

24th April 2020

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GL20 5TT



By email only to catherine.ashby@teiwkesbury.gov.uk

Dear Catherine

20/00107/FUL - Demolition of an existing agricultural workers dwelling and the erection of an open market replacement dwelling of exceptional quality design - Buckland Manor Farm, Buckland, Broadway, Worcestershire WR12 7LY

Thank you for consulting the Cotswolds Conservation Board ('the Board') on the above planning application. The Board objects to the proposed development.

The Board acknowledges that the proposed development is of a *high* quality design and has the potential to deliver a number of benefits, including the naturalising of the existing grounds (as highlighted in the review response of the Gloucestershire Design Panel). The Board also acknowledges that visual impacts for users of local footpaths, including the Cotswold Way, are likely to be limited due to the existing, intervening vegetation.

However, the Board considers that the proposed development:

1. Does not meet the requirement, under paragraph 79 of the National Planning Policy Framework (NPPF), for the design to be of *exceptional* quality. In particular, it is not sufficiently sensitive to the defining characteristics of the local area.
2. Does not meet the requirement, under Policy SD7 of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy, for the proposed development to be consistent with the policies set out in the Cotswolds AONB Management Plan.

In particular, the Board considers that the proposed development would:

- be excessive in scale for the local landscape character;
- not adequately respect local distinctiveness and character, including local building styles and materials;
- have an adverse impact on the tranquillity and dark skies of the Cotswolds AONB;
- have an adverse visual impact for receptors in the Conservation Area of Buckland - including users of the Winchcombe Way, Buckland Manor Hotel and St Michael's Church – and for receptors on the footpath on Burhill Iron Age Hillfort.

These issues are particularly significant given the highly sensitive location of the proposed development on the Cotswolds escarpment, which is one of the 'special qualities' of the Cotswolds Area of Outstanding Natural Beauty (AONB).

Conserving, enhancing, understanding and enjoying the Cotswolds Area of Outstanding Natural Beauty

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Further information relating to these issues is provided in Annex 1, below.

If you have any queries regarding the Board's response, please do not hesitate to get in touch.

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 that extends to the right.

John Mills MRTPI
Planning and Landscape Officer

ANNEX 1. ADDITIONAL INFORMATION RELATING TO THE COTSWOLDS CONSERVATION BOARD'S COMMENTS ON PLANNING APPLICATION 20/00107/FUL

LOCAL DISTINCTIVENESS

Local Distinctiveness – scale and settlement patterns

The applicant's Design and Access Statement assert that '*the location is suitable for a house of this size*'. However, the Board strongly disagrees with this assertion.

The proposed dwelling is approximately three times larger than the existing dwelling. It would cover an area of approximately 600-700m². This is equivalent in scale to the 15 bedroom Buckland Manor Hotel.

The applicant's Design and Access Statement draws comparisons with the isolated farmsteads in the local vicinity. The Cotswolds AONB Landscape Character Assessment identifies '*isolated farms and dwellings in sheltered positions mid-way up the escarpment*' as one of the 'key features' of the Escarpment landscape character. However, the dwellings on these farmsteads (as opposed to the agricultural buildings) appear to be considerably smaller than the proposed dwelling at Buckland Manor Farm. Given this difference in scale, the proposed dwelling is not likely to be compatible with the local landscape character in this regard.

The Design and Access Statement also draws comparisons with the existing paragraph 79 dwelling at Headlands, Prestbury. The clear inference is that there Tewkesbury Borough has already approved a paragraph 79 dwelling on the Cotswold escarpment in the Cotswolds AONB. However, Headlands dwelling is considerably smaller than the proposed dwelling at Buckland Manor Farm, covering an area of approximately 480m² and consisting of just a single storey. This scale of development is more in keeping with the scale of isolated dwellings in the local vicinity. As such, the Headlands dwelling is not comparable with the proposed development.

The Board considers that the scale of the proposed dwelling is excessive, in terms of the context of the local landscape character. As such, it is not consistent with paragraph 172 of the NPPF which states that the scale and extent of development in AONBs should be limited. Whilst this requirement is perhaps more commonly applied to larger scale housing developments, the Board considers that it is equally applicable in this context.

Given that the proposed dwelling is excessive in scale, it would also not be consistent with local settlement patterns (i.e. the scale of the isolated farm dwellings compared to the scale of the local settlements).

The fact that this larger scale dwelling might still not be seen from certain viewpoints (or only to a limited degree) does not reduce the adverse impact of this increase in scale on landscape character.

Local Distinctiveness – materials

The Board acknowledges that the proposed dwelling would incorporate local Cotswold stone. However, the vast majority of the wall area would be either timber (chestnut) cladding

or windows. The Cotswolds stone would constitute a relatively small proportion of the wall space on the ground floor. The dwelling does not incorporate Cotswold stone roofing tiles.

This is a particularly important issue given that one of the special qualities¹ of the Cotswolds AONB is *'the unifying character of the limestone geology – its visible presence in the landscape and use as a building material'*. As such, for the proposed development to meet the requirements of paragraph 79 of the NPPF, the Board considers that use of local Cotswold stone should be a much more prominent feature of the proposed dwelling.

Local Distinctiveness – building styles

The Board acknowledges that the existing dwelling might not be of particular merit, in terms of design. However, it does, at least, include some of the key features of the local Cotswold vernacular architecture, such as a steep pitched roof, mullioned windows, detailed window surrounds and roof tiles that diminish in size from the eaves to the ridge.

In contrast, the proposed dwelling features none of these locally distinctive, Cotswold vernacular building styles. This is a particularly important issue given that one of the special qualities of the Cotswolds AONB is the *'distinctive settlements, developed in the Cotswold vernacular'*.

As such, for the proposed development to meet the requirements of paragraph 79 of the NPPF, the Board considers that these locally distinctive, Cotswold vernacular building styles should be a much more integral component of the proposal. This should incorporate locally distinctive features of the dwellings found in the historic core of the Buckland Conservation Area and in isolated dwellings in the local area that are listed buildings.

Cotswolds AONB Management Plan / Joint Core Strategy

Policy CE3 (Local Distinctiveness) of the Cotswolds AONB Management Plan 2018-2023 states that development proposals in the AONB should be *'designed ... to respect local settlement patterns, building styles, scale and materials'*.

Whilst Policy CE3 welcomes 'innovative designs', it specifies that these should be *'informed by local distinctiveness, character and scale'*.

Given the comments outlined above, the Board does not consider that the proposed development is consistent with this policy.

Policy SD7 of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) requires development in the AONB to be consistent with the policies of the Cotswolds AONB Management Plan. Given that the proposed development is not consistent with the policies of the AONB Management Plan, it is also not consistent with the policies of the JCS.

DARK SKIES AND TRANQUILLITY

Dark Skies

¹ The 'special qualities' of the AONB are those aspects of the area's natural beauty which make the area distinctive and which are particularly valuable, especially at a national scale. They are the key attributes on which the priorities for its conservation, enhancement and management should be based.

Not only is the proposed dwelling three times larger than the existing dwelling, a significant proportion of the wall area is occupied by windows. This is likely to result in a significant increase in the level of light pollution from the site at night time.

This, in turn, is likely to have a significant adverse impact on the 'dark skies' of the AONB, which are one of the AONB's 'special qualities'. It would also be contrary to Policy CE5 (Dark Skies) of the Cotswolds AONB Management Plan 2018-2023 which states that:

- Proposals that are likely to impact on the dark skies of the Cotswolds AONB should have regard to these dark skies by seeking to (i) avoid and (ii) minimise light pollution.
- Measures should be taken to increase the area of dark skies in the Cotswolds AONB by (i) removing and (ii) reducing existing sources of light pollution.

The issue of dark skies is also flagged up in the Cotswolds AONB Landscape Strategy and Guidelines (LSG). The LSG identifies '*isolated development such as new single dwellings on the mid escarpment slopes*' as a 'local force for change'. One of the undesirable 'potential implications' of this 'force for change' is the '*introduction of 'lit' elements to characteristically dark escarpment scope landscapes*'. The LSG recommends protecting the '*unlit character of the escarpment*'. The Board considers that the proposed development is not consistent with the LSG in this regard.

Policy 10 (Development and Transport – Principles) of the Cotswolds AONB Management Plan states that:

- Proposals...in the Cotswolds AONB...should be compatible with...the Cotswolds AONB Landscape Strategy and Guidelines.

Therefore, given that the proposed development is not compatible with the LSG it is also not consistent with the AONB Management Plan. By extension, it is also not consistent with the JCS.

More guidance and information on the topic of dark skies is provided in the Board's Position Statement on Dark Skies and Artificial Light.²

Tranquillity

In addition to increase light pollution, the large window area of the proposed dwelling is also likely to increase levels of 'glint' (i.e. reflected sunlight) from the site, also known as the 'heliographic effect'. This issue is highlighted in the Board's Tranquillity Position Statement (Section 5.2), which recommends that:

- *Measures should be taken to avoid or minimise the reflection of sunlight off surfaces, for example, by using a less reflective surface and by positioning relevant development in a less intrusive position and / or location.*

² <https://www.cotswoldsaonb.org.uk/our-landscape/position-statements-2/>

Given the increased levels of 'glint', the proposed development is also likely to adversely affect the tranquillity of the AONB. Any adverse impacts on the tranquillity of the AONB are particularly significant given that tranquillity is one of the 'special qualities' of the Cotswolds AONB.

Policy CE4 (Tranquillity) of the Cotswolds AONB Management Plan states that:

- Proposals that are likely to impact on the tranquillity of the Cotswolds AONB should have regard to this tranquillity by seeking to (i) avoid and (ii) minimise noise pollution and other aural and visual disturbance.
- Measures should be taken to enhance the tranquillity of the Cotswolds AONB by (i) removing and (ii) reducing existing sources of noise pollution and other aural and visual disturbance.

The issue of 'glint' is also raised in the LSG as one of the undesirable 'potential implications' of isolated development.

The Board considers that the proposed development is not compatible with the LSG or the Tranquillity Position Statement. As such, it is not consistent with the policies of the Cotswolds AONB Management Plan. By extension, it is also not compatible with the JCS.

Adverse visual impact

The applicant's Design and Access Statement emphasises the increased level of visual connectivity that the proposed dwelling would provide to Buckland (in particular, St Michael's Church), compared to the existing building. This would partly be a result of locating the proposed dwelling in a location that is more closely aligned with the centre of the valley and with the approach road.

Increasing the visual connectivity to Buckland is also likely to mean that the proposed dwelling will be more visually prominent from the village than the existing dwelling. The modern design of the proposed dwelling is not likely to be visually compatible with the historic setting of St Michael's Church, Buckland Manor and the Buckland Conservation Area. The fact that the Winchcombe Way passes through Buckland makes these visual impacts more significant.

The proposed dwelling would also be more visually prominent for receptors on the footpath on Burhill Iron Age Hillfort, compared to the existing dwelling.

For these reasons, the proposed dwelling is likely to increase adverse visual impacts compared to the existing dwelling.