

Our ref: 19216

15th June 2020

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REF: VISUAL IMPACT: LAND OFF OAKHURST RISE, CHELTENHAM PLANNING APPLICATION
REFERENCE: 20/00683/OUT

Dear Peter,

Thank you for forwarding the consultation response received from Friends of Charlton Kings (FoCK) dated 3rd June 2020 regarding outline planning application 20/00683/OUT. I note that the comments include references relating to visual impact and that photographs have been provided which I have reviewed and consider in my response.

The comments in the FoCK response relate to potentially longer distance views of the site from both within the Cotswolds AONB and Charlton Kings Conservation Area situated to the south, these are discussed below.

Views and visual assessment methodology

The importance of correctly representing views in landscape impact assessment in order that photographs are not misleading to both the reader and decision makers has culminated in the recently published guidance provided by the Landscape Institutes Technical Guidance Note TGN 06/19¹ Visual Representation of Development. The guidance states that, 'photography should provide a fair representation of what would likely to be seen [by the human eye] if the proposed development is implemented and should portray the proposal in scale with its surroundings'.

The application for residential development of the Oakhurst Rise site has been assessed in accordance with a professional landscape and visual methodology, please refer to Landscape and Visual Statement Final V4 24th April 2020. Where views of the site have been identified photographs from these locations have been reproduced within the report in accordance with the guidance contained in TGN 06/19.

In all instances where potential views and accompanying photographs are identified in the FoCK consultation response these are not presented in such a way, or in accordance with a stated methodology or professional guidance, where an objective assessment of visual harm can be reached.

Views from the Cotswolds AONB

Reference is made in the FoCK response to the site being visible from within the Cotswolds AONB. Photographs of views are provided from within the AONB at Charlton Kings Common.

The landscape assessment work undertaken in March 2020 considers views from these locations which are numerous, given Cheltenham's proximity to the western edge of the Cotswolds AONB. It is important to note that the issue here is not whether development is 'seen' from the AONB but is whether the development would cause 'harm' to the landscape and scenic beauty of the AONB. The concerns raised in

¹ https://landscapewpstorage01.blob.core.windows.net/www-landscapeinstitute-org/2019/09/LI_TGN-06-19_Visual_Representation.pdf

the FoCK response are therefore unsubstantiated when considered against professional landscape and visual assessment that accompanies the application.

Views from the Charlton Kings Conservation Area

Reference is made in the FoCK response to the site being above the build line of Cheltenham and visible from a range of entry points in Charlton Kings. Photographs are presented from the A435, Old Bath Road and adjacent to St Marys Church within the Conservation Area. The FoCK response makes reference to a framed view from the Charlton Kings Conservation Area and that the view would be dominated by the high rooflines of new development above the existing tree line and proposed screening.

In response to these comments I would note that the elevated nature of the site makes it potentially visible from a number of locations within the town, its context is predominantly residential, with existing dwellings immediately to the north, west and east of the site. Proposed built form is not raised above that of the adjoining land to the north which comprises existing residential dwellings and is on elevated land above that of the site. Due to the settled nature of both the immediate context of the site and the viewpoint locations within the town, the potential visual impact and resulting harm to views will be substantially lessened. Whilst residential development of the site would result in a degree of change to the existing glimpsed views from within the town and the Conservation Area, due to the location and context of the site this change is assessed to not cause significant harm to existing views from these locations.

I trust the response provided is clear in assuring Cheltenham Borough Council that the potential visual impacts resulting from the proposed development of the site has been fully considered and assessed, in accordance with professional guidance and relevant provisions of national and local planning policy.

Yours Sincerely,



Ben Davies
CMLI

Associate Director