



# Land at Hale Road, Farnham, Rebuttal Proof of Evidence of Catherine Ritson BL(Hons), CMLI

## Landscape and Visual Matters

**Appeal Reference: APP/R3650/W/24/3350600**

Prepared by:

**SLR Consulting Limited**

Treenwood House, Rowden Lane, Bradford on Avon,  
BA15 2AU

SLR Project No.: 402.065392.00001

Client Reference No: UK.138214

3 December 2024

Revision: 03

## Table of Contents

1.1	Introduction .....	1
1.2	Visual Receptors .....	1
1.3	Assessment of Effects .....	2
1.4	Reliance on Other Appeal Decisions .....	2



## 1.1 Introduction

- 1.1.1 This Rebuttal responds to the Proof of Evidence of Mr Robert Collett for Waverley Borough Council. Mr Collett does not appear to have professional qualifications or expertise in landscape and visual assessment, but it is his proof that sees to evidence the landscape and visual aspects of the Council's case.
- 1.1.2 I focus here only on points which I consider would merit from a written rebuttal. All other points raised by Mr Collett in his Proof are either already addressed in my evidence, or can be dealt with at the Inquiry. My silence here on any point made by Mr Collett should therefore not be taken as indicating agreement.

## 1.2 Visual Receptors

- 1.2.1 No methodology has been provided for Mr Collett's selection of visual receptors and how he has considered their sensitivity to the proposed change.
- 1.2.2 As GLVIA3 (paragraph 2.23) states, professional judgement is an important part of the LVIA process: whilst there is scope for objective measurement of landscape and visual changes, much of the assessment must rely on qualitative judgements. It is critical that these judgements are based upon a clear and transparent method so that the reasoning can be followed and examined by others.
- 1.2.3 Bullet 9, page 46 of GLVIA (CD 12.1) states: '*A step-by-step approach should be taken to make judgements of significance, combining judgements about the nature of the receptor, summarised as its sensitivity and the nature of the effect, summarised by its magnitude*'.
- 1.2.4 Section 3.0 of GLVIA (CD 12.1) illustrates this step-by-step approach at Figure 3.5. page 39.
- 1.2.5 Para 7.22 of Mr Collett's Proof states '*The Appeal Scheme would also be appreciated by users of the building / people visiting the site (which would not be insignificant in number)*'.
- 1.2.6 It is not standard practice to consider future users of a proposal as a visual receptor. Page 15, 6(1) of the GLVIA 3 Clarifications (CD 12.2) reinforces this and reads as follows at its second paragraph:  
  
*'An LVIA should consider views from local communities focusing on the way that a community currently experiences views from public locations such as streets and open spaces and how those will change'*.
- 1.2.7 Para 8.1, Table 1 Matters (of Mr Collett's Proof) identifies views of visitors within the appeal site as holding substantial weight. '*The proposals will result in a large number of people visiting*



*the site*'. If Mr Collett is referring to the future users of the Appeal Site then this holds limited weight (if any) and less weight than the visual amenity of neighbouring residents.

- 1.2.8 If Mr Collett is referring to people currently accessing the Appeal Site then reference should be made to para 6.10 of the Council's Statement of Case which states '*...the council accepts existing views would likely be limited.*'
- 1.2.9 At para 5.16 Mr Collett refers to the Appeal Site being part of potential SANGs within the Farnham Neighbourhood Plan. Whilst the Appeal Site is not fully secured and public access is currently possible it is not a formal area of open space currently enjoyed by the community. Its potential as SANG, and the extent to which it intended to be open to the public, is discussed at Mr Steele's Proof of Evidence, paragraphs 6.22 to 6.24. The proposals do not present a similar form of public open space to SANG. Visitors to the appeal site will have a different experience to that of users of public open spaces such as SANGs and the adjacent Farnham Park where infrastructure is designed for dog walking and recreation. The proposals will be in keeping with the adjacent cemetery uses and the historic potential for SANG is not considered relevant when considering the nature of receptors likely to be affected by the proposals.

### 1.3 Assessment of Effects

- 1.3.1 Mr Collett provides an assessment of the effects on landscape and visual receptors. No methodology has been provided for his assessment of these effects and the judgments made on their significance.
- 1.3.2 Bullet 9, page 46 of GLVIA (CD 12.1) states: '*A step-by-step approach should be taken to make judgements of significance, combining judgements about the nature of the receptor, summarised as its sensitivity and the nature of the effect, summarised by its magnitude*'.
- 1.3.3 Section 3.0 of GLVIA (CD 12.1) illustrates this step-by-step approach at Figure 3.5. page 39.
- 1.3.4 At para 4.8 and para 7.25 and 7.26: Mr Collett uses the term '*urbanising*' when referring to the introduction of the parking. No definition of this term is provided. No assessment is provided of the baseline conditions and the proposed changed in order to make a judgment on whether this term is relevant when describing the landscape effects. The proposed car parking is not located in the middle of the countryside, but on the edge of Farnham. In any case, car parking exists in the countryside and rural areas; it is not an inherently urban feature.
- 1.3.5 Mr Collett's assessment of effects on landscape are contradictory. For example, at para 8.2, Table 2 Mr Collett states that the proposal would improve the site's landscape setting. Whilst I agree with this statement, it contradicts with Mr Collett's overarching argument in relation to effects on the landscape.

### 1.4 Reliance on Other Appeal Decisions

- 1.4.1 Para 4.7 it is noted that there is a general reliance on the Inspectors' wordings from appeal decisions, which concern fundamentally different proposals, for reference to the term 'open', or 'openness' instead of published landscape assessments or an assessment of the Appeal



Site itself. I question whether an Inspector's description of the openness of a different site should be considered relevant as each site is unique.

- 1.4.2 Para 4.10's last sentence is misleading: *'While not every part of this area will have the same quality, the proposal is centrally located within the site in an area devoid of development and is a valued landscape.'*
- 1.4.3 The proposed built form is focussed to the least sensitive parts of the Appeal Site and there is existing development in its immediate context. It falls within a valued landscape which has a varying quality as described in the other appeal decisions.



