

1st May 2019

Catherine Ashby
Development Management Team Leader
Tewkesbury Borough Council
Gloucester Road
Tewkesbury
GL20 5TT



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

Dear Catherine

SCREENING OPINION REQUEST (Ref: 19/00001/SCR)
Proposal: Residential development for up to 125 dwellings
Location: East of Delavale Road, Winchcombe

Thank you for consulting the Cotswolds Conservation Board ('the Board') on this Screening Opinion request.

The Board considers that the proposed development *is* likely to have significant effects on the environment and, therefore, recommends that it should be subject to an Environmental Impact Assessment (EIA).

The reasons for reaching this conclusion are outlined below.

The scale of the proposed development (125 dwellings and larger than 5 hectares) is significant in the context of both: (i) Winchcombe (particularly the element of Winchcombe within the Cotswolds Area of Outstanding Natural Beauty (AONB)); and (ii) the wider AONB. For example, the proposed development, combined with existing housing commitments, would increase the number of dwellings in Winchcombe by 21% compared to the 2011 baseline.

In comparison to the Winchcombe Site B allocation in the draft Tewkesbury Borough Plan (which overlaps to a large degree with the current site and which was considered to have a moderate effect on views), the proposed development:

- has 66% more dwellings (i.e. 125, compared to 75 for Site B);
- has a density of housing that is 40% higher than for Site B (i.e. 19.8% dwellings per hectare (dph), compared to 14.2 dph for Site B) – this density of housing means that:
 - it would be harder to provide a 'feathered' edge with sufficient and appropriate planting;
 - development is more likely to be packed up to the boundaries, providing a hard, suburban edge to the settlement.
- extends beyond the 115m contour (proposed as the boundary for the allocations in the draft Tewkesbury Borough Plan) up to the 125m contour, making it more visually prominent;
- extends further beyond the current settlement boundary and closer to the steep slopes of Langley Hill;
- has very linear edges, which cut across the contours of the hill, and right-angled corners, compared to the sinuous boundary of Site B which would have positively accentuated the topography of hillside.

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

Cotswolds Conservation Board Fosse Way Northleach Gloucestershire GL54 3JH

Tel: 01451 862000 Fax: 01451 862001 Email: info@cotswoldsaonb.org.uk

Website: www.cotswoldsaonb.org.uk

From this information, it is clear that the potential impacts of the current proposal are likely to be more significant than the impacts of the Site B allocation. As such, the 'magnitude of change' is likely to be high (or at least medium). A medium or high magnitude of change combined with a high (visual) sensitivity will result in an important (or significant) effect.

The negative aspects of the current proposal, outlined in the bullet points above, are contrary to the guidance in the Cotswolds AONB Landscape Strategy and Guidelines for Landscape Character Type 1 (Escarpment Outliers).

The level of traffic generated by a development of 125 dwellings in this location is likely to further exacerbate the already significant levels of congestion in Winchcombe, especially during peak 'rush hour' times. In addition, the proposed development could have significant direct and indirect impacts upon Cleeve Common Site of Special Scientific Interest (SSSI) and Dixon Wood Special Area of Conservation (SAC). Potential impacts, both direct and indirect, on nearby Scheduled Monuments also need to be fully assessed.

The Board considers the proposed development to constitute major development, in the context of paragraph 172 and footnote 55 of the National Planning Policy Framework (NPPF). Planning permission should therefore be refused unless it can be demonstrated that exceptional circumstances apply and that the development would be in the public interest.

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

Yours faithfully,

A handwritten signature in dark ink, reading '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 BOARDS COMMENTS ON THE EIA SCREENING OPINION REQUEST (REF:

Background

The proposed development lies within the Cotswolds Area of Outstanding Natural Beauty (AONB), which is classed as a 'sensitive area' under Regulation 2 of the Town and Country Planning (Environmental Impact Assessment Regulations) 2017 ('the EIA Regulations').

The proposed development would constitute an 'urban development project' under Schedule 2(10)(b) of the EIA Regulations. As the AONB is a 'sensitive area', the thresholds and criteria specified for Schedule 2¹ development do not apply. Therefore, the local planning authority has to decide if the development is '*likely to have significant effects on the environment by virtue of factors such as its nature, size or location*'².

In reaching this decision, the LPA should take into account the selection criteria set out in Schedule 3³ of the EIA Regulations, which relate to the:

- Characteristics of the development
- Location of the development
- Types and characteristics of the potential impact

The Board's comments on these three topics are outlined below.

Characteristics (including size and cumulative impact with other development)

The proposed development is a residential development of up to 125 dwellings. In the context of the Cotswolds AONB, the Board considers that a development of this scale would be significant and that it would constitute 'major development' in the context of paragraph 172 and footnote 55 of the National Planning Policy Framework (NPPF). In particular, it is important to note that the paragraph 172 of the NPPF explicitly states that '*the scale and extent of development within these designated areas should be limited*'.

It is also worth noting that the development is larger than 5ha. Outside of an AONB, this would exceed the Schedule 2 threshold and, therefore, trigger the EIA screening process. However, within the AONB, where the Schedule 2 thresholds and criteria do not apply, it represents a significant scale of development.

As well as considering the scale of the development in its own right, it is also necessary (under Schedule 3 of the EIA Regulations) to consider '*cumulation with other existing development and / or approved development*'. Tewkesbury Borough Council's 'Housing Background Paper' clarifies that the number of dwellings in Winchcombe at the beginning of the Plan period, in 2011, was 1,931⁴. It also clarifies that there is an existing commitment of 277 dwellings (since the start of the Plan period), bringing the total number of dwellings to 2,208. The proposed development of 125 dwellings would increase the number of dwellings by 6.5% compared to the 2011 baseline or 5.7% compared to the 2011 baseline plus existing commitments.

¹ <http://www.legislation.gov.uk/ukxi/2017/571/schedule/2/made>

² <http://www.legislation.gov.uk/ukxi/2017/571/regulation/2/made>

³ <http://www.legislation.gov.uk/ukxi/2017/571/schedule/3/made>

⁴ Tewkesbury Borough Council (2018) *Tewkesbury Borough Plan 2011-2031. Preferred Options Consultation Housing Background Paper*. Appendix D. ([Link](#))

It is also appropriate to consider the overall scale of growth since 2011. For example, the existing commitment of 277 dwellings already represents a significant 14.3% increase compared to the 2011 baseline. If the current proposal is added to the existing commitments (i.e. 402 dwellings in total), this would represent a 20.8% increase compared to the 2011 baseline.

When considered in this context, the proposed development forms a significant part of a much larger cumulative impact. In this context, the proposed development is likely to have significant effects on the environment by virtue of its scale.

Location of the development

The proposed development is located on the western edge of Winchcombe, at the foot of Langley Hill. It is directly adjacent to the current settlement edge, which extends along the eastern boundary of the proposed development and half way along its southern boundary.

The Board's Landscape Character Assessment identifies Langley Hill, including the location of the proposed development, as being Landscape Character Type (LCT) 1B (Escarpment Outliers – Langley Hill). The Cotswolds AONB Landscape Strategy and Guidelines identifies this landscape as being highly sensitive to change.

The Winchcombe Landscape and Visual Sensitivity Study (WLVSS), which was undertaken as part of the evidence base for the Tewkesbury Borough Plan, included an assessment of the proposed allocation 'Winchcombe Site B', which overlaps to a large degree with the site of the current proposed development. The WLVSS concluded that the overall landscape sensitivity of this specific site is moderate, given that the site abuts the existing settlement edge, and that the overall visually sensitivity is high. The Board agrees with these conclusions.

The potential impacts of the proposed development on LCT 1B – and in relation to the landscape and visual sensitivity of this specific location - are outlined in the next section.

Types and characteristics of the potential impact

The developer claims that *'the proposal would not have a significant, unacceptable impact in relation to landscape considerations given the landscape evidence base that forms part of the emerging Tewkesbury Borough Plan'*. Presumably, their opinion is based on the WLVSS, which concluded that, for the proposed Winchcombe Site B allocation, the impact on landscape character would be 'low adverse' and that the effect upon views would be 'moderate adverse' (based on a combination of high sensitivity and low magnitude of change).

However, there are a number of important differences between the proposed Site B allocation and the current proposed development:

- Site B proposed 75 dwellings across 5.3 hectares (ha), providing an average density of 14.2 dwellings per ha (dph), whereas the current proposal has 125 dwellings across 6.3ha, providing an average density of 19.8 dph. This equates to a 66% increase in the number of dwellings and a 40% increase in density.
- Site B proposed restricting development to below the 115m contour line, whereas the site boundary of the current proposal extends up to the 125m contour line, making it more visually prominent.
- The Site B western boundary follows the sinuous 115m contour line, thereby positively accentuating the topography of the hillside. The western boundary of the

current proposal, on the other hand, extends further beyond the current settlement boundary. It very linear edges, which cut across the contours of the hill, and right-angled corners. As such, it would intrude more negatively into the landscape.

- Site B has a 'feathered' edge, thereby avoiding a harsh, linear edge formed by rear garden fences. New hedge and copse planting would soften the new settlement edge further. However, the significantly increased density of housing in the current proposal calls into question the potential to provide a feathered edge or to provide sufficient and appropriate planting. It also makes it more likely that development will be crammed right up to the boundaries, resulting in a hard, suburban edge to the settlement.

From this information, it is clear that the current proposal does not comply with the assumptions that were made in the WLVSS (i.e. having the sinuous 115m contour as the western boundary, feathered edges, space for sufficient and appropriate screen planting, etc.). It is also clear that the potential impacts of the current proposal are likely to be more significant than the impacts of the Site B allocation. It is unlikely that the adverse impacts could be adequately mitigated.

Given these more significant impacts, the magnitude of change is likely to be high (or at least moderate), not 'low'. As outlined in the WLVSS (paragraph 2.4 and Table 2.7), a high (or medium) magnitude of change combined with a high (visual) sensitivity, will result in an important (or significant) effect.

The negative aspects of the current proposal, outlined in the bullet points above, are also contrary to the Cotswolds AONB Landscape Strategy and Guidelines⁵ for LCT1.

The Board is concerned about the potential impacts of the proposed development on the tranquillity of the AONB. In particular, the level of traffic generated by a development of 125 dwellings in this location is likely to further exacerbate the already significant levels of congestion in Winchcombe, especially during peak 'rush hour' times.

The Board supports Natural England's concerns that the proposed development could have significant direct and indirect impacts upon Cleeve Common Site of Special Scientific Interest (SSSI) and Dixon Wood Special Area of Conservation (SAC).

There are also several Scheduled Monuments in close proximity to the proposed development (for example, Winchcombe Abbey, at a distance of approximately 300m). The potential impacts of the proposed development on these Scheduled Monuments, including indirect impacts such as traffic, needs to be fully assessed.

⁵ Cotswolds Conservation Board (2016) *Cotswolds AONB Landscape Strategy and Guidelines*. ([Link](#)).