual Impact Assessment and Appendix 4 of the supplementary ES for further details.</p>	<p>Accepted. No further information required.</p>

<i>General</i>			
The ES includes a range of maps, figures, tables and diagrams. It is recommended that GBC considers whether revised baseline photographs and photomontages should be prepared in accordance with latest Landscape Institute guidelines.	Further Information	Please refer to the response to EIA Regulatory Compliance Landscape and Visual Impact Assessment and Appendix 4 of the supplementary ES for further details.	Accepted. No further information required.

4 Changes to the Proposed Development

4.1 Introduction

4.1.1 In 2020 the Applicant updated the design of the Proposed Development. The changes, in brief, comprised:

- Phase 1
 - Amendment to boundary, moving an area from detailed design to outline design.
 - Changes to the number, composition and layout of residential units
 - Introduction of a green corridor connecting the Central Green to a neighbouring development.
- Phases 2 & 3
 - Revision of access strategy including sustainable transport links
 - Amendments to illustrative masterplan and parameter plans
 - Change proportion of private to affordable housing to 60:40 respectively
 - Changes to local pedestrian and local road networks

4.1.2 As a result the Applicant, currently, proposes to develop the Site to include:

'Hybrid (part full/part outline) application comprising: Full planning permission for 220 residential dwellings (Use Class C3) and Travelling Showpeople plots (Sui Generis) with associated open space and landscaping, means of access, parking, drainage, utilities and infrastructure works, temporary and permanent acoustic fencing, and other associated works; and Outline planning permission, with all matters reserved except for access, for up to 300 residential dwellings (Use Class C3) with associated open space and landscaping (including a landscape bund and acoustic fencing), means of access, enabling infrastructure and other associated works.'

4.1.3 The amendments to the Proposed Development have been summarised in Table 4.1, below, with notes added regarding the suitability of currently available data in describing the potential significant effects that may arise as a result of the proposed changes. Recommendations for further information have been made where relevant.

Table 4.1 Review of Applicant's Assessment of Design Changes

Change to Proposed Development	Comment Type	Reviewer's Comments
<i>Phase 1</i>		
Amendment to the Phase 1 boundary.	No further information required	Amendment shown in Figure 19055 CO1 F. It is not anticipated that this will result in significant effects. It would be easier for the reader if the changes were highlighted – perhaps on a separate figure or more accurately described in the text of the supplementary ES.
Revisions to the layout and distribution of properties to rationalise the movement network, accommodate larger Sustainable Urban Drainage Systems (SuDS) basins and relocation of the bus stop further south along the Spine Road.	No further information required	<p>Details on the layout and distribution of properties, in the supplementary ES, is scant. Limited discussion of the changes is included in relation to Phase 2, but no information is included in the body of the supplementary ES for Phases 1 or 3. The exclusion of Phase 1 from the parameter plans makes it difficult for the reader to understand potential effects arising from changes to the proposed development. However, the landscape and visual impacts have been reviewed by an independent consultant and are considered acceptable (see Appendix 1 of this report).</p> <p>The location of the bus stop, within the development, is unlikely to represent a significant effect in terms of EIA.</p>
Introduction of primary green corridor connecting the Central Green with the neighbouring Oldlands development to the west of the Site with additional secondary green links within the Site.	Clarification/Potential Further Information	The proposed green corridor is mentioned only in Chapter 2, 'Changes to the Proposed Development', para. 2.7. No details for the green corridor, either in terms of spatial extent or purpose, are provided in the supplementary ES. Additionally, no clear information is presented on the parameter plans, site location plan or landscape masterplan. It would be helpful for the applicant to clarify whether the green corridor is being provided as a form of mitigation or merely an enhancement to the proposed development. If it's mitigation, additional information should be provided to demonstrate its effectiveness.

Change to Proposed Development	Comment Type	Reviewer's Comments
Revised mix of dwelling sizes.	No further information required	The mix of dwelling sizes are summarised in Table 2.3. It is noted that the change in dwelling sizes tends towards an increase in larger dwellings. However, as per para. 3.8, the total number of dwellings proposed remains the same. It is anticipated that the changes in dwelling sizes are unlikely to result in significant impacts.
Revisions to the SuDS proposals to remove SuDS provision from active spaces and reallocate to defined areas.	No further information required	The Applicant notes in Table 7.1 that SuDS have been moved from active places, in-line with consultation responses received from GBC. As with many of the changes to design it would be helpful if the Applicant had provided a summary of the changes or a figure visually representing them. Reallocation of SuDS provision within the site is not anticipated to result in significant effects.
Revisions to the architectural proposals, including review of the material palette and distribution following consultation with officers as set out within the Design and Access Statement Addendum.	No further information required	It is unclear in which of the 18 parts of the DAS this information is to be found or what these changes comprise. As with other changes this would be easier to understand if the Applicant made clear comparative tables or figures. Para. 2.7 notes that the updates have been made in consultation with Guildford Borough Council and para's 7.24 to 7.32 of the supplementary ES advise the overall distribution and massing of the proposed development is largely occluded from view in relation to sensitive receptors and as such is unlikely to have a significant visual impact.
Squares added on spine road at junctions with ends of secondary streets.	No further information required	This is unlikely to have a significant effect in terms of EIA and it is unclear why this has been included in the supplementary ES.
Omission of the shelter from the Central Green and provision of additional parallel parking spaces along the southern edge.	No further information required	This is unlikely to have a significant effect in terms of EIA and it is unclear why this has been included in the supplementary ES.
Phases 2 and 3		
Revisions to the access and movement strategy – Including the footway and cycle lane improvement to and from Send and relocation of the Toucan crossing on Send Road to opposite	No further information required	The supplementary ES discusses the proposed changes in Chapter 3. The individual interventions are discussed and it is confirmed that Surrey County Council, in their capacity as Local Highways Authority, have

Change to Proposed Development	Comment Type	Reviewer's Comments
Send Primary School from the northern arm of the Send Barns Lane/Portsmouth Road roundabout.		approved the proposed changes. It is not anticipated that this will result in significant effects.
Amendments to the Illustrative Masterplan layout for these phases to reduce the number of apartment blocks.	Clarification	It is unclear, from a comparison of the Illustrative Masterplan dated January 2020 on Guildford Borough Council's planning portal with the masterplan included with the supplementary ES, where reductions in the number of apartment blocks are to be found. The supplementary ES provides no discussion of these changes. An amended version of the masterplan highlighting where these changes are, should ideally be provided.
Amendment to the housing heights on the parameter plan to reflect the Illustrative Masterplan changes.	No further information required	A comparison of the parameter plans clearly indicates the proposed changes in maximum storeys for Phase 2 and 3 of the proposed development, however, as noted previously it is not possible to discern these changes in the Illustrative Masterplan documents. Also, it is unclear if the changes in height, in combination with the increase of taller dwellings, will have significant effects. However, in terms of clarity in the changes to dwelling heights shown in the parameter plans, no further information is required.
Revised proportion of affordable housing provision to achieve a 60:40 (private: affordable) mix.	No further information required	The change to the proportion of affordable to private housing is clearly represented in Table 2.3 of the supplementary ES. The change comprises a reallocation of 11 dwellings from the 'custom build' category to the 'private' category and does not include a reduction in affordable housing. Although information regarding this design evolution is not present in the ES, the change is not anticipated to have significant effects, in EIA terms.

5 Conclusions

5.1 Introduction

- 5.1.1 This section provides a brief overview key points from the previous sections of this report and makes recommendations in relation to the report reviewed.

5.2 Summary

- 5.2.1 The report is divided into two key sections.
- 5.2.2 The first section reviews the information provided in the Supplementary ES and associated addenda against the ES review comments provided against the Applicant's initial, 2019, ES. Additional comments have been provided to illustrate whether the Applicant's response fully addressed the Nicholas Pearson Associates review comments with additional information requested where appropriate.
- 5.2.3 The second section of this report assesses the information provided in the Supplementary ES and associated addenda against the design changes which occurred subsequently to the submission of the initial ES. Again, comments have been provided highlighting areas where additional clarification or further information is needed.
- 5.2.4 The Applicant has set out their responses to the review of their initial ES by Nicholas Pearson Associates in Appendix A2 of the Supplementary ES. The responses largely address the comments provided by Nicholas Pearson Associates and the reader is sign-posted to additional information elsewhere in the document. However, additional information is requested where appropriate. Full details are found in Table 3.1. A separate review of the Landscape & Visual Assessment has also been undertaken by MacFarlane & Associates (Appendix 1 of this report).
- 5.2.5 In assessing the subsequent design changes, the list of changes provided in Chapter 2 of the Supplementary ES were tabulated. The additional information provided in the Supplementary ES were used to assess whether these changes were likely to result in significant effects, as commonly understood within the context of EIA. Where additional information was deemed necessary to make this assessment it was highlighted in Table 4.1. The assessment highlights that there are several areas where the supplementary ES does not provide adequate information in relation to the changes in design.

5.3 Recommendations

- 5.3.1 The Supplementary ES would strongly benefit from use of tables detailing all design changes with comparative text highlighting the differences to the original ES. Additional benefit would come from inclusion of figures providing a visual comparison of the differences. As it stands, information relating to the design changes in the ES is often presented in a confused and unclear manner making it difficult for the reader to interpret the changes and their relative potential for significant effects.
- 5.3.2 Whilst the Supplementary ES states there is no change in conclusions from the original ES, despite the subsequent design changes, some proposed changes have the potential for significant effects and further clarification, or additional information is needed.

Appendix 1 – Review of LVIA by MacFarlane & Associates

M A C F A R L A N E + A S S O C S

U R B A N & E N V I R O N M E N T A L L A N D P L A N N I N G



GARLICK'S ARCH, SEND

REVIEW OF LVIA ADDENDUM
SUBMITTED AS PART OF SUPPLEMENTARY ENVIRONMENTAL STATEMENT

7th May 2021

Commissioned by
Guildford Borough Council



1. SCOPE OF THE REVIEW:

- 1.1. This report by Macfarlane + Associates, on behalf of Guildford Borough Council, reviews the Land at Garlick's Arch LVIA Addendum, a portion of the Supplementary Environmental Statement issued from Barton Willmore February 2021, Commissioned by London Strategic Land.

2. INTRODUCTION:

2.1. TIMELINE

Barton Willmore December 2019 Land at Garlick's Arch Environmental Statement and LVIA issued.

Macfarlane + Associates June 2020 Final Review and Recommendations of LVIA issued.

Barton Willmore February 2021 Land at Garlick's Arch Supplementary Environmental Statement and LVIA Addendum issued, following consultation with GBC in period following initial ES (December 2019).

3. ANALYSIS OF SUPPLEMENTARY ENVIRONMENTAL STATEMENT CHAPTER 7, LANDSCAPE AND VISUAL IMPACT ASSESSMENT:

- 3.1. This review addresses the specific points contained within Chapter 7 with regards to both the quality of the update, and the rationale behind the decision to update this information.
- 3.2. Table 2.1 Parameter plans accompanying the ES (August 2020) and Supplementary ES (February 2021) lists the following plans:
- Land Use Parameter Plan 19055-C01C (Dec 2019) and 19055-C01F (Feb 2021)
 - Access and Movement Parameter Plan 19055-C02C (Dec 2019) and 19055-C02F (Feb 2021)
 - Landscape Parameter Plan 19055-C03C (Dec 2019) and 19055-C03F (Feb 2021)
 - Building Heights Parameter Plan 19055-C04C (Dec 2019) and 19055-C04F (Feb 2021)
 - Density Parameter Plan 19055-C05C (Dec 2019) and 19055-C05F (Feb 2021)
- 3.3. (Note: see Appendix A for parameter plans referenced as part of this review.)
The following changes are observed in the parameter plans as compared, from December 2019 to February 2021 issues:
- 3.3.1. Land Use Parameter Plan**
- Phase one is subject to detailed planning application and is not shown on the 2021 Land Use Parameter Plan.
 - The dimensions of the traveling showpeoples' site have changed. Area appears to have increased in size.
 - Open space layout on site has been altered.
- 3.3.2. Access and Movement Parameter Plan**
- Primary vehicular access has changed location, possibly as a result of phase two not being shown on the plan.
- 3.3.3. Landscape Parameter Plan**
- Swales and SuDS basins are not shown on the 2021 parameter plan.
 - Modifications to play strategy are observed.
 - Open space layout alterations are observed.
- 3.3.4. Building Heights Parameter Plan**
- Area in centre of site is changed from maximum two storeys to maximum 2.5 storeys.
 - Phase one is subject to detailed planning application and is not shown on the 2021 plan.



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- The area of three storey maximum height structures on the southern boundary, with frontage on the A3, has increased in size.

3.3.5. Density Parameter Plan

- Phase one is subject to detailed planning application and is not shown on the 2021 plan.

(All text extracted from the Barton-Willmore Supplementary ES shown in blue)

(All Chapter headings in blue are extracted from the Supplementary ES)

Updated Legislation and Policy Context

7.3 There are no updates to the policy context detailed within Chapter 10: Landscape and Visual Impact Assessment of the ES (December 2019).

Updated Assessment Methodology and Significance Criteria

7.4 There are no updates to the assessment methodology and significance criteria detailed within Chapter 10: Landscape and Visual Impact Assessment of the ES (December 2019).

M+A RESPONSE

- The Guildford Borough Council adopted their local plan 25 April 2019. The NPPF was updated on 19 February 2019.
- Barton Willmore states that the same methodology is applied to the supplementary LVIA as was utilised in the Dec.2019 LVIA, found in Ch.10 Assessment Methodology 10.33 – 10.38 and Significance Criteria 10.39 – 10.40, Figure 10.1 and Tables 10.1 and 10.2.

M+A CONCLUSION

- We agree with the above, legislation and policy updates precede both the December 2019 LVIA and the supplementary February 2021 LVIA.
- We cannot verify that the exact methodology utilised was consistent to both assessments.

Updated Baseline Conditions

7.5 There are no updates to the baseline conditions detailed within Chapter 10: Landscape and Visual Impact Assessment of the ES (December 2019).

7.6 No new or updated Landscape Character Assessments pertaining to the Site of the study area have been prepared in the period since the preparation of the ES (December 2019).

M+A RESPONSE

- Barton Willmore states that there are no updates to the baseline conditions relevant to the supplementary LVIA, and that the Dec.2019 LVIA Baseline Conditions found in Ch.10 10.41 – 10.95 are still applicable to the assessment.

M+A CONCLUSION

- Without a site visit and extensive research into potential changes to the baseline conditions for the site, we are not able to verify whether this is an accurate statement.
- The most recent landscape character assessments for Guildford Borough, provided by their website, were issued in 2007. Therefore, this statement appears to be accurate.

Changes to Supporting Material

7.7 The photo-montages prepared to support the LVIA have been updated to reflect the changes to the Proposed Development as set out in this Supplementary ES (February 2021) and further information available with respect to existing proposals. These are included in Appendix A10.

7.8 The Visually Verifiable Montages (VVMs) prepared by Realm have been updated to take account of the following:



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- Updated Phase 1 details for proposed built form;
 - Updated parameter plans for building height and footprints for Phases 2 and 3 in order to demonstrate worst case scenario; and
 - Updated proposals for undergrounding of OPLs, removal of existing pylons and provision of new terminal pylons as per drawings prepared by UK Power Networks (UKPN).
- 7.9 The 'digital mock up view' montage prepared by Barton Willmore to approximate views from the A3 has been updated to reflect the revised indicative masterplan for Phase 2 and include the revised maximum parameters.

M+A RESPONSE

- Above points to be reviewed in the following sections of the report.

Updated Assessment of Effects (Construction and Operational)

- 7.10 As set out in Section 2 of this Supplementary ES (February 2021), a number of amendments have been made to the design of the Proposed Development since the ES (August 2020) was submitted. Additional information has also been made available with respect to elements of the Proposed Development that have already been taken into account, including the re-positioning of the electricity pylons and the temporary acoustic fence. These points have been considered in further detail on a thematic basis and with reference to the effects identified in the ES (December 2019). Where any of the effects identified in the original assessment are considered to have changed, the revised effects are set out.
- 7.11 The assessment of effects carried out as part of this addendum is in accordance with the LVIA methodology appended to the ES (December 2019).

M+A RESPONSE

- Table 2.1 Parameter plans accompanying the ES (August 2020) and Supplementary ES (February 2021) described above noting the observed changes from December 2019 to February 2021.

M+A CONCLUSION

- The changes to the development, and the subsequent changes to the assessment of effects, appear to have been addressed through the addendum to the LVIA.

Temporary Acoustic Fence

- 7.12 The detailed Phase 1 proposals include the construction of a temporary timber-built acoustic fence with a height of 5m to mitigate noise impacts from the A3. It is understood that this fence will be in place during the construction of Phase 1, however it will be replaced by the permanent bund and acoustic fence along the A3 provided as part of the construction of the outline element of the application (Phases 2 and 3). The permanent solution will be subject to detailed design and a subsequent reserved matters application.
- 7.13 The temporary fence is likely to be visible in views experienced by People travelling on the A3 (Ripley By-Pass), People travelling on the A247 (Clandon Road) and People travelling on Burntcommon Lane.
- 7.14 The duration of the construction works has not changed, and the temporary fence will be seen in the context of construction activities across the Site, which are considered to be the primary source of adverse effects. In views from the A3, the temporary fence will be seen at a distance of at least 25m and transiently in the context of a busy major road, and at an oblique angle to the direction of travel.
- 7.15 Furthermore, the fence itself will provide a degree of screening of Phase 1, thereby having the potential to mitigate adverse visual effects relating to visibility of construction activities and equipment seen from the A3. In the other views, the fence will be seen at a greater distance from



an elevated position or from across the Site where visual effects will primarily result from the construction of the Proposed Development in its entirety.

- 7.16 On this basis, the construction phase effects identified in Chapter 10: Landscape and Visual Impact Assessment of the ES (December 2019) are not considered to have changed as a result of these works.

M+A RESPONSE

- As stated, the acoustic fence is in context on a busy major road and views are transient and at an oblique angle, and may in fact assist in mitigating adverse views related to construction activity.
- Where views are from an elevated position or from across the site, the fence will be less obtrusive to the view because of the contextual construction of proposed development.
- The temporary fence is to be replaced with a permanent fence and bund as part of a subsequent application.

M+A CONCLUSION

- We agree with the assertion that the construction phase effects are not considered to have changed as a result of these works.

Overhead Power Lines and Pylons

- 7.17 At the time of writing Chapter 10: Landscape and Visual Impact Assessment of the ES (December 2019) discussions with UKPN regarding the proposals to remove the existing Overhead Power Lines (OPL) and the pylons from the Site were ongoing. The findings of the assessment were based on the general principle of the removal of three pylons and the associated spans of cables from within the Site interior, and thus typically noted that visual receptors who currently have views of the OPLs and pylons would experience beneficial effects as a result of their removal, with beneficial effects also identified with respect to the character of the Site itself due to a reduction in the influence of infrastructure on local character.

- 7.18 Discussions with UKPN remain ongoing however UKPN have now provided indicative designs for the proposed new terminal pylons that will replace the existing pylons to the west of the Site (with a temporary pylon provided during the works), and the north-east of the Site.

- 7.19 Full details of the current proposals, including the locations and appearance of the proposed terminal pylon are set out in the following drawings provided by UKPN and included in Appendix A10:

- Drawing 9966-UKPN-DR-105905-85-006 indicates the position, layout and elevation of temporary pylon PPA25T approximately 52m north-west of the existing pylon (PPA25) to the west of the Site. Pylon PPA25T is approximately 5.8m shorter than the existing pylon.
- Drawing 9966-UKPN-DR-105905-85-005 demonstrates that the proposed permanent terminal pylon (PPA25R) to the west of the Site will be located in approximately the same location as the existing pylon and will be approximately 8.9m shorter than the existing pylon.
- Drawing 9966-UKPN-DR-105905-85-007 shows the location and elevation for the proposed terminal pylon in the northern-eastern part of the Site with a total height of 38.4m

- 7.20 The above proposals are not considered to have any additional measurable effect on the landscape receptors identified in Chapter 10: Landscape and Visual Impact Assessment of the ES (December 2019) due to the likely short duration of construction activities and the existing presence of electrical transmission infrastructure within the Site.

- 7.21 In terms of visual effects relating to the construction of the western pylon, Residents on Clandon Road are likely to have views of the temporary pylon and the activities relating to the demolition of the existing/temporary pylon and construction of the proposed temporary and permanent pylons.



However, these effects are likely to occur over a limited duration and will be experienced in the context of construction activities on Clandon Road and within the Site. They are therefore unlikely to result in a change to the moderate adverse (temporary, significant) effect identified in Chapter 10: Landscape and Visual Impact Assessment of the ES (December 2019).

M+A RESPONSE

- The assertion by Barton Willmore that the duration of construction is 'likely to occur over a limited duration' is not a substantiated argument, as many factors can delay construction activities and prolong the duration of the project.

M+A CONCLUSION

- Due to the perception of construction activities during construction phase, we agree that the effects on receptors is unlikely to change as a result of this activity.

7.22 Road users travelling along the A3 and the A247 are likely to have temporary views of construction activities and temporary infrastructure relating to the proposals for the western pylon, however in the context of existing views that include electricity transmission infrastructure and perceived alongside construction activities on the Site itself, the significance of effect for both receptors will not change from the minor adverse (temporary, not significant) effect identified in Chapter 10: Landscape and Visual Impact Assessment of the ES (December 2019).

M+A CONCLUSION

- Due to the existing electricity transmission infrastructure as well as perception of construction activities during construction phase, we agree that the effects on receptors from the A3 and the A247 is unlikely to change as a result of this activity.

7.23 Residents of houses abutting the Site on Kiln Lane are likely to have views of activities relating to the construction of the north-eastern terminal pylon, located approximately 56m from the rear elevation of two semi-detached houses properties. These effects will be experienced for a relatively short duration and seen in the context of existing views of OPL/Pylons however due to closer range views of emerging and completed infrastructure for residents of these specific properties such that the effects would be minor adverse (temporary, not significant) during the construction phase. This is slightly worse than the negligible adverse (temporary, not significant) effect identified within Chapter 10: Landscape and Visual Impact Assessment of the ES (December 2019), although this is still considered to be not significant.

M+A RESPONSE

- The assertion by Bart Willmore that the effects from construction activity will be 'experienced for a relatively short duration' is not a substantiated argument, as many factors can delay construction activities and prolong the duration of the project.

M+A CONCLUSION

- Due to the existing electricity transmission infrastructure as well as perception of construction activities during construction phase, we agree that the effects on the residences abutting the site on Kiln Lane have been made worse by the construction of the north-eastern terminal pylon.

Design Changes to Phase 1 (Detailed Element)

7.24 With respect to views from existing publicly accessible vantage points, the amendments to Phase 1 are not considered to result in any measurable change in the significance of effects identified in Chapter 10: Landscape and Visual Impact Assessment of the ES (December 2019). This is supported by the amended VVM provided for View 3A, which demonstrates that the view from Burnt Common



Lane has not been materially altered as a result of the design changes, and the remainder of the VVMs, which show that the amendments do not have an impact on the wider visibility of the Proposed Development from the landscape to the south.

- 7.25 Notwithstanding the above, the enlargement of the proposed SuDS basin adjacent to the proposed Portsmouth Road roundabout and associated stepping back of built form is considered to be a positive design change that will alter the composition of views from Portsmouth Road so as to be more strongly influenced by the landscape proposals. However, the balance of positive and negative effects for this receptor is judged as having the same outcome in significance terms as that set out in Chapter 10: Landscape and Visual Impact Assessment of the ES (December 2019).
- 7.26 Consequently, no changes to the operational effects presented within the ES (December 2019) are anticipated as a result of the design amendments to Phase 1.

M+A CONCLUSION

- We agree that the design changes have not significantly altered the views from Burnt Common Lane, and that expanding the SuDS basin will positively influence the views from Portsmouth Road.

Parameter Plans

- 7.27 As shown by the VVMs the changes to the parameter plans proposals do not materially alter the likely visibility of the Proposed Development in vantage points in the landscape to the south of the Site where the Proposed Development is almost entirely screened by intervening vegetation.
- 7.28 Further to the south, in views experienced by Users of the Road network within the Surrey Hills AONB, the changes to Proposed Development (and consideration of the potential visibility of the maximum parameters) are unlikely to be perceptible due to the considerable distance to the Site.

M+A RESPONSE

- The exact distance to the Surrey Hills AONB is not specified in the report.
- 7.29 With respect to visual receptors travelling along the A3, the updated 'digital mock-up' photo-montage demonstrates that changes to the indicative built form proposals for Phase 2 have not materially altered the views potentially experienced from this major road. However, the inclusion of the updated maximum parameter for building height in Phase 2 does indicate that built form could potentially lead to greater visual impact than the indicative built form proposals.

M+A RESPONSE

- Noted.
- 7.30 Nonetheless, given the sensitivity of visual receptors travelling along this route is identified as low and the effects relating to the Proposed Development are experienced for a relatively brief duration, travelling at speed and at an oblique angle to the direction of travel, the impact of the inclusion of built form up to the maximum parameter is not considered likely to give rise to effects greater in adverse significance than that identified in Chapter 10: Landscape and Visual Impact Assessment of the ES (December 2019) at Year 1 (i.e. moderate adverse).
- 7.31 At Year 15, the proposed planting along the bund provides substantial screening of the indicative built form proposals on which the assessment is based, and therefore the negligible adverse effect identified in Chapter 10: Landscape and Visual Impact Assessment of the ES (December 2019) remains unchanged.
- 7.32 Consequently, no changes to the operational effects presented within the ES (December 2019) are anticipated as a result of the design amendments to Phases 2 and 3.

M+A CONCLUSION



- We agree with the conclusion that the combination of speed of travelling vehicles, oblique angle, and proposed planting of a bund create a scenario where there are no changes to operational effects with regards to the design amendments.

Overhead Power Lines and Pylons

7.33 There will be an increased effect significance for residents along Kiln Lane during the operational phase due to closer range views of emerging and completed infrastructure for residents of these specific properties. This would result in a minor adverse (temporary, not significant) effect at Year 1, which is slightly worse than the negligible adverse (temporary, not significant) effect identified within Chapter 10: Landscape and Visual Impact Assessment of the ES (December 2019), although this is still considered to be not significant.

M+A RESPONSE

- Noted.

7.34 At Year 15, following establishment of proposed planting as set in the Illustrative Landscape Masterplan (Drawing ref: LN-LD-02), views of the new terminal pylon will be substantially screened to the height of proposed vegetation (typically 6-8m after 15 years). However, due to the height of the proposed pylon, it would be seen to rise above this vegetation where views towards the sky are possible, such as within gardens. The presence of existing OPL in these views limits the effect significance, however the presence of the proposed terminal pylon is considered likely to result in a negligible adverse (not significant) effect at Year 15 for nearby visual receptors including LCA CW1 / C1 the Merrow and Clandon Woodland North Down, people travelling along the A247, Grove Heath Road, and Rose Land, residents on Burnt Common Lane, Kiln Lane and residents in Send Marsh / Burnt Common, which is slightly worse than the neutral effect identified in Chapter 10: Landscape and Visual Impact Assessment of the ES (December 2019).

7.35 As demonstrated by the revised VVMs, in views from further afield, the proposed terminal pylons constitute a virtually imperceptible change and as such the effects identified at Year 1 within the ES (December 2019) are unchanged.

7.36 Aside from residents along Kiln Lane as discussed above, the operational effects with respect to LVIA receptors remain consistent with those presented in Chapter 10: Landscape and Visual Impact Assessment of the ES (December 2019).

M+A CONCLUSION

- We agree that the proposed pylon will be tall enough to be seen above vegetation where views towards the sky are possible, and is likely to result in a negligible adverse (not significant) effect at Year 15 for nearby visual receptors.

Off-Site Works

7.37 The off-site works are understood to comprise limited widening of Kiln Lane opposite the White House to provide access to the Travelling Show People plot and allow passage for larger vehicles. The works will involve widening the existing road by 1.5m into an area of grass verge whilst avoiding root protection areas and comprise could comprise limited vegetation removal; and upgrades to footways on the existing highway network in areas of settlement around the Site. The latter does not result in any impact on existing trees whilst the former is understood to only require limited clearance of overhanging vegetation to facilitate vehicles to pass on the road. The proposed upgrades to existing footways themselves are not considered to lead to any measurable effect on landscape character or visual amenity.



7.38 On this basis, these measures have been considered not to result in any additional effects on the landscape and visual receptors identified in Chapter 10: Landscape and Visual Impact Assessment of the ES (December 2019).

M+A CONCLUSION

- We agree that the above measures will not have additional effects on receptors as stated.

Additional Mitigation Measures

7.39 There are no further updates to mitigation measures set out within Chapter 10: Landscape and Visual Impact Assessment of the ES (December 2019).

M+A RESPONSE

- We have reviewed the remaining views assessed in the original LVIA (Dec 2019) and ascertained that they are not impacted by the subsequent scheme changes.

M+A CONCLUSION

- We agree with the assessment and the conclusions of Barton Willmore in the addendum to the LVIA.

Updated Effect Interactions and Cumulative Effects

7.40 Taking into consideration the additional cumulative schemes identified, there are no further updates to the effect interactions and cumulative effects set out within Chapter 10: Landscape and Visual Impact Assessment of the ES (December 2019).

M+A RESPONSE

- We have reviewed the cumulative effects assessed in the original LVIA (Dec 2019) and ascertained that they are not impacted by the subsequent scheme changes.

M+A CONCLUSION

- We agree with the assessment and the conclusions of Barton Willmore regarding cumulative effects in the addendum to the LVIA.

Summary and Conclusions

7.41 A comprehensive review of the updated Proposed Development has been undertaken with reference to the effects identified as part of LVIA.

7.42 Following receipt of further information with respect to UKPN's proposals for the undergrounding of existing OPLs a single visual receptor has been judged likely to experience a greater significance of visual effect as a result of the Proposed Development. However, the revised effect remains not significant in EIA terms.

7.43 The conclusions presented in Chapter 10: Landscape and Visual Impact Assessment of the ES (December 2019) remain valid in that the Site has the capacity to accommodate the Proposed Development without undue harm on the landscape character and visual amenity of the Site and the wider area. The Proposed Development would lead to tangible long-term benefits on the landscape features of the Site and the character and general amenity of the local area.

7.44 There are no further updates to the assessment of potential effects detailed within Chapter 10: Landscape and Visual Impact Assessment of the ES (December 2019).

4.0 CONCLUSIONS OF REVIEW:

4.1. CONCLUSIONS AND RECOMMENDATIONS



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- The conclusion of this review is that the LVIA Addendum appraisal has followed a sound and thorough methodology, in accordance with relevant legislation, and has addressed impact and sensitivity of receptors to the changes to the proposed development.
- The appraisal makes a professional judgement that the changes to the proposed development that have arisen since the original LVIA issued in Dec. 2019 do not significantly alter the conclusions of the LVIA, with the exception of minor changes to effect as stated above.
- We agree with the recommendation of this assessment.

APPENDIX A

COMPARATIVE PARAMETER PLANS

GARLICK'S ARCH, SEND

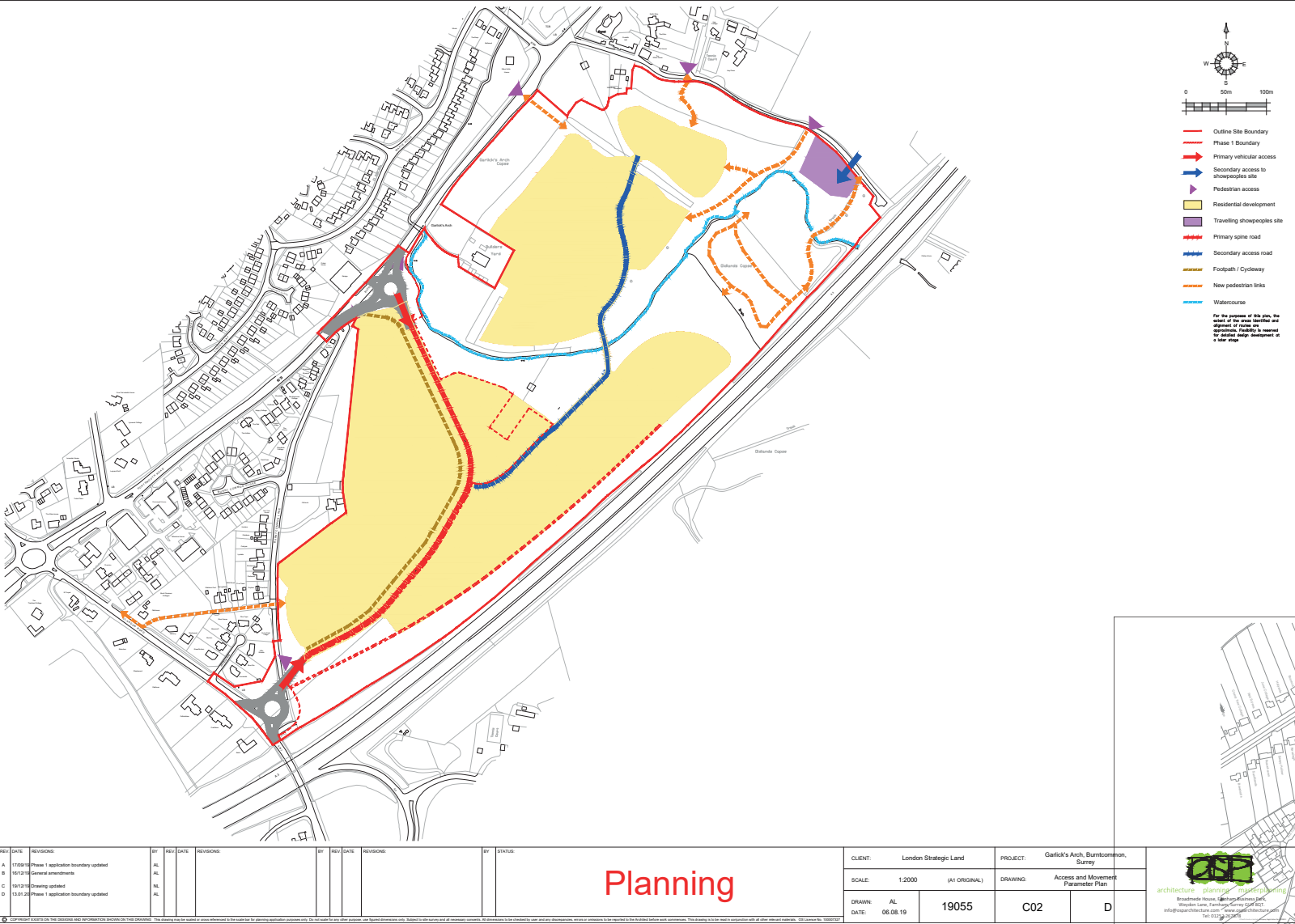
REVIEW OF LVIA ADDENDUM
SUBMITTED AS PART OF SUPPLEMENTARY ENVIRONMENTAL STATEMENT



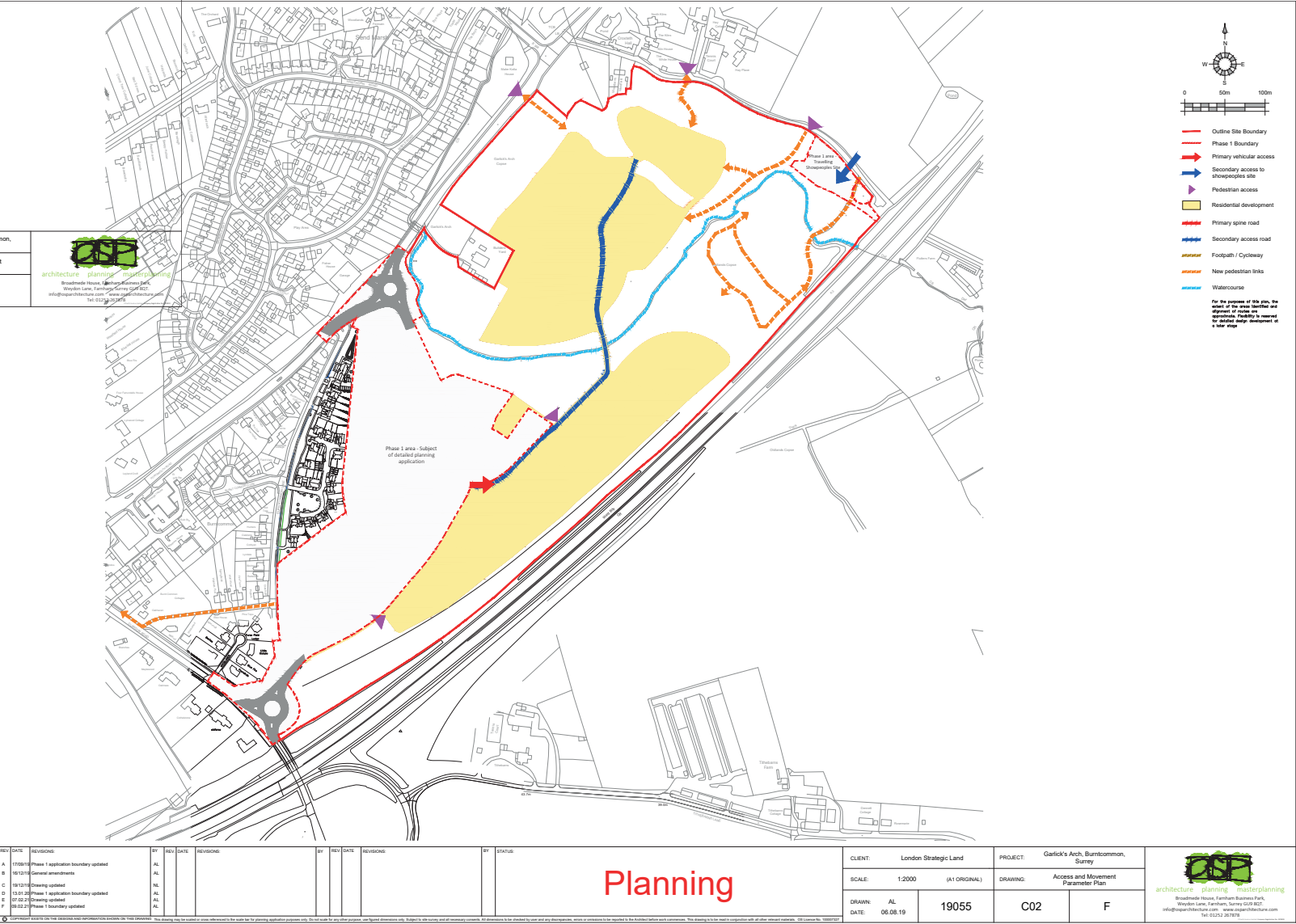


February 2021





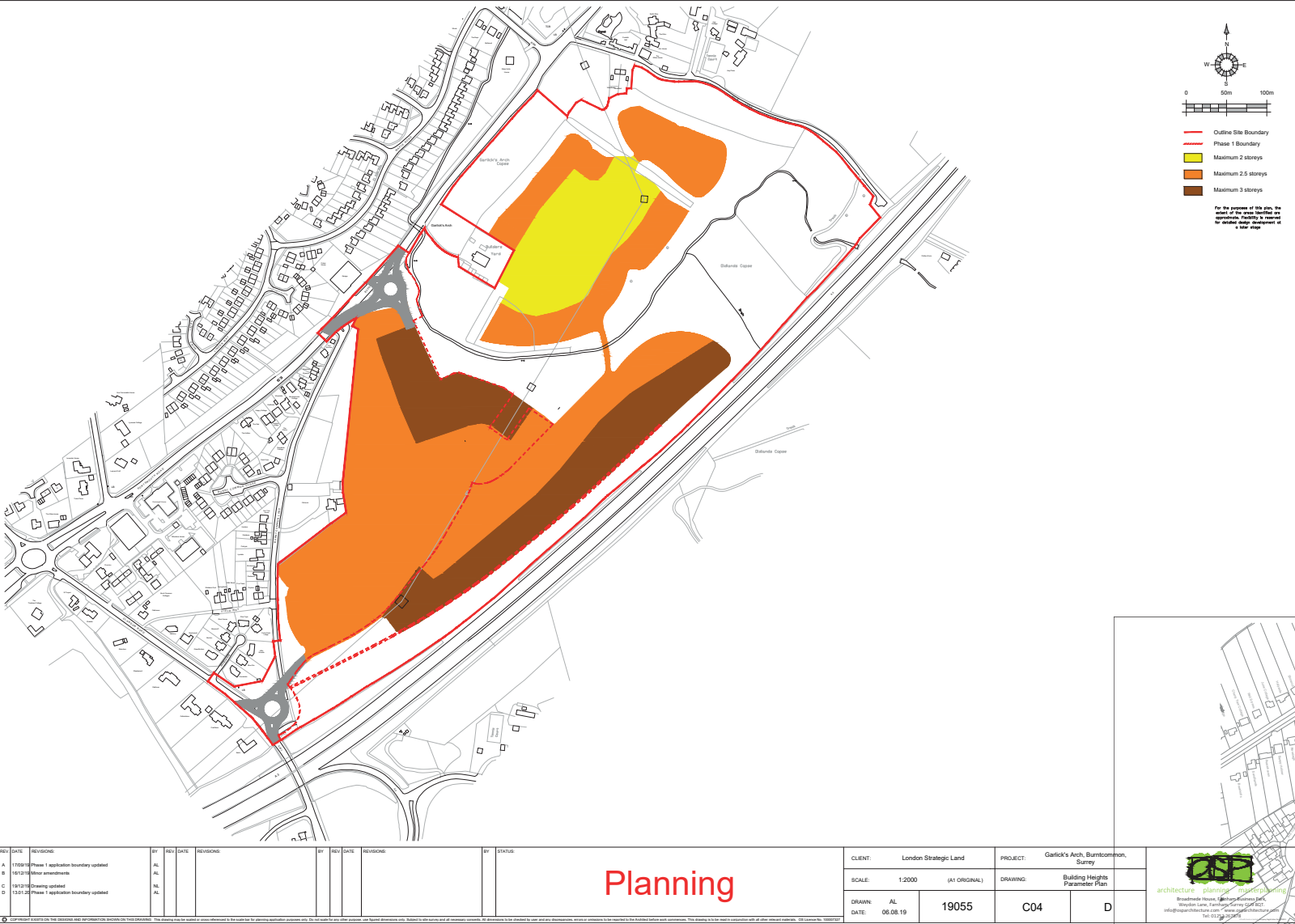
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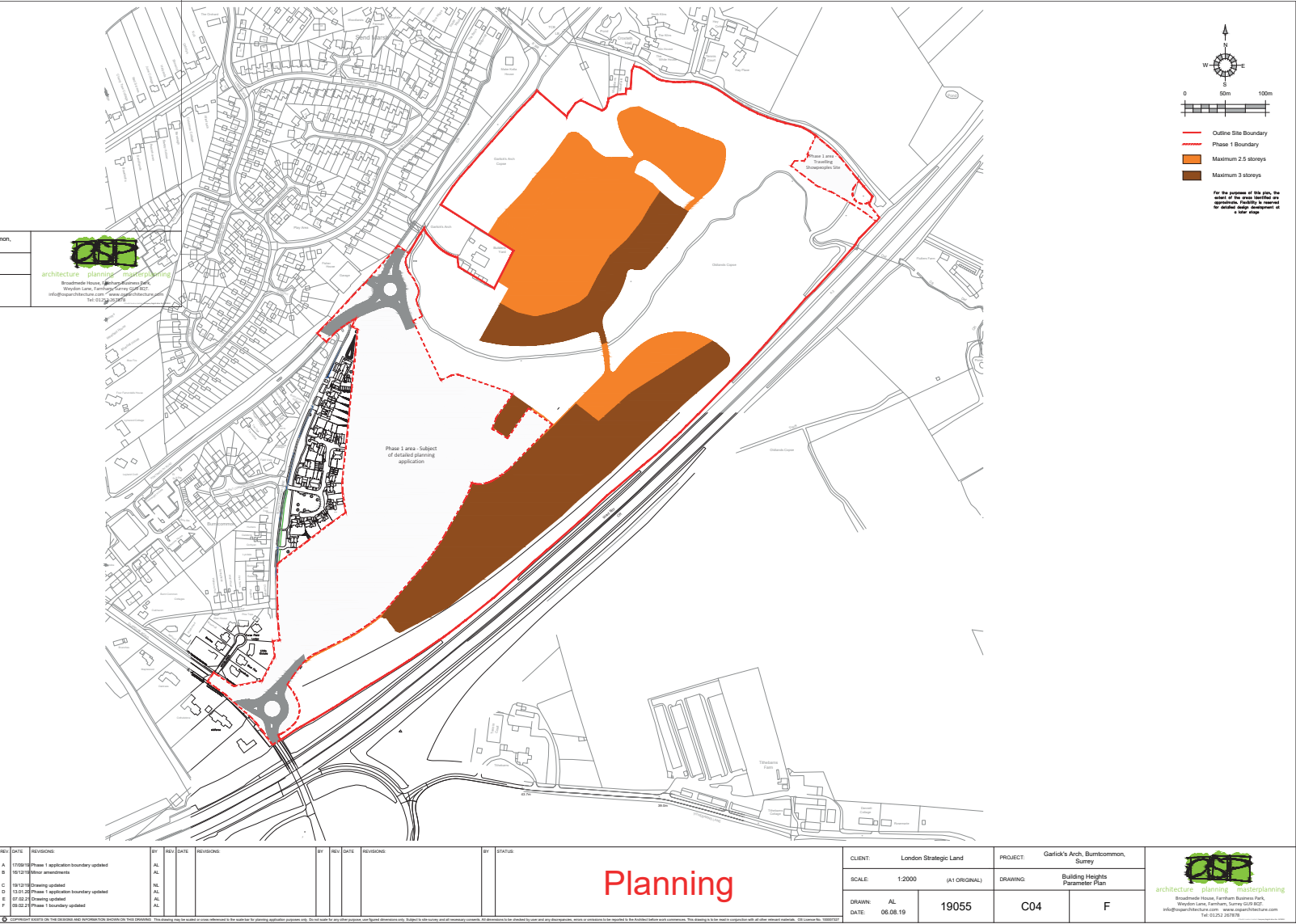


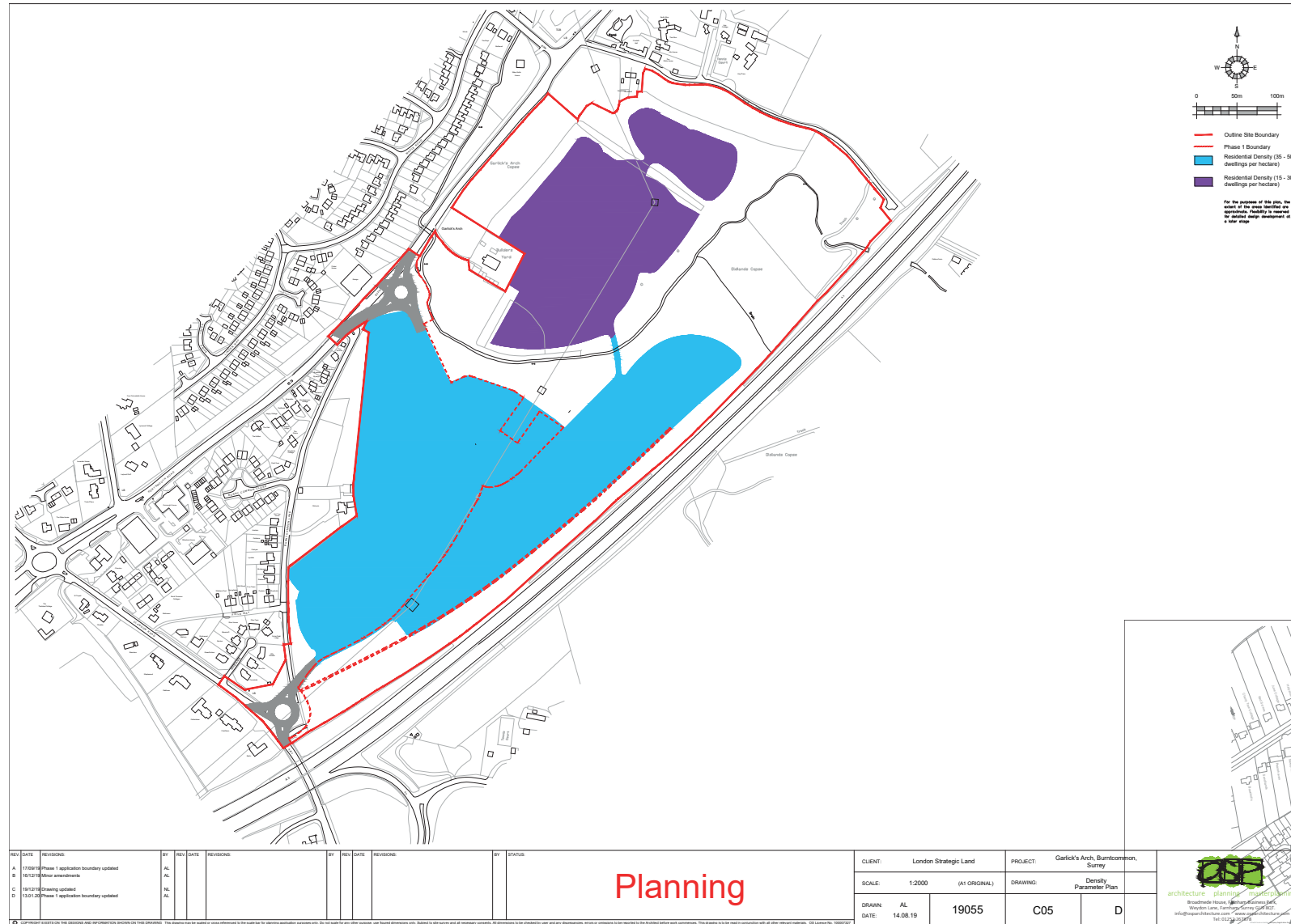
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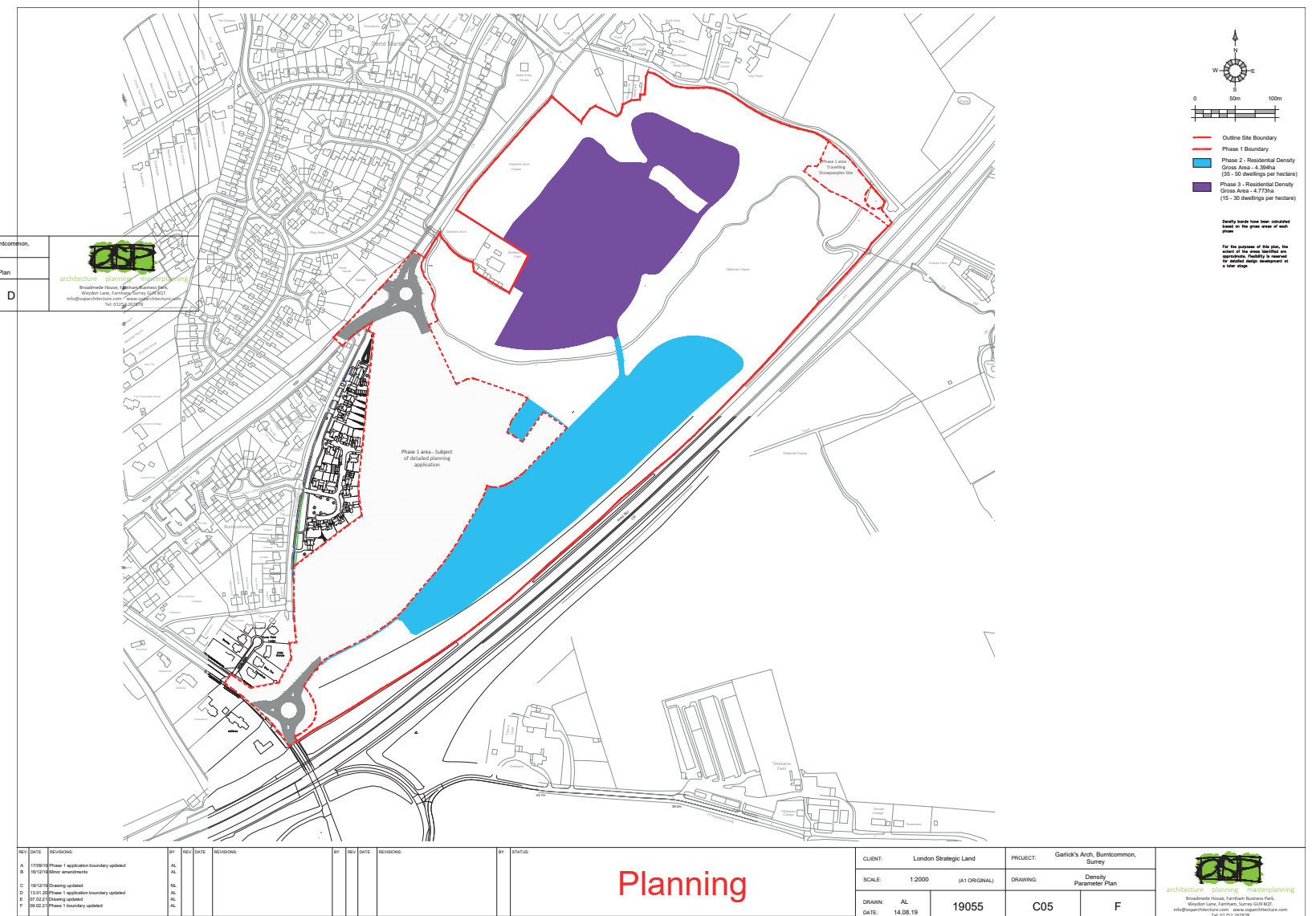


December 2019





December 2019



February 2021