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By Email

05/02/2020

Our ref: BMD Response to Comments from CDC Landscape Officer – 05.02.20

Great Wolf Resort, Bicester
BMD Response to Comments from CDC Landscape Officer

Dear Peter,

The following outlines our response to the comments provided in correspondence of 28th January 2020 by Tim Screen (Cherwell District Council’s Landscape Officer) to Clare Whitehead, to the application 19/02550/F for the Great Wolf Resort, Bicester.

<u>Tim Screen (CDC) Landscape Officer Comment:</u>	<u>Bradley Murphy Design Response:</u>
<p>The LVIA is a comprehensive and competently written document that complies with GLVIA 3 guidelines. In its judgement, defined under 13.8 Summary, the development will be assimilated into its surroundings, when considering visual and landscape effects / landscape mitigation proposals. In my opinion the site has low landscape sensitivity to change, and a visual effect ranging from neutral to moderate adverse at year 0.</p> <p>BMD, the landscape consultant was involved in a lengthy PREAPP consultation process with CDC.</p>	<p>BMD would agree with these observations. Note particularly Tim Screen’s judgements that:</p> <ul style="list-style-type: none"> - The LVIA is a comprehensive and competently written document that complies with GLVIA3 - The site has low landscape sensitivity to change - BMD was involved in a lengthy pre-application consultation process with CDC
<p>The LVIA guidelines must address the major issues of over development!</p>	<p>GLVIA3 does not require an LVIA to make judgements on whether a proposal is considered ‘overdevelopment’, rather as part of the EIA process, it requires LVIA to identify any significant environmental effects. This process requires consideration of the effects before mitigation is applied and residual effects once mitigation has been implemented. In the case of the Proposed Development, the potential effects have been minimised as part of the iterative design process, with some measures forming part of the inherent design of the scheme (influencing massing and position of development on the site), whilst others are then achieved through establishment of landscape measures.</p>



<u>Tim Screen (CDC) Landscape Officer Comment:</u>	<u>Bradley Murphy Design Response:</u>
<p>I am not sure if cumulative developmental harm has been addressed adequately in the LVIA: I note WSP's Environmental Statement Volume 1 Chapter 14 Cumulative Effects does not address development's combined effect with Bicester Health Club and Spa. Even the lighting's cumulative harm has not been address in this document.</p>	<p>LVIA Appendix 13.7 of ES Volume 2 includes a full schedule of cumulative effects and includes the Bicester Golf and Country Club scheme (Ref. 15/01068/F).</p> <p>As noted in the LVIA Methodology at Appendix 13.1, paragraph A.2.8 <i>"The LVIA considers: the likely effects of temporary lighting resulting from construction; the change to the baseline sky glow; and, the change to the landscape and views as a result of the introduction of lighting as part of the Proposed Development"</i>, with paragraph A.3.10 adding that <i>"Effects at night are considered <u>where these would substantially differ from day time effects</u>"</i> (underline added here for emphasis).</p> <p>The LVIA then picks out where night time effects substantially differ from those identified in the daytime. Cumulative effects are not considered to substantially differ between day / night, so judgements made apply to both.</p>
<p>Because of site is visually contained by boundary hedgerow and trees the development will mainly be experienced from the site's interior, from the perspective of visitors and visual receptors using the interior PRoW.</p>	<p>BMD would agree with Tim Screen's judgement, that the site is visually contained and the development will be mainly experienced from the site's interior.</p>
<p>There is strong objection for this development from the local community.</p>	<p>This comment is irrelevant to LVIA or the landscape design of the scheme.</p>
<p>The developer will argue that the landscape proposals provide landscape mitigation, amenity and wildlife habitat enhancement for nature. Specially the planting of native tree mixes and standard trees, wildflower areas established and managed under the landscape management plan.</p>	<p>BMD concur with this, the mitigation measures are set out comprehensively within the LVIA, landscape section of the Design & Access Statement, management plans (landscape and ecology) and drawings that accompanied the application. These measures provide for landscape and ecological enhancement (improvements above the current condition, achieving Biodiversity Net Gain) as well as mitigation for the scheme.</p>
<p><i>Policy ESD1 Mitigating and Adapting to Climate Change states that new development should ensure its resilience to climate change taking into account the known physical and environmental constraints and through the provision of green infrastructure</i></p> <p>Is the developer able to justify this development under this policy?</p>	<p>As discussed with Tim Screen during various pre-application meetings, a broad range of native species and their variants have been proposed to respond to landscape and biodiversity requirements, whilst mitigating likely pressures on green infrastructure that may arise as a result of climate change.</p> <p>Measures for adapting to climate change would also be provided as part of the Sustainable Drainage Strategy that accompanied the application.</p>

Yours sincerely

Richard Waddell

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for BRADLEY MURPHY DESIGN LIMITED