



Joe Brooke
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By email only to: joe.brooke@stratford-dc.gov.uk

7 June 2022

Dear Joe,

APPLICATION NO: 22/00981/FUL

DESCRIPTION: Re-configuration of the existing car parking and vehicular access arrangements, including the re-location of the main access to the site; re-configuration of the visitor spaces and paths through the site, including the creation of a herb garden and minor earthworks to screen the carpark; creation of a pond, marsh and wetlands; diversion of footpath SS76B; change of use of land from equestrian paddocks to land used in association with the distillery and all associated landscaping and biodiversity works.

LOCATION: Whichford Road, Phillips Field Whichford Road Stourton CV36 5EX.

Thank you for consulting the Cotswolds Conservation Board ('the Board') on this proposed development, which would be located within the Cotswolds National Landscape.¹

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.² 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) take into account the following Board publications³:

- Cotswolds Area of Outstanding Natural Beauty (AONB) Management Plan 2018-2023 ([link](#));
- Cotswolds AONB Landscape Character Assessment ([link](#)) particularly, in this instance, with regards to Landscape Character Type (LCT) 19 (Unwooded Vale) which the site is located within and 1 (Escarpment Outliers) and 6 (Ironstone Hills and Valleys) from which the site can be viewed;
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)) particularly, in this instance, with regards to LCT 19 ([link](#)), including Section 19.1, LCT 1 ([link](#)) including Section 1.1 and LCT 6 ([link](#));
- Cotswolds AONB Local Distinctiveness and Landscape Change ([link](#)); and
- Cotswolds Conservation Board Position Statements ([link](#)) particularly in this instance with regards to Dark Skies and Artificial Light Position Statement ([link](#)) and its appendices ([link 1](#), [link 2 now updated in 2021](#), [link 3](#)); and Tranquillity Position Statement ([link](#)).

Having reviewed the application, we consider that the proposal would not result in a significant impact on the landscape and scenic beauty of the National Landscape. Consequently, whilst the Board **does not wish to object** to this application, we would request that the applicant provides some further consideration to some of the matters outlined in Annex 1 below.

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

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 be 'S. Joyce', written on a light-colored background.

Simon Joyce

Planning Officer

simon.joyce@cotswoldsaonb.org.uk | 07808 391227

ANNEX 1: RESPONSE OF COTSWOLDS NATIONAL LANDSCAPE TO APPLICATION NO. 22/00981/FUL, 7 JUNE 2022

Whilst the site is relatively large, in excess of 4ha, the land north of the hedgerow lies within the current curtilage of the distillery and the changes proposed here are essentially a reconfiguration of a previously approved scheme. The southern parcel of land, currently sub-divided into paddocks for grazing by horses is relatively enclosed and well screened by the boundary hedgerows and trees which would mostly be retained and supplemented by further planting.

The Cotswolds AONB Landscape Strategy and Guidelines ('LS&G') for the Landscape Character Type within which the site is situated, the Unwooded Vale, describes how *"even in rural areas the screening effects of landform, farm woodlands, hedgerows and shelterbelts provide a framework in which some opportunities for small-scale development exist"*.

We agree with the conclusions of the applicant's Landscape and Visual Appraisal that the southern parcel of land currently used as paddocks contributes little to the AONB and in its current state does not reflect the local landscape character. The proposal will also not result in the addition of any new major vertical elements to the site (aside from tree planting) which would be visible in longer views whilst from closer viewpoints the development is likely to be experienced in the context of the current distillery operation and the neighbouring Marsh Farm and Cotswolds Ironworks to the south.

The proposal would, on balance, not create an adverse impact upon the purposes for which the area was designated an Area of Outstanding Natural Beauty and we consider that the proposal broadly accords with Policy CS.11 of the Stratford-on-Avon Core Strategy and Policy CE1 of the Cotswolds AONB Management Plan.

However, section 19.24 of the LS&G advises that *"woodland creation is not appropriate in this landscape type to retain the open un-wooded character. The exception is tree planting in association with new development"*. Accordingly, whilst we consider the proposed planting within the current site would be appropriate as part of the development, we would advise that the amount of 'spot planting' of trees in the southern parcel should be reduced as it would appear out of character within a local landscape which predominantly comprises relatively large, open fields. We would recommend that native planting should comprise pedunculate oak, lime, hawthorn and hazel.

We agree that the proposed changes to the access would result in a reduction in possible conflicts between pedestrians and commercial vehicles within the site. We also note that the application will result in a likely reduction in HGV traffic to and from the site (due to the 'white water' distilling by-products being treated on site rather than being collected), which we also support, and that visitor parking and trips are unlikely to significantly increase.

We note the comments received from the Council's Rights of Way team and Warwickshire Ramblers regarding the proposed diversion of footpath SS76d. We agree with the Ramblers' view that the proposed enclosure of the diverted footpath should be reconsidered to avoid it being enclosed by hedgerows on both sides which may lead to its deterioration, particularly during winter months.

No details of external lighting have been provided, particularly in relation to the car park and access road. Any lighting in this location would introduce a 'lit element' into what would otherwise be a relatively dark night-time landscape and these dark skies are one of the 'special qualities' of the Cotswolds National Landscape. The Cotswolds AONB Landscape Strategy & Guidelines for LCT 2

(Section 2.2) identifies 'the introduction of lit elements to characteristically dark landscapes' as a potential (adverse) implication for isolated development such as this. Policy CS.11 of the Core Strategy states that the minimisation of light pollution within the National Landscape is a priority and Policy CE5 (Dark Skies) of the AONB Management Plan advises 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.

The Board's Dark Skies and Artificial Light Position Statement and its appendices provides further guidance on this matter and we would request that should lighting be proposed, any lighting scheme should be subject to a pre-commencement condition to protect the ecological value of the site as well as the requirement to avoid and minimise light pollution in the AONB.

We would also ask for clarification as to where the ecological water treatment reedbed will discharge to and whether any potential pollution risk has been considered. The Planning Statement mentions a Flood Risk Assessment has been undertaken, however there does not appear to be such a document on the planning register at present.

Finally, we would ask for clarification on how the spoil resulting from the excavation of the ponds and reedbeds will be dealt with and how large the proposed bunds will be in the northern section of the site.

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.
www.legislation.gov.uk/ukpga/2000/37/section/85
- 3) The documents referred to in our response can be located on the Cotswolds National Landscape website under the following sections
 - a. Cotswolds Area of Outstanding Natural Beauty (AONB) Management Plan 2018-2023
www.cotswoldsaonb.org.uk/management-plan
 - b. Cotswolds AONB Landscape Character Assessment
www.cotswoldsaonb.org.uk/lca
 - c. Cotswolds AONB Landscape Strategy and Guidelines
www.cotswoldsaonb.org.uk/lsg
 - d. Cotswolds AONB Local Distinctiveness and Landscape Change
www.cotswoldsaonb.org.uk/ldlc
 - e. Cotswolds Conservation Board Position Statements
www.cotswoldsaonb.org.uk/ps1
www.cotswoldsaonb.org.uk/ps2