

OBSERVATIONS ON DRAFT TRURO THREEMILESTONE AREA ACTION PLAN (TTAAP 2008)

CHAPTER 5 DEVELOPMENT PRINCIPLES: GREEN INFRASTRUCTURE

The production of a green infrastructure plan, which is to be adopted as a supplementary planning document, is supported. As outlined under paragraph 5.16 a characteristic of Truro is its “close relationship between town and country”. The south coast central section of the Cornwall Area of Outstanding Natural Beauty lies to the south of the city and forms an important part of Truro’s hinterland.

The landscape character of the Fal ria forms a distinctive landscape in this area. In the report “The Cornish Landscape”¹ a description of the landscape character in this part of the AONB near Truro is provided:

“The rounded ridges between the creeks have not been developed for settlements and are characterised by areas of medium scale field pattern, reflecting its origins of enclosure in medieval times. There are scattered farming settlements through these areas. Reorganisation of the field boundaries during the 18th and 19th century, and more recent hedgerow removal has occurred, giving rise to a greater sense of openness, particularly nearer the larger settlement of Truro and Falmouth. This pattern is reinforced by area of straight sided fields formed by recent enclosure of heath and downland.....”

A new resource the Cornwall and Isles of Scilly Landscape Study 2005-2007² is now available which complements the work on the Cornish Landscape and provides more detailed landscape descriptions for the Fal ria. Under the heading “visions and objectives” it states the following:

This is a stunning visual landscape dominated by the Fal estuary, its creeks and its side rivers. Even though the area encompasses the busy towns of Truro, Falmouth and Penryn with their associated villages and housing developments, the creeks appear to maintain their air of tranquillity, a sense that is equally found in the enclosed valleys of the upper sections of the rivers. The objective must be to maintain this natural beauty whilst accommodating development and increased recreational use This is a quality rural landscape, which is distinctive and is in close proximity to Truro; a major Cornish town which will accommodate a significant increase in the number of residents

¹ The Cornish Landscape: Countryside Commission 1997 - CCP520

² Available on www.cornwalllandscapes.org.uk

The Cornwall AONB Management Plan³ Policy VibL5 is to:

“Seek an increase in expenditure on rights of way management within the AONB, ensuring furniture and infrastructure reflects the characteristics of the local areas of the AONB”

Supporting paragraph 5.4.10 states that:

“The numbers of people using the rights of way network make it the primary resource with which to encourage access to, and raise awareness of, the AONB”.

Chapter 5 of the Truro and Threemilestone AAP sets down development principles, which includes “green infrastructure, local food production and access to the countryside”. A green infrastructure plan, which is intended to be adopted as a supplementary document, is to be produced.

Chapter 10 of the Truro and Threemilestone AAP outlines the key attributes and issues relating to Higher Newham and Tolgarrick Farm.

Under paragraph 10.6 listed are the particular issues to be addressed for the areas, which include:

“Building upon opportunities to link and create green infrastructure including achieving a net biodiversity gain and increasing access to the countryside”.

Higher Newham is adjacent to the south coast central section of the Cornwall Area of Outstanding Natural Beauty and could potentially have an important role in linking town with country. This opportunity need to be fully explored in the green infrastructure plan.

³ A Management Plan for Cornwall Area of Outstanding Natural Beauty 2004-2009

OBSERVATIONS ON DRAFT TRURO THREEMILESTONE AREA ACTION PLAN (TTAAP 2008)
CHAPTER 10: HIGHER NEWHAM AND TOLGARRICK FARM PLAN.

1. Background

Draft Truro and Threemilestone Area Action Plan 2007

The Cornwall Area of Outstanding Natural Beauty Unit considered the inclusion of the Higher Newham and Tolgarrick Farm sites in the 2007 draft AAP for development to be in conflict with the national, regional and local policy guidance for protection of designated landscapes for the following reasons:

- (i) The scheme for housing and community/retail facilities at Higher Newham and Tolgarrick did not demonstrate regard to the requirement to conserve and enhance the natural beauty of the AONB.
- (ii) It did not demonstrate that the proposed development would not cause significant harm to the character of the nationally protected landscape.
- (iii) The findings and recommendations in the evidence base that provided the landscape strategy for Truro were not given sufficient weight in informing the proposals for Higher Newham and Tolgarrick. It was recognised that the approach to the proposed housing had been determined by a number of key factors, with landscape character being one of these. However, the evidence base clearly demonstrated that the proposed development would harm the natural beauty of the AONB. This is a landscape that warrants national protection and has a vital role in the quality of the landscape setting of Truro, its relationship with the surrounding countryside and the rivers that serve it.
- (iv) The strategy in the Truro and Threemilestone Area Action Plan did not clearly outline why the recommendation of the landscape strategy, to examine further options for additional development capacity, has not been taken forward.

A response to the Truro and Threemilestone Area Action Plan 2007 was submitted on the 9th March 2007 objecting to Preferred Option 4 and 5.

2. Draft Truro and Threemilestone Area Action Plan 2008

The Draft Truro Threemilestone Area Action Plan December 2008 is considered to have appropriately addressed the 'key attributes and issues' of Higher Newham and Tolgarrick Farm. Landscape is an important consideration in this assessment and the appropriate weight is considered to be attached to the developments potential to impact on the Cornwall AONB. In particular there is support for:

- Paragraph 10.6 which recognises that Higher Newham and Tolgarrick are critical "in providing landscape setting of the city and have the potential to impact upon the Fal and Helford SAC, Calenick Creek SSSI and Cornwall Area of Outstanding Natural Beauty".
- Paragraph 10.8 which address, in the case of Higher Newham, the "potential impacts from development on the quietness of the SSSI and the Fal and Helford SAC and the importance of the AONB and the landscape setting of the city" and refers to the significant amount of work undertaken to respond to these concerns.

In addition there is support for the landscape and Visual Framework Plan set down in the 'The Truro and Threemilestone Landscape Strategy' (2008) as outlined below:

- (i) This report examines the landscape baseline providing descriptions and outlining implications for the Masterplan. In the context of the AONB it stipulates that the landscape framework should identify ways of promoting and enhancing it. These are supported and in particular the need for "*proper consideration of areas of likely change which are located immediately adjacent to these sensitive landscapes*", with specific reference to Higher Newham in the context of the AONB.
- (ii) With regard to Higher Newham the landscape strategy makes the following analysis under 'landscape character' of character area TL6 (section 2.9) "*Higher Newham Farm (TL6) is an open elevated site, with an exposed wind swept character with extensive views over the city and river. The undeveloped ridge forms an important rural backdrop to Truro and is critical to its setting.*" This outlines the important attributes of this site and refers to the 2000 characterisation.
The landscape character area TL29 of the 2000 characterisation also includes part of the Higher Newham area and under key characteristics it states that "*The area forms a critical part of the very attractive and unspoilt setting of the Creek with its mosaic of farmland, woodland and inter-tidal habitats and the small, attractive village of Calenick. The Creek and land to the south is covered by multiple designations, including SSSI, AGSV, SAC, coastal zone and AONB, and so, by definition, of high quality and sensitive to change. Whilst the area lies beyond the visual setting of Truro, it does reinforce the unspoilt, rural character of the city's*

wider landscape context". The conclusions were that these areas, when assessed against landscape and visual criteria alone, should not be considered for development.

The landscape strategy states that this position is still considered to be valid. The use of this evidence base to support the landscape strategy for Truro is welcomed.

- (iii) An assessment is made of development pressures and direction for growth. The option for growth around the historic city is not supported stating that:

"Historic Truro is a valued and recognised urban area which sits within an equally valued landscape setting that is visually sensitive both in terms of how it is seen from the city and how it is experienced when entering it. Extensive development within the bowl or development that flows over its edge will fundamentally change the relationship between city and landscape and hence its image and identity."

Under the summary of landscape baseline it is stated that *"The landscape character work bolsters the visual setting analysis by identifying open areas and unique character areas in the city's setting. The open areas on the edge of the bowl and the unique character of Higher Newham are the essence of the City's setting which means they present special opportunities for the landscape framework"*.

The recognition of the contribution of the AONB and environs to the setting of Truro is welcomed.

- (iv) The Vision and Spatial Vision for Truro's landscape are supported. The landscape and visual framework plan has appropriate regard to the character of the AONB to the south of the city and will reinforce the requirement to conserve and enhance its natural beauty. One of the elements of the framework is the visual setting of Truro and the bowl, and the need to retain and protect its landscape setting is highlighted. It is stated that *"development extending outside the existing visual setting of historic Truro would enter an entirely new visual envelope and start to have a visual impact on nearby protected landscapes, such as the AONB"*.

3. Current proposal for development at Higher Newham

A planning application for the erection of 1050 dwellings, sheltered accommodation, employment and retail use, community facility, roads, landscape works and ancillary works at Calenick Farm, Lamorran Farm, Higher Newham Farm, Truro is currently being considered by Cornwall Council. The Cornwall AONB Unit's objected to this proposed development, on behalf of the Cornwall AONB Partnership on the grounds that the development does not comply with

national, regional and local planning policy guidance and the Cornwall AONB Management Plan guidance on sustainable development in the protected landscape in that it would significantly detract from the natural beauty of the South Coast Central Section of the Cornwall AONB.

A summary of the reasons for objecting to the proposed development is outlined below:

- the proposals would have long term, major adverse impacts upon the character and special qualities of the AONB landscape resource. This is prejudicial to the statutory purposes of designation (to conserve and enhance natural beauty) and contrary to government guidance and regional and local policies for the protection of AONBs (PPS1 & 7; SWRSS Policy ENV 3; Cornwall County Structure Plan Policy 2; Carrick District Wide Local Plan Policy 3A). These policies give priority to the conservation and enhancement of natural beauty except in circumstances where there is an over-riding public interest and there are no suitable alternatives, or where the need for development outweighs the reasons leading to the designation. There is no evidence that these conditions apply in this case.
- the proposals would also have a long-term, major adverse impact upon individual character areas that form part of the wider landscape resource of the local area and on the setting of the historic city of Truro. This runs contrary to Policy 3A of the Carrick District Wide Local Plan which states that planning permission will be refused for development which would have a significant adverse impact upon biodiversity, beauty, diversity of landscape and the character and setting of settlements.
- the proposals would have an unacceptable impact upon the visual amenity of the local and visiting population, with long term major, substantial or moderate adverse impacts recorded for 37 out of the 53 views assessed in the LVIA. The most significant visual impacts are recorded for areas within the AONB, which further undermines the purposes of designation with regard to recreation and enjoyment of the designated area.
- there is insufficient evidence of the consideration of alternatives in the assessment of environmental effects and the justification of this site as the best option for development of this scale and nature. We believe that there are better alternative sites available where this level of unacceptable impact on landscape resources could be avoided.

A full statement outlining the reasons for objecting is attached.

4. Conclusion

The Cornwall AONB Unit, on behalf of the Cornwall AONB Partnership supports that Higher Newham and Tolgarrick Farm will not be included in the proposals for growth in the Truro and Threemilestone Area Action Plan due to landscape impact on a nationally designated site.

Planning Application No. EA03/0035/09/M - Calenick Farm, Lamorran Farm, Higher Newham Farm, Truro - Response from Cornwall AONB Unit

1 Introduction

- 1.1 This statement contains the response of the Cornwall AONB Unit to the above application and supporting Environmental Statement. Specifically, it sets out the Unit's significant concerns about the potential adverse impact of the proposed development upon the South Coast Central Section of the Cornwall Area of Outstanding Natural Beauty.
- 1.2 Our response has been considered within the context of:
- the statutory background to the Cornwall AONB, including the purposes of, and reasons for, designation;
 - current national policy guidance and regional and local planning policies relating to the protection of designated landscapes and the wider countryside;
 - best practice guidance on assessment of landscape character, and the landscape and visual impacts of development;
 - studies relating to the character, quality and potential sensitivities of the landscape within the AONB and within and surrounding the application site and the Truro urban area;
 - other relevant planning studies concerning development options within and around Truro;
 - the observations, experience and professional expertise of the AONB Unit and our appointed consultants, LDA Design.
- 1.3 This document is an initial response to the proposals and is primarily intended to establish the grounds for our objection in principle to development on this site and the main reasons why we believe it should be refused, rather than to provide a point-by-point response to the details of the application. Further detailed justification and critical analysis of the scheme can be provided if required.

2 Landscape issues

- 2.1 The proposed development site comprises open farmland occupying the top and flanks of a prominent ridge separating the southern built edge of Truro from Calenick Creek, a tributary of the Truro River. The centre of the creek forms the boundary of the Cornwall AONB (Southern Coastal Section), which extends southwards and eastwards across the Truro River. Apart from its national landscape significance, the environmental importance of the River and adjacent land is evidenced by a variety of other statutory and local environmental designations (e.g. SAC, SSSI, Coastal Zone etc.).
- 2.2 Although the application site itself lies outside the AONB (and other designated areas), it lies within close proximity to the boundary and has a clear physical and visual relationship with the designated landscape. Development in this location raises a number of important landscape issues, including:
- the potential impact of the proposed development on the character and special features of the AONB landscape resource;
 - the potential impact on the landscape of the site itself as part of the wider countryside resource;
 - the potential impact on the setting of Truro;

- the potential impact on the visual amenity of the local and visiting population.
- 2.3 These considerations draw an important distinction between potential landscape impacts (i.e. the loss of or damage to the landscape resource itself, which can be important regardless of how visible it is) and visual impacts, which are concerned with the effects of changes in the landscape upon the visual amenity and enjoyment of people. It is important not to confuse these related, but separate impacts, as emphasised within best practice guidance (Guidelines for Landscape and Visual Impact Assessment (2002) Landscape Institute/Institute of Environmental management and Assessment, p.12).
- 2.4 Our response is concerned primarily with the potential impacts on the AONB landscape as a resource of national importance, although we consider the other issues to be important material planning considerations from a landscape perspective and set out our main concerns in these respects also.

3 Policy context

- 3.1 'Area of Outstanding Natural Beauty' is a statutory designation that confirms that the landscape, within the delineated area, is of a quality that warrants national recognition and protection. As such, AONBs are afforded the highest status of protection from damaging development at all levels of the planning system.
- 3.2 At the national level, the Countryside and Rights of Way Act 2000 places a duty upon the relevant authorities to have regard to the statutory purposes of AONBs in reaching decisions or carrying out their activities. National planning guidance (PPS1 and PPS7) reinforces the national status of AONBs and emphasises the need for the highest level of protection. It recommends that the "*conservation of the natural beauty of the landscape and countryside should... be given great weight in planning policies and development control decisions*", and major developments not permitted within designated areas unless there is an over-riding public interest and there are no suitable alternatives.
- 3.3 This guidance is translated into regional policy. The South West Draft Regional Spatial Strategy (2006) reinforces the national status of AONBs and Policy ENV 3 states that "*the conservation and enhancement of natural beauty, wildlife and cultural heritage will be given priority over other considerations in the determination of development proposals. Development will only be provided for where it would: conserve and enhance the natural beauty, wildlife and cultural heritage of the ...AONB...*". Importantly, the policy also states that "*Particular care will be taken to ensure that no development is permitted outside the ...AONB which would damage [its] natural beauty, character and special qualities or otherwise prejudice the achievement of ...Area of Outstanding Natural Beauty purposes*". This clearly establishes a principle of restraint on development outside the boundary of the designated area which could, even indirectly, have a potentially adverse effect upon the AONB.
- 3.4 Planning policies at the local level are in a state of transition from the former development plan system to the new Local Development Framework. However, those policies that remain in force within the Cornwall County Structure Plan (2004) and the Carrick District Wide Local Plan (1998) also

support the principle of the strongest level of protection for AONBs. Policy 2 of the Structure Plan states that, "*The conservation and enhancement of sites, areas, or interests, of recognised ...national importance for their ...landscape importance..should be given priority in the consideration of development proposals.*" The supporting text acknowledges that AONBs require the strongest protection from any adverse effects arising from development, going on to say that "*full account needs to be taken of the specific features or qualities which justified designation of the area, and sustain or further the purposes of that designation.*" It confirms that "*the impact of development on these areas will require careful consideration. To be acceptable, the need for development will have to outweigh the reasons leading to the designation.*"

- 3.5 Within the Environment section of the Carrick District Wide Local Plan, the objective is stated "*To protect the countryside from unnecessary development and to protect the Area of Outstanding Natural Beauty, AGLV and the coast from conflicting development proposals*". This is translated into Policy 3A which establishes a broad policy for landscape protection, stating that "*planning permission [will be refused] for development which would have a significant adverse impact upon its biodiversity, its beauty, diversity of landscape, the character and setting of settlements, the wealth of its natural resources, its nature conservation and agricultural, historic and recreational value.*" This policy has been saved, in accordance with the direction of the Secretary of State. The specific AONB policy (3AD) has not been saved but, in the light of Policy 3A and national, regional and strategic guidance, we assume that the Council's approach to planning decisions in respect of the AONB is likely to remain as set out in the explanatory text (paras. 3.5.2-3.5.5). Importantly, this also recognises the need to take into account the potential impacts on the AONB in determining development proposals located outside the designation boundary (para. 3.5.5).
- 3.6 Further policy context is provided in the Cornwall AONB Management Plan which provides a strategic overview of the management needs of the Cornwall AONB as a whole. The plans vision is that the Cornwall AONB should be:
"An internationally important landscape valued for embodying the special quality of Cornwall underpinning the local economy and everyone's quality of life. It is nurtured by effective partnership, sufficient resources and only sustainable development."
- 3.7 This is to be achieved by ensuring the AONB remains a working, vibrant, bio diverse, cultural and valued landscape. As a valued landscape, the Cornwall AONB is one of the country's finest landscapes and the quality of the environment is regarded as an asset to the community and economy.
- 3.8 Under the heading "Vibrant Landscapes" housing is addressed and in the context of rural "Exceptions" sites Policy VibL 1 is set down to "Ensure that housing developments by their location and design do not unnecessarily compromise the local character of the AONB and are effectively tied to be of long term value to the communities in which they are located".
- 3.9 Policy WL6 sets down the requirement to "*Encourage a consistent AONB wide approach to the development and implementation of planning policies that ensure appropriate sustainable development in the AONB*".

Paragraph 5.3.16 refers to the AONB being regarded as a “positive benefit to rural development”, “encouraging small scale development that contributes to protecting and improving the landscape qualities that make the area special”.

4 Policy criteria

- 4.1 In the light of the above, there can be no question that AONBs should receive the strongest possible protection from damaging development. The conservation and enhancement of natural beauty must be given priority in consideration of development proposals of all scales and types. As emphasised in ‘The Cornish Landscape’ (an assessment of the AONB produced by the Countryside Commission in 1997, p.59), “a particularly sensitive relationship ... exists between the AONB and the surrounding countryside, and planning policies and countryside management schemes need to reflect this.” The principle of restraint is therefore applied not only for developments located within the AONB but also to those outside it which could have adverse effects upon the designated area.
- 4.2 The critical issue is whether the development proposals are acceptable or unacceptable in terms of this strong policy of restraint. Specifically:
- what features define the character and special qualities of the AONB landscape, and justify its designation?
 - would the proposed development adversely affect these features and/or prejudice the achievement of the purposes of AONB designation?
 - can development on this site be justified in relation to possible alternatives where potential impacts on the AONB may be reduced or avoided altogether?

5 Landscape character and special qualities

Landscape of the Cornwall AONB

- 5.1 The Cornwall AONB was designated in 1959 in recognition of its outstanding landscape qualities. To qualify for designation, AONBs must (by definition) be of outstanding natural beauty, a term that embraces scenic quality, nature conservation, history and culture. The landscape must be judged to be of national importance, unspoilt by large scale intrusive development and possess distinct character and sense of place. This is a fragmented and diverse AONB, made up of 12 separate but distinctive areas covering 958 sq km. It contains some of Britain’s finest coastal and moorland scenery: from Lands End and the Lizard peninsula, the historic moorland of Penwith, the extensive rolling dunes and spectacularly folded cliffs and rocky headlands of the north coast, the high open sweep of Bodmin Moor, to the softer landscape of multi-coloured cliffs, tiny coves and fishing villages along the south coast, indented by the oak fringed estuaries of the Fal, Fowey and Helford Rivers. The traditional farmed landscape of small hedged and banked fields is intrinsically part of the AONB’s value, as are its ancient standing stones and the distinctive ruins of Cornwall’s tin mines.

Landscape of the South Coast – Central section

- 5.2 The part of the AONB which borders the application site is known as the ‘South Coast – Central’ section and extends from the western side of the Fal Estuary at Mylor, eastwards along the Roseland Peninsula and the coastal landscape to Porthpean near St Austell. The Truro River, and Calenick Creek, form part of a large estuarine complex of ‘rias’, or drowned river valleys, branching inland from the Fal Estuary. This is recognised as one of

best unspoilt examples of this increasingly rare landscape feature in Europe, many of which have been damaged by reclamation or grazing. This is a highly distinctive landscape of tidal creeks and inlets, fringed by salt marsh and alder carr and some of largest remaining tracts of ancient woodland in the county. As well as their scenic qualities, these habitats are of outstanding nature conservation value. The rounded ridges between the wooded creeks have not been developed for settlement and are characterised by scattered farms and some large estates with historic parkland, such as Trelissick and Tregothnan. Small villages have developed at the head of many of the creeks, as has the city of Truro, but settlement is generally sparse within the area and the over-riding character is one of a remote, enclosed and tranquil landscape, largely unspoilt or affected by urbanisation or modern development.

The local landscape

- 5.3 The local landscape surrounding the Truro River between Malpas and Truro (including the application site) displays many of the distinctive characteristics and quintessential qualities of the South Coast Central section of the AONB. This is supported by the various landscape character assessments which have been undertaken within this area at different scales. Some of the assessments (e.g. the New Map of England 2005) are too broad-brush to be helpful in defining the key characteristics at this local scale. Others are more detailed, such as the Cornwall Landscape Assessment (1994), the Landscape Strategy for Truro, Falmouth and Penryn (2000) and, most recently, the Cornwall and Isles of Scilly Landscape Character Study (2005-2007).
- 5.4 The character area descriptions within these assessments show a high degree of consensus over the features and qualities that define landscape character in this general locality, in particular:
- the distinctive topography of low rounded hills and plateaux dissected by an intricate system of twisting river valleys draining into the estuarine system of the Fal;
 - the typical semi-natural habitats of the inter-tidal creeks, including brackish open water, mudflats and saltmarsh, grading into freshwater marshes and pasture, with occasional heathy vegetation along the shoreline;
 - the sloping valley sides of the river and creeks with distinctive land cover - some parts thickly wooded, other parts under pasture with intact structure of hedgerows and trees, or parkland with characteristic ornamental planting (e.g. Monterey Pine);
 - the typical pattern of settlement, generally sparse with attractive small villages (and Truro itself) located at the head of creeks and in valleys, with scattered farms on the rounded ridges between the creeks, accessed by a network of rural lanes;
 - water-related, industrial character of quays and landing stages along riverside, e.g. immediately to south of Truro;
 - high scenic quality and a predominantly rural, unspoilt character, with few urban or detracting influences (the built areas of Truro are not conspicuous in many views of this landscape, hidden behind enclosing landform);
 - a sense of remoteness, shelter, peace and tranquillity, despite proximity to Truro;
 - elemental and aesthetic qualities associated with the fluctuating tides and quality of the light over water.

- 5.5 These features and special qualities are typical of much of this general locality and are not just confined to the part designated as an AONB. In fact, the landscape assessments do not specifically recognise any difference in character between the landscape of the AONB and the surrounding areas.
- 5.6 For example, the CIS Landscape Character Study attributes virtually all of the landscape to the south of Truro to the same broad Landscape Character Area (CA13), excluding only the tops of the main ridges. This assessment also shows a consistent character for all of the land to the west of the Truro River (apart from the ridge top at port Kea) at the smaller Landscape Description Unit scale (LDU405). Thus, the assessment regards the application site to have essentially the same character as the AONB.
- 5.7 The Landscape Strategy for Truro also draws no specific distinction between the character of the landscape within and outside the AONB in this locality. In particular, Character Area TL29 straddles the AONB boundary which runs along the middle of Calenick Creek, embracing the full extent of the sloping ground which visually and physically contains the creek on either side. The south-facing slopes of the application site therefore form an integral part of a coherent valley landscape unit and have a direct visual relationship with the opposite side of the creek, which lies within the AONB. In this particular location, it would seem that the AONB boundary was drawn to follow a clearly defined and defensible, mapped feature, rather than to reflect any discernible change in landscape character and quality on the ground.
- 5.8 While it may not benefit from formal designation, the application site shares many of the key attributes of the AONB and its south-facing slopes have a direct physical and visual relationship with land within the designated area. The site is not an isolated and distinct area - it forms one of the typical rounded, open hills separating the river valleys and is an integral component of the wider ria landscape resource of the Truro River and Fal Estuary complex.
- 5.9 As a landscape resource in its own right, the site retains an unspoilt character and has many positive features, including a strong network of hedgerows, trees and woodland, traditional farm buildings, a comparatively remote character (despite its proximity to the city) and impressive wide-ranging views out across the city to the north and across the high quality river valley landscapes to the south, east and west.

6 Potential impacts on landscape character and special qualities

Potential impacts on the site

- 6.1 The proposed development constitutes a significant urban extension, comprising up to 1050 dwellings, 3000 sq.m of employment uses; a new primary school, a Local Centre comprising a food retail store, local shops and services, local office and employment accommodation, a Community Hall, a pub/restaurant, a country park and public open space facilities (including allotments and orchards). It will involve significant new road and services infrastructure, lighting and ground remodelling to accommodate access and suitable development platforms on this sloping site.
- 6.2 This is, therefore, not a small-scale development. It involves the transformation of 62ha of open farmland, with a rural, unspoilt character, into

a dense, mixed-use urban development, with all the facilities, services and activities required to support a development of this scale. The character of the landscape within the site will change completely and irrevocably: its physical form will change through remodeling to accommodate access, buildings and sports pitches; and the development will introduce large numbers of people, cars, and increased activity, lighting and noise levels into an area of open countryside, significantly affecting the sense of remoteness and tranquility. Characteristic landscape features, such as historic hedgebanks and farm buildings, will be lost or subsumed within the new development and its open character will be lost to a pattern of built form and landscape structure that is completely out of character with the rural, ria landscape of the surrounding area, of which it forms an integral part.

- 6.3 These changes will inevitably, have a dramatic and irrevocable impact upon the landscape character of the site and, quite apart from any potential impact on the neighbouring AONB, will amount to loss of an important local landscape resource in its own right. We concur with the judgment of long-term major adverse impact (i.e. the most severe degree of impact) given to the site area within the LVIA accompanying the application (see Appendix 4, p. 9, TL6 and TL29).

Potential impacts on the AONB

- 6.4 As described above, although the site itself lies outside the AONB boundary, it is not an isolated or distinct area – it is an integral part of a wider landscape of outstanding value. In our view, development on the scale envisaged will have a lasting, major adverse impact upon the character and special qualities of the AONB, as well as non-designated landscapes in the surrounding area.
- 6.5 The LVIA acknowledges that the proposed development would potentially have an adverse impact on the AONB landscape, judging this to be a long term, ‘moderate adverse’ impact, on the basis that:
“The AONB does not lie immediately alongside the site and the area of AONB affected by views is small and views of proposals are relatively limited, therefore the impact of the proposals on the character of the AONB would be limited to moderate. Many parts of the AONB in this area have views of Truro city, including the industrial area at Newham and the main change in character will be that the perceived extent of the city lies a little closer to the AONB than at present.”
- 6.6 We would take issue with a number of these points. Firstly, the site boundary and the AONB boundary are virtually contiguous: the former runs along the northern edge of the creek, the latter along the centre of the channel. So the development lies within very close proximity to the designated landscape. Secondly, we would argue that the LVIA underestimates the extent of the AONB affected (see below) but that, in any case, adverse impacts on the AONB cannot be justified or downgraded purely on the basis that they affect only a small area. This approach would set a dangerous precedent for development around and within designated areas, inevitably leading to the progressive attrition of the AONB resource as small areas are ‘nibbled away’ or degraded because development impacts “affect only a small area”. We would argue that the scale of impact on the AONB in this area is ‘major adverse’, for the reasons set out below. Thirdly, the extent of views of the site from within the AONB is not the key issue in determining landscape impacts, it is the impact on the resource itself which is critical, irrespective of how widely this is viewed. Fourthly, we do not agree that the “main change in

character will be that the perceived extent of the city lies a little closer to the AONB than at present". There are more fundamental impacts on landscape character and quality than this suggests, as we set out below.

- 6.7 We have described above how the development would affect the landscape character and quality of the site itself. We have also argued that the site forms an integral part, and shares the essential characteristics of the wider ria landscape, including the AONB. We believe that the dramatic changes to the site would therefore have a 'knock-on' effect upon the character and special qualities of the AONB in this area, the key impacts being:
- the intrusion of significant built development into an otherwise rural, agricultural landscape, eroding scenic quality and affecting perceptions of the unspoilt character of the landscape within this local area.
 - the disruption of the characteristic pattern of small settlements located at the head of creeks and in the valleys, and scattered farms located on the rounded ridges and sloping ground between the creeks and valleys. Dense urban development clothing the top and sides of the ridge would be completely out of character with the quintessential ria landscape;
 - the intrusion of urbanising influences, particularly lighting along streets, sports pitches and from houses and cars, which will significantly alter the character of the landscape at night within currently dark areas to the south and west;
 - the intrusion of noise and increased human and vehicle activity affecting the quiet, tranquil and remote qualities of the ria landscape.
- 6.8 Land within the AONB to the south of Calenick Creek will be most significantly affected by these impacts, particularly by development on the south-facing slopes below the ridge-line within the site (areas 2, 2a and 4 shown on Fig 1.05 of the LVIA). As explained, these slopes 'belong' to the landscape to the south, forming an integral part of the valley containing Calenick Creek, and are a typical component of the wider ria landscape of low hills dissected by sinuous valleys and creeks. This valley landscape unit comprises an extremely attractive (as well as ecologically valuable) mosaic of farmland, woodland, marshland, riparian and inter-tidal habitats and the small attractive, historic village of Calenick. The multiple designations applied in this area confirm its special qualities and sensitivity to change. Conserving these qualities relies upon maintaining the quality of the landscape unit as a whole, given the strong physical and visual relationship that exists between the valley floor and the sloping sides which contain it.
- 6.9 However, the proposed development on the southern slopes of the site would radically and permanently alter the character of this area, thereby affecting all parts of the valley landscape including those within the AONB. The unspoilt open farmland, with its peaceful rural character, traditional field boundaries and buildings will be lost to intense urban development, including roads, lighting and infrastructure, which is completely out of character with the valley landscape and harmful to its special qualities, even once the proposed planting has matured. The LVIA acknowledges this potential impact, concluding that there will be a long term major adverse impact on Character Area TL29 of the Truro Landscape Strategy. This area covers both sides of Calenick Creek, including land within the site and the AONB. In respect of impacts on the AONB, the LVIA also acknowledges that:
- "This extension to the urban area would include elements such as lighting, noise and movement which are not currently part of the tranquil landscape*

character in the AONB to the south of the HN site, especially in the introverted creekside landscape.”

- 6.10 While the impact on Calenick Creek and its immediate setting is likely to be the most severe, the proposed development will have wider-reaching impacts across other parts of the AONB to the east and south. The unspoilt, rural character of the ria landscape and general absence of significant built development, especially on the open rounded hills and ridges, is one of the key features of the AONB. From the AONB to the south and south-west, development in Truro and along the riverside is largely obscured by landform or vegetation (e.g. see Photomontage viewpoints A3, R and S in the LVIA). From other (non-designated) areas to the east, built development is a more visible component of the landscape (e.g. see Photomontage viewpoints F, K and L) but it still conforms to the general pattern of development contained within valleys or along the riverside. This pattern is reinforced by the open, undeveloped character of the site, which acts as a strong landscape buffer containing Truro within its natural basin and riverside development to the lower slopes.
- 6.11 The LVIA photomontages (particularly from viewpoints A3 and F) illustrate how this pattern would be significantly altered by allowing development to sprawl over the ridgetop, intruding into Truro's unspoilt hinterland and affecting the character and special qualities of the AONB itself and surrounding non-designated parts of the ria landscape. This wider impact is acknowledged within the LVIA, with moderate or substantial adverse impacts being recorded for all of the landscape character areas overlooking the Truro River in this area, both within and outside of the AONB to the south and east.
- 6.12 There are no beneficial impacts on landscape character recorded within the LVIA, either within or outside the AONB. The development is therefore prejudicial to the achievement of the primary purpose of AONB designation – it would neither conserve nor enhance natural beauty. Indeed, it would do the opposite.

7 Potential impacts on the setting of Truro

- 7.1 As well as its contribution to the wider ria landscape and setting of the AONB, we support the findings of the Landscape Strategy for Truro, Falmouth and Penryn (2000) which conclude that the site area lies beyond the 'natural edge' of Truro and has an important role in its setting. While Truro does not lie within the AONB itself, it has an important relationship with it. It forms part of the wider landscape and settlement context for the designated area, reinforcing the characteristic pattern of settlements evolving within river valleys. Its containment within its natural and physical setting has an influence on views from within the AONB and perceptions of its character and quality. Changes in the relationship between Truro and its landscape setting therefore have the potential to affect perceptions of the character and quality of the AONB.
- 7.2 The LVIA (supporting the application) plays down this role, asserting that, *“from the city core and the principal movement route along the Highertown Ridge, the High Newham site plays little or no role in the perception of the city lying in a bowl”* (para. 3.7, ref. Fig 1.09). We find these conclusions confusing, since the assessment goes on to illustrate that parts of the site are visible, to a greater or lesser degree, from certain viewpoints in all directions surrounding the site. We would argue that perception of the bowl does not

rely entirely on individual views: it can be gained from numerous glimpses and experiences while moving around the city and 'over the edge' of the bowl into different landscapes, shaping the perception that the city sits within a well-defined rural setting.

- 7.3 However, the extent of visibility of the site or perception of the 'bowl' is not the only issue here. The fact remains that, historically, Truro developed at the confluence of three rivers within a natural basin surrounded by hills and ridges and has grown steadily outwards and upwards towards the edge of the basin, towards the limits of its 'natural setting'. The site lies on the prominent ridge of high ground that forms the southern edge of the basin. This ridge physically and visually contains the city within its natural setting, maintaining the rural, tranquil and unspoilt character of the outstanding ria landscape to the south and reinforcing the distinctive character of Truro, and appreciation of its historic origins and its rural landscape setting.
- 7.4 Development on the top and southern flanks of the ridge would breach this natural containment and allow Truro to 'overflow' the rim of the basin into this landscape beyond its natural and historic setting. Not only would such a breach be damaging to the character and quality of the landscape to the south, it would affect the distinctive character of the historic city and its 'green' setting and may set a precedent for further urbanisation of areas beyond the historic setting of the town, such as the very attractive, unspoilt valley landscape between Calenick and Treyew Mills immediately to the west of the site.
- 7.5 Adverse impacts on the setting of settlements are covered under Policy 3D of the Carrick District Wide Local Plan (a saved policy) which states that "*Planning permission will not be granted for development where it has a significant adverse impact upon areas that provide... (i) a green foreground or background important to the character of the settlement*". We believe that development on the site, of the scale proposed, would have a significant adverse impact on the setting of Truro.

8 Potential impacts on visual amenity

- 8.1 The impacts described in our response so far have all concerned potential effects upon the landscape, for its own sake as part of our natural resource base or for its contribution to the setting of Truro's built heritage. Impacts on visual amenity deal with the effects that changes in the landscape will have on available views, how people may respond to these views and the overall effects on the visual amenity of those people. As mentioned earlier, it is most important that these two, linked but separate aspects, are not confused, i.e. changes in the landscape viewed by only a few, 'less sensitive' people may not have a major impact in visual impact terms but could be highly damaging in terms of the impact on the landscape resource.
- 8.2 That said, there is no doubt that the development will cause visual impacts which will affect the perceptions and enjoyment of people when viewing the landscape from their homes, places of work, while travelling, or while visiting the area for holidays and recreation. The LVIA statement presents a detailed analysis of the extent of views, how these would change and how significant these changes will be on the visual amenity of viewers. The viewpoints appear to cover a wide surrounding area, but we reserve judgement on the findings of the submission which need to be checked in some detail. For the

purposes of this response we would like to make the following general comments.

- 8.3 Our first point is that, overall, the development will cause unacceptable levels of visual impact, in addition to the landscape impacts described above. Of the 53 views analysed in the LVIA, 46 are considered by the applicants themselves to have an adverse visual impact (9 minor, 16 moderate, 14 substantial and 7 major adverse impacts). 6 views are considered to have a neutral impact and only 1 view a beneficial impact (moderate). Even if all of the judgements made in the LVIA are reliable, and we might question several, this paints a fairly worrying picture of the extent to which visual amenity will be affected by the proposals. The areas affected by the most significant impacts (moderate to major) are located to the south and east of the site, comprising viewpoints from within the AONB (ZVI areas 6 and 7 in the LVIA) and the neighbouring areas (8, 9, 3 and 2). As a general statement, we would agree that views from these areas are generally the most sensitive (more of the site can be seen, the views are currently of a high quality and unspoilt, and the viewers likely to be particularly sensitive to change as visitors to the AONB or local residents), and they are most likely to be affected by higher levels of adverse impact.
- 8.4 Photomontages from viewpoints A3, R and S, in particular, illustrate the severity of these impacts, showing how the proposed built development would introduce an urbanising and alien character into these existing views of unspoilt, open farmland and semi-natural habitats associated with the ria landscape. Even with substantial new planting to try and integrate the development, the resulting changed view is completely out of character with the high quality setting of the AONB and public views of the wider countryside.
- 8.5 Our second point is that these impacts can be cumulative, in that people move from one place to another and will be affected by changes in views in several locations, e.g. people using the network of footpaths and cycleways, travelling up the river by boat, driving between home and work, shops etc. So suggestions that changes to individual views will affect only limited numbers of viewers, and that only a small part of the AONB is affected, are misleading.
- 8.6 In our opinion, the overall level of adverse visual impact is unacceptable and we are particularly concerned about the impacts on visual amenity of viewers from within the AONB to the south, whose enjoyment of the unspoilt, tranquil ria landscape could be seriously affected by intrusive built development.

9 Potential alternatives

- 9.1 One of the key requirements of any environmental impact assessment process is that alternatives are considered and assessed to arrive at a reasoned justification as to why the site and proposals are the most appropriate. From a purely landscape point of view, we are not convinced that this site is the most suitable for development of this scale and nature and believe that there are better alternative sites available.
- 9.2 The site itself is part of the county's finite rural landscape resource and essentially forms an integral part of the highly valued and rare ria landscape to the south. Development on the site will result in significant impacts on the site itself, on the wider landscape resource and on a nationally designated AONB landscape. The proposals extend the development into a visual

context that is essentially devoid of urban influences and the visual envelope of the city into the rural context will be substantially extended, eroding its historic setting.

- 9.3 By contrast, the area to the west along Highertown-Threemilestone Ridge does not have these sensitivities and has been identified as having the capacity to accommodate development. It is not in close proximity to the AONB and does not share its landscape characteristics, and it has been identified as the preferred areas for growth by the Council. Development in this location would be almost exclusively within a visual setting that is already strongly affected by urban influences.
- 9.4 In a county with such precious, finite landscape resources, we have to question why choose to dramatically enlarge the extent of urban influences into an area of exceptionally sensitive landscape when there are good alternative locations where such significant impacts could be avoided.

10 Conclusions

- 10.1 In conclusion, we believe there are a variety of reasons, and strong justification, for refusal of planning consent for this application on landscape grounds. In summary, these are as follows:
- for the reasons outlined above, we consider that the proposals would have long term, major adverse impacts upon the character and special qualities of the AONB landscape resource. This is prejudicial to the statutory purposes of designation (to conserve and enhance natural beauty) and contrary to government guidance and regional and local policies for the protection of AONBs (PPS1 & 7; SWRSS Policy ENV 3; Cornwall County Structure Plan Policy 2; Carrick District Wide Local Plan Policy 3A). These policies give priority to the conservation and enhancement of natural beauty except in circumstances where there is an over-riding public interest and there are no suitable alternatives, or where the need for development outweighs the reasons leading to the designation. There is no evidence that these conditions apply in this case.
 - the proposals would also have a long-term, major adverse impact upon individual character areas that form part of the wider landscape resource of the local area and on the setting of the historic city of Truro. This runs contrary to Policy 3A of the Carrick District Wide Local Plan which states that planning permission will be refused for development which would have a significant adverse impact upon biodiversity, beauty, diversity of landscape and the character and setting of settlements.
 - the proposals would have an unacceptable impact upon the visual amenity of the local and visiting population, with long term major, substantial or moderate adverse impacts recorded for 37 out of the 53 views assessed in the LVIA. The most significant visual impacts are recorded for areas within the AONB, which further undermines the purposes of designation with regard to recreation and enjoyment of the designated area.
 - there is insufficient evidence of the consideration of alternatives in the assessment of environmental effects and the justification of this site as the best option for development of this scale and nature. We believe that there are better alternative sites available where this level of unacceptable impact on landscape resources could be avoided.

- 10.2 These are our primary objections to the principle of development of this scale and nature on this site, as opposed to the detailed design of the development proposals. In our view, this is a highly sensitive site that cannot be developed without causing unacceptable landscape and visual impacts, even with mitigation in place. For this reason, we have not commented on the scheme design in any detail at this stage.
- 10.3 In conclusion, for the reasons set out above, we strongly recommend that planning consent be refused for this application.

Graham Webb
Development Services
Carrick District Council
Carrick House
Pydar Street
Truro
Cornwall
TR1 1EB

17th March 2009

Your Ref: EA03/0035/09/M

Dear Graham Webb

**Planning Application No EA03/0035/09/M - Erection of 1050 dwellings, sheltered accommodation, employment and retail use, community facility, roads, landscape works and ancillary works.
Calenick Farm, Lamorran Farm, Higher Newham Farm, Truro.**

Thank you for consulting the Cornwall Area of Outstanding Natural Beauty (AONB) on the above application. I attach the response of the Cornwall AONB Unit, representing the Cornwall AONB Partnership. These observations outline the grounds for **objection** in principle to the proposed development at Higher Newham Farm, Truro.

The proposal is objected to on the grounds that the development does not comply with national, regional and local planning policy guidance and the Cornwall AONB Management Plan guidance on sustainable development in the protected landscape in that it would significantly detract from the natural beauty of the South Coast Central Section of the Cornwall AONB.

A summary of the reasons for objecting to the proposed development is outlined below:

- the proposals would have long term, major adverse impacts upon the character and special qualities of the AONB landscape resource. This is prejudicial to the statutory purposes of designation (to conserve and enhance natural beauty) and contrary to government guidance and regional and local policies for the protection of AONBs (PPS1 &7; SWRSS Policy ENV 3; Cornwall County Structure Plan Policy 2; Carrick District Wide Local Plan Policy 3A) . These policies give priority to the conservation and enhancement of natural beauty except in circumstances where there is an over-riding public interest and there are no suitable alternatives, or where the need for development outweighs the reasons leading to the designation. There is no evidence that these conditions apply in this case.
- the proposals would also have a long-term, major adverse impact upon individual character areas that form part of the wider landscape resource of the local area and on the setting of the historic city of Truro. This runs contrary to

Policy 3A of the Carrick District Wide Local Plan which states that planning permission will be refused for development which would have a significant adverse impact upon biodiversity, beauty, diversity of landscape and the character and setting of settlements.

- the proposals would have an unacceptable impact upon the visual amenity of the local and visiting population, with long term major, substantial or moderate adverse impacts recorded for 37 out of the 53 views assessed in the LVIA. The most significant visual impacts are recorded for areas within the AONB, which further undermines the purposes of designation with regard to recreation and enjoyment of the designated area.
- there is insufficient evidence of the consideration of alternatives in the assessment of environmental effects and the justification of this site as the best option for development of this scale and nature. We believe that there are better alternative sites available where this level of unacceptable impact on landscape resources could be avoided.

These are our primary objections to the principle of development of this scale and nature on this site, as opposed to the detailed design of the development proposals. In our view, this is a highly sensitive site that cannot be developed without causing unacceptable landscape and visual impacts, even with mitigation in place. For this reason, we have not commented on the scheme design in any detail at this stage. However, further detailed justification and critical analysis of the scheme can be provided.

In conclusion, for the reasons set out above and supported in the attached statement, we strongly recommend that planning consent be refused for this application.

Yours sincerely

June Crossland
Planning Officer
Cornwall AONB Unit