Planning Application Ref: 18/00770/FUL

Proposed development: Change of use of former wholesale plant nursery to builders yard

Location: Saberton Farm, Beckford Road, Dumbleton

Date of consultation response: 31 July 2019
Response sent to: Bob.Ristic@tewkesbury.gov.uk

Hi Bob

Thank you for consulting the Cotswolds Conservation Board on the proposed development at Saberton Farm (18/00770/FUL).

I'm afraid that I don't have capacity to undertake a comprehensive assessment of this proposed development or to undertake a site visit. As such, I am not in a position to provide a definitive opinion on the proposed development. However, I would like to make the following observations, particularly in relation to the Landscape and Visual Appraisal (LVA), ahead of your meeting tomorrow.

The LVA refers to the Cotswolds AONB Landscape Character Assessment (LCA) and correctly identifies that the site is located in Landscape Character Type (LCT) 19D (Unwooded Vale – Vale of Evesham Fringe). The LVA also makes reference to the Cotswolds AONB Landscape Strategy and Guidelines (LSG), including the 'Local Forces for Change' identified in the LSG. However, the LVA is very selective in the Local Forces for Change that it refers to and it does not directly address the 'landscape strategy and guidelines' for LCT 19. As such, it is the Board's view that the LSG for LCT 19 has not been adequately addressed.

LCT 1 (Escarpment Outliers) is also highly relevant to the proposed development, given the close proximity of Dumbleton & Alderton Hills and Bredon Hill. However, the LVA makes no reference to this. As such, it is the Board's view that LCT 1 and the LSG for LCT 1 have not been adequately addressed.

Of particular significance is the fact that the site of the proposed development lies between two escarpment outliers (i.e. Dumbleton & Alderton Hills and Bredon Hill). A key consideration in the LSG for LCT1 is the potential degradation of views to, from and - perhaps most importantly - between these outliers. The LVA addresses this to some degree, for example, with Viewpoints 6 (Winchcombe Way on Dumbleton Hill) and Viewpoint 10 (Bredon Hill). However, the choice of viewpoints does not seem to capture the most significant visual impacts, as outlined below.

For example, Figure 1 shows that Viewpoint 6 is located on a relatively low elevation of Dumbleton Hill (i.e. on the 75m contour line), with Didcot Farm in the foreground obscuring the view to Saberton Farm. However, if the viewpoint had been located approximately 200m further east along the Winchcombe Way (e.g. at GR: SP00553562), the elevation would be higher (on the 100m contour line) and Didcot Farm would not obscure the view as significantly. It is likely that this would provide a more significant visual impact. Similarly, the view from Viewpoint 10 is partly obscured by the farms at Grafton. A viewpoint a few hundred metres further east (e.g. at GR: SO99153755) would probably provide a clearer view from Bredon Hill to Saberton Farm.

The LVA provides little indication of the extent to which the existing and proposed buildings and other structures at Saberton Farm would be visible above the existing and proposed screening from key viewpoints, particularly from elevated viewpoints on Bredon Hill and Dumbleton Hill. Wireline images of the (new) buildings may be useful in this regard.

It is also worth noting that the images in Figures 5 and 7 (i.e. Viewpoints 6 and 10, respectively) are composites of multiple 50mm photographs. As such, they probably do not capture the view as it would be seen by the naked eye, in which it is likely that Saberton Farm would appear significantly closer, especially when viewed from Dumbleton and Alderton Hills.

Ideally, any new use of the site should remove the on-site conifer hedges, as these are not in keeping with the landscape character. If on-site screening is required, this should use locally native species and be in keeping with the local landscape character. However, these landscape character enhancements would need to be balanced with the increased visual impact that might result from removing the conifers.

It is not clear how the site's use as a builder's yard would 'tidy up' the site, as suggested in the LVA.

Finally, it is worth noting that the Board has recently adopted and published new Position Statements on: (i) <u>Dark Skies & Artificial Light</u> (and appendices <u>here</u>, <u>here</u> and <u>here</u>); and (ii) Tranquillity. These Position Statements should be taken into account.

Whilst the Board acknowledges that there is some scope for enhancement. The Board recommends that these issues should be addressed before a planning decision is made.

I hope that these comments are useful.

Many thanks.

Kind regards,

John

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