



Joanne O'Brien
Senior Planning Officer – Development Management
Worcestershire County Council
County Hall
Spetchley Road
Worcester
WR5 2NP

By email only to: jobrien@worcestershire.gov.uk

2 December 2021

Dear Joanne,

APPLICATION NO: 21/000035/CM

DESCRIPTION: Retention of existing facilities, operations and access at MRW Long Marston: the installation of a wash plant and associated infrastructure for the processing of inert materials, to produce sorting shed, workshop permitted under 18/000048/CM, and the provision of a new site office

LOCATION: Long Marston Works, Long Marston Road, Long Marston, near Stratford Upon Avon, CV37 8AQ

Thank you for consulting the Cotswolds Conservation Board ('the Board') on this proposed development, which would be located in the setting of the Cotswolds National Landscape.¹

In reaching its planning decision, the local planning authority (LPA) has a statutory duty to have regard to the purpose of conserving and enhancing the natural beauty of the National Landscape.² The Board recommends that, in fulfilling this 'duty of regard', the LPA should: (i) ensure that planning decisions are consistent with relevant national and local planning policy and guidance; and (ii) take into account the following Board publications:

- Cotswolds Area of Outstanding Natural Beauty (AONB) Management Plan 2018-2023 ([link](#));
- Cotswolds AONB Landscape Character Assessment ([link](#)) particularly, in this instance, with regards to Landscape Character Types (LCT) 19 Unwooded Vale and 1 Escarpment Outliers;
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)) particularly, in this instance, with regards to LCT 19 ([link](#)), including Section 19.5 and LCT 1 ([link](#)), including Section 1.5;
- Cotswolds AONB Local Distinctiveness and Landscape Change ([link](#));
- Cotswolds Conservation Board Position Statements ([link](#)) particularly, in this instance, with regards to the Tranquillity Position Statement ([link](#)) and with regards to the Dark Skies and Artificial Light Position Statement ([link](#)) and its appendices ([link 1](#), [link 2](#), [link 3](#)).

The proposals comprise the re-ordering of existing works at MRW Long Marston, requiring the installation of a wash plant, filter press, storage tanks, sorting sheds, workshops and offices in addition to associated infrastructure.

Whilst the Board does not object to the proposal, it would like to comment upon landscape and visual impact and lighting matters.

Cotswolds Conservation Board

The Old Prison, Fosse Way, Northleach
Gloucestershire GL54 3JH
01451 862000
info@cotswoldsaonb.org.uk

The Cotswolds National Landscape is a designated Area of Outstanding Natural Beauty (AONB), managed and looked after by the Cotswolds Conservation Board.

cotswoldsaonb.org.uk

Chairman:
Brendan McCarthy

Vice Chair:
Rebecca Charley

Landscape and visual impact

The Cotswolds AONB Landscape Strategy & Guidelines for LCT 1 Escarpment Outliers (Section 1.5), which covers Meon Hill (Character Area 1F) identifies the 'introduction of visually intrusive 'urban' or industrial features to the outliers or their setting' and 'impact on views to and from the outliers' as potential (adverse) implications for development such as this which would feature in the long views from Meon Hill and the Heart of England Way which runs around the hill.

Given the scale of the proposed buildings, which will be up to 13.5m high in the case of the screen deck, the Board considers that they are likely to have an impact upon the setting of the AONB. The tall industrial style buildings would be noticeable in views out from the AONB, increasing the visual intrusion from modern development and the waste recycling facility. However, the Board recognises that to an extent this will be viewed in the context of the current neighbouring metal recycling works, former military bases, railway storage area and the expanding presence of the Meon Vale housing development, all of which are clearly visible from the AONB.

Despite this, the Board considers that the buildings would still introduce a new noticeable negative visual element to the landscape and we would therefore recommend further steps are taken in line with the requirements of paragraph 176 of the NPPF to ensure that the impact of this development within the setting of the AONB is minimised as far as possible. The Board agrees with the applicant that it should be ensured that cladding and the roofing materials for the proposed buildings are coloured in order to make them less visible. Whilst the Board acknowledges that landscape screening is proposed, the submitted landscape plan (dwg. no. LD119-MRW-008) provides no detail and is presented at too large a scale (1:12500@A3) to aid any assessment. Additional and/or improved screening such as vegetation on the bunds and site boundaries would help break-up the massing of the structures in long distance views from the AONB. Ensuring the height and size of the buildings are kept to the absolute minimum needed would also help constrain the visual impact.

Lighting

The Cotswolds AONB Landscape Strategy & Guidelines for LCT 19 Unwooded Vale (Section 19.5) identifies 'the introduction of lit elements to characteristically dark landscapes' as a potential (adverse) implication for development such as this that impacts long views and panoramas. The guidelines seek to 'conserve areas of dark skies', with these dark skies being one of the 'special qualities' of the Cotswolds National Landscape.

As such, the introduction of any lit elements should be designed to adhere to this guidance and, by extension, with the policies of the Cotswolds AONB Management Plan in particular Policy CE5 (Dark Skies) as well as the ILP Guidance Note for Reduction of Obtrusive Light and the CfDS Good Lighting Guide which form Appendices B and C of the Board's Dark Skies & Artificial Light Position Statement (linked above).

The Board notes that the applicant's Planning Statement outlines how site lighting will be required, particular during winter, given the proposed operating hours which may extend between 8am and 6pm. However, the applicant has not submitted any detailed plans in respect of lighting and suggests that a condition is attached to any permission granted to require the submission of further details.

Conclusion

Therefore and without prejudice, if the local authority is minded to grant planning permission, we recommend that appropriate planning conditions should be imposed which seek to mitigate any adverse landscape and visual impact and ensure that both lighting and landscape mitigation and enhancement schemes are secured.

Please do not hesitate to contact me if you wish to discuss this response.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'S. Joyce', written in a cursive style.

Simon Joyce

Planning Officer

simon.joyce@cotswoldsaonb.org.uk | 07808 391227

NOTES:

- 1) Cotswolds National Landscape is the new name for the Cotswolds Areas of Outstanding Natural Beauty (AONB). The new name takes forward one of the proposals of the Government-commissioned 'Landscapes Review' to rename AONBs as 'National Landscapes'. This change reflects the national importance of AONBs and the fact that they are safeguarded, in the national interest, for nature, people, business and culture.
- 2) Section 85 of the Countryside and Rights of Way Act 2000.
www.legislation.gov.uk/ukpga/2000/37/section/85
- 3) The documents referred to in our response can be located on the Cotswolds National Landscape website under the following sections
 - a. Cotswolds Area of Outstanding Natural Beauty (AONB) Management Plan 2018-2023
www.cotswoldsaonb.org.uk/management-plan
 - b. Cotswolds AONB Landscape Character Assessment
www.cotswoldsaonb.org.uk/lca
 - c. Cotswolds AONB Landscape Strategy and Guidelines
www.cotswoldsaonb.org.uk/lsg
 - d. Cotswolds AONB Local Distinctiveness and Landscape Change
www.cotswoldsaonb.org.uk/ldlc
 - e. Cotswolds Conservation Board Position Statements
www.cotswoldsaonb.org.uk/ps1
www.cotswoldsaonb.org.uk/ps2