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→ **TIDCOMBE HALL | TIVERTON**

ASSESSMENT OF SUBMITTED LANDSCAPE PROPOSALS

APPLICATION NO : 24/00045/MOUT

on behalf of MID DEVON COUNCIL

JANUARY 2025



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The outline development proposal 24/00045/MOUT for land at Tidcombe hall in Tiverton located at grid reference: 297452 : 112203, comprises an application for the erection of up to 100 dwellings to include the conversion of Tidcombe Hall and its outbuildings, provision of community growing area, public open space, associated infrastructure, ancillary works and access with all other matters reserved.

This report is intended to provide an objective review of the applicants' LVIA in order to support Mid Devon Council's decision making towards determining the planning application.

As part of the review of the information submitted, and as a precursor to reevaluating the findings of the LVIA, a series of quotes have been included that refer to the National Planning Policy Guidance; definitions of the term **setting**; the reasons for designation of the conservation area and the value of designated and locally listed heritage assets at this site. These comments are relevant to assist in an understanding of place and to describe the status quo of Tiverton's development boundary, and the character and quality at the interface of townscape and countryside at this location. A commentary on the character of the landscape design of the proposed development is given in relation to the definitions of setting in order to see whether the proposals would enhance or better reveal the significance of the heritage assets at this location as set out in the NPPF 2024.

The clear breaching of the development boundary which would be achieved if the proposed development were to go ahead is manifest in the masterplan which shows a suburban development surrounded by open land on all sites, linked only by its access route to a lane along the town's boundary. The redevelopment of the hall and its environs would change the character of a local heritage asset.

The applicants' LVIA has been reassessed, using the methodology and matrices provided to evaluate the potential impacts on both landscape and visual resources. The re-examined impacts on landscape resources result in 6 significant adverse judgements, (5 more than were set out in the applicants' assessment) 2 moderately positive judgements, 1 assessment that is not relevant to the site, and 1 negligible assessment.

On visual impact a total of 18 viewpoints were evaluated and of these the potential visual impact of 10 viewpoints was agreed as indicated in the LVIA. Of the remaining 8 viewpoints the re-examined impacts on visual resources indicate that at day one there will be 1 major adverse effect, 4 moderate adverse impacts and 1 minor adverse and 1 minor negligible effect. (The impact on Lime Tree Mead is agreed.) And after year 15 there will remain 1 major adverse effect, 1 moderate adverse impact and 4 minor adverse visual impacts. Four other impacts are agreed as graded.

It is recommended that a series of winter verified views are carried out. These should include the long distance, but significant and described view from the designated National Trust estate at Knightshayes as well as two or more views noted in the document that would more fully represent the visual impact of the proposed development and enable a more informed judgement to be drawn on the extent of the impact envisaged.

Novell Tullett has been asked by Mid Devon Council to provide an appraisal of the landscape proposals that are part of the development application no: 24/00045/MOUT for land at Tidcombe hall in Tiverton. This report work is intended to provide an objective review of the LVIA and landscape proposals submitted by the development team for Tidcombe Hall, in order to support the council's decision making towards determining the planning application.

The application is made on behalf of Tidcombe Holdings LLP, and the site is located at grid Ref: 297452 : 112203, whose address is Tidcombe Hall, Tidcombe Lane, Tiverton, Devon. The application was validated by Mid Devon Council on 8 January 2024.

The outline application is for the erection of up to 100 dwellings to include the conversion of Tidcombe Hall and outbuildings, provision of community growing area, public open space, associated infrastructure, ancillary works and access with all other matters reserved

This is the second application that Novell Tullett has assessed. A previous application made in 2021 was similarly assessed by the practice in June 2021.

This document contains the following

- Executive summary
- Introduction
- Summary of the review
- A description of the site and landscape setting of Tidcombe Hall Tiverton
- A summary of the development proposal
- A commentary on the landscape quality of the development proposal in relation to setting
- A review of the landscape and visual impact provided by the applicants
- Conclusions

This evaluation was carried out by Jane Fowles BA (Hons) DipLA (Hons) CMLI MAUD in December 2024 and January 2025. Jane is a chartered landscape architect with over thirty years' experience in private consultancy, she is the Managing Director and owner of Novell Tullett, a landscape practice based outside Bristol, which she has headed for the last 17 years. Her work has included the production of landscape and townscape assessments as part of rural and urban design consultancy, working with both private and public sector clients.

Further support for local authority planners includes Jane's role as chair of Design West, the design review panel supporting WECA, based in Bristol.

Mid Devon Council has requested that Novell Tullett carry out a review of the landscape impacts that would be caused by the development proposals subject to the application 24/00045/MOUT.

In assessing the potential impacts, the review of the landscape proposals has included reference to the following documents:

- Design and Access Statement : Clifton Emery Design December 2023
- Landscape and Visual Impact Appraisal : Tapestry Urbanism Ltd 30 November 2023
- Landscape and Visual Impact Appraisal : Appendix A - LVIA Methodology
- Tree Survey : Aspect Tree Consultancy May 2023
- Arboricultural Impact Assessment Report : Aspect Tree Consultancy November 2023
- Transport Assessment : AWP November 2023

The applicant's landscape documentation has been reviewed against the following information and guidance:

- Guidelines for Landscape and Visual Impact Assessment (3rd Edition 2013) Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA)
- (TGN) 06/19: Visual Representation of development proposals Landscape Institute
- Mid Devon Landscape Character Assessment 2011
- National Planning Policy Framework December 2024
- Historic England <https://historicengland.org.uk/advice/planning/conservation-areas/>
- Mid Devon Grand Western Canal Conservation Area Appraisal and Management Plan <https://www.middevon.gov.uk/residents/planning/conservation/conservation-areas/conservation-area-appraisals/grand-western-canal-conservation-area-appraisal-and-management-plan/>

A site visit was initially carried out in 2021. During this visit a general assessment of the landscape character and continuity of the setting was made, the footpaths in the local area were walked and visits made to key locations including to Knighthayes Estate. All the viewpoints which form the basis of the appellants' LVIA were visited and assessed for visual and landscape impact, as well as a number of other locations not included in the LVIA.

A further site visit to be carried out in January 2024.

Novell Tullett has proposed that a series of verified views from particular viewpoints especially Knighthayes Church Path, using professional photography to the LI guidelines as stated above, should be provided to the council, as part of the landscape evidence. These photographs should be taken during the winter months, in order to determine whether the LVIA represents the worst case visibility of the site and the proposals.

This is still to be agreed.

THE SITE BOUNDARIES

The site lies to the south east of Tiverton in Mid Devon. It comprises agricultural land rising south towards Warnicombe Lane and abutting Little Tidcombe Farm. It includes both Tidcombe Hall and its remnant parkland. The Grand Western Canal (GWC) forms the northern site edge. The two fields immediately east of Tidcombe Lane are excluded from the red line. Hay Park (a residential district) lies west of the lane. The site extends south to the boundaries of 3 dwellings on Warnicombe Lane and north to the canal edge, east of the immediate setting to Tidcombe Hall.

The land is located outside the settlement boundary of Tiverton and within open countryside. It is partly within an area described within the Mid Devon Local Plan 2013-2033 in policy TIV13 as a contingency site for housing, the rest is unallocated land.

TIDCOMBE HALL SETTING

Tidcombe Hall (undesigned heritage asset) an early 19th century house, shown as Tidcombe Rectory on late 19th century Ordnance Survey map. The hall was much altered in late 20th century. This building is sited right on the edge of Tiverton and would originally have been in countryside, its context is designed and distinct from the wider agricultural countryside beyond it. The whole of the designed curtilage to the Hall, its entrance from Tidcombe Lane and a wide swathe of land to the south of the canal lie within the GWC conservation area.

Tidcombe hall predates the building of the canal, but its setting is enhanced by the offset from the canal alignment which provides the towpath with space and a long view to appreciate the designed components of the house, its walled garden, mature parkland and ornamental trees (albeit towards the rear of the building) While the building is no longer listed it has an important local presence within the conservation area, is a key part of its setting, and is part of the structure of the Tiverton town edge.

Land within the western quadrant of the site, around Tidcombe Hall and its outbuildings, retains some parkland structure with mature trees including *Cedrus libanii*, Yews, Hollies and ornamental cherries. There is a walled garden to the east of the house with orchard trees and other garden species and the site has remnants of a designed landscape, particularly to the drive and front of the house. The existing entrance on Tidcombe Lane, though walled and gated, is modest and relatively understated, it provides a gradual reveal of the house, via a well treed route that discreetly closes the hall frontage from the Lane.

Land to the north of the garden wall (outside the development proposal) comprises a broad meadow also falling north with intermittent mature trees to the canal side. The meadow set back from the canal allows open views from the towpath towards the hall and the walled garden edge.

LITTLE TIDCOMBE FARMHOUSE

Little Tidcombe farmhouse (Grade II listed) is sited on the boundary of the eastern part of the site, outwith the contingency land allocation. The T shaped house faces north and addresses the aspect of the canal. While the farm house may be unassuming in appearance, Heritage England's listing describes the building as:

"Like many early Devon farmhouses, Little Tidcombe Farmhouse has a modest external appearance but

internally retains evidence of an important earlier status as is proven by the very high quality of its hall ceiling. “

To the farmhouse’ rear and east there are several barns and outbuildings which detract from the immediate setting and appearance of the heritage asset. The farm is still a working concern but its use appears to be unrelated to the immediate agricultural land.

The setting of the farmhouse, while not defined explicitly in its listing, or elsewhere, includes the land that it addresses, as well as the approach to it from Warnicombe Lane to the south. This single track route passes through open, arable land, with views to the north towards the Devon hills. Immediate field boundaries include the well vegetated hedgerow that runs north towards the canal and to the south and east mature trees along the Warnicombe Lane that screen views towards nearby buildings at Lower Warnicombe. The appearance, landscape character and setting of the farmhouse is an entirely rural, tranquil and open landscape.

LANDSCAPE SETTING

The site comprises an area of circa 7.09 hectares with the majority of the eastern land currently in agricultural use. There is a good structure of hedgerows and mature trees, while the boundary to the canal is vegetated with some scrub and intermittent mature trees which allow views from the canal towpath into the site, especially towards the eastern site extent.

In terms of elevation the site forms part of lower land, although not the valley bottom. Because the canal is built slightly perched at c. 90 AOD, it is higher than other local valleys such as the land draining from Pool Anthony’s watercourse or the course of the River Lowman. The site includes a lower section fronting the canal (and outside the contingency land) and an equally large part of the land which rises towards Warnicombe Lane essentially forming the mid ground to the southern hillside (the relevance of the junction of the two landscape character types is noted in section below).

The character of relatively regular, rectangular fields with long, north-south boundaries that run up the hillsides is very strong through this landscape (and can still be discerned even within the housing districts that have spread south of Canal Hill). It is this dominant field structure which characterises the site’s landscape and weds it to the rising agricultural land beyond, a pattern that transcends the line of Warnicombe Lane. The landscape character is described within two character types, LCT3E *Lowland plains* into which the majority of the site falls, and LCT3A *upper farmed and wooded valley slopes*. (see chrome-extension://efaidnbmnnnibpcajpcgiclfindmkaj/https://www.middevon.gov.uk/media/103738/chapter_4_part_1_landscape_character_types.pdf for further details)

Aside from Tidcombe Hall, the landscape beyond the defined canal edge is open, populated sparsely by farms, hamlets and some converted and consolidated development probably focused around former farmsteads and cottages. The overall context is rolling countryside, with the steeper slopes to the *Cullompton Rolling Farmland* (landscape character type) to the south. This well wooded landscape is strongly divided by well vegetated hedgerows. The lanes that converge on Tiverton through this landscape, are for the most part narrow, and are also well concealed by hedgerows creating a perception of high, rural tranquillity.

A NOTE ON TOWNSCAPE

In my review of the applicants' landscape information dated June 2021 I made the following comments on townscape:

"The function of the canal here (on the fringe of Tiverton) has come to delineate the boundary of the south eastern town edge, the limit of the built development before the wider countryside beyond. The line of the canal creates a strong finish to the southern extent of the built environment and this is partnered by a similar limit formed by Tidcombe Lane along the eastern boundary of Hay Park. The two mark a clear divide between the town and the open countryside beyond. The blurring of this distinction is made only by Tidcombe Hall" which sets the hall apart as a distinctive landmark in its landscape setting.

The applicants have now included townscape as a receptor within their landscape assessment. This tends to increase the number of factors without negative effects in their assessment, diluting the overall outcome. The proposed development would not affect townscape, it is outside the development area and the main zone of proposed buildings is wholly within open rural land. My point about describing the townscape, was by way of illustrating context and extent. In their assumption in favour of developing the land the applicants have assumed that this development proposal would be part of the extant townscape, it would not, it is clearly outside the development boundary.

The development proposal comprises an outline application for the development of up to 100 dwellings on the open field adjoining Little Tidcombe Farm; additionally the conversion of Tidcombe Hall and its outbuildings; provision of community growing area; public open space; associated infrastructure ancillary works and access with all other matters reserved.

The site area extends to approximately 7.09 hectares. The agricultural land included in the red line area generally comprises two fields, the southernmost forms part of the TIV13 policy allocation that was allocated as a contingency site. To the north, the site borders the Grand Western Canal and towpath, on the other side of which are the residential areas leading off Glebelands Road. To the east the site adjoins agricultural land and the farmstead of Little Tidcombe/ Tidcombe Farm. To the south there are 3 residential properties located off Warnicombe Lane. The agricultural land to the west forms the remainder of the TIV13 allocation and abuts Tidcombe Lane.

The site is accessed via an existing entrance on Tidcombe Lane, there is a secondary access approximately 12 metres south of this. The application seeks outline planning consent with access for approval. The layout, scale, appearance and landscape treatment are reserved matters and not for approval as part of this application.

In terms of the access, it is proposed to widen the existing access from Tidcombe Lane to a width of 5.5m to allow for two way traffic. Visibility splays of 2.4 x 43m are proposed, with a footway proposed across the site frontage and an additional uncontrolled pedestrian crossing to the south on Tidcombe Lane. A proposed traffic regulation order (TRO) on Tidcombe Lane would close the route to vehicular through traffic, except for refuse collection vehicles, buses and emergency vehicles. Access for pedestrians and cycles would be maintained.

The application is supported by an indicative masterplan which indicates the provision of 100 dwellings in total, including:

- conversion of Tidcombe Hall and outbuildings (9 dwellings)
- 8 dwellings to be erected within the grounds to the east of Tidcombe Hall and
- erection of 83 dwellings in the wider site area.

also proposed are:

- 28% affordable dwellings
- 3.75 ha public open space to include a 1.91 ha parkland, community growing areas and a SUDs scheme adjacent to the canal, designed to buffer the development

According to the committee report on the application (dated 08 01 2024) the scale, appearance, layout and landscaping are reserved matters the application sets out that the dwellings could be a mix of 1-4 bed properties, of detached, semi-detached and terrace form, limited to two storey in height. The indicative plans show 143 car parking spaces with a further 40 spaces in garages/carports. The proposals aim for houses to be designed with maximum solar efficiency and low energy use, to be explored at detailed design stage, subject to scheme viability.

There are two main strands to a landscape evaluation of the development proposals on any local area. The first is landscape impact and the second is visual impact. The landscape impact is tied up with the concept of setting, since landscape, or open space, generally comprises a large part of what constitutes a setting. Setting is described in the National Planning Policy Framework (NPPF) as:

“the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”

(NPPF Annex 2: Glossary)

In order to understand the value, quality and contribution that the landscape setting makes to the heritage assets of the immediate area of the development proposals (which includes Little Tidcombe Farmhouse, Tidcombe bridge) along with the conservation area of the Grand Western Canal (GWC) there is recourse to the Grand Western Canal Conservation Area Assessment and Management Plan (CAAMP).

A conservation area (as defined by English Heritage) is “a place of special architectural and historic interest” - in other words the features that make it unique and distinctive are what are conserved by the designation.

With regard to the GWC the CAAMP describes the canal as:

“an historic route through the rural landscape, which provides opportunities for views across the landscape. Tidcombe Hall is a prominent building that has historically been appreciable from the canal and the views across the surrounding agricultural land provides a strong visual relationship.”

CAAMP page 25

and at page 54 the CAAMP describes the nature of the heritage assets of Tidcombe Bridge (listed grade II)

“The bridges are important surviving features which contribute to the special architectural and historic interest of the Conservation Area.”

CAAMP page 54

and the non-designated asset of Tidcombe Hall as:

“Tidcombe Hall is a large house to the south of the Grand Western Canal, historic maps show it is on the site of St. Lawrence’s Chapel. It is a prominent building and makes an important contribution to the architectural and historic special interest of the Conservation Area. The building is highly distinctive within the rural landscape.

CAAMP page 28

and

“Tidcombe Hall includes a large boundary wall of brick with supporting buttresses. This wall can be appreciated from along the towpath. Much of the boundary to the towpath is that of mature trees and hedgerows which reinforces the rural character of the Conservation Area”

CAAMP page 30

The composition of the bridge, the hall and the conserved landscape of the canal is described as:

“Adjacent to Tidcombe Bridge and Tidcombe Hall, views in an easterly direction across the rural landscape are appreciable. Tidcombe Hall is a prominent building set within the rural landscape and views are appreciable across the undeveloped setting of the Conservation Area, providing the travelling observer with an experience of the changing historic character (View 2).

CAAMP page 54

The Conservation Area Appraisal goes on to describe how the character of the landscape can be appreciated from Warnicombe Lane:

“To the southeast of the canal from Tiverton, views across the agrarian landscape can be appreciated and this includes views of Tidcombe Hall, a prominent building and historically located in an isolated position. The pastoral character of the setting of the Conservation Area can also be appreciated from Warnicombe Lane to the south, which is of an elevated position. To the north of Tidcombe Hall and to the west, the area has altered from a rural undeveloped landscape to residential, thus the open landscape character to the east and south remains an important link to the rural setting of the Conservation Area.

CAAMP page 60

and

“the canal across the agrarian landscape to settlements such as The Parish Church of St Andrew, Halberton. Historic farmsteads such as Tidcombe Farm and Battens Farm set within the rural landscape are positive elements within the Conservation Area’s setting.”

CAAMP page 60

Conservation Area Appraisals are drawn up by Councils to *describe the special architectural and historic interest of the area and seek to conserve those positive elements identified*. They also seek to describe how the setting of a conserved asset is perceived within the local area. In the quotes above the rurality of the scene around Tidcombe, the separate identity of the hall in the landscape, the longer views to Warnicombe Lane and the links to the agrarian landscape of Devon are an integral part of the value of the heritage assets and the way that the canal runs through this open landscape. The document makes reference to the loss of the openness further to the west where the rural nature of the landscape has replaced by suburban housing development at Hay Park. The proximity to the already degraded setting of the conservation area further to the west provides an example of how easily the structure and setting of special and limited assets can be lost.

While management plans provide guidance to people on how positive change and good quality design can preserve or enhance the character or appearance of the area they also set out the fundamental characteristics which contribute to the value of the asset.

Furthermore, there is a statutory obligation on decision-makers to have “special regard to the desirability of preserving listed buildings and their settings. With respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.” Planning (Listed Buildings and Conservation Areas) Act 1990 Sections 16, 66 and 72

In practical terms, this means that land within the ‘setting’ of heritage assets is given due consideration within the decision-making process. The latest revision (December 2024) of the National Planning Policy

Framework (NPPF) under paragraph 219 there is provision that:

“Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.”

NPPF 2024 para 219

Turning to the development proposal in relation to the above mentioned guidance and statutory obligations the salient question is ***does the proposed development enhance or better reveal the significance of the heritage assets, and does it preserve those elements of the setting that make a positive contribution to the asset?***

The design proposals respond in part to an understanding of this character. A generous offset to the canal, while enabling access to the built areas, has been designed with a SUDs and “parkland” character to the open space adjoining the GWC Conservation Area, albeit this still constitutes development and a change of use from the agricultural land that currently exists.. The immediate impact on the demesne of Tidcombe hall has also been reduced with a similar arrangement of buildings, but a more generous and formal landscape space to the front of the hall which also reduces the proximity of the access road to the building frontage. The character of the rear wall and its relationship with the northern meadow between it and the canal has also been better understood and left intact. And the extent of development has been reduced considerably since the application in 2022.

However, the proposed access would still have a detrimental impact on the character of the entrance, the setting of the conservation area and the listed assets. It is shown as a 5.5 metres wide, with conventional highway alignment which does not respect either the site sensitivity or the discreet nature of the original drive. The loss of trees has been gauged (by the Arboricultural consultants Aspect) as low impact, but the overall number of trees lost in the context of heritage sensitivity does not appear to have been factored into the assessment. The effect on Tidcombe Lane, as part of the setting in question, will be considerable. With the construction of a new footway, the enlarged entrance and a separate pedestrian access route the number of trees to be removed will have a marked impact on the amenity and character of the lane. Albeit there is an existing consent to remove the two Beech trees which are affecting the structural integrity of the wall, the loss of smaller understorey trees that are characteristic of Victorian style planting has been underestimated.

The wider part of the proposed housing development has now been reduced to occupy the field that immediately neighbours Little Tidcombe farmhouse, leaving the field (in the 2022 application) to the east, as open land, but with a resultant rigidly aligned housing layout which is characterised by a series of cul-de-sacs. The suburban arrangement of the design is epitomised by these cul-de-sacs that will result in poor permeability and a series of turning heads at the end of the streets. The regularity of the development pattern is at odds with the prevailing character of local development of scattered farms, separate larger houses and cottages that is generally prevalent in this area. The effect on Little Tidcombe farmhouse setting is difficult to assess without visiting the private land, but since tranquility is part of setting, the transition from rural arable land to one populated by housing, car parking and the comings and goings of a residential population in close proximity to the farm is likely to have a detrimental effect.

The reduced and consolidated nature of the development has another more marked adverse impact on the location, that of greater penetration into open countryside and more obvious separation from the urban edge. Hitherto the pronounced edge to Tiverton caused by the canal alignment and Tidcombe Lane has formed a strongly-defined boundary to the town. As the land within the development field is rising towards Warnicombe lane it offers up a prominent view of the development isolated within other agricultural land. This field is particularly visible within the local area, from the towpath and from other local footpaths. It is also discernible from Knightshayes (see further below).

REVIEW OF THE LANDSCAPE ASSESSMENT

The landscape and visual impact assessment (LVIA) provided by Tapestry Urbanism Ltd, as part of the applicant team, is the subject of this appraisal. The foregoing comments on setting have been touched on in the LVIA, but the judgements in relation to setting and rural character appear to have been downplayed. While assessment of landscape is to some extent subjective, the methodology set out by Tapestry appears to be relatively robust in content. In generating the revised judgements that are set out below, I have used the matrices provided within the applicants' methodology. In evaluating the impacts described in the LVIA there are incidences where, in my opinion, the effect of the potential development has been downplayed. This may have arisen as a result of wrongly identifying the receptor, or misunderstanding the criteria which give it value in the first place. In addition to this, there appears to be a relatively limited understanding of the scenic and intrinsic value of open agricultural land, which once developed is evidentially and irreplaceably lost.

The LVIA judges the series of landscape receptors as follows:

1. County level landscape character area
2. Site landscape character area
3. Local townscape character
4. Site landscape value
5. Setting landscape value
6. Tidcombe Hall and its setting
7. Topography geology and soils
8. Blue infrastructure
9. Trees and vegetation
10. Grand Western canal conservation area
11. Grand Western canal local nature reserve

Of the above 10 identified receptors the following 7 value judgements are questioned and a rationale put forward for an alternative grading which more accurately reflects the likely landscape impact in each case:

3 LC3 Local townscape character

In this context the local townscape character is arguably irrelevant. The site (as shown by the red line) is clearly outside Tiverton development area and separated by a strongly defensible boundary. The townscape may neighbour, but does not actually adjoin the site. To include this element (which is generally of poor quality) tends to dilute the overall judgements of sensitivity and should be omitted from the assessment.

4 LV1 Site landscape value

The GLVIA3 provides a series of aspects to value against which the LVIA judges the site landscape. Using these factors the receptor value has scored from very low to medium value. Of the topics considered the following comments on the judgements given are pertinent:

- Perceptual - wildness and tranquility - given the open and undeveloped nature of the majority of the land (especially in proximity to the town's edge) the value of its openness and tranquility is a key factor. The assessment of tranquility in particular appears to have been underplayed as the land does

have at least a moderate degree of tranquility - it is a sufficiently large parcel of land in the centre of other arable land, and it relates to a much wider open landscape. The guidance in relation to reversibility is also important here - as the change in the landscape will be permanent.

- Moving to the magnitude of change to the value of the landscape it is clear that there would be an irreversible loss of agricultural land. Under p 60 which includes the final comments on magnitude of effect, the change in use is judged to have a low magnitude indicating that openness and reversibility have not been properly evaluated. The final evaluation of minor neutral is clearly underplaying what would be a removal of open land from the farming landscape. The resultant magnitude of effect would more properly be judged as **major adverse**.

With a receptor value of **high/medium** and a **high** susceptibility to change, the sensitivity of the receptor is judged to be **High**. Magnitude of change is judged to be **medium** therefore the overall effect is **Moderate adverse**.

5 LV2 Setting Landscape Value

The setting, as discussed above, extends across the majority of the site - either because of Little Tidcombe Farm, Tidcombe Hall, Tidcombe Bridge or the GWC Conservation Area. As a consequence of the layering of these multiple assets the value of the setting should be judged as high. This is a rural area, characterised by an estate with a locally listed building outside the edge of the town. The sensitivity of the receptor to change is therefore high not low as judged in the LVIA.

With a receptor value of **high** and a **high** susceptibility to change the sensitivity of the receptor is judged to be **Very High**.

The landscape setting to the edge of the town will be changed substantially. This is not an insignificant change as the introduction of a suburban housing development into agricultural land with its associated noise, light pollution, traffic movements as well as the physical change from open land to built environment will be considerable. This can only be described as a detrimental change not a neutral one, whose significance of effect is likely to be **moderate adverse**.

The magnitude of effect on the setting is **medium**, therefore the overall effect is **major/moderate adverse**.

6 LF1 Tidcombe Hall and its setting

Agree that the setting is of high to medium sensitivity.

However, the judgement on overall landscape impact has been graded as neutral, which does not account for the material and major changes to the drive to the hall; the highways aligned opening that will completely change the character of the approach to the building; and changes to the character and quality of the route to the hall itself, with all the traffic necessary for a 100 house development designed to pass its front door. There will be changes to the setting on all sides and the southern (originally designed) outlook from the building will be that of a suburban housing development, rather than a rural, agricultural landscape. Albeit there may be beneficial upgrades to the management of the walled garden the overall loss of amenity and impact on the setting of the locally listed heritage asset is likely to be considerable, not neutral. This should better be described as **moderate adverse**.

With a receptor value of **high/medium** and a **medium** susceptibility to change, the sensitivity of the

receptor is judged to be **Medium**. Magnitude of change is judged to be **medium** therefore the overall effect is **Moderate adverse**.

7 LF2 Topography, geology and soils

The topography, geology and soils receptor is judged to have a medium - high sensitivity.

While the topography of the field and development areas within the walled garden and the access route etc is unlikely to be affected by changing the levels unduly, largely due to a relatively even gradient across the site in the northern quadrant at least, this is not the case for the effect on soil. Building 100 houses, with highway access, hardstandings, driveways etc will not have a very low or negligible effect on soils. On the contrary, the soil in the field especially will be completely destroyed by the construction phase of the works and building over a high proportion of the land will remove any viability or soil quality. The magnitude of effect on soils should better be described as **moderate** to **major adverse**.

The value of the receptor is agreed as **medium**. Susceptibility to change is **high** and the sensitivity is therefore **high/medium**. Magnitude of change is judged to be **medium** therefore the overall effect is **Moderate adverse**.

8 and 9 are agreed as graded

10 LD1 Grand Western Canal Conservation Area

The sensitivity of the receptor is agreed to be medium.

However, the magnitude of effect has been assessed as **very low** and the resultant significance of effect is **negligible**. This grading has downgraded the value of the conservation area and its significance in the local area. One of the key attributes of the conservation area is its relationship with open countryside - as described in the CA appraisal and quoted above in the section on setting. The proximity of the 100 house development to the conservation area means that there will be a marked effect on its setting which can not realistically be judged as very low. This should better be described as **moderate adverse** notwithstanding the landscape changes which are envisaged to the proximity of the canal itself.

Receptor value **medium**, susceptibility **high/medium**, landscape sensitivity **medium**. Magnitude of change is judged to be **medium**, therefore the overall effect is **Moderate adverse**.

11 LD2 GWC nature reserve

The sensitivity of the receptor is agreed to be medium.

In this instance it would be more accurate to say that there will be an enhancement of the habitat adjoining the nature reserve which will increase opportunities for wildlife along the canal. A larger species pool and greater habitat area as envisaged in the landscape masterplan, immediately adjoining will constitute an improvement to the nature reserve. The grading overall should better be described as **moderate positive**.

Receptor value medium, susceptibility high, landscape sensitivity high/medium. Magnitude of change is judged to be **medium**, therefore the overall effect is **Moderate positive**.

The table below gives a summary of Novell Tullett's judgements on landscape impacts adjacent to those of the applicant for comparison:

	TIDCOMBE HALL TIVERTON	Landscape sensitivity matrix			
		Tapestry grading Sensitivity	Novell Tullett grading sensitivity	Tapestry grading Assessment of landscape effect	Novell Tullett grading of landscape effect
	Landscape Character				
1	LC1 : County Level Landscape Character Area / Type (DCA)	Low		Negligible	Negligible
2	LC2 : Site Landscape Character Area	High		Major Adverse	Major Adverse
3	LC3 : Local Townscape Character	Very Low		Minor positive	irrelevant
	Landscape Value				
4	LV1 : Site Landscape Value	Medium		Neutral	Moderate adverse
5	LV2 : Setting Landscape Value	Medium	Very High	Negligible	Moderate adverse
6	LF1 : Tidcombe Hall and its setting	High to Medium	Medium	Neutral	Moderate adverse
	Landscape features				
7	LF2 : Topography, Geology & Soils	Medium	High/medium	Negligible	Moderate adverse
8	LF3 : Blue Infrastructure	Medium		Minor Positive	Minor Positive
9	LF4 : Trees & Vegetation	High		Moderate positive	Moderate positive
	Landscape designations				
10	LD1 : Grand Western Canal Conservation Area (CA)	Medium	Medium	Negligible	Moderate adverse
11	LD2 : Grand Western Canal Local Nature Reserve (LNR)	Medium	High/medium	Negligible	Moderate positive

This aggregates to 6 significant adverse judgements, (5 more than were set out in the applicants' assessment) 2 moderately positive, 1 assessment which is not relevant to the site, and 1 negligible assessment.

REVIEW OF THE VISUAL ASSESSMENT INTRODUCTION

The visual assessment provided by the applicants examines 18 views from between 1 - 4 kilometre radius of the site. A review of the methodology of the visual assessment reveals a number of departures from the GLVIA3 guidance :

The photographs are taken in both summer and winter situations, so there is a lack of consistency across the work. This is particularly relevant in relation to some of the long distance views because of the potential for screening afforded by the extent of summer vegetation.

In addition, there are the following errors:

- The viewpoint location plan does not accurately locate the photograph locations.
- All the viewpoints seem to have slipped, but in addition some of them are wrongly attributed in the key.
- Viewpoint 18 is missing from the location plan altogether
- The extent of the site is generally shown as being the area proposed to be built on, whereas the development area includes the field within the setting of the GWC conservation area. This reduction in the site area, (notwithstanding the proposed soft scheme that is proposed to this zone) does not genuinely reflect the change from agricultural use to a managed parkland landscape. It could be argued that this change is beneficial, but it is nonetheless a change to the character of the land.
- A number of figures are not actually titled at all, this includes the Topography map and the two Landscape character area plans, national and local;

The aim of the visualisation, within the locations from the photographs presented, is to represent the context and outline or extent of development and/or key features, particularly those protected ones. Where no visual relationship between the viewpoint and the development site can be shown, the assessment of sensitivity is no longer relevant. In these instances I have discounted the viewpoints and noted that no view of the development site is available. However, where a local or similar view would have afforded a view, this is of some relevance to the assessment because it tends to suggest that the baseline evaluation of the view locations has not been sufficiently rigorous. While the guidance sets out the fact that viewpoints are *representative* rather than being *exhaustive* where a location adjoining or close to the viewpoint selected does present a view it is a shortcoming of the assessment if this has not been identified and evaluated. This is a factor in views No 4 and 18.

ASSESSMENT OF THE VIEWPOINTS

View 1 Knightshayes Court

It is agreed that the site lies to the west of the viewpoint and is screened by vegetation within the site. It is agreed that there is no visual impact from this location.

View 2 Knightshayes Estate

This view is of a distance of c. 4 km from the site, and it is not clear whether the house indicated in the view as Tidcombe Hall is the hall or possibly a group of houses on Warnicombe Lane. If the latter is true, this indicates that the view of the site is likely to be less than indicated as the site lies lower in the valley and would be screened by mature vegetation in the foreground. The extent of Hay Park as it rises up

towards Warnicombe Plantation is clearly visible and the buildings indicated as Tidcombe Hall can be located relative to the Hay Park settlement. It is agreed that there is no visual impact from this location.

View 3 Chevithorne War Memorial

It is agreed that the site extent is correct and that there is no visual impact from this location.

View 4 Craze Lowman

It is agreed that there is no visual impact from this location.

However if the assessor had walked north west, up footpath 20 towards Peadhill Farm, only moments away, there would have most likely have been a view towards the site. This representative viewpoint from FP 20 should have been assessed.

View 5 Uplowman Road / Blundells Road

It is agreed that this view affords a low value view and that there is low visibility because of the distance to the site, the relative elevation and the intervening vegetation. It is agreed that there is no significant visual impact from this location.

View 6 Tiverton Bridge and car park

It is agreed that this is an oblique view which is largely screened by trees and has therefore a very low value and low visibility. It is agreed that there is no visual impact from this location.

View 7 Pool Anthony

Although closer to the site than Tiverton Bridge, the reduction in elevation and dense intervening vegetation along the former railway line makes any view of the site difficult, especially in the summer. It is agreed that there is no visual impact from this location.

View 8 Rowridge

It is agreed that there would be no visual impact from this viewpoint from where trees obscure the view.

View 9 Thurlscombe Cross

It is agreed that there is no visual impact from this location because of mature intervening vegetation.

View 10 Newtes Hill Warnicombe Plantation (Tiverton FP31)

This is a view in open countryside on a public footpath. The foreground of the view is that of open fields with mature trees and hedgerows. In the mid ground the extent of Tiverton is visible and the open land below Knightshayes rising up the valley side forms the backdrop to the view. Receptors on the footpath will be aware of the countryside context and be surveying the edge of the town from this good vantage point. The value of the view is more accurately described as medium with the susceptibility also judged as medium. This would lead to a sensitivity assessment of medium as the change to the view would be permanent, a clear incursion into open countryside and would be clearly visible from much of the footpath as it descends towards the town. The assessment would therefore better reflect the judgements given in the red box below.

Receptor Groups	Walkers on PROW
Assessment of Value	Medium to Low
Assessment of Susceptibility	Medium to Low
Assessment of Sensitivity	Low

Walkers on PROW
Medium
Medium
Medium

View 11 Lime Tree Mead

The assessment describes the view as of low value, and although the site is visible it is in context of other suburban development, and buffered by trees and buildings in the foreground. This is agreed.

View 12 Knightshayes Church Path

A verified view from this vantage point in the winter months is essential because of the potential for a high degree of visibility in extending the built development into open countryside east of Hay Park and around Tidcombe farm. The assessment relies on the view being blurred by vegetation. A view taken during the winter months would more accurately reflect the worst case and then the judgement of impact could be better relied on than that given in the assessment.

Receptor Groups	Visitors to designated heritage asset
Assessment of Value	High
Assessment of Susceptibility	Medium to Low
Assessment of Sensitivity	Medium

ditto
High
High
Very High

View 13 Grand Western Towpath (view 1 oblique view westward from 2km)

The assessment for this viewpoint is agreed as follows:

Receptor Groups	Walkers on PROW
Assessment of Value	High to Medium
Assessment of Susceptibility	Low
Assessment of Sensitivity	Medium

View 14 Blundells Conservation Area

The assessment provides that no view is afforded from this location, given for information only. Agreed.

View 15 GWC towpath (view 2 neighbouring field view)

The LVIA methodology sets out a series of criteria which establish what kind of receptor (person experiencing the viewpoint) is likely to be in the locality and grades them accordingly. The receptors along the towpath are within a Conservation Area, walking for, most likely, recreation, or on a canal boat / barge and will be enjoying the rural outlook.

Within the category “high grade” the receptors are described as:

“residents or visitors who are engaged in outdoor recreation, including the use of public rights of

way, whose attention or interest is likely to be focused on the landscape and on particular views.”

Since the outlook from the towpath is hedged or fenced on its northern side to seclude adjoining properties, the focus is largely to the south, and either to the east or west dependent on the direction of travel, the open landscape views are therefore the clear focus of the receptor. The grading of the receptor is therefore **high** as described by the applicants’ methodology. If this is combined with “the degree to which the landscape in the view may accommodate the influence of the Proposed Development” this also points to a **high** assessment, since the change from rural and open land to a suburban development is permanent and with high clarity in views experienced by walkers (with time to absorb the view) from the towpath.

To make the assessment consistently accurate a similar rationale should be adopted for the judgement of the view in this instance. With the adjustments to the judgements as shown in the red box.

Receptor Groups	Walkers on PROW	Walkers on PROW
Assessment of Value	Medium	High to medium
Assessment of Susceptibility	High to Medium	High
Assessment of Sensitivity	Medium	High

View 16 GWC towpath (view 3 Tidcombe Hall setting)

Receptor Groups	Walkers on PROW
Assessment of Value	Medium
Assessment of Susceptibility	High to Medium
Assessment of Sensitivity	Medium

The location of this view within the Conservation Area shows the setting of Tidcombe Hall, above the canal and the extent of the walled garden, the canalside trees and the meadow beyond. From this location the wider site is obscured but the visual relationship of the Hall, as part of the conservation area setting is clearly shown. The assessment of sensitivity is agreed.

View 17 GWC towpath (view 4 west to Tidcombe Bridge)

In this view Tidcombe Hall, adjoined by a distinctive (protected) Cedar tree, along with the sloping open pasture of the CA of the GW canal and the towpath itself lead the eye towards the listed bridge. These elements form the composition of the view. The glimpsed view of Hay Park adds some built elements in the background of the view. The grouping of buildings within the park wall of the hall, which the development proposals would retain, tends to indicate that a small change within this composition is acceptable as the structure of the view would be unaffected. The overall judgement of sensitivity is therefore agreed as below.

Receptor Groups	Walkers on PROW
Assessment of Value	Medium
Assessment of Susceptibility	High to Medium
Assessment of Sensitivity	Medium

View 18 Tidcombe Lane/Tidcombe Bridge

The assessment of sensitivity from this viewpoint is disputed. The bridge (a listed structure) has a national designation which is of higher value than the conservation area (a local designation), a subtle distinction. Therefore one could argue that using the applicants' methodology the value of the receptor is high-medium in this instance. Furthermore, the viewpoint is more explicitly of the rural meadow in the CA in front of the hall. This means that this viewpoint is much less able to accommodate development which could potentially be seen above and between the trees in the mid ground. The grading of the view is therefore more accurately represented as follows:

Receptor Groups	Walkers	Walkers on listed structure
Assessment of Value	Medium	High-medium
Assessment of Susceptibility	Medium	High
Assessment of Sensitivity	Medium	High

However, in my analysis of the applicants' information of 2022, I observed that there was a lack of assessment of Tidcombe Lane especially at the site entrance. While this viewpoint may be just outside the Conservation Area it remains part of the setting of the Conservation Area and the listed Tidcombe Bridge. This remains an absence in the information submitted.

Had the photographs been taken in that location, it would have indicated that the current circumstances are of a discrete and carefully controlled absence of view into the site. The proposals would create a 5 metre wide entrance and site road leading to a completely different arrangement at the front of the house. This would create a very different approach to the house and provide a marked difference to the character of the setting, the house's visibility, privacy and seclusion. To overlook the analysis of this change is a major omission in the assessment and indicates a downgrading of the extent of visual impact.

EVALUATION OF THE OVERALL VISUAL IMPACT OF THE DEVELOPMENT PROPOSALS

This part of the report evaluates the way that the extent of views have been graded in the immediate, short and long term (after 15 years). While visibility of the development site is part of this grading, the significance of effect is moderated by the sensitivity grading of the receptor in each case. And as some of the gradings of the receptor have been (in my view) optimistically lower than that pertaining to a receptor in a conservation area, or within the setting of heritage assets, the sensitivity of those identified has in some instances not been accurately judged.

It is worth noting that the LVIA states that the site is well contained, this is not true. There are high level views into the site from either side of the valley, as well as near views which are clearly apparent from the GWC towpath. The assessment also states that the site is in the valley bottom, whereas in reality the canal is perched part way up the valley side and the hillside (that constitutes part of the proposed site) is situated on rising ground within the mid ground of the valley side.

Views without any visibility of the site, as noted above are not included in this evaluation. Those evaluated further comprise:

View 10 Newtes Hill Warnicombe Plantation (Tiverton FP31)

View 11 Lime Tree Mead

View 12 Knightshayes Church Path

View 13 Grand Western Towpath (view 1 oblique view westward)

View 15 GWC towpath (view 2 neighbouring field view)

View 16 GWC towpath (view 3 Tidcombe Hall setting)

View 17 GWC towpath (view 4 west to Tidcombe Bridge)

View 18 Tidcombe Lane/Tidcombe Bridge

A table showing the summary of the revised judgements against those judged by the applicants is shown below. The resultant visual impacts accord with 10 of the judgements given in the study by the applicants. Where the judgements differ they are coloured pink.

Viewpoint	Receptor Value	Receptor Susceptibility	Grading of Sensitivity	Magnitude of Effect	Significance Year 0	Significance year 15
10 Newtes Hill	Medium - low	Medium -low	Low	medium	Minor Neutral	Negligible
NT assessment	Medium	Medium	Medium	Medium	Moderate adverse	Moderate adverse
11 Lime Tree Mead	Low	Low	Very Low	Very low	Negligible	Negligible
NT assessment			agreed			agreed
12 Knightshayes - Church Path	High	Medium - low	MEDIUM	Very low	Negligible	Negligible
NT assessment	High	High	Very high	Low	Moderate adverse	Minor adverse
13 Grand Western Canal Towpath	High - medium	Low	Medium	Very low	Negligible	negligible
NT assessment	High - medium	Low	Medium	Very low	Minor negligible	negligible
15 Grand Western Canal Towpath	Medium	Medium	Medium	Medium	Moderate adverse	Minor neutral
NT assessment	High to medium	High	High	High	Major adverse	Major adverse
16 Grand Western Canal Towpath	Medium	High to medium	Medium	Medium	Moderate adverse	Minor neutral
NT assessment	Medium	High to medium	Medium	Medium	Moderate adverse	Minor adverse
17 Grand Western Canal Towpath	Medium	High to medium	Medium	Low	Minor adverse	negligible
NT assessment	Medium	High to medium	Medium	Low	Minor adverse	Minor adverse
18 Tidcombe Lane / Tidcombe Bridge	Medium	Medium	Medium	Medium	Moderate adverse	Minor neutral
NT assessment	High-medium	high	high	Medium	Moderate adverse	Minor adverse

Of the remaining 8 viewpoints my judgement is that at day one there will be there will be 1 major adverse effect, 4 moderate adverse impacts and 1 minor adverse and 1 minor negligible effect. And after year 15 there will remain 1 major adverse effect, 1 moderate adverse impact and 4 minor adverse visual impacts.

The outline development proposal 24/00045/MOUT for land at Tidcombe hall in Tiverton located at grid reference: 297452 : 112203, comprises an application for the erection of up to 100 dwellings to include the conversion of Tidcombe Hall and its outbuildings, provision of community growing area, public open space, associated infrastructure, ancillary works and access with all other matters reserved.

This report is intended to provide an objective review of the applicants' LVIA in order to support Mid Devon Council's decision making towards determining the planning application.

As part of the review of the information submitted, and as a precursor to reevaluating the findings of the LVIA, a series of quotes have been included that refer to the National Planning Policy Guidance; definitions of the term **setting**; the reasons for designation of the conservation area and the value of designated and locally listed heritage assets at this site. These comments are relevant to assist in an understanding of place and to describe the status quo of Tiverton's development boundary, and the character and quality at the interface of townscape and countryside at this location.

The clear breaching of the development boundary which would be achieved if the proposed development were to go ahead is manifest in the masterplan which shows a suburban development surrounded by open land on all sites, linked only by its access route to a lane along the town's boundary. The redevelopment of the hall and its environs would change the character of a local heritage asset.

The applicants' LVIA has been reassessed, using the methodology and matrices provided to evaluate the potential impacts on both landscape and visual resources. The re-examined impacts on landscape resources result in 6 significant adverse judgements, (5 more than were set out in the applicants' assessment) 2 moderately positive judgements, 1 assessment that is not relevant to the site, and 1 negligible assessment.

On visual impact a total of 18 viewpoints were evaluated and of these the potential visual impact of 10 viewpoints was agreed as indicated in the LVIA. Of the remaining 8 viewpoints the re-examined impacts on visual resources indicate that at day one there will be 1 major adverse effect, 4 moderate adverse impacts and 1 minor adverse and 1 minor negligible effect. (the impact on Lime tee Mead is agreed.) And after year 15 there will remain 1 major adverse effect, 1 moderate adverse impact and 4 minor adverse visual impacts. Four other impacts are agreed as graded.

It is recommended that a series of winter verified views are carried out. These should include the long distance, but significant and described view from the designated National Trust estate at Knightshayes as well as two or more views noted in the document that would more fully represent the local visual impact of the proposed development.

