Question 73 - "Are the housing allocations in GA3 ... justified and deliverable and are they consistent with the Plan's spatial principles (Strategic Policy S1) and national policy ...?"

(a) Is the scale of housing for ... the large Strategic Growth Site North of South Woodham Ferrers justified having regard to any constraints, existing local infrastructure and the provision of any necessary additional infrastructure?

The Inspector will be aware from the Statement of Common Ground (SOCG) signed between the Council and the three Site Promoters (not yet assigned an SOCG reference at the time of writing) that the parties have agreed to work collaboratively on a site-wide Masterplan. In common with other Strategic Growth Sites, the Masterplan process comprises four stages, with the first stage (Stage 0) comprising technical analysis of the site, including site constraints.

Appendix 6 of that SOCG shows some initial output from the joint work being undertaken by the site promoters as part of the Stage 0 Masterplan process. The plans at Appendix 6 of the SOCG show the initial site context analysis, and also the mapping of utility, environmental, and physical constraints that lie within the site allocation boundary.

From this analysis, the site promoters are able to calculate that, within the red line of the site allocation boundary, there is in the order of 60ha of developable land that is free of constraints and potentially suitable for residential development. Only 30-35ha of residential land would be required to deliver 1000 residential units at densities of 30-35 dwellings per hectare, so there is sufficient suitable land within the allocation boundary to meet the new homes requirement of the Policy.

The proposed development will also include land for open space, for surface water attenuation, and for some non-residential development, and these land uses are not all subject to the same constraints as residential development. The area of land suitable and available for meeting the wider land-use requirements of the new development will therefore be in excess of the 60 ha referred to above.

There is therefore sufficient suitable land to both deliver 1000 residential units and deliver the other land uses required by the Policy.

The actual selection of development parcels would of course need to be considered through the Masterplanning process, and not all of the land that is *potentially* suitable for residential development may be used for residential development. The Masterplanning process will also need to consider the distribution of non-residential uses and green infrastructure within the overall allocation area. It is important that the site allocation boundary is not drawn so tightly as to constrain design and layout matters that should properly be considered through the Masterplanning process.

With regard to education infrastructure, the scale of the development is large enough to enable provision to be made on-site, where required. Requirements for additional education facilities (primary and pre-school) are covered by the Policy, and are evidenced by the Infrastructure Delivery Plan (EB018B). No objection has been raised by the site promoters to their provision. The IDP (EB018B - Table 8.1/page 83) identifies sufficient capacity at the William de Ferrers School to accommodate the projected secondary school/post 16 pupil product from the development.

With regard to health facilities, the current planning permission for the new Sainsbury's store within the site (Planning Application reference 14/00830/FUL) includes for the construction of a new health facility, but if for any reason that proposal did not go ahead, an alternative on-site facility can be provided (as per the findings of the IDP EB018B at para 9.33 and Table 9.1) as part of the new neighbourhood centre.

In terms of utility infrastructure, foul drainage capacity is examined in the Water Cycle Study (EB107B) which confirms at Table 16 (page 18) that there is sufficient headroom to accommodate the development.

Investigations by Countryside Properties in respect of utility connections support the conclusions set out at Table 5.1 of the IDP (EB018B) i.e. that foul drainage will require some localised network reinforcement, which is a normal requirement for any major scheme, and that there are no significant issues with supply of water, gas or electricity.

The capacity of highway infrastructure and the need or otherwise for transportation improvements is covered in the separate Highways and Transportation SOCG entered in to between the Site Promoters, CCC, and the Highway Authority (again, the SWF Highways and Transportation SOCG has not been assigned a reference at the time of writing).

(b) Is the housing trajectory realistic?

Countryside Properties consider that commencement of residential development by 2021 is achievable. Along with the other Site Promoters for Strategic Growth Site 7, Countryside has signed up to a Masterplan PPA (which is included within the SOCG), with an expectation that the Masterplan would be completed by mid- 2019, and Countryside Properties intends to submit a part detailed/part Outline application shortly after the conclusion of that process, to facilitate an infrastructure start on site in 2020.

An average build rate of 100+ residential units per annum (with 2-3 sales outlets) over around 10 years is readily achievable in this location and is not unusually high, and therefore even if the development were to commence later than Countryside currently intend, delivering 1000 units within the Plan period will be achievable.

(c) Are the planning and masterplanning principles justified?

With the exception of the limited matters raised in Countryside's original representations (which are summarised in Appendix 5 of the SOCG, and which would be partially addressed by the proposed Main Modifications SD002), Countryside Properties consider that the planning and Masterplanning principles set out in the Policy are justified having regard to the overall objectives of creating a welldesigned and sustainable urban extension to South Woodham Ferrers.

(d) Are the specific development and site infrastructure requirements clearly identified ... are they necessary and are they justified ... Is there other infrastructure necessary for site delivery?

With the exception of the limited matters raised in Countryside's original representations (which are summarised in Appendix 5 of the SOCG, and which would be partially addressed by the proposed

Main Modifications SD002), Countryside Properties consider that the infrastructure required in connection with the development is properly identified in the Policy.

(e) Are the site boundaries justified?

Following the publication of the Preferred Options Draft, Countryside Properties commissioned its Masterplanners (Broadway Malayan) and Landscape Architects (David Jarvis Associates) to examine the boundary of the draft allocation as it was drawn at that time, and to undertake a detailed site assessment to help inform the definition of the site allocation boundary in advance of the publication of the Pre-Submission Draft.

The analysis included:

- A detailed assessment of topography and land form;
- The potential visual impact of development at 'test points' within the site to consider the extent to which development would be visible from the surrounding countryside;
- Analysis of current and previous patterns of field enclosures to consider the extent to which these formed existing or potential logical boundaries; and
- A 'finer grain' analysis of the broad land parcels assessed in the 2017 Landscape Sensitivity and Capacity Assessment (EB100A), with a view to identifying the locations within those broad zones that had the greater capacity to accommodate development and the least sensitivity.

A copy of the report is appended to this Statement (Appendix 1). The analysis suggested two potential site allocation boundaries, that sought to use either distinct topographic or existing/historic landscape features to form the site boundary wherever possible, and which took account of the findings of EB100A in terms of limiting development to the least sensitive parcels of land.

The analysis was tabled with CCC in November 2017, and it will be seen that the eventual site allocation boundary in the Submission version of the Plan closely follows the boundary suggested on page 17 of the report (with the principal exception of the alignment at the far western side of the site allocation towards Willow Grove).

Countryside Properties therefore consider that the site boundary is properly justified on the basis of detailed on-site assessment work that it commissioned specifically to assist the process of setting the site boundary, and has no objection to the slight deviations incorporated by CCC in the Submitted Plan, accepting that there is inevitably an element of professional judgement to be exercised by the Council when setting allocation boundaries.

(f) Will the site allocations in these locations achieve sustainable development?

We consider that Strategic Growth Site 7 accords with the spatial principles set out in Policy S1, and accordingly, will deliver sustainable development.

The scale of development required for the area means that not all development can be accommodated on previously developed land or be within the Chelmsford central area (the first two

Matter of Statement (Question

principles in S1). Inevitably, the development strategy therefore needs to include greenfield development sites outside existing urban areas.

Where development occurs outside the existing urban areas, the spatial principles require new development to avoid the Green Belt, and to respect the pattern and hierarchy of settlements. The Green Belt does not extend as far east as South Woodham Ferrers, and in terms of hierarchy, South Woodham Ferrers is the second largest settlement in the Chelmsford area, and (as set out in Policy S9), lies in the 'top tier' of the settlement hierarchy. The town offers a broad range of employment opportunities, services and facilities, alongside choices in travel mode. The expansion of South Woodham Ferrers accords both with the settlement hierarchy and the principle of locating development at well-connected sustainable locations.

In terms of flood risk, South Woodham Ferrers as a whole is heavily constrained by land at risk of flooding to the west, south and east (as shown on Policies Map 3). It is only the land to the north that is not materially constrained by flood risk. Surface water run off can be attenuated within the allocation site boundary to ensure no increased risk of off-site flooding.

In terms of the other environmental matters raised in Policy S1 (landscape, heritage and biodiversity), we would briefly note the following:

- (i) As per our answer to question (e) above, the site boundary has been carefully analysed and has been drawn to exclude areas of relatively higher landscape sensitivity. The allocation boundary does not, for example, include Bushey Hill, or the rising land towards Edwin's Hall Road to the north of the site;
- (ii) The allocation site contains no designated heritage assets Historic England raise no objection to the allocation in their response (Ref PS1787) subject to the policy containing appropriate requirements for the setting of nearby listed buildings to be protected (which is agreed by the promoters as per section 11 of the SOCG);
- (iii) The allocation adjoins (and partially includes) the Bushey Hill local wildlife site but the constraints mapping included at Appendix 6 of the SOCG recognises this and excludes built development in that vicinity. The estuarine areas are of international importance for conservation and the Inspector will be aware from SOCG02/SOCG02B that Natural England will shortly be bringing forward a Recreational Disturbance and Mitigation Strategy (RAMS) to manage the coastal areas of Essex and protect sites from disturbance. Natural England raises no objection to Strategic Growth Site 7 (PS2081) subject to the policy including appropriate safeguards to ensure a proportionate contribution to the RAMS. The promoters have already met with Natural England to commence discussion on the development of a strategy for on-site recreation to further help reduce off-site impacts over and above RAMS.

The Policy identifies the necessary infrastructure required for delivery, and there is no known impediment to the delivery of either the on-site infrastructure listed in the Policy, or the off-site transportation infrastructure referenced in the Policy and explored further in the SWF Highways and Transportation SOCG.

Matter 6C Statement (Question 73)

In terms of deliverability, as noted in our answer to question (a), there is sufficient land within the site allocation boundary to deliver the requirements of the Policy, with some flexibility to allow the Masterplanning process to properly consider the layout and disposition of land uses. Delivery is not dependent on relocation or removal of substantive on-site utilities in order to create room for the development. Taking in to account the updated IDP from June 2018 (EB018B), the Council's June 2018 Viability Note (EB082B) concludes that the site is "well above the Viability Threshold".

For all of the above reasons, we consider that Strategic Growth Site 7 accords with the spatial principles set out in Policy S1, and in turn, will constitute sustainable development in the context of the Chelmsford administrative area and its growth requirements.

On a specific matter, we are aware that a number of respondents to the Plan have raised concerns regarding the potential separating effect of the B1012 Burnham Road. Strategic Policy S11 (as proposed to be modified by AC41 from SD002) and the Strategic Growth Site 7 Policy (as proposed to be modified through AC186) require "multi-user crossings" of the B1012 and effectively provide that a range of options, including bridges or underpasses in addition to surface crossings, can be explored, which leaves flexibility for the most effective form and location of crossing points to be examined as the design for the scheme progresses¹.

The existing planning permission for a new Sainsbury's store within the allocation site already includes for one surface level crossing which will enable safe pedestrian and cycle crossing facilities between the site and the town via Hullbridge Road, and further crossing points can be provided, as explained at paragraphs 1.12 - 1.14 of SWF Highways and Transportation SOCG and shown on Plan 1 attached to that document. The SWF Highways and Transportation SOCG also explains at paragraph 1.11 that the potential exists to consider a reduced speed limit on Burnham Road.

Overall, as set out in the SWF Highways and Transportation SOCG at para 1.15, the Highway Authority is satisfied that safe and convenient crossing facilities to Burnham Road can be provided, without adversely affecting the function of the road.

(g) Are any amendments necessary to ensure soundness?

Countryside's original representations identified a number of minor policy wording changes to the Strategic Growth Site 7 Policy which it considered necessary to achieve soundness.

The schedule attached to the SOCG, at Appendix 5, summaries Countryside's representations on soundness, and identifies which of these representations would be met by the proposed Main Modifications at SD002 and which remain as extant (but surmountable) objections to the policy wording.

Appendices

Appendix 1 – South Woodham Ferrers Northern Boundary Study, September 2017.

¹ On a minor related point, we note that whilst changes AC41 and AC186 make clear that there is flexibility for crossing design, Policies Map 3 for South Woodham Ferrers is still specific as to a bridge location, and should be updated to reflect changes AC41 and AC186.

SOUTH WOODHAM FERRERS

ESSEX

NORTHERN BOUNDARY STUDY
SEPTEMBER 2017

PRIVATE AND CONFIDENTIAL



BroadwayMalyan[™]



PURPOSE OF THE DOCUMENT



STRUCTURE

- Further technical studies have been undertaken to understand and set out a robust northern boundary that considers:
 - topography;
 - visual impact;
 - field patterns and woodland;
 - open space; and
 - landscape sensitivity Chelmsford City
 Council's Landscape Sensitivity and Capacity
 Assessment (LSCA) appraisal







View One: View from the top of the knowle, east of the B1418, looking east towards Edwinshall Wood/Radar Hill.

View Two: View looking across land to the east of Willow Grove.

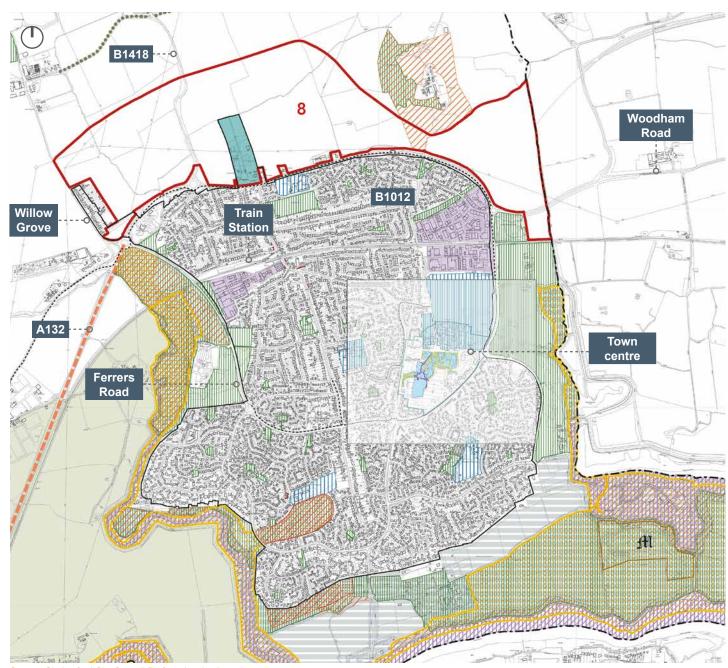
View Three: View looking east along Edwin's Hall Road, and identifying land gently sloping up to the south.

CCC'S DRAFT LOCAL PLAN ALLOCATION



STRATEGIC GROWTH SITE 8 - NORTH OF SOUTH WOODHAM FERRERS

 Draft Local Plan (DLP) preferred option northern site allocation boundary is currently not defined by any physical / natural attribute or topographical justification.



Chelmsford Draft Local Plan



TOPOGRAPHY



EXISTING FEATURES

- Topography slopes downwards in a north
 south direction and east to west.
- Low lying valley floor due south towards the river Crouch.
- The DLP's proposed northern boundary (as shown on the plan - right) does not clearly reflect any topographical feature.



TOPOGRAPHY



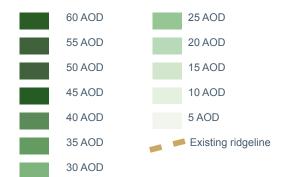
Edwin's Hall

EXISTING RIDGELINE

- A strong ridgeline runs in an east-west direction to the north of the site.
- The highest point to the east is at 60m AOD, locally known as Radar Hill.
- The highest point to the west is at 39m AOD at Mill Hill.
- The landform creates a bowl like feature to land east of the B1418, in which new houses could potentially sit.
- The B1418 dissects the two hills to the north of the allocation.



Woodham Ferrers



4

TOPOGRAPHY



DEVELOPMENT GRADIENT

- Development gradients (i.e. areas in which the gradient is considered suitable for housing development) have been identified as a starting point for the testing of the northern boundary.
- In this instance, areas considered suitable for built form are where gradient is greater than 1:12 (i.e. areas that are less steep).
- This gradient figure has been specified as an adopted standard in 'Part M -Access to and use of Buildings' of the Building Regulations 2016.
- The yellow hatching on the plan (right) shows where the gradient is 1:12 or greater (ie. less steep) and, therefore, potentially developable.





Development sites with obtained planning permission



Area where gradient is no greater than 1:12

CCC Preferred Option boundary



SETTING OF EDWIN'S HALL, AND PROMINENT LANDSCAPE FEATURES (VISIBILITY STUDY A)

- Having established an area of suitable development gradients, this section examines the potential visual envelope of the northern edge of the proposed development on the wider landscape, in particular on the land to the north and the effect on the ridgeline and on the listed building at Edwin's Hall.
- The plan (right) shows four visibility test points, taken from the DLP's proposed northern site allocation boundary.
- The composite study, shown, identifies that the buildings at Edwin's Hall do not have any visibility to the site.
- Each visibility test point has been carried out using the same methodology*:
 - Buildings of up to 8.5m in height are assumed to be located at each visibility test point.
 - Testing is for the north-eastern edge of the development only and does not show the visibility envelope of the whole development.
 - The tests are also "bare earth" tests which omit any existing built form and vegetation that may screen areas. It is, therefore, a worst case scenario.
 - The areas coloured red on the plan are those areas from where an 8.5m tall building on each of the four test points CANNOT be seen.





VISIBILITY STUDY B.

- The plan (right) undertakes the same assessment, this time from revised visibility test points.
- The new visibility test points are broadly in line with the northern extent of the area of land considered as being suitable for development.
- The visibility test points are located on land ranging from 20-30 AOD.
- The plan shows that despite moving the visibility test points further north, the area from which 8.5m tall buildings on each point can be seen is not markedly different than the previous plan (DLP northern boundary).
- Again, the buildings at Edwin's Hall do not have any visibility to the site.
- Each visibility test point has been carried out using the same methodology*:
 - Buildings of up to 8.5m in height are assumed to be located at each visibility test point.
 - Testing is for the north-eastern edge of the development only and does not show the visibility envelope of the whole development.
 - The tests are also "bare earth" tests which omit any existing built form and vegetation that may screen areas. It is, therefore, a worst case scenario.
 - The areas coloured red on the plan are those areas from where an 8.5m tall building on each of the four test points CANNOT be seen.





VISIBILITY STUDY C.

- The plan (right) shows the impact of moving the visibility test points further north still.
- Visibility test points range from 25 - 35 AOD (west to east).
- The hilltops that make up the ridgeline to the north of the site would still predominantly screen the wider landscape.
- Point 1C can also be seen from a wider area to the north - the southeast edge of Woodham Ferrers.
- Limited impact on Edwin's Hall Farm.
- Each visibility test point has been carried out using the same methodology*:
 - Buildings of up to 8.5m in height are assumed to be located at each visibility test point.
 - Testing is for the north-eastern edge of the development only and does not show the visibility envelope of the whole development.
 - The tests are also "bare earth" tests which omit any existing built form and vegetation that may screen areas. It is, therefore, a worst case scenario.
 - The areas coloured red on the plan are those areas from where an 8.5m tall building on each of the four test points CANNOT be seen.





VISIBILITY STUDY D.

- As a further test the visibility test points were moved further north and to the top of the ridge.
- These visibility test points range from 20 - 40 AOD (west to east).
- Any 8.5m tall building on these visibility test points would be seen from the landscape areas to the north including the eastern aspect of Woodham Ferrers.
- However, these test points would still have only a limited impact on Edwin's Hall Farm.
- Each visibility test point has been carried out using the same methodology*:
 - Buildings of up to 8.5m in height are assumed to be located at each visibility test point.
 - Testing is for the north-eastern edge of the development only and does not show the visibility envelope of the whole development.
 - The tests are also "bare earth" tests which omit any existing built form and vegetation that may screen areas. It is, therefore, a worst case scenario.
 - The areas coloured red on the plan are those areas from where an 8.5m tall building on each of the four test points CANNOT be seen.

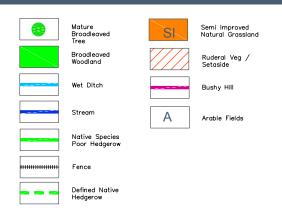


FIELD PATTERN AND WOODLAND



FIELD PATTERNS AND ECOLOGY

- Mature hedgerows create strong field boundaries across parts of the area.
- Many hedgerows populated with significant trees such as Oaks.
- Edwin's Wood, situated to the east of the site, creates a strong edge.
 Edwin's Wood has a blanket TPO.
- Local Nature Reserve neighbouring and overlapping into site.
- DLP northern boundary does not follow any such hedgerow or woodland features.
- However, field patterns, defined by hedgerows (particularly historic hedgerows) and important woodland blocks are important contextual features for Edwin's Hall.



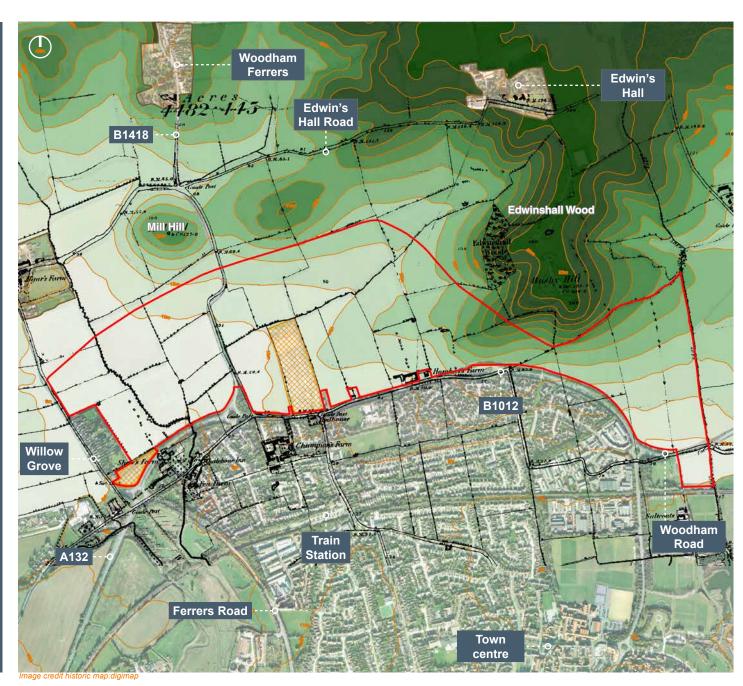


FIELD PATTERN AND WOODLAND



HISTORIC FIELD PATTERNS

- The plan (right) shows the historic network of hedges across the site. This plan is from 1880s.
- Parts of the existing hedgerow network are historic and there is potential to recreate/reinforce these on the site and along the northern boundary to help create development blocks.
- This will help to create a robust edge, help contain development and also bring wider ecological benefits to the site.

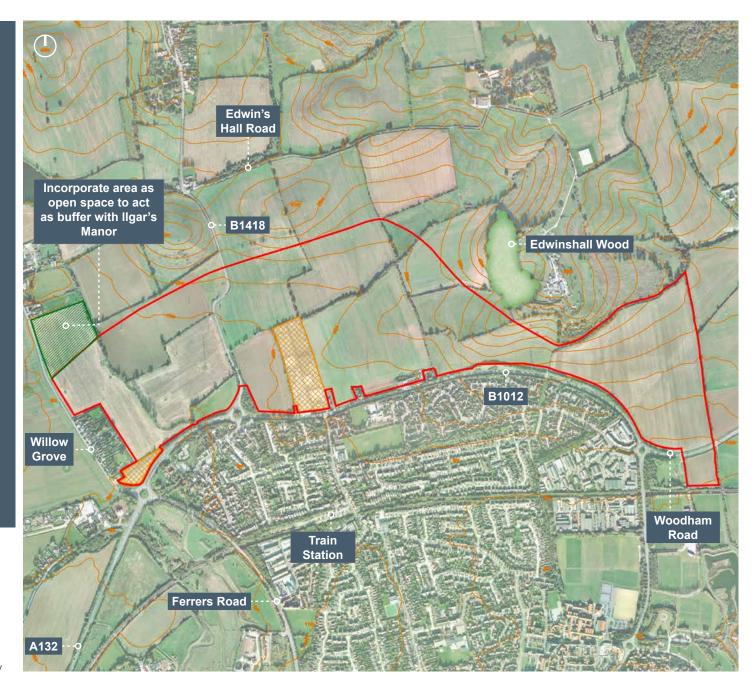


FIELD PATTERN AND WOODLAND



OPEN SPACE

- The plan (right) shows Edwinshall Wood, which forms a natural edge to the north eastern part of the site.
- An area of land to the north-west of the site should be considered as an addtion to the allocation as it is preferential for open space due to its low lying and relatively level gradient.
- It is, therefore, considered that this area should be retained and included within the boundary as it is clearly defined by existing hedgerows and acts as a definitive boundary with the small Hamlet due north. This area includes the listed building, Ilgar's Manor.





Area of open space



Edwin's Wood

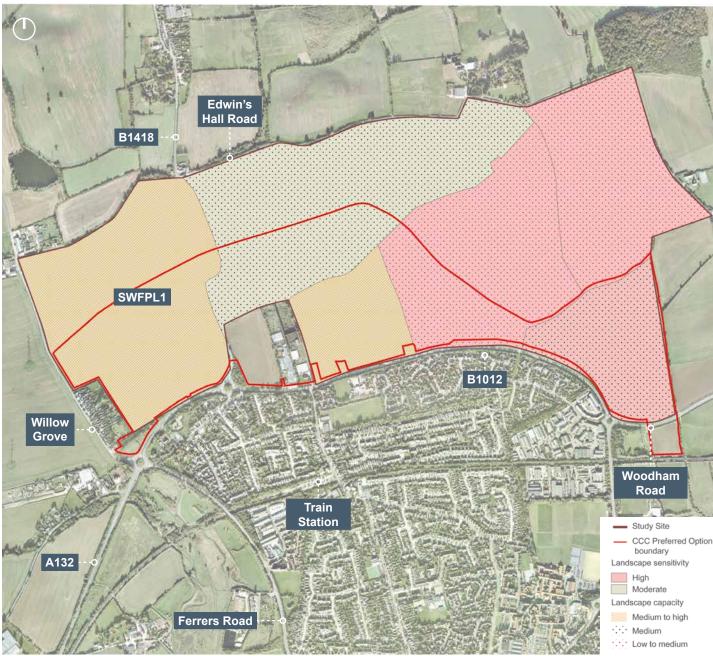


CCC Preferred Option boundary



REVIEW OF LANDSCAPE SENSITIVITY AND CAPACITY ASSESSMENT (LSCA) MARCH 2017

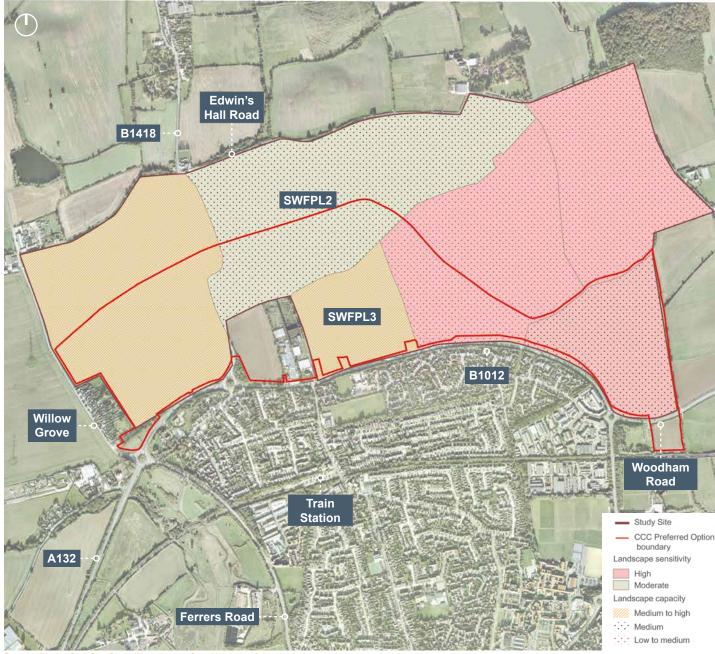
- This section reviews the Councils LSCA for the purposes of the LSCA the area north of South Woodham Ferrers and south of Edwin's Hall Lane has been subdivided into six parcels, SWFLP1-6. Each area is reviewed in terms of its location, description and characteristics. An assessment of sensitivity to development, landscape value and capacity to absorb development is made for each parcel.
- SWFLP1 This parcel lies between Willow Grove and the B1418. It is assessed as being of moderate sensitivity, low landscape value and medium to high capacity, subject to the northern and western edges being kept free from development.





REVIEW OF LANDSCAPE SENSITIVITY AND CAPACITY ASSESSMENT (LSCA) MARCH 2017

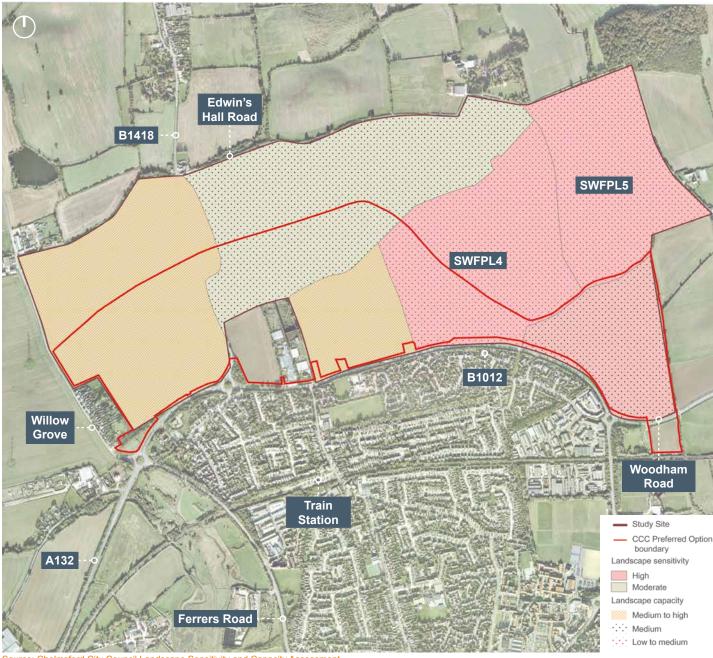
- SWFLP2 This parcel lies between Edwin's Hall Lane in the north and the line of the existing watercourse. It is assessed as being of moderate sensitivity, moderate landscape value and medium capacity. The LSCA recognises that the lower central part of the parcel is more able to accommodate development than the higher northern areas.
- SWFLP3 This parcel lies north of the B1012. It is assessed as being of moderate sensitivity, low landscape value and medium to high capacity.





REVIEW OF LANDSCAPE SENSITIVITY AND CAPACITY ASSESSMENT (LSCA) MARCH 2017

- NVFLP4 This parcel lies on rising ground north of the B1012 and south of Edwin's Hall Lane and includes Bushy / Radar Hill and Edwinshall Wood. It is assessed as being of high sensitivity, moderate landscape value and low to medium capacity. The LSCA recognises that the lower south-western part of the parcel is more able to accommodate development than the higher northern and eastern areas. This analysis reflects the fact that the south-western side of the wider parcel is lower-lying and enclosed by the higher land to the north and east.
- SWFLP5 This parcel lies on high ground to the east of Bushy / Radar Hill. It is assessed as being of high sensitivity, moderate landscape value and low to medium capacity.

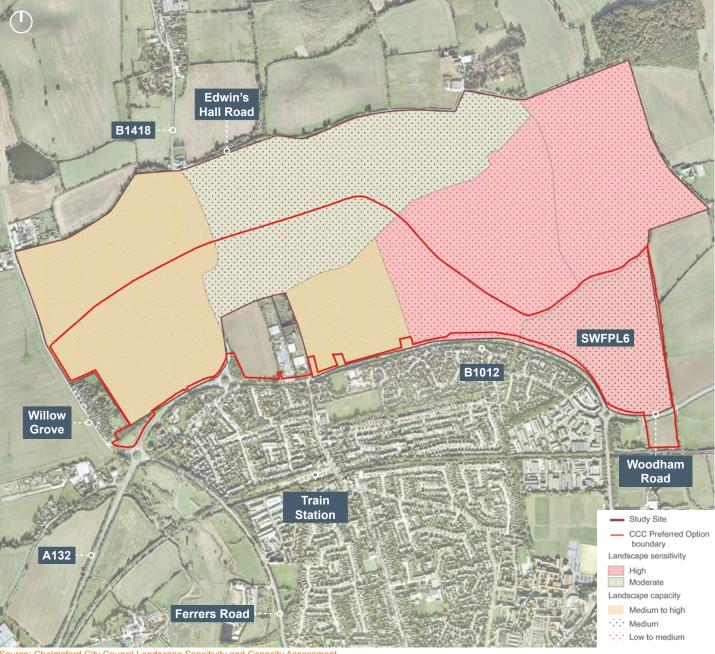




REVIEW OF LANDSCAPE SENSITIVITY AND CAPACITY ASSESSMENT (LSCA) MARCH 2017

SWFLP6 - This parcel lies on rising ground north of the B1012 on the eastern approach to South Woodham Ferrers. It is assessed as being of high sensitivity, low landscape value and medium capacity. The LSCA recognises that the lower south-western part of the parcel is more able to accommodate development than the higher northern and eastern areas.

 The Landscape Sensitivity and Capacity Assessment relates to broad parcels of land, and whilst categorising the parcels as a whole in relation to their overall sensitivity, value and capacity, recognises that within the parcels themselves, the landscape sometimes has different attributes. Generally however, that analysis identifies the steeper and higher land to the north and east of the study area (around Radar Hill and Edwin's Hall Road) as the more sensitive landscape, but also recognises landscapes of lower quality and with capacity to accommodate development within the study area



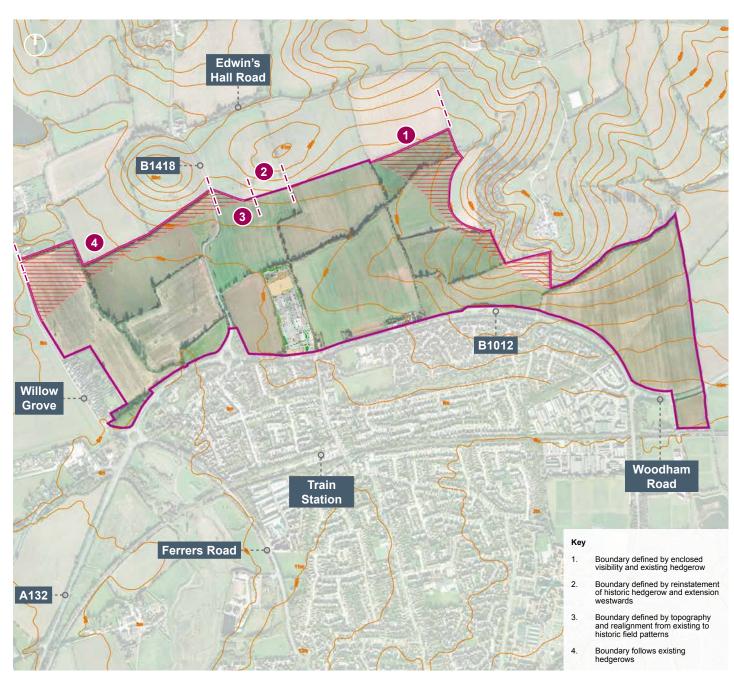
PROPOSED NORTHERN BOUNDARY



SUMMARY

- Based on the preceding analysis, the following pages show two potential options for a revised allocation boundary. The first option uses existing or historic hedgerow lines wherever possible to reflect defined physical features. The second option is based primarily on the visual analysis and the impact of topography in defining an appropriate allocation area, coupled with hedgerows and physical features where these coincide. In both cases, the options show hatched the difference in extent between the proposed boundary and the DLP boundary.
- In this option the proposed northern boundary is based on a combination of:
 - The site's topography (including suitable development gradients);
 - The existing and historic hedgerow / field pattern.
- The plan (right) shows how our proposed northern boundary has been informed by these natural features.
- The proposal identifies minor variations to CCC's preferred option boundary.

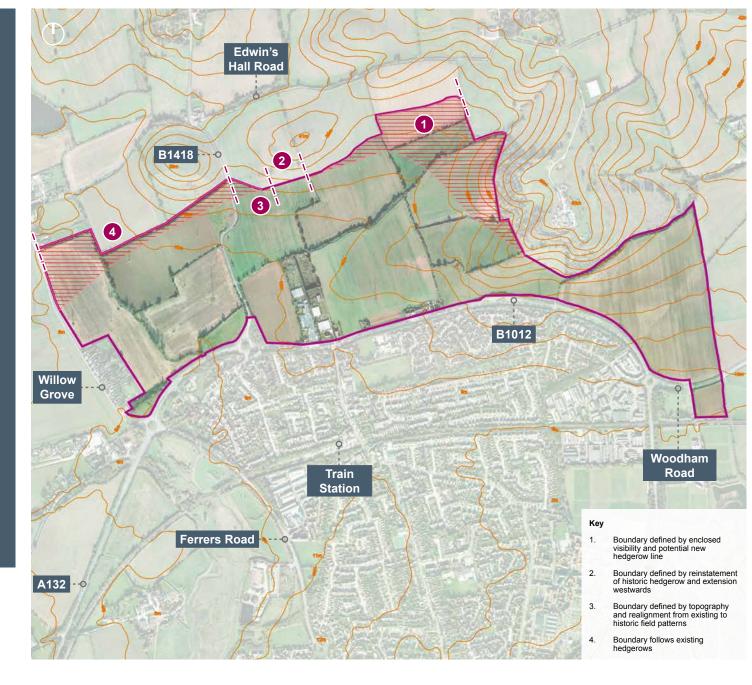


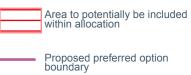


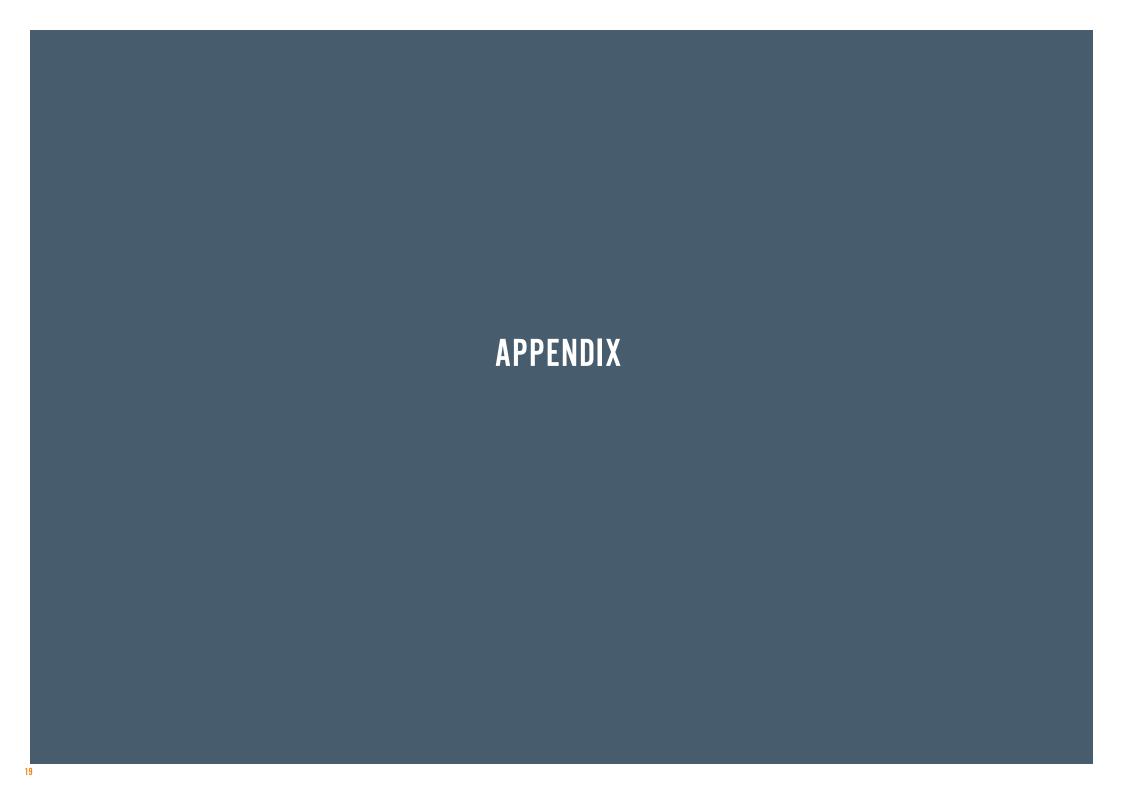
PROPOSED NORTHERN BOUNDARY

SUMMARY

- In this option the proposed northern boundary is based on a combination of:
 - The site's topography (including suitable development gradients);
 - The site's visual impact on the surrounding area;
 - The existing and historic hedgerow / field pattern; and
 - The LSCA's assessment of the site in particular to landscape sensitivity.
- The plan (right) shows how our proposed northern boundary has been informed by these natural features.
- The proposal identifies minor variations to CCC's preferred option boundary.







METHODOLOGY



THE METHODOLOGY USED TO INFORM THE POSITION OF THE NORTHERN BOUNDARY IS CONSISTENT WITH THE 'GUIDELINES FOR LANDSCAPE AND VISUAL IMPACT ASSESSMENT' THIRD EDITION 2013 (GLVIA3) PUBLISHED BY THE INSTITUTE OF ENVIRONMENTAL MANAGEMENT AND ASSESSMENT AND THE LANDSCAPE INSTITUTE.

THE FOCUS OF THE ANALYSIS WAS TO DETERMINE HOW FAR NORTH THE BOUNDARY COULD EXTEND WITHOUT DEVELOPMENT BEING VISIBLE IN THE LAND NORTH OF THE RIDGE, AND TO PROTECT THE SETTING OF THE LISTED BUILDING AT EDWIN'S HALL.

CONSIDERATION WAS ALSO GIVEN TO THE WIDER VISUAL IMPACT OF THE PROPOSED DEVELOPMENT BUT THIS IS INEXTRICABLY LINKED WITH ITS NORTHERN EXTENT AND POSITION UP THE HILLSIDE.

The methodology for the tests was as follows:

- A 3d model was produced using Ordnance Survey data
- 2. A series of visibility test points were established along the line of each boundary option
- At each test point a visibility test was run assuming buildings of 8.5m high. The test returned a visible / not visible response
- 4. The tests are "bare earth" which omit any existing built form and vegetation that may screen areas. It is, therefore, a worst-case scenario
- The result of each test was recorded, see pages 20 - 26 of this appendix. Green denotes areas where the test point, and therefore development, would be visible.
 Red denotes areas where the test point, and therefore development, would not be visible
- 6. The results were overlaid to produce an aggregated result for each boundary option, see pages 6 9 of the main document.

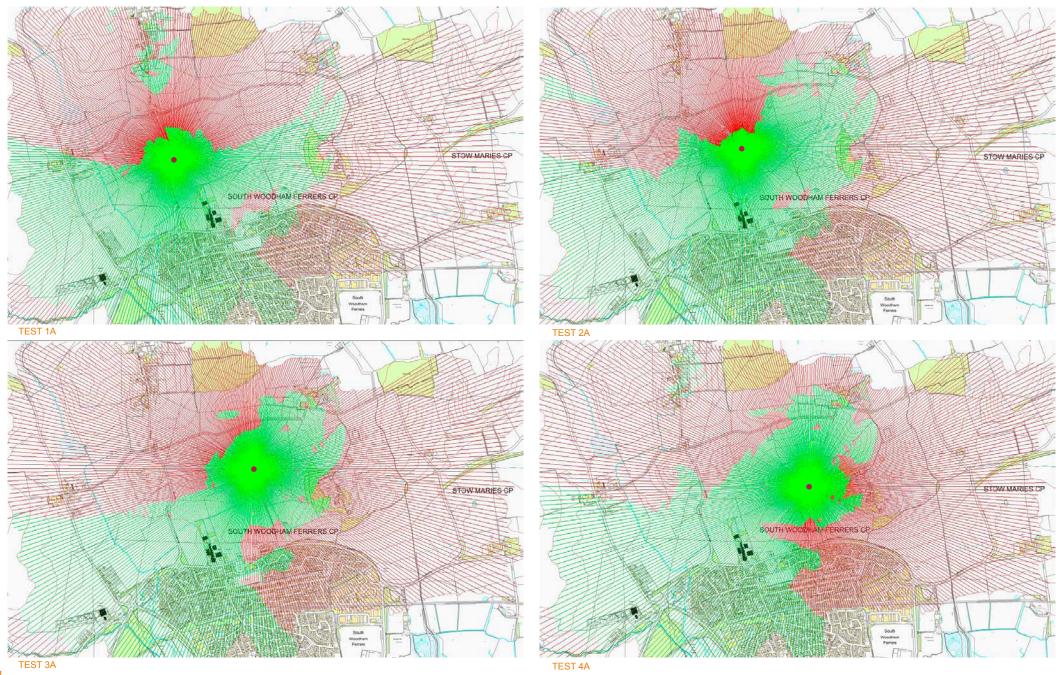
From these tests, it was possible to objectively analyse the relative effects of the four tests.

It is clear that there is a point on the slope where the northern edge of development would become significantly visible in the wider landscape to the north. This is shown in Study D where the area of visibility spills out over the ridgeline. In all options, there would be some visibility form around Edwin's Hall. This is as a consequence of the land sloping toward the test points. In reality, the dense planting around Edwin's Hall would limit any visibility.

The visibility testing was combined with gradient constraints and the field pattern and ecological assets to inform our proposed northern boundary options.

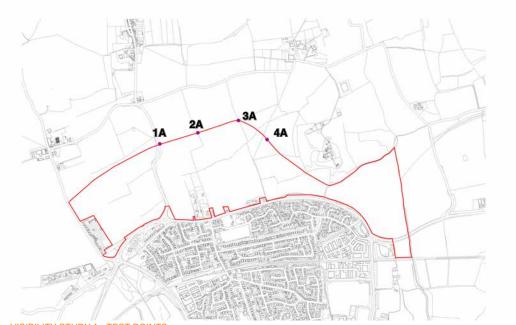
1. VISIBILITY STUDY A - CCC PREFERRED OPTION





1. VISIBILITY STUDY A - CCC PREFERRED OPTION

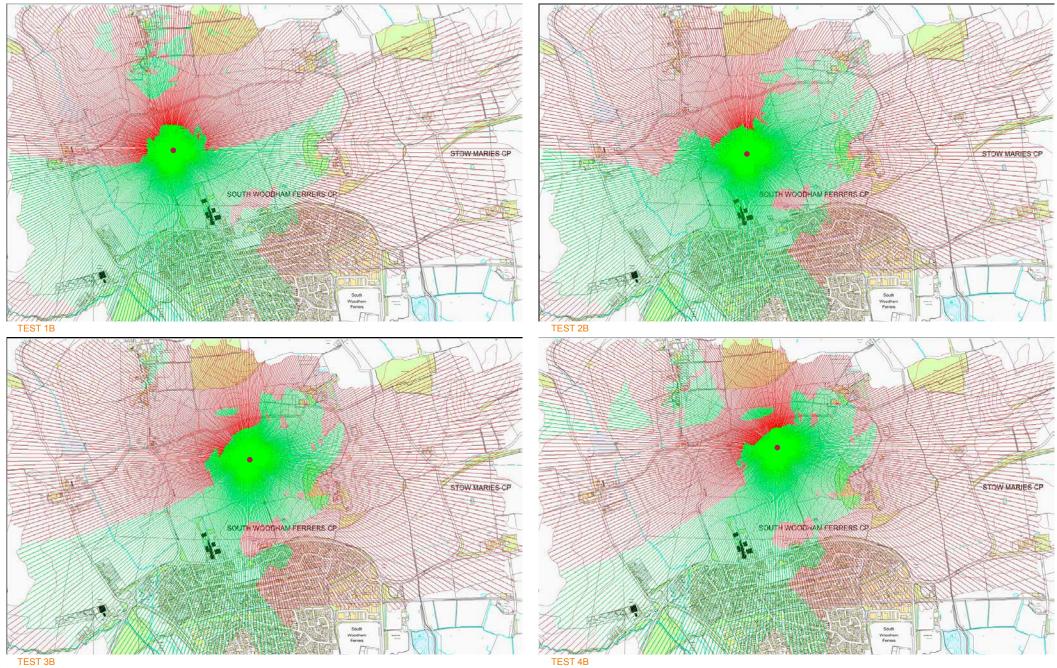




VISIBILITY STUDY A - TEST POINTS

1. VISIBILITY STUDY B

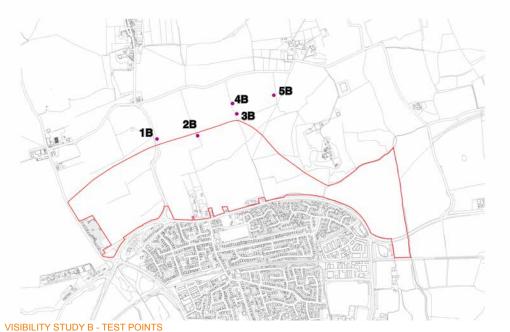




1. VISIBILITY STUDY B







1. VISIBILITY STUDY C

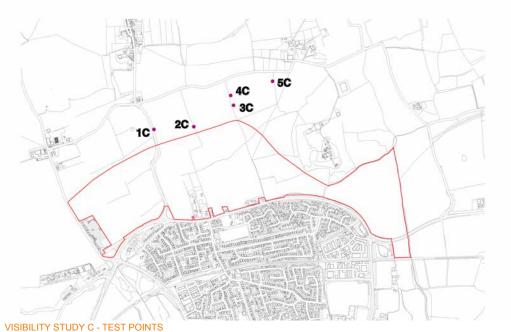




1. VISIBILITY STUDY C



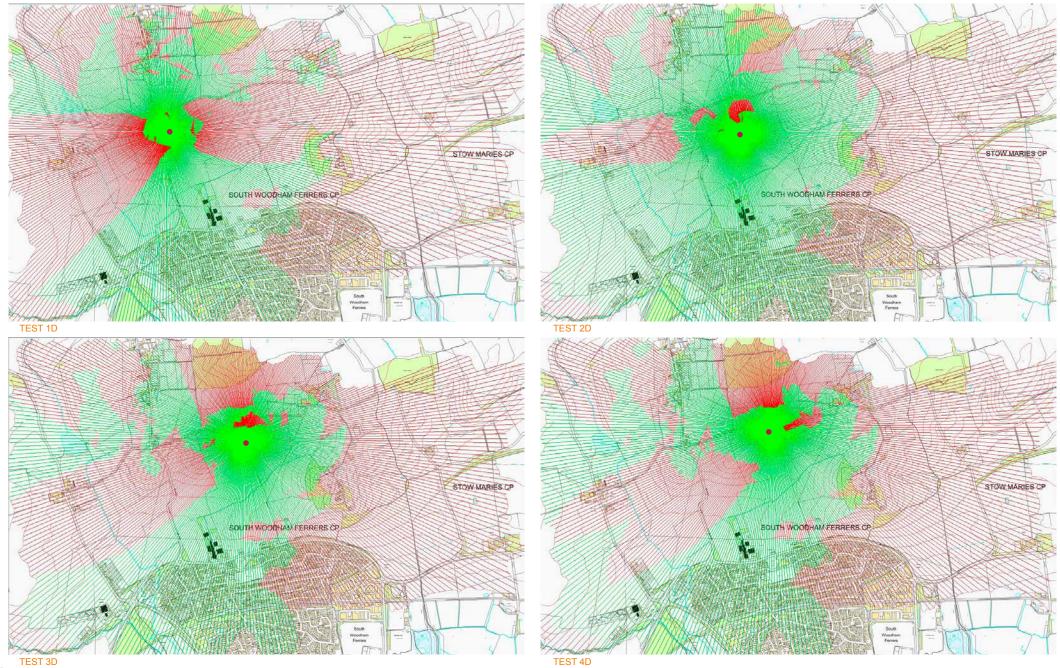




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1. VISIBILITY STUDY D

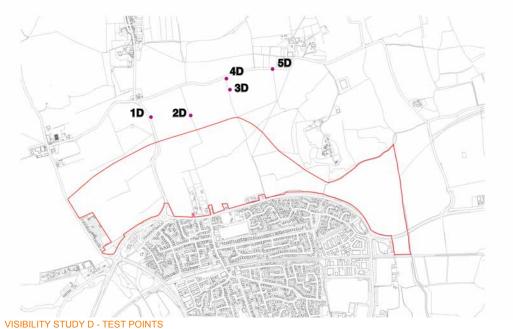




1. VISIBILITY STUDY D







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