

12th June 2020

Catherine Ashby
Development Management Team Leader
Tewkesbury Borough Council
Gloucester Road
Tewkesbury
GL20 5TT



By email only to catherine.ashby@teiwkesbury.gov.uk

Dear Catherine

17/00399/OUT - Construction of up to 500 new homes, a primary school, the formation of a new means of access onto Evesham Road, pedestrian and cycle linkages, associated open space, drainage infrastructure and new landscaping - Land To The West Of Evesham Road (North Cleavelands), Evesham Road, Gotherington

Thank you for consulting the Cotswolds Conservation Board ('the Board') on the above planning application.

The proposed development of up to 500 new homes and associated infrastructure lies within the setting of the Cotswolds Area of Outstanding Natural Beauty (AONB), approximately 1.3km from the AONB boundary. The site of the proposed development is overlooked by multiple, elevated AONB viewpoints on the Cotswold escarpment and escarpment outliers.

As indicated in the Government's Planning Practice Guidance (NPPG):

- *Land within the setting of [AONBs] often makes an important contribution to maintaining their natural beauty, and where poorly located or designed development can do significant harm. This is especially the case where long views from or to the designated landscape are identified as important.* (Natural Environment, paragraph 042, revised July 2019).

The Board recognises the need for new housing to be delivered in Tewkesbury Borough. This housing should be delivered in a way that is compatible with – and makes a positive contribution to – the purpose of AONB designation, which is to conserve and enhance the natural beauty of the AONB. However, as outlined below, we believe that the proposed development would have significant adverse effects on the AONB, particularly with regards to visual effects.

For this reason, the Board objects to the proposed development.

Landscape and Visual Impacts

The applicant's Landscape and Visual Impact Assessment (LVIA) asserts that, with regards to the Cotswolds AONB, '*the significance of effect upon visual impact is considered to be minor adverse before mitigation*' and '*ranges between minor/ negligible and negligible after mitigation measures have matured*'.

The Board strongly disagrees with these assertions. Instead, we agree with the comments made in the evidence base for the Tewkesbury Borough Plan and in the consultation response of Tewkesbury Borough Council's landscape consultant, as summarised in Annex 1. In particular, we agree that:

Conserving, enhancing, understanding and enjoying the Cotswolds Area of Outstanding Natural Beauty

- extending Bishops Cleeve beyond Dean Brook onto the rising ground of the proposed development site would significantly erode the perception of the gap between Bishops Cleeve and Gotherington (including when viewed from the AONB);¹
- the development would have an urbanising effect in numerous valued views from the AONB and would harm the setting of the AONB;
- the harm to views from the AONB (including views from popular long distance walking routes) and the harm to the setting of the AONB, when considered in combination and cumulatively with other recent and planned urban extensions, will be significant and adverse.

These opinions are supported by the findings of the Board's own site visit, which was carried out on 8 June 2020. Annotated photographs from this site visit are provided in a separate document (attached). These photographs mostly relate to the AONB viewpoints used in the LVIA, with the addition of a viewpoint on the footpath at the foot of Nottingham Hill. The document also compares the LVIA's assessment of the visual effects for receptors at these viewpoints, with the Board's own assessment of these effects.

From this assessment, it is the Board's opinion that the LVIA significantly underplays the significance of the visual effects for receptors at these viewpoints. We consider the visual effects at Viewpoint 2 (Nottingham Hill) to be particularly significant. It is in this location that the narrowing of the 'Gotherington Gap' and the coalescence of Bishops Cleeve and Gotherington would be particularly noticeable.

From the elevated AONB viewpoints on Nottingham Hill and Cleeve Common, the proposed green infrastructure and screening mitigation is unlikely to have a significant benefit because the whole site would still be clearly seen, even when the new vegetation is mature. As such, the adverse visual effects are unlikely to reduce significantly over time.

The applicant's LVIA does not meet current standards and should be updated to reflect best practice.² For example, the LVIA photographs only show an arrow to the proposed development site. At the very least the photographs should be annotated to show the extent of the proposed development. Ideally, for key viewpoints, such as those within the AONB, the photographs should provide a photomontage of what the development would look like upon completion and after, say, 15 years.

If you have any queries regarding the Board's response, please do not hesitate to get in touch.

Yours sincerely,



John Mills MRTPI
Planning and Landscape Officer

¹ For example, the proposed development would extend Bishops Cleeve approximately 500m further north along the A435, with its most northerly point being almost as far north as the most southerly point of the settlement of Gotherington,

² For example, the Landscape Institute's Technical Guidance Note 06/19 on the 'Visual Representation of Development Proposals'.

ANNEX 1. RELEVANT EXTRACTS FROM RELATED DOCUMENTS

TEWKESBURY BOROUGH PLAN 2011-2031 PREFERRED OPTIONS CONSULTATION – HOUSING BACKGROUND PAPER – SEPTEMBER 2018

Bishop's Cleeve Site 8 / BIS011

Site is of strategic scale so is beyond scope of [Tewkesbury Borough Plan]. However, in any event, site would be at odds with the morphology of Bishops Cleeve. Dean Brook provides a clear physical boundary to settlement. Site would also risk Bishops Cleeve sprawling northwards in the direction of Gotherington and would erode rural setting of Gotherington ... Site is considered to be unsuitable for development.

TEWKESBURY BOROUGH COUNCIL – LANDSCAPE SENSITIVITY STUDY – ADDITIONAL SITE OPTIONS AT BISHOP'S CLEEVE – FEBRUARY 2018

Bishop's Cleeve Site BIS011

It is prominent on the approach to Bishops Cleeve along the A435 from the north and contributes to the sense of place between Bishops Cleeve and Gotherington.

The exposed and slightly elevated nature of the site means that new residential development would be prominent and conspicuous.

Development here would significantly extend the influence of the settlement with a strong urbanising effect.

Development here would be conspicuous with few opportunities to mitigate harm. It would intrude into essentially open countryside.

Recommendation and Guidelines: Medium to large scale development on this land parcel should be avoided. Dean Brook provides a robust and defensible settlement edge. Extending Bishops Cleeve beyond Dean Brook onto the rising ground of the site would significantly erode the perception of the gap between Bishops Cleeve and Gotherington.

This is part of a vast open vale landscape and there are widespread and distant views to surrounding hills.

Dean Brook and its associated riparian trees represent a strong and 'defensible' landscape feature forming the settlement edge. The site beyond the brook plays a role in preventing the erosion of the gap between Bishops Cleeve and Gotherington.

The 2014 Study of land around Rural Service Centres did not consider the land beyond Dean Brook because it is such a strong landscape feature and natural restraint to further expansion of Bishops Cleeve to the north.

The landform makes the site very prominent in views and would ensure that development upon it would exert a very strong visual influence.

CONSULTATION RESPONSE OF TEWKESBURY BOROUGH COUNCIL'S LANDSCAPE CONSULTANT, TOBY JONES ASSOCIATES, 4 MAY 2018

I have significant concerns about the scale and location of the development proposed in this application as follows:

- It occupies a sloping site beyond a very robust and defensible settlement edge formed by Dean Brook and in this respect could be perceived as “sprawl” up the slope away from Bishops Cleeve and weakening the settlement edge to the north.
- It is an open and exposed site within the Gotherington Gap and development here would materially reduce the perception of separation between Gotherington and Bishops Cleeve.
- That the development would harm the setting of the AONB. It would have an urbanising effect in numerous valued views from the AONB. It would also truncate views of the sweeping Cotswold Scarp from the A435 as it approaches Bishops Cleeve from the north.
- That the harm to views from the AONB (including views from popular long distance walking routes), the harm to the setting of the AONB and the harm to local landscape character when considered in combination and cumulatively with other recent and planned urban extensions will be significant and adverse.