Representation on planning application 17/07028/REM - Reserved Matters of layout, scale, appearance and landscaping for the erection of 5no. B1 employment buildings with associated access roads, parking and landscaping

1. Introduction

This representation explores the case for a significant adjustment to the layout and scale of the proposed buildings.

In granting outline permission through application 13/05724/OUT (to which scores of local people objected), no consideration was given in the developer's Landscape and Visual Impact Assessment (LVA) or by Wiltshire Council to the loss of significant 10- and 16-mile views across the Clay Vale to the Marlborough Downs and Salisbury Plain.

Wiltshire's Core Strategy in Core Policy 51 states: "Development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design ..." It then goes on to list nine aspects of landscape character that should be conserved. One of these nine is "Important views and visual amenity".

The LVA was deficient in a number of respects. Its summary stated "the significance of landscape effect for the construction of the proposal is assessed to be negligible". However, its selection of viewpoints was ill-considered. Viewpoint 8 (on the footpath between Springfield Close and Bradford Road), at 137m above sea level, is by no means at the highest point of this footpath which is 146m above sea level behind, for example, nos 56-66 Springfield Close. At this, higher, point is where we have the 10- and 16-mile views across the Clay Vale to the Marlborough Downs and Salisbury Plain. These views and their significance are discussed and illustrated in this document.

The North Wiltshire Landscape Character Assessment (here: http://www.wiltshire.gov.uk/north_wiltshire_landscape_character_

assessment_2004_volume_1.pdf) part 4.194, **Key Views management strategy** states: "The gently sloping topography of this area offers expansive views of both urban areas and the rural landscape. Views from key footpaths could be developed. Views from the A4 are important and clear separation between settlements needs to be maintained eg between Corsham and Rudloe." This does not specifically mention the Springfield Close/Bradford Road footpath but the principle of "key footpaths" at Rudloe is introduced.

The Planning, Design and Access Statement from Pegasus Group, dated August 2017, lists and discusses Core Policies of the Core Strategy in its Part 5 Planning Policy Framework. It does not list or discuss Core Policy 51.

2. Wiltshire's Cotswolds or 'Stone Belt'

The classic text *The Geology of Wiltshire* by R.S. Barron, in its chapter 2 *Wiltshire's Cotswolds*, quotes from H.J. Massingham's *Cotswold Country* as follows "We speak of it as a band or belt of rock laid across the back of England from the coast of West Dorset where it reaches the sea and up in a north-easterly direction through east Somerset to become, after taking a slice of north-west Wiltshire, the massif of Gloucestershire."

The escarpment of this 'slice' stands sentinel over the Clay Vale which extends as far as the Marlborough Downs and Salisbury Plain with extensive views to both.

The map below shows, in green, the Cotswolds (top left), Marlborough Downs (top right) and Salisbury Plain (bottom) and gives some indication of the extent of the views which can be had across the Clay Vale and Pewsey Vale (bottom right). The pink 'pin' at the edge of the Cotswolds shows the approximate location of the subject planning application.



And the following map, taken from *The Geology of Wiltshire* illustrates the land of the Vales (including Vale of the White Horse as well as the Clay Vale) below 91.6m (300ft) and the land of the Stone Belt and Marlborough Downs above 91.6m (300ft).

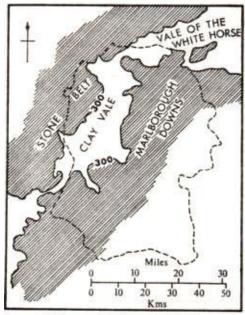


Fig. 3.1. Vales resulting from land below 300 ft, 91.6 m

There are relatively few locations where an observer may take in the easterly and southerly views from the escarpment of the Stone Belt. This is why it is important to preserve those views that we do have.

At the edge of the Stone Belt, at 95m, lies Gastard House at Chapel Knapp from which the following photo was taken across the Clay Vale with the Marlborough Downs and its western escarpment at Oliver's Castle on the horizon. Note that this view (which is 'zoomed') is from private land; there is no equivalent view from publicly accessible land.



Moving south-west across the escarpment of the Stone Belt, the next location with a view across the Clay Vale to the Marlborough Downs (and Salisbury Plain and Pewsey Vale) is Wadswick Lane at around 130m above sea level. The escarpment of the Marlborough Downs at Oliver's Castle can be seen at centre-left in the photograph below.



Further south-west and on to Norbin Barton on the South Wraxall-Kingsdown Road at 120m above sea level. There is an uninterrupted view here across the Clay Vale into Pewsey Vale with the Marlborough Downs to the left and Salisbury Plain to the right. The escarpment of the Marlborough Downs at Oliver's Castle is at the centre of the picture.



Higher now, at 162m on the Kingsdown-Monkton Farleigh Road and the following zoomed shot again show the view across the Clay Vale to the Marlborough Downs at left and centre with Pewsey Vale and Salisbury Plain to the right.



And finally to a location higher (at 183m) on the Stone Belt escarpment at Monkton Farleigh, we have the following zoomed view of the Marlborough Downs and its escarpment at Oliver's Castle.



So what do these viewpoints have in common? Well firstly, they enable long-distance views across a substantial part of Wiltshire; they are the only publicly-accessible viewpoints (apart from the Chapel Knapp viewpoint, which is private) on the Stone Belt escarpment. The views are not just of space, but of time across the Jurassic Clay Vale and the Cretaceous lower and upper greensand of Bowden Park and Bromham and the lower, middle and upper chalk of the Marlborough Downs. But significantly, none of these viewpoints is easily accessible to a casual observer. For most of north-west Wiltshire's population, they have to be reached by vehicle.

3. The significance of the Rudloe viewpoint(s)

In part 2. (all) the viewpoints from the Stone Belt escarpment were shown except two. The missing two are, in many respects, the most significant as they are the only viewpoints from public footpaths. These are the Rudloe viewpoints. One of these viewpoints is from the A4 footpath at Rudloe Firs (at 146m above sea level) – this viewpoint

is discussed, inter alia, in the 1st September 2017 article on the rudloescene website here:

https://www.rudloescene.co.uk/news/bradford-road/. And this is the viewpoint mentioned in the North Wiltshire Landscape Character Assessment discussed earlier.

The other viewpoint is from the footpath behind Springfield Close and above the Bradford Road (also at 146m). This viewpoint is discussed in **Part 1. Introduction** above. This is the important view that will be denied by the subject development.

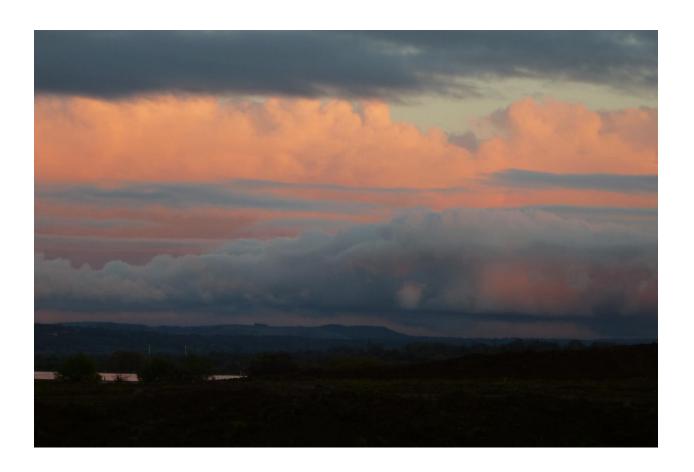
No apologies for repeating that these Rudloe viewpoints provide the only distant views of the Clay Vale, the Marlborough Downs and Salisbury Plain **from public footpaths**.

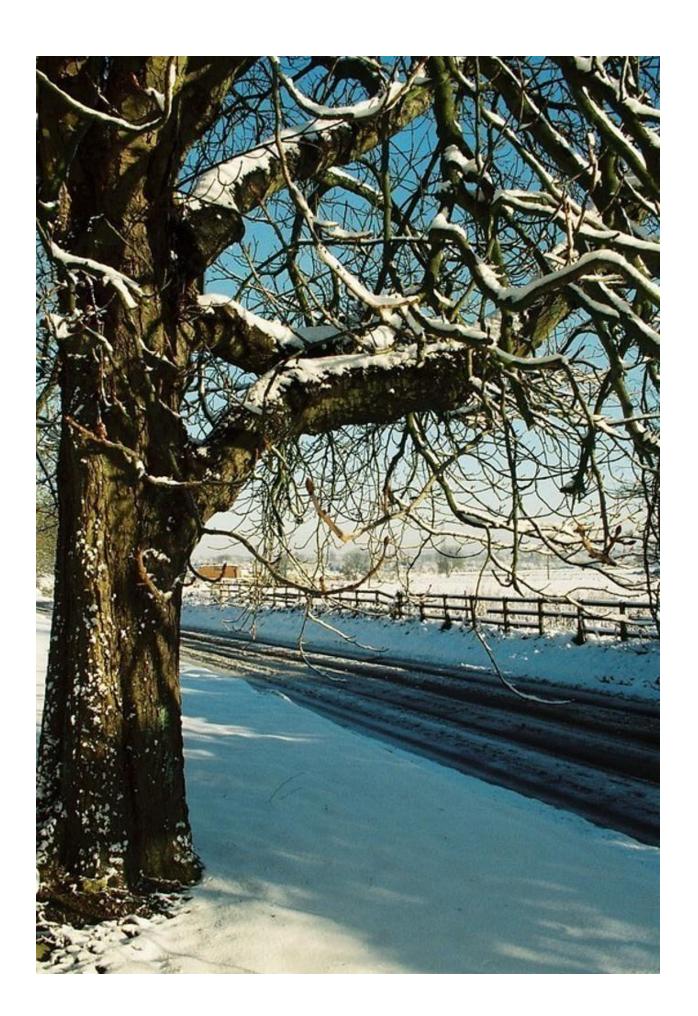
The following photographs taken from the footpath behind Springfield Close across the development site are:

- a. Dawn over the Clay Vale and the view to Salisbury Plain
- b. A zoomed summer view of Oliver's Castle and the western escarpment of the Marlborough Downs
- c. An eastern sunset over the Clay Vale
- d. Winter view towards the Marlborough Downs at the turn of the century









These are, without doubt, "important views" as designated in Wiltshire's Core Strategy Policy 51.

4. The damaging effect of the subject development

It is the irony of ironies that the Planning, Design and Access Statement from Pegasus Group, mentioned in Part 1 above, quotes in its paragraph 5.20 from the National Planning Policy Framework (NPPF) as follows: "Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit".

The "sense of place" that the people of Rudloe (and elsewhere in Wiltshire of course) have is established through the landscape and views thereof. What better sense of place could be had than to sit atop the escarpment of Salisbury Plain at the site of the Westbury White Horse or atop the escarpment of the Marlborough Downs at Oliver's Castle with the North- and West-Wiltshire landscape set out before you?

The views mentioned in the preceding paragraph are, of course, towards the west. But what of the eastward views? Well, these are the views that are the subject of this document, from the Stone Belt at Wadswick, Kingsdown, Monkton Farleigh and Rudloe across the Clay Vale to the Marlborough Downs and Salisbury Plain. These views contribute to our "sense of place".

The next photograph was taken at around the turn of the century from the footpath behind Springfield Close with the view across the Clay Vale to the Marlborough Downs. And the following photograph is an 'artist's impression' of this same view including the steel-clad buildings of the subject development.





5. Conclusion

Insufficient attention (actually, no attention) has been paid by the developers, and indeed by Wiltshire Council, to the value of "view" referenced in Core Policy 51. Dozens of pages in the Planning, Design and Access Statement are given to quoting from the NPPF and Core Strategy but nothing describes the reality of a 7.6 metre-high steel-clad building, of a type that can be found anywhere in the world, blocking an important view. And the document's author has the brass neck to suggest that this will give a "sense of place" to local people.

But it's not just the current generation that will be denied these delightful views, it will be all future generations. Effectively, these views will be lost forever.

Clearly, in the current climate of development at all costs, important values are being ridden roughshod over, trampled upon, lost. The

North Wiltshire Landscape Character Assessment's judgment that "Views from key footpaths could be developed. Views from the A4 are important and clear separation between settlements needs to be maintained eg between Corsham and Rudloe." has been lost completely in this lemming-like scramble.

In view of the exigencies of the planning system, there is no going back on the approval for this development. However, I would hope that the parameters (position, scale, height etc) of the proposed buildings could be changed (perhaps creating a 'sunken' development) in order that this generation's, and future generations' "sense of place" can be maintained.

Sincerely

Paul Turner 29 Springfield Close Rudloe Wilts SN13 oJR

21st September 2017