




22nd December 2022

Mr David Millinship
Senior Planning Officer
Gloucester City Council
Shire Hall
Westgate Street
Gloucester
GL1 2TG

Shannon Way
Ashchurch
Tewkesbury
GKL20 8ND

 bromford.co.uk
 [@Bromford](https://twitter.com/Bromford)
 [/thisisbromford](https://www.facebook.com/thisisbromford)

Dear David

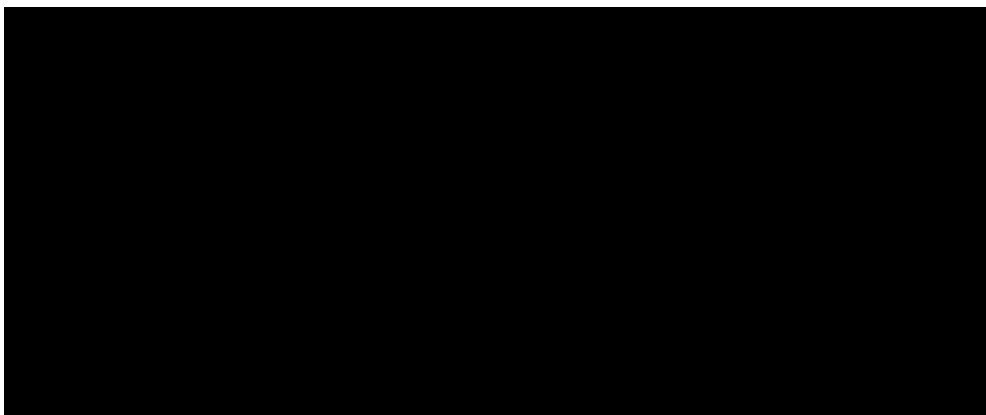
Land at Snow Capel, Winnycroft Lane, Matson
Planning reference: 22/00519/FUL

Thank you for working collaboratively with Bromford in respect of the above live planning application for land at Snow Capel, Matson. As I know you are aware Bromford has taken on board the planning consultee responses received, amended our proposals accordingly and submitted via our planning consultant, Black Box, updated proposals to you on Monday 19th December.

As set out in Black Box's covering letter, Bromford is proposing a minimum of 50% affordable housing and has been reviewing whether additional affordable housing can be provided. I am pleased to confirm that following this exercise Bromford can increase the percentage of affordable housing at Snow Capel up to 75%. We are currently working up a proposed tenure split and would welcome discussions with yourself and David Durden early in the new year to agree the details.

If you have any queries please do get in touch on the number below.

Yours sincerely



Our social value commitments for Snow Capel.

Bromford.



Environmental

Open spaces

Providing over 30,000m² of high quality open space for both new residents and the wider community

Connectivity

Improving connectivity links from Matson to the wider area by:

- Upgrading existing on-site footpaths
- Providing new off-site footpath connections in accordance with Gloucestershire County Council's connectivity objectives

Clean energy

Providing low carbon energy solutions to the new dwellings to both reduce carbon usage and residents energy bills. Electric vehicle charging points provided to all dwellings

Biodiversity

On site environmental enhancements will generate biodiversity net gain scores of:

- 17% improvement for habitats
- 31% improvement for hedgerows

Economic

Local Labour

10% of labour to be sourced locally

Local supply chain

10% of all materials supplied to site to be sourced locally

Apprenticeships

Commitment to fund and support a minimum of 4 apprenticeships

Work experience / careers

Collaborating with local schools & colleges - including Gloucester Academy - and attending careers fairs to help to support young local people into the jobs market

Construction Skills Certificate Scheme

Funding 50 local people to obtain their Construction Skills Certificate Scheme (CSCS) card to help them access opportunities to work in construction

Social

Providing 50% affordable housing

Providing 95 (50%) affordable homes - Bromford is therefore proposing an additional 57 affordable homes above current planning policy levels

Balanced and mixed communities

Delivering a balanced mix of homes of varied tenures - sale, social rent and shared ownership - and size to help meet local housing need. Bromford uses profits from private sale homes to fund further affordable housing

Supporting integrated communities

Working with the adjacent developers to help build the new community

Matson Regeneration Project

Providing accommodation for residents decanting from the Matson Regeneration project

Summary of our social value commitments for Snow Capel.

Bromford.

Bromford's commitment to social value

Bromford is a housing association operating across the Midlands and southwest. It owns and manages 43,000 homes and its purpose is to 'invest in homes and relationships so people can thrive'.

Bromford invests in communities in the long term and in addition to providing new homes it is also committed to delivering added value.

The Public Services (Social Value) Act 2012 requires Local Authorities to consider how procurement can improve the social, economic and environmental well-being of the relevant area.

Although the site at Snow Capel is not Local Authority owned, Bromford as an organisation is still committed to delivering added value.

Bromford wants to play its part in helping houses become homes; streets become communities and goals become realities.

So in addition to the proposed high-quality homes proposed at Snow Capel, Bromford is also proposing a package of social value commitments and this document sets out these proposals.

In the preparation of this social value proposal we have consulted various local partners including local councillors, the Gloucestershire Gateway Trust, the Matson, Robinswood and White City Community Partnership (MRWCCP), Gloucester City Council and Gloucester City Homes.

We will collaborate with partners to support new and existing projects with the objective of delivering specific measurable outcomes to help improve the social, economic and environmental well-being of Matson and Robinswood.

Gloucester City Social Value policy 2020-22

Social Value is defined by
The Social Value Portal as:

“An umbrella term for the wider economic, social, and environmental effects of an organisation’s activities. Organisations that make a conscious effort to ensure that these effects are positive can be seen as adding social value by contributing to the long-term wellbeing and resilience of individuals, communities and society in general.”

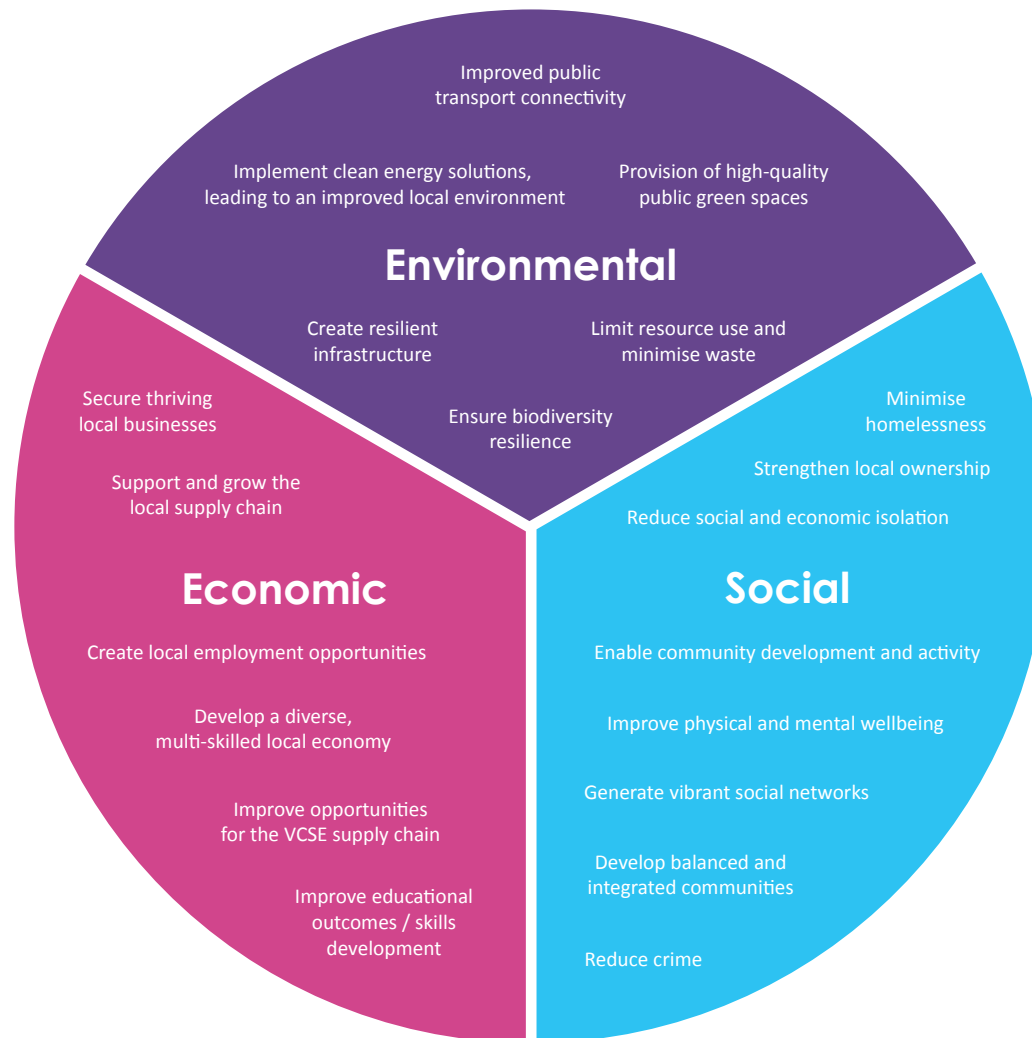
The city council has adopted a social value policy which acknowledges the significant contribution that developments, projects and organisations can make in terms of the positive social, economic and environmental effects on a community.

The policy sets out a desire to encourage proposals that deliver social value and states that:

“Gloucester still faces a number of challenges surrounding deprivation, with the City containing 9 of the 12 areas of Gloucestershire in the 10% most deprived areas nationally. Income deprivation, unemployment, lack of qualifications, health disabilities and crime are persistent concerns in certain wards of the City. Gloucester also has an uneven spread of these challenges, leaving some wards in greater need than others.”

The above quote highlights the need for social value investment in Matson and the following table, from the council’s social value policy, provides examples of how social value proposals can really benefit local communities:

Gloucester City Social Value policy 2020-22 continued



Matson and Robinswood

Matson itself dates from the early post war years when the City was building rapidly to replace bomb damaged stock and to rehouse inner-city residents displaced under slum clearance programmes.

The area has a high proportion of 1 and 2 bed flats and smaller family houses with a relatively high percentage of social rented homes.

The regeneration of Matson is supported by a Supplementary Planning Document – the Matson Estate Regeneration SPD Nov 2019 - which states that *‘whilst all of the affordable housing within the estate meets the decent homes standard, the quality of construction and design of the built environment reflect the estates age and offers a range of opportunities for improvement and improved quality of life, alongside opportunities for economic and social regeneration’.*

Within this SPD key regeneration priorities are:

- Providing homes to meet the needs of local people and of the wider city.
- Residents’ desires to remain in their community to be accommodated.
- Creating cleaner greener communities and improving the quality and use of open space.
- Improving connectivity and integration of Matson to the wider area.
- Improving social and economic opportunities for residents – as set out in ‘The Power of Three’ report.

The ‘Power of Three’ project, run by the Matson, Robinswood and White City Community Partnership (MRWCCP), has worked together to tackle the negative images of the Matson & Robinswood ward.

The report sets out the following priorities for the ward - adult skills and economic participation, climate change and 2050 zero carbon, renewal of the built environment, social imbalance, democratic participation and youth educational attainment.

Matson and Robinswood continued

Recent discussions with the Gloucestershire Gateway Trust have helped scope out how Bromford's proposed development at Snow Capel can contribute towards the above objectives and ensuring that as many local people as possible are connected to and benefit from the social, economic and environmental opportunities it will create.

Bromford will work with the Matson & Robinswood community with an asset or strength based approach, building upon the existing networks and strengths within the community to engage with residents and open up the opportunities created by this development to local people.

We have agreed that our social value commitments for Snow Capel will focus on:

- Providing significant levels of additional affordable housing.
- Providing energy efficient homes to help meet local housing need.
- Creating high quality open space for the benefit of the wider community.
- Improving connectivity from Matson to the wider area.
- Supporting local unemployed people to receive the skills, training and support to gain employment.
- Supporting local people into apprenticeships in the construction industry.
- Promoting opportunities to existing local construction businesses, SMEs and tradespeople.
- Promoting careers in construction and housing at local schools and colleges.

Bromford's package of Social Value commitments are set out in the tables on pages 9 to 11.

During the current cost of living crisis the delivery of this package of measures will have a beneficial positive environment, economic and social impact on Matson and Robinswood.

Resources, implementation, monitoring and outcomes

Bromford has the internal resources to support the delivery of our social value proposals for Snow Capel.

In addition to on site delivery teams, Bromford has a specialist apprenticeship team run by Sharon Carrington, our Apprentices and Graduate Lead.

Sharon's team manages the organisations existing apprenticeship programme and would support the delivery of our objectives at Snow Capel.

The benefits of apprenticeships are set out in this article:



Scan the QR code or visit:
www.bromford.co.uk/news/latest-news/2020/january/the-benefits-of-an-apprenticeship/

And here is a case study from Hannah Davies talking about her journey so far, as she works through a multi-skilled engineer apprenticeship at Bromford:



Scan the QR code or visit:
www.bromford.co.uk/news/latest-news/2021/february/my-apprenticeship-journey-so-far/

Bromford's corporate strategy includes a commitment to delivering apprenticeships across the organisation.

Our in-house apprenticeship team is currently supporting over fifty apprentices through the academic and work-based aspects of their apprenticeships.

The submission, implementation, monitoring, review and out-turn phases would be tracked using the nationally recognised National TOMs Framework spreadsheet.

Social Value Commitments

- in detail

Objective	Approach	
Environmental		
Open spaces	Providing high quality green spaces	Bromford's planning application includes over 30,000m2 of attractive open space centred around a moat which is designated as a scheduled monument (SM). The new development includes proposals intended to protect and enhance the heritage value of the moat. The open space would also be for the benefit of both new and existing Matson residents. The management of the SM and space around it will be the subject of a dedicated Conservation Management Plan. Along with the long-term management, it will also include delivery and management of educational aids, such as information boards, to better demonstrate and appreciate the history of the local heritage.
Connectivity	Improving connectivity links from Matson to the wider area	<p>The city council's public rights of way team have an objective to improve pedestrian and cycle links between Matson and Gloucester Services. Bromford's proposals for Snow Capel would significantly contribute towards this objective through:</p> <ul style="list-style-type: none"> • providing a new footpath connection from the site to Matson via Winnycroft Lane and connecting this link to a new footpath running along the full length of the western boundary of the Snow Capel site. • diverting and upgrading an existing footpath which would then connect the site to Matson via the Barratt Homes development to the north. <p>The new open space, pedestrian and cycle links would provide additional desirable and safe walking and cycling opportunities for the local community supporting health and well-being objectives for the area.</p>
Clean energy	Implementing clean energy solutions to help improve local environment	<p>Dwellings to be provided with increased insulation to improve U values and either PV solar panels or Air Source Heat Pumps to minimise carbon emissions. In the current energy crisis these measure will also help reduce residents heating bills.</p> <p>Electric vehicle charging points to be provided to all allocated parking.</p>
Biodiversity	Enhancing biodiversity	<p>A series of on-site biodiversity improvements are proposed including planting a wildflower meadow around the moat, retaining and infilling boundary habitats, providing bird and bat boxes and planting fruit bearing trees.</p> <p>These measures generate positive biodiversity net gain scores – a 17% increase in habitat units and a 31% increase in hedgerow units – which are both above the 10% threshold.</p>

Social Value Commitments

- in detail

Objective	Approach	
Economic		
Local Labour	10% of labour to be sourced locally	<p>This obligation will be fed down Bromford's supply chain through established contractual mechanisms with the following cascade approach to be adopted - 1) Matson and Robinswood ward 2) Gloucester City boundary 3) outside of Gloucester.</p> <p>We will work with local employment projects - such as ESHO or Restart - particularly those supporting people furthest from the labour market. We will collate and promote roles locally through community networks.</p>
Local supply chain	10% of all materials supplied to site to be sourced locally	We will engage with the local supply chain through 'meet the builder' events and direct contact. This will raise awareness of the opportunity within Gloucester and allow pre-tender connections with trades, local businesses, suppliers and SME's based on VFM assessment and the cascade as detailed above.
Apprenticeships	Commitment to fund and support apprenticeships	<p>Bromford's apprenticeship team has secured funding to support new apprenticeship opportunities at Snow Capel. These will be supported either directly, via subcontractors or through the supply chain following the cascade detailed above. The project would be delivered over a c4-year period, and during this time we will commit to supporting 4 apprentices through an apprenticeship programme.</p> <p>Bromford would work with Gloucestershire College and would follow the principles of the GEM project with the objective of attracting into apprenticeships young people and/or those most removed from the labour market.</p>
Work experience / careers in construction	Collaborating with local schools, colleges. Careers fairs.	<p>Collaborating with local schools and colleges to support young people into the jobs market, site safety and energy efficiency in construction. Supporting local careers fairs to advertise and promote vacancies.</p> <p>We will work with Gloucester Academy to promote our vacancy and apprenticeship opportunities. In addition we will look to inspire younger students to consider careers in construction on other Bromford pipeline developments to support the future sustainability of skills in construction.</p>
Construction Skills Certificate Scheme	Funding 50 local people to obtain CSCS cards.	Providing funding for up to 50no local people to obtain their CSCS card. Although not a legal requirement, in practice the CSCS card is required by most construction-based employers so obtaining a CSCS card is an important first step for people looking to work in construction.

Social Value Commitments

- in detail

Objective	Approach	
Social		
Providing 50% affordable housing	38 x s106 affordable homes (20%) and 57 x additional affordable homes (30%).	Bromford will provide 95no affordable homes contributing towards the historic under-provision of affordable housing in the city. 57no of these affordable houses will be additional i.e. over and above the policy requirement. As agreed with the Housing Projects and Strategy Team Leader, the 50% affordable housing will be a mix of social rent and shared ownership. Social rented homes are proposed as they are the most affordable rented tenure which is an important consideration during the current cost of living crisis. A mix of apartments and 2, 3 and 4 bed houses are proposed with the precise mix agreed to help meet local housing need. Larger family homes are under-represented in Matson so these units will help improve the balance of affordable homes in the area. Bromford is also offering in excess of policy level requirements for both M4 (2) accessible and M4 (3) wheelchair accessible homes.
Balanced and mixed communities	Delivering a mix of homes of varied sizes and tenures.	Bromford's proposal is to deliver 50% affordable housing to help create a balanced and sustainable community. A mix of apartments and 2, 3 & 4 bed houses are proposed to help meet housing need.
Supporting integrated communities	Helping to build a new community.	Working with Barratt Homes and the Little Winny developer to help build a new sustainable community. Scoping opportunities for collaborative working e.g. improving pedestrian and cycle links.
Matson Regeneration Project	Providing accommodation for residents decanting from the Matson Regeneration project.	Bromford has agreed to offer 30no affordable dwellings to provide temporary or longer-term accommodation to any residents decanting from properties in Matson as a result of the Matson Regeneration Project. Gloucester City Homes are currently scoping out regeneration options and, as set out in the SPD, decanting may be required due to either redevelopment or refurbishment improvements. As discussed with the Housing Projects and Strategy Team Leader, this would be dealt with, to secure the homes for this purpose, via a local lettings agreement.

19-026 Snow Capel, Matson

Bromford & EWH

09.12.22

0030 - Proposed Site Plan

<i>Original HT</i>	No.	Beds	Storey	sq.m	sq.ft	Total sq.m	Total sq.ft
<i>1Bed Flat (540) (Aprt A,B,E)</i>	16	1	F	50	540	803	8640
<i>1Bed Flat (701) (Aprt C,D)</i>	6	1	F	65	701	391	4206
<i>M4(3) Flat (701) (Aprt C,D)</i>	4	1	F	65	701	260	2804
<i>1bed Maisonette (625)</i>	3	1	2	58	625	174	1875
<i>2B3P (774)</i>	11	2	2	72	775	792	8524
<i>2B4P (855)</i>	42	2	2	79	855	3335	35896
<i>3B5P (886)</i>	10	3	2	82	886	823	8859
<i>3B5P (1010)</i>	9	3	2	94	1010	844	9087
<i>3B5P V1 (864)</i>	4	3	2	80	864	321	3457
<i>3B5P V1 (1019)</i>	20	3	2	95	1018	1892	20370
<i>3B5P V2 (1019)</i>	15	3	2	95	1018	1419	15277
<i>3B5P (1014)</i>	18	3	2	94	1014	1696	18251
<i>3B - M4(3) (1367)</i>	1	3	2	127	1367	127	1367
<i>4B7P (1109)</i>	3	4	2	103	1109	309	3327
<i>4B7P (1253)</i>	4	4	2	116	1253	466	5012
<i>4B8P V2 (1448)</i>	6	4	2	135	1448	807	8687
<i>4B7P (1316)</i>	11	4	3	122	1316	1345	14481
<i>4B8P (1357)</i>	7	4	2	126	1357	883	9501
Total	190					16687	179621
Net Area (ha/acre)- North						1.05	2.59
Net Area (ha/acre) - South						3.39	8.38
Net Area (ha/acre) - Total						4.44	10.97
Coverage						16372	sq.ft/acre
Density						43	dph

**PROPOSED RESIDENTIAL DEVELOPMENT
LAND AT SNOW CAPEL
GLOUCESTER**

NOISE IMPACT ASSESSMENT

Technical Report: R9061-1 Rev 4

Date: 15th December 2022

For: Bromford
1 Exchange Court
Brabourne Avenue
Wolverhampton Business Park
Wolverhampton
WV10 6AU

24 Acoustics Document Control Sheet

Project Title: Proposed Residential Development, Land at Snow Capel, Gloucester - Noise Impact Assessment

Report Ref: R9061-1 Rev 4

Date: 15th December 2022

	Name	Position	Signature	Date
Prepared by				15/12/2022
Reviewed & Approved by				15/12/2022
For and on behalf of 24 Acoustics Ltd				

Document Status and Approval Schedule

Revision	Description	Prepared By	Reviewed By	Approved By
0	Approved for Issue			
1	Update			
2	Update			
3	Layout Update			
4	Layout Update			

DISCLAIMER

This report was completed by 24 Acoustics Ltd on the basis of a defined programme of work and terms and conditions agreed with the Client. The report has been prepared with all reasonable skill, care and diligence within the terms of the Contract with the Client and taking into account the project objectives, the agreed scope of works, prevailing site conditions and the degree of resources allocated to the project.

24 Acoustics Ltd accepts no responsibility whatsoever, following the issue of the report, for any matters arising outside the agreed scope of the works.

This report is issued in confidence to the Client and 24 Acoustics Ltd has no responsibility of whatsoever nature to third parties to whom this report or any part thereof is made known. Any such party relies upon the report at their own risk.

Unless specifically assigned or transferred within the terms of the agreement, 24 Acoustics Ltd retains all copyright and other intellectual property rights, on and over the report and its contents.

© 24 Acoustics Ltd 2022

CONTENTS	PAGE
1.0 INTRODUCTION	4
2.0 SITE DESCRIPTION AND PROPOSED DEVELOPMENT	4
3.0 STANDARDS AND GUIDANCE	5
4.0 AMBIENT NOISE SURVEYS	9
5.0 ASSESSMENT	11
6.0 CONCLUSIONS	15
REFERENCES	16
FIGURES	17
APPENDIX A: NOISE UNITS	20
APPENDIX B: AMBIENT NOISE MEASUREMENT RESULTS	21

1.0 INTRODUCTION

- 1.1 24 Acoustics Ltd has been instructed by Bromford to undertake a noise impact assessment at a site known as Land at Snow Capel, Gloucester. It is proposed to develop the site for 190 dwellings.
- 1.2 This report has assessed noise from road traffic at the proposed development. The primary noise source in the area is road traffic on the M5 to the east and south and Winnycroft Lane to the west and south.
- 1.3 All noise levels in this report are quoted in dB relative to 20 μ Pa. A definition of noise parameters described in this report is provided in Appendix A.

2.0 SITE DESCRIPTION AND PROPOSED DEVELOPMENT

- 2.1 The site is located to the south of Gloucester and currently comprises farmland. Existing vehicular access to the site is located to the north, from Winnycroft Lane. The M5, which is the dominant noise source locally, is located on the south eastern boundary in a low cutting. Existing residential properties are located directly south of the site as well as to the west on Winnycroft Lane.
- 2.2 Planning consent is sought to construct 190 residential dwellings, comprising a mixture of terrace, detached and semi-detached houses as well as two story apartment blocks. A barrier topped bund is proposed to the eastern boundary, adjacent to the M5. Existing access from Winnycroft Lane will be retained.
- 2.3 The primary noise sources in the area include road traffic on the M5 and Winnycroft Lane. Therefore, this assessment considers noise impact from the surrounding road network, incident at the proposed development.
- 2.4 The site location is shown in Figure 1 with the site masterplan shown in Figure 2.

3.0 STANDARDS AND GUIDANCE

National Planning Policy

3.1 Paragraph 185 of the National Planning Policy Framework (NPPF) [Reference 1] states that planning policies and decisions should:

- mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;
- identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.

3.2 The NPPF also refers to the Noise Policy Statement for England (NPSE) [Reference 2] which is intended to apply to all forms of noise, including environmental noise, neighbour noise and neighbourhood noise. The NPSE sets out the Government’s long-term vision to ‘promote good health and a good quality of life through the effective management of noise within the context of Government policy on sustainable development’ which is supported by the following aims:

- Avoid significant adverse impacts on health and quality of life;
- Mitigate and minimise adverse impacts on health and quality of life;
- Where possible, contribute to the improvement of health and quality of life.

3.3 The NPSE defines the concept of a ‘significant observed adverse effect level’ (SOAEL) as ‘the level above which significant adverse effects on health and quality of life occur’. The following guidance is provided within the NPSE:

"It is not possible to have a single objective noise-based measure that defines SOAEL that is applicable to all sources of noise in all situations. Consequently, the SOAEL is likely to be different for different noise sources, for different receptors and at different times. It is acknowledged that further research is required to increase our understanding of what may constitute a significant adverse impact on health and quality of life from noise. However, not having specific SOAEL values in the NPSE provides the necessary policy flexibility until further evidence and suitable guidance is available."

- 3.4 The National Planning Practice Guidance (NPPG) [Reference 3] is written to support the NPPF with more specific planning guidance. The NPPG reflects the NPSE and states that noise needs to be considered when new developments may create additional noise and when new developments would be sensitive to the prevailing acoustic environment. It also states that opportunities should be taken, where practicable, to achieve improvements to the acoustic environment. The NPPG states that noise can over-ride other planning concerns but should not be considered in isolation from the other economic, social and environmental dimensions of the proposed development.
- 3.5 The NPPG expands upon the concept of SOAEL (together with Lowest Observable Adverse Effect Level, LOAEL, and No Observed Effect Level, NOEL) as introduced in the NPSE and provides a table of noise exposure hierarchy for use in noise impact assessments in the planning system. Table 1 is reproduced from the PPG and summarises the noise exposure hierarchy, based on the likely average response.

Perception	Examples of Outcomes	Increasing Effect Level	Action
Not noticeable	No Effect	No Observed Effect	No specific measures required
Noticeable and not intrusive	Noise can be heard, but does not cause any change in behaviour or attitude. Can slightly affect the acoustic character of the area but not such that there is a perceived change in the quality of life	No Observed Adverse Effect	No specific measures required
Lowest Observable Adverse Effect Level (LOAEL)			
Noticeable and intrusive	Noise can be heard and causes small changes in behaviour and/ or attitude, e.g. turning up volume of television; speaking more loudly; where there is no alternative ventilation, having to close windows for some of the time because of the noise. Potential for some reported sleep disturbance. Affects the acoustic character of the area such that there is a perceived change in the quality of life	Observed Adverse Effect	Mitigate and reduce to a minimum
Significant Observed Adverse Effect Level (SOAEL)			
Noticeable and disruptive	The noise causes a material change in behaviour and/ or attitude, e.g. avoiding certain activities during periods of intrusion; where there is no alternative ventilation, having to keep windows closed most of the time because of the noise. Potential for sleep disturbance resulting in difficulty in getting to sleep, premature awakening and difficulty in getting back to sleep. Quality of life diminished due to change in acoustic character of the area.	Significant Observed Adverse Effect	Avoid
Noticeable and very disruptive	Extension and regular changes in behaviour and/ or an inability to mitigate effect of noise leading to psychological stress or physiological effects, e.g. regular sleep deprivation/ awakening; loss of appetite, significant, medically definable harm, e.g. auditory and non auditory	Unacceptable Adverse Effect	Prevent

Table 1: PPG Noise Exposure Hierarchy

- 3.6 In general terms it is considered that a noise impact with an effects level which is lower than SOAEL is acceptable (providing the effect is mitigated to a minimum). There is currently, however, a discontinuity between the above guidance and objective technical criteria for use in planning noise impact assessments.

Internal Noise Levels

- 3.7 For residential developments 24 Acoustics considers that the spirit of the requirements of the NPPF, NPSE and PPG will be complied with if criteria from British Standard 8233:2014 [Reference 4] and World Health Organisation guidelines [Reference 5] are adopted for internal noise within dwellings.
- 3.8 BS 8233 provides desirable internal ambient noise levels for habitable rooms. Table 2 shows a summary of the levels recommended in BS 8233 for living rooms and bedrooms.

Activity	Location	Daytime 07:00 to 23:00	Night-time 23:00 to 07:00
Resting	Living Room	35 dB $L_{Aeq, 16 \text{ hour}}$	--
Sleeping (daytime resting)	Bedroom		30 dB $L_{Aeq, 8 \text{ hour}}$

Table 2: Indoor Ambient Noise Levels as Recommended in BS 8233

- 3.9 The World Health Organisation provides guidance on desirable internal noise levels to minimise the risk of sleep disturbance. The WHO guidelines suggest internal noise levels not exceeding 30 dB L_{Aeq} or regularly exceeding 45 dB $L_{Amax,f}$ for 'a good sleep'.

External Noise Levels

- 3.10 The World Health Organisation provides guidance on the relationship between annoyance and noise levels in external amenity areas (gardens, terraces, balconies etc.). The guidance defines noise levels of 55 dB $L_{Aeq, 16 \text{ hour}}$ as the onset of significant community annoyance for these areas during daytime hours (07:00 and 23:00 hours). It should be noted that these values are aspirational and BS 8233:2014 refers to these levels as 'not achievable in all circumstances where development might be desirable'. In such situations, development should be designed to achieve the lowest levels practicable in external amenity spaces, but development should not be prohibited.

Summary of Proposed Criteria

- 3.11 Based upon the review of standards described above, noise has been assessed in accordance with the following approach:

- BS 8233 for recommended internal noise levels inside the properties. It is considered that an upper internal daytime level of 35 dB $L_{Aeq,16hr}$ for lounges or living rooms and a night-time level for bedrooms of 30 dB $L_{Aeq,8hr}$ should apply. Similarly, a maximum night-time internal level of 45 dB $L_{Amax,f}$ should apply in bedrooms for regular events;
- Noise levels in external amenity areas to be as low as practically possible given the constraints of the scheme.

4.0 AMBIENT NOISE SURVEYS

Methodology

4.1 Environmental noise measurements were undertaken at the undeveloped site in order to establish existing ambient noise levels. Noise measurements were undertaken between 20th and 25th May 2021. The site and measurement locations are shown in Figure 1 and described below:

- Location 1: Eastern boundary of the site, overlooking the M5, approximately 1.8m above local ground level;
- Location 2: Western site boundary, overlooking Winnycroft Lane , approximately 2m above local ground level;

4.2 Additional measurements were also undertaken at three locations during the 25th May 2021 morning rush hour period (08:00 to 09:00 hours).

4.3 Ambient noise measurements were undertaken using the following equipment:

3 N° Rion Class 1 sound level meter	Type NL52;
Brüel and Kjær acoustic calibrator	Type 4231.

- 4.4 All noise measurements were undertaken in free field conditions. Environmental windshields were fitted to the microphones and instrumentation was configured to measure and store overall A-weighted statistical parameters such as L_{Aeq} , L_{Amax} and L_{A90} (all measured on fast response) in 5-minute intervals. Measurements were made in accordance with BS 7445: 1991 "Description and measurement of environmental noise Part 2 - Acquisition of data pertinent to land use" [Reference 6].
- 4.5 Weather conditions during the survey period were variable, with periods of wind and rain. Measurements affected by meteorological conditions have been removed from the assessment.

Measurement Results

- 4.6 Measurement results are shown graphically in Appendix B and are summarised in Tables 3 and 4 below.

Location 1: Measurement Results		
Day 07:00- 23:00 hours Average dB L_{Aeq} 16 hour	Night 23:00- 07:00 hours	
	Average dB L_{Aeq} 8 hour	Typical dB L_{Amax} f
74	70	81

Table 3: Measurement Results, Location 1 (Eastern Boundary)

Location 2: Measurement Results		
Day 07:00- 23:00 hours Average dB L_{Aeq} 16 hour	Night 23:00- 07:00 hours	
	Average dB L_{Aeq} 8 hour	Typical dB L_{Amax} f
60	53	76

Table 4: Measurement Results, Location 2 (Western Boundary)

- 4.7 It should be noted that the levels at Location 1 are at the boundary with the M5 prior to any screening.
- 4.8 24 Acoustics determines the typical maximum noise level to be the tenth highest measured level during the relevant period. Measured ambient noise levels at other representative locations were 59 dB $L_{Aeq, 15 min}$ with maximum noise levels in the order of 62 to 63 dB $L_{Amax, f}$.
- 4.9 It is relevant to note that a development site directly to the north has recently gained planning consent (Planning Reference: 18/01141/REM) for the construction of 420 residential dwellings.

4.10 As part of the approved development to the north, a 3m high barrier / bund combination is proposed to the eastern site boundary. The barrier will also provide a degree of screening to the dwellings proposed within this application, particularly to the northeast.

Noise Propagation Model

4.11 Noise measurements have been used to populate an acoustic model of the site, using IMMI v2021 noise-mapping software, to determine road traffic noise levels at the proposed site. This has used the propagation methodology of CRTN [Reference 7] taking into account the effects of geometric divergence, atmospheric and ground absorption and acoustic screening. The following parameters have been used in the model:

- Ambient temperature: 10 degrees centigrade;
- Relative humidity: 70%;
- Ground effects: G=0 ('hard' ground);
- Downwind propagation conditions.

4.12 The acoustic model has considered the proposed site layout including topography of the site for receptor heights at both ground floor and first floor level (1.5 m and 4 m receptor heights). The proposed 3 to 3.5 m barrier/bund to the eastern boundary and 1.8m fences to select external amenity areas have been included in the model.

4.13 The model assumes that all barriers and fences are of a solid construction, containing no holes or gaps, and comprise a minimum surface density of 15 kg/m².

5.0 ASSESSMENT

5.1 This assessment has considered noise levels in proposed habitable rooms across the development site as well as external noise levels in amenity spaces.

External Noise Levels

5.2 Noise measurement and propagation results show that, based on proposed layout plans (from Origin 3 Studio Ltd dated 9th December 2022) and including losses due to the proposed barrier topped bund, external noise levels in the majority of private gardens will be lower than the BS 8233 upper guideline value of 55 dB L_{Aeq, 16 hour}.

- 5.3 Predicted noise levels at the closest external amenity areas to the M5 are shown in Figure 3, along the proposed barrier topped bund location.
- 5.4 In a small number of cases, external amenity noise levels are predicted to exceed 55 dB $L_{Aeq, 16 \text{ hour}}$, however it is relevant to note that the prediction method does not include attenuation from garden fences. In addition the method assumes downwind propagation, which is not normally the case for the arrangement between M5 which is south east of the proposed site (ie, level will normally be lower under prevailing conditions).

Internal Noise Levels

- 5.5 Based on the modelling results, calculations have been undertaken to determine the window, glazing and ventilation requirements for the proposed residential scheme, which will ensure that noise levels inside the properties do not exceed 35 dB $L_{Aeq, 16 \text{ hour}}$ during the day and 30 dB $L_{Aeq, 8 \text{ hour}}$ at night (and also not regularly exceed 45 dB $L_{Amax f}$ at night).
- 5.6 The calculations are based on typical room volumes and window aperture areas and assume a masonry cavity wall construction, achieving a minimum sound insulation performance of 52 dB R_w , with slate/clay tiled roofs.

Windows and Glazing

- 5.7 The required sound insulation performance for each window type is described in Table 5. The recommended locations for each window type to habitable rooms are shown in Figure 2.

Window Type	Minimum Octave (Hz) Band Sound Reduction Index, dB					
	125	250	500	1k	2k	4k
A	24	25	31	42	44	49
B	24	22	29	40	44	46
C	24	20	25	35	38	35

Table 5: Window System Sound Reduction Specification

- 5.8 In making a comparison with the values in Table 5, it is important that the figures used are the result of tests in accordance with ISO 10140, Part 2: 2010. The quoted minimum sound reduction specifications must be achieved by the entire window system as a whole, including glazing, frames, seals, any insulated panels. The requirements also apply to any external doors to habitable rooms.

- 5.9 Acoustically rated window systems will be required to achieve the minimum sound reduction performance for Window Types A and B. The performance of Window Type C can typically be achieved by standard thermal double glazing, subject to the window system as a whole (i.e. frames, seals, etc) achieving the minimum sound reduction performance.
- 5.10 For guidance, manufacturer’s data for the following glazing configurations would be capable of achieving the required sound reduction performance, if installed correctly and with suitably rated frames and adequate seals:
- Window Type A (37 dB $D_{n,e,w}$): 6mm glass; 12mm cavity; 6.4mm Stadi Silence (or similar);
 - Window Type B (34 dB $D_{n,e,w}$): 4mm glass; 12mm cavity; 6.4mm Stadi Silence (or similar);
 - Window Type C (31 dB $D_{n,e,w}$): 4mm glass; 12mm cavity; 4mm glass.
- 5.11 Note, the above is provided for guidance and costing purposes only. Final window/glazing selections should be based on the performances provided in Table 5.

Ventilation

- 5.12 The required sound insulation performance for trickle ventilation units is described in Table 6. The recommended locations for each vent type are shown in Figure 2.
- 5.13 Note, it is recommended that a Mechanical Ventilation and Heat Recovery (MVHR) system is used to provide ventilation to select plots at the southern and eastern site boundaries (see Figure 2). An alternative ventilation strategy for these areas would be to install individual mechanical ventilators in the habitable rooms, capable of achieving 50 dB $D_{n,e,w}$ (e.g. Sonair F+).

Ventilation Type	Minimum Octave (Hz) Band Sound Reduction Index, dB					
	125	250	500	1k	2k	4k
A	40	36	34	35	44	40
B	40	36	35	31	32	37
C	23	26	29	30	33	33

Table 6: Trickle Vent Sound Reduction Specification

- 5.14 Note that the stated minimum performance value for each ventilation unit is for the open vent and assumes one ventilator per habitable room.
- 5.15 In making a comparison with the ventilation acoustic specification in Table 6, it is important that the vent manufacturer's test data is the result of laboratory tests undertaken on the specific model, size, and free area of the proposed unit. The tests must be undertaken with the vent open and installed in a manner that is representative of the proposed installation. If multiple vents are required, it will be necessary to correct the test data to allow for the number of vents required in each room (please confirm if this is the case).
- 5.16 For guidance, manufacturer's data for the following ventilation units would be capable of achieving the required sound reduction performance if installed properly (minimum performance for when vent is open):
- Ventilation Type A (39 dB $D_{n,e,w}$): Simon Acoustic EHAS;
 - Ventilation Type B (33 dB $D_{n,e,w}$): Simon Acoustic FV;
 - Ventilation Type C (32 dB $D_{n,e,w}$): Standard trickle vent.
- 5.17 Any considerations affecting the acoustic performance that are specific to each model of vent (e.g. angle of incidence) should be considered by the ventilation unit's supplier/manufacturer and factored into the quoted sound insulation performance.

6.0 CONCLUSIONS


- 6.1 24 Acoustics Ltd has been instructed by Bromford to undertake a noise impact assessment at a proposed development site known as Land at Snow Capel, Gloucester. It is proposed to submit a planning application to develop the site for residential use for 190 dwellings.
- 6.2 Environmental noise measurements have been undertaken at the site to establish the prevailing ambient noise levels.
- 6.3 External noise levels in the majority of private gardens within the developed site are predicted to be at or below 55 dB $L_{Aeq, 16\text{ hour}}$.
- 6.4 Calculations have been undertaken, based upon typical room volumes and glazed areas, which show that a satisfactory internal environment in all habitable rooms can be achieved via the specification of appropriate glazing and ventilation.
- 6.5 On the above basis, it is considered that satisfactory noise levels can be achieved throughout the proposed development.

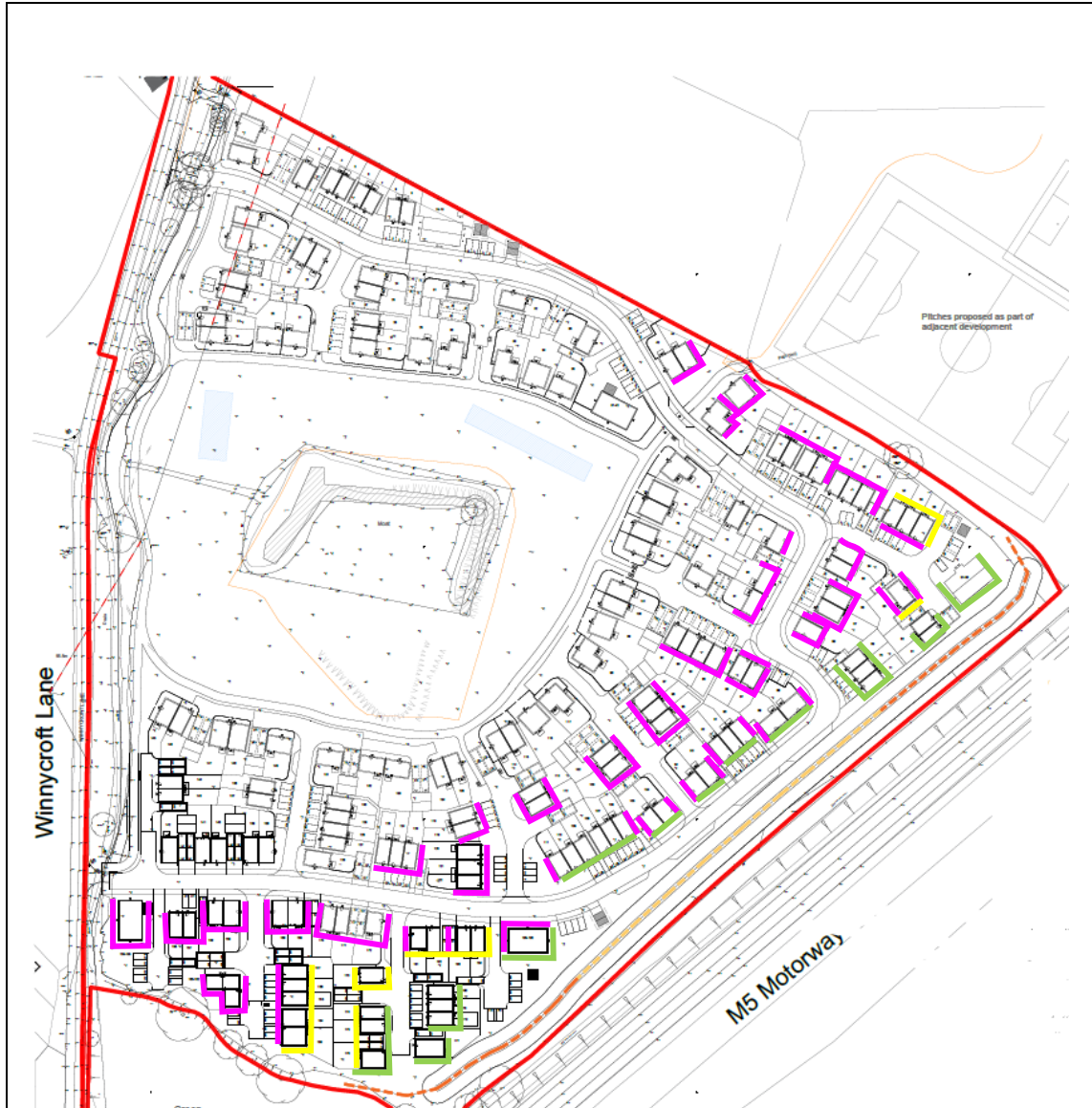
REFERENCES




1. Department for Communities and Local Government. National Planning Policy Framework, Revised July 2021.
2. DEFRA. Noise Policy Statement for England, 2010.
3. Department of Communities and Local Government. National Planning Practice Guidance, July 2019.
4. British Standards Institution. British Standard 8233: Guidance on sound insulation and noise reduction for buildings, 2014.
5. World Health Organisation. Guidelines for Community Noise, 2000.
6. British Standards Institution. British Standard 7445: 1991 Description and measurement of environmental noise Part 2 - Acquisition of data pertinent to land use.
7. Department of Transport. Calculation of Road Traffic Noise, 1988.




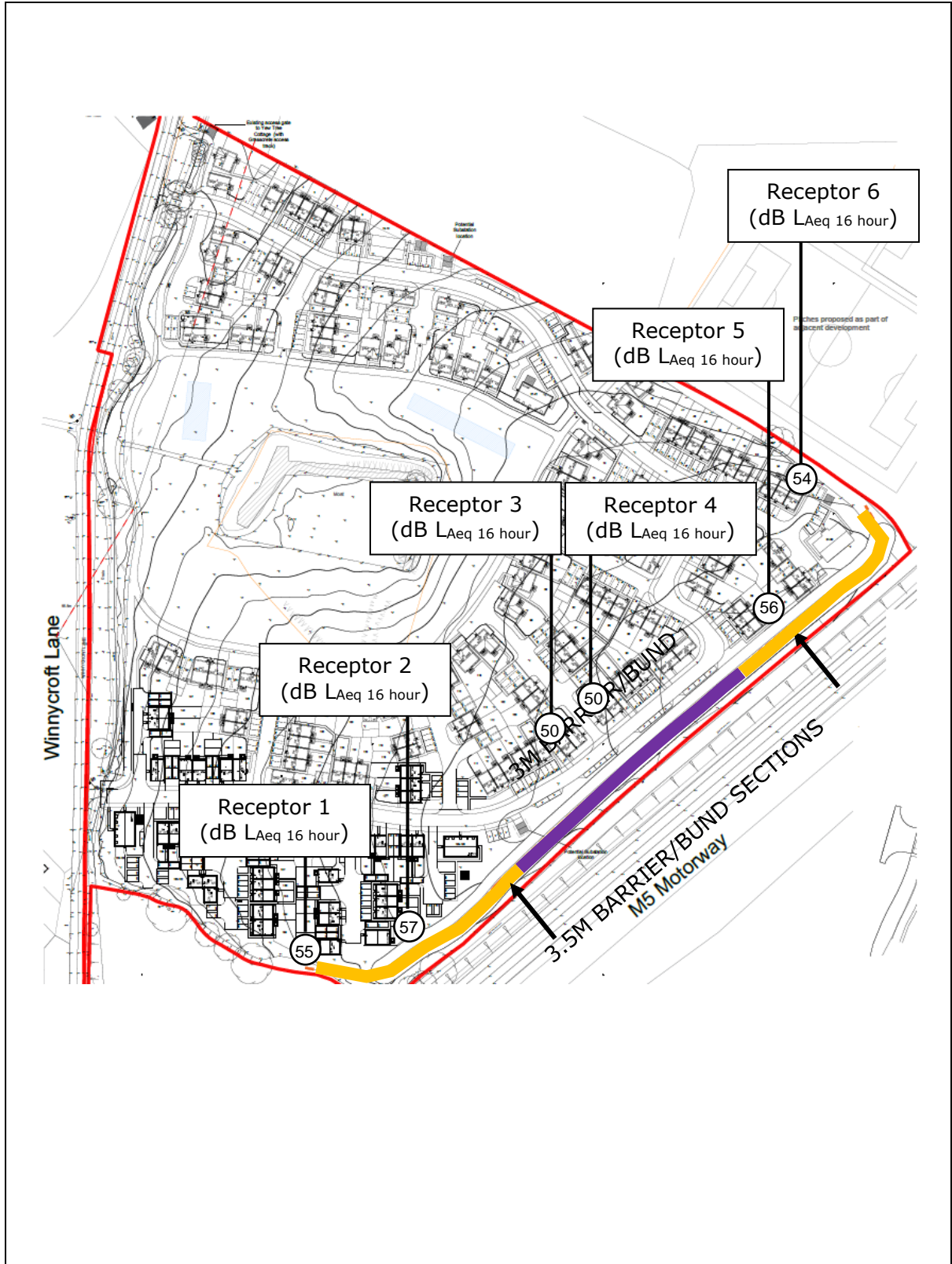
 Additional Measurement Locations


Project: Land at Snow Capel, Gloucester		Title: Site Location Plan/ Measurement Locations		
DWG No: Figure 1	Scale: N.T.S.	Rev: 0		
Date: December 2022	Drawn By: KE	Job No: 9061-1		



<u>Habitable Room Window and Vent Type Locations:</u>	
Window Type A and MVHR	
Window Type B and Vent Type A	
Window Type C and Vent Type B	
Window Type C and Vent Type C	All unmarked façades

Project: Land at Snow Capel, Gloucester	Title: Proposed Development Scheme and Habitable Room Window/Vent Type Locations		
DWG No: Figure 2	Scale: N.T.S.	Rev: 0	
Date: December 2022	Drawn By: KE	Job No: 9061-1	



Project: Land at Snow Capel, Gloucester	Title: External Amenity Predicted Daytime (07:00 to 23:00 hours) Noise Levels dB LAeq 16 hour		
DWG No: Figure 3	Scale: N.T.S.	Rev: 0	
Date: December 2022	Drawn By: KE	Job No: 9061-1	

APPENDIX A: NOISE UNITS

Noise

Noise is defined as unwanted sound. The range of audible sound is from 0 to 140 dB. The frequency response of the ear is usually taken to be around 18 Hz (number of oscillations per second) to 18000 Hz. The ear does not respond equally to different frequencies at the same level. It is more sensitive in the mid-frequency range than the lower and higher frequencies and because of this, the low and high frequency components of a sound are reduced in importance by applying a weighting (filtering) circuit to the noise measuring instrument. The weighting which is most widely used and which correlates best with subjective response to noise is the dB(A) weighting. This is an internationally accepted standard for noise measurements.

For variable sources, such as traffic, a difference of 3 dB(A) is just distinguishable. In addition, a doubling of traffic flow will increase the overall noise by 3 dB(A). The 'loudness' of a noise is a purely subjective parameter, but it is generally accepted that an increase/ decrease of 10 dB(A) corresponds to a doubling/ halving in perceived loudness.

External noise levels are rarely steady, but rise and fall according to activities within an area. In an attempt to produce a figure that relates this variable noise level to subjective response, a number of noise indices have been developed. These include:

- i) The L_{Amax} noise level

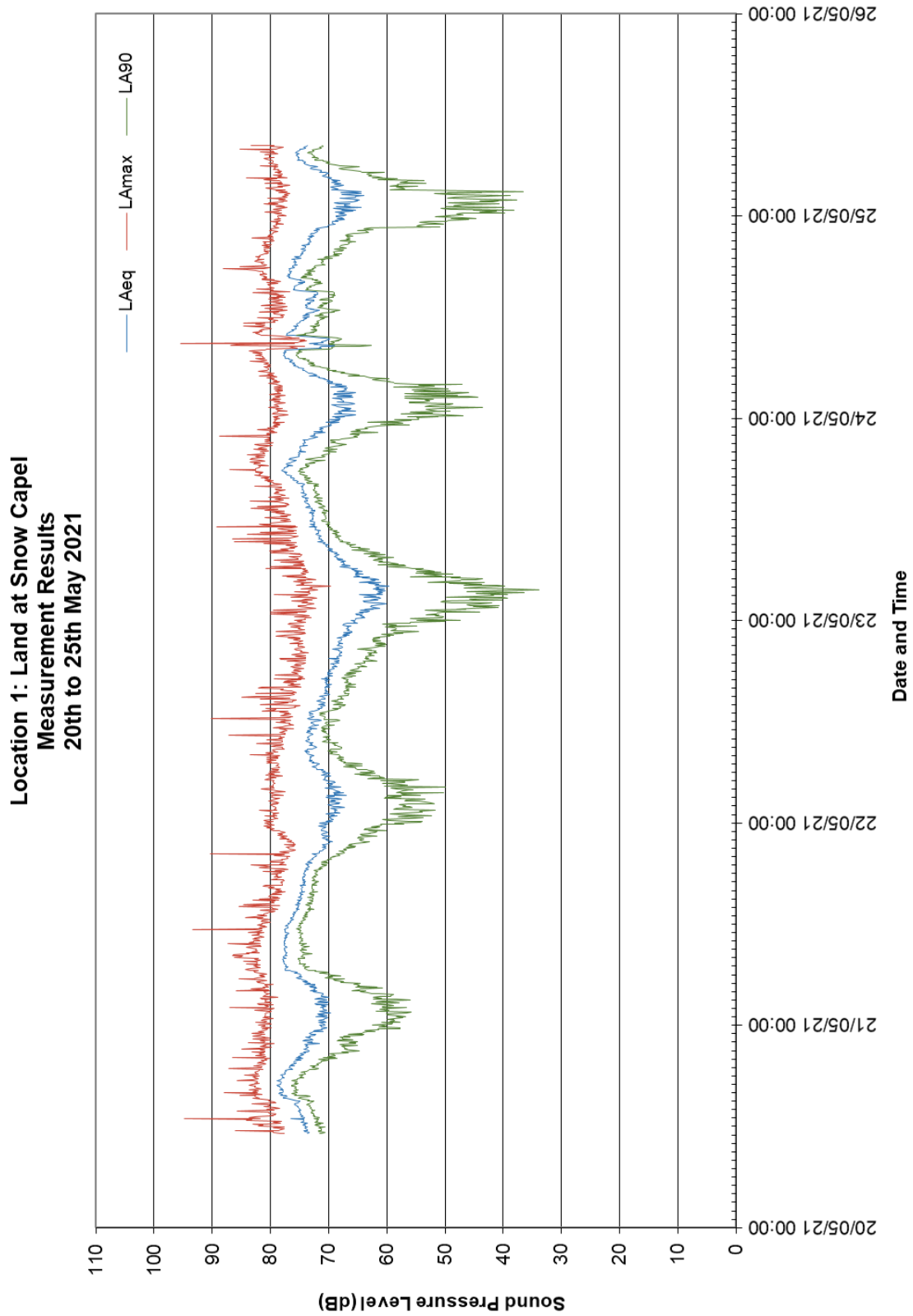
This is the maximum noise level recorded over the measurement period.

- ii) The L_{Aeq} noise level

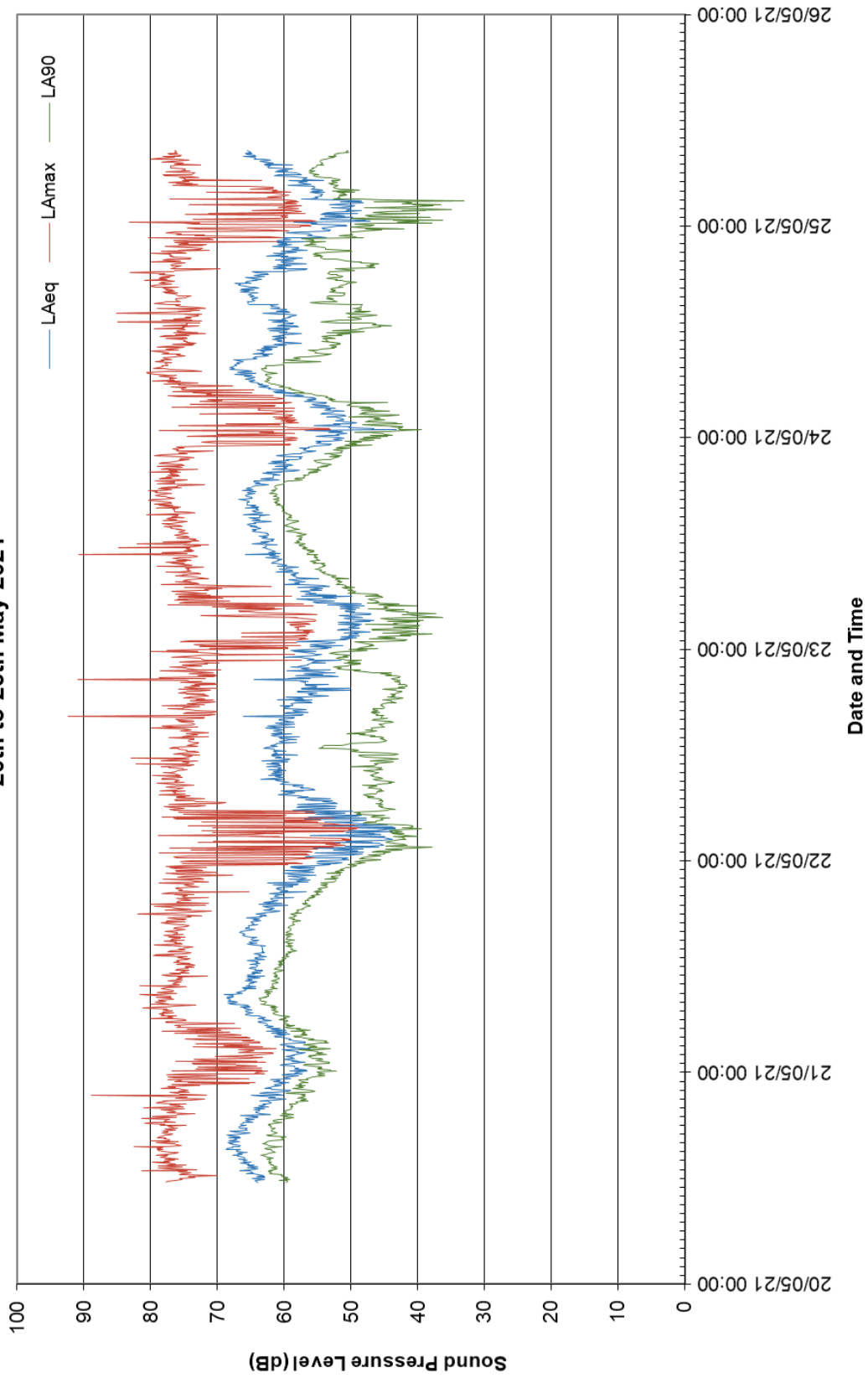
This is "equivalent continuous A-weighted sound pressure level, in decibels" and is defined in British Standard BS 7445 as the "value of the A-weighted sound pressure level of a continuous, steady sound that, within a specified time interval, T, has the same mean square sound pressure as a sound under consideration whose level varies with time".

It is a unit commonly used to describe construction noise and noise from industrial premises and is the most suitable unit for the description of other forms of environmental noise. In more straightforward terms, it is a measure of energy within the varying noise.

APPENDIX B: AMBIENT NOISE MEASUREMENT RESULTS



**Location 2: Land at Snow Capel
Measurement Results
20th to 25th May 2021**



Land at Snow Capel Farm, Matson, Gloucester

Ecology Addendum

edp3746_r013

- 1.1 The following Ecology Addendum has been written by The Environmental Dimension Partnership (EDP) Ltd in support of a revised planning application for Land at Snow Capel Farm, Matson, Gloucester. It presents an assessment of the effects of the post-submission revisions to the proposed development on ecology matters. In this regard it represents an addendum to the following documents;
- Ecology and Biodiversity Chapter of the Environmental Statement – Land at Snow Capel Farm, Matson, Gloucester;
 - Ecological Baseline Report (Reference: edp3746_r006); and
 - Biodiversity Net Gain Assessment (Reference: edp3746_r007).
- 1.2 The masterplan illustrating the revised development is at **Appendix EDP 1**. In this regard the following changes to the previously submitted scheme are proposed which are pertinent to ecology;
- The layout has been modified regarding the central grassland within the Site following comments from Gloucester City Council regarding the Scheduled Monument within the Site;
 - House types have been changed to Bromford's new range; and
 - Inclusion of swales within the central area of open space.
- 1.3 These changes will not have any further impacts upon any protected or notable species present within the Site beyond that which has been previously set out in the Environmental Statement Chapter. All changes affect areas that were previously being lost to development. The mitigation previously outlined is deemed valid and sufficient to prevent any significant impacts upon the conservation status of the protected and notable species within the Site.
- 1.4 The changes mean the habitats within the Site differ slightly to that which was previously submitted and thus has impacted upon the biodiversity net gain calculations.
- 1.5 The central area of green space has increased by 0.06 hectares (ha) due to the realignment of footpaths surrounding the Scheduled Monument. The footpaths have been moved closer to the edge of the residential buildings and has reduced the amount of amenity grassland on the residential edges.



- 1.6 Two swales which measure 0.05ha in total have now been included in the central area of open space. The swales are located on the eastern and southern edges of the open space. These have replaced areas that were previously proposed to be neutral grassland.
- 1.7 The following changes have therefore been made in the biodiversity net gain calculator which is included as **Appendix EDP 2**;
- +0.01ha of Other Neutral Grassland;
 - +0.05ha of Urban Swale; and
 - -0.06ha of Modified Grassland.
- 1.8 The revised biodiversity net gain score is +2.94 habitat units (+17.10%). This is a higher score than that of the previous calculations which produced a net gain of +2.86 habitat units (+16.63%). Therefore, the scheme still exceeds the biodiversity net gain requirements of local and national planning policy.
- 1.9 There have been no changes to the linear calculations, and they remain at +3.89 (+31.33%).
- 1.10 It is therefore concluded that the revisions to the application will have no further impacts on ecology beyond those that outlined in the original application.

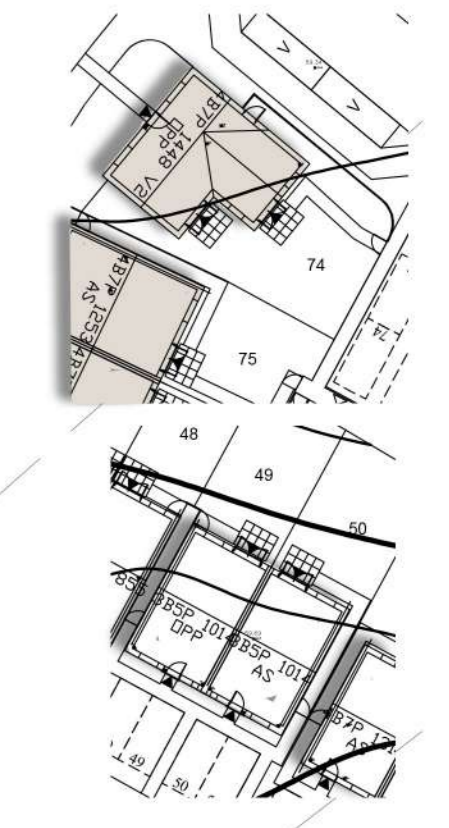


**Appendix EDP 1
Proposed Site Plan**



Tier 1 Housing

Tier 2 Housing



- Acoustic fence on Bund (1.5m)
- Localised heightening of Acoustic fence on Bund (2m)

Note: Bund to be 1.5m before acoustic fence added

Legend:

- 1.8m Closeboard fence
- 1.8m Screen Wall
- Low Stone Wall
- 0.9m Private Path
- 1.2m Private Path M4(3)
- Private Parking Space
- Visitor Parking Space
- Bin Collection Points
- Proposed Hedge
- Proposed Trees

NOTE: Please refer to detailed landscape design for full landscape proposals

proj: 19-026 drg: 0030 date: 14/12/22 rev: F

ORIGIN3
 Tyndall House
 17 Whiteclades Road, Clifton
 Bristol, BS8 1PB

1:500 @ A0 / 1:1000 @ A2

Snow Capel, Matson
Proposed Site Plan
 Bromford & EWH



Appendix EDP 2
Biodiversity Net Gain Calculator

Headline Results

[Return to results menu](#)

On-site baseline	<i>Habitat units</i>	17.22
	<i>Hedgerow units</i>	12.42
	<i>River units</i>	0.00
On-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	20.16
	<i>Hedgerow units</i>	16.31
	<i>River units</i>	0.00
On-site net % change <small>(Including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	17.10%
	<i>Hedgerow units</i>	31.33%
	<i>River units</i>	0.00%
Off-site baseline	<i>Habitat units</i>	0.00
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Off-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	0.00
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Total net unit change <small>(including all on-site & off-site habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	2.94
	<i>Hedgerow units</i>	3.89
	<i>River units</i>	0.00
Total on-site net % change plus off-site surplus <small>(including all on-site & off-site habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	17.10%
	<i>Hedgerow units</i>	31.33%
	<i>River units</i>	0.00%
Trading rules Satisfied?	Yes	

A-1 Site Habitat Baseline

Condense / Show Columns

Condense / Show Rows

Main Menu

Instructions

Ref	Habitats and areas			Distinctiveness	Condition	Strategic significance	Suggested action to address habitat losses	Ecological baseline
	Broad habitat	Habitat type	Area (hectares)	Distinctiveness	Condition	Strategic significance		Total habitat units
1	Grassland	Modified grassland	7.71	Low	Poor	Area/compensation not in local strategy/ no local strategy	Same distinctiveness or better habitat required	15.42
2	Heathland and shrub	Bramble scrub	0.06	Medium	Poor	Area/compensation not in local strategy/ no local strategy	Same broad habitat or a higher distinctiveness habitat required	0.24
3	Lakes	Ponds (Priority Habitat)	0.13	High	Moderate	Area/compensation not in local strategy/ no local strategy	Same habitat required	1.56
4								
5			7.90					17.22

Retention category biodiversity value						Bespoke compensation agreed for unacceptable losses	Comments	
Area retained	Area enhanced	Baseline units retained	Baseline units enhanced	Area lost	Units lost		Assessor comments	Reviewer comments
0.32	0.31	0.64	0.62	7.08	14.16		Grassland contains a low diversity of species of less than 5 per m2. Therefore the grassland is of low value.	
	0.06	0.00	0.24	0.00	0.00		Scrub along boundaries - assume retained in association with fence lines and hedgerows and enhanced	
0.13		1.56	0.00	0.00	0.00		Retained in full	
0.45	0.37	2.20	0.86	7.08	14.16			

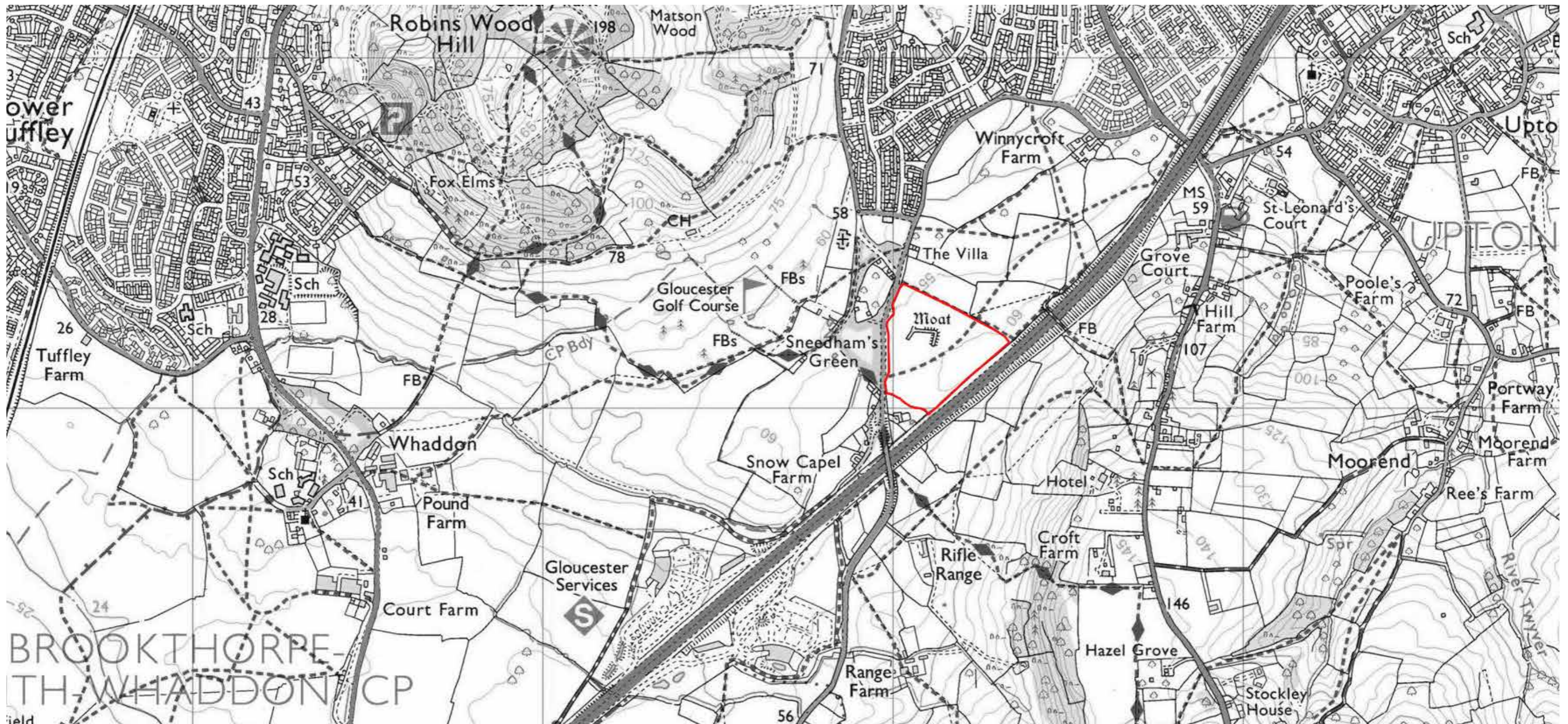
A-3 Site Habitat Enhancement


Condense / Show Columns Condense / Show Rows
 Main Menu Instructions

Baseline ref	Baseline habitats									Four developed/ post intervention habitats																		Comments										
	Baseline habitat	Total habitat area	Baseline distinctiveness band	Baseline distinctiveness score	Baseline condition category	Baseline condition score	Baseline strategic significance category	Baseline strategic significance score	Baseline habitat value	Suggested action to address habitat losses	Proposed Habitat (Pre-Populated but can be overridden)		Change in distinctiveness and condition		Area (hectares)	Distinctiveness	Score	Condition	Score	Strategic significance			Temporal risk multiplier					Difficulty risk multipliers					Habitat units delivered	Assessor comments	Reviewer comments			
											Proposed Broad Habitat	Proposed habitat	Distinctiveness change	Condition change						Strategic significance	Strategic significance	Strategic position multiplier	Standard time to target condition (years)	Habitat enhanced in strategy (years)	Delay in starting habitat enhancement (years)	Standard or adjusted time to target condition	Final time to target condition (years)	Final time to target multiplier	Standard difficulty of enhancement	Applied difficulty multiplier	Final difficulty of enhancement	Difficulty multiplier applied						
1	Orchard - Modified grassland	3.71	Low	4	Poor	1	Low Strategic Significance	15.82	15.82	Gain distinctiveness or better habitat condition	Orchard	Other neutral grassland	Low - Medium	Lower Distinctiveness Habitat Medium	0.31	Medium	4	Moderate	2	Area/compensation not in food strategy to look at strategy	Low Strategic Significance	1	10	0	0	Standard time to target condition applied	10	0.700	Low	Standard difficulty applied	Low	1	1.91					
2	Headland acid shrub - Bracken scrub	0.06	Medium	6	Poor	1	Low Strategic Significance	0.24	0.24	Gain distinctiveness or better habitat condition	Headland acid shrub	Mixed scrub	Medium - Medium	Poor - Good	0.08	Medium	4	Good	1	Area/compensation not in food strategy to look at strategy	Low Strategic Significance	1	10	0	0	Standard time to target condition applied	10	0.700	Low	Standard difficulty applied	Low	1	0.58					

Snow Capel, Matson, Gloucester LVIA Addendum & Rebuttal

On behalf of **Edward Ware Homes**
November 2022



	FINAL	AJW	AS	JBA	November 2022
Revision	Purpose	Originated	Checked	Authorised	Date
Document Number: JBA 21/169 - Doc 1 Rev B Addendum		Document Reference: LVIA Addendum & Rebuttal Snow Capel, Matson, Gloucester			
					

CONTENTS

1. INTRODUCTION	1	6. SUMMARY AND CONCLUSIONS	16	LIST OF FIGURES - Extracted from LVIA	
1.1 Background		6.1 General Comments		Figure 1 Site Location and Study Area	1
1.2 Site Location and Context		6.2 Summary of Landscape Effects		Figure 10 Visual Analysis Plan	12
1.3 Purpose and Approach		6.3 Summary of Visual Effects			
		6.4 Final Conclusion			
2. METHODOLOGY	2			TABLES - Extracted from LVIA	
2.1 Background				Table 2: - Landscape Receptors and Sensitivity	7
2.2 Assessment Approach				Table 3 - Summary of Visual Effects	15
3. PLANNING POLICY FRAMEWORK	2				
4. LANDSCAPE CHARACTER	3				
4.1 Background					
4.2 Potential Impact on Landscape Character;					
4.3 Landscape Receptors					
4.4 Landscape Effects					
5. VISUAL ASSESSMENT	9				
5.1 Background					
5.2 Potential Visual Impact					
5.3 Visual Effects					
5.4 Summary of ZTV					

[This page is intentionally blank]

1. INTRODUCTION

1.1 Background

1.1.1 James Blake Associates Ltd. (JBA) has been instructed by Edward Ware Homes to prepare an Addendum to the previously produced LVIA and a Landscape Rebuttal Statement in response to the LPA Landscape Officer comments and AONB consultee comments, on the proposed Site for residential development, located off Winnycroft Lane, Matson, Gloucester ('the Site').

1.2 Site Location and Context

1.2.1 The Site, approximately 7.9ha, is situated off Winnycroft Lane, Matson. It lies immediately south west and abutting the boundary of the Joint Core Strategy Strategic Allocation site at Winnycroft, outside of the main settlement boundary. The location and boundaries of the Site are shown in **Figure 1**.

1.2.2 The Site consists of meadow grass, with a central moat, a Scheduled Monument, with mature boundary hedgerows that remain in tact in the majority. It is set in a vale between Robinswood Hill and the Cotswolds escarpment, on the southern fringe of Matson, a suburb of Gloucester.

1.2.3 Further to the south the landscape transitions from edge of Gloucester city to rural countryside with smaller villages and where residential development becomes more sporadic and isolated.

1.3 Purpose and Approach

1.3.1 The purpose of this Addendum and Rebuttal is to address the comments provided by Peter Quinn, Landscape Consultant for Gloucester City Council (GCC) and Simon Joyce, Planning Officer for the Cotswold Conservation Board for the Cotswold Area of Outstanding Natural Beauty.

1.3.2 A meeting held 29th November 2022 with David Millinship, Planning Case Officer at GCC and Peter Quinn Landscape Consultant Officer for GCC, the comments and concerns were discussed, and which are further detailed within this report.

1.3.3 These comments were made in response to the LVIA prepared in June 2021 and updated in April 2022 by James Blake Associates to accompany planning application **22/00519/FUL**, for the proposed residential development, car parking, open space and associated infrastructure.

1.3.4 This LVIA Addendum and Rebuttal should be read in conjunction with the Landscape and Visual Impact Assessment Revision B, and the Landscape Masterplan Revision C.

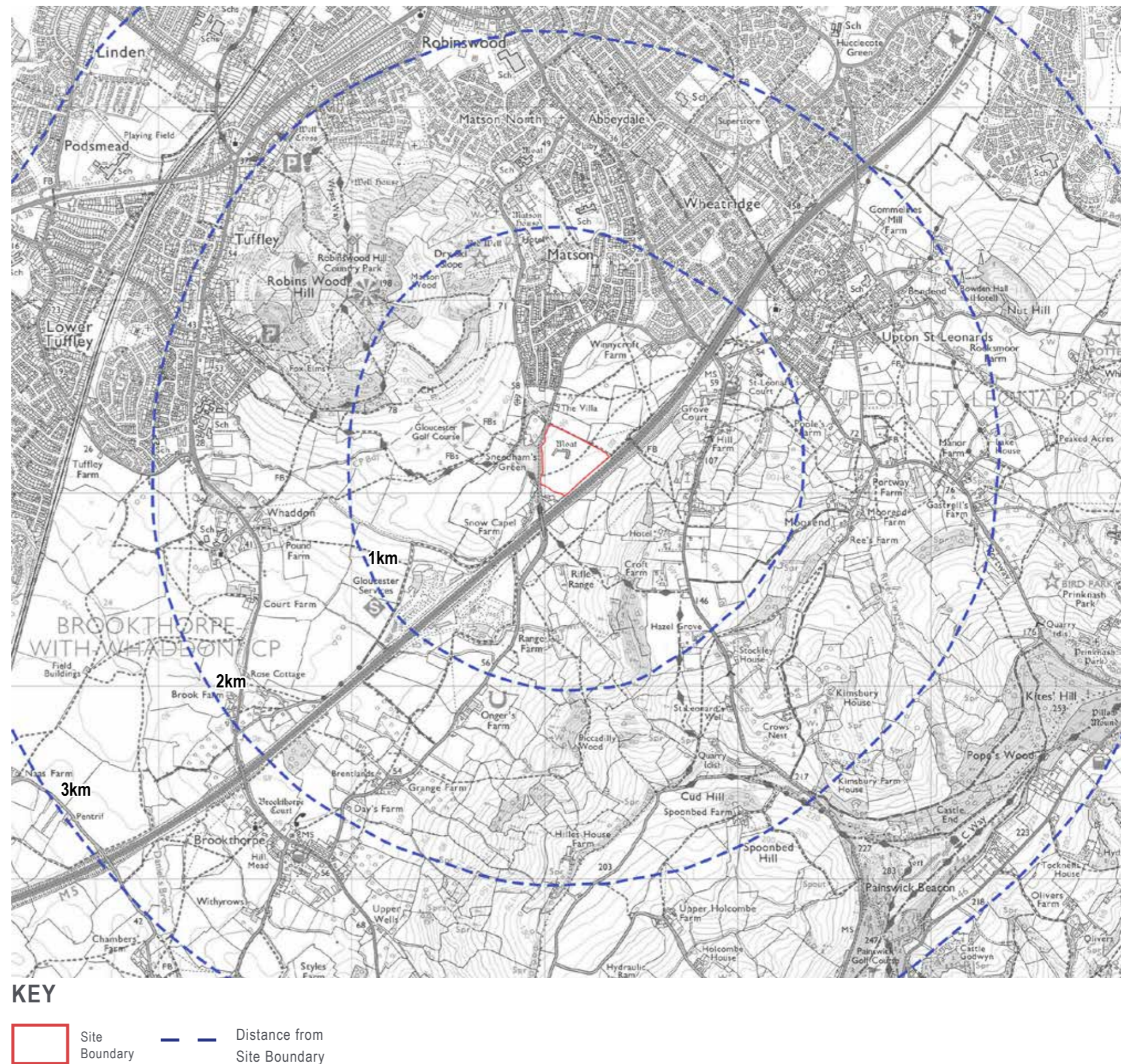


Figure 1: Site Location and Study Area. NTS

Source: Ordnance Survey Crown Copyright 2022. All rights reserved. License Number 100022432

2. METHODOLOGY

2.1 Background

2.1.1 The original LVIA Rev B identified and assessed the landscape and visual effects of the proposed development over the course of the project from construction through to its completion.

2.1.2 Throughout the LVIA a clear distinction is made between landscape (the landscape as a resource) and visual:

- **Landscape Assessment:** The landscape resource incorporates the physical characteristics or elements of the urban and rural environment which together establish the character of each area e.g. geology, soils, topography, hydrology, land cover, land use, vegetation and settlement and the way it is experienced. Landscape effects can arise from changes to individual landscape components, landscape character and sense of place. This includes effects on areas recognised for their landscape value.
- **Visual Assessment:** The visual assessment considers the nature of existing views and visual amenity including the extent of visibility of the site and the proposed development, and the people who might experience them. Visual effects considers how the views of individuals and how they are perceived will change.

2.1.3 The assessment of the Site, the surrounding landscape character and visibility are based on a period of desk study and field survey.

2.2 Assessment Approach

2.2.1 The assessment of landscape and visual effects is based on the following good practice guidelines:

- Landscape Character Assessment Guidance for England and Scotland¹; and
- Guidelines for Landscape and Visual Impact Assessment (GLVIA3)².

2.2.2 In accordance with the guidelines and best practice, LVIA uses a combination of quantitative and qualitative information including informed and reasoned professional judgement. The assessment of the scale of landscape and visual effects follows a systematic and consistent step-by-step process so that rational and transparent conclusions can be drawn.

2.2.3 The comments received do not raise any concerns with the methodology utilised for the original LVIA Rev.B.

1 Landscape Character Assessment Guidance for England and Scotland, Countryside Agency and Scottish Natural Heritage, 2002

2 Guidelines for Landscape and Visual Impact Assessment, Landscape Institute and Institute of Environmental Management and Assessment, Third Edition 2013

3. PLANNING POLICY FRAMEWORK

3.2.1 Policy SD4: LPA Landscape Officer Comments: *'It is not clear that the proposed development respects the character of the site and its surroundings. It would markedly change the character of the site and the adjacent Sneedhams Green, especially if the hedge along the western boundary is removed or much reduced in length or density'*

3.2.2 *'The existing, clear views of the site from the AONB have not been identified anywhere in the application and have, consequently, not been addressed and the development thus does not respond positively to the character of the AONB.'*

3.2.3 Response: It is clearly stated within the LVIA, section 3, paragraph 3.2.8 and 3.2.10 that trees and hedgerows to boundaries will be retained and enhanced, with the exception of new vehicular access points, paragraph 3.2.4.

3.2.4 To state that views from the AONB have not been identified is incorrect. Representative views from the AONB are clearly shown on Figure 10, furthermore each Viewpoint is accompanied within the report with a mini map to illustrate where the viewpoint is taken from, with detailed information including OS grid reference, AOD and distance from site. Of the 18 representative viewpoints around the Site, 8 are taken from within the AONB.

3.2.5 The methodology within the LVIA at paragraph 2.4.13 clearly states *'The viewpoints and supporting photographs do not provide continuous coverage of all locations within the vicinity,'* and continues at paragraph 2.4.14 *'As such all views and visual amenity are best experienced in the field.'*

3.2.6 Policy SD6: LPA Landscape Officer Comments: *'The proposals do not appear to protect or enhance the landscape character, and, in particular, have a detrimental effect on a landscape feature, the moat, which makes a significant contribution to the landscape character of the site and thus the area. Furthermore, proposals for appropriate mitigation do not appear to have been submitted: the effect on the clear views from the AONB and the key visual link and green corridor between the AONB and Robinswood Hill have not been identified in the LVIA or elsewhere and have consequently, not been appropriately mitigated.'*

3.2.7 Response: The landscape character of the Site is fully explored within the LVIA through section 5.7, with specific mention of the SM moat at 5.7.2. Furthermore the SM moat is established at 5.6.13 Landscape Designations. The SM moat is explored within On-Site Vegetation within the Landscape Effects and summary Table 2. The heritage aspect of the SM moat is fully explored within the Heritage Impact Assessment and has at every stage been discussed and the Site layout proposals evolved through various iterations ensuring both landscape (character and visual amenity) and heritage have lead the proposed development of the site.

3.2.8 In terms of *'significant contribution to the character of the site'*, the findings of the LVIA would disagree, the moat currently overgrown and is barely discernable amongst vegetation. Development of the Site allows enhancement and establishing information boards to explain the history and context. The visual and landscape connection is retained towards WInnycroft Lane and Sneedhams Green beyond. All proposals meet the finisngs of the Heritage Impact Assessment.

3.2.9 It is acknowledged that one clear viewing point is afforded from PRoW UPTON ST LEONARDS FOOTPATH 25#2, and that this was unfortunately missed. However, as clearly described and set out within the LVIA methodology at 2.4.13, the viewpoints and supporting photographs do not provide continuous coverage of all locations within the vicinity, but provide a reasonable sample of representative, specific and illustrative views. As is best practice and set out within the Guidelines for Landscape and Visual Impact Assessment 3rd Edition, (Landscape Institute and Institute of Environmental Management and Assessment).

3.2.10 Just because one view has been missed, it is untrue to state that the development proposals have not been properly mitigated against potential effects.

3.2.11 Policy SD7: LPA Landscape Officer Comments: *'The proposals do not enhance the landscape or scenic beauty of the AONB in that views from the AONB to the site and beyond to Robinswood Hill are currently predominantly green and rural and would be adversely affected by the development. The scene would become more urban, the green visual link between AONB and Robinswood would be broken and the apparent edge of the city would be extended to the southwest. The proposals are thus not consistent with the AONB management plan.'*

3.2.12 Response: This is inherently untrue. The LVIA assessment demonstrates that the vast majority of views from the AONB experience no change in view following development as proposed. In these views the Site is typically screened by changes in topography along the lower slopes of the escarpment, such that the vale, within which the Site is located, is hidden from view, and the 'green visual link' is maintained.

4. LANDSCAPE CHARACTER

4.1 Background

4.1.1 The original LVIA Rev B has been reviewed along with all other plans and documentation, by Peter Quinn, Landscape Consultant for Gloucester City Council and Simon Joyce, Planning Officer for the Cotswold Conservation Board for the Cotswold Area of Outstanding Natural Beauty.

4.1.2 This section addresses the comments on Landscape Character, with the original comments set out, followed by the response, and accompanied by updated information as appropriate.

4.2 Potential Impact on Landscape Character;

4.2.1 Cotswold AONB Planning Officer (AONB Officer) Comments: The Cotswold AONB Landscape Character Assessment covers the area immediately east of the M5 which defines the site's eastern boundary. It classifies the character of the area as Settled Unwooded Vale Landscape Character Type, the same character type classification as the site within the wider Gloucester Landscape Character Assessment. Therefore, it is reasonable to apply the Board's Landscape Strategy and Guidelines in this instance. These state that *"the rural areas that provide a setting to the Cotswolds escarpment areas are highly sensitive to development... of particular sensitivity are those areas of the agricultural landscape that provide a landscape setting to urban areas"*.

4.2.2 Whilst it is accepted that the screening effects of landform, occasional woodlands, hedgerows and shelterbelts provide an opportunity for development, *"care must be taken to ensure that a cumulative effect of such development does not occur, or have an adverse effect on the more rural character of the area"*.

4.2.3 Response: The AONB Officer notes some of the key characteristics of the Settled Unwooded Vale LCT, but equally as important are the following key characteristics, as noted in the LVIA at para 5.4.2;

- *Soft rolling or gently undulating landform, with the Cotswolds Escarpment defining the eastern limit of the Vale and providing a dramatic backdrop to vale settlements and landscapes;*
- *Quiet winding lanes linking villages, hamlets and farms at the foot of the escarpment contrast to major transportation corridors running through the wider vale landscape. Many roads are dead-ends, terminating at the base of the scarp;*
- *Rural areas bordered by large urban and suburban areas and interspersed with commercial and industrial uses indicating the close proximity of large urban centres and major transportation links.*

4.2.4 The AONB Strategies and Guidelines for this LCT include (LVIA para 5.4.4);

- *Maintain the open, sparsely settled character of the Unwooded Vale by limiting new development to existing settlements and avoiding development between existing villages;*

- *Avoid development that will intrude negatively into the landscape and cannot be successfully mitigated, for example, extensions to settlements in areas of open landscape.*

4.2.5 These strategies therefore direct new development to existing settlement edges, and furthermore direct new development to retain existing vegetation, protect historical features and avoid standard development layouts, along with safeguarding and enhancing the PRoW network, all of which the Proposed Development achieves.

4.2.6 The AONB Officer recognises the wider Landscape Character Type of the Settled Unwooded Vale LCT, however this is further subdivided in the Gloucester Landscape Character Assessment and the Site lies within the Vale of Berkeley Landscape Character Area (LCA) which specifically notes the following, as set out at para 5.3.5 in the LVIA;

- *Vale of Berkeley comprises a large scale, gently undulating landscape but with extensive almost flat areas commonly lying between the undulations.'*
- *'Although the patchwork pattern of land uses and tree cover in the vale give this area a strong rural character, the presence of several major transportation corridors in the area disrupt the rural tranquillity and contribute to its settled character.'*
- *'Settlement forms a strong influence on the overall character of the Vale of Berkeley with views towards built form commonly occurring in the wider landscape.'*

4.2.7 This provides a further level of detail, which is supported by the survey findings of the LVIA, such that the Proposed Development Site is influenced by the existing settlement and major transport routes.

4.2.8 LPA Landscape Officer Comments: Landscape character *'descriptions point to the very rural nature of the landscape of the site and its immediate surroundings and the importance of the relationship between the AONB and Robinswood Hill. The proposed development would be at odds with the above description: it would cause a change to the very rural nature of the landscape and would adversely affect the green visual link between the AONB and Robinswood Hill.'*

4.2.9 Response: The LVIA acknowledges that any development will give rise to change in the landscape of the area and the views of receptors. The degree of change will influence the judgement on acceptability and will need to be balanced with the overall benefits delivered by the scheme (paragraph 8.4.1).

4.2.10 The Site is already influenced by existing settlement of Matson and abuts residential development at Winnycroft Lane, with the M5 forming the eastern boundary. The Site sits within a character type named 'Settled Unwooded Vale', which is further subdivided into the 'Vale of Berkeley' character area, which provides a more detailed level of character division as follows; *'Although the patchwork pattern of land uses and tree cover in the vale give this area a strong rural character, the presence of several major transportation corridors in the area disrupt the rural tranquillity and contribute to its settled character.'*

4.2.11 And; *'Settlement forms a strong influence on the overall character of the Vale of Berkeley with views towards built form commonly occurring in the wider*

landscape.'

4.2.12 Therefore it is accurate to describe the area of the Site and immediate surrounds as settled vale. It therefore cannot be described as 'very rural'.

4.2.13 Viewpoints 15 and 18 ably demonstrate the nature of the settled vale landscape, and indeed the wider Vale of Gloucester settled vale landscape, interspersed with the green and verdant Hills, such as Robinswood Hill, May Hill and Churchdown Hill.

4.2.14 LPA Landscape Officer Comments: The LPA Officer states the rural character is *'reinforced by the following statement on visual context which describes the adjacent area of Robinswood Hill; Owing to the topography Robinswood Hill is a focal point for much of the surrounding area.....Importantly, the Settled Unwooded Vale landscape character type to the south provides green and rural visual continuity when viewed south from the hill (towards the Cotswold AONB), and from the south, looking north towards the hill.'*

4.2.15 The LPA Officer continues; *'The adjacent area of Colethorp, Brookthorpe and West of Whaddon (area P) contains this statement on visual context; This area, combined with that directly south of Tuffley, forms an important rural link between the Cotswolds AONB escarpment and Robinswood Hill. Subsequently, both of these higher landforms give the low lying area a notable sense of enclosure, particularly to the landscape at the foot of the Cotswold escarpment. The higher ground allows clear views across the entire area. However, views within the area can be varied due to the undulating landform and vegetation height. As the M5 has been constructed at a lower level than its surroundings it has less visual impact than may initially be anticipated. Although visible from Robinswood Hill and the Cotswold Escarpment it does not consistently appear as a dramatic sever in the landscape, owing also to the often vegetated banks.'*

4.2.16 Response: The Site is located east of the Hill, abutting the edge of Matson settlement. South of the Hill the landscape is agricultural in nature, which can be described as 'green and rural'.

4.2.17 The village of Whaddon and hamlets of Colethorp and Brookthorpe lie to the south and south west of Robinswood Hill, surrounded by agricultural farmland and long reaching views to Robinswood Hill and the AONB, an entirely different location within the character area, and bear no relation to the location of the Proposed Site, abutting the existing settlement edge of Matson.

4.2.18 Equally, as noted within the LCA description extract the LPA Officer utilises, views within the area are varied due to the undulating landform and vegetation height. Field survey for the LVIA was able to confirm this, with the locally raised topography between Snow Capel Farm and Gloucester Services west of the M5, as well as a locally raised ridge line leading westwards from Gloucester Services on the western side of the M5. This is demonstrated and described at Viewpoint 3 and Viewpoint 4.

4.2.19 The Site context and landscape to the south is set out within the LVIA section 5.7, paragraph 5.7.3, last sentence.

- 4.2.20 LPA Landscape Officer Comments: The LPA Officer refers to G27 and the area being of Medium Sensitivity.
- 4.2.21 Response: This is referred to within the LVIA at 5.5.4. G27 also indicates 'Potential for housing and commercial development though will need to take account of landscape sensitivity and quality in any developable area.'
- 4.2.22 LPA Landscape Officer Comments: The LPA Officer also refers to Robinswood Hill (G28) immediately to the north west and Brookthorpe to Robinswood Hill (G29), of High and High-Medium sensitivity respectfully.
- 4.2.23 Response: Cross valley views are afforded from one topographical feature to the other, namely Robinswood Hill to the AONB escarpment. The Site is demonstrated to sit within the vale, below the typical horizontal view line of the receptor. Viewpoint 6 within the LVIA demonstrates this. The Site is located within an area noted as having potential for housing.
- 4.2.24 LPA Landscape Officer Comments: The LPA Officer states 'The proposed development does not respond adequately to the relationship between the site, Robinswood Hill and the AONB described above and does not appear to take account sufficiently of landscape sensitivity and quality.'
- 4.2.25 Response: This statement is entirely incorrect. All areas of relevance have been covered and are noted within the LVIA as referenced above.
- 4.2.26 LPA Landscape Officer Comments: The LPA Officer refers to 'The Landscape Analysis of Potential Development Sites of 15/11/2013 by WSP analysed the area of the site and concluded that it was unsuitable for development.'
- 4.2.27 Continues 'Though the area to the northeast of the site, also designated unsuitable has been developed, the elements of the analysis that lead to the conclusion that it was unsuitable are still largely present and relevant.'
- 4.2.28 Response: The use of this document is surprising due to its date of completion, and as landscape is dynamic in nature, the desktop and field surveys of the LVIA represent up to date evidence of the landscape of the Site and surrounds.
- 4.2.29 As stated by the LPA Landscape Officer, despite being described as 'unsuitable', land **has** been developed for residential dwellings, likely largely in part due to the individual assessment findings and evidence such an assessment can provide to demonstrate the potential minimal impact such sites may have on the surroundings.
- 4.2.30 As demonstrated by the LVIA for this Site, this has been a truly landscape and heritage led masterplan, for a Site that is relatively well contained by existing topography and vegetation, abuts existing residential settlement and the M5, in an established settled vale, with minimal effect on neighbouring AONB or Robins Wood Hill.
- 4.2.31 LPA Landscape Officer Comments: The LPA Officer states 'The proposals re-route the existing PRoWs across the site in a way that seems only to benefit the developers. The existing footpath EUL23 which quite clearly follows the route of a convenient desire line across the field at present, is around 310m in length from hedge to hedge. The proposals increase the length of the route by 30% to c.420m. This does not appear to put pedestrians first.'
- 4.2.32 Response: PRoW routes are there to be enjoyed and are not the same as highway footpaths which aid shorter and more efficient routes to get from point A to point B. PRoW footpaths are for passive enjoyment, with this particular Site providing enhancement through delivery of educational boards regarding the heritage asset, further enhancing the walking experience.
- 4.2.33 LPA Landscape Officer Comments: The LPA Officer states 'Paragraph 5.7.5 (page 23) states that "The north of the Site is currently bound by existing fields, however these form the JCS Strategic Allocation, which now has detailed permission for residential development". It should be made clear that the fields immediately adjacent to the northern boundary of the site are not being developed for housing and will remain almost entirely green.'
- 4.2.34 Response: The fact remains that the land to the immediate north of the Site forms part of the Strategic Allocation of residential development, as opposed to employment / commercial and or industrial. It is not to remain in agricultural use. Land use will permanently change from agricultural to residential development and associated open space and infrastructure, and the change in character is assessed as such.
- 4.2.35 LPA Landscape Officer Comments: The LPA Officer states 'Paragraph 5.7.6 (page 23) states that there is "a PRoW running through the site". This implies that there is a single path running through the site. There are actually two: EUL24 and EUL 23 as shown on p.7 of the LVIA and elsewhere.'
- 4.2.36 Response: Noted - a minor mistake.
- Landscape Effects;**
- 4.2.37 AONB Officer Comments: In its assessment of landscape effects at Section 5.9, the LVIA considers that the magnitude of landscape change on the setting of the AONB would be 'negligible' both during construction and at completion. Such magnitude of change, when combined with the assessed 'high' landscape value, susceptibility and sensitivity is shown in Table 2 of the LVIA as resulting in a 'negligible' scale of effect on landscape character. However, the LVIA's Table C3, which shows how landscape sensitivity and magnitude of change combine to give an assessment of scale of effect, shows that such 'high' sensitivity and 'negligible' magnitude of change should result in a 'minor' scale of effect rather than 'negligible'.
- 4.2.38 LPA Landscape Officer Comments: Table 2 (page 25) states that "the site is not discernible from the AONB". Paragraph 5.9.15 (page 24) states that "The overall scale of effect on the setting of the Cotswolds AONB will be Negligible". Both of these statements are clearly untrue. The site is very clearly discernible, as the photo in section 2.3 Landscape Characterisation Assessment & Sensitivity Analysis of Gloucester (LCA) above taken from within the AONB from PRoW EUL20 shows:... It should also be noted that the site and the moat would be more clearly visible across a much wider area of the AONB in winter when deciduous trees (the majority of the intervening trees) are bare. Paragraph 5.9.15 (page 24) states that the "development respects the setting of the surrounding area".
- 4.2.39 Paragraph 5.8.3 (page 23) states that "The wider LCTs are considered not to be affected by the proposed development due to intervening vegetation, topography and/or the built environment". The proposed development would affect the adjacent LCTs given that the site can be very clearly seen from footpaths crossing Robinswood Hill and the escarpment area of the AONB.
- 4.2.40 Response: It is acknowledged that there is an error in Landscape Effects Table 2 with regards to the scale of effect for the AONB. The Scheduled Monument and Sneedhams Green have been separately included, previously covered under Site Character and Settlement of Matson. The neighbouring Landscape Character Area Robins Wood Hill has also been added.
- 4.2.41 LPA Landscape Officer Comments: The LPA Officer states 'The site is very clearly discernible, as the photo ... taken from within the AONB from PRoW EUL20 shows. Paragraph 5.9.15 (page 24) states that the "development respects the setting of the surrounding area". This cannot be stated with any confidence when the LVIA has clearly failed to properly study the surrounding area and thus should not be relied upon to have properly assessed its setting. This further throws into doubt the conclusions offered in Table 2.'
- 4.2.42 Response: The assessment provides a very thorough understanding of the Site and surrounds, and one view, does not adequately **represent** the experience from the AONB escarpment as a whole. The GLVIA3 Guidelines are very clear with regards to the use of proportionality and balance in undertaking assessments.
- 4.2.43 The amended list of Landscape Receptors, Landscape Effects and summary Table 2 are set out below.

4.3 Landscape Receptors

- 4.3.1 LPA Landscape Officer Comments: The LPA Officer states ‘Landscape receptors are described in GLVIA3 as “components of the landscape that are likely to be affected by the scheme”. The landscape receptors listed in paragraph 5.8.1 (page 23 of the LVIA) do not include the moat itself. It is then also not separately assessed in the table that follows (Table 2, p.25).
- 4.3.2 Whilst “the overall character of the site” has been included in the list, it is not at all clear why the moat has not been separately named and assessed as a discrete landscape element that will, very clearly, be affected by the proposed development. It is clearly an important landscape receptor and would be expected to be assessed in some detail in landscape terms in the LVIA. This approach cannot be relied upon to properly describe the scale of the effect on the moat itself and thus the conclusions offered in Table 2 cannot be considered reliable.
- 4.3.3 Similarly, Sneedhams Green is not specifically identified as a landscape receptor and the likely effect of the development on the Green is thus not specifically assessed. Should the development go ahead, with the site’s western boundary hedge retained, then this would adversely affect the character of the Green. Should the western boundary hedgerow be removed in whole or in large sections (it is difficult to understand the exact proposals for the hedge) then this could have a much greater adverse effect on the character of the Green.’
- 4.3.4 Response: It is incorrect to state the conclusions within Table 2 cannot be relied upon. The SM moat is mentioned in many of the receptors within the Table although it is acknowledged that it is not separately listed. This is addressed within this Addendum. The SM moat and setting has also been fully assessed through a heritage impact assessment.
- 4.3.5 Sneedhams Green is also now addressed within this Addendum. The boundary hedgerow is to be retained with the exception of the highways access points as required.

4.3.6 The revised list of Landscape Receptors (in no particular order) that may be effected by the proposed development are:

- The Site including:
 - Topography;
 - Land use;
 - On Site Vegetation;
 - The overall Character of the Site;
- Designations:
 - The Cotswolds AONB
 - Scheduled Monument - the moat
- Landscape Character
 - The character of the Vale of Berkeley LCA
 - The character of Robins Wood Hill LCA
 - The character of Sneedhams Green
 - The Settlement Character of Matson

4.3.7 LPA Landscape Officer Comments: The LPA Officer states ‘Paragraph 5.8.3 (page 23) states that “The wider LCTs are considered not to be affected by the proposed development due to intervening vegetation, topography and/or the built environment”. The proposed development would affect the adjacent LCTs given that the site can be very clearly seen from footpaths crossing Robinswood Hill and the escarpment area of the AONB.’

4.3.8 Response: The LCTs, being Types, typically cover larger areas and are therefore less detailed and or accurate when looking at a particular Site, and therefore it is true to say that they are considered not to be affected by one Site, that forms a small part of the wider Landscape Character Type. Robins Wood Hill LCA, being a Landscape Character Area is a smaller specific area adjacent to the Vale of Berkeley LCA and so it is correct to include it as it was missed. This has been addressed within this Addendum. The AONB, already included, has been further clarified.

4.4 Landscape Effects

4.4.1 The assessment of landscape effects during construction and after completion (Year 1 and Year 15) on the landscape resource identified in the LVIA baseline study is summarised in **Table 2** and are described below.

4.4.2 The Table should be read in conjunction with the criteria for determining the magnitude of change in **LVIA Appendix C: Table C1**, the matrix of scale of importance in **LVIA Appendix C: Table C3** and the methodology described within the **LVIA**.

Construction and Temporary Effects

4.4.3 During the construction phase direct and indirect adverse effects to landscape components will result from changes in land cover and alterations to the existing topography, for example through excavation for foundations, access and services. This will occur alongside the provision of temporary infrastructure such as access, the storage of materials; the use of operational plant; and general construction works. All are uncharacteristic features of the landscape, but will generally be temporary and short-term. All construction works will be carried out in full accordance with best practice to avoid, reduce or limit the extent of effects as far as possible. The existing arable land cover within the area identified as developable, will be stripped and topsoil temporarily removed and stored.

4.4.4 Across the Site there will be a temporary disturbance of the existing ground levels arising from the removal and storage of topsoil and excavation for roads, foundations, services and sustainable drainage. The scale of the effect on the topography of the site during construction will be temporary **Minor Adverse**.

4.4.5 The proposed development will result in a permanent change in land use to approximately two thirds of the Site. The existing greenfield land, within the area identified as developable, will be replaced with a temporary construction site. There will be a localised extent of change to land use within the Site boundary which partially alters the character or nature of the wider landscape. This change will result in a permanent **Moderate Adverse** scale of effect at the site level.

4.4.6 Existing vegetation within and on the boundaries of the Site is to be retained where possible and protected during construction. Some removal of existing hedgerow and hedgerow trees will be necessary in order to implement the proposed access points into the Site off Winnycroft Lane. Any vegetation removed will be replaced where possible, resulting in a **Minor Adverse** scale of effect during construction.

4.4.7 The overall character of the Site will temporarily change from a greenfield site to a construction site. Uncharacteristic components will be introduced alongside characteristic features or elements. There will be a noticeable, temporary and localised **Moderate Adverse** scale of effect on the character of the Site and its immediately surrounding area.

4.4.8 The character of the adjacent Sneedham's Green will temporarily change with the construction activities opposite. Construction activity will introduce uncharacteristic elements to the immediately surrounding area. However these will be short term, indirect and temporary in nature. There will be a noticeable, temporary and localised **Moderate Adverse** scale of effect on the character of the Green and its immediately surrounding area.

4.4.9 All construction works will be carried out in full accordance with best practice to reduce adverse landscape effects. Construction activity will introduce uncharacteristic elements to the landscape. However these will be short term and temporary in nature, as such the Vale of Berkeley LCA, of which the Application Site forms part, will experience a temporary **Moderate Adverse** effect during the construction phase. Robins Wood Hill LCA will experience temporary and indirect **Negligible** effects during the construction period.

4.4.10 The character of the setting around the Scheduled Monument moat will temporarily change from a greenfield site to a construction site. Uncharacteristic components will be introduced alongside characteristic features or elements. There will be a noticeable, temporary and localised **Major Adverse** scale of effect on the moat and its immediately surroundings.

4.4.11 The setting to the Cotswolds AONB will experience a temporary **Minor Adverse** effect during the construction phase.

Permanent Development and Effects at Year 1 / Year 15

4.4.12 The Proposed Development has been designed to minimise its effects and to integrate the site into the wider landscape to include the retention and enhancement of the existing landscape structure.

4.4.13 There will be a permanent change to the topography of the Site however this will not alter once the development has been completed resulting in a permanent scale of effect of **Negligible** at Year 1 with no further change.

4.4.14 The Proposed Development would result in the loss of some arable land within the Application Site due to the construction of residential dwellings, and the associated access and planting. There will be a permanent change in land use, of the identified developable area, to a development consisting residential dwellings, open space, and strategic landscape. The Site abuts existing residential areas to the north west and south, along with residential allocation to the north, therefore residential land use is considered appropriate on the Site. There will be a permanent **Moderate Adverse** scale of effect on land use at the site level.

4.4.15 The retained boundary vegetation will provide a mature landscape setting to the proposed development. Proposed Development includes areas of new tree and shrub planting internally and around the perimeter of the Proposed Development. The effect of new planting will initially be limited resulting in a **Minor Adverse** scale of effect. As this planting matures, improving both landscape and ecological diversity the scale of effect will reach **Minor Beneficial** by Year 15.

4.4.16 The area of the Site identified as developable will permanently change from greenfield land to a residential development. The design, scale, layout and landscape of the proposed development considers the character of the surrounding landscape. Vegetation to the site boundaries, within residential areas and open space areas will incorporate locally appropriate native species, with a mix of native and ornamental species to complement and integrate the built form. The effect on the character of the Site will initially be **Moderate Adverse** decreasing to **Minor Adverse** over time as vegetation matures and the proposals integrate into the surrounding landscape.

4.4.17 Sneedhams Green will remain intact. The Site, separated from the Green by Winnycroft Lane, and the area identified as developable will permanently change from greenfield land to a residential development. The Proposed Development will retain, protect and enhance the SM, with new residential development forming a U shape around it, protecting it within a new area of open green space, and retaining the connection to the neighbouring common. The effect on the character of Sneedham's Green will initially be **Moderate Adverse** decreasing to **Minor Adverse** over time as vegetation matures and the proposals integrate into the surrounding landscape.

4.4.18 The proposed development of land identified as developable will be relatively contained by existing vegetated boundaries, with its visibility decreasing over time as the proposed landscaping framework matures. A study of historic maps shows vegetated boundaries, small copses and woodland; indicating a strong agricultural past. However, intensification of farming in the area, including the removal of hedgerow field boundaries and the major transport route of the M5, has changed the landscape dramatically. The overall scale of effect on the wider Vale of Berkeley LCA Landscape Character Area will be **Moderate Adverse** in Year 1 and decreasing over time. By Year 15 the effect on the LCA is considered to be **Minor Adverse** as a result of enhancements to the local vegetation framework and retention of large open space around the central moat SM. Robins Wood Hill LCA will experience **Negligible** effects at Year 1 with no further change.

4.4.19 The proposed development respects the setting of the surrounding area and will be carefully positioned to maximize the value of existing vegetation. In landscape terms the overall scale of effect on the setting of the residential settlement of Matson will be **Negligible**.

4.4.20 The elements that form key characteristics, such as boundary hedgerows and trees and the central Scheduled Monument Moat, remain intact and the character of this part of the Vale of Berkeley between the M5 and the edge of Matson is that of a settled vale, with settlement noted as having a strong influence here. The overall scale of effect on the setting of the Cotswolds AONB will remain **Minor Adverse**.

4.4.21 The character of the setting around the Scheduled Monument moat will permanently change from a greenfield site to a residential development with central green retained around the SM moat. The overall scale of effect will be **Major Adverse** in Year 1 with no further change.

Table 2: Landscape Receptors and Sensitivity

Receptor	Value	Susceptibility	Description	Sensitivity	Development Phase	Magnitude of Change size/scale: extent:	Scale of Effect
Site features							
Topography	Medium	Low	The Site is relatively flat with a gentle slope from west to east, rising from approximately 58m AOD to 60-64m AOD, characteristic of the vale landscape. The Proposed Development will not require any major regrading of the existing land form in order to facilitate the proposed residential development.	Low	Construction	Medium Negative	Minor Adverse
					Completion Year 1	Low Negative	Negligible
					Completion Year 15	Low Negative	Negligible
Land use	Medium	Low	The Site consists of arable agricultural land with a moat Scheduled Monument and an area of scrub at the centre.	Low	Construction	High Negative	Moderate Adverse
					Completion Year 1	High Negative	Moderate Adverse
					Completion Year 15	High Negative	Moderate Adverse
On-site vegetation	Medium	Low	The Site currently comprises meadow grassland, with good boundary vegetation, although gappy in places along Winnycroft Lane and the M5. To the centre of the Site lies the moat Scheduled Monument and an area of scrub. There is a belt of mature trees and shrubs to the eastern boundary with the M5. The Proposed Development will retain, protect and enhance the SM, with new residential development forming a U shape around it, protecting it within a new area of open green space.	Low	Construction	Medium Negative	Minor Adverse
					Completion Year 1	Medium Negative	Minor Adverse
					Completion Year 15	Medium Positive	Minor Beneficial
Landscape Character							
Character of the Site	Medium	Medium	The Site consists of meadow grassland and is surrounded by well vegetated boundaries, although gappy in places. Wooded horizons, often wooded Hills, enhance the character of intimate wooded enclosure. Neighbouring residential dwellings and the audible M5 connect the site to the developed vale it sits within. There are no landscape designations covering the Site.	Medium	Construction	Medium Negative	Moderate Adverse
					Completion Year 1	Medium Negative	Moderate Adverse
					Completion Year 15	Low Negative	Minor Adverse
Character of Sneedham's Green	Medium	Medium	Sneedham's Green common consists of meadow grassland and is open to the eastern and western boundaries, defined by Winnycroft Lane to the east and Wysis Way to the west. To the south western boundary are mature trees and hedgerow to gardens of existing properties, and to the north, again mature clumps of trees to garden boundary of existing properties. Residential dwellings are dotted around the Green and the M5 is very audible. The Proposed Development will retain, protect and enhance the SM, with new residential development forming a U shape around it, protecting it within a new area of open green space.	Medium	Construction	Medium Negative	Moderate Adverse
					Completion Year 1	Medium Negative	Moderate Adverse
					Completion Year 15	Low Negative	Minor Adverse
The Character of the Vale of Berkeley LCA	Medium	Medium	Key characteristics of the Vale of Berkeley include: <i>'a large scale, gently undulating landscape but with extensive almost flat areas commonly lying between the undulations.'</i> <i>'Views towards the escarpment and Rolling Hills and Valleys landscape type give a distant sense of enclosure in many areas of the vale and the Robins Wood Outlier and Hockley Hill both form prominent elevated landmark features when viewed from the northern portion of the vale.'</i> <i>'Settlement forms a strong influence on the overall character of the Vale of Berkeley with views towards built form commonly occurring in the wider landscape'</i> <i>Development proposals would be consistent with surrounding residential settlement, abutting existing settlement edge.</i>	Medium	Construction	Medium Negative	Moderate Adverse
					Completion Year 1	Medium Negative	Moderate Adverse
					Completion Year 15	Low Negative	Minor Adverse
The Character of Robins Wood Hill LCA	Medium	Medium	Robins Wood Hill, located on the south eastern perimeter of Gloucester is the southern of the two Escarpment Outliers located within the Severn Vale Study Area, and also the highest, rising to a height of 198m AOD. Key characteristics of Robins Wood Hill include: <i>'Distinctive isolated hills detached from the main Cotswolds escarpment, rising above the neighbouring vale; Woodland and tree belts, often located on steeper slopes form interlocking patterns with hedgerows; Panoramic views possible from upper slopes towards the Cotswolds Escarpment, Severn Vale and Forest of Dean.'</i> The intrinsic character of the outliers is derived from their pronounced relief, woodland cover and field boundaries, which combine to give a strong sense of unity and visual integration. ...some outliers support notable stands of broadleaved woodland as in the case of both Chosen and Robins Wood Hills. Some detractors such as Golf Course and Dry Ski Slope.	Medium	Construction	Negligible	Negligible
					Completion Year 1	Negligible	Negligible
					Completion Year 15	Negligible	Negligible

Receptor	Value	Susceptibility	Description	Sensitivity	Development Phase	Magnitude of Change size/scale: extent:	Scale of Effect
The Settlement Character of Matson	Medium	Medium	Matson forms a small suburb of the city of Gloucester situated in the Vale of Gloucester, at the southern end of the Vale. It is served by the B4073 Painswick Road and some local Lanes, with the M5 to the south east, accessible further to the north and south. The suburb itself is predominantly residential semi detached or terraced houses, typically dating from the post war housing boom era. There are small pocket greens dotted regularly throughout the housing estates, with local school, pharmacy and shops, set within a well vegetated landscape, with a wooded, intimate and enclosed character.	Medium	Construction	Low Negative	Minor Adverse
					Completion Year 1	Low Negative	Minor Adverse
					Completion Year 15	Negligible	Negligible
Designations							
The character of Cotswolds AONB	High	High	Key characteristics of Settled Unwooded Vale (AONB) include: 'Soft rolling or gently undulating landform, with the Cotswolds Escarpment defining the eastern limit of the Vale and providing a dramatic backdrop to vale settlements and landscapes; Rural areas bordered by large urban and suburban areas and interspersed with commercial and industrial uses indicating the close proximity of large urban centres and major transportation links.' The Site comprises a large agricultural field with central moat, situated in the relatively flat vale. The Cotswold AONB is located immediately east of the M5 which borders the proposed Site. The Site therefore forms part of the setting to the AONB. The key landscape features and components are retained as part of the development proposals. Due to local topography, settled and well vegetated nature of the Vale, wooded upper slopes and hilltops, the Site is typically not discernible from the AONB.	High	Construction	Negligible	Minor Adverse
					Completion Year 1	Negligible	Minor Adverse
					Completion Year 15	Negligible	Minor Adverse
Scheduled Monument 'Moated site at Sneedham's Green	High	High	To the centre of the Site lies the moat Scheduled Monument and an area of scrub. It is worth noting that during construction of the M5 motorway, much of the Site was covered with fill material. The proposals constitute a permanent change. The Proposed Development will retain, protect and enhance the SM, with new residential development forming a U shape around it, protecting it within a new area of open green space. Following the Heritage Assessment and investigations of buried material, the moat has been confirmed as <i>not</i> being medieval in origin.	High	Construction	High Negative	Major Adverse
					Completion Year 1	High Negative	Major Adverse
					Completion Year 15	High Negative	Major Adverse

5. VISUAL ASSESSMENT

5.1 Background

5.1.1 The original LVIA Rev B has been reviewed along with all other plans and documentation, by Peter Quinn, Landscape Consultant for Gloucester City Council and Simon Joyce, Planning Officer for the Cotswold Conservation Board for the Cotswold Area of Outstanding Natural Beauty.

5.1.2 This section addresses the comments on Visual Amenity, with the original comments set out, followed by the response, and accompanied by updated information as appropriate.

5.2 Potential Visual Impact;

5.2.1 Cotswold AONB Planning Officer (AONB Officer) Comments: The AONB Officer states 'It is regrettable that the LVIA's photoviewpoints appear to be taken in summer, when vegetation is in leaf, contrary to accepted best practice. As a result, the three viewpoints within the AONB that are in proximity to the site (nos. 11, 12 and 17) show the site is obscured by vegetation, though this is potentially aided by the fact that the trees are in full leaf. Given the LVIA is dated June 2021 and now more than a year old, there would have been an opportunity to update the photo viewpoints over the winter when vegetation was not in leaf and this would have better illustrated a 'worst case scenario'.'

5.2.2 Response: The field survey was taken in June 2021, summer months representing best case scenario in terms of extent of visibility, with winter months representing worst case scenario. This is made clear within the Limitations and Assumptions of the Assessment at paragraph 2.6.1 and again within the Visual Assessment section on Representative Views at paragraph 6.3.2. The LVIA methodology at 2.4.14 also states 'As such all views and visual amenity are best experienced in the field.'

5.2.3 It is considered that the multiple layers of mature dense vegetation, including field boundaries and mature dense vegetation either side of the M5 motorway, curtailing the views in VPs 11, 12 and 17, are more than sufficient to screen the Site from view even through winter months, and it is considered that the Site would still be screened and at worst case heavily filtered from view during winter months. The dense mesh of branches of existing vegetation would be further enhanced by buffer vegetation along the bund to the eastern boundary of the proposed development Site.

5.2.4 Cotswold AONB Planning Officer (AONB Officer) Comments: The AONB Officer notes 'that the location of the site is not even indicated in some of the photoviewpoints, for example in photoviewpoint 18 which is the key view from Painswick Beacon, one of the major viewpoints on the Cotswold escarpment and the junction of the Cotswolds Way National Trail and Wysis Way, let alone its extent shown'

5.2.5 They continue to confirm 'the site is likely to either be (at least partially) screened by vegetation or hidden by intervening landform when viewed from public locations within the AONB, including from on the Escarpment and High Wold.'

5.2.6 Response: Viewpoint 18, the location of the Site is clearly illustrated on the accompanying map, the Site itself cannot be seen, and is in fact just below the Golf Course and hidden by locally raised landform, as described within the text description of the view. This clearly illustrates in this key view from Painswick Beacon that the Site and Proposed Development will have no effect on the view.

5.2.7 As noted, in views out from the AONB, the AONB Officer confirms the findings of the LVIA in that the Site is screened in the majority of views by vegetation or hidden by intervening landform when viewed from public locations within the AONB.

5.2.8 Cotswold AONB Planning Officer (AONB Officer) Comments: The AONB Officer states 'As far as assessing the potential impact on views towards the AONB is concerned, viewpoints 6, 1 and 9 in the LVIA are probably the best representative views of the AONB from Robinswood Hill and close to the site respectively.'

5.2.9 The AONB Officer continues 'Whilst the approximate extent of the site is shown in viewpoint 6, there are no vertical arrows to identify it, though it is noted within the accompanying text that the site is the yellow field in the middle distance. The accompanying description of the view makes no reference to the expansive views of the AONB which can be achieved in this location.'

5.2.10 'In this view, the urbanised southern edge of Gloucester and even the new and allocated development at Winneycroft are, and would be, obscured by the topography. Therefore, the proposed development may appear as an isolated and incongruous urban addition in the foreground of the AONB, a point not considered by the LVIA's analysis. Notwithstanding the omission of a consideration of the development of this site within the setting of the AONB in views to the escarpment which is a 'special quality' of the CNL, the LVIA still concludes that there would be a 'major' adverse impact on this view during construction and at completion, reducing to 'moderate' adverse by year 15. Such an impact is significant in EIA terms and as outlined above, may not be compatible with the requirements of paragraph 174 of the NPPF that development should contribute to and enhance the natural environment by protecting and enhancing valued landscapes in a manner commensurate with their statutory status.'

5.2.11 'Although not considered by the LVIA, the issue of impacts on views towards the escarpment on the setting of the AONB would also apply to views achieved at viewpoint 9 across Sneedhams Green Common Land. Again, the development is considered as having a 'major' adverse visual impact in this location, which comprises a view of the site in the foreground of the AONB escarpment.'

5.2.12 Response: The LVIA at Viewpoint 6 – makes reference to wooded hills to the horizon and the view itself clearly shows the extent of the view. In reference to the Proposed Development at Year 1 clear reference is made to the fact that; 'The development will be clearly visible and recognisable but not dominant in views, set within a well vegetated landscape, the wide landscape towards the hills opposite being the focus of the view.'

5.2.13 It is considered that the perception of the proposed development Site would not be considered as a settlement in isolation, as the receptor would have likely travelled up Robins Wood Hill from the settled vale landscape therefore not unaware of and in the knowledge of the existing areas of settlement, as currently already exists around the lower slopes of the outlier Hill. The LVIA also highlights in the view afforded from Robins Wood Hill out towards the AONB escarpment, the M5 motorway services, and although not noted, the Brookthorpe Motocross Track is also clearly visible.

5.2.14 The sensitivity is noted as HIGH for both Viewpoints 6 and 9. When read in conjunction with Table B2 within the LVIA Appendix, this correlates with High Value and Susceptibility, an area of high scenic value, including amongst others AONB, and users of rights of way and recreational trails. It is incorrect therefore to state that the LVIA has not considered the perception of the development as 'incongruous' nor having considered the location and setting of the AONB.

5.2.15 Both Viewpoints 6 and 9 the land rises up beyond and behind the Site and will remain as the horizon line should the Site be developed as proposed. The development will bring about change, but the development has been carefully considered and designed to ensure it is not dominant in views and that the AONB remains as the backdrop to the wider view, as it is described within the LVIA paragraph 5.3.5 and 'Views towards the escarpment and Rolling Hills and Valleys landscape type give a distant sense of enclosure in many areas of the vale and the Robins Wood Outlier and Hockley Hill both form prominent elevated landmark features when viewed from the northern portion of the vale.'

5.2.16 LPA Landscape Officer Comments: The LPA Officer states the Site 'is clearly shown in the photograph below taken within the AONB from PRoW EUL20. The yellowish field in the centre of the image is the site, the line of trees just below the centre is the line of the M5 and the hill in the middle distance is Robinswood Hill'

5.2.17 Response: The Site and surroundings have since been revisited, with a series of photos taken from the identified location, to create a panoramic view, all in accordance with the Landscape Institutes Technical Guidance Note to ensure the horizontal and vertical field of view is accurately represented. This is then illustrated as a photomontage with the proposed development at Year 1 post completion and at Year 15 post completion, to provide a representation of the likely view. Refer to pages 13 and 14 below for view, photomontages, view description and significance of effect.

5.2.18 LPA Landscape Officer Comments: The LPA Officer states, 'the Snow Capel development proposes the construction of a housing estate well beyond the rural fringe of the city described in the statement and clearly impacts on the views into Robinswood Hill and the AONB.'

5.2.19 Response: The development proposals have been carefully and sensitivity landscape and heritage led, with the Site being visible from only one viewpoint within the AONB. The set back of built form from around the heritage asset and retention and enhancement of vegetated boundaries retains the key landscape components and visual connections across the site to the surrounding landscape.

- 5.2.20 LPA Landscape Officer Comments: The LPA Officer states, 'The development of the site is clearly visible from PRowS within the AONB less than 400m from the site. The proposals do not have regard to the scenic quality of the location and clearly do not conserve or enhance views into and out of the AONB.'
- 5.2.21 Response: As previously mentioned there is only one view, from the many representative viewpoints already demonstrated, where the Site is visible from the AONB. And at 400m, this is a near distance viewpoint. Typically those receptors within the near distance locations are those that are likely to experience the greatest level of change due to their proximity to the proposed development Site.
- 5.2.22 As stated, the proposals for this Site have involved a fully landscape and heritage led iterative design approach, as demonstrated by the resultant development layout, with retained vegetative boundaries except for access, bund and vegetative buffer to the M5 which also helps to reduce visual impact to the east, retention of large central open space surround SM moat, and also retaining visual links to Sneedhams Green and views beyond. Trees are regularly spaces within the development and amongst the dwellings retaining and enhancing green links across the Site.
- 5.2.23 LPA Landscape Officer Comments: The LPA Officer states, 'It should be noted that removal of lengths of hedge to create views between the proposed housing estate and Sneedhams Green will not be supported in landscape terms. ... removing sections, or all, of the hedge to allow views of a prominent new housing estate would clearly have an adverse effect on views from Sneedhams Green towards the AONB.'
- 5.2.24 Response: Boundary vegetation is to be retained, with the exception of the Highways access points as required. This is demonstrated in the Landscape Masterplan and the Site has been assessed as such.
- 5.2.25 LPA Landscape Officer Comments: The LPA Officer states 'Visual receptors are described in GLVIA3 as "people who will be affected by changes in views or visual amenity". The visual receptors listed in paragraph 6.2.2 (page 26) of the submitted LVIA do not specifically include the non-resident users of Sneedhams Green. The Green is Open Access Land (as defined by the CROW act 2000) and is open to, and used by, members of the public. Should the development go ahead, with the site's western boundary hedge retained, then this would adversely affect views across and from the Green. Should the hedgerow be removed in whole or in large sections, then this could have a much greater adverse effect on such views. Users of the Green are mentioned in the discussion of viewpoint 9 but it is not clear whether due emphasis is given to such users given that this is their only specific mention.'
- 5.2.26 Response: Viewpoint 9 is listed as High sensitivity, the highest possible rating within this LVIA assessment. In reference to LVIA Appendix Table B2, the LPA Officer may note that 'High' Value and Susceptibility may include views from tourist destinations and users of public access land amongst others. Receptors are listed, including 'users of Sneedhams Green'. Significance is Major during construction and Yr 1 phases of development, dropping to Moderate by Yr15. Therefore it is surprising that this is deemed not to have been assessed.
- 5.2.27 LPA Landscape Officer Comments: The LPA Officer states, 'There are very clear, relatively close (c.400m) views of the site from the very well-used footpath EUL20 within the AONB. It is not clear why this has not been included in the representative views especially given the stated parameters for choosing viewpoints and given that the view between the AONB and Robinswood Hill is considered by many in the area as iconic.'
- 5.2.28 Response: It is acknowledged that the view was missed. Many others have been captured from the AONB and demonstrate no change in view. The Site has been revisited and this viewpoint has been assessed and addressed within this Addendum.
- 5.2.29 LPA Landscape Officer Comments: The LPA Officer states that for Viewpoint 1, 'The description relating to viewpoint 1 (page 28) describes the western boundary hedgerow as "intermittent small trees and shrubs"... It is described as a hedge or hedgerow in many other parts of the submission including the Arboricultural Impact Assessment which shows the majority of the boundary as being formed by hedges or groups of trees. "Intermittent small trees and shrubs" is thus a strange way to describe this hedge and suggests something less than a hedge. This is far from the case. The hedge would be better described as almost continuous.'
- 5.2.30 'Viewpoint 1 is taken very close to the hedge along the western boundary and downplays the prominence of the escarpment of the AONB which rises beyond the M5. This is apparent when it is compared with the above photograph and that of viewpoint 9.'
- 5.2.31 'The magnitude of change 15 years after completion is described for viewpoint 1 as "Over time strategic green infrastructure will mature, such as the hedgerows and trees to boundaries. This will screen and soften views of the development. In the long-term there are likely to be partially screened views of the development from this viewpoint." This statement is misleading: firstly the "hedgerows", presumably that along the western boundary, is mature and will not grow much or provide much more screening than it at present offers, without being reinforced in some way. The Proposed Site Plan shows 6 new trees planted along or near to the western boundary hedgeline and no other new planting, so it is difficult to understand how strategic green infrastructure will further soften views of the development in any meaningful way.'
- 5.2.32 'The LVIA concludes that 15 years after development the magnitude of change would be low negative and the significance would be minor adverse. This seems overly optimistic. The magnitude of change and significance would be likely to be much greater.'
- 5.2.33 Response: Viewpoint 1 clearly demonstrates intermittent state of the boundary vegetation.
- 5.2.34 Viewpoint 1 is taken at 24m from the Site boundary, as set out in the table details accompanying the panoramic view. Viewpoint 9 is taken 150m from the Site boundary. Both are taken in accordance with the LI Tech Note guidance on photography, which is notably lacking on the View often referred to by the LPA Officer. Thus the prominence of the escarpment will of course be experienced differently, from different viewpoints.
- 5.2.35 It is inconceivable that a description of 'mature' vegetation would lead to the belief that it will stop growing, or not provide much more screening than presently offered. Against the British Standard 5837, if a tree is described as mature it equates to having reached its ultimate height, but still has 50% of its life, as an example an oak tree can live for hundreds of years. Trees or shrubs forming a hedgerow, if maintained at a certain height will continue to grow and thicken and can be described as a mature hedgerow with the true understanding of continual growth. This demonstrates a lack of understanding of basic plant knowledge and then also the application of the knowledge in forming judgements upon magnitude of change into the future phases.
- 5.2.36 At Yr15 the overall composition of the view remains, with development set back from the SM moat, vegetation along Winnycroft Lane and the rising escarpment beyond. The proposed development would therefore be settled within a well vegetated landscape by Yr15.
- 5.2.37 LPA Landscape Officer Comments: The LPA Officer states that for Viewpoint 9, 'I strongly disagree with the conclusion that 15 years after development, the magnitude of change from viewpoint 9 would be low negative and the significance moderate adverse. The view would change from one that is at present largely green, rural and very pleasant to one which would feature a housing estate only partially screened or almost not screened at all, depending on which version of the landscape proposals is actually proposed.'
- 5.2.38 Response: The overall composition of the view remains, with mature trees surrounding Sneedhams Green, along Winnycroft Lane and the rising wooded escarpment beyond. In the long-term there are likely to be partially screened views of the development along the western boundary, as stated within the LVIA at Yr15.
- 5.2.39 LPA Landscape Officer Comments: The LPA Officer makes reference to the Visual Effects summary at paragraph 6.5.2 of the LVIA and states that for Viewpoint 6, 'This statement appears to be offered instead of a careful analysis of the actual effect on each view. It is incorrect in a number of ways. The boundary vegetation along the western boundary of the site will not "provide a good level of filtering and screening during winter months". In many places it will offer a poor level of screening in winter especially in west facing views from Sneedhams Green and associated footpaths and roads. In the view from the golf course (viewpoint 6) few evergreens are discernible in the photograph.'
- 5.2.40 The LPA Officer continues 'Given the size of the proposed development and its potential for adverse effects, the need for a study of the site and its setting in winter appears obvious.'
- 5.2.41 'The statement that after 1 year "the wide landscape towards the hills opposite" would be the focus of the view is rather wishful thinking. The proposed housing estate would be prominent, especially in winter and especially given that after 1 year, planting would not only be almost invisible from Robinswood Hill but would not even offer the "minimal softening and screening" suggested.'
- 5.2.42 The LPA Officer states 'I strongly disagree with the conclusion that 15 years after development the magnitude of change from viewpoint 6 would be low

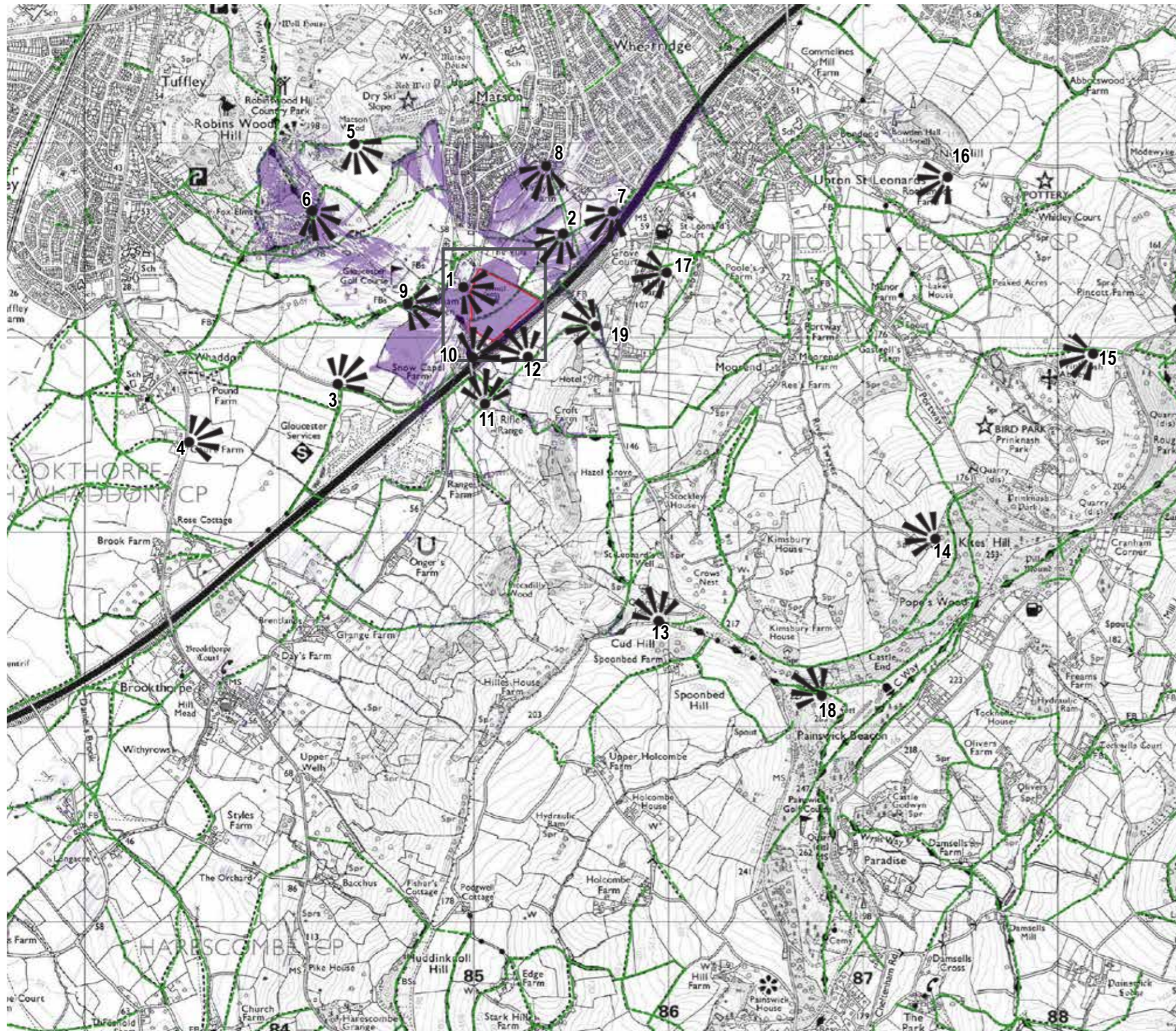
negative and the significance would be moderate adverse. The development would cause a break in the almost continuous rural corridor currently apparent in views between Robinswood Hill and the AONB and the adverse effect on views would be marked.'

- 5.2.43 Response: The LVIA Viewpoint 6 **does** provide detailed commentary on the viewpoint. The comments from the LPA Officer seem to be conflating many elements and does not clarify perceived issues, merely confuses.
- 5.2.44 Whilst winter aids worst case scenario for assessment, the LVIA assessment is assessed professionally and it does not mean that assessments that happen to fall in the summer time can be disregarded, even though they may present the best case scenario in terms of existing vegetative screening afforded from deciduous species within the photographic presentation.
- 5.2.45 The LVIA clearly states that Viewpoint 6, Yr1 planting is acknowledged as being minimal and that built form will have greater influence. Given the elevation of the view and the wide extent of the view, it is **not** untrue to understand the experience of the receptor as taking in the view to the AONB escarpment, in the full knowledge that this area is well known for the views of wooded hills and settled vales.
- 5.2.46 As stated previously, it is considered that the perception of the proposed development Site would not be considered as a settlement in isolation, as the receptor would have likely travelled up Robins Wood Hill from the settled vale landscape therefore not unaware of and in the knowledge of the existing areas of settlement, as currently already exists around the lower slopes of the outlier Hill. The LVIA also highlights in the view afforded from Robins Wood Hill out towards the AONB escarpment, the M5 motorway services, and although not noted, the Brookthorpe Motocross Track is also clearly visible.








5.3 Visual Effects

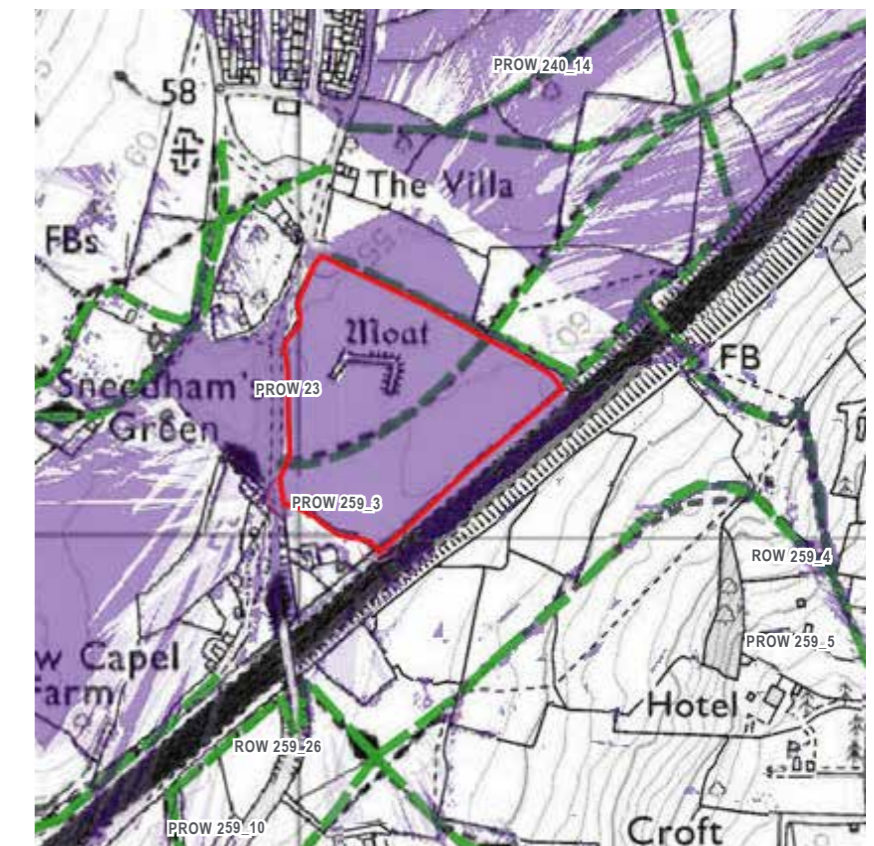
- 5.3.1 LPA Landscape Officer Comments: The LPA Officer states '*The summary of visual effects (p.46) appears to imply that visual impact can be quantified by adding up how many views had no significance of effect in 15 years and then comparing the total with those that did. Of the 18 viewpoints selected, 15 did not have any view of the site and these, as might be expected had no significance of effect. This is not a valid approach as any number of viewpoints from which the site could also not be seen could have been selected. The selection of viewpoints in this LVIA is clearly flawed, as a number of the most important views of the site were not included or properly assessed. "Of the eight viewpoints from within the AONB, none experience any change in view" (paragraph 6.5.7). The good news from the 8 viewpoints that couldn't see the site is clearly eclipsed by the bad news from the one that was not selected that has a very clear view of the site.'*
- 5.3.2 The LPA Officer continues '*Views from the AONB, from Robinswood Hill and from Sneedhams Green have not been properly considered and the likely adverse effects have certainly not been mitigated in any consequential way. In the case of the AONB this is because the LVIA didn't include relevant and clear views from the AONB.'*

- 5.3.3 Response: The Viewpoints were selected following initial ZTV analysis by GIS computer program, then verified and refined during the field survey. The Viewpoints represent a wide sweep of near, medium and long distance views 360 degrees around the Site and for a variety of receptors. In accordance with GLVIA3, paragraph 6.19 and 6.20.
- 5.3.4 One viewing point from a wide selection of viewing points taken from with the AONB and the surrounds, does not eclipse the majority of views. In accordance with the GLVIA3, the clear facts about the Site location, in that it is well hidden in the majority of views, and using proportionality in the assessment, a clear guideline of the GLVIA3, the LVIA stands as a robust assessment.
- 5.3.5 LPA Landscape Officer Comments: The LPA Officer states '*It would appear from the evidence that the very nearest view has the lowest adverse effect of any of the viewpoints that can actually see the site. This needs explanation as it does not make sense in its current form.'*
- 5.3.6 Response: There are two near distance views that experience adverse effects and one middle distance view. Including the recently assessed view, 3 near distance views experience adverse effects. The LVIA is correct in its summary statement to say that near distance, those in closest proximity to the Site, will experience the greatest changes in view. It is not contradictory, it is context.



KEY

-  Site Boundary
-  Representative Viewpoints
-  Inset A for PROW's
-  Primary Visual Envelope
-  Secondary Visual Envelope (Glimpsed views)
-  PROW Footpath
-  PROW Bridleway



Inset A: PROW's associated with Site.

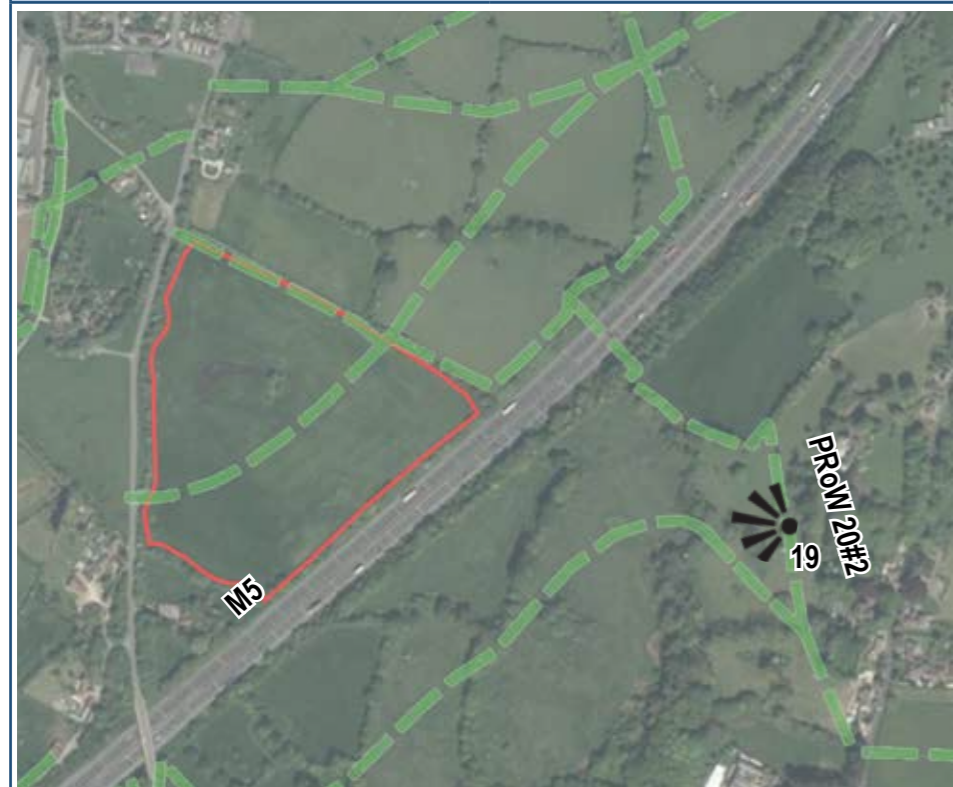
Figure 10: Visual Analysis and Locations of Representative Views.
 Source: Ordnance Survey Crown Copyright 2022. All rights reserved. License Number 100022432





VIEWPOINT 19

View towards the Site from PRoW UPTON ST LEONARDS FOOTPATH 20#2 looking west, located within the Cotswolds AONB



Source: Ordnance Survey Crown Copyright 2019. All rights reserved. License Number 100022432

Distance from site: 330m	Viewpoint height (AOD): 120m
OS grid reference: 385655, 214079	
Camera make + model: Nikon 3500	Date of photograph: 04.11.22

	Description of View	Magnitude of Change		
		Construction	Completion Year 1	Completion Year 15
SENSITIVITY: HIGH	<p>Taken from Upton Hill looking west looking towards the Site. From this elevated position views are afforded into the Site beyond the M5 vegetated corridor, along with the settled Vale of Berkeley geological feature of Robins Wood Hill. Long distance views extend out over the Vale of Gloucester, with the Cathedral just visible on the horizon line in the far distance. The hills and vales are a distinctive landscape, often wooded hilltops and well vegetated vales.</p> <p>Receptors</p> <ul style="list-style-type: none"> Users of PRoW UPTON ST LEONARDS FOOTPATH 20#2 (EUL20 part 2) 	<p>In the short term, there will be disturbance of existing ground levels arising from removal/ storage of topsoil and excavation for foundations, access driveway, and services. There will be clear views of construction activities across the Site.</p> <p>The magnitude of change will be Medium Negative.</p>	<p>The development will be clearly visible and recognisable but not dominant in views, set behind a bund with woodland buffer and beyond mature vegetated edges to the M5. Robins Wood Hill remains as the distinct feature within the wider landscape. Initially the landscape mitigation will provide minimal softening and screening effects and so built form will have greater influence.</p> <p>The magnitude of change will remain Medium Negative.</p>	<p>Over time strategic green infrastructure will mature, such as the bund and woodland buffer along the eastern boundary to the M5. Protection of the central Moat SM will provide a centre green focal area, with built form set around it to the north, east and south. In the long-term there are likely to be partially screened views of the development.</p> <p>The magnitude of change will decrease to reach Low Negative.</p>
SIGNIFICANCE		MAJOR ADVERSE	MAJOR ADVERSE	MODERATE ADVERSE

Viewpoint 19 - AVR Type 2 Visualisation of built form



Viewpoint 19 - Year 1 Visualisation



Viewpoint 19 - Year 15 Visualisation



5.4 Summary of ZTV

- 5.4.1 Overall, as stated within the original LVIA, the Zone of Theoretical Visibility, or Influence (ZTV), the area from within which the proposed development may have an effect, is relatively contained and does not extend across the majority of middle or any long distances. Located within a gently undulating vale landscape with well vegetated boundaries, and wooded hilltops to the Hills and escarpment of the Cotswolds AONB, views are restricted to near distances in the majority. Where longer distance views are afforded, they are from elevated positions, with layers of vegetation aiding screening and softening. Of the nine viewpoints from within the AONB, only one experiences effects from the development, the rest experiencing **no** change in view. Refer to the updated Table 3 as extracted from the LVIA and including Viewpoint 19.
- 5.4.2 The spatial layout of development areas, retention of vegetated boundaries except for access points, open space and strategic green infrastructure, as well as existing features to be retained such as the central moat SM within its own large green open space, has been designed to complement and respect the character and context of the settlement and the surrounding countryside.
- 5.4.3 New structural planting will soften views of the proposed development from the surrounding landscape and road network. As planting matures the magnitude of change will decrease, ensuring effects of proposed developed reduce by Year 15.
- 5.4.4 Following the completion of the Proposed Development the greatest levels of effects will still be experienced by those receptors in close proximity to the Application Site. Such effects have been mitigated by the design of the Proposed Development in conjunction with planting, which over time will become established and help to integrate the built form into the surrounding landscape.

Table 3 - Summary of Visual Effects

Viewpoint	Distance of View	Significance of Effect Post Completion 15 Years
1	Near	Minor Adverse
2	Near	None
3	Middle	None
4	Long	None
5	Middle	None
6	Middle	Moderate Adverse
7	Middle	None
8	Middle	None
9	Near	Moderate Adverse
10	Near	None
11	Near (view from AONB)	None
12	Near (view from AONB)	None
13	Long (view from AONB)	None
14	Long (view from AONB)	None
15	Long (view from AONB)	None
16	Long (view from AONB)	None
17	Middle (view from AONB)	None
18	Long (view from AONB)	None
19	Near (view from AONB)	Moderate Adverse

6. SUMMARY AND CONCLUSIONS

6.1 General Comments

- 6.1.1 LPA Landscape Officer Comments: The LPA Officer states, in reference to the DAS, 'the DAS goes on to state, "in landscape terms there are no overriding landscape or visual effects that should prevent the development of the Site as proposed". This is not true. The above statements appear to be derived from the conclusions of the LVIA which accompanies the application. The LVIA will be discussed in detail in a separate section,... which will lay out the reasons for refuting the idea that the change can be fully mitigated, and that there are no landscape effects that prevent this development.'
- 6.1.2 Response: The LVIA does **not** conclude that there will be no effects as a result of the proposed development. It expressly states that any development will give rise to change in the landscape of an area and the views of receptors. (section 8.5 paragraph 8.5.1).
- 6.1.3 The majority of residual landscape effects are concluded as ranging from Minor Adverse to None (section 8.3, paragraph 8.3.1). Visual effects are summarised by explaining that typically the greatest level of visual effect will be experienced by those receptors within the near distance. (paragraph 8.3.3) At Section 6.3, Table 3 demonstrates the range of residual visual effects ranging from Moderate Adverse to Minor Adverse to None.
- 6.1.4 At **no point** does the LVIA state that the proposed development can be fully mitigated. It is clear however, following the findings of the assessment, that as stated, there are **no overriding** effects in landscape character or visual amenity, that should prevent development as proposed.
- 6.1.5 LPA Landscape Officer Comments: The LPA Officer states, '8.3.2 implies that there is only one view beyond the near distance that has a view of the site. This is empirically not true.'
- 6.1.6 Response: The LVIA remains correct in its statement as mentioned. The revisited Viewpoint 19 is 330m distance from the Site boundary as measured, and, as set out within the LVIA at 6.5.1, is therefore classified as a NEAR distance view.

- 6.1.7 LPA Landscape Officer Comments: The LPA Officer states, '8.3.3 states that adverse effects will be "mitigated by the design of the Proposed Development in terms of the area to be developed and the area to preserved as open space, in conjunction with planting". The proposed landscape is unlikely to offer much mitigation to views or landscape. In particular, views from Robinswood Hill, Sneedhams Green and the AONB would be changed from predominantly green and rural to ones with a housing estate featuring prominently or very prominently.'
- 6.1.8 Response: The LVIA remains correct in its statement as mentioned. The development proposals recognise the importance of the SM moat and the visual connections from it to Sneedhams Green, with landscape proposals complementing this by not screening it off entirely, as this would be inappropriate in retaining the historical context. The development abuts existing settlement edge, in the Vale of Berkeley which is described as settled vale. In all the views the LVIA has assessed and that are taken from the AONB, only one has views afforded of the Site. The Site is well screened by existing topography and vegetation and thus will not intrude on areas of open landscape, typically found to the south of Robins Wood Hill. The Site nestles against existing settlement, whilst preserving archaeological features and does not adversely affect the wider rural landscape and views to and from the AONB. The Site **is therefore meeting** many of the AONB Strategies and Guidelines for new development.

6.2 Summary of Landscape Effects

- 6.2.1 As demonstrated by the LVIA for this Site, this has been a truly landscape and heritage led masterplan, for a Site that is relatively well contained by existing topography and vegetation, abuts existing residential settlement and the M5, in an established settled vale, with minimal effect on neighbouring AONB or Robins Wood Hill.
- 6.2.2 Land use of the site, and hence character, will alter as a direct result of development of the Site. However the Site itself abuts existing residential edge of settlement, is relatively contained by mature trees and shrub boundary vegetation. The majority of the residual landscape effects are considered to be **Minor Adverse**.

6.3 Summary of Visual Effects

- 6.3.1 As demonstrated by the LVIA for this proposed Site, it is remarkably well visually contained and screened by existing vegetation and topography, especially when given the potential for elevated views from both Robins Wood Hill and the AONB escarpment.
- 6.3.2 Of the 19 views taken from the publicly accessible points around the Site, only Viewpoints 6, 9 and 19 are considered as having Moderate Adverse residual effects, one Viewpoint considered as having Minor Adverse, the rest being None, or No effect from development as proposed.

6.4 Final Conclusion

- 6.4.1 As stated in the original LVIA, it is acknowledged that any development will give rise to change in the landscape of the area and the views of receptors. The degree of change will influence the judgement on acceptability and will need to be balanced with the overall benefits delivered by the scheme.
- 6.4.2 Although there will be localised visual and landscape effects, the sensitively considered and designed layout, strategic landscape infrastructure, areas of retained open space and enhancement of existing vegetation, along with new internal development planting will help to visually integrate the development into the surrounding landscape.
- 6.4.3 When balanced against the strategic AONB guidelines of it being preferable to develop against existing settlement edges, and the lack of visibility of the Site, it is considered that this Site can be successfully mitigated and developed as proposed.
- 6.4.4 In conclusion, this Addendum and Rebuttal confirms the LVIA findings, that in landscape terms there are no overriding landscape or visual effects that should prevent the development of the Site as proposed.

James Blake Associates Ltd • Chartered Landscape Architects

34 - 52 Out Westgate, Bury St Edmunds, Suffolk, IP33 3PA
tel. 01284 335797 e-mail. jamesblake@jba-landmarc.com



HERITAGE INTERPRETATION BOARD



Pitches proposed as part of adjacent development

PROPOSED LANDSCAPE AREAS



TREE PALETTE

Native Focal Trees such as *Acer campestre*, *Betula pendula* and *Carpinus betulus*.

Street Trees such as *Acer campestre* "Streetwise" and *Carpinus betulus* "Frans Fontaine"

Ornamental Trees such as *Pyrus calleryana* "Chanticleer" and *Prunus* "Amanogawa"



Betula pendula



Acer campestre "Streetwise"



Pyrus calleryana "Chanticleer"

Soft Landscape

- Existing Vegetation
- Proposed Ornamental Shrub Planting
- Proposed Ground Cover Planting
- Proposed Ornamental Hedge Planting
- Proposed Native Buffer Planting
- Proposed Native Hedge Planting
- Amenity Grass to Public Open Space Areas
- Back Garden Grass
- Plot Frontage Grass
- Mown Path
- Wildflower Meadow Grassland
- Proposed Planted Acoustic Bund
- Area of Retained Vegetation
- SuDS - Sustainable Urban Drainage System

Hard Landscape

- Tarmac Paths
- Proposed Road and Parking Space Tarmac Surfacing
- Proposed Block Paving to Shared Surfaces and Private Drives
- Timber Post and Split Rail Fencing
- Slab Paving
- 3m High Acoustic Fence

Streetscape Items

- Picnic Table
- Heritage Interpretation Board
- Finger Post
- Naturalistic Play Items

Rev.	Date	Initials	Comments
C	16.12.2022	AJW	Amended to latest layout
B	13.05.2022	CR	Amended to client comments
A	10.05.2022	CR	Amended to client comments

Site: Snow Capel, Matson, Gloucester Drg Number: JBA 21/169- SK01

Client: Edward Ware Homes

Drawn by: HNG Date: APRIL 2022 Scale: 1:1000@A1 Rev: C