



Torbay Landscape Advice

Torbay Council

Proposed Residential Development at Inglewood, Outline Planning Application P/2017/1133: Landscape and Visual Comments

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Appendix A. Magnitude of Impact Criteria

1. Introduction

This technical report provides landscape and visual comments on Planning Application P/2017/1133 for residential development at Inglewood submitted in November 2017 and revised proposals submitted in March 2018. The outline application comprises residential led development of up to 400 dwellings, with associated facilities and infrastructure.

Jacobs were appointed by Torbay Council in May 2018 to provide an independent second opinion on the landscape and visual impacts of the proposed development at Inglewood, with particular reference to impacts on the South Devon Area of Outstanding Natural Beauty (AONB).

Landscape comments have also been made by Teignbridge Council landscape officer, Paul Bryan, acting in the capacity of consultant to Torbay Council for the original application in November 2017 and revised proposals submitted in March 2018. Letters from the South Devon AONB Unit dated 15 December 2017 (original application) and 10 May 2018 (revised proposals) objecting to the proposed development also provide Landscape comments. These two parties have expressed different opinions on the likely significance of impact of the proposed Inglewood development on the South Devon AONB (referred to as the AONB from here onwards).

In order to inform the comments in this technical report, the following documents have been consulted:

- National Planning Policy Framework (NPPF) (Communities and Local Government, March, 2012).
- Torbay Local Plan (2012 to 2030).
- Torbay Landscape Character Assessment (LCA) Part 1 (May 2010).
- Torbay LCA Part 2 Assessment of Landscape Sensitivity and Capacity (May 2010).
- South Devon AONB Management Plan 2014 - 2019.
- Planning for the South Devon AONB: Planning Guidance (Version 1).
- Brixham Peninsula Neighbourhood Plan Policy Document (2012 - 2030) (Not yet adopted).
- Landscape and Visual Impact Assessment (LVIA) (Nicholas Pearson Associates (NPA), October 2017).
- LVIA Addendum (NPA, March 2018).
- Planning, Design and Access Statement, Inglewood, Paignton, Rev A (Stride Treglown, March 2018).
- Inglewood, Paignton, Green Infrastructure Plan, Rev A (Stride Treglown).
- Framework Landscape and Ecological Management Plan (LEMP) Inglewood, Paignton (Stride Treglown, March 2018).
- Farm Management Plan, Inglewood (Stride Treglown, October 2017).
- Teignbridge Council Landscape Officer comments on original application (Undated).
- Teignbridge Council Landscape Officer comments on revised application proposals (March 2018).
- South Devon AONB Unit comments on original application (15 December 2017).
- South Devon AONB Unit comments on revised application proposals (10 May 2018).

The initial desk-top review was followed by a site visit on 24 May 2018, undertaken jointly with the applicant's agents.

The structure of this technical report is set out as follows:

- 1) Introduction.
- 2) Limitations of advice.
- 3) Description of the Site and landscape context.

- 4) Landscape comments by others.
- 5) Key landscape planning policy.
- 6) Site visit.
- 7) Landscape and visual impact.
- 8) Conclusions.

2. Limitations of advice

In compiling this technical report, the following limitations are noted:

- On the day of the site visit, it was not possible to gain access onto the application site (the Site). Comments are therefore made on the basis of visits made to adjacent roads and surrounding publicly accessible viewpoints including Public Rights of Way (PRoW), as set out below under section 6 on the site visit.
- On the day of the visit, visibility was described as 'good' (www.metoffice.gov.uk). However, on meeting at the Site in the afternoon, distant visibility became slightly hazy and later in the day, distant north-easterly views towards the urban area of Torquay on the far side of Torbay were muted by haze.
- Only a selection of representative viewpoints presented in the applicant's LVIA were visited on the site visit, as outlined in Section 6.
- No verification by Jacobs has been undertaken of the applicant's Visually Verified Montages (VVM).
- Although reference is made to cumulative effects, a full review of cumulative effects on the AONB is outside the scope of this technical report.
- Specialist advice on the effects of lighting is outside the scope of this technical report.

3. Description of the Site and landscape context

The Site lies on the western edge of the urban area of Goodrington, Paignton, approximately 0.5 kilometres (km) from the AONB. Two Conservation Areas lie at a similar distance; Waddeton to the south-west and Galmpton to the south-east. The landscape of the Site is characterised by Torbay Landscape Character Type (LCT) 1: Rolling Farmland (Torbay LCA Part 1) and the North Galmpton Area of Local Character (AoLC) (Torbay LCA Part 2). Key landscape characteristics of the Rolling Farmland LCT of particular relevance to the Site and surrounding area are described as *“a rolling well farmed landscape with an irregular pattern of field boundaries and occasional hilltop woodland”*.

The Site comprises five fields (numbered 1 to 5 in the applicant’s LVIA, clockwise from the central-east field 1) with a mix of arable land and pasture, generally sub-divided by hedgerow field boundaries. The Site lies at the head of a small broadly north-south orientated dry tributary valley, which converges with the Dart Estuary just north of Galmpton Creek. The Site is typical of the rolling topography of the corresponding LCT, ranging from approximately 60 metres (m) Above Ordnance Datum (AOD) to the south and 72m AOD to the north; The central part of the Site is relatively flat adjacent to Brixham Road, however, the northern Field 5 slopes south and south-westwards towards the tributary valley and the west part of the Site (Field 3 and 4) slopes westwards to the base of the valley. The most southerly part of the Site east of Nords (Field 2) slopes southwards towards another tributary valley of the Dart Estuary.

To the east, the Site is bounded by the A3022, Brixham Road, which forms a strong landscape boundary, partially lined by mature trees. To the south, the Site (Field 1 to the east and Field 2 to the south) adjoins agricultural land and is partially enclosed by a combination of boundary hedgerows containing frequent mature trees and by the distinctive copse of Nords, outwith the Site boundary. However, the Site is more open to the west (Field 3, 4 and 5). The western Site boundary is partly defined by a low managed boundary hedgerow with some mature trees in the Field 4 boundary. The western boundary of the northernmost Field 5 is largely undefined and open to the west. The northern boundary of the Site (Field 5) is partly defined by a hedgerow containing some mature trees, with approximately half defined by what appears to be the remnants of a former hedgerow.

As confirmed in the applicant’s LVIA (October 2017) and LVIA Addendum (March 2018), there are a range of views of the Site from publicly accessible viewpoints within the surrounding landscape, including views from the AONB. The Site forms part of the AONB setting on the edge of the Dart estuary valley.

Landscape features and landmarks in the immediate vicinity of the Site comprise:

- The distinctive mixed woodland copse of Nords, adjoining the Site to the south on a gentle ridge between the two tributary valleys;
- The slightly elevated line of bungalows (Brixham Road) adjoining and opposite to the north-east part of the Site; and
- Panoramic views towards hilly ground within the AONB from Brixham Road adjoining the north-east part of the Site.

The Site extent coincides with the northern part of the North Galmpton AoLC, albeit the AoLC extends slightly further north to encompass part of the recent White Rock development. The description of the North Galmpton AoLC (Torbay LCA Part 2) makes reference to the land sloping broadly westwards towards the River Dart estuary and AONB. It continues:

“Much of the area is relatively open farmland and the northern part is more open and this allows long distance views to the south west to hills beyond the Dart within the AONB, whilst the southern part of the area is screened from the west by a combination of a slight ridge and field boundaries...”

The AoLC description does not detail where the division lies between the more open land to the north and the more enclosed land to the south. However, there is a gentle ridge of up to approximately 65m AOD between the two tributary valleys of the Dart Estuary referred to above, on which Nords is located. Projecting a notional line east of Nords to Brixham Road, land within the North Galmpton AoLC to the south of this line lies within the

tributary valley adjoining Galmpton, which provides some enclosure. Most of the Site lies to the north of Nords, where there is less visual enclosure to the west.

The AoLC description also notes that:

“The existing urban edge at Goodrington, abutting the road on the eastern boundary of this area is quite well integrated by mature trees and hedges along the road and within adjoining detached properties although the traffic is visible and audible.”

The main exception to this integration is the slightly elevated line of bungalows adjacent to the Site on Brixham Road referred to above, which are clearly discernible in many of the surrounding viewpoints to the south-west.

Key elements of the visual sensitivity with relevance to the Site are considered in the North Galmpton AoLC description to comprise *“largely open views across most of the area”*, the *“seamless visual connection with [the] S Devon AONB”* and that the *“land provides [a] broad setting of the of the urban area and provides [a] buffer to [the] AONB.”* The broad rating of overall sensitivity of this AoLC is highly sensitive, noting that parts of the southern area are considered to be slightly less sensitive due to their visual containment, as discussed above. However, the AoLC is considered to have only limited potential to accommodate change without substantial wider impact.

The Site encompasses the upper east side and head of a tributary of the Dart estuary valley and therefore whilst outside the AONB, has a strong physical geographic connection with the Dart valley which forms the backbone of the nearby AONB.

4. Landscape comments by others

Landscape comments on both the original planning application and the revised application proposals submitted in March 2018 have been provided by the Teignbridge Landscape Officer acting for Torbay Council and by the South Devon AONB Unit in response to statutory consultation. This technical report concentrates principally on comments relating to the revised application.

The Teignbridge Landscape Officer was satisfied with the methodology used to undertake the applicant's LVIA and broadly agreed with the findings of the LVIA (October 2017) on the original application that the proposed development would not result in any significant landscape impacts. However, the comments did not include any analysis supporting the view that landscape impacts would not be significant. There was no change in this opinion in the subsequent landscape comments made on the revised application proposals.

In comments on the original application, the Teignbridge Landscape Officer raised some reservations on the proposed lighting depicted in the night-time photomontages, concluding that subject to confirmation of the accuracy of photomontages by a specialist, he was in agreement with the findings of the LVIA that there would be no significant effects. The Landscape Officer concluded that the isoline drawings provided in relation to the revised planning application proposals, mapping the spread of proposed lighting, suggest that lighting would be relatively well contained.

By contrast, the South Devon AONB Unit have objected to the proposed development on landscape grounds, a position reinforced in their letter dated 10 May 2018 on the revised planning application proposals as follows:

"The proposal does not conserve and enhance the natural beauty of the South Devon Area of Outstanding Natural Beauty (AONB), would result in unacceptable harm to the natural beauty and special landscape qualities of the nearby South Devon AONB, is contrary to the principal material protected landscape policies and fails to conserve and enhance the rural setting to the South Devon AONB."

The AONB Unit consultation response considers the Site to be in "a sensitive location that makes an important and substantial contribution to the natural beauty of the South Devon AONB... contributes to the rural setting of the South Devon AONB..." and "forms a countryside backdrop to many iconic views across the Dart Estuary." It is also considered that the Site "provides both a buffer and transition zone between the urban areas of Torbay to the north and the Dart Estuary within the AONB to the south. This rural buffer helps maintain the tranquillity of the AONB..."

Other key areas of concern for the AONB Unit are expressed as follows:

- *"The proposal effectively extends the developed edge of Paignton toward the AONB boundary, reducing the rural setting to the AONB in this area..."* and *"introduces a marked change that harms AONB special qualities";*
- *"The site is visible in more distant elevated views from parts of the AONB including regional recreation routes";*
- *"The proposal would lead to a loss of open countryside, create urban sprawl and would erode rural character";*
- The potential for erosion of the tranquillity and dark natural nightscapes enjoyed from within the AONB; and
- The LVIA findings do not appear to be consistent with the description of the North Galmpton AoLC (Torbay LCA Part 2 Assessment of Landscape Sensitivity and Capacity).

The comments from the AONB Unit considered that the applicant's LVIA conclusions *"substantially underplay the landscape scale of effects and harm to the South Devon AONB"* even after allowing for the revised proposals and range of proposed mitigation measures.

This technical report provides an independent second opinion on the AONB effects set out in the AONB Unit consultation response outlined above.

5. Key landscape planning policy

This technical report focusses on the main policies of specific relevance to the AONB, rather than providing a detailed review of all relevant landscape planning policy as follows:

5.1 Legislation

The legal framework for AONBs is provided by the Countryside and Rights of Way Act 2000, with the primary statutory purpose of the designation being to conserve and enhance the natural beauty of the AONB.

5.2 National Planning Policy

NPPF (March, 2012) provides the overarching national planning policy framework. Of particular relevance, paragraph 115 states that:

“Great weight should be given to conserving landscape and scenic beauty in ... Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty...”

5.3 Torbay Planning Policy

At the local level, Torbay Local Plan policy SS8 states that:

“All development should have regard to its environmental setting and should positively contribute to the conservation and enhancement of the natural assets and setting of the Bay.”

The objectives set out in policy SS8 include a requirement for development proposals outside the AONB to conserve and enhance the distinctive landscape character of Torbay and to ensure that development proposals do not have an unacceptable impact on the special qualities of an adjoining AONB. The policy also explains that:

“In assessing new development outside AONB, the value of natural landscapes will be carefully considered, using the Torbay Landscape Character Assessment and other relevant management plans, to help ensure the objectives for their conservation are met.”

5.4 South Devon AONB

South Devon AONB Management Plan 2014 – 2019

The South Devon AONB Management Plan 2014 – 2019 sets out the special qualities of the AONB, with those most relevant to the Inglewood planning applications as follows:

- *“Iconic wide, unspoilt and expansive panoramic views.*
- *Areas of high tranquillity, natural nightscapes ...*
- *A variety in the setting to the AONB ...”.*

5.4.1 Iconic wide, unspoilt and expansive panoramic views

The rationale provided for this special quality explains that the *“open and uninterrupted panoramic views from high ground ... are resource of exceptional value”* and that *“vantage points with views that only contain natural features ... represent a diminishing, highly valued resource ...”*. High inland locations offering wide (270 degree) panoramic views are considered to be limited in number. Gate gaps at field entrances are considered to provide important ‘windows’ on the AONB landscape.

5.4.2 Areas of high tranquillity and natural nightscapes

The rationale for the special quality explains that:

“The dark sky and natural nightscape resource of the AONB is particularly highly valued...” and

“Away from the tightly focussed waterside settlements with harbours, historic cores and areas of moorings, the estuaries remain tranquil, remote and wild with little sense of human activity or presence.”

5.4.3 A variety in the setting to the AONB

The rationale for the special quality notes that:

“The setting to the AONB provided by surrounding areas of land, sea and urban settlement together with the inter-visibility between the AONB and these areas is of great significance...” and

“The inland boundary of the AONB is mostly not marked by a distinct change in scenery and the landscape character continues seamlessly into the neighbouring countryside. The hinterland of the AONB – particularly the rural largely undeveloped countryside, farmland and woodland – is particularly significant as a setting for the AONB.”

Planning for the South Devon AONB: Planning Guidance

The Planning for the South Devon AONB: Planning Guidance (Version 1) sets out what is meant by the ‘setting’ of an AONB. In the guidance:

“The term in ‘the setting’ of the AONB is used to refer to areas outside the AONB within which changes or activities are likely to have effects on the AONB.”

The guidance explains at Section 2.4 that the underlying principle of the statutory duty is that land in the AONB should be conserved and enhanced regardless of where any effect on it arises from and that:

“Therefore the effect of development proposals outside the AONB on views within and views out of an AONB are of particular relevance.”

5.5 Brixham Peninsula Neighbourhood Plan Policy Document (2012 - 2030)

The emerging Brixham Peninsula Neighbourhood Plan Policy Document (2012 - 2030) identifies land between Galmpton and Paignton encompassing the Site as a Settlement Gap, within which Policy E3 seeks to preclude development that would visually or physically close the gap between urban areas or harm the openness or landscape character of the area identified.

6. Site visit

In order to gain an understanding of the actual level of impact on the AONB, Jacobs made a site visit jointly with the Torbay Council Case Officer and the applicant's agent, planning consultant and landscape architect on 24 May 2018. The Teignbridge Landscape Officer and author of the AONB Unit objection were also invited but were unable to attend.

A stop was first made to view the Site from the adjacent Brixham Road, followed by a visit to other nearby representative viewpoints from publicly accessible locations and a range of representative viewpoints within the AONB, all of which are identified in the applicant's LVIA. Two viewpoints within the AONB were re-visited after dark to view the effect of existing lighting in the vicinity of the Site and wider context of Torbay.

The following viewpoints were visited during daylight hours. (Viewpoint (VP) numbering refers to the numbering in the applicant's LVIA, with the locations shown on LVIA figure 8b Visual Receptors and Viewpoint Locations):

- Between VP 13 and 14 (Outside Brixham Road bungalows adjacent to the northern part of the Site);
- VP 15 Waddeton Road;
- VP 16 Stoke Gabriel Road;
- VP 9a Kennel Lane (Near Galmpton reservoir);
- VP 8c John Musgrave Heritage Trail;
- VP 5a Downton Cross;
- VP 7a and 7b Fire Beacon Hill (from the PRow);
- VP 6a Fire Beacon Hill (from the PRow); and
- VP 3 (Road between Cornworthy and East Cornworthy).

The following viewpoints were re-visited in hours of darkness:

- VP 6a Fire Beacon Hill; and
- VP 7a Fire Beacon Hill.

In order to inform the opinion presented in this technical report on the effects of the proposed development on the AONB, an independent visual impact assessment has been made on the level of effects likely to be experienced by receptors from the above viewpoints. The assessment presented in the section below alongside the findings of the assessment in the applicant's LVIA Addendum (March 2018) has been informed by both desk study and the site visit made on 24 May 2018.

7. Landscape and visual impact

The overall conclusions at paragraph 11.1.1 of the applicant's LVIA Addendum (which mirrors the conclusions in the October 2017 LVIA) are potentially misleading; The changes introduced in the revised application may reduce landscape and visual impacts but they would not, as suggested, *"be beneficial in both landscape and visual terms, particularly in relation to the Valley Side Landscape, the local AONB as a whole within the study area, and the Waddeton CA [Conservation Area]; and their views"*.

The LVIA Addendum concludes that *"during operation, there will be some minor landscape and minor visual effects that cannot be fully mitigated"* but that *"these would decrease with time and are judged to be **not significant**."* However, this statement omits to mention any of the moderate or greater landscape or visual effects that are assessed in the applicant's LVIA, including Moderate to Minor adverse visual effects for road users on Greenway Road within the AONB (VP 19), reducing to Minor adverse to Negligible (assumed by year 10). It is surprising that not even the effects on local landscape character are considered to be significant in the applicant's LVIA, given the proposals to develop up to 400 dwellings on the Site and the consequent loss of rural landscape to urban development.

The applicant's criteria for assessing potential effects are set out in the Methodology Appendix I of the LVIA (October 2017). Criteria are provided for landscape and visual sensitivity, however, no criteria are provided for the magnitude of impact (a key component of LVIA). Criteria are also provided for 'levels of effect' and paragraph 1.8.15 of the LVIA explains that following the assessment of sensitivity and magnitude of change, the 'level of effect' has been assessed. This would suggest that the 'levels of effect' criteria relate to significance, however, this is not explicit in Appendix I.

Section 1.11 of the LVIA explains how the overall significance of residual effects has been assessed. A shortcoming of the explanation at paragraph 1.11.1 is that it only cites the highest levels of sensitivity and magnitude of impact as factors giving rise to significant effects. However, it is widely recognised that a lesser magnitude of change, for example, a minor magnitude on a highly sensitive receptor can also give rise to significant effects and vice versa. Section 1.11 also provides alternative criteria which it is explained *"may be used for determining whether the overall effect on landscape character or views is significant or not"* (applicant's emphasis). However, it is not clear from the LVIA or LVIA Addendum whether these criteria have been applied in the applicant's assessment.

The VVMs illustrating the proposed development at year 1 of operation, following completion of construction, show 5 years' growth for tree planting on the outer site perimeter on the basis that planting mitigation would be implemented in advance of construction. However, the assumed height of growth after 5 years of 4.5 to 5 metres is considered optimistic, depending on the size of stock and species proposed. Even if the height is reached by trees planted as advanced nursery stock or by fast growing species they would not have thickened out sufficiently to form an effective visual barrier.

The VVM 14 year 10 view appears misleading because the belt of trees shown on the Green Infrastructure Plan doesn't look wide enough to achieve the density of screen planting shown in winter. It is also questioned whether the tidiness of the allotments depicted at year 1 and 10 is realistic. Furthermore, the VVM 14 year 1 view suggests an indistinct housing architecture at odds with the character of the surrounding landscape.

The following table sets out Jacobs visual impact assessment of the likely visual effects during operation (on completion of construction, when the proposed development is in use) from the representative viewpoints visited on the site visit, in comparison to the applicant's assessment. It is acknowledged that effects are likely to be greater during construction but would be temporary and the table below is therefore focussed on effects during operation for the purposes of this technical report.

Table 7.1 : Jacobs Visual impact assessment during operation

Notes

It is acknowledged that in some cases the applicant's assessment may not be directly comparable to the Jacobs assessment. This is because the Jacobs assessment is based on the viewpoints visited on the site visit undertaken jointly with the applicant, whereas the applicant's assessment is typically based on one or more representative viewpoints. Nevertheless, the table below shows the main areas of difference between the Jacobs and applicant's assessment. Where more than one representative viewpoint forms the basis of the applicant's assessment, this is noted in the third column below.

As no criteria have been provided in the applicant's LVIA for assessing the magnitude of impact, the criteria from 'Interim Advice Note 135/ 10 Landscape and Visual Effects Assessment' (Highways Agency, November 2010) (appended to this technical report at Appendix A for information) have been used for the Jacobs assessment of the magnitude of effects. Whilst these criteria are specifically for highways schemes, they have been selected for the purpose of this exercise, as they are widely used and transferable to other types of development. The Jacobs assessment is otherwise based on the criteria provided in the applicant's LVIA (October 2017) at Appendix I Methodology. A level of effect ('significance level' after taking into consideration the sensitivity of the receptor and the magnitude of effect) of moderate and above are considered to be significant.

Representative viewpoint (VP) number (Applicant's Visually Verified Montage (VVM))	Designation of VP location and receptor type	Sensitivity (Applicant's LVIA criteria)	Description of change likely to result from proposed development	Magnitude of impact (IAN 135/10 criteria)	Level of effect (Applicant's criteria)	Significance (Applicant's criteria)
VP 14 Brixham Road (No LVIA VVM)	No designation. Residents on the edge of Goodrington. Road users.	Applicant: High and Medium (including VPs 11 & 12). Jacobs: High (Residents)	Jacobs: Proposed housing would substantially obstruct residents' existing long distant panoramic views across the Site towards high ground in the AONB beyond the Dart estuary and completely change the composition of the existing views enjoyed. Similar visual effects would also be experienced by road users travelling along the Brixham Road, including vehicle travellers, cyclists and pedestrians. Although the sensitivity of road users is generally considered to be lower than for residents, the long-distance views south-west to the hills beyond the Dart within the AONB is recognised as a key characteristic in the North Galmpton AoLC and this section of Brixham Road is one of the few publicly accessible locations within the local area from which to obtain such views.	Applicant: High to Medium and Medium Jacobs: High	Applicant: Substantial to Moderate and Minor Adverse Jacobs: Substantial Adverse	Applicant: Not specified Jacobs: Significant

Representative viewpoint (VP) number (Applicant's Visually Verified Montage (VVM))	Designation of VP location and receptor type	Sensitivity (Applicant's LVIA criteria)	Description of change likely to result from proposed development	Magnitude of impact (IAN 135/10 criteria)	Level of effect (Applicant's criteria)	Significance (Applicant's criteria)
		Medium (Road users)				
VP 15 Waddeton Road (LVIA, VVM 15)	No designation. Road users.	Applicant: Medium Jacobs: Agree	Jacobs: Brief glimpsed view of proposed housing breaching the skyline for passing vehicle travellers and cyclists, through field gate opening in roadside hedgerow and occasional walkers pausing for the view. The proposed development would represent an extension of the existing urban edge of Paignton into the adjacent rural landscape, making urban development a more prominent feature in the landscape when compared to the existing view.	Applicant: Medium Jacobs: Agree	Applicant: Moderate reducing to Minor Adverse Jacobs: Agree based on the limited location from which this view can be experienced.	Applicant: Not specified Jacobs: Significant in year 1, reducing to not significant in year 10 when planting mitigation. has become effective.
VP 16 Stoke Gabriel Road (LVIA, VVM 16)	AONB No designation but close to Waddeton Conservation Area. Road users.	Applicant: High and medium (including VP 17) Jacobs: High	Jacobs: According to the applicant's VVM 16, there would be no views of proposed development at year 1 or year 10 of operation, with the exception of proposed planting in Field 3.	Applicant: Low/Negligible Jacobs: Neutral assuming VVM is correct	Applicant: Minor Adverse/Negligible Jacobs: Neutral assuming VVM is correct	Applicant: Not specified Jacobs: Not significant

Representative viewpoint (VP) number (Applicant's Visually Verified Montage (VVM))	Designation of VP location and receptor type	Sensitivity (Applicant's LVIA criteria)	Description of change likely to result from proposed development	Magnitude of impact (IAN 135/10 criteria)	Level of effect (Applicant's criteria)	Significance (Applicant's criteria)
VP 9a Kennel Lane (Near Galmpton reservoir) (LVIA, VVM 9a)	AONB Road users.	Applicant: High (including VP 9b) Jacobs: Agree	Jacobs: Clear, elevated passing view of proposed housing across most of the Site for passing vehicle travellers, cyclists and walkers. New housing would be clearly noticeable as a discordant element, extending urban development into the open rural landscape in the foreground of distant high ground. Although the proposed development would be seen in the context of the existing urban area of Galmpton in the middle distance and more distant views of Paignton beyond, it would nevertheless represent a substantial westward urban extension into open countryside, which would not be in keeping with the existing landscape pattern. Mitigation planting would only partially soften the view by year 10.	Applicant: Low Jacobs: Moderate	Applicant: Minor Adverse reducing to Minor Adverse /Negligible Jacobs: Moderate Adverse	Applicant: Not specified Jacobs: Significant
VP 8c John Musgrave Heritage Trail (LVIA, VVM 8c)	AONB Heritage Trail users.	Applicant: High (including VP 8a & 8d) Jacobs: Agree	Jacobs: This view is similar to that described for VP 9a above; Clear, oblique elevated prolonged view of proposed housing across most of the Site for trail walkers. New housing would be clearly noticeable as a discordant element, extending beyond the well integrated existing urban edge defined by Brixham Road and associated mature trees, into the open rural landscape on the plateau flanking the north-eastern slopes of the Dart estuary valley. Although the proposed development would be seen in the context of the existing urban area of Galmpton and Paignton beyond, it would nevertheless represent a substantial westward urban extension into open countryside, which would not be in keeping with the existing landscape pattern. Mitigation planting would only partially soften the view by year 10, with the perception of the extended urban area remaining.	Applicant: Medium reducing to Low Jacobs: Medium	Applicant: Moderate to Minor Adverse. Jacobs: Moderate Adverse	Applicant: Not specified Jacobs: Significant
VP 5a Downton Cross	No designation.	Applicant:	Jacobs: Distant passing view for road users, with the proposed development just discernible in the context of the existing urban area.	Applicant: Low	Applicant: Minor	Applicant: Not specified

Representative viewpoint (VP) number (Applicant's Visually Verified Montage (VVM))	Designation of VP location and receptor type	Sensitivity (Applicant's LVIA criteria)	Description of change likely to result from proposed development	Magnitude of impact (IAN 135/10 criteria)	Level of effect (Applicant's criteria)	Significance (Applicant's criteria)
(No LVIA VVM)	Road users.	High (Implies other VPs but not clear from applicant's LVIA Table 4b) Jacobs: Medium		Jacobs: Agree	Adverse Jacobs: Agree	Jacobs: Not significant
VP 7a & 7b Fire Beacon Hill	AONB Public Rights of Way (PROW) users.	Applicant: High (including VPs 6a, 6b, and 7c to 7e inclusive). Jacobs: Agree	Jacobs: Sequential, elevated open views across the Dart estuary of proposed housing for footpath walkers. New housing would be clearly visible in front of the existing urban edge of Paignton, which is currently well defined by Brixham Road and the associated mature roadside trees. The proposed development would result in a clear reduction in the amount of open landscape forming the buffer between the AONB and existing urban area. New housing in Field 4 (incorrectly annotated on the existing view shown on LVIA figure 5) and in Field 5 would extend down the slopes of the tributary of the Dart estuary valley, a characteristic landform within the AONB setting. Although the Site is currently seen in the context of the existing urban area of Paignton and Torquay, the existing urban edge of Paignton is well integrated into the landscape and in the vicinity of the Site is perceived as a narrow ribbon of development generally softened by roadside trees and hedgerow along Brixham Road. By contrast, the more distant urban area of Paignton and Torquay curving around Torbay is seen as a more remote feature in the landscape.	Applicant: Low Jacobs: Medium	Applicant: Minor Adverse Jacobs: Moderate Adverse	Applicant: Not specified Jacobs: Significant

Representative viewpoint (VP) number (Applicant's Visually Verified Montage (VVM))	Designation of VP location and receptor type	Sensitivity (Applicant's LVIA criteria)	Description of change likely to result from proposed development	Magnitude of impact (IAN 135/10 criteria)	Level of effect (Applicant's criteria)	Significance (Applicant's criteria)
			At this elevation, mitigation planting would do little by year 10 to mitigate the loss of rural buffer to the AONB or the adverse effect on landscape pattern resulting from the spread of urban development into the tributary valley of the Dart estuary.			
VP 6a Fire Beacon Hill	AONB Public Rights of Way (PROW) users	Applicant: High (including VPs 7a to 7e inclusive) Jacobs: Agree	<p>Jacobs: This view is similar to that described for VP 7a above; Prolonged, elevated open view across the Dart estuary of proposed housing for footpath walkers. New housing would be clearly visible in front of the existing urban edge of Paignton, which is currently well defined by Brixham Road and the associated mature roadside trees.</p> <p>The proposed development would result in a clear reduction in the amount of open landscape forming the buffer between the AONB and existing urban area. New housing in Field 4 and in Field 5 would extend down the slopes of the tributary valley of the River Dart, a characteristic landform within the AONB setting.</p> <p>Although the Site is currently seen in the context of the existing urban area of Paignton and Torquay, the existing urban edge of Paignton is well integrated into the landscape and in the vicinity of the Site is perceived as a narrow ribbon of development generally softened by roadside trees and hedgerow along Brixham Road. The more distant urban area of Paignton and Torquay curving around Tor Bay is seen as a more remote feature in the landscape.</p> <p>At this elevation, mitigation planting would do little by year 10 to mitigate the loss of rural buffer to the AONB or the adverse effect on landscape pattern resulting from the spread of urban development into the tributary valley of the River Dart.</p>	Applicant: Low Jacobs: Medium	Applicant: Minor Adverse Jacobs: Moderate Adverse	Applicant: Not specified Jacobs: Significant
VP 3 (Road between	AONB Road users.	Applicant:	Jacobs: Brief glimpsed view at field gate opening in roadside hedge for road users, including vehicle travellers, cyclists and walkers, of proposed housing	Applicant: Low	Applicant: Minor	Applicant: Not specified

Representative viewpoint (VP) number (Applicant's Visually Verified Montage (VVM))	Designation of VP location and receptor type	Sensitivity (Applicant's LVIA criteria)	Description of change likely to result from proposed development	Magnitude of impact (IAN 135/10 criteria)	Level of effect (Applicant's criteria)	Significance (Applicant's criteria)
Cornworthy and East Cornworthy		High (including VPs RV4a, RRV5c, RV7a) Jacobs: Agree	on the edge of Paignton. New housing would be seen as a slight intensification of existing development partially softened by existing intervening trees. However, it would increase the perception of urban development just below the skyline.	Jacobs: Agree	Adverse Jacobs: Agree	Jacobs: Significant (based on the high sensitivity of the receptor).

Based on the site visit undertaken to Fire Beacon Hill, the Site is seen in the context of substantial existing lighting in Paignton and the wider area of Torbay and Torquay beyond and the associated sky glow. VVM 7a (figure J) provides an illustration of existing and proposed lighting, which shows a slight increase in the area of lighting in front of Brixham Road and associated lighting columns, when compared to the existing view. However, given the proposals to mitigate the effects of new lighting outlined in the Planning, Design and Access Statement, it is not considered that the night-time visual effects of the additional lighting on the AONB nightscape would be significant.

No assessment of cumulative effects has been undertaken for the purposes of this technical report, however, the VVMs prepared for VP 8c and VP 9a illustrate future completion of housing in a later phase of the White Rock development on the former Waddeton Industrial Estate north of Long Road, which suggests that there would be significant cumulative effects for walkers and road users respectively, from these viewpoints. It is also considered that residential development on the Inglewood Site could set a precedent leading to further infill development to the south-east between the Site and Galmpton in the future, on land not encompassed by the LEMP or Farm Management Plan.

8. Conclusions

This technical report provides an independent second opinion on the likely impacts on the South Devon AONB. In order to inform this opinion, a desk-top review of relevant information has been undertaken, followed by a joint site visit undertaken in May 2018 with the applicant's agents to a selection of representative viewpoints.

The Site forms part of the setting of the AONB north-east of the River Dart valley, being clearly visible from a number of representative viewpoints from publicly accessible locations within the AONB, that would be experienced by a variety of users including vehicle travellers, cyclists and walkers.

The Visually Verified Montages provided with the LVIA are a helpful tool with which to inform the assessment of landscape and visual effects but there is no substitute for visiting the Site and comparing the size of images presented to the actual scale of the view.

Following an independent visual impact assessment presented in this technical report, it is considered that the landscape and visual impacts of the revised planning application proposals would be greater than that reported in the applicant's LVIA and Addendum. The proposed development would result in significant residual adverse visual effects on some representative viewpoints within the AONB, including views from PRowS on Fire Beacon Hill and from the John Musgrave Heritage Trail, amongst others. Whilst extensive mitigation is proposed, it is not considered that this would overcome the fundamental impacts of the proposed development on the setting of the AONB.

Significant adverse visual effects would arise from the extension of the existing urban edge of Paignton westwards into the rural landscape, which forms part of the AONB setting and helps maintain the tranquillity of the AONB. There is no current logical boundary for the westward urban extension of Paignton, which is currently well defined by the strong physical boundary provided by the Brixham Road and associated mature roadside trees. The boundary of the Site is predominantly open to the west in the direction of the AONB and this lack of natural enclosure has resulted in the need to provide extensive mitigation in the form of perimeter 'native woodland belt' planting. The need for this measure is acknowledged in the LEMP which refers, among other things, to *"the advance planting needed to integrate the site into the wider landscape and visual context"* However, the planting portrayed in the Green Infrastructure Plan would be inconsistent with the existing landscape pattern of irregular but angular fields, defined by hedgerows with occasional mature trees and hilltop woodland.

Whilst the number of affected views is relatively limited, with two main AONB clusters south of Dittisham and south of Galmpton, iconic panoramic views are identified as a Special Quality of the AONB. The AONB Management Plan refers to open and uninterrupted panoramic views from high ground as a resource of exceptional value and that vantage points with views that only contain natural features represent a diminishing, highly valued resource. These views are therefore highly sensitive to the type of change proposed.

No independent assessment of the cumulative effects of other proposed or consented development has been undertaken for the purposes of this technical report, however, Visually Verified Montages submitted with the LVIA illustrating future completion of housing in a later phase of the White Rock development on the former Waddeton Industrial Estate north of Long Road, suggest that there would be significant cumulative effects.

It is not considered that the night-time visual effects of the proposed development on the AONB nightscape would be significant, given the mitigation proposed.

At the neighbourhood level, the proposed development would be contrary to the Brixham Neighbourhood Plan, which seeks to preclude development that would visually or physically close the Settlement Gap between the urban areas of Paignton and Galmpton or harm the openness or landscape character of the area.

At the local level, the proposed development is inconsistent with the character of the North Galmpton AoLC, described in the Torbay Landscape Character Assessment as highly sensitive land providing a buffer to the AONB, with only limited potential to accommodate change without substantial wider impact.

At the national level, the proposed development would adversely affect the special qualities of an adjoining AONB, specifically, iconic wide panoramic views, tranquillity and the rural largely undeveloped countryside AONB hinterland. The underlying principle of AONB legislation and policy is that land within the AONB should be conserved and enhanced regardless of where any effect on it arises. Despite the proposed mitigation, significant adverse residual effects of the proposed development on the setting of the AONB would remain.

Appendix A. Magnitude of Impact Criteria

Magnitude of Impact	Typical criteria descriptions
Major	The project, or a part of it, would become the dominant feature or focal point in the view.
Moderate	The project, or a part of it, would form a noticeable feature or element of the view, which is readily apparent to the receptor.
Minor	The project, or a part of it, would be perceptible but not alter the overall balance of features and elements that comprise the existing view.
Negligible	Only a very small part of the project would be discernible, or it is at such a distance that it would form a barely noticeable feature or element of the view.
No change	No part of the project, or work or activity associated with it, would be discernible.

Source: Interim Advice Note 135/ 10 Landscape and Visual Effects Assessment' (Highways Agency, November 2010), Annex 2, Table 2 Magnitude of Impact and Typical Descriptors.