

HAMPSHIRE COUNTY COUNCIL**Decision Report**

Decision Maker:	Regulatory Committee
Date:	12 September 2012
Title:	Storage of empty skips and containers, with screening bund at 1 Hollybush Lane, Aldershot, Hampshire GU11 2PX (Application No: 12/00513/HCC) (Site Ref: RM031)
Reference:	4270
Report From:	Head of County Planning

Contact name: Julia Davey

Tel: 01962 846732

Email: julia.davey@hants.gov.uk

1. Executive Summary

- 1.1. Planning permission is sought retrospectively for the storage of empty skips and containers, with screening bund adjoining Unit 1A, Hollybush Lane, Aldershot, Hampshire GU11 2PX.
- 1.2. The site extends across 0.13 hectares of land designated as countryside in the Rushmoor Core Strategy 2011. The site is outside of the Aldershot Stubbs Industrial Estate boundary as allocated for bad neighbour uses in the Rushmoor Core Strategy (2011). It is adjacent to Unit 1A, the first unit on the very southern perimeter of the industrial estate. The site lies adjacent to the River Backwater and within the flood zone 2. All of the Aldershot Stubbs Industrial Estate sits on land that was tipped with inert waste many decades ago. Historic records show this tipping as extending to the eastern and western banks of the River Blackwater and to the south, north and west as well as east of the industrial estate.
- 1.3. The applicant states it needs this land to support the adjacent recycling permission that has recently been implemented.
- 1.4. Objections have been received from Ash Parish Council, Rushmoor Borough Council and the Blackwater Valley Countryside Partnership. Despite understanding that the applicant considers the existing operation needs more space and so there are some economic merits to the application, these are considered insufficient to justify departing from the

development plan in that it is a development:

- (i) proposed on a site in the countryside contrary to Policy DC13 of the Hampshire Minerals and Waste Core Strategy (2007) and CP14 of the Rushmoor Core Strategy (2011); and
- (ii) the development would have a detrimental effect on the landscape character and amenity of the area and set an undesirable planning precedent for further extensions of Aldershot Stubbs Industrial Estate into adjoining countryside that would be contrary to Policy DC3 and DC8 of the Hampshire Minerals and Waste Core Strategy DPD (2007) and Policy SS1, CP1 and CP14 of the Rushmoor Core Strategy (2011).

2. The Site

- 2.1. The site extends across 0.13 hectares of flat low lying land that adjoins to the north an existing recently permitted recycling facility at Unit 1A Hollybush Lane (which is within the Aldershot Stubbs Industrial Estate allocated for bad neighbour uses in the Rushmoor Core Strategy 2011). Unit 1A is the first industrial unit when accessing the industrial estate from the south via Government Road or Lakeside Road. The site is designated as countryside in the Rushmoor Core Strategy 2011. To the east the site is bordered by the River Blackwater beyond which lies the Blackwater Valley long distance footpath. To the south east approximately 180 metres away are the nearest residential properties in Ash, Surrey. The River Blackwater forms the boundary between Hampshire and Surrey.
- 2.2. The site is at a slightly lower level than Hollybush Lane level with the top of the bank edge of the River Blackwater and is within flood zone 2. To the west is some vegetation separating the site from Hollybush Lane and to the south the site is screened during summer months by self seed ash, alder and willow.
- 2.3. The site is now open to the east towards Surrey and the Blackwater Valley long distance footpath. The site is fenced with steel palisade fencing to the west and south and accessed through a gate connecting it to Unit 1A.
- 2.4. Historic records indicate that the site was tipped many decades ago with inert waste along with the entire area of the Aldershot Stubbs Industrial Estate and land to the west, north and east of the industrial estate as well as some land on the opposite side of the site to the east of the River Blackwater.

- 2.5. More recent County Council planning history is listed below where it can be seen that planning permission was initially granted for a waste recycling facility in 2007 which was varied by the applicant in 2011 (11/00380/HCC).

Application No.	Location	Proposal
11/00380/HCC Granted 10.8.11	1A Hollybush Lane, Aldershot Hampshire GU11 2PX	Variation of conditions 15 (Site Layout), 21 (Storage of Material), 26 (waste transfer building construction), 28 (retaining timber wall), 29 (interior of Waste Transfer Building) and 30 (Portacabin Offices) of Planning Permission 07/00807/HCC
07/00807/HCC Granted 25.3.09	1A Hollybush Industrial Park, Hollybush Lane, Aldershot, Hants GU11 2PX	Waste recycling and waste transfer facility
06/00198/HCC	1A Hollybush Industrial Estate, Hollybush Lane, Aldershot	Waste Transfer Station with soil screening plant to recycle materials

3. The Proposal

- 3.1. Planning permission is sought for the storage of empty skips and containers, with screening bund at 1 Hollybush Lane, Aldershot, Hampshire GU11 2PX (Application No: 12/00513/HCC) (Site Ref: RM031).
- 3.2. The development is retrospective. The applicant states the extra storage area is needed to enable the efficient operation of the site as there is not enough room within the site to suit current operational needs.
- 3.3. The applicant states the land was tipped in/around the 1970s and that geological investigations have proven this. The applicant adds that ground investigations revealed some heavy metals exist but conclude there is no harm caused to the river and there will be no penetration of the land. The applicant has also submitted a flood risk assessment and a visual impact assessment with the application. The applicant is proposing planting on peripheral areas where there is no tipped material or the land is predominantly soils. The site is fenced on three sides.
- 3.4. The flood risk assessment concludes that:
- (i) there are no infrastructure changes proposed as a result of the development;

- (ii) the site comprises of made ground;
 - (iii) the likelihood of the site causing off-site flooding is considered to be negligible; and
 - (iv) the likelihood of the site being impacted by flooding from the River Blackwater is low.
- 3.5. The visual impact assessment states that ‘the photographs also show that there is substantial vegetation between the site and the public footpath that runs along the Blackwater Valley. The development is not generally apparent to users of the footpath and there is no marked effect on the visual amenity or landscape character from this viewpoint. In the overall context of the site, there are no significant long distance views of the proposed development. The proposal does not change in any significant way the character or appearance of the site or the surrounding landscape.’
- 3.6. The land site investigation confirmed that the application site comprises of infill material. With reference to historical maps, the infilling occurred during the 1970s. The nature of the material is consistent with construction and demolition waste, including bricks, rubble, soil, concrete and occasional items of plastic packaging and packaging ties. The soil testing did identify the presence of heavy metals, PAHs and TPHS, although at concentrations which are not considered to be significant. The proposed end use is not a sensitive receptor to the ground conditions. The land will be use for storing empty skips and containers and the ground will remain as existing. It also advised that some parts were better for planting than others.
- 3.7. The proposal is not an EIA Development under the Environmental Impact Assessment Regulations 2011 and an environmental statement has not been submitted.

4. Development plan

- 4.1. **Hampshire Minerals and Waste Core Strategy (HMWCS)** – Policies DC3 (Impact on Landscape); DC5 (Green Belt); DC8 (Pollution, Health, Quality of Life and Amenity); DC13 (Waste Management and Recycling); Hampshire Minerals and Waste Core Strategy - Policies DC1 (Sustainable Development); DC3 (Visual Impact); DC6 (Highways); DC7 (Biodiversity); DC8 (Pollution, Amenity); DC11 (Flooding); and DC13 (Waste Management and Recycling) apply.
- 4.2. **HMWCS** – Paragraph 26.42 - Previously developed land includes land, which is derelict and has had a previous military, industrial or commercial use. It however does not include mineral or landfill sites which are restored or are due to be restored.

- 4.3. **Rushmoor Core Strategy (RCS) October 2011** – Policy SS1 - The Spatial Strategy; Policy CP1 - Sustainable Development Principles; CP14 (Countryside).
- 4.4. **RCS (2011) - What will Happen and Where - The Spatial Strategy - Aldershot Farnborough** - Hollybush Lane (bad neighbour uses).
- 4.5. **RCS (2011)** - Paragraph 8.150 - Land located outside the built up areas in Rushmoor is defined as countryside. Countryside policies apply to these areas and the Spatial Strategy (Policy SS1) strictly controls new development here.
- 4.6. **RCS (2011)** - Paragraph 8.151 - The Blackwater Valley area of countryside, which lies on the eastern boundary of the Borough, is of particular importance for informal recreation, local nature conservation and as part of the Borough's Green Infrastructure. The South East Plan recognised its sub-regional role and identified the need to improve the quality of the Blackwater Valley's natural environment and provide green infrastructure networks. The Council works jointly with other relevant local authorities in the Blackwater Valley to enhance and maintain wildlife and landscape protection and to manage sensitive recreational use of the Valley. Much of this work is co-ordinated through the Blackwater Valley Countryside Partnership.
- 4.7. **RCS (2011)** – Paragraph 8.152 - The Council wishes to maintain and enhance the Blackwater Valley area of countryside, which is narrow, sensitive to development and vulnerable in places. It is therefore important to prevent the settlements visually merging, causing coalescence.
- 4.8. **National Planning Policy Framework (NPPF)** - The NPPF although not part of the development plan is a 'material' consideration. It was published by the Government in March and largely replaces former planning policy statements – except for PPS10 (see below). It includes an overarching 'presumption in favour of sustainable development' which means 'approving development proposals that accord with the development plan without delay'. The presumption allows for only refusing permission where adverse impacts clearly outweigh the benefits, or NPPF policies indicate developments should be restricted.
- 4.9. **NPPF glossary – 'Previously Developed Land** - Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-

developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.'

- 4.10. **Planning for Sustainable Waste Management (PPS10)** - PPS10 remains as national policy until a new National Waste Management Plan is adopted and provides for:
- (i) delivering sustainable development by driving waste management up the waste hierarchy, addressing waste as a resource and looking to disposal as the last option; and
 - (ii) protect green belt but recognise the particular locational needs of some types of waste management facilitieswith the wider environmental and economic benefits of sustainable waste management needs...that should be given significant weight ...in decision making.

5. Consultations

- 5.1. **Councillor Kimber** states that if permission is granted the height of skips needs to be strictly controlled.
- 5.2. **Rushmoor Borough Council** objects to the application on the grounds that the unauthorised skip storage use of the land is an unacceptable expansion of commercial land use into the countryside to the detriment of the character and landscape of the area contrary to Rushmoor Core Strategy Policy CP14.
- 5.3. **Ash Parish Council** objects to the application for the following reasons:
- (i) this land is not part of the industrial estate;
 - (ii) this proposal would move the industrial estate closer to residential accommodation;
 - (iii) this land is countryside beyond the greenbelt;
 - (iv) this land is covered by the Guildford Borough Council Blackwater Valley Recreation Policy R11; and
 - (v) if permission is granted, there should be a condition that no more than 40 skips and containers can be stored and the height should not exceed four skips.
- 5.4. **The Environment Agency** states that the existing screening bund is to be retained, however the spoil heap adjacent to the river will be removed. The area of the site is 0.13 hectares and within Flood Zone 2. The development is classed as 'less vulnerable' within the NPPF. The skip storage area is outside of the 1 in 100 year plus climate change flood event. The topographical survey undertaken by the applicant has shown that the predicted flood level for the 1 in 100 year plus climate change event is below the existing ground level of the site. Therefore the site will not flood.

- 5.5. **Natural England** states that this application is in close proximity to Basingstoke Canal Site of Special Scientific Interest (SSSI). However, given the nature and scale of this proposal, Natural England raises no objection to the proposal being carried out according to the terms and conditions of the application and submitted plans on account of the impact on designated sites. The lack of further comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may be able to make comments that will help the Local Planning Authority (LPA) to fully take account of the environmental value of this site in the decision making process. However, we would expect the LPA to assess and consider the possible impacts resulting from this proposal on Protected species and local wildlife sites e.g. SINC as appropriate and consider the opportunity for biodiversity enhancements.
- 5.6. **Blackwater Valley Countryside Partnership** object to this proposal on the following grounds:
- (i) it extends the industrial operations of the waste recycling facility outside the designated boundary for industrial use into the countryside of the Blackwater Valley;
 - (ii) Aldershot Stubbs industrial area is in a very sensitive location as it lies close to the River Blackwater and the long distance Blackwater Valley footpath. The BVP is concerned over any expansion of the industrial area as it will undoubtedly encroach on and so be detrimental to the riparian environment of the river. It also brings the noise and visual intrusion of the industrial activities closer to users of the footpath;
 - (iii) when Aldershot Stubbs was identified for industrial use a condition was the construction of a bund to contain and screen the industrial activity. Rushmoor Borough Council local plan clearly identifies the industrial area with the area on which the skips are being kept being beyond this and in "Countryside". This application is thus contrary to the local plan;
 - (iv) the County Council has recognised the landscape sensitivity of this site and has conditioned previous permissions with a need to protect and improve the landscape of this particular area (ref 07/00807 and 11/00380);
 - (v) the operators argue that they do have room inside the bunded area for skip storage but only last year agreed to implement a landscaping scheme to protect this area as a condition of 11/00380, and indeed their application made repeated reference to this area of land having established vegetation acting as a screen to their buildings;
 - (vi) concern of the impact on the flood plain. Whilst the majority of the site lies in flood zone 2 and only a small portion in flood zone 3, this site lies in very sensitive area of the valley for flooding as development close to the river has destroyed the majority of the flood plain. Upstream lie many residential properties in Flood Zone

3, and thus any encroachment in Zone 2 or 3 is to be resisted. Bunding so close to the river can only cause problems to other nearby properties in flood events;

- (vii) the skips and bunds should be removed and the condition on landscaping within permission 11/00380 be enforced.

5.7. **Surrey County Council** raises no objection.

5.8. **Guildford Borough Council** raise no objections.

6. Representations

- 6.1. No representations have been made to the County Council from members of the public at the time of writing this report.

7. Commentary

- 7.1. The principle of developing and industrialising land designated as countryside is contrary to Policy CP14 of the Rushmoor Core Strategy 2011 and where a waste use is involved, contrary to Hampshire Core Strategy Policy (HMWCS) DC13 if the site is not considered to be previously developed land (PDL).
- 7.2. The HMWCS under Paragraph 26.42 (supporting text to waste policy DC13) clearly states that Previously Developed Land 'does not include mineral or landfill sites which are restored or are due to be restored.' The NPPF also refers to 'any associated fixed surface infrastructure' (which this site does not have) and also clarifies that PDL 'excludes land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures.'
- 7.3. Accompanying the applicant's 2011 submission was a visual impact assessment which noted that 'Existing vegetation within the site and to the immediate south comprises a mixture of self seeded trees including alder, ash, willow and birch together with an undergrowth including broom, gorse, buddleia and bramble.' The applicant also referred to the site as 'an area of open land that will be landscaped' and submitted photographs of the site showing it to be green and vegetated with ground cover with some trees on the boundary and the edge of the River Blackwater. Therefore until the recent storage use the site had naturally regenerated. It is noted that the applicant's land report states there are some heavy metals in parts of the site, as the site is recorded as an inert site it is not clear whether such contamination has been from this landfill or flytipping. However, it is noted that the submission considers the contamination is not evenly spread across all the site and concludes that the pollution risk to groundwater and the immediately adjacent river Blackwater to be low risk/negligible.

- 7.4. The proposed use of the land for the storage of empty skips and containers is in association with the adjoining waste use. Therefore any permission granted would in effect extend the boundary of the Aldershot Industrial Estate into the countryside contrary to countryside policy. It is considered that this could provide a precedent which could put at risk other countryside areas adjacent to the industrial estate.
- 7.5. The RCS refers to the importance of the green corridor and green infrastructure for amenity, landscape, nature conservation, land recreational purposes within the Blackwater Valley. Paragraph 8.152 states 'The Council also wishes to maintain and enhance the Blackwater Valley area of countryside, which is narrow, sensitive to development and vulnerable in places. It is therefore important to prevent the settlements visually merging, causing coalescence.'
- 7.6. The objections raised by the Blackwater Valley Countryside Partnership, the Parish Council and the Borough Council regarding the sensitive location of this site are noted. This site, although small, forms part of a green lung that continues to prevent the coalescence of development to its north and south. The proposal is contrary to countryside policy and would if it is considered, if granted, create an undesirable planning precedent. Therefore although there are operational merits to the proposal for the applicant, these are considered insufficient to justify departing from the development plan where there is a presumption against such development in the countryside accordingly it is recommended that the application be refused as outlined below.

8. Recommendation

- 8.1. That planning permission for storage of empty skips and containers, with screening bund at 1 Hollybush Lane, Aldershot, Hampshire GU11 2PX (Application No: 12/00513/HCC) be refused for the following reasons:
- (i) the development is proposed on a site in the countryside contrary to Policy DC13 of the Hampshire Minerals and Waste Core Strategy DPD (2007) and CP14 of the Rushmoor Core Strategy (2011); and
 - (ii) the development would have a detrimental effect on the landscape character and amenity of the area and set an undesirable planning precedent for further extensions of Aldershot Stubbs Industrial Estate into adjoining countryside that would be contrary to Policy DC3 and DC8 of the Hampshire Minerals and Waste Core Strategy DPD (2007) and Policy SS1, CP1 and CP14 of the Rushmoor Core Strategy (2011).

CORPORATE OR LEGAL INFORMATION:**Links to the Corporate Strategy**

Hampshire safer and more secure for all:	no
Corporate Improvement plan link number (if appropriate):	
Maximising well-being:	no
Corporate Improvement plan link number (if appropriate):	
Enhancing our quality of place:	yes
Corporate Improvement plan link number (if appropriate):	

Section 100 D - Local Government Act 1972 - background documents

The following documents discuss facts or matters on which this report, or an important part of it, is based and have been relied upon to a material extent in the preparation of this report. (NB: the list excludes published works and any documents which disclose exempt or confidential information as defined in the Act.)

<u>Document</u>	<u>Location</u>
Storage of empty skips and containers, with screening bund at 1 Hollybush Lane, Aldershot, Hampshire GU11 2PX (Application No: 12/00513/HCC) (Site Ref: RM031)	County Planning Economy Transport and Environment Department The Castle Winchester

*Annexe to Reasons for Refusal
(as required by Article 31 of the Town and Country Planning
(Development Management Procedure) (England) Order 2010)*

HAMPSHIRE MINERALS AND WASTE CORE STRATEGY (2007)

Policy DC1 - Sustainable Minerals and Waste Development

Minerals and waste developments will only be permitted if they meet the standards outlined in Policy S1 and, in appropriate circumstances, are designed and constructed to use water and energy efficiently.

Policy DC3 - Impact on Landscape and Townscape

Minerals and waste development will only be permitted if due regard is given to the likely visual impact of the proposed development and its impact on, and the need to maintain and enhance, the distinctive character of the landscape or townscape. If necessary, additional design, landscaping, planting and screening, including planting in advance of the commencement of the development, should be proposed.

Policy DC6 – Highways

Major mineral extractions, landfills and ‘strategic’ recycling, aggregate processing and recovery and treatment facilities, will be permitted provided they have a suitable access to and/or route to the minerals and waste lorry route as illustrated on the Key Diagram. In all cases, minerals and waste development will only be permitted if it pays due regard to the likely volume and nature of traffic that would be generated by the proposal and the suitability of the proposed access to the site and of the road network that would be affected. Consideration should be given to highway capacity, road and pedestrian safety, congestion and environmental impact, and whether any highway improvements are required and whether these could be carried out satisfactorily without causing unacceptable environmental impact.

Policy DC7 – Biodiversity

Minerals and waste developments will only be permitted if due regard is given to the likely effects of the proposed development on biodiversity and, where possible, proposals should conserve and enhance biodiversity. Development likely to adversely impact upon ‘regionally or locally designated sites or protected species’ – designated in adopted Local Plans or Local Development Frameworks – (including Sites of Importance for Nature Conservation (SINCS), Species of Principal Importance for Biodiversity, Regionally Important Geological Sites and Local Nature Reserves) shall only be permitted if the merits of development outweigh the likely impact.

Policy DC8 – Pollution, Health, Quality of Life and Amenity

Minerals and waste development will only be permitted if due regard is given to the pollution and amenity impacts on the residents and users of the locality and there is unlikely to be an unacceptable impact on health and/or the quality of life of occupants of nearby dwellings and other sensitive properties. Where necessary minerals and waste developments should include mitigation measures, such as buffer zones between the site and such properties.

Policy DC11 – Flooding

Minerals and waste development will only be permitted in accordance with the conclusions of a Flood Risk Assessment. Moreover, landfill and hazardous waste facilities, in flood risk zones 3a and 3b, or development that is likely to create an unacceptable risk of off-site flooding, will not be permitted.

Policy DC13 - Waste Management and Recycling

Waste management developments (excluding landfill) will be permitted provided that the site:

- a. Is identified as a site, or within an area suitable for waste management uses, in the Hampshire Waste Management Plan, or
- b. Re-uses/redevelops previously developed land and/or redundant agricultural and forestry buildings (including their curtilages), or
- c. Is within a planned area of large-scale development, or
- d. Is on employment land, preferably co-located with complementary activities, and
- e. Has good access to, the minerals and waste lorry route as shown on the Key Diagram, and where possible, the site enables the use of waterborne and rail freight, and
- f. In the case of recovery and treatment sites, incoming waste shall be subject to pre-treatment, either on or off site to maximise the potential for recycling, and where technically possible, energy will be generated and used and the by-products, including heat, will be reused or recycled, and
- g. In the case of sites providing public access, the site shall be accessible for use by disabled people.

RUSHMOOR CORE STRATEGY (ADOPTED OCTOBER 2011)

Policy CP1 - Sustainable Development Principles

Development will be permitted subject to:

- a. Making efficient use of resources including land, buildings, water, and infrastructure, and giving priority to previously developed land;(65)
- b. Promoting design and layouts which take account of the need to adapt to and mitigate against the effects of climate change, including the use of renewable energy;
- c. Maximising development opportunities in accessible locations;
- d. Supporting initiatives, including travel plans and improvements to public transport, to encourage non-car based travel, as well as measures that reduce the need to travel;
- e. Not causing significant harm to biodiversity, and including measures for biodiversity conservation and enhancement;
- f. No substantial harm to, or loss of significance of, heritage assets or their setting, particularly those of national significance;
- g. Including measures to address flooding and the risks from flooding, particularly close to the River Blackwater and Cove Brook;

- h. Protecting, and where opportunities arise, enhancing the quality of natural resources including water, air and soil, particularly water quality at the River Blackwater and Cove Brook, and air quality on European designated sites;
- i. Including proposals for waste minimisation including use of sustainable construction methods and space for recycling;
- j. Minimising the emission of pollutants into the wider environment.

Policy CP14 - Countryside

Development for which a countryside location is required will not be permitted in the countryside outside the built up areas of Aldershot and Farnborough where it:

- a. Adversely affects the character, appearance or landscape of the countryside, or
- b. Leads to harmful physical or visual coalescence between Aldershot or Farnborough and neighbouring settlements, or
- c. Is detrimental to recreational use.

The Council will provide positive encouragement to schemes which result in environmental and landscape improvements, enhance biodiversity and nature conservation, support better accessibility and promote suitable recreational uses.

Paragraph 8.150 Land located outside the built up areas in Rushmoor is defined as countryside. Countryside policies apply to these areas and the Spatial Strategy (Policy SS1) strictly controls new development here. The character of areas of countryside within the Borough have been defined through a landscape assessment of Rushmoor 1994, updated in 2009.⁽¹²²⁾ The Core Strategy sets out a proactive approach towards the areas of countryside in Rushmoor, focusing on the characteristics of these areas.

Paragraph 8.151 The Blackwater Valley area of countryside, which lies on the eastern boundary of the Borough, is of particular importance for informal recreation, local nature conservation and as part of the Borough's Green Infrastructure. The South East Plan recognised its sub-regional role and identified the need to improve the quality of the Blackwater Valley's natural environment and provide green infrastructure networks. The Council works jointly with other relevant local authorities in the Blackwater Valley to enhance and maintain wildlife and landscape protection and to manage sensitive recreational use of the Valley. Much of this work is co-ordinated through the Blackwater Valley Countryside Partnership.⁽¹²³⁾

Paragraph 8.152 The Council wishes to provide positive encouragement to environmental improvements, accessibility, recreational use, nature conservation and biodiversity. The Council also wishes to maintain and enhance the Blackwater Valley area of countryside, which is narrow, sensitive to development and vulnerable in places. It is therefore important to prevent the settlements visually merging, causing coalescence.