

INTRODUCTION

This report forms the EDDC's landscape response to the revised and additional information submitted in support of the outline planning application (with all matters reserved except access) for the development of up to 22,800sqm of floor space for use classes B1 (Office Light Industry), B2 (General Industry) and B8 (Storage and Distribution) with details of, and associated strategic landscaping for, the access, linking cycleway and footway, and flood improvements/attenuation – nr. 16/0669/MOUT.

As part of the planning application process the applicant, Fords of Sidmouth, submitted revisions of the following landscape related information:

- a Landscape and Visual Impact Assessment,
- revised drainage information, and
- an Illustrative Masterplan;

and provided a design code to address previously raised landscape character and visual impact concerns.

This report includes reviews of this landscape related information and how it responds to the site and to the other technical information. The reviews should be read in conjunction with the submitted revised information and are followed by a recommendation outlining the reasons for the recommendation based upon adopted policy, guidance and professional judgment.

REVIEW OF THE LANDSCAPE AND VISUAL IMPACT ASSESSMENT

LVIA Methodology Comments

1. The previously raised comments in relation to paragraph 2.2.6 still stand although it has been noted a design code has been submitted addressing some aspects of GI.

Previously raised comment: The wider green network and any landscape features (SuDS, woodland, tree planting, etc...) within the proposed development should also be considered green infrastructure as per the definition set out in NPPG Natural Environment paragraph 027. Green infrastructure should form a key component of sustainable development according to NPPG Natural Environment paragraph 028. Due to the aforementioned GI should form a key component of delivering the requirements set out in strategy 26 – Development at Sidmouth:

'Furthermore, the employment site must be subject to the highest design and landscaping standards with extensive planting and wide buffers around existing homes to minimise any amenity impacts...'

Why was the provision of new PRoWs or public open space rejected? The flood risk mitigation area and woodland could be designed to provide access creating additional public benefits and assist in delivering a multi-functional Green infrastructure for the site and its wider context.

LVIA Comments

The following policy and guidance context comments still require addressing:

1. Paragraph 7.2.8 – should also include the following site applicable East Devon AONB Management Strategy 2014 – 2019 Policy:

P 1 - Encourage the development of guidelines and design guides to support high quality sustainable development which complements and respects the AONB landscape and historic character.

2. Local Policy section (paragraphs 7.2.12 – 7.2.17) should have also considered the following EDDC

Local Plan Policies:

- Strategy 3 – Sustainable Development
- Strategy 5 – Environment
- Policy D3 - Trees and Development Sites

And should have included Strategy 46 in full as the missing paragraph sets out guidelines for the design of the site.

The following comments on the LVIA methodology still need to be addressed:

1. Paragraph 7.3.8 – As stated above in the comments on the LVIA methodology the definition of green infrastructure as applied within the LVIA does not adhere to the definition set out in NPPG Natural environment paragraph 027 or the Landscape institute’s definition. The provision of GI should have considered the inclusion of SuDS features, landscaped drainage improvements, proposed tree planting, etc.... By not considering the site’s current and potential GI within the LVIA, the report fails to fully acknowledge the landscape as a resource and the potential for mitigation and enhancement.
2. Paragraph 7.3.9 – The LVIA should indicate how it assisted in the development of the design code and indicate in its assessment how the design code’s guidelines assist in reducing any adverse impacts.

The following study area landscape character baseline comments still require to be addressed:

1. Paragraph 7.4.3 – the following NCA 147: Blackdowns key characteristics are also applicable to the site:
 - *A landscape drained by small streams radiating out from the ridges into rivers with relatively short courses south to the sea. Springs emerge from the interface of the Greensand and clays.*
 - *An area offering opportunities to experience tranquillity, outstanding natural beauty in three designated Areas of Outstanding Natural Beauty (AONBs) and recreation, particularly along the South West Coast Path National Trail and the East Devon Way regional route.*
2. Paragraph 7.4.5 – should have also included the following key characteristics of the East Devon Central Ridge:
 - *Landscape crossed by streams and springs draining into the adjacent steeply incised wooded valleys.*
 - *Regular modern and Parliamentary fields of large and medium scale on the ridges, reflecting late enclosure of common land (e.g. Stockland Hill), contrasting with smaller curving fields of medieval origin on valley slopes.*
 - *Low narrow earthbanks with hedges on the ridgetop, with wider historic banks in the upper farmed valleys and more species-diverse Devon hedges (e.g. beech, sycamore, ash, hazel and gorse) with flower, fern and moss-rich banks on lower slopes.*
 - *Mainly pasture (often improved) and dairy farming with some mixed farming on heavy brown soils.*
3. Paragraph 7.4.6 – Should have included the following additional site applicable management guidelines:

- *Protect traditional building styles and materials, particularly local chert with red brick detailing, utilising the same styles and materials in new development wherever possible (whilst seeking to incorporate sustainable design).*
 - *Protect the landscape's network of quiet lanes enclosed by woodland and species-rich hedgebanks, resisting unsympathetic highways improvements or signage.*
4. Paragraph 7.4.8 – should have included the following additional site applicable management guidelines for LCT 4A:
- *Boundaries: conserve and restore by:*
 - 2) *Encouraging the appropriate management of ditches by infrequent or rotational management as required to conserve rare plants and insects.*
 - 3) *Discouraging any further enclosure of floodplains, except temporary fencing for biodiversity conservation.*

The following site landscape character baseline and setting comments still apply:

1. Paragraph 7.4.10 – The site also forms the gateway into Sidford and Sidmouth from the north, especially for people travelling south from the Honiton direction.
2. Paragraph 7.4.15 – It is understood a Heritage Statement has been submitted, however aspects such as intervisibility between conservation area and listed buildings with the site and the impact on their setting should have been mentioned within the LVIA.
3. Paragraph 7.4.23 – references the wrong figure. The other route with public access is a DCC public footway named Laundry Lane.

The following visual baseline comments need to be addressed within the LVIA:

1. Paragraphs 7.4.32-7.4.37 – The additional agreed views have not been considered within the *Key views and viewpoints* and *Value of Views* sections. To ensure the robustness of the assessment these views should have been considered properly. The visual envelope of the site should be considered to be larger than presented in the LVIA and although still local in scale its importance in fulfilling a gateway function for Sidford and Sidmouth should not be underestimated. The additional view from Buckley Road should be considered high value due to its location within the AONB and its relationship to PRoW network. It forms a representative viewpoint for the users of the narrow lanes in the lower part of the valley which link into the wider network of PRoW's. The additional view from the A3052 should be considered high value due to its location within the AONB and its gateway function.

The following potential effects comments still need to be considered:

1. Paragraph 7.5.2 – the site's topography should be listed as a landscape feature which will be potentially affected by the proposed development. The creation of the flood attenuation features will change certain sections of the topography dramatically.

The following comments on the mitigation and enhancement section of the LVIA need to be addressed through an update of the landscape strategy and consideration of the design code and how it will assist in delivering the predicted outcomes of the development or even further reduce its adverse effects:

1. Paragraph 7.6.3 – should reference the submitted design code.

2. Paragraphs 7.6.5-7.6.7 – The landscape strategy is very limited and does not explain how the provided landscape elements will respond to the visual envelope or the local landscape character of the site except for the proposed off-site woodland planting which will only address views from the north. Further elements which should have been included in the landscape strategy:
 - The SuDS features and their landscape design and integration within the scheme (not only the currently proposed measure, but also additional measures such as green roofs, bio-retention areas, rain gardens, swales, etc...)
 - How the proposed tree planting will address views and what language it will take

The below comments provide EDDC's landscape officer assessment of the impact on the landscape character based on the current provided design information. This assessment could change by providing additional and revised information in the design code addressing the comments outlined below in the *Review of the Design Code* and the landscape strategy as provided in the LVIA:

1. Paragraph 7.7.13-7.7.16 & Appendix B7 - Landscape effects table – the effect on LCT 4A: Unsettled Valley Floors should have been considered moderate to major adverse. The LVIA assessment undervalues the magnitude of change which will be caused by the proposed development. The engineered re-profiling of the valley floor of the river Sid (including the unnamed stream) which should be considered a further enclosure of the valley floor, which is in direct conflict with the LCT's management guidelines. Overall the development will have an urbanizing influence on a key section of the LCT; therefore the magnitude of change should be considered moderate to slight adverse leading to an effect of direct moderate to major adverse significance. Further mitigation measures and adjustments to the design could be introduced to further reduce the impact of the likely effects (see *Review of Design Code* for detailed comments and suggestions).
2. Paragraph 7.7.18 & Appendix B7 - Landscape effects table - effect on the site's landform – the construction phase effect should have been considered of direct, short-term moderate to major adverse significance. The proposed development includes some unnatural level changes to a section of the Sid valley (including the unnamed stream) which should have been considered a further enclosure of the valley floor. Further the shape of one of the proposed attenuation ponds and the constant slopes of the banks and embankments of the proposed SuDS features and storm water alleviation appear highly engineered and do not take account of the latest CIRIA guidance. Due to the aforementioned and the associated construction phase disturbance the magnitude of change should have been considered direct, short-term moderate to major adverse. A more considered design of the attenuation features, further exploration of other SuDS features and development of design parameters within the design coded could assist in reducing its impact. Appendix B7 - Landscape effects table - effect on the site's woodland, trees and hedgerows – the construction phase effect should have been considered of direct, short-term moderate adverse significance. The proposed highway improvements will result in partial loss of the western hedgerow, of which certain sections will only be replaced at the end of the construction works; therefore the magnitude of change at construction should have been considered direct, short-term moderate adverse. The impact could be reduced by implementing the off-site woodland planting in

advance of the road improvements and by incorporating some larger tree stock within the proposed planting to provide a level of instant screening and age variety.

3. Paragraph 7.7.19 & Appendix B7 - Landscape effects table - effect on the site's landform – the effect at completion and after 15 years of planting should have been considered of direct, long term moderate adverse significance. The shape of one of the proposed attenuation ponds and the constant slopes of the banks and embankments of the proposed SuDS features and storm water alleviation appear highly engineered and do not take account of the latest CIRIA guidance. Due to the aforementioned the magnitude of change should have been considered direct, long term moderate to minor adverse. A more considered design of the attenuation features and further exploration of other SuDS features could assist in further reducing its impact.

Appendix B7 - Landscape effects table - effect on the site's woodland, trees and hedgerows – the effect at completion should have been considered of direct, long-term moderate adverse significance, because the implemented mitigation measures have yet to mature and additional mitigation measure could be included to address the better impacts. The impact could be further reduced by incorporating some larger tree stock within the proposed woodland planting to provide a level of instant screening and age variety and by incorporating the comments raised in the *Comments on the Design Code* section of this report. After 15 years of planting the mitigation measure will start to mature but additional measures could have been included (see *Review of the Design Code*), therefore the effect should still be considered of long-term moderate to minor adverse significance.

The below comments provide EDDC's landscape officer assessment of the visual impact of the development on the study area based on the current provided design information. This assessment could change by providing additional and revised information in the design code addressing the comments outlined below in the *Review of the Design Code* and by updating the landscape strategy provided in the LVIA:

1. Paragraphs 7.7.25-7.7.29 and Appendix B7 – The LVIA underrates the susceptibility of several visual receptors:
 - The susceptibility of the users of Two Bridges Road as represented by viewpoint 4 should have been rated medium to high due to the proximity of the receptors to the site, the views it offers of the AONB (which would be blocked by the proposed development) and its role in shaping the entry into Sidford. (check text, as ratings vary between LVIA text and table)
 - The susceptibility of the users of Ottery Lane as represented by viewpoint 6 should have been rated high as the viewpoint currently offers a relatively unspoilt rural view of the AONB from a characteristic Devon rural lane, which connects into the wider network of PRoWs and the proposed development would insert urban elements into this view.
2. Paragraphs 7.7.30-31 and Appendix B7 – Currently the table does not accurately reflect the sensitivity based on the value and the susceptibility of the views. Also due to the above comments in relation to the susceptibility of the receptors the sensitivity of the following receptors should be revised/reviewed to the following:

- Viewpoint 4 – Sensitivity should have been rated high (check susceptibility rating)
 - Viewpoint 5 - Sensitivity should have been rated medium
 - Viewpoint 6 – Sensitivity should have been rated high (check susceptibility rating)
3. Paragraphs 7.7.33 & 7.7.36 – 55 – The text should have considered the agreed additional viewpoints, currently they are not discussed within the report.

LVIA Conclusion Comments

The below comments could be addressed by a revised landscape strategy and an expanded and revised design code:

1. Paragraph 7.7.60 – The LVIA underrates the susceptibility of various visual receptors as the report fails to take account of the site’s contribution in shaping the arrival sequence into Sidford. Only a limited number of mitigation measures are identified (Comments on the proposed mitigation measures can be found in the *Review of the Design code*).
2. Paragraph 7.7.60 – Although the impact of the development is relatively local; however impacts on the site’s landform and the Sid Valley (including the unnamed stream) are of moderate significance and impacts on woodland, trees and hedgerows are of moderate to minor significance. The proposed changes to this local area do affect the Landscape Character type and the East Devon AONB and could be mitigated better through more considered landscape proposals (see *Review of the Design Code*).
3. Paragraphs 7.7.61-62 – Although a design code has been submitted there are still concerns about the provision of appropriate mitigation as the submitted design code fails to properly address:
 - views from the east and west,
 - design of SuDS features to integrate seamlessly into the existing landform,
 - the character of the suggested tree planting, and
 - explain why certain features are included and why others are not considered (e.g. why are green roofs and additional public access not considered?).

For further information see *Review of the Design code*.

Review of the Design Code

A well considered design code is needed to ensure the sensitive landscape setting of the site is appropriately addressed and the assessed outcomes as stated in the LVIA can be delivered. The design code should form the framework against which all current and future application will be assessed against. The current design code fails to provide this framework, due to the following reasons:

1. Within the various types of development insufficient space provision is included for landscaping. Generally the provision of car parking for the types of uses proposed exceeds the extent of the building footprint, therefore whenever 50% of the proposed development area will consist of building it raises question about the delivery of a high quality landscape framework due to the expected car park needs.

2. Why are green roofs not considered? They would deliver biodiversity, drainage, landscape and visual benefits.
3. Why is the provision of public access to the new proposed green spaces not considered? The provision of access would add another layer of multi-functionality to the proposed Green Infrastructure and would extend the benefits of the provided green spaces to the wider community.
4. The provision of SuDS should be incorporated within the design code through the provision of specific design codes accompanied by typical sections taking account of the best practice guidance set out in CIRIA's SuDS Manual C753 (2015), chapter 29 and DCC's draft SuDS Guidance.
5. Typical sections and indicative site layouts/diagrams are needed setting out the minimum and maximum dimension for the different road hierarchies including their associated landscape elements (e.g. tree planting, swale, etc.), car park approaches, the set back from Two Bridges Road including the cycle way, etc...
6. The selected dark colours (RAL 8025 & RAL 6010) are not usually associated with high standards of design. The use of other local materials should be considered, e.g. chert and brick (a dark coloured brick could be used to aid integration into the wider landscape setting).
7. The planting of trees along Two Bridges Road should not be carried out in regular 25m intervals as it is out of keeping with the wider countryside setting. The edges of the landscape framework should focus on tying into the wider rural countryside setting.
8. A typical species list for the different types of planting should be provided.
9. Further clarification needs to be provided about the function of the various planting types, e.g. the design code proposes tree planting at each junction, but what is the intention of this planting?

Review of the PDAS & Landscape Strategy

The below comments were raised in response to the previously submitted PDAS and Landscape Strategy and which weren't addressed by the additional and revised information submitted by the applicant:

1. The implementation of the highway access to the most northern field should only be allowed after the most southern field has been developed as per EDDC policy Strategy 26
2. The revised flood improvement and flood attenuation proposals start to address some of the previously raised concerns; however they still do not fully follow the SuDS management train as set out within DDC's draft Sustainable Drainage Guidance and CIRIA's SuDS Manual C753. The current scheme fails to acknowledge the potential of SuDS as a high value component of GI. Additional SuDS measures should have been considered in the design code (see *Review of the Design Code* above). The currently proposed flood and attenuation measures still appear to be designed as engineering features (rectangular shape, even grading of banks, etc.) rather than landscape features.
3. Public access should be provided to the southern flood improvement area and the northern off site proposed woodland planting to provide additional public benefits.
4. The proposed woodland planting should be planted on 2x2m matrix and should include standard trees. Approximately 6.25% of the proposed tree and shrub planting should be standard trees. This

will add age variety to the planting and instant screening of the development in views from the north. Due to the wet site conditions the woodland planting should include alder. Shrub planting should not be planted in 1.2m high shelters, but with 60cm high spiral guards. Amenity planting within flood improvement area next to laundry lane should take account of potential wet ground conditions. *Acer campestre* and *Malus sylvestris* are not suitable for these conditions; consider replacing with *Quercus robur*, *Betula pubescens*, *Alnus glutinosa*, *Sorbus aucuparia* and/or *Populus nigra* subsp *betulifolia*.

RECOMMENDATION

The revised LVIA has not considered the previously raised comments in relation to the policy, guidance and landscape character assessment context of the site. It still does not recognise the gateway function the site fulfils for Sidmouth and Sidford. The assessment of the agreed additional viewpoints should be incorporated within the overall report as it shows a greater visual envelope. The proposed primary mitigation measures as set out in the landscape strategy and the design code still insufficiently address the likely significant impacts of the proposed development on the landscape character and the visual amenity. The current judgements made within the LVIA about the potential impacts are not supported by a strong design code ensuring the delivery of the needed mitigation measures. The currently submitted design code provides insufficient information and does not set a high standard of design as required under EDDC Strategy 26. The proposed drainage proposals have improved but still do not fully address the previously raised landscape concerns and the SuDS management train approach as set out in DDC's draft Sustainable Drainage Guidance and CIRIA's SuDS Manual C753. The issues could be addressed by revised drainage proposals and the inclusion of SuDS design parameters in the design code.

Due to the aforementioned the scheme currently does not comply with the following policies:

- *Strategy 26 - Development at Sidmouth*
- *Strategy 46 - Landscape Conservation and Enhancement and AONBs*
- *Policy D1 - Design and Local Distinctiveness*
- *Policy D2 - Landscape Requirements*
- *Policy D3 - Trees and Development Sites*

Therefore the scheme is currently unacceptable in landscape terms.