Dawn Lloyd Tewkesbury Borough Council Gloucester Road Tewkesbury Gloucestershire GL20 5TT



By email only to: developmentapplications@tewkesbury.gov.uk

22 October 2020

Dear Dawn

APPLICATION NO: 20/00079/PRE

DESCRIPTION: Conversion of curtilage barn to residential development. Alterations to vehicular

access.

LOCATION: Coopers Hill House, Coopers Hill, Brockworth, Gloucester, Gloucestershire

Thank you for consulting the Cotswolds Conservation Board ('the Board') on this pre-application consultation request.

The proposed development would be located within the Cotswolds National Landscape.¹ The local planning authority (LPA) has a statutory duty to have regard to the purpose of conserving and enhancing the natural beauty of the National Landscape.³ The Board recommends that, in fulfilling this 'duty of regard', the LPA should ensure that any pre-application advice: (i) is consistent with relevant national and local planning policy and guidance; and (ii) gives explicit consideration to the following Board publications:

- Cotswolds Area of Outstanding Natural Beauty (AONB) Management Plan 2018-2023 (link);
- Cotswolds AONB Landscape Character Assessment (<u>link</u>), particularly, in this instance, with regards to Landscape Character Type (LCT) 2 (Escarpment);
- Cotswolds AONB Landscape Strategy and Guidelines (<u>link</u>), particularly, in this instance, with regards to LCT 2 (<u>link</u>), including Sections 2.2, 2.3 and 2.8;
- Cotswolds AONB Local Distinctiveness and Landscape Change (<u>link</u>);
- Cotswolds Conservation Board Position Statements (<u>link</u>).

The proposed development is located in a particularly sensitive location, not only in a prominent location on the Cotswold escarpment within the Cotswolds National Landscape, but also directly adjacent to:

- Common land / access land (Section 15 of the Countryside and Rights of Way Act 2000);
- Cotswold Commons and Beechwoods Site of Special Scientific Interest (SSSI);
- Cotswold Beechwoods Special Area of Conservation (SAC).

Cotswolds Conservation Board

The Old Prison, Fosse Way, Northleach Gloucestershire GL54 3JH 01451 862000 info@cotswoldsaonb.org.uk The Cotswolds National Landscape is a designated Area of Outstanding Natural Beauty (AONB), managed and looked after by the Cotswolds Conservation Board.

cotswoldsaonb.org.uk

Chairman:
Brendan McCarthy
Vice Chair:
Rebecca Charley

Indeed, the applicant's drawings indicate that the south side of the proposed western extension would extend beyond the current site boundary, closer to – and potentially into – the above designations. It is not clear is earthworks would be required in these designations in order to construct the proposed dwelling.

The frontage of the proposed western extension does not appear to be in keeping with the frontage to the existing barn as it would have a much larger window area. The large size of this window makes it likely that the dwelling would emit a significant level of light pollution onto the escarpment and, potentially, into the Vale of Gloucester.

When seen from the road in front of the property, the proposed extension would be perceived to 'fill in' the gap between Hillside Cottage and Cooper's Hill Cottage. This would create the effect of a continuous 'wall' of housing extending approximately 45m from the east side of Hillside Cottage to the west side of Cooper's Hill House.

The proposed extension would also increase the footprint of the existing barn structure by more than 50%, which is a significant increase.

Therefore, the Board recommends that, if the applicant intends to proceed to submitting a planning application, the proposal should be amended by removing the proposed extension. We recommend that a simpler, two-bedroom dwelling that doesn't require an extension would be more appropriate than the current proposal.

It is also worth noting that the proposed dwelling is located in close proximity to the Cotswold Way National Trail and other public rights of way and in the setting of the Scheduled Monument of High Brotheridge Camp.

Taking all of the above points into account the Board recommends that any future planning application should include a comprehensive Landscape and Visual Appraisal as well as an assessment of the potential impact of the proposed development on the designations outlined above.

Any further pre-application advice from the Board would be charged at a rate of £70/hour. However, it is worth noting that the Board is unlikely to have capacity to provide any further pre-application advice on this proposal.

Yours sincerely,

John Mills

Planning & Landscape Lead

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NOTES:

- 1) Cotswolds National Landscape is the new name for the Cotswolds Areas of Outstanding Natural Beauty (AONB). The new name takes forward one of the proposals of the Government-commissioned 'Landscapes Review' to rename AONBs as 'National Landscapes'. This change reflects the national importance of AONBs and the fact that they are safeguarded, in the national interest, for nature, people, business and culture.
- 2) The Board's main consultation thresholds are:
 - (i) Schedule 1 development under the Town and Country Planning (Environmental Impact Assessment) (EIA) Regulations 2017. (Link).
 - (ii) Schedule 2 development under the EIA Regulations, above the 'applicable thresholds and criteria'. (Link).
 - (iii) Major development, as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015 (Part 1, Article (2) (1)) (<u>link</u>), including:
 - a. Minerals and waste development.
 - b. Housing development of 10 or more dwellings.
 - c. Buildings with a floor space of 1,000 square metres or more.
 - d. Sites having an area of 1 hectare or more.
 - (iv) Isolated homes in the countryside (i.e. developments that meets the requirements of paragraph 79 of the National Planning Policy Framework (NPPF)).

The Board applies these consultation criteria thresholds in order to most effectively prioritise its limited planning-related resources. However, it should not be implied that development proposals below these thresholds do not have the potential to have significant adverse impacts on the purpose of AONB designation.

3) Section 85 of the Countryside and Rights of Way Act 2000. (Link).