

Rachel Brown
Stroud District Council
Ebley Mill
Ebley Wharf
Stroud
GL5 4UB



By email only to: rachel.brown@stroud.gov.uk

22 June 2023

Dear Rachel,

APPLICATION NO: S.23/1136/FUL

DESCRIPTION: Replacement agricultural workers dwelling

LOCATION: Bradley Barn Farm, Old London Road, Wotton-Under-Edge, Gloucestershire, GL12 7PT

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

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) 7 High Wold where the site is located and 3 (Rolling Hills and Valleys) from which the site is potentially visible;
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)) particularly, in this instance, with regards to LCT 7 ([link](#)) including Section 7.2 and LCT 3 ([link](#)) including Section 3.2;
- Cotswolds AONB Local Distinctiveness and Landscape Change ([link](#));
- Cotswolds Conservation Board Position Statements ([link](#)), particularly, in this instance, with regards to Housing ([link](#)), Landscape-Led Development ([link](#)) and Dark Skies and Artificial Light Position Statement ([link](#)) and its appendices ([link 1](#), [link 2](#), [link 3](#)).

Having reviewed the accompanying plans and documents, we **do not object** to this application. However, without prejudice, if the local authority is minded to grant planning permission, we request that planning conditions should be imposed regarding lighting to control any impact on the dark skies of the National Landscape. We provide further comment in Annex 1 below.

Cotswolds Conservation Board

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

Chairman:
Brendan McCarthy

Vice Chair:
Rebecca Charley

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

Simon Joyce MRTPI

Planning Officer

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

ANNEX 1 COTSWOLDS NATIONAL LANDSCAPE CONSULTATION RESPONSE IN RELATION TO PLANNING APPLICATION S.23/1136/FUL

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.

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 and Landscape Strategy and Guidelines. 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.

With regards to potential impacts on landscape character the proposed development is located in the 'High Wold' Landscape Character Type, LCT 7 in the Cotswolds AONB Landscape Character Assessment referred to above. Section 7.2 of the Cotswolds AONB Landscape Strategy and Guidelines lists 'visual intrusions introduced to the landscape' as a potential adverse landscape implications of isolated development such as this proposal.

Whilst the dwelling is larger than that it would replace, we agree with the applicant that the current dwelling is small and consider the proposed replacement is of a reasonable size, scale and form for an agricultural worker and their family, in line with the requirements of Stroud Local Plan Delivery Policy HC5 and CP15. The site is well screened from the Old London Road and the Public Right of Way which runs along its eastern boundary. As such the relocation of the dwelling within the garden is also unlikely to give rise to significant adverse impacts on the landscape and scenic beauty of the National Landscape and would provide some benefits in locating the dwelling slightly further away from the other farm buildings.

Lighting and dark skies

The applicant has not provided details of any internal or external lighting that would be associated with the proposed development, both on the house itself and on/around the car parking areas and communal areas. 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 additional lighting could potentially 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 and this being highlighted as a potential adverse landscape implication in Section 7.2 of the LS&G referred to above.

Paragraph 185c of the National Planning Policy Framework 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.

Without prejudice, if the local authority is minded to grant planning permission, planning conditions should be imposed to ensure compliance with the requirements of with Guidance Note 01/21 on The Reduction of Obtrusive Light, published by the Institution of Lighting Professionals (ILP) (which forms Appendix 2 of the Board's Position Statement on Dark Skies and Artificial Light, referenced above). We would recommend that the relevant 'environmental zone' for which compliance should be assessed is Environmental Zone E1 which relates to AONBs to mitigate any adverse impact and ensure that all lighting meets the standards to preserve the dark skies and landscape character of the Cotswolds National Landscape.

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 2023-2025
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