24 July 2020

Mrs Alison Bell Major Casework Team The Planning Inspectorate

By email only to <u>Alison.bell@planninginspectorate.gov.uk</u>

Dear Mrs Bell



APP/F1610/W/20/3248674 - Scrap Haulage Yard, Gilder, Fosseway, Lower Slaughter, Gloucestershire GL54 2EY

Thank you for allowing the Cotswolds Conservation Board ('the Board') to submit comments on the above planning appeal.

The Board is against the appeal proposals and we recommend that the appeal should be dismissed. We support the reasons given by Cotswold District Council for refusing planning permission for planning application 18/01681/FUL, as stated in their decision notice dated 13 November 2019. In particular, we agree that 'the proposed development will result in an over-provision of [electric vehicle charging] infrastructure at an unsustainable location'.

The Board is also against the appeal proposals because we consider that the proposed development would, on balance, have a moderately significant adverse impact on the purpose of conserving and enhancing the natural beauty of the Cotswolds Area of Outstanding Natural Beauty (AONB), in which the proposed development is located.

Over-provision of electric vehicle charging infrastructure

It is important to note that the Board supports the provision of charging points for electric cars as a key mechanism to mitigate the impacts of climate change, as indicated in Policy CC7 of the Cotswolds AONB Management Plan 2018-2023.

However, in this instance, we consider that the provision of 104 parking / charging spaces is excessive and is not consistent with the national planning policy requirement for the scale and extent of development in AONBs to be limited. In addition, we are very doubtful that the scheme would actually deliver many of the potential benefits that are inferred in the applicant's supporting information.

We consider that the perceived need for the development is outweighed by its likely adverse impacts on the Cotswolds AONB.

Adverse impacts on the Cotswolds AONB

The Board has assessed the proposed development both in comparison to the current land use and in its own right, in terms of the extent to which the proposed development is compatible with the purpose of AONB designation.

We recognise that the existing land use as a scrap yard is out of character with the surrounding AONB rural landscape. However, the more incongruous aspects of this land use are currently well screened by the large Leylandii hedge / trees along the western boundary. Although Leylandii are not characteristic of the local AONB landscape, the screening that they provide in this location does help to maintain the impression of a relatively rural landscape, especially as perceived by users of the Fosse Way when they are

Conserving, enhancing, understanding and enjoying the Cotswolds Area of Outstanding Natural Beauty

passing at some speed. Furthermore, the potential benefits of removing the uncharacteristic Leylandii are outweighed by the peri-urban nature of the views that would be opened up.

Overall, the Board considers that the proposed development would have a moderate adverse effect on landscape character.

The Board considers that that impacts on tranquillity, for example, with regards to traffic movements, are likely to be relatively minor (depending on the extent to which electric car users would specifically travel to the site to charge their cars, as opposed to charging their cars whilst they are en-route to other destinations). However, we are concerned that the impacts of light pollution could be at least moderately significant.

The Board considers that visual impacts would be relatively limited. For example, although the magnitude of visual effect would be probably be moderate for receptors on the Fosse Way, the sensitivity of these receptors would be low, so the overall significance of visual effects for these receptors would only be 'minor-moderate' adverse. The most significant adverse visual effect would be for receptors on the footpath on the opposite side of the Fosse Way. For receptors on other Public Rights of Way, the significance of the visual effects is likely to be negligible due to the intervening vegetation, buildings and / or distance.

Further information relating to the Board's comments is provided in Annex 1 and 2, below.

If you have any queries regarding the Board's response, please do not hesitate to get in touch.

Yours sincerely,

John Mills MRTPI Planning and Landscape Officer

Tel: 07808 391227 Email: john.mills@cotswoldsaonb.org.uk

ANNEX 1. ADDITIONAL INFORMATION RELATING TO THE COTSWOLDS CONSERVATION BOARD'S COMMENTS ON PLANNING APPEAL APP/F1610/W/20/3248674

POTENTIAL IMPACTS

Landscape and visual impacts

The Board acknowledges the statement in the District Council's Committee Report that:

• The site has an industrial character and the existing scrap yard and haulage depot business generates a level of noise and activity which is out of character from the surrounding AONB rural landscape. Therefore, in landscape terms there is no 'in principle' objection to the re-development of the site to provide an electric car charging service station.

However, whilst there might be no 'in principle' objection, this does not necessarily mean that the proposed scheme would not have adverse landscape and visual impacts.

Weighing up the beneficial and adverse effects of the proposed development is a complex issue. This is because the proposed development needs to be assessed both in comparison to the existing land use and in terms of its own compatibility with the key landscape characteristics and special qualities of this section of the AONB. The Board is very disappointed that the applicant has not provided a more comprehensive assessment of the potential landscape and visual impacts of the proposed development.

In the absence of such an assessment, the Board has undertaken its own 'summary' landscape and visual appraisal, in order to tease out the overall balance of adverse and beneficial effects in relation to the purpose of conserving and enhancing the natural beauty of the Cotswolds AONB. This assessment is shown in Annex 2.

Key features / characteristics and special qualities

The District Council's Committee Report correctly identifies that the proposed development is located in Landscape Character Area 17A (Pastoral Lowland Vale: Vale of Bourton), as defined in the Cotswolds AONB Landscape Character Assessment.¹ The Cotswolds AONB Landscape Character Assessment and the Cotswolds AONB Landscape Strategy & Guidelines² identify a number of key features / characteristics for the Pastoral Lowland Vale. The relevant key features / characteristics for the first part of the Board's assessment (Table 1 in Annex 2).

The 'special qualities' of the Cotswolds AONB are listed in Chapter 2 of the Cotswolds AONB Management Plan 2018-2023.³ The AONB's special qualities are those aspects of the area's natural beauty which make the area distinctive and which are valuable, especially at a national scale. They are also the key attributes on which the priorities for its conservation, enhancement and management should be based. The potential impacts of the proposed development on relevant special qualities are assessed in Table 2 of Annex 2.

¹ <u>https://www.cotswoldsaonb.org.uk/our-landscape/landscape-character-assessment/</u>

² <u>https://www.cotswoldsaonb.org.uk/our-landscape/landscape-strategy-guidelines/</u>

³ https://www.cotswoldsaonb.org.uk/wp-content/uploads/2018/12/Management-Plan-2018-23.pdf

As identified in the assessments shown in Annex 2, the proposed development provides a number of potential beneficial and adverse effects. For example, taking out the Leylandii hedge and replacing it with native species hedging would, in theory, be more in keeping with the local landscape character. The removal of the Leylandii also potentially opens up views to the east, towards the Farmed Slopes that rise up to Rissington Plateau.

However, it is the Board's opinion that these potential beneficial effects are outweighed by the potential adverse effects. In particular, the views that would be opened up by the removal of the Leylandii would reveal a peri-urban environment, including the proposed car park and service station and the Builders Merchants. The buildings in this locality would, in effect, create the impression of a continuous 'wall' of built development extending the whole length of the opened up view, from the Wyck Bridge Barn buildings at the north end, heading southwards to The Grafters and beyond. This wall of built development would obscure the views from the Fosse Way towards the more rural, pastoral landscape further east.

Overall, the Board considers that the net balance of adverse and beneficial effects would be 'moderate adverse'.

Tranquillity

The relative tranquillity of the Cotswolds AONB is one of the AONB's 'special qualities'. Policy CE4 (Tranquillity) of the Cotswolds AONB Management Plan states that measures should be taken to avoid and minimise new sources of noise pollution and other aural and visual disturbance. It also states that measures should be taken to remove and reduce existing sources of noise pollution and other aural and visual disturbance.

Noise

The Board agrees with the findings of the committee report that:

 Considering the existing use of the land, which is likely to generate significant noise levels, the proposed development is likely to be acceptable having regard to its proposed usage.

Assuming that an appropriate closing time (e.g. 7pm - 7am) is imposed as a planning condition, the Board has no particular concerns relating to the noise that would be generated by the development.

Traffic flow

The Board's Tranquillity Position Statement⁴ indicates that, as a rule-of-thumb, an increase in traffic flows of 10% or more would be significant issue, with regards to the relative tranquillity of the AONB.

The applicant has indicated that the site will result in a maximum of 204 vehicle movements per hour, on a main road that, according to the District Council's Committee Report, generates average work day traffic of circa 14,000 vehicles. However, the Board assumes that the vast majority of vehicles that use the site would be travelling on the Fosse Way and / or visiting Bourton-on-the-Water anyway, even if the electric car charging service station wasn't present.

⁴ <u>https://www.cotswoldsaonb.org.uk/wp-content/uploads/2019/06/Tranquillity-Position-Statement-</u> <u>FINAL-June-2019.pdf</u>

If this is the case, then the Board would not anticipate a significant net-increase in traffic flow on the Fosse Way. However, this would depend on the extent to which electric car users would specifically travel to the site to charge their cars, as opposed to charging their cars whilst they are en-route to other destinations.

Reflection of sunlight off surfaces

The proposed development would include a lot of potentially reflective surfacing, including solar panels on the roof of the service station building and the solar road surface. The reflection of sunlight off such surfaces can be visually intrusive and adversely affect tranquillity. As stated in Section 5.2 of the Board's Tranquillity Position Statement, we recommend that measures should be taken to avoid or minimise the reflection of sunlight off such surfaces.

Overall, the Board does not consider that the proposed development would have a significant adverse effect on the tranquillity of the Cotswolds AONB in this locality.

Impact on dark skies

The dark skies of the Cotswolds AONB are one of the AONB's 'special qualities'. Policy CE5 (Dark Skies) of the Cotswolds AONB Management Plan states that measures should be taken to avoid and minimise new sources of light pollution. It also states that measures should be taken to remove and reduce existing sources of light pollution.

The proposed removal of the Leylandii on the boundary adjacent to the Fosse Way would mean the lighting associated with the development would be much more visible to users of the Fosse Way than is currently the case. This is a significant concern for the Board.

The applicant has indicated that 25W LED bollard type units, with an output of 1875 lumens, would be used within the carpark and LED mounted down lighters are proposed to the ramp. The Board agrees with the statement in the committee report that 'the use of low level lighting is welcomed'.

However, the picture of the proposed bollards does not make clear the extent to which the lighting will be directed downwards. It looks as if some of the light might be projected horizontally, or even upwards, from the light source on the vertical bollard. A more appropriate type of lighting might be provided by the type of bollard shown in the images below, where the lighting shines down from a horizontal light source:



It is not clear from the applicant's Lighting Strategy exactly how many of the bollards and down lights would be installed. From the Lighting Strategy diagram, it looks like there would be a total of approximately 48 bollards and seven down lights, with the majority of these located close to the proposed services building and pedestrian walkways. It looks like there would be no lighting by the individual parking bays.

It would have been useful if the applicant could have provided an explicit comparison of the existing and proposed lighting with the obtrusive light limitations that are specified in Table 2 of the Institute of Lighting Professionals' 'Guidance Notes for the Reduction of Obtrusive Lighting'.⁵

Without such an assessment to prove otherwise, the Board considers that the proposed development could potentially have a moderate adverse effect.

If the development is permitted, we recommend that a planning condition is imposed which specifies the selection of lighting which most effectively directs the light downwards. We also recommend that an appropriate cut-off time (e.g. 7pm - 7am) is imposed for lighting on the site.

Visual impact

The Board's assessment of potential visual impacts is provided in Table 3 of Annex 2.

The largest number of receptors that would see the proposed development would be users of the Fosse Way. As outlined above, in relation to landscape character, the magnitude of visual effect of the proposed development would probably be medium / moderate. However, given that these receptors would mainly be travelling at speed and not focussed on views across the site, their sensitivity to the specific change would be low. Therefore, the overall significance of visual effects for these users would be 'minor-moderate' adverse.

As indicated in Table 3, visual effects would actually be most significant for receptors on Lower Slaughter Footpath 11, on the opposite (western) side of the Fosse Way.

Visual effects for most other receptors on most other Public Rights of Way would probably be negligible because of intervening vegetation and / or buildings and, in some instances, the distance involved.

NEED

The Board strongly supports the principle of providing charging points for electric cars in the Cotswolds AONB. This issue is explicitly addressed in Policy CC7 (Climate Change – Mitigation) of the Cotswolds AONB Management Plan 2018-2023, which states:

• Greenhouse gas emissions should be reduced through a range of measures including ... providing a network of charging points across the AONB for electric cars.

However, the Board considers that the provision of 104 such charging points in one location within the AONB seems very excessive. The Board supports the statement in the District Council's Decision Notice that the proposed development '*over-provides electric vehicle charging infrastructure*'. This scale of provision would not be consistent with the requirements of paragraph 172 of the National Planning Policy Framework, which states that the scale and extent of development in AONBs should be limited.

The Board is particularly concerned that the applicant's supporting information implies a scenario for how the site would operate which bears no resemblance to the actual planning

⁵ <u>https://www.cotswoldsaonb.org.uk/wp-content/uploads/2019/03/Dark-Skies-Artificial-Light-Appendix-B-ILP-Guidance-Notes-For-the-reduction-of-Obtrusive-Light.pdf</u>

application that has been submitted. For example, the supporting information makes great play of users being able to leave their cars to be re-charged⁶ whilst they are whisked off to Bourton-on-the-Water and other destinations on electric buses,^{7,8} from a park and ride facility.⁹ Whilst these features might become a reality at some point in the future they do not form part of the planning application. As such, they should be given little, if any, weight.

In reality, the planning application does not provide a park and ride facility and does not include the provision of additional buses, electric or otherwise, over and above the existing bus network provision. Instead, users are likely to be stranded for up to 5 hours between buses on weekdays and Saturdays and potentially have no buses on Sundays, when recreational use will be in most demand.¹⁰

This leave the users of the site who want to visit Bourton-on-the-Water with three choices:

- 1. Walking into Bourton along the Fosse Way (and potentially through the Industrial Park), which would be a 4.8km round trip. This would probably be too far to walk for many casual visitors.
- 2. Hiring a bicycle on the site and cycling along the very busy Fosse Way. Having to cycle along the Fosse Way would probably be off-putting for many casual visitors.
- 3. Booking a taxi, many of which would use petrol or diesel for many years to come, which would add to the potential congestion on the site and add to greenhouse gas emissions. These additional greenhouse gas emissions would undermine some of the potential benefits of having the charging point.

None of these options seem particularly desirable, especially from the perspective of a casual visitor. As such, the Board considers that it is highly unlikely that the development would be a suitable hub for visiting Bourton-on-the-Water and other nearby destinations.

The applicant's Planning Statement (paragraph 12.3) also indicates that the site could be used by local people who could leave their cars charging at the site whilst they work. However, the number of work places within the immediate vicinity is very limited. Work premises at Bourton Industrial Park would be approximately 1-1.5km away (2-3km round trip). Most of these premises have sizeable car parks which, in the near future, could potentially host multiple charging points. As such, it is highly unlikely that this scenario would actually become reality.

For these reasons, the Board considers that it is unlikely that that the site would be used for long-stay car parking (as suggested in paragraph 12.4 of the applicant's Planning Statement). Instead, it is likely that it would be primarily used by people who want to charge their vehicles for a very limited period of time before moving on. This very limited charging time would undermine many of the potential benefits of the site.

⁶ Planning Statement, paragraphs 12.2 and 15.3.

⁷ Planning Statement, paragraph 10.5.

⁸ Planning Statement, paragraph 10.7.

⁹ Planning Statement, paragraph 12.8.

¹⁰ A review of bus times on google.com shows that, in July 2020, there would be just six or seven buses each way midweek, with nearly a five hour gap between approximately 10am and 3pm. On Saturdays there would be just four buses each way and on Sundays there would be no bus service. Although this may represent a reduced bus service as a result of current coronavirus measures, it gives a clear indication of the very limited extent to which users of the car park would be able to rely on the existing bus network to transport them to their desired destination. With no buses after 7pm in the evening, a closing time of 7pm would potentially be more appropriate than 9pm.

The potential benefits would be further, significantly undermined by allowing petrol and diesel cars to use the facility, as outlined in paragraph 12.8 of the applicant's Position Statement.

Section 13 of the applicant's Planning Statement is titled 'Local Support' but it only identifies a limited number of examples of explicit support. It is also misleading. For example, it indicates that the Local Parliamentary Representative provided a supportive response. However, the Board is aware that the local MP, Sir Geoffrey Clifton-Brown, actually strongly objects to the proposed development.

ANNEX 2. ASSESSMENT OF IMPACTS WITH REGARDS TO KEY FEATURES AND SPECIAL QUALITIES

 Table 1. Assessment of potential impacts on the relevant key features / characteristics of Landscape Character Type 17 (Pastoral Lowland Vale)

Relevant key features (LCT 17)	Current Baseline	Proposed development	Net effect, compared to current baseline.	Compatible with landscape character key features and / or purpose of AONB designation?	Potential conditions if planning permission granted
Network of hedgerows with intermittent hedgerow trees and occasional dry stone walls	The western boundary of the site, along the Fosse Way, is currently a tall, thick coniferous hedge. Leylandii hedges / trees are not a desirable feature in this landscape.	Coniferous hedge removed. Construction of a concrete block wall with facing natural local stone wall along the site boundary – New native species hedging planted against the wall. The native species hedging and local stone wall would be more in keeping with the local landscape character than a large Leylandii hedge. However, the proposed wall is not a traditional Cotswold dry stone wall and should not be considered as such. The combination of both hedging and walling is also not characteristic.	Minor beneficial.	Yes, although a proper Cotswold dry stone wall along the boundary would be preferable.	Additional native species hedging along the boundary with Bence Builders Merchants to enhance landscape character and biodiversity and to reduce adverse visual effects. New boundary wall created as a traditional Cotswold dry stone wall. Stone to be sourced from quarries within the Cotswolds AONB within, say, a 15km radius.

	Additional native species hedging along the boundary with the Builders Merchants would be beneficial form a landscape, visual and biodiversity perspective.			
The current land use is highly incompatible with this key feature. However, the Leylandii hedge does help to hide the industrial use of the site and, in doing so, helps to maintain the impression of a relatively rural character (at least with regards to users of the Fosse Way, passing the site at high speeds).	The proposed land use is not compatible with this key feature. However, purely in terms of land use, it is arguably less incompatible than the current land use. The removal of the Leylandii would potentially open up views for users of the Fosse Way. However, rather than opening up views of the rural, pastoral vale, the foreground views looking east from the Fosse Way would be dominated by a semi-urban environment consisting of the large car park and a seemingly continuous 'wall' of built development consisting of the Wyck Bridge Barn buildings, Bence Builders Merchants, the proposed service station and The Grafters. These would potentially obscure – and distract attention from - the more rural landscape further east. Overall, the development would result in a perceived increased level of urbanisation, compared to the current baseline, for users of the Fosse Way.	Moderate adverse.	No	Mitigation screening (e.g. native species hedge / trees) along the boundary with Bence Builders Merchants. Consider revising the scheme to provide a single story building that isn't visible above the proposed boundary wall.
See comments above.	See comments above. In theory, the removal of the Leylandii hedge would open up views towards the defining	Minor adverse.	No	
	highly incompatible with this key feature. However, the Leylandii hedge does help to hide the industrial use of the site and, in doing so, helps to maintain the impression of a relatively rural character (at least with regards to users of the Fosse Way, passing the site at high speeds).	boundary with the Builders Merchants would be beneficial form a landscape, visual and biodiversity perspective.The current land use is highly incompatible with this key feature.The proposed land use is not compatible with this key feature. However, purely in terms of land use, it is arguably less incompatible than the current land use.However, the Leylandii hedge does help to hide the industrial use of the site and, in doing so, helps to maintain the impression of a relatively rural character (at least with regards to users of the Site at high speeds).The removal of the Leylandii would potentially open up views for users of the Fosse Way would be dominated by a semi-urban environment consisting of the large car park and a seemingly continuous 'wall' of built development consisting of the Wyck Bridge Barn buildings, Bence Builders Merchants, the proposed service station and The Grafters. These would potentially obscure – and distract attention from - the more rural landscape further east.Overall, the development would result in a perceived increased level of urbanisation, compared to the current baseline, for users of the Fosse Way.See comments above.See comments above.	boundary with the Builders Merchants would be beneficial form a landscape, visual and biodiversity perspective.Moderate adverse.The current land use is highly incompatible with this key feature.The proposed land use is not compatible with this key feature. However, purely in terms of land use, it is arguably less incompatible than the current land use.Moderate adverse.However, the Leylandii hedge does help to hide the industrial use of the site and, in doing so, helps to maintain the impression of a relatively rural character (at least with regards to users of the Fosse Way, passing the site at high speeds).The removal of the Leylandii would potentially open up views for users of the Fosse Way would be dominated by a semi-urban environment consisting of the large car park and a seemingly continuous 'wall' of built development consisting of the Wyck Bridge Barn buildings, Bence Builders Merchants, the proposed service station and The Grafters. These would potentially obscure – and distract attention from - the more rural landscape further east.Overall, the development would result in a perceived increased level of urbanisation, compared to the current baseline, for users of the Fosse Way.See comments above.See comments above.	boundary with the Builders Merchants would be beneficial form a landscape, visual and biodiversity perspective.Moderate adverse.The current land use is highly incompatible with this key feature.The proposed land use is not compatible with this key feature. However, purely in terms of land use, it is arguably less incompatible than the current land use.Moderate adverse.However, the Leylandii hedge does help to hide the industrial use of the site and, in doing so,

		 Farmed Slopes, rising up to Rissington Plateau to the east. However, this would be undermined and potentially obscured by the built environment in the foreground. In addition, it is not clear the extent to which the proposed boundary wall (or the proposed boundary hedge, once well established) would block views to the Farmed Slopes. For example, the site elevations (e.g. north elevation) seem to indicate that wall would be above eye level, for car users on the Fosse Way, in the vicinity of the proposed service station. 			
Generally human scale intimate	See comments above.	See comments above.	Minor adverse.	Neutral	
landscape, but with intermittent open expansive character and expansive views in some areas.	The Leylandii hedge blocks off views of the landscape, rather than contributing to the perception of a human scale intimate landscape.	Although the removal of the Leylandii hedge could, in theory, open up expansive views to the east, the combination of the buildings, proposed boundary wall and proposed boundary hedge would undermine much of this potential beneficial effect.			

Overall balance = moderate negative

Relevant special quality	Current baseline	Proposed development	Net effect	Compatible with purpose of AONB designation?	Potential conditions if planning permission granted
Unifying character of the limestone geology	No visible presence (from the Fosse Way) of limestone being used as a building material.	 Natural local stone used in the proposed boundary wall and in the service station building. However, this would be undermined to some degree by the monolithic appearance of the proposed service station building and lack of vernacular architecture, especially when seen from the Fosse Way. Also, it is worth noting that the introduction of a new building – even one built of natural local stone – does not necessarily provide a more beneficial effect than if this building was not introduced into, and / or visible in, the landscape. In landscape terms, it may be better to just have a single story building that does not protrude above the proposed boundary wall. This would reduce the number of car parking spaces. However, as discussed elsewhere, the number of parking space is probably excessive. 	Neutral.	Neutral	Have a single storey building that does no protrude above the proposed boundary wall / hedge (and provide a reduced number of parking spaces to make space for the single storey, ground-level building.
Distinctive dry stone walls.	No visible presence (from the Fosse Way) of dry stone walls.	Construction of a concrete block wall with facing natural local stone wall along the site boundary.	Minor adverse.	N	Specify that the boundary wall be built as a traditional dry stone wall.

Table 2. Assessment of potential impacts on the relevant special qualities of the Cotswolds AONB

		However, the proposed wall is not a traditional Cotswold dry stone wall and should not be considered as such.	Minor	Y	
Variations in the colour of the stone from one part of the AONB to another	No visible presence (from the Fosse Way) of limestone being used as a building material.	The applicant's information indicates that local stone would be used, so the colour is likely to be in keeping with this part of the AONB.	Minor beneficial	Y	Specify that the stone for the building and the walls should be sourced from quarries in the Cotswolds AONB within, say, a 15km radius.
Cotswold vernacular, high architectural quality and integrity.	No visible presence of Cotswold vernacular architecture.	When seen from the Fosse Way, the service station building would be seen as a windowless, monolithic structure few, if any, features that reflect the local Cotswold vernacular.	Minor adverse.	N	
The tranquillity of the area – noise.	Scrap yard and haulage use likely to cause significant noise levels, although this noise is mitigated to some degree by the screening provided by the coniferous hedge and masked, to some degree, by the traffic noise on the Fosse Way.	Noise would be fairly limited. Adverse effects resulting from noise could be reduced by	Minor beneficial	Y	Restrict operating hours (e.g. 7am to 7pm).
The tranquillity of the area – traffic flow.	Traffic flows relating to the current use do not appear to have been assessed.	Whilst there would be significant traffic movements associated with the proposed use, it is presumed that the vast majority of these users would already be using the Fosse Way so the net-increase in traffic flows on the Fosse Way would be negligible.	Minor adverse.	N	

		Cars turning into / out of the car park could potentially cause some congestion, creating some aural and visual disturbance.		
Dark sky areas.	The current levels of lighting / light pollution from the existing land use, including the hours when lighting is permitted, do not appear to have been assessed. The coniferous hedge would mitigate some of this lighting.	The proposed use would involve a considerable amount of lighting, albeit with this lighting being directed downwards. The new boundary wall would provide relatively little screening compared to the current coniferous hedge.	Moderate to significant adverse (difficult to predict without an assess- ment).	Restrict operating hours (e.g. 7am to 7pm). Specify the type of lighting to be used, in line with guidance published by the Institution of Lighting Engineers and The Commission for Dark Skies. The proposed development should, ideally, be assessed against – and required to comply with - the obtrusive light limitations set out in guidance published by the Institution of Lighting Professionals

Overall balance = moderate adverse

Table 3. Assessment of potential visual impacts

N.B. Assessment not based on a site visit - just based on a desk-top study using OS maps (on Defra Magic website) and Google Earth

Road / Public Right of Way	Location	Sensitivity of visual receptor	Magnitude of Visual Effect	Significance of visual effect	Comments
Fosse Way	Adjacent to the western boundary.	Low	Medium adverse	Minor – moderate adverse	See comments in Table 1 relating to the removal of the Leylandii and the resulting opening up of views from the Fosse Way looking east.
					Receptors would mainly be in motor vehicles. These receptors would be passing at high speed with views to and across the site only being seen for a few seconds.
Lower Slaughter Footpath 11	On opposite side of Fosse Way a few metres away.	Medium	Medium adverse	Moderate adverse	See comments in Table 1 relating to the removal of the Leylandii and the resulting opening up of views from the Fosse Way looking east.
Monarch's Way / Gloucestershire Way (Lower Slaughter Footpath 4)	@ 820m WNW	High	Negligible	Negligible	Similar elevation. At that distance and elevation, the site would probably be obscured by intervening vegetation (even with the Leylandii removed).

Lower Slaughter	@300m SSE	Medium	Negligible	Negligible	Similar elevation. At that
Bridleway 12					distance and elevation, the
					site would probably be
					obscured by intervening
					vegetation and buildings.
Diamond Way	@1.8km east, near	High	Negligible	Negligible	@25m higher elevation but
(Wyck Rissington	The Grove				view of proposed
Bridleway 5)					development site obscured
					by buildings immediately to
					the east of the site.
Other footpaths to	Various	Medium	Negligible	Negligible	Similar (or slightly higher)
the east					elevations. View of site
					would be obscured by
					intervening vegetation and
					buildings.