



Ben Warren
Planning: Place and Growth
Cheltenham Borough Council
PO Box 12, Municipal Offices
Promenade
Cheltenham
GL50 1PP

By email only to: ben.warren@cheltenham.gov.uk

20 December 2021

Dear Ben,

APPLICATION NO: 21/02693/FUL

DESCRIPTION: Single storey, two-bedroom, self-build retirement dwelling

LOCATION: Land Adjacent Lillybrook Golf Club, Cirencester Road, Charlton Kings, Cheltenham, Gloucestershire

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

Having reviewed the information submitted, the Board **objects** to this application as we consider that the applicant has not demonstrated that the proposal would be compatible with the statutory purpose of conserving and enhancing the natural beauty of the Cotswolds National Landscape, including its landscape and scenic beauty. The planning authority has a statutory duty to have regard to this purpose and must give great weight to conserving and enhancing the landscape and scenic beauty of the National Landscape.

The applicant outlines in their Planning Statement that the site was recently subject to a Permission in Principle (PiP) application (reference: 21/01773/PIP). This was refused by the Council in September 2021 due to the location being outside of the Principal Urban Area and conflict with Joint Core Strategy (JCS) policy SD10, along with a lack of information to enable the Council to conclude whether any harm to the AONB would arise from the development. This in turn would not permit the Council to consider that the 'tilted balance' outlined at paragraph 11d)ii) of the National Planning Policy Framework could be engaged, due to the Council's admission that it could not demonstrate a 5-year supply of deliverable housing.

Lack of assessment of landscape and visual impact

Whilst the applicant's Planning Statement states at paragraph 4.3 that "*the development can be achieved without harm to the AONB; and if anything will enhance the AONB*", no further evidence is provided to support, or enable an objective assessment of, this statement. The information submitted in support of the application is limited to a small number of basic plans and although the Planning Statement acknowledges that the Cotswolds AONB is a "*protected asset of significant importance*" (paragraph 4.3), no assessment of the proposal is made against any national or local planning policies relating to landscape matters, including JCS Policy SD7, or relevant landscape guidance such as the Cotswolds AONB Landscape Character Assessment, in this instance with regards to Landscape Character Type 2, Escarpment.

Cotswolds Conservation Board

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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

Whilst a full LVIA would clearly not be required due to the scale of the proposal, no attempt has been made to describe the local landscape character, assess the baseline landscape and visual contribution of the current buildings to the protected landscape of the AONB or assess the potential impact of the new bungalow, the degree of change that would occur and the degree of harm which may arise from the proposal.

Scale of development

One particular area of concern is that the applicant has not submitted any information relating to the heights of the current buildings on the site or any sections of the current or proposed development which would aid in assessing the potential impact of the new bungalow and its visibility from the A435. Photos 1 and 2 included at page 3 of the Planning Statement show that the ridge heights of the existing sheds are not significantly higher than the small van parked next to them and therefore they appear to be approximately 2-2.5m in height. The proposed bungalow is almost double this height at c.4.75m (as shown in dwg. no. 0683/P/001) and is located at a higher point than the current buildings given the sloping nature of the site which forms part of the Cotswolds escarpment. As such, the Board considers that further information is required to demonstrate the height and impact of the new bungalow compared to the existing buildings, principally when viewed from the A435.

Landscaping

No information has been provided to demonstrate how the residential curtilage of the bungalow will be established, what its extent will be and how the potential visual clutter of domestic paraphernalia will be minimised across the grassland field. There is also no information on boundary, surfacing or landscaping treatments. The Proposed Block Plan (dwg. no. 0683/P/004) shows a rough shaded area marked as providing "*native species tree and shrub*" planting to "*act as a screen*" but no further detailed information is provided on species type, number to be planted or maturity to help assess whether this tree and shrub planting will establish an adequate screen between the site and the A435.

Lighting

No details regarding lighting have been submitted by the applicant. Any lighting would introduce a 'lit element' into what would otherwise be a relatively dark night-time landscape.

The Cotswolds AONB Landscape Strategy & Guidelines for LCT 2 (Section 2.2) identifies 'the introduction of lit elements to characteristically dark landscapes' as a potential (adverse) implication for isolated development such as this. The guidelines seek to 'conserve areas of dark skies', with these dark skies being one of the 'special qualities' of the Cotswolds National Landscape.

Accordingly, further information, particularly on any external lighting, is required to demonstrate adherence to this guidance and, by extension, with the policies of the Cotswolds AONB Management Plan in particular Policy CE5 (Dark Skies). It is also noted that the bungalow is oriented so that the full length windows/patio doors of the living room face directly out to the AONB.

Recommendation

Therefore, the Board requests that the applicant is asked to provide further information to address the Board's concerns outlined above and submit a Landscape and Visual Appraisal that clearly assesses potential adverse and beneficial effects of the development, at a level that is proportionate to the proposed development, and demonstrate that the proposal will conserve and enhance the natural beauty of the AONB. Consideration should be given as to whether the development would impact receptors on the Cheltenham Circular Footpath particularly where it passes in front of the site

on the A435, but also where it rises up the escarpment to the east and below Hartley Hill and also from the Cotswold Way.

Further guidance can be found within the following documents²:

- 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](#)), including Section 2.2;
- Cotswolds AONB Local Distinctiveness and Landscape Change ([link](#));
- Cotswolds Conservation Board Position Statements ([link](#)) particularly, in this instance, with regards to the Tranquillity Position Statement ([link](#)), Housing Position Statement ([link](#)), Landscape-led Development Position Statement ([link](#)) and also the Dark Skies and Artificial Light Position Statement ([link](#)) and its appendices ([link 1](#), [link 2](#), [link 3](#))

Please do not hesitate to contact me if you wish to discuss this response.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S. Joyce', with a small dot at the end.

Simon Joyce

Planning Officer

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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 documents referred to in our response can be located on the Cotswolds National Landscape website under the following sections
 - a. Cotswolds Area of Outstanding Natural Beauty (AONB) Management Plan 2018-2023
www.cotswoldsaonb.org.uk/management-plan
 - b. Cotswolds AONB Landscape Character Assessment
www.cotswoldsaonb.org.uk/lca
 - c. Cotswolds AONB Landscape Strategy and Guidelines
www.cotswoldsaonb.org.uk/lsg
 - d. Cotswolds AONB Local Distinctiveness and Landscape Change
www.cotswoldsaonb.org.uk/ldlc
 - e. Cotswolds Conservation Board Position Statements
www.cotswoldsaonb.org.uk/ps1
www.cotswoldsaonb.org.uk/ps2