

South Gloucestershire Council

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Memorandum to:

Charmian Eyre-Walker

Copy to:

From: Jane Jarvis

Date: 23 March 2023

Our Reference: P22/01300/O

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RE: LAND AT SODBURY ROAD, WICKWAR GL12 8PG

1.0 Description of Proposal and Its Context

- 1.1 This is an outline application for the erection of up to 180 dwellings, a local shop and associated infrastructure (Outline) with access to be determined; all other matters reserved.
- 1.2 Further comments are given in blue text below in respect additional issues noted during joint site view with the Case officer on 7 June 2022, and in green in respect of revised information submitted March 2023.
- 1.3 The site extends to some 8ha and comprises a series of 5No. agricultural fields off the west side of the B4060 Sodbury Road at the southern end of Wickwar, which wrap around the rear of Nos. 64 to 86, which front onto the road. The site directly fronts onto the B4060 to the south of South Farm, with a broader frontage to the south of No. 86. A number of field hedgerows (predominantly Hawthorn) with scattered, mature trees sub-divide and bound the site fields (except SW field boundary), although the western boundary of the southern large field is not contained by a hedgerow. Group TPO 113 covers the Willows along the NE frontage of the site, which form a local landmark in views along the B4060. The site falls in level from just over 90m AOD within its SE corner by the Sodbury Road to just above 83m AOD at its NW corner. A ditch extends along the northernmost two thirds of the western site boundary.
- 1.4 Grade II* listed Frith Farm lies some 0.5km SW of the site. Grade II listed South Farmhouse lies adjacent to the NE corner of the site. The southern edge of the Wickwar Conservation Area lies some 0.33km further north along Sodbury Road. Recent residential development (PK16/4006/O) lies opposite the central part of the site on the eastern side of Sodbury Road, with further housing under construction (PK17/4552/O) to the south of Horwood Lane opposite the SE site road frontage.
- 1.5 A number of public footpaths cross the fields to the west and south of the site, and conservation area to the north, as well as connecting with Sodbury Road on the eastern/opposite of the site. Wickwar Ridge lies to the west of the site and village and the Churchill Ridge to the east; both are Visually Important Hillside under SGC Policy CS2.
- 1.6 The proposed development will be accessed off Sodbury Road to the south of South Farm, and south of No. 86 with a connecting spine road running through the development. The houses will be laid out within 3No. large parcels comprising 'outward' facing perimeter blocks. The housing will be up to 2.5 storey in height. Open space will be located within the NE margin of the site between the spine road and listed farmhouse, and within the western margin of the site, with 2No. connecting greenways extending along the hedgerows within the central site area to sub-divide the development footprint. The western ends of the 2No. greenway have been slightly widened on Revision M of the Framework Masterplan to better accommodate the siting of a LAP and LEAP. A series of 3No. attenuation basins is now proposed within the western POS

zone with a swale extending eastwards between the southern and central development areas and rain garden within the central housing zone. Allotments will be located adjacent to the northern site entrance, and a potential shop to the north of the southern access point.

- 1.7 Screening request submitted in November 2021, under reference P21/030/SCR. Consultation feedback advised that an application be supported by the following information:
- Proposed scheme should take into consideration guidance set out in the adopted South Gloucestershire SPDs:
 - Landscape and Visual Impact Assessment (LVIA) to GLVIA 3, including a cumulative assessment, and agreement of representative assessment viewpoints.
 - A current tree and vegetation survey, and tree protection plan, to BS5837:2012.
 - Proposed landscape design and mitigation strategy plan, supported by a list of proposed planting species, demonstrating how a robust, integrated, and multi-functional open space and green/blue infrastructure will be delivered as part of the development.
 - A framework landscape and ecological management plan (LEMP) for the whole development site.

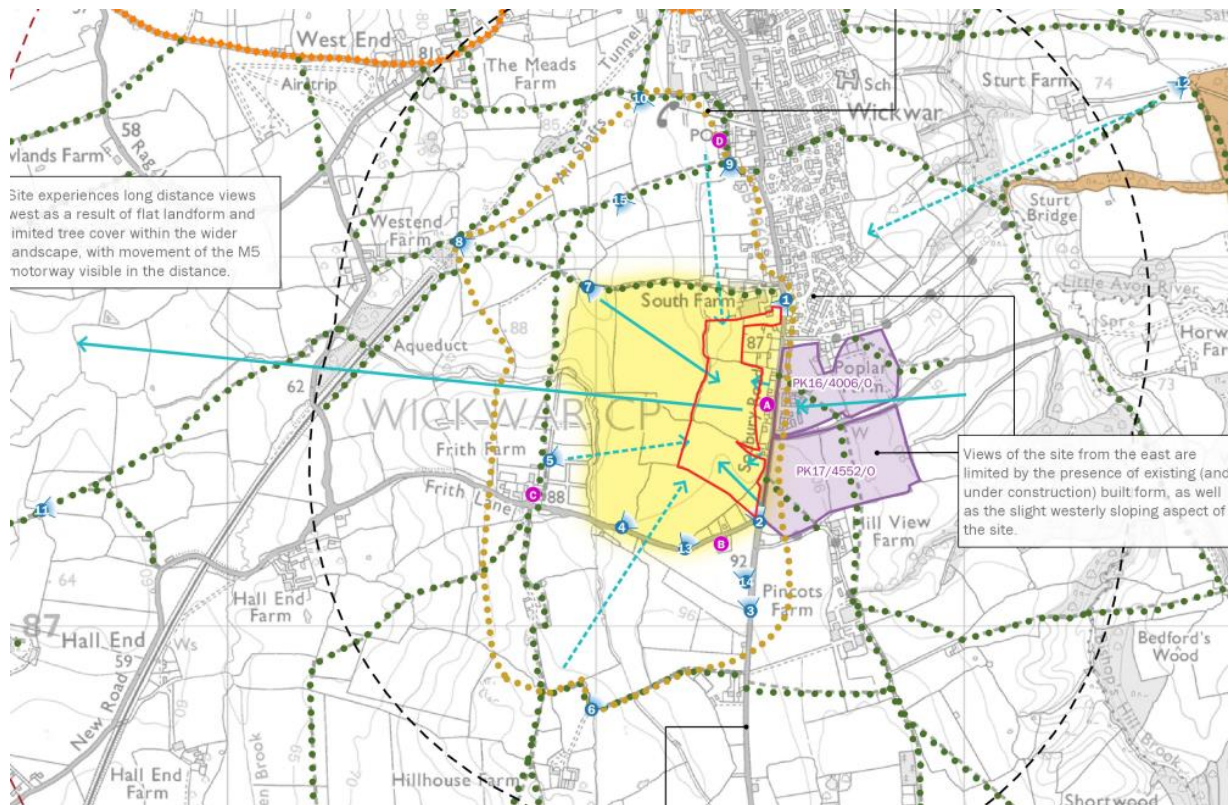
2.0 Policy Context and Guidance

- 2.1 The following policies apply to the site:
- **NPPF July 2021**
Section 12 (para. 131): Important contribution of trees
Section 15: Conserving and enhancing the natural environment
 - **National Design Guidance January 2021**
Part 2: The ten characteristics, including landscape related Context C1 and C2, Identity I1 to I3, Built Form B1 to B3, Movement M1 to M3, Nature N1 to N3, Public Spaces P1 to P3, Homes and Buildings H1 and H2.
 - **SG Core Strategy (Adopted December 2013)**
CS1: High Quality Design
CS2: Green Infrastructure
CS5: Location of Development
CS9: Managing the Environment and Heritage
CS34: Rural Area
 - **Policies Sites & Places Plan (Adopted November 2017)**
PSP1: Local Distinctiveness
PSP2: Landscape
PSP3: Trees & Woodland
PSP8: Residential Amenity
PSP17: Heritage Assets and the Historic Environment
PSP40: Residential Development in Countryside
 - **South Gloucestershire Landscape Character Assessment SPD (Revised and Proposed for Adoption November 2014)**
 - Site lies within LCA 5: Wickwar Ridge and Vale.
 - **Green Infrastructure: Guidance for New Development SPD (adopted April 2021)**
 - **Trees and Development Sites: Guidance for New Development SPD (adopted April 2021)**

3.0 Analysis of Proposed Scheme and Information Submitted

- 3.1 LVA (Feb 2022):
- A LVA rather than a more comprehensive LVIA has been provided. Also, no cumulative landscape and visual assessment of the scheme in conjunction with the 2No. new housing developments to its east has been undertaken despite this being advised as part of the Screening Opinion feedback.
 - EDP 2: Site Character and Context – Landscape Officer comment on analysis:
 - Points 1 and 5 - the plan clearly shows that development along the western side of Sodbury Road is generally more linear and limited form (as noted in LVIA para. 2.3), with the focus of C.20 and C.21 residential growth being along the eastern side of the B4060. Adjacent to the site, existing development is generally limited to one plot depth, which facilitates gap views of, and a sense of connectivity with, the countryside lying west of Wickwar; note one such view annotated on EDP Plan 3.

- Point 4 – the southern section of the western site boundary cuts across a large field and is not delineated by a field hedgerow.
- Point 6 – there is no mention that the SW part of the conservation area comprises open land crossed by several public footpaths, which afford views of the open countryside to the west and south (including towards the site).
- Extract of updated Plan EDP3 showing assessment viewpoints:



- EDP 3: Findings of EDP's Visual Appraisal - representative assessment viewpoints have not been agreed with SGC, as requested in Screening Opinion feedback. Potential visual effects also need to be assessed from the following viewpoints:
 - There is a sequence of views between South Farm and VP7 on the footpath/linear receptor lying parallel to the northern site boundary, including viewpoints with more open/worse case views of the proposals than depicted by VP7 and at least one additional, intermediate viewpoint needs to be assessed.
 - There are also views between VPs 7 and 8 on same route, and a further intermediate/worse case view needs to be also assessed from here.
 - Footpath LWR/25 within the CA, further west of VP 9, to complete the visual analysis provided by VPs 9 and 10. On the footpath extending between VPs 8 and 9, which follows the southern boundary of the CA, there are views back to the Grade II* listed church in the CA and also clear views across the site to the buildings being constructed on the opposite side of Sodbury Road. There are clear view lines/vistas towards No. 1 Frith Lane/VP 4, the views from which is discussed below. There is no clear view of the site from the Royal Observer Corp Volunteers pill box.
 - Frith Lane between VPs 2 and 4, where a field gate affords a clear view towards the site and surrounding part of Wickwar. From VP 4 the proposed POS margin will appear foreshortened in the view. The tower of the Grade II* listed church of The Holy Trinity, within the conservation area, is clearly seen on the skyline to the left (north) of the listed South Farm. Current, proposed layout would not preserve this view line/vista. There is also a clear view of the church tower from opposite No. 1 on Frith Lane, and there may be other noticeable views of the church in the vicinity of VPs 2 and 3 in winter when adjacent skyline trees have lost their leaves.
 - There are open/panoramic views from the section of Sodbury Road across the southern part of the site (in the vicinity of VP2) of the wider landscape setting of Wickwar and

countryside surrounding it; these will be wholly lost in terms of the current development proposals.

- B4060 between VPs 2 and 3, where there is a more open view than that from VP 3; the proposed housing within the SE corner of the site/frontage will be visible and will effectively 'combine' with the new housing on the opposite, east side of Sodbury Road to create an 'enclosed, built corridor' approach into the village.
 - Consider that there will be some key views of the proposals from the footpath route crossing higher land near VP 5/paddocks, in which the new housing will be quite noticeable/prominent rather than just glimpsed as annotated on the plan; this needs further review in the LVA.
 - The proposals will be seen in views from the listed Frith Farmhouse.
 - Consider that the Zone of primary visibility needs to be extended to take account of the above site observations (e.g. pass VP 7 and also to take in VP5).
 - Wireframes/photomontages/AVRs should be provided to illustrate the change in view from key viewpoints, at Year 1 and with the proposed mitigation in place between years 5 to 15 for example.
- EDP 4: Landscape Opportunities and Constraints – identifies the opportunity to frame a view northward across the site towards Holy Trinity Church, lying at northern extent of Wickwar, which is also highlighted in LVA para 6.1 (bullet point 7). A potential vista towards the church is now shown along the northern section of the primary internal road on Landscape Strategy Plan EDP 6190-d026 Rev. A, together with a second view from the northern part of the western POS zone (see further comment below).
 - LVA para 3.7- Group TPO 113 covers the Willows within the NE site margin.
 - Para. 4.22 assesses the overall landscape sensitivity of the site as being 'medium'.
 - Para. 8.3 acknowledges there will be a fundamental change to the character of the site, and Paras. 8.8 and 8.9 acknowledge that the effect on the surrounding part of LCA 5: Wickwar Ridges and Vale cannot be fully determined at outline planning stage, although overall this is expected to be of 'low magnitude'. Landscape Officer considers that the impact on LCA will be of higher magnitude in the vicinity of Wickwar area of LCA 5.
 - Defer to further comment from the Conservation Officer in terms of the impact of the proposals on the setting of the listed South Farmhouse and the Wickwar Conservation Area. Note from a heritage perspective, that no key views towards or from the Conservation Areas have been identified as being affected by the proposals.
 - Defer to further comment from Urban Design Officer on the appropriateness, siting, scale and appearance/character of the proposals.

3.2 Comments on LVA Addendum (February 2023):

- Section 2.1 states 3No. additional assessment viewpoints were requested, when in fact the above advice discussed some 6No. additional locations; Table 4.1 identifies new VPs 13-15 are respectively located at the field gate along Frith Lane (between VPs 3 and 4), field gate along B4060 (between VPs 2 and 3), and PROW LWR/25 NW of the site (between VPs 8 and 9), as shown on the plan extract above.
- Some of the original site photographs have been updated.
- The cumulative impact of the proposed scheme in conjunction with the 2No. recent development sites along the eastern side of the B4060 is assessed as requested. Note that the application is double the size of these two sites in terms of units, which in combination accommodate up to 170No. dwellings.
- Section 2.1 does not list all the concerns raised in the landscape consultation feedback.
- Disagree with the conclusion in Para. 7.2 that the proposed revisions to the proposals address/take into account the concerns of the Landscape Officer.
- Not able to find GI Plan -3601 Rev. E.

3.3 Existing Vegetation:

- Arboricultural Impact Assessment (Sept 21) identifies some 23No. individual trees, 4No. tree groups and 13No. hedges within the site including a Category A Oak at the SW corner of site, and 9No. individual and 2No. groups of Category B trees that largely lie within the northern site area.
- Tree Impact and Retention Plan in Appendix 3 of the AIA shows that the southern part of TPO group GI (i.e., 2No. Category B Willows) will be lost to accommodate the new northern spine road entrance, and that a section of Hedge 10 and Trees T18 and T19 will need to be removed to accommodate the southern entrance access. The AIA does not show that some

hedgerows will need to be removed to accommodate the internal housing and road layout as indicated on DAS Figure 25, p.63, or prescribe any tree protection fencing/measures, and will need to be updated to support any RM application. Defer to further comment from the Tree Officer.

- A calculation of the required number of replacement trees will be required with reference to Page 13 of the Trees and Development Sites: Guidance for New Development SPD.
- SGC tree strategy (2011-22) has the target of increasing tree cover across South Gloucestershire to 15% (Ref. national DEFRA target of 15% as minimum needed to adapt to a projected changing climate).

3.4 Landscape Design and Mitigation Strategy:

- Neither Framework Masterplan -3001 Rev. H or DAS Figure 25: GI Parameter Plan (*previous Figure 25 no longer included*) do not provide a sufficiently detailed landscape design and mitigation strategy plan, as previously advised would be required to support the application. Landscape Strategy Plan EDP 6190-d026 Rev. A is annotated with more detailed notes, which is helpful, but is not supported by a schedule of typical tree and plant species as previously requested. The wildlife pond and orchard within the NW POS area are welcomed. The 2No. potential view corridors towards the listed church appear to conflict with both proposed built footprint and tree planting locations on the plan, rather than being of comfortably framed and by such features. routes. New tree planting opportunities within the western POS zone are still limited by the footprint of proposed SuDS basins, and along the southern boundary of the site by the proximity of the proposed built footprint.
- DAS Figure 27: Drainage Plan and Figure 26 cross-section show that the proposed SuDS basin footprint will occupy most of the central area of the western POS zone thereby limiting its recreational usage and space for new structural mitigation planting (*previous Figures 26 and 27 no longer included*). Similarly, the proposed swale footprint will allow for little meaningful tree/structural planting between the central and southern housing blocks. Framework Masterplan -3001 Rev. M shows that although the original large SuDS basin has been divided into 3No. basins, the character and recreational usage of western POS area will still be dominated by these features. The widening of the western sections of the 2No. greenways is welcomed but does not overcome the fact that most of the POS provision is located along the northern and western peripheries of the site. Note that the Design West Panel also were concerned about this issue.
- Framework Masterplan -3001 Rev. M indicates a more extensive network of footpath links between the 3No. development parcels and western POS, together with the opportunity to provide an off-site link to connect with the PROW network lying to the NW of the site. Landscape Strategy Plan EDP 6190-d026 Rev. A shows these links as being mown grass, which is not acceptable in terms of facilitating around year recreational usage. Defer to further comment from the POS Officer in terms of the distribution of POS categories and uses.
- The footprint of the 3No. blocks of proposed housing will encroach into the surrounding countryside, Additional tree planting strips are shown along sections of the northern and eastern boundaries DAS Figure 25: GI parameter Plan, but the design of the western or southern site boundary treatments do not demonstrate delivery of a well-designed, articulated green edge/buffer between the proposed housing and wider countryside, and therefore, will not provide the 'softened transition to the adjacent countryside' cited at LVA paras 6.1 and 7.4, for example. With reference to both the Framework Masterplan and Landscape Strategy Plan, the central and southern parcels still present a 'hard and uniform' western and southern development edge, with little articulation with the POS zone except for its the junction of the dividing E-W greenway. The 'green edge' zones on Figure 29 of the DAS, described on p. 78, and illustrated on Figure 30 appear to be mostly built form with some frontage onto shared streets and drives (Ref. Figure 24), and little opportunity for any meaningful structural planting or transitional built/green edge treatment. In contrast, the proposed layout accommodates orchard tree planting adjacent to the western edge of the northern parcel, which is welcomed.
- Framework Masterplan -3001 Rev. M indicates some additional tree planting along the spine road including a rain garden within the central development parcel. The space currently allowed for street trees along the primary access road appears constrained by the proximity of building elevations and drainage routes. However, an appropriate quantum of tall, broad growing trees (12m plus height), with space to mature to full height and spread, would be required across the whole site so that these are seen above and between the new roof tops, provide appropriate screening in views, and form new structural/focal landscape features..

- 3.5 Framework LEMP:
- No framework LEMP has been provided to support the application, as previously advised. No information provided.
- 3.6 The above analysis has been undertaken as a desktop study, and with reference to published guidance and internet imagery such as Google Earth and Street View.

4.0 Conclusion/Recommendation

- 4.1 The planning application document and plan bundle does not include all the information required to support the application, as advised at the pre-application and earlier consultation stages.
- 4.2 From a landscape perspective, the proposed development is not acceptable in its current form given its encroachment into the countryside west of Wickwar, which is not in keeping with the established settlement form along the west side of the B4060. The village has principally expanded southwards from the Conservation Area along the east side of Sodbury Road thus preserving a single plot/shallow depth of development along the western side of the B4060 (see DAS p.18 and 19 diagrams). Rather than adjoin the built edge of existing development along the western side of the B4060 the northern site parcel will be off-set from this to effectively form an 'outlier' of housing. Development of the whole site will result in a noticeable south westerly projection to the built village footprint, which will have a significant adverse impact on the rural character of its westerly landscape setting.
- 4.3 Furthermore, the proposed development lacks a well-articulated and appropriate green transitional edge, together with other appropriate mitigation measures as described above in Section 3. The revised proposals still show the central and southern development parcels presenting a very 'hard and uniform' western and southern edge, which will adversely impact views from the public footpath and lane network lying to the NW, W and S of the site.
- 4.4 Although the recent, eastern development along the B4060 intrudes into the character of this rural approach into Wickwar, this is currently balanced by the open, undeveloped land within the site. The proposed development will result in the loss of existing open views across the southern part of the site to the countryside surrounding Wickwar, which forms its landscape setting (see VP 2 on the B4060, for example); and also, will impact on views both towards and from listed buildings.
- 4.5 In conclusion, there is a landscape objection to the proposed development.
- 4.6 If the application is given planning permission, the following will be required to be submitted by as a RM or condition application, as appropriate:
- Tree/hedgerow protection plan, including supporting construction method statements - agreed as part of enabling works/prior to start of main construction works, and calculation of replacement number of trees required.
 - Detailed Green Infrastructure and Landscape Design and Mitigation Strategy Plan
 - Phasing of all open space and landscape infrastructure works
 - Detailed planting plans specifying the location, species, stock size, planting centres and quantities of all proposed tree and structure planting (to be implemented in the first season following completion of construction works); including planting to open space and public realm areas, street frontages, site boundaries, and on-plot where this contributes to the wider landscape infrastructure. Locally indigenous native species should be included within naturalistic open spaces, with street tree species within more urban spaces, and supporting implementation specification.
 - A landscape and ecological management plan covering the enabling works operations/period and a subsequent 20 Year management period, identifying existing and proposed landscape and ecology related site assets, associated management objectives, schedules of annual maintenance work together with longer term management operations.
 - Details of all proposed boundary and hard landscape surface treatments, including proposed levels and any soil retention/retaining walls that may be required, together with supporting schedule of proposed manufacturer hard landscape materials and site furniture products.

- Detailed design for SUDs basins and features to demonstrate how these will be sympathetically integrated into open spaces/green corridors.
- Detailed designs for proposed play areas.

Regards

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Major Sites Team