



Victoria Davis
Wiltshire Council
Bythesea Road
Trowbridge
Wiltshire
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By email only to: Victoria.Davis@Wiltshire.gov.uk

7 March 2022

Dear Victoria,

APPLICATION NO: PL/2021/07966

DESCRIPTION: Change of use of land and buildings to accommodate events uses, installation of 10 camping pods and a tree house as accommodation ancillary to the events business; associated landscaping and engineering works - Part Retrospective.

LOCATION: Euridge Manor Farm, Euridge, Colerne, SN14 8BJ

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 publications³:

- 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 (LCT) 9 High Wold Dip-Slope where the site is located and 12 Dip-Slope Lowland Valley and 4 Enclosed Limestone Valley from where the site is visible;
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)) particularly, in this instance, with regards to LCT 9 ([link](#)) including Sections 9.2 and 9.14, LCT 12 ([link](#)) including Sections 12.2 and 12.8, and LCT 4 ([link](#)), including Sections 4.2 and 4.10;
- 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](#)) and Dark Skies and Artificial Light ([link](#)) and its appendices ([link 1](#), [link 2](#), [link 3](#)).

Having considered the applicant's submission, the Board has concerns in respect of the potential impact this application may have upon the tranquillity of the National Landscape and therefore **objects** pending further information and clarification from the applicant on the issues discussed 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

Please do not hesitate to contact me if you would like 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

Planning Officer

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ANNEX 1: COTSWOLDS NATIONAL LANDSCAPE CONSULTATION RESPONSE IN RELATION TO PLANNING APPLICATION PL/2021/07966

We understand that Euridge Manor Farm has diversified, albeit without planning consent, to become a venue for weddings, corporate and private events for exclusive hire for up to 200-300 guests, with 19 existing sleeping spaces within the site buildings. The applicant would also like to be able to offer further accommodation to cater for guests wishing to stay within the grounds either for the events or holidays and as such the application seeks to regularise the events use whilst gain further permission for 10 camping pods and a treehouse as well as new car parking areas.

Paragraphs 174 and 176 of the National Planning Policy Framework provide the highest status of protection for the landscape and scenic beauty of AONBs, including the Cotswolds National Landscape. Paragraph 174 states that planning decisions should both contribute to and enhance the natural environment by protecting and enhancing valued landscapes in a manner commensurate with their statutory status or identified quality in the development plan. Paragraph 176 then outlines the 'great weight' to be given to the conservation and enhancement of the landscape and scenic beauty of AONBs. It is noted that neither paragraph 174 or 176 of the NPPF are considered within the Planning Statement supporting this application.

The Cotswolds AONB Management Plan 2018-2023, which is a material consideration in planning decision making, identifies the tranquillity of the area and its dark skies as being two of the AONB's 'special qualities'. The special qualities of the AONB are those aspects of the area's natural beauty which make the area distinctive and which are valuable, especially at a national level. They are also the key attributes on which the priorities for the AONB's conservation, enhancement and management should be based.

Policy CE1 of the 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.

We recognise that, in part, this application seeks to promote tourism within the Cotswolds National Landscape. As outlined in Policy UE1 of the AONB Management Plan we support sustainable tourism proposals, provided they offer a range of type and priced accommodation options that are compatible with conserving and enhancing the natural beauty of the National Landscape. However, on this occasion for the reasons outlined below we are concerned that the proposals contained within this application would not conserve and enhance the natural beauty of the AONB.

Potential impacts upon tranquillity

As noted above, tranquillity is one of the 'special qualities' of the Cotswolds National Landscape. In other words, it is one of the features of the Cotswolds that makes the area so outstanding that it is in the nation's interest to safeguard it. The Cotswolds National Landscape has relatively high levels of tranquillity, especially when compared with the surrounding urban areas.

The Board's Tranquillity Position Statement referenced above recommends that proposals that have the potential to impact on the tranquillity of the AONB should accord with Policy CE4 of the

Cotswolds AONB Management Plan 2018-2023, give great weight to conserving and enhancing the tranquillity of the AONB and assess potential impacts on tranquillity, particularly with regards to noise, vehicle movements and landscape and visual impacts, which are considered in turn below.

Noise

Policy CE4 of the Cotswolds AONB Management Plan 2018-2023 states that proposals that are likely to impact on the tranquillity of the AONB should have regard to this tranquillity, by seeking to (i) avoid and (ii) minimise noise pollution and other aural and visual disturbance.

The Planning Statement advises that the venue can accommodate wedding functions of typically 100 guests, but on occasion up to 250 guests. We understand that there is history of complaints relating to noise nuisance from the site and that this application has the potential to exacerbate such noise issues.

We note that no Noise Impact Assessment has been provided as part of the submission and there is no reference to noise within the Planning Statement. Therefore, in line with the recommendations of the Council's Public Protection officer, the Board requests that the applicant provides a detailed assessment of the noise impacts of the proposals to allow full consideration of any potential adverse impact upon the tranquillity of the AONB.

Traffic movements and highways impacts

The site is located on Euridge Manor Farm Road, an unclassified section of public highway subject to a speed limit of 60mph and has a number of PROW Footpaths (COLE3, COLE38 and COLE39) and a Bridleway (COLE13) accessing the road around the site. Euridge Manor Farm Road connects to the north with various unclassified sections of public highway allowing access to the surrounding area, the carriageways on these roads are narrow and of a rural nature with limited visibility and passing places, this is evident by the placing of mirrors in some locations where forward visibility is limited. In absence of evidence to the contrary, we consider that the main form of access to the venue is likely to be via private car, despite the applicant's unsubstantiated claim in the Transport Assessment that 60% of guests for weddings and events travel together by taxi, minibus or coach.

Therefore, the Board notes and supports the consultation response of the Council's Highway Development Control officer, in particular in relation to the requirement for further clarification on trip generation and on the provision of passing places on routes to and from the venue, some of which appear to be on private third-party land.

Section 4.5 of the Board's Tranquillity Position Statement outlines how The Institute of Environmental Assessment's 'Guidelines for the Environmental Assessment of Road Traffic' recommends using two 'rules of thumb' for identifying the scale at which increases in traffic movements should be considered in an Environmental Impact Assessment (EIA):

- Rule 1: Where traffic flows will increase by more than 30% (or the number of heavy goods vehicles (HGVs) will increase by more than 30%).
- Rule 2: Any other sensitive areas where traffic flows have increased by 10% or more.

AONBs are specifically identified as 'sensitive areas' in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. As such, Rule 2 should be applied in the Cotswolds AONB and should relate to both traffic flows. On this basis, it can be argued that an increase in traffic flows of more than 10% from a development proposal or in combination with other proposals is likely to be significant and have an adverse impact on the tranquillity of the Cotswolds AONB.

Therefore, we would request that the applicant provide further information to demonstrate that this application would not generate an increase of more than 10% compared to baseline traffic conditions. Baseline data should reflect both the site's agricultural use (i.e. not include any traffic generated by the current event business operating on site which is doing so without planning consent), the current use including the weddings and events and the traffic generated by the proposed uses. The assessment should take into account traffic flows not only on the access lane from Thickwood Lane, but also Thickwood Lane between Thickwood and Slaughterford and roads between Ford (A420) and Thickwood and the A4 and Thickwood which would be used by visitors.

Landscape and Visual Impact

We are also concerned about the potential impact of traffic movements on the landscape and visual character of the area. Section 9.14 of the Cotswolds AONB Landscape Strategy and Guidelines for LCT 9 (referenced above), within which this site is located, references excessive traffic and/or speed on minor local roads and lanes and verge parking and increases in size of vehicles using lanes as a 'local force for change' which can result in adverse landscape implications and have a negative impact on tranquillity and danger for walkers/riders as well as damaging verges and roadside margins. Section 9.2 also highlights the damage to road verges, roadside hedges and walls and the creation of informal passing places as a potential adverse landscape implication of isolated development in the countryside.

We further note and support the comments of the Council's Strategic Landscape Officer that more screening of the temporary car park area is required to aid in reducing the visual impact of parked vehicles in medium to longer distance views as well as additional planting should be provided beyond the car park and pod area to help integrate the area into the wider landscape setting.

Lighting

Dark skies are another of the 'special qualities' of the AONB and Policy CE5 of the Cotswolds AONB Management Plan 2018-2023 states that proposals that are likely to impact on the dark skies of the AONB should have regard to these dark skies, by seeking to (i) avoid and (ii) minimise light pollution. Section 9.2 of the Cotswolds AONB Landscape Strategy and Guidelines for LCT 9 highlights the 'introduction of 'lit' elements to characteristically dark landscapes' as a potential (adverse) implication for isolated development such as this.

No details regarding lighting have been submitted by the applicant. Any lighting would introduce a 'lit element' into what would otherwise be a relatively dark night-time landscape.

Accordingly information, particularly on any external lighting, is required to demonstrate adherence to this guidance and, by extension, with the policies of the Cotswolds AONB Management Plan in particular Policy CE5 (Dark Skies). The applicant is encouraged to refer to the Board's guidance in relation to artificial light and dark skies contained in our Position Statement referred to above.

Marquees

The Board notes there is mention within the applicant's Planning Statement that marquees will be erected, though it is not clear where they would be situated. Since these are a large temporary structure linked to the requirement for overflow parking, the Board would request further detail on where these would be erected, for what length of time and the size and scale, including ridge height.

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