



STATEMENT OF CASE

COTSWOLDS CONSERVATION BOARD

Town and County Planning Act 1990

Section 78 Appeal

Planning appeal by: JJ Gallagher and Mr Richard Cook

Location: Land off Ashmead Drive, Cobblers Close, Gotherington, Cheltenham, Gloucestershire
Development: Outline planning application with means of access from Ashmead Drive to be determined (all other matters reserved for subsequent approval), for the erection of up to 50 dwellings (Class C3); earthworks; drainage works; structural landscaping; formal and informal open space; car parking; site remediation; and all other ancillary and enabling works

Tewkesbury Borough Council Reference: 19/01071/OUT

Planning Inspectorate Reference: APP/G1630/W/20/3256319

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1.0 INTRODUCTION

- 1.1 The Cotswolds Conservation Board ('the Board') originally objected to planning application 19/01071/OUT, for the proposed development of up to 50 dwellings in Gotherington, on 12 June 2020.
- 1.2 The proposed development would be located in the setting of the Cotswolds Area of Outstanding Natural Beauty (AONB). The Board objected to the proposed development because of the potentially significant adverse effects that the development would have on the purpose of AONB designation, which is to conserve and enhance the natural beauty of the AONB. In particular, the Board was concerned about the potential adverse effects of the proposed development on views from and to the AONB.
- 1.3 The Board applied to the Planning Inspectorate for Rule 6 status, in relation to this appeal, on 18 September 2020. The Planning Inspectorate confirmed Rule 6 status for the Board on 21 September 2020 and required a final statement of case to be submitted by 19 October 2020.
- 1.2 One of the key factors in the Board applying for Rule 6 status was that the Board's objection to the proposed development was a key factor in Tewkesbury Borough Council's decision to refuse planning permission for the proposed development.
- 1.3 Given that the Board's objection was a key factor in this decision, the Board and the Borough Council consider that it is important that the Board's objections are addressed in detail at the appeal inquiry. Rule 6 status provides an effective mechanism for achieving this. It is hoped that the Board's input will add substantively to the case being made by Tewkesbury Borough Council in objecting to the appeal.
- 1.4 The Board's Planning & Landscape Lead is the Board's only officer who deals with planning-related issues across the 2,000km² of the National Landscape, including the 15 local authority areas that overlap with it. With this limited staff resource, it is very unusual for the Board to become a Rule 6 party in a planning appeal. The fact that the Board has done so for this appeal reflects the significance of the appeal.
- 1.6 It is important to note that, as of 14 September 2020, the Board refers to the Cotswolds AONB as the Cotswolds National Landscape (and encourages other organisations to do likewise). This change in name reflects one of the proposals in the Government-commissioned Landscapes Review, which was to rename all AONBs as National Landscapes.¹ However, as 'Conservation Board' and 'AONB' are still the relevant legal and national and local planning policy nomenclature, these are the terms that are used in this statement of case.

2.0 THE PROPOSED DEVELOPMENT

- 2.1 Full details of the proposed development and Tewkesbury Borough Council's decision to refuse planning permission are provided in the Borough Council's statement of case. As such, the Cotswolds Conservation Board does not consider it necessary to expand on this information in this statement of case.

¹ <https://www.gov.uk/government/publications/designated-landscapes-national-parks-and-aonbs-2018-review>

3.0 THE COTSWOLDS CONSERVATION BOARD'S CASE

3.1 Summary

- 3.1.1 The interest of the Cotswolds Conservation Board in planning application 19/01701/OUT and planning appeal APP/G1630/W/20/3256319 primarily relates to the potential visual impact of the proposed development on views from and to the Cotswolds Area of Outstanding Natural Beauty (AONB), the boundary of which lies approximately 360m to the north and 740m to the east of the proposed development.
- 3.1.2 The Board considers that the proposed development would have a significant adverse visual effect on receptors on the footpath on the upper, western slopes of Nottingham Hill (Viewpoint 8 in the applicant's Landscape and Visual Impact Assessment (LVIA)). This would constitute a significant adverse impact on the natural beauty of the Cotswolds AONB, in particular, its scenic beauty.
- 3.1.3 The Board considers that there would be a significant adverse visual effect because the mass of development - which is primarily to the south of the proposed open space and to the south of the linear, east-west form of the settlement of Gotherington - would create a very strong impression that the gap between Gotherington and Bishops Cleeve has been reduced. The development would also further erode the linear character and form of the settlement and disproportionately increase its overall mass and size, making it more visually prominent in views from the AONB.
- 3.1.4 These effects are even more significant when the cumulative impact of the proposed development and the recent Malleson Road development are taken into consideration.
- 3.1.5 The Board considers that the visual effects for receptors on Cleeve Common would be at least minor, for similar reasons to those given in relation to Viewpoint 8, albeit with a smaller scale of change due to the greater distance involved.
- 3.1.6 The Board is also concerned that the visual effects on receptors on the footpaths within – and around the boundary – of the development site have been underestimated. Views to the escarpment (including views from outside the AONB) are one of the special qualities of the AONB. The on-site footpaths provide impressive views along a 180 degree panorama of a substantial length of the escarpment and escarpment outliers. These views would be obstructed (or significantly reduced)
- 3.1.7 The Board recognises that the opinions expressed in this statement of case differ from the views expressed:
- in the landscape advice provided to Tewkesbury Borough Council by Toby Jones Associates, in relation to both planning application 19/01071/FUL and the Landscape And Visual Sensitivity Study for Rural Service Centres and Service Villages;²
 - by the planning inspector in the appeal decision for planning appeal APP/G1630/W/17/3175559 (Land Off Ashmead Drive, Gotherington).³

² Toby Jones Associates Ltd (2014) *Landscape and Visual Sensitivity Study – Rural Service Centres and Service Villages*. Report commissioned by Tewkesbury Borough Council. ([Link](#)).

³ The Planning Inspectorate (2014) Appeal Decision: APP/G1630/W/17/3175559. 27 April 2018. ([Link](#)).

3.1.9 However, we consider that these appraisals have significantly under-valued the views from and to the AONB and the scale of change that would be experienced in these views as a result of the proposed development.

3.1.10 With regards to the presumption in favour of sustainable development, the Board considers that the 'tilted balance' should not be applied (i.e. there should not be a presumption in favour of granting planning permission). This is because, based on relevant case law, we consider that paragraph 11d(i) and footnote 6 of the National Planning Policy Framework (NPPF) apply, which provides an exception to the tilted balance.

3.2 Cotswolds AONB Context

3.2.1 The statutory purpose of AONB designation is to conserve and enhance the natural beauty of AONBs. Local planning authorities have a statutory duty to have regard to this purpose when making planning decisions that could affect the AONB. Under paragraph 172 of the NPPF, LPAs are also required to give great weight to conserving and enhancing the landscape and scenic beauty of AONBs, which have the highest status of protection in this regard.

3.2.2 The views from and to the Cotswold escarpment (including escarpment outliers) are one of the 'special qualities' of the AONB. In other words, these views are:

- one of the aspects of the AONB's natural beauty which make the area distinctive and which are valuable at a national level;
- one of the key attributes on which the priorities for the AONB's conservation, enhancement and management should be based.

3.2.3 The dramatic panoramic views over the Severn Vale from the escarpment are also one of the key features of the Escarpment and Escarpment Outlier landscape character.⁴

3.2.4 As stated in National Planning Practice Guidance, '*land within the setting of [AONBs] often makes an important contribution to maintaining their natural beauty*'.⁵ For example, in this instance, the views, both out of and into the AONB, are a key component of the scenic beauty of the Cotswolds AONB. As outlined above, this scenic beauty must be given great weight in planning decisions.

3.2.5 The Cotswolds AONB Landscape Strategy and Guidelines (LSG) identifies a number of potential landscape implications relating to new development on (and in the setting of) the escarpment, or scarp.⁶ These include:

- Erosion of the setting of the AONB.
- Degradation of the view from the scarp / outliers across the adjoining vale and from the vale looking at the scarp / outliers.
- Erosion of distinctive form, scale and character of smaller settlements along the base of the Scarp.

⁴ https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/08/3_TheCotswoldsLandscape_1.pdf.

Landscape Character Type (LCT) 1 (Escarpment Outlier) and LCT 2 (Escarpment).

⁵ <https://www.gov.uk/guidance/natural-environment#landscape>. Paragraph 042.

⁶ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/07/lct-2-escarpment-2016.pdf> (Section 2.1 - New Development – Potential Landscape Implications) and <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/07/lct-1-escarpment-outliers-2016.pdf> (Section 1.1 – New Development – Potential Landscape Implications)

- Erosion of organic growth and linear patterns of settlements bordering roads fringing the lower slopes of individual outliers including their relationship to the landscape.
- Interruption, weakening or loss of the historic character of settlements and the historic context in how they have expanded.
- Loss of characteristic small scale settlements due to settlement growth and coalescence.
- Proliferation of housing estate layout.

3.2.6 The guidelines for addressing these implications include:

- Avoid development that will intrude negatively into the landscape and cannot be successfully mitigated.
- Ensure new development is proportionate and does not overwhelm the existing settlement.
- Conserve linear pattern of settlements fringing the lower slopes of the hills and the rural road network linking them.
- Conserve the distinctive orientation of linear villages along the base of the outliers.
- Avoid cramming development right up to the boundaries resulting in hard suburban style edge to the settlement.

3.2.7 Permitting development that exacerbated the ‘potential landscape implications’ and that was contrary to the LSG guidelines would also be contrary to the policies of the Cotswolds AONB Management Plan 2018-2023 (particularly policies CE1 and CE10).⁷ Permitting development that is not consistent with the policies of the Cotswolds AONB Management Plan would be contrary to the Gloucestershire, Cheltenham and Tewkesbury Joint Core Strategy (Policy SD7).

3.2.8 The Board’s Position Statement on Development in the Setting of the Cotswolds AONB provides additional useful context on such development.⁸

3.3 Visual Impact (AONB)

3.3.1 The applicant’s Landscape and Visual Appraisal (LVA) identifies four viewpoints within the Cotswolds AONB (viewpoints 5, 7, 8 and 10) and one on the AONB boundary (viewpoint 6). The Board’s Planning & Landscape Officer has visited four of these viewpoints (viewpoints 5, 6, 8 and 10).

3.3.2 We also consider the views from the footpaths on the site towards the AONB to be an important consideration, given that the views to the escarpment are one of the special qualities of the AONB and that degradation of views from the vale towards the escarpment is identified as a ‘potential landscape implication’ for new development in the Cotswolds AONB Landscape Strategy and Guidelines. The large number of footpaths that cross the site – and the extensive use of these paths by local residents - make this issue particularly significant.

3.3.3 Given the importance and quality of these views - and the potential adverse effects of the proposed development on these views – the Board considers that it was a significant oversight for these views not to be more thoroughly assessed in the applicant’s LVA.

3.3.4 [Viewpoint 8 \(Nottingham Hill\) – see Figure 1, Appendix B](#)

⁷ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2018/12/Management-Plan-2018-23.pdf>

⁸ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/08/setting-position-statement-2016-adopted-with-minor-changes-30616-1.pdf>

- 3.3.4.1 The LVA identifies the overall visual effect for receptors at this viewpoint to be moderate adverse. This is the only LVA viewpoint where the LVA identifies the overall visual effect as being adverse.
- 3.3.4.2 The LVA asserts that the magnitude of change would be low because the development would not extend the edge of Gotherington southwards but would, instead, fill the indent in the southern settlement edge. This reflects the opinions expressed by the Borough Council's landscape consultant at the time that the planning application was submitted (Toby Jones) and the planning inspector in the 2018 planning appeal decision relating to this site (APP/G1630/W/17/3175559).
- 3.3.4.3 However, the Board strongly disagrees with the conclusion that the magnitude of change would be low and the reasons for reaching this conclusion, as outlined below.
- 3.3.4.4 Firstly, Gotherington features prominently in the view from Nottingham Hill, being one of the closest features at the foot of the escarpment that is visible from this viewpoint. This prominence is made even more significant by the fact that the extent of the north-south panorama across the vale, from this viewpoint, is relatively restricted by the woodland to the north and south of the viewpoint. As such, any new development on the south side of Gotherington is also likely to feature prominently in this view.
- 3.3.4.5 The Board acknowledges that there is some degree of development on three sides of the proposed development site. However, when seen from Nottingham Hill, the 'finger' of development to the west of the site, which primarily consists of a caravan park, is relatively unobtrusive. From the Nottingham Hill viewpoint, this finger of development does not convey a sense of Gotherington extending southwards into the 'Gotherington Gap'.
- 3.3.4.6 Similarly, the single row of approximately seven dwellings that forms the finger of development to the south-east of the site is also relatively unobtrusive. As such, the extent to which it contributes to the sense of Gotherington extending southwards into the Gotherington Gap is limited.
- 3.3.4.7 The Board acknowledges that the housing along the southern end of Cleeve Road and The Lawns is more intrusive. However, even with this housing, the open backdrop of the currently undeveloped greenfield land (i.e. the proposed development site) helps to reduce the impression of the village extending southwards.
- 3.3.4.8 In comparison to the current baseline, the proposed development would introduce a significant mass of housing between the current fingers of development on the western and eastern boundaries of the site. When seen from Nottingham Hill, this would result in a strong perception that Gotherington was being extended southwards into the Gotherington Gap.
- 3.3.4.9 This point is reinforced by the fact that the development would result in the number of dwellings in Gotherington increasing by a significant 10%⁹, compared to the current baseline (or 22% when combined with the Malleson Road development, compared to the 2011 baseline)). This increase is disproportionate to the existing settlement, especially when one considers the prominence of Gotherington in the view from Nottingham Hill.

⁹ According to the information on www.nomisweb.co.uk there were 448 dwellings in the 'built environment' of Gotherington at the time of the 2011 census. The Malleson Road development has increased this by 50 dwellings, bringing the total to approximately 500 dwellings. Therefore, a development of a further 50 dwellings would represent a 10% increase in the number of dwellings.

- 3.3.4.10 At present, the undeveloped greenfield land of the proposed development site helps to create a sense of openness across the Gotherington Gap that extends from the northern edge of Bishops Cleeve to the north-east corner of the proposed development site (as demarcated in Figure 3, Appendix B). However, if the proposed development was permitted, this sense of openness would only extend from the northern edge of Bishop's Cleeve to the south-west corner of the proposed development site. This would reduce this sense of openness (in terms of the distance from the northern edge of Bishops Cleeve) by approximately 35%.
- 3.3.4.11 Even if the sense of openness was only considered to extend as far as the edge of the relatively high density housing in Gotherington (as demarcated in Figure 3, Appendix B), the proposed development would still reduce this sense of openness by approximately 20%. In effect, when viewed from Nottingham Hill, it would create the perception that the Gotherington Gap was being reduced in width by 20%.
- 3.3.4.12 The majority of the proposed new housing would be located well to the south of the east-west through road. As such, it would further erode (and potentially lose) Gotherington's historical linear character and form. This linear character and form is a notable feature of the view of Gotherington from Nottingham Hill. As such, the erosion and potential loss of Gotherington's linear character and form would also adversely affect the view from Nottingham Hill.
- 3.3.4.13 Based on the points outlined above, the Board considers that the magnitude of change (to use the LVA's terminology) would be at least moderate. When this moderate magnitude of change is combined with the very high sensitivity of the visual receptors at this viewpoint, the overall visual effect would be significant. This would mean that the development would also have a significant adverse effect on the Cotswolds AONB, in particular, its scenic beauty / quality.
- 3.3.5 Viewpoint 10 (Cleeve Common) – see Figure 2, Appendix B
- 3.3.5.1 The Board acknowledges that the scale of visual change is likely to be less significant for visual receptors on Cleeve Common than for visual receptors on Nottingham Hill, particularly given the distance separating the development site and Cleeve Common.
- 3.3.5.2 However, many of the points made in relation to Viewpoint 8 are still valid for Viewpoint 10, albeit at a smaller scale. For example, the development would still create the impression that the gap between Gotherington and Bishops Cleeve was being reduced. In addition, Gotherington would become more prominent in views from the escarpment (albeit with Bishops Cleeve still dominating the view).
- 3.3.5.3 In addition, one of the factors that contributes to the size / scale of visual effects is *'the nature of the view of the proposed development, in terms of the relative amount of time over which it will be experienced and whether views will be full, partial or glimpsed'*. On Cleeve Common there are multiple footpaths, including the Cotswold Way National Trail and Winchcombe Way, on which the proposed development site can be seen for long periods of time by walkers using the footpaths. The whole of Cleeve Common is access land, where a wide range of recreational users can also see the proposed development site for long periods of time.
- 3.3.5.4 With these points in mind, the Board considers that the visual 'magnitude' would be at least 'low', rather than 'very low' (as proposed in the LVA) and the overall visual effect would at least be adverse rather than neutral. A low adverse magnitude combined with a very high 'sensitivity', would result in an overall moderate adverse visual effect.

3.3.6 Views from the proposed development site towards the Cotswolds AONB

- 3.3.6.1 As outlined above, views from the vale towards the Cotswold escarpment are one of the special qualities of the Cotswolds AONB.
- 3.3.6.2 In the context of the proposed development, the views from footpaths on the development site take in a 180 degree panorama of the escarpment and escarpment outliers of the Cotswolds AONB, extending many kilometres from Crane Hill the north, to Cleeve Hill to the south east.
- 3.3.6.3 As Shown in Figure 4, Annex B, the views to Nottingham Hill and Cleeve Hill from the footpath that runs from the western edge to the north eastern corner of the site are particularly outstanding, with these views currently being uninterrupted by intervening development. These views would be permanently blocked (or significantly reduced) by the proposed development, as housing would be built immediately to the south / south east of this path.
- 3.3.6.4 It is very surprising that the applicant's LVA only focussed on views looking north-east from this viewpoint (Viewpoint 1 in the LVA) towards Oxenton Hill, rather than on the views looking south-east towards Nottingham Hill and Cleeve Hill, given that the south-easterly views are more impressive and would be more adversely affected by the proposed development.
- 3.3.6.5 As shown in Figure 5, Annex B, in the views looking north from the southern edge of the site, Crane Hill and, in particular, Oxenton Hill provide an impressive backdrop to the village of Gotherington. Again, these views would be permanently blocked (or significantly reduced) by the proposed development, as housing would be built immediately to the north of this path.

3.3.7 Viewpoints 5 and 6

- 3.3.7.1 Based on the Board's site visits, the Board agrees that the 'magnitude of change' for receptors at viewpoints 5 and 6 would be low or very low. We also agree that the nature of the visual effect would be neutral.

3.4 **Presumption in Favour of Sustainable Development**

- 3.4.1 The applicant's Planning Statement asserts that the Borough Council cannot demonstrate a five year supply of housing and that there should therefore be a presumption in favour of granting planning permission (known as the 'tilted balance'), in line with footnote 7 of the National Planning Policy Framework (NPPF).
- 3.4.2 However, as outlined in paragraph 11d(i) and footnote 6 of the, this presumption does not apply if '*the application of policies in [the NPPF] that protect areas or assets of particular importance provides a clear reason for refusing the development proposed*', including the policies relating to AONBs.
- 3.4.3 There has been some debate in planning case law as to whether the exception outlined in paragraph 11d(i) and footnote 6 just relates to major development in AONBs (i.e. the second part of paragraph 172 of the NPPF) or whether it applies to all parts of paragraph 172.
- 3.4.4 *Monkhill Ltd v Secretary of State for Housing, Communities And Local Government* [2019] EWHC 1993 (Admin) (24 July 2019),¹⁰ clarifies that the exception outlined in paragraph 11d(i) and footnote 6 of the NPPF applies to all parts of paragraph 172 of the NPPF, not just to the

¹⁰ <https://www.bailii.org/ew/cases/EWHC/Admin/2019/1993.html>

second part relating to major development. For example, paragraph 60 of this case law states that:

- *'As a matter of law, none of them [i.e. the first parts of paragraphs 172 and 173 and paragraph 196 of the NPPF] lacks any element necessary to found a freestanding reason for refusal of permission, or to engage paragraph 11(d)(i) of the NPPF.'*

3.4.5 Paragraph 172 of the NPPF applies in relation to the proposed development at Gotherington (i.e. great weight has to be given to conserving and enhancing the natural beauty of the AONB, which has the highest status of protection in this regard). As such, the Board would argue that paragraph 11d(i) and footnote 6 of the NPPF also apply and that the presumption in favour of granting planning permission (i.e. the tilted balance) should not apply.

3.4.6 The fact that the proposed development at Gotherington has been identified, in the LVIA, as having an adverse visual effect on receptors in the Cotswolds AONB (Viewpoint 8) – and that the Board considers this adverse effect to be significant – adds further weight to this argument.

APPENDIX A. REFERENCE DOCUMENTS AND WEBSITES (in alphabetical order)

Appeal Decision APP/G1630/W/17/3175559 (Land Off Ashmead Drive, Gotherington). 27 April 2018.

<https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3175559>

Cotswolds Area of Outstanding Natural Beauty (AONB) Landscape Character Assessment

<https://www.cotswoldsaonb.org.uk/our-landscape/landscape-character-assessment/>

Cotswolds AONB Landscape Strategy and Guidelines

<https://www.cotswoldsaonb.org.uk/our-landscape/landscape-strategy-guidelines/>

- In particular, the Cotswolds AONB Landscape Strategy and Guidelines for:
 - o Landscape Character Type (LCT) 2 – Escarpment
 - <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/07/lct-2-escarpment-2016.pdf>
 - o LCT 1 – Escarpment Outliers
 - <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/07/lct-1-escarpment-outliers-2016.pdf>
 - o LCT 18 – Settled Unwooded Vale
 - <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/07/lct-1-escarpment-outliers-2016.pdf>

Cotswolds AONB Management Plan 2018-2023

<https://www.cotswoldsaonb.org.uk/wp-content/uploads/2018/12/Management-Plan-2018-23.pdf>

Cotswolds Conservation Board Position Statement on Development in the Setting of the AONB

<https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/08/setting-position-statement-2016-adopted-with-minor-changes-30616-1.pdf>

Cotswolds Conservation Board objection to planning application 19/01071/OUT, dated 12 June 2020

<https://www.cotswoldsaonb.org.uk/wp-content/uploads/2020/06/19.01071.OUT-CCB-comments-12-June-2020.pdf>

Gloucester, Tewkesbury and Cheltenham Joint Core Strategy (JCS) (N.B. JCE website not available on 19 October 2020)

Gotherington Neighbourhood Plan 2011-2031

<https://www.tewkesbury.gov.uk/neighbourhood-development-plans/gotherington-neighbourhood-plan>

Landscape and Visual Sensitivity Study – Rural Service Centres and Service Villages (2014). Report by Toby Jones Associates for Tewkesbury Borough Council. ([Link](#)).

Monkhill Ltd v Secretary of State for Housing, Communities and Local Government [2019] EWHC 1993 (Admin) (24 July 2019)

<https://www.bailii.org/ew/cases/EWHC/Admin/2019/1993.html>

National Planning Policy Framework

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

Nomis – Official Labour Market Statistics

<https://www.nomisweb.co.uk/>

Planning Practice Guidance – Natural Environment

<https://www.gov.uk/guidance/natural-environment>

Statement of Case – Appellant

https://publicaccess.tewkesbury.gov.uk/online-applications/files/A5C3B9AB12835F5F8A4FC876C837CDC9/pdf/19_01071_OUT-STATEMENT_OF_CASE-880404.pdf

Statement of Case – Tewkesbury Borough Council

[https://publicaccess.tewkesbury.gov.uk/online-applications/files/818B4AFDB26AA8E33A05077340B1A0EC/pdf/19_01071_OUT-COUNCIL S STATEMENT OF CASE-887576.pdf](https://publicaccess.tewkesbury.gov.uk/online-applications/files/818B4AFDB26AA8E33A05077340B1A0EC/pdf/19_01071_OUT-COUNCIL_S_STATEMENT_OF_CASE-887576.pdf)

Statement of Common Ground – Tewkesbury Borough Council / JJ Gallagher Limited and Mr Richard Cook)

[https://publicaccess.tewkesbury.gov.uk/online-applications/files/799172E64302E317B2C7BAE19E996758/pdf/19_01071_OUT-STATEMENT OF COMMON GROUND-888946.pdf](https://publicaccess.tewkesbury.gov.uk/online-applications/files/799172E64302E317B2C7BAE19E996758/pdf/19_01071_OUT-STATEMENT_OF_COMMON_GROUND-888946.pdf)

Tewkesbury Borough Local Plan 2011 – 2031 (Pre-submission version)

<https://www.tewkesbury.gov.uk/pre-submission-tewkesbury-borough-plan>

Tewkesbury Borough Local Plan to 2011 (March 2006)

<https://www.tewkesbury.gov.uk/local-plan#saved-policies-of-tb-local-plan>

APPENDIX B. PHOTOGRAPHS OF THE PROPOSED DEVELOPMENT SITE FROM NOTTINGHAM HILL AND CLEEVE HILL AND OF THE COTSWOLDS AONB FROM THE PROPOSED DEVELOPMENT SITE

See next page.

FIGURE 1. VIEW OF GOTHERINGTON FROM FOOTPATH ON NOTTINGHAM HILL IN THE COTSWOLDS AREA OF OUTSTANDING NATURAL BEAUTY (@ GR: SO97852872) @ 1.7KM EAST-SOUTH-EAST OF THE PROPOSED DEVELOPMENT (50MM FOCAL LENGTH, SINGLE PHOTOGRAPH) – DEVELOPMENT BOUNDARY SHOWN AS A RED LINE. (N.B. VIEWPOINT 7 IN THE APPLICANT’S LANDSCAPE & VISUAL APPRAISAL).



FIGURE 2. VIEW FROM THE HIGHEST POINT ON CLEEVE HILL / COMMON ON THE COTSWOLD WAY NATIONAL TRAIL (@ GR: SO98562639) @ 3.7KM SOUTH EAST OF THE PROPOSED DEVELOPMENT (50MM FOCAL LENGTH, SINGLE PHOTOGRAPH) – DEVELOPMENT BOUNDARY SHOWN AS A RED LINE. (N.B. VIEWPOINT 10 IN THE APPLICANT’S LANDSCAPE & VISUAL APPRAISAL).



FIGURE 3. PANORAMA OF THE GOTHERINGTON GAP FROM NOTTINGHAM HILL (@ GR: SO97852872) (N.B. VIEWPOINT 7 IN THE APPLICANT'S LANDSCAPE & VISUAL APPRAISAL).

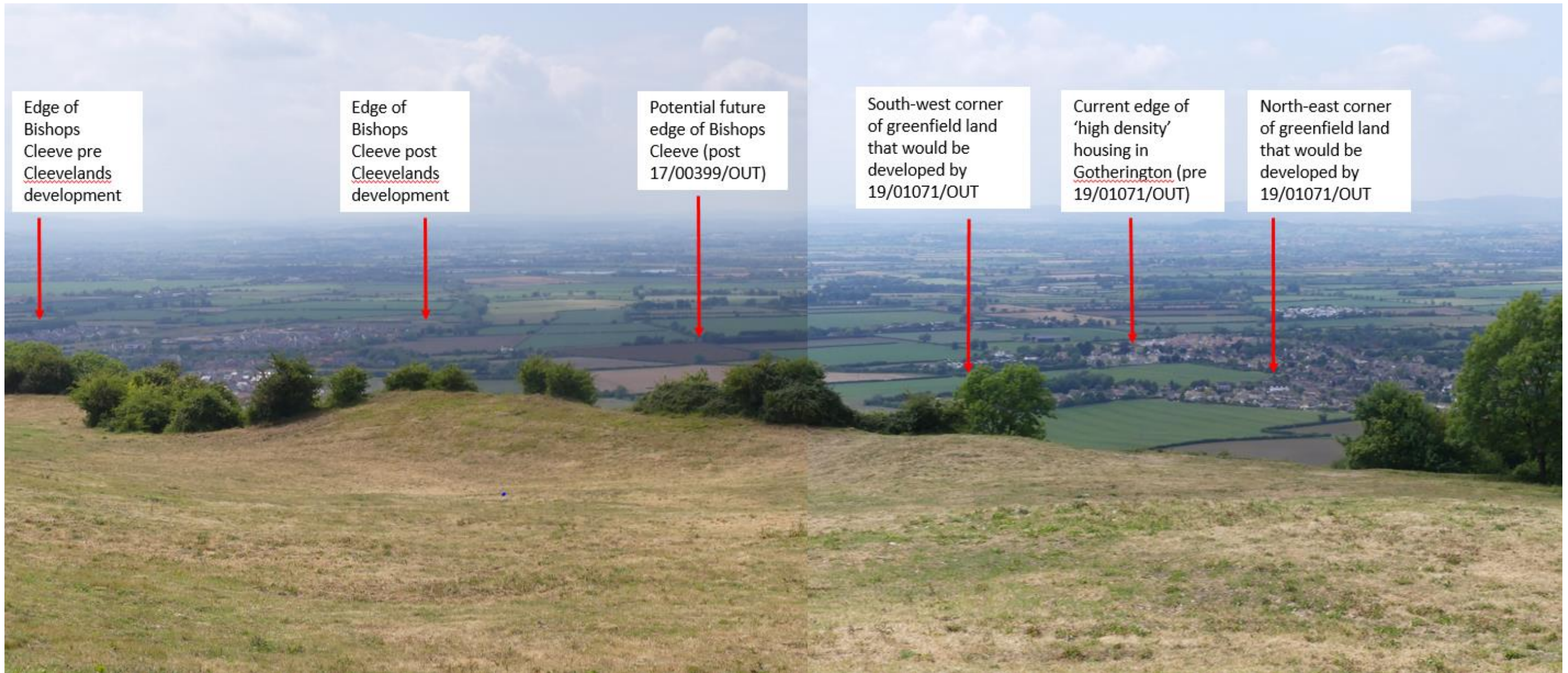


FIGURE 4. PANORAMIC VIEW OF NOTTINGHAM HILL AND CLEEVE HILL, LOOKING SOUTH EAST FROM THE PATH AT THE WEST SIDE OF THE PROPOSED DEVELOPMENT SITE (@ GR: SO96052941) (N.B. VIEWPOINT 1 IN THE APPLICANT'S LANDSCAPE & VISUAL APPRAISAL).



FIGURE 5. PANORAMIC VIEW OF CRANE HILL AND OXENTON HILL LOOKING NORTH-NORTH WEST FROM THE PATH AT THE SOUTH WEST CORNER OF THE PROPOSED DEVELOPMENT SITE (@ GR: SO96042927)

