

Overview of landscape section of Oakley Farm Pasture Slopes Environmental Statement -

Summary

The Landscape section follows a recognised GLVIA3 compliant methodology to produce the Landscape and Visual Impact Assessment (LVIA) that the effects are judged by. However many of the judgements are considered to be under reported in terms of the rating of significance of both landscape and visual effects.

The overall methodology at §2.6.6 explains that any effect that is assigned a rating of Major or Moderate would be considered as 'significant'. As the landscape section also has half grades this also means Major / Moderate ratings are significant as well.

The landscape and visual receptors that were considered to have a 'significant' effect by ES Section 6 are set down in the left hand column of the table below. The right hand column indicates the additional receptors that are considered to receive a 'significant' adverse effect.

Landscape receptors considered to receive a significant effect by ES Section 6	Additional landscape receptors considered to receive a significant effect by this review
All landscape receptors during construction (Moderate, Adverse and Temporary)** Oakley Pasture Slopes Landscape Character Area – which is effectively the site (Moderate, Adverse and Residual)**	Escarpment Landscape Character Type (Moderate, Adverse and Residual) Sloping pastures on site (Major/Moderate, Adverse and Residual) Hedges and hedgerows on site (Moderate, Adverse and Residual) Harp Hill in vicinity of new road entrance (Moderate, Adverse and Residual)
Visual receptors considered to receive a significant effect by ES Section 6	Additional visual receptors considered to receive a significant effect by this review
All visual receptors during construction (Moderate, Adverse and Temporary)** Walkers using Prow CH/86 (Moderate, Adverse and Residual)** Residents of Pillowell Close (Moderate, Adverse and Residual) Residents of Birdlip Road (Moderate, Adverse and Residual) Residents of Brockweir Road and Clearwell Gardens (Moderate, Adverse and Residual)	Users of Harp Hill Road in vicinity of new road entrance (Moderate, Adverse and Residual) Walkers on Cotswolds Way (E & NE of site) (Moderate, Adverse and Residual) Walkers on Cleeve Common (NE of site) (Moderate, Adverse and Residual) Users of B4075 Road in vicinity of Sainsbury's (Moderate, Adverse and Residual)

** - Double asterix identified those receptors that have been graded as receiving a greater degree of effect in the review than already assessed by the Applicant's advisors. Perhaps of greatest note is the reviews consideration that **Major, Adverse and Permanent** effects would occur to the Oakley Farm Pasture Slopes Landscape Character Area.

Visual effects have been under-rated in longer views from the wider AONB and from popular visitor routes such as the Cotswolds Way and Cleeve Common. The Chapter has however considered residential receptors, including those in the new housing area of Oakley Grange as well as those from publicly accessible locations in and outside the AONB.

The ES Chapter recognises the cumulative effects of the proposed development with the recent Oakley Grange houses. It uses the recent development as justification to argue that the site is now isolated from the rest of the Cotswolds AONB whereas in fact it is not due to the open, green roof of Hewlett's Reservoir.

There appears to be an over reliance on the proposed mitigation of the east to west tree belt and remnant pasture slopes being able to mitigate all adverse landscape and visual effects when they cannot. None of the residual effects on landscape and visual elements are beneficial.

The following points labelled 1 to 10 are the main findings of the detailed review of the landscape section. Comparison tables of the ES Landscape and Visual ratings have been set against this review's ratings to illustrate where differences and agreements lie.

1 - Assessment Approach and Methodology

The approach to the landscape and visual section of the Environmental Statement appears sound with a few anomalies that are summarised below. It is the first point that has the greatest effect as it appears on reading that the Cotswolds AONB is only of Regional importance when it is of National importance.

- National v Regional title for Areas of Outstanding Natural Beauty in describing landscape value associated with designations.
- Differences between main ES methodology and LVIA methodology with the LVIA generally having more half grades.
- No explanation of how IEMA diagram terminology is then turned into the Major-Moderate-Minor-Negligible assessments that are given.
- Missing how cumulative landscape and visual effects are to be considered.

2 – Planning Policy

The planning policy section identifies all the pertinent policies for the Site in terms of Cheltenham Borough Council policies from the Joint Core Strategy and NPPF. It identifies the need to comply with the Cotswolds Conservation Board's landscape strategy and guidelines for the Escarpment landscape character type.

Three points that would benefit from clarification are;

- Lack of a definitive statement as to whether the Applicant considers the site to be a valued landscape as per NPPF §170 a)
- Not all CCB strategies and guidelines are recognised in the 10 point list presented, which do they consider not applicable to this development and why?; and
- What are the visitor destinations off Harp Hill that are experiencing visitor pressure?

3 – Landscape Baseline

This is the character against which the resulting landscape effects are judged against. It recognises the current rural character of the site. However the following observations were made;

- Concentration on northern boundary in description of boundary types and relationship with surrounding built form.

- A general under-rating of susceptibility to change of the site's landscape as a whole and of the individual landscape characteristics it contains. This will manifest itself in a later lower level of sensitivity within the assessment of landscape effects.
- Disagree that the site is cut-off from the open countryside to the east as views out over Hewlett's Reservoir are readily taken from the site as are views back into the area from the escarpment to the east. The green, open and low form of Hewlett's Reservoir allows this to take place.
- The landscape character of the site should be read as a whole as it appears as a readily identifiable landscape unit and not sub-divided into lower and upper parts.

4 - Visual Baseline

The following observations are made on this section;

- The visual baselines has picked up requested viewpoints.
- The photographs are predominately winter views and some of the longer distance views are a little dark and hazy.
- My own summer photography from similar viewpoints can be used to illustrate the summer character of in the Site in these views.
- Cheltenham Circular Path viewpoints would benefit from some additional ones further to the north.
- The visual baseline considers the lower part of site is visually less prominent than the upper part rather than considering the site as a whole.
- It recognises that Hewlett's Reservoir acts as part of the green open space running east and connecting the site visually to the open countryside to the east.
- The baseline considers the surrounding area to the site is urban when Battledown Hill does not appear overtly urban in longer distance views.

5 – Assessment of likely significant effects – Construction

The construction effects have been grouped together which is acceptable in this case as a way of efficiently dealing with them for all landscape and visual receptors in a combined fashion. In summary the reviews comments include;

- The rationale behind the conclusion of **Moderate, Adverse** effects to both landscape and visual receptors during construction is not presented.
- This **Moderate, Adverse** effects is considered to be an under-reporting with the construction phase leading to **Major, Adverse** effects to the landscape and visual receptors on and in the immediate vicinity of Site and a **Moderate, Adverse** effect on visual receptors further afield.
- The construction activity effects will be temporary but their duration could be of a Medium duration of up to 5 years assuming a build rate of 50 units per year.

6 – Assessment of landscape effects

These are the permanent landscape effects and the ES reports on them between 6.4.5 and 6.4.22.

- There is a general under-reporting of landscape effects and an over reliance on the mitigating landscape effects of the proposed open pasture grass to the south of the site.
- This is the case in discussion of the landscape effects on the AONB Landscape Character Area 2d Coopers Hill to Winchcombe and the character of the Oakley Farm Slope Pastures as a landscape entity in its own right.
- The changed context that new, largescale housing would provide to landscape elements such as trees and hedgerows is not recognised
- Nor is the contribution they play in landscape character judged from distant viewpoints in the AONB.

7 – Visual Effects

The visual effects on receptors around the site and in the wider landscape is discussed between 6.4.23 and 6.4.46.

- The sensitivity of visual receptors is largely agreed.
- There are for some receptors an under reporting of the magnitude of effect after mitigation has established.
- The under-reporting of magnitude relates more to the long-distance views from elsewhere on the escarpment which in turn raises the significance of visual effects on these longer views from **Mino, Adverse** as generally stated **to Moderate, Adverse and Permanent**.
- The visual effects from nearer urban areas is generally considered appropriate with the exception of the view from Priors Road where it is considered a larger Adverse visual effect will take place.
- The proposed mitigation will have limited effect on the Adverse visual effects in long distance views from elsewhere in the AONB.
- The Cheltenham Circular Path representative viewpoints do not appear to be reflective of views from further north when views over Oakley Grange to the Site are anticipated.

8 – Mitigation and Enhancement

Mitigation discussions are split into inherent mitigation and proposed mitigation with a third section addressing the suggested enhancement measures the development would deliver.

- The inherent mitigation would only leave a narrow finger of green, open space whereas at the moment there is a considerably larger wedge of green space.
- The retention of some of the pasture will not create a rural landscape as claimed as even though it will have hedges and pasture it is too small a scale and will have the estate's access road running through it.
- The enhancements as stated are not all landscape or visual enhancement but are more targeted at recreation and access.

9 – Cumulative and In-combination Effects

Cumulative effects with Oakley Grange development is the only recent or proposed development that the site would have links with.

- Asserts the site is now an isolated parcel of land due to the Oakley Grange development. This is not agreed as the site remains open over Hewlett's Reservoir.
- Suggests that the new development would consolidate the existing Oakley Grange site but in reality consolidation should be read as enlargement, or compounding adverse landscape and visual effects and reducing remaining open green space from a wedge to a finger.

10 – Summary of effects

This section looks to combine all the individual judgements on landscape and visual receptors to give a global assessment of landscape effects and visual effects.

- General under reporting of the combined and long term landscape and visual effects.
- They would remain as at least **Moderate, Adverse and Permanent** which is higher than the assessed **Minor/Moderate, Adverse**.
- For the actual Oakley Farm Pasture Slopes landscape effect it will remain higher at **Moderate/Major, Adverse and Permanent**.
- This would take the overall landscape and visual effects into the significant, adverse effects category according to the ES Methodology.

11 – Conclusions

General conclusions including;

- A summary of overall effects are presented but for detail the main body of ES section needs to be read.
- There is no conclusion on whether the effects are significant with regards to the overall ES Methodology.
- The conclusions as presented at 6.8.12 are repeated in the ES' summary section 14.