

**Corridor between the A34 Milton Interchange and the B4015
north of Clifton Hampden.**

on behalf of the

NEIGHBOURING PARISH COUNCILS - JOINT COMMITTEE (NPC-JC)

PROOF OF EVIDENCE ON LANDSCAPE

ALAN JAMES BSc MA MLI (RETIRED)

1. My name is Alan James. I have a BSc Honours in Geography (University College London), an MA in Landscape Architecture (University of Sheffield) and am a retired chartered Member of the Landscape Institute (MLI). I have worked as a landscape architect since 1973, and from 1996 also worked as a consultant on sustainable transport. I have been an expert witness on both landscape and transport matters in over 20 public inquiries since 1996, including several major road schemes.
2. At this inquiry I am representing the Neighbouring Parish Councils Joint Committee (NPC-JC). I prepared evidence on Landscape, Green Belt, and alternatives to HIF1 for the HIF1 application, with reference to the sections from Didcot to Culham and from Culham to the end of the Clifton Hampden bypass. These reports were included in the objection to the scheme that was heard at the Planning and Regeneration Committee of Oxfordshire County Council (PRC) meeting on 17 and 18 July 2023. That committee heard the evidence both for and against the proposal, and its decision was a firm rejection of the application. Two of the grounds for refusal were (2) inappropriate development in the Green Belt and (6) unacceptable landscape impact. These two aspects are the subject of my two proofs of evidence to the inquiry: this proof covers Landscape.
3. HIF1 was called in by the Secretary of State (SoS) after the PRC decision had been made but before a letter of notification had been issued by Oxfordshire County Council (OCC). It is not for me to question the legitimacy of the call-in, though it puzzles me somewhat: the decision was made by the PRC of OCC, and there was no mechanism for OCC to overturn the decision in the notification letter, so OCC's decision had in effect been made on 18 July. However, I accept that the call-in was not challenged at the time, so we are where we are.
4. What I do find unacceptable is the subsequent attempt by the Local Planning Authority (LPA) to erase or at least neutralise the PRC decision for the purposes of the inquiry, through the second PRC meeting in September 2023. The PRC decision in July was made and although it cannot now be **enacted** by OCC this does not mean that it was not **made**. The decision cannot be disinvented, no matter how much the LPA officers disagreed with it. The PRC members heard both sides of the argument at the July 2023 meeting and rejected HIF1. Whatever the reasons for the PRC

rowing back from some of the decisions in July 2023 at the meeting in September 2023, under considerable pressure from officers, they do not alter the fact that the PRC had decided otherwise only two months earlier.

5. On Landscape, the September PRC meeting resolved that:

“[the] proposal from the applicant as set out in Annex 5 was welcomed and demonstrated that it was seeking to address landscape concerns where possible. Subject to the proposed wording of conditions to secure the additional detail now proposed by the applicant, it was advised that this reason for refusal could now be resolved through the Statement of Common Ground with the applicant and not pursued thereafter at the Local Inquiry.” (LPA SoC Reason 6)

Annex 5 refers to a document contained in Annex 3 Of the LPA SoC, but to date I have been unable to access Annex 3 from the core documents supplied by the LPA. It is understood that ‘Annex 5’ includes the proposal to plant some semi-mature trees, to offset criticism of the inadequacy of tree planting, but without the document it is not possible to know exactly what is proposed and whether other issues are covered.

6. Whilst the LPA may pronounce itself satisfied that a few semi-mature trees remove the need for any further consideration at the inquiry, the assertion that this resolves the landscape issues raised by HIF1 is completely untenable. The main problems arise because it is proposed to build a new road on a defined alignment in open and in places very attractive countryside, and these cannot be resolved by conditions on the amount and size of tree planting.
7. The promise of semi-mature trees appears also to have satisfied the two District Councils, South Oxfordshire (SODC) and Vale of White Horse (VWHDC)¹, which were highly critical of the planning application because of the inadequacy of planting proposals, to the extent that the application was regarded as non-compliant with the Local Development Plan. See section on SODC below.

Core landscape objections

8. The fundamental objections to HIF1 on landscape grounds were covered in my report on the planning application, January 2023, and are not addressed by subsequent OCC Applicant responses, which are mostly about tree planting. My report is included as Appendix 1 to this proof. In summary:
- The landscape assessment notes several large or very large adverse impacts in its LVIA and WebTAG analyses, but seeks to play them down as either having minimal effect on Landscape Character Areas overall or being inevitable in any highways scheme, therefore by implication not all that important.
 - The assessment uses both LVIA and WebTAG guidance, but does not follow WebTAG guidance adequately, covered in more detail in the next section of this proof, in particular with reference to the ‘most adverse rule’
 - The most important impacts are at:
 - the Thames bridge which significantly impacts on the nationally significant Thames Path National Trail but which is treated as much the same as any other impact;
 - the countryside setting of the Clifton Hampden bypass, where the road intrudes into a peaceful enclave of fields, mature hedgerows and trees, woodland, on the edge of the village and criss-crossed with footpaths enabling public access;
 - the viaduct across the gravel lakes to the South of the Thames (not even addressed in earlier assessments, as it was apparently not realised that the lakes were there), where

¹ The DCs have produced joint statements at each stage, differing primarily in the geography of the two areas.

- a tranquil water body of increasing biodiversity and potential recreational value will have its character shattered by a squat brutalist concrete viaduct;
 - and the Appleford sidings, where the importance of visual impact on residents is significantly underplayed.
9. The issue of tree loss and inadequate replacement planting was not covered in this objection, but their importance is recognised, especially in the responses of SODC and VWHDC. They were picked up in my internal comments on the Officer Report to the July 2023 PRC meeting:

“One area I did not cover in much detail was loss of tree cover, but this has clearly exercised landscape officers in both DCs. The argument runs that there is a net loss of 5000m² of tree canopy, including one-third of all individual trees, in an area of generally sparse tree cover, and this is incompatible with local policies (OR para 197). The OR argues that policies can be overruled if there is sufficient justification, but the rationale for the justification is fallacious. It runs that the road is “clearly” part of the overall strategy for growth, so the overall strategy for growth cannot be achieved without tree loss. This is self-fulfilling, because the people who want to build the road are the people who devised the strategy!”

WebTAG landscape appraisal

10. The LVIA is covered in Chapter 8 ‘Landscape and Visual Impact’ of the Environmental Statement (ES) accompanying the application, but there is also a WebTAG landscape appraisal that is somewhat more difficult to find, in ES Appendix 3.1². This reports on the WebTAG appraisal across several environmental issues including 6 ‘Landscape’. The relevant WebTAG section is TAG Unit A3, submitted with this proof.
11. LVIA, WebTAG, and LA 107 (DMRB) all operate on the same principle, arising out of the Environmental Capital approach developed in the 1990s alongside the move in the landscape profession towards Landscape Character Assessment (LCA). The former had as its underlying basis ‘What Matters and Why?’ (part of the title of the study report), and LCA embodies this principle in the philosophy that ‘all landscapes matter’, not just the highly prized and widely recognised landscapes in places like National Parks. The methodologies all seek to identify the inherent sensitivity of landscape types or views, set against the magnitude of impact of the proposed development, to arrive at an overall assessment of landscape effects from large adverse through neutral to large beneficial. Where WebTAG differs to some extent from LVIA is in the meaning attached to any given assessment, which is the essence of ‘what matters **and why**’.
12. The appraisal in Appendix 3.3 assigns a ‘moderate adverse’ impact on HIF1 for the section between Didcot/ Culham/ Clifton Hampden. ‘Moderate’ is something of a misnomer, simply referring to the category between ‘large’ and ‘slight’ adverse impact: the landscape effects are anything but moderate, defined (TAG unit A3 Table 4) as the scheme being:
- out of scale with the landscape, or at odds with the local pattern and landform
 - visually intrusive and will adversely impact on the landscape
 - not possible to fully integrate, that is, environmental design measures will not prevent the scheme from scarring the landscape in the longer term as some features of interest will be partly destroyed or their setting reduced or removed
 - will have an adverse impact on a landscape of recognised quality or on vulnerable and important characteristics or elements
 - in conflict with local and national policies to protect open land and nationally recognised countryside

² Chapter 3 of the ES is about assessment of alternatives, so Appendix 3.1 would appear to refer to Chapter 3

13. The HIF1 Planning Statement's LVIA conclusion (7.4.7) is that *"no significant landscape effects are predicted on published landscape character areas"*. (see my para 8 first bullet above, and my Appendix 1). As outlined above, the TAG 'moderate' impact makes it very unlikely that the effects would not be significant on landscapes of high sensitivity and/or importance.

14. The TAG assessment qualifies the 'moderate adverse' conclusion with the comment that there is *"potential for significant impacts that may be unavoidable due to the nature of the required routes across rural landscapes including the River Thames valley resulting in landscape severance and affecting tranquillity and existing views from public rights of way and other sensitive visual receptors. However, exploration of improvements to the landscape immediately surrounding the Scheme and good design of the corridor and associated structures could help to integrate it within the context so far as is possible"*. (ES Appendix 3.1, para 6.2)

15. As well as being distinctly half-hearted, this qualification is non-compliant with WebTAG, which states that:

- The final Table 4 impact assessment (moderate adverse in this case) reflects the nature of impact after maturation of environmental design measures (TAG A3 para 6.2.14);
- Reduction in impact due to mitigation measures that might be identified subsequently cannot have a bearing on the assessment score (TAG A3 para 6.2.11);
- Caution is needed even over the validity of integral design measures in reducing impact where their successful implementation and/or effectiveness are not guaranteed (TAG A3 6.2.9).

It must be concluded that the TAG appraisal for the section of HIF1 between Didcot/ Culham/ Clifton Hampden is of a moderate adverse impact even after mitigation, and thereby a significant landscape effect, unless the applicant can demonstrate convincingly that scheme design elements developed since the TAG appraisal in 2018 have materially reduced the impact.

16. A very important principle of WebTAG is the 'most adverse category' rule:

"a scheme as a whole should be assessed according to the most adverse assessment of the key environmental resources affected. For example, if a scheme affects, say, five key environmental resources, of which one is in the 'large adverse' category and the remaining four are 'slight adverse', then the overall assessment score should be 'large adverse'. The rationale for this approach is that highly adverse impacts should not be diluted or masked by less adverse impacts." (TAG unit A3 para 5.3.19)

HIF1 has several 'large adverse' assessments, for example at the Thames river crossing, the impact on the nationally significant Thames Path (National Trail), and the Clifton Hampden bypass. ***The overall assessment should therefore be Large adverse.***

Annex 5 and mature tree planting

17. The LPA SoC reports (2.42) the OCC applicant's commitment to plant up to 50 semi-mature trees:

"Given that the committee included landscape impacts as a reason for refusal at its July committee meeting, the applicant has subsequently reviewed its position and committed to 50 new trees to be planted as semi-mature ... The emphasis is to reduce the immediate magnitude of visual impact, and therefore the resulting visual effect, from the key adjacent residents or stakeholders that are affected."

18. The LPA's response to this (SoC 2.43) is that

“The proposal from the applicant for upgrading up to 50 new trees to be planted to semi-mature specimens ... is welcomed by the LPA and demonstrates that it is seeking to address landscape concerns where possible.”

This conjures up an image of a semi-mature tree being well on the way to maturity, but horticulturally a semi-mature tree is a somewhat larger version of a standard tree. The classification is based on the girth of the trunk 1m above ground level, as below (from BS 3936 nursery stock specification for trees and shrubs)

Specification	Tree Girth
Light Standard (LS)	6-8cm
Standard (S)	8-10cm
Select Standard (SS)	10-12cm
Heavy Standard (HS)	12-14cm
Extra Heavy Standard (EHS)	14-16cm
Advanced Heavy Standard (AHS)	16-18cm
Semi mature	18-20cm

19. Girth is perhaps harder to visualise than trunk diameter. A semi-mature tree with a girth of 20cm has a trunk diameter of just over 6cm. Even small trees like rowan and hawthorn have diameters of 20-30cm at around 20 years old, while oak and beech can have a diameter of 40cm or more at around 20 years old. Oaks that would be perceived by most people to be ‘mature’ will have trunk diameters of 60-80cm and can be much larger still. The same comparisons can be made for overall height (around 4.5m for a nursery stock semi-mature tree), and for canopy spread.
20. It can be seen that in a setting where mature trees have been removed but a comparison with those that remain is still possible, a ‘semi-mature’ planted tree has a negligible visual presence. It will look like a planted tree, be staked or guyed for several years, and will establish itself very slowly compared with trees planted at a smaller size. In my view it would be questionable professional landscape practice to plant semi-mature trees in this context. Semi-mature trees are better suited to locations where they can have a genuine visual impact, and where there are few existing mature trees for comparison unless done on a grand scale for example to create or replace an avenue in a country estate. It is also expensive and risky, and reliant on high standards of long-term maintenance which cannot be guaranteed no matter how well-intentioned the maintenance authority may be, especially in these times of more frequent extreme weather events due to climate change.
21. In summary, semi-mature trees will confer little additional benefit to the landscape treatment of HIF1, and it is illusory to suggest that ‘up to’ 50 trees, spread across four locations, will tip the balance from ‘inadequate’ to ‘adequate’. It is hard to believe that the LPA and the District Councils have pronounced themselves satisfied by such an insignificant change to the planting proposals.
22. Annex 5 reportedly also includes a commitment by OCC Applicant to establish a ‘Landscape Enhancement Fund’ for community-led additional tree planting. This is possibly somewhat more useful than planting semi-mature trees, but with all such schemes there is many a slip twixt intention and realisation. There are many unanswered questions over management, the ease and cost of land acquisition, maintenance agreements, distribution of funds between District and Parish Councils, and ultimately how effective £50,000 worth of planting across all four sections of HIF1 would be.

District Council responses

23. SODC and VWHDC have produced joint responses to the HIF1 planning application. This proof covers that of SODC, referring in particular to the series of responses from February 2022 to June 2023 contained in Appendix 1 of the SODC Statement of Case (pdf pp 21 to 41).
24. The SODC landscape officer has been consistently critical of the planting proposals in the HIF1 application. The general point in the February 2022 response is that there was significant loss of tree cover and important trees, in an area with relatively sparse tree cover, and not enough was being proposed to offset the significant loss.
25. In the December 2022 response, following the Regulation 25 request for further information, the criticism became harsher and more specific (pdf p21):
- The extent of replanting remained inadequate
 - There was a net loss of 50,000m² of tree cover (subsequently said to be 5,000m², needs clarifying)
 - No figures for hedgerow loss
 - Planting proposals have not been *“designed to link in with the existing landscape pattern to help to integrate the road with the landscape”*
 - Proposals at the Culham Science Centre entrance are a significant concern, resulting in an *“unacceptable loss of mature trees”*
26. The SODC landscape officer concluded that *“The proposal is therefore contrary to policy ENV1 of South Oxfordshire Local Plan 2035, which states development will only be permitted where it protects and where possible enhances features that contribute to the nature and quality of the landscape,”*. This statement contradicts all claims that HIF1 is completely in accordance with the local development framework.
27. After another round of consultation, and prior to the July 2023 OCC PRC meeting at which the planning application was rejected, the SODC landscape officer was even more trenchant in criticism of tree planting proposals, stating (pdf p41) that:
- “The extent of planting mitigation proposals remains inadequate, as noted in previous comments ... It is very disappointing that no significant changes have been made at the CSC entrance which remains a major concern ... The response to landscape comments ... shows a lack of willingness to include even otherwise unusable areas of land for planting to help with mitigation... This approach to landscape mitigation is reflected throughout the proposals, resulting in a scheme where the extent of mitigation appears to have been largely limited to within the engineering land take, rather than defined by an assessment of landscape and visual mitigation requirements”* (my emphasis)
28. Although not stated explicitly in the July 2023 response, there can be little doubt that the landscape officer’s comments do nothing to alter the previous conclusion that HIF1 is non-compliant with ENV1 of the SODC Local Plan. It is therefore very difficult to understand how SODC could resolve in August 2023, as reported in SODC SoC paragraph 5.19iv, that up to 50 semi-mature trees and a limited community planting scheme full of potential pitfalls make all the difference to the acceptability of the scheme. The claim is that *“these measures will help manage and mitigate the harmful effects of the development”*. Do they really think that such insignificant changes make all the difference to proposals that their landscape officer describes as inadequate, very disappointing, not defined by an assessment of landscape and visual mitigation requirements, failing to link with the existing landscape pattern, and non-compliant with the specific policy ENV1??

Concluding remarks

29. HIF1 has a large adverse impact on the landscape setting between Didcot, Culham, and Clifton Hampden, on sensitive and important landscape settings including that of a National Trail. The significance of landscape effects has been underplayed by Oxfordshire County Council as Applicant, and Oxfordshire County Council as Local Planning Authority has failed to take adequate account of the actual significance of effects.
30. The Applicant has suggested that these effects are minimal at the scale of local Landscape Character Areas, by which argument all development has at most a minor adverse landscape impact if the scale of comparison is big enough.
31. The second argument deployed by the Applicant is that all roads have large adverse landscape impacts, implying that this is not in itself a valid argument to set against any given road scheme. The correct assessment should be that large and significant landscape impacts create a very high bar against which scheme benefits should be measured.
32. The offer by the Applicant to beef up planting by specifying 'up to' 50 semi-mature trees goes nowhere near enough to addressing the trenchant criticisms of the scheme planting design by landscape officers of the District Councils. It is to their discredit that they appear to be satisfied with such a minimal enhancement.

Alan James
January 2024

APPENDIX 1:

HIF 1 PLANNING APPLICATION R3 0138/21

NPC-JC OBJECTION ON LANDSCAPE GROUNDS

ALAN JAMES JANUARY 2023

OXFORDSHIRE COUNTY COUNCIL (OCC): DIDCOT HIF 1

PLANNING APPLICATION R3 0138/21

OBJECTION ON LANDSCAPE GROUNDS

JANUARY 2023

Alan James BSc MA MLI (retired)

This submission is made on behalf of the five Parish Councils of Appleford-on-Thames, Burcot and Clifton Hampden, Culham, Sutton Courtenay, and Nuneham Courtenay (the Neighbouring Parish Councils – Joint Committee) and covers the landscape objections to the preferred option for HIF1 in the above planning application. The part of the application with direct impact on the five parishes includes sections C (Didcot to Culham) and D (Clifton Hampden bypass).

The objection falls into two parts:

- General issues concerning the LVIA assessment and its reporting; failure to follow WebTAG guidance on landscape appraisal; and Green Belt
- Comment on the most severely affected sections of the proposal

LVIA (Landscape and Visual Impact Assessment)

The AECOM assessment follows standard LVIA practice, and records several significant adverse appraisal outcomes both on landscape and visual impact, but downplays the effects to the point that they sound fairly harmless. The Planning Statement typifies this practice in two statements:

“the LVIA concludes that no significant adverse effects are predicted on published landscape character areas” (PS 7.4.7)

This is disingenuous. The Landscape Character Areas (LCA) identified by the District Councils are relatively large areas compared with the parts affected by the road, so it is argued that the impact on the overall area is at most slight. However, the LCAs are baseline expressions of landscape character from which impact assessment proceeds within the visual envelope of the road, not an area measurement against which to compare the proportion of the LCA affected. The LCA highlights what matters and why in the affected area: what proportion this is in a given LCA, or a national character area, or Oxfordshire, or England, is irrelevant. The effects on the Local LCAs (LLCA) identified by AECOM are considerably greater and include significant adverse impacts. Even so, the LLCAs usually extend beyond the visual envelope.

“it will not be possible to provide a highway scheme in a rural context without some significant adverse landscape and visual effects” (PS 7.4.13)

This is a standard argument, that major roads inevitably have major landscape impacts, so in itself that is not a barrier to going ahead with the scheme. The conclusion should instead be that significant landscape and other environmental impacts create a high bar against which to evaluate scheme benefits: it is not acceptable to shrug off the appraisal and say that as usual there are significant landscape impacts.

LVIA (and WebTAG) appraisals almost always downgrade year 15 impacts by one step, for example from large adverse to moderate adverse, on the grounds that maturing landscape treatment softens the discordance of the new road in relation to its landscape setting. This depends on the nature of the discordance in relation to the core aspects of the landscape character of the area. For example,

the landscape impact on LLCA 12 (Thames floodplain) is said to reduce from large adverse in year 1 to moderate adverse in year 15, but the overwhelming impact of the embankment is the severance of the open floodplain, which is not mitigated at all by maturing trees along the embankment.

I flatly disagree with some of the baseline impact assessments, in particular for VH7/ LLCA 9 which include the area West of Appleford and the viaduct across the gravel lakes. The impact is greater than 'moderate', and the sensitivity is not 'low' at the restored and maturing lakes. LVIA is also silent on the *potential* value of areas like the gravel lakes, which in a few years have gone from industrial extraction sites to tranquil and attractive water bodies with great recreational potential.

The HIF1 LVIA acknowledges impacts of traffic as well as the road itself, but fails to assess the impact of additional traffic on roads affected by the scheme, notably at Nuneham Courtenay village and Abingdon, both of which are excluded from the study area but will see significant increases in traffic levels. This omission is subject to objection on several grounds other than landscape assessment.

WebTAG

The AECOM ES includes reference to WebTAG landscape appraisal guidance (Unit A3, sections 5 and 6), which is broadly parallel to LVIA (and DMRB/ LA107), but is somewhat more focused on arriving at an overall summary of scheme effects, where LVIA too often (as here) ends up as an inventory of individual assessments. The overall assessment in the 2018 WebTAG appraisal for HIF1 was 'moderate adverse', which by definition (Unit A3 Table 4 pdf p44) is not moderate in the conventional meaning, merely between 'large' and 'slight'.

One part of WebTAG guidance is especially significant, the most adverse rule:

"Most adverse category ... a scheme as a whole should be assessed according to the most adverse assessment of the key environmental resources affected. For example, if a scheme affects, say, five key environmental resources, of which one is in the 'large adverse' category and the remaining four are 'slight adverse', then the overall assessment score should be 'large adverse'. The rationale for this approach is that highly adverse impacts should not be diluted or masked by less adverse impacts." (TAG unit A3 para 5.3.19)

This is one of the ground rules of the Environmental Capital approach, not specific to landscape assessment. HIF1 has several 'large adverse' assessments, for example at the Thames river crossing, the impact on the nationally significant Thames Path (National Trail), and the Clifton Hampden bypass. **The overall assessment should therefore be Large adverse.**

Major impacts on specific sections

1. Thames Path National Trail

ES Ch 8 Table 8.13 assesses the impact on recreational users of the Thames Path National Trail, whose sensitivity is rated as 'High', to be 'Major' at viewpoints RV19 and 20, with a 'Very Large Adverse' effect in Year 1, and 'Major' impact and 'Large Adverse' effects in Year 15. I dispute that the effect of the embankment and bridge would reduce in Year 15, especially as the impact remains major. This is a National Trail, of national significance, and the assessments cannot be brushed aside. Also, though not assessed, the same conclusions are likely to apply to recreational boat users on the river.

2. Clifton Hampden Bypass

The assessed impact on LLCA 16 (farmland at Clifton Hampden) is 'large adverse' during construction, 'moderate adverse' in Year 1, and 'slight adverse' in Year 15: visual impact reduces similarly. The main landscape impact is said to be loss of tranquillity, so it is difficult to understand why this would diminish over time with a bit of tree planting, given the intrusion of traffic in a currently peaceful landscape.

AECOM claim that the adverse effects of the Clifton Hampden bypass are offset by the removal of traffic in the village. It is questionable how much relief the bypass would bring to the village, given that a substantial amount of existing traffic in Clifton Hampden is travelling along the A415 to and from Abingdon and the A4074 southwards.

3. Viaduct at gravel lakes

The 330m long viaduct on the southern approach to the Thames bridge was not part of the scheme presented and assessed at the time of the 2018 business case, possibly because the lakes were not there at the time. The landscape assessment is therefore a retrospective appraisal of a massive scheme alteration. As such it must be treated with caution, as a conclusion of very large adverse impact would be embarrassing and could in theory require a major rethink of this section of HIF1. This outcome is avoided: the area (LLCA 9) is described as 'low' sensitivity and the viaduct has only a 'moderate' impact at all stages, resulting in a 'slight adverse' overall effect.

This is a travesty of an assessment. The photographs below show the main lake in March 2022 in poor weather: tranquil, visually attractive, with several species of water fowl, and maturing bankside vegetation even after only a few years. Imagine this scene, with further tree planting around the lake, on a bright summer's day in 15 years' time compared with the 15 year road assessment stage.



LLCA 9: Main gravel lake – viaduct would cross in centre foreground



LLCA 9: Main gravel lake detail of water's edge (R Thames immediately behind the trees)

The landscape assessment in ES Appendix 8.5 (pdf p13) claims that the extensive road earthworks will not be out of keeping with existing landscape character *“which includes extensive engineered earthworks as part of the mineral workings and landfill sites”*.

Even more dubiously, the assessment claims that *“the viaduct will sit above [the] water bodies such that it will not sever the landscape east and west”*. The photomontages (ES Fig 8.79) tell a different story, in spite of half the viaduct being hidden behind a temporary spoil heap! The viaduct is a low, squat, functional concrete structure, anything but the image of a soaring bridge allowing the landscape to flow effortlessly beneath. An accurate depiction of the viaduct as a photomontage on the first of the above photos would demonstrate its lack of transparency in the landscape setting.

Appleford Sidings

The road crosses the Appleford Sidings rail line around 8m above the tracks, with the tops of HGVs a further 4.5m above that, in close proximity to several residential properties. For some reason, the sensitivity of residents is classed as medium³ (ES Ch 8, Table 8.12 pdf p45). The magnitude of impact is assessed as ‘moderate’, resulting in ‘moderate adverse’ effects which are nonetheless classed as significant. It is beyond comprehension that a significant effect on local residents can be accepted without further question.

Alan James
January 2023

³ This may be a problem with GLVIA, which relates sensitivity in part to numbers of users at receptors, but it is difficult to accept that residents whose lives are blighted in their own homes are only of medium sensitivity: and in any case assessors are not obliged to follow GLVIA, which is avowedly non-prescriptive.

