

## MEMORANDUM

**To** : Internal Consultee

**From** : Mr Charles Potterton – Potterton Associates Ltd (Consultant Landscape Architect)

**Tel** : **My Ref** : 173774

**Date** : January 2018

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<b>SITE:</b>	Biddlestone Farm, Llangarron, Ross-On-Wye, Herefordshire, HR9 6NT
<b>APPLICATION TYPE:</b>	Planning Permission
<b>DESCRIPTION:</b>	Erection of up to 32 hectares of fixed (non-rotated) 'Spanish' polytunnels over arable (soft fruit) crops grown on 'table tops'.
<b>APPLICATION NO:</b>	173774
<b>GRID REFERENCE:</b>	OS 353986, 223221
<b>APPLICANT:</b>	Mr Mark Green
<b>PARISH:</b>	Llangarron

### 1. Introduction

- 1.1 My name is Charles Potterton. I am a Chartered Member of The Landscape Institute and Director of Potterton Associates Ltd. I hold a BA Degree in Landscape Architecture (1982), a Diploma in Landscape Architecture (1983) and have been practicing as a Landscape Architect since 1984.
- 1.2 Potterton Associates Ltd was founded in 1992, is a Registered Member of the Landscape Institute and trades as a Limited Company. I am Chairman of the Conservation Areas Advisory Committee, which advises Worcester City Council on matters affecting the Conservation Areas across the City. I am consultant Landscape Architect to a number of other Local Authorities including Malvern Hills District Council, Bath and North East Somerset District Council and Swindon Borough Council.
- 1.3 I was commissioned in December 2017 to assist Herefordshire Council on the Landscape and Visual Impact (LVIA) elements of the application. I am familiar with the site and its surroundings and have walked and driven extensively in the area to gauge the likely Landscape and Visual Impacts resulting from the scheme.
- 1.4 Whilst there will inevitably be some impacts emanating from the construction phase, these are generally more to do with traffic and less to do with landscape and visual impact. As such, I have generally restricted my comments to the completed scheme.

## **2. The submitted LVIA**

- 2.1 A Landscape and Visual Impact Assessment was undertaken in 2015 and submitted as part of this application.
- 2.2 I note that the LVIA was carried out based on a visit in October 2015 which would mean that trees / hedges would have had full leaf cover. Given the scale and importance of the this application, I would have expected a greater number of site visits with a range of assessment timings to at least include the discussion of winter / no leaf cover effects and impacts.
- 2.3 Furthermore, a number of important changes to the local landscape have occurred in the years since the LVIA was carried out. These have changed the immediate character of the site and, most importantly, the nature and extent of views into the site. These changes have not formed part of the assessment and I consider this to be an important weakness.
- 2.4 Nevertheless, looking at the submitted LVIA, I would make the following comments –
- 2.5 The proposed development will cover a large area of previously undeveloped land with polytunnels which consist of steel tubular steel frames and polythene covering. The application also contains various ponds and a central conglomeration of mobile homes and buildings. The site is accessed via a new entrance off the adjacent A466.
- 2.6 Based on my current knowledge of the LPA and an assessment of the most recent aerial imagery, it appears that there are no other polytunnels within 3k in any direction, so it cannot be said that this is a common or existing characteristic within the general area where it might be visible. It is true that there are other polytunnels in the wider landscape.
- 2.7 The assessment must therefore identify where these changes can be observed and quantify the significance of the effect.
- 2.8 I find that the LVIA does not properly assess or discuss the likely significant impacts on the various residential receptors surrounding the site.
- 2.9 These are –

**Reward & Patience** – both have a view straight into the new access into the site. This is assessed as an impact that is major/moderate adverse in significance. I generally agree with this assessment although I would consider it to be 'major'.

**Solomons** – is mentioned by name, but no actual assessment is made apparently because there is no public access. Whilst there is no public viewpoint, this does not mean there should be no proper discussion on the likely impacts. Photographs and an assessment could easily have been made from within the application site. I consider that the impact will be moderate adverse because the primary view from this property would be away from the site.

**Collinsbill Cottage** – as with Solomons, there is no proper assessment of the impact. Whilst there is no public viewpoint, this does not mean there should be no proper discussion on the likely impacts. Photographs and an assessment could easily have been made from within the application site. I consider that the impact will be major adverse.

**Biddlestone** – extraordinarily, this property sits within 60 metres of the site and is the key property in the area, yet is not assessed in the LVIA. The new balancing pond (No 1) has a bank of some 4m and is located just outside the garden of this property. This is not mentioned in the LVIA. It is understood that this is a private property, but such is the intervisibility and close proximity, that an assessment should have been made from within the application site. This is such a glaring and important omission that the validity of the LVIA must be questioned.

**Cluster of buildings incl. Bramley Barn, Orchard barn, Meadow View & Five Fold** – these are not mentioned anywhere in the LVIA. Most of these properties sit within 150m of the site and have a view of at least most of Area 12. This is also a worrying omission.

- 2.13 There are a number of Listed buildings in the area. Whilst the landscape setting of the Summerhouse at Biddlestone would, to a degree, be harmed by the proposals, it will be for the LPA's Principal Historic Building Officer to form a view as to the degree of harm to the significance of that heritage asset. It is my view that landscape mitigation could satisfactorily address this matter.
- 2.14 Overall, in my opinion, the levels of landscape harm (visual / character) harm on residential properties are not properly assessed and, where they are, they are generally underestimated by the LVIA.

### **3. Visual Impacts**

- 3.1 I understand that the location of receptors was not specifically agreed with the LPA and focused originally within 1.5k of the scheme. The Case Officer requested additional locations and these have been provided.

- 3.2 However, I do not consider that the chosen viewpoints are a proper representation of the possible views. I accept that they are representative only, but the level of discussion following each viewpoint is not to an appropriate level of detail.
- 3.3 It is obvious that receptors located closer to the scheme will be affected to a greater degree than those located further away.
- 3.4 Having visited the site and its surroundings and based on my experience of other similar schemes, I consider that 3.5k would represent the extent of the distance within which the scheme could be said to cause a significant impact.
- 3.5 I also consider that local topography means that the A4137 on the immediate eastern boundary is the general limit of views from the east of the site. I also consider that the A466 represents the realistic extent of views from the west. The B4251 generally forms a logical northern line to the views from the north.
- 3.6 Views to / from the south are more extensive and include Llangarron and Llangrove. There are numerous views from the nearby roads and PROW's.
- 3.7 Generally, the visibility of the site can be divided into the various quadrants of the compass (N, S, E and W). In each case, any receptor would probably see up to some 20-25 acres from any given direction.
- 3.8 Beyond that distance, where views may exist, they would generally be from a higher elevation and in such a location where there is a panoramic view within which this scheme would only form a relatively small part. From these distances, the tunnels would generally be seen as a change in colour and texture in the existing field pattern when viewed from longer distances or from elevated positions. I do not think that long distance views are a major issue in that respect.
- 3.9 I consider that the level of visual impact has not been assessed properly. I would conclude major adverse on the adjacent residential receptors, medium / moderate adverse on those driving past the main site frontage and reducing to minor adverse to longer distance receptors.

#### **4. Landscape character**

- 4.1 Most importantly, changes to landscape character do not necessarily have to be visible to be adverse and harmful. I do not agree with the LVIA where it simply states that polytunnels already exist in this landscape, are an agricultural element, and, as this scheme is simply more of the same, then there is no harm. It is my opinion that this is an overly-simplistic argument.

- 4.2 There is no question that polytunnels form part of production of soft fruit and that they are therefore part of an agricultural process. The primary difference between this and other types of agriculture is the visual impact and impact of landscape character that these large-scale operations may have.
- 4.3 Other large scale agricultural elements also exist in the landscape, such as the large sheds at Ditton Farm. It cannot be the case that it would cause no harm if this site were to be covered with similar buildings just because they exist elsewhere. Each application must be considered on its own merits.
- 4.4 Polytunnels do exist in the wider landscape, but none in this immediate area. This scheme would therefore introduce an element that would significantly change the character of the landscape from brown soil, green grass or golden crops to a large swathe of polythene. My visual assessment has found that from any of the given 'primary' viewpoints, at least two fields of polytunnels will be visible in each case with more polytunnels probably visible as background (depending on topography).
- 4.5 This land does have a history of fruit production, albeit generally in the form of Orchards. It can be argued that this is simply a different method of production. Again, whilst valid to a degree, it is over-simplifies the issues.
- 4.6 In respect of Landscape Character, I also conclude that the effect is major adverse in significance as 'The proposals would be at considerable variance with the local landscape. They would degrade, diminish or destroy a highly valued landscape or its characteristics, features or elements'.

## **5. Possible benefits**

- 5.1 The balance of 'harms' against 'benefits' must be considered. In this case, there are few site based benefits, certainly none that could not be brought forward without the scheme, so any scheme-based proposals are cannot properly be considered as benefits per se.
- 5.2 Importantly I cannot see any benefits to those receptors that would be subjected to the harms.

## **6. Proposed landscape scheme**

- 6.1 The topography of this site is complicated and, allied to the existing vegetation, is the key to how and where the site can be seen from and where extensive planting might be appropriate and successful in mitigating the harms.
- 6.2 In reality, one can only really properly mitigate short range views where the receptor is relatively close to the element that needs to be screened. In those

cases it is generally better to place the screen closer to the viewer rather than the element to be screened.

6.3 In longer range views, especially given sloping land, perimeter (or even internal / field boundary) planting will not screen those elements that are located behind on sloping ground.

6.4 Landscape proposals (as submitted) appear to be restricted to three areas –

**Road frontage** – will take a long time to establish as an effective screen. The LVIA accepts this (p345). In any case, the proposed planting (Drg 11b/c/d) appears to be within the necessary visibility splay, with the group of 4 No trees to the extreme end of the road frontage is within the grass verge and outside the site boundary.

**Internal accommodation area** – already contains some orchard trees and any planting will do nothing to help screen the polytunnels that surround it.

**South west corner adjacent to Collinsbill Cottage** – located around balancing pond. Given rising landform, this will only provide lower level screening which, given the rising ground, be ineffective in screening the polytunnels from the wider landscape.

6.5 I do not think that the proposed landscape scheme is extensive enough to properly address landscape harms. Even if it were possible to remove the key impacts on some of the receptors, the others would remain and they remain as harmful.

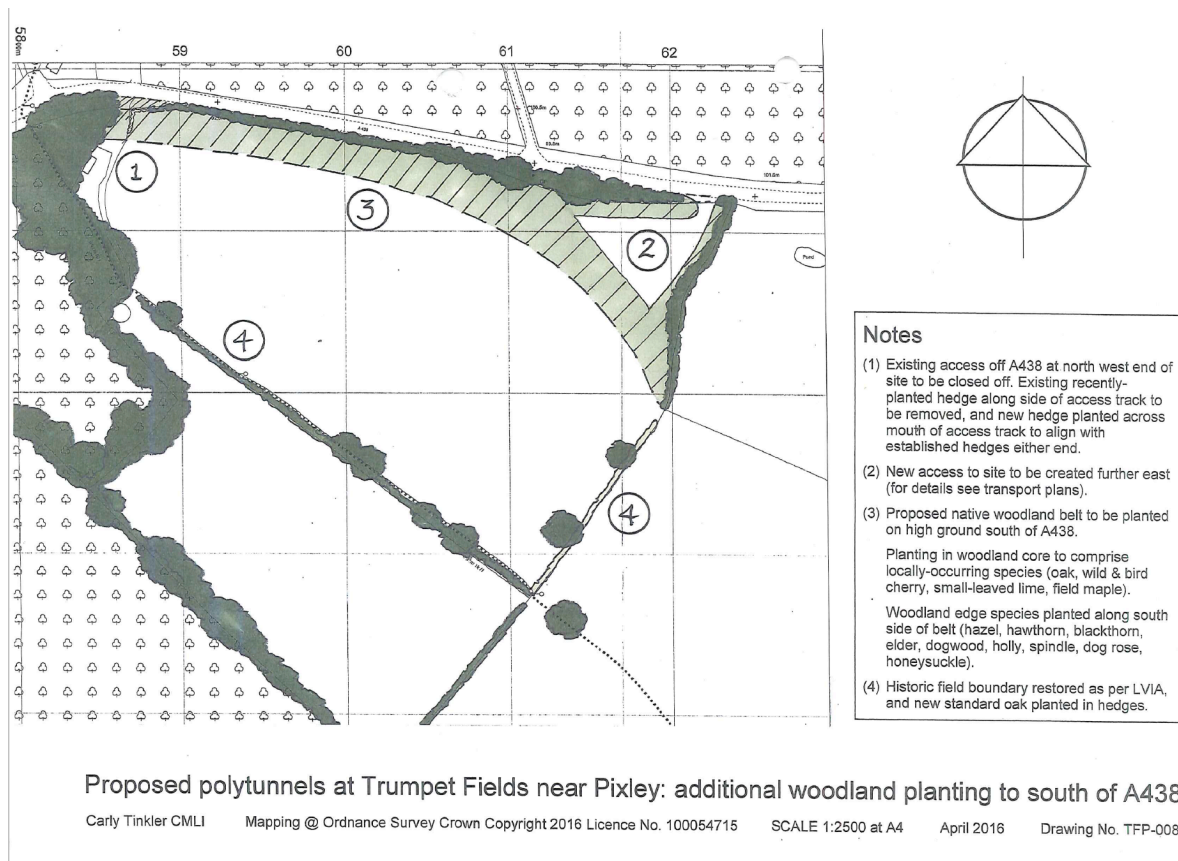
## **7. Conclusions**

7.1 Overall, I do not think that the LVIA has properly assessed the likely effects of the scheme. In some cases, the lack of discussion leads me to question the overall value of the document as a true representation of the likely significant effects of the scheme.

7.2 In terms of visual effect, I consider that the scheme would, on balance, have a moderate adverse effect in that *'The proposals would cause substantial permanent loss or alteration to one or more key elements of the landscape, to include the introduction of elements that are prominent but may not be substantially uncharacteristic with the surrounding landscape. The Development would be visually intrusive and would adversely effect upon the landscape'*.

- 7.3 It is accepted that these views may change and may reduce in magnitude as one moves away from the site, but the harm to those using the A4137 and those residential receptors with closer range views, would remain and this is a significant issue.
- 7.4 It is also accepted that polytunnels already exist in the wider landscape, although none within 3.5-4k of this site.
- 7.5 It is also true that they are not attractive feature and cannot be said to enhance the landscape. En-masse, they have potential to cause considerable harm to those that view them as well as harm to the character of the area. In this case, local topography and vegetation (primarily Upper Heath Wood) combine to mean that from any given location, one generally only sees two fields of polytunnels. In most cases, these 'two fields' average some 20-25 acres.
- 7.6 A change in character would be total and include the full extent of the site. It would remain as harmful throughout the life of the scheme. However, the scheme could be perceived as more acceptable if it brought forward some landscape benefits.
- 7.7 Although not current, the Herefordshire Polytunnel SPD (2008) does set out some important principles which are still relevant –
- 4.13 It is often inevitable that proposals for development in the countryside will alter the appearance of the landscape. However, the Council's planning policies stress the importance of ensuring that change should be appropriate to its setting and not be allowed to overwhelm and destroy the inherent character of the landscape. The landscape's ability to accept a polytunnel development without undue harm should be a prime consideration.*
- 7.8 I have studied the various locations where the site may be visible and have made an assessment of which parts of the scheme could be seen from each of those locations. Based on the sloping nature of the site, it will not be possible to screen all the site from all directions.
- 7.9 It is accepted that invisibility is not possible or necessarily a target, but there must be a more concerted effort to provide an appropriate and adequate planting scheme that would provide some shorter term screening and longer terms landscape structure.
- 7.10 I do not consider that the adjacent AONB would be directly affected by the scheme.

- 7.11 Overall, in its current format I do not think that the scheme has properly assessed the extent and nature of the harms, specifically to adjacent receptors, to a point where I must conclude that the scheme is not acceptable in its current format and should not be supported.
- 7.12 Having said that, given that the perimeter areas of the site slope up or down to a central plateau, then I can see that it would be possible to improve the containment of the site to an acceptable level by planting a buffer zone in locations where it would provide important screening. A scheme should be developed (similar to the diagram below) to provide a more substantial scheme of planting (e.g. strategic landscape / woodland belts of 20 m- 30 m in width).



*(Included for illustrative purposes only – not to scale)*

- 7.13 Any proposed planting must be developed to reflect the wider character of the landscape and in line with aims and aspirations of the Herefordshire LCA. It must not be that this planting is itself viewed as an alien feature in the landscape.



- 7.14 The full extent of the new planting might be adjusted to take full account of the exact location of new ponds and depth / quality of existing vegetation in specific locations. This could even include off-site planting where ownership allows
- 7.15 This must also be allied to a long-term management strategy which includes a program for removing the inappropriate conifer and single species hedging and replacing them with native hedgerows. These hedgerows must be set within an appropriately sized 'exclusion' zone.
- 7.16 Whilst this would not remove all the harmful views, it would reduce the more harmful and, most importantly, help to provide significant habitat offset (benefit) and add much improved GI connectivity and habitat value.

It is also possible that the arisings from the pond construction could be used to create some localised ground shaping (appropriate in terms of height and curving / sloping nature) to bolster the new planting and give some more immediate impact.

- 7.17 It might also be appropriate if the main entrance is staggered to remove or reduce direct views straight down the main drive. This would help to reduce the impacts on Hope and Patience in particular. A higher quality entrance using some more traditional stone walling and timber gates would help to improve the appearance of the road frontage.
- 7.18 Whilst the wider scheme would still change the character of the land, I suggest that the planting and management schemes would provide much needed long term structure to this landscape. Should the polytunnels stay for a longer period, then this planting would grow into an effective landscape structure. This would be more in keeping with the aims and aspirations of the Herefordshire Landscape Character Assessment which recommends conserving and enhancing the hedgerow pattern.
- 7.19 If that were to be brought forward, then I consider that the harms could be offset to a more appropriate level in the longer term. Given the scale and importance of the scheme and the importance of the suggested landscape scheme it is my advice that permission is not granted until this change is brought forward. I do not think it is appropriate to rely on subsequent planning conditions to achieve such an outcome.

Charles Potterton  
31<sup>st</sup> January 2018