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LPA REF. | 17/04673/OUT
DATE | JUNE 2021
PPG REF. | P19-2172.011



LANDSCAPE AND VISUAL REBUTTAL

**OF BRIAN JOHN DENNEY BA (HONS), DIPLA, FLI, CENV,
MIEMA**

**IN RELATION TO LANDSCAPE AND VISUAL MATTERS
CONCERNING:**

**AN OUTLINE PLANNING APPLICATION FOR THE
ERECTION OF UP TO 85 RESIDENTIAL DWELLINGS
(*REDUCED FROM 93 ORIGINALLY*) AND OPEN SPACE
(17/04673/OUT)**

ON

**LAND AT JUNCTION WITH CARR ROAD, HOLLIN BUSK
LANE, SHEFFIELD, S36 1GH**

PREPARED ON BEHALF OF HALLAM LAND MANAGEMENT LIMITED

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DESIGN ENVIRONMENT PLANNING ECONOMICS HERITAGE

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1. I have reviewed the evidence of Sheffield City Council's Landscape witness, Mr Ricardo Ares. In doing so, I notice several points which are wrong which are contained within the visual material provided by Mr Ares. I address these matters of fact initially and provide subsequently further points which relate to Mr Ares' Proof of Evidence.
2. The appendices to Mr Ares' Proof of Evidence contain a number of site photographs (Appendix A), additional visual receptors including a location plan and supporting photography (Appendix B) and an amended Representative Visual Envelope (RVE) (Appendix C). I take each in turn as follows:

Site photographs (Mr Ares' Appendix A)

3. I provide at Annexes 1 to 3 to this rebuttal the series of site photographs provided by Mr Ares within his Appendices A and B, upon which I provide additional annotations and / or visual material from the LVA, in order to ensure the Inspector has a full understanding of the nature of the site, its context and the extent of proposed development within it.
 - *Photo 1* – I provide the extent of proposed built development.
 - *Photo 2* – I provide annotations which identify that the part of the site across which the view extends, is in fact those areas proposed to be partly free of built development which include the Public Open Space and the western field within which ecological and biodiversity improvements are proposed. The areas proposed for built development extend to the right-hand side of the view. In referencing this view within his Proof of Evidence, Mr Ares does not acknowledge that there are also settlement areas both within the view and immediately adjacent to the viewpoint. Indeed there are properties further up the hillside behind the viewer and all the way down Carr Road. Mr Ares also states at his paragraph 3.8, that '*when viewed from the south and east (along Hollin Busk Lane) it is not possible to discern the main built form of Stocksbridge from the areas to the north or the east of the site*'. It should be noted, that, as shown within Mr Ares' Photograph 2, settlement is visible to the western end of Hollin Busk Lane as well as further north and this is an important element of the landscape/townscape character when travelling from east to west along Hollin Busk Lane, as set out at Table A3.1 (CD6.18, Appendix 3).
 - *Photo 3* – Mr Ares' Photo 3 depicts a relatively narrow field of view which excludes wider context in which the site is actually seen. The image cut line which I have

marked on Mr Ares' photo 3 relates to that on my own photo which shows that the site is seen within the context of other existing residential properties immediately to the right of Mr Ares' photograph, but which he has chosen to exclude. His photograph appears to be from within the site itself.

- *Photo 4* – At Mr Ares paragraph 3.11, he describes that there are a number of 'prominent viewpoints of the development site' within Fox Glen. I consider this description does not correctly describe the nature of the visibility from within Fox Glen. By virtue of its nature as a wooded, narrow valley, 'glen', to describe the limited opportunities for views beyond a) the woodland and b) the sloped sides of the glen, is to overstate the degree of visibility and its potential prominence. This photograph appears to have been from a position off the surfaced path and some way up the embankment and is not representative of how the site would be seen by users of the footpaths within Fox Glen. I provide the viewpoint photography from viewpoint 6 within the LVA, within which the footpath and level change at this location can be seen. The sign which is visible in Mr Ares' photo 4 is seen within the LVA viewpoint 6 image and the proximity of the timber fencepost and sign indicate that the photo provided by Mr Ares is not a representative view into and across the site from this location.

Additional visual receptors including a location plan and supporting photography (Mr Ares' Appendix B)

4. Mr Ares sets out at his paragraph 6.48, that '*the site is very clearly visible from the northern side of the Stocksbridge Valley*'. To be clear, the LVA does identify and assess the visual effects from receptors to the north of the valley (receptors G (Public Right of Way users) and K (highway users) are represented by viewpoints 9 and 13). It is indeed agreed within the Statement of Common Ground that all thirteen viewpoints within the LVA are representative of views towards the site from locations within the surrounding area (CD6.8, para 5.14). It is also agreed that the visual effects for receptors G and K are no greater than Minor (CD6.8, para 5.17). It is unclear therefore to what real point the additional views from the locations selected by Mr Ares, is intended to make. Nonetheless, I provide clarification and additional annotations at my Annex 1, 2 and 3 and to be viewed alongside my commentary as follows:
 - Mr Ares describes at his paragraph 6.49, that clear views '*extend as far as Carr Head Farm (Photo S1)*'. This is not the case and Mr Ares has mis-identified the site within the view available from this location. He has focussed on another site

altogether. Mr Ares has overlooked that the computer-generated Zone of Theoretical Visibility (ZTV) at Figure 8 of the LVA, does not show theoretical visibility at this location. I provide the relevant extract of the ZTV at my Annex 2. I also provide annotated mapping and photography which shows that, by reference to other distinctive elements within the view, the appeal site is indeed, screened from view by the landform upon which the property at Avice Royd is located.

- For each of Mr Ares' additional viewpoints, I provide at my Annex 2, my own photography, undertaken and presented in accordance with Landscape Institute Technical Guidance Note (TGN) (CD7.6). Mr Ares sets out within his evidence text at paragraphs 6.57 – 6.59, his considerations of importance of following best practice guidance, as set out in the TGN. Despite the importance of this, and stating within the introductory page of Appendix B, the photography for each view has not been presented to the dimensions set out in the guidance, which states at Table 3, that the image size should be 390 x 260 mm (CD7.6, page 17). The difference can be seen by a comparison of my images and those of Mr Ares which are contained at my Annex 2. Each of Mr Ares' single images from his camera, have been cropped to the top and bottom, reducing the vertical field of view from the 27° set out in the guidance at Table 3. The cropping has resulted in the images reading as a panorama, most importantly omitting the foreground landscape between the viewer and the wider landscape, which places unnatural focus upon those parts of the landscape which remain visible and invariably the landscape of the site. This approach focuses the viewer's attention on part of the available view and does not provide sufficient context. In making landscape and visual judgements, context is very important. Photographs are an aid memoir and helpful to those reading an assessment, but judgements are made on site and with the full landscape and townscape taken into consideration. Visualisations can also a useful guide and tool, but where used they should also be an aid to assessment at the viewpoint and not in isolation, as they also cannot provide sufficient context when used on their own.

Amended Representative Visual Envelope (RVE) (Mr Ares' Appendix C)

5. Mr Ares suggests at his paragraph 3.15, that an area of the northern valley side should be included within the RVE. He describes that open and clear views are available and that these areas include amongst other locations, the A616 Stocksbridge Bypass, however I note that this highway is excluded from his Amended Representative Visual Envelope (ARVE) at Appendix C of his evidence.

6. I provide at my Annex 3, an overlay of Mr Ares' ARVE. This overlay includes the extent of the areas of theoretical visibility as depicted within Figure 8 of the LVA. This clearly depicts that a considerable part of the landscape indicated by Mr Ares, as having clear visibility of the site, lies outside the ZTV. This may relate to the incorrect identification of the site location from Mr Ares viewpoint location S1.
7. My version of the ARVE plan also includes the locations of Mr Ares' remaining five viewpoints alongside those assessed within the LVA. This shows that all of these locations are broadly within the same landscape and at similar distances from the site (between approximately 1.18 km and 1.8 km) and have been assessed in the LVA and were considered by the Council's officers when the two recommendations to approve were drawn up.
8. Mr Ares describes at his paragraph 3.15, that he believes the areas to the northern valley side, should be included within the RVE. He implies they have been missed. This is not the case. The LVA addresses the potential visibility from the northern side of the valley and this can be seen at Paragraphs 8.2, and 8.15 of the original LVA. The LVA identifies that '*views may potentially occur outside the RVE (such as receptors as Hunshelf Bank, for example)*' (CD6.18, Appendix 1, para 8.2), and it is not the intention of the RVE to set out every potential location where there may be some visibility. The LVA looked at views and potential views from the northern side of the valley and exercised judgement about their inclusion in the assessment based on an understanding of the degree and nature of what may be seen and the context in which it would be perceived. These views were not therefore over-looked and representative views were included. Table C of the LVA sets out an assessment for views on the northern side of the valley and sets out the reasons for the potential effect being minor to negligible. The note set out on Figure 9 of the LVA also recognises that there will be views from outside the Representative Visual Envelope, but explains why all such views are not included, due to the limitations on visibility or what may be seen.
9. In relation to this, Mr Ares describes at his paragraph 6.37, that '*the selection and extent of visual receptors does not constitute an accurate reflection of the areas from which the development will clearly be visible*' and goes on to state that '*the incompleteness of this baseline has led to the omission from the LVIA of a number of visual receptors that will experience adverse effects*' however, at paragraph 6.41 identifies that '*it is not possible to include every possible view available to receptors,*

so representative viewpoints are the most effective way of assessing likely change to visual amenity'. I confirm that receptors located at Hunshelf Bank were fully assessed in the LVA, the assessments of which are set out at Appendix C of the LVA (CD6.18, Appendix 1). These receptors have not been omitted and indeed, the Council's Landscape Architect acknowledges their inclusion within his response (CD2.10, 'visual impact' bullet 1). The statement of Mr Ares at his paragraph 6.47 and 6.49, that such viewpoints / receptors '*have been removed*' from the RVE on the basis that views would be blocked, is clearly not the case.

10. In the Committee Report (CD 1.7), the Council's Officer acknowledges that all queries relating to the assessment that had been raised in earlier correspondence had been satisfactorily addressed.

Other matters within Mr Ares' Proof of Evidence

11. At his paragraph 3.3, Mr Ares describes the sites character, stating that it is 'typical' of the pastoral uplands of this part of Sheffield, as described within the Sheffield Preliminary Character Assessment (CD7.2). He does not give any acknowledgement of the site's settlement edge and partially suburban context, or the influence of the adjacent land uses upon the character of the site or the local landscape. In describing the site as feeling part of the open countryside, Mr Ares refers to his Appendix A, photograph 1, where he describes that the site is visually contiguous with the adjacent Green Belt land with the Peak District in the background. This takes a narrow view of the context and character of the site as well as the character differences between the site and the wider landscape. Green belt is not a landscape designation and is not designated in relation to landscape value, character, or quality. The site and the wider land to its west, is not included within the Green Belt, nor within any designation relating to landscape quality.
12. In relation to landscape character, Mr Ares describes at his paragraphs 4.12 to 4.15, the two landscape character documents which provide descriptions of the landscape of which the site forms a small part. The Council agree that the site and its wider landscape is not a 'valued landscape' in the context of the NPPF (SoCG CD6.8, para 5.12) and although Mr Ares reproduces extracts of the Sheffield Preliminary Landscape Character Assessment (SPLCA) (CD7.2) and the Peak District Landscape Strategy and Action Plan (PDL SAP) (CD7.4), it should be noted that the scope of the SPLCA, as set out at page 12, sets out that the document does not comprise a

full assessment of landscape character and in particular, states that *'it was not felt appropriate at this stage to attempt to make judgements about landscape quality and value'*, going on to state that *'it would be inappropriate to make such crucial value judgements without the full picture which a complete Landscape Character Assessment would provide'*. The Character Assessment (CD 7.2) does not assess landscape value, nor does it attribute value to the landscapes it describes. It is agreed in the SoCG and by the Park Authority and Natural England that the proposals do not harm the National Park

13. When considering Sheffield UDP Policy LR5 Mr Ares, at his paragraph 6.8 sets out that he considers the supporting text to the policy, (rather than the policy wording itself), supports his judgement of the site as being of high value, rather than medium value as considered both by myself and within the LVA. Such a conclusion does not take into consideration all the factors relevant to landscape value, but places emphasis upon certain limited aspects of the site's characteristics. This does not justify or confirm a judgement of high value. In this regard it should be noted that it is agreed between the parties that it is not a valued landscape nor is it designated in relation to landscape value or quality.

Considerations against GLVIA Box 5.1

14. Mr Ares provides at his paragraphs 6.11 to 6.19 his considerations of the site's local landscape against the headings at Box 5.1 of the GLVIA (CD7.5), however I note that he does not provide considerations of 'rarity' or 'associations', which are two headings set out at Box 5.1 and to which I have provided consideration at Appendix 2 of my evidence. In this regard his assessment is partial and not complete which will effect the outcome of his assessment.
15. Regarding landscape quality (condition), Mr Ares places considerable emphasis upon the specific landscape elements which are present within the landscape character area referred to within the SPLCA, thereby making the landscape one which is 'typical' and which he says is not degraded and therefore 'in very good condition'. This is also a partial assessment, too narrowly focused to be objective. Even disregarding the suburban edge to the settlement, the idea that being similar to other nearby landscape that itself is not designated or recognised for its quality does not make this landscape of high quality. Similarly that the landscape has not been degraded does not either.

16. In relation to scenic quality, at Mr Ares' paragraph 6.12, he suggests that the landscape of the site and its surrounding landscape is indistinct from its wider landscape, that which includes the Peak District National Park and land within the Sheffield Green Belt. The Green Belt designation is not an indicator of scenic quality, and it would be rather extreme to suggest the site expresses the Special Qualities of the National Park. It is distinct from the wider landscape in that it is on the urban edge and partially contained by urban form and the character influences of this location, in a way that the wider landscape is not.
17. Regarding representativeness, Mr Ares again places emphasis upon those specific landscape elements which are present within the landscape, as referred to within the SPLCA in isolation of any other factors relating to the degree to which the landscape is representative of the landscape type described within the SPLCA (which extends across a much broader tract of land), as depicted at Figure 5 of the LVA (CD6.18, Appendix 1). Again, this is a partial approach to the assessment.
18. It is agreed within the Statement of Common Ground that the site and local landscape is not a 'valued landscape' and that the site and its adjoining landscape attract no designation or identification in the Development Plan relating to landscape value or quality. (CD6.8, para 5.12). There is considerable tension between this and Mr Ares' conclusion that the site and its immediate landscape is of high landscape value even when viewed purely in a local context.

Sensitivity of Visual Receptors

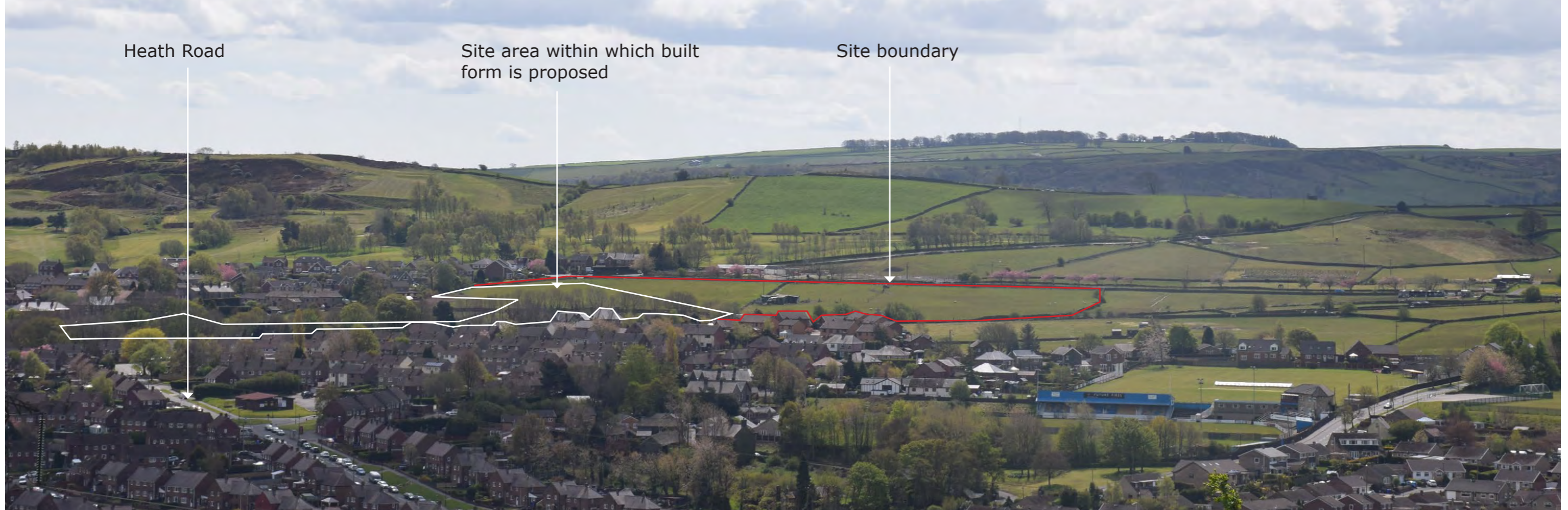
19. Mr Ares suggests at his paragraph 6.51, that '*a number of obvious receptors have been omitted*' from the LVA and goes on to provide an example of visual receptor 'J' (highway users of Carr Road) who are assessed in the LVA as being of medium to low sensitivity. Those using public rights of way, such as walkers, are often assessed as being of high sensitivity when engaged in a leisure activity where they are likely to have a focus on the landscape, but this sensitivity should not be automatically attributed to all receptors on pavements. The LVA rightly considers the nature and context of the path, including its position adjacent to a road linking urban areas of the settlement and its suburban character (tarmac, adjacent to traffic, street lighting and close to the urban edge) alongside the likely expectation of the receptors. The LVA has therefore made an appropriate judgement in this regard.

20. I have already commented on the only other visual receptor point made by Mr Ares; the views from the northern side of the valley, above.

ANNEX 1

REPLICATION OF MR ARES' APPENDIX A WITH FURTHER ANNOTATION AND BUILT DEVELOPMENT AREA OUTLINED

Photo 1 - looking North from Huntshelf Bank, the site is located centrally, visually contiguous with the adjacent Green Belt land. The Peak District sits in the background



Above is Mr Ares' Photo 1, to which I have added three annotations and a white outline of the area of proposed built form.



Above is Mr Ares' Photo 2, to which I have added four annotations and a white outline of the area of proposed built form within the site.

Photo 3 - looking north-east across the site, Fox Glenn is in the middle distance



Above is Mr Ares' Photo 3, to which I have annotated Royd Cottage and indicated a dashed cut line denoting the join with my photograph below.



Above is my photograph to which I annotate Royd Cottage and indicated a dashed cut line denoting the join with Mr Ares' photo above showing the presence and proximity of built development to the right of the view.

Photo 4 - looking North across the site from Fox Glenn footpaths



Above is Mr Ares' Photo 4, to which I have annotated the sign within the site which is also visible on the below photograph from the LVA (viewpoint 6).

Site's northern boundary

Public footpath



Above is the photograph within the LVA (Viewpoint 6), upon which I have annotated the sign which is also in Mr Ares' photo 4 above.

ANNEX 2

REPLICATION OF MR ARES' APPENDIX B WITH FURTHER ANNOTATION AND BUILT DEVELOPMENT AREA OUTLINED, PEGASUS PHOTOGRAPHY AND SUPPORTING MAPPING

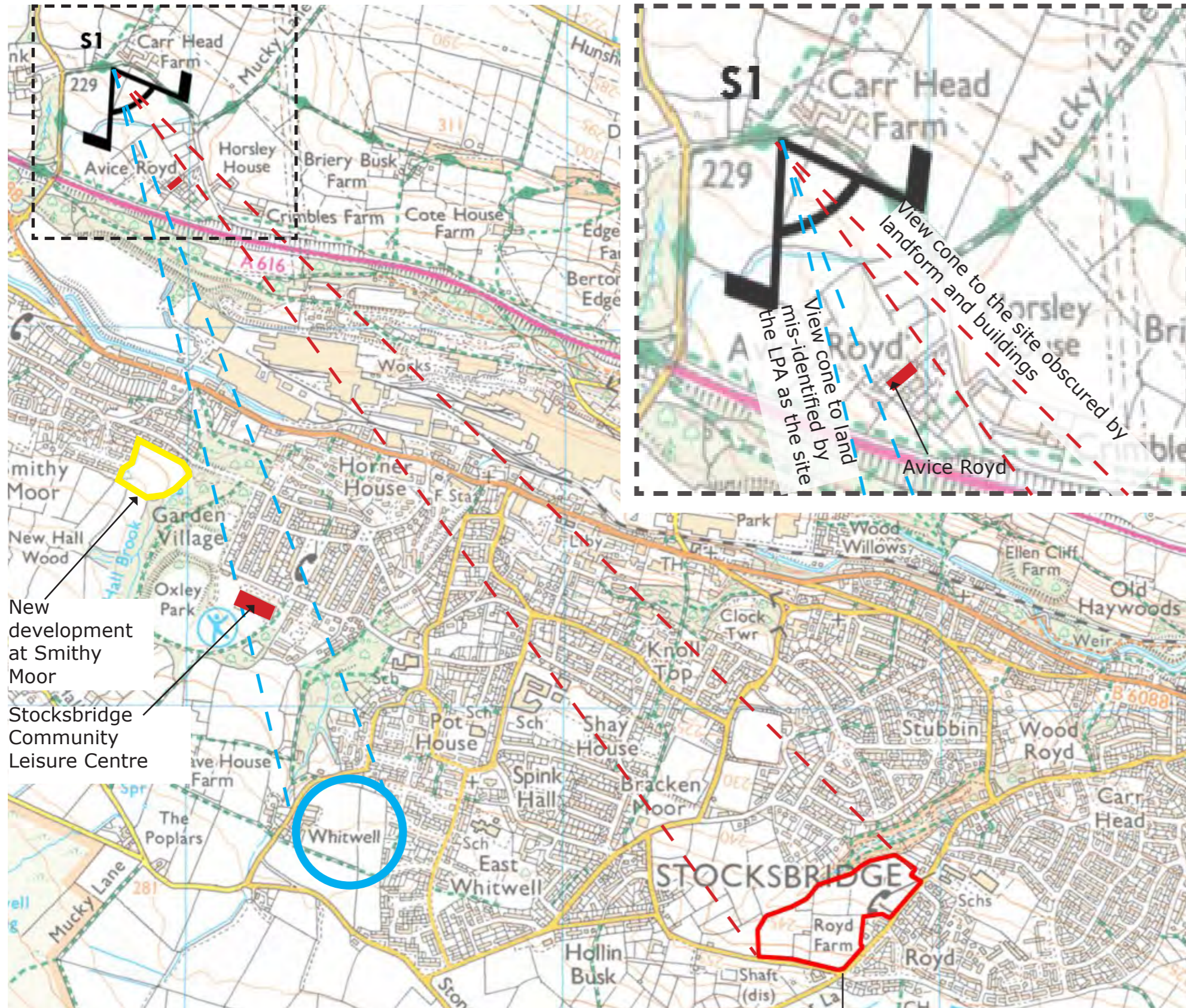
VIEW S1

From PROW at Carr Head Farm



Above is Mr Ares' Photo from his viewpoint S1, to which I have annotated Avice Royd, Stocksbridge Community Centre and new development at Smithy Moor.

Below is Mr Ares' viewpoint location plan, upon which I have annotated Avice Royd, Stocksbridge Community Centre and new development at Smithy Moor. I also add view cones to the appeal site (dashed red lines) and view cones to the land mis-identified as the site by Mr Ares. I provide also, an enlarged extract depicting the view cones in relation to Avice Royd.



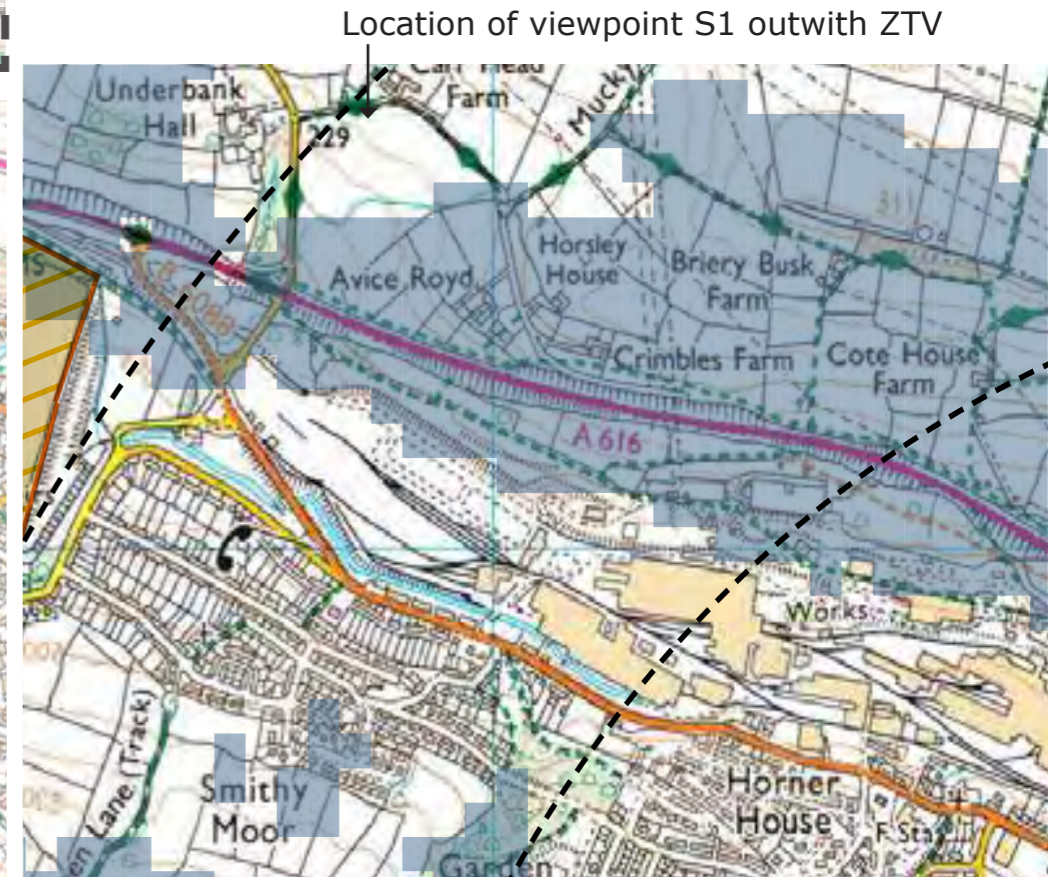
New development at Smithy Moor
 Stocksbridge Community Leisure Centre

Proposed Development Site

Stocksbridge Community Leisure Centre



Above is Mr Ares' Photo from his viewpoint S1, to which I have annotated Avice Royd, Stocksbridge Community Centre and new development at Smithy Moor.



Above is an extract from Appellants ZTV (LVA Figure 8 - Brian Denney Appendix 1) showing the screening effect of landform upon which Avice Royd is located, upon which I provide an annotation of the location of Mr Ares' viewpoint S1.



Approximate location of site screened by landform

Avice Royd

East Whitwell

Stocksbridge Community Leisure Centre

Whitwell



Camera make & model - Canon EOS 5D Mark III
 Lens make & focal length - Canon EF 50mm, f/1.4 USM
 Date & time of photograph - 18.05.21 @ 14:25
 OS grid reference - 25779E, 99685N

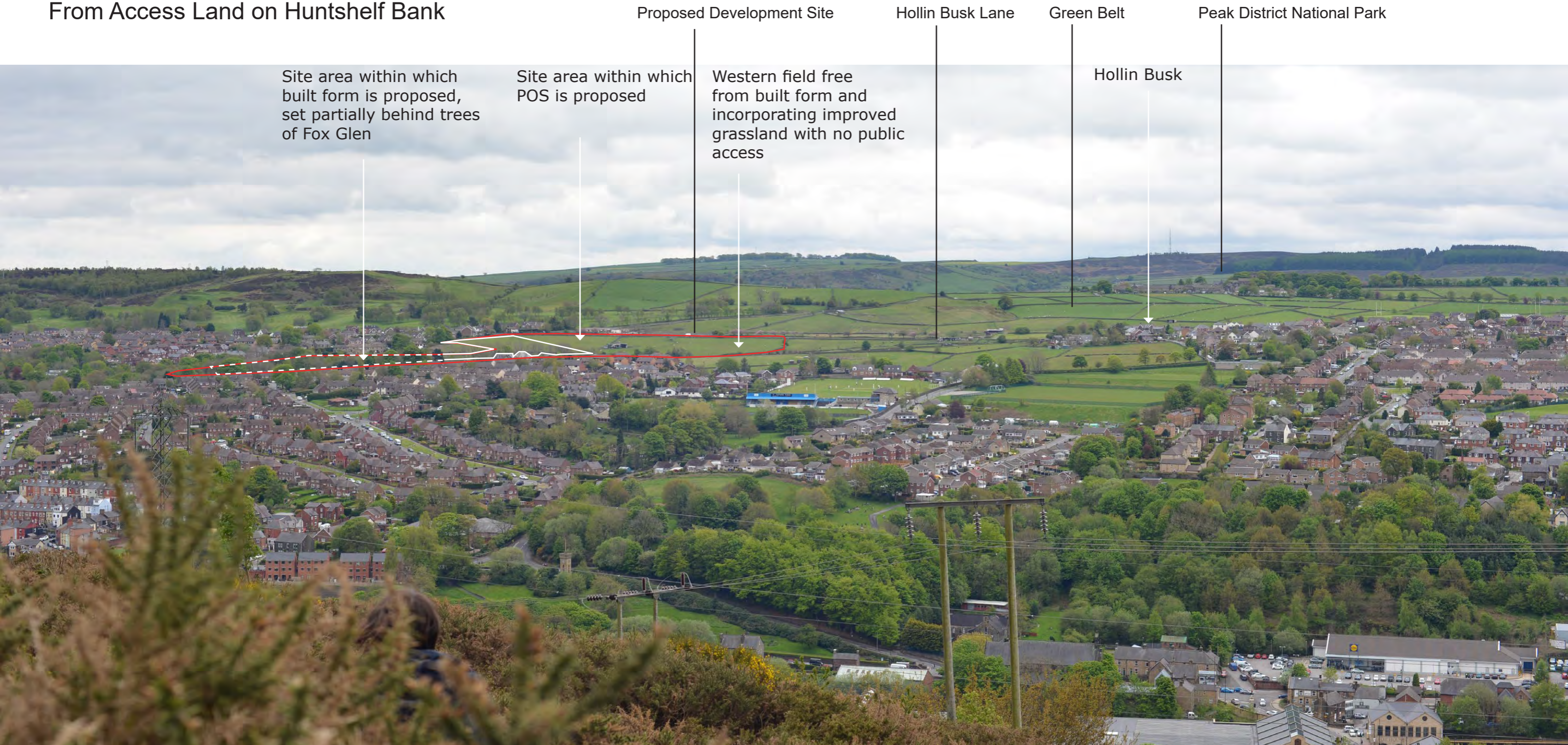
Viewpoint height (AOD) - 237 m
 Distance from site - 2.83 km
 Projection - Planar
 Enlargement / Sheet Size - 100% @ A3

Visualisation Type - Type 1
 Horizontal Field of View - 39.6°
 Height of camera AGL - 1.5m
 Page size / Image size (mm) - 420 x 297 / 390 x 260

My photo from Mr Ares' viewpoint S1 with my annotations

VIEW S2

From Access Land on Huntshelf Bank



Site area within which built form is proposed, set partially behind trees of Fox Glen

Site area within which POS is proposed

Western field free from built form and incorporating improved grassland with no public access

Hollin Busk

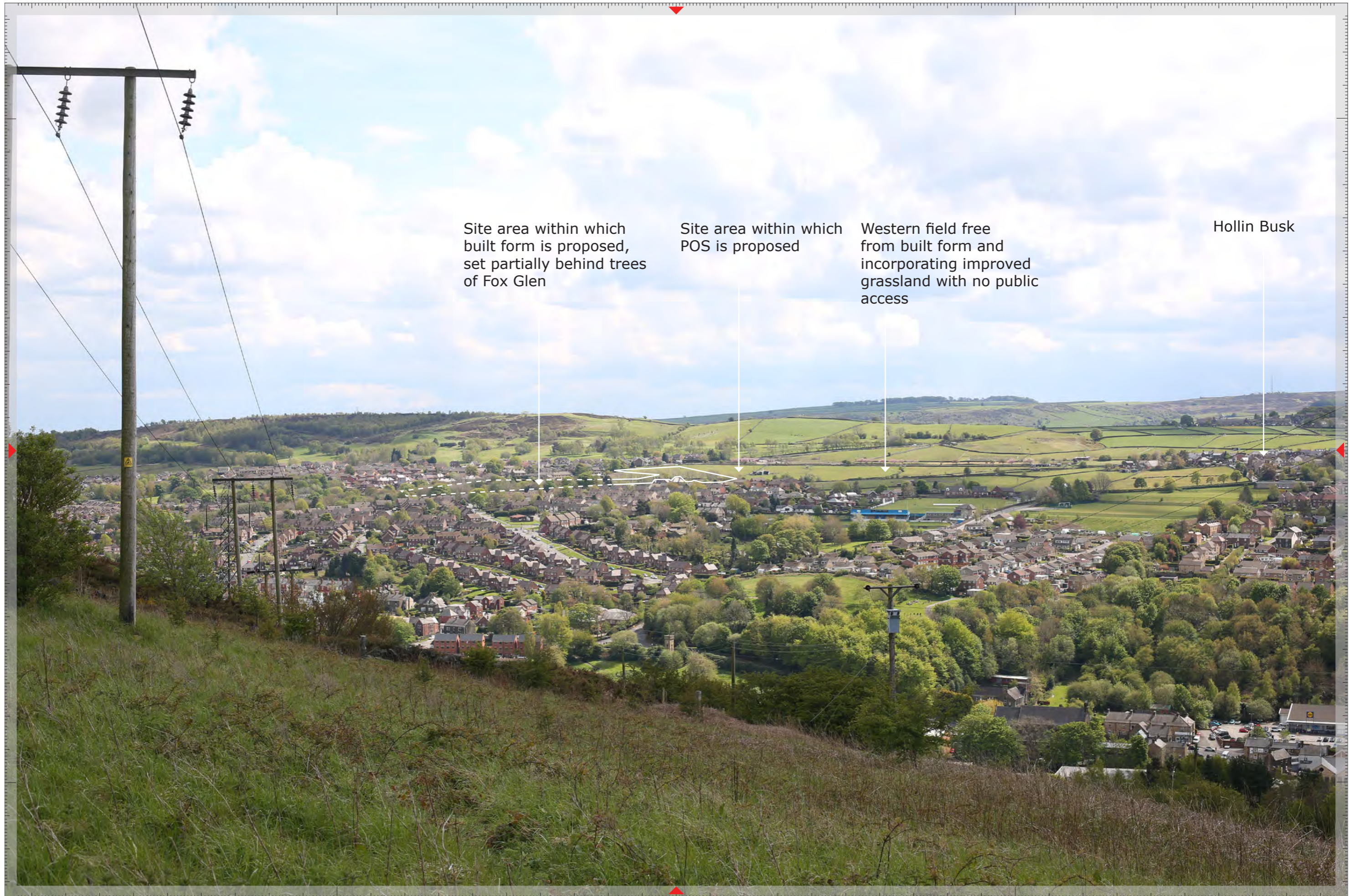
Proposed Development Site

Hollin Busk Lane

Green Belt

Peak District National Park

Above is Mr Ares' Photo from his viewpoint S2, to which I have added four annotations and a white outline of the area of proposed built form (dashed where set behind trees).



Site area within which built form is proposed, set partially behind trees of Fox Glen

Site area within which POS is proposed

Western field free from built form and incorporating improved grassland with no public access

Hollin Busk



Camera make & model - Canon EOS 5D Mark III
 Lens make & focal length - Canon EF 50mm, f/1.4 USM
 Date & time of photograph - 18.05.21 @ 15:00
 OS grid reference - 27382E, 99182N

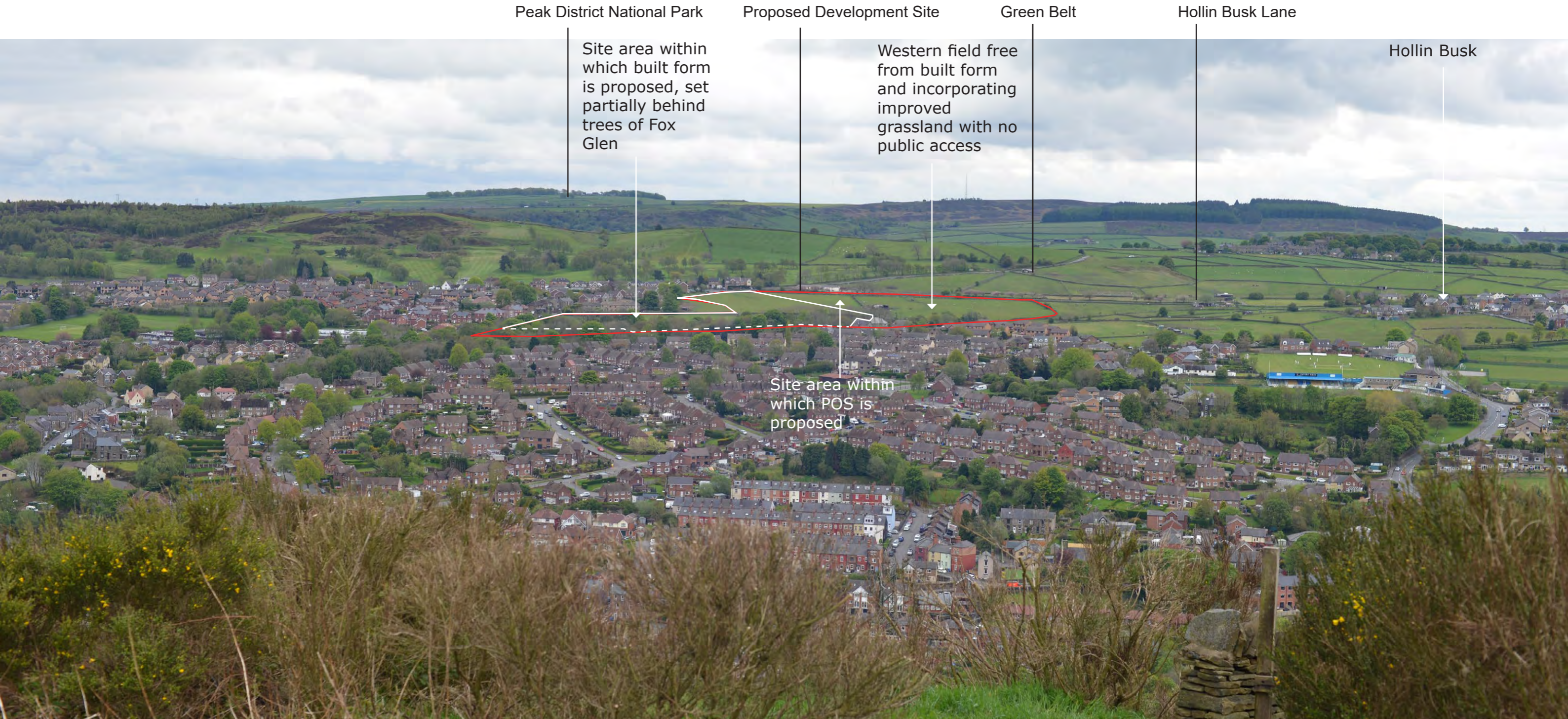
Viewpoint height (AOD) - 284 m
 Distance from site - 1.65 km
 Projection - Planar
 Enlargement / Sheet Size - 100% @ A3

Visualisation Type - Type 1
 Horizontal Field of View - 39.6°
 Height of camera AGL - 1.5m
 Page size / Image size (mm) - 420 x 297 / 390 x 260

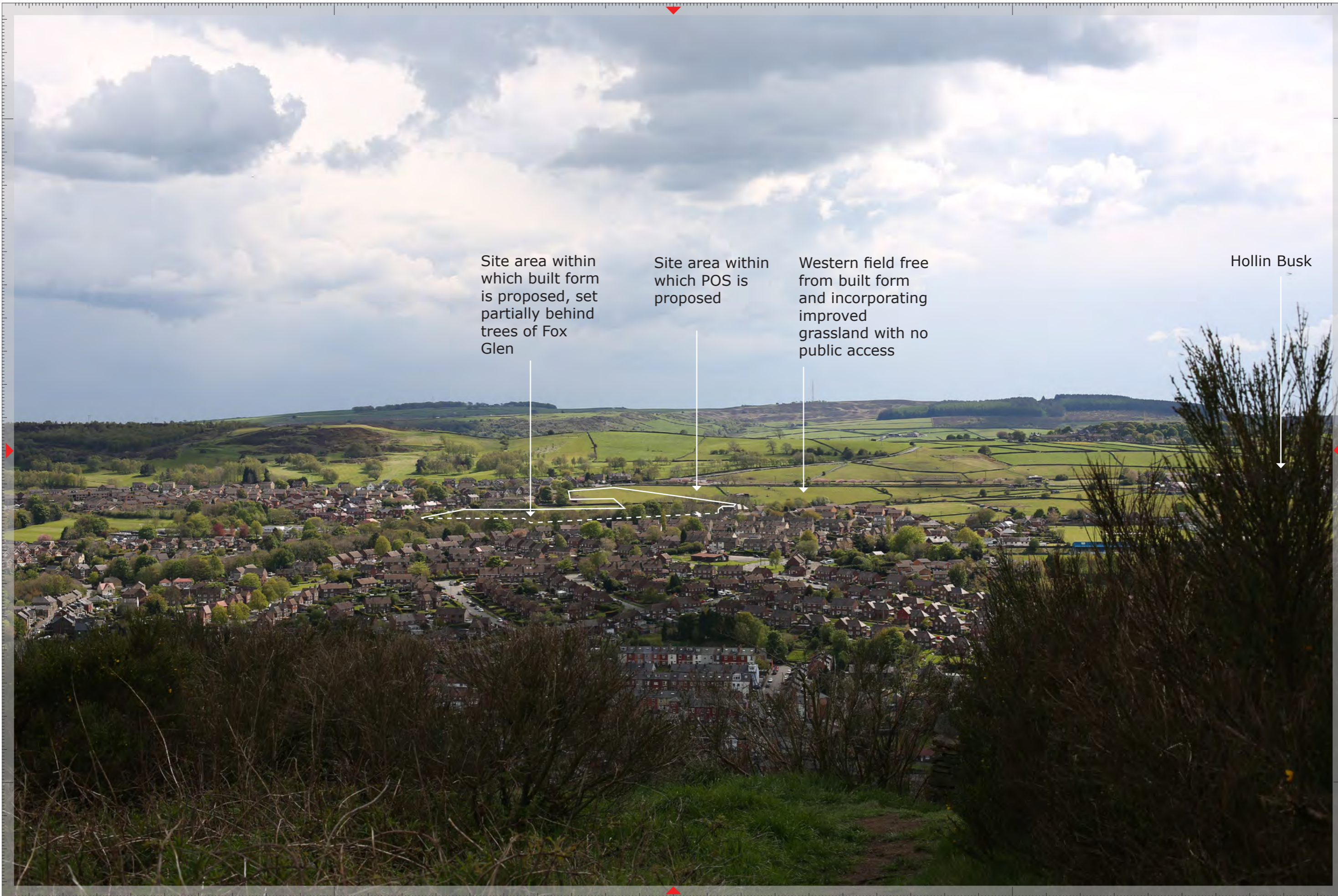
My photo from Mr Ares' viewpoint S2 with my annotations and a white outline of the area of proposed built form (dashed where set behind trees).

VIEW S3

From Isle of Skye Panoramic Viewpoint



Above is Mr Ares' Photo from his viewpoint S3, to which I have added four annotations and a white outline of the area of proposed built form (dashed where set behind trees).



Site area within which built form is proposed, set partially behind trees of Fox Glen

Site area within which POS is proposed

Western field free from built form and incorporating improved grassland with no public access

Hollin Busk





Camera make & model - Canon EOS 5D Mark III
Lens make & focal length - Canon EF 50mm, f/1.4 USM
Date & time of photograph - 18.05.21 @ 15:40
OS grid reference - 27958E, 99014N

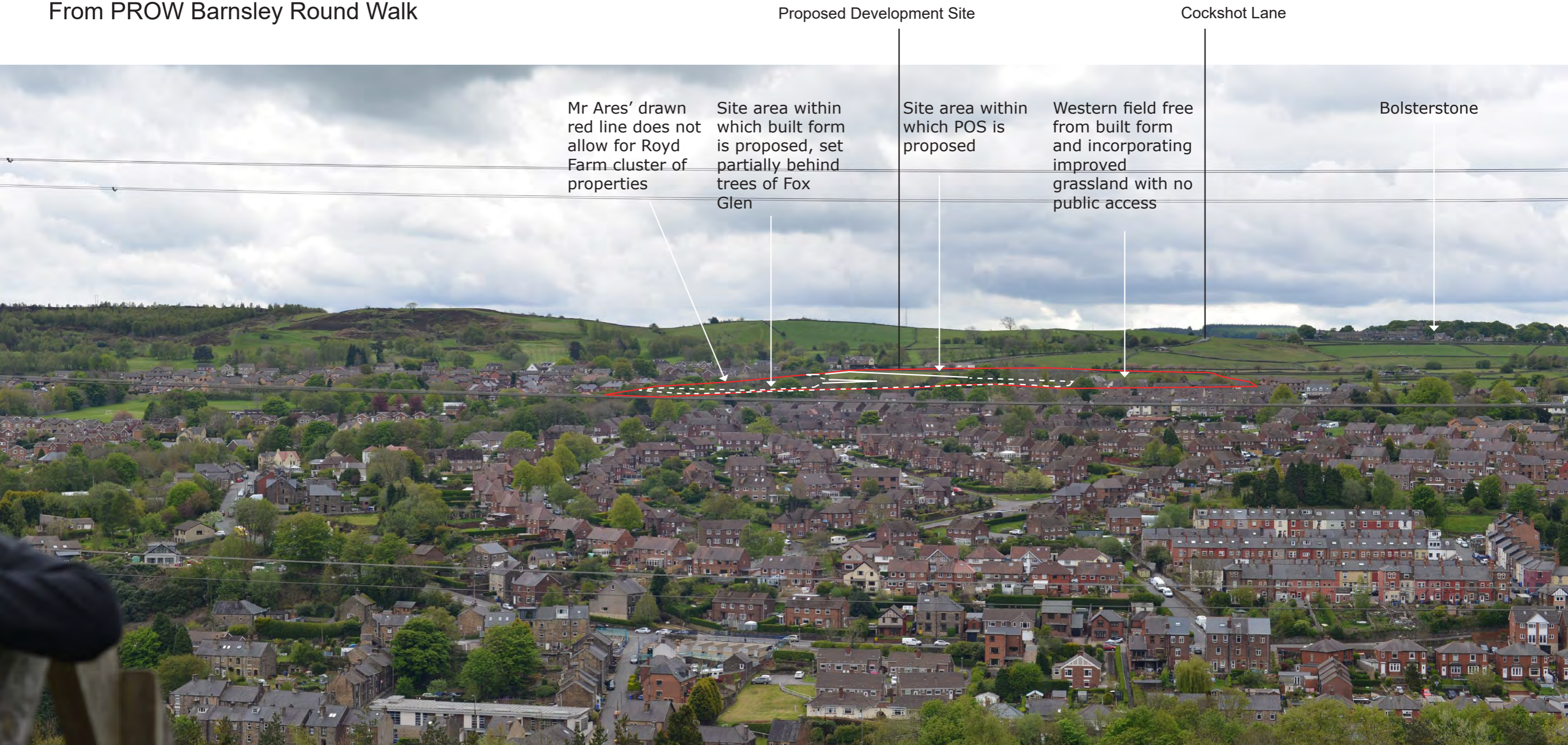
Viewpoint height (AOD) - 297 m
Distance from site - 1.41 km
Projection - Cylindrical
Enlargement / Sheet Size - 100% @ A3

Visualisation Type - Type 1
Horizontal Field of View - 90°
Height of camera AGL - 1.5m
Page size / Image size (mm) - 420 x 297 / 390 x 260

My panoramic photograph from Mr Ares' viewpoint S3 at the Isle of Skye viewpoint looking East-South-East to South-South-East to convey the breadth of far reaching views from this location and the comparative small scale of the site in this context.

VIEW S4

From PROW Barnsley Round Walk



Mr Ares' drawn red line does not allow for Royd Farm cluster of properties

Site area within which built form is proposed, set partially behind trees of Fox Glen

Site area within which POS is proposed

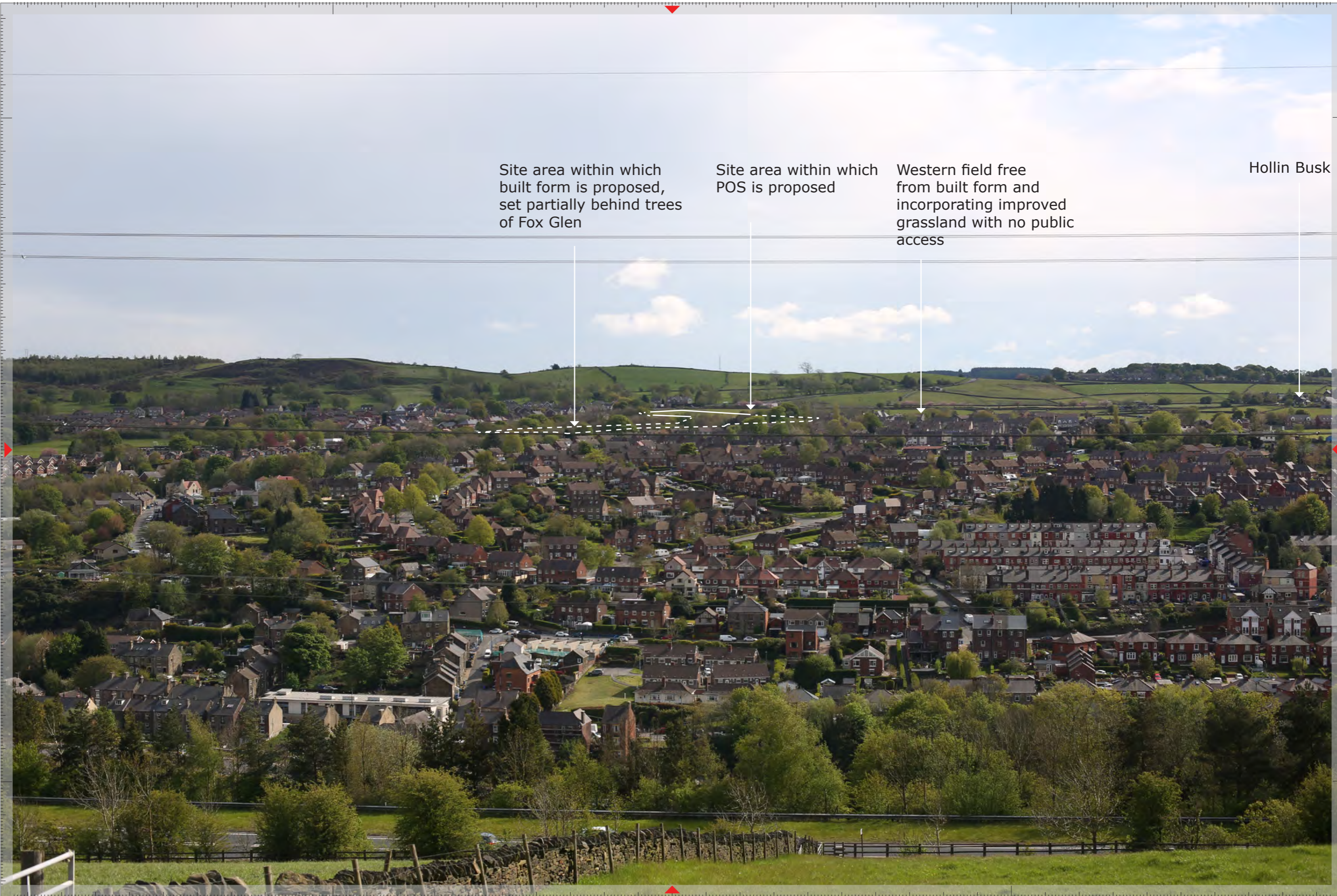
Western field free from built form and incorporating improved grassland with no public access

Bolsterstone

Proposed Development Site

Cockshot Lane

Above is Mr Ares' Photo from his viewpoint S4, to which I have added five annotations and a white outline of the area of proposed built form (dashed where set behind trees).



Site area within which built form is proposed, set partially behind trees of Fox Glen

Site area within which POS is proposed

Western field free from built form and incorporating improved grassland with no public access

Hollin Busk



Camera make & model - Canon EOS 5D Mark III
 Lens make & focal length - Canon EF 50mm, f/1.4 USM
 Date & time of photograph - 18.05.21 @ 16:37
 OS grid reference - 28105E, 98762N

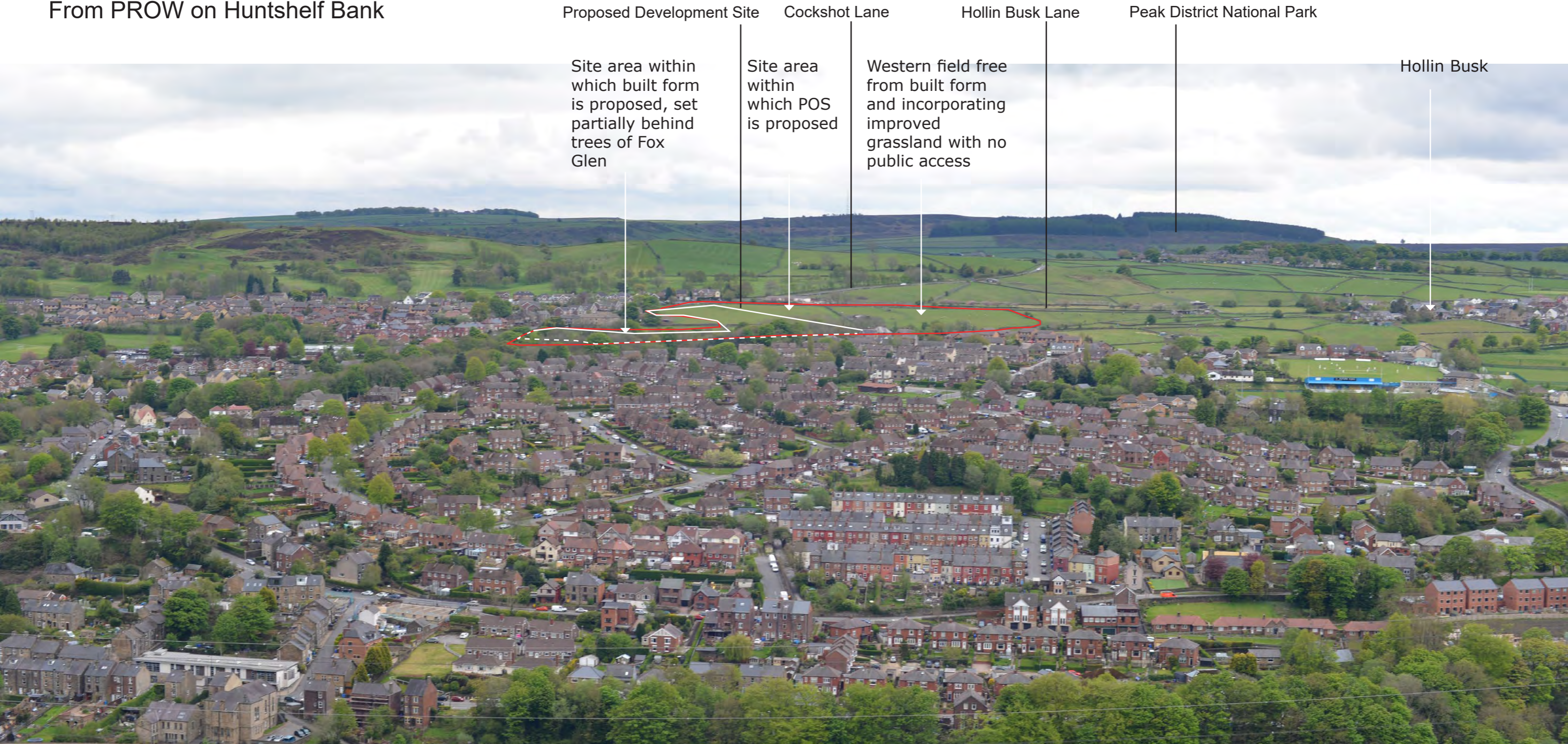
Viewpoint height (AOD) - 217 m
 Distance from site - 1.18 km
 Projection - Planar
 Enlargement / Sheet Size - 100% @ A3

Visualisation Type - Type 1
 Horizontal Field of View - 39.6°
 Height of camera AGL - 1.5m
 Page size / Image size (mm) - 420 x 297 / 390 x 260

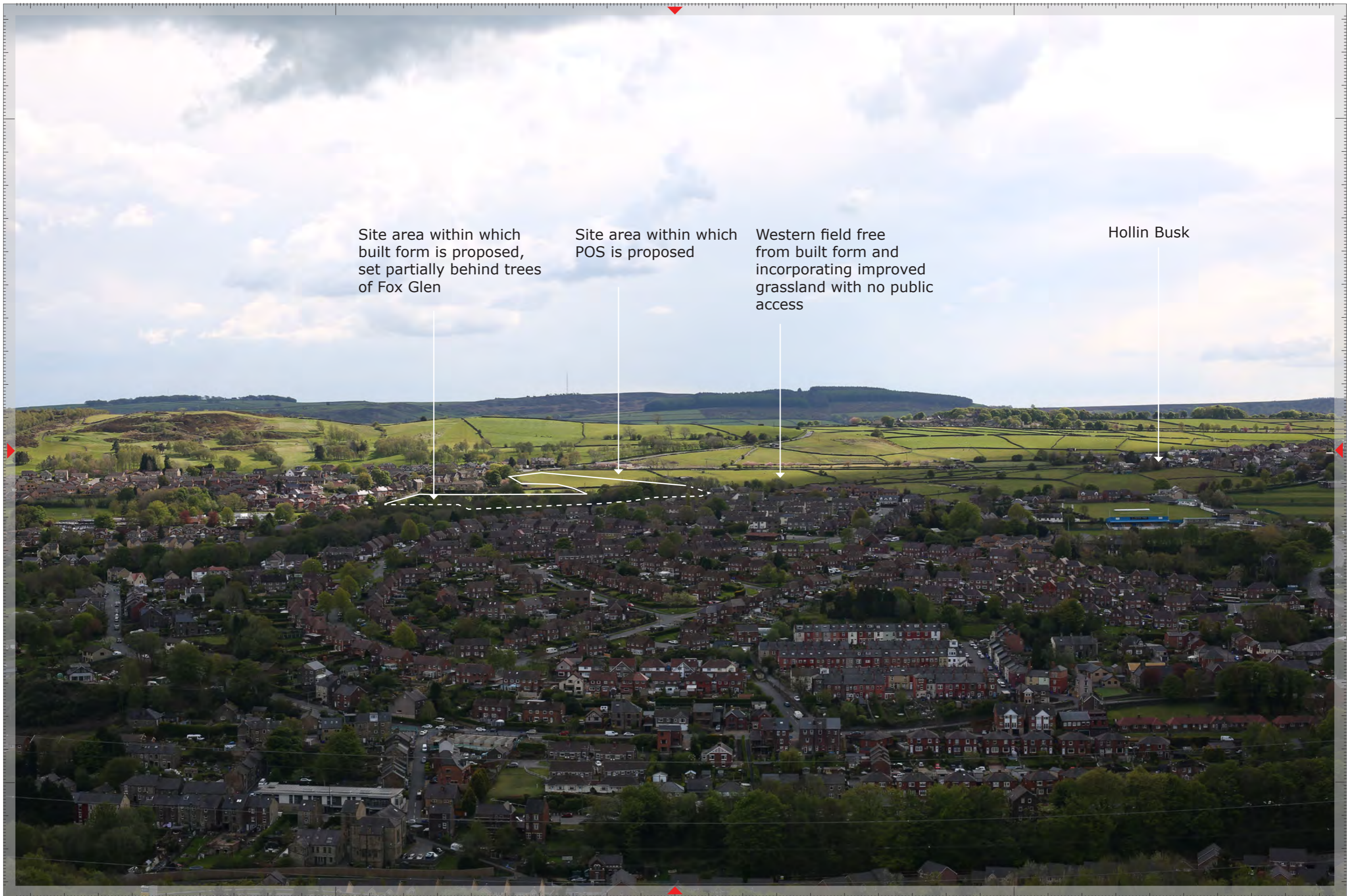
My photo from Mr Ares' viewpoint S4 with my annotations and a white outline of the area of proposed built form (dashed where set behind trees).

VIEW S5

From PROW on Huntshelf Bank



Above is Mr Ares' Photo from his viewpoint S5, to which I have added four annotations and a white outline of the area of proposed built form (dashed where set behind trees).



Site area within which built form is proposed, set partially behind trees of Fox Glen

Site area within which POS is proposed

Western field free from built form and incorporating improved grassland with no public access

Hollin Busk



Camera make & model - Canon EOS 5D Mark III
 Lens make & focal length - Canon EF 50mm, f/1.4 USM
 Date & time of photograph - 18.05.21 @ 15:57
 OS grid reference - 28164E, 98918N

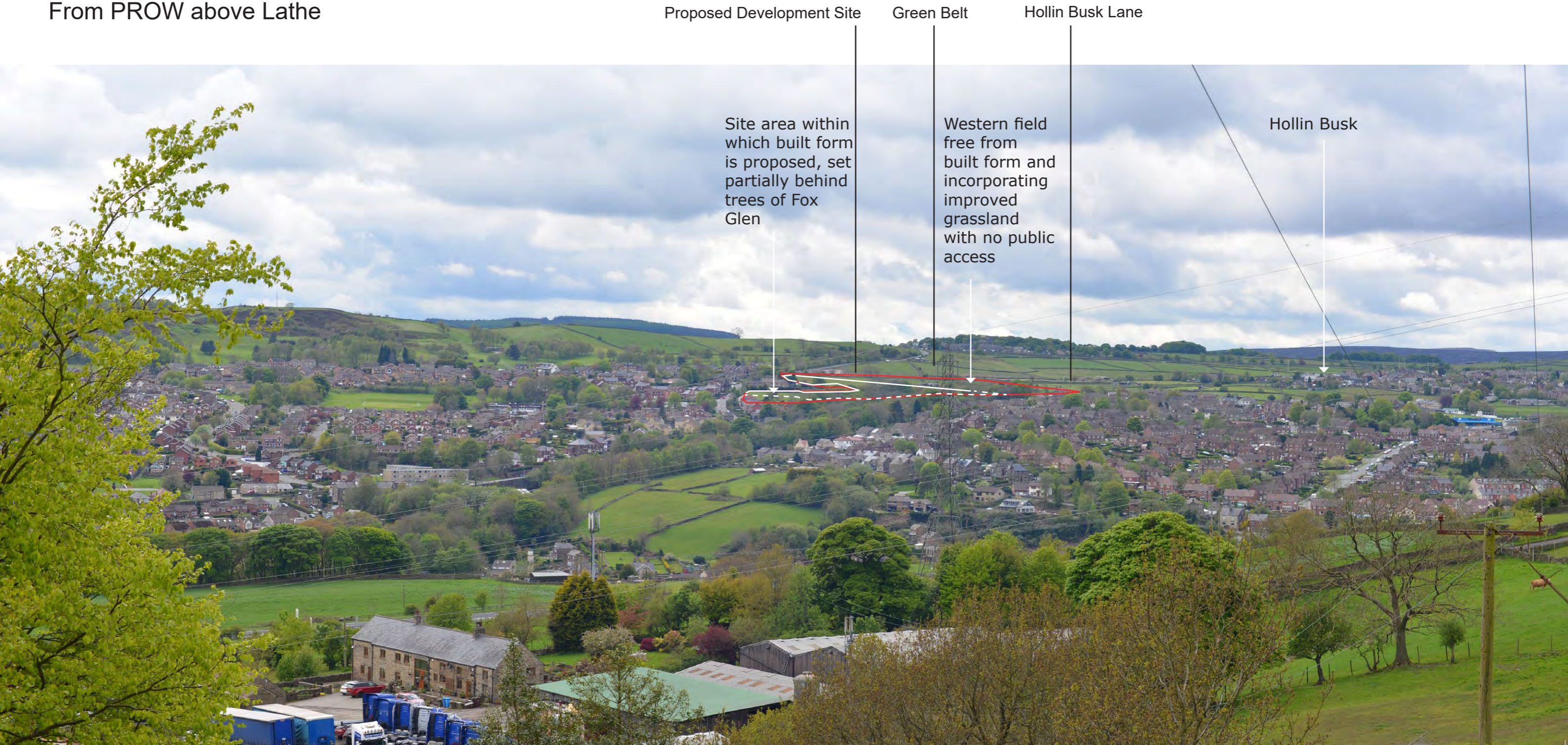
Viewpoint height (AOD) - 285 m
 Distance from site - 1.37 km
 Projection - Planar
 Enlargement / Sheet Size - 100% @ A3

Visualisation Type - Type 1
 Horizontal Field of View - 39.6°
 Height of camera AGL - 1.5m
 Page size / Image size (mm) - 420 x 297 / 390 x 260

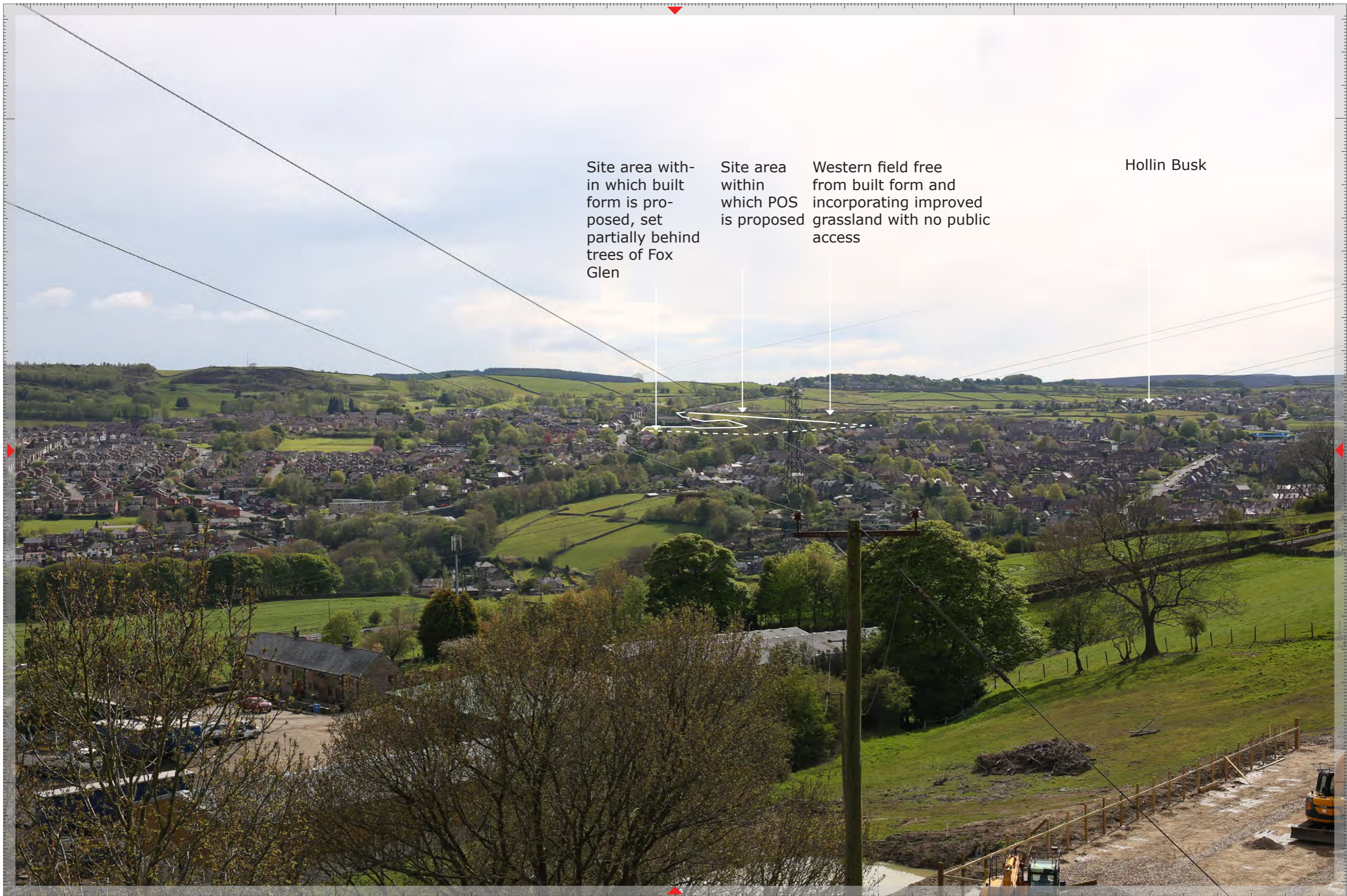
My photo from Mr Ares' viewpoint S5 with my annotations and a white outline of the area of proposed built form (dashed where set behind trees).

VIEW S6

From PROW above Lathe



Above is Mr Ares' Photo from his viewpoint S6, to which I have added three annotations and a white outline of the area of proposed built form (dashed where set behind trees).



Site area within which built form is proposed, set partially behind trees of Fox Glen

Site area within which POS is proposed

Western field free from built form and incorporating improved grassland with no public access

Hollin Busk



Camera make & model - Canon EOS 5D Mark III
 Lens make & focal length - Canon EF 50mm, f/1.4 USM
 Date & time of photograph - 18.05.21 @ 16:16
 OS grid reference - 28865E, 98907N

Viewpoint height (AOD) - 243 m
 Distance from site - 1.62 km
 Projection - Planar
 Enlargement / Sheet Size - 100% @ A3




Visualisation Type - Type 1
 Horizontal Field of View - 39.6°
 Height of camera AGL - 1.5m
 Page size / Image size (mm) - 420 x 297 / 390 x 260

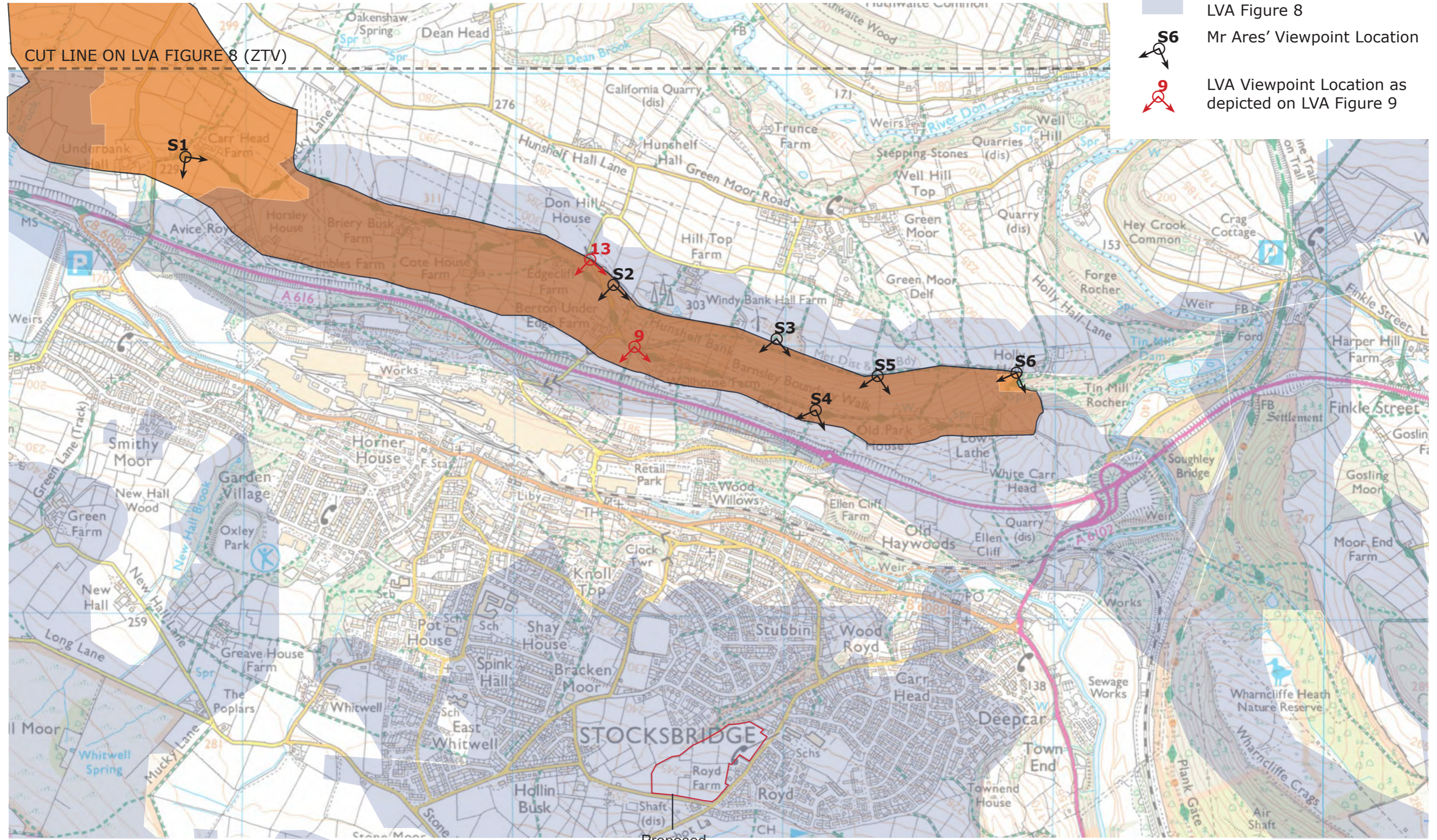
My photo from Mr Ares' viewpoint S6 with my annotations and a white outline of the area of proposed built form (dashed where set behind trees).

ANNEX 3

REPLICATION OF MR ARES' APPENDIX C WITH FURTHER ANNOTATION, ZTV AND VIEWPOINTS ADDED

Below is Mr Ares' Amended Representative Visual Envelope plan, upon which I have overlaid the areas within the ZTV taken from Figure 8 of the LVA. I also add Mr Ares' six additional viewpoint locations and the two representative viewpoint locations on Hunshelf Bank within the LVA.

- KEY**
-  Areas of ZTV indicated on LVA Figure 8
 -  Mr Ares' Viewpoint Location
 -  LVA Viewpoint Location as depicted on LVA Figure 9



Proposed Development Site