

ED36: Additional Paper – Hearings Matter 1 Issue 3 Sustainability Appraisal Note for Inspector on SA & Landscape Evidence

05 March 2021

- 1 Natural England (NE) asserted in their Hearing Statement that site allocations are not supported by a Landscape and Visual Impact Assessment (LVIA) and thus there is insufficient evidence to enable DNPA to conclude no harm to the protected landscape. Where the SA concludes negative effects on landscape for allocations it does not conclude whether or how these can be mitigated.
- 2 This was discussed at the Hearing. DNPA considered there is no formal requirement to demonstrate 'no harm'. DNPA explained that the plan-making and SA processes had both used the same evidence – Landscape Character [SD1 13] for the whole NP area and the Landscape Sensitivity Assessment [SD1 14-1 17] for the relevant settlements. DNPA does not consider that LVIAs are appropriate studies for this plan preparation but rather may be more suitable for large scale allocations or applications. LVIAs would not be proportionate - taking into account the characteristics and scope of the DNPA Local Plan.
- 3 NE concurred somewhat but requested that there should be a greater level of scrutiny for landscape impacts on a site-by-site basis. The Inspector invited DNPA to suggest what might be a proportionate approach to such a request and what might be the implications – to be set out in short Note.
- 4 The plan-making and SA processes are iterative, ongoing and share proportionate and relevant evidence at each stage of plan preparation. Potential options for consideration as proposed site allocations were subject to the Land Availability Assessment studies (LAA, 2017)¹ and the Sites Assessment Method. Landscape character and sensitivity was a criterion used in these methods. Any site options that might have likely major negative impacts on landscape were not taken forward into the list of reasonable alternatives to be tested through SA.
- 5 All site options that were found to be reasonable – suitable, realistic – were subject to SA individually using the full sites SA framework and with details provided in Appendix V (October 2017 & updated September 2018) [CD11] of the SA Report [CD05]. This included SA objective No 1 to conserve and enhance the landscape and settlement character of the DNP. These initial SAs of site options record potential minor negative effects but do not suggest any mitigation possibilities at this stage. However, there are possibilities for mitigation measures implicit in the significance categories for the SA (table 2.1) – minor negative = mitigation and/or negotiation possible.
- 6 At this early stage of plan-making, the SA of each site option (for example, see pages 3-4 of CD11) references landscape evidence – character and sensitivity assessment where relevant – and includes relevant discussion of effects on a site-by-site basis, but also considering cumulative effects for each settlement. SA [SD05] paras 6.18-6.20 provide a discussion on the SA findings of site options for landscape and settlement

¹ <http://www.dartmoor.gov.uk/living-and-working/business/planning-policy/background-evidence/land-availability-assessment-shlaq>

character. It is noted that whilst most options might have minor negative effects, some options are neutral, and 2 options are minor positive because they are brownfield sites. There are no site options with major negative effects and para 6.19 explains that options would be expected to comply with the high standards in the Design Guide SPD, inferring that such a strong mitigation measure would ensure that minor negative effects would be satisfactorily addressed.

- 7 At the next stage of SA, the preferred site options that are progressed were subject to SA and the findings are discussed in SA Report [SD05] paras 6.40-6.45. This considers the site allocations as drafted (with site-specific requirements) and the requirements of other Policies, such as SP2.1. SA para 6.44 explains that new development will also have to comply with Policies 1.6 & 2.1, and together with the Design Guide SPD ..." *indicate that such negative effects can be mitigated*". The site-specific requirements for Proposal 7.20 Land at Binkham Hill Yelverton providing some mitigation measures is also reported. Para 6.43 explains that overall, negative effects have been avoided or minimised through careful selection of location of sites.
- 8 It is accepted that SEA/SA is required to "*identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them*"². Plan-making has applied the highest level of the mitigation hierarchy by avoiding sites that might have major negative effects. The SA of the options for sites identified likely effects ranging from minor negative through neutral to minor positive for landscape; there were no major negative effects found for any of the site options. The SA could have explicitly mentioned that mitigation measures could include planting for screening, orientation of buildings to minimise effects, and so on. However, it was appreciated that all new development in the DNP would be required to meet with the Design SPD, which provides strong mitigation measures. The SA understood that site-specific requirements were being prepared in development briefs and that these, together with other Plan Policies, provided confirmation that mitigation measures are in place to resolve potential negative effects, including cumulative effects.
- 9 Therefore, the DNPA considers that the potential effects on landscape sensitivities and settlement character have been addressed on a site-by-site basis through the sites assessment and SA processes, and using relevant and proportionate evidence. For completeness, a summary of the landscape matters identified and the response through the specific Proposal (allocation) requirements, supported by the detailed Development Site Briefs, is provided at Appendix 1.

² <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#strategic-environmental-assessment-and-sustainability-appraisal>

APPENDIX 1: Summary of SA, Local Plan mitigation and Site Development Brief advice/requirements

	LP Policy	SA Site Options: Landscape & Settlement Character ³		Specific Proposal wording (where relevant)	Other key relevant plan policies	Site Development Brief: constraints ⁴	Site Development Brief: advice/requirements ⁵
Ashburton							
Land at Longstone Cross	7.3	-	0	none	SP1.1, SP1.2, SP1.6, SP2.1, SP2.5	Some visibility via distant views from the north.	Landscape and Environmental Management Plan Landscaping to soften the urban edge and enclose where development adjoins open parts of the field.
Land at Chuley Road	7.4	0	+		SP1.1, SP1.2, SP1.6, SP2.1, SP2.5	The site's boundaries include mature hedgerows and wooded areas which support local wildlife.	Opportunity to introduce new tree and hedge landscaping which will support biodiversity. Landscape and Environmental Management Plan
Buckfastleigh/Buckfast							
Land at Barn Park (Wallaforde Rd)	7.5	-	0		SP1.1, SP1.2, SP1.6, SP2.1, SP2.5	Mature trees and hedgerows on site borders. No heritage or landscape constraints, but visually prominent from some views from the east.	Landscape and Environmental Management Plan Mature trees and hedgerows adjacent to site support biodiversity and provide key habitats; these must be retained and reinforced. External lighting and glazing must be compatible with Strategic Policy 2.5 Protecting tranquillity and dark night skies
Land at Holne road	7.6	-	0		SP1.1, SP1.2, SP1.6, SP2.1, SP2.5	Site is well screened by mature hedges but will present a new urban edge to Buckfastleigh.	Landscape and Environmental Management Plan Boundary treatments and public realm should be focused on community and pedestrians, should be

³ Please note: 1) these are the summary assessment of sites at options stage; therefore, this is the appraisal findings before mitigation measures have been applied through any development requirements. 2) The first symbol refers to landscape sensitivity and second symbol refers to settlement character

⁴ Site constraints are identified from the evidence described in this paper, including in particular; Land Availability Site Assessment (undertaken through site visit and professional officer appraisal), Landscape Character Assessment, Landscape Character Appraisal, informed by comments received at Sites Consultation Stage. The Development Site Briefs were published alongside the Regulation 18 draft Local Plan for public comment.

⁵ This advice/requirements is described in the corresponding Development Site Brief, and includes cross reference to Regulation 19 draft Local Plan policies. This comprises the policy stage mitigation which the SA report [CD05 para 7.28] confirms that mitigation measures are in place to resolve potential negative effects including cumulative effects.

						<p>sympathetic with the National Park's traditional vernacular, and where possible support biodiversity.</p> <p>External lighting and glazing must be compatible with Strategic Policy 2.5 Protecting tranquillity and dark night skies</p>
Land at Axminster Carpets	7.21	+	+?		SP1.1, SP1.2, SP1.6, SP2.1, SP2.5	<p>A well-located brownfield redevelopment site with opportunity to improve the local built environment and deliver multiple public benefits.</p> <p>Opportunities for river side open space and/or biodiversity enhancements.</p> <p>The site's boundaries include mature hedgerows and some wooded areas which support local wildlife. Opportunity to introduce new tree and hedge landscaping which will support biodiversity.</p> <p>Site currently unrelated visually or aesthetically to the significant buildings of the Abbey; opportunity to create linkages.</p> <p>External lighting and glazing must be compatible with Strategic Policy 2.5 Protecting tranquillity and dark night skies</p>
Chagford						
Land at Lamb Park	7.7	-	0		SP1.1, SP1.2, SP1.6, SP2.1, SP2.5	<p>Minor to Moderate potential for Landscape impact to the north.</p> <p>Large site with potential for community orchards or gardens.</p> <p>Gentle slope down to east and north of site creates logical location for biodiversity enhancements and SUDS.</p> <p>Key views from the site particularly to the north and west. From the North (including PROW Footpath 16) site is visible but seen in the context of the urban edge of Chagford at Lamb Park; opportunity to</p>

							<p>soften or improve the urban edge of Chagford from the North.</p> <p>Landscape and Environmental Management Plan</p> <p>External lighting and glazing must be compatible with Strategic Policy 2.5 (2) Protecting tranquillity and dark night skies.</p> <p>Consider mix of building heights (opportunity area for bungalows) to preserve distant views and soften urban edge.</p>
Land at Crannafords	7.8	-	0	Development of this site must: b) enhance the quality of the built environment and public realm of the Crannafords employment area	SP1.1, SP1.2, SP1.6, SP2.1, SP2.5		<p>Though out of town, site provides a 'gateway' opportunity with well-designed and high quality rural non-residential development and appropriate landscaping.</p> <p>External lighting and glazing must be compatible with Strategic Policy 2.5 Protecting tranquillity and dark night skies</p> <p>Landscaping and building layouts along the B3206 to minimise negative impact and ensure any views from carriageway are of high quality development and public realm.</p>
Horrabridge							
Land at New Park	7.9	-	0		SP1.1, SP1.2, SP1.6, SP2.1, SP2.5	Priority habitat in hedgerows and along Walkham River 150m south of Horrabridge Conservation Area	<p>The site's boundaries include mature hedgerows and mature trees. These provide enclosure and priority habitat which supports local wildlife.</p> <p>Adjoining land to the north and northwest is in the same ownership and is predominantly in the flood zone. This wider area may present an opportunity for delivery of public open space, community agriculture and/or biodiversity enhancement.</p>

							<p>Landscape and Environmental Management Plan</p> <p>External lighting and glazing must be compatible with Strategic Policy 2.5 Protecting Tranquillity and Dark Night Skies</p> <p>Consider use of mature trees at the field entrance and on the southern border to create a landscaped public greenspace focal point.</p>
Land in Mary Tavy	7.23	-	0		SP1.1, SP1.2, SP1.6, SP2.1, SP2.5	There are some mature trees, hedgerows and grassed area in the west of the site.	<p>Site has frontage along main road (A386) presents opportunity to improve the local streetscape.</p> <p>Landscape and Environmental Management Plan</p> <p>External lighting and glazing must be compatible with Strategic Policy 2.5 Protecting tranquillity and dark night skies</p> <p>The site is highly visible from the A386 and landscaping, layout and architectural details should seek to create a high quality addition to the town.</p>
Moretonhampstead							
Land at Betton Way	7.10	-	0		SP1.1, SP1.2, SP1.6, SP2.1, SP2.5	<p>The site's boundaries include several mature trees and mature hedgerows which support local wildlife. Opportunity to introduce new tree and hedge landscaping which will support biodiversity.</p> <p>Strong streetscape along Betton Way which can be reinforced through sensitive development.</p>	<p>Landscape and Environmental Management Plan</p> <p>External lighting and glazing must be compatible with Strategic Policy 2.5 Protecting tranquillity and dark night skies</p> <p>Careful consideration of outward facing homes along Betton Way to reinforce streetscape.</p> <p>An element of custom/self build should be integrated within a strong design-led layout.</p>
Land at Forder Farm	7.11	-	0		SP1.1, SP1.2, SP1.6, SP2.1, SP2.5	Hedgerows and some mature trees which support biodiversity and provide screening are present along some boundaries.	<p>Landscape and Environmental Management Plan</p> <p>External lighting and glazing must be compatible with Strategic Policy 2.5 Protecting tranquillity and dark night skies</p>

						Largely level with gentle slope across the site.	<p>Introduce new landscaping to provide biodiversity enhancements.</p> <p>Development along Betton Way and Ford Street should enhance streetscape</p>
Land at Thompsons	7.12	+	+	Development of this site should: c) include landscaping to the south and east of the site	SP1.1, SP1.2, SP1.6, SP2.1, SP2.5		<p>Potential for high quality design and landscaping to enhance the streetscape and provide a gateway development for the town. Mature Oak tree can be retained to provide a landmark/feature</p> <p>Site is not prominent in the landscape and no landscape designations, though existing buildings prominent and site adjoins the Wray Valley multi-use Trail</p> <p>Landscape and Environmental Management Plan</p> <p>External lighting and glazing must be compatible with Strategic Policy 2.5 Protecting tranquillity and dark night skies</p> <p>Layout and landscaping should seek to minimise the visual impact of the large commercial buildings adjacent on future residents' amenity.</p>
South Brent							
Land West of Palstone Lane (a, north)	7.14	-?	0		SP1.1, SP1.2, SP1.6, SP2.1, SP2.5	<p>Open to some views from the east and south</p> <p>No landscape designations though somewhat visible from the east and south.</p> <p>The site's western and southern boundary is open the remainder of the field. Boundary to north and east are hedgerows, and along the south is an open boundary to the rest of the agricultural field.</p>	<p>Landscape and Environmental Management Plan</p> <p>External lighting and glazing must be compatible with Strategic Policy 2.5 (1) Protecting tranquillity and dark night skies</p> <p>Landscaping to soften the urban edge and enclose where development adjoins open parts of the field.</p>
Land West of Palstone Lane (b, south)	7.15	-?	0		SP1.1, SP1.2, SP1.6, SP2.1, SP2.5	Open to some views from the east and south.	Landscape and Environmental Management Plan

					<p>No landscape designations though somewhat visible from the east and south.</p> <p>The site's western boundary includes mature hedgerows and mature trees. These provide enclosure and priority habitats which supports local wildlife. Boundary to north and east is open to that portion of the field (allocated as Palstone (a)), and along the south is an open boundary to the rest of the agricultural field.</p>	<p>External lighting and glazing must be compatible with Strategic Policy 2.5 Protecting Tranquillity and Dark Night Skies.</p> <p>Landscaping to soften the urban edge and enclose where development adjoins open parts of the field.</p>
Land South of Fairfield (Phase 2)	7.16	0	0		SP1.1, SP1.2, SP1.6, SP2.1, SP2.5 Site is enclosed by residential development to the north, west and south and landscaping.	<p>Landscape and Environmental Management Plan</p> <p>External lighting and glazing must be compatible with Strategic Policy 2.5 Protecting Tranquillity and Dark Night Skies</p>
Yelverton						
Land at Elfordtown Farm	7.18	-	-		<p>SP1.1, SP1.2, SP1.6, SP2.1, SP2.5</p> <p>Mature trees along Meavy Lane are important for amenity and ecology</p> <p>The site is bounded to east and west by established hedgerows and mature trees. Northern & southern hedge boundaries are largely non-native presenting opportunity to enhance biodiversity</p> <p>Visually forms part of the settlement; few neighbouring properties with plenty of scope to preserve amenity</p>	<p>Landscape and Environmental Management Plan</p> <p>External lighting and glazing must be compatible with Strategic Policy 2.5 (2) Protecting tranquillity and dark night skies</p> <p>Near to the historic farmstead so layout and architectural detail needs to respect the rural agricultural vernacular and preserve the setting of the farm.</p> <p>Landscaping along northern boundary should consider neighbouring amenity.</p> <p>Principle vehicle access, either off Elford Park or from Elfordtown Farm Drive, should ensure pedestrian safety and priority, should provide an attractive and legible entrance, and minimise the need to remove veteran trees along Meavy Lane.</p>

Land at Binkham Hill	7.19	-	0	Development of this site should: a. include landscaping to the south and east of the site;	SP1.1, SP1.2, SP1.6, SP2.1, SP2.5	<p>Visible via distant views from the north Several mature trees along Dousland Road which contribute to the streetscape</p> <p>The western boundary of the site, along Dousland Road, has a number of mature trees which make a strong contribution to the immediate landscape.</p>	<p>The current urban edge of Yelverton along the southwest boundary is prominent; opportunity to soften the urban edge through landscaping or design/layout to provide better outlook when viewed from the moors to the north</p> <p>Landscape and Environmental Management Plan</p> <p>Arboricultural survey with identification of root protection areas and any trees or hedges to be removed.</p> <p>External lighting and glazing must be compatible with Strategic Policy 2.5 Protecting Tranquillity and Dark Night Skies</p> <p>As the site gently slopes down to the north opportunity to vary building heights could be considered in order to maximise solar gain opportunities and minimise impact on the skyline/distant views as well as visual impact on no. 14-21 Binkham Hill.</p> <p>Landscaping to minimise visual impact particularly in the south/south-east of the site; consider lower density to soften the urban edge of Yelverton as currently viewed.</p> <p>Landscaping to soften the urban edge and enclose where development adjoins open parts of the field.</p>
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