

**PIWG MEETING, 8 JANUARY 2019**  
**AGENDA ITEM 4 – REVIEW OF PIWG-RELATED WORK PROGRAMME**

**11 SEPTEMBER 2019 – 8 JANUARY 2020**

**Local Plans – 3 responses (in addition to the one commented on in April (Oxfordshire Plan 2050), so 4 in total in 2019/20)**

Stratford on Avon Site Allocations Plan (Publication Draft) – responded 20/09/19 ([link 1](#), [link 2](#), [link 3](#))

- Objected to ‘reserve’ allocations in AONB (85 dwellings across 3 settlements) and in AONB settlements but adjacent to the AONB boundary (347 dwellings across 4 settlements) – the allocations are based on unmet needs across the district, county and beyond + scale of proposed development in some AONB settlements is disproportionate + no assessment of major development.
  - Recommended that housing provision in AONB settlements (inc. adjacent to AONB boundary) should be based on robust evidence of need arising from within the settlements, etc.

Tewkesbury Borough Plan (Pre-submission) – responded 18/11/19 ([link](#))

- Objected to the proposed allocation in Winchcombe (80 dwellings): not sound – protrudes negatively into the landscape + not convincing evidence of need specific to Winchcombe.
  - Recommended that the allocation should not extend as far out as currently proposed.
- Ambiguous wording in policy on development in villages that aren’t in the settlement hierarchy.
- Positive = addressed some of our recommendations from the previous consultation (e.g. Landscape and Visual Sensitivity Study of AONB allocations and allocations in the setting of the AONB; assessed if AONB allocations constitute major development).

South Worcestershire Development Plan (Preferred Options) – responded 16/12/19 ([link](#))

- Objected to the proposed new allocations in Broadway (97 dwellings, or 162 including re-allocations) and Mitton (500 dwellings, or 1,000 including re-allocations) should be withdrawn: Broadway – lack of convincing evidence of need specific to the parish; Mitton – potential impact on tranquillity of AONB as a result of vehicle movements associated with the development).
- Positive = addressed some of our recommendations from the previous consultation (e.g. Landscape and Visual Sensitivity Study of AONB allocations and allocations in the setting of the AONB; AONB-specific Topic Paper), withdrew one potential allocation in Winchcombe, in line with our recommendation.
- Liaised with Malvern Hills AONB to share ideas / best practice and ensure consistent responses.

Didn’t respond to:

- Oxfordshire Cotswolds Garden Village / West of Eynsham SPD (Preferred Options)
- Worcestershire Minerals Local Plan (Publication Draft)
- Wiltshire Housing Site Allocations Plan (Further Main Modifications)
- Cheltenham Plan (Proposed Main Modifications)

- Gloucester City Plan (Pre-Submission consultation)

## Other Plans

Gloucestershire Local Transport Plan (ISA Scoping Technical Note - Sustainability Issues) – responded 7/10/19 ([link](#))

- Advised on the key consideration that should be taken into account when developing the Local Transport Plan.

## Planning Applications

S.18/2698/FUL (Stroud DC) – 31 new homes (inc. 16 affordable) as a Rural Exception Site (RES) - Chalford Hill: responded on 24/9/2019 ([link](#))

- Objected because: (i) no assessment as to whether the development constituted major development; didn't consider 51% affordable housing to be sufficient for a RES.
- The planning application was subsequently approved (so not in line with our recommendation) – the officer's report which came after our response took the view that the development did not constitute major development (which is probably a reasonable conclusion) and that the % of affordable housing was compatible with relevant Local Plan policies (which is probably true, but is not what we should be aspiring to in an AONB).

19/00722/FUL, 19/00723/FUL and 19/00724/FUL - New agricultural buildings, etc - Land at Berry Wormington, Stanton, Gloucestershire: responded on 22/11/2019 ([link](#))

- Comments only (not an objection): The Board had provided pre-application advice on an earlier version of this proposal. The new planning application was a significant improvement on the previous one, addressing all of the issues that we had raised in our pre-app advice and site visit. However, we concluded that the overall effect of the proposed developments on the Cotswolds AONB is still likely to be adverse, albeit relatively minor compared to the previous applications. Suggested that the net benefit depended on Tewkesbury BCs assessment of the need for the scheme,

S.19/2094/FUL (Stroud DC) - Material change of use of land from agriculture to the processing, seasoning, drying, storage, sale and supply of firewood (retrospective) - Lower Kilcote Farm, Hillesley: responded on 13/12/19 ([link](#))

- Objected due to potential impacts on the tranquillity of the AONB, not least because there would be multiple lorry movements on a quiet country lane, which forms part of the Cotswold Way National Trail, in a very tranquil part of the AONB.

## Position Statements

Planning papers for Exec (17/9/19) and Board (17/12/19)

## Miscellaneous

Chipping Norton HGV diversion

- See letters that Liz Eyre has sent to Warwickshire ([link](#)) and Oxfordshire ([link](#)).

## Noise pollution from major roads (inc. M5 at Upton St Leonards)

- Upton St Leonards PC contacted me during 2019, regarding their concerns about noise pollution from the adjacent M5. I met with their representatives on 21/11/19. I provisionally agreed that I would write to Highways England asking them to review and, if appropriate, address this issue. However, before doing so, I consulted PIWG + George Lambrick, Graham Hopkins and Norman Kay. This flagged up the need to consider the Upton St Leonard issue in the context of Important Noise Areas on major roads across the whole AONB.
  - **RECOMMENDATION (for discussion):** write to Highways England (at Chief Exec level?), raising the issue of Important Noise Areas in and adjacent to the AONB in the context of the Tranquillity Position Statement and prioritising the Upton St Leonards issue.

## A417

- Organised site visit for Board members on 1/10/19.
- Consultation response on preferred option (with significant input from A417 Working Group) – submitted on 8/11/19 ([link](#)) (+ papers to Exec and Board)

## Rail Corridor Enhancement Project

- Recruited Project Officer (Scott Brown) who I will be line managing – starting w/c 13/1/20.

## RTPI Presentation (September 2019)

- Positive feedback from attendees (via RTPI questionnaire / survey)

## CURRENT / UPCOMING WORKLOAD

### Local Plans

Stroud Local Plan (Draft Plan for Consultation) – deadline = 22/1/20

- Site allocation in:
  - Minchinhampton (PSO5 Tobacconist Rd - 80 dwellings):
    - Visual impact is low and impact on landscape character is relatively low.
    - AONB designation covers the whole settlement.
    - Housing Needs Survey for Minchinhampton Parish (2017) identified 24 households in need of affordable housing) – assuming 40% affordable housing provision then 80 dwellings wouldn't be unreasonable.
    - In 2011 census there were 2,406 households, so 80 dwellings represents a 3% increase.
    - If housing is to be allocated in Minchinhampton, this is probably the most suitable location.

- Key issue: scheme would require public access (on foot) across a Scheduled Monument (Banks and ditch at Glebe Farm) between the new housing and the playing field immediately to the west.
  - **Recommendation:** probably OK to accept this allocation if potential adverse impacts on the Scheduled Monument could be adequately addressed (potentially object if mitigation measures do not adequately address this issue).
- Nailsworth (PS07 North of Nympsfield Rd – 25 dwellings)
  - Visual impact probably quite low (as well screened from AONB side) and landscape character impact moderate? The field itself is quite representative of the AONB landscape character in this area but the adjacent urban fringe detracts from this to some degree (although this would potentially be enhanced if the football stadium is converted to well-designed housing in local vernacular architecture).
  - Quite small in the context of Nailsworth (although there is very little housing within the AONB section of Nailsworth parish) but potentially sets an unwelcome precedent by extending the urban area into the AONB (we have objected to even smaller proposals elsewhere that set a similar unwelcome precedent). Government guidance states that AONBs are '*unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas*'.
  - Housing Needs Survey for Nailsworth Parish (2013) identified 52 households in need of affordable housing so the amount of housing proposed for Nailsworth isn't unreasonable – data quite old though (beyond valid lifetime of HNS).
  - In 2011 census there were 2,673 households in Nailsworth, so 25 dwellings represents a 0.9% increase.
  - There is a nearby allocation for 80 dwellings (PS07) just outside the AONB boundary, on the site of a football stadium. Should this suffice for this locality, without taking forward PS07?
  - If housing was to be allocated in the AONB in Nailsworth Parish, this is probably the most suitable location.
    - **Recommendation:** object and ask Stroud DC for explanation of how they think the proposed allocation is compatible with the government guidance referred to above.
- Painswick (PS41 Washwell Fields – 20 dwellings):
  - Visual impact very low and landscape character impact relatively minor.
  - In 2011 census there were 1,546 households in Painswick, so 20 dwellings represents a 1.3% increase.
  - Rural Housing Needs Survey was undertaken in 2010 (identified 31 households in affordable housing need) – data no longer valid.
  - If housing was to be allocated in Painswick, this is probably the most suitable location.
    - **Recommendation:** no objection.
- The proposed allocations in the setting of the AONB that were of most concern (e.g. Dursley) have not been taken forward

Potential for multiple additional consultations but not 'live' at the moment.

**Additional Action:** Arrange meetings with relevant local authorities to discuss Local Plan and planning application consultation responses.

## Planning Applications

SDC.19CM023 (Warwickshire CC) - Infilling of redundant quarry with waste restoration to residential use - Edgehill Quarry: extended deadline = mid-January (not given a specific date)

- The landowner currently has planning permission to screen existing stockpiles of quarry overburden to produce secondary aggregate, with a maximum of 20 HGV movements per day.
- The proposed development would involve: locating a Materials Recycling Facility in the quarry void; importing over 0.5 million tonnes of inert waste over a six year period (of which 20% will be re-exported) to fill to pre-quarry ground levels; restore to a residential park home development comprising 29 residential park homes and six eco lodges for holiday lets.
- There is no restoration scheme currently in place without the current proposal being implemented.
- Applicant argues that the proposed restoration would enhance the landscape character in the longer term – don't necessarily agree with this as a redundant quarry could potentially be more in keeping with the landscape character than a residential park home development with 35 dwellings.
- Visual impact = low? (although photos don't provide wireframe of the proposed buildings).
- The unrestored quarry could potentially provide a good opportunity for calcareous grassland habitat creation (with an adjacent Wildlife Trust grassland site).
- CONCERNS: impact of importing, exporting and processing inert waste on the tranquillity of the AONB (albeit for just 6 years), including significant increase in HGV movements; residential park home development not consistent with landscape character.
- In the 2011 census Ratley and Upton Parish had 149 households; a development of 29 dwellings would represent a 19.5% increase in the number of dwellings (or 23% including the holiday homes) – not proportionate.
- Need to find out if there is an up-to-date Housing Needs Survey for
  - **Recommendation (subject to further assessment):** object based on impacts on tranquillity; waste facility not appropriate in AONB; inappropriateness of a residential park home development; not proportionate; lack of housing need specific to the parish and the AONB part of Stratford on Avon District)

P19/15308/F (South Gloucestershire Council) - Relevant demolition of 1 no. modern barn, 2 no. silos and 1 no. outbuilding. Erection of single storey rear extension to 1 no. barn (Short Barn) to facilitate conversion 4 no. barns to 9 no. dwellings. Erection of 8 no. dwellings, creation of access, with garages, landscaping and associated works – Hollybush Farm, Acton Turville, Badminton: deadline = 12/1/19 (potentially not enough time to respond)

- The Board provided pre-application advice, including a site visit, for this proposed development (as part of proposed larger development in Acton Turville) in 2018. In relation to Hollybush Farm, specifically, my comments that the time were as follows:
  - The visual impact of the proposed development at Hollybush Farmyard would be relatively small, given that much of this part of the development would use

existing buildings. Also, when seen from Burton Road, heading south out of the village, the existing buildings are below the level of Burton Road and, as such, do not obscure the view. The visual impact from Littleton Drew Road would also be minimal as features such as parking and services would be behind the street-front buildings.

- In 2011 census there were 160 households in Acton Turville Parish; 17 dwellings would represent a 10.6% increase (albeit that 9 of the 17 would be as part of a barn conversion).
- Need to find out if there is an up-to-date Housing Needs Survey.
  - **Recommendation:** need to assess the planning application in more details before deciding what the Board's stance should be.

### **Position Statements**

Guidance on factors to take into consideration in planning policy / development management.

Housing Position Statement

### **Miscellaneous**

A417

Rail Corridor Enhancement Project

Letter to Highways England re Important Noise Areas on major roads in and around the Cotswolds AONB, with particular reference to Upton St Leonards.