



James Lloyd  
Development Services  
Tewkesbury Borough Council  
Gloucester Road  
Tewkesbury  
Gloucestershire  
GL20 5TT

By email only to: [james.lloyd@tewkesbury.gov.uk](mailto:james.lloyd@tewkesbury.gov.uk)

30 March 2023

Dear James,

**APPLICATION NO:** 23/00204/FUL

**DESCRIPTION:** Proposed Rural Exception Site comprising of 26 affordable homes and associated works.

**LOCATION:** Land on the south side of Dibden Lane, Alderton, Tewkesbury, Gloucestershire

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

The Board recognises the importance of meeting local housing requirements and supports the delivery of affordable housing within the National Landscape and its setting. However, this affordable housing should be delivered in a way that is compatible with the statutory purpose of AONB designation, which is to conserve and enhance the natural beauty of the AONB.

In this instance, we consider that the proposed development would have a significant adverse impact on the natural beauty of the Cotswolds National Landscape, particularly with regards to the impact on views from within the National Landscape. We consider that this significant adverse impact provides a clear reason for refusal as the proposal is not consistent with policy SD7 of the Joint Core Strategy, RES6 and LAN1 of the Tewkesbury Local Plan, paragraph 176 of the NPPF and policy CE1 of the Cotswolds AONB Management Plan 2023-2025. As such, we **object** to this application.

Despite the applicant's position that the proposal complies with relevant policies of the Development Plan, and for avoidance of doubt, we acknowledge that a recent appeal decision has concluded that Tewkesbury Borough Council is currently unable to demonstrate a five-year supply of deliverable housing sites. However, we consider that the significant adverse impacts of the proposed development provide a clear reason for refusal in NPPF paragraph 11di) terms. Therefore, we consider that the presumption in favour of granting planning permission (i.e. the 'tilted balance') should be disapplied with a clear reason for refusal present in that the proposal would neither conserve nor enhance the landscape and scenic beauty of the National Landscape.

Notwithstanding this objection on landscape and visual impact grounds, we also request further information to assist our assessment of any potential adverse impacts of the proposal on the tranquillity and dark skies of the Cotswolds National Landscape. These are 'special qualities' of the Cotswolds National Landscape, those being the features of the AONB that makes the area so

**Cotswolds Conservation Board**

The Old Prison, Fosse Way, Northleach  
Gloucestershire GL54 3JH  
01451 862000  
[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**

outstanding that it is in the nation's interest to safeguard it. Further detail is provided in the Annex below.

The submission of the further information requested below will allow the Board to draw a more definitive conclusion on the potential impacts of the scheme.

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 stylized flourish at the end.

Simon Joyce

**Planning Officer**

[simon.joyce@cotswoldsaonb.org.uk](mailto:simon.joyce@cotswoldsaonb.org.uk) | 07808 391227

## ANNEX 1 COTSWOLDS NATIONAL LANDSCAPE CONSULTATION RESPONSE IN RELATION TO PLANNING APPLICATION 23/00204/FUL

The comments below are based on a review of the information submitted by the applicant, including the Landscape and Visual Appraisal ('LVA', Zebra Landscape Architects, December 2022).

### Planning Policy Considerations

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.<sup>3</sup> 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<sup>4</sup>:

- Cotswolds Area of Outstanding Natural Beauty (AONB) Management Plan 2023-2025 ([link](#));
- Cotswolds AONB Landscape Character Assessment ([link](#)) particularly, in this instance, with regards to Landscape Character Types (LCT) 19 (Unwooded Vale) and 1 (Escarpment Outliers);
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)) particularly, in this instance, regards to LCT 19 ([link](#)) including Section 19.1 and LCT 1 ([link](#)) including Section 1.1;
- Cotswolds AONB Local Distinctiveness and Landscape Change ([link](#));
- Cotswolds Conservation Board Position Statements ([link](#)) particularly, in this instance, with regards to Development in the Setting of the AONB ([link](#)), Landscape-Led Development ([link](#)), Tranquillity ([link](#)) and Dark Skies and Artificial Light Position Statement ([link](#)) and its appendices ([link 1](#), [link 2](#), [link 3](#)).

### *National Planning Policy Framework (July 2021) and development within the setting of the Cotswolds National Landscape*

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. This 'great weight' is relevant in this instance as the site forms part of the AONB's setting and a development of the scale proposed in this location could have a significant adverse impact on its landscape and visual character and quality.

Furthermore, the requirement that development within the setting of AONBs "*should be sensitively located and designed to avoid and minimise adverse impacts on the designated areas*" was also added into paragraph 176 with the publication of the current NPPF in July 2021. Therefore, any adverse effects on the AONB need to be assessed properly and fully taken into account when determining this application, with the appropriate weighting applied in the decision.

The Board's Position Statement on Development in the Setting of the AONB referred to above outlines how the surroundings of the Cotswolds National Landscape are also important to its landscape character and quality. Development proposals that affect both views into and out of the

AONB need to be carefully assessed to ensure that they conserve and enhance the natural beauty and landscape character of the AONB.

The National Planning Policy Guidance ('NPPG', 2014) also confirms in relation to the Section 85 duty<sup>3</sup> that *"The duty is relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which might have an impact on the setting of, and implementation of, the statutory purposes of these protected areas."*

A High Court decision (*Stroud District Council v Secretary of State for Communities and Local Government (Gladman Development Ltd)* February 2015) helps to confirm the application of what is now paragraph 176 of the NPPF as far as 'great weight' is concerned. Mr Justice Ouseley stated in this case that paragraph 115 (now paragraph 176) of the NPPF *"certainly covers the impact on the scenic beauty of the land actually within the AONB. It seems to me that it would be unduly restrictive to say that it could not cover the impact of land viewed in conjunction with the AONB from the AONB. But to go so far as to say that it must also cover land from which the AONB can be seen and great weight must be given to the conservation of beauty in the AONB by reference to that impact reads too much into paragraph 115."*

The above decision helps to clarify that there are differing ways of assessing impacts on the setting of the AONB which require the application of different policies and guidance: (i) harm directly to land in the designated AONB itself from views out of the AONB and between parts of the AONB towards new development in its setting (where paragraph 176 of the NPPF is relevant) and: (ii) as a separate material consideration, harm to land outside the designated AONB, for example views of new development in the context or backdrop of the AONB (where paragraph 176 is not relevant).

Any impact upon views back towards the AONB, from outside the AONB, may be a separate material consideration and subject to separate policy and guidance, for example paragraph 174 of the NPPF also states that planning decisions should 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.

#### *Adopted Development Plan*

As far as adopted Development Plan policy relating to landscape issues is concerned, Policy SD6 of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy identifies that development proposals are required to consider the landscape and visual sensitivity of the area in which they are to be located or which they may affect, and have regard to local landscape distinctiveness. Policy SD7: The Cotswolds Area of Outstanding Natural Beauty (AONB) identifies that proposals within the setting of the Cotswolds AONB are required to conserve and, where appropriate, enhance its landscape, scenic beauty, wildlife, cultural heritage and other special qualities.

The Tewkesbury Borough Plan 2011-2031 was adopted on 8 June 2022. This plan reinstates a defined settlement boundary at Alderton. This site lies outside of the village's settlement boundary. Policy RES6 Rural Exception Sites states that proposals for affordable housing development on rural exception sites within, or on the edge of, a rural settlement will be permitted provided, *inter alia*, that the design and layout of the proposal respects the rural character of the area and can be satisfactorily integrated into the surrounding landscape.

Policy LAN1 also states that where a proposal would result in harm to the Special Landscape Area having regard to the criteria contained within the policy, this harm should be weighed against the need for, and benefits from, the proposed development. Proposals causing harm to the Special

Landscape Area will only be permitted where the benefits from the development would clearly and demonstrably outweigh the identified harm.

At the local level, the Alderton Neighbourhood Development Plan Policy LC2 requires applications such as this to show how design and siting have taken into consideration any adverse impacts on areas of landscape and visual sensitivity, in particular ensuring that special attention is paid to preserving significant views in or out of the settlement, or including mitigation measures that ensure such views are maintained as fully as possible. External lighting should be minimised to avoid light pollution. Street lighting is not supported in any area of the Parish.

#### *Cotswolds AONB Management Plan*

The Cotswolds AONB Management Plan 2023-2025, which is a material consideration in planning decision making, identifies the tranquillity of the area and its dark skies as two 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. They are also the key attributes on which the priorities for the AONB's conservation, enhancement and management should be based.

Policy CE1 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. There should be a presumption against the loss of key characteristics identified in the landscape character assessment. Proposals should have regard to the scenic quality of the location and its setting and ensure that views – including those into and out of the AONB – and visual amenity are conserved and enhanced.

The Board's Tranquillity Position Statement referenced above recommends that proposals that have the potential to impact on the tranquillity of the AONB accord with Policy CE4 of the Cotswolds AONB Management Plan 2023-2025, gives great weight to conserving and enhancing the tranquillity of the AONB and assess potential impacts on tranquillity, particularly with regards to noise, vehicle movements and landscape and visual impacts.

Policy CE5 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. Policy CE10 states that development and transport in the Cotswolds AONB and in the setting of the AONB should have regard to – and help to deliver – the purposes of conserving and enhancing the natural beauty of the AONB and increasing the understanding and enjoyment of the AONB's special qualities. They should also contribute to the economic and social well-being of AONB communities. Proposals relating to development and transport in the Cotswolds AONB and in the setting of the AONB should comply with national planning policy and guidance. They should also have regard to – and help to deliver – the Cotswolds AONB Management Plan and be compatible with guidance produced by the Cotswolds Conservation Board, including the: (i) Cotswolds AONB Landscape Strategy and Guidelines; (ii) Cotswolds AONB Landscape Character Assessment; (iii) Cotswolds AONB Local Distinctiveness and Landscape Change; and (iv) Cotswolds Conservation Board Position Statements.

Section 19.1 of the Cotswolds AONB Landscape Strategy and Guidelines ('LS&G') identifies 'development and expansion of settlements' within the Unwooded Vale LCT as a 'local force for change' and highlights the 'intrusion of expanded settlement fringes into the landscape including within the setting of the AONB' and the 'proliferation of suburban building styles, housing estate layout' as two potential adverse landscape implications of development such as this. It also recommends the maintenance of the open, sparsely settled character of the Unwooded Vale by limiting new development to existing settlements and avoiding development between existing

villages, avoiding development that will intrude negatively into the landscape and cannot be successfully mitigated, for example, extensions to settlements in areas of open landscape. It also recommends ensuring that new development does not adversely affect the wider rural landscape and views to and from the AONB and ensuring that new development is proportionate and does not overwhelm the existing development.

### **Landscape and Visual Impact**

As outlined above, NPPF paragraph 176 states that great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs and that development within the setting of AONBs should be sensitively located and designed to avoid and minimise adverse impacts on the designated areas. The case law referred to above has clarified that this includes giving great weight to the impact of development outside an AONB on views out from within the AONB. This clarification has been reiterated in the recent planning appeal decision relating to the proposed development of up to 50 dwellings at Land off Ashmead Drive, Gotherington<sup>5</sup>.

The Cotswolds National Landscape covers Alderton Hill and Dumbleton Hill to the north of the village and extends down to its boundary on the northern edge of Alderton. In this particular location the National Landscape's boundary extends to the southern side of Dibden Lane to the site boundary, as shown at Image 2.2 of the applicant's LVA. To the south of Alderton, Langley Hill, Dixon Hill and Oxenton Hill are also part of the National Landscape and the land between these outliers, known as the Teddington and Greet Vale, is designated as a Special Landscape Area (SLA) in the Tewkesbury Borough Plan.

The Government's planning practice guidance on Natural Environment (paragraph 042) recognises that development in the setting of an AONB can potentially do significant harm to the landscape and scenic beauty of the AONB (to which great weight must be attached), especially where long views from or to the designated landscape are identified as important or where the landscape character of land within and adjoining the designated area is complementary.

The site forms part of a Special Landscape Area (SLA) and lies adjacent to the National Landscape. The newly-adopted Tewkesbury Borough Plan states at paragraph 8.3 that SLAs 'are defined where the topography is a continuation of the adjacent AONB and / or where the vegetation and associated features are characteristic of the AONB'. SLAs 'play a role in protected the foreground setting of the adjacent Cotswolds AONB' and are considered by the LPA to be a valued landscape having regard to paragraph 174 of the NPPF. We consider that this description is appropriate in regards to this site. The Tewkesbury Borough Council Landscape and Visual Sensitivity Study (2014) also assessed the area that the site falls within to have a high sensitivity to visual effects.

A key issue in respect of this application is the impact of the proposed development on the visual connectivity between areas within the AONB, when viewed both to and from the AONB. The relatively undeveloped nature of the land between Langley, Dixon and Oxenton Hills to the south and Alderton Hill to the north helps to maintain this geological and visual link. Other landscape and visual sensitivities include the perception of settlement shape and form from elevated vantage points, the influence of developments in views from public rights of way (in particular the promoted Winchcombe Way route) and the perception of separation between Alderton and the B4077.

Whilst the applicant's Planning Statement mentions two previously withdrawn applications for major residential development on this site in recent years (refs. 18/00338/OUT and 19/00781/OUT), these are not considered within the LVA which instead devotes time to considering the findings of studies supporting planning applications and appeals concerning other sites in the village a greater distance away from the National Landscape boundary.

Whilst the LVA makes no mention of any previous assessments of this site in terms of potential landscape and visual impacts of residential development, of particular relevance is the Council's Landscape Officer's response to the previous application 19/00781/OUT. Here the Landscape Officer highlights the *"Particular landscape and visual sensitivities relevant here include the perception of settlement shape and form from elevated vantages. The influence of development in views from valued long distance routes, potential impacts on the "setting" of the AONB and in the case of this eastern edge of Alderton, the perception of sprawl along the lower slopes of Alderton Hill and the visual setting of the village, the church and its environs"*. The Landscape Officer also describes how the site plays an important role in the foreground setting of the AONB at Alderton Hill and how the site is clearly visible from the B4077 and Dibden Lane and in elevated views from Oxenton Hill and Langley Hill. It is also visible from the Winchcombe Way as it descends from Alderton Hill.

The Officer considered that proposed development (which occupied the same part of the field as this proposal) would be seen as an eastwards expansion of Alderton beyond an established well-treed edge into open countryside. Moreover, that extension would extend along the base of Alderton Hill and intrude into the foreground setting of the AONB. Following a visit to the site and surrounding area by the Board's Planning Officer in March 2023 we consider this assessment is equally applicable to this proposal.

The Landscape Officer concluded by highlighting the *"numerous new estate developments in recent years to the south and west... Cumulatively and in combination, these developments have substantially altered the settlement pattern and the extent to which the village is visible and influences the local landscape character. Alderton sits immediately adjacent to the AONB boundary at the base of Alderton Hill. It lies in a narrow vale between the Cotswold Scarp and the outlier at Alderton Hill. The role this landscape plays in contributing to the foreground setting of the AONB is reflected in the designation of Special Landscape Area. Cumulatively and in combination, the continuing piecemeal expansion of Alderton is harming characteristics of the landscape that are valued. This development would not "protect and enhance" features of the landscape that are of local significance and would harm the setting of the AONB...On its own this proposed development would create a conspicuous expansion of Alderton into open countryside at the base of Alderton Hill and would harm the foreground setting of the AONB. In combination with the other extensive developments around Alderton, it represents further urbanisation of this narrow vale within the SLA between the Cotswold Scarp and the Outlier at Alderton Hill."* (emphasis added).

Further major residential development at Alderton has been allowed at appeal since the Landscape Officer provided the above assessment and now two more major residential developments in the village are currently under consideration with one at application stage and the other at appeal. Notwithstanding our previous responses to these other applications in Alderton, it is our view that the proposed development of this site would likely have a greater adverse impact on the setting of the National Landscape than these other schemes due to the immediate proximity of the site to the nationally protected landscape and its prominence in views to and from the National Landscape, in particular from the Winchcombe Way. Therefore, we consider that the above assessment is equally, if not more, valid now in respect of this current proposal. We also note that the site shares little direct connection with the village due to its separation from Gretton View on its western boundary due to the presence of intervening paddock land.

The LVA considers a number of viewpoints within the Cotswolds National Landscape (viewpoints 1, 2, 3, 4, 7, 8, 10 and 12, though viewpoint 10 is incorrectly shown on the viewpoint maps at Appendix 1). However we consider that the LVA underestimates the assessed magnitude of change and consequent level of effect on views to and in particular from the National Landscape as a result of the development.

We agree with the LVA's assessment at Table 7.1 and in the text that receptors at viewpoints within the National Landscape would be of 'very high' visual sensitivity. However, we disagree with the assessment that, at worst, the magnitude of change at completion would be 'slight' resulting in, at worst, a 'moderate, adverse' level of effect, reducing to 'moderate/minor adverse' by year 15. Given the elevated views of the site, particularly from the Winchcombe Way within the National Landscape (and in particular when travelling south between viewpoints 2 and 3) and in the absence of any visualisations, we consider that the dwellings would still be clearly visible despite their 1-1.5 storey height and proposed landscaping.

Notwithstanding the accepted caveat that LVA matrices are not designed to be prescriptive tools, and the methodology and analysis of potential effects at any particular location must allow for the exercise of professional judgement, it is difficult to provide an assessment based upon the matrix tables contained in the methodology as 'very high' visual sensitivity is not shown. Table A2 shows that a 'high' sensitivity receptor and 'slight' magnitude of change might result in a 'moderate' significance of effect. Therefore, it would be logical that the 'very high' sensitivity and 'slight' magnitude assessed here by the LVA would result in a significance of effect greater than 'moderate', i.e. 'major/moderate'. We would consider such an effect as likely to be significant in planning terms<sup>6</sup>. We consider that the overall significance of effect in views from within the National Landscape experienced at viewpoints along the Winchcombe Way and other footpaths would be at least 'major/moderate' and therefore the development would have a significant adverse impact on these views, the conservation and enhancement of which are subject to 'great weight' in national planning policy terms.

Therefore, we consider that the proposal would not conserve or enhance the landscape and scenic beauty of the National Landscape and that is not sensitively located and designed as to avoid and minimise adverse impacts in line with the requirements of paragraph 176 of the NPPF. As such the application is not consistent with policy SD7 of the Joint Core Strategy, RES6 and LAN1 of the Tewkesbury Local Plan, paragraph 176 of the NPPF, policy CE1 of the Cotswolds AONB Management Plan 2023-2025, section 19.1 of the Cotswolds AONB LS&G and should be refused.

Without prejudice, if the Council is minded to grant planning permission, we would welcome conditions securing a landscaping scheme and management plan along with appropriately recessive roof materials to ensure that the landscape and visual impact of the scheme is mitigated as far as possible.

## **Tranquillity**

Tranquillity is another of the 'special qualities' of the Cotswolds National Landscape, being one of the features of the Cotswolds that makes the area so outstanding that it is in the nation's interest to safeguard it. The Cotswolds National Landscape has relatively high levels of tranquillity, especially when compared with the surrounding urban areas, though we acknowledge that both the relative tranquillity and dark skies of the AONB are affected by the noise and artificial lighting of the neighbouring built environment. However, the present undeveloped nature of the site helps to prevent the further erosion of these special qualities, which may occur if planning permission were granted and, in our view, the potential impact on the tranquillity of the AONB has not been adequately assessed by the applicant.

Section 4.5 of the Board's Tranquillity Position Statement outlines how The Institute of Environmental Assessment's 'Guidelines for the Environmental Assessment of Road Traffic' recommends using two 'rules of thumb' for identifying the scale at which increases in traffic movements should be considered in an Environmental Impact Assessment (EIA):

- Rule 1: Where traffic flows will increase by more than 30% (or the number of heavy goods vehicles (HGVs) will increase by more than 30%).
- Rule 2: Any other sensitive areas where traffic flows have increased by 10% or more.

AONBs are specifically identified as ‘sensitive areas’ in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. As such, Rule 2 should be applied in the Cotswolds AONB and should relate to both traffic flows and HGV movements. On this basis, it can be argued that an increase in traffic flows or HGV movements of more than 10% from a development proposal or in combination with other proposals is likely to be significant and have an adverse impact on the tranquillity of the Cotswolds AONB.

However, the information submitted in support of the application fails to consider or quantify the potential impact of traffic generated by the development on the AONB and its tranquillity or the cumulative impact of this and the other developments consented or awaiting determination nearby. We would request that this is addressed by the applicant. In this respect we would highlight a recent appeal decision relating to proposed developments within the setting of the National Landscape at Mitton (appeal refs. 3301732 and 3301742, dated 25 November 2022), around 7 miles west of the site. These appeals were refused as the Inspector was not satisfied that the submitted transport assessment had been undertaken using a sufficiently robust approach so that he could be confident that the developments would not result in a severe residual cumulative impact on the road network, or that the tranquillity of the National Landscape would not be unacceptably harmed.

## Lighting

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 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.

The application does not appear to consider potential dark skies impacts in relation to the AONB and the applicant is requested to provide further consideration of this issue. The applicant is encouraged to refer to the Board’s guidance in relation to artificial light and dark skies contained in our Position Statement referred to above.

## Other matters

The Board is aware that the village of Alderton has grown significantly in recent years with developments for 47 homes south of Beckford Road, 24 dwellings to the east of Willow Bank Road and 28 dwellings to the south of Fletcher Close granted at appeal. The Board has also raised a holding

objection to the application ref. 22/00624/OUT for 48 dwellings east of St. Margaret's Drive which is currently the subject of a S.78 appeal and has responded to the current application for 56 dwellings off Willow Bank Road (appn. ref. 22/00998/FUL).

Therefore, this application, combined with these recent permissions and applications raises the prospect of more than 235 additional dwellings being built in the village which would constitute a 75% increase over the 308 households recorded in Alderton Parish in the 2011 Census. Whilst we recognise that new residents may help to sustain local services such as the shop and school, we are becoming increasingly concerned regarding the cumulative impact of development on the village and its infrastructure, particularly when the cumulative impact of a smaller quantum of development was one of the reasons the appeal Inspector dismissed the previous application for residential development at the Willow Bank Road site. We would request that in determining this application, the Council satisfies itself that the potential expansion of the village is proportionate and sustainable.

### **Recommendation**

Notwithstanding our objection on landscape and visual grounds, for completeness we would request that the applicant provides the following further information to allow us to fully assess the potential impacts of the proposal on the setting of the AONB and to draw a more definitive conclusion on the potential impacts of the scheme and whether, in our view, the application complies with the requirements of national and local planning policy and guidance:

- An assessment of the potential impact of traffic generated by the development on the AONB and its tranquillity or the cumulative impact of this and the other developments consented or allocated nearby; and
- A consideration of the potential dark skies impacts in relation to the AONB.

## 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) Section 85 of the Countryside and Rights of Way Act 2000.  
[www.legislation.gov.uk/ukpga/2000/37/section/85](http://www.legislation.gov.uk/ukpga/2000/37/section/85)
- 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)
- 5) Planning appeal APP/G1630/W/20/3256319 (relating to planning application 19/01071/OUT). Paragraph 28 is particularly relevant in this regard.
- 6) An example can be found in the methodology for the Environmental Statement for the A417 Missing Link DCO application ([link](#)) at paragraph 4.5.17: *"In terms of the EIA Regulations, 'significant' effects are generally those where the significance of the effect is 'moderate' or greater"*.