

4th May 2020

Corrina Clements
The Planning Inspectorate
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Bristol
BS1 6PN



By email to teame1@pins.gsi.gov.uk and online via Appeals Casework Portal

Dear Ms Clements

**APP/C1625/C/20/3247582, APP/C1625/C/20/3247583 & APP/C1625/W/20/3244956 –
Land at Lot 1 and 2, Waterley Bottom, North Nibley GL11 6ED**

The Cotswolds Conservation Board ('the Board') wishes comment on the above planning appeals which relate to:

- Enforcement action relating to works already undertaken, without planning permission, at Lot 1 & 2 (APP/C1625/C/20/3247582 and APP/C1625/C/20/3247583)
- The non-determination of planning application S.19/2398/FUL, regarding the erection of two farm buildings (APP/C1625/W/20/3244956)

The Board recognises the need for sustainable agricultural enterprises within the Cotswolds AONB. The Board also recognises that appropriately located and designed agricultural buildings that are needed as part of such enterprises are an integral part of the farmed landscape of the Cotswolds AONB. However, in this instance, the Board recommends that:

- the three appeals should be dismissed;
- the provisions of the served enforcement notice should be implemented; and
- the agricultural building(s) proposed in planning application S.19/2398/FUL should be refused planning permission.

The reasons for these recommendation are as follows:

- Lot 1 & 2 is located in a particularly sensitive section of the Cotswolds Area of Outstanding Natural Beauty (AONB) – Landscape Character Type 3 (Rolling Hills and Valleys) – in which the upper valley sections represent quiet rural landscapes with strong associations of peace, tranquillity and a sense of remoteness.
- The section of Waterley Bottom in which Lot 1 & 2 is located is representative of many of the key features / characteristics of this landscape character type.
- The works that are subject to the enforcement notice ('the works') are not eligible for permitted development – as such, planning consent is required.
- The works have already had an adverse impact on the natural beauty of the AONB, including landscape and scenic beauty, tranquillity and biodiversity.
- The proposed agricultural building(s) would further exacerbate these adverse impacts.
- The works and the proposed agricultural building would potentially have an adverse impact on the dark skies of the AONB.
- The applicant has not demonstrated that the works and / or the proposed agricultural building are reasonably necessary for the purpose of agriculture within the unit or that

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they are essential to the maintenance or enhancement of a sustainable farming enterprise.

It is worth noting that the Board has also objected to the more recent planning application S.20/0128/FUL, which proposes an alternative agricultural building for Lot 1 & 2, for similar reasons.

If the applicant is minded to pursue the erection of an agricultural building on Lot 1 & 2, the Board recommends that they should withdraw planning applications S.19/2398/FUL and S.19/0128/FUL and submit a new planning application. This planning application should include:

- Robust evidence that the proposed development is reasonably necessary for the purpose of agriculture within the unit and that it is essential to the maintenance or enhancement of a sustainable farming enterprise.
- Details of any associated groundworks, including access to the buildings and onto the parcel of land.
- A comprehensive landscape and visual impact assessment (LVIA) that complies with the guidelines published by the Landscape Institute. This should, at the very least, include wire frame images of the proposed building(s) (or, ideally, photomontages). It should also address related issues such as tranquillity and dark skies. Given that at least three different locations have now been proposed for agricultural buildings, it would be useful if the LVIA provided a comparison of location options, particularly with regards to visual impact.
- Information on how the proposed development would deliver net-gains for biodiversity.

Further information relating to these points is provided in Annex 1 below.

If you have any queries regarding the Board's response, please do not hesitate to get in touch.

Yours faithfully,

A handwritten signature in black ink that reads "John Mills". The signature is written in a cursive style with a long, sweeping underline.

John Mills MRTPI
Planning and Landscape Officer

**ANNEX 1. FURTHER INFORMATION RELATING TO THE COMMENTS OF THE
COTSWOLDS CONSERVATION BOARD ON PLANNING APPEALS
APP/C1625/C/20/3247582, APP/C1625/C/20/3247583 & APP/C1625/W/20/3244956**

Permitted development rights v planning consent

With regards to the enforcement appeal, the applicant asserts that the works that have been undertaken should be permitted under permitted development rights. However, as Stroud District Council has identified, the developer must, before beginning any works, apply to the planning authority as to whether prior approval will be required. Given that no prior approval notification has been presented to the local authority and that the works have already been implemented, permitted development rights do not apply in this instance. Therefore, the works that have been implemented require planning consent.

With regards to both the enforcement appeal and the non-determination appeal, development on Lot 1 & 2 should be assessed against the requirements of national and local planning policy, including the National Planning Policy Framework (NPPF), Stroud Local Plan and the Cotswolds AONB Management Plan 2018-2023.

Given that the existing works require planning permission and that they relate to the use of the same parcel of land as the agricultural building(s) proposed in planning application S.19/2390/FUL, the Board considers that both the existing works and the proposed agricultural buildings should be considered together, in terms of their potential adverse impacts.

Number of buildings

Planning application S.19/2390/FUL proposed two agricultural buildings – Building A (for the storage of animal feeds and fodder) and Building B (for the storage of implements, tractor and trailer). However, the applicant's Statement of Case for the non-determination appeal clarifies that the application that is now being considered in the appeal just relates to Building A. This is because, in a letter to the local planning authority, dated 6th January 2020, the applicant requested that Building B be omitted from the application.

On this basis, the Board's comments relating to agricultural buildings on Lot 1 & 2 only relate to Building A. However, it is worth noting that if Building B was also taken into account, the landscape and visual impacts would be significantly increased due to the increase in mass, scale and form of the buildings.

Consideration of the Cotswolds Area of Outstanding Natural Beauty

The site which the appeals relate to (Lot 1 and 2, Waterley Bottom) is located in the Cotswolds Area of Outstanding Natural Beauty (AONB). AONBs are landscapes whose distinctive character and natural beauty are so outstanding that it is in the nation's interest to safeguard them. As outlined in paragraph 172 of the National Planning Policy Framework (NPPF):

- *'great weight should be given to conserving and enhancing landscape and scenic beauty'* in AONB;
- AONBs – alongside National Parks – *'have the highest status of protection in relation to these issues'*;
- the conservation and enhancement of wildlife are also *'important considerations in these areas'*.

The purpose of AONB designation is to conserve and enhance the natural beauty of the AONB. Relevant authorities (including local planning authorities and the Planning Inspectorate) have a statutory duty to have regard to this purpose.

The importance of the Cotswolds AONB is reflected in Delivery Policy ES7 of the Stroud Local Plan, which states that, within the AONB and its setting, *'priority will be given to the conservation and enhancement of the natural and scenic beauty of the landscape'*. Delivery Policy ES7 also required that *'development proposals should conserve and 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'*.

It is important to note that a number of factors contribute to the natural beauty of the AONB including:¹

- landscape quality;
- scenic quality;
- relative wildness;
- relative tranquillity (including dark skies);
- natural heritage (including biodiversity);
- cultural heritage (including historic environment).

As such, AONB considerations extend beyond landscape and visual impact.

The Cotswolds Conservation Board is required, by statute, to produce the Cotswolds AONB Management Plan, which sets out policies for the management of the Cotswolds AONB.² The AONB Management Plan should be an important material consideration in planning matters.

Based on these legislative and policy requirements, key considerations for all three appeals are the extent to which the developments on Lot 1 & 2 are consistent with (or adversely affect):

- the statutory purpose of conserving and enhancing the natural beauty of the Cotswolds AONB;
- the policies of the Cotswolds AONB Management Plan.

Impacts

Landscape impacts

The Cotswolds AONB Landscape Character Assessment³ identifies 19 different landscape character types (LCT) in the Cotswolds AONB. The proposed development is located in LCT 3B (Rolling Hills and Valleys – Stinchcombe and North Nibley). The Cotswolds AONB Landscape Strategy and Guidelines (LSG)⁴ describes the landscape sensitivity of LCT3:⁵

¹ Natural England (2011) *Guidance for assessing landscapes for designation as National Park or Areas of Outstanding Natural Beauty in England*. Table 3 and Appendix 1.

² Cotswolds Conservation Board (2018) *Cotswolds AONB Management Plan 2018-2023*. ([Link](#)).

³ Cotswolds Conservation Board (2004) *Cotswolds AONB Landscape Character Assessment*. ([Link](#)).

⁴ Cotswolds Conservation Board (2016) *Cotswolds AONB Landscape Strategy and Guidelines*. ([Link](#)).

⁵ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/07/lct-3-rolling-hills-and-valleys-2016.pdf>

- *The upper valley sections represent quiet rural landscapes with strong associations of peace, tranquillity and a sense of remoteness. Landscape character is strong, and these sections of the valleys are highly sensitive to development that may compromise these characteristics.*

This section of Waterley Bottom is representative of this quiet rural landscape and is therefore highly sensitive to development. The absence of buildings and other man-made features⁶ on Lot 1 & 2 contributes significantly to this sense of peace, tranquillity and remoteness.

This section of Waterley Bottom is also representative of many of the 'key features / characteristics' of LCT 3 including:

- *Relatively enclosed and secluded 'secret' character in upper sections of the valleys and narrow valley bottoms.*
- *Steep sided concave valleys with steeper upper slopes often dominated by woodland, contribute to the area's rural and secretive character.*
- *Valleys drained by ... tributary streams [which] provide important linear habitats linking the Vale to the High Wold.*
- *Area principally under pastoral use.*
- *Fields ... enclosed with hedgerows, with hedgerow trees.*

The extent to which the key features of LCT 3 are represented in this section of Waterley Bottom makes the area highly susceptible to change and further increases the landscape sensitivity.

It is also important to note that the LSG (Section 3.10) includes a guideline to '*conserve the secluded, pastoral character of the valleys*'.

Landscapes that are nationally designated, such as AONBs, are accorded the highest value in landscape and visual impact assessments.⁷ This high value is re-enforced by the extent to which the key features of LCT 3 are represented in this location. This 'high value' further adds to the landscape sensitivity.

The proposed building is approximately 18m long and 9m wide (160m²) and up to 5m high. This is quite modest compared to the agricultural buildings at, say, Waterley Farm and Sandfield Farm. However, those larger buildings form an integral part of a farm complex, whereas the proposed building would be completely isolated. There do not appear to be comparable examples of similar size, isolated agricultural buildings in this section of Waterley Bottom.

The existing groundworks have already had a significant adverse impact on the associations of peace, tranquillity and the sense of remoteness, associated with LCT 3. This adverse impact applies not just to the site itself, but to the wider valley area. The proposed building (and the associated excavations into the valley-side) would further add to this adverse impact. As such, the scale of change is significantly more than just the scale of current groundworks and the proposed buildings themselves.

When considering landscape and visual impacts, the duration and reversibility of the proposed development is an important consideration. In this case, the current groundworks

⁶ Prior to the current groundworks, which are the subject of the enforcement appeal.

⁷ Landscape Institute and Institute of Environmental Management and Assessment (2016) Guidelines for Landscape and Visual Impact. Paragraph 5.47

and the proposed building are likely to be of long term duration and are unlikely to be reversed in the near future (unless the provisions of the enforcement notice are implemented).

Combining all of the above factors, the Board considers that the impacts on landscape character resulting from the current groundworks and the proposed building (both individually and collectively) are likely to be significant.

Policy CE1 of the Cotswolds AONB Management Plan 2018-2023 states that '*proposals ... should have regard to, be compatible with and reinforce the landscape character of the location*'.

Policy CE10 states that:

- *Proposals relating to development in the Cotswolds AONB ... should ... be compatible with guidance produced by the Cotswolds Conservation Board, including the Cotswolds AONB Landscape Strategy and Guidelines.*

Given that the works and the proposed building would have an adverse impact on landscape character (both individually and collectively), they are not consistent with the policies of the Cotswolds AONB Management Plan or with Policy ES7 of the Stroud Local Plan.

Visual impacts

Very little information has been provided by the applicant regarding the potential visual impacts of the proposed development. The only notable information provided in the applicant's Statement of Case is that:

- *The proposed building in the current proposed location will be concealed within the overall landscape being set against the background of a steep bank, and will not detract the view from the adjoining property or views from other properties in North Nibley.*

In addition, the Design and Access Statement for planning application S.19/2398/FUL states that:

- *There are distant views for the higher reaches of the land towards Forthay and North Nibley.*
- *Both [Buildings A and B] would site well below the skyline.*
- *When viewed from the water pumping station to the south, both buildings [Buildings A and B] will be seen sitting into the site, with a simple outline in appearance, set against a rural wooded landscape / and the adjoining hedgerows.*
- *The roof of both buildings [Buildings A and B] would be clad using dark grey profile sheeting.*

The Board acknowledges that the visual impact of the proposed building would be reduced, to some degree, by being set against the backdrop of a steep slope (when seen from the south). However, as indicated above, the excavations that would be required to accommodate the building on the steep slope would, themselves, have an adverse impact.

In addition, the applicant's assertion that the building would be set against adjoining hedgerows is questionable. The applicant's site plan indicates '*naturalised planting along roadway*' along the south side of the road that lies immediately to the north of the proposed building. However, Google Earth shows that there isn't actually any hedgerow along this

section of road for a distance of approximately 150m. Instead, there is an expansive view from the road, across the site, towards Nibley Knoll. It is not clear if the '*naturalised planting along roadway*' is what the applicant proposes to mitigate the adverse visual impacts. However, if it is, this mitigation could, itself, potentially have adverse visual impacts by blocking the expansive view across the valley.

Perhaps most importantly, the applicant has not taken into account the wider visual impacts around the valley of Waterley Bottom or the significance of other visual receptors. The Board is aware that the area where the current groundworks and the proposed building are located is a popular location for informal recreation, such as walking and horse-riding, on the local roads, footpaths and bridleways. These recreational users come to experience the sense of peace, tranquillity and remoteness that is characteristic of this area. The current absence of buildings in Lot 1 & 2 contributes significantly to the perception of the area for visual receptors.

Footpaths in the valley link directly to the Cotswold Way National Trail and to the local landmark of the Tyndale Monument, which sits on the Cotswold Way. This adds a level of significance to the impacts on visual receptors, particularly with regards to the connecting footpaths.

With regards to the works that have already been carried out on Lot 1 & 2, photographic evidence provided on the Stroud District Council planning portal demonstrates that these works have already had a significant adverse impact on this sense of peace, tranquillity and remoteness. The addition of a new building in this sensitive location could potentially have an additional adverse impact on this sense of peace, tranquillity and remoteness for visual receptors.

Given these adverse visual impacts, the high landscape sensitivity of this location and the troubled history of development proposals on this site (i.e. Lot 1 & 2), the Board recommends that, prior to any development being permitted on this site, a comprehensive Landscape and Visual Impact Assessment (LVIA) should be undertaken. With regards to visual impact, such an LVIA should identify the zone of theoretical visibility, address visual impacts for visual receptors and include wire frame images of the proposed development superimposed on photographs from these key viewpoints / visual receptors. This LVIA should be carried out in line with the LVIA guidance published by the Landscape Institute and the Institute for Environmental Management and Assessment.⁸

Key viewpoints / visual receptors could potentially include:

- The view looking south from the road immediately to the north of Building A (GR: ST75299642).
- The view looking north / north east from the road immediately to the east of Smart's Green (e.g. GR: ST75319607).
- The view looking north east from the footpath that descends from Nibley Knoll to Pitt Court (e.g. GR: ST74749588) – this would be particularly significant given its connection with the Cotswold Way National Trail.

Policy CE1 of the Cotswolds AONB Management Plan states that '*proposals ... should have regard to the scenic quality of the location and its setting and ensure that views ... and visual amenity are conserved and enhanced*'.

⁸ Landscape Institute and Institute of Environmental Management and Assessment (2013) *Guidelines for Landscape and Visual Impact Assessment*. Third edition.

Given that the works and the proposed agricultural buildings would have an adverse visual impact (both individually and collectively), they are not compatible with the policies of the Cotswolds AONB Management Plan.

Impacts on tranquillity

As indicated above, the tranquillity of this locality, including its 'secret' nature, is one of the factors that makes the area so sensitive to development. The relative tranquillity of the AONB is one of its special qualities. In other words, it is one of the factors that makes the area so outstanding that it is in the nation's interest to safeguard it. The absence of man-made features in Lots 1 and 2 contributes significantly to the tranquillity of this area.

Policy CE4 of the Cotswolds AONB Management Plan states that development proposals '*should have regard to this tranquillity by seeking to (i) avoid and (ii) minimise ... visual disturbance.*'

As indicated above, the current groundworks have already had a significant adverse impact on the tranquillity of the local area. Locating a new, isolated building in this locality is likely to increase the adverse impact on the area's tranquillity. As such, these development are not compatible with the policies of the Cotswolds AONB Management Plan.

More information on tranquillity is provided in the Board's Tranquillity Position Statement.⁹

Closely related to the issue of tranquillity is the issue of 'relative wildness'. Natural England has identified relative wildness as one of the criteria that contributes to the natural beauty of protected landscapes, including AONBs.¹⁰ Factors that contribute to this relative wildness include:¹¹

- **A sense of remoteness** (for example, (i) relatively few (main) roads or other transport routes and (ii) distant from, or perceived as distant from, significant habitation).
- **A relative lack of human influences** (for example, uninterrupted tracts of land with few built features and few overt industrial or urban influences).
- **A sense of enclosure and isolation** (for example, sense of enclosure provided by woodland and landform that offers a feeling of isolation).
- **A sense of the passing of time and a return to nature** (for example, absence or apparent absence of active human intervention).

Waterley Bottom, where the proposed development is located, demonstrates all of these factors of relative wildness. This adds further weight to not introducing new, isolated buildings into this landscape.

Impacts on dark skies

Planning application S.19/2398/FUL does not appear to make any reference to the lighting that might be used in the proposed development. If artificial lighting was to be used in and around this new, isolated building (and / or in the vicinity of the works that have already been implemented), this could significantly increase levels of light pollution in the area. This increase in light pollution could adversely affect sense of tranquillity and remoteness of the

⁹ Cotswolds Conservation Board (2019) *Tranquillity Position Statement*. ([Link](#)).

¹⁰ Natural England (2011) *Guidance for assessing landscapes for designation as National Park or Areas of Outstanding Natural Beauty in England*. ([Link](#)).

¹¹ As above – Appendix 1, pages 24 and 25.

area and the extensive dark skies of the Cotswolds AONB. These dark skies are one of the special qualities of the Cotswolds AONB so any adverse impacts are particularly significant.

The Cotswolds AONB Landscape Strategy and Guidelines (LSG) for this landscape character type (LCT 3 (Rolling Hills and Valleys)) identifies '*the introduction of lit elements in areas of characteristically dark valley*' as a potential adverse impact resulting from agricultural intensification. The guideline provided in the LSG is to '*conserve dark stretches of valley*'.

Policy CE5 of the Cotswolds AONB Management Plan 2018-2023 states that development proposals '*should have regard to these dark skies by seeking to (i) avoid and (ii) minimise light pollution.*'

As such, the Board recommends that development on Lot 1 & 2 should not include artificial light. If lighting is permitted, it should be consistent with the best practice guidance provided in the Board's Position Statement on Dark Skies and Artificial Light.¹²

Biodiversity

One of the key features of LCT 3 (Rolling Hills and Valleys) is the '*tributary streams [which] provide important linear habitats linking the Vale to the High Wold*'. These tributary streams include the Doverte Brook, which flows through Lot 1 & 2. As such, any adverse impacts on Doverte Brook also represent an adverse impact on this key feature of the landscape character of this section of the Cotswolds AONB.

It is also worth noting that the LSG (Section 3.10) includes a guideline to '*encourage initiatives that seek to restore or enhance the quality of watercourses and their habitats*'. However, the works that have been undertaken at Lot 1 & 2 have clearly had an adverse impact on Doverte Brook and damaged the associated linear habitat.

As indicated above, the key features / characteristics of LCT 3 (Rolling Hills and Valleys) include '*fields ... enclosed with hedgerows, with hedgerow trees ...*'. The LSG (Section 3.10) identifies '*the loss of hedgerows*' and '*the removal of semi-natural vegetation cover*' as two of the undesirable '*potential landscape implications*' resulting from agricultural intensification in the valleys. The LSG also provides a guideline to '*conserve field boundary and in-field trees and seek opportunities to plant replacements*'. However, the works that have been implemented on Lot 1 and 2 have involved the removal of hedgerows and trees, with no indication being given of how the works would deliver a net-gain for biodiversity in this regard.

Much of the land in the vicinity of Lot 1 & 2 (particularly immediately to the north and east, along the southern boundaries of Millend Wood and Ashen Plains Wood) is either 'good quality semi-improved grassland' or 'lowland calcareous grassland', both of which are priority habitats. Lowland calcareous grassland is a particularly important feature of the Cotswolds AONB, with flower-rich grasslands being one of the 'special qualities' of the AONB. Lot 1 & 2 has the potential to provide similar priority habitat. However, the works that have been implemented on Lot 1 & 2 appear to have had an adverse impact on the grassland within this site, rather than a beneficial impact.

Policy CE7 of the Cotswolds AONB Management Plan 2018-23 states that:

¹² Cotswolds Conservation Board (2019) *Dark Skies and Artificial Light Position Statement*. ([Link 1](#), [2](#), [3](#), [4](#))

- *biodiversity in the Cotswolds AONB should be conserved and enhanced by establishing a coherent and resilient ecological network across the Cotswolds AONB and its setting;*
- *proposals that are likely to impact on the biodiversity of the Cotswolds AONB should provide a significant net-gain in biodiversity.*

Based on all of the points outlined above, the works are clearly not consistent with the LSG or with the policies of the Cotswolds AONB Management Plan.

The impact of the proposed agricultural building on biodiversity are likely to be less significant. However, further information is required to demonstrate how the development would deliver net-gains for biodiversity (without causing adverse landscape and visual impacts).

Need

Policy CE12 of the Cotswolds AONB Management Plan 2018-2023 states that:

- Development in the Cotswolds AONB should be based on robust evidence of local need arising from within the AONB.

As such, evidence of need is an important consideration for the Board.

There is no reason why a planning application for an agricultural building should be treated any less stringently than they would under Part 6 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015, where there are three important considerations:

1. The buildings / works must be on agricultural land comprised in an agricultural unit.
2. The buildings / works must be reasonably necessary for the purpose of agriculture within the unit.
3. The buildings / works should be designed for agricultural purposes.

The Stroud Local Plan (Core Policy C15) is even more stringent in relation to point 2, in that it requires such proposals to be essential to the maintenance or enhancement of a sustainable farming or forestry enterprise within the District.

- *Proposals outside identified settlement development limits will not be permitted except where ... it is essential to the maintenance or enhancement of a sustainable farming or forestry enterprise within the District.*

With regards to point 1, the Board is aware that the site is used (or, at least, has been used) for grazing livestock and that the parcel of land is larger than 5ha. As such, it could potentially be argued that the development is taking place on agricultural land within an agricultural unit.

However, there is a lack of clarity from the applicant on exactly what the *proposed* land use is. For example, the applicant's Statement of Case for the non-determination appeal states that *'it is the appellant's intention to establish a viable farm business on the holding specialising in the production of rare breeds cattle'*. In contrast, the applicant's Design and Access Statements for planning application S.19/2398/FUL and the more recent planning application, S.20/0128/FUL (which was submitted at the same time as the applicant appealed the enforcement action and non-determination of S.19/2398/FUL), state that *'the applicants have a particular interest in the rearing of pheasants and also exotic species,*

aimed at the home market'. Case law has established that the rearing of pheasants is not agriculture because the birds are raised mainly for sporting purposes and cannot, therefore, be considered to be livestock.¹³ Therefore, if the proposed use of this land is actually for the rearing of pheasants, then the land would not count as agricultural land and the proposed development would not comply with point 1, above.

The storage of non-agricultural vehicles is certainly not agriculture. As such, the land that is being used (and, potentially, would be used) for this storage should not be included in the area (in hectares) that is considered to be '*agricultural land comprised in an agricultural unit*'.

With regards to point 2, the applicant has provided no information to demonstrate that the works and / or the proposed building are reasonably necessary for the purpose of agriculture within the unit, let alone being *essential* to the maintenance or enhancement of a sustainable farming enterprise. For example, the applicant has provided no information on the number of livestock that are / will be grazed on the land or the amount of animal feed / fodder that would be required to feed this number of livestock. Nor has the applicant provided information on the long-term viability, or sustainability, of the current / proposed agricultural business on this parcel of land. Also, given that some of the land is currently used for the storage of non-agricultural vehicles, it is far from certain that the proposed buildings would be used for the purpose stated in the planning application. As such, the proposal does not comply with the policies of the Stroud Local Plan or even permitted development requirements.

With regards to point 3, planning application S.19/2390/FUL states that the building would be used for animal feed / fodder and implements. However, given the current storage of non-agricultural vehicles on site, it is not certain that the building is actually being designed / built for agricultural purposes. As such, there is a risk that the proposed development does not comply with permitted development requirements in this regard, either.

¹³ <https://www.planningresource.co.uk/article/1209137/agricultural-buildings-g-section-221>