



Ceri Porter
Stroud District Council
Ebley Mill
Ebley Wharf
Stroud
Gloucestershire
GL5 4UB

By email only to: ceri.porter@stroud.gov.uk

20 March 2023

Dear Ceri,

APPLICATION NO: S.23/0395/FUL

DESCRIPTION: A single-storey eco-lodge

LOCATION: Beechwood Farm, Windsoredge Lane, Nailsworth, Gloucestershire, GL6 0NP

Thank you for consulting the Cotswolds National Landscape Board¹ on this proposed development, which would be located within the Cotswolds National Landscape².

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.³ 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 publications⁴:

- 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) 5 (Settled Valleys);
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)) particularly, in this instance, with regards to LCT 5 ([link](#)) including Section 5.2;
- 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 Tranquillity Position Statement ([link](#)) and 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, whilst the Board **does not object** to this application, should, without prejudice, the LPA be minded to grant planning permission, we recommend that appropriately worded planning conditions are imposed to control external lighting, light spill and occupancy in the interests of the conservation and enhancement of the natural beauty of the Cotswolds National Landscape and ensure compliance with Stroud Local Plan Delivery Policy ES7.

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

Chairman:
Brendan McCarthy

Vice Chair:
Rebecca Charley

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 rectangular background.

Simon Joyce

Planning Officer

simon.joyce@cotswoldsaonb.org.uk | 07808 391227

ANNEX 1 COTSWOLDS NATIONAL LANDSCAPE CONSULTATION RESPONSE IN RELATION TO PLANNING APPLICATION S.23/0395/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 and complements the statutory duty to have regard to the purpose of conserving and enhancing the natural beauty of the National Landscape in considering this application.

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.

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'). There should be a presumption against the loss of key characteristics identified in the LCA.

The Board also supports sustainable tourism proposals subject to them being compatible with the conservation and enhancement of the National Landscape's natural beauty. Management Plan Policy UE3 recommends that tourism within the Cotswolds National Landscape is delivered and managed in a way that minimises adverse effects on the natural beauty of the National Landscape and the emission of greenhouse gases. Visitors should be provided with a variety of accommodation options over a range of prices. The siting and design of visitor accommodation should be compatible with conserving and enhancing the natural beauty of the National Landscape including its special qualities.

Section 5.2 of the LS&G identifies '*visual intrusions introduced to the landscape*', the '*introduction of lit elements to characteristically dark valley slopes*' and '*potential for glint from buildings*' as potential adverse implications of isolated development such as this. The guidelines seek to '*conserve dark stretches of the valleys and valley slopes forming the backdrop to settlements*', with these dark skies being one of the 'special qualities' of the Cotswolds National Landscape.

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.

Management Plan Policy CE5 states that proposals that are likely to impact on the dark skies of the Cotswolds National Landscape should have regard to these dark skies, by seeking to avoid and where avoiding is not possible, minimise light pollution.

Having reviewed the applicant's Design and Access Statement which includes a Landscape and Visual Appraisal, we consider that the applicant has demonstrated the siting of the lodge in a clearing formed by a quarry within woodland would not adversely impact the local landscape character or views to and from the site.

We do have comments regarding lighting as any lighting in this location would introduce a 'lit element' into what would otherwise be a relatively dark night-time landscape. The Design and Access Statement states that *"exterior lighting is to be subdued to limit light pollution and retain evening views of the night sky. Lighting will be low-level battery LED lighting to guide access to the Lodge entrance door and illuminate the deck terrace"* however no plans or specifications for the lighting have been provided.

Without prejudice, if the local authority is minded to grant planning permission, we would recommend that in order to ensure compliance with Management Plan Policy CE5 and by extension, Local Plan Delivery Policy ES7, pre-commencement conditions are imposed in the interest of preserving the landscape character and dark skies of the Cotswolds National Landscape. We recommend that such a condition would require the applicant to 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.

We also note the plans show full length glazing looking out across the valley. Although this clearly has been designed to maximise the expansive views for occupants, the potential for light spill and glow from this elevation is a potential concern. 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 comprise best practice for protected landscapes in relation to this issue, advises that large (>50% on a single elevation) single areas of glazing should be avoided in protected landscapes. Therefore, we recommend that louvres (or similar) should be installed in the large full-length glazed windows to reduce light spill.

We also recommend the imposition of an appropriate condition to ensure that the lodge can only be used for short stay tourism purposes.

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
- 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
 - 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