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LITTLE TIDCOMBE FARM AND TIDCOMBE HALL

TIVERTON DEVON

**Review of Landscape and Visual Impact Assessment relating to land at Tidcombe Hall and
Little Tidcombe Farmhouse, contingency housing allocation, and unallocated land**

Planning reference number 20/01174/MOUT

For Mid Devon District Council

7 June 2021

Revision A

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LAND AT LITTLE TIDCOMBE FARM AND TIDCOMBE HALL TIVERTON DEVON | REVIEW OF SUBMITTED LVIA

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PREFACE

This evaluation was carried out by Jane Fowles BA (Hons) DipLA (Hons) CMLI MAUD in May/June 2021.

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 just outside Bristol, which she has headed for the last 14 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. Jane is also a Design Council expert.

The work was commissioned by Mid Devon District Council to provide an objective review of the LVIA submitted by the development team working on proposals for Little Tidcombe Farm and Tidcombe Hall, in order to support the council's decision making towards determining planning application reference number 20/01174/MOUT.

1 INTRODUCTION

This review concentrates on evaluating the landscape and visual aspects of the LVIA prepared by Urben Studio for Little Tidcombe Farmhouse and Tidcombe Hall Tiverton – the development site in question. Because of the time constraints in preparing the review the planning policy context to the site context has not been evaluated and should be reviewed by the planning officer to ensure that accurate reference has been made to extant policy as required as part of the baseline to the study.

1.1 Location and land structure

The development proposal, the subject of the LVIA, is intended for a site that lies to the south east of Tiverton in Mid Devon, shown within the Mid Devon Local Plan 2013-2033 partially as a contingency housing site. This contingency housing area comprises c. half the site, the rest is unallocated land. The site lies to the south of the Grand Western Canal (GWC), and abuts housing on the western side of Tidcombe Lane known as Hay Park. The site extends south towards Warnicombe Lane and east to a field boundary which aligns with the eastern edge of existing housing north of the canal.

The site comprises an area of circa 12.08 hectares which generally falls from Warnicombe Lane north towards the canal. The majority of the eastern land is currently in agricultural use with a good structure of hedgerows and mature trees, in the centre of which is Little Tidcombe Farm (Grade II listed, this building is not included in the development proposal site area). 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.

Land within the western quadrant around Tidcombe Hall 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. Land to the north of the garden wall (outside the development proposal) comprises a broad meadow also falling north with intermittent mature trees on with the canal side. The hall and its setting lie within the GWC Conservation Area. The meadow set back from the canal allows open views from the towpath towards the hall and the walled garden edge.

1.2 Development proposal

The LVIA is provided to support an outline planning application for largely residential development. The application is for up to 170 units which includes the conversion of Tidcombe hall and its outbuildings, a shop, café and other infrastructure such as parking. The external amenity proposed includes allotments, orchard and public open space with the majority of hedgerows and trees retained, and new woodland.

The Design and Access Statement includes evaluation of the ecological character of the site and the document sets out a rationale for the distribution of built and open areas intended to protect the existing habitats, as well as to provide amenity open space, screening and landscape structure to the

proposed development. Aside from the area around Tidcombe Hall, the open land within the GWC Conservation Area would be retained as open space.

The strategy for the development indicates the following distribution of built elements:

- Site access from Tidcombe Lane
- Conversion of Tidcombe Hall to provide accommodation and within the walled garden some medium density housing along with facilities such as a farm shop/café and community growing project
- East of the hall environs, an open landscape zone with balancing ponds/suds provision to form a margin to the southern canal side (within GWC Conservation Area)
- South and east of the hall and separated by an existing field boundary, an area of high density housing that becomes lower density towards Warnicombe Lane is proposed
- East of this a landscape buffer zone to Little Tidcombe Farm
- South of the farm, and running up to the field and garden boundaries of properties on Warnicombe Lane, a medium density housing area
- Within the eastern site boundary (of retained hedgerow and additional woodland) a medium and lower density housing development

The development proposal was submitted with a series of supporting documents, among these layouts showing trees to be lost as part of the proposal, the Design and Access Statement and transport proposals which have also been studied in order to gain insights into the potential effect of the development on the wider landscape. The Landscape and Visual Impact Assessment (LVIA) forms the main focus of this review.

2 STRUCTURE OF THE REVIEW

The document that comprises the Tidcombe Hall LVIA sets out the sections and structure that generally comprises such a study. Evaluating the relevance, accuracy and veracity of the information given is the purpose of this report to support Mid Devon's planning process. By taking each main section of the study in turn and scrutinising the detail, comments are included below on its content, its rigour in relation to both applying the acknowledged Landscape Institute guidance and its own stated methodology.

The development proposal is an outline planning application, and the LVIA makes reference to this by saying that the scheme shown in the DAS is not necessarily the final scheme. This appears to be the rationale behind the discursive approach adopted for the majority of the landscape assessment. However this approach to the study is only valid to a certain point. When omissions or inaccuracies have been encountered the veracity of the overall approach is called into question.

In order to give examples of the sort of elements that should have been assessed, comments within this report highlight topics which could usefully have been more robustly examined. To illustrate the value of more robust process some example assessment (given in tabular form) has been provided especially where there are omissions in the text, to show how the information could have been more accurately and logically presented. This would have assisted comprehension of the judgements made and importantly would have better illustrated the potential effect of the development on the site in question. Within the confines of the time available an entirely new landscape and visual assessment has not been carried out, and that is not the purpose of this document.

In summary, the tables given show how the assessment process would have been better carried out, along with comments on the elements that have been missed or overlooked in the process of the review.

Within the visual assessment there are a majority of viewpoints from where there would be no significant visual impact and on these agreement is noted. Where other views nearby would have had a clearer view of the development these have also been suggested.

The overall aim of this document is to draw out a fuller description of the potential impact of the proposed development on the site in question, without doing the work for the development team.

2.1 Methodology

The methodology described in section 3 of the LVIA appears to cover the required topics through both desk study and site visits to evaluate the site context. The methodology describes the assessment process and provides a matrix against which the landscape sensitivity can be measured. This is referred to in 3.24 and a description of what factors would enable a particular landscape to accommodate change is given. Magnitude of change is also described. Impacts are described in relation to their scale and intensity, this is in line with the GLVIA3¹ guidance.

Visual assessment matrices are also provided which generally reflect the guidance within the GLVIA3.

Within section 4 – landscape and visual baseline - the report states that a 1 km study area has been proposed in order to consider the effects on landscape and townscape. In order to capture the sensitive landscape of Knightshayes, a wider study area of 3.5km site radius is proposed for the consideration of visual impacts. The potential impact on Knightshayes was particularly noted because of a study on the setting of this property carried out for the National Trust by the Parks Agency in September 2007.

Section 4.3 states that the desktop analysis identified a series of publicly accessible locations for the viewpoints, but not whether these were agreed with the landscape officer of the local council.

The site is described in sections 4.4 through 4.10 including its geology, topography and land cover, although not necessarily in that order.

Sections 4.11 through 4.21 describe the national, county and local landscape character areas, and much of the quoted characteristics apply to the site.

2.2 Evaluation of landscape character and sensitivity

Section 6 comprises the landscape (and views) assessment

This is the most confused section of the document because despite the foregoing methodology, which has been broken down into the components of sensitivity, value and magnitude, the process has not been well followed. Not only that but the writer seems to be confused between visual and landscape impacts and continually strays towards comments on visibility rather than firstly assessing the landscape value and potential impact. Where they are provided, comments are often in the form of a series of anecdotes about each of the elements, with large parts of description about the development, very often with no judgement on the likely landscape impact at all. A major omission is that there has been little assessment of the value of each of the landscape receptors, their sensitivity to change or the magnitude of change that would arise. Furthermore, the landscape receptors relevant to the study have not necessarily been wholly identified within the process.

Landscape receptors comprise elements that are not only designated as significant – such as heritage assets (making up the majority of the topics chosen for discussion in the LVIA) they also

¹ Guidelines for Landscape and Visual Impact Assessment Third Edition (2013) *Landscape Institute and Institute of Environmental Management and Assessment* : Spon Press

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comprise physical components of the landscape such as trees, topography, watercourses and also vegetation types and tree cover patterns. Elements of human activity such as land use and management, settlement character and field pattern are also representative of landscape typology. The aesthetic and perceptual aspects of landscape such as scale, complexity, openness or tranquillity should also be used to help describe and identify the place in question.

The landscape receptors that the LVIA *appears* to include are:

Landscape receptor	LVIA Judgement / analysis given
▪ Landscape character	neutral impact
▪ Townscape character	neutral or beneficial
▪ The GWC Conservation Area	no assessment made
▪ GWC local nature reserve	no assessment made
▪ GWC towpath	no assessment made
▪ Blundells Conservation Area	mentioned but not then evaluated
▪ Tiverton Conservation Area	mentioned but not then evaluated
▪ Knighthayes registered park and garden	assessed in relation to visual impact
▪ Heritage assets – Little Tidcombe farmhouse	no assessment made
▪ Tidcombe Bridge	comments on visibility not landscape
▪ Tidcombe Hall	no assessment made
▪ Trees	refers to standalone tree report

The assessment of landscape impact is therefore virtually non-existent and doesn't include any understanding or reference to the inherent and wholesale change from open countryside to built environment that is envisaged as the core of the development proposal.

Townscape

To further explain the vagaries of the LVIA discursive approach it is worth noting that townscape is a topic included in the GLVIA3 and although reference has been made to its assessment, no process has been applied to the derivation of the judgement shown in 6.22 and described as *neutral* or *beneficial*. It is difficult to understand what this is based on. The text goes on to talk about the design character of the proposed development, without actually assessing whether the status quo is capable of, on the one hand absorbing or conversely being negatively affected by change. In 3.33 the report itself sets out the requirement for a “*clear narrative that describes the effects and their significance*” what is given appears to be an arbitrary judgement not based on any analysis of the existing condition.

While the townscape typology is touched on, there is no discussion of the fundamental structure of this edge to Tiverton, its components, relationships or appearance, beyond noting that some of the housing is from the 1970s.

A more accurate analysis of the townscape might comprise the following: The function of the canal here 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 town

and the open countryside beyond. The blurring of this distinction is made by Tidcombe Hall (for more on this see below).

Apart from anecdotal references to density and garden boundaries along the towpath (6.18) the LVIA overlooks a crucial part of the existing development pattern.

Landscape

The LVIA states the landscape character types within the district, from national to local typologies but what has not been explicitly shown is how the site fits with the typology of the extracted descriptions, and how the relationship of the site's landscape is contiguous with the wider agricultural land.

To illustrate this it is important to note that:

The site does indeed form part of lower land, although not the valley bottom. Because the canal is built slightly perched at about 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 comprises 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 6.27). The character of relatively regular, rectangular fields with longer north-south boundaries that run up the hillsides is very strong through this landscape (and can still be discerned even within the housing areas that have crept 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 – this pattern transcends the line of Warnicombe Lane.

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. The overall context is rolling countryside, with the steeper slopes to the *Cullompton Rolling Farmland* 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.

Heritage assets

Tidcombe Hall (undesigned heritage asset) an early 19th century house, shown as Tidcombe Rectory on late 19th century Ordnance Survey map². 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.

² <https://www.heritagegateway.org.uk/> "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."

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The hall predates the building of the canal, but its setting is enhanced by the set back from the canal alignment (albeit the rear of the building) and the towpath allows public appreciation of the designed components of the house, its walled garden and ornamental trees. 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.

The design proposals, have responded in part to an understanding of this character. However, the proposed access to the development is shown as a 5 metre wide, conventional highway which does not respect either the site sensitivity or the character of the original drive. It also cuts through the line of the existing circular drive at the front of the hall and the proposal is to replace this with a rectilinear lawned frontage, completely losing the sense of arrival at the Hall front door that was originally afforded.

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. In contrast, the proposed access and drive alignment is brutally efficient in cutting through the hall frontage, to access the development land beyond. This is an illustration of an important omission in the LVIA in that no proper assessment of the impact of the proposals has been made on the Hall (one of the landscape receptors because of its designed character) the landscape character or quality of Tidcombe Lane nor the Conservation Area.

Below is an illustration of the type of assessment that should have been followed for this landscape receptor:

Landscape receptor : Tidcombe Hall and its setting		
Category	Assessment	Significance
Description of the receptor	An early C19th house in a designed landscape, set within the GWC Conservation Area, LNR and wider countryside setting, accessed via Tidcombe Lane	
Value of the receptor	An undesignated heritage asset this locally designated building has strong landscape structure with distinctive features. There is a strong sense of place with occasional detracting features in the form of the accreted outbuildings to the hall. The hall entrance, walled gardens, ornamental mature trees and landscape structure are clearly discernible.	Good
Susceptibility of the receptor to change	The designed curtilage of the building, its trees and layout are an integral part of the appearance of the (non-designated) heritage asset. The design intention of the approach is discrete from Tidcombe Lane affording privacy and enclosure to the house front. The development proposals would permanently alter key characteristics of the site, its approach and appearance, its privacy from the street and its context of a country house in open land.	High
Sensitivity landscape receptor	With a good value of receptor and a high susceptibility to change the sensitivity of this receptor is judged to be medium.	Medium
Magnitude of landscape impact	The magnitude of landscape change comprises permanent change to (and loss of) the designed approach, appearance and character of the building setting; development of new	High

	buildings within the walled gardens; loss of countryside context and setting. This is balanced against removal of unsympathetic structures around the hall and stables.	
Significance of landscape effects	With a medium sensitivity of receptor and a high magnitude of landscape impact there would be a moderate impact. The impact is adverse.	Moderate adverse

The visual impact on Tidcombe Lane and the Hall is a separate and equally unassessed impact of the proposed development on this locally distinct element. A viewpoint has not been provided on Tidcombe Lane. (This is dealt with further in Section 2.4)

A Transport Technical Note has been added to the planning portal since this report was commissioned, which proposes a TRO and justification for closing Tidcombe Lane from the new site entrance to Marina Drive, north of Tidcombe Bridge. This would benefit pedestrian and cyclist access to the canal, and potentially reduce traffic to the primary school. However, it wouldn't mitigate the destructive effect on character of the layout of the *primary site access road* as far as can be seen, although it would clearly facilitate access to the site from the south of Tiverton.

Little Tidcombe farmhouse Grade II listed ³ - this building is sited in the centre 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 unassuming in appearance the Heritage England 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 many barns and outbuildings which detract from the immediate setting and appearance of the heritage asset. While the LVIA states that the farm is still a working concern but unrelated to immediate agricultural land, it must be questioned whether the farm is still in agricultural use as the spaces between the barns are parked up with many unrelated vehicles such as white vans.

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, peaceful and open landscape.

An illustration of the type of assessment that could have been provided for this landscape receptor indicates that the impact would be moderate and adverse.

³ <https://historicengland.org.uk/listing/the-list/list-entry/1384974>

Landscape receptor : Little Tidcombe farmhouse and its setting		
Category	Assessment	Significance
Description of the receptor	A C15th farmhouse, set within a farmyard of barns, accessed by its a single track lane north of Warnicombe Lane	
Value of the receptor	The value of the Grade II listed heritage asset is detracted from by the accretion of barns and structures within close proximity to the building. Notwithstanding detracting elements the farmhouse is a nationally designated heritage asset and its setting comprises distinctive rural character	Good
Susceptibility of the receptor to change	The setting of the farm is sensitive to change, apart from scattered dwellings along Warnicombe Lane, the approach along a narrow lane, through fields is open, peaceful and has a strongly rural context. The main aspect of the house, and immediate connection to its context is over open land towards the canal, and beyond this to the wider landscape.	Medium
Sensitivity landscape receptor	With a good value of receptor and a medium susceptibility to change the sensitivity of this receptor is judged to be medium.	Medium
Magnitude of landscape impact	The magnitude of landscape change comprises permanent change to (and loss of) the rural approach to the building and its setting. The development proposals provide a buffer zone around part of the site, but the shift in appearance of the adjoining land to built development would constitute a high magnitude of change	High
Significance of landscape effects	With a medium sensitivity of receptor and a high magnitude of landscape impact there would be a moderate impact. The impact is adverse.	Moderate adverse

Given that the site extent and general components of the development proposal have been established in some detail, the landscape assessment part of the LVIA could more accurately have assessed the following landscape elements to give a rounded understanding of the potential impact on landscape resources:

Contextural landscape receptors	Heritage and designated assets
Rural landscape and overall site setting Trees Drainage Topography Townscape Tidcombe Lane Warnicombe Lane	Tidcombe Hall Tidcombe Bridge Little Tidcombe farmhouse GWC Conservation Area, LNR and towpath

Had this been carried out the study would have shown that there are likely to be significant adverse landscape impacts on the majority of the elements above.

2.3 Views analysis

The LVIA provides 17 viewpoints that have been narrowed down from 30. Whether these 17 were agreed with the landscape officer at Mid Devon is unclear. The LVIA states the view locations were made in discussion with the council – but there is no dated evidence of this.

The basis on which the views were reduced from 30 to 17 appears to be to assess zones or elements of historical/cultural or heritage significance, rather than including views which would be seen by lots of people on local footpaths, or lanes for example. And having walked a couple of representative local footpaths it is possible that the views selected would have benefited from a more factual assessment of visibility rather than only assessing what appear to be more important locations. As it turns out many of the latter have no view of the site whatever, whereas local footpaths have some clear and unobstructed views.

The land is well wooded, folded towards the valley and this tends towards reduced site visibility. Nonetheless it is unlikely that all the views are *prima facie* negligible or minor neutral as the LVIA states.

The connection to the wider landscape has been discussed under landscape sensitivity above. And the higher land, on both sides of the valley gives rise to longer distance visibility in some cases affording a clear view of the site. In near views, the rising land, the mid ground to the main southern hillside, permits visibility of the site and this can clearly be seen from the photographs below that are taken from the towpath.

Houses at Lower Warnicombe



Unassessed viewpoints are discussed further below, following a commentary of the views that have been assessed.

It is worth noting however that the assessment methodology given in the earlier chapters of the LVIA has not entirely been followed and has given way to a kind of discussion on the existing and proposed without sufficient systematic analysis of the value, sensitivity or magnitude of the view. In some of the photographs such analysis might seem irrelevant, but nearer to the site and in locations which are designated for their special character, a more rigorous evaluation is essential to understand fully the visual impact of the development. This process also makes the decision making more transparent for the reader and without it the information provided appears to rely too much on opinion.

Not only has there been a cursory adherence to the methodology given, but the compounded effect of the Tiverton eastern urban extension has been conflated into the analysis. Rather than assessing the effect of the development that is the subject of the study as a precursor, and then at the end of the study evaluating the compound effects (as the guidance in the GLVIA3 sets out) a commentary on the two developments has been given concurrently. This is not only unhelpful, but it sounds in some cases as if the urban extension justifies the additional development impact examined within the study.

As it is the majority of the identified viewpoints are unlikely to provide a compounded impact taking the urban extension into account. Viewpoints to the south and west of the site are more sensitive to this impact. Newtes Hill (view 10) and unsurveyed views along Warnicombe Lane may be more sensitive to a compounded impact. View 12 from Knightshayes Church Path does not appear to be affected.

The evaluation of the views selected in the study follows. At the end of this a table is provided comparing the judgements reached by the study in parallel with the judgements reached by this independent review:

View 1 Knightshayes Court looking south east from front of house

From this location there is a distant view of Tiverton and the opposite hillside. The orientation of the view is more accurately south-south-west than south-east, and from this orientation the site is not visible.

View 2 Knightshayes Plantation looking south west

It was difficult to find the exact location of this photograph, but it does not comprise the designed and iconic view from the front of the house. It is also 4 kilometres from the site so the potential for distinguishing the site within a well wooded landscape in summer is very slight. The photograph in the LVIA was taken on a day of poor visibility, on a brighter winter day the slight potential to be able to distinguish the site would still give rise to an assessment of negligible as given in the LVIA.

View 3 Chevithorne war memorial

While the assessment has recorded that there is a view from this location with a *medium* sensitivity, the effect of the development on this view would be a *readily noticeable change* because the view is currently of open countryside, and the only built development is scattered farms and hamlets. An urban development would be a complete change to this and even at this distance it could not be construed as *negligible*. A *medium* sensitivity, with a *medium* magnitude of change would result in a *moderate* visual impact.

The relative importance of the location here is described, what is not taken into account is the visibility from along the lane towards Chettiscombe and of a footpath (No 18) that leads to Peadhill Farm. From many locations along these routes there are views of the site which are not shielded by trees because of the elevation of the viewer. These have not been recorded or assessed.

View 4 Craze Lowman

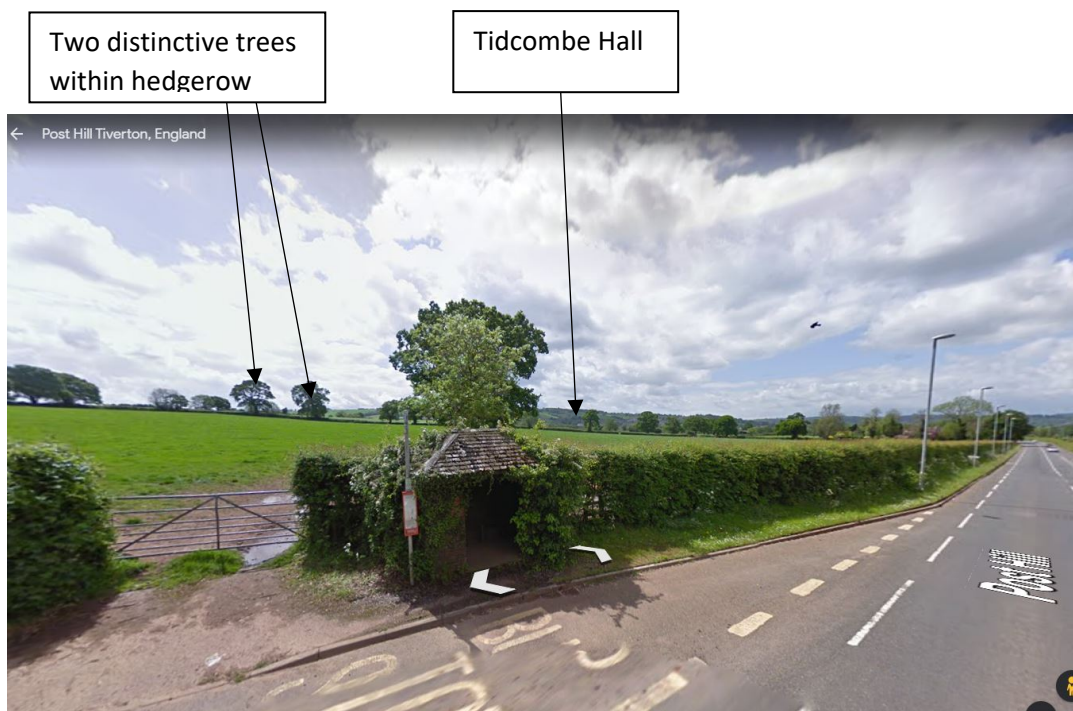
A photograph of a group of buildings has been provided, indicated that there is no view from this location, but there is a footpath (No 20) north from this hamlet that rises towards Peadhill Farm from which there almost certainly would be a view of the site. On the lane that leads south from Craze Lowman the Lowman river is bordered by a footpath (also No 20) but the land elevation has fallen by this point, and within a well vegetated landscape, with the intervening line of the well wooded former railway line (now a cycle path) it is unlikely that there would be any site visibility.

Had the viewpoint been assessed from the upper footpath a view is highly probable.

View 5 Uplozman Road / Blundell's Road / Post Hill

This view purports to be of the eastern urban extension but it is not. The field gateway is opposite the junction of Uplozman Road with Blundell's Road as it becomes Post Hill, and shows agricultural land that would remain as such. The eastern urban extension is behind the viewer further north and east. The location of the development site on the LVIA annotated photograph is also incorrect as the site is much further to the west, and Tidcombe Hall can just be discerned as shown on the marked up photo below.

The distinctive trees on the southern field boundary that match those in the LVIA photograph can be seen in this snip from Google Earth. While the below is not a photograph taken with the requisite methodology given in the GLVIA3, it illustrates that there is a view from this location, albeit it is unlikely to be significant (because of the distance from the site) and it is agreed that this impact would be minor.



Source Google Earth

View 6 Tiverton Bridge and car park

This view is from the bridge over the GWC looking south west. There is a lot of intervening vegetation in the view and it is difficult to make out the Hall among the trees. It is agreed that this location has a *medium* value, and *medium* sensitivity generated from the number of visual receptors being within the Conservation Area and at a well-used location above the towpath.

It is unlikely that the majority of the development would be visible at all, although the extreme south western part of the site could be visible. Without better photographic evidence and a systematic evaluation process it is difficult to be certain about that. At this point the judgement of *negligible* may equally be *minor*.

View 7 Pool Anthony

Although substantially closer to the site, the reduction in elevation and the extremely dense intervening vegetation along the former railway line, and in woodland below the listed farmhouse, makes any view of the site impossible especially in the summer. It is agreed that there is no visual impact from this location.

View 8 Rowridge

This location to the south east of the site is within the countryside and accessed via deep, narrow, Devon lanes. The north-south hedgerow boundaries, which are well vegetated with mature trees, make views of the site completely screened from this direction. It is agreed that there would be no impact from this location.

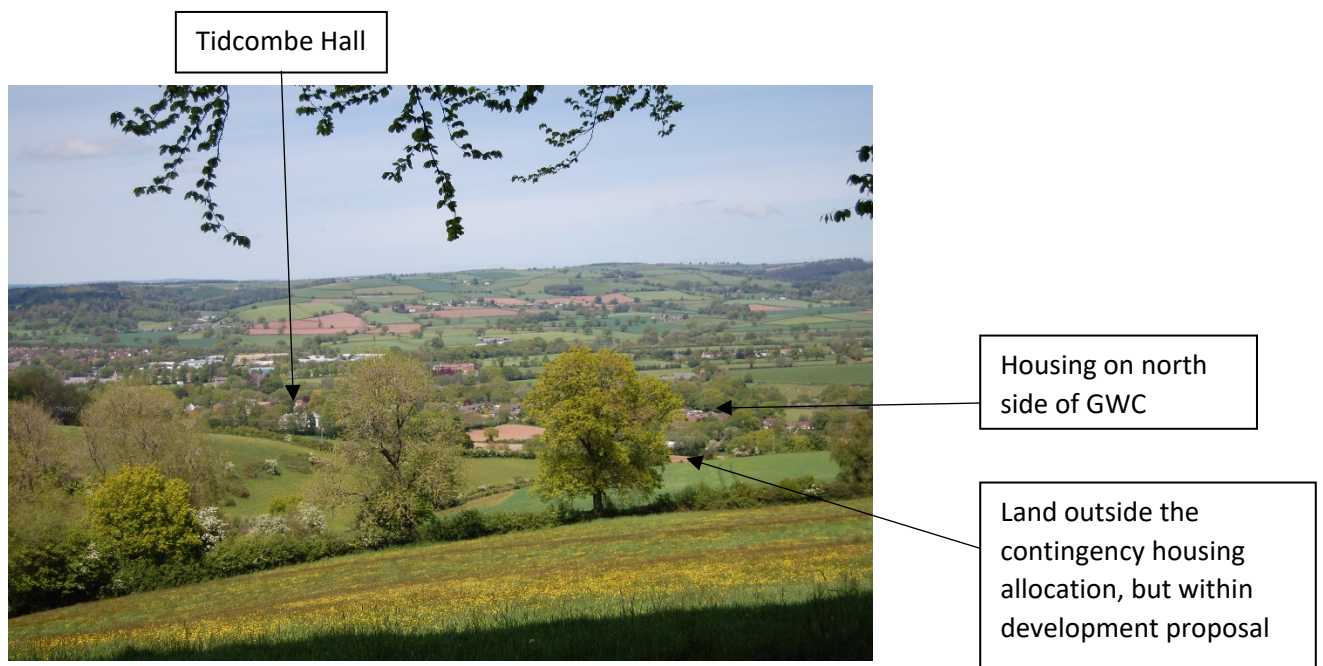
View 9 Thurlescombe Cross

Further to the west than the previous location, the housing within the eastern 1970s development north of the GWC can be discerned. The site is however generally absorbed in vegetation, and not visible. It is agreed that the view is *negligible* from this location.

View 10 Newtes Hill

This view is from a location close to the Warnicombe Plantation on Newtes Hill. The text says that the site is unlikely to be visible in summer when the trees are in leaf. However the impact of the development from the environs of this viewpoint has been underestimated. There is a local footpath (No. 31) that runs north-south following field boundaries from beneath the plantation to Warnicombe Lane. This path gives a clear view of the eastern site that is within the development but is outside the contingency housing allocation, and the visual impact of the proposed development should have been assessed from this location. See my photographs below.

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Given the above comments the judgement may be more accurately assessed as follows: The value of the view is *low*. The magnitude of change is judged as *medium*, as the development would be a readily noticeable feature with the view, making a *minor* visual impact.

View 11 Lime Tree Mead

From the housing area west of Tidcombe Lane this viewpoint shows Tidcombe hall between the roofs of the modern housing. There are also glimpses through the gaps between the modern houses

to more open areas of the site beyond. The assessment classes this view as a *negligible* impact and this is likely.

View 12 Knightshayes Church Path – setting study viewpoint

This view is taken from Church Path, above the village of Chettiscombe. Knightshayes is Grade I listed and its listed park and garden is II*. “The setting of Knightshayes Park and Garden – A Historic Landscape Assessment” produced for the National Trust in 2007, refers to Tidcombe Hall as a *notable feature* in the view from Church Path. Tidcombe Hall is still visible today as evidenced in View 12, as is Lower Warnicombe Farm. The main change in the view since the 1970s is the growth of housing on the south eastern fringe of Tiverton, which comprises a large and highly visible urbanisation of the middle zone of the southern hillside.

The annotated photograph in the LVIA indicates the site area with white lines estimating the land boundary at ground level. It is true (as the LVIA states) that the visibility of buildings within the proposal would depend on their materials and height, but given the visibility of the Canal Hill dwellings it is highly likely that some of the development would be visible, particularly that towards the south eastern side of the site, rising towards Lower Warnicombe Farm. The size of the site, and its prominence in the panorama are also cause for concern. However, without more precise information on the development proposal it is difficult to assess the exact extent to which the development would be visible. Because of the sensitivity of this nationally significant, historic and well catalogued viewpoint, it would be beneficial to see verified views generated from an accurate site model to enable a more considered and accurate assessment of visual impact to be made.

Having said that, the accuracy of the LVIA on this viewpoint is open to dispute. The study describes the viewpoint as of *high sensitivity* which is agreed. The magnitude of change however cannot realistically be classed as *very low* given the extent and prominence of the potential site in the view, notwithstanding the current tree cover. This is, after all, a best case view with the trees in full leaf. Following the methodology set out in the LVIA a more accurate assessment of the magnitude of change would be *low* and this coupled with high sensitivity to change would result in a *moderate* impact. The LVIA has given a *minor neutral* potential impact, not in itself a term that is given in the methodology.

It is clear that this location would benefit from further study, but on the face of the LVIA information given the impact of the view tends to be underestimated.

View 13 GWC towpath

The visual assessment includes viewpoints along the towpath, and among these there are views where the site visibility is limited by distance, and in this case vegetation. This view is taken 2km from the site, and is of *medium* sensitivity as it is within the GWC Conservation Area. The *very low* magnitude of impact is agreed which coupled with a *medium* sensitivity results in a *negligible* visual impact.

There are closer views that are much more representative of the local impact and these are given in more detail below.

View 14 Blundell's Conservation Area

A view from within the Blundell's Conservation Area at the junction of Tidcombe Lane with Blundell's Road. Most of Blundell's Road has a continuous hedge often banked above the road height, which effectively screens views to lower land to the south. It is agreed that this location would not be affected by visual impact.

View 15 GWC towpath

There is some inconsistency in the way that the photographs and the site location information is represented, because the extent of the site is clearly shown in some, and not in others. For example on viewpoint 15 the annotation does not indicate the site extent in the same way that has been shown on other views. And this tends to under-represent the extent of the site in this particular view.

View 15 is judged to have *medium* sensitivity agreed, but the magnitude of change is likely to be *high* because the development would form a prominent feature and focus within the view. This would result in a *moderate* visual impact. The impact is judged to be adverse.

View 16 GWC towpath

In order to illustrate a more logical process for this particular viewpoint, that would also be helpful on critical near views, a table showing the sequential assessment is set out below indicating how each part of the judgement follows that of the previous. This is based on the tables from the GLVIA3 that are also represented in the LVIA text, though not necessarily adhered to.

Viewpoint 16 : Grand Western Canal towpath		
Category	Assessment	Significance
Description of the view	A view along the towpath within the Conservation Area, and within a local nature reserve. The view shows Tidcombe Hall with its walled garden and ornamental trees framing the building. These elements are clearly part of the setting of the Conservation Area which includes the large meadow between the canal and the house environ.	
Value of the view	The Conservation Area and LNR give the view significance as medium	Medium
Susceptibility of the receptor to change	Visual receptors are likely to be visitors and local people who are walking the towpath at a leisurely pace, for recreation, health and wellbeing or exercise, they would therefore be cognisant of the locality and appreciative of their surroundings.	Medium
Sensitivity of the view	With a medium value of receptor and a medium susceptibility to change the sensitivity of this receptor is judged to be medium	Medium
Magnitude of visual change	The magnitude of visual change depends on the height of the houses proposed within the walled garden. They would comprise a readily perceptible change above the line of the wall, which is otherwise only topped by vegetation. And	Medium

	using the LVIA criteria : <i>where the development would be a readily noticeable feature within the view</i>	
Significance of visual effects	With a medium sensitivity of receptor and a medium magnitude of visual impact there would be a moderate impact. The impact is judged to be adverse.	Moderate adverse

Rather than the *minor neutral* impact (not in itself a term provided in the methodology) indicated in the LVIA this process demonstrates that the visual impact would be more significant.

View 16 GWC towpath

A view of the meadow between the rear of Tidcombe Hall and the towpath, all the land shown in the photograph is within the Conservation Area. It is agreed that this view is of *medium* sensitivity. Development behind the line of the walled garden is likely to be readily noticeable and the visual receptors (people walking or moving along the towpath) would have a clear view of the changes inherent in the development. A *medium* value of view, coupled with *medium* magnitude of change results in a *moderate* visual impact. Again the LVIA has underestimated the extent of the impact and has classified this as *minor neutral* (not a term used in the methodology).

View 17 GWC towpath and Tidcombe Bridge

This view is taken further west from the previous location and shows the western side (the stables?) of the Hall along with the *Cedrus libanii*, *Quercus* and other parkland trees close to the house. The focus of the view is Tidcombe Bridge (listed Grade II) which is seen with housing in the Canal Hill area rising above it.

The LVIA states that the majority of the new build development would be located to the east of the Hall, although conversion of the outbuildings and the Hall itself may have some impact on their appearance, including removal of some unsightly structures. What is not clear in this view is the extent to which the new access would affect the zone between the bridge and the Cedar. The proposals indicate a conventional highway layout, with regular footways, lighting, signage etc and the hedge which is seen running away from the bridge parapet towards the secondary access will remain. The structure of the existing entrance however, would be substantially remodelled. Trees would be lost at this realigned entrance, and there would be detrimental effects on the Lucombe Oak and a mature Lime, both of which are prominent in the views from within the Conservation Area and are seen above other vegetation in this view (and noted as being key trees in the tree survey⁴). Further development of the alignment of the entrance has been provided and shows the position of the proposed rebuilt boundary wall. What has not been indicated (as far as can be seen) is how the levels would be dealt with. Currently the wall on Tidcombe Lane retains trees on a banked level approximately 1.95 metres above the level of the lane. The alignment of the new entrance appears to be drawn without regard to the substantial level difference at this point and accommodating the level difference is likely to have a more detrimental effect on the root protection areas of the retained trees than has been indicated in either the tree report or the highway alignment layout. Understanding the levels and including proposals to incorporate the level change is key to

⁴ Aspect Tree Consultancy 14 08 2018

understanding the real impact on trees, and, in turn, the view from within the Conservation Area towards Tidcombe Lane.

The LVIA classes the value of the view as *medium* which is agreed because of the listed building and conservation area status. The magnitude of change may be more accurately predicted as *low* – pending more detail on the access road (rather than *very low*), which would result in a *minor* visual impact. As the trees are *de facto* TPO'd the full extent of the damage caused by the new access road is yet to be properly understood.

2.4 Unassessed viewpoints

Beyond the 17 viewpoints assessed and discussed above, there are other locations, particularly close to the site where from a recent site visit, and map analysis, there are clear site views. Some of these are critical to appreciate the effect of the development and would have a potentially significant visual impact, it is a major omission that these have not been assessed. Above and beyond the extent to which the assessment has not accurately predicted visual impact in Views 1-17 (in my opinion), the overall extent of visual impact has been under-represented, by not including some obvious local locations.

The key locations which have not been included are:

- Tidcombe Lane, a viewpoint should be assessed that includes the entrance to the hall and shows the location of the proposed access road
- Warnicombe Lane – there are a sequence of northward views between the scattered houses along the lane that provide views towards the canal, over the unallocated land
- the entrance to Little Tidcombe Farm where the south eastern field is plainly visible
- Footpath 32 leading from the Warnicombe plantation (this has been mentioned above)
- Footpaths 19 and 20 above Craze Lowman and towards Peadhill Farm

2.5 Overall evaluation quality and rigour

The following table gives an overview of the LVIA assessed impacts juxtaposed with those of the review of the study.

No	LVIA viewpoint description	Study judged impact	Review of LVIA judged impact
1	Knightshayes Court looking south east from front of house	N/A	N/A
2	Knightshayes Plantation looking south west	Negligible	Negligible
3	Chevithorne war memorial	Negligible	Moderate adverse
4	Craze Lowman	N/A	Wrong location
5	Uplowman Road / Blundell's Road / Post Hill	Negligible	Negligible
6	Tiverton Bridge and car park	Negligible	Minor adverse
7	Pool Anthony	Negligible	Negligible
8	Rowridge	N/A	N/A
9	Thurlescombe Cross	Negligible	Negligible
10	Newtes Hill	Negligible	Minor adverse
11	Lime Tree Mead	Negligible	Negligible
12	Knightshayes Church Path – setting study viewpoint	Minor neutral	Moderate adverse
13	GWC towpath	Negligible	Negligible
14	Blundell's Conservation Area	N/A	N/A
15	GWC towpath	Minor neutral	Moderate adverse
16	GWC towpath	Minor neutral	Moderate adverse
17	GWC towpath and Tidcombe Bridge	Minor neutral	Moderate adverse

3 Summary and conclusions

This document reviews the findings of the LVIA provided in support of an outline planning application for land at Tidcombe Hall and Little Tidcombe farm.

The LVIA provides a suitable methodology for providing a well-substantiated assessment of landscape and visual impacts that would arise as a result of the development, but fails to follow it especially in relation to the effects on landscape resources.

The cumulative impacts of the Tiverton eastern urban extension have been conflated with the assessment for the development site making it difficult to evaluate whether and where this would have a substantive effect on visibility or landscape resources. The cumulative impact should be a separate part of the document, with the main development proposal assessed first, followed by an assessment of the impact of both developments taken together so that this can be clearly understood. Cumulative impacts are most likely when viewed from the south and south-west of the site.

This review gives an overview of the ways in which the landscape receptors are likely to be affected by the development proposal. The study has not quantified these impacts in the same way that the visual effects have been enumerated, but the conclusion is that the majority of the identified receptors (among which are nationally as well as locally designated heritage assets) would be adversely affected by the development. This is contrary to the findings of the study, which largely fails to provide an assessment of the significance of impact on landscape resources.

Within the visual assessment the likely visual impact of the development proposal has been underestimated in 7 of the 17 views given. There are likely to be 5 significant adverse visual impacts as a result of the development proposal. A further five suggested viewpoints have been identified in the course of this review, these would give additional locations close to the site that are likely to be adversely affected by the visual impact of the development proposals.

Among the assessed viewpoints in the LVIA, the potential for significant adverse visual affect has been noted on the nationally sensitive view from the listed Knightshayes estate.

Jane Fowles
Novell Tullett
3 June 2021

See space differently

