

Planning application Ref: S.14/0673/FUL

Proposal: Proposed construction of a 1.5MW on-farm Anaerobic Digester (AD) plant on land adjacent to the agricultural development formerly known as Chavenage Dairy

Location: The Old Dairy Chavenage, Tetbury, Gloucestershire, GL8 8XU

Comments of the Cotswolds Conservation Board

1. The Cotswolds Conservation Board ('the Board') was established by Parliament in 2004.

The Board has two statutory purposes¹:

- a) to conserve and enhance the natural beauty of the Area of Outstanding Natural Beauty (AONB); and
- b) To increase the understanding and enjoyment of the special qualities of the AONB.

In fulfilling these roles, the Board has a duty to seek to foster the economic and social well-being of people living in the AONB.

2. Planning Practice Guidance issued by the Government in March 2014 states:

National Parks and Areas of Outstanding Natural Beauty management plans may also be material considerations in making decisions on individual planning applications, where they raise relevant issues.

The Cotswolds AONB Management Plan 2013-18 includes the policy:

NRP2: *Carbon emissions within the AONB are reduced by reducing energy consumption, applying energy conservation measures, encouraging more sustainable patterns of development, and utilising renewable energy generation technologies that are of an appropriate type and scale for their siting.*

2. To amplify the Management Plan policy the Board has issued a Position Statement on renewable energy generation in the Cotswolds AONB². This includes the guidance that:

- Bioenergy would be welcome for its contribution to farm diversification. However the siting of a large scale facility may be difficult. Small to medium scale community projects are encouraged, in particular where they generate heat.
- Biofuels schemes are welcomed in principle provided care is taken to ensure that the scale of the processing site including traffic flows is consistent with the landscape character and tranquility and that agricultural monoculture is avoided. Large scale industrial processing sites will not meet these criteria.

¹ Section 87, Countryside and Rights of Way Act 2000.

² <http://www.cotswoldsaonb.org.uk/userfiles/file/position%20statements/renewable-energy-ps.pdf>

3. The Board notes that this application is for a scale of development which is not “small scale” as defined by the The Town and Country Planning (General Permitted Development) Order 1995. Therefore careful consideration has to be given whether a development of the scale proposed can be accommodated in a landscape designated for its natural beauty.
4. Views from the west of the existing site along Chavenage Lane show that the buildings currently on the site are very obtrusive in the relatively flat open landscape. (See attached) The development as proposed will extend the built development on the site significantly to the north on rising ground. Despite some limited reduction of ground levels, elements of the development, particularly the gas holder will be clearly higher than the existing buildings. These will probably break the skyline of trees to the east of the site. The proposed mitigation, in the form of bunding and tree planting thereon will not have a significant effect for a number of years. The Board would therefore object to this proposal for a large scale digester in a prominent site in the AONB due to adverse landscape impact.
5. However, the Board recognises the benefits for both reductions in carbon emissions and farm diversification presented by the proposal. The Board considers that the landscape impact of the both the proposed digester and the existing complex could be considerably reduced if the digester were sited immediately to the west of the existing complex. The digester buildings would then screen the existing unsightly buildings, and in time substantial planting around the whole site would be beneficial to the wider landscape. The Board would further suggest that the bunds are widened and more gently sloped in order not to present such an uncharacteristic feature in the landscape. The screen planting needs to be wider in order to maximise the mitigation effect.
6. Such a relocation would have the additional benefit of not requiring any changes to the existing rights of way network, and reducing the impact of the development from rights of way.
7. Should the Council be minded to grant permission for the site as currently proposed then due to the scale of the development the following issues need to be addressed:
 - The colour of the structures needs to be carefully considered
 - The bunds are widened and more gently sloped in order not to present such an uncharacteristic feature in the landscape.
 - The screen planting needs to be wider in order to maximise the mitigation effect.
 - Any external lighting should be resisted.
8. The Board notes that the highways authority has no objections to the scheme on the basis of the traffic movements predicted. The Board would be concerned if significant vehicle movements to and from the site took place along the narrow lanes to the east of the site. The Board would wish that if consent were granted consideration to be given to introducing a weight restriction to prevent such movements