



John Chaplin
Stroud District Council
Ebley Mill
Ebley Wharf
Stroud
GL5 4UB

By email only to: john.chaplin@stroud.gov.uk

31 October 2022

Dear John,

APPLICATION NO: S.20/0716/FUL

DESCRIPTION: Hybrid planning application for the extension to the existing business park comprising: (i) Outline application for Zones A, D and E (with all matters reserved except access) for employment floor space within Use Classes B1, B2 and B8 and relocated car parking. (ii) Full application for Zones B and C for employment floor space within Use Classes B1, B2 and B8

LOCATION: Aston Down, Cowcombe Lane, Chalford

Thank you for consulting the Cotswolds Conservation Board ('the Board') on the additional information submitted in support of this proposed development, is located within the Cotswolds National Landscape.¹

The additional information comprises an Addendum Planning Statement that has been prepared in response to discussions with Stroud District Council in relation to the requirements of paragraph 177 of the National Planning Policy Framework ('NPPF'). The Council has concluded that the proposals constitute major development within the Cotswolds National Landscape and as such, this Statement sets out the applicant's case for the 'exceptional circumstances' and how the development is within the public interest as required by paragraph 177 to justify permitting 'major development' within the National Landscape.

Paragraph 177 adds that consideration of such applications should include an assessment of: a. the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; b. the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and c. any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

Our previous consultation response, dated 13 July 2020 (appended for ease of reference) considered the application against these requirements (at that time outlined in paragraph 172 of the NPPF) and concluded that the exceptional circumstances did not exist and also the tests had not been adequately considered by the applicant. We also considered that the development was not in the public interest; it is important to note that AONBs are landscapes whose distinctive character and natural beauty are so outstanding that it is in the nation's interest to safeguard them. As such, for the development to be considered to be in the public interest, the potential benefits must outweigh the national significance of conserving and enhancing the natural beauty of the AONB.

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

Having reviewed the applicant's Addendum Planning Statement, their case for 'exceptional circumstances' including the consideration of the three tests within paragraph 177 runs to little more than two pages. The Addendum provides little or no new evidence or analysis over and above that which was included in the original submission. It does not appear to address any of the points raised by the Board in our previous consultation response in respect of the three tests or our view that the proposal would have a significant adverse effect the purposes of designation of the National Landscape.

For the reasons we outlined in our previous response, the Board considers that the proposed development would have a significant adverse effect on the purpose of AONB designation. The development would be contrary to the Cotswolds AONB Landscape Strategy and Guidelines and as such, it would also be contrary to the policies of the Cotswolds AONB Management Plan 2018-2023. In addition, it would be contrary to the policies of the Stroud District Local Plan, including Core Policy CP11 and Delivery Policy ES7.

Accordingly, and in the light of the fact that the Addendum Planning Statement provides no additional justification, we consider that the exceptional circumstances still do not exist to justify the proposed major development and that it would not be in the public interest. Accordingly, we wish **to maintain our objection** to the proposed development.

Please don't hesitate to contact me if you wish to discuss this response further.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S. Joyce', with a small dot at the end.

Simon Joyce
Planning Officer
simon.joyce@cotswoldsaonb.org.uk | 07808 391227

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.

APPENDIX 1 COTSWOLDS NATIONAL LANDSCAPE RESPONSE TO APPLICATION REF. S.20/0716/FUL
DATED 13 JULY 2020

13th July 2020

John Chaplin
Case Officer
Stroud District Council
Ebley Mill
Stroud GL5 4UB

By email only to planning@stroud.gov.uk



Dear John

S.20/0716 – Hybrid planning application for the extension to the existing business park – Aston Down, Cowcombe Lane, Chalford, Gloucestershire GL6 8HR

Thank you for consulting the Cotswolds Conservation Board ('the Board') on the above planning application, for which the proposed development is located in the Cotswolds Area of Outstanding Natural Beauty (AONB).

The Board acknowledges the need to foster the economic and social wellbeing of local communities within the AONB. The Board also acknowledges that Aston Down is identified as Key Employment Site in the Stroud District Local Plan. As such, the Board does not object, in principle, to the creation of new jobs at this site. However, the creation of such jobs should be done in a way that is compatible with the statutory purpose of AONB designation, which is to conserve and enhance the natural beauty of the AONB.

Stroud District Council has already identified, through its Environmental Impact Assessment (EIA) Screening Opinion, that the proposed development *is likely to* have a significant adverse effect on the environment. The Board agrees with this opinion. In particular, as outlined below, the Board considers that the proposed development would have a significant adverse effect on the purpose of AONB designation. Therefore, we object to the proposed development.

Given the likelihood of significant adverse effects, the Board considers that the proposed development should be classed as major development, in the context of paragraph 172 of the National Planning Policy Framework (NPPF). On this basis, the starting point for any planning decision should be a presumption against granting planning permission. Planning permission should only be granted in exceptional circumstances *and* where it can be demonstrated that the development is in the public interest. As outlined below, the Board does not consider that the proposed development meets these requirements.

Impacts on the purpose of AONB designation

Landscape character

The Board considers that the proposed development would have a significant adverse effect on landscape character, as outlined below.

Firstly, the proposed 20% increase in total floor space is very disproportionate to the existing floor space in the business park. This would be contrary to relevant Historic England guidance which states that it is desirable to maintain the scale and density of the original development. This scale of increase would also not compatible with the requirement for the scale and extent of development in the AONB to be limited.

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

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Secondly, the proposed development would undermine the relationship between the historic components of the airfield complex. In particular, the new hangar-size building in the north-east corner of the site would significantly undermine the relationship between the runway section of the airfield complex and the existing, historic hangars. This, in turn, would undermine the historical and cultural significance of the airfield, which is a key feature of the High Wold Dip Slope landscape.

Based on the information outlined above, the development would be contrary to the Cotswolds AONB Landscape Strategy and Guidelines. As such, it would also be contrary to the policies of the Cotswolds AONB Management Plan 2018-2023. In addition, it would be contrary to the policies of the Stroud District Local Plan, including Core Policy CP11 and Delivery Policy ES7.

Visual Impact

The Board acknowledges that the visual effects for receptors at most of the viewpoints identified in the applicant's Landscape and Visual Impact Assessment (LVIA) are likely to be fairly limited. However, we consider that the LVIA significantly underplays the visual effect of the proposed development for receptors at Viewpoint 5, on the airfield access road.

The Board also considers that the LVIA has missed out a particularly significant viewpoint – the airfield control tower, which is also the clubhouse for the gliding. The magnitude of visual effect resulting from the proposed development is likely to be significant (adverse) for visual receptors at this viewpoint.

Transport / Biodiversity

The Board acknowledges that the predicted increase in traffic flows on Cirencester Road is 3.5%. This is considerably lower than the 10% 'rule of thumb' threshold outlined in the Board's Tranquillity Position Statement.

This 'rule of thumb' is based on these increased traffic flows taking place in the sensitive landscape of the Cotswolds AONB. However, the high sensitivity of the Minchinhampton Common and Rodborough Common Sites of Special Scientific Interest (SSSI) to increased traffic flows is an additional important consideration in this regard. Therefore, the Board supports the comments submitted by the National Trust on this issue.

Major development tests

As indicated in paragraph 172 of the NPPF, consideration of major development applications should include an assessment of:

1. the need for the development;
2. the cost of – and scope for – developing outside the AONB or meeting the need in some other way;
3. detrimental effects.

Whilst tests (1) and (3) have clearly been considered in some detail, the applicant has only provided a very superficial consideration to test (2). This level of consideration is certainly not enough to demonstrate that exceptional circumstances apply or that the development would be in the public interest.

When considering whether the development is in the public interest it is important to note that AONBs are landscapes whose distinctive character and natural beauty are so outstanding that it is in the nation's interest to safeguard them. As such, for the development

to be considered to be in the public interest, the potential benefits must outweigh the national significance of conserving and enhancing the natural beauty of the AONB.

Need

The development would clearly provide a significant benefit to the local economy, including 358 net additional jobs, according to the information provided by the applicant.

However, even if there is exceptional need, this does not, in itself, equate to exceptional circumstances. For example, consideration should also be given to tests (2) and (3), outlined above. This should include taking account of the great weight that should be given to conserving and enhancing landscape and scenic beauty in the AONB and the highest status of protection afforded to the AONB in relation to these issues.

The cost of – and scope for – developing outside the AONB or meeting the need in some other way

The information provide in Table 5.1 of the applicant's Planning Statement doesn't actually address the criteria that need to be assessed. For example, it doesn't assess if there are employment sites outside the AONB (either in Stroud District or further afield) where these jobs could be located, or the number of jobs that could potentially be generated on such sites. Nor does it consider or assess a more modest proposal for job creation at Aston Down, based on the principles of (i) maintaining the scale and density of the original development and (ii) conserving and enhancing the natural beauty of the AONB.

Further information relating to these points is provided in Annex 1 below.

If you have any queries regarding the Board's response, please do not hesitate to 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 MRTPI
Planning and Landscape Officer

ANNEX 1. THE CONCERNS OF THE COTSWOLDS CONSERVATION BOARD REGARDING PLANNING APPLICATION S.20/0716/FUL

Landscape and Visual Impact Assessment

LVIA – landscape

The Board acknowledges that the proposals consist of new buildings designed for employment uses, introduced into an area which is already heavily influenced by large scale industrial buildings.

However, as indicated in Stroud District Council's EIA Scoping Report, the proposed development would increase the total floor space of the buildings in the business park by approximately 20%. This is one of the reasons why the District Council considered that the development was likely to have significant adverse environmental impacts and, therefore, one of the reasons why it merited an EIA.

The Board considers this 20% increase to be a significant issue. It is disproportionate to the scale of the existing development in the business park and it is not consistent with the requirement for the scale and extent of development in the AONB to be limited (NPPF, paragraph 172). Furthermore, it is contrary to Historic England's guidance on Historic Military Aviation Sites states that:

- *On sites where coherent groups of historic buildings survive, it is desirable to maintain the scale and density of the original development.*¹

The Cotswolds AONB Landscape Character Assessment identifies that there are 19 different landscape character types (LCTs) within the Cotswolds AONB. The site of the proposed development is located in LCT 9 (High Wold Dip-Slope). This LCT, in turn, is made up of six different Landscape Character Areas (LCAs), of which the relevant LCA, in this instance, is LCA 9D (Cotswold High Wold Dip-Slope).

The applicant's LVIA and Planning Statement indicate that LCA 9D is characterised by large-scale hangars and other buildings. The applicant's inference seems to be that additional large-scale hangar type buildings would not be out of place in this LCA. The Board strongly disagrees with this inference as it is not an accurate interpretation of the Cotswolds AONB Landscape Character Assessment or the Cotswolds AONB Landscape Strategy and Guidelines on which this assertion is based.

These documents state that the relevant key feature / characteristic of LCT 9 (and, therefore, LCA 9D) is, in fact, the (intermittent occurrence of) '*airfields on shallow sloping elevated landscapes*', which '*are evidence of their former strategic role in the defence of Britain in World War II*'. The supporting text in the Cotswolds AONB Landscape Character Assessment states that:

- *A conspicuous feature of the Dip-Slope Lowland landscape is the many airfields and landings strips that are located across it. These range in size from the extensive airfield and barracks on the eastern fringe of Minchinhampton to the single landing strip to the west of Badminton Park. Many military sites were established or greatly expanded during the Second World War ... Many still retain structures associated with their wartime functions such as barracks, hangars and control towers.* [Underlining added for emphasis].

¹ Historic England (2016) *Historic Military Aviation Sites – Conservation Guidance*. Paragraph 5.1.

From this, it is clear that the significance of the existing hangars at Aston Down is their historic association and relationship with the airfield and its role in the defence Britain in World War II. New, hangar-size buildings (such as the one proposed in the north-east corner of the site in Zone B) would not have this historic context and so could not be considered to be an integral component of – or contribute to - this key feature / characteristic. On the contrary, the introduction of such buildings would significantly detract from – and undermine - this key feature / characteristic. In particular, the vast mass, form and scale of the proposed hangar-size building would significantly undermine the characteristic, historic relationship between the existing hangars (and other historic infrastructure) and the airfield.

The Board strongly disagrees with the applicant's assertion that *'the proposed development would be interspersed between existing buildings'*. The majority of the new buildings, including the hangar-sized building in Zone B would, in fact, be located along the eastern boundary of the industrial park, to the east of the existing buildings. Whilst the Board acknowledges that there are some buildings (such as the control tower) on the airfield side, to the east of the proposed development, these are of a much smaller and more dispersed scale and are distinct from the buildings of industrial park.

The Board also strongly disagrees with the assertion that the proposed development would *'fit with existing buildings without obscuring their scale or character'*. As indicated above, locating a new, hangar-sized building in Zone B, between the airfield and the existing hangars, would, in fact, significantly obscure the scale and character of the existing hangars (especially when viewed from the airfield) and weaken the characteristic connectivity.

Whilst the above comments primarily relate to the proposed hangar-size building, the same principles would also apply to the smaller proposed buildings, albeit to a less significant degree.

The Cotswolds Landscape Strategy and Guidelines for Landscape Character Type 7 (High Wold Dip Slope) specifically states:

- *Ensure the historical and cultural significance of the airfield is retained and avoid their erosion through piecemeal development.*²

However, based on the information outlined above, it is clear that the proposed development would, in fact, undermine this historical and cultural significance. As such, it would be contrary to the Cotswolds AONB Landscape Strategy and Guidelines. It would, therefore, also be contrary to Policies CE10 and CE1 of the Cotswolds AONB Management Plan 2018-2023.

In addition, the scale of the proposed development is clearly not sympathetic to, or complementary to, the local landscape character. Nor does it conserve and enhance the natural beauty of the AONB landscape, or adequately take into account historic and cultural heritage. As such, it would also be contrary to the Core Policy CP11 and Delivery Policy ES7 of the Stroud Local Plan, including Core Policy CP11 and Delivery Policy ES7.

These conclusions reflect the findings of the planning inspector in the 2009 planning appeal for the Aston Down site (Appeals Ref: APP/C1625/A/07/2055526 and APP/F1610/A/07/2055089). For example, in paragraph 9.69 of their appeal decision, the planning inspector stated that the proposed external storage and new depot would have *'an adverse effect on the landscape character and appearance of the AONB ... The harm to the AONB and the setting of the buildings could not be overcome by landscaping'*.

² <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/07/lct-9-high-wold-dip-slope-2016.pdf/> (including Section 9.5)

Based on the points outlined above, the Board considers that, in LVIA terms, the sensitivity of the airfield complex (as a key landscape receptor) would be high, the magnitude of landscape effect would both be major and the overall significance of the landscape effect would be major adverse.

LVIA – visual impacts

The Board acknowledges that the visual effects for receptors at most of the identified viewpoints are likely to be fairly limited, with the proposed buildings either not being seen or being seen against a backdrop of the existing buildings in the business park.

The exception to this would be Viewpoint 5 (View from access road to airfield and Cotswolds Gliding Club). The applicant's Assessment of Potential Visual Effects suggests that '*the proposed buildings would not obscure the curved rooflines of the hangars*'. Whilst the 'curved rooflines' might still be seen, the visual prominence of the existing, historic hangars would be significantly reduced. As a result, the characteristic historic, physical and visual relationship between the airfield and the hangars would also be significantly undermined.

On this basis, the Board considers that the 'size and scale of change after construction' would be high, rather than medium. Given the mass, scale and form of the proposed hangar-size building, the Board considers that the proposed native tree and hedgerow planting would do very little to reduce the scale of change over time. Therefore, the Board considers that the 'Magnitude (after 12 years)' would remain high / major (rather than reducing to 'minor').

In addition, the Board considers that the LVIA has omitted an important viewpoint – the control tower of the gliding club. The control tower also forms the gliding club's clubhouse. As such, it is presumably a well-used component of the recreational use of the airfield site. The control tower lies just 50m to the east of the site boundary and within approximately 75m of the proposed hangar-size building in Zone B. This new building would be approximately 150m closer to the control tower than the nearest existing hangar.

It is highly likely that the new hangar-size building would completely block the views from the control tower towards much of the hangar complex on the business park. This would be contrary to Historic England's guidance on Historic Military Aviation Sites, which states that:

- *On sites where coherent groups of historic buildings survive, it is desirable to maintain ... the visual connections between the original buildings.*³

For these reasons, the Board considers that the overall significance of visual effects for receptors at the control tower is likely to be major adverse.

The view from caravan site, immediately to the south west of the control tower and directly adjacent to the control tower, should also be taken into account. The views from the caravan site towards the hangar complex are also likely to be blocked, although the significance of this wouldn't be as high as for the control tower.

Other impacts

Transport / Biodiversity

³ Historic England (2016) *Historic Military Aviation Sites – Conservation Guidance*. Paragraph 5.1.

The applicant has identified that the proposed development would result in a 3.5% increase in traffic flows on Cirencester Road.

The Board's Tranquillity Position Statement identifies a 'rule of thumb' threshold which indicates that traffic flow increases of 10% or more would be significant in the sensitive location of the Cotswolds AONB.⁴

The Board acknowledges that the traffic flow increases identified by the applicant are below this 10% threshold. However, these increased traffic flows would also result in increased levels of traffic at Minchinhampton Common and Rodborough Common Sites of Special Scientific Interest (SSSI), which further increases the sensitivity of this location.

The flower-rich, limestone grasslands of the AONB are one of the AONB's 'special qualities'. In other words, they are key attributes of the area's natural beauty which make the area distinctive and which are valuable at a national scale. As such, any potential adverse effects on these SSSIs resulting from increased traffic flows merits particular attention.

For these reasons, the Board supports the response submitted by the National Trust, which sets out the potential implications of increased traffic flows for Minchinhampton and Rodborough Commons (including the road verges) and which makes a number of recommendations, including:

- *We would ask the councils to ensure they have sufficient information on the potential impacts of the proposed development on the Stroud Commons; and to fully assess the implications for their ecological interests. If the councils are minded to accept the principle of the proposed development – consideration should be given to what necessary additional mitigation measures are required to ensure that adverse impacts are avoided, or that any such impacts are controlled and kept to an absolute minimum.*

If the proposed development is granted planning permission, the applicant should be required to deliver significant net-gains for biodiversity. Given the scale of the proposed development (i.e. 20% increase in floor space), the required net gain in biodiversity should be equally significant.

Lighting

The potential light pollution associated with the proposed development is an important consideration with regards to the AONB. This is because light pollution has the potential to adversely affect the dark skies of the AONB, which are one of the AONB's 'special qualities',

The applicant's Environmental Statement – Landscape (para 5.6.3) states that external lighting would be directed downwards and kept to a minimum to reduce the potential for light pollution and disruption to ecology. The Board acknowledges and supports these proposed measures, as minimising and avoiding light pollution would be consistent with Policy CE5 (Dark Skies) of the Cotswold AONB Management Plan 2018-2023.

However, the applicant should be required to undertake an assessment of light pollution levels, both for the current baseline and for the proposed development. This assessment should compare the light pollution levels with the obtrusive light limitations identified in Table

⁴ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2019/06/Tranquillity-Position-Statement-FINAL-June-2019.pdf> - Section 4.5.

2 of the 'Guidance Notes for the Reduction of Obtrusive Light', published by the Institution of Lighting Professionals.⁵

In addition to minimising new sources of light pollution, the applicant should also be required to demonstrate how the existing sources of light pollution would be removed or reduced, in line with Policy CE5 of the Cotswolds AONB Management Plan 2018-2023.

If planning permission is granted, planning conditions should be imposed to ensure that the proposed development is compatible with the Board's Position Statement on Dark Skies and Artificial Light.⁶ This should include external lighting only being permitted during set hours (for example, 7am to 7pm).

⁵ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2019/03/Dark-Skies-Artificial-Light-Appendix-B-ILP-Guidance-Notes-For-the-reduction-of-Obtrusive-Light.pdf>. The appropriate 'Environmental Zone' would be Zone E1.

⁶