



Joan Desmond
Planning and Strategic Housing
West Oxfordshire District Council
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Witney
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By email only to: joan.desmond@westoxon.gov.uk

31 March 2022

Dear Joan,

APPLICATION NO: 22/00613/FUL

DESCRIPTION: Extension to existing parking area to formalise temporary parking and provision of new access arrangements. Form new storage compound and associated landscaping.

LOCATION: Diddly Squat Farm Shop, Chipping Norton Road, Chadlington, Oxfordshire

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) 9 (High Wold Dip Slope), which the site is located within, and LCT 7 (High Wold) and LCT 16 (Broad Floodplain Valley) from which the site could potentially be seen;
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)) particularly, in this instance, with regards to LCT 9 ([link](#)), including Section 9.2, 9.14 and 9.15, and LCT7 ([link](#)) and LCT16 ([link](#));
- Cotswolds AONB Local Distinctiveness and Landscape Change ([link](#));
- Cotswolds Conservation Board Position Statements ([link](#)) particularly, in this instance, with regards to
 - Tranquillity Position Statement ([link](#)) particularly sections 4.5 Traffic and Vehicle Movements, 4.6 Visitor Numbers and 5.1 Parking; and
 - Dark Skies and Artificial Light Position Statement ([link](#)) and its appendices ([link 1](#), [link 2](#), [link 3](#)).

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

Traffic

The traffic congestion and inappropriate parking, in particular on Chipping Norton Road that has occurred during the opening hours of the Diddly Squat farm shop has been well publicised. This level of traffic is not appropriate in an Area of Outstanding Natural Beauty such as the Cotswolds National Landscape, especially given that one of the 'special qualities' of the area is its relative tranquillity (as outlined in the Board's Tranquillity Position Statement, referred to above).

We acknowledge that the formalisation of the temporary car park may go some way to improving inappropriate parking on Chipping Norton Road and other roads in the local area and the proposed amendments to access arrangements should improve traffic flow around the site and safe access and egress. The Board also notes the response of Oxfordshire County Council, the Local Highways Authority, dated 23 March 2022, in which the County Council considers that the proposal would not have a significant detrimental impact on the adjacent highway network in terms of highway safety.

Without prejudice, should the LPA be minded to grant planning permission for this application, we would support the County Council's recommendation that the applicant work with the County Council to implement a 'no waiting' order along the length of the road adjacent to the site.

Lighting

Whilst the current application currently contains no additional lighting proposals, we note the consultation response of Thames Valley Police's Crime Prevention Design Advisor, dated 10 March 2022, whereby he requests that the car park and access routes are lit, along with entrance and exit points to buildings, should the development be in use outside of daylight hours.

The Board would not support the provision of intrusive lighting in this location as it would introduce a 'lit element' into what would otherwise be a relatively dark night-time landscape. The Cotswolds AONB Landscape Strategy & Guidelines for LCT 9 (Section 9.2) identifies 'the introduction of lit elements to characteristically dark landscapes' as a potential (adverse) implication for isolated development such as this. The guidelines seek to 'conserve areas of dark skies', with these dark skies being one of the 'special qualities' of the Cotswolds National Landscape. This is particularly important in an area with relatively low levels of light pollution such as this (as indicated in Appendix 1 of the Board's Tranquillity Position Statement, referred to above).

As such, the introduction of visually intrusive lit elements would not be compatible with this guidance or, by extension, with the policies of the Cotswolds AONB Management Plan, for example, Policies CE5 (Dark Skies) and CE10 (Development & Transport – Principles) as well as Policies EH2 and EH8 of the West Oxfordshire Local Plan 2031.

Bearing the above in mind, we note Section 5.2 of the applicant's LVIA Addendum states that *"Consideration has been given to the need for lighting and due cognisance has been given to the potential impact on the characteristically dark skies of the Cotswolds AONB. No additional external lighting is proposed for the new access and car park areas"*.

The applicant then states that the Farm Shop opening hours limit the use of the site after dark. They also state that Farm Shop is currently open Wednesday to Sunday 9.30am to 4.30pm and is closed Monday and Tuesday and during the winter months of January and February and the car park will also be gated to allow its use to be restricted to opening hours. However, the LVIA then proceeds to somewhat contradict this position by stating later in Section 5.2 that *"the use of 1.8m high willow hurdles proposed around the southern and western boundaries of the car park to immediately screen*

the movement of vehicles during the day and the beams of car headlights at night, until the native hedgerow boundary has matured” (our emphasis).

Without prejudice, if the LPA is minded to grant planning permission, we recommend that the LPA requests further clarification from the applicant on this matter and gives due consideration to whether additional planning conditions should be imposed in respect of operational hours to limit the use of the site to daylight hours and avoid the need for external lighting.

The Board would also recommend regular monitoring of the development to ensure compliance with all approved plans and conditions.

Wildflower Planting

Although the wildflower mix proposed does contain some calcareous grassland species, it is not a ‘typical’ calcareous mix and contains crimson clover, not a native species. We would suggest a preferable seed mix would be Emorsgate EM6 Meadow Mixture for Chalk and Limestone Soils (<https://wildseed.co.uk/mixtures/view/7>).

If you have any queries regarding this response, please do not hesitate to get in touch.

Yours sincerely,

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

Simon Joyce

Planning Officer

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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