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LANDSCAPE ARCHITECTS

Knoll House Hotel, Studland, Dorset

Landscape Statement of Common Ground

LPA: Dorset Council

Appellant: Kingfisher Resorts Ltd

November 2024

Section 78 Appeal

Planning Inspectorate Ref: APP/D1265/W/3348224

LPA Ref: P/FUL/2022/06840

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1. INTRODUCTION

- 1.1 This Statement of Common Ground (SoCG) on landscape and visual matters has been prepared by Richard Sneesby of Richard Sneesby Landscape Architects on behalf of Kingfisher Resorts Ltd (the Appellant) and Joanna Ede of Turley on behalf of Dorset Council (DC) to assist the Inspector in the determination of this appeal. It will identify those matters which are agreed and those key issues which remain in dispute pursuant to Section 13 of the PINS Procedural Guidance (28 May 2024).
- 1.2 The SoCG relates to a planning appeal made under Section 78 of the Town and Country Planning Act 1990 following a refusal of planning permission (ref: P/FUL/2022/06840) made by Dorset Council (DC).
- 1.3 The refusal of planning permission (CD3.45) was in respect of a full planning application submitted by Kingfisher Resorts Ltd for the redevelopment of Knoll House Hotel, Ferry Road, Studland, BH19 3AH. The description of the development, the subject of the appeal is as follows:
- ‘Redevelopment of existing hotel to provide new tourist accommodation including: 30 hotel bedrooms, apartment and villa accommodation and associated leisure and dining facilities’*
- 1.4 The description of development was as per the submitted application forms and formal acknowledgement letter (CD3.48). Whilst changes were made to the proposal to reduce the number of units, it did not affect the description.
- 1.5 The decision notice (CD3.45) contained the following reasons for refusal (RfR) (as far as is relevant to the landscape):

Reason for Refusal 1

The proposal by reason of its scale, form and massing fails to ensure that there would be no detrimental effect upon the environment and natural landscape and fails to be compatible to the special character of the Heritage Coast. This impact has been considered against the substantial local economic benefits. The proposal however is contrary to Policies D, TA, CO and LHH of the Purbeck Local Plan Part 1, the aims and objectives of the NPPF, especially paragraph 177 and 178 and Policies C1 a, c and f, C2 d, e, and f and C4 a, c, d, e, f and g of the Dorset AONB Management Plan 2019 - 2024.

Reason for Refusal 5

(In addition), insufficient details have been submitted to demonstrate that landscaping within the site including proposed earthworks will result in visually attractive, appropriate and effective landscaping of the development. The

proposed development is therefore contrary to Policies LHH and D of the Purbeck Local Plan and paragraphs 135-136 of the NPPF.

- 1.6 The purpose of this SoCG for Landscape and Visual Matters is to identify the areas where the principal parties are in agreement and to narrow down the issues that remain in dispute. This will allow the Inquiry to focus on the most pertinent landscape and visual issues.

2. THE SITE AND CONTEXTUAL FEATURES OF THE LANDSCAPE

- 2.1 This section is taken directly from Section 2 of the Planning SoCG for contextual purposes.

DESCRIPTION OF THE SITE

- 2.2 The site is situated at approximately central Grid Reference SZ 03078 832941. Covering just under 2ha, the hotel Site was constructed in the early 1900s and subsequently became a hotel in 1931. The hotel grounds extend beyond the application red line boundary of the existing developed site. The grounds include a small golf course with tennis courts to the east of Ferry Road, and woodland to the west and north.
- 2.3 The land currently used by the Hotel beyond the red line, as shown on the site location plan (CD1.1) is leased from the National Trust. The provisions of the lease include a statutory right to renew, which is currently being discussed between Kingfisher and the Trust. Kingfisher has, and continues, to manage this area of land.
- 2.4 Vehicular access is currently from Ferry Road, which connects Studland Village with the Shell Bay Ferry Terminal, approximately 2.5miles north of the Site.
- 2.5 Since construction of the original component of Knoll House, the hotel has been the subject of piecemeal extensions. Today, there are approximately 30 buildings scattered across the site. Many are in poor condition. There is also a large amount of gravel and hard standing, which includes provision of parking for approximately 86no. cars.
- 2.6 The buildings are predominately white rendered and prominent from some points in the surrounding area.
- 2.7 The existing hotel comprises 106no. guest bedrooms and 57no. staff accommodation units.
- 2.8 The facilities also include indoor and outdoor swimming pools, restaurant and lounges.
- 2.9 The existing hotel and buildings have a developed footprint amounting to 4,817sqm whilst the total area of gravel and hardstanding measures 8,283sqm, which includes areas of surface car parking and service areas.
- 2.10 Existing buildings include single, two and some three storey structures.

THE PROPOSAL

2.11 The proposal comprises the following:

- Demolition of existing buildings on the site excluding some limited parts of the central façade of the original hotel building;
- new hotel building with 30 bedrooms and a restaurant;
- 18no. apartments;
- 26no. villas;
- New leisure facilities including a new spa and swimming pool;
- Landscaping;
- Green roofs to enhance biodiversity and carbon sequestration;
- A community heating system;
- 75 car parking spaces;
- 36 cycle spaces; and
- Retention of existing access from Ferry Road;

2.12 Please refer to the Existing Site Block Plan (CD1.2) and the Proposed Site Block Plan (CD1.16).

2.13 The total GIA of the proposals is 15,013sq m. Excluding the floorspace of the proposed car parking areas, the total Gross Internal Area (GIA) of the proposal is 12,797 sqm.

2.14 The GIA of the proposals at basement level is 3,828 sqm, with 11,185 sqm at ground floor and above.

2.15 The existing hotel GIA is 6,050sqm.

2.16 Excluding the floorspace of proposed car parking areas, the GIA of the First Application was 14,385sqm.

3. MATTERS OF FACT

DESIGNATIONS

- 3.1 The site and the whole of the southern part of Purbeck is within a designated National Landscape ‘Dorset Area of Outstanding Natural Beauty’ (AONB).
- 3.2 The Dorset AONB unit considers the following Special Qualities to be particularly susceptible to potential harm from the proposal:
- Uninterrupted panoramic views to appreciate the complex pattern and textures of the surrounding landscapes
 - Tranquility and remoteness
 - Dark night skies
 - Undeveloped rural character
 - An exceptional undeveloped coastline
 - Wildlife of national and international significance
- 3.3 The site is located in close proximity to the Purbeck Heaths National Nature Reserve (NNR), Dorset Heathlands Special Protection Area (SPA), Ramsar Site (also designated as Studland & Godlingston Heaths Site of Special Scientific Interest (SSSI)), Dorset Heaths (Purbeck and Wareham) and Studland Dunes Special Area of Conservation (SAC) and Poole Harbour SPA, Ramsar and SSSI.
- 3.4 The site lies within the Purbeck Heritage Coast which is an area of international importance. The area holds the European Diploma of Protected Areas (EDPA) which is an award granted by the Council of Europe which recognises *‘natural and semi-natural areas and landscapes of exceptional European importance for the preservation of biological, geological and landscape diversity which are managed in an exemplary way’*¹.
- 3.5 An oak tree on the site is subject to a Tree Protection Order (TPO), in addition the pine trees located along the roadside frontage are subject to a group TPO. Two further Tree Preservation Orders adjoin the Site and the tree crowns and root protection areas of these extend into the site.

DEVELOPMENT PLAN

- 3.6 The site is located within the administrative boundaries of Dorset Council (DC), in the former Purbeck District.
- 3.7 The adopted Development Plan comprises the Purbeck Local Plan 2018-2034 (CD4.3). The plan was formally adopted on 18th July 2024 following the

¹ <https://www.europarc.org/european-policy/council-of-europe/the-european-diploma-for-protected-areas/>

submission of this appeal. This replaces the Purbeck Local Plan Part 1 (adopted 13 November 2012) referenced in the Reasons for Refusal. Full weight should be placed on the policies in the adopted Purbeck Local Plan 2018-2034.

3.7 The relevant policies referenced at RfR1 and RfR5 of the Decision Notice referring to the Purbeck Local Plan Part 1 (adopted 13 November 2012) have been superseded as follows:

- Policy D ‘Design’ superseded by Policy E12 ‘Design’;
- Policy TA ‘Tourist Accommodation and Attractions’ superseded by Policy EE4 ‘Supporting Vibrant and Attractive Tourism’;
- Policy CO ‘Countryside’ superseded by Partly Replaced by Policy I7 ‘Community Facilities and Services’ and Policy H8 ‘Small Sites next to Existing Settlements’;
- Policy LHH ‘Landscape, Historic Environment and Heritage’ superseded by Policy E1 ‘Landscape’ and Policy E2 ‘Historic Environment’.

DESCRIBED LANDSCAPE CHARACTERISTICS

3.8 The site is situated at approximately central Grid Reference SZ 03078 832941. The Site lies adjacent to Ferry Road and approximately 400m north of the settlement of Studland.

LANDSCAPE CHARACTER BASELINE

National Character Areas

3.9 The site lies within the Dorset Heaths National Character Area (NCA 135) (Figure 1221/01). Key characteristics of the Dorset Heaths NCA include:

- *‘The landscape is predominantly of low relief. In places erosion has left incised but shallow valleys, now dry or holding small watercourses, sometimes with associated mires.*
- *‘There are large tracts of gently undulating, less-fertile marginal land dominated by conifer plantations or by heathlands of international importance (Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar site) for populations of nightjar, woodlark, Dartford warbler, sand lizard, smooth snake and Dorset heath, as well as a rich assemblage of heathland and mire invertebrates and lower plants.*

- *‘Soils are predominantly sandy, susceptible to erosion and relatively unproductive. Agriculture is generally pasture, with fields bounded by hedgerows or fences. There is some arable cropping, especially maize.’*
- *‘Settlement is mostly sparse, with historic settlements generally associated with the rivers or harbourside...’*
- *‘The heathlands can provide a real sense of remoteness combined with bleakness or tranquillity, depending on the weather.’*

Dorset AONB Landscape Types and Landscape Character Areas

3.10 The site is located within the Lowland Heathland Landscape Character Type (LCT) and the South Purbeck Heaths Landscape Character Area (LCA), as described in the Dorset National Landscape, Landscape Character Assessment (2019) Key landscape characteristics, strength of character, landscape condition, landscape change and landscape guidelines for this host LCA are noted in the following sections. Dorset LCTs are shown on Figure 1221/05b in Appendix 6.3.

Key characteristics and Special Qualities of the South Purbeck Heaths LCA are identified as:

- *Wildlife of national and international significance*
- *Wide open views of colourful and textured heathlands, with tranquil and remote character derived through perceived naturalness and an absence of development*
- *‘Undulating and exposed heathland landscape with dense heather carpets, valley mires, gorse and isolated Scots pine*
- *‘Occasional small birch and oak woodlands*
- *‘Patches of rough acidic grassland and small rough enclosed pastures*
- *‘Mosaics of patchy heathland and scrub with woody thickets*
- *‘Reed beds and marshes grading towards exceptional undeveloped coastline Poole Harbour*
- *‘Straight roads flanked by broadleaved woodlands and surrounding open heathlands*
- *‘Occasional isolated linear settlements.’*

3.11 Description of the South Purbeck Heaths LCA is as follows:

This is a very diverse and dynamic landscape ranging from large remaining tracts of open heathland to dense conifer plantations with a variety of industrial and military land uses. Its outstanding wildlife interest and wide variety of heathland habitats, including wet valley mires and bogs, are of great landscape interest. Towards Studland, a dramatic relief offers spectacular views of the surrounding wild heathlands and coast. The area becomes more pastoral towards the Corfe

farmlands and Studland village with its wooded character dominating the eastern fringe of the heath. Around the fringes towards the west and south the landscape becomes more pastoral in character whereas larger conifer plantations occur towards Poole Harbour and the Lulworth Ranges and Estate. Hartland Moor forms a superb heathland and mire landscape with extensive views of colour and texture. Arne Peninsula is complex structure of pastoral woodlands with veteran oaks opening out to a mosaic of heathland and scrub with mires, grasslands, reed beds and salt marshes grading towards Poole Harbour. Where field boundaries exist, they are largely made up of trimmed hedgerows and trees.

Land shape and structure

The area has a distinctive and dramatic relief with small ridges rising to 100m, rolling hills, undulating lowlands with upstanding geological features of dark ironstone and valley bottoms. The underlying rock is soft and of sedimentary origin.

Soils and vegetation

The soil is light, shallow, free draining and sandy. These impoverished conditions support a wide range of heathland habitats with heather, gorse, bracken, dry acidic grassland, stands of birch, oak and pine, reed beds and wet valley mires. The quality of these habitats is indicated by the wealth of national and internationally important nature conservation designations. The largest area of heathland survives within the army ranges near Lulworth.

Settlement and land cover

Purbeck Heaths displays a complex mix of land cover. Due to many of the heathlands being protected, much of the area is free of settlement except a few scattered farmsteads. Towards Studland, landcover becomes more pastoral with small broadleaved woodlands. Planned farms and ordered lanes lie within a relatively well-wooded landscape characterised by recent secondary and medium sized woodlands and tree belts. There is seasonal grazing of rough pasture on marginal uncultivated land along with some arable farming. Former mineral workings provide a range of interesting wetland habitats, with Blue Pool one of the best known.

Historic character

The prevailing heathland character is the result of soil exhaustion through intensive farming, primarily in the Bronze Age. Along with the survival of open heathlands, the area is also dominated by recent large conifer plantations. Some piecemeal enclosures with mixed woodlands are found towards the west. A number of Bronze Age barrows survive here, particularly in the eastern part, but

the most notable monument is probably Rempstone stone circle. A number of late Iron Age and Romano-British pottery manufacturing sites are recorded in the vicinity of Stoborough, part of a massive industry centred on Poole Harbour. Particularly notable modern monuments are the World War pumping station in Studland village, with pipes leading to the sea and Fort Henry from which Churchill viewed D-day preparations.

Visual character and perceptions

The area has a diverse visual character appearance ranging from wild open heathlands to enclosed wooded areas. In the eastern and western extents, there is a lack of tree cover alongside gently rolling relief, providing impressive views, such as of the remote and colourful heathlands towards the tranquil fringes of Poole Harbour. The central area is wooded with a more intimate and enclosed feel.

3.12 The current strength of character is described as follows:

*The overall landscape is judged to have a **moderate** character. Although the area is affected by a wide range of land uses and pressures, heathland habitats are largely unsettled with consistent patterns of heathland features and have benefitted from recent enhancement through initiatives such as the Nature Improvement Area (NIA). Such measures have improved the management of existing heathlands and have removed a number of conifer plantations that had weakened the area's natural character. Although a number of plantations remain, some serve to screen some industrial and residential development. Agriculture and mineral workings have become part of the landscape and often provide well managed features.*

3.13 The current landscape condition is described as follows:

*There has been a significant reduction in the extent of plantations in recent years, with heathland restoration projects benefitting heaths at Arne, Holme, Slepe, Rempstone and Newton. Additionally, changes in the management of remaining plantations are considered to have improved their visual characteristics and biodiversity. Heathland habitats are largely in good condition with continued ecological management in place. Heathland mosaics are under constant pressures from encroachment of woodland and scrub. Furthermore, the heaths are often subject to pressures from their recreational use, including disturbance, fly tipping and fires. As significant recent enhancements have partly addressed a decline in traditional heathland character, overall landscape condition is judged to be **moderate and improving**.*

3.14 Planning guidelines for the South Purbeck Heaths LCA include:

- *Protect important conifer plantations that screen intrusive development with phased replacement to broadleaved woodlands. Ensure that commercial forestry plantation is located away from designated heathland and balanced with native deciduous planting, thereby enhancing natural character and delivering biodiversity gains.*
- *Secure appropriate mitigation measures and landscape enhancements resulting from further oil and gas extraction. Resist new proposals that result in significant harm to the character and appearance of the National Landscape and/or its setting.*
- *Protect heathlands from excessive visitor pressure and associated infrastructure.*
- *Limit the impact of camping and caravanning sites. Restrict the expansion and creation of sites in areas where impacts are already significant, including areas subject to notable cumulative effects. Control proposals to introduce new 'glamping' facilities, based on landscape and visual sensitivities. Pursue appropriate mitigation measures, including seasonal limitations, landscape enhancement measures and conditions that control noise and light pollution.*
- *Encourage the use of native planting in any landscape scheme associated with new development and consider removal of unsympathetic species, such as the Leylandii screening hedges that stand out in the landscape.*
- *Conserve the open character of rural lanes. Remove excessive signage and seek alternatives to infrastructure associated with urban development and out of scale traffic management schemes.*
- *Ensure mineral workings are mitigated as far as possible with clear aims for long term restoration.*
- *Promote undergrounding of small-scale powerlines in open, sensitive locations*
- *Ensure that coastal and flood defences are compatible with the National Landscape's exceptional undeveloped coastline. Require the use of materials that are complementary to the character and appearance of their environs.*
- *Ensure that development linked to aquaculture and fishing is compatible with the National Landscape's exceptional undeveloped coastline. Avoid locating permanent infrastructure in sensitive areas and minimise the impact of essential infrastructure through good design.*

- *Avoid unnecessary and prolonged noise and light pollution. Require good design to limit the impacts and use appropriate planning conditions to secure ongoing control.*

3.15 Management guidelines for the South Purbeck Heaths LCA include:

- *Pursue the removal of and improved management of conifer plantations. Avoid clear felling except for heathland restoration and otherwise encourage continuous cover and phased transition to broadleaf species. Soften edges of retained woodland blocks to follow landform.*
- *Restore heathland habitats to improve extent and connectivity.*
- *Protect acid grasslands from further scrub encroachment.*
- *Restore mires back to functional ecosystems.*
- *Maintain the balance and monitor heathland mosaics from scrub encroachment, bracken and woodland succession, particularly where these buffer existing heathlands through promoting grazing regimes. Encourage woodland thinning within and around the wooded heath habitats.*
- *Conserve and enhance extensive grazing regimes.*
- *Enhance the function of habitats in supporting the wider ecological network, where appropriate.*
- *Protect stands of mature broadleaved woodland along roadsides and create glimpses of open heathlands through scrub clearance.*
- *Soften edges of existing woodland blocks to follow landform and protection of important views.*
- *Manage the impact of rising sea levels through creation of flood marsh around Arne Moors.*

3.16 The Rempstone Wooded Pasture LCA lies approximately 0.7km to the south of the site. A key characteristic and special quality of this area of relevance to the Proposal is:

- *Some fine panoramic views, particularly in the eastern portion where there are opportunities to look across the heaths and toward Poole Harbour*

3.17 Landscape guidelines for this LCA that are relevant to the Proposal include:

- *‘Protect important views of the surrounding open heathlands and views towards the Purbeck Ridge.’*

3.18 The Purbeck Ridge LCA lies approximately 1.2km to the south of the site. Landscape guidelines for this LCA that are relevant to the Proposal include:

- *‘Protect and enhance important views to and from the ridge/escarpment.’*

Dorset Coast Seascape Character Types

3.21 The coastal environment in the wider area to the east, north-east and south-east of the site includes a number of seascape character types (SCTs) and LCTs, as described in Dorset Coast, Landscape & Seascape Character Assessment (LDA Design, 2010).

3.22 The Sandy Beach SCT extends around the coastline to the east and north-east of the site at an approximate minimum distance of 0.4km from the site. Key characteristics of this SCT that are relevant to the Proposal include:

- *‘Predominantly sandy beaches generally not associated with extensive sand dune systems, except at Studland.’*
- *‘Important recreational beaches for passive recreation, swimming and watersports.’*

3.23 The Hard Rock Cliffs SCT extends around the coastline to the south-east of the site at an approximate minimum distance of 1.4km from the site. Key characteristics of this SCT that are relevant to the Proposal include:

- *‘Hard cliffs generally of sandstone, chalk and limestone with vertical or near vertical faces and ledges, often dramatic, with pinnacles and pillars;*
- *‘Often highly visible from long distances due to height and colour;*
- *‘Cliff tops provide significant panoramic views especially when associated with high points.’*

3.24 The Active Coastal Waters SCT extends around the coastline to the east and south-east of the site. Key characteristics of this SCT that are relevant to the Proposal include:

- *‘High level of activity, often seasonal, from recreational sailing and other watersports;*
- *‘Strong visual relationship with the coastline and urban areas;*
- *‘Often associated with important recreational beaches close to main centres of population.’*

3.25 The Natural Harbour LCT extends around the coastline found beyond the Purbeck Heaths LCA to the north of the site. Key characteristics of this LCT that are relevant to the Proposal include:

- *'A large scale, open, tranquil and generally unspoilt landscape;*
- *Provides unique setting for the towns of Poole and Christchurch;*
- *Important vistas and views of historic and cultural importance;*
- *Unique and sensitive interrelationship with urban edges and the natural environment;*
- *Provides important and popular open space and recreational value.'*

4. AGREED LANDSCAPE MATTERS

4.1 The following matters are agreed between the Council and the Appellant.

METHODOLOGY

4.2 The criteria used in the LVIA for defining sensitivity of receptors and assessing magnitude of effect and significance of effect are not disputed. These are included in the ES LVIA Chapter 6 (CD 1.59) within Sections 6.38 – 6.45

4.3 The Dorset AONB Unit agreed that the mapping and baseline assessments produced by Landscape Visual Ltd for an earlier 2018 planning application (ref: 6/2018/0566) remain current and relevant and could be used within the current application. Where new policies have been adopted since the 2018 application, these supersede the earlier assessments and are included and assessed in their current form.

SELECTION OF REPRESENTATIVE VIEWPOINTS

4.4 The selection of representative viewpoints was discussed with Dorset's AONB Landscape Planning Officer Richard Brown CMLI in 2022. This included the use of viewpoint photographs from an earlier LVIA produced in 2018 by Landscape Visual Ltd which are winter views, and additional views taken in September 2022 where it was considered that some views had been missed or could be supplemented with further photographs to provide a complete coverage of visual representation from the surrounding landscape.

LANDSCAPE EFFECTS GENERALLY

4.5 It is agreed that the LVIA has considered predicted effects upon landscape character and visual receptors within the study area. The area is designated and popular with visitors pre-occupied with enjoyment of the scenery. Nearly all receptor sensitivity values are High.

4.6 For landscape character this means assessment of the predicted effects upon the described landscape character, landscape designations, landscape features and, in particular, the special qualities and the reasons for designation of the Dorset AONB.

4.7 It is agreed that the proposal involves changing one existing complex of buildings for another.

AGREED LANDSCAPE CHARACTER MATTERS

- 4.8 It is agreed that the effect of the proposal upon the landscape character of an area designated as a National Landscape and Heritage Coast forms a key focus for the Inspector.
- 4.9 It is agreed that the existing baseline condition of parts of the Hotel and grounds to the west of Ferry Road are in poor condition due to incremental and unplanned random additions to the hotel buildings and its associated infrastructure in the second half of the 20th century. The Appellant's assessment of the effect of the baseline development without the works is described in LVIA Sections 6.104 – 6.109.
- 4.10 Notwithstanding the above, it is agreed that the hotel landscape will change as a result of the development including felling trees and the re-design of the landscape space including parking provision. This will alter the site landscape characteristics and biodiversity and be visible from some viewpoints. It is agreed that these considerations should form part of the assessment of effects upon landscape character and views.

AGREED VISUAL MATTERS

Selection of representative viewpoints and photomontage studies

- 4.11 It is agreed that the 13 representative viewpoints in the LVIA cover the key views towards the site from the surrounding area (other than the sea).
- 4.12 It is agreed that a combination of winter and summer views discussed with the council illustrate the seasonal changes to the views.
- 4.13 It is agreed that the sensitivity of visual receptors are not in dispute and that matters of dispute are restricted to assessment of magnitude, significance and type of effect (i.e. beneficial or adverse).
- 4.14 It is agreed that the visualisations for views 4, 5b, 6, 7b, 7c, 8, 9, 10 and 11 within the LVIA and Addendums, including photomontage studies, show a small part of wider panoramic views from higher ground to the south. It is further agreed that to fully understand the visual context, these images must be reviewed within the wider panoramic context which is experienced by the receptor at these viewpoints.
- 4.15 It is agreed that the hotel cannot be clearly seen from Viewpoint 11.

5. MATTERS IN DISPUTE

LANDSCAPE

- 5.1 Whether the proposal constitutes 'major development' for the purposes of considering the proposal within the National Landscape (AONB) in the context of NPPF Paragraph 182 and 183.
- 5.2 Whether the proposal, by virtue of its scale, form and mass, would have an acceptable or unacceptable impact on the National Landscape and Purbeck Heritage Coast.
- 5.3 The accuracy and completeness of scheme information and visualisations submitted with the application are disputed and whether this is sufficient to fully understand the landscape and visual effects of the proposals.
- 5.4 The type of landscape and visual effects arising from the proposal (i.e whether beneficial or adverse) are disputed.
- 5.5 The effectiveness of the submitted landscape strategy in mitigating landscape and visual effects of the proposals is disputed. Whether the proposals constitute high quality design is disputed.
- 5.6 Whether the proposal conserves and enhances the landscape and scenic beauty of the National Landscape is disputed.
- 5.7 Whether the proposal positively integrates with its surroundings for the purposes of Local Plan Policy E12
- 5.8 Whether the proposed development complies with national and local policy relating to landscape and design.

Signed on behalf of the Appellant	Signed on behalf of the Council
Richard Sneesby Richard Sneesby Landscape Architects	Joanna Ede Turley
	