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By email only to: [Peter.Crozier@Wiltshire.gov.uk](mailto:Peter.Crozier@Wiltshire.gov.uk)

26 April 2023

Dear Peter,

**APPLICATION NO:** PL/2023/00249

**DESCRIPTION:** Change of use of land to private family Traveller site and associated development

**LOCATION:** Land North of M4 Motorway, Littleton Drew, Chippenham, Wiltshire, SN14 7LZ

The above planning application, which is for a development that would be located within the Cotswolds National Landscape<sup>1</sup>, has been brought to the attention of the Cotswolds National Landscape Board<sup>2</sup> ('the Board').

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) 11 Dip-Slope Lowland;
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)) particularly, in this instance, with regards to LCT 11 ([link](#)), including Section 11.2;
- Cotswolds AONB Local Distinctiveness and Landscape Change ([link](#));
- Cotswolds Conservation Board Position Statements ([link](#)) particularly, in this instance, with regards to Dark Skies and Artificial Light ([link](#)) and its appendices ([link 1](#), [link 2](#), [link 3](#)).

Having reviewed the application and for the reasons outlined below in Annex 1, the Board **does not object** to this application, subject to the imposition of appropriate and enforceable conditions relating to hard and soft landscaping, lighting and trees, should, without prejudice, the Council be minded to grant planning permission. We would recommend that all conditions should be closely monitored to ensure compliance, in the interests of the conservation and enhancement of the landscape and scenic beauty of the Cotswolds National Landscape.

The Board also notes the concerns of local community over the retrospective nature of the application and the Council's comments regarding intentional unauthorised development in the Officer's report for the previous application for a similar development on this site (ref. PL/2022/03561). Therefore, the Board requests that the Council satisfies itself that this application is supported by sufficient detail to address all matters raised in the Officer's report for the previous refusal.

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

Chairman:  
**Brendan McCarthy**  
  
Vice Chair:  
**Rebecca Charley**

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

Yours sincerely,

A handwritten signature in black ink, appearing to be '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 BOARD CONSULTATION RESPONSE IN RELATION TO PLANNING APPLICATION PL/2023/00249

Having reviewed the application and its supporting information, it appears to be largely similar to the proposal refused by the Council in October 2022 (ref. PL/2022/03561), albeit with the addition of ecology and noise assessments to address some of the Council's previous reasons for refusal.

### *Landscape and visual impact*

Paragraph 176 of the National Planning Policy Framework requires that *"great weight should be given to conserving and enhancing landscape and scenic beauty in ...Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues"*. This is also reflected in the Wiltshire Core Strategy ('WCS'); paragraph 5.48 outlines how all development within the Chippenham Community Area (within which the site is located) 'will need to conserve the designated landscape of the Cotswolds AONB and where possible enhance its locally distinctive characteristics'. WCS Core Policy 51 also requires that development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures.

No landscape and visual assessment of the site has been provided by the applicant. Notwithstanding this, the Board notes the fact that the site is relatively well screened, particularly from the highway, it lacks proximity to public rights of way and the scale of development proposed is relatively minor, those elements comprising operational development being two dayrooms, hard surfacing and sewage treatment equipment. The Board also notes the Council Landscape Officer's response in assessing the previous (largely similar) application, to which no landscape objection was raised subject to the retention of existing trees and hedgerows as well as additional native planting to be agreed through a submission of a soft and hard landscaping scheme secured via planning condition.

Bearing in mind the above, on balance, the Board does not consider that the proposal would conflict with WCS Core Policy 51 subject to additional native planting being provided for via a soft and hard landscaping scheme to be secured via planning condition should, without prejudice, the Council be minded to grant planning permission.

### *Lighting and dark skies*

The applicant has also provided no information as to whether or not any external lighting is proposed. Dark skies are one of the 'special qualities' of the National Landscape and Policy CE5 of the Cotswolds AONB Management Plan 2023-2025 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 11.2 of the Cotswolds AONB Landscape Strategy and Guidelines for LCT 11 highlights the 'introduction of 'lit' elements to characteristically dark landscapes' as a potential (adverse) implication for isolated development such as this.

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.

As such, the introduction of any lit elements should be designed to adhere to this guidance. 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. 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 Council is minded to grant planning permission, we would request that details of external lighting are required to be submitted via a suitably-worded planning condition in the interest of preserving the landscape character and dark skies of the Cotswolds National Landscape.

#### *Other matters*

The Board also notes and supports the response of the Council's Arboricultural Officer dated 11 April 2023 regarding a lack of arboricultural information supplied and the conditioning of an Arboricultural Method Statement if construction is proposed within the root protection area of trees.

Finally, the Board notes the concerns of local community over the retrospective nature of the application and also the Council's comments regarding intentional unauthorised development in the Officer's report for application ref. PL/2022/03561. Therefore, the Board requests that the Council satisfies itself that this application is supported by sufficient detail to address all matters raised in the Officer's report for the previous application.

## 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)