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Dear Reiss

SEDGEBERROW NEIGHBOURHOOD PLAN – STRATEGIC ENVIRONMENTAL ASSESSMENT SCREENING OPINION CONSULTATION

Thank you for consulting the Cotswolds Conservation Board on the Sedgeberrow Parish Draft Neighbourhood Plan and, in particular, the Strategic Environmental Assessment (SEA) Screening Opinion.

The Board considers that a SEA *should* be undertaken, particularly with regards to the potential visual effects of the proposed mixed-use allocation on views from the Cotswolds National Landscape.¹

Table 2 of the Screening Opinion document (in relation to criteria 2g) indicates that *'the policies of the draft Sedgeberrow Parish Neighbourhood Plan are unlikely to have a negative impact on any environmental designations in the Neighbourhood Area'*. However, the Screening Opinion should also take account of the potential effects on environmental designations outside the Neighbourhood Area. In this regard, the relevant authorities (i.e. Wychavon District Council and Sedgeberrow Parish Council) have a statutory duty to have regard to the purpose of conserving and enhancing the natural beauty of the Cotswolds National Landscape.²

Policy 176 of the National Planning Policy Framework (NPPF) states that great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs. Relevant case law clarifies that this great weight applies to the potential impacts of development outside the AONB on views from the AONB. Further guidance on this issue is provided in the Board's Position Statement on Development in the Setting of the Cotswolds AONB ([link](#)).

Only a tiny portion of the Cotswolds National Landscape overlaps with Sedgeberrow Parish (in the north-west corner of the Parish). However, development within Sedgeberrow Parish could potentially adversely affect views from the Cotswolds National Landscape, including views from public rights of way on Bredon Hill, to the west, and on Dumbleton Hill, to the south. Bredon Hill and Dumbleton Hill are part of the Cotswolds AONB Landscape Character Type (LCT) 1 (Escarpment Outliers) ([link](#)). One of the 'key features' of this LCT is the *'dramatic panoramic views'* from these escarpment outliers. Policy CE1 (Paragraph 2) of the Cotswolds AONB Management Plan ([link](#)) states that *'proposals ... should ... ensure that views – including those ... out of the AONB - ... are conserved and enhanced'*.

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

The key issue, with regards to the Screening Opinion document, appears to be the proposed mixed-use allocation. The magnitude of change in the views that would be experienced from viewpoints on Bredon Hill and Dumbleton Hill, as a result from the proposed allocation, is likely to be relatively minor, due to a number of factors, including:

- the distance between the proposed allocation and these viewpoints (i.e. 2km or more);
- the small hill to the south west of the proposed allocation (@ GR: SP01573797), which could potentially obscure views of the proposed allocation;
- the fact that, from these viewpoints, the proposed allocation would be seen in the context of the existing development in Sedgeberrow;
- the fact that there is existing development on the proposed allocation site.

However, if the magnitude of change is considered to be more than negligible and is considered to be adverse, the visual effects of the proposed allocation would potentially be significant. This is because the (very) high sensitivity of visual receptors on public rights of way on Bredon Hill and Dumbleton Hill, combined with a minor, adverse magnitude of change would potentially result in a moderate adverse visual effect. In Environmental Impact Assessments (EIAs), moderate adverse effects are often considered to be significant, especially where these adverse effects would be experienced in multiple locations.

Based on the above points, we consider that a SEA *should* be undertaken, including an assessment of the likely effects of the proposed allocation on views from the Cotswolds National Landscape.

Viewpoints that should be included in this assessment include:

- the Wychavon Way on Bredon Hill, to the west of Ashton Under Hill and approximately 2.5km from the proposed allocation (@ GR: SO99363795);
- the Winchcombe Way on Dumbleton Hill, to the west of Dumbleton and approximately 2.4km from the proposed allocation (@ GR SP01133592).

Publically accessible, elevated views from the Cotswold escarpment (such as on the Cotswold Way National Trail) are probably too far away (@ 7km) to merit inclusion in the SEA.

It may also be appropriate for the SEA to consider the potential adverse impacts of the proposed allocation on views looking towards the Bredon Hill and Dumbleton Hill from publically accessible locations in the vicinity of the proposed allocation (for example, the footpath immediately to the north of the proposed allocation).

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
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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