



6 The Courtyard
Hatton Technology Park
Dark Lane
Hatton
Warwickshire
CV35 8XB

Peter Twemlow
DP9 Ltd
100 Pall Mall
London
SW1Y 5NQ

E: info@bradleymurphydesign.co.uk
W: www.bradleymurphydesign.co.uk
T: 01926 676496

By Email

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Our ref: BMD Response to Comments from ALD on behalf of CPC – 07.02.20

Great Wolf Resort, Bicester **BMD Response to Comments from ALD on behalf of CPC**

Dear Peter,

The following outlines our response to the comments provided in correspondence of 23rd January 2020 by Applied Landscape Design (ALD) to Clare Whitehead, specifically their review of the LVIA and Landscape Design (following their appointment by Chesterton Parish Council (CPC)) that accompanied application 19/02550/F for the Great Wolf Resort, Bicester.

ALD Review of Landscape & Visual Impact Assessment (LVIA)

ALD infer that the LVIA was carried out in accordance with, now superseded, 2011 guidelines. This statement is incorrect. As noted in the Methodology at Appendix 13.1, paragraph A.2.1, the LVIA is carried out in accordance with the current Guidelines for Landscape & Visual Impact Assessment, Third Edition (GLVIA3), 2013 (LI & IEMA), with photographs and AVRs (Accurate Visual Representations - wirelines and photomontages) undertaken in accordance with Landscape Institute Technical Guidance Note 06/19, Visual Representation of Development Proposals (2019).

It must be noted that, in his correspondence to Clare Whitehead on 28th January 2020, Tim Screen (Cherwell District Council (CDC) Landscape Officer) confirmed that, in his opinion:

“The LVIA is a comprehensive and competently written document that complies with the GLVIA3 Guidelines”

ALD also raise concerns over the scoping process and whether the Landscape Officer assisted in defining the receptors for the LVIA, along with querying the location of various viewpoints and AVRs used to inform the LVIA. BMD can confirm that Tim Screen was consulted as part of the EIA Scoping process and met with BMD and the project team during a number of Pre-Application meetings, with extensive discussions to determine the suitable location of viewpoint photographs and AVRs.

As part of the above, Tim Screen was integral in the selection of viewpoints (including those required for AVRs included in LVIA Appendices 13.8 and 13.9). A number of viewpoints were specifically requested by Tim Screen, including Viewpoints 13, 14b, 16, 17 & 18 (queried by ALD as private locations). BMD sought permission from relevant landowners to obtain photographs from these locations, with photographs included at LVIA Appendix 13.4 where available.



ALD make a number of comments relating to the timing that viewpoint photography was undertaken, suggesting that the photography used to support the LVIA does not comply with best practice for assessing landscape impact. The photos were taken in accordance with the requirements of the guidance noted above, so do comply with current best practice guidance. The timing of photography was influenced by the ongoing discussions with Tim Screen on the location of viewpoints (with photography undertaken as soon as possible after additional viewpoints were requested). However, the LVIA makes judgements on the likely effects in both summer and winter.

ALD suggest that various photographs do not indicate likely change to boundary conditions. Baseline photography complies with the requirements of GLVIA3 and LI TN 06/19. There is no requirement to represent changes to all viewpoints but these likely changes are clearly described in the LVIA, including the influence of works proposed to the A4095.

ALD raise concerns over the accuracy of a number of wireframes included in LVIA Appendix 13.8, particularly Viewpoints 1a and 5. The AVRs included in Appendix 13.8 were prepared independently by Vista3D. Their Methodology at the front of their document clearly states how their images have been produced and the standards to which they conform. Vista3D confirm that the position of the development from the various viewpoints would be as illustrated in their document.

ALD made a number of observations with regard to individual viewpoints:

- Viewpoint 1a : ALD noted this is the access point to the public footpath (PRoW) but the LVIA only notes receptors at this location as road users – BMD note that the influence on users of the PRoW was assessed more appropriately by Viewpoint 1b
- Viewpoint 1a Wireframe : ALD suggest that the removal of existing vegetation along the boundary of the A4095 should be represented in this wireframe. This would require a verifiable photomontage from this location, which was not considered necessary or requested by Tim Screen from this location.
- Viewpoints 1b & 3 : ALD raise concern that no AVRs are provided to indicate the built form / massing from these locations. BMD can confirm that, during the scoping discussions, Tim Screen confirmed that a photomontage or wireframe from the PROW was not required as part of the application, as it was clear that there would be a range of views of the proposals from within the site boundaries.
- Viewpoint 2 : ALD query the position of the western site boundary. We can confirm that, with reference to the Year 1 & 15 views in Appendix 13.8, the highway boundary is defined by the existing post and rail fence at the top of the grass bank to the east side of the M40. The variation in planting shown between Year 1 & 15 behind this fence is proposed and would be controlled by the scheme. ALD also raise concerns that this viewpoint illustrates *“a long flat linear structure evident above the tree tops”*. The nature of the structure visible from this location is accepted however, given the low sensitivity of the receptors passing over the M40 and with views of the scheme at this point, the LVIA describes this as a Minor Adverse effect in the short term, reducing to Negligible / Neutral in the long term (as mature woodland vegetation would largely screen views of the development).
- Viewpoint 4 : Aside from the views within and immediately adjacent to the Site, this is the most open view of the proposals, given the elevated nature of the vantage point. However, views from this position would be glimpsed briefly by passengers of vehicles passing over the M40, with effects to this view considered to be Minor - Moderate Adverse in the short term and reducing to Minor Adverse in the long term.
- Viewpoint 5 : ALD note vegetation removal alongside the boundary of the southern half of the golf course, noting that *“change does occur”*. Removal of vegetation along this boundary would have no effect on the findings of the LVIA, due to the extent of significant areas of vegetation within the southern 9 holes of the golf course.
- Viewpoint 10 : ALD queried the point of this viewpoint. We confirm that Viewpoint 10 was recorded to represent the view from the footpath to the south east of the site, with the suite of viewpoints representing a range of distances, directions and receptors as required by GLVIA3.
- Views from the M40 : ALD queried the timing of these photographs. These views were requested by Highways England, to understand the sequential nature of the view from the M40. The locations were agreed with Tim Screen and Highways England. Although Highways England could not grant access to

take verifiable photos from the M40, they agreed that Google StreetView images would be acceptable. The method applied by Vista3D to produce these 'illustrative' images is set out in the introduction to their document at Appendix 13.9.

- Views North from the M40 : ALD also raise concerns over the 'colours' of the slides and character of other parts of the development likely to be seen from the M40, including their influence on this 'green corridor'. This change is considered by the LVIA, particularly the scale and mass of the building and the influence of the brightly coloured slides. The mitigation proposals (including new woodland elevated on mounding) would assist in significantly softening views of the proposals from these low value views to the south-west of the site, largely reinstating the 'green corridor' along the busy M40.
- Views South from the M40 : ALD raise concerns over the loss of vegetation along the west boundary with the M40 and the potential to open up views of the development. A broad swathe of existing woodland (including the evergreen trees noted by ALD) would be retained and augmented by further woodland planting as illustrated on the Landscape General Arrangement drawings. This would establish a woodland edge ranging from 18 - 35m in width between the M40 and proposed built form, ensuring the proposals would be screened in the long term.

Although ALD note that they have not analysed each and every part of the LVIA that informed the definition of impact judgements, they consider that the judgements reported by the LVIA are lower than they would expect. BMD reiterate Tim Screen's judgement that *"The LVIA is a comprehensive and competently written document that complies with GLVIA 3 guidelines."* We would also note that the LVIA must be an impartial and proportionate assessment that considers:

- the sensitivity of the landscape and views (which are considered to be of local importance at most - none are considered to be of national or regional importance - with a substantial degree of enclosure to the site, as recognised in correspondence by Tim Screen)
- the nature of the proposals (the effects from which are considered to be local at most, again – particularly given the extent of enclosure in the landscape around the site)

ALD's conclusions are not considered to be either impartial or proportionate, nor are they based on a rigorous assessment as required by GVIA3, as admitted when they state that they did not *"analyse each and every assessment"*.

ALD raised the following concerns with LVIA judgements:

Construction Phase

- Change to landscape character at site level : ALD consider effects would be Major Adverse. As noted above, the LVIA needs to consider the value of the landscape features being lost - balanced against those being retained. Tim Screen has acknowledged that he considers the landscape is of low value, which is largely due to the manicured nature of the existing golf course. The most valuable features have been identified for retention, as illustrated on the Landscape General Arrangement Plans. A comprehensive Construction Environmental Management Plan would be put in place to ensure protection of retained features including woodland, trees, grassland and waterbodies.
- Change to local landscape character : ALD consider effects would be Major Adverse. As reported in the LVIA, the influence of the proposals on the local landscape character would be limited by the extent of enclosure to the site, with most areas of the local landscape remaining unaffected.

Operational Phase

- Change to Viewpoint 4 : ALD consider effects would be Moderate – Major Adverse. As reported in the LVIA, this view is considered to be of low value and is heavily influenced by detracting features of the M40, which reduces the overall effect of the Proposed Development on the view.
- Change to various other viewpoints : ALD consider the influence of the building, car park, lighting and vegetation removal are missing from the LVIA. The LVIA accepts that the vegetation alongside the A4095 would allow for filtered views into the site, opening up to allow brief direct glimpsed views where vegetation has been removed to facilitate entrance points (road and PRow) into the site. The LVIA also



considers the influence of car parking on views from the A4095, with increased planting along the eastern boundary and hedges within the car park considered sufficient to reduce views of cars across the car park and trees within the car park sufficient to substantially soften views of proposed built form.

ALD conclude this section of their review by making a high-level judgement (without in depth assessment, as noted earlier in their letter) that a development of this scale, with this amount of car parking and loss of landscape, is considered to be of significant impact. BMD have undertaken a comprehensive assessment of the likely impact on the landscape and views - this is reported in the LVIA. Tim Screen has acknowledged that he considers this is a comprehensive and competently written assessment that complies with current guidelines.

The brief assessment carried out by ALD makes a number of assumptions based on local knowledge but is not based on a rigorous assessment as required by GLVIA3.

Therefore, BMD consider that there is no sound basis for their conclusions.

ALD Review of Landscape Proposals

ALD begins by making a further statement that the development as a whole would “*create a significant visual intrusion, reduces the landscape area, and erodes the feeling of ‘open countryside’.*” The LVIA reports a rigorous assessment that clearly outlines the limited effects on the landscape and views - particularly given the degree of enclosure to the site afforded by existing retained vegetation but enhanced by extensive additional planting. The LVIA reports that the greatest effects would be to the site and its immediate vicinity, with limited influence on the local landscape and visual intrusion. The perception of 'open countryside' would remain unaffected in most areas of the landscape surrounding the site.

ALD make comment on the proposed realignment of PRoW 161/6, as it currently aligns with the position of the proposed hotel and car park. We are informed that the existing public footpath is currently seldom used, due to its route across the existing golf course. The scheme proposes to divert the footpath through the landscape corridor along the southern boundary, from the vicinity of the Club House / Hotel to the A4095, where it would meet the proposed footway to lead users along the A4095. The northern extent of this footpath already exits the golf course on the highway of the A4095 and walkers use the A4095 carriageway to connect with footpath 161/11/10 to the west side of the M40.

ALD raise queries regarding the proposed realignment of the PRoW, suggesting this is not clear on the Landscape General Arrangement Plans. The alignment of the diverted PRoW is clearly illustrated in the Design & Access Statement at 5.5.3. The existing northern footpath point would be closed, with the footpath diverted through the landscape corridor along the southern boundary of the site as noted above. Permissive access would still be afforded to the public, allowing access into the northern part of the site, via the existing northern footpath access point - but this would provide amenity use of the northern parkland only, with no connection to the diverted public footpath along the southern landscaped corridor. Combined, these proposals are considered to provide a substantial enhancement over the existing situation, as reported in the LVIA.

ALD raise concerns over the level of noise from the M40 and its influence on the amenity value of the paths through the northern parkland. The amenity value in the proposed northern parkland, with regard to the influence of the M40, is considered to be no different to the influence of the motorway noise on users of the existing golf course.

ALD raise concerns that “*Very few existing trees are indicated to be retained within the site*” suggesting that they are drawn “*with no use of topographic survey information*” and that the “*Existing landscape to be retained particularly along boundaries, including the motorway boundary, is unclear*”. Extensive areas of woodland and trees are proposed for retention as part of the development, particularly along the boundaries and within the large



area proposed for the northern parkland. The footprint of these areas has been drawn based on a Topographical Survey, Arboricultural Survey and current aerial photography of the site - ensuring accuracy and viability of tree stock to be retained. These areas are clearly illustrated on the Landscape General Arrangement and Planting Plans. All areas within the red line boundary are within the site, so would be retained in the long term as part of the proposals. Areas alongside the M40 are also indicated but are not considered necessary to achieve the mitigation required by the LVIA.

Being located at Bignell Park Barns, off the A4095 to the north east of the site, ALD query the configuration of the access proposals off the A4095 into the site and their influence on site boundary vegetation. AS noted above, existing vegetation to be retained is shown clearly on the Landscape General Arrangement Plans, with the required visibility splays and construction areas for the proposed highway / footway reflected on the reduction in extent of existing vegetation along this boundary.

ALD query the suitability of single species beech hedges, and concern over the use of flush kerbs – allowing car park runoff into soils below planting. Native hedgerows have been proposed along the east and southern boundaries of the site, maximising contributions to biodiversity and landscape character. Beech hedges are only proposed in the car park, as a formal feature - albeit remaining native. This approach has been agreed with Tim Screen. Porous paving is proposed in the car park, where surface water runoff reaching soils below hedges would only occur during extreme heavy rain events – where the volumes of water would significantly dilute any salt or contaminants washed from the car park surface.

ALD also raise concerns over the suitability of adding large earth bunds along the boundaries of the site, their influence on landscape character and the sustainability of woodland planting on these bunds. The current topography of the golf course is already uncharacteristic of the surrounding area, with bunkers, elevated greens and tee boxes forming un-natural features in this heavily manicured landscape. Nonetheless, given the degree of enclosure to the site, this existing topography does little to influence the character of the surrounding landscape. The proposed mounding is limited to the southern boundary of the site, intended to elevate woodland planting - enhancing its effect as mitigation. This woodland planting would begin to screen views of the mounding from the 5th year of establishment and is only likely to be perceptible from close proximity following 10 years of establishment. Given the degree of enclosure to the site, this change in topography will also have very little influence on the character of the surrounding landscape. Mounding is used widely to successfully enhance landscape mitigation on a broad range of developments across the country, with woodland and grassland vegetation successfully establishing on the 'steep slopes' of these earthworks. Ground conditions created on these mounds would be controlled through rigorous soil management implemented during the construction phase of the scheme, to ensure successful establishment of the woodland and grassland vegetation proposed.

ALD urge consideration of holistic proposals with regard to creation of new wildlife ponds. We can confirm that comprehensive ecological and landscape management plans have been submitted as part of the application. These have been developed as part of a well-coordinated and holistic design approach, the implementation of which would ensure successful enhancement of the landscape to maximise biodiversity and amenity value – including the establishment and enhancement of an extensive network of wildlife ponds.

With regard to tree planting species, ALD raise concern over the use of oak, willow, rowan and whitebeam – along with suggestions that woodland mixes should be native. The species specified have been agreed in consultation with Tim Screen (CDC Landscape Officer), who has liaised with his tree officer, and the project ecologist. BMD have the following response to the comments raised by ALD:

- Oak : This is one of the most important species in the UK - in landscape character, biodiversity and cultural terms, so BMD consider its use on this scheme should not be constrained by current biosecurity concerns. Biosecurity measures and guidance from the HTA and LI will be followed as part of the Construction Environmental Management Plan for the supply and implementation of the landscape on the scheme, to limit any risk associated with biosecurity concerns such as oak processionary moth.



- Willow : Salix has been specified following consideration of many relevant issues, including some of those noted by ALD.
- Sorbus species : As noted above, the species mix has been developed in consultation with Tim Screen and the project ecologist. Specific quantities would be determined at the detailed design stages.
- Native Species : Species used in woodland and hedgerows would be native. Woodland would be set out using the matrices set out in the Design & Access Statement - to assist with their sustainable long-term management. Hedgerows would comprise a species-rich mix that maximises their contribution to Biodiversity Net Gain on the site.
- Entrance Boulevard Planting : A disease resistant form of Elm was requested by the project ecologist. We have used Ulmus 'New Horizon' successfully on a number of large projects and have been advised by a landscape contractor we work with extensively, that the large stock specified is likely to be available. The Forestry Commission and Landscape Institute also advise that variants on native species need to be considered for climate change resilience. BMD consider the use of Ulmus 'New Horizon' or, as an alternative, Quercus palustris (pin oak) will provide a strong entrance avenue whilst remaining sympathetic to the character of the wider landscape.

CONCLUSION

As noted above, the LVIA has been carried out in accordance with the current guidelines of GLVIA3 and TN 06/19. This has been acknowledged by Tim Screen, CDC Landscape Officer, who has confirmed his opinion that *“The LVIA is a comprehensive and competently written document that complies with the GLVIA3 Guidelines”*

ALD judge that *“the impact both visually and in terms of change to the landscape character, is considered significant and a development of such a scale, footprint and massing is not commensurate with a site of this nature in this location.”* This judgement is incorrect, unfounded and inappropriate – as it is made without application of a rigorous LVIA assessment, as required by GLVIA3.

It follows therefore that, the ALD judgement of the project being considered contrary to policies ESD13: Local Landscape Protection and Enhancement; and, ESD 15: The Character of the Built and Historic Environment – is also unfounded. The LVIA and supporting landscape proposals demonstrate that appropriate mitigation can be provided to remove any significant effects on the landscape and views and, the LVIA demonstrates that the influence of the development would be to the site itself and its immediate environs, with limited or no influence to the wider landscape and views in the direction of the site. There would also be no undue harm on the setting of settlements or any landscapes of historic value.

Yours sincerely

Richard Waddell
NDH, BA (Hons), PGDipLA, CMLI

Senior Associate Landscape Architect

for BRADLEY MURPHY DESIGN LIMITED