



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

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

5 April 2022

Dear John,

APPLICATION NO: S.22/0206/OUT

DESCRIPTION: Proposed Eco-Park development comprising a 5,000 capacity football stadium, indoor and outdoor playing pitches, an Academy building, up to 37,700 sq.metres of Class E offices and 18,000 sq. metres of B2/B8 employment floorspace with up to 2,750 sq. metres of ancillary Class E food/retail/creche, a hotel with up to 100 beds, a Care Village including a 70 bed Care Home, as well as associated access, parking, landscaping and other ancillary works. Outline with access details submitted

LOCATION: Land At M5 Junction 13 West Of Stonehouse, Eastington, Gloucestershire

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

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 Types (LCT) 18 (Settled Unwooded Vale) and 2 (Escarpment);
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)) particularly, in this instance, regards to LCT 18 ([link](#)), including Section 18.1 and LCT 2 ([link](#)) including Section 2.1;
- 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](#)), and Dark Skies and Artificial Light ([link](#)) and its appendices ([link 1](#), [link 2](#), [link 3](#)).

We note that the site is allocated in the emerging Stroud Local Plan Review, which has now been submitted for examination. M5 Junction 13 Eco Park is allocated as Strategic Site PS20 for a strategic mixed-use development, including employment, sports stadium, sports pitches, 70-bed care village, hotel, canal and open space uses.

Whilst the site forms part of the setting of the Cotswolds National Landscape, it lies some distance from its boundary, the nearest point being identified by the applicant as Doverow Hill, over 2km from

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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

the site. The Cotswold escarpment, the views to and from which comprise one of the 'special qualities' of the National Landscape, lies further east, around 3km from the site's eastern boundary.

The landscape and visual chapter of the Environmental Statement identifies representative viewpoints that have been agreed between the applicant and the Council, including views from the Cotswold Way National Trail at Haresfield Beacon (c.5km northeast, photoviewpoint 10), south of Standish Woods at Maiden Hill (c.4km east, photoviewpoint 9) and at Selsey Common (c.5.3km southeast, photoviewpoint 11). A further viewpoint is identified on the footpath at Doverow Hill (photoviewpoint 15). The applicant has provided wireframes of the development at Years 1 and 15 from photoviewpoints 9 and 15. The Environmental Statement also considers lighting at Chapter 13.

Given the site's location, the proposed development would be viewed in the context of the intervening development between it and the National Landscape, including the town of Stonehouse, the industrial and commercial development at Oldends and the committed development site at Great Oldbury. The Environmental Statement identifies a low to negligible magnitude change to the character of the National Landscape, resulting in a minor/negligible effect in the longer term. It also identifies a low to negligible magnitude of change in views from the identified viewpoints within the National Landscape. These would reduce to negligible by Year 15. This magnitude of change coupled with the high sensitivity of receptors on the Cotswold Way and the National Trust/commons and access land would result in minor adverse visual impacts at Year 1, reducing to minor/negligible adverse at Year 15.

Having considered the information provided by the applicant, the Board agrees that the proposed development is unlikely to create any significant adverse landscape or visual effects upon the setting of the Cotswolds National Landscape or its special qualities, including the escarpment, the high wold and its tranquillity.

As such, the Board **does not object** to this application. Without prejudice, should the Council be minded to grant planning permission, we would recommend that the Council satisfies itself that the impact of any lighting, including floodlighting for the stadium and training pitches, is minimised and imposes appropriately worded planning condition(s) to ensure that a detailed lighting design strategy is submitted for the Council's consideration as part of any reserved matters application in the interests of minimising the impact of 'sky glow' from the development upon the tranquillity of the National Landscape. It is recommended that the applicant refers to the Board's Dark Skies and Artificial Light Position Statement and its appendices, referenced above. Please don't hesitate to contact me if you wish to discuss this response further.

Yours sincerely,



Simon Joyce

Planning Officer

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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.
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