

4th January 2019

Kate Beauchamp
Case Management Officer
Stroud District Council

By email to Kate.Beauchamp@stroud.gov.uk / stroud@prospero-planning.co.uk



Dear Kate

S.17/2729/FUL. Conversion and refurbishment of the former Standish Hospital complex to form 48 dwellings, development of 98 new build homes, etc.

Thank you for inviting the Cotswolds Conservation Board (the Board) to comment on the above planning application. The Board maintains its **objection** to this planning application.

When considering this planning application, the Board has distinguished between: (i) the conversion and refurbishment of the former hospital complex to form 48 dwellings; and (ii) the additional development of 98 new build homes. Whilst we acknowledge that the delivery of (i) partly depends on funds arising from (ii), it is the scale and location of the additional housing that is the main issue.

As indicated in our previous response, dated 13th July 2018, the Board supports the principle of redeveloping this site by means of bringing the historic complex of buildings back into suitable, viable and sustainable use. However, the Board still has serious concerns about the scale and location of the additional housing that is proposed and the impacts that this would have on the Cotswolds Area of Outstanding Natural Beauty (AONB). These concerns are reinforced by the District Council's independent evaluation of the applicant's Landscape and Visual Impact Assessment (LVIA), with this evaluation identifying significant adverse landscape and visual impacts, as outlined in Annex 1.

These findings further reinforce the Board's view that the the proposed development would constitute major development, in the context of paragraph 172 of the National Planning Policy Framework (NPPF).

One of the major development 'tests' required by the NPPF is to assess the cost of, and scope for, developing outside the AONB. With this in mind, one of the key recommendations that the Board made in its previous objection was for an assessment to be undertaken of the scope for developing the additional 98 new build homes outside the AONB. The aspiration behind this recommendation was that the profits from developing the 98 new build homes outside the AONB could still be used to support the conversion and refurbishment of the former Standish Hospital complex to form 48 dwellings.

Unfortunately, the applicant's response to our objection has failed to address this issue. Instead, their response focussed on the more extreme scenario of locating all of the development outside the AONB, such that there would be no redevelopment of the hospital complex. This is clearly not the scenario that we asked to be assessed.

Another of the major development tests required in paragraph 172 of the NPPF is an assessment of the need for the development. In the context of this planning application, this should include a justification for additional development of 98 new build homes. The

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applicant has indicated, in its response to our previous objection, that this is the minimum amount required to enable the conversion and restoration of the hospital complex. However, the applicant did not provide additional information to support this assertion.

Recommendations:

- Before a decision is made on the planning application:
 - the applicant should:
 - assess the potential to deliver the additional 98 new build homes outside the AONB whilst still using profits from this additional new build to 'enable' the conversion and restoration of the hospital complex;
 - provide evidence that 98 new build homes is the minimum that is required to enable the conversion and restoration of the hospital complex.
- The planning application should not be granted planning permission, in its current form, unless the applicant can demonstrate that there is no scope to reduce the number of proposed new build houses and that there is no scope to develop any of the additional 98 new build homes outside the AONB.
- If the planning application is granted planning permission:
 - The development should be required to implement the mitigation measures outlined in the Board's Landscape Strategy and Guidelines for Landscape Character Type 2 (Escarpment).
 - All of the proposed mitigation measures should be rigorously implemented and enforced.
 - Additional funding should be secured through the development to further conserve and enhance the natural beauty of the AONB (for example, by paying a sum to the Cotswolds Conservation Board in continuing support of its management plan objectives).

Further supporting information is provided in Annex 1, below.

Should you require any further clarification on any of the points raised above please do not hesitate to contact me.

Yours sincerely



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ANNEX 1. Further information in support of the Cotswolds Conservation Board's response to planning application S.17/2729/FUL.

Adverse Effects

The District Council's independent evaluation¹ of the applicant's Landscape and Visual Impact Assessment (LVIA) identified that:

- The methodology used in the LVIA is likely to lead to a downplaying of likely significant effects and, as a result, the assessed landscape and visual impacts in the LVIA are less than would be expected.
- There are significant adverse local landscape effects and a larger number of significant adverse visual effects.
- There are adverse effects on the special qualities of the Cotswolds AONB (albeit with some balancing factors).
- The proposed development would make the built form more visible, especially in the short term (as a result of development on the site being extended and the removal of secondary trees and vegetation).
- The quantum and modern nature of the proposed new build development would be out of character with the relatively sparse rural pattern of development on the scarp slope.
- There would be additional movement of vehicles, lighting from street lights and houses (with their very large rear windows) and a resultant reduction in tranquillity.

Major Development

In their response² to the Board's previous objection to this development, the applicant has questioned if the proposed development constitutes 'major development', in the context of paragraph 172 of the NPPF. This assertion is based on '*the condition of the existing site being previously developed and containing a number of large scale buildings*' and the applicants view that '*the proposed development is not predicted to result in any significant adverse impacts on the AONB*'.

However, the Board strongly believes that the proposed development *would* constitute major development. This view is reinforced by the findings of the District Council's independent evaluation of the applicant's LIVA, as outlined above.

Footnote 55 of the NPPF states that '*whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined*'.

The proposed development lies on the Cotswold escarpment, which is a highly sensitive landscape. It proposes a significant scale of development, including 98 new build homes, and the District Council's evaluation identifies that it would have significant adverse landscape and visual impacts. As such, it clearly merits major development status. It is worth noting that the Footnote 55 criteria relates to whether the development *could* have a significant adverse impact (i.e. whether it *has potential* to have a significant adverse impact).

¹ White Consultants (2018) *Evaluation of Proposals and Assessment of Landscape and Visual Effects*. Final report for Stroud District Council.

² Planit IE (2018) *Standish House – response to objections of Natural England and the Cotswolds Conservation Board*. Report for PJ Livesey Group.

It does not need to be proven that the development *would* have a significant adverse impact in order for it to merit major development status.

The applicant has suggested that the provision of housing means that the development constitutes exceptional circumstances and is in the public interest. However, any housing development could potentially argue that it is contributing to meeting housing needs, so this factor should not be deemed to be 'exceptional circumstances'.