

## Heathrow Expansion DCO Consultation Response Landscape and visual amenity

September 2019

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### 1. Overview

- 1.1 This paper sets out the Mayor's response to the statutory consultation by Heathrow Airport Limited (HAL) on its expansion proposals on the issue of landscape and visual amenity.
- 1.2 In summary, HAL has failed to properly assess impacts on tranquillity and have not sufficiently assessed landscape and townscape features. Details of mitigation are insufficient and a more holistic approach to mitigation must be taken and further detail of any measures must be provided. The approach to green-belt openness is also inadequate.

### 2. Scoping and engagement

- 2.1 HAL has consulted Natural England, Highways England and Heathrow Strategic Planning Group (HSPG). However, consultation with local planning authorities that are not members of the HSPG is limited and envisaged during the next stage. In particular, LB Hillingdon will be important as its jurisdiction falls within a key part of the study area.

### 3. Baseline and methodology

- 3.1 In undertaking the baseline review, the Preliminary Environmental Information Report (PEIR) assumes, based on the National Character Area work, that none of the study area is tranquil. Due to the broad nature of the tranquillity work upon which this assumption is made (CPRE map of Tranquillity (2006)), it is considered that relative baseline tranquillity of key outdoor locations (agreed with stakeholders) such as areas of open space and footpaths within the Green Belt within the 5 kilometre study area should be considered in the Environmental Statement (ES). These should be locations where airport operations and traffic noise and other visual intrusion of urban features, although evident, are noticeably reduced. The approach to this noise monitoring and the locations, including a visual survey at each, should be agreed with the local planning authorities and Greater London Authority (GLA). No such agreement has been reached.
- 3.2 The assessment of tranquillity as part of aircraft movements above the Chilterns Area of Outstanding Natural Beauty (AONB) is based on WebTAG (Transport Analysis Guidance - 'Landscape' (TAG Unit A3 – Section 6)) and follows the advice in CAP1616 published by the CAA. It is suggested that, in order to inform a better understanding of how

existing aircraft noise permeates the Chilterns landscape, noise monitoring at key outdoor publicly accessible locations within the wider aircraft movements study area should be carried out. The approach to the noise monitoring and the locations should be agreed with the Chilterns AONB and Natural England.

- 3.3 In determining the significance of effect, the PEIR states in paragraph 15.7.8 “Only ‘Large’ or ‘Very Large’ effects are considered likely significant effects for the purposes of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations), as is consistent with HA 205/08 - Assessment and Management of Environmental Effects, Highways Agency (2008).” It is recommended that the ES should consider “Moderate” effects as well.
- 3.4 Strategic constraints and 85 local landscape character areas have been mapped within a 5 kilometres study area (Figures 15.1 and 15.3 respectively), extending at certain locations to take account of more distant viewpoints. 33 representative viewpoints have been identified and agreed with stakeholders within the 5 kilometres study area and summer photography of each has been provided. The view angle in the PEIR is stated as being approximately 90 degrees and the viewpoint co-ordinates are stated in Table 15/18 but no further detailed information such as distance to the proposed development boundary, elevation, or detailed mapping of the viewpoint location, or camera make/tripod height has been provided.
- 3.5 Photography has been undertaken in accordance with the Landscape Institute (LI) advice note 01/11 (Figures 15.4 to 15.20). The LI are presently reviewing this advice note and as such the draft/revised note should be considered for ongoing photography to support the assessment in the ES. No winter or night time photography has been provided as part of the PEIR. It is noted that the PEIR states that winter surveys have been carried out and that survey work is ongoing as part of the iterative design process.
- 3.6 Background data on Natural England’s National Character Areas and all the published local landscape character areas within the study area have been provided in the supporting Appendix. Table 15/16 sets the baseline data for all 85 local character areas in the study area. Their spatial arrangement is set out in Figure 15.3. The baseline data provides a high-level summary of the published documentation for each character area. However, the data provided does not give a clear and concise picture of the site-specific baseline landscape or townscape features within each of the character areas and how these features relate to the proposed development. The sensitivity of the character areas is based on high-level considerations and typically the landscape comes out as having a moderate sensitivity, without sufficiently detailed justification.
- 3.7 It is suggested that the landscape baseline provided in the ES for each of the character areas should provide a clear and concise detailed picture of the baseline landscape features, how they help to define the local character and relate to the ecology and heritage assets; and also, how these features relate to the proposed development. A more detailed baseline review during the preparation of the ES could have identified locally high sensitivity character areas, particularly ones closer to the proposed development. It is important to note that high sensitivity landscape is a result of a

combination of many facets and can include locally valued and important landscapes, for example farm land which provides a strong contrast with the nearby urban area, i.e. areas which may have pockets of relative tranquillity and a sense of remoteness and/or open space within the Green Belt, which is frequently used by local people and visitors to the area, such as the Colne Valley.

- 3.8 Table 15/18 sets out the baseline visual amenity for the study area based on the 33 representative viewpoints. The photographs for the summer views for each of these viewpoints are shown on Figures 15.4 to 15.20. The table provides an outline description of the view for each during summer and winter (if different) and night time. The distance of each viewpoint to the proposed development is not specifically stated. It is important that the selection and location of representative viewpoints are agreed with all local planning authorities, including those that have not yet been consulted. The supporting PEIR photographs are not annotated. Annotation on baseline photographs for the ES should pick out key features. The existing Heathrow Airport along with the extent of proposed development should be included to help orientate the reader.
- 3.9 Additionally, the mapping used to depict the study area (including the ZTV) at this scale is difficult to read and therefore it is recommended that appropriate larger scale mapping is used to support the ES so that constraints and key features can be clearly identifiable against the base mapping.

#### **4. Assessment**

- 4.1 The mitigation outlined is vague and insufficient and is limited to stating the need for good design and control. A spatial arrangement of landscape and ecology mitigation is set out in the accompanying figures. It is recommended that for the ES there should be a holistic approach to mitigation, which is landscape led, is based on a strong narrative and has clear landscape strategy resulting in a package of site-specific as well as wider environmental mitigation and enhancement measures, particularly within those areas where “Very Large”, “Large” and “Moderate” effects are reported during operation.
- 4.2 Discrepancies have been noted between Tables 15/19 and 15/22 in relation to the number of Local Character Areas that report a significant effect during both construction and operation. Table 15/19 reports moderate adverse effects on a further 3, 6 and 4 Local Character Areas for Construction, Operation Year 1 and Operation Year 15 respectively. These are not reported as a significant effect in Table 15/22. The ES should ensure all local character areas where “Very Large”, “Large” and “Moderate” effects are predicted are reported.
- 4.3 Similarly, there are discrepancies between Tables 15/21 and 15/22 in relation to visual amenity and the number of representative viewpoints that report a significant effect during operation. Table 15/21 reports moderate adverse effects on a further 2 representative viewpoints during construction but these are not reported as a significant effect in Table 15/22. The ES should ensure all viewpoints where “Very Large”, “Large” and “Moderate” effects are predicted are reported.

- 4.4 All high sensitivity visual amenity receptors within the study area where “Very Large”, “Large” and “Moderate” effects should be considered in the ES. These should be represented in the Visual Effects Schedule and shown on the Visual Effects Drawing, both of which are a requirement of IAN 10/135.

## **5. Effect on “Openness” of the Green Belt**

- 5.1 The accompanying paper on Land Use and Housing provides general commentary on the assessment of impacts on the Green Belt and should be read in conjunction with the following section that discusses the landscape and visual amenity aspects of the Green Belt.
- 5.2 With reference to the Court Ruling in Euro Garages Ltd v Secretary of State for Communities and Local Government, the “openness” of the Green Belt needs to be considered in terms of impacts on its landscape character and visual amenity. The ES landscape assessment should consider the impacts of the proposed development on “openness” and it is therefore recommended that the ES landscape assessment should include a section on Green Belt. This section sets out the effects on the landscape and views within the Green Belt, by cross reference to the assessment of effects on landscape character and visual amenity elsewhere in the chapter. The assessment should also make judgements on whether or not the effects on “openness” can be mitigated or off set through wider environmental enhancement. The findings should then feed into the planning report that is submitted as part of the DCO application. In undertaking this work, the ES landscape assessment should also consider additional viewpoints that best represent the visual amenity of the Green Belt, and which are agreed with stakeholders.
- 5.3 A preliminary cumulative assessment of construction and operation effects on landscape and visual amenity are set out in table 15/23 and 15/24 respectively. The preliminary assessment considers that there would be no significant cumulative construction or operation effects as a result of the proposed development in association with the other developments identified. It is suggested that the ES should also include an assessment of cumulative effects on the “openness” of the Green Belt.

## **6. Consideration of additional environmental measures or compensation**

- 6.1 The PEIR states that “No additional environmental measures are proposed to further reduce the landscape and visual amenity effects that are identified in this PEIR. This is because all relevant and implementable measures are proposed to be embedded into the DCO Project design and are assessed in the chapter”. The ES landscape chapter should consider further mitigation and wider environmental enhancement measures within local character areas and areas of Green Belt where “Very Large”, “Large” and “Moderate” effects are reported.

## **7. Assumptions and limitations of this assessment**

- 7.1 The impact of the assumptions used in the PEIR is not consistently acknowledged and how this has been carried through to the preliminary assessment is not always clear. It is

important that the ES landscape and visual amenity assessment is based on clear, robust and transparent professional judgement and that all opportunities for green infrastructure and wider environmental enhancement measures are fully considered.

- 7.2 For the reasons set out above, there is a serious lack of sufficient detail on the impacts on landscape and visual amenity. As with other topic chapters, the Mayor of London/GLA does not consider that HAL has complied with its duty to provide information which is reasonably required to develop an informed view of the likely significant environmental effects (as per Regulation 12 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017). HAL should formally re-consult on the impacts once it has addressed the serious defects set out above.