



Isobella Wise  
Stroud District Council  
Ebley Mill  
Ebley Wharf  
Stroud  
GL5 4UB

By email only to: [Isobella.wise@stroud.gov.uk](mailto:Isobella.wise@stroud.gov.uk);

22 June 2023

Dear Isobella,

**APPLICATION NO:** S.23/1126/AFPA

**DESCRIPTION:** Erection of agricultural storage barn

**LOCATION:** Land at Alderley Road, Hillesley, Gloucestershire

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, with regards to Landscape Character Type (LCT) 19 Unwooded Vale, where the site is located, and LCT 3 Rolling Hills and Valleys, from which the site is visible;
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)) particularly, in this instance, with regards to LCT 19 ([link](#)) including Section 19.9 and LCT 3 ([link](#)) including Section 3.10;
- Cotswolds AONB Local Distinctiveness and Landscape Change ([link](#));
- Cotswolds Conservation Board Position Statements ([link](#)), particularly, in this instance, with regards to the Dark Skies and Artificial Light Position Statement ([link](#)) and its appendices ([link 1](#), [link 2](#), [link 3](#)).

For the reasons outlined in Annex 1 below, we **object** to this application as it has not demonstrated that the siting, design and external appearance of the proposed barn would conserve and enhance the natural beauty of the Cotswolds National Landscape and as such would not accord with Section 85 of the Countryside and Rights of Way Act 2000, paragraphs 176 and 185c of the National Planning Policy Framework and Delivery Policy ES7 of the Stroud District Local Plan 2015. Therefore, the Board considers that this application for prior approval should be refused.

We also note the comments of Alderley Parish Meeting in respect of whether the holding benefits from GPDO rights and recommend that the Local Planning Authority satisfies itself as to whether or not the operations on the site satisfy the requirements of the GPDO.

#### **Cotswolds Conservation Board**

Cotswold Business Centre  
2 A P Ellis Road, Upper Rissington  
Cheltenham, Gloucestershire GL54 2QB  
07841 663607  
[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**

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 read 'S. Joyce', with a stylized flourish at the end.

Simon Joyce MRTPI

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 S.23/1136/AFPA**

The applicant submitted an application for prior approval (appn. ref. S.22/1739/AFPA) under Schedule 2, Part 6 of The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) for the erection of a barn. In refusing the prior approval application on 3 August 2022, the LPA considered that it has not been demonstrated that there is a justifiable sustainable farming agricultural need for a building of the notified scale and design to be sited in the proposed location. The location and scale of the proposed building would not be sympathetic to, or complementary of, this part of the Cotswolds Area of Outstanding Natural Beauty and the erection of the building notified would result in an unduly prominent and visually harmful permanent addition to an otherwise undeveloped parcel of land.

Although this proposal has been amended in an attempt to overcome the previous refusal, the Board's concerns remain in relation to the siting of the proposed development and its potential detrimental impact on the natural beauty of the Cotswolds National Landscape.

### **Landscape and Visual Impact**

The site is located within the Cotswolds National Landscape, within which there is a duty to have regard to the purpose of conserving and enhancing natural beauty. Within this context paragraph 176 of the National Planning Policy Framework further states that great weight should be given to conserving and enhancing landscape and scenic beauty. These objectives are reflected in Delivery Policy ES7 of the Stroud District Local Plan 2015 which 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.

Delivery Policy ES7 also states that in all locations, development proposals should conserve or enhance the special features and diversity of the different landscape character types found within the District and priority will be given to the protection of the quality and diversity of the landscape character. 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's 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). Proposals that are likely to impact on, or create change in, the landscape of the Cotswolds AONB should have regard to the scenic quality of the location and its setting and ensure that views and visual amenity are conserved and enhanced.

In landscape character terms, the application site lies within the Unwooded Vale Landscape Character Type, as identified within the Cotswolds AONB LCA. This Landscape Character Type is described within the Cotswolds AONB LS&G as being *"highly sensitive to change, particularly in agricultural areas not currently associated with development"*. The LS&G also notes that vale landscapes with wide vantage points *"are particularly sensitive to the effects of large scale built development such as agricultural sheds and light industrial units as these are difficult to screen from elevated vantage points. These*

*landscapes are also highly sensitive to development that may disturb the strong field patterns created by hedgerows as these are best perceived from higher ground”.*

Section 19.9 of the LS&G for the Unwooded Vale Landscape Character Type identifies the *“Construction of large scale ‘industrial style’ agricultural sheds on the skyline or in prominent locations”* as a potential adverse landscape implication of proposals such as this. It recommends that new large scale farm buildings do not have an adverse visual impact on the wider landscape including on views from and to the neighbouring LCTs. In this case, the boundary with LCT3, Rolling Hills and Valleys, lies a short distance to the north of the site and despite the revised position proposed in this application, it is likely that the barn would remain clearly visible from the neighbouring LCT, in particular when viewed from the Cotswold Way National Trail.

In visual terms, whilst it has been positioned closer to the trees and hedgerow at the northern boundary of the field, the proposed barn will introduce a substantial structure (in excess of 125m<sup>2</sup> and almost 4.5m high at the ridge) into what is currently an undeveloped agricultural field. It is likely that the barn would appear as a prominent new addition in elevated views from the Cotswold Way National Trail running along the opposite side of the Kilcot Valley to the north between the Foxholes Turn and Alderley village, a distance of more than 1km. This includes a stretch of c.200m where views of the valley and the site are uninterrupted on a nationally-promoted route where users would be of very high sensitivity to change.

On the basis of the above, we consider that the siting, design and external appearance of the barn does not accord with the guidance contained within the LS&G and, by extension, policy CE1 of the AONB Management Plan. It also does not comply with Policy ES7 of the Stroud Local Plan.

## LIGHTING

The applicant has also not provided details of any external lighting that would be associated with the proposed development though it is reasonable to assume that the barn would be used outside of daylight hours.

In line with Policy CE5 (Dark Skies) of the Cotswolds AONB Management Plan, lighting should be avoided if possible. If it cannot be avoided, it should be minimised. Any lighting associated with the development should be consistent with the Board’s Position Statement on Dark Skies and Artificial Light, referenced above.

Any lighting would introduce a ‘lit element’ into what would otherwise be a relatively dark night-time landscape with these dark skies being one of the ‘special qualities’ of the Cotswolds National Landscape.

Paragraph 185c of the National Planning Policy Framework (‘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.

Accordingly, further information, particularly on any external lighting (relevant to the design and external appearance of the building), is required to demonstrate adherence to this guidance and, by

extension, with the policies of the Cotswolds AONB Management Plan in particular Policy CE5 (Dark Skies) as well as the ILP Guidance Note for Reduction of Obtrusive Light (updated in 2021) and the CfDS Good Lighting Guide which form Appendices B and C of the Board's Dark Skies & Artificial Light Position Statement (linked above).

## 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 2023-2025  
[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)