



Jonathan James
Wiltshire Council
County Hall
Bythesea Road
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By email only to: Jonathan.James@wiltshire.gov.uk

1 October 2021

Dear Jonathan

APPLICATION NO: 20/08618/FUL

DESCRIPTION: Installation of a solar farm

LOCATION: Land West of A429 (Crudwell Road), North Malmesbury, Wilts

The above planning application has been brought to the attention of the Cotswolds Conservation Board ('the Board').

We have previously commented on the proposed development in response to the Environmental Impact Assessment (EIA) scoping consultation, in a letter dated 12 February 2021. In that response, we identified that the proposed development would be located approximately 800m, at its closest point, from the boundary of the Cotswolds National Landscape.¹ We recommended that, given this relatively close proximity and the type of development being proposed, consideration should be given to potential impacts on views from the National Landscape.

We explicitly identified the following locations in this regard:

- along the byway on the Fosse Way Roman Road (Public Rights of Way Reference: BROK22), to the north and south of the B4014 (i.e. approximately between Grid References ST9209160 and ST91359075);
- along the B4014 between its junction with the above byway (Grid Reference: ST91489092) and the road junction at Sunset Hill Cottages (Grid Reference: ST920999009), particularly where there is little hedging on the north side of the road;
- the footpath north of Brokenborough (Public Rights of Way Reference: BROK10) (approximately Grid Reference: ST91368984).

Unfortunately, it does not appear that the views from any of these locations, or any other locations in the Cotswolds National Landscape or along its boundary, have been explicitly assessed.

We are aware that the Council's Landscape Officer has also flagged this issue. We are also aware that the applicant is likely to be asked to provide additional information in this regard.

We therefore request that the applicant be required to explicitly assess the visual effects of the proposed development on views from the locations / route outlined above, choosing specific viewpoints that have relatively good inter-visibility with the proposed development site.

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

This should include an assessment of winter-time conditions when there would be less vegetation to screen the development. It should also include consideration of:

- glint or glare caused by the reflection of sunlight off the solar panels during daylight hours and of any light pollution that might be associated with the development;
- the introduction of lit elements into the night-time landscape as a result of any lighting associated with the proposed development.

If the assessment indicates that the proposed development could adversely affect views from the Cotswolds National Landscape, consideration should be given to excluding the two most westerly fields from the proposed development (i.e. the fields to the north and south of 'The Wedge' plantation) in order to reduce these adverse effects.

It should be noted that one of the 'special qualities' of the Cotswolds National Landscape is '*an accessible landscape for quiet recreation for both rural and urban users, with numerous walking and riding routes*'. This adds to the value / sensitivity of visual receptors within the Cotswolds National Landscape and on its boundary. As such, the sensitivity of visual receptors in these locations is likely to be high or very high, which would increase the overall significance of any adverse visual effects.

It should also be noted that case law has clarified that great weight should be given to the extent to which development outside an Area of Outstanding Natural Beauty (AONB) adversely affects views from the AONB, in line with paragraph 176 of the National Planning Policy Framework (NPPF). Further guidance on this issue is provided in the Board's Position Statement on 'Development in the Setting of the Cotswolds AONB' (see below).

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 Cotswolds 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](#)), particularly, in this instance, with regards to Policy CE1 (Landscape), which specifies that development proposals should ensure that views out of the Cotswolds National Landscape are conserved and enhanced;
- Cotswolds AONB Landscape Character Assessment ([link](#)), particularly, in this instance, with regards to Landscape Character Type 11 (Dip-slope Lowland);
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)), particularly, in this instance, with regards to LCT 11 ([link](#)), including Section 11.4;
- Cotswolds Conservation Board Position Statements ([link](#)), particularly, in this instance, with regards to Development in the Setting of the Cotswolds AONB ([link](#)), Renewable Energy ([link](#)) Tranquillity (Section 5.2) ([link](#)).

Yours sincerely,



John Mills

Planning & Landscape Lead

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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. ([Link](#)).
- 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 Conservation Board Position Statements
www.cotswoldsaonb.org.uk/ps1
www.cotswoldsaonb.org.uk/ps2