



Ben Warren  
Planning: Place and Growth  
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Cheltenham  
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By email only to: [ben.warren@cheltenham.gov.uk](mailto:ben.warren@cheltenham.gov.uk)

20 October 2022

Dear Ben,

**APPLICATION NO:** 22/01537/FUL

**DESCRIPTION:** Single storey extension to existing dwelling, erection of new garden room / store / gym, erection of new carport with enclosed bin store. New tennis court. Demolition of existing garage and summer house

**LOCATION:** Kyle Lodge, Greenway Lane, Charlton Kings, Cheltenham, Gloucestershire, GL52 6PN

Thank you for consulting the Cotswolds Conservation Board ('the Board') on the additional information submitted by the applicant for this proposed development that would be located within the Cotswolds National Landscape.<sup>1</sup>

In our response dated 15 September 2022 we raised a holding objection, requesting the applicant to provide further information to demonstrate compliance with Policy SD7 of the Cheltenham, Gloucester and Tewkesbury Joint Core Strategy (JCS) and consistency with the Board's Management Plan policies and other published guidance. We requested further information on whether any external lighting was proposed and a further assessment of the potential impact of the proposal on the dark skies of the National Landscape due to the substantial areas of glazing proposed. For the reasons outlined below, having reviewed the applicant's revised information, we wish to maintain our **holding objection**.

In respect of external lighting, revised plan number 22.10.011 PL006 A (received 6th October), includes details of the proposed bollard lighting to be dotted across the site but mainly either side of the access track and around the useable terraced areas. We understand that the applicant has confirmed that no external lighting is proposed for the tennis court which is welcome. Without prejudice, if the Council is minded to approve the application, we would request a condition permitting no further external lighting and limiting that shown on the plan to low-level, down-facing lights to preserve the dark skies landscape character of the Cotswolds National Landscape.

In respect of the potential impact on the dark skies of the National Landscape, the applicant's agent has undertaken an analysis and provided drawings comparing the existing south west elevation (13.4m<sup>2</sup> glazing equal to 9% of the wall area) and the proposed (21.5m<sup>2</sup> glazing equal to 12% of the wall). The applicant's view is that this would not constitute a significant increase. Whilst we acknowledge that the difference in % cover between existing and proposed is minimal and below the 50% referred to in the Chapter 9 of The South Downs National Park Dark Skies Technical Advice Note, in absolute terms this is still a 60% increase in glazed area on this elevation. The additional

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The Cotswolds National Landscape is a designated Area of Outstanding Natural Beauty (AONB), managed and looked after by the Cotswolds Conservation Board.

[cotswoldsaonb.org.uk](http://cotswoldsaonb.org.uk)

*Chairman:*  
**Brendan McCarthy**

*Vice Chair:*  
**Rebecca Charley**

information is limited to the southwest elevation, however the south east elevation of the extension to the main house and the northwest elevation of the garden room feature extensive areas of glazing including a number of velux-style windows in the garden room roof. All of these are potential sources of night-time light spill and/or glow. There is also the potential issue of reflective glint which may be created by the large glazed areas, particularly at sunrise. Despite the additional information received, we continue to take the view that the applicant has, to date, provided insufficient information on how the proposal will minimise and where possible reduce light pollution in line with Paragraph 185c of the NPPF, Policy CE5 of the AONB Management Plan 2018-2023 (and therefore by extension Policy SD7 of the Joint Core Strategy) and the advice contained within Section 2.1 of the Cotswolds AONB Landscape Strategy & Guidelines.

The applicant should also demonstrate that the proposal complies with Guidance Note 01/21 on The Reduction of Obtrusive Light, published by the Institution of Lighting Professionals (ILP) (which forms Appendix 2 of our Position Statement on Dark Skies and Artificial Light referenced in our previous response) and other relevant guidance mentioned above.

We would recommend that the relevant 'environmental zone' for which compliance should be assessed is Environmental Zone E1 which relates to AONBs. Although we recognise that the site is close to the urban fringe of Cheltenham and its associated lighting, the Guidance Note states where an area to be lit lies close to the boundary of two zones the obtrusive light limitation values used should be those applicable to the most rigorous zone (Note 1 on page 10).

Please do not hesitate to contact me if you wish to discuss this response.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S. Joyce', with a stylized flourish at the end.

Simon Joyce

**Planning Officer**

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## NOTES:

- 1) Cotswolds National Landscape is the new name for the Cotswolds Areas of Outstanding Natural Beauty (AONB). The new name takes forward one of the proposals of the Government-commissioned 'Landscapes Review' to rename AONBs as 'National Landscapes'. This change reflects the national importance of AONBs and the fact that they are safeguarded, in the national interest, for nature, people, business and culture.