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Landscape Review

*of the*  
**M3 Junction 9 Improvement**

*Prepared for*  
**South Downs National Park Authority**

*PINS Reference*  
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The first version of this Review was issued to NH on 16 March 2023.  
A revised version, 1261 R01 M3 Junction 9 Review RevA was prepared following Deadline 1 and it was issued to NH on 5 July 2023.

At the ISH on 11th July 2023 NH asked for a tracked changes version of the document.

Revision B was prepared following the ISH to take account of discussions at the Hearing. This tracked changes version shows changes between the first version of this Review and Revision B.

Figures 1-9 were attached to SDNPA's Local Impact Report (REP2-071).

Two new figures (Figure 8A and 9A) have been prepared to assist the ExA which are attached to this Revision B.

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## APPENDICES

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Prepared by LUC on behalf of the South Downs National Park Authority November 2015

# 1 Executive Summary

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## *Introduction & Background*

- 1.1 Michelle Bolger Expert Landscape Consultancy has been commissioned by the South Downs National Park Authority (SDNPA) to review the landscape and visual issues of the M3 Junction 9 Improvement project. This project involves an application by National Highways (NH) for a Development Consent Order (DCO) to enlarge Junction 9 on the M3 so that it has free-flowing links between the M3 and the A34 both northbound and southbound.
- 1.2 The proposed development includes land within the SDNP boundary and land within the setting of the SDNP, between the SDNP and the edge of Winchester<sup>1</sup>. The LVIA states that there would be 31.3ha of permanent land take for highways within the SDNP. In addition, 33.2ha of land within the SDNP would be temporarily taken during the construction period.
- 1.3 The application site is centred around the existing Junction 9 but includes sections of the M3 north and south and land around the A34 (**Figure 1**). Unless otherwise stated, this review is focused on the site as it relates to the central area around the existing junction and land north and east where the majority of works and landscape change will occur.

## *South Downs National Park*

- 1.4 The eastern and northern parts of the site are located within the South Downs National Park (SDNP) (**Figure 2**) where great weight should be given to conserving and enhancing landscape and scenic beauty. Special qualities of the SDNP include:
- Great opportunities for recreational activities and learning experiences.
  - An environment shaped by centuries of farming and embracing new enterprise.
  - Diverse, inspirational landscapes and breathtaking views. <sup>2</sup>
- 1.5 The SDNP Management Plan describes how major issues facing the Park should be addressed. Of relevance to the application is the requirement for national infrastructure schemes to take better account of protected landscapes. The SDNP Management Plan explains how there are ‘an increasing number of proposals for new national infrastructure including road

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<sup>1</sup> REP1-003 ES Chapter 7 Landscape and Visual (Rev 1) (clean) Page 35, Paragraph 7.6.2.

<sup>2</sup> South Downs National Park Management Plan 2020-2025 Figure 1.2.

*and rail schemes, pipelines and cable routes that could cut through the National Park. Solutions must be found to avoid or reduce the impact of such schemes and to achieve net gain for the environment'. Relevant outcomes and priorities within the SDNP Management Plan are set out in Section 3 of this Review.*

- 1.6 Views from St Swithun's Way across the River Itchen Valley, which will be affected by the proposed development, have been identified by the SDNP View Characterisation and Analysis as representing certain special qualities or characteristics of the South Downs where the rural character of the view and the tranquillity should be protected.

#### *Landscape Character Context*

- 1.7 The site is located within and on the side of the Itchen Valley (**Figure 3**) where there are three distinct landscape types:
- **The valley floor** alongside the River Itchen which has the greatest coverage of vegetation and includes a mosaic of woodland, pastoral fields, and flood meadows. In places, vegetation within the valley floor foreshortens views and creates a strong sense of enclosure. Elsewhere there are long views across the valley floor, enclosed and contained by the rising valley sides.
  - **The valley side** which includes parts of the existing M3 and nearby built up areas in Winchester. A transitional landscape characterised by a mixture of pastoral fields, with hedgerows and occasional tree belts.
  - **Open downland** which begins east of the M3 and the lower slopes and is characterised by large arable fields. These fields have little vegetation and consequently a strong sense of openness and exposure, with long distance views possible across the valley and the surrounding downland.
- 1.8
- 1.9 The South Downs Landscape Character Assessment, September 2020 identifies parts of three different landscape character areas (LCA) within the site (**Figure 4**):
- LCA A5 East Winchester Open Downland
  - LCA G5 Itchen Valley Sides
  - LCA F5 Itchen Floodplain

- 1.10 All three landscape character area descriptions identify:
- How the M3 and other A roads have already disrupted tranquillity within the landscape.
  - Future road expansion and upgrades, particularly the M3, as Forces for Change, with potential implications on further erosion of tranquillity.
- 1.11 Landscape sensitivities relevant to the application in relation to LCA A5 East Winchester Open Downland are:
- The intact 18th-19th century planned enclosure landscape is relatively rare within the Open Downs landscape type and is sensitive to change.
  - High recreational value due to promoted recreational routes located in close proximity to the urban population at Winchester.
  - Open views across the undeveloped Open Downs.
- 1.12 Relevant recommended land management considerations for LCA A5 East Winchester Open Downland are to:
- Prevent further fragmentation of the East Winchester Open Downs by roads and development, avoiding ribbon development encroaching on the downs from Winchester.
  - Seek opportunities to reduce the impact of visually intrusive elements such as the infrastructure and traffic associated with the M3, A272 and A31, and prominent built elements on the edge of Winchester.
- 1.13 For LCA G5 Itchen Valley Sides and LCA F5 Itchen Floodplain the relevant recommended land management considerations are to:
- Ensure that any future traffic regulation and road upgrades associated with the M3, A34 and A31 are integrated into the rural valley landscape and ensure any signage is sensitively detailed.
  - Pay particular attention to the varied nature of views throughout the area.

### ***Landscape & Visual Issues***

1.14 Based on our findings in sections 3 and 4 of this review, we consider that four key landscape and visual priorities for the SDNP are engaged by the proposed development. These are the priorities to:

- Conserve and enhance the natural beauty and character of the SDNP.
- Improve accessibility through a network of high-quality routes connecting communities with the landscape within and around the SDNP.
- Reduce the impact of visually intrusive elements such as the infrastructure and traffic associated with the M3 and A31, and prominent built elements on the edge of Winchester.
- Ensure that any future traffic regulation and road upgrades associated with the M3, A34 and A31 are integrated into the rural valley landscape.

1.15 In the summary table below, we have set out specific issues regarding the proposed development and where we feel they have the potential to fail the above priorities. We have organised these issues using the four key themes (landscape setting, water, chalk grassland, access to the SDNP) referenced in the SDNPA's representations<sup>3</sup>.

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<sup>3</sup> Letter to PINS, 7<sup>th</sup> July 2021, SDNP

Table 1: Summary of Issues and Recommendations

Summary of Issue	Recommendations	Further Information Requested
<b>Landscape Setting</b>		
<b>Issue 1: Earthworks (Figures 5 &amp; 6)</b>		
Cutting extending the motorway infrastructure into the SDNP. Loss of characteristic downland topography through spoil and re-profiling works.	Existing flowing downland topography east of the M3 is conserved as much as possible and any filling of deposition material is sympathetic to distinctive downland topography.	<ul style="list-style-type: none"> <li>• Shaded relief plan for the proposed final contours</li> </ul>
<b>Issue 2: Vegetation clearance (Figure 8)</b>		
<p>Approximately nine hectares of vegetation is proposed to be removed. Loss of trees along the eastern side of the M3 will open up views of the existing motorway, proposed new roads and increased activity from the east and from the west including from St Swithun's Way on the boundary of the SDNP (SDNP Representative View 62)<sup>4</sup>.</p> <p>It will also open up views towards built up parts of Winchester from the SDNP.</p>	Advanced planting is undertaken to minimise the opening up of views as much as possible.	<ul style="list-style-type: none"> <li>• Plan showing the location of the advanced planting, with an explanation for its rationale.</li> <li>• New photomontages from Viewpoints 3 &amp; 7 that accurately show the vegetation to be removed.</li> </ul>

<sup>4</sup> South Downs National Park: View Characterisation and Analysis, Page 13



Issue 3: Proposed vegetation (Figure 9)		
<p>Proposed tree planting alongside eastern edge of the M3 is unlikely to be sufficient to provide a robust level of screening of the road infrastructure and activity, particularly in the short term, for people within the SDNP.</p>	<p>Tree planting along the eastern edge of the motorway is no less than 25m in width and at least half of this planting occurs on top of the cut batter where it will be more elevated and will provide more effective screening.</p>	<p>n/a</p>
<p>Proposals for planting / vegetation management within land between the A34 and M3 are not adequate to mitigate impacts on the valley landscape and amenity of PRoW users.</p>	<p>Utilise this area to accommodate more tree planting which would help mitigate the visual impact of the proposals on people using the PRoWs within the Itchen Valley.</p>	
	<p>Additional tree planting would encroach on proposed chalk grassland. This would require an extension of the chalk grassland. (See Issue 7 below).</p>	

Issue 4: Tranquillity		
NH acknowledge that the proposals will have a significant adverse impact on the sense of tranquillity within the SDNP.	NH works with the SDNPA to explore opportunities to enhance tranquillity within the SDNP.	n/a
Issue 5: Construction compound		
Construction compound east of the gyratory will protrude into the SDNP and exacerbate the impact of the proposed works on the SDNP.	<p>The existing Badgers Farm Compound is used instead of the compound east of the gyratory.</p> <p>If the compound east of the gyratory cannot be relocated outside of the SDNP, then bulky / prominent items such as the plant storage and welfare units should be located elsewhere within the main corridor of works or at Badgers Farm, not in the compound within the SDNP.</p>	Review suitability of the Badgers Farm Compound.
<b>Water</b>		
Issue 6: Proposed swale and attenuation pond ( <b>Figure 9</b> )		
The swale and pond east of the M3 will be incongruous within the chalk downland landscape which is otherwise characterised by large open arable fields over rolling downs and dry valley systems.	Further information should be provided by NH explaining the detailed design of the attenuation feature and swale, and the measures taken to ensure that any potential environmental benefits of these features have been maximised.	<ul style="list-style-type: none"> <li>• Provide information as per our recommendations.</li> </ul>

<b>Chalk Grassland</b>		
<b>Issue 7: Chalk grassland &amp; farmland interface (Figure 9)</b>		
Proposals for chalk grassland within the landscape east of the M3 will establish a new sub division within the open downland. It is unclear how the chalk grassland will be protected from agricultural activities and management practices which might erode the chalk grassland.	Fields east of the M3 should be treated as one, and all reverted to chalk grassland.	n/a
<b>Issue 8: Chalk grassland on embankments and areas of fill material (Figure 9)</b>		
The chalk grassland on cut batters is likely to be difficult to access and manage to achieve the establishment and long-term success of chalk grassland that is species rich. This is due to the woodland and scrub proposed for the higher parts of the slope, the fragmentation of the areas of proposed chalk grassland and the location/gradients which will make scrub management difficult.	Review and extend the proposed woodland and chalk grassland planting. (See Issue 9 below).	

<b>Access to the South Downs National Park</b>		
<b>Issue 9: Proposed PRow upgrades (Figure 7)</b>		
<p>Upgrades are supported in principle because they would contribute to the SDNP priority of improving accessibility with the landscape within and around the SDNP.</p> <p>However, alignment of the proposed bridleway between Easton Lane and Long Walk is arbitrary and does not take the optimum route in landscape or visual amenity terms.</p> <p>The proposed PRow alongside the A33 and A34 are very close to the proposed carriageways and as such are unlikely to be attractive routes.</p>	<p>Realign the bridleway further east of the M3 or provide an alternative walking route further up the slope away from the motorway, where views are more extensive and the impact of passing vehicles on the amenity of the route is expected to be reduced.</p> <p>Provide further details on design measures taken to ensure routes alongside the A33 and A34 are attractive, through measures such as bunds between the walking and cycling route as well as replacement tree planting to provide additional cover and relief from the surrounding highway proposals.</p>	<ul style="list-style-type: none"> <li>• Provide plan showing proposed PRow diversions during the construction phases.</li> <li>• Provide information as per our recommendations.</li> </ul>

Issue 10: Proposed subways (Figure 7)		
<p>The existing subways are unattractive due to their narrow width and low height, and therefore design of new subways should seek to improve on this experience.</p> <p>The combined width of highways structures crossing the River Itchen will increase with the proposed 3.5m wide footbridge alongside the A34 northbound. This is expected to have an adverse impact on the Itchen Way which runs alongside the River Itchen and beneath the A34.</p> <p>Concern that the subways are not sufficiently wide to accommodate the proposed equestrian use.</p>	<p>Provide further details on the specific design measures taken to maximise the sense of spaciousness and the actual and perceived sense of safety within the subways including the route alongside the River Itchen.</p>	<ul style="list-style-type: none"> <li>• Confirm whether the proposed subways will have segregated or unsegregated foot / cycle routes.</li> <li>• Confirm that the subways are of sufficient width where equestrian use is proposed.</li> <li>• Provide explanation of design measures for safety with reference to use of lighting, materiality etc.</li> <li>• Provide details of relationship between the works and Itchen Way including any opportunities taken for enhancement of this route.</li> </ul>

### *Comments on Submitted LVIA*

- 1.16 We agree with the LVIA, that the SDNP has very high sensitivity to the changes proposed. We also agree that the proposals would result in significant adverse effects on the landscape of the SDNP during construction and Year 1 of operation.
- 1.17 We disagree with the LVIA where it finds that landscape effects on the SDNP would no longer be significant at Year 15. There is no narrative text to support the assessment in *Table 7.27: Operation phase non-significant landscape effects - summer year 15* that the magnitude of change on the SDNP and on the affected SDNP LCAs at summer year 15 is ‘negligible.’<sup>5</sup> The LVIA states that ‘*The effects reduce to a slight adverse and not significant effect in the long term as landscape mitigation planting successfully establishes to aid landscape integration and provide visual screening.*’<sup>6</sup> This is a statement not an explanation and omits the fact that the assessment only refers to summer at year 15.
- 1.18 There is no explanation as to how the incursion and expansion of the motorway landscape into the SDNP, which will result in the erosion of intrinsic characteristics such as the downland topography and the loss of trees that cannot be replaced, could be reduced to negligible. We consider there would be a significant residual and permanent adverse effect on the SDNP. The failure to assess landscape and visual effects for winter at year 15 has also resulted in an underestimation of the effects. Winter effects are as important as summer effects as they last for about half the year and there is no justification for excluding them.
- 1.19 The effects have been underestimated in the LVIA chapter and they are also underestimated in the accompanying visualisations submitted by NH which form part of that assessment. The visualisations fail to accurately show the loss of vegetation. We identified that this was the case for Vp 14 and the revised Vp 14 submitted at Deadline 1 (REP1-010<sup>7</sup>) has confirmed that the tree removal had not been shown. We have now reviewed the other visualisations and there is a more significant failure to show tree loss from Vp 3 and Vp 7. NH have said that they are reviewing the visualisations and will submit new visualisations for Deadline 3.

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<sup>5</sup> REP1-003 ES Chapter 7 Landscape and Visual (Rev 1) (clean) Page 40

<sup>6</sup> REP1-003 ES Chapter 7 Landscape and Visual (Rev 1) (clean) Page 55 paragraph 7.11.15

<sup>7</sup> Deadline 1 Submission - 6.2 Environmental Statement - Chapter 7: Landscape and Visual - Figure 7.14 - Rev 1

- 1.20 In addition to the failure to show tree removal the visualisations do not show the full impact of the proposed works. For example, the slip road in Vp 14 has the appearance of a cycle path rather than a major element of a motorway with all the attendant road markings, signage, traffic etc..
- 1.21 The LVIA identifies that Vp 3 has have been identified by the SDNPA as being a representative view, illustrative of the diverse, inspirational landscapes of the South Downs, and considers that the Vp has Very High Sensitivity. However, all viewpoints within the SDNP are considered to have Very High Sensitivity. There is no consideration within the narrative description of effects (APP-100 6.3 Environmental Statement - Appendix 7.4: Schedule of Visual Effects pages 7 & 8) of whether changes to a view identified as representative by the SDNPA viewpoint may be of greater significance, especially as this is not a single viewpoint but represents views from a significant stretch of St Swithun's Way.
- 1.22 The SDNPA disagrees with the conclusion with regard to the effects from Vp 3, that at year 15 the magnitude of change would be negligible. Trees to be removed cannot be fully mitigated and traffic on the new sections of slip road are likely to be visible from St Swithun's Way.

## 2 Introduction

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### *Introduction*

- 2.1 Michelle Bolger Expert Landscape Consultancy has been commissioned by the South Downs National Park Authority (SDNPA) to review the landscape and visual issues of the M3 Junction 9 Improvement project. This project involves an application by National Highways (NH) for a Development Consent Order (DCO) to change Junction 9 on the M3 so that it has free-flowing links between the M3 and the A34 both northbound and southbound.
- 2.2 NH's LVIA states that the proposed development includes approximately 72 hectares (ha) of land within the SDNP boundary and 42 ha within the setting of the SDNP, between the SDNP and the edge of Winchester<sup>8</sup>. The LVIA states that within the SDNP, 31.3ha would be permanent land take outside of the existing highways estate, and 33.2ha would be temporary land take. It is noted that SDNPA have identified discrepancies between application documents regarding the total area of the scheme and are in the process of seeking clarification and confirmation from NH of these areas.
- 2.3 The application site is centred around the existing Junction 9 but includes sections of the M3 north and south and land around the A34 (**Figure 1**). Unless otherwise stated, this review is focused on the site as it relates to the central area around the existing junction and land north and east where the majority of works and landscape change will occur. It is concerned with the effects of the development on land within the South Downs National Park (SDNP).
- 2.4 The application is accompanied by an Environmental Statement (ES). ES Chapter 7 relates to landscape and visual impacts and was prepared by Stantec, referred to hereafter as the LVIA. Figures we have prepared to supplement those within the ES are included as **Appendix 1** to this report. For ease of reference, relevant figures from the ES are referenced within this report with the suffix ES.

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<sup>8</sup> REP1-003 ES Chapter 7 Landscape and Visual (Rev 1) (clean) Page 35, Paragraph 7.6.2.



2.5 This review considers:

- Relevant landscape and visual issues identified in the SDNP Management Plan.
- The existing landscape character context.
- Landscape and visual issues stemming from the proposed changes and how these impact on the character of the SDNP and / or affect issues relevant to the SDNP.
- Recommendations as to how impacts might be avoided, minimised, or mitigated.

2.6 This review has been prepared by Chartered Members of the Landscape Institute in accordance with the principles established by Guidelines for Landscape and Visual Impact Assessment, Third Edition, 2013 (GLVIA3). On the 21<sup>st</sup> of February 2023, the authors visited the site and the surrounding area. A second visit was undertaken in June 2023.

### 3 South Downs National Park

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3.1 The eastern and northern parts of the site are located within the SDNP (**Figure 2**). The NPPF explains that ‘*great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues*’<sup>9</sup>. Special qualities of the SDNP are<sup>10</sup>:

- Distinctive towns and villages, and communities with real pride in their area.
- Great opportunities for recreational activities and learning experiences.
- Well-conserved historical features and a rich cultural heritage.
- Tranquil and unspoilt places.
- A rich variety of wildlife and habitats including rare and internationally important species.
- An environment shaped by centuries of farming and embracing new enterprise.
- Diverse, inspirational landscapes and breathtaking views.

3.2 The South Downs National Park Management Plan 2020-2025 (SDNP Management Plan) describes how major issues facing the Park should be addressed. These include new housing and infrastructure. Of particular relevance to the application is the following:

***National infrastructure schemes must take far better account of protected landscapes: There are an increasing number of proposals for new national infrastructure including road and rail schemes, pipelines and cable routes that could cut through the National Park. Solutions must be found to avoid or reduce the impact of such schemes and to achieve net gain for the environment.***

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<sup>9</sup> NPPF Paragraph 176.

<sup>10</sup> South Downs National Park Management Plan 2020-2025 Figure 1.2.

3.3 A number of specific outcomes and priorities are set out in the SDNP Management Plan. Those most relevant to the application are:

3.4 **Outcome 1: landscape & natural beauty. For this outcome the priorities include:**

- **Priority 1.1 protect landscape character.** To protect and enhance the natural beauty and character of the SDNP and seek environmental net-gain from any infrastructure projects.
- **Priority 1.2 create green infrastructure.** To improve green and blue infrastructure to deliver nature recovery networks and connect people to nature within and around the SDNP.

3.5 **Outcome 5: outstanding experiences. For this outcome the priorities include:**

- **Priority 5.2 Improve Accessibility.** To improve accessibility through a network of high quality routes connecting communities with the landscape, heritage, attractions and transport hubs and gateways.
- **Priority 5.3 Encourage Sustainable Transport.** To encourage sustainable access into and around the SDNP, encouraging the retention and expansion of rural transport services.

#### ***View Characterisation and Analysis***

3.6 The SDNPA commissioned a View Characterisation and Analysis study in 2015. It identifies view types which are *'Extensive and/or repeating views that may represent certain special qualities or characteristics of the South Downs, or represent sequential views from routes.'*<sup>11</sup> Within these views types a number of representative views are identified and a subgroup of these have been photographed as monitoring points. Extracts from the study are included at Appendix 2.

3.7 One of the view types is *'Views associated with chalk river valleys'*<sup>12</sup>. One of the representative views is Vp 62 Itchen Valley from St Swithun's Way which is described as follows: *'This view illustrates the water meadows in the Itchen Valley - illustrating the diverse, inspirational landscapes of the South Downs. It also shows the countryside/urban interface along SDNP boundary at Winchester.'*<sup>13</sup> Vp 62, which is used to illustrate the view type, is taken from close to LVIA Vp 3. The scheme proposals would be clearly visible from Vp 62.

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<sup>11</sup> SDNP View Characterisation and Analysis Page 3

<sup>12</sup> SDNP View Characterisation and Analysis Page 34

<sup>13</sup> SDNP View Characterisation and Analysis Page 13

3.8 Threats to the view type include ‘*development that impacts on the tranquillity of the valleys*’.

3.9 The Aim and Management Guidance<sup>14</sup> for this view type include:

- Maintain the pastoral nature of the valley floors and sense of tranquillity associated with the valleys.
- Ensure any new development is well integrated in terms of scale, form and materials.
- Protect the rural character of the valleys, limiting encroachment of suburban influences into views.

### **Summary**

3.10 Special qualities of the SDNP include diverse, inspirational landscapes and breath-taking views, and great opportunities for recreational activities. Relevant priorities for development within the SDNP include the protection and enhancement of the natural beauty and character of the SDNP, environmental net-gains from infrastructure projects, and the improvement of accessibility.

3.11 Views from St Swithun’s Way across the River Itchen Valley, which will be affected by the proposed development, have been identified by the SDNP **View Characterisation and Analysis** as representing certain special qualities or characteristics of the South Downs where the rural character of the view and the tranquillity should be protected.

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<sup>14</sup> SDNP View Characterisation and Analysis Page 35

## 4 Landscape Character Context

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### *Introduction*

- 4.1 The site is located within and adjacent to the Itchen Valley (**Figure 3**) where there are three distinct landscape types:
- The valley floor alongside the River Itchen.
  - The valley side which includes parts of the existing M3 and nearby built up areas in Winchester.
  - Open downland which begins east of the M3.
- 4.2 There are obvious changes in character between the valley floor, the valley sides, and the open downland. The valley floor has the greatest coverage of vegetation and includes a mosaic of woodland, pastoral fields, and flood meadows. Vegetation within the valley floor foreshortens views and creates a strong sense of enclosure. This quality is appreciated from the Itchen Way/ Three Castles Path Promoted Routes which run along the edge of the valley floor crossing the Itchen beneath the A34 roads. In other parts, such as from St Swithun's Way there is an '*Extensive open valley floor, with long views, enclosed and contained by the rising valley sides. Tree and woodland cover frequently mark the edge of the floodplain where contours begin to rise.*'<sup>15</sup>
- 4.3 The lower valley sides, a transitional landscape between the valley floor and the open downland, are characterised by a mixture of pastoral fields, with hedgerows and occasional tree belts. Around the site, it is the lower valley sides which have experienced the greatest disruption from existing highways development and the large industrial estate.
- 4.4 East of the lower slopes is the open downland which is characterised by large arable fields. Due to the scale and openness of the fields, there is a strong sense of openness and exposure. There is little vegetation and long-distance views across the valley and the surrounding downland are possible. The only public right of way in this part of the site is a bridleway which connects between Easton Lane and a series of underpasses beneath Junction 9 which in turn connect with Winchester. This route is part of National Cycle Network Route 23 (Reading to Southampton) and, locally, is an important link / departure point between Winchester and the SDNP.

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<sup>15</sup> South Downs: Landscape Character Assessment September 2020 Appendix F F-1

### *South Downs Landscape Character Assessment, September 2020*

4.5 Changes in landscape character described above are reflected in the South Downs Landscape Character Assessment, September 2020 which identifies parts of three different landscape character areas (LCA) within the site (**Figure 4**). These LCAs are:

- LCA A5 East Winchester Open Downland
- LCA G5 Itchen Valley Sides
- LCA F5 Itchen Floodplain

#### *LCA A5 East Winchester Open Downland*

4.6 This LCA covers the most land within the site. It includes land immediately east of the M3 and a large parcel of land within the site between the M3 and Winnall Cottage Farm. The LCA exhibits chalk scenery which is typical of an open download landscape type<sup>16</sup>. It is dominated by large fields which reflect 18-19<sup>th</sup> century planned enclosure that was probably once open downland<sup>17</sup>. Relevant key characteristics include:

- *Open rolling upland chalk landscape of rolling downs reaching 176m at Cheesefoot Head.*
- *Furrowed by extensive branching dry valley systems which produce deep, narrow, rounded coombs - for example at Chilcomb and the Devil's Punchbowl.*
- *Dominated by large 18th and 19th century fields of arable and pasture, bounded by sparse thorn hedgerows creating a very open landscape supporting a range of farmland birds.*
- *Hedgerows and tracks surviving from the earlier manorial downland landscape are important historic landscape features.*
- *Occasional areas of species rich unimproved chalk grassland occur, for example at Cheesefoot Head and St Catherine's Hill, Magdalene Hill and Matterley Bowl.*
- *Occasional scrub and woodland on steeper slopes, and game coverts, linear tree features and beech clumps on hill tops (notably at Cheesefoot Head and Deacon Hill) contribute to biodiversity and provide visual texture in the landscape.*

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<sup>16</sup> South Downs: Landscape Character Assessment September 2020 Appendix A - A-24

<sup>17</sup> South Downs: Landscape Character Assessment September 2020 Appendix A - A-25

- *Large open skies ensure that weather conditions are a dominant influence creating a dynamic, moody landscape, particularly on higher ground e.g. at Cheesefoot Head.*
- *A strong sense of remoteness and tranquillity away from the major transport routes (M3, A31, A272) which cross the landscape.*
- *The typical settlement form is relatively late in origin and comprises isolated farmsteads of 18th-19th century with more modern buildings along the B3404 on the edge of Winchester.*
- *Expansive views over Winchester and the Itchen Valley due to the open character of the landscape, including panoramic views from Cheesefoot Head and from St Catherine's Hill.*

4.7 Transport routes within LCA A5 are said to ‘*cause severance within the area - the M3 runs along the western boundary and the A31/A272 cut across the character area in an east-west direction. The sense of tranquillity and remoteness of this character area is diminished in the vicinity of these major transport routes. Also associated with the major transport routes out of Winchester is ribbon development, as seen along the B3404 and peripheral development encroaching the edge of the National Park from the eastern edge of the city*’<sup>18</sup>.

4.8 The description of the LCA goes on to state that the location of this area close to Winchester and the proximity of the M3, A31 and A272 ‘*makes it potentially accessible to a large number of users. However, these same roads are barriers to movement on foot/ horseback into the National Park. There is a relatively sparse network of public rights of way, and opportunities for circular walks from Winchester are limited.*’<sup>19</sup>.

4.9 Relevant key landscape sensitivities identified for LCA A5 are:

- The intact 18th-19th century planned enclosure landscape is relatively rare within the Open Downs landscape type and is sensitive to change.
- High recreational value due to promoted recreational routes located in close proximity to the urban population at Winchester.
- Open views across the undeveloped Open Downs.

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<sup>18</sup> South Downs: Landscape Character Assessment September 2020 Appendix A – A-25

<sup>19</sup> South Downs: Landscape Character Assessment September 2020 Appendix A – A-25

4.10 Relevant forces for change identified for LCA A5 are:

- Pressure for change on the urban edge of Winchester encroaching into the *Open Downland* which could dilute rural character on the edge of the SDNP.
- Infrastructure upgrades to major roads which cross or skirt the character area eroding tranquillity, e.g. improvements to Junction 9 of the M3, which adjoins the western boundary of the area.
- Increasing recreational pressure on the sparse public rights of way network due to the proximity of the urban population in Winchester. The severance caused by the M3 concentrating recreational use in the highly sensitive areas of St Catherine's Hill SSSI and along the River Itchen
- Changes in agricultural management eroding historic field patterns or the setting for historic features.

4.11 Relevant land management considerations identified for LCA A5 are:

- Prevent further fragmentation of the East Winchester Open Downs by roads and development, avoiding ribbon development encroaching on the downs from Winchester.
- Seek opportunities to reduce the impact of visually intrusive elements such as the infrastructure and traffic associated with the M3, A272 and A31, and prominent built elements on the edge of Winchester.

***LCA G5 Itchen Valley Sides***

4.12 This LCA includes land within the site immediately east of the M3 and between the M3 and the A34. The boundaries of the LCA are defined by topography with the lower boundary drawn along the edge of the floodplain and the upper boundary drawn roughly along the apparent skyline of the valley sides as seen from the valley floor<sup>20</sup>. Relevant key characteristics include:

- *Smoothly rounded valley sides carved from chalk, generally less steep than the valley sides of the major chalk valleys in east of the National Park.*

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<sup>20</sup> South Downs: Landscape Character Assessment September 2020 Appendix G – G-17



- *Field patterns are a mixture of informal fieldscapes resulting from piecemeal enclosure and formal fieldscapes resulting from planned enclosure - the smaller fields are around settlements.*
- *Crossed by the M3 and A roads which interrupt the otherwise tranquil valley landscape.*

4.13 The description of LCA G5 states that *'although the valley has an overall tranquil quality this is disrupted in place by the audible 'hum' of traffic. The character area is crossed in two locations by the M3 and in several places by A roads'. 'The Itchen Valley Way allows public access all along the valley and to places of interest'*<sup>21</sup>.

4.14 Relevant key landscape sensitivities identified for LCA G5 are:

- The panoramic views over the valley from St Catherine's Hill also increase the sensitivity of the valley to change.

4.15 Relevant forces for change identified for LCA G5 are:

- Continued road upgrades and expansions.

4.16 Relevant land management considerations identified for LCA G5 are:

- Ensure that any future traffic regulation and road upgrades associated with the M3, A34 and A31 are integrated into the rural valley landscape and ensure any signage is sensitively detailed.

#### ***LCA F5 Itchen Floodplain***

4.17 This LCA includes land within the floodplain of the River Itchen which includes the section of site where the A34 crosses the River Itchen. Relevant key characteristics include:

- *Flat valley floor of the Itchen Valley that flows through and provides a landscape setting for Winchester.*
- *A landscape with flat landform and predominantly pastoral.*
- *Contains the meandering course of the River Itchen.*
- *The watercourse and banks of the Itchen are designated as a SAC incorporating a diversity of habitats including the clear alkaline river, fen/marsh/swamp, neutral grassland and pockets of woodland.*

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<sup>21</sup> South Downs: Landscape Character Assessment September 2020 Appendix G – G-17

- *Historic features associated with the presence of the River and the Itchen Navigation are apparent today. Remnant features relating to water management and agricultural/industrial use of the river, including fragments of watermeadows, weirs and mill ponds, fish farms, trout lakes, and watercress beds.*
- *General absence of settlement, but the area is close to Winchester and crossed by the M3 and A roads which interrupt the otherwise tranquil landscape.*

4.18 Relevant key landscape sensitivities identified for LCA F5 are:

- The panoramic viewpoints over the valley from St Catherine's Hill which increases the sensitivity of the floodplain landscape.

4.19 Relevant forces for change identified for LCA F5 are:

- Future road expansion and upgrades of M3, A34 and A31 further affecting the tranquillity of the floodplain.

4.20 Relevant land management considerations identified for LCA F5 are:

- Ensure that any future traffic regulation and road upgrades associated with the M3, A34 and A31 are integrated into the rural valley landscape and ensure any signage is sensitively detailed.
- Pay particular attention to the varied nature of views throughout the area.
- Avoid development extending into the floodplain. Minimise light spill from settlements and individual buildings.

### Summary

- 4.21 The site is located within and on the side of the Itchen Valley (**Figure 3**) where there are three distinct landscape types:
- **The valley floor** alongside the River Itchen which has the greatest coverage of vegetation and includes a mosaic of woodland, pastoral fields, and flood meadows. In places vegetation within the valley floor foreshortens views and creates a strong sense of enclosure. Elsewhere there are long views across the valley floor, enclosed and contained by the rising valley sides.
  - **The valley side** which includes parts of the existing M3 and nearby built up areas in Winchester. A transitional landscape characterised by a mixture of pastoral fields, with hedgerows and occasional tree belts. Around the site, it is the lower valley sides which have experienced the greatest disruption from highways development.
  - **Open downland** which begins east of the M3 and the lower slopes which is characterised by large arable fields. These fields have little vegetation and consequently a strong sense of openness and exposure, with long distance views possible across the valley and the surrounding downland.
- 4.22 Around the site, it is the lower valley sides which have experienced the greatest disruption from highways development.
- 4.23 The South Downs Landscape Character Assessment, September 2020 identifies parts of three different landscape character areas (LCA) within the site (**Figure 4**):
- LCA A5 East Winchester Open Downland
  - LCA G5 Itchen Valley Sides
  - LCA F5 Itchen Floodplain
- 4.24 All three landscape character area descriptions identify:
- How the M3 and other A roads have already disrupted tranquillity within the landscape.
  - Future road expansion and upgrades, particularly the M3, as Forces for Change, with potential implications on further erosion of tranquillity.
- 4.25 Landscape sensitivities relevant to the application in relation to LCA A5 East Winchester Open Downland are:

- The intact 18th-19th century planned enclosure landscape is relatively rare within the Open Downs landscape type and is sensitive to change.
- High recreational value due to promoted recreational routes located in close proximity to the urban population at Winchester.
- Open views across the undeveloped Open Downs.

4.26 Relevant recommended land management considerations for LCA A5 East Winchester Open Downland are to:

- Prevent further fragmentation of the East Winchester Open Downs by roads and development, avoiding ribbon development encroaching on the downs from Winchester.
- Seek opportunities to reduce the impact of visually intrusive elements such as the infrastructure and traffic associated with the M3, A272 and A31, and prominent built elements on the edge of Winchester.

4.27 For LCA G5 Itchen Valley Sides and LCA F5 Itchen Floodplain the relevant recommended land management considerations are to:

- Ensure that any future traffic regulation and road upgrades associated with the M3, A34 and A31 are integrated into the rural valley landscape and ensure any signage is sensitively detailed.
- Pay particular attention to the varied nature of views throughout the area.  
Landscape and Visual Issues.

## 5 Landscape & Visual Issues

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- 5.1 The proposed development includes approximately 72 hectares of land within the SDNP boundary, plus 42 ha within the setting of the SDNP, between the SDNP and the edge of Winchester. Within the SDNP, there would be 31.3ha of permanent land take for highways within the SDNP. In addition, 33.2ha of land within the SDNP would be temporarily taken during the construction period.
- 5.2 Based on our findings in sections 3 and 4 of this review, we consider that four key landscape and visual priorities for the SDNP are engaged by the proposed development. These are the priorities to:
- Conserve and enhance the natural beauty and character of the SDNP.
  - Improve accessibility through a network of high-quality routes connecting communities with the landscape within and around the SDNP.
  - Reduce the impact of visually intrusive elements such as the infrastructure and traffic associated with the M3 and A31, and prominent built elements on the edge of Winchester.
  - Ensure that any future traffic regulation and road upgrades associated with the M3, A34 and A31 are integrated into the rural valley landscape.
- 5.3 In the following sections we have set out specific issues regarding the proposed development and where we feel they have the potential to fail the above priorities. We have organised these issues using the four key themes referenced in SDNPA's representations<sup>22</sup>. These issues carry equal weight in terms of the need to mitigate and compensate for the direct impacts of this Scheme on the special qualities of the SDNP. They should be used as the guiding framework for the proposed development.
1. Landscape setting
  2. Water
  3. Chalk grassland
  4. Access to the National Park.

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<sup>22</sup> Letter to PINS, 7<sup>th</sup> July 2021, SDNP

## 6 Landscape Setting (Issues 1-5)

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### *Issue 1: Earthworks*

- 6.1 Of greatest importance to this review are the proposals to cut into the chalk downland landscape east of the existing M3 in order to accommodate a new southbound off ramp and A34 connection (**Figure 5**). This cutting would extend the motorway infrastructure further east into the SDNP. Rather than integrating the road upgrades into the valley landscape, the upgrades would extend the footprint of the highways network by cutting into the open downland.
- 6.2 In total approximately 384,800m<sup>3</sup> of excavated material would be excavated during the construction phase.<sup>23</sup> The excess spoil would be deposited throughout the fields east of the M3 with the largest amount being deposited in two existing natural depressions or dry valleys in the downland (see NH's drawings for the Finished Level Variance from Existing Levels) (**Figure 6**). These existing topographical features are characteristic of the local landscape and their loss would significantly harm the legibility of the gently rolling or flowing downland topography. In this regard the proposals would not conserve nor enhance the natural beauty and character of the SDNP. Changes in topography would be most noticeable in the landscape around Easton Lane where, as shown in NH's photomontage from viewpoint 1, a significant change in the ground level would be apparent. For people using this lane it would be apparent that the level of the landscape had been raised over a large area.
- 6.3 Following our meeting with NH on 1<sup>st</sup> March 2023, NH provided some long sections through the fields east of the M3 in order to help our understanding of the proposals for cutting and filling in this area. These long sections are helpful in understanding the degree of change that will be experienced in this area and the loss of the existing natural profile of the landscape.
- 6.4 In addition to the long section, we also requested a shaded relief plan to show a comparison between the existing topography and the proposed topography. Currently, the proposed contours are only shown on the Environmental Masterplan (EM) (**Figure 9**) and due to the

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<sup>23</sup> APP-043 6.1 Environmental Statement Chapter 2 The Scheme and its Surroundings, Page 19

amount of information on the EM, they are difficult to read. A shaded relief plan will be the easiest way for the Examining Authority to understand the proposed changes in level and should be provided by NH.

- 6.5 As a design principle, we recommend that the existing flowing downland topography east of the M3 is conserved as much as possible and that any filling of deposition material is done so in a manner which is sympathetic to this distinctive landform.

***Issue 2: Vegetation clearance***

- 6.6 Drawings within NH's Arboricultural survey show the extent of vegetation which is proposed to be removed<sup>24</sup> (see red shading on **Figure 8**). These drawings show that the greatest extent of removal will occur in the landscape immediately around the existing gyratory and the landscape north of the gyratory and east of the M3 in which the bulk of the highways works are proposed. When measuring from our Figure 8, approximately nine hectares of vegetation is proposed to be removed. Virtually all existing vegetation alongside the M3 corridor will be removed. Trees along the eastern edge of the M3 currently soften the interface between the motorway and the SDNP and are relatively successful in minimising the visual impact of the motorway on the wider SDNP.
- 6.7 The tree removal includes a block of distinctive trees, including some coniferous trees which are not part of the embankment planting for the original M3 but relate to the historic field boundaries that were in place prior to the original construction of the motorway. It is identified as Tree Groups G9 and G10<sup>25</sup> on Figures 8A to this Review. It currently sits in land between the M3 and the A34. The development proposals are for four separate sections of roads in this area and a roundabout. It will not be possible to replant in this area.
- 6.8 The loss of these trees would open up views of the motorway corridor, and the new infrastructure and increased activity within it. This will be particularly noticeable from St Swithun's Way in views across the valley floor towards the valley sides and the open downland. This tree removal is not shown on the visualisations prepared by NH who have been asked to revise the visualisations. From slightly further away at Vp 7 views of both the existing motorway, the proposed infrastructure and increased activity will be opened up. Opportunities to screen this through new planting are limited.
- 6.9 Tree loss would also open up views across the valley towards built up parts of Winchester. For example, when looking at NH's existing winter baseline image from Vp 1 on Easton

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<sup>24</sup> APP-101 6.3 Environmental Statement Appendix 7.5 - Preliminary Arboricultural Impact Assessment

<sup>25</sup> APP-101 6.3 Environmental Statement Appendix 7.5 - Tree Retention Plan

Lane, development within Winchester has very little impact on the character of the view, which is overwhelmingly rural in character. The corresponding photomontage from this viewpoint shows how the proposed loss of existing trees along the edge of the M3 would open up extensive views of built development within Winchester. The prevailing character would no longer be rural. Instead, the foreground would be dominated by a highways landscape, which would be seen in the context of Winchester. Similar impacts would be experienced at other locations within the SDNP such as at Vp 13 from Long Walk. Although at this location Winchester is already visible in the distance, the proposed tree removal alongside the M3 would open up further visibility of the town. In this regard the proposals would increase not reduce the impact within the SDNP of visually intrusive elements associated with the M3 and A31, and built elements on the edge of Winchester both in the short and longer term. Nor would the proposals conserve or enhance the natural beauty and character of the SDNP.

- 6.10 It appears that most of the proposed vegetation loss is unavoidable as it relates to vegetation within the footprint of the proposed works and for this reason cannot be reinstated. As set out in the section below, we recommend that advanced planting is undertaken to minimise the opening up of views as much as possible. In this regard, NH should provide a plan which shows the location of the advanced planting, with an explanation for its rationale (i.e. the role each area of planting will have in terms of mitigating the impact of the proposals). It is not sufficient to rely on the EM to show this information due to the amount of information already shown on the EM.

***Issue 3: Proposed vegetation***

- 6.11 In places the width of proposed tree planting alongside the eastern edge of the M3 is only 10m wide which is unlikely to be sufficient to provide a robust level of screening of the road infrastructure and activity, particularly in the short term, for people within the SDNP e.g., Easton Lane, Long Walk, and the proposed bridleway between these lanes. In some areas, the proposed tree planting is narrower than the existing level of tree cover that would be removed, which is up to 25m in width (**Figure 9**). Further, in some areas the majority of the proposed planting is located on the cut batter rather than above the slope, where it would be more effective at providing visual relief in views from higher ground east within the SDNP. We recommend that as a design principle, tree planting along the eastern edge of the motorway is no less than 25m in width and that at least half of this planting occurs on top of the cut batter where it will be more elevated and will provide more effective screening. This will encroach on the chalk grassland which, as discussed in Section 8 below, should be extended to the east.



- 6.12 As set out in the section below, we recommend that advanced planting is undertaken to minimise the opening up of views as much as possible. In this regard, NH should provide a plan which shows the location of the advanced planting, with an explanation for its rationale (i.e. the role each area of planting will have in terms of mitigating the impact of the proposals). It is not appropriate to rely on the Environmental Masterplan to show this information due to the amount of information already shown on the EM.
- 6.13 Land between the A34 and M3 is visible to people walking on the Itchen Way, particularly on the eastern section after the A34 bridge over the River Itchen. See NH's photomontages for Viewpoint 14. This landscape is already impacted by existing highways infrastructure, but this impact would be exacerbated by the new A33 road and attenuation ponds that are proposed to be located within this area. As such, we do not consider it necessary to seek to retain views of this area from the PRoW, which appears to be NH's intention as much of the area is proposed to be retained either as grassland with some shrub planting. Given the proximity and relationship of this area to the valley floor, it would be preferable to utilise this area to accommodate more tree planting which would assist in mitigating the visual impact of the proposals on people using the PRoWs within the Itchen Valley.

***Issue 4: Tranquillity***

- 6.14 In their LVIA, NH acknowledge that the proposals would have a significant adverse impact on the sense of tranquillity within the SDNP. However, there do not appear to be any proposals to mitigate this impact or compensate for it. We recommend that NH works with the SDNPA to explore opportunities to enhance tranquillity within the SDNP including through the provision of new opportunities for visitors to experience a sense of tranquillity.

***Issue 5: Construction compound***

- 6.15 The proposal is to site a construction compound east of the gyratory. In this location, it will protrude into the SDNP and exacerbate the impact of the proposed works on the SDNP. Particularly as the compound would be located alongside the existing bridleway on Easton Lane. Although the compound wouldn't be accessed from the Lane it would be visible from it. It is not clear what if any earthworks will be required to form the construction compound, as none are shown on the drawings for the Finished Level Variance from Existing Levels. It is assumed there would need to be some grading of the slope to accommodate the compound, which will include plant storage, car parking, fuel and water storage, 'skills school', staff welfare facilities, waste segregation areas and a wheel wash. Additionally, the area would be utilised for material storage, a tree and hedging nursery area and material processing (earthworks and pavements), and storage of topsoil. The presence of the

construction compound, for the duration of the works (currently estimated by NH to be 3 years), would neither conserve nor enhance the natural beauty and character of the SDNP in this area. It would therefore be preferable if items such as the plant storage were located elsewhere within the main corridor of works or potentially within the existing Badger Farm Compound, which is located off Badger Farm Road near M3 Junction 11.

## 7 Water (Issue 6)

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### *Issue 6: Proposed swale and attenuation pond*

- 7.1 The proposals include an approximately 875m long swale alongside the proposed bridleway between Easton Ln and Long Walk, and an attenuation pond at the south eastern end of the site (**Figure 9**). The attenuation pond would be located immediately alongside the proposed bridleway. It would be visible from the bridleway as well as from Easton Lane. The swale and pond would be located east of the M3 within the open downland landscape type. These features would be incongruous within the chalk downland landscape which is otherwise characterised by large open arable fields over rolling downs and dry valley systems. The swale and attenuation pond, and the associated earthworks required to form the pond, would not read as part of the downland landscape but as part of the overall highways landscape, which would be perceived as having extended into the downland. Loss of the open download character would be exacerbated by proposals to enclose the pond at the south eastern end of the site with scrub and woodland planting - the type of planting which is currently largely restricted to the lower valley sides and valley floor. These features would neither conserve nor enhance the natural beauty and character of the SDNP in a location where there is significant interaction between the public, the SDNP and the scheme.
- 7.2 There are no plans which show the proposed contours for the attenuation pond. Neither its proposed depth, nor the steepness of its slopes. However, with a footprint of approximately 4,200m<sup>2</sup>, it would be seen as a large engineering feature in the landscape. Further information should be provided by NH explaining the detailed design of the attenuation feature and the swale, and the measures taken to ensure that any potential environmental benefits of these features have been maximised.

## 8 Chalk Grassland (Issues 7 & 8)

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### *Issue 7: Chalk grassland & farmland interface*

- 8.1 The proposals for chalk grassland within the landscape east of the SDNP would establish a new line or sub-division within the open downland. This is because the area proposed to be managed as chalk grassland would not correspond with any existing field boundaries (**Figure 9**). Instead, the outer extent of the proposed chalk grassland is arbitrary as it has been drawn using a 100m offset from the proposed bridleway. The remainder of land within the Order Limits east of the grassland would continue to be used for arable production. These differences in management regimes would establish a new pattern in the landscape, which would not correspond to any existing or historic patterns. Furthermore, it is unclear how the chalk grassland would be protected from agricultural activities and management practices which might undermine or disturb the chalk grassland.
- 8.2 At our meeting with NH on 1<sup>st</sup> March 2023, they explained that they are examining the possibility of extending the chalk grassland across the remainder of the arable field using 'Designated Funds'. NH explained that whilst this was a beneficial outcome they are exploring, it will not be included as part of the DCO application because it would require changes to the permanent land take. NH suggested at the meeting that the chalk grassland is not mitigation but a benefit and therefore in their view no additional grassland conversion is required for the project. We strongly disagree with this view. In our opinion, when all of the works are taken into consideration, the overall balance, in terms of the impact of the proposals on the SDNP, is negative. The proposals overall do not conserve or enhance the landscape of the SDNP. Further measures are required to balance the landscape outcomes of this project, and in our opinion, the fields east of the M3 should be treated as one, and all reverted to chalk grassland.

### *Issue 8: Chalk grassland on embankments and areas of fill material*

- 8.3 We query the proposals to manage lower embankments alongside the M3 as chalk grassland as these areas, due to their location and gradients and the proposal to plant trees and shrubs at the top of the slopes, are likely to be difficult to access and manage to achieve the establishment and long-term success of chalk grassland that is species rich.

- 8.4 At our meeting with NH on 1<sup>st</sup> March 2023, NH agreed to provide further details on the proposals for chalk grassland on areas of cut and fill, with reference to outcomes achieved as part of the A31 upgrades. Further information has been provided, chalk Grassland Creation 12<sup>th</sup> May 2023. Although the upgrade of the A31 was originally cited as an example no information from that scheme has been provided. The information provided is from the A354 Weymouth Relief Road. We do not consider that this scheme is comparable for two key reasons, the fragmentation of the areas of chalk grassland located along the highway verges and the trees and shrubs proposed for the top of the slopes. It is only the band of chalk grassland proposed on the top of the down that we consider has a high likelihood of development as chalk grassland.
- 8.5 We are not convinced that the cut chalk faces and the fragmented highway verges are capable of becoming chalk grassland and that they should not, therefore, be counted as mitigation as far as the SDNP is concerned.

## 9 Access to the South Downs National Park (Issues 9 & 10)

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### *Issue 10: Proposed PRow upgrades*

- 9.1 During construction, existing PRowS would be required to be temporarily closed and diversion routes would be implemented. We have been unable to find a plan that shows the proposed PRow diversions during the construction phases. If missing this should be submitted by NH.
- 9.2 Proposals for the operation phase include a new bridleway between Easton Lane and Long Walk, a new shared foot/cycle connection beneath and around the gyratory, and a new shared foot/cycle route alongside the A34 (**Figure 7**). These upgrades are supported because they would contribute to the SDNP priority of improving accessibility to the landscape within and around the SDNP. In particular, we support the principle of providing a bridleway in the fields east of the M3 as it would provide an off-road connection between the foot/cycle way leading out of Winchester and the wider PRow network in the Itchen Valley north of Long Walk.
- 9.3 However, the rationale for the alignment of the proposed bridleway between Easton Lane and Long Walk is arbitrary and does not take the optimum route in landscape and visual amenity terms. NH explained at the meeting on 1<sup>st</sup> March that the route was designed to establish a 1:20 grade. However, given that the route will be located on land subject to reprofiling works, this grade could be formed elsewhere. In our opinion, it would be preferable to have the route further east of the M3 or at least provide an alternative walking route further up the slope away from the motorway corridor, where views will be more extensive and the impact of passing vehicles on the amenity of the route would be expected to be less.
- 9.4 The proposed PRowS alongside the A33 and A34 are very close to the proposed carriageways and as such are unlikely to be attractive routes. Further details on design measures taken to ensure these routes are attractive, through measures such as bunds between the walking and cycling route as well as replacement tree planting to provide additional cover and relief from the surrounding highway proposals, should be provided.

### ***Issue 11: Proposed subways***

- 9.5 The gyratory is going to be a key gateway into the SDNP from Winchester and people using the National Cycle Network (Route 23). NH's submitted Engineering Sections include typical sections for the proposed foot/cycle routes, but none show the proposed underpasses around the gyratory. The existing underpasses are unattractive due to their narrow width, and low height.
- 9.6 Following our meeting with NH on 1<sup>st</sup> March 2023, NH have confirmed the dimensions of the existing subways and the four proposed subways, which are:
- Existing subways - 3m wide, 2.3m high and 16m in length.
  - Proposed subways - 4m wide, 2.7m high and between 22.17m - 28.17m in length.
- 9.7 The dimensions for the proposed subways accord with the minimum dimensions for unsegregated subways for pedestrians and cyclists as set out in the Design Manual for Roads and Bridges (DMRB) CD 143 Version 2.0.1 - Designing for walking, cycling and horse-riding (Table E/4.11). If the intention is for the pedestrian and cycle routes to be segregated e.g., through a physical barrier, the minimum width of the subway would need to be increased to 5m. NH should therefore confirm if the routes will be segregated or unsegregated. We are concerned that the subways appear to be proposed for equestrian use as well although we do not consider that they are sufficiently wide to accommodate equestrians.
- 9.8 NH should provide an explanation of the detailed design measures that have been taken to maximise the sense of spaciousness and the actual and perceived sense of safety within the subways, such as:
- The use of lighting to maximise visibility and to create daylight effect.
  - The use of materiality or colour choices to create visual interruptions to minimise the perceived length of the subways.
  - The use of consistent surfacing to establish a smooth transition between exterior and interior of the subways.
- 9.9 Regarding the existing PRoW alongside the River Itchen, it is understood that the combined width of highways structures crossing the River Itchen and the PRoW will increase, including as a result of the proposed 3.5m wide footbridge alongside the A34 northbound. Currently, the Itchen Way uses the PRoW beneath the existing bridges, which are very low in relation to the footpath. Due to the noise and low height of the existing route beneath the bridge this route is unattractive. Further details on the relationship between the proposed works and this important promoted route should be provided, including details of any opportunities taken for its enhancement.

## 10 Comments on Submitted LVIA

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### *Assessment of Effects*

- 10.1 We agree with the LVIA, that the SDNP has very high sensitivity to the changes proposed. We also agree that the proposals would result in significant adverse effects on the landscape of the SDNP during construction and Year 1 of operation even when the embedded and essential mitigation measures are taken into consideration.
- 10.2 We disagree with the LVIA where it finds that landscape effects on the SDNP would no longer be significant at Year 15 of operation. There seems to be no narrative text to support the assessment in *Table 7.27: Operation phase non-significant landscape effects - summer year 15* that the magnitude of change on the SDNP and on the affected LCAs within the SDNP at summer year 15 is '*negligible*'.<sup>26</sup> The only additional reference is in the final paragraph of the LVIA which states that '*The effects reduce to a slight adverse and not significant effect in the long term as landscape mitigation planting successfully establishes to aid landscape integration and provide visual screening*'.<sup>27</sup> This omits the fact that the assessment only refers to summer at year 15.
- 10.3 There is no explanation as to how the incursion and expansion of the motorway landscape into the SDNP, which will result in the erosion of intrinsic characteristics such as the downland topography and the loss of trees that cannot be replaced, could be reduced to negligible. We consider that there would in fact be a residual and permanent moderate adverse effect on the SDNP, which will be significant.
- 10.4 We do not agree with the approach taken by the LVIA to assess only effects during summer at year 15. Winter effects are as important as summer effects as they last for about half the year and there is no justification for excluding them. It is the equivalent of excluding half of the viewpoints from which views are available and indeed excluding the half from which views are most likely.

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<sup>26</sup> REP1-003 ES Chapter 7 Landscape and Visual (Rev 1) (clean) Page 40

<sup>27</sup> REP1-003 ES Chapter 7 Landscape and Visual (Rev 1) (clean) Page 55 paragraph 7.11.15



### **Visualisations**

- 10.5 The effects have been underestimated in the LVIA chapter and they are also underestimated in the accompanying visualisations submitted by NH which form part of that assessment. The visualisations fail to accurately show the loss of vegetation. We identified that this was the case for Vp 14 and the revised Vp 14 submitted at Deadline 1 (REP1-010<sup>28</sup>) has confirmed that the tree removal had not been shown. We have now reviewed the other visualisations and there is a more significant failure to show tree loss from Vp 3 and Vp 7. NH have said that they are reviewing the visualisations and will submit new visualisations for Deadline 3.
- 10.6 In addition to the failure to show tree removal the visualisations do not show the full impact of the proposed works because:
- Planting growth appears optimistic, particularly at Vp 1.
  - Structures such as the attenuation ponds are not shown.
  - The road, particularly at Vp 14, is not how it will actually look. There are no vehicles, no barriers, no road markings etc.
- 10.7 For the benefit of the ExA all the visualisations should be checked and updated so that they reflect as accurately as possible, what will be seen with the proposed development in place.

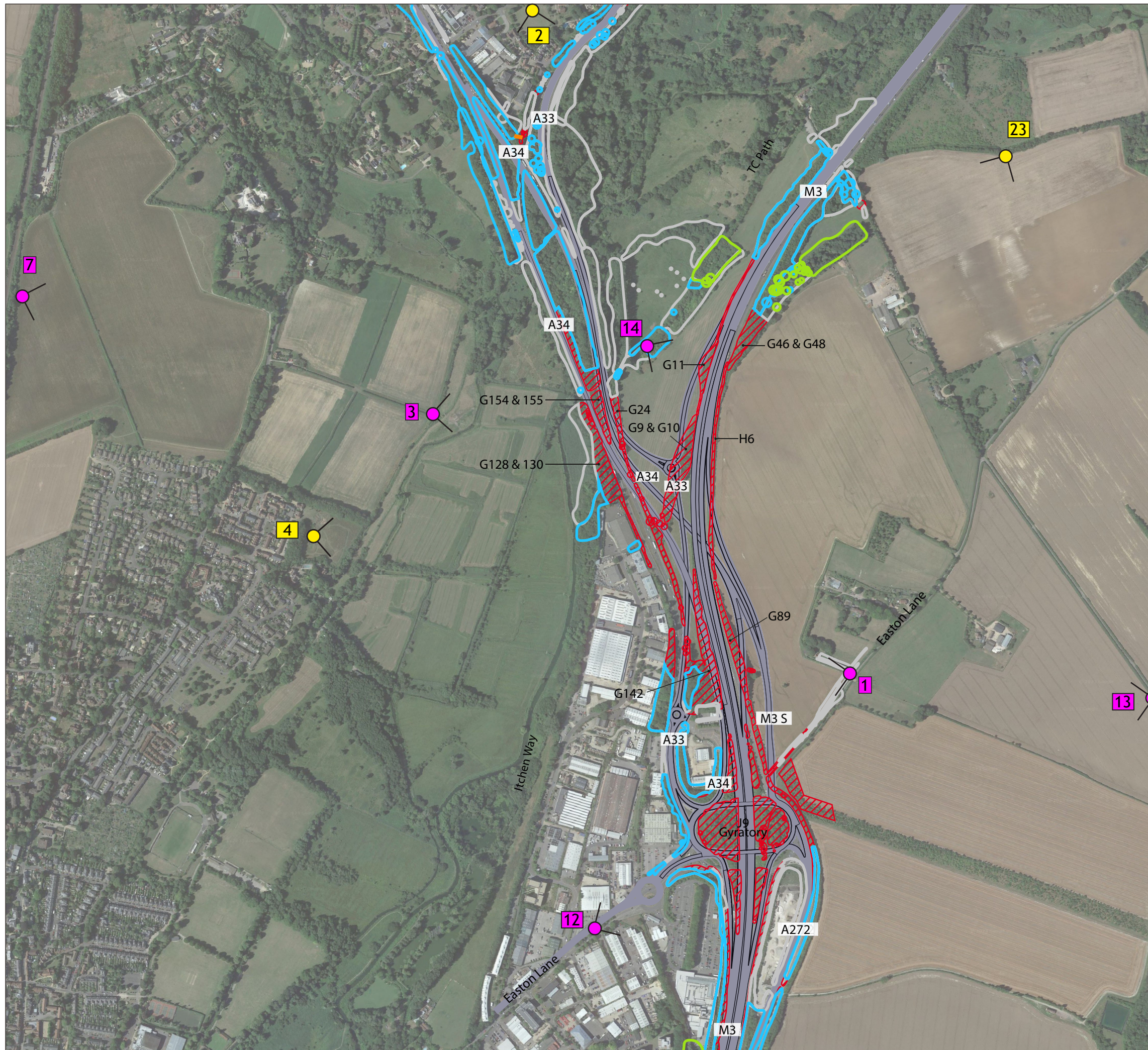
### **SDNP View Characterisation and Analysis**

- 10.8 The LVIA identifies that Vp 3 has have been identified by the SDNPA as being a representative view by the SDNPA, illustrative of the diverse, inspirational landscapes of the South Downs, and considers that the Vp has Very High Sensitivity. However, all viewpoints within the SDNP are considered to have Very High Sensitivity. There is no consideration within the narrative description of effects (APP-100 6.3 Environmental Statement - Appendix 7.4: Schedule of Visual Effects pages 7 & 8) of whether changes to a view identified as representative by the SDNPA viewpoint may be of greater significance, especially as this is not a single viewpoint but represents views from a significant stretch of St Swithun's Way.
- 10.9 The SDNPA disagrees with the conclusion with regard to the effects from Vp 3, that at year 15 the magnitude of change would be negligible. Trees to be removed cannot be fully mitigated and traffic on the new sections of slip road are likely to be visible from St Swithun's Way.

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<sup>28</sup> REP1-010 Deadline 1 Submission - 6.2 Environmental Statement - Chapter 7: Landscape and Visual - Figure 7.14

## Appendix 1 Figures



**FIGURE 8A**  
**Tree Removal Plan &**  
**LVIA Viewpoints**



PROJECT  
 1261  
 M3 Junction 9

CLIENT  
 South Downs National Park

DATE  
 March 2023

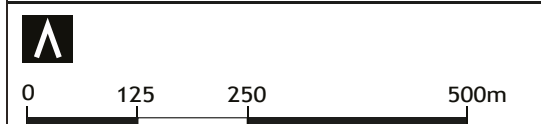
**Legend**

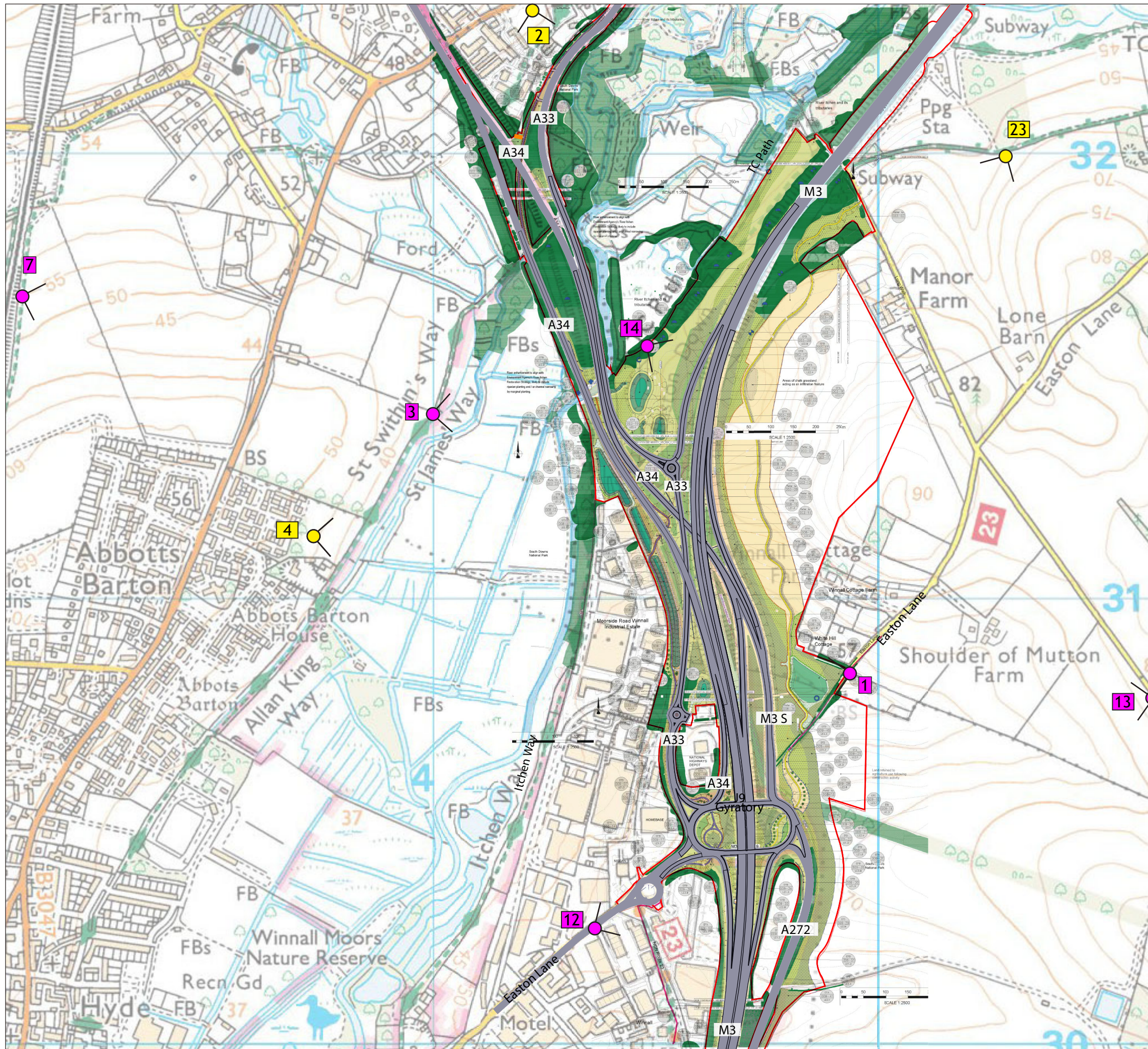
- 1 LVIA Viewpoint
- 7 LVIA Visualisation

**Proposed Tree Retention/Removal**

- Category A Retained
- Category B Retained
- Category C Retained
- Tree removal

Source: 6.3 ES Appendix 7.5 Tree Retention Plan





**FIGURE 9A**  
*Environmental Masterplan & LVIA Viewpoints*



PROJECT  
 1261  
 M3 Junction 9

CLIENT  
 South Downs National Park

DATE  
 March 2023

**Legend**

Order Limits

1 LVIA Viewpoint

7 LVIA Visualisation

**Environmental Masterplan**

**Proposed Landscape Elements:**

**Grassland (LE 1)**

- LE1.1 Amenity Grass (EFK)
- LE1.3 Chalk Grassland
- LE1.3 Species Rich Grassland

**Planting (LE 2)**

- LE2.1 Woodland (Broadleaf)
- LE2.4 Linear Belts of Shrubs and Trees
- LE2.8 Native Scrub Planting

**Hedgerows (LE 4)**

- LE4.3: Native Species Hedgerow

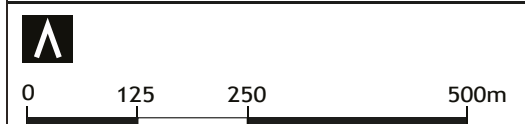
**Trees (LE 5)**

- LE5.1: Individual Trees

**Wetland Habitats (LE 6)**

- LE6.1 Waterbodies and Associated Plants
- LE6.2 Banks and Ditches
- LE6.4 Marsh and Wet Grassland

Source: Figure 2.3 - Environmental Masterplan



## Appendix 2

Extract from South Downs National Park: View Characterisation and Analysis Final Report  
Prepared by LUC on behalf of the South Downs National Park Authority November 2015



[www.landuse.co.uk](http://www.landuse.co.uk)

# South Downs National Park: View Characterisation and Analysis

**Final Report**  
Prepared by LUC on behalf of the South Downs National Park Authority  
November 2015



# 1 Introduction

## Background to the study

- 1.1 South Downs National Park Authority commissioned LUC in 2014 to prepare a View Characterisation and Analysis Study comprising a mapping and analysis of views to, from and within the National Park.
- 1.2 The study will form part of the evidence to guide both future planning and development management decisions by the South Downs National Park Authority and its partner authorities.

## Aims and purpose

- 1.3 The existing South Downs Integrated Landscape Character Assessment (SDILCA 2011) is the foundation of the evidence base for landscape for the SDNP. This study will sit alongside the SDILCA to provide evidence on views, as well as providing a visual 'way into' understanding the SDILCA which is perhaps less accessible to the layperson.
- 1.4 The study is intended to provide a foundation for evidence on view types within the National Park and its setting to:
  - support development management, including being used for evidence on landscape and visual matters;
  - provide information to assist Neighbourhood Planning teams and other community planning groups, Parish Councils and Landowners with assessing the impacts of proposed land use change;
  - provide evidence to inform the delivery of the SDNP Partnership Management Plan, supporting the SDNP in working to protect and enhance the Special Qualities of the NP;
  - form part of the landscape evidence base for the South Downs National Park Local Plan which is planned for adoption during 2017;
  - provide a snapshot of the National Park as it is today as a baseline against which future landscape change could be monitored for the 'State of the Park' Reporting<sup>1</sup>;
  - provide evidence about the setting of the park and the range of potential visibility to and from the park.

## Outputs and uses

- 1.5 Outputs are as follows:

**This report** – which presents the key view patterns, a range of representative views and key areas of overlapping visibility (**Section 2**) and presents an analysis of the key types of view to inform decisions about change (**Section 3**).

**Viewsheds from representative viewpoints located in and around the National Park** – this includes 360 degree viewsheds showing areas visible at ground level as well as heights above which objects would become visible from those viewpoints (abbreviated 'HOBV'), covering an area up to 35km from each viewpoint. These can be used to assist with visual impact assessment of a range of potential land use changes. The viewsheds have been provided to the SDNP as GIS

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<sup>1</sup> As recommended in DEFRA's 'English National Parks and the Broads UK Government Vision and Circular 2010'

## 2 View patterns, representative views and visual sensitivity

*"There are stunning, panoramic views to the sea and across the Weald as you travel the hundred mile length of the South Downs Way from Winchester to Eastbourne, culminating in the impressive chalk cliffs at Seven Sisters. From near and far, the South Downs is an area of inspirational beauty that can lift the soul"<sup>2</sup>*



### Introduction

- 2.1 This section of the report considers view patterns, representative views and visual sensitivity. It explores view patterns to, from and across the National Park; presents a selection of representative views to represent the various types of view found across the park; examines the viewsheds from these viewpoints; and sets out key landmarks and their viewsheds.

### View patterns

- 2.2 Study of Ordnance Survey maps, literature about the South Downs and its special qualities, guides to the many long distance footpaths that traverse the Park, field visits, and discussions with the National Park's Area Teams indicate that there are a huge number of breathtaking and scenic views to, from and across the South Downs that are experienced by many visual receptors including residents and visitors to the National Park. These include:
- Iconic/ promoted views from specific viewpoints such as:
    - viewpoints marked as such on Ordnance Survey maps;
    - viewpoints where facilities for the enjoyment of the view have been provided;
    - viewpoints noted in the SDLCA as being natural observation points from which to appreciate the landscape;
    - views that have been painted and now form an 'iconic' representation of the South Downs in people's minds.

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<sup>2</sup> Taken from South Downs National Park Special Qualities [<http://southdowns.gov.uk/wp-content/uploads/2015/03/SDNP-Special-Qualities.pdf>]



- Extensive and/or repeating views that may represent certain special qualities or characteristics of the South Downs, or represent sequential views from routes, such as:
  - Views from the high chalk downs looking north (including breathtaking views from north facing scarps) – from the Open Downs, Wooded Estate Downland and Downland Mosaic;
  - Views from the Hampshire Hangers (i.e. from the Selbourne Hangers, part of the 'Major Scarps' LCT);
  - Views from the high chalk downs looking south across the coastal plain/seascape (including breathtaking views from the cliffs) – from the Open Downs, Wooded Estate Downland and Downland Mosaic;
  - Views across the undeveloped downs from within the heart of the National Park, often including a backdrop of land outside the National Park;
  - Views from the Greensand Hills (elevated/panoramic and breathtaking views, as mentioned in the SDILCA);
  - Views towards the strongly sculptural chalk landform viewed against open sky (noted as a key integrating theme at the start of the SDILCA as making the South Downs special) – this can include views from outside the NP;
  - Views associated with chalk river valleys (LCT E in the SDILCA) and major rivers with floodplains (LCT F);
  - Views from the South Downs Way (the "*stunning, panoramic views to the sea and across the Weald as you travel the hundred mile length of the South Downs Way from Winchester to Eastbourne*" are specifically referred to in the special qualities statement for the National Park).
- Views of specific landmarks and features.

## Representative views

- 2.3 A selection of views was drawn up to represent the various types of view found across the park. The list focusses on those:
- that reveal the special qualities of the South Downs;
  - that are noted in the SDILCA as being natural observation points from which to appreciate the landscape character of the South Downs;
  - that are marked as key viewpoints on OS maps;
  - where facilities for the enjoyment of the landscape and views are provided.
- 2.4 The SDNPA ran a public survey which invited public input to the list of views (see Appendix 4 for information about the survey and the survey results). This resulted in an additional 11 views being added to the list.
- 2.5 It should be noted that there will be many other notable and valued views that will require consideration as part of the assessment of any individual development proposal, but this has been drawn up to provide a representative selection. Many of the views are snapshots from a series of sequential views available along a route or series of possible view locations. Even when at a viewpoint the view changes depending on where the viewer is located.

**Table 2-1: List of representative views**

View number and name and	Grid reference <sup>3</sup> (see Figure 2.1 for map of approximate locations at 1:250K scale)		Reason for selection
1 Beachy Head	559045	095749	This viewpoint is located at the Compass Rose (installed to mark the Millennium, located part-way between the Lookout viewpoint marked on OS maps and the Trig point), and is a good point from which to appreciate views of the south east coast. The South Downs Way and Wealdway pass through this area and views are noted in literature about these trails (the Wealdway refers to the 'dizzy heights of Beachy Head'). The Marine Management Organisation's (MMO) commissioned Seascape Assessment for the South Inshore and South Offshore Marine Plan Area <sup>4</sup> indicates that the viewpoint falls within an area with the most extensive sea views.
2 Devil's Dyke	525673	110871	There are a range of viewpoints in this popular recreational area, offering views that are noted in the SDILCA and in literature about the South Downs Way National Trail. These include views into the large dry valley of the Devil's Dyke, a key and distinctive landscape feature of the SDNP, views north from the Adur to Ouse Downs Scarp (LCA H2) over the Low Weald (noted in the SDILCA), and also views southwards to the coast. The selected view, from close to the OS trig point to the west of the Dyke, provides panoramic views over the Weald, along the scarp and also south over the rolling chalk dip-slope down to the sea at Hove.
3 Birling Gap	555611	095753	Noted as a viewpoint that reveals the scenic coastline in the SDILCA, dramatic views west are available from this area east of Birling Gap along the Seven Sister cliffs to Seaford Head and out to sea, revealing the iconic chalk sea cliffs. A nearby car park and visitor facilities mean views from this section of the South Downs Way are well visited.
4 Edburton Hill	523207	111006	An OS-marked viewpoint providing 360 degree panoramic views from the top of a steep Downs scarp looking north to the Low Weald. The viewpoint is noted in the SDILCA as typical of views from the Adur to Ouse Downs Scarp (LCA H2) and is noted as a key viewpoint in literature about the South Downs Way.
5 Old Winchester Hill	464083	120553	Located on an elevated Iron Age hillfort, this is a natural observation point and OS marked viewpoint. From this flat-topped chalk spur there are views in all directions (although the viewer may have to walk to the edge of the hill to experience views in different directions). The South Downs Way and Monarch's Way pass through the hillfort and views are noted in literature about these trails. The viewpoint is also identified in the SDILCA as a key viewpoint from <i>LCT D Downland Mosaic</i> .
6	551085	100908	Located at the crest of a steep slope enclosing the Cuckmere River valley, this OS marked viewpoint provides elevated views along the

<sup>3</sup> The grid references located the viewpoint on a 1:50,000 OS map. In some instances it may be necessary to move around an area to experience different aspects of each view or obtain the best view.

<sup>4</sup> <https://www.gov.uk/government/publications/seascape-assessment-for-the-south-marine-plan-areas-mmo-1037>

View number and name and	Grid reference <sup>3</sup> (see Figure 2.1 for map of approximate locations at 1:250K scale)		Reason for selection
60 Pulborough Gun Emplacement	503793	118979	This location, on a locally elevated point, provides a good view of the Arun Valley with the Downs behind. It was suggested for inclusion by the SDNP Central team.
61 Chichester Harbour AONB	479523	101524	This viewpoint represents views of the South Downs from Chichester Harbour AONB and shows these two protected landscapes together. This view is from the New Lipchiss Way at West Itchenor, looking up Bosham Channel and reveals the 'whale-backed' form of the downs.
62 Itchen Valley from St Swithuns Way	448986	131388	This view illustrates the water meadows in the Itchen Valley – illustrating the diverse, inspirational landscapes of the South Downs. It also shows the countryside/urban interface along SDNP boundary at Winchester.
63 Heyshott	489808	117632	This view illustrates the scarp as seen from the New Lipchiss Way between the village of Heyshott and the foot of the scarp – this is also representative of many views gained from 'underhill lanes' along the bottom of the chalk scarp.
64 Uppark from the south	476537	116213	This is a good view of Uppark from the south (from the footpath between Hucksholt Farm and Eckensfield). Suggested for inclusion by one of the SDNP Area Managers. Shows one aspect of the rich cultural heritage of the SDNP.
65 Stane Street South	496550	112450	This view, from Stane Street just south of Bignor Hill (part of the Monarch's Way), provides excellent views of the SDNP merging into the coastal plane. Suggested for inclusion by one of the SDNP Area Managers.
66 Halnaker Windmill	492004	109663	This location (the Halnaker Windmill) provides a natural vantage point from which to experience views across the dip slope of the Goodwood to Arundel Wooded Estate Downland. Suggested for inclusion by one of the SDNP Area Managers.
67 West of Teglease Down	464895	120381	This location, on the Monarch's Way, provides a good view across the Meon Valley to East Meon. Suggested for inclusion through a response to the public survey.
68 Ashford Hangers NNR	473889	126886	This view, from the Ashford Hangers NNR at top of the Shoulder of Mutton, provides a good view south towards to the South Downs. Suggested for inclusion through a response to the public survey.
69 Houghton Bridge	502414	111811	This view, from Houghton Bridge (B2139 road bridge) over the River Arun, provides a good view south over along the Arun valley with the Downs in the backdrop. Suggested for inclusion through a response to the public survey.

## Views associated with chalk river valleys



Looking north along the Itchen and adjacent watermeadows, just north of Winchester (VP62)

### Description

- 3.54 This view type includes short-distance riverside views within the chalk valleys, typically contained by vegetation, and more panoramic views from the adjacent downlands, in which the rivers themselves are often hidden from view.

### Examples of views

- 3.55 There are many views along the chalk river valleys and these don't tend to be specifically marked on a map in the way that the panoramic views from the scarp tops are. Nevertheless they are important to the experience of the South Downs and its special qualities. Viewpoints 8, 15, 35, 47, 62, 67 and 73 represent this view type, although there will be many other localised views within the valleys.

### Monitoring Points

- 3.56 The following viewpoints have been photographed as monitoring points: 8, 15, 47 and 62.

### Special Qualities

- 3.57 These views illustrate the iconic wetland habitats associated with the chalk streams and rivers of the South Downs. They reveal the tranquillity associated with the valleys, the contribution that farming has made to the character of the landscape (watermeadows, late medieval enclosures around villages and later field enclosures). The views also reveal the distinctive settlement pattern (nucleated villages indicative of medieval manorial farm systems and gentry houses with landscaped parks).

### Threats

- 3.58 Threats to this view type could result from changes that affect the iconic wetland habitats associated with the chalk streams and rivers, changes that affect the distinctive settlement pattern of nucleated villages indicative of medieval manorial farm systems surrounded by medieval enclosures, changes that impact on the gentry houses and landscaped parks, or development that impacts on the tranquillity of the valleys.

### **Aim & Management Guidance**

- 3.59 The aim is to ensure that there remain opportunities to access and appreciate these more intimate landscapes and views, and to ensure the tranquil and unspoilt character of the valleys are retained. In particular, it will be important to:
- Maintain the marginal vegetation, water meadows, marshes and wet woodland that are typical of the wetland habitats associated with the chalk streams and rivers of the South Downs.
  - Maintain the pastoral nature of the valley floors and sense of tranquillity associated with the valleys. Conserve the blocks of early enclosure that survive throughout the valley.
  - Protect the features that reveal the agricultural/industrial use of the river, including fragments of watermeadows, weirs and mill ponds, fish farms, trout lakes, and watercress beds.
  - Maintain undeveloped floodplains and the nucleated form of villages which are a reflection of the medieval manorial farm systems – ensure any new development is well integrated in terms of scale, form and materials.
  - Protect the rural character of the valleys, limiting encroachment of suburban influences into views.
  - Protect views of gentry houses and their landscaped parks.
  - Refer to landscape type E (chalk valley systems) for more detailed guidance, contained in the South Downs Integrated Landscape Character Assessment.



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