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By email only to: [helen.cooper@stroud.gov.uk](mailto:helen.cooper@stroud.gov.uk)

23 January 2023

Dear Helen,

**APPLICATION NO:** 2022/0728/EIAS

**DESCRIPTION:** EIA Screening request for installation of a solar farm, including solar panels, inverter cabins, associated infrastructure and landscaping works

**LOCATION:** Land adjoining Stroud Road, Whaddon, Gloucester

Thank you for consulting the Cotswolds National Landscape Board<sup>1</sup> on this proposed development, which would be located within the setting of the Cotswolds National Landscape<sup>2</sup>.

The Board has reviewed the information submitted in the scoping report from the applicant and considers that this development could potentially have an impact upon the Cotswolds National Landscape. The development boundary lies approximately 530m from the National Landscape boundary and given the scale of the development proposed (a solar farm covering almost 12 hectares) and the long-ranging views westwards from the Cotswold escarpment, this proposal could potentially be a significant addition to views to and from the National Landscape.

At such a distance, we would consider that the development would be located within the setting of the National Landscape. It should be noted that case law has clarified that great weight should be given to the extent to which development outside an Area of Outstanding Natural Beauty (AONB) adversely affects views from the AONB, in line with paragraph 176 of the National Planning Policy Framework (NPPF). Further guidance on this issue is provided in the Board's Position Statement on 'Development in the Setting of the Cotswolds AONB' (see link above). Policy CE1 of the Cotswolds AONB Management Plan states that development proposals should ensure that views – including those into and out of the AONB – and visual amenity are conserved and enhanced.

**The Board therefore considers that an EIA should be required** and that Landscape and Visual matters are to be scoped into the Environmental Statement (ES). Should the Council consider that EIA is not required, we agree with the applicant's statement at paragraph 4.2.1 of their Screening and Scoping report that a subsequent planning application should be supported by and informed by a full Landscape and Visual Impact Assessment (LVIA). We recommend that this should include an assessment of any impact on visual receptors located within the elevated landscape of the Cotswold escarpment. As such, the ES/LVIA submitted in support of any forthcoming application should have regard to the potential impacts of the proposed development on the National Landscape, including relevant 'special qualities' of the National Landscape<sup>3</sup>. We recommend that the application considers:

#### Cotswolds Conservation Board

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[info@cotswoldsaonb.org.uk](mailto:info@cotswoldsaonb.org.uk)

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**

- the landscape and visual impact of the proposed solar farm upon the National Landscape and its setting, including the impact upon any views from within the National Landscape, particularly from the Escarpment, from footpaths EBR12, EBR13, MPA3 and rights of way at Cud Hill and Spoonbed Hill or towards the National Landscape (for example from footpath EBR15). It should in particular include an assessment of winter-time conditions when there would be less vegetation to screen the development. It should also include consideration of glint or glare caused by the reflection of sunlight off the solar panels during daylight hours. Photomontages from key viewpoints would be recommended.
- the dark skies of the National Landscape, including potential increases in light pollution and the introduction of lit elements into the night time landscape;
- the internationally important flower-rich grasslands and ancient broadleaved woodlands of the National Landscape, in particular, the Cotswolds Beechwoods Special Area of Conservation (SAC); and
- the heritage assets of the National Landscape, and their settings, including relevant listed buildings.

Further guidance on relevant considerations is provided in the following Board publications<sup>4</sup>:

- Cotswolds Area of Outstanding Natural Beauty (AONB) Management Plan 2018-2023 ([link](#)) and in particular Policy CE1 (Landscape);
- Cotswolds AONB Landscape Character Assessment ([link](#)), particularly, in this instance, with regards to the 'key features / characteristics' of Landscape Character Types (LCT) 18 (Settled Unwooded Vale), 2 (Escarpment) and 8 (High Wold Valley);
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)), particularly, in this instance, with regards to regards to LCT 18 ([link](#)), including Section 18.4, LCT 2 ([link](#)) including Section 2.4 and LCT 8 ([link](#)) including Section 8.4;
- Cotswolds Conservation Board Position Statements ([link](#)) particularly, in this instance, with regards to the Renewable Energy Position Statement ([link](#)), Development in the Setting of the AONB ([link](#)) and Tranquillity Position Statement ([link](#)) sections 4.4 and 5.2; and
- Cotswolds National Landscape Climate Change Strategy ([link](#))

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

Yours sincerely,



Simon Joyce  
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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.
- 2) The name used for the organisation associated with the AONB designation is the Cotswolds National Landscape Board. At times this is abbreviated to National Landscape Board or The Board. The legal name of the organisation remains the Cotswolds Conservation Board but this name is no longer used in most circumstances.
- 3) The 'special qualities' of the Cotswolds National Landscape are listed in Chapter 2 of the Cotswolds AONB Management Plan 2018-2023. The special qualities of the National Landscape are:
  - the aspects of the area's natural beauty which make the area particularly distinctive and valuable, especially at a national scale;
  - the key attributes on which the priorities for the area's conservation, enhancement and management should be based.
- 4) 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](http://www.cotswoldsaonb.org.uk/management-plan)
  - b. Cotswolds AONB Landscape Character Assessment  
[www.cotswoldsaonb.org.uk/lca](http://www.cotswoldsaonb.org.uk/lca)
  - c. Cotswolds AONB Landscape Strategy and Guidelines  
[www.cotswoldsaonb.org.uk/lsg](http://www.cotswoldsaonb.org.uk/lsg)
  - d. Cotswolds AONB Local Distinctiveness and Landscape Change  
[www.cotswoldsaonb.org.uk/ldlc](http://www.cotswoldsaonb.org.uk/ldlc)
  - e. Cotswolds Conservation Board Position Statements  
[www.cotswoldsaonb.org.uk/ps1](http://www.cotswoldsaonb.org.uk/ps1)  
[www.cotswoldsaonb.org.uk/ps2](http://www.cotswoldsaonb.org.uk/ps2)