

22nd November 2019

Bob Rustic
Case Officer
Planning Department
Tewkesbury Borough Council



By email only to developmentapplications@teewkesbury.gov.uk

Dear Mr Rustic

19/00722/FUL, 19/00723/FUL and 19/00724/FUL

New agricultural buildings, etc.

Land at Berry Wormington, Stanton, Gloucestershire

Thank you for consulting the Cotswolds Conservation Board ('the Board') on the above planning applications. Thank you, also, for providing the Board with extra time to respond to these consultations. The Board wishes to make the following comments on these three planning applications.

As you will be aware, the Board objected to the previous planning applications for this site (18/00883/FUL, 18/00884/FUL, 18/00885/FUL and 18/00886/FUL). The Board subsequently provided pre-application advice to the applicant in June 2019, before they submitted the current planning applications.

We are very pleased to see that much of our pre-application advice has been taken on board in terms of location, layout and potential landscaping and biodiversity enhancement measures. The reduction in the number of buildings (from four to three) and overall footprint of these buildings (from approximately 1,310m² to 761m²) is also a significant factor. The new photomontages also considerably help to assess the visual impact of the current proposals. The current proposals therefore represent a significant improvement on the previous planning applications.

The Board considers that the potential adverse effects on the Cotswolds Area of Outstanding Natural Beauty (AONB) would be significantly reduced, compared to the previous planning applications. In particular, the adverse visual effects for receptors on the Cotswold Way National Trail on the Cotswold escarpment and the B4632 would be reduced, as would the adverse effects on the setting of the nearby Grade II listed building of Berry Wormington Farmhouse.

However, given the high landscape sensitivity of this location, lying as it does between the Cotswold Escarpment and the Escarpment Outliers of Dumbleton and Alderton Hills, in an area with relatively few man-made structures, the Board considers that the overall effect of the proposed developments on the Cotswolds AONB is still likely to be adverse, albeit relatively minor compared to the previous applications.

The significance of these residual adverse effects will depend, to some degree, on how the applicant addresses the issue of light pollution, as outlined below.

Conserving, enhancing, understanding and enjoying the Cotswolds Area of Outstanding Natural Beauty

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The table in Section 17.3.8 (page 22) of the Planning Statement / Design & Access Statement proposes a lighting scheme that is '*to be sympathetic to maintaining dark skies and areas of dark landscape*'. Whilst the Board supports this aspiration, we are disappointed that the planning applications do not expand on how this will be achieved. The dark skies of the AONB are one of its special qualities. In other words, these dark skies are one of the attributes of the AONB which makes it so outstanding that it is in the nation's interest to safeguard it. Therefore, prior to a decision being made on these planning applications, the applicant should be required to submit further details of how they propose to address this issue.

The open-sided layout of two of the buildings and the multiple roof lights on the third building pose the risk of light pollution from within the buildings. Any external lighting would potentially cause additional light pollution. Therefore, if the development is approved, stringent conditions should be imposed to (i) avoid and (ii) minimise light pollution, in line with Policy CE5 (Dark Skies) of the Cotswolds AONB Management Plan 2018-2023.¹ As a minimum, the development should be consistent with the Board's Position Statement on Dark Skies and Artificial Light, including the guidance contained therein.^{2 3 4 5}

The Board recognises the need for viable agricultural businesses with the AONB. However, given that much of the information relating to the need for the buildings has been redacted, it is difficult to fully assess the need for the buildings and the extent to which any economic benefits might outweigh the adverse effects. As the local planning authority (LPA) will have been provided with the un-redacted information, it will be for the LPA to decide the overall balance of adverse and beneficial effects.

It is worth noting that the Board considers that any potential future proposals to build additional buildings in this location are highly unlikely to be appropriate. This is because we consider that any further development is likely to exceed the 'landscape capacity' of the site (i.e. the capacity of the site to accommodate development without significant adverse effects on the Cotswolds AONB).

Should you require any further clarification on any of the points raised above please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink that reads "John Mills". The signature is written in a cursive style with a long, sweeping underline.

John Mills MRTPI
Planning and Landscape Officer
Cotswolds Conservation Board

¹ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2018/12/Management-Plan-2018-23.pdf>

² <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2019/03/Cotswolds-Dark-Skies-Artificial-Light-Position-Statement.pdf>

³ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2019/03/Cotswolds-Dark-Skies-Artificial-Light-Position-Statement.pdf>

⁴ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2019/03/Dark-Skies-Artificial-Light-Appendix-B-ILP-Guidance-Notes-For-the-reduction-of-Obtrusive-Light.pdf>

⁵ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2019/03/Dark-Skies-Artificial-Light-Appendix-B-CfDS-Good-Lighting-Guide.pdf>