

### **3 DEVELOPMENT NEED AND CONSIDERATION OF ALTERNATIVES**

#### **3.1 Introduction**

3.1.1 This section of the Environmental Statement examines the potential alternative locations for the proposed development and provides a comparative analysis/assessment of the merits of these locations together with the application site.

3.1.2 The proposed development will generate an income from the residents and users of the leisure facilities, which will feed into the local economy through the creation of employment opportunities within the leisure centre building and also serving/maintaining the external areas of the site. It is proposed that wherever possible employees will be secured locally from the population. It is envisaged that up to an estimated 12 employees some of whom will be part time may be required. However, until the development is completed and fully operational it is not possible to identify either the total number of employees or a breakdown of jobs in detail. The jobs will be made available through local employment agencies but it is envisaged that available candidates within the local job market may not be sufficient to fill all positions and will therefore require employees from further afield and possibly outside the District if necessary.

#### **3.2 Site Selection**

3.2.1 In giving consideration to the suitability of the application site for the proposed development, the applicant has carried out an extensive examination of the Water Park area. It is evident that the majority of leisure and tourism developments are situated in the western portion of the Water Park, with limited development growth to the east. The eastern portion of the Water Park also accommodates a number of potentially suitable locations in terms of their relationships to transport infrastructure, services, and facilities.

3.2.2 The application site does however benefit from mature lakes and bank areas that have regenerated following earlier mineral extraction. In this respect, it is considered that the application site represents the most suitable location for the type of development proposed.

#### Tourism Context

3.2.3 In reviewing the existing tourism facilities within the Water Park, the applicant has identified a concentration of leisure and tourism development in the western side of the park, with limited facilities to the east. In this respect, there is an opportunity to help address the current imbalance between the two areas through the provision of high quality tourist and leisure facilities in the Water Park East.

Current Market

- 3.2.4 The current market context in the Water Park is primarily centred on a number of individual developments in the western portion of the park, which provide a range of self-catering accommodation with leisure facilities. However, the majority of these facilities are of a conventional nature offered either as second homes or for short-term holiday letting. The application proposals for Lakes 103, 103A and 104 represent a new form of accommodation that seeks to integrate fractional ownership of high quality units centred on a core of leisure facilities. It is important to note that this development will not be available for residential purposes.
- 3.2.5 In this respect, the proposals seek to further the tourism and leisure offer in the eastern portion of the Water Park whilst introducing a new high quality product to the area

**3.3 Consented Development in the Local Area**

- 3.3.1 There are two key consented schemes in the immediate area, which will need to be considered when assessing the cumulative effects and impact interactions of the proposed development. Table 3.1 below summarises the developments and their likely construction programme:

*Table 3.1: Consented development in the application area*

<b>Name and location of development</b>	<b>Summary of proposals</b>	<b>Likely construction programme</b>
Coln Park, Lechlade (Yoo Development)	Outline Consent for 160 holiday lodges, a hotel building and, a new country park centre adjacent to the A417	Initial phase completed. Second phase under construction.
Lake 105 (Fairford Water Ski Club)	Outline Consent for 20 log cabin style lodges	All constructed.

**3.4 Methodology for Assessing Alternative Locations**

Assessment Area

- 3.4.1 The starting point for the assessment of alternative locations is the identification of a suitable area of search. On the basis that the Water Park has previously been divided between its eastern and western sections centred on the A419(T), that the western section represents the most developed area, and that the District Council's present planning policy focus is on the development of the eastern section, it is considered appropriate that the assessment area should comprise the Water Park East. In this regard, the assessment area is defined as the Eastern Water Park area as set out in the District Council's SPG.

### Site Identification

3.4.2 The sites identified have been compiled as a result of desk-based assessment and on-site analysis, and principally comprise those areas of land either:

- Presently actively operated for mineral extraction;
- Partly or totally reclaimed and operated either for active or passive recreation (excluding sites that have been developed for tourist accommodation); and,
- Existing undisturbed land i.e. agricultural land.

### Comparative Analysis

3.4.3 The comparative analysis of each location identified is based on a combination of desk-top analysis and on-site assessment, which includes the following key elements:

- Assessment of existing and emerging planning policy position;
- Assessment of Development Control history (where relevant);
- Identification of existing landscape, environmental or ecological designations;
- Consideration of physical constraints such as access, flooding, topography, landscape and visual impact, and, overhead power lines;
- Availability of the site in terms of land ownership and present use i.e. mineral extraction;
- Accessibility/proximity to existing services, facilities, and transport infrastructure; and,
- Suitability of site in physical terms to accommodate development proposed i.e. site size and configuration, including proportion of water bodies that may be present.
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3.4.4 The assessment of each location on the basis of the above key considerations enables a conclusion to be drawn in respect of the potential alternative locations to the application site.

## **3.5 Summary of Existing Provision**

*(Fig 3.1 Existing Facilities)*

3.5.1 The current provision in the Eastern section of the Water Park is limited to the two key developments summarised in sub-section 3.3 above. In this respect, it is evident that the current level of existing tourist accommodation in the Eastern Water Park remains extremely limited, particularly when compared with the Western Water Park area.

### 3.6 Identification of Alternative Locations

3.6.1 The identification of alternative locations has sought to employ a sieving process that has included all potential areas of land within the Water Park east as a starting point. Those locations that were considered to represent areas of land subject to substantial and overriding constraints in relation to key issues such as access have been discounted from the second tier of sieving in the assessment. Those sites that are considered to represent a degree of potential as suitable locations have been assessed on the basis of the criteria set out in sub-section 3.4.3 above, and include the following areas of land:

- Area A: Land at Coln Park
- Area B: Land to the south west of Lechlade
- Area C: Horcott Hill
- Area D: Land to the north of Horseshoe Lake
- Area E: Land south of Whelford
- Area F: Area east of Whelford
- Area G: Land south of Bowmore Lake
- Area H: Land north of Kempsford
- Area I: Land east of Kempsford
- The application site – Lakes 103 and 104 and land at Milestone

3.6.2 The above areas of land are broadly identified in *Fig 3.2 Alternative Locations in relation to Existing Facilities*.

### 3.7 Comparative Analysis/Assessment of Alternative Locations

3.7.1 This sub-section sets out a summary of the comparative analysis undertaken in respect of each of the above alternative locations.

Table 3.2: Planning Policy

Site Ref	Site Location	CWP/SPG Zoning	Policy Designation
Area A	Land at Coln Park	Zone A & C	Adopted Local Plan: Cotswold Water Park (Policy UT.1) Adjacent to Settlement Protection Boundary (Policy UT.2)

Site Ref	Site Location	CWP/SPG Zoning	Policy Designation
Area B	Land to the south west of Lechlade	Zone A	Adopted Local Plan: Cotswold Water Park (Policy UT.1) Adjacent to Settlement Protection Boundary (Policy UT.2)
Area C	Horcott Hill	Zone B	Adopted Local Plan: Cotswold Water Park (Policy UT.1) Adjacent to Settlement Protection Boundary (Policy UT.2)
Area D	Land to the north of Horseshoe Lake	Zone A & B	Adopted Local Plan: Cotswold Water Park (Policy UT.1) Adjacent to Settlement Protection Boundary (Policy UT.2) Adjacent to Protected Road Corridor (Policy 36)
Area E	Land south of Whelford	Zone D	Adopted Local Plan: Cotswold Water Park (Policy UT.1) Partially adjacent/within Settlement Protection Boundary (Policy UT.2)
Area F	Area east of Whelford	Zone A & D	Adopted Local Plan: Cotswold Water Park (Policy UT.1) Partially adjacent/within Settlement Protection Boundary (Policy UT.2)
Area G	Land south of Bowmore Lake	Unzoned	Adopted Local Plan: Cotswold Water Park (Policy UT.1) Adjacent to Settlement Protection Boundary (Policy UT.2)
Area H	Land north of Kempford	Zone D	Adopted Local Plan: Cotswold Water Park (Policy UT.1) Partially adjacent/within Settlement Protection Boundary (Policy UT.2)
Area I	Land east of Kempford	Zone D	Adopted Local Plan: Cotswold Water Park (Policy UT.1) Partially adjacent/within Settlement Protection Boundary (Policy UT.2) Thames and Severn Canal Protection Line (Policy UT.3) Adjacent to Conservation Area (Policy 15)
The Application	Lakes 103, 103A and 104 and Milestone	Zone A, B, & C	Adopted Local Plan: Cotswold Water Park (Policy UT.1) Adjacent to Settlement Protection Boundary (Policy UT.2)

3.7.2 It is relevant to note that all of the above sites are also subject to the District Council's Supplementary Planning Guidance (SPG) for the Cotswold Water Park.

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3.7.3 The above assessment demonstrates that all of the phase 2 sites are situated within the Water Park boundary and are either within or adjacent to a settlement protection boundary area. In addition, a number of sites are situated within close proximity to a Conservation Area or abut the built-up area of neighbouring settlements. In policy terms all of the locations are considered potentially suitable for tourist or leisure development subject to any proposals respecting the character of the surrounding area and complying with the specific policy requirements for the Water Park, in particular the zoning of intensity of uses set out in the SPG.

3.7.4 In this regard, those sites that are presently zoned for passive uses i.e. Zones A and D are not considered suitable for active recreation and leisure and are also less likely to be suitable for accommodating built form. The following sites fall wholly within the passive Zones A and D and are therefore considered unlikely to be suitable for the type of built form/uses proposed:

- Area E: Land south of Whelford
- Area F: Area east of Whelford
- Area H: Land north of Kempsford
- Area I: Land east of Kempsford

### Development Control History

3.7.5 This sub-section of the site assessment identifies only recent Development Control history of relevance to the potential of the above sites to accommodate the type of tourist accommodation development/uses proposed. The planning history of relevance is summarised below in respect of each location:

*Table 3.3: Relevant Planning History*

Area	Relevant Planning History
A	See sub-section 3.3 above.
B	No known history of direct relevance
C	No known history of direct relevance
D	No known history of direct relevance
E	No known history of direct relevance
F	No known history of direct relevance
G	No known history of direct relevance
H	No known history of direct relevance
I	No known history of direct relevance

Application Site	Previous proposal for the comprehensive development of Lakes 103, 103a and 104 for tourism and recreation development comprising the erection of hotel/leisure complex (including 38 suites), 57 no. apartments and 143 no. pavilions, access, car parking, landscaping and ecological management. Appeal dismissed by Secretary of State on 23 April 2008.
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## Key Designations

- 3.7.6 An important consideration in relation to the assessment of potential alternative locations for the proposed development is the identification of key designations in terms of landscape quality, ecological and historical importance. In this regard an analysis of each location has been undertaken on the basis of information contained within the adopted and emerging Local Plan to provide an overview of the key environmental designations within the Cotswold Water Park eastern area. Those sites presently subject to landscape, environmental or historical designations are set out on the following page:

Table 3.4: Statutory Designations

Areas	Sites of Special Scientific Interest	Key Wildlife Sites	Regionally Important Geological Sites	Scheduled Ancient Monuments
A	X	X	X	✓ (LPA Ref: 459)
B	✓(1 site)	✓ (1 site)	X	X
C	X	X	X	X
D	X	X	X	X
E	X	X	X	X
F	X	✓ (1 site)	X	X
G	X	X	X	X
H	X	X	X	X
I	X	X	X	✓(LPA Ref: 349)
Application Site	X	X	X	X

## Physical Constraints

- 3.7.7 In addition to the identification of key environmental designations it is necessary to examine potential physical constraints to development, such as flooding, and topography. The table below summarises the key physical constraints in relation to each of the identified sites:

Table 3.5: Physical Constraints

Area	1 in 100 Year Floodplain	Topography	High Voltage Over-head Powerlines	Other Physical Constraints
A	✓	X	X	Public Right of Way

Area	1 in 100 Year Floodplain	Topography	High Voltage Over-head Powerlines	Other Physical Constraints
B	✓	X	X	
C	X	X	X	Public Right of Way
D	✓	X	X	
E	✓	X	X	End of runway/flight path for RAF Fairford Public Right of Way Adjacent to military fuel dump
F	✓	X	X	End of runway/flight path for RAF Fairford Public Right of Way
G	✓	X	X	Flight path for RAF Fairford Public Right of Way
H	X	X	X	Adjacent to military fuel dump Public Right of Way
I	✓	X	X	Public Right of Way Adjacent to military fuel dump
Application Site	✓ (in part)	X	X	Public Rights of Way

### Accessibility

3.7.8 An important consideration in the assessment of suitable locations, is the relative accessibility of each site in relation to existing services, facilities, and transport infrastructure, in order to ensure that any future development is located in the most sustainable and accessible location. The table below sets out a summary of the relative accessibility of each location in relation to services, facilities and transport infrastructure:

Table 3.6: Services, facilities and transport Infrastructure

Area	Direct Access onto Public Highway (class)	Distance to nearest settlement (name)	Distance to Fairford	Distance to Lechlade
A	✓ (A417)	Whelford 1.5km	3km	3.5km
B	✓ (A417)	Lechlade 0.5km	5km	0.5km
C	✓ (unclassified)	Fairford 1km	1km	7km
D	✓ (A361)	Lechlade 1.5km	8km	1.5km
E	✓ (unclassified)	Whelford 0.5km	3km	6km
F	✓ (unclassified)	Whelford 0km	3km	6km
G	X	Lechlade 1.5km	5.5km	1.5km

Area	Direct Access onto Public Highway (class)	Distance to nearest settlement (name)	Distance to Fairford	Distance to Lechlade
H	✓ (unclassified)	Kempsford 0.5km	4km	6km
I	✓ (unclassified)	Kempsford 0.5km	4.5km	6km
Application Site	✓ (A417)	Fairford 1km	1km	4.5km

*NB. All distances given are straight line unless otherwise stated.*

### Site Capacity

- 3.7.9 Having identified the key constraints, designations, policy considerations, and accessibility of each location it is necessary to examine the capacity of each location to accommodate the type and scale of development proposed, particularly in relation to internal features such as water bodies. In this respect, an assessment of each location has been undertaken that examines its overall area and any internal features that may reduce its capacity to accommodate the scale and type of development proposed. A summary of the observations made in respect of the capacity of each location is set out below:

*Table 3.7: Capacity*

Area	Observations
A	The site would appear to be relatively free from any substantial physical constraints to its capacity
B	Approximately ½ of the site area is presently occupied by a water body
C	Approximately ½ of the site area is presently occupied by water bodies, which are likely to expand as the existing mineral extraction continues
D	The majority of the site is occupied by water bodies with limited capacity around the lake margins
E	The whole area would appear free from any water bodies, however, the site is presently subject to mineral extraction and may therefore include lakes at a later stage in its use/development
F	The site is traversed by the River Coln, which represents a physical barrier through its central area
G	The River Coln and a number of tributaries pass through the site
H	The site would appear relatively free from any major physical constraints to its capacity
I	The whole area would appear free from any water bodies, however, the site is presently subject to mineral extraction and may therefore include lakes at a later stage in its use/development
Application Site	At least ½ of the site area is presently occupied by water bodies however there is adequate area around the lake margins and within the Milestone land to allow development to take place

### Site Availability

3.7.10 Following the above assessment of each location the final consideration is the availability of each location to deliver the type and scale of development proposed. For example, whilst a location may appear appropriate in terms of the considerations examined above, it may not be readily available for development in the short-term due to a range of potential reasons, such as land ownership and present use i.e. mineral extraction. In this regard a site that is not readily available for development in the short-term will not be considered suitable at the present time.

Table 3.8:

Area	Observations on Site Availability
A	This site is consented and under construction for lodge development. As such it no longer comprises a viable alternative location within the context of this assessment.
B	Partially agricultural land – ownership presently unknown
C	Hanson aggregates mineral extraction site (Horcott Workings)
D	Partially agricultural land – ownership presently unknown Predominantly water bodies
E	Aggregate Industries quarry
F	Aggregate Industries quarry
G	Agricultural land – ownership presently unknown
H	Agricultural land – ownership presently unknown
I	Aggregate Industries quarry
Area	Observations on Site Availability
Application Site	Owned by developer and presently available for immediate development

### 3.8 Summary

3.8.1 On the basis of the above assessment of potential alternative locations for the proposed development, the following summary observations can be made in respect of the suitability of each location.

Table 3.9: Summary

Area s	Observations on Each Location		Suitable for Proposed Development
	SPG Zones	General Observations	
A	✓		This site is consented and under construction for lodge development. As such it no longer comprises a viable alternative location within the context of this assessment.

Area	Observations on Each Location	Suitable for Proposed Development
B	✓ Presence of a SSSI represents a constraint to development The site is within the floodplain Well related to Lechlade although distant from Fairford Land ownership situated presently uncertain	The site is considered suitable for development however, its land ownership presently remains unknown and the land may not therefore be deliverable in the short-term.
C	✓ No known environmental, ecological or historical constraints Site not within the floodplain Presently in active use for mineral extraction	Whilst the site would appear suitable and relatively unconstrained, it is presently in active use for mineral extraction and will not therefore be available for development in the short-term.
D	✓ No known environmental, ecological or historical constraints Site within the floodplain Present ownership unknown Presence of lakes across the majority of the site limits its capacity for development and also increases its ecological potential	The site has limited capacity and its land ownership position remains unknown.
E	X The site is situated within a passive zone considered unsuitable for built-form	Not suitable
F	X The site is situated within a passive zone considered unsuitable for built-form	Not suitable
G	✓ No known environmental, ecological or historical constraints Site is within the floodplain The site has no direct access onto a public highway	The site has no direct access onto a public highway. Third party land would therefore be required, and in this respect it is not considered suitable in the short-term.
H	X The site is situated within a passive zone considered unsuitable for built-form	Not suitable
I	X The site is situated within a passive zone considered unsuitable for built-form	Not suitable

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Area	Observations on Each Location		Suitable for Proposed Development
Application Site	✓	<p>No known environmental, ecological or historical constraints</p> <p>The site is partially within the floodplain</p> <p>The site is well related to Fairford with good access to the trunk road network</p> <p>The site is owned by a developer and is available for immediate delivery</p> <p>The site has capacity for the type of development proposed</p>	<p>The site does have constraints however they are not considered to be overriding.</p> <p>The site is situated in a sustainable location with good road access.</p> <p>The site is readily available and can be delivered for development in the short-term.</p>

- 3.8.2 On the basis of the above summary table and the assessment of alternative locations within the Water Park east it is evident that whilst other potentially suitable locations do exist in the search area, the application site represents the only area that is both suitable and readily available for development in the short-term for the type and scale of development proposed. Furthermore, the application site is identified in the District Council SPG as a suitable location for the proposed type of development/uses.
- 3.8.3 In this respect, it is considered that the application site does represent the most appropriate location for the proposed development and that its delivery will not result in a more suitable/available location being overlooked. In addition, the application site is considered to be well related to the existing settlement of Fairford with good linkages onto the adjoining highway network and will enable the delivery of environmental and ecological enhancement that will benefit the existing community and economy.

## **4 PLANNING POLICY CONTEXT**

### **4.1 Introduction**

- 4.1.1 This section of the Environmental Statement provides an overview of the planning policy framework against which a planning application on the site will be assessed. It is important to note that the applicant's planning consultant (CPA) has already examined the planning policy framework and the evolution of the application proposals has therefore been informed by the relevant policy considerations. It is however considered appropriate to provide an overview of the key policy considerations within the context of the Environmental Statement.

### **4.2 National Policy**

#### **Planning Policy Statement 1 (PPS1) Delivering Sustainable Development (February 2005):**

- 4.2.1 PPS1 identifies the Government's objectives for the creation of sustainable communities and the delivery of the aims set out in the Sustainable Communities Plan (2003). PPS1 highlights the importance of new development proposals taking a holistic approach to ensure that all relevant considerations are addressed with an emphasis on sustainability and community involvement. The Government places great emphasis on the importance of pre-application discussions between applicants and LPAs, with particular focus on the need for consistency in advice provided and in the decision making process.

#### **Planning Policy Statement 7 (PPS7) Sustainable Development in Rural Areas (August 2004):**

- 4.2.2 PPS7 sets out the Government's aspirations in relation to sustainable development in Rural England and represents the most up to date planning policy guidance relating to planning in rural areas. In relation to tourism and leisure development, Paragraph 34 supports the concept of sustainable rural tourism and leisure developments that benefit rural communities and visitors and which utilise and enrich but do not harm the character of the countryside.
- 4.2.3 In specific relation to tourist accommodation, development proposals should seek to ensure that they are not prominent in the landscape and that any visual intrusion is minimised by effective high quality screening.
- 4.2.4 In addition, Paragraph 32 highlights the importance of public rights of way as recreational facilities, and encourages the use of opportunities to provide better facilities for walkers, cyclists and horse riders.

**Planning Policy Statement 9, Biodiversity and Geological Conservation (PPS9) (August 2005)**

- 4.2.5 PPS9 sets out the Government's vision for conserving and enhancing biological diversity. The Government is concerned that biodiversity is conserved and enhanced as an integral part of economic, social and environmental development. Open spaces in urban areas that are used by wildlife and valued by people are recognised to contribute towards a better quality of life and sense of well-being for those who live and work in urban areas.

**Planning Policy Guidance Note 13, Transport (PPG13) (March 2001)**

- 4.2.6 PPG13 sets out the Governments objectives for the integration of transport and development in order to ensure sustainable patterns of transportation, with an emphasis on maximising opportunities for sustainable modes of travel such as walking, cycling and the use of public transport.

**Planning Policy Guidance Note 16, Archaeology and Planning (PPG16) (August 2001)**

- 4.2.7 PPG16 sets out the Government's policy on archaeological remains on land and how they should be preserved or recorded in both urban and countryside settings. PPG16 also recognises the irreplaceable and finite nature of archaeological remains, and provides advice to LPAs and developers on how to address the issue of archaeology as part of development proposals.

**Planning Policy Guidance Note 17, Planning for Open Space, Sport and Recreation (PPG17) (July 2002).**

- 4.2.8 PPG17 sets out the Government's aspirations in relation to planning for sport and recreation, and the provision of public open space. In relation to sport and recreation requiring natural features and water, Paragraph 31 states that:

*"Where these features exist, local authorities should recognise their actual and potential recreational value, possibly to more than the local population. Planning permission should be granted but only where the impact of sports and recreational activities on natural features can be minimised. Facilities should be planned carefully to ensure that conflicts between sport and recreational activities and other interests do not arise. In considering planning applications for development near water, local authorities should ensure that access for sport and recreation purposes is not restricted and should, where possible, be enhanced. The visual amenity, heritage and nature conservation value of water resources should also be protected."*

- 4.2.9 **The Good Practice Guide on Planning for Tourism published in May 2006** replaced Planning Policy Guidance Note 21 *Planning for Tourism*, which was cancelled in September 2006. The Good Practice Guidance outlines the key material considerations that a Local Planning Authority should take into account when determining an application for tourism related development.

**Planning Policy Guidance Note 24, Planning and Noise (PPG24) (October 1994)**

- 4.2.10 Sets out advice on how the planning system can be used to minimise the adverse impact of noise without placing unreasonable restrictions on new development.

**Planning Policy Statement 25, Development and Flood Risk (PPS25) (December 2006)**

- 4.2.11 PPS25 identifies the Government's policy in relation to reducing the risk to people, the developed and natural environment from flooding. In this respect, proposals for development should ensure that any risk from flooding is minimised and in particular relation to proposals within floodplain areas, the function of that floodplain should not be impeded by development proposals.
- 4.2.12 The **PPS25 Good Practice Guide** (June 2008) is intended to support and facilitate the implementation of the Government's national planning policies on development and flood risk as outlined in PPS25 and provides advice on applying the sequential and exception tests when Local Planning Authorities consider development proposals.

### **4.3 The South West Region**

- 4.3.1 Following the commencement of the Planning and Compulsory Purchase Act 2004 (28 September 2004), Section 38(3) amends the definition of the constituent parts of the Development Plan, which now includes Regional Spatial Strategies when adopted and also the current adopted Regional Planning Guidance. In this respect and although not set out in detail here, the proposed development has evolved having full consideration to adopted Regional Planning Guidance 10 – South West (October 2001), as now forming part of the Development Plan for the area, together with the emerging South West Plan (RSS) which is due for publication in Summer 2009, following consultation on the Secretary of State's proposed changes which ended on 24 October 2008.

### **4.4 Strategic Policy**

- 4.4.1 The current Structure Plan comprises the Gloucestershire Structure Plan, adopted in November 1999, which has a plan period until 2011. Certain Policies within the Structure Plan have been 'saved' by a Direction issued by the Secretary of State in September 2007, which

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extends the life of the policies for a further three years.

4.4.2 In relation to development within the Cotswold Water Park, Policy NHE.8 in the adopted Structure Plan states that:

*“Proposals for development in the Cotswold Water Park should be considered in the context of all the objectives of the Water Park, which include the:*

- Nature conservation interests;
- Mineral extraction and the beneficial after-use of worked sites;
- Facilitation of a wide range of recreation and tourism opportunities which reflect the special character of the area;
- Facilitation of access to and within the Cotswold Water Park using sustainable modes of transport;
- Protection of the integrity of existing villages and rural communities; and
- Protection of the best and most versatile land”

4.4.3 In this respect, the County Council has recognised the importance of the Cotswold Water Park in terms of its unique ability as an arena for a wide range of sport and recreation activities, particularly water based recreation using the lakes.

4.4.4 In addition to the above, those saved policies and proposals within the adopted Structure Plan considered to be of particular relevance to the proposed development are set out below, and considered in relation to the relevant sections of this Environmental Statement:

- Policy S.1                      Bulk of New Development
- Policy S.5                      Community Services and Infrastructure
- Policy S.6                      Local Character and Distinctiveness
- Policy S.7                      Environmental Quality of Development
- Policy T.1                      New Development and the Transport System
- Policy T.2                      Walking
- Policy T.3                      Cycling
- Policy T.4                      Public Transport
- Policy T.8                      Car Parking Provision in New Development

- Policy NHE.1 Development and the Environment
- Policy NHE.2 Nature Conservation and Biodiversity
- Policy NHE.6 Historic Environment
- Policy NHE.8 Cotswold Water Park
- Policy RE.3 Public Access to the Countryside
- Policy RE.4 Water Based Recreation
- Policy TSM.1 Sustainable Tourism
- Policy TSM.2 Self Catering Accommodation
- Policy TSM.3 Self Catering Accommodation
- Policy TSM.4 Tourist Attractions
- Policy WM.1 Water Resources
- Policy F.1 Flooding and Flood Risk

## 4.5 Local Policy

(Fig 4.1 Planning Designations)

### **Adopted Local Plan:**

- 4.5.1 The current Local Plan comprises the Cotswold District Local Plan, which was formally adopted in 25 April 2006 and sets out the framework for development in the District until 2011. All the policies contained within the Local Plan are valid in full until 25 April 2009, with all but 14 policies 'saved' beyond this date following a Direction issued by the Secretary of State on 19 January 2009.
- 4.5.2 It is worthy of note that Policy 4 *Environmental Impact*, Policy 6 *The Water Environment* and Policy 12 *Sites of Archaeological Interest* will not be saved beyond 25 April 2009. However, given that they have remained extant during the preparation of this Environmental Statement, appropriate regard has been had to their content.
- 4.5.3 The application site is situated outside of the defined built-up area, within the countryside and the Cotswold Water Park on the Local Plan Proposals Map.
- 4.5.4 In this respect, it is considered that any proposals for the future re-use/development of the site for recreation, sport and tourist accommodation purposes should be assessed against the following policies:

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- Policy 1 Natural Resources
- Policy 4 Environmental Impact (expires after 25 April 2009)
- Policy 6 The Water Environments (expires after 25 April 2009)
- Policy 9 Biodiversity, Geology and Geomorphology
- Policy 10 Trees, Woodlands and Hedgerows
- Policy 11 Historic Landscapes
- Policy 12 Sites of Archaeological Interest (expires after 25 April 2009)
- Policy 19 Development Outside Development Boundaries
- Policy 24 Employment Uses
- Policy 32 Community Facilities
- Policy 36 Sustainable Transport Network
- Policy 38 Accessibility to and within New Development
- Policy 42 Cotswold District Design Code
- Policy 45 Landscaping in New Development
- Policy 49 Planning Obligations and Conditions
- Policy UT.1 Cotswold Water Park
- Appendix 2 Key Wildlife Sites

4.5.5 Policy UT.1 of the Local Plan sets out the framework for development in the Cotswold Water Park and follows a criteria based approach to the consideration of proposals for water-based sport, recreation and tourism.

4.5.6 Development proposals should ensure the following criteria are satisfied:

- the maintenance or enhancement of the nature conservation importance of the Water Park, particularly in relation to the lakes and associated habitats listed in the Cotswold Water Park Biodiversity Action Plan, which may involve measures to enhance the long term conservation value of a site that is the subject of an application for planning permission or other land and/or water within the Water Park;
- where appropriate, habitat enhancement and the creation of new habitats, which may involve measures to enhance the long term conservation value of a site that is the subject of an application for planning permission or other land and/or water within the Water Park;

- the retention and, where appropriate, the enhancement of existing landscape features that contribute to the character and/or appearance of the site subject to an application;
- the design and siting of new buildings being sympathetic to the character of the area and avoiding harm to the landscape;
- the development having a direct relationship to the use of the Water Park for nature conservation, water-based sport, tourism and recreation;
- the prevention of the over-dominance of one particular activity, or type of provision, or the significant reduction in the choice of sites available for uses and activities that are not adequately provided for within the Cotswold Water Park; and
- the provision of appropriate contributions towards the maintenance of the nature conservation importance of the Water Park, habitat enhancement and the creation of new habitats, and the overall management of the Water Park.

4.5.7 In addition to Policy UT.1, the District Council has published Supplementary Planning Guidance (November 1999) to further guide development proposals in the Water Park. The SPG sets out the Council's approach in respect of identifying zones for appropriate types of development across the park. The zoning approach is summarised below:

**Zone A – Quiet Zones:**

- Low intensity uses, which protect the residential amenities of settlements and enhance the quiet enjoyment of the countryside;
- Appropriate uses will include nature reserves, walking and riding. In some instances fishing will be acceptable; and,
- New buildings will not normally be acceptable.

**Zone B – Low Intensity Recreation Zones:**

- A variety of uses will be acceptable provided there is no significant noise creation or traffic nuisance;
- Appropriate uses will include sailing, fishing, windsurfing, rowing, canoeing and, in some instances water skiing; and,
- Low density and small-scale caravan/camping sites will be acceptable including small private clubs.

**Zone C – Sport, Recreation and Tourism:**

- Medium to high intensity uses will be acceptable provided there is adequate access to the site;
- Appropriate uses will include tourist attractions if they have an affinity with the purpose, character and natural history of the Water Park; and,
- New holiday accommodation will also be acceptable.

**Zone D – Agriculture and Forestry:**

- The restoration of land to agriculture and forestry, the creation of woodland, lakes, marsh, and other dry or wetland habitats for nature conservation management;
- Provision should be made for additional public access, picnic sites, car parking areas, footpaths, cycleways, and bridleways; and,
- The creation of wetland areas will not be acceptable within the vicinity of RAF Fairford due to problems associated with bird-strike.

4.5.8 The SPG summarised above represents a material consideration in the determination of any planning application on land falling within the Cotswold Water Park area, and has been used by the District Council since its adoption for Development Control purposes.

4.5.9 The application proposals the subject of this Environmental Statement have been prepared in accordance with the broad advice contained within the SPG and seek to deliver a number of direct environmental benefits to the lakes whilst concentrating built form around the lakes and within those zones considered (by the District Council) to represent the most appropriate locations i.e. Zones B and C.

4.5.10 A summary of the key benefits arising from the application proposals is set out below. This schedule is not exhaustive on the basis that the key environmental and planning benefits are discussed in detail in the remaining chapters of this Environmental Statement:

- Habitat creation and enhancement on western half of Lake 104;
- Enhancement of habitat along lake margins of Lakes 103, 103A and 104 and on land at Milestone;
- Protection of key landscape features within and around the application site;
- Use of environmentally sustainable building techniques (where practicable);
- Enhancement of lakes as flood control measure within floodplain;
- Formalisation of public rights of way and upgrading of pedestrian/cycle routes to

Fairford;

- Provision of new leisure facilities available for local community use;
- Employment creation arising from leisure complex and onsite servicing; and,
- Introduction of new tourist product into eastern section of Water Park.

**Emerging Local Development Framework:**

- 4.5.11 The District Council has commenced a new Local Development Framework in accordance with the Planning and Compulsory Purchase Act 2004, and is preparing Local Development Documents for the period up to 2026.
- 4.5.12 In November 2007, the Council published the Core Strategy Issues and Options Paper which set out the spatial vision, objectives and strategy for the development of the District. Following revisions to Planning Policy Statement 12 *Local Spatial Planning* in June 2008 where the Development Plan Document Preferred Options Stage was removed, the Council now expects to produce the Proposed Submission Core Strategy Document for publication and consultation in March 2010. There are no specific policies in relation to the Cotswold Water Park contained within the Core Strategy Issues and Options Paper due to the broad range of topics that are covered.