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23 November 2020

Dear Bob

**APPLICATION NO:** 20/02453/F

**DESCRIPTION:** A fuel depot including ancillary offices, the installation of plant and hardstanding

**LOCATION:** Hornton Grounds Quarry, Hornton

Thank you for consulting the Cotswolds Conservation Board ('the Board') on this proposed development, which would be located in the setting of the Cotswolds National Landscape<sup>1</sup>, approximately 260m from the National Landscape boundary.

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 National Landscape.<sup>3</sup> 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) give explicit consideration to the following Board publications:

- Cotswolds Area of Outstanding Natural Beauty (AONB) Management Plan 2018-2023 ([link](#));
- Cotswolds AONB Landscape Character Assessment ([link](#)), in particular, with regards to Landscape Character Type (LCT) 6 (Ironstone Hills and Valleys) and LCT 7 (High Wold);
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)), in particular, with regards to LCT 6 ([link](#)) and LCT 7 ([link](#));
- Cotswolds Conservation Board Position Statements ([link](#)), in particular:
  - Development in the setting of the Cotswolds AONB ([link](#));
  - Dark Skies & Artificial Light ([link](#)), including Appendices A ([link](#)), B ([link](#)) and C ([link](#));
  - Tranquillity ([link](#)).

Based on the information provided, the Board considers that potential adverse impacts on the Cotswolds National Landscape have not been adequately addressed, as outlined below. As such, we object to the proposed development.

The Cotswolds AONB Landscape Strategy and Guidelines (LSG) indicates that LCT 7 retains a strong sense of remoteness and tranquillity, contributing to its high landscape sensitivity. For LCT6, the LSG indicates that the rural landscape is highly sensitive to development that would introduce urbanising elements to otherwise agricultural areas. Presumably, given the proximity of the proposed development to the Cotswolds National Landscape boundary, the landscape sensitivity in the locality of the proposed development would be similarly high.

#### 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](http://cotswoldsaonb.org.uk)

Chairman:  
**Brendan McCarthy**  
Vice Chair:  
**Rebecca Charley**

The applicant's Landscape and Visual Impact Assessment (LVIA), including the 'Viewpoint Locations' map on page 10, indicates that the proposed development would not be visible to the west of the A422 or north of the minor road approximately 1km to the north of the site. However, this 'zone of visibility' is very crudely drawn and, as such, does not appear to have a robust basis to it.

Given the close proximity of the proposed development to the Cotswolds National Landscape boundary and the fact that views across the landscape are key features of both LCTs, the Board considers that potential visual effects for receptors within the National Landscape (and on its boundary) should be more thoroughly assessed. This should include an assessment of night-time visual effects, as outlined below in relation to the dark skies of the National Landscape.

One of the key features of LCT 6 is the '*distinctive local vernacular with buildings constructed in the warm red brown 'Hornton Stone'*'. Similarly, one of the key features of LCT 7 is the '*use of locally quarried stone for both dry stone walls and houses'*. The local distinctiveness of the Cotswolds National Landscape in this locality could, therefore, be compromised if viable reserves of this Hornton Stone mineral resource is sterilised by other development. This issue needs further consideration in the context of the proposed development in Horton Grounds Quarry.

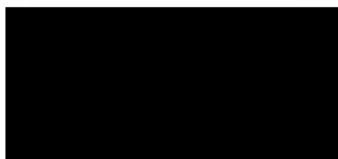
The relative tranquillity of the Cotswolds National landscape is one of the area's 'special qualities'.<sup>3</sup> A key consideration, in this regard, is the potential increase in traffic movements on roads in the National Landscape and along its boundary, including, in this instance, the A422 to the north of the proposed development. The Board's Tranquillity Statement (Section 4.5) indicates that, as a rule of thumb, an increase in traffic movements and / or HGV movements of 10% or more should be considered to be significant.

Whilst the applicant has indicated the number of traffic movements to and from Hornton Grounds Quarry, they have not addressed the associated % increase in traffic / HGV movements on the A422. As such, it is not clear if the development would be compatible with the Board's Tranquillity Position Statement or with Policy CE4 (Tranquillity) of the Cotswolds AONB Management Plan.

Another 'special quality' of the Cotswolds National Landscape is its extensive dark sky areas. These dark sky areas can be adversely affected by new and / or increased levels of light pollution, including where the source of this light pollution is in the setting of the National Landscape. Appendix A of the Board's Dark Skies & Artificial Light Position Statement shows that the area of the proposed development has (or, at least, should have) relatively low levels of light pollution.

The Board is concerned that the lighting associated with the proposed development could potentially increase levels of light pollution in the locality and adversely affect the dark skies of the National Landscape. For example, the proposed lighting could potentially be more visible from locations within the National Landscape than the existing on-site lighting and / or outside of the operating hours of the current on-site lighting. This would not be compatible with the Board's Dark Skies and Artificial Light Position Statement or with Policy CE5 (Dark Skies) of the Cotswolds AONB Management Plan.

Yours sincerely,



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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 'special qualities' of the Cotswolds National Landscape are those aspects of the area's natural beauty which make the area distinctive and which are valuable, especially at a national scale. They are the key attributes on which the priorities for the area's conservation, enhancement and management should be based. The special qualities of the National Landscape are listed in Chapter 2 of the Cotswolds AONB Management Plan 2018-2023.