

Item No 02:-

20/02709/FUL

**Garage
15 Main Street
Coln St Aldwyns
Gloucestershire
GL7 5AN**

Item No 02:-

Change of use of a residential garage to a holiday let and associated external alterations at Garage 15 Main Street Coln St Aldwyns Gloucestershire GL7 5AN

| Full Application 20/02709/FUL | |
|--|---------------------------|
| Applicant: | Mr Ben Court |
| Agent: | Eclipse Planning Services |
| Case Officer: | Claire Baker |
| Ward Member(s): | Councillor Ray Theodoulou |
| Committee Date: | 12th May 2021 |
| RECOMMENDATION: | PERMIT |

Main Issues:

- (a) The Principle of development
- (b) Scale, design and impact on the Colne St Aldwyn Conservation Area and adjacent listed buildings
- (c) Impact on the Cotswolds Area of Outstanding Natural Beauty (AONB).
- (d) Highway impact
- (e) Impact on residential amenity
- (f) Response to Planning Officer's original report by 14 local residents

Reasons for Referral:

Councillor Theodoulou has referred the application to the Planning and Licensing Committee for the following reasons:

"Highways safety is compromised as visibility upon entering or leaving the property from the narrow road is inadequate contrary to NPPF 2020 para 109.

The provision of more tourist accommodation will have an adverse impact on the local environment and the daily life of local residents contrary to the Local Plan.

Adverse impact on the Conservation Area.

Loss of the privacy of neighbouring Swan Cottage."

I. Site Description:

The application site is located within the non-principal settlement of Coln St Aldwyns. The site comprises a 1.5 storey double residential garage fronting and accessed from Main Street. It is built of Cotswold stone and slates, with a pair of vertically boarded timber doors. Two rooflights are located in the eastern (rear) roof slope. The building is set back from the highway and there are two off-road parking spaces in front of each garage door. Adjoining the site to the south is 16 Main Street and a terrace of eight dwellings, 8-14 Main

Street. The terrace is Grade II listed and located at the back of the footway. The garden of No. 16 abuts the site to the south. To the north is the access drive serving Chance House to the north east of the Site. To the west, beyond Main Street are gardens and a paddock. The site also lies within the Colne St Aldwyn Conservation Area and the Cotswolds Area of Outstanding Natural Beauty.

2. Relevant Planning History:

CD.2397/C The erection of a new garage between Chance House and Roasmundi. Permitted 13 February 1991.

20/01490/FUL Change of use of residential garage (C3) to Osteopath Practice (D1). External alterations including installation of glazed doors, rooflights, 2 dormers to front elevation and gable end casement windows. Withdrawn 19 June 2020.

3. Planning Policies:

EN1 Built, Natural & Historic Environment
EN2 Design of Built & Natural Environment
EN4 The Wider Natural & Historic Landscape
EN5 Cotswolds AONB
EN10 HE: Designated Heritage Assets
EN11 HE: DHA - Conservation Areas
EN14 Managing Flood Risk
INF4 Highway Safety
INF5 Parking Provision

4. Observations of Consultees:

Drainage Engineer: No objection
Highway Officer: No objection subject to condition

5. View of Town/Parish Council:

Coln St Aldwyns Parish Council objects: If this garage become a holiday cottage, the guests will only have the front of their cars for a view from the ground floor; there is no room for an area to sit outside in apart from the parking/turning area; the original planning permission is only for a double garage, which is needed to alleviate the lack of car parking space on Main Street, not add to it; guests' cars once parked will be reversed onto Main Street where there is no field of vision of oncoming traffic; the turning area, which is a main component of the original permission will be lost; the installation of both of the windows would cause a significant loss of privacy to Swan Cottage.

6. Other Representations:

30 objections received to proposal as originally submitted:

(i)The Main Street of Coln St Aldwyns suffers from a distinct lack of parking in an area of high demand therefore the proposal would create further traffic and parking problems;

- (ii) the proposed development would severely impinge upon the visual and aural privacy of the adjacent property, Swan Cottage at 16 Main Street;
- (iii) the two planned windows in the southerly gable wall of the garage would provide a line of sight at a distance of less than 9 metres into the ground floor sitting room and kitchen, and first floor bathroom and there would be noise pollution from a holiday let through a glass at a distance of no more than 1 metre from the enclosed private garden;
- (iv) the large single-pane, industrial casement window design at the ground floor is entirely inappropriate for a listed building environment;
- (v) the overall design is inappropriate for a conservation area and area of outstanding natural beauty; the permission was given for a garage in perpetuity;
- (vi) overdevelopment of the site;
- (vii) loss of parking on a street where there are already severe parking issues;
- (viii) occupants of the holiday let would be likely to use the parking spaces of 16 Main Street;
- (ix) the building could be converted to commercial premises in the future;
- (x) it would lead to additional vehicles and increased highway danger on an already congested road;
- (xi) the installation of dormers to the front elevation would be in breach of existing design approach by the Council and also to the setting of neighbouring listed properties;
- (xii) the original planning consent for the garages stipulated that there should be a turning area in front for not only the safety of vehicles but pedestrians and other road/pavement users;
- (xiii) no amenity space for occupants;
- (xiv) already have more than enough holiday lets/AirBNBs in our village and any more would further erode our important community spirit;
- (xv) there are several residents who would be willing to acquire the garages for their approved parking use and if they were retained for that purpose;
- (xvi) there are major difficulties with access and egress to and from the existing garage forecourt and for this reason the original planning permission (90/01359/FUL) required the area in front of the garages to be kept clear for the turning of vehicles, and this provision should be retained;
- (xvii) the design of the conversion breaches design principles insisted upon by the Council on houses and cottages in the row;
- (xviii) the garage would look like a very strange small house quite out of context with the adjoining listed buildings and in a very prominent position;
- (xix) there is no a suitable place for bin storage at the property;
- (xx) Main Street backs onto a seasonally flooded meadow and meadows are a priority habitat;
- (xxi) use of the front area for amenity may cause noise and disturbance;
- (xxii) this will set a precedent for the conversion of other garages;
- (xxiii) the Highway Authority has reversed its position in relation to this application in a remarkable U-turn;
- (xxiv) the Highway Officer has not given consideration to the restrictive conditions attached to the original permission for the garage; and has not addressed serious concerns over highway safety;
- (xxv) no consideration has been given to whether the application complies with Local Plan Policy INF3 and INF4 or paras 108-111 of the NPPF;
- (xxvi) the Highway Authority is wrong to conclude that there has been "severance from the adjoining dwelling" as planning permission runs with the land and in this case, planning permission limits the use of the land;

(xxvii) it is to be used as a garage "only for purposes incidental to the use and enjoyment of [Number 15 " therefore, unless and until there is a successful planning application to remove or vary the conditions, the garages and the dwelling at Number 15 are still joined at the hip;

(xxviii) there hasn't been severance in a relevant planning sense; the garages cannot lawfully be used for any other purpose;

(xxix) the condition that the Highway Authority has proposed (namely that an area be provided for the purpose of parking a vehicle) would be difficult to enforce and cuts across existing planning conditions;

(xxx) there has been no consideration of whether or not there has been a material change of circumstances to justify varying or removing the existing planning conditions and given the substantial increase in traffic and congestion on Main Street, the considerations which led the planning authorities (rightly) to impose these conditions in 1991 apply with greater force today;

(xxxi) the local bus service runs only once/day and therefore the proposed development would not provide adequate access to public transport for visitors staying in the holiday let, nor does it provide any cycle storage or plug-in facilities for low-emission vehicles;

(xxxii) the site is not in a sustainable location;

(xxxiii) the internal layout, with steep and narrow stairs, would make access to the upper floor difficult and hazardous for some people with disabilities and the site and the existing building is not considered appropriate or sufficient to provide satisfactory holiday accommodation.

6 letters of objection received following the amended proposal raising the following new issues:

- (i) The proposal does not comply with Section D67 I. P of the CDC's own Design Code which requires an interface distance of 22m for facing windows;
- (ii) the revised scheme to alter the window and door arrangement is not sympathetic to the village street scene in this area adjacent to the listed 1700s terraced cottages;
- (iii) the change to large panel glass windows and boarded panels is not sympathetic to the adjacent properties;
- (ix) the new front elevation is now entirely inappropriate to the street scene in Main St; revised design totally out of character with the Cotswold stone and casement windows which are found on every house in the street;
- (x) the Council's Cotswold Design Code indicates that the traditional materials which form the Cotswold Vernacular are limestone walling and casement windows and the revised scheme is completely at odds with this contrary to Local Policy EN2 of the Local Plan;
- (xi) no adequate evaluation of this revised design in the Officer report in terms of the Design Code and the revised proposal fails to preserve or enhance the character or appearance of the Conservation Area or the setting contrary to Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, Policies EN10, EN11 of the Local Plan, and Sections 12 and 16 of the National Planning Policy Framework;
- (xii) despite nearly 70 objections this application is not going to Committee which is extremely unusual and one has to ask if the Planning Officer or department has been influenced in some way to bypass usual practices and if this does not go to Committee objectors will have to take the necessary steps to have this entire process investigated by the appropriate authorities;
- (xiii) third parties were not formally consulted on the design change which is significant;
- (xiv) the Highway Officer's about turn is suspicious;

- (xv) no provision for opaque and fixed shut windows in Policy EN2 and it would be difficult to monitor and enforce;
- (xvi) particular concerns have been raised by the owners of 15 Main Street regarding the safety of their 3 small children;
- (xvii) there is no analysis in the Officer report as to why the proposal is 'appropriately located within the development boundary' as required by Policy EC11 and no reference has been made to paragraph 3.09 of the Local Plan which states that tourism if not properly managed could have adverse impacts on the District's environment and the daily life of local people.

A statement in response to the original Officer report from 14 third parties and an addendum has also been received and is attached to this report.

1 Letter of support received.

Local plan policy supports the conversion of existing buildings to self-catering holiday accommodation and it also supports tourism; the proposed development would not impact on parking capacity in Main Street as there would be two off road parking spaces and any off street parking associated with an existing dwelling was lost when the garage was sold in 2020.

8. Officer's Assessment:

The Proposal

This application seeks planning permission for the conversion of a residential garage to a two bedroom holiday let. Some external alterations are proposed to facilitate this use including the replacement of garage doors with boarding/windows and a single door. In the rear roof slope two smaller rooflights would replace the existing and would serve the stairwell and first floor bedroom. A further two small rooflights are proposed to serve the ground floor. In the south elevation two windows are proposed to serve the bathroom and living area respectively. Both would have cill heights of 1.7m and be obscurely glazed and fixed shut. There would be no increase in the footprint of the building. Access would continue to be from Main Street and on-site parking for two vehicles would be retained to the front of the building.

(a) The Principle of Development

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that 'If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.' The starting point for the consideration of this proposal is therefore the current development plan for the District which is the Cotswold District Local Plan 2011-2031.

The application site is located within the non-principal settlement of Coln St Aldwyns. The proposal is for a dwelling; albeit for holiday accommodation and therefore Local Plan Policy

DS3 (Small-Scale Residential Development in Non-Principal Settlements) is relevant and states that:

"1. In Non-Principal Settlements, small-scale residential development will be permitted provided it:

- a. demonstrably supports or enhances the vitality of the local community and the continued availability of services and facilities locally;
- b. is of a proportionate scale and maintains and enhances sustainable patterns of development;
- c. complements the form and character of the settlement; and
- d. does not have an adverse cumulative impact on the settlement having regard to other developments permitted during the Local Plan period."

However, the proposal is specifically for self-catering holiday accommodation and as such is also subject to Local Plan Policy EC11 (Tourist Accommodation). Policy EC11 states:

- "3. Proposals for self-catering holiday accommodation will only be permitted where it:
- a. is provided through the conservation and conversion of existing buildings, including agricultural buildings; or
 - b. is appropriately located within Development Boundaries.
4. Exceptionally, proposals for new-build, short, stay, self-catering units that are directly associated on-site with a tourist attraction and required to sustain the viability of the tourist attraction, will be acceptable."

Objectors have made reference to paragraph 3.09 of the Local Plan which states that tourism, if not properly managed, could have adverse impacts on the District's environment and the daily life of local people. Paragraph 3.09 is part of the introduction to the Local Plan which provides the background for the policies contained within it. Policy EC11 is intended to manage tourism, in this case, self-catering holiday accommodation, by restricting them to the conversion of existing buildings or within appropriate development boundaries. Coln St Adlwyns does not have a Development Boundary, but the proposal is for the conversion of an existing building and as such it complies with criterion 3a of Local Plan Policy EC11 and is therefore acceptable. The issue of the design of the building proposals are addressed separately within this report.

Objectors have asserted that the proposal is contrary to Local Plan Policy DS3 (Small Scale Residential Development in Non-Principal Settlements), due to its cramped and unsatisfactory accommodation and lack of amenity space. Indeed were the proposal for a permanent residential dwelling, Officers would consider it unsuitable in these respects. However, the proposal is for holiday accommodation and as such is subject to Local Plan Policy EC11 rather than Local Plan Policy DS3 and the modest accommodation and lack of amenity space is considered to be acceptable for such accommodation.

(b) Scale, design and impact on the Coln St Adlwyns Conservation Area and adjacent listed buildings

The application site lies within close proximity to, and within the wider setting of 8-14 Main Street which are grade II listed buildings. In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning

authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses, in accordance with Section 66(1) of the Planning (Listed Buildings & Conservation Areas) Act, 1990. The site also lies within the designated Colne St Aldwyns 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, in accordance with Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990.

Local Plan Policy EN2 states that development should accord with the Cotswold Design Code, and that proposals should respect the character and distinctive appearance of the locality.

Local Plan Policy EN10 reiterates the NPPF's concern that great weight should be given to the conservation of designated heritage assets. It states that proposals that sustain the character, appearance and significance of designated assets will be permitted, but that proposals that would harm the significance of an asset or its setting would not be permitted unless outweighed by mitigating public benefit.

Local Plan Policy EN11 states that proposals that affect conservation areas or their settings would be permitted providing that, amongst other things; it would preserve or where appropriate enhance the special character and appearance of the Conservation Area in terms of siting, scale, form, proportion, design, and materials; and that it will not result in a loss of open spaces, including garden areas and village greens, which make a valuable contribution to the character and/or appearance of the conservation area. It also states that internally illuminated signage will not be permitted unless it does not have an adverse impact on the Conservation Area or its setting.

Section 12 of the revised National Planning Policy Framework reiterates that achieving a high quality of design for places and buildings is fundamental to the planning process.

Paragraph 127 advises that, amongst other things, development should be: 'sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change'.

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

The application site comprises a modern 1.5 storey double residential garage. It is built of Cotswold stone and slates, with a pair of vertically boarded timber doors. The application as originally submitted proposed dormer and casement windows and a central door to the front elevation giving the appearance of a small cottage. Two windows were also proposed in the south elevation, the ground floor window being a horizontal rectangular in shape. Officers and local residents considered the proposed design of the conversion, which sought to emulate a traditional vernacular cottage, to be inappropriate given the small scale of the garage. Given its scale and lack of curtilage, it was considered more appropriate that the building retained a simple outbuilding appearance rather than a miniature cottage particularly in the context of the conservation area and the setting of nearby listed buildings. Consequently, amended plans were requested and submitted which show a revised design. The dormer windows have been deleted and the central door and casement windows have

been replaced by glazing and boarding to give the appearance of an ancillary building which is considered more appropriate given the size of the garage to be converted. The ground floor horizontal rectangular window has also been replaced with a smaller vertical window to match that proposed for the first floor. When assessing the acceptability of the design, consideration has been given to the current appearance of the garage. The revised scheme proposes modest amendments to the appearance of the existing modern garage, which would have no greater impact on the listed buildings and conservation area than the existing building. As such, officers consider that the setting of the listed buildings and the character and appearance of the conservation area would be preserved. The proposal is therefore considered to accord with Local Plan Policies EN2, EN10, EN11 and Sections 12 and 16 of the NPPF.

(c) Impact on the Cotswolds Area of Outstanding Natural Beauty (AONB)

The site is also within the Cotswolds Area of Outstanding Natural Beauty (AONB).

Local plan policy EN5 (Cotswolds Area of Outstanding Natural Beauty) states that:

"1. In determining development proposals within the AONB or its setting, the conservation and enhancement of the natural beauty of the landscape, its character and special qualities will be given great weight."

Chapter 15 (Conserving and enhancing the natural environment) of the NPPF recognises the role that planning can play on both contributing to and enhancing the natural and local environment through the protection and enhancement of valued landscapes. Paragraph 172 states that great weight should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty.

The application lies with the existing village envelope and therefore, in respect of the impact of the development on the AONB's natural beauty and landscape, the character and appearance of this part of the AONB is reasonably considered to be determined by the character and appearance of the conservation area, rather than the wider countryside landscape. It therefore follows that if the proposal is considered to be acceptable within the conservation area, it would also not detract from this part of the AONB and its natural beauty and landscape character. As stated above the revised plans are considered to be appropriate. The proposal is therefore considered to accord with Local Plan Policy EN5 and Section 15 of the NPPF.

(d) Highway Impact

Local Plan Policy INF4 (Highway Safety) requires developments to have safe and suitable accesses and be well integrated with the existing transport network.

Local Plan Policy INF5 (Parking Provision) requires that developments should accord with the parking provisions of the Local Plan parking toolkit.

Chapter 9 (Promoting sustainable transport) of the NPPF at paragraph 109 states that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Planning permission (CD.2397/C) was originally granted for the garage that is the subject of this application in 1991. Many objections have been received stating that the garage should only be used in association with 15 Main Street and that the following conditions, attached to that permission should still be adhered to:-

Condition 4 states:

"The development should not be brought into use until the turning area shown on the permitted drawings has been permanently implemented. The turning area shall be kept clear at all times.

Reason: To ensure that vehicles can enter and leave the site safely and to ensure that the turning area is always available for that purpose."

Condition 5 states:

"The proposed garage shall only be used for purposes incidental to the use and enjoyment of the dwelling house as such and no trade or business shall be carried on therein.

Reason: To safeguard the amenities of the area."

It should be noted that the decision notice does not specify which dwelling house the condition refers to. It should also be noted that the reason given for Condition 5 is the impact on amenity, not on highway safety.

The current application is for the conversion of the garage to holiday accommodation and the highway impact of the proposal is a material consideration. When originally consulted, the Highway Authority raised an objection to the proposal on the grounds that the proposal would remove a garage, which can house two vehicles and the associated hardstanding that allows for another two vehicles, and that therefore there would be a potential loss of 2 garage spaces and 2 hardstanding spaces, equalling a possible 4 off street parking spaces. In addition the plans did not show how the existing hardstanding would be laid out and what it would accommodate. As a result, the applicant's agent submitted an amended plan which showed the provision of two parking spaces on the hardstanding. Whilst this was welcomed, the Highway Officer maintained his objection due to the loss of parking within the garage and the fact that the occupants of the holiday accommodation would be likely to use the hardstanding as an outdoor amenity area.

The applicant's agent challenged the Highway Officer's objection and as a result a Senior Highway Officer re-considered the response. The Senior Highway Officer stated that clarification made it clear that there is severance from the adjoining dwelling, and as such any displacement issues could only be considered should they be arising from the current application. He stated that the proposal is a single holiday let unit, and that comparison needs to be drawn to what parking demands would exist should the proposal be for a dwelling house. The application site plan shows that 2 spaces can be accommodated, whereas only 1 external parking space is required, having regard to existing parking standards for a dwelling of this size. Comments have been made that, due to limited external space, the parking area may be used as a social space. However, it is reasonable to seek a planning condition to ensure that 1 parking space is retained solely for that purpose.

This is to ensure that the holiday let does not result in displacement of parking onto the street.

It is also relevant that the Highway Authority did not raise any objection to application 20/01490/FUL for a Change of use of residential garage (C3) to Osteopath Practice (D1), which could be expected to generate a higher parking requirement. The Highway Officer confirms that the Highway Authority has undertaken a robust assessment of the planning application and that based on the analysis of the information submitted the Highway Authority concludes that there would not be an unacceptable impact on Highway Safety or a severe impact on congestion. He therefore finds no justifiable grounds on which an objection could be maintained. The proposal is therefore considered to comply with Local Plan Policies INF4, INF5 and Chapter 9 of the NPPF.

(e) Impact on Residential Amenity

Local Plan Policy EN2, Paragraph D.67 1 (p) states that to ensure adequate privacy, the minimum distance between facing windows of one and two storey dwellings there should be a minimum distance of 22m between facing windows of one and two storey dwellings. It then goes on to define facing windows as those which can be readily seen into from within the principal rooms in another property.

Chapter 12 (Achieving well designed places) of the NPPF stresses the importance of a high standard of amenity for existing and future users.

Objections have been received on the grounds of loss of privacy due to the overlooking of the ground floor sitting room and kitchen of the adjacent property, Swan Cottage, 16 Main Street, from the two proposed windows in the southern elevation. As the interface distance would be approximately 8 metres between facing windows, it is proposed that the windows on the side elevation would be opaque and fixed shut. Whilst this is annotated on the drawing, a condition is also recommended for the avoidance of doubt and to ensure permanent mitigation.

Objections have also been raised on the grounds that, due to the lack of amenity space, the front forecourt could be used as a sitting out area. As this could be in very close proximity to the windows of the neighbouring property, if this took place, it could have a detrimental impact on the amenity of the owners of that property in terms of noise and disturbance. In order to address this, a condition has been applied to prevent the use of the forecourt as a sitting out area.

Third parties have asserted that the Officer's conclusion that there would be no detrimental impact on residential amenity is irreconcilable with Condition 5 of permission CD.2397/C, which states that the garage shall only be used as a residential garage for reasons of residential amenity. The condition was attached to prevent any other use which could impact on amenity without further consideration by the Local Planning Authority. The current application for a change of use to holiday accommodation enables the Local Planning Authority to assess whether there would be an unacceptable impact on residential amenity in terms of noise or disturbance as a result of the proposal.

Subject to the above condition/s and it has been concluded that there would be no adverse residential impact from the proposed use.

As a result, Officers are of the view that the proposals comply with Local Plan Policy EN2 and Chapter 12 of the NPPF with regard to residential amenity.

(f) Response to Planning Officers original report by 14 local residents.

A response to the Planning Officer's original report to the Ward Member has been submitted on behalf of 14 local residents. The response states that there have been irregularities in the decision making process and the Planning Officer should address the matters raised and review the recommendation and that the application should be referred to the Planning Committee. Many of the comments made have been reported in the third party objections and have been addressed in other sections of this report. The remaining comments are addressed below:

Inconsistency in decision making

Third parties have asserted that there is an inconsistency in decision making as the recommendation to permit this application is at odds with the recommendations made in connection with permission CD.2397/C for the erection of a new garage. This application, as described above, incorporated conditions. The objectors state that Local Planning Authorities can only depart from previous decisions if (a) there is a material change of circumstances and (b) they give cogent reasons for doing so. However, the current application is not for the same development as the previous permission and it should be noted that there has been a material change in circumstances since the 1991 permission in terms of policy, as the National Planning Framework has been introduced and the Cotswold District Local Plan 2011 - 2031 has been adopted. In addition, the highway guidance, Manual for Gloucestershire Streets, has been published.

The objectors also refer to the Planning Officer's previous 'decision' to refuse the current application. The Planning Officer made no formal decision regarding this application but considered that, in the light of the objection from the Highway Officer at that time, the recommendation would be to refuse. However, the revised highway response, from the specialist statutory consultee, removing the objection, was a material consideration that led the Planning Officer to reconsider the recommendation, and informed the current recommendation.

Highway Impact

The Highway Officer has responded to the comments contained in the response to the Planning Officer's original report as follows:

"The historic planning condition is not relevant to this proposal in the view of the Highway Authority. The current policy does not require a turning facility on this road based on the published guidance in "Manual for Gloucestershire Streets". This is not a road which is considered to have high levels of traffic; therefore the position is that the application would be acceptable in officer opinion without any turning facilities. A review of accident data does not show any evidence to suggest there is a particular safety concern in this area. Should an application be submitted today for an access in this location it would not need to provide a turning facility based on published guidance, therefore any attempt to retain one would be likely to fail under challenge.

A site inspection was not required for this particular proposal give the anticipated low level of trip forecast compared to the historic use associated with a dwelling house. The previous condition is not considered to be relevant to the proposal in highway terms for the reasons stated above. The Highway Authority has considered the impact of this proposal on its own merits, and considers that the number of movements at the access would be reduced by this proposal compared to historic patterns. This is the case whether the garage was used or not by the former owners. There are not considered to be any additional dangers to other road users considering the established use of the access, the low trip generation and the absence of highway safety data to suggest that there is not an accident trend.

The representation has not correctly interpreted how Manual for Streets / Manual for Streets 2 is applied. Regardless of their interpretation, this is an established access previously associated with a residential use, the proposed use would generate few trips and these are likely to be at off peak times. Again the lack of accident data is a consideration in the application of the splay line.

The Highway Authority can only consider the application before it; that is to say what is within the red line of the application. Given the adjoining dwelling is not in the application site or within any blue line (land within the applicant's control), the matter of potential displacement is not something that can considered as material to this application."

CIL

The proposed development set out in this application is liable for a charge under the Community Infrastructure Levy (CIL) Regulations 2010 (as amended)

9. Conclusion

Overall it is considered that the proposed development accords with National Planning Policy and guidance. The application site is located within a village, a non-principal settlement, and utilizes an existing building. The proposal would involve minimal changes to the appearance of the existing garage and it is therefore considered that its appearance would not detract from the character and appearance of the conservation area, the AONB, or the setting of nearby listed buildings. Officers also consider that, subject to the recommended conditions, there would be no adverse impact on residential amenity or highway safety for the reasons given above. It is therefore recommended that the application be permitted.

10. Proposed conditions:

1. The development shall be started by 3 years from the date of this decision notice.

Reason: To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2. The development hereby approved shall be carried out in accordance with the following drawing number(s): 095_03 REV G, 095_01 REV C.

Reason: For purposes of clarity and for the avoidance of doubt, in accordance with the National Planning Policy Framework.

3. Notwithstanding Classes C2 and C3 of the Schedule of the Town and Country Planning (Use Classes) Order 1987 or any other change of use permitted by any subsequent Order, the units shall be occupied as holiday accommodation only and for the avoidance of doubt they shall not be occupied as permanent, unrestricted accommodation, second homes or a principal or primary place of residence.

Reason: This is development which is only permitted at this location because it provides holiday accommodation. This needs to be carefully controlled.

4. Prior to the first occupation of the development hereby approved the windows in the southern elevation shall be fitted with obscure glazing (and shall be non-opening) and shall be permanently retained as such thereafter.

Reason: To protect the privacy of the occupants of the neighbouring dwelling in accordance with Cotswold District Local Plan Policy EN2.

5. All windows/doors shall be of timber construction and shall be permanently retained as such thereafter.

Reason: To ensure the development is completed in a manner sympathetic to the site and its surroundings in accordance with Cotswold District Local Plan Policies EN2 and EN11.

6. Prior to the first occupation of the development hereby permitted, the windows/door and boarding shall be finished in a colour to be first submitted to and approved in writing by the Local Planning Authority and shall thereafter be permanently retained in the approved colour unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure the development is completed in a manner sympathetic to the site and its surroundings in accordance with Cotswold District Local Plan Policies EN2 and EN11.

7. The development hereby permitted shall ensure an area of dimension 3.3m x 4.8m is provided for the purposes of parking a vehicle. This area shall be clearly marked and only used for the purpose of parking a vehicle in connection with the development.

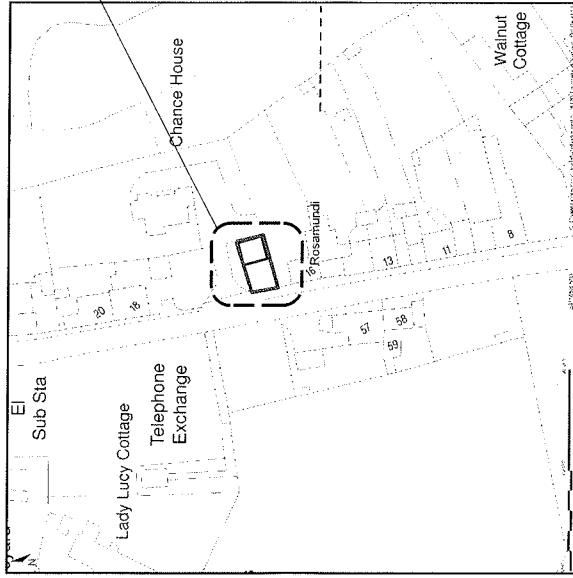
Reason: To protect highway safety and maintain the free flow of traffic in accordance with Local Plan Policies INF4 and INF5.

8. The forecourt to the front of the holiday let, hereby approved, shall only be used as a parking area and for the siting of refuse and recycling bins and for no other purpose.

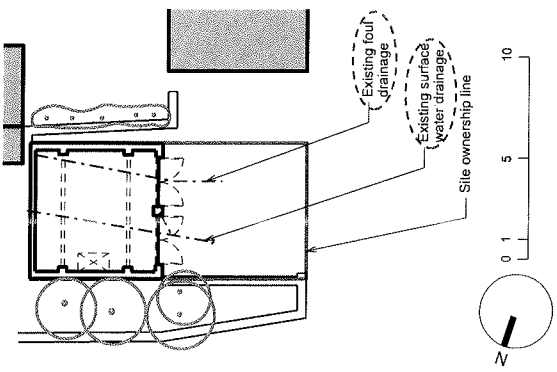
Reason: The use of the forecourt as an outdoor amenity area may give rise to noise and disturbance that would adversely impact on the residential amenity of the occupants of the neighbouring dwelling in accordance with Cotswold District Local Plan Policy EN2.

Informatives:

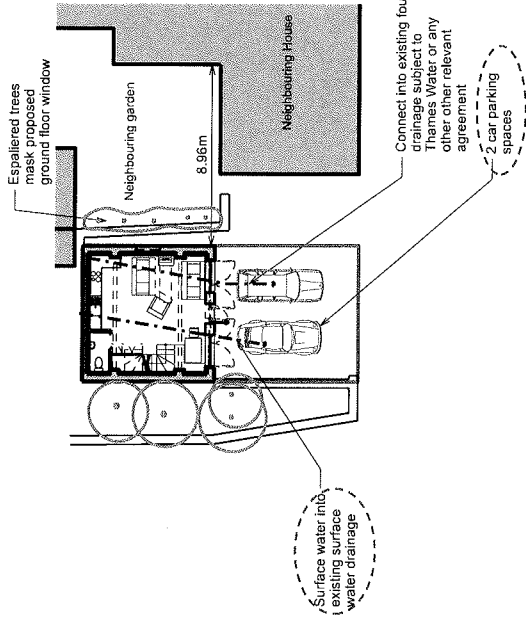
Please note that the proposed development set out in this application is liable for a charge under the Community Infrastructure Levy (CIL) Regulations 2010 (as amended). A CIL Liability Notice will be sent to the applicant, and any other person who has an interest in the land, under separate cover. The Liability Notice will contain details of the chargeable amount and how to claim exemption or relief, if appropriate. There are further details on this process on the Council's website at www.cotswold.gov.uk/CIL.



| | |
|--------|--------------------|
| 095_01 | Site Location Plan |
| A | 1:1250@A3 |



| | |
|--------|---------------------|
| 095_01 | Existing Block Plan |
| B | 1:250@A3 |



| | |
|--------|---------------------|
| 095_01 | Proposed Block Plan |
| C | 1:250@A3 |

Existing
Demolition
Proposed
Above

This drawing is prepared as part of an options study and is not for construction. All layouts are shown as concepts. Engineer input required, statutory approvals required and detailed design has not been undertaken.

Undertake asbestos survey in areas to be adjusted

Revisions

| Revision | Date | Description |
|----------|------------|---|
| A | 25.02.2020 | FOR PLANNING |
| B | 27.03.2020 | Garage, surface water drainage, foul drain, etc etc |
| C | 27.03.2020 | Surface water from aerial |

Rural Workshop Ltd
Architects

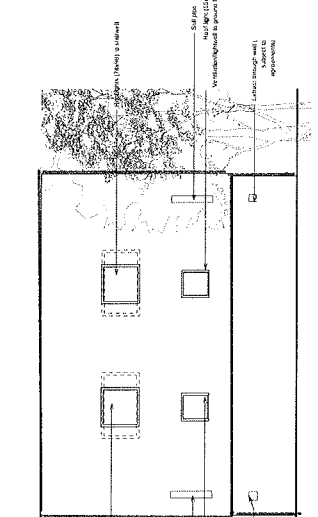
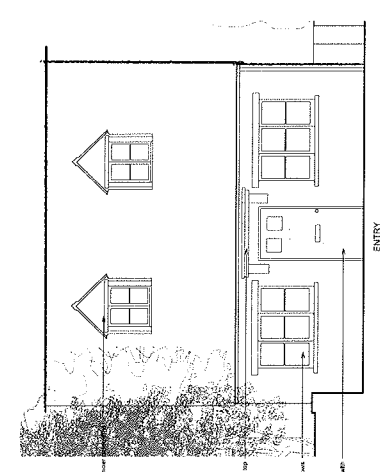
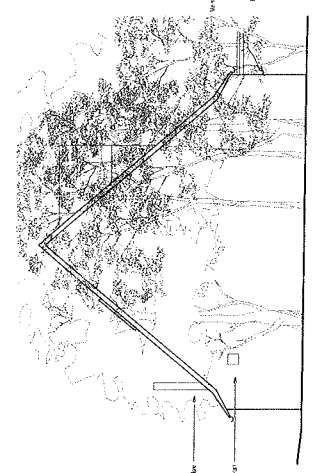
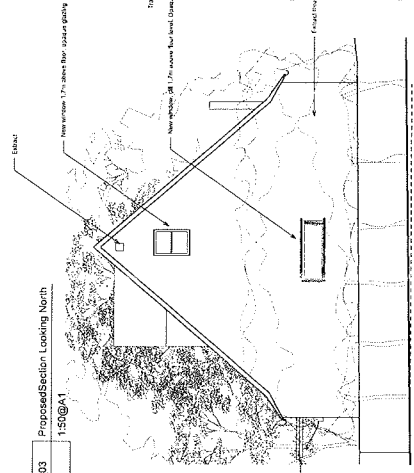
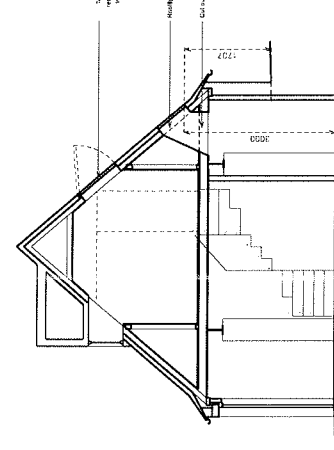
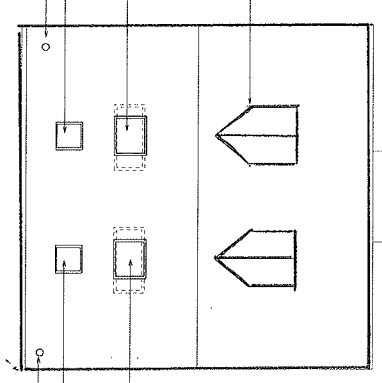
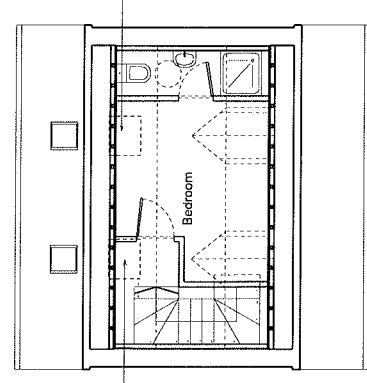
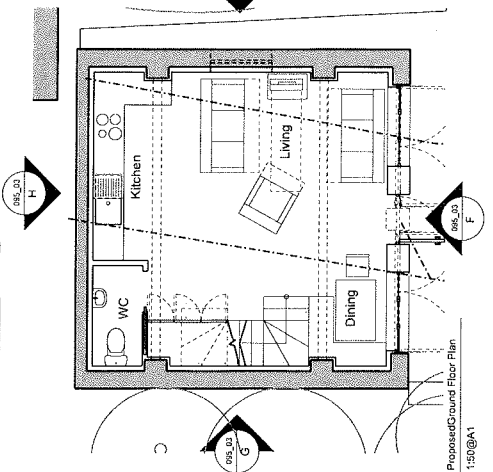
19-19, The Old Mill, Coln St Aldwyns, Gloucestershire, GL50 2JF
01453 715576
www.ruralworkshop.co.uk

Project
The Garage
Coln St Aldwyns

| | |
|------------------|----------|
| Drawing Title | |
| Site Information | |
| Drawing Number | Revision |
| 095_01 | C |
| Scale | |
| 1:250@A3 | |
| Issue Date | |
| 30.04.2020 | |
| Status | |
| Planning | |

PROPOSED SITE PLAN

0m 1m 0.5m



- Existing
- Demolition
- Proposed
- Above

This drawing is for a preliminary study and is **NOT FOR CONSTRUCTION**. It is intended to provide a general impression of the proposed design. It is not intended to be used for construction purposes. It is not intended to be used for any other purpose. It is not intended to be used for any other purpose. It is not intended to be used for any other purpose.

Unstable asbestos survey in areas to be utilised
NOT FOR CONSTRUCTION
Preliminary Design and Principle Contractor must be appointed under Construction Design and Management (CDM) 2015.
This drawing does not highlight CDM issues

| REV | DATE | DESCRIPTION | BY | CHK |
|-----|----------|---------------------------|----|-----|
| A | 14.04.20 | Revised following meeting | TF | |
| B | 30.04.20 | Planning | TF | |
| C | 27.07.20 | Revised | TF | |
| D | 27.07.20 | Canopy | TF | |
| E | 29.07.20 | Rooflights | TF | |
| F | 05.08.20 | Amendment | TF | |

Project: **Chas St Marys**

Drawing Title: **Proposed Drawings**

Date: **08.04.2020**

Scale: **1:50 (A1), 1:100 (A3)**

Status: **Planning**

Drawn by: **[Name]**

Checked by: **[Name]**

Company: **Rural Workshop Ltd**

Quality Number: **095_03**

Revision: **F**

Rural Workshop Ltd
ARB Registered Architects
01453 715276
www.ruralworkshop.net

ORIGINAL PROPOSAL

DECISION NOTICE

THE APPLICATION

Agent:
Plans Plus Ltd,
2 Strouds Hill,
Chiseldon,
Swindon,
Wiltshire.

Applicant:
Mr. D. Trudgill,
Rosamundi,
High Street,
Coln St. Aldwyns.

APPLICATION FOR FULL PLANNING PERMISSION FOR THE ERECTION OF A NEW GARAGE AT BETWEEN CHANCE HOUSE AND ROSAMUNDI, HIGH STREET, COLN ST. ALDWYNS.

APPLICATION REFERENCE NUMBER: CD.2397/C

The application was dated 20/11/1990

THE DECISION

Date of decision: 13 Feb 1991

In pursuance of their powers under the above Act, the Council

PERMITS

the above development in accordance with the details given on the application form and submitted plans. Permission is given subject to the following **CONDITIONS**:

1. The development shall be started by 13 Feb 1996.
Reason: To comply with the requirements of Section 91 of the Town and Country Planning Act 1990.
2. The development shall not start until samples of the proposed walling and roofing materials have been approved in writing by the Local Planning Authority and only the approved materials shall be used.
Reason: To ensure that the development will be constructed of materials of a type, colour and texture and quality that will be appropriate to the site and its surroundings.
3. The development shall not start before a sample timber treated with the proposed paint colour for the external woodwork has been approved in writing by the Local Planning Authority. The external woodwork shall be finished and thereafter maintained in the approved colour.
Reason: It is important to protect and maintain the character and appearance of the area in which this development is located. The colour of the finish of the external woodwork will have a significant affect on the appearance of the proposed development.
4. The development shall not be brought into use until the turning area shown on the submitted drawings has been permanently implemented. The turning area shall be kept

clear at all times.


Reason: To ensure that vehicles can enter and leave the site safely and to ensure that the turning area is always available for that purpose.

5. The proposed garage shall be used only for purposes incidental to the use and enjoyment of the dwelling house as such and no trade or business shall be carried on therein.

Reason: To safeguard the amenities of the area.

Your attention is drawn to the **NOTES** overleaf and to the following:

1. It is very important that the development is carried out exactly in accordance with the approved plans. You are advised to take care to ensure that the work is carefully supervised.

K. COOPER 
Director of Planning, on behalf of Cotswold District Council.

REPRESENTATIONS

IN RESPONSE TO THE PLANNING OFFICER'S REPORT DATED 21.3.21

GARAGES 15 MAIN STREET, 20/02709/ FUL / CHANGE OF USE

1. These representations are made by, and on behalf of, a group of 14 residents and homeowners on Main Street who are particularly affected by this planning application ("the Application").
2. As set out below, there have been irregularities in the decision-making process. The planning officer is requested to address the matters raised herein and review her recommendation of 21 March 2021 to permit the Application. Further:
 - a. for the reasons set out below, the Application should be referred to the Planning Committee; and
 - b. these representations should be put before (i) the Review Panel and (ii) the Planning Committee.

Essential Background Facts

3. The garage at 15 Main Street is subject to extant planning conditions imposed on 13 February 1991 (Application CD.2397/C). Relevantly:
 - a. condition 4 imposes a requirement for a turning area in front of the garages to be "*permanently implemented*" and "*kept clear at all times*". The condition is expressly stated to be for reasons of highway safety: "*To ensure that vehicles can enter and leave the site safely and to ensure the turning area is always available for that purpose*";
 - b. condition 5 states that the "*garage shall be used only for purposes incidental to the use and enjoyment of the dwelling house [15 Main Street] as such and no trade or business shall be carried on therein. Reason: To safeguard the amenities of the area.*"
4. On 9 April 2020, the Applicant purchased the garage at 15 Main Street (title number G446271). No application was made at, or prior to, the sale to vary or discharge those planning conditions. At around the same time, the adjoining dwelling house at 15 Main Street was sold separately to the Southey family (who now live there).
5. The garage is still bound by the original planning permission in 1991.
6. The Application was submitted on 6 August 2020. No reference was made by the Applicant or his agents to the extant planning conditions.
7. On 10 September 2020 and again on 21 January 2021 (having looked afresh at the Application) the Highway Authority recommended the Application be refused.
8. On 21 January 2021, the CDC planning officer decided to recommend that the Application be refused.
9. In a letter dated 4 February 2021, i.e. 9 working days later, the Highway Authority reversed its decision. It provided no, or no proper, explanation for this reversal. Significantly, no reference was made to the extant planning conditions. As set out below, it now appears that the Highway Authority was unaware of those conditions. In her report dated 17 March 2021, the planning officer has now also changed her position: she now recommends that the Application be allowed. She evidently considers herself bound by the decision of the Highway Authority.

Inconsistency of decision-making

10. Consistency in decision making is a well-established and fundamental principle of planning law. Local authorities can only depart from previous decisions if (a) there is a material change of circumstances and (b) they give cogent reasons for doing so. The principle of consistency is not limited to the decision but extends to the reasoning underlying the decision.
11. In this case, the recommendation dated 21 March 2021 to allow the Application is starkly at odds with two previous decisions:
 - a. ***The decision of Cotswold District Council in 1991 to impose limitations on the use of the land.***

The decision to recommend planning permission is *prima facie* irreconcilable with the 1991 decision. There has been no material change of circumstances to justify varying or removing the existing planning conditions and departing from the decision in 1991. Indeed, the considerations which led the planning authorities to impose these conditions in 1991 apply with greater force today.
 - b. ***The decision of the planning officer of 21 January 2021 to recommend that the application be refused.***

There has been no material change of circumstances to justify departure from the planning officer's decision of 21 January 2021; nor any proper explanation for this reversal. The planning officer simply repeats the Highways' letter of 4 February 2021 in which the Highway Authority refers to "*further clarity*" about ownership and also the existence of a "*spare space*" which could accommodate parking associated with the holiday let. These are not new circumstances. The planning officer and the Highway Authority have been aware, at all material times, that the Applicant owned the garage. Nor was the existence of a "spare" parking space a change of circumstances. This had previously been considered by the Highways Authority and was expressly adverted to their decision of the 21 January 2021 when they (rightly) recommended that the Application be refused.
12. No attempt has been made to distinguish these previous decisions. There is no proper basis to depart from them.

Highway impact

13. The planning officer rightly acknowledges that Highway impact is a material consideration. She repeats verbatim (and, it is to be inferred, adopts) the decision of the Highway Authority contained in its letter dated 4 February 2021. However, the planning officer is not bound by it. For the reasons set out below, Highways' decision of 4 February 2021 is manifestly flawed and should form no part of the decision-making process. In particular:
 - a. *First*, as set out above, the decision of 4 February 2021 is inconsistent with previous decisions of the planning authority and of the Highway Authority itself.
 - b. *Second*, there is no consideration by the Highway Authority of the existing planning conditions. In particular, there is no consideration of condition 4. This is a remarkable omission. This condition (the requirement for a turning area to ensure vehicles enter and leave safely in a forward direction) exists for reasons of highway safety. There has been no material change of circumstances which could possibly justify departure from this condition. Indeed, given the substantial increase in traffic, cyclists and pedestrians, the risks to highway safety are greater now.

- c. *Third*, it now appears that that the representative of the Highway Authority who made the decision of 4 February 2021 was unaware of the planning conditions and did not conduct a site visit. This can reasonably be inferred from the following facts and matters:
- i. His failure to consider, or even refer to, the extant conditions (notwithstanding that condition 4 was imposed specifically to safeguard highway safety).
 - ii. The condition which he has proposed (namely that an area be provided for the purpose of parking a vehicle) cuts across and is inconsistent with condition 4.
 - iii. Requests have been made in correspondence and under the FOIA of the planning officer, CDC, the Highway Authority and Gloucestershire County Council to establish whether the Highway Authority was aware of and/or had considered the planning conditions and/or had visited the site. The Highway Authority and GCC have stated they hold no such information and that, if any such information existed, it would be held by Cotswold District Council (response 24 March 2021). CDC have provided information in response to FOIA requests but there is nothing in it to suggest that the Highway Authority was aware of and/or had considered the planning conditions and/or had visited the site. When pressed on the point, CDC stated, *“The Council has already provided you with all correspondence we hold between the Cotswold District Council case officer, the agent and Gloucestershire County Council and has nothing further it can add to this”* (response dated 31 March 2021).
- d. *Fourth*, the Highway Authority (and, it follows, the planning officer) considers the issue of ‘displacement’ only, i.e. displacement of parking onto Main Street. It fails to consider other relevant factors. No consideration has been given to the dangers for road users, cyclists and pedestrians arising from reversing onto or out of the site given the narrow street and the poor sight lines in both directions. Many of the objections to the Application (including those raised by the Parish Council) refer to serious concerns over highway safety.
- e. *Fifth*, there is no consideration of the inadequacy of sight lines for vehicles exiting the site. For access onto a 30mph road, the national requirement is 2.4m x 40m in the ‘Manual for Streets’ based on the Stopping Sight Distance. This requirement is also set out in the Manual for Gloucestershire Streets. The new residential unit which would be created under this proposal would manifestly fail to achieve such standards since visibility to the north is effectively zero, and to the south it is about 5-10m. This is further reduced if cars are parked along Main Street to the south, as they almost invariably are. Thus, the Application fails to meet the requirements of national, County, and Local Plan policies. This issue of highway safety is not considered at all by the Highway Authority or the planning officer.
- f. *Sixth*, the Highway Authority adopts an argument put forward by the Applicant, namely, *“it is clear that there is severance from the adjoining dwelling, and as such any displacement issues can only be considered should they be arising from this application”*. This is illogical and contains an error of law.
- First, so-called “severance” from the adjoining dwelling does not alter the purpose of the building nor its relationship to its surroundings. It is still a double garage on Main Street (for which there is a great need in the village). If it remains a double garage, then the Applicant will have to sell it on as a garage or let it as a garage. Either way,

this will take two vehicles off the street. The displacement problems therefore arise directly from this Application.

Second, the sale of the garage does not 'sever' or otherwise invalidate the planning restraints. As a matter of planning law, planning permission runs with the land. In other words, the garages are still bound by the original planning permission in 1991. The Applicant cannot circumvent those planning restrictions by "salami slicing" ownership. This would subvert planning control and create a troubling precedent.

Impact on residential amenity

14. In her assessment of the impact on residential amenity the planning officer has fallen into error:

- a. *First*, as noted above, her conclusion is irreconcilable with the authority's previous decision in 1991. Condition 5 (i.e. that the property be used only as a garage, incidental to the use and enjoyment of the dwelling house etc) was imposed precisely because of the impact on residential amenity: "*Reason: to safeguard the amenities in the area*".
- b. *Second*, there is no consideration of whether there has been a change of circumstances. In section (f) of the report, which deals with the impact on amenity, there is no reference at all to condition 5. There has been no change of circumstances which could possibly justify departure from condition 5. For the reasons set out in many of the objections (and which are not repeated herein) the issues surrounding loss of amenity are very much more acute now than they were when the 1991 decision was made. Amongst other things, the increase in on-street parking on Main Street will exacerbate existing parking problems and may prevent residents from parking near their homes. These issues, which are relevant to loss of amenity, are not addressed in the planning report.
- c. *Third*, inadequate consideration has been given to the forceful 'loss of amenity' objections raised by the *immediate* neighbours at 15 Main Street and 16 Main Street (aka Swan Cottage). Given their very close proximity to the proposed development, their objections should be given particular weight. Two issues in particular are highlighted:
 - i. The report fails altogether to consider the nuisance and loss of privacy to the owners of 15 Main Street arising from the fact that the proposed parking and "outdoor seating" area is just 2 – 3m from their living room window. Particular concerns have also been raised by the owners of 15 Main Street about the impact on the safety of their 3 small children.
 - ii. The ground floor and first floor windows in the southern elevation of the proposed development directly overlook the living room and kitchen of Number 16. There is a distance of only 8 metres between the properties. The proposal therefore contravenes Policy EN2 and the Cotswold Design Guide which requires a minimum distance of 22m between facing windows to ensure adequate privacy. The officer proposes that the new windows be opaque and fixed shut. However, there is no provision for this type of mitigation in the Cotswold Design Guide, and in any event a condition to this effect would provide little comfort to the owners of no. 16 because it would be difficult to monitor and enforce.

The principle of development; the scale, design, and impact of the proposal

15. The analysis in the report is, with respect, inadequate and omits relevant considerations. In particular:
- a. The officer addresses the principle of development in section (a) of her report. She (rightly) cites Policy EC11 but does not analyse, or provide any reasons why, the conversion of a small garage building in such close proximity to other residential accommodation in the middle of a Conservation Area *'is appropriately located within development boundaries'* as specifically required by the policy.
 - b. No reference is made to paragraph 3.0.9 of the Local Plan, which states that *'tourism is a major and growing part of the local economy. However, if not properly managed, it could have adverse impacts on the District's environment and the daily life of local people.'* No consideration has been given to the impact which the proposal is likely to have on local people. There are already some 9 holiday lets in the village, plus the New Inn which has 15 bedrooms. The evidence before the CDC is that more holiday accommodation would further erode the sense of community and character of the village, contrary to the objective above.
 - c. The report indicates that *'officers considered the proposed design to be inappropriate due to the small scale of the garage'* in its context in the Conservation Area and setting of nearby listed buildings. The external design has been revised following these comments, but the size and internal layout of the garage has not changed and remains inappropriate.
 - d. The revised design of the front elevation features wood and large rectangular glazing panels. These are alien materials in the area and thus fail to meet the requirements of Policy EN2 and the Cotswold Design Code, which identifies the vernacular as stone walls and small casement windows.
 - e. The design, materials and location of the proposal would be intrusive in the street scene in a prominent location within the Conservation Area. It would not preserve or enhance the character of the Conservation Area, and would not comply with existing legislation, Policies EN10 and 11 of the Local Plan, or paragraph 127 of the National Planning Policy Framework (NPPF).
 - f. The limited building envelope would result in extremely poor and cramped accommodation. The drawings demonstrate an attempt to cram living, dining, sleeping and toilet facilities into a space only designed to house 2 cars, and demonstrate the inadequacies of the internal arrangements, particularly the limited headroom which exists in the first floor accommodation under the steep roof pitch. There is no provision for any outside amenity space, which GCC Highways considered to be grounds for refusal.

Robert and Neha Bailhache, 16 Main Street
Nicholas Brett and Judith Miller, 10 Main Street
Leon Harris, 12 Main Street
Anne and James Jones, 13 Main Street
Sir Kevin Leeson, 20 Main Street
Nicholas and Jacqueline Medcroft, 58 Main Street
Ray Michael and Linda Bolter, 57 Main Street
Olivia and Alastair Southey, 15 Main Street

6 April 2021

ADDENDUM TO REPRESENTATIONS SUBMITTED BY NICHOLAS MEDCROFT
6TH APRIL 2021

Application 20/02709/FUL

Change of use of garages at 15 Main St, Coln St Aldwyns to holiday let

Reasons for Refusal

1. The garage building is situated in a prominent location in the Coln St Aldwyns Conservation Area (CSACA), adjoining and in close proximity to many Grade II Listed Buildings. Because of its proximity to these designated heritage assets, its scale and unsympathetic design and its prominence in the street scene, the proposal fails to meet the test set down in Policy EC11 of the Local Plan that self-catering holiday accommodation will only be permitted where it is appropriately located within development boundaries.
2. The CSACA is characterised by housing in the Cotswold Vernacular as defined in the Cotswold Design Code (CDC) (i.e. Cotswold stone walls and small casement windows). The proposal presents a frontage of vertical timber boarding with large plain-glazed windows and door, which would be an alien element prominent in the street scene. Therefore, it would not meet the requirements of Policy EN2 of the Local Plan which requires that development should comply with the CDC and respect the character and distinctive appearance of the locality, or Policies EN10 and EN11 of the Local Plan, which indicate that development should sustain the character, appearance and significance of designated heritage assets, and should preserve or enhance the appearance of the Conservation Area. In addition, the proposals would not be sympathetic to local character and history, as required by paragraph 127 of the NPPF.
3. The proposed holiday let would result in a distance of only 9m between windows on the south elevation and the principal rooms of 16 Main St. It therefore fails to meet the requirements Paragraph D.67.1 (p) of the CDC and Policy EN2, that there should be a minimum of 22m between facing windows in residential properties to ensure adequate privacy. The CDC makes no provision for mitigation measures, and the measures proposed in this case are inadequate to protect the privacy of residents of no. 16.
4. Because of the proximity of the holiday let to adjoining properties, it would lead to significant loss of privacy and amenity to the residents of nos. 15 and 16 Main St through overlooking and intrusion, contrary to Condition 5 of the original permission which restricts the use of the building to garages only in order to protect the amenity of the area, and the design and materials proposed would be an alien feature in the street scene of the Conservation Area. The proposal therefore fails to meet the policies set down in paragraph 127 of the National Planning Policy Framework, which stresses the importance of design:
 - (a) providing a high standard of amenity for existing and future users;

(b) being sympathetic to local character and history, including the surrounding built environment.

5. The proposal would result in an over-development of this modest building, resulting in cramped and unsatisfactory accommodation, characterised by the restricted headroom at first floor level and the lack of any private amenity space, contrary to the requirements of Policy DS3 which requires, inter alia, that small-scale residential development outside principal settlements is of a proportionate scale and maintains and enhances sustainable patterns of development.
6. The proposal would remove 2 much needed off-street car parking spaces in an area where there is a substantial shortage of parking for residents, and would significantly impact on the life of nearby residents by increasing demand for on-street parking. It therefore fails to meet the requirements of the supporting guidance in Paragraph 3.0.9 of the Local Plan which recognises that, whilst tourism is a major part of the local economy, if not properly managed it could have adverse impacts on the District's environment and the daily life of local people.
7. The proposal would lead to the loss of designated turning space in front of the garage which was required for highway safety reasons by Condition 4 of the original planning permission for the garages, which requires that the space in front of the garages be kept clear at all times for highway safety reasons in order to enable vehicles to enter and leave the site in a forward direction. Because of the increased level of vehicles, cyclists and pedestrian using Main St, and the very substandard sight lines available when leaving the site, the proposed change of use would lead to greater danger to all road users, contrary to the requirements of Policy INF4 of the Local Plan which requires that development should provide safe and suitable access, and paragraph 108 of the NPPF which indicates that development should be prevented where there would be an unacceptable impact on highway safety. It also fails to meet the sight line requirements set down in the Gloucestershire Manual for Streets for access onto 30mph roads.