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By email only to planningdc@gloucestershire.gov.uk

Dear Mr Canney

19/0089/CWMAJM – The winning and working of clay and restoration to amenity and nature conservation – Loaders Barn, Northcott Brick Ltd

Thank you for consulting the Cotswolds Conservation Board ('the Board') on the above planning application.

The proposed development is located in the Cotswolds Area of Outstanding Natural Beauty (AONB). The purpose of AONB designated is to conserve and enhance the natural beauty of the AONB. Whilst the Board recognises that the AONB is a living and working landscape, development in the AONB should be consistent with – and help to deliver – the purpose of designation.

The Board objects to the proposed development and recommends that the proposed development should not be granted planning permission.

The main reasons for this objection are that the proposed development would:

- constitute major development in the context of paragraph 172 and footnote 55 of the National Planning Policy Framework (NPPF) - as such, there should be a presumption against granting planning permission for the proposed development;
- not constitute exceptional circumstances or be in the public interest;
- primarily meet needs arising outside the AONB – as such, it would not be appropriate to locate the proposed development within the AONB;
- have significant adverse impacts on:
 - landscape quality / landscape character;
 - scenic quality / visual receptors;
 - tranquillity.

In terms of the evidence base submitted by the applicant, the Board strongly disagrees with the assertions that the proposed development would:

- have a '*minor net beneficial effect upon landscape character compared with the baseline*';
- have a moderate or minor / not important visual impact;
- constitute temporary or infrequent workday noise;
- be consistent with Policy CE4 (Tranquillity) of the Cotswolds AONB Management Plan.

The Board also considers that the applicant has not adequately assessed the traffic movements or noise. In both cases, the applicant has not compared the scenario of the *Conserving, enhancing, understanding and enjoying the Cotswolds Area of Outstanding Natural Beauty*

proposed development being granted planning permission with a scenario in which planning permission is refused and production at Wellacres Quarry (and, presumably, production at the brickworks) has come to an end.

In addition, the Board considers that the applicant has not adequately demonstrated the visual impacts of the proposed development. For example, the applicant has not provided photomontages of the views across the site from the footpath and bridleway when the bunds and storage areas have been installed and, post-restoration, when the new hedges are well established.

Further information relating to these issues and these recommendations is provided in Annex 1.

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 that extends to the right.

John Mills MRTPI
Planning and Landscape Officer

ANNEX 1. SUPPORTING INFORMATION FOR THE RESPONSE OF THE COTSWOLDS CONSERVATION BOARD TO PLANNING APPLICATION 19/0089/CWMAJM

MAJOR DEVELOPMENT

As stated in footnote 55 of the NPPF, *'whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined'*. In the context of the proposed development, the purpose for which the area (i.e. the AONB) has been designated is to conserve and enhance the natural beauty of the AONB).

Scale

The planning application indicates that the proposed development covers approximately 13ha. The Board would consider this to be a relatively large scale development in the context of a protected landscape such as the Cotswolds AONB and certainly not 'small scale'. For example, compared to the cluster of eight limestone quarries located along Buckle Street and the B4077, which lie in the Cotswolds AONB a few miles to the south, the proposed development would be larger (in area) than six of those eight quarries.

However, it is important to note that the proposed development would also involve infilling the adjacent Wellacres Quarry and processing the extracted clay in the existing brickworks. Therefore, when considering the scale of the proposed development, the existing 21ha site should also be taken into consideration.

With the existing site and the proposed site combined, the total area would be approximately 34ha. This scale of development is very significant in the context of the Cotswolds AONB and is larger than any of the eight limestone quarries referred to above. It should therefore be considered to be major development in this regard.

Nature

The Board agrees with the local planning authority's (LPA) Environmental Impact Assessment (EIA) Screening Opinion, which considers the proposed development to be Schedule 1 development under the Town and Country Planning (Environmental Impact Assessment (EIA) Regulations) 2017.

Schedule 1 development equates to Annex 1 development in the EIA Directive (85/337/EEC). The European Commission states that *'all projects listed in Annex I are considered as having significant effects on the environment and require an EIA'*.¹ As such, as the proposed development is considered to be Schedule 1 development, it should be considered as having significant effects on the environment. It should therefore be considered to be major development in this regard.

The NPPF, paragraph 205, states that *'in considering proposals for mineral extraction, minerals planning authorities should, as far as practical, provide for the maintenance of landbanks of non-energy minerals from outside AONBs'*. The proposed development, which involves the extraction of non-energy minerals within the AONB, would not be consistent with this aspect of the NPPF. It should therefore be considered to be major development in this regard.

¹ <https://ec.europa.eu/environment/eia/eia-legalcontext.htm>

The Cotswolds AONB Management Plan 2018-2023 (Policy CE3) recognises that provision should be made for quarrying within the AONB. However, this specifically relates to the quarrying of limestone. As such, the proposed development would not be consistent with the policies of the AONB Management Plan. The proposed development should therefore be considered to be major development in this regard.

Setting

The Cotswolds AONB Landscape Character Assessment (LCA) identifies 19 landscape character types (LCTs) within the Cotswolds AONB. The proposed development lies within Landscape Character Type 17B (Pastoral Lowland Vale - Vale of Moreton). The landscape sensitivity of this LCT is summarised in the Cotswolds AONB Landscape Strategy and Guidelines (LSG), which states that:

- *Limited woodland cover, a strong rural character, sparse settlement pattern and the proximity to elevated viewing opportunities on the neighbouring Farmed Slopes increases the sensitivity of the Pastoral Lowland Vale landscape to large scale built development.*

This increased sensitivity would also apply to the proposed development, given its scale and landscape and visual impact. As indicated in the applicant's Planning Statement (paragraph 3.2.3), the site of the proposed development displays some of the key characteristics / features of this LCT. For example, it has an '*open expansive character and expansive views ... with views possible across flat landscapes bordering river channels where vegetation cover is minimal.*'

The Board considers that the proposed development would have a significant adverse effect on this setting. The proposed development should therefore be considered to be major development in this regard.

Potential to have a significant adverse impact on the purpose of AONB designation

Landscape impacts – summary

- The Board questions the applicant's assertion that the landscape in this location has '*medium*' value. The Board considers that the landscape in this location should be deemed to have a '*high*' (or at least '*medium-high*') value.
- The Board agrees with the applicant's assertion that the susceptibility to change is '*medium*', not least because of the existing presence of the adjacent brickworks and quarry.
- The Board considers that the '*high*' value of the landscape combined with the '*medium susceptibility*' provides a '*high-medium*' landscape sensitivity, rather than the '*medium*' landscape sensitivity that the applicant has identified.
- The Board strongly disagrees with the assertion that the proposed development would have a '*minor net beneficial effect upon landscape character compared with the baseline due to the inclusion of more diverse native planting and new water bodies*'. For example, water bodies are not a key characteristic / feature of the landscape character in this location. Replacing the characteristic features of this landscape, such as the flat or gently undulating landform, with such waterbodies (and with the steep-sloped field surrounding the main waterbody) would have a detrimental effect on landscape character, rather than a beneficial effect.
- The Board considers that the landscape character would be fundamentally and permanently changed in a way that does not reflect the landscape character of this location. As such, there would be significant (or at least moderate-significant)

adverse impacts on landscape character, both during the thirty year life of the quarry and longer term, post-restoration. On this basis, the development should be considered to be major development in this regard.

Landscape impacts – supporting information

The Board questions the applicant's assertion that the landscape in this location has 'medium' value. The Board considers that the landscape should be classed as having 'high' (or at least 'medium-high') value.

The Board acknowledges that '*there should not be an over-reliance on designations as the sole indicator of value*'.² However, best practice guidance, as provided by the Landscape Institute's 'Guidelines for Landscape and Visual Impact Assessment' (GLVIA), also states that '*landscapes that are nationally designated [including AONBs] will be accorded the highest value in the assessment*'.³ These two principles combined indicate that AONB landscapes should be accorded the highest value unless location-specific factors indicate otherwise.

An important component of establishing the value of nationally designated landscapes is '*determining to what degree the criteria and factors used to support the case for designation are represented in the specific study area*'.⁴ This should include determining the extent to which the site of the proposed development - and its immediate vicinity - reflects the key features / characteristics of the relevant landscape character type.

As outlined above, the proposed development lies within Landscape Character Type (LCT) 17B (Pastoral Lowland Vale – Vale of Moreton). The location of the proposed development displays a number of the key features / characteristics of this LCT. For example, it is a component part of the:

- Extensive pastoral vale defined by the Farmed Slopes⁵.

It also has:

- Flat or gently undulating land fringed by distinctive shallow slopes;
- An open character and expansive views;
- Hedgerows of varying height and quality with intermittent hedgerow trees.

The location does not have to demonstrate all of the key characteristics / features of the relevant LCT in order for it to be considered representative of that LCT.

The presence of the footpath and the bridleway also reflect one of the special qualities of the Cotswolds AONB as '*an accessible landscape for quiet recreation*'.

The Board considers that the presence of these key features / characteristics and special qualities is sufficient for the landscape in this location to retain the high value status that AONB designation implies.

Table 3 in the applicant's LVIA is based on the criteria outlined in Table 5.1 of the GVLIA. Whilst these criteria provide a useful checklist, they are primarily intended to be used '*in*

² GLVIA, paragraph 5.45

³ GLVIA, paragraph 5.47

⁴ GLVIA, paragraph 5.23

⁵ The 'Farmed Slopes' are Landscape Character Type 15 in the Cotswolds AONB Landscape Character Assessment (LCA).

cases where there is no existing evidence to indicate landscape value'.⁶ Based on the best practice guidance outlined above, the key features / characteristics of the relevant LCT and the special qualities of the AONB should be a more important consideration.

The Board agrees with the applicant's assertion that the susceptibility to change is 'medium', not least because of the existing presence of the adjacent brickworks and quarry.

The Board considers that the 'high' value combined with the 'medium susceptibility' provides a 'high-medium' landscape sensitivity, rather than the 'medium' landscape sensitivity that the applicant has identified.

The Board strongly disagrees with the assertion that the proposed development would have a *'minor net beneficial effect upon landscape character compared with the baseline due to the inclusion of more diverse native planting and new water bodies'*.

For example, water bodies are not a key characteristic / feature of the landscape character in this location. Replacing the characteristic features of this landscape, such as the flat or gently undulating landform, with such waterbodies (and with the steep-sloped field surrounding the main waterbody) would, therefore, have a detrimental effect on landscape character, rather than a beneficial effect. The same principles apply to planting trees in the middle of fields, as proposed for the field that would contain the smaller water bodies.

The detrimental effects on landscape character would be even more significant during the 30 year operational phase of the proposed development, when large, tall and steep-sided stockpiles / bunds of material would be superimposed on the gently undulating landform.

Therefore, in conclusion, the Board considers that there would be significant adverse impacts on landscape character, both during the thirty year life of the quarry and longer term, post-restoration. On this basis, the development should be considered to be major development in this regard.

Visual impacts – predicted effects

The Board strongly disagrees with the applicant's assertions that:

- the effect on receptors on the rights of way would be moderate or 'not important';
- temporary visual effects would range between moderate/minor to minor adverse and not important;
- the residual visual effects experienced by residents following restoration would be neutral and not important;
- the proposed development could be accommodated with only modest and localised adverse landscape and visual effects during the operational phase, resulting in moderate or lower effects that are not important.

As outlined above, the site of the proposed development is located in Landscape Character Type 17B (Pastoral Lowland Vale – Vale of Moreton). The key characteristics / features of this LCT include an *'open expansive character and expansive views ... with views possible across flat landscapes bordering river channels where vegetation cover is minimal'*. This is certainly true of this location, including for receptors on the footpath that passes through the site and the bridleway on the south-eastern boundary. Given that these extensive views are a key feature of the landscape character in this location, any adverse impacts on these

⁶ GLVIA, paragraph 5.28.

views is likely to be significant, especially where these views would be blocked by the proposed development.

As well as being located within LCT 17B, the site of the proposed development is also very close to LCT15B (Farmed Slopes – Vale of Moreton Farmed Slopes). The Cotswolds AONB Landscape Character Assessment (LCA) states that *'the Farmed Slopes enclosing the vale may often be seen to stretch around the vale and form a distinct backdrop to lowland landscapes, adding to the sense of intimacy and visual unity'*. Again, this is certainly true for receptors on the footpath and bridleway, especially when looking in a westerly, southerly or south easterly direction (for example, from Viewpoints 1 and 8). Given the importance of these views towards the Farmed Slopes, any adverse impacts are likely to be significant, especially where these views would be blocked by the proposed development.

As indicated above, one of the special qualities of the Cotswolds AONB is the *'accessible landscape for quiet recreation, with numerous walking and riding routes'*. Therefore, any adverse impacts on the footpath and bridleway in this location would also have an adverse impact on this special quality, albeit at a relatively localised level.

With regards to the bridleway on the south-eastern boundary (a 500m length of which is adjacent to the site boundary), the proposed 5m high soil screening bund directly adjacent to the bridleway would completely block the current expansive views across the site for the 30 year lifetime of the quarry operation. This would include westerly or south westerly views towards the Farmed Slopes (LCT 17B). Even when the soil screening bund is removed, towards the end of the 30 year lifetime of the quarry, the view could still potentially be limited by the proposed hedgerow (compared to the current baseline where no hedgerow is present), depending on the height at which the hedge is maintained.

Similarly, the 'Northern Landform Sections' indicate that the proposed 'temporary' soil storage area, which would be directly adjacent to the footpath, would be a similar height to the soil screening bund on the south-eastern boundary. As such, it would completely block the current extensive views from the footpath looking south-east across the site towards the Farmed Slopes. Although classed as 'temporary', this soil storage area is still shown as being present in the 'Year 24' plan. On a more permanent basis, the south-easterly views from the footpath would be restricted by the proposed tree planting, although the views would be 'filtered' rather than completely blocked. The proposed hedgerow, adjacent to the west side of the footpath, could also potentially restrict views to the north-west, towards the brickworks, on a permanent basis, depending on the height of the hedge.

Given that most of the existing hedges in the area reach above head height, it should probably be assumed that the proposed hedges will also extend above head height.

Given the scale and duration of the impact (i.e. 5m high bunds / storage areas, up to 500m long, and of a 30 year duration) on receptors at these viewpoints, the Board considers that their impact should be classed as significant, particularly during the operational phase. The Board also considers that the longer-term, post-restoration visual impact of the proposed hedgerows and tree planting should probably be classed as moderate-significant for views from the bridleway and moderate for views from the footpath.

Given the significance of the visual impacts, the Board recommends that the proposed development should be deemed to be major development in this regard.

Visual Impact – Evidence Base

The Board considers that the photographs shown in the LVIA are inadequate as a means of indicating the likely visual impact of the proposed development, especially in the context of an EIA Schedule 1 development. For example, there are no photomontages of the likely visual impacts of:

- (i) the 5m high soil screening bund (or, post-restoration, the proposed hedge, including summer and winter images) on receptors at viewpoints 6-8; or
- (ii) the soil storage area (or, post-restoration, the proposed tree planting and hedge, including summer and winter images) on receptors at viewpoints 1 and 2 (and / or a mid-point in between viewpoints 1 and 2).

These photomontages are crucial for clearly demonstrating the likely visual impacts.

Also, whilst, visual impacts are likely to be less significant for viewpoints further away, it would be useful to have photomontages showing the visual impacts of the proposed scheme (particularly, the visual impact of the proposed bunds / storage areas and vehicles / equipment) from some of these viewpoints (for example, viewpoints 10 and 11) at various points in time through the life of the scheme and post-restoration.

The Board recommends that the applicant should be asked to provide this additional information.

Tranquillity / Noise

The relative tranquillity of the Cotswolds AONB is one of its special qualities. In other words it is one of the features of the AONB that makes it so outstanding that it is in the nation's interest to safeguard the AONB. As such, potential adverse impacts on tranquillity are a key consideration.

Four key considerations, in this regard are the:

- i. potential impacts on traffic movements on local roads, in particular, HGV movements;
- ii. potential noise impacts on local receptors;
- iii. working hours;
- iv. compliance with Policy CE4 (Tranquillity) in the Cotswolds AONB Management Plan 2018-2023

i. Traffic Movements

The applicant's Transport Statement compares the traffic movements on local roads resulting from the proposed development with the current baseline. It indicates that there will be no increase in traffic movements, compared to the current baseline, because the level of brick production will remain the same.

However, whilst this may be true, the Transport Statement fails to compare the traffic movements on local roads from the proposed development with a baseline in which the proposed development is not granted planning permission and in which clay is no longer being extracted from Wellacres Quarry, processed into bricks and exported from the brickworks. This would reflect the status quo in, say, three-years-time, and beyond, when permitted reserves at Wellacres Quarry have been worked out.

To address this issue, the Board recommends that the applicant should be required to undertake a further transport assessment that compares these two scenarios (i.e. planning

permission granted v. planning permission not granted). In particular this assessment should identify the difference in the number of HGV movements on the B4479, including through Paxford and Blockley, between these two scenarios. In line with the Board's Tranquillity Position Statement, if the difference in HGV movements between these two scenarios is 10% or more, then this would be a significant factor.

ii. Noise

The applicant has undertaken a noise assessment in relation to the four residential properties that are in close proximity to the site. However, the impacts of noise pollution on receptors using the footpath and bridleway should also be an important consideration. This is particularly important given that '*tranquillity*' and '*an accessible landscape for quiet recreation*' are both special qualities of the Cotswolds AONB.

To address this issue, the Board recommends that the applicant should be required to undertake a further assessment of the impacts of noise from the development on receptors using the footpath, the bridleway and the B4479.

As well as comparing noise levels with the current baseline, a comparison should also be made with noise levels in a scenario where planning permission is not granted and where clay is no longer being extracted from Wellacres Quarry, processed into bricks and exported from the brickworks (and, presumably, the brickworks are no longer active).

Any noise assessment should also take into account the fact that there would be a period of time (approximately two to five years) where both the Wellacres Quarry site and the proposed development would be operational, involving noise from both operations.

The Board strongly objects to the applicant's implication that the reduction in noise associated with the ending of the Wellacres Quarry operation is one of the benefits of the proposed development and is one of the ways in which the proposed development is helping to reduce noise pollution in the area. The Wellacres Quarry operation would be coming to an end within the next few years regardless of whether or not the proposed development is granted planning permission. Therefore, the proposed development should not be considered to be reducing noise levels associated with the Wellacres Quarry operation.

The Board strongly objects to the applicant's assertion that the noise emissions represent 'temporary or infrequent workday noise'. The noise associated with the proposed development (including the resulting continued use of the brickworks) would continue six days a week for 30 years. There is no way that such noise could be considered to be temporary or infrequent.

iii. Working Hours

The planning application indicates that the proposed development would operate six days per week, including Saturday afternoons. For a quarry to operate on a Saturday afternoon would be highly unusual, particularly in the context of a protected landscape such as the Cotswolds AONB. It would have significant adverse effects on the relative tranquillity of the area at these times.

The Board recommends that, if planning permission is granted, the development should not be permitted to operate on Saturday afternoons.

iv. Cotswolds AONB Management Plan

For the reasons outlined above, the Board strongly objects to the applicant's assertion that the proposed development complies with Policy CE4 (Tranquillity) of the Cotswolds AONB

Management Plan 2018-2023. In other words, we strongly object to the assertion that the proposed development would:

- (i) avoid and / or minimise noise pollution and other visual and aural disturbance; or
- (ii) remove and / or reduce existing sources of noise pollution and other visual and aural disturbance.

Storing overburden on-site v transporting to Wellacres Quarry

The Board is aware that consideration has also been given to keeping overburden on site (i.e. east of the B4479), rather than transferring it to Wellacres Quarry across the road. This would require additional storage space on the land between the B4479 and the footpath. This would presumably be for a period of up to 30 years, until the site has been restored.

Storing the overburden on-site, in this location, would significantly increase the visual impact for receptors on both the B4479 and the footpath. For example, it could potentially block westerly and south westerly views from the footpath – and south easterly views from the B4479 - towards the Farmed Slopes.

Storing the overburden in this way would also have a significant adverse effect on landscape character as the piles of overburden would be at odds with the key landscape characteristic of 'flat or gently undulating land fringed by distinctive shallow slopes'.

Transferring the overburden to Wellacres Quarry would facilitate the creation of shallow margins in the waterbody there. Shallow margins add a significant amount of biodiversity interest compared to deep, steep sided waterbodies. If the overburden is retained on site (i.e. west of the B4479), there might not be sufficient material to create significant areas of shallow margins on either site. From a biodiversity perspective, when considering the main waterbody on each site, it would probably be better to have one waterbody with extensive shallow margins and one deep, steep-sided waterbody than two relatively deep, steep-sided waterbodies. As such, transferring the overburden to Wellacres Quarry would probably be beneficial from a biodiversity perspective.

On the other hand, the beneficial effects of storing overburden on-site would include significantly reducing the number of HGV movements across the B4479 and increasing the amount of material that could be used in the on-site restoration scheme. Using the overburden for on-site restoration would significantly help to restore the site to a landform that is more in keeping with the landscape character of the area (for example, by restoring the site to a gently sloping landform rather than a steep-sided landform). As such, the long term adverse impacts on landscape character would potentially be less significant if the overburden is retained on site than if the overburden is taken off site.

The Board acknowledges that the applicant has stated that there is no intention to import material into the proposed development. However, it is important to note that retaining the overburden on site and using it in the restoration of the site would reduce the risk of an application being submitted at a later date to import material to infill the site.

On this basis, the Board considers that the long-term benefits of retaining the overburden on-site would potentially outweigh the associated, shorter term adverse visual impacts. It would also outweigh the potential biodiversity benefits of using the overburden to create shallow margins in the waterbody at Wellacres Quarry. This is partly because, in line with paragraph 172 of the NPPF, landscape considerations should be given 'great weight' in the planning decision, whereas, in the context of this proposal, potential biodiversity benefits would be a lower ranking 'important consideration'.

However, the Board considers that both options (i.e. retaining overburden on site v. transferring it to Wellacres Quarry) would have significant adverse effects on the purpose of AONB designation. As such, we consider that planning permission should be refused for the development involving either option.

EXCEPTIONAL CIRCUMSTANCE / PUBLIC INTEREST

Assuming that the proposed development is considered to be major development, as recommended by the Board, there should be a presumption against granting planning permission. Planning permission should only be granted if the applicant can demonstrate that exceptional circumstances apply and that the development would be in the public interest. In order to do this, the applicant would, in effect, need to demonstrate that:

- there is an exceptional need for the development;
- the need for the development (i.e. the demand for 1.4 million tonnes of clay and the resulting bricks) cannot be met outside the AONB;
- the need for the development outweighs any detrimental effect on the environment, the landscape and recreational opportunities.

Even if the development is not deemed to constitute major development, these should still be important considerations when weighing up the need for development with the statutory purpose of conserving and enhancing the natural beauty of the AONB and the highest status of protection that is afforded to AONBs in this regard.

Need

At a national level, the NPPF (paragraph 205) states that '*mineral planning authorities should, as far as practical, provide for the maintenance of landbanks of non-energy minerals from outside Areas of Outstanding Natural Beauty*'. The strong inference in this statement, is that the extraction of these non-energy minerals (including clay) should, as far as practical, take place outside of AONBs (and outside the other designations specified in paragraph 205 of the NPPF).

The Cotswolds AONB Management Plan 2018-2023 (Policy CE3) recognises that provision should be made for quarrying in the AONB. However, this specifically relates to the quarrying of limestone, at an appropriate scale, in order to provide building materials that help maintain and enhance the local distinctiveness of the AONB.

Although the proposed development doesn't relate to the quarrying of limestone, it could potentially be argued that the extraction of clay to make bricks does provide building materials that help maintain and enhance the local distinctiveness of the Cotswolds AONB. For example, the Cotswolds AONB Landscape Character Assessment for Landscape Character Type 17B (Pastoral Lowland Vale – Vale of Moreton) specifically states that '*as a consequence of a brick works in the area ... there are a number of brick built houses in local towns and villages*'.

However, even in this part of the AONB, brick built houses constitute a relatively small proportion of the housing stock. The majority of housing features the limestone for which the Cotswolds is so famous (or, at least, stone / brick of a similar colour to limestone). As such, the Board would still seek for the majority of new housing in this part of the AONB - and across the AONB as a whole - to incorporate limestone, rather than clay bricks. This is an essential component of conserving and enhancing the natural beauty of the AONB. Assuming that new housing in the AONB complies with this principle, the demand for bricks within this part of the AONB (and the AONB as a whole) is likely to be relatively small.

The Cotswolds AONB Management Plan 2018-2023 (Policy CE12) states that '*development in the Cotswolds AONB should be based on robust evidence of local need arising from within the AONB*'. This principle applies equally to quarrying as it does to other forms of development, such as housing. The applicant has not provided an indication of the percentage of bricks that are produced at the brickworks that are used in the Cotswolds AONB (i.e. the extent to which the bricks produced at the brickworks meet local needs arising within the AONB). As such, they have not demonstrated that the proposed development is consistent with this policy. However, it is telling that all five examples of where the bricks have been used (as provided in paragraph 1.1.6 of the applicant's Planning Statement) are located outside the AONB.

Developing outside the AONB or meeting the need in some other way

The applicant has not demonstrated that the demand for clay / bricks cannot be met by clay quarries and brickworks outside the AONB.

Detrimental effects

The Board's comments have highlighted that, contrary to the applicant's assertions, the proposed development would, in fact, have significant adverse effects on the purpose of AONB designation. The applicant has not demonstrated that the need for the development outweighs these significant adverse effects.

Exceptional circumstances / public interest

Based on the information outlined above, the Board does not consider that the applicant has demonstrated exceptional circumstances or that the development would be in the public interest, particularly in the context of an AONB landscape whose distinctive character and natural beauty are so outstanding that it is in the nation's interest to safeguard it.