



Nick Gardiner
Stroud District Council
Ebley Mill
Ebley Wharf
Stroud
GL5 4UB

By email only to: nick.gardiner@stroud.gov.uk

14 July 2022

Dear Nick,

APPLICATION NO: S.22/1437/OUT

DESCRIPTION: Outline application (all matters reserved except access) for the construction of up-to 3 self-build/custom build dwellings

LOCATION: Land Adjoining Stamages House, Stamages Lane, Painswick

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) 8 High Wold Valley;
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)) particularly, in this instance, with regards to LCT 8 ([link](#)) including Section 8.1;
- Cotswolds AONB Local Distinctiveness and Landscape Change ([link](#));
- Cotswolds Conservation Board Position Statements ([link](#)), particularly, in this instance, with regards to Housing ([link](#)), Landscape-Led Development ([link](#)), Tranquillity ([link](#)) and Dark Skies and Artificial Light Position Statement ([link](#)) and its appendices ([link 1](#), [link 2 now updated in 2021](#), [link 3](#)).

The Board wishes to raise a **holding objection** as we consider that insufficient information has been submitted to demonstrate that the proposal will conserve and enhance the natural beauty of the Cotswolds National Landscape as required by Section 85 of the Countryside and Rights of Way Act 2000, paragraphs 176 and 185c of the National Planning Policy Framework (NPPF) and Delivery Policy ES7 of the Stroud District Local Plan 2015.

Lack of assessment of landscape and visual impact

The site is located within the Cotswolds National Landscape, within which there is a duty to have regard to the purpose of conserving and enhancing natural beauty. Within this context paragraph 176 of the National Planning Policy Framework further states that great weight should be given to

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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

conserving and enhancing landscape and scenic beauty. These objectives are reflected in Delivery Policy ES7 of the Stroud District Local Plan 2015.

The Board is concerned that at the lack of detailed assessment of the proposal against any national or local planning policies relating to landscape matters, in particular Stroud Local Plan Delivery Policy ES7 which states that priority will be given to the conservation and enhancement of the natural and scenic beauty of the landscape whilst taking account of the biodiversity interest and the historic and cultural heritage.

Delivery Policy ES7 also states that in all locations development proposals should conserve or enhance the special features and diversity of the different landscape character types found within the District and priority will be given to the protection of the quality and diversity of the landscape character. The supporting text of Delivery Policy ES7 states that proposals for development within or affecting the AONB will be expected to have regard to the Cotswold Conservation Board Management Plan, which is a material consideration in the determination of this application.

Policy CE1 of the Cotswolds 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. 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.

With regards to potential impacts on landscape character, the proposed development is located in the 'High Wold Valley' Landscape Character Type (LCT) 8 in the Cotswolds AONB Landscape Character Assessment referred to above) which is particularly sensitive to change. Painswick is specifically mentioned in the discussion of landscape sensitivity as being sensitive to further development on its fringes.

Section 8.1 of the LS&G lists the following as potential adverse landscape implications of the development, expansion and infilling of settlements:

- Erosion of the rural character of the valleys and the landscape setting of historic villages;
- Intrusion of expanded settlements onto the highly visible valley sides;
- Increase in light pollution;
- Degradation of views across and along the valley;

Whilst the applicant's Planning Statement briefly discusses the potential landscape impact of the scheme at paragraphs 5.72 to 5.78, no further evidence is provided to support, or enable an objective assessment of, this statement. Although the Planning Statement acknowledges that the site lies within the Cotswolds AONB, no further assessment of the proposal is made in AONB terms. Whilst a full LVIA would clearly not be required due to the scale of the proposal, no attempt has been made, for example, to describe the local landscape character, assess the baseline landscape and visual contribution of the current site to the protected landscape of the AONB or assess the potential impact of the new dwellings, the degree of change that would occur and the degree of harm which may arise from the proposal.

This is surprising given a previous application for residential development on this site (appn. ref. S.16/2281/FUL) was refused by the Council. Indeed, one of the reasons for refusal related to its impact upon the natural beauty of the AONB and how the built form would be apparent locally and in

long range views, resulting in the erosion of a character that makes Painswick a unique place to live and visit.

Whilst it is understood that this application is made in outline form with only access applied for in detail, it is nonetheless noted that the applicant has submitted detailed perspective views, floor plans and 'design passports' for each of these self-build plots. This will clearly establish parameters for what appears to be three substantial dwellings which could significantly urbanise what has been identified by the Council in their previous decision as a 'green space that forms part of the beauty of this part of the AONB'. We also note the extensive glazing shown on the southern elevations which may be of concern in relation to potential light spill and reflective glare.

The submission of the further information discussed above will allow the Board to draw a more definitive conclusion on the potential impacts of the scheme and whether, in our view, the application complies with the requirements of national and local planning policy and guidance.

Without prejudice, should the Council be minded to grant planning permission, we would request that appropriate pre-commencement planning conditions relating to the above issues are imposed in the interests of the conservation and enhancement of the landscape and scenic beauty of the National Landscape.

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

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