

Lisa-Marie Evans
Cotswold District Council
Trinity Road
Cirencester
GL7 1PX



By email only to: planning@cotswold.gov.uk

30 March 2022

Dear Lisa-Marie,

APPLICATION NO: 22/00275/FUL

DESCRIPTION: An agricultural barn (27.5 metres by 12 metres) with associated landscaping

LOCATION: Land At Beverston Castle, Beverston, Tetbury, Gloucestershire, GL8 8TU

Thank you for consulting the Cotswolds Conservation Board ('the Board') on this proposed development, which would be located within 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 publications³:

- 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 Type (LCT) 11 (Dip-Slope Lowland) which the site is located within, and LCT 9 (High Wold Dip-Slope) which the site is adjacent to;
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)) particularly, in this instance, with regards to LCT 11 ([link](#)), including Sections 11.2 and 11.15, and LCT 9 ([link](#)) including Sections 9.2 and 9.15;
- Cotswolds AONB Local Distinctiveness and Landscape Change ([link](#));
- Cotswolds Conservation Board Position Statements ([link](#)).

For the reasons outlined below in Annex 1, the Board **objects** to this application. We consider that it would fail to conserve and enhance the landscape and scenic beauty of the Cotswolds National Landscape and as such would conflict with Cotswold District Local Plan Policies EN2, EN4 and EN5, paragraph 176 of the National Planning Policy Framework as well as the guidance contained within Policy CE1 of the Cotswolds AONB Management Plan 2018-2023 and the Cotswolds AONB Landscape Strategy and Guidelines.

Cotswolds Conservation Board

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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

Please do not hesitate to contact me if you require any further information or wish to discuss this response.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S. Joyce', with a small dot at the end.

Simon Joyce

Planning Officer

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

ANNEX 1 COTSWOLDS NATIONAL LANDSCAPE CONSULTATION RESPONSE IN RELATION TO PLANNING APPLICATION 22/00275/FUL

The Board notes that previous applications (appn. refs. 20/04359/AGFO and 21/01366/AGPA) for the prior approval of agricultural developments within this field were refused by the Council, which considered that a proposed grain store would potentially result in an adverse impact on the character and appearance of the Cotswolds National Landscape in terms of siting and scale.

The Council previously considered that, due to its visually detached location from the existing farm buildings to the south, it would result in adverse effects on local views and would form a prominent feature within an undeveloped and rural AONB landscape. Potential light pollution and heritage impacts were identified as additional concerns, though it is noted no lighting is proposed as part of this current application and the Council's Conservation Officer has advised that there is no reason from a heritage perspective why the application should be refused and that it should be judged in terms of landscape impact and other planning considerations. The Council requested that the applicant provide a Landscape and Visual Impact Assessment (LVIA) to demonstrate that the impacts of the proposed building would not be visually harmful.

Having reviewed the information provided by the applicant in support of this application, we consider that the Council's previous assessment should also apply; namely that due to its isolated location and lack of mitigation proposed, the erection of a large agricultural barn in the location proposed would result in major adverse visual effect on some local Public Rights of Way and would constitute a prominent feature within an undeveloped and rural AONB landscape.

Landscape and Visual Impact

The applicant's LVIA is dated January 2021 and appears to have been prepared in support of the previous prior approval application as opposed to this particular proposal. The LVIA states that the proposal is for grain store, however this application is for a barn in a different location within the field. The plans included under 'site layout' at Figure 6 of the LVIA do not show the scheme proposed in this application.

Notwithstanding this discrepancy, having reviewed the LVIA, we have concerns regarding its methodology and content and strongly disagree with its conclusions. Our main concern, outlined below, is that the LVIA underplays the likely landscape and visual impact of the scheme, particularly when viewed from identified Viewpoint 2, located on the Beverston 3 footpath which lies a short distance west within the same field as the proposed barn.

The LVIA does not consider the Cotswolds AONB Landscape Strategy and Guidelines (LS&G). The guidelines for both LCT 11, within which this site is located, and LCT 9, from which the site would also be visible, are relevant in this case and along with the AONB Management Plan, the LS&G are material considerations in planning decisions. Sections 11.15 and 9.15 of the LS&G identify the construction of large-scale agricultural sheds in prominent locations as having potentially adverse landscape implications. The LS&G therefore advise that new large scale farm buildings are located so as not to have an adverse visual impact on the wider landscape including on views across the High Wold Dip-Slope, and views from and to the neighbouring LCTs.

The applicant's supporting statement says that *"there are no known public rights of way within the vicinity of the proposed building. The closest footpath is to the east ... of the proposed building"*. The footpath to the east referred to by the applicant is Beverston Bridleway 8 which forms part of the promoted Macmillan Way long distance footpath. However, as outlined above, Beverston Footpath 3 runs north-south a short distance to the west within the same field as the proposed barn and is at least identified within the applicant's LVIA, with a viewpoint from this footpath included as Viewpoint 2.

The basic hand drawn plans of the proposed barn show that it will be 9m high, 12m wide and 27.5m long. The only landscaping proposed to mitigate its visual impact is a small 'native woodland strip' to the north of the barn shown as a green rectangle on one plan. No further rationale is provided for the positioning of this block, which in itself would appear as an incongruous feature within a large arable field. The closest Public Right of Way to the north appears to be Beverston Bridleway 1, which is around 500m away and views from it to the barn would likely be screened. Moreover, no detail is provided in respect to this planting such as species, spacing or maturity and this planting is not mentioned in the LVIA.

No landscaping is proposed to the western side of the building and as such the barn would be highly visible to users of Beverston 3 footpath for a significant length, including at Viewpoint 2 identified within the LVIA. The LVIA identifies that *"the development would result in a noticeable change in the existing view and would form a well-defined element within the overall view that may be readily noticed by the observer"* and attributes a 'medium' magnitude of change, which when combined with the identified 'high' sensitivity of PRow users would result in a, presumably adverse, 'major/moderate' visual effect.

We do not agree with this assessment. The proposal fails to reflect the conclusions of the LVIA that landscape mitigation is required to the east and west of the proposed barn, presumably because the LVIA has not been prepared to inform this particular proposal. Therefore, the conclusions drawn within the LVIA at paragraph 7.20 that, after planting mitigation has matured there will be a lower impact on views from Viewpoint 2, cannot be taken into account as no mitigative planting is shown in the supporting plans.

Our view is that the magnitude of change from Viewpoint 2 should be considered at least as 'large'; the addition of a 9m high, 27.5m long barn with no landscaping or screening in a relatively flat, elevated arable field would result in what is defined within Table H of the LVIA as *"a prominent change in the existing view and/or would cause a prominent change in the quality and/or character of the view. The development would form prominent elements within the overall view and/or may be easily noticed by the observer or receptor. Standing out, striking, sharp, unmistakable, easily seen"*. It would then follow that, using Table I of the LVIA, the 'high' sensitivity of the observer coupled with a 'large' magnitude of change would result in a 'major' adverse visual effect rather than the 'major/moderate' adverse effect claimed by the LVIA. For this reason alone, we consider that the proposal would demonstrably fail to conserve and enhance the landscape and scenic beauty of the National Landscape.

Other matters

We note that the applicant has not provided an Ecological Appraisal and has not identified whether any Biodiversity Net Gain would be achieved through the development. In addition, we note the concerns expressed by Beverston Parish Council relating to the design and questioning the operational need for the barn.

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