



Isobella Howell
Development Services
Tewkesbury Borough Council
Gloucester Road
Tewkesbury
GL20 5TT

By email only to: Isobella.Howell@teewkesbury.gov.uk

16 February 2022

Dear Isobella,

APPLICATION NO: 22/00031/FUL

DESCRIPTION: Demolition of a commercial manufacturing and storage building (Use Classes B2 and B8) and the erection of a single storey detached dwelling with associated parking and access

LOCATION: Yew Tree Farm, Bushcombe Lane, Woodmancote

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

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.² The Board 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) take into account 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 Escarpment ([link](#));
- Cotswolds AONB Local Distinctiveness and Landscape Change ([link](#));
- Cotswolds Conservation Board Position Statements ([link](#)) particularly, in this instance, with regards to Tranquillity ([link](#)) and Dark Skies and Artificial Light Position Statement ([link](#)) and its appendices ([link 1](#), [link 2](#), [link 3](#)).

Having reviewed the applicant's submission, the Board wishes to **object** to the 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 and as such that the application conflicts with the requirements of policy SD7 of the Joint Core Strategy.

This is particularly in respect of the potential adverse impact of light spill and reflective glare from the extensively glazed northwest and southwest elevations, which has not been properly assessed by the submission. The Board would therefore welcome a revised design reducing the glazed area to address these issues. The Board also wishes to raise separate issues relating to the principle of development and landscaping which are discussed in the Annex below.

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

Without prejudice, if the local authority is minded to grant planning permission, we recommend that pre-commencement planning conditions are imposed. These would require the approval of a detailed hard and soft landscaping scheme to demonstrate the mitigation of any adverse landscape and visual impacts and an enhancement of the National Landscape. If any external lighting is proposed, a lighting strategy scheme should be required detailing location and specification of the lighting supported by contouring plans demonstrating any light spill and ensuring that all lighting will be limited to low-level, down-facing lights.

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

Yours sincerely,

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

Simon Joyce
Planning Officer

simon.joyce@cotswoldsaonb.org.uk | 07808 391227

ANNEX 1. COTSWOLDS NATIONAL LANDSCAPE CONSULTATION RESPONSE IN RELATION TO PLANNING APPLICATION 22/00031/FUL

Principle of development

The applicant discusses the principle of development at length in their Design & Access Statement including reference to a number of previous appeal decisions. They also state that the site lies outside of the settlement boundary proposed in the draft Tewkesbury Borough Plan through Policy RES2. Outside of these settlement boundaries, Policy RES3 stipulates that new residential development will only be acceptable if it falls within a specified criteria of development types (for example, it would be a replacement dwelling) or involves development through local initiatives including Community Right to Build Orders and Neighbourhood Development Orders. The applicant acknowledges that the current application would not comprise residential development fitting within any of the listed exceptions and the proposal would therefore conflict with Policy RES3.

The applicant outlines at paragraph 6.3 of the Planning Statement how the Borough Plan has been submitted for examination and that the plan and Policy RES2 and RES3 can only be afforded 'moderate' weight at this time. Then, at paragraph 4.22 of the same document, the applicant also states that the Borough Plan's housing policies are the subject of unresolved objections and therefore carry 'little' weight. However, the Board wishes to highlight that the Tewkesbury Borough Plan has now at an advanced stage of its preparation, having progressed through the Main Modifications consultation stage following examination hearings in 2021 and the receipt of the Inspector's Interim Report in 16 June 2021. In his letter, the Inspector did not advise that any changes to the proposed settlement boundary at Woodmancote or that amendments to Policy RES3 were required to find the plan 'sound'. We also note that the Council's report on Main Modifications Consultation Responses and Council Comments ([link](#)) demonstrates that Policy RES2, in respect of the settlement boundary at Woodmancote, and Policy RES3 are not subject to significant outstanding objections.

Bearing in mind the above and in line with the advice given at paragraph 48 of the NPPF, the Board considers that given the advanced stage of the Borough Plan's preparation and the absence of unresolved objections to both Policies RES2 (in respect of the settlement boundary proposed for Woodmancote) and RES3, these should be given substantial weight as material considerations in the determination of this application and the applicant correctly admits that the proposal would conflict with them.

Design and Lighting

The Board acknowledges that the proposed dwelling would occupy largely the same position as the current commercial building and although the proposed dwelling has a slightly larger footprint, the height of the proposed dwelling is less than the existing barn.

The Cotswolds AONB Landscape Strategy & Guidelines for LCT 2 (Section 2.1) identifies 'the spread of lit elements up the Escarpment slope' and 'Potential for glint from buildings, particularly on hillsides' as potential (adverse) implications for 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. This is particularly important in an area with relatively low levels of light pollution such as this, as indicated in Appendix 1 of the Board's Tranquillity Position Statement, referred to above.

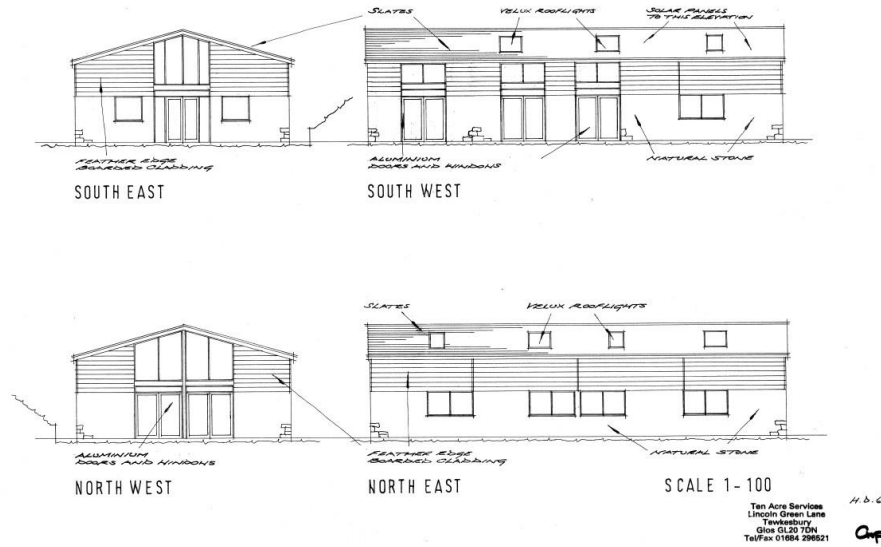
As such, the introduction of any lit elements should be designed to adhere to this guidance and, by extension, with the policies of the Cotswolds AONB Management Plan in particular Policy CE5 (Dark Skies) as well as the ILP Guidance Note for Reduction of Obtrusive Light and the CfDS Good Lighting Guide which form Appendices B and C of the Board's Dark Skies & Artificial Light Position Statement (linked above).

The northwest and southwest elevations as well as the rear garden look out over fields and the development will be visible from local Public Rights of Way (e.g. Woodmancote Footpaths 8 and 10), albeit against the backdrop of existing development. The proposed dwelling features more than 20 separate full length glazed panels (windows and doors) on these elevations, as well as a number of sky lights in the roof in an attempt to maximise both solar gain and views for the future occupiers. The Board is concerned at the potential for light spill and glow from these elevations; the amount of glazing appears excessive in this sensitive and relatively exposed location on the escarpment.

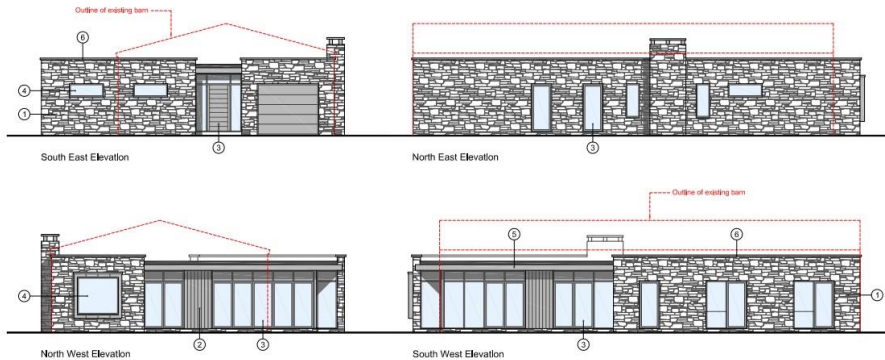
There is also the potential issue of reflective glare which may be created by the large glazed areas particularly at sunset from the southwesterly elevation.

In particular, the Board notes the previous application on this site (appn. ref. 16/01310/FUL) to convert two barns to residential use. This included the barn proposed to be demolished in this application, referred to as Barn A in that application. This application was refused by the Council and the subsequent appeal then dismissed (appeal ref. APP/G1630/W/17/3187211) due to the proposal's harm to the character and appearance of the area and to the landscape character of the AONB. At paragraph 9 of his appeal decision, the Inspector states *"The large new openings and extensive areas of glazing would stand out in this existing setting. In views through the site access from Bushcombe Lane the introduction of large areas of glazing would signal a significant change in the character and appearance of Barn A"*. Whilst we recognise that the Barn A proposal was two-storey whilst this proposed dwelling is single storey, when comparing the proposed elevations of the two schemes (shown below) which would be seen in public views from the northwest and southwest, this proposed dwelling features more full-length glazed windows and doors than the previous proposal. Any night-time light emitted from the dwelling through these elevations and from the roof lights would be seen across a wide area and from a substantial distance and this would not be compatible with the objective of conserving and enhancing the dark skies of the Cotswolds National Landscape.

VIEW TREE FARM, BUSHCOMBE LANE, WOODMANCOTE, CHELTENHAM, GLOS. ELEVATIONS AS PROPOSED - BARN A.



16/01310/FUL Barn A Elevations as proposed



- ① Coursed local stone
- ② Grey fire cement vertical cladding
- ③ Grey powder coated aluminium doors
- ④ Grey powder coated aluminium windows
- ⑤ Grey powder coated aluminium fascias
- ⑥ Grey powder coated aluminium caps/soffits

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H Davies Part Parcel 335B, Bushcombe Lane, Woodmancote						
Proposed Elevations						
DATE	NO	SCALE	STATUS	APP'D	DATE	BY
July 2021	1100 @ A3	GMP	PA	HDS19/01	26	-

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22/00031/FUL Elevations as proposed

The Board therefore recommends that the LPA requests that the applicant reviews the layout and elevations of the proposal, reduce the expanse of the glazed elements and provides a further assessment on this matter to address this concern before the application is determined.

It is also noted that the applicant has also provided no details on any external lighting and the Board requests clarification on this matter.

Landscaping

It is also noted that the application only proposes the retention of the current post and rail fencing rather than providing additional mitigative planting or boundary treatments. Moreover the applicant has not provided any detailed landscaping proposals to illustrate how the visual impact of the new dwelling and the potential negative addition of domestic paraphernalia in garden areas will be minimised or how the proposal can further contribute towards the conservation and enhancement of the landscape and scenic beauty of the National Landscape.

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) Section 85 of the Countryside and Rights of Way Act 2000.
www.legislation.gov.uk/ukpga/2000/37/section/85
- 3) 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