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9 August 2022

Dear Ceri,

**APPLICATION NO:** S.22/1518/FUL

**DESCRIPTION:** Proposed vehicular access road and parking area

**LOCATION:** 3 Bradley Road, Wotton-Under-Edge, Gloucestershire, GL12 7DT

The above planning application, which is for a development that would be located within the Cotswolds National Landscape<sup>1</sup>, has been brought to the attention of the Cotswolds Conservation Board.

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.<sup>2</sup> 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<sup>3</sup>:

- 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 3.1;
- Cotswolds AONB Local Distinctiveness and Landscape Change ([link](#));
- Cotswolds Conservation Board Position Statements ([link](#)) particularly, in this instance, with regards to 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.

We note that a similar proposal (appn. ref. S.11/1569/FUL) was refused by the LPA in 2011 for three reasons: the adverse impact of the proposal on the character and appearance of the AONB; an insufficient assessment of impacts upon the Cotswold Way National Trail; and lack of geotechnical details to assess the stability or otherwise of the land or hill face. From reviewing the information

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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](http://cotswoldsaonb.org.uk)

*Chairman:*  
**Brendan McCarthy**  
*Vice Chair:*  
**Rebecca Charley**

submitted, it appears that the applicant has not fully addressed any of these previous reasons for refusal.

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 potential impacts of the proposal.

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**

[simon.joyce@cotswoldsaonb.org.uk](mailto:simon.joyce@cotswoldsaonb.org.uk) | 07808 391227

## ANNEX 1: COTSWOLDS NATIONAL LANDSCAPE CONSULTATION RESPONSE IN RELATION TO PLANNING APPLICATION S.22/1518/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. In 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 also reflected in Delivery Policy ES7 of the Stroud District Local Plan 2015.

The Board is concerned 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. The applicant states in their Design & Access Statement that the potential for an adverse impact on 'escarpment' landscape character and harmful expansion of development into the open countryside had been raised by the LPA at pre-application stage, however no further assessment of, or justification for, the proposal has been provided on these matters.

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. Section 3.1 of the LS&G lists the "*suburbanisation of hillsides...by the introduction of...boundary features...[and] parking areas*" as a potential adverse landscape implication of new development in rural valley settlements such as Wotton-under-Edge.

The creation of a proposed access from Old London Road to a parking area on land currently between 12 and 13m above the access point would likely require the removal of a significant section of the roadside bank which would adversely impact the heavily vegetated character of this narrow rural lane. The parking area itself would be almost a metre lower than the present height of the land in this location and the retaining gabion basket walls are shown as being almost 4m in height in places.

The officer's report for the previously refused application refers to that similar proposal as involving "*massive engineering works on a steep hill face*".

The applicant briefly refers to the possibility of establishing landscaping to mitigate the visual impact of the parking area and retaining walls, but provides no detailed proposals. The submitted sections show the access track being almost level with the top of the indicative planting; on this basis it would provide little screening. More fundamentally, the creation of the access route itself and the reprofiling (lowering) of the land for a significant distance on either side of the access point to achieve visibility splays are, in our view, likely to have a significant adverse landscape and visual impact when viewed from Old London Road.

We share the concerns expressed by Wotton-under-Edge Town Council regarding the use of gabion baskets for the retaining structures, which as mentioned above, are shown as being up to almost 4m in height in some of the sectional drawings. Such features are not characteristic of boundary treatments in this part of the Cotswolds and would likely be harmful to the character and appearance of the area.

We also have concerns regarding the visual impact of the proposal on users of the Cotswolds Way. The access road and parking area would comprise a new, significant and incongruous feature on this well-used section of a National Trail where users of a nationally-promoted route would be of very high sensitivity to change.

### **Lack of supporting information**

The Board is extremely concerned that no geotechnical information or assessment has been submitted in relation to the stability of the land upon which the access, drive and parking area are proposed. The hillside is known locally to be prone to instability and landslip and the Town Council has also highlighted its concerns on this matter. The Board has already spent a large sum of money on works to reinstate and stabilise the Cotswold Way National Trail immediately north of the site as it runs from the bottom of Wotton Hill to Gloucester Street earlier this year due to localised land slippage which had led to the erosion of the footpath.

We are also concerned that the proposal would likely require the removal of trees and other plants and undergrowth or at the very least the creation of a roadway within tree root protection areas, but the applicant has neither provided a tree survey nor any ecological study to assess the potential impacts of the proposed works.

### **Lighting**

The applicant has also not provided details of any external lighting that would be associated with the parking area or driveway. 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.

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).



## 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](http://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](http://www.cotswoldsaonb.org.uk/management-plan)
  - b. Cotswolds AONB Landscape Character Assessment  
[www.cotswoldsaonb.org.uk/lca](http://www.cotswoldsaonb.org.uk/lca)
  - c. Cotswolds AONB Landscape Strategy and Guidelines  
[www.cotswoldsaonb.org.uk/lsg](http://www.cotswoldsaonb.org.uk/lsg)
  - d. Cotswolds AONB Local Distinctiveness and Landscape Change  
[www.cotswoldsaonb.org.uk/ldlc](http://www.cotswoldsaonb.org.uk/ldlc)
  - e. Cotswolds Conservation Board Position Statements  
[www.cotswoldsaonb.org.uk/ps1](http://www.cotswoldsaonb.org.uk/ps1)  
[www.cotswoldsaonb.org.uk/ps2](http://www.cotswoldsaonb.org.uk/ps2)