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Date: 5 February 2008

Michael Green
Head of Development Control and Building Control
Staffordshire Moorlands District Council
Moorlands House
Stockwell Street
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Staffordshire
ST13 6HQ

Dear Sirs,

**TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
(ENGLAND AND WALES) REGULATIONS 1999
ANZIO CAMP, BLACKSHAW MOOR, LEEK, STAFFORDSHIRE**

We are writing further to your email correspondence of 4 January 2008, and subsequent telephone discussion with Stephen Miles from RPS, in relation to the forthcoming outline planning application for the above site.

The application will be supported by a package of technical supporting documents, namely:

- Sustainability Appraisal;
- Buildings Re-Use Appraisal;
- Land Quality (Contamination) Assessment;
- Land Stability Assessment;
- Water Management Assessment (including drainage / surface water flood risk assessment);
- Site Services Assessment;
- Transport Assessment (including Travel Plan);
- Environmental Impact Assessment.

As you correctly point out in the aforementioned email correspondence, whilst we have requested both Screening and Scoping Opinions from Staffordshire Moorlands District Council (SMDC), it has always been the intention of RPS to include an EIA as part of the application, the scope and content of which are outlined in greater detail below.

Scope of Environmental Impact Assessment

The process of Environmental Impact Assessment is widely recognised as being an inherent part of project development, with the identification of potential impacts, and thus the need for appropriate mitigation measures, informing the overall project design process.

Consequently, it is the intention to prepare an Environmental Statement that covers the following elements:

- Land Quality (including Geology & Hydrogeology);
- Water Resources;
- Archaeology;
- Ecology;
- Landscape & Visual Impact;
- Noise & Vibration;
- Air Quality;
- Transport.

The above components will be prepared via a combination of desk study research, site surveys and qualitative and quantitative assessments.

In our request for a Screening Opinion, it was acknowledged that the site is within a sensitive location. SMDC have subsequently reiterated this point, given the site's position within a Special Landscape Area and close proximity to the Peak District National Park, and indicated that the EIA should focus upon landscape impact issues. Consequently, the scope of the proposed Landscape and Visual Impact Assessment (LVIA) component of the ES is outlined in greater detail below.

Landscape and Visual Impact Assessment – Scope of Works

The LVIA will be undertaken in accordance with 'Guidelines for Landscape and Visual Impact Assessment (LI, 2002), Guidelines for Landscape Character Assessment (2002) Countryside Agency and other published best practice guidance. A draft of the proposed RPS methodology has been attached for your information and agreement on our approach (Appendix A).

The LVIA will comprise reports in the form of an ES Chapter supported by figures and photographs representing key viewpoints. The viewpoints will correspond to those selected for a previous LVIA carried out on the site in 2006/7 (see attached viewpoint location plan). Confirmation will be sought from the Local Planning Authority and Peak District National Park that the previously agreed viewpoints are sufficient to form the basis of the current visual appraisal. It is proposed to carry out a daytime- only assessment of the viewpoints unless otherwise instructed. Three locations were selected, as part of the 2006/7 study, for the production of photomontages. We await guidance from the Local Planning Authority in their scoping opinion, to indicate whether photomontages will be required as part of this assessment.

Landscape Character will be assessed at National, Regional and Local levels. It is anticipated that the earlier characterisation work will be used as the basis for the assessment but that a more detailed assessment of the site area itself will be carried out. The output will be supported by a series of figures including an assessment of local land use and landscape features which help to define the local character.

Mitigation and enhancement proposals will be drawn from guidance in the Staffordshire Moorlands Local Plan and the Peak District National Park Design Guide. Guidance will also be taken from other specialist reports and will demonstrate a commitment to supporting the objectives of the local Biodiversity Action Plan. An assessment of the

anticipated effects of the scheme will ultimately be provided for the winter of Year 1 (without mitigation) and summer of Year 15 (with mitigation).

Detail of design principles including materials, finishes and a landscape strategy, will be considered as part of the Outline Planning Application but will generally be in accordance with Peak District National Park Guidelines. As part of the design consultation process a draft landscape strategy is being developed to support the urban design output. This is intended to establish principles in accordance with the findings of the LVIA and an early assessment of vegetation retention and anticipated loss has been included as part of this outline strategy.

We trust that the additional information outlined above and in Appendix A are sufficient to address any outstanding queries of SMDC, and look forward to the Council providing a Scoping Opinion at their earliest convenience. We would also request that SMDC provide formal confirmation as to the acceptability of the proposed RPS LVIA methodology detailed in the attached Appendix.

If you require any further information, or have any queries in respect of this letter, please do not hesitate to contact me.

Yours sincerely
for RPS Health, Safety and Environment

A handwritten signature in black ink, appearing to read 'M. Gennaro', with a stylized flourish at the end.

Mike Gennaro
Senior Environmental Consultant

CC: Jane Curley (SMDC)
Stephen Miles (RPS Birmingham)

APPENDIX A

LANDSCAPE AND VISUAL IMPACT ASSESSMENT METHODOLOGY

Landscape and Visual Impact Assessment

Introduction

The Landscape and Visual Impact Assessment (LVIA) will consider the potential effects of the development upon:

- Individual landscape features and elements;
- Landscape character and quality (condition); and
- Visual amenity and the people who view the landscape.

Distinction Between Landscape and Visual Impacts

- Landscape and visual effects are two distinct but related areas which will be assessed separately in accordance with the approach outlined below. Landscape and visual impacts do not necessarily coincide and can be beneficial or adverse. A clear distinction will be drawn between landscape and visual impacts as follows:
- Landscape impacts relate to the effects of the proposals on the physical and other characteristics of the landscape and its resulting character and quality.
- Visual impacts relate to the effects on views experienced by visual receptors (e.g. residents, footpath users, tourist's etc) and on the visual amenity experienced by those people.

Guidance

A Landscape and Visual Impact Assessment of the proposed scheme will be undertaken by a Chartered Landscape Architect with experience of similar types of development. The assessment will be undertaken in accordance with best practice outlined in published guidance:

- *Guidelines for Landscape and Visual Impact Assessment*, 2nd Edition (2002) Landscape Institute and the Institute for Environmental Management and Assessment.
- *Landscape Character Assessment Guidance for England and Scotland* (2002) The Countryside Agency and Scottish Natural Heritage.
- *Guidelines for Environmental Impact Assessment* (2004) Institute for Environmental Management and Assessment.

Methodology

The Landscape and Visual Impact Assessment will be undertaken in a series of stages:

- Baseline data collection via desk-top, consultation and fieldwork;
- Description of the baseline landscape character and visual amenity of the site and surrounding area to identify relevant landscape and visual receptors (including key viewpoints) and determine their sensitivity to change;
- Description of the magnitude of change in the landscape and visual amenity as a consequence of the proposals;
- Description of the potential landscape and visual impacts arising from the proposals both during operation and after restoration, including temporary and permanent effects, direct and indirect effects, short term and long term effects,
- Development of mitigation proposals which will avoid or reduce adverse landscape and visual effects or provide compensation where unavoidable, and where possible enhance and safeguard beneficial effects;
- Identification of residual impacts on the landscape and visual resource;

- Evaluation of the significance of landscape and visual impacts arising from the proposals both during operation (winter and summer) and after completion (year 1 and year 15 after completion of development).

A key element of the LVIA process involves establishing the sensitivity of the baseline landscape and visual receptors. Criteria thresholds have been established to determine landscape and visual sensitivity. These are for general guidance only and the assessment will also rely on professional judgement which will be clearly explained where necessary in the ES.

The development of the scheme proposals and the EIA is an iterative process. Baseline information regarding landscape features and sensitive visual receptors, and the likely change in the landscape character and visual amenity of the site and its surroundings, will be used to identify potential impacts and inform the final scheme as appropriate.

Mitigation measures will be developed in tandem with the proposals to minimise adverse impacts as part of the iterative design process. Options for screening and integration of the scheme will be investigated and adopted as mitigation measures where appropriate.

Criteria thresholds for assessing the degree of change as a result of the scheme have been established and the final layout of the scheme will be reviewed to ascertain the magnitude of change in the landscape and in views. Visual impact on historic features of interest will also be assessed which will in turn inform the cultural heritage assessment of impact on setting of such features. Where appropriate the assessment will consider cumulative landscape and visual impacts including those arising from adjacent and nearby proposals which have planning consent or which are under construction or operation.

Landscape Assessment Methodology

Baseline Data Collection

- The scope of the assessment relates to a 5km study area as appropriate coverage to consider potential visual and cumulative impacts.
- Baseline information on the landscape will be collated including landscape character, designations, Tree Preservation Orders, Public Rights of Way, and other features of note will be gathered through a combination of desk studies, consultation and field surveys. Review of documents will include relevant planning policy documents and existing landscape character studies.
- OS maps at 1:50 000, 1:25 000 scales.

The Character of the area will be assessed at different levels using *Countryside Character Volume 5: 'West Midlands,'* (The Countryside Agency, 1999) and *Staffordshire and Stoke on Trent Structure Plan 1996-2011* (Adopted May 2001), – *Planning for Landscape Change (SPG)* as the baseline. In order to describe the character and condition of the landscape, the immediate study area will be classified into local landscape character units and for each landscape character unit, the key characteristics, condition and value attached to the area will be described.

Landscape Sensitivity

A judgement regarding the sensitivity of the landscape will be made based on the following general criteria:

Table 1: Landscape Sensitivity Criteria

Sensitivity	Criteria
Low	<ul style="list-style-type: none"> • A landscape of few positive characteristics, poor condition or one that is not particularly valued for its scenic quality. • The character of the landscape, existing land use, pattern and scale are tolerant of change and offer considerable opportunities for successful mitigation and landscape enhancement. • The landscape may be a poor example of a locally abundant landscape type.
Medium	<ul style="list-style-type: none"> • A landscape that exhibits some distinctive characteristics but may have been slightly degraded or one that is moderately valued despite its alteration. • The character of the landscape, land use, pattern and scale offers some opportunities for successful mitigation and landscape enhancement. • The landscape may be a poor example of a locally scarce landscape type or a good example of a locally abundant landscape type. • Locally designated landscapes.
High	<ul style="list-style-type: none"> • A landscape of particularly distinctive characteristics, maintained in a good condition or one that is particularly valued for its scenic quality. • The character of the landscape, existing land use, landscape features, pattern and scale are intolerant of change and offer few opportunities for successful mitigation or landscape enhancement. • The landscape may be a good example of a locally scarce landscape type. • Nationally designated landscapes.

Magnitude of Landscape Change

A judgement regarding the magnitude of change to landscape features and character will be made based on the following general criteria:

Table 2: Magnitude of landscape Change Criteria

Magnitude of change	Criteria
High	<ul style="list-style-type: none"> • Total loss of or severe damage to key characteristics, features or elements of the landscape • Introduction of highly unnatural or unattractive features into the landscape which do not fit well with the existing character • Major improvement or removal of several notable existing features or characteristics that significantly detract from the existing character • Introduction of major new features or elements into the landscape which significantly improve the existing character
Medium	<ul style="list-style-type: none"> • Partial loss of or damage to key characteristics, features or elements of the landscape • Introduction of some unnatural features into the landscape but which may be accommodated without major detriment to the existing character. • Moderate improvement or removal of some existing features or characteristics that currently detract from the existing character

	<ul style="list-style-type: none"> • Introduction of some new features or elements into the landscape which moderately improve the existing character
Low	<ul style="list-style-type: none"> • Minor loss of or alteration to one or more key characteristics, feature or elements of the landscape • Introduction of minor unnatural features into the landscape which do not detract significantly from the existing character • Minor improvement or removal of a small existing feature or characteristic that slightly detracts from the existing character • Introduction of minor new features or elements into the landscape which slightly improve the existing character
Negligible	<ul style="list-style-type: none"> • No notable loss or alteration of any key characteristics, features or elements of the landscape • No notable new features introduced into the landscape

Visual Assessment Methodology

Zone of Visual Influence

The Zone of Visual Influence (ZVI) of a scheme defines the broad scale area from within which it may be possible to see any part of the proposed works and helps to establish the potential for sensitive visual receptors. The site will not be visible outside this area or will be very difficult to perceive. However, there will still be pockets within this zone from which there are no views of the study area due to the local screening effects of vegetation or other features such as fencing. Landscape features, which form visual barriers and restrict views towards parts of the study area, such as landform, settlements and woodland, can then be evaluated and significant barriers identified to refine the baseline visibility of the proposals. Visual detractors and focal points will also be identified. The ZVI for this scheme was produced as part of an earlier application (2006/7) and is still considered to be relevant for the new scheme. A new ZVI is not proposed unless specifically requested.

Key Viewpoints

Within the extent of the ZVI, it would not be practical to illustrate the visual impact on every individual visual receptor affected by a scheme. Representative viewpoints will be used to assess the impacts on the different range of views towards the site. The following provisional list of Key Viewpoints was produced following desktop digital modelling of an initial ZVI and comprehensive consultation with the local planning authority and Peak District National Park. The locations of the Key Viewpoints are indicated on the attached plan. The assessment will comprise 10 viewpoints. The exact number and location of viewpoints will be subject to final confirmation by consultees. Viewpoints will be illustrated photographically using a 50mm lens SLR camera or digital camera. The site location and landmarks/features in the surrounding area will be identified as appropriate. Photomontage visualisations of the proposed development from a selected number of these viewpoints can be provided to illustrate the before, during and after stages of the proposals if requested by the local planning authority.

Table 3: Provisional Key Viewpoints

No	Viewpoint	Distance from Site Boundary	Directions Towards Site	Viewpoint Type	Grid Ref
1	Former public open space, now cemetery, to the edge of Leek	1.5km	North east	Residential and public space	SJ 99890, 57600
2	Meerbrook Village	2.3km	South east	Settlement, rural roads, Peak District National Park boundary	SJ 98919, 60744
3	A53 above Upper Hulme	1.8km	South west	Settlement, main highway	SK 01570, 61150
4	Beech Villa Farm	0.6km	South	Residential, main highway	SK 00717, 59447
5	Entrance to Ley Fields, above Thorncliffe Village	1km	West	Residential, local roads	SK 01722, 58718
6	A53 footpath from Troutdale Farm	0.2km	North east	Public right of way, main highway	SK 00430, 58890
7	Entrance to Blackshaw Grange on A53	10m	East	Residential, main highway and public footpath	SK 00540, 59090
8	Staffordshire Moorlands Walk, Hen Cloud, The Roaches	2.5km	South	Public footpath, Peak District National Park – recreational users	SK 00790, 61580
9	Road junction, entrance to Franklin's, Park House and Gunside	2km	East	Residential, minor roads	SJ 98334, 59609
10	Minor road junction along Morridge	2km	North west	Minor roads, Peak District National Park boundary	SK 02474, 57741

Visual receptors, including the Key Viewpoints, will be recorded in a table detailing the following information: the nature and location of the visual receptor/viewpoint, the direction and angle of the view towards the scheme, the distance from the scheme and the nature and key components within the baseline view including any details about existing visual barriers.

Visual Sensitivity

The sensitivity of visual receptors will depend on a number of factors including: the location and context of the viewpoint, the expectations and occupation of the visual receptor, the number of receptors being represented by the viewpoint and distance from the scheme. The extent of visual intrusion by any existing development may also affect the sensitivity of visual receptors in this vicinity. A judgement will be made regarding the sensitivity of baseline receptor views based on a

combination of these factors. The sensitivity of the following visual receptors is given as a guide only and other factors may also affect their sensitivity:

Table 4: Visual Sensitivity Criteria

Sensitivity	Criteria
Low	<ul style="list-style-type: none"> • Users of industrial sites, offices and commercial properties. • Users of A and B roads (except on key tourist trails). • Users of active recreational and leisure facilities where the focus is on the activity and not the landscape. • Community buildings in an urban location.
Medium	<ul style="list-style-type: none"> • Residential properties with restricted views, distant and panoramic views, oblique views, limited/partially screened views towards the scheme or surrounded by urban development. • Community buildings with a rural view. • Users of Public Rights of Way and local 'C' class roads, unclassified lanes, tracks used by non-motorised users and users of outdoor recreational facilities and public open space with restricted views towards the scheme, distant views or with views of existing urban development. • Users of local and regional tourist routes ('A' and 'B' class roads)
High	<ul style="list-style-type: none"> • Residential properties with predominantly open rural views from the curtilage, ground floor and upper floors directly towards the scheme. • Users of Public Rights of Way and local 'C' class roads, unclassified lanes, tracks used by non-motorised users which traverse open countryside with predominantly open views towards the scheme. • Users of recognised vistas and designated viewpoints. • Users of outdoor recreational facilities and public open space with open views towards the scheme at close proximity.

Magnitude of Visual Change

A judgement regarding the magnitude of change to visual amenity and Key Views will be made based on the following general criteria:

Table 5: Magnitude of Visual Change Criteria

Magnitude of Change	Criteria
High	<ul style="list-style-type: none"> • A significant deterioration or improvement in the existing view
Medium	<ul style="list-style-type: none"> • A noticeable deterioration or improvement in the existing view
Low	<ul style="list-style-type: none"> • A barely perceptible deterioration or improvement in the existing view
Negligible	<ul style="list-style-type: none"> • No discernible deterioration or improvement in the existing view

Evaluation of Landscape and Visual Impact Significance

The evaluation of residual impact significance will take into account all agreed landscape and visual mitigation measures. The significance of impacts will be graded by relating the sensitivity of the baseline landscape or view to the magnitude of change as a result of the proposed development. The following matrix outlines approximately how the significance of adverse and beneficial impacts will be determined. The criteria thresholds are for approximate guidance only, the assessment of landscape and visual impact significance will rely upon clearly explained professional judgement.

Table 6: Significance of Landscape/Visual Impacts

	Magnitude of Change in the Landscape / View			
Sensitivity of Landscape / View	<i>High</i>	<i>Medium</i>	<i>Low</i>	<i>Negligible</i>
<i>High</i>	Substantial	Substantial/ Moderate	Moderate/ Slight	Neutral
<i>Medium</i>	Substantial/ Moderate	Moderate	Slight	Neutral
<i>Low</i>	Moderate/ Slight	Slight	Slight	Neutral

Presentation of the LVIA in the Environmental Statement

The LVIA chapter of the ES will include the following sections:

1. An outline of the methodology used.
2. A description of the criteria thresholds used for assessing the baseline sensitivity of the landscape and visual amenity, the magnitude of change and the significance of impacts.
3. A review of landscape policies and designations.
4. A description of the baseline landscape and views including identification of any independent changes in the environment that may affect the landscape and views. The existing landscape will be classified into distinct character units (local landscape character areas). Their characteristics will be described and the sensitivity of each will be noted. Visual receptors will be identified and the sensitivity of each will be noted.
5. Identification of potential landscape and visual impacts.
6. A discussion of the agreed mitigation measures and a comment on the alternatives considered.
7. An assessment and evaluation of the significance of residual and cumulative impacts on the landscape and views and on landscape planning, designations and policy.

The LVIA will be supplemented by tables identifying landscape and visual receptors, and by plans and photographs illustrating the baseline situation and assessments. Where, available existing baseline data will be used. The plans are likely to comprise A3 colour sheets covering the following areas:

- Topography and drainage map.
- Landscape policies, designations and resources map.
- Map showing Landscape Character Areas from published landscape character assessments.
- Map highlighting Landscape Features (identifying existing vegetation)
- Visual analysis map (identifying visual receptor locations, visual barriers, detractors and features).
- Photographs from Key Viewpoints.

Additional material could comprise

- Production of a ZVI
- Photomontages from key viewpoints