In Core Document 3.1, in paragraphs 8.4.6 - 8.4.11, the Council compares the LVIA for the Appeal Site unfavourably to a very similar LVIA produced for a greenfield Green Belt Site submitted earlier in 2021 (CD 8.5-8.7). The unfair difference in the Council's approach can be summarised, addressed and compared with the Sewell Park LVIA as follows:

- does not confirm that the assessment is based on the submitted illustrative proposed site
  layout or provide a description of the key development characteristics/parameters ... . Both
  schemes were Outline with scale, appearance, layout and landscaping reserved.
   Consequently, both LVIAs described the proposal in the text but neither included the
  respective indicative masterplan/illustrative layout. The Council's Local Requirements
   Checklist for Outline applications clearly states that a Parameter Plan is only required for
  schemes of more than 350 dwellings;
- the Zone of Theoretical Visibility ... is beneficial ... however, a "bare earth" scenario is also required. The Sewell Park LVIA didn't include a bare earth scenario either ... or even a Zone of Theoretical Visibility;
- no reference to the provision of "photomontages" ...

In fact, the LVIA clearly states: "Panoramic views were created by taking a series of overlapping photographs (overlapping by 15-30% as recommended in the Landscape Institute guidelines). These have been stitched together using Photoshop, employing the 'Realignment' method." (CD 1.17 [1.14]);

• no night-time visuals ...

Neither LVIA included night-time visuals.

photographs are from the summer only ...

The scheme was submitted in autumn 2021 and the Council chose to raise this concern in spring 2022;

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• it assesses effects upon visual receptor groups ...

Both LVIAs assess the effects upon four distinct visual receptor groups.

Please note: To assist the Appeal, a Bare Earth scenario will be provided and photographs will be taken during winter from the same 23 locations included in the LVIA.