

Rae Mephram
South Gloucestershire Council
Department for Place
PO Box 1954
Bristol
BS37 0DD



By email only to: planningapplications@southglos.gov.uk

16 November 2022

Dear Rae,

APPLICATION NO: P22/05909/F

DESCRIPTION: Demolition of existing outbuilding; conversion and extension of existing building to form 2 no. dwellings with a detached garage; erection of 10 no. new dwellings with associated access and landscaping works

LOCATION: Land at and north of 136 High Street, Marshfield, South Gloucestershire, SN14 8LU

Thank you for consulting the Cotswolds Conservation Board ('the Board') on this proposed development, which would be located within the Cotswolds National Landscape.¹

In reaching its planning decision, the local planning authority (LPA) has a statutory duty to have regard to the purpose of conserving and enhancing the natural beauty of the National Landscape.² The Board recommends that, in fulfilling this 'duty of regard', the LPA should: (i) ensure that planning decisions are consistent with relevant national and local planning policy and guidance; and (ii) take into account the following Board publications:

- Cotswolds Area of Outstanding Natural Beauty (AONB) Management Plan 2018-2023 ([link](#));
- Cotswolds AONB Landscape Character Assessment ([link](#)) particularly, in this instance, with regards to Landscape Character Type (LCT) 11 Dip-Slope Lowland;
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)) particularly, in this instance, with regards to LCT 11 ([link](#)), including Section 11.1;
- Cotswolds AONB Local Distinctiveness and Landscape Change, particularly, in this instance, with regards to Chapter 4 (The Built Environment) ([link](#)); and
- Cotswolds Conservation Board Position Statements ([link](#)), including the Housing Position Statement ([link](#) and [appendices](#)), Landscape-led Development Position Statement ([link](#)) and its appendices ([link](#)) and the Dark Skies and Artificial Light Position Statement ([link](#)) and its appendices ([link 1](#), [link 2 now updated in 2021](#), [link 3](#))

The Board **does not object** to this application which seeks permission to redevelop this brownfield site, though our comments below relate to some recommendations, in particular regarding lighting.

Policy CE1 of the Cotswolds AONB Management Plan 2018-2023, which is a material consideration in planning decision making, states that proposals that are likely to impact on, or create change in, the landscape of the Cotswolds AONB, should have regard to, be compatible with and reinforce the landscape character of the location, as described by the Cotswolds Conservation Board's Landscape Character Assessment and Landscape Strategy and Guidelines. They should have regard to the scenic quality of the location and its setting and ensure that views and visual amenity are conserved and enhanced.

Cotswolds Conservation Board

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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

Chairman:
Brendan McCarthy

Vice Chair:
Rebecca Charley

The Cotswolds AONB Landscape Character Assessment referred to above identifies that the site lies within Landscape Character Type 11, Dip-Slope Lowland. Section 11.1 of the Cotswolds AONB Landscape Strategy & Guidelines (LS&G) makes a number of recommendations to help address potential adverse landscape implications of the development, expansion and infilling of settlements. These include avoiding development that will intrude negatively into the landscape and cannot be successfully mitigated, ensuring new development is proportionate in scale and does not adversely affect settlement character and form and avoiding developments which incorporate standardised layouts and styles. It also promotes the conservation and restoration of existing stone buildings, the use of local stone and building styles and the visual integration of new development into its surroundings. Policy CE6 of the Management Plan also states that proposals that are likely to impact on the historic and cultural heritage of the Cotswolds AONB should have regard to these features and seek to conserve and enhance them. This should include respecting historical features, buildings, sites, layout and context, including the relationship between the existing feature or settlement and the landscape. Indeed the National Landscape's 'distinctive settlements', developed in the Cotswold vernacular, high architectural quality and integrity are one of its 'special qualities'.

Although none of the viewpoints selected within the LVA are taken from the two public rights of way which cross the fields to the north of the A420, we nonetheless broadly agree with the LVA's conclusions. The site in its current state can be considered a detracting element in terms of landscape and visual character and a development with architectural features and materials reflecting the local vernacular along with the proposed replacement and additional tree planting and repair of dry-stone walls could improve the character and appearance of the site, in particular in views from the A420 and public viewpoints to the west. The retention and restoration of the existing barn could also be beneficial. Without prejudice, if the Council is minded to grant planning permission, we would welcome the imposition of conditions securing the landscaping scheme and management plan.

The Cotswolds AONB Management Plan also identifies its dark skies as one of its 'special qualities'. The special qualities of the AONB are those aspects of the area's natural beauty which make the area distinctive and which are valuable, especially at a national level. Paragraph 185c of the NPPF states that planning decisions should ensure that new development is appropriate for its location and in doing so they should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. Paragraph 001 of the PPG on Light Pollution (Paragraph: 001 Reference ID: 31-001-20191101) states that "*intrinsically dark landscapes' are those entirely, or largely, uninterrupted by artificial light. National parks ... can serve as good examples*". As AONBs have the same level of protection with regards to landscape and scenic beauty as national parks within the NPPF and PPG and dark skies are one of the special qualities of the Cotswolds National Landscape, we consider it reasonable to treat the National Landscape as an 'intrinsically dark landscape' in NPPF and PPG terms. Policy CE5 of the AONB Management Plan states that proposals that are likely to impact on the dark skies of the AONB should have regard to these dark skies, by seeking to (i) avoid and (ii) minimise light pollution.. Section 11.1 of the LS&G also seeks to conserve dark skies and advocates the adoption of measures to minimise light pollution.

From a review of the applicant's submission, there appears to be no detail provided on lighting proposals. We recommend that the development 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 above) and other relevant guidance mentioned above. We would also recommend that the relevant 'environmental zone' for which compliance should be assessed is Environmental Zone E1 which relates to AONBs.

Therefore, and without prejudice, if the local authority is minded to grant planning permission, planning conditions should be imposed which seek to mitigate any adverse impact and ensure that all

lighting meets the standards outlined above and will be limited to low-level, down-facing lights to preserve the landscape character of the Cotswolds National Landscape.

Please don't hesitate to contact me if you wish to discuss this response further.

Yours sincerely,

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

Simon Joyce

Planning Officer

simon.joyce@cotswoldsaonb.org.uk | 07808 391227

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.
- 2) Section 85 of the Countryside and Rights of Way Act 2000.
www.legislation.gov.uk/ukpga/2000/37/section/85
- 3) The documents referred to in our response can be located on the Cotswolds National Landscape website under the following sections
 - a. Cotswolds Area of Outstanding Natural Beauty (AONB) Management Plan 2018-2023
www.cotswoldsaonb.org.uk/management-plan
 - b. Cotswolds AONB Landscape Character Assessment
www.cotswoldsaonb.org.uk/lca
 - c. Cotswolds AONB Landscape Strategy and Guidelines
www.cotswoldsaonb.org.uk/lsg
 - d. Cotswolds AONB Local Distinctiveness and Landscape Change
www.cotswoldsaonb.org.uk/ldlc
 - e. Cotswolds Conservation Board Position Statements
www.cotswoldsaonb.org.uk/ps1
www.cotswoldsaonb.org.uk/ps2