



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

By email only to: [developmentapplications@tewkesbury.gov.uk](mailto:developmentapplications@tewkesbury.gov.uk)

11 November 2020

Dear Dawn

**APPLICATION NO:** 20/00838/FUL

**DESCRIPTION:** Erection of a replacement dwelling and detached garage.

**LOCATION:** Merlewood, Coopers Hill, Brockworth

Thank you for consulting the Cotswolds Conservation Board ('the Board') on this proposed development, which would be located within the Cotswolds National Landscape.<sup>1</sup>

The type and / or scale of the proposed development is below the Board's main consultation thresholds.<sup>2</sup> However, we are concerned that the proposed development, which would replace a single-storey dwelling with a two-storey dwelling in a visually prominent and highly sensitive location, has the potential to have a significant adverse effect on the natural beauty of the National Landscape.

The proposed development is located on the Cotswold escarpment, within the Cotswolds National Landscape, and directly adjacent to:

- The Cotswold Way National Trail and multiple other public rights of way (as well as a car parking area for visitors using these public rights of way);
- 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).

It is also in the setting of the Scheduled Monument of High Brotheridge Camp, which is approximately 115m away.

We acknowledge that the applicant's Design & Access Statement provides a basic visual impact assessment. However, we do not consider this assessment to be adequate. For example, rather than clarifying the likely visual impact of the proposed two-storey dwelling, it just emphasises that the current single-storey dwelling is not prominent in the landscape.

Given the sensitive location of the site and the fact that it is directly adjacent to the Cotswold Way National Trail, we recommend that the applicant should be required to undertake a more comprehensive Landscape and Visual Appraisal. This should include photomontages of the proposed replacement dwelling.

In reaching its planning decision, 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.<sup>3</sup> The Board

**Cotswolds Conservation Board**

The Old Prison, Fosse Way, Northleach  
Gloucestershire GL54 3JH  
01451 862000  
[info@cotswoldsaonb.org.uk](mailto: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](http://cotswoldsaonb.org.uk)

*Chairman:*  
**Brendan McCarthy**  
*Vice Chair:*  
**Rebecca Charley**

recommends that, in fulfilling this 'duty of regard', the LPA should: (i) ensure that planning decisions are consistent with relevant national and local planning policy and guidance; and (ii) give explicit consideration to the following Board publications:

- Cotswolds Area of Outstanding Natural Beauty (AONB) Management Plan 2018-2023 ([link](#));
- Cotswolds AONB Landscape Character Assessment ([link](#)), particularly, in this instance, with regards to Landscape Character Type (LCT) 2 (Escarpment);
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)), particularly, in this instance, with regards to LCT 2 ([link](#));
- Cotswolds AONB Local Distinctiveness and Landscape Change ([link](#));
- Cotswolds Conservation Board Position Statements ([link](#)).

Yours sincerely,

A handwritten signature in black ink that reads "John Mills". The signature is written in a cursive style with a long, sweeping underline.

John Mills  
Planning & Landscape Lead  
[john.mills@cotswoldsaonb.org.uk](mailto:john.mills@cotswoldsaonb.org.uk) | 07808 391227

## 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)) ([link](#)), 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](#)).