Bristol City Council

Land at Broom Hill / Brislington Meadows, Broomhill Road, Brislington, Bristol

Proof of Evidence of
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APP/Z0116/W/22/3308537

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1.0 Introduction

1.1 Authorship

1.1.2 This Proof of Evidence addresses landscape issues in relation to proposed Brislington Meadows development. It has been prepared by me, Antonia Whatmore, Landscape Architect and Urban Designer for Bristol City Council.

1.2 Qualifications

1.2.1 I graduated from the University of Greenwich in 1994 with a Bachelor of Arts degree in Landscape Architecture (BA Hons) and a Diploma in Landscape Architecture (Dip LA) and have Master's Degree in Urban Design.

1.2.2 I have gained over 25 years of landscape architecture experience working in both the private and public sectors where I specialised in addressing landscape planning issues related to a wide range of development projects.

1.3 Standard declaration

1.3.1 The evidence which I have prepared and provide for this inquiry is true and has been prepared and I confirm that the opinions expressed are my true and professional opinions.

2.0 Scope of Evidence

2.1 Following determination by the Planning Committee, my statement will address the landscape aspects of the proposal in support of the 4th Deemed Reason for Refusal which states;

The proposed development fails to adhere to the landscape and urban design policy considerations by virtue of excessive damage to the existing features on the site. The proposed plans and supporting documents present unsympathetic responses to the natural assets on the site and surrounding context and would prejudice the future design and delivery of an appropriate scheme. The proposal will fail to meet the requirements of the NPPF; policy BCS21 of the Core Strategy 2011; and policies SA1, DM26, DM27, DM28 and BSA1201 of the Site Allocations and Development Management Policies 2014.

2.3 The issues highlighted should be read in conjunction with evidence from the Mr Bhasin (Urban Design Officer) Mr Forbes-Laird (Arboriculture) and Mr Higgins (Ecology). Some overlap with others evidence is unavoidable. However, effort has been made to ensure the overlap is minimised and the evidence presents a complementary set of considerations from a landscape perspective.

2.4 I draw upon the information submitted for approval and supporting documents submitted as part of the planning application 22/01878/P. These include;

- CD1.5 Landscape Parameter Plan (LDA Design Drawing No. 7456_102)
- CD1.14 Design Code (LDA Design)
- CD1.20 Townscape and Visual Impact Assessment (LDA Design)
- *CD2.3 b)* Isopachtyes Plan Formation Against Topsoil Strip Tree Survey Overlay (Campbell Reith Drawing No. DR-C-5007-P1)
- *CD2.6 b)* Indicative Contour and Retaining Wall Plan (Campbell Reith Drawing No. DR-C-5001-P4)
- CD2.7 Applicant's response to the statutory consultation comments the Council's Landscape Team - *submitted to the Council 7 October 2022*
- CD8.18 Landscape Institute Technical Guidance Note 02/21 Assessing landscape value outside national designations.

2.5 I first visited the site in 2019 when I was part of a small team working to produce a Capacity Study for the Bristol City Council Housing Delivery Department. The project involved identifying the site constraints to achieve a site layout appropriate to the context. This work was halted halfway through the process. In 2020 I acted as the Landscape Architect working with Nitin Bhasin advising the Development Management case officer at pre-application stage giving headline landscape issues included within Mr Bhasin comments. I provided detailed landscape comments on the outline application for the site.

2.6 I draw upon the landscape context/character, ecology, trees and historic natural features to demonstrate that contrary to the assertion made by the appellant that; '*There is no evidence from desk or field study to suggest that the townscape/landscape within the Site or its study area is of particular value',* the landscape has value in accordance with **'Technical Guidance Note 02/21 Assessing landscape value outside national designations'(CD8.18).**

3.0 Brislington Meadows site Context/ Landscape Value

3.1 Context

3.1.1 The site, prior to being an allocated site, was designated by Bristol City Council as a Site of Nature Conservation Interest (SNCI) in recognition of the ecological importance due to the combination of species-rich grassland, damp grassland and hedges that it supports, which together form a combination of habitats that is of nature conservation value in a city-wide context.

3.1.2 Part of the site in the northwest corner is designated as Important Open Space. The landscape surrounding the site is also designated as areas of Important Open Space with the landscape to the south additionally designated as Site of Nature Conservation Interest.

3.1.3 The site is made up of a collection of small-scale agricultural grassland fields with generous mature hedgerow boundaries which have remained largely unchanged since the 1840's field pattern. These hedgerows are Important hedgerows with associated veteran trees at least 250 years old as referenced in Mr Forbes-Laird and Mr Higgins proofs of evidence.

3.1.4 The site is a topographically steep green hillside. The north part of the site is a high point within the cityscape at approximately 60m AOD, which affords extensive views over the city and to Dundry Hill beyond.

3.1.5 The value of the biodiversity, hedgerows, trees, landform and historic field pattern are features that inform the landscape value as outlined in the section below.

3.1.6 The site hosts two Public Rights of Way, PRoW BCC 482/20 crosses the site providing a link between Bonville Road and the Brislington Trading Estate to the east and School Road to the west via the Allotments. The second footpath, BCC/478/10, crosses the north-eastern corner of the site and links Bonville Road and the Brislington Trading Estate and the residential dwellings at Belroyal Avenue.

3.2 Landscape Value

3.2.1 The definition of landscape value has been assessed using the methodology set out in **'Technical Guidance Note 02/21 Assessing landscape value outside national designations' (CD8.18)**. It is compatible with GLIVA edition 3 definition of landscape value as well as Natural England's definition.

3.2.2 GLVIA edition 3 recognises that landscape value is not always signified by designation: 'the fact that an area of landscape is not designated either nationally or locally does not mean that it does not have any value' (paragraph **5.26**).

3.2.3 In accordance with the technical guidance note (TGN) the site is assessed to have six of the eight factors that determine this site is a valued landscape, see **Fig 1.** below. The table includes the column defining the factors, examples of the indicator of landscape value and the evidence to support the assessment.

Factor	Definition	Example of indicators of landscape value	Examples of evidence
Natural Heritage	Landscape has clear evidence of ecological, interest which contribute	Presence of wildlife and habitats of ecological interest that contribute to sense of place	Habitat surveys

	positively to the landscape		
Cultural heritage	Landscape with clear evidence of historical interest which contribute positively to the landscape	Landscape which offers a dimension of time depth. This includes natural time depth, e.g. historic field patterns,	Historic maps
Landscape condition	Landscape which is in a good physical state both with regard to individual elements and overall landscape structure	Strong landscape structure (e.g. intact historic field patterns)	Hedgerow/ tree surveys
Distinctiveness	Landscape that has a strong sense of identity	Presence of rare or unusual features, especially those that help to confer a strong sense of place or identity e.g. historical field pattern	Observations about identity/ distinctiveness
Perceptual (Scenic)	Landscape that appeals to the senses, primarily the visual sense	Distinctive features, or distinctive combinations of features, such as dramatic or striking landform and distinctive views	Observations about scenic qualities
Functional	Landscape which performs a clearly identifiable and	Areas that form an important part of a multifunctional Green	Site allocation design considerations

	valuable function	Infrastructure network	

Fig 1. Shows the six factors that determine the site has landscape value.

3.2.4 Assessing the site in accordance with the **'Technical Guidance Note 02/21 Assessing landscape value outside national designations'(CD8.18),** the combination of the character attributes that combine to give the landscape value are; the landform that affords city wide views, the existing Important Hedgerows with associated veteran trees, the historic field pattern of cultural and ecological significance.

3.2.5 Given the landscape value the Landscape Sensitivity will be increased as a measure of the resilience, or robustness, of a landscape to withstand specified change arising from the proposed development. These issues are cover in detail in **Sections 7 -10.**

4.0 Relevant Planning Policy context, Statutory considerations and National Guidance

4.1 National Guidance

4.1.1 Paragraph Section 174 of the NPPF applies, it states;

'Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils

(in a manner commensurate with their statutory status or identified quality in the development plan);'.

4.2 Local Planning Policy

4.2.1 Relevant to landscape, the Local Plan comprises the Bristol Development Framework Core Strategy (2011) includes;

4.2.2 Policy BCS9 which states;

'Individual green assets should be retained wherever possible and integrated into new development.'

And Policy BCS21 which states;

'New development in Bristol should deliver high quality urban design. Development in Bristol will be expected to:

Contribute positively to an area's character and identity, creating or reinforcing local distinctiveness.'

4.2.3 Relevant to landscape, the Site Allocations and Development Management Policies includes;

4.2.4 Policy DM15 Green Infrastructure Provision which states;

*'**Multifunctional Green Infrastructure Assets***

New green infrastructure assets will be expected to be designed and located to maximise the range of green infrastructure functions and benefits achieved, wherever practicable and viable.

Strategic Green Infrastructure Network

New or enhanced green infrastructure assets will be expected to take any reasonable opportunities to connect to, or enhance, the existing Strategic Green Infrastructure Network.'

'Where new open space for recreation is created as part of a development, it will be expected to:

i. Be appropriately designed to be safe, usable, integrated into the development site and maximise green infrastructure benefits and functions;'

4.2.5 Policy DM26 Local Character and Distinctiveness which states;

'The design of development proposals will be expected to contribute towards local character and distinctiveness by:

i. Responding appropriately to and incorporating existing land forms, green infrastructure assets and historic assets and features; and

4.2.6 Policy DM 27 Layout and Form within the Landscape section states:

Proposals for the landscape design and planting of development will be expected to:

ii. Allow sufficient space for safeguarding valuable existing vegetation and the healthy establishment of trees and other planting.

5.0 The Site Allocation BSA1201 development considerations

5.1 The site is an undeveloped parcel of land in a suburban location. The site is allocated for development under the allocation policy SA1 ref. BSA1201. I rely upon the evidence from Mr Collins in relation to planning policy considerations for the appeal.

6.0 Proof Structure related to the four key landscape issues

6.1 The four key landscape issues relate to the assessment of the development proposals from a landscape perspective and their appropriateness to the landscape value and context. These are:

1. The Quantum of Hedgerows proposed to be removed.
2. Landscape character impact of the SUDs feature, set out in the Design Code (LDA Design) (CD1.14) principles;
3. Compliance with Site Allocation BSA1201 design consideration **'***provide a green infrastructure link with Eastwood Farm Open Space to the north-east;'* alongside the amenity space and movement infrastructure proposed.
4. Earthworks proposals.

7.0 Landscape issue 1 - The Quantum of Hedgerows proposed to be removed.

7.1 The principle set out in the **Design Code (CD1.14)** page 11 is to **'retain and enhance existing green corridors'**. This approach is

supported and is in accord with the Site Allocation design considerations which states:

'retain or incorporate important trees and hedgerows within the development which will be identified by a tree survey'.

7.2 However, the proposals fail to deliver the described Design Code principle. The proposals involve the removal of the whole of H4a, H4b and H2 and parts of H1c and H3a as shown on drawing number G7507.20.012 **"Habitat Condition Assessment (applying Natural England Biodiversity Metric 3.0 Technical Guidance) (CD1.21e).** This equates to 74% of the existing hedgerows (as stated in the Landscape rebuttal comments from the applicant (CD2.7). These hedgerows are Important Hedgerows with associated trees and some veteran trees as covered by Mr Forbes-Laird. Additionally, the hedgerows act as ecological corridors as referenced in Section 3.1 of Mr Higgins Proof of evidence.

7.3 The **Isopachtyes Plan Formation Against Topsoil Strip Tree Survey Overlay (*CD2.3)*** shows that further hedgerow and veteran tree loss is likely due to the:

- Proposed earthworks close to the retained hedges along the northern boundary. This drawing proposes removing up to 0.5m of soil along the boundary. As the majority of the roots are within the top 0.25m of the topsoil this would undermine the roots and likely

kill the hedgerow removing this ecological corridor and visually prominent landscape feature on the topographically high part of the site.

- Tracking of vehicles within root protection zone of; veteran tree T6 and T5 to create the SUDs basins earthworks along the southern boundary and veteran tree VH2, VH7, VH8 and VH9 due to earthworks to create the north/south footpath. Veteran trees require greater root protection zones as covered by Mr Forbes-Laird in section 2.8.3 of his Proof of Evidence. Accordingly, the 74% hedgerow loss is the minimum.

7.4 Key among the hedgerows proposed for removal are the of two east/west hedgerows internal to the site, as shown on **Landscape Paramenter Plan Dwg No. 7456_102**, **(CD1.5)** supported by the information on the **Isopachtyes Plan Formation Against Topsoil Strip Tree Survey Overlay (*CD2.3)*** and **Proposed Contours and Retaining Wall Plan Drawing No.5001 (CD2.6 b)**.

7.5 The removal of such a large percentage of hedgerow including the loss of the two east/west hedgerows internal to the site alters the small scale 1840 historic field boundary pattern creating an open slope character. The hedgerow features form part of the rare and historic field pattern that help to confer a strong sense of place and landscape identity. These hedgerows are the characteristics/features

with historical, ecology and arboriculture importance that form the basis upon which the landscape value is derived. See **Fig 1**.

7.6 While the **TVIA (CD1.20)** acknowledges that the trees/hedgerows contribute to the key characteristics of the TCLA in Section 7.3.1 page 37. the baseline evidence for the TVIA states; 'There is no evidence..to suggest that the townscape/landscape within the Site or its study area is of particular value'. This fails to recognise the landscape Important Open Space designations of north/west part of the site and the surrounding landscape as well as the SNCI designation of the landscape to the south.

7.7 Further, the **TVIA (CD1.20)** assessment fails to acknowledge the hedgerows attributes are inherent in the landscape value. This flawed baseline leads to an underestimation of the landscape sensitivity and subsequent evaluation of harm.

7.8 Accordingly, the hedgerows should be retained or incorporated within the development. The introduction of new built form would be possible within the existing hedgerow structure with far less percentage loss of hedgerow and greater visual integration of built form into the landscape.

7.9 Therefore, the proposed design to approach runs contrary the stated design principles set out in the **Design Code (CD1.14)**, the site allocation design consideration and to Policy DM26 Local Character and Distinctiveness which states;

'The design of development proposals will be expected to contribute towards local character and distinctiveness by:

Responding appropriately to and incorporating existing land forms, green infrastructure assets and historic assets and features...'

7.10 Hedgerows Proposed to be Retained

7.11 The hedgerows proposed to be retained are limited to;

- site boundary hedgerows, as discussed above the quantum will be more than 74% due to the proposed earthworks;
- small sections of the central north/south hedgerow internal to the site and;
- fragments of an east/west hedgerow internal to the site.

7.12 The hedgerows internal to the site are poorly integrated with the proposed housing for the reasons set out below and fragmented to a point where they are no longer discernible as the key natural features within the site.

7.13 The retained east/west hedgerow fragment that falls within the **'Brislington Green'** character area as described in **Design Code**

(CD1.14) is incorporated centrally within an approximately 20m wide 'village green'. This hedgerow fragment is approximately 10m wide with an untidy informal field boundary hedgerow character with bramble edges see Fig 2.

Fig 2. Section of hedgerow to be retained and incorporated in the Brislington Green character area in accordance with the Design Codes.

7.14 The size and width of this informal hedgerow edged with bramble would dominate the 'Village Green' leaving only 5m strips either side for more formal landscaping compatible within the formal setting of the proposed more urban setting surrounded by houses. The size of the hedgerow would also prevent visual permeability of the space. Incorporating this hedgerow into this character area leaves it vulnerable to inappropriate management and formalisation better suited to the village green character with the removal of the bramble

and general tidying of the hedgerow more appropriate to the proposed setting.

7.15 The hedgerow fragments within the **'Brislington Green'** and **'The Gate'** character area as described in Design Code (CD1.14) are the only remaining retained east/west hedgerows internal to the site. It fails to create a green hedgerow continuum connecting with the small woodland on the north/west part of the site. The hedgerow is fragmented by the apartment block and roads to a point where is will no longer be discernible as a key natural feature.

7.16 The second of the two retained hedgerows internal to the site is incorporated into the **'The Gate'** character area of the **Design Code (CD1.14).** It is located on the eastern side of the main north-south footpath with the side elevation of the housing looking onto the space. This approach will create a footpath with poor natural surveillance due to the secondary side elevation of the houses edging the space and mature hedgerow obscuring visibility from the houses in the summer months. This approach is contrary to DM27 which states:

'The layout and form of development, including the size, shape, form and configuration of blocks and plots, will be expected to:

Enable active frontages to the public realm and natural surveillance over all publicly accessible spaces..'

7.17 Proposed Hedgerows

7.18 The Applicant's response to the statutory consultation comments of the Council's Landscape Team - *submitted to the Council 7 October 2022,* (CD2.7) states that the development will result in a total net increase of 725m of hedgerows within the site. However, insufficient information has been provided to assess whether this figure is deliverable. Where mitigation hedgerows/hedges are proposed within the appellant's **Design Code (CD1.14),** the majority are along built frontages. These hedgerows will be required to be planted with ornamental plants that reach a maximum height of 1-1.5m. This will not be mitigation of the native plants within existing hedgerows that grow too large to be planting as frontage garden hedging. Therefore, these hedges cannot be considered as mitigation for the native existing mature and ecologically rich hedgerow field boundaries.

8.0 Landscape issues 2 - Landscape character impact of the SUDs features, set out in the **Design Code (LDA Design) (CD1.14)** principle for a 'wetland meadow'.

8.1 Approval of the outline application includes approval of Design Code (LDA Design) (CD1.14) principle for the 'wetland meadow'. This principle is supported by more detailed information shown within **Isopachtyes Plan Formation Against Topsoil Strip Tree Survey Overlay (*CD2.3)*** and **Indicative Contour and Retaining Wall Plan (Campbell Reith Drawing No. DR-C-5001-P4 (*CD2.6 b)*** that shows a size and form of attenuation basins that are unacceptable for the reason detailed below.

8.2 The two SUDs attenuation basins located along the southern edge requires extensive earthworks to achieve the ponds. It is acknowledged the Flood Risk Officer is satisfied the SUDs basins perform to attenuation flood risk at this early design stage. However, from a Landscape perspective the proposals raise the following concerns;

a) The earthworks deliver an engineered uniform character that would permanently affect and be at odds with the natural consistence sloping landform from the northern boundary to the southern boundary. Detailed comments on the earthworks and impacts on the landscape character are set out in Section 8.3.

b) The SUDs basins replace the rare and valued existing grassland landscape (of nature conservation importance as described by Rupert Higgins) with a 'wetland meadow', as outlined as a Design Code (LDA

Design) (CD1.14). This would permanently destroy a large area of high quality grassland landscape.

c) Tracking of vehicles within root protection zones (particularly the veteran trees with require greater root protection zones as covered by Mr Forbes-Laird in section 2.8.3 of his Proof of Evidence) to create the attenuation basin banks would affect the of Veteran tree T6 and T5.

8.3 The supporting earthworks/reprofiling information shown in **Isopachtyes Plan Formation Against Topsoil Strip Tree Survey Overlay (*CD2.3)*** and **Indicative Contour and Retaining Wall Plan (Campbell Reith Drawing No. DR-C-5001-P4 (*CD2.6 b)*** underpins the Design Codes principles to create the 'Wetland Meadow' impacts the existing topography, lacking positive and sensitive integration of the development into existing landform for the reasons set out below;

a) The proposed earthworks deliver 1:3 banks to the ponds delivering an unnatural uniformity discordant with existing natural landscape and detrimental to the landscape character of the lower part of the site;

b) The steepness of the attenuation banks (1:3) limit the amenity value of the area as this gradient is uncomfortable for walking;

c) The earthworks are poorly integrated with the adjacent proposed housing. The proposed reprofiling delivers a retaining wall with

banking approximately 3m in height along the housing frontage to the western attenuation basin. This physically divorces the houses from the landscape preventing direct access between the houses to wetland meadow and creates an unnatural barrier in the landscape. See Appendix 1. This approach is this contrary to the character of the site and the Policy DM27: Layout and Form states:

'Through high quality landscape design, development will be expected to contribute to a sense of place with safe and usable outdoor spaces which are planned as an integral part of the development and respond to and reinforce the character of the context within which it is to be set.'

d) The banking earthworks adjacent to the Brook and the associated tree belt severs this landscape feature physically from the site lacking integration of this feature appropriately into the southern edge landscape strip.

8.4 In summary, while it is acknowledged that a SUDs approach is required for this site, the size of the basins needs to be reduced to avoid the issues raised and blended more appropriately to the existing landform. This can be achieved by reducing the developed area or employing a more bespoke approach to management of flood risk. The attenuation basins impacts the natural landform a characteristic feature that gives the site landscape value, in accordance with **'Technical Guidance Note 02/21 Assessing**

landscape value outside national designations' (CD8.18), affecting the landscape character with unnatural landforms which limit the amenity value of the space. Well-designed landscape areas should be integrated into the site physically, socially and visually, to create multi-functional green spaces. This approach would be more in keeping with the landscape context and deliver increased multifunctionally of this landscape area in accordance with Section 120 of the NPPF which states decisions should;

'recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production.

9.0 Landscape issues 3 - Compliance with Site Allocation design consideration '*provide a green infrastructure link with Eastwood Farm Open Space to the north-east;'* alongside the amenity space and movement infrastructure proposed.

9.1 The green infrastructure link with Eastwood Farm Open Space, a Site Allocation design consideration, is incorporated within the **Design Code (LDA Design) (CD1.14)** as a masterplan principle, described as 'Set homes within the landscape'. The Design Codes (CD1.14) Regulating Plan identifies this area as 'Bonville Glade'.

9.2 The apartment blocks within the 'Bonville Glade' character area are proposed to have footpaths and landscaping threading between the

apartment blocks with boundary treatment adjacent to the buildings. The limited space between the blocks to accommodate the car parks, boundary treatment, banking required to achieve the flat apartment block footprint, amenity and defensible space for residents is insufficient as shown on the **Indicative Contour and Retaining Wall Plan (Campbell Reith Drawing No. DR-C-5001-P4 (*CD2.6 b)***.

9.3 It should be noted that amenity and defensible space (a design requirement set out in the Design Codes) would have to be provided along the eastern side of the apartment blocks due to the limited space on the other three sides of the blocks as shown on the **Proposed Contours and Retaining Wall Plan (*CD2.6 b)***. This amenity space would encroach on the limited width of the ecology corridor exacerbating the concern raised by Mr Higgins in his Proof of Evidence.

9.4 It is a concern that the width of the landscape strip along the eastern edge of the site is insufficient to deliver an optimal open space for the public and an ecology corridor robust to human activity to perform multifunctionally. While this is an outline application, should this area of landscape prove too narrow in the later stage of the design process this could prejudice the landscape approach embedded in the Design Code as an approved principle.

9.5 The apartment blocks are arranged with fronts and backs facing publicly accessible car parking while the secondary side elevations are facing the road and the green space. This approach delivers buildings accessible by the public on three sides assuming the amenity and defensible space would be accommodated on the eastern side. Accordingly, the configuration fails to comply with DM27 which states;

'The layout and form of development, including the size, shape form and configuration of blocks and plots, will be expect to:

Create distinct public fronts and private backs with clear and obvious ownership and responsibility for external spaces provided..'

9.6 Additionally, the Design Codes principle locates the larger apartment buildings on the higher part of the site increasing the visual prominence within the landscape. The larger apartment buildings should be located on the lower slopes to reduce their visual prominence.

9.7 In summary if the masterplan principles 'Set homes within the landscape' is approved, compromises will be required at a later stage as the competing principles and objectives set out in the design code could be difficult to realise.

10.0 Landscape issues 4 - Earthworks proposals

10.1 Section 7 of the **Design Code (LDA Design) (CD1.14)** sets out the approach to setting the housing into the topography, supported by the information on the **Isopachtyes Plan Formation Against Topsoil Strip Tree Survey Overlay (*CD2.3)*** and **Indicative Contour and Retaining Wall Plan (Campbell Reith Drawing No. DR-C-5001-P4 (*CD2.6 b)***

10.2 Bristol has numerous examples of the distinctive approach to locating housing on visually prominent steep sites both historically and recent. This context includes terraces many utilizing a slit level house typology following the topography retaining the existing landform as much as possible. Thereby, designing out the need for retaining walls in landscaped areas. For example the houses in Cliftonwood area and more recently Bridge View at Novers Hill (application No.15/00545/F) and Kingwear project (application No.21/00824/FB). See Appendix 2 and 3 for the Design and Access Statements of these projects.

10.3 The approach to the site levels set out in Section 7 of the **Design Code (LDA Design) (CD1.14)** proposes a standard housing typology with single flat finish floor level using the sloping gardens and retaining walls to transition between the levels, (as illustrated on page 65 of the Design Codes).

10.4 To accommodate this standard housing typology the site is proposed to be reprofiled with substantial earthworks retaining walls and tanking to the building faces as shown in the **Isopachtyes Plan Formation Against Topsoil Strip Tree Survey Overlay (*CD2.3)*** and **Indicative Contour and Retaining Wall Plan (Campbell Reith Drawing No. DR-C-5001-P4 (*CD2.6 b)***

10.5 The extensive earthwork alters the landform for the majority of the site with only small areas around retained area of hedgerow remain without re-profiling, this impacts;

a) The character of the site defined by the topography;

b) The existing landscape structure of hedgerows and trees requiring removal of the majority of these features as commented on in an earlier section of this Proof of Evidence;

c) Raises the level along the northern boundary between .5-1m increasing the visual prominence of the housing in the highest part of the site;

d) Creates a bank with retaining wall edging the western SUDs attenuation basin resulting in houses which relate poorly to 'Wetland Meadow' and increasing the visual prominence of the houses from the green space. See Appendix 1;

e) Creates banks around the apartment blocks that will deliver poor outlook for some of the ground floor units as commented on in an earlier section of this Proof of Evidence;

f) Raises levels in the north-west area of the site, increasing the visual prominence of the housing on the highest part of the site from School Road;

e) Affects the usability the garden areas with:

- Privacy issues for the garden and internally to the houses from the houses on the upper levels looking down on the lower level housing. Where the ground slopes, an increase separation distance is required to take account of this issues.
- Overbearingly large retaining wall topped with boundary fence in the worse cases.

10.6 Accordingly, the wholesale reprofiling of the natural topography fails to comply with the National Design Guide, which states that development should;

'Understand and relate well to the site, its local and wider context. Well-designed new development responds positively to the features of the site itself and the surrounding context beyond the site boundary. It enhances positive qualities and improves negative ones. Some features are physical, including:

■ *landform, topography, geography and ground conditions;'*

And DM26 which states;

The design of development proposals will be expected to contribute towards local character and distinctiveness by:

i. Responding appropriately to and incorporating existing land forms, green infrastructure assets and historic assets and features.

10.7 Further, the landscape rebuttal states that. *'The indicative cut and fill modelling suggest a total cut of 27,000m3 and fill of 17,000m3 resulting in an overall surplus of soil material'.* Given the commitment, also within the rebuttal, that the overall surplus; *'Is anticipated to be re-used across the site within the development parcels to achieve a balance cut and fil in the final scheme.'* concern is raised that accommodating the additionally 17,000m3 of surplus fill material would potentially increase the comprises identified above.

10.8 To accommodate housing into this sloping site a bespoke housing typology would reduce the need for retaining walls reducing the requirement for the extensive reprofiling that impacts on the natural topography, soil structure and the landscape character.

11.0 Summary

11.1 The cumulative effects of the landscape proposals that removes the majority of the hedgerows impacting the historic field pattern

together with the whole sale reprofiling of the landform to accommodate the housing and SUDs attenuation basins damages this sensitive landscape. The development of such a historic and culturally important landscape should work with the natural assets, structuring the site to retain the existing landform and landscape features as far as possible.

11.2 The approach to this site should be landscape lead, by evaluation of the site's opportunities and embracing it's natural features. This approach achieves a better balance between the competing interests of; housing, green and movement infrastructure, whilst retaining the important fundamental landscape character. The European Landscape Convention P0F 1 P (ELC) states that we need to achieve 'sustainable development based on a balanced and harmonious relationship between social needs, economic activity and the environment'.

11.3 The current proposals are too heavily weighted towards accommodating housing and the associated infrastructure to the detriment of the landscape natural assets and character. As expressed in the 4th Deemed Reason for Refusal which states;

The proposed development fails to adhere to the landscape and urban design policy considerations by virtue of excessive damage to the existing features on the site. The proposed plans and

supporting documents present unsympathetic responses to the natural assets on the site and surrounding context and would prejudice the future design and delivery of an appropriate scheme. The proposal will fail to meet the requirements of the NPPF; policy BCS21 of the Core Strategy 2011; and policies SA1, DM26, DM27, DM28 and BSA1201 of the Site Allocations and Development Management Policies 2014.