

Land at Oakley Farm Slopes, Cheltenham

Review of landscape and visual section of Environmental Statement

Purpose of note

This note reviews Section 6 – Landscape & Visual section of the Environmental Statement (ES) that was prepared by the Applicant Robert Hitchins Homes Ltd to allow Cheltenham Borough Council (CBC) to assess the likely environmental effects of their application to build up to 250 homes at Oakley Farm Slopes.

Author

It has been prepared by Stuart Ryder, Director of Ryder Landscape Consultants who is a Chartered Landscape Architect with over 25 years' experience of working in the profession. He was appointed by CBC in August 2020 to provide comments on the proposals and review the effects described in the Landscape & Visual section of the submitted ES.

Structure of note

This note has been prepared in a series of tables that address different parts of ES Section 6;

- Table 1 – Assessment Approach & Methodology
- Table 2 – Planning Policy
- Table 3 – Landscape Baseline
- Table 4 – Visual Baseline
- Table 5 – Landscape Effects
- Table 6 – Assessment of Likely Significant Effects – Construction
- Table 7 – Visual Effects
- Table 8 – Mitigation and Enhancement
- Table 9 – Cumulative and In- Combination Effects
- Table 10 – Summary of Effects
- Conclusions – Also reproduced as a standalone note.

At the start of each table is an overview summary of each of the sections. These sections summaries are combined at the end of the note and presented with as conclusion on the effects identified. The tables uses the paragraph references from the ES but not all paragraphs need to be reviewed, whilst some are grouped together for efficiency.

Companion note

A separate note provides consultation feedback on the landscape aspects of the proposals.

Table 1 – Assessment Approach and Methodology

Overview

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.

ES Reference and Topic	Review comments
6.2 – Assessment Approach	Valid and appropriate.
6.2.2 – LVIA Methodology	Valid with the three cited guidance documents appropriate.
6.2.6 – Method of Desk Study	Appropriate and reasonable.
6.2.8 – Type 1 visualisations	ES Figure 6.1 generally complies with Type 1 visualisation and the caveat about the recently published Landscape Institute's guidance being evaluated at the time of production is noted. Further comments on photography contained in Table 4 - Visual Baseline.
6.2.12 – Landscape value	A technical point with the fact that undesignated landscapes can be classed as valued landscapes under NPPF 170a) and are not necessarily limited to moderate or low value as suggested in this paragraph. The list of value criteria follows GLVIA3 Box 5.1 used to establish landscape value. It is a moot point with regard to this LVIA as the assessment is dealing with a nationally designated AONB.
6.2.13 – Definition of landscape value	Five grades of landscape value are given along with an indication of what landscape designations fits each category. There is a confusing use of words in this list with the use of National designations being given to World Heritage Sites and Regional designations to such areas as National Parks, AONB's, The Broads and Heritage Coasts. Typically the first category is International designations and the second list is National designations as the designated areas are nationally important landscapes whose creation is generated through national legislation. To refer to AONB's as having Regional value is not a true recognition of their national value. The level of value given to AONB's in the ES approach is High on the five grade scale with only the International designation graded above at Very High. There is no Medium/Low on the scale where there is the halved grade of Medium/ High.
6.2.15 – Definition of landscape susceptibility	Definitions of three grades of susceptibility are given but no look up tables to combine value and susceptibility to create the overall

ES Reference and Topic	Review comments
	judgement of landscape sensitivity. This is undertaken later in actual descriptions of the landscape receptors.
6.2.16 – Scale of landscape sensitivity	Six point scale appears reasonable, descriptions with the Site likely falling in the High level descriptor.
6.2.17 – Magnitude of landscape effects	Explains based on professional judgement and geographical extent which is fair and reasonable. The examples of geographical extent in terms of site, short distance from site, mid-distance from site and long distance from site appears logical. Duration of 0-1, 1-10 and 10 years plus for short, mid and long term effects is reasonable. However it should be noted that the comment about mitigation becoming established in 10 years should be sense checked as certain mitigation treatments such as tree belts may have established but not be fully effective in the mitigation they are meant to provide. Finally concur that housing should be viewed as being irreversible and permanent in terms of its reversibility.
Table 6.2 – Landscape Magnitude Scale Description	Defines and six point magnitude scale for the LVIA work with half scales. This is different to Table 2.2 of the main ES methodology that is only a three point scale. This difference is not explained or how the overall effects are cross read.
6.2.18 – IEMA Diagram to judge significance of landscape effects	This appears to be different to the main Table 2.4 that is a simpler look up table where anything of Moderate or Major is deemed as a significant effect. The language used in the IEMA chart is different to Table 2.4 and no correlation between the two is given.
6.2.19 – ZTV Methodology	The ZTV methodology appears fair and reasonable but there is LiDAR data missing from the ZTV diagram (Fig 6.2) but views have been taken from this missing area so it is a minor technicality rather than making the ZTV process incorrect. It is but a tool to direct where visual assessments should be done.
6.2.20- 6.2.25 Visual sensitivity establishment	Generally sound but with reference to views in AONB as only at Regional level but does also recognise their value at national level.
6.2.26 – Table 6.3 Visual Sensitivity Definition Table	Definitions of visual sensitivity appear sound and on reading the sensitivity of the visual receptors as High or Medium-High given the Regional (National) designation of the landscape.
6.2.27 – Table 6.4 Definition of Visual Magnitude of Effect	Definitions appear sound but as a six point scale vary from the High-Medium-Low of the main methodology.
6.2.28 – Definition of the significance of visual effects	Different language used in IEMA diagram and linkage over to the wording of the Table 6.5 Definition of Significance not given. Very substantial – Substantial-Moderate-Slight-Not significant On IEMA diagram versus Major-Moderate-Minor-Negligible
6.2.29 – Table 6.5 Definition of Significance	Given position in report I initially thought that this was for visual effects alone but it also covers landscape effects. The methodology may benefit from separate tables for definition of landscape and visual effects as separate entities.
Not evident	Definition of how cumulative landscape and visual effects will be assessed in the LVIA.

Table 2 – Planning Policy

Overview

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?

ES Reference and Topic	Review comments
6.2.30-6.2.32 NPPF	Identification of §170 a) valued landscape and §172 AONB but no explicit statement whether they consider the Site's landscape as a valued landscape or not.
6.2.33 – 6.2.39 Cotswolds Conservation Board Policy	Section appears to identify all the pertinent CCB Policy & Guidelines.
6.2.39 – CCB Guidelines and Strategy points for the Escarpment landscape type	List of ten bullet points as taken from CCB Landscape Strategy & Guidelines Table 2.1 – Escarpment that actually lists 26 No in total. The fuller list includes strategies and guidelines that are relevant to the proposals including; Bullet 2 – Avoid development that will intrude negatively into the landscape and cannot be successfully mitigated Bullet 7 – Avoid developments incorporating standardised development layout, suburban style lighting, construction details and materials Some of the 26 No. bullets are not relevant but the full list is given at 6.3.7 under the Landscape Baseline section.
6.2.40 to 6.2.49 Local Landscape Planning Policies	All cited ones are relevant and none appear to be missing.
6.2.50 Development and the AONB	Recognises development must enhance the AONB and suggests that development in this location may reduce visitor pressure on local visitor destinations (designations is word used in text) accessible from Harp Hill. Are such pressures evident?
6.2.51 Recognition of Listed status for Hewlett's Reservoir	Historic importance of listing is recognised but also the landscape importance of the covered roof maintain landscape links to the east should be recognised.
6.2.52 – Setting landscape and visual objectives	All seem reasonable and do not disagree with any of them.
6.2.53 – Trees, hedges and rural character policies	Considered as broad policies and not specific to the proposed site. They are however applicable to the site as they would be to any other rural area in the borough.
6.2.54 – Overview of CCB guidelines as non-restrictive on development	This paragraph identifies that the CCB's guidelines and strategies are non-restrictive so are relevant in terms of compliance with the NPPF to allow sustainable and appropriate development. The paragraph considers that if they are followed they observed they can conserve and enhance scenic quality.

<i>ES Reference and Topic</i>	<i>Review comments</i>
	As identified at 6.2.39 above there are 26 points to the CCB's strategies and guidelines and the proposals should comply with all the relevant ones.

Table 3 – Landscape Baseline

Overview

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.

ES Reference and Topic	Review comments
6.3.1 to 6.3.3 NCA 106 Severn and Avon Vales Area	Recognises NCA 106 and lists out key characteristics but as Site is part of Cotswolds AONB and lose to NCA 107 Cotswolds then it would benefit from recognition of these characteristic as well.
6.3.4 CCB Landscape Character Area	Presentation of the CCB's description of 2d – Cooper's Hill to Winchcombe LCA.
6.3.6 – Regional value of AONB	A repeat of previous setting of only Regional value to the AONB when it is a nationally important landscape.
6.3.7 – CCB Strategy and Guideline points for Escarpment landscape character type	Out of the list of 26 points which do they consider as not relevant to the proposals?
6.3.8 – Landscape susceptibility grading	A Medium landscape susceptibility grading is given for the Site given its urban context. The reservoir is also stated as separating the Site from open countryside. This does not take into account the actual open appearance, open boundaries and green character of the reservoir which effectively appears as a flat field rather than as a large water treatment facility. My assessment of susceptibility is Medium /High because even though there are urban influences the site still appears as a series of rural fields with visual connectivity to the wider landscape when looking out from the Site and when looking back towards it.
6.3.9 – Defining Site's landscape sensitivity	The Site is termed Regional value and given a High value rating which when combined with the Medium landscape susceptibility gives a sensitivity grading of Medium-High . If my assessment of susceptibility is used at Medium/High with an agreed High grade of value for the national designated landscape the resulting sensitivity output is High .
6.3.12 – Ryder review of AONB land in Cheltenham	The review of this Landscape Character document suggests a broad brush approach that has led to a universal high susceptibility to change for all of the 42 of the AONB sites studied. This is more a reflection of their quality that was at such a level that it justified their inclusion in the AONB on the grounds of their natural beauty.

ES Reference and Topic	Review comments
6.3.13 – Pasture slopes character area	The pasture slopes are part of the overall escarpment and is a finer grain of landscape character typology used to make the report more useful. The escarpment typology No.4 is limited to just two small areas set at the very edge of the district. The CCB do not sub-divide the escarpment down into finer typologies but rather keeps the whole area as part of the escarpment that has pasture slopes set at its lower margins and woodland higher. This fact is recognised as part of 6.3.14.
6.3.17 – Settlement	Greater Cheltenham's settlement pattern is described but the fact that there is no settlement on the Site is not recorded.
6.3.18 - Boundaries	There appears to be an over focus on the degraded boundaries to the north. There are good hedgerows to other boundaries and internally to the site giving it a strong hedgerow pattern discernible in distant views.
6.3.19 – Ridge and furrow not clearly seen on survey	This is evident on site and on aerial photographs which adds to the time-depth of the site.
6.3.20 - Scale	Not sure why built boundaries are relevant to the scale of the site, or the fields it contains. It is pertinent to a description of the adjacent urban area.
6.3.21 – Built form relationship	This seems to be the better section to discuss the height and relationship of nearby buildings to the site. Again there appears to be a concentration on the more recent development to the north of the Site rather than the east, south and west boundaries.
6.3.22 – Amenity / Recreation	Correct there is no formal public access and whether the Ryder study picked up the desire lines is something I cannot confirm. Not too sure how the Site would link Harp Hill with the escarpment as there is no foreseeable direct public route to the escarpment from the Site. The use of the public open space is limited by the sloping nature of the ground and the fact the site's only access road runs through it.
6.3.23 Perceptual qualities	Medium level of tranquillity rated but Ryder report and my own recent visit would place it at Medium/High. I actually found the northern eastern part of the Site the most tranquil, not isolated as there are houses bounding the area but quieter than the road up Harp Hill with cars accelerating to climb it. The tranquillity was assisted by the mature tree stock towards the north side and the fact that buildings works adjacent to the site had ceased.
6.3.24 Landscape Value	Again reference to Regional landscape value rather than National value but agreement with High landscape value rating given to the site. I am unsure what escarpment lies to the north and this could be an error of directions. The trees not only work as a backdrop but in combination with the mature hedges contribute to longer views from the higher escarpment. No reference to value as a backdrop from Priors Road as well as the cited newer Oakley area.
6.3.27 Assessment of AONB Escarpment Landscape Susceptibility / Value and resulting Sensitivity	Susceptibility to change is considered to be High not Medium/High as it is a highly sensitive landscape type. Combined with its agreed High value as a National Landscape it returns a High degree of landscape sensitivity and not Medium/High .
6.3.28 Assessment of Oakley Farmed Pastures	Susceptibility to change is considered to be Medium/High not Medium as it is a highly sensitive landscape area but with some

ES Reference and Topic	Review comments
Susceptibility / Value and resulting Sensitivity	recognition of its settlement edge setting. Combined with it's agreed High value as a National Landscape it returns a Medium/High degree of landscape sensitivity as used at 6.4.7.
6.3.29 Land form and topography	<p>Land form is not gently rising but a notable slope that marks it as part of the broader escarpment topographical feature. Again emphasis is given to the northern boundary rather than looking at the fields as a whole, recognisable landscape area. It is suggested that Hewlett's reservoir is a block to linkages with the open landscape to the east but I found this to be open itself, well formed in terms of its grass roof and with limited boundary features to break the flow of the site's landscape into the countryside beyond. I agree that the pasture fields are not locally rare but are representative of the lower pasture slopes as illustrated on Ryder report Fig 5.</p> <p>No evidence is offered up of the land not be practical for commercial farming e.g. inability to lease.</p> <p>No mention of ridge and furrow field patterns.</p> <p>Agree that there is a High landscape value but consider there is a High susceptibility to this type of development and not Medium as suggested which will result in a High landscape sensitivity.</p>
6.3.30 – Farmstead Building	Now removed so no longer relevant but some outbuildings remain.
6.3.31 & 6.3.32 - Hedges	<p>Hedges are generally full but agree there are some gaps to the former GCHQ boundary. The hedges help form a string field pattern particularly in longer views. The south side hedge to Harp Hill is taller and is currently limiting views from the road. The MHP Arboricultural Survey indicates 11 hedgerows on site with all have a B or C classification but there is not an apparent definition of what the hedge grades mean – are they the same as the tree grades? No confirmation of whether they are considered Important Hedgerows or not under Hedgerow Regulations.</p> <p>Susceptibility is deemed as High not Medium as hedgerows, particularly inter-field hedgerows rarely fit with house patterns and when retained have a completely changed context and contribute less to the wider landscape. Value is agreed at the sub-regional level meaning a Medium-High value level giving an overall landscape sensitivity of High.</p>
6.3.33 - Trees	Generally agree with tree discussions with a High susceptibility combined with a Medium-High value that will give a High sensitivity rating.
6.3.34 – Residential Margins	No definition of width of margins which would be useful to clarify, this is later given in the assessment of effects and it is the actual houses, gardens and communal areas running up to the boundaries to north and east. Susceptibility to change is Medium / Low and value of landscape is Medium/High with Oakley and Harp Hill bordering giving an overall Medium sensitivity.
6.3.35 – Hewlett's Reservoir	The reservoir is Listed in entirety and with its open boundaries, green roof and other features such as the Listed Pavilion it would have a higher susceptibility than the suggested Medium if development had not been set against it north west corner. With

ES Reference and Topic	Review comments
	the development in place Medium susceptibility is appropriate. Combined with a value that is High given its Listed status and open, green characteristic in this part of the AONB this would lead to a Medium / High sensitivity rating.
6.3.36 – Harp Hill	Description of Harp Hill as steeply ascending and being one sided opposite the Site is accurate. The road where it is double sided with development to the west of the site is Low in both value and susceptibility. Where Harp Hill is only single sided i.e. opposite the site its susceptibility increases to High as development to the north has the potential to totally remove the undeveloped characteristic, its value would remain at Low giving an overall sensitivity of Medium .
6.3.37 - Summary	Agree that the site is predominately rural in nature. Do not fully agree with the statement that it is contained by settlement with the open element of the east boundary. Do not agree with statement that it is 'cut-off' from the wider escarpment given the green open character of Hewlett's Reservoir and open links out above it to the rest of the escarpment beyond. Argument being presented that lower down the slope and nearer to houses views out to the other escarpment is lost and urban influences increase so these parts of the site are less sensitive. The However the site reads as a whole area to me, is designated as an AONB as a whole and does not have such a dramatic change in sensitivity between the upper and lower portions of the site.
6.3.38 – Statements of landscape elements importance	Agree with identification of important features of hedgerows, trees and open pasture but not with the fact that they are only important in the upper part of the Site, they are important throughout as it is these features that give the site its overall rural character. The mature trees which are credited with being a backdrop to the more recent Oakley development along with the hedgerow pattern make a wider contribution in views from further away as well.

Table 4 – Visual Baseline

Overview

The following observations are made on this section;

- The visual baseline 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.

ES Reference and Topic	Review comments
6.3.39 to 6.3.41 Recommended viewpoints	The visual baseline has picked up the recommended viewpoints from the Scoping Opinion and the Ryder AONB LCA report. It is good to read that the Landscape Architects walked the entire lengths of roads and paths before selecting the representative viewpoints.
6.3.42 – ZTV Parameters	12.5m for building height is quite high and is typical of 2.5 storey height buildings which may come forward as part of the development. It will give a wider theoretical visibility area. 10km is again larger than typical but given the elevated nature of the site and the escarpment as it stretches to the east it is worth taking this precautionary approach.
6.3.43 – List of visual receptors	The list appears appropriate and full. It accords with the site checked or 'ground-truthed' viewpoints.
Figure 6.2 - ZTV	LiDAR missing height data so ZTV is unable to array through this area but viewpoints have been picked up so not a concern.
Fig 6.3-Fig 6.36 - Photography	<p>The photographic images have been grouped together for ease of initial comments.</p> <ul style="list-style-type: none"> • Overall if you know this part of Cheltenham and the AONB they provide a representative group of images. However see Cheltenham Circular Path comments. • It would be useful to have dates on the images to understand when they were taken. It can be worked out from leaf coverage and on occasions snow that they are winter views. • Light levels on winter photography can be difficult with very strong contrast caused by low angle sun or misty / low light levels such as Fig 6.21 and Fig 6.34. • Analytical comments on the photographs would be helpful. • The site arrow on Fig 6.16 (VP 9) makes it look like the site is part of a construction area rather than behind the houses under construction at the time of the photograph. • Summer photography would also be useful to display the site's seasonal appearance.

ES Reference and Topic	Review comments
6.3.48 – Views from Harp Hill	Agree with viewers' susceptibility being Medium High and value as High as it is within the AONB looking at other parts of the AONB. This will lead to an overall High sensitivity.
6.3.49 – Walkers on Cheltenham 86/1 to west of site	Agree with viewers' susceptibility as High and value of view as High leading to an overall High sensitivity. However I do not agree that the views are incidental as when they occur they are far more interesting with higher scenic quality than the restricted view along the path or to neighbouring properties of Wessex Drive.
6.3.50 – Walkers on Cheltenham Circular Path	Agree with High susceptibility and High value that will give a High sensitivity. However the locations of the representative viewpoints is not fully representative of the views experienced from the circular path, they may be the nearest locations but views from further north near the Priors Farm site that provide views above Oakley Grange should also be included along with the nearer ones.
6.3.51 – Walkers on the Cotswold Way	Agree with High susceptibility and High value that will give a High sensitivity. Do not agree that the Site appears surrounded by development. There is development evident to its lower north side but the single line of development to its upper south side i.e. Harp Hill properties blend into the backdrop of the wooded Battledown Hill – see also my summer photography. The green roof of Hewlett's Reservoir blends into the form of the fields and provides the continuity of open green space that aids the reading of the escarpment form as it runs into this part of Cheltenham.
6.3.52 – Walkers on Cleeve Common	As above. If anything the greater elevation from Cleeve Common makes the reading of the escarpment ridge and undeveloped land running into Cheltenham at this point even easier to see.
6.3.53 – Walkers on Aggs Hill	Agree with High susceptibility and High value that will give a High sensitivity. I do not agree that views are indirect as the combination of the green roofed reservoir and the site's open fields form the mid-ground of the view to the urban form of Cheltenham beyond. This is particularly the case for walkers coming down Aggs Hill in a SW direction when they experience a denial of views in the woodland and then have the sudden reveal of the panoramic view to Cheltenham beyond.
6.5.54 – Residents on Harp Hill	Agree with High susceptibility and High value that will give a High sensitivity.
6.5.55 – Residents on Wessex Drive	Agree with Medium susceptibility and Low value as views to the open ground of the AONB are not evident. This will give a Medium/Low sensitivity rating.
6.5.56 – Residents of Pillowell Close	Agree with Medium susceptibility but consider value to be Medium as well given there are views to the undeveloped AONB from public areas. This will give a Medium sensitivity rating.
6.5.57 – Residents of Birdlip Road	Agree with Medium susceptibility but consider value to be Medium as well given there are views to the undeveloped AONB from public areas. This will give a Medium sensitivity rating.
6.5.58 – Residents of Brockweir Road and Clearwater Gardens	Agree with High susceptibility but consider value to be Medium as there are evident views to the undeveloped AONB from public areas. This will give a Medium / High sensitivity rating.
6.5.59 – Sainsbury's / Priors Road	Agree with Medium susceptibility but consider value to be at least Medium given there are views to the undeveloped AONB from this

ES Reference and Topic	Review comments
	busy road area at the edge of town. This will give at least a Medium sensitivity rating.
6.5.60 – Footpaths off Aggs Hill	Agree with High susceptibility and High value that will give a High sensitivity. Is this the same as 6.3.53 Walkers on Aggs Hill?
6.5.51 – Visual Summary	Suggests lower parts of the Site are less visually prominent in views but I consider the whole site as prominent particularly in longer distance views e.g. 6.19 where the whole extent of the western fields (Fields 1 & 2) can be seen running down to the housing edge of Oakley. The open ground at the bottoms of the north east fields (Fields 4, 5 & 6) are less prominent given the screening provided by the mature trees in this area. Agree that the site is evident as green land running from the east taking in the green roof of the reservoir but not that it runs into the urban area given that Battledown Hill does not have an overt developed appearance. It is the urban area developed around Oakley that appears to be projecting out into the countryside.
6.5.52 – Visual Summary	<p>The character of Battledown Hill is well treed and as explained above in distant views is read as part of the rural scene and not densely settled. The recent Oakley development is highly visible given its density and contrast with the surrounding open, green space and is a good visual marker as the scale and effects of the proposals.</p> <p>The views from Harp Hill do allow an appreciation of the openness of the Site just as its openness is appreciated in distant views. The currently high roadside hedge is restricting views out to greater Cheltenham to the north but these would be likely evident when it is pruned.</p> <p>Not sure what the reference to 'In contrast' is within this sentence.</p>
6.5.53 – Visual Summary	Agree all the views are either from an urban position or have urban context within the scene. This is recognised in the CCB's description of landscape qualities for views from the escarpment.

Table 5 – Assessment of likely significant effects – Construction

Overview

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.

ES Reference and Topic	Review Comments
6.4.1 – List of likely activities	List of construction effects seems appropriate and could be added to with site concrete mixing facilities and flashing lights of construction vehicles.
6.4.2 – Mitigation of construction effects	The conservation of existing trees and hedgerows is cited as a partial mitigation measure. Many sections of hedgerow are to be removed by the proposals. The new access and construction traffic will be visible from Harp Hill.
6.4.3 – Construction effects in adjacent residential areas	Agreed these locations are in greater proximity to the proposed area of build and have less intervening vegetation to assist in the screening of views. The sloping ground is also set above the adjacent residential areas adding to the construction phase impacts.
6.4.4 – Overall assessment of construction effects	Construction effects are temporary in terms of construction activity disturbance but the outcome is permanent. There is no worked procedure for the cited Moderate Adverse effect on both landscape and visual receptors, generally they would be Major, Adverse effects on and closer to the Site and Moderate, Adverse effects further afield. The remaining hedgerows and trees will not limit effects to the immediate surroundings but they will be seen from the more distant viewpoints for the duration of the build.
Omitted information	There is no indication on the likely duration of the build programme to determine how long these temporary disturbance effects would be on the landscape and visual receptors. Given the size of the site and average build rates of between 50 and 75 units a year it could be under construction for between 3.5 to 5 years. This in terms of the durations given in the LVIA methodology at 6.2.17 addressing mitigation establishment is a Medium duration

Table 6 – Assessment of landscape effects

Overview

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.

ES Reference and Topic	Review Comments
6.4.5 – Oakley Farm Pasture different from wider escarpment	The suggestion that the Oakley Farm Pastures does not reflect the character of the wider escarpment is not the case. The sloping farm pasture character type is part of the wider escarpment landscape character. It is being argued thus to justify its lower sensitivity rating.
6.4.6 & 6.4.7 – The Escarpment LCA : 2d Coopers Hill to Winchcombe landscape effects	Initially recognises regional value which is the Nationally important AONB designation which is not mentioned by name – this in the ES carries a High level of value. It then considers the urban influences of nearby properties and reduces the sensitivity to Medium-High . A geographical size argument is presented considering the pasture loss is only small when compared to the overall size of the character area and is judged to be a Low/Negligible magnitude of effect. The reportedly small loss of sloping pasture will be balanced by restoration of a species rich grassland to the upper south side. The new south side species rich grassland will be made publicly accessible. The overall resulting landscape effect is judged to be Minor Adverse . No mention of permanence is made but this is presumed given earlier comments at 6.2.17. The review comments are; The site's sensitivity to this type of development is High as it is an AONB in a prominent location and has a rural character. The magnitude of effect does not consider its prominence and the fact that the change in landscape character to a notable green wedge running into the settlement edge of Cheltenham will be Medium/Low . The resulting landscape effects would be at least Moderate, Adverse using the IEMA look-up diagram from the methodology section and Moderate Adverse and from the 2.4 Methodology look-up table. The replacement of one grass pasture with another species rich pasture will not bring any noticeable landscape mitigation benefit, ecological benefits yes but not landscape – it will appear the same. The fact that the new pasture is accessible as public open space will not improve its landscape mitigation value – recreation value yes, but not add any to it landscape mitigation value. Finally the fact that the access road runs through the mitigation pasture reduces its landscape value as pasture and makes it subservient in character terms to the development that created it.

ES Reference and Topic	Review Comments
6.4.8 & 6.4.9 – Oakley Farm Pastures landscape effects	Agreement that the landscape sensitivity is Medium / High but consider there will be a High magnitude of change with approximately two-thirds of sloped fields being put to urban form and the remaining third denuded in character terms with the access road running through it and a strip of the remaining fields left. The remaining pasture will be open to the new development until the tree belt grows to such a height and density that it effectively screens out views from the upper slopes and with it the wider view over Cheltenham. The resulting landscape effect of this development on the Oakley Farm Pasture Slopes is Major, Adverse and Permanent .
6.4.11 & 6.4.12 – Sloping Pasture landscape effects	Sloping pasture has a High sensitivity in terms of conversion to built form, it cannot exist as a landscape entity with houses built over it. This is a half grade higher than the ES assessment. The declining condition of the pasture is I believe being overstated in the assessment with my summer site visit finding it in apparent good order, with signs of grazing and no reversion to scrub. The magnitude of change I consider to be Medium/High with loss of at least 2/3rds of the sloping pasture to housing or the tree belt. The remaining southern strips of the three main fields will not have the same landscape scale or presence from either close-up or in distant views where the existing fields form a distinctive pattern. It will have the access road running through it and it will appear next to a large urban area until the tree belt establishes. The ecological improvement to the grass type of the pasture is not a landscape mitigation. Overall the loss of sloping pasture and denuding the character of the remaining is considered to be Major / Moderate, Adverse and Permanent landscape effect.
6.4.13 & 6.4.14 – Hedges and Hedgerows landscape effects	The tree survey does not back up the statement that the internal hedgerows are in a particularly poor quality generally. This section is correct in identifying that the hedgerows contribute to the desirable characteristics of the area so generally are to be retained. However the internal hedgerow between fields 1 & 2 is to be largely removed to allow housing. Other hedgerows, including the boundary hedge to Harp Hill will have section removed to allow the access road to pass through them. Two important matters are not recognised with regard to the agricultural hedgerows on site, the first is the contribution they play in forming the notable pattern in long distance views back to site. Secondly their desirable character comes from their agricultural position next to open pasture planted to keep livestock in. With a new context of houses the retained sections of hedgerows are not as attractive as landscape features and would be lost from view between houses. The hedgerows I consider have a High sensitivity to this type of development, the magnitude of change Medium/High through hedgerow loss and change of context leading to a Major/Moderate, Adverse and Permanent landscape effect. The only hedgerows that may benefit from the suggested mitigation works of further planting and management are the retained stubs and Harp Hill boundary hedge left in the retained strip of southern pasture but they will not recreate the larger, rectilinear hedgerow pattern that is

ES Reference and Topic	Review Comments
	lost. The improvement of the pasture hedgerows will not offset the harm done to the overall hedgerow network as stated in these sections.
6.4.15 & 6.4.16 – Trees	<p>The site trees are protected by TPO's and have an open field form with broad canopies set within the pasture fields. They are attractive landscape elements in their own right and add positively to the overall landscape character. Their form and maturity is visible across the open fields and in the hedgerow bordering Harp Hill. It is the open fields that have allowed them to take this form and allow for their appreciation. Surrounding them with development, however meaningfully laid out removes them from their open field setting and changes their character to a large urban tree within a modern residential area. Their changed context is part of the magnitude of change considerations.</p> <p>The proposed new tree belt will have a totally different character to the individual mature trees. On establishment it will appear as a dense line of trees where the individual trees cannot be appreciated for their own form. The trees sensitivity is High, the magnitude of change for trees set within the housing areas would be Medium/High and for the trees along Harp Hill it would be a Low magnitude of change resulting in an overall a Medium magnitude of change. The end landscape effect would be a Moderate Adverse and Permanent landscape effect. The new tree belt may bring ecological and Green Infrastructure benefits but they are not a like for like replacement for the mature open field trees.</p>
6.4.17 & 6.4.18 – Residential Margins landscape effects	<p>Agree with Medium sensitivity of the residential margins but magnitude of effect would range from Low to High depending on the arrangement of the residential area and the amount of open ground that would be lost in proximity to the existing properties. If an average of a Medium magnitude of change is adopted this would result in a Moderate, Adverse and Permanent landscape effect. Depending on the landscape treatment of the final interface between the existing and new residential proposals this could reduce to a Minor / Moderate, Adverse and Permanent effect.</p>
6.4.19 & 6.4.20 – Hewlett's Reservoir landscape effects	<p>Hewlett's Reservoir is Listed and its landscape setting assumes a greater importance because of it. It is also correct to recognise the important link it plays between the site and the wider Cotswolds countryside. I would rate its sensitivity as Medium / High. The proposals do keep open ground to its west allowing it appreciation but its setting would be affected by the new access road curving down the slope and the into fields 5 & 6. There will also be the presence of a major block of new houses in the proximity of the reservoir until they are screened out by the proposed tree belt. Overall I judge this magnitude of change to be Medium reducing to Low on the establishment of the east west tree belt. The resulting landscape effect would start at Moderate, Adverse reducing to Minor, Adverse and Permanent for the landscape setting of the reservoir.</p>
6.4.21 & 6.4.22 – Harp Hill landscape effects	<p>This discussion is for the road users of Harp Hill and not the residents living there. At the moment Harp Hill does not benefit from extensive</p>

ES Reference and Topic	Review Comments
	<p>rural views in the location of the study area given the high site hedge that screens most out. This section is correct when it recognises the new access would introduce an urbanising feature and open up views into the site. Faith is placed in the tree belt to screen out sight to the new houses and the Oakley development but no time frame is placed on when this new landscape feature would become effective. It would also over tie screen out the long rural views to the north cited as a benefit of the new road junction. The Medium level of sensitivity is agreed with for Harp Hill but the new road access will alter its one sided, developed / undeveloped character allowing sight to and understanding of the development to the north. The magnitude of effect at the new road entrance will be Medium tailing off further away from it. This would result in a Moderate, Adverse and Permanent effect near to the road entrance reducing to Minor, Adverse and Permanent further away from the new entrance.</p>

Table 7 – Visual Effects

Overview

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.

ES Reference and Topic	Review Comments
6.4.23 & 6.4.24 – Harp Hill Visual Effects	Agree that Harp Hill road users have a Medium sensitivity but magnitude of change will be greater than the cited Low by the new road entrance and should the roadside hedge be reduced in size to an agricultural height. Range of magnitude of effect is Medium to Low leading to an overall visual effect of Moderate, Adverse at the new road entrance reducing to Minor Adverse elsewhere along the route where sight down the slope is less evident. Both levels of effects would be Permanent .
6.4.25 & 6.4.26 – Users of Cheltenham FP86 to west of site	Agree walkers on the path have a High visual sensitivity and also agree that the initial significance of effect will be High through the loss of openness and an ability to look out to the eastern escarpment such as Cleeve Common. The overall effect would be to set the majority of this path between two housing areas leading to the Major, Adverse and Permanent effect as reported. The provision of access to the pasture is not mitigation for change in views along this route as walking through the retained pasture will take path users elsewhere. Effects will remain at a Major/Moderate, Adverse with the establishment of boundary planting to the site.
6.4.27 & 6.4.28 – Walkers on Cheltenham Circular Path	Agree with High sensitivity rating for path users but not the Negligible magnitude of effect as I believe more open views are available from the path section near to the Cemetery / Priors Farm. Opportunity to look back to the site from further north should be taken.
6.4.29 & 6.4.30 – Views from the Cotswolds Way	Agree High visual sensitivity for these walkers in the AONB with views from a higher elevation the site will appear just as a small part of the overall scene. However this is to disregard the site's prominence or pattern of hedgerows that add interest back to this part of the settlement edge. I consider the magnitude of effect would be larger at Medium / Low . The resulting visual effect would be Moderate, Adverse but would remain at Moderate, Adverse and Permanent as the ability to see open, green fields is a universally more attractive

ES Reference and Topic	Review Comments
	landscape element than the built extension to Oakley. The well treed backdrop that is referred to is the proposed planting belt that will take a significant length of time to achieve any scale to act as a backdrop to the large housing area.
6.4.31 & 6.4.32 – Views on Cleeve Common	As above
6.4.33 & 6.4.34 – Walkers on Aggs Hill	Again agree walker's visual sensitivity is High given its AONB setting and leisure purpose. The magnitude of change is Medium/Low as the new road access will effectively urbanise the east end of the retained pasture that is the focus of the view above the flat topped reservoir. There will also be the southern edge of the built form visible until the tree belt has established. The extent of which is perhaps better judged from RLC VP9 that illustrates the depth of view into the site. With the access road and a portion of houses visible in front of wider Cheltenham it will appear as if the town is moving up the hill. The overall visual effect will be Moderate, Adverse and Permanent . The tree belt will eventually reduce sight to the houses lowering the significance grading to Minor, Adverse and Permanent from the access road.
6.4.35 & 6.4.36 – Harp Hill Residents	Given the elevation of the houses they will experience views to the new houses until the new tree belt forms. On growth the tree belt will screen out views the new houses but not the new access road. As the tree belt continues to grow it will screen out views over Cheltenham from Harp Hill and reduce the amount of the eastern escarpment as well. It is agreed that the residents have a High visual sensitivity but they will experience a Medium magnitude of change from first the construction of the houses and access road and then the reduction in long views to the north as the tree belt grows. This resulting visual effect is assessed to be Major/Moderate, Adverse and Permanent .
6.4.37 & 6.4.38 – Wessex Drive residents	Agreed these residents have a Medium sensitivity and will experience a Low Magnitude of Change but this results in a Minor / Moderate, Adverse and Permanent level of visual effect if the look-up table at 2.4 of methodology is followed. The paragraph reports a Minor, Adverse effect. It is unclear which piece of rural landscape can be retained through screening.
6.4.39 & 6.4.40 – Pillowell Close	Agree with Medium sensitivity rating and Medium Magnitude of Change resulting in a Moderate, Adverse and Permanent effect.
6.4.41 & 6.4.42 – Brockweir Road and Clearwater Close	The assigned susceptibility rating of Medium/High from 6.3.58 of the ES does not appear to have been carried through with a similar Medium sensitivity rating being given as per the other nearby Oakley residents, this could lead to a higher Medium/High sensitivity that when combined with the agreed Medium magnitude of change would lead to a Major / Moderate, Adverse and Permanent visual effect and not the Moderate, Adverse one reported.
6.4.43 & 6.4.44 – Birdlip Road residents	Agree with Medium sensitivity rating and Medium magnitude of change resulting in a Moderate, Adverse and Permanent effect.
6.4.45 & 6.4.46 – Priors Road	It is agreed users of Priors Road and the associated areas will have a Medium sensitivity but will experience a larger magnitude of change as the current open, green field backdrop to the area is permanently

ES Reference and Topic	Review Comments
	changed to housing. The views from here would be to the new housing development and not to the retained pasture and remove the attractive backdrop it currently provides. This would be a Medium magnitude of effect resulting in a Moderate, Adverse and Permanent effect rather than the Minor, Adverse as reported.

Table 8 – Mitigation and Enhancement

Overview

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.

ES Reference and Topic	Review Comments
8.5.1 to 8.5.4 – Inherent mitigation	<p>All of the retained elements do provide a degree of mitigation but do not offset the adverse landscape and visual effect of the development. As explained above the changed context of trees and hedgerows reduces their visual qualities as they are assimilated into the urban area in which they are located or bound.</p> <p>The point that is of particular concern is the suggestion that the retained pasture to the upper side of the site is 'broad; and will preserve the finger of green land that is seen in conjunction with the reservoir site. At a typical 85m width this will only be a 'finger' of open ground compared to the sizeable wedge that the overall undeveloped Oakley Farm Pasture Slopes presents in views to and from the AONB.</p>
8.5.5 to 8.5.7 – Proposed Mitigation	<p>The provision of a tree belt, however wide does not replace the quantum of open pasture fields changed to urban form. On effective screening which is likely to be between 20 to 30 years after planting there will be three smaller square shaped fields at the upper south side of the slope. Two of these three pasture parcels have the main access road running through them further reducing any semblance of rurality that these field remnants may hold.</p> <p>It will be a benefit to parts of the Harp Hill road route in terms of screening out sight to its own and the Oakley development but will ultimately screen out the long views over Cheltenham as well. It will not screen out sight to the access road as it runs across the steep gradient, nor any of the cut and fill roadworks required to make the road safe and reasonable to use.</p> <p>The acceptance that mitigation measures will not be able to address loss of openness in existing views from Oakley Grange but I agree there is an opportunity to replace the openness with more boundary planting to retain a green, vegetated backdrop in views out from the neighbouring development. However this is not a like for like change which why adverse landscape effects will still occur.</p>
8.5.8 to	<p>There are six enhancements suggested.</p> <p>The first describes the retained open pasture at the top of the site as a large swathe. This is not really an enhancement as there is currently a much larger swathe of pasture land existing.</p> <p>The second point regarding legal public access is a benefit as it allows open views to the north east escarpment but this will be a lesser</p>

	<p>quality view than present with the new housing in the foreground until the tree line developments.</p> <p>The third point is an extension of the second but you can see highway safety benefits in pedestrians and cyclists not using Harp Hill, however this is a recreation / transport enhancement rather than a landscape or visual enhancement.</p> <p>The fourth point is an echo of the third.</p> <p>The fifth point address restoration of hedgerows and grassland. Strictly speaking this does not need development to occur for it to happen but rather a change in land management. The improvement to remaining hedgerows and grassland is an ecological benefit and does not offset the reduction in overall hedgerow length or pattern, or the amount of pasture visible in the landscape.</p> <p>The sixth point suggests the green infrastructure runs across the middle slope when it is in fact higher up the slope reflecting the greater amount of land taken for building than is retained.</p> <p>Conservation of views, if they are conserved is not an enhancement.</p> <p>The improved settlement edge compared to Oakley Grange could be classed as an enhancement but this does not offset the wider loss of landscape character and the cumulative landscape effects of associating 250 extra housing units with Oakley Grange.</p>
--	---

Table 9 – Cumulative and In-combination Effects

Overview

- 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.

ES Reference and Topic	Review Comments
6.6.1 to 6.6.4 – List of potential developments that could have cumulative effects with	Concludes that it is just the Oakley Grange recent housing development that replaced the former GCHQ offices and campus that the site / proposals have any cumulative effects with.
6.6.5 – Oakley Grange cumulative effects	This paragraph asserts that the Oakley Grange development completed separation of the site from the open countryside and turned it into an ' <i>isolated parcel of land</i> '. The site is not separated from the AONB landscape that it is a designated part of because of Hewlett's Reservoir green roof. The Oakley Grange housing development may appear denser in parts than the GCHQ building but the latter was larger, taller and had a greater visual presence in the landscape. Even with the main office, outbuildings and car parks the site was considered worthy of AONB inclusion and in fact extension in the 1990 boundary review. The site is also at a greater scale than a parcel with three large fields and three smaller fields with each of those better fitting the term 'parcel'.
6.6 – Settlement edge position	Do not agree that the settlement edge is defined by the eastern edge of the reservoir as this disregards the openness of the reservoirs green roof.
6.7 – Extending eastwards	The development may not extend built form eastwards but it does southwards across a sizeable piece of countryside.
6.8 – Consolidating Oakley Grange settlement edge	The proposals are described as consolidating the edge of Oakley Grange when in fact they would extend them ??m further south up the escarpment slope.
6.9 – Greater cumulative effects on townscape	The cumulative effect is argued to be greater on the townscape character of the area rather than the landscape character again claiming separation from the wider rural landscape of the AONB. This separation as stated above I disagree with.
6.10 – Cumulative effects conclusions	It is concluded that development of the site will not give rise to significant adverse cumulative landscape or visual effects. I disagree with this statement and consider that both Oakley Grange and the site will lead to greater landscape effects on the area and be visually more intrusive in views from the higher escarpment to the east including from National Trails and visitor destinations with both developments being read as one larger whole.

Table 10 – Summary of effects

Overview

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.

ES Reference and Topic	Review Comments
6.7.1 & 6.7.2 - Initial and residual overall landscape effect.	Overall significance of landscape effects during construction and operation will be Moderate, Adverse and Permanent and for the site itself as described by the Oakley Pasture Slope LCA it would be Major, Adverse even after mitigation establishment. Overall landscape effects would remain at a Major / Moderate, Adverse and Permanent effect even with the development of the tree belt and amenity planting as the proposed remaining pasture does not compensate for the loss of the greater pasture areas from the local and wider landscape. It should be remembered that this a Nationally Designated landscape. The remaining pasture will have a different and lesser character particularly with the developments access road running through it.
6.7.3 – Long distance views on completion	Long-distance views are all from the AONB where the sensitivity of the visual receptor is High . The magnitude of change is between Medium and Low even for Aggs Hill and the overall resulting significance is Moderate, Adverse and Permanent . It would remain at this level even with the mitigation planting established.
6.7.4 – Short distance views on completion	Agree with Moderate, Adverse and Permanent visual effect as an overall rating for nearby visual receptors outside of the AONB with the exception of Footpath Cheltenham 86 which as stated in the ES will receive a Major, Adverse and also the section of Harp Hill in proximity to the new road entrance to site.
6.7.5 – Long distance view with mitigation	The overall visual effects will remain at Moderate, Adverse and Permanent even with 10 years of established mitigation as the tree belt and amenity planting do not mitigate the visual change in long distance views. Aggs Hill footpath users will still receive an Moderate/Minor, Adverse visual effect and Cheltenham Circular Walk users may well receive an effect from further north as discussed above.
6.7.6 – Short distance views with mitigation	The effect will remain at a Moderate, Adverse and Permanent level of visual effect.
6.7.7 – Overall landscape and visual effect	Overall the combined landscape and visual effects will remain at a Moderate, Adverse and Permanent level of effect.

Table 11 – Conclusions

Overview

- 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 summary section 14.

ES Reference and Topic	Review Comments
6.8.1 to 6.8.5 – General site description points	The site is not generally contained by development features as stated in 6.8.1 and remains open to the east and the wider AONB due to the grass roof of Hewlett's Reservoir. It is designated as part of an AONB on its own merits.
6.8.6 – Landscape susceptibility of Site and resulting sensitivity	I agree that the susceptibility level is reduced by the presence of the adjacent new residential building but I assess it as remaining at Medium/High level and not a Medium level. With a High value the resulting sensitivity rating works out to be High .
6.8.7 – Visual sensitivity variance on site	The reported reduction in visual sensitivity for the northern lower sloped area in long distance views to the site I have not found in the views from the AONB Escarpment. Therefore the overall site is considered to High visual sensitivity and not just the upper slope as suggested.
6.8.8 – Hedge, tree and pasture retention	The retention of boundary hedges does not mean that all internal hedgerows are retained and the distinctive hedgerow pattern across the whole site is lost. The retained trees and hedgerows will not limit views to the development in views from the escarpment. The retained grassland is not a significant area when compared to the width and extent of the overall site that contributes to the quality of shorter and longer views to the site. The retained grassland will conserve some of the qualities of views from Harp Hill but not all with the new access road a negative new feature and the tree screen eventually screening out sight to Cheltenham beyond.
6.8.9 – Landscape effect at Year 1 and after mitigation establishment	When combined I consider the landscape effects at Year 1 to be Major/Moderate, Adverse and not Minor Adverse due to the physical loss of pasture, hedgerows and overall rural character and a resulting change in character to the retained landscape receptors on and around site. The establishment of mitigation measures which will take longer than the projected 10 years will reduce this to an overall level of Moderate, Adverse and Permanent with the Oakley Farm Pasture Slope LCA experiencing a residual Major/Moderate, Adverse and Permanent landscape effect. Both these levels of effect fall into the significant category of the main ES methodology (Table 2.4)
6.8.10 - Visual effect at Year 1 and after mitigation establishment	Agreed that visual effects when combined are found to be Moderate, Adverse at Year 1 with a Major Adverse for walkers on Cheltenham Footpath 86 immediately adjacent to the west boundary. They will also be above Major, Adverse for users of Harp Hill near the new entrance. With established mitigation the overall visual effects will remain at Moderate, Adverse and Permanent as long distance views from escarpment will remain to the housing area instead of the rural

	field pattern and in nearer views as stated in the ES the loss of openness cannot be mitigated.
	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.
6.8.11 – Cumulative effects with Oakley Grange	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.
6.8.12 - Conclusion	Is set in full below and responses made in italicised text under each sentence.

1. The overall landscape and visual effects of the development proposals will result in the loss of sloping pasture which makes a contribution to local landscape character and visual amenity – *Agreed a loss will occur and is contribution to local landscape character and visual amenity along with it.*
2. The harm arising has been assessed and found to be limited by the extent to which the study area is already influenced by settlement features, inherent mitigation through retained vegetation and natural topography and the separation of the study site from the wider escarpment landscape and wider AONB. - *The harm has been assessed and remains at significant levels even after establishment of mitigation measures.*
3. Potential impacts are predicted to have greater landscape and visual effects on the immediate urban landscape which falls outside of the AONB than on the wider rural landscape within the AONB with exception of the study site itself. *The potential impacts will affect both immediate urban landscape and the wider rural landscape at a residual significant level. The study site which is part of the AONB will experience the greatest level of Adverse and Permanent landscape and visual effects.*
4. The study site contributes to the character and visual amenity of the AONB and to the setting of Cheltenham but not all areas of the study site make the same contribution.- *The overall site appears as a whole in longer views from the AONB and is one landscape character area.*
5. The development proposals retain the features which make the greatest contribution and have the highest sensitivity, limiting potential adverse impacts. – *This is not the case with loss of field patterns, open sloping ground, rural character and reduction of views out to Cheltenham.*
6. This confirms that the study site has capacity to accommodate development whilst conserving the wider landscape character and scenic beauty of the AONB in keeping with intentions of both national and local landscape policy.- *This does not confirm the site has capacity to accommodate development but actually the opposite that it has no capacity to accommodate this development without significant landscape harm to a nationally designated landscape and reduction in the quality of nearby visual amenity and in long-distance views from elsewhere on the Cotswolds escarpment.*

Conclusions

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 baseline 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 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.

In addition there is a summary table that outlines construction effects and cumulative and in-combination effects is presented. This has been reproduced with the Applicant's summary in blue and this review's summary in green shading to illustrate the areas of agreement and disagreement.

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.

Construction Effects Comparison Table

Receptor / Receiving Environment	Description of Effect	Nature of Effect	Sensitivity Value	Magnitude of Effect	Geographical Importance	Significance of Effects	Mitigation / Enhancement Measures	Residual Effects
Construction								
Landscape Receptors	Significant loss of tranquillity, introduction of temporary prominent features, temporary activities	Temporary	N/a	N/a	Local	Moderate Adverse	Retention of existing trees and hedgerows will provide some inherent mitigation to conserve character in conjunction with retention of higher slope open pasture	No residential construction effects
Landscape Receptors	As above plus major earthworks, temporary signage, loss of hedgerow sections, plant movement	Temporary	High	High	Local	Major Adverse	Not all hedgerows will be retained and the landscape of the site will appear as what it is – a large scale construction site for between 3.5 and 5 years.	Residual construction effect of rural landscape to urban form
Visual Receptors	Introduction of visually prominent temporary features or activities including groundworks, earth moving, temporary structures.	Temporary	N/a	N/a	Local	Moderate Adverse	Topography and retention of existing trees and hedgerows will provide inherent mitigation by screening main areas of activity.	No residential construction effects
Visual Receptors	Movement of construction vehicles, disturbance of ground works, site concrete silos, temporary staff car and van parking.	Temporary	Medium / High	Medium	Local	Major / Moderate Adverse	Not all hedgerows will be retained and the landscape of the site will appear as what it is – a large scale construction site for between 3.5 and 5 years.	Residual construction effect of houses and roads.

Amalgamated sensitivity and magnitude have not been given to explain the Moderate Adverse rating.

The temporary aspects of the construction works have not been given a duration.

Not all the mitigating factors are retained such as hedgerow and the pasture as the construction route is run through it.

The residual effect of the construction is the new development that it leads to.

Residential construction effects in Applicant's residual effects column is believed to a typographic error for residual construction effects.

No input to operation stage of proposals but rather going straight to Cumulative and In Combination effects.

Table of Landscape Cumulative and In-Combination Effects

Receptor / Receiving Environment	Description of Effect	Nature of Effect	Sensitivity Value	Magnitude of Effect	Geographical Importance	Significance of Effects	Mitigation / Enhancement Measures	Residual Effects
Cumulative and In Combination Effects								
Escarpment LCT	Small loss of area from agricultural to settlement	Permanent	Medium High	Low / Negligible	United Kingdom	Minor Adverse	Additional green infrastructure and enhancement of upper slope	Minor Adverse
Escarpment LCT	In land take it is small but from a prominent position that is noticeable from wider afield	Permanent	High	Medium / Low	National	Moderate Adverse	Green infrastructure when eventually grown will not compensate for loss of open space running down slopes.	Moderate Adverse
Oakley Farm Pasture Slopes LCA	Moderate loss of area from agricultural to settlement	Permanent	Medium High	Medium	Regional	Moderate Adverse	Additional green infrastructure and enhancement of upper slope	Moderate adverse
Oakley Farm Pasture Slopes LCA	Significant loss of area from agriculture to urban form and remaining field remnants will have reduced character	Permanent	Medium High	High	National	Major Adverse	Tree belt will take a large number of years to establish and remnant pasture areas affected by access road	Major Adverse
Sloping Pasture	Moderate loss but balanced with improvement of retained grassland	Permanent	Medium High	Medium	District	Moderate Adverse	Establishment of a permanent diverse grassland	Minor Adverse
Sloping Pasture	Significant loss and ecological improvement does not offset the loss of field's openness. Majority of sloping fields will be urban	Permanent	High	Medium / High	District	Major / Moderate	The permanent diverse grassland will be considerably smaller than existing and with access road	Major / Moderate Adverse
Hedges and Hedgerows	Some loss of poor hedge but boundaries retained and improved.	Permanent	Medium	Low	District	Minor Adverse	Reinforced and managed throughout boundaries	Minor Beneficial
Hedges and Hedgerows	Loss of intervening hedgerows between fields which establish pattern and	Permanent	High	Medium / High	District	Major / Moderate Adverse	Boundaries do not recreate hedgerow pattern nor can it address their changed	Moderate Adverse

Receptor / Receiving Environment	Description of Effect	Nature of Effect	Sensitivity Value	Magnitude of Effect	Geographical Importance	Significance of Effects	Mitigation / Enhancement Measures	Residual Effects
	create scenic interest. Majority of remaining become urban boundary hedges.						context from rural hedgerows to urban set hedges.	
Trees	Retained only loss of field setting	Permanent	Medium High	Low	District	Minor Adverse	New tree planting and long term management	Minor Beneficial
Trees	The field setting is critical to the character and appreciation of the current trees.	Permanent	High	Medium	District	Moderate Adverse	Trees on lower slopes given urban setting, trees along Harp Hill kept in open setting. New trees I pasture.	Minor Adverse
Residential margins	Change to setting predominately to setting of northern boundary.	Permanent	Medium	Low	Local	Minor Adverse	New tree and hedgerow planting to conserve setting	Minor Adverse
Residential margins	Change to setting of adjoining new residential areas – north & half of east boundary greatest effect	Permanent	Medium	Medium	Local	Moderate Adverse	New tree and boundary hedges would add separation / screening but not replace openness	Minor / Moderate Adverse
Hewlett's Reservoir	Minor change to setting	Permanent	Medium	Negligible	District	Negligible	New diverse grassland to form replacement setting	Negligible
Hewlett's Reservoir	Setting adversely changed by new road running down slopes towards it and by increased mass of housing	Permanent	Medium / High	Medium	District	Moderate Adverse	Tree line when established will screen out sight to majority of houses in the Reservoir's setting	Minor Adverse
Harp Hill	Creation of new access balanced against improvement to roadside hedgerow and new public access avoiding walking on road	Permanent	Medium	Medium	Local	Minor Adverse	Hedgerows restoration and new diverse grassland public amenity area.	Minor Adverse
Harp Hill	Hedgerow is already full and public access is a recreation / highway benefit, greatest landscape change near access point	Permanent	Medium	Medium to Low depending on position	Local	Moderate Adverse to Minor Adverse	Hedgerow already appears full but a gap where the access is proposed will remain open allowing sight to changes below.	Moderate Adverse to Minor Adverse

Table of Visual Cumulative and In-Combination Effects

Visual Receptor	Description of Effect	Nature of Effect	Sensitivity Value	Magnitude of Effect	Geographical Importance	Significance of Effects	Mitigation / Enhancement Measures	Residual Effects
Cumulative and In Combination Effects								
Users of Harp Hill Road	New access will be visible which will permit a new long distance view to be created	Permanent	Medium	Low	Local	Moderate Adverse	Restoration of hedgerow and reduction in views of existing Oakley residential area from new green infrastructure	Minor Adverse
Users of Harp Hill Road	New access will be visible but road side hedge screens sight to main development	Permanent	Medium	Medium to Low	Local	Moderate to Minor / Moderate Adverse	Harp Hill hedgerow is already strong but access section cannot be replaced, knowledge that development is beyond hedge	Moderate Adverse to Minor Adverse
Walkers PROW CH/86/1 (Immediate west of site)	New development will be experienced on the lower slope which is presently open. Extended green infrastructure will decrease some views to the east but frame new views into the retained open amenity area adjoining Harp Hill	Permanent	High	Medium	Local	Major Adverse	New green infrastructure and strengthening of hedgerow will reduce views of new built form but not replace loss of openness	Moderate Adverse
Walkers PROW CH/86/1 (Immediate west of site)	The open views across the sloping pasture to the escarpment beyond will be replaced with urban form for majority of path, upper pasture still visible from opposite but not below tree line.	Permanent	High	High	Local	Major Adverse	Views to new build will diminish as hedgerow is thickened but path will run through development on both sides for majority of sloping section past site. It will feel enclosed and only offer views at upper part.	Major / Moderate Adverse
Walkers Cheltenham Circular Walk (east	Limited changes due to existing screening. Some new development may be experienced which will be	Permanent	High	Negligible	District	Negligible	Generally screened by existing settlement features.	Negligible

Visual Receptor	Description of Effect	Nature of Effect	Sensitivity Value	Magnitude of Effect	Geographical Importance	Significance of Effects	Mitigation / Enhancement Measures	Residual Effects
and north east of site)	seen in context of existing settlement features							
Walkers Cheltenham Circular Walk (east and north east of site)	From the two representative viewpoints chosen there will be the limited change as stated but other viewpoints to north are recommended.	Permanent	High	N/A – other viewpoints suggested	District	N/A – other viewpoints suggested	Development likely to be unscreened from higher sections of path to north albeit viewed with Oakley Grange to front.	Adverse – Scale to be determined
Walkers Cotswolds Way (east and north east of the site)	Development on lower slope will be identifiable with loss of openness. New green infrastructure will be identifiable at the southern edge of new development.	Permanent	High	Low	Regional	Moderate Adverse	Development features will be reduced by new green infrastructure	Minor Adverse
Walkers Cotswolds Way (east and north east of the site)	Development visible and loss of hedgerow pattern from view, the new houses and then the tree belt will reduce views to the remnant pasture to upper fields making it a thin line of green, cumulative grouping with Oakley Grange.	Permanent	High	Medium / Low	National as a national trail	Moderate Adverse	Housing area will not be reduced by the tree belt that is the main piece of green infrastructure as it is set behind the new houses in these views.	Moderate Adverse
Walkers Cleeve Common (north east of site)	Development on lower slope will be identifiable with loss of openness. New green infrastructure will be identifiable at the southern edge of new development.	Permanent	High	Low	Regional	Moderate Adverse	Development features will be reduced by new green infrastructure	Minor Adverse
Walkers Cleeve Common (north east of site)	Development visible and loss of hedgerow pattern from view, the new houses and then the tree belt will reduce views to the remnant pasture to upper fields making it a thin line of	Permanent	High	Medium / Low	Regional and National as a national trail	Moderate Adverse	Housing area will not be reduced by the tree belt that is the main piece of green infrastructure as it is set behind the new houses in these views.	Moderate Adverse

Visual Receptor	Description of Effect	Nature of Effect	Sensitivity Value	Magnitude of Effect	Geographical Importance	Significance of Effects	Mitigation / Enhancement Measures	Residual Effects
	green, cumulative grouping with Oakley Grange.							
Walkers Aggs Hill (east of site)	Development will be generally obscured in views. With minor built for and part of the access road potentially visible.	Permanent	High	Low / Negligible	Regional	Minor Adverse	Development features will be reduced by new green infrastructure	Negligible
Walkers Aggs Hill (east of site)	Initially both the access road and the southern edge of housing will be visible and will make it look like Cheltenham housing is coming up the hill to join with the east end of Harp Hill houses.	Permanent	High	Medium / Low	Regional	Moderate	The tree line will screen out views to the housing when established as long as there is not sight along the access road through the tree belt. The access road will remain evident.	Minor Adverse
Residents Harp Hill (north of site)	New green infrastructure will obscure any existing views of urban area. Potential for part views of access road and its junction with Harp Hill.	Permanent	High	Low / Negligible	Local	Minor Adverse	New green infrastructure will screen development other than access junction with Harp Hill.	Minor Adverse
Residents Harp Hill (north of site)	The Harp Hill house are set at a higher level than the adjacent road which allows residents to readily look over the roadside hedge even from ground floor rooms.	Permanent	High	Medium	Local	Major / Moderate Adverse	Views to houses will eventually be screened out by tree line but this also screen out the longer views out over Cheltenham and associated vale.	Major / Moderate, Adverse
Residents Wessex Drive (west of site)	Potential increase in boundary vegetation will obscure glimpsed views into open field. Some residential built form may be seen beyond hedgerow.	Permanent	Medium	Low	Local	Minor Adverse	Restoration pf boundary hedgerow and new green infrastructure	Minor Adverse
Residents Wessex Drive (west of site)	Generally this housing area is internally looking with the screening to Cheltenham	Permanent	Medium	Low	Local	Minor / Moderate Adverse	Additional planting to west boundary and hedgerow	Minor Adverse

Visual Receptor	Description of Effect	Nature of Effect	Sensitivity Value	Magnitude of Effect	Geographical Importance	Significance of Effects	Mitigation / Enhancement Measures	Residual Effects
	FP86 enclosing views east to the Site and wider escarpment.						thickening will further strengthen boundary.	
Residents Pillowell Close (north of site)	Some loss of open views into lower pasture. Increase in density of green infrastructure along boundary will further obscure open views but maintain separate and green setting.	Permanent	Medium	Medium	Local	Moderate Adverse	New boundary hedgerow will reduce views of new structures but result in some loss of openness	Moderate Adverse
Residents Pillowell Close (north of site)	Loss of views and sense of openness to south and with establishment of boundary planting there will be separation depending on width and height of planting	Permanent	Medium	Medium	Local	Moderate Adverse	New boundary hedgerow will reduce sight of new homes but remove sense of openness, there will be a sense of further housing to south of Pillowell Close.	Moderate Adverse
Residents of Birdlip Road (north of site)	Some loss of open views into lower pasture. Increase in density of green infrastructure along boundary will further obscure open views but maintain separate and green setting.	Permanent	Medium	Medium	Local	Moderate Adverse	New boundary hedgerow will reduce views of new structures but result in some loss of openness	Moderate Adverse
Residents of Birdlip Road (North of site)	Loss of views and sense of openness to south and with establishment of boundary planting there will be separation depending on width and height of planting	Permanent	Medium	Medium	Local	Moderate Adverse	New boundary hedgerow will reduce sight of new homes but remove sense of openness, there will be a sense of further housing to south of Pillowell Close.	Moderate Adverse
Residents Brockweir Road and Clearwell Close	Some loss of open views into lower pasture. Increase in density of green infrastructure along boundary will further	Permanent	Medium	Medium	Local	Moderate Adverse	New boundary hedgerow will reduce views of new structures but result in some loss of openness	Moderate Adverse

Visual Receptor	Description of Effect	Nature of Effect	Sensitivity Value	Magnitude of Effect	Geographical Importance	Significance of Effects	Mitigation / Enhancement Measures	Residual Effects
(North of site)	obscure open views but maintain separate and green setting.							
Residents Brockweir Road and Clearwell Close (North of site)	Loss of views and sense of openness to south and with establishment of boundary planting there will be separation depending on width and height of planting	Permanent	Medium	Medium	Local	Moderate Adverse	New boundary hedgerow will reduce sight of new homes but remove sense of openness, there will be a sense of further housing to south of Pillowell Close.	Moderate Adverse
Users of the B4075 Road Sainsbury's junction (North west of site)	Some loss of open green field will be seen both from introduction of new built form and extensive new green infrastructure planting.	Permanent	Medium	Low	Local	Minor Adverse	New green infrastructure will soften views of new built for but loss of openness cannot be mitigated	Minor Adverse
Users of the B4075 Road Sainsbury's junction (North west of site)	Definite sense of loss of green, verdant backdrop to views from Prior Road and environs. A sense of new housing running up the face of the hill. The tree line would be set behind the new houses in this view.	Permanent	Medium	Medium	Local	Moderate Adverse	The mitigation treatment of the north west corner of the site will influence how much of the housing in the large Field 1 & Field 2 is visible. This area is currently indicated to be the SuDS basin location.	Moderate Adverse