

Briefing Note

REF: P22-1080 Land North of Camp Road, Heyford Park **DATE:** 28/04/2022

1. INTRODUCTION

- 1.1 Planning application 21/04289/OUT has been submitted to Cherwell District Council relating to the proposed development of 230 dwellings to the north of Camp Road and west of Chilgrove Drive, east of Heyford Park, Oxfordshire. The project is EIA development, and an Environmental Statement (ES) accompanies the planning application. This Briefing Note was commissioned by Dorchester Living Limited as an independent audit of that work and presents the findings of a high-level review of ES Appendix 8.1 Landscape and Visual Impact Assessment ('the LVIA', prepared by Tyler Grange (TG report No. 13464_R04a_AW dated 23rd December 2021)).
- 1.2 The LVIA comprises 5 sections (Introduction and Scope; Baseline Appraisal; The Proposals and Planning Context; Assessment of Effects; and Conclusion) and is supported by Appendices and Plans.

2. METHODOLOGY

- 2.1 Pre-application advice was sought from CDC's Landscape Officer as set out at Appendix 2. It is however noted that the consultation regarding viewpoint selection was based on a ZTV of 10m high development; however, for proposed development of up to 3 storeys we would expect a development height of 13m to be assessed. Furthermore, no allowance has been made for adjustment of ground/formation levels within the development areas.

3. LANDSCAPE ASSESSMENT

- 3.1 Extracts from published landscape character assessments at national, county, and local level are discussed at paragraphs 2.5 to 2.14 of the LVIA. Reference is made to Cherwell Landscape Character Assessment (CLCA), published 1995 which includes Figure 15: Enhancement Strategy. Figure 15 (reproduced at Appendix 3 of the LVIA) depicts the RAF airfield, and apparently land around it due to the coarse grain of the mapping used, within the 'reconstruction' category.
- 3.2 Land within the site lies outside of the RAF airbase (see Former RAF Upper Heyford Airbase: Landscape Character Assessment of the Airbase South of the Cold War Zone, 2006: <https://www.cherwell.gov.uk/downloads/file/347/landscape-character-assessment-of-the-airbase>) and so its agricultural character self evidently differs from that of the brownfield airbase that would benefit from 'reconstruction'.
- 3.3 The agricultural site comprising pasture defined by hedgerows and wet corridor, 'performs a primarily agricultural function' (LVIA para.2.31). Whilst influenced by adjacent land uses, the site does not fall within the former airbase and so the CLCA description of 'landscapes so modified by human activity that they no longer bear any resemblance to their former character (including airfields). These landscapes have a

high capacity to accommodate change because they have already lost their intrinsic character' does not apply to the site.

- 3.4 The LVIA places inappropriate reliance on a too coarsely drawn plan contrary to site survey findings and consultation responses (LVIA Appendix 2). The application site retains an intrinsic agricultural character comprising pasture enclosed by hedgerows and a wet corridor with trees and so would not 'benefit' from 'reconstruction'; to argue otherwise as the LVIA does is deeply flawed.
- 3.5 Given the agricultural function of the site with wet corridor as noted in the LVIA, and that it lies outside of and displays a contrasting landscape character to the former airbase, the LVIA therefore places undue reliance on dated coarse-grained mapping and grossly underplays the inherent landscape value of the site.
- 3.6 The Parameter Plans show that a new vehicular access is to be formed with Camp Road toward the southwest corner of the site. The southern site boundary is marked by an established hedgerow set behind a narrow verge. Formation of the new junction will require removal of notable lengths of the hedgerow to create suitable and safe visibility splays to the east and west. The LVIA (Appendices 9 and 10) makes no reference to the loss of this hedgerow and the resulting effects in terms of landscape element loss, landscape character of the site and Camp Road, or visual amenity. On the contrary, the LVIA relies on the screening effects of the established hedgerow to diminish visual effects on Camp Road receptors.

4. VISUAL ASSESSMENT

- 4.1 Paragraphs 2.41 to 2.43 of the LVIA present the reasoning for the selection and presentation of 'Type 1: annotated viewpoint photographs' visualisations as defined in The Landscape Institute's Technical Guidance Note 06/19: Visual Representation of Development Proposals (TGN06/19). Specific reference is made in the LVIA to TGN06/19 Table 1: Relationships between Purpose, User and Visualisation Types, and Table 2: Visualisation Types. As EIA development, the proposed development falls within Category A 'most planning applications accompanied by LVIA (as part of a formal EIA)', or possibly Category B 'some LVIAs for EIA development'. As the ES is a public document, visualisations are in the public domain.
- 4.2 Table 1 of TGN06/19 states that for Category A projects, appropriate visualisation types are 2 to 4 inclusive, or for Category B projects, types 1 to 4. As an outline planning application, detail is not available to prepare type 4 visualisations, but the information stipulated in the Parameter Plans (reproduced at Appendix 5 of the LVIA) provides sufficient detail to prepare informative and meaningful visualisations to Type 2 or 3 level (3D wireline/model or photomontage/massing model) to assist the local planning authority in its decision-making, and to aid public understanding of the effects of the proposed development.
- 4.3 Table 2 of TGN06/19 sets out the aim of visualisation for each Type:
- Type 1: Annotated Viewpoint Photograph – To represent context and outline or extent of development and key features;
 - Type 2: 3D Wireline/Model (non-photographic) – To represent 3D form of development/context; and

- Type 3: Photomontage/photowire – To represent appearance, context, form and extent of development.
- 4.4 Photographic representations of the 10 viewpoints agreed with CDC are presented on drawing **13464/P11: Plan 5: Photosheets**, in the format of firstly, a Type 1 visualisation at 100% A3 page size and, secondly, a wider context view with key plan showing viewpoint location, direction of view and site location.
- 4.5 Of these, Photosheets 4, 5, 6, 7, 8, 9, and 10 are annotated with a red bar and, all except Photosheets 7 and 8 note 'extent of site within the view'; there is no annotation/approximate location, and the extent of the site is not indicated on Photosheets 1-3. Other identifying features within the view are not annotated on any of the Photosheets contrary to the statement at paragraph 2.41 of the LVIA and the recommendations of TGN06/19. The Photosheets as presented in the LVIA are not in accordance with best practice as described in TGN06/19 and are palpably insufficient for an EIA development.
- 4.6 Whilst the proposed development is submitted in outline, it is EIA development, and the extent and height of proposed built form is defined by the Parameter Plans. A review of the Photosheets reveal several anomalies that cast doubt on the understanding of the location and extent of the site and proposed development within it, and in doing so, the robustness of the visual assessment, as set out in Table A below. Given that this is for EIA development that is clearly defined by height and locational parameters, a higher level of visualisation (Type 2 or 3) is required to support and demonstrate likely visual effects in accordance with TGN 06/19 so that the local planning authority and the public can corroborate the findings of the LVIA and make informed decisions.
- 4.7 On the basis of repeated underestimation of the extent of the site as inconsistently applied to the Photosheets, the visual assessment as presented in the LVIA is unsound.

Table A: Review of LVIA Photosheets

Photosheet	Comments
1	Approximate location of site/development not indicated; not in accordance with TGN06/19.
2	Type 1 and context views looking in wrong direction, aligned with centreline of railway tracks looking NW (the Type 1 view is cropped looking NW to NNW). Site lies WNW to left of view. Viewpoint on bridge further to east would have provided a more open view toward site/be more representative. Approximate location of site/development not indicated; not in accordance with TGN06/19.

Photosheet	Comments
3	<p>Viewpoint incorrectly located to east, not west of woodland belt; Oxfordshire Definitive Map (and Ordnance Survey map) shows PROW 289/1/20 (Aves Ditch/Claud Duval Way) along western edge of woodland belt.</p> <p>Viewpoint on PROW to the west of the woodland belt more likely to have open view toward site/would not be screened by the woodland belt (see Photoview 5).</p> <p>Approximate location of site/development not indicated; not in accordance with TGN06/19.</p>
4	<p>Annotation on Type 1 and context views appears to apply to eastern boundary of site only – the actual extent of site (northern section) extends closer to the hardened aircraft shelters visible (c.9m height) to the NW (in the right-hand part) of the context view.</p> <p>Extent of site shown incorrectly, implying that the site is smaller than it actually is/occupies a narrower field of view.</p> <p>Location and extent of proposed built form not indicated.</p>
5	<p>The eastern-most point of the site lies further east than the northwest corner of the woodland belt.</p> <p>Extent of site shown incorrectly, implying that the site is smaller than it actually is/occupies a narrower field of view.</p> <p>Location and extent of proposed built form not indicated.</p>
6	<p>Poor selection of viewpoint means that fencepost is obtrusive, and obscures view toward site. Camera is focussed on fence in immediate foreground; land beyond the fence, including the site is out of focus.</p> <p>The north-western corner of the site lies further north (left) than the electricity substation. The southeast corner of the site lies further south (right) behind the tall stone barn at Heyford Leys Farm.</p> <p>Extent of site shown incorrectly. Whilst much of the site would be obscured by built form and tree cover in the middle distance, the Photosheets are misleading and imply that the site is smaller than it actually is/occupies a narrower field of view.</p> <p>Location and extent of proposed built form not indicated.</p>

Photosheet	Comments
7	<p>Type 1 and context views looking in wrong direction, aligned with centreline of Chilgrove Drive looking south; site lies SW.</p> <p>Style of annotation differs from other Photosheets/red line appears to run along eastern boundary of site (right of view), but not annotated.</p> <p>Location and extent of proposed built form not indicated.</p>
8	<p>poor selection of viewpoint limits views of the western part of the site; a viewpoint slightly to the east would be more representative.</p> <p>Style of annotation differs from other Photosheets/red line appears to run along eastern boundary of site (right of view), but not annotated.</p> <p>Location and extent of proposed built form not indicated.</p>
9	<p>Annotation on Type 1 and context views incorrect - the southern boundary of the site extends to and runs along the northern edge of Camp Road and so development would be seen through and above the roadside hedgerow including proposed site access. The northern boundary lies much further to the north (left) than indicated although much of this would be obscured by intervening built form and tree cover.</p> <p>Extent of site shown incorrectly, whilst much of the site would be obscured by development to the northeast (left) more development within the site would be visible to the south (right) than indicated. The Photosheets are misleading and imply that the site extent is only a fraction of its actual extent/occupies a narrower field of view.</p> <p>Location and extent of proposed built form not indicated.</p>
10	<p>Annotation on Type 1 and context views appears to apply to eastern boundary of site only – the actual extent of site (northern section) extends closer to the hardened aircraft shelters visible (c.9m high) to the NW (in the right-hand part) of the context view. The southeast corner lies closer to the road sign (left) than indicated.</p> <p>Extent of site shown incorrectly, implying that the site occupies only about half of the actual width of view than it does in reality.</p> <p>Location and extent of proposed built form not indicated.</p>

5. CONCLUSION

- 5.1 The LVIA places inappropriate reliance on a coarsely drawn plan contrary to site survey findings and consultation responses, and in doing so downplays its landscape value and sensitivity. The site retains an intrinsic agricultural character comprising pasture enclosed by hedgerows with wet corridor and trees and so would not 'benefit' from 'reconstruction'. Given the agricultural function of the site with wet corridor as noted in the LVIA, and that it lies outside of and displays a contrasting landscape character to the former airbase, it is considered that the LVIA places undue reliance on dated coarse-grained mapping and seriously underplays the inherent landscape value of the site.
- 5.2 Formation of the new junction with Camp Road will require removal of notable lengths of the hedgerow to create suitable and safe visibility splays. The LVIA makes no reference to the loss of this hedgerow and the resulting effects in terms of landscape element loss, landscape character of the site and Camp Road, or visual amenity. On the contrary, the LVIA relies on the screening effects of the established hedgerow to diminish visual effects on Camp Road receptors.
- 5.3 Whilst the proposed development is submitted in outline, it is EIA development, and the extent and height of proposed built form is defined by the Parameter Plans. A review of the Photosheets reveal several important anomalies that cast doubt on the understanding of the location and extent of the site and proposed development and robustness of the visual assessment. Given that this is for EIA development that is clearly defined by height and locational parameters, a higher level of visualisation is required to support and demonstrate likely visual effects so that the local planning authority and the public can corroborate the findings of the LVIA and make informed decisions.
- 5.4 To address the inaccuracies and shortcomings of the LVIA so that it can comprise a robust document to assist the LPA and stakeholders in decision-making, the following would be required:
- An independent and impartial assessment of the landscape attributes, character, and quality of the site;
 - Accurate, meaningful, and informative visualisations based on representative, good quality photography at a suitable standard for illustration and assessment of an EIA development. We would expect this to include:
 - Contextual photographs from unimpeded viewpoints looking toward the site, with the full extent of the site (red line) suitably and consistently annotated alongside annotation of other key orientation features or points of interest (LI TGN 06/10, Type 1);
 - Visualisations, such as a mass model/blocks overlain onto photographs or photowire, based on the defined spatial parameters as set out on the EIA Parameter Plans with particular reference to Land Use and Building Heights (LI TGN 06/19, Type 3).
- 5.5 Notwithstanding, based on the LVIA as submitted, and in light of over-reliance on coarse-grained landscape character mapping and repeated underestimation of the

extent of the site as inconsistently applied to the Photosheets, the landscape and visual assessment as presented in the LVIA is unsound.

- 5.6 Should the LVIA not be revisited then it would not comprise a robust or appropriate basis for the determination of this application.

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