

Roger Hemming
South Gloucestershire Council
Department for Environment and Community Services
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By email only to: roger.hemming@southglos.gov.uk

19 April 2022

Dear Roger,

APPLICATION NO: P22/01430/F

DESCRIPTION: Erection of 74 seat viewing stand. Installation of 6no. floodlight columns and erection of 6m high fencing to north of site, with associated works (resubmission of P22/00270/F).

LOCATION: Wick Sports Ground, Oldbury Lane, Wick, South Gloucestershire, BS30 5RJ

Thank you for consulting the Cotswolds Conservation Board ('the Board') on this proposed development, which would be located within the Cotswolds National Landscape¹.

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) 19 Unwooded Vale within which the site is located and LCT 2 (Escarpment) from which the site could potentially be visible;
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)) particularly, in this instance, with regards to LCT 19 ([link](#)) including Sections 19.1 and 19.5 and LCT 2 ([link](#)) including Sections 2.1 and 2.5;
- 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](#)); and
 - Tranquillity Position Statement ([link](#)).

This application is a resubmission of a previously withdrawn scheme (appn. ref. P22/00270/F) and seeks permission for a 74-seat viewing stand, 6x15m high floodlights and a 6m high ball stopping net.

Lighting and Dark Skies

Paragraph 176 of the NPPF 2021 requires great weight to be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty whilst Policy CS9 of the South Gloucestershire Core Strategy states that new development will be expected to, inter alia, conserve

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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

and enhance the character, quality, distinctiveness and amenity of the landscape. Its supporting text states that proposals for development within the AONB should take account of the objectives of the Cotswolds AONB Management Plan and seek to conserve and enhance the unique character, tranquillity and special qualities of the Cotswolds landscape. The dark skies of the National Landscape are one of the area's aforementioned 'special qualities'.

The Board's AONB Management Plan and guidance documents are material considerations in decisions relevant to the AONB. Policy CE5 'Dark Skies' of the AONB Management Plan 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 (i) avoid and (ii) minimise light pollution. Measures should be taken to increase the area of dark skies in the Cotswolds AONB by (i) removing and (ii) reducing existing sources of light pollution.

Section 19.5 of the Cotswolds AONB Landscape Strategy and Guidelines for LCT 19 referred to above identifies the introduction of lit elements into characteristically dark landscapes as a potential adverse landscape implication. Notwithstanding the floodlights currently present around the adjacent all-weather court, the introduction of 6 x 15m high floodlights would expand the floodlit area in what is a mainly dark rural landscape and may not be consistent with the Landscape Strategy and Guidelines and, by extension, the policies of the Cotswolds AONB Management Plan 2018-2023.

The applicant's Lighting Assessment does not consider the impact of the proposal on the National Landscape. Therefore, and in line with the request of the Council's Landscape Architect, we would request further information on the potential impact of the floodlighting on the wider National Landscape in terms of views from adjacent visual receptors, including the adjacent public right of way and more distant overlooking higher land.

Landscape and Visual Impact

The applicant has provided limited information relating to the potential combined landscape and visual impact of the proposed stand, floodlights and netting. The steel stand, though undoubtedly functional, might not appear as sympathetic to the character of the National Landscape. In line with the comments made by the Council's Landscape Architect, we would also welcome further information and sections illustrating mitigative planting which may help screen the proposal in local and longer-range views.

We also note the comments of the Council's Ecologist and Sport England in respect of further information being required.

In conclusion, we wish to raise a **holding objection** to this application in its current form as it fails to demonstrate compliance with Core Strategy Policy CS9 and request that the applicant seeks to address the issues raised above as well as those raised by other consultees in their responses.

Please don't hesitate to contact me if you would wish to discuss this response.

Yours sincerely,



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