

24 June 2020
West of Park Farm - 18.6450.doc



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Dear Ms Loveday

**Land West of Park Farm (Planning Application Ref. 18/6450/O):
Response to Conservation Officer Comments**

At our meeting on 27th May, we agreed to provide a response and clarification on points raised in the comments made on the application by the Conservation Officer (dated 24th March 2020).

Overall Conclusion

It is helpful to start with the overall conclusion; where it is agreed between the parties that any harm (if any is identified), would be no more than *less than substantial harm*; with the Conservation Officer confirming that from their perspective, that the harm would be *limited* and *at the lower end of the spectrum*.

In considering the application, in accordance with the Conservation Officer's conclusions of harm, it is necessary to consider the relevant national legislation and the NPPF. In making the planning decision, the heritage harm identified by the Conservation Officer must be weighed against the public benefits of the scheme as a whole (paragraph 196). Whilst this is the relevant test, the courts have held that "*the fact that the harm may be limited or negligible* [in other words, at the lower end of the spectrum of less than substantial harm] *will plainly go to the weight to be given to it as recognised in Paragraph 193 NPPF*".

In addition to the test set within the NPPF, there is a duty on the decision maker to consider their duties as set out in Sections 66 and 72 of the Listed Building Act 1990.

The Conservation Officer noted a number of measures that would minimise or mitigate any harm and we set out below how these have been considered and incorporated into the scheme design.

Views towards St Mary's Church Tower from Oldbury Lane

The topography and intervening vegetation limits the role that St Mary's Church tower plays in public views from Oldbury Lane. The existing vegetation along Oldbury Lane is now at least 2-3m high and therefore now precludes views into, and across, the site to St Mary's Church tower for the majority of its length; with the existing hedgerows higher than the height of a car or person.

In the few locations where there remain brief glimpsed views, in practice there would be no real appreciation of the church tower from along this road. There are no public footpaths along the road (and none are proposed) and drivers would have only an oblique and distant view of the church whilst moving at speed. This view would also be at the level of a driver in a car and not the standard height measurement from an LVIA.



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The lack of existing views was recently confirmed in the Urban Design Officer's response (dated 26th May 2020) following a site visit, and agreed in a subsequent meeting with the Landscape and Planning Officers (date 27th May 2020).

As agreed with Officers at that meeting, it is proposed that hedgerows along most of the northern boundary of the site will be maintained at c. 2-3m in height. This has been included as an additional design principle in the DAS and will be secured by planning condition(s) and delivered as part of the future Landscape and Ecological Management Plan for the site.

Securing Meaningful Vistas towards St Mary's Church Tower

The creation of a number of 'view corridors' to St Mary's Church tower within the site has been considered as part of the design process.

Views of the church tower from the open space within the west and south of the site will remain— varying from more direct views to glimpsed views through vegetation.

The opportunity of retaining a number of glimpsed views ('glimpsed' as they are not continuous due to topography and vegetation) between the site and the church tower is identified as a key design characteristic, and part of the placemaking strategy. The DAS (January 2020) confirms this under the consideration of 'Community' within the Design Rationale (p68) – one of three overarching design principles for the site. This recognises the role that glimpsed views will play in aiding the design legibility and helping to create a sense of place. The associated map identifies three view alignments through the built form. This design principle is affirmed in the DAS (p82/83); which confirms that these are integral to the design concept, and identifies these view corridors on the associated Illustrative Masterplan. The importance of these views is reiterated again at p90 of the DAS.

Following discussions with SGC's Urban Design, Landscape and Planning Officers, it was agreed that the western view would become a 'Priority Vista' to St Mary's Church tower. An update to the DAS confirms this Priority Vista, and sets out bespoke design principles to ensure that it is delivered at the detailed design stage including in relation to road alignment, verge widths, property set-back and green infrastructure in order to ensure that any built form serves to frame the vista.

It has also been agreed that at the reserved matters (detailed design) stage, the design of this vista will be supported by a further study, which could include a cross-section, to ensure that those design principles are delivered.

It has also been agreed that a planning condition can appropriately emphasise the importance of both the Priority Vista and the two 'glimpsed' views, and require that reserved matter applications are accompanied by a detailed study demonstrating that these view corridors are retained within the final detailed design for the scheme. Thus, the design principles and the delivery of meaningful vistas can be secured at this outline planning application stage.

Other Heritage Assets

The submitted Environmental Statement (Chapter 7) considers the views from/to the other heritage assets, including the wider Castle group, Thornbury Conservation Area and Shieling School. The assessment was based upon site visits, and informed by the LVIA, in particular viewpoints 7 and 9 (and associated Photomontage for VP9). The ES concludes that by virtue of distance, topography, and intervening vegetation providing screening, the effects of development on these assets would be 'neutral'.

The ES confirms that the management of existing, and delivery of new ('thickening', 7.5.3 of ES (January 2020)), planting within the site has a role in continuing to provide screening to these assets, as confirmed in the Conservation Officer's response, and this is reflected in the DAS (Part 4.5, p40).

It appears that the Conservation Officer's comments are seeking clarification on the above referenced paragraph of the DAS, which states, "...to minimise visual impact, it would be appropriate in this context to consider mitigation planting of screening belts as part of the development design, allowing for retained glimpsed views in places".

As explained in Section 4.2 (Landscape) (p34/35 DAS), the existing mature woodland and hedgerows on the southern boundaries of the site, together with the woodland blocks and tree lines within the southern parts of the site, already provides screening which limits inter-visibility between the heritage assets and the areas within the site where built development is proposed. The mitigation identified in Section 4 of the DAS will comprise long-term protection and management of the retained hedgerows and trees/woodland, as identified on the Green Infrastructure Parameter Plan with reinforcement of those features, where appropriate with additional planting.

To provide further clarification we attach a revised Illustrative Landscape Masterplan, which provides additional detail in this regard.

An appropriately worded planning conditions will require the submission of Landscape and Ecological Management Plan(s) and Construction Management Plan(s), which will require the detailed measures for this to be submitted to and agreed by SGC prior to the start of construction on each phase of development.

As the Conservation Officer notes, this screening will continue to limit the inter-visibility between the Thornbury Castle group and Sheiling school.

Cumulative

The Environmental Statement, Chapter 7 (as revised January 2020), considers the cumulative impact of development proposals on the identified heritage assets, and the consideration of the heritage assets as a 'group'. The conclusion remains that the impact on the assets, either individually or cumulatively, is 'neutral'.

Landscape Management

There are a range of landscaping principles for the site, including the management of the hedgerow along Oldbury Lane, the management of vegetation to retain the identified views to the Church tower, and as part of the screen planting in regard to other heritage assets.

As discussed at the recent Officer meeting, a Landscape and Ecological Management Plan can be secured by planning condition, which will be required to be in accordance with the principles set out in the DAS, the submitted plans and the measures set out in the Environmental Statement. Thus the delivery of these design principles is secured at this outline planning application stage.

Design Comments

Western Edge

The DAS update includes a design response to the north-western corner of the site following discussions with the Urban Design, Landscape and Planning Officers. This sets out a combined design and landscape response to aid the transition from rural to urban. The western edge of the site is substantially planted, and there are no views across to the church tower from this location on Oldbury Lane.

Building Heights

The application is submitted in outline, and therefore the building heights are secured as an upper parameter. They represent maximum heights and whilst an allowance for 'earthwork tolerance' is included, no substantial earthworks are anticipated across the vast majority of the site.

We note that the Conservation Officer's updated response does not appear to reflect that revised Scale Parameter Plan (January 2020) which reduce the building heights across the site in response to the comments raised.

The '10.5m' 2-storey house is, as set out on the Scale Parameter Plan, a 7.5 to 9.5m 2-storey house, with the additional 1m of earthworks tolerance. As set out above, no substantial earthworks are anticipated on this site. The Parameter Plans set the maximum heights, the appropriateness of individual building heights (below these parameters) will be considered at the detailed design stage. Thus, SGC will need to approve the final height of any proposed dwellings, informed by the detailed earthworks strategy.

Whilst 3 storey buildings are included on the parameter plan, this is not anticipated to go beyond a small number of key buildings that would be used centrally to aid with legibility of place. No 3 storey buildings are proposed in the southern, western or northern parts of the site. It is also explicitly referenced on the Scale Parameter Plan that the location of these units will *"require agreement with SGC at the detailed design stage"*. Clearly this agreement in terms of the location and design of these buildings would be based upon an assessment informed by the detailed earthworks strategy for the site, and would therefore assess the precise height of the proposed buildings.

For the purposes of the outline planning permission, it is considered that the building heights strategy is appropriate.

Green Frontage Character Area

We have considered the comments made in regard to the design detail of the Green Frontage character area.

In response, we have added an additional design principle within the updated DAS for this character area: *'Coherent appearance will be formed by well-coordinated and consistent application of materials along each of the frontages.'* It also includes a series of specific design principles that can be secured by condition to ensure that this vision is achieved, including to propose a limited and 'traditional' palette of materials.

It is considered that this additional design principle provides a sufficient basis upon which the detailed design proposals can be considered in light of the detailed design points set out in the Conservation Officer's response.

In regard to building heights, these are secured through the Scale Parameter Plan, and this confirms that buildings along the southern edge of the development would be restricted to 2-storeys. The Green Frontage character area covers a range of locations across the site, including areas with the centre of the site. Whilst the majority of the Green Frontage character area is therefore restricted to 2 storey, and thus the reference to 'mainly' within the DAS, there are locations within this character area where buildings may be above, or below, this storey-height – in accordance with the maximum building heights identified on the Scale Parameter Plan. This is restricted to 2.5 storey heights in this locations, and as set out in the Scale Parameter Plan, in practice these units are only 0.5-1m higher than the 2-storey units.

The character area is clearly identified as 'organic, semi-regular'; semi-detached and detached properties; informal appearance; sensitive transition; and with front gardens and sensitive boundaries; which will all inform the materials, orientation and detailed layout. There will clearly be some distinction across the character area responding to the individual locations being considered, varying from the Green Frontage on Oldbury Lane, that fronting the central green space, and that fronting the open space to the south. It is considered that for an outline planning application, the overall Green Frontage Character Area, with the inclusion of the additional design principle referenced above, provides an appropriate basis upon which detailed designs can come forward which respond appropriately to the location of this character area on the edge of the proposed development.

Cross Section

We note the request for a cross-section through the site from Oldbury Lane to the heritage assets to illustrate the difference in building heights. The distance between the heritage assets and built form would mean that a cross-section showing the difference in height between a 2, 2.5 or 3 storey dwelling would show no discernible difference in building heights on a cross-section at this scale.



As set out above, building heights are set at a maximum parameter, and there are sufficient planning controls available at the reserved matter stage to consider the appropriate height of individual buildings informed by the detailed design and earthworks strategy.

Conclusion

The heritage harm has been assessed by the Conservation Officer as being 'less than substantial' – and further that this is 'towards the lower end of the spectrum'.

In response to comments made previously, the January 2020 revision to the planning application included revised building heights (Scale Parameter Plan), and additional design information within the DAS.

A combination of heritage, landscape and placemaking considerations has resulted in an additional design response being submitted, alongside confirmation in regard to how planning conditions can appropriately secure a number of the principles which will inform the detailed design.

The DAS Update establishes the design principles for the three agreed vistas, including the western 'Priority Vista' and the design principles for the Green Frontage Character Area. As set out above, planning conditions can appropriately secure the detail in regard to landscape management (including new planting to enhance existing screening vegetation and management of existing and new landscape measures including the hedgerow along Oldbury Lane), and final building heights informed by the detailed design and earthworks strategy.

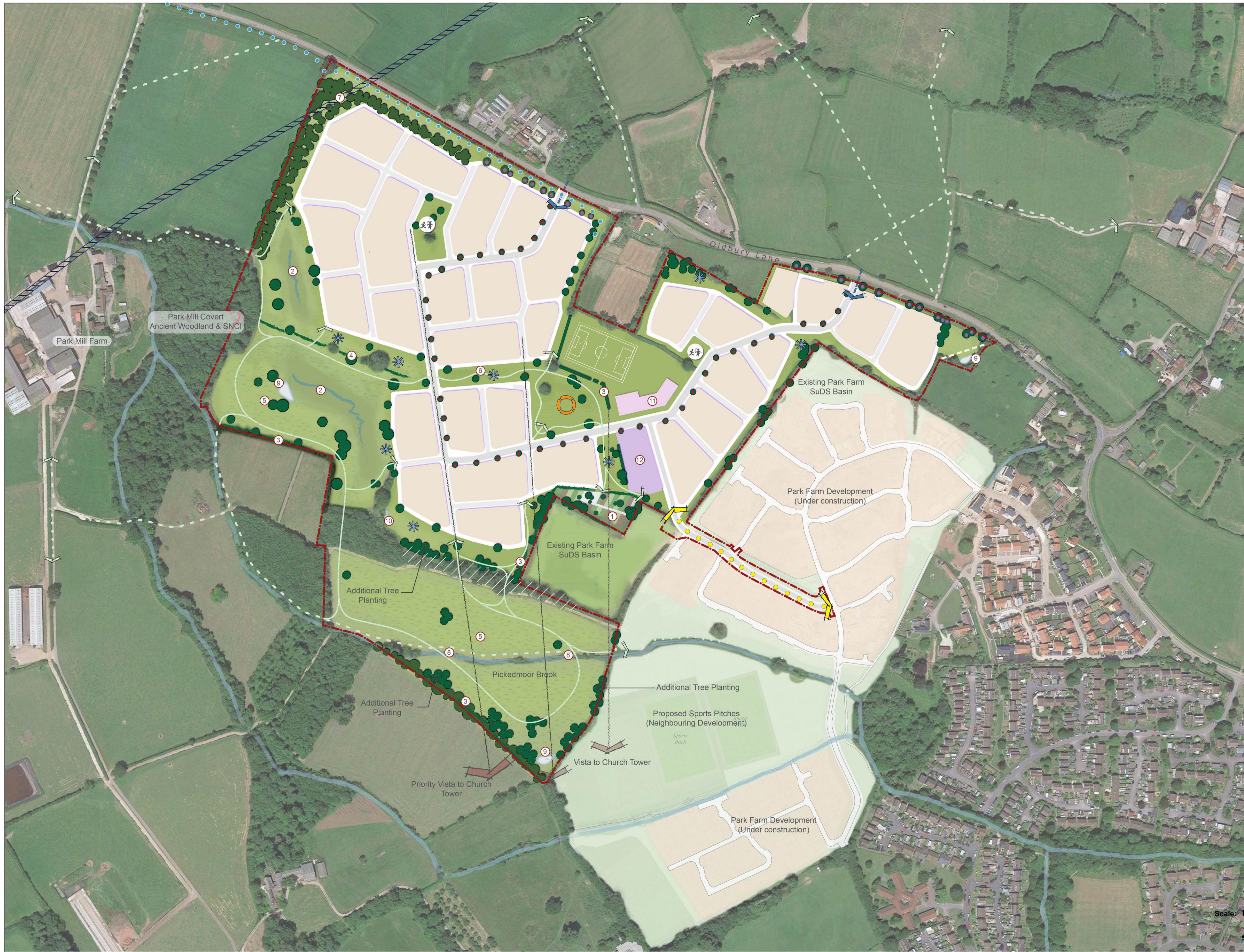
Adopted Policies CS9 and PSP17 require heritage assets to be 'conserved, respected, and enhanced' in a manner appropriate to their significance, and it is considered that the application meets this policy requirement. The design responses, both within the original submission, January 2020 revision and the most recent DAS update appropriately minimise and mitigate against heritage harm; with this at the lower end of less than substantial as assessed by the Conservation Officer. This heritage harm is therefore to be considered under paragraph 196, and within the planning balance.

Yours sincerely

F Tozer

Felicity Tozer MRTPI
Associate Planner

Enc: Illustrative Landscape Masterplan Rev F



Legend

- Site
- Proposed pedestrian linkages
- Proposed vehicle entrances
- Proposed sustainable transport connection to Park Farm
- Existing trees and hedgerows (priority habitat)
- Existing water course (priority habitat)
- Existing standing water / pond (priority habitat)
- Proposed informal meadow grassland
- Proposed wet grassland (SuDS depression)
- Proposed Wessex Water Foul Drainage

Proposed Tree/Hedgerow Planting:

- Native woodland structure planting (mixed species sizes)
- Parkland /open space planting (mixed species sizes)
- Translocated hedgerow
- Street trees (large species)
- Trees along road frontage (large species)
- Destination Park
- Neighbourhood Greens
- Natural Play
- Existing belt of trees to be managed to thicken up with interplanting of holly understorey and climatic climax ANS tree species. Where vistas are proposed the lower canopy of the taller trees would be thinned/cleared so as to provide sightline 'windows' through the tree belt towards the church tower.

- 1 Proposed allotments
- 2 Proposed SuDS surface water attenuation areas: (It is envisaged that these would be dry depressions that would periodically fill with water for short periods of time during storm events)
- 3 Proposed translocated hedgerow
- 4 Location of existing hedgerow linking to woodland
- 5 Proposed parkland/informal POS
- 6 Proposed green corridor
- 7 Easement for existing oil pipeline
- 8 Existing watercourse & proposed crossing points
- 9 Proposed indicative wildlife pond location
- 10 Existing pond (priority habitat)
- 11 School (1FE)
- 12 Indicative location of Retail/Community Hub

NOTE: This drawing should be read in conjunction with the Green Infrastructure Context Plan 16-10-PL-202 which shows the green infrastructure assets and links surrounding the site.

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Project:
 Land West of Park Farm,
 Thornbury

Title:
 Illustrative Landscape Masterplan

Revisions
 Rev F: Areas of additional planting added - 23/06/2020
 Rev E: Hedgerows amended - 20/12/2019
 Rev D: Updated masterplan - 15/11/2019
 Rev C: Title and GI context amended- 05/11/2018
 Rev B: Minor graphical amendment - 21/09/2018
 Rev A: Minor legend amendments - 14/09/2018
 Rev 0: Drawing created - 31/08/2018

Drawn by: JG
Checked by: PJR
Status: Planning
Date: 31/08/2018
Drawing no: 16-10-PL-201
Rev: F

Scale: NTS