

Planning application Ref: 14/00577/FUL

Proposal: Provision of a downhill mountain bike facility and ancillary services to include the change of use of existing agricultural barns

Location: Crickley Hill Farm Crickley Hill Witcombe Gloucester Gloucestershire GL3 4UF

Comments of the Cotswolds Conservation Board

1. The Cotswolds Conservation Board ('the Board') was established by Parliament in 2004.

The Board has two statutory purposes¹:

- a) to conserve and enhance the natural beauty of the Area of Outstanding Natural Beauty (AONB); and
- b) To increase the understanding and enjoyment of the special qualities of the AONB.

But if it appears to the Board that there is a conflict between those purposes, they are to attach greater weight to the purpose mentioned in paragraph (a).

In fulfilling these roles, the Board has a duty to seek to foster the economic and social well-being of people living in the AONB.

However, under the Sandford Principle, where there is a conflict between conservation of natural beauty and recreation, in protected landscapes priority is to be given to natural beauty.²

The Council, as a public authority, is required by Section 85 of the Countryside and Rights of Way Act 2000 to have regard to the purpose of designation of the AONB in exercising its functions with respect to the area.

2. With respect to landscape character and visual impact the Board is concerned that the introduction of the bike trails with associate jumps and berms will introduce incongruous features into this area of highly sensitive landscape. With use the trails are likely to become increasingly apparent as the underlying Cotswold brash is exposed. It is not certain that the proposed "long grass" management will adequately mitigate the visual impact of these tracks as they are used, particularly from elevated viewpoints. This would particularly be the case from the view looking south from the Crickley Hill country Park/Cotswold Way towards the site (viewpoints 11 and 12 in the applicants LVIA.). People viewing the site from this location would likely to be highly sensitive to landscape change. This is acknowledged in the LVIA:

"Receptors [people] to the north east of the study site within Crickley Hill Country Park are considered to be the most sensitive with open unobscured views of the study site, particularly the fields to the east." They will have a clear view of elements and features considered to be totally uncharacteristic of the existing landscape

¹ Section 87, Countryside and Rights of Way Act 2000.

² "Areas of Outstanding Natural Beauty" – a Policy Statement, Countryside Commission 1991

3. The Board would therefore suggest that this proposal is not in accordance with National Planning Policy Framework paragraph 115:
115. Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.

Nor is the proposal in accordance with Tewkesbury Borough Council Local Plan Policy **Policy RCN4: Recreation in AONB/SLA/LPZ:**

*Open air recreational uses are acceptable in principle in the area of outstanding natural beauty, special landscape area and landscape protection zone provided that they do not introduce formal or **incongruous landscape features**, [Board emboldening] or otherwise detract from the landscape quality of the area or the quiet enjoyment of the countryside.*

The Board therefore **objects** to this proposal.

4. **Other considerations if the Council is minded to grant consent:**

Conflict with Rights of way. The Board would wish to be assured that the County Council is satisfied that conflicts between the users of rights of way crossing the site and of the proposed bike trails can be safely dealt with.

Biodiversity:

- a) The Board would wish to be assured that measures are in place to protect the important area of calcareous grassland at the southern end of the site from harmful activities and that appropriate management is undertaken.
- b) The Board would wish to a management regime established for the remaining grassland on the site which conserves and enhances the biodiversity value of the site.

Mountain bike use in Cotswolds AONB

The Board is not convinced that this facility will significantly reduce mountain bike activity at sensitive sites in the AONB. This is because

- a) Existing use is free, whilst there will be a charge to users of this facility; and
- b) Downhill biking at this type of facility attracts a different type of user from those primarily involved in cross country mountain biking.