

20th April 2026

Dear Councillor,

RE: Planning Application Ref: PL/2023/03359

These representations, objecting to the above application, are submitted on behalf of the new owners of the Holcim Production Plant at North End Works, South Cerney (formerly Aggregate Industries). They are submitted on behalf of our client North South Land who became the new owners recently.

We note with concern that the application is recommended for approval notwithstanding the range of issues raised through consultation responses and the significant level of objection. We do not wish to reiterate the considerable number of points made by consultees and third-parties about the absence of sufficient technical information to accompany the proposal however do wish to make certain observations.

In particular, the Officer's assessment appears to rely in a large part on the presumption around the continued operation of North End Works as an industrial site when defining or addressing context. This is particularly the case when considering likely landscape and visual effects on our client's site. This is not a reasonable or justified assumption as work will very shortly commence to explore potential alternative uses on the site. The likelihood is that alternative future uses will be far more susceptible both visually and from amenity and heath perspective to potential impacts arising from the application site.

The North End Works site represents a previously developed (brownfield) opportunity with obvious potential for redevelopment, including for residential uses.

As acknowledged in the Committee Report (pages 79–80), existing contextual influences do not negate the landscape and visual harm identified by the Council's Landscape Officer. The introduction of a substantial industrial facility would add to this harm and further erode the character of the area. This is particularly important given the realistic prospect of a more sensitive residential use on the North End Works site, which could be prejudiced by the proposed development. We do not consider the Council can therefore weigh the "planning balance" on the application with any great certainty without having consulted with Holcim beforehand as to their intentions around the site on the North End Works for the next 25 years.

Whilst not a committed change of use within the radius of influence from the site, the potential for influence of some impacts from the application site has been set aside on the basis of the North End Site's manufacturing operation being in situ in perpetuity. As an industrial production tied business, the North End Works has an operational lifespan and so, in time, technical impacts from the proposed Digester plant will be relevant to any alternative future use of that site. We ask that be taken into account.

We also reserve the right to make comment on whether there is sufficient information in the application to assess the impact of the Digester plant on a future use for the North End Works site, in particular with reference to proximity to bio-aerosol emissions and EA licensing considerations.

In summary, the application relies on incorrect assumptions regarding the future context of adjoining land which creates uncertainty in respect of environmental and amenity impacts. The proposal risks prejudicing the delivery of an appropriate and sustainable form of development in this location.

For these reasons, we raise a strong objection and respectfully request that planning permission is refused.

Yours sincerely,

Edward Leeson

Principal Planner, Origin3

CC Cllr Chuck Berry