



Submission by Mallard Pass Action Group (MPAG)  
– unique ID ref. 20036230

**Deadline 7:**

## **Appendix 3**

**Landscape & Visual Review of Applicant's  
comments from D4 due at D6.**

**Note: MPAG missed the Applicant's document at D6, hence our comments at D7**

27<sup>th</sup> September 2023

# MPAG comments on

## *Applicant's Response to Deadline 4 Submissions*

### *for Deadline 6 September 2023*

Including responses to *Landscape & Visual Response* 25<sup>th</sup> July 2023 (notes of / post- Issue-Specific Hearing No. 2: Environmental Matters 12<sup>th</sup> July 2023)

I was asked by MPAG to comment on landscape-related responses in the *Applicant's Response to Deadline 4 Submissions Deadline 5 September 2023*. The document was only brought to my attention a few days ago, so I have not had time to go through it in its entirety, and have focussed mainly on the responses to my July 2023 notes, so it is possible that some of my queries / concerns have been addressed in other sections.

Carly Tinkler CMLI 27<sup>th</sup> September 2023

Applicant's response to issues raised	CT comments on Applicant's response
<p>Re REP4-044, Lincolnshire County Council, ISH2 – Environmental Matters, agenda item 4, Landscape and visual effects:</p> <p>Response: '<i>at a distance of 2km and beyond the level of change to a view is <b>unlikely to result in any perceptible change</b> to the amenity of that view</i>' (my emphasis).</p>	<p>i) I fundamentally disagree with this assertion. Often, LPAs / others accept a 'tight' 2km study area boundary for large-scale schemes without realising the implications for landscapes and views over much longer distances until schemes are built.</p> <p>ii) In this case, the site is up to c. 7.5km long and c. 6km wide (note changes in my measurements in comments below); therefore, from several viewpoints beyond 2km from the main site boundary, the very extensive coverage would <b>definitely</b> result in a <i>perceptible change to the amenity of that view</i>.</p> <p>iii) The main question is, what would the levels of effects be, a) on landscape character, and b) receptors at longer-distance VPs identified by others? And if unacceptably high, could levels of visual effects be reduced to acceptable levels through mitigation?</p> <p>iv) Assessments of effects on longer-distance views should include an assessment of <b>sequential</b> visual effects (see refs to this in my May 2023 review (REP2-075) and responses, and ARA below).</p>
<p>Re Schedule 7 – Access to works: RCC: '<i>The LHA remain confused about whether this development is for 40 years as stated in some documents or whether this is a permanent development.</i>'</p>	<p>i) The emboldened section contradicts what is said elsewhere, for example the Applicant's response to the RCC at Schedule 2 – Requirement 18 (page 28), '<i>The dDCO (Rev 5) submitted at Deadline 5 has been updated to provide that decommissioning must commence no later than 60 years from the date of final commissioning</i></p>

<p>Response: <b>'The ES assessments have all assumed permanent impacts from the Proposed Development given the lack of a committed time frame and so the conclusions would apply for an over 40-year time frame'</b> (my emphasis).</p>	<p>of Work No. 1'.</p> <p>ii) In my September 2023 <i>Comments on Applicant's Response to ExA's Second Written Questions Deadline 5</i>, under the heading 'Topic 8.0 Landscape and Visual', at para. 11 which relates to Q8.0.1 (temporary vs permanent), I noted that <i>'The Applicant proposes to change its description of the proposed development from 'permanent' (the 'worst-case scenario', as assessed in the EIA), to 'semi-permanent' (60 years' duration)'</i>.</p> <p>iii) In the light of the above, the LVIA assessor reassessed levels of effects and concluded that the levels of effects reported in the LVIA should be reduced.</p> <p>iv) I disagree that levels should be reduced, for the reasons set out in my review and responses.</p> <p>v) I would also like to draw attention to the fact that in 2016, an appeal decision letter (DL) was issued relating to a proposed solar development (APP/B9506/W/15/3006387) which would have had a lifespan of thirty years. The appeal was recovered for the Secretary of State (SoS)'s determination. The Inspector recommended that the appeal be allowed, but the SoS disagreed with the Inspector's recommendation, and dismissed the appeal.</p> <p>vi) Para. 18 of the DL states, <i>'The Secretary of State takes the view that <b>30 years is a considerable period of time and the reversibility of the proposal is not a matter to which he has given any weight. He considers that a period of 30 years would not be perceived by those who frequent the area as being temporary and that the harmful effect on the landscape would prevail for far too long'</b></i> (my emphases).</p> <p>vii) Also, my September 2023 comments asked whether the proposed substation would remain in place post-decommissioning, and if so, whether the effects of that scheme element would be assessed as 'fully' permanent. I believe this was clarified in [REP4-064], [REP-065] John Hughes - ISH 1 – Scope of the Development, agenda item 3 of the Applicant's <i>Response to Deadline 4 Submissions Deadline 5</i> September 2023.</p> <p>viii) <b>However, would any other scheme elements be permanent?</b> 'Improved' access points? Tunnels under railways? Would cables be removed from eg underneath waterways, and roads? If so, have the effects of such works been assessed?</p>
<p>Re ISH 1 Scope of the Proposed Development, Need, alternatives –</p>	<p>See paras. 4 - 10 of my September 2023 <i>Comments on Applicant's Response to ExA's Second Written Questions</i></p>

<p>3i)/Any further information/ISH2 LVIA, relating to the potential future change from deer-proof to high-security fencing.</p> <p>Response:</p> <p>a) '<i>... The established network of existing and proposed hedgerows will also act as a deterrent and prevent unhindered access to the Solar PV Site.</i>'</p> <p>b) '<i>... the PV Arrays are sufficient for their security arrangements, which are commonplace for Solar Farms throughout the UK.</i>'</p> <p>c) The proposed development is '<i>...insurable. To evidence this, appended at Appendix 1 - Response from Insurance Brokers – AMI Speciality, this response is a letter from insurance brokers which confirms this is the case.</i>'</p> <p>d) '<i>... Any amendments to the details of the Proposed Development (including fencing pursuant to Requirement 8) are controlled via Requirement 5 of the dDCO... etc.</i>'</p>	<p><i>Deadline 5</i>, under the heading 'Topic 1.0: Design, parameters and other details of the Proposed Development', Q1.0.10 a – g. Relevant extracts / summaries are provided below:</p> <p>i) Re response point a): My para. 4 vi) states, '<i>some DOCOs (for example, Suffolk Constabulary) are now recommending that, 'where appropriate, security fencing systems are transparent to facilitate observation from outside the site'; <b>planting along fencelines would not allow the required transparency</b></i>'.</p> <p>ii) Re response point b): Deer-proof fencing is indeed <b>currently commonplace for Solar Farms throughout the UK</b>; the problem is that as more solar schemes are built out, the levels of crime increase, as does the recognition that far higher levels of security, including high-security fencing, are required.</p> <p>iii) Re response point c): the <i>Response From Insurance Brokers – Ami Speciality</i> doesn't change what I have said in my review and later responses.</p> <p>iv) Especially, confirmation from the British Association of Insurance Brokers (BIBA) that due mainly to Police and other parties' concerns about rising levels of often highly-organised international solar crime, at some point in the near future, it appears likely that the insurance industry will not accept deer-proof fencing around even small solar developments.</p> <p>v) Re response point d): In my opinion, it is important that the ExA is satisfied that Requirement 5 of the dDCO ensures that an application for an amendment from deer-proof to high-security fencing <b>would</b> be accompanied by <b>an assessment of landscape, visual and ecological effects</b>.</p> <p>vi) It is essential that these assessments are carried out due to the levels of landscape and visual effects arising from high-security fencing being significantly higher than those arising from deer-proof fencing, and there also being the potential for significant ecological effects (for example, resulting from lack of mammal passes).</p>
<p>Re ISH2 – Environmental Matters, agenda item 4 Landscape and visual effects, Impact on local landscape – Response (my emphases):</p> <p>i) '<i>...the assessment... assumes that <b>all effects are considered to be 'adverse'</b>... A number of the <b>embedded mitigation</b> measures including improvements to the West Glen River Corridor (para</i></p>	<p>i) a) As I have explained in my review and responses, <b>landscape and visual mitigation measures cannot be double-counted as landscape and visual enhancements</b>. See GLVIA3 para. 3.39. My comment was seeking clarification about which measures are proposed as mitigation, and which are purely enhancement.</p> <p>b) It seems unlikely that the parties will reach agreement about whether or not GLVIA3 has been interpreted correctly. Given the importance of this and</p>

<p>6.4.5), the New Permissive Paths (para 6.4.6), Calcareous Grassland Enhancements (para 6.4.7) and Woodland and Hedgerow Connections (para 6.4.8) are considered to give rise to individual <b>positive benefits on the local landscape</b>.</p> <p>ii) 'The proposed embedded <b>mitigation</b> measures... are <b>both landscape mitigation and enhancement</b> measures. In many instances, the landscape proposals are considered to be <b>multi-functional as both a mitigation and enhancement measures</b>'.</p> <p>iii) '... the assessment of residual landscape and visual effects has taken into consideration embedded mitigation...'</p> <p>iv) N/A</p> <p>v) '... the provision of wildflower grassland with calcareous species within areas currently managed for arable crops should be considered to be a landscape enhancement'.</p> <p>vi) 'There is no evidence to suggest that the proposed tussocky grassland with wildflowers nor the Wildflower grassland with calcareous species would be unsuccessful within these soil conditions as demonstrated in part by the nearby roadside verge SSSI's and Local Wildlife Sites which are cited for botanic diversity'.</p> <p>vii)– xi) Relate to effects on soils during construction and establishment of wildflower grassland, <i>inter alia</i>.</p>	<p>other disputed matters in terms of judgements and decisions, one option would be for PINS to <b>refer the matter/s to the Landscape Institute's GLVIA panel, and ask for clarification</b>.</p> <p>ii) As above.</p> <p>iii) But it has also erroneously assumed that landscape and visual mitigation measures also count as landscape and visual enhancements. As a result of this (ie balancing harm against benefit), levels of adverse effects have been reported as lower than they should have been.</p> <p>iv) N/A</p> <p>v) a) As point i) above ('<b>embedded mitigation measures [include] Calcareous Grassland Enhancements</b>').</p> <p>b) Please note the LI's statement about 'embedded', or 'designed-in' mitigation in the July 2023 consultation draft Technical Guidance Note 05/23 <i>Notes and Clarifications on aspects of GLVIA3</i>, which is as follows:</p> <p><i>'There are different points of view on whether significance should be judged before or after mitigation. Some practitioners assess at both stages, to convey the effectiveness of mitigation measures in reducing significant effects to 'not significant'. <b>The Panel emphasises that it is not helpful to do this for measures which are 'designed in' as the effects without mitigation would never arise.</b> GLVIA3 Paras. 4.21- 4.22 and IEMA guidance echo this point. Statements of significance should be reported post primary (designed-in) mitigation, and pre secondary mitigation measures which are not designed into the scheme'</i> (my emphasis).</p> <p>vi) <b>This is a very important point which requires clarification.</b> However, I have not checked to see whether it is covered in the recent ecology submissions / responses.</p> <p>a) LVIA para. 6.3.1 states that '<i>The Order limits cover approximately 852 hectares of... [predominantly] <b>arable</b> farmland</i>'.</p> <p>b) As far as I am aware, the <i>nearby roadside verge SSSI's and Local Wildlife Sites which are cited for botanic diversity</i> are not on land that was previously arable.</p> <p>c) Arable soils are high fertility.</p> <p>d) Native wildflower grassland requires low-fertility soils for successful establishment.</p> <p>e) <b>How would the fertility of the existing high-fertility arable soils be reduced in order to allow the successful establishment of wildflower grassland?</b> Would topsoil be stripped and stored /</p>
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	<p>removed from the site? If so, <b>has this been factored in / have the effects been assessed?</b></p> <p>f) LVIA para. 6.4.2 states that <i>'The embedded landscape mitigation and enhancement measures would remain for the operational phase and <b>would not be removed as part of the decommissioning stage remaining in-situ on handback to landowners'</b></i> (my emphasis).</p> <p>g) However, <b>it is not clear whether landowners / managers are required to retain the landscape mitigation and enhancement measures in situ, or whether the fields could revert to arable use.</b></p> <p>h) In fact, in my experience, applications for solar developments usually state that the land would 'revert to its former use' at decommissioning.</p> <p>i) If landowners did want to revert to arable farming, they would be faced with <b>the problem of restoring high-fertility soil.</b></p> <p>j) And if they did revert to arable farming, then <b>certain landscape / visual / ecological benefits would be lost.</b></p> <p>vii) – xi) As point vi) above. I note the assertion that <i>'The existing soil structure would be protected during the construction stages through implementation of the oSMP [REP3-019]'</i>, and trust that the detailed measures would be robust enough to avoid excessive soil damage.</p>
<p>Impacts on landscape character (construction effects):</p> <p>i) <i>'...The effects during the construction stages are considered to be short term in duration as opposed to being permanent... The magnitude of change and therefore the significance of effects are therefore generally considered to be lower during the construction stages'.</i></p> <p>ii) N/A</p> <p>iii) N/A</p> <p>iv) and v) This is in response to my comment that in the light of recent experience, including a solar development under construction at Bishampton, the two-year construction period may be over-optimistic. <i>'The Applicant notes this comment but based on</i></p>	<p>i) Re construction effects:</p> <p>a) I agree that construction effects are usually assessed as short-term (in comparison to the operational stage), and that generally, levels of construction effects (NB the use of the term 'significance' of effects in this context is incorrect, it should be 'levels') are assessed as being lower than operational effects.</p> <p>b) However, as explained in my May 2023 review (REP2-075), <b>some construction effects can be permanent</b>, for example, damage to roadside vegetation / overhanging trees along the construction route.</p> <p>ii) N/A</p> <p>iii) N/A</p> <p>iv) and v):</p> <p>a) The Applicant may well have experience in <i>delivering solar farms around the world</i>, but in the UK, I have found that contractors seem to have limited experience.</p>

<p><i>its experience in delivering solar farms around the world, considers this is a valid assumption'.</i></p>	<p>b) The Bishampton development is a case in point. In my July 2023 response, I explained that whilst the construction period was stated as being <b>three months</b>, <i>'It is now nine months since construction commenced, and not only are the works not complete, they are also now the subject of enforcement. Piling noise is one of the main problems – it can be heard over two miles away'.</i></p> <p>c) The latest update is that works are unlikely to be completed until Christmas this year at the earliest, ie <b>sixteen months' duration, over five times longer than expected.</b></p> <p>d) I have been sent summaries of informal conversations which local residents have had with the contractors. For example: <i>"I had a lovely chat with the security guard yesterday, he's from Newcastle. He told me a lot about the site: All workers flown in from Romania and housed in Birmingham. Workers trained on the job as majority of them are farmers/fruit pickers paid minimum wage. A lot of theft of copper wire, they use drones to scout the area. Panels from China. Site will be unmanned but with CCTV cameras. He said that the companies that oversee the footage tend to turn them off a lot as weather conditions continually set their alarms off. He said that the fence is useless as they keep cutting it. Site now requires 4 security guards and 2 dogs at night. It is well known in the industry that Worcestershire has the most sites either constructed or in the planning process than anywhere else because the councils always say yes. Wildlife has gone!</i></p> <p>e) Regarding piling noise, I do have audio recordings of the activity, which, if necessary, I could play at the hearing.</p>
<p>Size and Scale:</p> <p>i) <i>'The Applicant considers that the majority of people would experience the scale of the development from ground level when moving through the landscape and not from an aerial or plan view perspective... the overall scale or totality of the development would not be</i></p>	<p>i) My point was about the effects of scale on landscape character, not views and visual amenity, which in the LVIA and responses, are often conflated. Effects on character are not assessed in relation to visibility, it is not relevant to consider who can see a development and from where. Effects on character <b>are</b> assessed in relation to 'perception', or 'perceptual qualities', or 'aspects' (eg wildness, tranquillity, scenic beauty, dark skies, presence of wildlife/ birdsong), which exist regardless of whether or not anyone is there to see and</p>

<p><i>perceptible from any given viewpoint. Whilst the Proposed Development does comprise a utility scale solar PV development, it would not appear as a single or continuous block of development due to the physical and visual separation.</i></p> <p>ii) N/A</p> <p>iii) Responding to my comment that <i>'The main site measures almost 8km from west to east, and at its widest point is c. 5.5km from north to south', the response says, 'The Solar PV Site measures approximately 5.9km from north-to-south between Barbers Hill to the north farm and Essendine Road to the south. The Solar PV Site also measures approximately 6.2km from east-to-west'.</i></p>	<p>/ or experience them. If you put a nuclear power station in an isolated rural area where no one lives or ever goes to, then in theory, it would not give rise to any adverse visual effects; however, it would change the character of the landscape from rural to industrial, and in that regard would therefore give rise to adverse effects on character that could not be mitigated. If views of the power station were possible, levels of adverse visual effects – including the <b>perception</b> of the change in character - could potentially be reduced through camouflage / integration (using right colours / materials, and through good siting / design), or by screening with vegetation.</p> <p>ii) N/A</p> <p>iii) Re measurements:</p> <p>a) I agree that my measurements were not accurate – I scaled off a print of an OS map that was not quite exactly to scale. I have since checked on Google Earth.</p> <p>b) I accept that from / to the points specified, the north – south distance is c. 5.9km and not 5.5km, and that the east – west measurement is c. 6.2km.</p> <p>c) My 8km measurement was from the north-westernmost part of the main site to the south-easternmost (just north of Uffington). It is actually 7.6km.</p>
<p>LVIA / RVAA Study Area:</p> <p>i) In summary, the 2km study area boundary for the LVIA, and the 100m study area boundary for the RVAA, are acceptable / appropriate.</p> <p>ii) <i>'There is no evidence to suggest that the Proposed Development would result in any significant landscape and visual effects beyond the 2km study area... [nor] to suggest that the Proposed Development would exceed the acceptability threshold for residential properties as a private concern beyond 100m from the Proposed Development'.</i></p>	<p>i) and ii): please see my response above to REP4-044, Lincolnshire County Council, ISH2 – Environmental Matters, agenda item 4, Landscape and visual effects.</p> <p>In summary, I disagree with the Applicant's assertion that <i>'at a distance of 2km and beyond the level of change to a view is unlikely to result in any perceptible change to the amenity of that view',</i> and that the 100m RVAA study area boundary is acceptable.</p>
<p>Threshold of Significance:</p> <p>i) – iv)</p> <p>v) <i>'The Applicant disagrees that the landscape and visual effects have</i></p>	<p>i) – iv):</p> <p>a) I accept the Applicant's response given at the July hearing, that they routinely use 'Major to Moderate' as the threshold for a 'significant' effect. I would</p>



<p><i>been understated as suggested within the MPAG representation.'</i></p>	<p>simply reiterate that in my experience, it is considered usual, and best-practice, to use 'Moderate'.</p> <p>b) Also, LVIA para. 6.1.8 explains and illustrates that a five-point scale is used for significance ratings, ranging from Major to Minimal, with Moderate in the middle.</p> <p>c) Of relevance to the Applicant's decision to categorise Moderate effects as 'not significant' is note 3(5) <i>Significance: how to assess significance, where to set thresholds and how to achieve consistency</i> in the LI's draft Technical Guidance Note 05/23 <i>Notes and Clarifications on aspects of GLVIA3</i>, which states:</p> <p><i>'... typically, effects falling <b>below</b> the middle of the range of overall effect are assessed as not significant. For example, if using a scale of minor/ moderate/ major, then major effects will be significant and minor effects will not be significant. In this example, <b>moderate effects are likely to be on the borderline and may or may not be significant and justification would need to be provided in making the judgement as to whether a moderate effect is significant or not'</b> (my emphases).</i></p> <p>d) The Note goes on to say that <i>'Regarding thresholds of significance and the need for consistency, the threshold of significance should ideally be consistent across projects'</i>.</p> <p>v) My opinion remains as set out in my review and previous responses, ie that in the Applicant's LVIA, levels of landscape and visual effects have been underestimated.</p>
<p>Conflation of Landscape and Visual Effects:</p> <p>i) – iv)</p>	<p>i) – iv):</p> <p>a) In my opinion, the approach taken in the LVIA, and reiterated here, is not in accordance with GLVIA3 – see for example GLVIA3 para. 3.39.</p> <p>b) <b>This matter could also be referred to the Landscape Institute's GLVIA panel for clarification.</b></p>
<p>Mitigation as Harmful</p> <p>i) In the Applicant's LVIA, <i>'the magnitude of effects is assessed on a rating of high, medium, low and negligible... The Applicant would note that the loss of an open countryside view from a PRoW within a solar PV development is not an unusual occurrence and</i></p>	<p>i) a) As stated at para. 5.1.43 of my May 2023 review (REP2-075), the LVIA uses a three-point scale for levels of susceptibility to change, but four for value and magnitude of effect, which is odd and may skew the results. Also, in my experience, a five-point scale is much better when a more granular analysis is required, as is the case here (in fact, the LVIA uses a five-point scale for significance).</p> <p>b) I agree that <i>'the loss of an open countryside view from</i></p>

would be anticipated for virtually any NSIP or TCPA solar development as recognised in draft EN-1 at paragraph 5.10.20. Although significant effects have been identified along the PRow passing through the Solar PV Site, this scenario would be anticipated when assessing utility scale solar development. It is also noted that views from PRows are not protected in policy terms.'

- ii) 'Site specific character assessments have also been undertaken within the baseline conditions assessments LVIA to identify those features which contribute to the value of the local landscape as outlined in paragraph 6.3.72 points a – h. The Applicant notes that the MPAG representation [REP2-075] refers to 'intervisibility' with regards to landscape character assessment within this response which was previously considered to be a conflated issue within point (ii) of the previous row of this table'.
- iii) 'The Applicant considers that the interpretation of enclosure means the definition of field boundaries or visual enclosure by hedgerows depending on the specific location within the LCA...'
- iv) Re hedges being allowed to grow to 3 – 3.5m tall to screen.

a PRow within a solar PV development is not an unusual occurrence'. However, my point was that the LVIA assessed the effect of placing a screen between the receptor and the development as a benefit (in that the development would not be visible), whereas in fact, as per the LVIA's method, **the total loss of an existing view over good quality open countryside would give rise to a high level of adverse effect.**

c) **This applies to both public and private visual receptors.**

d) In the UK, some views from PRows are protected in policy terms. Perhaps this response is referring to there being 'no right to a view'; however, as visual amenity is an aspect of residential and social amenity, adverse effects on views can contribute to adverse effects on other amenity, which is a planning policy matter.

e) Draft EN-1 para. 5.10.20 does **not** say – or 'recognise', or even suggest – that '*the loss of an open countryside view from a PRow within a solar PV development is not an unusual occurrence and would be anticipated for virtually any NSIP or TCPA solar development*'. Draft EN-1 para. 5.10.20 actually says, '*The assessment should include the visibility and conspicuousness of the project during construction and of the presence and operation of the project and potential impacts on views and visual amenity. This should include light pollution effects, including on local amenity, and nature conservation*'.

ii) a) My comment related to the LVIA's lack of independent baseline landscape study. The response's reference to LVIA para. 6.3.72 a – h illustrates my point: the baseline description runs to 183 words. For a site of this very large size, and relative complexity, **that is inadequate**. The baseline character section of my own assessment runs to over 4500 words.

b) The term 'intervisibility' was not used in the context of carrying out LCAs: it related to the need to establish both interinfluence and intervisibility when carrying out granular assessments, in order to decide the most appropriate form of / approach to the design of, development.

iii) The Applicant appears to have misunderstood my point, which was about the difference between the term 'enclosed' (as used in the context of the published LCA, and which is referring to the form / characteristics of enclosure), and visual 'enclosure', which is not what the LCA is describing at that point. The LCA does note that the '**close trimmed hedges alongside large arable fields give a more open feeling to the landscape**. This is particularly so in the extreme eastern corner of the County, **between Ryhall and Essendine**' (my

	<p>emphases).</p> <p>iv) See previous point i) b) about screening resulting in total loss of previously open views. I imagine that at a later stage, details could be agreed and produced for maintenance and management on a hedge-by-hedge basis, depending on the various factors involved (landscape, visual, and ecological). I note the final point about the updated oLEMP, but recommend that residential receptors are included in discussions about proposals for hedges affecting views from private properties.</p>
Update of Photomontages	The parties remain in disagreement about the points raised / responded to (although see MPAG Assessment response iii) explaining that additional photomontages were produced).
<p>Difference between LVIA and ARA</p> <p>i) and ii), especially the assessment of sequential visual effects.</p>	<p>i) and ii):</p> <p>a) As far as I am concerned, the issues raised in Section 5.5 of my May 2023 review (REP2-075) and subsequent comments remain unresolved.</p> <p>b) For example, my review report para. 5.5.11 explains that '<i>Another problem with the ARA is that <b>it only considers effects along a single route</b>, whereas in reality, people are very likely to be travelling along a <b>series of different routes</b> – such as those described in Section 3. This means that <b>effects are likely to be experienced at multiple places and times in a single journey, perhaps continuously</b>. In my opinion, the magnitude of this effect would be <b>Large</b>' (emphases added).</i></p>
MPAG Assessment	Comments noted.
<p>Evidence Base</p> <p>i) – vii) relate to the evidence base, and consultation with people in local communities to inform the baseline studies.</p> <p>ix) '<i>The potential intra-project effects were further assessed within Chapter 16, Interactions of Effects and Summary of Cumulative Effects. As confirmed at ISH3 and stated in the document, this assessment does account for non-significant effects. In undertaking the LVIA the full scale, extent and duration of effects has been considered with regards to the relevant landscape and visual</i></p>	<p>i) – vii): My opinion remains that the LVIA's evidence base is insufficient for conclusions to be drawn about whether or not the proposed development would give rise to significant adverse effects.</p> <p>ix) I could not find any explanation in the LVIA as to how non-significant effects were considered cumulatively, nor any analysis of such effects and how they could combine to become 'significant'.</p>

*receptors to determine the significant and not significant effects'.*