

31st May 2019

Neil Hempstead
Senior Planning Officer
Planning Services
Stratford on Avon District Council



By email to Neil.Hempstead@stratford-dc.gov.uk

Dear Neil

18/01892/FUL. Outline application for a phased development comprising 3,100 dwellings, etc. Long Marston Airfield, Campden Road, Lower Quinton, Stratford-upon-Avon CV37 8LL

Thank you for consulting the Cotswolds Conservation Board ('the Board') on the above planning application. The Board **OBJECTS** to the proposed development.

The Board's primary consideration in responding to this planning application is the potential impact of the proposed development on the Boards two statutory purposes:

1. To conserve and enhance the natural beauty of the Cotswolds Area of Outstanding Natural Beauty (AONB).
2. To increase the understanding and enjoyment of the special qualities of the Cotswolds AONB.

With this in mind, the Board's objections relate to two key issues:

- i) Landscape and Visual Impacts.
- ii) Impacts on the Tranquillity of the Cotswolds AONB.

The Board is concerned that the landscape and visual impacts of the proposed development have not been adequately addressed, particularly in relation to the views from Meon Hill. The Board makes the following recommendations in relation to landscape and visual impact:

- The applicant should be required to:
 - address the recommendations of the Landscape and Visual Impact Assessment (LVIA) Review;
 - use larger photographs in the LVIA;
 - provide visualisations (i.e. photomontages) for the Meon Hill viewpoints;
 - re-assess the visual impacts of the proposed development, in relation to the Meon Hill viewpoints
- If, following this re-assessment, the overall effect on the AONB is shown to be significant, then the proposed development will need to be reviewed to see how this adverse impact can be further reduced and minimised.

With regards to tranquillity, the Board is concerned that the proposed development will generate a significant increase in the number of vehicle movements in the Cotswolds AONB, which, in turn, will have an adverse effect on the tranquillity of the AONB. This issue has not

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been adequately addressed in the planning application. The Board makes the following recommendations in relation to tranquillity:

- The applicant should be required to:
 - undertake further assessment and analysis of the traffic-related impacts on the Cotswolds AONB;
 - clearly identify the proposed transport-related mitigation, specifically in relation to the Cotswolds AONB, including the provision of viable and realistic alternatives to private car use.

Further information is provided in Annex 1, below.

If you have any queries regarding this response, please don't hesitate to contact me.

Yours sincerely

A handwritten signature in black ink that reads "John Mills". The signature is written in a cursive style with a long, sweeping underline.

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

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ANNEX 1. Further information in support of the Cotswolds Conservation Board's response to planning application 18/01982/FUL

Landscape and Visual Impact

The Board is concerned that the landscape and visual impacts of the proposed development, particularly in relation to the Cotswolds AONB, have not been adequately addressed. Of particular relevance to the AONB are the two viewpoints within the AONB that have been included in the applicant's Landscape and Visual Impact Assessment (LVIA) (i.e. viewpoints B4 / 26 and B5 / 27).

The views from the Cotswold escarpment (and by extension, the escarpment outliers, such as Meon Hill) are one of the 'special qualities' of the Cotswolds AONB. In other words, these views are one of the features of the Cotswolds that makes the area so outstanding that it is in the nation's interest to safeguard it. As such, the potential impact of the proposed development on these views should be closely scrutinised.

As outlined in the LVIA Review, undertaken by White Consultants for Stratford-on-Avon District Council, the LVIA potentially understates the level of effect / significance and is not transparent on how these levels have been arrived at. The LVIA Review makes a number of recommendations regarding further information that is required in order to fully assess the landscape and visual impact of the proposed development:

- Addition of the lateral extent of the development (including core) to photographs.
- Judgement on sensitivity and magnitude of effect for visual receptors.
- Judgement on sensitivity for landscape receptors.

The Board is aware that the local planning authority (LPA) has asked the applicant to address these recommendations.

The Board supports the conclusions and recommendations of the LVIA and the requirement for the applicant to address these recommendations. In particular, the Board agrees with the recommendation that the LVIA photographs should show the lateral extent of the proposed development (including core).

The LVIA Review highlights that the LVIA photographs tend to make the development appear further away than it would in reality. To address this issue, particularly in relation to the two AONB viewpoints, **the Board recommends that the applicant should be required to use larger photographs in the LVIA.** In addition to using photographs from a camera with a 50mm focal length lens, the LVIA should also include photographs from a camera using a larger focal length lens (e.g. 200mm). This would help to provide a more realistic indication of how the site of the proposed development would actually appear from the two AONB viewpoints.

Having visited the two AONB viewpoints, the Board considers it to be very difficult to visualise what the 3,100 dwellings, 5.7ha business park, two primary schools, secondary school and all of the associated infrastructure, including buildings that could be up to 16m high and covering a total area of over 200ha – plus the 400 dwellings and 4,000m² employment hub that have already been permitted - would actually look like from these elevated viewpoints. This is especially challenging when the current baseline is a much less developed, flat airfield with scattered buildings of various sizes. The Board therefore questions the extent to which the applicant's LVIA can accurately conclude that the effect of the development, in relation to these two viewpoints, would be minor adverse / negligible.

The LVIA asserts that the proposed green infrastructure (GI) associated with the development would help to assimilate the built form into its surrounding context, softening and filtering its appearance. However, viewpoint B4 / 26 is approximately 55m higher than the airfield (i.e. approximately 100m above ordnance datum (AOD) compared to approximately 45m AOD, respectively). When the development is observed from this elevation the assimilating / softening / filtering effect of the GI will be significantly reduced.

The LVIA also asserts that the proposed Garden Village will be seen in the context of other built development apparent within the wider view from the two Meon Hill viewpoints. However, the Board questions the validity of this statement. The nearest built development to these viewpoints is Upper Quinton and Lower Quinton. These are much smaller, rural settlements than the proposed development and, therefore, more in keeping with the natural beauty of the Cotswolds AONB. The views of the Meon Vale development from viewpoint B4 / 26, in particular, are quite limited. The development at Long Marston Airfield would be a distinct entity from any of these other developments (and would be clearly seen as such), separated by approximately 1km of rural farmland. When considered in conjunction with the existing development, the proposed development is likely to have a negative cumulative impact on views from the AONB.

The Board acknowledges that the applicant was not required to provide visualisations of the proposed development in its LVIA. However, given the points raised above and given the national importance of the views from the Cotswolds AONB, **the Board recommends that the applicant *should* be required to provide visualisations (i.e. photomontages) for the views from locations B4 / 26 and B5 / 27.**

Once these recommendations have been implemented, **the Board recommends that the applicant should be required to re-assess the visual impacts of the proposed development in relation to the two AONB viewpoints.** It may also be appropriate for the LPA to independently assess these visual impacts.

If this further assessment identifies a higher ‘magnitude of change’ then this, combined with the high sensitivity of the visual receptor at the AONB viewpoint locations, could result in the overall effect on the AONB being significant. **If the overall effect on the AONB is shown to be significant, then the proposed development will need to be reviewed to see how this adverse impact can be further reduced and minimised.**

To help summarise the overall significance of the effects, **the Board recommends that the LVIA should include a matrix similar to the one shown below**, which is taken from the ‘Winchcombe Town Landscape and Visual Sensitivity Study’.¹

		Magnitude of Change				
		High	Medium	Low	Negligible	Neutral
Overall Sensitivity	High	Important	Important	Moderate Importance	Negligible	Neutral
	Medium	Important	Moderate Importance	Low Importance	Negligible	Neutral
	Low	Moderate Importance	Low Importance	Low Importance	Negligible	Neutral

¹ Toby Jones Associates (2014) *Winchcombe Town Landscape and Visual Sensitivity Study*. Report for Winchcombe Town Council Neighbourhood Plan Steering Group.

Impacts on the Tranquillity of the Cotswolds AONB

The proposed development is likely to generate a significant number of vehicle movements through a number of Cotswolds AONB villages, both during the construction phase and post-development. For example, the B4632 – through the AONB villages of Mickleton, Weston-sub-Edge, Willersey, Broadway and Toddington - would be one of the main routes for vehicles heading to / from the M5 (southbound).

The Board is concerned that these vehicle movements could have a significant adverse impact on the tranquillity of the AONB, which is one of the AONB's 'special qualities'. Unfortunately, this impact has not been adequately addressed by the applicant (as identified by Warwickshire County Council (Highways) in their letter dated 17th March 2019).

The impact of development on the tranquillity of the AONB is addressed in Policy CE4 of the Cotswolds AONB Management Plan 2018-2023, which states that:

- *Proposals that are likely to impact on the tranquillity of the Cotswolds AONB should have regards to this tranquillity by seeking to (i) avoid and (ii) minimise noise pollution and other aural and visual disturbance.*

In order to fully assess the transport-related impacts of the development on the Cotswolds AONB, including impacts on the tranquillity of the AONB, **the Board recommends that the applicant should be required to undertake further assessment and analysis of these impacts.** This should include data (such as traffic movements at peak hours and per day) specifically for the following routes and towns and villages:

- (i) the B4632 in - and adjacent to - the Cotswolds AONB, including the villages of Mickleton, Weston-sub-Edge, Willersey and Broadway;
- (ii) the minor roads between Lower Quinton and the A429, including the village of Ilmington.
- (iii) the A44 between Willersey / Broadway and Moreton-in-Marsh, including the village of Bourton-on-the-Hill;
- (iv) Chipping Campden;
- (v) Moreton-in-Marsh.

The Board also recommends that the applicant should be required to clearly identify the proposed mitigation, specifically in relation to these AONB routes, towns and villages, including the provision of viable and realistic alternatives to private car use. In particular, the Board recommends that consideration should be given to imposing weight restrictions on the relevant B roads and minor roads, at least during the construction phase of the development, in order to minimise the movement of HGVs through the AONB villages.