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1.0 Introduction

- 1.1 Nicholas Pearson Associates was appointed in February 2021 by Kingswood School to undertake a Preliminary Landscape and Visual Appraisal (LVA) of the school's Upper Sports Fields (the Site) in respect to future development potential.
- 1.2 The Site, located in Lansdown, at the northern edge of Bath, is situated to the north of Lansdown Road.

 The Site is currently used by Kingswood School for sports, and contains a mixture of all-weather and grass pitches, and a sports pavilion. The school are seeking to reorganise the arrangement of sports facilities within the Site, such that part of the area may be released for residential development.
- 1.3 Bath & North East Somerset Council (B&NES) is currently partially updating its Local Plan, which covers the period up to 2029. The requirement for the local plan review, is in part driven by the need for B&NES to "ensure we can meet our Core Strategy requirements for housing up to 2029' and to "update particular policies, to address changes in circumstances... particularly the Council's declaration of a Climate Emergency and an Ecological Emergency". Kingswood School are therefore seeking to promote the Upper Sports Fields site, as part of this local plan review process.
- 1.4 This Preliminary LVA has been undertaken by a Chartered Member of the Landscape Institute (CMLI) and has been prepared with reference to Guidelines for Landscape and Visual Impact Assessment (3rd Edition)², being proportional to scale and nature of the proposed development. Site appraisal and provisional viewpoint photography was undertaken in February 2021. The LVA provides an outline of the landscape and visual baseline for the Site and surrounding context. The key landscape planning context and policies, landscape designations and published landscape character assessments are identified. The visual context of the Site is discussed.
- 1.5 A preliminary Landscape Planning and Design Strategy is presented, which sets out objectives to seek to avoid, minimise, and mitigate, potential adverse landscape and visual effects, in relation to the future development of the Site.
- 1.6 This report focuses on the landscape and visual issues associated with potential residential development within the identified part of the Site (referred to as the Housing Site). It is noted that in order to facilitate this development, the sports pavilion and parking will also need to be relocated,

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¹ B&NES (2021) 'Local Plan Partial Update Options Consultation' [online] Available at: https://beta.bathnes.gov.uk/local-plan-partial-update-options-consultation (Accessed 18.02.2021).

² Landscape Institute and IEMA (2013) 'Guidelines for Landscape and Visual Impact Assessment' (3rd Edition) London: Routledge.

alongside the reorganisation of the sports pitches. The proposed new locations for the new pavilion and parking area, maintain these facilities outside of land designated as Green Belt and outside the Cotswolds Area of Outstanding Natural Beauty (AONB).

1.7 A future landscape and visual impact assessment (LVIA) for the whole site, will consider this reorganisation of the sports facilities, alongside consideration of proposed residential development, within the scope of the more detailed study. However, it is noted at this preliminary stage that a sensitive approach would be required, in the design of the sports facilities, in order to minimise adverse landscape and visual impacts.

2.0 Landscape Planning Context

National Planning Policy Framework

- 2.1 The National Planning Policy Framework (NPPF)³ sets out the Government's planning policies for England and how these are expected to be applied. It includes requirements for good design (*Section 12. Achieving well-designed places*) and the protection of the natural and historic environments (*Section 15. Conserving and enhancing the natural environment* and *Section 16. Conserving and enhancing the historic environment*).
- 2.2 In relation to conserving and enhancing the natural environment it is stated that (paragraph 170):

 "Planning policies and decisions should contribute to and enhance the natural and local environment by:
 - protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
 - recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services".

Local Planning Policy

2.3 The Local Plan 2011-2029 for B&NES comprises the Core Strategy (adopted July 2014) and the Placemaking Plan (adopted July 2017)⁴. Policies of relevance to landscape and visual issues, include:

³ Ministry of Housing, Communities and Local Government (2019) 'National Planning Policy Framework'. London: Ministry of Housing, Communities and Local Government.

⁴ Bath & North East Somerset Council (2020) 'Core Strategy and Placemaking Plan' [online] Available at: https://beta.bathnes.gov.uk/policy-and-documents-library/core-strategy-and-placemaking-plan (Accessed 19.02.2021)

2.4 Policy B4: The World Heritage Site and its Setting, states:

"There is a strong presumption against development that would result in harm to the Outstanding Universal Value of the World Heritage Site, its authenticity or integrity. This presumption applies equally to development within the setting of the World Heritage Site."

2.5 Policy GB1: Visual Amenities of the Green Belt, states:

"Development within or conspicuous from the Green Belt should not prejudice but seek to enhance the visual amenities of the Green Belt by reason of its siting, design or materials used for its construction."

- 2.6 Policy NE2: Conserving and Enhancing the Landscape and Landscape Character, sets out requirements for new development to conserve or enhance local landscape character, conserve or enhance important views and to "seek to avoid or adequately mitigate any adverse impact on landscape".
- 2.7 Policy NE6: Trees and Woodland Conservation, sets out the requirements for trees in relation to development, stating:

"Development will only be permitted where: (a) it seeks to avoid any adverse impact on trees and woodlands of wildlife, landscape, historic, amenity, productive or cultural value..."

Statutory and Non-Statutory Designations

2.8 Landscape and heritage designations relevant to the Site and surrounding context are shown on **Figure 01**.

City of Bath World Heritage Site

- 2.9 The majority of the Site, including all of the proposed Housing Site falls within the City of Bath World Heritage Site (WHS). The northern edge of the Site is identified within the setting of the WHS. Whilst this is a heritage designation, there are landscape and visual related aspects of the designation.
- 2.10 The City of Bath World Heritage Site Management Plan 2016-2022⁵ sets out the attributes of Outstanding Universal Value (OUV) of the WHS. One of the six headline attributes is the 'Green Setting of the City in a Hollow in the Hills'. This attribute is detailed further (p. 20) and relevant elements include:

⁵ Bath & North East Somerset Council (2016) 'City of Bath World Heritage Site Management Plan 2016-2022' [online] Available at: https://www.bathworldheritage.org.uk/sites/world_heritage_site/files/heritage/World%20Heritage%20Site%20Management%20Plan%20 <a href="https://www.bathworldheritage.org.uk/sites/world_heritage_site/files/heritage/World%20Heritage%20Site%20Management%20Plan%20 <a href="https://www.bathworldheritage.org.uk/sites/world_heritage_site/files/heritage/World%20Heritage%20Site%20Management%20Plan%20 <a href="https://www.bathworldheritage.org.uk/sites/world_heritage_site/files/heritage/World%20Heritage%20Site%20Management%20Plan%20 <a href="https://www.bathworldheritage.org.uk/sites/world_heritage_site/files/heritage/World%20Heritage%20Site%20Management%20Plan%20 <a href="https://www.bathworldheritage.org.uk/sites/world_herita

- "The compact and sustainable form of the city contained within a hollow of the hills"
- "Green, undeveloped hillsides within and surrounding the city"
- "Trees, tree belts and woodlands predominantly on the skyline, lining the river and canal, and within parkland and gardens"
- "Open agricultural landscape around the city edges, in particular grazing and land uses which reflect those carried out in the Georgian period"
- 2.11 The City of Bath World Heritage Site Setting Supplementary Planning Document⁶ sets out the key aspects of the City of Bath Word Heritage Site Setting, which convey the OUV of the WHS. These primarily relate to 1. character, 2. views and 3. historical associations. The first two are detailed as:
 - "The distinctive character provided by the topography, the townscape and land-use including the green undeveloped farmland, green spaces, and trees and woodland, landscape features and the qualities such as tranquility which characterise the surroundings of the Site."
 - "The views afforded within the setting, from the city to the green hillsides shown in map 5, woodland, farmland and open spaces and conversely the opportunities provided by the surroundings to view the city in the context of the setting. Typically views into the city are few which reflects the compact form of the city which appears to be contained within a hollow and is surrounded by hills."
- 2.12 It is also noted that a further aspect of the WHS setting is the:
 - "Routes into and out of the city and the quality and character of their environs and views to and from them."
- 2.13 The WHS SPD contains a map identifying 'Landform Features Associated with the Character of the World Heritage Site' (Map 3, p.34). The Site falls within an area identified as plateau area '8 Lansdown High Cotswold Plateau and outer slopes'.
- 2.14 The WHS SPD also identifies a number of views from within the WHS and the setting of the WHS (Map 7, p.76), these are discussed within **Section 4.0 Visual Context**.

⁶ Bath & North East Somerset Council (August 2013) 'City of Bath World Heritage Site Setting Supplementary Planning Document' [online] Available at: https://www.bathnes.gov.uk/services/environment/landscape/city-bath-world-heritage-site-setting (Accessed 03.03.2021)

Cotswolds Area of Outstanding Natural Beauty (AONB)

- 2.15 The northern and western parts of the Site fall within the Cotswolds Area of Outstanding Natural Beauty (AONB). The proposed Housing Site is located outside of the Cotswolds AONB.
- 2.16 The Cotswolds AONB Management Plan 2018-2023⁷ sets out the special qualities of the AONB, these include:
 - "the unifying character of the limestone geology its visible presence in the landscape and use as a building material;"
 - "the Cotswold escarpment, including views from and to the AONB";
 - "distinctive dry stone walls";
 - "an accessible landscape for quiet recreation for both rural and urban users, with numerous walking and riding routes, including the Cotswolds Way National Trail;"
- 2.17 The Management Plan also sets out policies for the AONB. **Policy CE1: Landscape**, states:
 - "1. Proposals that are likely to impact on, or create change in, the landscape of the Cotswolds AONB, should have regard to, be compatible with and reinforce the landscape character of the location, as described by the Cotswolds Conservation Board's Landscape Character Assessment and Landscape Strategy and Guidelines.
 - 2. Proposals that are likely to impact on, or create change in, the landscape of the Cotswolds AONB, should have regard to the scenic quality of the location and its setting and ensure that views including those into and out of the AONB and visual amenity are conserved and enhanced."

Other landscape and heritage designations

- 2.18 **Green Belt** The Bristol / Bath Green Belt covers northern and western parts of the Site. The proposed Housing Site is located outside of the Green Belt.
- 2.19 **Registered Parks and Gardens** Lansdown Cemetery and Beckford's Tower (Grade II) Registered Park and Garden is located to the south of the Site, extending south-east along the southern side of Lansdown Road, from opposite part of the proposed Housing Site.

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⁷ Cotswolds Conservation Board (2018) 'Cotswolds Area of Outstanding Natural Beauty Management Plan 2018-2023' [online] Available at: https://www.cotswoldsaonb.org.uk/planning/cotswolds-aonb-management-plan/ (Accessed 03.03.2021)

- 2.20 **Conservation areas** The Site is situated outside of the Bath Conservation Area. The conservation area boundary follows Lansdown Road, adjacent to the south-western boundary of the Site.
- 2.21 **Scheduled Monuments** 'Two round barrows N of Blathwayt Arms' is the nearest Scheduled Monument to the Site, located approximately 1.3 km to the north-west.
- 2.22 **Listed Buildings** There are no Listed Buildings within the Site. The nearest Listed Buildings and structures are those associated with Lansdown Cemetery, opposite the Site, including 'Beckford's Tower with Attached Wall and Railings' (Grade I) and 'Lansdown Cemetery, Entrance Gates, Piers and Walls' (Grade II*).
- 2.23 **Tree preservation orders (TPO)** The tree belt along the eastern edge of the Site falls within an Area TPO (ref. 500/294), which protects all trees located within and immediately adjacent to the former MOD Ensleigh site, (see purple hatch on **Plate 1**).



Plate 1: Tree Preservation Orders

Source: https://beta.bathnes.gov.uk/policy-and-documents-library/core-strategy-and-placemaking-plan (Accessed 19.02.2021)

Public Rights of Way

2.24 A public footpath (BA5/13) runs north-east from Lansdown Road through the Site, turning at the centre of the Site, to follow a field boundary east. There are no public rights of way through the proposed Housing Site.

3.0 Landscape Context

Overview

3.1 Published Landscape Character Assessment (LCA) studies help to establish the landscape baseline. Such LCAs may be of varied scales ranging from broad-scale national character area studies to detailed local authority assessments. 'Guidelines for Landscape and Visual Impact Assessment' recognises that LCAs "adopted and published by competent authorities are usually the most robust and considered documents" (GLVIA3; p.77).

National Character Areas

3.2 National Character Areas (NCA) are published by Natural England and provide an assessment of landscape character at a national scale. The Site and its context fall within NCA 107 – Cotswolds⁹.

Local Landscape Character Assessments

Cotswolds AONB Landscape Character Assessment

- 3.3 The Cotswolds AONB Landscape Character Assessment ¹⁰ provides an assessment of landscape character for the whole of the AONB. The northern and western parts of the Site fall within an area identified as 'High Wold Dip-Slope' landscape type and at the south-eastern edge of landscape character area 9C: Lansdown, **Figure 02**.
- 3.4 Key characteristics of the High Wold Dip-Slope landscape type include:
 - "Soft, gently undulating rolling landscape dissected by a series of predominantly south-east flowing rivers;
 - transitional landscape displaying many of the characteristics of the neighbouring High Wold and Dip-Slope Lowland landscape character types...
 - large scale open arable fields with little tree cover, as well as a more complex mosaic of smaller scale arable and pasture contained within a strong framework of hedges and woodland;
 - stone walls less prevalent than on the High Wold, but notable adjacent to roads and in vicinity of settlements...

http://publications.naturalengland.org.uk/publication/5900626?category=587130 (Accessed 18.02.2021)

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⁸ Landscape Institute and IEMA (2013) 'Guidelines for Landscape and Visual Impact Assessment' (3rd Edition) London: Routledge.

⁹ Natural England (2015) '*National Character Area Profile: 107. Cots*wolds' NE420 [online] Available at:

¹⁰ LDA (2003) 'Cotswolds AONB Landscape Character Assessment' [online] Available at: https://www.cotswoldsaonb.org.uk/ourlandscape/landscape-character-assessment/ (Accessed 18.02.2021)

- grain of landscape patterns often aligned along the course of Roman roads that cross the area;"
- 3.5 The description of Landscape Character Area 9C: Lansdown includes the following text, which describes the 'suburban' context of the site (noting that the Government offices have now been replaced by the Ensleigh residential development to the east of the Site):

"Lansdown Road, a minor but very busy road, passes along the centre of the plateau linking the small village of Lansdown to Bath in the south. Numerous developments are located alongside this road, including a large complex of Government offices, car parks and sports pitches in the south, and a golf course and Lansdown Racecourse in the west. These features exert a strong suburbanising influence on the landscape."

3.6 The proposed Housing Site, being situated outside of the AONB, does not fall within the direct study area of the landscape character assessment.

Rural Landscapes of Bath and North East Somerset: A Landscape Character Assessment

- 3.7 This Supplementary Planning Document¹¹ provides a landscape character assessment for the rural areas of Bath and North East Somerset. The Site is located within Character Area 16: Cotswolds Plateaux and Valleys, **Figure 03**. Relevant elements of the landscape character summary are:
 - "Open high Oolitic Limestone plateaux enclosed by dry stone walls and few trees"
 - "Arable and pastoral farmland on plateaux"
 - "Pasture and woodland on valley sides"
 - "Larger fields on plateaux and smaller more irregular fields on valley sides"
 - "Warm coloured Oolitic Limestone buildings and walls"
 - "Straight roads on the plateaux"
 - "Open landscape on plateaux and more enclosed and intimate landscape within valleys"

¹¹ B&NES (2003) 'Rural Landscapes of Bath and North East Somerset: A Landscape Character Assessment' [online] Available at: https://beta.bathnes.gov.uk/policy-and-documents-library/rural-landscapes-character-assessment (Accessed 04.03.2021)

Bath City-wide Character Appraisal

- 3.8 The Site itself sits outside of the city character areas identified by the Bath City-wide Character Appraisal. However, Area 2 Weston Park, Sion Hill and Upper Lansdown covers land within the southeast context of the Site, **Figure 02**.
- 3.9 The Site is situated within the North of Bath Rural Fringe area, **Figure 02**. Relevant extracts from the area description are provided below:
 - "The land is mostly in agricultural use. However, the flat nature of the plateau lends itself to use as sports pitches and the racecourse. Other uses include the Lansdown Park and Ride, Beckford's Tower with Lansdown Cemetery and a water tower and telecommunications masts."
 - "The area is quite tranquil in many parts and skylarks can be heard. There are some exceptions.

 The fast moving traffic on Lansdown Road detracts greatly..."
 - "The flat landform of the plateau has been used for many sports pitches. The management of sports pitches includes the use of fertiliser, weed killer and close mowing, and this regime destroys the integrity of the calcareous grassland. The calcareous grassland character is maintained around the pitches which benefits wildlife from bumblebees to skylarks."
 - "The well managed landscape of the scarp slope of this area makes an impressive rural backdrop to development on the north side of Bath. The hills and rural ridge line are prominent in many views from within the river valley, urban and rural viewpoints, and from the opposite valley sides to the south."

Character of the Site

3.10 The Site is situated on level ground on the southern part of the Lansdown plateau, in an elevated position at approximately 230m AOD. Lansdown Road forms a strong linear feature across the plateau, and runs adjacent to the south-western boundary of the Site. Lansdown Cemetery and Beckford's Tower form the immediate context to the south-west of the Site, before the land drops steeply down to the south, forming an element of green hillside to the City of Bath. The recent Ensleigh housing development is adjacent to the east, at a similar elevation to the Site upon the plateau. Other sports facilities, Lansdown Park and Ride and agricultural land provide the context to the west, with agricultural land and woodland to the north.

- 3.11 The Site currently provides sports facilities for Kingswood School. More developed elements of the Site are situated along the southern edge, adjacent to Lansdown Road; comprising surfaced, fenced tennis courts within the south-east corner, adjacent to a sports pavilion and car park, and to the west a floodlit, fenced astro hockey pitch. The central and northern parts of the Site contain un-lit grass pitches, and an un-lit grass athletics track is located within the west of the Site.
- 3.12 An established beech hedgerow and a belt of mature, deciduous trees are present along southern parts of the eastern boundary. Houses within the Ensleigh development are partially visible beyond this tree line. Mature trees (both deciduous and coniferous) are also present along the boundary with Lansdown Road. Hence southern and eastern parts of the Site have a degree of enclosure.
- 3.13 A belt of coniferous trees wraps around the southern edge of the athletics track, and a coniferous hedge is present around the northern edge. A dry stone wall runs east west across the Site.
- 3.14 The northern part of the Site has less tree cover, and is more open, with views across the edge of the plateau to the valleys and countryside to the north.

4.0 Visual Context

- 4.1 The visual context of the Site is defined by combination of the topography of the plateau, the elevation of the Site in relation to the surrounding area, and the effects of intervening built form and vegetation. The availability of views to visual receptors is also influenced by the distribution of settlements, roads and public rights of way within the area surrounding the Site.
- 4.2 Viewpoint photographs from a selection of representative local views are included within **Figures 05-13**, and the locations from which these are taken illustrated on **Figure 04**. These include views from:
 - Lansdown Road (VP1 and VP3) where the proposed Housing Site is seen through the southern boundary of deciduous trees. The existing pavilion, car park, surfaced courts and fencing are seen;
 - Lansdown Cemetery (VP2 and VP3) where there are views of the south-east corner of the
 Site filtered by intervening trees from within the cemetery (VP2), and views into the Housing
 Site from the cemetery gateway (VP3). Elevated views will also be available from Beckford's
 Tower;
 - The public right of way through the Site (VP4) where there are open views across the sports field to the Housing Site. The existing pavilion and floodlit, fenced all weather hockey

pitch are seen in front of the mature trees along the southern boundary. Beckford's Tower is seen beyond tree belt to the south and houses within the Ensleigh development are seen adjacent to the south-east of the Site;

- The public right of way north and north-east of the Site (VP5 and VP6) where the Site
 is seen as part of sequential views, to varying extents and variously filtered by intervening
 vegetation; and
- The Cotswold Way, near Sir Bevil Grenville's Monument (VP7) where the north-eastern part of the Housing Site is partially seen, in front of the Ensleigh development. The south-western part of the Housing Site is filtered by intervening vegetation.
- 4.3 There is also potential for the Site to be seen in longer distance views. The WHS SPD identifies a number of key views from within the WHS and its setting (Map 7, p.76)¹². Those with potential relevance for the Site include:
 - 1 Prospect Stile;
 - 10 Little Solsbury Hill;
 - 13 Twerton Roundhill; and
 - 16 Widcombe Hill.
- 4.4 In such distant views, the site is likely to be a minor element in what are panoramic views and also likely to be variously concealed by intervening built form and/ or vegetation, A future landscape and visual impact assessment (LVIA) for the whole site, will consider longer distance views in more detail.

5.0 Emerging Development Proposals

- 5.1 The location of the Housing Site, positions the area of proposed development within the more enclosed southern-eastern part of the wider Site, and away from the more open northern and western parts of the Site.
- 5.2 The current emerging proposals include for a development strategy which is sensitive to the landscape context this includes;
 - A Site layout which retains key vegetation;

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¹² Bath & North East Somerset Council (August 2013) 'City of Bath World Heritage Site Setting Supplementary Planning Document' [online] Available at: https://www.bathnes.gov.uk/services/environment/landscape/city-bath-world-heritage-site-setting (Accessed 03.03.2021)

- Building densities and building heights which are responsive to context, with greater densities
 within the centre of the Site, transitioning to more dispersed patterns at the boundaries;
- Green spaces which connect to existing areas of green infrastructure; and
- Proposed housing forming a positive frontage along Lansdown Road.

6.0 Potential Landscape and Visual Effects

- 6.1 It is recognised that there are high values associated with the landscape context of the site, in particular due to its location within the WHS, and proximity to the Cotswolds AONB, as well as the presence of various heritage assets. However, as noted within the Cotswolds AONB and Bath landscape character assessments, the sensitivity of the landscape character of the immediate site context is moderated in part, by traffic along Lansdown Road and the suburban land uses of this southern part of the plateau.
- 6.2 The location of the Housing Site is proposed within the southern corner of the Site, which is a more enclosed, and more closely associated with the existing Ensleigh housing development to the east and Lansdown Road to the south.
- 6.3 It is however noted that development of the Housing Site has potential to cause both direct and indirect effects upon landscape and visual receptors. Potential landscape effects would primarily relate to the change in character of the Site, associated with the change from sports facilities (including pavilion and car park) to housing. The level of such effects will be influenced by the site layout, and proposed height, scale and massing of the proposals.
- Oisual effects are likely to result from changes to the views afforded to visual receptors, due to development within the Housing Site being seen as additional elements within views. The scale of change will depend on the arrangement and height of built form and will very according to the location and sensitivity of the visual receptors. There will likely be increased levels of change in local views, whereas in longer distance views, development within the Site may be seen as part of wider panoramic views. In many local views the proposed development would be seen in the context of the existing adjacent Ensleigh housing development.
- 6.5 Through an appropriate landscape planning and design strategy (section 7 below), opportunities to avoid, minimise and mitigate effects to landscape and visual receptors can be considered.

7.0 Landscape Planning and Design Strategy

7.1 As noted above there is potential for landscape and visual effects in relation to the future housing development within the Site. The following Landscape Planning and Design Strategy sets out recommendations to inform the evolution of a scheme which seeks to avoid, minimise and mitigate landscape and visual effects. Particular consideration should be given to moderating potential detrimental effects on the landscape, in relation to the City of Bath World Heritage Site and its setting, and the Cotswold AONB.

Landscape Planning and Design Strategy

- Undertake further landscape character and visual analysis of the Site, through desk study, field survey and appraisal. This will improve understanding of receptor sensitivities and potential effects on the local and surrounding area and from longer distance viewpoints. This would also inform design and landscape management considerations;
- 2) Undertake a full Landscape and Visual Impact Assessment (LVIA) according to current guidance (Guidelines for Landscape and Visual Impact Assessment)¹³;
- 3) Informed by the above steps, develop a landscape strategy as an integral part of the masterplanning process for the Site. This should provide sufficient and meaningful green infrastructure across the Site, which seeks to retain and enhance existing landscape features and connects to the wider green infrastructure network of the surrounding area;
- 4) Undertake tree and vegetation surveys to identify existing features, to develop protection, retention, mitigation and enhancement strategies, and inform detailed design; and
- 5) Develop sustainable drainage systems, as required, at an early stage in order to maximise opportunities for amenity and biodiversity enhancements, in addition to water quantity and quality management.
- 6) The overall masterplan to evidence a sensitive response to the landscape and visual context and receptors. Such a sensitive response to include consideration of site layout, building locations, building heights, material types and colours, and lighting.
- 7.2 Overall, on the basis that the development is brought forward with sensitivity to its context, and the above strategy is progressed, the scheme is likely to demonstrate a high level of mitigation, which minimises adverse landscape and visual impacts.

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¹³ Landscape Institute and IEMA (2013) 'Guidelines for Landscape and Visual Impact Assessment' (3rd Edition) London: Routledge.

