



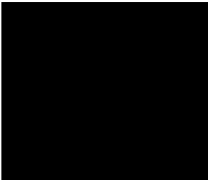
Land near Hodder Bridge, Chaigley

**Landscape Representations to
planning application reference
3/2021/1008**

Additional information - March 2022

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1. Purpose and scope of note

- 1.1. [REDACTED] Landscape Architects were commissioned in November 2021 by [REDACTED] to undertake an independent review of a planning application which has been submitted to Ribble Valley District Council. The application is for a New House of Exceptional Quality (NPPF Paragraph 80e), with associated landscaping and biodiversity enhancement, at a site located near Hodder Bridge, Chaigley. The site lies within the Ribble Valley District Council (RVDC) jurisdiction and the Forest of Bowland Area of Outstanding Natural Beauty (AONB). The planning application reference is: 3/2021/1008.
- 1.2. Landscape Representations, based upon a desk study, were prepared in November 2021 and submitted to Ribble Valley District Council as part of an objection to the proposed development. The Landscape Representations focused upon the potential impacts of the proposal specifically upon:
 - *Landscape character*
 - *Views*
- 1.3. The observations made in the Landscape Representations (30 November 2021) remain valid.
- 1.4. This note considers additional information which has been made available after the submission of the original Landscape Representations. Ribble Valley District Council uploaded the following additional documents to the planning application website in January 2022:
 - *Planning Statement (undated)*
 - *Landscape Design Statement (March 2020, Rev B)*
 - *Landscape Masterplan (Rev C)*
- 1.5. In addition, a site visit was undertaken in February 2022 to gain a clear understanding of the site and to ensure that any desk-top observations previously made remain valid.
- 1.6. The Landscape Representations have been prepared by [REDACTED]. [REDACTED] has extensive experience preparing LVIA reports and is an experienced expert witness in relation to landscape and visual matters.

2. Review of additional documents

Planning Statement

Grade II Listed Higher Hodder Bridge

- 2.1. Section 2 of the Planning Statement discusses the site location and designations. At paragraph 2.6 reference is made to the Grade II listed Higher Hodder Bridge which is located immediately to the north-west of the site. The Statement advises that *'there would be no intervisibility between it and the new house'*. The Statement fails to acknowledge that in winter, both the site and the Grade II listed bridge are together visible in views from PROW 3-3-FP 48 and PROW 3-3-FP 48a which follow the route of the River Hodder to the immediate south of the site. The development of the site would alter the visual setting of the Grade II listed Higher Hodder Bridge in views from these public routes.



Figure 1 Winter view from PROW 48a showing Grade II Listed Hodder Bridge in the same view as the site

AONB purposes

- 2.2. Paragraphs 2.22 to 2.29 discuss the purposes of AONB designation. It is confirmed here that *'AONB's are designated solely for their landscape qualities, for the purpose of conserving and enhancing their natural beauty...'*. The Planning Statement presents no evidence to demonstrate that the site is located in an area which requires, or could benefit from, enhancement. As such the default position should be to 'conserve' natural beauty.
- 2.3. Para 2.26 incorrectly advises that *'equally important is the fact that designation also refers to the ecology of an area'*. The term 'ecology' is not specifically mentioned within the Natural England explanation of the purpose of the AONB designation.

NPPF (2021)

- 2.4. Section 3 of the Planning Statement refers to the history of planning policy. Only NPPF 2021 is relevant to this planning application. The discussion of NPPF 2021 paragraph 80(e) focusses solely upon the first bullet which relates to architectural quality. No discussion is made in Section 3 relating to the second bullet which requires development to *'significantly enhance its immediate setting'*.

Landscape enhancement

- 2.5. Section 4 of the Planning Statement advises that the project has been '*landscape-led*'. The landscape 'enhancement' claims focus strongly upon biodiversity net gain, rather than enhancement of landscape character which would be more appropriate in an AONB which is nationally designated for its natural beauty.

Assessment against NPPF Paragraph 80(e)

- 2.6. Section 5, paragraphs 5.18 to 5.38 seek to 'assess' the scheme against the second bullet of NPPF Para 80(e). This section of the Planning Statement largely reiterates the success of other schemes which have been granted consent elsewhere. Each planning application must be considered on its own merits.
- 2.7. Paragraph 5.31 seeks to explain how the scheme will significantly enhance its immediate setting. The primary argument used here is that the scheme '*can significantly enhance an undeveloped field*'. The LVIA which was submitted with the application evidenced that this field is of high landscape value, high sensitivity and high landscape condition. The site is located within an AONB and has remained unchanged since 1886. Unnecessary change (amounting to mitigation for built form) would not amount to conservation of the natural beauty of the area and could not be considered as enhancement.

Case Studies

- 2.8. Appendix 1 of the Planning Statement includes four case studies showing new houses approved in AONB's. Of the examples, only one provides an Appeal Reference to allow review of the details of the case.
- 2.9. The Planning Statement refers to a scheme granted consent in March 2020, in Icomb and the Cotswold Area of Outstanding Natural Beauty (ref: APP/F1610/W/19/3236430) advising that this specific scheme is relevant to the Hodder Bridge proposal as it is '*one of a number of examples of where a decision maker has determined that a new country house proposal will enhance its AONB setting and be sensitive to the defining characteristics of it*'.
- 2.10. A high-level review of the appeal decision for the Icomb case indicates that part of that site had been in use as a traveller pitch. The land was described as '*somewhat degraded with suburban features and planting of laurel hedging. The 'meadow' to the north is natural in character and appearance but does not have the appearance of either farmed land or grazing*'. It is apparent from the Inspector's report that this scheme had potential to 'enhance' degraded land within the AONB. These circumstances cannot be compared to a site which has been established by the applicant to be of high landscape value, high sensitivity and high landscape condition.

Traditional Architecture Group (TAG) Peer Review

- 2.11. The TAG peer review is appended to the Planning Statement. The review states that the panel feel that the scheme would fulfil the requirements of NPPF Paragraph 80(e). Details are provided within the review as to why the landscape and siting of the proposal are considered acceptable.

- 2.12. The panel appears to come from the starting point that this site is suitable for development in principle, rather than undertaking a clear assessment of the baseline situation to understand if this specific site requires 'conservation' or 'enhancement'. As such, the panel fail to grasp the existing value and sensitivity of the site which is separately evidenced within the baseline chapter of the submitted Landscape and Visual Impact Assessment.
- 2.13. The panel observe that *'the river setting is of interest in that is more of an acoustic presence than one which is visible, the river set some meters below the edge of the bank'*. This analysis considers only outward views from the site itself, and fails to recognise that the river is strongly visually prominent in views towards the site from the PROW located to the south, where it is noted that the Grade II listed Higher Hodder Bridge is also visible in the same view. The visible relationship between the bridge, the river and the open site together create the distinctive local character which is experienced from the stretch of riverbank visible from PROW 48 and 48a.

Landscape Design Statement (March 2020, Rev B)

- 2.14. The Landscape Design Statement pre-dates the submitted Landscape and Visual Impact Assessment (LVIA) and appears to have informed the preparation of the subsequent LVIA document (previously reviewed in Landscape Representations dated November 2021). The introduction sets out the main aims of the report which are broadly to understand the baseline situation and to develop early concepts for the landscape and develop distinct character areas within the site to inform the location of the proposed dwelling.
- 2.15. At page 7, the aspirations of the site are set out. The document states that the proposal would seek to significantly enhance the immediate setting of the site in a number of ways, including:
- *'responding to place and the existing best remaining landscape features'*
 - *'Sensitively respond to and retain historic views and vistas'*
 - *'Respect the rich character of the landscape setting of the site'*
 - *'Restore and maintain specimen trees and hedgerow planting...'*
- 2.16. These 'aspirations' indicate that the site has degraded or lost features over time which would be beneficial to replace, however the site has remained unchanged since 1886 and retains a sense of openness and natural beauty originating from this time which is visible in public viewpoints in the context of a Grade II listed building at Higher Hodder Bridge. The submitted LVIA has established that the landscape of the site is of high value, high sensitivity and high landscape condition. 'Sensitive' retention of historic vistas and views would therefore involve keeping the site open in its entirety and continuing to conserve the existing landscape pattern.
- 2.17. The remaining sections 2 - 6 of the Landscape Design Statement present analysis of the site and its landscape context (much of which has been repeated in the LVIA and is discussed in the previously submitted Landscape Representations), and information relating to the design

evolution based on an assumption that the site is in principle suitable for development, with the idea that the site can be enhanced through change.

Landscape Masterplan (Rev C)

- 2.18. The latest Landscape Masterplan (Rev C) appears to have one single difference to the previously reviewed version. This is a change to the title of keyed item 13 'Access Track' where a bracket has been added to note '*maintenance, agricultural and emergency access*'.
- 2.19. This change has no impact to landscape and visual considerations as previously considered.

3. Observations from site visit

Views from PROW 3-20-FP1

- 3.1. FP1 passes through the site, connecting Chipping Road with the unnamed road serving Withgill Farm to the east. The route passes alongside a small group of existing houses close to Chipping Road. Further east, the PROW route passes along the edge of open fields, which include the site sloping away to the south, before descending into a wooded corridor which follows the route of a small tributary to the River Hodder.
- 3.2. In the vicinity of the site, the PROW route has an open setting and benefits from longer views towards Longridge Fell which is a recognisable local landmark to users. In the middle view, there are views towards the wooded valley which contains the River Hodder below (not visible). In winter views, the deeply incised valley sides can be seen through the trees. These features are typical of the LCA and further contribute to the character and sense of place which is experienced in views from PROW 3-20-FP1.



Figure 2 View from PROW FP1 looking south west across the site towards Longridge Fell and incised river valley corridor

- 3.3. The deciduous tree planting associated with the proposed development would screen a large proportion of views to both Longridge Fell and the deeply incised river valley in views from PROW 3-20-FP1. There would be an increased sense of enclosure to the PROW route along its southern edge. Cumulatively these changes would reduce the 'sense of place' as experienced from this PROW route.
- 3.4. The proposed development would result in adverse impacts to views from PROW 3-20-FP1.

Views from PROW 3-3-FP48 and 48a

- 3.5. PROW FP48 and FP48a follow the corridor of the River Hodder, passing close to its southern banks. In the vicinity of the site, the PROW routes pass through deciduous woodland from where there are winter views across the River Hodder looking north and east towards the site.
- 3.6. To the north of the Higher Hodder Bridge there is no further public riverside access to the River Hodder until Dunsop Bridge, approximately 12km north. This increases the local importance of these PROW routes as they provide an opportunity to experience the rural river corridor which is otherwise limited in the wider area.

- 3.7. In winter views from the PROW routes, the site is visible as a distinct open grass field which provides a recognisable feature in the journey along the PROW corridor. The wider PROW route passes along the deeply incised river corridor which is frequently enclosed by deciduous woodland. Areas of open land, such as the site, punctuate the PROW route, providing visual variety, contributing to a distinct sense of place and providing an appreciation of openness and tranquillity.



Figure 3 View from PROW 48a looking north towards the site

- 3.8. In views from the PROW route, the open site, the river and in some locations the Grade II listed Higher Hodder Bridge, are visible in one view, which together create a distinctive character and provide an attractive setting to the PROW route where the natural beauty of the AONB can be experienced.
- 3.9. The proposed development would introduce built form of significant size into the winter views from PROW 3-3-FP48 and 48a. This would alter the setting of a Grade II listed building at Higher Hodder Bridge in views from the PROW network. The introduction of additional built form in the view would adversely impact the perceived tranquil/rural setting of the PROW route. The introduction of additional landscaping upon the site would change a landscape which has been open for an estimated 136 years, reducing openness which contributes to the distinct sense of place and natural beauty as experienced in views from the PROW route.
- 3.10. The proposed development would result in adverse impacts to views from PROW 3-3-FP48 and 48a.

4. Summary and conclusions

- 4.1. This Landscape Representation note has been prepared to provide comment on additional Information which has been provided in relation to planning application ref: 3/2021/1008. This information was not publicly available at the time of submission of the original Landscape Representations in November 2021.
- 4.2. In addition, a site visit was undertaken in February 2022 to gain a clear understanding of the site. Following both the document review and site visit it is confirmed that the comments and observations made in the original Landscape Representations remain valid.
- 4.3. The additional documents which have been reviewed are:
- *Planning Statement (undated)*
 - *Landscape Design Statement (March 2020, Rev B)*
 - *Landscape Masterplan (Rev C)*
- 4.4. No additional evidence has been identified within the above documents to demonstrate that the proposals would be in accordance with NPPF Paragraph 80e, which requires a proposed development to *'significantly enhance its immediate setting'*. The wording of para 80e makes it clear that an absence of harm is not enough to justify development of isolated homes in the countryside. Schemes must demonstrate not only enhancement, but *'significant'* enhancement of the immediate setting of a site to comply with para 80e. As such the application is considered to conflict with NPPF Para 80e.
- 4.5. Similarly, no valid additional evidence has been identified within the above documents to demonstrate that the proposals are in accordance with Ribble Valley Core Strategy Key Statement EN2. EN2 seeks to protect, conserve and enhance the landscape character of the Forest of Bowland AONB. Specifically, it requires any development to *'contribute to the conservation of the natural beauty of the area'*. As such the application is considered to conflict with EN2.
- 4.6. On the basis of the above, it is considered that application should be refused.

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