

An overview of Landscape and Visual Matters for Greenwich Hospital and Strutt and Parker

Regarding emerging Site Allocation SAMU2 Hartley Gardens, Clacton, Essex

For the *“Independent Examination of Section 2 of the Tendring District Local Plan 2013-2033 and Beyond”*.

Draft Allocation Reference: SAMU2 Hartley Gardens

LPA: Tendring District Council

The Site (SAMU2) is supported by a draft allocation in the emerging Tendring Local Plan ‘2013-2033 and Beyond’. The Council has produced Topic Paper 6: Hartley Gardens, which provides an in-depth review of environmental issues associated with the land in order to support the proposed allocation. That document incorporated a Landscape Character and Sensitivity Study amongst other studies (by Place Services on behalf of the Council) and various appendices.

It should be noted that the Greenwich Trust are one of the landowners involved in the allocation of the Site (as shown on Appendix 1 of the Topic Paper – plum colour ref EX835758).

Landscape Baseline and Landscape Character Assessments (LCA)

National (Natural England): NCA 111 North Thames Basin

County (CBA 2003): The majority of the site falls within LCT E (London Clay) LCA Area E3: Tendring Plain, whilst the southern edge falls within LCT F (Coastal Landscapes) LCA F7: Brightlingsea Clacton Frinton Coasts.

(Due to the broader nature and scale of a regional assessment, the distinction between the 2 LCAs has not been well defined at regional level – the detail shown in the district assessment (below) irons this anomaly out by considering a finer grain).

District (LUC 2000): Tendring Landscape Character Area 2001 Volumes 1 and 2: The Landscape Character Type (LCT) is the Clay Plateau, whilst the LCA is area 8B: Clacton and the Sokens Clay Plateau.

The assessment records a landscape which is “densely settled”¹, but gently undulating agricultural plateau with key characteristics such as,

“Urban fringe character enhanced by presence of nurseries, caravan parks, paddocks, holiday parks and industrial estates on the edges of Clacton and Frinton”, and

“Low, gappy hedgerows with occasional hedgerow trees divide arable fields”, and

“Good access provided by the A133, B1033 and B1441 which form a backbone for the ribbon development that dominates the areas around Clacton and Frinton”.

The evaluation of the LCA² is that **Character** “.....is **Weak**, although could be considered **Poor** in some urban fringe locations”. The **Condition** as a result of change, leading to loss of landscape features, built development and the urban fringe surrounding Clacton, development has frequently severed parcels of agricultural land and results in landscape which is assessed as one that “has been **Declining** over many years”.

The 8B Clacton and the Sokens Plateau (page 149) is said to be visually sensitive as a result of open and rural character and long views and it is recognised that “....*areas of particular sensitivity to built development are those on the edge of the plateau.....*”.

The landscape forming the proposed allocation SAMU2 Hartley Gardens is not on the edge of a plateau overlooking any of the adjacent sensitive slopes or valley systems. Indeed, it is recognised that the presence of woodlands and gently undulating topography provide opportunities to integrate development.

As a result, the **Strategy** for this landscape is to “**Strengthen and Enhance**”, with “*particular opportunities to enhance the urban fringe around Frinton and Clacton through the creation of a new landscape character*”.

¹ TDC LCA p.147

² TDC LCA p.148

The management strategy includes a range of guidelines for the LCA, which include to, “strengthen the landscape character around existing urban settlements (Clacton and Frinton)”.

The landscape management strategy includes the following,

LCA Management Strategy Guidance	How does the proposed allocation SAMU2 contribute to the Landscape Management Strategy, Change or enhancement of features relevant to Character, as part of the LCA? (to be read in conjunction with the Topic Paper 6: Hartley Gardens; Figure 17, p.35)
8B Clacton and The Soken Plateau	
<i>“Conserve all ancient woodland sites, and promote appropriate management through natural regeneration, control of non-native species and reintroduction of coppicing as a management tool for neglected woodlands”</i>	All existing woodland, including Ancient Woodland is being retained and protected, with the provision of much greater green infrastructure and connectivity, which would be managed.
<i>“Increase extent of native deciduous woodland using natural regeneration or locally occurring native species to enhance the wooded character of the landscape. The aim should be to link existing sites”</i>	All existing woodland, including Ancient Woodland is being retained and protected, with the provision of new woodland features using native locally provenanced species to enhance the wooded character of the LCA, and link features together (see also Figure 16 Landscape Framework and Figure 20 Green Infrastructure Network Plan).
<i>“Conserve hedgerows as important wildlife habitats and landscape features and promote management of hedgerows as coppice, with oak standards left to form future timber trees”</i>	Hedgerows are being retained and protected, with the provision of new features using native locally provenanced species to enhance the character of the LCA, and link features together (see also Figure 16 Landscape Framework and Figure 20 Green Infrastructure Network Plan).
<i>“Consider opportunities for reinstatement of hedges, particularly where they have been lost from highly visible locations e.g. along roadsides”</i>	Hedgerows are being retained and protected, with the provision of new features using native locally provenanced species to enhance the character of the LCA, and link features together (see also Figure 16 Landscape Framework and Figure 20 Green Infrastructure Network Plan). (Note: One benefit resulting from the Council's omission of the Relief Road, is that such a road as was being proposed would have resulted the loss of hedgerow along roadsides, including Little Clacton Lane, and along field boundaries due to the nature of the road alignment cutting across the landscape pattern, which would have been contrary to the Landscape Guidelines/ LCA, resulting in harm).
<i>“Consider opportunities for the creation of meadows or permanent pasture to restore grassland habitats lost through agricultural intensification, for example the creation of grassland field margins”</i>	The allocation seeks to implement a large proportion of semi natural green space in the form of meadow or grassland, including wider field margins with the provision of new features using native locally provenanced species to enhance the character of the LCA, and link features together (see also Figure 16 Landscape Framework and Figure 20 Green Infrastructure Network Plan).

<p><i>"Maintain the historic leafy lanes with their ancient oaks and unimproved roadside verges. Resist road improvements or widening that would threaten their rural character"</i></p>	<p>Little Clacton Lane will be maintained as existing for the most part with no change to its width or character, with development offset well to the east beyond generous buffer planting or existing development. Close to the existing settlement edge there will be need for a New Primary Access Road connecting into the proposed allocation at Little Clacton Lane (where it is urban in character). The integrity of the lane enables the opportunity for the inclusion of a full pedestrian / cycleway.</p> <p>(Note: One benefit resulting from the Council's omission of the Relief Road, is that such a road as was being proposed would have severed Little Clacton Lane, and which would have been contrary to the Landscape Guidelines/ LCA, resulting in a serious and direct harmful adverse effect to the character of the leafy, rural part of the lane).</p>
<p><i>"Conserve views to historic features, for example Great Holland church tower"</i></p>	<p>Historic England made representations to the Local Plan, including concerns regarding historic features. Their letter (undated) refers to heritage assets to which we comment as follows.</p> <ul style="list-style-type: none"> • Gil farm/ former farmhouses Earls Hall Lodge and Duchess Farmhouse to the south and west of the Site: Both farmhouses are located to the south and west of the proposed allocation and are largely screened by existing boundary hedges containing them, with any views already in view of the existing settlement edges. In any event, the allocation has been reduced to increase the distance between, and the new structural boundary planting around the new settlement edges will be more successful and integrate the settlement better than the existing stark edges, reducing the potential for views. • Gil buildings around Bovills Farm to the north of the Site: The proposals provide a suitable offset from the farm with the reinforcement of a structural landscape buffer beyond, reducing any impact on views or setting. The LLCA1: Wooded Fringe (Place Services, p.24) assessment, acknowledges there is no visibility currently in any event given existing vegetation structure. • Gil Bluehouse Farm to the south: The farm is located in an urban context surrounded by development on all sides. The southern part of the allocation is no longer proposed to be developed, resulting in no impact and no requirement for mitigation.
<p><i>"Consider the impact of any development on the margins of the plateau landscape - where it would have the potential to be highly visible on the adjacent character areas of the Hamford Coastal Slopes (3A), St. Osyth Coastal Slopes and overlooking the Holland Valley System (6D)"</i></p>	<p>The proposed allocation lies squarely on the plateau adjoining the settlement described as having urban fringe character, and does not fall on the margins of the plateau; thus proposed development would not have the potential to cause harm on adjacent sensitive character areas, such as coastal slopes or valley systems.</p>
<p><i>"Particular care should be taken in the siting of communication masts or other"</i></p>	<p>The landscape context in and around the proposed allocation Site contains overhead powerlines and pylons, wind turbines (5no turbines Earls Hall Wind Farm),</p>

<p><i>vertical elements - these have the potential to be highly visible in this open landscape. This also applies for large scale industrial buildings e.g. for agriculture</i></p>	<p>and large scale industrial buildings already, together with other features identified in the LCA that contribute to the urban fringe character of the edge of settlement location. The proposed allocation would see the undergrounding/burying of overhead power lines, which would be of benefit to character, together with the introduction of new landscape features to increase the wooded context.</p> <p>(Note: One benefit resulting from the Council's omission of the Relief Road, is that such as road as was being proposed would have required vertical lighting columns to meet highway requirements but aligned to the outer edge of the allocation area, but to the detriment of the Landscape Guidelines, resulting in harm to the LCA).</p>
<p><i>"Use of full cut-off lights and sensitively designed lighting schemes can reduce the impact of light pollution on night skies"</i></p>	<p>(Note: One benefit resulting from the Council's omission of the Relief Road, is that such as road as was being proposed would have required lighting levels designed to meet highway requirements at the outer edge of the allocation area, but to the detriment of the Landscape Guidelines, resulting in an increase in light pollution with harm to the LCA).</p>
<p><i>"Restrict further ribbon development and consider opportunities to strengthen and enhance the landscape setting to the villages through planting and enhancing, or creating new, village greens, which could help to maintain the individual character of individual settlements".</i></p>	<p>The omission of the southern portion of the allocation from land proposed to be developed has eliminated any perceived ribbon development along St John's Road (albeit the southern side of that road is already joined from east to west), whilst the proposals include substantial planting opportunities to enhance the setting of the settlement, compared to the current exposed and stark, urban fringe character, as well as to reinforce the character of the LCA, and link features together (see also Figure 16 Landscape Framework and Figure 20 Green Infrastructure Network Plan). This will provide screening and structure to help integrate the new settlement, whilst at the same time reinforcing the separation and increasing screening of the town from outlying areas, such as Little Clacton, helping to ensure they retain their own identity and character.</p>
<p><i>"Strengthen the landscape character around existing urban settlements (Clacton and Frinton). Ensure that development does not result in further severance and fragmentation of agricultural land and promote positive land management for remaining open areas".</i></p>	<p>The proposals include substantial planting opportunities to enhance the setting of the settlement, compared to the current exposed and stark, urban fringe character, as well as to reinforce the character of the LCA, and link features together (see also Figure 16 Landscape Framework and Figure 20 Green Infrastructure Network Plan). The proposals maintain the existing hedgerow structure to ensure that development does not sever or fragment the land, and the remaining land which would be comprised of open space can be positively managed.</p> <p>(Note: One benefit resulting from the Council's omission of the Relief Road, is that such as road as was being proposed would have resulted in the fragmentation of land parcels, the sterilisation of land being severed from adjacent areas, as part of the alignment to meet highway requirements at the outer edge of the allocation area, but to the detriment of the Landscape Guidelines, resulting in harm to the LCA).</p>
<p><i>"There are considerable opportunities for woodland creation in urban fringe areas to create new character and provide screening".</i></p>	<p>The proposals include new areas of woodland to reinforce the character of the LCA in this urban fringe location, in order to create new character and link features together (see also Figure 16 Landscape Framework and Figure 20 Green Infrastructure Network Plan). This will provide screening and structure to help integrate the new settlement, whilst at the same time reinforcing the separation and increasing screening of the town from outlying areas, such as Little Clacton.</p>

Landscape Character and Sensitivity Study (Place Services, 2000)

The Site has been subject to a landscape character and sensitivity study, in order to do this Place Services has identified a series of Local Landscape Character Areas (LLCAs) shown on Figure 14, p.35 of the Topic Paper. We generally agree with the approach taken in both the local landscape character appraisal, and the landscape sensitivity study (which finds the Site scoring is not a barrier to development), although we find the approach taken is rather cautionary and we have some comments on the analysis and judgements made, or where we disagree with the scoring.

The study is divided into 2 parts - character and sensitivity.

(We also note the numbering system for the LLCA parcels is not consistent with the Sensitivity Parcel numbering). It should be noted that we have not provided an entire analysis of the assessment here - the below are a few selected comments to highlight a few points of inconsistency or difference.

Local Landscape Character Areas (LLCA)

Firstly, the land identified as LLCA4: Urban Fringe is identified as urban fringe; however, it is not - this is urban land. It is partially developed already and there is an extant (recent Reserved Matters) consent in place for 200 homes, and the benefit of planning permission is that the character change has been set by planning precedent - this is an urban environment to the west of the already completed urban area.

The land identified as LLCA5: Arable Plains (page 28) lies in between parcels to the east and west that are developed/about to be developed. To the south, the parcel lies close to the settlement edge, which provides urban fringe influences (as described in the TDC LCA) and shown on the photograph Figure 19 for the LLCA p.28, where only the foreground is open in landscape terms and long views are not obtained to the wider landscape due to the intervening visible settlement. Infrastructure such as pylons/overhead wires are mentioned, but there is no reference to the dominant wind turbines to the west, which influence character.

The land identified as LLCA8: Constable Fringe (page 31) is a narrow parcel, contained on 2 sides by existing settlement edge, and with built development to the north west and north east. The study acknowledges the settlement "overlooks" the parcel.

Local Landscape Sensitivity

For Parcel 11 (LLCA4) we disagree with the assessment of Medium-Low Landscape Sensitivity and consider this should be Low Sensitivity at the very least (or recorded as Not Assessed) due to the mis-characterisation.

For Parcel 6 (LLCA5) we disagree with the Medium Landscape Sensitivity. Whilst the analysis states “...the lack of build development on the immediate boundaries also increases the sensitivity of the site to medium...”, this is incorrect given the adjacent LLCA6 describes residential development (and of low sensitivity, parcel 4) to the west and the soon to be constructed Brook Park West within the immediately adjacent LLCA4 (and of lower sensitivity) to the east has not be taken into consideration, rendering this statement untrue. Accordingly, the sensitivity rating should be reduced to Medium-Low.

Notwithstanding the above, the overall score for Parcel 6 combines Medium with Medium-High, equating to Medium Landscape Sensitivity. The score for Parcel 6 combines Medium with Medium-Low, also equating to Medium. However, the scores for Parcels 8 and 9 combine Medium with Medium-High, yet they also score Medium overall. We consider the scores for Parcels 8 and 9 to be inconsistent (too high) – and in addition, it also appears the visual scores have been ignored in the combined assessment in any event, with the outcome incorrectly based on landscape scores only.

Confusingly, the scores for Parcel 8 appear incorrect, since the Parcel is considered to “...has key features within, include historic elm hedgerows...”, as recorded in the landscape analysis and enclosure by vegetation, both scoring medium-high. Yet, in the visual section the analysis claims the parcel is exposed to the very locations beyond the same screening features, which are said to increase the sensitivity in the visual section. If the inconsistencies were to be remedied, this would lead to a reduction in the overall score for Parcel 8 of Medium Landscape Sensitivity and Medium Visual Sensitivity, resulting in a score of Medium overall sensitivity.

Summary and Conclusions

There is further work to be done to ascertain both the opportunities and constraints for the Site, liaison with key stakeholders and a positive approach to design suitable for a future planning application, with the benefit of more detailed input at that stage from a range of disciplines. Nevertheless, the principles set out in the masterplan are generally supported and show that at least 1667 new homes can be accommodated (as shown on the Land Use Budget Figures, p.36). Furthermore, it is recognised the Council's approach identifies only one of a number of ways a framework concept can deliver the required number of homes whilst,

- Contributing to delivering key aspects of the district Landscape Management Strategies.
- Enhancing elements that are relevant to the key characteristics of the County and District LCAs to which it applies.
- Contributing to Strengthening and Enhancing the key features of the LCA8B: Clacton and The Sokens Clay Plateau.
- Contributing to planning policies for the District, including green infrastructure (landscape, ecological, accessibility and SUDs) and other relevant strategies.

We note that the densities are uniform as set out in the Land Use Budget Figures; however, in order to respond more favourably to the Site and context, it may be appropriate to increase the densities closer to the existing settlement, thereby ensuring some flexibility when masterplanning, so that there are possibilities for the lower densities of 35dph to be in the north where the land is recognised as being slightly more sensitive.

It is clear that in respect of landscape and visual matters, the omission of the relief road is welcomed, and as set out above demonstrates the Council's decision to drop it as being correct, as otherwise it would have caused a significant number of landscape and visual harms on the features, elements and perceptual aspects of the character area if it had been retained.

Liz Lake Associates

January 2021



KEY:



Broad Search Area



Project: Hartley Gardens, Clacton
Client: Greenwich Hospital Trust
Date: December 2020
Scale: 1:25,000 @ A3
Status: FINAL



KEY:

 Broad Search Area



Project: Hartley Gardens, Clacton
Client: Greenwich Hospital Trust
Date: December 2020
Scale: NTS @ A3
Status: FINAL



KEY:

-  Broad Search Area
-  1km Study Area
-  Site of Special Scientific Interest (SSSI)
-  Local Nature Reserve (LNR)

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Scale: 1:25,000 @ A3
Status: FINAL





KEY:

- Broad Search Area
- 1km Study Area
- Grade 1 Listed Building
- Grade II* Listed Building
- Grade II Listed Building
- Scheduled Monument
- Park and Gardens
- Great Clacton Conservation Area

Public Right of Ways:

- Public Footpath
- Bridleway

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Date: December 2020
Scale: 1:25,000 @ A3
Status: FINAL





KEY:

-  Broad Search Area
-  1km Study Area

Woodland Designations:

-  Priority Habitat Inventory - Deciduous Woodland
-  Priority Habitat Inventory - Traditional Orchard (England)
-  Woodpasture and Parkland BAP Priority Habitat (England)
-  Ancient and semi-natural woodland

Grassland Designations:

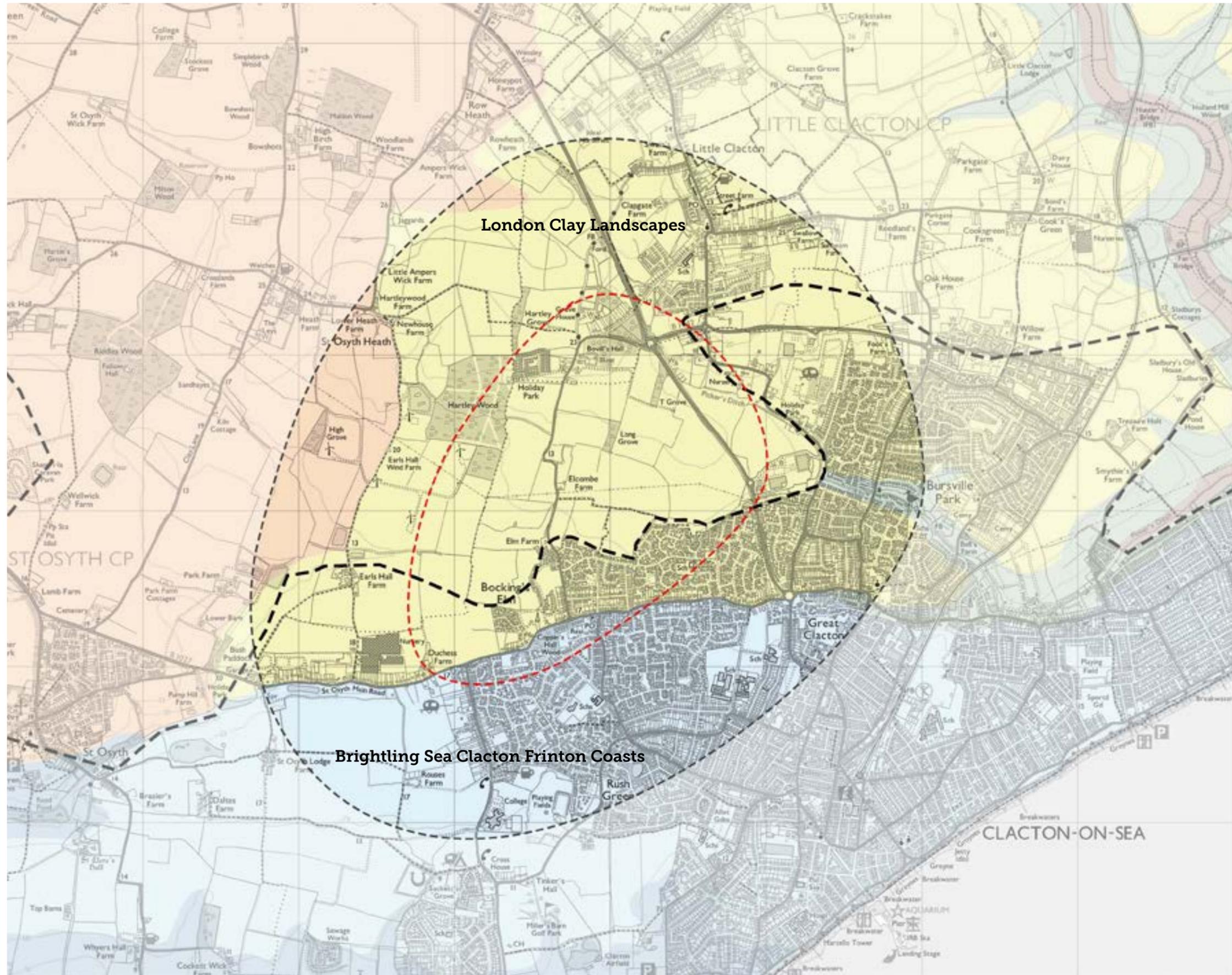
-  Priority Habitat Inventory - Coastal and Floodplain Grazing Marsh

Coastal Designations:

-  Priority Habitat Inventory - Maritime Cliffs and Slopes

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Status: FINAL

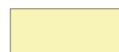




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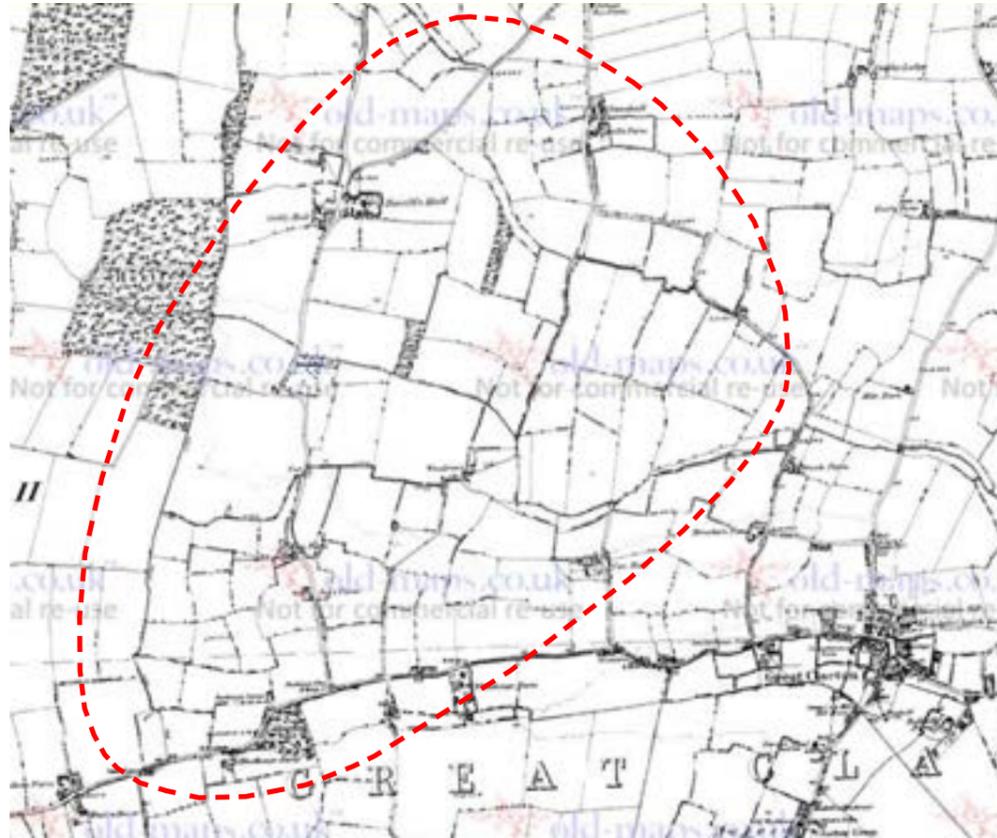
-  Broad Search Area
-  1km Study Area
-  Essex County Council Landscape Character Types

Tendring District Council Landscape Character Areas:

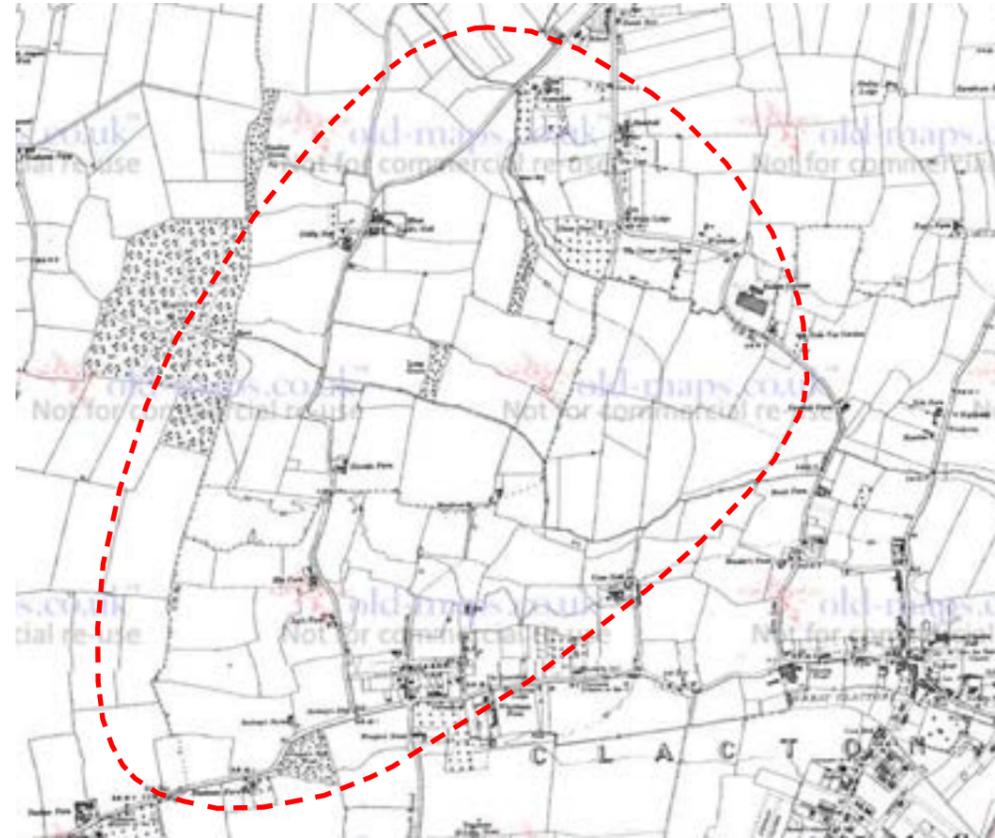
-  8B: Clacton and the Sokens Clay Plateau
-  4D: St Osyth Coastal Ridge
-  6D: Holland Valley System
-  7B: St Osyth / Great Bentley Heaths
-  3C: St Osyth Coastal Slopes
-  5A: Holland Brook

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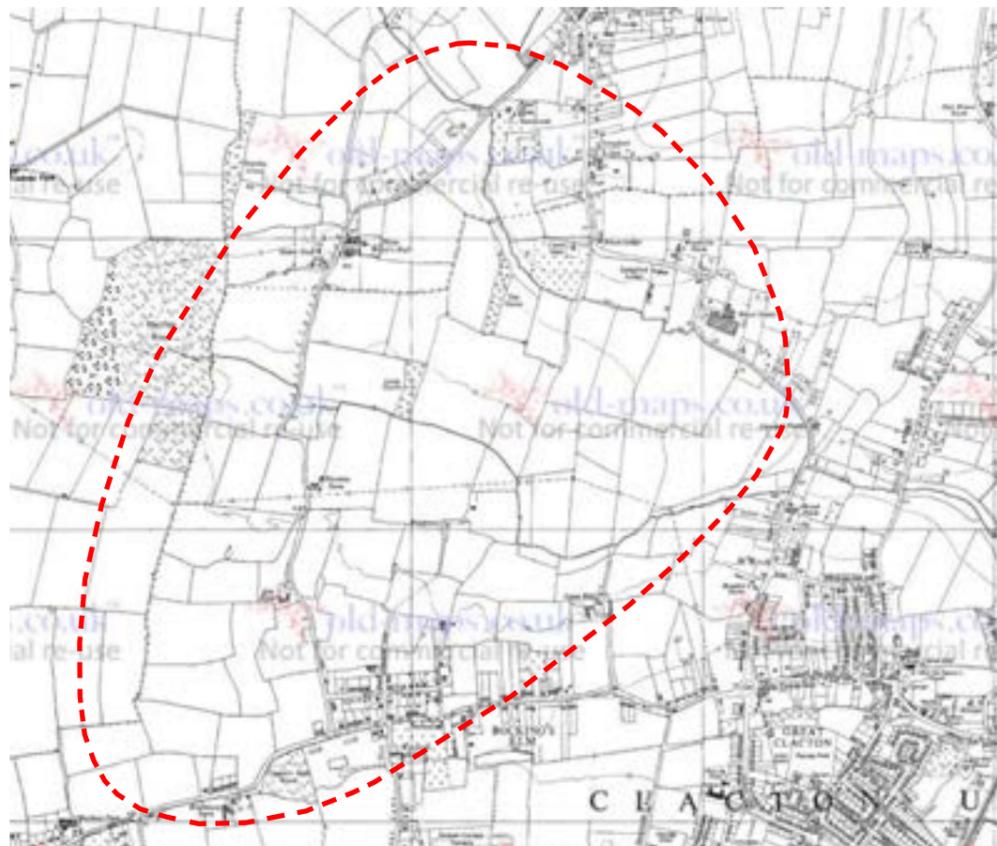




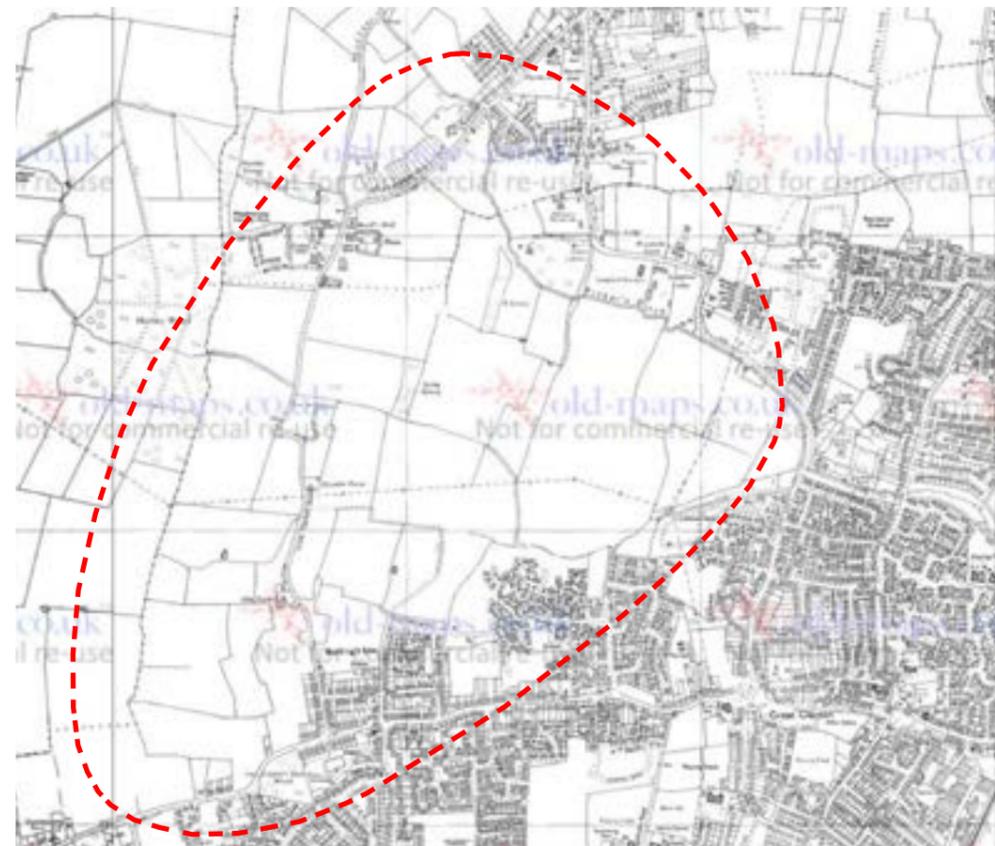
1880



1925



1958



1976

KEY:



Historic Mapping taken from:
www.Old-Maps.co.uk



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Scale: NTS @ A3
Status: FINAL