

Oakley Farm Appeal – REF: APP/B1605/W/21/3273053

ALTERNATIVE ILLUSTRATIVE MASTERPLAN AND SUPPORTIVE
EVIDENCE

LANDSCAPE AND HERITAGE OBSERVATIONS FROM LOCAL PLANNING
AUTHORITY, CHELTENHAM BOROUGH COUNCIL

1 Observations:

- 1.1 These observations are made in response to the alternative masterplan and supporting landscape commentary submitted by the appellant on 12th October 2021 together with the subsequent additional photo montages. (Verified views and methodology by Andy Maw Design dated 12th November 2021.
- 1.2 The Appellants claim that the alternative masterplan and revised photo montages demonstrate that the site remains capable of accommodating this scale and form of development with the same landscape and visual mitigation objectives if GCCs preferred gradients are conditioned.
- 1.3 These observations focus on landscape and heritage issues only and are intended to assist the Inspector. For ease of reference the LPA's observations follow the ordering contained within the Appellant's accompanying supporting statement to the alternative masterplan.

2 Landscape

- 2.1 The access roads will be accommodated by means of an embankment platform from the junction with Harp Hill and cutting into the existing slope at various locations to achieve the desired gradients. Where the existing slope will be cut, the resulting batter will not exceed a 1 in 3 gradient. The resultant slope which can be managed as grassland. The LPA consider that it is important to bear in mind that a 1 in 3 gradient is the steepest gradient possible to allow grass maintenance with typical grass cutting equipment; shallower gradients are preferred for both aesthetic and maintenance requirements. The resulting heavily altered landform will appear as engineered and unnatural in the most sensitive area of the site, cutting through and across the upper slopes.
- 2.2 The Appellant considers that excessive engineering operations would not be required although some earth working operations, in addition to those within the area of built

form, will take place to form the new access road – referred to as the Eastern Road in the additional information. The LPA consider that creating an embankment up to 2.3m high and approximately 70m long and cuttings up to 2.8m deep and approximately 240m long in a visually sensitive area of land within an AONB is excessive.

- 2.3 The Appellants continue to claim that any landscape and visual harm is contained within the site and that the revised proposals do not go beyond the original assessment. However, the Appellants original position included a claimed compensatory offset to the harm caused to the access road due to additional views being provided to Cleeve Common. The LPA consider the updated VVI Fig 5 shows that this not to be the case with the tree belt planting largely screening sight of the Cotswold escarpment. The LPA consider that in terms of the access road the alternative masterplan shows a greater negative landscape and visual impact and consequently the Appellants contention that the revised arrangements would not be detrimental to the delivery of the site is unsound.
- 2.4 The Appellants seeks to maintain that the illustrative network of paths remain virtually unchanged and the design intention to achieve an open space of natural appearance remains practical and achievable. The LPA submits that this is clearly not the case. The intention to create an open space of natural appearance is not achievable with the initial presence of housing to the north of the open space and the long-term presence of the access road with its associated earthworks, streetlights, any barriers and fences bisecting the space. In respect of the network of paths a layer of detail is missing from their design such as ramps to lead the southern path up onto the access road platform, or steps and ramps down into the cutting of the access road. All of these detract from the natural appearance of the space creating an artificial and urban environment.
- 2.5 The alternative proposal has a reduced amount of tree planting along the proposed route of the access roads because the Appellant claims the deep cutting will mitigate the effects of vehicles using the road. The LPA believe the cutting will screen smaller

vehicles but not taller vans or HGV's that have to access the site. This may have the result of drawing the attention of visual receptors to vehicle movements as the disappearance and re-appearance of vehicles will look out of place. It also should not be overlooked that the top of the cutting will need to be protected with a highway fence which will break up the space further and appear uncharacteristic in the AONB landscape. Although the Appellant is retaining trees on the first road bend off Harp Hill these will not screen the accompanying highway street furniture and lighting which will be required of an access road for up to 250 houses.

2.6 The Appellants concede that the cutting of the access road into the natural slope will result in operational phase landscape and visual effects albeit they will be no greater than those originally assessed. The LPA disagree, there is no clear consideration of cutting or engineered slopes in Application LVIA or ES and it would lead to a permanent, adverse effect to the remnant open space and AONB pasture landscape. This landscape effect has been taken into account by Mr Ryder in his Proof at Tables 3 and 5 – Negative landscape effects and negative visual effects arising from the development:

- Landscape Negative 1 – Breaking up the slope
- Landscape Negative 7 – Modified landform
- Landscape Negative 11 – Landscape character of the remaining open space
- Visual Negative 2 – Visual change to Harp Hill caused by the Site entrance

2.7 Additionally, the Appellants overlook the impact of the change in landform rather stating that the grass swards will conceal any adverse impact, once established. This approach ignores the fact that, despite the grass cover, the underlying form of the engineered slopes will still be readily evident and appear uncharacteristic in the former pasture fields. In longer range views the loss of the pasture fields is a larger adverse visual effect; the developing tree belt will reduce views to the upper part of the fields which are claimed visual mitigation for the loss of open land. Mr Ryder considers that the engineering landform as presented on the VVI images has

confirmed that the road corridor would significantly alter the character of the remaining open space as expressed in his Proof (CD C16-C) in Table 3 – Negative landscape effects arising from the development.

2.8 The alternative illustrative masterplan retains the openness of the upper slope but effectively a large access road with a wider engineered form bisecting the open space will appear nonnatural. The entrance platform will block views for people walking along the main upper path and on the informal paths running towards it. The new setting for the listed parts of Hewletts Reservoir will be in a suburban, edge of town setting rather than the largely rural one that they currently have.

2.9 It is recognised the alternative illustrative masterplan remains an illustrative drawing only with detailed landscape proposals such as species type, planting size, planting location and long-term management being reserved matters. The LPA submit it is important to realise that some changes to the landscape cannot be addressed simply through more planting. Major landform re-modelling and loss of open, rural pasture are two of them. It is the fundamental loss of attractive landscape from the AONB that needs to be assessed by the Inspector as he determines the Appeal.

3 Heritage

3.1 The revised masterplan shows a significant change from that presented to the inquiry and moves proposed roads to new routes and new levels. The most significant changes in terms of their impact on heritage assets lie in the south-east corner of the site. The plan extracts below show these changes.



Above: Extract from the original illustrative masterplan showing the south-east part of the appeal site (Drawing 333.P.3.9, dated 01/08/2019)



Above: Extract from the Appellants revised masterplan showing the south-east part of the appeal site

(Drawing 18017.202B dated 05/10/2021)

3.2 The principal changes in the revised masterplan insofar as they affect the setting of heritage assets are as follows:

- After the entrance road divides into east and west branches, the eastern branch is set into a cutting
- A wider breach is shown in the existing hedge between fields 2 and 3.
- The dense tree planting previously shown on either side of the eastern branch has been removed
- The majority of the tree planting beside the footpath which adjoins the reservoir complex on the eastern boundary of the site has been deleted
- The point at which the eastern branch road descends into the housing development has been moved slightly further away from the reservoir complex.

4. Impacts on Heritage Assets

- 4.1 The road entering the site from Harp Hill and its associated engineering works would detract from the rural setting of the listed pavilion and the listed boundary wall as it crosses the upper pasture slopes and approaches the Reservoir site. When stood on top of Reservoir No.3 or next to the Pavilion, vehicles entering the site would be visible as they traverse the raised embankment. The eastern branch of the access road will be less visible where set into a cutting, however traffic movement will still be visible and audible, even if the road surface itself is not. Furthermore, any infrastructure associated with the road - not yet defined but likely to include kerbs, turning places, crossing points, signage and lighting – would further detract from the rural setting of the designated heritage assets.
- 4.2 During the inquiry, the impact on ridge and furrow was contested. The LPA view remains that the development will result in the erasure of a large area of medieval ridge and furrow across the appeal site; indeed, the impact of engineering works associated with the access road are even greater than previously anticipated due to the need for the raised embankment and cutting of the eastern branch.

4.3 Removal of much of the proposed tree planting in the south-east corner of the site in proximity to the Reservoir complex will lessen an adverse impact previously identified in Mr Holborow's Proof of Evidence.

5 Comments on the revised VVIs

General comments

They do not show:

- Highway markings;
- Street furniture specifically highway lighting, road name signs, road signs such as give way, grit bins, pedestrian refuges, keep left illuminated bollards and the like that will be required by a detailed scheme.
- There is no population of vehicles or pedestrians in the VVIs to give a sense of the roads true visibility.
- There is no highway barrier fencing or restraint barriers or pedestrian barriers in the views.
- All the views are with trees largely in leaf and none give an impression of winter views.

Specific comments

Fig 2 Viewpoint 4 – The new housing appears significantly more prominent in the year 1 view compared to the previous submitted VVI.

Fig 5 - As mentioned in my main note above this 10 year post planting view illustrates screening of the escarpment.

Fig 14 – Viewpoint 7 – This confirms the prominence of the road in views towards the pavilion. It will simply not be possible to keep the existing hedgerow up to the lip of the cutting due to construction requirements.

Figs 14 & 15 – Different rate of tree growth between those 'framing' the pavilion and those screening houses to left.

Figs 14 & 15 - The road junction appears flat in these VVI's compared to the same junction in Fig 9 that is more sloped.

Fig.17 View point 8. Looking east from the open area at the southern end of the site. Confirms the prominence of the new housing in views towards the Pavilion at Year 1 and the major changes to landform resulting from the new cutting.

Fig.19 View point 9. Looking east from the open area at the south-west end of the site, close to the southern boundary. Confirms the prominence of the embankment at the site entrance. The engineering works to create this embankment will have a major destructive impact on ridge and furrow, as noted in my Proof of Evidence.

Fig 24 – Access road embankment is visible as is the steep footpath running up to it with these side footpaths requiring side slopes that are not shown. Nor is there any barrier or fencing shown at the embankment edge. A house on Harp Hill has also appeared, has this been accurately modelled or 'eyed-in' as it cannot be seen on the original photograph.

Figs 29 & 30 – There is a complete lack of vehicles or pedestrians in these views which would aid the appreciation of the roads true appearance in the landscape.

The LPA accepts the alternative masterplan subject to it being illustrative, that the content confirms, in the LPAs view, the previously stated landscape and heritage concerns and Gloucestershire County Council's comments have primacy in respect of road layouts and gradients.