



Landscape Response Note

May 2022

Land off Fryatts Way – Bexhill on Sea

Introduction

The following Note is provided as a response to the letter from East Sussex County Council (ESCC) to Rother District Council (RDC) dated 8 November 2021. The ESCC letter contains comments relating to landscape and visual matters and a planning recommendation to refuse the proposed development.

The following Note has been prepared by FPCR Environment and Design Ltd (FPCR) who are the landscape consultants for the project and prepared the Landscape and Visual Appraisal (LVA) that supported the outline planning application.

Planning Application and Proposed Development

The proposal is for up to 210 dwellings (including up to 30% affordable housing), introduction of structural planting and landscaping, informal public open space and children's play area, surface water flood mitigation, vehicular access point and associated ancillary works. All matters to be reserved with the exception of the main site access. Planning application reference: RR/2021/1656/P.

Landscape Response

The following responds to the specific landscape and visual matters raised in the correspondence referenced above (attached to this Note) and adopts the same number references below.

1. The proposed development and LVA reference relevant policies and sections of the NPPF. The proposed development accords with the NPPF and the particular paragraph referenced in respect of landscape and visual matters. Further references to relevant policies in the NPPF are included at paragraphs 3.1 – 3.6
2. No response required.
3. The ESCC correspondence confirms that the LVA provides an accurate description of the site and surrounding area in the context of published landscape character assessments.
The LVA does reference the topography of the site in relation to the surrounding area and the intrinsic characteristics of the existing site, principally at paragraphs 4.23 – 4.42; supported by the accompanying figures and photo viewpoints.
4. The topography does generally fall from east to west and from Fryatts Way towards the Golf Course and Broad Oak Park. However, it is relevant to note that the existing dwellings along Fryatts Way and the wider existing settlement area to the east sits

above and is more elevated than the site. This is also the position for existing housing to the south of the site and adjoining Broad Oak Park. These existing dwellings also sit above both the site and the Park.

The site is not prominent in the landscape or from the surrounding countryside. The combination of the local topography, surrounding mature woodland, trees and hedgerows and existing settlement on the higher ground provides a high degree of visual containment. This is also evident from Figure 6 of the LVA. The 'Visual Envelope' on Figure 6 demonstrates that the site is only visible in part from the immediately surrounding dwellings and from parts of the golf course and parts of Broad Oak Park. Any available views are also generally heavily restricted and/ or filtered and include other existing housing on the higher ground to the south and east of the site.

It is not a visually prominent site in the landscape or from the surrounding countryside.

The perceptual qualities of the site are considered as part of the LVA (see paragraph 4.41) and are appraised as part of the Landscape Value assessment. This includes consideration of tranquillity. This is then factored into the overall assessment of landscape effects as part of the landscape sensitivity judgement. Given the nature of the proposed development and the site and the scope of the LVA, any further 'exploration' of the perceptual qualities and local sense of place of the site is not necessary in this instance to be able to suitably and robustly appraise the landscape effects of the proposed development.

The character and quality of the site landscape has been assessed in accordance with the relevant guidelines (GLVIA3 – see LVA Chapter 2 for Methodology). This considers the nature and character of the site's immediate context; including the park and golf course.

The well treed boundaries both within and around the perimeter of the site will be conserved, managed and enhanced with new tree and hedgerow planting where appropriate.

5. The land between '*the edge of Bexhill and Little Common (which incorporates High Woods Golf Course, Broad Oak Park and the site area)*' is not a '*key gap defining the separation between the two settlements*'.

There is no defined or designated '*settlement gap*' or '*area of separation*' covering the site or this area of land and no study has been sourced that identifies this area of land as one of importance in terms of settlement separation.

Notwithstanding this, Bexhill and Little Common are already fully connected with no 'gap' or 'break' in the existing settlement areas.

Views between the site and existing settlement at Little Common is also very limited and there is no perceived vulnerability in respect of this matter.

The golf course and Broad Oak Park are well defined areas and the mature and well treed boundaries to the site and to these wider areas provide a series of robust landscape areas and boundaries within which the proposed development would occupy a relatively small proportion adjoining existing development.

In physical terms, whilst there is no separation between Bexhill and Little Common to the south of the A259, even with the proposed development in place it would not encroach any closer to Little Common than the existing residential area on the more elevated land immediately to the south of the site and Broad Oak Park (at Foxhill and Badgers Mount; off Deerswood Lane).

The attached Aerial Photographs with overlays of the proposed development detail the existing and proposed distances that exist to the north of the A259.

In relation to the character of the area, the site is located within the '*Bexhill urban area*' as defined with ESCC's own Landscape Character Assessment (updated 2016). This indicates in landscape character terms, that the site and its immediate context, including the golf course and Broad Oak Park, is considered to form part of the wider '*urban area*' and not the '*South Slopes of the High Weald*'. Whilst we recognise that the site, the park and the golf course are not built up, as is much of the wider '*Bexhill urban area*', we do concur with the ESCC Landscape Character Assessment, that the site (and the golf course and Broad Oak Park) does form part of the '*Bexhill urban area*' and not the '*South Slopes of the High Weald*'.

The ESCC Landscape Officer takes a different view to that of the ESCC Landscape Character Assessment.

6. We agree that there are views into the site from surrounding publicly accessible positions. These include from parts of the golf course and Broad Oak Park and these have been assessed within the LVA. It is also relevant to note that these views are, however, generally restricted and filtered (by intervening and boundary trees and planting) and there are very limited opportunities for any views towards the site from beyond these positions.
7. The conclusions of the LVA do reflect the level of effects noted; and at paragraph 7.7 the LVA concludes that the proposals will undoubtedly alter the character of the site through the loss of the open land. However, it also recognises that it will not be out of character or scale with its context; that it will be well contained; and that it will conserve and strengthen the existing framework of hedgerows and trees across the site. Thus, a longer term Moderate Adverse landscape effect, reflecting the GLVIA3 methodology is justified.
8. We disagree that the longer term visual effects upon users of the park and golf course will be significant. The filtered and contained nature of the existing views (even in Winter); the presence of other existing housing in these views, on higher ground; and the conservation and reinforcement of the existing boundary planting with new native trees and structure planting will reduce the visual effects over time.
9. The outline 'illustrative' scheme is based upon 210 dwellings (ie the maximum number) and is considered to be a reasonable and robust basis for the LVA. The Development Framework plan and DAS submitted as part of the planning application provide sufficient detail on the development parameters used for the assessment and can also be referenced to any future planning permission.

The LPA will also be able to ensure that the subsequent detailed proposals are broadly in accordance with the outline proposals and considered acceptable, as part of the reserved matters application process.

10. The site access and vehicle movements will not result in any notable change or effects on the character and amenity of the area. The LVA does consider the site access proposals (although not explicitly stated) and these will have a very limited effect in landscape and visual terms. The vehicle movements similarly will have a very limited effect in these terms.
11. The conclusion that the effect upon the countryside and the '*rural gap*' would be unacceptable is not substantiated, as addressed above. Similarly, the effect of the proposed development upon the '*tranquillity and visual qualities*' of the local area will not be significant and adverse.

The conclusion rightly acknowledges that the site is not widely visible in the local landscape, albeit that it alleges some significant yet unidentified local views.

Conclusion

The proposed development has been subject to a proportionate and robust landscape and visual appraisal process and this has included inputs to the design and layout of the scheme, from the outset of the project. The resultant proposals respond to the results of this process and encompass a characteristic and strong landscape and Green Infrastructure framework. The proposed development will result in some adverse landscape and visual effects yet overall these will be limited and localised and not unacceptable in these terms.

Attachments:

- **Green Infrastructure Masterplan (Dated May 2022)**
- **Aerial Photographs – with proposed development overlays**
- **East Sussex County Council letter to Rother District Council (dated 08 11 21)**

- **Green Infrastructure Masterplan (Dated May 2022)**

