

From:Gareth Owens
Sent:06 December 2018 17:07
To:Mike Parkes
Cc:Jan Falkingham; Planning Comments
Subject:18/00123/EIAMAJ

Dear Mike

Reference is made to the Applicant's response to the HBC Landscape Officer's assessment of the above planning application, dated 31/10/2018.

We note that AXIS, a landscape consultancy in the employ of the Applicant, does not agree with the HBC Landscape Officer's view of the landscape, or of the likely impact upon it of the proposed MSA. This is hardly surprising, given that landscape impact has been the primary reason for refusal of planning permission for an MSA at Kirby Hill for over 20 years and that the degree of landscape harm an MSA at Kirby Hill would involve has always been judged to be unacceptable at previous Public Inquiries - a position that has not been overturned at the High Court or the Court of Appeal.

In particular, we note the disagreement about the susceptibility to change of the landscape and the Applicant's statement to the effect that the Landscape Officer's comments actually relate to magnitude of change and not the sensitivity of the receptor.

For the avoidance of doubt, the sensitive receptors in the local community nearest the site have consistently, for over 20 years, advocated the view that the landscape at this location demonstrates high sensitivity and susceptibility to adverse impacts from MSA proposals and that such impacts cannot be successfully mitigated, due to the large-scale, open character of the landscape. In this respect, the local community, who know and love this landscape, agree completely with the HBC Landscape Officer.

The HBC Landscape Officer offers an independent professional opinion, based on her many years of experience of the local landscape, which is also consistent with HBC policy documentation such as the District Landscape Character Assessment. Please be advised that this assessment accurately reflects the views of local receptors, in stark contrast to the questionable opinions expressed by some Johnny-come-lately in the pay of the Applicant, who is ignoring the evidence about landscape sensitivity provided to them during community consultation and is advocating a view of the local landscape that we do not recognise.

Very substantial weight should be attached to the HBC Landscape Officer's evidence, given that it is consistent with the views of

local stakeholders and with the evidence on landscape at this site that has been tested and found to be valid at multiple Public Inquiries over the last 22 years. In our view, landscape sensitivity and the degree of landscape harm amount to an objection that is grounds for refusal on its own.

The Applicant's flimsy and biased landscape assessment, undertaken over the last 12 months, which specifically ignores the views expressed by well-informed and sensitive local receptors, is wrong and should not be given sufficient weight to overturn the well-established body of landscape evidence on which the HBC Landscape Officer relies.

Yours sincerely

Gareth

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Gareth Owens, MSc. (Oxon), MBCS, CITP
Chair, Kirby Hill RAMS