Proposed residential development on Land off Cambridge Road, Stretham, East Cambridgeshire.

Application Ref: 24/01135/OUM

1.0 Introduction

Appointment

1.1. This report has been prepared by Alison Farmer Associates on behalf of East Cambridgeshire District Council. Work has included the review of the Landscape and Visual Impact Assessment (LVIA) for planning application 24/01135/OUM for 126 dwellings west of the A10, Stretham.

Scope of Review

- 1.2 This review considers the effects of the proposed development on the landscape including the settlement of Stretham. It has included desk-based review and has been informed by a site visit in January 2025.
- 1.3 The review has referred to documents associated with the planning application and in particular the LVIA, along with other background documents relevant to landscape matters. Comparison has also been made with earlier LVIA's associated with previously consented schemes on the same site.
- 1.4 Best practice guidance which has been referred to includes:
 - Guidance on Landscape and Visual Impact Assessment (GLVIA 3rd edition),
 - Landscape Institute Technical Guidance Note clarifying aspects of GLVIA (2024) and
 - An Approach to Landscape Character Assessment (Natural England 2014).
- 1.5 The latter guidance on landscape character assessment notes that settlement makes an important contribution to landscape character. Guidelines for Landscape and Visual Impact Assessment (GLVIA 3rd edition) highlights that Landscape and Visual Impact Assessment (LVIA) may require an understanding of settlement, including the context or setting, topography and historic patterns.
- 1.6 This report includes:
 - A review of the **planning policy and history** of the site including previous judgements regarding the site's capacity to accommodate development
 - A summary of the **current baseline**, including how it relates to the existing settlement
 - A description of the proposed development
 - A review of the Landscape and Visual Impact Assessment (LVIA)
 - Acceptability of the planning application relative to previous consented schemes
 - Conclusions
- 1.7 Where text is underlined in this report it is to provide emphasis.

2.0 Planning History of the Site

Existing National Policy

2.1 The National Planning Policy Framework (Dec 2024) sets out relevant policy in relation to landscape including Para 187 which states:

Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) <u>protecting and enhancing valued landscapes</u>, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) <u>recognising the intrinsic character and beauty of the countryside</u>, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.'

Local Plan Policy

- 2.2 East Cambridgeshire Local Plan April 2015 (Amended 2023) is the relevant Local Plan and contains policies relevant to landscape. These include landscape and settlement character (Policy ENV1). Paragraph 6.2.1 states that *'New development that is well designed and helps to sustain and create landscapes and townscapes with a strong sense of place and local identity is important.'* It also makes reference to landscape character assessment (including The Cambridgeshire Guidelines) and conservation area appraisals.
- 2.3 Policy ENV1 specifically states:

'Development proposals should demonstrate that their <u>location, scale, form,</u> design, materials, colour, <u>edge treatment and structural landscaping will create positive,</u> <u>complementary relationships with existing development</u> and will <u>protect, conserve</u>, and where possible <u>enhance</u>:

• The pattern of distinctive historic and traditional landscape features, such as watercourses, <u>characteristic vegetation</u>, individual and woodland trees, <u>field patterns</u>, hedgerows and walls, and their function as ecological corridors for wildlife dispersal.

• <u>The settlement edge, space between settlements, and their wider landscape</u> <u>setting.</u>

• Visually sensitive natural and man-made skylines, hillsides and geological features.

• Key views into and out of settlements; this includes quintessential views of Ely Cathedral and the setting of the City as a historic 'isle' settlement close to the fen edge and the valley of the River Great Ouse.

- The unspoilt nature and tranquility of the area.
- Public amenity and access; and
- Nocturnal character of rural areas free from light pollution.'

- 2.4 Other relevant policy includes Policy HOU 4 on rural exception sites. This policy sets out that 'No significant harm would be caused to the character or setting of the settlement and the surrounding countryside.'
- 2.5 Policy GROWTH 2 on locational strategy is also relevant as it establishes that development should not result in *'significant adverse impacts'* and that development seeks compliance with other relevant Local Plan policies.

Planning History

2.6 Table 1 below sets out the planning history relevant to the site.

Document and Date	Comment		
Planning Application 23/0006/REFAPP 19 dwellings	Refused by LPA on three grounds. The second reason for refusal related to landscape: 'The site sits outside of the development envelope of Stretham where buildings are looser knit and as such the introduction of a terrace of properties in this location would fail to complement and enhance the local distinctiveness of the area, contrary to policies ENV 1 and ENV 2 and paragraph 130 of the NPPF.'		
Planning appeal for 19 dwellings	Scheme approved Inspector asked if the layout and scale of the development was compatible with the character and appearance of the area (para 21 Inspector's Report). He concluded at para 19: 'Noting the wider character of the area, the development of the site as suggested on the illustrative plans, with a mix of frontage development following the rhythm and pattern of closely grouped development along the A10, with a looser form of development to the rear would respect the density and character of the surrounding area, providing complementary relationships with the existing development.'		
Planning Application 23/00712/OUM 38 dwellings	Officer's report acknowledged weight to be given to past appeal decision that the development and frontage layout was acceptable. Officer accepted the findings of the associated LVIA which concluded that the effects of the proposed development were adverse but not significant. The LPA concluded that the effects on the local distinctive character were acceptable. The layout of this development introduced the concept of in-depth development on the site.		
Planning Application 23/01338/OUM 83 dwellings	Officer's report at para 7.29 highlighted the previous decision associated with the 38 dwelling scheme (which had the same indicative frontage design as the 19 dwellings scheme), and therefore did not warrant sufficient grounds to refuse the application. It went on to consider that the same conclusions could be drawn for the current proposals. However, it did note the scheme for 83 dwellings occupied a larger area, utilising a deeper area of the agricultural field, and extended further into open countryside. It went on to concur with the findings of the LVIA that the effects of the development would be on the cusp of significance on completion and that mitigation planting would reduce effects to negligible to minor in the longer term.		

Table 1: History of Planning Assessments and Judgements

Planning Application 24/01135/OUM 126 dwellings	Current application – the subject of this review.

3.0 The Site and Context - Understanding the Baseline

Overview

- 3.1 The site sits outside of the development envelope of Stretham to the southwest of the village. It comprises a single arable field to the west of Cambridge Road (A10). The height of the road is c.7m AOD, with the land immediately adjacent to the road and within the site siting slightly lower at c. 6.5m AOD. The lowest part of the site is in the northeast dropping to around c.6m AOD and the land gradually rises across the site to the northwest reaching c.7.5m AOD in the northwest corner (Drawing Number 90709e-01 of the Flood Risk Assessment). As is typical in the fenland landscape the topography of the area, whilst relatively flat, expresses some subtle variation. Land to the north of the site and north of the Wilburton Road comprises more pronounced slopes of the wider fen island known as the Isle of Ely which are readily perceived.
- 3.2 Stretham is located at the southeastern corner of the Isle of Ely in an elevated position overlooking low-lying fenland to the south and east. It forms one of a number of villages located on the Isle. The River Great Ouse flows approximately 1.5km to the south and is joined by the River Cam.
- 3.3 The Design and Access Statement accompanying the planning application sets out the historical development of the village indicating that its greatest period of growth was between 1926-1978 and especially following the construction of the A10 bypass to the west of the village. Areas of recent development are shown in section 2.0 and include Meadow Farm (5 dwellings) to the southwest of the village and Manor Farm (50 dwellings) to the southeast of the village. Linear development has occurred along the A10 south of the junction with Wilburton Road.
- 3.4 The historic core of Stretham village is a Conservation Area and sits predominately on land between the 10 and 15m contour. As the village has expanded, new development has encroached onto lower lying land, although the perception of the village sitting on the steeper slopes of the island above the fens is still discernible. To the southwest, the topography of the island is less pronounced forming lower and flatter land before it rises again towards the village of Wilburton.
- 3.5 Immediately south of the village there are small paddocks which form an important interface between the village and wider arable fenland. These paddocks, which are defined by mature hedgerows and trees, form a layering of vegetation which softens the build edge of the settlement. Beyond, the wider farmed fenland comprises larger scale fields which are often weakly defined by gappy hedgerows and scrub along drainage ditches.

Existing LCAs

3.6 The site is located within **The Fens National Character Area** (NCA). The LVIA makes reference to the NCA noting key characteristics and opportunities. However, the LVIA does not refer to text on settlements in particular that settlement pattern reflects settlement history and past responses to the location of dry land - the more extensive and older settlements being located on clay islands. The NCA highlights that 'visually intrusive development at settlement margins includes road schemes, power lines, industrial and residential construction and has impacted upon local character. There has been much building outside urban and fringe areas.'

The sensitive location of development on the fringes of settlement is therefore a relevant consideration for this character area. This is made explicit in the NCA text on landscape opportunities which state:

- 'Protect the distinctive character of settlements throughout the landscape and consider the visual impact of new development.....
- Make use of village and town design statements and conservation area appraisals for informing future development proposals. Encourage design that minimises visual impact on local landscapes.'
- 3.7 The LVIA also makes reference to the **Cambridgeshire Landscape Guidelines.** It places greatest weight on the Cambridgeshire Landscape Guidelines as being the most informative when considering the ability of the site to accommodate the proposed development. The Guidelines note that '*At the transition area between fen and island, the creation of small grass paddocks surrounded by thick hedges and trees or areas of woodland would reinforce the contrast and sense of moving from one landscape to another.' The Guidelines also highlight on page 19 that new development should 'reflect local landscape character, particularly in the treatment of edges of development, through the choice of appropriate native species, the pattern of woodland/copses/hedgerows, the use of the landscape form and avoidance of harsh lines.'*
- 3.8 The **East of England Typology** whilst not accompanied by detailed descriptive material provides a finer grained understanding of local character distinguishing between the fens (Planned Fen) and settled islands (Lowland Village Farmlands) as illustrated on Figure 1 below.
- 3.9 The contours shown on Figure 1 also illustrate the lower lying and less distinct topography in the vicinity of the site when compared to the steeper slopes of the island on which the historic settlements of both Stretham and Willburton are located.

The Conservation Area Appraisal

- 3.10 The Stretham Village Conservation Area Appraisal (CAA) was published in October 2009. It provides information on the character and special qualities of the village. It sets out that:
 - Stretham sits on the southern edge of the Isle of Ely on rising land
 - It was centred originally on the major route between Cambridge and Ely
 - The focus of the village is the church
 - The edge of the village merges into the surrounding agricultural fields
 - The roads and lanes in Stretham have for centuries formed the structure and framework of the village
 - When approached from Cambridge the settlement becomes evident by the presence of the church spire and the windmill.
- 3.11 In relation to the latter point this is also true when approach the village from the west.

4.0 The Proposed Development

- 4.1 The proposed development comprises 126 dwellings with the main access off Cambridge Road (A10). No other access points, either for vehicles or public rights of way, are proposed as part of the development.
- 4.2 The layout of the site is determined by a series of loop access roads which are described as forming a series or 'residential parcels'. Pedestrian linkage to the existing village would be via a proposed puffin crossing and central reservation across the A10. The A10 in the LVIA (para 2.1.1) is described as 'a very busy road'.
- 4.3 Table 2 sets out a comparison of the current application with that of the previously approved scheme. This highlights the quantum increase in the proposed scheme.

Feature	Previous scheme	Current application	Comparison
Area of site (hectares)	c. 4ha	c. 7.5ha	87% increase
Number of houses	83	126	52% increase
Parking spaces	187	252	35% increase
Visitor spaces	21	32	52% increase
Community orchard parking	8	8	same
Residential parcels	4	8	100% increase

Table 2: Comparison of current application with previously approved scheme

- 4.4 This scale of the current proposed development can also be compared with more recent housing schemes in Stretham most notably Manor Farm which comprises 50 dwellings along with a new village green (c.1.08ha) and new footpaths and cycleways. In developing the masterplan for the Manor Farm site, consideration was given to boundary treatment, connections, street hierarchy, open spaces, scale and density and integrating the old with the new. The result has been a successful extension to the village which reinforces sense of place.
- 4.5 The landscaping associated with the proposed planning application, whilst including suds, hedgerow and linear woodland, play area and community orchard, is located at the margins of the site. The pattern of structural planting follows that of the straight boundaries associated with the parcel of land.

5.0 LVIA Review

Approach

5.1 The LVIA generally follows best practice as set out in Guidelines for Landscape and Visual Impact Assessment (GLVIA 3rd edition). However, it does not make reference to the Landscape Institute Technical Guidance Note (LITGN-2024-01) which was published in August 2024 and provides important clarifications on the Guidance.

Illustrative material and viewpoint selection

- 5.2 The position of the site red line boundary shown on Figures 5 and 6 has become misaligned.
- 5.3 The viewpoint locations as set out on Figure 1 do not appear to be in the same location as those for the previous approved application for 83 dwellings, making comparisons between past judgements problematic.
- 5.4 Where viewpoint images are shown in Appendix 1 of the LVIA, the top image appears to be from the earlier LVIA for 83 dwellings (although the date is incorrect) and the bottom image for the current LVIA. In some instances, the images are not taken from the same position or same focal point, for example Viewpoint 1 and Viewpoint 9. Again this makes comparisons between the judgements reached in the earlier LVIA (for 83 dwellings) and current LVIA difficult.
- 5.5 Viewpoint 13 is a useful example. The location of Viewpoint 13 on Figure 1 is not the same as Viewpoint 13 in the earlier LVIA. On closer inspection of the image for Viewpoint 13, which is described as 'south of 45 Cambridge Road', is in fact taken from north of 45 Cambridge Road adjacent to the site. The correct image for Viewpoint 13 should be that shown for Viewpoint 17.
- 5.6 Viewpoints 15-21 (with the exception of viewpoint 17) are new and were not included in the LVIA for the 83 dwelling scheme. Images are so dark it is difficult to determine the extent to which proposed development would be visible.
- 5.7 There is a concentration of public rights of way to the north of Wilburton Road, on elevated land (including the historic routes of Parson's Drove and Mill Way). The Zone of Theoretical visibility ZTV on Figure 1 of the LVIA appears to show no visibility of the site from this area. However, site work undertaken as part of this review has shown that there are views southwards across the site. No viewpoints have been identified from these public rights of way and this is considered to be an important omission. Viewpoints from these locations, although similar to those from the Wilburton Road, would be elevated and would have a higher sensitivity, reflecting receptors focused on enjoyment of the countryside and where there are views to the church and windmill landmarks which reinforce perceptions of Stretham village and sense of place.
- 5.8 These errors and issues raise concerns regarding the reliability of the evidence presented and judgements reached regarding level of effect.

Susceptibility

- 5.9 Susceptibility is defined in GLVIA as 'The ability of a defined landscape or visual receptor to accommodate the specific proposed development without undue negative consequences.'
- 5.10 At para 4.4 of the LVIA it states that the previous planning consents at this site demonstrate its (the site's) ability to accommodate residential development. Whilst this might be the case in general terms, table 2 above demonstrates that the level of development now proposed is of a different order to past consents. This matters because the scale of development is an important consideration when determining the susceptibility of a site to accommodate development and in determining the magnitude of effects.
- 5.11 Clarification on this is provided in the LI Technical Guidance Note at para 5(4) on page 12. It states that 'landscape susceptibility will vary with the type or nature of change.' This relates to the type of development (in this case housing) and the relative size of the development (i.e the difference between 19 or 126 houses or even 83 and 126 houses). It also sets out that the criteria used to judge susceptibility will be dependent upon the development type being considered and should be tailored to the project. It goes on to consider at para 5(6) the link between susceptibility and policy. Where policy refers to outcomes to be achieved, the susceptibility should reflect the likelihood that the proposed development may influence the intended policy outcome. In this case consideration is being given to the susceptibility of this site to housing development in the context of the village of Stretham and in relation to Policies ENV1, HOU 4 and GROWTH 2.
- 5.12 The methodology accompanying the LVIA defines the categories of susceptibility as follows:
 - Low susceptibility is defined as 'a landscape where receptors are likely to make a <u>minimal positive contribution</u> so that it <u>could accommodate the type of</u> <u>development</u> being proposed <u>without causing a detrimental change</u> to the baseline condition.'
 - **Medium susceptibility** is defined as 'a landscape where receptors are likely to make a moderately positive contribution so that it <u>could accommodate partial</u> <u>development or</u> there is <u>potential for effective mitigation to offset detrimental</u> <u>change</u> to the baseline condition.'
 - **High susceptibility** is defined as 'a landscape where Receptors are likely to make a highly positive contribution so that <u>it is unlikely that it could</u> <u>accommodate the type of development being proposed (even with mitigation)</u> and would cause a detrimental and residual change to the baseline condition.'
- 5.13 It is notable that none of these definitions make reference to scales of development.
- 5.14 The susceptibility of the landscape resource is determined in the LVIA for the National Character Area, Cambridgeshire Landscape Guidelines character area, and at a local level through the definition of a Local Landscape Character Area. The extent of the latter is defined in the LVIA (Figure 9) and appears similar to the zone of visual influence (Figure 8). It does not include the wider local setting including the rising land to the north and the village of Stretham. Given the proposed development is seen as an extension of the village, this is considered to be an omission. The settlement of Stretham and the fen island on which it sits are fundamental to an

understanding and appreciation of the character of the local area. In this regard the Local Landscape Type as defined in the East of England typology along with information in the Conservation Area appraisal would have provided a better understanding of local character and susceptibility.

- 5.15 Furthermore, susceptibility of the local landscape is judged in the LVIA to be Low to Medium. The same rating was also concluded for the earlier scheme for 83 dwellings. Given the proposed scheme is double the scale of the former scheme and that susceptibility should take account of the relative size of development, it is concluded that the LVIA has underestimated the susceptibility of the local landscape to the type of development now proposed.
- 5.16 As noted above, the current settlement of Stretham sits on more pronounced slopes to the northeast of the site and is fringed by small scale pastures. This would suggest that land which is open, low lying and which is physically separated from the existing village by the busy A10, would have a higher susceptibility to in depth development of the scale proposed.

Visual Effects

- 5.17 This review has compared the judgements made in relation to viewpoints for the current scheme (126 dwellings) and earlier permitted scheme (83 dwellings).
- 5.18 It is noted that the LVIA for the current application makes some adjustments to the susceptibility of visual receptors for viewpoints 1, 2 and 3 increasing it from Low (for the 83 dwelling scheme) to Medium (for the current scheme). In contrast the Visual Susceptibility for Viewpoints 6, 8 and 9 has been reduced from Low-Medium and Medium (for the 83 dwellings scheme) to Low (for the current scheme). No explanation is given for these changes. For viewpoints 6,8 and 9 this results in a reduced sensitivity from Medium to Low.
- 5.19 Similarly, a comparison of the judgements made for each of the viewpoints indicates that for viewpoints 1 and 2 effects would increase in the long term from Negligible (for the 83 dwellings scheme) to Slight adverse for the current scheme. The reason for this is not clear.
- 5.20 The LVIA acknowledges for Viewpoints 9, 11, 12, 13 and 14, which are from the west, north and south, that effects would increase as a result of the current proposed scheme both during construction and on completion. The effects of the proposed development are judged to be Major or Moderate adverse (with the exception of Viewpoint 13, although the error associated with this is detailed above).
- 5.21 Reliance is placed on proposed mitigation planting to 'somewhat soften' views of houses. However, planting will be immature on completion, and the development will extend considerably further into open farmed fenland, compared to the previous consented scheme and the existing situation.
- 5.22 Similarly, in determining the effects in the long term (15 years post completion) the LVIA again relies on the mitigation planting to 'soften or screen' and 'predominately obscure views of built form'. This does not take into account the likely success or otherwise of the proposed mitigation to visually integrate development into existing landscape patterns. It is notable that the western half of the site is open with little discernible patterns of vegetation on the boundary or within the wider adjoining

landscape. Field boundaries are defined by ditches with only scrubby intermittent vegetation.

- 5.23 These issues can be illustrated with reference to Viewpoint 14. From this location the proposed development is likely to extend in front of the poplar trees which are seen just right of the centre of the image. This is a significant visual extension of development into this view which would be evident both during the day and at night.
- 5.24 The LVIA concludes that at worst the proposed development would cause a Slight Adverse change in the long term from some locations. This is defined as 'the proposals would cause a perceptible change to the view but would not materially affect the composition, the appreciation of the landscape character or the ability to take on or enjoy the view.'
- 5.25 However, this review has identified that the following changes are likely to be perceived:
 - When viewed from the north the development would be seen extending into open countryside on lower lying land, relative to the existing village.
 - The mitigation planting would not tie into existing vegetation structure given the openness of the landscape and would serve to create a harsh line of planting which would not create a characteristic edge to development, as seen on the existing margins of the village of Stretham.
 - The density and grain of development would not be in keeping with the linear development along the A10 and would not visually or physically relate to the existing village to the northeast.
 - In views from the west, the proposed development would appear to advance towards the viewer.
- 5.26 Overall, views which are from the north, south and west are likely to be most affected by the increased depth of development proposed on the site and nature of mitigation and structure planting proposed, when compared to previously consented schemes. In the longer term the effects on views are likely to be greater than predicted and more widespread, given the LVIA does not take account of elevated views to the north.

Landscape Effects

- 5.27 The viewpoint analysis helps to inform an understanding of landscape effects of the proposed development. As illustrated in the review of the viewpoints above, the LVIA relies heavily on the proposed mitigation in order to conclude that long term effects are not significant.
- 5.28 The current planning application extends housing development approximately 50% further west. This means that the perimeter planting extends beyond existing vegetation in the surrounding landscape and does not tie into other hedgerows simply because the fieldscape is predominately defined by ditches and is more open. By focusing mitigation planting within the site and around the perimeter, a harsher vegetated line would result, it is also noted that this mitigation planting will include a high percentage of evergreen species (para 6.6.2). On this basis the proposed mitigation planting is considered to also give rise to adverse landscape effects and is

unlikely to emulate the overlapping vegetation and small scale paddocks typical of the settlement edge.

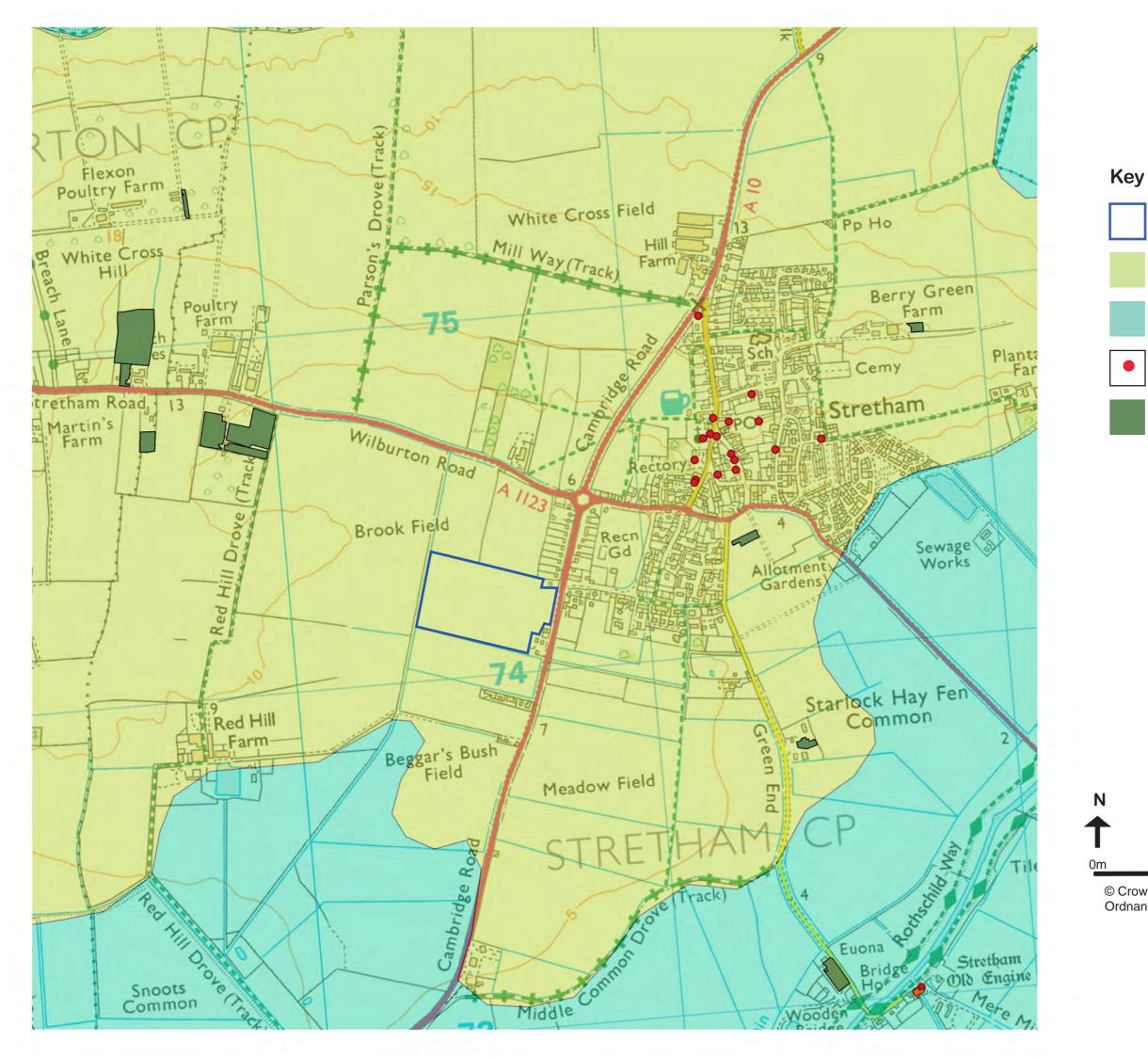
- 5.29 Furthermore, mitigation planting is unlikely to screen views of development altogether. As noted in para 5.7 above, the LVIA omits viewpoints from elevated locations on public rights of way to the north. The elevation of these views would also negate the ability of perimeter planting to reduce the characterising effects of in depth development in this location.
- 5.30 It is concluded that the proposed development would have an adverse characterising effect on the local landscape altering perceptions of settlement pattern on the fen islands and creating an urban extension which poorly relates to the existing settlement.

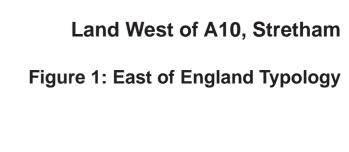
6.0 Acceptability of Planning Application Relative to Previously Consented Schemes

- 6.1 In earlier consented schemes effects were considered to be acceptable where the development formed linear infill along the A10. Furthermore, the scheme for 83 dwellings, whilst creating in depth development on the site, included mitigation planting which tied into the existing hedgerow patterns both on the site and in the wider landscape to the north.
- 6.2 The current application by comparison is a c. 87% increase in development area and c. 46.5% increase in dwellings which would physically extend into wider countryside. By its very scale and location it is more difficult to mitigate, such that the proposed mitigation itself has characterising effects. This coupled with the location of the site away from the main village, separated by the busy A10 and on less distinct lower lying land, would result in adverse effects on perceived settlement pattern and landscape character.
- 6.3 These are material differences between the current application and previously consented schemes. It is concluded that the LVIA for the proposed scheme does not take these matters sufficiently into account when reaching judgements. The LVIA for 83 dwellings concluded landscape effects at a local scale would be Minor and would be 'on the cusp of significant' (para 7.1.1 of the relevant LVIA). The LVIA for the current scheme concluded that the landscape effects at a local scale would be Minor to Moderate but nevertheless it still concluded that the effects would be on the 'cusp of significant'.
- 6.4 For the reasons set out above, taking account the increased visibility from the north, effects of mitigation planting and degree of fit with local character and settlement pattern, it is considered that landscape effects would be greater than predicted and significant overall.

7.0 Conclusion

- 7.1 Overall it is considered that the LVIA has underestimated the effects of the proposed development. The proposed development would give rise to adverse effects which would be significant, by virtue of
 - its increased scale;
 - in-depth 'parcel' arrangement;
 - physical separation from the main village (located west of the busy A10);
 - lower elevation away from steeper slopes;
 - position within wider open fenland (where mitigation may also give rise to effects).
- 7.2 While the site could accept some housing development (such as linear development along the A10 or some in depth development), the proposed scheme would extend into open arable farmland, would relate poorly to the village of Stretham, and would influence perceptions regarding the form and character of the village and its relationship with the fen island. This is considered to be contrary to Local Plan policies ENV1, HOU 4 and GROWTH 2.







Traditional Orchards

500m

<u>1km</u>

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