



Rachel Brown
Stroud District Council
Ebley Mill
Ebley Wharf
Stroud
GL5 4UB

By email only to: rachel.brown@stroud.gov.uk

4 July 2022

Dear Rachel,

APPLICATION NO: S.22/1295/FUL

DESCRIPTION: Conversion of barn and change of use to residential (C3) as holiday accommodation

LOCATION: Land Adjoining Streamside Cottage, Coombe, Wotton-Under-Edge, Gloucestershire

Thank you for consulting the Cotswolds Conservation Board ('the Board') on this proposed development, which is 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) 3 (Rolling Hills and Valley);
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)) particularly, in this instance, regards to LCT 3 ([link](#)) including Section 3.4;
- 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](#)).

For the reasons outlined in Annex 1 below, the Board considers 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 and Delivery Policy ES7 of the Stroud District Local Plan 2015.

Accordingly, we wish to raise a **holding objection** pending the submission of further information to allow the Board to make an appropriate assessment of the proposal.

Cotswolds Conservation Board

The Old Prison, Fosse Way, Northleach
Gloucestershire GL54 3JH
01451 862000
info@cotswoldsaonb.org.uk

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

simon.joyce@cotswoldsaonb.org.uk | 07808 391227

ANNEX 1: COTSWOLDS NATIONAL LANDSCAPE CONSULTATION RESPONSE IN RELATION TO PLANNING APPLICATION S.22/1295/FUL

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 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 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 'Rolling Hills and Valleys' Landscape Character Type (LCT 3 in the Cotswolds AONB Landscape Character Assessment referred to above) which is particularly sensitive to change. This is because these valleys are quiet rural landscapes with strong associations of peace, tranquillity and a sense of remoteness. The Board's Landscape Strategy and Guidelines (LS&G) for LCT3 characterises the area's landscape sensitivity as *"The upper valley sections represent quiet rural landscapes with strong associations of peace, tranquillity and a sense of remoteness. Landscape character is strong, and these sections of the valleys are highly sensitive to developments that may compromise these characteristics"*.

Section 3.4 of the LS&G lists the following as potential adverse landscape implications of the conversion of traditional farm buildings:

- Erosion of distinctive features and loss of Cotswold character;
- Domestication of existing agricultural vernacular and character;

- Suburbanisation of the agricultural landscape by the introduction of gardens e.g. ornamental garden plants and boundary features, parking areas and lighting.

We have concerns that the conversion of the barn and the establishment of a residential curtilage, parking and the potential for domestic paraphernalia to be located within the garden area would combine to aid the urbanisation of what is a sensitive and attractive setting, which would be contrary to the advice contained within the LS&G and by extension Policy CE1 of the AONB Management Plan and Local Plan Delivery Policy ES7. We note that no detail has been provided on landscaping proposals and would welcome the submission of further details by the applicant, including a section of the site from the west to illustrate the height of the proposed landscaping, particularly bearing in mind the parking area is elevated. Similarly, the submitted plans do not appear to establish a boundary in front of the main elevation of the barn and further clarification would be welcomed on this point.

We also have concerns regarding the visual impact of the proposal, particularly on users of the Cotswolds Way (Wotton Under Edge footway CWE25) as they approach the site along Dyers Brook. Walkers approaching the site from the west would have a clear view of the barn for some distance whilst walking towards it, it would comprise a significant feature in their view and such users of a National Trail would be of very high sensitivity to change.

Lighting

The applicant has also not provided details of any external lighting that would be associated with the proposed development, both on the barn itself and on/around the car parking area and pathway to the barn. In line with Policy CE5 (Dark Skies) of the Cotswolds AONB Management Plan, lighting should be avoided if possible. If it cannot be avoided, it should be minimised.

Any lighting would introduce a 'lit element' into what would otherwise be a relatively dark night-time landscape with these dark skies being one of the 'special qualities' of the Cotswolds National Landscape.

Paragraph 185c of the National Planning Policy Framework ('NPPF') states that planning decisions should ensure that new development is appropriate for its location and in doing so they should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. Paragraph 001 of the Planning Practice Guidance ('PPG') on Light Pollution (Paragraph: 001 Reference ID: 31-001-20191101) states that 'intrinsically dark landscapes' are those entirely, or largely, uninterrupted by artificial light. National parks ... can serve as good examples'. As AONBs have the same level of protection with regards to landscape and scenic beauty as national parks within the NPPF and PPG and dark skies are one of the special qualities of the Cotswolds National Landscape, we consider it reasonable to treat the National Landscape as an 'intrinsically dark landscape' in NPPF and PPG terms.

Accordingly, further 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) as well as the ILP Guidance Note for Reduction of Obtrusive Light (updated in 2021) and the CfDS Good Lighting Guide which form Appendices B and C of the Board's Dark Skies & Artificial Light Position Statement (linked above).

Other matters

Whilst we are supportive of sustainable tourism proposals within the National Landscape and this support is reflected within Policy UE1 of the AONB Management Plan, this should be achieved in a manner compatible with the conservation and enhancement of the National Landscape's natural beauty. We note that the application seeks a change of use of the barn to residential (C3) as holiday accommodation and, without prejudice, should the Council be minded to grant planning permission we would request that appropriate conditions are imposed to restrict its use to holiday accommodation only.

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