

LAND ADJACENT TO HIGHWORTH ROAD • FARINGDON

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PROOF OF EVIDENCE

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on behalf of The Vale of the White Horse District Council



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1. Qualifications & Experience

- 1.1. This evidence has been prepared by Michèle Lavelle.
- 1.2. I studied a diploma in Landscape Architecture at the University of Gloucestershire and became a chartered member of the Landscape Institute in 1985. I also gained a Master of Arts degree in Town and Country Planning in 2005 and a Diploma in Urban Design in 2009, both of which I studied on a part time basis at the University of the West of England.
- 1.3. I am an academician at the Academy of Urbanism¹.
- 1.4. I am a panel review member of Bristol City Council's Urban Design Forum², a position that I have held for seven years and have reviewed many inner city and rural fringe projects. I am also a founding member and vice chair of Bristol City Council's Tree Forum³ at which we review policy and practice to ensure governance of the urban canopy cover.
- 1.5. As a visiting lecturer at the University of Gloucestershire I specialise in teaching master-planning, softscape typologies, detail softscape plans and specifications to final year students of landscape architecture.
- 1.6. I have over 30 years experience as a landscape architect based in the UK working in private practice, spending the first nine years in a large international architectural practice and subsequently as a partner of 4D Landscape Design (4DLD) working as a landscape architect and urban designer.
- 1.7. 4DLD is a small practice engaging with both the public and private sectors on a broad range of projects including master-planning, major hospitals, British embassies, business parks, schools, housing, power stations, parks and urban regeneration.

¹ "The Academy of Urbanism is a self-funded, politically independent organisation made up of over 500 leaders, thinkers and practitioners involved in the social, cultural, economic, political and physical development of our villages, towns and cities."

² "The Bristol Urban Design Forum (BUDF) is a group of design and environment professionals who offer free, independent consultation on significant development proposals in the city, leading to recommendations for improvement and added value. BUDF also advises Bristol City Council on urban design policy."

³ "The Tree Forum was formed to bring together individuals and organisations interested in the management and enhancement of the urban canopy cover in Bristol."

- 1.8. As a practice 4DLD has advised a wide variety of clients on planning matters in relation to landscape including full Environmental Impact Assessments (EIAs), Landscape and Visual Impact Assessments (LVIAs) through to detailed planning submissions.

2. Introduction

- 2.1. This Appeal relates to the refusal on 1 October 2013 of an outline planning application for up to 94 dwellings with landscaping and associated works on the land off Highworth Road in Faringdon, Oxfordshire.
LPA ref: P13/V1366/O.
- 2.2. Having visited the site and examined the application scheme I am against the appeal proposals for both the reasons stated by the Local Planning Authority, and those stated in my practice's Landscape And Visual Impact Assessment which was undertaken as part of my Proof of Evidence.
- 2.3. I have been instructed by the Vale of the White Horse District Council (VoWHDC) to prepare the LVIA and the further proof to defend their decision to refuse the application in terms of both the landscape and its character, and the visual impacts on the area that would result from development.
- 2.4. The appeal site currently lies in the North Vale Corallian Ridge, an area in part previously known as The North Vale Area of High Landscape Value (ref Faringdon Local Plan 1991).
- 2.5. I have visited the site and its wider setting on at least three occasions with a colleague and other members of the team in various weather conditions.
- 2.6. Receptor viewpoint locations cited in the LVIA prepared by 4DLD were agreed with the planning department of the VoWHDC.

3. Reasons for Refusal

- 3.1. The application was refused permission on three core grounds, two of which involve the landscape and visual impact of the proposals on the site as follows:
- 3.2. - *"1. The application site lies within the North Vale Corallian Ridge landscape area, and is prominent in views due to its slope up towards a ridge top. The development proposed constitutes a prominent urbanisation of this sensitive area of countryside, which will erode the setting of the town and harm the prevailing character and appearance of the landscape. Therefore the proposal is contrary to policies NE7 and GS1 of the adopted Vale of White Horse Local Plan 2011".*
- 3.3. - *"2. From the illustrative materials submitted, and having regard to the layout, the use of three storey dwellings⁴, and the relatively high density, the proposed scheme would result in an insensitive form of development on this edge of town location. The type and form of the built environment proposed would not be commensurate with what would be reasonably expected from a fringe-of- settlement location. Therefore the application is considered to be contrary to policy DC1 of the adopted Vale of White Horse Local Plan 2011."*
- 3.4. The third reason for refusal relates to the capacity of the existing infrastructure to accept additional demand.
- 3.5. The reasons for refusal given by the Council are valid in landscape and policy terms, and were advised to the applicant (or their agent) prior to determination of the application.

⁴ It is noted (and accepted in the LVIA, and by VoWHDC) that the proposal is for two storey buildings, not three as mentioned in this clause. The illustrative diagrams in the Applicant's Design and Access statement, however, are ambiguous on this point, e.g. , Figure 34 illustrates 2 storey housing, whilst figures 35 and 42 show 3 storey buildings in the general mix of house types.

4. Scope of Evidence

- 4.1. My evidence focusses on the potential impact of the proposed development on the landscape and visual amenity of the site in its context. The basis for this aspect of my evidence is the LVIA prepared by 4DLD, which considered the landscape and visual implications of development changes to the site. This analysis has been carried out in accordance with the Landscape Institute's Guidance for Landscape and Visual Impact Assessment (GLVIA) Edition 3. This updated edition, published in 2013, now incorporates European Law encompassed in the Florence Convention 2000, which was ratified by the UK in 2006 and binding since March 2007 under the European Landscape Convention (ELC). The updated GLVIA includes many references to the ELC with its broader definitions of valuable landscape typologies.
- 4.2. I also examine the appeal proposal in relation to the various planning constraints and frameworks that apply to the site and its wider landscape setting. These policies range from the European and National levels to the Local Plan.
- 4.3. I have assessed the Applicant's accompanying Design and Access Statement which explains the outline aspirations for potential development. The document is reasonably detailed in suggesting both the layout and form of development for the site, and I therefore comment where necessary on the proposed details and implications of the illustrative designs.
- 4.4. Planning issues are covered in more detail by Mr Rocke, and Ecological issues are described by Mr Lamb.

5. Landscape Planning Context

5.1. The site lies within the administrative boundary of the Vale of the White Horse District Council. Relevant local landscape planning policies are as set out in the VoWHDC Local Plan 2011 (adopted July 2006), within the context of the subsequent National Planning Policy Framework . The following paragraphs set out the relevant National and local planning policy framework:

5.2. National Planning Policy Framework 2012 (NPPF)

5.3. The Framework's purpose is to help achieve sustainable development, however it does make explicit reference to landscape and the environment, beginning with the Ministerial forward where it is stated that:

5.3.1. *'Our natural environment is essential to our wellbeing...'*

5.4. When discussing decision taking within the planning process the NPPF makes clear that where the development proposals accord with the development plan approval should be granted. Where the development plan is absent, silent or relevant policies are out of date, permission should be granted unless:

5.4.1. *- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*

5.4.2. *- specific policies in this Framework indicate development should be restricted. (NPPF paragraph 14)*

5.5. With this in mind I have set out where I believe landscape and the environment is emphasised as being of importance elsewhere in the Framework and how these statements and principles should be acknowledged within the context of the Framework taken as a whole. This list is not exhaustive but gives my own opinion as to the importance placed on landscape and visual matters within the planning process as outlined within the Framework.

5.6. The 12 core planning principles are set out at paragraph 17, those relevant to landscape issues include:

- take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving communities within it;
- contribute to conserving and enhancing the natural environment and

reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework;

- promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production);
- conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;

- 5.7. At Section 8 'Promoting healthy communities' the Framework states in paragraph 69 that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities and that planning policies and decisions should aim to achieve places which promote:

5.7.1. - *"opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments, strong neighbourhood centres and active street frontages which bring together those who work, live and play in the vicinity;"*

5.7.2. As described in the LVIA, the site, whilst private land, is used on a regular basis and in all weathers by dog-walkers who inevitably stop and chat on occasion. Were it not for this site and its convenient location for the purpose these people might never meet or have cause to talk to one another.

5.7.3. Although seasonal the site has proven to be perfect when it snows and inevitably draws people together whether it be building a snowman, stray snowballs flying or crashing or gently gliding into a stranger. During an exceptionally bad winter this site could well provide exceptional memories that could last a lifetime.

5.7.4. This site provides these opportunities on the doorstep of Faringdon, so close to the population that access is available entirely by foot.

- 5.8. With regard to open space paragraph 74 states that Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- 5.8.1. - *"the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location;"*
- 5.8.2. This site is unique in its convenient location and topography for both regular and occasional recreational use and is therefore difficult to replicate elsewhere in or near Faringdon.
- 5.9. In relation to Public Rights of Way paragraph 75 states:
 - 5.9.1. - *"Planning policies should protect and enhance public rights of way and access. Local authorities should seek opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails."*
 - 5.9.2. The PRoW through the site connects into a well-used circuit of paths in the locality (see appendix 5 of the LVIA). Whilst the development proposals retain the PRoW, its character and the experience of users will change considerably from a rural to urban aspect. The footpath will become an alleyway between two sets of rear gardens in part, and a suburban footpath for about a fifth of its current length where it would border the proposed new access road.
- 5.10. Section 11 of the Framework deals with conserving and enhancing the natural environment and states in paragraph 109 that 'The planning system should contribute to and enhance the natural and local environment' by:
 - 5.10.1. - *"protecting and enhancing valued landscapes, geological conservation interests and soils;*
 - 5.10.2. - *recognising the wider benefits of ecosystem services;*
 - 5.10.3. - *minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;"*
- 5.11. 'Valued' landscapes are often considered to be those with a special designation. The ELC recognises the value of ALL landscapes. It is worth noting that this site is within the former North Vale Area of High Landscape Value. Whilst the planning context name has changed for the area, the quality of the landscape has not.

- 5.12. Paragraph 113 sets out the need for criteria based policies against which proposals for any development on or affecting wildlife or geodiversity sites or landscape areas will be judged: *"Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks"*.
- 5.13. The NPPF states in paragraph 123 that planning policies and decisions should aim to:
- 5.13.1. - *"identify and protect areas of tranquility which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason."*
- 5.13.2. The site provides the foreground and setting for bucolic views across the Vale, especially from the PRoW and the Highworth Road lay-by. This setting is tranquil and is relatively undisturbed by noise. By contrast, views from Folly Hill, also a local viewing point, are disturbed by the constant hum of traffic noise from the A420.
- 5.14. Vale of White Horse Local Plan 2011 (July 2006)**
- 5.15. There are a number of policies which guide location of development in the local plan, with GS1 and NE7 cited in the first reason for refusal⁵.
- 5.16. Policy GS1 seeks to concentrate new development for housing and employment at the five main settlements of Abingdon, Botley, Faringdon, Grove and Wantage. It does however state that important areas of open land - such as public open space, playing fields, amenity space, allotments and environmental corridors - will be protected from development. In visual terms and in the context of its wider setting this site is of high importance and as such deserves protection from development under this policy. Its importance as a place of human interaction and enjoyment further reinforces the case that this site should be protected from development.

⁵ - The application site lies within the North Vale Corallian Ridge landscape area, and is prominent in views due to its slope up towards a ridge top. The development proposed constitutes a prominent urbanisation of this sensitive area of countryside, which will erode the setting of the town and harm the prevailing character and appearance of the landscape. Therefore the proposal is contrary to policies NE7 and GS1 of the adopted Vale of White Horse Local Plan 2011.

- 5.17. Policy NE7 highlights the importance of The North Vale Corallian Ridge and that special care is required in assessing the visual impact of proposals for development, as follows:

The North Vale Corallian Ridge

7.61 The Oxfordshire Structure Plans (2011 and 2016) seek to ensure that the local landscape character should not be damaged. The Council has identified the Corallian limestone and sandstone ridge and the adjoining Thames Valley between Buscot and Wytham as an area requiring special care in assessing the visual impact of proposals for development. The Council remains committed to protecting the North Vale Corallian Ridge from development which would harm its special character and when considering applications will pay particular regard to the siting, mass, scale and appearance of the proposed development, the external materials that are to be used, any proposals for external lighting and the nature and extent of any associated landscaping proposals.

7.62 The North Vale Corallian Ridge has a striking landform with a steep north facing scarp slope separating the clay vale from the Thames valley. In the west the ridge has been dissected by streams, which have eroded steep slopes to hills such as Badbury Hill and Faringdon Folly. The ridge is characterised by woodland, including a significant proportion of ancient woodland, country houses designed to look out over the scarp, villages built of the local coral ragstone, and expansive views.

POLICY NE7

DEVELOPMENT WHICH WOULD HARM THE PREVAILING CHARACTER AND APPEARANCE OF THE NORTH VALE CORALLIAN RIDGE, AS SHOWN ON THE PROPOSALS MAP, WILL NOT BE PERMITTED UNLESS THERE IS AN OVERRIDING NEED FOR THE DEVELOPMENT AND ALL STEPS WILL BE TAKEN TO MINIMISE THE IMPACT ON THE LANDSCAPE.

- 5.18. As found in the LVIA prepared by 4DLD, the location, aspect and topography of this site is such that any scale of development would be highly visible from particular viewpoints towards the north facing scarp slope of the North Vale Corallian Ridge. The reason for refusal in respect of this policy is heavily supported by the findings of the LVIA.
- 5.19. The second reason for refusal addresses the implication of illustrative material submitted. Whilst this is an outline application and layout details and materials are not firm proposals, the impact of massing and scale can

be assessed. Policy DC1⁶ is cited as a reason for refusal⁷, detail extracts are as follows:

- 5.20. In paragraph 4.7 it states that:
"4.7 PPS1 recognises that new buildings and their curtilages have a significant effect on the character and quality of an area, and that the appearance of a proposed development and its relationship with its surroundings are material considerations when determining planning applications. Both of these aspects require an understanding of the context within which the development takes place and the relationship between all the elements of the built and unbuilt spaces. The Oxfordshire Structure Plan in policy G2 states that all development should be of a scale and type appropriate to its site and surroundings and incorporate a high quality of layout, design and landscaping."
- 5.21. In the LVIA prepared by 4DLD the impact of new buildings on this site in the context of its setting and its relationship with all the elements of the built and unbuilt spaces has been fully assessed. I consider that development of any scale would not be appropriate to this site or its surroundings.
- 5.22. *"4.8 Good design should be the aim of everyone involved in the development process, whether it be developers, architects, builders, entrepreneurs or householders, and it will be encouraged everywhere. Good design not only improves the quality of the environment, it also attracts business and investment and reinforces civic pride. It can help to secure public acceptance of new development. "* In this context I do not consider that any amount of good design would improve the quality of this

⁶ "POLICY DC1

DEVELOPMENT WILL BE PERMITTED PROVIDED THAT:

i) IT IS OF A HIGH QUALITY AND INCLUSIVE DESIGN SUCH THAT THE LAYOUT, SCALE, MASS, HEIGHT, DETAILING, MATERIALS USED AND ITS RELATIONSHIP TO ADJOINING BUILDINGS AND OPEN SPACE DO NOT ADVERSELY AFFECT THOSE ATTRIBUTES THAT MAKE A POSITIVE CONTRIBUTION TO THE CHARACTER OF THE LOCALITY; ii) IT TAKES INTO ACCOUNT LOCAL DISTINCTIVENESS AND CHARACTER EITHER IN A MODERN OR A TRADITIONAL INTERPRETATION."

⁷ From the illustrative materials submitted, and having regard to the layout, the use of three storey dwellings, and the relatively high density, the proposed scheme would result in an insensitive form of development on this edge of town location. The type and form of the built environment proposed would not be commensurate with what would be reasonably expected from a fringe-of- settlement location. Therefore the application is considered to be contrary to policy DC1 of the adopted Vale of White Horse Local Plan 2011

environment nor could it help to secure public acceptance of development of this site.

- 5.23. *"4.9 Proposals should be based on a thorough assessment of the surrounding built and natural environment and the defining characteristics of the local area, including local building traditions and materials. Although the Council will seek to promote local distinctiveness, this does not mean that new designs should simply mimic their surroundings: innovative designs and increases in density may be acceptable. Through policy DC1 below the Council will ensure that the scale, mass, height and layout of the development and the materials used do not harm the character and appearance of its surroundings and that wherever possible new development will enhance the local area. The preparation of Parish Plans will be helpful in enabling local communities to make known their views on planning matters in their areas."* A thorough assessment of the surrounding area and natural environment has been carried out by both my practice and that of the appellants in the production of respective LVIA's. Much of our findings are in accord though interpretation and assessment differs due to alternative perspectives. Again, I consider that any scale of development would cause harm and could not enhance the local area in any shape or form.
- 5.24. Paragraph 4.10 states that:
'...Policy DC1 refers to inclusive design which is about ensuring buildings and places can be used by everyone. It means thinking about the way design affects our ability to move, see, hear and communicate. It aims to remove barriers, enabling everyone, regardless of age, gender, ethnicity or ability, to participate in everyday activities'. Inclusivity of design will be difficult to achieve here given that the site has an existing average slope of 1 in 13 and that, through the need to create a series of flat planes to accommodate development, some gradients between areas and buildings will necessarily become much steeper, possibly requiring retaining walls in places, together with steps and ramps.

6. Landscape and Visual Impact Assessment

- 6.1. The process of assessing landscapes and visual amenity as a tool in the planning process is well established and therefore helps to inform this proof of evidence.
- 6.2. In so doing my practice, 4DLD, has prepared a Landscape and Visual Impact Assessment (LVIA) in accordance with guidance from the Landscape Institute in the Guidelines for Landscape and Visual Impact Assessment 2013 (GLVIA 2013). Building on previous editions, this guidance is now in its third edition and is a tool which is *'used to identify and assess the significance of and the effects of change resulting from development on both the landscape as an environmental resource in its own right and on people's views and visual amenity'*. (GLVIA 2013 paragraph 1.1).
- 6.3. It states that a LVIA must address both the effects of the proposals on the landscape as a resource in its own right and the likely effects on views and visual amenity.
- 6.4. The recent (3rd) edition of the GLVIA underlines the importance landscape (as a resource) has within a European context through the European Landscape Convention (ELC). In GLVIA 2013 paragraph 2.11 it states that: *"...the ELC makes clear, particular attention needs to be given to landscape because of the importance that is attached to it by individuals, communities and public bodies"*. It goes on to cite eight bullet points that state the importance of landscape, five of which I consider to be pertinent to this site as follows:
 - *a shared resource which is important in its own right as a public good*
 - *an environment for flora and fauna*
 - *the setting for day to day lives - for living, working and recreation*
 - *opportunities for aesthetic enjoyment*
 - *a source of memories and associations, which in turn may contribute to wellbeing*
- 6.5. GLVIA 2013 paragraph 5.26 notes that the ELC places less emphasis on special landscapes (which are generally covered by their own legal protections) and more recognition that ordinary (unprotected or even degraded) landscapes also have their value, supported by the landscape character approach. *'The fact that an area of landscape is not designated either nationally or locally does not mean that it does not have any value. This is particularly so in areas of the UK where in recent years relevant national planning policy and advice has on the whole discouraged local*

designations unless it can be shown that other approaches would be inadequate'.

- 6.6. The LVIA prepared by 4DLD is clear in its findings that development of the site would cause permanent change to the site and its wider landscape setting. This change would be damaging to both, and would be irreversible in nature. Indeed, the LVIA highlights that even changes not subject to planning law, such as a change of use from the existing pasture to an arable, cropped regime would affect the wider landscape character of the site and surrounding areas.
- 6.7. The 4DLD LVIA illustrates that the permanence of the change is significant, and that mitigation will not be successful in preserving or enhancing the landscape. Rather, the addition of built forms and infrastructure into the open countryside will detract from the integrity of the landscape character of the area, and will be an alien intrusion into the natural landform of the Corallian Ridge.
- 6.8. In addition, mitigation through planting and screening will add to the adverse effect on the landscape character which, even if it were to completely obscure the development, would only serve to draw attention to the changed landscape and setting.
- 6.9. All impacts will be visible throughout the year, and, as a lighted development, though-out the night. The LVIA is clear that these effects will affect a significant area and number of permanent and transient receptors affecting many users of the landscape throughout the seasons.
- 6.10. Additional impacts come from the changes to the existing use of the site. Currently the site is an informal community resource, acting as a recreation ground throughout the year, and used daily by dog walkers. Whilst it is a privately owned field, the site is the only publicly accessible space to the western side of Faringdon (west of the A417), and the only open space available within comfortable walking distance for most residents. (NB appellant's LVIA diagram Figure 26 includes allotments as Public Open Space (POS) - which they are not).
- 6.11. The site itself is known locally, as mentioned in the 4DLD LVIA, as 'Humpty Hill', and in this context can be described (in terms of community), as an important yet unprotected landscape. A place where people interact with nature and the seasons, to which colloquial reference has been attached
- 6.12. The topography of the site is particularly important at a human level, impacting on the value to the community. The steep slope allows, in times of snow, for sledging and winter activities, whilst the elevated northern and

eastern edges afford distant and attractive views towards the Thames Vale and the Cotswolds. The north facing aspect of the site allows snow to linger longer, extending its period for use in winter.

- 6.13. These uses are recognised to be 'permissive' in nature, as the Public Right of Way only follows the eastern boundary of the site. However, as mentioned in the LVIA, the peri-tracks around the site are evident back as far as 1999 from satellite imagery and have probably been there significantly longer.

7. Design and Access

- 7.1. I appreciate that, at this level of outline planning detail, the proposed site layout is not finalised, and that much of the site masterplan is therefore indicative at this stage. I therefore comment on the proposals in terms of their approach and the the implications of the plans, rather than the finer details of the scheme.
- 7.2. Firstly, I would question the basic site planning approach which appears to largely ignore the existing contours (see D&AS Figure 18), working across the landform rather than with it, especially on the lower parts of the site..
- 7.3. As noted, the existing average slope across the site is roughly 1 in 13, which is steep and difficult for normal pedestrian access. Although the Equality Act 2010 (which replaced the Disability Discrimination Act 1995) is not applicable in this instance for access requirements, good practice would be to model the site for as level access as practical to building entrances (Part M of the Building Regulations requires maximum cross-falls of 1 in 40 on the approach⁸ to a dwelling). This is very difficult to achieve when working across contours without either retaining structures (retaining walls, ramps and steps) or extensive softscape areas to accommodate the changes in level. Both of these options have adverse effects, the former on cost grounds, and the latter on site development capacity.
- 7.4. Working against the grain (even on shallower slopes) also fails to maximise the site's natural potential by not taking advantage of the potential views, even on the lower, more shallow part of the slope, and limiting the extent to which mitigation planting could be incorporated to reduce the impact of the development when viewed from the north and west.
- 7.5. The proposed road layout favours the most southern homes, although the new on-site vegetation will obscure views out of the site for these dwellings if allowed to mature. The northern houses will be at a variety of levels, with steep slopes between dwellings.
- 7.6. Furthermore, the circuit-like layout of the internal road will generate significant internal traffic, requiring access to all the dwellings, which will result in a conflict with pedestrians in the areas indicated as 'mews courts'. This will have an adverse effect on any attempt at producing higher quality hard landscape in these areas.

⁸ The whole, or part, or the approach may be a driveway.

- 7.7. The lack of turning facilities for larger vehicles (refuse, delivery and blue-light service vehicles) within the site will also adversely affect the quality of the public realm by necessitating a full circuit of the main roadway (including the major 'mews court') for most site visits.
- 7.8. The tight and narrow design of the internal road and footways precludes the possibility of street tree planting, which pushes any large trees (i.e. those with the potential to screen the development) to the boundaries of the site where they will be of least value in terms of the wider landscape setting.
- 7.9. Whilst probably not a 'design intent', the narrow road and minimal footpaths will inevitably lead to pavement parking, which is ubiquitous on layouts of this nature with high car-owning populations coupled with the lack of near-by facilities. The built urban forms mentioned in the D&AS (paragraphs 3.12 and 3.14) can therefore be regarded, in urban design terms, as largely unachievable as they are likely to be dominated by parked cars.
- 7.10. As mentioned previously, the existing Public Right of Way will cease to exist in its current form. Its character will change significantly, becoming a public alleyway between two housing areas. The current panoramic views will be lost, as will the connection with the wider countryside. The right of way will remain, but the context of the right will be permanently and irrevocably changed.
- 7.11. For a significant portion of its length, the PRow will become a footpath adjacent to the main site access road, with the potential for conflict between pedestrians (with dogs or children) and vehicles.
- 7.12. This key area of interface between existing site users (on foot) and new vehicle traffic is a natural location for a shared space or 'mews' design approach, but this has not been incorporated into the proposals.
- 7.13. The proposed new footpaths through the site will, to a degree, replace the existing 'permissive' tracks used at present, although they will be routed differently, and the path adjacent to the western boundary will also become an alleyway at the bottom of a line of rear gardens. The low-lying location, next to the existing hedgerow will curtail or restrict most of the available views to the west and north.
- 7.14. Whilst the proposed Public Open Spaces on the plan appear reasonable in size they will be limited by level changes, and the lower (northern) area will be dominated by the attenuation pond. This will inevitably be a steep-sided

depression on an area with significant level changes. The usable land around the pond will be unlikely to have any recreational or amenity use.

- 7.15. Regarding the lower part of the site generally, the illustrations in the Design and Access Statement (D&AS) are at variance with the overall design approach stated in paragraph 5.1, which states:
"The properties will be mixture of semi detached and detached properties, ranging from 2 - 5 bedroom dwellings and will be two storey in height."
- 7.16. The illustrations appear to suggest that the lower houses (at least) will be three storeys (figure 35), as does the top illustrative photograph accompanying the summary paragraphs (9.0)
- 7.17. Finally, the illustrations (figures 33 and 34 particularly) do much to confirm that the proposal would lead to an inappropriate extension of the existing townscape into virgin countryside on a scarp face. Illustration 36 also confirms that this extension, if built, would mirror the lost opportunities of the existing development by turning its back (the western rear gardens) on the existing landscape, and would fail to create a 'positive rural / suburban edge adjoining the countryside' as identified as an opportunity in section 4.0 of the Design and Access Statement.
- 7.18. Quite apart from all other issues of appropriateness or adverse impacts on the wider landscape as identified in the LVIA, replicating a series of existing back gardens (criticised in the D&AS) along a new boundary in open countryside seems to me to be at odds with the basic tenets of good design - and the appellant's own design rationale.

8. Conclusion

- 8.1. In conclusion, in my professional judgement, I cannot find any merit in the proposed development.
- 8.2. The site is not appropriate, or sufficiently robust in landscape terms, for development. Any changes would have a profound, permanent and irreversible impact on the nature and character of the site and the wider landscape.
- 8.3. In social landscape and human terms, the site is a valuable resource to the community. It is 'Humpty Hill', with all the associated, shared experiences, memories and cultural connotations which inform a landscape over time.
- 8.4. Development would result in an extension of the town into open countryside and would set a precedent for development of the scarp.
- 8.5. Development would appear as an unnatural extension of the townscape, past a defined edge, down the escapement slope into a rural and undeveloped landscape which is currently contained within its own topography.
- 8.6. The precedent would also lead to development pressure on land to the west of the site, with the potential for further inappropriate expansion of the town towards the wooded and historic areas to the west.
- 8.7. The inability of the site to accept even minor changes to its morphology without impacting on the wider landscape is key to its special nature as a containing landscape feature to the town.
- 8.8. This field, the proposed site, is a piece of a jigsaw puzzle which belongs to the Corallian Ridge and the Thames Vale. It is not a piece of the suburban townscape of Faringdon.
- 8.9. In closing, therefore, I would respectfully request, for the reasons given in this evidence, and the Landscape and Visual Impact Assessment that the Inspector dismisses this appeal and preserves the existing landscape setting to Faringdon, and the wider landscape.