



# **Landscape Appeal Statement**

**on behalf of the  
Forest of Dean Council**

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**Land North of Carisbrook  
Road, Mitcheldean.**

**Called in Application:  
P0672/25/OUT**

**September 2026  
INF\_PN260163**

**influence<sup>®</sup>**

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# 1 Introduction

## Qualifications and Experience

- 1.1 My name is Sara Boland. I am a Director of Influence Landscape Planning and Design Limited (Chartered Landscape Architects, Urban Designers and Environmental Planners).
- 1.2 I hold a BA Hons and Postgraduate Diploma in Landscape Architecture from Leeds Metropolitan University and am a Chartered Member of the Landscape Institute. I have worked as a Landscape Architect for over 30 years, Managing Director of Influence Landscape Planning and Design and specialising in landscape planning for the past 20 years.
- 1.3 I have significant experience in advising on landscape matters, on a range of projects in all sectors. These include carrying out Landscape and Visual Impact Assessments, Feasibility Studies, developing Strategic Masterplans and advising on mitigation.
- 1.4 The evidence which I have prepared and provided for this Statement is true to the best of my knowledge. It has been prepared and is given in accordance with the Code of Practice of the Institute of Environmental Management and Assessment, and I confirm that the opinions expressed are my true and professional opinions.

## Outline

- 1.5 The Appeal is against the refusal of Planning Application P0672/25/OUT for development of:
  - Construction of up to 180 residential dwellings (including affordable housing) with public open space, landscaping and vehicle access points (all matters reserved except for means of access) at land north of Carisbrook Road, Mitcheldean.
- 1.6 Reasons for Refusal 2 ("RfR") state that (emphasis added):
  - 02. The proposal would be contrary to policies CSP 1, CSP 4 and CSP 5 of the Core Strategy, policy AP1 of the Allocations Plan and the advice in the National Planning Policy Framework in that it **would create a suburban form of development in this rural location** on the best and most versatile agricultural land and this would mitigate against the food security of the nation as advised by the government in the Government Food Strategy for England, considering the wider UK Food System (2025) which would be **out of character with the surroundings and would therefore represent an unacceptable adverse impact on the character and appearance of the area.**

## Scope of this Report

- 1.7 This Proof of Evidence will substantiate the RfR and the Officers comments insofar as they relate to landscape and visual matters those being as follows:
  - the introduction of a suburban form of development in this rural location
  - the level of adverse effect on the character and appearance of the area.

1.8 Amongst other things, this Hearing Statement will also review :

- The submitted CSA Environmental LVIA;

1.9 A Site Visit was carried out on the 31<sup>st</sup> August 2026 where the Site (from public vantage points only) and the surrounding roads and Public rights of way were visited.

## **The Proposal**

1.10 As set out in the LVIA at 5.2, the Proposals of the Site are

- in outline, are for a residential development of up to 180 dwellings, with associated infrastructure and public open space, incorporating a Locally Equipped Area of Play ('LEAP'). The new housing will be 2 storeys in height. A Development Framework Plan has been prepared which shows how development at the Site could be delivered<sup>1</sup>

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<sup>1</sup> Design and Access Statement Parts 1 & 2 May 2025, CSA

## 2 Planning Policy Context

### Introduction

- 2.1 Aspects of planning policy and guidance of relevance to my evidence are summarised below. The assessment process and judgements operate independently of policy. Policies will indicate how much weight could, should or may be attached to certain findings of an assessment in decision-making.<sup>2</sup>

### National Planning Policy Framework

- 2.2 The Government published the National Planning Policy Framework (NPPF) on 27 March 2012. A new NPPF was published on 17<sup>th</sup> August 2026
- 2.3 At the heart of the NPPF is a presumption in favour of sustainable development and this should be at the core of plan making and decision taking. For decision taking this means approving proposals that accord with the development plan, or where the development plan is absent or silent or relevant policies are out of date, granting permission unless doing so would generate adverse impacts that would significantly and demonstrably outweigh the benefits, when assessed against policies within the NPPF.
- 2.4 The RfR sets out that the Proposals conflict with the NPPF but is not specific on which section or paragraphs.

### Local Planning Policy

- 2.5 The Application Site is located within the administrative jurisdiction of Forest of Dean District Council, with The Forest of Dean District Council Core Strategy Adopted February 2012 as the main policy document. The Core Strategy is supported by the Strategic Housing and Employability Land Availability Assessment 2026 (SHELAA), Allocations Plan 2006 to 2026, adopted June 2018 and the Mitcheldean Neighbourhood Development Plan 2016-2026 which are also to be referred to.
- 2.6 The Council's RfR references the below relevant policies within the Core Strategy:
- CSP 1 Design and environmental protection
  - CSP 4 Development at Settlements
  - CSP 5 Housing
  - CSP 9 Recreational and amenity land
- 2.7 The Council's RfR includes reference to the below relevant policies within the Allocations Plan:
- AP1 Sustainable Development
  - AP7 Biodiversity

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<sup>2</sup> TGN\_2024\_01 Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third edition (GLVIA3) 1(2) & 5(6)

- 2.8 The Council's RfR includes reference to the below relevant policies within the Neighbourhood Plan:

- H2 Gateway and outside settlement boundary (outside the village)

- 2.9 A summary of relevant policy requirements are as follows:

## **Forest of Dean District Council Core Strategy Adopted February 2012**

### **CSP 1 Design and environmental protection**

- 2.10 Under this policy, new developments must take into account important characteristics of the environment and conserve, preserve or otherwise respect them in a manner that maintains or enhances their contribution to the environment. The policy identified a number of considerations which will be taken into account, with the following of relevance;
- 2.11 *'The effect of the proposal on the landscape including AONBs and any mitigation/enhancement that is necessary or desirable and*
- 2.12 *The impact on any protected sites (natural and historic sites and heritage assets and potential for avoiding and/or mitigating any impacts, or providing enhancement, should the development be acceptable'*
- 2.13 Development that is not able to satisfactorily meet the above will not be permitted.

### **CSP 4 Development of Settlements**

- 2.14 Policy CSP4 is a strategic planning policy, its main purpose being to maintain the existing settlement pattern in manner that emphasises the importance of towns, with the following principles applied:
- 2.15 *'Most changes in towns and villages will be expected to take place within the existing settlement boundaries. Areas outside settlement boundaries will be treated as part of the open countryside.'*
- 2.16 Proposals will be expected to improve the quality of their environment, the general rural character of the district and any protected environments such as Conservation Areas.

### **CSP 5 Housing**

- 2.17 Policy CSP4 is a strategic planning policy, its main purpose being able to promote thriving sustainable communities through providing affordable homes. Housing in keeping with the needs of the local community and including affordable housing will be provided as described for Mitcheldean:
- 2.18 *'Mitcheldean – number to be provided by 2026: about 101 (60) – yet to be identified (Mar 2010): 41'.*
- 2.19 *Developments for affordable housing in 'small groups and single affordable dwellings will be acceptable where they are well related to the settlement concerned and take account of any protected open spaces and other areas. Such sites will usually be within or immediately adjoining a settlement boundary.'*

## **CSP 9 Recreational and amenity land**

- 2.20 Policy CSP 9 is a strategic planning policy, with its main purpose in providing quality environments through protection of amenity land, protection of recreational use and recreational provision for new development.
- 2.21 *'The change of use or other development of land that does not contribute to the character of an area and is therefore of little amenity value may be considered.'*
- 2.22 *The purpose of the policy is to protect recreational and amenity land and to ensure that any recreation space that may be lost is replaced. It also ensures that there is adequate provision made for new development.'*

## **Forest of Dean District Council Allocations Plan 2006 to 2026**

### **AP1 Sustainable Development**

- 2.23 The purpose of policy AP1 is *to illustrate how the sustainable development aims of the CS can be achieved and to provide a policy expressing these aims in manner which is in keeping with the NPPF.*
- 2.24 *In assessing planning applications, the primary consideration will be whether the development proposed is sustainable with the overall aim of improving the economic, social and environmental conditions of the area. Allocations in accord with the CS and the AP and in any completed neighbourhood plans can be implemented in a sustainable manner and planning applications in accord with these will be permitted subject to any other material considerations. Reference will be made to the guidance in the CS, AP and NPPF/ NPPG in making the required judgements.*
- 2.25 *This policy is intended to set out the basic principle that development proposals and allocations should be sustainable. Development that does not meet the requirements set out in national guidance and in the CS will not be and should not therefore be permitted.*

### **AP7 Biodiversity**

- 2.26 The purpose of policy AP1 is *'to ensure that there is a net gain biodiversity through the implementation of the Plan, in keeping with the NPPF.'*
- 2.27 *This policy highlights the importance and context of biodiversity in the District and in so doing identify some of the important environmental characteristics referred to in the Core Strategy (CSP1). It supports the delivery of the Biodiversity 2020 strategy promoting multifunctional development and ecological networks improving ecological resilience. It requires proposals to demonstrate enhancement, to safeguard features or show that it is not possible.'*

## **Mitcheldean Neighbourhood Development Plan 2016-2026**

### **H2 Gateway and outside settlement boundary (outside the village)**

- 2.28 This document is *'to be read in conjunction with Landscape Impact Policy, Business Policies and Environmental Policies.'*

- 2.29 *Proposed residential development outside the settlement boundary will be supported where one or more of the following circumstances apply:*
- 2.30 *There is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;*
- 2.31 *The development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;*
- 2.32 *the development would re-use redundant or disused buildings and enhance its immediate setting;*  
*or*
- 2.33 *the development would involve the subdivision of an existing residential dwelling.'*

### **Designations and Registered Sites**

- 2.34 The Application Site is not located within any national or local nature, heritage or landscape designation.
- 2.35 Mitcheldean settlement sits immediately to the south of the Site, with 'intensification of employment generating use' and 'housing allocations' located within the settlement of Mitcheldean, approximately located south and southeast of the Site. There are also several listed buildings within Mitcheldean south of the Site. There is also a Conservation Area within Mitcheldean.
- 2.36 There is an extensive network of woodland within the study area, in particular to the west and northwest of the Site, where there is a SSSI, ancient woodland and key wildlife sites.

### **Public Rights of Way and Designated Walks**

- 2.37 There are no Public Right of Way (PRoW) running across the Site.
- 2.38 The nearest PRoW Bridleway MITCHELDEAN BRIDLEWAY 6 lies to the northwest of the Site and extends west from Ross Road and linking to footpath MITCHEALDEAN FOOTPATH 45 where it travels south connecting to other PRoWs within the Mitcheldean settlement.
- 2.39 MITCHELDEAN FOOTPATH 20 lies to the east and extends from Bradley Close Road and travels round the eastern settlement boundary of Mitcheldean. <sup>3</sup>

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<sup>3</sup> Appendix A - N260163(08)001 ZTV and Viewpoint Location Plan

### 3 Review of submitted Landscape and Visual Appraisal

- 3.1 A Landscape and Visual Impact Assessment was completed in March 2025 by CSA Environmental.
- 3.2 This Hearing Statement will not reproduce the LVIA but will summarise the relevant key points and set out further detail, particularly in terms of the Landscape and Visual Baseline. Emphasis in this statement is placed on the elements which are relevant to the RfR.

#### Overall quality of the report

- 3.3 The report is described as a Landscape and Visual Impact Assessment (LVIA) however, in my opinion there are components missing which we are commonly used to support an LVIA. These are :
- A ZTV – a tool to define the study area (GLVIA3 7.21)<sup>4</sup>
  - Winter (leaf off) photography<sup>5</sup>
  - An evidenced cumulative assessment<sup>6</sup>
  - A complete construction phase<sup>7</sup> and lighting assessment
  - No threshold for significance in the methodology<sup>8</sup>
  - Full reporting of the Substantial Adverse judgements<sup>9</sup>
- 3.4 In the CMC notes the Inspector has asked for table to compare the areas of agreement and difference on landscape matters.<sup>10</sup> This is found at Appendix 3 and is summarised in the main evidence.

#### Landscape Baseline

#### Summary of Landscape Character

- 3.5 The LVIA sets out the relevant national, county, district and neighbourhood-level policy and landscape character evidence (Sections 2–3), including the Forest of Dean District Landscape Character Assessment, the Landscape Strategy, and — usefully — the Parish's own Neighbourhood Development Plan landscape character assessment and its locally identified valued views.

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<sup>4</sup> Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs) Technical Guidance Note 1/20 (10 Jan 2020) Step 2 bullet a

<sup>5</sup> Technical Guidance Note 06/19 Visual Representations, paragraph 2.4, Appendix 10, page 49 and GLVIA3, paragraph 6.28, 8.15

<sup>6</sup> Technical Guidance Note 1/20 (10 Jan 2020) Step 2, bullet I & Step 3, bullet a

<sup>7</sup> Technical Guidance Note 1/20 (10 Jan 2020) Step 2, bullet J

<sup>8</sup> Technical Guidance Note 1/20 (10 Jan 2020) Step 2, bullet I & Introduction para 3, page 2

<sup>9</sup> Technical Guidance Note 1/20 (10 Jan 2020) Step 2, bullet a

<sup>10</sup> Paragraph 13 CMC Summary notes

3.6 These are:

**National Character Areas**

3.7 Forest of Dean and Lower Wye Valley (Area 105)

**District Landscape Character**

3.8 Mitcheldean lies within the Forest of Dean District Landscape Character Assessment (Nov 2022) – Ridges and Valleys LCT 10. The settlement lies across two sub areas – the western part of the settlement and the adjoining valley side fall in LCA10C Edge Hill and the eastern part of the settlement and adjoining valley side in LCA 10D. The Site lies in LCA 10D.

3.9 With regard to the settlement, it notes that *'The largest settlements in the landscape type are Mitcheldean and Drybrook. Both settlements have a historic core although they have been subject to much expansion'*<sup>11</sup>.

3.10 The relevant extracts of those studies are as set out on Page 11 and 12 of the LVIA

3.11 No reference is made to the Forest of Dean Landscape Supplementary Planning Document (SPD) Adopted in March 2007 which sets out important principles relating to the environment and more specifically, the landscape, and provides guidance for anyone involved in development, planning or design.

3.12 It sets out the process and expectations of information submitted to support planning applications and is an important reference document.

3.13 The Forest of Dean produced a Landscape Strategy June (2004) which The landscape strategy provides an overview of the forces for change affecting the landscape of the district and presents a range of potential landscape and land management strategy ideas for the individual landscape character types.

3.14 The Key issues are summarised at 2.2.2 of the Landscape Strategy including

- The expansion of existing towns and villages and the disproportionate growth of settlements with good transport links.
- Standardised housing designs on the fringes of existing settlements which may compromise their distinctive characteristics and landscape setting and threaten to consume the characteristic intra settlement open spaces which define individual settlements, particularly those surrounding the central forest core.

3.15 With regard to Residential Development, it sets out at on page 8 that

- However, within the district, as with many areas of the country, there are examples of housing developments which make little or no reference to local landscape character, building styles and materials. This is a particular issue on the fringes of existing settlements where new residential development has not always been compatible with existing forms and patterns of development and has resulted in some cases, in a loss of distinctiveness and a diminished sense of identity. Such 'urban fringe' developments can have a detrimental impact on landscape and townscape character but can also provide opportunities to enhance the appearance of the district's towns and villages

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<sup>11</sup> Page 131

3.16 At page 69, the Landscape Strategy sets out the 'Key Environmental Features to Conserve and Enhance' which include:

- The ridges are orientated north south which is emphasised by the orientation of hedgerow patterns and small woodland copses clinging to steeper slopes. The orientation of the hills and features gives the landscape a strong grain.
- Extensive views over the surrounding lowlands are possible from exposed ridge top locations and act as reminders of the ridge's strategic importance throughout history.

3.17 The table on Page 70 includes the following row

| <b>Local Forces for Change</b>                  | <b>Potential Landscape Implications</b>                                                                                                                                                                                                                                                   | <b>Outline Landscape Strategies</b>                                                                                                                                                                                                                                                                                                                           | <b>Potential Indicators for Monitoring Landscape change</b>                                                  | <b>Opportunities for Community Involvement</b> |
|-------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|------------------------------------------------|
| Expansion of existing valley floor settlements. | <p>Intrusion of new built development into rural landscapes.</p> <p>Expansion of built up areas beyond the lower ridge sides and valley floor onto visually prominent upper ridge slopes.</p> <p>Infill development eroding dispersed character of some settlements along main roads.</p> | <p>Conserve the distinctive linear character of the valley floor settlements and avoid siting new built development on visually prominent ridge sides.</p> <p>Conserve the landscape setting of Mitcheldean and Drybrook.</p> <p>Seek to enhance the setting of valley settlements through woodland planting that links to existing ridge-side woodlands.</p> | <p>Location and extent of new development permitted.</p> <p>Distance between built edges of settlements.</p> | Preparation of Village Design Statements       |

|  |  |                                                                                                         |  |  |
|--|--|---------------------------------------------------------------------------------------------------------|--|--|
|  |  | Conserve stretches of presently undeveloped valley to prevent amalgamation of valley floor settlements. |  |  |
|--|--|---------------------------------------------------------------------------------------------------------|--|--|

### **Landscape Observations of the Application Site and its immediate surroundings**

- 3.18 The site is described in Section 4 of the LVIA, and I am generally in agreement. Key descriptors are:
- The Site has a distinctly domed landform, rising several metres above the adjoining highways to a high point a short distance beyond the midpoint of the northern boundary.
  - There are no landscape features located within the interior of the Site, with vegetation confined to the periphery.
- 3.19 However, the LVIA does not set out any of the perceptual and experiential qualities of the Site and moves straight on to views and viability. The wider landscape to the north of the Site, relevant to this Proposal are not described at all.
- 3.20 Views are recorded to the north of the Site however there is no description of the immediate landscape around the Site which contributes to the understanding of the wider potential effects of the Proposals.

### **Local Landscape Description**

- 3.21 As described in the LVIA, the Site is an arable field on the northern extent of the settlement of Mitcheldean. The topography of the Site is a distinct feature, rising close to the settlement edge in parallel with the surrounding roads, connecting into the field network to the north. The change in level from Carisbrook Road is distinct and pronounced as shown in Photo 1 below.



Photo 1 – view looking from the junction of Bradley Court Road and Carisbrook Road towards the Site

- 3.22 The site is part of the wider rural landscape which contributes to the setting of Mitcheldean, and contains it within the valley bottom. The topography of the valley undulates from 160m AoD to the south of the settlement, to 140 m AoD around the church and then dropping to 137m AoD approximately at Carisbrook Road. The Site, as is shown, then rises back to 160m AoD, before continuing this rolling landscape character.
- 3.23 That strong connection to the wider field network and the countryside beyond is particularly apparent from views from the higher ground to the west, where the Site is seen as part of the rolling field pattern to the north and east of the Site. Conversely when viewed from the north east on the Wysis Way, the role of the Site, containing the extent of the settlement edge is apparent. (Photo 3) The character of the settlement, contained by the surrounding higher ground, and the relationship to the Site are clear.



Photo 2 – view looking from the PRoW above the recreation ground to the south west of the Site



Photo 3 – view looking south west towards the Site from near the junction of the Wysis Way and Bradley Court Road.

- 3.24 The edge of the settlement is settled and quiet. There is employment land to the south east of the Site but it is relatively low key and doesn't impact on the perceptual qualities of the local

landscape. The local landscape has a strong sense of place and reads as perceptually and functionally separated from the Settlement, in part due to the topographical change and in part due to the strong rural qualities. It comprises a strong PRoW network, including the Wysis Way, a 52 mile walk, beginning of the Thames Path National Trail in Gloucestershire, this walk crosses the distinctive areas of the Forest of Dean, the Severn Vale and the Cotswold and is accompanied by a Guidebook.



Photo 4 – looking north towards Laines Farm along Mitcheldean Footpath 3

- 3.25 As shown in Photo 4, the Site is commensurate with the surrounding landscape – a landscape of irregular fields, small farmsteads, large single dwellings, sparse individual trees, historical remnants and woodlands.
- 3.26 Although it doesn't describe the wider landscape, the LVIA judges that the wider landscape has a high landscape sensitivity
- 3.27 The LVIA judges that the sensitivity of the Site itself is medium. I agree with these judgements and the relative susceptibility and value that contribute to them, however it is important that the basis for these judgements is clearly evidenced through the LVIA which I don't consider it is.

## Visual Baseline

- 3.28 Prior to consideration of the visual receptor assessment, there are several relevant points to make:
- There is no ZTV accompanying the LVIA. In order to support the field assessment, I ran a ZTV and plotted the CSA viewpoints on it<sup>12</sup>. The viewpoints correspond to the ZTV.
  - The views were recorded in June 2024 and the LVIA is dated March 2025 and in my opinion winter views could have been recorded to support the summer views. As a footnote to the table SVE (on the final page of the LVIA), it is set out that *when the vegetation is out of leaf views from Ross Road will be slightly more open. There will be little impact on other views from the surrounding area.*
  - Viewpoints 23 & 24 were recorded in October<sup>13</sup> 2018 and were not updated for this application. Although there does not appear to be a change in the baseline position there is no explanation of this. It is my understanding that it is good practice to retake any

<sup>12</sup> Appendix A

<sup>13</sup> VP23 states that it was October, but the information data sets out 21.06.18 as the date

photos after 3 years. Site visits were made in 2024 but there is no explanation as to why these 2 views were not updated.

- There is no record of consultation with the LPA on the viewpoint selection.
- The LVIA sets a scale of neutral, negligible, slight, moderate and substantial visual effects (Table VE3). There is no threshold for 'significant'. As set out in TGN\_2024\_01<sup>14</sup>
  - As indicated at GLVIA paragraph 3.33, it is not necessary to establish thresholds for levels of significance, provided that it is made clear whether effects are, or are not, significant. However, typically, effects falling below the middle of the range of overall effect are assessed as not significant. For example, if using a scale of minor/ moderate/ major, then major effects will be significant and minor effects will not be significant. In this example, moderate effects may or may not be significant and justification would be needed in the methodology or receptor assessment as to whether a moderate effect is significant or not.

3.29 Having carried out a field survey, I consider that there is one additional location where viewpoints should have been recorded.

### ***Influence Viewpoints 1 & 2***

3.30 These views are recorded on Mitcheldean Footpath 3 between Laines Farm and the junction of Bradley Court Road and the Wysis Way. This location did not appear on the INF ZTV because the ZTV only shows land where the from which the proposals may theoretically be shown, it is the responsibility of the assessor to check this on Site. During the field survey it seemed appropriate to check the views as this PRoW directly approaches the northern site boundary across the surrounding fields. The views encompass the landscape qualities of the local landscape and the route forms part of The Ross Round<sup>15</sup>

3.31 As receptors approach the Site along this PRoW, their view is drawn to the gap in the woodlands and the mature, quite striking tree just north of the boundary. The view is framed by the open field in the foreground, the wooded rising ground to the west and the vegetation around the dwellings in the mid ground.

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<sup>14</sup> Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third edition (GLVIA3) August 2025, paragraph 3(5)

<sup>15</sup> [The Ross Round – Welcome to Walking in Ross](#) Supported by 'Striding around Ross' a comprehensive illustrated guide. Refer to Appendix 2 for detail



Photo 5 – view looking south from the Ross Round, towards Mitcheldean (Viewpoint 01)

### **Assessment of Landscape and Visual Effects**

- 3.32 With regard to the remaining viewpoints, to support the Inspectors request at the CMC a comparison table has been produced and is found at Appendix 3, summarised in the main evidence.
- 3.33 Despite the statement at M18 of the Methodology there is no guide or table as to how the CSA LVIA combines value and susceptibility to reach sensitivity or how this is combined with magnitude of effect to reach a level of effect/significance of effect. I have shown a table in Appendix 3, based on INF methodology, substituting Major for Substantial. Although assessment should not be dictated to by tables, equally methodology should be followed.
- 3.34 To summarise the table:
- 3.35 The CSA LVIA has underestimated the Magnitude of change and the significance of effect for a number of the visual receptors, primarily located on the higher ground to the east, west and south. Those views are 5, 6, 15, 17, 18, 21, 22, and 23. The judgements have been downplayed primarily due to the Sites perceived association with the existing residential settlement edge. What has not been considered in the assessment is the Sites strong rural setting, the topographical nature of the Site and how that constrains development on it, the elevated position of the receptors resulting in the opportunity for downward looking and long reaching views and the permanent change in views even as a result of the mitigation.

- 3.36 There is an over reliance on the Sites location adjacent to existing residential development and a lack of assessment of the potential effects of positioning dwellings on 'domed' landform. At paragraph 5.4 of the LVIA it is set out that *'New woodland planting at the northern edge of the Site will help contain the development from the farmland which extends along the valley floor to the north and establish a clearly defined boundary between the edge of the settlement and the wider countryside'*.
- 3.37 In response, the site requires 'containing' as it forms part of the network of fields to the north of the settlement edge. As described in this report, it is contiguous with the wider landscape and is legible as part of the rural hinterland to the settlement.
- 3.38 At 5.12, the LVIA states that Development will be visible; however, *it will be closely associated with the existing urban edge and will not intrude significantly on the wider panoramic view of the valley.*
- 3.39 In my opinion, it will intrude on the wider panoramic view and as explained in my assessment in Appendix 3, will in places become the focus of that view.
- 3.40 Section 5.7 of the LVIA seeks to explain the effects through narrative but does not draw the findings of the visual assessment, in terms of the Significance and Nature of the Effects into the narrative
- 3.41 Of the 14 visual receptors group assessed. 10 of them are judged to have a high sensitivity to the Proposals, and 8 have been judged to suffer a moderate or above significance of effect at Year 1, yet the Summary at 6.7 and 6.8 focusses on the context of the existing development in Mitcheldean and concludes that
- This assessment found that whilst the proposed development would result in a significant change in the character of the Site and would impact on a number of views, effects on the wider landscape character would be more limited.
- 3.42 Regarding Landscape Effects, SLE 1 Landscape and Townscape Effects, the table judges that:
- The proposed development will extend the edge of Mitcheldean onto the lower slopes of the ridgeline at Breakheart Hill. Development however will be located within the base of the valley and will be closely associated with other development at the edge of Mitcheldean. It will not extend housing onto the more sensitive valley sides above Mitcheldean. The proposed development would be largely contained by the rising land further north, and new planting in the northern part of the Site would establish a robust boundary, embedding the proposed development area
- 3.43 Development will not be located within the base of the valley, the northern edge of the Sites lies at 160m AoD, the same height as the housing on the valley sides to the west and nearly 30m higher than Carisbrook Road. It will not extend housing onto the sides of the valley; however, it will extend housing on land at the same height as those valley sides. Therefore, this is a moot point about the development not being on the valley sides as it is actually at the same height and therefore is not afforded the 'protection' the writer of the LVIA is trying to give it.
- 3.44 The site is not contained by rising land to the north, in fact the land to the north undulates and by Laines Farm, just under 1km from the northern Site boundary, the topography is 145m AoD.

- 3.45 New planting will not embed the proposed scheme in the way claimed, or at least not for a considerable time, as born out in the Visual Assessment. The planting will not mitigate views from the higher ground, as described in my Visual Assessment.
- 3.46 Table SLE 1 judges the Magnitude of Change on site to be Substantial and Moderate – Slight for the wider landscape. The wider landscape has been assessed as having a High Sensitivity to the Proposals and this combined with a Moderate – Slight Magnitude of Change should result in a Substantial – Moderate significance of effect.

## 4 Summary and Conclusions

### Summary

#### Summary

- 4.1 This Statement has reviewed the submitted Landscape and Visual Impact Assessment prepared by CSA Environmental in support of the Proposals and has undertaken an independent assessment of the landscape and visual baseline and the likely effects of the Proposals. The following sections summarise my findings on townscape character, landscape character and visual amenity, before considering these findings against the development plan policies relevant to Reason for Refusal 1.

#### Impact on Landscape Character

- 4.2 The Site presently reads as an open, undeveloped gap between the built form of Mitcheldean and the wider agricultural landscape to the north. Although it adjoins existing residential development to the west and south, and employment development to the east, its open, elevated character is legible and distinct from that built form.
- 4.3 The Site has a distinctly domed landform, is contiguous with the wider field network to the north, and is perceptually and functionally separate from the settlement of Mitcheldean, both because of the change in topography and because of the strong rural qualities it shares with that wider landscape. It is these qualities, rather than the Site's proximity to existing development, which in my opinion should have informed the LVIA's assessment of landscape sensitivity.
- 4.4 The LVIA's own assertion that the Proposals would be 'located within the base of the valley' and 'largely contained by rising land further north' is not supported by the topography. The northern boundary of the Site lies at approximately 160m AOD – the same height as the existing housing on the valley side to the west, and around 30m higher than Carisbrook Road – and land to the north does not simply rise, but undulates, falling to approximately 145m AOD at Laine's Farm, less than 1km from the Site's northern boundary. The Proposals would not, therefore, sit within a contained valley floor; they would extend built form onto land at the same elevation as the surrounding valley sides, within a landscape that continues to be legible, and visible, well beyond the Site itself.
- 4.5 Nor, in my opinion, would the proposed new woodland planting at the northern boundary 'embed' the development or establish a 'clearly defined boundary between the edge of the settlement and the wider countryside' in the way the LVIA suggests – at least not for a considerable period, and not at all for the many viewpoints which look down onto the Site from higher ground to the east, west and south. The Site does not need 'containing' in the way the LVIA implies, it already forms a legible, functioning part of the rural landscape to the north of the settlement, and it is that landscape, not simply the Site itself, which would be adversely affected.
- 4.6 Applying the LVIA's own methodology consistently, a wider landscape which we agree has a High sensitivity, is subject to a Magnitude of Change assessed as Moderate–Slight, should result in a Substantial–Moderate, not merely a Moderate, significance of effect. On this basis, and for

the reasons given above and earlier in this Statement, I consider that the Proposals would result in significant, adverse and long-lasting harm to the landscape character of the Site and its immediate surroundings and would not conserve the setting of the wider landscape setting of Mitcheldean, contrary to the objectives of the Forest of Dean Landscape Strategy.

### **Impact on Visual Amenity**

- 4.7 I consider that the submitted LVIA underestimates the magnitude of change and the significance of effect for a number of visual receptors, in particular those located on the higher ground to the east, west and south of the Site, at Viewpoints 5, 6, 15, 17, 18, 21, 22 and 23. In each of these locations, receptors experience elevated, downward and long-reaching views over the Site and the wider valley, rather than the more contained, filtered views the LVIA's narrative repeatedly describes.
- 4.8 Because the Site occupies a locally elevated, domed landform, development upon it would be seen not as a minor addition read in the context of existing housing, but as a prominent new element within otherwise open, rural views from this higher ground – and, in several of these views (22, 18, 6 & 5 for example), would in my opinion become a focal point of the view rather than a peripheral feature.
- 4.9 I consider that the Proposals would result in significant adverse visual effects, both immediately and, notwithstanding the mitigation proposed, for a considerable period thereafter, on a substantial number of highly sensitive visual receptors using the public rights of way and roads which surround the Site, including the Wysis Way and the wider Ross Round and living locally.

### **Conclusions**

- 4.10 The submitted LVIA does not, in a number of material respects, meet the standard required of a Landscape and Visual Impact Assessment prepared in accordance with GLVIA3. It omits a Zone of Theoretical Visibility, winter photography, photomontage or verified visualisation, and an evidenced cumulative effects assessment, and does not state a threshold for significance; and, through Section 5, it performs a judgement on the ability of the Site to accommodate development, which is not the proper function of an LVIA, and which is more appropriately a matter for the decision-maker.
- 4.11 Notwithstanding these shortcomings, where the LVIA's own evidence and methodology are read carefully and applied consistently, they support rather than rebut the conclusion that the Proposals would result in significant adverse effects: on the character of the Site itself, assessed by the LVIA as Substantial Adverse; on the local landscape setting of Mitcheldean, once its own matrix is applied consistently; and on the visual amenity of a majority of the receptors it assesses.
- 4.12 The Site is not, in my opinion, simply an extension of the existing settlement edge. It retains a distinct rural character and a clear sense of separation from the settlement, reinforced by its domed landform, its lack of containment by rising land to the north, and its legibility as part of the wider field network which extends along the valley floor.
- 4.13 For these reasons, I conclude that the Proposals would introduce a suburban form of development in this rural location, on land which functions as part of the open countryside, and that they would result in an unacceptable adverse impact on the character and appearance of the area. I therefore support Reasons for Refusal 2 insofar as they relate to landscape and visual matters.

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# **Landscape Appeal Statement - Appendices**

**on behalf of the  
Forest of Dean Council**

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**Land North of Carisbrook  
Road, Mitcheldean.**

**Called in Application:  
P0672/25/OUT**

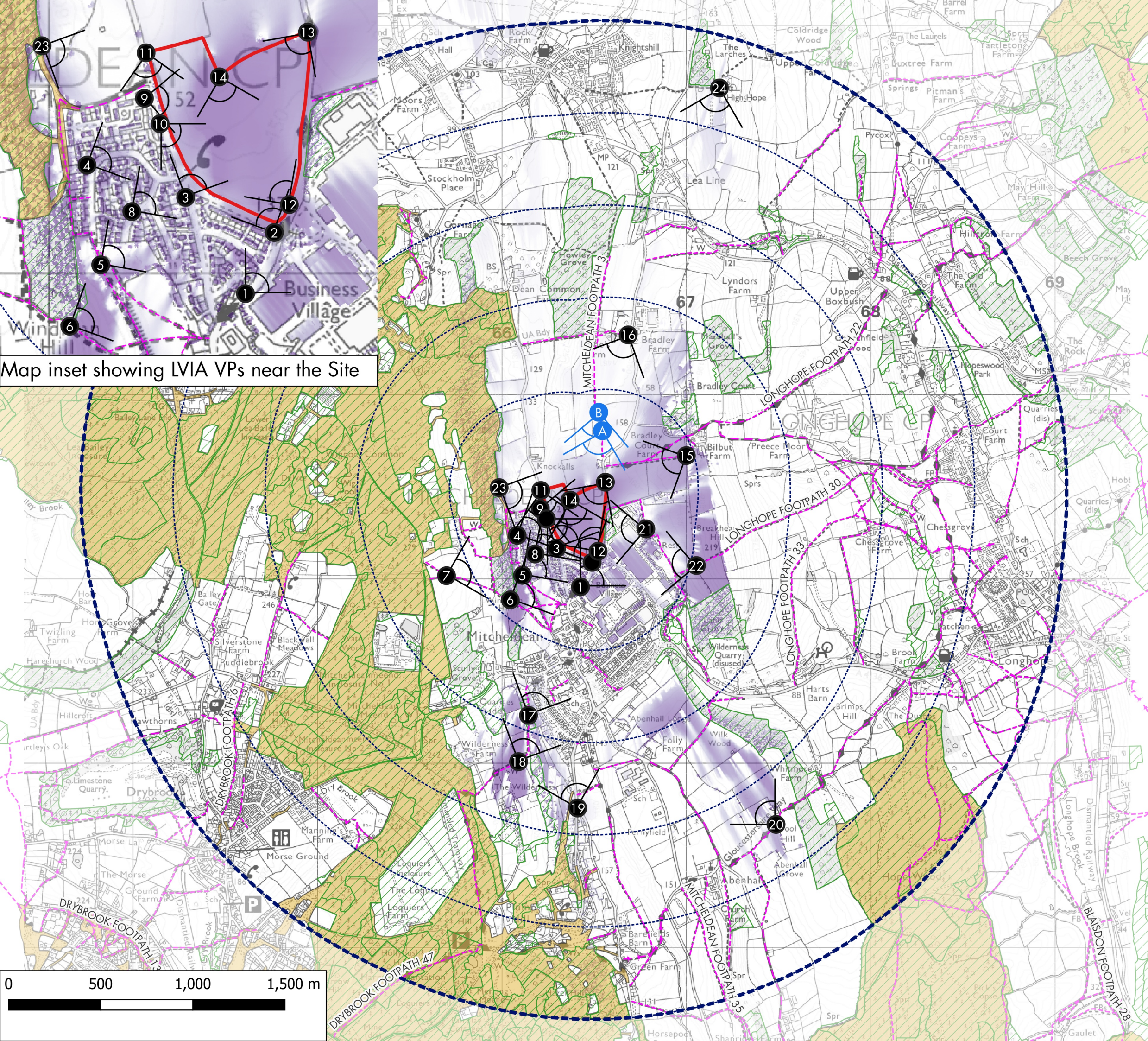
**September 2026  
INF\_PN260163**

## **Appendices**

|            |                                                          |
|------------|----------------------------------------------------------|
| Appendix 1 | ZTV and viewpoints                                       |
| Appendix 2 | Additional views                                         |
| Appendix 3 | Comparison of CSA and Influence judgements- disagreement |

## **Appendix 2**

### Additional views



Map inset showing LVIA VPs near the Site

Legend

- Site Boundary
- 500m buffers
- Extent of Study Area 2.5km
- Gloucestershire PRoW
  - Bridleway
  - Footpath
  - Restricted Byway
- Woodland
- CRoW Access Land
- CSA Environmental LVIA viewpoints
- Additional Viewpoints
- Zone of Theoretical Visibility (Modelled at 9m ridge height)
  - Not Theoretically Visible
  - Theoretically Visible

The ZTV illustrates the potential visibility of the proposed development based on digital surface modelling data. Therefore this takes into account objects that may occur in the landscape, such as woodland or buildings which may affect lines of sight.

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PROJECT  
Land at Carisbrook Road

CLIENT  
Forest of Dean District Council

TITLE  
ZTV and Viewpoint Locations Plan

|         |         |         |               |
|---------|---------|---------|---------------|
| STATUS  | INITIAL | DATE    | AUG 26        |
| SCALE   | NTS     | CHECKED | SB            |
| DRAWN   | SM      | REV NO: | ORIGINAL SIZE |
| JOB NO: | DWG NO: |         |               |
| N260163 | (08)001 |         | A3            |

## **Appendix 1**

### ZTV and viewpoints

APPROXIMATE EXTENT OF SITE



**VIEWPOINT A**  
Taken along PRoW MITCHELDEAN FOOTPATH 3  
looking south towards the Site.

|                           |                      |
|---------------------------|----------------------|
| Camera make & model       | - Iphone 13 Pro      |
| Lens make & focal length  | - Canon 50mm         |
| Date & time of photograph | - 31/08/2026 @ 13.10 |
| Eastings, Northings       | - 366548, 219754     |

|                          |             |
|--------------------------|-------------|
| Viewpoint height (AOD)   | - 1.56m     |
| Distance from site       | - 283m      |
| Projection-              | Planar      |
| Enlargement / Sheet Size | - 100% @ A3 |

|                             |                         |
|-----------------------------|-------------------------|
| Visualisation Type          | - Type 1                |
| Horizontal Field of View    | - 39.6°                 |
| Height of camera AGL        | - 1.5m                  |
| Page size / Image size (mm) | - 420 x 297 / 390 x 260 |

Project: N260163  
Client: Forest of Dean District Council



TO BE VIEWED AT A COMFORTABLE ARM'S LENGTH  
READ IN CONJUNCTION WITH THE N260163(08)001 ZTV and VIEWPOINT LOCATION PLAN



**VIEWPOINT B**  
Taken along PRoW MITCHELDEAN FOOTPATH 3  
looking south towards the Site.

|                           |                      |
|---------------------------|----------------------|
| Camera make & model       | - Iphone 13 Pro      |
| Lens make & focal length  | - Canon 50mm         |
| Date & time of photograph | - 31/08/2026 @ 13.15 |
| Eastings, Northings       | - 366522, 219918     |

|                          |             |
|--------------------------|-------------|
| Viewpoint height (AOD)   | - 151m      |
| Distance from site       | - 398m      |
| Projection-              | Planar      |
| Enlargement / Sheet Size | - 100% @ A3 |

|                             |                         |
|-----------------------------|-------------------------|
| Visualisation Type          | - Type 1                |
| Horizontal Field of View    | - 39.6°                 |
| Height of camera AGL        | - 1.5m                  |
| Page size / Image size (mm) | - 420 x 297 / 390 x 260 |

Project: N260163  
Client: Forest of Dean District Council

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## **Appendix 3**

### Comparison of CSA and Influence judgements- disagreement

Table 1: Comparison between CSA & INF Visual Receptors

| Receptor                                                                                            | Sensitivity CSA | Sensitivity INF | Magnitude of Change CSA | Magnitude of Change INF                                                                                                                                                       | Significance of Effect Year 1 CSA | Significance of Effect Year 1 INF                                                                                                                                                            | Significance of Effect Year 10 CSA | Significance of Effect Year 10 INF                                                                                                                                                                                                                                                              | Nature of Effect CSA | Nature of Effect INF |
|-----------------------------------------------------------------------------------------------------|-----------------|-----------------|-------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|----------------------|
| Views from tracks within Lining Wood VP23)                                                          | High            | High            | Slight and Moderate     | Substantial Moderate<br><br>With reference to the methodology, this is a high sensitivity receptor who can tolerate less degree of change to amount to a more adverse effect. | Slight and Moderate               | Substantial<br><br>Where visible the Proposals will extend into the countryside and appear as an elongated, development on high ground, incongruous in the view.                             | Slight                             | Moderate<br><br>Despite planting and mitigation, where views are available, especially in the winter months, the elevated nature of the receptor, the topography of the Site and the extent of development on the Site, the Proposals will remain as a readily descendible element in the view. | Adverse              | Adverse              |
| Views from public footpath which crosses open space on lower slopes of Windman Hill (CSA VP05 & 06) | High            | High            | Moderate                | Substantial Moderate<br><br>With reference to the methodology, this is a high sensitivity receptor who can tolerate less degree of change to amount to a                      | Moderate                          | Substantial<br><br>Development will be clearly visible and despite being adjacent to existing built form, will extend the settlement edge onto the higher ground, reducing the experience of | Moderate                           | Substantial Moderate<br><br>The Proposals will remain a prominent part of the view even when the mitigation planting matures due to the elevated nature of the receptor.                                                                                                                        | Adverse              | Adverse              |

Table 1: Comparison between CSA & INF Visual Receptors

|                                                                            |      |      |          |                      |          |                                                                                                                                                                                                                                                                                            |                 |                                                                                                                                                                                                                                     |         |         |
|----------------------------------------------------------------------------|------|------|----------|----------------------|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|---------|
|                                                                            |      |      |          | more adverse effect. |          | the wider countryside for these receptors and increasing the suburban form in the view. There will be a loss of openness, and built form will become the dominant feature of the view                                                                                                      |                 |                                                                                                                                                                                                                                     |         |         |
| View from Wysis Way and Footpath in the vicinity of Bilbut Farm (CSA VP15) | High | High | Moderate | Moderate             | Moderate | Substantial<br><br>The development will appear prominent in the view, due to the topography of the Site and the lack of existing mitigation. Largely the settlement is screened, and the visible existing residential area is assimilated into the edge of the lower slopes of the valley. | Moderate Slight | Moderate<br><br>The extent of the proposed development, the nature of the topography and the sensitivity of the receptors result in an effect that will remain a readily discernible element of the view, especially in the winter. | Adverse | Adverse |
| View from public footpaths on rising ground at Breckheart                  | High | High | Moderate | Moderate             | Moderate | Substantial<br><br>Similarly to the VP15. the development will appear                                                                                                                                                                                                                      | Moderate Slight | Moderate<br><br>The extent of the proposed development, the nature of the                                                                                                                                                           | Adverse | Adverse |

Table 1: Comparison between CSA & INF Visual Receptors

|                                                                    |      |      |          |                                                                                                                                                                                                                                                   |          |                                                                                                                                                                                                                                                                                                                                     |          |                                                                                                                                                                                                 |         |         |
|--------------------------------------------------------------------|------|------|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|---------|
| Hill (CSA VP21 & 22)                                               |      |      |          |                                                                                                                                                                                                                                                   |          | prominent in the view, due to the topography of the Site and the elevated location of the receptor. The development will extend and elongate the settlements residential edge across the view as a dominant part of the view. The visible existing residential area is assimilated into the edge of the lower slopes of the valley. |          | topography and the sensitivity of the receptors result in an effect that will remain a readily discernible element of the view, especially in the winter.                                       |         |         |
| Views from the Wysis Way southwest of Mitcheldean (CSA VP 17 & 18) | High | High | Moderate | Substantial<br>Moderate<br><br>Receptors on the higher ground to the west experience views of the wider countryside and often more limited views of the settlement. The Proposals will appear to rise up and away from the settlement, beyond the | Moderate | Substantial<br><br>From the receptors on the higher ground, who have a high sensitivity to change, the Proposals will represent a substantial change.                                                                                                                                                                               | Moderate | Substantial<br>Moderate<br><br>Due to the elevated nature of the receptors and the topography on Site the Proposals will remain a readily discernible element, with mitigation, even in Winter. | Adverse | Adverse |

Table 1: Comparison between CSA & INF Visual Receptors

|                                                                      |              |      |              |                                                                                                                                                                                             |              |                                                                                                                                                                                                                 |              |                                                                                                                                                                                                       |              |         |
|----------------------------------------------------------------------|--------------|------|--------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|---------|
|                                                                      |              |      |              | existing extents to the east and, whereas the existing settlement can appear bedded down in the valley, the Proposals will appear prominent and introducing built form into the mid ground. |              |                                                                                                                                                                                                                 |              |                                                                                                                                                                                                       |              |         |
| Views at the northern extent of the Site on the Wysis Way (CSA VP13) | Not assessed | High | Not assessed | Substantial<br><br>There will be a complete loss of views towards the settlement and the high ground to the southwest. Built form will dominate the view                                    | Not assessed | Substantial<br><br>Mitigation will filter views of the proposed dwellings, but the development will result in a permanent, irreversible change to the view and experience for these high sensitivity receptors. | Not assessed | Substantial<br>Moderate<br><br>The change at Year 1 remains, some maturity in the planting will further mitigate the views of the houses but will still result in the fundamental change to the view. | Not assessed | Adverse |
| <b>Influence Additional View</b>                                     |              |      |              |                                                                                                                                                                                             |              |                                                                                                                                                                                                                 |              |                                                                                                                                                                                                       |              |         |
| View from PRoW Mitcheldean Footpath 3 (INF VPOA & B)                 |              | High |              | Slight<br><br>There will be a loss of interconnecting views to the landscape                                                                                                                |              | Moderate<br><br>At year one, it is likely that rooflines will be visible on this approach before                                                                                                                |              | Moderate Slight<br><br>Once the planting matures on the northern site boundary, there will be no                                                                                                      |              |         |

Table 1: Comparison between CSA & INF Visual Receptors

|  |  |  |  |                                                                                                                            |  |                                                                                                                                                                                           |  |                                                                                                                                          |  |  |
|--|--|--|--|----------------------------------------------------------------------------------------------------------------------------|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|------------------------------------------------------------------------------------------------------------------------------------------|--|--|
|  |  |  |  | above Mitcheldean and the distinct tree will be blended into a new backdrop of rooflines and ultimately a vegetated buffer |  | the mitigation boundary planting matures. The character of the view will alter from open landscape with ridgeline backdrop and individual trees to a continuous wooded extent to the view |  | views of the built development however the view will be more enclosed and there will be a loss connecting views to the landscape beyond. |  |  |
|--|--|--|--|----------------------------------------------------------------------------------------------------------------------------|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|------------------------------------------------------------------------------------------------------------------------------------------|--|--|

No significance of effect table has been submitted in the LVIA and therefore to support my judgements I have adapted our table to the below.

| Magnitude of Effect | Description of Significance of Effect |             |             |
|---------------------|---------------------------------------|-------------|-------------|
| Substantial         | Moderate                              | Substantial | Substantial |
| Moderate            | Slight                                | Moderate    | Substantial |
| Slight              | Slight                                | Slight      | Moderate    |
| Negligible          | Negligible                            | Negligible  | Negligible  |
|                     | Low                                   | Medium      | High        |
|                     | Receptor Sensitivity                  |             |             |

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