

# Proposed Logistics Development on Land North of the A20 (Ashford Road), Hollingbourne, Kent (Ref. 23/500899/OUT)

## Review of Landscape and Visual Matters

### 1. Introduction

#### Background

- 1.1 Peter Radmall Associates have been commissioned by Maidstone Borough Council to carry out a review of the landscape and visual impacts of the proposed logistics (Class B8) development on land to the north of the A20 (Ashford Road), Hollingbourne, Kent (Application ref: 23/500899/OUT). The description of development is as follows:

*Outline application for the erection a building for storage and distribution (Class B8 use) with a floorspace up to 10,788sqm (Gross External Area), ancillary offices, associated car parking, HGV parking, landscaping and infrastructure (All matters reserved except for access)*

- 1.2 For reference purposes, the illustrative masterplan is presented in **Figure 1**.

#### Scope

- 1.3 A landscape and visual impact assessment (LVIA) has been submitted in support of the application (Pegasus, February 2023). The scope of work has been to:

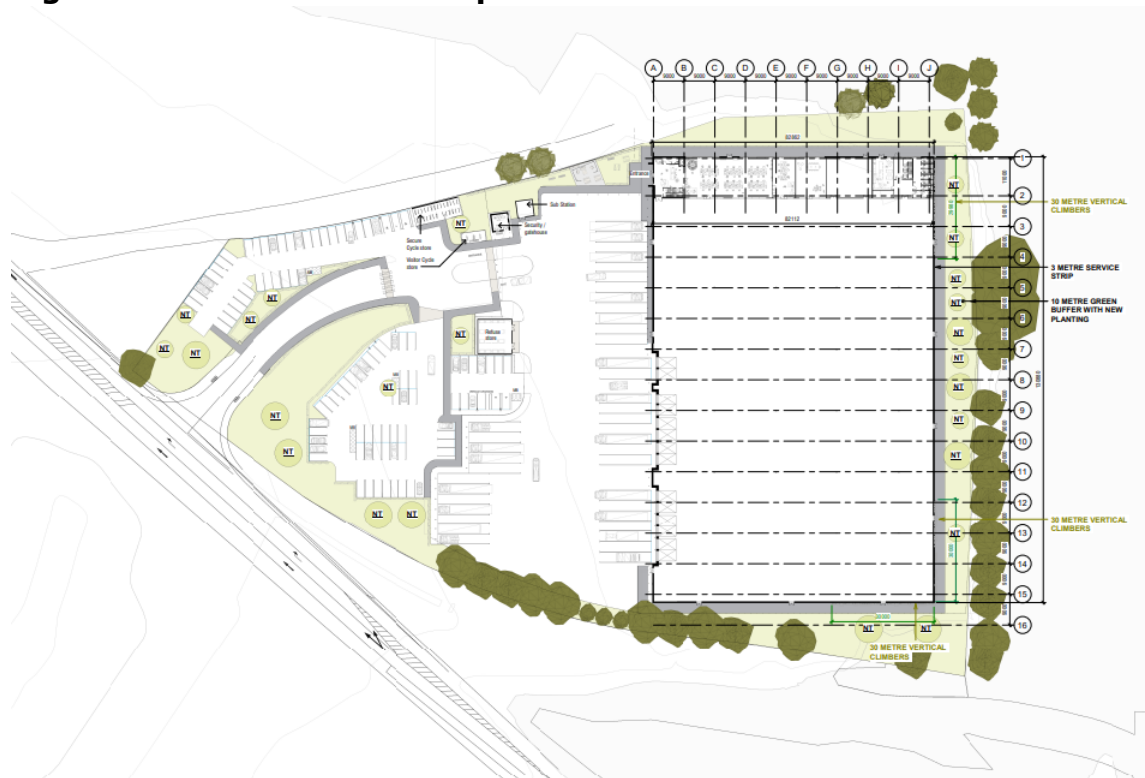
- Review the application docs/drawings/evidence base;
- Review the LVIA and comment on its compliance with best practice;
- Visit the application site and associated locations/viewpoints;
- Comment on the findings of the LVIA and whether they seem reasonable;
- Identify any concerns, queries, or potential requests for clarification or further information; and
- Provide advice to the Council (in the form of this report) setting out the conclusions of the above.

#### Limitations

- 1.4 The following limitations should be noted:

- This review does not purport to be an LVIA in its own right.
- It does not attempt to identify and categorise all the potential effects, and places a degree of reliance on the submitted material.
- The fieldwork undertaken for this review was confined to publicly-accessible locations, and only selected viewpoints were visited.
- The review has not considered the status of, or the weight to be given to, relevant policy.
- Issues such as urban design, sustainability, biodiversity or cultural heritage have not been addressed, except where these may influence landscape/visual matters.
- This report should be read in conjunction with the review of the photography, ZTV and visualizations by MS Environmental (MSE), which has been issued as a separate document.

**Figure 1: Illustrative Masterplan**



## 2. Compliance with Best Practice

2.1 The LVIA has been reviewed in terms of its compliance with the main requirements of the process as set out in GLVIA3 and prevailing practice; this is presented in **Table 1** below. Responses that raise queries or potential concerns are shown in bold and are addressed in Section 3.

**Table 1: LVIA Compliance Checklist**

Criterion	Response	Comment
1. Overall Approach		
1.1 Does the assessment distinguish between landscape and visual effects?	Yes	
1.2 Are the methodology and terminology clearly explained?	Yes	LVIA Appendix 1
1.4 Does the assessment state whether the effects are beneficial or adverse?	Yes	
1.5 Does the assessment distinguish between the effects of construction and the completed development?	<b>No</b>	Whilst this distinction is not explicit, it is assumed that construction effects would be similar to those of the Year 1 scenario.
1.6 Where a potential for adverse effects has been identified, has mitigation been proposed?	Yes	Incorporated mitigation is described in LVIA Section 3 and shown on Figure 2: Landscape Masterplan.
1.7 Has the effectiveness of this mitigation been assessed?	Yes	The effects are reported for year of completion (Year 1) and Year 15. Residual effects are identified in LVIA Section 7.
2. Presentation		
2.1 Is the LVIA clearly structured and presented?	Yes	
2.2 Is it adequately supported by:		
- Maps/plans?	Yes	
- ZTV?	<b>Partly</b>	Ref LVIA Figure 7 - see separate MSE doc.
- Photos?	<b>Partly</b>	Ref LVIA Appendix 2 - see separate MSE doc.
- Visualizations?	<b>Partly</b>	Ref LVIA Appendix 3 - see separate MSE doc.
3. Landscape Character		
3.1 Has reference been made to published LCAs at the appropriate levels?	Yes	At national (NCA), county and district levels, ref LVIA section 5.
3.2 Have the character of the site and its immediate context been adequately described?	Yes	Ref LVIA Section 5
3.3 Has its representativeness of the published character types/areas been assessed?	<b>Partly</b>	Ref LVIA Section 5 – but there is no explicit assessment against the key characteristics of the “host” character areas.

3.4 Have relevant designations been identified?	Yes	The most relevant are the Kent Downs AONB, the Len Valley Landscape of Local Value south of the A20 and (potentially) the registered parkland associated with Leeds Castle. Ref LVIA Section 5 and Figure 4: Environmental Designations Plan
3.5 Have the relevant landscape receptors been assessed?	<b>Partly</b>	Landscape receptors within the site, together with its local context and the published LCAS have been assessed. But effects on the overall site have not been explicitly reported.
3.6 Has landscape sensitivity been assessed on the basis of its susceptibility and value?	Yes	Ref LVIA Section 5.
3.7 Has the LVIA considered whether the site may form part of a valued landscape?	Yes	Ref LVIA Section 5, including evaluation of the site against the TGN02/21 criteria
<b>4. Visual Impact</b>		
4.1 Has a ZTV/ZVI been produced?	<b>Yes</b>	Ref LVIA Figure 7 – but see comments in MSE note.
4.2 Were the assessment views agreed with the LPA?	<b>No</b>	Agreement not referenced in LVIA and LPA have confirmed that none is recorded.
4.3 Are these views sufficiently representative?	<b>Partly</b>	See below and comments in MSE note.
4.4 Have seasonal influences been taken into account?	Yes	The photos were taken in December/January, and therefore represent a worst-case (i.e. maximum visibility) scenario.
4.5 Can the visualizations be relied upon?	<b>No</b>	See comments in MSE note.
4.6 Have all potential receptors been identified and their sensitivity properly assessed?	Yes	Ref LVIA Section 6.
<b>5. Policy Considerations</b>		
5.1 Does the LVIA set out the landscape policy context?	Yes	LVIA Section 8
5.2 Does the LVIA comment on the degree to which the proposed development complies/conflicts with relevant policy?	No	But this is not unusual, and is typically addressed in the applicant's Planning Statement.

### **3. Key Points Arising**

- 3.1 Whilst the LVIA has been carried out in accordance with the principles of the guidance, the following queries and potential deficiencies should be noted.

#### Absence of Explicit Assessment of Construction Effects

- 3.2 Whilst construction effects are invariably adverse (unless they involve the demolition of an unattractive structure), the effects of the works themselves are usually temporary. Permanent effects occurring during construction (e.g. changes to topography or loss of vegetation) are assumed to be assessed as part of the Year 1 scenario. The absence of an explicit assessment of construction is therefore not regarded as critical.

#### Deficiencies in ZTV

- 3.3 The MSE note identifies a number of potential deficiencies with the ZTV, relating in particular to its extent, the absence of a "bare earth" version, and the robustness of the data on which it is based. As a result, it is possible that the ZTV has under-represented the potential visibility of the development.

#### Agreement of Assessment Views

- 3.4 It is good practice to agree the assessment views with the LPA. The LVIA makes no reference to such an agreement, and the LPA has provided no evidence that this was requested.

#### Representativeness of Assessment Views

- 3.5 The assessment has been based on 16 representative viewpoints, which are shown on LVIA Figure 6: Viewpoint Location Plan. Their distance from the site may be summarized as follows: six are within a 1km radius, five within a 1-2km radius, three within a 2-3km radius and two are over 3-4km.
- 3.6 Based on the potential visibility indicated by the ZTV, which I used as a guide for my own fieldwork, this appears to be a reasonable number and distribution of views. However, in view of the MSE comments, which include reservations about viewpoint selection, it is possible that additional (and potentially more sensitive or representative) views may have been omitted.

#### Visualizations

- 3.7 Three of the viewpoints (6, 10 and 12) have been used for the preparation of photomontages. Whilst these appear to be broadly representative of short-, medium- and longer-distance views respectively, this amounts to a relatively small sample – something like double this number would have provided a more rounded understanding of the potential impact of the development. In view of the MSE comments on viewpoint selection, it cannot be confirmed that the

modelled views are sufficiently representative of the most relevant impacts of the development.

- 3.8 The MSE review also raises concerns about the reliability of the montages, in terms of their technical basis and accuracy. Its advice is that they should be treated as little more than artist's impressions, and should not be used to make judgments about the precise visibility of the development or its magnitude of impact.

#### Site's Representativeness of Published Character Types/Areas

- 3.9 The site is located within the following character areas:

- Greensand Belt regional county-level character area;
- Leeds-Lenham Farmlands local county-level character area;
- Leeds Castle Parklands borough-level character area; and
- White Heath Farmlands borough-level sub-area.

- 3.10 LVIA Figure 5: Landscape Character Plan, only shows the county-level character areas – for completeness, the borough-level areas should be added (or shown on a separate plan).

- 3.11 The LVIA states that "*the site is typical of its character area*" (LVIA 5.61). However, it is not clear which area is referred to, and whether the site's representativeness is meaningful within a borough, district or more localised frame of reference. A more explicit analysis of the degree to which the site may exhibit the key characteristics of these areas, and therefore of the degree to which it may contribute to or detract from them, would have been helpful.

## 4. Review of LVIA Findings

### Sources of Impact

4.1 Since the development is fully described in the Design and Access Statement and elsewhere, a summary of the main sources of landscape/visual impact will suffice as follows (ref Illustrative Masterplan at Figure 1):

- The current use of the site (as arable farmland) would be displaced.
- Construction would require minimal loss of existing vegetation, amounting to one category U (unretainable) tree and one category C (low quality) tree; there would be no loss of woodland or hedgerows.
- The site is gently undulating and would need to be reprofiled to accommodate the building footprint and access/parking areas.
- Vehicular access would be provided from the A20/Ashford Road in the form of a new priority junction.
- The warehouse building would occupy c38% of the site.
- This would be 15m high to parapet, with a ridged roof of three bays and hipped gables; by way of comparison, this is more than double the height of a typical two-storey house.
- A further c35% of the site would be occupied by the access road, parking and service yard.
- The remaining c27% of the site would comprise landscaped green space, including tree planting, particularly around the access road and along the eastern boundary.
- Once completed and occupied, the development would introduce lighting onto what is currently an unlit site (although the nearby sections of the A20 and M20 have street lighting), together with traffic movements (with HGVs routed to/from the M20).
- The scheme proposes a net increase in tree cover within the site, which would serve to reinforce its boundaries, and in the longer-term could reduce the visibility of the development; however, in view of the MSE comments, the precise degree of mitigation that may be achieved is arguable

## Effects on Site and Landscape Character

### *Landscape Elements (within Site)*

- 4.2 LVIA Table 3 [LVIA p52] summarizes the effects on landscape elements within the site as follows: Moderate adverse effects on land cover and topography, and moderate beneficial effects on trees/hedgerows. The effects on topography and trees/hedgerows would seem to be reasonable.
- 4.3 The predominant land cover of the site (arable farmland) would be wholly lost, amounting to a high magnitude of change [LVIA Appendix 1, Table 4]. The LVIA considers this land cover to be of low/medium sensitivity, derived from low susceptibility and low/medium value [LVIA 4.4].
- 4.4 However, it could be argued that arable farmland is of intrinsically high susceptibility to the type of development proposed in this case, and of medium value, due to its role as a characteristic of the local area and published character areas. On this basis, the land cover would be regarded as being of medium/high sensitivity, which would give rise to a major adverse effect, reflecting LVIA Appendix 2 Table 9.
- 4.5 I would therefore categorise the effects on landscape elements (within the site) as follows:
- Land use/cover: Major adverse [differs from LVIA];
  - Topography: Moderate adverse [same as LVIA];
  - Trees, scrub, hedgerows etc: Moderate beneficial [same as LVIA];
  - Water features: No change [same as LVIA]; and
  - PRoWs: No change [same as LVIA]

### *Site Character*

- 4.6 The LVIA does not explicitly aggregate the effects on the internal landscape elements to form a view as to the effect on the site as a whole. Rather, it assesses the site and its immediate context as a single landscape receptor, which it considers to be of medium susceptibility [LVIA 5.56] and medium value [LVIA 5.65], giving rise to medium sensitivity.
- 4.7 The character of individual sites can often differ to varying degrees from that of their immediate context, and that is the case here. As a parcel of arable farmland, the character of the site clearly differs from that of the Woodcut Farm employment use that is currently under construction to the north, and from that of the nearby transport infrastructure. Its intrinsic character, however, is similar to that of the "undulating farmland" that is a key characteristic of the Leeds-Lenham Farmlands LCA, and the mixed farmland remaining within the White Heath Farmlands (LCA 49-2).



- 4.8 As a result, it would have been helpful to differentiate between effects on the intrinsic character of the site, and effects on its immediate context. Reflecting the preceding discussion about its internal landscape elements, it could be argued that the effect on the site itself would be major adverse, derived from a high magnitude of change and medium/high sensitivity.

#### *Local Landscape*

- 4.9 The LVIA considers the local landscape context of the site to be of medium sensitivity, and that the development would amount to a medium/high magnitude of change, giving rise to a moderate adverse effect at Year 1, which would reduce over time as landscaping matures [LVIA 5.82].
- 4.10 The extent of this local landscape is not defined in the LVIA. However, a working definition might be something like the area within a 1km radius of the site in which the development is potentially visible. This area comprises a mix of landscape typologies, ranging from transport infrastructure and employment uses (which could reasonably be assumed to be of low sensitivity), to parts of the Kent Downs AONB and the Len Valley LLV (which must generally be assumed to be of high sensitivity – or perhaps even very high sensitivity in relation to the AONB).
- 4.11 A medium level of sensitivity overall therefore appears to be a reasonable assumption. However, on the basis of the LVIA methodology, the combination of medium sensitivity and medium/high impact would give rise to a major/moderate adverse effect, rather than a moderate effect.

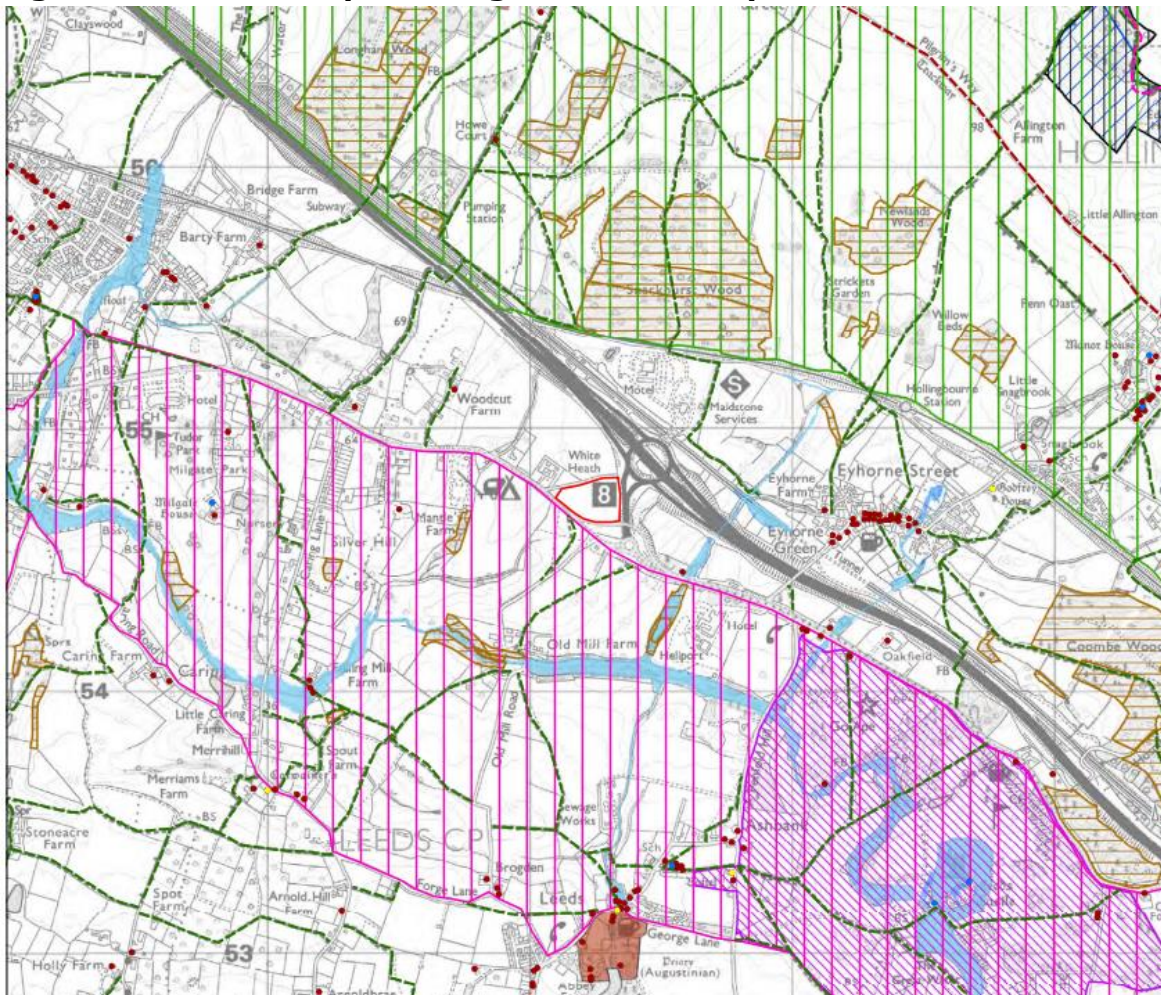
#### *Host Character Areas*

- 4.12 The LVIA concludes that the development would have a minor adverse effect on the Leeds-Lenham Farmlands LCA, resulting from a combination of low sensitivity and a low/medium magnitude of change [LVIA 5.71]. Whilst two of the key characteristics of the LCA are of low sensitivity (mineral extraction, transport corridor), the remainder are of medium or high sensitivity (undulating farmland, copses, historic parklands). It could therefore be argued that the overall sensitivity should be medium, which would give rise to a minor/moderate adverse effect.
- 4.13 The LVIA concludes that the development would have a moderate adverse effect on the White Heath Farmlands LCA (49-2), resulting from a combination of moderate sensitivity and medium magnitude of change. Whilst this appears to be a reasonable conclusion, it is noted that three of the four key characteristics of this area are of low sensitivity (major infrastructure, urban influences and modern development), and that the Woodcut Farm development has introduced further urbanising influences.

## Effects on Designated Landscapes

- 4.14 The site's relationship to the surrounding designated landscapes is shown in **Figure 2** below. This is extracted from the Environmental Designations Plan in the LVIA. The vertical green hatching shows the AONB, the vertical pink hatching the LLV, and the pink cross-hatching the registered park associated with Leeds Castle.
- 4.15 The ZTV and visualizations indicate that the development would be visible from parts of the AONB and LLV. However, the MSE review suggests that the visual influence of the development could be different to that indicated by the ZTV, whilst the three photomontages (which relate to viewpoints within these areas) should not be relied upon.

**Figure 2: Relationship to Designated Landscapes**



- 4.16 The setting of the AONB is explicitly acknowledged to be a material consideration in policy terms. Whilst this is not the case for the LLV, the latter clearly possesses a setting in terms of its inter-visibility with its surroundings, where development could potentially affect views to/from the LLV.

- 4.17 The LVIA does not explicitly assess the effects on either designated area, except to confirm that they would be indirect. Reference is made to the assessment of visual effects in Section 6, which includes an assessment of the scenic value of each view. However, it does not relate this value to the degree to which each view may contribute to an appreciation of the special qualities of the AONB or the valued characteristics of the LLV.
- 4.18 Of the six views from within the AONB, the LVIA predicts the Year 1 effects to be moderate for one, negligible-minor/moderate for two and negligible for the remaining three. Of the five views from within the LLV, the LVIA predicts the Year 1 effects to be moderate/major for one, moderate for one, minor/moderate for two and minor for one.
- 4.19 In view of the MSE comments, the reliability of these conclusions cannot necessarily be taken as read. My own observations suggest that a material effect on the setting of/views to/from the LLV cannot be ruled out. However, this is less obvious in relation to the AONB, due to the greater separation distance. The preparation of accurate versions of the visualizations would be required before this could be confirmed.
- 4.20 The ZTV indicates that the development could theoretically be visible from small areas within the registered parkland around Leeds Castle. However, no viewpoint has been selected to test this, and in the absence of an accurate visualization it is impossible to confirm whether the development would have any impact on these views.

#### Effects on Visual Amenity

- 4.21 The Year 1 effects on the 16 viewpoints, as reported in the LVIA, may be summarized as follows (all are assumed to be adverse):
- 25% would be negligible;
  - 19% would be minor;
  - 25% would be minor/moderate<sup>1</sup>;
  - 19% would be moderate; and
  - 13% would be moderate/major.
- 4.22 Whilst this distribution of effects does not seem unreasonable, the MSE comments suggest that these conclusions should not necessarily be taken as read, due to deficiencies in the photography and montages. In addition, deficiencies in the ZTV may also mean that additional or more sensitive viewpoints could have been omitted.

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<sup>1</sup> This includes two effects reported as negligible-minor/moderate

- 4.23 It should be noted that the proposed landscaping is predicted to achieve a reduction in these effects for only three out of the 16 views, which suggests that it will be of limited effectiveness.
- 4.24 The Woodcut Farm development is visible in six (38%) of the views. Where visible, the proposed development is likely to be seen in association with it. Whilst this reduces the sensitivity of the site's immediate setting, and thereby the relative impact of the development, the latter could give rise to a cumulatively harmful impact on the remaining countryside character of this setting, with the potential to be more prominent in some views than the existing employment use.

## 5. Summary and Advice to Council

### Robustness of LVIA Process

5.1 The LVIA is considered to be consistent with the principles of GLVIA3. However, reservations have been identified in relation to the following:

- Viewpoints not agreed with the LPA;
- The technical robustness of the ZTV;
- The relatively small number of visualizations (3 out of 16 views);
- The technical reliability of the photography and visualizations;
- Assessment of the degree to which the site is representative of the published LCAs;
- Absence of explicit assessment of character effect on overall site; and
- Absence of explicit assessment of effects on the settings of the AONB and LLV.

### Reliability of LVIA Findings

5.2 Taking account of the above, and other matters raised from review of the reported effects, it should be noted that:

- the ZTV may not be wholly reliable, which could have affected viewpoint selection and the visual assessment;
- the visualizations do not provide a robust basis for making judgments about precise visibility and magnitudes of effect;
- the LVIA may have under-estimated the sensitivity of/impact on land cover within the site;
- the LVIA may have under-estimated the effects on local landscape and the Leeds-Lenham Farmlands LCA; and
- the LVIA confirms that the proposed landscaping would provide a limited degree of mitigation for the adverse visual effects.

### Conclusion

5.3 The Council are advised not to take all the conclusions of the LVIA at face value, without considering the points raised in this review. In particular, the concerns

identified in the MSE note about the reliability of the ZTV and the visualizations – and thereby of the judgments made in the LVIA – should be noted.

- 5.4 The Council should form their own judgment about the acceptability of the proposals in landscape and visual terms, informed by the undisputed information in the LVIA and other application documents, and by their own perception of the potential impacts and the likely effectiveness of the mitigation.
- 5.5 Whilst an objection to the development on landscape and visual grounds might be made in relation to NPPF 174(b) and Item (1) of Local Plan policy SP17, other potential grounds are primarily matters of judgment in terms in particular of:
- the degree of effect on the setting of the AONB;
  - whether the effect on the setting of the LLV is a material consideration;
  - whether all practicable opportunities have been taken to reduce the impact of the development, and
  - the effectiveness of the proposed landscaping in terms of its ability to overcome the identified harms.

25<sup>th</sup> April, 2023

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# Land South of A20 Ashford Road, Hollingbourne

## Technical Review of ZTV, Photography and Photomontages

MS Environmental, April 2023

### Screened Zone of Theoretical Visibility

A review of the ZTV identifies the following key issues with the technique for building the model.

- A Visual Buffers ZTV should be presented alongside a bare earth ZTV. This would illustrate maximum visibility and helps define the limits of the study area. On its own, the visual buffers ZTV could include grossly inaccurate data.
- Pegasus have used National data-sets for their shape files. When checked in detail, these shapefiles are typically found to be incorrect, particularly woodland cover. This should be corrected using current hi-res aerial photography (eg aerial mastermap), checking and re-digitising as necessary.
- The Blue Sky tree data set includes single trees which on their own fail to give a visual buffer as they can be seen thru, under the canopy. The Pegasus visual buffers calculation fails to include close views from beneath the tree canopy. This simply means that the visual buffers calculations will be wrong, and rule out close views with single trees in the view.
- There is no explanation of heights used for woodland as a screen. So, for example, from Viewpoint 14 if they have the tree screen to the wrong height the shed would actually be visible from this viewpoint. This should be checked and tested with a wireline. Pegasus have failed to do this.
- A 15m high building is likely to have quite a degree of distant visibility in the surrounding landscape. Pegasus have only gone out to approximately 5km. This is the normal distance for much lower development such as solar farms (3 to 4m tall) and residential development (8m tall).
- 5km is too small for a 15m high shed. The study area should be increased to 10km radius.
- Visibility is likely to be much greater than shown in Pegasus's ZTV.

It is extremely surprising that, despite visibility shown within the grounds of Leeds Castle, no viewpoint has been included in the LVIA. This should be reviewed.

### Context Baseline Viewpoint 1

Questionable choice of viewpoint location. The road signs in the centre of the view are detractors in the image presented and a different viewpoint location without these should have been found.

The image presented fails to identify the extents of the site. The roofline of the development appears to be around 5m above eye height and would be extremely prominent in this view, in front of the distant woodland trees. As a minimum a wireline should have been presented (AVR1 or 2).

The image is presented too small on an A3 sheet, and is therefore lacking in detail. The image fails to comply with the minimum Visualisation Type 1, following LI TGN06/19.

### **Context Baseline Viewpoint 2**

Questionable choice of viewpoint. ZTV shows little view of the site. Viewpoint should be dropped and replaced with viewpoint with visibility.

### **Context Baseline Viewpoint 3**

Questionable choice of viewpoint. ZTV shows no view of the site. Viewpoint should be dropped and replaced with viewpoint with visibility.

### **Context Baseline Viewpoint 4**

Good choice of viewpoint.

This image identifies the extent of the site. The development will be extremely prominent in this view, removing the agricultural field. A photomontage should have been presented (AVR2 or 3).

The image is presented too small, and is therefore lacking in detail. The image fails to comply with the minimum Visualisation Type 1, following LI TGN06/19.

### **Context Baseline Viewpoint 5**

Poor blurred photography. Looks like aperture problems with distant woodland blurred. By moving 20 to 50 metres further north the large tree would be removed, allowing an open view towards the site that is more representative.

The image presented fails to identify the extents of the site. A wireline should have been presented (AVR1 or 2).

The image is presented too small, out of focus and lacking in detail. The image fails to comply with the minimum Visualisation Type 1, following LI TGN06/19. It illustrates very poor photography.

### **Context Baseline Viewpoint 6**

Good choice of viewpoint.

This image correctly identifies the horizontal extent of the site. The development will be extremely prominent in this view, removing the agricultural field.

The image is presented too small, and is therefore lacking in detail. The image fails to comply with the minimum Visualisation Type 1, following LI TGN06/19.

It is presented as a photomontage, with sufficient detail, although there are technical issues with the photography.

### **Context Baseline Viewpoint 7**

Good choice of viewpoint.



This image fails to identify the extents of the site. The development could be extremely prominent in this view, covering much of the horizontal extent of the view. A wireline or photomontage should have been presented (AVR1, 2 or 3).

The image is presented too small, and is therefore lacking in detail. The image fails to comply with the minimum Visualisation Type 1, following LI TGN06/19.

### **Context Baseline Viewpoint 8**

Questionable choice of viewpoint. ZTV shows a view of the site, but the photograph suggests no view. Close inspection of viewpoint location suggests it is shown in the wrong location and should be located further west along the A20.

Viewpoint should be dropped and replaced with viewpoint with visibility of site. Or present a wireline view illustrating location, scale and massing of building and whether screened by woodland or not. The ZTV suggests a view, but the photograph fails to illustrate this, probably because it is in the wrong location.

### **Context Baseline Viewpoint 9**

Poor blurred photography. Looks like combination of focus and aperture problems with distant woodland blurred.

Poor choice of viewpoint and very poor attempt to illustrate the site.

The image presented fails to identify the extents of the site. A wireline should have been presented (AVR1 or 2).

The image is presented too small, and is therefore lacking in detail. The image fails to comply with the minimum Visualisation Type 1, following LI TGN06/19.

### **Context Baseline Viewpoint 10**

Good choice of viewpoint.

This image fails to identify the extents of the site. The development will be in this view, but it is unclear how much of the horizontal extent of the view.

The image is presented too small, and is therefore lacking in detail. The image fails to comply with the minimum Visualisation Type 1, following LI TGN06/19.

It is presented as a photomontage, although there are technical issues with the photography.

### **Context Baseline Viewpoint 11**

Poor choice of viewpoint. ZTV indicates no view of the site.

Viewpoint should be dropped and replaced with viewpoint with visibility of site.

### **Context Baseline Viewpoint 12**

Good choice of viewpoint.

This image fails to identify the horizontal extents of the site. The development will be in this view, but it is unclear how much of the horizontal extent of the view.

The image is presented far too small, and is therefore lacking in detail. The image fails to comply with the minimum Visualisation Type 1, following LI TGN06/19.

It is presented as a photomontage, although there are technical issues with the photography.

### **Context Baseline Viewpoint 13**

Good choice of viewpoint.

This image fails to identify the horizontal extents of the site. The development will be in this view, but it is unclear how much of the horizontal extent of the view. A photomontage or wireline should have been presented (AVR1 or 2).

The image is presented far too small, and is therefore lacking in detail. The image fails to comply with the minimum Visualisation Type 1, following LI TGN06/19.

A single frame image should be used presented at 75mm focal length to illustrate the actual impact on this viewpoint receptor.

### **Context Baseline Viewpoint 14**

Good choice of viewpoint.

This image fails to identify the horizontal extents of the site. The development will be in this view, but it is unclear how much of the horizontal extent of the view. A photomontage or wireline should have been presented (AVR1 or 2).

The image is presented far too small, and is therefore lacking in detail. The image fails to comply with the minimum Visualisation Type 1, following LI TGN06/19.

A single frame image should be used, presented at 75mm focal length, to illustrate the actual impact on this viewpoint receptor.

### **Context Baseline Viewpoint 15**

Good choice of viewpoint.

This image fails to identify the horizontal extents of the site. The development will be in this view, but it is unclear how much of the horizontal extent of the view. A photomontage or wireline should have been presented (AVR1 or 2).

The image is presented far too small, and is therefore lacking in detail. The image fails to comply with the minimum Visualisation Type 1, following LI TGN06/19.

A single frame image should be used, presented at 75mm focal length, to illustrate the actual impact on this viewpoint receptor.

### **Context Baseline Viewpoint 16**

Poor choice of viewpoint. ZTV indicates no view of the site, although it looks like there could be a view depending on where you place the camera.

Viewpoint should be dropped and replaced with viewpoint with visibility of site. This could have been achieved by moving a few metres to the right. A pair of binoculars would have helped the photographer.

### **Context Baseline Viewpoints Generally**

The context views are presented far too small and lacking any detail. These would be helpful if presented at the 50cm viewing distance on an A1 wide x A4 sheet. It is also clear that the photographs have not been taken on a levelled tripod for any of the context or photomontage views. There is therefore incorrect geometry in the photograph and it is impossible to match the 3D model render to the Pegasus photograph.

The photography is generally very poor throughout. The distant shots have problems with exposure and lack of detail in the view.

The equipment used is good. This suggest the photographer was untrained and unable to capture the photography accurately or fairly.

### **Photomontages**

These images are presented on A1 wide sheets to comply with LI TGN 06/19. The visualisations are presented cylindrically. Pegasus present their landscaping visualisations at both Year 1 and Year 15, which is considered good practice.

All Type 3 visualisations should be presented alongside an A3 single frame reference image. None have been found in the package of LVIA information.

Whilst a tripod may have been used, it is clear that the camera was not level when the photographs were taken. The horizontal line of perspective lies in the sky in many views. This means that the 3D model render will not correctly match the photograph. It is also not evident whether the renders are cylindrical or planar to match the cylindrical photograph.

Helpfully Pegasus include eastings and northings, height and also date/time of photograph.

Poor selection of Viewpoints, with only 3 (out of 16) viewpoints presented as photomontages.

The weather appears good for all photographs, although many viewpoint photographs have the incorrect aperture or are out of focus. The resultant images are considered poor.

Only winter time photographs have been provided. Summer time could also be taken.

To accord with LI TGN 06/19, all viewpoint panoramas should be presented as 90 degrees on A1 wide x A4 high sheet. It is unclear why Pegasus have used 75 degrees.

It is unclear from all viewpoints whether a tripod has been used. All viewpoints demonstrate issues with pitch and roll, with the line of perspective in the sky on all images.

This means that the images cannot be used for producing aligned 3D model views, due to discrepancies between image geometry and the geometry of the 3D model.

### **Photomontage 6**

Either the grid co-ordinate is incorrect (582080,154460) or the photograph was taken in the field and not from the road. At this location, according to EA LIDAR DTM data, ground height is actually 56.348 mAOD. Pegasus specify 59mAOD. The resultant difference between actual camera height and the 3D model camera height is 2.652metres. This simply means that the 3D model camera location is incorrect, and the resultant visualisation will be wrong.

This suggests inadequate use of survey/GNSS equipment. The camera is in the wrong location, at the wrong height, so if the model view is based on this it is incorrect.

This can be checked and tested if helpful.

### **Photomontage 10**

The photography for this viewpoint is poor. With it being a viewpoint from distance, the camera will have captured a good image towards the site. The time of the photograph looks good. Yet the detail in the image is poor.

The line of perspective sits in the sky (like Photomontage 6) which suggests that a levelled tripod hasn't been used.

If we compare the relative vertical location of the proposed shed between Viewpoint 10 and Viewpoint 6 with the adjacent commercial units under construction, there is a clear difference in relative height. This suggests that there is no consistency between the rendered model in the view. It is difficult to understand which is correct. Or, more likely, they are both wrong to different degrees.

### **Photomontage 12**

Either the grid co-ordinate is incorrect (584581,156143) or the viewpoint position labelling is around 300metres too far to the north-east. At this location, according to EA LIDAR DTM data, ground height is actually 183.021 mAOD. Pegasus specify 186mAOD. The resultant difference between actual camera height and the 3D model camera height is 2.979metres. This simply means that the 3D model camera location is incorrect, and the resultant visualisation will be wrong.

The photography for this viewpoint is poor. With it being a viewpoint from distance, the camera will have captured a good image towards the site. The time of the photograph looks good. Yet the detail in the image is poor.

The line of perspective sits in the sky (like Photomontages 6 and 10) which suggests that a levelled tripod hasn't been used.

The model appears to sit in woodland. Checking the relative location, it appears that the model is in completely the wrong location in the view.

This is a grossly inaccurate photomontage. Pegasus should be asked to explain and justify this visualisation, as it is very clear that they have got the model in the wrong area of the photograph.

### **3D Model**

There is no technical methodology supplied which explains the accuracy of the 3D model or how it was put together. However, a review of the 3 photomontages illustrates that the technical approach by Pegasus is grossly inaccurate.

None of these photomontages give any degree of accuracy and cannot be relied upon.

A 'Type 3' visualisation will be wrong. It is unclear precisely how wrong until it has been tested. It is very clear that if Photomontage 6 is accurate, photomontage 10 is very inaccurate. Photomontage 12 has the proposed shed in completely the wrong area of the photograph. A simple visual check shows that they have located the site in a woodland over 1km to the west of its correct position.

### **Conformity with LI TGN 06/19**

The equipment used is good. The camera is full frame. The lens used is 50mm. There is no evidence of a levelled tripod being used. Camera location is given, but when checking in detail these appear to be guesstimate locations, with no evidence of accurate positioning.

The 3D modelling looks good. But the 3D model cameras are incorrect and the visualiser has not used any evidence of target points to locate the 3D model in the view.

No 50mm single frame images that the panoramic cylindrical images have been prepared from are presented as single frame Reference Images, as required by TGN 06/19.

### **Conclusion**

No reliance should be placed on the visualisations as currently presented, particularly in terms of judgments about the precise visibility of the development and its magnitude of impact.

## Land North of Ashford Road, Hollingbourne: Update to Technical Review of Visual Material

**The following update was made to the MS Environmental Technical Review following the receipt of revised material from the applicant.**

Two visualisations have been updated (Viewpoints 10 & 12). In order to check their accuracy, we built a simple 3D model, using LIDAR 2m DTM data, a finished floor level of 54mAOD and finished roof height of 69mAOD. For each viewpoint known elements in the view have been used to check the alignment of the Pegasus Visualisation.

The comments on the two new visualisations and original visualisations are as follows:

### Viewpoint 6

Assuming the co-ordinate given is correct, the angle of view is not 75 degrees. The photographs have been poorly stitched and fail to align with the landform model constructed using highly accurate LIDAR data.

If the angle of view shown is 75 degrees the viewpoint co-ordinates are incorrect.

The model render does not appear to be a cylindrical projection render. It appears to be a planar render and doesn't correctly align with the panorama.

Assuming the floor level of 54mAOD and max 15m height the current building won't break the sky-line. But any increase in height of the floor level or height of the building will break the sky-line.

This is a very poor visualisation with little technical basis.

### Viewpoint 10

Assuming the co-ordinate given is correct, the angle of view is not 75 degrees. The photographs have been poorly stitched and fail to align with the landform model constructed using highly accurate LIDAR data.

If the angle of view shown is 75 degrees the viewpoint co-ordinates are incorrect. It appears to be nearer 68 degrees.

The model view looks to be around 5m incorrect on the horizontal. The height looks reasonable.

This is a very poor visualisation with little technical basis.

### Viewpoint 12

Assuming the co-ordinate given is correct, the angle of view is not 75 degrees.

If the angle of view shown is 75 degrees, the viewpoint co-ordinates are incorrect. It appears to be nearer 80 degrees.

The model view looks correctly positioned. The height looks reasonable. The render appears to be planar not cylindrical.

MS Environmental, 30/05/2023

**From:** Peter Radmall  
**Sent:** 07 June 2023 10:30  
**To:** Richard Timms <[RichardTimms@maidstone.gov.uk](mailto:RichardTimms@maidstone.gov.uk)>  
**Subject:** Land North of Ashford Road, Hollingbourne

Richard,

Further to our telecon earlier today, I attach an update to the MS Environmental review following the receipt of revised visual material from the applicant. As you will see, reservations remain about the reliability of the photography and visualizations.

This advice has been reflected in my review of the LVIA and does not alter its conclusions.

Regards,

Peter

**Peter Radmall Associates**

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