

Cotswolds Conservation Board
Fosse Way
Northleach
Gloucestershire
GL54 3JH



5th November 2018

Mr Bob Rustic
Planning and Development Services
Tewkesbury Borough Council

By email to bob.ristic@tewkesbury.gov.uk / developmentapplications@tewkesbury.gov.uk

Dear Mr Ristic

Planning applications 18/00883/FUL, 18/00884/FUL, 18/00885/FUL and 18/00886/FUL

Proposed agricultural buildings, associated access track and yard area

**Land Adj Berry Wormington Cheltenham Road Stanton Broadway Gloucestershire
WR12 7NH**

The Cotswolds Conservation Board ('the Board') OBJECTS to the four planning applications, referred to above, due to the potential impact of the proposed development on the Cotswolds Area of Outstanding Natural Beauty (AONB), which the proposed development is located within. Our comments relate to the four planning applications collectively, as the four agricultural buildings together clearly represent a single development proposal.

The Board recognises the need for viable agricultural businesses with the AONB. However, this viability should not be at the expense of the purpose of AONB designation, which is to conserve and enhance the natural beauty of the AONB. The Board is of the opinion that the proposed development is likely to have an adverse effect on the natural beauty of the AONB. In particular, it is likely to have adverse effects on the landscape and on views and visual amenity, including the views from the Cotswold escarpment and the Cotswold Way National Trail. This being the case, the proposed application does not comply with the policies of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy, particularly Policy SD7 (The Cotswolds Area of Outstanding Natural Beauty), the policies of the Cotswolds AONB Management Plan or the recommendations of the Board's Landscape Strategy and Guidelines. Further details are provided in Annex 1, below.

The Board is particularly concerned that the planning applications have not adequately recognised or addressed these potential adverse effects. For example, Section 11 (Landscape) of the applicant's Planning Statement makes no reference to the Cotswolds AONB and does not acknowledge that the proposed development would be visible from the Cotswold escarpment and the Cotswold Way National Trail. As such, it fails to give great weight to conserving and enhancing landscape and scenic beauty in the AONB, as required by paragraph 172 of the National Planning Policy Framework (NPPF).

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

Cotswolds Conservation Board Fosse Way Northleach Gloucestershire GL54 3JH

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Website: www.cotswoldsaonb.org.uk

The Board recommends that the applicant should undertake a Landscape and Visual Impact Assessment to more clearly – and more realistically - identify the likely effects (of all four agricultural buildings, collectively) on the landscape and on views and visual amenity. This assessment should include details of the height of the proposed agricultural buildings, a more detailed explanation of the proposed mitigation measures and the extent to which these measures are likely to mitigate any adverse effects. If the applicant cannot clearly demonstrate that there would be no significant adverse effects, the application should be refused. Given the scale and location of the proposed agricultural buildings it is unlikely that adverse impacts could be adequately mitigated.

The planning applications provide very little information on where or how the applicant's livestock is currently housed and managed. This lack of information calls into question the need for the proposed development of four agricultural buildings, both in terms of its scale and its location. For this reason, the Board recommends that the applicant should be required to clearly demonstrate the need for the development, including an assessment of the current provision for the livestock (and why this is not adequate) and the scope for accommodating this provision outside the AONB or meeting the need for it in some other way. If the applicant cannot provide this information, the application should be refused.

The Board recommends that the applicant should submit a revised planning application that includes all four of the proposed agricultural buildings, so that the application can be assessed in terms of the collective impact of all four agricultural buildings (and the access track and yard area). The Board is also aware that the applicant intends to submit an application for residential development on this site. If this is the case, the applicant should incorporate this residential development into the revised planning application, rather than seeking a subsequent change of use.

If you have any queries regarding these comments, please do not 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
Planning and Landscape Officer

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ANNEX 1. Additional comments from the Cotswolds Conservation Board relating to planning applications 18/00883/FUL, 18/00884/FUL, 18/00885/FUL and 18/00886/FUL

Relevant Policies and Guidance

Policy SD7 (The Cotswolds Area of Outstanding Natural Beauty) of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy states:

- All development proposals in or within the setting of the Cotswolds AONB will be required to conserve and, where appropriate, enhance its landscape, scenic beauty, wildlife, cultural heritage and other special qualities. Proposals will be required to be consistent with the policies set out in the Cotswolds AONB Management Plan.

Policy CE10 (Development and Transport – Principles) of the Cotswolds AONB Management Plan 2018-2023¹ (adopted by the Cotswolds Conservation Board on 20th September 2018) states that:

- Development in the Cotswolds AONB and in the setting of the AONB should have regard to – and help to deliver – the purpose of conserving and enhancing the natural beauty of the AONB and increasing the understanding and enjoyment of the AONB’s special qualities.
- Proposals relating to development ... in the Cotswolds AONB ... should ... have regard to and be compatible with guidance produced by the Cotswolds Conservation Board ... including the Cotswolds AONB Landscape Strategy and Guidelines.

Policy CE1 (Landscape) of the Management Plan states that:

- Proposals that are likely to impact on, or create change in, the landscape of the Cotswolds AONB should have regard to, be compatible with and reinforce the landscape character of the location, as described by the Cotswolds Conservation Board’s Landscape Character Assessment and Landscape Strategy and Guidelines.
- Proposals that are likely to impact on, or create change in, the landscape of the Cotswolds AONB should have regard to the scenic quality of the location and its setting and ensure that views ... and visual amenity are conserved and enhanced.

The Board’s Landscape Character Assessment has identified 19 different Landscape Character Types (LCTs) for the Cotswolds AONB. The proposed development is located in LCT 19 (Unwooded Vale). The Board’s Landscape Strategy and Guidelines for LCT 19² state that:

- The sparsely settled and deeply rural ... landscape type [LCT 19] is highly sensitive to change, particularly in agricultural areas not currently associated with development.
- Vale landscapes bordering upland areas with wide vantage points such as the Escarpment and Escarpment Outliers landscape types are particularly sensitive to the effects of large scale built development such as agricultural sheds and light industrial units as these are difficult to screen from elevated vantage points.

As such, the proposed development is clearly located in a highly sensitive landscape. This sensitivity is increased by the fact that the proposed development equates to a ‘large scale

¹ <https://www.cotswoldsaonb.org.uk/planning/cotswolds-aonb-management-plan/>

² <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/07/lct-19-unwooded-vale-june-2016.pdf>

build development such as agricultural sheds' and lies close to both the 'Escarpment' and 'Escarpment Outlier' Landscape Character Types (LCT 2 and LCT1, respectively).

The Landscape Strategy and Guidelines for LCT19 makes a number of recommendations relating to development in this LCT, including the following:

- Avoid development that will intrude negatively into the landscape and cannot be successfully mitigated against.
- Maintain the sense of openness and consider the impact of development, including cumulative development on views to and from the adjacent landscape types such as the scarp.
- Ensure new large scale farm buildings ... do not have an adverse visual impact on the wider landscape including on views across the Pastoral Lowland Vale, and views from and to the neighbouring LCTs.
- Oppose proposals that will become dominant in the landscape.

The site of the proposed development can clearly be seen from the Cotswold escarpment and the Cotswold Way National Trail. It also lies directly in the line of sight of views between the escarpment and the escarpment outlier of Dumbleton and Alderton Hills. Given the scale and location of the proposed development, it is unlikely that any proposed mitigation would be sufficient for the development to comply with these recommendations. By extension, the proposed development would not comply with the policies of the Cotswolds AONB Management Plan 2018-2023 or the policies of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy. As such, the development should not be permitted.