

29.6.2016

16/00481/OUT. Outline application for the erection of up to 35 dwellings, vehicular access from Clarendon Road and Whitmore Road, together with public open space and other associated infrastructure and engineering works. All matters reserved for future consideration except for access. Part Parcel 0010 And 0024 And All Parcel 0522 Cider Mill Lane Winchcombe Gloucestershire.

The Cotswolds Conservation Board wishes to raise an **objection** for the following reasons:

This site is outside the settlement boundary, within the AONB and paragraphs 14 (footnote 9) and paragraphs 115 and 116 of the NPPF are considered relevant. The Core Planning Principles of the NPPF (paragraph 17) also states that "Allocations of land for development should prefer land of lesser environmental value" whilst paragraph 115 confirms AONBs as having the "highest status of protection in relation to landscape and scenic beauty." Paragraph 116 includes consideration should be given to the need for the development and the scope for developing elsewhere outside the designated area. The purpose of paragraph 116 of the NPPF is that major development should be avoided within nationally protected landscapes (other than in qualifying exceptional circumstances) to ensure the long term legal protection of the AONB is maintained. The provision of affordable homes is also not considered to be an exceptional circumstance in its own right for the purposes of paragraph 116 of the NPPF.

Local Planning Authorities should therefore look at all settlements and sites outside nationally protected landscapes and follow the core planning principle of the NPPF (paragraph 17) in providing allocations of land for development to land of lesser environmental value. Winchcombe is a settlement that has seen a number of recent housing sites come forward outside the AONB. The immediate local needs of the settlement, in terms of housing and affordable housing, as well as the District as a whole in terms of its 5 year housing supply, are therefore being addressed. It would be more appropriate therefore for Tewkesbury Borough, as it is already doing, to direct development to other sustainable locations outside and away from the edge of the AONB. There is therefore no priority at this point in time in relation to the provision of housing and affordable housing on this site, that would outweigh the harm from this development on the countryside of the AONB.

The assessment of "major development" and the application of paragraph 116 of the NPPF is for the decision taker (the Council in this case) to decide on based on local context, though the attached Ashton Under Hill appeal for 25 dwellings within the Cotswolds AONB is of note. In addition as the Inspector noted in respect of the attached Willersey appeal (paragraphs 52 and 53), options exist outside the AONB where settlements straddle the AONB boundary. In addition Tewkesbury Borough has a greater area of land (as compared to Cotswold District) that is not designated as an AONB.

As part of the Neighbourhood Plan process this site has already been assessed through Winchcombe's Environmental Report, which stated in relation to this site (as part of 1a):

Impact on the AONB: *"Moderate adverse"*

and

"Too many adverse factors to meet SEA requirements"

- *Fails to respect historic character or Winchcombe's sense of place*
- *Fails to respect outstanding landscape, natural assets and setting of town*
- *Very poor connectivity (access on foot to the town centre shops)*
- *access to the Cheltenham bus service"*

In conclusion, this site has already been considered as unsuitable as part of the Neighbourhood Plan process; the Council need to consider whether Paragraph 116 of the NPPF is relevant and if not still ensure "great weight" is given to conserving landscape and scenic beauty given the nationally protected AONB status of the site; and at this point in time the need for this development does not outweigh the harm that would come from development within the AONB.