



David Ditchett
Planning Department
Cotswold District Council
Trinity Road
Cirencester
GL7 1PX

By email only to: David.Ditchett@publicagroup.uk and planning@cotswold.gov.uk

9 April 2021

Dear David

APPLICATION NO: 21/00466/FUL

DESCRIPTION: Proposed new private equestrian facilities comprising a change of use from agriculture to equestrian use, erection of an indoor riding arena with a linked stable building, outdoor riding arena, sand paddocks, gallops, associated infrastructure, demolition of two outbuildings and construction of a temporary access track for construction purposes.

LOCATION: Duntisbourne House, Duntisbourne Abbots, Cirencester, Gloucestershire GL7 7LE

The above planning application, which is for a development that would be located within the Cotswolds National Landscape¹, has been brought to the attention of the Cotswolds Conservation Board ('the Board').

We recognise that the keeping of horses is a popular pastime, or (in some instances) business, in the Cotswolds National Landscape, which makes a valuable contribution to the local economy. We also recognise that the proposed equestrian facilities would be located on a site that is robustly contained by well-established tree belts, woodland and hedgerows, which screen views into the estate. As such, we acknowledge that visual impacts are likely to be limited in most respects, particularly given the limited number of publically accessible viewpoints (such as public rights of way) in the local vicinity.

However, we do have a number of concerns about the proposed development, particularly with regards to potential impacts on the dark skies of the Cotswolds National Landscape, as outlined below. For these reasons we object to the proposed development.

Dark Skies

The dark (night-time) skies of the Cotswolds National Landscape are one of the area's 'special qualities'. As such, they are a key attribute on which the priorities for the area's conservation, enhancement and management should be based. The location of the proposed development has very little night-time light pollution.¹

¹ Cotswolds Conservation Board (2019) *Dark Skies & Artificial Light Position Statement*. Appendix A. ([Link](#)).

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

In addition, the Board's guidance relating to the keeping of horses and the establishment of equestrian facilities² states that '*any lighting should be designed to minimise light pollution, e.g. low level and directed downwards and fitted with timers.*'

The extent to which the proposed development would adversely affect these dark skies and the extent to which it would comply with this guidance is, therefore, a key consideration.

According to the applicant's supporting information³, there would be glazing along the entire length of the indoor arena's roof ridge (a length of approximately 50m) and on the peak of the stable roof. This is in addition to the 3m high windows that run the length of the indoor arena.

The extent of the roof-top glazing is of particular concern. This is because the lighting from within the buildings would be directed upwards into the night sky, which could cause 'sky glow'. According to the obtrusive light limitations specified in the 'Guidance Notes for the Reduction of Obtrusive Light'⁴, 0% of the light from a light source in an Area of Outstanding Natural Beauty (AONB) should be permitted to go directly into the sky. It is highly unlikely that the proposed development would comply with this threshold.

We are also concerned that the proposed development would introduce 'lit elements' into a characteristically dark landscape. In other words, this new lighting would be conspicuously out of keeping with the local nocturnal light levels and would be seen as such across a wide area.

The glazing in the roof of the indoor arena would be approximately 12m above ground level. The 'visual panorama software' shown in Appendix 1 indicates that lighting at this elevation, in this location, would be visible up to approximately 80km away. We acknowledge that the surrounding vegetation would reduce the visibility of the lit elements to some degree. However, this 'screening' would be more limited in winter months and the height of the glazing in the roof would potentially exceed the height of the denser vegetation.

Scale of the proposed earthworks and development

The proposed development covers a substantial area and would introduce a substantial mass of built development into a relatively isolated, rural landscape. For example, the site covers 3.6ha and the proposed buildings would have a footprint of 2,680m². This scale of development significantly exceeds the thresholds for major development, as defined in the Town & Country Planning (Development Management Procedure) (England) Order 2015.⁵ Whilst this doesn't necessarily make it major development in the context of paragraph 172 of the National Planning Policy Framework, it is

² Cotswolds Conservation Board (2017) Keeping of Horses & Ponies – Position Statement ([link](#)) and leaflet ([link](#)). See also Section 9.11 of the Cotswolds Landscape Strategy and Guidelines relating to Landscape Character Type 9 (High Wold Dip Slope) ([link](#)).

³ For example, the 'Proposed East & West Elevations'.

⁴ Institution of Lighting Professionals (2011) *Guidance Notes for the Reduction of Obtrusive Light*. N.B. This document forms Appendix B of the Board's Dark Skies & Artificial Light Position Statement ([link](#)). Although this guidance relates primarily to exterior lighting installations, we consider that the same principles should be applied to light sources within buildings.

⁵ <https://www.legislation.gov.uk/ukxi/2015/595/article/2/made>. For example, the thresholds for 'major development', in this legislation, include development carried out on a site having an area of more than 1ha and / or the provision of buildings where the floor-space to be created by the development is 1,000 square metres or more.

still an important consideration, particularly in the context of an isolated, rural location within a protected landscape.

In addition, the proposed development would involve substantial earthworks, levelling almost 1ha of what is currently gently sloping land to make room for the indoor arena, stable block and outdoor arena. The ground level would be reduced by approximately 3m at the eastern edge of these earthworks, with the earthworks extending approximately 65m westwards from this eastern edge and approximately 130m north to south. Based on these measurements, the earthworks would require approximately 13,000m³ of material to be dug up. Whilst some of this would be used to infill the western side of the site, the vast majority would be excess spoil.

The applicant's supporting information indicates that excess spoil would be 'landscaped' into the field at the north end of the proposed site area. However, very little detail is provided regarding the extent to which the landform in this location would change as a result of this excess spoil being deposited here.

In addition, the applicant's supporting information identifies that the field where the excess spoil would be deposited would also be the 'drainage field'. It is not clear how the field where the landform would have to be raised (as a result of the excess spoil being deposited there) could also act as the drainage field (which presumably required a lower elevation).

Overall, we question whether the scale of the proposed development is necessary or appropriate for what is, essentially, a private equestrian facility for a family of six people. In particular, we question the need for- and appropriateness of - an indoor arena as part of the proposed development.

Recommendations

Dark Skies

We recommend that, before a decision is made on this planning application, the applicant should be required to provide a more comprehensive assessment of potential light pollution from the proposed development. This should include an assessment of:

- the extent to which the lighting, including any external lighting, would comply with relevant guidance (including the guidance referred to above);
- locations where the lighting associated with the proposed development would be visible from.⁶

The applicant should also be required to identify further measures to (i) avoid and (ii) minimise light pollution⁷, including sky glow and the introduction of lit elements. Ideally, the proposed glazing in the ridge of the indoor arena roof and in the peak of the stable block roof should be removed (or at least significantly reduced).

Without prejudice, if Cotswold District Council is minded to grant planning permission, conditions should be imposed to restrict the extent to which the indoor arena (and, to a lesser degree, the

⁶ Photomontages would potentially be useful in this regard.

⁷ Policy CE5 (Dark Skies) of the Cotswolds AONB Management Plan 2018-2023 ([link](#)) specifies that '*proposals that are likely to impact on the dark skies of the Cotswolds AONB should have regard to these dark skies by seeking to (i) avoid and (ii) minimise light pollution*'.

stable) could be used during hours of darkness. Ideally, there would be a condition not to use the indoor arena - and / or not have lighting on in the indoor arena - during hours of darkness.

Scale of the proposed earthworks and development

Before a decision is made on this planning application, we recommend that the applicant should be required to provide further details on the proposed earthworks including:

- the amount of material to be excavated;
- the 'net' amount of excess spoil;
- the area of land over which the excess spoil will be spread;
- the change in landform and elevation resulting from excess spoil being deposited;
- the type and quantity of material that is anticipated in the excess spoil (e.g. soil, limestone, etc.);
- whether any excess spoil will need to be disposed of off-site and, if so, how much;
- clarification of how the field where excess spoil is being deposited can also act as the drainage field.

We recommend that consideration should also be given to withdrawing the current proposal and submitting a smaller scale proposal without an indoor arena.

If you have any queries regarding these comments, please do get in touch.

Yours sincerely,

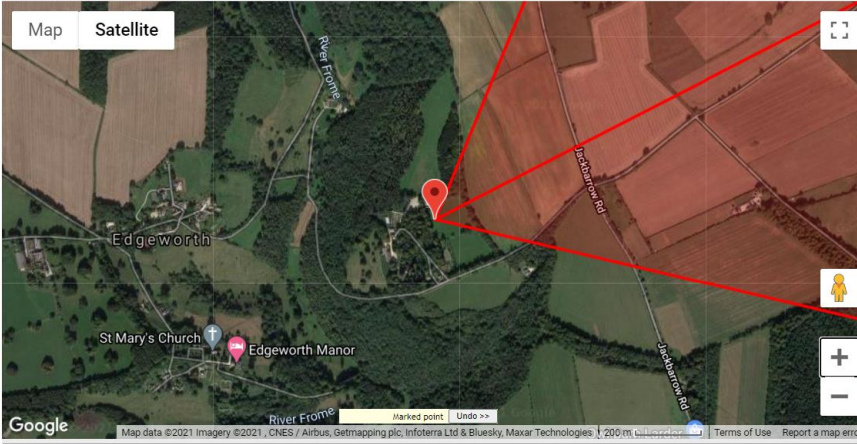
A handwritten signature in black ink that reads "John Mills". The signature is written in a cursive style with a long, sweeping underline.

John Mills
Planning & Landscape Lead
john.mills@cotwoldsaonb.org.uk | 07808 391227

APPENDIX 1. Visual Panorama

The information presented below uses visual panorama software from the Ulrich Deuschle website (https://udeuschle.de/panoramas/makepanoramas_en.htm). A 'camera height' of 12m has been used to indicate the height of the glazing on the ridge of the indoor arena roof. The visual panoramas indicate that the most distant visible point from this elevation is approximately 81km away. Conversely, this information indicates that the light emitted through the glazing in the indoor arena roof could potentially be seen from a considerable distance, across a large area. This lighting would be conspicuously out of keeping with the local nocturnal light levels.

Looking north-east



Second option: Select viewpoint from a list

Name of the summit begins with contains (* as wildcard)

View direction N NE E SE S SW W NW 360°

Third option: Set viewpoint data directly

Latitude (°): Longitude (°): Altitude (m): Camera height (m): Look for summit point automatically

Set panorama data directly

View direction (°): Left edge (°): Zoom factor: or Resolution (pix/deg):

Horizontal extension (°): or Right edge (°):

Preview:

Altitude: 222 m
Most distant point: 81 km

Looking south-west



Second option: Select viewpoint from a list

Name of the summit begins with contains (* as wildcard)

View direction N NE E SE S SW W NW 360°

Third option: Set viewpoint data directly

Latitude (°): Longitude (°): Altitude (m): Camera height (m): Look for summit point automatically

Set panorama data directly

View direction (°): Left edge (°): Zoom factor: or Resolution (pix/deg):

Horizontal extension (°): or Right edge (°):

Preview:

Altitude: 222 m
Most distant point: 68 km