

Martin Perks
Cotswold District Council
Trinity Road
Cirencester
GL7 1PX



By email only to: Martin.Perks@cotswold.gov.uk

17 February 2022

Dear Martin,

APPLICATION NO: 22/00140/FUL

DESCRIPTION: Change of use of existing dwelling and erection of extensions to create 40-bedroom hotel and associated works

LOCATION: Grafters, Fosseyway, Lower Slaughter, Cheltenham, Gloucestershire, GL54 2EY

The above planning application, which is for a development that would be located within the Cotswolds National Landscape¹, has been brought to the attention of the Cotswolds Conservation Board.

Having reviewed the information submitted, the Board wishes to raise a **holding objection** to this application as we consider that the potential impacts of the proposal on the Cotswolds National Landscape have not been adequately assessed and this proposal requires further assessment and justification from the applicant.

The information submitted in support of the application is limited to a small number of basic plans, a basic two-page Flood Risk Assessment and a Planning Statement which offers no assessment of the application against any Development Plan policies (in particular Policies EC1, EC3, EC11, EN1, EN4, EN5 and EN14 of the Cotswold Local Plan 2011-2031) or other material planning considerations. Moreover, apart from a brief mention in the Planning Statement, no detailed assessment of the potential highways, landscape and visual, ecological, arboricultural or heritage impacts has been provided and there is no supporting Design and Access Statement.

Lack of assessment of landscape and visual impact

The Board is concerned that the application makes no mention of the fact that the site is located within the Cotswolds National Landscape, does not assess the proposal against any national or local planning policies relating to landscape matters, in particular Cotswold Local Plan Policies EN4 and EN5, and provides no justification of whether and how the proposal will conserve and enhance the natural beauty of the National Landscape.

Whilst a full LVIA may 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 AONB landscape or assess the potential impact of the extensions and associated development, the degree of change that would occur and the degree of harm which may arise from the proposal.

The Board also requests that photomontages (rather than CGIs) are provided of the likely view from the Fosse Way (from the entrance point), including one of the site in its present state and one with

Cotswolds Conservation Board

The Old Prison, Fosse Way, Northleach
Gloucestershire GL54 3JH
01451 862000
info@cotswoldsaonb.org.uk

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

the approved EV car park/service area but without this proposal to provide a meaningful comparison of the potential impact of the proposal.

Highways

No Transport Statement has been provided to allow an adequate assessment of the additional traffic implications of the development as well as to provide a comparison against current baseline conditions and those likely if the approved EV car park/service area was completed and fully operational. Whilst paragraph 2.22 of the Planning Statement states that *“Given the parking area capacity and the fact that the frequency of traffic movement for the approved EV station would be greater than those associated to the hotel, even operating to phase 2 level with the hotel in situ traffic movements on and off the site would be at a lower frequency than that already considered and approved during the EV station application”*, no justification for this view is provided.

The Board also notes that the approved car park / service area proposal makes provision for a bus stop area, although the applicant didn't propose that a bus service would be implemented as part of that planning application. The bus stop area is not shown in the plans for this application and the Board would ask the applicant to clarify this matter. Loss of the proposed bus stop would potentially reduce the sustainability of the site, for example, in terms of people who stay in the hotel being more likely to use their cars to travel to Stow or Bourton-on-the-Water.

Need/Justification

Policy EC1 of the Cotswold Local Plan 2011-2031 will permit employment development where it, inter alia, *“supports sustainable tourism in ways that enables the District to attract higher numbers of longer-stay visitors”* whilst Policy EC3 requires a justified business case, demonstrating that the business is viable to be provided for new employment-generating uses outside of Development Boundaries. Policy UE1 of the Cotswolds AONB Management Plan 2018-2023 is also of relevance to this application. Paragraph 3 states that *“visitors should be provided with a range of type and priced accommodation options that are compatible with conserving and enhancing the natural beauty of the AONB”*. None of these policies have been addressed in the submission and further information is requested from the applicant on these matters.

Recommendation

Therefore, the Board requests that the applicant is asked to provide further information to address the Board's concerns outlined above and to demonstrate that the proposal shall conserve and enhance the natural beauty of the AONB. 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) 17 Pastoral Lowland Vale;
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)) particularly, in this instance, with regards to LCT 17 ([link](#)), including Section 17.2;
- Cotswolds AONB Local Distinctiveness and Landscape Change ([link](#));
- Cotswolds Conservation Board Position Statements ([link](#)) particularly, in this instance, with regards to Tranquillity Position Statement ([link](#)).

The applicant should provide further assessment of the proposal in terms of its highways, landscape and visual, ecological (including biodiversity net gain) and arboricultural impacts.

The Board will be happy to provide a definitive opinion on likely effects once this information has been submitted by the applicant.

Please do not hesitate to contact me if you require any further information or 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

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

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