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Dear Chris,

Pease Bay Holiday Park Extension
Comments on Landscape Officer response to Landscape Report

Thank you for forwarding to us the response to our Landscape and Visual Appraisal by the Landscape Officer of Scottish Borders Council. We have a number of comments to make on this document. For ease of reading, we have pasted the Landscape Officer's response *in italics* below, and inserted our comments after each section.

1. Key Issues

A single "key issue" is raised:

Potential visual intrusion and obstruction of views of the Special Landscape Area from the sensitive receptors including settlements, the public road and long distance footpaths.

We note that the single "key issue" raised is the potential visibility of the scheme from sensitive visual receptors. Landscape comments made later in the document are therefore noted, but effects on landscape character are not regarded by the council Landscape Officer as "key issues".

We consider that the stated effects on visual amenity described as "key issues" would not be key issues for a number of reasons:

First, the proposed scheme would not cause any obstruction of views of the SLA, other than of the developed area itself, because the new lodges would be below the line of any wider views of any part of the SLA from any possible public viewpoints. We provide further comments on this issue below.

Second, regarding settlements. The proposed scheme would be visible from three dwellings:

- A small part of the extreme southern part of the curtilage of Old Linhead, namely rough ground between the entrance gate and a derelict barn, but not from any part of the house;
- windows at a single hilltop bungalow at Old Cambus West Mains, over 1 km from the site (discussed further below);
- and (possibly) a single upstairs gable end window in the nearby farmstead also at Old Cambus West Mains, over 1.2 km from the site.

We cannot agree that visual intrusion or obstruction of views could be a Key Issue from any of these places, individually or collectively, either because of the distance or (in the case of Old Linhead) due to the absence of any view from any part of the house or garden. We also consider that insufficient account has been taken of the proposed screen planting, in particular the proposed trees at the western end of the site between the holiday park and Old Linhead.

Viewpoints

This Planning Application is accompanied by a Landscape and Visual Appraisal that includes an assessment and summary of the effects on landscape and visual amenity and proposals for mitigation. A number of viewpoints identified on Fig 7.1, though poorly keyed into the text...

We apologise for this confusion. The viewpoints are described in a numbered list on pages 39 and 40, shown on a map on page 41 using the same numbering as the list which immediately precedes it, and described in the same order and with the same names in the paragraphs starting immediately below the map on page 41, and continuing to page 45. We accept that we could have numbered the paragraphs in pages 41 to 45 as well.

Effects on landscape character

As noted above, the Landscape Officer does not consider effects on landscape character to be a “Key Issue”. Nevertheless, we have some comments on the issues she raises.

At 6.5.2 the applicant notes that to accommodate the lodges on the steep slopes 2no. terraces 40m wide x 218m long and retaining walls would be created. In addition earth works in association with the steep access from the D149 will be required. The report summarises that the ‘scale of change’ of the landform is likely to be small but no supporting information is provided regarding anticipated ground levels, heights of retaining walls, gradients and heights of banking at the terrace ends.

I understand that you have arranged for additional drawings to be prepared.

In relation to landform, our judgement is based on the way the shape of the landform is perceived, and how the changes to landform caused by the proposed scheme would alter the character of the landscape. The landscape of Pease Bay is characterised by the way the undulating inland landscape transitions abruptly to the steep slopes which run down to the beach and foreshore, and the consequent enclosure of the bay compared with the surrounding countryside. The proposed scheme would insert steps, or terraces, into the steep slopes, but the overall gradient and shape of the landscape would remain unchanged.

I have concerns that the extensive lengths of the 2 terraces and retaining walls possibly 3-4m (?) high or more are likely to have a greater impact on the character of the landscape than assessed. Furthermore the lodges and their associated hardstanding, access road and dark mass of roofs may serve to emphasise the hard engineering of the retaining structures and terraces particularly in close proximity to the site albeit that mitigation planting is proposed.

The steeply-sloped “risers” of the terraces, the slopes between the terraces, and some of their horizontal surfaces, would be clad in semi-natural vegetation which would soften the appearance of the hard engineering, and there would be few hard edges or corners. Previous applications proposed the use of stone-filled steel mesh gabions which would remain prominent and hard-edged; the current application, utilising the Flex-MSE system which would be entirely covered in vegetation, is very different. We wonder whether the Landscape Officer was provided with the details of this retaining wall system, including the Flex-MSE brochure and supporting images, which were submitted with the application.

In landscape character terms there is a distinct transition between the contained Pease Bay valley and the open expansive tops. The movement from open landscape to enclosure provides an element of concealment and surprise when descending from the cliff tops into the valley, where suddenly the view opens out and the rugged coastline comes into view. The proposed lodges are on the threshold of the transition where the views are most dramatic. Low ridge heights have been indicated to limit intrusion on the views but this has not been supported with details of proposed ground levels, lodge types and ridge heights to show how this will be achieved. The single section through the site is insufficient to support this proposal.

It is incorrect to state that the proposed lodges would be on the threshold of the transition where a viewer moves from the open countryside down into the enclosed bay. The road begins to descend into the bay at the south-eastern end of the garden wall at Old Linhead, or thereabouts. The first lodge would be down the hill about 76m south-east of this point. The top of the first lodge's roof would be lower than the adjacent road, and the road itself is several metres lower than, as well as 76m east of, the "threshold" at Old Linhead. The lodges would all be lower than the line of sight from any part of the road to any more distant view, for example the beach or the coastline beyond.

The Landscape Appraisal does not specify details of the lodge types or dimensions, other than to say that they would be "similar in design to those in the existing park". The existing and proposed lodges are of a standard design and size. The cross-section in the landscape report, and those in the submitted Architects Plus Proposed Design drawing, are based on the dimensions of the existing lodges.

Effects on visual amenity

The visual amenity of the proposal remains a concern from a number of viewpoints.

Fig 7.5 (view from the road close to Old Cambus West Mains) is an example of a view where the proposed extension will be seen separately from the existing site. It demonstrates how the extension will appear as a spur rising up out of the valley in this instance separated from the existing caravan park by its elevation and the intervening headland. Although it is a small part of a panoramic view and at some distance from the viewer there is the potential for the site to appear as an anomaly in the view and draw the eye of the viewer. The visualisations Fig 7.6 is a poor quality photograph in which the proposal is not well represented by the photomontage.

The image in Figure 7.6 is intended to give an impression of the likely effect of the development; it is not a formal photomontage to NatureScot standards and is not intended to be so. However, it was constructed using a CAD model of the development which ensures that the proposed lodges are correctly placed, scaled and oriented.

It is incorrect to state that the extension would appear "separated from the existing caravan park by its elevation and the intervening headland". In fact the higher lodges of the existing site can already clearly be seen from this point, adjacent to the proposed extension - not separated from it by the headland. We have provided, with this letter, a full sized copy of the visualisation and the original image upon which it was based, which demonstrate this clearly. Those images also show that the proposed lodges are depicted using tints and shades which are a good match to the existing, adjacent lodges. In this visualisation, the Flex-MSE retaining wall has actually been over-emphasised by being coloured plain grey when in fact it would be covered in vegetation. All of the other proposed landscape planting has also been left off this drawing for clarity, but in reality would assist with settling the development into the site.

Note that the upper lodges in the existing holiday park are in a variety of retiring colour schemes, not the stark whites and greys of the existing caravans in the lower parts of the site. The proposed lodges would replicate the appearance of the upper lodges, as shown.

In our opinion these figures, which represent a very small part of the wider view from Old Cambus West Mains, demonstrate that the magnitude of change in view would be negligible, as stated in our report.

Fig 7.8. For walkers, cyclists and drivers heading south east on the D149 the view of the site will be of roof tops below road level. For those heading north west on the same road the lodges will be seen stepping up the hill towards Old Linhead. Although the LVA describes the ridge heights remaining below road level to minimise intrusion in the view there is insufficient information to support this in the form of cross sections, building heights, retaining wall heights and proposed levels. For walkers on the D149 particularly those descending the road the lodges will appear close to the viewer. The scale of rooftops in close proximity to one another in addition to the hard construction of the access road, parking and retaining wall in my view may contribute to a greater magnitude of effects than described. The Armco roadside barrier and proposed fence may also exacerbate the negative effects. I have concern that the low planting proposed to allow retention of views may not sufficiently mitigate the proposal from these locations.

The Flex-MSE system allows vegetation to be planted directly into the top of the retaining wall itself, unlike traditional retaining wall systems. Gorse and low shrubs are proposed along the roadside so as to screen the barrier and the nearby roofs, without blocking more distant views. All of the roofs of the lodges would be lower than the adjacent road, so they would not interfere with views to any part of the landscape beyond.

Apart from the low planting along the roadside, more substantial planting is proposed at the western end of the site nearer to Old Linhead, as shown on the Planting Plan. This does not appear to have been taken into account in the Landscape Officer's response. The trees, when mature, would help to screen or at least filter views towards the site, both from the area around Old Linhead and for people travelling eastwards along the paths and the road. They would also help to screen or at least filter views of not only the proposed new park, but also the existing holiday park.

I'm not convinced by the photomontage 7.9 photographed in fairly overcast winter conditions where no element of parking, access road, terracing or decked areas are shown. The lodges also appear to be much further away from the road edge than shown in the drawings.

Attached to this letter is a copy of the CAD wireline image, generated from eye height (1.7m above ground level) at the photo location, which shows the topographical survey including the existing lodges, the terrace structure and the proposed lodges. It can be seen clearly that the photomontage has placed, scaled and orientated the proposed new lodges correctly in relation to the road, the existing lodges, the landscape and the buildings beyond.

I consider the magnitude of change for people travelling north westwards from Greenheugh Point is likely to be greater than assessed. From the east of Pease Bay where the coastal path meets the road the extent to which the development climbs up out of the 'bowl' will be seen clearly. The density of development with 2 rows of lodges will be more apparent from this location especially as views out from the lodges facing eastward will be desired, potentially limiting options for and success of mitigating planting.

It is incorrect to state that "where the coastal path meets the road the extent to which the development climbs up out of the 'bowl' will be seen clearly." In our report we correctly stated that for walkers approaching the road from the east the proposed site "would remain in view (apart from on the upper parts of the stairway [which brings the path down to the road]) until the path joins the D149." It would not be seen clearly, however: in fact the new extension would be almost entirely hidden by the existing lodges, due to the upwards vertical angle of view, and because the new lodges would be almost all behind and below the existing lodges in the view. Once walkers join the road the extension would be entirely hidden behind roadside trees and nearby existing

caravans. I attach a copy of a photograph from this location which clearly demonstrates these points.

Cumulative effects

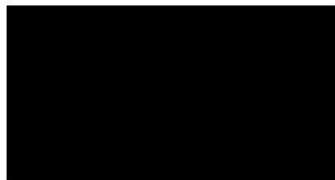
Cumulative visual effects would arise from some viewpoints and sequential effects from the footpath and road network. In my opinion these effects are likely to be considerable particularly on approach from Old Linhead south eastwards where the densely developed site would appear in the foreground of views of the existing caravan park. Cumulative effects may also be greater than assessed in local views when heading westwards on the Berwickshire Coastal Path where the site would be seen as an extension to the current caravan park leading up the hillside, albeit that it won't breach the cliff containment of Pease Bay. However cumulative effects should lessen over time if the proposed planting reaches maturity, never the less from a number of viewpoints this proposal will be seen as a significant extension to the existing situation having potential adverse impacts on visual amenity.

In our opinion, it is likely that the proposed screen planting at the western end of the site would reduce views of both the existing and the proposed sites, both for people approaching along the road and for people approaching along the clifftop path from the west. We have provided comments above about the effect on walkers approaching from the east.

I maintain my position from the previous applications in which I recommended that a single tier layout set further back from the road edge could be supported. This should enable a reduction in the extent and height of the terrace and retaining wall construction required. While I am generally satisfied with the approach to planting the additional space should allow further planting to screen, soften and filter the row of lodges in views and improve assimilation of the site into the wider landscape. A lower elevation for the lodges would also achieve a closer link visually to the existing caravan park where mitigation planting could relate to the wooded sides of the burn.

We stand by our appraisal and believe that the effects of the current scheme on landscape and views would be as we report them: small or negligible adverse, and in some cases slightly beneficial.

Yours sincerely,



Oliver Moffatt
Eden Environment Ltd