



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

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

14 February 2022

Dear John,

APPLICATION NO: S.21/2579/OUT

DESCRIPTION: Hybrid planning application for employment development for B8 (Storage or Distribution) Uses, ancillary offices, energy centre, landscaping, fitness trail and amenity areas and new access. i) Outline for whole site (with all matters reserved except access) ii) Full application for Units 1, 2 for B8 (Storage or Distribution) Uses and the energy centre (all matters submitted).

LOCATION: Javelin Park, Bath Road, Haresfield, Stonehouse

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

The Board recognises that the application site benefits from a draft allocation for B2 and B8 employment uses in the emerging Stroud Local Plan Review which is currently at examination stage. The Board also supports appropriate economic growth to maintain strong, balanced and viable communities and therefore the need to accommodate such growth, when it is delivered in a way that is compatible with the purpose of conserving and enhancing the natural beauty of the Cotswolds National Landscape.

However, after having reviewed the information submitted by the applicant, the Board **objects** to this application due to the likely adverse landscape and visual impacts of the proposal, especially on the views to, and in particular, from the Cotswold escarpment, which are one of the 'special qualities' of the Cotswolds National Landscape, those being the features of the AONB that makes the area so outstanding that it is in the nation's interest to safeguard it.

The Board considers that the proposed development has the potential to create significant adverse landscape and visual impacts on views from Haresfield Beacon and associated sections of the Cotswolds Way National Trail. It is our view that, by virtue of their prominent location and excessively large size which lacks justification (especially when compared with other recently consented development at St Modwen Park), the proposed warehouses and associated development are not sensitively located and designed so as to avoid or minimise their impact on the AONB, in conflict with Policies ES7, CP14 and CP11 of the Stroud Local Plan 2015 and paragraph 176 of the NPPF as well as the advice contained in Policy CE1 of the Cotswolds AONB Management Plan 2018-2023.

Cotswolds Conservation Board

The Old Prison, Fosse Way, Northleach
Gloucestershire GL54 3JH
01451 862000
info@cotswoldsaonb.org.uk

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

Furthermore, the Board considers that the application as a whole seeks to downplay this potential significant adverse impact on the National Landscape; further information relating to our objection can be found in the Annex accompanying this response.

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

ANNEX 1. COTSWOLDS NATIONAL LANDSCAPE CONSULTATION RESPONSE IN RELATION TO PLANNING APPLICATION S.21/2579/OUT

Planning Policy Considerations

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 publications:

- 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 Types (LCT) 18 (Settled Unwooded Vale), 2 (Escarpment) and 8 (High Wold Valley);
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)) particularly, in this instance, regards to LCT 18 ([link](#)), including Section 18.1, LCT 2 ([link](#)) including Section 2.1 and LCT 8 ([link](#)) including Section 8.1;
- Cotswolds AONB Local Distinctiveness and Landscape Change ([link](#));
- Cotswolds Conservation Board Position Statements ([link](#)) particularly, in this instance, with regards to Development in the Setting of the AONB ([link](#)), Landscape-Led Development ([link](#)), Tranquillity ([link](#)) and Dark Skies and Artificial Light ([link](#)) and its appendices ([link 1](#), [link 2](#), [link 3](#)).

National Planning Policy Framework (July 2021) and development within the setting of the Cotswolds National Landscape

Paragraphs 174 and 176 of the National Planning Policy Framework provide the highest status of protection for the landscape and scenic beauty of AONBs, including the Cotswolds National Landscape. Paragraph 174 states that planning decisions should both contribute to and enhance the natural environment by protecting and enhancing valued landscapes in a manner commensurate with their statutory status or identified quality in the development plan.

Paragraph 176 then outlines the ‘great weight’ to be given to the conservation and enhancement of the landscape and scenic beauty of AONBs. This ‘great weight’ is relevant in this instance as the site forms part of the AONB’s setting and the proposed development would, in the view of the Board, have a significant adverse impact on its landscape and visual character and quality.

Furthermore, the requirement that development within the setting of AONBs “*should be sensitively located and designed to avoid and minimise adverse impacts on the designated areas*” was also added into paragraph 176 with the publication of the current NPPF in July 2021.

Given the Landscape chapter of the applicant’s Environmental Statement (Chapter 9, Rubicon Planning/EDP, October 2021) and the Landscape and Visual Baseline (EDP, July 2021) both state that the site lies within the setting of the Cotswolds National Landscape, it is disappointing that whilst the Environmental Statement, Landscape and Visual Baseline and Planning Statement (Rubicon Planning, October 2021) all refer to the Framework’s presumption in favour of sustainable development, none

of these documents adequately reference its provision for landscape protection; none of these documents make any mention of NPPF paragraph 176.

The fact that this key paragraph of national planning policy relating to AONBs and the 'great weight' required to be given to their protection is omitted from the submission leads the Board to consider that the applicant downplays the status of the AONB and, by extension, the proposal's likely significant adverse impacts upon it. Any adverse effects on the AONB need to be assessed properly and fully taken into account when determining this application, with the appropriate weighting applied in the decision.

The Board's Position Statement on Development in the Setting of the AONB referred to above outlines how the surroundings of the Cotswolds National Landscape are also important to its landscape character and quality. Development proposals that affect views into and out of the AONB need to be carefully assessed to ensure that they conserve and enhance the natural beauty and landscape character of the AONB.

The National Planning Policy Guidance (NPPG 2014) also confirms in relation to the Section 85 duty² that *"The duty is relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which might have an impact on the setting of, and implementation of, the statutory purposes of these protected areas."*

A High Court decision (Stroud District Council v Secretary of State for Communities and Local Government (Gladman Development Ltd) February 2015) helps confirm the application of what is now paragraph 176 of the NPPF as far as 'great weight' is concerned. Mr Justice Ouseley stated in this case that paragraph 115 (now paragraph 176) of the NPPF *"certainly covers the impact on the scenic beauty of the land actually within the AONB. It seems to me that it would be unduly restrictive to say that it could not cover the impact of land viewed in conjunction with the AONB from the AONB. But to go so far as to say that it must also cover land from which the AONB can be seen and great weight must be given to the conservation of beauty in the AONB by reference to that impact reads too much into paragraph 115."*

The above decision helps to clarify that there are differing ways of assessing impacts on the setting of the AONB which require the application of different policies and guidance: (i) harm directly to land in the designated AONB itself from views out of the AONB and between parts of the AONB towards new development in its setting (where Paragraph 176 of the NPPF is relevant) and: (ii) as a separate material consideration, harm to land outside the designated AONB, for example views of new development in the context or backdrop of the AONB (where paragraphs 176 or 177 is not relevant).

Impact of views back towards the AONB, from outside the AONB, may be a separate material consideration and subject to separate policy and guidance, for example paragraph 174 of the NPPF also states that planning decisions should contribute to and enhance the natural environment by protecting and enhancing valued landscapes in a manner commensurate with their statutory status or identified quality in the development plan.

This approach is supported by recent appeal decisions. In considering an appeal at Ashmead Drive, Gotherington (Tewkesbury District, appeal ref. APP/G1630/W/20/3256319) the Inspector states at

paragraph 28 of her decision letter that *“Having regard to case law presented, along with the Planning Practice Guidance, in my view, although the proposal is outside the AONB, the effect on views out of the AONB, gained from within the AONB would result in paragraph 172 [now paragraph 176] being relevant”*. This approach was also taken in an appeal decision issued last month where the Inspector refused an employment proposal featuring buildings of around 12m in height located within the setting of the North Wessex Downs AONB (appeal ref. APP/U3935/W/21/3269667, Inlands Farm, Swindon, 24 January 2022, paragraph 21).

Adopted Development Plan

As far as adopted Development Plan policy relating to landscape issues is concerned, Stroud District Local Plan (2015) Delivery Policy ES7 ‘Landscape character’ refers to development on land that may affect the AONB’s setting and states that priority will be given to the conservation and enhancement of the natural and scenic beauty of the landscape whilst taking account of the biodiversity interest and the historic and cultural heritage. Major development will not be permitted unless it is demonstrated to be in the national interest and that there is a lack of alternative sustainable development sites.

Policy CP14 ‘High quality sustainable development’ refers to the need for ‘appropriate design and appearance’ and ‘integration with surroundings’ in sub sections 5 and 9 respectively whilst Policy CP11 ‘New employment development’ describes how development should ‘be of a type and scale of activity that does not harm the character, appearance or environment of the site or its surroundings...’.

Emerging Development Plan

The Board recognises that the application site benefits from a draft allocation in the emerging Stroud Local Plan Review (Presubmission Draft Plan 2021). Employment allocation reference PS43 Javelin Park allocates 27 hectares of land for ‘office, B2 and B8 employment uses’. The supporting text at paragraph 3.4.13 of the Presubmission Draft Plan states that the development *“will need to include a high quality of design and landscaping that minimises any potential visual impacts upon the heritage assets and their immediate settings at adjacent Haresfield and wider views from the Cotswolds AONB escarpment”*. It is also noted that the Presubmission Draft Plan also proposes a further 5ha employment allocation as an extension to the Quedgeley East (now called St Modwen Park) development as well as significant new residential development at Hunts Grove.

The emerging policy framework for the application site states that *“a masterplan, to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and coordinated manner”*. Whilst the Board is unclear whether or not this application represents the Local Plan level ‘masterplan’ envisaged by the Council, we would recommend that a close analysis of building heights, siting, layout and massing are key considerations, along with landscape mitigation to minimise the visual impacts of any development on the special qualities of the AONB.

Draft Delivery Policy ES7 concerns landscape character and states that *“Within the Cotswolds Area of Outstanding Natural Beauty (AONB), or on land that may affect its setting, priority will be given to the*

conservation and enhancement of the natural and special qualities of the AONB, including landscape quality / landscape beauty, tranquillity; dark skies; natural heritage and cultural heritage. Proposals that are likely to impact on, or create change in, the landscape of the Cotswolds AONB should have regard to, be compatible with and reinforce the landscape character of the location. Major development will not be permitted unless it is demonstrated to be in the national interest and that there is a lack of alternative sustainable development sites." (our emphasis). The policy further states that in all locations development proposals should conserve or enhance the special features and diversity of the different landscape character types found within the District. Priority will be given to the protection of the quality and diversity of the landscape character for its own intrinsic beauty and for its benefit to economic, environmental and social wellbeing and development will only be permitted if it will protect and enhance landscape character.

Cotswolds AONB Management Plan

The Cotswolds AONB Management Plan 2018-2023, which is a material consideration in planning decision making, identifies the Cotswold escarpment and high wolds, including views from and to the AONB, as being two of the AONB's 'special qualities' along with the tranquillity of the area and its dark skies. The special qualities of the AONB are those aspects of the area's natural beauty which make the area distinctive and which are valuable, especially at a national level. They are also the key attributes on which the priorities for the AONB's conservation, enhancement and management should be based.

Policy CE1 states that proposals that are likely to impact on, or create change in, the landscape of the Cotswolds AONB, should have regard to, be compatible with and reinforce the landscape character of the location, as described by the Cotswolds Conservation Board's Landscape Character Assessment and Landscape Strategy and Guidelines. They should have regard to the scenic quality of the location and its setting and ensure that views – including those into and out of the AONB – and visual amenity are conserved and enhanced.

The Board's Tranquillity Position Statement referenced above recommends that proposals that have the potential to impact on the tranquillity of the AONB accord with Policy CE4 of the Cotswolds AONB Management Plan 2018-2023, give great weight to conserving and enhancing the tranquillity of the AONB and assess potential impacts on tranquillity, particularly with regards to noise, vehicle movements and landscape and visual impacts.

Policy CE5 states that proposals that are likely to impact on the dark skies of the AONB should have regard to these dark skies, by seeking to (i) avoid and (ii) minimise light pollution.

LANDSCAPE AND VISUAL IMPACTS

Notwithstanding the hybrid nature of the scheme and in line with the approach taken by the Inspector in the Inlands Farm appeal referred to above, we have considered the proposal, both detailed and outline elements, as a whole. The submitted Parameters Plan (dwg. no. 6440 - 67 Rev C) demarcates a development area to be built out with an overall floor area of up to 105,000 sqm with a maximum height of 57.30m A.O.D. excluding plant, silos or other ancillary structures. 57.30m A.O.D. indicates that the warehouses will themselves reach a maximum height of 34m.

The site is visible from multiple viewpoints within the AONB from Public Rights of Way, access land and local roads, including Haresfield Beacon, a popular viewpoint for both tourists and local residents. These Public Rights of Way include the nationally significant Cotswold Way National Trail which passes Haresfield Beacon and continues along the escarpment, where clear views over the site and the Berkeley Vale can be enjoyed. Indeed, the applicant's submission underestimates the full extent of the area from which the proposal will likely be visible. The screenshot below is taken from an LVIA prepared in support of an application at Ebley, near Stroud (GCC appn. ref. 21/0075/STMAJW) and shows a view taken from Selsley Common, 7km from the Symmetry Park application site. The Javelin Park EFW plant is clearly visible and given the scale of the proposed warehouses, it is likely that they would also be visible.



Extract taken from LVIA prepared in support of GCC appn. ref. 21/0075/STMAJW (ACL Landscape Architects/Dalcour Maclaren, August 2021)

The Board acknowledges the applicant's assertion that the proposal, when viewed from the Cotswolds escarpment, would to some extent be viewed as part of a wider panorama and adjacent to the Javelin Park EFW facility. The Board also agrees with the application's assessment that both the National Landscape as a landscape receptor and receptors on the Cotswold Way National Trail should be classed as having 'very high' sensitivity in line with the criteria included at Tables 9.1 and 9.2 of the Environmental Statement.

The Environmental Statement's landscape chapter (Chapter 9) proceeds to conclude that due to the 'low' magnitude of change, the impact of the proposal on views (visual effects) from Haresfield Beacon and the associated section of the Cotswold Way National Trail (shown at photoviewpoints 4 and 10) would be 'moderate and significant' adverse both at years 1 and 15, despite the landscape mitigation proposed. It also states that paragraph 3.25 of Technical Appendix 9.1, Landscape and Visual Baseline that there would also be significant landscape effects on LCT 2C Uley to Cooper's Hill ('Escarpment'). In the Board's view, the magnitude of change is at least 'low'. Using the Level of Effects Matrix at Table 9.5 of the ES, a 'medium' or 'medium to low' magnitude of change coupled with the 'very high' sensitivity observed would result in a 'major-moderate' adverse impact for both landscape and visual receptors.

However, the Planning Statement makes no mention of these conclusions or indeed of any assessed impacts on the National Landscape, merely concluding in its Executive Summary that *"the site itself has no heritage or landscape value and with the use of good design and choice of colour and types of materials can be assimilated into the wider landscape"*. Moreover, whilst paragraph 3.12 of the Planning Statement states that *"The EIA and other supporting documents examine the environmental impact of the proposal and conclude no harm will arise"*, as outlined above, at no point does the report even mention the AONB designation the setting of which the application site lies within.

The Board also notes Natural England's further observations in its objection, dated 2 February 2022, referenced i) to iii) in its consultation response. Having been informed by a site visit by the Board's Planning Officer on 1 December 2021 in mostly overcast weather but with good visibility, we agree with Natural England on these matters and also on its observations relating to materials and colour selection.

Moreover, whilst the application only considers that one Landscape Character Type, LCT2 (Escarpment), would be impacted by the proposal, in our view it has the potential to impact three separate LCTs. Sections of the Cotswold Way, for example, are on the boundary between LCT2 and LCT8 (High Wold Valley); the long-distance views associated with the high wold are another of the relevant 'special qualities' of the AONB. The proposed development would also be highly visible from a number of publicly accessible locations within LCT 18 including Public Rights of Way to the east of Haresfield and south of Colethrop.

The application also seems to imply that only a small part of the LCT2 would be affected and that therefore the scale and potential impact of the proposed development are not significant. The Board's position is that it is not appropriate to compare the extent of the effect with the size of the whole LCT in an attempt to downplay its potential impact, as taking this approach would completely undermine the national planning policies that are put in place to protect, conserve and enhance the

natural beauty of AONBs. This position is expanded upon in Appendix 2 of the Board's Landscape-Led Development Position Statement, referenced above.

Chapter 9 of the Environmental Statement also does not adequately address the cumulative effects of the development as multiple viewpoints, both in terms of views from the AONB and views towards the AONB, are likely to be adversely affected by multiple developments; this development and those allocated in the emerging Stroud Local Plan Review.

In conclusion on landscape and visual matters, we support Natural England's view that the 'moderate and significant adverse' landscape impact assessment at years 1 and 15 made by the applicant downplays the potential impact of the proposal. Our view is that the proposal would have a likely 'moderate/major and significant adverse' impact on views from Haresfield Beacon and the Cotswold Way.

SCALE AND BUILDING HEIGHTS

Whilst the Board recognises the nationwide need for well-located logistics sites, we are concerned that, apart from mention of a 34m height 'limit' in relation to the decision allowing the Javelin Park EFW proposal (in reference to the requirements of the Gloucestershire Waste Core Strategy rather than the Stroud Local Plan), there appears to be no clear justification for the size of the warehouses. This is relevant both in terms of the overall floorspace, proposed either in outline or detail, which is in excess of 1.1 million sqft (105,000 sqm) and particularly so for the 34m height parameter the applicant is seeking to establish for the phase 2 buildings.

The two phase 1 units for which detailed consent is sought extend to 172,330 sqft and 259,916 sqft respectively, significantly larger than those consented at St Modwen Park, whilst the phase 2 units are shown to be larger still.

The Gloucestershire Employment Needs Assessment ('ENA', SPRU, August 2020), which forms part of the Council's Local Plan Review evidence base, notes in its conclusion on location and mix at paragraph 12.17 that *"in terms of size requirements, there is an identified shortage of medium size units in the 25,000-40,000 sqft range and there is a steady demand for smaller units of around 1,000-5,000 sqft... This means the demand for employment land will be to include smaller sites at the existing employment locations, close to the motorway junctions or strategic road network, and close to the existing workforce"* (our emphasis). There is no mention of a particular local need for such large warehouses.

Indeed, the applicant's own Planning Statement at paragraph 3.47 and 4.21 outlines how the ENA states that only 12.8 ha of B8 use is required in Stroud District to 2040 (in comparison to the site's 27ha size) and that the greatest need for new employment development in the District is for new B1c/B2 class facilities, rather than the B8 use proposed here. Whilst paragraph 4.18 of the Planning Statement outlines a 65ha shortfall in employment land supply from within the Gloucester, Tewkesbury and Cheltenham Joint Core Strategy authorities which Stroud District has committed to help accommodate, there is no mention of what proportion of this would be for B8 use as opposed to other B-class employment uses. Paragraph 4.22 of the Planning Statement also identifies that *"Local Plan Review policy CP2 does not provide for cross boundary employment land need"*. In short, whilst

the site is identified as a proposed allocation for employment uses, there appears to be no current specific policy requirement for over one million square feet of B8-class warehouse floorspace, in buildings of up to 34m tall in this location.

The Board also notes that two of the now built out units at St Modwen Park, the strategic scale B8 development to the northeast of the site and formerly known as Quedgeley Trading Estate where units range from 36,576 to 73,000 sqft, are unoccupied (<https://stmodwenlogistics.co.uk/property/st-modwen-park-gloucester/>, as at 10/2/22) with more as-yet unreserved units on the remainder of the site being offered on a 'build to suit' basis.

St Modwen Park features buildings for which the maximum permitted building heights range between 13m and 19m. These height limits were imposed to reduce their impact on the setting of the AONB and nearby heritage assets. The 34m high phase 2 buildings proposed in this application are therefore 88% taller than both the phase 1 units and those consented at St Modwen Park. Whilst the applicant points to the neighbouring presence of the Javelin Park EFW plant, this structure was not intended to set a precedent for other buildings on the rural fringe of Gloucester, particularly when in the setting of the National Landscape and in our view, the landscape mitigation proposed in terms of tree planting around the site boundaries would provide little to no mitigation of the significant new buildings in elevated views from the Cotswold escarpment.

The scale of the development including the size, bulk, massing and height of the structures represents a key consideration in this application, yet parts of the submission lack clarity in helping to differentiate between the full and outline elements of the proposal. Clarification regarding the content of the photomontages is required as those submitted by the applicant clearly show all the proposed buildings at c.34m in height, an example being dwg. ref. edp5060_d064, Figure 9.10, verified view 4 at 15 years.

HIGHWAYS IMPACTS

Tranquillity is another of the 'special qualities' of the Cotswolds National Landscape. In other words, it is one of the features of the Cotswolds that makes the area so outstanding that it is in the nation's interest to safeguard it. The Cotswolds National Landscape has relatively high levels of tranquillity, especially when compared with the surrounding urban areas.

The key environmental effects in respect of transport are identified in para 5.4 of the Transport Assessment as (i) increased delay on the network and (ii) visual impacts from additional traffic. Whilst the Board recognises that most, if not all, of the delay on the network will likely be on routes outside of the National Landscape, the visual impact of the traffic, particularly increased numbers of OGVs associated with the proposal, is likely to be a factor when viewed from the National Landscape. However, the Environmental Statement submitted in support of the application fails to consider the potential impact of traffic generated by the development on the AONB and its tranquillity or the cumulative impact of this and the other developments consented nearby.

It is also noted that National Highways, Helix Transport Consultants (on behalf of Standish Parish Council) and Turley (on behalf of St Modwen, the developer of St Modwen Park), have all raised issues around the impact of the proposal on the continued safe operation of the local and strategic road

network. This includes the existing highways capacity and 'pinch points' at key junctions in proximity to the application site, the deliverability of off-site highways improvements required to unlock the site for development and shortcomings within the Transport Assessment which Turley and Helix consider is based upon outdated and incomplete data. The Board supports the concerns raised and agrees that this proposal has the potential to cause significant disruption to the strategic and local highway network, both during its construction and operation of development and that this may adversely impact the AONB in terms of tranquillity and visual amenity.

LIGHTING

Whilst a Lighting Statement (Hannan Associates, July 2021) has been submitted in support of the application, it does not mention potential landscape or dark skies impacts in relation to the AONB and the applicant is requested to provide further clarification on their proposal to allow the Board to further consider this issue. Dark skies are another of the 'special qualities' of the AONB and the applicant is encouraged to refer to the Board's guidance in relation to artificial light and dark skies contained in our Position Statement referred to above.

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