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Wendy Ormsby  
Development Management  
South Hams District Council  
Follaton House  
Totnes  
TQ9 5NE

Date: 30<sup>th</sup> November 2016

Dear Wendy,

**Consultation response to planning application**

The South Devon AONB Unit **has a neutral position** to planning application **0771/16/OPA**.

The application site lies outside of the AONB boundary but contributes to the setting of the South Devon AONB in the Chillington area. The applicant's evidence demonstrates the potential for some development to be accommodated at this location without compromising AONB special qualities, natural beauty, distinctive characteristics and key features. However, were the applicants to come forward with a full application containing the current layout and distribution of proposed illustrative housing types, we would be likely to object. Insufficient priority appears to have been given in the layout and design at this outline stage to landscape and visual impacts, in particular consideration of how the development would be read in the landscape within views out from the protected landscape of the AONB.

For these reasons a neutral position is being adopted in relation to this proposal given that it is currently at outline stage. However, please note the points of concern outlined below that accompany this conclusion.

Planning application number:	0771/16/OPA
Case officer:	Wendy Ormsby
Site name:	Land at SX 791 430 To Rear Of Green Park Way Chillington
Description of proposal:	READVERTISEMENT Outline planning application for planning permission to erect up to 65 dwellings (including market, affordable and retirement housing) landscaping and associated works

Thank you for inviting my comment on this application. This response is subject to the general notes overleaf and is based on:

✓	An examination of the planning file and submitted plans
✓	A visit to the application site
✓	A viewing of the site from the surrounding area

## **Reasons for response**

### **National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG)**

As the application site is located outside of the AONB, the provisions of NPPF paragraph 116 cannot be applied in this instance.

Footnotes 9 and 10 to NPPF paragraph 14 restrict the normal presumption in favour of sustainable development and given the site's location in the setting of the South Devon AONB, effectively transfer the starting point for assessing this application to NPPF paragraph 115. Great weight should therefore be given by the Planning Authority to conserving landscape and scenic beauty in the AONB when weighing the planning balance for this application. NPPF para 109 reinforces this approach "*The planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes...*".

### **Duty of regard and the AONB purpose**

In considering this planning application, the Planning Authority is reminded of its overriding statutory duty of regard for the purpose of conserving and enhancing the natural beauty of the AONB (Countryside and Rights of Way Act 2000, s 85) and of the policies in the Council's adopted statutory management plan for the South Devon AONB.

The duty is relevant in considering development proposals such as this one that are situated outside the AONB boundary, but which might have an impact on the setting of, and implementation of the statutory purpose of, the AONB.

### **South Devon AONB Management Plan and Planning Guidance Annex**

The South Devon AONB Management Plan 2014-19 is a statutory document and a material consideration in determining this application. The AONB Management Plan assists decision-takers in applying the provisions of the NPPF and in responding to the legal duty of regard for the AONB purpose. Information is provided within the Plan and its Annexes to enable decision-takers to fully understand:

- what makes the South Devon AONB a valued landscape;
- aspects of landscape and scenic beauty to be conserved and enhanced;
- AONB special qualities;
- forces for change acting on the AONB;
- the AONB policy framework and priorities for action;
- and emerging AONB Planning Guidance, currently in post consultation draft form.

Particularly relevant policies from the South Devon AONB Management Plan include:

- **Lan/P1** *The special qualities, distinctive character and key features of the South Devon AONB landscape will be conserved and enhanced.*
- **Lan/P2** *The use of landscape and seascape character assessments and historic landscape and seascape characterisation will be advocated so that land use and marine planning and management decisions respect, maintain and where possible enhance the special qualities of the South Devon AONB.*
- **Lan/P4** *Levels of tranquillity throughout the South Devon AONB will be maintained, and where practicable enhanced, in order to ensure this special quality is not further devalued. (particularly in respect of lighting and natural nightscapes)*
- **Lan/P5** *The character of skylines and open views into, within and out of the South Devon AONB will be protected. Suitable alternatives to infrastructure responsible for visual intrusion will be sought together with improvements to reduce the visual impact of unsightly past development. Priorities include protection against intrusive energy generation, transmission and communications infrastructure; external lighting that*

*creates night time scenic intrusion; and visually dominating buildings that are inconsistent with landscape character. (particularly in respect of lighting and natural nightscapes)*

- **Plan/P2** Development management decisions give great weight to the purpose of conserving and enhancing the natural beauty of the South Devon AONB; and support development that is appropriate and proportionate to its setting within or adjacent to the South Devon AONB

### **AONB Special Qualities**

The AONB special qualities most pertinent to this application are considered to be:

- Deeply rural rolling patchwork agricultural landscape.
- Deeply incised landscape that is intimate, hidden and secretive away from the plateau tops.
- Iconic wide, unspoilt and expansive panoramic views
- A variety in the setting of to the AONB formed by the marine environment, Plymouth City, market and coastal towns, rural South Hams and southern Dartmoor.

The applicant's evidence demonstrates that the location has the potential to accommodate some development that may not cause unacceptable levels of harm to the AONB special qualities found in the Chillington area. However in its present form, the indicative design, layout and housing types do not sufficiently respect the site's location in the setting of the South Devon AONB.

### **Landscape, Visual Impacts and Scenic Beauty**

The outline layout and design of indicative housing types does not suggest that the strong pre-application steer for a landscape led scheme has been sufficiently followed.

Direction should be given to address those design aspects that would otherwise increase the conspicuousness of new build elements when viewed from within the AONB. This should include due consideration of:

- The potential impacts arising from the incorporation of large individual glazing expanses and the total area of glazing as a proportion of any southern facing elevations. Recognition of daytime reflective glare from glazed surfaces plus glare and lightspill through glazing from night-time interior lighting use.
- The potential impacts arising from the colours and surface areas of rendered elevations drawing attention in views out from the AONB. Development should be limited to 1.5 storeys and use recessive colours on renders. Partly to limit the visual impact of buildings located within the upper slopes of the site, particularly in the northwestern corner, without the benefit of the farm buildings as a backdrop; and partly to break up the potential expanse of render with roofing materials.
- Building density. A density and layout should be developed that more closely blends with housing on the slopes below the application site. This approach will ensure that new buildings read as part of the rest of Chillington instead of highlighting this as an obvious add-on that draws attention in views out from the AONB

Accepting that this is an outline application with more detail to come through reserved matters, the principle of retaining existing landscape features is sound to enable the field pattern to be read into the future. However, these features will only remain into the future if they are excluded from domestic curtilages, considered more as public realm features and retain their agricultural look and feel. A commitment to an appropriate management plan is sought to cover long term management and maintenance of both perimeter and interior hedgebanks, inclusive of related features including hedgerow trees, stone-facing if applicable and grassy margins.



If future reserved matters information is being prepared we would appreciate an involvement to be satisfied that character, visual and lighting impacts upon the AONB have been fully assessed, appropriately considered within design and layout; and mitigated as far as reasonably practicable.

### **Summary**

Although the applicant's evidence at this outline stage demonstrates that the location has the potential to accommodate some development, if a full application were to be submitted following the indicative layout and housing types illustrated, it is likely that we would respond with a formal objection.

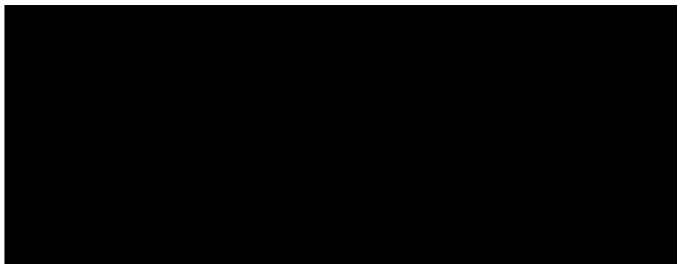
Our conclusion is reached on the basis that the current proposal's design and layout is not sufficiently protected-landscape led; and that in its current form the proposal, particularly the north-western most up-slope components are likely to cause an unacceptable level of harm that is unlikely to be mitigated. The current indicative layout does not adequately conserve or enhance the natural beauty and special qualities of the AONB found in the Chillington area.

A revised approach to layout and building design may overcome these concerns.

For the reasons outline above the South Devon AONB Unit has a **neutral position** on this application with the identified caveats concerning layout and design.

Please do not hesitate to contact me if you require further information or clarification.

Yours sincerely



Roger English, South Devon AONB Manager

### **General notes.**

1. *This response presents the views of the AONB Manager. It does not necessarily represent the views of member organisations of the wider AONB Partnership Committee, some of which may be involved in making their own separate representations.*
2. *Although the South Devon AONB Unit is based at the District Council's offices, this response should be treated by the planning authority as a representation from an outside body, rather than an internal officer comment.*
3. *This response is based on the NPPF and the policies and objectives of the statutory South Devon AONB Management Plan.*