

Lankshear, Robert

From: Lankshear, Robert
Sent: 10 December 2020 11:30
To: 'Emma Harding'
Cc: Robinson, Ian; Barrie Davies
Subject: 2020/01170/OUT - Coastal Buffer and Visual impact

Dear Emma,

Wales Coastal Path

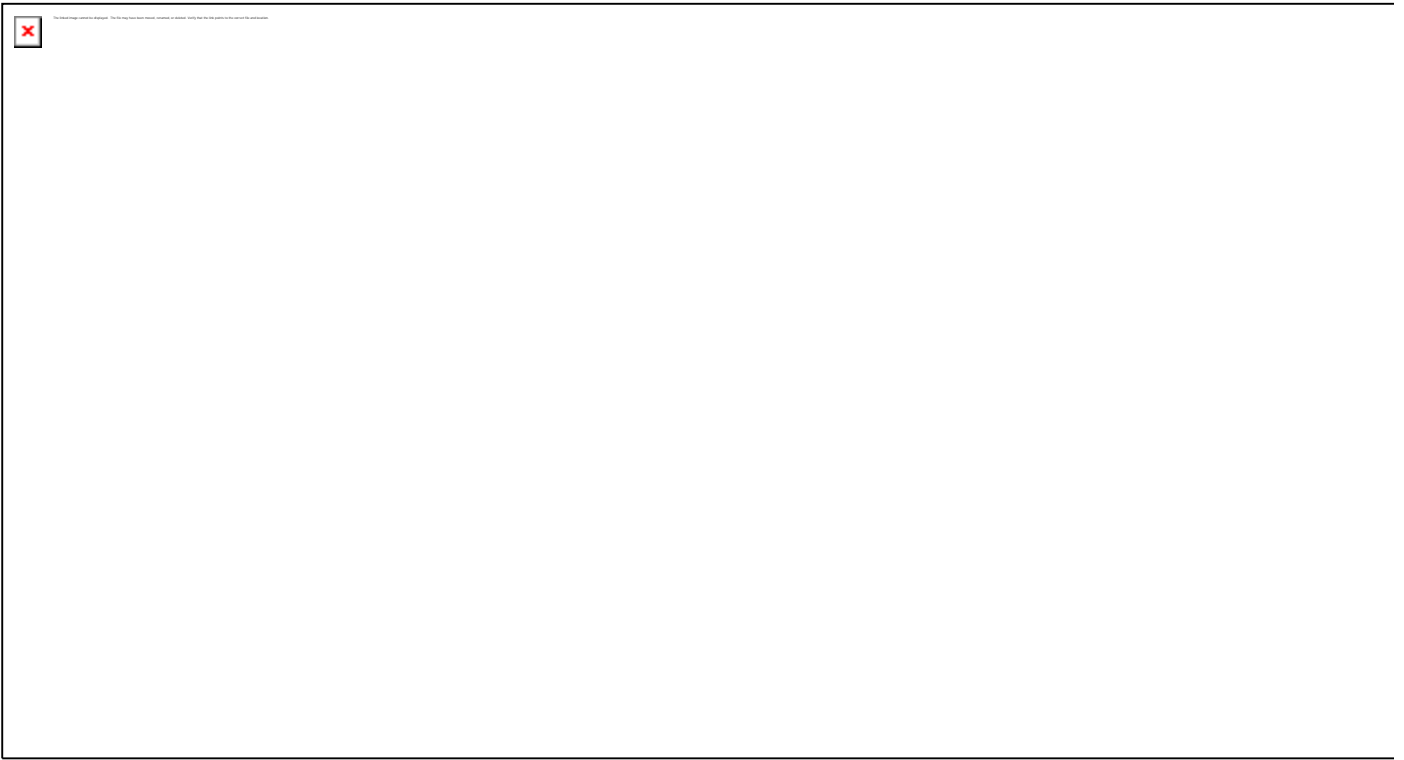
As discussed on Tuesday, further to my meeting with landscape, Public Rights of Way and park maintenance, I write to provide some further guidance with regard to the diversion of the footpath and form of any POS area to accommodate this to the east of the site. I appreciate the application is in outline but as noted in Gwyn's email a buffer of approximately 20 metres would be sufficient to accommodate the PROW that he indicated will need to be diverted into the site within the next 12-18 months. Other comments included the provision of occasional elevated viewing points across the coast for users of the path utilising the heightened topography of the site itself and with wider areas to provide focus. Whilst there is no fixed margin from proposed properties it was suggested that the path should not, as per previous communication, run along or utilise pavements/estate roads. It was suggested that the surface should be tarmacked and if possible be of sufficient width to also accommodate cyclists. From an ecological perspective, our ecologist would prefer any such area not to be overly manicured with scope for planting/trees with limited intervention into the existing scrub/cliff top area adjacent to the existing coastal path.

Visual impact

Further to our conversation on Tuesday, I have been looking again at the scale parameters proposed for the buildings across the site. At our meeting we discussed concern with regard to how representative the LVIA is of the likely visual impact but particularly focussed upon the 4-7 storey elements. I just wanted to add some further commentary with regard to the overall visual impact of the wider development.

Firstly, I note the maximum heights given for some of the buildings appear to exceed typical storey heights as suggested, including those usually expected for 2-3 storey development that constitutes the majority of that proposed. For instance 14 metres for 3 storey development seems excessive, and similarly 10 metres for 2 – 2 ½ storeys seems high. I appreciate these are maximum parameters and that scale of individual buildings will be further considered at reserved matters stage, however, I have concern with regard to approving excessive height parameters on a site at a rural-urban interface.

Furthermore having considered the topographic survey with the position of maximum storey heights, I think this raises further concern with regard to the accuracy of the modelling contained within the LVIA as discussed at our meeting. Photomontage 12 shows the scale of development when viewed from the public right of way running to the west of the site. The topographic survey shows the ridge height of the building (circled in red) as 38.5 metres AOD. The development towards the southern end of the site is shown as being a maximum of 14 metres on the height parameter plan yet the LVIA photomontage 12 indicates that development at this part of the site as being of a broadly commensurate height (circled green), although in theory this could have a ridge height of between 48-50m AOD, noting ground levels at this part of the site are shown as being 34-36 metres AOD. As discussed, the topo/maximum height would also result in 7 storey block being up to approximately 59 metres AOD which I also do not believe is shown accurately.



I acknowledge that the site has been allocated for development that will have a degree of visual impact, the heights noted on these plans are maximum heights and that its height may exceed that of the neighbouring development owing in part to levels differences across the site. However, noting the above, our discussion at the meeting with regard to the taller elements of the proposal and comments from our landscape architect Gareth Phillips (including the impact of development viewed from the Wales Coastal Path photomontage 16), I have concern that the LVIA is not truly representative of the potential visual impact of the proposal (including from photomontage 12 and 16). These concerns particularly relate to the impact of development on the higher, easternmost plateau. Furthermore, although ridge heights of neighbouring buildings to the north have been provided it would be beneficial if you could provide topographical detail of surrounding land to allow this matter to be better considered. For the above reasons, consideration should be given to the reduction of maximum height parameters, the location and impact of taller development and whether the LVIA accurately models the visual impact of the proposal. Your comments and consideration of these matters are welcomed.

Consultation Responses

Further to our discussion please see attached consultation response received from our Shared Regulatory Services (Pollution Control) section for your information.

Kind regards

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