

Written summary of oral submissions by Michael Brown at 12<sup>th</sup> May 2025 hearings

Raised the subject of the number and quality of the currently available photographs and photomontages. Project covers some 3,200 acres. 55 viewpoints were identified. At consultation there were photomontages for only 13 viewpoints selected by the Applicant. This was increased to 31 in the dDCO corresponding on average to only one photomontaged viewpoint for every 103 acres.

ExA should please consider whether 55 viewpoints and 31 photomontages are of sufficient quality and in sufficient number to provide enough information so the impact of the project can be understood by anyone looking at it. If not then I am also asking for a direction that further photographs and photomontages of the right quality should be provided.

The undulating topography, distant views, many ancient public footpaths, and a few roads all provide vistas of the countryside to thousands of residents and visitors.

Relevant requirements and guidance include:

1. Gov/PINS Guidance 8/8/24,
2. The Applicant's PEIR stated purpose
3. PINS Scoping Opinion –*APP-126, p13&14*
4. Applicant's email assurances of photomontages for all 55 viewpoints
5. Compliance with correct photographic standard – *Landscape Institute Technical note TGN 06/19 'Visual Representation of Development Proposals' for 'Type 4 Visualisation Methodology'*.
6. 2<sup>nd</sup> Gunning principle – enough for 'intelligent consideration'.

Neither the current 55 viewpoint photographs nor the 31 selected by the Applicant for photomontages meet these requirements. For example:

1. Too few viewpoints and photomontages for size of project and variety of landscape – eg *OCC:RR-0793, Hist. Eng. RR-0398 p3, Ox. Gds Tr.: RR-0794*
2. Selection of only 31 photomontages not agreed by local authorities – *emails confirming on 22/4, 16/7 and 1/8/24.*
3. Viewpoints casually sited and directed missing main impact-eg 23, 26, 27, 30
4. No attempt to show cumulative 'within project' impacts along roads or footpaths. Eg *WODC: RR-1102, para.17 and Canning RR-0919(key issue 4, & paras.2.9, 2.34, 2.37, 2.38 & 2.43*
5. Lack of photos thru. large gaps in hedging eg *Rd. between viewpoints 22 & 30.*
6. No photomontages for important viewpoints eg 22, 24, 33, 39
7. Dull photographs lack contrast - *Canning RR-0919 at 2.38, and eg 27,29, 38*
8. Photographs minimize vertical elevation – *Canning RR-0919 at 2.38*
9. No photomontages in winter at any date after yr.1
10. Excuses about wide open vistas not supported by the facts eg *viewpoints 24,39*

A full set of photographs and photomontages of the right quality is required to enable all of us to reach an informed view of the true landscape and visual impact. At RR-0919 [REDACTED], a retired Landscape Architect and Town Planner of some eminence describes the Applicant's assessment methodology, and thus conclusions of that assessment, as systemically flawed, and at paragraph 2.38 he sets out a professional description of the visualisations submitted in the LVIA

