Worcestershire County Council
Malvern Hills AONB Unit
Manor House
Grange Road
Malvern
WR14 3EY

Monday, 23rd April 2018

To: Susan Satchell, Secretary to the Board, Malvern Hills Trust

Part 2 advice: Proposed residential development of land at Rose Farm, Malvern

Part 2 of the Scope of Services and Fee Proposal (dated 30th August 2017) involved one task, as follows:

1. Assess a revised landscape mitigation report prepared by the developer's Landscape Architect and produce a short report commenting on:

- whether it shows a fair representation of the visual impact that the road and development might have on the "Natural Aspect" of MHT land, including how long screening may take to mature;
- whether proposed landscaping is appropriate to local landscape character;
- whether there is anything else the developer might reasonably be required to do to limit the impact on MHT land; and
- whether the development site will be visible from the Malvern Hills (in the context of the surrounding land use) and possible effects on views/visual amenity of users of MHT land and on the local landscape (selected points only).

A revised report from Neil Furber, Chief Landscape Architect for PleydellSmithyman entitled 'Proposed Development of Land at Rose Farm, Malvern. Mitigating Landscaping to Guarlford Road' (PSL Ref:M16.164.R.001 REV C March 2018) was emailed to me on 22/03/18. My comments dealing with the four bullet points outlined above are as follows.

1. **<u>Does the report show a fair representation of the visual impact that the road and development might have on the "Natural Aspect" of MHT land, including how long screening may take to mature?</u>**

1. It is a feature of all the photomontages produced that the proposed development itself is not shown in the future views with landscaping mitigation at 10-20 years growth. It is understood that this is because the parameters for the development have not yet been agreed and therefore any images depicting development could be misleading. This absence of wireframe images does not aid analysis but the report does make an assumption that the development will not comprise built form above two storeys in height.

2. In my part 1 advice dated 4th September 2017 I commented on the fact that all photomontages depicting future views did so in summer conditions with

vegetation in full leaf. In some of the views shown (particularly from close range – viewpoints 2a and 2b) the proposed 10m wide screen is shown to provide a dense screen that would effectively block views of all development. It would be reasonably safe to assume that, 20 years after planting, a 10 m wide belt of woodland planting, comprising a varied and suitable mix of native broadleaved and evergreen species, would indeed provide such a reasonably dense screen to development in close-in views during summer conditions. No winter views of the proposed development have been submitted in the mitigation report since the Landscape Architects did not receive instruction to do so (it should be noted that leaf cover can be absent for up to six months of the year). However, the comparison images provided in the latest mitigation report, showing summer and winter views of a semi-mature 10m wide planting belt, do illustrate the obvious point: that screening is much less effective in winter. Users of MHT land close by would, therefore, be likely to have filtered views of the proposed development when leaves are not present but I agree that the vegetation proposed would be likely to filter those views to a significant extent.

3. On this point It should be noted, in addition, that a considerable amount of vegetation currently borders the ditch which runs parallel with the Guarlford Road to the south of the site. Some of this vegetation is mature and includes Oak, Ash and Willow trees. This vegetation already serves to provide variably filtered views of the proposed site, even in winter conditions. In places this extant corridor of vegetation is already up to 10 m wide (see image 1). It is expected that the proposed woodland planting would be contiguous with this vegetated corridor and could thus create a much wider corridor of up to c. 20m width in places.

Image 1 – a view showing width of extant vegetation bordering ditch to the south of the proposed development site, looking west

4. Different trees obviously grow at different rates and the rate of growth of all trees will vary depending on ground conditions, weather, tolerance to shade and competition etc. The height of a tree when planted will also clearly have a bearing on its height over a period of time, albeit that younger trees often 'catch-up'. Without knowing the details of ground conditions and what is to be planted it is difficult to say whether the heights of trees depicted in the mitigation images is accurate. However, many native species would be likely to reach 7-8m (approximate ridge height of a two storey house) within 20 years, though some species such as oak may take longer. I note that heights of vegetation depicted in viewpoints 2a and 3a have been reduced a little from earlier versions.

5. Viewpoint 4 (Sheet 10 in the mitigation report) from Chance Lane does not show a future view 10-20 years after mitigating planting. It is understood that this is because there is an option here of either extending the proposed 10m woodland planting belt to cover this SE part of the site or to leave the view open. The effects of the proposed development in this view are alluded to below.

Is the proposed landscaping appropriate to landscape character?

6. In my part 1 advice dated 4th September 2017 I suggested that the developer's landscape consultants could explain why the proposed 10m screen of planting along the south of the site (to the Guarlford Road) is considered appropriate in the local landscape. The REV B mitigation report does this only through a very brief reference to the fact that the published landscape character assessment refers to

the **well wooded character** and **'irregular' woodland cover** of this Principal Timbered Farmlands Landscape Character Type.

7. Worcestershire County Council's Information Sheet for the Principal Timbered Farmlands (file:///C:/Users/Admin/Downloads/landscape_types_principal_timbered_farmlands.pdf) makes it clear that the unifying presence of tree cover is key to this landscape type. Field boundaries are traditionally comprised of hedgerows with standards (often oak) allowing filtered views whilst linear tree cover associated with water courses is also characteristic.

8. New woodland planting is clearly consistent with the character of the Principal Timbered Farmlands. Furthermore, it is also recognised that further east along the Guarlford Road hedge boundaries have sometimes 'grown out' rather than displaying the classic 'hedgerow with standards' form. However, it is not considered that mitigation of a formalised, rectilinear planting scheme of 10m width is particularly appropriate or consistent with a landscape guideline at county level which 'encourages the planting of new woodlands, reflecting the scale, shape and composition of the existing ancient woodland character'. It seems clear that the function of the proposed planting is, first and foremost, to screen development, rather than to respond closely to landscape character. That said, the mitigation report's suggestion that the proposed planting could be made more irregular in shape and increased in width in places would be helpful. I believe that a planting width of 10m should be regarded as a minimum requirement. As referenced in paragraph 3, the positioning of new planting alongside that which is already present to the south of the site would also create a broader swath of vegetation which might be likely to accord more closely to landscape character.

Is there anything else the developer might reasonably be required to do to limit the impact on MHT land?

Whether the development site will be visible from the hills (in the context of the surrounding land use) and possible effects on views/visual amenity of users of MHT land and on the local landscape (selected points only).

9. A full Landscape and Visual Impact Assessment (LVIA) carried out in accordance with published guidance would normally be used to identify and assess the levels of effects of change arising from a proposed development on views and visual amenity (as well as on landscape character). An LVIA has not been requested or carried out at this time. However, this report briefly considers LVIA principles at a high level to help provide an indication of the likely range of effects on views and the visual amenity of users (hereafter referred to as ‘receptors’) of some MHT land. The LVIA process involves assessing the **sensitivity of each receptor** and the **magnitude of change** arising from the proposed development. The results of these assessments are then combined to give an overall level **of visual effects**.[1] Tables of criteria and matrices that have been used to help reach thee judgements are provided in Annex A. It must be stressed that the indicative

[1] In development subject to an Environmental Impact Assessment (likely to be the case for the proposed development) the **significance** of these effects must also be established. I have not considered significance in this report.

conclusions drawn from this assessment are in no way a substitute for the findings of a full LVIA.

10. Receptors on the Malvern Hills, for example, on Worcestershire Beacon, looking out over the proposed development site are judged to be **Highly Sensitive**. This high level of sensitivity stems from the fact that the receptors are within one of the country's premier landscapes (the Malvern Hills AONB), the views afforded to those receptors are of an outstanding scenic quality and, finally, because the enjoyment of the landscape and those views is a primary reason for the visit. In terms of the magnitude of effect it is judged that the proposed development would be likely to have a **Moderate Adverse** effect in those views. This judgement is reached because, whilst the proposed development site occupies a modest portion in the mid ground of the extensive panoramic views on offer, it would cause a noticeable deterioration in the views, causing a change from open agricultural land to residential development and an extension of the town into open countryside which must be considered to be permanent and irreversible. Using the matrix provided at Annex A the combination of a **Very High** sensitivity of receptor and a **Moderate** level of magnitude of effect suggests that the Overall level of Visual Effects would be **Moderate to Major**. In my opinion the effects would be closer to moderate than to major, in respect of day time views.[2]

11. Some mitigation of the impact of the proposed development in this view could be achieved by planting new vegetation, particularly large trees, in a broadly north-south orientation across the site including at its western edge. Mature trees on site and at its boundaries should also be retained. These measures would help to break up built development on the site and to create a more graded transition from the town to the countryside beyond. The mitigation report refers to the importance of such green infrastructure corridors but states that the location and design of these cannot be provided at this time, needing to be subject to a detailed constraints analysis and master-planning exercise. Such landscaping may help to reduce the overall level of visual effects 20 years on from planting but would not alter the fact that a large agricultural field had been converted to housing. The density of new housing is also a factor in views and a less dense development would be likely to assist in minimising the effects of development on the view.

12. The overall level of visual effects of the proposed development on the views and visual amenity of receptors on MHT land surrounding and looking across the site is likely to be at least the same **Moderate to Major** level, if not higher. Receptors on this land (for example on the Guarlford verges and Jackpits Lane) are judged to be of **High or Medium to High Sensitivity**. This is a lower level of sensitivity than for receptors on the Malvern Hills and reflects the fact that the levels of landscape value are slightly lower than in the nationally designated AONB and because the views themselves are of a lower scenic quality. In addition, receptors are more likely to be local residents with the views themselves not necessarily forming a primary part of the reason for people's visits. However, levels of receptor sensitivity still reflect the scenic beauty of the area and the fact that

[2] Night time views/effects arising from lighting have not been considered.

receptors such as pedestrian users enjoy open access on these areas. Within this range, levels of landscape receptor sensitivity are likely to be highest where receptors enjoy open views across the site to the Malvern Hills, for example, from Chance Lane (viewpoint 4 in the mitigation report). It should also be noted that for those approaching the town on the Guarlford Road this location also serves as a key gateway to Malvern and this function raises the level of visual receptor sensitivity.

13. In terms of the magnitude of effect it is judged that the proposed development would be likely to have a **Large – Moderate to Large Adverse effect** in those views. As with levels of sensitivity, magnitude of effect is likely to be highest from locations like Viewpoint 4 where receptors currently enjoy an open view across the site. From this viewpoint effects could even be rated as **Very Large Adverse** since the proposed development would clearly have a very significant effect on the foreground of the view, changing it from arable to dense built form. Depending on the positioning and design of housing it is possible that built form, including street lighting, could break the skyline in this view. Alternatively, it may be that the ridgeline of the Hills would still be visible in the backdrop. It is fair to recognise that there are a limited number of very open views of this nature looking towards the Hills from Chance Lane, with views further to the north of the lane being obscured by housing or largely filtered through a significant hedgerow containing mature standards. The mitigation report also observes that the currently open view from viewpoint 4 is susceptible to being blocked by planting on land in the curtilage of one of the residential properties. Using the matrix provided at Annex A the combination of a **High or Medium/High Sensitivity** of receptor and a **Large – Moderate/Large** magnitude of effect suggests that the Overall level of Visual Effects would be **Moderate** - **Moderate to Major**.

14. Given the very close proximity of the proposed development site to surrounding MHT land surrounding, it could be argued that the magnitude of effect on local receptors should be higher than those indicated above. In my opinion they are not likely to be so, for two main reasons. Firstly, whilst variable, built form is already present in many current views from neighbouring MHT land. This includes residential development on Chance Lane and Hall Green which can impart a domestic component to views, including some filtered views looking across the site from the verges by Guarlford Road. It also includes the detached house and garage at Rose Cottage, which, though rural in feel, still introduces an element of built form in the foreground of the views to the hills from the East, alongside built form to the west of the development site which is present in the same view (see images 2, 3 and 4).

Image 2 – view of proposed development site from Chance Lane showing Rose Cottage and its garage jutting out into view and built form behind

Image 3 – glimpsed view through hedge to Hall Green housing, from Guarlford Road verge

Image 4 – view across proposed development site from Jackpits lane to residential housing along Chance Lane

15. The second main reason why the magnitude of effect on local receptors is not higher concerns existing vegetation. The presence of vegetation to the south of the site has already been referred to in paragraphs 2-4 above (see images 5 and 6). To the north and east the site is bordered by mature hedgerow networks, sections of which have grown out and which contain significant numbers of mature trees. Whilst not complete or forming impenetrable screens these boundaries do serve to filter views through to the proposed development site.

16. That said, it must be noted that to a greater or lesser extent significant sections of all hedgerow boundaries surrounding the site to the north, east and south are underpinned by wet or boggy ground. This sometimes gives rise to sprawling vegetation including willow and poplar and to significant amounts of ivy cover, both of which contribute to current screening. Willow and poplar can be relatively short-lived and trees such as oak and ash growing in seasonally wet ground may be more susceptible to fungal diseases and early demise. Therefore, the extent to which this vegetation can be relied on to continue to mitigate the visual effects of the proposed development in the future must be considered.

Image 5 – view towards proposed development site across vegetated ditch, from Guarlford Road verge, note levels of Ivy contributing to screening

Image 6 - view towards proposed development site across vegetated ditch, from Guarlford Road verge (Rose Cottage and garage just behind hedge)

17. The effects of the proposed development are likely to be greatest during the construction phase and in the early years, before mitigating planting has grown and when the noise and disturbance associated with building activity will be considerable. Such issues of noise and disturbance are of course highly germane to the quality of a recreational experience and should be given due consideration alongside effects on views and visual amenity.

18. The mitigation report indicates an intention to in-fill the northern hedgerow boundary of the site with native shrub species and to plant occasional standard trees including oak and field maple. This would help to limit visual effects further from Jackpit Lane and would be appropriate to local landscape character. Users of this lane currently experience limited and heavily filtered views into the proposed development site because of the density and maturity of the vegetation to the south of the lane (though see para 17 above). The presence of close boarded fencing and privet hedging to the north of the lane create something of a corridor effect for the user (see image 7) with this fencing and the adjoining housing at Hall lane reducing the sense of rurality.

Image 7 – view from Jackpits Lane looking north east (proposed development site to right behind hedge)

19. The mitigation report does not mention the desirability of gapping up the hedgerow to the east of the site along Chance Lane, perhaps because this appears to be on MHT land. Nevertheless, gapping up and introducing a small number of new standards in this hedgerow would be characteristic and would further filter views into the site, these already being limited, It would also help to provide some succession to the mature oak trees in this boundary (see image 8). The proposed woodland planting to the south and potentially the south east of the site would, overtime, clearly block views of the development in summer conditions and would help to significantly filter views in winter conditions. On-going management of all ditch side vegetation is likely to be needed to ensure it plays a long-term role in filtering views, as well as maximising its function and value to wildlife.

Image 8 – showing mature oak trees along part of Chance Lane, note presence of residential development in locality

20. The mitigation report provides some evidence of highways works that would be required in relation to the proposed development. For example, we know that highway standards would require the proposed access road to be 5.5m in width with an additional 2m of pavement on either side. Visibility splays of 2.4m to a distance of 43m are also specified alongside a new pavement to be built along the west of Chances Lane to its junction with the Guarlford Road. Certain details are not specified in the mitigation report and will be dictated by the Highways Authority. This includes materials – though these are presumed to be concrete and tarmac - and the exact nature and number of roadside signs. The height of lighting columns is also not specified. A revised photomontage of the proposed access road is not provided in the mitigation report since it is assumed by the author that an assessment of it can be provided on site, being similar in nature and width to the adjacent Chance Lane.

21. The verge widens considerably in the vicinity of the junction between Guarlford Road and Chance, Lane presenting as an attractive, broad area of open common land (see image 9). It is across this area of land that the access road to the site is proposed. Notwithstanding that this road will sometimes be read against the existing built form at the southern end of Chance Lane (as in image 9), the presence of a c.10m wide corridor fringed with some signage and lighting and used by a very substantial number of cars means that this element of the proposal will clearly have an adverse effect on landscape character and the visual amenity of the locality.

Image 9 – wide verge, proposed site of access road (close to house and parked car)

Paul Esrich CMLI

April 2018

Annex A – Tables of Criteria and Matrices for Visual Impact Assessment

Table 1: Criteria for Judging Levels of Visual Value

Level of Visual Value	Criteria
Very High	• Views from, or towards, designated landscapes and / or features of international and national importance e.g. World Heritage Sites, National Parks, AONBs, Registered Historic Parks and Gardens, Scheduled Monuments, Grade I or II* Listed Buildings etc.) especially where contributing to the significance of an asset / feature • View is of outstanding scenic beauty • View makes a highly important contribution to understanding of landscape function / contribution • Likely to be the subject of planning policy and / or guidance / protected views • Views from landscapes / viewpoints within highly popular visitor attractions / tourist destinations, and / or from national trails, used by very large numbers of people • Views with social / cultural / historic associations (e.g. in art and literature, or an historically-important vista over a battlefield) of international / national importance
High	• Views from within, or towards, designated landscapes and / or features of regional or countywide importance e.g. Areas of Great Landscape Value (AGLV), Country Parks, Conservation Areas, Grade II listed buildings, National Trust land etc., especially where contributing to the significance of an asset / feature • View is of high scenic beauty • View makes an important contribution to understanding of landscape function / contribution • Views from well-used and popular visitor attractions / tourist destinations, including long-distance / themed trails, Heritage Coasts, Public Open Spaces / Local Green Spaces, used by relatively large numbers of people • Views with social / cultural / historic associations of countywide importance • Views in which receptors have a proprietary interest, including people living in residential properties
Moderate	• Views from within, or towards, undesignated landscapes and / or features of local importance • View is of moderate scenic beauty • View makes a moderate contribution to understanding of landscape function / contribution • Views from locally-popular recreation areas / green open spaces / public rights of way, but not used by many visitors • Views with social / cultural / historic associations of local importance
Low	• Views from within, or towards, undesignated landscapes and / or features of site-wide importance • View is of low scenic beauty • View makes a very limited contribution to understanding of landscape function / contribution • Views from landscapes / viewpoints which are not particularly popular or recognised as being destinations in their own right, including infrequently used rights of way • Views with no social / cultural / historic associations
Very Low	• Views from, or towards, undesignated landscapes and / or features of no

	importance • View is of no scenic beauty - landscape may be permanently degraded

Table 2: Criteria for Judging Levels of Visual Receptors' Susceptibility to Change

Level of Susceptibility	Criteria
Very High	• Receptors (tourists / visitors) within, or looking towards, internationally- or nationally- designated landscapes, areas and features such as World Heritage Sites, National Parks, Areas of Outstanding Natural Beauty, Registered Historic Parks and Gardens, Scheduled Ancient Monuments, Grade I and II* listed buildings and other places where the landscape / feature is the main reason for the visit • People using national trails and other designated routes where the view is likely to be the focus of attention • Communities living in areas where the landscape setting makes a highly important contribution to visual amenity
High	• Receptors (tourists / visitors) within, or looking towards, landscapes, areas and features with regional / countywide designations e.g. Areas of Great Landscape Value (AGLV), Country Parks, Conservation Areas, Grade II listed buildings, National Trust land etc. and other places where the landscape / feature is part of the reason for the visit • People engaged in outdoor recreation e.g. walkers, riders, cyclists, boat users, motorists, whose attention may be focused on the landscape and / or particular views, and / or for whom the view is a factor in the enjoyment of the activity • People travelling through the landscape on roads, rail or other routes on recognised scenic routes or where there is a distinct awareness of views of their surroundings and their visual amenity • People living in residential properties
Moderate	• Receptors within, or looking towards, undesignated landscapes, areas and features of local importance, and in places where the landscape / feature is not necessarily part of the reason for the visit • People engaged in outdoor recreation whose attention is unlikely to be focused on the landscape and / or particular views, and / or for whom the view is not necessarily a factor in the enjoyment of the activity • People staying in hotels and healthcare institutions who are likely to appreciate and / or benefit from views of their surroundings • People working in premises where the views are likely to make an important contribution to the setting, and / or to the quality of working life
Low	• Receptors in commercial and industrial premises, schools, playing fields etc. where the view is not central to the use • People using main roads, rail corridors, infrequently used / inaccessible public rights of way and likely to be travelling for a purpose other than to enjoy the view
Very Low	• People moving past the view often at high speed (e.g. on motorways and main line railways) and with little or no focus on or interest in the landscape through which they are travelling

Table 3: Matrix for Evaluating Levels of Visual Receptor Sensitivity

		Level of Visual Susceptibility to Change				
		Very High	**High**	**Moderate**	**Low**	**Very Low**
Level of Visual Value	**Very High**	Very High	High to Very High	High	Medium to High	Medium
	High	High to Very High	High	Medium to High	Medium	Low to Medium
	Moderate	High	Medium to High	Medium	Low to Medium	Low
	Low	Medium to High	Medium	Low to Medium	Low	Very Low to Low
	Very Low	Medium	Low to Medium	Low	Very Low to Low	Very Low

Table 4: Criteria for Judging Levels of Magnitude of Effect (Views & Visual Amenity)

Level of Magnitude	Definition
Very Large Adverse	• Significant and substantial deterioration in, or a significant and substantial change to, a very large proportion of the existing view • Complete loss of, or substantial change to, site's visual function / contribution • The change may be noticeable over a large geographical area, or substantial over a more limited area • Development, or a large part of it, would be a dominant new component and / or focus in the view, and would have a strongly-defining influence on it • The duration of effect is considered permanent and is likely to be irreversible
Large Adverse	• Development would cause a highly noticeable deterioration in, or a highly noticeable change to, a large proportion of the existing view, or significant deterioration in or a significant change to a smaller proportion of the existing view • Noticeable loss of, or change to, site's visual function / contribution • Development, or a large part of it, would be a significant new component and / or focus in the view, and would have a defining influence on it • The duration of effect would be considered long-term / permanent and would be very difficult to reverse in practical terms
Moderate Adverse	• Development would cause a visible deterioration in, or change to, a large proportion of the existing view, or highly noticeable deterioration in, or change to, a smaller proportion of the existing view • Partial loss of, or change to, site's visual function / contribution • Development appears at odds with local landscape character and would form an apparent element within local views • The duration of effect would be considered long-term / permanent but is potentially reversible
Small Adverse	• Development would cause a small deterioration in, or change to, a large proportion of the existing view, or a visible deterioration in, or change to, a smaller proportion of the existing view • Small change to site's visual function / contribution • Development would form a minor constituent of the view, being partially-visible, or at a sufficient distance to be a limited component of a view • The duration of effect may be considered long-term / permanent but is easily reversible; or, the duration may be medium-term
Negligible Adverse	• Development would cause a barely-perceptible deterioration in, or change to, the existing view • Barely-perceptible change to site's visual function / contribution • The duration of effect may be considered temporary (i.e. short- or medium-term); if long-term, effects are easily reversible and this is likely to happen
Neutral	• No change to the existing view
Negligible Beneficial	• Development would result in a barely-discernible improvement in the existing view • Improvements are temporary (i.e. short- or medium-term)
Small Beneficial	• Development would result in a small improvement in the existing view • Improvements are medium- to long-term

Level of Magnitude	Definition
Moderate Beneficial	• Development would result in a noticeable improvement to a large proportion of the existing view, or locally-important improvement to a smaller proportion of the existing view • Improvements are long-term / permanent
Large Beneficial	• Development would result in an important improvement to a large proportion of the existing view, or significant improvement to a smaller proportion of the existing view • Improvements are long-term / permanent
Very Large Beneficial	• Development would result in a significant improvement to a large proportion of the existing view • Improvements are permanent

Table 5: Matrix for Determining Overall Levels of Visual Effects

NOTE 1: The level of Magnitude of Effect can be expressed as Adverse or Beneficial, and the overall Level of Effect can be expressed as Negative or Positive.

NOTE 2: If the Magnitude of Effect is Neutral (i.e. 'No Change'), all effects will be Neutral

		Sensitivity of Receptor				
		Very High	**High**	**Medium**	**Low**	**Very Low**
Level of Magnitude of Effect	**Very Large**	Substantial	Major	Moderate to Major	Moderate	Minor to Moderate
	Large	Major	Moderate to Major	Moderate	Minor to Moderate	Minor
	Moderate	Moderate to Major	Moderate	Moderate	Minor to Moderate	Minor
	Small	Moderate	Minor to Moderate	Minor to Moderate	Minor	Negligible to Minor
	Negligible	Minor to Moderate	Minor	Minor	Negligible to Minor	Negligible