

**Planning Application No. 20/0538/OUT - Land off Spruce Close and Celia Crescent, Exeter  
LVA Review, Landscape Siting Considerations and Landscape Policy Review**

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**September 2021**

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**EXECUTIVE SUMMARY**

- a. My name is Anne Priscott, I am a chartered landscape architect with over 25 years experience. I have reviewed the LVA and proposals for this site at the request of Exeter City Council to address the landscape and visual impact issues relating to the proposed housing development on land off Spruce Close. Through my review I consider the effects of the proposed development upon the landscape and visual receptors and landscape related policy.
- b. A number of studies have been undertaken that underpin the Local Plan and the development policies set out within it. These evidence-base studies are appraised. They form a key part of the landscape analysis. The site straddles the southern corners of **Zones 4 and 6** identified in the **Exeter Fringes Study (2007)**.
- c. **Zone 4** is a very extensive zone that includes the site on the south-eastern edge, with **Zone 6** running east from the land covered by zone 4. The sensitivity of Zones 4 and 6 including the site is assessed as being high. High equates to: *key characteristics of landscape are very vulnerable to change and / or have significant value as a landscape resource*.
- d. The capacity for **Zone 4** is set at low, whereby the: *thresholds for change are very low and the area is unable to accommodate development without significant adverse effects*. The capacity of **Zone 6** is set at medium-low whereby the: *thresholds for change are low and development can be accommodated only in limited situations*.
- e. The **CEC 2013 Study** report concludes that the constraints on the lower-lying land of **Area 99** (Fields 1 and 2 of the site) are not absolute constraints and that parts of the area can be developed with appropriate design and very careful consideration in the design process of how the development of the site would influence the wider perception of the urban area and the urban fringe landscape around Exeter.
- f. The application documents were reviewed by the then Council's Place Making Officer Chris Westlake before he retired in spring 2021. His and the planning officer observations led to the revision of the scheme with three notable changes:
  - The addition of permissive access to the upper three fields above the site for quiet, unhindered, informal recreation;
  - The removal of housing on land above the 115m contour in Field 2; and
  - The modification of the access through the field north-west of Spruce Close that is currently used for informal recreation.
- g. The Application LVA, August 2019, was also updated to provide further information and winter photography of the viewpoints, in December 2019. Throughout the text of this review the original application illustrative plan is referred to as the Block Plan and the updated plan is referred to as the Illustrative Masterplan.
- h. The site is contained within the wider city area boundary, within the setting of the city, but it is located outside of, albeit adjacent to, the urban boundary identified on the **Local Plan Proposals Maps**.
- i. The site does occupy an elevated position on the slopes which are covered by **Policy Area LS1** that identifies land contributing to the **Landscape Setting of Exeter**.
- j. There is an overarching landscape and policy objective to protect important views to and from the hills surrounding the city of Exeter.
- k. The LVA sets out that the site merges into the well-treed slopes in long distant views from within Exeter and is obscured in views from the surrounding landscape setting. There are long distance views available from the hills that form this northern setting, including the site, looking south east, through to south, across Exeter to the surrounding hills and the Exe Estuary that forms its landscape setting. This is agreed.

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- l. The residual effects highlighted on page 33 of the LVA include *Likely alterations to the landform of the site to accommodate the proposed development. It is expected that while the alterations may be apparent they would be localised to around individual buildings and the overall character of the landform would still be recognisable as is the case with the existing development adjacent the site.* Should outline consent be granted it would be important at the reserved matters stage to design houses specifically for the site so that minimal landform cut and fill would be required.
- m. While the site does occupy an elevated location, having the potential to be viewed from within Exeter, the LVA author and my field observations have established that the ability to obtain views of the site from public locations are extremely limited (current site access is at the gift of the landowner).
- n. There is a policy objective to protect the landscape's rural character in close proximity to urban areas by resisting piecemeal urban expansion and recreational developments which undermine landscape patterns and sense of place. This is one of the starting points when reviewing this development in relation to the landscape, views and policy objectives.
- o. Therefore, having reviewed the LVA and policy objectives of the City Council, the development as proposed could accord with the objectives of Policy LS1 of the Exeter Local Plan First Review and Policy CP16 of the Exeter Core Strategy. The development would not result in harm to the character and local distinctiveness of this rural area, and the addition of the three fields north and west of the site (Fields 1 and 2) for unhindered quiet recreation in perpetuity would contribute to the public enjoyment and access to the urban fringe. This would be highly beneficial. This would prevent any land above the 115m AOD contour from ever contributing to the urbanisation of the area and detracting from the rural green hillside setting.
- p. In this regard, the development would accord with Policies LS1 & LS4 of the Exeter Local Plan First Review and CP16 of the Exeter Core Strategy. The creation of vehicular access on the south-western side of the site onto Celia Crescent would not create unacceptable adverse impacts and that, with careful design and sympathetic consideration of pedestrian amenities, the highly valued spaces adjacent to Spruce Close could maintain a high quality.
- q. The development of the site for up to 93 residential units in this location would result in the loss of two sections of linear boundary feature fronting onto Celia Crescent and dividing the two fields. This would be only slightly detrimental to the visual landscape character and appearance of the area, partially mitigated by the presence of Dutch elm disease and ash die-back highlighting the need for remedial works at some point in the future in this part of the site. This landscape change will require both landscape mitigation and landscape enhancement through an appropriate landscaping scheme using native species, to provide long-term mitigation, and overarching landscape maintenance and enhancement that would secure long-term landscape quality gains.
- r. Clearly there is a stated intention in Policy CP16 that the hills forming the setting of the city are to be protected. This is unequivocal. In addition, the Core Strategy Key Diagram clearly shows the combination of the landscape setting and valley parks as being fundamental elements in maintaining the objectives set out in para 4.11 of the Core Strategy, *by: (4<sup>th</sup> bullet point) steering development away from the hills to the north and north west that are strategically important to the landscape setting and character of the city.*
- s. All of the planning policies, development plan evidence base documents, the landscape character assessments and planning application advice has been consistent in showing graphically and documenting this strategy. However, careful detailed site analysis has shown that the parts of Fields 1 and 2 that form this application on the revised Illustrative Masterplan are so well related to the urban fringe that they can be developed without unacceptably impacting on the policy objectives of the Core Strategy. As part of this application the securing of public access to a further three fields to the north of the site will bring appreciable gains and will form a permanent upper development line at c 115m AOD that will not be breached.

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- t. This in no way sets a precedent for any other part of the landscape in the LS1 area or the land referenced in paragraph 4.11 of the Core Strategy, and the conclusions drawn are specific to this site and the development area illustrated.
- u. Taking this back to the national level, the NPPF (2021) states clear objectives, in relation to achieving well-designed spaces, at paragraph 130. Should the site be consented for outline planning, the reserved matters application could and should deliver the design and landscape enhancement objectives of both policy DG1 and paragraph 130 of the NPPF.
- v. The effects of the proposed development have been assessed by the LVA author and through a review and found to be very localised, having a moderate impact on the valued landscape characteristics and minimal impacts on views from within the landscape and of the setting of the city. The proposed siting within the context of retained traditional hedgebanks will allow the development to be relatively smoothly assimilated into the local landscape.

Anne Priscott (CMLI)

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### Introduction

- 1 Outline application for up to 93 residential dwellings (Approval sought for details of access only, with scale, layout, appearance and landscaping all reserved for future consideration) (Revised Scheme) has been submitted to Exeter City Council. The following document sets out a review of the landscape character assessment and landscape policy relating to the site and the proposed development, a review of the Illustrative Masterplan, landscape impact documentation and other relevant documents submitted with the application to assist the planning case officer in determining the application.
- 2 Throughout the text of this review the original application illustrative plan is referred to as the Block Plan and the updated plan is referred to as the Illustrative Masterplan.

### Introduction to the Relevant National and Regional Landscape Designations within the Study Area

#### Development Plan Policies

- 3 **The National Planning Policy Framework** (February 2021) sets out the overarching policies and guidelines within which the proposed development would sit.
- 4 The NPPF (2021) states, in relation to conserving and enhancing the natural environment, at paragraph 174 that: *Planning policies and decisions should contribute to and enhance the natural and local environment by:*
  - a) *protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
  - b) *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
  - c) *maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
  - d) *minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*
  - e) *preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
  - f) *remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.*

## Development Plan Policies

### The Exeter City Council Local Plan

- 5 Chapter 11 of the Exeter City Council Local Plan sets out that the landscape setting and nature conservation objectives of the plan are to protect the features and characteristics of the countryside which form the setting of the City and which establish its distinctive identity; and to protect sites and features of nature conservation importance.
- 6 Paragraph 11.4 records that: *The Council has carried out a landscape appraisal of all open countryside in and around the City. Based on this appraisal, open land is identified which is to be protected from development because of its intrinsic merit and its contribution to the distinctive landscape setting of the City.*
- 7 The site straddles the southern corners of **Zones 4 and 6** identified in the **Exeter Fringes Study** (analysed below).
- 8 The plan sets out at paragraph 11.5: *The continuous nature and sheer size of hills to the north are of major landscape significance, providing the largest and most important part of the landscape setting and containment of the City, which is so essential to its character. The hills extend for 5 kilometres east to west and represent about one eighth of the City Council area outside the urban limit. Although physically separated, this area continues west of the River Exe Valley to include the hills to the north and west of Exwick. Together with the lower lying land of the adjoining valleys of the River Exe, Culm and Clyst, the landscape also forms an integral part of the wider rural scene. By containing the urban area, the hills, which are themselves intrinsically attractive, preserve the pastoral landscape of a large part of East Devon. The links with the Valley Parks (see 7.7-7.22) enhance their value by bringing the countryside well into the built-up area of the City.*
- 9 The plan sets out at paragraph 11.11: *The appraisal above demonstrates that the open land around Exeter performs a variety of roles including the separation of settlements, maintaining distinct identities and enabling informal recreation. It contains high quality agricultural land and land of nature conservation importance. Overall, it contains land of intrinsic landscape merit which provides the setting for the City as a whole and for local areas. It is the combination of these roles and qualities and their relationship with, and importance to, the population of the adjoining urban area which establishes the unique nature of this land compared to the wider countryside and merits its protection from inappropriate development.*
- 10 The plan sets out at paragraph 11.12: *Development in these areas will not be permitted unless it maintains local distinctiveness and character. Local distinctiveness is that which sets a locality apart from anywhere else. Acceptable uses will be concerned with agriculture or forestry, the change of use, conversion or appropriate extension of buildings or the provision of infrastructure. The Council wishes to encourage rural*

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*enterprise and will allow for the re-use or adaptation of agricultural, horticultural and other rural buildings for new uses, providing their form, bulk and general design are in keeping with their surroundings and the landscape quality of the area is protected. Active outdoor recreation will also be permitted, subject to certain safeguards (see 11.14).*

**Policy LS1**

- 11 **Policy LS1** states that: *Development which would harm the landscape setting of the city will not be permitted. Proposals should maintain local distinctiveness and character and:*
- 12 *(a) be reasonably necessary for the purposes of agriculture, forestry, the rural economy, outdoor recreation or the provision of infrastructure; or*
- 13 *(b) be concerned with change of use, conversion or extension of existing buildings:*
- 14 *Any built development associated with outdoor recreation must be essential to the viability of the proposal unless the recreational activity provides sufficient benefit to outweigh any harm to the character and amenity of the area.*

**The Exeter City Council Core Strategy**

- 15 The Exeter City Council Core Strategy policies are relevant to the development proposals.
- 16 Paragraph 2.27 records that: *The city enjoys a high-quality environment, with valley parks, formal city parks, the Exeter Ship Canal, the Exe Estuary and important wildlife sites. The hills to the north and north west of the city, particularly the ridgelines, give Exeter a distinctive character. The city's varied terrain, influenced by the River Exe and its tributaries, add to its appeal.*
- 17 Paragraph 10.35 records that: *The Exeter Local Plan First Review identifies several areas of open land, designated as 'Landscape Setting', to be protected from development because of their intrinsic merit and their contribution to the distinctive landscape quality of the city. These were identified following landscape appraisal studies carried out in 1997 and 1999.*
- 18 Paragraph 10.36 records that: *This issue is thoroughly reviewed in the 2007 Landscape Sensitivity and Capacity Study, which assesses robustly the qualities of the landscape and identifies the extent to which each area has capacity to accommodate development. The study provides the detailed evidence that supports the protection of areas of landscape sensitivity including those areas that provide the strategic landscape setting for the city.*
- 19 Paragraph 10.37 records that: *These areas, which continue to be designated as 'Landscape Setting', include part of the Clyst Valley, Knowle Hill and the hills to the north and west which have a particularly important role to play in forming an attractive green setting for the city, in addition to their intrinsic landscape value. They are complemented by seven designated Valley Parks that provide 'green lungs' within the city, make an important contribution to biodiversity, provide formal and casual recreation opportunities, and are readily accessible by foot or cycle.*

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- 20 Paragraph 10.39 records that: *The Spatial Strategy (see Section 4) provides for growth to the east and south west of the city in those areas that the Landscape Study concludes are of medium to low landscape sensitivity and have medium to high capacity for development. The 'Landscape Setting' designation in these areas is, accordingly, deleted. Any development in the remaining designated areas, must ensure that the character and local distinctiveness of these areas is protected and enhanced. Further guidance will be set out in the Development Management DPD.*

**Policy CP16**

- 21 **Policy CP16** states that: *The strategic green infrastructure (GI) network is shown on the key diagram. The Exeter GI network has been identified to protect and enhance current environmental assets and local identity and to provide a framework for sustainable new development.*

*GI will be an integral part of planning for the urban extensions at Monkerton/Hill Barton, Newcourt and Alphington. New multifunctional areas of green space and green corridors will be created to meet the needs of these new communities. A sustainable movement network will link the urban area to the urban extension and beyond to the open countryside. To the east of the city green corridors, that incorporate multi-use trails (for cycling, walking and horse riding) and provide high quality biodiversity habitat, will link Exeter to the proposed Clyst Valley Park and on to Cranbrook.*

- 22 *The character and local distinctiveness of the areas identified below, will be protected and proposals for landscape, recreation, biodiversity and educational enhancement brought forward, in accordance with guidance in the Green Infrastructure Strategy, through the Development Management DPD:*

- *the hills to the north and north west;*
- *Knowle Hill to the south west;*
- *the strategic gap between Topsham and Exeter;*
- *and the Valley Parks: Riverside, Duryard, Mincinglake, Ludwell, Alphington to Whitestone Cross, Savoy Hill and Hoopern.*

- 23 *The Exe Estuary European Site will be protected. Development that is likely to have a significant effect on the integrity of the Exe Estuary, East Devon Pebblebed Heaths/East Devon Heaths or Dawlish Warren European sites will be subject to the Habitats Regulations 2010 and the requirement East therein to undertake a Habitat Regulations Assessment. Contributions will be sought from new development towards management and other measures at the Exe Estuary, Dawlish Warren and Pebblebed Heaths and at other European sites as may be justified by the emerging evidence base.*

- 24 *The biodiversity value of Stoke Woods and Bonhay Road cutting SSSI, and all other sites of national, regional and local conservation importance will be protected, and unavoidable impacts mitigated and compensated for, in accordance with their relative status.*

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25 *Biodiversity enhancement areas, for the restoration or creation of new priority habitats, will be identified within the strategic nature areas to the north of the city and in other areas of biodiversity and geological interest. Proposals for these areas will be brought forward through the Development Management DPD.*

26 *Opportunities to provide green corridors, open space and allotments, to enhance cycling and walking opportunities, to link existing habitats, to incorporate environmental assets and to integrate biodiversity, proposed by the Exeter Green Infrastructure Strategy, will be secured through partnership working, direct implementation and the application of Policy CP18 (see Section 11).*

### **Evidence Base Used by Exeter City Council in formulating their Local Plan.**

27 A number of studies have been undertaken that underpin the Local Plan and the development policies set out within it. These evidence-base studies are now appraised. They form a key part of the landscape analysis.

The Exeter Local Plan First Review and the Core Strategy make reference to landscape appraisals that have been used to inform the approach followed by the Council in formulating their strategy for managing landscape and green infrastructure issues.

### **Appraisal of the Landscape Policy Areas and Valley Parks (August 1997)**

28 The **Appraisal of the Landscape Policy Areas and Valley Parks (August 1997)** document sets out an appraisal of all the land within the environs of Exeter that was designated in the Exeter Local Plan First Alteration (Adopted November 1993). The document contains an appraisal of 23 parcels of land, including the valley parks all combined into area 23.

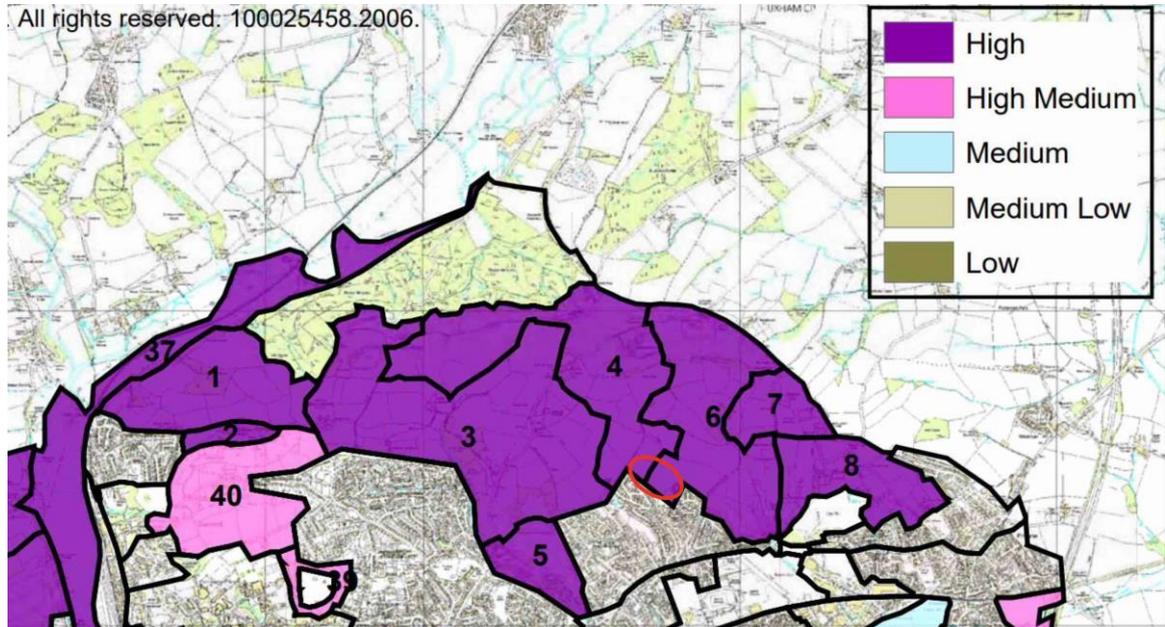
### **Exeter Fringes Study (February 2007)**

29 **The Exeter Fringes Study** (February 2007) formed part of the supporting studies for the Core Strategy, and assessed the landscape sensitivity and capacity of the, predominantly, greenfield, fringe areas of the City, updating the 1997 study. The objective of the study was to: *Assess the capacity of the landscape around the fringes of Exeter to accommodate development and to identify those landscapes that should be protected from development, taking into account the value of these landscapes and their sensitivity to change.* The study records at paragraph 1.3 how the City is under significant pressure from development and that there is a need to provide a sound landscape basis to determine which greenfield areas are appropriate for development and those that do not have capacity for development.

30 In this study sensitivity is taken to mean the landscape sensitivity itself, the inherent sensitivity to any change and the capacity relates to the ability of the landscape to accommodate different forms or amounts of change, whether housing or industry.

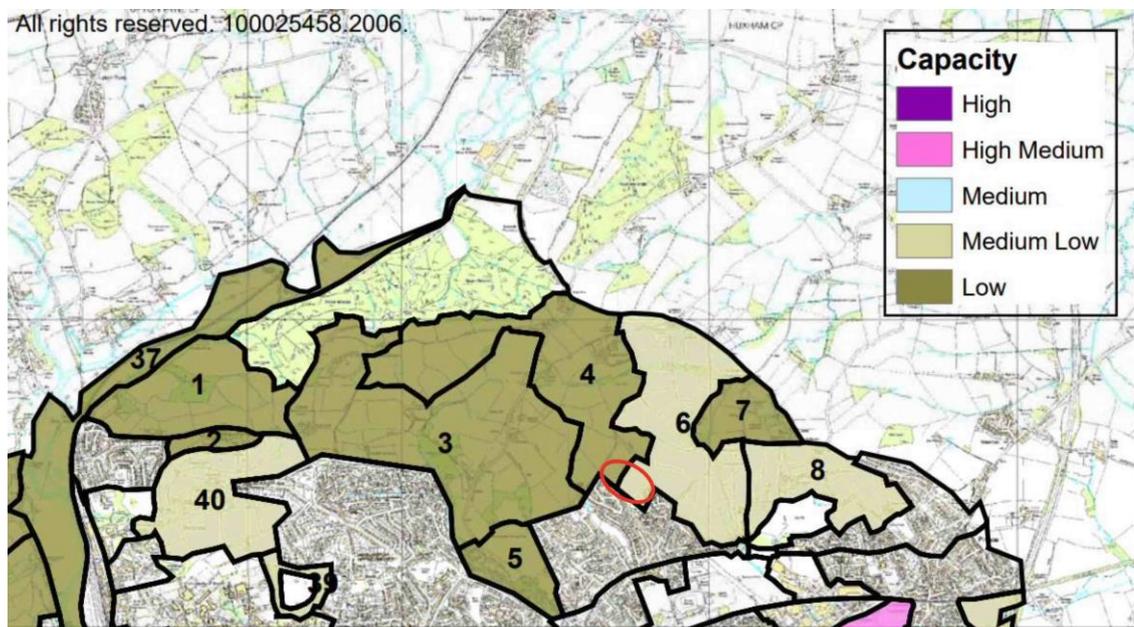
31 The study considered and reported on 44 zones in the assessment. **Figure 3: Exeter Fringes Study (February 2007) Assessment Zones** shows the parcels of land considered around Exeter, with the application site located within an area identified as **Zone 4/6**.

Figure 3: Exeter Fringes Study (February 2007) Assessment Zones – landscape sensitivity



32 **Zone 4** is a very extensive zone that includes the site on the south-eastern edge, with **Zone 6** running east from the land covered by zone 4. The sensitivity of Zones 4 and 6 including the site is assessed as being high. High equates to: *key characteristics of landscape are very vulnerable to change and / or have significant value as a landscape resource.*

Figure 4: Exeter Fringes Study (February 2007) Assessment Zones – housing capacity



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- 33 The capacity for **Zone 4** is set at low, whereby the: *thresholds for change are very low and the area is unable to accommodate development without significant adverse effects*. The capacity of **Zone 6** is set at medium-low whereby the: *thresholds for change are low and development can be accommodated only in limited situations*.
- 34 It might be argued that due to the large size of the zones some of the assessments must represent an average measure of sensitivity, and that rather than accurately assessing the precise capacity of all of the parcels of land within the zone, generalisations will have been drawn. There is some merit to this argument. However, under the justification section the report records for Zone 4 that the: *Prominent hill and valley sides with high intrinsic sensitivity form strong positive rural backcloth to the city. The area has no capacity for housing because of its prominence, rural character and intrinsic sensitivity*.
- 35 This is an absolutely unequivocal statement that goes beyond saying low capacity to articulate no capacity for change of an urbanising form, setting out that the skyline forms a strong backcloth to the city and that it is a highly visible zone. Reinforcing the Council's view that the hills to the north and west have a particularly important role to play in forming an attractive green setting for the City, in addition to their intrinsic landscape value.
- 36 However, the justification section the report records for Zone 6 that the: *Prominent hill and valley sides with high intrinsic sensitivity form strong positive rural backcloth to the city. The area has very limited capacity for housing because of its prominence, rural character and intrinsic sensitivity*. (my emphasis)
- 37 The study offers both broad initial conclusions and provides a very robust starting point for more the site-specific analysis for these two fields set next to each other, set out below.

**CEC Visual Evaluation Report (September 2013)**

- 38 **The CEC Visual Evaluation Report** (September 2013) produced a Visual Land Parcel Evaluation of a number of sites that the Strategic Housing Land Availability Assessment (SHLAA) had previously identified as unsuitable for development under the current strategic planning policy, but that developers had shown interest in bringing forward.
- 39 The sites were assessed in terms of their visual value and their visual susceptibility in order to identify their visual sensitivity. The site that is the subject of this application covers Area 99, Land north of Beacon Heath, **Figure 5**.
- 40 This study identifies the visual value and susceptibility of the site to development. It identifies key views being from the northern parts of the area, areas that do not form part of the built zone shown on the revised Illustrative Masterplan. The disadvantage of this study is that it considers the five fields as one area, and the visual sensitivities and susceptibilities are different in different parts of Area 99, as would be anticipated for a parcel of land that ranges from c 95m AOD to over 140m AOD. It identifies in the text

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(Figure 6) that the fields higher up are more visually exposed and make a greater contribution to the setting of the city. I concur with this view.

**Figure 5: Area 99 of the 2013 Exeter Visual Site Evaluation Study by CEC.**



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**Figure 6: Area 99 of the 2013 Exeter Visual Site Evaluation Study analysis.**

Visual Value Site 99

Group	Criterion	Value Rating Site 99		
		High	Medium	Low
Visual amenity	Visual exposure of site		Medium level of exposure, some areas enclosed with some views in and out (lower slopes and those screened by hedge banks and trees not exposed, higher elevations are)	
	Role of site and its features in local visual amenity		Some contribution – medium (defining boundaries with estates, tall trees a feature, informal use by local residents)	
	Role of site and its features in wider area visual amenity	Important contribution – high (rural landscape perceived on northern slopes with good tree cover)		
	Contribution to perception of urban fringe landscape and visually cohesive appearance	Important contribution and good visual coherence across site – high (part of Stoke Hill to Beacon Hill ridge defining northern edge of Exeter)		
Views	Views towards the site from local area		The site features in some local views – medium (well screened from estates by treed boundaries, not many publicly accessible areas in landscape)	
	Views towards the site from wider area	The site features in many wider area views – high (slopes and ridge visible from southern landscapes and adjacent valley)		
	Vantage points and important views from high value receptors	There are open and direct views of the site from vantage points and within key views in the area – high (northern ridge of Exeter can be seen in many northern views from high sensitivity areas such as AONB, estuary, Haldon, and site forms part of that ridge)		

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Visual Susceptibility Site 99

Group	Criterion	Susceptibility Rating Site 99		
		High	Medium	Low
Visual receptors	Visual receptors – linear features			Very few – low (no roads or formal footpaths with views)
	Visual receptors - residents		Some – medium (views from adjacent estates limited due to dense boundaries)	
	Visual receptors - other	High value receptors affected such as vantage point users – high (views towards northern ridges of Exeter from southern landscapes)		
Site features and visual exposure	Linear features such as hedges and tree belts	Many linear features including some across the site – high (strong field pattern with old boundaries and many mature oaks)		
	Woodlands and other area vegetation		Localised small woodland or other vegetation features – medium (small woodland areas along streams)	
	Elevation		Site on lower slopes with some wider area visibility – medium (upper field areas with long views south, but lower field areas fully screened, site not on top of the ridge)	

Visual Sensitivity Site 99

		Value		
		High	Medium	Low
Susceptibility	High	<b>Very high sensitivity</b>	<b>High sensitivity</b>	<i>Medium sensitivity</i>
	Medium	<b>High sensitivity</b>	<b>Medium sensitivity</b>	<i>Low sensitivity</i>
	Low	<i>Medium sensitivity</i>	<i>Low sensitivity</i>	<i>Very low sensitivity</i>

41 The conclusions to this report identify that Area 99 has medium to high visual value, and visual susceptibility and medium to very high sensitivity. In this report the lowest sensitivity identified is very

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low, and therefore the full range of sensitivity values has been used. In the visual constraints ranking exercise undertaken the site comes out as 2 on a scale of 4, having several constraints.

- 42 The report concludes that the constraints on the lower-lying land of Area 99 are not absolute constraints and that parts of the area can be developed with appropriate design and very careful consideration in the design process of how the development of the site would influence the wider perception of the urban area and the urban fringe landscape around Exeter.

### Conclusions I have Reached on the Council's Documented Landscape Policy Evidence Base

- 43 Based on the assessment of the 44 zones, the Exeter Fringes Study records conclusions in a series of plans covering the whole of the Exeter City Council area. This shows that the most sensitive areas with the least or no capacity were identified as the line of hills to the north and north west of the City, including the land covered by the north-western field, Field 2, of the application site.

- 44 The Core Strategy confirms that the Exeter Fringes Study forms the evidence base used to determine the strategic locations for growth around Exeter. It states that the Exeter Fringes Study: *robustly assesses the qualities of the landscape and identifies the extent to which each area has capacity to accommodate development. And that it: provides the detailed evidence that supports the protection of areas of landscape sensitivity including those areas that provide the strategic landscape setting for the city.*

- 45 All of these studies acknowledge that Exeter has been and remains under significant pressure to identify development land, so it is important to note that the need to identify suitable land for development as well as protecting the more sensitive areas underpinned the overall objectives of all of the studies.

- 46 Chronologically it becomes evident that land has been consented and developed firstly on the least sensitive sites and latterly on some of the more valued and more sensitive locations. None of Zones 4 or 6 have been released for housing development.

- 47 The approach advocated by this suite of policy and guidance documents has been used in the following review.

### LVA Review

- 48 The application documents were reviewed by the then Council's Place Making Officer Chris Westlake before he retired in spring 2021. His and the planning officer observations led to the revision of the scheme with three notable changes:

- The addition of permissive access to the upper three fields above the site for quiet, unhindered, informal recreation;
- The removal of housing on land above the 115m contour in Field 2; and
- The modification of the access through the public open space north-west of Spruce Close that is currently used for informal recreation.

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49 The LVA (August 2019) was also updated to provide further information and winter photography of the viewpoints in December 2019.

**Landscape Siting Considerations / Review**

50 I broadly concur with the applicant's visual sensitivity analysis on **Figure 7: Key Sensitivities**, reproduced below for ease of reference at **Figure 7**. I am assuming that the sensitivity levels ascribed are relative across the site and not relative across the fringes. I do not agree that any parts of the site are of low sensitivity to development. The site would be far more visible than identified in the LVA from the north when looking south from **Viewpoint 2bi** (looking south-east from the public open space proposed north of the site). This is currently a private view, from a location on the Illustrative Masterplan that would be afforded public access in perpetuity. The photographs included clearly show how the setting to the city would change in views from this land through the development of Fields 1 and 2.

**Figure 7: Key Sensitivities (red high, yellow lower) and location of Viewpoint 2bi**



51 The most sheltered parts of the site adjacent to Celia Crescent and Spruce Close, across the public open space adjacent to Juniper Close, are still of medium to high sensitivity. In this regard, the houses indicated in the north-western part of the site on the Block Plan were higher on the slope, and in an area of high sensitivity, and in an area where the balance between localised impact would spill over into harmful impact on the objectives of maintaining the setting of the city. This housing has been removed from the

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revised Illustrative Masterplan, and here the housing upper development zone proposed sits far less uncomfortably with the sensitivity analysis than with the proposals initially shown on the Block Plan.

### Access

- 52 The setting of the access road across the public open space adjacent to Juniper Close would change this space from a quiet area for recreation to an access route (see ES Photo VP1 ai). The change in road route from the application Block Plan drawing to the current Illustrative Masterplan is beneficial. The revised route would skirt around the valued established individual trees in the centre of the space, enable ¾ of the space to be south of the road and to retain more of the meaningful quiet recreation potential for this space. Should the application be consented the maintenance of as much of the tranquillity and parkland character in this space as possible at the detailed design stage, and ease of access on foot, would be beneficial to the community and should be a priority.
- 53 The loss of the landscape value of the trees along Celia Crescent (Area A17 on the arboriculture survey plan) to be removed to allow access into the site can be mitigated through tree planting as part of the overall reserved matters scheme and would have minimal impacts on views. These few trees have ash die-back or Dutch Elm Disease and would have required removal regardless of the application.

### Landscape and Visual Policy Review Landscape Siting Considerations

- 54 The LCA covering the site and the landscape on the northern fringes of Exeter is identified as **Exeter Slopes and Hills** which is broadly described as an elevated area above the surrounding urban areas, offering views across Exeter city and the Exe Estuary. The distinctive views, strong topography, notable woodland and proximity to Exeter contribute to a strong sense of place. Despite the proximity to Exeter this landscape has a strong rural character. In terms of special qualities and features, the LCA identifies that the area is of high value for recreation in close proximity to the city.
- 55 In response to this, the applicant's landscape assessor rightly notes that: *There are no formal footpaths crossing through or adjacent the site but the site and the surrounding fields are currently used for informal recreation.*
- 56 Potential new built development, including residential expansion on the edge of Exeter, which could be highly visible within this elevated landscape and require further infrastructure, is identified as a potential force for change.
- 57 The site is contained within the wider city area boundary, within the setting of the city, but it is located outside of, albeit adjacent to, the urban boundary identified on the Local Plan Proposals Maps.
- 58 The site does occupy an elevated position on the slopes which are covered by Policy Area LS1 and Policy CP16 that identifies land contributing to the Landscape Setting of Exeter and seeks to protect the setting of the city.

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- 59 There is an overarching landscape and policy objective to protect important views to and from the hills surrounding the city of Exeter.
- 60 The LVA sets out that the site merges into the well-treed slopes in long distant views from within Exeter and is obscured in views from the surrounding landscape setting. There are long distance views available from the hills that from this northern setting, including the site, looking south east, through to south, across Exeter to the surrounding hills and the Exe Estuary that forms its landscape setting. This is agreed.
- 61 The residual effects highlighted on page 33 of the LVA include *Likely alterations to the landform of the site to accommodate the proposed development. It is expected that while the alterations may be apparent they would be localised to around individual buildings and the overall character of the landform would still be recognisable as is the case with the existing development adjacent the site.* It would be important at the reserved matters stage to design houses specifically for the site so that minimal landform cut and fill would be required.
- 62 While the site does occupy an elevated location having the potential to be viewed from within Exeter, the LVA author and my field observations have established that the ability to obtain views of the two fields proposed for development from public locations other than the land proposed for recreation (Fields 3, 4 and 5) are extremely limited.
- 63 There is a policy objective to protect the landscape's rural character in close proximity to urban areas by resisting piecemeal urban expansion and recreational developments which undermine landscape patterns and sense of place. This is one of the starting points when reviewing this development in relation to the landscape, views and policy objectives.
- 64 The site is currently used as pasture, with permitted/unhindered access gifted by the landowner to the local community across all five field parcels (See **Figure 8**). I agree with the LVA conclusion that to a degree the sense of tranquillity in this area is disturbed by the nearby development and that it does contribute to the landscape setting from within the settlement. I would suggest the western and northern field parcels (Fields 3, 4 and 5) of the five-field site shown on the Illustrative Masterplan make a significant contribution to the setting.
- 65 The two-field development area of the site currently occupies the lower edge of the undeveloped upper slopes where the landscape setting meets the residential development on the low-mid slopes. These upper slopes have a well- wooded appearance that the sites field boundaries currently contribute to.
- 66 There are currently tall and well-established hedges with trees defining all boundaries that should be protected and retained due to their positive contribution to the character of the landscape setting of Exeter. To develop the site some hedgerow tree / hedgebank loss is inevitable. The Illustrative Masterplan shows how the site can be developed with minimal hedge loss. This should be seen as a priority when delivering the reserved matters application should the outline application be consented.

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- 67 The policy objectives include to plan to ensure the sensitive location of new development and particularly new urban extensions of Exeter, avoiding prominent open ridges and slopes (extracted from Devon landscape character assessment for the Exeter Slopes and Hills area, under the heading Guidelines: Plan).
- 68 The site occupies an elevated location towards the higher slopes on the northern edge of Exeter but, as noted in the LVA, does not sit on the ridgeline. While it is currently open it sits within and is obscured by the hedges and trees that define the sites boundaries and contribute to the wooded appearance of the slopes that form the setting of Exeter.
- 69 The Illustrative Masterplan provides for a network of green spaces and green infrastructure links, in Fields 3, 4 and 5, to support the current and future population of Exeter whilst integrating new development in Fields 1 and 2 into the landscape. This would secure a very positive contribution in terms of public access to open space for quiet recreation in perpetuity and would secure the land and prevent any further development on the higher slopes above that zoned in Fields 1 and 2. Effectively it would protect the setting of the city for generations.

**Figure 8: Illustrative Masterplan (with field number)**



### Conclusions

- 70 Drawing conclusions from having reviewed the application documents, the revisions made between the Block Plan and the Illustrative Masterplan, in terms of more sensitive access from Spruce Close and limits on the upper development levels to 115m AOD, and the securing of public access over three further fields in perpetuity, are beneficial and an improvement on the original application. The LVA observation that

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(LVA Page 34): *The site is located within Policy Area LS1 and Zone 4 and 6 of the Fringes Landscape Sensitivity and Capacity Study. The Baseline Study set out that the conclusions made in the Fringes Study are quite broad-brush and the site would have more capacity to accommodate development than the more elevated slopes surrounding it, is a fair statement.*

- 71 The site is contained within the wider city area outside of, but adjacent to, the urban boundary identified on the Local Plan proposals maps. It occupies an elevated position towards the higher slopes abutting the northern edge of the suburban residential area that currently forms the northern extent of the city and is covered by Policy Area LS1 that identifies land contributing to the Landscape Setting of Exeter.
- 72 As the LVA author identifies, under the heading of Design Principles, the Local Plan First Review discusses landscape in relation to design proposals. It states that landscape design is a principal consideration of development, the starting point of which is the quality and character of the existing landforms (hills, valleys and slopes), vegetation and other natural features.
- 73 It is easy to observe that Exeter's hilly terrain strongly influences its townscape and that views and glimpses almost at every turn change with the topography. Green spaces do penetrate built up areas, however, there is a ubiquitous character to the housing on the edges of the site around Spruce Close. The new road access, if consented, would run through this area. The road route has been revised between the application Block Plan and the Illustrative Masterplan, this revision has secured a larger area of open space on the southern side of the road route. However, there is still potential to greatly improve the interface between the access road and Spruce Close, through careful detailed landscape design, particularly on the road approach from the south-east. Here planting on the wide verge space would enhance the character of Spruce Close through the addition of native trees.
- 74 When travelling through the city the surrounding green hills are clearly visible from the centre and there is significant tree cover in the older residential areas. The LVA identifies that LS1 goes on to explain that development proposals should work with the existing contours rather than relying on extensive cut and fill and that landscape works should aim to enhance the setting of both the proposed development and the surrounding area. This is a very important consideration to be carefully designed at the reserved matters stage. The site would require carefully considered hard landscape works and new planting allied to the conservation of important existing natural features could be used to enhance the character and appearance of the new development and promote local distinctiveness. These are not matters that can be resolved at the outline stage, however are able to be sought at the reserved matter stage as part of the overall master planning.
- 75 In relation to the Objectives of Urban Design, Saved Policy DG1 states: Development should:
- a) be compatible with the urban structure of the city, connecting effectively with existing routes and spaces and putting people before traffic;*

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- b) ensure that the pattern of street blocks, plots and their buildings (the grain of development) promotes the urban character of Exeter;*
- c) fully integrate landscape design into the proposal and ensure that schemes are integrated into the existing landscape of the city including its three-dimensional shape, natural features and ecology;*
- d) be at a density which promotes Exeter's urban character and which supports urban services;*
- e) contribute to the provision of compatible mix of uses which work together to create vital and viable places;*
- f) be of a height which is appropriate to the surrounding townscape and ensure that the height of constituent part of buildings relate well to adjoining buildings, spaces and to human scale;*
- g) ensure that the volume and shape (that massing) of structure relates well to the character and appearance of the adjoining buildings and the surrounding townscape;*
- h) ensure that all designs promote local distinctiveness and contribute positively to the visual richness and amenity of the townscape;*
- i) use materials which relate well to the palette of materials in the locality and which reinforce local distinctiveness.*

- 76 In this regards, should the site be consented for outline planning, the reserved matters application could and should deliver the objectives of policy DG1.
- 77 This could be achieved in landscape terms through a landscape design using native tree species and shrubs to develop a well-treed fringe that will give the dwellings proposed on this site a greater sense of place and connection to the landscape than the houses already on the urban fringe where there is a general lack of landscaped spaces reflecting local distinctiveness. The policy wording seeks to ensure that all designs promote local distinctiveness and contribute positively to the visual richness and amenity of the townscape. This is achievable through using the spaces around the 93 dwellings for planting with both native canopy trees such as oak and a mix of smaller trees, including fruit trees, as an understorey where large spaces for planting allow, or along street spaces and between dwelling groups.
- 78 The policy also advocates the use of materials which relate well to the palette of materials in the locality and which reinforce local distinctiveness. To achieve landscape enhancement and deliver local distinctiveness the use of Devon hedgebanks as well as walls and other hard surfaces would help to integrate the development into the fringe.
- 79 The creation of a Devon hedgebank on the southern side of the access road running through the open space north of Spruce Close might help create a clear but soft edge to the recreation parts of this compartment, maintaining tranquillity in this highly valued space. Over time, if planted with native hedge plants and oak trees, the access would become a high quality linking space.

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- 80 Therefore, having reviewed the LVA and policy objectives of the City Council, the development as proposed could, for the reasons set out here, accord with the objectives of Policy LS1 of the Exeter Local Plan First Review and Policy CP16 of the Exeter Core Strategy. The development would not result in harm to the character and local distinctiveness of this rural area, and the addition of the three fields north and west of the development site for unhindered quiet recreation in perpetuity would contribute to the public enjoyment and access to the urban fringe. This would be highly beneficial. This would prevent any land above the 115m AOD contour from ever contributing to the urbanisation of the area and detracting from the rural green hillside setting.
- 81 In this regard, the development would accord with Policies LS1 & LS4 of the Exeter Local Plan First Review and CP16 of the Exeter Core Strategy. The creation of vehicular access on the south-western side of the site onto Celia Crescent would not create unacceptable adverse impacts and with the careful design and sympathetic consideration of pedestrian amenities highlighted in paragraphs 77-79 above, the highly valued spaces on and off site adjacent to Spruce Close could be enhanced through good landscape design.
- 82 The development of the site for up to 93 residential units in this location would result in the loss of two sections of linear boundary feature fronting onto Celia Crescent and dividing the two fields. This would be only slightly detrimental to the visual landscape character and appearance of the area, partially mitigated by the presence of Dutch elm disease and ash die-back highlighting the need for remedial works at some point in the future in this part of the site. This landscape change will require both landscape mitigation and landscape enhancement through an appropriate landscaping scheme using native species, to provide long-term mitigation, and overarching landscape maintenance and enhancement that would secure long-term landscape quality gains.
- 83 Clearly there is a stated intention in Policy CP16 that the hills forming the setting of the city are to be protected. This is unequivocal. In addition, the Core Strategy Key Diagram clearly shows the combination of the landscape setting and valley parks as being fundamental elements in maintaining the objectives set out in para 4.11 of the Core Strategy: *The aim is to enable the city to grow without damaging those environmental assets that, to a large extent, generate the opportunities and pressures for growth. Accordingly, proposals for development are identified, based on giving priority to sustainable locations, by: (4<sup>th</sup> bullet point) steering development away from the hills to the north and north west that are strategically important to the landscape setting and character of the city.*
- 84 All of the planning policies, development plan evidence base documents, the landscape character assessments and planning application advice has been consistent in showing graphically and documenting this strategy. However, careful detailed site analysis has shown that the parts of Fields 1 and 2 that form this application on the revised Illustrative Masterplan are so well related to the urban fringe that they can be developed without unacceptably impacting on the policy objectives of the Core Strategy. As part of this application the securing of public access to a further three fields to the north of the site will bring

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appreciable gains and will form a permanent upper development line at c 115m AOD that will not be breached.

85 This in no way sets a precedent for any other part of the landscape in the LS1 area or the land referenced in paragraph 4.11 of the Core Strategy, and the conclusions drawn are specific to this site and the development area illustrated.

86 Taking this back to the national level, the NPPF (2021) states, in relation to achieving well-designed spaces, at paragraph 130 that: *Planning policies and decisions should ensure that developments:*

*a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*

*b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*

*c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*

*d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*

*e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*

*f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*

87 The effects of the proposed development have been assessed by the LVA author and through a review and found to be very localised, having a moderate impact on the valued landscape characteristics and minimal impacts on views from within the landscape and of the setting of the city. The proposed siting within the context of retained traditional hedgebanks will allow the development to be relatively smoothly assimilated into the local landscape.

Anne Priscott (CMLI) September 2021