

**From:** Josh Bailey <[planning@wyevalleyaonb.org.uk](mailto:planning@wyevalleyaonb.org.uk)>

**Sent:** 20 April 2023 15:15

**To:** Carlisle, Heather <[Heather.Carlisle@herefordshire.gov.uk](mailto:Heather.Carlisle@herefordshire.gov.uk)>

**Subject:** 223479 - Land to the East of the A40 - St Mary's Garden Village - Phase 4A, Ross on Wye, Herefordshire

Dear Heather,

Thank you for consulting us on the reserved matters application above and apologies for the delay in responding. The site, whilst outside of the Wye Valley AONB boundary designation, is considered to form part of its setting. The Wye Valley AONB Partnership strives to encourage high quality design and to protect, conserve and, where possible, enhance this nationally designated landscape.

This proposal forms part of a further significant urban expansion to the East of the A40 at Ross-on-Wye. Previously, the currently under-construction housing estates adjacent, proposed a significant landscape buffer, which included recreational, open space and drainage arrangements, including on part of what is now the current application site. This current proposal will effectively infill part of the landscape buffer approved.

The site lies to the eastern edge of Ross-on-Wye with a landscape character type, in referring to Herefordshire Council's Landscape Character Assessment Updated 2009, of Principal Settled Farmlands. The key characteristics of the site are consistent with that landscape type, namely hedgerows for field boundaries and open fields. The topography is particularly important to the site, sloping down to the Rudhall Brook corridor. This slope allows for some particularly longer-distance views from the south, north and the east into the AONB.

It is noted that the earthworks for construction of the adjacent schemes and completed dwellings are clearly visible and have already altered the character of the area. However, whilst we accept that the principle of housing has already been considered acceptable when outline planning permission was granted, noting the current Reserved Matters application, we raise the following considerations for the LPA to address within the submission:

#### **Green Corridor**

We stress that the green corridor to the eastern boundary is particularly important. This is in order to provide a clear transition to the existing open countryside, although dwellings fronting this corridor would seem appropriate. This strengthens the separation between town and country, without hiding one from the other. There will be views towards the development from the south and east which will incorporate the fields and skyline of the AONB, albeit as a backdrop. Such views are of considerable significance bringing much enjoyment to local people and many visitors, noting that Ross-on-Wye is one of the 'honeypot' areas of the AONB. It is important that the impact of these views continue to be appropriately assessed and that mitigation seeks to preserve these views by successfully integrating development into the landscape.

Unfortunately, 'lifeless' boundary treatment brick walls and close board timber fences, particularly at the fringes of the application site, do little to reinforce this corridor and should be replaced with more appropriate boundary treatments like hedgerows. It was understood when outline planning permission was originally granted, it was necessary to

ensure that the urban expansion can be read together as one site. The housing pockets shown on the plan are not broadly of a similar size and layout. The green infrastructure should connect to that already planned, notably the balancing ponds to the south, the green corridor along the east boundary providing a buffer to the existing public right of way and a green link about half way up. We would ask for space for standard &/or street trees – to ‘enhance’ the landscape.

### **Design and Materials**

The site will be visible, both in views from within and looking towards the AONB. Therefore, it is imperative that the site integrates well into the landscape. We would preferably welcome more robust evidence of the applicant’s consideration of how effects of the proposed design, building materials and particularly colour will help minimise the visual sprawl and impact of this development on the AONBs setting. We note no actual manufacturer details of the proposed building materials have actually been provided of the roofs.

We would request that all materials should be of a non-reflective nature to reduce their long-distance visibility. In particular, the roofs of any structures on this site should be of darker and muted colours. We would seek clarification, from a sustainability perspective, as to whether PV panels will be incorporated into the proposals. Again, we seek re-assurance that they will be non-reflective and uniformly dark to avoid drawing the eye. Care may be needed to minimise an obvious contrast when using dark panels if using a brown clay tiled roof. However, the slate tiled roofs should have a darker appearance and so contrast with solar panels would be expected to be reduced. We request a suitably worded condition for timely removal/replacement of the panels once they have reached the end of their workable life.

It is also noted that just 1 of the proposed 94 dwellings will be single-storey. One should clearly and comprehensively propose a greater variety of housing types rather than the almost whole development being effectively two-storey dwellings.

### **Consideration of Views Into/Out of the AONB**

Loss and degradation of views is identified as a particular issue in the Wye Valley AONB. Without careful management, views from within and towards the AONB will be degraded and lost as lifeless structures are built. Support for sensitive development in the setting of AONBs exists within PPG.

We feel the applicant has downplayed the effects of the proposed development in extending the built form to the east. Not only will the proposed development extend the built envelope into open countryside further but will do so with a form of development (residential, estate-style housing along with parked cars, gardens, fences, bin collection points etc.) which does not currently form a part of the scene in many existing views. Unfortunately, it’s the cumulative effects of a marked increase in built form, in combination with the existing detracting features, which is likely to have a detrimental effect on the setting of the AONB.

### **Light Pollution/Dark Skies**

Light Pollution is another big consideration in terms of new development within, and the setting of the AONB, particularly as dark skies are an intrinsic aspect of the countryside. Light pollution is avoidable through improved design, and should genuinely only be installed where it is needed, following guidance and good practice. Simple steps such as angling any existing/proposed lighting downwards, without tilt and spill, fitting cut-out timers and

sensors can help reduce light pollution. Little has been said on this within this submission. We note the likely Section 38 agreement pertaining to street lighting.

### **Summary**

If the quality of the setting declines, then the appreciation and enjoyment of the AONB itself will diminish. We feel that a vastly improved scheme can be secured, in order to conserve the setting of the AONB, which may necessitate a reduction in the number of units being provided and more informative consideration of the sensitivities of site constraints. The above should be taken into consideration when assessing this application, in order to conserve the setting of the Wye Valley AONB, and that the proposal does not conflict with Paragraph 176 of the NPPF (July 2021) or Strategic Objectives WV-D2 or WV-D3 of the Wye Valley AONB Management Plan 2021-2026. We hope you can take our comments into consideration when making your assessment of this application. Should amendments be sought, we request that we are formally re-consulted and reserve the right to amend our comments further.

Yours Sincerely,

### **Josh Bailey**

AONB Planning Officer

Email: [planning@wyevalleyaonb.org.uk](mailto:planning@wyevalleyaonb.org.uk)

Website: [Wye Valley AONB](http://Wye Valley AONB)

*Please note: My usual working days with the Wye Valley AONB are Mondays, Tuesdays and Fridays*



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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