



Dawn Lloyd
Development Services
Tewkesbury Borough Council
Gloucester Road
Tewkesbury
Gloucestershire
GL20 5TT

By email only to: dawn.lloyd@teiwkesbury.gov.uk

14 June 2022

Dear Dawn,

APPLICATION NO: 22/00283/FUL

DESCRIPTION: Construction of an agricultural building

LOCATION: The Glass Houses, Whitelands Lane, Little Shurdington

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 Types (LCTs) 18 Settled Unwooded Vale in which the site is located and 2 Escarpment and 7 High Wold, from which the site is potentially visible;
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)) particularly, in this instance, with regards to LCT 18 ([link](#)), including Sections 18.2 and 18.9, LCT 2 ([link](#)) including Section 2.1 and LCT 7 ([link](#)) including Section 7.1;
- 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 Position Statement ([link](#)) and its appendices ([link 1](#), [link 2](#) now updated in 2021, [link 3](#)).

Whilst the Board **does not wish to object** to this application, we have commented upon issues relating to landscape and visual impacts, lighting and operational need in Annex 1 below.

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

I hope this response assists but please don't hesitate to contact me if you wish to discuss further.

Yours sincerely,

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

Simon Joyce

Planning Officer

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ANNEX 1: RESPONSE OF COTSWOLDS NATIONAL LANDSCAPE TO APPLICATION NO. 22/00283/FUL, 14 JUNE 2022

Policy AGR1 of the Tewkesbury Borough Plan 2011-2031, adopted by the Council on 8 June 2022 states that proposals for new agricultural development, including intensive and industrial scale agricultural operations, to meet the needs of the agricultural business will be permitted, provided that, where appropriate, *inter alia*:

- The proposed development is sympathetically designed in terms of height, mass, materials, colour and landscaping where appropriate;
- the proposed development is reasonably necessary and designed for the purposes of agriculture; and
- the proposal development is well sited in relation to existing buildings, access tracks, ancillary structures and works, and landscape features in order to minimise adverse impact on the visual amenity of the rural landscape paying particular regard to Areas of Outstanding Natural Beauty.

In respect of the first bullet point above, the applicant seeks permission to erect a new agricultural building for storage, preparation and propagation purposes associated with the horticultural nursery business on site. The proposed building has a footprint of 42m by 18.7m and will be 6m to the eaves and 8.8m to the ridge. The applicant states that it is likely to be finished in green profile steel cladding sheets which could be secured by an appropriately worded pre-commencement condition to allow further consideration of materials, colour and the potential for reducing reflective glint and glare in the interests of minimising its visual impact.

As far as the second criterion above is concerned, we would advise that the Council should satisfy itself of the operational need for this building. Whilst the covering letter states that it has been designed so that it can accommodate the range of activities that the client needs to carry out under the cover of a building, no further justification or evidence relating to the need for it has been provided.

Turning to the third bullet point above, Policy SD7 of the Joint Core Strategy requires that all development proposal within the setting of the Cotswold AONB will be required to conserve and, where appropriate, enhance its landscape, scenic beauty, wildlife, cultural heritage and other special qualities. Proposals will also be required to be consistent with the policies set out in the Cotswold AONB Management Plan 2018-2023. Policy CE1 of the 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.

The Cotswolds AONB Landscape Strategy and Guidelines ('LS&G') for the Landscape Character Type within which the site is situated, the Unwooded Vale, describes how *"even in rural areas the screening effects of landform, farm woodlands, hedgerows and shelterbelts provide a framework in which some opportunities for small-scale development exist"*. Section 18.9 of the LS&G also advises that *"new large scale farm buildings ...[should]... not have an adverse visual impact on the wider landscape*

including on views to and from the Settled Unwooded Vale, and views from and to the neighbouring LCTs". This is significant given that views from the Cotswold escarpment (LCT 2) and the High Wold (LCT 7) are both 'special qualities' of the Cotswolds National Landscape as well as being 'key features' of these LCTs.

It is disappointing that the applicant has provided no analysis of the potential landscape and visual impact of the building, particularly given its location within the AONB and at the foot of the escarpment. However, following our assessment of the proposal, in our view it is unlikely to have a significant adverse impact. The site itself is relatively well screened from nearby roads and Public Rights of Way, including Badgeworth footpath 50 which runs along the eastern boundary of the site. In longer range views and in particular those from viewpoints from the escarpment, it would be experienced in the context of the adjacent glasshouses and the neighbouring Shurdington Nurseries to the east. There are a number of horticultural nurseries and garden centres in the local area and the addition of such a building, which will be partially screened from view, is unlikely to appear incongruous in this setting.

We note that no details regarding external lighting have been provided. Any lighting in this location would introduce a 'lit element' into what would otherwise be a relatively dark night-time landscape and these dark skies are one of the 'special qualities' of the Cotswolds National Landscape. The Cotswolds AONB Landscape Strategy & Guidelines for LCT 2 (Section 2.2) identifies 'the introduction of lit elements to characteristically dark landscapes' as a potential (adverse) implication for isolated development such as this. Policy CE5 (Dark Skies) of the AONB Management Plan advises that proposals that are likely to impact on the dark skies of the Cotswolds AONB should have regard to these dark skies, by seeking to (i) avoid and (ii) minimise light pollution.

The Board's Dark Skies and Artificial Light Position Statement and its appendices (referenced above) provides further guidance on this matter and we would request that should lighting be proposed, any lighting scheme should be subject to a pre-commencement condition to protect the ecological value of the site as well as the requirement to avoid and minimise light pollution in the AONB.

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