

13th December 2019

Rachel Brown
Planning Officer
Stroud District Council
Ebley Mill
Stroud GL5 4UB



By email only to planning@stroud.gov.uk

Dear Rachel

S.19/2094/FUL

**Material change of use of land from agriculture to the processing, seasoning, drying, storage, sale and supply of firewood (retrospective)
Lower Kilcott Farm, Kilcot Road, Hillesley, Wotton-Under-Edge, Gloucestershire GL12 7RL**

The Cotswolds Conservation Board recognises the need for viable, rural businesses within the Cotswolds Area of Outstanding Natural Beauty (AONB). Such businesses should make a positive contribution to the statutory purpose of AONB designation, which is to conserve and enhance the natural beauty of the AONB. However, the Board is of the opinion that the proposed development could potentially have a significant adverse impact on this statutory purpose.

The Board is particularly concerned about the potential adverse impacts on the tranquillity, landscape character and dark skies of the Cotswolds AONB and on the recreational users of the Cotswold Way National Trail and other rights of way. These concerns are exacerbated by the lack of information provided by the applicant.

For these reasons, the Board OBJECTS to the proposed development.

Based on the information currently available and on the high landscape sensitivity of this section of the Cotswolds AONB, the Board recommends that planning permission should be refused.

The Board's concerns are outlined in more detail in Annex 1 below.

If you have any queries regarding the Board's response, please do not hesitate to get in touch.

Yours faithfully,

John Mills MRTPI
Planning and Landscape Officer

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

ANNEX 1. THE CONCERNS OF THE COTSWOLDS CONSERVATION BOARD REGARDING PLANNING APPLICATION S.19/2094/FUL

Lack of information

The planning application provides very little information on the amount of wood and other material that will need to be imported to - and exported from – Lower Kilcott Farm, both in terms of the wood that will be turned into firewood and the material that will be used in the biomass boiler.

The Board is aware of an independent report by Dowdeswell Forestry Limited, which indicates that the proposed development would involve the import and export of up to 500 tonnes per annum of wood for firewood and an additional 50 tonnes of wood and other material for use in the biomass boiler. The report indicates that this will entail a significant number of vehicle movements (involving tractors, timber trailers and articulated timber lorries), including up to 500 vehicle movements per year to export the firewood that is produced on site.

The applicant should be required to provide a much more comprehensive explanation of the amount of material that would be (and is being) imported and exported, the number and type of associated vehicle movements and the impacts that the development is likely to have on the local road network and on the Cotswolds AONB.

Importance of Tranquillity and Landscape Character

Tranquillity is one of the ‘special qualities’ of the Cotswolds AONB. In other words, it is one of the features of the AONB that makes it so outstanding that it is in the nation’s interest to safeguard it. More information on the issue of tranquillity, and the Board’s recommendations in relation to this issue, is provided in the Board’s Tranquillity Position Statement.¹

Tranquillity is a key component of the landscape character of the Lower Kilcott Farm area. The Cotswolds AONB Landscape Character Assessment² identifies that there are 19 different Landscape Character Types (LCTs) in the Cotswolds AONB. Lower Kilcott Farm is located in LCT 3 (Rolling Hills and Valleys). The Cotswolds AONB Landscape Strategy and Guidelines³ highlights the ‘landscape sensitivity’ of this LCT, stating that *‘the upper valley sections represent quiet rural landscapes with strong associations of peace, tranquillity and a sense of remoteness’*. It adds that *‘landscape character is strong, and these sections of the valleys are highly sensitive to developments that may compromise these characteristics’*.

The issue of tranquillity is addressed in Policy CE4 (Tranquillity) of the Cotswolds AONB Management Plan 2018-2023⁴, which states that proposals that are likely to impact on the tranquillity of the Cotswolds AONB should have regard to this tranquillity, by seeking to (i) avoid and (ii) minimise noise pollution and other aural and visual disturbance.

The issue of landscape character is addressed in Policy CE1 (Landscape) of the Cotswolds AONB Management Plan, which states that proposals should have regard to, be compatible with and reinforce the landscape character of the location.

¹ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2019/06/Tranquillity-Position-Statement-FINAL-June-2019.pdf>

² <https://www.cotswoldsaonb.org.uk/our-landscape/landscape-character-assessment/>

³ <https://www.cotswoldsaonb.org.uk/our-landscape/landscape-strategy-guidelines/>

⁴ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2018/12/Management-Plan-2018-23.pdf>

Impacts on the tranquillity and landscape character of the Cotswolds AONB

Given the number and type of vehicle movements associated with the proposed development, which will involve these vehicles travelling along quiet, single track country lanes, the development is likely to compromise the local landscape character and have a significant adverse impact on the peace, tranquillity and sense of remoteness of this locality. These impacts will be felt not only on the adjacent minor road but in nearby settlements such as Hillesley.

Road verges and roadside boundaries are also likely to be adversely affected as there is not enough room for oncoming vehicles to pass each other without driving onto these verges.

These issues of excessive traffic on minor local roads and lanes, the increase in size of vehicles using these lanes and the associated damage caused to verges and roadside boundaries are all highlighted as being causes for concern for LCT3 in the Cotswolds AONB Landscape Strategy and Guidelines.

Without prejudice, if the development was to be granted planning permission, measures should be put in place to ensure that the development complies with Policies CE1 and CE4 of the Cotswolds AONB Management Plan and with the Board's Tranquillity Position Statement.

Impact on the dark skies of the Cotswolds AONB

Closely associated with the issue of tranquillity is the issue of dark skies. As with tranquillity, dark (night-time) skies are a special quality of the Cotswolds AONB. Lower Kilcott Farm lies within such a dark skies area, with relatively little light pollution, as shown on the Cotswolds AONB Night Lights map.⁵

The issue of dark skies is addressed in Policy CE5 (Dark Skies) of the Cotswolds AONB Management Plan 2018-2023, which states that proposals that are likely to impact on the dark skies should have regard to these dark skies by seeking to (i) avoid and (ii) minimise light pollution. This issue is also addressed in the Board's Dark Skies and Artificial Light Position Statement.⁶

The planning application provides very little information about the hours of operation and the lighting associated with the proposed development. This issue would be particularly significant during the winter months when the development is likely to be operational during hours of darkness.

Without prejudice, if the development was to be granted planning permission, measures should be taken to ensure that the development complies with Policy CE5 of the Cotswolds AONB Management Plan and with the Board's Dark Skies and Artificial Light Position Statement and associated guidance.

Impacts on recreation

The hugely popular Cotswold Way National Trail and the Monarch's Way both follow the single track road that passes Lower Kilcott Road, for a distance of approximately one kilometre. The vehicle movements associated with the proposed development could be a

⁵ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2019/03/Dark-Skies-Artificial-Light-Appendix-A-Night-lights.pdf>

⁶ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2019/03/Cotswolds-Dark-Skies-Artificial-Light-Position-Statement.pdf>

significant hazard for users of these rights of way. They would also significantly reduce the users' enjoyment of this section of these routes. With the Cotswold Way being a National Trail, any such adverse impacts would be of national significance.

Without prejudice, if the development was to be granted planning permission, appropriate measures would need to be put in place to ensure the safety of these recreational users and to ensure that they have an experience that is in keeping with what would be expected of a National Trail.