

Date: 24 March 2021

Reference: 3652/20/FUL

Description: Hybrid application comprising full planning application for erection of 45 residential dwellings, formation of accesses, associated public open space, landscaping and infrastructure; and outline planning application for extra care facility for up to 60 units with all matters reserved, except means of access

Site Address: Land to the South of Plymouth Road, Tavistock,

This is an addendum to the original, Specialist Landscape comments, dated 26 January 2021, and is based upon an examination of the planning file and submitted plans and by study of G.I.S. and aerial imagery. A site visit took place on 18 March 2021.

Documents referred to:

- Site Plan – Extra Care, Boyle + Summers, PRT-BSL-ZZ-XX-DR-A-1510-PP, February 2021
- Illustrative Site Sections – Extra Care, Boyle + Summers, PRT-BSL-MP-ZZ-DR-A-5003-PP, February 2021
- Extra Care GA Plan – Lower Ground Floor, Boyle + Summers, PRT-BSL-EC-00-DR-A-30 01-PP, February 2021
- Extra Care GA Plan – Upper Ground Floor, Boyle + Summers, PRT-BSL-ZZ-01-DR-A-30 02-PP, February 2021
- Extra Care GA Plan – First Floor, Boyle + Summers, PRT-BSL-EC-02-DR-A-30 03-PP, February 2021
- Extra Care GA Plan – Second Floor, Boyle + Summers, PRT-BSL-EC-03-DR-A-30 04-PP, February 2021
- Extra Care GA Plan – Third Floor, Boyle + Summers, PRT-BSL-EC-04-DR-A-30 05-PP, February 2021

Officers have considered the additional information submitted to support the outline part of the hybrid application for an extra care facility for up to 60 units with all matters reserved, except means of access, and make the following, additional, Specialist Landscape comments.

Adopted JLP Policy TTV17 – Plymouth Road, Tavistock requires development to provide the following:

- The scale, density materials, design and southern extents of development should ensure that it is not overly prominent when viewed from the town and surrounding countryside (TTV17.1)
- High quality design including positive frontages onto the adjoining road network, especially the main road, marking the arrival into the town from the south east (TTV17.2).

The main focus of the site visit on 18 March was to establish what capacity the landscape has to accommodate the scale of building indicated for the extra care

home facility proposed for the south-east area of the application site, in conjunction with the 45 residential dwelling proposed for the rest of this part of the allocated TTV17 site.

Supporting text for TTV17 (provided by the Case Officer) confirms:

“5.90 This allocation supports balanced growth in Tavistock. The sites location on the eastern edge of the town means that it is the most suitable site for new employment-related uses as it benefits from the most convenient access to Plymouth and the major road network in the wider area. It also provides the opportunity to create a strong built frontage to the A386 as the main gateway to the town from the east.”

“5.91 The land to the north of the lane which bisects the allocation adjoins an existing commercial area on Plymouth Road and is suitable principally for new employment uses, predominantly Use Class B1. The land to the south of the lane which bisects the allocation is the most suitable for the housing...”

JLP SPD 7.7 states that *“In order to foster high quality development that respects, maintains, or enhances local landscape character and distinctiveness, all new development should consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting or enhancing local design characteristics and, wherever possible, using local materials. Planning applications should detail the measures taken to ensure the building design will be of a high standard, as well as include detail of layout alternatives together with justification of the selected option in relation to the landscape context.”*

The application site is land north of the lane, on the lower lying land that is adjacent to Plymouth Road. Officers note that the current Masterplan for this application clearly shows that development of both residential and the extra care facility will be set back from the main road, and therefore be partially screened by the retention of existing road side vegetation along Plymouth Road.

Whilst recognising that the masterplan layout diverges somewhat from the TTV17 policy expectation, which requires *‘High quality design including positive frontages onto the adjoining road network, especially the main road’*, Officers would support the approach of a green ‘buffer’ to the development, as it reflects the layout of residential areas on the opposite side of Plymouth Road, which have a wide landscaped area of grassland and trees between the main road and the residential distributor roads and housing. This creates a pleasant, relatively open space, including pedestrian circulation routes, on the main approach into Tavistock. The retention of established existing trees and hedgerows should be supported, provided that they are brought into active management to ensure their ongoing health, viability and amenity value. The proposed masterplan layout therefore reflects and enhances local design characteristics, and accords with adopted policy for DEV23 Landscape Character.

Officers are concerned that the development of the south-eastern area of the application site for such a large scale building will detrimentally alter this recognisable development pattern along Plymouth Road, by the introduction a large built form very close to the road on the very edge of the settlement. This will interrupt

the predominantly 'green' approach to the town, and the physical constraints of the site along with the scale of development proposed, will make it very difficult to effectively mitigate the visual effects of the proposals. For travellers heading north west into Tavistock along the road, the well treed and green scenery changes markedly on arrival at the commercial development area around Lidl, with relatively largescale development immediately adjacent to the highway. If the large, extra care facility is developed in the location indicated, it will be separate from, and will therefore have a poor visual (and physical) relationship with, the other existing commercial and employment development of a similar scale.

Based on the indicative plans, officers are also concerned that the scale and form of the extra care facility and the footprint required to provide 60 units is unacceptably large and overbearing for the location indicated. The cross sections shows that extensive earthworks will be required to accommodate the development within this part of the site, and that even with it being partially built into the slope, the height of the building is well in excess of the residential elements of the development, which sit in close proximity to it. The effect will be overbearing and very difficult to mitigate effectively in order to maintain a high level of residential amenity for the nearest dwelling plots. It is noted that the height will not exceed the ridgelines of the proposed, adjacent, Linden Homes development to the south of the lane, but Officers remain concerned about the potential detrimental effects on residential amenity here due to the scale and mass and the extensive roof area of the building proposed.

It is noted that the landscape appraisal at allocation stage made the recommendation of a 2 storey limit to development height across the allocation site. The proposals indicate that the extra care facility will require 4+ storey development to accommodate 60 units in this location, and whilst it is acknowledged that the extra care facility is proposed for a low-lying area of the site, the physical constraints of this part of the application site will significantly limit opportunities to mitigate the effects of the development effectively.

DEV23.7 states that development proposals should *"Avoid, mitigate, and where appropriate compensate, for any residual adverse effects and take opportunities to secure landscape character and visual enhancements."* The adopted JLP SPD 7.19 goes on to explain that *"Besides following the mitigation hierarchy, the LPAs expect applicants to maximise the benefits landscape can deliver to communities by ensuring the design of the site explores means of delivering enhancements to the local landscape character and visual amenity of the local area."*

For the reasons stated above, Officers do not believe that the extra care facility as described would be appropriate, or could be easily accommodated within this landscape. Furthermore, the submitted documents do not give sufficient information to convincingly explain how the scheme might deliver enhancements to local landscape character and visual amenity, in line with the expectations described in JLP SPD 7.19, and as set out in adopted policy DEV23.

This response is based upon an examination of the planning file and submitted plans and by study of G.I.S. and aerial imagery. A site visit has not been undertaken at this time.

In considering this application and assessing potential impacts of the development proposal against nationally protected landscapes, in addition to the Development Plan, the following legislation, policies and guidance have been considered:

- Section 85 of the Countryside and Rights of Way (CRoW) Act;
- Section 11 of the NPPF in particular paragraphs; 127 and 170, 172 & 173;
- The National Planning Practice Guidance (NPPG) particularly Section 8-036 to 8-043 on Landscape; and
- The Tamar Valley AONB Management Plan & Dartmoor National Park Management Plan and Annexes

Landscape Comments:

The application site forms the northern part of allocated site TTV17 – Plymouth Road Tavistock.

It is within the setting of Tamar Valley AONB / Dartmoor National Park

Landscape Character Area: River Tavy Middle Valley

Landscape Character Type: 3B: Lower rolling farmed and settled valley slopes

EN32 Landscape Impact Assessment of Potential Housing and Employment Sites Across the Thriving Towns and Villages, South Hams District Council, West Devon Borough Council, 2017.

As part of the consultation process for the Joint Local Plan, the councils undertook a landscape impact assessment of the sites considered for allocation at the Main Towns, Towns and Key Villages across the two council areas.

Site name: *Plymouth Road (At the time of the assessment, the reference for the allocation was Tavistock SH/WD: TTV22)*

Key Characteristics:

- *Strong field boundaries with robust hedgerows and treelines*
- *Open pastoral fields sloping up to the south, with the gradient increasing towards the southern boundary*
- *Elevated to the south with fine views over much of Tavistock and towards Dartmoor*

Relevant Tamar Valley AONB Special Qualities:

- *A landscape of high visual quality*

Value:

The Tamar Valley AONB lies on the immediate south west boundary, and Dartmoor National Park 1.5km to the east. As the site slopes away from the AONB the site makes a moderate contribution to its setting, principally in views towards the AONB from the north and west. The site also forms part of the setting of Dartmoor as part of the setting of the urban form of Tavistock which is clearly visible from the western side of the moor. There appear to be no other designations for biodiversity, and there is no public access to the site, however

a number of the hedgerow tree lines are protected by numerous TPOs. The World Heritage Site at Tavistock also denotes a significant historic value

Summary of Overall Character:

Several open fields on rising ground to the south of the town. There are strong visual relationships with the town and Dartmoor (albeit at a distance), with fine views from the more elevated southern end of the site across the town to the surrounding landscape. The current edge of the town has a significant visual impact on the site. Important boundary trees and hedgerows provide a strong framework to the site, with many protected by TPOs.

Sensitivities/ vulnerabilities:

- *Development extending on to higher ground could significantly alter the perception of Tavistock in its landscape setting.*
- *Dense development would create a harsh and visually prominent area of development in the context of the Tamar Valley AONB and in views from the National Park.*
- *Non-vernacular built form and materials could be visually prominent set above this area of the town*

Sensitivity analysis:

If development were to be promoted at this site, keeping it as low down the slope as possible would help to minimise wider landscape and visual impacts, and impacts upon the setting of Dartmoor and the AONB. Creating substantial areas of open space and strategic landscaping to the south would be an effective way of achieving this. In this sensitive landscape and historic setting, vernacular built form with traditional scale (for settlement outskirts – up to two storey), form and materials would help reduce visual impacts, with muted colours and avoiding visually prominent pale renders on the more elevated sections. Avoiding significant glazing on dwellings and minimising street lighting of the site would also help reduce wider impacts on protected landscapes.

This site would not be viewed as “major development” in **NPPF paragraph 172** terms, as the settlement at Tavistock provides a clear built context for development of this scale in this location.

The principle of the whether this site is able to accommodate some form of development is not in question, but the **Landscape Assessment contained in the Site Information Pack** gives clear guidance on the landscape and visibility issues that should be addressed in order for development to be appropriate for the site.

The Landscape Assessment for the whole allocation expects that any development on TTV17 should be kept ‘*as low down the slope as possibleto minimise wider landscape and visual impacts, and impacts upon the setting of Dartmoor and the AONB.*’ This application, for the northern part of the allocated site, is on the most low-lying part of the allocation, which reduces concerns about it having detrimental landscape and visual effects on the wider area, or on TV AONB or DNP.

The application on behalf of Baker Estates is for residential development, and includes an area of land subject of an outline planning application for an Extra Care Home (to be delivered by others) to the east of the access from Plymouth Road.

Landscape and Visual Appraisal, October 2020, Tyler Grange:

The LVA is noted. The methodology accords with best practice as described within the Guidelines for Landscape and Visual Impact Assessment, 3rd edition, published by the Landscape Institute and the Institute of Environmental Management and Assessment (GLVIA3). The findings of the LVA report are broadly appropriate, and I confirm that the landscape and visual effects of the proposal have been correctly identified, and that wider Landscape Character of the area will be conserved.

In relation to the TTV17 policy requirement for ‘a strategic landscaping buffer along the west side of the site’, I add a qualification to the following statement in para. 4.34, which reads:

The LVA has established that the site is not visible from public vantage points within the AONB, and that the western side of the site is not visible from the open countryside to the west as a result of the intervening topography, vegetation, built form adjoining the site and the strength of vegetation along the boundaries and within the site. As a result, there is no need for a strategic landscape buffer on the western side of the site.

This policy requirement relates to the whole of the TTV17 allocation, whereas the application site only occupies the northern part of TTV17. I would agree that the strategic landscape buffer is not required for this site, in this northern part of TTV17 but feel that the statement could be taken to apply to the whole allocation if this is not clearly stated. A strategic landscape buffer will be expected to the west of the remainder of TTV17 allocated area (Linden Homes site ref. 3614/18/OPA).

Masterplan (drawing ref. PRT 1501-PL), Boyle + Summers Ltd:

- There is no detail provided about the nature of the Extra Care Home facility, in terms of the scale, mass, and appearance of this proposal, and so it is not clear how 60 units will fit onto this site, nor how development will be accommodated in relation to the current levels. It would also be helpful to understand what the anticipated timeframe for its development is.
- The entrance to Extra Care Home facility: a new, building will have an impact on the main entrance to wider development site. If it is not developed in tandem with the residential elements of the site, any temporary treatment for this entrance zone should be designed to be a suitable ‘gateway’ to the development. The current information has little detail about this area.
- The main access road of the development loops around the site, and it is accepted that the development’s layout is largely determined by the landform and levels.
- The sloping landform also requires an extensive retaining feature through the middle of the site (E-W) to create level areas of developable land. This feature is explained in the DAS and Soft Landscape proposals as being a ‘*Rootlock vegetated wall or similar, seeded with Wildflower rich meadow grass*’. Other plans state ‘refer to Structural Engineers drawings’, which have not been provided.

The Rootlock website explains that the system is flexible, using a geotextile bag and locking plate arrangement, and can be used to build standard gravity walls in small applications up to 2.1m high, as well as reinforced structures that are 4m or more in height (which will be necessary in place on this site). It is designed to provide a permanent soft solution for vegetated walls and retaining structures that creates a ‘segmented’ wall face. The challenge will be to

establish full cover of appropriate vegetation. The Rootlock website suggests a range of alternatives for achieving vegetation cover, including the use of plug plants. The application proposal for wildflower rich meadow grass offers some biodiversity benefits, although the method of establishing this grass cover is not clear. There is an opportunity to establish a more diverse and locally appropriate native flora on this retaining feature, which should be explored, and the planting proposals must be robust because any failure to establish a good level of vegetation cover on the segmented surface could result in substantial lengths and heights of retaining features that will be visually unattractive for residents whose gardens back onto it.

- It is noted that this retaining feature is largely north-facing, which must be considered in relation to establishing a good level of vegetation cover. It is also noted that access to the retaining feature for future maintenance will be restricted by the 1.8m high, close boarded fence on plot boundaries on the top of the slope, and by raised planters) with native hedging at the base of the slope. (The raised planters are shown on the External Levels Strategy Plans, but no details have been provided for these features.) Maintenance and on-going management of this vegetated wall feature will require explanation.
- Flights of steps and footpath link from entrance to ECH facility, to the east of plots 1 and 21 (to the turning head on the estate road serving the upper level of housing): how will level changes between the ECH site, the path and the plots be dealt with? The treatment and maintenance arrangements of this areas should be explained. The soft landscape proposals show a Devon Hedgebank to the west of the path and steps – the soft landscape plans show the sloping areas as amenity lawn turf, but in effect they appear to be inaccessible spaces that would be impractical to mow / maintain. An alternative soft landscape treatment should be considered. No details are provided for the proposed path and steps, although it is noted that the Hard Landscape GA Plan labels this as a *footpath of black asphalt (to adoptable standards)*.
- Plots 40-45 are enclosed by the existing hedges of the smallest field, in the south-west of the site. Six large dwellings appears to be quite tight in this space, and it is not clear why plot 43 requires a separate vehicle access from the main part of the site, while the other 5 dwellings have a separate vehicle access from Brook Lane? I understand that the vehicle access is required through the hedge line to allow construction access from the main site rather than via Brook Lane. This could, however, be reinstated to leave just a pedestrian access through the hedge once built. If Plot 43 was omitted, it would allow more generous, outdoor, amenity space for the remaining 5 dwellings, which are substantial family homes.
- The main POS and LAP in the north-west of the site is designed around the main attenuation basin, which is quite an engineered landform. It is appreciated that the open space area is quite constrained by surrounding vegetation, but it would be visually improved if the slopes were more sympathetically profiled to look more natural in appearance. It is also noted that only two benches are proposed – one in the LAP and one other.

Tree Protection Plan (drawing ref. 05311.TPP.20.10.20), and Arboricultural Impact Assessment Report, Aspect Tree Consultancy:

It is noted that much of the existing vegetation around the boundaries of the application site is to be retained. The native trees and vegetation along Plymouth Road will have a small number of existing shrubs removed to accommodate the main access road. The existing hedges to the west and south of the site are retained, which is welcomed. There are two lengths of existing hedge within the site. The one around the smallest field is mostly retained, and the one dividing the two larger fields is partially retained, but will have two significant sections removed to accommodate the new estate road.

There will be significant level changes in the vicinity of retaining walls and retaining features, which are in close proximity to a number of the retained hedges and trees. The WDBC Tree Officer should be consulted on the suitability of the proposals in relation to existing trees.

Masterplan – Parking Layout (drawing ref. PRT 1504-PL), Boyle + Summers Ltd:

It is stated that the garages do not count towards the parking provision. It is a concern that, of the 45 dwellings proposed, 29 dwellings (64%) have tandem parking spaces. There do not appear to be any visitor parking spaces, and with such a reliance on tandem parking, on-street parking may become an issue across the development in future as a result of the current parking layout.

Masterplan – Boundary Treatments (drawing ref. PRT 1506-PL), Boyle + Summers Ltd

As previously noted, few details have been provided to illustrate the appearance of the proposed retaining structures and planters.

1.8m close boarded fences in a natural finish are widely used to divide plots. In a few locations, these side boundary fences will be visible to the wider street-scene, and it would be preferable to have a higher quality boundary treatment in these places. For example, a stone-faced wall, or part stone / part render, or even a combination of low stone wall, with CBF on top in a dark stain. The plots which have more publically visible CBF are:

- Plot 12 - west side
- Plot 32 – northern side boundary, which is parallel with main estate road.
- Plot 36 - rear boundary, adjacent to side of plot 35

External Levels Strategy Plan – sheets 1 & 2 (drawing ref. 1005 rev C), Sands Civil & Structural Chartered Engineers.

- The plans show indicative retaining walls in red, which – in a number of locations – are located between plots. These features do not appear on the Boundary Treatments plan, which shows 1.8m high CBF in most of the same locations. No details of the construction or appearance of these retaining walls have been given, even though they are likely to be visible features.
- The plans also indicate stone walls (max. 900mm) in the rear gardens of a number of plots. Details have not been provided of their appearance.
- As previously mentioned, no details have been provided of the pedestrian steps that will be required across the site.

- A raised planter is shown to the rear (eastern) boundary of plot 32, and plot 31, but there is no indication of any proposed planting on the soft landscape proposals plan.

Soft Landscape Proposals (drawing ref. 12508/P10 Rev C), Tyler Grange:

The landscape proposals are broadly appropriate within the main area of development, although it appears that opportunities to strengthen and enhance the existing site boundaries and areas around the POS, and other retained vegetation with additional planting have not been taken.

The DAS states: *'The prime objective of the design proposal for the public realm is to create an attractive, safe, and welcoming residential environment whilst integrating the development with the surrounding area and route network'*. A lot of emphasis is placed on the existing mature trees, as key features in the public realm, to achieve this objective. Apart from the 9 *POS/ Boundary Trees (Native)*, and 3 of the *Street Trees (Ornamental)*, all other tree planting appears to be on-plot. Wildflower rich meadow grass will be an attractive feature for the publically accessible areas if it is well-managed, and these areas could be further enhanced with native / naturalising bulb planting

It is not completely clear from the plans which of the new hedge planting and the Devon Hedgebanks is on-plot, and which is public realm landscape. It would be useful to have a plan that clearly indicates which areas of soft landscape are private and the responsibility of the residents, and which are public spaces maintained by a management company / others.

The on-going management proposals may contribute towards enhancing the existing vegetation features, but a LEMP has not yet been produced to confirm this.

The following points are noted:

- The Summary planting specifications are broadly acceptable.
- The plan illustrates *POS/ Boundary Trees (Native)* in nine locations. These are 3 no. QR, 5no. FS and 1no. AC (ACa on the schedule). The species selection and schedule information is acceptable.
- The plan illustrates *Street Trees (Ornamental)* in fifteen locations. These are 8no. SA, 4no. BJ and 3no. AC (ACs on the schedule). The species selection and schedule information is acceptable.
- The plan illustrates *Specimen Shrubs (Ornamental)* in a number of locations. A total of 11 symbols for this are shown: 6 are labelled AL, 4 are labelled MG, and 1 is labelled SN. Three species are listed in the Specimen Shrubs schedule, using the codes MG, MSC and SN – with no mention of AL, and no MSC labelled on the layout.
- The *Native hedge mix* and the *Grass mixes* are appropriate.
- Three species are listed under *Ornamental hedges* are acceptable, but it is not clear on the plan which species is intended for which sections of ornamental hedge (the schedule does not imply a mix of species is intended).
- *Ornamental shrubs* are proposed in limited locations on the plot frontages. The species are acceptable but detailed planting proposals will be required to confirm planting layout is appropriate.

- *Climbing plants* are proposed on the north side of the CBF at the top of the retained, vegetated wall. The species are all appropriate for a north-facing aspect.
- The remnant sections of hedge between plots 16 and 17, and between plots 26 and 27 appear to be used to divide the plots with adjacent areas shown as amenity turf, indicating that they will be part of the plot gardens. This is a concern, as such key existing landscape features should be managed as part of the public realm, to enhance biodiversity and to ensure that the existing trees and hedges are managed appropriately in perpetuity. Amenity lawn (turf) is not an appropriate grass treatment under the tree canopies in these locations.

Hard Landscape General Arrangement Plan (drawing ref. 12508/P11 Rev C), Tyler Grange:

- As with the Masterplan, this is a simple, graphical illustration of the proposed hard landscape layout. Whilst it includes a key and a description of the materials to be used, there are few other details to explain the appearance of the proposals.
- Other plans indicate that there are flights of steps on some of the footpaths around the site, but these have been omitted from the Hard Landscaping GA. Details of the steps should be included on this plan.

Summary:

These comments are focussed on the landscape and design elements of the proposal from a landscape design and landscape character perspective. Colleagues who specialise in Trees, Biodiversity and OSSR may wish to contribute comments on landscape design in relation to the proposed treatment and management of TPO trees, existing vegetation, play spaces and publically accessible areas of the site.

In summary, the landscape elements of the proposals are a broadly appropriate response to the site's constraints and opportunities, although there are some issues which require further explanation or details, and a few concerns that have been raised. These issues require clarification before full support can be given to the scheme. The detailed planting proposals could be secured by condition, if Officers are minded to approve the application as presented.

Amanda Urmson – Specialist (Landscape) - Natural Environment