Wiltshire Council Planning Consultation Response

Landscape

Officer name: Mark Goodwin CMLI (Senior Landscape Officer)
Date: 11.12.2023

Application No: **PL/2023/05995(Phase 1)**
PL/2023/05996(Phase 2)
PL/2023/05997- (Phase 3)

Proposal: Erection of high welfare cow housing (3 separate phases)
Site Address: Dairy Buildings near Upper Lodge, Park Lane, Cherhill, Calne, Wilts, SN11 8XW
Case Officer: Peter Crozier

Recommendations:

	No Comment
	Support
	Support subject to conditions (please set out below)
x	Object (for reasons set out below)
	No objections

Matters Considered:
Landscape & Visual Matters. Landscape Designations; Landscape Character; public visual amenity.

Background:
This consultation response considers three separately submitted concurrent planning applications, submitted for the same site address. These three applications are described to constitute 3 separate phases of a larger development that seeks to modernise existing dairy farming operations at an existing farmstead base.

I note that the applicant has already secured planning consent for a large new steel portal framed building on the adjoining land to the south via the 'prior notification' route (LPA reference PL/2023/02411) which was granted prior approval April 2023. It is clear from looking at the information submitted in support of that application that this extant consent was in fact the first phase of the planned expansion/modernisation of this farming operation (housing 100 cattle), with these 3 current applications forming the subsequent phases (housing the remaining 200 head of cattle).

The LPA's agreed siting of this building, (via prior approval) is harmful in landscape and visual terms in my opinion, as the footprint of this building is located on/over an established field boundary (whether currently vegetated or not, established/historic field boundaries are identified as important landscape features to 'conserve and enhance' within landscape character assessments), which extends the established building line and visual influence of the existing farmsteads bulk and massing further south than is reasonable or necessary. The already

consented prior approval application building will be viewed as a detached urbanising outcrop in views from the south and west, which could and should have been avoided by pulling this building footprint slightly further north, back in line with the exiting southern building line and edge of existing farmstead buildings and which would have conserved the historic field pattern.

Policy & Guidance:

National Planning Policy Framework (2021) & Planning Practice Guidance

- NPPF, Para. 8, Achieving sustainable development.
- NPPF, Section 12, Achieving well-designed places.
- NPPF Section 15, Conserving and enhancing the natural environment.

- PPG, Paragraph: 036 Reference ID: 8-036-20190721 - Revision date: 21 07 2019.
  'The National Planning Policy Framework is clear that plans should recognise the intrinsic character and beauty of the countryside, and that strategic policies should provide for the conservation and enhancement of landscapes. This can include nationally and locally designated landscapes but also the wider countryside.'

  'Where landscapes have a particular local value, it is important for policies to identify their special characteristics and be supported by proportionate evidence. Policies may set out criteria against which proposals for development affecting these areas will be assessed. Plans can also include policies to avoid adverse impacts on landscapes and to set out necessary mitigation measures, such as appropriate design principles and visual screening, where necessary. The cumulative impacts of development on the landscape need to be considered carefully.'

Wiltshire Core Strategy (2015)

- Core Policy 34: Additional employment land
- Core Policy 51: Landscape
- Core Policy 52: Green Infrastructure
- Core Policy 57: Ensuring high quality design and place shaping.

North Wiltshire District Plan (2011) – (saved policies)
Core Policy NE14: Trees Site Features and Control of new development

Countryside & Rights of Way Act 2000 (CRoW Act 2000) - Section 85, Duty of Regard.

- 'in exercising or performing any functions in relation to, or so as to affect, land' in National Parks and Areas of Outstanding Natural Beauty, relevant authorities 'shall have regard' to their purposes for which these areas are designated.

- This duty is particularly important to the delivery of the statutory purposes of protected areas. It applies to all local planning authorities, not just National Park authorities, and is relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which might have an impact on their setting or protection.
  (Planning Practice Guidance - Paragraph: 039 Reference ID: 8-039-20190721 - Revision date: 21 07 2019)

Designations
The site lies wholly within the North Wessex Downs National Landscape (Formerly AONB).

Landscape Character

The proposed development site is located within the North Wessex Downs National Landscape (formerly North Wessex Downs AONB). The farmstead and application site fall within landscape character area ***16: Liddington Scarp*** (North Wiltshire Landscape Character Assessment) which is a narrow area consisting of a steep scarp slope which extends from the east of Cherhill in the south, extending up to Liddington, south east of Swindon, generally rising up from the mixed farming lowland landscape at around 100m AOD to the higher arable chalk landscape of Avebury Plain at around 200m AOD. The underlying geology is lower chalk overlaying Gualt Clay. The steeper topography tends to dictate the land use. For much of the scarp, woodland cover is located on the higher and steeper ground, with grassland on lower slopes. To the south, above Cherhill, the scarp becomes gentler, and the pastoral and wooded landscape gives way to increasingly arable land use. Fields are generally small scale, with intact mature hedges with boundary trees on lower ground, gradually becoming patchier with elevation. The most important field boundaries run directly up the slope connecting to field boundaries on adjacent higher and lower ground.

The scarp is a significant landscape feature predominantly viewed from the west, and also viewed from the south as it wraps around the higher Avebury Plain extending east to encompass Cherhill. Cherhill is the only settlement of any size and the only settlement with any significant C20th development which lies partly on the A4.

From within the area there are significant views out from the scarp, but often the woodland cover reduces these views out. The scarp provides a strong character and backdrop in views from the settled lower Clay Vales. The south facing scarp slopes above Cherhill are also visible from the higher Open Chalk Downland which overlooks Cherhill from the south. The higher land at Cherhill Down includes some important elevated areas of 'Open Access land', and includes the 'Cherhill White Horse' chalk hill figure, and the Lansdowne Monument both local landmarks and popular destinations linked by the 'White Horse Trail', and 'Wessex Ridgeway', promoted recreational routes.

The landscape character assessment highlights this area is sensitive to new development. ''*The whole area has a rural character and has very little* settlement. *The exposed nature of the scarp means that virtually no development would be acceptable on this steeply rising land apart from that essential to agricultural use. This would need to be sited in discreet areas well screened from view.*''
''Views out are important and should be retained where possible. Views of the scarp are critical from the surrounding area including from the A4, Calne and villages within the Hillmarton Character Area.''

<u>Comments on the application information</u>
The application is not supported by any form of Landscape and Visual Appraisal (LVA) or Landscape and Visual Impact Assessment (LVIA). Given that the new development is proposed in an elevated prominent location within a nationally valued landscape, I believe that these applications should have been accompanied by a proportionate landscape and visual appraisal to inform considerations of detailed siting, cumulative effects, and appropriate landscape and visual mitigation strategy.

I note that the author of the planning statement has briefly commented on landscape and visual matters as follows…

5.12 The siting of the proposed cattle housing has been carefully chosen to minimise its visual impact. The building adjoins the forthcoming cow housing granted prior approval in April 2023 and is in close proximity to existing agricultural buildings of similar character and appearance within the farmyard to the west. The proposed building would therefore be viewed in the context of similar development and would not appear alien, isolated or unduly prominent.

5.13 The site is well screened from public vantage points within the village to the south, but is visible from rising ground on the opposite side of the valley towards the Cherhill White Horse and the Lansdowne Monument. From these vantage points the impact of the proposals is diminished by range. They would be seen in the context of the existing farmyard and would be viewed as a logical extension of it. It is also pertinent that they would be viewed against the backdrop of rising ground and woodland and would not therefore punctuate the horizon. The proposed building would therefore be well screened from more distant vantage points and would not appear unduly prominent within the landscape.

5.14 The proposals would not therefore appear out of keeping with their rural surroundings and would not harm the character or appearance of this rural landscape. The proposals therefore comply with Core Policies 51 and 77 of the Wiltshire Core Strategy.

I disagree with these above assertions and conclusions. The site is not well screened it is particularly exposed from the south and west, and from local public rights of way, from the A4 (east and west), and from more distant receptors from the south and west. The scale of development is only considered in relation to operational needs of the farming operation, which I accept is fundamentally important, but not the only material planning consideration here.

The submitted planning statement/s that accompany these 3 planning applications fails to identify that the proposed development site lies wholly within the North Wessex Downs National Landscape (formerly North Wessex Downs AONB), nor give any consideration to the statutory purpose, function, and value of this national landscape designation, neither does it ascribe any planning weight whatsoever, within its consideration of planning matters at section 5 to the national landscape designation.

The application gives no regard or any consideration to the ‘special qualities’ of the National Landscape designation as required by WCS, CP51 (x), and fails to discuss how development ‘conserves and enhances’ natural beauty or describe how the proposals will result in visual change effects for the users of the rural public rights of way network / or how these change effects might be mitigated to any extent by landscaping measures.

None of these separate applications considers the potential for cumulative effects of these combined developments (including with the prior notification application) with the existing farmstead, in terms of the cumulative change of built form and massing of large scale modern

agricultural building massing on this hillside, i.e. effectively doubling the size of the farmsteads built form.

In my opinion the LPA's determination of application PL/2023/02411 (prior approval, granted April 2023) should have better considered issues of detailed siting. The agreed siting of that building was located too far south, jutting out in isolation from the existing established built mass and volume of existing farmstead buildings. The siting of that building should have retained the existing field pattern and required any new buildings to be contained within it. The existing field boundary should have been enhanced and reinforced with hedge planting and occasional hedgerow trees, or a shelter belt of native tree planting, to help partially screen and break up the combined massing effects of the existing farmstead viewed in combination with the proposed new development.

In my opinion appropriate consideration of the sensitivity and value of the countryside, public rights of way, existing landscape features was not afforded within the decision making process for the prior notification application, and the LPA has fallen short of its own statutory requirement as a 'responsible authority' under Section 85 of the Countryside and Rights of Way Act (2000) in relation to its 'duty of regard' to the statutory purpose and function of the AONB (now National Landscape) while acting in its capacity as LPA for that application.

I am unable to support these current applications as they compound and consolidate this identified harm.

I suggest the LPA could further establish the current and future uses of all the existing large modern agricultural buildings at this farmstead prior to consenting further greenfield development, as the agricultural report submitted in support of these applications doesn't include this level of detail, and I don't consider it reasonable to simply accept that the existing cattle buildings originally housing 300 head of cattle would simply continue *"to be used for housing youngstock, dry cows, and improving cow collection facilities for the milking parlour"* as currently stated. The re-use of existing farm buildings or replacement new buildings on previously developed land, following the phased demolition of redundant buildings (stated to be unfit for purpose) is a reasonable expectation from the LPA in this Nationally Protected Landscape in order to avoid unnecessary greenfield land take to achieve sustainable development, prevent decline and dereliction of existing farm buildings in the National Landscape and reduce potential future applications for unsuitable / unsustainable new use/s of abandoned or underutilised farm buildings in the future along these visually sensitive scarp slopes.

As a result of the first prior notification application granted prior approval April 2023, the landscape and visual baseline has changed. The applicant has since submitted these three further separate planning applications, which are described as forming 3 separate phases of the same development. However, the first phase of this larger development as it now transpires was clearly the prior notification application (to house the first 100 head of cattle) which itself gave no indication of the following planned phases of development. With the 3 subsequent phases planned to house the remaining 200 head of cattle,

None of these applications considers the collective cumulative effects from all 4 applications combined. Indeed, the planning consultant uses the prior approval for the southernmost building, to justify the location of the additional current 3 live separate planning applications. At

no point do any of these applications consider the combined effects of all 4 proposed new buildings in combination with each other or the existing farmstead buildings.

Conclusion
These three current live planning applications do not demonstrate that the resulting landscape and visual effects of the currently proposed development have been appropriately considered, either individually, collectively, or cumulatively with the already consented building (application PL/2023/02411) or the existing farmstead.

The location of all 4 proposed new buildings (including application PL/2023/02411) effectively doubles the farmstead building footprint along the scarp slope. These new buildings could and should be better sited at this sensitive location, which I suggest could all be pulled back slightly further north (including the consented building) in order to minimise the resulting urbanising outcrop and farmstead creep south of the existing farmstead built form / building lines and retaining and working with the historic field pattern, with the field boundary reinforced with new native planting to help break up the combined massing of new and existing built form on this hillside.

The 3 current live applications compound and consolidate the harm caused by the siting of the first prior approval building consent (PL/2023/02411), which I consider to be particularly insensitive in landscape and visual terms within this National Landscape Designation.

The applications fail to consider or incorporate any landscaping measures to help reduce the identified harmful impacts, accordingly the 3 current live applications and the extant building consent are all considered unacceptably (and avoidably) harmful, contrary to WCS, CP51 and CP34 (vi). The proposals fail to demonstrate that the resulting landscape and visual harm have been reduced as far as possible through sensitive design (including considerations of siting) and landscape measures, resulting in unacceptable harm to landscape character, important views, and visual amenity within a nationally protected and valued landscape.

End.