



Nick Gardiner
Stroud District Council
Ebley Mill
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Stroud
Gloucestershire
GL5 4UB

By email only to: nick.gardiner@stroud.gov.uk

16 November 2022

Dear Nick,

APPLICATION NO: S.22/2409/FUL

DESCRIPTION: Refurbishment and extension of existing dwelling and proposed construction of 2no. two storey, four-bedroom dwellings with associated parking provision, refuse/recycling facilities and cycle storage

LOCATION: 4 Ferndale Road, Whiteshill, Stroud, Gloucestershire

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 publications³:

- 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) 8 (High Wold Valley);
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)) particularly, in this instance, with regards to LCT 8 ([link](#)) including Section 8.1;
- Cotswolds AONB Local Distinctiveness and Landscape Change ([link](#)) particularly, in this instance, with regards to Chapter 4 (The Built Environment) ([link](#)); and
- Cotswolds Conservation Board Position Statements ([link](#)) in particular 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 application site is located off Victory Road within the settlement of Whiteshill and comprises garden land associated with No. 4 Ferndale Cottages. We understand that the site is subject to an extant planning consent for two new dwellings (ref. S.20/1915/OUT) and this application seeks to reorientate the dwellings and extend the existing dwelling of No. 4 Ferndale Cottages.

Whilst the site is located within the National Landscape, it is surrounded by development and is not an exposed site on the edge of settlement and the site is not a prominent feature in local views. Therefore, the proposed new dwellings and extension to the existing dwelling would be viewed in the

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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

context of the current surrounding development and are not considered to harm the natural beauty of the National Landscape. Accordingly, the Board **does not object** to this application.

Please do not hesitate to contact me if you require any further information or wish to discuss this response.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'S. Joyce', written on a light grey background.

Simon Joyce

Planning Officer

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ANNEX 1 COTSWOLDS NATIONAL LANDSCAPE CONSULTATION RESPONSE IN RELATION TO PLANNING APPLICATION S.22/2130/FUL

Paragraphs 174 and 176 of the National Planning Policy Framework ('NPPF') provide the highest status of protection for the landscape and scenic beauty of AONBs, including the Cotswolds National Landscape.

Paragraph 174 states that planning decisions should both contribute to and enhance the natural environment by protecting and enhancing valued landscapes in a manner commensurate with their statutory status or identified quality in the development plan. Paragraph 176 then outlines the 'great weight' to be given to the conservation and enhancement of the landscape and scenic beauty of AONBs.

Cultural heritage impact

Natural England's 'Guidance for assessing landscapes for designation as National Park or AONB in England' identifies six factors that contribute to the natural beauty of AONBs⁴. One of these is cultural heritage which includes amongst other things, the presence of settlements that make a particular contribution to distinctive sense of place and the visible presence of historic landscape types or specific elements that provide evidence of historic influence on the landscape. As such, the conservation and enhancement of cultural heritage assets such as Conservation Areas forms part of the statutory 'duty of regard' referred to above. Accordingly, the AONB designation recognises the importance of the historic environment and reinforces the need to protect characteristic features and their interaction with the landscape.

Stroud Local Plan Delivery Policy ES7 states that priority will be given to the conservation and enhancement of the natural and scenic beauty of the landscape whilst taking account of the biodiversity interest and the historic and cultural heritage. The supporting text of Delivery Policy ES7 states that proposals for development within or affecting the AONB will be expected to have regard to the Cotswold Conservation Board Management Plan, which is a material consideration in the determination of this application.

Policy CE1 of the Cotswolds AONB Management Plan 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 ('LCA') and Landscape Strategy and Guidelines ('LS&G'). Policy CE6 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.

The site is located within Landscape Character Type 5 Settled Valleys which the LS&G identifies as being *"under particular pressure from the outward expansion of existing urban areas onto the steep, highly visible valley sides"* and Section 5.1 cites the *"interruption, weakening or loss of the historic character of settlements"* as a potential adverse implication of development such as this.

The Board shares the view expressed by the Council's Conservation Officer in their consultation response that the proposed development would weaken the historic character of the Conservation Area due to its scale, massing and appearance. This would not be compatible with the advice found within the LS&G. Whilst it is acknowledged that a previous approval for two cottages exists, we agree with the Conservation Officer's view that they would have been more reflective of the surrounding built form.

Light pollution/dark skies

Light pollution occurs in the form of light trespass where light shines where not needed, sky glow where light appears over towns and cities and glare, which is the uncomfortable reaction when a light source is viewed within a dark atmosphere. These all contribute to the erosion of 'dark skies' and the ability to view the stars at night

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 Planning Practice Guidance (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. The Cotswolds AONB Landscape Strategy & Guidelines for LCT 5 (Section 5.1) referred to above identifies the 'spread of lit elements up the valley slopes' and the 'potential for glint from buildings, particularly on hillsides' as potential adverse implications of development such as this. The guidelines seek to 'adopt measures to minimise and where possible reduce light pollution'.

As such, the introduction of any lit elements should be designed to adhere to this guidance and, by extension, with the policies of the Cotswolds AONB Management Plan in particular Policy CE5 (Dark Skies) which states that proposals that are likely to impact on the dark skies of the Cotswolds AONB should have regard to these dark skies, by seeking to (i) avoid and (ii) minimise light pollution. Chapter 9 of The South Downs National Park Dark Skies Technical Advice Note ([link](#), page 44), which is considered by National Park Authorities and AONB Boards to be best practice for protected landscapes in relation to this issue, also advises that large (>50% on a single elevation) single areas of glazing should be avoided in protected landscapes.

The proposed dwelling features extensive glazed areas, particularly on the southern and eastern elevation, along with a large lightwell at the rear. 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 and glass balustrade, particularly at sunrise.

In the first instance we would request that the applicant provides further information on how the proposal will minimise and where possible reduce light pollution. 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 above) 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.

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

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
- 4) Natural England (2011) Guidance for assessing landscapes for designation as National Park or AONB in England ([link](#)). Table 3.