

17th April 2020

David Stockdale
Senior Planning Officer
Strategic Planning
South Gloucestershire Council
Bristol BS37 0DD
Gloucester GL1 2TH



By email only to planningapplications@southglos.gov.uk

Dear Mr Stockdale

P19/19778/F – Erection of 18 no. dwellings – Land West of Garston Farm, Marshfield

Thank you for consulting the Cotswolds Conservation Board ('the Board') on the above planning application, which is located in the Cotswolds Area of Outstanding Natural Beauty (AONB). The Board objects to the proposed development.

The Board recognises that the Cotswolds AONB is a living and working landscape, in which the provision of affordable housing is an important consideration. The Board acknowledges that the proposed development would make a significant contribution to meeting Marshfield's affordable housing needs, as evidenced by the Housing Needs Survey. The Board also recognises that the proposed development would be proportionate in scale to the existing settlement, in terms of the number of additional dwellings that it would provide.

However, the Board is concerned that the proposed development has the potential to have a significant adverse impact on the purpose of AONB designation, which is to conserve and enhance the natural beauty of the AONB.

In particular, the Board is concerned that the proposed development is physically detached from the settlement boundary of Marshfield. As such, it undermines the settlement character, including the historic context of how the settlement has expanded. The proposed development is, therefore, incompatible with the Cotswolds AONB Landscape Strategy and Guidelines and with the policies of the Cotswolds AONB Management Plan 2018-2023. The proposed development would also be incompatible with the '*very open and exposed*' nature of the site.

In addition, the Board considers that the applicant's Landscape and Visual Impact Assessment (LVIA) is not consistent with the LVIA guidelines published by the Landscape Institute. For example, although the LVIA identifies the site as being 'extremely sensitive to change', it fails to assess both the magnitude and the significance of the effect of the development on landscape character.

This lack of consistency also undermines the validity of the LVIA's assertions relating to visual impacts. The Board considers that the visual impacts are likely to be considerably more significant than the 'neutral' impact advocated in the LVIA. To address the lack of consistency, we recommend that a decision on the proposed development should not be made until a revised LVIA, that is more consistent with the Landscape Institute's LVIA guidelines, has been submitted. Prior to a decision being made, further consideration should also be given to trying to find a site that is more contiguous with the existing settlement.

Based on the points outlined above, the Board considers that the proposed development potentially constitutes major development in the context of paragraph 172 and footnote 55 of

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

Cotswolds Conservation Board Fosse Way Northleach Gloucestershire GL54 3JH

Tel: 01451 862000 Fax: 01451 862001 Email: info@cotswoldsaonb.org.uk

Website: www.cotswoldsaonb.org.uk

the National Planning Policy Framework (NPPF). If that is deemed to be the case, there should be a presumption against planning permission being granted. The fact that the proposed development also lies within the Green Belt adds extra weight to the significance of the potential adverse impacts. Even if the proposal is not deemed to be major development, in this context, great weight should still be given to the adverse landscape and visual impacts.

Without prejudice, if the proposed development is granted planning permission, the Board recommends that the proportion of affordable housing should be at least 75%, of which the majority should be affordable in perpetuity (such as social rented housing). This would be more in keeping with best practice in many protected landscapes. It would also help to limit the scale and extent of development in the AONB, in line with national planning policy.

So, for example, either:

- at least 15 out of the 18 proposed dwellings should be affordable; or
- the development should consist of the 12 proposed affordable dwellings plus no more than four (rather than six) additional, market-price dwellings.

The Board acknowledges the potential merits of the proposed 'farmstead' design concept of the proposed development, particularly given the close proximity of the farms immediately to the east and north east. However, if the proposed development is granted planning permission, the Board recommends that the building materials should include locally quarried Cotswold limestone, rather than just '*yellow brick ... similar in tone to the local Cotswolds stone*' or '*a buff stone 'garden wall' wrapping*'. This would be particularly important for the three 'farmhouse' style buildings. This would better reflect – and contribute to – the key characteristics of the local landscape character, particularly with regards to local settlements and buildings '*being united with the landscape through their common use of Cotswold Stone as a building material*'.

Further information relating to these concerns and recommendations is provided in Annex 1.

If you have any queries regarding these comments then please do get in touch.

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

ANNEX 1. SUPPORTING INFORMATION FOR THE RESPONSE OF THE COTSWOLDS CONSERVATION BOARD TO PLANNING APPLICATION P19/19778/F

LANDSCAPE AND VISUAL IMPACTS

Landscape Impacts

The applicant has submitted a Landscape and Visual Impact Assessment (LVIA) as part of the planning application. However, the LVIA is not consistent with the LVIA guidelines published by the Landscape Institute.¹ For example, although the LVIA identifies the site as being 'extremely sensitive to change', it fails to assess both the magnitude and the significance of the effect of the development on landscape character.

The LVIA also fails to have regard to the Cotswolds AONB Landscape Strategy and Guidelines (LSG).² The LSG identifies the 'potential landscape implications' of various 'forces for change' in each of the landscape character types (LCTs) in the Cotswolds AONB, including the expansion of settlements. It also provides 'strategies and guidelines' to address these potential landscape implications. Key extracts from the LSG are provided in Annex 2.

The proposed development is not compatible, or consistent, with the LSG because, inter alia, it weakens the historic context of how the settlement of Marshfield has expanded. As such, it also erodes the distinctive settlement pattern and growth pattern of Marshfield. For example, Marshfield has expanded from its historic core in such a way that all of the built development is contiguous, whereas the proposed development is physically detached from the settlement, lying approximately 250m outside the settlement boundary.

The LSG also discourages extensions to settlements in areas of open landscape. As such, the proposed development would also be incompatible with the '*very open and exposed*' nature of the site. This currently open landscape helps to separate the settlement of Marshfield from the cluster of farms (and airfield hangers) to the east and north-east of the proposed development, including Garston Farm, Green View Farm and Olcote. For example, there is currently a gap of approximately 300m between the school on the eastern edge of Marshfield and the western boundary of the airfield hangers on the west side of Garston Farm. The proposed development would reduce this gap to approximately 170m, thereby almost halving the gap between Marshfield and the cluster of farm buildings. The proposed development would therefore contribute to the coalescence of these currently distinct built environments. This would not be compatible with the LSG.

In addition, if planning permission is granted the land between the school and the site would become highly susceptible to future speculative infill development, which would further exacerbate this issue of coalescence.

Policy CE10 (Development and Transport – Principles), paragraph 2, of the Cotswolds AONB Management Plan states that '*proposals relating to development ... in the Cotswolds AONB should ... be compatible with guidance produced by the Cotswolds Conservation Board including the ... Cotswolds AONB Landscape Strategy and Guidelines*'. As such, given that the proposed development is incompatible with the LSG, it is also incompatible with the AONB Management Plan.

¹ Landscape Institute and Institute of Environmental Management & Assessment (2013) *Guidelines for Landscape and Visual Impact Assessment*. Third edition.

² Cotswolds Conservation Board (2016) *Cotswolds AONB Landscape Strategy and Guidelines*.

Visual Impacts

The LVIA's lack of consistency with the Landscape Institute's (LI) LVIA guidance³ also undermines the validity of the LVIA's assertions with regards to visual impact.

For example, in many instances, the LVIA photographs and associated information:

- provide no indication of:
 - the site's location or extent on many of the photographs;
 - the focal length of the camera, the 'field of view' or the number of photographs used in some of the panoramic shots
- show multiple viewpoints on one page, whereas best practice would be to have the photograph(s) of just one viewpoint on an A3 page;
- are blurred and / or of low resolution;
- are not taken in a useful direction (for example, the photograph at viewpoint P32 faces south instead of south east and the photograph at viewpoint P40 faces west instead of north west);
- do not include key views, such as looking east from the bridleway immediately to the west of the site (between P32 and P38);
- provide no indication of the significance of the viewpoints (for example, where it is on common land or adjacent to the 'registered parks and gardens' site of Ashwicke Hall);
- provide conflicting information (for example, the information for the photographs from P39 and P40 indicate that the site is partially screened by the hedging around the airfield hangers, whereas, on the photograph location map, this hedging does not appear to be in the line-of-sight from these viewpoints.

In addition, the LVIA's 'visual envelope' map does not include key viewpoints to the south of the proposed development, such as P10 (on the north edge of Cloud Wood), even though the LVIA indicates that the site can be seen from such sites.

To address these issues, the Board recommends that a decision should not be made on this planning application until a new LVIA, that is more consistent with LI guidance, has been submitted.

Showing the location and extent of the proposed development on LVIA photographs, where relevant, should be an absolute minimum. However, for a development such as this, the Board recommends that wire frame images of the proposed developments, as seen from key viewpoints, should also be provided. This will help to determine the extent to which the proposed buildings are visible above the proposed hedging and the extent to which these buildings would be visible on the skyline.

Board considers the lack of rigorous assessment of visual impacts means that the LVIA underplays the significance of the potential adverse visual impacts. As such, the Board also considers that the visual impacts are likely to be considerably more significant than the 'neutral' impact advocated in the LVIA. For example, way in which the proposed development is physically detached from the existing settlement and the extent to which it impinges on what is currently an open and exposed site are likely to exacerbate the visual impacts.

³ Including the Landscape Institute's 'Technical Guidance Note 06/19: Visual Representation of Development Proposals', published in 2019.

ANNEX 2. KEY EXTRACTS FROM THE COTSWOLDS AONB LANDSCAPE STRATEGY AND GUIDELINES

The proposed development is located within Landscape Character Type 11 (Dip-slope lowland). For this LCT (and for most other LCTs within the Cotswolds AONB), the Cotswolds AONB Landscape Strategy and Guidelines (LSG) identifies a number of 'potential landscape implications' associated with the development and expansion of settlements. These include:

- Intrusion of expanded settlement fringes into the landscape.
- Degradation of views to, from and across the Dip-slop Lowland.⁴
- Erosion of distinctive settlement patterns due to settlement growth and coalescence.
- Loss / dilution of organic growth patterns of settlements.
- Interruption, weakening or loss of the historic character of settlements and the historic context in how they have expanded.

The 'strategies and guidelines' for addressing these potential landscape implications include:

- Maintain the open, sparsely settled character of the Dip-slope Lowland by limiting new development to existing settlements.
- Avoid development that will intrude negatively into the landscape and cannot be successfully mitigated, for example, extensions to settlements on visible hillsides or areas of open landscape.
- Ensure that new development does not adversely affect settlement character and form.
- Ensure new development is visually integrated into its surroundings and does not interrupt the setting of existing settlements.

⁴ This also applies to the LCT 9 (High Wold Dip Slope), including Henley Hill to the south of the proposed development.