

19th March 2020

Fiona Runacre
Senior Planner
Stratford-on-Avon District Council
Elizabeth House
Stratford-upon-Avon
CV37 6HX



By email only to planning.applications@stratford-dc.gov.uk

Dear Fiona

19/03574/FUL - Erection of Poultry Buildings and Associated Infrastructure - Lunnon Farm, Barcheston

Thank you for consulting the Cotswolds Conservation Board ('the Board') on the above planning application, which is for a development that would be located in the setting of the Cotswolds Area of Outstanding Natural Beauty (AONB).

The Board is concerned that the proposed development could have an unacceptable adverse visual impact on the AONB. We also consider that the planning application has not adequately addressed these adverse impacts. Nor has it adequately addressed relevant guidance published by the Board, as outlined below. For these reasons, the Board objects to the proposed development.

Visual Impact

The Landscape and Visual Impact Assessment (LVIA) for the development includes an assessment of the visual impacts for receptors at one viewpoint within the Cotswolds AONB, on the western slopes of Brailes Hill (approximately Grid Reference SP2933 3977). The LVIA claims that the 'significance of effect' for receptors at this viewpoint would be '*negligible / not significant*', partly because '*the introduction of the proposed buildings would be comparable to the existing agricultural buildings that sit in the local landscape*'.

The Board strongly contends these assertions.

Firstly, the proposed buildings are of a much larger scale (with the three barns covering an area of 0.75ha) than the existing agricultural buildings that are visible from this viewpoint. In addition, the 'feed bins' would protrude, negatively, a further 3m above the ridge height of the buildings and approximately 5m above the sloping roof of the barns. As such, it is highly inaccurate to say that the development would be 'comparable' with the existing agricultural buildings. Indeed, it is more likely that the new buildings would form a dominant and disproportionate built feature in a location that currently has no such features.

Secondly, the photograph used in the LVIA for this viewpoint provides no evidence to back up the assertions made in the LVIA. For example, the photograph doesn't even point out the location of the proposed development, never mind its size or extent. The Board recommends that the photograph should, as a minimum, show a wire frame image of the proposed development. Also, no details are provided with the photograph of the focal length used or the number of images used to make the panorama. As such, the LVIA doesn't comply with the best practice advocated by the Landscape Institute in its LVIA guidance.

Thirdly, it is not clear why only one viewpoint has been selected in the AONB or why the viewpoint selected is not closer to the proposed development. For example, the bridleway on which the selected viewpoint is located comes 300m closer to the proposed development site (i.e. a distance of 1.6km rather than 1.9km), at Grid Reference SP29043951. The footpath descending westward from this point, down the slope of Brailes Hill, provides an elevated viewpoint at a distance of approximately 1.3km from the proposed development site. In addition, the bridleway on the boundary of the AONB, which is still approximately 20m higher than the proposed development, comes to within 1.1km of the proposed development (Grid Reference SP28563962).

These locations could have potentially provided more suitable (or additional) viewpoints to use in the LVIA.

Relevant guidance published by the Board

The planning application makes no mention of the Cotswolds AONB Management Plan 2018-2023 or other relevant guidance published by the Board, in particular, the:

- Cotswolds AONB Landscape Character Assessment (LCA);
- Cotswolds AONB Landscape Strategy and Guidelines (LCA).

This is a crucial omission, for the reasons outlined below.

The LCA identifies that Brailes Hill is located in Landscape Character Type (LCT) 1 – Escarpment Outliers (specifically LCT1G (Escarpment Outliers – Brailes Hill and Castle Hill)). The *‘dramatic panoramic views’* from the escarpment outliers, including Brailes Hill and Ebrington Hill, are one of the key features / characteristics of this LCT. The LCA states that all of the escarpment outliers *‘represent very visible landscapes that frame views, and form punctuation marks in the landscape. The larger outliers form a backdrop to the vale landscapes beneath them and all offer an important orientation point and local landmark’*. In particular, the LCA identifies *‘the conspicuous rectangular copse’* located on the summit of Brailes Hill as *‘a distinctive local landmark’*.

The LSG identifies that the escarpment outliers are highly sensitive to change that would introduce built elements to otherwise agricultural landscapes. The LSG identifies that the *‘construction of large scale industrial style agricultural ‘sheds’ [and] silos ... in prominent locations’* could obscure *‘views of the Outliers when viewed from the vale or nearby Escarpment or Outliers and dominate views of the lowlands when viewed from the upper Outlier slopes’*. The LSG recommends:

- conserving *‘the open, dramatic and often remote character of the Outliers and views to, from and between the Outliers and nearby Outliers and Escarpment’* and
- ensuring *‘that new farm buildings do not have an adverse visual impact on the wider landscape and views’*.

The views from Brailes Hill extends across the development site towards the AONB escarpment outlier of Ebrington Hill, near Ilmington. The Board considers that the proposed development would have an unacceptable adverse effect on this important view between the two escarpment outliers, as well as on the views from Brailes Hill to the wider countryside. In addition, given the height of the feed bins and the ridge height of the buildings, the development could potentially intrude negatively into views from the Barcheston side of the development towards Brailes Hill (for example, at the junction of the B4035 and the minor road to Willington (Grid Reference SP26884018)).

By failing to refer to, or address the, guidance provided in the LCA and LSG, the planning application significantly underestimates the importance of the views from Brailes Hill and the adverse impacts of the proposed development. It also fails to comply with Policies CE1 and CE10 of the Cotswolds AONB Management Plan which require development proposals to be compatible with the LCA and LSG.

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

Yours faithfully,

A handwritten signature in cursive script that reads "John Mills". The signature is written in black ink and includes a long, sweeping underline stroke that extends to the right.

John Mills MRTPI
Planning and Landscape Officer