

## **GLVIA consultation 1: proposed structure**

### **Introduction**

Representatives of national agencies and members of the LI and IEMA were invited to comment on the proposed structure of the revised GLVIA. An online survey ran for three weeks in November-December 2010 hosted by the LI. Questions asked for feedback on the suggested content of each chapter, and for general comments on the structure as a whole.

The survey was publicised to LI and IEMA members through their online news communications. Agency representatives were invited by email personally. 134 people clicked on the link to view the survey, 51 started it and 29 responses were submitted - a 57% completion rate. 73% of respondents were members of the LI, 15% IEMA were members, 8% were members of both bodies and 4% a member of neither. The raw data from the survey, ie all survey responses in their original form, are set out below, along with the proposed content of each chapter.

The GLVIA Advisory Panel considers that the comments submitted give an overall approval to the proposed structure, and will proceed accordingly.

## PART 1

*Part 1 sets out introduction to the revised edition, summary of content, and discussion of general context in which LVIA is undertaken and its significance. Discursive in tone – aimed more at students, laypeople, those new to the subject etc. Explanatory, scene-setting content, more focus on theory and background rather than practicalities.*

### **Chapter 1: Introduction**

- Purpose
- What is LVIA
- Why LVIA is needed
- Who undertakes LVIA for whom and when
- Significant developments since 2<sup>nd</sup> ed and changes introduced in this ed

### **Q1. DOES ANY OTHER CONTENT NEED TO BE INCLUDED IN CHAPTER 1: INTRODUCTION?**

Important for lay people to explain what 'landscape' is. Refer to ELC context for defining landscape. Also explain why landscapes are important to consider (rather than just assuming that landscapes will manage themselves) and briefly set out some key principles such as 'all landscapes matter' and that 'landscapes change over time' so the purpose of our input is to inform the nature and extent of change (eg to maximise the benefits and services it provides to us) rather than to try to 'stop evolution'!

The new edition needs to stress the application of the GLVIA for a range of assessments including the historic environment. We need a common approach to LVIA by all whether landscape architects or archaeologists.

There is a need for all stakeholders including applicants, developers, agents, councillors, local authority officers, planning staff etc. to understand and sign up to the best practice guidelines of LVIA in order that good quality, sustainable design and the protection of the environment can be achieved. This needs to be stressed in the introduction.

A bit of history; how we got here; the usefulness of earlier editions; their status with planners and the Planning Inspectorate.

Policy background

yes - a 'how to use section'

Relationship between EIA and LVIA

It is all pretty generic at the moment - perhaps definitions should be set out here?

General comment on the role of professional judgement in determining levels of impact/effect, and for transparency and clarity in the articulation of the basis for these judgements .

**Chapter 2: Scope of the guidance**

- *Relevance to England, Wales, Scotland and NI*
- *Focus on principles and fundamentals (which have longevity)*
- *LVIA not just an assessment tool but also a design and enhancement tool*
- *Structure of the guidance:*
  - *A focus on the core principles throughout (the 'core' dealing with effects assessment throughout with clarity about criteria)*
  - *Clarity about principles and process versus prescriptive components*
  - *Summary/checklist conclusion to each chapter*

**Q2. DOES ANY OTHER CONTENT NEED TO BE INCLUDED IN CHAPTER 2: SCOPE OF THE GUIDANCE?**

Have the Republic of Ireland and the Isle of Man been invited, and Channel Islands? I think they use this guidance too. Their endorsement - small for us, may be very helpful for them. Also can we mention something for lay people who may think that landscape is all 'in the eye of the beholder'? We need to show how LVIA, whilst needing to make qualitative judgements, is a consistent, structured, repeatable, impartial process specifically designed to minimise personal subjectivity creeping in.

Reference should be made to the requirements of the European Landscape Convention in England, Wales, Scotland and Northern Ireland.

No but more should be made of LVIA as a design and enhancement tool

Limitations; situations where LVIA is not the most appropriate approach / tool?

Scope - should allude to EU basis for EIA, overview of evolution of EIA process

The section could refer to the role of the guidance i.e. it is best practice guidance and can be interpreted in different ways depending on the type and scale of development.

- 1 Assessment and design development as an iterative process
- 2 Objective and independent assessment required to accord with EIA Regs.

The new edition still only addresses relevance to the UK. Unfortunately, this manual is the only worthwhile guidance of its kind and therefore those of us IEMA members in other countries use it all the time. Some token information could be written regarding the fact that as an English Language publication it is going to be used outside the UK as an example of Best Practice, and what are areas that practitioners in other countries should and should not use it as a reference for. For example, what does the IEMA recommend for Assessors working in countries without a shred of guidance or designated landscapes or any other statutory requirements or L&V policy?

Yes - greater clarity in the fundamentals of an LVIA methodology

There was talk at one stage about having LVIA guidance for specific types of development like commercial scale windfarms - is this still the case & if not it needs to be explained somewhere as to the scale of proposals that this guidance would be applicable for

### **Chapter 3: Context**

- *Scoping - landscape and visual issues for consideration in LVIA*
- *Relationship to EIA/SEA, seascape, townscape, cumulative assessment, ELC and national and local planning*
- *Links to other disciplines, eg archaeology, historic environment*
- *Time: e.g. 'point in time' assessment or more 'speculative' assessment considering climate change or 'sustainability' for example?*
- *Ecosystem services*
- *Brief mention of community engagement?*

### **Q3. DOES ANY OTHER CONTENT NEED TO BE INCLUDED IN CHAPTER 3: CONTEXT?**

Under 'ecosystem services' can we also add 'Green Infrastructure' as this is likely to be increasingly important additional baseline to show the 'internal workings' of landscape character areas. It will be a very helpful bridge between character areas and showing the what and the where of the benefits and services those character areas produce.

Chapter 3 needs to stress the need to integrate LVIA and EAs so both inform each other and that some issues e.g. historic environment will need to be covered in both.

Reference to the specific historic environment assessment approaches will need to be included as listed in the draft structure document.

Context will need to consider the new Big Society and Localism agendas and the role of the professional.

Context will also need to consider ecosystem services and green infrastructure planning policy.

- Links to other disciplines should include the design and construction professions including architecture, engineering etc.

- Community involvement is integral to The Planning Reform of Northern Ireland, currently being reviewed and the coalition government's move towards The Big Society.

- Community engagement is also particularly important for the more contentious and often larger projects and should be included in the guidance as a requirement of LVIA.

Include reference to LCA: how they are linked etc.

Reference to PPS5 within historic env. & how wide reaching this could be

Relationships / value to planning, both in policy formulation [not often applied currently] and development management.

Landscape functions - much more relevant and less confusing than ecosystem services

Will this section refer to other existing guidance that it should be considered alongside, such as 'Landscape Character Assessment Guidance' by the countryside agency and SNH, or guidance specific to different development types.

No - and I'm not sure what Ecosystem Services is meant to be about! wouldn't things ecological come under 'links to other disciplines'?

Definitely context on community engagement to lead into perceptual / cultural qualities of landscape character

I am unclear how community engagement is part of LVIA - although I of course recognise its very important role in EIA and planning

Not sure I understand what 'ecosystem services' means - clarify/modify?

Links to other disciplines: - including commonality of approach to impact assessment  
Time: also changing impacts of a development over time short/medium/long term eg as mitigatory planting matures

Ensure that links to recreation are covered

More info on Scoping. What are the Key Lines of Enquiry that L&V Assessors should explore in EIA Scoping documents?

Links to other disciplines needs to clarify the relation between LVIA and historic landscape characterisation and effects upon setting of historic features.

Time - needs to have regard to landscape dynamics - e.g. known change to the current baseline, such as future landform change from adjacent quarry.

#### **Q4. SHOULD ANY OTHER TOPICS BE INCLUDED IN PART 1 IN ORDER TO INTRODUCE THE SUBJECT AND CONTEXT?**

I did think that a diagram of the LVIA process might help so we can see the stages in relation to EIA regs and at what points which 'ingredients' are added into the mix and what the main ingredients are. This should communicate visually and be a page that people copy and stick on their office wall!

I would like to see the historic environment integrated throughout the 3rd edition.

In our experience, because LVIA's are carried out by the applicants/agents, there tends to be a bias towards understating the significance of impacts. In order to reduce this bias LVIA's should, ideally, be carried out by independent assessors. Consideration should be given to building this into the guidelines as best practice.

More should be made of LVIA as a design and enhancement tool

Landscape character assessment [and historic landscape characterisation] - key and fundamental to the whole process so should be introduced early

Broad overarching section which provides the links between LVIA and EIA/SEA and good design etc may be best as a diagram showing connections and outcomes.

Yes - the fundamentals of a methodology need to be spelt out

1 Landscape and visual effects are separate but inter-related subjects.

2 Difference between 'impacts' and 'effects'

## PART 2

*Part 2 sets out fundamental core principles and required processes. Tone will be less discursive and more focussed on methods, procedures and technical issues. Checklists, bullet points, text boxes, flow charts, diagrams etc will be included as appropriate, with photographs and illustrations where relevant.*

### **Chapter 4: Principles and overview of process**

- *Methodology and terminology*
  - *Effects assessment: magnitude, sensitivity, significance. (Impact/effect)*
  - *Defining EIA and SEA significance*
  - *Dealing with legal, policy, LCA context depending on geographic location*
  - *Tailoring approach to appropriate level of detail required (scale)*
- *'Length and presentation' of the assessment: relevant and appropriate content*
- *Landscape (impact) Assessment*
- *Visual (impact) Assessment*
- *Cumulative (impact) Assessment*
- *Recording key steps and maintaining an audit trail*
- *Monitoring*
- *Visualisations, illustrations, GIS and modelling tools*
- *Key steps (flow chart?)*
- *Summary/checklist*

### **Q5. DOES ANY OTHER CONTENT NEED TO BE INCLUDED IN CHAPTER 4: PRINCIPLES AND OVERVIEW OF PROCESS?**

There has been much confusion and misuse of what constitutes 'landscape value'. Can this issue be spelt out? The issue is often that 'landscape value' is assumed to be represented by the presence of, and types of, designations. Alas this can lead to conclusions that the lack of these must mean no or little value. This is rubbish. Perhaps it is time for the concept of landscape value to be refreshed as 'benefits and services' (to use the new language) of which designations indicate how certain areas are formally designated to recognise particular benefits and services, but these should not be taken to be uniformly distributed or confined to just designated areas. For example there will be many areas of outstanding natural beauty outside the areas so designated. The aim is to widen the recognition of how landscapes are valuable to us, to express these in ways that decision-makers will be receptive to, (they are following the ecosystems approach), and to sound less naive to local communities who don't happen to live in a designated area, but who attach great importance to what benefits and services their local landscapes do provide them with.

As well as LCA, this chapter also needs to include Historic Landscape Character Assessment and the range of HLC scales.

<p>The Big Society agenda may mean local assessments like Village Design Statements and Local Lists may have greater influence?</p> <p>I'd like to see views and settings included in this chapter. This would help develop practice standards for PPS 5 policies.</p>
<p>The terminology suggested in edition 2, Appendix 6 can be confusing and there is too much reliance on the written word which can be open to interpretation. The criteria descriptions need simplified and clarified and the number of alternatives reduced.</p>
<p>The vital role a good, value neutral, LCA [+ HLC] has in the whole impact assessment process</p>
<p>Nature of effects (adverse/beneficial)</p>
<p>Relationship between sensitivity and capacity?</p>
<p>#This chapter should refer to the difference between Landscape and Visual assessments, stressing the importance that these are separate processes.</p> <p>#There should be key definitions, e.g., sensitivity, value, impacts, effects, significance</p> <p>#Study Area/ Nature of assessment should be determined by the nature of the development</p> <p>#SEA should be dealt with in a completely separate chapter</p>
<p>This needs to make clear to the widest audience the difference between landscape (impact) assessment and visual (impact) assessment. We should be cautious about cumulatives as much cumulative assessment is actually baseline (or variants thereof). The section considering the issues of magnitude sensitivity and significance must illustrate objectively how good design/appropriate location etc can be considered objectively in the assessment. This is particularly relevant for townscape assessment. The issue of valency must be addressed. Reference should also be made to other areas such as Residential Amenity Surveys etc</p>
<p>Methodology and terminology: Baseline: definition of receptors, importance, sensitivity, etc.</p>
<p>1 Defining a study area, where significant effects are likely to occur</p> <p>2 No mention of issue of change which is necessary for an impact to occur</p> <p>3 Guidance on how to establish appropriate levels of sensitivity for different landscape/visual components</p> <p>4 Mitigation - rationale for requirement -clarify that mitigation is measures developed in response to the identification of adverse impacts.</p>
<p>Ensure that landscape impact assessment is defined as covering effects on landscape character, fabric and designations</p>
<p>Effects assessment - incl. temporary effects (eg during construction) also changing impacts of a development over time short/medium/long term eg as mitigatory planting matures</p>

Terminology - distinguish between impact and effect

Need to link to SNH/Countryside Agency guidance and topic papers re methodology/terminology - esp. re sensitivity

Significance - need to guide when an effect becomes 'significant'

visuals, illustrations, GIS etc - say what, when and why to use these

**Chapter 5: The development to be assessed: what do you need to know?**

- *The development process from inception to removal*
- *Description of the development relative to LVIA*
- *Masterplanning and the building-in of mitigation to the development proposal*
- *Summary/checklist*

**Q6. DOES ANY OTHER CONTENT NEED TO BE INCLUDED IN CHAPTER 5: THE DEVELOPMENT TO BE ASSESSED - WHAT DO YOU NEED TO KNOW?**

The LVIA needs to show evidence of an iterative process of siting/design and assessment. If there is no evidence of iteration - i.e. the LVIA appears to have been done on an already completed design process - then unless the proposal happens to have turned out ok, it's a fail in landscape terms. The LVIA report therefore needs a section on working with the design process, showing how landscape objectives have been set out to inform siting and design options (in addition to the development objectives). Showing options and balanced review of the pros and cons of each from a landscape perspective, leading to the selection of the preferred option would be great. Some of this may overlap with the Design and Access Statement - but too many of these statements are more of a justification rather than evidence of how landscape issues have been considered. Design.. Statements are also somewhat physically divorced from the LVIA and in practice that disconnection hinders authorities and statutory consultees from coming to their conclusions on the LVIA.

If you take my points above, we also need guidance for practitioners on how to cope in situations where they have only been appointed after the design process has been completed (eg should they be required to state at what stage they were appointed and how involved they were in the siting and design process?)

We also need pointers a 'lite' version of LVIA for small schemes where it would be unreasonably bureaucratic to subject a domestic scale proposal to the same scope of LVIA as a multi-million pound high impact development. This is so that local authorities have something to ask to support a planning application on LVIA where a full EIA is not required.

Policy guidance should be considered, particularly in relation to scale, as small scale may be considered appropriate for the location but not defined!

This must stress the temporal aspects of the development and the lifetime of this and any reversible elements of this.

Alternative development proposals (might need to be assessed particularly in EIA context)

1 Only need to describe those development features which have a landscape/visual relevance or implications for the assessment.

2 Design development measures, potentially informed by outline LVIA, are not technically mitigation

3 Level of detail available on development proposal will influence level of detail of assessment and robustness of assessment conclusions

Distinction needed perhaps between generalised 'in principle' assessment of a type of development eg housing and assessment of a specific development project.

Long term mitigation e.g. provisions to ensure trees mature (and probably beyond lifespan of development).

S106 agreements and scale of infrastructure funded.

- Site selection/consideration of alternatives is an important consideration in reducing impacts and should be included.

- The site context should also be included as it sets the scene for the proposed development.

Need to identify whether the landscape design is an integral part of the project being assessed or a separate mitigation measure.

Need to identify whether landscape & visual impacts have been mitigated by design, or by adding on mitigation measures

Would be useful to have case studies showing effective mitigation

**Chapter 6: Landscape Impact Assessment (includes townscape and seascape)**

- *Baseline*
  - *Scope (consultations)*
  - *Static (point in time) or evolving*
- *Significance*
- *Mitigation*
  - *Testing effectiveness and validity*
- *Summary/checklist*

**Q7. DOES ANY OTHER CONTENT NEED TO BE INCLUDED IN CHAPTER 6: LANDSCAPE IMPACT ASSESSMENT?**

Can we please have some pointers to baseline as where to find baseline and in what forms it exists, as this varies between different countries and agencies. It won't replace the need for scoping consultations but it should allow for a better scoping report to be prepared in the first place. Also policy contexts differ for each country. To avoid the GLVIA dating, can we arrange for web-based links (say from GLVIA to LI website pages) to remain constant, and then the LI and country agencies, local authorities etc can liaise to make sure there are suitable links and references to their baseline from the LI website?

Scoping potential impacts on setting of historic assets is an issue we see time and again at English Heritage. PPS 5 looks at the historic environment as a whole as well as individual protected heritage assets.

An additional bullet point is required, 'landscape impacts' which need to be clearly demonstrated before moving onto the 'significance' of those impacts.

The value neutral LCA [& HLC]; context of the proposed site.

'Avoidance' [possibly by redesign, alternative form; alternative location] should be considered before mitigation.

There should be a section on the evaluation of sensitivity and magnitude of change before significance and suggested criteria.

Community perception of 'change', in line with ELC

Note previous comments about identifying how good design can be objectively introduced into the assessment without this leading to subjective assessment.

- Baseline desk study, field survey and analysis

- Impact assessment: identification of impacts and magnitude (i.e. before consideration of significance)

- Environmental enhancement (not just mitigation)

- 1 Separate out landscape character and landscape designations as part of baseline/assessment
- 2 Designations - need to assess impact on particular interest which designation is intended to protect.

Magnitude of impact - potential to change over time

Sensitivity/capacity, Topic paper 6

State what receptors are and how to identify the difference between physical landscape fabric and the wider landscape character

link to SNH/Countryside Agency guidance and topic papers

Should include how to assess impact on designated landscapes (e.g. National Park/AONB).

Should cover working with Landmap in Wales.

### **Chapter 7: Visual Impact Assessment**

- *Baseline*
  - *Scope (consultations)*
  - *Static (point in time) or evolving*
- *Significance*
- *Mitigation*
- *-Testing effectiveness and validity*
- *Summary/checklist*

### **Q8. DOES ANY OTHER CONTENT NEED TO BE INCLUDED IN CHAPTER 7: VISUAL IMPACT ASSESSMENT?**

Can we ask photographers not to hide behind an obstacle when they take photos of the site from afar? The ability to see because of obstructions is relevant, but if the photomontage is depicted with the site behind a bush when there would have been a clear view a few metres either side, it rather gives the impression of the study trying to hide the visual impacts!

Similarly we need some better guidance on the pros and cons of view points where the best view (say a hilltop) and the viewpoint that most receptors would see the proposal from (say the foot of the hill on a busy road) are different. The problem of choosing just one or the other is that neither fully represent visual effects on their own, but does that mean we need both view points included?

Visual impact needs to include materials as well as massing and form. Reflective materials and some colours can be very obtrusive.

Views and settings also need to be considered as large scale developments can have far reaching impacts.

An additional bullet point is required, 'visual impacts' which need to be clearly demonstrated before moving onto the 'significance' of those impacts.

Identification of existing visual characteristics; 'Avoidance' [as above]
Needs to cover visual impact assessment from residential properties - when this may be required, what it should cover etc.
There should be a section on the evaluation of sensitivity and magnitude of change before significance and suggested criteria.
Note previous comments about identifying how good design can be objectively introduced into the assessment without this leading to subjective assessment.
<ul style="list-style-type: none"> <li>- Baseline desk study, field survey and analysis</li> <li>- Impact assessment: identification of impacts and magnitude (i.e. before consideration of significance)</li> <li>- Environmental enhancement (not just mitigation)</li> </ul>
Identify different elements of visual assessment - static selected viewpoints/sequential visual assessment etc
Magnitude of impact - potential to change over time
Sensitivity of receptors
State what receptors are and how to identify these

<p><b>Chapter 8: Cumulative Impact Assessment</b></p> <ul style="list-style-type: none"> <li>• <i>Baseline</i> <ul style="list-style-type: none"> <li>- <i>Scope (consultations)</i></li> <li>- <i>Static (point in time) or evolving</i></li> </ul> </li> <li>• <i>Significance</i></li> <li>• <i>Mitigation</i></li> <li>• <i>-Testing effectiveness and validity</i></li> <li>• <i>Summary/checklist</i></li> </ul> <p><b>Q9. DOES ANY OTHER CONTENT NEED TO BE INCLUDED IN CHAPTER 8: CUMULATIVE IMPACT ASSESSMENT?</b></p>
<p>For authorities involved in strategic planning, we need to ensure that GLVIA allows for considering impacts at a strategic planning stage. This is what sensitivity and capacity assessments try to do, and studies that highlight forces for change. Does this kind of work sit within GLVIA or is it something best left for LCA Guidance topic papers? We need to be clear.</p>
<p>The inclusion of a separate chapter on cumulative impact assessment is welcomed. It is particularly important especially with regard to the wind energy industry and wind farms which are getting much larger both in terms of numbers and size.</p>

'Avoidance' before mitigation [as above].

No I'm not sure about mitigation of cumulative effects - as you cannot usually mitigate the effects of other developments, then the main option is to mitigate the effects of the one you are assessing - so surely that is addressed already?

Method and criteria; per recent SNH draft guidance? (Currently much divergence of methodology in this area of study).

See previous comments about cumulative

- Impact assessment: identification of impacts and magnitude (i.e. before consideration of significance)

Distinguish between cumulative landscape and cumulative visual ?

Need to distinguish (perhaps more appropriate in C4 ?) between cumulative effects = additional effects (incremental change to existing context of established/permitted developments) and cumulative = combined effects (totality of established, permitted and proposed developments)

What should be included in this, and what not to include - and how this should be separated from the wider LVIA.

#### **Chapter 9: Visual representation/illustration**

- *Maps, sketches and 2D and 3D diagrams*
- *Computer modelling, visualisations and photomontages*
- *Role of GIS*
- *References to other guidance*

#### **Q10. DOES ANY OTHER CONTENT NEED TO BE INCLUDED IN CHAPTER 9: VISUAL REPRESENTATION / ILLUSTRATION?**

Some examples of both good and bad practice would help. The issue of how large the objects appear in the view, camera lens magnification, viewing distance, print size etc would be helpful. As some guidance already exists eg the SNH guidance for wind farms, do we just refer to that? I think yes, for the technical side, but the GLVIA should usefully contain a digest of experience of practitioners on issues to watch out for. For example, evening and morning sunlight makes wind turbines appear more visually prominent because they contrast more with their background, yet photomontages often depict them with middle of the day lighting. Only experience of practitioners (as opposed to technical guidance) can highlight such issues. Something also needs to be said about DSLR v film camera lens magnifications, they are not the same. Highland Council have a detailed prescription that helps us understand the issues. (too prescriptive for GLVIA to adopt, but helpful content for information).

Views and vistas cones

There are a number of difficulties associated with photographs and photomontages. What the human eye sees is often quite different to a photograph which may not give a true picture of the landscape. Also, the limited numbers of single viewpoints can be misleading and does not give an honest representation of the likely impacts. A computer aided 'drive through' to demonstrate the sequential views might more accurately show the impacts. This should be done over time to demonstrate impacts at different times of the year and in different weather conditions

Should address night time visualisations?

Presume this will include methods for establishing ZTV / ZVI (or is that earlier?). Software?

yes - endorsement of SNH guidance on visualisations and montages

Angles of view - as perceived [eye and brain] rather than as broad mathematical statements; simplification of the photographs in photomontages - many very misleading ones produced currently - and confusing image size and viewing distance need to be clarified.

Video based media such as flythroughs?

Interactive web-based media - e.g images where you can switch the development on/off, see the mitigation planting growing.

Both of these are on the verges of being usable for LVIA illustrations, so it might be worth including them, as in five years time they could be in regular use!

#It should be noted that photomontages may not always be the best method of visual representation and it should be recognised that other methods, such as sketches may be better suited to different types of development.

#Review of current techniques; pros and cons; suitability for different uses; much professional and public debate on this topic at present.

#Examples- perhaps in appendix- to illustrate these.

Videomontage? Especially of 'moving' development such as wind energy

Significant changes are taking place in the field of photomontages which are set to challenge 'best practice' methodologies of some of the current and dominant commercial practitioners in this area. There are also technologies of immersive imaging and augmented reality which offer the end user a more realistic and informative visualisation experience than traditional 2D flat printed material. I do hope that the new guidelines will draw from a wide range of experts in this field who are not just the usual faces with vested interests in keeping a commercial status -quo hold on outdated practices.....

Important to clarify type and level of information required by landscape architects to undertake a professional LVIA and reach judgements on levels of impact/effect, recognising different information may/will be required by public/planners for other purposes

How to carry out versions of ZVI representation for short assessments when fancy software is not at the disposal of the consultant and what value such representations can be given in terms of quality/accuracy? Also, explicit, specific instructions about photomontage creation in the event that a photomontage consultant has never performed the tasks before according to IEMA guidance.

Needs to refer onto specialist guidance for detail unless you want the scale of the publication to be large & poss too expensive - people will want hard copy. also need to cover public display options eg virtual theatre products/setups for PLI's eg of this material

What, when, why and how to make use of these

**Q11. ARE THERE ANY OTHER KEY ASPECTS OF LVIA PRACTICE THAT SHOULD BE INCLUDED IN PART 2, IN ORDER TO PROVIDE COMPREHENSIVE GUIDANCE ON PRINCIPLES AND METHODS?**

I'd find it helpful (as an authority rather than practitioner) to consider both the magnitude of change to landscape before and after, and use the notion of value (perhaps expressed as benefits and services) to inform a judgement of significance. A further stage, of considering the acceptability of these significant changes, should be made with reference to plans/policies/management guidance that set out how the landscape should (and should not) change over time. Specifically, to introduce the concept of whether the proposed changes will move that landscape towards or further away from the desired state as set out in plan/policies/guidelines.

Where does consultation and review fit in?

Do we need to say something on proportionality? LVIA's designed to pick up local issues and costs/expertise relevant to issues?

It would be useful to build in a requirement to review a LVIA after the project has finished including a process of feedback in order that both applicants and local authorities can learn and improve over time.

Will there be examples of LVIA's carried out, especially those with differing brief / scope? Residual impacts?

As mentioned, Landscape Character Assessment should have a much higher and clearer profile, and Historic landscape characterisation also as it is much more useful than 'raw' archaeological / historical data.

Nature of effects (beneficial/adverse) and how to decide.

How to assess landscape sensitivity.

Should the duration of an impact affect magnitude, or should it be recorded separately?

Night time impacts.

Where there are both adverse and beneficial changes to a receptor how should these be reported? Should any 'balancing' be carried out or should they be recorded side by side?

Yes the irreducible minimum of a methodology
The interaction of LVIA and design of the development – iteration
#The inclusion of worked examples or case studies may be helpful.  #There should be a separate chapter on SEA and a separate chapter on Capacity studies, again, both with worked examples.
The objective consideration of the role of design in mitigation without this leading to subjective assessment.  Residential Amenity Surveys
1 The need for the application of professional judgement in aspects of determining levels of impact/effect  2 Transparency and clarity to describing process of assessment
Community consultation - incl. at what stage in project
Reference to other guidance re LVIA, eg DMRB, Env Agency guidance etc  stress relation of assessment to design and to management
Public consultation using glvia products is an important & growing area & needs to be covered well or direction as to where & how to find more guidance on this topic

<b>Q12. IS PART 2 PRESENTED IN A LOGICAL ORDER?</b>
A LVIA practitioner would be better placed to advise on order of the contents as the 3rd edition will be used by landscape practices.
The layout of this new edition is more logical than edition 2 and the methodology is clearer. The inclusion of a separate chapter on cumulative impacts is particularly welcomed.
Generally yes; there may be a need to mention that, eg, presentation / visualisation will be coming up in a later chapter.
We tend to split our assessments into three sections now. Where we used to have landscape/visual, we now have character/visual/designated landscapes. The reason we do this, is that we consider effects on designated landscapes by firstly looking at effects on their character, and visual effects on them, and then seeing whether these add up to effects on the special qualities and purposes of designation. This means we need to have done character and visual before we move on to the designations. As most people structure their text in the same order as the GLVIA presents it, it might be worth thinking about whether to create a character/designations split.
Yes=10   No=0   no response=13

## Appendices

### Q13. IS THERE ANY ADDITIONAL MATERIAL YOU WOULD FIND USEFUL TO HAVE INCLUDED AS APPENDICES?

A copyable checklist of what an authority or planning officer needs to consider at scoping of an LVIA and what to judge an LVIA received in terms of. It would be the sort of checklist guidance that would be given to all planning staff in a public authority to help them decide which proposals they should farm out to their internal landscape specialists. A general criticism is that planners do not always pick up on which cases they need help with, from the landscape specialist.

Please include English Heritage publications in the references to help foster wider use of the 3rd edition by the historic environment sector,

Given the large numbers of windfarms presently being constructed/which have been constructed in Northern Ireland it would be useful to use windfarms as one of the examples.

More detail on good practice for wind energy appraisals as examples

Good practice guides

Terminology / criteria; checklists? sources of information

The comparative image sizes, lenses, and angles discussed in [thevisualissue.com](http://thevisualissue.com)

Case studies, methodologies

Photographs to explain each concept that is being described. Examples of before and after, proposed and actual. A definitions section that makes clear where the definitions came from, and if possible standardise the definitions with one document rather than make a new one up from perhaps three others.

You haven't said what these will contain! I think the appendices should perhaps be online content, then they could be useful examples of different assessments and graphics, updated on a regular basis. A well-maintained online bibliography with links to other documents would be very useful too.

Debatable whether illustrative worked examples/ case studies should be in text or appendices.

Potential for including specific case studies to be considered.

Examples of good practice

Photographic specs for glvia illustrations LI current BP technical note? & issues to do with realistic images or otherwise need to be discussed somewhere

## General

### Q14. DO YOU HAVE ANY OTHER GENERAL COMMENTS ON THE BASIC STRUCTURE AND CONTENT OF THE REVISED EDITION?

Even if the technical parts are a priced published document, the lay person's parts and checklists for non practitioners on scope etc and glossary of terms, should be made free to download from the LI website.

My preference is for the entire work to be made free to download from the LI website as making it a priced publication is rather an anachronism and inconvenience these days where just about everything else is available on-line at the click of a button. By all means make a charge for printed versions, if you think they are really needed these days, and you have the luxury of being able to afford to print them.

My primary concern is the current structure of the Guidelines. The revised document must be coherent and fixed to a logical pattern. For example, why is 'Baseline studies' that states 'The initial step in any landscape or visual impact assessment...' Part 6 of the document? The guidance should read in a logical order related to the process and as written by one author.

Help and guidance for local authority officers would be useful as to how best to assess LVIA's with regard to their validity and accuracy and test the modelling. They need 'tools' to help them demonstrate inadequacies and misrepresentation in LVIA's which will stand up to scrutiny at appeals and public inquiries.

Sounds good - keep it concise

No it seems to be quite logical, well set out and robust

Ecosystem services is a fundamentally confusing term as it is not related to ecosystems [I write as one who initially graduated in ecology]. The 'services' approach is relevant and valid, however that should be consider independently of the ecology and ecosystem information. Furthermore, by focusing on 'ecosystem services' there is the real danger that other services are omitted. A 'landscape functions' approach could be more inclusive as well as being more appropriate to a landscape tool / process / publication.

Early days for substantive comment; await more detailed drafts.

Clear advice re scale and appropriateness

Only as noted above.

Seems fine - use of graphics will need to be carefully considered to demonstrate points clearly