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Gloucestershire
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By email only to: James.Lloyd@tewkesbury.gov.uk & developmentapplications@tewkesbury.gov.uk

1 February 2021

Dear James

APPLICATION NO: 20/00943/FUL

DESCRIPTION: Change of use from agricultural to private equestrian and erection of stables and associated hardstanding

LOCATION: Land to the Rear of Orchard Road, Alderton, Tewkesbury, Gloucestershire

I am writing to inform you that planning application 20/00943/FUL, which would be located within the Cotswolds National Landscape, has been brought to the attention of the Cotswolds Conservation Board ('the Board'). Having reviewed the planning application, we would like to make the following comments.

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) 19 (Unwooded Vale), in which the proposed development is located, and LCT 1 (Escarpment Outliers), from which the proposed development could potentially be viewed;
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)), particularly, in this instance, with regards to LCT 19 ([link](#)), including Section 19.6, and LCT 1 ([link](#));
- Cotswolds AONB Local Distinctiveness and Landscape Change ([link](#));
- Cotswolds Conservation Board Position Statements ([link](#)), particularly, in this instance, the Position Statement on the Keeping of Horses and Ponies ([link](#)) and the related guidance note of the same name ([link](#)).

Whilst we recognise that stables are common feature of the Cotswolds National Landscape, we do have a number of concerns about the proposed development, as outlined below. For these reasons, we object to the proposed development and recommend that planning permission should be refused.

The proposed development does not comply with the Board's position statement and guidance on the keeping of horses and ponies on several grounds. For example:

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



- The proposed structure is not designed in a way that minimises its impact on the landscape (see below for further details).
- The position statement and guidance state that a minimum area of 1 hectare per full sized horse is highly desirable. However, the field where the stable would be located is only approximately 0.5 hectares. Not only would this be inadequate for the horse, it is also likely to result in the degradation of the field, for example, as a result of trampling or poaching. This, in turn, could adversely affect the landscape character and species-diversity of the site.
- The site does not provide direct access to the bridleway network, with the nearest bridleway being approximately 560m away.

With regards to the first of these three bullet points, we are particularly concerned at the scale of the proposed structure. Its 'footprint' of 86m² is larger than the footprint of many of the individual houses on Orchard Road. This footprint also seems to be considerably larger than that required for a single stable, and associated tack room and feed / equipment store. For example, various websites indicate that the area required for a stable for one horse is approximately 13m² (or 15.5m² for a large horse). The same information indicates that a tack room or feed / equipment store for one horse can each be approximately half this size. On this basis, the total area required only needs to be approximately 26m² (or 31m² for a large horse). As such, the footprint of 86m² would appear to be approximately three times larger than the footprint required for the purpose specified.

Similarly, the height of the proposed structure (a ridge height of approximately 4.5-5m) also appears to be excessive, given that the ridge height for a stable only needs to be approximately 3m.

This excessive size is particularly concerning in the context of the location of the proposed stable, at the foot of Alderton Hill. Alderton Hill forms part of Landscape Character Type (LCT) 1 (Escarpment Outliers), referred to above. One of the key features of LCT 1 is the dramatic panoramic views from the upper slopes of the escarpment outliers, such as Alderton Hill. The excessive size of the proposed structure means that it is likely to have a more significant impact on views from public rights of way on Alderton Hill than would be necessary for a single stable.

If you have any queries regarding these comments please don't hesitate to get in touch.

Yours sincerely,



Planning & Landscape Lead



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. ([Link](#)).