



Wye Valley AONB Office, Hadnock Road, Monmouth, NP25 3NG

14 March 2023

**FAO Mrs Gemma Webster, Herefordshire Council**

**Dear Mrs Webster,**

**Planning Application Reference: P230487/O - Land at Rectory Farm, Ashfield Park, Ross-on-Wye, Herefordshire**

**Proposal: Proposed outline application for proposed new dwelling and garage, with all matters, save access, reserved**

The application site lies within the Wye Valley Area of Outstanding Natural Beauty (AONB), an area designated for its outstanding national landscape. As per paragraph 176 of the National Planning Policy Framework (2021), great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas. The scale and extent of development within this designated area should be limited. The Wye Valley AONB Management Plan 2021-2026 sets out the vision for the Wye Valley Area of Outstanding Natural Beauty (AONB) and the priorities for its management over a 5-year period. It is a statutory document of the relevant local authority under Section 89 of the Countryside and Rights of Way (CROW) Act 2000. The Plan is a material consideration in the respective Core Strategies and Local Development Plans / Local Development Frameworks of the constituent local planning authority and for Neighbourhood Development Plans.

The site lies within Landscape Management Zone LMZ07 'Ross-on-Wye' (as defined in the Wye Valley AONB Management Plan 2021-2026), which has several important features. These include, which are also relevant to the application site, as follows:

- Distinctive Spire and skyline [SQ11];
- Devonian Old Red Sandstone buildings and cliffs [SQ7]; and
- Mix of stone and rendered buildings on escarpment overlooking river [SQ20]

The Special Qualities [SQs] identified are as follows:

- SQ7 – Lower Devonian Old Red Sandstone
- SQ11 – Picturesque, extensive & dramatic views
- SQ20 – Vernacular architecture: Farmsteads Commoners cottages, Estate houses

The application site appears to form part of the scope of Key View 'B6' under Figure 10 of the adopted Ross NDP, which links to Policy EN7 'Key Views', in that development proposals likely to affect the Key Views shown on Figure 10 should assess the effect of the proposals on the view(s) and demonstrate how any adverse impacts have been addressed.

The application site, which forms part of Rectory Farm, forms part of a secondary grouping of dwellings including Cliff House and The Glebe, that contributes to 'The Postcard' view of Ross-on-Wye, one of the Wye Valley AONB 'honey pots'. The site is visible from various distances from multiple PROWs and public highways by various users including walkers, cyclists and drivers from the north, north-west, north-east and east. Landscape and Visual Impact Assessments (LVIA) are an essential tool in the planning process for identifying impacts on landscape character and visual impacts from major developments. The Guidelines for Landscape and Visual Impact Assessment (GLVIA3) includes a chapter on cumulative effects assessment. GLVIA3 should be used for Environmental Statements and may also be useful in relation to smaller scale developments. We therefore feel this should be submitted as part of this application to enable an accurately informed assessment of the impact on the Wye Valley AONB hereabouts by a suitably qualified landscape professional.

Given the application seeks outline planning permission, it is difficult to judge as to what extent the proposed development will form in terms of a dominant new feature in the landscape and/or if it damages or impacts on several Special Qualities, simultaneously. Matters of scale, layout, appearance, and landscaping, which of course would form part of any future reserved matters application, will be imperative to ensure appropriately delivery of a development which truly enhances the Wye Valley AONB. The site is prominent on a localised ridge [SQ11] and any emerging proposal should comprise genuinely single storey buildings that adhere to an appropriate vernacular with carefully considered landscaping. Its location from the vicinity of views across the skyline of Ross-on-Wye should be strongly contemplated and factored in.

Development that could contribute to light pollution, and hence impact adversely on dark night skies, needs to be modified so that such impacts are eliminated. The AONB is, therefore, also concerned about light pollution. Any external lighting should be explicitly approved by the Local Planning Authority. The same can be said for any proposed design. Poor design of buildings and curtilage can detract from landscape character, e.g. dominant rooflines, urbanising rural areas with oversized windows, natural hillsides engineered for car parking & turning points, excessive lighting and inadequate landscaping or screening. Indeed, screening should not be used as a mitigating tool to 'hide' poor development and practices.

We note that no ecological survey accompanies the submission, somewhat concerning given the site is within a Local Wildlife Site/SSSI, as mapped on the Council's Ross-on-Wye Town and Parish Policies Map. Potential destruction of habitat and disruption to the integrity of wider ecological networks and hydrological function (extent dependent on scale), should be considered. You may wish to seek further comments from the LPAs Ecologist on these matters, as well as comments pertaining to the impact on the River Wye SAC.

There is an upmost necessity to protect key views into and out of the Wye Valley AONB. As you will see from the above, we do have reservations regarding the impact on the on the landscape and scenic beauty of the Wye Valley AONB and whether this would be truly conserved through the proposal. The range of aspects for which the AONB is valued as important is simply much more than visual. Natural beauty includes wildlife, geology, heritage, landscape character, scenic beauty, environmental quality and opportunities for enjoyment, and in assessing a planning application the collective impact of these factors needs to be considered. However, it is a commonly expressed concern that it is often the incremental effect of developments collectively that encroaches on and erodes the landscape features and Special

Qualities of the AONB. New development should ultimately be proportionate and not overwhelm existing development. In some areas the integrity of the AONB is challenged by incremental and cumulative development, where one poor development is used to justify the next.

The AONB Unit hopes that you take on board these comments when making your assessment. Should amended plans be submitted, the AONB Unit wishes to be formally re-consulted and reserves the right to make further comment.

Yours sincerely,

**Josh Bailey**

AONB Planning Officer (shared) on behalf of the Wye Valley AONB Unit

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Working in partnership to conserve and enhance the internationally important protected landscape of the Wye Valley Area of Outstanding Natural Beauty (AONB), where the high quality landscape brings health, cultural and economic benefits for local people and visitors.

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