

25th June 2020

Ceri Porter
Case Officer
Stroud District Council
Ebley Mill
Stroud GL5 4UB

By email only to planning@stroud.gov.uk



Dear Ceri

S.20/0799/FUL - The proposed provision of a small stable block for the accommodation of horses and associated equipment required at the holding for their welfare - Land Opposite New Inn, Waterley Bottom, North Nibley, Gloucestershire.

Thank you for consulting the Cotswolds Conservation Board ('the Board') on the above planning application.

The Board recognises that the keeping of horses is a popular pursuit in the Cotswolds Area of Outstanding Natural Beauty (AONB). Delivery Policy ES9 of the Stroud Local Plan requires such proposals to either enhance or not diminish the environmental quality of those rural areas in which it is to take place. Delivery Policy ES7 of the Local Plan gives priority to the conservation and enhancement of the natural and scenic beauty of the Cotswolds AONB landscape.

As outlined below, the Board considers that the proposed stable block could potentially conflict with these two policies and with the policies of the Cotswolds AONB Management Plan 2018-2023.

In addition, the Board is very concerned about the additional impacts of the earthworks that have already been implemented on site and the construction of the adjacent agricultural building on the same site, which has already started. As these works have been implemented without properly following permitted development procedures, permitted development rights do not apply. Therefore, the Board considers that these works should be considered to be part of the current planning application. At the very least, they should be a material consideration in the planning decision.

In addition, the Board recommends that the applicant should withdraw the current planning application and halt works on the agricultural building until the current appeals and enforcement action have been resolved.

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

The stable block

The applicant asserts that the proposed stable block would be small. However, none of the information provided with the planning application appears to explicitly state the overall dimensions of the stable block. This is a crucial piece of information that should be provided by the applicant.

The applicant asserts that '*existing landscape features will ensure effective screening and sound deadening*'. The Board acknowledges that the existing and proposed vegetation is likely to provide some degree of screening. However, the 'Section, Site & Location Plan' indicates that the ridge of the stable would be approximately 6m above the base of the

hedge that is adjacent to the road. As such, it would protrude above the hedge, especially when seen from viewpoints on the opposite side of the valley. The existing vegetation would not screen views from the footpath that crosses the north-east corner of the site (North Nibley Footpath 10).

Other aspects of the 'Section, Site & Location Plan' appear to be inaccurate. For example, the Site Plan shows that the stable block is on the south side of the gravel yard, close to the hedge on the southern boundary, whereas the 'Section A-A' seems to show the stable on the north side of the gravel yard, adjacent to the re-graded land. The visual impact of the proposed development will partly depend on whether the Site Plan or Section A-A shows the accurate location of the stable block. The applicant should be required to clarify the plans such that the Site Plan and Section A-A are consistent.

The visual impact of the proposed development relates not only to the stable itself but to the land that is used by the horses on this site. In this regard, it is worth noting that Section 3.7 of the Cotswolds AONB Landscape Strategy & Guidelines states that '*the creation of horse paddocks in visually prominent locations such as roadside and valley side locations should be avoided*'.¹

With regards to impacts on landscape character, the proposed development is located in the 'Rolling Hills and Valleys' Landscape Character Type (LCT) (LCT 3 in the Cotswolds AONB Landscape Character Assessment²) 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. As such, the erection of an isolated building, is likely to diminish the environmental quality of this locality.

Given the high sensitivity of this locality, the Board considers that it would be appropriate for the applicant to provide wire-frame images of the stable (and barn and earthworks) on photomontages of views from key viewpoints. These viewpoints should include:

- The entrance to the site;
- The footpath that crosses the north-east corner of the site (North Nibley Footpath 10);
- A suitable viewpoint, with a clear view of the site, on the road running east-west on the south side of the valley (i.e. between Waterley Farm and Pitt Court).

The Defra MAGIC website shows the northern half of the site as being lowland calcareous grassland habitat. This is a priority habitat, both nationally and for the Cotswolds AONB, as highlighted in Appendix 8 of the Cotswolds AONB Management Plan 2018-2023. The Board is concerned that horses grazing on the steep slopes where this priority habitat is located could potentially have an adverse impact on this habitat, for example, as a result of erosion. This issue is recognised in the supporting text for Delivery Policy ES9 of the Stroud Local Plan, which states '*changes in grazing regime may affect ecological diversity of grassland*'.

The applicant indicates, in the Design and Access Statement, that the proposed development would provide positive economic benefits, including creating and securing local employment and fostering and improving a sustainable local enterprise. However, it is not clear what these economic benefits are or how they would be generated.

¹ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/07/lct-3-rolling-hills-and-valleys-2016.pdf>

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

The applicant has not provided details of the lighting that would be associated with the proposed development. 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. Any lighting associated with the development should be consistent with the Board's Position Statement on Dark Skies and Artificial Light.³

As the applicant has indicated, there have been a number of successful planning applications for stable blocks and similar development proposals within the local area. However, in the Board's opinion, this counts against the proposal rather than in its favour. This is because, as identified in Section 3.7 of the Cotswolds AONB Landscape Strategy and Guidelines, '*a concentration of horse paddocks and associated structures in any one area can have a cumulative harmful impact on landscape character and should be avoided*'.

This adverse cumulative impact is further exacerbated by additional agricultural buildings that have either been built (with or without planning permission) or are being proposed within this section of the valley at Waterley Bottom.

Consideration should be given to the Board's Position Statement⁴ and guidance⁵ on 'The Keeping of Horses and Ponies in the Cotswolds AONB', both in the planning decision and, if planning permission is granted, when setting planning conditions.

Additional considerations

The Board is aware that the site is already the subject of various planning applications, appeals and enforcement action. Given that these appeals and enforcement action have not yet been resolved, the Board recommends that the applicant should be encouraged to withdraw this application (and stop works on the agricultural building) until these issues have been resolved.

The Board is aware that earthworks have already been undertaken on the site, in order to level the land and make room for the proposed stable block and an agricultural building in this steep, valley-side field. It is the Board's understanding that these earthworks did not follow the required procedures to secure permitted development rights. As such, these earthworks should, in effect, be considered to form part of the planning application. At the very least, they should be a material consideration.

The supporting text for Delivery Policy ES9 of the Stroud Local Plan states that '*changes in landform to accommodate new buildings and exercise areas may adversely impact upon landscape character*'. The Board considers that the change in landform at the site of the proposed development does adversely impact upon landscape character.

The Board is also aware that construction work has started on an agricultural building on the same site, directly adjacent to the proposed stable block. Again, it is the Board's understanding that this agricultural building did not follow the required procedures to secure permitted development rights. As such, the agricultural building should also, in effect, be considered to form part of the planning application. At the very least, it should be a material consideration.

³ <https://www.cotswoldsaonb.org.uk/our-landscape/position-statements-2/>

⁴ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/08/keeping-of-horses-and-ponies-2017.pdf>

⁵ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/11/keeping-horses-leaflet-web-version.pdf>

When all of these factors (i.e. the stable block, the earthworks and the agricultural building) are taken into account collectively, the Board considers that the environmental quality of this locality is likely to be diminished significantly and that the proposed development would have a significant adverse effect on the landscape and scenic beauty of the Cotswolds AONB.

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

Yours faithfully,

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

John Mills MRTPI
Planning and Landscape Officer