

LAND AT SODBURY ROAD, WICKWAR, SOUTH GLOUCESTERSHIRE

LANDSCAPE PROOF OF EVIDENCE

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APPEAL BY BLOOR HOMES SOUTH WEST

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1.0 INTRODUCTION

Landscape Witness

- 1.1 I am Jane Jarvis, a Senior Landscape Planning Officer at South Gloucestershire Council. I have been practising as a Landscape Architect since 1989 and hold an Honours Degree in Landscape Design and Plant Science, a Diploma and Master of Art in Landscape Design, and am a Chartered Member of the Landscape Institute.
- 1.2 Within South Gloucestershire, I advise on planning applications for both the Major Sites, and Development Management teams, as well as working with the Local Plan team. My previous professional experience in the private sector has included Environmental Impact Assessments, acting as an expert witness, strategic master planning of new settlements, highway and railway infrastructure projects, renewable energy schemes, historic landscape appraisals, and long-term landscape management proposals. I have produced model Environmental Impact Assessment documents for the Highways Agency, audited Environmental Statements for a number of local authorities in England and Wales, and have worked with the Malvern Hills AONB Partnership to develop a pilot study to identify important view corridors.

Form and Scope of Evidence

- 1.3 This document contains my evidence on the key landscape and visual issues relating to the Appeal Site (hereinafter referred to as the site). I have followed the recommended approach in GLVIA3 (CD6.6) in terms of my analysis of the landscape and visual context of the site, its landscape value, the evaluation of landscape and visual effects, and my resultant judgements regarding the Appeal proposals as an expert landscape witness.
- 1.4 I confirm that the opinions expressed in my evidence are my true and professional opinions.
- 1.5 In Section 2.0, I consider the baseline context of the site based on my desktop study of the planning application documents and published landscape assessments, together with my own site observations.
- 1.6 In Section 3.0, I provide comments on the various design elements of the Appeal proposals, and the associated landscape and visual effects.
- 1.7 In Section 4.0, I consider landscape and visual related matters set out in the first putative reason for refusal, together with the effect of the Appeal proposals on the character and appearance of the local area.

1.8 I shall demonstrate that the proposed residential development (outline scheme) by reason of its location, scale and prominence will:

- not respect the historic development morphology of Wickwar, and is not in keeping with its current, established built linear form along the western edge of the B4060 Sodbury Road;
- fail to conserve and enhance the distinctive character of the rural landscape lying to the west of Sodbury Road, and the contribution that this area makes to the setting of the village;
- obstruct, and detract from, existing views across the landscape; and
- not accommodate sufficient or appropriate mitigation to allow the scheme to be satisfactorily assimilated into the local landscape.

1.9 Section 5.0 sets out my summary and conclusions.

1.10 I defer to the other Council's witnesses on their respective areas.

2.0 SITE CONTEXT

Location

- 2.1 The site extends to some 7.89ha and comprises a series of four 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, with a 'slither' of land retained between these properties and the eastern site boundary. The site directly fronts onto the B4060 to the south of South Farm, with a broader road frontage to the south of No. 86. The south-east corner of the site boundary touches the junction of Frith Lane.
- 2.2 A number of low field hedgerows (predominantly Hawthorn) with scattered, mature trees sub-divide and bound the site fields, with the exception of:
- the northern site boundary adjacent to South Farm, and
 - the southern end of the western site boundary, which cuts across the large rectangular field that extends further westwards.

Planning Designations

- 2.3 No landscape related planning designations cover the site.
- 2.4 Group TPO 1113 covers the Willows within the north east frontage of the site, adjacent to South Farm.
- 2.5 The Grade II listed South Farmhouse lies adjacent to the north-east corner of the site. The southern edge of the Wickwar Conservation Area lies some 330m further north along Sodbury Road, with the Grade II* listed Church of Holy Trinity on higher land at its northern end. Wickwar Conservation Area Advice Note SPD (adopted October 1998) (CD4.6) on page 5 notes that the church forms a focal point to the surrounding area. The Grade II* listed Frith Farmhouse, with its distinctive chimneys and elevational form, lies some 440m to the south-west of the site.
- 2.6 No public rights of way cross the site. However, a number of public footpaths cross the fields to the north-west and west of the site, and the Conservation Area to its north.

Topography

- 2.7 As shown by the orange-coloured contours on Diagram 1 below, the route of the B4060 Sodbury Road, the built linear form of Wickwar, and the site lie on a broad ridge of land between Yate Vale to the west, and the Little Avon Valley to the east with the Cotswold Scarp lying beyond. The western slope of the Wickwar Ridge is defined as a '*Visually*

Important Hillside' under SGC Core Policy CS2: Green infrastructure (Ref. Key-Strategic Green Infrastructure Network- Figure 1) (CD4.4) and has also been identified as an important green infrastructure asset within the current technical evidence base for the new Local Plan.



Diagram 1: Extract of 2020 aerial photograph showing Wickwar Ridge landform.

- 2.8 Lying on the westward facing top of the ridge, the site falls from just over 90m AOD within its south-east corner by the Sodbury Road to just above 83m AOD at its north-west corner.

[Landscape Character](#)

- 2.9 The site lies within Landscape Character Area (LCA) 5: Wickwar Ridge and Vale, as defined within South Gloucestershire Landscape Character Assessment SPD (Revised and Adopted November 2014). Under Key Characteristics (page 69) (CD4.3), the Wickwar Ridge is noted as forming a distinctive landscape feature in views and accommodating expansive westward views across the landscape to the north of Yate. This landform facilitates wide, long-distance views across the site from the undeveloped frontage of Sodbury Road (e.g., in the vicinity of LVA Viewpoint 2), which take in the

rural agricultural landscape of both the ridge and Yate Vale towards the Severn Ridges landform on the distant skyline, which is crossed by the M5 motorway.

- 2.10 The Landscape Strategy for LCA 5 is set out on page 79 of the LCA SPD, and I consider that the following two aims are particularly relevant to the site and its location within the landscape:

'... The extension of development, including for recreation outside existing settlement boundaries, requires sensitive treatment to ensure such changes are integrated within and absorbed into the wider landscape, and impact on any wider views from adjacent ridges is minimised. This is likely to require the provision of a robust framework of green infrastructure that picks up on the characteristic landscape features and framework of the surrounding area...

Ensure that new development respects and integrates with the historic pattern of the host landscape or settlement pattern and reinforces local distinctiveness through the use of appropriate building materials.'

My emphasis

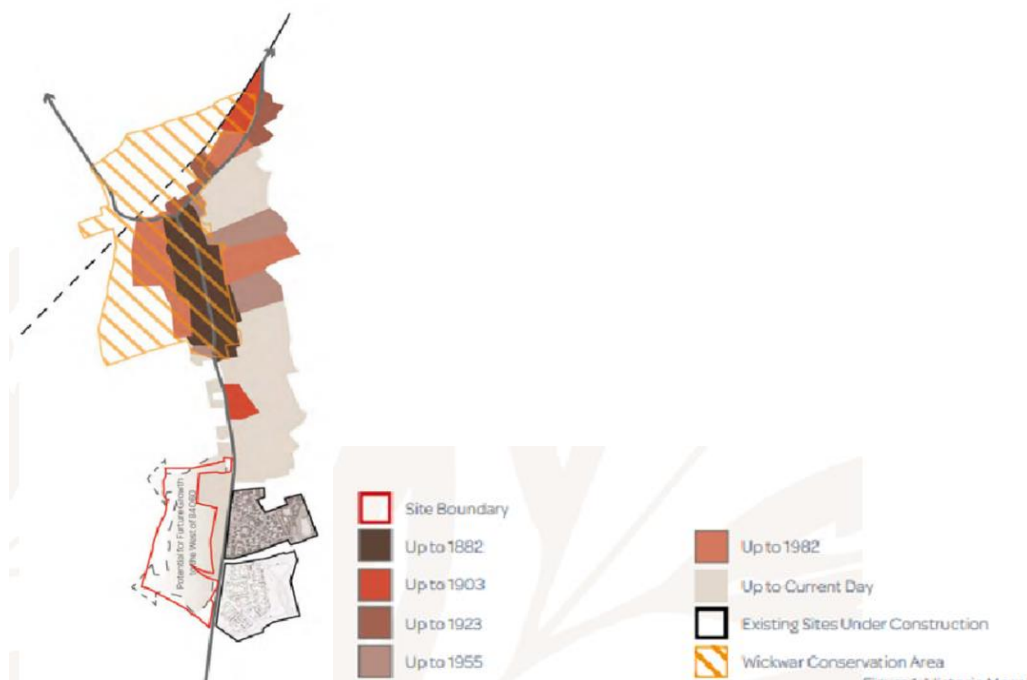
- 2.11 I consider that the Appeal proposals will not achieve either of these two landscape strategy objectives, in that the location, scale and massing of the scheme does not respect the historic settlement pattern of Wickwar, and the lack of a sensitive and transitional edge treatment will result in the new housing not being successfully integrated into the host landscape, as I discuss further in Section 3.
- 2.12 Sodbury Road provides an attractive, largely hedge lined, rural approach into the southern part of Wickwar. Further north along the western edge of the road, where there are gaps between frontage properties, there is also visual permeability across the site, which contributes to the strong sense of 'transition' from the open rural landscape into the denser, historic village core. The open character of the site also 'balances' the enclosed 'built' western side of the road, providing a counterpoint to its suburban appearance. The TPO Willows, lying within the north east frontage of the site, form a local green landmark in views along the B4060.
- 2.13 The undeveloped character of the site also allows views from the eastern end of Frith Lane, where it approaches the junction with Sodbury Road (e.g., between LVA Viewpoints 2 and 4, including 13), towards the tower of the listed Church of the Holy Trinity, which forms a landmark on the skyline above intervening development and vegetation within the village core. The Cotswold Scarp with its monuments is also noticeable on the distant skyline behind the village. These views are particularly

noticeable in winter months and when the roadside hedgerows have been cyclically maintained at a lower growth height.

- 2.14 From the southern edge of the Conservation Area there are views back towards to Sodbury Road and Frith Lane, in which the site is seen as part of the wider agricultural landscape; for example, from Viewpoint 10, and along Footpath LWR/25 on rising ground to the west of LVA Viewpoint 9. The site also forms part of the green, agricultural midground in a sequence of views from the footpath network lying to the west of Sodbury Road, namely between LVA Viewpoints 1 to 8 and 5 to 7, which I discuss further in Section 3. The distinctive profile of the listed Frith Farmhouse forms a local landmark in many of these views.
- 2.15 Therefore, an intrinsic function of the site is the physical and visual connectivity it provides between the village and its landscape surroundings, which allows the observer an appreciation of the wider landscape setting of Wickwar and its character. Also, the site has strong perceptual and scenic value as an integral part of this rural landscape.

Settlement Pattern

- 2.16 As described in the Wickwar Conservation Area Advice Note SPD (CD4.6) (page 1), Wickwar has an essentially linear settlement form that extends southwards from the Conservation Area along the B4060 High Street/Sodbury Road, as shown on Figure 1: Historic Morphology Plan on page 18 of the Design and Access Statement, Revision B (December 2022) (CD2.2), an extract of which is presented as Diagram 2 below.



- 2.17 The built footprint of the village has noticeably expanded since the late 1970s with new development largely being concentrated along the eastern side of the B4060 to face out towards the Cotswold Scarp. In comparison, on the western side of the B4060, development is sparse immediately south of the historic core of the village consisting of a few individual properties. South of this 'gap', the established development pattern comprises a 'shallow' built plot depth, which includes several older properties such as the listed South Farm. As described by the Heritage witness, Mr Robert Nicholson, South Farm is of historic interest and contributes to the character of the Sodbury Road frontage.
- 2.18 The intermittent development along the western side of Sodbury Road, within the vicinity of the site, includes from north to south:
- South Farm, which comprises a complex of large cattle barns lying behind the listed farmhouse; associated cattle currently graze the surrounding fields;
 - the low stone wall running along the site frontage in front of the TPO Willows, which forms a continuation of the boundary wall to the listed farmhouse;
 - a 'loose' grouping of properties with large gardens and adjoining small paddocks, which have well vegetated boundaries;
 - a liner grouping of 2 storey dwellings, at the southern end lies a builder's merchants (Country Style Supplies Ltd) and a bungalow; and
 - a barn and small stable block, which are set back from the road frontage to lie opposite No. 1 Frith Lane, on the northside of the lane.
- 2.19 The Conservation Area Advice Note SPD (CD4.6), on page 7 comments on the late C.20 development within Wickwar, as follows:
- 'New development on edges of the historic village core and on approaches to the village has resulted in a loss of views and appreciation of the surrounding landscape setting. The harmful impact could be reduced by better landscaping, boundary treatment and sensitive management to preserve a sharp, but green village edge.'*
- 2.20 I note that the Conservation Area SPD is concerned about the loss of views and appreciation of the surrounding landscape setting of the village and advises that any new development should seek to avoid such harmful effects and incorporate appropriate landscape mitigation.
- 2.21 Since the adoption of the Conservation Area SPD in October 1998, further development and resulting encroachment into the landscape has occurred along the eastern side of Sodbury Road, opposite the site, as shown on Diagram 3 below.



Diagram 3: Extract of Committee plan showing relationship of site to recent housing on eastern side of Sodbury Road

- 2.22 The development known as Tyndale Reach, which was consented under PK16/4006/O and PK17/5966/RM with conditions (for up to 80 houses), lies opposite the central part of the site and includes a proportionally large, multi-functional area of public open space along its eastern interface with the adjoining countryside, as shown on Diagram 3 above.
- 2.23 The development known as Saxon Gate extends between Horwood Lane and Pincots Lane, opposite the southern site area, and was consented under PK17/4552/O and P19/5258/RM with conditions (for up to 90 dwellings) and includes a landscape buffer with significant areas of screen planting along both its outer western and southern perimeters, which has been largely implemented.
- 2.24 I acknowledge that this recent, southerly expansion of the village has had an impact on both the character of Wickwar and the surrounding landscape. However, neither Tyndale Reach and Saxon Gate have respected and maintained the established development pattern along the western side of the B4060 and have not physically 'breached' it, or severed the existing physical and visual connectivity of this southern approach route from the landscape lying to the west of Wickwar. Although this recent housing is visible in views back towards the B4060 from the footpath network lying to

the west of the site, it is seen set back behind the road frontage together with the older properties and their vegetated curtilages along the western side of the road.

2.25 I acknowledge that these two recent, eastern housing areas visually intrude into views along Sodbury Road, however, they have been designed with articulated development frontages that are set back from the road behind a mix of open space and car parking area, which in turn are screened by roadside hedge planting, as shown on the aerial base of Diagram 3 above. Importantly, this 'built' enclosure of the eastern side of Sodbury Road is currently balanced by the open, undeveloped land within the appeal site, which allows the relationship of the village to its landscape surroundings to still be appreciated.

2.26 Therefore, I conclude that both Tyndale Reach and Saxon Gate respect and comply with the aims of both the Landscape Character Assessment SPD and Conservation Area SPD, namely that they have:

- respected and maintained both the historic, and established settlement growth pattern of Wickwar,
- not obstructed the open westerly views from the B4060, where it runs along the top of the Wickwar Ridge, which is important to maintaining the balance between countryside and built form in the entrance towards the village; and
- incorporated a robust green infrastructure, with sensitive green edge treatments, to help mitigate the impact of the new housing on the surrounding area.

3.0 PROPOSED DEVELOPMENT & LANDSCAPE ISSUES

Landscape and Visual Issues Associated with the Appeal Proposals

- 3.1 The scheme submitted under outline planning application P22/01300/O is described as:
‘Erection of up to 180 dwellings, a local shop and associated infrastructure (Outline) with access to be determined; all other matters reserved.’
- 3.2 There was little material change between the original scheme proposals submitted in February 2022, and the revised proposals submitted in March 2023 with their relatively minor modifications. The proposed extent of the built footprint, and that of the associated landscape infrastructure remained largely unchanged.
- 3.3 I note that the scheme shown on illustrative Framework Masterplan 3001 Revision M (CD2.1), and Landscape Strategy Plan EDP 6190-d026 Revision A (CD2.8) were intended to show one way in which the Appellant considered the development could come forward on the site. However, for the reasons I describe below, the proposed approach for the development of the site did not demonstrate how the fundamental landscape and visual issues arising from the location, scale, and prominence of the proposed development could be overcome.

Built Projection into Open Countryside

- 3.4 I consider that the Appeal scheme forms a large, dominant, and awkward projection out into open countryside, to the west of Sodbury Road, which is at odds with the prevailing settlement pattern, for the following reasons:
- the ‘incomplete’ framework of low field hedgerows around the site boundaries is not sufficiently robust to visually ‘contain’ and integrate the appearance of the development in views across the landscape given a number of units will be 2.5 storey in height; and the southern part of the development has no defining physical boundary;
 - the proposed housing footprint will extend significantly further west than the shallow depth of development pattern that characterises the western side of Sodbury Road lying adjacent to the site;
 - the built footprint of the northern housing parcel projects well beyond that of the South Farm complex to its north-east; furthermore, it represents an ‘outlier’ development area as it does not readily join an existing built development frontage along Sodbury Road, but instead is offset from this housing by the intervening area of small fields and large rear gardens;

- the central housing parcel boundary is offset from the gardens of the properties fronting onto Sodbury Road by a narrow strip of land, which appears to have been transferred to the respective frontage ownerships, given, current planning applications P23/02389/F: Bramble Cottage No. 82 Sodbury Road and P23/02116/F: Tollgate Cottage seek to change agricultural land to domestic garden and residential amenity space respectively, and P23/02645/F: timber yard lying further south for change of use from agriculture to B2 and B8 usage; I further note LVA Addendum (CD2.7) Photo-viewpoint EDP3 describes this housing as *‘Existing properties sandwiched between Sodbury Road and the Site’s eastern edge’*;
- the large footprint of the southern housing parcel forms a significant westerly projection, its outer edge lying further west than that of the South Farm complex and adjoining development lying further north in the village, as shown on the aerial photographic base of the Framework Masterplan (CD2.1).

Inadequate Mitigation

- 3.5 I do not consider that the loss of openness and rural character of the site, with the development in place, can be mitigated given the scale of encroachment into open countryside that it represents. Even if I considered that the principle of the development of this site, as proposed, was acceptable, which I do not, it is my opinion that the proposed and achievable level of green infrastructure and landscape mitigation will not be:
- of sufficient in quantum or quality to off-set the impact of the scale and massing of the proposed development, given that much of the proposed housing will be up to 2.5 storeys in height (Ref. Illustrative parameter Plan: Building Heights -36021 (CD. 6.12); and
 - adequately integrate the presence of the new housing into its surroundings or soften its suburban appearance in views across the landscape.
- 3.6 The central and southern parts of the western open space corridor are physically dominated by the size of the three proposed attenuation basins (see Drainage Strategy on Sheets B05313-En- 505 Rev. P05 and 506 Rev. P04) (CD2.6). I note that the imposing size of the attenuation basins was an issue raised by the Design Review Panel in June 2022, together with the potentially adverse impact of associated cut and fill. I consider that the size of these basins will restrict the space available space for:
- a broad range of recreation usage; I note that the POS Officer (CD3.9) also shared my concerns on the quality of usable open space being provided; and
 - landscape buffers with belts of screen planting to help integrate the presence of the new housing in the landscape; the proposed mitigation planting is limited to some reinforcement of the western boundary hedge.

- 3.7 The proposed development edge treatment on the eastern side of the POS corridor, as illustrated on DAS Figure 30: Demonstration Layout (CD2.2), compounds the lack of adequate landscape mitigation provision. The western housing edge appears to mostly comprise built form, shared streets, and driveways with little space for structural tree and screen planting (Ref. Figure 24: Access and Movement, page 63), despite being promoted as 'green edge' zones on Figure 29: Character Areas Plan on page 71 of the DAS and described as such on page 78.
- 3.8 The proximity of the built housing edge to the southern site boundary also negates the inclusion of an appropriately planted landscape buffer and transitional edge treatment to the scheme; again, the proposed mitigation is largely restricted to reinforcement of the boundary hedgerow.
- 3.9 Consequently, I consider that the central and southern housing parcels will present a 'hard and uniform' development edge treatment in views from the footpath network lying to the west and south-west of the site, and in views from the south from Frith Lane and Sodbury Road.
- 3.10 The planning application was not accompanied by the requested schedule of typical tree and plant species to help demonstrate the quality and robustness of proposed mitigation planting. Any screen planting would need to combine a mix of taller size tree stock with swathes of faster growing native tree, understorey, and hedge species, for example. The inclusion of orchard trees, whilst welcomed, would not provide a very tall mitigation planting even after say 15 years growth.
- 3.11 Mown grass paths were proposed within the western POS area (Ref. Landscape Strategy Plan EDP 6190-d026 Rev. A) (CD2.8), which will not be durable or provide year-round easily accessible routes. This will further detract from the usable recreation value of the public open space area.

Precedent for Future Development

- 3.12 The development of the Appeal site will set a precedent for future housing, in terms of replicating the principle of building behind existing housing development fronting onto the B4060 (e.g., further north of South Farm); and also, extending the footprint of the village further westwards. In response to South Gloucestershire Council's 2022 Call for Sites, most the undeveloped land to the west of Sodbury Road extending between Frith Lane and the southern edge of the Conservation Area is being actively promoted for development.

- 3.13 The Flood Risk Assessment and Drainage Strategy (dated 08/10/21) (CD1.7) for the site, on the Executive Summary on page 3, describes *'the wider development area covering 38ha of greenfield land'*, and that the *'FRA has been produced for the proposed Phase 1 area, which comprises up to 180 residential units and a farm shop ...'*. This suggests that it is the Appellant's intent to ultimately secure an overall development area of some 4.5 times larger than the Appeal site (7.89ha) to the west of Sodbury Road.

Appreciation of Wickwar's Landscape Setting and Features

- 3.14 An Approach to Landscape Character Assessment (October 2014), Natural England, Foreword (CD14.13) considers landscape and setting on page 6, and states:
'Landscape reflects the relationship between people and place, and the part it plays in forming the setting to our everyday lives....'
- 3.15 As I discuss in more detail below, the Appeal proposals will significantly impact on the observer's appreciation of the wider landscape setting of Wickwar and its character.
- 3.16 The scheme will obstruct the westerly, panoramic views from the Sodbury Road, to sever the existing connection between the observer and surrounding rural countryside. Also, the proposed scheme will physically and visually enclose southern approach route into Wickwar along the B4060 Sodbury Road, and at the same time suburbanise the character of its western edge.
- 3.17 The physical form of the Appeal proposals will also obstruct the views of the Church of Holy Trinity from the eastern end of Frith Lane and substantially intrude into views of the church from further west of the lane. The church forms a historic landmark in the landscape, and loss of these views will diminish the observer's appreciation of Wickwar and its historic cores from the southern part of the village. Although two potential view corridors towards the listed church are shown within the northern part of the site on, Landscape Strategy Plan EDP 6190-d026 Revision A (CD2.8), the alignment of these appears to conflict with both the proposed built footprint of the scheme and new screen/structure planting, rather than being designed with as appropriate 'clear width' corridors.
- 3.18 Two of the six TPO willow trees will be lost to the development to accommodate the northern spine road entrance, which will appreciably impact upon this tree grouping as a local landmark in views along Sodbury Road. The removal of the trees will also open up views into the site, which will principally comprise those along a new access road. The presence of the new site access junction and associated loss of stone boundary wall will have a further negative impact on the existing character of the western B4060 road frontage.

- 3.19 The Appellant has now provided illustrative Framework Masterplan 3002 Rev. C (CD6.2), and Landscape Strategy Plan edp6190_d026b (CD6.7), which appear to concede that enhanced mitigation and screening would be required. Accordingly, further planting is shown immediately adjacent to sections of the western and southern boundary hedgerows, with the southern housing edge eased back to accommodate this. The revised proposal also includes the retention of a triangular shaped open area within the corner of the site by the road to reflect the presence of open space on the opposite side of Sodbury Road, within Saxon Gate. The proposed convenient store still presents a hard, built frontage.
- 3.20 The proposed internal footpath network has been also strengthened. Presumably the appellant owns, or has an option on, the land adjacent to the northwest corner of the site to deliver the proposed off-site footpath link.
- 3.21 The revised development approach shown on illustrative Framework Masterplan 3002 Rev. C, and Landscape Strategy Plan - d026b, still does not overcome my original objections to the scheme, namely that the Appeal proposals:
- will be too prominent, far too large, and represent over development within this part of the Wickwar Ridge landscape;
 - do not respond to, or respect, the local character of Wickwar;
 - will not provide a sufficient in quantum or quality of green infrastructure and landscape mitigation to off-set the impact of the scale and massing of the proposed development and will fail to provide an appropriate transition from new built development edge to rural countryside, or an acceptably designed new south-west settlement edge; and
 - will provide a poor recreational environment, with the western open space corridor dominated by the size of the proposed SuDS attenuation basins and 'hard' built appearance of the overlooking housing edges.

Framework Landscape and Ecology Management Plan (LEMP)

- 3.22 No framework LEMP was provided to support the outline application, as advised would be required as part of the feedback for the Screening Opinion in November 2021 (CD4.1) and reiterated in early consultation feedback for the outline application. Framework LEMPs are requested by the Council to ensure that all the long term, overarching management issues are agreed in principle prior to determination, with the agreed LEMP then acting as a 'control' document for subsequent reserved matters and discharge of condition applications.

- 3.23 The South West Design Review Panel also advised in June 2022 that management of the site needed to be considered at an ‘early stage’.

Landscape and Visual Appraisal

- 3.24 The Landscape and Visual Baseline Assessment (LVA) dated February 2022 (CD1.11), at paragraph 4.22, assessed the overall landscape sensitivity of the site as being ‘medium’, and stated:
‘Overall, the site is considered to contain a number of locally valuable landscape features in good condition from a landscape perspective.’

- 3.25 Methodology table EDP A1.1 describes ‘medium’ sensitivity as:
‘Value: *Undesignated countryside and landscape features; some distinctive landscape characteristics; few landscape detractors.*
Susceptibility: *Some distinctive landscape elements/aesthetic/perceptual aspects; few landscape detractors; landscape receptors in fair condition. Landscape is able to accommodate some change as a result’.*

My emphasis

- 3.26 I note that the LVA methodology defines ‘medium sensitivity’ as being only able to accommodate ‘some change’. However, LVA paragraph 8.3 acknowledges that there would be a ‘fundamental change’ to the character of the site as a result of the proposed development; namely appreciably more than the ‘some change’ that site and its immediate surroundings has capacity to accommodate without an unacceptable level of harm. From my observations on site, and as described above, I agree that there will be a significant transformation of the site from greenfield land to largely built development of suburban character and consider that this change will be of ‘Very High’ magnitude. As the site forms an intrinsic part of the agricultural landscape lying to the west of Sodbury Road, I consider that there will be a similar level of magnitude on the local landscape area surrounding the site.
- 3.27 I consider that the Appeal proposals will have an adverse landscape effect of ‘Medium’ magnitude on the western part of LCA 5: Wickwar Ridges and Vale in which Wickwar and the site are located.
- 3.28 The original LVA (CD1.11) included a number of assessment viewpoints, as shown on the Diagram 4 below. The original viewpoints (e.g., 1 to 12 shown in blue) had not been agreed with the Council as requested in Screening Opinion feedback. Viewpoints 13 to 15 were added following my request for consideration of an additional six locations.

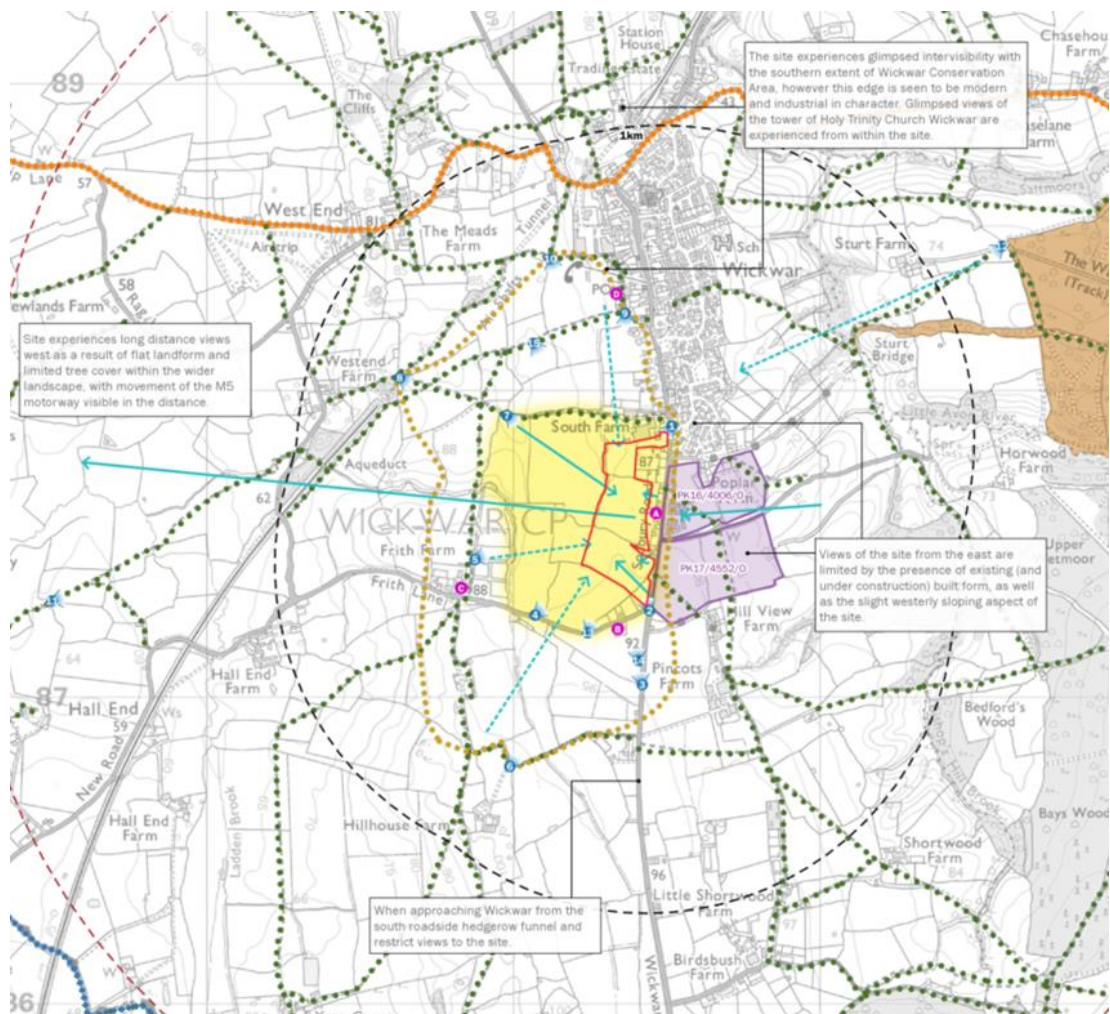


Diagram 4: Extract from LVA EDP Plan 3: viewpoint locations.

3.29 I consider that LVA Addendum (February 2023) (CD2.7) EDP Plan 3 is misleading in that it does not:

- show the Zone of Primary Visibility (ZPV) taking in all the viewpoints from where there will be notable views into the site, and corresponding clear views of the new housing, namely a series of sequential views from:
 - the sections of public footpath within the south-west part of the Conservation Area (e.g., LVA Viewpoints 9, 10 and 15),
 - along the footpath to the west of Viewpoint 7, or
 - the footpath lying either side of Viewpoint 5; I note that the site can be also seen from land adjoining the listed Frith Farmhouse; and
- show the available long-distance views from the open frontage of Sodbury Road, across the southern part of the site, which should be denoted by a long blue arrow/view line like that from the rear of properties lying further north along the road.

3.30 My assessment of the adverse visual effects of the Appeal proposals on the views from fifteen LVA viewpoints is set out in the Landscape Statement of Common Ground.

- 3.31 Diagram 5 below is a further extract from LVA Plan 3, on which I have annotated additional viewpoint locations, which I consider better illustrate the visibility of the site in views from part of the overlooking footpath network, together with its landscape context.

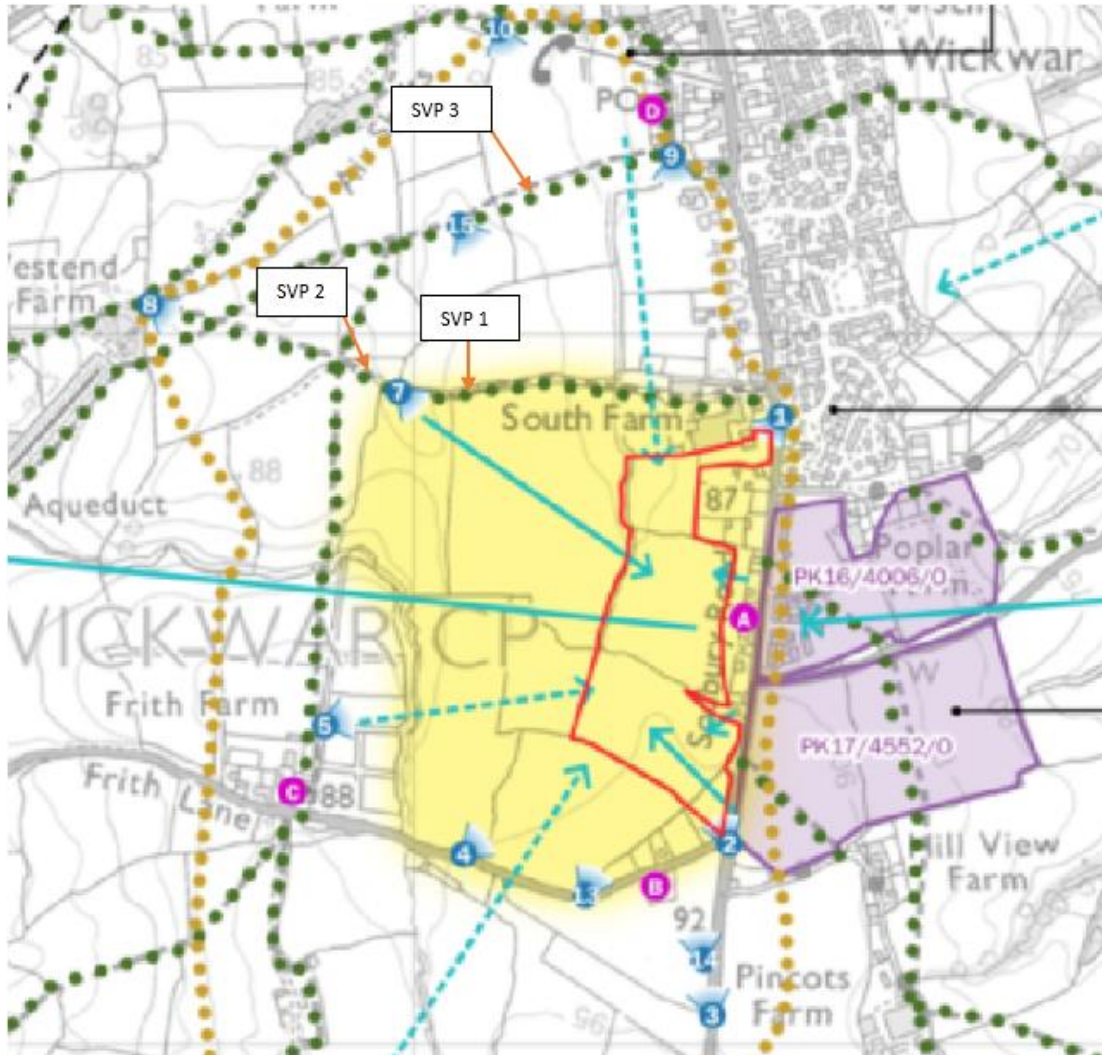


Diagram 5: Location of additional Council viewpoints

- 3.32 I describe the views from my three additional viewpoints with reference to illustrative photographs. These are not presented in accordance with Landscape Institute Technical Guidance Note 06/09, but instead are intended to demonstrate the availability and breadth of views that should be further considered on site.
- 3.33 It is also noticeable on site, that once away from the noise and everyday activity along the Sodbury Road there is a strong sense of tranquillity as the observer walks the rural footpath network between the Conservation Area and Frith Farmhouse.

- 3.34 SVP 1 lies on public footpath LWR/23/30 to the east of LVA Viewpoint 7. As shown by the illustrative panorama photograph below, the site is prominent in the mid-ground of the view. I consider that the proposed housing scheme will be significantly more intrusive than the existing housing lining both sides of Sodbury Road as it will lie much closer to the observer and will form a prominent westerly extension.
- 3.35 The panorama also shows how the proposed development will encroach into the wider rural farmland setting of Frith Farmhouse as the observer takes in the more north westerly view from the footpath.



Illustrative photograph (panorama) to show the view looking south-east and south from SVP 1 location towards the site and Frith Farmhouse.

- 3.36 SVP 2 lies to the west of LVA Viewpoint 7 along public footpath LWR/23/30 on slightly higher ground and facilitates a more open and elevated view into the site, as shown by the illustrative photograph below. The new housing development will be seen stretching across much of the mid-ground between the barn at South Farm and No. 1 Frith Lane. The new development edge will lie much closer to the observer than the existing housing and will represent a noticeably more dominant element in the composition of the view, to significantly encroach into the rural character of the landscape to the west of Sodbury Road.
- 3.37 The panorama also shows the wider view of the site's landscape context, which is typically available from this footpath route, unlike LVA Viewpoint photograph 7.



Illustrative photograph (panorama) to show the view looking south-east from SVP 2 location towards the site.

- 3.38 SVP 3 lies on public footpath LYA/11/10 on rising ground to the west LVA Viewpoint 9, as the route approaches the Royal Observer Corp Volunteer pill box and provides a notably clearer view into the site than Viewpoint 9, and a closer view than that from LVA Viewpoint 10, as shown by the illustrative photograph below. This footpath route is well used and allows an appreciation of the pastoral farmland setting of both the village and its Conservation Area.
- 3.39 I note that the recent housing along the east side of Sodbury Road is less visible from the southern margin of the Conservation Area, than other assessment viewpoints due to intervening field vegetation and the screening effect of existing housing along the western side of the road. The new housing development will be seen 'rolling down', the sloping landform of the site, and projecting out into the countryside, with the height of its built form replacing much of the vegetated skyline of the view between the barn at South Farm and No. 1 Frith Lane. If the observer turns 180 degrees, they can also see view the listed church on the skyline behind them.
- 3.40 There is a strong sense of intervisibility between the south-west edge of the Conservation Area and the site.



Illustrative photograph south from SVP 3 location towards the site.

3.41 In my opinion, the LVA fails to appropriately acknowledge the site's contribution in facilitating open views across the rural landscape, which is an essential part of how people experience Wickwar's landscape setting; or the prominence of the proposed development in these views, namely from:

- the undeveloped frontage of Sodbury Road;
- the eastern end of Frith Lane;
- the footpath network lying to the west of Sodbury Road; and
- the south-west edge of the Conservation Area.

4.0 PUTATIVE REASONS FOR REFUSAL

Putative Reason for Refusal 1

- 4.1 Following submission of the appeal for non-determination, the Strategic Sites Delivery Committee resolved on 3 August 2023 that should Members have been able to determine the application, it would have been refused. The Spatial Planning Committee on 8 August 2023 agreed with this refusal. Putative Reason for Refusal 1 cites several issues relating to the Appeal Site, which include:

*‘The adverse impacts of the proposal with regards to ...
Landscape Harm – significant weight...’*

- 4.2 In my evidence below I shall consider the related landscape and visual issues with reference to national and Local Plan policy, including the effect of the Appeal proposals on the character and appearance of the landscape area around Wickwar.

National Policy Planning Framework (NPPF) 5 September 2023 (CD4.7)

- 4.3 With reference to NPPF Section 15: Conserving and enhancing the natural environment, I acknowledge that the site is not covered by any national landscape designation or forms part of a previously identified ‘valued landscape’.
- 4.4 However, with reference to NPPF para. 174 (b), I consider that the site, and surrounding countryside area to the west of Sodbury Road, has intrinsic value in that it functions to provide physical and visual connectivity between the village and its rural landscape setting, and forms an important part of the character of this setting. In particular, the southern site area positively contributes to the retention of an attractive rural approach into the village along the B4060 Sodbury Road and contributes to the strong sense of transition along the road from open agricultural countryside to the densely built, historic village core of Wickwar. The green, open character of the site also ‘balances’ the built enclosure of the opposite, eastern side of the B4060.

SG Core Strategy (Adopted December 2013) (CD4.4)

- 4.5 Policy CS1: High Quality Design requires development proposals to demonstrate that:
‘1. Siting, form, scale, height, massing, detailing, colour and materials, are informed by, respect and enhance the character, distinctiveness and amenity of both the site and its context;’

3. existing features of landscape, nature conservation, heritage or amenity value and public rights of way, are safeguarded and enhanced through incorporation into development; and

4. if the proposed scheme is of a sufficient scale or significance, explain how the development contributes towards the vision and strategic objectives of the locality and (as appropriate) how account has been taken of:

- *Green Infrastructure objectives*
- *the South Gloucestershire Landscape Character Assessment (2005).'*

4.6 I consider that this site is unsuitable for the scale and form of development proposed. Whilst detailed landscape design is one of the matters reserved for future consideration at a later stage, it is still necessary to consider whether the Appeal proposals are acceptable in principle and whether the proposed development safeguards and enhances the character, attributes, and appearance of the receiving landscape. As set out in Section 3 of my evidence, I do not consider this to be the case.

4.7 In addition, a scheme of up to 180 dwellings within the 7.89ha Appeal site would represent slightly more housing development than the combined 170 dwellings consented at Tyndale Reach and Saxon Gate on the opposite, eastern side of Sodbury Road. Both these developments included proportionally more well-designed open space, green infrastructure and structure planting to help them be assimilated into the surrounding landscape, namely:

- Tyndale Reach – 4.3ha site size, with 2.1ha (48%) green infrastructure provision (Ref. Committee report for PK16/4006/O, dated 15 December 2016, para. 12).
- Saxon Gate, at the southern edge of Wickwar – 5.83ha site size, with 3.26ha (55%) green infrastructure provision (Ref. Committee report for PK17/4552/O, dated 3 May 2018, para. 12).
- Appeal Site – 7.89ha, with 3.46ha (43%) of open space cited in the legend of Framework Masterplan Option 2.

4.8 Accordingly, even if I am wrong about the principle of development, I do not consider that the Appeal proposals comply with Policy CS1.

4.9 Policy CS2: Green Infrastructure requires development proposals to attain a number of GI related objectives, including:

2. delivering high quality multi-functional and connected open spaces (including Green and Blue Infrastructure) ...

5. conserving and enhancing landscape character, historical, natural, built, and cultural features

6. securing ongoing management and maintenance and creation of GI assets...

The attainment of the above objectives should be addressed by development proposals and Local Plan Documents.'

- 4.10 Supporting, explanatory paragraph 5.26 goes on to states:
'Green Infrastructure provides a means to improve landscape quality and protect landscape features and views. GI offers opportunities to protect, increase access to and understanding of landscape, geology/geomorphology, historic sites, conservation area and heritage assets.'
- 4.11 I do not consider that the proposals will conserve or enhance the local landscape character around Wickwar, but instead will have a significant and detrimental impact upon it. The proposals will not preserve the long-standing historic relationship of the village to its wider landscape setting, but instead will obstruct the currently long-distance views available from Sodbury Road across this part of the Wickwar Ridge and Yate Vale towards the Severn Ridges on the western skyline. In addition, the proposed scheme will form an awkward and significant projection out into the open countryside in views from the north, west and south.
- 4.12 As I have described in Section 3, I consider that the internal layout and design of the scheme is poorly designed and does not incorporate a sufficiently robust landscape framework and green infrastructure. The proposed SuDS attenuation basins will dominate the proposed westerly open space corridor and restrict the available land for informal recreation opportunities to pathways around the perimeter of the basins. I note that the POS Officer (CD3.9) has also raised concerns regarding the effective area of usable and accessible open space. Also, the presence of these basins will preclude the inclusion of any significant landscape buffers with swathes/layers of mitigation planting, as incorporated within the two recent developments on the opposite, eastern side of Sodbury Road. The width of the green corridor space along the southern site boundary is similarly constrained by the proximity of the proposed housing edge.
- 4.13 The Appellant has provided no management plan framework document to demonstrate how the long-term management of the site's existing landscape and ecological features, together with the new green infrastructure, will be secured.
- 4.14 The western slope of the Wickwar Ridge is defined as a Visually Important Hillside on the Policy CS2 Key-Strategic Green Infrastructure Network- Figure 1 and has been identified as an important green infrastructure asset within the current technical evidence base for the emerging new Local Plan. Therefore, its presence character within the landscape should be respected.

- 4.15 Accordingly, I do not consider that the appeal proposals comply with Policy CS2.
- 4.16 Policy CS9: Managing the Environment and Heritage seeks to:
'3. conserve and enhance the character, quality, distinctiveness, and amenity of the landscape...'
- 4.17 Policy CS34: Rural Areas also advises that development proposals should:
'1. protect, conserve, and enhance the rural areas' distinctive character, beauty, wildlife, landscape, biodiversity, and heritage...
3. protect the unique and valuable setting provided by the rural areas to the urban areas and other settlements in South Gloucestershire, which contributes to the district's distinctive sense of place and identity...'
- 4.18 In principle, I consider that the Appeal proposals represent a significant loss of greenfield land, and do not protect or respect the intrinsic character and function of the open agricultural landscape within which the site lies. Instead, the Appeal proposals would:
- represent a significant suburban expansion to Wickwar, and awkward south-westerly projection into open countryside, which would increase the prominence of Wickwar within the landscape;
 - be at odds with the established linear built form of the village along the B4060;
 - further suburbanise and enclose the southern approach into the village via Sodbury Road;
 - give rise to very notable change to the appearance of the rural countryside to the west of Sodbury Road in views from the south-west edge of the Conservation Area, the footpath network extending westward from South Farm and northwards from Frith Cottage, and in views from both Frith Lane and Sodbury Road;
 - erode retained visual and spatial connectivity of the village's to its rural landscape setting; and
 - fail to deliver a new and robust green edge treatment to the south-west margin of Wickwar, or provide an appropriate transition between built development edge and rural countryside.
- 4.19 Therefore, I conclude that the Appeal proposals are not compliant with either Policy CS9 or Policy CS34.

[Policies Sites & Places Plan \(Adopted November 2017\) \(CD4.5\)](#)

- 4.20 Policy PSP1: Local Distinctiveness requires development proposals to 'respond constructively' to the characteristics that make a positive contribution to the distinctiveness of the area/locality.

4.21 Policy PSP2: Landscape states:

'Landscape Protection and Enhancement

Development proposals will be acceptable where they conserve and where appropriate enhance the quality, amenity, distinctiveness, and special character of the landscape (defined by the Landscape Character Assessment). This includes, but is not limited to:

- *landscape attributes which define the inherent character of an area, such as: landscape patterns arising from roads, paths, hedges, waterways and buildings; designed and natural landscapes, which include elements of natural beauty, historical or cultural importance and ecological features;*
- *the tranquillity of a landscape, sense of place and setting;*
- *landscape features, such as trees, hedgerows, woodlands, views, banks, walls, ponds and waterways;*
- *distinctive or characteristic topography and landforms.*

Where development proposals would result in harm to the landscape, it must be clearly demonstrated that:

- *the proposal results in benefits that outweigh the harm; and*
- *any harm to the landscape is minimised and mitigated through the form of the development and where reasonable the provision of landscape enhancements.*

Landscape Design

Amenity space, hard and soft landscape works, and open space provision will be required to be of a high standard of design, appropriate to the use and character of the development and its location; and designed as an integral part of the development, incorporating existing landscape features where appropriate, for the benefit of the development proposal.

Landscape Management

Landscape features which contribute to landscape character, quality, amenity, or local distinctiveness are to be retained and protected, and along with new landscape features, managed in a manner which ensures their long-term health and viability'

- 4.22 As I have discussed above, I consider that the Appeal proposals do not comply with either Policy PS1 or Policy PSP2 in that they will not conserve or positively contribute to the distinctiveness of the local landscape and locality. Instead, the proposed scheme will significantly harm the local landscape and further erode the rural setting of Wickwar, and its physical, visual, and perceptual connectivity to the wider countryside. Current countryside views facilitated by open agricultural land within the site will not be preserved. I do not consider that the proposed scheme will deliver an acceptable transitional and green landscape buffer that will help integrate the new housing into its surroundings. The requested management plan framework document has not been submitted to demonstrate how the long-term management of the site will be secured.

- 4.23 Policy PSP3: Trees and Woodland states:
'Development proposals should minimise the loss of existing vegetation on a site that is important in terms of ecological, recreational, historical or landscape value...'
- 4.24 A third of the TPO Willow group will be lost to the development to accommodate the northern spine road entrance. This will significantly diminish the amenity function and value of this tree group as a local green landmark in views along Sodbury Road as well as their contribution to the landscape setting of the listed farm. I agree with Tree Officer Consultation feedback (CD3.11 and CD3.12), that these trees should be preserved. Replacement trees in another location will not mitigate the loss of these road frontage trees.
- 4.25 The proposed northern access into the site will also remove a section of the stone boundary wall, which together with other frontage walling is a notable characteristic of this section of the B4060 and the Conservation Area lying further north. Loss of this wall alongside that of the TPO trees, together with the presence of the new site entrance junction, will impact on the character of the western road frontage of the B4060.
- 4.26 Therefore, I consider that the proposals do not comply with Policy PSP3.

5.0 SUMMARY AND CONCLUSIONS

5.1 I conclude that the location, scale, and massing of the proposed development, comprising the introduction of up to 180 dwellings and associated infrastructure on the Appeal site, will:

- significantly and detrimentally encroach into the countryside west of Wickwar, and will completely transform the open agricultural character of the site;
- appreciably project beyond the established built western edge and footprint of the village, and therefore, will not respect the historic development morphology of Wickwar or be in keeping with its built linear form along the B4060;
- replace the open character of the site, thereby replicating the built enclosure of the eastern side of the Sodbury Road, which will result in a suburbanised southern approach into the village, as well as further eroding the relationship and connectivity of the village to its landscape surroundings,
- fail to conserve and enhance the distinctive character of the rural landscape lying to the west of Sodbury Road, and the contribution this area makes to the setting of the village;
- significantly impact upon existing views across the landscape, particularly the currently available long-distance, open views to the west from the Sodbury Road together with views back towards the village from the surrounding footpath network; and
- not incorporate, or deliver, a well-designed green infrastructure including appropriate, transitional edge treatments and green landscape buffers, which will allow any new housing to be satisfactorily assimilated into the local landscape.

5.2 For these reasons, and as a matter of principle, I consider that the Appeal proposals will have a significant adverse effect on the character and appearance of the area and that this adverse impact should attract significant weight in the planning balance.