

WR

Representation regarding Visual Impact Assessment in the EIA

Interested Parties Ref: **NWWFC-AFP012 and NWWFC-AFP011**

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Our representation relates to the property of [REDACTED].

We are extremely concerned that despite our submissions at consultation and pre-examination stages pointing out incorrect and misleading statements by the Applicant in their visual impact assessment on our property the Applicant has still not fairly presented the visual impact in their assessment nor proposed effective mitigating measures.

We disagree with the Applicant’s detailed descriptions, their interpretation of visual impact and their ‘Minor (not significant)’ conclusion.

With reference to the following EIA sections:

6.20.1 ES Chapter 7 - Landscape and Visual Technical Appendix 7.1

Table 2.1: Summary of Residential Visual Amenity Effects on Properties

*49	[REDACTED]	G	High	Small	Minor (not significant)
-----	------------	---	------	-------	-------------------------

*Indicates properties greater than 200m from the centreline of the Limits of Deviation

Table 3.1: Detailed Description of Effects on Residential Visual Amenity at Residential Properties

49	[REDACTED]	Three, single and two storey detached properties approximately 190m from the nearest pole located on the centreline of the Limits of Deviation at its closest point. The properties are situated	High	Small	Primary views towards the Proposed Development would be distant and oblique.
	Grouped Properties	alongside a cluster of farm buildings which create a small settlement adjacent to a minor road. These properties are located within a local hollow at the end of a small valley. The surrounding landform and strips of woodland contain most views. Distance to nearest point on the edge of the Limits of Deviation is approx. 170m - this represents the worst case scenario in terms of potential nearest proximity to the Proposed Development. Primary views are not orientated towards the Proposed Development, though [REDACTED] may experience winter views (depending on tree cover) of the Proposed Development as it passes from the ridge down the valley sides towards Hendy. College Farm (the bungalow) would experience views of the Proposed Development to the rear (six windows) and side. The proposed 132 kV Overhead Line would briefly skyline as it reached the rising land adjacent to the B4501. There is a network of existing lower voltage overhead lines to the rear of the settlement and a short section of one of these lines is on the skyline. Telegraph poles are also visible from the properties.			Minor (not significant)

Firstly, the two sections above are contradictory; the ‘Summary’ states that these are “..properties greater than 200m from the centreline of the Limits of Deviation”, whereas the ‘Detailed Description’ states that the properties are “190m from the nearest pole located on the centreline of the Limits of Deviation”. Clearly therefore the properties do lie within 200m of the centreline.

In fact both statements are inaccurate and the actual proximity is understated. The Applicant’s description also misleads on the impact of skyline views.

Proximities

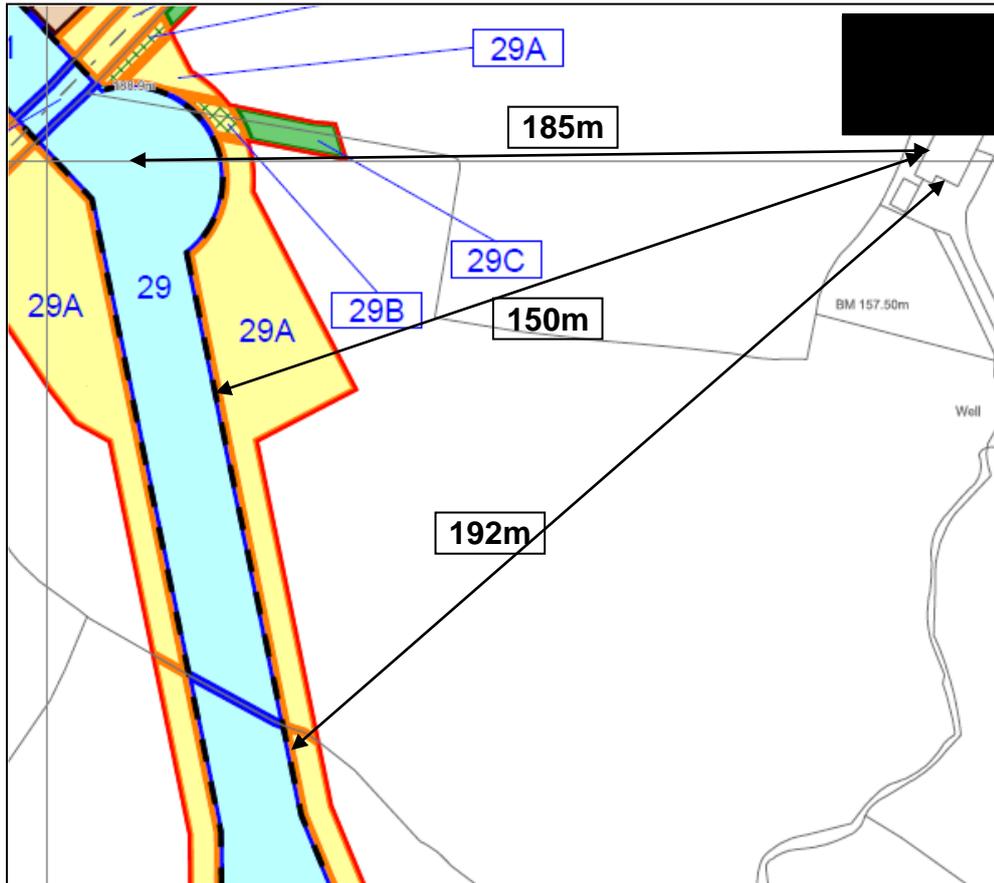
The Applicant states "Distance to nearest point on the edge of the Limits of Deviation is approx. 170m - this represents the worst case scenario in terms of potential nearest proximity to the Proposed Development."

This statement is incorrect. Actual distance to nearest point on the edge of the Limits of Deviation (worst case scenario) is approx. 150m. There are direct views from 4 windows at this distance.

We estimate 3 pylons and lines would be clearly directly visible to the west within 170m distance from centreline of limits of deviation. The applicant's claim of "greater than 200m" is not true at any point on this part of the route.

Examples of direct view distances from windows at [REDACTED]

2.2.4 Land Plans Sheet 4



Skylines

To the west towards the B4501, there are direct open skyline views of two or more pole structures from 4 windows (kitchen, dining room and bedroom), the nearest pole being 185m away. The Applicant states only that "The proposed 132 kV Overhead Line would briefly skyline as it reached the rising land adjacent to the B4501" This description grossly understates the actual effect and is misleading.

There is currently no intervening vegetation or landform screening. Tree planting proposed by the Applicant would be completely ineffective due to pylon heights on the skyline and gradient of the land up to the ridge. However putting the cable underground would be an acceptable and effective solution.

Shown below is an alternative view of one of the skylining structures in question.
Part of Viewpoint 05 (6.20.3A ES Chapter 7 Landscape and Visual Technical Appendix 7.3 Part A)



The foreground pylon in the photo will be skylined from [REDACTED]. At least one other pylon (out of camera view) in the field to right would also clearly skyline. Additionally there may possibly be a third pylon beyond that, depending on exact position and land gradient.

There is another direct skyline view to the south from [REDACTED] 2 windows (kitchen and living room) at approx 1km with no intervening screening.

We have searched but cannot find any reference to this southern skyline view from [REDACTED] in the Application and we therefore request that the Applicant addresses this omission.

The Applicant expresses concern in avoiding 'skylining' which implies acknowledgement of its harmful visual effect on the landscape, yet the descriptions in their impact assessment persistently downplay the true visual impact of skylining occurrences. We feel this practise is wholly unacceptable and misleads the Examining Authority.

We strongly disagree with the Applicant's 'Minor (not significant)' assessment and request a reappraisal. We also believe that a site inspection by the Examining Authority is justified.