Installation of solar farm, associated infrastructure and grid connection cable run at Land at Grid Reference 401975 198339 Spratsgate Lane Siddington Cirencester Gloucestershire

Full Application 25/01623/FUL	
Applicant:	Aura Power Developments Ltd
Agent:	
Case Officer:	Martin Perks
Ward Member(s):	Councillor Mike Evemy
Committee Date:	13 May 2026
RECOMMENDATION:	**PERMIT subject to no objection from the Biodiversity Officer and the Environment Agency and the completion of a S106 legal agreement covering a Biodiversity Net Gain monitoring fee**

1. Main Issues:

(a) Provision of Renewable Energy
(b) Impact on the Character and Appearance of the Area
(c) Impact on the Setting of Heritage Assets
(d) Access and Highway Safety
(e) Impact on Residential Amenity & Glint and Glare
(f) Biodiversity
(g) Drainage and Flooding

2. Reasons for Referral:

2.1 This application has been referred to Planning and Licensing Committee as it falls into the major development category for the purposes of the Town and Country Planning (Development Management Procedure) (England) 2015.

3. Site Description:

3.1 This application relates primarily to a group of agricultural fields which are located to the east of the village of Ewen. The application fields are located approximately 350m from the aforementioned village at their closest point. The application site measures approximately 52 hectares in size and includes the aforementioned fields, as well as the site of a new substation, and the routes of a construction access road and an underground cable line. The main body of the site slopes gently downwards in a north-south direction. Land levels drop

approximately 5m across the site. It consists of a network of existing fields which are bordered by hedgerows. The southern part of the application site extends around an area of existing woodland measuring approximately 1.4 hectares in size.

3.2 The eastern boundary of the main body of the application site adjoins a Class C metalled highway (Spratsgate Lane). A native species hedgerow extends along the aforementioned site boundary. Agricultural fields lie to the east of Spratsgate Lane. The southern boundary of the site also extends alongside a Class C highway (Ewen Road). The aforementioned boundary is defined by a mix of hedgerows and trees. A farmhouse (Southleaze Farm) is located on the southern side of Ewen Road opposite the application site. A group of farm buildings and an outdoor caravan storage area lie to the south of the aforementioned dwelling. The site is bordered by agricultural fields to its west and north.

3.3 In addition to the above, the application site red line also includes a proposed cable route which would extend from the main body of the application site to an existing electricity substation located on Wilkinson Road on the southern outskirts of Cirencester, approximately 2km to the north of the proposed solar farm. The red line also includes the route of a proposed construction site access which would utilise an existing field entrance located off Spratsgate Lane approximately 180m to the north of the main part of the application site. The proposed construction road would run in a westerly direction for approximately 380m from the aforementioned entrance before heading southwards to the main body of the application site.

3.4 The application site also includes the south-eastern corner of an existing field which is located approximately 1.25km to the north of the proposed solar panels. The aforementioned location is bordered by Spratsgate Lane to the east and a metalled, un-marked road which extends from Spratsgate Lane to the village of Ewen to the south-west. This part of the site would house a substation/plant compound which would be accessed by an existing field entrance which opens to the road to the south.

3.5 The site is not subject to any specific landscape designation. The boundary of Kemble and Ewen Special Landscape Area (SLA) lies to the west and north-west of the application site. It is located approximately 340m from the application site at its closest point.

3.6 A number of Grade II listed buildings are located to the north of the application site. The listed buildings are 'Furzen Leaze Farmhouse', the 'Barn and Stable at

Furzen Lea Farmhouse' and a pair of cottages 'Furzen Leaze Cottages'. The Barn and Stables and Furzen Leaze Farmhouse are located approximately 350m and 400m to the north of the main body of the application site respectively. Furzen Leaze Cottages are located approximately 550m to the north of the main body of the application site.

3.7 The site is located approximately 590m to the east of Ewen Conservation Area.

3.8 The 'Settlement South East of Chesterton Farm' Scheduled Ancient Monument (SAM) is located approximately 1.4km to the north of the main body of the application site. The proposed cable route is located approximately 450m to the east of the SAM at its closest point.

3.9 The majority of the application site is located within Flood Zone 1. A section of the central part of the main body of the site falls within Flood Zones 2 and 3. The aforementioned area is linear in form and extends in a roughly north-south direction alongside an existing drainage ditch. In addition, a section of the proposed cable route lying approximately 600m to the north of the application site crosses an area of land classified as falling within Flood Zones 2 and 3.

3.10 Public Right of War BSN7 runs in an east-west direction approximately 370m to the north of the main body of the application site.

3.11 The Cotswold Water Park Site of Special Scientific Interest (SSSI) is located approximately 450m to the east of the main body of the application site at its closest point.

3.12 The central and eastern parts of the main body of the application site are located within Siddington parish. The 2 westernmost fields are located within Kemble and Ewen parish.

4. Relevant Planning History:

None

5. Planning Policies:

- INF10 Renewable & Low Carbon Energy Develop't
- EN1 Built, Natural & Historic Environment
- EN2 Design of Built & Natural Environment
- EN4 The Wider Natural & Historic Landscape
- EN7 Trees, Hedgerows & Woodlands
- EN8 Bio & Geo: Features Habitats & Species

- EN14 Managing Flood Risk
- EN15 Pollution & Contaminated Land
- INF3 Sustainable Transport
- INF4 Highway Safety
- INF5 Parking Provision
- INF7 Green Infrastructure

6. Observations of Consultees:

6.1 Gloucestershire County Council Highways: No objection

6.2 Gloucestershire County Council Lead Local Flood Authority: No objection subject to condition.

6.3 Gloucestershire County Council Archaeology: No objection subject to conditions

6.4 Biodiversity Officer: Further information required.

6.5 Landscape Consultant: No objection subject to conditions

6.6 Tree Officer: No objection

6.7 Environmental and Regulatory Services Noise: Comments incorporated into report.

6.8 Environment Agency: Awaiting response in relation to updated Flood Risk Assessment.

6.9 Natural England: No objection subject to conditions.

6.10 Historic England: *'Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application.'*

6.11 Civil Aviation Authority: No response to date.

6.12 Ministry of Defence: *'Following review of the application documents, the proposed development would be considered to have no detrimental impact on the operation or capability of a defence site or asset. The MOD has no objection to the development proposed.'*

6.13 Cotswold Airport: No response to date.

7. View of Parish Councils:

7.1 **Siddington Parish Council**

No response to date.

7.2 **Kemble and Ewen Parish Council**

'Customer made comments in support of the Planning Application'

8. Other Representations:

8.1 Approximately 6 objections, 68 support and 1 general comments received.

8.2 **Main grounds of objection are:**

i) We have lived in the village for approximately 20 years enjoying the open countryside surroundings of a village location. We are supportive of renewable energy projects and as a nation becoming more energy independent and less reliant on fossil fuels; however this renewable roll out needs allocated on suitable, appropriate and ideally brownfield locations and certainly not in open countryside causing lasting negative landscape and visual impact and loss of quality agriculture land. This proposed development is certainly not suitable both in scale and setting within its surroundings.

ii) Negative visual impact on landscape and visual amenity significantly changing the character of the rural area.

iii) Loss of good quality agricultural land, and importance to maintain good quality land for food production, food security and biodiversity. Under Planning Guidance priority should given to less fertile or brownfield sites for solar development. As stated earlier, if consented, this will be the 3rd solar farm within three miles of each other, resulting in a total loss of approximately 450 acres of farm land in open countryside.

iv) In the Applicants' Agricultural Land Classification and Land Holding Assessment in Para 3.5.1 it states that over 20% of the application site is graded as "good to very good". In Figure 2 below, please note that the best Graded land is located in the protruding finger of land closest to the village of Ewen. This further emphasises our earlier statement that this plot of land should be

removed from the application. When this farmland was sold to the current owner in 2022, it was explicitly marketed as "100 acres of Grade 1 agricultural land," with the soils described as being "in good heart" in the sales brochure.

v) Cultural heritage and historical impact on the Listed Buildings. The proposed development is in direct sight of Listed Buildings and will cause harm to the historic environment. We noted that in the Applicant's proposals results are assessed as "causing an appreciable change to identifiable character to the setting of three designated assets in the form of Furzen Leaze Farmhouse, Furzen Leaze barn and stable complex and Furzen Leaze Cottage".

vi) I see from the initial map that it is intended that the connection to the grid passes under the road for much of its length. We in Somerford Keynes are fed up with all the digging of the highway and constant delays that look likely to continue for some years. For much of its length the cable could easily pass under the land owned by the current owner. Please ensure that with this and other applications that the cables and pipes are kept away from the public highway wherever possible.

vii) Flooding - Although this land is in the Parish of Siddington, it will not affect Siddington but it will have a detrimental effect on the hamlet of Shorncote, which is where all the excess water run off ends up. Last November, we had a storm and the Ewen/spratsgate lane crossroads was impassable with over two feet of water. This water finds its way down the road and into the Ewen drain which then runs eastwards across my land. The drain could not cope and burst its banks all the way along my land to the quarry. We also had a torrential river running down the single track road, about 4 foot deep in places (a car got stuck there.) 10 properties were badly flooded. A lot of this water came off the land included in this planning application. If it is covered in solar panels, this will hugely exacerbate the risk of flooding. The rain will not fall equally over the land but in concentrated lines and will not be absorbed. It would be disastrous for Shorncote on a regular basis.

viii) Suitability of the land - This land was sold in 2022 by Moore Allen. It was sold as lot 1, which was a total of 432 acres. About one quarter of this land was classified as grade 1; it is all described as..... being in arable production apart from the gardens and woodland. 'On the soil survey plan the soils are shown as mainly Elmton 2 series, comprising productive limestone loamy soils. The soils are in good heart.' This does not sound like the type of ground on which to put a solar farm. It is good, productive arable land. We all want to try to produce cleaner electricity, but why use excellent farmland? There must be more suitable sites.

ix) The height and size of the panels. The panels are apparently going to be 3.5m high. They are going to be an eyesore to anyone living close by. There doesn't seem to be much provision for screening. They will be particularly close to the Timbrell's farmhouse. The hedges will need to be thicker and higher. A high bund would help to hide the glare from the panels affecting motorists and nearby residents. They will be seen from miles around otherwise. If planning is approved, it would be good to leave a 20/30 metre strip between the perimeter hedge and the start of the panels.

x) Inverters - I do not know if the inverters emit any sounds but it would be sensible to have them set away from the outer boundaries, so they do not disturb residents.

xi) I have lived near the site for 22 years, during which I have enjoyed the undisturbed surrounding open countryside. Whilst I am strongly supportive of renewable energy it should not be at any cost, particularly in cases of over development of solar farms in a small area of open countryside such as Ewen.

xii) The general principle of need requires to be carefully weighed against the potential adverse effects of harm arising.

xiii) The proposal would have a significant adverse visual impact and severely harm the character and appearance of this scenic rural area. The solar farm will be visible from at least 12 neighbouring properties. It will also be visible from two rural village roads which currently display a broad, unobstructed view of the Cotswold rural landscape. The proposed solar panels would undoubtedly form a most striking dominant feature of the visible landscape, and the proposed scheme of screening would do little to ameliorate this harmful impact, particularly during the winter and autumn.

xiv) Adverse cumulative impact and overdevelopment of solar farms in this area. There already exists the development of 2 solar farms at Siddington and Kemble Wick. To develop another solar farm on the proposed site between these two in such a small area of countryside is, regardless of need, over industrialisation and over development. The CDC area covers 450 square miles, yet there would be 3 solar farms clustered around the small village of Ewen.

xv) The developer could easily remove the unnecessary western rectangular protrusion which causes the greatest visual harm to the largest number of impacted houses in the village.

xvi) A period of 40 years does not constitute temporary. Appeal decisions indicate that solar development would be perceived as a permanent rather than a temporary feature within the landscape, and that little weight be given to the aspect of the potential reversibility of the proposal in landscape and visual terms.

xvii) I don't support solar farms, as they are unsightly. Nuclear is more practical (& hydro electric).

xviii) Impact on Landscape Character and Visual Amenity. The site at Spratsgate Lane sits within open countryside that contributes to the characteristic lowland Cotswold landscape and the setting of nearby villages. The introduction of extensive solar arrays, security fencing, inverter stations, and associated infrastructure would urbanise and industrialise what is currently a predominantly undeveloped and tranquil landscape. The site's openness means the development is likely to be visible from surrounding public rights of way and nearby properties, leading to a significant and harmful visual impact.

xix) Harm to the Setting of the Cotswolds National Landscape (AONB)

xx) Proximity to the Cotswold Water Park and SSSI Designations. There is a credible risk of indirect impacts, including alteration of local hydrology affecting connected lakes, wetlands, and drainage systems, disturbance to sensitive bird species, particularly during construction phases and through ongoing operational activity , disruption of ecological connectivity between farmland and designated conservation areas.

xxi) Loss of Agricultural Land

xxii) Traffic and Access via Rural Lanes

xxiii) The siting of this development in this location raises concerns about incremental industrialisation of the rural landscape. Approval may set a precedent for further similar proposals in the area, particularly given the availability of relatively flat agricultural land. The cumulative impact of multiple solar developments could fundamentally alter the character of this part of the Cotswolds.

xxiv) Given the sensitivity of this location-close to protected landscapes, ecologically important areas, and rural communities- there is a strong case that alternative sites should be prioritised. Brownfield land, previously developed

sites, or large-scale rooftop installations would provide renewable energy benefits without the same level of environmental and landscape harm.

8.3 **Main grounds of support are:**

i) My family and I have lived in listed Farmhouse building since 2023. As the farmhouse been referenced in other comments on this planning application we feel it appropriate for us to comment. For the avoidance of doubt, although we live on Furzen Leaze Farm in the listed farmhouse, we do not have anything to do with the proposed solar farm and it is not on our land. With the caveat that the developer needs to accommodate the needs of directly affected resident's (in our case this is mainly during construction re: noise and dust) - we support this development.

ii) These fields have always struggled to make a profit and have had to be intensively farmed for many years. As a result, there has been a declining soil health year-after-year and a notable drop in biodiversity. The land needs resting for many years in order to recover. In our view, the best thing that can happen to this land is to find a profitable way to put it to back to nature/wild-flowers for a while, have a no-pesticides policy, graze it with sheep as/when needed and provide the sheep, birds, bugs and general nature with bit of shade from the increasingly hot days. Solar panels seems to be an ideal way to fund the regeneration of biodiversity - but with the caveat that whenever the panels do get removed in the future, provisions are made to ensure the deconstruction does not contaminate the soil.

iii) Support our farmers to make a profit from their lower quality land so they can pay for the work needed on their higher quality land. The proposed solar farm site is almost all relatively low quality/low profit farmland. The campaign 'no farmers, no food' includes the farmers right to make the best use of the land in order to subsidies the farming operation. If it was great quality farmland which allowed them to make a regular profit, then they would still be farming it. But it isn't. We need to support those who are genuinely farming - by allowing them to diversify and make a profit when farming. -If this land wasn't used for solar, then we wouldn't be surprised if it was used for housing. The solar/biodiversity increase combo seems like a better use for this land.

iv) Raises money for the local council and local community. Currently, this agricultural land is exempt from paying business rates. Once it is generating electricity, it will be paying an extra £50k+ per year to our local council and this will help fund our local services and local community.

v) Little to no effect on the setting of the listed buildings. Potentially, these solar panels will affect the view from the listed building where we live, however it is fairly straight-forward to screen them and if we see some of the sheep-adorned solar panels in the winter then that's fine by us - we would see that as a fair trade-off for the biodiversity gains. And if we had to choose between infertile fields, new-build houses or a solar farm full of sheep - we would definitely choose the solar farm full of sheep.

vi) This gives a chance for the developer to fix potential issues with drainage around the site (if there are any).

vii) All of the above is caveated with the developer needing to do their best to accommodate all resident's needs (not just ours), but in summary: we support this application due to the gain in biodiversity, the contribution towards farming profitability, the good use of the land (I can't think of any better & profitable uses of this land) and extra council/community funding.

viii) As long as the landscaping promises are kept, I think it's a good idea.

ix) I am happy with solar energy (it's housing that is my concern - there is overdevelopment). The landscaping is welcome and important - I like the rural atmosphere.

x) I welcome support for wildlife.

xi) Traffic must be managed properly during construction.

xii) We must be pragmatic about our energy mix. We need to complement wind, nuclear, etc. Recent events remind us we need energy security.

xiii) Supportive of clean energy.

xiv) It will help to bring bills down.

8.4 **General comments are:**

i) Aura Power has publicly indicated that a Community Benefit Fund (CBF) will be provided in connection with this scheme. If the developer considers it necessary to appoint an external administrator, I am currently informed that GrantScape is being considered—though this has not, to my knowledge, been formally confirmed in any planning documentation. Similarly, it appears no written agreement is yet in place. The same developer's other project at Kemble

Wick, due to begin operation in 2025, remains - to date - without a concluded CBF arrangement, despite earlier assurances.While I fully recognise that CBFs are not material planning considerations and cannot be secured through planning conditions or obligations, I do believe there is value - in terms of community confidence and transparency - in ensuring that any such fund is clearly defined and agreed before determination. In this case, the absence of a timetable or draft framework risks creating uncertainty about how local community benefit will be realised in practice.

ii) Aura has emphasised its long-term involvement with the site, and while I appreciate the intention to deliver a meaningful CBF, the use of external administrators may reduce direct accountability over time. An early, written agreement - even one separate from the planning process - would help address these concerns. By way of precedent, Siddington Parish Council previously negotiated and received an upfront CBF payment of £80,000 from a different solar developer for a similar-scale scheme. That arrangement, though outside the planning process, helped foster community support and provided a clear, locally controlled outcome.

iii) I therefore respectfully encourage the planning authority to invite the applicant to clarify its proposed CBF arrangements ahead of determination. Such clarity could be included in a non-material informative or addressed via a separate undertaking, as appropriate. This would help ensure that the community sees tangible, timely benefit from the scheme, and maintain trust in the process.

8.5 **South Cerney Parish Council**

8.5.1. 'South Cerney Parish Council wishes to echo the comment by Gloucestershire Wildlife Trust calling for a thirty-year Habitat Management and Monitoring Plan for the site.'

and *'South Cerney Parish Council wishes to make the following comments:*

8.5.2 The Parish Council wishes to echo the comments made by the Environment Agency in that the flood risk assessment is non-compliant.

8.5.3 The proposed panels appear to be too close to existing hedges (3.5m) instead of the usual 20m in as other applications.

8.5.4 It has not been demonstrated that the bio-diversity net gain would be increased by 10%.

8.5.5 The land mitigation strategy / land management plan is poor, not referring to dead Ash trees or new hedging.'

8.6 **Cirencester Town Council**

' Although this site lies within an adjoining Parish, CTC is pleased to comment and supports the installation of a solar farm, associated infrastructure, ancillary battery storage units and grid connection cable run at this site. The site comprises largely Grade 4 agricultural land (with smaller areas of lower grade 3 land), appropriate for this kind of development under NPPF and it includes a comprehensive proposal to achieve 61.63% net gain for habitats and 11.62% net gain for hedgerows, well above the statutory requirement. Further, CTC supports recommendations made by the Gloucestershire Wildlife Trust regarding conditions to be attached to any consent. CTC notes the solar farm is proposed to be operational for a temporary period of 40 years and welcomes the fact that after this the equipment would be removed and the land reinstated to its current use.'

8.7 **Somerford Keynes Parish Council**

8.7.1 ' The Somerford Keynes Parish Council (SKPC) met on the 14/07/25 and voted unanimously to object to this application, having reviewed the application, the objection submitted by Andrew Timbrell, and having discussed the application with Harry Timbrell and Marcia Timbrell at the meeting.

8.7.2 It is worth noting that the Timbrell family have been farmers in Somerford Keynes Parish for several generations. They are extremely valued members of our community. They farm much of the land around Somerford Keynes using regenerative methods that are better both for the environment and wildlife. The Timbrells maintain their own and others' hedges to support wildlife, and they maintain their ditches in an exemplary manner, which is extremely important for the parish's surface water drainage system, and to minimise flooding.

8.7.3 While the SKPC supports renewal energy in principle, and recognizes the need for rapid action to net zero carbon, we trust that the planning office will give the Furzen Leaze solar farm application critical and careful consideration. In particular, we hope the council's concerns, as outlined below, will be taken into account.

8.7.4 In the event that the development is approved, we have noted several mitigation measures that would lessen the impacts of the solar farm on

neighbours and road uses, and we hope these measures will be required as a condition of approval

8.7.5 Concerns:

1. Land Classification

A main cause for concern is the high quality of the land that will be used for this project. We have obtained sales particulars from the agents, Moore Allen and Innocent, in Cirencester. When the Furzen Leaze land was recently sold, of the 432 acres which constituted Lot 1, 418 acres were in arable production, with 100 acres in the northern part of the land being Grade 1 land. While we understand that the Grade 1 land is not included in the solar farm application, the remainder is good quality Grade 3 land, and most likely is Grade 3A because it has been used in recent years to grow potatoes. Having grade 3A adjacent to Grade 1 land is a rarity, and makes it very valuable for agriculture. The council feels it is a complete waste of really good farming land to use it for a solar farm.

2. Flood Risk

Another main cause for concern is how the solar farm will create more frequent and worse flooding in our parish. We are aware that the drains in the Furzen Leaze fields do not work well already. The neighbouring village of Shorncote flooded very badly as recently as November 2024, when runoff from these fields ran into the Ewen ditch. This ditch then burst its banks and flooded the village really badly. The solar farm will exacerbate this problem, as the panels will concentrate runoff, reduce rain water infiltration into the ground, and thus runoff will be faster, more channelled and intense.

3. Visual Impact, Glint and Glare

The council is also very concerned about that the panels, being 3.5 meters tall, are going to be visible from miles around and their reflection (glint and glare) will be seen from the adjacent roads, potentially causing accidents. We do not think that that the developer's proposed remedies will be effective year-round, and we feel that they will be inadequate overall.

4. Proximity of the development to Southleaze Farm.

The council feels that the developer has ignored and/or seriously downplayed the impacts that the solar farm will have on its nearest neighbour, Southleaze Farm. We feel this is unfair and unacceptable

8.7.6 Mitigation (if development is approved)

If, despite objections, the application does gain approval, there are several areas of mitigation that the SKPC feels are highly warranted, as follows:

a. Due to the existing poor drainage of the land, during construction extra precautions should be taken to avoid exacerbating flooding beyond that already experienced.

b. New field drains should be installed to better drain the fields within the solar farm, and caution should be taken not to damage any existing field drains.

c. Hedgerows along the boundaries of the development and along roadside should be allowed to grow to at least 3.5 meters tall (the height of the panels) and the sides of the hedges should be trimmed in such a way as to ensure thickness and density. Earth bunds should be added in critical locations to block solar farm visibility.

d. The developer should be required to address the amount of ash dieback present in the hedges, and expected future dieback, and to carry out remedial planting in advance of the ash trees dying and creating new gaps in the hedging. Existing gaps in hedging should be addressed as a first step.

e. The developer should acknowledge that they have no control over the poplar tree plantation that they say will provide screening, and they should be required to provide effective vegetative screening well before the plantation is felled or the plantation trees reach the end of their lifespans.

f. The proposed solar panels located alongside the site boundaries parallel to Ewen Road and Spratsgate Lane should be pushed back significantly from the boundary (and the road) to reduce glint and glare impacts on traffic using these roads, and to lessen the overall impact on Southleaze Farm. This would benefit the solar farm, because if the vegetation screening will be as effective as the proponents have stated, an additional setback will help avoid shading and maximise sunlight capture by the nearest panels.

g. Noise during construction should be mitigated, and noise from the operation of the solar farm, in the form of humming of inverters, should be reduced by making sure that inverters are only installed well away, i.e. 100 yards away, from habitation, including the nearest neighbour, Southleaze Farm.

The SKPC hope that mitigation measures are required during construction (when most achievable), and that mitigation measures are maintained during the operational life of the solar farm.'

8.8 **Gloucestershire Wildlife Trust**

'Biodiversity Net Gain (BNG)

8.8.1 The proposed 61.63% net gain for habitats and 11.62% net gain for hedgerows, to be delivered entirely on-site, is strongly supported by GWT. This represents a strong outcome in biodiversity terms, well above the statutory requirement.

8.8.2 Key proposals include:

- *Conversion of arable fields to species-rich grassland across and between the array rows*
- *Over 500m of new hedgerow planting with enhancement of existing hedgerows*
- *Creation of wildflower margins, improving ecological connectivity with Woodland Core Habitat (Fox Covert) and the wider landscape*

8.8.3 Given the site's identification as a Wetland Opportunity Area within the NRN, we would also encourage the applicant and local planning authority to explore opportunities for inclusion of wetland features or damp grassland areas over the lifetime of the project.

8.8.4 However, GWT notes that no formal 30-year Habitat Management and Monitoring Plan has been submitted. For a project of this scale, it is critical that a full plan is secured by condition. This should clearly set out:

- *Detailed management prescriptions for all habitat areas*
- *Timetables for establishment and ongoing works*
- *Monitoring methods, success criteria and reporting frequency*
- *Adaptive management mechanisms, to ensure delivery of the BNG trajectory Protected and Priority Species*

8.8.5 We are satisfied that appropriate survey effort has been undertaken for key species groups, including amphibians, birds, bats, badgers, and reptiles. We note that skylark territories have been recorded within the site. The principle of skylark mitigation is accepted — however, we would recommend that this is finalised prior to construction, with provision of either:

- *Dedicated skylark plots (bare ground or short sward areas), or*
- *Appropriately phased and varied grassland management to maintain suitable nesting opportunities.*

8.8.6 We also welcome measures proposed for hedgehogs and reptiles, and the maintenance of habitat permeability for bats and other species through fencing design and new planting.

Glare Impacts on Wildlife

8.8.7 While a Glint and Glare Study has been submitted, it addresses only aviation, highways, and human visual receptors. It does not assess potential impacts on wildlife receptors, particularly:

- *Foraging and flight paths of breeding and wintering birds*
- *Bats using the network of hedgerows and nearby woodland edges*
- *Nocturnal invertebrates*

8.8.8 Given the site's location within 0.5 km of the Cotswold Water Park SSSI (with known importance for waterfowl) and the documented presence of a range of birds within the site, GWT considers that a targeted ecological review of potential glint/glare effects should be secured by condition. If required, mitigation could then be incorporated into panel alignment or habitat design

CEMP Requirement

8.8.9 No full Construction Environmental Management Plan (CEMP) has been submitted with this application.

Given the following factors:

- *Presence of an active badger sett*
- *Proximity to SSSI and NRN habitats*
- *Confirmed populations of protected and priority species*
- *The scale and extent of groundworks required (arrays, battery units, grid connection cable run).*
- *It is essential that a detailed CEMP be prepared and approved prior to commencement. This should cover:*
- *Species protection measures during construction*
- *Soil handling, compaction prevention and restoration*
- *Pollution control and water management*

- *Lighting strategy for the construction phase*
- *Post-construction habitat establishment and aftercare, integrated with the BNG Plan*

Trees, Hedgerows, and Soils

8.8.10 Tree and hedgerow losses are minimal and are well-compensated through proposed planting. The site consists largely of Grade 4 agricultural land (with smaller areas of lower grade 3 land), which is appropriate for this form of development under national planning policy.

8.8.11 We also welcome the applicant's commitments to soil health improvement and reversible land management — which are important to securing long-term sustainability and future land-use options

Recommendations

8.8.12 We recommend the following conditions be attached to any consent:

1. Delivery of the BNG Plan and 30-year Habitat Management Plan

2. Final skylark mitigation agreed and secured

3. Ecological review of glint/glare impacts on wildlife, with mitigation incorporated as necessary

4. Submission and approval of full CEMP prior to commencement

5. Bat- and dormouse-sensitive lighting strategy, consistent with BCT/ILP guidance

6. Soil management and restoration measures captured within the CEMP.'

9. Applicant's Supporting Information:

- Biodiversity Net Gain Statement
- Ecological Impact Assessment
- Flood Risk Assessment and Drainage Strategy
- Surface Water Management Plan
- Heritage Impact Assessment
- Landscape and Visual Impact Assessment
- Magnetometer Survey Report

- Noise Impact Assessment
- Solar Photovoltaic Glint and Glare Study
- Arboricultural Impact Assessment
- Health and Safety Executive Report
- Planning Design and Access Statement
- Agricultural Land Classification:
- Transport Statement
- Overplanting Statement
- Geo-physical Survey Report
- Ecological Impact Assessment
- Archaeological Evaluation Report
- Statement on the grid connection and need for solar

10. Officer's Assessment:

Proposed Development

10.1 This application seeks planning permission for the creation of a 25MW solar farm and associated development, including the creation of a cable route linking the site to an existing electricity substation located on Wilkinson Road on the southern edge of Cirencester. The application site measures approximately 52 hectares in size and consists primarily of a group of existing agricultural fields. The majority of the cable route would extend through fields running along the western side of Spratsgate Lane before extending under the highway on the southern edge of Cirencester.

10.2 The applicant's Planning Statement states the following:

'The following elements will be included in the development:

- *Tracker photovoltaic panels (providing 63,392 panels in total);*
- *75no. inverters: to enable the direct current (DC) generated by the panels to be converted to alternating current (AC) electricity;*
- *10no. transformers: to increase the generated electricity;*
- *1no. DNO control room;*
- *1no. Customer switch room;*
- *Internal cable connections: electric cabling either mounted on the back of the panels or underground across the site;*
- *Internal access tracks;*
- *Access works;*
- *Perimeter fencing;*
- *Tree planting;*

- *Native hedgerow planting.'*

10.3 The proposed solar panels would be arranged in rows across the application site. The top of each panel would be approximately 3.5m above ground level at its steepest elevation, with the bottom of each panel being approximately 0.5m above the ground. The elevation of the solar panels would vary during the course of the day as the panels track the sun. The 3.5m measurement is therefore a maximum height.

10.4 In addition to the proposed solar panels, the submitted scheme also includes the installation/siting of number of associated buildings housing transformers, inverters, switch rooms and associated equipment. The aforementioned buildings generally take the form of functional metal clad structures which range from approximately 3m to 4m in height. A compound containing battery storage units would be located adjacent to the eastern boundary of the site.

10.5 It is proposed to erect a 2m high deer proof fence around the site of the solar panels. It is also proposed to erect 4m high CCTV columns around the edge of the application site.

10.6 The proposed cable route would extend under fields and part of a highway. The cable trenches would extend to a depth of approximately 1.5m under the fields and 1.2m under the highway, The top of the cables would be approximately 1.1m and 0.9m respectively below ground level. The cable route would measure approximately 0.5m in width. The trenches would be backfilled and surfaced to match their surroundings once the cables were in place.

10.7 The proposed solar farm would be accessed via an existing field entrance which opens onto an existing lay-by lying alongside the western side of Spratsgate Lane. A new access track would be created from the aforementioned access point to the main body of the solar farm site. It would be surfaced in gravel/crushed stone and measure approximately 5m in width. It would extend approximately 380m to the west of Spratsgate Lane before extending southwards to the application site.

10.8 The scheme also includes the creation of a substation compound in the south-eastern corner of an existing field located approximately 1.25km to the north of the proposed solar panels. The site is bordered by Spratsgate Lane to the east and by a metalled road leading to the village of Ewen to the south. The compound would be accessed via an existing field entrance located approximately 100m to the south-west of the proposed compound. A stone surfaced track would link the substation site to the existing highway.

10.9 The solar farm would have an operational period of 40 years. At the end of the aforementioned period the solar panels and associated equipment would be removed from the site and the land reinstated to its current use.

10.10 It is noted that planning permission has been granted for 4 other solar farms within the vicinity of the application site. The respective developments are:

10.10.1 13/03656/FUL Construction of a 15.5 MW Solar Farm and ancillary development, Crucis Park, Barnsley Road, Ampney Crucis. Permitted 2013

10.10.2 15/01923/FUL Proposed development of solar photovoltaic modules including access, temporary construction compound; single and double inverter platforms; transfer station; collecting station; security fencing; CCTV cameras and poles; landscaping; and associated works and infrastructure including underground cable along London Road verge and Witpit Lane verge and related equipment to allow connection to the electricity distribution network, Land Parcel East Of Witpit Lane, Preston. Permitted 2015

10.10.3 20/04499/FUL Construction of a temporary 19.94MW Solar Farm, to include the installation of Solar Panels with transformers, a DNO substation, customer substation, security fence, landscaping and other associated infrastructure (including a temporary construction access point), Ashton Road, Siddington. Permitted 2021

10.10.4 21/02735/FUL Installation of a solar farm comprising an array of ground mounted solar PV panels with associated infrastructure including housing for inverters, transformers and electrical equipment, a substation compound, fencing, security cameras, access tracks, associated landscaping and cabling for grid route of approx. 7.9 kilometres in length. Land At Grid Reference 398111 195688, Kemble Wick, Kemble. Permitted 2022

10.11 The site at Ampney Crucis measures approximately 34 hectares in size. It is currently operational. It is located approximately 6km to the north-east of the solar farm now proposed.

10.12 The site at Preston measures approximately 45.5 hectares in size and was projected to be capable of generating up to 23.38MW of electricity. It is currently operational. It is located approximately 4km to the north-east of the solar farm now proposed.

10.13 The site at Siddington measures approximately 32 hectares in size and lies adjacent to the southern edge of the aforementioned village. It is currently

operational and is located approximately 1.1km to the north-east of the solar farm now proposed.

10.14 The Kemble Wick site extends to an area of approximately 72.81 ha with approximately 19.78 ha in Wiltshire and 53.03 ha in Cotswold District. In addition to the area occupied by the solar farm, it is also proposed to lay underground cables for a length of approximately 7.9km between the solar farm and the southern edge of Cirencester (at the south-western end of Wilkinson Road). The approved development is predicted to have a generation capacity of up to 49.9 Megawatts. The scheme is under construction and is located approximately 3.7m km to the south-west of the solar farm now proposed.

Development Plan

10.15 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that *'If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.'* The starting point for the determination of this application is therefore the current development plan for the District which is the Cotswold District Local Plan 2011-2031. In addition, the 2 fields forming the western part of the main body of the application site are located within Kemble and Ewen parish. Development on the respective fields is therefore also subject to the Kemble and Ewen Neighbourhood Development Plan 2020-2031.

10.16 It is noted that policies in the current National Planning Policy Framework (NPPF) (December 2024) represent a significant material consideration when assessing this application. It is also noted that the Government published a new draft version of the National Planning Policy Framework (NPPF) for consultation on the 16th December 2025. The consultation period for the aforementioned document expires on the 10th March 2026 and it is anticipated that a final version of the new NPPF will be released in Summer 2026. Whilst the draft NPPF is a consultation document, it is considered that the proposed policies within it are a material consideration and must be given a degree of weight at the present time. The relevant draft policies will be referred to in this report in addition to those policies in the existing NPPF.

(a) Provision of Renewable Energy

10.17 The proposed development is intended to provide a renewable source of electricity generation and to reduce dependence on fossil fuels thereby reducing greenhouse gas emissions.

10.18 In considering this application, it is necessary to have regard to the UK Government's recent commitment to cut greenhouse gas emissions by 100% relative to 1990 levels by 2050. In June 2019, parliament passed legislation (Climate Change Act 2008 (2050 Target Amendment) Order 2019) to ensure that the commitment to achieve 'net zero' is legally binding. The need to reduce dependence on fossil fuels has therefore been recognised at a national level.

10.19 In July 2019, Cotswold District Council declared a climate emergency. It is committed to making its activities net zero by 2045, achieving 100% clean energy uses across a full range of functions by 2030 and embedding climate change emergency considerations in all work areas, decision making processes, policies and strategies.

10.20 With regard to planning policy and guidance, the following is considered relevant to this application:

10.21 Cotswold District Local Plan Policy INF10: Renewable and Low Carbon Energy Development states:

1.Proposals for the generation of energy from renewable or low carbon sources will be permitted, provided it is demonstrated that:

a. any adverse impacts individually and/or cumulatively, including; visual amenity; landscape character; heritage assets; biodiversity, water quality and flood risk; highways, residential amenity, including shadow flicker, air quality and noise, are or can be satisfactorily mitigated.

b. It is of an appropriate type, scale and design for the location and setting;

c. It is compatible with surrounding land uses, such as military activities; and

d. It avoids using the best and most versatile agricultural land unless justified by compelling evidence.

2.The infrastructure and all associated apparatus and structures relating to the installation must be removed, and the site reinstated where appropriate, should it become redundant for energy generation purposes.

10.22 In terms of national guidance, paragraph 7 of the National Planning Policy Framework (NPPF) states that the *'The purpose of the planning system is to*

contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.'

10.23 With regard to meeting the challenge of climate change, paragraph 161 of the NPPF states that *'the planning system should support the transition to net zero by 2050 and take full account of all climate impacts …'* It goes on to state that planning *'should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings, and support renewable and low carbon energy and associated infrastructure.'*

10.24 Paragraph 168 of the NPPF states:

'When determining planning applications for all forms of renewable and low carbon energy developments, local planning authorities should:

a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future;

b) recognise that small-scale and community-led projects provide a valuable contribution to cutting greenhouse emissions;

10.25 Draft NPPF Policy W3: Renewable and low carbon energy development and electricity network infrastructure states:

1. In considering proposals for renewable and low carbon energy development and electricity network infrastructure, substantial weight should be given to:

a. The benefits of such development for improving energy security, supporting economic development and moving to a net zero future;…

2. Applicant should not be required to demonstrate the need for renewable or low carbon energy development and electricity network infrastructure. Where proposals for this form of development come forward outside areas which have been identified as suitable for them they should be acceptable when assessed against the national decision-making policies in this Framework, taken as a whole.

3. Where development is expected to be time-limited, applications should be accompanied by proposals for decommissioning and site restoration, including details of how these measures are expected to be implemented.'

10.26 The Government's Planning Practice Guidance (PPG) states:

'Increasing the amount of energy from renewable and low carbon technologies will help to make sure the UK has a secure energy supply, reduce greenhouse gas emissions to slow down climate change and stimulate investment in new jobs and businesses. Planning has an important role in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable.

Paragraph: 001 Reference ID: 5-001-20140306'

10.27 It is evident that national and local planning policy and guidance are supportive, in principle, of renewable and low carbon energy development. With regard to this application, information submitted with the planning application states that *The Proposed Development, with an installed capacity of some 25MW would have an estimated power output of some 44,244MWh per annum, which would provide sufficient electricity to power over 15,000 homes.'* The current proposal will therefore make a significant contribution to the supply of renewable energy to the local area.

10.28 It is considered that the provision of renewable energy of the scale proposed represents a significant benefit that weighs in favour of the proposed scheme. Notwithstanding this, it is necessary to weigh this benefit against the potential impacts of the scheme. The impacts of the proposal will be covered in the following sections of this report.

(b) Impact on the Character and Appearance of the Area

10.29 The application site occupies an area of open countryside to the east of the village of Ewen and to the south-west of the village of Siddington. The area proposed for the solar panels forms part of a network of agricultural fields, with scattered dwellings and farm buildings located to its north, west and south.

10.30 The following Local Plan policies are considered to be applicable to this proposal:

10.31 Local Plan Policy EN1 Built, Natural and Historic Environment states:

New development will, where appropriate, promote the protection, conservation and enhancement of the historic and natural environment by:

a. Ensuring the protection and enhancement of existing natural and historic environmental assets and their settings in proportion with the significance of the asset;

b. Contributing to the provision of multi-functional green infrastructure;

c. Addressing climate change, habitat loss and fragmentation through creating new habitats and the better management of existing habitats;

d. Seeking to improve air, soil and water quality where feasible; and

e. Ensuring design standards that complement the character of the area and the sustainable use of the development.

10.32 Local Plan Policy EN4 The Wider Natural and Historic Landscape states:

1. *'Development will be permitted where it does not have a significant detrimental impact on the natural and historic landscape (including the tranquillity of the countryside) of Cotswold District or neighbouring areas.*

2. Proposals will take account of landscape and historic landscape character, visual quality and local distinctiveness. They will be expected to enhance, restore and better manage the natural and historic landscape, and any significant landscape features and elements, including key views, the setting of settlements, settlement patterns and heritage assets.'

10.33 Whilst the site is not located within Kemble and Ewen Special Landscape Area, the following policy has been taken into account when making this recommendation:

10.34 Local Plan Policy EN6 Special Landscape Areas states:

'Development within Special Landscape Areas will be permitted provided it does not have a significant detrimental impact upon the special character and key landscape qualities of the area including its tranquillity'.

10.35 In terms of the Kemble and Ewen Neighbourhood Plan, the following policies are considered applicable to the western part of the application site:

10.36 Policy KE6 - Green Infrastructure

'The network of Green Infrastructure (GI) within the neighbourhood plan area will be protected for its recreation, open space and wildlife value. New GI, particularly where it creates links to the existing GI network and improves access to the countryside for informal recreation and net gains in biodiversity will be supported. Development will only be permitted where it retains/protects/enhances the recreational, biodiversity, water management and other functions of the GI network. New development should enhance linkages to the wider existing GI network and improve access to the countryside for informal recreation, where appropriate.'

10.37 Policy KE11 -Landscape

Proposals for development should:

a) Retain and where possible enhance those landscape assets which are of benefit to the quiet enjoyment of the rural landscape by residents and the community. In identifying such areas regard will be had to the Kemble Landscape Appraisal undertaken by Tyler Grange;

b) Maintain the physical and visual separation between Kemble and Ewen to retain the sense of identity of the distinct settlements;

c) Reinforce the Thames valley landscape in respect of its recreational value and visual amenity creating a quiet and tranquil valued rural landscape;

d) Maintain and enhance field pattern and enclosure where possible;

e) Enhance valued landscape features which are in decline or in poor condition;

f) Avoid further aesthetic erosion of the landscape/farmed edge of the villages; and

g) Protect views and vistas identified in the Kemble Landscape Appraisal and the Kemble and Kemble Station Conservation Areas Appraisal undertaken by Montagu Evans from significant detrimental impact.

10.38 With regard to national policy, Paragraph 187 of the National Planning Policy Framework (NPPF) states that planning policies and decisions should contribute to and enhance the natural and local environment by *'recognising the intrinsic character and beauty of the countryside'.*

10.39 It is noted that the solar farm development is proposed for a 40 year period after which the land will be restored to agriculture. In this respect, the proposed development is reversible and one which would not result in a permanent change to the character and appearance of the landscape. However, a period of 40 years is still considered to represent a significant length of time and, one which would result in the perception of a permanent change for many people who live and work in the area. In this regard, it is considered reasonable to assess this proposal on the grounds that it would result in changes to the landscape which are more akin to a permanent change rather than a short term alteration.

10.40 The application site forms part of a relatively open and gently undulating agricultural landscape that is characteristic of the wider landscape lying between the villages of Ewen to the west, Siddington to the north-east and Somerford Keynes to the south. The area proposed for the solar arrays is largely bordered by hedgerows with an area of woodland lying adjacent to the southern edge of the application site. Notwithstanding this, it is also noted that 2 overhead electricity power lines run in close proximity to the western edge of the application site. The power lines are supported by metal pylons and run parallel with one another.

10.41 This application is accompanied by a Landscape and Visual Impact Assessment (LVIA) which has assessed the site from a number of public vantage points, including the local highway network and Public Right of Way BSN7.

10.42 In terms of public views, the site is bordered to its south and east by roads. A further road runs to the west and north of the site. Public Right of Way BSN7 runs in an east-west direction approximately 370m to the north of the main body of the application site.

10.43 Views from the roads to the east and south of the main body of the site are largely screened by existing roadside hedgerows. Whilst glimpsed views would be available from field entrances and above hedgerows in certain instances, the existing roadside hedgerows are of a size that would provide significant levels of screening in most cases. In addition, the attention of road users tends to be on the highway rather than the adjacent landscape thereby reducing the visual and landscape impact of the proposal when compared to the experience of pedestrians using a Public Right of Way for instance. In addition, the existing woodland located adjacent to the southern part of the site would also provide a further degree of screening of the central part of the site when viewed from the south. New tree planting is also proposed along a section of the southern boundary of the application site. The submitted LVIA indicates a

moderate/minor effect when viewed from the road to south and no effects when viewed from Spratsgate Lane to the east (due to existing hedgerows).

10.44 With regard to views from the lane to the west/north of the site, it is noted that the site is separated from the aforementioned highway by fields. There would therefore be a degree of separation between the solar panels and the respective lane. In addition, existing trees and vegetation provide a significant degree of screening when viewed from the west. Views of the site from the north are more open, with the site forming part of an expansive view which incorporates both the site and the wider landscape. Moreover, the views in question place the site in context with 2 lines of electricity pylons which are notable features within the landscape. The proposed panels would also be located approximately 350m from the lane at its closest point. In light of their distance from the lane, the relatively low height of the solar panels and the presence of the existing electricity pylons, it is considered that the landscape and visual impact of the proposed development when viewed from the lane to the north would be limited. The LVIA indicates a minor effect at the end of the construction period reducing to no effects after a period of 10 years when new landscaping has had an opportunity to develop.

10.45 With regard to Public Right of Way BSN7, it is noted that the existing footpath extends through countryside, as well as a farmyard and along a farm drive. Whilst views southwards towards the proposed solar panels are available, views are also influenced by existing farm development and the entrance drive. Agricultural fields located to the immediate south of the Public Right of Way will be retained as at present, thereby providing a buffer between the footpath and the application site. The LVIA identifies a moderate effect at the end of the construction stage which reduces to minor positive in the ten year period after construction following the introduction of new hedgerow planting along the site's northern boundary. Whilst Officers do not necessarily concur with the latter opinion, it is considered that the landscape and visual effects of the proposal on the experience of the users of the Public Right of Way would not be substantial or significant. The distance of the solar panels from the route of the Public Right of Way, combined with new landscaping, are considered to mitigate the impact of the proposed development when viewed from the Public Right of Way.

10.46 With regard to other elements of the proposal, it is considered that the construction access road would have the appearance of a stone surfaced agricultural track which would not appear out of character with its rural setting. In addition, the proposed underground cable route would have no discernible impact on the character or appearance of the landscape following its

completion. Finally, the new substation is well screened by existing roadside hedgerows and is modest in size. It is considered that its introduction can justified on landscape terms given the wider environmental benefits arising from the delivery of renewable energy.

10.47 The Landscape consultant engaged by this Council to review this application provided the initial response to this application:

'Landscape Character

10.47.1 The application site falls within the Cornbrash Lowlands Landscape Character Type as defined in the Gloucestershire Landscape Character Assessment (2006), and more specifically within the Siddington and South Cerney Cornbrash Lowlands Local Character Area.

10.47.2 This is a gently undulating agricultural landscape characterised by a regular rectilinear field pattern, defined by hedgerows and occasional mature trees. The area is generally sparsely settled and retains a strong rural character, although the openness of some field compartments and the limited vertical structure in places can increase the visibility and prominence of development.

10.47.3 The landscape strategy for this character area is to conserve and reinforce the traditional field structure and rural character, restore fragmented hedgerows, and avoid the introduction of large-scale or industrial features that would contrast with the prevailing pattern, scale, or texture of the landscape.

10.47.4 In this context, infrastructure such as ground-mounted solar arrays has the potential to erode the simplicity and openness of the local landscape unless it is carefully designed and effectively mitigated. The degree to which the proposals follow existing field boundaries, respond to the grain of the landscape, and establish effective visual screening will be essential in limiting effects on local character and ensuring successful long term integration.

10.47.5 While the submitted LVIA broadly follows GLVIA3 and includes an assessment of both landscape and visual receptors, there appears to be a disproportionate emphasis on viewpoint-based analysis in forming judgements about landscape effects. This is particularly evident where the assessment of landscape character is often expressed in terms of what is visible from a given viewpoint, rather than from a broader understanding of the landscape unit as a whole.

10.47.6 For example, changes to land use, the introduction of perimeter fencing and infrastructure, and the inclusion of engineered elements have the potential to affect the landscape's rural character and perceived coherence, even where views are filtered or screened. These effects relate not only to visibility but to the function and integrity of the landscape at the site level and within the wider LCT. As such, impacts on these characteristics and the perception of rural land management may be under-represented when conclusions are drawn through the viewpoint based analysis of landscape impacts.

10.47.7 Similarly, the assessment correctly notes that the Cornbrash Lowlands are of medium landscape value with moderate susceptibility, and that the proposal would introduce new characteristics into the landscape. However, the extent to which the development would influence the receiving landscape character, particularly its simplicity, rectilinear field structure and agricultural function has not been fully explored.

10.47.8 On this basis, a more balanced approach that considers landscape impacts on the Site's character and the relevant landscape character areas (local and national) is needed. This would help to ensure that conclusions on landscape effects are not overly dependent on what is seen from viewpoints but reflect the broader implications of development on local character, fabric and structure.

Visual Amenity

10.47.9 From a visual impact perspective, the LVIA includes 10 viewpoints supported by Type 3 photomontages in line with LI Technical Guidance Note 06/19. The visualisations demonstrate that the proposed arrays would be partially or wholly screened in most middle and long-range views.

10.47.10 Shorter-range receptors along Ewen Road, Spratsgate Lane and local PRoWs would experience the greatest degree of change. From VP1 and VP5 in particular, the arrays would be intermittently visible during winter months and prior to the full establishment of hedgerow planting. However, these effects would reduce over time.

10.47.11 Visual effects are assessed by the applicant as predominantly Minor or Moderate/Minor. This is generally supported, although for some receptors, particularly walkers on footpaths BSN7 and the Thames and Severn Way, a more cautious Moderate effect may be appropriate in the early operational years. Nevertheless, these are not considered significant/substantial.

Cumulative Impact

10.47.12 The submitted LVIA includes consideration of potential cumulative landscape and visual effects, particularly in relation to the existing Siddington Solar Farm located to the east of the application site. While the introduction of a further solar farm will contribute to a degree of adverse change, particularly through the further loss of agricultural land use and the introduction of additional infrastructure into the rural landscape, we are satisfied that this will not give rise to substantial/ significant cumulative effects at a landscape character area scale. This conclusion reflects the physical separation between the two sites, the retained field patterns, intermittent tree cover and a visually enclosed rural character that will remain legible, provided the proposed mitigation planting is successfully implemented and managed over time.

10.47.13 From a visual standpoint, while there may be limited locations, such as along the Thames and Severn Way, where both schemes are perceptible in sequence, such views would remain filtered and intermittent. With the proposed mitigation in place and subject to successful establishment, we consider the risk of substantial cumulative visual effects to be low and adequately addressed.'

10.48 In response to additional information provided the applicant, the Landscape consultant advises:

' Review of Submitted Information

Landscape Character

10.48.1 The applicant has reiterated that the LVIA (March 2025) acknowledges long-term significant adverse effects on the character of the site itself and sets out the elements giving rise to this change. While this clarification is noted, it is also important to acknowledge that landscape character can be affected regardless of visibility. Although the consultant has used viewpoints to illustrate how the influence of the development will be limited where it is not widely seen, changes to land use, landscape fabric and perceptual qualities still represent a degree of character effect even where views are contained. That said, we recognise that these adverse effects are not judged to be significant at the wider Cornbrash Lowlands LCT scale or long-term.

Visual Amenity

10.48.2 The submitted CZTV (bare earth) illustrates theoretical visibility between Furzen Leaze, Siddington and Kemble Wick solar farms. While the

applicant asserts that intervening vegetation, settlement and landform would prevent significant cumulative views, we note that sequential and localised awareness of the schemes may still arise for sensitive receptors such as walkers on PRoWs, particularly the Thames and Severn Way and routes north of Ewen.

10.48.3 On balance, given the physical separation, intervening features and visual enclosure, we agree that the risk of significant cumulative landscape or visual effects across the study area is low.

Landscape Proposals

10.48.4 The applicant confirms hedgerows would be maintained at 2.5-3.5m height, which aligns with our previous recommendations. This, alongside species-rich hedgerow mixes and occasional standard native trees, should be explicitly secured through a conditioned Landscape and Ecological Management Plan (LEMP).

Conclusion

10.48.5 The further information submitted addresses elements of our earlier consultation, particularly around cumulative effects and mitigation detail.

10.48.6 On this basis, the proposals are not considered to result in unacceptable landscape or visual harm subject to the recommended conditions being applied.''

10.49 In visual terms, it is considered that the proposed development would be relatively well screened by existing and proposed vegetation. The visual impact of the scheme is therefore considered to be limited when viewed from public vantage points. In terms of landscape character, it is considered that the proposal would have a discernible impact on the existing agricultural character of the landscape. The introduction of solar panels and associated development would therefore result in a more heavily engineered landscape which would be at odds with the informal, undeveloped character of the existing fields. In this respect, the proposal is considered to cause a degree of harm to the landscape. However, for the reasons set out by the Landscape consultant above, it is considered that the harm is not significant and would not outweigh the benefits arising from the delivery of renewable energy.

10.50 The concerns of objectors regarding the cumulative impact of this scheme in combination with other recently permitted solar farm schemes in the area are noted. However, due to the distances between the respective sites, it is

considered that there is no physical or visual interconnectivity between the individual developments. As such, each site would appear as a standalone development and the combination of the approved and proposed developments is considered not to have an adverse cumulative impact on the prevailing landscape character of the area.

10.51 The proposed development is considered not to have an adverse impact on the setting of Kemble and Ewen Special Landscape Area (SLA) by virtue of the distance of the development from the aforementioned area and the level of intervening vegetation.

10.52 It is considered that the introduction of the solar farm would have an impact on the character and appearance of the area. However, this impact will be mitigated by proposed new landscaping and green infrastructure. The impact of the proposed development is also considered to be relatively localised. It is considered that the landscape and visual impacts of the proposal are outweighed by the benefits arising from the provision of renewable energy and the need to address the issue of climate change.

(c) Impact on the Setting of Heritage Assets

10.53 The proposed solar farm is located to the south of 3 Grade II listed buildings - 'Furzen Leaze Farmhouse', the 'Barn and Stable at Furzen Lea Farmhouse' and a pair of cottages 'Furzen Leaze Cottages'. The Barn and Stables and Furzen Leaze Farmhouse are located approximately 350m and 400m to the north of the main body of the application site respectively. Furzen Leaze Cottages are located approximately 550m to the north of the main body of the application site.

10.54 The site is located approximately 590m to the east of Ewen Conservation Area.

10.55 The 'Settlement South East of Chesterton Farm' Scheduled Ancient Monument (SAM) is located approximately 1.4km to the north of the main body of the application site. The proposed cable route is located approximately 450m to the east of the SAM at its closest point.

10.56 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that when considering whether to grant planning permission for development which affects a listed building or its setting, the Local Planning Authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it

possesses. Considerable importance and weight must be given to the aforementioned legislation.

10.57 In addition to Local Plan Policy EN1 (referred to in the previous section), the following Local Plan policy is also considered applicable to this proposal:

10.58 Policy EN10 Designated Heritage Assets states:

1. *'In considering proposals that affect a designated heritage asset or its setting, great weight will be given to the asset's conservation. The more important the asset, the greater the weight should be.*

2. Development proposals that sustain and enhance the character, appearance and significance of designated heritage assets (and their settings), and that put them to viable uses, consistent with their conservation, will be permitted.

3. Proposals that would lead to harm to the significance of a designated heritage asset or its setting will not be permitted, unless a clear and convincing justification of public benefit can be demonstrated to outweigh that harm. Any such assessment will take account, in the balance of material considerations:

- *The importance of the asset;*
- *The scale of harm; and*
- *The nature and level of the public benefit of the proposal.'*

10.59 Local Plan Policy EN12 Non-Designated Heritage Assets

1. *'Development affecting a non-designated heritage asset will be permitted where it is designed sympathetically having regard to the significance of the asset, its features, character and setting.*

2. Where possible, development will seek to enhance the character of the non-designated heritage asset. Proposals for demolition or total loss of a non-designated heritage asset will be subject to a balanced assessment taking into account the significance of the asset and the scale of harm or loss.

3. The assessment of whether a site, feature or structure is considered to be a non-designated heritage asset, will be guided by the criteria set out in Table 6.'

10.60 The following Neighbourhood Plan policy is of relevance when considering the matter of archaeology:

Policy KE10 - Archaeology

'Any future proposals for development within and around Kemble and Ewen villages should be accompanied by a thorough assessment of the potential effects on archaeological heritage assets in accordance with guidelines issued by the Chartered Institute for Archaeologists and in accordance with a brief approved by the Historic Environment Service of Gloucestershire County Council. This work must be carried out prior to the submission of any planning application. Where possible, and appropriate, development proposals should seek to incorporate archaeology in such a way that any conserved remains can be accessed by the public and that suitable signage and information is provided to and on the site to promote such access and aid interpretation of the asset.'

10.61 In terms of national policy, Paragraph 210 of the National Planning Policy Framework (NPPF) states *'in determining planning applications, local planning authorities should take account of:*

a) The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

b) The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

c) The desirability of new development making a positive contribution to local character and distinctiveness.'

10.62 Paragraph 212 states *'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.'*

10.63 Paragraph 215 states that *'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.'*

10.64 Paragraph 216 of the NPPF states that *'the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required*

having regard to the scale of any harm or loss and the significance of the heritage asset.'

10.65 This application is accompanied by a Heritage Impact Assessment (HIA), which has assessed the potential impact of the proposed development on both designated and non-designated heritage assets as well as features of archaeological interest.

10.66 The listed buildings located to the north of the main body of the application site sit within a relatively flat and open agricultural landscape. Furzen Leaze Farmhouse faces to the south and is bordered to its east, south and north by fields. A farmyard comprising agricultural and equestrian buildings is located to approximately 40m to the south-west of the farmhouse. Within the aforementioned group of buildings is the listed barn and stable. Furzen Leaze Cottages are located approximately 200m to the north-west of the listed barn and stables.

10.67 With regard to Furzen Leaze Farmhouse, the area immediately adjacent to the property will remain unchanged. However, the introduction of the solar array to the south of the farmhouse is considered to have an impact on the wider landscape panorama of the listed building. The network of fields which contribute to the rural setting of the heritage asset would be diminished as a result of this proposal. However, it is also noted that the fields lying to the immediate south of the listed building would be retained, thereby creating a landscape buffer between the proposed solar farm and the heritage asset. New landscape planting would also help to mitigate the landscape and visual impact of the development. Officers consider that the proposal would cause less than substantial harm to the setting of the listed farmhouse, with the harm being at the lower end of less than substantial due to the degree of separation between the application site and the listed building. The HIA states that *'it is considered that the level of harm would be a slight adverse impact'* on the heritage asset.

10.68 With regard to the listed barn and stable, it is noted that the aforementioned building forms part of a group of pre and post war agricultural/equestrian buildings. In addition, the southern elevation of the barn and stable lie immediately adjacent to a post war portal framed building. Other post war buildings are also located to its south and south-west. Existing buildings thereby act as visual buffer between the application site and the listed barn/stable. As a consequence, the historic setting of the heritage asset within the landscape has been diminished as a result of the introduction of more modern developments. There is very little visual intervisibility between the listed building and the site of the solar farm. In addition, the proposed development

would not have an adverse impact on the relationship between the historic barn/stable and the listed farmhouse. The HIA states that *' the impact of the proposed scheme is therefore considered to result in a negligible level of harm to an asset of medium value, resulting in a negligible adverse effect.'* Officers concur with this finding.

10.69 With regard to Furzen Leaze Cottages, the aforementioned pair of cottages are set further away from the solar farm than the other listed buildings referred to previously. In addition, the cottages are bordered by hedgerows with further vegetation and a farm access road lying to their south. In combination with the distance of the heritage asset from the proposed solar farm, it is considered that the proposal would result in a very low level of harm to the setting of the cottages. Officers concur with the findings of the HIA which states *' Due to the limited intervisibility between the asset and the Site, combined with the minor contribution made to significance by the wider setting, the proposed scheme is considered to result in a negligible level of harm to an asset of medium value, resulting in a negligible adverse effect.'*

10.70 With regard to other designated heritage assets, such as Ewen Conservation Area and 'Settlement South East of Chesterton Farm' Scheduled Ancient Monument, it is considered that the proposed development would not have an adverse impact on the setting of the aforementioned assets by virtue of distance and a lack of physical or visual interconnectivity between the application site and the respective conservation area and SAM.

10.71 The conclusion of the HIA states:

10.71.1 'The proposals results are assessed as causing an appreciable change to identifiable character to the setting of three designated assets in the form of Furzen Leaze Farmhouse, Furzen Leaze barn and stable complex and Furzen Leaze Cottage. These assets are Grade II Listed and the potential harm to significance is respectively identified as slight adverse, negligible adverse and negligible adverse. No other designated heritage assets, including any Scheduled Monument or Conservation Area, have the potential to suffer an appreciable adverse effect. Buried archaeological features within and on the northern edge of the Site are also assessed as having a setting but the assets are poorly dated or understood and the harm to their setting cannot be entirely accurately assessed but is currently considered to be negligible adverse. No appreciable adverse effect on settings has been identified on any other non-designated heritage asset.

10.71.2 The proposals would also undoubtedly result in some very minor change to amenity views in regard to the wider Kemble and Ewen Neighbourhood Plan area, but this would not be identifiable as 'harm' to the setting of any heritage asset.

10.71.3 In the opinion of this report the proposals would result in less than substantial harm at the lower end of the scale to the setting of Furzen Leaze Farmhouse, barns and stable complex and the cottage, as well as to the setting of a number of buried archaeological features and the significance of buried archaeological remains. The potential effects may be mitigated through a number of solutions, including the proposed planting and/or design solutions, and/or preservation by record and/or preservation in situ.'

10.72 It is considered that the proposed development would cause less than substantial harm to the setting of the 3 listed buildings located to the north of the proposed solar farm. Due to a combination of distance, proposed landscape planting and limited intervisibility, it is considered that the harm would be at the lower end of less than substantial. As a consequence, it is necessary to weigh the identified harm against the public benefits of the proposal in accordance with the requirements of paragraph 215 of the NPPF. In this instance, it is considered that the creation of the solar farm would deliver significant public benefits through the generation of renewable energy in accordance with the Government's objectives to cut greenhouse gas emissions and to achieve 'net zero'. The proposal would provide renewable electricity for several thousand homes which is considered to represent a level of public benefit that outweighs the harm to the listed buildings. It is therefore considered that there are strong grounds to support this application, notwithstanding the less than substantial harm to the 3 listed buildings.

10.73 With regard to non-designated heritage assets, the HIA identifies the presence of cropmark sites within and along the northern boundary of the application site. The aforementioned sites are considered to be of archaeological interest and have been subject to archaeological investigation. Gloucestershire County Council (GCC) Archaeology has reviewed the submitted application and advises:

10.73.1 'The county Historic Environment Record shows that a number of cropmarks have been recorded from the National Mapping Programme within the proposed development site which appear as several enclosures and linear features which likely represent settlement of unknown date. The nearest Scheduled Monument to the proposed development titled "Settlement SE of Chesterton Farm" (NHLE no. 1003444) is Roman in date and is situated just over

1km from the proposed solar arrays. Archaeological investigations in the nearby vicinity have highlighted the potential for remains from the prehistoric to medieval periods.

10.73.2 The result of geophysical surveys and trial trench evaluation within the site have identified and recorded a number of remains of archaeological interest. The main focus of activity appears on the higher ground in the northern and eastern part of the site and consists of a number of ditched enclosures/field systems, gullies, pits and post-holes as well as two prehistoric ring ditches. Features containing fired clay, pottery, charcoal, ceramic building material and animal bone are indicative of settlement activity dating to the Romano-British and prehistoric periods.

Impact on Significance:

10.73.3 The Heritage Impact Statement/Geophysical Survey/Trial Trench Evaluation have demonstrated that the site has clear potential to contain significant remains from the prehistoric and Romano-British periods.

Recommendations:

10.73.3 For the reasons given above, any forthcoming planning decision must secure a programme of archaeological mitigation work in the form further archaeological investigation work and a mitigation strategy/Management Plan for the preservation in situ/protection and/or preservation by record of archaeological remains impacted by the proposals from construction and during lifetime/decommissioning of the solar farm.'

10.74 Historic England has provided the following response to the application: *'Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application.'*

10.75 The HIA has also identified the routes of the Thames and Severn Canal and the Cheltenham and Great Western Union Railway as non-designated heritage assets. The route of the canal is located approximately 345m northwest of the solar array site and 85m west of the substation site. It has been infilled and its route is defined for the most part by a hedgerow. The former railway line runs to the north of the solar farm and is approximately 170m to the north of the proposed substation lying to the west of Spratsgate Lane. Having regard to the distance of the proposed development from the aforementioned features, it is

considered that the proposal would not have an adverse impact, or cause harm to, the significance of the non-designated heritage assets.

10.76 It is considered that the proposed development is in accordance with Local Plan Policies EN1, EN10 and EN12, Neighbourhood Plan Policy KE10 and Section 16 of the NPPF.

(d) Access and Highway Safety

10.77 The proposed solar farm would be accessed via an existing field entrance located to its north. The existing entrance opens onto a lay-by which lies adjacent to the western side of Spratsgate Lane. The aforementioned lane is a metalled 2 way Class C highway which is subject to the national speed limit. The aforementioned entrance would be used during the construction and operational phases of the development. It opens onto a relatively straight section of road. Adequate visibility can be provided in both directions to enable safe access and egress to the application site. Swept path analysis plans have also been submitted in order to demonstrate that construction vehicles can manoeuvre safely into and out of the site.

10.78 The submitted details also demonstrate that a safe means of access and egress can be secured to and from the proposed substation to the north of the main application site.

10.79 With regard to construction traffic, the submitted Transport Statement states;

'Access to Spratsgate Lane from the strategic road network will be from the A419 to the south-east of the Site, via the B4696 Spine Road East and Spine Road West. Construction vehicles would then egress the Site to then north along Spratsgate Lane, returning to the A419 via Wilkinson Road and Love Lane Industrial Estate. This proposed one-way system of Site access and egress will help to limit the impact of development-related traffic along each section of the local highway network.'

10.80 Construction traffic can therefore access the site without the need to drive through villages near the application site.

10.81 In terms of traffic generation, it is anticipated that the construction phase of the development would last for 6-8 months, with approximately 100-150 staff being present on site during this phase. Construction hours would typically be between 07:30 and 18:00 on weekdays and 08:30 and 13:00 at weekends.

10.82 With regard to HGV movements, the Transport Statement states:

'during the phase of establishing works at the Site (weeks 1- 6) there is expected to be a total of approximately 24 two-way delivery-related movements per day on weekdays and 10 on Saturdays, on average. During the main construction phase (weeks 7 - 26), there is expected to be 6 two-way delivery-related movements per day on weekdays and 3 on Saturdays on average over the 20-week period.'

10.83 In relation to traffic movements in general, the Transport Statement states:

' In total, there will be a maximum of approximately 86 two-way movements per day on average throughout the main construction period and a peak traffic generation of 144 two-way movements per day during the initial 6-week period of peak activity in the phase of establishing works.'

10.84 Traffic count data from 2019, which relates to a stretch of Spratsgate Lane located to the north of the application site, recorded a two-way average annual daily flow of approximately 5,300 vehicles, including 166 daily two-way HGV movements. In the context of the level of traffic already using the local highway network and the relatively short term nature of the construction period, it is considered that the proposal would not conflict with paragraph 116 of the NPPF, which states *'development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.'* It is also considered that proposal accords with Local Plan Policy INF4: Highway Safety.

10.85 On completion, the solar farm will require very limited vehicular access, other than for maintenance and general management.

10.86 Gloucestershire County Council (GCC) Highways has assessed the application and raises no objection to the proposal.

10.87 It is considered that the proposed development can be undertaken without having an adverse impact on highway safety or the operation of the local highway network in accordance with Local Plan Policy INF4 and Section 9 of the NPPF.

(e) Impact on Residential Amenity & Glint and Glare

10.88 The application site borders agricultural fields, woodland and 2 highways. Notwithstanding this, a number of dwellings are also located near the application site. The closest of these is South Leaze Farm which is located on the southern side of Ewen Road approximately 30-40m from the southern boundary of the application site. 2 further dwellings (Shooter's Hill Bungalow & Shooter's Hill Cottage) are located approximately 170m & 220m respectively to the west of the application site. Other dwellings such as Ashwater House and Lodge are located approximately 280m to the north-west of the site. Furzen Leaze Farmhouse, Furzen Leaze Cottages, 3 & 4Furzen Leaze Cottages and Sandy Lane Farm are located to the north of the site.

10.89 In terms of noise and disturbance, the operational phase of the solar farm is considered not to have an adverse impact on local residents. Noise would be limited to transformers, inverters and associated plant which is considered not to have an unacceptable impact on local residents given the separation distance between the aforementioned equipment and existing properties. In addition, it is noted that plant and machinery at the Siddington solar farm is located approximately 50-60m from dwellings, which is closer than that proposed as part of this application. For instance, plant/buildings would be located approximately 120m to the north of South Leaze Farm to the south. An area of woodland would also be positioned between the aforementioned features and the respective dwelling.

10.90 It is noted that the construction phase of the development is likely to cause disturbance to local residents. However, in light of the relatively short term nature of the construction phase and the proposed operating hours it is considered that the potential impact would be limited and not at a level that would conflict with the requirements of Local Plan Policy EN15: Pollution and Contaminate Land.

10.91 The applicant has submitted a Noise Impact Assessment which stats that noise levels generated by the proposed development would be lower than existing background noise levels.

10.92 The Council's Environmental and Regulatory Services Noise Officer states:

10.92.1 The report suggests that the modelled sound level at Southleaze Farm would be +1dB above background during the early morning. I do have reservations in relation to the Noise Impact Assessment not accounting for tonality. The report suggests that due to the propagation distance a tone would

be difficult to perceive, however, BS4142 does not define a specific distance for a tone to be audible. It applies a penalty for the characteristics of a sound, and given the nature of the plant it would seem appropriate for a penalty to be included even as a worst-case scenario. Therefore, I have a concern the report may under represent the level of impact.

10.92.2 That said, the duration of exposure is suggested to be low in terms of impact in the early morning (04:45 to 07:00) from the inverters. However, any noise impact would be during the spring/summer months when people are more likely to have windows open. I would consider, as the report suggests it is unlikely to constitute an adverse impact in terms of BS4142. However, given the borderline modelled predictions and also no accounting for tonality I would recommend (in addition to my previous conditions) that a post verification report is submitted in line with the following condition;

10.92.3 Within 6 months of first use of the development, a noise validation report shall be submitted to and approved in writing by the Local Planning Authority. This noise validation report shall be completed by a suitably qualified Acoustician, accredited by the Institute of Acoustics (IOA) and/or the Association of Noise Consultants (ANC). This report must demonstrate compliance with the relevant noise criteria, outlined within the approved Noise Impact Assessment [J005206-8674-SH-03] and where necessary suggest any mitigation measure that may be required.

Reason: To protect the amenity of the locality, especially for people living and/or working nearby, in accordance with the NPPF and local planning policy EN15.'

10.93 The suggested condition has been updated to ensure that the condition is suitably precise and enforceable.

10.93.1 Within 6 months of first use of the development hereby permitted, a Noise Validation Report shall be submitted to and approved in writing by the Local Planning Authority. The Noise Validation Report shall be completed by a suitably qualified Acoustician, accredited by the Institute of Acoustics (IOA) and/or the Association of Noise Consultants (ANC). The report shall demonstrate that the development is in compliance with the relevant noise criteria, outlined within the approved Noise Impact Assessment [J005206-8674-SH-03] and, if this is not being achieved, shall set out measures to ensure compliance with the aforementioned assessment and a timetable for the implementation of such measures. The development shall be retained/maintained in accordance with the approved details thereafter.

Reason*: To protect the amenity of the locality, especially for people living and/or working nearby, in accordance with Local Plan Policy EN15 and paragraph 198 of the National Planning Policy Framework.*

10.94 The proximity of the proposed development to South Leaze Farm to the south is noted. At present, the aforementioned property is separated from the application site by a road. Roadside vegetation and a woodland are located to the north of the dwelling. As a consequence, there would be a degree of screening between the aforementioned property and the rows of solar panels. Existing vegetation combined with new roadside planting would provide a degree of screening between the proposed development and South Leaze Farm. It is recommended that the proposed landscaping condition also requires additional landscape planting along the southern boundary of the application site to the east of the existing woodland. It is also noted that Ashwater House and Lodge to the north-west of the application site are also bordered by vegetation which would provide a degree of screening of the site when viewed from the aforementioned properties.

10.95 It is considered that the proposed development can be undertaken in accordance with the requirements of Local Plan Policy EN15 and guidance contained in paragraph 198 of the NPPF.

10.96 The issue of glint and glare has been considered as part of the application submission. The applicant has commissioned a Solar Photovoltaic Glint and Glare Study which has assessed the potential impact of the development on local residents, as well as road users and aviation. In the case of residential properties, the study indicates that the development would have no impact on most properties within the vicinity. A low impact is identified in relation to the dwellings located to the north of the application site and a moderate impact on Shooter's Hill Bungalow & Shooter's Hill Cottage to the west. The study states:

10.96.1 'For two dwellings, solar reflections are predicted for more than three months per year but less than 60 minutes on a given day. Partial screening in the form of existing vegetation and/or buildings has been identified for the dwellings. Additional mitigating factors have been identified in the form of reflections coinciding with direct sunlight and the significant separation distance between the dwellings and reflecting panels, which reduce the level of impact. A low impact is predicted upon these dwellings, and mitigation is not recommended.

10.96.2 For two further dwellings, solar reflections are predicted for less than three months per year and less than 60 minutes on a given day. Partial screening in the form of existing vegetation has been identified. A low impact is predicted, and mitigation is not recommended.

10.96.3 For the remaining two dwellings, the solar reflections are predicted to occur for more than three months of the year but less than 60 minutes on any given day. Partial screening in the form of existing vegetation and/or terrain has been identified for the dwellings. No significant mitigating factors which could reduce the level of impact have been identified. A moderate impact is predicted, and mitigation is recommended.'

10.97 Additional landscape planting can be added to the western boundary of the application site as part of landscaping scheme in order to mitigate the impact of the proposal on the properties in question.

10.98 In terms of the impact of glint and glare on the local road network, the study has identified that the majority of the road network will not be subject to change. A low impact is predicted for approximately 100m of Spratsgate Lane, however, this will be outside the road user's primary field-of-view. A further 300m section of Spratsgate Lane would potentially be subject to a moderate impact as the solar reflections occur within the primary field of view. It is proposed to condition additional landscape planting to address this matter.

10.99 With regard to aviation, the study identifies a low impact in relation to South Cerney Airfield, Cotswold Airport and Oaksey Park Airport. No mitigation is proposed. The Civil Aviation Authority, Ministry of Defence and Cotswold Airport haven been consulted as part of the application process. The Ministry of Defence has raised no objection. No response has been received from any of the other aforementioned bodies.

10.100 Subject to the additional landscape planting mentioned above, it is considered that the proposed development would not have an unacceptable impact in relation to glint and glare. The panels are designed so that light is reflected in a diffuse manner. Reflected light is therefore broken up in contrast with light that would reflect from a window or car windscreen.

10.101 It is considered that the proposed development can be undertaken in accordance with the requirements of Local Plan Policy EN15 and guidance contained in paragraph 198 of the NPPF.

(f) Biodiversity

10.102 The application site consists primarily of arable fields bordered by hedgerows. An area of woodland lies adjacent to the southern part of the main part of the site. A drainage ditch also extends in a north-south direction through the site. Ponds are also present within the site. The application site is located approximately 400m from the Cotswold Water Park Site of Special Scientific Interest (SSSI). It falls with the impact risk zone of the aforementioned SSSI.

10.103 This application is accompanied by an Ecological Impact Assessment (EcIA).

10.104 The Council's Biodiversity Officer provided the following initial comments in response to this application:

'Designated sites

10.104.1 The site is within a SSSI impact risk zone which requires the consultation of Natural England, and the Cotswold Water Park SSSI is approximately 400m from the site. Measures to safeguard the SSSI and Siddington Canal Local Wildlife site are recommended to be included within a CEMP. As no birds for which the SSSI is designated have been recorded using the site, I consider that the proposed mitigations to safeguard the SSSI are likely to be sufficient in this instance and can be secured by condition if other biodiversity issues are resolved.

Habitats

10.104.2 The site is predominantly arable, with hedgerows and trees present on field boundaries and site peripheries and an on-site pond. Hedgerows, mature trees and the pond are largely to be retained, and protection measures to safeguard these habitats are proposed in the EcIA. A buffer zone of 5m around retained hedgerows is proposed, but further information for the buffer around the retained on-site pond is required as this has not been stated.

Protected species

10.104.3 Great Crested Newts - Areas of the site fall within the amber and red impact risk zones as per the Great Crested Newt District Licensing Scheme, and there are 55 ponds within 500m of the site. One of the identified ponds (P3) is located on-site, with P1 and P2 off-site.

10.104.4 The eDNA surveys from P2 (approximately 175m from the site boundary) returned a positive result for GCN. P1 was recorded as seasonally dry, and P3 and P4 returned negative eDNA results for GCN. No assessment for population size has been undertaken on P2. Not all ponds within 500m of the site have been assessed for their potential to support GCN, and some of these ponds appear to be connected to the site. With reference to the NatureSpace consultee comments provided 3rd July 2025, I agree that the site itself provides suitable terrestrial habitats for GCN including the arable land. Therefore, based on the information submitted, I do not feel that the proposed mitigation in the form of a PWMS is likely to be sufficient, and in order for the works to be undertaken lawfully, they will need to proceed under licence. This can be through entering into the District Licensing Scheme or via the traditional licensing route with Natural England.

10.104.5 The details of an appropriate mitigation route through the entering of a suitable licensing scheme are required to enable the Council to discharge its statutory obligations in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended).

10.104.6 Badgers - A single sett entrance was recorded on the western site boundary which was assessed to be active. Section 3.29 states that a 30m exclusion buffer has been incorporated into the site layout, which appears to be consistent with drawing GBR0110.DEV.M2.001.0.E.j. This is likely to be sufficient. Sections 3.30 to 3.34 are considered to be sufficient to safeguard badgers, and measures are to be detailed within a CEMP, to be secured by condition if all other biodiversity issues are resolved.

10.104.7 Bats - The EcIA assessed that a complete season of bat activity surveys was not required due to the proposals not impacting any of the identified trees, and the retention of the majority of on-site suitable habitats. The on-site hedgerows are likely to be a key feature for local bat populations, and at present, it cannot be fully understood how bats may be using the site or be impacted by the proposals. Therefore, further surveys should be undertaken to understand how bats are using the site and to inform any further mitigation requirements.

10.104.8 Birds - The bird surveys recorded the presence of at least 15 priority bird species in addition to nonpriority and green-list species. It is proposed to deliver at least five skylark plots in farmland adjacent to the site within the ownership boundary. The EcIA recommends that a farmland bird mitigation strategy and management of the plot for at least 10 years is secured by condition. This off-site plot of land within the ownership boundary has not been

assessed for its viability to provide suitable mitigation and compensatory habitat for skylark.

10.104.9 It is noted from the breeding bird survey information that a number of skylarks were recorded outside of the red line boundary and within the blue line boundary, though no skylarks were recorded within the proposed mitigation site itself. Streetview imagery of the proposed mitigation site also appears to indicate that the site has powerlines running over and around some of the site boundaries which would potentially act as predator perches. Therefore, it is not clear that the proposed mitigation plot for skylarks will be suitable and further assessment of this plot is required. Circular 06/2005 Biodiversity and Geological Conservation - Statutory Obligations and Their Impact Within The Planning System sets out that it is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted. Skylarks are also listed as a species of principle importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006, and the LPA has a duty to conserve and enhance priority species in accordance with the NERC Act 2006, Chapter 15 of the National Planning Policy Framework, local plan policy EN8 and to comply with the biodiversity duty. In addition to this, other red listed and priority bird species such as linnet and yellowhammer were recorded on site during the bird surveys. It is likely that retained hedgerows and buffer zones of 5m will be sufficient to ensure that the site remains suitable for these species.

10.104.10 I agree with the assessments and recommendations pertaining to wintering birds.

10.104.11 Dormice - I agree with the assessments and recommendations pertaining to Dormice. The EcIA proposes that precautionary measures will be included within a CEMP, which is sufficient in this instance, and can be secured by condition if all other biodiversity issues are resolved.

10.104.12 Reptiles - The majority of habitats suitable for reptiles are to be retained, and the EcIA recommends that a PWMS for reptiles. It is my view that this approach is sufficient in this instance, and a PWMS should be secured by condition if all other biodiversity issues are resolved.

10.104.13 Other species - Assessments and recommendations for hedgehogs and brown hare in the EcIA are considered to be sufficient. It is stated in sections 3.62 and 3.66 that fencing will have openings at its base level to maintain connectivity for these species. I am supportive of the retention of connectivity

across the site, though it should be noted that no indicative proposals of where holes in fencing will be are included with the application.'

10.105 In response to the above comments and ongoing discussions with the Biodiversity Officer, the applicant has set aside a field to the west of the application site for skylark mitigation. In addition, battery storage containers have been removed from this proposal in order to reduce the potential impact of noise on bat species using nearby hedgerows and woodland. At the time of writing this report, the applicant had also commissioned additional Great Crested Newt surveys. It is expected to be able to provide Committee Members with an update at the meeting to be held on the 13th May.

10.106 It is noted that Great Crested Newts are a European Protected Species. It is therefore necessary to have regard to ODPM Circular 06/2005 (para 116) and the Conservation of Habitats and Species Regulations 2017 (as amended), and consider the proposal against the 3 'derogation' tests, as set out in Regulation 55 of the aforementioned Regulations :

'a) The preserving of public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment:

b) There must be no satisfactory alternative:

c) The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.'

10.107 If the applicant were to enter the District Licensing process (which is operated by NatureSpace and authorised by Natural England), then the derogation tests would be addressed as part of the aforementioned licence process. If the applicant were to pursue the more traditional licence route with Natural England, then this Council will need to demonstrate that the proposal reasonably addresses the above mentioned tests. At the present time, it is considered that the delivery of renewable energy would be represent an overriding public interest. In addition, due to the size of land necessary to facilitate the creation of the solar farm, including the ability to provide a connection to the National Grid, it is considered that there is no satisfactory alternative to the current scheme. Criterion c is currently being addressed as part of the ongoing surveys and discussions between the applicant and the Biodiversity Officer.

10.108 Natural England has raised no objection subject to condition.

10.109 With regard to Biodiversity Net Gain (BNG), the applicant is seeking to provide such enhancements on-site. The submitted biodiversity metric calculations set out the following enhancements - *'55.29% net gain in area habitat units, 10.10% net gain in hedgerow units and 29.17% net gain in watercourse units'*. In response, the Biodiversity Officer has requested further clarification about a number of the calculations within the metric. At the time of writing this report, discussions are still ongoing between the applicant and Biodiversity Officer. However, it is also anticipated that this matter will be resolved before the May Committee meeting and that the applicant will be able to demonstrate the necessary 10% enhancement. If this is the case, a S106 legal agreement will be required to secure a BNG monitoring fee.

(g) Drainage and Flooding

10.110 The majority of the application site is located within Flood Zone 1, which is the lowest designation of flood zone and one in which new development of the type proposed can be acceptable in principle. A section of the central part of the main body of the site falls within Flood Zones 2 and 3. The aforementioned area is linear in form and extends in a roughly north-south direction alongside an existing drainage ditch. In addition, a section of the proposed cable route lying approximately 600m to the north of the application site crosses an area of land classified as falling within Flood Zones 2 and 3.

10.111 This application is accompanied by a Flood Risk Assessment and Drainage Strategy. The aforementioned document states that the majority of the site will continue to have a permeable surface thereby allowing rainwater to infiltrate into the ground as at present. The strategy has taken account of additional rainfall arising from climate change. Rainwater from the panels will typically collect under the panels. The presence of tussock grass can prevent soil erosion and the flow of surface water to other parts of the site and beyond. In addition, it is proposed to create a *'perimeter wide cross-contoured vegetated swale'* along the downstream boundary of the site which would intercept any additional southward flow. Permeable surfaces are proposed for the access track and around new buildings. The footprint of new buildings would be represent a very minor part of the site as a whole and is considered not to result in a material change to existing surface water flows across the site. Measures are also proposed to avoid soil compaction during the construction phase of the development.

10.112 The cable route, by virtue of its limited width, is considered not have an unacceptable impact on drainage or flooding.

10.113 Gloucestershire County Council Lead Local Flood Authority raises no objection to the application. It states:

' Flood Risk

10.113.1 The Flood Risk Assessment and Drainage Strategy shows that, while parts of the site are in flood zone 2 and 3, due to the nature and location of the development risk is considered low. The Risk of Flooding from Surface Water maps show the risk is low.

Surface Water Management

10.113.2 As long as the vegetation beneath the solar panels is kept intact, research has shown the solar panels should not have a significant impact on the surface water runoff from the site. The access tracks will be constructed of permeable material and the transformer stations, batter storage units and other control rooms add up to a relatively minor increase in impermeable area, are relatively spread across the site and will allow some infiltration beneath some of the structures. These are unlikely to have a significant impact on the runoff from the site either. The document also outlines how the impact the construction of the site will have on runoff will be minimised.

10.113.3 There are ordinary watercourses within the boundary of the site and any alterations to allow access tracks to pass over them or to install the cables beneath them will may require consent under S.23 of the Land Drainage Act, 1991. This is a separate process to the planning process and is carried out by Cotswold District Council.'

10.114 The Environment Agency (EA) has requested additional information in relation to the FRA. The EA has requested further details relating to the impact of climate change and justification for the data included in the FRA. The applicant has provided an updated FRA in response to the comments of the EA. At the time of writing this report, a further response is awaited from the EA. However, it is considered that this matter can reasonably be resolved. Officers will provide a further update at the Committee meeting.

10.115 It is considered, subject to no objection from the EA, that the proposed development can be undertaken without having an adverse impact on flooding

or drainage in accordance with Local Plan Policies EN14 and guidance in Section 14 of the NPPF.

Other Matters

10.116 The proposed scheme would result in the development of agricultural land. Whilst the introduction of the solar panels would not preclude the use of the land for grazing purposes, it would no longer be suitable for arable farming. The applicant has submitted an Agricultural Land Classification (ALC) report with this application. It states:

'A detailed ALC survey has determined that agricultural land within the 47.9ha Study Area, is limited predominantly to Grade 4 (i.e., 23.4ha or 48.8% of the Study Area), with smaller proportions of Grade 2 (i.e., 8.7ha or 18.2% of the Study Area), Subgrade 3a (i.e., 1.2ha or 2.5% of the Study Area), and Subgrade 3b (i.e., 14.6ha or 30.5% of the Study Area).'

10.117 It is evident that the majority of the application site falls outside the best and most versatile land category. Such land falls into the Grade 1, 2 and 3a categories. Paragraph 187 of the NPPF states that planning should recognise *' the intrinsic character and beauty of the countryside and the wider benefits of the natural capital and ecosystem services - including the economic and other benefits of the best and most versatile agricultural land...'* Criterion 1b of draft NPPF Policy N2 states that development proposals should *'use areas of poorer quality agricultural land in preference to that of higher quality, where significant development of agricultural land is demonstrated to be necessary (taking into consideration land which is classified as best and most versatile agricultural land, and its grade).'*

10.118 In this instance, it is considered that the economic and other benefits of the best and most versatile land are limited in this instance and do not outweigh the benefits arising from the delivery of renewable energy. In addition, the land can be returned to agriculture following the cessation of the use of the solar farm.

10.119 The proposed development would be located sufficient distance from hedgerows and trees so as to prevent an unacceptable impact on such landscape and arboricultural features having regard to Local Plan Policy EN7. The Tree Officer raises no objection to this application.

10.120 The applicant has requested a 5 year period in which to implement the development instead of the usual 3 years. In light of the size of the proposed

scheme and the complexities involved in the development of both the solar farm and the cabling route, it is considered reasonable to extend the time period for commencement from 3 to 5 years.

10.121 This application is not liable for the Community Infrastructure (CIL) and there will be no CIL charge payable.

11. Conclusion

11.1 It is considered that the proposed development would make a significant contribution to the delivery of renewable energy and would accord with national and local planning policy and guidance which seeks to reduce greenhouse gas emissions and help to contribute to net zero. It is noted that the proposed development would have an impact on the character and appearance of the landscape and the setting of 3 listed buildings. However, it is considered that these impacts would be mitigated by a combination of distance, in terms of the heritage assets, and the introduction of new landscape planting. It is also considered that other issues, such as those relating to biodiversity, can also be reasonably mitigated by condition and S106 agreement. The proposal is considered not to be unacceptable in any other respects. Subject to the outstanding comments from Biodiversity and the Environment Agency being satisfactorily addressed, it is considered that the benefits of the proposal in terms of the provision of renewable energy outweigh its other impacts. It is therefore recommended that the application is granted permission subject to the recommendation above.

12. Proposed Conditions:

1. The development shall be started by 5 years from the date of this decision notice.

Reason: To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2. The development hereby approved shall be carried out in accordance with the following drawing number(s):

AP.3, AP.4, AP.5, AP.6, AP.7, AP.8, AP.9. AP.12, AP.14, AP.16

AP.10 BLOCK PLAN ISSUE 03 (JG), AP.11 SITE LOCATION PLAN ISSUE 03 (JG)

GBR 0110.DEV.M2.001.0.E.I Module Array Layout

Reason: For purposes of clarity and for the avoidance of doubt, in accordance with the National Planning Policy Framework.

3. Within 12 months of the cessation of their use for electricity generating purposes the solar panels together with any supporting apparatus, mountings, foundations, inverters, platforms, collecting stations, transfer station, fencing and other associated equipment shall be permanently removed from the land fully in accordance with a decommissioning statement that has first been approved in writing by the Local Planning Authority.

Reason: To ensure that the landscape is restored to a condition appropriate for its location in the open countryside in accordance with Local Plan Policy EN4.

4. Prior to the decommissioning of the site, an Ecological Assessment and Mitigation report detailing measures to protect protected species and their habitats during the decommissioning of the site shall be approved in writing by the Local Planning Authority. The site shall be decommissioned fully in accordance with the approved report.

Reason: To safeguard protected and priority species, priority habitats during the decommissioning of the solar farm in accordance with Local Plan Policy EN8, paragraphs 187, 192 and 193 of the National Planning Policy Framework and the Council's duty under Section 40 of the Natural Environment and Rural Communities Act 2006.

5. No development shall commence on site (including any site clearance/preparation works), until a Construction Environment Management Plan (CEMP) has been submitted to the Local Planning Authority for approval in writing. Details shall provide the following, which shall be adhered to throughout the construction period. The CEMP must be completed by a suitably competent person.

i) The parking of vehicles of site operatives and visitors

ii) Loading and unloading of plant and materials

iii) Wheel-wash washing facilities and road-cleaning arrangements

iv) Measures to control the emission of dust and dirt during construction

v) A scheme for recycling/disposing of waste resulting from site preparation and construction works

vi) Measures for the protection of the natural environment

vii) Hours of work on site, including deliveries and removal of materials

viii) Full details of any piling techniques to be employed if relevant and any relevant noise mitigation measures required

ix) Location of temporary buildings and associated generators, compounds, structures and enclosures, and

Reason: To protect the amenity of the locality, especially for people living and/or working nearby, in accordance with Local Plan Policy EN15. It is important that these details are agreed prior to the commencement of development as any on-site works could have implications for local residents in terms of noise and general disturbance.

6. Within 6 months of first use of the development hereby permitted, a Noise Validation Report shall be submitted to and approved in writing by the Local Planning Authority. The Noise Validation Report shall be completed by a suitably qualified Acoustician, accredited by the Institute of Acoustics (IOA) and/or the Association of Noise Consultants (ANC). The report shall demonstrate that the development is in compliance with the relevant noise criteria, outlined within the approved Noise Impact Assessment [J005206-8674-SH-03] and, if this is not being achieved, shall set out measures to ensure compliance with the aforementioned assessment and a timetable for the implementation of such measures. The development shall be retained/maintained in accordance with the approved details thereafter.

Reason: To protect the amenity of the locality, especially for people living and/or working nearby, in accordance with Local Plan Policy EN15 and paragraph 198 of the National Planning Policy Framework.

7. No development shall commence on site until a detailed Sustainable Drainage System (SuDS) Strategy document has been submitted to and approved in writing by the Local Planning Authority, which shall be in accordance with the proposals set out in the approved submission (Surface Water Management Plan; 1010_Furzen_Leaze_SWMP_v2i_20260319; March 2026). The SuDS Strategy must include a detailed design, infiltration tests carried out to the standard of BRE 365, maintenance schedule and confirmation of the management arrangements. The SuDS Strategy must also demonstrate the technical feasibility/viability of the drainage system through the use of SuDS to manage the flood risk to the site and elsewhere

and the measures taken to manage the water quality for the lifetime of the development. The approved scheme for the surface water drainage shall be implemented fully in accordance with the approved details before the development is first put in to use.

Reason: To ensure the development is provided with a satisfactory means of drainage and thereby preventing the risk of flooding in accordance with Local Plan Policy EN14. It is important that these details are agreed prior to the commencement of development as any works on site could have implications for drainage, flood risk and water quality in the locality.

8. Prior to the first use of the development hereby approved, a comprehensive landscape scheme shall be submitted to and approved in writing by the Local Planning Authority. The scheme must show details of all planting areas, tree and plant species, numbers and planting sizes. The proposed means of enclosure and screening should also be included, together with details of any mounding, walls and fences and hard surface materials to be used throughout the proposed development. The landscape scheme must also include additional landscape screening in the areas highlighted in red in Figure 28 and Figure 29 of the Solar Photovoltaic Glint and Glare Study April 2025, as well as new tree and hedgerow planting along the length of the southern boundary of the application site adjacent to the Ewen road.

Reason: To ensure the development is completed in a manner that is sympathetic to the site and its surroundings in accordance with Cotswold District Local Plan Policy EN4.

9. The entire landscaping scheme shall be completed by the end of the first full planting season (1st October to the 31st March the following year) immediately following the completion of the development or the site being brought into use, whichever is the sooner.

Reason: To ensure that the landscaping is carried out and to enable the planting to begin to become established at the earliest stage practical and thereby achieving the objective of Cotswold District Local Plan Policy EN4.

10. Any trees or plants shown on the approved landscaping scheme to be planted or retained which die, are removed, are damaged or become diseased, or grassed areas which become eroded or damaged, within 5 years of the completion of the approved landscaping scheme, shall be replaced by the end of the next planting season. Replacement trees and plants shall be of the same size and species as those lost, unless the Local Planning Authority approves alternatives in writing.

Reason: To ensure that the planting becomes established and thereby achieves the objective of Cotswold District Local Plan Policy EN4.

11. No development or preparatory groundworks shall take place until a strategy for further evaluation (where required), and if necessary, an Archaeological Management Plan and Mitigation Methodology based on the full evaluation results, have been submitted to and approved in writing by the Local Planning Authority. This shall include making provision for the preservation, future management and/or investigation of the archaeological remains informed by the evaluation results and associated solar scheme details.

The Archaeological Management Plan and Mitigation Methodology shall include a timetable and the following components (the completion of each to the satisfaction of the Local Planning Authority will result in a separate confirmation of compliance for each component): -.

(i) Fieldwork investigation and/ or preservation in situ of archaeological remains;

(ii) a post-excavation assessment report and an updated project design for the analytical work - to be submitted for approval within six months of the completion of fieldwork.

(iii) a programme of analysis, production of an archive report and submission of a publication synopsis and preparation of a publication report to be completed within two years of the approval of the updated project design.

(iv) deposition of the physical archive with a museum or store approved by the planning authority, unless otherwise agreed, and deposition of the digital archive with the Archaeology Data Service (or other CoreTrustSeal repository) to be completed within two years of the approval of the updated project design; and

(v) Management plan measures that ensure preserved archaeological remains are protected during the construction, operation and decommissioning stages of the solar farm. Confirmation that this has been achieved should be provided within 3 months of the completion of decommissioning works.

The archaeological strategy outlined in the Archaeological Management Plan and Mitigation Methodology shall be carried out in accordance with the approved details and timings.

Reason: To safeguard heritage assets of primarily archaeological interest within the approved development boundary from impacts relating to any groundworks

associated with the development scheme and to ensure the proper and timely preservation and/or investigation, recording, reporting, archiving and presentation of heritage assets of archaeological interest affected by this development, in accordance with national policies 202 and 218 contained in the National Planning Policy Framework. It is important that these details are agreed prior to the commencement of development as any on-site works could have implications for features of archaeological interest.

12. No development including demolition, site clearance, materials delivery or erection of site buildings, shall start on the site until measures to protect trees/hedgerows on and adjacent to the site have been installed in accordance with details that have first been submitted to and approved in writing by the Local Planning Authority.

These measures shall include:

i) Temporary fencing for the protection of all retained trees/hedgerows on and adjacent to the site whose Root Protection Areas (RPA) fall within the site to be erected in accordance with BS 5837(2012) or subsequent revisions (Trees in Relation to Design, Demolition and Construction). Any alternative fencing type or position not strictly in accordance with BS 5837 (2012) shall be agreed in writing by the Local Planning Authority prior to the start of development. The RPA is defined in BS5837(2012).

ii) Construction Exclusion Zone (CEZ): The area around trees and hedgerows enclosed on site by protective fencing shall be deemed the CEZ. Excavations of any kind, alterations in soil levels, storage of any materials, soil, equipment, fuel, machinery or plant, site compounds, cabins or other temporary buildings, vehicle parking and delivery areas, fires and any other activities liable to be harmful to trees and hedgerows are prohibited within the CEZ, unless agreed in writing with the Local Planning Authority.

The approved tree protection measures shall remain in place until the completion of development or unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure adequate protection measures for existing trees/hedgerows to be retained, in the interests of visual amenity and the character and appearance of the area in accordance with Local Plan Policy EN7. It is important that these details are agreed prior to the commencement of development as any on-site works could have implications for the well-being of trees and hedgerows.

Informatives:

1. IMPORTANT: BIODIVERSITY NET GAIN CONDITION - DEVELOPMENT CANNOT COMMENCE UNTIL A BIODIVERSITY GAIN PLAN HAS BEEN SUBMITTED (AS A CONDITION COMPLIANCE APPLICATION) TO AND APPROVED BY COTSWOLD DISTRICT COUNCIL.

The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for the development of land in England is deemed to have been granted subject to the condition "(the biodiversity gain condition") that development may not begin unless:

(a) a Biodiversity Gain Plan has been submitted to the planning authority, and

(b) the planning authority has approved the plan in writing.

The planning authority, for the purposes of determining whether to approve a Biodiversity Gain Plan if one is required in respect of this permission would be Cotswold District Council. There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. Based on the information available this permission is one which will require the approval of a biodiversity gain plan before development is begun because none of the statutory exemptions or transitional arrangements are considered to apply. If the onsite habitats include irreplaceable habitats (within the meaning of the Biodiversity Gain Requirements (Irreplaceable Habitats) Regulations 2024) there are additional requirements for the content and approval of Biodiversity Gain Plans. Advice about how to prepare a Biodiversity Gain Plan and a template can be found at https://www.gov.uk/guidance/submit-a-biodiversity-gain-plan

Information on how to discharge the biodiversity gain condition can be found here:

https://www.cotswold.gov.uk/planning-and-building/wildlife-and-biodiversity/biodiversity-net-gain-bng/

2. i) The Lead Local Flood Authority (LLFA) will give consideration to how the proposed sustainable drainage system can incorporate measures to help protect water quality, however pollution control is the responsibility of the Environment Agency.

ii) Future management of Sustainable Drainage Systems is a matter that will be dealt with by the Local Planning Authority and has not, therefore, been considered by the LLFA.

iii) Any revised documentation will only be considered by the LLFA when resubmitted through suds@gloucestershire.gov.uk e-mail address. Please quote the planning application number in the subject field.