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## HDA response to Landscape Issue Paper

### 1 Introduction

- 1.1 In January 2018 FPCR Environment & Design Ltd submitted a 'Landscape Issue Paper' as a consultation response to 'The Cranbrook Plan: Preferred Approach 2017 Development Plan Document'. Section 3 of the 'Landscape Issue Paper' includes a critique of the Landscape and Visual Appraisal (LVA) evidence, produced by HDA. This document consists of HDA's response to the FPCR critique.
- 1.2 Part of the critique (paragraph 3.9) involved comments on information deemed to be missing from the HDA supporting photomontages. HDA have now revised this document to include information on:
- The height that the photographs were taken from (within the methodology);
  - The date that each photograph was taken;
  - A six figure grid reference to provide additional detail with respect to photograph locations; and
  - Measurements from each viewpoint location to a mapped area within the wireframes (identified on the photolocation plans).
- 1.3 Point vi) of paragraph 3.9 states that '*Photomontage Viewpoint 5 that looks towards Cranbrook South does not appear to have been taken from the Public Footpath*'. This assumption is incorrect, the viewpoint location is taken from footpath R1, between London Road and Rockbeare.

### 2 HDA Response

- 2.1 The vast majority of the FPCR critique focusses on the HDA supporting photomontages. Despite the accompanying text within the photomontage document, the purpose of the wireframe montages has been misinterpreted. The wireframe photomontages were used as part of the iterative process of masterplanning, in order

to provide recommendations on parcels of land that had the highest and lowest potential visual impacts. This information was then used by the masterplanners at Savills, to inform decisions about appropriate locations for development. The wireframe photomontages were not designed to be used as an assessment tool for the LVA, however they were helpful in making judgements.

- 2.1 In order to improve the ease of comparison between potential development parcels, bright colours were used. These were assumed to represent a worst case scenario, rather than a realistic representation of housing.
- 2.2 The Landscape Institutes 'Guidelines for Landscape and Visual Impact Assessment (GLVIA – Third edition 2013) contains guidance on the production of photomontages. Paragraph 8.22 (p145) states that:  
*'rendering of the photomontages should in general be as photorealistic as possible, but: for large-scale urban developments, block models are often used... ...although not photorealistic these can still be useful in representing the change to the view;'*
- 2.3 HDA considers that the high-level and large scale nature of the proposals, combined with the requirement to test a number of different scenarios, meant that wireframes were the most suitable visual aid for the intended purpose.
- 2.4 Paragraph 3.11 of the FPCR report criticises the lack of mitigation shown on the wireframes. This is due to the intended use of the wireframes for direct comparison of potential development areas as set out above. They look at the potential impacts at construction and deliberately show a worst case scenario. This illustrates the process of Primary mitigation as set out in GLVIA paragraph 4.1, which describes primary mitigation as the iterative process of design.
- 2.5 The mitigation hierarchy is set out as follows:
  1. Primary measures – the iterative process of design
  2. Standard measures for avoiding and reducing environmental effects
  3. Secondary measures designed to address residual adverse effects.

2.6 GLVIA paragraph 4.24 states that

*'The ideal strategy is one of prevention / avoidance.'*

Followed by paragraph 4.25, which states that:

*'This may be achieved by the selection of a site that can more readily accommodate the proposed development or through innovative design within the selected site.'*

This is the principle that HDA were working from in support of the 'The Cranbrook Plan: Preferred Approach 2017 Development Plan Document'. The brief was to make recommendations for a masterplan that would have the lowest predicted landscape and visual effects. The wireframe montages were a useful tool in allowing us to test our recommendations.

2.7 A further consideration is the existing character of the landscape. Cranbrook is surrounded by a fairly open landscape, with containment provided by hedgerows and hedgerow trees. Blocks of woodland are small and infrequent in the local area, with large areas of woodland being more common to the north. Orchards are a frequently occurring feature around Whimple, and could be introduced within the eastern parcel of the site without departure from existing character (see viewpoint 1). In contrast the hill within the southern parcel forms the skyline within local views. The introduction of large areas of woodland within this view would form a departure from existing landscape character. This concept is supported in GLVIA in paragraph 4.26:

*'measures that are simply added on to a scheme as 'cosmetic' landscape works, such as screen planting designed to reduce the negative effects of an otherwise fixed scheme design, are the least desirable'.*

2.8 The design process conducted by HDA was to focus on primary mitigation measures, to support the high-level masterplan, with the assumption that secondary measures for an appropriately located site would be more successful than for a site with higher impacts at construction. This acknowledges the time span required for structure planting to mature (>10 years) and seeks to minimise predicted effects from the outset. This approach resulted in the conclusions reached by the HDA visual appraisal, which found no residual Major or Substantial visual effects.

2.9 In contrast, the FPCR photomontages only consider their proposals after 15 years of establishment and have provided the council with no evidence of what their proposals for the Cranbrook Expansion would look like at construction, when the greatest effects of the development are likely to occur.

2.10 With regards to the comments on the HDA supporting photographs (paragraph 3.14), we have differentiated between the 'In-site photolocations' (preceded by the parcel letter) and the 'visibility photolocation' which have a number as a reference. Within the visual baseline table (Appendix 3 of the report), the representative photographs have been identified for each visual receptor group. The photographs taken from within the site are useful for reference to landscape character and to determine reverse views from properties.

### **3 HDA comments on the revised proposals**

#### Cranbrook South

3.1 HDA have considered paragraphs 4.1 – 4.14 of the Landscape Issue Paper in conjunction with supporting Figures 1-10. Within the Landscape Principles Plan (Figure 8-9), the proposed development edge sits on the ridgeline of the southern parcel. The proposed development to the south of Parsons Lane would be visible at construction from all of the viewpoint locations represented in both the sections and photomontages submitted. When viewed from the east, this would visibly extend the settlement edge of Cranbrook into a landscape that is currently wholly rural. The proposed housing would skyline within these views until the establishment of the mitigation planting, which is likely to take a minimum of 10 years – particularly as the proposed mitigation planting is at a lower level than the proposed housing (see paras 2.6 and 2.7 on mitigation). The proposed orchards are unlikely to fulfil a screening function as Orchard trees typically do not grow higher than 10m. There are likely to be residual views of the rooftops of the proposed development over the top of the proposed orchards.

3.2 The mitigation planting shown on the Landscape Principles Plan is not representative of the local landscape. The Cranbrook Plan Area lies within character area Clyst

Lowland Farmlands of the 2015 Devon Landscape Character Assessment. One of the characteristics relevant to this character area is:

- *‘Generally well treed appearance due to significant numbers of hedgerow trees although few woodlands with exception of Killerton Estate (part of Ashclyst Forest).’*

3.3 Relevant key characteristics of the southern parcel, taken from the baseline section of the HDA LVA (Paragraph 4.3.10), include:

- Tree cover is limited to hedgerow trees and two small copses to the east of the site. An avenue of trees lines the access road to Treasbeare Farmhouse.
- The break in slope defined by the local ridge to the north-east of Treasbeare Farm demarcates a change in the perceptual aspects of the parcel. To the west of the ridge, the ground slopes towards Exeter Airport to the south, new development at Skypark to the west and Cranbrook to the north, all of which combine to give an urban and developed setting to the parcel. The noise from the airport also adversely affects the tranquillity of this part of the site. In contrast, the high ground reduces the noise experienced to the east and the outlook is wholly rural, with a high scenic quality. Within the parcel, the only settlement is Treasbeare Farm and cottages.
- This is a large scale landscape, which feels open and exposed, particularly on high ground. From the local ridge, long views are possible over the surrounding lowland landscapes to distant hills.

3.4 The proposals within the Landscape Principles Plan, seek to introduce development into the eastern part of the southern parcel. This part of the site has a strong relationship with the wider landscape, is substantially rural and forms part of the wider setting to Rockbeare. The hill within the southern site is a distinctive feature with its open skyline, which forms part of the open fieldscape typical of the area. The character of the hill would be irrevocably changed by the submitted proposals.

- 3.5 The proposed landscape design introduces large areas of large organic shaped woodland planting, designed to screen a visually prominent development. These proposals does not sit comfortably with existing landscape character and are designed to screen the development rather than to reflect and enhance existing landscape character. This contradicts the guidance within paragraph 4.26 of GLVIA, as set out within paragraph 2.7 of this report. The landscape proposals would include substantial amounts of planting, which would be deleterious in its own right.
- 3.6 The proposed orchard planting is characteristic of the area, however would be insufficient as a screen for the proposed development.
- 3.7 The proposed SuDS features are likely to be visible and incongruous at construction, due to their location on steeply sloping hillsides. The proposed earthworks required to construct these ponds has not been included on the landscape principles plan, nor have the ponds been identified within the photomontages or sections.
- 3.8 It is our opinion that section lines have been deliberately chosen to show parts of the site with the lowest potential impacts. No attempt has been made to illustrate (either within the sections or the photomontages) the predicted effects at construction, prior to the establishment of the mitigation planting. It is at construction that the most significant landscape and visual effects would be experienced.
- 3.9 The broad principles of mitigation for the Cranbrook South (Issue Paper paragraph 4.18) are an improvement on the original application. The development should be set as far back as possible from the east, preferably to the west of the local ridge (40m AOD contour) to avoid significant visual impacts. Lower building heights on the high ground would also be advocated. Advance planting would be required, as suggested if development were to extend to the east of the local ridgeline.
- 3.10 It is recommended that any proposals for mitigation planting are altered to be more in keeping with local landscape character, which includes native hedgerows with hedgerow trees, individual parkland trees, orchards and occasional small copses of

rectilinear woodland. Where possible, the open nature of the landscape should be maintained.

### Cranbrook East

- 3.10 Paragraphs 4.15 and 4.16 of the Landscape Issue Paper consider additional development within the eastern parcel. This parcel can be split into two distinct areas:
- I. the majority of the site includes small to medium fields, some with medieval field patterns, and a riparian character along the stream corridor.
  - II. The north-eastern field, which has fewer features but is part of the setting to Wimple.
- 3.11 The character and sensitivity of this parcel (paragraph 4.3.9) is described as:
- 'The parcel is typical of the character area and contains many of the special qualities and landscape features set out within the county and district LCA. The stream corridors and small medieval fields in the centre and east of the parcel have a **High** sensitivity to potential development. The more regular fields to the south and west of the site have been assessed as having **Medium** sensitivity to development. This sensitivity is closely linked to sensitive features, identified on plan HDA 8 (the stream corridors, primary corridors and category A trees) which should be retained. The north-eastern field has a strong relationship with the wider landscape, but contains few landscape features. This field has been assessed as having **Medium** landscape sensitivity to development.'*
- 3.12 The proposals have respected the visual sensitivity of the north-eastern field, through its retention in agricultural use, but have not respected the landscape sensitivity of the small fields of medieval origin within the parcel. These fields would be lost to development and while many of the boundary features would be retained, the proposed planting would mean that the distinctive field pattern would also be lost, resulting in significant adverse landscape impacts.
- 3.13 The proposed settlement pattern is disparate and appears to be developed around perceived constraints, rather than responding to opportunities within the site. Open

space is relegated to the floodplain and under existing power lines, which would not meet Natural England's SANG criteria. The Landscape Principles Plan shows no footpath connections into the wider landscape. A pedestrian / cycle connection to Wimple would be desirable.

- 3.14 The additional eastern expansion of the proposed housing within the parcel, extends the proposed settlement edge of Cranbrook, increasing the linear nature of the settlement pattern. The proposed mitigation shown within the Landscape Principles Plan is more in keeping with the existing landscape character than shown for the southern parcel, and the high level of feature retention is positive, however the connectivity between retained features is poor. There is the opportunity to use existing features to create stronger north-south green corridors, which has not been taken up within these proposals. The sinuous woodland edges to the west and south-west of the north-eastern hill are not characteristic and would form a marked contrast to the open and featureless character of the hill. It would be an advantage if the north-eastern hill could be included within the landscape proposals as there are many opportunities for landscape enhancement.
- 3.15 The complete loss of the historic field pattern as a result of the proposed development would be an adverse landscape impact. The remaining broad principles of mitigation for Cranbrook East (Issue Paper paragraph 4.23) are sound, with the exception of development within all of the medieval fields. The complete loss of the historic field pattern as a result of the proposed development would be an adverse landscape impact.