

Land to the West of Park Farm, Oldbury Lane, Thornbury

Appeal on behalf of Barwood Development Securities and The North-West Thornbury Land Consortium

Landscape Statement

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Application Ref: PT/18/6450/O

Appeal/PINS Ref: APP/PO119/W/21/3288019

February 2022

The Richards Partnership Reference 16-10-R02

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ABBREVIATIONS

LVIA	Landscape and Visual Impact Assessment
LLCA	Local Landscape Character Areas
CGI	Computer Generated Image
ES	Environmental Statement
DAS	Design and Access Statement [CD7.1]
ZTV	Zone of Theoretical Visibility
FFL	Finished Floor Level
SGC	South Gloucestershire Council
NDP	Neighbourhood Development Plan
TNDP	Thornbury Neighbourhood Development Plan [CD1.9]

1 PERSONAL DETAILS

- 1.1 My name is Peter John Richards. I am a Chartered Landscape Architect and Urban Designer; I hold a Bachelor of Arts Honours Degree in Landscape Design and a Postgraduate Diploma in Landscape Architecture from the Manchester Polytechnic and a Postgraduate Diploma in Urban Design from Cardiff University.
- 1.2 I have practiced as a Landscape Architect for over thirty years, and have held senior posts in leading landscape and environmental consultancies. I jointly founded the Richards Partnership in 2005. Over the last thirty years, I have completed numerous Landscape and Visual Impact Assessments for local government and for the private sector and have been involved in the site planning and landscape design of many commercial, residential and recreational schemes both in the UK and overseas. The quality and public benefit of these schemes have been recognised in Civic Trust and Landscape Institute's awards, the restoration of Canada's oldest burial ground into a public park being awarded the Landscape Institute's prestigious biennial Design Award.
- 1.3 I am familiar with the Guidelines for Landscape and Visual Impact Assessment – Third Edition published by the Landscape Institute and Institute of Environmental Management and Assessment (GLVIA3).
- 1.4 Lastly, I confirm that this Landscape Statement is true and has been prepared and is given in accordance with the Landscape Institute Code of Conduct. I confirm that the opinions expressed are my true and professional opinions.

2 INTRODUCTION

- 2.1 The Richards Partnership was appointed in April 2016 to advise on landscape and visual issues with regards to a potential residential development on land west of Park Farm, south of Oldbury Lane, Thornbury (the site). Our instruction was to provide the client and their team with advice on how the site and the proposed development might interrelate with the adjoining town and countryside.
- 2.2 Our landscape advice was incorporated into the scheme submitted in the outline planning application and the Design and Access Statement (DAS) [CD7.1] which supported it. These were accompanied by a Landscape Chapter [ESD J13.13] within an Environmental Statement (ES). This Landscape Chapter and the DAS were subsequently updated/revised to accommodate changes agreed with South Gloucestershire Council (SGC) officers made in post application submissions, meetings and correspondence.
- 2.3 The appeal is against the non-determination of the outline planning application submitted to SGC on Tuesday 18th December 2018.
- 2.4 In Section 3 of my Landscape Statement I will outline the consultations, meetings, changes to the proposals and additional material submitted to SGC which led to the landscape officer, Jane Jarvis, confirming the landscape proposals within the DAS *“are all acceptable”* and that the changes to the landscape scheme/masterplan *“addressed previous landscape concerns.”*
- 2.5 In Section 4 I will consider how the proposal accords with the landscape and visual aspects of the emerging Thornbury Neighbourhood Development Plan (Jan 2022) [CD1.9].
- 2.6 In Section 5 I will provide a resume of third party representations in relation to landscape and visual matters and consider how these have been addressed within the proposals.
- 2.7 In Section 6 I will provide my Summary.

3 A SUMMARY OF LANDSCAPE CONSULTATIONS THE RICHARDS PARTNERSHIP HAD WITH SOUTH GLOUCESTERSHIRE COUNCIL IN THE PREPARATION OF THE PLANNING APPLICATION.

3.1 In this section of my Landscape Statement I have outlined the consultations undertaken with SGC, the landscape and visual issues discussed, the changes made to the proposals and the landscape and visual information submitted. It should be noted that the initial consultation response received from SGC's landscape officer, Angela Bence-Wilkins, in March 2019 was generally supportive. As will be discussed in a little more detail later in this section, the officer raised some concerns and requests for additional information but, most importantly, Ms Bence-Wilkins noted in her consultation response, that she considered the LVIA to be:

“thorough and comprehensive”. (see Appendix A)

Over the following 18 months the Barwood project team continued to meet with SGC officers and submitted additional work to address officers' concerns. During this period SGC brought in Jane Jarvis, from SLR Consulting, to advise on landscape matters. Jane Jarvis subsequently became an officer at the council. The meetings and additional information submitted at the meeting led to Ms Jarvis' consultation response in September 2020 (Appendix B), in which she notes:

“Following the design consultation meeting held with the applicants/consultants, the landscape related text and diagram amendments to the DAS are all acceptable”

In the same consultation response Ms Jarvis goes on to note that, bar additional requested mitigation changes, she has

“agreed enhancements to proposals address previous landscape concerns.”

3.2 For completeness and ease of reference I have provided a Table below in which I have summarised the Landscape and Visual Effects recorded within the ES Landscape Chapter. The LVIA drawings identifying the County and Local Landscape Character Areas and Viewpoint Locations are provided as PJR-1, PJR-2 and PJR-3.

Table1: Summary of ES Landscape Chapter Landscape & Visual Effects			
Predicted Effects	Construction Effects	Year 1 Effects	Year 15 Effects
Gloucestershire Landscape Character Assessment (PJR-1)			
Area 18: Severn Ridge	Negligible	Negligible	Negligible
Local Landscape Character Areas (LLCA) (PJR-2)			
LLCA - 1	Substantial adverse	Substantial adverse	Substantial adverse
LLCA - 2	Moderate adverse	Minor adverse	Minor adverse
LLCA - 3	Negligible	Negligible	Negligible
LLCA - 4	Minor adverse	Minor adverse	Minor adverse
LLCA - 5	Minor adverse	Minor adverse	Minor adverse
LLCA - 6	Negligible	Negligible	Negligible
Representative Visual Receptors (PJR-3)			
Viewpoint Group A	Moderate adverse	Moderate adverse	Minor adverse
Viewpoint Group B	Minor adverse	Minor adverse	Minor adverse
Viewpoint Group C	Moderate adverse	Moderate adverse	Moderate adverse
Viewpoint Group D	Moderate adverse	Moderate adverse	Moderate adverse
Viewpoint Group E	Minor adverse	Minor adverse	Negligible
Viewpoint Group F	Negligible	Negligible	Negligible
Viewpoint Group G	Minor adverse	Minor adverse	Minor adverse
Viewpoint Group H	Minor adverse	Minor adverse	Minor adverse
Viewpoint Group I	Substantial adverse	Substantial adverse	Moderate adverse
Viewpoint Group J	Negligible	Negligible	Negligible

3.3 The landscape meetings and SGC consultation response are listed below:

February 2019: LVIA proposed viewpoints submitted to SGC, Landscape Officer, Angela Bence-Wilkins

March 2019: SGC provided landscape officer, Angela Bence-Wilkins initial landscape comments. (Appendix A)

25th June 2019: Landscape consultation response provided by SGC external landscape consultant, Jane Jarvis of SLR consulting, at a meeting with SGC on 25th June 2019 (Appendix C)

21st August 2019: Landscape and Urban Design meeting attended by Barwood team and SGC officers (as a follow up to 25th

June meetings (Minutes attached as Appendix D)

27th May 2020: Landscape, Urban Design and Heritage virtual meeting with SGC's officers. Minutes prepared by Nick Matthews of Savills attached as Appendix E. Nick Matthews of Savills letter to Catherine Loveday (SGC) dated 24th June 2020 responding to conservation officer comments raised at meeting on the 27th May 2020. Letter provided as Appendix F.

3.4 Below I have provided a breakdown of the main landscape issues discussed at these meetings and the Barwood team responses.

Landscape matter raised: The ES Landscape Chapter assessment has not considered cumulative sites (raised by Jane Jarvis in landscape comments provided at our meeting with officers on the 25th June 2019 – See Appendix C).

3.5 The project planning consultants, Savills, liaised with South Gloucestershire officers on this matter and six sites were considered within the Landscape Chapter Section 13.9: Cumulative Sites.

Landscape matter raised: The Zone of Theoretical Visibility Analysis issued with the LVIA methodology did not reflect built form extents and heights proposed.

3.6 The Richards Partnership drawing 16-10-IN-112 entitled "Zone of Theoretical Visibility" (see PJR-5) was issued to the Council in early January 2018 in support of the visual analysis work being undertaken to identify viewpoints to be considered within the LVIA. Being at the early stages of the design development the drawing legend notes, "*Assumed development would be 10.5m high (3 stories) based upon a grid of 8 No. targets*".

To address SGC's concern this drawing was reviewed and drawing no. 16-10-PL-203 Rev A (PJR-6) was issued to the council in August 2019. This drawing/assessment shows the variations between the earlier drawing, which was based upon 10.5m high buildings and the submitted application parameter plans, which included a range of building heights of 11m to 14m.

3.7 The ZTV analysis drawing 16-10-PL-203 Rev A (PJR-6) was left with Jane Jarvis at the meeting held at the council offices on 21st August 2019, with the request officers contact the team should they have any remaining issues with this work. As the project team received no further correspondence or telephone communications from the council on this matter, it was assumed the council were satisfied with this information and it had addressed their concerns.

3.8 For ease of reference the final ZTV study which is provided within the ES Landscape Chapter as Figure 13.12 is provided as PJR-7.

Landscape matter raised: SGC Landscape Officers (both Angela Bence-Wilkins and Jane Jarvis) raised concerns that the SuDS basins should not be an ‘engineering led’ design which, as experienced on the adjoining Park Farm development, let to a fenced off, unfriendly basin that offered little or no informal recreational potential.

3.9 In collaboration with the project drainage engineers (Stantec), The Richards Partnership prepared the “Landscape Sketch Scheme for the SuDS” (drawing 16-10-SK11 A) which provided the flood storage volumes required by the engineers, which comprised a 1.1m deep depression with side slopes ranging between 1 in 4 and 1 in 12 providing a landscape led and attractive solution. This drawing was welcomed by the landscape officers who advised that this addressed SGC’s concerns. This drawing was placed in the DAS [CD7.1], Para 10.4 Drainage, Page 128. For ease of reference it is provided in PJR-8.

Landscape matter raised: Landscape officer, Jane Jarvis, noted that she did not believe the current layout takes advantage of the opportunity to create a positive viewpoint corridor/vista towards St Mary’s Church. This concern related to views from the proposed development site, from Oldbury Lane and from the public footpath (OTH/60) to the north of the site (Viewpoint 12 in the LVIA)

3.10 With regards views looking south from the public footpath OTH/60 (see PJR-9: Public Rights of Way plan) situated to the north of the site, it was shown at the meeting with SGC’s officers on 21st August 2019 that the Park Farm housing development (which was still under construction at the time)

sat in the foreground of the sightline to the church and so the creation of an undeveloped view was not possible. Jane Jarvis requested a photomontage be produced for Viewpoint 12. I noted at the meeting that, as this had not been requested previously and that given Viewpoint 12 clearly shows the Park Farm development under construction, this work was not considered necessary.

3.11 With regard to views from Oldbury Lane, The Richards Partnership returned to site in July 2019 and undertook a review of views to the St Mary's Church tower from Oldbury Lane and we also reviewed the winter 2018 photographs we had of the site. In addition, we also walked the network of public footpaths to north of the site to identify locations and the quality of views from these footpaths to the St. Mary's Church. This site work enabled us to prepare drawings 16-10-SK-14 (PJR-10) and 16-10-IN-15 (PJR-11) which were tabled and discussed at a meeting with Catherine Loveday and Jane Jarvis on 21st August 2019. It was agreed in this meeting and the subsequent Savills' meeting minutes (Appendix D) that this was helpful additional analysis and the studies demonstrated that views of the church tower are limited from both Oldbury Lane and the public footpath to the north. It was also noted by myself and Nick Matthews (Savills) that in the absence of a footpath along Oldbury Lane, the visual receptors would be most likely to be limited to motorists and cyclists, both of which would be travelling with their attention on the view in front of them, at speed and, as the available views to the church are oblique, the available viewpoint opportunity would be very limited.

3.12 With regards views to the St. Mary's Church's tower from within the site, it was noted, and I believe accepted by all, that views to the church tower are strongly influenced by the location of the viewpoint within the site and the time of year the view is experienced. Views from the parts of the western and north-western side of the site are precluded year round by a combination of intervening woodland, trees and hedgerows running east west across the site and the belt of trees/woodland areas running along the western edges of the site. Similarly, views from more open, eastern parts of the site vary according to the time of year and the relative proximity to

hedgerows. During consultation with SGC's officers the Barwood team investigated:

- Improving the sightline/viewing corridor already identified within the DAS from the western part of the site /scheme
- Providing a rationale/justification for the design response to the church, explaining what can be seen from where and how it has informed the masterplan.

3.13 At our virtual meeting with SGC's on 27th May 2020 the Urban Design and Landscape Officers, Matt Haslan and Jane Jarvis, it was agreed that the viewing opportunities to the St. Mary's Church from Oldbury Lane and the footpaths to the north were limited and the Barwood design team should focus on crafting vistas/promoting vistas within the proposed layout (Appendix F: Savills' letter 24th June 2020 noting matters discussed at the virtual meeting on 27th May 2020).

Landscape matter raised: The landscape officer (Jane Jarvis) raised concerns regarding the boundaries of the Local Landscape Character Areas 1 and 5. LLCA 1 – Edge of Settlement Floodplain Pasture and LLCA5 - Park Mill to Thornbury Castle

3.14 This matter was raised during the meeting with Catherine Loveday and Jane Jarvis at our meeting on 25th June 2019. At this meeting Jane Jarvis queried the inclusion of the southern and north-western most fields as part of LLCA 1 – Edge of Settlement and Floodplain (see PJR-2). I and a colleague returned to site in early July to review our work and in light of Ms Jarvis' queries and our Landscape Chapter text relating to these character areas was amended. The boundaries of the local landscape character areas remained as originally shown.

Landscape matter raised: The retention of the rural approach into Thornbury along Oldbury Lane by consideration of an appropriate development edge set back from the lane, and more transitional form and diversity.

3.15 The original planning application masterplan proposed the existing western woodland edge provided largely by Parkmill Covert be extended northwards

to Oldbury Lane and then wrap around and follow the Oldbury Lane eastwards to the proposed vehicular site entrance opposite Oak Farm. I believe it would be fair to note officers were generally in agreement with the 20-30m wide belt of planting along the site's western edge, but the 'joined up' thinking of the landscape and urban design officers sought a 'looser' more 'transitional' green frontage from the site's north-western boundary, east to the vehicular entrance proposed opposite Oak Farm (terms taken from the comments made by SGC officers at our meeting on the 27th May 2020 (see minutes provided as Appendix E and Nick Matthews follow up letter dated 24th June 2020 which is provided as Appendix F).

- 3.16 The agreed solution for this north-western edge was agreed with the urban design officers through a number of landscape and urban design studies. The final iteration is provided in the DAS, pages 94-97. For ease of reference the above DAS pages are reproduced as PJR-12a & 12b.

Summary of consultations undertaken between June 2019 and May 2020

- 3.17 As noted earlier the consultations and additional design material submitted and discussed with SGC officers led to the landscape officer, Jane Jarvis, noting in her consultation response of 25th September 2020 (Appendix B) that,

“Following the design consultation meeting held with the applicants/consultants, the landscape related test and diagram amendments to the DAS are all acceptable.”

and that the agreed amendments addressed the primary landscape concerns.

4 HOW THE PROPOSALS ACCORD WITH THE EMERGING THORNBURY NEIGHBOURHOOD DEVELOPMENT PLAN

4.1 I understand that it is possible that the Thornbury Neighbourhood Development Plan (TNDP) (January 2022) [CD1.9] will be ‘made’ ahead of the opening of the Public Inquiry on 29th March 2022 and therefore I have provided my landscape consideration of the following Vision and Policies contained within the TNDP, which I consider to be relevant to landscape.

Vision and Objectives (also including pages 13-14)

- **Our Vision** (page 14)
- **Policy 1: Rural Character and Landscape Setting** (page 17 and supporting text on page 16)
- **Policy 17: Planning for Green Infrastructure, Biodiversity and Food Production** (page 41)
- **Policy 18: Streamside Walks** (page 43)

Vision, Objectives and Policy 1: Rural Character and Landscape Setting

4.2 The TNDP undertook a range of workshops, meetings and public consultations to distil the community’s thoughts on the issues and feelings as to what matters to them. These views and feelings were “*translated into a vision and as a set of objectives. Our visions is:*

“Thornbury will retain its market town and historic character and its sense of community. It will keep and expand its green spaces, streamside walks, connections with nature and access to the countryside. It will be resilient to climate change and provide well planned, high quality, sustainable and affordable houses.”

(Our Vision, page 14 of the TNDP, January 2022)

4.3 From this vision the community identified a set of ‘Objectives’ to bring their ‘Vision’ to reality. In the Vision’s supporting notes the TNDP states that:

“A set of objectives has been developed to bring our vision to reality. Thornbury will:

- *Preserve its unique character and historic identity and rural separation through well planned holistic high-quality placemaking and design”*

4.4 This vision and objective is carried over into **Policy 1: Rural Character and Landscape Setting**

“The rural character and the landscape setting of Thornbury Parish should be protected. Development proposals should demonstrate how they will:

- *Protect, enhance or create easy access routes from Thornbury Town into the countryside for walking, cycling and riding (See Figure 8. Green Infrastructure within Thornbury)*
- *Protect key views and vistas as shown in Appendix C.*
- *Be sensitive to and reflect the character and identity of nearby and adjacent villages and hamlets and avoiding visual coalescence.*
- *Protect the rural character of Thornbury’s local environs, taking into account Thornbury’s location in the bowl of the Severn Vale (see Figure 6. Severn Ridges Plan)”*.

4.5 I will consider each of these bullet points in turn.

Development proposals should demonstrate how they will: protect, enhance or create easy access routes from Thornbury Town into the countryside for walking, cycling and riding (see Figure 8. Green Infrastructure within Thornbury)

4.6 As shown in the application Illustrative Masterplan (Figure 13.29 reproduced as PJR-13) the Existing Site Conditions plan, (Figure 13.1, see PJR-14) and Public Rights of Way plan (PJR-9), the site and the countryside around it enjoy a network of public rights of way. The proposed scheme would, via the proposed vehicular and two existing public rights of way along the site’s eastern boundary with the Park Farm residential area, provide links for pedestrians and cyclists into the proposed development. Once within the development, the Illustrative Landscape Masterplan (see PJR-13) shows how the development could provide a number of internal circuitous routes

through the site's green spaces and how these paths would provide connections to existing public rights of way situated along or adjacent to the site's southern, western and northern boundaries. Given this, I believe it is clear that the development proposals would enhance public access into the countryside and therefore the proposals would be in accordance with this part of the TNDP Vision and Objectives and Policy 1.

Development proposals should demonstrate how they will: protect key views and vistas as shown in Appendix C (provided in my Landscape Statement as Appendix G)

4.7 The supporting text to this policy states:

"5.4.2 Setting, Views and Panoramas

Thornbury, as a market town in a rural setting, benefits from visual links to the surrounding countryside and gains some of its individuality from these views including expansive vistas over the Severn Vale and the escarpment. Preserving these countryside and architectural views, including towards Thornbury Castle and the 12th century St Mary's church, will help to maintain the essential character of its market town ethos and history. The views and panoramas also contribute to the distinctive identity of the area in terms of ecological, amenity, recreational and agricultural value. It is important that key views of the town from the surrounding countryside are not impeded by future development, thereby maintaining its traditional setting in the Severn Vale landscape. A list of key views and panoramas can be found at Appendix C."

4.8 For ease of reference these 'Key Views' as provided in the TNDP (Appendix C) are reproduced and provided as Appendix G to this Landscape Statement.

4.9 In the preparation of this Landscape Statement I have visited these Key View locations and I have provided panoramic photographs taken from them as Appendix H to this Landscape Statement. It is clear that from those viewpoints/locations within and in close proximity to the town that, as a result of intervening built form, vegetation and topography the site and the

proposed development would not be visible. This is thought to be the case from 'Key Views' 1, 2, 3 and 7. Key Views 4, 5, 6, 8 and 9 are located on elevated ground around Thornbury. These views are located some 2-3kms from the site which as a result of distance, along with intervening trees and built form, plays a small role in wider panoramas. Whilst it is possible, that the development roofscape may be partially visible from the elevated viewpoints (such as those along the A38 – views 5 & 6) I believe it is clear in the photographs I have provided, that this change would not be prominent or incongruous. Most importantly the introduction of the development would not block or detract from the elevated views out across the Severn Vale to the Severn Estuary and the Forest of Dean beyond.

4.10 In consideration of the above, I believe it is clear that the application would not be in conflict with this element of the TNDP Objectives, Vision and Policy 1.

Development proposals should demonstrate how they will: be sensitive to and reflect the character and identity of nearby and adjacent villages and hamlets and avoiding visual coalescence.

4.11 The nearby villages and hamlets to the site are shown on PJR-15. As shown, the nearest villages to the site are Oldbury-on-Severn and Oldbury Naite, approximately 1.5kms and 2kms to the west respectively. The nearest hamlets are Lower Morton and Duckhole, approximately 0.8km and 1.2kms to the north of the site and North Kington and South Kington approximately 1.5kms to the south west. These villages and hamlets were visited in the preparation of the ES Landscape Chapter and as a result of the area's relatively flat to gently undulating nature, coupled with the many intervening woodlands, hedgerows and buildings, no public views of the site were identified.

4.12 In consideration of the above, I am of the view that the potential for the development proposals be in conflict with this element of Policy 1 are minimal.

Development proposals should demonstrate how they will: protect the rural character of Thornbury's local environs, taking into account Thornbury's location in the bowl of the Severn Vale (see Figure 6.

Severn Ridges Plan).

4.13 For ease of reference the TNDP Figure 6: Severn Ridge Plan (taken from the South Gloucestershire Landscape Character Assessment SPD, Adopted November 2014) is reproduced as PJR-16. In addition, to better understand the 'bowl' concept, I have prepared PJR-17 a revised version of the Topographical Study work provided in the LVIA (Figure 13.1 within the LVIA) to highlight:

- The extent of the Severn Vale/Valley Floor
- The hills and ridge which wrap around the southern, eastern and north-eastern sides of the town framing the 'bowl' within which the town sits.

4.14 The supporting text to Policy 1 notes:

"The distinctive and valuable nature of Thornbury's surrounding landscape has been officially recognised. This view is supported by the South Gloucestershire Landscape Assessment, 2014 which stated:

"Further expansion of the town would become more prominent were it to extend over elevated slopes, visually increase the apparent expanse of Thornbury within the bowl landform, or spread out beyond the bowl. The ridgeline backdrop and skyline also currently provide an intact rural feature and setting to Thornbury. It is therefore sensitive to change which would visually erode this feature".

4.15 It summarises this position in the following paragraph (Page 17, Fourth Paragraph, which introduces Policy 1, when it states:

*"The Rural Character and Landscape Setting Policy favours any future development to be on **the flat, not the hillsides**, to ensure Thornbury stays within the bowl of the Severn Vale and does not impinge on the Severn Ridges". (Author's underlining)*

4.16 As shown in my Topographical Study drawing PJR-17, the site lies on the 'flat', not the 'hillsides'. Furthermore, the site benefits from the notable woodlands immediately to the west and south-west of the site which encloses the site and cut it off from the Vale to the west. The shallow ridge

of the high ground to the north of Oldbury Lane similarly cuts the proposals off from the landscape to the north of this shallow ridge. The development proposal sits, and stays, within this 'bowl' and would not in any way "extend over elevated slopes" as referenced in the TNDP text (page 17, third paragraph).

- 4.17 Given the above, I believe it is clear that the proposed development would not be in conflict with Policy 1. Indeed, given the supporting text notes, "***The Rural Character and Landscape Setting Policy favours any future development to be on the flat, not the hillsides***", I believe the proposal complements the 'Objectives' of Policy 1.

Policy 17 – Planning for Green Infrastructure, Biodiversity and Food.

- 4.18 The following elements of this policy relate to landscape:

"Proposals should also avoid damage to mature trees and hedges, not only those subject to Tree Preservation Orders, and respect the pattern and form of the landscape. Creating links for wildlife within new developments, forming "bridges" across existing green spaces and wildlife corridors and the network of wooded paths in Thornbury will be essential to avoid creating environments hostile to biodiversity. "

- 4.19 The introduction would not necessitate the loss of any TPOd or Veteran trees. Whilst the Arboriculture Impact Assessment [ESD J13.32] provided within the ES confirms the development would require the removal of 19 of the 130 trees considered within the tree survey none of these 19 trees are A grade, only one is B grade and the remaining 18 are either recorded as "Low Value" or "Unsuitable for retention". The loss of these trees would be more than offset by the 100 plus trees to be planted within the housing areas and the surrounding parkland. In addition, all woodland within the site would be retained and enhanced (1.16ha) and 0.95ha of new semi-natural broad leaved woodland would be created. The development would provide a 4.00% biodiversity net gain (see EAD Ecology's BNG Technical Note - Nick Matthews Appendix NM4). With regards to the site's hedgerows approximately 36% would need to be removed but the remained would be enhanced and, as noted in the BNG Technical Note, the development overall would provide a 41.32% net gain in Hedgerow Value. As illustrated

in the Green Infrastructure Plan provided within the DAS Design Rationale (see PJR-18), the green infrastructure strategy was an important element in the evolution and thinking of the development proposals. The green infrastructure retains those features of greatest value and through a combination of the provision of new planting, new areas of informal public open space along and around the Pickedmoor Brook, these will provide multifunctional corridors for the movement of flora, fauna and people. In light of this, I believe the proposals accord with this Policy.

4.20 The design team recognised the existing and potential value of the Pickedmoor Brook (also known as Pickedmoor Rhine) corridor and accordingly this area is identified as parkland /habitat protection. Habitat creation would include the creation of meadow grassland, ponds and hedgerows and woodland and specimen tree planting. The overarching approach would protect and enhance these features of greatest value, enhance the green infrastructure corridors along Pickedmoor Brook and north across to the adjoining Park Mill Covert. As illustrated in my PJR-19 the proposal would extend and enhance the town's existing green infrastructure, public open space and, as referenced earlier in this statement, enhance connections to the many public rights of way around the site.

Policy 18 – Creating connections through Streamside Walks

4.21 Policy 18 states:

“Applications for development are encouraged to show how they will connect to and enhance the Streamside Walks so that these become a thread running all the way through Thornbury, connecting various areas of the town. The ecological impact of proposals should be clearly stated. The Walks should:

- Provide routes that support wildlife and biodiversity, are rich in tree and other planting and accessible by foot and bicycle*
- Incorporate new links to and from the Streamside Walks to housing developments for pedestrians and cyclists, integrating with an enhanced walking and cycle network across Thornbury*

- *Create trails which enhance safety and security through natural surveillance*
- *Provide unobtrusive lighting along the Streamside Walks*
- *Enhance the environmental quality of the habitat, biodiversity and trees along the Streamside Walks*

In the longer-term, development opportunities that provide scope to reconnect missing links along the Streamside Walks, creating a seamless connected route, will be welcome.”

4.22 There are two existing public rights of way (PROW) that pass through the site which provide access to the surrounding countryside from the edge of Thornbury and link through the Park Farm residential site (see PJR-9 Public Rights of Way plan). As illustrated on the amended Thornbury NDP Green Infrastructure Plan (PJR-19), these routes include OTH/18 which runs north south between Oldbury Lane and the existing urban edge at the north eastern corner of the site. OTH/13 runs east-west from the adjoining urban area, and the streamside walk along PROW OTH/40 west along the Pickedmoor Brook watercourse. The proposed scheme retains the public footpath (OTH/13) and would introduce a number of additional circuitous footpath routes around the adjoining fields which are to be managed as wildflower meadows (see PJR-13 the Illustrative Landscape Masterplan) .

4.23 It is understood the routes of these unpaved rights of way could be improved so as to make this footpath walkable without wellingtons or walking boots throughout the year. These improvements would be provided through conditions.

4.24 It is clear that the delivery of the housing scheme would provide new connections allowing pedestrians on the Pickedmoor Brook footpath to travel north through the housing scheme and its various open spaces onto Oldbury Lane, where walkers could link onto several existing PROW which travel north off Oldbury Lane into the wider countryside. This includes OTH/15, OTH/17 and OTH/60. It also stands to reason that walkers on these footpaths north of Oldbury Lane could now pass southwards onto OTH/13 and the Pickedmoor Brook stream walk into Thornbury.

4.25 Given the above, I believe it is clear that the development would enhance walking opportunities within the area and the proposals are in accordance with this policy.

5 THIRD PARTY REPRESENTATIONS RELATING TO LANDSCAPE MATTERS

5.1 The following public consultations were undertaken in the preparation of the application:

- January 2019 (following application submission in December 2018)
- March 2020 (following application resubmission)
- September 2020 (following submission of revised masterplan and DAS)

5.2 Taken together there are approximately 80 third party representations of which 19 make some reference to landscape and visual issues. These 19 representations have been compiled in the Landscape and Visual Third Party Consultation Tracker provided as Appendix I to my Landscape Statement. In reading these representations it is clear there is a considerable amount of overlap in the representations. To aid the Inquiry, I have distilled the representations down into the four following landscape and visual concerns and criticisms:

1. The proposed development will result in the loss of countryside, change views and urbanise the site and the wider area.

5.3 The Landscape Chapter of the ES [ESD J13.13] acknowledges that the introduction of the development would give rise to a substantial adverse effect to LLCA-1: 'Edge of Settlement Floodplain Pasture', (the 'local landscape character area' within which the site is located) and this adverse effect would endure into the long term. However, as a result of a combination of the wealth of woodlands/trees and hedgerows to the west and south, and the shallow ridge line to the north, the ES identified that the significant adverse landscape effects would be focussed on the site and its immediate environs and they would not 'ripple out' into the wider countryside (see Table 1 provided earlier in my Statement).

5.4 Similarly with regards to visual amenity, the containment provided by a combination of nearby built form, topography, trees and hedgerows the adverse effects are all within and in close proximity to the site, i.e. visual receptor groups A, C and D (see Table 1 which summarises Visual Effects).

These are the visual receptors located alongside Oldbury Lane, views from the adjacent Park Farm and views from the public footpath (OTH/13) which runs alongside Pickedmoor Brook through the site. The visual assessment identified no short or long term significant adverse visual effects from viewpoints located in the town, from the rising ground/hillside to the north-east or from the landscape west of Parkmill Covert (including villages, roads and footpaths in the landscape to the west).

2. The proposed houses are lifted significantly above the existing ground levels

5.5 Several representations raised a concern that proposed built form will sit higher in the landscape. I would confirm that the ES Landscape Chapter (including the computer generated visualisations provided within the ES Landscape Chapter Appendix 13.4, Drawings 16-10-PL-300 to 314) has allowed for proposed houses to be placed 1 metre above existing ground levels. This is so as to allow for flood risk advice (ES Chapter 8: Water Environment, Para 8.6.13) and for earthworks and ground modelling as noted on the Building Heights & Parameter Plan (for ease of reference pages 78 & 79 of the DAS providing proposed 'Building Heights' has been reproduced as PJR-19. This 1 metre uplift is the worst case scenario and is provided in the building heights parameters so as to allow flexibility across all development parcels should any ground profiling be required. Whilst the LVIA has allowed for this, it is anticipated that this uplift would not be required across most of the site.

3. The proposals would result in the loss of the protected ancient hedgerows and trees

5.6 As noted in my consideration of the TNDP Policy 17 it is regrettable that the development proposal would necessitate the removal of a number of hedgerows and trees. However, as noted earlier in my Statement, the development would not necessitate the loss of any TPOd or Veteran trees. Whilst the development would require the removal of 19 trees, none are A grade, only one is B grade and the remaining 18 are either recorded as "Low Value" or "Unsuitable for retention". The loss of these trees would be more than offset by the 100 plus trees to be planted within the housing

areas and the surrounding parkland. In addition, all woodland within the site would be retained and enhanced (1.16ha) and 0.95ha of new semi-natural broad leaved woodland would be created. The development would provide a 4.00% biodiversity net gain (see EAD Ecology's BNG Technical Note - Nick Matthews Appendix NM4). With regards to the site's hedgerows approximately 36% would need to be removed but the remained would be enhanced and as noted in the BNG Technical Note, the development overall would provide a 41.32% net gain in Hedgerow Value.

- 5.7 Whilst it is always regrettable to lose trees, I believe it is clear from the above that the development proposals have kept most of the trees, and those that need to be lost are not veteran or the better trees on the site. The development proposals would see the planting of over 100 individual trees and 1.06ha of new woodland. I believe it is clear that this planting would more than offset those trees and hedgerows that would be lost.

6 SUMMARY

6.1 In preparing the development proposal and the supporting Landscape Chapter of the Environmental Statement, my practice engaged with SGC officers and development proposals so as to respond to officers' concerns and requests.

6.2 Our engagement with SGC officers extended over a 15 months period, extending from February 2019 to the last virtual meeting in May 2020

6.3 The Landscape Chapter submitted with the application was reviewed by SGC's landscape officer, Angela Bence-Wilkins in her initial landscape comments (dated 20th March 2019 – see Appendix A). Ms Bence-Wilkins noted that she considered the LVIA to be, **“thorough and comprehensive”**.

6.4 The principal concerns raised and changes made included:

- The LVIA's approach to determining boundaries between local landscape character areas
- The extent of the development westwards
- The design of the SuDS
- The approach and information shown in the Zone of Theoretical Visibility studies
- Changes to Oldbury Lane and the proposals' north west frontage
- The visual role of St Mary's Church from Oldbury Lane and the footpaths to the north of the site
- Crafting 'vistas' and 'priority vistas' into the masterplan proposals.

6.5 All of these issues were addressed through our meetings with officers and the submission of additional and revised proposals, culminating in the SGC's landscape officer, Jane Jarvis' consultation response of 25th September 2020 stating:

“Following the design consultation meeting held with the applicants/consultants, the landscape related test and diagram amendments to the DAS are all acceptable.” (Author's

highlighting)

With regards the north-west corner of the site, Ms Jarvis consultation response noted that subject to minor amendments the, ***“agreed enhancements to proposals address previous landscape concerns.”*** (see Appendix B).

6.6 I understand that it is possible that the Thornbury Neighbourhood Development Plan (TNDP) will be ‘made’ ahead of the opening of the Public Inquiry on 29th March 2022. In consideration of this my Landscape Statement has considered and shown that the development proposals would not conflict with the following TNDP Objectives, Vision and Policies:

Thornbury Neighbourhood Development Plan: Our Vision

6.7 Given the proposals will extend available green spaces, enhance the Streamside Walk along Pickedmoor Brook and it will provide new walks through the site to the adjoining network of public rights of way, the proposals would be in accordance with this policy.

Thornbury Neighbourhood Development Plan: Policy 1: Rural Character and Landscape Setting

6.8 The development proposals would accord with all four of the policy requirements.

- The development would not be visible from most of the Key Views identified in the TNDP. In those locations where the proposed development might be discernible I believe, given the distance and the intervening built form and vegetation, the proposals would not be incongruous nor would they block or detract from the views over the Severn Vale to the Severn estuary and the Forest of Dean beyond.
- In providing 6.8Ha of public open space with good connections into Thornbury along existing adjoining footpaths, it would protect and enhance existing routes and provide a number of new, presently unavailable, routes to adjoining rights of way.
- With regards to neighbouring villages and hamlets, my landscape statement has looked at these settlements and, given their distance

and early work undertaken in the preparation of the ES Landscape Chapter, I believe the proposals would not harm the setting or character of these villages or hamlets.

6.9 Finally, with regards to protecting the “character of Thornbury’s local environs” and the town’s “location in the bowl of the Severn Vale”, I would note the ES Landscape Chapter identified that the site’s landscape and visual relationship with the wider countryside is well contained as a result of the well-established mature woodlands and trees to its west and south-west, and a shallow ridge to the north. As such, whilst the site would experience a change from fields to urban form, giving rise to a significant adverse effect, the context provided by the surrounding trees and topography coupled with additional planting means this effect would be limited to the site and its immediate environs and would not ripple out into the wider countryside. To assist the Inquiry I have produced PJR-17: Site Location, Topographical Study and Thornbury Bowl which shows how the high ground to the south, east and north-east of the town forms a ‘bowl’ within which Thornbury sits on its north-western facing slopes. Supporting text to Policy 1 notes:

“The Rural Character and Landscape Setting Policy favours any future development to be on the flat, not the hillsides, to ensure Thornbury stays within the bowl of the Severn Vale and does not impinge on the Severn Ridges.”

6.10 I believe PJR-17 demonstrates that the proposals are in accordance with this policy.

Thornbury Neighbourhood Development Plan: Policy 17: Planning for Green Infrastructure, Biodiversity and Food.

6.11 An element of this policy refers to the retention of trees, hedgerows and the need to form ‘bridges’ across existing green spaces and wildlife corridors. Whilst the development proposals will necessitate the removal of a proportion of the site’s hedgerows, many of these hedgerows are identified in the ecological surveys as “species poor hedgerows” and “species poor hedgerows with trees”, i.e. most of the more valued species rich hedgerows have been retained. Furthermore, a significant proportion of these removed hedgerows could be translocated to new locations around the site. The

development would enhance the value of those hedgerows retained and it would translocate approximately 830 linear metres of hedgerow to new locations within the site. In light of this the BNG Technical Note identifies that the development would provide a 41.32% net gain in Hedgerow Value. .

6.12 Similarly, with regards to the site's trees, whilst the development would necessitate the removal of 19 trees this is a small part of the 130 or so trees identified in the tree surveys. Over 110 trees would be retained and of the 19 trees to be removed, only one is identified in the Arboricultural Impact Assessment as Grade B value, the other 18 being a combination of Grade C "trees of lower value" Grade U trees "unsuitable for retention". The development proposals would see in excess of 100 individual trees planted both within the site and within the parkland landscape to the south. In addition, many hundreds of trees would be planted in the structure planting identified along the site's western boundary adjoining Parkmill Covert and along the Oldbury Lane frontage. Whilst it is always regrettable to lose trees, I believe it is clear from the above that the development will only require the removal of a modest proportion of the site's hedgerows and trees and this modest loss will be more than offset by the planting proposals.

6.13 As illustrated in the Green Infrastructure Plan provided within the DAS Design Rationale: Green Infrastructure (PJR-18), the green infrastructure strategy was an important element in the evolution and thinking of the development proposals. The green infrastructure retains those features of greatest value and through a combination of the provision of new planting, new areas of informal public open space along and around the Pickedmoor Brook, these will provide multifunctional conditions for the movement of flora, fauna and people. In light of this, I believe the proposals accord with this Policy.

Thornbury Neighbourhood Development Plan: Policy 18: Creating Connections through Streamside Walks

6.14 The housing scheme would retain the existing right of way OTH/13 which passes through the site. The nature conservation and recreational value of the surrounding floodplain/public open space would be enhanced as it

would be managed for nature conservation value. The introduction of the scheme would provide new connections to footpaths within the site and to the existing footpaths located to the north of Oldbury Lane. Given these improved connections within the site and to the wider network of rights of way the proposals would be in accordance with Policy 18.

6.15 In preparing this landscape statement I have carefully reviewed all of the third party representation as they relate to landscape and provided them in Appendix H. Given the considerable overlap in these representations, I have distilled them into four landscape and visual concerns and criticisms.

The proposed development will result in the loss of countryside, change views and urbanise the site and the wider area

6.16 This point has a notable overlap with the Thornbury Neighbourhood Development Plan Policy 1 and so I will refer my response on this point to my earlier paragraph 6.8 – 6.10 in which I note that whilst the introduction of development will give rise to some significant adverse landscape and visual effects, the surrounding trees and topography coupled with additional planting means this effect would be limited to the site and its immediate environs and would not ripple out into the wider countryside.

The proposed houses are lifted significantly above the existing ground levels

6.17 As noted in the DAS, Building Heights Parameter Plan (pages 78 & 79), the buildings may at times need to be lifted a maximum of 1 metre above existing ground levels to avoid flood risk. It is anticipated that the lifting would vary across the site. The Landscape Chapter and the supporting Computer Generated Images/visualisations have allowed for this.

The proposals would result in the loss of protected ancient hedgerows and trees

6.18 As noted above in considering the TNDP Policy 18 the proposals would only necessitate the removal of a small number of trees (19No) and of the hedgerows lost a large proportion could be relocated within the site. The proposals would bring forward the planting of a significant higher number of trees and this coupled with the 6.8Ha of open space would enhance the

site's nature conservation value.

6.19 In summary, the Barwood team have liaised closely with SGC officers, both prior to and since the application was submitted. During this time we have attended a number of meetings and revised the proposals to take account of SGC's comments and queries. This has resulted in the high quality landscape scheme now before the Inquiry; a scheme which is sensitive to both the site itself and its wider setting. This period of engagement and the detailed discussions involved resulted in both the Urban Design and Landscape officers confirming that their concerns had been suitably addressed and that they were satisfied with the development proposals. In light of the above I commend this scheme in respect of its acceptable landscape impacts and merits.