

From: Kate Biggs
Sent: Tuesday, June 21, 2022 12:16 PM
To: Joann Meneaud
Subject: Hill Farm, Hempsted appeal consultation response

Dear Jo,

Regarding the appeal for Hill Farm, Hempsted, I make the following observations. Formal comments were made by the Conservation Officer on the original application. These still stand.

It is noted that the new documentation indicates that the numbers will drop to 215, this is to be welcomed.

It is also noted that the site is no longer a designated Landscape Conservation Area. The impact on the Hempstead Conservation Area is at the lower end of less than substantial harm, but this may be outweighed by the public benefits. The harm to the rural character of the Conservation Area may be mitigated by landscape proposals that soften the transition between the built form of the Conservation Area and the adjoining rural landscape with a focus on planting appropriate native species and connectivity to the west to reduce the visual impact on the setting of the Hempsted Conservation Area.

Kind regards
Kate Biggs

Gloucester City Council

Application Consultation Memorandum

To: Development Management **Planning Officer:** Joann Meneaud

From: Charlotte Bowles-Lewis, Principal Conservation Officer

Date: 03.6.20 **Planning Reference:** 20/00315/OUT

Location: Land at Hill Farm Hempsted Lane Gloucester

Proposed: Outline application for the erection of up to 245 dwellings with public open space, structural planting and landscaping, surface water flood mitigation and attenuation and vehicular access point from Hempsted Lane. All matters reserved except for means of vehicular access.

Dear Joann,

Legislation and Policy

The site is located adjacent the Hempsted Conservation Area wherein the Local Planning Authority is statutorily obliged to pay special attention to the desirability of preserving or enhancing the character or appearance of the area. This duty is required in relation to Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Section 16 of the National Planning Policy Framework asks that Local Planning Authorities should take account of the desirability of sustaining or enhancing the significance of heritage assets.

Paragraph 192 states that in determining planning applications, local planning authorities should take account of:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- the desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 193 states that when considering the impact of the proposed works on the significance of a designated heritage asset, great weight should be given to the asset's conservation. It also notes that significance can be harmed through alteration or development within the setting.

Paragraph 194 states that any harm to or loss of the significance of a heritage asset should require clear and convincing justification. Paragraph 195 states that where a proposed development will lead to substantial harm applications should be refused unless it is demonstrated that that harm is necessary to achieve substantial public benefits, whilst

Paragraph 196 states that where a development proposal will cause harm to the significance of a designated heritage asset that is less than substantial harm, that harm is weighed against the public benefits of those works.

The Pre-Submission version of the Gloucester City Plan (City Plan) was approved for publication and submission at the Council meeting held on 26 September 2019. On the basis of the stage of preparation that the plan has reached, and the consistency of its policies with the NPPF, the emerging policies of the plan can be afforded limited to moderate weight in accordance with paragraph 48 of the NPPF, subject to the extent to which there are unresolved objections to each individual policy (the less significant the unresolved objections, the greater the weight that may be given).

The adopted Joint Core Strategy has been produced in partnership between Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council, and sets out a planning framework for all three areas. Policy SD8 in the Joint Core Strategy concerns the historic environment.

Proposals and Comments

This site is located within the parish of Hempsted and the Hempsted Conservation Area is located approximately 125m to the north. The site is a rural location consisting of open fields and to the north of the site are modern residential dwellings which form part of the village fringe. The site is highly prominent with key views of the site from the A430 (Secunda Way) when approaching Hempsted and from the public right of way between Rea Lane And A430 (Secunda Way).

Hempsted is surrounded by open fields to the south, west and north east, and has several other fields on the eastern side. These fields form a protective green belt around the village and have been designated as a Landscape Conservation Area. The application seeks to provide 245 dwellings and my comments are as follows –

The adopted Conservation Area Appraisal and Management Recommendations for Hempsted were adopted in September 2007 as interim planning guidance. As part of this formal review policies have been formulated in relation to new development this is to ensure that the rural character of the conservation area is preserved. The key characteristic of the conservation area is the distinctive rural character and low-density housing, with several farmsteads and former farmhouses within its boundaries, as well as a number of agricultural fields. While it is located close to major through roads, a landfill site, flood defences and industrial estates lining the former docks and the Gloucester and Sharpness canal, Hempsted has successfully retained a separate identity and has not been affected by industrial and suburban sprawl. A key issue identified within the Conservation Area Appraisal and Management Recommendations is notably that of “Development pressures” section 1.2.2 whereby *“Fields and gardens within the village are already subject to development pressure. Such development is judged to be detrimental to the setting of the conservation area.”*

Hempsted preserves its separate identity as a village on the south-western side of the city. The fact that it has escaped being swamped by suburban sprawl is all the more remarkable given its proximity to Gloucester: the centre of Hempsted is only 2.3km from Gloucester Cross, marking the centre of the city, and yet in appearance and character Hempsted is more like the Severnside villages further south and west than it is like nearby suburbs, such as Tuffley and Quedgeley. While the site proposed for development is located beyond the conservation area boundary the application site does contribute to the rural setting of the village as identified within the Hempsted Conservation Area Appraisal and Management Recommendations.

The NPPF definition of significance is *"The value of a heritage asset to this and future generations because of its heritage interest. That interest may archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting."* Setting is defined as *"the surroundings in which a heritage asset is experienced."* Also setting does not depend on public rights of way or the ability to access it; it is the pastoral character which makes a positive contribution to the rural setting and significance of the village character.

I do have concerns regarding this proposal as such development would further compromise the remaining rural settlement of Hempsted by providing further development resulting in the loss of green fields which contribute to the character of the conservation area, being a key characteristic within the conservation area appraisal. The Appraisal states *"It has a distinctive rural character, with several farmsteads and former farmhouses within its boundaries, as well as a number of agricultural fields"* Therefore to develop agricultural fields that are an integral part of the rural character of Hempsted to provide 245 residential dwellings would be harmful to the character of the conservation area itself and lead to a denser village character.

Conclusion

Therefore, based on the above comments together with both national and local planning policy guidance this application would result in harm to the setting of the Hempstead conservation area by virtue of the loss of the rural character of the conservation area. The rural and village characteristics are integral to the character and appearance of the conservation area and help to preserve the sense of separation from Gloucester. As such the proposals to provide 245 residential dwellings would fail to preserve or enhance the character or appearance of the Hempstead Conservation Area as required in relation to Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. This harm has been identified as being of less-than substantial and would need to be weighed against any resultant public benefits. Section 16 of the NPPF states that proposals should sustain or enhance the significance of heritage assets which includes the architectural and historic interest and setting of designated heritage assets and the character and appearance of designated Conservation Area. Paragraph 194 states that any harm to or loss of the significance of a heritage asset should require clear and convincing justification. It is assessed that the harm of the proposal is that of less-than-substantial harm.

Paragraph 196 states that where a development proposal will cause harm to the significance of a designated heritage asset that is less-than-substantial-harm, that harm is weighed against the public benefits of those works.

The proposal is also contrary to Policies SD8 of the JCS whereby the development fails to have regard to valued and distinctive elements of the historic environment. The policy goes on to state that *"Designated and undesignated heritage assets, and their settings, will be conserved and enhanced as appropriate to their significance and for their important contribution to local character, distinctiveness and sense of place"*

Regards,
Charlotte
Charlotte Bowles-Lewis IHBC
Principal Conservation Officer