



Denis Canney
Senior Planning Officer
Strategic Infrastructure
Gloucestershire County Council
Shire Hall
Gloucester
GL1 2TH

By email only to: planningdc@gloucestershire.gov.uk

29 November 2021

Dear Denis,

APPLICATION NO: 21/0075/STMAJW

DESCRIPTION: Installation of a Combined Sewer Overflow (CSO) and associated outfall south of the A419, Ebley Bypass

LOCATION: Land South of A419, Ebley Bypass, Stroud

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

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.² 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:

- Cotswolds Area of Outstanding Natural Beauty (AONB) Management Plan 2018-2023 ([link](#));
- Cotswolds AONB Landscape Character Assessment ([link](#)) particularly, in this instance, with regards to Landscape Character Type (LCT) 18 Settled Unwooded Vale and LCT 2 Escarpment;
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)) particularly, in this instance, with regards to LCT 18 ([link](#)) and LCT 2 ([link](#)).
- Cotswolds AONB Local Distinctiveness and Landscape Change ([link](#));
- Cotswolds Conservation Board Position Statements ([link](#)) particularly, in this instance, with regards to the Tranquillity Position Statement ([link](#)) and with regards to the Dark Skies and Artificial Light Position Statement ([link](#)) and its appendices ([link 1](#), [link 2](#), [link 3](#)).

The Board would have preferred to see the development located outside of the AONB, however it acknowledges that this type of development must necessarily be located in proximity to the communities it serves, the applicant has considered a number of other locations which were discounted due to engineering and environmental constraints and the Council is satisfied that alternative locations were considered and discounted in line with the requirements of Gloucestershire Waste Core Strategy Policy WCS14.

Whilst the Board does not object to the proposal, it would like to briefly comment upon visual impact and lighting matters.

Cotswolds Conservation Board

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

Visual impact

The Cotswolds AONB Landscape Strategy & Guidelines for LCT 18 (Section 18.1) identifies the 'loss of landscapes that contribute to the setting of towns and villages' and 'degradation of views from and to the Cotswold Scarp' as potential (adverse) implications for development such as this.

The development itself comprises a CSO including a new access, kiosk, transformer, swing jibs and other infrastructure. Much of the new development appears to be located below ground level whilst the structures above ground have been designed to minimise their impact upon the protected landscape.

We agree with the LVIA that the tree belts along the A419 corridor provide some screening into the Site and there is likely to be no direct view into the site from the Public Right of Way to the north of the A419. Short-range views of the site from the Public Right of Ways to the west and east of the site and south of the A419 are likely to be largely restricted by intervening hedgerows.

The most sensitive viewpoint is from the south at Selsley Common which offers panoramic views across the low-lying river valley. However, the LVIA demonstrates that the site's topography and the fact that the site will be cut into the existing slope along with the proposed planting of a native mixed field hedge and stock proof fencing around the site's southern boundary. This will provide some degree of screening in the long views of the valley from the elevated and open areas at Selsley Common.

Taking into account the distance, height, the site's context of the background of the A419, Ebley and other settlements on the northern banks of the Frome Valley and the mitigation measures proposed, it is considered that the impact on views from Selsley Common would be relatively low.

Overall, the Board agrees with the conclusion of the LVIA that the CSO and its associated infrastructure would have a minor negative impact on the AONB. However subject to the landscape mitigation measures being put in place, the impact on views from Selsley Common will be slight and this negative slight adverse impact is likely to be outweighed by the public benefits of the proposal.

Lighting

The Cotswolds AONB Landscape Strategy & Guidelines for LCT 18 (Section 18.5) identifies 'the introduction of lit elements to characteristically dark landscapes' as a potential (adverse) implication for development such as this that impacts long views and panoramas. The guidelines seek to 'conserve areas of dark skies', with these dark skies being one of the 'special qualities' of the Cotswolds National Landscape.

As such, the introduction of any lit elements should be designed to adhere 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 and the CfDS Good Lighting Guide which form Appendices B and C of the Board's Dark Skies & Artificial Light Position Statement (linked above).

The applicant has submitted a Proposed Lighting Plan (Dwg. No. 612048-NMC-XX-06-DR-C-0041) which proposes lighting located on the kiosk and swing jib. The 3D rendered nighttime views illustrate that this lighting is focussed downwards and with light distribution radii of 2.5-3m, should be relatively unintrusive in the wider views of the site.

Conclusion

Without prejudice, if the local authority is minded to grant planning permission, we recommend that planning conditions should be imposed which seek to mitigate any adverse impact and ensure that lighting and landscape mitigation and enhancement measures as shown on the submitted plans are secured.

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

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S. Joyce', with a small dot at the end.

Simon Joyce MRTPI

Planning Officer

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

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) Section 85 of the Countryside and Rights of Way Act 2000.
www.legislation.gov.uk/ukpga/2000/37/section/85
- 3) 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