

## LAND AT UPNOR ROAD, UPPER UPNOR

### NOTES ON HOO LANDSCAPE SENSITIVITY AND CAPACITY STUDY

By Jon Etchells, on behalf of Medway Council

#### **1. ORIGIN AND STATUS OF DOCUMENT**

- 1.1 As the date on the cover indicates, the Hoo Landscape Sensitivity and Capacity Study ('the Capacity Study') was produced in draft in February 2019, but was not published until 29 September 2021, and I first became aware of it on 30 September.
- 1.2 The document is intended to assist with the emerging proposals for an enlarged rural town on the Hoo Peninsula, based around Hoo St Werburgh, which is some distance from the Land at Upnor Road Appeal site. However, the Capacity Study includes the Hogmarsh Valley (which in turn includes the Appeal site) as one of its 'land parcels'. I assume this is partly on the basis that the Hoo Peninsula Principal Landscape Area (see paragraph 3.4.8 of my evidence) includes the Hogmarsh Valley landscape character area, and also because (as discussed below) the Capacity Study places value on the Hogmarsh Valley in general and the area around the Appeal site in particular as providing a 'strategic gap' between the main urban areas and the Upnors.
- 1.3 I understand that the Capacity Study has been published as supporting information to the Pre-Submission Draft Local Plan, which will be subject to consultation over the coming months. As such it is still a draft document, but provides some further (and also more recent) information on the Hogmarsh Valley, to supplement that set out in the 2003 Local Plan (in terms of the ALLI designation) and also the 2011 Medway Landscape Character Assessment (MLCA).
- 1.4 I have noted that there is an apparent labelling error in the Capacity Study, in that it refers to (in Table 3, on its page 16) areas which are unable to accommodate development as having a 'high capacity' (coloured red in the table) and areas which can accommodate development as of 'low capacity' (coloured green). It appears to me that, to avoid unnecessary confusion, either the wording of the scale in the left column of the table should be reversed (i.e. high capacity at the top in green and low capacity at the bottom in red), or the word 'capacity' should be substituted with something with the inverse meaning (perhaps resistance, or unsuitability).

- 1.5 I have raised this query with Medway Council's Head of Planning, who is checking if an error has been made. Nevertheless, for the purposes of this note, it is clear (as set out below) that the Capacity Study assesses the Hogmarsh Valley parcel as of medium to high 'landscape capacity', but that that is in fact the second lowest category (out of 5) in terms of suitability for development (see page 71 of the Capacity Study).

## 2. CONTENTS IN RESPECT OF THE HOGMARSH VALLEY

- 2.1 The Hogmarsh Valley forms Land Parcel 1 in the Capacity Study (pages 19 to 24), and its boundaries are broadly the same as those for the Hogmarsh Valley character area in the MLCA. The Capacity Study describes the characteristics of the Hogmarsh Valley, then assesses its landscape and visual sensitivity, before considering its landscape value and determining its overall landscape capacity. Rather than just repeat its content, I have grouped relevant aspects of its coverage below under the headings of the main issues discussed during the landscape evidence.

### ***Characteristics***

- 2.2 These are stated on page 19 of the Capacity Study, and are broadly similar to those in the MLCA, and include the role of the area in forming '*an attractive and distinctive landscape setting and gateway for arrival into the Medway urban areas from the west*', and contributing to the '*important strategic green buffer separating the Medway urban areas from the Upnors*', but also suffering from urban fringe pressures

### ***Rural Character***

- 2.3 I noted in my evidence that there was an apparent contradiction or tension within the MLCA description of the Hogmarsh Valley in that it was described as being within an urban fringe landscape type but was stated to retain a rural character, and I said that in my view both are correct, at various points within the character area, but that the Appeal site and immediate surrounds have a rural character. The Capacity Study does refer to urban fringe pressures in paragraph 1.2 (listed as including the RSME facilities and main roads) and also the sewage treatment works, the car boot sale field, urban edges, Frindsbury quarry and the Medway City Estate (in the 'Landscape features' line in the Landscape Sensitivity table on page 20). However, those features have a limited influence on the Appeal site, and the Capacity Study does also refer to the area retaining its '*rural sense of place*' (in the 'Function of area' line in the Landscape Sensitivity table on page 20), the overall sense of place being '*intact and coherent and predominantly rural*' (in the 'Sense of place' line in the Landscape Sensitivity table on page 20), and states that '*area still retains rural character despite urban pressures*' in the 'Wildness, tranquillity and remoteness' line of the Landscape Value table on page 22.

### **Castle Street**

- 2.4 There is a reference to Castle Street on page 20 (paragraph 1.4) in which it is stated to be '*prominent in long views across the valley*', and is referred to in the context of being a '*settlement edge*'. I agree that the houses on Castle Street are readily visible and in some cases prominent in views from the west and north west (as the proposed development would be), but as discussed in evidence I do not consider them to be part of Upper Upnor or represent the edge of that settlement - they are standalone houses in the countryside.
- 2.5 I would also note that, in the context of the influence of the Castle Street houses on the local landscape, the Capacity Study does not refer to them as being harsh, stark or intrusive, and neither does it list them as being urban, urban fringe or intrusive features in the places where it lists such features (paragraph 1.2, the 'Landscape features' line in the Landscape Sensitivity table on page 20 and the 'Landscape condition' line in the Landscape Value table on page 22).

### **ALLI Functions**

- 2.6 The principal ALLI functions in respect of the Appeal site are the green buffer separating Wainscott and the Upnors (and also other areas), the attractive green (or wooded) backdrop, and the attractive setting for a major gateway. Those are all firmly restated in the Capacity Study, both in the characteristics listed in paragraph 1.2, in the 'Function of area' line in the Landscape Sensitivity table on page 20 (which states '*Provides major benefit as anti-coalescent green buffer between urban areas and the Upnors*') and in the 'Key characteristics and issues' in paragraph 1.6.
- 2.7 I would also note that the 'Visual effects' line in the Visual Sensitivity table on page 21 states that:

*'any development that diminishes the openness and overall coherence of this land parcel would reduce its benefits as a strategic gap that helps to define the local identity of the separate communities at Upnor and Chattenden; its distinctive character would be eroded and there would be adverse impacts on the significant GI opportunities that the area offers.'*

This has a bearing on the discussions in the landscape evidence, in which Mr Chard maintained that an effective gap would remain between Wainscott and Upper Upnor, but my evidence was that (while some open land would clearly remain) the existing gap would be diminished and be less effective.

### ***Landscape Condition, Value, Sensitivity and Capacity***

- 2.8 Landscape condition is stated in the Capacity Study (in the Landscape Value table on page 22) to be moderate - the MLCA assessment was of overall poor condition. The Capacity Study does not explain why the condition assessment was higher, but I would note that some of the intrusive elements within the character area have become better screened and integrated since the MLCA was drafted in 2011, in particular the main roads, the urban edge of Wainscott and the sewage treatment works.
- 2.9 Landscape value is assessed as medium, and the MLCA did not specifically address the matter of landscape value. For the reasons set out in paragraphs 3.5.4 to 3.5.7 of my evidence I believe that the landscape value of the site and surrounds, within the wider Hogmarsh Valley area, should be high.
- 2.10 The Capacity Study assesses Landscape and Visual Sensitivity as both being high (the highest category) - the MLCA considered landscape sensitivity to be moderate, and did not consider visual sensitivity. Again, no rationale for the change from the MLCA is set out in the Capacity Study, but it may reflect increased screening of previously more intrusive features, and an increased awareness of the importance of the area as a green buffer, to which the Capacity Study seems to give slightly increased weight.
- 2.11 The Capacity Study assesses landscape capacity (on page 22) as medium to high, where high is the highest category (and noting again that high capacity as used in the document indicates the lowest suitability for development). This is put into context in the overall summary on page 71 of the Capacity Study, which shows that of the 10 areas considered, only one (Hoo Flats) has a lower suitability for development (i.e. a higher capacity, in the way that the study is worded) than the Hogmarsh Valley, with three areas having the same suitability and five a greater suitability.
- 2.12 The definition for medium to high capacity is stated as:

*'The parcel can accommodate the proposed type of development/ an extension of the proposed type of development only in defined limited situations without significant character change'.*

It may be that the Appellant argues that this indicates some capacity to accommodate development (and the fourth bullet point of paragraph 1.6 on page 23 does refer to '*limited opportunities to introduce development*'), but I would note that:

- This is a standard definition, and not one written specifically for the Hogmarsh Valley.

- The Appeal development is for 72 new dwellings and is not in my view of a 'limited' scale.
- This is for development somewhere within the parcel, and the Capacity Study makes it clear elsewhere that some development could be accommodated either at Manor Farm or the RSME site (in the Visual effects line of the Visual Sensitivity table on page 21).
- One of the development guidelines set out in paragraph 1.7 on page 24 is that: *'It is recommended that this area is protected from any substantial development and that strategies and processes are put in place to strengthen the area's rural character and openness'*.
- The overall recommendation (in paragraph 5.2 of the Capacity Study) is to *'Protect the Hogmarsh Valley from built development'*.

### **Summary Development Guidelines**

2.13 The summary in Section 5 of the Capacity Study (on page 72) sets out a number of development guidelines, of which the following are relevant:

*'Protect and maintain a clear strategic green gap between the urban areas of Medway and the more rural settlements on the Hoo Peninsula, including Chattenden and the Upnors; to retain the more rural character of the Hoo Peninsula and a sustainable enlarged settlement at Hoo St Werburgh.'*

*'As a general principle, new development along ridgelines and upper valley slopes should be avoided; seek to concentrate development along valley floor and lower slopes; taking into account in all cases landscape functions, local characteristics, features and sensitivities.'*

*'Protect the Hogmarsh Valley from built development and retain the area as a valued open space, landscape feature and gateway into the Medway Towns; enhance the biodiversity, recreational and public access value of the distinctive water features along the valley floor and provide improved community public health benefits from these improvements; develop an action plan for enhancement of the Hogmarsh Valley (and Bald Top Hill) working alongside the landowners.'*

2.14 I would note from the above that the Appeal proposals:

- Would not protect or maintain the gap between the main urban area at Wainscott and Upper Upnor.
- Would be located along an upper valley slope.

- Would involve built development within the Hogmarsh Valley, diminishing its value as a landscape feature and gateway. I note that the proposals do include some off site planting and public access provision, but the new (surfaced and lit) footpath connections would themselves lead to some suburbanisation of the valley landscape, and the Capacity Study is in my view seeking those improvements as standalone measures, rather than as mitigation for new development which (as the first part of the third guideline quoted above states) is to be resisted.

### **3. SUMMARY IN RELATION TO APPEAL FOR LAND AT UPNOR ROAD**

3.1 In summary, and bearing the above in mind, my view is that the Capacity Study provides broad support for my evidence in terms of the continuing importance of the ALLI functions of the green buffer and green gateway - that support was restated in 2019 with the drafting of the Capacity Study, and again in 2021 with its publication.

3.2 The Capacity Study also clearly recognises the importance of the Hogmarsh Valley landscape, with two of its concluding development guidelines being:

*'Protect and maintain a clear strategic green gap between the urban areas of Medway and the more rural settlements on the Hoo Peninsula, including Chattenden and the Upnors.'*

*'Protect the Hogmarsh Valley from built development and retain the area as a valued open space, landscape feature and gateway into the Medway Towns'.*

3.3 The Appeal proposals would be in direct conflict with both of those guidelines.

Jon Etchells Consulting, 13.10.21

