

**Land west of Lutterworth Road, Brinklow
Brinklow Parish Council**

LANDSCAPE & VISUAL OUTLINE APPRAISAL Rev A

December 2020

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Job No.: **1605.1**

Client: **Brinklow Parish Council**

Document issue schedule:

Date	Status	Revision	Author	Checked
20/10/20	First draft		PB	DP
04/12/20	Final version		PB	
10/12/20	Final version	A	PB	

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1.0 INTRODUCTION

1.1 Purpose and scope of the report

- 1.1.1 Brinklow Parish Council are preparing a draft Neighbourhood Plan for Brinklow, a village c.4.5km to the east of Coventry, and within the Plan, the Parish Council wishes to allocate a site at Lutterworth Road at the northern end of the village, for development. The specific purpose of the proposed residential development would be to deliver affordable and elderly persons' housing. As the site in question lies within designated Green Belt, the proposed development is being promoted as a Rural Exception Site.
- 1.1.2 Following consultation with the local planning authority (Rugby Borough Council) on matters relating to landscape, Glenkemp Ltd. has been commissioned by Brinklow Parish Council to provide an independent high level review of the potential landscape and visual effects that might result from development of the site in question for the purpose identified.
- 1.1.3 As well as providing an overview of anticipated landscape and visual effects in line with standard practice, the scope of this Landscape and Visual Outline Appraisal (LVA) has been modified to address specific matters identified as being pertinent to the proposal by the Borough Council planning officer Mr R McKee in his correspondence with the Parish Council dated 6 August 2020. Although it was noted that a full Landscape and Visual Impact Assessment would not be necessary at this stage, it was recommended that consideration should be given to specific landscape matters and these are listed as follows:
- i. Assess the proposed development site against the reasons the site was rejected previously by the Council in the 2016 SHLAA (Strategic Housing Land Availability Assessment);
 - ii. Assess the site against the reasons the Local Plan Planning Inspector gave for removing a neighbouring proposed residential development site from the draft Plan;
 - iii. Consider potential impacts on the local street scene;
 - iv. Review potential loss of trees and hedgerow on site (reference the Brinklow Site Allocations Development Pack, June 2016, Site No. S16075);

- v. Consider issues of coalescence and ribbon development (reference the Brinklow Site Allocations Development Pack, June 2016, Site No. S16075);
- vi. Consider potential effects on views gained when approaching the village from the north;
- vii. Consider potential impacts on views of the site from within the wider area, particularly from the west.

1.1.4 This report first sets out the methodology upon which the landscape and visual appraisal has been based. It is important that the methodology employed is transparent if the findings are to be interpreted correctly by the reader. In the case of a full Landscape and Visual Impact Assessment (which might be either part of a formal Environmental Impact Assessment or a stand-alone report), both the nature of the landscape / visual receptor and the anticipated magnitude of change resulting from the development are analysed and by combining these two factors, a level of significance of effect (which may be positive or adverse) is predicted. However, in a Landscape Appraisal such as this where analysis of the landscape and visual effects is focussed on comparatively specific key themes, there is no requirement to identify the 'significance' of effect. Consequently, the method of assessment used, while remaining within established guidelines, is generally less formal.

1.1.5 A baseline study of the physical landscape of the site and its setting provides an overview of landscape character and landscape features on and around the proposed development site. From such an audit, the more valued landscape receptors that could be directly or indirectly affected and physically altered by the development proposals are identified and the nature of potential landscape effects is considered. Potential measures which would help mitigate the effects identified are noted.

1.1.6 In assessing visual effects, this report identifies and examines the nature of the public and private views from the surrounding area which could be affected by the proposed development and predicts the magnitude of the 'degree of change' in the view.

1.1.7 The potential landscape and visual effects are identified and, where relevant, reference is made of how mitigation measures can be used to minimise any potential adverse effects on landscape or visual amenity.

1.1.8 This assessment has been undertaken by a Chartered Member of the Landscape Institute.

1.2 Site context

(See Figures 1 and 2)

1.2.1 The 1ha site is located at the northern end of the village of Brinklow, 4.5km to the east of the city of Coventry, and 2km from the M6 motorway which runs on an east – west alignment to the north. This historic and picturesque village has a predominantly linear form, following the line of the B4428 northwards from its junction with the B4455. In more recent times the settlement has expanded to the west on the south side of the B4428. In general terms, the village lies within an open agricultural landscape.

1.2.2 The site in question is located on the west side of Lutterworth Road (B4428) near the northern end of the village. It reads as a series of small fields (one previously functioning as site for a clay extraction) just outside the defined settlement boundary (but within the village's 30mph speed restriction zone) in a break between the main settlement and an outlying cluster of 11no. residential properties and a cemetery, which have grown along the roadside (predominantly on the west side). Directly opposite the site on the east side of Lutterworth Road is a field in arable production.

1.2.3 The site itself comprises 3no. former individual fields now managed as a single unit for the occasional grazing of sheep.

1.3 Outline description of the proposed development

(See Figure 4).

1.3.1 The current indicative development masterplan for the site delivers a specific housing mix informed by a housing needs survey undertaken by Midlands Rural Housing (June 2019). It contains a total of 20no. dwellings: 12no. affordable units, 7no. for elderly residents and 1no. 'open market' property.

1.3.2 Access to the site is gained off Lutterworth Road at a point defined by an existing field gate.

1.3.3 Within the indicative site layout plan, allowance has been made for areas of new native structure planting.

2.0 ASSESSMENT METHODOLOGY

2.1 Introduction

- 2.1.1 The methodology for this outline LVA is based on the 'Guidelines for Landscape and Visual Impact Assessment', Third Edition: 2013 (GLVIA 3, 2013), edited by the Landscape Institute and the Institute of Environmental Management and Assessment. While the accepted methodology for LVIA work is now reasonably well established, qualitative judgements and a degree of subjectivity remain a critical part of LVIA with regard to gauging the importance of identified effects for example, or identifying impacts on perceptual aspects of landscape character. This section of the LVA sets out the framework upon which the assessment has been made.
- 2.1.2 The level of importance ascribed to landscape and visual effects depends primarily on the interaction between, and combination of, the *sensitivity* of the landscape or visual receptor and the *magnitude* of the predicted effects of the development.
- 2.1.6 The *sensitivity* of the landscape is a combination of its 'susceptibility' to change as a result of the specific type of development being assessed, and its 'value'. In considering the *magnitude* of change, judgements need to be made about the size and scale, geographical extent and the duration and reversibility of the effect identified.

2.2 Landscape effects

- 2.2.1 The GLVIA defines the assessment of **landscape effects** as "*assessing effects on the landscape as a resource in its own right.*" Components of the landscape that are likely to be affected by a proposed development are referred to as *landscape receptors* and can include individual elements or features, overall character and key characteristics and aesthetic or perceptual aspects. Landscape effects derive from changes in the physical landscape which may give rise to changes in its character and how this is experienced. This may in turn affect the perceived value ascribed to the landscape.
- 2.2.2 The objective of the baseline study of the physical landscape of the development site and its setting is to assemble a comprehensive audit of those landscape features and aspects of landscape character on and around the proposed development site that could contribute to a distinct 'sense of place'. From such an audit, the more valued landscape receptors that could be directly or indirectly affected and physically altered by the development proposals are identified.

2.2.3 The sensitivity of a landscape feature is a function of its quality, rarity, the contribution it makes to landscape character, and the degree to which it can be replaced or replicated, together with any cultural associations that might be relevant. The sensitivity of landscape character will reflect the physical and perceptual attributes of the landscape and will include: landform; scale; the degree of openness; landscape pattern; the extent of human influence; land use; the degree of remoteness or wilderness; the degree of tranquility; landmarks or features of cultural significance; condition; rarity; the value placed on the landscape including designations, and scenic quality.

2.2.4 In assessing the *value* of a specific landscape, the GLVIA advises that the following aspects should be considered (although it should be noted that this is not an exclusive list):

- **Landscape quality (condition)** – a measure of the physical state of the landscape and its components and / or the extent to which typical characteristics are present.
- **Scenic quality** - a term used to describe a landscape's appeal to the (predominantly visual) senses.
- **Rarity** - the extent to which landscape elements or characteristics are unique or particular to a specific geographical area.
- **Representativeness** - whether the landscape contains particular character and / or elements which are considered particularly important examples.
- **Conservation interests** - the presence of biodiversity, geological interest or archaeological, historic or cultural interest can add value to a landscape as well as having value in their own right.
- **Recreational value** - formal or informal recreational opportunities involving engagement with the landscape or particular physical attributes.
- **Perceptual aspects** - a landscape may be valued for its perceptual qualities, particularly those associated with personal well-being such as tranquillity or escapism.
- **Cultural associations** – landscapes associated with famous individuals such as artists or writers, or which are linked to notable historic events.

2.2.5 To assist the understanding of landscape value, landscape designations over a study area defined by a 1km radius from the centre of the site were identified using Defra's 'MAGIC' web-based data base.

2.3 Visual effects

- 2.3.1 The Guidelines define the assessment of **visual effects** as “*assessing effects on specific views and on the general visual amenity experienced by people.*” People who will be affected by changes in views or visual amenity are referred to as *visual receptors* and visual effects relate to the changes that arise in the composition of available views as a result of changes to the landscape, to people’s responses to the changes, and to the overall effects with respect to visual amenity.
- 2.3.2 The sensitivity of a visual receptor is defined by the type of viewer (taking into account the expectation and activity of the receptor), the duration of exposure to the view, the angle of view and the factor of distance. It also takes into account the importance of both the view itself and the point from which the view is experienced. It should be noted that it is the visual receptor (ie. the person experiencing the view) who is sensitive to change and not the point from which the view is experienced (such as a Public Right of Way, road, or private property). Consequently, the number of people affected by a visual effect does not in itself alter the sensitivity of the receptor group, although it may be a factor to be taken into account when giving weight to the significance of specific visual effects when making a balanced assessment.

2.4 Magnitude of change

- 2.4.1 The *magnitude* of physical or visual change is a function of three factors: the scale of change; its anticipated duration, and whether the change is reversible. The change should also be assessed in terms of whether it is adverse, beneficial or neutral in its effect.
- 2.4.2 Impacts may be short term (or temporary), essentially related to changes evident during the construction period of the proposed development, or longer term (or comparatively permanent) resulting in changes in landscape character and to the perception of that landscape after final construction. With regard to the duration of effects, in this assessment ‘*long term*’ is used to describe a period of 8+ years; ‘*medium term*’ between 3 and 8 years, and ‘*short term*’ between 1 and 3 years.

2.5 Survey area

- 2.5.1 The extent of the survey area used for the purpose of assessing landscape and visual effects was defined initially as a result of a desk top exercise. Observations made during the course of fieldwork indicated that this study area was generally adequate for identifying the key potential landscape and visual receptors, but that a slight expansion

of the study area was required to the west as far as the junction of Smeaton Lane and the B4029.

- 2.5.2 Site survey work was carried out in September when deciduous vegetation was in full leaf and the screening effects of such vegetation was at its highest level. All assessment work was restricted to that which could be undertaken from publicly accessible viewpoints.

3.0 LOCAL PLANNING POLICY CONTEXT RELATING TO LANDSCAPE

3.1 Introduction

3.1.1 This section provides a brief review of existing local planning policies and related documents which are directly relevant to landscape issues relating to the proposed development. In preparing this report, the following documents have been consulted:

- *Rugby Borough Council Local Plan 2011-2031 (June 2019) and accompanying Policy Map.*
- *Rugby Borough Local Plan, Inspector's Report 27 March 2019*
- *Warwickshire Landscape Guidelines (November 1993)*
- *Landscape Assessment of the Borough of Rugby – Sensitivity and Condition Study (2006)*
- *Landscape Sensitivity Study for Binley Woods; Brinklow; Long Lawton; Ryton-on-Dunsmore; Stretton-on-Dunsmore; Wolston & Wolvey (August 2016), by Warwickshire County Council for Rugby Borough Council*
- *Brinklow Site Allocations Development Pack (June 2016)*
- *Brinklow Neighbourhood Plan: Site Options and Assessment (March 2020), by AECOM for Brinklow Parish Council*

3.2 Rugby Borough Council Local Plan 2011-2031 (June 2019)

3.2.1 The following policies are noted as being directly relevant to landscape and visual matters.

Policy.GP2: Settlement hierarchy – Development will be allocated and supported in accordance with the following Settlement Hierarchy, as defined on the Policies Map:

Green Belt - New development will be resisted; only where national policy on Green Belt allows will development be permitted.

Policy NE1: Protecting Designated Biodiversity and Geodiversity Assets –The Council will protect designated areas and species of international, national and local importance for biodiversity and geodiversity as set out below. Development will be expected to deliver a net gain in biodiversity and be in accordance with the mitigation hierarchy below. Planning permission will be refused if significant harm resulting from development affecting biodiversity cannot be:

- Avoided, and where this is not possible;

- *Mitigated, and if it cannot be fully mitigated, as a last resort;*
- *Compensated for.*

Policy NE3: Landscape Protection and Enhancement - *New development which positively contributes to landscape character will be permitted. Development proposals will be required to demonstrate that they:*

- *Integrate landscape planning into the design of development at an early stage;*
- *Consider its landscape context, including the local distinctiveness of the different natural and historic landscapes and character, including tranquillity;*
- *Relate well to local topography and built form and enhance key landscape features, ensuring their long term management and maintenance;*
 - *Identify likely visual impacts on the local landscape and townscape and its immediate setting and undertakes appropriate landscaping to reduce these impacts;*
 - *Aim to either conserve, enhance or restore important landscape features in accordance with the latest local and national guidance;*
 - *Address the importance of habitat biodiversity features, including aged and veteran trees, woodland and hedges and their contribution to landscape character, where possible enhancing and expanding these features through means such as buffering and reconnecting fragmented areas; and*
 - *Are sensitive to an area's capacity to change, acknowledge cumulative effects and guard against the potential for coalescence between existing settlements.*

Policy SDC2: Landscaping - *The landscape aspects of a development proposal will be required to form an integral part of the overall design. A high standard of appropriate hard and soft landscaping will be required. All proposals should ensure that:*

- *Important site features have been identified for retention through a detailed site survey;*
- *Features of ecological, geological and archaeological significance are retained and protected and opportunities for enhancing these features are utilised (consideration will also be given to the requirements of policies NE1 and SDC3 where relevant);*
- *Opportunities for utilising sustainable drainage methods are incorporated;*
- *New planting comprises native species which are of ecological value appropriate to the area;*
- *In appropriate cases, there is sufficient provision for planting within and around the perimeter of the site to minimise visual intrusion on neighbouring uses or the countryside; and*

- *Detailed arrangements are incorporated for the long-term management and maintenance of landscape features.*

Policy SDC3: Protecting and Enhancing the Historic Environment - *Development will be supported that sustains and enhances the significance of the Borough's heritage assets including listed buildings, conservation areas, historic parks and gardens, archaeology, historic landscapes and townscapes. Development affecting the significance of a designated or non-designated heritage asset and its setting will be expected to preserve or enhance its significance.*

3.3 Rugby Borough Local Plan, Inspector's Report 27 March 2019:

3.3.1 In the section of the Inspector's Report covering Brinklow (pages 52-54) the Inspector considers the potential landscape and visual effects of a potential allocation of land for the development of up to 100 dwellings at a site (DS3.7) off Lutterworth Road, to the east of the site being assessed in this report. Given that he found that the allocation failed to: i) take account of the intrinsic character and beauty of the countryside; ii) would cause significant harm to the openness and purpose of the Green Belt around Brinklow; iii) would cause harm to the setting of the Conservation Area; and iv) would be detrimental to the setting of the Motte and Bailey castle Scheduled Monument, the observations he makes in terms of landscape and visual impacts are listed here as they may be of direct relevance to the proposed development site now being considered on the west side of Lutterworth Road. The key factors listed are:

- The site being detached from the existing settlement edge;
- A strong urbanising effect on an otherwise attractive rural landscape;
- Visibility of the site in views from the north and the west, in particular from the Fosse Way on the approach to the village; from Lutterworth Road, and from the PRoW leading to the canal towpath.
- Urban encroachment into the countryside;
- Potential harm to the historic relationship between the rural area and the village;
- Size and form of the development being discordant with the historic linear form and character of Brinklow;
- Impact on the approach to the village and the setting of the Conservation Area;
- The urbanisation of views gained across the countryside from the castle.

3.4 Landscape Sensitivity Study for Binley Woods; Brinklow; Long Lawton; Ryton-on-Dunsmore; Stretton-on-Dunsmore; Wolston & Wolvey (August 2016):

3.4.1 The proposed development site lies within a much larger landscape unit identified as Zone BK_07 which is assessed on pages 52-54 of the report. The site is located at the southern end of the Zone BK_07 which is shown to extend much further to the north west (see Figure 5).

3.4.2 Within a site description, the study notes that the larger Zone BK_07 functions as a transition between settlement and wider farmland and that the smaller hedged fields are a special feature of the landscape around Brinklow (ref. Warwickshire Landscapes Guidelines for Dunsmore). Roadside and internal hedgerows are relatively intact and these define the sense of scale and pattern of this landscape. Although the Zone is enclosed, tree cover is limited to within the hedge lines and around a field pond. The majority of the Zone is either a designated Local Wildlife Site (LWS) covering semi-natural grasslands and marsh, or has the potential to be a LWS.

3.4.3 Under the sub-heading '*Potential for housing / commercial development*' the study grades the Zone as being '*highly sensitive*' and states the following:

'This zone would be inappropriate for development due to its small scale, pastoral qualities which act as a transition between the settlement and wider farmland and connects with the stream corridor of Smite Brook. The majority of the zone also lies within a Local Wildlife or potential Local Wildlife Site. The roadside hedge, with its scattered trees, is a primary hedgeline in good condition and should be safeguarded.'

Despite the assessment process in the above document being based on a much larger landscape unit, features of which are fundamentally different to the proposed development site in several key aspects, the study concludes that the specific application site ref. S16075 (which covers most of the proposed development site being assessed in this report) would not be appropriate for development.

3.4.4 Other landscape characteristics of note for BK_07 include: high cultural sensitivity; moderate visual sensitivity; key views are of a small scale pastoral landscape and are generally enclosed in nature; intervisibility is low and the Zone is generally quite enclosed by trees, vegetation and the settlement, although there are views into the neighbouring Zone BK_09 to the west; medium tranquility rating; small scale pastoral fields provide a transition from the settlement to the wider farmland and contribute

positively to an indented, soft settlement edge; the settlement edge is soft and indented where it abuts this Zone.

3.5 Warwickshire Landscapes Guidelines (1993):

- 3.5.1 Brinklow is located within the *Dunsmore Parkland* Landscape Type within the wider *Dunsmore* regional Landscape Character Area. The general character of the Dunsmore Parklands is described in the study as: “an enclosed, gently rolling estate landscape with a strongly wooded character defined by woodland edges, parkland and belts of trees,” and its key features include: middle distance views enclosed by woodland edges; belts of mature trees associated with estate lands; mature hedgerow and roadside oaks.
- 3.5.2 The principle ‘management strategy’ identified for the Landscape Type is to “maintain and enhance the enclosed wooded character of the landscape.” The most relevant ‘landscape guidelines’ includes: strengthening the wooded character of streamlines and primary hedgelines through replanting or natural regeneration, and conserve and restore all primary hedgelines and manage them more positively as landscape features. The study notes that smaller hedged fields are a special feature of the landscape around Brinklow and in this area, hedgerow management should be a priority.

3.6 Landscape Assessment of the Borough of Rugby – Sensitivity and Condition Study (2006):

- 3.6.1 This study builds on the landscape character assessment work done in the earlier county wide assessment (see section 3.5 above) and focuses specifically on the landscapes within the Borough of Rugby (which includes the area around Brinklow) and the issue of landscape sensitivity.
- 3.6.2 The study defines Landscape Sensitivity as: “a measure of the degree to which the countryside can accept change without causing irreparable, long-term damage to the essential character and fabric of the landscape – the term ‘change’ being used in this context to refer both to potentially beneficial change, such as new woodland planting, as well as change brought about by new development.”
- 3.6.3 To summarize, the study assesses the landscape around Brinklow (ie. the Dunsmore Parklands) as being of ‘moderate’ fragility, ‘moderate’ to ‘low’ visibility (depending on

the level of local tree cover) and of 'moderate' overall landscape sensitivity. Its condition is identified as being generally in decline.

3.7 Brinklow Site Allocations Development Pack (June 2016):

- 3.7.1 Appendix One of the above report contains the Site Assessment Tables for identified potential development sites around Brinklow to inform the Local Plan site allocation selection process. The report relies heavily on the landscape character assessment work undertaken as part of the Warwickshire Landscape Guidelines study and the more recent Landscape Sensitivity Study 2016. For the proposed development site (site ref. S16075) it notes that: *"there are no barriers to the west of the site that prevent encroachment into the countryside."* By way of summary, it concludes that: *"This zone would be inappropriate for development due to its small scale, pastoral qualities which act as a transition between the settlement and wider farmland and connects with the stream corridor of Smite Brook. The majority of the zone also lies within a Local Wildlife or potential Local Wildlife Site. The roadside hedge, with its scattered trees, is a primary hedgeline in good condition and should be safeguarded. Therefore the site would not be appropriate for development."* **However, it is clear in this summary, that the report is referencing the larger Zone BK_07 (see Fig:5 of this report) as assessed in the 2016 Landscape Sensitivity study rather than the much smaller proposed development site itself.**

3.8 Brinklow Neighbourhood Plan: Site Options and Assessment (March 2020):

- 3.8.1 This more detailed assessment of the viability of selected sites around Brinklow references the proposed development site as 'Site 8'. In the review of 'environmental constraints' the site is listed as being of 'high sensitivity' in terms of landscape and of visual amenity, indicating that the site is considered to have: *"highly valued features, and / or valued features that are highly susceptible to development. The site can accommodate minimal change."* The assessment review comments that: *"The site is visually open and has high intervisibility with the surrounding landscape. The area where the site is located is in the "zone BK_07", described as having high sensitivity to urban development according to the Landscape Sensitivity Study published in 2016."*

Once again, it appears that characteristics defined for the larger landscape unit BK_07 are being erroneously attributed to the smaller area of the proposed development site now under consideration. The notable differences are:

- i) The development site (Site 8 in the above document) does not connect with the Smite Brook corridor;
- ii) It does not lie within a Local Wildlife Site or potential LWS;
- iii) The site is not considered to have high intervisibility with the surrounding landscape.

4.0 BASELINE LANDSCAPE

4.1 Introduction

4.1.1 The process of establishing the baseline landscape involves a combination of desk – top study and fieldwork. According to the GLVIA, the intention should be “to identify and record the character of the landscape and the elements, features and aesthetic and perceptual factors which contribute to it.” The value attached to the landscape in question should also be considered.

4.1.2 The history of the landscape and the resultant relationship between people and places, should be taken into account in a baseline landscape assessment. It may have a notable influence on the value which is attached to a specific landscape in question.

4.2 Local landscape and site environs

(See Figures 1 and 2)

4.2.1 The historic village of Brinklow sits within the Dunsmore Parklands Landscape Type, characterised by a gently rolling topography with a strongly wooded pattern of vegetation cover throughout the otherwise open agricultural landscape. The landscape setting to the northern end of the village where the proposed development site is located is typical of the Landscape Type, with medium sized field which generally have hedged boundaries, some with hedgerow trees. To the north of the village there are a number of transport routes, namely: the M6 Motorway (2km); a railway (0.8km) and the Oxford Canal (0.7km), the latter of which passes under the B4428 and turns southward to run to the east of the village. The ‘Brinklow Arm’ of the canal (now unused) connects the village with the main canal.

4.2.2 Brinklow is a village with a strong linear form extending from the ‘T’ junction at the southern end of the village all the way up to the northern end. Within the village, key heritage / cultural landmarks of note are the Motte and Bailey castle and the church of St. John the Baptist, as well as a distinctive linear village green between the main road through the settlement and The Crescent. The Brinklow Conservation Area is c.150m from the proposed site at its closest point.

4.2.3 At the northern end of the village, c.100m beyond the official settlement boundary as defined in the Local Plan, lies a cluster of 11no. residential properties fronting on to the road, arranged in a single line on the west side of Lutterworth Road. On the opposite side of the road is a large single dwelling, a small pumping station and a cemetery.

Although physically separated from the main settlement by open fields, these outlying properties read as part of the village and do lie within the boundary defined by the roadside verge sign bearing the village place name and marking the start of the 30mph speed limit through the settlement. There is no perception that this cluster represents a distinct or historic sub-settlement on the outskirts of the main village. When travelling along Lutterworth Road, either heading into the village or away from it, at the point where the 'green gap' separating the main village from the northern cluster is reached, views of built development on the far side of the green gap are visible so as to maintain a sense of travelling 'within the village'. Consequently, one's perception of the footprint of the settlement effectively 'bridges' the gap.

- 4.2.4 To the north west of the site lies a designated Local Wildlife Site (LWS) and it is noted that the long thin field unit immediately to the west of the proposed development area has been identified as having the potential to be designated as a new LWS.
- 4.2.5 In terms of informal recreational opportunities in the vicinity of the northern end of the village, in addition to the canal (actively used by narrow boats) and its tow path, there is a PRoW along the Smite Brook. The Coventry Way long distance footpath also passes within c.0.8km of Lutterworth Road to the west.

4.3 Landscape of the development site

(See Figure 3)

- 4.3.1 The development site itself comprises three distinct grassed field units of varying size and shape:
 - i) The northernmost field is long and narrow and has functioned in the recent past (until at least the mid 1960's) as a clay quarry and contained associated timber structures at its eastern end, the site of the latter being marked on site by overgrown patches of building debris;
 - ii) the central field is the largest of the three and is roughly square in shape;
 - iii) the smallest square field is located at the south western corner of the site and contains a small derelict brick structure possibly originally with a horticultural or agricultural function. All three fields are accessed via a single field gate off Lutterworth Road, located at the eastern end of the northern field.
- 4.3.2 The site's northern boundary is shared with the curtilage of a neighbouring dwelling along its eastern half and with a grassed paddock along its western half, the latter of which is defined by a post and wire fence and over-mature hawthorns – remnants of a former hedge. The western site boundary is defined by a virtually continuous, tall and

unmanaged but reasonably dense native species hedge with notable hedgerow trees, large specimen shrubs and a high proportion of ivy. Beyond this site boundary to the west lies a long, narrow, mown grass paddock before the landscape opens out into farmland further to the west.

- 4.3.3 The site's southern boundaries are shared with the gardens of neighbouring houses at the south eastern corner and a private access track on its western end. These are defined in part by hedges. The eastern boundary is shared with Lutterworth Road and is defined along its whole length by a dense hawthorn hedge managed at a height of 2-3m with notable hedgerow trees towards the southern end. In the south eastern corner of the main central field there is an old field gate in a state of disrepair.
- 4.3.4 Within the site, a former hedgeline (now defined by groups / individual over-mature hawthorn hedge plants 5-6m high) marks the boundary between the two larger field units. This boundary line also incorporates two distinct groups of mature and semi-mature ash trees. The boundary between the central and southernmost field units is in part marked by a short section of unmanaged mature hawthorn hedge. These internal hedgerows are of local value in that they perpetuate the pattern of small field units typical of the linear settlement pattern along Broad Street and Lutterworth Road. The mature trees within the site are also of note as they are in keeping with the pattern of tree cover within the wider local agricultural landscape.
- 4.3.5 The landscape character of the site itself is reasonably open within the site boundaries, but the site is largely enclosed by the vegetation cover along those boundaries resulting in a strong sense of containment. The visible presence of neighbouring houses to the north and south, and the sound of traffic on Lutterworth Road, notably dilutes any perception of a rural landscape character generated by the rough pasture.

4.4 The contribution of the existing site to local landscape character

- 4.4.1 The role the site plays in contributing to the existing landscape character and street scene can be assessed in terms of the following:
- i) *The contribution to the landscape of the road corridor and the visual character of the village:* The dense hedge along Lutterworth Road provides an attractive setting to the road corridor and is seen to correspond with the green gap in development on the opposite side of the road. That said, the break in the linear form of residential development fronting on to Lutterworth Road on its western side reads in the landscape as being incidental, and is not a particularly strong feature or characteristic of this northern end of the village. The field units of the site are typical of the smaller

plot sizes fronting on to Broad Street and Lutterworth Road for the whole length of the village, and virtually all of which contain buildings of some description.

ii) *The role played by the site in defining the landscape character of the wider rural landscape to the west:* When seen from the road corridor, there are no notable views across this site out into the more open landscape to the west and therefore it's contribution to an appreciation of the wider landscape beyond is negligible. Where very limited views into the site are possible, and during times of the year when deciduous vegetation is not in leaf and there may be heavily filtered views into the site from Lutterworth Road. The fields within the site read as self contained units, segregated from the wider landscape by the strong vegetation cover on the western boundary. Similarly, when viewed in plan, the field units making up the site relate more to the built settlement pattern rather than the wider agricultural landscape from which they are physically separated by the long thin paddock to the west which functions as a landscape buffer between the site and the broader rural setting.

iii) *The role of the site in defining the perception of the settlement boundaries:* As noted above, the break in linear settlement pattern between the main village and the cluster of outlying properties to the north appears to be incidental rather than a characterful response to the physical landscape or to a historically significant pattern of settlement evolution. It is noted that in the *Landscape Sensitivity Study (August 2016)* reference is made to this gap having a role in generating "an indented, soft settlement edge", the implication being that the legible settlement edge extends north beyond the gap and incorporates the detached cluster of properties to the north of the proposed development site. As for defining a 'soft' settlement edge, it is suggested that it is the well vegetated western boundary to the site and to the neighbouring plots to the north and the south which generates this visual characteristic rather than the open space within the site itself. On this point, when seen in plan on an aerial photograph of the village, the western boundary of the proposed development site is seen to form part of a much longer hedgeline which extends north beyond the separate cluster of houses, and south as far as The Crescent, and which reads as the principle boundary between the settlement and the wider countryside beyond.

5.0 BASELINE VISUAL PROFILE

(See Figure 3)

5.1 Introduction

5.1.1 The assessment of visual effects considers the effects of change as a result of a development on the views available to people and to their visual amenity. In order to assess how views experienced by visual receptors might change in content and / or character, the existing visual baseline needs to be established.

5.1.2 The GLVIA states that a visual baseline assessment should establish:

- the area from which the development may be visible;
- the different groups of people who may experience views of the development;
- the viewpoints where they will be affected;
- the nature of the views at those points.

5.1.3 It is also important to comment on the relative number of different groups of people who might be affected while appreciating that assessing the visual effects is not simply a quantitative process.

5.1.4 Interrelationships with objects or landscapes with particular cultural or heritage associations should be identified in a visual baseline assessment, with consideration being given both to views to and from identified assets. The 'setting' of a heritage asset is defined in the NPPF as "The surroundings in which a heritage asset is experienced..." While effects on setting can be considered within a LVA, an assessment of the visual effects of a development on the setting of a heritage asset is carried out using a specific methodology and should generally be undertaken by a specialist cultural heritage expert.

5.2 General

5.2.1 In broad terms the proposed development site has a low visual profile as a result of the combination of topography and local vegetation cover, in particular the hedges along the site boundaries. The following potential visual receptors have been identified through a combination of a desk top study backed up by fieldwork. (See also photographic views in Figures 6i-iv.)

5.3 View from local roads

- 5.3.1 The only road from which there are any meaningful views of the site is Lutterworth Road itself, and from this road the site is substantially screened by the hedge along the highway boundary (Fig.1 & Fig.6i: VP1). There are no landmark features of particular note to draw the eye towards the site when travelling along the road in either direction, and any longer distance views sought from the road corridor are currently more readily gained on the east side of the road. There are no views of the site from Fosse Way on the approach to the village from the north.
- 5.3.2 In the very limited views south across the wider agricultural landscape from Smeaton Lane at the point where the road passes under the railway and canal, the site is indistinct in the broader view towards the village (Fig.1 & Fig.6i: VP2). From the B4029 just south of the junction with Smeaton Lane it is just possible to make out the small gap in the line of residential development on the western village boundary (Fig.1 & Fig.6ii: VP3), but it is very indistinct, forming a small part of a wider panorama, and has little relevance to the manner in which the settlement is interpreted within its landscape setting.

5.4 Views from local Public Rights of Way

- 5.4.1 There are no views of the proposed development site from the PRoW following the course of Smite Beck to the east of Fosse Way. Along the same path following the stream to the west of Fosse Way, views of the site are generally screened or heavily filtered by vegetation cover along the banks of the water course. Where small breaks do occur (Fig.1 & Fig.6ii: VP4), views of existing rooftops nestled within mature tree cover on the western edge of the village are possible, but the proposed development site is indistinct in the view.
- 5.4.2 Similarly there are no views of the site from the PRoW to the west of the village due to intervening vegetation cover (Fig.1 & Fig.6iii: VP5), and there is a high, very dense hedge along the full length of the section of the Coventry Way running to the west of the site between the village and Smeaton Lane which completely screens views eastwards at any time of the year (Fig.1 & Fig.6iii: VP6).

5.5 Views from neighbouring residential properties

- 5.5.1 The view of the site from neighbouring residential properties to the north and the south are limited in extent. Approximately 7no. properties have upper floor views of the site (most being acute or filtered views) and of these, 3no. properties have direct ground floor views, some of which are filtered by garden vegetation.

5.6 Sites of heritage, cultural or community significance

- 5.6.1 There are no meaningful views of the site from the top of the Motte and Bailey castle to the south (Fig.1 & Fig.6iv: VP7) or from the footpaths within this Scheduled Ancient Monument site. There are no views of the site from the Conservation Area nor does the site feature in any notable views of the Conservation Area from viewpoints within the surrounding landscape.
- 5.6.2 Although elevated in relation to the proposed development site, dense woodland screens any views westward towards the site from the towpath along the Oxford Canal as it passes to the east of the village. Similarly, any views south across the open landscape towards the village from the elevated section of the canal in the vicinity of Smeaton Lane, are heavily filtered / screened by dense vegetation on the canal embankments (Fig.1 & Fig.6iv: VP8). Filtered medium to long distance views of the edge of the village may be possible when deciduous vegetation is not in leaf, but the area of the proposed development site is indistinct within the wider view.

6.0 POTENTIAL EFFECTS

6.1 Introduction

- 6.1.1 Within this section the anticipated effect of the proposed development on both landscape and visual receptors is assessed in outline and where appropriate, mitigation measures are identified.

6.2 Detailed description of the proposed development

- 6.2.1 An indicative site layout is illustrated in Figure 4 and while it serves to demonstrate key design principles for the development of the site, it is understood that a more detailed site layout would be prepared by the selected developer who would be responsible for submitting a planning application. The layout shows 20no. residential units and of these, 7no. would be bungalows and the remainder would be two storey houses.
- 6.2.2 The masterplan has been developed on the principle that existing specimen trees and hedges within the site would be retained as much as possible, with hedge removal being restricted to that which is required in order to form the new site entrance at the location of the existing northernmost field gate, and to construct roads linking the three field units. As a consequence of this key constraint, the site layout reflects the form of the individual fields. New properties are also shown set back from the boundary with Lutterworth Road.
- 6.2.3 The site plan illustrates how a belt of new native structure planting could be delivered to reinforce the existing vegetation cover along the site's western boundary.

6.3 Landscape effects

Landscape features:

- 6.3.1 All mature specimen trees on the site are to be retained as are all the boundary hedges. Only short sections of hedge (most notably either side of the existing field gate) would be removed to facilitate access into and through the site. The condition of the main internal hedge would be improved through appropriate management and new planting.
- 6.3.2 The existing brick and timber structure at the southern end of the site would be demolished but this is noted as having little landscape value.
- 6.3.3 On balance, the condition of the landscape infrastructure on site would be strengthened and improved.

Landscape character of the site and immediate environs:

- 6.3.4 As the existing hedge along Lutterworth Road could mostly be retained, and there is scope to have the easternmost proposed new properties set well back from the site boundary, it is considered that sensitive development of the site and the resulting scale of change in the landscape would have little adverse effect on the visual character of the road corridor. The introduction of appropriately designed houses within a well vegetated setting could be in-keeping with the character of the existing settlement in terms of footprint, massing and vertical scale. The perception that urban development extends through the site, effectively infilling the gap between the residential properties to the north and south, would not necessarily be detrimental to the character of the northern end of the village or to the experience of entering or leaving the settlement.

Settlement / wider landscape character:

- 6.3.5 As noted above in section 5, the visual profile of the site within the surrounding landscape is such that any potential adverse effects on the visual character of the village are considered to be negligible, providing the western boundary hedge is retained and protected. Signs of residential development such as roofs or upper storeys within the context of generous green space and retained existing mature trees in middle to long distance views from the west would not change the character of either the surrounding landscape or the settlement edge to any notable degree. In time, the establishment of any new structure planting on the site's western boundary would serve to strengthen the landscape character of the settlement boundary and its visual relationship with the wider agricultural landscape.
- 6.3.6 The development as proposed in the illustrative site plan would have no adverse effect on the landscape setting of valued local landmarks or on the Conservation Area within the village. No publicly available views of the prominent tower of the church of St. John the Baptist would be adversely affected.

6.4 Visual effects

Roads and footpaths:

- 6.4.1 In the context of an historic village with notable visual appeal such as Brinklow, visual receptors approaching the village on the Fosse Way or travelling along Lutterworth Road might be considered to be of moderate sensitivity to changes in the view from the road corridor. Such changes could have a notable impact on the visual character of the settlement – an aspect which is likely to be relevant to residents and visitors alike. If developed along the principles illustrated in Figure 4, the scale of change in the views

from the road resulting from the introduction of houses in a strong landscape setting within the site, would be small. With a sensitive approach to design and detailing, the visual texture and colours of the new buildings could be in keeping with those readily visible from the road immediately to the north and the south of the site, and the new development would not read as an intrusive element within the street scene.

6.4.2 In the limited views available across the open landscape from Smeaton Lane and the B4029, the level of proposed development on the site would generate a negligible change in both visual amenity and in the legibility of the village within its landscape setting.

6.4.3 For highly sensitive visual receptors using the PRoWs to the north along Smite Beck or to the west of the village, there would be no notable change in visual amenity for as a result of the introduction of houses on to the proposed development site. In time, the proposed structure planting would screen all new buildings, but in the period before such planting matures, any permanently or seasonably visible components of the development would not alter the current status quo between the visual profile of the village and the open countryside to the west.

Residential:

6.4.4 The most notable visual effects would be experienced by the small number of sensitive visual receptors in residential properties adjacent to the site, but even then, given the anticipated visual character of the proposed low density development, it is considered that the level of loss of visual amenity as a result of the changes in the view for these sensitive visual receptors, would be low. The new development is unlikely obstruct direct views of open countryside for these residents as these do not appear to be readily available.

Sites of heritage, cultural or community significance:

6.4.5 There would be no adverse effects on views from locations within the Conservation Area. From the top of the mound at the site of the Motte and Bailey castle, the site is hidden by dense vegetation and even in the event that the new development becomes visible in heavily filtered views when deciduous vegetation is not in leaf, it would be seen in the context of existing residential development to either side without any detriment to visual amenity or an appreciation of the landscape setting of this heritage asset.

6.5 There would be no notable change in the visual amenity experienced by potential visual receptors on the canal.

6.6 Policy compliance

6.5.1 In this section the proposed development is assessed against the landscape policies identified in section 3 and the statements on landscape sensitivity made in the referenced reports and Inspector's letters.

6.5.2 Rugby Borough Council Local Plan 2011-2031 (June 2019):

Policy.GP2: – the proposed development would be within the green belt and is therefore assessed in line with the designated functions of green belt set out in national policy, as follows:

- *To prevent unrestricted sprawl of large built-up areas:* the proposed development would be contained on its western edge by a well established and legible boundary defined by a dense hedge. This boundary reads as a logical alignment for the settlement edge, both on plan and in the field, and relates to the pattern of existing landuse. The opportunity to extend development further westward would not be seen as a natural viable option for the future.
- *To prevent neighbouring settlements merging:* in no way might the proposed development contribute to a perceived reduction in the open space between Brinklow and the small isolated group of properties on Smeaton Lane to the north west.
- *To safeguard the countryside from encroachment:* as noted above, the extent of the proposed development is contained on its western boundary by a clearly legible hedgeline, the alignment of which appears to represent a logical edge to the village. There would be no sense of loss of openness of the landscape as a result of the proposed development.
- *To preserve the setting and special character of historic towns / villages:* the assessment of the potential effects on landscape character and visual amenity resulting from the development has established that the scale and basic visual qualities of the proposal is such that there would be no adverse effect on the landscape setting of the village or any of its most valued landmarks.
- *To assist urban regeneration, recycling derelict land:* it is considered that this function of the green belt is not relevant in this instance.

To summarise, it is considered that there would be no conflict with this specific local planning policy in landscape terms as a result of the proposed development.

Policy NE1: - if existing green infrastructure on site is retained, protected and enhanced as much as possible by restoring the main internal hedge and creating new structure planting, it is anticipated that a net gain in biodiversity could be achieved.

Policy NE3: - the site layout illustrated in Figure 4 is assessed as being a positive response to the site's landscape context and the distinctive characteristics of the settlement pattern of the village. Existing landscape features of local value such as the hedges and trees within the site could be retained and, where appropriate, enhanced in terms of their physical condition. Although the visual effects of a sensitively planned development on the open rural landscape to the west would be small, the creation of a new belt of native species structure planting on the site's western boundary would make a positive contribution to local landscape character.

Policy SDC2: - the proposed low density of the development illustrated enables existing green infrastructure to be retained as much as possible and for significant levels of new native structure planting to be incorporated with the site layout.

Policy SDC3: - it is anticipated that there would be no adverse effects on the landscape character of the setting of any designated or non-designated heritage asset.

6.5.3 As noted in section 1 above, this assessment sets out to review specific matters relating to landscape and visual effects raised by the Local Planning Authority which are considered pertinent to this particular site. The key issues are set out in section 1.1.3 and are addressed below as follows:

i) **Rejection of the site in the 2016 SHLAA (reference the Brinklow Site Allocations Development Pack June 2016):** The two largest fields within the proposed development site are assessed for suitability for development within the above document under site ref. S16075. As noted in section 3.7.1 above, it is clear that the assessment of the suitability of the site in terms of its landscape character, has been made on the basis that it falls within a larger landscape parcel BK-07 as defined in the Landscape Sensitivity Study 2016. The characteristics of this larger unit are erroneously attributed to the proposed development site, however, if one considers the individual factors against which the site is judged, it is apparent that they are not directly relevant to the actual development site S16075. This can be illustrated by looking at the reasons why the site is considered inappropriate for development in the above document as follows:

- *its small scale pastoral qualities act as a transition between the settlement and the wider farmland:* the proposed development site is enclosed on three sides by urban

development / infrastructure and on the fourth (western) side by an intensively managed paddock. It is visually segregated from the wider agricultural landscape to the west by a well established hedgerow and as a consequence of the above, is not readily interpreted as a 'transition zone' in the field.

- *the site connects with the stream corridor of Smite Brook*: the actual proposed development site has no physical connection and has been seen to have a very weak visual connection with the Smite Brook corridor and its associated PRoW.

- *the majority of the zone lies within a Local Wildlife Site or potential Local Wildlife Site*: the actual proposed development site is not within or even directly adjacent to a LWS, although the smallest field is identified as having LWS potential, along with the neighbouring existing private gardens.

- *the roadside hedge with scattered trees, is a primary hedgeline in good condition and should be safeguarded*: this aspect is directly relevant to the specific development site in question, but it has been shown in Figure 4 that although a small section of hedge would need to be removed to form the site access off Lutterworth Road, the sensitive masterplanning of the site could ensure that the great majority of this hedge could be retained and protected and the planting reinforced with new hedgerow trees.

To summarise, it is considered that the reasons the site was identified as being unsuitable for development in landscape terms, are not well founded.

ii) Landscape related reasons the Local Plan Inspector gave for rejecting a neighbouring residential development site, namely:

- *The site is detached from the settlement edge*: as noted above, the proposed site is enclosed on three sides by development / infrastructure and it is considered that sits within a landscape pattern which relates well to the legibility of the visible settlement edge. The site the Inspector was referring to projected well beyond the visible limits of the existing village.

- *It would have a strong urbanising effect on an otherwise attractive rural landscape* – the assessment in sections 6.3 & 6.4 above suggests that the infilling of this open space between existing residential development immediately to the north and to the south of the site along Lutterworth Road would have no notable adverse effect on either the visual character of this part of the village or on the wider rural landscape to the west, and that the site's western boundary is a well established landscape feature

which reads as a logical limit to urban development along the west side of Lutterworth Road.

- *Visibility of the site from the Fosse Way on the approach to the village, from Lutterworth Road and from local PRow to the north of the village:* the assessment of visual effects in section 6.4 above has concluded that the visual profile of the proposed development site is limited from these key locations and that any reduction in either visual amenity or an appreciation of the landscape setting of the village or its visual character, would be negligible.

- *Urban encroachment into the countryside:* again, unlike the much larger site being assessed by the Inspector, the proposed development site now being considered does not extend into open countryside and is contained by a well established hedgeline in line with the existing settlement boundary to the north and south.

- *Potential harm to the historic relationship between the rural area and the village:* there would be no notable adverse effects on the landscape setting of the village or any of its landmark sites of heritage significance and it does not appear to be the case that the undeveloped nature of the site is a response to any notable landscape features or qualities.

- *Impact on the approach to the village and setting of the Conservation Area:* it has been assessed in section 6.4 above that the development of the site would have no effect on the visual character of the approach to the village along the Fosse Way or on the setting of the Conservation Area.

- *Urbanisation of views across the countryside from the castle:* it has been established that the visual profile of the proposed development would be negligible, even when deciduous trees are not in leaf, and that any potential heavily filtered seasonal glimpses of urban development would be seen in the context of existing built forms to the north and the south.

iii) **Consider potential impacts on the local street scene:** this issue has been addressed in sections 6.3.4 and 6.4.1 above.

iv) **Review potential loss of trees and hedgerow on site:** this issue has been addressed in sections 6.3.1 and 6.3.5 above.

v) **Consider issues of coalescence and ribbon development:** the issue of potential for coalescence has been addressed in section 6.5.2 above. In terms of potential

adverse effects in the form of ribbon development, it is considered that the cluster of residential plots to the north of the proposed site is readily interpreted in the field as part of the larger village footprint, and the infilling of the existing gap between the properties to the north and south of the site is entirely in keeping with the distinctive and characterful linear form of the village along Lutterworth Road.

vi) **Consider potential effects on views gained when approaching from the north:** this issue has been addressed in section 6.5.3ii) above.

vii) **Consider potential impacts on views of the site from within the wider area, particularly from the west:** this issue has been addressed in sections 6.4.1 – 6.4.3 above.

7.0 MITIGATION MEASURES

7.1 Introduction

7.1.1 Mitigation of potential significant adverse effects can be addressed through the processes of prevention or avoidance (the preferred option); through reduction, or through compensation (generally considered to be the least favourable option).

7.2 Landscape strategy

7.2.1 It is suggested that the implementation of a sensitive landscape strategy for the development site in question has the potential to successfully mitigate any potential small adverse landscape and visual effects to an acceptable level. A landscape strategy for the development site should set out to deliver the following objectives:

- Protect the existing boundary vegetation and internal field boundaries in accordance with BS5837:2012 *Trees in relation to design, demolition and construction; Recommendations*.
- Deliver a site entrance which minimises the loss of existing vegetation cover and which is in keeping with the visual character of the road corridor.
- Provide new hedgerow trees on the site's eastern boundary along Lutterworth Road.
- Provide native structure planting along the western site boundary to reinforce the screening function of existing hedgerow and enhance the site's biodiversity.
- Minimise any adverse visual effects for neighbouring properties overlooking the site through sensitive site masterplanning.
- Hard landscape material for surface finishes and boundary treatments should be appropriate for the local site context.

7.2.2 While the existing mature and semi-mature ash trees within the site make a positive contribution to the character of the site and the local landscape and should be retained, they should be assessed at appropriate intervals by a qualified arboriculturalist if they start to show signs of ash dieback (*Hymenoscyphus fraxineus*) and are in close proximity to new development. In any event, it would be advisable for a the landscape strategy of any development proposal to anticipate the loss of the majority of the ash trees on site over time and to allow for suitable replacement hedgerow trees.

8.0 CONCLUSION

- 8.1 This assessment finds that it should be possible to introduce residential development on the site as proposed without generating any notable adverse landscape or visual effects. The key issues are understood to be the extent to which development of this greenfield site could potentially have a negative impact on the character of the village by way of changes to: i) the visual character of the Lutterworth Road corridor; ii) the visual profile of the settlement edge when seen in longer distance views across the open agricultural landscape setting to the west; iii) the distinctive urban grain found within the settlement; iv) the view of the village on the approach from the north, and v) the setting of, and views out from, the Conservation Area.
- 8.2 In all the above aspects, it is considered that, assuming a sensitive approach is taken to the site masterplanning and detailed design, any notable adverse landscape or visual effects can be avoided. In particular, it is found that retention and protection of the existing trees and hedgerows on the site should be the keystone to the development's landscape mitigation strategy.
- 8.3 With regard to past assessments of the proposed development site's suitability for accommodating residential development without harming the landscape, it is perhaps surprising that to date, so much reliance has been placed in multiple documents on the assessment of the landscape character and sensitivity of a larger landscape unit within which the proposed site is located, rather than the actual site itself. Without having researched the assessment methodology that resulted in the larger landscape unit BK-07 being identified as a single entity, it is clear that the characteristics of the landscape of the proposed development site differ from those of the larger unit in important key areas, such as the intervisibility of the site and the surrounding rural landscape.
- 8.4 When assessed on its own merits, it is considered that the site is less sensitive to development than previous reports would suggest, and that development of the site is possible in a manner that does not result in notable adverse landscape or visual effects which cannot be adequately mitigated.
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FIGURES 1 – 6iv