



CHELTENHAM BOROUGH COUNCIL

Notice of a meeting of Planning Committee

**Thursday, 20 May 2021
2.00 pm
Council Chamber - Municipal Offices**

Membership- To be confirmed at Annual and Selection Council 17 May	
Councillors:	Paul Baker, Garth Barnes, Dilys Barrell, Bernard Fisher, Stephan Fifield, Paul McCloskey, Tony Oliver, John Payne, Richard Pineger, Diggory Seacome and Simon Wheeler

The Council has a substitution process and any substitutions will be announced at the meeting.

Important Notice

FILMING, RECORDING AND BROADCASTING OF PLANNING COMMITTEE MEETINGS

This virtual meeting will be recorded by the council for live broadcast online at <http://www.cheltenham.gov.uk> and www.youtube.com/user/cheltenhamborough. At the start of the meeting the Chair will confirm this.

If you make a representation to the meeting you are consenting to the use of those sound recordings for broadcasting and training purposes.

Agenda

- 1. APOLOGIES**
- 2. DECLARATIONS OF INTEREST**
- 3. DECLARATIONS OF INDEPENDENT SITE VISITS**
- 4. MINUTES OF LAST MEETING** (Pages 3 - 6)
Minutes of the meeting held on 22 April 2021
- 5. PLANNING/LISTED BUILDING/CONSERVATION AREA
CONSENT/ADVERTISEMENT APPLICATIONS,
APPLICATIONS FOR LAWFUL DEVELOPMENT
CERTIFICATE AND TREE RELATED APPLICATIONS –
SEE MAIN SCHEDULE**

- 5a **Villa Nova, Undercliff Terrace, Cheltenham** (Pages 7 - 46)
20/02296/FUL
[Planning Application Documents](#)
- 5b **1 Loweswater Road, Cheltenham 21/00505/COU** (Pages 47 - 60)
[Planning Application Documents](#)
- 5c **Pittville Pump Room, East Approach Drive,** (Pages 61 - 66)
Cheltenham 21/00579/LBC
[Planning Application Documents](#)
- 5d **Hanna Court, St Georges Place, Cheltenham** (Pages 67 - 72)
21/00683/FUL
[Planning Application Documents](#)
- 5e **Oakley Farm, Priors Road, Cheltenham** (Pages 73 - 530)
20/01069/OUT
[Planning Application Documents](#)
6. **APPEAL UPDATES** (Pages 531 - 532)
Appeals updates for information.
7. **ANY OTHER ITEMS THE CHAIRMAN DETERMINES URGENT AND REQUIRES A DECISION**

Contact Officer: Democratic Services,
Email: democraticservices@cheltenham.gov.uk

Planning Committee

**Thursday, 22nd April, 2021
2.00 - 3.02 pm**

Attendees	
Councillors:	Councillor Garth Barnes (Chair), Councillor Paul Baker (Vice-Chair), Councillor Dilys Barrell, Councillor Mike Collins, Councillor Stephen Cooke, Councillor Bernard Fisher, Councillor Paul McCloskey, Councillor John Payne, Councillor Diggory Seacome and Councillor Simon Wheeler
Officers in Attendance:	Ben Warren (Planning Officer), Claire Donnelly (Planning Officer), Mike Holmes (Interim Head of Planning) and Nick Jonathan (Solicitor)

1. Apologies

Apologies were received from Cllr Oliver.

2. Minutes of last meeting

The minutes of the last meeting held on 25 March 2021 were unanimously approved as a correct record.

3. Declarations of Interest

Cllrs Barrell and Barnes declared a non-prejudicial interest in item 5a and stated that all Liberal Democrat members were known to the applicant and would likely declare the same interest in the item.

Cllr Barrell declared an interest in item 5b as she was the local ward councillor.

Cllr Cooke declared an interest in item 5c as he was the local ward councillor.

4. Declarations of independent site visits

Cllrs Barrell, McCloskey, Cooke and Payne had visited all three sites.

Cllr Seacome had visited Hatherley Park.

Cllr Barnes had visited Hatherley Park and Hampton House.

5. Planning/Listed Building/Conservation Area Consent/Advertisement Applications, Applications for Lawful Development Certificate and Tree related applications – see Main Schedule**6. 20/01415/FUL & LBC Hampton House, Shurdington Road, GL53 ONH**

The Planning Officer presented the report relating to the erection of railings to the existing veranda of Hampton House, a Grade II list property in Shurdington Road. The application was before committee as the applicant was a local councillor.

There were no questions and no debate so the Chair moved to the votes on granting planning permission and listed building consent.

Upon the vote for planning permission:

For : 10

Against : 0

Abstain : 0

PERMITTED unanimously

Upon the vote for listed building consent:

For : 10

Against : 0

Abstain : 0

GRANTED unanimously

7. 21/00483/FUL Hatherley Park, Hatherley Court Road, Cheltenham, GL51 3AQ

The Planning Officer presented the report relating to the siting of a temporary structure on a purpose built hardstanding area to serve refreshments in a small area of Hatherley Park adjacent to the existing play area. The application was at committee as the structure was on council owned land.

In response to member questions the Officer replied as follows:

- Assumed it was connected to a mains supply, as although the cabin had solar panels this may not produce sufficient energy to power it.
- Conditions relating to waste collection and recycling would be part of the lease agreement.
- With regard to toilets, if it became clear these were required, the lease could stipulate that the applicant should provide such facilities and maintain them. The Council felt that if they provided toilet facilities this could attract anti-social behaviour and the public toilets there at the moment were not open.
- Confirmed the hard standing rubble and stone surface was put down only relatively recently. It was permeable, it would not be tarmacked and could be easily removed and grassed over.
- Difficult to say whether it was the kiosk itself or the impact of corona virus that had led to the increase in traffic and reduction in parking spaces.
- The horse box was designed based on a TV series that was filmed in Hatherley Park and that won them the lease from Property, so assume the bright blue colour and design was based on the butterfly box from that.

There being no further questions the Chair moved to debate and members made the following points:-

- Confirmed that the site had had a surface put down in the last 12 months.
- An objection was to the concrete hard standing, but in fact it was rubble and stone.
- Kiosk has been widely welcomed by residents. Good to have outside refreshments.
- Regarding the colour, probably got to go with the colour of the caravan that was there. However, as the kiosk was right by the children's play area which was also colourful, it was not felt the colour would have a big impact on the area.
- One member felt the issue of traffic around the entrance to the park was minimal and was not a problem.
- Another member felt there was a parking problem in the area and that it could be difficult to find a parking space and would be especially with commuters returning. This problem had been increasing since restrictions were put in place in Lansdown. However the park was in a residential area so people could walk there.
- Another suggested the parking could not be attributed to the kiosk; it was a well-used park and would always be busy around the entrance with people arriving and going and hoped that nothing would be done which would prevent that in the future.
- It appeared that recycling bins had now been put next to the normal litter bins, so once away from the kiosk the recyclable cups etc. from the kiosk could still be recycled. However it was stressed that bins should be emptied at busy times.
- Given that this application was for a temporary permission for 3 years only, some members felt it would need to be readdressed after that time and if it became permanent then agreed toilets would be required. It was pointed out that Pittville Park

now had some fairly permanent temporary toilets in place there. The ward councillor agreed that in the long term toilet facilities would be required as none there at present.

- A similar temporary refreshment facility was in place in Burrows Field which had gone down very well with residents and users and had not caused any problems.
- One objection related to being linked in to the electricity supply, however it was felt electric power was preferable to a potentially smelly noisy diesel generator.
- Members generally supported the kiosk and felt it would be a useful addition to the park. Parks were a vital part of the community and people should be encouraged to use them and the offer of refreshments would contribute to this.

There being no further comments or questions, the Chair moved to vote to permit the application as per the Officer's recommendation.

For : 10

Against : 0

Abstain: 0

PERMITTED unanimously

8. 21/00552/FUL 21 The Lanes, Cheltenham, GL53 0PU

The Planning Officer presented the report relating to a first floor side extension over an existing garage to a detached property in the residential area on The Lanes. This was a revised scheme to an application previously refused and was before Committee at the request of the ward councillor due to its impact on neighbouring amenity. The original application was for an extension to be built over both garages however the revised scheme was now reduced allowing 12m to the neighbour's rear elevation and Officers were now happy there was no overbearing impact. There was a condition on the restriction of new openings on the proposed extension.

The Chair invited Mrs Toni Wadley to speak in favour of the application. Mrs Wadley apologised for the absence of her husband and explained her recent major operation to remove a brain tumour. She stated that she was at high risk of needing a wheelchair if she required further surgery. They had lived in The Lanes for 14 years and had a young family and they were all involved with the local community which they loved. They wished to extend their space as their family grew and also to accommodate Mrs Wadley's aftercare. They had taken on board the feedback from the Planning Officers and amended their plans accordingly. They wished to increase the size of the smallest bedroom and to create a larger bedroom with an en-suite. They were keen to keep to the design of the existing house and blend in roof lines and building materials, with the idea to extend the house, not build an extension as such.

In response to members' questions, the Officer was requested to share his screen again to show the block plan and proposed elevations. He explained that the measurement of 12m was taken from the rear wall elevation of the neighbouring property and not from the protruding conservatory which was not generally taken into account.

With regard to the question that an extension should be subservient to the main building, the Officer replied that the supplementary planning document mentioned subservience with particular reference to semi-detached properties and this was not always applicable to detached properties. The Officer felt the width of this extension over just one garage meant some level of subservience was still achieved.

Finally the Officer clarified that his report focused mainly on the impact on 23 The Lanes as that was the reason for the refusal. The impact on 3 The Spindles had not caused any concern for Officers previously as the distance was what was expected with that neighbour, there was only one skylight on the rear elevation of the extension and there would be control on any future windows to maintain privacy.

There being no further questions the Chair moved to debate and the following comments were made by members:

- Following the Parish Council report on this, a member visited the site, and felt there was an impact on the neighbour's house but acknowledged that outlook and a view was not necessarily a planning issue. He felt that as the local councillor he felt the only way for fairness on this for both parties was to have an open and transparent debate. He could see both sides of the argument and as the local councillor would abstain from the vote.
- Despite earlier comments on subservience, this extension benefited from a shared roof height and that in time it would not be possible to distinguish between the new and old. Planned extension was sound and made good use of space. Understood concerns of no.23 but now it had been modified the impact was less and they would not suffer any loss of light. No. 3 The Spindles was far enough away and felt this was a practical solution for the residents.
- Not a fan of the ruling of subservience and in this case think it would look out of place. A good compromise and solution, gave applicant what they wanted and impact on neighbours minimal.

There being no further comments the Chair moved to vote to permit as per the Officer's recommendation.

For : 9

Against : 0

Abstain : 1

PERMITTED

9. Appeal Updates

In respect of the appeal relating to 24 Charlton Close, a member requested an explanation as to why this appeal had been allowed. The Head of Planning explained that the Officer's recommendation had been to approve, however members had been concerned about issues between the neighbours, which, as had been alluded to at the time, the inspector did not have regard to and was not a matter for his consideration.

Another member challenged this, stating the committee's main concern had been that the extension was 30% bigger than the agreed planning permission and that by allowing that increase and knowing about that before it was completed, the Officers had caused a dispute between the neighbours regarding boundaries. The decision of planning inspectors has to be adhered to, but the member felt that national policy did not work all the time when relating to local issues.

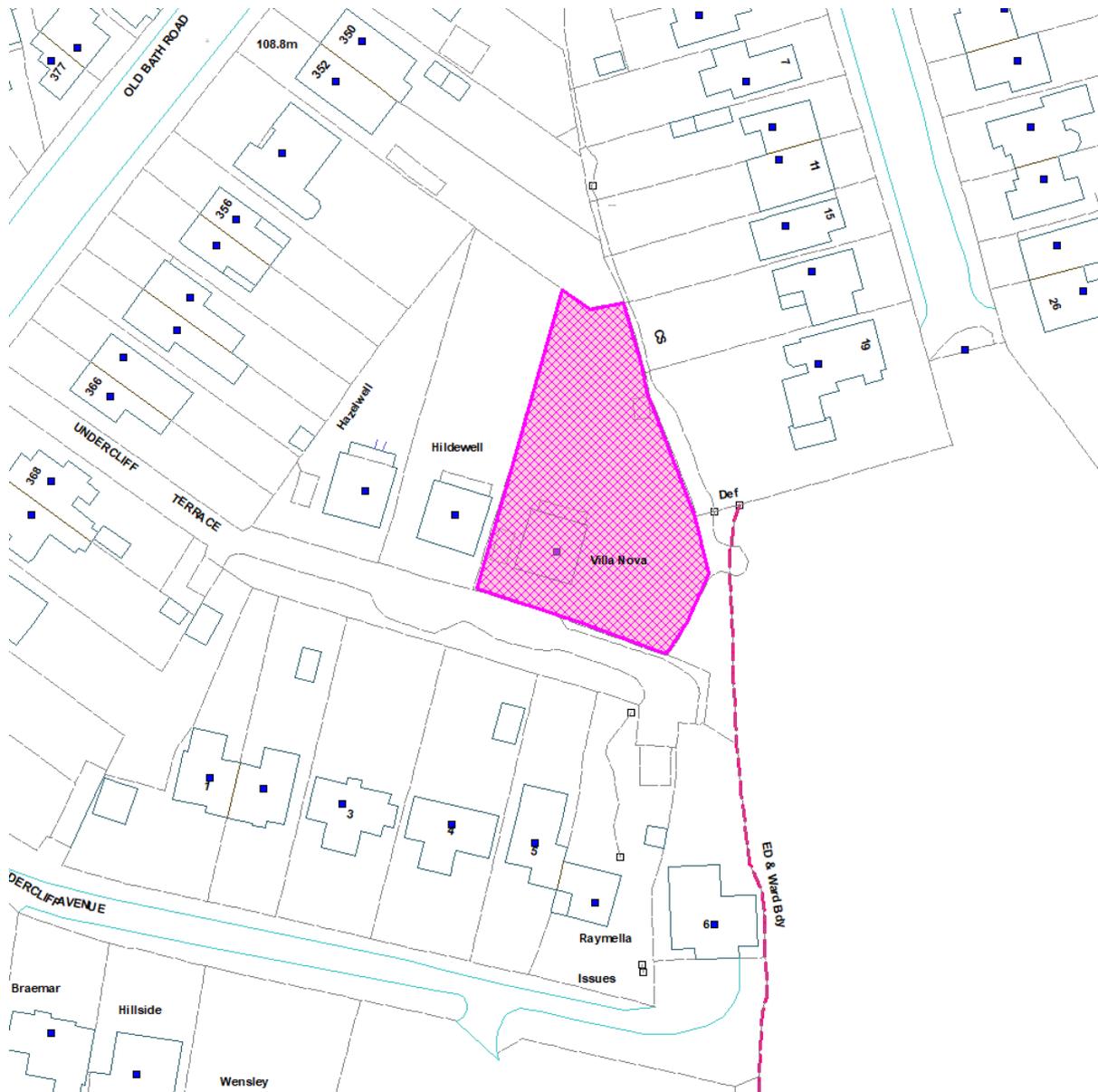
10. Any other items the Chairman determines urgent and requires a decision

There were none.

Chairman

APPLICATION NO: 20/02296/FUL		OFFICER: Mr Ben Warren	
DATE REGISTERED: 24th December 2020		DATE OF EXPIRY: 18th February 2021	
DATE VALIDATED: 24th December 2020		DATE OF SITE VISIT:	
WARD: Leckhampton		PARISH: Leckhampton With Warden Hill	
APPLICANT:	Ms R Tuffy		
AGENT:	Ralph Guilor Architects Ltd		
LOCATION:	Villa Nova Undercliff Terrace Cheltenham		
PROPOSAL:	Demolition of existing dwelling, garage and shed and erection of replacement dwelling and additional new dwelling with garaging		

RECOMMENDATION: Permit



This site map is for reference purposes only. OS Crown Copyright. All rights reserved Cheltenham Borough Council 100024384 2007

1. DESCRIPTION OF SITE AND PROPOSAL

- 1.1 The application site relates to a detached property located on Undercliff Terrace, which is a private road accessed from Old Bath Road. The site is located within Cheltenham's PUA (Principle Urban Area) and abuts Leckhampton Hill which is within the Cotswolds AONB (Area of Outstanding Natural Beauty).
- 1.2 The applicant is seeking planning permission for the demolition of the existing dwelling, associated garage and shed, the erection of a replacement dwelling and the erection of an additional detached dwelling.
- 1.3 The application site was recently granted permission in principle under application number 20/00605/PIP, which gave consent in principle for an additional dwelling on this site (Stage 1). This application now forms stage 2 of this process, which considers the technical and relevant design details of the development.
- 1.4 The application is at planning committee at the request of Councillor Horwood, who initially raised concerns regarding access, flooding and land ownership. Whilst some matters have been resolved, the request remains due to Councillor Harwood's concerns regarding access. An objection from the Parish Council has also been received.

2. CONSTRAINTS AND RELEVANT PLANNING HISTORY

Constraints:

Airport Safeguarding All Developments
Principal Urban Area

Relevant Planning History:

05/00815/OUT 25th July 2005 PER
Erection of a two storey dwelling house

20/00605/PIP 13th May 2020 GRANT

Permission in principle application for construction of 1 no residential dwelling (Land at Villa Nova)

3. POLICIES AND GUIDANCE

National Planning Policy Framework

Section 2 Achieving sustainable development

Section 4 Decision-making

Section 5 Delivering a sufficient supply of homes

Section 11 Making effective use of land

Section 12 Achieving well-designed places

Section 14 Meeting the challenge of climate change, flooding and coastal change

Section 15 Conserving and enhancing the natural environment

Adopted Cheltenham Plan Policies

D1 Design

SL1 Safe and Sustainable Living

L1 Landscape and Setting

GI2 Protection and replacement of trees

GI3 Trees and Development

Adopted Joint Core Strategy Policies

SD3 Sustainable Design and Construction
SD4 Design Requirements
SD6 Landscape
SD7 The Cotswolds Area of Outstanding Natural Beauty
SD9 Biodiversity and Geodiversity
SD10 Residential Development
SD14 Health and Environmental Quality
INF1 Transport Network
INF2 Flood Risk Management

Supplementary Planning Guidance/Documents

Development on garden land and infill sites in Cheltenham (2009)
The Cotswold AONB Management Plan

4. CONSULTATIONS

Tree Officer

25th January 2021

It appears as though most of the vegetation from within this site has now been removed. As such there is no objection to this application.

Any permission must include a Condition that a full BS5837 (2012) Tree Protection Plan should be submitted and agreed prior to any other work (including demolition) being started. There is a good quality (though small) paper-barked maple to the rear of the existing Villa Nova. Attempts should be made to retain this tree.

Similarly, in that much vegetation has already been removed, it would be appropriate if this was mitigated against with new soft landscaping proposals.

6th April 2021

The CBC Tree Section has no new concerns regarding this application.

However as before, an appropriate Tree Protection Plan should be submitted subsequent to any permission to be granted. This should protect trees to be retained prior to any demolition or construction.

Whilst a landscape plan has been submitted, the proposed Hamamelis (witch hazel) is an acid soil loving plant and it is not anticipated that such a plant will thrive at this location.

This needs to be altered. Similarly, the areas adjacent to the parking area appear somewhat sparse and as such these areas should contain a mix soft landscaping (eg hedge/trees/shrubs) in this area.

Publica Drainage And Flooding

19th February 2021

Comments available to view on line.

19th April 2021

Following my site visit last week please see below my comments.

With regards to the existing watercourse I have not seen any evidence of changes being made to the watercourse which in its current state consists of an old concrete channel for the most part and this application has the opportunity to enhance the watercourse through renaturalisation of the channel. It has been confirmed that plot 2 will be at least 5m from the watercourse and access to it will be kept for future maintenance.

In terms of flood risk, a split floor is proposed with the levels at the front to match those of the existing property and the levels at the rear to be 450mm above the existing ground level. This along with the proposed flood resilient construction features including solid concrete floors and lime based plasters will create flood resilient and resistant properties.

As such, I can confirm that we have no objection to the above application on flood risk grounds.

With regards to surface water drainage the proposed strategy will ensure discharge to the watercourse will be no more than the greenfield runoff rate which is likely to be reduced from the existing rate. We will however, require full construction details and pipe sizes which we would be happy to be addressed through the below pre-commencement condition.

CONDITION TO BE ATTACHED:

That, prior to commencement of the development, a full surface water drainage scheme shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include details of the size, position and construction of the drainage scheme, and results of soakage tests carried out at the site to demonstrate the infiltration rate. Three tests should be carried out for each soakage pit as per BRE 365, with the lowest infiltration rate (expressed in m/s) used for design. The development shall be carried out in accordance with the approved details prior to the first occupation of the development hereby approved.

REASON: To ensure the proper provision for surface water drainage and/ or to ensure flooding is not exacerbated in the locality (The Cheltenham Strategic Flood Risk Assessment, National Planning Policy Framework and Planning Practice Guidance). If the scope of surface water drainage is not agreed before works commence, it could affect either the approved layout or completed works.

In these cases the following notes should also be added to the decision notice:

NOTE TO APPLICANT:

The Surface Water Drainage scheme should, where possible, incorporate Sustainable Drainage Techniques in order to ensure compliance with;

- Flood and Water Management Act 2010 (Part 1 - Clause 27 (1))
- Code for sustainable homes - A step-change in sustainable home building practice
- The local flood risk management strategy published by Gloucestershire County Council, as per the Flood and Water Management Act 2010 (Part 1 - Clause 9 (1))
- CIRIA C753 SuDS Manual 2015.

7th May 2021

Following the submission of the revised plans I can confirm that all matters relating to surface water drainage and flood risk have been addressed. Please see below compliance condition.

CONDITION: The development shall be carried out in accordance with the approved drainage details prior to the first occupation of the development hereby approved.

REASON: To ensure the proper provision for surface water drainage and/or to ensure flooding is not exacerbated in the locality (National Planning Policy Framework and Planning Practice Guidance).

Gloucestershire Centre For Environmental Records

17th January 2021

Biodiversity report available to view on line.

GCC Highways Planning Liaison Officer

27th January 2021

Gloucestershire County Council, the Highway Authority acting in its role as Statutory Consultee has undertaken a full assessment of this planning application. Based on the appraisal of the development proposals the Highways Development Management Manager on behalf of the County Council, under Article 18 of the Town and Country Planning (Development Management Procedure)(England) Order, 2015 has no objection subject to conditions.

The Highway Authority has undertaken a robust assessment of the planning application. 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. There are no justifiable grounds on which an objection could be maintained.

Conditions

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any Order revoking and/or re-enacting that Order) the garage/car parking space(s) hereby permitted shall be retained as such and shall not be used for any purpose other than the garaging of private motor vehicles associated with the residential occupation of the property and ancillary domestic storage without the grant of further specific planning permission from the Local Planning Authority.

Reason: To retain garage/car space for parking purposes.

The development hereby permitted shall not be first occupied until the proposed dwellings have been fitted with an electric vehicle charging point. The charging points shall comply with BS EN 62196 Mode 3 or 4 charging and BS EN 61851 and Manual for Gloucestershire Streets. The electric vehicle charging points shall be retained for the lifetime of the development unless they need to be replaced in which case the replacement charging points shall be of the same specification or a higher specification in terms of charging performance.

Reason: To promote sustainable travel and healthy communities.

Notwithstanding the plans submitted, details of the cycle parking facilities shall be submitted to and approved in writing by the Local Planning Authority, and thereafter maintained for the duration of the development.

Reason: To design facilities located close to primary access points to buildings and no further away than the car parking space is to the front door.

Informatives

The Local Highway Authority has no objection to the above subject to the applicant obtaining a section 184 licence. The construction of a new access will require the extension of a verge and/or footway crossing from the carriageway under the Highways Act 1980 - Section 184 and the Applicant is required to obtain the permission of Gloucestershire Highways on 08000 514 514 or highways@gloucestershire.gov.uk before commencing any works on the highway.

Architects Panel

11th February 2021

Design Concept

The panel debated whether there was a good case for demolishing the existing dwelling on this site. Although not listed or of special architectural merit, Villa Nova is the end run of three similar dwellings that are not unattractive and collectively set the scale and character of Undercliffe Terrace. However, the existing building is in a poor state of repair so replacing it with a quality new building makes economic sense.

Being on the end of the cul-de-sac, the site is bigger than its neighbours and there could well be a case for building another dwelling in the garden. However, the garden is in a prominent position on the edge of the AONB and any building on the site will need to be of high quality design taking into account the site's unique setting.

Replacing the existing dwelling with something of similar size and scale wouldn't be a problem. However, increasing the development on the site, either an extra dwelling or bigger replacement, needs to be justified in response to its setting.

The application makes no reference to the trees on site that would have to be felled and a tree report should be provided to justify their loss and any required mitigation proposals.

Design Detail

Notwithstanding the above, the panel did not like the new house designs: they are lumpy, too tall, and out of character with other properties in the street.

Recommendation

Not supported.

Cotswold Conservation Board

26th February 2021

Thank you for consulting the Cotswolds Conservation Board ('the Board') on this proposed development, which would be located in the setting of the Cotswolds National Landscape.¹

In reaching its planning decision, the local planning authority (LPA) has a statutory duty to have regard to the purpose of conserving and enhancing the natural beauty of the National Landscape.² The Board recommends that, in fulfilling this 'duty of regard', the LPA should: (i) ensure that planning decisions are consistent with relevant national and local planning policy and guidance; and (ii) take into account the following Board publications:

- Cotswolds Area of Outstanding Natural Beauty (AONB) Management Plan 2018-2023 ([link](#));
- Cotswolds AONB Landscape Character Assessment ([link](#)) particularly, in this instance, with regards to Landscape Character Type (LCT) 2 (Escarpment);
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)) particularly, in this instance, with regards to LCT 2 ([link](#)), including Section 2.1;
- Cotswolds AONB Local Distinctiveness and Landscape Change ([link](#));
- Cotswolds Conservation Board Position Statements ([link](#)) particularly, in this instance, with regards to the Position Statement on Development in the Setting of the Cotswolds AONB ([link](#)).

The Board will not be providing a more comprehensive response on this occasion. This does not imply either support for, or an objection to, the proposed development.

NOTES:

1) Cotswolds National Landscape is the new name for the Cotswolds Areas of Outstanding Natural Beauty (AONB). The new name takes forward one of the proposals of the Government-commissioned 'Landscapes Review' to rename AONBs as 'National Landscapes'. This change reflects the national importance of AONBs and the fact that they are safeguarded, in the national interest, for nature, people, business and culture.

2) Section 85 of the Countryside and Rights of Way Act 2000. (Link).

Building Control

7th January 2021

The application will require Building Regulations approval. Please contact Cheltenham and Tewkesbury Building Control on 01242 264321 for further information.

Parish Council

25th January 2021

Comments from Leckhampton with Warden Hill Parish Council

The Parish Council objects to this application for the following reasons:

1. The application fails to consider the substantial watercourse that flows down through Plot 2. The application needs to include a professional flood risk assessment including the 40% margin for climate change and a plan for rerouting the watercourse safely.
2. The proposed dwellings are too large for the size of site and when compared with the size of existing houses in Undercliff Terrace.
3. The site borders the AONB and the application fails to adequately address the landscape and environmental constraints.
4. There appears to be uncertainty over the precise boundary of the site and this needs clarification.
5. Because there is no scope for on-road parking on Undercliff Terrace, the proposed dwellings need sufficient off-road parking. The proposed dwelling on Plot 1 does not provide sufficient depth of off-road parking to avoid longer vehicles such as vans extending onto the road. In the case of Plot 2 the situation is unclear because of uncertainty over the precise boundary between the road and the site.

1. Risk of flooding:

From the OS 1:25000 map the stream flowing through Plot 2 appears to have a catchment area of about 6 ha on the land below Daisy Bank Road including parts of gardens as well as the open space. We understand that there is also a drainage pipe emptying into the catchment that carries drainage water from higher up the Hill. Additionally, in heavy storm water flowing down from the Hill onto Daisy Bank Road may then flow down into the catchment at the point where the public footpath crosses the road and there is no curb. The catchment is steep and torrential rainfall of 30 to 60 mm occurs every few years on the Hill with rainfall rates of 40 mm in an hour. This produces high flash flows in which the stream overflows where it descends down to Plot 2 through the garden of the property (Raymella) immediately above. The ground floor of the proposed dwelling on Plot 2 is shown on the application as being flush with ground level. So there would be serious risk of internal flooding unless the overflowing stream from Raymella can be fully captured. The watercourse also needs to be rerouted in a way that does not increase the risk of flooding to properties further down the Hill in Old Bath Road and Pilford Road.

2. Size of dwellings

In its response on the earlier outline application for Permission in Principle, the Parish Council said that 'the Council does not object to this application in principle provided the dwelling proposed in the full application is of a small size appropriate to the available site area of around 0.045 ha and provided that it is of a height and style similar to that of the existing properties in Undercliff Terrace and can be adequately screened by existing trees from view from the immediately adjacent AONB.' In contrast the dwellings as now proposed are very large and each 30% wider than the existing properties. Their roofs are also substantially higher aligning with the top of the chimneys of the existing properties rather than with their roof line.

3. Environmental and landscape impact

In answer to question 10 on the application form the applicants say that there are no trees or hedges adjacent to the proposed development site that might be important as part of the local landscape character. This is not correct. The site boundary borders the AONB and views into and out of the AONB are protected in the AONB Management Plan which has statutory authority and is in turn referenced in the JCS and Cheltenham Local Plan. The boundary vegetation is an important habitat and the PIP biodiversity report mentions common frogs, grass snakes, song thrush, dunnocks, mistle thrush and more. There is a risk that clearing of the site will contravene AONB 29 of the Cheltenham Local Plan on biodiversity.

4. Boundaries of the site

There appears to be disparity between the site details in the current application and in the PIP application. Neighbours say that previous residents of Villa Nova informally subsumed into their garden some adjacent land and they also allowed their front hedge to overgrow the road creating uncertainty over the actual boundary.

5. Off-road parking.

On-road parking is not possible in Undercliff Terrace because the road is very narrow and because it also provides access to the garages of properties in Undercliff Avenue so that sufficient road width is required for vehicle turning. The application includes off-road parking for three vehicles for each of the two properties - one vehicle in the garage and two vehicles on the drive. However for Plot 1 the length of the drive is too short for a longer vehicle without protruding onto the road. For Plot 2 the question of the drive length is unclear because of uncertainty over the site boundary.

Cheltenham Civic Society

2nd February 2021

OBJECT

The Civic Society Planning Forum objects to the scale and design of the proposed buildings.

They are heavy and ugly, and out of scale with their neighbours, as can be seen on the street elevation submitted. Possibly this is because the applicant has tried to pack too much in to the design. Ideally, they would complement the ridgelines and gables of their neighbours.

More attention needs to be paid to the planting for this ecologically sensitive site. The generic biodiversity report seems inadequate given its vicinity to an AONB. Some screening is necessary especially where the development abuts the slope down from Leckhampton Common. That said, planting should not be used as a screen for bad design.

There are concerns about the water run off: we would need more information about how this would be managed.

5. PUBLICITY AND REPRESENTATIONS

- 5.1 14 letters were sent to neighbouring properties, 21 letters of representation have been received in response to this neighbour notification process. 18 letters are objections, 2 are neutral comments and 1 is in support of the application.
- 5.2 The concerns received in the letters of objection have been summarised but are not limited to the following points:
- Flood risk and works to the existing watercourse
 - Loss of trees
 - Design
 - Access during construction
 - Parking
 - Impact on natural environment
 - Impact on amenity – visual impact, overbearing impact, loss of privacy
 - Impact on landscape
 - Over development

The letter of support was received in response to the submission of revised plans, this comment supports the revised design.

6. OFFICER COMMENTS

6.1 **Determining Issues**

6.2 The main considerations of this application are the design and layout, impact on neighbouring amenity, parking and highway safety, flooding, impact on trees and impact on the setting of the AONB.

6.3 Officers have undertaken multiple visits to the application site and surrounding area, site photos have been provided and google maps has been used to fully consider the scheme.

6.4 **The site and its context**

6.5 The application site currently accommodates a single two storey dwelling which forms one of three similarly designed properties located to the north of Undercliff Terrace, which is a private no-through road and is accessed from Old Bath Road.

6.6 The existing dwelling is sat in a substantial plot, which until recently was heavily overgrown with vegetation and trees, officers are aware a large amount of this vegetation has now been cleared from the site.

6.7 The application site is surrounded by residential dwellings which vary in scale, form and design. The land slopes down to the rear of the site, therefore properties in Pilford Road to the north are on lower ground. In addition the site shares its eastern boundary with Leckhampton Hill, which is within the Cotswold's AONB.

6.8 **Permission in Principle**

6.9 The principle of an additional dwelling on this site has already been established as acceptable having secured a Permission in Principle under application number

20/00605/PIP. This form of application is an alternative way of obtaining planning permission for housing-led development which separates the consideration of matters of principle for proposed development (stage one) from the technical detail of the development (stage two).

6.10 The permission in principle application established that the site was capable of development for a further dwelling and was therefore granted. The considerations of this application therefore only relate to the relevant design and technical details which are discussed below.

6.11 **Design, layout and impact on the AONB**

6.12 Section 12 of the NPPF refers to achieving well designed spaces and states that planning decisions should ensure that developments are visually attractive as a result of good architecture, layout and appropriate and effective landscaping. Adopted Cheltenham Plan Policy D1 requires new development to adequately reflect principles of urban and architectural design; and to complement and respect neighbouring development and the character of the locality. Furthermore, JCS policy SD4 relates to design and identifies considerations to include context and character, legibility and identity, amenity and space.

6.13 Further detail can also be found in Cheltenham's Supplementary Planning Document – Development on Garden Land and Infill Sites. This document sets out various elements that are considered to create the character of an area and includes grain, type of building, location of buildings, plot widths and building lines.

6.14 Policy SD7 of the JCS states:

'All development proposals in or within the setting of the Cotswolds AONB will be required to conserve and, where appropriate, enhance its landscape, scenic beauty, wildlife, cultural heritage and other special qualities. Proposals will be required to be consistent with the policies set out in the Cotswolds AONB Management Plan.'

Paragraph 172 of the NPPF states:

'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding natural Beauty, which have the highest status of protection in relation to these issues.'

6.15 The proposed dwellings sit comfortably within the plot and are considered to be of an appropriate footprint and scale for the size of the site, this would reflect the general character and pattern of development in the locality.

6.16 Whilst the scale of the dwellings were considered to be acceptable, officers initially raised concerns regarding the proposed design and form of the new dwellings. In particular, officers did not consider the front elevation to be in keeping or sympathetic to the surrounding/adjacent properties. Officers therefore suggested that the design and form of the dwellings were amended to better reflect the form of the properties adjacent to it and also changes to plot 2 to reduce any visual impact from the AONB. Specifically, officers felt that the design should include a front facing gable. The Architects Panel reviewed the application and raised similar issues.

6.17 Revised plans have been submitted which have taken on-board officers comments, whilst the proposed dwellings are clearly modern in design, they reflect the gable characteristic of the existing and neighbouring dwellings. In addition, the eastern roof form of plot 2 has been amended so as to reduce the bulk and visual impact of the dwelling from the adjacent Leckhampton Hill. The revised design and form is now considered to be acceptable. Material details have also been provided, the materials include render, Northcott reclaimed bricks, 'mid grey' powder coated aluminium windows and doors and

grey concrete roof tiles, these are considered to be acceptable materials for the proposed development in this location.

- 6.18 In addition to a change in design and form, officers requested a proposed landscaping plan during the course of the application, this was considered necessary to mitigate the loss of the existing trees and vegetation and also to ensure that the proposed new dwelling/s would not have a harmful impact on views from Leckhampton Hill and the AONB. A proposed landscaping plan has been submitted and reviewed, and is considered to be acceptable.
- 6.19 Officers consider the revised plans in conjunction with the submission of the landscaping plan have reduced any potential harm to the surroundings, and are considered to be of an acceptable scale, form and design.
- 6.20 The development is considered to appropriately conserve the special qualities of the AONB and is therefore compliant with adopted JCS policy SD7. The proposal is also considered to accord with the Cotswolds Conservation Board adopted position statements relating to 'Tranquillity', specifically relating to policy CE4. The addition of one new dwelling on this site is not considered to result in unacceptable noise pollution or other visual disturbances.
- 6.21 Impact on neighbouring property**
- 6.22 It is necessary to consider the impact of development on neighbouring amenity. JCS Policy SD14 and Cheltenham Plan Policy SL1 state how development should not cause unacceptable harm to the amenity of neighbouring properties. Matters such as a potential loss of light, loss of privacy, loss of outlook, noise disturbances and overbearing impact will therefore be considered.
- 6.23 In terms of light, the only neighbour that could be affected by this proposed development is the adjacent land user at Hildewell. The replacement dwelling in plot one is of a similar scale, overall height and in a similar position within the plot to that of the existing dwelling, officers therefore do not consider that the development will result in any unacceptable loss of light to this or any other neighbouring land user.
- 6.24 Officers acknowledge that the additional dwelling on the site will be visible from the surrounding properties in both Undercliff Terrace and Pilford Road, however, given the distances from these properties, the additional dwelling is not considered to result in any unacceptable visual impact or overbearing impact.
- 6.25 In terms of privacy, concerns have been raised from the residents to the rear of the site in Pilford Road, regarding a loss of privacy as a result of upper floor windows. Whilst these concerns are duly noted, these windows achieve a minimum distance to the rear boundary of approximately 15 metres, which is greater than the minimum distance of 10.5 metres that is considered to be acceptable. The proposed development is therefore not considered to result in any unacceptable loss of privacy to any neighbouring land user.
- 6.26 Due to the constrained nature of the access road that serves the application site and the surrounding residential properties, as well as concerns raised by local residents regarding the construction phase of the project, details of a construction management plan and an asbestos survey and report have been submitted by the applicant. The council's Environmental Health team have reviewed this information and are happy with the details provided. A condition has therefore been added to ensure the works are carried out in accordance with those details.
- 6.27 The proposal is considered to be compliant with adopted Cheltenham Plan policy SL1 and adopted JCS policy SD14 in terms of protecting neighbouring amenity.

6.28 Access and highway issues

- 6.29 Gloucester County Council's Highways department have reviewed the application and their detailed comments can be read above. No objection is raised to the application subject to a number of conditions. The conditions are considered necessary and have therefore been attached.
- 6.30 With regards to parking, the application proposes one integral garage parking space and two further off street parking spaces per dwelling. Cheltenham Borough Council does not currently have any minimum parking standards, therefore the provision of 3 car parking spaces per dwelling is more than appropriate and acceptable for this development.
- 6.31 Local residents and Councillor Horwood have questioned the potential encroachment of this development on to the private access road of Undercliff Terrace. Furthermore, it has been suggested that the proposed development will restrict access for other residents in the road. Officers have reviewed the details and are content that the proposed works are within the red line and therefore within the applicants ownership. Further information and details from the applicants agent provided on the 6th May 2021 suggests that the clearing of the sites overgrown vegetation, which was overhanging the highway, has shown that the development will in fact increase the width of the access road and ensure that access to the application site and surrounding dwellings is suitably maintained, if not improved.
- 6.32 The proposed development is considered to be compliant with Adopted JCS policy INF1 and will not result in any highway safety implications.

6.33 Flooding

- 6.34 The application site is not located within flood zone 2 or 3, however a watercourse runs through the eastern section of the site, the exact location of this watercourse has only been determined following the clearing of the site. Local residents and Councillor Horwood raised concerns that alterations were taking place to the position of this existing watercourse and were therefore concerned about the implications this may have on flooding of local properties.
- 6.35 Officers have liaised with the councils flooding consultant, who have reviewed the application and provided detailed comments. The consultant confirms that there is no evidence to suggest the position of the watercourse has been changed and no objection has been raised to the application. Initially a condition was suggested which required the submission of a surface water drainage scheme to be submitted. However, these details have been received within a revised Flood Risk Assessment received on 18th March 2021 and in the revised proposed site plan. The wording of the condition has therefore been amended with the agreement of the agent and flooding consultant.
- 6.36 Officers duly note the further comment within the Parish Council objection relating to the need for a 40% margin for climate change, however Cheltenham Borough Council does not currently have an adopted policy that would require such measures to be implemented. All other matters around flooding have been considered and addressed above.
- 6.37 The proposal is not considered to result in any unacceptable flooding or surface water run off implications and is therefore considered to be compliant with adopted JCS policy INF2.

6.38 Trees

- 6.39 Until recently the site appeared to have had extensive tree and vegetation cover, with the site being particularly overgrown. It is clear that a number of trees and vegetation have been removed from the site at the time this application was submitted. The removal of

these existing trees and vegetation is unfortunate, however, given that none of these trees were protected; their removal did not require consent.

6.40 The council's tree officer has raised no objection to the application but suggested a change in species for some of the new planting, and also highlighted a lack of planting in the areas adjacent to the parking areas. The applicant has addressed these comments and has submitted a revised plan that proposes an alternative species and has increased the level of planting. The proposed tree planting and landscaping plan is now considered to be acceptable.

6.41 A condition regarding a tree protection plan has been suggested by the tree officer, however, given that the trees have already been removed, officers do not consider that a tree protection plan is necessary in this instance. Instead, officers have suggested a condition which will require the implementation of the proposed landscaping plan.

6.42 **Environmental Impact**

6.43 Records show that important species have been sighted near the application site in the past, however none of these identified species fall within the protected species category. The loss of existing trees and vegetation is unfortunate for wildlife, however the proposed planting within the landscaping plan will mitigate any environmental loss as a result of the site clearance.

6.44 **Other considerations**

6.45 A number of comments have been raised regarding the accuracy of the plans and the extent of the site boundary, officers have worked with the applicant's agent and are happy that the latest plans accurately represent what is within the applicant's ownership.

6.46 *Public Sector Equalities Duty (PSED)*

As set out in the Equalities Act 2010, all public bodies, in discharging their functions must have "due regard" to this duty. There are three main aims:

- Removing or minimising disadvantages suffered by people due to their protected characteristics;
- Taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people; and
- Encouraging people with certain protected characteristics to participate in public life or in other activities where participation is disproportionately low.

Whilst there is no absolute requirement to fully remove any disadvantage, the duty is to have "regard to" and remove OR minimise disadvantage and in considering the merits of this planning application the planning authority has taken into consideration the requirements of the PSED.

7. CONCLUSION AND RECOMMENDATION

7.1 Whilst officers appreciate the sensitive location of this site, having considered the conclusions for each of the topic areas above, which include principle, design, layout, impact on the AONB, impact on neighbouring amenity, highway safety and access, impact on protected species, the harm is not considered to significantly and demonstrably outweigh the benefits of providing a further dwelling.

- 7.2 Officer recommendation is therefore to permit the application, subject to the conditions set out below;

8. CONDITIONS / INFORMATIVES

- 1 The planning permission hereby granted shall be begun not later than the expiration of three years from the date of this decision.

Reason: To accord with the provisions 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 planning permission hereby granted shall be carried out in accordance with the approved plans listed in Schedule 1 of this decision notice.

Reason: For the avoidance of doubt and in the interests of proper planning.

- 3 Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any Order revoking and/or re-enacting that Order) the garage/car parking space(s) hereby permitted shall be retained as such and shall not be used for any purpose other than the garaging of private motor vehicles associated with the residential occupation of the property and ancillary domestic storage without the grant of further specific planning permission from the Local Planning Authority.

Reason: In the interest of highway and pedestrian safety, and to ensure vehicles are able to pull clear of the adopted highway and avoid becoming an obstruction to oncoming traffic, in accordance with Adopted JCS policy INF1.

- 4 The development hereby permitted shall not be first occupied until the proposed dwellings have been fitted with an electric vehicle charging point. The charging point shall comply with BS EN 62196 Mode 3 or 4 charging and BS EN 61851 and Manual for Gloucestershire Streets. The electric vehicle charging points shall be retained for the lifetime of the development unless they need to be replaced in which case the replacement charging points shall be of the same specification or a higher specification in terms of charging performance.

Reason: To promote sustainable travel and healthy communities in accordance with adopted JCS policies SD3 and INF1.

- 5 The development hereby permitted shall not be occupied until cycle storage facilities for a minimum of 2no. bicycles have been made available for use and those facilities shall be maintained for the duration of the development.

Reason: To ensure the provision and availability of adequate cycle parking, in accordance with adopted JCS policies SD3 and INF1.

- 6 Prior to occupation of the dwellings hereby approved, all hard and/or soft landscaping works shall be carried out in accordance with drawing number 2018 100 REV F, unless otherwise agreed in writing by the Local Planning Authority.

Any trees or plants indicated on the approved scheme which, within a period of five years from the date of planting, die, are removed or become seriously damaged, diseased or dying shall be replaced during the next planting season with other trees or plants of a location, species and size which shall be first agreed in writing by the Local Planning Authority.

Reason: In the interests of the character and appearance of the area, having regard to adopted policies D1, G12 and G13 of the Cheltenham Plan (2020), and adopted policies SD4 and INF3 of the Joint Core Strategy (2017). Approval is required upfront because the landscaping is an integral part of the development and its acceptability.

- 7 Prior to the first occupation of the development hereby approved, the development shall be carried out in accordance with the approved drainage details set out in the Flood Risk Assessment and SUDs Strategy received on 18th March 2021.

Reason: To ensure the proper provision for surface water drainage and/ or to ensure flooding is not exacerbated in the locality (The Cheltenham Strategic Flood Risk Assessment, National Planning Policy Framework and Planning Practice Guidance), in accordance with adopted JCS policy INF2.

- 8 The development shall be carried out in accordance with the details contained within the construction method statement, accompanying method statement site plan and Asbestos survey and report received on 7th May 2021.

Reason: To prevent a loss of amenity affecting surrounding occupiers due to noise and nuisance from construction works, in accordance with adopted Cheltenham Plan policy SL1 and Adopted JCS policy SD14.

- 9 Notwithstanding the provisions of The Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order revoking and/or re-enacting that order), the first floor side elevation window in plot 1 (serving Bed 1) shall at all times be non-opening and glazed with obscure glass to at least Pilkington Level 3 (or equivalent).

Reason: To safeguard the amenities of adjacent properties, having regard to adopted policy SL1 of the Cheltenham Plan (2020) and adopted policy SD14 of the Joint Core Strategy (2017).

INFORMATIVES

- 1 In accordance with the requirements of The Town and Country Planning (Development Management Procedure) (England) Order 2015 and the provisions of the NPPF, the Local Planning Authority adopts a positive and proactive approach to dealing with planning applications and where possible, will seek solutions to any problems that arise when dealing with a planning application with the aim of fostering the delivery of sustainable development.

At the heart of this positive and proactive approach is the authority's pre-application advice service for all types of development. Further to this however, the authority publishes guidance on the Council's website on how to submit planning applications and provides full and up-to-date information in relation to planning applications to enable the applicant, and other interested parties, to track progress.

In this instance, the authority sought revisions to address various matters such as design, layout, flooding landscaping;

Following these negotiations, the application now constitutes sustainable development and has therefore been approved in a timely manner.

- 2 The construction of a new access will require the extension of a verge and/or footway crossing from the carriageway under the Highways Act 1980 - Section 184 and the

Page 22

Applicant is required to obtain the permission of Gloucestershire Highways on 08000 514 514 or highways@gloucestershire.gov.uk before commencing any works on the highway.

- 3 The application will require Building Regulations approval. Please contact Cheltenham and Tewkesbury borough council on 01242 264321 for further information.
- 4 The Surface Water Drainage scheme should, where possible, incorporate Sustainable Drainage Techniques in order to ensure compliance with;
 - Flood and Water Management Act 2010 (Part 1 - Clause 27 (1))
 - Code for sustainable homes - A step-change in sustainable home building practice
 - The local flood risk management strategy published by Gloucestershire County Council, as per the Flood and Water Management Act 2010 (Part 1 - Clause 9 (1))
 - CIRIA C753 SuDS Manual 2015

APPLICATION NO: 20/02296/FUL	OFFICER: Mr Ben Warren
DATE REGISTERED: 24th December 2020	DATE OF EXPIRY : 18th February 2021
WARD: Leckhampton	PARISH: LECKH
APPLICANT:	Ms R Tuffy
LOCATION:	Villa Nova, Undercliff Terrace, Cheltenham
PROPOSAL:	Demolition of existing dwelling, garage and shed and erection of replacement dwelling and additional new dwelling with garaging

REPRESENTATIONS

Number of contributors	21
Number of objections	18
Number of representations	2
Number of supporting	1

7 Pilford Road
Cheltenham
Gloucestershire
GL53 9AG

Comments: 13th January 2021

The stream at the end of garden comes from the stream at Villa Nova and we are concerned with the risk of flooding due to the builders diverting the stream. Over the last couple of months the stream has flooded more regularly which is a cause for concern.

15 Pilford Road
Cheltenham
Gloucestershire
GL53 9AG

Comments: 26th January 2021

you might also be interested in some observations made by a chum who's a town planner with a large developer. I hope they might be useful as they certainly echo our own views:

When did they fell the trees? Under Riparian Rights, they should not be diverting the watercourse, which might inadvertently affect the flow of water downstream that others have right to receive.

There will need to be a boundary treatment; the council will at least insist on 1.8m high closeboard fencing as a minimum. A species rich hedge too would provide biodiversity net gain.

If the track to the house is private do they have rights to plug in another house? That's not a planning matter as it's up to them if they can't actually legally access in the end.

Also, that's not a biodiversity report and there should be an arboricultural report to accompany the application (if there are any trees now left!). I would complain about not

Page 24

allowing due process to be followed as it's possible that, had they been good examples, neighbours could have asked for a TPO etc but, as they've been hacked down, it's not now even possible to consider. Total lack of disregard for our planning system, democracy and hard-working planning officers.

Only just looking at the plans - I see they are proposing living rooms at first floor with HUGE floor to ceiling windows - no, no, no!!! Also, they're missing a Block Plan.

Finally, it's not in keeping with the Victorian and arts and crafts style feeling round there. There's nothing in the design that references the surrounding built or natural environment; it's just maximising square footage. The very fact they are both exactly the same demonstrates they do not individually respond to the plots position within an established residential street.

Comments: 23rd January 2021

We strongly object to any attempt to disrupt the ancient watercourse known, amongst other names, as the Pilley Brook. In any case, the Riparian Rights/Responsibilities of the land owners of Villa Nova forbid disruption, alteration or use of the watercourse across their land. So it's a matter of great concern that, if true, their application seeks to mislead you about the course of the Pilley Brook, with obvious implications about a future negative impact on flood risks in our immediate downstream neighbourhood.

An additional concern is that such a major building project relies on site access for plant and machinery along a narrow private road, with an inevitable risk of disruption to traffic on Leckhampton Hill, a major road link to Gloucester, Cirencester and Swindon.

1 Pilford Road
Cheltenham
Gloucestershire
GL53 9AG

Comments: 26th January 2021

I am writing to raise concerns and objections about the planning application and development that is already underway at the site of Villa Nova, Undercliff Terrace, Cheltenham.

There is a stream that flows near the site and continues through our back garden. I am concerned there is an increased flood risk from the villa nova development as they have already cleared the site and cut down several very large trees even before their planning application has been approved. The developers have also been seen digging trenches in the adjacent field to divert the water impacting on our road (Pilford Road). Following this activity ours and several of our neighbours gardens flooded quite badly and much more than normal in the recent rainy whether.

Moreover non of us in Pilford Road have received a consultation letter about the proposed development which seems wrong as we will be directly impacted by it. Why did we not receive a letter from you about this planning application? And Will your planning office inspect the site ASAP to check they are not going ahead with developing the site until they have been through the proper planning processes.

I look forward to your response as soon as possible.

3 Undercliff Avenue
Cheltenham
Gloucestershire
GL53 9AB

Comments: 6th April 2021

We are pleased to see the proposed development is now in keeping with those existing properties in the road, however we remain concerned about the parking and the risk of flooding. It appears the new development encroaches into the lane in order to create a deep enough driveway to accommodate the length of a car. As mentioned previously there is no room in the lane to park so more space is needed within the development site. Of the 6 spaces recorded on the application, 2 are within the garages, it's unlikely these will be used for parking.

26 Pilford Road
Cheltenham
Gloucestershire
GL53 9AQ

Comments: 25th January 2021

I am objecting to the planning application on the grounds of both its impact on the natural environment and local amenity.

The application has completely disregarded the watercourse running through the site or the natural springs along the boundary fence and in the adjacent field. Given that one of the proposed buildings appears to sit on top of the existing watercourse, I assume there are plans to divert the stream. Any work to the stream or the ground around the natural spring line will impact the flow of water and, understandably, a number of properties downstream have raised objections and concerns due to the risk of flooding. Concerns I share with them. It is disappointing to see that significant groundworks and clearance of vegetation have already begun. Vegetation that would help soak up water and stabilise the ground.

The proposed application will also have a significant visual impact, directly bordering the daisybank fields. The proposed dwellings are both imposing and overbearing and will impact on the local landscape and privacy for neighbouring properties.

Whilst I do not propose in principal to the construction of a new property, the proposal to squeeze in two 3 storey properties right up to the boundary line (and on top of an existing watercourse) does not seem appropriate for the site.

15 Fairfield Avenue
Cheltenham
Gloucestershire
GL53 7PN

Comments: 22nd January 2021

We strongly object to any attempt to disrupt the ancient watercourse known, amongst other names, as the Pilley Brook. In any case, the Riparian Rights/Responsibilities of the land owners of Villa Nova forbid disruption, alteration or use of the watercourse across their land. So it's a matter of great concern that, if true, this application seeks to mislead about the course of the Pilley Brook, with obvious implications about a future negative impact on flood risks in our immediate downstream neighbourhood.

An additional concern is that such a major building project relies on site access for plant and machinery along a narrow private road, with an inevitable risk of disruption to traffic on Leckhampton Hill, a major road link to Gloucester, Cirencester and Swindon.

Raymella
Undercliff Avenue
Cheltenham
Gloucestershire
GL53 9AB

Comments: 22nd January 2021
Letter attached.

Comments: 10th March 2021
Letter attached.

5 Undercliff Avenue
Cheltenham
Gloucestershire
GL53 9AB

Comments: 23rd January 2021

The PIP was granted by the Parish Council on the basis that the new build was 'of small size' and 'of a height and style similar to that of the existing properties in Undercliff Terrace'.

The proposed 2 new houses clearly do not fit that description. However the style presented does have the redeeming features of few windows on the south side, reducing loss of privacy, and hipped roofs which mitigate the larger aspect of the houses.

The finished height, which is crucial to acceptability is difficult to ascertain from the very basic drawings on the CBC website, however I am assured by Mr Guilor, the agent/architect for the project, that the ridge height of the building replacing Villa Nova will be within 200mm of the ridge height of the existing building which is itself similar to it's neighbour Hildewell. I should like to see confirmation of this.

We share neighbours concerns over the implications of six more cars using this narrow lane ie doubling current regular usage. The lane gives on to the pavement of Old Bath Road with no warning signs to either vehicles or pedestrians.

Eventual reinstatement of the surface must be a condition of planning.

We would also take this opportunity to ask that any exterior lighting is subdued and downward facing, there is no street lighting close by and with little light pollution there is currently an abundance of nocturnal wildlife eg foxes and owls. We would like this to continue.

4 Undercliff Avenue
Cheltenham
Gloucestershire
GL53 9AB

Comments: 24th January 2021

Further to the above planning application, I would like to make the following comments and concerns:

- The proposed roofs of the new homes are not the same height as the existing properties in Undercliff Terrace as per Permission in Principle (April 20). On the application they are shown to be level with the top of existing chimneys which, it would appear, have been increased in height to suit the proposed plans.
- The existing boundary defining Undercliff Terrace is not shown on the Proposed Site Plan but drawn as 'hedge/area overgrown'. The boundary should be a straight line from existing dwellings (Hazelwell & Hildewell) as shown in the Full Site Location Plan submitted (OS Extract).
- An observation is that The Proposed Site Plan (Oct 20) differs in shape from Location Plan (Dec 20) and the Block Plan (April 20).
- Under the Assessment of Flood Risk, (11) on the Application for Planning Permission, the proposal states 'No' to all 3 questions. This needs scrutinising.
- It has been stated that on-site parking spaces will be provided for six cars. Where are all these parking spaces on the plan? Undercliff Terrace is very narrow so 'on road' parking for the new homes would be prohibitive as it would restrict turning off existing drives and general access.
- The Terrace has an unmade road surface and will suffer tremendously with all construction and delivery vehicles required to build two new homes. I would like confirmation that the whole length of Undercliff Terrace will be made good when the project is completed.

Comments: 2nd April 2021

The front boundary of the proposed development is still ambiguous and is not a straight line taken from Hazelwell and Hildewell. This results in reducing the width of the terrace and gives the developer additional land. This could compromise access for existing vehicular access.

3 Undercliff Avenue
Cheltenham
Gloucestershire
GL53 9AB

Comments: 12th January 2021

Whilst we aren't opposed to a fourth property we do object to this planning application for the following reasons:

1. The proposal to demolish Villa Nova and replace with a much larger property, along with an additional similar property totally alters the street setting. Currently there are 3 similar properties, which sit well in the road. By replacing one and adding two much wider properties, the 2 remaining houses are overwhelmed by them. Whilst a personal view I do also think the front of the houses are unattractive and will not enhance the view we have from our property at all

2. Parking. Undercliff Terrace is a single track lane, there is not enough room for cars to pass each other. The application states parking for 6 vehicles, assuming two spaces are garage spaces. Plot 1 doesn't look like the frontage has enough depth to park a family sized car, and is it really wide enough for two vehicles to park next to each other? Given these are to be 4+ bedroom homes one can expect 3-4 cars per property. There is no room in the lane to park on the road so they must have enough space to accommodate more cars. Also if the parking space for plot one is not deep enough, any car parked on it will protrude into the road blocking access to the driveways/garages of the properties on Undercliff ave that have rear access onto the terrace.

3. Access during construction. The entrance to the terrace from Bath Rd is narrow, so narrow that the bin lorries do not venture down it. Should construction lorries use the lane there is nowhere for them to turn around once they get to the site. Consideration needs to be given to this.

4. Post development we would like the developer to return the road to the condition it was in, or better than, before work started. The residents of the Terrace and Ave maintain the road and would not wish to fund any repair work needed.

We hope our concerns will be taken into account when making your decision

2 Undercliff Avenue
Cheltenham
Gloucestershire
GL53 9AB

Comments: 20th January 2021

Work has started already despite the planning stage not having been completed.

Undercliff Terrace is much too small for the size of lorries needed for such building. Already I have seen a large lorry coming out with a digger on. It had it's wing mirrors in to avoid the hedges it was so tight. Presumably whilst reversing in it had the mirrors out & didn't worry about the hedges. Is there no minimum width of road for access to building like this?

The building in Undercliff Avenue of two dwellings to replace Imber has already destroyed the road surface. My car has been hit & lightly damaged by a lorry (with no recompense from the builders). These roads are too small for this type of traffic safely. The Terrace is even smaller.

This is a very poor trend on the hill to replace one dwelling with a decent sized garden with two dwelling with miniscule gardens. Increasing the quantity but reducing the quality of the homes on the hill.

Hazelwell
Undercliff Terrace
Cheltenham
Gloucestershire
GL53 9AE

Comments: 22nd February 2021

As a close neighbour of Villa Nova, I would like to make three comments regarding the building plans for two new houses on this site.

Asbestos and Air Pollution

I have been told that the roof tiles of Villa Nova are made of, or contain, asbestos. These may even be the original 1922 tiles, dating back to a time when the dangers of asbestos were not known.

If this is so, then I hope I can safely assume that at least part of the demolition work at Villa Nova will be done by a specialist firm who can ensure that no asbestos dust escapes to create a very nasty health hazard for people who live in nearby properties.

In addition, several of my neighbours, I know, have chronic respiratory conditions. They would be badly affected by any kind of airborne dust pollution arising from demolition work, and I hope measures will be taken to minimise this risk.

Risk of Flooding

The applicant has assured us that at the end of the building work, which will inevitably churn up and damage the road surface of the Terrace, the lane will be made good. This is good news, as the costs of resurfacing the lane would otherwise fall upon those private individuals in Undercliffe Terrace and Avenue who use it for their vehicles.

When this is done, it will be important to take care that the profile and slope of the lane does not, in conditions of heavy rainfall, allow rainwater flow over the lane edge towards the existing houses, Hildewell and Hazelwell. The lane needs to have a "concave camber" to ensure that the surface water runs well away from houses on the downward slope. I hope this will be done.

Subsidence Risk

I did mention to the applicant that some years ago a hole appeared in the surface of the lane just before it reaches the Old Bath Road. When this was investigated, it was found that underneath the thin surface layer was a very large hole, and it was thought that this

had been hollowed out over some years by the action of underground water of some kind.

There was a definite risk that several square yards of the lane could have collapsed under the weight of a car or lorry, though fortunately it was discovered in time. A leaking gas main was also discovered and had to be mended. As there is always a risk of underground water coming off Leckhampton Hill, I would recommend that before any resurfacing is done, this part of the Lane should be tested to make sure the sub-structure is sound.

It may be worth mentioning that in the last period of dry weather I noticed that a spring of some kind has re-appeared some yards further up the lane, from the garden of 368 Old Bath Road. This has happened several times in previous years due to a leaking land drain in that garden. I was told that this drain/ culvert was installed to prevent flooding in houses on the downward slope of the hill (i.e. in the Old Bath Road) and that the Department of the Built Environment has undertaken repairs in the past because of that risk. If there is water on the surface, could there also be water finding its way in the subsoil beneath the lane?

Comments: 31st March 2021

I think the revised design for the two new houses is much more in keeping with Hildewell and Hazelwell, as regards the roof height, roof profile etc. This seems a much more modest and sympathetic design for this particular location.

I do hope the other issues of parking spaces, replacement of trees, privacy for overlooked houses in Pilford Road etc. will be happily resolved.

I strongly believe that the stream (which I believe is called the Pill) should be handled with care and respect, both in regard to the part it plays or could play in flood prevention, and its value or potential value to wildlife.

17 Pilford Road
Cheltenham
Gloucestershire
GL53 9AG

Comments: 24th January 2021

Stream:

There is currently a stream running through the garden of Villa Nova, approximately where the second house is proposed to be sited, which passes through the bottom of my neighbour's garden (19 Pilford Road) then into mine, and continues past all Pilford Road houses (odd numbers). As to what would happen to the stream, it is impossible to know from the submitted planning application as it has not been referenced - rather factually misleading information has been submitted that there is not a watercourse within 20m of the property. I am very concerned that any change could impact the flow of the stream and could increase the risk of flooding for residents downstream. A significant part of the lower garden to Villa Nova allowed some excess water to be absorbed naturally - this will be eliminated if the second property with paving is built. I also do not think that diverting the flow into the adjoining field is an option, as this is already saturated at many times in the year and has been getting worse over the last few years, and the current stream is

quite free-flowing. As such, an environmental impact and assessment of flooding risk I believe must be undertaken, before the course of a flowing body of water is changed.

Privacy:

As the Villa Nova property is already elevated, by means of being further up the hill than the properties on Pilford Road, I believe the proposed design of the rear of the properties, with large floor to ceiling window on the first floor is wholly inappropriate. There will be no privacy for the bungalow and garden in No 19, and less privacy for my property. This is further compounded by the proposed second dwelling being so close to the boundary of number 19. Additionally, the modern design is not in keeping (especially at the rear) with the surrounding houses, which have a period / 'Arts and Craft' country feel - right on the edge of the town and adjoining open fields.

Although the proposed ridge height is approximately the same as the existing property, the roof ridge being changed from perpendicular to parallel with Undercliff Terrace, the rear elevation will dominate the surrounding properties - especially if a second property of such type is added.

19 Pilford Road
Cheltenham
Gloucestershire
GL53 9AG

Comments: 22nd January 2021

I wish to raise the following objections

1) Privacy - The whole of my garden and the rear of my bungalow property has up till now enjoyed substantial privacy as the current property sits to the far right of their total plot looking from the rear. Two much wider and considerably higher properties are now being squashed into this site without much consideration for neighbours. Only 3 windows from Villa Nova currently overlook my bungalow and garden and there will now be no less than 12 windows. There are also a further 4 windows owing to the second level of the proposed properties. For years there has been a 7 metre Laurel tree and a wall of 5 metre bamboo in their garden which kept my garden hidden from view. We were told by the landscapers (who have already started clearing the site) that these would remain. To my absolute horror these were destroyed 2 days ago. Bamboo needs lots of water and the loss of these will increase the volume of water in the stream. I will have absolutely no privacy from these proposed properties and will need at the very least mature evergreen shrubs etc in their place to restore some privacy.

The Stream - I along with other residents have suffered with bad flooding/drainage issues and do not want this to be increased as a result of them looking to divert the stream away from their land in any way.

11 Pilford Road
Cheltenham
Gloucestershire
GL53 9AG

Comments: 13th January 2021

My house is downstream of the stream that runs through the Villa Nova plot. The planning application appears to have ignored and made no provision for the stream. I am concerned about the increased risk of flooding of the portion of the stream through my garden.

5 Pilford Road
Cheltenham
Gloucestershire
GL53 9AG

Comments: 13th January 2021

There is a stream going through this land which is not mentioned in the plans and should NOT be diverted onto Daisy Bank. Pilford Road is at the bottom of Daisy Bank which would increase the risk of flooding.

1 Pilford Road
Cheltenham
Gloucestershire
GL53 9AG

Comments: 11th January 2021

Planning application ignores the constant stream running across the site. The planning application claims there is no watercourse within 20m of the site. This is not factually correct. The builder on site is already diverting the stream and clearing vegetation. None of this is within the planning application. This work outside of the planning application includes digging a new ditch in the Daisybank field and would not appear legal. The unauthorised work could significantly increase flood risk. The same stream runs through my garden (downstream). Flooding in recent months has been unprecedented and significantly worse than the 2007 exceptional flooding. This activity needs urgent investigation and no work should be allowed outside of the planning application. The planning application needs to reference the existing stream.

Comments: 27th January 2021

I must object in the strongest possible terms to this planning application. Urgent investigation is also required around substantial and illegal tree felling and alteration of the course of a stream prior to planning permission being granted.

My concerns are:

- o The planning application makes no reference to a stream that passes through the site. It pretends it doesn't exist. The stream flows consistently through the site all year round.
- o We live a short distance downstream of the stream which has a consistent flow all year round. Work has already commenced to divert the stream into a neighbouring field

Page 33

prior to planning permission being granted and despite the planning application making no mention of the stream.

o There has been no reported flooding of the stream since our property was built in 1929, nor during our tenure since 2005 and even during the 2007 floods. However, in December of 2020 our garden and shed was severely flooded for the first time. There would appear a causal link between this flooding event and the illegal diversion of the stream upstream relating to the work at Villa North. If this work is not stopped and the stream returned to its original course we shall be seeking compensation from Cheltenham Borough Council for flood damage. It is the Council's lack of action that has caused the problem.

o There has been widespread tree felling in and around Villa North which is happening outside of planning approval.

o The proposal is a crass overdevelopment and unsympathetic to the immediate area.

o Despite being directly impacted by the development we have received no notification of the proposals.

How can tree felling and a stream be diverted without planning permission? This makes a mockery of the planning system and local democracy.

White Cottage
Leckhampton Hill
Cheltenham
Gloucestershire

Comments: 20th March 2021

Please find attached objection to the proposed development at Villa Nova and a copy of the recent appeal decision on the site uphill at Imber, Undercliff Avenue referred to in the objection. I would be grateful if these could be uploaded to the case file.

[Letter and appeal decision attached.]

Comments: 7th April 2021

Letter attached.

5 Undercliff Avenue
Cheltenham
Gloucestershire
GL53 9AB

Comments: 17th February 2021

Looking at the revised block plan we are concerned that the front boundary is still showing an incorrect frontage.....- it should be inline with the other properties, taking a straight line from Hazelwell and Hildewell.

Please correct the plan asap

Orchard House
338 Old Bath Road
Cheltenham
Gloucestershire
GL53 9AF

Comments: 24th January 2021

The planning application section 11 states that there is no stream within 20 metres. This is untrue. A simple visual examination of the site will show a stream entering the garden of Villa Nova from a culvert which runs underneath Undercliffe Terrace. The site location plan does not accurately show the watercourse. A conveyance from 1984 clearly shows the watercourse running through the garden of Villa Nova as does Google maps. The stream runs through the garden of our property and represents an important and valuable amenity. It is felt that the planning application completely fails to address the flooding implications of the proposed work. Since site work began we have noticed a marked increase in flow.

346 Old Bath Road
Cheltenham
Gloucestershire
GL53 9AF

Comments: 24th January 2021

I note that that neither the existing nor proposed site plans for the development of Villa Nova, GL53 9AE show in any way the existing water course which enters the plot from Undercliff Terrace and exits into the garden of the property at the end of Pilford Road. This watercourse appears on Land Registry documents.

I also note that the applicant has responded "NO" to the question "Is your proposal within 20 metres of a watercourse (e.g. river, stream or beck)?", which by any stretch of the imagination is being very economical with the truth.

This watercourse flows through at least a dozen properties both up and downstream from Villa Nova and in the more than 20 years of living in this current address, I have never heard it referred to as anything other than a stream. Indeed until a couple of years ago, when a hungry heron had its fill, there was a self-sustaining population of trout living in the stream.

It is essential that this application presents a credible plan for managing this watercourse, without disturbing properties downstream.

From Raymella

Page 35

PLANNING

NOTES

Undercliff Avenue 202 JAN 2021

Dear Sir, in reference to ~~the~~ proposed building at Villa Nova Undercliff Terrace there are a few points we would like considered.

Firstly we would like the boundary line to be kept in line with the existing houses on that side of the terrace.

The previous owner had let his hedge encroach into the lane narrowing

it down. The lane should be left as a country lane as much as possible. We note the application is for 6 vehicles, we doubt there will be enough room for 6 cars.

Our garage is directly opposite and we need to be able to get our car out if we have doctors appointments. The terrace is very narrow and construction lorries are bound to cause access problems the terrace is not built for heavy vehicles, the bin men don't come down because it is so narrow. Should you give the go ahead for this project, we feel all work

vehicles should be parked on Villa Nova land to give all residents access.

Lastly we feel when the building is complete the builder should put the road back in good order. We hope you will kindly consider our concerns.

From

From

Page 36

[REDACTED]
Raymella Undercliff Avenue
Leckhampton
Cheltenham

Reference No. 20/02296/FUL

Dear Sir,

Having looked at the ammended plans for the houses to be built on Villa Nova Undercliff Terrace, we notice the boundary line across the two houses has be altered narrowing the road our garage is opposite and our existing and entering our garage could be compromised, we feel the boundary line should be kept in line with the other two houses.

Yours faithfully
[REDACTED]

PLANNING

Rec'd - 9 MAR 2021

SERVICES

FAO Mr Ben Warren
Planning Case Officer for:

**20/02296/FUL - Villa Nova Undercliff Terrace Cheltenham Gloucestershire
Proposed Demolition of existing dwelling, garage and shed and erection of
replacement dwelling and additional new dwelling with garaging**

I write to add my concerns to those expressed by local residents about the proposed redevelopment of the Villa Nova site on Undercliff Terrace.

Since purchase of the site in December of last year by [REDACTED] the application site has been cleared of much of its vegetation leaving the site and existing dwelling exposed and open to views from the Area of Outstanding Natural Beauty (AONB) immediately to the east - Daisybank Common, common land which is traversed by a number of well used Public Rights of Way (PROW). The clearance has also exposed the true line of the watercourse that runs through the site.

The principle of an additional dwelling on the site has already been accepted by the Council and is acknowledged. However, the current proposal fails to respect the AONB landscape, the proximity of the watercourse and the amenity of neighbouring residents.

The open nature of the adjacent AONB must be respected. The properties proposed are substantial and of much greater scale than the existing property and those properties adjacent to it. The existing property is clearly visible from the AONB and far more dominant than surrounding residential development (see photos below). The proposal to bring development closer to the boundary with the AONB and raise the eaves height by 2.2m (almost a full storey) on the east facing side elevation will make these dwellings much more visible, a dominant and discordant feature as viewed from the AONB and main PROW up through and across the lower sections of Daisybank Common.

It should be noted that views towards the site were previously curtailed by the vegetation that has been removed. The application puts forward no proposals for landscaping/relandscaping the boundary with the AONB to screen views of the proposed new dwellings. The proposed dwellings, at such larger scale, would be a permanent incongruous visual element within the landscape and thus harmful to the character and appearance of the AONB contrary to policies CP7, SD4, SD6, SD7 of the Joint Core Strategy (JCS) and policies CE1 and CE3 of the Cotswolds AONB Management Plan that seek to ensure that development has regard to the scenic qualities of the AONB and its setting.

The importance of the AONB designation in the determination of such applications was highlighted in the recent appeal decision in respect of proposals to build two new houses at Imber, Undercliff Avenue reference APP/B1605/W/19/3241668. This appeal was dismissed in July of last year. A copy of the appeal decision is attached.



Having reviewed the revised documents online it is clear that the proposed development is within 5m of the existing watercourse. The proximity of the watercourse to the existing dwelling and the site of the second dwelling can be readily appreciated from the photo below.



The Flood Risk Engineer, in the consultation response to the Council, states that **‘to allow for future maintenance of the watercourse the dwelling should be a minimum of 5m from the watercourse bank’**. The Flood Risk Engineer concludes that more information is required and has raised objection to the development.

It should be noted that the proposed dwelling closest to the boundary with the AONB is also positioned in very close to the boundary with the rear private garden of the existing dwelling at 19 Pilford Road (See photo below). The minimal distance combined with the elevated position of the proposed development will lead to overlooking and loss of privacy for the occupiers of that dwelling. It should be noted that the main living space to the proposed dwelling is shown to be at first floor level with large expanses of glazing with Juliet balconies facing north towards properties on Pilford Road. Furthermore, at second floor level rear facing bedrooms (including the master bedroom) have roof windows combining both sloping and vertical elements which, as shown in the section drawing submitted, would allow panoramic views over neighbouring residential development.



Above – photo of Villa Nova (as existing) and 19 Pilford Road

The fact that both proposed dwellings will be taller than the existing dwelling and those to the west on Undercliff Terrace should not be ignored. The dropped eaves on the front of the proposed dwellings does help from a streetscene perspective but the additional height will only serve to make these building more prominent in views from outside the site and particularly those gained from the neighbouring AONB.

Whilst it is accepted that the principle of an additional dwelling has been agreed on the site by the approval of a PIP application last year (20/00605/PIP) prior to the sale of the site to the applicant/developer, this does not mean that the current proposals should be subject to any less scrutiny and that the impact on the AONB, the watercourse and neighbouring properties can be ignored.

It seems very clear that the developer is seeking to achieve far too much on the site. The whole scheme should be scaled down and back. Revised plans for two smaller dwellings should be put forward alongside landscaping proposals for successfully mitigating their visual impact on the character and appearance of the AONB.

Yours sincerely


DJ Planning



Appeal Decision

Site visit made on 2 June 2020

by M Allen BSc (Hons) MSc MRTPI

an Inspector appointed by the Secretary of State

Decision date: 13 July 2020

Appeal Ref: APP/B1605/W/19/3241668

Imber, Undercliff Avenue, Leckhampton, Cheltenham, Glos

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Colburn Homes Limited against the decision of Cheltenham Borough Council.
 - The application Ref 19/00011/FUL, dated 2 January 2019, was refused by notice dated 27 June 2019.
 - The development proposed is the construction of 2 No. dwellings.
-

Decision

1. The appeal is dismissed.

Procedural Matter

2. With the appeal the appellant has submitted amended drawings in respect of the site layout, cross-section and landscape strategy. These are to address concerns which the Council has raised in its Delegated Officer Report. The Council has had the opportunity to comment on these details and as such, I am satisfied that there would be no prejudice in me considering these amended details.

Main Issue

3. The main issue is the effect of the proposal on the character and appearance of the area, including on the adjacent Area of Outstanding Natural Beauty.

Reasons

4. The appeal site comprises the existing dwelling, known as Imber, and its associated garden area. Access to the site is gained from Undercliff Avenue to the north, which also serves several other residential properties. Imber sits at one of the highest points within the site and lies above the level of Undercliff Avenue. Within the site, ground levels fall to the east towards a watercourse, beyond which lies a belt of mature trees lying along the eastern extent.
5. The site is bordered on three sides by existing properties, with an open aspect to the south east towards the Cotswolds Area of Outstanding Natural Beauty (the AONB), which borders the site. To the north of Undercliff Avenue dwellings are relatively densely sited with little spacing between. This results in the development on that side of the road having a suburban quality at this location, within the defined Principal Urban Area (PUA) of Cheltenham. Whilst the appeal

site also lies within the PUA it, in my view, sits apart from the development to the north of the road. This is, in part, due to a greater separation between Imber and its immediate neighbour than there is between other dwellings in the area. In addition, the large garden area associated with Imber results in an area of transition between the denser development to the north and the less dense development to the south, as well as the open nature of the adjacent AONB. There is also an increased spaciousness to the layout of development immediately adjoining, and to the south of, the site than to the north.

6. I have had regard to the submitted Landscape Statement but disagree with the conclusion that the site is more strongly influenced by and associated with its urban setting. As I have identified above, the site is a large area of garden associated with a single dwelling, sitting distinctly apart from the denser development to the north. It is therefore in my view a site providing a transition between the more urban development in the area, with that of the open rural aspect of the AONB. As a consequence of this, the site is an attractive element in views out of the AONB and contributes positively to its setting.
7. The proposed scheme would result in the construction of two substantial dwellings alongside Imber. One would be located on a plateau alongside the existing property, with the other beside this at a lower level. Due to the presence of a buffer to the eastern extremity of the site which contains the existing watercourse and mature trees, the proposed dwellings would be located in close proximity to each other. As a consequence, there would be little spacing between, as well as little spacing between the proposed dwelling on Plot 1 and Imber. This would result in the development having a cramped appearance and give the impression of being squeezed into the site, especially when viewed from Undercliff Avenue. It would be an incongruous addition to the streetscene, notwithstanding that the development would take account of the fall in levels within the site.
8. Whilst I have acknowledged that the development to the north side of Undercliff Avenue exhibits a denser layout, these properties are generally smaller, and they are set below the level of the road. The proposed properties are of a greater scale and would be sited in an area which I have identified as being transitional between higher and lower density development. The immediately adjoining development has a roomier appearance, befitting the location adjoining the AONB. As such, the site following development would not assimilate successfully with the character of the built environment with which it would be most closely associated.
9. There are numerous Public Rights of Way (PROWs) which traverse the adjacent AONB. I observed that the appeal site and Imber itself were clearly visible from a number of them and was a feature which provided an attractive framing to the development along Undercliff Avenue. There was also a distinct sense of openness in views towards the site, with dwellings appearing well-spaced and framed by vegetation. Whilst there are views of the more densely developed settlement to the north, these are at a distance. As such, at close quarters the proximity of two large dwellings adjacent to Imber would be a harmful and jarring addition in views from the AONB.
10. Moving to the south along the PROWs, the level of the land rises and, notwithstanding the conclusion of the Landscape Statement, I observed views

of the site were still possible, notwithstanding the presence of vegetation. This vegetation provided some shielding of views to the site however this was not extensive in its effect. I accept that in places these would be glimpses or fleeting views, but from other locations, the views of the site would be for longer durations. In any event, wherever it is viewed from, the proposal would be seen as an incongruous visual element within the landscape.

11. An amended landscape strategy has been submitted with the appeal, providing details of new planting, which includes new trees as well as establishing a meadow area to the south east of the proposed dwellings. I accept that this would improve an area which I observed to be overgrown and the planting of new trees would supplement the screening that is already present at the boundaries of the site. However, the trees would filter views of the proposal, rather than completely screen them and native tree and shrub planting is likely to provide limited screening during the winter months. In the circumstances, I consider that the development would remain a discordant feature within the landscape, which would not be successfully mitigated by additional planting.
12. Thus, I find that the scheme would be harmful to the character and appearance of the area, including that of the adjacent Area of Outstanding Natural Beauty. Accordingly, the proposal would conflict with saved policy CP7 of the Cheltenham Borough Local Plan – Second Review (adopted 2006) as well as policies SD4, SD6 and SD7 of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (adopted 2017). Together, and amongst other things, these policies seek to ensure development complements the character of a locality, responds positively to the character of its surroundings, protects landscape character for its own intrinsic beauty and that development within the setting of the AONB conserves its scenic beauty. The scheme would also conflict with the landscape protection aims of the National Planning Policy Framework.
13. There would also be conflict with policies CE1 and CE3 of the Cotswolds Area of Outstanding Natural Beauty Management Plan (2018-2023), insofar as these policies seek to ensure that development has regard to the scenic quality of the AONB and its setting, as well as that development respects local distinctiveness.
14. Whilst there are trees to the eastern boundary that would partially shade the site, the southern aspect of the garden for plot 2 would for much of the day be unshaded. As such, I do not consider that there would be undue pressure to remove these trees. I note that Policies GE 5 and GE 6 are referred to in the reason for refusal. However, these policies refer to the protection and replacement of trees, as well as trees and development. As the appeal scheme proposes no direct removal of trees as part of the development, I find no conflict with these policies.

Other Matters

15. The Council accept that they are unable to demonstrate a 5-year housing land supply; currently with a 3.7-year supply. The provision of two new dwellings would therefore be a benefit although this would be relatively limited in terms of addressing the shortfall due to the small size of the development. There would also be associated economic benefits, including through spend during the construction as well as expenditure by occupiers. There would also be social benefits, including the provision of modern housing at a sustainable location. However, for the same reason as given above, these would be limited also.

16. I am aware that since the refusal of planning permission, a revised scheme has been granted approval for the replacement of the existing dwelling and one additional dwelling. The appellant has indicated that it is likely that this scheme will come forward as an alternative to the scheme that is before me. Whilst this is noted, the construction of one additional dwelling at the site, rather than the two proposed in the appeal scheme would not result in the degree of harm that I have identified from this current proposal. Thus, the fallback position is a matter to which I attribute little weight in this case.
17. I have also had regard to the appellant's comments in respect of the density of development, as well as that the scheme would comprise an efficient use of land. There is also reference to the dwellings being visually attractive, comprising good architecture and taking account of the need to plan for climate change. These are matters with which I do not disagree, and they are all benefits that would arise from the development.
18. However, the harm that I have identified in respect of the character and appearance of the area and setting of the AONB is of compelling importance. The adverse impacts that would arise would, in this case, significantly and demonstrably outweigh the aforementioned benefits when assessed against the policies in the Framework. The proposal would conflict with the development plan when taken as a whole and there are no material considerations that indicate that the decision should be made otherwise than in accordance with it.
19. In reaching this conclusion I have considered whether planning conditions could provide satisfactory mitigation but have concluded that they could not. I have also considered the appellant's reference to other developments that have been granted approval by the Council, both within and adjoining the AONB. Whilst some details of these have been provided, I am unable to draw any useful comparisons between those cited cases and the scheme that is before me. There is reference to the site comprising previously developed land (PDL). Whilst I have not considered this matter in detail, even if I were to agree that the site is PDL, any benefit in this regard would not be sufficient to overcome the harm that I have identified above.

Conclusion

20. For the reasons given above and having regard to all matters raised, I conclude that the appeal should be dismissed.

Martin Allen

INSPECTOR

FAO Mr Ben Warren
Planning Case Officer for:

**20/02296/FUL - Villa Nova Undercliff Terrace Cheltenham Gloucestershire
Proposed Demolition of existing dwelling, garage and shed and erection of
replacement dwelling and additional new dwelling with garaging**

I write further to my original letter objecting to the proposal to redevelop the site of Villa Nova, Undercliff Terrace with 2no. residential dwellings.

The revised plans dated 23 March 2021 which see the design and layout of the proposed dwellings amended, their scale significantly reduced and landscaping proposals put forward have addressed my concerns about the visual impact of the development on the character and appearance of the adjacent AONB and watercourse running through the site.

There remains a window in the apex of the rear gable serving the bedroom within the roofspace which would potentially afford views into neighbouring gardens but note that this could easily be resolved by way of some form of condition requiring obscure glazing and restricted opening. Alternatively the window could be replaced by glazing within the apex with above eye-level cill which would effectively repeat the detail in the window below.

I am grateful that revisions to the plans were sought and feel that the revised plans acknowledge the importance of the AONB and more readily reflect surrounding development.

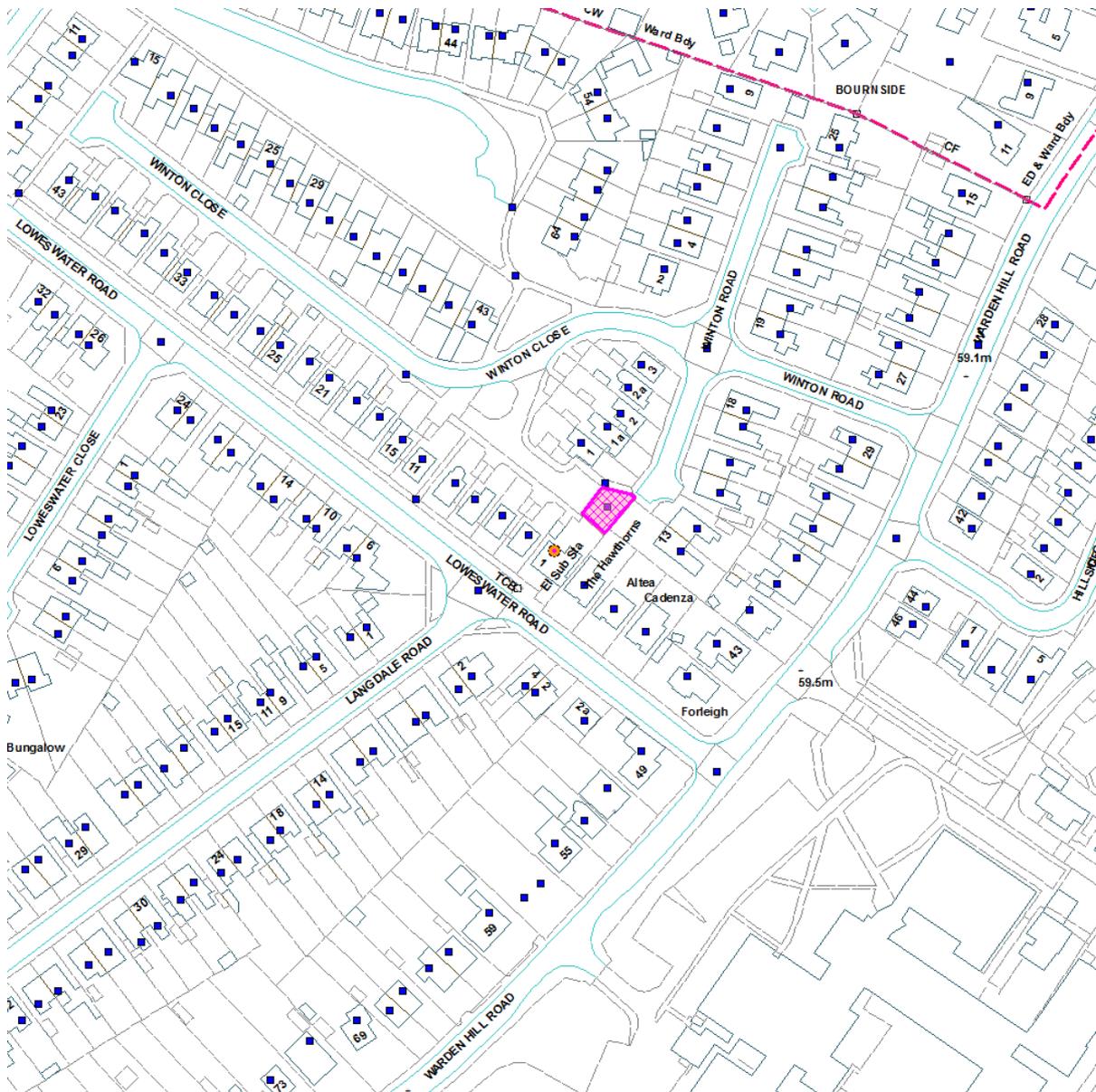
Yours sincerely



DJ Planning

APPLICATION NO: 21/00505/COU	OFFICER: Mr Daniel O Neill
DATE REGISTERED: 4th March 2021	DATE OF EXPIRY: 29th April 2021 (E.O.T: 21/05/2021)
DATE VALIDATED: 4th March 2021	DATE OF SITE VISIT: n/a
WARD: Warden Hill	PARISH: n/a
APPLICANT:	Mr Adam Russell
AGENT:	n/a
LOCATION:	1 Loweswater Road, Cheltenham, Gloucestershire
PROPOSAL:	Change of Use to land at the rear to extend garden land

RECOMMENDATION: Permit



This site map is for reference purposes only. OS Crown Copyright. All rights reserved Cheltenham Borough Council 100024384 2007

1. DESCRIPTION OF SITE AND PROPOSAL

- 1.1 The application site comprises a strip of grassland to the rear of 1 Loweswater Road and is under the ownership of said owner/occupier at this residential property. This site is accessed via a section of Winton Close which serves primarily as an access road to the rear garages of Loweswater Road and Winton Road.
- 1.2 1 Loweswater Road is a detached two storey dwelling dating back from the 1970s with the existing rear garden land backing onto the parcel of land and rear garage accessed via Winton Close. The front elevation is accessed by a pedestrian footpath and garden fronting onto Loweswater Road.
- 1.3 The applicant is seeking planning permission for a change of use of land at the rear to extend the garden land and subsequent residential curtilage.
- 1.4 An application for a new dwelling was submitted in 2020 but was subsequently withdrawn following officers concern that the land was not appropriate in context for an independent dwelling. This application is separate and relates in no way as pretext for the establishment of a new dwelling.
- 1.5 The application has been requested to be determined at planning committee by Cllr Oliver over the impact on the wider locality and any future development.

2. CONSTRAINTS AND RELEVANT PLANNING HISTORY

Constraints:

Airport safeguarding over 15m
Principal Urban Area

Relevant Planning History:

03/00656/REVOKE 22nd May 2003 REV
Revocation of tree preservation order

90/00193/PF 29th March 1990 PER
Erection Of Extension

81/00698/PF 30th July 1981 PER
Erection of single storey extension to provide a playroom

14/01357/FUL 30th September 2014 PER
Erection of two storey rear extension

20/01833/FUL 4th December 2020 WDN
Erection of single storey dwelling on land adjacent 1 Loweswater Road

3. POLICIES AND GUIDANCE

National Planning Policy Framework

Section 2 Achieving sustainable development
Section 4 Decision-making
Section 12 Achieving well-designed places

Adopted Cheltenham Plan Policies

D1 Design
S1 Safe and sustainable living

Adopted Joint Core Strategy Policies

SD4 Design Requirements
SD14 Health and Environmental Quality
INF1 Transport Network

4. CONSULTATIONS

GCC Highways Planning Liaison Officer

23rd March 2021

Gloucestershire County Council, the Highway Authority acting in its role as Statutory Consultee has undertaken a full assessment of this planning application. Based on the appraisal of the development proposals the Highways Development Management Manager on behalf of the County Council, under Article 18 of the Town and Country Planning (Development Management Procedure)(England) Order, 2015 has no objection.

The Highway Authority has undertaken a robust assessment of the planning application. 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. There are no justifiable grounds on which an objection could be maintained.

The Highway Authority therefore submits a response of no objection.

Building Control

23rd March 2021

No comments to be made.

5. PUBLICITY AND REPRESENTATIONS

Number of letters sent	8
Total comments received	4
Number of objections	4
Number of supporting	0
General comment	0

5.1 Letters of notification were sent to 8 neighbouring properties. 4 comments in objection were received and have been summarised but not limited to the following points;

- Impact on the character and appearance of the locality
- Loss of open space within the housing estate
- Harm to biodiversity
- Impact on street parking and highways safety
- Inappropriate design in context of the locality

- Works to original vegetation undertaken without consent

6. OFFICER COMMENTS

6.1 Determining Issues

6.2 The main considerations when determining this application are the principle of a change of use of land to residential, impact on the wider locality, the amenities of neighbouring properties and any highway safety implications.

6.3 The site and its context

6.4 The application site is small strip of flat of rough grassland land that is rectangular in shape and located adjacent to the rear of 1 Loweswater Road. A timber fence panel runs along the entire length of the site facing south-east which acts as a boundary enclosure to a neighbouring property's front garden. To the north-east is a public footpath which provides a pedestrian route to Winton Road and Winton Close. Along the southerly western side of the site is a turning head used for overspill off road parking to the surrounding properties.

6.5 There are other examples of small parcels of soft landscaped land within the locality of the wider housing estate. It is evident that these areas were visual buffers between the interconnected cul-de-sacs and breaks between the roads.

6.6 Properties along Loweswater Road back onto Winton Close and the adjacent turning circle. This is a similar situation for properties that front onto Winton Road and are in the immediate vicinity of the application site. The rear of these properties are characterised by brick boundary enclosures, either red or buff brick, and attached rear garages accessed via Winton Close.

6.7 Principle, impact on wider locality and design

6.8 JCS policy SD4 requires development to be of a high standard of design that respects the character of the site and its surroundings. This is reinforced by Cheltenham Plan policy D1 requiring development to complement and respect neighbouring development and the character of the locality. Section 124 of the NPPF sets out how good design is a key aspect to achieving sustainable places and creating better places in which to live.

6.9 The application proposes to extend the garden land to 1 Loweswater Road by changing the use of the site into residential curtilage. The site lies within the Principal Urban Area (PUA) and sits within recognised urban setting. There is nothing to suggest that the principle of redeveloping this land into residential curtilage would be unacceptable, however site specific issues such as impact on the locality and design would need to be taken into consideration.

6.10 Consideration has been given to the proposed development impact on the character and appearance of the wider locality. The intention is to surround part of the land with fencing thus incorporating this into the existing garden land, while an area designated to off-road parking and soft vegetation is proposed adjacent to the pedestrian footpath.

6.11 As outlined above, this area can be characterised as a visual buffer/break between the roads and interconnected cul-de-sacs. Whilst it is proposed to use this land for private amenity purpose, the overall sense of grassland and buffer zone between Winton Close and Winton Road will be retained given that no outbuildings or structures of any kind are proposed which would create an abrupt visual end-stop. As such, this area of land will still

read as break between the established dwellings between the interconnected roads/cul-de-sacs.

- 6.12** There was concerns raised that the development with fencing would remove this area as an open space used by the surrounding properties and restrict any view of this land. This land is not designated as open green space or other protected open land. A timber panel fence encloses two sides of the land and the land abounds several properties rear gardens. This has already somewhat compromised the area as an open space and it should be noted that a 1m boundary treatment can be erected without planning permission at any time.
- 6.13** The predominant feature of boundary treatments within the locality are brick walls, however, given the sites location timber fencing would be appear as a less visually harsh boundary treatment and is considered to be more appropriate. A condition has been attached requesting further details to ensure adequate design of this fence including materials, dimensions, finishes etc.
- 6.14** Part of this land will be used for vehicular off-road parking to the occupiers at 1 Loweswater Road. A small triangular section of shrubbery and bushes is proposed between the pedestrian footpath and this proposed parking area. This will soften the landscape and provide a vegetative cushion for users of the pedestrian path. A condition has been attached that prior to occupation details of these works are provided to ensure good design.
- 6.15** For reasons outlined above, officers consider that the proposed development is acceptable in principle. The character of this land would be retained as a buffer/break between the interconnected cul-de-sacs, while the appearance of the works will complement the existing boundary treatments and gardens land of the surrounding area. On balance, it is considered that the proposal would no warrant a refusal of planning permission in this instance.

6.16 Impact on neighbouring property

- 6.17** Policy SD14 of the JCS and policy D1 of the Cheltenham Plan requires development not to cause any unacceptable harm to the amenity of the adjoining land users or locality. Development should not cause a loss of light, privacy, outlook or create an unacceptance distance and noise.
- 6.18** The proposed change of use of land resulting in an enlarged rear garden area should not cause any significant harm to the amenity of neighbouring land users. The proposal will not impact the light levels or the privacy of neighbouring properties. This is a residential area with gardens already in close proximity to each other, the site will be used by the occupiers of 1 Loweswater Road, so there will be no unacceptable increase in noise.
- 6.19** The proposed off-road parking has raised a concern that this will impact the outlook for a properties adjacent to the land on Winton Road. Parking opposite this parcel of land is predominant and it is common for vehicles to park on the road outside properties on Winton Road. As such, this outlook will remain relatively unchanged and will not cause an unacceptable loss of outlook.

6.20 Access and highway issues

- 6.21** Gloucestershire County Council highways have been consulted on this application and they raise no objection to the formation of vehicular parking and a dropped kerb. As such, it is considered that the proposal will not cause have safety implications to the transport network.

6.22 A concern was raised that the allocation of parking on the land would result in a loss of on street parking. The turning circle adjacent to the land is used as overspill for parking to the surrounding properties however this area has no defined parking allocation or any form of resident permits. There is ample area to use this road for on-road parking and the proposal will not have any detrimental impact to the existing situation.

6.23 Biodiversity

6.24 Several comments regarding the impact to the local biodiversity have been received as part of the neighbour's consultation process.

6.25 Every planning application is screened by the Gloucestershire Centre for Environmental Records (GCER) to inform if any ecological information to biodiversity issues are relevant when determining an application. No records or biodiversity alerts have been indicated by the GCER.

6.26 Other considerations

6.27 It has come to officer's attention that land had previously been covered heavily in hedgerow and shrubs, with a large mature tree. Following the acquisition of this land by the owners at 1 Loweswater Road, this vegetation has been removed from the site and is now a strip of flat rough grassland. Concerns were raised that these works had removed this vegetation and tree without prior approval. No formal written consent was required for these landscaping works to be undertaken and this is not pertinent to ongoing application.

6.28 A street lamp and telephone pole are located on the edges of the site. Any relocation of these structures will require formal consent from Gloucestershire County Council and is not a relevant planning consideration.

6.29 The application form states that a "summer house" could be erected on the site however this is not indicated within any of the submitted plans or other documents. This application has only considered the merit of the change of use and subsequent fencing. Permitted development rights have been removed for this parcel of land as any outbuilding will require careful consideration.

7. CONCLUSION AND RECOMMENDATION

7.1 In light of the above, officer consider that the proposed development is compliant with the relevant local policies and national policies.

7.2 Officer recommendation is to permit this application subject to the conditions set out below;

8. CONDITIONS / INFORMATIVES / REFUSAL REASONS

- 1 The planning permission hereby granted shall be begun not later than the expiration of three years from the date of this decision.

Reason: To accord with the provisions 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 planning permission hereby granted shall be carried out in accordance with the approved plans listed in Schedule 1 of this decision notice.

Reason: For the avoidance of doubt and in the interests of proper planning.

- 3 Notwithstanding the provisions of The Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order revoking and/or re-enacting that order with or without modification), no plant, structures, buildings, walls, fences or other means of enclosure associated with the development hereby permitted shall be constructed or installed without express planning permission.

Reason: Any further buildings, structures or alterations would require further consideration to safeguard the amenities of the area, having regard to policies D1 and SL1 of the Cheltenham Plan (2020) and adopted policies SD4, SD7 and SD14 of the Joint Core Strategy (2017).

- 4 The following elements of the scheme shall not be installed, implemented or carried out unless in accordance with details which shall have been submitted to and approved in writing by the Local Planning Authority, and shall be retained as such thereafter;

Boundary Fencing (to include but not limited to specific product details (including material(s), finish/colour(s) and dimensions)).

Reason: In the interests of the character and appearance of the area, having regard to adopted policy D1 of the Cheltenham Plan (2020) and adopted policy SD8 of the Joint Core Strategy (2017).

- 5 Prior to first occupation of any part of the development, full details of all hard/soft landscaping shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall provide details of all finished ground levels; new hard surfacing of open parts of the site which shall be permeable or drained to a permeable area; a planting specification to include [species, size, position and method of planting of all new bushes and shrubs];

Any trees or plants indicated on the approved scheme which, within a period of five years from the date of planting, die, are removed or become seriously damaged, diseased or dying shall be replaced during the next planting season with other trees or plants of a location, species and size which shall be first agreed in writing by the Local Planning Authority. All hard landscape works shall be permanently retained in accordance with the approved details [delete if not appropriate].

Reason: In the interests of the character and appearance of the area, having regard to adopted policies D1, G12 and G13 of the Cheltenham Plan (2020), and adopted policies SD4 and INF3 of the Joint Core Strategy (2017). Approval is required upfront because the landscaping is an integral part of the development and its acceptability.

INFORMATIVES

- 1 In accordance with the requirements of The Town and Country Planning (Development Management Procedure) (England) Order 2015 and the provisions of the NPPF, the Local Planning Authority adopts a positive and proactive approach to dealing with planning applications and where possible, will seek solutions to any problems that arise when dealing with a planning application with the aim of fostering the delivery of sustainable development.

At the heart of this positive and proactive approach is the authority's pre-application advice service for all types of development. Further to this however, the authority

Page 54

publishes guidance on the Council's website on how to submit planning applications and provides full and up-to-date information in relation to planning applications to enable the applicant, and other interested parties, to track progress.

In this instance, having had regard to all material considerations, the application constitutes sustainable development and has therefore been approved in a timely manner.

- 2 The Local Highway Authority has no objection to the above subject to the applicant obtaining a section 184 licence. The construction of a new access will require the extension of a verge and/or footway crossing from the carriageway under the Highways Act 1980 - Section 184 and the Applicant is required to obtain the permission of Gloucestershire Highways on 08000 514 514 or highways@gloucestershire.gov.uk before commencing any works on the highway.

APPLICATION NO: 21/00505/COU	OFFICER: Mr Daniel O Neill
DATE REGISTERED: 4th March 2021	DATE OF EXPIRY : 29th April 2021
WARD: Warden Hill	PARISH:
APPLICANT:	Mr Adam Russell
LOCATION:	1 Loweswater Road Cheltenham Gloucestershire
PROPOSAL:	Change of Use to land at the rear to extend garden land

REPRESENTATIONS

Number of contributors	4
Number of objections	4
Number of representations	0
Number of supporting	0

Jalna
13 Winton Road
Hatherley
Cheltenham
Gloucestershire
GL51 3AX

Comments: 26th March 2021

I wish to object to this proposal, both in principle and in detail.

My address is 13 Winton Road and the site proposed for development is immediately in front of my house adjoining the western boundary.

It is currently, and has been for many years, an open grassy space with no formal planting (though I understand that there used to be a mature tree which has been removed without consent). While maintenance of this grassy area should be improved, any structures, including fences, will significantly affect the planned amenity of the area especially as a place for children safely to play.

Any development will impinge on my property, especially if there is a boundary or any structure erected or any subsequent planting with a height greater than 2 metres.

The owner of the nearby house has made no evident attempt to contact me to discuss this proposal. In particular his stated intention is to take access to the site from Winton Road will involve crossing part of my land. This cavalier assumption is completely unacceptable.

1A Winton Road
Hatherley
Cheltenham
Gloucestershire
GL51 3AY

Comments: 28th March 2021

RE planning application: Change of use of land at the rear to extend garden land at 1 Loweswater Road application number 21/00505/COU

We would like to object to the change of use of this land.

Further to the above change of use there was a previous application in November of last year to build: first a two-story property and latterly a single-story property with single parking space on this site see planning application: 20/01833/FUL. This was subsequently withdrawn by the applicants.

This application for a single parking space and "summer house" on this land raises the concern that the change of use applied for in this application is a prelude to obtaining planning permission for Full development of this site in the future.

Our objections are the same as to the previous planning application as follows:

Change of use of the land

It was suggested in the application that this land was redundant "waste land" - but this is not the case.

The small green areas were originally designed as part of the road lay out for the enjoyment of the residents and to create a visual buffer between the houses of Loweswater and Winton road.

From the building of the estate in the 1971, until very recently, it contained a large feature tree and was maintained by the local council (as all the small green areas of the road and estate are still currently) and a well-maintained hedge surrounding the area (please see google maps image: <https://www.google.co.uk/maps/@51.8886836,-2.1020676,3a,75y,131.77h,85.7t/data=!3m6!1e1!3m4!1sX-VEB-I-UoMh1PtShujrQA!2e0!7i13312!8i6656>). We were under the impression this communal land was council owned (as it was regularly maintained as part of the council maintenance of the local green spaces of Fleckers Drive and the other green space on Winton Road estate) and as such is a local amenity to be enjoyed by the residents. It was designed as green space as part of the Winton Road estate. We were very shocked that this land was able to be sold , the first we knew of this was when the large mature tree was removed along with the hedgerows.

This site is also a natural haven for wildlife and one of the few on our estate area. It provides refuge to a number of small animals and birds which would be lost if the land was tarmacked over for a parking space and a summer house built.

Visual impact on the surrounding houses and Road

By developing this land and allowing parking on there will drastically encroach towards the property at number 1 Winton road leaving it very little visual space and a view of a parked car facing their property living room. It would give an overcrowded aesthetic to Winton road and reduce the visual green space and creating a feeling of over development. This change of use of this land impacts the visual character of the original road design and area. The deeds associated with our houses and estate, state that the frontages, onto which this land faces should be maintained to a reasonable level. This land has not been maintained to the level required.

Parking space and safety

Converting the land to a parking space will change the aspect when looking down the road making it feel much more enclosed. With the possibility of a commercial van being parked on the land it would create an unpleasing view from Winton road. The stepping back of this space from the road and the dropped curb is also of concern for the safety of pedestrians using the path abutting the land. There is a very popular cut through from Winton road to Loweswater road and this path is used to access it, often by children heading to school. Vehicles from the proposed space would be able to reverse without full site of pedestrians - this creates a safety issue. It would also be a loss of a space for the on-road parking currently used by visitors to the Winton road area.

Street lighting and telephone pole

The application seems to be missing the current amenity of the lamppost street lighting that is on the land. As communal land this was designed to provide street lighting to the car parking area and rear of the properties on that road. The removal of this would create inadequate lighting and unsafe environment for people using this popular path to cut through to Loweswater Road, not to mention the safety of the garages from petty crime. The telephone pole which provides telephone lines into a large number of resident properties on Winton road is also not covered in this change of use. Further there is not a suitable site or positioning to move it to where it wouldn't impact Winton Roads layout or residents.

Scale and size of fence and summer house

The change of use also mentions a "summer house" and "fencing" but fails to mention the height of either of these structures or the sizes involved. The frontages of Winton road and Loweswater road are stated in the plans to be kept as grass areas with open frontages to maintain the open grass space. This change of use would seriously affect this aesthetic of the area, especially if high structures or fencing is placed on the land that exceed the current planning height of fences on frontages of Winton Road at 1m. Any height changes would directly and severely affect the bungalow in the corner of Winton Road which faces the land as it is a low-lying property.

5 Loweswater Road
Cheltenham
Gloucestershire
GL51 3AZ

Comments: 28th March 2021

We wish to object to this proposal for the following reasons.

Open space

The site until recently was maintained by the council and contained a mature tree and shrubs. It was designed into the estate to provide visual amenity and an open view, which it achieved. It was not waste land as was stated in the proposal. Only recently has it been cleared and allowed to grow scrubby.

Street light

No mention is made in the proposal of the streetlight that is located on the land and provides lighting to the rear car parking area of Loweswater Road. Removing this would

make for an unsafe environment for pedestrians and for residents parking in front of their garages.

3 Loweswater Road
Cheltenham
Gloucestershire
GL51 3AZ

Comments: 22nd March 2021

I write to object to this proposal, the estate was constructed 50 years ago and at that time the developer and local authority planners agreed what houses were to be built, what roads and parking spaces to be built, what spaces were going to be left open and what landscapes were to be planted.

Over this period of 50 years this site has been green open space with a historic hedge line running around its perimeter and a mature sycamore tree being the predominate feature, this site was maintained regularly by the Local Authority since this time.

This green open space provides a visual amenity to residents and visitors alike, it breaks up straight hard lines caused by brick walls and fences.

The new owner has removed the hedge in full along with the mature sycamore tree and is now claiming that the site is waste land to which it is not. The degradation of the site was done to remove any objection prior to submitting the previous planning application 20/01833/FUL to build on this site which has been withdrawn. Clearing of the site was done without a full consultation with the Local Authority and local residents.

The National Planning Policy Framework (NPPF) section 8 Promoting healthy and safe communities' clause 97 states: -

97. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- (a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- (b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- (c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

It is clear to see in the NPPF guidance on existing open spaces on estates that are already constructed shall not be built on.

These open spaces were designed into the estate to break up the urban sprawl and provide visual amenity with views and vistas that have now matured providing a parkland feel that the estate designers and local planners sought to achieve.

If we start to remove these open spaces the NPPF framework then ceases to be worth the paper it is printed on.

Biodiversity

Open spaces along with breaking up urban sprawl provide areas that are used by birds and small mammals, the local authority has sought to provide wildlife corridors, promote biodiversity and geodiversity, within its open spaces.

Hedges are a lifeline for wildlife, providing food and habitat, including for many of the birds within the Farmland Bird Index as well as for priority mammal species in the UK's Biodiversity Action Plan.

They also help with pollination and pest control, reduce flood risk, conserve soil and capture and store carbon, to the extent that the UK's Committee on Climate Change suggested in a 2019 report that the hedgerow network should be extended by 40% as part of the UK's 2050 net zero emissions target.

Natural England went further, recently recommending increasing England's hedge network by 60% to 882,000km (enough to circle the Earth roughly 22 times) to support thriving biodiversity.

This area is used by the Hazel dormouse and slow worms, both are protected under the Wildlife and Countryside Act 1981, as the site has been left relatively undisturbed, they have found a refuge place here.

These creatures move between the allotments, hedgerow along Loweswater road and these open spaces at various times of the year to feed on the various seasonal resources that these sites provide.

In early spring I have seen the Hazel dormouse climb the sycamore tree to feed on the early blossom and in autumn they make their way through my garden to this site, probably to hibernate over winter.

Having allowed birds and mammals to use this site we are now going to go against the local Authority's own policies to promote biodiversity.

UK statutory instruments of 1997: 1160 governs the Local Planning Authorities responsibilities with regards to protecting these sites.

This page is intentionally left blank

APPLICATION NO: 21/00579/LBC		OFFICER: Mr Chris Morris	
DATE REGISTERED: 12th March 2021		DATE OF EXPIRY: 7th May 2021	
DATE VALIDATED: 12th March 2021		DATE OF SITE VISIT: n/a	
WARD: Pittville		PARISH: n/a	
APPLICANT:	Cheltenham Borough Council		
AGENT:	Cheltenham Borough Council		
LOCATION:	Pittville Pump Room, East Approach Drive, Cheltenham		
PROPOSAL:	To replace six cracked and unsafe slabs like for like		

RECOMMENDATION: Grant



This site map is for reference purposes only. OS Crown Copyright. All rights reserved Cheltenham Borough Council 100024384 2007

1. DESCRIPTION OF SITE AND PROPOSAL

- 1.1 Pittville Pump Room is a grade II listed building within Pittville Park, a grade II listed Park and Garden. It is also within the Central Conservation Area: Pittville Park Character Area.
- 1.2 The proposed works are for the replacement of six cracked and unsafe floor slabs under the colonnade. The proposed floor slabs are to match the existing Welsh pennant sandstone on a like for like basis.
- 1.3 The application requires consideration by Planning Committee due to the property being in the ownership of Cheltenham Borough Council and therefore falling outside the agreed scheme of delegation.

2. CONSTRAINTS AND RELEVANT PLANNING HISTORY

Constraints:

Conservation Area
Listed Buildings Grade 1
Principal Urban Area

Relevant Planning History:

03/00867/LBC 1st October 2003 GRANT

Installation of lightning conductor system to BS 6515:1999

03/01162/LBC 21st October 2003 WDN

Refurbishment to box office in foyer. Internal work

03/01163/LBC 21st October 2003 WDN

Installation of modern catering kitchen, re-plastering throughout (no alteration to vent or water routing/waste)

04/00117/LBC 6th April 2004 GRANT

Installation of modern catering kitchen, repairs to plaster. New extract vent at roof level no alteration to water routing/waste

04/00118/LBC 6th April 2004 GRANT

Refurbishment to box office in foyer (all internal work)

85/00064/LS 27th June 1985 PER

Pittville Pump Room Car Park Cheltenham Gloucestershire - Erection Of 6 Light Standards

87/00218/LS 26th March 1987 PER

Pittville Pump Room Cheltenham Gloucestershire - Alteration To Widen Existing Pair Of Doors Serving Chair Store

87/01249/AN 17th December 1987 REF

Pittville Pump Rooms Cheltenham Gloucestershire - Display Of Non Illuminated Advertisement

96/01060/LA 20th February 1997 WDN

Attachment Of Brackets Supporting Cameras To First Floor Window Ledge At Rear Of Building To Increase Security Of Public Car Parking Area

98/01136/LA 11th February 1999 WDN

Repainting Of Interior Of The Oval Room

04/00719/LBC 3rd August 2004 GRANT

Installation of a new lift and associated internal alterations

04/00926/LBC 1st July 2004 PGOSW

Replacement of failed render with stone above lead flashing detail on south elevation at first floor level

05/00938/FUL 21st July 2005 WDN

New gates and railings at East Approach and West Approach entrances to Pittville Pump Rooms and Park

05/00939/LBC 18th July 2005 WDN

New gates and railings at East Approach and West Approach entrances to Pittville Pump Rooms and Park .

05/01664/FUL 27th June 2006 WDN

New gates and railings at East Approach and West Approach entrances to Pittville Pump Room and Park

05/01665/LBC 27th June 2006 WDN

New gates and railings at East Approach and West Approach entrances to Pittville Pump Rooms and Park.

06/00700/LBC 22nd June 2006 WDN

Automation of principal entrance doors to improve disabled access including installation of external barriers

07/00361/FUL 25th May 2007 PER

New gates and railings at East Approach entrance and West Approach entrance to Pittville Pump Rooms and park

07/00362/LBC 25th May 2007 GRANT

New gates and railings at East Approach entrance and West approach entrance to Pittville Pump Rooms and park

07/01529/LBC 22nd January 2008 GRANT

Removal of maple boarding on battens laid over original pine boarding and replacement with oak boarding on plywood underlayment over pine boarding, with reinstatement of existing heating system to Main Hall and Spa Room and addition of solar panel assembly mounted on external parapeted flat roof over Oval Room

08/01485/LBC 12th January 2009 GRANT

Internal redecoration of the first floor rooms, the ground floor entrance foyer and the second staircase together with minor building works, and reinstatement of fittings relevant to the rooms being decorated

10/00064/LBC 13th April 2010 GRANT

Relocation of partition wall within rear chair store and modifications to chair store entrance

83/01243/LA 26th January 1984 GRANT

Internal alterations to partition off female WC and provision of separate uni-sex disabled WC

82/01181/LA 29th April 1982 GRANT

Alterations comprising 2 decorative gates to East and West balconies, a partition to the head of the West stair and a partition beneath secondary staircase at first floor level

16/01291/LBC 23rd September 2016 GRANT

Replace internal door at Pittville Pump Room

16/01590/CLBW 22nd September 2016 CERTPU

Replacement doors to gas meter cupboard

17/00183/CLBW 20th February 2017 CERTPU

Upgrade existing doors to fire doors

18/02136/LBC 21st December 2018 GRANT

Replacement of third decayed timber to dome at top of building with new.

19/00485/LBC 4th June 2019 GRANT

To remove asbestos cement promenade tiles from the flat roof to the rear of the Pittville Pump Rooms 1960 extension, repair existing asphalt covering and overlay with liquid applied waterproof membrane colour to match existing, renew 10 nr circular skylights using white GPP to match existing profiles, with triple skin polycarbonate skin to adjacent existing leads and copper flashings to suit

20/01702/LBC 21st December 2020 GRANT

Investigate survey to open up three sections of the balcony

20/01899/LBC 29th April 2021 DISPOS

Installation of 8no. speakers located under the colonnade to supply music and announcements to the colonnade area of the Pump Rooms.

3. POLICIES AND GUIDANCE

National Planning Policy Framework

Section 16 Conserving and enhancing the historic environment

Adopted Joint Core Strategy Policies

SD8 Historic Environment

4. CONSULTATIONS

Building Control

21st April 2021

No comments to be made.

5. PUBLICITY AND REPRESENTATIONS

Number of letters sent	0
Total comments received	0
Number of objections	0
Number of supporting	0
General comment	0

- 5.1 A site notice was placed near the site and an advertisement was placed in the Gloucestershire Echo.
- 5.2 No comments were received.

6. OFFICER COMMENTS

- 6.1 It is important to consider the policy context in which the proposal needs to be assessed. The cornerstone of heritage legislation is the Planning (Listed buildings and Conservation Area) Act 1990, Section 16(2), which requires local planning authorities to have special regard to the desirability of preserving the special architectural or historic interest of listed buildings and their setting.
- 6.2 A core principle of the National Planning Policy Framework 2019 (NPPF) is heritage assets be conserved in a manner appropriate to their significance. Chapter 16, paragraphs 193-196 set out the framework for decision making with applications relating to heritage assets. This assessment takes account of the relevant considerations in these paragraphs, most relevant of which for this application is paragraph 192 of the NPPF requiring the significance of heritage assets to be sustained and enhanced, and paragraph 193 requiring great weight be given to the asset's conservation.
- 6.3 The application proposes to replace the six existing damaged floor slabs with like for like matching Welsh pennant sandstone floor slabs. It is currently unknown what the existing floor slabs are laid on but the application proposes they be laid on a bed to also match what is existing. To ensure matching materials are used a condition is suggested relating to this as part of any approval.
- 6.4 It appears the recent damage to the six floor slabs is a result of machinery used for unrelated works to the listed building. To address this the supporting information within the application, by a surveyor working for Cheltenham Borough Council, states, "In terms of maintenance, measures will be put in place. Such as checking the condition of the floor before future work commences and RAMS (Risk Assessment Method Statements) being double checked so only suitable equipment is used by contractors when working from a height. This should prevent any further damage to the portico floor."
- 6.5 The works are proposed to be limited in scope to repairs carried out on a like for like basis and only where necessary. It is considered they sustain the special interest the listed building and therefore comply with Section 16 of the Planning (Listed Building and Conservation Area) Act 1990, Chapter 16 of the National Planning Policy Framework and Policy SD8 of the Joint Core Strategy 2017.

7. CONCLUSION AND RECOMMENDATION

- 7.1 It is recommended to Planning Committee the application be approved with conditions.

8. CONDITIONS / INFORMATIVES

- 1 The listed building consent hereby granted shall be begun not later than the expiration of three years from the date of this decision.

Page 66

Reason: To accord with the provisions of Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

- 2 The listed building consent hereby granted shall be carried out in accordance with the approved plans listed in Schedule 1 of this decision notice.

Reason: For the avoidance of doubt and in the interests of proper planning.

- 3 No materials (including the facing material and its bed) shall be applied unless in accordance with a written specification of the materials and physical samples of the materials, details of which shall have been submitted to and approved in writing by the Local Planning Authority. The works shall not be carried out unless in accordance with the details so approved.

Reason: In the interests of the special architectural and historic qualities of the Listed Building, having regard to Policy SD8 of the Joint Core Strategy 2017 and Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and Historic Environment Good Practice Advice (note 2).

INFORMATIVES

- 1 In accordance with the requirements of The Town and Country Planning (Development Management Procedure) (England) Order 2015 and the provisions of the NPPF, the Local Planning Authority adopts a positive and proactive approach to dealing with planning applications and where possible, will seek solutions to any problems that arise when dealing with a planning application with the aim of fostering the delivery of sustainable development.

At the heart of this positive and proactive approach is the authority's pre-application advice service for all types of development. Further to this however, the authority publishes guidance on the Council's website on how to submit planning applications and provides full and up-to-date information in relation to planning applications to enable the applicant, and other interested parties, to track progress.

In this instance, having had regard to all material considerations, the application constitutes sustainable development and has therefore been approved in a timely manner.

APPLICATION NO: 21/00683/FUL	OFFICER: Mr Ben Warren
DATE REGISTERED: 24th March 2021	DATE OF EXPIRY: 19th May 2021
DATE VALIDATED: 24th March 2021	DATE OF SITE VISIT: n/a
WARD: Lansdown	PARISH: n/a
APPLICANT:	Cheltenham Borough Homes
AGENT:	MHP Design Ltd
LOCATION:	Hanna Court, St Georges Place, Cheltenham
PROPOSAL:	The installation of secure pedestrian and vehicular access gates to the entrance into Hanna Court

RECOMMENDATION: Permit



This site map is for reference purposes only. OS Crown Copyright. All rights reserved Cheltenham Borough Council 100024384 2007

1. DESCRIPTION OF SITE AND PROPOSAL

- 1.1 The application site relates to Hanna Court located and accessed from St Georges Place. The site is within Cheltenham's Core Commercial Area and Central Conservation Area.
- 1.2 The applicant is seeking planning permission for the installation of pedestrian and vehicular access gates at the entrance into Hanna Court.
- 1.3 The application is at planning committee as Cheltenham Borough Homes is the applicant and Cheltenham Borough Council is the land owner.

2. CONSTRAINTS AND RELEVANT PLANNING HISTORY

Constraints:

Airport Safeguarding over 45m
Conservation Area
Core Commercial Area
Principal Urban Area
Residents Associations
Smoke Control Order

Relevant Planning History:

No relevant planning history

3. POLICIES AND GUIDANCE

National Planning Policy Framework

Section 2 Achieving sustainable development
Section 4 Decision-making
Section 8 Promoting healthy and safe communities
Section 12 Achieving well-designed places
Section 16 Conserving and enhancing the historic environment

Adopted Cheltenham Plan Policies

D1 Design
SL1 Safe and sustainable living

Adopted Joint Core Strategy Policies

SD4 Design Requirements
SD8 Historic Environment
SD14 Health and Environmental Quality

4. CONSULTATIONS

GCC Highways Planning Liaison Officer - 8th April 2021

Gloucestershire County Council, the Highway Authority acting in its role as Statutory Consultee has undertaken a full assessment of this planning application. Based on the appraisal of the development proposals the Highways Development Management Manager on behalf of the County Council, under Article 18 of the Town and Country Planning (Development Management Procedure)(England) Order, 2015 has no objection.

The Highway Authority has undertaken a robust assessment of the planning application. 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. There are no justifiable grounds on which an objection could be maintained.

The Highway Authority therefore submits a response of no objection.

Building Control

13th April 2021

No comment

5. PUBLICITY AND REPRESENTATIONS

- 5.1 16 letters were sent to neighbouring land users, a site notice was displayed and an advert was published in the Gloucestershire Echo, no letters of representation have been received in response to this neighbour notification process.

6. OFFICER COMMENTS

6.1 Determining Issues

- 6.2 The main considerations of this application are Highway safety, design, impact on the conservation area and impact on neighbouring amenity.

- 6.3 A site visit has not been carried out for this application, however site photos have been provided and google maps / google street view have been used to fully consider the application.

6.4 The site and its context

- 6.5 The application site relates to Hanna Court which is a residential building comprising a number of flats, managed by Cheltenham Borough Homes. The site is located within the core commercial area, with access to the parking area for this development from St Georges Place. Surrounding uses vary and include residential, commercial and retail uses.

6.6 Highway safety

- 6.7 The proposal is to install pedestrian and vehicle access gates at the entrance to the parking area associated with Hanna Court, the proposed gates are set back into the site and away from the public footpath and highway, with inward opening gates.

- 6.8 Adopted JCS policy INF1 requires all development to provide safe and accessible connections to the transport network. Gloucester Highways as the Local Highways Authority were consulted on this application and their full comments can be read above. No objection has been raised by Gloucestershire Highways, the proposed installation of gates is not considered to result in any highway safety implications and therefore accords with adopted JCS policy INF1.

- 6.9 To ensure no future highway safety conflicts occur, a condition has been suggested which will ensure that the gates are inward opening and retained as such thereafter.

6.10 Design and impact on the conservation area

- 6.11 The site is located within Cheltenham's Central Conservation Area and therefore in accordance with Adopted JCS policy SD8, careful consideration needs to be given to the impact of the proposed works on the design and character of conservation area.
- 6.12 The buildings immediately around the entrance to Hanna Court vary in style, design and character, some are relatively modern buildings, others are traditional in style, with some being listed buildings. The surrounding uses also vary and include residential properties and commercial businesses. The addition of security gates in this location would not be out of keeping with its surroundings, there are a number of sites with access gates in the immediate vicinity. The principle of these works is therefore considered to be acceptable.
- 6.13 In terms of the design, the gates will have the appearance of railings and are proposed to be black in colour. Officers consider the scale, form and design to be acceptable in this location and is not considered to result in any unacceptable harm to the design or character of the surrounding conservation area.
- 6.14 The proposal is therefore considered to be in accordance with adopted Cheltenham Plan policy D1 and adopted JCS policies SD4 and SD8.
- 6.15 **Impact on neighbouring amenity**
- 6.16 The installation of security gates will not result in any amenity issues and is therefore compliant with adopted Cheltenham Plan policy SL1 and adopted JCS policy SD14.
- 6.17 **Other considerations**

Public Sector Equalities Duty (PSED)

As set out in the Equalities Act 2010, all public bodies, in discharging their functions must have "due regard" to this duty. There are three main aims:

- Removing or minimising disadvantages suffered by people due to their protected characteristics;
- Taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people; and
- Encouraging people with certain protected characteristics to participate in public life or in other activities where participation is disproportionately low.

Whilst there is no absolute requirement to fully remove any disadvantage, the duty is to have "regard to" and remove OR minimise disadvantage and in considering the merits of this planning application the planning authority has taken into consideration the requirements of the PSED.

- 6.18 In the context of the above PSED duties, this proposal is considered to be acceptable.

7. CONCLUSION AND RECOMMENDATION

- 7.1 Officer recommendation is to permit the application, subject to the conditions set out below;

8. CONDITIONS / INFORMATIVES

- 1 The planning permission hereby granted shall be begun not later than the expiration of three years from the date of this decision.

Reason: To accord with the provisions 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 planning permission hereby granted shall be carried out in accordance with the approved plans listed in Schedule 1 of this decision notice.

Reason: For the avoidance of doubt and in the interests of proper planning.

- 3 Notwithstanding the approved plans, the entrance gates shall at all times be hung so that they only open inwards into the site.

Reason: To ensure that the highway is not obstructed in the interests of highway safety, having regard to adopted policy INF1 of the Joint Core Strategy (2017).

INFORMATIVES

- 1 In accordance with the requirements of The Town and Country Planning (Development Management Procedure) (England) Order 2015 and the provisions of the NPPF, the Local Planning Authority adopts a positive and proactive approach to dealing with planning applications and where possible, will seek solutions to any problems that arise when dealing with a planning application with the aim of fostering the delivery of sustainable development.

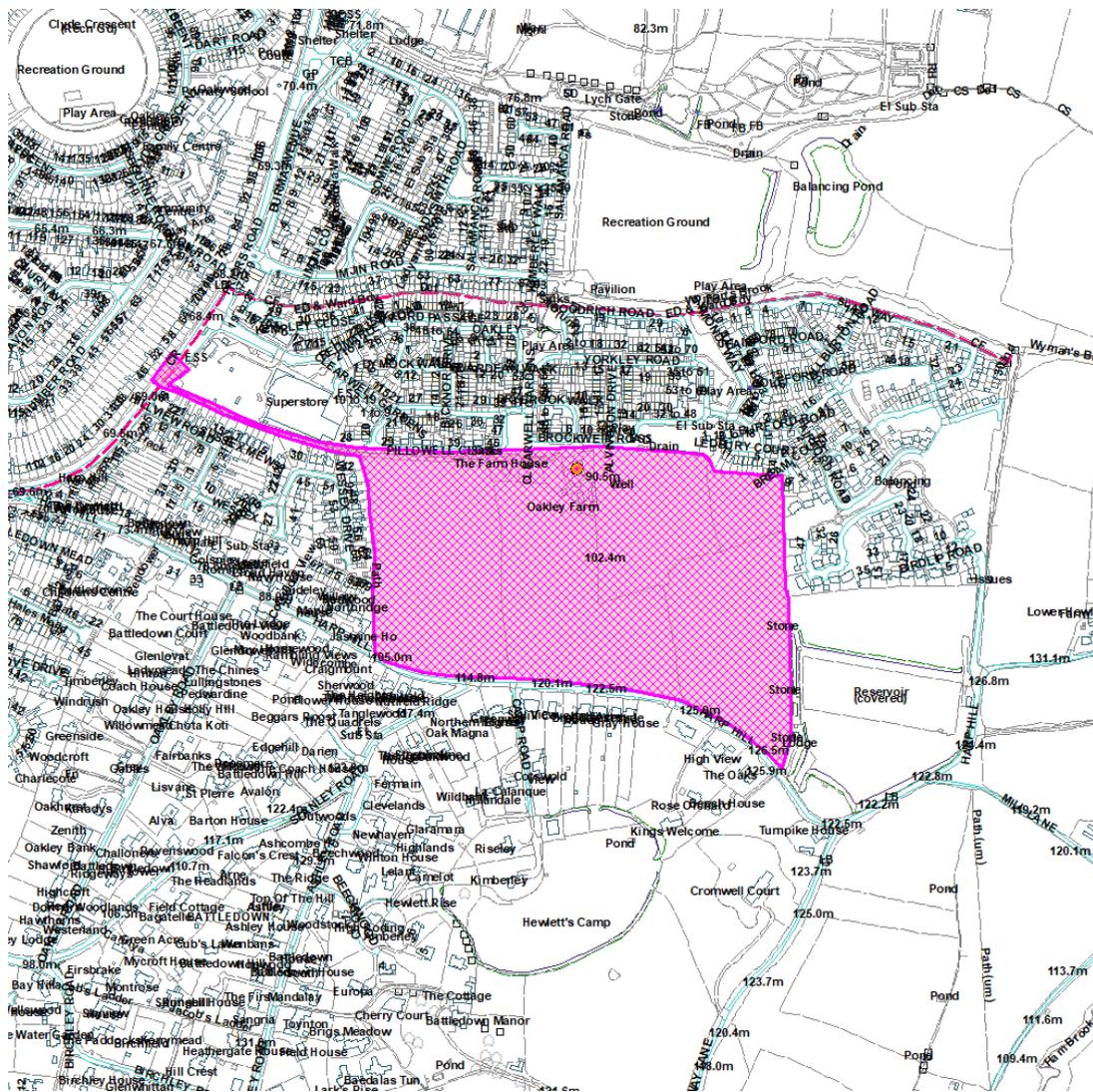
At the heart of this positive and proactive approach is the authority's pre-application advice service for all types of development. Further to this however, the authority publishes guidance on the Council's website on how to submit planning applications and provides full and up-to-date information in relation to planning applications to enable the applicant, and other interested parties, to track progress.

In this instance, having had regard to all material considerations, the application constitutes sustainable development and has therefore been approved in a timely manner.

This page is intentionally left blank

APPLICATION NO: 20/01069/OUT	OFFICER: Mrs Lucy White
DATE REGISTERED: 16th July 2020	DATE OF EXPIRY: 5th November 2020/Agreed Ext of Time 12th March 2021
DATE VALIDATED: 16th July 2020	DATE OF SITE VISIT: 6th August 2020
WARD: Battledown	PARISH: Charlton Kings
APPLICANT:	Robert Hitchins Limited
AGENT:	n/a
LOCATION:	Oakley Farm, Priors Road, Cheltenham
PROPOSAL:	Outline application for development comprising of up to 250 residential dwellings including provision of associated infrastructure, ancillary facilities, open space and landscaping, demolition of existing buildings and formation of new vehicular access from Harp Hill. All matters reserved except for means of access to site from Harp Hill.

RECOMMENDATION: (Refuse)



This site map is for reference purposes only. OS Crown Copyright. All rights reserved Cheltenham Borough Council 100024384 2007

1. DESCRIPTION OF SITE AND PROPOSAL

- 1.1 The application site comprises of an area of approximately 14.9ha of agricultural grassland and associated buildings at Oakley Farm. The land is no longer a working farm albeit, the land appears to be periodically grazed. The original farm house was demolished in 2019 and the remaining, disused ancillary farm buildings vary in age, construction and appearance.
- 1.2 The application site lies wholly within the Cotswold Area of Outstanding Natural Beauty (AONB). The site is bounded by Harp Hill to the south, the Oakley Grange residential development to the east and north and Wessex Drive to the west. The grade II listed Hewlett's Reservoir and Pavilion form part of the east site boundary. The land rises steeply south towards Harp Hill and is sub-divided into separate field parcels, delineated by extensive rows of established and mature hedgerow and trees. A number of established trees occupy other parts of the site, some of which are subject to Tree Preservation Orders.
- 1.3 Despite the natural sub-division of the land, the site is read as one and displays all of the predominant characteristics of the lower pasture slopes of the Cotswold escarpment. The application site lies within the Character Area 2c (Escarpment: Coppers Hill to Winchcombe) as identified in the Cotswold AONB Management Plan 2018-23. The site is prominent in views from Priors Road, Harp Hill, adjoining footpaths and residential areas and is visible from more distant public viewpoints on the Cotswold escarpment and surrounding areas.
- 1.4 The application seeks outline planning permission for development comprising of up to 250 residential dwellings, to include provision of affordable housing, associated infrastructure, ancillary facilities, open space and landscaping, demolition of all existing buildings and the formation of a new vehicular access from Harp Hill.
- 1.5 The applicant is seeking approval for the proposed means of access to the site from Harp Hill. All matters relating to appearance, scale, layout and landscaping are reserved for future consideration.
- 1.6 The proposed development constitutes Schedule 2 development under Part 2, Regulation 6 of the Town and Country Planning (Environmental Impact assessment) Regulations 2017; exceeding the thresholds for numbers of dwellings and site area. The site is also located within a 'sensitive area' (AONB) as defined by Regulation 2(1). In accordance with the Regulations, screening and scoping opinions were issued by the Council in 2019 and the application is accompanied by an Environmental Statement (ES). The ES includes a main body of text divided into sections covering the key potential environmental effects of the proposed development, as set out in the scoping opinion, and is supported by various technical appendices and survey reports.
- 1.7 The Planning Statement and other submitted documents include a Design and Access Statement, Transport Statement, Travel Plan, Utility Statement, Affordable Housing Statement and draft Heads of Terms for s106 obligations (open space/recreational space and affordable housing provision). Note, that prior to their submission, the submitted Planning Statement and a number of other documents were not updated following adoption of the Cheltenham Plan.
- 1.8 Although matters relating to layout, design and appearance and landscaping are reserved matters, an illustrative masterplan and landscape strategy have been provided plus various drawings indicating preliminary access design and layout, access and movement links, building heights and general land use across the site. In addition, site section drawings and a series of photomontages have been provided.

- 1.9** On 26th February 2021, the applicant served notice on the Council of their intention to appeal against the Council's non determination of the application. The period of notice expired on 12th March 2021. The Council received notice from PINS of an appeal lodged by the applicant on 14th April 2021.
- 1.10** Members are being asked therefore, to consider the officer recommendation and putative reasons for refusal had the Council been determining this application in order to advise the Secretary of State of the Council's views. Members may come to a view as to whether to endorse the suggested reasons for refusal and/or alter the recommendation and reasons put forward by officers. Members are reminded that the Council is not the determining authority for this application.
- 1.11** The application had been referred to the Planning Committee (for determination) following requests from Councillors Babbage, Savage, Baker and McCloskey. The reasons for the referral are the level of public interest arising from the application, the scale and significance of the proposals and resultant harm to the AONB.
- 1.12** To assist Members, all consultee responses are reproduced in full and a summary provided of the concerns raised by local residents. The key issues relating to this application are set out in section 6 of the report and each are discussed in broad terms, alongside the national and local planning policy context.

2. CONSTRAINTS AND RELEVANT PLANNING HISTORY

Constraints:

Area of Outstanding Natural Beauty
Airport safeguarding over 15m
Airport Safeguarding over 45m

Relevant Planning History:

18/00458/PREAPP 6th March 2018 CLO
Various works to farmhouse, possible extension

18/01021/PREAPP 15th June 2018 NOT
Redevelopment of the site for approximately 70 dwellings and formal/informal open space, together with associated works

90/00502/GF 28th June 1990 PER
Erection of Agricultural Building

19/00526/SCREEN 2nd April 2019 ISSUE
Request for a screening opinion under Part 2, Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)

19/00916/SCOPE 12th July 2019 SCOPE
Request for EIA Scoping Opinion for Land at Oakley Farm

19/01610/DEMCON 10th September 2019 NPRIOR
Application to determine whether prior approval is required for the demolition of a detached dwelling (The Farmhouse, Oakley Farm) (method of demolition and restoration of the site)

C19/00042/DEMO 20th August 2019 CLOSED

Demolition of two story detached dwelling and surrounding hardstanding and linked outbuilding. Demolished inclusive of foundations. Existing below ground drainage to remain and be prominently plugged. Site remediated to top soil.

3. POLICIES AND GUIDANCE

National Planning Policy Framework

Section 2 Achieving sustainable development

Section 4 Decision-making

Section 5 Delivering a sufficient supply of homes

Section 8 Promoting healthy and safe communities

Section 9 Promoting sustainable transport

Section 11 Making effective use of land

Section 12 Achieving well-designed places

Section 14 Meeting the challenge of climate change, flooding and coastal change

Section 15 Conserving and enhancing the natural environment

Section 16 Conserving and enhancing the historic environment

Adopted Cheltenham Plan Policies

D1 Design

L1 Landscape and Setting

BG1 Cotswold Beechwoods Special Area of Conservation Recreation Pressure

BG2 Cotswold Beechwoods Special Area of Conservation Air Quality

SL1 Safe and Sustainable Living

GI2 Protection and replacement of trees

GI3 Trees and Development

Adopted Joint Core Strategy Policies

SP1 The Need for New Development

SP2 Distribution of New Development

SD3 Sustainable Design and Construction

SD4 Design Requirements

SD6 Landscape

SD7 The Cotswolds Area of Outstanding Natural Beauty

SD8 Historic Environment

SD9 Biodiversity and Geodiversity

SD10 Residential Development

SD11 Housing Mix and Standards

SD12 Affordable Housing

SD14 Health and Environmental Quality

INF1 Transport Network

INF2 Flood Risk Management

INF3 Green Infrastructure

INF4 Social and Community Infrastructure

INF5 Renewable Energy/Low Carbon Energy Development

INF6 Infrastructure Delivery

INF7 Developer Contributions

4. CONSULTATIONS

GCC Highways Planning Liaison Officer

18th August 2020

RECOMMENDATION: **Further information**

Page 77

The application proposes up to 250 dwellings with all matters reserved apart from access. The site does not form part of the adopted Joint Core Strategy.

The access strategy can be separated out into key topics of consideration.

Immediate Pedestrian / Cycle access

The application proposes a shared use cycleway/footway on to Priors Road. Insufficient detail as been provided on this connection. Drawing H828/06 (in appendix H) show part of this link, but no dimensions are provided, a comprehensive drawing showing the full length and width is required. It also shows a new toucan crossing and cycleway, the applicant should show details of the cycleway width and design standards, and the visibility of the crossing given the adjoining street trees. Additionally, the proposal oversails the existing public footpath, this is important as it is unlawful to cycle on a footpath, therefore the owner of the site would need to convey a higher access right to allow cycling to occur. Without higher rights existing the site would rely on Harp Hill for cycle access only which is not considered to be suitable due to the gradient.

Immediate Vehicle Access

The proposal provides a new bellmouth onto Harps Hill, this is supported with visibility splays using the 85th percentile approach speeds. The proposal however fails to provide any details of the dimension of the access or any tracking details and as such this access cannot be agreed. The access also needs to account for the entry into the site, observation indicates that there is a considerable gradient from the access into the site. The applicant has provided an indicative long section this shows a 1 in 20 gradient onto Harp Hill, however to access the majority of the development 160m of 1 in 12.5 is shown, this is unacceptable and no greater lengths than 30m are permitted at that gradient, additionally 1 in 20 should be maintained at the junction. The information submitted is lacking in terms of detail of the access and the indicative sections shows significant challenges which even with considerable earth works would be unacceptable.

Improvements to Harp Hill and Priors Road to Active Travel

New footway is proposed on Harp Hill and Cycleway improvements made to Prior Road including a new toucan crossing. The applicant proposes to address these through a planning obligation as a contribution towards the proposals. The Highway Authority is not satisfied through this approach, the works are necessary to deliver the proposal and as such they should be secured through a planning condition and delivered by a section 278 agreement prior to the first occupation of any dwelling. Therefore, any permission granted should include a condition requiring the applicant to deliver the works define in appendix H and I of the TA.

Off Site Vehicle Mitigation

The TA assesses several junctions in accordance with the agreed scoping paper, the applicant has concluded that there is an impact at the junction of Harp Hill/Priors Road/Hales Road and Hewlett Road which requires mitigation and all other junctions assessed will experience no impact. A drawing of a mitigation scheme for the above junction is provided in appendix R of the TA and the applicant proposes to pay the Highway Authority to deliver this scheme. The Highway Authority does not share these conclusions nor the form of scheme delivery as the development requires it to facilitate access, therefore it should be secured through a planning condition and delivered through a section 278 agreement.

The Highway Authority has reviewed the mitigation scheme in appendix R. It is accepted that the Junction 9 modelling report indicates that the scheme is beneficial however caution is needed on the over reliance of the model and practical consideration is also needed on the likely implications of the scheme to drivers.

Recognising that the AM peak is most sensitive in this instance the correct comparison of junction performance through modelling along is a comparison of table 7.2 scenario 2 and table 7.5 scenario 3A. This looks at a 2024 scenario without development and with development and mitigation, the modelling demonstrates that mitigated scenario shows an erosion of capacity on the east roundabout on all arms.

When considering the actual mitigation scheme it is considered that the modelling results are likely to be realised and the junction is more likely to form as recorded in the current geometry as shown in table 7.5 scenario 3. The proposal widens the "flare" length and "entry width" as defined in CD116 of the Design Manual for Roads and Bridges, however due to the reverse curve these benefits do not result in any change to the give way point and the widening is modest so is unlikely to change a drivers approach position in any meaningful manner. Therefore the modelling result of the mitigation scheme are correct by virtual of the method adopted, but in practice is unlikely to actually change in driver behaviour, hence the Highway Authority considers the no mitigation reporting to be more realistic and this shows significant capacity erosion as a result of the scheme.

Additionally, a review of the modelling outputs shows unmitigated harm at the following junctions:

- Priors Road / Bouncers Lane
- Prestbury Road / Tatchley Lane / Deep Street / Blacksmiths Lane / Bouncers Lane
- A40 London Road / Old Bath Road / Hales Road

The above junctions should be re appraised and suitability mitigated with a scheme that has the agreement of the Highway Authority. Additionally, a further capacity test is required recognising the lack of local plan designation, the future assessment year should be 2031 to match the local plan assessment period, and all assessment should be undertaken using Temprow 7.2b which is the latest release. This may be best reviewed using the GCC Saturn model.

The applicant has submitted a travel plan to reduce the need to travel and encourage sustainable mode of travel. The applicant has indicated that it their intention for make payment to The Highway Authority to deliver this plan on their behalf, this approach overall is considered to be acceptable. A review of the TP shows that it lacks ambition, the targets are too low and doesn't look to promote personal travel planning as a primary treatment. The travel plan needs to be updated to set an ambitious agenda and series of interventions.

It is therefore necessary for the applicant to review the proposal in light of the above comments and submit a TA addendum and new TP addressing these points.

It is also brought to the applicants attention that Manual for Gloucestershire Streets (July 2020) is available which includes details which may assist the preparation of a TA addendum.

10th February 2021

Gloucestershire County Council, the Highway Authority acting in its role as Statutory Consultee has undertaken a full assessment of this planning application. Based on the appraisal of the development proposals the Highways Development Management Manager on behalf of the County Council, under Article 18 of the Town and Country Planning (Development Management Procedure)(England) Order, 2015 recommends that this application be deferred.

The justification for this decision is provided below.

Page 79

The applicant has provided a TA Addendum (TAA) to which seeks to address the comments dated 17th August 2020. The Highway Authority remains concerned by this proposal and the addendum has not addressed the issues.

The Highway Authority maintains the position that notwithstanding the TA scoping paper the fact that this is not a land allocation in the adopted Joint Core Strategy or Cheltenham Plan means that any development impacts have not been tested along side the planned growth, therefore any proposal beyond that in the adopted plans must be tested over the cumulative impacts that are anticipated. At this time the JCS has a 2031 development timeframe, therefore this proposal must undertake an appraisal in a 2031 future year including the plan identified growth. The application proposes a 2024 appraisal and does not adequately account for that future growth.

Therefore, the conclusions presented underestimate the impact on the highway network.

Response to specific points.

2. Immediate pedestrian / cycle access

The proposal shows shared use facilities but as the primary way in/out of the site and in the surrounding highway network. The application has also stated that it has considered LTN 1/20. The recent publication of LTN 1/20 (section 6.5) considers the use of shared use facilities. The LTN advises that shared use facilities should be regarded as a last resort and it details reason why not least due to difficulties for visually impaired persons and the perception of safety for all users. Therefore, any proposal should account for this document and look to provide facilities which separate pedestrians from cyclists. The proposals on the existing highway network do not achieve this nor does the indicative connection within the site. The proposal therefore fails to provide safe and suitable infrastructure for all users.

3. Immediate Vehicle Access

The TAA provides additional tracking details. It remains the case that the design on the access is not suitable having large radii, excessive road widths and unacceptable gradient. The applicant has not had regard to how the design should reduce speed at entry, instead the proposal will result in a relatively high entry speed onto a setback pedestrian crossing point which would have little inter-visibility. The access does not conform with Manual for Gloucestershire Streets.

The gradient matter is to ensure that pedestrian, cyclists and particularly those with a disability do not have to endure long lengths of a steep slope. The applicant should note the requirement is published in Manual for Gloucestershire Streets as 1 in 12 should not exceed 30m in length, but there are varying guidance in documents such as MfS2, Inclusive Mobility and LTN 1/20. The application shows that there are gradients at the maximum permitted level on this site, it therefore is necessary for areas to be designed in to allow for less mobile people to rest or be provided with addition support. It is recognised that that the internal layout is a reserved matter but the information before us make it a reasonable question to challenge if safe and suitable access can be provided for all users.

5 Off site vehicle mitigation

The applicant has provided further modelling to attempt to demonstrate that there is no severe impact at the junction of Priors Road/Harp Hill/Hales Road/Hewlett Road.

The model has not been constructed in accordance with an agreed scope with the Highway Authority but a review suggested that the base model has been constructed in a suitable manner. However, the traffic count data and queue survey data has not been provided. It is also the case, as previously mentioned, that the assessment does not reflect the plan period and consequently nor does it address committed developments. Even with these omissions the outputs show that the development traffic resulted in increased queue lengths, this was an anticipated outcome and the same conclusion was shown in the junction 9 software. The applicant should also consider the extent of network delay as a

result of this proposal as this data is not presented. This should all be provided for the 2031 future with and without any mitigation.

With regards to the other junctions referred to in tables 5.1 and 5.2, the addendum dismisses the impact on the basis of percentage impact and doesn't look at route choice through the junction, this is not considered to be a fair approach on a congested network and should provide their own junction analysis or microsimulation of the impacts.

6 Travel Plan

It is noted that the applicant has indicated that they wish to pay Gloucestershire County Council to implement and monitor the travel plan. This would need to occur over a longer time period given the likely build out rate of the site. As such a travel plan contribution of £64,500.00 would need to be paid through a planning obligation.

Additionally, the public transport officer has also commented that the site is outside the accepted 400m walking distance to bus stops identified as Priors Rd Oakley 'outside and opposite Sainsbury's' and Whaddon Road 'Community Centre'. These stops are of limited quality and lack shelters in some instances.

In terms of bus timetables, taking into account nearest bus stops, the Priors Rd P&Q timetables are extremely limited and not suitable for commuters. Service A 'Whaddon Road' is the more frequent route but appears residents have farther to walk in order to access. In conclusion for this site to be sustainable there would need to be a great deal of thought given towards bus service provision be that directly through the site or towards improving the existing Services P&Q with subsequent infrastructure improvements at the Sainsbury's stops.

The TA Addendum has not addressed the implications of the site on the transport network and fails to provide a suitable sustainable access strategy. Matters of gradient could potentially be addressed through more significant earthworks but at this time it is not clear that this the case and the gradients are excessive and consequently prohibitive to development. The applicant should provide a comprehensive addendum that addresses the above matters.

The Highway Authority therefore submits a response of **deferral** until the required information has been provided and considered.

1st April 2021

Gloucestershire County Council, the Highway Authority acting in its role as Statutory Consultee has undertaken a full assessment of this planning application. Based on the appraisal of the development proposals the Highways Development Management Manager on behalf of the County Council, under Article 18 of the Town and Country Planning (Development Management Procedure)(England) Order, 2015 recommends that this application is **refused**.

The justification for this decision is provided below.

The Highway Authority has previously recommended that this application be deferred on 2 occasions seeking further clarification on the assessment presented. The applicant has not engaged with the Highway Authority in order to address these issues before submitted further technical notes. Those notes do not address the concerns of the Highway Authority and the reasoning is listed below.

Network wide impact

The applicant has acknowledged the need to consider the impact with the Highway

Page 81

Authority's Saturn model, and now seeks to engage. Whilst this is welcomed the details on how to access this tool have been freely available for the duration of this applications consideration, therefore the applicant is able to commission such services based on the published guidance. It is essential that the applicant provides a suitable appraisal of this site alongside the anticipated local plan sites given it is not allocated and as such impact and infrastructure mitigation for this site has not been accounted for at this stage.

The TA Addendum looked at the percentage impact on some junctions and microsimulation.

Priors Road/Harp Hill/Hales Road/Hewlett Road junction.

Further information has now been provided on the use of the paramics microsimulation model. The conclusion remain the same that there is unacceptable impact which is considered to be severe. The micro simulation tool can help to demonstrate operation usage better than historic junction modelling tools, in the instance of this junction through the TA and TA Addendum both forms of assessment have been undertaken. Both tools focus on this junction and cannot consider any wider reassignment due to the scope of the assessment. Whilst the outcomes should be treated with caution both models show increased delay and queue length in the 2024 scenario and direct mitigation is not proposed.

Priors Road/Bouncers Lane and Prestbury Road/Tatchley Lane/Deep Street/Black Smiths Lane Bouncers Lane junction

The applicant concludes that there is no detriment in 2024, as previously stated this does not capture the full plan period as therefore is an underestimation. The presented table 4 on these junctions does not include the resultant delay, when this is cross referenced again the originally submitted TA the result shows that whilst the queue length is shown to not being excessively long the resulting delay is significant.

A40 London Road / Old Bath Road / Hales Road

The additional technical note does not address this other than suggesting that there is little scope for improvement and suggestion of upgrading the controller unit. The TA demonstrates significant impact to this junction as a result of the proposal. The applicant has suggested that the impact of COVID-19 would result in more flexible and Home working. Whilst this is one scenario the wider implication of the pandemic on travel patterns is not clear. As such reductions in traffic flow for this reason are not accepted.

The TA, TA Addendum and technical note have not addressed the cumulative impact of development and future traffic growth for an appropriate future year. The implications of the development on the network are considered to be severe and consequently conflict with paragraph 109 of the National Planning Policy Framework.

Cycle Infrastructure

The Highway Authority has sought that the proposal complies with LTN 1/20. It is considered that this needs to be split in to the consideration of on site and off site works.

On site works would be a reserved matter and therefore it is not necessary to include this as a refusal point. I would however suggest that the applicant suggestion of a 3m shared facility is not acceptable as shared facilities are now considered to be a "last resort" option.

It has been suggested that offsite mitigation is a reserved matter and could be addressed later. This is not an accepted position. The offsite works would be mitigation to the direct implications of the proposal, should those works be delivered through a planning obligation it would have to be address at this stage, therefore it is illogical to conclude the means of delivery dictates the status of the consideration of the works. The detail around the

assessment of needs and design has not been concluded and it is necessary to ensure that a safe and suitable arrangement is provided.

Immediate access off Harp Hill

This is a matter for consideration at this stage and therefore the suitability of the access needs to be resolved now. Previous comments raised concern about the access width, speeds, and tracking. In response the applicant has indicated that it design to accord with Manual for Gloucestershire Streets requirements, this is clearly incorrect and does not reflect the required standard. The access is excessive and does not convey a design that is conducive to safe and suitable active travel infrastructure. The access and initial street geometry do not reflect the local design guide and does not address the needs to pedestrians or cyclists.

The site gradient remains a concern. Whilst the internal streets are for future consideration the topography of the site provides significant challenges. The desired gradient is 1 in 20, and no steep than 1 in 12, the applicant has provided details of long lengths of 1 in 12.5. The intent of this gradient is to ensure that layouts are suitable for active travel and particularly for those individuals with protected characteristics. The Highway Authority has no confidence that the 1 in 20 gradient can be achieved and based on the information provided that short lengths be provided where it is steeper. As such it does not consider that a future proposal would be unable to achieve a suitable layout.

Travel Plan

The applicant has accepted the travel plan requirements and these need to form part of a suitable legal agreement. This appears to be accepted but not agreement exists at this stage.

Public Transport

Bus stop provision does exceed the nationally accepted thresholds. Therefore, in order to offset this it is normal for distance of up to 800m to be accepted where there is highway links and infrastructure. The applicant that some stops are over 600, and 800m from the centre of the site, this will result in a significant number of households exceeding this upper threshold. Additionally, the route would need to be direct and be a pleasant environment. The applicant has already indicated that they intend to provide a shared walking and cycling environment which is not considered to address the needs for pedestrians or cyclists well. As such the distance to bus stops is unacceptable, the route as indicatively shown is unsuitable, and the stops themselves require enhancement. Mitigation of cycle stands at bus stops is unlikely to be a suitable outcome given the relatively short distances by bicycle and resulting multiple transport choices.

Conclusion

The application is considered to result in a severe impact on the Highway network which is contrary to paragraph 109 of the National Planning Policy Framework, it is also considered to conflict with paragraphs 108 and 110. It also conflicts with INF 1 and INF 4 of the Joint Core Strategy, LTP PD 0.3 and 0.4 of the Local Transport Plan, and Manual for Gloucestershire Streets.

The Highway Authority has undertaken a robust assessment of the planning application. Based on the analysis of the information submitted the Highway Authority concludes that there would be a severe impact and would conflict with the provision of safe and suitable access for all users. Therefore it is recommended that this application is refused.

Battledown Trustees

29th July 2020

This application is yet another attempt to build over irreplaceable green-field pasture land on the edge of Cheltenham, accessed from the already over-used and narrow Harp Hill road.

The two most important of the many reasons we urge the Council to reject this application are:

- 1) This is not a plan-led application and is therefore not in compliance with NPPF requirements. The Cheltenham Local Plan has just been published this month, after years of analysis and debate, and this land is not designated therein for housing development in the foreseeable future;

and

- 2) All this land is within the local AONB and, as such, planners and councillors should be making every possible effort to ensure that there is no development or building of any sort on this land at any time in the future. Land is designated as AONB for a very good purpose, being for the benefit of all future generations, and once built upon can never be recovered.

The combination of the above two reasons is more than sufficient reason to refuse permission. Nevertheless, there are a number of powerful additional reasons to object to this application, viz.:

a) The proposed development will generate many hundreds of extra vehicle movements each day (commuters, school journeys, delivery vans, contractors, shopping trips, etc etc). The only access to the site is via Harp Hill and this road is already over-utilised, recently even more so owing to the new housing development to the north of Hewlett's Reservoir. Harp Hill road is steep and narrow in places (some parts having very poor or non-existent pedestrian pathways), with residential on-road parking between the proposed Site Access point and the B4075 Hales Road/Priors Road junction, such that congestion is already generated in peak hours, leading to lengthy delays. Were the traffic from an additional 250 homes to be added to the existing use, the congestion would become unbearable. Naturally, with such a steep and narrow road, the likelihood of accidents to pedestrians and cyclists would also be increased. Safety concerns alone should mitigate against any planning permission being granted for this land if access is to be via Harp Hill. The only access to Harp Hill road, other than the via the B4075 double-roundabout at the foot of Harp Hill, is through Greenway Lane and Planning Officers / Councillors will be well aware of the already unacceptable level of congestion on Greenway Lane at the Sixways traffic lights during peak hours. This proposed development would only make matters worse.

There are some 30 houses on the Battledown Estate for which Harp Hill is the only access, plus about 100 further houses whose residents make frequent and regular use of the road, so congestion on Harp Hill is a matter of direct relevance to the Trustees and to a significant number of Estate residents.

b) The local schools and GP surgeries are already overloaded, with no spare capacity. There is no provision for a school or a new GP surgery on this site -- so all existing local residents in the Oakley, Battledown and Charlton Kings areas of Cheltenham will suffer, should this application be permitted.

c) The ecological and environmental reasons for refusing this application have already been well-made by many others, so there is no need for us to repeat them here; but that does not diminish their importance.

d) We also object on the grounds that the views of this area of the parish of Charlton Kings as seen from the surrounding Cotswold AONB will be permanently blighted, in contravention of national planning regulations and, in this context, we support the strong objections made by others on similar grounds.

In conclusion, on behalf of the residents of the Battledown Estate we strongly urge you to reject this application.

Cheltenham Civic Society

18th August 2020

OBJECT

Even for an outline application, this lacks detail. There are no elevations, no masterplan. The renewable energy document contains no concrete proposals. The applicant fails to make a case for developing this area of particular importance as part of the Cotswold AONB.

The Civic Society Planning Forum objects to this application as the proposed development is wholly within the AONB and outside Cheltenham's Principle Urban Area. The proposed development would not conserve nor enhance the AONB and would lead to adverse change to the landscape.

Due to its location on the urban fringe of Cheltenham, the Cotswold AONB will continue to come under pressure from developers, which is why the restrictions in line with the NPPF, JCS and Local Plan should be strictly enforced to prevent even small scale developments - let alone larger projects such as the one proposed.

The Forum advocates increased public benefit of this area of the AONB in line with its very special conservation status. Beyond providing visual amenity for its neighbours, this area could provide benefits for the community through access and management for biodiversity. The formation of a trust could help with this process.

GCC Local Flood Authority (LLFA)

24th July 2020

The Flood Risk Assessment and Drainage Strategy document dated March 2020 published by Phoenix Design Partnership identifies the surface and foul water drainage issues associated with development of the site. It proposes a drainage strategy that will ensure that flood risk resulting from rainfall events will be managed on-site and that flood risk will not be increased elsewhere as a result of the development. The strategy is supported by calculations that are considered acceptable by the LLFA.

The LLFA has no objection to the proposal provided any subsequent detailed drainage designs for the development adhere to principles laid out in this drainage strategy. To ensure this happens the LLFA would recommend that any planning consent granted against this application should be conditioned as follows:

Condition:

No building works hereby permitted shall be commenced until detailed plans for surface water drainage works have been submitted to and approved in writing by the local planning authority. The information submitted shall be in accordance with the principles set out in the approved drainage strategy. The submitted details shall:

- i. provide information about the design storm period and intensity, the method employed to delay and control the surface water discharged from the site and the measures taken to prevent pollution of the receiving groundwater and/or surface waters;
- ii. include a timetable for its implementation

Reason:

To ensure that the development is provided with a satisfactory means of drainage as well as to reduce the risk of creating or exacerbating a flooding problem and to minimise the risk of pollution for the lifetime of the development.

Condition:

Prior to the occupation of any building surface water drainage works shall have been implemented in accordance with details that have been approved in writing by the local planning authority. Implementation will include the provision of a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime.

Reason:

To ensure the continued operation and maintenance of drainage features serving the site and avoid flooding for the lifetime of the development

NOTE 1 :The Lead Local Flood Authority (LLFA) will give consideration to how the proposed sustainable drainage system can incorporate measures to help protect water quality however pollution control is the responsibility of the Environment Agency

NOTE 2 : Future management of Sustainable Drainage Systems is a matter that will be dealt with by the Local Planning Authority and has not, therefore, been considered by the LLFA.

NOTE 3: Any revised documentation will only be considered by the LLFA when resubmitted through suds@gloucestershire.gov.uk e-mail address. Please quote the planning application number in the subject field.

Severn Trent Water Ltd

30th July 2020

Thank you for the opportunity to comment on this planning application. Please find our response noted below:

With Reference to the above planning application the company's observations regarding sewerage are as follows.

I can confirm that we have no objections to the proposals subject to the inclusion of the following condition:

- The development hereby permitted should not commence until drainage plans for the disposal of foul and surface water flows have been submitted to and approved by the Local Planning Authority, and
- The scheme shall be implemented in accordance with the approved details before the development is first brought into use. This is to ensure that the development is provided with a satisfactory means of drainage as well as to prevent or to avoid exacerbating any flooding issues and to minimise the risk of pollution.

Severn Trent Water advise that there may be a public sewer located within the application site. Although our statutory sewer records do not show any public sewers within the area you have specified, there may be sewers that have been recently adopted under the Transfer Of Sewer Regulations 2011. Public sewers have statutory protection and may not be built close to, directly over or be diverted without consent and contact must be made with Severn Trent Water to discuss the proposals. Severn Trent will seek to assist in obtaining a solution which protects both the public sewer and the building.

Clean Water Comments

We have apparatus in the area of the planned development, the developer will need to contact Severn Trent Water, New Connections team as detailed below to assess their proposed plans for diversion requirements.

Environment Agency

3rd August 2020

Thank you for referring the above consultation, which we received on 16 July 2020.

As you are aware, we previously provided comments in response to the EIA Scoping Opinion in our letter dated 5 June 2019 (letter reference SV/2019/110277/01-L01).

At that time we did not consider there to be any significant environmental issues within our remit, but provided advice on those matters we felt should be considered either as part of the EIA or in support of any subsequent planning application.

Based on the information submitted, we are satisfied that those issues raised in our response have been addressed as part of the supporting Environmental Statement (ES) or considered within the Flood Risk Assessment (FRA) and Drainage Strategy, dated March 2020, prepared by Phoenix Design Ltd.

Therefore, given the proposed development site is located entirely within Flood Zone 1, (Low Probability of river flooding) we have no objection to the proposed development and have no further comments to add.

Strategic Land Use Team

14th October 2020

Policy considerations in relation to an outline application for development comprising of up to 250 residential dwellings including provision of associated infrastructure.

The site

The application site is situated to the east of Cheltenham town centre on the lower slopes of the Cotswold Scarp at Oakley and is outside of the Principal Urban Area (PUA) and it lies within the Cotswolds Area of Outstanding Natural Beauty (AONB).

Policy Framework

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning decisions should be taken in accordance with the relevant adopted Development Plan unless material considerations dictate otherwise. Therefore, in determining this application, the following must be considered:

The adopted development plan for the area:

- The Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (December 2017)
- The Cheltenham Plan (July 2020)
- Relevant saved policies of the Cheltenham Borough Local Plan Second Review 2006

Relevant material considerations, which include:

- The National Planning Policy Framework (NPPF)
- National Planning Practice Guidance (nPPG)

Policy context

NPPF para. 11(d) provides that, where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, the presumption in favour of sustainable development requires permission to be granted unless either:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed [6]; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Footnote [6] sets out the relevant policies in the NPPF, including policies "relating to ... land designated as ... an Area of Outstanding Natural Beauty".

In *Monkhill Ltd v SSHCLG* [2019] EWHC 1993 (Admin) Justice Holgate provides a useful 15-stage summary of the meaning and effect of NPPF para. 11. The following excerpts are of particular relevance:

5) Where there are relevant development plan policies, but the most important for determining the application are out-of-date, planning permission should be granted (subject to section 38(6)) unless either limb (i) or limb (ii) is satisfied;

8) The object of expressing limbs (i) and (ii) as two alternative means by which the presumption in favour of granting permission is overcome (or disapplied) is that the tilted balance in limb (ii) may not be relied upon to support the grant of permission where a proposal should be refused permission by the application of one or more "Footnote 6" policies. In this way paragraph 11(d) prioritises the application of "Footnote 6" policies for the protection of the relevant "areas or assets of particular importance";

9) It follows that where limb (i) is engaged, it should generally be applied first before going on to consider whether limb (ii) should be applied;

10) Under limb (i) the test is whether the application of one or more "Footnote 6 policies" provides a clear reason for refusing planning permission. The mere fact that such a policy is engaged is insufficient to satisfy limb (i). Whether or not limb (i) is met depends upon the outcome of applying the relevant "Footnote 6" policies

Cheltenham Borough Council cannot currently demonstrate a five year housing land supply so the policies which are most important for determining the application are out-of-date. Limb (i) should then be applied. The guidance above indicates that just because there is a "Footnote 6 policy" (e.g. AONB) it does not follow that the application should be refused. In this case the relevant paragraph to look at is 172 which says:

"Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the

highest status of protection in relation to these issues...Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest."

Therefore the first step in considering this application is determining whether exceptional circumstances exist which outweigh the great weight attached to conserving and enhancing the AONB. This consideration should take into account whether the development is in the public interest. The contribution the site will make towards meeting housing land supply requirements is significant but cannot on its own be an exceptional circumstance.

If this test is passed then limb (ii) will need to be considered. This is a 'tilted balance' in favour of sustainable development. This is a wider balancing exercise which should take into account all relevant national and local policies.

JCS Policy SD7 states that:

"All development proposals in or within the setting of the Cotswolds AONB will be required to conserve and, where appropriate, enhance its landscape, scenic beauty, wildlife, cultural heritage and other special qualities. Proposals will be required to be consistent with the policies set out in the Cotswolds AONB Management Plan."

The Cotswolds AONB Management Plan 2018-23

Policy CE1 of the Cotswolds AONB Management Plan requires:

1. Proposals that are likely to impact on, or create change in, the landscape of the Cotswolds AONB, should have regard to, be compatible with and reinforce the landscape character of the location, as described by the Cotswolds Conservation Board's Landscape Character Assessment and Landscape Strategy and Guidelines.
2. Proposals that are likely to impact on, or create change in, the landscape of the Cotswolds AONB, should have regard to the scenic quality of the location and its setting and ensure that views - including those into and out of the AONB - and visual amenity are conserved and enhanced.

Policy CE2 says:

1. Proposals that are likely to impact on the local distinctiveness of the Cotswolds AONB should have regard to, be compatible with and reinforce this local distinctiveness. This should include:
 - o being compatible with the Cotswolds Conservation Board's Landscape Character Assessment, Landscape Strategy and Guidelines and Local Distinctiveness and Landscape Change;
 - o being designed and, where relevant, landscaped to respect local settlement patterns, building styles, scale and materials;
 - o using an appropriate colour of limestone to reflect local distinctiveness.
2. Innovative designs - which are informed by local distinctiveness, character and scale - should be welcomed.

The Council undertook a review of AONB to support the Cheltenham Plan. This review is published in the Landscape Character, Sensitivity and Capacity Assessment of the Cotswold AONB within Cheltenham Borough (April 2015 / updated May 2016). The application site is situated within site reference LCA 7.1 (Oakley Farm Pasture Slopes).

The report concludes that the overall landscape constraint for the character area is major. It considers the site to have a high visual sensitivity and the landscape value to be high. The resulting overall landscape capacity is 'low'.

This report and its findings are a material consideration in the determination of the proposal. It provides a useful starting point in which to establish whether the development compromises the principles of conserving the landscape and scenic beauty of the AONB.

It is also interesting to note that a section at the far west of the site was not originally included in the AONB designation. It was added in 1990 when boundary amendments took place. This suggests that the overall landscape sensitivity of the site has increased over the years.

Conclusions

It is acknowledged that the proposal would have the effect of increasing the supply of housing land in Cheltenham, but this needs to be weighed against other material considerations, principally the effect of development on the AONB.

The main policy consideration is the need to balance the positive contribution this proposal could make to Cheltenham's housing land supply with the need to give great weight to conserving the Cotswold AONB, which has the highest status of protection in relation to landscape and scenic beauty. Any adverse impact on the AONB as a result of the proposal, which cannot be adequately mitigated, should weigh greatly in the proposal's assessment.

The adopted development plan directs that development should not harm the landscape's natural beauty and JCS Policy SD6 requires that proposals should protect and where appropriate enhance its landscape. Therefore, decision-taker must be satisfied that the application fulfils this.

Joint Waste Team

17th July 2020

- 1 Pathway Pathways need to be of hard standing
- 2 Bins Locations Residents would need to be informed that due to it being private dwellings the ownership would be for them to present on the kerbside for 7am on the morning of collection.
- 3 Road Layout Looking at the masterplan there are no turning areas for big vehicles which poses a risk for damage to verges or even third party vehicles. Parking in the new road will reduce the amount of space to be able to turn a 26 tonne vehicle in. Ideally off road parking is advisable with a turning space for refuse and recycling trucks that is to be kept free on collection days. Ideally double yellow lines to be installed in turning areas
- 4 Road Surface The road surface will need to be of a good surface that will take the weight of a 26 tonne vehicle. Until the road has been completed and passed on, Ubico would need assurances that they are safe to enter and not held responsible for any damage.
- 5 Turning Section The road into the new estate will need turning spaces to allow for a 26 tonne vehicle to turn safely. This would require the road to have adequate measures to prevent parking in these spaces.
- 6 Presentation Points The properties would need a position near the kerbside to present bins, boxes, caddy's and blue bags that would avoid blocking access to the pathway or driveways.
- 7 Storage of bin and boxes for single dwellings Properties need adequate space to store bins and boxes off the public highway when not out for presentation
- 8 Communal If any of the properties are to be communal then a bin shed will need to be planned. The bin shed needs to be of adequate size to house all the

receptacles needed for the occupancy. Ideally the bin shed should be no further than 30 metres away from the adopted highway as per the planning guidance document.

- 9 Entrance to roads Ideally the entrance to the roads will need to have double yellow lines to prevent parking at the junction which causes access issues

Heritage and Conservation

20th October 2020

It is important to consider the policy context in which the proposal needs to be considered. The cornerstone of heritage legislation is the Planning (Listed buildings and Conservation Area) Act 1990, Section 16(2) it states, "In considering whether to grant listed building consent for any works 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."

A core principle of the National Planning Policy Framework 2019 (NPPF) is heritage assets be conserved in a manner appropriate to their significance. Chapter 16, paragraphs 193-196 set out the framework for decision making with applications relating to heritage assets. This assessment takes account of the relevant considerations in this chapter.

Paragraph 192 of the National Planning Policy Framework states, "In determining planning applications, local planning authorities should take account of: the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation." Paragraph 193 of the NPPF requires, "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be)."

Paragraph 194 states, "Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.", with Paragraph 196 of the NPPF stating, "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."

The development site is comprised of agricultural fields with several redundant farm buildings located down a lane off Priors Road. To the immediate southeast of the site is Hewlett's Reservoir. There are a number of heritage assets of note within the reservoir.

No.1 Reservoir and No. 2 Reservoir are largely underground reservoirs. No.1 Reservoir built in 1824, No. 2 Reservoir built later in 1839. Both are designed by James Walker (1781-1862), one of the most distinguished civil engineers of the nineteenth century. The reservoirs are the earliest known surviving example of underground reservoirs. They are both grade II listed.

Besides the reservoirs themselves there are a number of notable historically associated buildings and structures within Hewlett's Reservoir. These include the cast-iron gates, Cotswold stone gatepiers and the brick boundary walls. Gatepiers and gates facing onto Harp Hill, date from 1824, and the boundary wall around Hewlett's Reservoir dating 1824 and circa 1850s. These features are grade II listed. Also notable is an ornamental octagonal pavilion, probably historically a valve house, constructed around the 1870s. The pavilion is grade II listed. Finally there is the Lodge facing onto Harp Hill, the former custodian's house, a date stone on its first floor front elevation dating it to 1824. It is briefly mentioned within the list description for No.1 Reservoir and therefore considered listed through its historic association with Hewlett's Reservoir.

The reservoir complex is described in the list description as forming part of a good group of buildings with group value.

Notable but not considered to be affected by the development proposal due to their distance and intervening modern development are to the south, Hewlett's Camp, a Scheduled Monument and to the north, Bouncer's Lane Cemetery, a grade II listed Park and Garden with a number of associated grade II listed buildings and structures, most notably the Cemetery Chapels.

Also notable and within the development site itself are ridge and furrow fields and several redundant farm buildings associated with the former Oakley Farm, all in a poor condition and some structurally unsound. These agricultural buildings are considered to be of low heritage significance.

The development proposal is an outline application for up to 250 residential dwellings with associated infrastructure, open space and landscaping, demolition of existing buildings and new vehicular access from Harp Hill. All matters reserved except for means of access to site from Harp Hill.

Regarding the development proposal, it is important to note paragraph 193 of the NPPF places great weight on a heritage asset's conservation, with paragraph 194 of the NPPF requiring clear and convincing justification for harm or loss. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset paragraph 196 of the NPPF requires this harm be weighed against the public benefits of the proposal.

An important consideration for the development proposal is its impact on the identified heritage assets in terms of the affect it has on their setting. The immediate setting of Hewlett's Reservoir is rural, defined by tree and hedge lined open fields, with wider views of the suburbs of Cheltenham to the west and open countryside to the east. Its immediate setting is slightly compromised by a modern housing development abutting its northern boundary, an early 2010s redevelopment of the former GCHQ Oakley site. Despite this modern housing development Hewlett's Reservoir retains much of its historic rural setting, maintaining a verdant and open character. It is recognised the application site forms part of the incidental wider rural context of Hewlett's Reservoir and is not part of its curtilage.

It is considered the development proposal will have a harmful impact on the setting of the heritage assets within Hewlett's Reservoir. The development proposal will result in encroachment of built form on the sense of openness that defines how the heritage assets are experienced within their rural setting, intruding into the countryside to the northwest from Hewlett's Reservoir. With the existing adverse impact of the suburban development on the former GCHQ Oakley directly abutting its northern boundary, it is considered the development proposal would have a cumulative adverse impact on the rural setting.

It is noted the plans show an open space to the south of the site, adjacent to Harp Hill. Also notable is the tree lined boundary between the built form of the development proposal and this open space, in addition to other trees and tree groups located along roads and paths which act as screens. This is considered an attempt at allowing some separation between the built form of the development proposal and Hewlett's Reservoir. However, these features are considered inadequate to mitigate the impact of the proposal on the setting of the heritage assets. The open space to the south of the development site and its associated tree screening is not sufficiently large enough to allow a sense of the open countryside character to be retained, its character detrimentally changing from open countryside to an urbanised amenity space with footpaths and access roads, with the tree screening not so dense as to allow the development proposal to be adequately discreet.

The impact of the proposal on the setting of the heritage assets within Hewlett's Reservoir is unacceptable in heritage terms. The proposed works are considered not to sustain and enhance the designated heritage assets. The proposed works are therefore contrary to Section 16 of the Planning (Listed Building and Conservation Area) Act 1990, Chapter 16 of the National Planning Policy Framework and Policy SD8 of the Joint Core Strategy 2017.

It is therefore considered the proposed works would cause less than substantial harm to the significance of the affected designated heritage assets and will therefore need to address the requirements of paragraph 196 of the NPPF. Paragraph 196 of the NPPF states, "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use." It should be noted less than substantial harm is still unacceptable harm.

While it is considered there are public benefits to the proposal, principally through the provision of housing, it is not considered these outweigh the harm caused to the significance of the affected heritage assets. The Planning Officer will need to carry out the exercise of weighing the public benefits of the proposal against the great weight that needs to be given to the affected heritage assets conservation, as required by paragraph 193 of the NPPF. This weighing exercise needs to be a separate to the general planning balance, the two should not be conflated.

Historic England

28th July 2020

Thank you for your letter of 9 July 2020 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Historic England Advice

Due to current restrictions we have not been able to visit the site since receiving the application but on the basis of the information provided we can offer the following definitive advice.

We note that the location of this project is in proximity to a number of sensitive, designated heritage assets. These include:

The Scheduled Monument known as 'Battledown Camp' (National Heritage List for England ref. 1002083); and

Four grade II listed buildings at Hewlett's Reservoir; Reservoirs nos. 1 and 2, the pavilion, and the walls, gatepiers and gates (NHLE ref. 48853, 488556, 488557 and 488567).

The application thus has the potential to impact on the setting of designated heritage assets, possibly leading to a loss of significance. This matter is referred to in paragraphs 190 and 194 of the National Planning Policy Framework.

In our view, the application will result in an impact to the setting of the Scheduled Monument noted above. However, we assess the impact to be at the lower end of the scale referred to in paragraph 193 of the NPPF as 'less than substantial'. It is a matter for the Council to determine if the potential adverse impacts of the application to designated heritage assets may be out-weighed by the potential public benefits, as referred to in paragraph 196 of the NPPF.

While we assess the potential impacts on the scheduled monument to be modest, we note the potential for the proposed development to have a more significant impact on the setting of the adjacent reservoirs and associated features, which were listed at Grade II relatively recently. Impacts on Grade II listed structures are beyond Historic England's statutory remit, and we therefore suggest you consult your internal specialist conservation advisors for their views on how the significance of the Grade II listed structures may be affected by the impact of the proposed development upon their setting.

Recommendation

Historic England has no objection to the application on heritage grounds.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 196 of the NPPF.

Cotswold Conservation Board

14th August 2020

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

The proposed development is located in the Cotswolds Area of Outstanding Natural Beauty (AONB). The purpose of AONB designation is to conserve and enhance the natural beauty of the AONB. Whilst the Board recognises that the AONB is a living and working landscape, development in the AONB should be consistent with – and help to deliver – the purpose of AONB designation.

The Board objects to the proposed development, for the reasons outlined below, and recommends that it should not be granted planning permission.

We consider that the proposed development would constitute major development, in the context of paragraph 172 and footnote 55 of the National Planning Policy Framework (NPPF), by reason of its nature, scale, setting and potential to have significant adverse impacts on the purpose of AONB designation.

The site is located in the highly sensitive landscape of the Cotswold escarpment, which is one of the 'special qualities' of the AONB. The newly adopted Cheltenham Plan states that it is particularly important to protect the escarpment as the dominant feature of Cheltenham's setting and expressed concern at the cumulative impact of even small-scale development (let alone a development of 250 dwellings).

The Board considers that the site, in its current form, clearly merits its AONB status because the quality and character of the landscape at the site is unimpaired by its proximity to urban development and is commensurate with the landscape quality in other parts of the Cotswolds AONB. The site is highly visible and prominent feature when seen from nationally, regionally and locally important viewpoints, in particular the Cotswold Way National Trail. It provides an important 'green wedge' that extends the natural beauty of the Cotswolds AONB landscape into the urban area of Cheltenham.

We acknowledge that the southern edge of the site would remain undeveloped. However, even with this mitigation in place, the development would still result significant adverse effects on many of the landscape and visual features and characteristics that make this site so special. Given the elevation of many key viewpoints on the escarpment, other measures, such as planting new hedges and trees are unlikely to provide significant mitigation.

The Board also considers that the development is likely to have significant adverse impacts on the tranquillity of the Cotswolds AONB (which is another of the AONB's special qualities), particularly with regards to the number of vehicle movements on roads in – and

directly adjacent to – the AONB. We also consider that there would be adverse impacts on the setting of the listed buildings of Hewlett's Reservoir.

The starting point for decisions relating to major development is a presumption against granting planning permission. For such development to be approved, it would need to be demonstrated that exceptional circumstances apply and that the development would be in the public interest. However, the Board does not consider that these thresholds have been met.

The Board's recognises that there is a need for new housing in Cheltenham and other settlements. However, the need for this specific development proposal clearly relates to needs arising outside the AONB. As stated in Government guidance, AONBs are unlikely to be suitable areas for accommodating unmet needs arising in areas outside the AONB. Government guidance also indicates that the scale and extent of development in AONBs should be limited.

There is very little housing within the Cheltenham section of the AONB. As such, there is also likely to be very little need for new housing arising within this section of the AONB. Any such housing need is already likely to be met by the new housing in the south east corner of the Oakley Grange development and by other permitted development within the AONB. Consideration of 'public interest' should take into account the fact that AONBs are areas whose distinctive character and natural beauty are so outstanding that it is in the nation's interest to safeguard them.

[The Board's full response and supporting appendices are available to view via the Council's website.](#)

County Archaeology

24th July 2020

I note that the application is supported by a Geophysical Survey Report (SUMO, May 2019), Archaeological Desk-Based Assessment (CGMS, July 2019) and an Archaeological Evaluation report (Worcestershire Archaeology, December 2019). The latter report concludes that the site produced a single dated archaeological feature, a small gully that contained a small amount of later prehistoric pottery. A few other widely separated and undated features were recorded. The report concludes that the lack of density of features indicates outlying activity away from any settlement foci.

In the light of the above, there is a low risk that significant archaeological remains will be adversely affected by this development proposal. Therefore, I recommend that no further archaeological mitigation or recording need be undertaken in connection with this scheme.

Campaign to Protect Rural England

14th August 2020

CPRE objects to the above application for the reasons set out below.

The Planning Context

The application is for a major development on a site in the Cotswolds AONB on the periphery of, but outside, the Cheltenham PUA. The NPPF 2019 (paragraph 172) states that:

"Great weight should be given to conserving and enhancing landscape and scenic beauty in ... and Areas of Outstanding Natural Beauty, which have the highest status of protection

... The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated."

The need to protect the AONB is reflected in the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy to 2031 (the JCS) in which Policy SD7 states: "All development proposals in or within the setting of the Cotswolds AONB will be required to conserve and, where appropriate, enhance its landscape, scenic beauty, wildlife, cultural heritage and other special qualities. Proposals will be required to be consistent with the policies set out in the Cotswolds AONB Management Plan."

The Cheltenham Local Plan, which was adopted in July 2020 and is fully consistent with the JCS, contains the following in amplification of Policy SD7:

8.3. Because of its attractive character, which derives from its built form as well as the landscape of the scarp edge, and its location on the urban fringe, the AONB in the Borough is particularly sensitive to development pressures. A restrictive approach is therefore necessary to conserve and enhance both of these elements. The Council considers it particularly important to protect the scarp as the dominant feature of Cheltenham's setting and is concerned at the cumulative effect of even small-scale development and of development in new locations within the AONB.

8.4. In assessing proposals for development, the Council will be guided by Paras. 115 and 116 of the National Planning Policy Framework (NPPF)*, Policy SD7 of the Joint Core Strategy (JCS) and the advice of the Cotswold Conservation Board with reference to the latest iteration of the Cotswold AONB Management Plan.

(* Note that the Cheltenham Plan above refers to paragraphs in the 2012 version of the NPPF.)

JCS Policy SD7 is strongly supported by the Cotswold AONB Management Plan, which deals in considerable detail with the Cotswold scarp. The site is located in Local Character Area (LCA) 2D, Coopers Hill to Winchcombe, one of seven such areas covering the scarp slope from Bath to Edge Hill. In a table, the column headed Local Forces for Change, the Plan refers specifically to LCAs 2A (including Bath) and 2D (including Cheltenham) as those adjacent to by far the two largest settlements located close to the scarp and where, at least by implication, pressures for development are greatest. The two other columns are headed Potential Landscape Implications and Landscape Strategies and Guidelines. In the former, CPRE considers the first, fourth, fifth and ninth bullet points, covering encroachment of built development, proliferation of suburban building styles, spread of lit elements and degradation of views to be particularly important. In the latter, the first second, seventh ninth and thirteenth bullet points, covering the maintenance of open character, intrusive development, layout and design, styles and materials, and light pollution are factors which would militate against the development of this site, even in principle.

In accord with the above policies, the proposed site is NOT allocated for development in the Cheltenham Local Plan.

Housing Land Supply

The applicant argues that, because Cheltenham is currently unable to demonstrate a 5-year housing land supply, the exceptional circumstances of NPPF paragraph 172 apply. However, to make such an exception only a matter of weeks after the Cheltenham Local Plan has been adopted is demonstrably contrary to the spirit and purpose of the planning system as embodied in the NPPF. The calculation of housing land supply is highly variable and depends on many factors outside the planning authority's control, not least the willingness of developers to build out those sites which already have planning permission. Given the many other arguments against a major development on this site, this is an aspect which should attract little weight.

We note that the most recent assessment shows that Cheltenham Borough has a 3.7 year supply of land for housing, compared with 4.6 years in the previous assessment. This decline is explained mostly by the fall in the number of dwellings available in the five-year period under review, from 3,104 to 2,265, or 27%. This in turn is nearly all explained by the fall in the anticipated yield of the strategic sites, West Cheltenham and North West Cheltenham, parts of which lie in Tewkesbury Borough. Cheltenham Borough Council has no control at all over the progress of sites outside its administrative area.

CPRE is not attempting to argue that more dwellings are likely to be built, on these two sites in particular, than the Borough Council predicts. Rather, the issues are these, based on the specific circumstances of Cheltenham and its environs: first, the weight that should be attached to five year supply in decision making; secondly, the way in which the five year supply has been calculated in the JCS area.

In respect of the first issue, CPRE has been concerned for some time about the weight carried by housing land supply in decision making at the expense of other important considerations. The Government attaches great importance to the plan-led system. The dominance of five year supply issue, however, has the effect of undermining it, in that if fewer dwellings are forecast to come forward on allocated sites, then this can (and often does) lead to the release of unallocated sites. The planning system takes the contribution of windfall sites appropriately into account; but these are by definition sites which could not reasonably be identified in advance and allocated in a development plan. However, in this particular case development on a very substantial scale is proposed. The effect of this in the long term in some areas (Cotswold District is a good local example) might be more housebuilding than the development plan provides for. This is not necessarily a bad thing; indeed, we acknowledge that fewer houses overall are being built than the nation requires. (There are issues also of whether the housing which is being provided is of the right type or in the right location.) Rather, the issues relate to the specific harms which may arise from the release of particular sites and the general effect on the pattern and distribution of development and its sustainability.

The Cheltenham Plan shows that potential supply exceeds the OAN of 10,917 dwellings by a comfortable margin. The 2018 five year supply assessment supposedly includes an appendix containing a legal opinion on whether the Plan could be submitted for Examination in the absence of a five year supply. Although this appendix is missing from the CBC website, the very fact that the Plan underwent Examination indicates what that opinion was. Furthermore, the Plan was found sound subject to Modifications which did not directly concern this issue. The Inspector had this to say at paragraph 53 of the report on the Examination: "In these circumstances it is not a matter for the Cheltenham Plan to demonstrate the provision of a five year supply of housing land", and at paragraph 56, "the availability and deliverability of the sites identified for housing in the Cheltenham Plan have been tested through the examination process".

Turning to the second issue, CPRE has also been concerned about the way in which the five year supply has been calculated from the time of the JCS Examining Inspector's Interim Report in 2016 onwards. There has been no adequate written explanation of justification of this approach anywhere. CPRE is not aware of a Committee resolution in

any of the three constituent authorities. Although there is nothing directly in the NPPF or PPG to prevent this approach, there is nothing to support it either. In the Borough Council's own documents, it is inadequate to say, as paragraph 12 of the December 2019 Position Statement does, "the following method of calculating the five year housing land supply for Cheltenham was discussed at the Examination in Public of the JCS and was found sound by the Inspector...".

CPRE would have carried out its own assessment based on the Borough Council's boundaries but the presentation of the data in the main planning documents is so poor that this cannot be done. We would urge the Borough Council to carry out such an assessment.

Landscape Impact

This greenfield site occupies rising open ground on a shoulder of the Cotswold escarpment. The upper part is readily visible from other parts of the escarpment, notably from Cleeve Common, from sections of the Cotswold Way and from other public rights of way. The wider site is also visible from the footpath which borders the western edge of the site and from the upper part of Harp Hill, from which there are extensive views of the escarpment towards Cleeve Hill.

The site has formed an integral part of the Cotswolds AONB since its designation in 1966. Its continued inclusion was confirmed in 1990 following the AONB boundaries review. Throughout that time, the brownfield land to the North of the site was occupied by the many and varied buildings of GCHQ. These were more intrusive into the landscape than the residential development which now occupies the site. It is not therefore a sustainable argument that the landscape value of the site has been reduced by this adjoining residential development.

In 2015, Cheltenham Borough Council commissioned a Landscape Character, Sensitivity and Capacity Assessment of the Cotswolds AONB within its administrative area. The result of this review - the Ryder Report - designated the application site area as Site Ref: LCA 7.1, Oakley Farm Pasture Slopes. In all three categories of assessment: Visual Sensitivity, Landscape Character Sensitivity and Landscape Value; this site was classified as High. The landscape capacity for development was thus assessed as Low. There has been no material change to the nature of the site since this assessment was carried out.

It is accepted that limiting housing development to the lower parts of the site would reduce the damage caused to the landscape. However, the proposal provides for the only major vehicle access to and from the site to be from near the top of Harp Hill. This access in itself would cause extensive damage to the landscape, including changing it from rural to suburban in character.

Transport and Access Issues

The proposal provides cycle and pedestrian access to existing development to the west and to Priors Road, thus enabling access to local services and buses along Priors Road. But, apart from for emergency vehicles, the only vehicle access is from near the top of Harp Hill. Unless there is a good buses service serving the site itself, those unable to walk or cycle a reasonable distance would rely on private transport, as Priors Road is some distance, especially from the Easterly part of the site.

Whatever the claims otherwise, it is inevitable that in a development of this layout and scale extensive use will be made of private transport both for local journeys and for travel further afield.

Harp Hill, with connecting Greenway Lane, Aggs Hill, Mill Lane and Ham Road are minor roads in the AONB which already become congested, especially at peak times, by traffic between the northern part of Cheltenham and Charlton Kings, the east and south. In particular, there is traffic to and from Glenfall Primary School and Balcarras Secondary

School. For this reason, the recent residential development at the top of the former GCHQ site (Eden Villas), which has vehicle access onto Aggs Hill, was limited to only 40 dwellings. Lower parts of the GCHQ site are accessed from Priors Road. A vehicle access to the application site near the top of Harp Hill would cause excessive further traffic congestion.

Social Cohesion

While there are limited non-vehicle connections to the adjoining residential site to the west, there is only one vehicular access. As the illustrative masterplan shows, the geography and layout of the application site are in consequence insular in nature. This will lead to any development being cut off from the adjacent built up area with poor social integration with the rest of the town.

The Planning Balance

The benefits of providing of a further 250 dwellings towards meeting Cheltenham's housing requirement, with attendant construction and occupancy economic benefits would be more than outweighed by:

- The damage caused to the local landscape which lies entirely within the Cotswolds AONB
- The disregard of statutory planning policies enshrined in the NPPF, the JCS and the Cheltenham Local Plan. The credibility of the Cheltenham Local Plan, which was only adopted in July 2020 would be particularly damaging.
- The serious impact of the resultant additional traffic on local roads, especially on minor roads within the AONB.
- The creation of another isolated local community.

CPRE urges Cheltenham Borough Council to refuse this application.

Ecologist

23rd October 2020

I have reviewed the Ecology aspects of the Environmental Impact Assessment that includes Preliminary Ecological Appraisal (including bat roost inspections, hedgerow regulation surveys), reptile surveys, breeding bird surveys, bat activity and emergence surveys.

No badger setts or reptiles were recorded on the Site. Precautionary measures to avoid trapping badgers or small mammals such as hedgehogs should be considered including putting ramps in any trenches/holes that are excavated.

No mention of hedgehogs (a NERC Priority Species) is made, it is considered likely that they could be present and considering the endangered status of this species, mitigation is required. For example, the aforementioned ramps for trenches/holes, 13x13cm holes created at base of fences to allow permeability for hedgehogs, ecological checking of any piles of logs/brush/rubble before clearance.

The variety of bird species recorded using the site were not considered to be 'remarkable' with low numbers of notable breeding bird species, including house sparrow, willow tit, dunnock and bullfinch. However, a variety of bird species were recorded and therefore mitigation and enhancements for birds is required. It is noted that the bird breeding season is stated as March to July in the report, this needs extending to March to August as the period when works to trees, shrubs and hedgerows should be avoided due to the risk of disturbing nesting birds.

The majority of bat activity across the site was recorded from common pipistrelle bats, with less activity recorded from Myotis species, lesser horseshoe bats, soprano pipistrelle,

Page 99

Nyctalus species., brown Long-eared, Nathusius' pipistrelle, barbastelle and serotine. One mature oak tree functioned as a summer day roost used by a single noctule bat in the north of the Application Site and this appears to be retained in the development plans. The tree and its root protection zone must be protected during development and landscaping. This bat roosting tree must not be illuminated as this will deter bats from roosting in future.

Should this tree require tree surgery/removal in the future, then it will be necessary to undertake update bat surveys to confirm level of usage and inform a Natural England licence application. However, its retention is both welcomed and recommended.

In general, bats use most of the hedgerows within the Application Site to varying degrees throughout the year with areas of greater registrations at the crossing point of H3 and H1 along hedgerows and trees associated with the demolished farm building B1, along H7-H11, along the northern section of H9 (just before crossing point of H9 and H12), at the crossing point of H2 and H2a. Lower numbers of bat registrations were recorded along H1, H2a, H5, H6 and along the north-western (H2a and H3), north-eastern and eastern boundary of the Application Site. The hedgerow retention plans broadly appear to reflect the hedgerows most frequently used by bats as foraging/commuting corridors. It is essential that these areas are not illuminated, and this should be reflected in the site lighting plan, particularly as the site currently supports particularly light adverse species such as lesser horseshoe, barbastelle, brown long-eared bats and Myotis species.

It appears from the plans that the trees identified as containing suitable bat roosting features will be retained. It is important that the trees and their root protection zones are protected during development and landscaping. These trees should not be illuminated. Should it be necessary to undertake tree surgery/remove any of these trees, then update surveys will be necessary to confirm whether bat are roosting or not currently.

Mitigation measures for the aforementioned species should be detailed in a Construction Ecology Management Plan. This should include a lighting plan for the site detailing lux levels and light spill as well as lighting types to use. Lighting recommendations for bats (in terms of lux levels and lighting types) should be followed.

The development will result in the loss of some mature hedgerows and semi-improved grassland (plus areas of grassland with greater species diversity). The veteran trees appear to be retained in the development proposals, which is welcomed. However, care needs to be taken to ensure that both veteran trees and their root protection zones are protected during development and landscaping. The planting of native trees and shrubs, native hedgerows and wildflower grassland plus a naturalised SUDS feature is welcomed. Care needs to be taken when seeding areas with wildflower and native grass seed that the underlying soil is suitable and if not, then appropriate measures need to be taken to ensure that the wildflower habitat can establish. Details of implementation and management of the planting scheme should be included in a 10-year Landscape and Ecology Management plan for the site. This plan will include details of enhancement measure for relevant wildlife (e.g. bird/bat boxes, hibernacula, hedgehog shelters).

National Planning Policy Framework (NPPF) and Local Plan Policy (Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011 - 2031) (adopted December 2017)

Context:

NPPF Para 170 - 177 (Conserving and Enhancing the Natural Environment), National Planning Policy Framework
SD9 Biodiversity and Geobiodiversity
INF3 Green Infrastructure

Wildlife legislation context:

Wildlife and Countryside Act 1981 (as amended)
Conservation of Habitats and Species Regulations 2017

Habitat Regulations Assessment (HRA)

Due to the nearness of the development to Cotswold Beechwood SAC, a shadow HRA is necessary. This particularly needs to address recreational pressures on the SAC. The applicant has provided a shadow HRA to assess the impact of the development on these SAC.

The shadow HRA prepared by Ecology Solutions in December 2019, concluded that based on the 8.7km distance between the site and the Cotswold Beechwoods SAC and the number of alternative recreational resources that are closer to the site, it follows that there would not be any likely significant effects on the Cotswold Beechwoods SAC, either alone or in combination with other plans or projects, resulting from the proposed development at the Land at Oakley Farm. However, as an additional measure to further minimise any impact, the applicant will provide Homeowner Information Packs (HIPs) to new residents. The HIP should include information to make new residents aware of local green space options as well as the sensitivities of nearby sites of nature conservation concern including Cotswold Beechwoods SAC and how to act responsibly to avoid disturbing wildlife (including: residents should be advised to keep dogs on leads at the aforementioned sites and recommendation to keep cats in at night to reduce hunting pressure on wildlife). A map of alternative public open spaces including those in the development and their foot/cycleway links plus public transport links needs to be included along with guidelines on wildlife gardening and leaving the pre-cut 13x13cm hedgehog tunnels in fences to allow hedgehog movement across the estate. As such, based on the information presented above it is considered that the development proposals at the Land at Oakley Farm would not likely affect the integrity of the Cotswold Beechwoods SAC either alone or in combination with other development, thus meeting the test of the Habitats Regulations 2017.

Conclusion & Recommendations

1. The mitigation measures in the Ecology reports and in this document should be expanded on in the form of a Construction Ecological Management Plan (CEMP), which should include a lighting plan. The CEMP needs to be submitted to the local planning authority for approval prior to determination. A copy of the approved CEMP needs to be given to the contractors on site to ensure that everyone involved is aware of the requirements to protect wildlife and habitats.
2. The enhancement measures in the Ecology reports and Landscape Strategy need to be expanded on in the form of a Landscape Ecological Management Plan (LEMP) with should be applicable for a minimum period of 10 years and include monitoring regime to ensure habitats establish well and animal shelters remain in good state. The LEMP needs to be submitted to the local planning authority for approval prior to determination.
3. Homeowner Information Packs must be given to all residents at the proposed development. These packs should contain the information outlined above. A sample Homeowner Information Pack must be submitted to the Local Planning Authority to review and approval be obtained prior to first occupation and delivery to new homeowners of the development.
4. The development needs to show a positive Biodiversity Net Gain (BNG), which should be calculated using the DEFRA Metric and the results submitted to the planning authority for approval prior to determination. (Should the development not show a positive BNG, then the landscaping plans may need revising and if insufficient land can be used as greenspace on site then additional greenspace land may need to be found)

23rd October 2020

HRA extract available to view in Documents tab.

6th April 2021

I have reviewed the BNG report, CEMP and LEMP plus lighting plan provided by the applicant. The CEMP and LEMP together give sufficient level of detail as to how the ecological features on site will be protected and specify the ecological enhancement opportunities, which are shown on the landscape plans. However, I note that no mention of hedgehog tunnels built into base of fences is mentioned, this needs to be added to the CEMP/LEMP to ensure connectivity for hedgehogs across the site.

The Biodiversity Net Gain (BNG) report demonstrates that the development with its landscape and planting plan can achieve positive biodiversity net gain, which is welcomed. I recommend that the development proceeds in accordance with the guidance/recommendations given in these documents and shown on the landscaping/lighting plans and this should be conditioned.

Natural England

3rd September 2020

Comments available to view on line.

SUMMARY OF NATURAL ENGLAND'S ADVICE OBJECTION

Natural England objects to this proposal. As submitted we consider it will:

- have a significant impact on the purposes of designation of the Cotswolds AONB.

Natural England's further advice on designated sites and advice on other natural environment issues is set out below.

We have reached this view for the following reasons:

- The proposed development comprises a major residential development within the Cotswolds Area of Outstanding Natural Beauty.
- The proposed development has significant landscape and visual impacts on the AONB.
- The application site is not allocated in the adopted local plan.

Natural England has visited key viewpoints overlooking the application site and has the following advice:

The proposed development is for a site within a nationally designated landscape namely the Cotswolds AONB. The statutory purpose of the AONB is to conserve and enhance the area's natural beauty. Relevant to this is the duty on public bodies to 'have regard' for that statutory purpose in carrying out their functions (S85 of the Countryside and Rights of Way Act, 2000).

Your decision should be guided by paragraph 172 of the National Planning Policy Framework which gives the highest status of protection for the 'landscape and scenic beauty' of AONBs and National Parks. For major development proposals paragraph 172 sets out criteria to determine whether the development should exceptionally be permitted within the designated landscape.

Alongside national policy you should also apply landscape policies set out in your recently adopted Cheltenham Borough Plan. We note your adopted plan's specific reference to the impacts of development on the escarpment at paragraph 8.3.

We note and agree with the detailed objection response submitted by the Cotswolds Conservation Board. Their knowledge of the site and its wider landscape setting, together with the aims and objectives of the AONB's statutory management plan, provide a

fundamental contribution to the planning decision. The local Landscape Character Assessment provides a helpful guide to the landscape's sensitivity to this type of development and its capacity to accommodate the proposed development.

Following a site visit to view the application site from key viewpoints on the Cotswold Scarp (Cotswold Way National Trail) and taking in the Cheltenham Circular Footpath Natural England has concluded that the application is likely to:

(i) Cause significant landscape impacts through the loss of open pasture on the application site and its replacement with an urban settlement form on sloping land.

(ii) Prove very hard to mitigate with the proposed use of additional green infrastructure due to:

a. the timescales associated with hedgerows and trees achieving a reasonable degree of screening and/or filtering.

b. The sloping topography of the site together with the extent and height of the proposed housing is unlikely to allow effective mitigation even in the longer term.

(iii) Taking account of the challenges associated with effective mitigation described above the significance of medium and longer term effects on visual amenity from various locations along the Cotswold Way National Trail is likely to be greater than that described in the submitted Environmental Statement's landscape and visual impact assessment (LVIA)1.

Designated Sites – further information required

Notwithstanding our objection on landscape grounds the following advice also applies with regard to designated sites:

European sites

As submitted, the application could, in combination with other new residential development in the Council's area, have potential significant effects on The Cotswolds Beechwoods Special Area of Conservation (SAC). Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation

The application site is within a zone of influence around a European designated site (also commonly referred to as Natura 2000 sites), and therefore has the potential to affect its interest features. European sites are afforded protection under the Conservation of Habitats and Species Regulations 2017, as amended (the 'Habitats Regulations'). The application site is within 9Km of the Cotswolds Beechwoods Special area of Conservation (SAC) which is a European site. The site(s) is also notified at a national level as the Cotswold Commons & Beechwoods Site of Special Scientific Interest (SSSI) and National Nature Reserve (NNR). Please see the subsequent sections of this letter for our advice relating to SSSI features.

In considering the European site interest, Natural England advises that you, as a competent authority under the provisions of the Habitats Regulations, should have regard for any potential impacts that a plan or project may have.

Natural England advises that an Appropriate Assessment should now be undertaken, and the following information is provided to assist you with that assessment.

Policy SD9 'biodiversity geodiversity' of the adopted Gloucester, Cheltenham and Tewkesbury JCS and Cheltenham policy BG12 refer. Our advice letter dated 22.8.18 provides further baseline information³. Most recently a visitor survey of the SAC has been published⁴ indicating a 15km zone from within which visitors travel to the site, most often by private car. Work has been commissioned by the collaborating Local Planning Authorities to identify suitable mitigation measures within the zone. Until those measures

have been identified and agreed we advise that the following should be considered in an HRA when determining applications for residential development within the zone of influence:

- Distance between application site and nearest boundary of SAC
- Route to SAC/mode of transport
- Type of development (E.g. use class C3)
- Alternative recreation resources available – on site and off site
- Education and awareness raising measures – e.g. Suitable information in the form of a Homeowner Information Pack.

Please re-consult Natural England when your appropriate assessment is available.
Sites of Special Scientific Interest (SSSI)

The following SSSIs with public access lie within 5 km of the application site:

- Cleeve Common
- Leckhampton Hill & Charlton Kings common
- Puckham woods
- Lineover Wood

The Cotswold Commons and Beechwoods SSSI and National Nature Reserve (NNR) also partially coincides with the Cotswold Beechwoods SAC.

The information used to carry out the HRA (appropriate assessment) of the Cotswold Beechwoods SAC is also likely to provide a suitable basis for consideration of impacts and suitable mitigation in respect of additional recreation pressure on these SSSIs. Provided that suitable information is submitted and subject to assessment as described above we do not anticipate the development having adverse effects on the notified features of these SSSIs.

Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 28I (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence.

Other advice

Further general advice on the protected species and other natural environment issues is provided at Annex A.

Should the developer wish to explore options for avoiding or mitigating the effects described above with Natural England, we advise they seek advice through our Discretionary Advice Service. Should the proposal change, please consult us again.

If you have any queries relating to the advice in this letter please contact Antony Muller on 07554 459452.

13th April 2021

Thank you for your consultation on the above dated 09 April 2021 which was received by Natural England on the same day. This letter provides our advice on the submitted shadow HRA. Please refer to our previous advice letter in respect of other matters within our remit.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE:

HABITATS REGULATIONS ASSESSMENT - NO OBJECTION - SUBJECT TO APPROPRIATE MITIGATION BEING SECURED

We consider that without appropriate mitigation the application would, in combination with residential and tourist related development in the wider area:

- (i) have an adverse effect on the integrity of the Cotswold Beechwoods Special Area of Conservation <https://designatedsites.naturalengland.org.uk/>.
- (ii) damage or destroy the interest features for which the Cotswolds Commons and Beechwoods Site of Special Scientific Interest and neighbouring SSSIs in the area with public access have been notified (please see overleaf).

In order to mitigate these adverse effects and make the development acceptable, the following mitigation measures are required / or the following mitigation options should be secured:

- Homeowner Information Packs providing information on recreation including both opportunities for visits in the area and the sensitivities of local and designated sites.

We advise that an appropriate planning condition or obligation is attached to any planning permission to secure these measures.

Further advice on mitigation

Policy SD9 'biodiversity geodiversity' of the adopted Gloucester, Cheltenham and Tewkesbury JCS and Cheltenham policy BG1 refers. Our advice letter dated 22.8.18 provides further baseline information. Most recently a visitor survey of the SAC has been published indicating a 15.4km zone from within which visitors travel to the site, most often by private car. Work has been commissioned by the collaborating Local Planning Authorities to identify suitable mitigation measures within the zone. Until those measures have been identified and agreed we advise that the following should be considered in an HRA when determining applications for residential development within the zone of influence:

- Distance between application site and nearest boundary of SAC
- Route to SAC/mode of transport
- Type of development (E.g. use class C3)
- Alternative recreation resources available – on site and off site
- Education and awareness raising measures – e.g. Suitable information in the form of a

Homeowner Information Pack.

Natural England notes that the submitted Habitats Regulations Assessment (Including stage 2 - Appropriate Assessment) has not been produced by your authority, but by the applicant. As competent authority, it is your responsibility to produce the HRA and be accountable for its conclusions. We provide the advice enclosed on the assumption that your authority intends to adopt this appropriate assessment to fulfil your duty as competent authority.

The shadow appropriate assessment concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question. Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal, Natural England advises that we concur with the assessment conclusions, providing that all mitigation measures are appropriately secured in any permission given.

In terms of format the Homeowner Information Pack should present information describing informal recreation opportunities in the following sequence:

- Public space on your doorstep
- A short drive by car or bus
- Further afield – e.g. The Cotswolds, the Severn Estuary, the Forest of Dean.

The proposed HIP leaflet for Hunts Grove, Quedgeley (produced by Crest Nicholson. Gloucester City Council and FPCR provides a useful example).

Sites of Special Scientific Interest (SSSI) - No objection subject to mitigation

A number of SSSI with public access lie either close to the application site or between the application site and the Cotswold Beechwoods SAC:

- Cleeve Common
- Leckhampton Hill & Charlton Kings Common
- Crickley Hill and Barrow Wake

The SAC also partially coincide with the Cotswold Commons and Beechwoods SSSI and National Nature Reserve (NNR). Provided that the proposed Homeowner Information Pack ensures these SSSIs' sensitivities are included within the document we do not anticipate the development having adverse effects on the notified features of these SSSIs.

Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 28I (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence.

For any queries regarding this letter please contact me on 07554 459452. For new consultations, or to provide further information on this consultation please send your correspondence to consultations@naturalengland.org.uk.

We would not expect to provide further advice on the discharge of planning conditions or obligations attached to any planning permission. Should the proposal change, please consult us again.

GCC Community Infrastructure Team

21st August 2020

Summary: Contributions will be required to make the development acceptable in planning terms

Please refer to GCC Commissioning for Learning Report dated 06/08/2020 for detailed assessment of the impact of this proposal on Education infrastructure and the necessary S106 requirements to mitigate the impact if planning permission is granted.

Supporting Education Information:

- The School Place Strategy 2018-2023 (SPS) is a document that sets out the pupil place needs in mainstream schools in Gloucestershire between 2018 and 2023. The SPS examines the duties placed upon GCC by the Department for Education (DfE) and it explains how school places are planned and developed.

<https://www.gloucestershire.gov.uk/media/2085281/gloucestershire-school-places-strategy-2018-2023-final-web.pdf>

- Place Cost Multipliers - The DfE have not produced cost multipliers since 2008/09, so in the subsequent years we have applied the annual percentage increase or decrease in the BCIS Public Sector Tender Price Index (BCIS All-In TPI from 2019/20) during the previous 12 months to produce a revised annual cost multiplier in line with current building costs, as per the wording of the s106 legal agreements. We calculate the percentage increase using the BCIS indices published at the start of the financial year and use this for all indexation calculations during the year for consistency and transparency.

- Pupil Yields - GCC is using the updated Pupil Yields supported by two studies in 2018 and 2019. The updated pupil product ratios (PPR) for new housing are; 30 pre-school children, 41 primary pupils, 20 secondary pupils and 11 post-16 pupils per 100 dwellings. All data/research produced is available from:

<https://www.gloucestershire.gov.uk/media/2093765/gloucestershire-county-council-ppr-report-703.pdf>

- This application has been assessed for impact on various GCC community infrastructures in accordance with the "Local Developer Guide" (LDG) adopted 2014 and updated 2016. The LDG is considered a material consideration in the determination of the impact of proposed development on infrastructure. <https://www.gloucestershire.gov.uk/planning-and-environment/planning-policy/gloucestershire-localdeveloper-guide-infrastructure-and-services-with-new-development/> The LDG is currently being updated and will include the most up-to-date PPR, which have changed since 2016 as a result of the Pupil Yield studies carried out in 2018 and 2019.

- This assessment is valid for 1 year, except in cases where a contribution was not previously sought because there were surplus school places and where subsequent additional development has affected schools in the same area, GCC will reassess the Education requirement.

- Any contributions agreed in a S106 Agreement will be subject to the appropriate indices.

Site Specific Assessment of Library Provision Requirements:

The nearest library is Oakley Library

Detailed guidance within the GCC Local Developer Guide (LDG) states that:

"New development will be assessed by the County Council to determine whether it will adversely impact on the existing provision of local library services. In doing so careful consideration will be given to current levels of provision compared against the nationally recommended benchmark of the Arts Council - formerly put together by Museums, Libraries and Archives Council (MLA)".

The scheme will generate additional users who will need for Library resources calculated on the basis of £196.00 per dwelling:

A contribution of £49,000.00 (250 dwellings x £196) is therefore required to be used at Oakley Library to make this application acceptable in planning terms, in accordance with the GCC LDG, Library Strategy and national guidance.

The nationally recommended benchmark is now available in the publication Public Libraries, Archives and New Development A Standard Charge Approach (May 2010). It sets out a recommended library space provision standard of 30 sq metres per 1,000 population. This is costed at £105 per person. The current GCC figure of £196 reflects the uplift in costs since 2010.

In accordance with the Library Strategy ("A Strategy for Library Services in Gloucestershire 2012, and any updates), where development occurs it will be assessed by the County Council to determine whether it will adversely impact on the existing provision of local library services. In this case the proposed development and increase in population will have an impact on resources at the local library and a contribution is required.

Background Library Information:

- Gloucestershire County Council has a statutory duty to provide a comprehensive and efficient library service to all who live, work or study in the County.

- This application has been assessed for impact on various GCC community infrastructures in accordance with the "Local Developer Guide" (LDG) adopted 2014 and revised 2016. The LDG is considered a material consideration in the determination of the impact of proposed development on infrastructure.
<https://www.gloucestershire.gov.uk/planning-and-environment/planning-policy/gloucestershire-localdeveloper-guide-infrastructure-and-services-with-new-development/> The LDG is currently being updated.

- New development will be assessed by the County Council to determine whether it will adversely impact on the existing provision of local library services. In doing so careful consideration will be given to current levels of provision compared against the nationally recommended benchmark of the Arts Council - formerly put together by Museums, Libraries and Archives Council (MLA).

- A Strategy for Library Services in Gloucester 2012. This strategy for providing library services is set in the context of two main drivers for change; the technological revolution and the financial situation.

<https://www.gloucestershire.gov.uk/libraries/library-strategy-and-policies/>
https://www.gloucestershire.gov.uk/media/3413/updated_strategy1__-64623.pdf

Compliance with CIL Regulation 122 and paragraph 56 of the NPPF:

The Community Infrastructure Levy (CIL) is a charge which can be levied by Charging Authorities on new development in their area.

Planning obligations assist in mitigating the impact of unacceptable development to make it acceptable in planning terms. Planning obligations may only constitute a reason for granting planning permission if they meet the tests that they are necessary to make the development acceptable in planning terms.

They must be:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

These tests are set out as statutory tests in regulation 122 (as amended by the 2011 and 2019 Regulations) and as policy tests in the National Planning Policy Framework. These tests apply whether or not there is a levy charging schedule for the area.

As a result of these regulations, Local Authorities and applicants need to ensure that planning obligations are genuinely 'necessary' and 'directly' related to the development'. As such, the regulations restrict Local Authorities ability to use Section 106 Agreements to fund generic infrastructure projects, unless the above tests are met. Where planning obligations do not meet the above tests, it is 'unlawful' for those obligations to be taken into account when determining an application.

Amendments to the Community Infrastructure Levy Regulations 2010 were introduced on 1 September 2019. The most noticeable change in the amendments is the 'lifting' of the 'pooling restriction' and the 'lifting' of the prohibition on section 106 obligations in respect of the provision of the funding or provisions of infrastructure listed on an authority's published

'regulation 123 list' as infrastructure that it intends will be, or may be, wholly or partly funded by CIL (as a result of the deletion of Regulation 123).

Any development granted planning permission on or after 1 September 2019 may now be subject to section 106 obligations contributing to infrastructure that has already benefited from contributions from five or more planning obligations since 6 April 2010 and authorities are allowed to use funds from both section 106 contributions and CIL for the same infrastructure. However, the tests in Regulation 122 continue to apply.

The Department for Education has updated its guidance in the form of a document entitled "Securing developer contributions for education (November 2019), paragraph 4 (page 6) states that:

"In two-tier areas where education and planning responsibility are not held within the same local authority, planning obligations may be the most effective mechanism for securing developer contributions for education, subject to the tests outlined in paragraph 1 [the 3 statutory tests set out in 1.3 above]. The use of planning obligations where there is a demonstrable link between the development and its education requirements can provide certainty over the amount and timing of the funding you need to deliver sufficient school places. We recommend that planning obligations allow enough time for developer contributions to be spent (often this is 10 years, or no time limit is specified)"

Phasing of payments will be by agreement. These will be expected to be paid in advance of the impact arising, to allow sufficient time for expenditure. Payments will relate to identifiable triggers. The number of triggers/phases will depend on the scale of the development.

Education Contributions

The education contributions which are based on up to date pupil yield data are necessary to fund the provision of the additional pre-school, primary and secondary school places generated by this development because there is a lack of capacity in the relevant education sectors to address the increase in the numbers of children needing a place at a local school arising directly from this development.

There will be an additional 75 pupils in the pre-school sector, 103 pupils in the primary sector and 78 pupils in the 11-18 secondary sector all needing a place at a local school.

The maximum contribution amount stated in the Education Report is calculated by multiplying the DfE Multiplier* x Pupil Yield

- Multipliers 2019 (DfE per pupil):
£15,091.00 - Pre-school/Primary
£19,490.00 - Secondary 11-16yrs
£23,012.00 - Secondary 16-18yrs

In updated DfE Guidance on securing developer contributions for education provision, GCC has a duty to ensure early years childcare provision within the terms set out in the Childcare Acts 2006 and 2016. The DfE has scaled up state-funded early years places since 2010, including the introduction of funding for eligible 2 year olds and the 30 hours funded childcare offer for 3-4 year olds. The take-up has been high, which has increased the demand for early years provision and as such developer contributions have a role to play in helping to fund additional nursery places required as a result of housing growth .

Pre-school provision is a very complex area. It is far more open to market forces and parental choice than the Primary and Secondary education sectors and some providers consider certain information proprietary. Early Years providers have no statutory duty to

inform GCC of vacancies and data can change regularly dependant on parents work arrangements and their take up of the funded places.

The forecast data for early years/pre-school shows that there are 1215 children aged 0-4 years old in the Primary Planning Area and a total of 757 childcare places. As such the current population is significantly higher than the number of places available.

The nearest primary school is St Mary's CofE Infant and Prestbury St Mary's Junior Schools in the Whaddon Primary Planning Area. The forecast data shows that the schools have no spare capacity showing in the penultimate forecast year, and when the cumulative yield from other developments is applied it shows a shortfall of 59 places, before the addition of this development. The numbers on roll in Jan 2020 are higher for both infants and junior schools than the stated building capacity for all but 1 forecast year.

The forecast data for Secondary shows that the Pittville School which is the nearest Secondary is forecast to be over capacity before the yields from this development will have an impact. The school has made changes to address increasing demand and there is no spare capacity to accommodate children arising from this development. The building capacity is exceeded for all for the next 5 forecast years

The education contributions requested are directly related to the proposed development in that they have been assessed against the local forecast data and current school capacity and the contributions have been calculated based on specific approved DfE multipliers and formulas relative to the numbers of children generated by this development.

Any existing capacity has been accounted for and the contributions requested are specific to the additional places required arising from this development. The contributions will be required to be paid on specific triggers relative to the progress and impact of the development. This will enable the Education Authority and local schools to plan appropriately and in a timely way to provide for the additional capacity to accommodate additional children arising from this development.

The contributions are necessary to make the development acceptable in planning terms because they will be paid to the County Council in a timely way as the development progresses and allocated and spent towards improving capacity and suitability at the local schools in the school planning area to enable children from this development to attend a local school. Without these contributions, the local schools would not be able to provide for and accommodate the additional growth resulting from this development.

The contributions are fair and reasonable to mitigate the impacts of the proposed development because they only relate to the additional pupils arising directly from this development to cover the costs of the extra places that will be required. The amount of contribution is based only on the numbers of additional pupils arising from the proposed qualified dwellings. The calculations result from recent evidence based studies undertaken by the Education Authority and by updated DfE Pupil multipliers.

Library Contributions

The contribution towards the nearest library which is Oakley Library is necessary to make this development acceptable in planning terms.

The contribution would be used to offer public access to library services from this location to complement the existing education-related support services that are currently available. Contributions would be towards stock, IT and digital technology, and increased services to mitigate the impact of increasing numbers of users directly arising from this development.

The contribution is reasonable and fair in scale being calculated by reference to the Public Libraries, Archives and New Development A Standard Charge Approach (May 2010).

CIL/S106 Funding Position

There are currently no mechanisms or mutually agreed financial arrangements in place between the LPA as CIL Charging Authority and GCC to fund GCC strategic infrastructure from the CIL regime to mitigate the impact of this development as it occurs.

The level of CIL charged on a development is unlikely to cover the amount of developer contributions that would be required to contribute towards the strategic infrastructure necessary to mitigate the impact of this development.

Tree Officer

6th August 2020

The CBC Tree Section acknowledges that this proposal does not involve the removal of TPO'd trees situated within the site and appears to have made trees a significant site constraint when initially designing the site.

However, whilst the green nature of much of the site is proposed for retention, the proposal as a whole, will involve substantial tree removals. The true extent of such removals is not easily apparent. Please could a tree and hedge retention and removal schedule and map be submitted as a part of this planning application. The true extent of the implications on trees of the application should then become more apparent and easier to assess. This retention and removal schedule should then be used as a part of an Arb Implications Assessment, which should then be able to demonstrate the 'overall net gain of trees and shrubs' referred to in the landscape strategy drawing. This net gain should be in terms of canopy cover, not tree/hedge numbers removed versus trees/shrubs planted.

Whilst the area proposed for open space and natural play provision is also welcome, it is noted that in many of the trees in the more densely wooded areas do not appear to be appropriate for such natural play. Many of the trees within this area are over-mature and are in a poor structural condition. Indeed many of the trees are ash and as such their long term future life expectancy is limited (due to Chalara). Several ash trees on site are already showing significant symptoms of Chalara die-back.

In several incidences, it is noted that TPO protected trees are to be retained and built around. Whilst such development maybe outside the Root Protection Area of these trees, the trees appear to be a 'visual focus' for adjacent dwellings. However, the trees concerned are delicate and fully/over-mature. The areas beneath the canopy and adjacent should not become play/leisure areas. Should this happen, it can lead to unwelcome requests to heavily prune in an attempt to make the area a 'more safe' place to play. Such pruning can be inappropriate from an arboricultural perspective. Indeed encouraging play so close to such mature and delicate trees can have a negative impact in terms of soil compaction, soil damage (fires/spillages/bark damage/vandalism etc). Deterrent planting under the canopy should be considered so as to strongly discourage such play (as well as to improve bio-diversity).

It is noted that the soil has a high proportion of clay. Oak roots are extremely adaptable (more than most tree species) at seeking out new sources of water a long way from the trunk. Unless building foundations are designed to take account of this soil, it is likely that there will be future claims for tree removal as a result of subsidence to such buildings.

Whilst the MHP tree survey appears detailed and comprehensive, no programme of works has been recommended should the application be granted. It would be helpful to the Arb Implications Assessment if all such necessary and desirable pruning is to be detailed.

Given the apparent clay based nature of the soil, and the extensive proposed tree/hedge planting, if such a planting scheme is to succeed, carefully chosen palette of

tree/shrub/hedge species must be considered. Many such species do not easily thrive on clay soil and such species should not be considered. Similarly, an indication of the size of proposed trees and hedges should be made. Small trees establish and grow much more quickly than large ones, but there is an obvious diminished visual landscape impact of such small tree planting.

All tree/hedge planting must have appropriate and rigorously maintained protection especially from deer which can instantly decimate a growing tree population.

Appropriate heads of terms to address a short, medium and long term management plan should be submitted and agreed as a part of this application.

The proposal for oak trees to predominate the planted open space areas is welcome.

Several trees are marked within the tree survey as being beyond the site boundary. Whilst they are beyond the fence-line, is it definite that such trees are outside of the site? If this is the case, the owner (Gloucestershire Highways?) must be identified and made aware of their current and future responsibilities re future management of such trees. It would be preferable if such tree ownership were brought within the site.

14th August 2020 - To clarify (and extend) my requested tree removal and retention plan, it would also be helpful if the Veteran Tree Buffer (VTB) for veteran trees identified within the MHP tree survey were marked on this drawing.

It would also be helpful if the trees position could be marked (with the VTB also shown) on the proposed illustrative master plan- i.e. so we can see the position of all trees within the context of their proposal-but also and especially with regard to the VTB of veteran trees.

30th September 2020

The submission of a Tree Removal and Retention plan as well as an Arboricultural Implications Assessment is appreciated and makes the overall assessment of the suggested impact on trees within and adjacent to the site easier to assess.

It is considered that G12 (currently due for retention) is likely to have to be removed due to the nature of the species and the condition of the trees within. As such, the predicted overall retained canopy area of the site will be reduced from the figure shown.

There is a significant population of ash trees within this site. Whilst not as a direct result of this proposed development, there is no reason to suppose (drawing from lessons elsewhere in the country) that this ash tree population will not have to be removed as a part of ash die back management over the next decade or so. Consequently, the nature of the proposed site will change significantly. It is also considered that the upper southern slopes (towards Harp Hill) are quite steep for traditional recreational play/leisure. As such the large proposed grassland and open areas towards the south should be more densely planted with new tree planting. This will help screen this proposal from higher elevations but also help retain a rich arboricultural fabric throughout the site as well as reduce the rate of rain water run-off, reduce wind speeds, improve ecology and all the usual tangible natural benefits of tree planting but also provide for a more pleasant natural environment. Landscape architects should not necessarily be bound to providing native tree planting within this natural recreation space.

Whilst it is conceded that possible future inappropriate pruning of high value TPO'd trees can be controlled through the usual TPO process, it is also reasonable to suggest that this council may be under frequent and significant requests to prune/fell. This can be reduced through appropriate barrier planting as well as fencing etc at development stage. It is suggested that a firm commitment is made which will give rigorous physical protection to such trees in residential areas. This commitment must be detailed in short, medium and

long term management plans. The heads of terms of such management plans are requested as a part of this application.

Whilst it is shown that Highway trees on the site perimeter on Harp Hill are to be retained, it would be preferable from a homogenous management perspective if such trees could be brought under management of the site as a whole.

It is conceded that detailed pruning, foundation design detail and tree planting species detail can be left to any future "Reserved Matters" application.

Gloucestershire Centre for Environmental Records

27th July 2020

Report available to view on line.

The Woodland Trust

13th August

Objection - potential for damage or loss of veteran trees

The Woodland Trust is the UK's leading woodland conservation charity. The Trust aims to protect native woods, trees and their wildlife for the future. We own over 1,000 sites across the UK, covering around 24,000 hectares (59,000 acres) and we have 500,000 members and supporters.

We are contacting you in relation to this application on account of the potential for the application in question to result in adverse impacts on a number of veteran and notable trees. While we are encouraged by the Arboricultural Survey and Statement submitted as part of this application and the identification of veteran trees as part of this assessment, it is not clear whether the applicant will be following the advice and guidance of the consultant who wrote the assessment.

As part of the aforementioned survey, the applicant's consultant has rightly sought to identify whether any of the trees on site are registered to our Ancient Tree Inventory (ATI), and having found no records they have themselves identified the following eight trees as veteran specimens: T18, T28, T35, T37, T52, T63, T68, and T72. A further three trees, T14, T38 and T45, appear to be notable trees that are likely to become veterans in the future given space to grow and develop ancient characteristics. It should be noted that the ATI is not a comprehensive database and is reliant on the public adding records of trees, so it is not unusual for veteran trees to not be recorded on the ATI database.

While a survey and report has been produced, it appears that the applicant has not provided any clearly labelled plans or maps to mark out the location of the surveyed trees in respect to the proposed dwellings and other infrastructure proposed as part of this application. In other words there are no plans to indicate that the development will ensure the retention of these veteran trees or provide veteran tree buffers as required by Natural England's standing advice (<https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>).

In the absence of such plans, we have to presume that the identified veteran trees could be under threat of loss from proposed development or damage from encroachment within their buffers. Until such plans have been produced to make it clear that the identified veteran trees will be retained and afforded appropriate veteran tree buffers, then the application in question should be rejected.

This is in line with National Planning Policy Framework (NPPF), paragraph 175, which states: "When determining planning applications, local planning authorities should apply the following principles: c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists;"

The development in question does not fall within the definitions of being exceptional development (defined in Footnote 58 of the NPPF). As such, the potential for this development to impact on veteran trees means it should be refused on the grounds it does not comply with national planning policy.

Ancient, veteran and notable trees are a vital and treasured part of the UK's natural and cultural landscape, representing a resource of great international significance. The number of veteran and notable trees on this relatively small site makes the site and the assemblage of trees particularly valuable for wildlife.

In summary, the Trust will maintain a holding objection to this application until it has been made clear that the development will not impact on these irreplaceable veteran trees.

We hope you find our comments to be of use to you. Please do not hesitate to get in contact with the Trust if you have any questions or concerns regarding the comments we have provided.

Landscape Officer

6th August 2020

These are our main thoughts regarding the current application.

LOCATION: Oakley Farm Priors Road Cheltenham

- o The survey assessing the existing vegetation is not detailed.
- o The proposal does not maximise retention of significant (important, best, good high quality) vegetation which helps retain the original landscape pattern.
- o Does the built form layout relate to the landscape retained & new?
- o Does the perimeter vegetation retained & new relate to the development and the land uses adjacent outside the site?
- o Does it provide sufficient screening / privacy where required and good visual connection where appropriate?
- o What type of planting for what purpose?
- o Does the strategy look like it will succeed in what it is trying to achieve? I.e. screen where it needs screens, provide woodland where it is supposed to be a woodland, hedge where it is a hedge etc. -and in this case in particular, retain a tree where it shows a retained tree (root protection areas)?
- o Do the larger areas of open space provide good amenity and good habitat, good access, protected from vehicles, are they maintainable?
- o What does the street space landscape look like, is this appropriate?
- o Land form and landscape features - are these retained and integrated into the layout?
- o Does the build form relate to the gradients / contours?
- o Is there good access for pedestrians / cyclists within the site and to outside destinations, both for practical purposes and recreation purposes; if I want to walk my dog is there a network of circular routes?
- o How is water managed, from roofs, roads & grass? Are balancing ponds useful features when dry integrated with the development providing amenity and habitat?
- o What are the provisions for more formal recreation play areas?

Parish Council
20th August 2020

Objection:

The site is in the Cotswolds AONB. While it is almost surrounded by development, this was the case when the site was included in the AONB and confirmed in the 1990's, so nothing has changed from when it was deemed important enough for AONB status, save that the GCHQ site has been replaced by retail and housing.

The area was described as having High Landscape value in the 'Ryder' report, and again, nothing has changed to alter that.

The proposal describes the development as being on the lower slopes, when in practice it covers two thirds of the site.

Clause 12 of the NPPF states: 'The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted.' The area is not listed as suitable for development in either the Cheltenham Plan or the Joint Core Strategy.

Clause 172 of the NPPF states: 'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues'. This proposal can in no way be seen to conserve or enhance the AONB.

The proposal would result in huge loss of amenity for surrounding residents, particularly those on Harp Hill, Pillowell Close, Brockweir Road, Bream Court, Highnam Place, Birdlip Road and the top of Wessex Drive, changing the aspect of their homes from being on the edge of the countryside to being surrounded in sub-urban sprawl.

With regard to traffic, the proposed development will not be served by public transport, so it is reasonable to assume an average of two cars per household, the bulk of which would leave the site between 07:00 & 09:00 for commuting to work and / or taking children to school.

Using Harp Hill as the access point means that traffic will enter the wider road network either via Mill Lane, leading to Ryeworth Road or Glenfall Way, Greenway Lane, or the bottom of Harp Hill at Priors Road. Mill Lane is clearly not suitable for a large volume of traffic. Greenway Lane is already heavily congested at the Sixways junction during rush hour. This means the bulk of 250 vehicle movements per hour will use the Harp Hill junction with Priors Road. That is an additional vehicle every 15 seconds. This increase in traffic volumes would result in large scale congestion with the resultant noise and pollution increases for the residents on the affected roads.

Gloucestershire Wildlife Trust
17th August 2020

I can confirm that I have reviewed this application on behalf of Gloucestershire Wildlife Trust and the trust will not be taking a stance either in favour or objection. Based on the plans submitted it is unlikely the development will have a significant impact on designated biodiversity sites, priority habitats, threatened species or ecological networks. However, due to the size of the development the Trust recommends that opportunities for ecological

enhancement through the provision of high quality Green Infrastructure should be included. This should align with the Nature Recovery Network.

It should be noted that Gloucestershire Wildlife Trust can only comment on impacts to wildlife, which is our area of expertise and the charitable objective of the Trust. The Trust cannot take a view about impact on landscape character, aesthetics, flooding, recreational greenspace or green belt unless there is also a significant impact on wildlife.

Minerals and Waste Policy Gloucestershire

17th July 2020

Minerals and Waste Policy officer comments

All of the details set out within this section are made by officers on behalf of Gloucestershire County Council in its capacity as the Mineral and Waste Planning Authority (MWPA): -

A waste minimisation statement accompanies the planning application. However the statement does not give specific details on the waste tonnages that will be generated, which is a requirement of the adopted Waste minimisation in development projects (SPD). This is also supported by two local development plan policies - Gloucestershire Waste Core Strategy Core Policy 2 | Waste Reduction and Minerals Local Plan for Gloucestershire Policy SR01 | Maximising the use of secondary and recycled aggregates.

Recommended action

If the case officer is minded to approve the application then the condition below should be attached.

Conditions recommended by officers on behalf of the MWPA (if advised) Application including a Waste Min. Statement but without volumes of waste likely to be generated:

Condition:

No development shall commence until a detailed Site Waste Management Plan has been submitted to and approved in writing by the local planning authority. The Plan shall identify the main waste materials expected to be generated by the development during the construction phase and set out measures for dealing with such materials so as to minimise overall waste and to maximise re-use, recycling and recovery in line with the waste hierarchy. The detailed Site Waste Management Plan must include: -

- i) Information on the type and amount of waste likely to be generated prior to and during the construction phase;
- ii) Details of the practical arrangements for managing waste generated during construction in accordance with the principles of waste minimisation; and
- iii) Details of the measures for ensuring the delivery of waste minimisation during the construction phase.

The Site Waste Management Plan shall be fully implemented as approved unless the local planning authority gives prior written permission for any variation.

Reason: To ensure the effective implementation of waste minimisation in accordance with Gloucestershire Waste Core Strategy: Core Policy WCS2 - Waste Reduction.

Architects Panel

11th August 2020

Design Concept As this application is for approval of access only with all other matters reserved for future consideration, the panel agreed there was insufficient information presented with the application to be able to provide meaningful comment.

As the site is within the AONB the design merits being reviewed as a whole.

There is no justification to establish the site as a residential site.

Design Detail

Whilst a notional site development layout has been submitted with the application, and some preliminary landscape design proposals, more detailed analysis is required, in particular site sections, to show the existing site context and the impact of the development. The very steep new roads, their position and layout, together with the housing layout, could potentially have a harmful impact on the setting.

Recommendation: Withdraw the application and submit a Full Planning application when the scheme has been fully designed.

Social Housing

19th August 2020

Level of Affordable Housing Provision:

Based on a scheme of 250 residential units we will be seeking 40% affordable housing in line with JCS Policy SD12: Affordable Housing (100 affordable homes).

The Council will also explore with the developer, Homes England and local Registered Providers regarding the possibility of securing additional affordable housing units on the site.

The Council interprets that latest LHNA that has been commissioned also requires a mix of 70:30 rented to intermediate housing. This mix strikes a balance between fostering cohesive, resilient communities and meeting affordable housing needs.

Dwelling Mix

Having regard to local needs and a mix of 70:30 rented to intermediate housing, we would seek the following mix of affordable dwellings on a policy compliant site:

The Council	40% affordable (100 affordable homes)	Social Rented	Shared Ownership (let in line with CFG)	Totals:	As % of total affordable.
Ouncill	1b2p Ground Floor Maisonette, M4(2) Cat 2, 50m2.	8	0	8	24
Willing	1b2p Upper Floor Maisonette, 50m2.	8	0	8	
Als	1b2p Bungalow M4(3) Cat 3b, 60m2	2	0	2	
Ox	1b2p Bungalow M4(2) Cat 2, 50m2	6	0	6	42
Plo	2b4p House, 67m2	6	10	16	
re	2b4p House, 79m2 (M4(2) Cat 2)	8	8	16	
it	2b4p Ground Floor Maisonette 71m2 M4(2) Cat 2	5	0	5	
hd	2b4p Upper Floor Maisonette 71m2	5	0	5	
eve	3b5p House, 82m2	7	8	15	27
lope	3b5p House M4(2) Cat 2	4	0	4	
r,	3b6p House, 95m2,	4	4	8	
Hom	4b7p House, 108m2.	6	0	6	6
es	5b8p House, 121m2	1	0	1	1
Totals:		70%	30%	100	

Viability:

The Joint Core Strategy states that where there is an issue relating to the viability of development that impacts on delivery of the full affordable housing requirement, developers should consider:

- Varying the housing mix and design of the scheme in order to reduce costs whilst having regard to the requirements of other policies in the plan, particularly Policy SD4, and the objective of creating a balanced housing market.
- Securing public subsidy or other commuted sums to assist delivery of affordable housing

If a development cannot deliver the full affordable housing requirement, a viability assessment conforming to an agreed methodology, in accordance with Policy INF6 will be required. Viability assessments will be published in full prior to determination for all non-policy compliant schemes except in exceptional circumstances when it can be proven that publication of certain specific information would harm the commercial confidentiality of the developer to no public benefit. Where necessary CBC will then arrange for them to be independently appraised at the expense of the applicant.

The council considers that information submitted as a part of, and in support of a viability assessment should be treated transparently and be available for wider scrutiny. In submitting information, applicants should do so in the knowledge that this will be made publicly available alongside other application documents.

The council will allow for exceptions to this in very limited circumstances and only in the event that there is a convincing case that disclosure of an element of a viability assessment would cause harm to the public interest to an extent that is not outweighed by the benefits of disclosure. Given the significant benefits associated with the availability of information to the public as part of the decision making process, and the other factors identified above, the councils anticipate that there would be very few exceptions.

If an applicant wishes to make a case for an exceptional circumstance in relation to an element of their assessment, they should provide a full justification as to the extent to which disclosure of a specific piece of information would cause an 'adverse effect' and harm to the public interest that is not outweighed by the benefits of disclosure. The council will consider this carefully, with reference to the 'adverse effect' and overriding 'public interest' tests in the EIR, as well as the specific circumstances of the case.

The viability of a site may enable additional levels of affordable housing to be delivered above the requirements set out in the Joint core Strategy. In this case the authority will negotiate with developers to find an appropriate balance to deliver affordable housing and infrastructure needs.

Dwelling Mix:

JCS Policy SD11 sets out that development should address the needs of the local area, including older people, as set out in the local housing evidence base including the most up to date SHMA.

The Council's preferred dwelling mix is found above and has been informed by a number of evidence bases that are reflective of affordable housing need of the Borough.

First and foremost, this mix has been informed by the Council's Housing Register, which, as of July 2020 indicated that 2,205 households were in affordable housing need in

Cheltenham Borough; of these, 1,162 households were in 1 bedroom need, 630 households were in 2 bedroom need, 302 households were in 3 bedroom need, and 112 households were in 4+ bedroom need.

When deciding upon an appropriate affordable housing mix, it is also useful to consider the 'churn' and waiting times of affordable homes in the Borough, which indicates the availability of certain property sizes for households in affordable housing need.

Considering the churn of affordable homes in the Borough, the latest Locata reports indicate that, of 1,874 lets completed between 01/01/2016 and 30/07/2020 in Cheltenham Borough, only 50 lets were for 4 bedroom affordable homes (3% of total lets) and 4 (0.2% of total lets) were for 5 bedroom homes. For the sake of comparison, in the aforementioned timeframe the Council let 343 three bedroom affordable homes (18% of total lets) and 730 two bedroom affordable homes (39% of total lets), with the remaining 747 lets completed (40% of total lets) being for 1 bedroom affordable homes. Whilst it is recognised that not all of these lets will relate directly to new-build affordable homes, it is nevertheless important to consider churn as an indication of the availability of affordable homes for households in need in the Borough.

Moving onto examine the waiting times for the allocation of affordable homes in Cheltenham Borough between 01/01/2016 and 30/07/2020, a clear trend emerges surrounding extended waiting times for households in 4 and 5 bedroom affordable housing need compared to those requiring smaller affordable homes. Case and point, the average wait for a 1, 2 or 3 bedroom home ranged between 7-14 months in this period, compared to an average wait of 18 months for a 4 bedroom affordable home or 32 months for a 5 bedroom affordable home in the Borough.

The Council has also drawn upon past delivery of affordable homes in Cheltenham Borough when deciding upon a mix that best accommodates local affordable housing needs. Between 2011/12- 2019/20, the Council has delivered 32 four bedroom + homes (approximately 5% of overall delivery). However, despite this delivery, clearly a significant need for larger affordable homes still exists.

Figure 59 of the 2020 Gloucestershire LHNA also provides a basis for establishing an appropriate dwelling mix, when considered in a holistic manner with other databases indicating affordable housing need. The LHNA reflects that Cheltenham Borough has a need to deliver 1,510 rented homes between 2021-41; of these, the LHNA identifies a need for approximately 534 (35%) 1 bedroom affordable homes, 481 (32%) 2 bedroom affordable homes, 265 (18%) 3 bedroom affordable homes and 230 (15%) 4+ bedroom affordable homes.

The Council's mix also indicates clear preference for providing a contingent of 1 bedroom bungalows, on the grounds of providing an attractive offer for downsizers (with 57 downsizers currently on the Housing Register for 1 bedroom accommodation). Cheltenham Borough's emerging evidence base, the 2020 Gloucestershire LHNA, supports this approach, noting that for every bungalow built, a large affordable home is released into the wider affordable housing stock.

Taken altogether, these evidence bases have been balanced against housing management implications for RP's to inform the Council's preferred affordable housing mix found on Page 1.

Rents

The 2015 SHMA Update Note indicates a substantial need for rented affordable housing in Cheltenham Borough with particular emphasis upon the need for social rented homes. Case and point, of 707 households in need of affordable housing each year in Cheltenham,

Table A1.12 states that 76% of Cheltenham Borough Council's total affordable housing delivery (537 Affordable Homes per annum) should be in the form of Social Rent, compared to 15% for Affordable Rent respectively.

In addition to the above, the Council's emerging evidence base, the 2020 Gloucestershire LHNA (which has been signed off, but is not yet publically available) indicates that Cheltenham Borough has an overriding need to deliver social rented homes to meet affordable housing need. Figure 86 reflects that, between 2021-41, Cheltenham Borough has a need for 1,511 rented homes, of which 1,325 new affordable homes should be provided in the form of Social Rent, which forms 88% of Cheltenham's rented need. Accordingly, the Housing Enabling team will seek the entire rented provision on this scheme in the form of Social Rent to best accommodate identified affordable housing needs.

In particular, the emerging LHNA makes a compelling case for delivering 1 bedroom and 4 bedroom + units at Social Rented levels. Addressing the case for delivering 1 bedroom affordable homes at social rent, The LHNA identifies that an annual income of £15,762 is required to rent a 1 bedroom Affordable Rented property in Cheltenham Borough, however, the maximum annual income for housing benefit support in the Borough for a 1 bedroom household ranges between £12,791 and £14,970. This leaves a shortfall of £792-£2,971 between the maximum housing benefit support a household can receive and the annual income required to ensure that households were not spending more than 35% of the gross annual income on their housing costs. Accordingly, providing 1 bedroom affordable homes at social rented levels will ensure that they are genuinely affordable for households in affordable housing need.

Equally, due to the impact of the benefit cap upon larger households, the Council is also justified in seeking 4 and 5 bedroom affordable homes to be provided at Social Rented levels.

Consulting with RP's has testified to the fact that providing the entirety of the rented provision at social rented levels will also provide wider benefits beyond meeting affordable housing need. For instance, whilst in theory, housing costs should be covered in full by housing benefit at affordable rented levels, where households are working part-time, housing benefit is correspondingly reduced, meaning that housing costs take up a greater percentage of household earnings, which, in turn, is likely to lead to households falling into housing stress and threatening the sustainability of their tenancy.

Equally important, by providing the affordable homes on this development at social rented levels will reduce the burden upon housing benefit (by granting households greater disposable income due to the lower rental levels associated with social rent).

The Council are keen to take steps to ensure that tenancies are sustainable, as this will help contribute towards creating cohesive, resilient communities which, in turn will aid all residents in reaching their potential. Therefore, by providing affordable homes at Social Rented levels, households are likely to have increased levels of disposable income and a better quality of life.

Service Charges

Any service charges on the affordable dwellings should be eligible for Housing Benefit.

Service charges should be kept minimal this can be achieved through the design and we would be happy to refer you to RP's for further input if necessary.

Shared Ownership

Page 121

We would expect that the shared ownership units will be let at a level that is affordable, having regard to local incomes and house prices. Additionally, Shared Ownership homes should be let in line with the latest Capital Funding Guide (CFG) from Homes England.

Examining the latest figures provided by Help to Buy South Agent 3 to address Cheltenham's need for Shared Ownership homes reveals that 513 households specifically required Shared Ownership homes, (not including 195 households who applied for any scheme). Of these 513 households, the majority required a 2 bedroom Shared Ownership home, with 303 households (59% of total households) stating this preference.

Addressing the need for 1, 3 and 4 bedroom Shared Ownership properties in Cheltenham Borough, Help to Buy South Agent 3's statistics indicate that 94 households (18% of total households) required a 1 bedroom Shared Ownership home, 110 households (21% of total households) required a 3 bedroom Shared Ownership home, and 6 households (1% of total households) required a 4 bedroom Shared Ownership home.

Considering the preferences of those in Shared Ownership need, 75% of those in 2 bedroom need stated a preference for a house, with only 8% stating a need for a flat. Equally, no households in 3 bedroom need stated a preference for a 3 bedroom Shared Ownership flat, and, as such, the Council would also expect these properties to be houses.

Car Parking

Parking provision for affordable homes will be expected to be made on the same basis as that provided for market dwellings.

The Council would prefer on-plot parking wherever possible.

Affordable Housing Standards

We would expect all the affordable housing to meet minimum gross internal floor area size measurements, space, design and quality standards as described by the Homes England. JCS Policy SD11 states that housing should be designed to be accessible and adaptable as far as is compatible with the local context and other policies.

Amendments to M4(1), M4(2) and M4(3) of Schedule 1 to the Building Regulations 2010 took effect on 1st October 2015 therefore we would seek the Council's preferred mix found on Page 1.

All ground-floor flats or a proportion of dwellings (to be agreed) should be designed to meet the 2015 amendments of M4 (2) Building Regulations 2010.

Cheltenham's emerging evidence base, the 2020 Gloucestershire LHNA identifies that, between 2021-41, there is a need for 67% of all new development across Gloucestershire to meet M4(2) Cat 2 standards.

Looking at Cheltenham's needs specifically, the LHNA notes that Cheltenham Borough has a need to deliver 7,215 M4(2) Category 2 homes between 2021-41 (361 M4(2) Cat 2 dwellings per annum). It therefore follows that the Council will seek to maximise the provision of new M4(2) Category 2 affordable homes on this development scheme.

Scrutinising the need for M4(2) Cat 2 dwellings on a Borough-wide level, as informed by Homeseeker Plus data, the latest data indicates that 183 households in Cheltenham Borough require a 1 bedroom affordable ground floor flat or lift (level access accommodation), 51 households require a 2 bedroom affordable ground floor flat/lift, and 20 households require a 3 bedroom level access home. Clearly, these figures indicate a significant level of need for level access accommodation across 1, 2 (and to a lesser

degree) 3 bedroom affordable homes, which has been reflected in the ideal affordable housing mix found on Page 1.

Assessing the need for accessible, level access M4(2) Category 2 accommodation on a parish level (Charlton Kings), 45 households required a 1 bedroom affordable ground floor flat/lift (level access accommodation), 11 households require a 2 bedroom level access home, and 5 households require a 3 bedroom level access home. Therefore, considered in both the context of meeting Borough wide and local parish needs, there is a significant unmet need for M4(2) Category 2 properties on this development.

The Council would also be keen to explore the potential for straight staircases to be installed on the top floor of all maisonettes to facilitate easy adaptation for dwellings to meet M4(2) Category 2 standards (as updated from time-to-time) with Disabled Facilities Grant if and when required. This will enable households to maintain their tenancies and live sustainably for longer, as well as allowing households to access the entirety of their homes without restriction.

This approach is justified on the grounds of facilitating households to access the entirety of their property, free from any restraints in entering and exiting their home. In a day-to-day context, providing a significant number of M4(2) Category 2 accessible homes to meet identified needs will allow households to have socialise with friends, study in a comfortable environment and move freely about their home.

Any wheelchair user dwellings would be required to be designed to meet the 2015 amendments of M4 (3) Building Regulations. As the gross internal areas in this standard will not be adequate for wheelchair housing, additional internal area would be required to accommodate increased circulation and functionality to meet the needs of wheelchair households. The size standards expected from these dwellings has been set up in the affordable housing dwelling mix found on page 1.

Under the Public Sector Equality Duty found within the 2010 Equality Act, the Council has an obligation to, when exercising its functions (such as negotiating on affordable housing provision);

- Eliminate discrimination, harassment, victimisation and any other conduct prohibited under this Act;
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

The 2010 Equality Act goes on to state that Local Authorities (when exercising public functions, such as negotiating on affordable housing provision) should...

- Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
- Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- Encourage persons who share a relevant protected characteristic to participate in public life or any other activity in which participation by such persons is disproportionately low.

Our latest evidence base, the 2020 Gloucestershire LHNA, forecasts a need for Cheltenham Borough to deliver 213 M4(3) Category 3 affordable homes between 2021-2041 (an average of 11 per annum).

Reflecting upon the current for affordable M4(3) Cat 3 wheelchair accessible homes, the Council finds that as of July 2020, 57 households across the Borough are in need of wheelchair accessible accommodation. The majority of this need falls into 1 bedroom (32 households), with a lesser degree of need found in 2 and 3 bedrooms respectively.

The Council's ideal mix of wheelchair accessible dwellings is also informed by constrained past delivery of wheelchair accessible affordable homes in Cheltenham Borough. In this case, the Borough's affordable housing quarterly returns reflect that, in the period between 2011-12 and 2019-20, Cheltenham Borough Council has delivered 8 wheelchair accessible affordable homes. In essence, this means that there is likely to be a shortfall in the current provision/availability of wheelchair accessible homes in Cheltenham Borough that must be addressed, in part through new delivery where a need for these homes arises.

To this end, the Council will seek 2 x 1 bedroom wheelchair accessible M4(3) Category 3b wheelchair homes to meet the Borough-wide need for these dwellings. By delivering these affordable homes for wheelchair users, the Council will also be meeting its obligations under the 2010 Equality Act.

There is no longer a requirement for a specific level of Code for Sustainable Homes Standard to be achieved to meet HCA standards for new affordable homes. This is therefore to be negotiated with the developer.

Design, Clustering and Layout:

The design of affordable housing should meet required standards and be equal to that of market housing in terms of appearance, build quality and materials.

Furthermore, affordable housing should also be provided on-site and should be seamlessly integrated and seamlessly distributed throughout the development scheme to the extent that the development is tenure blind, and the affordable homes are visually indistinguishable from their affordable counterparts.

In line with the JCS clustering strategy, the Council will expect that each cluster of Affordable Housing Units shall not exceed eight (8) units unless otherwise agreed in writing by the Council.

The JCS clustering strategy also clarifies the Council's expectation that no group of Affordable Housing Units will be located contiguously to any other group of Affordable Housing Units.

Further guidance on appropriate clustering and/or layout of the affordable homes on this development scheme can be provided by the Housing Strategy and Enabling Officer upon request.

The Council will await a more detailed planning layout before commenting further upon the distribution and layout of the affordable homes.

Full Planning Application

On submission of a full planning/revised matters application we would require an Affordable Housing Plan as part of the application, detailing the location of both the market and affordable homes in terms of their type, tenure, accessibility standards and size as well as highlighting parking spaces and the dwellings they serve.

Registered Providers

All affordable housing should be provided by a Registered Provider who will be expected to enter into a nominations agreement with the Local Authority, providing 100% nominations on first letting/sale and 75% of all subsequent lettings thereafter. This will assist the Local Authority in meeting its statutory housing duties under the Housing and Homelessness legislation.

A list of Registered Providers managing accommodation in Cheltenham can be made available if needed.

5. PUBLICITY AND REPRESENTATIONS

Number of letters sent	313
Total comments received	377
Number of objections	371
Number of supporting	1
General comment	2

- 5.1** Letters of notification were sent to 313 properties. In addition, a number of site notices were displayed at various points around the periphery of the site and at the footpath entrance to the site on Priors Road. An advert was also placed in the Gloucestershire Echo. All publicity requirements of the EIA Regulations were also adhered to.
- 5.2** In response to the publicity and during the course of the application, a total of 377 representations have been received (at the time of writing); 371 of which raise objection to the proposals.
- 5.3** The third party objections also include a substantive representation from the local amenity/action group 'Friends of Oakley Farm Pasture Slopes'.
- 5.4** The Parish Council objects to the proposed development; their concerns, in summary, relate to proposed built form covering two thirds of the existing pasture slopes, landscape and visual impact on the AONB, amenities of neighbouring properties, traffic increase and junction capacity. The Council's full comments are set out in section 4.
- 5.5** All representations received during the course of the application have been made available to Members separately. In summary, the concerns raised relate to (but are not limited to) the following matters:
- Loss of AONB and greenfield site
 - Impact on landscape quality, visual amenities, character and appearance of AONB
 - Visual impact and urbanising effects of proposed development
 - The special circumstances that would allow major development in AONB have not been provided.
 - Proposals contrary to national and local planning policy and Cotswold AONB Area Management Plan for development within AONB and findings of the Council's 'Landscape Character, Sensitivity and Capacity Assessment of Cotswold AONB within Cheltenham Borough Administrative Area'.
 - Impact of proposals on mental and physical well-being
 - Site not allocated for housing in local plan/JCS and located outside PUA
 - Loss of farmland and development on a greenfield site inappropriate
 - Topography/steep slope of site unsuitable for residential development
 - Lack of infrastructure proposed and pressures on existing schools, community services and utilities
 - Increase in traffic, speed of traffic, unsuitability of Harp Hill/Greenway Lane, proposed access from Harp Hill and pressures on local road network. Congestion at Priors Road roundabout and other road junctions. Highway safety implications and safety of pedestrians and cyclists.
 - No footpath/pavement linking application site to public highway
 - No greenspace/parkland buffer proposed adjacent to Oakley Grange
 - Ecological harm, loss of (Veteran) trees, hedgerow, wildlife, habitat, flora and fauna.

- Overdevelopment, increase in density and cumulative impacts of other recent development
- Indicative scheme is of poor design and layout and fails to adhere to principles of good urban design
- Impact on designated Heritage Assets – grade II listed Hewlett’s Reservoir
- Impact on drainage and flooding in area,
- Environmental pollution – air quality, traffic pollution, light and noise emissions
- Loss of privacy and outlook from neighbouring properties
- Disturbance, heavy traffic and damage to nearby properties during construction programme
- Development should be planning-led

6. OFFICER COMMENTS

6.1 Determining Issues

6.2 The key issues relating to this proposal are:-

- the principle of the redevelopment of the site for housing;
- housing need including affordable housing provision
- the impact of the proposals on the beauty and landscape qualities of the Cotswold AONB including visual impact ;
- the size/scale/density of development proposed;
- impact on designated heritage assets;
- archaeology
- wildlife, habitats and biodiversity;
- removal of trees and hedgerow;
- drainage and flood risk;
- access, traffic and highway safety;
- infrastructure and services provision including education;
- environmental pollution and site contamination
- impact on amenities of adjoining land users.

6.3 Note, that the above considerations are not listed in any particular order of importance or relevance.

6.4 Policy Background/Principle of Development

6.5 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. This is reiterated in paragraph 47 of the National Planning Policy Framework (NPPF) which also highlights that decisions on applications should be made as quickly as possible.

6.6 The development plan comprises of the Cheltenham Plan (CP) (adopted 2020) and adopted policies of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011-2031 (JCS) (adopted 2017). Material considerations include the National Planning Policy Framework (NPPF), Planning Practice Guidance (PPG), the Cotswold AONB Management Plan 2018-23 (CMP) and the Countryside and Rights of Way Act (CROW).

6.7 The Council’s Strategic Land Use Officer has commented on the policy implications of the proposed development, as set in section 4 above. These comments should be read in conjunction with the following policy considerations, particularly those in relation to the interpretation of paragraph 11(d) of the NPPF.

6.8 Principle/Housing development within the AONB

- 6.9 Policy SD10 of the JCS advises that in Cheltenham on sites that are not allocated, housing development will be permitted on previously-developed land within the Principal Urban Area (PUA). Housing development on other sites will only be permitted where it is infilling within the PUA or affordable housing on a rural exception site or there are other specific exceptions/circumstances defined in district or neighbourhood plans.
- 6.10 The application site is located outside of the PUA and is not previously-developed land or a rural exception site. Nor are there any special circumstances relating to this site identified in the CP. The proposed development is therefore contrary to development plan policy. The principle of the redevelopment of this site for residential purposes must therefore be considered unacceptable.
- 6.11 Paragraph 11 of the NPPF sets out a '*presumption in favour of sustainable development*' which in decision making means '*approving development proposals that accord with an up-to-date development plan*'. Where policies which are most important for determining the application are out-of-date, the NPPF at paragraph 11(d) advises that planning permission should be granted '*(i) unless the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole*'. This is referred to as the 'tilted balance' and the government's approach to ensuring delivery of housing nationally.
- 6.12 The Footnote 6 protected areas or assets referred to at (i) above are, in this case, the Cotswold Area of Outstanding Natural Beauty, the Grade II listed structures at Hewlett's Reservoir and the Battledown Camp Scheduled Monument.
- 6.13 Footnote 7 of NPPF paragraph 11 explains further that for applications involving the provision of housing, relevant policies must be considered out of date in situations where the local planning authority cannot demonstrate a five year supply of deliverable housing.
- 6.14 Cheltenham Borough Council is currently unable to demonstrate a five-year supply of housing land and at the time of writing, the latest figure (December 2019) sits at 3.7 years. As such, the housing supply policies in the development plan are out-of-date and the 'tilted balance' in favour of granting planning permission is engaged. The shortfall position in housing land supply and the contribution of 250 houses in alleviating that shortfall is a material consideration.
- 6.15 The principal reason for the under delivery of housing is that the JCS Strategic Allocations at West and North West Cheltenham have not progressed as intended. The five-year supply trajectory that was adopted as part of the JCS in December 2017 was predicated on these large sites delivering significant amounts of dwellings by 2019. Despite recent progress in these sites coming forwards they will not deliver a significant volume of dwellings for some time yet. It will be very difficult for Cheltenham Borough Council to demonstrate a five-year land supply until they do. This application must be determined in this context regardless of how recently the Cheltenham Plan was adopted or other outside factors.
- 6.16 As mentioned above, the application site is designated land and lies wholly within the Cotswold AONB. The site's designated status means that NPPF paragraph 11(d) (i) and (ii) apply; planning permission should be granted unless policies in the NPPF that protect areas or assets of particular importance provide a clear reason for refusing the development proposed or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies of the Framework.

- 6.17** Paragraph 172 of the NPPF states that *'great weight should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues'*. The scale and development within an AONB should be limited and planning permission refused for major development other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest. Paragraph 172 goes on to advise that consideration of such applications should include an assessment of:-
- *The need for the development, including in terms of any national considerations and the impact of permitting it, or refusing it, upon the local economy;*
 - *The cost of, and scope for, developing outside the designated area, or meeting the need for it some other way; and*
 - *Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated*
- 6.18** In addition, there will need to be consideration of NPPG guidance which states that AONBs *'are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas'*.
- 6.19** Each of the points raised by paragraph 172 and the extent to which the proposed development adheres to the Framework policy will be discussed in turn.
- 6.20** Whether a proposal constitutes major development within an AONB is a matter for the decision maker. In this case, the proposed development constitutes major development by virtue of the number of dwellings proposed, the location, size and setting of the application site and the potential significant visual and landscape impacts arising from the proposals which in turn would have an adverse impact on the purposes for which the area has been designated (NPPF Footnote 55).
- 6.21** Therefore, the first step in considering this application is determining whether exceptional circumstances exist which would outweigh the great weight attached to conserving and enhancing the AONB. If exceptional circumstances exist, the considerations should then take into account whether the development is in the public interest.
- 6.22** The 'exceptional circumstances' put forward by the applicant include the provision of housing (including affordable housing) and its contribution to the Council's housing land supply and local housing needs. From the applicant's perspective, the need for the development in terms of any national considerations and impact on the local economy appear to be justified on this basis.
- 6.23** Officers consider that housing provision and the contribution of 250 dwellings towards meeting housing land supply requirements is significant but cannot on its own be an exceptional circumstance. The shortfall in housing land supply could be met via the development of other sites within the JCS area, including allocated sites for housing. The shortfall in housing land supply should not necessitate the release of land within the AONB, particularly at the scale proposed.
- 6.24** In this regard, the applicant has not explored fully the cost or scope for developing outside of the AONB or meeting the need for it in some other way. Therefore, it has not been demonstrated that the need for housing cannot be provided elsewhere.
- 6.25** The ES concludes that whilst there would be harm to the AONB, the proposed mitigation/moderation of any detrimental effects on the AONB would offset that harm. The impacts of the proposed development on the landscape qualities of the AONB are discussed in full in section 6 of this report.

6.26 Furthermore, officers have not considered the 3 individual points for assessment included in NPPF paragraph 172 in any order of importance (in terms of the weight that should be attached to them), and nor do officer consider that the assessment should be limited to the criteria listed.

6.27 In light of the above policy background, the acceptability of the proposed development and principle of residential development on this site must be considered very carefully.

6.28 Impact on AONB

6.29 The application site is located within the Cotswolds AONB Landscape Character Type 2 (Escarpment) and Landscape Character Area 2c (Escarpment: Coppers Hill to Winchcombe).

6.30 JCS Policy SD7 states that:-

All development proposals in or within the setting of the Cotswolds AONB will be required to conserve and, where appropriate, enhance its landscape, scenic beauty, wildlife, cultural heritage and other special qualities. Proposals will be required to be consistent with the policies set out in the Cotswolds AONB Management Plan.

6.31 Policy L1 of the Cheltenham Plan states that ‘*development will only be permitted where it would not harm the setting of Cheltenham including views into or out of areas of acknowledged importance*’. The supporting text to L1 emphasises the need to continue the protection of the town’s setting and encourage its future enhancement through sensitively designed and located development; and in doing so protect views into and out of the AONB. Paragraph 8.3 of the Cheltenham Plan comments on the particular importance of protecting the scarp as the dominant feature of Cheltenham’s setting; the Council concerned at the cumulative effect of even small-scale development and of development in new locations within the AONB.

6.32 Policy CE1 of the Cotswolds AONB Management Plan 2018-23 requires:

1. Proposals that are likely to impact on, or create change in, the landscape of the Cotswolds AONB, should have regard to, be compatible with and reinforce the landscape character of the location, as described by the Cotswolds Conservation Board's Landscape Character Assessment and Landscape Strategy and Guidelines.

2. Proposals that are likely to impact on, or create change in, the landscape of the Cotswolds AONB, should have regard to the scenic quality of the location and its setting and ensure that views - including those into and out of the AONB - and visual amenity are conserved and enhanced.

6.33 Policy CE3 says:

1. Proposals that are likely to impact on the local distinctiveness of the Cotswolds AONB should have regard to, be compatible with and reinforce this local distinctiveness. This should include:

- being compatible with the Cotswolds Conservation Board's Landscape Character Assessment, Landscape Strategy and Guidelines and Local Distinctiveness and Landscape Change;
- being designed and, where relevant, landscaped to respect local settlement patterns, building styles, scale and materials;
- using an appropriate colour of limestone to reflect local distinctiveness.

2. *Innovative designs - which are informed by local distinctiveness, character and scale - should be welcomed.*

- 6.34** In 2015 the Council undertook a review of the AONB in support of the emerging Cheltenham Plan. This review is published in the Landscape Character, Sensitivity and Capacity Assessment of the Cotswold AONB within Cheltenham Borough (April 2015/updated May 2016) (2015 Ryder report). The application site falls within Local Character Area 7.1 of this document, Oakley Farm Pasture Slopes.
- 6.35** The report concludes that the overall landscape constraint for the character area is major. It considers the site to have a high visual sensitivity and the landscape value to be high. The resulting overall landscape capacity is 'low'. There has been no material change to the landscape character of the site since this assessment.
- 6.36** It is also interesting to note that a section at the far west of the application site was not originally included in the AONB designation. It was added in 1990 when AONB boundary amendments took place. This suggests that the overall landscape sensitivity of the site has increased over the years.
- 6.37** The 2015 Ryder report and its findings are a material consideration in the determination of the proposed development. It provides a useful starting point in which to establish whether the development compromises the principles of conserving the landscape and scenic beauty of the AONB.
- 6.38** Landscape Visual Impact Assessment (LVIA) / Ryder Reports
- 6.39** Section 6 of the ES includes a comprehensive LVIA. This is supplemented by a series of photomontages of the site, including before and after views taken from several vantage points and demonstrating the visual impacts of the scheme at various points in time post development.
- 6.40** The Council's appointed Landscape Architect has provided an overview summary of the landscape section of the ES and has also undertaken an independent landscape impact appraisal of the proposed development (Ryder Overview and Appraisal). He has also commented on the photomontage images provided more recently.
- 6.41** The applicant states clearly within several submitted documents that the landscape and visual effects of the development proposals would result in the loss of sloping pasture which makes a contribution to local landscape character and visual amenity. Officers do not disagree with this statement. However, the applicant considers that the harm would be limited by the extent to which the area is already influenced by existing development, mitigation through retained vegetation and natural topography and the separation of the application site from the wider escarpment landscape and wider AONB. These comments and opinion are not agreed with.
- 6.42** The Ryder Overview concludes that many of the judgements made in section 6 of the ES are under reported in terms of the rating of significance of both landscape and visual effects. A number of visual and landscape receptors are graded by the Ryder Appraisal as receiving a greater degree of effect; the Appraisal considering that Moderate, Adverse and Permanent combined and long term landscape and visual effects would occur to the Oakley Farm Pasture Slopes Landscape Character Area. The Oakley Farm landscape effect would remain higher at Moderate/Major, Adverse and Permanent. This is in contrast to the Minor/Moderate, Adverse and Residual/Temporary effects identified in ES Section 6. The Ryder Overview also comments that there is no conclusion on whether the effects are significant with regards to the overall ES Methodology.

- 6.43** The Ryder Overview challenges the ES conclusions on the cumulative and in-combination effects of the proposals including matters relating to the openness of the site. Ryder considers that the site remains open over the green roof of Hewlett's Reservoir which is evident in views from the escarpment to the east. The applicant contends that the site is now an isolated parcel of land due to the Oakley Grange development. Similarly, the applicant suggests that the proposed development would consolidate the Oakley Grange site. Ryder considers that this consolidation should be read as enlargement, or compounding adverse landscape and visual effects and reducing remaining open green space from a wedge to a finger.
- 6.44** The Ryder Appraisal comments on the mitigation and enhancement measures of the proposed development and the over reliance on the proposed mitigation of the east/west tree belt and remnant pasture slopes being able to mitigate all visual landscape and visual effects. Inherent mitigation (the remnant pasture slopes) would leave only a narrow finger of green, open space. Neither would retention of some pasture create a rural landscape, as suggested. The remaining open land would be too small a scale and would accommodate the access and winding estate road into the development with associated lighting and highway infrastructure. Ryder also considers that the proposed enhancements are not all landscape or visual but are targeted at recreation and access. This area could resemble an urban parkland rather than the current intrinsic landscape qualities and character of the lower slopes of the escarpment. Generally, the ES fails to recognise the changed context to landscape elements such as trees and hedgerows, arising from the urbanising effects of constructing 250 houses. The adverse impacts on some views of the site are also considered to be underestimated, particularly the view from Priors Road/Sainsbury's.
- 6.45** It is acknowledged that concentrating built form on the lower parts of the site would potentially result in less harm to the landscape character of the AONB. However, this needs to be balanced against the harmful and damaging effects of the proposed main access into the site from Harp Hill and the mitigation proposals which would change the character of this site from rural to suburban. Ryder comments specifically on the importance of reading the landscape character of the site as a whole; the site appearing as an identifiable landscape unit and not sub-divided into lower and upper parts.
- 6.46** Ryder has provided further comment on the observations made by the applicant's landscape consultant (MHP) on the Council's Landscape Appraisal. An initial response is also provided with regards the submitted photomontage images which are intended to represent the landscape and visual effects of the proposed housing development. These responses will not be reproduced or discussed in detail here. However, in summary, there is disagreement over the change in character and natural qualities of the site as a whole and of the upper and lower parts of the site. There is also disagreement over the impact on views and the long term effects on views arising from the proposed tree belt across the site. Winter views are not included within the photomontage set and there is some concern about the illustrated tree growth in some views, alongside the lack of any street lighting, furniture, signage or vehicles within the photomontages. Of note is the level of visibility of proposed houses at Year 1 and to only a small part of the AONB scarp beyond; a view which would be lost at year 10 following established tree growth within the site.
- 6.47** In addition to the above comments and photomontage viewpoints, it is also apparent that the application site is clearly visible (in almost its entirety) from public footpath 118, accessed via the B4632 Winchcombe Road below Queens Wood, Southam. The visual impact of the proposals from this vantage point is considered to be significant. The proposed dwellings rising up the site, combined with the proposed tree belt across the full width of the site, would mean that the proposed retained section of upper slopes and the backdrop of the lower scarp landscape further south would be largely lost from public view along this footpath link. From this viewpoint, the proposals would read as a continuation of built development from the north and west. The existing green wedge and the more or

less, seamless visual connection to the lower slopes of the escarpment would be lost from public view.

6.48 The Cotswold Conservation Board also include photographs of a number of other public viewpoints from which the site (and proposed development) is clearly visible.

6.49 Cotswold Conservation Board

6.50 The Cotswolds Conservation Board (CCB) and CPRE both raise objections to the proposed development. Their comments and concerns are set out in full in section 4 of the report.

6.51 CCB reiterate much of the policy context and 'exceptional needs' test implications outlined in paragraph 6.17 above and largely mirror the conclusions reached by the Ryder reports and Conservation Officer. As such, CCB's representations should be read in conjunction with the Ryder Appraisal and relevant officer comments.

6.52 CCB comment that the site *is unimpaired by its proximity to urban development and is commensurate with the landscape quality in other parts of the Cotswolds AONB. The site is highly visible and a prominent feature when seen from nationally, regionally and locally important viewpoints, in particular the Cotswold Way National Trail. It provides an important 'green wedge' that extends the natural beauty of the Cotswolds AONB landscape into the urban area of Cheltenham..... Consideration of 'public interest' should take into account the fact that AONBs are areas whose distinctive character and natural beauty are so outstanding that it is in the nation's interest to safeguard them'.*

6.53 Whilst acknowledging that there is built development immediately to the north, west and south of the site, CCB point out that there was built development in these locations prior to the AONB boundary review in 1990 and before designation of the AONB. The footprint of surrounding development has not increased since designation; the former GCHQ site arguably more incongruous than the subsequent Oakley Grange development. CCB also considers that the development is likely to have significant adverse impacts on the tranquillity of the Cotswolds AONB, particularly with regards to the number of vehicle movements within and adjacent to the AONB. Similarly, whilst the proposals may enhance biodiversity within the AONB, CCB considers that these measures could undermine the existing landscape character of the site.

6.54 In summary CCB considers that the proposed development would:-

- fail to maintain the open, dramatic and sparsely settled character of the escarpment;
- intrude negatively into the landscape and could not be successfully mitigated;
- fail to conserve the pattern of settlement fringing the lower slopes of the escarpment; and the settlement's existing relationship to the landform; and
- adversely affect settlement character and form.

6.55 CCB also discusses the visual impacts of the development from various key view points and considers the proposed mitigation. Matters relating to housing need (ref Policy CE12 of the Cotswold Area Management Plan) within the AONB are also addressed.

6.56 In light of the above (and full representation), CCB considers that the proposals conflict with the Cotswold AONB Landscape Strategy and Guidelines and Cotswold AONB Management Plan 2018-23.

6.57 CPRE Gloucestershire

6.58 The CPRE raise very similar concerns to those of CCB and in addition provides detailed comments on transport, access and social cohesion related matters and CBC's latest

housing land supply status; referring to the fall in anticipated yield from strategic sites within the review period and the extent to which weight should be attached to housing land supply in decision making. These issues are discussed broadly within the corresponding sections of this report.

6.59 Natural England

6.60 Natural England (NE) objects to the proposed development and their representations are set out in full in section 4 of this report. Their concerns are focused on the significant landscape and visual impacts of the proposed development on the AONB and the application site not being allocated within the Cheltenham Plan.

6.61 NE also provides additional advice on European designated sites i.e. the Cotswolds Beechwoods Special Area of Conservation (SAC). Both HE and the Council's ecology advisor have reviewed the applicant shadow Habitats Regulations Assessment (HRA). Natural England raises no objection to the HRA subject to appropriate mitigation being secured in the form of Homeowner Information Packs; providing information on recreation opportunities and sensitivities of local and designated sites, including nearby SSSIs.

6.62 Conclusion

6.63 The submitted details include inconsistencies in the applicant's views and conclusions on the impact of the proposals on the AONB. The ES acknowledges harm (and required mitigation) to the AONB whilst the Planning Statement refers to the positive benefits that would be derived from the proposal in terms of enhancement to the AONB; by relieving pressures for residential development elsewhere in the AONB and providing opportunities for this agricultural land to be managed in a way more representative of the lower escarpment.

6.64 However, in light of the Council's landscape impact review and assessment, officers conclude that the landscape and visual effects of the proposed development would be at the least Moderate/Adverse and Permanent. Proposed mitigation, which largely comprises of the retention of a section of the southern pasture slopes, retention of TPO'd trees and some hedgerow, proposed hedgerow planting and a tree belt are not considered sufficient to mitigate the identified harmful visual and landscape effects of the proposed development; the proposed mitigation measures considered to alter the character of the site as a whole and result in harm to the AONB in themselves.

6.65 Ecology/Biodiversity

6.66 Section 7 of the ES covers the ecological implications of the proposed development and includes a Preliminary Ecological Appraisal and Habitats Regulations Assessment (HRA) (for the Cotswold Beechwoods Special Area of Conservation (SAC)), as requested by Natural England and in accordance with the Conservation of Species and Habitats Regulations 2017. The applicant's shadow HRA considers the recreational pressures on the SAC arising from the proposed development. The applicant's ecological appraisals include a number of surveys, including bat roost inspections, hedgerow surveys, reptile and breeding birds surveys.

6.67 The ecological appraisals and section 7 of the ES should also be read in conjunction with the submitted illustrative masterplan, landscaping strategy and Arboricultural Impact Assessment.

6.68 The Council's Ecology advisor (CE) as reviewed these documents and provides the following summary and recommendations.

6.69 No badger setts or reptiles were recorded on site. Bat activity was recorded across the site and one mature Oak tree functions as a summer day roost for a single bat. This tree

is shown as being retained within the indicative landscaping scheme. Other trees within the site that are identified as suitable for bat roosting are also shown as retained. Mitigation measures for all protected species identified on the site should be detailed in a Construction Ecology Management Plan (CEMP) which should include a lighting plan.

- 6.70** The development would result in the loss of some mature hedgerow and semi-improved grassland. Although veteran trees would be retained, care needs to be taken to ensure that both veteran trees and their root protection areas are protected during construction and landscaping. The planting of native trees and shrubs is welcomed but details of implementation and management would need to be considered and included in a 10 year Landscape and Ecology Management Plan (LEMP). This plan should also include enhancement measures for wildlife, e.g. bird/bat boxes, hedgehog shelters.
- 6.71** The shadow HRA concludes that, given the distance between the application site and Beechwoods and the number of other recreational opportunities available closer to the site, there should not be any significant effects on the Beechwoods SAC, either alone or in combination with other planned development. However, the applicant is willing to provide Homeowner Information Packs (HIP) for all occupiers. The HIP should inform residents of local green space options, in addition to highlighting the sensitivities of nature conservation sites including Beechwoods. The Council's ecologist considers that the proposed development would not likely affect the integrity of the Beechwoods SAC, either alone or in combination with other development and thus meets the test of the Habitats Regulation 2017.
- 6.72** Notwithstanding the above requests for additional information, the CE concludes that the proposed development will need to show a Biodiversity Net Gain (BNG), details of which will need to be submitted to the LPA prior to determining this application.
- 6.73** In response to the CE's requests for additional information, the applicant has submitted a CEMP, LEMP and briefing note on Biodiversity Net Gain.
- 6.74** Using appropriate (DEFRA) methodology, the applicant has demonstrated that the proposed development can deliver a positive BNG. This is based on the submitted illustrative masterplan for the site (ref 333.P3.9 REV E). This equates to an increase in habitats and hedgerow resulting from the provision of new wildflower grassland, SUDS features, enhanced hedgerows and new landscape planting. Additional enhancements would also be provided, that are not accounted for in the calculations e.g. bat and bird boxes and log piles.
- 6.75** The Council's Ecologist has reviewed the CEMP and LEMP plus the submitted lighting plan. The CEMP and LEMP together are considered to give sufficient level of detail as to how the ecological features on site would be protected and specify the ecological enhancement opportunities, as shown on the indicative landscape plans. However, no reference is made to hedgehog tunnels built into base of fences. This would need to be added to the CEMP/LEMP to ensure connectivity for hedgehogs across the site.
- 6.76** No objection is raised subject to the development being carried out in accordance with the guidance/recommendations set out in the above documents and as shown on the indicative landscaping/lighting plans. These matters could be dealt with via planning conditions.
- 6.77** Gloucestershire Wildlife Trust also conclude that it is unlikely the development would have a significant impact on designated biodiversity sites, priority habitats, threatened species or ecological networks. However, due to the size of the development the Trust recommends that opportunities for ecological enhancement through the provision of high quality Green Infrastructure should be included in any future scheme.

6.78 Trees

- 6.79** The application site contains a number of TPO'd trees which include the majority of the veteran and mature Oak trees within the site. There are also other trees and mature hedgerow within the site, which form parts of the field parcel boundaries.
- 6.80** The Council's Trees Officer (TO) has reviewed the application and his response is set out in full in section 4 of the report.
- 6.81** Given the presence of Ash trees across the site the overall tree population and canopy spread is likely to be reduced in the long term, which could affect the character of the site. This will need to be considered in any future planting scheme. The TO also suggests that the southern slopes could be more heavily planted with trees due to their steep gradient and being less suitable for traditional recreational/play activity.
- 6.82** The TO acknowledges that the proposals do not involve the removal of TPO'd trees within the site; the trees appearing to present a significant design and layout constraint. However, the proposals do involve substantial tree removal across the site and as such a tree removal and retention schedule and map plus Arboricultural Implications Assessment were requested prior to determination of this application. This would enable a more accurate assessment of the overall net gain of trees and shrubs (in terms of canopy cover and not tree/numbers removed versus planted).
- 6.83** It was also noted that, whilst the areas proposed for open space and natural play provision is welcomed, many of the retained trees in the more densely wooded areas are over-mature and/or are Ash. As such their long term future is limited and are not considered suitable for natural play provision. Some of the protected TPO'd trees are also proposed to be built around. Whilst built development may fall outside of Root Protection Areas, they could become a visual focus for adjacent dwellings and there is concern that the areas beneath the canopies could become play areas, resulting in requests for inappropriate heavy pruning. This can be difficult to resist, especially if there are repeat requests for pruning works. Similarly, the enforcement/policing of casual vandalism/damage resulting from play would be difficult.
- 6.84** The clay subsoil on this site has also been raised as a concern, in relation to tree roots and proximity to dwellings. This could also result in requests for future tree removal. A clay soil would also necessitate a carefully chosen palette of tree/hedge species for future planting. Appropriate foundations design would need to take account of this shrinkable clay soil so as to prevent the likelihood of subsidence and resultant requests for tree removal or heavy pruning.
- 6.85** In response to the concerns raised, a Tree Removal and Retention Plan and Arboricultural Implications Assessment were subsequently submitted and reviewed by the TO.
- 6.86** The TO accepts that whilst inappropriate pruning can be controlled through the TPO process, requests for pruning could be reduced by fencing and barrier planting using thorny species such as hawthorn, dog rose, bramble, holly etc.; the detail of which should be included in short, medium and long terms management plans for the trees and the open spaces. Similarly, detailed pruning, foundation design and planting species can be considered at reserved matters stage.
- 6.87** The Woodland Trust also raised some concerns about the potential for damage or loss of veteran trees within the site and the location of these trees not being marked clearly on any submitted plans. The applicant's Arboricultural advisor has identified eight trees as veteran specimens and a further three trees that are likely to become veterans in the future. The Trust are concerned that there are no plans to indicate that the development will ensure the retention of these veteran trees or provide veteran tree buffers as required by Natural England's standing advice and having regard to paragraph 175 of the NPPF,

which seeks to prevent the loss or deterioration of irreplaceable habitats such as ancient woodland and ancient or veteran trees.

6.88 The revised Arboricultural Assessment addresses the Trust's concerns; the Council's Tree Officer confirming that all veteran trees within the site would be retained. The extent and suitability of any proposed tree buffers would be a consideration at reserved matters stage.

6.89 Heritage, Conservation and Archaeology

6.90 Cultural heritage matters are discussed in Section 8 of the ES which provides an assessment of both archaeological and built heritage features within the site and a 1km study area surrounding the site.

6.91 Built Heritage Assets

6.92 The application site lies adjacent to the grade II listed Hewlett's Reservoir; the walls and embankment of the reservoir forming part of the south east site boundary. There are a number of heritage assets located within the reservoir complex including two underground reservoirs, an ornamental octagonal pavilion, Cotswold stone gate piers, cast iron gates and brick boundary walls and all are grade II listed. The adjoining Stone Lodge which faces onto Harp Hill is also listed due to its association with Hewlett's reservoir. The reservoir complex is described in the list description as forming a good group of buildings with group value.

6.93 Other notable heritage assets are located nearby but are not considered to be significantly affected by the proposals and these include (Scheduled Monument) Hewlett's Camp to the south, the grade II listed Bouncer's lane Cemetery Park and Garden and Cemetery Chapels. There would be very limited change to the setting of Battledown Camp, which is already compromised by surrounding built form.

6.94 The non-designated historic agricultural buildings within the site are in a poor state of repair and are considered of low value. Their loss is considered to be acceptable.

6.95 The applicant acknowledges that the site forms part of the open landscape surrounding Hewlett's Reservoir and therefore forms a buffer between the reservoir and the rest of the built up area of this part of Cheltenham and provides a feeling of rurality which makes the assets stand out in their isolated setting. Whilst the applicant acknowledges that there would be some effect on built heritage assets, this would not result in any significant effects; their value deriving from their architectural, technological and historical value and their group value rather than their setting. The contribution made by the application site is secondary to the significance of the assets. However and somewhat conversely, the applicant accepts that, post development, the setting of the listed buildings would be permanently altered through the erosion of their rural setting. Without mitigation, there would be an adverse effect on setting through the introduction of built form and associated noise and light pollution. The applicant acknowledges further that by bringing built development closer to the Reservoir complex this would remove some of the remote experience of the asset and to some degree reduce its visual impact within an open rural context.

6.96 Proposed mitigation for the above identified adverse effects is in the form of the retained (buffer) area of southern pasture slopes.

6.97 The applicant also considers that there would be no further cumulative adverse effects on heritage assets from other recent, completed and planned development. However, it would seem that the applicant has not considered fully the cumulative effects of the proposed development on heritage assets; other than acknowledge that the proposed

development would further erode some of the rural setting which surrounds the assets but would not increase the significance of effect on the assets.

- 6.98** The Conservation Officer has commented on the proposals and his response is set out in full in section 4 of the report. In this case, the CO has considered the impact of the proposals on the setting of the heritage assets within Hewlett's Reservoir. The CO notes that the immediate setting of the Reservoir is rural, defined by tree and hedgerow lined fields, with wider views of the suburbs of Cheltenham to the west and open countryside to the east; this setting only somewhat compromised by modern housing development abutting the northern boundary. The CO considers that despite this modern housing development, Hewlett's Reservoir retains much of its rural setting and exhibits a verdant and open character.
- 6.99** The CO considers that the proposed development would have a harmful impact on the setting of the designated heritage assets within Hewlett's Reservoir. The proposed housing would intrude into important views to the north west of Hewlett's Reservoir and as a result would adversely affect how the heritage assets are experienced within their rural context. Taking into account the adverse impacts of the existing housing development abutting the Reservoir's northern boundary, the proposals would have a cumulative adverse impact on the rural setting of Hewlett's Reservoir. The CO acknowledges the proposed tree belt would act as a visual screen and create a recreational area/meadow adjacent to Harp Hill, but this is considered an inadequate attempt to mitigate the impact of the proposed development on the setting of the heritage assets.
- 6.100** In light of the above, the CO concludes that the impact of the proposals on the setting of the heritage assets within Hewlett's Reservoir is unacceptable in heritage terms. The proposed development is considered not to sustain and enhance the designated heritage assets and are therefore contrary to Section 66(1) of the Planning (Listed Building and Conservation Area) Act 1990, Chapter 16 of the National Planning Policy Framework and Policy SD8 of the Joint Core Strategy.
- 6.101** It is noted that Historic England (HE) considers that the proposal would result in an impact to the setting of the Scheduled Monument (Battledown Camp). However, HE considers the impact to be at the lower end of the scale referred to in paragraph 193 of the NPPF as 'less than substantial'. As such, the Council will need to determine if the potential adverse impacts of the application to designated heritage assets may be out-weighed by the potential public benefits, as referred to in paragraph 196 of the NPPF. The CO however, does not consider the Scheduled Monument to be affected significantly by the development proposal due to its distance from the site and intervening development. With this in mind, the public benefits of the proposals (housing provision) would likely outweigh any adverse impacts on the setting of the Scheduled Monument.
- 6.102** Importantly (albeit not within their remit), HE note the potential for the proposed development to have a more significant impact on the setting of the grade II listed reservoirs and associated features.
- 6.103** Irrespective of whether any potential harm amounts to substantial harm or less than substantial harm, paragraphs 193 and 194 of the NPPF require that great weight should be given to the assets' conservation and any harm to the significance of the assets (including from development within its setting), should require clear and convincing justification.
- 6.104** The proposed development is considered to cause less than substantial harm to the significance of the heritage assets. With reference to NPPF paragraph 196, officers consider that the public benefits arising from the proposals (i.e. housing provision), would not outweigh the harm caused to the significance of the heritage assets. Similarly, officers

consider that the applicant has not provided adequate justification for the harm caused to the significance of the designated assets.

6.105 Archaeology

6.106 The applicant has undertaken an Archaeological Desk Based Assessment (July 2019) plus Geo Physical Survey Report (May 2019) which did not identify any specific archaeological features other than ridge and furrow cultivation earthworks which are evident across the majority of the site.

6.107 A more detailed Archaeological Evaluation report/survey in December 2019 recorded a limited number of archaeological features in the 26 trenches excavated that may be impacted upon by the proposed development (Appendix 8.4 of the ES). These features are considered by the applicant to be of low to negligible sensitivity and would be completely removed during the construction phase of the proposed development.

6.108 An assessment has also been carried out in relation to Battledown Camp (Scheduled Monument).

6.109 The applicant has discussed the scope of the archaeological assessment and significance of the archaeological assets identified with the County Council Archaeologist who has also carried out a subsequent review of the relevant information presented in the ES.

6.110 The Archaeological Evaluation concludes that the site produced a single dated archaeological feature; a small gully that contained a small amount of later prehistoric pottery. A few other widely separated and undated features were recorded. The report concludes that the lack of density of features indicates outlying activity away from any settlement foci.

6.111 In light of the above the County Archaeologist considers there to be low risk that significant archaeological remains would be affected by the proposed development. As such, no further archaeological mitigation or recording is required in connection with the proposals.

6.112 Access and Highway Issues

6.113 This application seeks approval for the means of access into the site to serve 250 houses, and is supported by a Transport Assessment, Travel Plan, Preliminary Access Arrangements Plan and an Access and Movement Parameter Plan which identifies the highway corridor flexibility zone, proposed pedestrian and cycle way links, existing public rights of way and emergency access points.

6.114 Gloucestershire County Council, acting as Highway Authority has undertaken a full assessment of the proposals, having reviewed section 9 of the ES, Transport Assessment (Appendix 9.1), Travel Plan, the TA addendum and Technical Note. ES section 9 is informed by the technical elements of the TA and considers the environmental effects of the proposed development (during both construction and operational phases), the cumulative and in-combination (air quality and noise) effects and any mitigation measures as necessary.

6.115 The ES concludes that with the implementation of the proposed mitigation and enhancement measures, including the implementation of the residential Travel Plan, the additional traffic demand would be safely and satisfactorily accommodated on the local transport network. The applicant considers that the overall residual effect, in transport terms would be *Minor to Moderate Beneficial*.

6.116 The mitigation and enhancement measures identified include implementation of the Residential Travel Plan and mitigation by design proposals i.e. the new site access

junction would be designed in accordance with the Design Manual for Roads and Bridges, Manual for Streets and local authority design guidance to ensure that the access is safe and suitable. In addition an emergency access via the existing farm track is proposed and the internal road layout would be designed to facilitate walking and cycling links to existing routes. A pedestrian and cycle link is also proposed between the application site and the B407 Priors Road along the existing farm track.

- 6.117** Financial contributions would be made towards improving bus services, improvements to the B4075 Priors Road/Hales Road/Harp Hill/Hewlett Road double roundabout, the provision of a new section of footway on the north side of Harp Hill (linking Footpath 86 to the existing footway on Harp Hill) and an uncontrolled pedestrian crossing facility on Harp Hill, a controlled Toucan crossing on Priors Road and a section of shared footway/cycleway on the west side of Priors Road to link with existing cycle routes. Mitigation during the construction phases would be dealt with by way of controls imposed by planning conditions.
- 6.118** The Highway Authority has raised a number of significant concerns in relation to the proposed access arrangements, TA findings and subsequent TA addendums. His responses are set out in full in section 4 of the report.
- 6.119** In summary, insufficient detail (tracking and dimensions) was first submitted for the proposed bellmouth main access into the site. The gradient of the access road was considered unacceptable; the indicative site sections revealing significant challenges and contrary to Manual for Gloucestershire Streets which requires that 1 in 12 gradients should not exceed 30m in length.
- 6.120** In accordance with the Scoping Opinion, the TA assesses several junctions, in particular the junction of Harp Hill/Priors Road/Hewlett Road. The Highways Officer does not agree with the mitigation scheme for this junction, the modelling forecasts nor the form the scheme's delivery. As such, the proposed development would result in significant capacity erosion at this junction. The modelling results also showed unmitigated harm at other junctions, including Priors lane/Bouncers Lane and A40/London Road. The Highway Authority has also recommended that an assessment year of 2031 (to coincide with the local plan period) and an alternative modelling tool is used. In addition, the submitted Travel Plan is considered to lack ambition and requires revision.
- 6.121** The submitted TA Addendum (TAA) did not address the above issues. The TA Addendum continues to include a 2024 assessment year which would not adequately account for future growth and therefore would underestimate the impact on the highway network. The proposals continue to show shared use facilities (pedestrian/cycle) as the primary way in and out of the site, on connections within the site and in the surrounding highway network. Relevant guidance advises that the use of shared facilities should be a last resort design solution.
- 6.122** Notwithstanding the revised tracking details, the design of the access road continues to show large radii, excessive road widths and unacceptable gradient; the access not conforming to Manual for Gloucestershire Streets. Further modelling demonstrates that the proposed development would result in increased queue lengths at the junction of Priors Road/Harp Hill/Hales Road/Hewlett Road. The modelling also does not take account the 2031 plan period and the applicant has failed to carry out their own junction analysis or microsimulation of the impacts.
- 6.123** The Highway Authority also considers that more consideration is needed with regards bus service provision and improving existing services with subsequent infrastructure improvements at the Sainsbury's bus stops.
- 6.124** The more recent submitted Technical Note (TN) does not address the previous concerns outlined above. Despite some further information on microsimulation modelling, the

Highways Authority concludes again that the impact on the Priors Road/Harp Hill/Hales Road/Hewlett Road junction would be unacceptable and severe. The modelling shows increased delay and queue length in the 2024 scenario and direct mitigation is not proposed. Similarly, the assessment of traffic delay at the Priors Road/Bouncers Lane and Prestbury Road/Tatchley Lane/Deep Street/Blacksmith Lane/Bouncers Lane junction is inadequate. In addition, the TN does not adequately address the identified significant impact at the A40 London Road/Old Bath Road/Hales Road. Shared pedestrian/cycle facilities are still proposed and details of the design of off-site mitigation proposals are lacking.

- 6.125**The proposed access off Harp Hill has not been designed in accordance with Manual for Gloucestershire Streets. The access is excessive and has not been designed to provide safe and suitable travel infrastructure. The Highway Authority has no confidence that the desired 1 in 20 gradient can be achieved; the applicant proposing long lengths of 1 in 12.5. The site topography continues to present significant challenges and, on the basis of the information submitted, the Highway Authority does not consider that a future proposal (including reserved matters) would be able to achieve a suitable layout.
- 6.126**The distance to bus stops remains unacceptable, the indicative routes to bus stops are unsuitable and existing bus stops require enhancement.
- 6.127**In summary, the Highway Authority concludes that the TA, TA Addendum and Technical Note have not addressed the cumulative impact of development and future traffic growth for an appropriate future year. The impacts of the proposed development on the highway network are considered to be severe and would fail to provide a safe and suitable access for all users. The proposals therefore conflict with paragraphs 108, 109 and 110 of the NPPF, policies INF1 and INF4 of the JCS, LTP PD 0.3 and 0.4 of the Local Transport Plan and Manual for Gloucestershire Streets. The Highway Authority recommend that the application is refused on highways grounds.

6.128 Drainage and Flood Risk

- 6.129**Matters relating to hydrology, drainage and flood risk are set out in Section 12 of the ES. Surface water and ground water features of the site are discussed alongside proposed mitigation strategies for any potential effects during both construction and operational phases of the development and a review of any residual significant effects. The cumulative effects of existing, approved and proposed development within the area have also been considered. A Flood Risk Assessment (FRA) and Drainage Strategy for the management of surface water is included in ES Appendix 12.1.
- 6.130**The application site lies wholly within Flood Zone 1 (low probability of fluvial flooding). Environment Agency mapping indicates that the north east section of the site is at risk of reservoir flooding (from Severn Trent Water Ltd Hewlett's Reservoir). Also according to EA mapping and the surface water management plan produced for the Priors Oakley Flood Alleviation Scheme led by the County Council, there is some risk of surface water flooding to the site during the 1 in 100 year rainfall event. There is no known historical reported surface water flooding of this site but properties downstream of the site and Wymans Brook have experienced flooding historically. The site could also be affected by overland flows onto the site from elevated land to the south east. An ordinary watercourse/ditches (not a main river) runs adjacent to the northern site boundary and there are two internal ditches and a surface water drain within the site.
- 6.131**The FRA identifies that the major adverse risk arising from the proposed development is surface water run-off, both on-site and downstream. The construction phase could also give rise to temporary minor adverse effects on water quality.

- 6.132**The FRA concludes that the development is safe from flooding and flood risk would not be increased downstream and that the overall flood risk in the area would be reduced. The use of SuDS as mitigation would manage and reduce flood risk and would ensure that there is no adverse effect on water quality. The FRA identifies a minor beneficial effect of the proposed development on flooding and surface water drainage.
- 6.133**Subject to Severn Trent approval, foul sewerage could be accommodated and any effect on existing sewerage infrastructure would be negligible. The cumulative effects of the proposed development and existing development are considered to be negligible with a minor beneficial effect on hydrology, drainage and flood risk identified. Reservoir flooding is also extremely unlikely to occur; the northern reservoir has been infilled albeit the southernmost reservoir is still operational. In the unlikely event that the reservoir did flood, flood water would drain naturally towards the site and be collected by the existing internal land drainage ditches.
- 6.134**The Environment Agency (EA), Severn Trent Water and the County Council acting as Local Lead Flood Authority have reviewed the submitted information; all three having provided detailed comments at the scoping opinion stage. At this stage, the applicant was advised that on site attenuation would be required for events with flow probabilities of up to and including the 1 in 100 year event (including an appropriate allowance for climate change), through the incorporation of sustainable drainage and hierarchy principles (SuDS), to balance surface water run-off to Greenfield run-off rates. An opportunity for off-site betterment in connection with Wyman's Brook flood alleviation scheme and the requirements of the Water Framework Directive (in this case maintaining the appropriate water quality status of the River Swilgate), were also noted.
- 6.135**The EA are satisfied that the environmental issues identified in their response to the EIA Scoping Opinion have been addressed by the ES and supporting Flood Risk Assessment and Drainage Strategy. Given that the site is located within Flood Zone 1 (low probability of river flooding), no objection or further comment is raised.
- 6.136**The LLFA raises no objection to the proposed development subject to the approval of any subsequent detailed drainage design which should adhere to the principles set out within the submitted drainage strategy. These matters could be dealt with by conditions, as suggested by the LLFA. The proposed drainage strategy would ensure that flood risk resulting from rainfall events would be managed on-site and that flood risk would not increase elsewhere; the strategy supported by calculations that are considered acceptable by the LLFA.
- 6.137**Severn Trent raise no objection to the proposals subject to subsequent approval of a detailed scheme for the disposal of foul and surface water.
- 6.138**In light of the above, there are no significant concerns or adverse effects arising from the proposed development that would increase fluvial food risk, surface water flood risk on or off site or comprise water quality on or off-site. Furthermore, the FRA identifies a minor beneficial effect of the proposed development on flood risk and surface water drainage.

6.139 Design and layout/Impact on Neighbouring Property

- 6.140**Matters relating to design appearance and layout are 'reserved' for future consideration. However, the applicant has provided an illustrative masterplan and landscaping strategy to demonstrate how 250 dwellings could be accommodated on this site and to illustrate the general distribution/layout of built form and soft landscaping. Various Parameter drawings are also provided to illustrate the broad concepts of access and movement, general land use, building heights and green infrastructure. The Design and Access

Statement sets out the constraints that have informed the indicative masterplan layout and includes an analysis of the character of surrounding development.

- 6.141** Essentially, the application site is split into roughly one third/two thirds land parcels. The larger northern section would accommodate the 250 houses plus SuDS feature, associated estate roads and infrastructure. The smaller southern section would accommodate a 15 metre tree belt, retained pasture slopes/recreational space, footpaths and the main access into the site, plus associated infrastructure. The main estate road within the site is circular and provides access to a number of short cul-de-sacs.
- 6.142** A number of pedestrian links to surrounding development are also shown; albeit these are limited to access onto Footpath 86 along the west site boundary, use of the existing farm track and an access point onto Harp Hill in the south west corner of the site. There is no proposed connectivity to the Oakley Grange development.
- 6.143** The proposed dwellings seem to be fairly evenly distributed across the site; the layout and provision of open and landscaped areas largely dictated and constrained by retained trees and hedgerow and heritage assets at Hewlett's Reservoir.
- 6.144** There appears to be a predominate use of terraced and semi-detached housing within the middle section of the site, where density and building height increases, and where there is a noticeable shift in character and massing in comparison with the larger detached houses located towards the site perimeters. This approach appears to respond to the character and grain of surrounding development where there is a noticeable contrast between the larger detached houses of the south east section of Oakley Grange and Wessex Drive and the smaller detached houses/plots of the remainder of the adjoining Oakley Grange development to the north. Whilst this approach is considered broadly acceptable, the uniformity of building line, density, building heights and house types and resultant street hierarchy effecting parts of the site would need further consideration. This exercise may necessitate a reduction in dwelling/building numbers.
- 6.145** The indicative site layout shows one area allocated for formal play. There otherwise appears to be a reliance on incidental areas of open space located around individual trees and tree groups, in addition to the retained southern parcel of land. A development of this size would be expected to provide more on-site opportunities for formal play.
- 6.146** Separation distances to neighbouring properties in Wessex Drive and Oakley Grange appear, on the whole acceptable with the exception of the larger detached houses located adjacent to the east site boundary. The potential impact on neighbouring properties in terms of loss of light, privacy, outlook, shading and overbearing would need to be considered at a reserved matters stage. Site topography and light pollution may also contribute to any harmful impact on the amenities of adjoining land users.
- 6.147** The submitted site section drawings seek to demonstrate the extent of groundworks proposed and the impact of site topography on the suitability of this site to accommodate a significant number of dwellings on significantly sloping ground. The site sections are not entirely clear in terms of the extent of groundworks proposed. However, what is clear, is the potential visual impact of the proposed development; the rising gradient exacerbating the visual impact of built form. These effects would be particularly evident from Priors Road/Sainsbury's and other nearby vantage points.
- 6.148** Architects Panel and Civic Society
- 6.149** The Cheltenham Architects Panel has also provided a review of the proposals and considers that there is no justification to establish this site as a residential site. Whilst a notional site development layout has been submitted with the application, and some preliminary landscape design proposals, the Panel felt that a more detailed analysis is required, in particular site sections, to show the existing site context and the impact of the

development. The very steep new roads, their position and layout, together with the housing layout, could potentially have a harmful impact on the setting.

6.150 The Civic Society (CS) objects to the proposals and considers the application to lack sufficient detail. The CS considers that the proposed development would not conserve nor enhance the AONB and would lead to adverse change to the landscape. The CS advocates increased public benefit of this area of the AONB in line with its very special conservation status. Other than visual amenity, the site could provide benefits for the community through access and management for biodiversity.

6.151 Affordable Housing and Developer Contributions/s106 Obligations

6.152 Affordable Housing

6.153 Paragraph 59 of the NPPF states that when supporting the government's objective of boosting housing land supply, the needs of groups with specific housing requirements must be addressed. Within this context paragraph 61 goes on to state that the size, type and tenure of housing needed for different groups in the community should be reflected in strategic policies.

6.154 Policy SD12 of the JCS (affordable housing) seeks the provision of 40% affordable housing in all new residential developments of 11 or more dwellings. Policy SD11 sets out that development should address the needs of the local area, including older people. This application is for 250 dwellings and therefore policy SD12 is triggered.

6.155 The application proposes a policy compliant level of affordable housing (40%); included within the applicant's Draft Heads of Terms.

6.156 The Council's Housing Enabling Officer has commented on the proposals and his comments are set out in full in section 4 of the report.

6.157 To achieve a policy compliant scheme and in line with the latest Local Housing Needs Assessment (LHNA) the Council would seek a provision of 100 affordable homes for this development with a 70/30 tenure split between social rented and shared ownership/intermediate properties. Affordable housing provision would be secured via a s106 Agreement.

6.158 Developer Contributions

6.159 Policy INF6 of the JCS states that where site proposals generate infrastructure requirements, new development will be served and supported by adequate on or off-site infrastructure and services which are reasonably related to the scale and type of development proposed. Regard to the cumulative impacts on existing infrastructure and services must also be considered. Planning permission should only be granted where sufficient provision has been made to meet the needs of the development and/or which are required to mitigate the impact of the development upon existing communities.

6.160 For a development of this nature, contributions towards education, libraries and play space provision would normally be sought. Education and libraries provision would be sought via developer financial contributions towards off an off-site provision and secured via a s106 Agreement.

6.161 Gloucestershire County Council have commented on the proposed development and set out the infrastructure and services requirements for education and libraries provision arising from the development and the contributions required to make the development acceptable in planning terms, including the means of securing these contributions via a s106 agreement. Their summary response is set out in full in section 4 of the report.

- 6.162** The GCC requested developer contributions to fund pre-school, primary and secondary school places are based on up to date pupil yield data, current school capacity and local forecast data; which provide evidence of a lack of capacity in the relevant education sectors to accommodate the additional children arising from proposed qualifying dwellings needing a place at a local school.
- 6.163** GCC's Education Needs Assessment concludes that the schools closest to the application site have no capacity showing in the relevant forecast years, despite a number of the secondary schools having already been expanded to accommodate increasing numbers. When the cumulative yield from other planned development is applied it shows a shortfall of places. There would be no spare capacity to accommodate children arising from the development and a full primary and secondary education contribution would be required. Similarly, a full Pre-School contribution would be required to extend the early years offer and address any shortfalls in the Whaddon Primary Planning Area.
- 6.164** GCC advise that the contributions have been calculated based on specific DfE multipliers and formulas relative to the numbers of children generated by this development and taking account of any existing capacity. The contributions are required to make the development acceptable in planning terms and would mitigate the impacts of the proposed development.
- 6.165** GCC point out that there are no formal mechanisms or agreed financial arrangements currently in place between CBC (as CIL Charging Authority) and GCC to fund the required strategic (education and libraries) infrastructure from CIL. In addition, GCC consider that the level of CIL charged on a development is unlikely to cover the developer contributions.
- 6.166** The applicant has subsequently challenged GCC's request for education contributions for a number of reasons. Principally, the applicant considers the calculation methods (Pupil Product Ratio) used by GCC in their Educational Needs Assessment inaccurate and 'unadopted'. The applicant has therefore carried out an alternative education needs assessment in accordance with relevant guidance and with an indication of the need for additional school places to be funded through CIL. This assessment concludes that, at present there is surplus capacity in pre-school, primary and secondary schools/sixth forms across the school planning areas. The applicant also raises a number of matters regarding CIL and s106 agreements and the appropriate mechanism for securing funds.
- 6.167** To assist officers further, GCC has provided an additional statement which lists the various documents and publications which set out pupil place needs in mainstream, state funded schools in Gloucestershire. In summary, the base forecasts of pupil yield are based on housing that has already been completed, as reported annually to GCC by Borough/District Councils. Although taken into account when planning school places, the base forecasts do not include pupil yield from anticipated, granted or speculative development. Studies undertaken by GCC in 2018 and 2019 revealed pupil ratios to be greater than the national average; the up to date pupil ratios introduced in 2019 are now being used to calculate education contributions. The revised pupil yield figures have been referenced in the updated Developer Guide (LDG), adopted March 2021. The LDG states clearly that the pupil yield ratio is reviewed annually and can be adjusted from time to time based on new information.
- 6.168** GCC also note that Cheltenham's CIL Infrastructure Funding Statement (IF) indicates that no CIL has been spent on education, and as far as GCC is aware, no CIL is proposed to be allocated by CBC or the other JCS authorities towards education infrastructure. As such, GCC conclude that the education needs arising directly from the proposed development would not be funded by CIL and would therefore need to be secured by way of a s106 obligation (which is regulation 122 compliant).

6.169 These matters of disagreement between applicant and GCC remain unresolved and cannot be addressed fully during the course of determining of this application. It is anticipated therefore, that discussions between the County Council, applicant and CBC officers will continue.

6.170 Environmental Pollution and Site Contamination

6.171 The ES includes various reports covering air quality, noise and vibration effects, waste minimisation, ground conditions and contamination risk. The submission also includes an Agricultural Land Classification survey; the agricultural land quality at this site identified as mostly 3b (moderate quality) with isolated areas of 3a (good quality).

6.172 The Council's Environmental Health team has reviewed all documentation and considers the information submitted acceptable with no grounds for objecting to the proposals at this outline stage, subject to conditions relating to construction management, external lighting and asbestos removal/mitigation.

6.173 Air quality (ES section 10)

6.174 Having considered both the site specific effects and the cumulative and in-combination effects of sites within 500m of the application site, the most likely impacts on air quality (without mitigation) are likely to arise from dust emission during construction. The effects of additional road traffic on air quality were also not found to be significant and no specific mitigation is required. A number of recommendations for mitigation are suggested within the ES which include a Dust Management Plan, the setting back of properties from roads by 70m and provision of a Travel Information Pack for new residents in addition to the proposed cycle and pedestrian access to the proposed development.

6.175 The specific measures to minimise dust impacts are set out in Appendix 10.5 of the ES.

6.176 Noise and vibration (ES section 11)

6.177 The applicant has carried out a noise assessment for the proposed development which has considered the potential effects during construction and operational stages on existing noise sensitive receptors and future occupiers. Potential cumulative and in-combination effects have also been considered.

6.178 The construction phase of the development is likely to result in short term adverse effects upon existing residents in close proximity to the site. Appropriate mitigation and control measures for noise and vibration during construction works could be secured via suitably worded conditions (Construction Environmental Management Plan CEMP).

6.179 The noise assessment also concludes that the additional road traffic would result in no significant adverse effects. Traffic flows on roads directly adjacent to the site are anticipated to increase by more than 10% and would result in increases in noise levels up to 1.3 dB(A). These calculations also take account of the cumulative effects of the proposed development. Traffic flows on surrounding road links are anticipated increase by less than 10% which would result in a change in noise levels of less than 1dB(A). The noise survey findings conclude that the increase in noise levels would not be perceptible under normal listening conditions and would result in a negligible adverse noise impact. The details of the noise survey calculations are set out in Appendix 11.1 of the ES.

6.180 Site Contamination (ES section 13)

6.181 The detailed site contamination risk assessment indicates a single potential risk to health (asbestos) and further investigation, site remediation/mitigation prior to construction would be required. It is noted that there was no significant risk to controlled waters identified and

there are not considered to be any cumulative effects upon any receptors arising from both off-site development and the proposed development.

6.182 Renewable Energy and Sustainability

6.183 Paragraphs 148 and 150 of the NPPF require the planning system to ‘...*support renewable and low carbon energy and associated infrastructure*’. New development should ‘*avoid increased vulnerability to the range of impacts arising from climate change*’ and in areas which are vulnerable risks should be managed ‘*through suitable adaptation measures, including through the planning of green infrastructure*’. Similarly, greenhouse gas emissions can be reduced through the location, design and orientation of new development.

6.184 Policy SD3 of the JCS sets out the requirements for achieving sustainable design and construction. Development proposals should aim to increase energy efficiency, minimise waste and avoid environmental pollution and in doing so will be expected to achieve national standards and be adaptable to climate change in relation to design, layout, siting, orientation and associated external spaces. An Energy Statement must be submitted for all major planning applications which should indicate the methods used to calculate predicted annual energy demand and associated carbon emissions.

6.185 In accordance with NPPF guidance and SD3, the applicant has provided a Renewable Energy and Sustainability statement, which acknowledges the above policy approach set out at local and national level in terms of the design and construction methodology of new builds needing to achieve inherent adaptation specification and energy efficiency. In so doing, the applicant acknowledges and has considered the various requirements and considerations of Policy SD3 which include achieving standards of construction above the minimum standards set by building regulations, optimising building fabric, construction techniques, natural lighting and solar gain, measures to reduce the impact of climate change, including flood mitigation, heat proofing, open space provision, shading, water retention and landscaping.

6.186 The application is an outline proposal and therefore the applicant points out that annual emission rates cannot be estimated fully. However, the applicant confirms that the design strategy would follow the methodology for calculating the predicted annual energy demand and associated carbon emissions as required by current building regulations (Part L). The illustrative master plan indicates areas of open space, landscaping and water retention. At a later stage in the planning application process, the Council would consider the extent to which all criteria and standards set out above have been incorporated into the layout, design, fabric and construction methodologies of the proposed development.

7. CONCLUSION AND RECOMMENDATION/PLANNING BALANCE

7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. This is reiterated in paragraph 47 of the National Planning Policy Framework (NPPF) which also highlights that decisions on applications should be made as quickly as possible.

7.2 NPPF paragraph 11 sets out a ‘*presumption in favour of sustainable development*’ which in decision making means ‘*approving development proposals that accord with an up-to-date development plan*’. This is referred to as the ‘tilted balance’ and the government’s approach to ensuring delivery of housing nationally.

- 7.3** The application site lies outside of the Principal Urban Area of Cheltenham (PUA). Policy SD10 of the JCS states that in Cheltenham on sites that are not allocated, housing development will be permitted on previously-developed land within the Principal Urban Area. Housing development on other sites will only be permitted where it is infilling within the PUA or affordable housing on a rural exception site or there are other specific exceptions/circumstances defined in district or neighbourhood plans. The proposed development therefore conflicts with SD10.
- 7.4** Cheltenham Borough Council is currently unable to demonstrate a five-year supply of housing land. As such, by virtue of paragraph 11(d) footnote 7, the policies of the development plan that are most important to determining the application are out-of-date and the paragraph 11d) and the 'tilted balance' exercise is engaged. The shortfall position in housing land supply and the contribution of 250 houses in alleviating that shortfall is a material consideration.
- 7.5** However, the application site lies wholly within the Cotswold AONB and the grade II listed structures of Hewlett's Reservoir are located immediately adjacent to the east site boundary. The site's designated status and adjacent listed structures means that NPPF paragraph 11d) (i) and (ii) apply; *planning permission should be granted unless policies in the NPPF that protect areas or assets of particular importance provide a clear reason for refusing the development proposed ... or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies of the Framework.*
- 7.6** Whilst it is acknowledged that the proposal would have the effect of increasing the supply of housing land in Cheltenham, government guidance indicates clearly that this needs to be weighed against other considerations/adverse effects which in this case relate principally to the impacts of the proposed development on the AONB, heritage assets and the highway network.
- 7.7** Paragraph 172 of the NPPF emphasises the great weight that should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The scale and development within an AONB should be limited and planning permission refused for major development other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest.
- 7.8** The proposed development is considered to be major development within the AONB. The 'exceptional circumstances' put forward by the applicant are the provision of housing (including affordable housing) and its contribution to the Council's housing land supply and local housing needs. From the applicant's perspective, the need for the development in terms of any national considerations and impact on the local economy, appear to be justified on this basis.
- 7.9** Officers consider that there are no 'exceptional circumstances' associated with this case and the thresholds and tests of paragraph 172 are not met. Housing provision and the contribution of 250 dwellings towards meeting housing land supply requirements is significant but cannot on its own be an exceptional circumstance. The shortfall in housing land supply could be addressed via the development of other sites within the JCS area, including allocated sites for housing. Furthermore, NPPG guidance states that AONBs *'are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas'*. Fundamentally, a shortfall in housing land supply does not mean that there should be a presumption in favour of granting planning permission for residential development within the AONB.

- 7.10** Any adverse impact on the AONB as a result of the proposal, which cannot be adequately mitigated, should weigh greatly in the proposal's assessment. Officers consider the visual and landscape impacts of the proposed development on the AONB as a whole to be significant (Moderate/Major, Adverse and Permanent). Proposed mitigation, which largely comprises of the retention of a section of the southern pasture slopes, retention of TPO'd trees and some hedgerow and a proposed tree belt, is not considered sufficient to mitigate the identified harmful visual and landscape effects of the proposed development; the proposed mitigation measures considered to alter the character of the site as a whole and result in harm to the AONB in themselves.
- 7.11** It is also considered that the impacts of the proposal on the setting of the heritage assets within Hewlett's Reservoir would be unacceptable in heritage terms. The proposed development would neither sustain nor enhance the designated heritage assets and are therefore contrary to Section 66(1) of the Planning (Listed Building and Conservation Area) Act 1990, section 16 of the National Planning Policy Framework and Policy SD8 of the Joint Core Strategy.
- 7.12** There have also been significant concerns raised by the Highway Authority regarding the proposed access arrangements and impacts on the highway network. The application details have also not addressed the cumulative impact of development and future traffic growth for an appropriate future year. The impacts of the proposed development on the highway network, and in particular nearby road junction capacities, are considered to be severe and fail to provide a safe and suitable access for all users. The proposals conflict therefore with paragraphs 108, 109 and 110 of the NPPF, policies INF1 and INF4 of the JCS, LTP PD 0.3 and 0.4 of the Local Transport Plan and Manual for Gloucestershire Streets.
- 7.13** Any public benefits arising from the proposed development are also a material consideration and have been considered as follows:-
- A contribution to the supply of housing (250 units) including affordable housing provision– which would contribute to the Council's current shortfall in housing land supply and local housing needs
 - The economic benefits of employment gain within the construction and utilities industries – albeit only moderate weight can be afforded given the temporary nature of the construction phase of the development.
 - New footpath links and new publicly accessible land
- 7.14** Whilst it is also acknowledged that there is potential for a net biodiversity gain arising from the proposed development, this needs to be weighed against the overall harmful effects of the landscape mitigation proposals on the character of this site.
- 7.15** There are no other material considerations and/or public benefits that would weigh in favour and/or outweigh the adverse effects of the proposed development.
- 7.16** Having regard to paragraph 11(d)(i) of the NPPF and having applied the policies in the NPPF that protect areas or assets of particular importance, there is a clear reason for refusing the development. The 'tilted balance' is not therefore engaged. In this case, and for the purposes of paragraph 11d, it is also not necessary to consider whether any other adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits. However, even if paragraph 11(d)(i) was considered not to apply in this instance, it has been demonstrated that the adverse impacts of granting planning permission would significantly outweigh the benefits, in accordance with paragraph 11(d)(ii).

- 7.17 For the reasons set out above, the officer recommendation to the Committee is that the Secretary of State be advised that the Council would be minded to refuse the appeal proposal for the following reasons.

8. REFUSAL REASONS

- 1 The application proposes the erection of 250 houses on greenfield/agricultural land within the Cotswold Area of Outstanding Natural Beauty (AONB) and on land outside of the Principal Urban Area of Cheltenham (PUA).

Policy SD10 of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011-2031 (December 2017) stipulates that on sites that are not allocated for residential development, new housing development within the Cheltenham Borough administrative area will normally only be permitted on previously developed land within the PUA except where otherwise restricted by policies within District Plans. The proposed development does not satisfy any of the exception criteria of SD10 that would support housing development on this site.

The proposed development conflicts therefore with Policies SP2 and SD10 of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011-2031 (December 2017) in that the proposed development does not meet the strategy for the distribution of new development within Cheltenham Borough and the application site is not an appropriate location for new residential development.

- 2 The proposals constitute major development within the Cotswold Area of Outstanding Natural Beauty (AONB). In accordance with national planning policy, the AONB is afforded the highest status of protection in relation to conserving and enhancing landscape and scenic beauty and in which major development is prohibited unless in exceptional circumstances and when in the public interest.

The proposed construction of 250 houses would, by virtue of the location and size of the application site, the scale and extent of development and the numbers of dwellings proposed plus associated infrastructure would fail to conserve or enhance the landscape and scenic beauty of the AONB and would result in significant harm to and permanent loss of the landscape quality and beauty of this part of the AONB. The proposed indicative mitigation measures intended to minimise harm to the AONB are considered inadequate, do not address the concerns and would alter the character of the site as a whole and result in harm to the AONB in themselves.

The applicant has failed to demonstrate any exceptional circumstances (or public interest) that would justify the proposed development within the AONB and thereby outweigh the identified harm to the AONB.

The proposed development is therefore contrary to Policies L1 and D1 of the Cheltenham Plan (2020), Policies SD4, SD6 and SD7 of the Joint Core Strategy (2017), Policies CE1, CE3, CE10 and CE12 of the Cotswold AONB Management Plan 2018-23 and paragraphs 170 and 172 of the NPPF.

- 3 The proposed development would, by virtue of design, layout and traffic generation result in a severe impact on the highway network and would fail to provide a safe and suitable access for all users, contrary to paragraphs 108, 109 and 110 of the National Planning Policy Framework, Policies INF1 and INF6 of the Joint Core Strategy (adopted December 2017), Policies LTP PD 0.3 and 0.4 of the Local Transport Plan (adopted March 2021), Policy CE10 of the Cotswold AONB Management Plan 2018-23 and Manual for Gloucestershire Streets (adopted July 2020).

- 4 The application site lies adjacent to designated heritage assets (grade II listed Hewlett's Reservoir and Pavilion). The proposals would have an unacceptable harmful impact on the setting of the heritage assets within Hewlett's Reservoir. As such, the proposed works are considered not to sustain or enhance the designated heritage assets and would cause harm to the significance of the affected designated heritage assets. In weighing this harm against the public benefits of the proposal, through the provision of housing, the public benefits of the proposals are not considered to outweigh the harm caused to the significance of the affected heritage assets. The proposed development is therefore contrary to Section 66(1) of the Planning (Listed Building and Conservation Area) Act 1990, Policy SD8 of the Joint Core Strategy 2017, Policy CE6 of the Cotswold AONB Management Plan 2018-23 and Chapter 16 of the National Planning Policy Framework.
- 5 Policies INF4, INF6 and INF7 of the Joint Core Strategy (JCS) (adopted 2017) (and Policy CI1 and CI2 of the Cheltenham Plan) state that where infrastructure requirements are generated as a result of site proposals, new development will be served by appropriate on and/or off site infrastructure (including maintenance requirements) and community services. Financial contributions towards the provision of necessary infrastructure and services will be sought through the s106 or CIL mechanisms, as appropriate.

Policy SD12 of the JCS seeks the provision of 40% affordable housing in developments of 11 or more dwellings within the Cheltenham Borough administrative area. Affordable housing requirements will be delivered by way of on and/or off site provision and secured through the s106 mechanism.

The proposed development will lead to:

1. An increase in demand for playspace provision in the Borough and therefore the development should mitigate its impact in terms of adequate provision for on and/or offsite outdoor playing space. (Supplementary Planning Guidance - Playspace in Residential Development, Policy INF4, INF6 of the JCS, Policy CI1 and CI2 of the Cheltenham Plan and Section 8 of the NPPF)
2. Management and maintenance of hard and soft landscaped areas and any private streets
3. A need to provide for an element of affordable housing (Policy SD12 of the JCS and Policy CI1 of the Cheltenham Plan) which would be expected to be provided in full on site.

No agreement has been completed to secure the delivery of affordable housing requirements, and schemes/strategies for play space provision and site management and maintenance. The proposal therefore does not adequately provide for affordable housing requirements, schemes/strategies for play space provision and site management maintenance and conflicts with Policies SD11, SD12, INF3, INF4, INF6 and INF7 of the JCS, Policies CI1 and CI2 of the Cheltenham Plan (adopted 2020), Supplementary Planning Guidance – Playspace in Residential Development and the NPPF as referred to above.

- 6 Policy INF4, INF6 and INF7 of the Joint Core Strategy (JCS) (adopted 2017) (and Policy CI1 of the Cheltenham Plan) states that where infrastructure requirements are generated as a result of site proposals, new development will be served by appropriate on and/or off site infrastructure and community services. Financial contributions towards the provision of necessary infrastructure and services will be sought through the s106 or CIL mechanisms, as appropriate. The proposed development will lead to a need to provide for education and libraries provision for the future residents (Policy INF6 of the JCS).

There is no agreement from the applicant to pay the requested financial contributions towards education (school places) and libraries provision that would be generated by the proposed development to make the application acceptable in planning terms. The proposal therefore does not adequately provide for education and library provision and conflicts with Policy INF4, INF6 and INF7 of the JCS (adopted 2017), Policy C11 of the Cheltenham Plan (adopted 2020) and guidance on developer contributions set out in the NPPF, CIL Regulations (as amended) and DfE Guidance on Securing Developer Contributions for Education.

- 7 Policies INF4, INF6 and INF7 of the Joint Core Strategy (JCS) (adopted 2017) (and Policy C11 of the Cheltenham Plan) state that where infrastructure and services requirements are generated as a result of site proposals, new development will be served by appropriate on and/or off site infrastructure, services and other remedial measures. Financial contributions towards the provision of necessary infrastructure, services and other remedial measures will be sought through the s106, s278 or CIL mechanisms, as appropriate. The proposed development would lead to a requirement for necessary off-site highway improvement works (JCS Policies INF1 and INF6) and the implementation of the Residential Travel Plan.

No agreement has been completed to secure the provision of necessary highway improvements works and the funding and implementation of the Residential Travel Plan. The proposal fails therefore to meet the expectations of Policy INF1 and INF6 of the JCS (adopted 2017), Policy C11 of the Cheltenham Plan (adopted 2020) and guidance on developer contributions set out in the NPPF.

APPLICATION NO: 20/01069/OUT	OFFICER: Mrs Lucy White
DATE REGISTERED: 16th July 2020	DATE OF EXPIRY : 5th November 2020
WARD: Battledown	PARISH: CHARLK
APPLICANT:	Robert Hitchins Limited
LOCATION:	Oakley Farm, Priors Road, Cheltenham
PROPOSAL:	Outline application for development comprising of up to 250 residential dwellings including provision of associated infrastructure, ancillary facilities, open space and landscaping, demolition of existing buildings and formation of new vehicular access from Harp Hill. All matters reserved except for means of access to site from Harp Hill.

REPRESENTATIONS

Number of contributors	373
Number of objections	368
Number of representations	2
Number of supporting	1

Bibury
Finchcroft Lane
Cheltenham
GL52 5BD

Comments: 28th July 2020

My wife and I are aware of interest in developing the pasture slopes between Oakley farm and Harp Hill and wish to register our OBJECTION to the possibility of building in this Area of Outstanding Natural Beauty (AONB), especially as its availability does not feature in the Cheltenham Plan. To build here would also be in conflict with the Cotswolds AONB Management Plan and risks the possibility of setting a precedent for further development attempts within the AONB. Furthermore, any development would inevitably have an adverse impact on wildlife in the area, as well as change the character of the fields for the worse.

In recent years this area has been subject to intense building work, particularly on the old GCHQ Oakley site. A predictable consequence as a result of the new estate has been a sharp increase in the amount of traffic in the area, particularly on to Priors road at the north end, and on to Greenway lane and Harp Hill from the south. The latter roads in particular were not designed to cater for large volumes of traffic. Any development on the Oakley farm slopes will inevitably lead to a lot more traffic using roads unsuited and unable to cope with the increased volume.

The Flower House
Stanley Road
Cheltenham
Gloucestershire
GL52 6PD

Comments: 4th August 2020

My wife and I are much distressed at the above proposal.

Since we came to Cheltenham in 1985 we have gradually noticed the deterioration in the natural beauty of the town and surrounding hillsides. If this development proposal succeeds Cheltenham, when viewed from Cleeve Hill and other high ground, will be a blight on this AONB.

Traffic density will be a natural disaster with pollution spilling into our streets which are now overburdened; with Harp Hill and Hewlett Road, Bouncers Lane, Prestbury etc, becoming pollution hot spots with traffic queuing and engines running making Cheltenham an undesirable place to live! The bottom of Harp Hill with three roads meeting at a mini-roundabout at Hewlett Road is already a very difficult intersection to negotiate.

We certainly hope that the Council rejects this unwelcome proposal and that Cheltenham can retain its Regency Town reputation as part of the Cotswold Hills beauty.

Many thanks for considering this matter.

Tanglin
Oakley Road
Cheltenham
Gloucestershire
GL52 6NZ

Comments: 4th August 2020

I am writing to OBJECT to Planning Application 20/01069/OUT for the construction of 250 homes on the fields at Oakley Farm Pastures, which would be accessed via Harp Hill.

This location is a pristine AONB greenfield site and therefore no permission for any building development of any type should be issued for this location. As a borough, a county and a nation, we should be making every possible effort to ensure that our AONB land is preserved for the benefit of the current environment and all future generations. This land has been designated as AONB by the relevant authorities in the past for very sound environmental and ecological reasons and it is incumbent upon today's authorities to continue to honour that decision, for the benefit of all. A short-term profit for developers should never outweigh permanent harm for an entire community.

Furthermore, the Cheltenham Local Plan, just published and adopted by CBC Councillors after many months and years of debate, deliberately excludes this area from future housing development. It would therefore be perverse in the extreme for any planning permission now to be granted.

Please refuse this application and please do so in a manner that makes it unequivocally clear that any re-submitted "revised scheme" for fewer homes will be refused as well. The above arguments for refusal are as equally valid for a 25-home scheme as for a 250-home scheme.

Hallam Oaks
Greenway Lane
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PN

Comments: 4th August 2020
Letter attached.

The Oaks
Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PR

Comments: 4th August 2020
Letter attached.

80b Cheltenham Road
Longlevens
Gloucester
GL2 0LX

Comments: 28th July 2020
I strongly object to this. We regularly use this space to walk our dog. This will also have a massive impact on traffic when leaving for work.

Fremington
Ashley Road
Cheltenham
Gloucestershire
GL52 6NS

Comments: 28th July 2020
I would like to object to this proposal as it is an unnecessary development that does not fit within the recently agreed Local Plan. It would result in significant harm to the key principles of the AONB. The permanent, irreversible loss of this important green space and encroachment of properties into the AONB and wider countryside is unacceptable. Replacing such a large proportion of the current sloping fields with hard surfaces is bound to cause surface water drainage issues.

Access to the development via Harp Hill would not only cause significant local traffic problems but is also potentially dangerous. The local infrastructure which is already struggling would not be able to cope with a development of this scale.

135 Hales Road
Cheltenham
Gloucestershire
GL52 6ST

Comments: 29th July 2020

this is an inappropriate development in an AONB

Glenthorpe
Battledown Approach
Cheltenham
Gloucestershire
GL52 6QZ

Comments: 31st July 2020

I object to this development on the basis that Ham Hill road simply cannot cope with the existing traffic let alone the additional traffic from this development. Likewise I believe the mini roundabout at Priors Road, Priors Road itself and Hales road could not cope.

Ham Hill also also a renowned cycle route as evidenced in lockdown and this will make it a serious/fatal accident waiting to happen.

Castle Farm
Ashley Rd
Cheltenham
GL52 6NU

Comments: 2nd August 2020

I object to any development on this site on the following grounds :

- AONB ... as an AONB this should not be built on. There are new planning regulations being proposed by the government which would effectively ban all development on areas of AONB. An AONB has been designated that for good reason.

- TRAFFIC ... Harp Hill is already a congested area, and the massive increase of traffic would have serious knock on effects, especially along the narrow Greenway Lane. The gridlock at the single lane 6 ways traffic lights would be dreadful as vehicles would choose this route to access the A40 in/out of Cheltenham.

56 Beeches Road
Charlton Kings
Cheltenham
Gloucestershire
GL53 8NQ

Comments: 3rd August 2020

This is my objection letter for the 250 houses planned on Harp Hill. Aswell as the area being an AONB, there are no plans for extra infrastructure and traffic is already an issue

at peak times as I drive down harp hill every day for work. Please will the council look at empty buildings before ruining our countryside.

I'm a resident of Charlton kings.

Rose Orchard
Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PR

Comments: 3rd August 2020

The application must be rejected in total.

Just some the main reasons are:

This land is ANOB and must be protected for future generations to enjoy.

As a Battledown resident for 21 years. I have seen the traffic volumes using Harp Hill progressively increasing. The road is narrow in places there are no footpaths,.

Walking in the roadway is the only option. The road is in a dreadful condition, with broken surfaces, misaligned kerbs deep potholes.

Consequently people who are cycling, walking dogs, those with children in pushchairs and wheelchairs have to pick their way around parked cars and potholes. They are always exposed to danger with each vehicle that passes.

The Increasing traffic volumes from this proposed development will only make matters worse.

2 Brockweir Road
Cheltenham
Gloucestershire
GL52 5FW

Comments: 3rd August 2020

I am writing to strongly object to the outline planning application 20/01069/OUT. No development on designated Areas of Outstanding Natural Beauty (AONB) should be allowed. I request that Cheltenham Borough Council refuses permission for the following reasons:

1. AONB (Area of outstanding natural beauty)

This land is AONB and its destruction would irrevocably change the local area. The Cotswolds AONB Management Plan 2018-2023 policies for the management of AONB land has two primary key purposes

a. To conserve and enhance the natural beauty of the Cotswolds AONB

b. To increase the understanding and enjoyment of the special qualities of the Cotswolds AONB. It is an area that has such obvious and impressive natural beauty that clearly needs protecting and will essentially 'close off' an already heavily build-up area.

This is afforded the highest level of protection in planning policy terms and the National Planning Policy Framework (NPPF) states that "Great weight should be given to conserving and enhancing the landscape and scenic beauty in National Parks, the Broads, and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues." This development does not adhere to these key purposes and is therefore contrary to the AONB Management Plan.

2. Cheltenham Plan for housing

According to Table 1 on p47 of the Cheltenham Plan, the supply of houses for the period 2011 - 2031 already exceeds the objectively assessed need. As such this development has no right to claim to be of exceptional need (that which is necessary to destroy ANOB land) and therefore it cannot be acceptable to destroy ANOB to acquiesce to the demands of the developers.

3. Impact on Highways, Access and Transport

The current volume of traffic that uses Harp Hill has increased year on year since the development of the surrounding estates. It is already a terrible road that was never designed for heavy traffic and in quite a state of disrepair. Any further development will increase the risk of a significant accident. The bottom of Harp Hill exits onto a small double mini roundabout which does not cope with the current volume of traffic and cannot be further developed to make it any safer for the addition of a large estate and its accompanying traffic.

When Oakley Grange developers applied for access to the homes to be built in 2013, they were only allowed 40 houses off Harp Hill, due to the unsuitability of the road. The remaining 270 homes must use the narrow unsuitable roads of Battledown Park to gain access to the council road network.

It should be noted at this point that no attempt should be made to access this development through Battledown Park either. This estate is currently flooded with vehicles lacking parking and wholly unsuitable access roads that would increase the likelihood of a serious accident most likely involving children.

4. Impact on Landscape Character, Visual Amenity

Roe Deer, Muntjack Deer, Foxes, Badgers, Toads, Lizards, Field Mice and many more frequent the ANOB which makes it a most pleasurable place and a very calming influence on the local area. If this land is developed this wildlife will be lost to this forever no matter what assurances the developers give. The destruction of this country's unique green and pleasant lands is unforgivable. To add to this for some unknown reason all the buffer green space is located at the top of the proposal. Logically any green space buffer should be between two large developments and should therefore be at the bottom of the proposal.

The environmental impact of any extra housing on this ANOB site must be taken into account as this will have a large detrimental impact on the quality of life for existing residents who not only live directly opposite the proposed development but in the surrounding area. These are, but not exclusively, loss of ANOB land, Loss of privacy, increased pollution, drainage issues, flooding and possible landslides.

5. Local Amenities:
- a. Bus routes. No supporting routes at all either proposed or existing.
 - b. Overcrowded schooling. local schooling is oversubscribed as others have described. Further development will only exacerbate the situation until it is completely untenable, given that this proposal is outside the development plan not extra school will have been provision for.
 - c. Medical infrastructure. The local infrastructure will most likely not be able to cope with yet more people to safely cover. I see no reason why any addition would be beneficial to the current populous.
 - d. Emergency services. I suspect that the additional houses have not been factored into the emergency services funding and personnel numbers. This will, therefore, overstretch them and put lives at risk, Is an unplanned housing estate worth that risk?
 - e. Refuse collection. Currently where I live it is a regular occurrence that the bins do not get collected as the workers run out of time due to routes being too large. The addition of yet more houses makes it significantly worse as the local council becomes overstretched with this unplanned addition to the housing plan.

For the reasons set out above, with the greatest respect, I urge the council to refuse the plans for development on this ANOB site.

46 Cirencester Road
Charlton Kings
Cheltenham
Gloucestershire
GL53 8DA

Comments: 3rd August 2020

I am writing to object to the planned development on Oakley fields. As you know this is an Area of Outstanding Beauty and the habitat of many of our native animals, trees and plants. Far too much of Cheltenham's green fields have been taken over the years and it's time that these developers left Cheltenham alone. Bishop's Cleeve, Leckhampton and Charlton Kings are all at full capacity and are already over whelmed by traffic. I have lived here since 1980 and have seen a lot of change for the worse. I hope that the group objecting to this development are successful in blocking it,

Comments: 27th September 2020

Cheltenham is at full capacity. The new houses being built will take away the habitat of more wildlife and plants.

It will increase the traffic and pollution in Charlton Kings which has become over populated. Some of the people supporting these projects in Cheltenham don't even live in the town or even the county. Many of the people who buy these proposed houses won't work in Cheltenham but will add to the heavy commuting traffic.

Property developers who don't live in the county are destroying the environment for financial gain, building houses in inappropriate areas of outstanding natural beauty. Surely there are some brown sites available or empty town offices.

Thank You.

Comments: 22nd January 2021

This is an Area of Outstanding Natural Beauty which should not be interfered with. The wildlife depends upon it as habitat.

Cheltenham has already become far too built up with huge areas being taken by developers with no interest in the town other than to make money.

More people in the area leads to more traffic, more congestion and more air and noise pollution.

3A Wessex Drive
Cheltenham
Gloucestershire
GL52 5AF

Comments: 3rd August 2020

I live at 3a Wessex Drive, Cheltenham, GL525AF and wish to formally object to the above planning application on the following grounds:-

1/ There has already been significant development in this area and the roads are already struggling to cope with increased level of traffic, frankly in the morning its becoming very unsafe. The Harp hill road is particularly dangerous with cars travelling very fast and at peak times significant road congestion, the roads are currently in very poor condition thus more cars will increase this problem. It is also a major issue currently at the six ways junction more houses will simply increase this issue.

2/ Flooding is already an issue with the drainage system's in the area struggling to cope, again further housing will increase this issue.

3/ This area has already had significant development which can already be seen as a damaging blot on the beautiful Cotswold Escarpment, losing valuable pasture's that is used by wildlife in the area.

21 Cudnall Street
Charlton Kings
Cheltenham
Gloucestershire
GL53 8HS

Comments: 3rd August 2020

We object strongly to the above proposal for the following reasons:

It is a designated area of outstanding natural beauty for obvious reasons, giving much pleasure to walkers from local built up areas

- walkers would no longer be able to enjoy unparalleled views across the countryside.
It is our countryside to be enjoyed by all, not just a privileged few
- wildlife would re-locate or be lost
- this would create a dangerous precedent for further housing developments in this area

- traffic generated would degrade a busy road and make it difficult for pedestrians as there is pavement on one side only
- building work would create traffic jams and potentially block this shortcut to the A40
- this is one of the few areas of natural beauty in a more and more built up area. It would destroy the soul of this area.

There must be other sites which would be more appropriate. Maybe it is time the council looked at all the empty shops in town and granted change of use for housing.

This would make our town come alive again!!

8 Wistley Road
Charlton Kings
Cheltenham
Gloucestershire
GL53 8NW

Comments: 3rd August 2020

Please find attached my strong objections to the above Planning Application 20/01069/OUT for 250 additional dwellings locally (see below). This plan needs to be stopped before it goes any further and destroys a beautiful piece of our countryside. We cannot allow builders to remove AONBs just for personal profit - and especially not in areas where the development would cause detriment and chaos locally.

Please add this attachment to the complaints already made by many, and put all of our objections where they can clearly be heard and seen. This application needs to be stopped!

OAKLEY FARM - APPLICATION NUMBER 20/01069/OUT

1. This land is part of an area of natural beauty (AONB) and as such is supposed to be protected and left for the benefit of all generations both now and in the future. Building houses on this land is not a purpose that meets with this specification; indeed, it is a purpose that will destroy the beauty of the countryside and influence all adjoining areas in a detrimental way. It is important to protect our heritage and keep Cheltenham the desirable town it has always been - please don't turn it into a congested endless building site.

2. I worked at GCHQ for 17 years and during my time at Oakley I saw first-hand the flooding that occurred most years on Priors Road and the surrounding low-lying area. Water would run down the hill towards Priors Road and gather on the road below, filling drains and overflowing often into private homes. If this area is built upon, it will reduce the natural soak areas that these fields provide currently and the water will flow in other directions enlarging the areas that are at risk of flooding and putting many large areas of housing at the bottom of the hill at an even greater risk of flooding. Water will always find it's way around obstacles and across impenetrable ground - and in large quantities, will cause untold damage and distress.

3. Currently, with the increased number of luxury homes that have been built on Harp Hill over the past few years, the traffic has significantly increased in Greenway Lane and

Harp Hill. In the past, many people have used this route as a detour to avoid several sets of traffic lights on the A40 and traffic build-up along Hales Road - so it became what is locally known as a 'rat run'. Even when St Edwards school is closed or classes are in process, these roads are busy - and this can be evidenced by the frequent requirement for resurfacing on a regular basis. This situation becomes even worse when the Charlton Kings Cricket Club is playing. The road along their boundary becomes a dangerous bottleneck with children, adults and dogs at risk of being run over as motorists try to find their way safely through what becomes a one-way road due to parking along one side of the road and sometimes on both sides near the traffic calmers. Traffic calmers - there is already a clue there somewhere!

Greenway Lane joins the A40 at Six Ways and the build-up of traffic queuing in the lane can tail back almost up to the Crickey Club during term time, but even out of term-time it can be difficult getting through the lights (when they turn green) due to parked vehicles near to the junction preventing access around them when traffic is coming the other way. Add to this pedestrians and cyclists weaving their way between traffic, the situation becomes very dangerous.

If as suggested, many additional homes are built on the proposed site, traffic quantity on Greenway Lane and Harp Hill could increase more than 100-fold and congestion would be so great that the roads would become impossible to use safely! Tempers would become frayed as delays increased out of all proportion and the area would turn into a local version of Piccadilly Circus in the rush hour! Not an area likely to add value to the homes already there either.

All the additional drivers this plan would bring, who would presumably be wanting to get to their places of work (school, shopping etc) would all need to either get onto the A40 from Greenway Lane (as above) or enter the mini roundabout at the bottom of Harp Hill - already a tricky exit because traffic enters the roundabout from Priors road in what is virtually a blind spot for drivers entering from Harp Hill. I regularly need to wait for several minutes in order to get a safe opening in traffic onto the mini roundabout there - even when the traffic is quieter on Priors Road. If traffic from the new development tried to go in the other direction through Ham, Ryeworth Road or the Glenfall Estate - these areas would also become congested very quickly - and would put the children in Glenfall School at risk. There simply isn't the capacity for this amount of traffic in these areas and Six Ways is already a busy junction - the additional delays would be impossible to justify. Roads would need to be resurfaced even more frequently (more expense for the Council), parking would need to be 'policed', accidents will inevitably happen and this area will become a black spot !

4. At the moment the air quality on Harp Hill continues to be reasonably good and it is a pleasure to walk through the fields along public footpaths. I often see deer, rabbits, badgers and a good selection of birds during my walks - these would be driven out by an insurgence of so huge a number of new people/cars/lorries etc. This proposed site would destroy the landscape, the fauna and flora, the peaceful/restful environment and the air quality and turn the hill into a chaotic and disorganised - thoroughly undesirable neighbourhood.

PLEASE PUT THE QUALITY OF PEOPLES LIVES BEFORE THE SIZE OF BUILDERS AND POLITICIANS POCKETS!

64 Brooklyn Road
Cheltenham
Gloucestershire
GL51 8DU

Comments: 3rd August 2020

I am writing to express my objection to this development, which will degrade and disfigure this part of Cheltenham.

I have been a resident of this town for 40 years and know it pretty well. But I also know we are, accelerated by Covid, going through a period of profound change that will have a huge impact on our town centres.

If 250 additional dwellings are needed, and of course the UK population is growing over the next few years, surely we need to look at brown field sites and soon to be difficult to fill commercial sites.

The Cotswolds edge over Cheltenham is of great value to local residents and visitors alike. Disrupting its flora and fauna will be irreversible.

67 Wessex Drive
Cheltenham
Gloucestershire
GL52 5AF

Comments: 3rd August 2020

I most strongly object to any consideration being given to this application as it is a 'protected area of natural beauty' within the bounds of Cheltenham Borough Council.

To permit development would increase the already congested roads, where there is more space on the west side of the town. That side has all the infrastructure to support any amount of development. Being in close proximity to the M5 motorway will ease traffic throughout cheltenham.

Please register my objection and notify me if there are further discussions

46 Greenway Lane
Charlton Kings
Cheltenham
Gloucestershire
GL52 6LD

Comments: 9th August 2020

The area lies within the AONB and various attempts to have it marked as for development in the Cheltenham Plan have already been rejected. Housing on these slopes would significantly detract from the views up to the scarp from the Priors Road area and across to Battledown from Prestbury. Access to Harp Hill would substantially increase traffic volumes both downhill and along Greenway Lane, with the former

especially prone to breaking up not least because of excess water run-off. A very small number of houses at the bottom of the site might have less impact if access were possible directly on to Priors Road or conceivably via the housing area above Sainsburys.

Rosegarth
54 Carlton Street
Cheltenham
Gloucestershire
GL52 6AQ

Comments: 11th January 2021

It is amazing that this application is being sought in an AONB with an expectation that it will be approved. It will be a blight on the landscape and if approved regretted for ever. It is not in my back yard but walking past on a regular basis, it is difficult to conceive the whole project as being anything more than commercial property speculation. We have a large empty commercial property (BT Garage) in Carlton Street nearby since at least 2006. Time would be better spent forcing the commercial owners to develop this, and similar brown sites in Cheltenham, of which there is no lack.

3 Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6QB

Comments: 5th August 2020

I am writing to lodge my objection against the proposed development of building up to 250 residential dwellings at Oakley Farm, Priors Road with site access from Harp Hill, reference 20/01069/OUT. I firstly object to the development due to the fact that it has been proposed on green belt land which has also been designated as an AONB. There are several brownfield sites much more suited for this sort of development and to deprive the locality of such a beautiful slice of nature would be a great loss, for both humans and wildlife. Also, the access to this development has been proposed via Harp Hill which is already struggling to cope with the additional vehicular load placed on it by the Oakley Grange development. Living at the bottom of Harp Hill I witness on a daily basis multiple near misses between cars leaving Harp Hill and cars driving along Priors Road as well as for cars turning onto Harp Hill from Hales Road / Hewlett Road. Adding a further 250-500 cars to this junction, a large proportion of which will depart/return during rush hour will increase the chances of a serious collision, as well as making crossing Harp Hill, or any of the other surrounding roads, on foot extremely dangerous.

11 Ashley Close
Charlton Kings
Cheltenham
Gloucestershire
GL52 6LF

Comments: 5th August 2020

Page 163

I live at No. 11 Ashley Close, off Greenway Lane and I have received details of the Planning Application to build 250 homes on the Oakley Farm Pastures. I was shocked to hear this and wish to object for the following reasons.

The Access onto Greenway Lane and Harp Hill just could not take that amount of traffic. Greenway lane is a narrow road and the Congestion at the lower end where it meets the London road would be impossible. There is always a build up of traffic at the London Road traffic lights at busy times of the day. A lot of traffic as it comes up and down Greenway lane and Harp Hill.

There will be so much increased traffic because parents will be taking their children to school and others going to work at peak times. The fumes from the cars will be very bad for the environment.

I have lived in this area Greenway lane and Harp Hill for the majority of my life and I think as this is an AONB with the Beautiful Views, Wildlife and Ancient Trees. It should be preserved for the generations to come.

These are my reasons for objecting.

Woodlands,
Oakley Rd,
Battledown,
Cheltenham
GL52 6PA

Comments: 5th August 2020

We wish to record our OBJECTION to the application 20/01069/OUT for a large-scale housing development (250 dwellings) which has been submitted to Cheltenham Borough Council to be built on Oakley Farm Pasture Slopes AONB - a part of Cheltenham's precious Area of Outstanding Natural Beauty.

My objection has already been made in emails from me to you and are also made by the various groups such as Friends of Oakley Farm Pasture Slopes.

I would also add that given the current pandemic it seems likely that a large amount of industrial and commercial property will be released for private domestic housing in the coming years which will more than satisfy the country requirements for additional accommodation.

We MUST NOT consider destroying our precious areas of Outstanding Natural Beauty until we have exhausted all build opportunities on the great many brown field and commercial sites we have available in the county.

Falcons Crest
Stanley Road
Cheltenham
Gloucestershire
GL52 6QD

Comments: 5th August 2020

I wish to object to the above planning application.

I have never objected to any planning proposal in the past but feel quite strongly about the impact of additional housing in this area.

My main worry, is that the proposal is for 250 houses equates to approximately 500 extra cars using Harp Hill and a huge amount of construction traffic. Harp Hill is narrow, with many walkers, runners and cyclists. It also has many parked cars and has already had to cope with the additional traffic from the new housing estates on Birdlip Road. There is nowhere for this extra traffic to go as Greenway Lane is also a very narrow country lane. The congestion and extra vehicles on this road will be unsafe with the potential for accidents

Also the road is always crumbling and in bad repair due the problems with water and the elements on such an incline, and this will be made worse by work traffic and extra cars.

Speaking as a GP, the other issue is that when these developments are built , there is no thought about 1000 new patients joining a local GP surgery or 500 extra pupils at the local school. The local schools are small and there are difficulties with staffing of general practice in the area which needs to be considered in this area.

I therefore strongly oppose to building in this area.

15 Eldon Road
Cheltenham
Gloucestershire
GL52 6TX

Comments: 17th January 2021

This is an AONB and will be destroyed by building on the open fields which give this area on the outskirts of Cheltenham its gateway to the beautiful Cotswold Hills.

The traffic on Harp Hill is already much increased and will be further increased if 250 dwellings are permitted. Most houses will have a minimum of 2 cars and this volume entering the already overcrowded road will be dangerous.

I walk up this hill frequently to access the Cotswold Way and it is difficult where there is no footpath and the road surface is constantly deteriorating

19 Jersey Avenue
Cheltenham
Gloucestershire
GL52 2SZ

Comments: 17th January 2021

As a resident of the neighbouring community, I am objecting to the development on the grounds of insufficient infrastructure servicing the proposed development. Access roads to and from the proposed development have already reached capacity and are

overloaded at peak times, surrounding schools are at capacity and the sizes of the roads, in particular Harphill Road, can not be widened to make it safe for pedestrians to walk alongside increased traffic.

Baedala's Tun
Ashley Road
Cheltenham
GL52 6PJ

Comments: 14th August 2020

I am deeply connected to the beautiful countryside to which I came at five years old and where my children were also raised. Along with many friends and neighbours I am passionate about maintaining the integrity of this lovely countryside which is part of the AONB. I strongly object to this application and concur with all of the well-documented comments which are online. In particular the objection made by the residents of Haytor is extremely well documented and researched and is in my mind entirely compelling.

- The site is outside of the PUA - it is within the AONB and is therefore not part of the Town Plan. To build here would contravene very robust national and local policies.
- Cheltenham has precious little AONB on its fringes - that which we do have we should value and protect.
- The proposals would lead to both adverse landscape and visual change in the local area. This is in conflict with JCS Policy SD7 as it neither 'conserves' or 'enhances' the natural beauty of this nationally designated area and it is also at odds with the objectives of the Cotswold AONB Management Plan.
- Views in and out of the AONB should be protected.
- I believe that to build here would only exacerbate what seems to already be quite a serious flooding problem for the houses and roads below after heavy rain.
- The junctions at the bottom of Harp Hill and at Sixways in Greenway Lane are already extreme bottlenecks at certain times of the day. Greenway Lane and Harp Hill are after all just country lanes which have had to absorb ever increasing amounts of traffic - they are already being used as a rat run by many - and it's impossible to imagine that an increase of another 500 plus cars which might go back and forth several times a day could even be considered a viable option. Not to mention all the delivery and service vehicles - as well as emergency vehicles such as fire and ambulance. It would be a huge misjudgement to imagine that this development wouldn't make many people's lives a misery and turn what is still a gorgeous rural area into a nightmare whenever we set out from our homes either on foot or by car.
- Cheltenham was recently voted the best place to live in the south west and it is crucial that the right approach is made in planning and preserving the very best of it. The pandemic and consequent lockdown have underlined what has become most important to many of us - hordes of runners, cyclists, horse-riders, families and children with dogs in tow have taken to these roads - and the PROWs - like never before. There are very few roads which lead up to the very popular beauty spot of Cleeve Hill and this is one of them, and Greenway Lane another.

- With so many shops closing down due to the economic fallout from the pandemic Cheltenham's lure as a thriving shopping centre will in the future become less and less important, whereas the natural beauty of its surroundings and it's designation as 'The Heart of The Cotswolds' will be more relevant than ever.
- Indeed the latest government proposals regarding planning and development make it clear that AONB will be classified as protected and as such will not be made available for development in order to prioritise building on brownfield sites and sites which are on the Town Plan - both less controversial.

There is an abundance of wildlife and all manner of birds and animals coexist here and can often be seen going about their business in broad daylight. It is imperative that we keep the natural wildlife pathways open for them to move around unrestricted and to protect their natural habitat.

The peace and beauty of this rural location is a valuable asset to Cheltenham and I for one fervently believe that we have a huge responsibility to preserve this legacy for future generations and their children to enjoy and we should not let the need for new affordable housing take priority over protecting the countryside.

The Dippers
2 Battledown Mead
Harp Hill
Cheltenham
GL52 6QA

Comments: 14th August 2020

This audacious bid to get a foot in the door of the proposed disastrous idea of building 250 dwellings & all that goes with them, should be seen as just this & rejected at source.

As a Battledown Resident & RSPB Member who has seen over a hundred bird species in the area & on the important N-S Migration Flyway, the thought of losing our birds to yet more bricks & concrete & in the beautiful AONB, makes me very fearful, as we need our green fields, trees & the food chains they hold & their birds & deer & foxes & badgers, not just for their sakes, but for our own Mental & physical good health.

The Oakley Farm fields are the last few pristine sloping pastures left in the area. We can't just forsake it all for more, much more traffic on lovely steep peaceful viewful Harp Hill, & John Denver's "More people, more scars upon the land". Rocky Mountains, Harp Hill, the principle's the same - let's have a victory for Common Sense & reject this devious & sneaky bid, in which just making an Access road alone will scar the land & Lord forbid what it may lead to.

I urge the Planning Committee to think about just what we stand to lose - if we want to be a Tourist Area, we need to look after the lovely Cotswolds & it's vital AONB. No if's, no but's, no foot in the door, just NO to building on Oakley Farm Pastures.

Comments: 18th February 2021

I refer to my letter of Wednesday 17th April, 2019.

Page 167

There has been a lot of development in the Oakley area, to the point where "Enough is enough"! Our Cotswold countryside is being eroded to its detriment & the AONB could be next! More of our Cherished bird & other wildlife habitat is at risk from 250 new houses/urban sprawl. I strongly object to Hitchin's proposed development in principle at Oakley Farm, which is still home to some of our most nationally-threatened Farmland birds & consequently deserves our stringent protection, as does the Cotswold AONB, which should be sacrosanct

We need to work with wildlife & I'd love to see Oakley Farm run as a Nature Farm Model, like the RSPB's Hope Farm in Cambridgeshire or the Knepp Estate in Sussex.

Oakley Farm is home to at least 27 Threatened Local Bird species & 22 Common species, meaning that in the Breeding Season it is home to approx. 50 species. We are responsible for their care or otherwise. See original letter for lists.

Fox, Grey Squirrel, Badger & various deer & bats all call the farm home & there are biodiverse insect communities. Many trees are to be found, e.g. Valuable Oaks for Wildlife, but sadly there are no TPO's. A myriad of Native Plants & shrubs thrive on the site. The farm track is especially important as a Green Lane for wildlife, in particular insects, wild flowers & small birds. Surely we shouldn't be breaking the bonds of these close-knit wildlife communities. Let us build on Brownfield Land of little value to wild species - this makes far more sense.

The Glos. Wildlife Trust's Greystone's Farm Nature Reserve at Bourton-on-the-Water could also be used as a model for Oakley Farm, as both have archaeological antiquities. Oakley's Nissen Hut could be converted to an Interpretative Centre like the National Trust have done at Croome in Worcs.

In our country of 66 million people + , many children have precious little contact with Nature. What sort of a Country do we want for our children & theirs? The answer should be one that values all forms of life & not just people. We need nature for our Mental & Physical well-being & it needs our Protection to Survive - the needs are mutual.

It would be a Tragedy & a Travesty if this beautiful, green, wildlife-filled, locally- & nationally-important archaeologically, local amenity were to be lost forever under bricks, mortar & concrete. This must Not happen.

I strongly urge the Planning Committee to reject this audacious & outrageous bid to ruin this beautiful part of Our Cotswold AONB/Heritage, for the sake of all it's wildlife & it's proud champions of our Natural History, like me, who care about what is the right & proper thing to do & always will.

Friends Of Oakley Farm Pasture
Slopes

Comments: 17th August 2020

Our objection is formed by the two attached documents:

- 1) Main objection (FOFPS Objection.pdf)
- 2) Accompanying photo catalogue (FOFPS Objection - Photograph Catalogue.pdf)

[Objection and photographs attached.]

Comments: 7th January 2021

Addendum attached.

47 Imjin Road
Cheltenham
Gloucestershire
GL52 5JU

Comments: 23rd July 2020

More building over green fields, more building in an area that is already struggling in terms of local facilities. The local schools are all full, the doctor's surgeries are all full, with the one in Prestbury moving to Bishops Cleeve and the site turned into houses.

The old Premier Products site on Bouncers Lane is being turned into housing, the existing development at the top end of the old GCHQ site is still being completed.

Cheltenham has large brownfield sites that should be built on before we tarmac and concrete over more of the countryside.

The recent lockdown has shown just how important green spaces are - why not learn from that?

Hewletts Farm
Aggs Hill
Cheltenham
Gloucestershire
GL54 4ET

Comments: 29th July 2020

I object to this application.

I have lived on Aggs Hill for several years and I have seen a marked increase in the amount of traffic which uses Harp Hill. Our household which has two cars probably travel up and down Harp Hill a minimum of 6 times per day. If 250 houses are built, even if they have one car and they leave the house twice a day that would be 500 extra car journeys. The bottom of Harp Hill is quite hazardous due to the parking on the side of the road by the residents, pub customers and Battledown Childrens Centre visitors. Combined with this it is also difficult to access Priors Road at the roundabout due to visibility of vehicles travelling from the Sainsburys direction. I note that a traffic survey was conducted in September 2019. I could not see a mention of a date and I wonder if this survey was carried out during term time for St Edwards school. Traffic volume has a marked increase during this time. Harp Hill is used by many walkers, joggers, and cyclists. It is also the main access road to Cleeve Common so is heavily used by dog walkers who drive to Cleeve Common to exercise their dogs. Areas of Harp Hill have no footpaths, so it is already very hazardous for walkers and joggers. An increase in traffic entering and leaving a new estate would increase their risk. It is also cut through to get to Charlton Kings/London Road. Access to London Road from Greenway Lane by St Edwards school

is very poor. The traffic lights allow only a few cars through at each change, so traffic already backs up around the sharp bend at this location.

I am also concerned about flooding in the area surrounding the site. The amount of water which runs down the hill when raining is so great it has carved a path down the edge of the road on Aggs Hill. This water must go somewhere. Now I am sure it soaks away on green fields; take those away and where will it go? Recently during one storm I noted that some of the drains in the area could not cope with the amount of run off water, so the drain covers popped up. Due to global warming we will see more rainfall so this will only get worse.

This is an area of outstanding beauty. It has an abundance of wildlife. I have seen badgers, foxes and deer as well as a barn owl hovering over this land. This will be in addition to bats, moths, butterflies, stoats, mice and flora which will all be lost or lose their home.

Finally, I am concerned about the lack of school places. In the last two years a member of my family and her junior school aged child looked to move into the area. During the process she looked for a school place for her child. There were no places available in the area. Even though it was not really an option she checked the private schools, but all these were full as well. If 250 houses are built and you say there is on average one child per household, you will need to find 250 extra school places.

4 Hillview Road
Cheltenham
Gloucestershire
GL52 5AD

Comments: 31st July 2020

Walking up Harp Hill and beyond on a weekly basis I was sad to see this proposal.

1. It is an area of AONB so why build on it.? We regularly see deer, owls and other wildlife. It's a lovely area of quiet and beautiful countryside enjoyed by so many people.
2. Harp Hill and linking roads are narrow with partial pavement. This route is regularly used by walkers, cyclists, runners, children with scooters/bikes/prams and dog walkers. You already need to walk with care due to the narrowness of the road and the speed of some car users. Adding another c. 500 cars to this is not conducive to road safety.
3. Priors Road is busy, especially at commuting times. The junction at the bottom of Harp Hill gets congested. Exiting Hillview Road is difficult already.
4. Having recently moved back to area and experienced the increased traffic levels, the local road network is not designed for more traffic.
5. Flooding is another area of concern. Having seen the volume of water which comes down Aggs/Harp Hill in heavy rain and the silted up drains, surely removing natural drainage and replacing with concrete will exacerbate the issue.
6. I understand there may be another new development in Bouncers Lane, again adding more traffic to the area.

We would like the Council to not approve this application.

Riseley
Camp Road
Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PS

Comments: 31st July 2020

The roads cannot take any more traffic. They are already busy from the Eden Project, and there are also new houses being built at Cromwell Court and Sovereign House. 250 houses will mean another 500 cars.

There are no pavements and walkers have to walk on the road in the area.

Also, the schools and doctors surgeries are already oversubscribed.

Keyhold Cottage, The Ridge
Bussage
Stroud
GL6 8BB

Comments: 4th August 2020

I would like to lodge a formal objection to the planning request to build 250 new houses on the Oakley Farm site. This land has been designated as an AONB and as such should remain un-developed as was intended at the time of the establishment of this designation. Under the CROW Act 2000 it is the responsibility of Local Authorities to protect such areas and to consider the development of a housing estate of such a size, is at total odds to the intention and letter of the act.

As well as being an AONB, the location of this site is unsuitable for such a large development. The access is proposed via Harp Hill but this road is narrow and already presents dangers to pedestrians, cyclists and drivers due to the narrow and winding nature of the road and a massive increase in vehicle traffic, (of circa 500+ cars at least twice daily as residents go to and from work, shopping and school), is simply not viable and will present real danger to all road and footpath users.

My understanding is that there is already a Gloucestershire and Cheltenham Housing Plan and this proposed development is not part of that. There are many brownfield sites in Cheltenham and further afield across the county which could be developed for housing and which are already served by transport routes and local infrastructure and these should be exhausted before considering further eating into the pristine countryside.

30 Slad Way
Cheltenham
Gloucestershire
GL52 5FA

Comments: 5th August 2020

We are writing to object to the planning proposal of 250 residential dwellings on Oakley Farm, Priors Road.

Firstly we would like to raise concerns regarding the significant impact this will have on local amenities, specifically on local schools which are already oversubscribed.

The primary schools within the catchment area of the proposed developed are already struggling to sustain the ongoing Oakley Grange Development which is yet to complete and an additional 250 houses will cause further shortages in places.

The additional houses would mean that the site would be hugely overdeveloped with the 4 phase Oakley Grange development still ongoing and no local schools being proposed.

There would also be a detrimental visual impact on the local area. The surrounding area is of outstanding natural beauty, with it's proximity to Cleeve Hill and additional development can be seen from afar.

This area has already been heavily developed, leaving less greenery and impacting on local wildlife.

Harp Hill is already unable to sustain the increasingly high volumes of traffic from the growing development in the area and is used as a cut through to avoid the excessive London road traffic.

The traffic travels at high speeds down the hill, which is dangerous in a residential area and opposite Battledown School which already has ongoing parking issues opposite

High Grove
Greenway Lane
Charlton Kings
Cheltenham
Gloucestershire
GL52 6LA

Comments: 6th August 2020

I object to the outline planning application to build a large number of houses (currently 250) on north facing slope of Battledown Hill at Oakley Farm because this proposal constitutes gross and inappropriate development of a highly sensitive site, designated as an area of outstanding natural beauty. Policy requires conservation and enhancement of sensitive landscapes, not obliteration of them. The Oakley Farm fields have rightly not been included in the Local Plan as an appropriate place for intensive residential development. To do so would be to cause irreparable damage to this small section of the Cotswold AONB and to ruin the appearance of the unique hill above it. Views towards Battledown and Cheltenham from the higher vantage points of the AONB would also be degraded.

This north-eastern corner of our town has already been very heavily developed in recent decades since the closure of the GCHQ site there, and the infrastructure is creaking. Approved construction work is still in progress on the site and both Harp Hill and Greenway Lane already suffer the consequences of greatly increased traffic flows. The additional daily burden of hundreds of new car journeys from Oakley Farm through Harp Hill would be intolerable, without major improvement to local roads.

This arbitrary application should be rejected, and new housing provided only in line with a coherent and well-supported planning process.

The Uplands
Stanley Road
Cheltenham
Gloucestershire
GL52 6PF

Comments: 8th August 2020

1. This is an important Area of Outstanding Natural Beauty and it is of material size (c.37/38 acres). It doesn't make sense to develop this land given the obvious geological & environmental issues/consequences (e.g.flooding and removal of natural wildlife habitat, etc.) when there are better options available. Furthermore such an action is irreversible. I wasn't aware that development was allowed on AONB and I wasn't aware that this development is in the Town or County development plans - there are many better alternatives including brownfield sites
2. The area is a rich wildlife habitat & haven - we have owls and other birds of prey which rely on this areas for food etc. The area also includes valuable indigenous trees and plants which will be destroyed and not replaced.
3. The land forms part of an important wider view/vista from many vantage points including the Cotswold Way and from many homes in Cheltenham. One of the many reasons that people live, move and visit Cheltenham is to enjoy such views. The views of the lower Cotswold escarpment slopes are being steadily eroded to the detriment of all - apart from the developers
4. There will be material wider environment impacts of this development including increased pollution which is already a very difficult issue in Cheltenham itself. as you know Cheltenham is an effective bowl and air pollution can not escape adversely impacting residents and visitors. There is a compounded impact of such a development where positive vegetation (including trees) is swapped for increased pollution associated with housing and traffic.
5. I don't understand the planning process but it does appear that the developers proposal is very high level and lacks any real detail which would allow an informed review. This seems to be a usual tactic for developers which minimises thought & effort (cost) on their part but costs the council and the community time, effort and money. The developer will then gradually drip feed its real plans over time in the hope that by attrition and persistence it will wear down the will of the council and the community. I don't like this 'one way' practice and it should be strongly discouraged because it plays into the hands of the developers with no benefit to the council or the wider community. I can't read any positive environmental proposals in the application and I can't read anything which benefits Cheltenham or the immediate local community. I see only downside for everyone other than the developer.
6. I don't know how the wider Town or County Plans are drawn up nor what plans are currently in place for the coming years. However, I do know from my own experience, and that of my family, that Cheltenham's wider infrastructure is already seriously stretched. For example, we could not get secondary school places for our two

children within 3+ miles of where we lived due to over demand (this did not get resolved and remains a very difficult issue for us and for our children). We can not get an NHS dentist - months/years wait. Doctors appointments generally demand weeks or months wait. Local road (e.g. Harp Hill) are falling apart (swerving lorries, vans, etc avoiding potholes on blind bends will inevitably lead to accidents - as well as damaging cars etc). Whilst we all welcome people wanting to visit and to live in Cheltenham I can't see any commensurate growth in local services to cater for the material growth in housing. However, I can see reductions in local services. I think that there needs to be some urgent rebalancing to address this.

I would therefore be grateful if you could carefully consider this objection to the proposed development. I can see developer benefits but wildlife, the environment and the community all lose out

2 Coleford Road
Cheltenham
Gloucestershire
GL52 5GR

Comments: 8th August 2020

Congestion on harp hill is already too high. It is a green space that should remain protected and I have seen owls and birds of prey in the area.

8 Winstonian Road
Cheltenham
Gloucestershire
GL52 2JE

Comments: 11th August 2020

I am horrified to hear that this application has been submitted.

1. Protecting our natural green spaces should be a top priority given all we have been through with COVID-19 lockdown. It has been well documented that living in areas with grass and trees has been linked to lower risk of various health conditions such as high blood pressure and cardiovascular disease. As well as physical health, greenspace is associated with positive mental health. In addition protecting the diversity of the land, its natural wildlife such as the deer that wonder and birds that nest. During lockdown the land was used to graze livestock again which brought a sense of calm.
2. The traffic is already far too busy for the type of road Harp Hill is, with very little in the form of traffic management etc. At the moment the hedgerows etc. act as a buffer to some of that traffic noise, which will increase once 500 plus cars are descending on it every day... let alone the promised construction traffic. There are already lumps and bumps in the road which prove hazardous. Every day I witness unnecessary speeding as people use it as a cut through from Charlton Kings. This will all increase.
3. Is there really the infrastructure there? Form both a community and environmental point of view. An additional 250 homes to churn up the land, add to the now frequent flooding at the bottom of Harp Hill due to the overdevelopment of the area already.

The road can't support an access point as it stands. From a community point of view there isn't enough nurseries, schools or doctor's surgeries to accommodate a further 1000 or so local residents.

4. All this will impact on Cheltenham as an AONB. The view from Cleeve toward Harp Hill already shows the impact of the GCHQ housing re-development. It needs to stop; building on AONB and green spaces goes against all national policy and yet this application is under consideration. Any development can't be undone. It will spoil the landscape for decades to come.
5. This is not just about the local residents to Harp Hill; it impacts all residents in the area that seek Harp Hill as a safe green space to walk to and enjoy. Especially during lockdown Harp Hill has enjoyed a stream of pedestrians using the road to escape town and access the countryside and tranquillity - which includes the proposed development land and its views over the valley. To me this planning application goes against the idea of a green recovery and common sense to anyone who knows and loves the area.

7 Carisbrooke Drive
Charlton Kings
Cheltenham
Gloucestershire
GL52 6YA

Comments: 12th January 2021

In my opinion, you have already built a load of house on the Oakley site, why do you need more?

I think there are plenty of house up for sale in this town/surrounding areas. You will also be creating more traffic, when you could spend the money more wisely on creating more bike friendly areas or improving road surfaces etc.

22 Copt Elm Road
Charlton Kings
Cheltenham
Gloucestershire
GL53 8AB

Comments: 20th January 2021

I live in Copt Elm Road and , like many others, enjoy walking up to and around the surrounding hills, including Harp Hill. The views are very beautiful and will most certainly be spoiled by the building of such a development. I often see wildlife, particularly deer in this area and the habitats and therefore the survival of these creatures would be severely threatened if it is allowed.

I have noticed a pronounced increase in traffic (Including heavy vehicles) using Greenway Lane/ Harp Hill in the last few years and feel that any further increase would be dangerous for both drivers and pedestrians. It is quite difficult at the moment to negotiate one's way along Harp Hill - there is not even a proper footpath for walkers.

Since this is part of a designated AONB which the Government "vows to protect from inappropriate development" , it seems unthinkable that any such development as that proposed could be allowed in such a beautiful place.

54 Brighton Road
Cheltenham
Gloucestershire
GL52 6BA

Comments: 30th January 2021

Cheltenham council should be moving to protect our AONB, the climate and environment needs protection now more than ever.

54 Brighton Road
Cheltenham
Gloucestershire
GL52 6BA

Comments: 30th January 2021

The negative impact on surrounding wildlife and the environment not justifiable. We must protect our green spaces wherever we can.

70 Little Herberts Road
Charlton Kings
Cheltenham
Gloucestershire
GL53 8LN

Comments: 6th April 2021

This land is part of the AONB and therefore has protected status. This should mean that it is only built on in exceptional circumstances and it should also be sympathetic to the surroundings. This development fulfills neither of these criteria and therefore should not go ahead. It is inappropriate for an AONB.

The AONB land round Cheltenham is very precious for outdoor recreation and health (as we have recently found out). The fresh air and views with the chance to experience wildlife are valuable to our mental health. We need to retain these areas.

There has been an explosion of building round Cheltenham over the last few years with sites still being developed. There needs to be time for that development to be completed and bedded in, to see what the impact is on traffic, schools and facilities and pollution etc, before embarking on any further large scale building development.

15 Wessex Drive
Cheltenham
Gloucestershire
GL52 5AF

Comments: 19th July 2020

Thank you for the opportunity to comment on this planning application (20/0169/OUT). My comments relate specifically to the access arrangements for the site.

The 'built' part of this development is proposed to be constructed adjacent to the existing Battledown Park estate, presumably to leave the visually attractive sloping terrain clear of development, as it rises up to Harp Hill. Despite the immediate proximity of Battledown Park, this proposed development completely ignores opportunities to connect into this adjacent built environment; indeed, there are no proposed connections for any mode of transport at all! It is perverse that this relatively small development of just 250 dwellings should have its sole highway access made from Harp Hill (which is more remote) rather than using adjacent existing potential highway connections at Brockweir Road and possibly Pillowell Close.

The National Planning Policy Framework places sustainable development at its core. To achieve this, new development should be fully integrated into the existing urban fabric where possible, to maximise sustainable access opportunities.

There are a number of reasons why pursuing access integration for this development with the Battledown Park estate, rather than Harp Hill, would deliver benefits to existing and future residents, the Local Authority and the natural environment. These include:

Visual Intrusion

The provision of an expensive new highway connection from this development to Harp Hill will require the construction of a carriageway on a steep gradient, cutting through the proposed green infrastructure allocation for this site. Despite proposed extensive tree-planting, this new link will be highly visible across a wide geographic area (easily as far away as Prestbury and beyond), ruining this attractive aspect of the site.

The Battledown Estate's road network connects into the local highway network at Priors Road at a purpose-built, signal-controlled junction. I am sure that a technical assessment of this junction would prove that there remains plenty of capacity to accommodate the proposed additional demand of this proposed development of just 250 dwellings, if it was properly integrated into the adjacent Battledown Park estate's road network?

Unsuitability of Harp Hill

Although subject to a 30mph speed limit and part of Cheltenham's urban fabric, Harp Hill is still remarkably rural in nature, narrow throughout its length, with no continuous footways. It is well used by pedestrians (often with children and dogs) and cyclists heading up into the Cotswolds for leisure trips, particularly at weekends. Unfortunately, the road can be subject to inconsiderate and dangerous driving occasionally, but it is hard to mitigate against this without very expensive engineering interventions or road closure, which would disadvantage local residents.

Structurally, the road is in a poor state of repair, and becomes particularly treacherous during extreme weather events such as high rainfall, snowfall and ice. Whilst Harp Hill is gritted, it is very steep, and so can become very hazardous indeed. The proposed highway access to this development would suffer the same fate. Instead, a highway connection into the Battledown Park estate would offer a much shallower (almost level) gradient, connecting to designed highways with effective drainage provision, which would preserve essential access during severe weather events.

Active Travel (Walking and Cycling) Access

The nearest trip attractor to this proposed development is the large Sainsbury's Store, off Redmarley Road, with other useful shops nearby. The cycle parking for the Sainsbury's store is conveniently located for direct access from the Battledown Estate, without having to join vehicular traffic accessing and egressing the store.

The proposed walking and cycling route via the Oakley Farm access, whilst useful and attractive for pedestrians, will not be useful or safe to use for cyclists as the connection with Priors Road has very poor visibility indeed. At peak times, it can be extremely difficult to safely join the traffic at this point, on a bicycle. Unfortunately, this will act to discourage cycling from the site as it will be perceived by residents (quite rightly) as unsafe.

Instead, provision of at least one surfaced active travel connection into the Battledown Park estate would offer a much more attractive access route for both pedestrians and cyclists. From here, users will be able to make use of existing quiet routes to access Sainsburys (Redmarley Road), join the traffic safely at the signal controlled junction on Priors Road and then access a variety of destinations across the town and beyond. This route is near flat throughout and so attractive for use for all.

6 Bicknor Drive
Cheltenham
Gloucestershire
GL52 5GF

Comments: 18th July 2020

I have lived at my current address in Battledown Park for 10 years. Over that time the traffic in the estate and generally along Priors Road and Hewlett Road has increased significantly.

Apart from the general 'through-traffic' there is a significant amount of traffic to and from Sainsburys, resulting on parking on the recently painted double yellow lines - and I have never seen any enforcement of these parking restrictions.

I am also extremely concerned about the increase of traffic to and from the proposed estate. In Battledown Park, a significant number of houses have more than one vehicle which was clearly not predicted in the planning approval. The Oakley Farm development is likely to generate, in my opinion, at least 250 vehicles which will add to the already busy traffic on Harp Hill, and more complexities at the mini roundabout where it joins with Priors Road and visibility is restricted.

Oakley Farm, whilst not publicly accessible, provides a necessary green space in an ever-eroding countryside. This need was demonstrated during lockdown when parks and green spaces were well-used. Lockdown also made me appreciate the silence and the empty roads and the sound of birdsong. We must take into account the environmental impact of 250 extra houses as well as the impact on the quality of life for existing residents.

I strongly object to this planning application. Ideally, I would like to see no further building in this area, but at the very least this number should be reduced.

9 Briarbank Rise
Charlton Kings
Cheltenham
Gloucestershire
GL52 6XR

Comments: 18th July 2020

Objection

I strongly object to the planned building of 250 houses on this site. The access to the development would be on roads already very congested, narrow and unsuitable for a huge influx of further traffic.. The roads are already used by many as a shortcut to the local schools and down to the A40. Near misses are frequent as the road is narrow. There is no supporting infrastructure for The addition of this many houses with the associated vehicles and people. The area is AONB - This should be protected. What is the point of designating an area if it is then built on and the beauty destroyed. why build here when there Are other more suitable sites.

85 Whaddon Avenue
Cheltenham
Gloucestershire
GL52 5NN

Comments: 24th July 2020

This area is walked several times a day by dog walkers including myself and through this we regularly see the wild life, in particular Deer. The habitat of this wildlife is being destroyed already by the current land owner applying for planning permission who has been seen to be aggressive towards the general public walking along the public footpaths.

There has been continual burning going on up there including during the pandemic where the Virus has been causing respiratory problems itself, never mind additional fumes from the burning.

The wildlife habitat will be ruined by this development and Harp Hill will not be able to cope with the additional traffic going through it as it backs onto Hewlett Road which is already overflowing with traffic jams. The development will be an eye sore in such a place of natural beauty.

Grey Gables
Oakley Road
Cheltenham
Gloucestershire
GL52 6NZ

Comments: 2nd August 2020

I object to this application.

1. The access proposals are totally inadequate.

Harp Hill is a narrow road without footpaths, in many places, and in very poor condition. It is already dangerous and used as a rat run to avoid traffic on the A40/Hales Road. Many local people use this area for walking and the lack of footpath makes it dangerous already. Particularly at the point where the developer proposes to access onto the road. Additional car journeys to and from the proposed estate would make a serious accident very likely.

During construction the road would not cope and again an accident would be highly likely.

2. The Area is an AONB. Why build on this land when there are so many other sites that are less environmentally sensitive.

3. The density of housing appears to high for the space.

4. Traffic congestion on the main roads around this area is already high. This site will overload the system and result in residents seeking rat runs such as Greenhills lane, Aggs Hill and Ham Hill. These roads are not suitable to take additional volume of traffic.

5. The junctions at the bottom of Harp Hill at the bottom of Greenhills Lane (at 6 ways) are already overloaded causing traffic congestion and pollution.

165 Hewlett Road
Cheltenham
Gloucestershire
GL52 6UD

Comments: 2nd August 2020

250 dwellings on an AONB site in such an important location at the base of the slopes is just an opportunist for profit punt by the developer and against the interest of the general public.

The main access from Harp Hill is inadequate and potentially dangerous. The main access to the centre of town will be Hewlett road which already has major pinchpoints for traffic at the junction with Pittville Circus by Berkhamstead primary school in particular.

If this application goes ahead at all which I am very much against then traffic calming is essential at this point. Motorists currently speed. The number of dwellings also needs decreasing with more land given to green space. Even this is a poor compromise to a very detrimental planning application for Cheltenham which once agreed will spoil this area indefinitely.

OPPOSE.

16 Oak Manor Drive
Cheltenham
Gloucestershire
GL52 6SY

Comments: 2nd August 2020

It is very dangerous crossing Hewlett Rd to get to Tesco already with traffic coming from 4 directions. Lots more traffic will worsen the situation and I cannot see where another road could be built to ease the congestion.

There is also no mention of building a doctors' surgery which we were promised when the development which includes Sainsbury's was built about 10 years ago.

17 Wessex Drive
Cheltenham
Gloucestershire
GL52 5AF

Comments: 2nd August 2020

We are writing to OBJECT in the very strongest terms to the above planning application proposing to build 250 houses on the Oakley Farm site.

Firstly, it is hard to understand how this application has even been considered given that this is an AONB. Only today 2.8.20 Robert Jenrick - Secretary of State for Housing, Communities and Local Government detailing the new "sweeping planning reforms" stated Areas of Outstanding Natural Beauty and the green belt will be protected. On that basis alone it is difficult to see how the proposed development can be approved.

That said we offer the following points in support of our OBJECTION:

INFRASTRUCTURE - The original planning application for the Sainsburys development included a doctor's surgery, something that never saw the light of day. To consider building another 250 dwellings without providing the necessary supporting infrastructure of doctors/dentists/schools/bus routes etc is totally unacceptable. There is also the consideration of how hospitals in Gloucestershire are expected to cope with the ever increasing demand, particularly Cheltenham General which, despite admirable effort from our MP, is struggling to maintain it's status.

FLOODING - The large Sainsburys development has already had a detrimental effect on the ability for land to drain without flooding. Water runs through the Wessex Drive estate like a river in heavy rain and Priors Road, at the junction of the public footpath, is regularly flooded across the entire width of the road, proving that the drains are unable to cope with the existing run off, never mind any increase.

SEWERAGE - The existing sewerage system in Cheltenham is well known to be antiquated and in need of considerable upgrading. To put further pressure on this without ensuring an adequate, additional sewerage alleviation programme will only exacerbate existing problems of sewer collapse, something we have already experienced in Wessex Drive recently.

Page 181

TRAFFIC - Additional traffic from the large Sainsburys development has already made the roads around this area much busier and more dangerous. To add a further 250 dwellings with the potential increase of 500+ vehicles, entering/egressing via Harp Hill, a road not only in an appalling state, with a challenging gradient and treacherous in bad weather, will only serve to antagonise the bottleneck of traffic and increase pollution and more importantly the potential for accidents.

PEDESTRIANS - The lack of pavements from part way up Harp Hill, combined with increased vehicular traffic puts pedestrians at greater risk.

ENVIRONMENT - There has been much in the public domain about the need to protect our endangered wildlife, flora and fauna. This will only serve to fly in the face of that.

OTHER POTENTIAL SITES - There are numerous other sites in and around Cheltenham, including unused carparks and derelict buildings which could serve more usefully as potential sites for additional dwellings. Not only would this have the benefit of tidying up a number of "eyesores" in and around the town but would safeguard greenbelt and AONB sites, and should be investigated as a priority.

Greenacre
Stanley Road
Cheltenham
Gloucestershire
GL52 6QD

Comments: 3rd August 2020

I am writing to say how horrified we are to hear about yet more development in our local area . Having just witnessed the building of a huge estate built at the back of Sainsbury's, and the pressures this has had on the local roads and amenities, building 250 houses is obscene . This could bring as many as 500 cars to the small local roads which are all ready busy causing delays to travelling times , especially at rush hour. there will be more pressure on schools, GP surgeries etc and at a time when we are trying to be more socially distanced, we will be forced to live in a more crowded way with congestion on pavements and pathways. This AONB is home to lots of wildlife which will be forced to move elsewhere as well as impacting on the beautiful views from cleeve hill . The area is also prone to flooding so loss of fields will no doubt impact on flood defences. The noise pollution from yet more building is stressful and disturbing what should be a peaceful area to live. I am also worried that the agreement to more building on greenspace will set a precedent for further housing developments and that is not why we moved to this area. I strongly feel these pastures should be protected and we should be encouraging building on sites which are less sensitive or using brownspace areas instead.

165 Hewlett Road
Cheltenham
Gloucestershire
GL52 6UD

Comments: 5th August 2020

I object. Too much traffic and too much concrete in an AONB

13 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 5th August 2020

I object to this development. If the quantity of houses built it will cause further damage to the already deteriorating roads including harp hill which is a pot hole master piece and this development will access through it. let alone the amount of traffic you will be bringing to the area which the roads can't take. The surrounding fields and green areas are what make this prestigious place to live and if you take that away you are not only devaluing the area but also ruining it for the wildlife.if this goes ahead I will want to move away myself.

12 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 5th August 2020

I strongly object to the proposed development on a site of AONB which will have a detrimental effect on wildlife and ancient trees. Additionally the extra traffic on Harp Hill would make a busy road even more congested. Local amenities such as schools will also be stretched on terms of their capacity to accommodate more children in what is already a well built up residential area. Thanks

Half Acre
Harp Hill
Charlton Kings Cheltenham
Gloucestershire
GL52 6PR

Comments: 5th August 2020

I strongly object to the planning proposal 20/01069/OUT for the following reasons:

1. The Local Plan for Cheltenham Plan that was adopted on the 20 July 2020 at a full council meeting of Cheltenham Borough Council, does not allocate this site for development. In addition, the planning proposal is also contrary the Joint Core Strategy and National Planning Policy Framework.

2. The proposed site has been allocated the status of AONB, which is in place to protect the land to conserve and enhance its natural beauty. Paragraph 172 of the NPPF policy states the following on AONBs:

"Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and

extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated"

Consequently, planning permission should be refused as the proposed development does not meet any of the criteria stated above. This argument is strengthened by the fact the Local Plan has identified other suitable sites around Cheltenham to meet the required housing needs.

In addition, I live opposite the proposed site and have regularly observed Sparrow Hawks, Bats, Red Kites, Kestrels, Green Woodpeckers, Owls, Badgers, Roe and Muntjac Deer within the boundaries of the pastures. Any development will surely impact the conservation and enhancement of wildlife and will result in the permanent, irreversible loss of this important green space.

3. The proposed access road for the development is via Harp Hill, which will generate many hundreds of extra vehicle journeys each day. This road is no more than a country lane and is already over-utilised, especially since the new housing development with access at the bottom of Aggs Hill has been completed. In addition, the congestion at the junction of Harp Hill and Hales Road, as well Greenway Lane at the Sixways traffic lights during peak hours is already a huge problem for the local area. With no mitigation in place, this proposed development would only add to this issue.

4. There is no provision for a school, Doctors or Dentists on the proposed site. Currently, these services are already overloaded in the local area and with the proposed additional 250 dwellings, many local residents will need to travel large distances to send their children to school or receive healthcare

Comments: 22nd September 2020

Letter from Helix Transport Consultants on behalf of Half Acre and Cleevesyde attached.

1 Ashgrove
Beeches Road
Charlton Kings Cheltenham
Gloucestershire
GL53 8NF

Comments: 5th August 2020

If built, this AONB land will be lost forever as a local amenity for future generations of Cheltenham, Oakley, Whaddon and Battledown. The application represents misuse of

housing policy, where the drive to build more houses, no matter how affordable, to meet housing targets is at the cost of our most beautiful local landscape.

8 Erin Park
Stroud
GL5 3TW

Comments: 5th August 2020

This application is a clear and utter failure to residents of Cheltenham Borough, AONB and the morals that encompass our society. The suggestion of this application alone is outrageous and a slap in the face to all who live within the district.

For 11 years I lived on Harp Hill, walking up and down to school and back every day from 2008 - 2013. every year I witnessed the traffic increase, drivers getting too close to the path, with no bother to my presence, every day it was noisier, busier and the beauty was disappearing. And now you want to worsen these effects, with constant traffic leading to the need of traffic control and lights on the hill, more erratic and horrendous drivers speeding through the streets, more potential for accidents and more pollution of every kind. What happened to respect and safety of the community? This application proves there isn't one clearly.

Not only is this the concern, but what gives you the right to take away an Area of Outstanding Natural Beauty to replace with cheap new builds and congestion? Where is the line drawn? If this were to be approved then what's next? Cleeve Common? Our Parks? Every bit of greenery in Gloucestershire? The reason people visit this area is because of it's beautiful and uncluttered landscapes. Not for bodge job builds that look unsightly and claustrophobic.

I have recently moved to the Stroud area and have found a breath of fresh air with the landscapes and beauty. It's what Cheltenham needs to stay like. It would be a failure and disaster if these houses were to be built just for profit. Is there nothing else on the minds of the contractors other than greed and money that they would spit on the ethos of AONB this much?

I'm am completely and utterly opposed to this application, find it insulting to not only current residents but all who visit this beautiful scenic area and our future generations who will have no power to defend AONBs due to applications like this weakening and diminishing the cause. To pass this would bring shame to the council and a disregard of those who live within the county.

Heath Lodge
Park Lane
Prestbury Cheltenham
Gloucestershire
GL52 3BN

Comments: 6th August 2020

I strongly object to the gradual erosion of our outdoor green spaces for the sake of so called progress.

Harp hill is one of the jewels in Cheltenham's crown and we use it a lot as a walking area but also it is a very important (although challenging) alternative route for cycling to avoid the heavy and dangerous traffic on the main routes.

It is already getting more dangerous for cyclists with the new developments already built (with, I might add, virtually no improvement to the harp hill service road surface) and this proposal will probably render it unuseable if passed.

The impact on wildlife in the area, destruction of a lovely part of Cheltenham, is simply not necessary. All the properties will doubtless be very expensive, so this is just a means for the developers to maximise their profits at the expense of Cheltenham residents.

I realise you are under a lot of pressure for this apparent demand in new housing, but I urge you to do your best to reject further development and erosion of our AONB.

Toynton
Ashley Road
Cheltenham
Gloucestershire
GL52 6PH

Comments: 10th August 2020

This application is yet another attempt to build over irreplaceable green-field pasture land on the edge of Cheltenham, accessed from the already over-used and narrow Harp Hill road.

All this land is within the local AONB and, as such, planners and councillors should be making every possible effort to ensure that there is no development or building of any sort on this land at any time in the future. Land is designated as AONB for a very good purpose, being for the benefit of all future generations, and once built upon can never be recovered.

The proposed development of 250 properties will create many more vehicle movements each day with the only access being via Harp Hill and this road is already over-utilised. Harp Hill is steep and narrow in places (some parts having very poor or non-existent pedestrian pathways), with residential on-road parking between the proposed Site Access point and the B4075 Hales Road/Priors Road junction, such that congestion is already generated in peak hours, leading to lengthy delays. Were the traffic from an additional 250 homes to be added to the existing use, the congestion would become unbearable. Naturally, with such a steep and narrow road, the likelihood of accidents to pedestrians and cyclists would also be increased. Safety concerns alone should mitigate against any planning permission being granted for this land if access is to be via Harp Hill. The only access to Harp Hill road, other than the via the B4075 double-roundabout at the foot of Harp Hill, is through Greenway Lane and Planning Officers / Councillors will be well aware of the already unacceptable level of congestion on Greenway Lane at the Sixways traffic lights during peak hours. This proposed development would only make matters worse.

The local schools and GP surgeries are already overloaded, with no spare capacity. There is no provision for a school or a new GP surgery on this site which puts an

additional strain on already overburdened services, which will be to the detriment of people already living in the area as well as those on any potential development.

We strongly urge you to reject this application.

27 Withyholt Court
Cheltenham
Gloucestershire
GL53 9BQ

Comments: 10th August 2020

I object to this application.

This is an enormous development in an area of outstanding beauty which will result in the loss of local countryside; affect wildlife habitats; impact the views from Cleeve Common and will result in a dangerous precedent for further housing development.

It will also put further pressure on local amenities notably traffic on the roads. Greenway Lane is already very congested during school pick up times and post work times. This would see untenably long traffic queues.

50 The Grove
Hales Road
Cheltenham
Gloucestershire
GL52 6SX

Comments: 12th August 2020

I strongly object to the proposed development for the following reasons: AONB which will be irreversibly damaged; entirely inadequate, inappropriate access planned from Harp Hill, already a dangerous road for pedestrians and cyclists; excessively dense development which will overload nearby roads and infrastructure as well as effects from severe weather.

There are already many documents and comments pointing out the unsuitableness of this proposal which I sincerely hope the council will turn down.

7 Priors Road
Cheltenham
Gloucestershire
GL52 5AB

Comments: 15th August 2020

I strongly object to this planning application. I cannot believe that an AONB is even a consideration for development, especially given recent events and the importance of outdoor space.

The infrastructure is not set up for this number of houses; there are not enough supermarkets, doctors surgeries, dentists and schools to supported the new families

which the development is targeting. My son attends Holy Apostles School and the number of applications per child's space is astronomical. How you can build in an area of heavily oversubscribed schools in beyond me.

In addition the traffic and infrastructure will be hugely affected. As you know Harp Hill is mostly single file traffic with cars parking on the one side and having potentially over 500 cars accessing through this route will cause huge problems and traffic.

I strongly urge you to stop this development which seems to have no consideration for neighbouring houses, families and wildlife.

14 Jersey Avenue
Cheltenham
Gloucestershire
GL52 2SZ

Comments: 17th August 2020

I do not think Harp Hill can cope with more traffic and disruption. What is now a beautiful hillside supporting a wide range of flora and fauna will disappear forever if the development is given the go ahead. Instead of building on beautiful green spaces I think that Cheltenham District Council should look at the sadly many empty premises in the town centre and find innovative ways of making the no longer required retail units into attractive housing and green spaces for all to enjoy.

Wadleys Farm
Ham Road
Charlton Kings
Cheltenham
Gloucestershire
GL52 6NJ

Comments: 20th August 2020

Letter attached.

26 Century Court
Montpellier Grove
Cheltenham
Gloucestershire
GL50 2XR

Comments: 1st September 2020

I am writing to object to the above planning application.

1. Firstly the site is a designated Area of Outstanding Natural Beauty, and therefore under no circumstances should any development be allowed owing to the detrimental effect on the fauna and flora contained within that area and the obvious spoiling of landscape and views.

2. The proposed site is not within the Cheltenham Plan.

3. Harp Hill is already used as a rat run with high volumes of traffic at certain times of day, making the proposed access to Harp Hill quite dangerous.
4. I and my family regularly walk up and down Harp Hill, which has no pavements for a substantial distance. Any further increase in traffic volume would be extremely dangerous to pedestrians.

37 Brymore Close
Prestbury
Cheltenham
Gloucestershire
GL52 3DZ

Comments: 4th March 2021

I am contacting you to express my objection to application 20/01069/OUT for a large scale housing development.

First objection is that this application is to build on an area designated as an AONB an area that I like to visit and one which makes a beautiful boundary for Cheltenham.

Second objection is that Cheltenham already struggles with schooling and 250 additional homes will add to this pressure.

Third objection: is that there is clearly a challenge around Cheltenham to effectively look after roads with potholes or patching on most. More roads means more roads to look after which put more demand on those resources. More houses means more cars again leading to more pressure on roads making them worse.

21 The Grove
Hales Road
Cheltenham
Gloucestershire
GL52 6SX

Comments: 24th February 2021

This area isn't suitable on a number of fronts to allow for an extra 250 dwelling. Roads surrounding this area already extremely busy and the additional traffic will no doubt cause massive congestion and possibly lead to a serious / fatal accident.

21 The Grove
Hales Road
Cheltenham
Gloucestershire
GL52 6SX

Comments: 24th February 2021

Development proposal isn't safe on many fronts.

Warneford Cottage
Sudgrove
GL6 7JD

Comments: 4th March 2021

This is an AONB, no development should be allowed, unless circumstances are exceptional. This does not seem to apply in this instance. Also, the application lacks full detail so it is not even possible to get a complete idea of the plans in a transparent, democratically viable way. With Covid it is clearer than ever how essential AONBs are to mental health and wellbeing, not to mention the wildlife in this area. There should be more AONBs, not less! With environmental protection being a key aim for the future, it is shocking that such an environmentally detrimental project should be entertained at all. The planned development will completely change the character of the surrounding area. I strongly urge you to turn this application down.

Thaylin
11 Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PY

Comments: 17th July 2020

The middle to top section of Harp Hill, where the entrance to the development will be, is very narrow for vehicles travelling in opposite directions and only has a footpath on one side. At the top of the hill there is no footpath at all.

The road is already very busy as it is a main route through to Charlton Kings and is the main route up onto Cleeve Common. We live at the base of the hill and on occasions have difficulty exiting our drive because of traffic queuing at the junction of Harp Hill and Priors, Hales and Hewlett Roads. The increase in traffic that 250 new homes would bring will make the hill even busier, causing increased traffic queues, difficulty accessing and exiting our property and an associated decrease in air quality.

The road surface is already struggling to cope with the volume of traffic and the 'patch repairs' conducted by the council do not fix the problem. In recent heavy rain existing potholes and surface break up worsened, resulting in parts of the road flowing down the hill and blocking the drains. (attachments 2-4)

The combination of current traffic, the narrow road and footpath (where it exists), and deep potholes already creates a risk to vehicles, cyclists and pedestrians. The increase in traffic that the development would bring will increase the likelihood of a collision.

If this development goes ahead with the proposed vehicle access point into the estate the quality of life for the existing residents of Harp Hill will decrease and it is only a matter of time before a collision between vehicles or a vehicle and pedestrian occurs.

Rosemary
9 Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PY

Comments: 17th July 2020
Objection

3 Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6QB

Comments: 5th August 2020

I write to express my wholehearted disapproval of the plans to build 250 new homes on the area of outstanding natural beauty at Oakley Farm Pastures - reference 20/01069/OUT.

As a resident of Harp Hill, my first concern is the enormous increase in traffic which such a development will generate. 250 homes are likely to result in anywhere between 250-500 cars driving to and from these houses on a regular basis. The proposal is for access from Harp Hill, and yet this is a road which is already under strain - narrow in parts, and steep, with a number of cars parked road-side at the foot of the hill by the roundabout. The road is already busy - it is used not only by Harp Hill residents, but also residents on the new Oakley Grange estate, plus it has for many years been used as a rat run for cars accessing Six Ways at Charlton Kings. It's simply not practicable or responsible to allow so much extra traffic on such a road.

Secondly, the location in question is a greenfield site, and habitat to local wildlife. Destroying this green space will result in the loss of our beautiful local countryside, and will disrupt the fantastic views from Cleeve Common which gives local walkers so much pleasure.

I implore you to consider the full and negative impact of giving this development the go ahead.

161 Hales Road
Cheltenham
Gloucestershire
GL52 6TD

Comments:
NONE GIVEN

27 Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PY

Comments: 6th August 2020

I wish to strongly oppose this application and object to the potential development. My principle reason is the inevitable increased volume of traffic using Harp Hill. As a resident for nearly 5 years, I have already seen a large increase due to the new housing development at the top of Aggs Hill, and traffic seems to be increasing in speed, both ascending and descending Harp Hill. I live next to Battledown Day Centre and I am surprised an accident has not yet occurred - I am convinced that an additional 250 properties, some surely with more than one car using Harp Hill for access, will significantly congest the road itself, not to mention the Harp Hill, Hewlett Road, and Hales Road roundabouts and junction, which are already congested at peak times. I have not seen a study of traffic volumes on Harp Hill, and would ask that one is conducted immediately to verify my objection.

Highclere
19 Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PY

Comments: 29th July 2020

I live at the foot of Harp Hill. The amount of traffic using this road has already increased since the GCHQ site was developed. Vehicles moving in both directions often pay little heed to the speed restrictions in force. A further increase in traffic resulting from homes built on Oakley Farm Pastures with access from Harp Hill will be unsustainable and create major safety concerns I object to this proposal.

Harp Hill is not a wide thoroughfare, but is used by HGVs, vans and large heavy construction vehicles as well as cars. Traffic proceeding downhill regularly backs up at busy times from the mini-roundabouts to Battledown Centre for Children and Families and beyond. Entering or leaving my driveway at those times can be difficult and dangerous, particularly when an almost constant flow of vehicles is also proceeding up the hill from the mini-roundabouts. Turning the acute corner from Priors Road into Harp Hill is already hazardous as, until rounding the bend, it is impossible to see the vehicles parked on the road (sometimes on both sides) and those moving towards the mini-roundabouts. All have to compete for gaps in limited space. This already hazardous situation will become intolerable and significantly more dangerous if the planning application is approved.

29 Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PY

Comments: 6th August 2020

I wish to strongly object to the development as outlined. It makes me wonder if the classification of AONB is seen as developer language for "please feel free to build here". I understood that AONB was a recognition of the areas value to society and the wider environment.

The apparent complete ignorance of the potential impact on an already dangerous situation regarding traffic is appalling. Harp Hill is a road with a very steep gradient, those descending the hill carry speed into the narrowest parts of the highway which are consistently far in excess of the speed limit. Those ascending the hill seem to "take a run up" and carry excessive speed into a blind bend where there is no footpath.

The traffic situation is exacerbated by the usage as both a cut through from Six Ways to Hewlett Road, and also by the parking limitations at the lower end of the hill. The local Public house is well supported and means that legal on road parking is frequent and dense. When this is coupled with the parking required by the Battledown Childrens Centre, which has inadequate on site parking for its requirements, it creates a bottleneck allowing only single lane traffic, causing tailbacks both downhill, but equally dangerously at the roundabout junction with Hewlett Road.

It staggers me that when applications are considered, the impact on the local infrastructure is seemingly overlooked.

If developers were made to shoulder the full burden of cost of their proposals, including provision of adequate amenities and access then they might consider more suitable locations.

31 Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PY

Comments: 6th August 2020

My home, 31 Harp Hill, forms part of the Battledown Estate and in the first instance I should like to give my strongest endorsement to the objection submitted by the Trustees of Battledown Estate on 29 July 2020.

In addition I should like to add the following:

1. The Biodiversity Report makes no mention of deer. In fact, various photos of roe deer on the Oakley Farm site are readily available elsewhere on the internet and muntjac deer have also been observed there. Moreover, Harp Hill has signage for deer at various places. A number of roe deer are permanently resident in this area of the Battledown Estate and have been known to stray onto Harp Hill on occasions, which must present a traffic hazard under any circumstances, let alone with increased traffic levels.

2. The Transport Assessment does not discuss the extra traffic flow which will be generated on Aggs Hill, being the continuation of Harp Hill up the Cotswold escarpment. Aggs Hill is a particularly narrow, steep and winding country road which not only gives

direct access from Cheltenham to the Cotswolds Way footpath, but also can potentially be used as a rat run towards Andoversford. Any significant increase in traffic on this hill would be highly dangerous and very unwelcome.

3. The Transport Assessment makes no mention of Gloucestershire County Council's plans to increase pupil numbers at the Battledown Centre for Children and Families (23, 25 Harp Hill) in the coming years, see:

<https://glostext.gloucestershire.gov.uk/documents/g9396/Public%20reports%20pack%20Wednesday%2017-Jun-2020%2010.00%20Cabinet.pdf?T=10>

This expansion has the potential to generate considerable extra traffic, on-street parking and congestion on Harp Hill and should be taken into account.

4. Both Harp Hill and Aggs Hill are cycle routes (hill climbs) of national importance, see e.g. <https://www.climbbybike.com/climb/Aggs-Hill/9992>

In particular, Harp Hill featured in the 2014 Tour of Britain cycle race when large crowds gathered on the hill. As such, these hill climbs generate considerable cyclo-tourism. The introduction of the proposed new junction on Harp Hill would provide an extra hazard for cyclists, particularly if the junction is steep and cars are pulling out quickly into gaps in a busier traffic flow. Additional traffic on Harp Hill would also necessarily also increase the overall danger to cyclists.

5. I have concerns about the impact and duration of the building works associated with the proposed new development. The flow of contractor vehicles up and down the hill would be immense and, as has been seen with recent construction work higher up the hill, the lorries most often do not carry tarpaulins (thus often shed soil etc.) and frequently speed, so that monitoring of this construction traffic for adherence to regulations would need to be strict and properly enforced, remembering that Harp Hill is a residential area.

6. I have related concerns about the disruption which would be caused by the proposed mitigation works on the mini-roundabouts at the foot of Harp Hill, which would undoubtedly lead to major congestion not only on the hill but in the broader local area.

33 Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PY

Comments: 5th August 2020

I object to this planning application. The proposed site is designated as part of The Cotswold AONB.

This will create excessive traffic on Harp Hill which already very narrow, with many walkers, runners, and cyclists. It also has many parked cars. In the past few years, the road has become excessively busy due to houses built on the old GCHQ site. All the extra traffic will make Harp Hill congested and unsafe. This development will lead to flooding issues and will put excessive strain on the other utility services for the nearby residents.

Basement
Battledown View
Oakley Road
Cheltenham
Gloucestershire
GL52 6PA

Comments: 31st July 2020

I have looked at the information available to me regarding this application and having considered the pros and cons I am posting my vehement objection to the proposal.

Whilst there are undoubtedly good reasons with the site being an Area of Natural Beauty, I feel there are two primary considerations that provide a strong case AGAINST the proposal.

1. Pedestrian and Cyclist Safety

The significant increase in the volume of traffic this proposed development will cause will render an already vulnerable stretch of Harp Hill even more dangerous to pedestrians and cyclists. The lack of pathways and the tight and narrow road will become even more hazardous with an increase in the volume of traffic.

2. Volume of Traffic Causing Log Jams

There are a number of issues regarding the suitability of Harp Hill for any additional traffic from the additional dwellings proposed.

The choke point at the bottom of Harp Hill is already congested at peak times with traffic likely to back up even further with the additional volume. This will cause extra delays and add to an already busy and awkward intersection even during the quieter parts of the day.

Other concerns about increasing the traffic is the susceptibility of the road to flooding and the increased damage to the road surface by the additional traffic during periods of excessive rain. Already my property has suffered minor flooding issues because of the poor drainage during the recent heavy rains.

Overall I think increasing the traffic on Harp Hill and the subsequent environmental, safety and congestion problems it will cause form a strong case for this development NOT to be approved.

Thank you for taking the time to consider my objection which is presented in the strongest possible manner.

Battledown View
Oakley Road
Cheltenham
Gloucestershire
GL52 6PA

Comments: 23rd July 2020

I am writing this email to firmly object to the planning proposal 20/01069/OUT.

As a resident living in Battledown Estate by Harp Hill for the reasons listed below:

- 1 Our house is subjected to vibrations from the road with heavy vehicles. Therefore if there damages to our property as a result of the increased traffic and heavy vehicles gaining access to the building site, the council will be responsible for damages.
- 2 Harp Hill can not sustain the increase in traffic with additional cars for the 250 houses.
- 3 There are beautiful trees in the field which will need protecting.
- 4 The local Sainsbury on Priors Road will not be able to keep up with the demand.
- 5 All natural beauty is being destroyed by development.
- 6 Is extra housing needed when there are five newly built houses on Harp Hill, which have not been sold.
- 7 Further development of five houses on Ham Road.
- 8 Additional development of houses behind Cromwell house.
- 9 So many apartment built in town, near CLC and the supreme courts.
- 10 This development will affect many people who use this area as part of their exercise to walk. I hope the additional traffic does not bring fatalities!

The Lodge
Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PU

Comments: 31st July 2020

We are writing to you as Harp Hill residents of over 30 years to voice our deep concern at the planning application for building a 250 housing estate on Oakley Farm land. Our main objections are:

1. Harp Hill is already one of the notorious rat-runs in Cheltenham made considerably worse in recent years by traffic approaching Cheltenham westwards on the A40 being diverted by SATNAV through Whittington/Aggs Hill and from Greenway Lane at Sixways.
2. The daily bottleneck at the foot of Harp Hill and Greenway Lane (at Sixways) will become even bigger adding to the already high levels of pollution caused by this additional traffic congestion.

Wood Bank
Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PU

Comments: 5th August 2020

I have lived on Harp Hill for 26 years now and in that time the traffic has changed dramatically.. It is already extremely busy and also in places dangerous both to drive and almost impossible these days to walk on the upper part safely. Another access onto Harp Hill will cause chaos. This is also an area of AONB and the loss of this green space forever will have a detrimental impact to humans, wildlife and trees. We just CANNOT afford to lose this beautiful Area.

Homewood
Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PU

Comments: 5th August 2020

We are writing to object to proposal 20/01069/OUT on the following grounds:

1) Traffic: a 250 residential dwelling development will significantly increase the number of cars and motor vehicles using Harp Hill, Greenways Lane, Aggs Hill and nearby roads. Issues arising from this will be:

1.1 Traffic. Highway Safety and Accidents - Vehicles. Vehicles regularly speed on Harp Hill. Residents turning into driveways or slowing down to enter the proposed development site on Harp Hill will be at increased risk of being hit by speeding cars if volumes of traffic increase and if traffic calming measures are not put in place. There have been many near miss accidents on the blind junction where Aggs Hill, Harp Hill and Greenways lane join, as cars turn into or exit Greenways lane. Dense fog has regularly obscured the entire junction which sits in a dip in the road. An increase in traffic will exacerbate the risk of a collision.

1.2 Traffic. Highway Safety and Accidents - Cyclists and pedestrians. An increase in cars on Harp Hill, especially if traffic calming measures are not put in place, will increase the risk of a collision between vehicles and cyclists on steep or narrow points, and where they are on a blind bend e.g. near Stanley Road when climbing Harp Hill, or turning right into Greenways lane. Potholes and road surface flooding in heavy rain have been a persistent problem on Harp Hill for many years. Cyclists go wide to navigate around the potholes and streams of water cascading down the hill and thus into the path of vehicles. The road surface water drains halfway up Harp Hill are currently completely blocked with mud. There is currently no designated cycle lane on Harp Hill, nor on the entirety of Greenways Lane (just at the chicane) nor on Aggs Hill. Commuting cyclists, walkers, dog walkers, and leisure / tourist cyclists frequently use these roads, especially to enjoy our AONB and its views, to gain access to Cleeve Common, nearby villages and the

Cotswold Way. Water also pools at the foot of Harp Hill in heavy rain which cyclists go wide to avoid. Pedestrians currently have insufficient foot paths at the higher parts of Harp Hill to safely navigate increased, or speeding, traffic and are forced to cross at dangerous points where pavements run out. Many people walk up Harp Hill for fitness. There is a very high kerb and concrete structure on the left side, half way up Harp Hill as you climb it which cyclists and vehicles swerve wide to avoid hitting with their wheels / pedals and into the path of oncoming descending traffic. This kerb would need to please be addressed if the number of vehicles increases on Harp Hill, for safety reasons. The road could not currently cope safely with a large increase in volumes of traffic, nor wide vehicles.

1.3 Traffic - Noise. The noise disturbance from speeding cars and volume of existing traffic on Harp Hill is already a negative impact on residents and will increase with a higher volume of residential traffic arising from a large-scale housing development. Queuing traffic at the bottle necks at the foot of Harp Hill and Greenways Lane at peak times will also have a negative environmental impact on local residents through noise and air pollution.

1.4 Traffic - Congestion. There is already a significant congestion issue at peak commuting times, or other seasonal times such as race weeks and festival weeks, at the foot of Harp Hill on the roundabout with Priors Road / Hales Road / Hewlett Road and also where Greenways Lane joins the A40 London Road. It can currently take in excess of 20 minutes for a vehicle in a 12 car queue on Greenways lane where it joins the A40, to get through the traffic lights between 7am and 9am, due to the very small window of time allowed between the lights changing and also having to negotiate around cars parked on the road and then on through the lights. An increased volume of traffic will massively increase that wait time and render commuting very difficult due to poor flow. Residents on Greenways Lane already suffer: lack of privacy, noise pollution and air pollution, from drivers and vehicles idling outside their homes waiting to pass through the Sixways traffic lights, and these issues will significantly worsen with an increase in traffic. Queues will also form at the foot of Harp Hill for those wanting access to Priors Road / Hales Road or Hewlett Road, adding time and stress to everyone's commutes. Existing residents' cars could be prevented from leaving their driveways if traffic backs up, and so this traffic flow issue needs to please be addressed. Bin collection vehicles on Harp Hill between 7 and 8am will also massively hinder commuting if traffic increases; cars and cyclists cannot easily or safely overtake a bin lorry as it is due to lack of visibility and cars tending to speed. There will be new congestion problems arising from within the development itself as residents queue to join Harp Hill, especially at peak times, and more than one exit on sites other than Harp Hill should be provided. The flow of cars on Harp Hill will also be impacted by cars slowing down to exit and enter the development, causing new levels of congestion.

1.5 Traffic - wildlife. A range of wildlife is dependent on the habitats either side of Harp Hill and Greenways Lane that the roads intersect and will be negatively impacted by an increase in traffic. There are already frequent roadkill casualties such as deer, foxes, newts, toads, hedgehogs, domestic pets, owls and badgers struck by speeding cars on Harp Hill due to careless driving and speeding. Traffic calming measures and low volumes of traffic will help to protect our wildlife.

Hedgehogs are an endangered species and have been recorded as both live and roadkill on Harp Hill as part of Hedgehog Street. This is a long running national community conservation and mapping initiative run by the British Hedgehog Preservation Society

and People's Trust for Endangered Species, supported by over 80,000 volunteers. Live Hedgehogs are also currently logged on Harp Hill as part of the PTES Living With Mammals Survey which ran from March to June 2020. Hedgehogs are struggling to survive these days in urban and green spaces constrained and divided by roads and need sufficient uninterrupted habitats connected by green wildlife corridors in order to survive. The road and traffic on Harp Hill is already a threat to their survival and any increase in traffic (or reduction in their habitat and green spaces where they roam to forage, mate, shelter and nest, due to urban development) will make their situation worse.

A speeding car recently hit a fox at the foot of Harp Hill and was attended to by Vale Rescue our local wildlife hospital. Badgers have been left at the side of the road. Many nocturnal wildlife live on Harp Hill.

2) AONB and nature conservation.

2.1 AONB and nature conservation - endangered species. Hedgehogs are actively resident in the area as mentioned in point 1.5 above, and have been logged locally on thebighedgehogmap.org crossing the road from Greenways Lane/ Harp Hill onto Oakley Farm Pastures, for example. Hedgehogs live and forage in gardens and fields either side of Harp Hill and Greenways Lane and their already limited habitat is restricted by Harp Hill and Hales roads on one side and the A40 road on the other. Live records of hedgehogs on Harp Hill have been recorded as recently as June 2020 in the PTES Living with Mammals Survey. At least two hedgehog highways (uninterrupted access to interconnecting gardens with hedgehog holes) are logged on Harp Hill on Hedgehog Street. Hedgehogs use the long grass, scrub, shrubs and hedgerows of Oakley Farm Pastures (and Battledown and Greenways Lane gardens and local woodland fringes) as line-scapes and wildlife corridors to safely traverse open spaces, shelter overnight, shield from predators such as badgers, forage for food and build nests. Decreasing the interconnected green spaces in this area and increasing traffic and the risk of road kill will have a two fold negative impact on this vulnerable species. The preservation of hedgerows and the long grass and wild flora that grows beneath and around hedges needs to be preserved and even enhanced within any building development, to ensure the sustained protection of endangered species such as toads and hedgehogs and to reduce the negative impact on other wildlife generally who depend on these sustained green spaces such as deer, foxes, badgers, bats, owls, slow worms and newts, and who need to cross roads in the Harp Hill area.

Owls and bats frequently hunt over our garden at night on Harp Hill and fly over the whole green space which encompasses nearby woodland fringes such as Greenways lane, Battledown, and hedgerows within the Oakley Farm site for example, where insects and mice are to be found.

There are many species of butterflies and moths visiting gardens and green spaces on Harp Hill and surrounding areas. The proposed development site sits at the foot of the Butterfly Conservation Nature Reserve on Prestbury Hill. Green spaces in this AONB need to please be very carefully managed so as not to negatively impact this delicate ecosystem and the interconnecting green wildlife corridor line-scapes and landscapes. In our garden on Harp Hill we logged 9 species of butterfly on the Big Butterfly Count map in July 2020, and different less common species of butterfly are resident in pockets just 500m away from our home closer to Prestbury Hill, surrounding the Oakley Farm Pastures. Conservation projects are underway on Prestbury Hill nature reserve - which overlooks Oakley Field Pastures - to protect endangered butterfly species. If

interconnecting green habitat is lost due to urban development which fragments the green landscapes, then insects and those that depend on insects for food such as bats, birds, hedgehogs and owls will struggle if habitats become smaller and isolated.

The loss of hedgerows and trees in this area due to development will also hugely impact the bird population. In our garden on Harp Hill in January 2020 we logged over 31 species of bird on the RSPB's Big Garden Bird Watch survey.

The impact of light pollution coming from increased street lighting and dwellings on moths, bats and night flying insects would also need to be understood.

Several species of bee are currently resident on Harp Hill. If bee and butterfly corridors could be protected and even extended into any new (reasonably sized) development the benefit to the environment and nature conservation would be huge.

2.2 An AONB should be protected from large scale housing developments. The view across Oakley Fields as part of the AONB will be negatively impacted by a large-scale housing development of 250 homes.

3) Local, strategic, regional and national planning policies:

3.1 This is not a plan-led application and is not in compliance with NPPF requirements. We understand that this land is not designated within the Cheltenham local plan for housing development in the foreseeable future.

20 Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6QG

Comments: 30th July 2020

Hi, I would like to voice my objection to this proposed development for the following reasons:

- This is an area of Outstanding Natural Beauty and needs to be protected for everyone to enjoy. There is no reason in the community's interest to use this land for development.
- More development would ruin the character of the area, the Cotswolds needs to be protected.
- A development of this size would be an overdevelopment of the area, it's not appropriate.
- The development would block the view of a Grade II listed building (the pavilion on Hewlett's Reservoir)
- The Cheltenham Plan did not list this site as a possible site for development. There are other more suitable sites,

Page 200

- As a Harp Hill resident, I do not believe that Harp Hill can cope with the additional traffic that the development will bring. I lost my cat under a car outside my house earlier this year. This area was never intended to be a heavy use road, which is what the development will make it, particularly the area outside Battledown School. Some sections do not even have a footpath. Extra traffic will make it even more dangerous.

Thank you

Golspie
Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PX

Comments: 11th August 2020

I very strongly object to the application. I am a professional who has lived on Harp Hill for more than 31 years and I believe that I am very well qualified to voice my strong concerns.

- There is no dispute by anyone that this is AONB land.
- Safety is a major concern.
- Greenway Lane feeds onto Harp Hill and some years ago there was a tragic accident on Greenway Lane. Consequently, traffic calming measures were introduced. As far as I am aware there has so far been no reference of the accident and the reasons for the traffic calming.
- Harp Hill is a relatively steep Cheltenham road and cars do speed going both down and up the Hill. This is very dangerous given the narrowness of the road, the road curves, and the inadequate road lighting. There are no pavements or road paths towards the top of the Hill. Given that the road is narrow, resident parking is a problem and it does cause problems.
- In Autumn and wintertime, the morning sun is in line with the road. It is impossible to drive up the Hill without being blinded even if there is no screen condensation. I do recall a neighbour's car, being parked half on road and half on pavement. It was shunted into a lamppost by a rear collision of a car driving up the Hill. The driver said, "I was blinded ...".
- In wintertime Harp Hill can become very icy and slippery and there have been many accidents including an overturned car that came down too fast. It stopped not too far before the Battledown Centre. Going the other way, cars can struggle to get up the road and I have watched with incredulity as cars have taken faster and faster run ups until they get to the top of the Hill. Cars are often abandoned when conditions are bad.
- Over the years Greenway Lane joining onto Harp Hill has become more and more of a rat run as people take a shortcut between Charlton Kings and the Prestbury / Bishops Cleeve side of Cheltenham. The traffic varies with work hours. The effect of

Page 201

another 700+ cars is of grave concern. There has also been another recent (but much smaller) development just above Harp Hill which has already significantly added to the traffic.

- Bats. We regularly / most evenings see bats flying around our garden and recently we experienced a small cauldron (swarm) of bats around Oakley Farm. There were some onlookers with phones out.

Cleeve View
Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PX

Comments: 6th March 2021

I am extremely concerned about the access off Harp Hill. This is a very busy road already, with residents increasingly concerned at the speed in which cars travel in both directions up and down the hill. Harp Hill is used as a cut through, and is a bottleneck in the mornings when trying to get out at the bottom of the road. Furthermore, residents park their cars along the road which limits it in parts to one way, which again create backlogs. I have witnessed several instances of children almost being hit by cars travelling too fast. There is also a centre for children at the bottom of the hill, which means an increase to the number of cars using Harp Hill during drop off and pick up times.

I note the proposal for 250 new homes. As a conservative estimate, this will result in 250 more cars using Harp Hill to access the properties. This is a dangerous proposition, and one that, I fear, will result in fatalities. It is not feasible to allow this construction when the proposed access into the new estate is ill equipped to deal with the number of cars currently using the road, let alone the additional vehicular usage once the new estate has been built.

I therefore strongly object to the proposition, and ask that the application is rejected.

Southfield
Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PX

Comments: 28th July 2020

We wish to object, in the strongest possible terms, to the proposed development of up to 250 residential dwellings at Oakley Farm.

We understand that, at this time, we are being asked to comment solely on the means of access from Harp Hill, not on the actual development itself. However, it seems impossible and unreasonable to separate the two matters: if access is approved, the

chances of the site then being rejected are close to zero. As such, we will address both matters.

The most obvious reason to object to the development is because of its location. There is no point in designating land as AONB if it can be developed, at will, by companies for private gain. This, in itself, should be sufficient to stop the development and it is surprising to us that the project is even being considered. This is particularly so given the Cheltenham Plan (adopted very recently, in July 2020) which states that the Council "...is concerned at the cumulative effect of even small-scale development and of development in new locations within the AONB". The Council should be guided by this concern and bring the proposal (which can hardly be described as small-scale) to an immediate stop.

Furthermore, according to SD7 of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy, "All development proposals in or within the setting of the Cotswolds AONB will be required to conserve and, where appropriate, enhance its landscape, scenic beauty, wildlife, cultural heritage and other special qualities". It is difficult to see how the proposal at Oakley Farm meets any of these requirements. On the contrary, the proposed development would devastate the landscape, scenic beauty and wildlife of the local area. Covid-19 has shown that the existence of green spaces, wildlife, and the natural habitat in general, has been essential to the physical and mental health being of the population; to give away such areas now would be extremely short-sighted.

In terms of access, Harp Hill is wholly unsuitable. Other respondents have provided numerous reasons as to why this is so, but to summarise:

- The road is very narrow at two points (just outside the Battledown Centre for Children & Families, and also just before the junction with Stanley Road) and already dangerous in those locations. The additional traffic brought about by the proposed development would make accidents inevitable.
- The double mini-roundabout system at the bottom of Harp Hill is poorly designed, again dangerous (as it does not afford a good view of traffic coming from Sainsburys) and simply could not cope with the additional volume of traffic.
- Harp Hill is regularly used as a place for individuals to race/test/enjoy their vehicles. The speed (and associated noise - day and night) of some motorists using the hill is reckless and astonishing. The road is therefore already dangerous at times, and will become more so with additional traffic.
- Houses on Harp Hill already suffer from vibration from traffic using the hill. This will inevitably get much worse during construction of the development, and after it has been completed (due to increased deliveries etc). If the development is approved, and access is from Harp Hill, existing residents can expect real disturbance, and actual damage to their properties.
- The junction with Greenway Lane, which will inevitably receive much more traffic, is already extremely tight and, again, dangerous. It could not cope with additional traffic.
- Pedestrians would be put in danger due to increased traffic given that there are sections of Harp Hill with no, or insufficient, pavements.

Page 203

- The road surface has been significantly degraded by increased use - this will inevitably get worse. We note that the council has just started to repair the road; even if new tarmac is laid, and remains in a good condition for several years, all other points remain.

All-in-all, access to the project via Harp Hill risks real danger to health and property.

If the council needs to increase its housing stock (which seems debatable - given that, according to Table 1 on p47 of the Cheltenham Plan, the supply of houses for the period 2011 - 2031 already exceeds the objectively assessed need) , it must look to areas which are less dangerous and which do not result in the destruction of the environment.

The New House
Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PX

Comments: 29th July 2020

My husband and I have lived on Harp Hill for more than 30 years and year on year we have seen an increase in traffic some of which is totally unsuitable for the road in it's present condition.

Harp Hill is poorly maintained and pot holes appear frequently. They are patched up periodically. The road surface cannot take more traffic especially at busy times of day. It is dangerous and I am surprised that a serious accident has not happened.

Baring this in mind.....

We strongly object to access for 250 new houses on the Oakley Farm site to be on Harp Hill. It is a beautiful area used by many for recreational purposes and this proposal would spoil our environment for generations to come.

It would be totally inappropriate to consider this as a suitable site for development.

Sudeley
Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PX

Comments: 31st July 2020

I am writing with the following comments as an OBJECTION to the application reference 20/01069/OUT.

It is inconceivable that an application would be allowed in any area that had already been identified as AONB. Once done it cannot be undone. The impact on the local flora and

fauna is irreversible, and the damage to the broader appeal of Cheltenham as the centre of the Cotswolds as more development is allowed on their very foothills.

As a resident of Harp Hill I witness on a daily basis the level of traffic that already uses Harp Hill and the dangerous consequences from a Health and Safety perspective that would result from any increase in traffic flow.

As someone who regularly walks and cycles up Harp Hill the level of speeding (in general in excess of the speed limit, and often significantly more so) is dangerous and will result in a fatality if something is not done about it. The increasing number of journeys will only increase the traffic volumes and make it more dangerous for pedestrians, cyclists and motorists.

The road itself can also not sustain an increased volume of traffic - it is already disintegrating, and I fear that increased traffic, especially heavy traffic, will have consequences for the state of existing houses up Harp Hill.

The road and surrounding area already suffer from flooding following heavy rain, and further building on green land will further exacerbate the issue for existing residents in the area.

There is also the significant issue of lack of facilities in the local area (and across Cheltenham) to support this number of houses. There are insufficient school spaces, and the area of proposed development does not currently fall within any secondary school catchment for schools located nearby.

Please take all these points as an OBJECTION to application

Kings Welcome
Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PR

Comments: 30th July 2020

I wish to strongly OBJECT to this proposal on the following grounds:

1. It is AONB and protected, plus it's full of wildlife whose habitat would be destroyed if this is allowed. It is enjoyed by lots of people walking round to Greenway Lane and Aggs Hill whose pleasure is obvious.
2. The road is over-used now and a common rat run between sixways and the complex multiple junction where the Hill meets Hales, Priors and Hewlett Roads and the congestion and pollution are already more than is acceptable.
3. The thought of a further 500 cars (most houses have 2 cars,) coming out onto the narrow part of the hill where there are no paths, verges or drains is frightening and will fast become an accident black spot.

Please will Planning take these comments into serious consideration.

Rose Orchard
Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PR

Comments: 3rd August 2020

I am objecting to the proposal 20/01069OUT.

On the following grounds, this is not an exhaustive list but just some of the main issues.

1. ANOB is covered by the Rights of Way Act 2000 section 85. The NPPF has a stringent regulatory framework that affords the highest level of protection for ANOB areas, consequently this application in its entirety must be refused. This large opportunistic non-plan led site does not enhance the countryside and is demonstratively unsustainable, however you consider it.
2. Traffic volumes on Harp Hill are already significantly too high, and most traffic exceeds the 30 MPH limit. Predominantly due to a "rat run" from Six Ways to Hewlett Road /Hales Road junction.
3. Pedestrian and active travel is discouraged as footpaths are non-existent the road is also narrow, and in a dreadful condition along most of its length. The only option is to walk on the road .

It may be a sensible safety option to close Greenway Lane at some point along its length with a barrier allowing only walkers and cyclists to pass through. Air quality would also naturally improve significantly if this measure were carried out.

Turnpike House
Greenway Lane
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PW

Comments: 9th September 2020

I strongly object to this proposal which is ultimately for 250 houses in an area of ANOB, thinly disguised as just being an access road onto Harp Hill.

There are so many reasons why this is wrong:

It's not in the Cheltenham plan for development so should not be considered
It's ANOB and therefore should have the highest level of protection in the land
Harp Hill is unsuited to further traffic and is already dangerous on the bends
The road surface is unstable and hard to maintain (sand based I believe)
The Greenway Lane / Harp Hill route is already a rat run
There's no public transport / other infrastructure available
The amenity views for walkers will be scarred for ever
The damage to wildlife habitats will be immense
This land is not designated for housing

Please do the right thing and reject this proposal which does not meet any criteria you have ever set or which central government has set for acceptable development.

21 Copt Elm Close
Charlton Kings
Cheltenham
Gloucestershire
GL53 8AE

Comments: 18th March 2021

I am horrified to see that 250 houses are about to be built in an area of outstanding natural beauty. My children and I walk around Harp Hill frequently and already the traffic is bad but we still enjoy seeing deer and lovely birds. Surely there are other sites that can be redeveloped without raping our beautiful landscape and depriving the next generation of the joy and ecological benefits that it brings.

Planning department, please remember why you do this job (I hope!). Don't let money talk louder than common sense.

13 Little Herberts Road
Charlton Kings
Cheltenham
Gloucestershire
GL53 8LX

Comments: 25th July 2020

My family and I often see such beautiful wildlife in these fields. From Deer to Badgers, the flora and fauna need to be protected. The roads are already congested, especially during peak commuter & school times. Increasing residential properties will have a detrimental effect and pose serious dangers to pedestrians due to the increase rate of traffic.

87 Ryeworth Road
Charlton Kings
Cheltenham
Gloucestershire
GL52 6LS

Comments: 25th March 2021

- AONB
- Traffic cutting across Harp Hill/Mill Lane/Ryeworth Rd to get to A40
- Flood risk
- Too many other reasons to list!!

164 Hewlett Road
Cheltenham
Gloucestershire
GL52 6TT

Comments: 28th July 2020

I strongly object to this proposal.

This application for an access road can only be justified in exceptional circumstances. On reviewing these documents, this company has not identified very special circumstances for this Access road and development to proceed.

Secondly, the Report on the Examination of the Cheltenham Plan 2011-2031, dated 17 March 2020, items 58-59 references a small scale development of 25 dwellings which 'would considerably reduce the potential for the harmful impacts which were identified in the appeal scheme'. Where did a modest development of up to 25 houses jump to 250? Even 25 is not acceptable.

I urge the council to refuse this development.

80a Cheltenham Road
Longlevens
Gloucester
GL2 0lx

Comments: 28th July 2020

I object to the development of this land due to the damage that will be caused to the natural environment and beauty of this area. This is an area we regularly walk our dogs and regularly see a wild variety of beautiful wildlife. This Development will also cause a massive increase in traffic on already busy roads, adding time to travel into and out of cheltenham.

50 Ratcliff Lawns
Southam
GL52 3NT

Comments: 29th July 2020

I travel from Southam via Harp Hill to Charlton Kings on a daily basis.

Reasons for my objection:

1. The entrance/exit on Harp Hill would cause horrendous traffic problems both at the Harp Hill/ Greenway Lane junction (already a traffic black spot) and at the bottom at the junction of Priors Road/Hales Road. Both these junctions are really busy with nose-to-tail commuter traffic mornings and evenings with traffic coming from Prestbury and Cleeve Hill into and out of Cheltenham town centre.
2. Harp Hill was originally a country road. It is not built to cope with large numbers of cars, lorries and deliveries that would be entering and exiting the proposed development. The top of Harp Hill where the proposed entrance to the estate would be has no footpaths. The bottom of Harp Hill where there are terraced houses (with no garages or driveways) already has many cars parked on the road.
3. This farmland is part of the lower escarpment slopes of the Cotswold AONB.

4. A significant number of homes have already been built on the old GCHQ Oakley site behind Sainsbury's in the last 10 years and an additional 250 homes is totally inappropriate for the area.

Please consider my objection.

20 Calspick Way
Longlevens
Gloucester
GL2 0XA

Comments: 29th July 2020

I'm writing to register my opposition to an application by Robert Hitchens limited time build houses on Oakley Farm in Cheltenham. As the local residents have pointed out, what is the point of designating an area as AONB if developers can lodge an application to build on it?

Too often now profit and the economy is put before nature and wildlife. I realise we need more housing but it can't be at the expense of the things that actually make life worth living and are so important for our wellbeing and mental health.

I would appreciate your thoughts on this subject.

18 The Grove
Hales Road
Cheltenham
Gloucestershire
GL52 6SX

Comments: 29th July 2020

I am a local resident of the area and I object very strongly to the proposed development. It is wrong, in principal, to allow house building in an AONB.

It will increase the amount of traffic on Hales road, which is already in normal times very difficult to cross.

17 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 29th July 2020

Too much traffic and area of outstanding natural beauty

23 Priors Road
Cheltenham
Gloucestershire
GL52 5AB

Comments: 31st July 2020

Objection on the grounds that you will ruin an area of countryside in town which is habitat to herds of deer, sheep, pheasants.

Also the number of cars will increase considerably on Harp Hill, causing gridlock and on Priors Road which is busy already.

Comments: 31st July 2020

We wish to object to the recent planning application at Oakley Farm Pastures.

You are ruining the only countryside we have in town in this area and the increased amount of traffic in the surrounding roads will be a nightmare.

Comments: 15th December 2020

We wish to strongly object to the above planning application.

This is an area of Outstanding Natural Beauty. There are many animals which inhabit the area, including several families of deer. This area needs to be protected for our grandchildren and not built on.

The impact on the local area would be immense. At present cars speed up and down Harp Hill. If you add more cars coming into Harp Hill from Oakley Farm then it will be utter chaos and dangerous.

Please understand our objections.

Jalna
14D Copt Elm Close
Charlton Kings Cheltenham
Gloucestershire
GL53 8AD

Comments: 2nd August 2020

If this application gets planning permission, then there is something seriously wrong within the Boroughs decision makers when it comes to planning. This is all about making / maximising money / profit from one of the last beautiful areas of Cheltenham which should be protected. There is lots of land in and around Cheltenham that would be more suitable for houses.

This is an area of AONB with lots of different wild life and it will be destroyed by this development.

We should set up a fund and prepare to fight this wrong doing if it gets approved.

We will need to have it challenged by a Judicial Review.

I know solicitors who specialise in this field and have an excellent success rate.

Comments: 3rd August 2020

This is all about making / maximising money / profit from one of the last beautiful areas of Cheltenham which should be protected. There is lots of land in and around Cheltenham that would be more suitable for houses.

This is an area of AONB with lots of different wild life and it will be destroyed by this development.

Beechwood
Ashley Road
Cheltenham
Gloucestershire
GL52 6PG

Comments: 3rd August 2020

I strongly object to this proposed development on several grounds.

Firstly, this land is as an Area of Outstanding Natural Beauty which means that it has been designated for conservation due to its significant landscape value. If such an area cannot be protected from residential development, what has this country come to.

Secondly, as a former resident of Harp Hill and living just off it now, I know only too well how dangerous that road can be. When I lived there, the volume of traffic at peak times made it difficult to turn out of my drive and also the speed of the traffic could be a problem. The road is steep, very narrow in places and the surface frequently degenerates into potholes. I actually stopped using the road for a time last year as I was frequently meeting speeding heavy construction lorries on one particularly narrow part.

Thirdly, with the volume of recent development on the old GCHQ site, the area's infrastructure is overloaded. The nearest GP surgery has recently moved from Prestbury to Bishops Cleeve and has not been replaced and the local schools are oversubscribed. The surrounding roads have become much more congested in peak times and the Harp Hill/ Hales Road and Greenway Lane/ London Road junctions will become even more problematical if this development goes ahead. Numerous walkers and cyclists also use Harp Hill for access to Cleeve Hill and the Cotswold Way and the resulting increased traffic and pollution would put their health, and possibly lives, at risk.

29 Slad Way
Cheltenham
Gloucestershire
GL52 5FA

Comments: 5th August 2020

I object to the proposal.

As a mother living in the area, I am already aware of the huge pressure on primary school places in this area. There is not the infrastructure to support another potential 250 families.

27 Pillowell Close
Cheltenham
Gloucestershire
GL52 5GJ

Comments: 5th August 2020

At the moment parking and traffic conditions are already problematic on our estate so any developments which might eventually lead to access onto our estate in the long term will have an adverse effect on parking, noise, pollution. Parking is also at a premium on the existing estate and if this means that there is a change in the long term with a through road, this will only make the issue worse. There already is a high population density already on this estate only with the many developments and therefore it is bearable because there is a bit of green land to the side.

With the addition of another 250 houses there will be visual impact on the area and there will be additional noise from 250 Dwellings.

60 Fairford Road
Cheltenham
Gloucestershire
GL52 5FQ

Comments: 9th August 2020

We cannot destroy another AONB! Cheltenham doesn't have the infrastructure or resources ie schools, hospital space etc to support another 250 houses. Make right what is already here.

20 Hales Close
Cheltenham
Gloucestershire
GL52 6TF

Comments: 14th August 2020

Objection to planning application

This location is a pristine AONB greenfield site so no permission for any building development of any type should be issued for this location. It is inherently unsustainable as a development too, for the reasons outlined below.

The definition of an AONB is land protected by the Countryside and Rights of Way Act 2000 (CROW Act). It protects the land to conserve and enhance its natural beauty.

Under the CROW Act, you, Cheltenham Borough Council, MUST make sure that all decisions have regard for the purpose of CONSERVING and ENHANCING the natural beauty of the AONB.

1 - AONB.

How does building 250 houses possibly conserve or enhance the AONB? We would challenge CBC to provide one way in which this planning application fits this criteria.

2 - The Cheltenham Local Plan, just published and adopted by CBC Councillors after years of debate, EXCLUDES this specific area from future housing development. It would be hypocritical & corrupt for any planning permission now to be granted. And would set a dangerous precedent.

3 - Traffic.

Unacceptable, additional pressure will be placed on Harp Hill both at the Hewlett Road mini roundabout but also at the Sixways junction in Charlton Kings. Greenway Lane and Harp Hill are now rat runs.

Traffic density will be a disaster with pollution spilling into our streets. Likelihoods of accidents will rise as a result. Worsening air pollution levels will negatively impact on the health of residents in Battledown, Oakley and Whaddon.

Harp Hill, Hewlett Road, Bouncers Lane, Prestbury, Sixways, & Priors Road will all become worse pollution hot spots than they already are. None of these roads were designed for such overuse - an additional 500+ cars!

Greenway Lane is narrow & un-kerbed. Walkers, cyclists & horse riders already have cars whizzing by - an accident waiting to happen! When there is a cricket match the congestion is even worse. I find walking and cycling up there now pretty hair raising and unpleasant. It wasn't always this way - during lockdown it was amazingly quiet with lots more braving Harp Hill and Greenway Lane to walk and cycle. I thought this is what the Government is promoting - active travel to help combat obesity? For that we need developments that are people, not car centred. Do we really want to turn the clock back? Because that's absolutely what this development will do.

How is this development helping to encourage sustainable mobility and active travel and therefore better health outcomes, which are national and local priorities? It is not. It is not on a bus route. It's halfway up a steep hill - who wants to carry shopping or cycle up a steep hill, let alone one that's scary to travel up/down if you're on foot/on a bike? Sustainable developments are supposed to be designed to discourage car use as the default option. One of the many reasons this development is inherently unsustainable.

Access - the proposed access directly onto Harp Hill is simply stupid and dangerous! It too is an accident waiting to happen.

4 - Wildlife & Nature.

Increased noise WILL be a problem. Air quality WILL be a problem. The fields currently help mitigate all of these things.

There WILL be destruction of irreplaceable wildlife habitats and removal of hedgerows/trees where an abundance of birds/deer/foxes/badgers/owls and bats and other all live & visit because this is an AONB. The fields provide habitat corridors for species propping up our local biodiversity. Our wildlife needs corridors.

Wildlife WILL be hugely affected. The deer population is thriving and we often see deer in the fields and crossing the roads.

Has a natural capital assessment been conducted of this site - the ecological services (not to mention recreation value) it provides? It's a green lung for Battledown, Whaddon and Oakley estates.

Rain already floods down the hill & the Hales Road roundabouts already flood regularly. Building on these fields WILL create more flooding problems - how can it not? Our home has been flooded because the sewage system collapsed under the vast amount of water during an extreme downpour. Events like this will become more frequent.

Protection against future extreme weather events. During this recent hot spell it helped protect us from urban heat island intensity. When we get torrential rain, it acts as a soak away, preventing the bottom (Hewlett Road and Priors Rd in particular) from flooding more than they already do. How is this development going to help future proof existing local housing from extreme weather events? It is not. It is going to do the opposite by undermining what resilience we already have.

5 - Infrastructure.

There WILL be a hugely increased requirement for schools/doctors and local amenities - current secondary schools, dentists' and doctors' surgeries are currently stretched.

6 - Brown field sites - use these first!

Post Covid, many companies will change their working practices & more brownfield sites will become available. Developers should be required to develop these sites - not take our irreplaceable green fields!

This is quite simply a case of money over preservation - profit for developers!

Whilst we accept the need for new housing - why should this be at the expense of our AONB when other alternatives are available! If AONB isn't protected, then how will others be. And if that happens, what's the point of an AONB designation? And if inherently unsustainable developments like this get the green light, what's the point of anything else the Council does to say it's playing its part in helping build a sustainable world? Because this development will lock in carbon, emissions, pollution, risk, poorer health outcomes, lost biodiversity, congestion (losing our local economy even more money) for a generation. Come on CBC - think holistically and long term about this, beyond damage limitation to something that's actually restorative. We need you to!

29 Fairford Road
Cheltenham
Gloucestershire
GL52 5FN

Comments: 12th December 2020

We use the route in Harp Hill on a daily basis, it's busy enough as it's already, putting 250 more housing there would only make the matter worse. There are a lot of local people walking their dogs or just exercising on that route, having more traffic on such a minor road would cause more potential danger to the locals.

In the meantime, we need to preserve the nature there which is very important for the locals.

Hence we do not support this development.

33 Clearwell Gardens
Cheltenham
Gloucestershire
GL52 5GH

Comments: 22nd December 2020

My house has sight of part of the proposed development site, comprising a field within the Cotswold Area of Outstanding Natural Beauty. At present I can see sheep in the field, a large oak tree and occasionally there are Ravens or Buzzards in the vicinity. At night I sometimes hear a Tawney Owl calling. I find it very distressing that this 'patch of countryside' will go. This AONB should have the highest level of protection (equivalent to a National Park) from development.

I object to this development on the grounds that this area should have full protection as an AONB. There are also serious concerns over inappropriate access from Harp Hill as well as issues regarding the risk of flooding and the strain on infrastructure including schools and health services.

I trust this planning application will be rejected.

95 Fairford Road
Cheltenham
Gloucestershire
GL52 5FN

Comments: 12th January 2021

I am concerned and saddened having read about the prospective development of a much loved and extremely important AONB located on Harp Hill. There should be no question as to the outcome of this application, the individuals within the council involved in this process need to be aware of the wider impact the development of this site may have on wildlife and the other residents that call this area home. I heavily object to this application for a number of reasons, the inevitable increase in traffic poses somewhat of a danger to the residents and others that regularly use Harp Hill as a thoroughfare or as permanent parking. It is already a hazardous road to walk/drive down with large parts that do not even have pavements. The environmental effect of redeveloping an open space that helps to prevent flooding in the area is a disaster waiting to happen for residents that reside on lower ground. I along with many other ask that the council act now and reject any further action regarding this application, there is nothing good to come from this development

24 Jersey Avenue
Cheltenham
Gloucestershire
GL52 2SZ

Comments: 15th January 2021

Good Afternoon,

I would like to add my voice of opposition to the development of Oakley Farm. The land is an AONB and provides a green space between the housing development by Sainsbury's and Harp Hill.

Further development would not only impact the beauty of the local area it would also have a massive impact on traffic around Harp Hill.

You will be well aware of the arguments for and against a development so I will not list them all here.

1 Highbury Mews
Priory Street
Cheltenham
Gloucestershire
GL52 6EL

Comments: 20th July 2020

Too much development in that area already

2 East Court Mews
London Road
Charlton Kings Cheltenham
Gloucestershire
GL52 6UN

Comments: 21st July 2020

Whilst there are many conservation reasons why not to develop this site, i would also like to object on the grounds that Cheltenham simply doesn't have the infrastructure or services to support such a large development. Primary schools do not have spare capacity, doctors surgeries do not have spare capacity and the roads in the area already grind to a halt during school and commuting hours. Such a large development is placing yet more strain on these aspects of life. The complete picture of infrastructure needs to be considered with such a large development.

70 Little Herberts Road
Charlton Kings
Cheltenham
Gloucestershire
GL53 8LN

Comments: 6th April 2021

I wish to object to the planned development. The very beauty of the suuounding area is what attracts people to Cheltenham and this is being steadily eroded by developements such as this.

1. These fields are a hugely important site , part of the Cotswold AONB
2. Views across town from the nearby hills will be adversely affected.
3. Local roads will be unable unable to cope with the extra traffic.

4. Schools and local shops do not have the capacity to cope with the number of dwellings planned.
5. There will be a significant effect on local wildlife.
6. By going directly to appeal the concerns of local people, local democracy, will not be taken into consideration.

64 Little Herberts Road
Charlton Kings
Cheltenham
Gloucestershire
GL53 8LN

Comments: 6th April 2021

This is an area of ANOB and as such should be kept as such. I strongly object to this planning application on grounds of increased traffic, congestion, safety issues and damage to wildlife habitats.

6 Cleeve Cloud Lane
Cheltenham
Gloucestershire
GL52 5SE

Comments: 23rd July 2020

This area is a boundary to the AONB and is vital to the wildlife that uses it for its habitat. The damaging works that would be required to provide access and infrastructure are far in excess of the gains for housing. There has to be a limit to the amount of green belt consigned to development and wealthy developers need to be governed and kept in check. If this site were to go the overall impression would be that the local council care more about gaining income from unscrupulous developers than the will of the people and the environment they all pretend to care about so much.

Gray House
Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PR

Comments: 27th July 2020

As residents of Harp Hill I write to object strongly to this application for 250 houses with access via Harp Hill.

This is AONB land and is protected so should definitely not be developed. The pastures support deer, badgers birds of prey etc.

The idea of noticeably more than 400 cars (most houses have 2 vehicles) joining the current rush hour situation on the Hill and at the junction of Hales, Hewlett and Priors roads is horrendous. There is no bus service here and the Hill is still basically a narrow country lane with no paths or drains, but a very tight and dangerous corner onto

Greenway Lane, and a steep slope down to the multiple roundabouts at the bottom of the hill where terraced houses have to park their cars on the road. Cars already exceed the 30mph speed limit where we have had 2 cats killed and a car written off.

Any further traffic would totally destroy an AONB area enjoyed by walkers, dog walkers and horse riders as they proceed to Greenway Lane where recently 3 applications were refused on AONB land citing the "need to protect the important areas"; also referring to the Oakley Pastures.

The other factor is that when the site at the rear of GCHQ was mooted, Planning restricted the number of houses allowed to 40 due to "the unsuitability of the Hill to take any further traffic" so even then the road was at maximum capacity, so I fail to see how a further 250 houses can be considered with the amount of cars that would incur.

We trust the Planning Department will take these factors into very serious consideration and refuse this application.

28 Charlton Park Drive
Cheltenham
Gloucestershire
GL53 7RX

Comments: 27th July 2020

I strongly object to this housing development. As an AONB it is and should remain protected from developments such as this that will destroy ecosystems, wildlife and natural habitat, and add no value or beauty to the area. I say this as a young, private renter who does want to buy a house in the future; but I believe there is no justification for destroying natural beauty and wildlife habitats just to build some houses. Please note my strongest possible objection to this plan.

28 Charlton Park Drive
Cheltenham
Gloucestershire
GL53 7RX

Comments: 27th July 2020

I could mention countless reasons why this shouldn't go ahead, but the only one I need to refer to is this:

It's an "Area of Outstanding Natural Beauty", and should be kept as such, therefore this application shouldn't even be entertained. Denied, move on.

Shame on Robert Hitchins Ltd for starting this application.

Highcroft
Oakley Road
Cheltenham
Gloucestershire
GL52 6NZ

Comments: 29th July 2020

I strongly object to this proposed application for such residential development in an area of outstanding natural beauty . This is a sensitive site and not suitable for building on and the associated loss of protected pastures of local significance. To allow the proposed development would involve the loss forever of cherished local countryside with forced relocation of wildlife . It would also increase pressure on the local amenities, in particular the road and footpath networks with an attendant increased risk to the environment and to health and safety . In addition, any planning permission would create an unacceptable precedent for further housing development on the Cotswold Escarpment.

Chestnut House
Ashley Road
Cheltenham
Gloucestershire
GL52 6PH

Comments: 29th July 2020

With so many other planned developments around Cheltenham why do you need to build on an ANOB? Harp hill is already a dangerous, narrow and poorly maintained road it will not cope with cars from another 250 dwellings. The roundabout at Hewlett Road is already a morning bottleneck, traffic will back up the hill in the morning or have to traverse the chicane on Greenway Lane. The Six Ways junction is also a bottleneck due to St Edwards junior school traffic so with Hales Road blocked from Holy Apostles school and London Road lights backed up, we will have no route off the estate in the morning. Please think again. Thank you.

9 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 29th July 2020

I object to this application in relation to the increased traffic levels that this application would create on harp hill and greenway lane which is currently to high. The roads around this area were not designed for the current volume of traffic and to add an additional 250 homes would be disastrous.

164 Hewlett Road
Cheltenham
Gloucestershire
GL52 6TT

Comments: 30th July 2020

I strongly object to the proposal of the building of 250 houses on Oakley Rise. The state of the neighbouring roads that would be used to support heavy vehicles to this access road, would cause more vibration to my property and the substandard road surface would not support this increase. I also do not believe Harp Hill road is designed to take heavy goods vehicles.

Surface water run off at the junction of Hewlett Road and Pittville Circus at the bottom of this hill, would be exasperated with more drainage from new housing running into an already creaking system.

None of these reports reflect the wider damage to the local neighbourhood from a substantial development, and for this reason I object to this proposal.

Southern Lawn
Ashley Road
Cheltenham
Gloucestershire
GL52 6NU

Comments: 1st August 2020

Cheltenham is gloriously located, nestled at the foot of the Cotswold escarpment. This is our greatest long term asset - our wonderful setting. Right now, 2020, retail is facing its greatest challenge and a major realignment of how to use our town centres is barely started. John Lewis, for example, just yesterday announced a review of its UK retail space with upper stories to be considered for residential living.

So Cheltenham as a shopping centre is under threat. But Cheltenham for tourism, for staycations, for living, is not. Our beautiful location should be protected for many reasons, including the long term commercial interests of the town.

*Specific planning objections are: Negative effect upon amenity. Visual impact on landscape and damage to character and appearance of the Conservation area visible from the town and numerous public rights of way.

The extra traffic created by this development would have only two ways out, and both appear to be at capacity at certain times of day (as measured by a normal citizen observing long queues).

We frequently walk on Harp Hill and it is unpleasant and sometimes frightening, due to the constant traffic. I suggest some of the counsellors walk up (or down!) Harp Hill a few times at different times of day and make their own assessment.

Highways reports tell only a 2-dimensional story, but people are 3 dimensional!

*Specific planning objection is: Highway safety. Nuisance from additional traffic.

The loss of visual amenity would be massive - who wants to raise their eyes to the hills and see another dense mass of modern housing? Who wants to look from the top of Cleeve Hill and see housing instead of ancient pastures creep up the hill towards them? Who want to live in a sprawling conurbation, where even getting up to Cleeve Hill and the Cotswold Way is a fume-drenched crawl along Greenway Lane or up Harp Hill?

*Specific planning objections are: Loss of visual amenity and disturbance to wildlife.

Much of the visible slope of the escarpment is justifiably protected by being designated as AONB, and what local person really wants to see that protection eroded by allowing this development?

*Specific planning objection: Approval would set a precedent undermining the security of all protected locations.

And thank you to our Officers and Councillors for all the hard work that we know goes into dealing with these speculative applications! It is recognized and appreciated.

112 Hales Road
Cheltenham
Gloucestershire
GL52 6SU

Comments: 1st August 2020

I would like to object to the above planning application at Oakley Farm.

I feel this would cause an increase in traffic and cause extra pollution to local residents. Also it is an Area Of Outstanding Beauty and would scar the landscape around Cheltenham for many.

There has already been a huge amount of building in recent years i.e. in Bishops Cleeve which is near enough to affect Cheltenham.

I think this building proposal would affect the health of local residents who already have extra traffic due to Sainsburys being nearby.

There has been a lot of interest especially in very recent years and since the Covid 19 pandemic, in making the environment greener, more cycling and pedestrian friendly and this won't happen if building continues to be allowed on green sites.

4 Beechwood Close
Cheltenham
Gloucestershire
GL52 6QQ

Comments: 4th August 2020

If access to the development is by means of Harp Hill this will put unacceptable pressure on Harp Hill particularly at the Hewlett Rod mini roundabout but also the road itself which is not wide. The same applies to Greenway Lane particularly the volume of traffic at the Six Ways junction the approach to which is narrow and at times fraught in part because of the permitted roadside parking close to the Six Ways traffic lights.

If access were to be via the old Oakley Farm lane (which would require resurfacing) exiting on to Priors Road or through the existing development this may be more acceptable but also not without its drawbacks..

May House
Oakley Road
Cheltenham
Gloucestershire
GL52 6PA

Comments: 6th August 2020

I object to this proposed development for the following reasons:

The proposed development is on an area of outstanding natural beauty. AONB are recognised for their importance to the environment and should be protected in their entirety.

This area is not listed in the local plan for development.

The development of 250 houses would generate an unacceptable increase in vehicular traffic onto a small road. Both the volume and speed of this traffic would make the road even more dangerous for the numerous pedestrians and cyclists that also use it. I regularly walk my dog along Harp Hill and have first hand experience of dangerous and fast driving on this road.

The proposed access road will create a black spot for collisions, with poor sight lines in both directions and pressure to access Harp Hill by the large volume of traffic.

The development would destroy a sanctuary for wildlife such as deer and badgers, with no surrounding areas for these animals to be displaced to.

I have taken considerable time to read a large number of the other objections and agree with all the points made in the comments as well.

23 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 6th August 2020

I strongly object to the proposal to build on this AONB. The housing nearby has already expanded significantly. The proposed access via Harp Hill would lead to significant congestion on a road that is already difficult to drive along at this time. Green belt areas are important for wildlife and resident's well being.

14 Greenway Lane
Charlton Kings
Cheltenham
Gloucestershire
GL52 6LB

Comments: 6th August 2020

I would like to strongly object to this application.

We frequently walk across the fields bordering Greenway Lane past Cromwell court, due to have eight large dwellings built on, and down harp hill into Battledown and in doing so observe rabbits, deer and birds of prey. During lockdown these daily walks were incredibly therapeutic and the benefits of exercise and green spaces is well documented. At present deer still roam the acres that comprise Cromwell Court grounds but when this is built on soon those deer will be pushed further out to the fields now proposed to be built on in this application. Trying to educate future generations about the importance of the environment, to respect it and value it is difficult when it is not valued by the current generation.

In addition to the loss of wildlife, due to construction of houses, the subsequent increase in vehicles on Harp Hill, down Greenway Lane or Mill lane will impact on wildlife causing more road kill, pollution and spoil the quiet lanes which are used by many runners, cyclists and walkers. The lanes themselves do not have the capacity to sustain another 400 cars daily.

Finally, with local primary schools already full and oversubscribed an increase in potentially another 250 families will place an additional pressure on an already stretched system.

Comments: 7th August 2020

I would like to strongly object to this application.

As a mother of two young children we frequently walk across the fields bordering Greenway Lane past Cromwell court, due to have eight large dwellings built on, and down harp hill into Battledown and in doing so observe rabbits, deer and birds of prey. During lockdown these daily walks were incredibly therapeutic and the benefits of exercise and green spaces is well documented. At present deer still roam the acres that comprise Cromwell Court grounds but when this is built on soon those deer will be pushed further out to the fields now proposed to be built on in this application. Trying to educate future generations about the importance of the environment, to respect it and value it is difficult when it is not valued by the current generation.

In addition to the loss of wildlife, due to construction of houses, the subsequent increase in vehicles on Harp Hill, down Greenway Lane or Mill lane will impact on wildlife causing more road kill, pollution and spoil the quiet lanes which are used by many runners, cyclists and walkers. The lanes themselves do not have the capacity to sustain another 400 cars daily.

Finally, with local primary schools already full and oversubscribed an increase in potentially another 250 families will place an additional pressure on an already stretched system.

28 Kempley Close
Cheltenham
Gloucestershire
GL52 5GB

Comments: 10th August 2020

I strongly object to the proposed development of 250 houses on Oakley Farm incredibly close to my home looking up to Harp Hill for the following detrimental reasons:

1. This is a designated Area of Natural Outstanding Beauty and should remain as is. The loss of this natural countryside opposite my home is very concerning.
2. The area is not in the local plan for housing development, therefore this would set a worrying precedent for further housing elsewhere.
3. The increased pollution as a result of the new road and traffic.
4. Traffic itself and safety is an issue for pedestrians (especially children) and cyclists.
5. Speeding is already a proven issue around Harp Hill which is also dangerous.
6. The habitat of wildlife. From my windows, my family and I frequently observe numerous deer grazing in the pastures very close to our home during the morning and evenings. We have seen many different species including badgers, bats and foxes to name a few.
7. Views, this was a contributory factor when buying my home 6 years ago when I understood this AONB could not be developed on due to points 1 and 2 above.
8. Schooling, there are already existing issues being in 'no man's land' with regard to catchments in this area. This will only increase the load trying to qualify for a local walkable Infant, Junior or Senior school.
9. The noise, mess and resultant dust during development which could impact mental well-being - particularly during these difficult covid times when employees are working from home long term.
10. Flooding, there is already an existing problem at the bottom of Harp Hill, Priors and Hales Road, the drains are blocked and inadequate as it is, so will be compounded.

Wadleys Farm
Ham Road
Charlton Kings
Cheltenham
Gloucestershire
GL52 6NJ

Comments: 14th August 2020
Letter attached.

39 Ladysmith Road
Cheltenham
Gloucestershire
GL52 5LH

Comments: 18th August 2020

I am writing in reference to the above proposed development in the Oakley Farm AONB.

I staunchly oppose the use of this land for more homes.

This area has been used more and more during local lock down and has preserved the mental health and well-being of many local people during the recent lockdown.

Since lockdown it has been widely publicised how getting outside is mandatory for health and well-being and should be continued even when we are back to 'normal' .

The Prime Minister is all for encouraging a reduction in weight and obesity, and building on this wonderful piece of land is taking the ability to exercise in the fresh and country air from 1000's of people that live in Cheltenham.

I have suffered from depression for many years, and having that space to go to, walk, exercise or sit in peace , has saved me from doing something stupid on more than once occasion. On a personal note, losing this wildlife haven would devastate me.

The roads in this area will not be able to deal with the traffic and will be adding to the pollution in the area.

Surely, lockdown has shown us we need to be Green and environmentally aware. Valuable wildlife will be destroyed for ever, just to satisfy the greed of one developer.

It must not happen for so many reasons.

I totally support Alex Chalk in his work to keep this area free of development. Let's just please keep this AONB for everyone to enjoy.

1 Hartlebury Way
Charlton Kings
Cheltenham
Gloucestershire
GL52 6YB

Comments: 27th March 2021

There are no exceptional circumstances to allow this incursion into the AONB which could lead to further developments of other areas which are just inside the boundaries of the nationally recognised AONB area.

44 Eldon Road
Cheltenham
Gloucestershire
GL52 6TU

Comments: 17th July 2020

44 Eldon Road objects to this application for development.

295 London Road
Charlton Kings
Cheltenham
Gloucestershire
GL52 6YY

Comments: 17th July 2020

Stop over-developing Cheltenham. Take your new home developments elsewhere- build on brownfield sites, not already-densely populated sites that already suffer from terrible traffic congestion and pollution, not to mention the chronic shortage of amenities when the population explodes in an area- not enough shops/ schools/ doctors/ amenities. Come on Cheltenham councillors- protect this town or it will be unrecognisable before too long.

Comments: 17th July 2020

I object entirely to this estate. Noise, pollution, worsening flooding, traffic congestion +++++, loss of AONB,
And if it does go ahead - heaven forbid- councillors please see sense for once, then make the access road from behind Sainsbury's- NOT OFF HARP HILL!!!!

6 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 23rd July 2020

Please do not grant permission for this application. Harp Hill is already a busy road, in poor condition with many pot holes and is used as a rat run at peak times to avoid the lights on the A40. The extra traffic on this road would create a dangerous area where there are many people walking and running with no pavement. It would add to the already dangerous nature of the corner turn at Harp Hill and Greenway Lane. It would be a tragedy if the Oakley Farm field was lost to this development. It is a wonderful oasis of green in an already overly developed part of Cheltenham. The wildlife has already been squeezed away by the developments at the top of Harp Hill/ Greenway Lane. We need our green spaces more than ever so please please do not go ahead with this preliminary stage and in future please throw out the whole application.

55 Eldon Road
Cheltenham
Gloucestershire
GL52 6TX

Comments: 27th July 2020

We object to the planning proposal 20/01069/OUT for the following reasons:

As the planned project involves the destruction of an Area of Natural Beauty (AONB), it should surely not be allowed to go ahead. It will greatly damage the wildlife and beauty of the area - we have regularly seen deer and a large variety of birdlife in the field.

As regular walkers and cyclists using Harp Hill, we have noticed a big increase in traffic in recent years. Speeding vehicles, narrow or non-existent pavements and a very poor road surface increasingly make walking and cycling more dangerous and off-putting. The road infrastructure around the site will simply not support this development.

The illustrative masterplan does not contain enough off-road parking. As with the Battledown Park site, the Oakley Farm site would soon become congested, impacting the visual environment and, more importantly, the safety of pedestrians and cyclists.

In heavy rains, we have noticed the flooding which occurs due to torrents of water running off the hills. This will only be exacerbated with more building and more traffic.

The exit from Harp Hill onto Prior's Road is already very congested and will only be made worse by potentially 250 extra vehicles using the road. Likewise, at the junction with Greenway Lane, visibility for vehicles is poor and the safety of pedestrians, runners and cyclists is already endangered.

If the proposed plans go ahead, more people will be put off from accessing, on foot or by bicycle, the beautiful areas of Ham and beyond. Given the current government's push to improve people's health and give more opportunities for exercise, these plans should be re-examined and, at the very least, considerably reduced in scope.

23 Mandeville Close
Longlevens
Gloucester
GL2 0EY

Comments: 30th July 2020

I would like to raise an objection to the planning proposal to build on a protected area of outstanding beauty at Oakley Farm Pastures.

Houses should never be built on this beautiful area of land and I object to the proposal.

8 Andorra Way
Churchdown
Gloucester
GL3 2BS

Comments: 4th August 2020

Subject: OBJECTION to Oakley Farm Pastures, Planning Application number 20/01069/OUT

We object to any inappropriate development on Oakley Farm Pastures.

We are very regular visitors to the area, and always drive up Harp Hill to get to our destination. We often comment on the lovely views of the Pastures themselves and across them to the escarpment. (Although we note recently that the hedges have been allowed to grow, blocking these views).

A housing estate here will impact many views from other areas of the AONB such as Cleeve Common and the Cotswold Way. A view of 250 houses will not enhance this valued landscape.

Additionally, it is our belief that the following words taken from the Cotswolds AONB Management Plan should be taken seriously. AONB's are landscapes whose distinctive character and natural beauty are so outstanding that it is in the nations interest to safeguard them.

10 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 6th August 2020

The impact of traffic on Harp Hill, Priors Road, Hewlett Road and Hales Rd will no doubt cause serious bottlenecks and congestion and also greater chances of accidents,. The 2 mini roundabouts connecting these roads are already very busy and cannot take additional traffic. This will also increase the chance of accidents.

With 250 new houses this will result in around 500 additional cars using this road as well as delivering vehicles etc. Access via Harp Hill will be a hazard on an already busy road.

Harp Hill was never intended to be a through road but is already a through road to Charlton Kings and so already there is too much much traffic on this narrow and badly kept road.

The environmental damage and air pollution will be compromised.

The wildlife and are will be seriously affected detrimentally.

There are already too many houses being built in this area.

35 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 6th August 2020

I strongly object to the development of this AONB.

It is home to many types of wildlife, and is already surrounded by other developments which will have had an impact on it.

The main issue will be the inadequate access via Harp Hill. This road is a 'rat run' for cars wishing to avoid queuing at traffic lights on London Road on their way through to Prestbury. It is narrow, busy, full of parked cars and in poor repair. Adding 250-500 extra vehicles to an already over-stretched route will affect the welfare of residents on Harp Hill and lead to frequent gridlock. This is already happening.

Many people use this route for walking, running and cycling. In our current drive for improved health and fitness, it would seem nonsensical to further pollute and crowd an already busy road.

30 Haywards Road
Charlton Kings
Cheltenham
Gloucestershire
GL52 6RH

Comments: 6th August 2020

I'm writing to register my strong objection to this speculative attempt to seek planning permission for housing on Oakley Farm Pastures slope. AONBs such as this must be protected for their wildlife and biodiversity value, for the role they play in providing resilience to the increasingly extreme effects of the climate emergency and for their cultural and recreational value to the local community. The site is totally unsuitable for a development of this size and character and other options must be explored.

Sudeley
Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PX

Comments: 6th August 2020

I am writing to you to object to the proposed building of 250 houses on Oakley farm pastures.

I am a primary school student who lives on Harp Hill and I believe that the proposed houses will have an extremely negative effect on the surrounding area.

The reasons to this are stated below:

The main one of which as my chief concern is the traffic.

I am already extremely worried about the traffic which is mostly due to speeding traffic and the only road safety measure is useless; I think most speeding cars ignore the flashing sign - it is almost like a target. The road is EXTREMELY DANGEROUS ALREADY!

The next reason is of school places and dentist appointments and such are quite hard to get even now, so if you build an extra 250 houses how much harder it will be for those extra households.

Wildlife.

Think how many innocent animals will be killed and even more homeless by losing their habitat. Is this the legacy we want to leave for our future generations, such as myself.

Cheltenham is supposed to be a nice, beautiful place on the edge of the Cotswolds, and destroying a large proportion of AONB does not bode well.

Eslington House
Thirlestaine Road
Cheltenham
Gloucestershire
GL53 7AS

Comments: 2nd August 2020

This application should be rejected as it does not form part of the Cheltenham development plan; it would be extremely detrimental in terms of its environmental impact on an AONB; it would harm views for a great many residents of Cheltenham encroaching upon the Cheltenham escarpment; the local roads would not cope with the additional traffic that several hundred houses would generate. Pollution would be increased and wild life, trees and habitats more generally would be adversely affected.

This is a sensitive area quite and not suitable for development of this nature.

Tor
Ashley Road
Cheltenham
Gloucestershire
GL52 6NS

Comments: 3rd August 2020

I object on the basis of increased traffic on harp hill which is not designed to take the volume of traffic the development would create, its a steep hill with lots of roadside parking which will make the road dangerous. The road is already congested at the mini roundabout at the junction of harp hill and halves road, I also object on the basis of loss of green belt, the fact that community facilities already struggle to cope.

Sudeley
Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PX

Comments: 6th August 2020

am writing to object to the proposed building of 250 houses on the site of Oakley Farm Pastures, using Harp Hill as the access.

To go ahead with this proposition would greatly increase the already astounding amount of traffic on Harp Hill, which is already a very dangerous road.

I am a secondary school student and to get to school I have to walk down and up the hill to catch my bus everyday and - although I am always aware of the vehicles that are driving past me and stay inside of the pavement - there have been multiple occasions

when I have almost been run over by speeding traffic and careless drivers not paying attention. This can make me rather worried when walking to school as I have to be on constant alert and always ready to dodge cars that are going way over the speed limit (the flashing 30 sign does absolutely nothing to slow down drivers) as the pavement is so small that cars can easily hit you when not paying attention sometimes they can even brush my school bags. Adding more houses will only worsen the amount of traffic and it will become a serious hazard parents are already wary enough as it is letting their children cross the road, perhaps for a quick trip to the post box. Secondly, Harp Hill simply cannot cope with much more traffic as the road itself is falling apart, after one particularly heavy rainfall we found that a lot of tarmac off of the road had ended up in our drive and all the drains causing awful flooding at the bottom of the road.

I am already aware of how difficult it is to get children into school, secondary especially, and adding these houses will only further the difficulty as the Harp Hill area isn't in the catchment of the nearby secondary schools meaning parents have to push to get their children at any school adding more houses will certainly increase this struggle. Another similar problem is doctor appointments, it is hard enough to get a reasonable one as it is especially with your GP, again the Oakley Farm Pastures proposal will only have a negative effect.

I was also under the impression that Cheltenham was marketed as a town situated in the middle of the Cotswolds, with plenty of green spaces. Well, how much longer will that be true if we keep building on every patch of land we can get our hands on? Oakley Farm Pastures has also been identified as AONB, do you really think you should remove a beautiful patch of land from our supposedly green town?

This huge housing development will also affect all the wildlife on Harp Hill when we are out on walks or simply in the garden you can nearly always spot some foxes or deer which mostly come from the pastures, I highly doubt this will be the same if that land is built on.

Thank you for your time and I hope you will consider my objection.

The Uplands
Stanley Road
Cheltenham
Gloucestershire
GL52 6PF

Comments: 9th August 2020

I am writing to formally object to the proposed development of Oakley Farm Pastures, Cheltenham

Please see below my main reasons for the development of the land on the lower edge of the Cotswold escarpment

1. This is an important Area of Outstanding Natural Beauty and it is of material size (c.37/38 acres). It doesn't make sense to develop this land given the obvious geological & environmental issues/consequences (e.g. flooding and removal of natural wildlife habitat, etc.) when there are better options available. Furthermore such an

action is irreversible. I wasn't aware that development was allowed on AONB and I wasn't aware that this development is in the Town or County development plans - there are many better alternatives including brownfield sites

2. The area is a rich wildlife habitat & haven - we have owls and other birds of prey which rely on this areas for food etc. The area also includes valuable indigenous trees and plants which will be destroyed and not replaced.
3. The land forms part of an important wider view/vista from many vantage points including the Cotswold Way and from many homes in Cheltenham. One of the many reasons that people live, move and visit Cheltenham is to enjoy such views. The views of the lower Cotswold escarpment slopes are being steadily eroded to the detriment of all - apart from the developers
4. There will be material wider environment impacts of this development including increased pollution which is already a very difficult issue in Cheltenham itself. as you know Cheltenham is an effective bowl and air pollution can not escape adversely impacting residents and visitors. There is a compounded impact of such a development where positive vegetation (including trees) is swapped for increased pollution associated with housing and traffic.
5. I don't understand the planning process but it does appear that the developers proposal is very high level and lacks any real detail which would allow an informed review. This seems to be a usual tactic for developers which minimises thought & effort (cost) on their part but costs the council and the community time, effort and money. The developer will then gradually drip feed its real plans over time in the hope that by attrition and persistence it will wear down the will of the council and the community. I don't like this 'one way' practice and it should be strongly discouraged because it plays into the hands of the developers with no benefit to the council or the wider community. I can't read any positive environmental proposals in the application and I can't read anything which benefits Cheltenham or the immediate local community. I see only downside for everyone other than the developer.
6. I don't know how the wider Town or County Plans are drawn up nor what plans are currently in place for the coming years. However, I do know from my own experience, and that of my family, that Cheltenham's wider infrastructure is already seriously stretched. For example, we could not get secondary school places for our two children within 3+ miles of where we lived due to over demand (this did not get resolved and remains a very difficult issue for us and for our children). We can not get an NHS dentist - months/years wait. Doctors appointments generally demand weeks or months wait. Local road (e.g. Harp Hill) are falling apart (swerving lorries, vans, etc avoiding potholes on blind bends will inevitably lead to accidents - as well as damaging cars etc). Whilst we all welcome people wanting to visit and to live in Cheltenham I can't see any commensurate growth in local services to cater for the material growth in housing. However, I can see reductions in local services. I think that there needs to be some urgent rebalancing to address this.

I would therefore be grateful if you could carefully consider this objection to the proposed development. I can see developer benefits but wildlife, the environment and the community all lose out

Many thanks in anticipation of your assistance

St Anthony's
Battledown Approach
Cheltenham
Gloucestershire
GL52 6QZ

Comments: 9th August 2020

We wish to object to the above planning application being granted. It is protected land and with good reason. It is an integral part of what makes Cheltenham such a pleasant place to live, bringing the countryside close to the town. It is not in the Cheltenham Plan and nor should it be.

We use Harp Hill regularly, on foot, by bicycle and by car. The traffic there is already surprisingly heavy and occasionally dangerous particularly since the development of the old GCHQ site (to which we did not object). Any extra development on the Oakley Farm site would lead to unsustainable and unpleasant amounts of traffic with potentially huge queues at both the Hewlett Rd and SixWays junctions.

New housing developments generate children of school age. At secondary level there are no school places this side of town. Pittville and Balcarras are both full and oversubscribed and the new school in Leckhampton will almost certainly become oversubscribed.

So, we strongly object to development of any size on this site.

90 Hewlett Road
Cheltenham
Gloucestershire
GL52 6AR

Comments: 27th January 2021

I am writing to strongly oppose the planning application for the development of 250 houses on the Oakley Farm Fields site on Harp Hill reference 20/01069/OUT.

This is an area of AONB enjoyed by many in this area which will be significantly spoilt. Most importantly Harp Hill, Aggs Hill and Greenway Lane, are all rural roads and cannot support the amount of traffic which is already now using them. The new planned development alongside the development of the Cromwell Court site in Greenway Lane will cause a huge increase in traffic which is unsustainable. This has been well evidenced during the lockdowns when more of the town's population have been gaining the benefit from walking and accessing this area as a rural leisure retreat and this will be ruined. Owning an allotment, as we do at the Havers, there has been a large increase in the amount of wildlife which has been invading closer to the town's outer boundaries and this development will push this problem further, as the fields are reduced.

Lastly we have a rich and coveted countryside which borders on our town and gives an ambiance to the whole area. If the open fields are eroded through more developments and the roads and the lanes become congested this area leading to Cleeve Hill and the Pylons will be lost and spoilt for good. So as a local resident who walks regularly here, I would urge that a strong opposition is made to this proposal.

21A Hales Road
Cheltenham
Gloucestershire
GL52 6SF

Comments: 21st February 2021

I would am emailing to state my objection to the proposed development on Oakley Fam Pastures. This land forms part of an area of outstanding natural beauty and is enjoyed my many residents both locally and from nearby surrounding areas. Not only would building on this land, remove a well loved route for walkers but it would also destroy the habitat of wildlife. The land here has also been known to flood and like other recent developments in Gloucestershire seems a non-sensical patch of land on which to build. There is no need for rural areas like this to be compromised whilst there are still opportunities for brownfield development in the area.

I sincerely hope that the permissions for this development are retracted.

Milbourne House
Battledown Approach
Cheltenham
GL52 6RA

Comments: 29th March 2021

Having just moved to Cheltenham Battledown Approach, we were astonished to find out that the AONB area previously known as Oakley Farm - five beautiful pastures, has been sold off to a private developer who fully intends to ignore the AONB status and build 250 houses over this green space. What on earth is going on??? Brownfield sites are clearly the priority for redevelopment not open "protected" green areas. The council will be aware that there has been over the past three years substantial development of numerous new homes on the old adjacent GCHQ site. Moreover, Harp Hill road is already woefully inadequate from all road users point of view; no provision for pedestrians, and narrow lanes for cyclists and vehicles of which there are already too many clogging up the junction at the bottom of the road. Surely there can be absolutely no case whatsoever to build more housing on a green area nominated as AONB.

Please register our very strong objection to the developer's plan to do anything other than sell the land to the council to ensure complete future protection from totally inappropriate money-making schemes by unscrupulous opportunistic developers.

Please; NOT ON YOUR WATCH!

29 Oakhurst Rise
Cheltenham
Gloucestershire
GL52 6JU

Comments: 30th March 2021

I strongly object to this development. The AONB is being eroded away and this would have a huge negative impact and set a terrible precedent. The character of Cheltenham

on this eastern edge is under severe threat. Flooding is also a major issue and no amount of SUDs will cope with the enormous extra load on the drains. Why not stick to building houses on the western side of town, with good transport links and access to jobs.

Hilcot
Stanley Road
Cheltenham
Gloucestershire
GL52 6PF

Comments: 14th August 2020

I object to this development on many levels. Primarily because we need to protect AONB status. This time of Covid has shown us all how important nature is to mental health and well being and this area is a key natural beauty spot for people on this side of town.

We do not need to build on every bit of green infill. The town centres are being reimagined and could provide good housing opportunities. It is short sighted to concrete over areas which on environmental, climate and mental health grounds all add value to longterm well being and quality of life for everyone.

On a more practical level there are not the amenities for 250 new dwellings. The road access on Harp Hill would be dangerous and there is not the doctors surgeries, schools and shops to create a healthy community. We do not want ghettos of dwellings around a supermarket, we need to thinking of designing communities which foster collaboration and inclusion.

Please reject this dystopian application.

willow farm
green lane
little witcombe
gl3 4ty

Comments: 5th February 2021

The proposed plan should never be allowed in an ANOB. Housing density being comparable with the Oakley estate is not what could possibly be considered "Outstanding Nature Beauty"

The housing plan appears to make little allowance for car parking resulting in the usual cars parked on the pavements with white vans obscuring the forward traffic views constituting a danger to young children and other pedestrians.

Should any planning be given it must be for high quality individual buildings that would have no on road parking and building styles that would pleasing to the eye and blend into the present greenfield countryside. This is an ANOB.

15 Joyford Passage
Cheltenham
Gloucestershire
GL52 5GD

Comments: 21st February 2021

These slopes are an AONB and need preserving for future generations. There are surely more suitable brownfield sites available for housing infill. Additionally, the local road network is not suitable with little scope for improvement and integration into the current layout.

19 Alvington Drive
Cheltenham
Gloucestershire
GL52 5FS

Comments: 11th October 2020

This is an AONB that we should protect. We are fortunate to have beautiful views of this from our property. We can see that on this site there is diverse wildlife. We often see deer, badgers, foxes and bats and these are feeding on reptiles and insects in the fields. These deserve our protection of their sensitive and established habitats

The site is home to a vast number of trees and hedgerows including 39 Oaks, Hawthorn, Maple, Ash and Sycamore, most of which are now protected by a Tree Preservation Order applied to the land after felling was carried out. Many of these trees are mature and form magnificent silhouettes across the AONB vista, as well as provide essential habitats for wildlife. We enjoy these trees throughout the year and observe their green summer canopies and winter silhouettes. It is a wonderful area of ancient oaks in open sloping grassland and is afforded abundant wildlife. Today it is used for grazing sheep with the wild deer grazing along side them. The area and far reaching views to Cleeve Common can be seen clearly from the public footpath between Harp Hill and Pillowell Close.

This beautiful part of the Cotswolds AONB is viewed by many locals and visitors to Cheltenham. Walkers, ramblers, cyclists, horse riders, drivers and families with children frequently use the surrounding pathways, lanes and roads of Oakley Farm Pasture Slopes to enjoy the vista of this spectacular landscape at the foothills of the Cotswolds Escarpment. Harp Hill is a popular viewing point of this magnificent countryside for both visitors to, and residents of, Cheltenham.

Until recently fantastic views of Cleeve Common and beyond were visible from Harp Hill, but unfortunately Robert Hitchins Limited has neglected the hedgerow which had previously always been maintained, and which now blocks this view. Ironically, partially removing the hedge and building an access road to a large housing estate is cited as one of the benefits of this planning application (according to Robert Hitchins Limited) as it will allow people to enjoy the view! - the view that local people and visitors had always been able to enjoy before the land was purchased by Robert Hitchins Limited.

Other factors which could present significant environmental impact are ecology and biodiversity, geology, flooding, traffic, pollution and local infrastructure. In the winter the snow sits undisturbed on the hill and melts slowly away. Using this land for housing will

cause snow to melt quickly and may cause flooding on the estate already built where we live. Developing the land will mean rain water will have less opportunity to natural drain.

Traffic will be increased on Harp Hill and will cause a significant increase on the small roundabout onto Priors Road. Even a trip to the local supermarket will mean driving this way.

The urbanisation of Oakley Farm and the general over-development of areas such as this, which can be seen from the surrounding AONB, would be detrimental to the community, which thrives on its proximity to this green space. Schools are already over-subscribed nearby.

The outline planning application should be presented in full detail due to its size and highly sensitive nature. Instead, all details are reserved for future consultation and only the 'access road' has been specified. This means that at this time, the public cannot view or consider what is being proposed. This is undemocratic.

The landowners have commented on their own behaviour of allowing the hedge to become overgrown (and block the view) and are using it to justify their planning application. They are proposing to reopen this view for everyone by removing part of the hedgerow, building a road network through Oakley Farm Pasture Slopes, and building 250 houses. A better option would be to leave the land alone and return to trimming the hedgerows as they have always been maintained in the past.

The obliteration of the highly valued land at Oakley Farm will not only harm the land itself, but also change the character of the remaining surrounding area. Existing properties maintain the rural and semi-rural character of this setting; a large housing estate would amount to urbanisation of this area, resulting in a destructive transformation that would eliminate its existing beauty.

The Grade II Listed Pavilion on Hewlett's Reservoir (built c1870) can be seen from various points across Oakley Farm Pasture Slopes. If this development is approved, both the view and setting of this historic listed building will be adversely affected, and so deserves our protection and conservation.

The applicant is claiming that existing new development near Oakley Farm detracts from the land's beauty. However, these houses were built on the existing brownfield site of the old GCHQ, a site that has been standing on the land since the 1950s.

There are other development proposals within the Cheltenham Plan that are currently under consideration which have more sustainable locations than that of the proposed site. The semi-rural area of Oakley Farm is unsuitable for further increased traffic.

National Planning Policy says that great weight should be given to conserving and enhancing areas such as this in the AONB. Let's protect not destroy, because its destruction is irreversible.

The absence of a five-year housing supply does not automatically mean permission should be granted. According to the National Planning Policy Framework (NPPF), the protected status of the AONB can provide a clear enough reason for refusal. Oakley Farm Pasture Slopes has been a target for inclusion on the "Cheltenham sites available for development" (including by the current landowners) on a number of occasions. Each

time the site has been recognised as unsuitable in general owing to its nationally recognised status as part of the Cotswolds Area of Outstanding Natural Beauty (AONB). There are many other sites within the Joint Core Strategy Area, of lower status, that must be exhausted before considering exceptional and protected areas.

We do not support this development and would like to protect this area.

Gray House
Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PR

Comments: 2nd March 2021
Letter attached.

Los Pepones
Copt Elm Road
Charlton Kings Cheltenham
Gloucestershire
GL53 8AG

Comments: 25th March 2021

This is AONB land specifically not intended for house building purposes for which brownfield sites would be more appropriate. Harp Hill forms part of the lead-in to the Cotswold Scarp/Way and as such forms an amenity for walkers and cyclists heading towards the scarp or getting as near to it as they are able (think older walkers, cyclists). During lockdown this route has formed an indispensable route to the hills as well as a goal in itself; a release; a lung; a sight for sore eyes. Housing would be a blot on the landscape, an urbanisation of a rural space. The increased traffic of 400 cars or more would make walking, cycling or riding extremely dangerous and add to chaos at lower junction with Harp Hill.

Flat 3
46 London Road
Cheltenham
Gloucestershire
GL52 6DY

Comments: 28th July 2020

I Object to the Oakley farm planning application for the following reasons

1/ There is already a planning restriction in place on Harp Hill with regard to the existing development on the old Oakley GCHQ site which permitted access to only 40 dwellings in total. This must be respected.

2/ 250 dwellings would bring up to and possibly more than 500 vehicle movements each morning and evening during peak traffic hours. The surrounding road network is already

overloaded and this number of extra vehicles moving in the immediate area would put unbearable stress on the traffic system. These roads were not designed, or capable of coping with, a huge increase in traffic volume.

3/ Many of the local roads do not have any footpaths at all and I have taken it upon myself to clear and maintain hundreds of metres of grass verges in the locality to create a safer environment for myself, my family, my grand-daughters and the local community to walk in

4/ The site is located in the AONB and any development would steal a beautiful area of Gloucestershire from the environment forever. An AONB is a designated landscape whose natural beauty, distinctive character and amenity value should be safeguarded in the national interest

5/ I see that the applicant is claiming that the existing new development that surrounds Oakley detracts from its beauty... but now they want to build more houses and detract further from its natural beauty which seems to be highly hypocritical.

6/ My family take great pleasure in the natural wildlife that inhabits this area - Roe Deer, Muntjack Deer, Foxes, Badgers, Toads, Lizards, Field Mice and more and a huge array of birdlife. If this land is developed this wild life will potentially be lost to this area forever

7/ On a more personal note I was assured by representatives of Robert Hitchens at the Open forum they held at the Whaddon Community Centre that the development would be thoughtful, sensitive and respect the interests of the homeowners most likely to be affected by the building. I now see that they wish to build a massive 5-bedroom house less than 20 metres from my garden boundary taking away the view of the landscape that encouraged me to purchase this house just three short years ago. Not my understanding of thoughtful or sensitive at all. I have spent considerable time, effort and money improving my property and installing 7 metre wide floor to ceiling windows on the ground floor rear elevation to be able to observe and appreciate the open land behind my home. I would welcome all, or any of the planning department to visit my home and gardens to see the potential changes and loss of amenity that I face.

In my opinion it would be a travesty if this development were allowed to be built and I urge you to refuse their application once and for ever in full and keep this land unspoilt for everyone to enjoy.

Larks Rise
Ashley Road
Cheltenham
Gloucestershire
GL52 6PH

Comments: 29th July 2020

This application is for large scale development in the AONB.

The access proposal and consequent traffic resulting are potentially dangerous. Harp Hill is already overloaded and needs careful navigating.

All the local Junior Schools have no further capacity.

Hewlett Rise
Beechwood Close
Battledown
Cheltenham
Glos
GL52 6QQ

Comments: 30th July 2020

I am writing to OBJECT to the proposed housing development by Robert Hitchins at this site.

Apart from all the other reasons for objection that others will refer to, I will add this. I work as a Regional Director for Highways England, and am responsible for the maintenance, operation and development of a region of the Strategic Road Network in the country. In this role, my team routinely work with developers and local authorities to understand proposals for developments similar to the one proposed here. In any such proposal, there have to be clear indications as to how the impacts of additional traffic on the existing road network and the local community can be mitigated effectively.

Whilst I have not studied the plans in detail, as a local resident I would find it difficult to understand how such mitigations could be achieved in this case. Even on this basis alone, therefore, it would seem inappropriate to proceed with the plans as detailed. I would add though that I also object on numerous other grounds such as encroachment onto an AONB, potential ancient woodland etc.

115 Whaddon Road
Cheltenham
Gloucestershire
GL52 5NX

Comments: 31st July 2020

I am concerned about the proposed housing development plan for near Harp Hill. If it is already been rejected for local plans because the area is of natural beauty this surely should not be overturned.

Concerns about flooding risks and more congestion at the junction of Ashley Road and London Road also spring to mind as well as more cars rushing along Mill Lane which is dangerous as it is basically a twisty country lane.

I appreciate houses have to be built but I understand, lots of houses and new schools are already being built in other areas of Cheltenham.

I imagine children of these proposed houses may have a considerable journey to school as Balcarras Academy is overflowing and Pittville school is quite small.

Sudeley
Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PX

Comments: 31st July 2020

I am writing to object to the proposed building of 250 houses on the Oakley Farm Pastures site with access off of Harp Hill.

I am well aware of the need for more housing but this really seems to be a step too far and will have considerable negative impacts on residents in the area and indeed the concept of what society thinks of its best resources - in this case the beautiful landscape of Cheltenham.

The traffic implications for Harp Hill are dire with probably in excess of 500+ car journeys a day using the hill. It is already a dangerous road where drivers speed - the flashing speed sign has no effect whatsoever. The exits at Priors and Greenway Lane simply cannot cope with the increased volume and the infrastructure of the Harp Hill road itself is already failing - three weeks ago a considerable amount of tarmac ended up in our driveway after the heavy rainfall. The idea that the majority residents of the new estate will use public transport living up a hill are laughable! My children walk to school and have already been frightened by speeding traffic - this will only get worse and I have already written to the council to no avail about this matter. I currently have to be incredibly cautious when exiting my driveway in the car because of the nature of the traffic on the hill already - this will only become more problematic.

There is an abundance of wildlife in this area and this green space is vital. The area has been identified as AONB so should surely have some protection? I have photographs of deer in my garden should you wish to see evidence of this. Do we really want to concrete over another green area? Once lost it can never be replaced. So much for worrying about conservation. Cheltenham markets itself as the centre of the Cotswolds but is looking to build on those very 'wolds'. We will become just another concrete sprawl town.

The increased risk of flooding should also be taken into consideration as at the bottom of Harp Hill by the two mini roundabouts the road floods regularly - this will only increase with a large scale housing development.

I have read on Gloucestershire Live that other areas have been identified near the Golden Valley for new homes - Oakley Pastures was deemed not suitable in 2015 so what has changed in that time?

On a note personal to our home I fear that the increased heavy traffic will damage the road and possibly the structure of our hose which already shakes when lorries pass by.

I hope you will consider my objections and thank you for your time.

220 Hewlett Road
Cheltenham
Gloucestershire
GL52 6UJ

Comments: 31st July 2020

We strongly object to anymore houses being built on the land of Oakley Farm site, the roads are congested enough as it is the drains can't take anymore and we will lose the wonderful views of open countryside let alone miss the wildlife.

19 Wessex Drive
Cheltenham
Gloucestershire
GL52 5AF

Comments: 31st July 2020

We write to OBJECT to above planning application for the following reasons:-

Wildlife - the impact on wildlife in the area will be enormous. Wildlife is struggling countrywide. We should be protecting our animals and not building on areas where there is a wealth of animals. I appreciate the need for new homes but these should not be built on AONB

Trees - We need to protect our trees and support the ecosystem in the area

Environment - The development will have an impact on the environment - more pollution etc

Traffic - The roads are already under pressure in the area due to the large development by Sainsburys. The roads will not be able to cope with the extra burden of potentially 200 - 700 more cars.

Schools/Doctors - School and doctors in the areas are struggling to cope with the size of the community they serve already. This will put a further burden on our social structure in the area.

it may set a precedent for further development in the area.

Surely there are more suitable sites for development? This is a gem of an area for people locally, I get bats in my garden coming across from this area and regularly see deer in the fields. It is important for people's mental wellness to be able to see and enjoy nature. If this development goes ahead it will be an absolute scandal and have a huge negative impact on animals, the environment and people.

Coversdown
Birchley Road
Cheltenham
GL52 6NY

Comments: 3rd August 2020

I am writing to OBJECT in the very strongest terms to the above planning application proposing to build 250 houses on the Oakley Farm site.

It is hard to understand how this application has even been considered given that this is an AONB.

INFRASTRUCTURE - The original planning application for the Sainsburys development included a doctor's surgery, something that never saw the light of day. To consider building another 250 dwellings without providing the necessary supporting infrastructure of doctors/dentists/schools/bus routes etc is totally unacceptable. There is also the consideration of how hospitals in Gloucestershire are expected to cope with the ever increasing demand, particularly Cheltenham General which, despite admirable effort from our MP, is struggling to maintain it's status.

The situation with schooling is just as critical with no free spaces available at schools in the area.

FLOODING - The large Sainsburys development has already had a detrimental effect on the ability for land to drain without flooding.

SEWERAGE - The existing sewerage system in Cheltenham is well known to be antiquated and in need of considerable upgrading. To put further pressure on this without ensuring an adequate, additional sewerage alleviation programme will only exacerbate existing problems of sewer collapse.

TRAFFIC - Additional traffic from the large Sainsburys development has already made the roads around this area much busier and more dangerous. To add a further 250 dwellings with the potential increase of 500+ vehicles, entering/egressing via Harp Hill, a road not only in an appalling state, with a challenging gradient and treacherous in bad weather, will only serve to antagonise the bottleneck of traffic and increase pollution and more importantly the potential for accidents. Hales road is already congested.

PEDESTRIANS - The lack of pavements from part way up Harp Hill, combined with increased vehicular traffic puts pedestrians at greater risk.

ENVIRONMENT - There has been much in the public domain about the need to protect our endangered wildlife, flora and fauna. This will only serve to fly in the face of that.

Comments: 14th September 2020

In the light of the fact that Gloucestershire Wildlife Trust has designated the meadow as a local wildlife site, I would like this point added to my objection.

The local plan was agreed before the full biodiversity of the site was recognised. So 25 is at the upper limits of viability. 43 is unnecessary overdevelopment.

Losing grassland to trees (with dubious survival rates for the latter on steep clay hills) would be regrettable

HD4 requires protection of the biodiversity features not replacement, or mitigation for loss. We are losing important hedgerow, mature trees, an enormous badger sett and strategically important grassland (county ecologist says at least 57% will be lost).

How can this development proposal be considered to be "protection of the Biodiversity" ?

9 Ledbury Court
Cheltenham
Gloucestershire
GL52 5FZ

Comments: 7th August 2020

I wish to strongly object to the proposed building of 250 homes, this is already a developed area and getting rid of another area of outstanding natural beauty is detrimental to the environment, natural habitat of animals and the local residents. My objections are furthered heightened by these reasons below:

Primary and secondary schools in the area are already over subscribed. Building more houses here will make it even more difficult for families to secure a place in a school near their home, causing undue stress and disadvantaging parents' chances of getting their children into a school that accommodates their values and beliefs.

Lack of dentists in the area taking on NHS patients is already an issue in the area. I have had to resort to joining one in Gloucester which is inconvenient. Dentist practices already can't cater for the number of residents in the local area and building 250 homes is going to stretch these services farther and become an inconvenience for more people.

My home directly overlooks the site with my garden backing onto the proposed development. I am outraged and extremely disappointed with the proposals due to the visual impact the development will have on me as well as the loss of our privacy. As a family with young children I am uncomfortable with having two (proposed) houses directly backing onto our house, especially with these being on a hill, therefore being able to look into our garden and our home. Being stripped of our current beautiful views of the field with someone else's towering garden is somewhat unsettling.

The building in this field not only jeopardises our privacy but impacts the wildlife living in the fields. We regularly see roe deer, muntjac and bats. I am also concerned about the loss of the hedgerows and the many mature trees on the site.

The proposed green space/parkland should be boarded with the Permission Oakley Grange and Eden Villas site not at the top end beside Harp Hill where houses will not directly back on to it. There should be an area of green space, creating distance between houses and gardens around Oakley Grange.

Congestion and the sheer volume of traffic is another huge concern. Another 200-500 cars on Priors Road and Harp Hill is going to have a negative impact on the area, local businesses and residents.

Finally, I have huge concerns regarding flooding. There are already floods from the runoff from Harp Hill with any heavy downpour. The extra runoff from this site would potentially make this situation worse and dangerous. Also, with the sloped nature of the site it is likely that there would be runoff down the hill towards my home and garden. The

proposed plans to manage this looks inadequate and the removal of the fields is detrimental to natural drainage.

1 Battledown Mead
Cheltenham
Gloucestershire
GL52 6QA

Comments: 29th December 2020

I would like to register my objection to this proposal to build on this area of outstanding natural beauty. This hill-side can be seen from miles around - in particular from Cleeve Common and the Cotswold Way.

This development will spoil the view of our beautiful Cotswold hills and the look and feel of Cheltenham which, rather than "nestling in the Cotswolds" would be sprawling over the Cotswolds.

9 Southfield Court
Churchdown
Gloucester
GL3 2ED

Comments: 3rd August 2020

I am writing to object to the outline planning application relating to Oakley Farm.

I regularly visit the area around Harp Hill and enjoy the countryside views of which Oakley Farm is part.

My understanding is that Oakley Farm Pastures sits entirely within the AONB and as such has been designated for conservation and is protected. Additionally great weight should be given to conserving and enhancing landscape and scenic beauty in areas like this which are in the AONB.

I find it difficult to understand how there can be any possible reason to build on this land when other areas around Cheltenham have been identified in the local plan. What is the point in having areas of the county being named as AONB, Green and Brown Belts and Flood plains?

The likely damage to wildlife habitat and the necessity to force relocation of those animals which currently roam freely on the pastures is also concerning.

Many thanks for taking the time to read my objection.

12 Hales Road
Cheltenham
Gloucestershire
GL52 6SE

Comments: 3rd August 2020

I wish to strongly object to the planning application ref 20/01069/OUT.

I live on Hales Road and the traffic is already excessive and disruptive to the residents here and this proposed development will only make the situation worse, incurring more delays to us in simply trying to exit our drives.

There were serious issues with flash flooding on Hales Road in Early June of this year, and again this will only become worse.

Proposed access to this site is not safe due to the lack of pavements on Harp Hill.

Our AONB's are continually being eroded and this proposed development is not in anyway suitable for this site.

Please do not go ahead with this proposal.

23 Eldon Road
Cheltenham
Gloucestershire
GL52 6TX

Comments: 6th August 2020

I object on the basis of an excessive increase in traffic on Harp Hill and subsequently onto other local roads.

1. I use Harp Hill as a pedestrian and cyclist to access the Cotswolds AONB. It is a narrow road, crumbling in places, without a pavement for its full length. Vehicles regularly break the 30mph speed limit and overtake cyclists and pedestrians dangerously. The increase in traffic will only see this situation worsen and may result in a serious injury or death.

2. Traffic from the development will spill onto Hales Road and Hewlett Road arterials which are already very busy during peak periods. It can often take a long time to get onto these roads from the side roads due to constant traffic flow. The queues on these roads cause 10 minute plus delays and push noxious fumes into local houses. 250 dwellings will see this increase significantly.

n.b. in the peak traffic flow analysis document submitted with the application, it appears to suggest that some traffic will flow into Stanley Road, which is blocked by a barrier open to Battledown residents only, therefore this analysis cannot be relied upon.

Glenlovat
Oakley Road
Cheltenham
Gloucestershire
GL52 6NZ

Comments: 8th August 2020

I believe the developer is planning on some 3 cars per household in the new development. That's a potential 750 more cars on Harp Hill, more than once each per

day. I regularly walk on Harp Hill, e.g. to get to work or town (in "normal" times), and my children use it to get to school. This amount of extra traffic scares me. The road is narrow, cars frequently park on the pavement - forcing pedestrians onto the road - especially those with pushchairs, wheelchairs (the Battledown Children's Centre is here), or those a little wider than very thin. Many cars already use this road, often travelling well in excess of the 30mph speed limit. Furthermore, the road is already in a poor state, and having heavy construction traffic on it would no doubt cause further damage. We would, presumably, have to live with that until work was finished!

In addition, on occasions when I drive to work, the sun rises behind the hill. At around 07:45 in February this makes exiting Oakley Rd onto Harp Hill completely blind. More traffic coming down the hill at speed will make this even more dangerous. How long will it be before someone is fatally injured in an RTA?

I will assume the new residents would want school places (Holy Apostles' PS is very oversubscribed, I imagine the same is true at Prestbury St Mary. Pittville School is - likewise - oversubscribed. There are limited medical practices locally.

All this is in addition to the destruction of wildlife habitats on the AONB.

La Calanque
Camp Road
Cheltenham
Gloucestershire
GL52 6PS

Comments: 12th August 2020

We wish to strongly oppose the above proposal for such a large building programme, not simply because Battledown is an AONB but because Harp Hill is completely unsuitable to serve such a large ADDITIONAL number of dwellings.

Harp Hill has suffered increasing pressure from all the building on Battledown, Harp Hill and Aggs Hill. What was little more than a country lane is to become a feeder road to a large conurbation. The road is dangerously narrow at a dangerous bend, with not only a concrete block near the edge of the road, but has only a narrow pavement on one side and no cycle track. Heavy traffic and huge concrete and debris-filled lorries daily thunder round this dangerous bend.

Surely a responsible council planning department should be equally concerned about the infrastructure being adequate to serve the proposed population, rather than simply meeting government requirements to build more homes.

Please give this your serious consideration.

Haytor
65 Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PR

Comments: 12th August 2020
Letter attached.

7 Alvington Drive
Cheltenham
Gloucestershire
GL52 5FS

Comments: 13th August 2020

I strongly object to this application for development on greenfield land in an AONB for the following reasons:

- 1) This contradicts local and national commitments for increased sustainability and to urgently curb biodiversity losses.
- 2) development of steep slopes increases flood risk and I am not convinced that the flood mitigation measures will be effective, particularly in view of increased future risk due to climate change- this is not a climate change resilient development. Cheltenham council should be aiming to increase vegetation cover on escarpment slopes to mitigate increased future flooding, not building on them.
- 3) the development isolates a significant number of veteran oak trees. Although they plan to be conserved, cutting off natural corridor links with the wider escarpment will adversely affect the enormous biodiversity value they have.
- 4) The cotswold escarpment limestone meadows are home to rich and important biodiversity including the Duke of Burgundy butterfly which is threatened across Europe. This development sets a dangerous precedent for future encroachment and reduces the greenfield buffer protecting these rare habitats.
- 5) The natural environment is one of Cheltenham's greatest assets, attracting local, national and global visitors. The town should be aiming to be a conservation and green economy leader, and not permitting urban sprawl into important wildlife areas.
- 6) As a regular commuter to Oxford I am concerned about traffic leading east out of the proposed development along Greenway lane, Mill Lane and Harp Hill. These single track, poorly maintained country lanes are the only access east out of the development. They are already busy and borderline dangerous at rush hour, as people try to avoid the traffic along the A40 in and out of Cheltenham, and to access the schools on Greenway lane and in Charlton Kings. They are wholly unsuitable for increased levels of traffic. I see no provision to improve traffic flow along these roads in the plans.

10 Aylburton Road
Cheltenham
Gloucestershire
GL52 5FB

Comments: 7th January 2021

I object to these plans based on using Harp Hill every day for cycling to work and finding it already a dangerous/unpleasant place to ride a bike due to the level of traffic and narrowness of the road. Adding an additional 250 houses will cause chaos on the roads and be dangerous to other road users such as cyclists and walkers.

The impact on biodiversity and the environment is absurd considering we should be looking to preserve areas of particular interest for wildlife and the use of the residents of Cheltenham. Destroying an area of natural beauty is surely not the way forward and other areas around Cheltenham should be considered for development with less of an environmental impact.

Having purchased a new build house on the site of the old GCHQ it is also worth noting that the green areas are never left green as they should be (it tends to be a slap dash approach to throwing some shrubs and bushes around). It takes many years for the trees and greenery to grow back and it would be devastating to lose this currently beautiful area.

58 Eldon Road
Cheltenham
Gloucestershire
GL52 6TU

Comments: 27th August 2020

This is an area of outstanding natural beauty being sacrificed on the altar of profiteering property developers added to which will result in an increase in traffic volume on already heavily used roads in the immediate and surrounding areas resulting in an increase in pollution. Nearby residential roads are turning into rat runs and this only adds to the problem.

It will put pressure on local services. The already difficult situation of catchment areas, and finding places for children in local schools would be further exacerbated.

Why would Cheltenham borough council even contemplate this?

is the plan to turn Cheltenham and surrounding areas into a concrete jungle??

2 Churchill Drive
Charlton Kings
Cheltenham
Gloucestershire
GL52 6JJ

Comments: 19th January 2021

This area is already significantly developed into the GCHQ site, but this proposed development encroaches on an AONB. This green area provides a much needed buffer for nature and views and there are a number of mature trees. Housing in this location is already congested. The impact of traffic and pollution would be significant.

7 Copt Elm Close
Charlton Kings
Cheltenham
Gloucestershire
GL53 8AD

Comments: 20th March 2021

I object because this land is in an area of outstanding natural beauty and because of the wildlife habit which will be destroyed and disrupted.

Also because of concerns about increased traffic , pollution and congestion around the Sixways crossing which is already incredibly busy

97 Ryeworth Road
Charlton Kings
Cheltenham
Gloucestershire
GL52 6LS

Comments: 6th August 2020

Our areas of outstanding natural beauty must be protected for the precious fauna and flora that has evolved over many centuries - once it is gone, it is gone!

We need these areas for our good mental health and general well being and they should not be for development. There are plenty of brown field sites and disused premises that can provide affordable housing.

32 Cleeve View Road
Cheltenham
GL52 5NH

Comments: 4th March 2021

I object to this application due to the enormously destructive impact it will have on the land itself, affecting a huge variety of plants and wildlife, some of which are under threat already. I am also very concerned about the impact of such a large development on the flood water that these fields soak up during the winter. As a regular walker I know that there are times of year when this land almost resembles marsh - where will this water be forced to go? Pollution from the extra homes and cars will also have a negative impact on the area surrounding the development . Traffic is already increasing to an unsustainable level in the lanes around Harp Hill, leading to Charlton Kings and Whittington and this will become even worse.

16 Fossebridge Place
Cheltenham
Gloucestershire
GL52 5BW

Comments: 12th December 2020

Page 250

Due to the planned area being classed as an "Area of Natural Beauty" this planning for said houses should NOT go ahead, the disturbance to wildlife and natural habitats not to mention local farming will be catastrophic.

The increase in automotive traffic will increase congestion towards the roundabout at the bottom of harp hill leading to priors road to which it will not cope with added demand.

There is already enough congestion and delays to that area already. The increase in foot traffic as a result also will raise safety concerns around the lack of pavements along roadsides an no street lighting along that road.

68 Fairford Road
Cheltenham
Gloucestershire
GL52 5FQ

Comments: 12th December 2020

We strongly object to this planning application.

Firstly it is an AONB home to local wildlife that should be treasured and protected, we have already eaten away at much of this land and this should be protected as per any national park. The land also holds archaeological significance which cannot be ignored.

Secondly, the area will be prone to flooding making it highly unsuitable for property development.

Access to this development will put an enormous strain on our already busy roads, as well as local infrastructure.

We are at a loss as to how this application is even being considered.

306 London Road
Charlton Kings
Cheltenham
Gloucestershire
GL52 6YF

Comments: 28th March 2021

I strongly object to the proposal. It is most inappropriate. It is an AONB and should be accorded the careful consideration it deserves. By being situated on a slope it will totally change the character of the area. It will be visible from some distance away. Also this is a public amenity enjoyed by many people walking the several footpaths. This has especially been the case during the lockdowns. The footpath from the reservoir to the flood prevention facility near the crematorium is a natural boundary between the build-up area and the pristine farmland.. Once this boundary has been breached it will only lead to more applications to build on greenfield sites. The access roads are totally unsuitable and it will increase the road traffic in a very sensitive area. I couldn't believe that any developer would consider such an unsuitable site.

15 Portland Square
Cheltenham
Gloucestershire
GL52 2HT

Comments: 17th July 2020

There are many better options for additional dwellings for Cheltenham residents than building on green fields in an already overcrowded area.

This will be a nightmare for Harp Hill residents with the additional vehicle movements. Harp hill is a popular walking route easily accessible for north Cheltenham residents. Taking away farmland and adding in so many - any - houses in this area benefits only the developers.

Covid has brought home to us all how important outdoor spaces are and also how much existing office space is no longer required. The priority should be to re-purpose excess retail and office space.

38 Greenway Lane
Charlton Kings
Cheltenham
Gloucestershire
GL52 6LB

Comments: 13th December 2020

I'm really not sure why tax payers money is even being wasted on considering this proposal?

The area in question is not part of the Council's signed off 2020 housing plan/ strategy. It's not part of the plan so focus on the areas that are.

The area in question is AONB. Surely that is enough in itself to stop the discussion in its tracks? Enough is enough. We already have to live with one hideous scar to our beautiful town's surrounding landscape with the old GCHQ Oakley site.

Then there is the environmental impact on species and ecosystems which is just unthinkable.

The access to the site, for 250+ homes, is totally unsuitable. Harp Hill, Greenway Lane and Mill Lane are already busy enough. No matter how much re-working of the mini roundabout at the bottom of Harp Hill and Priors Rd isn't going to be sufficient to cope with the huge amount of additional demand that will be placed on what is already inadequate infrastructure.

As many commentators have already raised, the Schooling in the area is already maxed out. How can it possibly therefore cope with the additional demand of 250+ homes?

At the end of the day its developer greed and profit that is driving the agenda here. As outlined by the Cheltenham plan there are far more suitable development areas that have already been painstakingly identified. This one should not even be up for debate. Once

it's been built on this area of AONB will be gone for ever. The Council must not allow this to happen.

65 Wessex Drive
Cheltenham
Gloucestershire
GL52 5AF

Comments: 20th July 2020

I live at the top of Wessex Drive & am very concerned about the volume of traffic that this proposal of 250 new houses will generate, it is bad enough at present trying to drive out of Hillview Road especially after the Sainsbury's store & new housing on the old Okley site were built.

Also we had severe flooding in this area in 2007 with water running off the hill & if 250 houses were built on this site it may give cause for more flooding. The drains in this area are inadequate for a high volume of surface water drainage such as we experienced then.

Another consideration is that it is an Area of Natural Beauty & as such it should be kept as such for future generations to enjoy

12 Fairfield Park Road
Cheltenham
Gloucestershire
GL53 7PQ

Comments: 31st July 2020

I object to this excessive development in a AONB. We need to build housing but not at the expense of the areas already defined as not to be lost.

Coversdown
Birchley Road
Cheltenham
GL526NY

Comments: 3rd August 2020

I am writing to OBJECT in the very strongest terms to the above planning application proposing to build 250 houses on the Oakley Farm site.

It is hard to understand how this application has even been considered given that this is an AONB.

INFRASTRUCTURE - The original planning application for the Sainsburys development included a doctor's surgery, something that never saw the light of day. To consider building another 250 dwellings without providing the necessary supporting infrastructure of doctors/dentists/schools/bus routes etc is totally unacceptable. There is also the consideration of how hospitals in Gloucestershire are expected to cope with the ever

increasing demand, particularly Cheltenham General which, despite admirable effort from our MP, is struggling to maintain it's status.

The situation with schooling is just as critical with no free spaces available at schools in the area.

FLOODING - The large Sainsburys development has already had a detrimental effect on the ability for land to drain without flooding.

SEWERAGE - The existing sewerage system in Cheltenham is well known to be antiquated and in need of considerable upgrading. To put further pressure on this without ensuring an adequate, additional sewerage alleviation programme will only exacerbate existing problems of sewer collapse.

TRAFFIC - Additional traffic from the large Sainsburys development has already made the roads around this area much busier and more dangerous. To add a further 250 dwellings with the potential increase of 500+ vehicles, entering/egressing via Harp Hill, a road not only in an appalling state, with a challenging gradient and treacherous in bad weather, will only serve to antagonise the bottleneck of traffic and increase pollution and more importantly the potential for accidents. Hales road is already congested.

PEDESTRIANS - The lack of pavements from part way up Harp Hill, combined with increased vehicular traffic puts pedestrians at greater risk.

ENVIRONMENT - There has been much in the public domain about the need to protect our endangered wildlife, flora and fauna. This will only serve to fly in the face of that.

Comments: 14th September 2020

In the light of the fact that Gloucestershire Wildlife Trust has designated the meadow as a local wildlife site, I would like this point added to my objection.

The local plan was agreed before the full biodiversity of the site was recognised. So 25 is at the upper limits of viability. 43 is unnecessary overdevelopment.

Losing grassland to trees (with dubious survival rates for the latter on steep clay hills) would be regrettable

HD4 requires protection of the biodiversity features not replacement, or mitigation for loss. We are losing important hedgerow, mature trees, an enormous badger sett and strategically important grassland (county ecologist says at least 57% will be lost).

How can this development proposal be considered to be "protection of the Biodiversity" ?

15 Wellington Lane
Cheltenham
Gloucestershire
GL50 4JF

Comments: 30th July 2020

This area is already under pressure from too much traffic, there are narrow lanes and the roads are not maintained. I can't imagine where the extra cars would all go. As a regular

cyclist and pedestrian of this area, I would fear for my own safety if this development were to go ahead . As an area of outstanding natural beauty it would be ruined by the proposed development

59 Fairford Road
Cheltenham
Gloucestershire
GL52 5FN

Comments: 6th August 2020

We wish to object, in the strongest possible terms, to the proposed development of up to 250 residential dwellings at Oakley Farm.

1. Overcrowded schooling. I need travel 5 km to primal school with my child because nearby schools are already full . I don't understand how a further 250 homes will have access to these, with many families needing to travel over double the distance of local schools due to over subscriptions. This defeats the point in our next generation being encouraged to walk or cycle to school when local education is full.

2. In addition, it is not only the education system which would struggle to meet the needs of a new estate, it is also the wider infrastructure e.g. doctors surgeries. I know many families who struggle to get doctors appointment within this area, not due to lack of commitment by the NHS but simply because the local infrastructure has not kept pace with house build in the area.

3. AONB. The fields backing on to Ham and Harp Hill are rife with an abundance of wildlife which is a joy to see and hear. 250 dwellings will no doubt threaten the survival of Owls, Deer, Badgers and more. Is there really no other housing solution within Cheltenham and the surrounding area that means it is necessary to destroy green sites? With the recent lockdown still fresh in mind, the countryside has been more important than ever in terms of Mental Health and exercise.

4. Harp Hill can not cope with the current volume of traffic, it is an incredibly busy and dangerous road (without pavements at the top) and planned access to the site from this road will only increase the risk of a significant accident. The routes from Harp Hill are similarly unable to cope with any additional traffic. Mill Lane is passable as single lane only in places, unmarked and without lighting or pathways. Greenway Lane backs up to the already heavy congested Sixways junction and Mill Lane ultimately exits onto London Road which is already a dangerous and busy road (at the dip). The bottom of Harp hill exits onto a small mini roundabout which can not cope with the current volume of traffic on Priors Road. A further development in this areas, with access onto the hill would increase the traffic on all surrounding roads to a dangerous and unsustainable level.

5. The other factor is that when the site at the rear of GCHQ was mooted, Planning restricted the number of houses allowed to 40 due to "the unsuitability of the Hill to take any further traffic" so even then the road was at maximum capacity, so I fail to see how a further 250 houses can be considered with the amount of cars that would incur.

We trust the Planning Department will take these factors into very serious consideration and refuse this application.

Goodwood
Newcourt Road
Cheltenham
Gloucestershire
GL53 9AZ

Comments: 10th August 2020

I wish to object to the following development on the following grounds:

This development is on ANOB land, a precious environment which would be lost forever. Green spaces must be preserved for future generations. To lose them is to harm those who will follow us.

The access to the development on Harp Hill is narrow, and the .increased traffic and here and on Hales Road will exacerbate the dangers posed by this.

Schools in this area are already oversubscribed and no provision has been made to address this.

Doctors' surgeries are already oversubscribed in this area and no provision has been made to address this.

Field House
Ashley Road
Cheltenham
Gloucestershire
GL52 6PH

Comments: 13th August 2020

I write in connection with the above planning application.

The development of this site would be extremely detrimental to the surrounding area. It is a site of AONB and should be conserved as such.

The building of 250 houses on this site would be a definite flood risk to this part of the town; having experienced the flood of 2007 when the water poured off of this land and flooded Sainsburys, (I remember the water being so deep in the car park, it came over my wellington boots) and into the houses opposite. The concreting over, by building houses, would hugely expedite the risk of flooding.

The road system in the area cannot cope with the amount of traffic now, let along the possibility of another 500 cars. The whole place will be gridlocked. It is no use saying people will use public transport or cycle, they do not. Harp Hill is not suitable for such an increase in traffic, (notice the state of the road!) nor is Greenway Lane. NB it is meant to be a Lane, not a highway. Harp Hill, with a steep incline and dangerous bends, is lethal in wet and icy weather. We know, having lived here for over 40 years.

Besides not having the infrastructure for such a development, there is the consideration of schooling, doctors, the hospital etc. to take into account. The increase of the population this development would create cannot be accommodated in this area.

The impact of this development would be huge and detrimental to the environment of this area, especially with the wild life that inhabits the land at present, which give the public an opportunity to appreciate all that an ANOB means.

9 Cotswold Lodge
Pittville Circus Road
Cheltenham
Gloucestershire
GL52 2QP

Comments: 21st August 2020
Objection

41 Church Road
St Marks
Cheltenham
Gloucestershire
GL51 7AL

Comments: 10th February 2021

This is AONB land. It should not be lost to a housing development. With an increase in home working and online shopping, there is likely to be less need for large shops and office buildings in town. There will be a growing availability of brownfield sites that can be used for housing developments. This needs a major re-think and some imaginative town planning. We should not be losing beautiful countryside to housing developments.

31 Beechurst Avenue
Cheltenham
Gloucestershire
GL52 6TY

Comments: 5th August 2020

I OBJECT to the proposed housing development. I think it will impact very negatively to the neighbouring areas and will cause a huge amount of congestion at the bottom of Harp Hill. I also don't feel you should be allowed to build on AONB.

Crai House
Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PX

Comments: 5th August 2020
Letter attached.

Shawford
Oakley Road
Cheltenham
Gloucestershire
GL52 6NZ

Comments: 17th August 2020

My objection primarily is to the pollution and congestion that hundreds more people and their vehicles will cause to the existing residents .

This insane scheme will effectively "kettle" the residents of Battledown and surrounding suburbs.

At present we cannot access Hales Road easily from the Harp Hill side nor Battledown Approach and this situation is at breaking point!

In other words this scheme will trap us further.

On school days- you take your life in your hands if you decide to walk with your child up or down the hill.

There is only space for one car to travel up or down .
Envisage the delay that causes -and multiply that by thousands when you envisage how long it takes to access Hales Road; which is always bumper to bumper right now !

This lack of escape is doubled up if we try to access the London Road from Greenaway Lane in order to travel anywhere in Gloucestershire or indeed out of the County.

The roads are in an appalling state and even fixing the roads at present would cause utter chaos let alone with hundreds of extra people. I repeat there is only room on all exits and entrances from Battledown for one vehicle.

The existing residents on Battledown approach and Harp hill and Greenaway Lane need to park their cars somewhere and invariably that is on the roadside.

There is no room for any more people. The space is finite.

How do these destructive "developers' imagine they would get service vehicles on to that beautiful land?

There is NO viable access and there never will be.

Cheltenham is situated in a natural bowl.

This makes for stagnant air .

The lung disease and breathing difficulties of Cheltenham residents are well documented.

In the 1950s surgeons at Cheltenham Hospital would advise patients to recuperate by the sea.

Page 258

Add 70 years of diesel particulates at present and further mix in hundreds more vehicles idling their engines whilst they attempt to get on to a main road and you have a catastrophe on your hands.

Its difficult enough for Police, Fire Engines ,and Ambulances to get through the traffic to surrounding areas right now.

The situation with the traffic is appalling now - no-one in their right mind would want to exacerbate it .

Pedestrians are at risk when walking up and down Harp Hill ,especially if they have children and dogs with them .

Harp Hill is simply too dangerous - especially if two cars are going in different directions or a cyclist is on the road.
There is not the space.!

Did the destructive "Developers " not bother to walk up Hill ?

I sometimes walk to the supermarket using Harp Hill and often think Im taking my life in my hands and wonder where I could escape to -if a vehicle ,truck, or van, came too close .I sometimes cling on to hedges .

I never ever take my dog on that road -he hates the experience of speeding traffic as well.

Cheltenham is a beautiful place to live but sadly we have so many questionable buildings now -hastily put up without any thought for humans and animals or the beauty of Regency Architecture.

I do not see why we should let greedy thoughtless developers ruin our beautiful space.

We have lovely healthy animals in our area, deer, rabbits,foxes,owls (lots of them) frogs ,toads, newts,bats and beautiful birds.

In my garden ,I have protected species of Bats and Newts, further frogs, toads, foxes,and two deer. We have rare birds who migrate from Sweden every year, because the ponds and surrounding areas are perfect for them.

Sadly in the last ten years the toads have disappeared- due to pollution -we cannot afford to lose any more wildlife.

The wildlife and walks around Cheltenham are a joy, and I (and many others) would object vehemently to the destruction of our trees and protected species in fact I will not stop objecting to this until this absurd, ill thought out plan is scrapped entirely .

These access, traffic, pollution problems, destruction of naturally beautiful areas, are not going to magically disappear. in fact it will take a massive effort to reduce the present problems.

Why throw petrol on a bonfire?

Haytor
65 Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PR

Comments: 17th August 2020

I wish to strongly object to the proposal to build 250 houses on Oakley Farm Pasture Slopes off Harp Hill.

Firstly, the number of vehicles driving up and down Harp Hill will increase hugely, making it unsafe for people to walk. There are no footpaths near my house at the top of Harp Hill, but sometimes you can walk on the verges, however some houses do not have verges, forcing walkers into the road. This affects me, as I often go running and have to run on the road to get to the Battledown Estate or the fields near Aggs Hill and Mill Lane. I also take my dog for walks in the surrounding fields and walk into town - walking is the only option for me as I am not old enough to drive. I currently walk down Harp Hill to the bus stop to get to school and I am subjected to speeding vehicles both up and down the hill which is particularly dangerous around Hill Covert and Camp Road. In winter the verges are muddy and unsuitable for walking on. Adding 250 more households (and cars) with access accessed from Harp Hill would be extremely dangerous and make people's lives very difficult, getting to school and generally entering/leaving their homes.

Pedestrians will not be able to use the road if this application is permitted.

Secondly, the houses will be built on AONB land - a place designated for conservation due to its significant landscape value. 250 houses built on top of this will destroy the ecology and wildlife habitats forcing animals out of the area - this cannot be right. We all have a responsibility to protect our environment and planet, and destroying this protected greenspace would be counterintuitive. I have read in one of the application documents that the lower part of the site is not as sensitive as the upper part, which I feel is completely untrue. The site is covered in trees, particularly around the perimeter and along the internal hedges, and to fell trees to then replantreplace them with new ones seems an unnecessary and destructive act against nature.

Therefore, I ask that the council and the planning decision makers reject this planning application to protect our precious AONB and to ensure the community can continue to enjoy it.

2 Aylburton Road
Cheltenham
Gloucestershire
GL52 5FB

Comments: 9th August 2020

I recently bought a property next door to Oakley farm and one of the reasons I chose this area was that it was surrounded by farmland. I object to this planned site on the grounds

that it will spoil the landscape, reducing the vital green spaces that we have. It will also increase congestion and strain upon existing resources.

Tanglin
Oakley Road
Cheltenham
Gloucestershire
GL52 6NZ

Comments: 11th August 2020

I wish to OBJECT to the Oakley Farm Pastures application - 20/01069/OUT for development comprising of up to 250 residential dwellings.

I object on several grounds

- o this is an AONB and any application for development on such land should be rejected. This site can be viewed from many vantage points and building houses over these fields will destroy the habitat, ecology and beauty of yet another Cheltenham green space.
- o the Oakley Farm Pastures does not feature on the new and updated Cheltenham Plan approved on 20th July 2020 and should be rejected, as not complying with this plan.
- o traffic in Harp Hill is already at its maximum capacity. Information given out at the Community Engagement meeting on 26th July 2019 at the Cornerstone Centre on the results of traffic assessments was disingenuous to an extreme. I was told only 60 extra vehicles would be expected at the Harp Hill / Priors Road / Hales Road / Hewlett Road roundabouts in the rush hour (that itself would be sufficient to block these junctions) and that no traffic was expected to go left off the site into Greenway Lane.
- o there is no spare capacity within the Harp Hill area to cope with the potential of 1,000 extra vehicle movements per day, nor with the extra pressure for local amenities such as schools, GP surgeries, supermarkets and shops which 250 extra families will demand.

Woodmead
Bouncers Lane
Cheltenham
Gloucestershire
GL52 5JW

Comments: 17th September 2020

Many objections have been submitted to this planning application that refer to the impact on traffic in the immediate area. Given the highly unsuitable highway provision for traffic heading north then I also object.

The highways in the area are totally unsuitable as all traffic heading north (Prestbury, Evesham, Race Course, Winchcombe , Southam, Bishops Cleeve etc) is directed along Bouncers Lane. This is a minor local residential road with a primary school unsuited to through traffic Due to the signage and the deliberate blocking of the only other viable

route around Cheltenham (i.e. Barley Road) Bouncers Lane already has far too much traffic. The 60 home plus development at the Premier Products site will generate further traffic.

Further development on this side of Cheltenham must be held until the highways authority can build a proper road layout in this part of town.

1 Coleford Road
Cheltenham
Gloucestershire
GL52 5GR

Comments: 20th July 2020

The lower half of the estate is extremely congested with a lack of space for passing vehicles. My children also attend Glenfall primary school which would be more accessible from the top of harp hill.

4 Drybrook Walk
Cheltenham
Gloucestershire
GL52 5FR

Comments: 20th July 2020

How were they allowed to buy it given their obvious intentions? Beautiful areas like these can never be replaced or regained we need to help keep/save them. The deer, birds owls & such like are amazing to see & hear.

Plus the other problems of overcrowding issues. people can't live harmoniously when they are all on top of each other battling for space! 500 extra cars at the very minimum some houses are bound to be multiple occupancy!!

Also the utilities in this area are shocking the smells from drains are awful!!

20 Wessex Drive
Cheltenham
Gloucestershire
GL52 5AU

Comments: 28th July 2020

I am writing to formally object to the outline planning application for 250 dwellings on Land at Oakley Farm, Cheltenham. The principle of development on designated Areas of Outstanding Natural Beauty (AONB) should not be allowed and I do not believe that this highly sensitive site can accommodate this level of development. I request that Cheltenham Borough Council refuses permission for the reasons I have set out below.

1. Principle of Development.

The whole site is situated entirely within the designated Cotswold's Area of Outstanding Natural beauty (AONB). This is afforded the highest level of protection in planning policy terms and the National Planning Policy Framework (NPPF) states in paragraph 172 that

"Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues." The site forms a valuable green space and the topography of the site is a key notable component, rising up to the south and east and is therefore highly visible from the wider landscape setting and AONB as well as areas within the eastern part of Cheltenham.

The NPPF paragraph 172 further states that "The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest." I do not believe exceptional circumstances exist in this case and given the major nature of the development proposed I consider that the principle of development on the site is contrary to national planning policy and should therefore be refused.

Given recently Adopted Local Plan (July 2020), there are numerous other allocated strategic and housing sites and whilst there is a recognised national need for new housing, land that is afforded the highest level of protection such as this should be considered last. The Adopted Local Plan does not allocate this site for development and there are many other more suitable sites to ensure Cheltenham can provide the necessary housing supply within the Adopted Local Plan period. It would therefore be contrary to the recently Adopted Local Plan, the JCS and NPPF.

2. Impact on Landscape Character, Visual Amenity and Encroachment AONB.

This is a highly visible, undeveloped sloping parcel of land and important 'green finger' which allows the countryside and associated important wildlife corridors to penetrate into the built up area of eastern Cheltenham. The impact of developing the site and further encroachment into the countryside will result in unacceptable harm to landscape character and visual amenity, and permanent loss of AONB land.

In addition to national policy affording the highest level of protection to the application site, the Cheltenham Borough Council Landscape Character and Sensitivity Assessment of Cotswolds AONB (May 2016) has identified the site to be within the 'Oakley Farm Pasture Slopes Landscape Character Area', (LCA 7.1). The document notes the sloping topography and the wide, expansive open views to the north, medium to high tranquillity and the high quality pasture with mature parkland setting trees. The LCA summarises the site to have a 'high' visual sensitivity and a 'high' landscape character sensitivity resulting in a 'major' constraint, and therefore as having a 'low' capacity for built development. It is clear therefore in landscape character terms at a local level as well as national level, the site has been assessed as being entirely unsuitable for development.

Due to the topography and sloping nature of the site which rises some 47m in elevation from 78m AOD at the north western corner, up to 125m AOD at the south eastern corner, the site is highly visible with long, uninterrupted vistas out towards the wider AONB landscape as well as being clearly visible when viewed from the more elevated AONB landscape to the north and east. The site is seen as a notable green and undeveloped parcel of land when viewed from the existing surrounding built up areas including Harp Hill, Camp Road, Stanley Road, Priors Road, Hillview Road, Wessex Drive, Pillowell Close and Brockweir Road.

Views of the site as an undeveloped field are notable from the highly sensitive receptors such as the Cotswold Way Long Distance Route and key elevated locations such as

Cleeve Hill and Prestbury Hill to the north and east. New development on the site, rising up the sloping topography will be clearly visible as will the proposed access onto Harp Hill and will result in a high magnitude of change within these views extending the built up area beyond the perceived settlement edge. This cannot be mitigated for appropriately and will result in significant harm to these important views and high sensitivity receptors.

The Cotswolds AONB Management Plan 2018-2023 sets out the policies for the management of AONB land and has two primary key purposes - 1) To conserve and enhance the natural beauty of the Cotswolds AONB; and 2) To increase the understanding and enjoyment of the special qualities of the Cotswolds AONB. Clearly, this development proposal does not adhere to these key purposes and is contrary to a number of the policies within the AONB Management Plan, including CE1, CE3, CE4, CE7, CE11 and CE12.

The proposals are contrary to Policy D1 of the recently Adopted Local Plan (July 2020) as they do not complement or respect neighbouring development nor the character of the locality and landscape. In addition, they would be contrary Policy L1 of the Local Plan as the development would cause unacceptable harm to the setting of Cheltenham including views into or out of areas of acknowledged importance. The proposals are also considered to be contrary to Policy SD6 and SD7 of the JCS as they do not have regard to the local distinctiveness and by introducing 250 dwellings and associated infrastructure will not protect nor enhance landscape character. The long term detrimental effects of the development on the localised landscape and AONB land will not be mitigated for and will result in the permanent, irreversible loss of this important green space and encroachment of built development into the AONB and wider countryside.

3. Scale, Density & Over-development.

Notwithstanding the principle of development being contrary to national and local planning policy, the site also does not appear to have the capacity to support 250 dwellings and such I would object to the current proposals on the basis of scale, density and over-development. By restricting developable areas to the central and northern portion of the site, this appears to have resulted in a dense layout that does not reflect or respect its edge of settlement location nor the wider sensitive countryside. The dominance of roads as a result of an overly designed and convoluted vehicular access off Harp Hill and varied site topography means that an awkward layout has been produced that does not appear to have considered its landscape setting. The resulting scale and density of the proposals is therefore out of proportion to its context and should be of a much lower density and scale. Whilst the proposals suggest that development has been limited to the lowest parts of the site, proposed developable areas extend as far as the 118m AOD contour.

The layout also suggests that the protected TPO and Veteran trees are to be retained and incorporated within the layout. It is unclear however given the sloping topography of the site and the likely earthworks necessary to constructed 250 dwellings how this is possible without impacting the root protection areas of the protected trees. The topography and significant level changes of this site are a key component that characterises it, however developing two thirds of the land will inevitably require substantial earthworks which will transform the site. Page 30 of the Design and Access Statement also indicates the proposed housing will be set on a level area whilst the tree planting is on regraded landform. Clearly further detail on the earthworks strategy and cut and fill exercises would be necessary to demonstrate that these outline proposals are even feasible and that they take into account the landform and key features of the site.

4. Impact on Highways, Access and Transport.

The proposed access location is located part way along Harp Hill at the most elevated part of the site at approximately 122.5m AOD. The existing Harp Hill road is narrow and without any pedestrian footways at this point and the road network to the east consists of only minor rural lanes, many of which are single car width. At peak times all junctions in the vicinity are at capacity and I cannot see how the existing road network will therefore be able to support the additional traffic movement for 250 homes without significant offsite highways improvements.

The proposed access from Harp Hill and into the site appears to be an overly engineered design creating a convoluted access road through the portion of the site that is supposedly to be retained, protected and enhanced. The proposed layout also appears to show approximately 50m length of the existing mixed native hedgerow along Harp Hill to be removed to facilitate the access and associated visibility splays. I would question whether the visibility splays at this new junction are sufficient given the speed of vehicular movements on Harp Hill. I also question the need for pedestrian footway extending either side of the new road junction, however there is no existing or proposed footway to the north or south of Harp Hill. It is clear however that the loss of the existing mature hedgerow along the southern boundary and major infrastructure proposal located on this elevated and highly visible location within the AONB will not be possible to fully mitigate for in landscape and visual terms and will result in unacceptable visual harm.

In addition the proposed scheme suggests that access to the wider Public Right of Way network is to be enhanced - Page 27 of the Design and Access Statement "linking to long distance walking trails" ... "Forging footpath connections" and it uses images of the Cheltenham Circular Path and the Cotswold Way signage. This is clearly inaccurate as there is no footway along Harp Hill to the east, nor is one proposed as part of this scheme and development of the site will therefore not provide further links to the wider Public Right of Way network or improve access to the countryside.

Summary and Conclusion.

Given the points above I do not believe the site is suitable for development on this highly sensitive AONB landscape. The proposals for 250 dwellings would be contrary to national and local planning policy, including the recently Adopted Local Plan, and would result in significant and demonstrable harm to the key principles of the AONB. The permanent, irreversible loss of this important green space and encroachment of built development into the AONB and wider countryside is unacceptable. The access location and impact on highways infrastructure will also result in harm that cannot be appropriately mitigated for. I therefore request that Cheltenham Borough Council refuses planning permission for the reasons set out above.

Carobs
The Reddings
Cheltenham
Gloucestershire
GL51 6RL

Comments: 28th July 2020

We understand from local news reports that Robert Hitchens has applied to build 250 houses on land known as Oakley Farm Pastures. As this is an area of outstanding

natural beauty any application should have been deemed inadmissible. The house building allocation has already been agreed until 2030 according to the Cheltenham plan and yet new builds are being permitted in several areas around the town often involving green spaces and yet again eroding the Regency heritage for which it was once well known and respected. We strongly object to this application.

10 Hillview Road
Cheltenham
Gloucestershire
GL52 5AD

Comments: 20th March 2021

I strongly object to the 250 houses development at Oakley farm. This land is a beautiful green area of Cheltenham & I would like it kept this way for future generations.

36 Yorkley Road
Cheltenham
Gloucestershire
GL52 5FP

Comments: 14th December 2020

As a resident of Battledown Park I want to object to the this development going ahead. I'm retired and I have lived here for the past 11 years and have enjoyed this amazing landscape, while walking my dog along the footpath to Harp Hill and sitting enjoying the fauna and flora.

Such a peaceful place, it would be so sad not to have this wonderful setting to escape to and loose ourselves in. Quietly watching the deer and sheep grazing, listening to bird song and seeing fox cubs playing in the field has been a joy.

Something must be done to preserve this sanctuary and stop yet another area of outstanding beauty being destroyed by these developers, like the Persimmon development has done on the old GCHQ site, which is like a concrete jungle.

The traffic on our development is already causing us tremendous problems since Oakley Grange development was started and residents moved in. Cars are speeding at 30-40mph along Yorkley Road where I live, total ignoring the 20mph speed zone. To have 250 more dwellings on what is already a vast estate would be adding fuel to the fire and a danger to residents from the speeding traffic.

Extra traffic from this new development will also add to the problem of congestion near Sainsbury's Super Market. There will be more cars going in and out of the estate though one entry/exit, along with all the vast amount of Sainsbury's customers who use their car park, they will then converge onto the bottle neck at the traffic lights leading onto Priors Road, this will be a disaster and an accident waiting to happen.

Willow Bank
Harp Hill
Cheltenham
Gloucestershire
GL52 6PX

Comments: 28th July 2020

It is hard to believe that the council can grant permission to place access to this development on Harp Hill, when the applicants own transport assessment predicts it will produce traffic queues of up to 43 vehicles at the bottom of Harp Hill at peak AM times compared to just 2 today. That's over 200 meters of queueing traffic and well over the capacity of the junction.

The transport assessment shows that the council was spot on back in 1998 when it said (with respect to the development at GCHQ Oakley site) -

No more than 40 houses shall be served by the access onto Harp Hill at the east end of the site.

Reason: the road network in the locality is not capable of accommodating the traffic associated with more than this number of houses.

There is an inference drawn in the assessment based on the statement wording that this might have been referring to the network East of Harp Hill rather than Harp Hill itself but the modelling and the data show concretely otherwise.

The assessment suggests mitigation measures in the form of junction widening at the bottom of Harp Hill.

These mitigations and their projected impact seem to be highly speculative and do not build much confidence that they will remedy the situation to the extent predicted.

In addition, as noted in the assessment the widening would be in contradiction to the original intent to provide an improved pedestrian environment at this junction and that consultation would have to take place with GCC before it were agreed.

Without a clear and agreed mitigation option to solve the projected capacity issue at this junction I cannot see how permission can be granted at this stage to provide access to the development at Harp Hill.

Crai House
Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PX

Comments: 3rd August 2020

My main worry is about the traffic. I have no complaints about the area being built on. The amount of houses seems to me to be far too many to cope with the amount of traffic

on the hill. I am the first person to say people need homes but this number seems rather worrying.

I am not sure if you know Harp Hill, if you do you will know that the amount of vehicles using it every day is excessive. I did speak to a woman doing a survey of the traffic on the hill about 18 months ago and she said she had counted 1,000 vehicles in an hour. I must say that did surprise me, I am assuming this must be early morning.

My main worry is safety and that includes animals (we have had quite a lot of cats killed). We often see foxes and on occasions deer and badgers on the road here. The amount of vehicles that speed on the hill is ridiculous. It would be an idea for someone to come and monitor just how bad it is before a decision is made.

Another worry is that of Greenway Lane - Lane is the correct word for it. I just wonder how this lane would cope with all the extra traffic.

All rather worrying.

Rosemere House
Stanley Road
Cheltenham
Gloucestershire
GL52 6PB

Comments: 4th August 2020
Will increase pollution and traffic.

3 Hales Close
Cheltenham
Gloucestershire
GL52 6TE

Comments: 7th August 2020

I am writing to inform you that me and my wife object the planning which is set to go ahead. The reasons for this is because of traffic, flooding, fumes which are damaging our health, secondly the noise and the effects that this will have on the environment. Hales road and harp hill has already a lot of noise and traffic therefore this is going to cause huge congestion. The fumes from this damage have already caused black to be on our windows. This will cause a strain to our health and well being therefore we object this planning to go forward. You cannot even get across the road now from hales road due theory traffic, therefore if this planning goes a head this is going to cause greater problems.

I look forward to hearing back for more updates.

114 Hales Road
Cheltenham
Gloucestershire
GL52 6SU

Comments: 7th August 2020
Letter attached.

29A DownView
Chalford Hill
Stroud

Comments: 7th August 2020
Letter attached.

28 Slad Way
Cheltenham
Gloucestershire
GL52 5FA

Comments: 12th August 2020
I am a local to the proposed development and know the area well

The scale of the proposed development will bring long term traffic blight to an already high congested outdated road system- specifically the mini dual roundabout at the bottom of Harp Hill and the alternative but already speed restricted Greenway Lane

Living on the Oakley Grange Estate - the noise and general disruption from long term residential development is a considerable stress.

The locality itself is one that is best left alone and should remain as it is

114 Hewlett Road
Cheltenham
Gloucestershire
GL52 6AT

Comments: 5th March 2021
I am concerned that there is already too much traffic on Harp Hill. It is the main route up to the top of Cleeve Hill. The road surface is pretty poor and it is already very busy with cars, bikes and joggers at the weekends.

The fields provide essential green countryside for wildlife and it would be a great shame to lose this.

43 Fairford Road
Cheltenham
Gloucestershire
GL52 5FN

Comments: 13th April 2021

I'd like to put forward an objection to the 250 homes planned for Oakley by Robert Hitchens as I think the need doesn't outweigh the environmental impacts by any means.

Much has been said about the traffic issues which will certainly be a detriment, however I've had an industry professional (ex colleague) look at the Environmental documentation available online and as a result believe there is a good case to stop the development on this alone.

As a side note, my ex colleague did substantial work over many years with some geographically associated HRA work regarding bat species (Large Nuclear Infrastructure project) linked to this site.

Her main findings were:

- o Flight lines for bats between the proposed site and the Forest of Dean should at least be considered, particularly the 'Lesser Horseshoe' species. The Robert Hitchens HRA doesn't recognise this.
- o The 'Hedgerow' survey from a biodiversity and archaeological perspective may also be a weak area, subjects that she would expect to see in-depth for a green field site of this magnitude.
- o There was one big concern she stated regarding the Title page of the HRA - '.. they only look at the Beechwoods SAC, but incorrectly titled it as an SPA', and was indicative of the quality of the submission as a whole.

That was a very brief appraisal which she did for me and she hadn't had time to look through all the 108 documents in depth including the ES, so this should be regarded as a dip test, but it was a telling one. I could look into getting further information if it comes to it?

I am interested to know any thoughts on the above and the applicability regarding the current status with RH going to next tier?

35 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 6th August 2020

There seems no justification for developing such a substantial number of new properties in an AONB. It is very difficult to reach any conclusion other than that a development proposal of this scale will severely impact upon the environment and local wildlife in the area.

Harp Hill is not suitable for a development of this proposed scale. The proposal is likely to almost treble the number of houses seeking direct access to the road. The road itself is narrow with poor infrastructure for pedestrians or cyclists. It is in a poor state of repair, despite having been resurfaced in areas approximately 5 years ago. The reality of the transport options for most homeowners at the proposed development would be to drive, and the prospect of an additional 250 to 500 cars commuting (and almost certainly

queuing) along this particular stretch is going to substantially increase localised pollution levels.

15 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 31st July 2020

I would like to object to further development and houses being built on the Oakley farm pastures. We moved to this area from Bristol to improve the quality of air and life. The green pastures and paths have provided us with country walks, less traffic and to live alongside country animals. It is our source of connection with nature and would be a shame to affect not only the people who live nearby and object but also the wildlife.

13 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 5th August 2020

The wildlife will take a major hit if this development goes ahead. They've already taken a hit with many other projects that have either started or are on the horizon. THIS MUST STOP!!!

33 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 3rd August 2020

1. The proposed housing development will destroy the natural landscape which is much appreciated and has been enjoyed by the wider community.
2. The building development will destroy the wildlife habitat.
3. Harp Hill is a narrow road with narrow or no pavement which cannot cope with any extra traffic and any increase in traffic will pose a danger to walkers/cyclists and create traffic chaos in rush hours.
4. The local amenities cannot cope with the additional residents.

17 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 29th July 2020

Area of outstanding natural beauty. Area will be too congested. Too many houses too many vehicles accessing off a steep narrow hill

19 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 5th August 2020

Harp hill and the nearby roads already have more traffic than is safe and an additional 250 house will bring in the region of 500 extra cars to the local area. Harp hill is a residential area with parked cars on both sides which means cars have to stop and start and often speed or overtake recklessly because they become frustrated. Access at the bottom of harp hill is regularly jammed up and it is difficult to turn in and out of harp hill due to the number of parked cars in the vicinity. At the top of harp hill and round to aggs hill and the greenway there is no footpath and these winding lanes are treacherous with pedestrians, dog walkers, runners, cyclists, cars and lorries all trying to navigate their way through lanes that are narrow and with several sharp Bends - I see near misses almost every day when I use these roads. The lower Oakley grange estate has been extremely poorly planned with inadequate parking, no road markings, and footpaths that stop and start. Cars speed up and down the roads; cars park on the verges and I the roads; pedestrians are forced to walk in the roads as there are sections with no footpaths. Children and pets are at risk in these conditions and even as an adult pedestrian I regularly feel at risk from vehicles when I'm walking up and down the hill to access Sainsbury's from Birdlip road.

Overall the current traffic in the area is already a problem and conditions are unsafe for pedestrians and motorists alike. I have serious concerns about adding pressure to this local traffic.

Furthermore the proposed site is a designated area of outstanding natural beauty And not part of the areas planned for development - therefore when we bought our property it was on the understanding that this land would not be subject to development. There has already been considerable other development in this part of Cheltenham and part of the assurances given by the council was that the remaining green spaces would be left undeveloped.

29 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 6th August 2020

I wish to object to the planning permission for the building of 250 houses on Harp hill for the following reasons.

1. This area is a green field site in an AONB and although it is situated next to another new build site (Oakley Grange) this site was built on brown field land previously occupied by GCHQ. As the proposed site is in an elevated position it is visible from much of Cheltenham, once this site is built on the land will be gone for ever. We are lucky to have so much beautiful countryside on our doorstep and I'm sure that most residents of Cheltenham would be in agreement that the views of Cleeve hill are indeed spectacular and make our town such a pleasant place to live. To lose this green field space is entirely

unnecessary when there is so much space available that isn't in such a prominent position.

2. Harp hill is a steep road and very narrow in places making passing more dangerous than normal. This increase in traffic will only add to this problem. Harp hill is used regularly as a cut through from the B4075 to the A40 and the road is in a state of disrepair. Adding to the traffic volume will only exacerbate the poor road condition, particularly during the construction phase when heavy lorries will be trying to get up the steep gradient.

3. Having viewed the proposed plans the entrance to this new estate is situated just after a blind summit at the top of a steep gradient. This gradient causes a lot of drivers to drive quicker than normal to prevent their cars from stalling on the steep hill adding to this danger of cars pulling out of the new estate onto Harp hill and the risk of collision increases substantially. Each of the 250 houses will have at least 1 car and most likely 2 which will add to the problem.

3. There are no pedestrian pavements in parts of Harp hill making the road a particularly dangerous place on this popular walking route. Cleeve hill has always been popular for walkers to get such incredible views from the top reaching all the way to the Malvern hills and beyond. Harp hill is the main thoroughfare for walkers to reach designated trails away from the road but has substandard pavements to support the foot traffic. With the advent of lockdown and COVID pandemic more and more families have been using this route to access Cleeve Hill and it is becoming more and more dangerous with pedestrians as the flow of traffic increases. When you consider that each of the new houses will likely have at least one car per household, and most likely two the traffic increase will add to this problem.

I object to this proposal and I hope that the planning committee turn down the application on the grounds that we will be destroying parts of a limited AONB that we will never get back. That Harp hill will not support the increased traffic volume and is already straining under the current volumes of traffic and that the new development will present an even bigger danger to pedestrians using this popular walking route.

27 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 31st July 2020

With regards to the above proposed planning of 250 new homes, I would like to object to this proposal as I feel that it will have a negative impact on the wildlife that we currently have in the area, we'll lose the cherished countryside, the traffic caused on the roads will be horrendous all the time and it's going to have an adverse impact on the views currently enjoyed from Cleeve common.

23 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 6th August 2020

Harp Hill is already used by more traffic than it was designed for. I have experienced a number of 'near misses' an additional 250 houses, potentially 500+ vehicles will exacerbate the issue. There has already been enough building in the area, this proposed site should be left as it is as a green space for the wildlife. Local amenities such as schools and nurseries in the local area are already over subscribed or are having to reduce their catchment areas.

20 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 5th August 2020

I object to the proposed development of this land for the following reasons.

The area is an area of outstanding natural beauty and should be preserved as such.

The local wildlife will be decimated by being forced to relocate. This will be a loss forever of a valuable piece of countryside.

The road is not able to cope with the extra traffic. The condition of Harp Hill is already atrocious and the building site traffic will make this worse.

The junction proposed for Harp Hill will be dangerous ,visibility is poor.

The road and surrounding area is popular with walkers and cyclists and there are frequent near misses where traffic is speeding or cars take corners too wide. This will be exacerbated by extra traffic from housing causing traffic jams as cars try to exit on to Hales road/Priors road junction.

The traffic at rush hour/school run times is heavy along Greenway lane causing long delays at the traffic lights with London rd,

I believe that there are less sensitive areas that should be considered before this valuable public space is lost forever.

22 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 5th August 2020

This will cause too much traffic on an already very busy harp hill and the impact on the local wildlife will be devastating, both in terms of the increase in traffic and loss of green space.

18 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 1st August 2020

I came to know that there is a proposal to build more than 250 houses on the Oakley Farm Pasture Slops (Planning ref No 20/01069/OUT). I would like to appeal you all for not allowing this project to be approved as I am a local resident living at 18 Birdlip Road GL525AJ and I have the following concerns with this project.

1. No walk path on Harp Hill : My 2 kids study in the local secondary school and they walk to the nearest bus stop on Hales road via Aggs Hill and Harp Hill. As there are no walk path they find it at times a great risk to walk on these roads. Having this new development will make it still more difficult for pedestrians as there will be more traffic on the narrow Harp Hill road.

2. Traffic Jam on narrow Harp Hill : If this proposal is approved, then there will be traffic jam on narrow harp hill road each morning and afternoon as more cars will be clogging up my work/school/shopping run. This iss unacceptable as I want to enjoy living in my house not getting caught in traffic every day during rush hours.

3. The proposed area is a area of outstanding natural beauty. When I moved to my current address, I use to see so many varieties of wild life. But over the past 2 years its been declining. Having another massive project in this area will completely destroy the natural habitat.

4. The local countryside will be lost for ever.

5. Forced relocation of wildlife.

6. Further pressure on valuable local amenities.

I kindly request you all to consider the adverse effect this project will have on the local community and on the natural habitat. Hence I kindly request you NOT TO ALLOW this project to be approved.

16 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 5th August 2020

1. This is an AONB and development here sets a dangerous precedent for destroying our countryside. It will ruin the character of the area.

2. There is no public transport servicing this area. The council have already allowed to much development to go ahead in this area with no access for buses or extra services (climate emergency?)

3. Harp Hill is increasingly busy and dangerous to drive on. It is even more dangerous for pedestrians. What improvements for drivers and pedestrians will be made to handle the extra traffic and pedestrians.
4. Additional works traffic will cause more damage to roads. Will the developer be making weekly repairs?
5. A complete development of 250 houses will overwhelm the roads with traffic at peak times.
6. If sufficient extra school, doctor, dental and police services are not put in place this will create unacceptable pressure on local services.
7. Local parks and green space are increasingly crowded. Any development should have at least a new reasonably sized park included.
8. The local deer population are already being squeezed out. This development will be bad for wildlife.
9. Very concerned about the amount of dust and pollution residents will have to suffer during this development due to its elevation over estate.

14 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 3rd August 2020

1 - It is an AONB, so surely no further discussion is necessary. If building can be done here, then no AONB can be safe, NONE.

2 - I read from a previous comment that the land was sold with a caveat that it cannot be built on. Surely law is on our side.

3 - The extra traffic on Harp Hill and Greenway Lane of between 200 and 700 extra vehicles will make the narrow, pavementless roads a nightmare. Let alone the degradation of the roads, which are awful (Harp Hill).

10 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 5th August 2020

I object to this development as follows:

Harp Hill is already a busy single lane road road which is badly maintained and used as a cut through to Charlton Kings so already it can be a rat run. In parts if there are cars parked outside homes then it reduces to a single lane. If 250 homes are built then this will significantly increase traffic on this road and cause it to be grid locked and more

dangerous then ever. Cars coming down the hill often have to slam on their brakes when there is a car coming up the hill.

At the bottom of the hill there are 2 mini roundabouts which are already busy and again, this would cause further gridlock at the junction of Hales Road, Priors Road and Hewlett Road.

There is already too much development with the Persimmon site in this area.

Battledown is supposed to be Cheltenham's premier residential area and this should be maintained rather than ruin the appeal of the locality.

12 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 5th August 2020

I object as I'm very concerned about the effect of more traffic on Harp Hill and the surrounding roads and further to this, the effect on the wildlife and loss of beautiful AONB countryside

11 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 31st July 2020

This is to strongly object the planning application for 250 dwellings on Land at Oakley Farm, Cheltenham. Please see below the reasons why I feel it is not right to go ahead with this development and you should not entertain the application and deny it at this stage only.

1. This is an inappropriate development in an AONB
2. Too much traffic already on Harp Hill which is already in very poor condition with deep pot holes.
3. With no pavements at many places on Harp Hill, it's anyway a nightmare for pedestrians. With increased traffic we are just a step away from some terrible accident and possibly loss of life.
4. There is an abundance of wildlife. I have seen foxes, deer, boars behind my house. With this new development, they will be losing their home and we will sadly miss them.

9 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 29th July 2020

I object to this application in relation to the increased traffic levels that this application would create on Harp Hill and Greenway Lane which is currently too high. The roads around this area were not designed for the current volume of traffic and to add an additional 250 homes would be disastrous.

1 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 5th August 2020

I wish to formally make an objection against the proposal for 250 new homes to be placed on the Oakley Farm land.

Harp Hill is already a dangerous road, with traffic going too fast up and down hill, the pavements are very narrow (no pavement in some areas), and because of the incline a popular cycle route for road bikes. The road is always in a bad state of repair because of the rain fall and the construction traffic, this will only worsen with the new homes.

Schools!! where do you propose all the children living on this new estate will go to school? There is already problems with children not being able to get into their catchment area school, this will be even more difficult with more children wanting the same school. The farm land is home for lots of natural wildlife, an area of outstanding beauty that can be seen from the views of Cleeve Hill. This area does not need any more houses ruining what natural beauty there is left.

10 Humber Road
Cheltenham
Gloucestershire
GL52 5PE

Comments: 17th July 2020

Aonb- think it's obvious, it would be of great negative consequence to the natural environment for a start. Building here is not essential. Local infrastructure cannot support more houses here. I do not support this and object on every level.

Yew Tree House
9 High Street
Prestbury Cheltenham
Gloucestershire
GL52 3AR

Comments: 26th January 2021

I am writing to object to the above application.

Many compelling and cogent objections have already been made to this outline application and for very good reasons. In particular, the Council for the Protection for Rural England (CPRE) and the Friends of Oakley Farm Pastures Slopes (FOFPS) have written most pertinently and eloquently in their comments and objections. I should like to endorse these objections and rather than repeat them all in other terms I should like to summarise my main objections as follows.

1. The site is a designated Area of Outstanding Beauty. If that entity is to mean anything then the terms 'Area', 'Outstanding', 'Natural' and 'Beauty' need to be properly emphasised and appreciated. There is no justification in replacing here or elsewhere an AONB with a development such as that proposed. Such changes tend to be irreparable.

2. Although human experts can point to irreversible human damage, wildlife cannot be consulted about the irrevocable loss of their precious natural habitat. The proposal for up to 250 human habitations would inevitably affect wildlife in the area adversely and irreplaceably for the worse.

3. Building up to 250 dwellings on a limited space would do nothing to improve the look of what is in effect an outstandingly attractive piece of countryside within the town and in clear sight of Cheltenham and its Circular walk. The term development itself is a relatively neutral word and others may see the proposal in other terms.

4. If the development were to be allowed, then there would be yet further and serious traffic congestion on Harp Hill, Greenway Lane and Prior's Road at least. The proposed exit from the estate onto Harp Hill looks utterly inadequate and intrusive and pedestrians on Harp Hill are already remarkably ill-served. Greenway Lane/Harp Hill has already become a short-cut and 'rat-run' for traffic travelling to and from the A40. The proposed development would only make matters much worse.

5. Up to 250 new dwellings would add very considerably to pressure on local amenities, such as schools, health centres, doctors, shops, etc.

6. As someone who has lived in Cheltenham from 1974 to 1993 and returned to live in Prestbury from 2010, I object most emphatically to the prospect of up to 250 residential dwellings on the site. One of the significant and regrettable changes we have noticed to the town over time has been the relatively rapid development of urban and suburban sprawl visible both in the town itself and from the escarpment and surrounding hills. This proposed development would remove yet another valued space in what is, and should remain in perpetuity, an area of outstanding natural beauty. Put that term in capitals AONB and it should also have legally protected status which the present application, if approved, could only erode.

7. If this AONB were to be compromised, then it would set a precedent for others to become similarly at risk.

8. Any persons, firm or company fortunate enough to purchase or own such a designated Area of Outstanding Natural Beauty should surely have a duty to maintain it as stewards for posterity.

33 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 3rd August 2020

1. The proposed housing development will destroy the natural landscape which is much appreciated and has been enjoyed by the wider community.
2. The building development will destroy the wildlife habitat.
3. Harp Hill is a narrow road with narrow or no pavement which cannot cope with any extra traffic and any increase in traffic will pose a danger to walkers/cyclists and create traffic chaos in rush hours.
4. The local amenities cannot cope with the additional residents.

Merton House
6A The Avenue
Cheltenham
Gloucestershire
GL53 9BJ

Comments: 5th August 2020

Whilst it is important to provide housing, it is also important to plan developments appropriately, taking account of both housing need and the impact on the existing community. The desire to profit by obtaining planning permission is understandable but not a reason for planning permission to be granted.

I object to this development because it would build on an Area of Outstanding Natural Beauty to the detriment of all the residents of Cheltenham. There is no need for the housing as Cheltenham has a plan to build 11,500 more houses by 2031 and so these additional houses are not needed and are in the wrong place.

The development of the old GCHQ site at Oakley has already provided a substantial number of homes over the last decade and the development is not finished. When complete there will be over 730 new homes on the site in addition to the Sainsburys supermarket. This is more than enough extra homes for the local infrastructure to cope with.

5 Morningside Close
Prestbury
Cheltenham
Gloucestershire
GL52 3BY

Comments: 6th August 2020

I wish to strongly object to the proposed building of 250 homes in an area of outstanding natural beauty, in line with others a few the reasons are:

This is an ANOB and should not be developed for housing, it would be a disaster for wildlife and air quality.

Infrastructure is already poor and cannot support this many new dwellings.

Harp Hill is a 'rat run' for motor vehicles and dangerous for cyclists & walkers like myself. This is in complete contrast to the Government's latest talk of improving towns & cities cycling & walking infrastructure. Instead of increasing the traffic on Harp Hill it should have a segregated cycle lane, be 20mph and have large vehicles restricted.

Redstart House
Battledown Approach
Cheltenham
Gloucestershire
GL52 6RE

Comments: 8th August 2020

I object strongly to this application on several different grounds: when I moved with my family to Cheltenham 7 years ago, one of the reasons we chose to live here was the beauty of the surrounding landscape protected, or so we thought, by the AONB status of land east of Cheltenham.

If this goes ahead, it will be putting a coach and horses through the whole concept of AONBs. Furthermore, the amount of traffic generated on Harp Hill will of course escalate, onto a road which has no footpath. At present it is just about bearable to walk or run along the upper end of Harp Hill but this proposal would certainly make it hazardous.

Finally, we enjoy using the footpath on the western perimeter of this site mainly because of the views of the escarpment but clearly any major development like this would completely destroy this amenity.

Wessex House
3 Sovereign View
Cheltenham
Gloucestershire
GL52 6FD

Comments: 9th December 2020

I'm at a loss as to how a developer can argue that the minor road that is Harp Hill, could accommodate increased traffic and dismiss the further chaos that would ensue where it meets with Hales Road and Hewlett Road. Harp Hill is already a busy road and increasing the volume of traffic on such a minor road will only add further to the congestion. In addition given that the application is to build on land that is designated AONB, surely planning officers will realise that it is counter intuitive to construct houses on land that should be protected for future generations to enjoy. Finally, and as significantly, The Local Plan for Cheltenham that was only adopted in July 2020 at a full

council meeting of CBC, does not set aside this land for development. Nothing has changed and I would urge Councillors to stand up & speak out against this application.

Hewlett Reservoir
Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PP

Comments: 29th July 2020

I strongly object to the proposed housing development at Oakley Farm. This land is designated as an AONB site and therefore should be protected for that reason. I have lived adjacent to this land for over thirty years and have seen a huge increase in traffic using Harp Hill. This development will only increase to the volume of vehicles already using this road.

There have already been large developments built in this area over recent years and the impact of this proposal will also put more pressure on the wildlife in the surrounding area.

The Oaks
Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PR

Comments: 30th July 2020

I write to voice my strong objection to the above planning application. There are numerous material objection points which are considered a reserved matter - for example, the AONB designation; design; site layout. The main focus of this objection is on that which is not reserved - the proposed access / egress within and around the proposed development site from Harp Hill. It is therefore requested that the Authority fully consider the implications of the proposed access / egress from Harp Hill and refuse this application accordingly.

National Planning Policy

NPPF

The NPPF (National Planning Policy Framework) is the guiding policy that all applications should have as the principle policy guiding development. The following from the NPPF is therefore pertinent in this case:

Section 9: Promoting sustainable transport

P.102. Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

The access proposed has not sufficiently considered the patterns of movement in and around the site. There is very significant potential for dangerous conflicts of movement between pedestrians, cyclists, horses and motorists and the proposed design of access will result in a poor quality place due to inadequate infrastructure.

P.108. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be - or have been - taken up, given the type of development and its location;
- b) safe and suitable access to the site can be achieved for all users; and
- c) any significant impact from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

Safe access cannot be sufficiently attained at this site and it is certainly arguable that the proposed development would result in a severe and significant impact upon the local road network as a consequence of the high frequency and volume use of Harp Hill as a major access / egress point for the development.

P.110. Within this context, application for development should:

- c) Create places that are safe, secure and attractive - which minimise scope for conflicts between pedestrians, cyclists and vehicles.

The proposed access and exit points, as well as the internal layout of the site, will increase potential conflicts of movements between motorists, cyclists, and pedestrians to an unacceptable level.

Section 12: Achieving well-designed places

P.124. The creation of high quality buildings and places is fundamental to what the planning and development process should achieve.

P.127. Planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting.
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.

P.130. Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary documents.

The proposed access and development will contradict the above National planning policy.

The National Design Guide

The National Design Guide was published in October 2019 and includes guiding policy concerning design for development. The following is relevant and relates to movement and accessibility in and around the site;

Context

C1: Understand and relate well to the site, its local and wider context

40. Well-designed new development responds positively to the features of the site itself and the surrounding context beyond the site boundary. It enhances positive qualities and improves negative ones. Some features are physical, including:

- The existing built development, including layout form, scale, appearance, details, and materials;
- Access, movement and accessibility;
- Views inwards and outwards

41. Well-designed development proposals are shaped by an understanding of the context that identifies opportunities for design as well as constraints upon it. This is proportionate to the nature, size and sensitivity of the site and proposal.

42. Well-designed new development is integrated into its wider surroundings, physically, socially and visually. It is carefully sited and designed, and is demonstrably based on an understanding of the existing situation.

This further casts doubt as to the suitability of the proposed access and the subsequent potential for poor quality development / design.

Local Planning Policy

The Joint Core Strategy

The JCS was adopted by the three local authorities of Gloucester City Council, Cheltenham Borough Council, and Tewkesbury Borough Council. As such the following policy applies and is relevant to this planning application.

Policy SD4: Design Requirements

i. Context, Character and Sense of Place;

New development should respond positively to, and respect the character of, the site and its surroundings...and addressing the urban structure and grain of the locality in terms of street pattern, layout, mass and form.

ii. Legibility and Identity

New development should create clear and logical layouts that create and contribute to a strong and distinctive identity and which are easy to understand and navigate.

v. Safety and security

New development should be designed to contribute to safe communities including reducing the risk of fire, conflicts between traffic and cyclists or pedestrians, and the likelihood and fear of crime.

vii. Movement and connectivity;

New development should be designed to integrate, where appropriate, with existing development, and prioritise movement by sustainable transport modes, both through the application of legible connections to the wider movement network...it should:

- Be well integrated with the movement network within and beyond the development itself
- Provide safe and legible connections to the existing walking, cycling and public transport networks
- Ensure accessibility to local services for pedestrians and cyclists and those using public transport

- Ensure links to green infrastructure
- Incorporate, where feasible, facilities for charging plug-in and other ultra-low emission vehicles
- Be fully consistent with guidance, including that relating to parking provision, set out in the Manual for Gloucestershire Streets and other relevant guidance documents in force at the time.

Policy INF1: Transport Network

1. Developers should provide safe and accessible connections to the transport network to enable travel choice for residents and commuters. All proposals should ensure that:
 - i. Safe and efficient access to the highway network is provided for all transport modes;
 - ii. Connections are provided, where appropriate, to existing walking, cycling and passenger transport networks and should be designed to encourage maximum potential use;
 - iii. All opportunities are identified and taken, where appropriate, to extend and / or modify existing walking, cycling and public transport networks and links, to ensure that credible travel choices are provided by sustainable modes.

5.2.7 The desired outcome from all development remains a safe and efficient transport network where people feel safe and they have a reasonable variety of travel choices.

The proposed access from Harp Hill is woefully inadequate for the scale of the development proposed. Considering that most families likely have at least one motor vehicle - often two (not including any visitors and their vehicles) - Harp Hill will be unable to sustain the increased traffic levels. Thus safety, site legibility and patterns of movement for all users in and around the site will be dangerous and the above local planning policy will not be complied with.

It should also be noted, as mentioned within the applicant's transport statement, that the site is not allocated within the Strategic Allocations Policy. This further questions suitability of this site and proposed access for a development of this scale.

Gloucestershire's Local Transport Plan (2015-2031)

The following from the Gloucestershire Local Transport Plan is contradicted by the proposed access and development here.

Policy Document 2 Cycling

LTP PD 2.1 To ensure that developers assess the needs of all pedestrians and cyclists within their development design and any improvements associated with the development. The access proposed from Harp Hill will be detrimental / dangerous to pedestrians, particularly given the lack of pedestrianised pavement. Cycling will also be difficult due to the increased traffic levels.

Policy Document 4 Highways

LTP PD 4.6. To consider the needs of all road users including walking and cycling when amending highway speeds to ensure safety, functionality and consistency are not compromised. To work with developers and transport scheme promoters to consider, when designing new schemes, factors which influence the success of routes and facilities in terms of their use and function, such as layout, visibility, gradient, lighting, natural surveillance, integration and signing.

Given the potential for dangerous conflicts of movement between motorists, cyclists and pedestrians, the needs of all road users will not be met using the proposed access / egress from Harp Hill.

LTP PD 4.8. GCC will work with all transport providers to provide a safe, reliable and efficient highway network that encourages pedestrian movements and provides vital walking connections between communities, employment and services.

Similarly, this policy will not be met / complied with.

Relevant Local Planning Applications & Appeals

The following planning applications are believed to be relevant to this application;

- Planning Application 18/02171/OUT - Outline application for residential development of up to 69 dwellings including access, layout and scale, with all other matters reserved for future consideration (revised scheme following refusal of application ref. 17/00710/OUT) | Land Adjacent To Oakhurst Rise Cheltenham Gloucestershire and subsequent Appeal APP/B1605/W/19/3227293 - Refused and Dismissed

This application, dismissed on appeal, was for similar developments and dismissed for numerous reasons including issues concerning access and landscape and visual impact.

Planning Application CB11954/43 (The Eden Villas Development) outlined that the road network was not capable of accommodating the traffic associated with more than this number (i.e. 40) of houses. As such, a proposal of the scale suggested here - 250 dwellings - will not have sufficient infrastructure and capability for safe and effective access / egress from Harp Hill.

Material Planning Considerations

Access: Safety Considerations for all users

Regardless of what has been stipulated within the documents submitted, there is local residents have existing knowledge / understand that Harp Hill is already a problematic road due to high levels of commuting / school traffic. The additional requirements placed on the road by an additional 250 dwellings will exacerbate these existing problems to an unacceptable and dangerous level. Local extensive experiences of excessive speed and near miss traffic incidents between pedestrians and vehicles, vehicles and vehicles require a more extensive and detailed traffic analysis be made on Harp Hill before a fatality is suffered. Whilst circumstantial and normally not considered by planning policy it should not take a fatality before it becomes a factual element.

Emergency access for ambulances / fire engine vehicles has not been sufficiently considered by the applicant.

Harp Hill

The proposed use of Harp Hill is wholly unsuitable for the proposed large scale housing development. The road is already at capacity and residents already experience problems of congestion and conflicts of movement between motorists and cyclists / pedestrians. Documentation submitted by the applicant has indicated that Harp Hill is a significant site constraint and as such should not be considered as a suitable access / egress road for the scale of development proposed.

There is also no analysis made on the extended surrounding area traffic issues, for example, the access from Greenway Lane onto the Oxford Road A40 that would be substantially impacted by an additional 500 vehicles attempting to leave the proposed development location.

Other Considerations

Invalid Site Location Plan

The Site Location Plan submitted has included land that is not within the applicant's ownership - this being the area which includes a small section of the highway (named Priors Road (the B4075)). A valid site location plan therefore ought to be submitted by the applicant prior to any further consideration of this application. The Design and Access statement also utilises this invalid site location plan.

Documents submitted

Planning Statement

The following from the Planning Statement needs addressing.

"It cannot come forward as an allocated site as by its scale it is not a strategic site and the JCS only makes provision for strategic sites"

The suitability of the site is therefore questionable given that it has not been allocated as a strategic site. The JCS should still be considered concerning design and transport requirements for new development and should not be dismissed so lightly.

"7.27. 'The layout of the site responds to the topography and will improve accessibility to the countryside whilst reliving pressure on other areas in the AONB'"

Improving accessibility to the countryside should also include consideration of increased traffic and potential for conflicts of movement between different road users accessing the AONB.

Design and Access Statement

Similarly, the following from the Design and Access statement needs addressing.

"It is concluded that with the implementation of the mitigation and enhancement measures outlined, including the Interim Residential Travel Plan aimed at encouraging travel by sustainable modes, the additional travel by sustainable modes, the additional traffic demand would be safely and satisfactorily accommodated on the local transport network".

This is simply not the case - the Transport Statement admits that there is no provision on the majority of Harp Hill for pedestrian footpaths. As such this again strongly suggests that Harp Hill cannot accommodate sustainable transport / additional vehicles safely on the local transport network.

Environmental Non-Technical Summary

This summary mentions that access from Harp Hill is a significant site constraint. Again, this supports the argument that access from Harp Hill is not suitable for the proposed development.

AONB Designation

Whilst this is an Outline application with all matters reserved aside from access, it should be emphasised that the site is located within the Cotswolds AONB and as such the proposed development will have an irreversible adverse impact upon this AONB.

Summary

I trust that the above has demonstrated to the Local Authority that the proposed access for a development of this scale is woefully inadequate, would result in significant harmful impact to existing and future users and is poorly designed. It is therefore respectfully requested that this application be refused by the Authority.

High View
Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PR

Comments: 5th August 2020

We write to make clear our objection to the proposed development by Robert Hitchins Ltd at Oakley Farm Pasture Slopes. The application is for approval in principle for 250 dwellings (with matters of detail reserved) plus specific approval for the site's sole access road from Harp Hill. Our objection is on multiple grounds:

1. Cotswold Area of Outstanding Natural Beauty

The proposed development is on a largely Greenfield site within the Cotswold AONB, and as such is subject to the same protections as a National Park. The boundaries of the AONB were not arrived at randomly but after careful consideration and consultation, which concluded that these pasture slopes should be included: they contribute greatly to the aesthetics of Cheltenham, and act as a haven for wildlife. There are no grounds for reversing these views. Just 0.5% of the Cotswold AONB is situated within Cheltenham Borough and it would be a shocking indictment of Cheltenham Borough Council if it were unable to protect even this tiny slice of Britain's rural heritage.

In early August 2020, the Government brought forward proposals to facilitate quicker approval for planning applications through a presumption of approval. It is notable, however, that the proposed reforms will release building rights anywhere OUTSIDE existing national parks and areas of outstanding natural beauty. Again, it would be unconscionable for CBC to approve a large-scale development within the AONB when even these most radical Government reforms to planning policy still recognise that it is vital to protect the AONB.

The applicant's claims that building on this scale within the AONB will in some way "enhance" the AONB is of course risible and serves only to underline the desperate weakness of the application.

2. Development Should Be Planning Led

It is an established and fundamental principle that development should be planning-led, so that the broader implications of major developments (e.g. impact on local infrastructure) can be fully considered. Cheltenham has undertaken a detailed planning process, both for its Local Plan and as part of the Joint Core Strategy. The land at Oakley Farm Pasture Slopes has not been included within these plans and should not now be retrospectively considered for development on an ad hoc basis, given the inevitable negative implications (see point 4 below).

3. Outcome of Previous Assessment of this Land

In April 2015, CBC published an independently conducted study entitled

"Landscape Character, Sensitivity and Capacity Assessment of Cotswold AONB Within Cheltenham Borough Administrative Area".

In respect of the Oakley Farm Pasture Slopes, this study concluded that there were MAJOR landscape constraints to development and LOW landscape capacity for built development. The study concluded with the statement that:

"The findings within this study has concluded that there is limited capacity for built development along urban edge of Cheltenham, however Table 8 has identified a number of possible locations that would have less impact on the landscape character and with robust mitigation could accommodate appropriate development".

Table 8 identified five possible locations for development but EXCLUDED Oakley Farm Pasture Slopes. There can be no reason to think that the grounds for this assessment have changed within the intervening five years.

4. Stress on Local Amenities

Approximately 500 - 1,000 new residents in the area would place additional stress on local amenities for which the developer makes no allowance - and given that this development is outside of the local development plan, no other provision is planned. So local schools, which are already over subscribed, will become more so; local medical facilities (doctors, dentists etc.) already commonly have waits of several weeks for appointments - these will get longer. There is only one substantial supermarket in the whole of east Cheltenham (Sainsbury's Oakley) and it is already crowded at peak times - it will get worse. Recycling facilities at Sainsbury's, Charlton King's car park, the Robins' football ground, etc. are often found to be full - they will be so sooner and more often. And so on.

5. Redevelop Not New Build

The applicant argues that development of this site will provide jobs at a time when Covid-19 is causing unemployment. While we have yet to see the full economic impact of Covid-19, there can no doubt that it will result in the closure of many commercial and retail businesses within Cheltenham. There will be plenty of opportunities for developers to focus on redeveloping these Brownfield sites for residential purposes rather than building on irreplaceable Greenfield sites.

6. Harp Hill Traffic Capacity

Harp Hill is already an extremely busy road relative to its capacity with large volumes of traffic, particularly at morning and evening peak times. It is used as a significant commuter and school run route between east/south Cheltenham and north/west Cheltenham, to avoid the only real alternative of London Road/Hales Road, with its busy crossroads. This already results in significant congestion at the Harp Hill/Priors Road and Greenway Lane/London Road junctions, exacerbated by the need for local residents and business visitors to park on road near these junctions.

Harp Hill is a road with several very narrow points, a significant gradient for part of its length, and no footpath along the upper stretch. Sight lines along the road for entry/exit from many of the houses are limited. However, there is significant use by: motorised vehicles (including HGVs), very often travelling above the 30 mph speed limit; recreational cyclists (for whom it is a key route out of east Cheltenham and who regard Agg's Hill as an inviting challenge); walkers/pedestrians accessing the AONB where it joins to Cheltenham; and, regularly, horses. There is already frequent and significant conflict between these various types of user - motorists frustrated by slow moving cyclists on the hill, pedestrians in the road and so on. As a resident I have several times been involved in confrontation with motorists who have stopped to remonstrate with me for walking on the road near my own home despite there being no footpath!

The addition of up to 250 homes with access to/from Harp Hill implies a very large number of additional traffic movements per day. This would hugely exacerbate the existing problems and given the topography there would appear to be very limited options to mitigate this.

It is worth mentioning that at the public consultation into this development, one of the developer's representatives admitted to me that access via Harp Hill was far from ideal given its many problems and challenges, but that their preferred route, from Prior's Road along the existing Oakley Farm track to the side of Sainsbury's, was simply too narrow for a development of this scale.

7. Disruption to Local Residents

Residents of the area around this site have suffered years of disruption to their lives resulting from heavy traffic, congestion, noise, vibration and dust from development of the GCHQ Oakley site, while further planning permission has been granted (against local objections) at Cromwell Court (Greenway Lane) and building is expected at the old Premier Products site in Bouncers Lane, all with no doubt attendant problems. It is unconscionable that local residents should be expected to accept many more years of major inconvenience while Oakley Farm Pasture Slopes are built on.

We trust that these objections will be given full and robust consideration and the application to build on the Oakley Farm Pasture Slopes will be refused outright.

Comments: 5th August 2020

We write to make clear our objection to the proposed development by Robert Hitchins Ltd at Oakley Farm Pasture Slopes. The application is for approval in principle for 250 dwellings (with matters of detail reserved) plus specific approval for the site's sole access road from Harp Hill. Our objection is on multiple grounds:

1. Cotswold Area of Outstanding Natural Beauty

The proposed development is on a largely Greenfield site within the Cotswold AONB, and as such is subject to the same protections as a National Park. The boundaries of the AONB were not arrived at randomly but after careful consideration and consultation, which concluded that these pasture slopes should be included: they contribute greatly to the aesthetics of Cheltenham, and act as a haven for wildlife. There are no grounds for reversing these views. Just 0.5% of the Cotswold AONB is situated with Cheltenham Borough and it would be a shocking indictment of Cheltenham Borough Council if it were unable to protect even this tiny slice of Britain's rural heritage.

In early August 2020, the Government brought forward proposals to facilitate quicker approval for planning applications through a presumption of approval. It is notable, however, that the proposed reforms will release building rights anywhere outside existing national parks and areas of outstanding natural beauty. Again, it would be unconscionable for CBC to approve a large-scale development within the AONB when even these most radical Government reforms to planning policy still recognise that it is vital to protect the AONB.

The applicant's claims that building on this scale within the AONB will in some way "enhance" the AONB is of course risible and serves only to underline the desperate weakness of the application.

2. Development Should Be Planning Led

It is an established and fundamental principle that development should be planning-led, so that the broader implications of major developments (e.g. impact on local infrastructure) can be fully considered. Cheltenham has undertaken a detailed planning process, both for its Local Plan and as part of the Joint Core Strategy. The land at Oakley Farm Pasture Slopes has not been included within these plans and should not now be retrospectively approved for development on an ad hoc basis, given the inevitable negative implications (see point 4 below).

3. Outcome of Previous Assessment of this Land

In April 2015, CBC published an independently conducted study entitled:

"Landscape Character, Sensitivity and Capacity Assessment of Cotswold AONB Within Cheltenham Borough Administrative Area".

In respect of the Oakley Farm Pasture Slopes, this study concluded that there were MAJOR landscape constraints to development and LOW landscape capacity for built development. The study concluded with the statement that:

"The findings within this study has concluded that there is limited capacity for built development along urban edge of Cheltenham, however Table 8 has identified a number of possible locations that would have less impact on the landscape character and with robust mitigation could accommodate appropriate development".

Table 8 identified five possible locations for development but EXCLUDED Oakley Farm Pasture Slopes. There can be no reason to think that the grounds for this assessment have changed within the intervening five years.

4. Stress on Local Amenities

Approximately 500 - 1,000 new residents in the area would place additional stress on local amenities for which the developer makes no allowance - and given that this development is outside of the local development plan, no other provision is planned. So local schools, which are already over subscribed, will become more so; local medical facilities (doctors, dentists etc.) already commonly have waits of several weeks for appointments - these will get longer. There is only one substantial supermarket in the whole of east Cheltenham (Sainsbury's Oakley) and it is already crowded at peak times - it will get worse. Recycling facilities at Sainsbury's, Charlton King's car park, the Robins' football ground, etc. are often found to be full - they will be so sooner and more often. And so on.

5. Redevelop Not New Build

The applicant argues that development of this site will provide jobs at a time when Covid-19 is causing unemployment. While we have yet to see the full economic impact of Covid-19, there can no doubt that it will result in the closure of many commercial and retail businesses within Cheltenham. There will be plenty of opportunities for developers to focus on redeveloping these Brownfield sites for residential purposes rather than building on irreplaceable Greenfield sites.

6. Harp Hill Traffic Capacity

Harp Hill is already an extremely busy road relative to its capacity with large volumes of traffic, particularly at morning and evening peak times. It is used as a significant commuter and school run route between east/south Cheltenham and north/west Cheltenham, to avoid the only real alternative of London Road/Hales Road, with its busy crossroads. This already results in significant congestion at the Harp Hill/Priors Road and Greenway Lane/London Road junctions, exacerbated by the need for local residents and business visitors to park on the road near these junctions.

Harp Hill is a road with several very narrow points, a significant gradient for part of its length, and no footpath along the upper stretch. Sight lines along the road for entry/exit from many of the houses are limited. However, there is significant use by: motorised vehicles (including HGVs), very often travelling above the 30 mph speed limit; recreational cyclists (for whom it is a key route out of east Cheltenham and who regard Agg's Hill as an inviting challenge); walkers/pedestrians accessing the AONB where it joins to Cheltenham; and, regularly, horses. There is already frequent and significant conflict between these various types of user - motorists frustrated by slow moving cyclists on the hill, pedestrians in the road and so on. As a resident I have several times been involved in confrontation with motorists who have stopped to remonstrate with me for walking on the road near my own home despite there being no footpath!

The addition of up to 250 homes with access to/from Harp Hill implies a very large number of additional traffic movements per day. This would hugely exacerbate the existing problems and given the topography there would appear to be very limited options to mitigate this.

It is worth mentioning that at the public consultation into this development, one of the developer's representatives admitted to me that access via Harp Hill was far from ideal

given its many problems and challenges, but that their preferred route, from Prior's Road along the existing Oakley Farm track to the side of Sainsbury's, was simply too narrow for a development of this scale.

7. Disruption to Local Residents

Residents of the area around this site have suffered years of disruption to their lives resulting from heavy traffic, congestion, noise, vibration and dust from development of the GCHQ Oakley site, while further planning permission has been granted (against local objections) at Cromwell Court (Greenway Lane) and building is expected at the old Premier Products site in Bouncers Lane, all with no doubt attendant problems. It is unconscionable that local residents should be expected to accept many more years of major inconvenience while Oakley Farm Pasture Slopes are built on.

We trust that these objections will be given full and robust consideration and the application to build on the Oakley Farm Pasture Slopes will be refused outright.

Gray House
Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PR

Comments: 27th July 2020

I write to OBJECT to this proposal for the following reasons:

1. AONB
2. TRAFFIC ON AN ALREADY OVERUSED NARROW ROAD
3. INCREASED POLLUTION

The strongest reason being AONB, it's protected and should not be developed on in any form let alone 250 houses.

Comments: 29th July 2020

I write to object to this proposal very strongly. The Hill has become a very dangerous road with the amount of traffic on it and the speed cars travel on it.

It is a rat race from six ways along Greenway Lane making my exit onto the Hill very dangerous. Also the congestion at the bottom is terrible already without putting several hundred more cars into the equation.

Cleevesyde
Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PR

Comments: 29th July 2020

I strongly object to this development for many reasons.

1) AONB is supposed to be protected land. I don't understand why this proposal is even being given consideration. What is the point in having protected land if money can buy declassification?

2) The development will devastate this countryside and the wildlife living on/in it. I regularly witness passers by stopping to photograph the wildlife and view of this beautiful land. To build a large road to accommodate potentially 500+ vehicles on this protected land is disastrous.

3) Visually the development will have a terrible impact. Due to the position of these properties on the hill they will be seen for miles around and would be an unwelcome blot on the landscape.

4) During the winter months when snow has fallen Harp Hill is too treacherous to drive, unless in a 4x4. It is not possible to drive up or down Harp Hill, or Greenway Lane. We have experienced this each time we've had heavy snowfall. Our cars are confined to our driveways and this generally lasts a minimum of three days, therefore the occupants of 250 houses would be trapped in their properties unless they can walk to work.

5) The traffic on Harp Hill has become increasingly higher in volume, speeding vehicles being a regular occurrence. I believe the new access/exit road of the proposed development on to Harp Hill will cause accidents where speeding motorists will collide with cars/bikes exiting the new estate on to Harp Hill. The traffic at the lower part of Harp Hill also becomes very congested.

6) I'm very concerned about the angle at which the vehicles headlights will be pointing when they drive out of this new estate on to Harp Hill, they will be shining directly into our first and second floor windows (ie lounge and bedrooms), causing light pollution and corruption to our property which will heavily impact on our standard of living. This new road directly opposite our house will without a doubt cause devaluation to our property.

Half Acre
Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PR

Comments: 27th July 2020

I live at the top of Harp Hill and I object to the proposed plans for the following reasons:

1. This land is designated as AONB and the proposed development will irreversibly change the character of the area. It is an area which has such obvious and impressive natural beauty which clearly needs protecting and will essentially 'close off' an already heavily build up area under the hill scape of Cleeve Hill.

2. The site has biodiversity importance and as a local resident, my children and I enjoy spotting the variety of wildlife which inhabits this area including deer, butterflies, bees, birds etc. It is clear many within Cheltenham share this love of nature due to the many and increasing numbers of walkers, cyclists and visitors to the area (a dramatic increase in recent months which I am sure will continue).

3. Harp Hill can not cope with the current volume of traffic, it is an incredibly busy and dangerous road (without pavements at the top) and planned access to the site from this road will only increase the risk of a significant accident. The routes from Harp Hill are similarly unable to cope with any additional traffic. Mill Lane is passable as single lane only in places, unmarked and without lighting or pathways. Greenway Lane backs up to the already heavy congested Sixways junction and Mill Lane ultimately exits onto London Road which is already a dangerous and busy road (at the dip). The bottom of Harp hill exits onto a small mini roundabout which can not cope with the current volume of traffic on Priors Road. A further development in this areas, with access onto the hill would increase the traffic on all surrounding roads to a dangerous and unsustainable level.

4. The run off from an additional development, even with soak aways would create further issues for Cheltenham in general, which still suffers from flooding as demonstrated by recent deluges of rain. Flooding on Priors Road and the Cromwell Road area (following line of Wymans Brook) will be put at further risk from this proposed building during episodes of persistent rain.

5. Local schools are full - in September 2019 Gloucestershire County Council were not able to offer my daughter a place at either local school: Pitville or Balcarras as a first choice offer (both walking distance and both within 1.1miles of our house). Instead she was allotted Bishops Cleeve which is 4.3m miles from our house. Mindful that the Council have a walking to school policy and mental and physical wellbeing of children is such a topical and real issue facing UK committees today we found this staggering. It should also be noted the proposed development is no where near the new planned school in Leckhampton.

6. In addition, it is not only the education system which would struggle to meet the needs of a new estate, it is also the wider infrastructure e.g. doctors surgeries. I know many families who struggle to get doctors appointment within this area, not due to lack of commitment by the NHS but simply because the local infrastructure has not kept pace with house build in the area.

7. As a local resident who lives directly opposite the planned entrance to the estate, I also specifically object to the materially planning consideration of noise and light on both my own and my neighbours properties. Specifically car noise from the new planned entrance and headlights from the cars coming up the hill to exit the planned development, onto Harp Hill, will undoubtedly shine lights directly into the front of our properties (and likely to the second floor elevation due to the slope of the hill).

Haytor
65 Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PR

Comments: 4th August 2020

I wish to lodge an objection against the Oakley Farm planning application (20/01069/OUT).

I am a 6th form student living in the local area and would like to object to the planning application to build 250 houses on the Oakley Farm fields. I oppose this proposal for the following reasons:

The site of the proposal is designated as AONB, and it seems contradictory to build houses on an area of the environment that is supposed to be protected and preserved because of its beauty. The construction of 250 houses on this site would also spoil the view from houses and streets in the area, as well as from vantage points such as Cleeve Hill. Oakley Farm Pasture Slopes can be seen from Cleeve Common and The Cotswold Way, which I frequently use with my family.

As a daily pedestrian of Harp Hill (walking to the bus stop for school), I have often seen many animals in the fields that form part of the site, such as deer and foxes, and I have also heard of sightings of polecats, which is a protected species. It would be detrimental to the natural biodiversity of the area to destroy these animals' habitats. In my own garden, we see badgers, deer, foxes and bats. I see bats every evening in the summer and I believe other houses adjacent to the fields at the top of Harp Hill also have bats. Our houses are very close to the Oakley Farm fields and I imagine similar wildlife is present there too as the land is unspoilt and as nature intended.

The construction of 250 houses will inevitably bring a vast increase in the number of vehicles on the roads in the area. Two points that are of particular concern to me are the roundabout at the foot of Harp Hill, where I have to cross every day, and the Sixways junction at the end of Greenway Lane. These junctions are already very busy and congested at rush hour, and increased traffic in these places will affect many people all over Charlton Kings. The increased volume of traffic would also cause more problems with parked cars towards the bottom of Harp Hill. A lack of driveways there means people must park their cars on the road, and a congested road could lead to long standstills and may affect pedestrians' ability to cross the road. I believe this is already an unsafe road due to an absence of footpaths towards the top of the hill and is exacerbated by drivers ignoring the speed limit of 30mph. More traffic would of course make this an even more dangerous place to walk and cycle.

For these reasons, I ask that councillors to reject this application under all circumstances, and that my objection be recorded in the online public comments.

Sky View
Camp Road
Cheltenham
Gloucestershire
GL52 6PS

Comments: 2nd August 2020

We strongly object to the application to build homes at Oakley Farm and to the construction of the related infrastructure.

We understand the need to build additional homes but the land in question is an area of outstanding natural beauty and we do not accept that this needs to be destroyed as other more suitable sites undoubtedly exist.

The proposed site is not included in Cheltenham Borough Council's existing local plan and were this site to be developed it would destroy a beautiful area of countryside on our doorsteps not to mention the loss of wildlife and habitat. This would leave lasting visual damage to the local area and would mean yet more creep of housing into our precious countryside.

Furthermore, the flow of traffic along Harp Hill is very heavy at peak times and the increase generated from a development of this nature will cause considerable further problems, particularly at the foot of the hill at the two mini roundabouts. The traffic also flows through to the six ways traffic lights meaning significant queues along Greenway Lane. It also needs to be considered that significant numbers of cyclists and pedestrians use Harp Hill and the pedestrians walk along the road as there is no pavement. Their lives will certainly not be safer if ever more vehicles use the road.

Greenway House
Camp Road
Cheltenham
Gloucestershire
GL52 6PS

Comments: 27th July 2020

As many others have already commented my objection is based on three basic points.

1. The area is designated as AONB. My understanding is that the fundamental point of designating areas as AONB is to conserve and enhance the natural beauty of the landscape. This planning application appears to go totally against this objective.
2. The proposed access road will add a large amount of traffic onto an already crowded minor road, Harp Hill. The road narrows at various places with blind bends, adding additional traffic would increase the risk of accident. The road is only partially paved and has a good number of walkers using the verges to enjoy the AONB. Harp hill needs traffic calming measures and better facilities for walkers, not the addition of 250+ more cars.
3. The area (Battledown Park) has already been developed with a large number of homes, this has put a strain on local services. With an addition of 250 homes, how is this to be balanced with local services such as schools, retail, social spaces, doctor's surgery's etc.

Northern Lights
Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PT

Comments: 12th August 2020

I object to the above development and wish to add my support to the many other members of the community who have objected to this development.

The proposed development does not demonstrate nor meet the criteria and guidance as to the development of land with ANOB.

The definition of an AONB is land protected by the Countryside and Rights of Way Act 2000 (CROW Act). It protects the land to conserve and enhance its natural beauty.

Under the CROW Act, Cheltenham Borough Council (CBC), must make sure that all decisions have regard for the purpose of CONSERVING and ENHANCING the natural beauty of the AONB.

The Cheltenham Local Plan, just published and adopted by CBC Councillors after a lengthy period of debate, EXCLUDES this specific area from future housing development.

The main reasons for my objection are outlined below.

My comments predominantly point the Council to planning legislation and criteria that need to be considered and demonstrated as having been met in order to justify the granting of this application.

Environmental Impact -

The development is within an ANOB and as such Cheltenham Borough Council (CBC) need to demonstrate how they have taken account of the Landscape Character, Sensitivity and Capacity Assessment of Cotswolds AONB within the Cheltenham Borough Administrative Area, produced by Cheltenham Borough Council in 2015.

In particular CBC need to demonstrate, in their decision making process, how they have taken account of the assessment of Oakley Farm Pasture Slopes (LCA 7.10) and the fact that this area is considered to have:

- high visual sensitivity;
- high landscape character sensitivity;
- high overall landscape sensitivity;
- high landscape value;
- a major overall landscape constraint;
- low overall resulting landscape capacity.

CBC also must demonstrate that they have taken into account the following guidance in its decision making process and I explicitly refer CBC to the Cotswolds Conservation Board letter, dated 6th June 2019, (addressed to the planning officer at CBC), where the following two documents are referenced

- Cotswolds AONB Landscape Character Assessment (LCA) and
- Landscape Strategy and Guidelines (LSG)

As referenced in this letter, CBC should take account of the LCA and LSG for Landscape Character Type (LCT) 2D (Escarpment - Cooper's Hill to Winchcombe), as well as the following.

With regards to the LSG, the council in assessing this application must identify how the proposed development would address the 'potential landscape implications' of the development and address the 'landscape strategies and guidelines' for LCT 2.

The council should identify how - and the extent to which - the proposed development will:

- avoid the encroachment of built development onto escarpment slopes;
- avoid intruding negatively into the landscape;
- avoid the degradation of views from and to the escarpment;
- maintain the open and dramatic character of the escarpment;
- avoid suburban building styles, standardised housing estate layouts, suburban style lighting and other inappropriate construction details and materials;
- avoid cramming development right up to boundaries, resulting in a hard suburban style edge to the development;
- minimise light pollution;
- incorporate local, Cotswolds AONB limestone and vernacular building styles;
- conserve the rural character of the Cotswolds AONB road network, for example, by avoiding the introduction of suburbanising features into this network.

Socio Economic Impact

CBC in their assessment of this application need to make reference to the following;

- under paragraph 11 and footnote 6 of the NPPF, the presumption that local authorities should seek to meet the full objectively assessed housing needs for their area does not apply in AONBs;
- under paragraph 172 of the National Planning Policy Framework (NPPF), the scale and extent of development within AONBs should be limited and planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.

Alternatives

CBC need to demonstrate that they have considered alternative locations outside of the Cotswolds AONB. This is consistent with the requirement of the National Planning Policy Framework (NPPF) (paragraph 172), relating to major development proposals in AONBs, to assess the scope for developing outside the designated area.

This guidance states that Councils should not consider the Cotswolds AONB to be a more suitable location for (major) development than the Green Belt, as exceptional circumstances must apply in both cases, which have not been demonstrated by this application.

The UK's Housing Minister Robert Jenrick's recent planning reforms clearly convey that land designated as AONB will be protected from development. His published article states "...our green belt, areas of outstanding natural beauty and rich heritage - will be protected as the places, views and landscapes we cherish most and passed on to the next generation as set out in our manifesto".

Cheltenham Borough Council has published that "...the supply of houses for 2011 - 2031 already exceeds the need as outlined in the recently agreed Cheltenham Plan for Housing".

Transport and Access

In making their assessment CBC need to demonstrate that Environmental Impact Assessment (EIA) has identified and acknowledged that Harp Hill and Greenway Lane are located in (or directly adjacent to) the Cotswolds AONB and that the proposed development will increase traffic levels on these roads and on other roads within the AONB, including Leckhampton Hill, the A40, A435, A436 and A417.

The EIA should specifically identify the anticipated distribution of traffic movements on these AONB roads from / to the proposed development. It should also identify baseline and forecast data for the number of traffic movements on these roads, both during construction (including HGV lorries) and once all the houses are occupied.

The EIA should identify mitigation measures to minimise the adverse impacts of any increase in traffic on AONB roads. For example, the EIA should identify measures to increase the use of alternative transport modes (such as walking, cycling and public transport) and to minimise 'rat-running' on the minor road network near the proposed development. It should also identify the measures that will be taken to conserve the rural character of the minor road network in the AONB (including Harp Hill and Greenway Lane) and to minimise the introduction of suburbanising features such as mini roundabouts, street lighting, kerbs and traffic calming.

The EIA should also acknowledge that increased traffic levels in the Cotswolds AONB, resulting from the proposed development, is likely to have an adverse impact on the AONB's 'special quality' of tranquillity.

Noise and Vibration

The EIA should take account of - and explicitly refer to - the Cotswold AONB 'special quality' of tranquillity. Any increase in noise and vibration resulting from the development is likely to have an adverse impact on the tranquillity of the AONB. The EIA should identify measures to avoid and minimise adverse effects on this tranquillity.

Wildlife and Fauna

This development will lead to the destruction of irreplaceable wildlife habitats and removal of hedgerows/trees where an abundance of birds/deer/foxes/badgers/owls and bats live & visit this AONB.

Wildlife will be hugely affected, the deer population is thriving and I often see deer in my garden having crossed the fields and Harp Hill Road to access my garden.

Flooding

As you will be aware the development at Sainsbury's & Oakley Grange has already had a detrimental effect on the ability for land to drain without flooding. The junctions at Wessex Drive, Priors Road, and Whaddon are regularly flooded across the entire width of the roads. This then results in regular further flooding in Hewlett Road, near to its junction with Pittville Circus Road. In addition rainwater already floods the hill and the recent heavy rainfall caused a number of properties on Hales Road to flood with both rain and foul water. Any increase in development would put further strain on flood issues in these areas.

Cumulative and combined effects

CBC need to demonstrate that they have assessed the cumulative and in-combination effects on the purposes of:

- (i) conserving and enhancing the natural beauty of the Cotswolds AONB; and
- (ii) (ii) increasing the understanding and enjoyment of the special qualities of the Cotswolds AONB.

This should include consideration of all of the issues outlined above as well as the additional comments made by many members of the community in their objections to this application, which in combination will have a significant negative impact both cumulative and combined as a direct result of this development.

For all the above reasons I strongly object to this development and application.

The Heights
Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PU

Comments: 19th February 2021

We would like to object strongly to the request for planning permission at Oakley Farm, Cheltenham for 250 houses.

1 This is part of the Area of Outstanding Natural Beauty which should have the highest level of protection by law.

2 There has already been extensive recent development of new houses at the old GCHQ site and elsewhere nearby, with no additional infrastructure of already over stretched schools and GP practices.

3 The local road, pavement, foot-path and cycle path access is poor to very poor or non existent. The road surface is already dangerous and pot holed.

4 Harp Hill is heavily used as by vehicles by passing the centre of Cheltenham even though it leads onto narrow lanes and a small traffic light junction at Sixways. The roads run past a primary and secondary school which already have traffic problems.

5 There is no footpath at all at the top of Harp Hill and little capacity for increased traffic/ exiting traffic and heavy plant in building work. It is difficult and dangerous already to walk or cycle at present because of fast traffic, road surface and narrow roads.

6 There is an aging water treatment plant/ Hewlett reservoir above the proposed development which could well be damaged by extensive heavy building work.

7 There is poor drainage and heavy rainfall with a steep gradient and new housing below.

8 There are diverse wildlife and tree heritage using the fields. We often see badgers, deer, red headed woodpeckers and other wildlife which would be threatened by development and loss of habitat.

9 Any development would involve heavy carbon emissions, increased traffic and tree destruction.

Sherwood
Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PU

Comments: 28th February 2021

It's an green field area of beauty and should stay that way. Why would we label it as such and then destroy it when money can be made? Also, there are already enough cars going up and down Harp Hill. Adding more car will make it noisier and more dangerous.

Craigmount
Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PU

Comments: 10th August 2020

I strongly object to the application/development for the following reasons:

1. AONB Land - I'm staggered that an application can/has even been submitted for build on AONB land. This is precious green space that as a nation we must protect for our mental health, well-being and long-term sustainability. Building on AONB and green spaces goes against all national policy. The developer has no moral conscience and complete disregard for the importance of our nations greens spaces and AONB - stating at the community consultation event that they will (eventually) get planning, regardless of the impact on the local community for which they clearly have no genuine concern or care for.
2. Access/traffic - Harp Hill cannot accommodate an increase in any more traffic. It already suffers from serious traffic speeding which has become worse since the GCHQ redevelopment, not to mention race traffic. With 250 new homes comes the traffic of at least 500+ cars, plus all the online delivery vans and lorries that go with it.
3. Local plan - this land is not part of the local plan for development.
4. Visual impact - Cheltenham has always been a beautiful town. We have to protect what makes it such a nice place to live. The development would further damage the visual impact of the Cotswold escarpment. Once its gone we can't bring it back.
5. Road safety - Harp Hill is incredibly steep and narrow and cars already speed up and down the road - almost every car triggers the 30mph speeding sign - with no consideration for pedestrians or cyclists. It's unsafe and an absolute disaster waiting to happen. The road isn't sufficient or appropriate for access. If anything, the road needs intervention to reduce traffic - six ways traffic lights have made it a shortcut and rat run.
6. Local flooding - we are seeing more and more flooding at the bottom of Harp Hill because of over development in the area. Building on this green space will only add to this issue.
7. Noise disturbance - As a local resident I feel we have been completely forgotten about. The letter from David Oakhill (head of planning) says construction traffic doesn't qualify as a reason for objection, yet as a local resident we have had to endure 5 YEARS of construction traffic from the GCHQ development. Up to 30 earth moving lorries speeding up and down the road every day, as well as abuse from the drivers for 5 YEARS!!! The noise has been unbearable, with traffic starting as early as 7am. The roads have been left an absolute disgrace and the only people left suffering are the residents. The developer has made his money and moved on with no section 106 road resurfacing works. And now the suggestion that the community will endure the construction of another 250 homes - its completely unjust.

8. Air pollution - Along with road noise, air pollution is a serious issue that needs consideration.
9. Amenity - During COVID lockdown the space (AONB land) has been used to graze livestock again and brought peace and calm to the area. Harp Hill has enjoyed a stream of pedestrians using the road to escape town and access the countryside and tranquillity - which includes the proposed development land and its views over the valley.
10. Local infrastructure - there isn't enough supermarkets, schools or doctors to accommodate a further 1000 or so local residents.
11. Wildlife and mature trees - the area has an abundance of deer and other wildlife that should be protected not needlessly pushed out of their habitats. They are a national asset. They should be nurtured and protected.

23 Priors Road
Cheltenham
Gloucestershire
GL52 5AB

Comments: 22nd March 2021

This development must not happen. This is an important area of Outstanding Natural Beauty, home to many deer, birds and animals. This will destroy their natural habitat and there isn't much land for them to go to if this land disappears. Traffic along Harp Hill is already too busy and the speed some cars travel is way too much. Traffic is also growing along Greenway Lane and I recently saw a dead mother and baby deer having been killed by a wreckless speeding driver. This will increase the number of animals killed.

The access route for this new development has not been thought through properly. There is already too much traffic.

There is also going to be a development on the land by Harp Hill and Greenway Lane. Don't approve any more.

Please do not allow more areas of Cheltenham to be destroyed. Let our children enjoy green fields and wild animals. There are enough houses already on the former GCHQ Site.

Rambling Views
Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PU

Comments: 3rd August 2020

The traffic generated by the homes on the development will be too much for Harp Hill. It is already quite busy as it is, to add 250 extra houses using that route would cause major congestion.

Jasmine House
Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PX

Comments: 11th April 2021

We strongly object to the plans of 250 houses at Oakley Farms. It is our opinion that these properties will seriously impact an area considered as an area of outstanding national beauty. (AONB). in addition as a resident residing on Harp Hill it is already clearly evident that the local infrastructure cannot support the addition of 250 more homes. Over the 10 years we have lived on Harp Hill we have seen a dramatic increase of traffic using Harp Hill as a 'rat run' through Charlton Kings. This coupled with the increase in people heading up to Cleeve Common both by car and cycling this road has become seriously dangerous and is an accident waiting to happen.

In conclusion we believe this development is both unnecessary and to the detriment of the local environment.

Northridge
Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6PX

Comments: 5th August 2020

My wife and I have lived on Harp Hill for the past 41 years. Our home is basically the last but one on the North side of Harp Hill, we are within touching distance of Oakley farm pastures.

We strongly disagree with the proposal to "dump" upwards of 250 homes on this AONB land for obvious reasons, principally the cancer like encroachment into cotswold green belt.

Harp Hill (a narrow road) is already a traffic "rat run". The resulting huge increase in traffic on Harp Hill and at the junction with Prior's rd will affect health and safety of all residents.

Willowbank
60 Harp Hill
Charlton Kings
Cheltenham
Gloucestershire
GL52 6EW

Comments: 23rd July 2020

It is hard to believe that the council can consider granting permission to place access to this development on Harp Hill, when the applicants own transport assessment predicts it will produce traffic queues of up to 43 vehicles at the bottom of Harp Hill at peak AM times compared to just 2 today. That's over 200 meters of queueing traffic!

The mitigation measures suggested in terms of junction widening on the double roundabout seem to be drawn entirely from speculation as to the root cause of the issue and do little to build confidence that they will remedy it to the extent shown.

Harp Hill is clearly an unsuitable place to be putting access to a development of this size - It simply can't cope with the increase in traffic produced by 250 houses.

89 Wessex Drive
Cheltenham
Gloucestershire
GL52 5AF

Comments: 4th August 2020

I am Secretary of Harp Hill Residents Association, consisting of 20 properties which are situated in Wessex Drive, we strongly object to building 250 houses due to the following concerns: Heavy rain leads to flooding in the pedestrian lane running at the back of our properties, loss of fields will create more problems. Increased noise from a potential increase in traffic on Harp Hill together with dangerous access problems and the state of roads. Increased capacity on schools/doctors and local amenities. Destruction of irreplaceable wildlife habitats and removal of hedgerows/trees where an abundance of birds/deer/foxes/badgers/owls and bats and other creatures all live in harmony and visit, this area is of outstanding beauty. These sloping pastures have given adults and children alike many hours of enjoyment especially when snow is on the ground. The loss of this green space will have a massive environmental impact on the area. We are already surrounded by houses due to the ongoing building at the back of Sainsburys, why do we need more? The view over the rolling hills and fields will disappear and instead three storey/two storey houses will destroy the beautiful area. We are sure there must be other areas Robert Hitchens can build their houses, without infringing on community enjoyment of this outstanding countryside which will be lost forever.

87 Wessex Drive
Cheltenham
Gloucestershire
GL52 5AF

Comments: 6th August 2020

We strongly object to this development.

Firstly our concern is the AONB, we regularly see deer, bats, owls, and other animals and wildlife. This will force them out with very little places to go to. An AONB area is protected and therefore it is not be developed on.

Secondly the schools are already over subscribed and locals cannot put their children into the local schools. Where will 250 children go when no extra school is built and the

impact on the town's doctors, dentists, etc when getting an appointment is already difficult.

Flooding is a big concern as Harp Hill Road ready has water running down and the drains cannot cope. Wessex Drive was flooded in 2007 and having houses built on the fields right next to us means there is a higher chance of future flooding and damages to the properties.

Traffic is horrendous currently, coming out of Hillview Road. With the additional 500 cars from the 250 houses, the surrounding roads will be congested and the pollution walking to the local nurseries and schools with children has a health impact.

81 Wessex Drive
Cheltenham
Gloucestershire
GL52 5AF

Comments: 3rd August 2020

I wish to OBJECT to the plan to build 250 new homes
I live adjacent in Wessex Drive Oakley Farm Pastures is an area of outstanding natural beauty.

I regularly see wild life including bats and various amphibians such as frogs, toads and newts some of which I understand are protected species. There are also a number of mature trees.

It is very clear to me that there must be many other less sensitive sites.
Rather than destroy the environment for the endangered wildlife and risk flooding by taking away more of the hill side and depriving future generations of the joy of living in the Cotswolds let the developer find somewhere more suitable.

77 Wessex Drive
Cheltenham
Gloucestershire
GL52 5AF

Comments: 31st July 2020

AONB, forced relocation of wildlife, concerns that Harp Hill can not sustain the increase of traffic, further pressure on local amenities.

75 Wessex Drive
Cheltenham
Gloucestershire
GL52 5AF

Comments: 3rd April 2021

I am writing to appose the planning application for 250 houses in the Oakley Farm Pasture Slopes, which as you know is situated in an area of outstanding natural beauty.

The disruption to the environment should be the chief concern. We already know that humans are to blame for the continual extinction of much of the earth's wildlife, and the majority of scientists agree we are heading towards catastrophe if we do not stop tearing down all things natural, we need plants and wildlife. Including things as small as insects, without these protected lands the wildlife cannot thrive, and without these smaller animals there won't be any plants because there will be no creatures to pollinate them, and if there are no plants there is no US.

Secondly, the amount of pressure these homes would put on existing infrastructure would be unacceptable. The traffic at 6 ways junction in Charlton Kings is bad enough already let alone with any more traffic going through it. Greenway Lane is also for the most part only big enough for 1 car at a time to pass, the traffic through there would be abysmal, all roads towards Charlton Kings are not built for this sort of traffic!

Thirdly, the road I live on is hard enough to get out of seeing as it's near to the Sainsburys traffic lights. More houses /traffic using the roads will put more pressure on the Sainsburys traffic lights and in turn more pressure on the double mini roundabouts towards Hales rd. Let alone when all this is topped off by race traffic!

In summary the stress it would place on existing roads and infrastructure is too great, there aren't enough schools as it is. And the fact it sits on PROTECTED land should mean it should never even be considered.

Please do all that you can to protect this area.

64 Wessex Drive
Cheltenham
Gloucestershire
GL52 5AU

Comments: 18th July 2020

We live at the top end of Wessex drive, and have cause for concerns with building 250 new houses on the Area of ANOB land. There has been flooding up here in 2007 which was a surprise given we are so high up. Also has anyone researched the wild life there is in the surrounding area. Also the Extreme problems that will occur with volumes of traffic in the Surrounding areas. We already have problems exiting Hillview Road. We would very much like our voices heard.

Comments: 28th July 2020

We live at 64 Wessex drive at the top end, we have already experienced flooding which you may not know about, I can't get my head round that a planning application has gone in to build on ANOB site in the first place and it's been rejected for my understanding for traffic problems on Battledown. It worries us very much with so many houses being built and the thought of ground movement when we are so close with only a footpath separating from our house. Also we see so many of the wildlife from neighbouring fields which is cause for concern. We strongly OBJECT.

Comments: 29th July 2020

We live at the top end of Wessex drive, which has the public footpath running down the side. Back in 2007 there was a lot of flooding up here which may surprise you. With all

these homes being built it concerns us very much. Traffic is bad now trying to get out of Hillview road and battledown has become a "Rat Run" the road is crumbling with so much traffic. I thought this was an AONB does that suddenly change. We strongly object to this happening

62 Wessex Drive
Cheltenham
Gloucestershire
GL52 5AU

Comments: 13th August 2020

Please accept this comment as an objection to the proposed development at Oakley Farm on the following grounds:

The development is proposing to sacrifice a designated area of the Cotswolds AONB. AONB is defined by the National Association for Areas of Outstanding Natural Beauty as "... a designated exceptional landscape whose distinctive character and natural beauty are precious enough to be safeguarded in the national interest. AONBs are protected and enhanced for nature, people, business and culture." I feel it must be understood and acknowledged by people in decision making positions, that despite the size and nature of the area we are commenting on, areas like this cannot continue to be chipped away; we will forever degrade these natural spaces entrusted with this AONB designation, to the point where it has no meaning.

This AONB supports a huge array of wildlife, such as bats, badgers, grass snakes, deer, owls and an abundance of hedgerow birds, all witnessed first hand on this land. Areas such as this help to maintain a relative safety barrier between our natural wildlife and rural spaces and our ever expanding towns and cities. With the continued degradation of our wildlife's habitat, we will severely risk any losing any endangered species that may reside on this land or further accelerate our native species towards a protected status. We have a duty of care to respect and maintain areas that sustain native wildlife.

The proposed immediate access to this site is simply dangerous. Further increasing traffic flow to Harp Hill by, realistically 250-500 cars, will further increase the danger on a notoriously dangerous and difficult stretch of road where the speed limit is often broken and which is commonly used as 'Rat Run'. Increasing the danger of Harp Hill is the exit onto Priors Road and Hales Road. The double mini roundabout at the bottom of the hill is difficult to get out of safely even at the best time of day, getting increasingly worse around morning and evening rush hours. The visibility of oncoming traffic from Priors Road to Harp Hill is insufficient and vehicles often gamble when exiting the road.

56 Wessex Drive
Cheltenham
Gloucestershire
GL52 5AU

Comments: 5th August 2020

We are writing to object to the planned application on the Oakley Farm pastures (planning ref. 20/01069/OUT). As an Area of Outstanding Natural Beauty (AONB) we feel that this land deserves protection by its very own designation as an AONB and as a

greenfield site. Our countryside should be preserved for future generations and we feel that the development on this site will set the precedent for the development on the Cotswold escarpment. The Cotswolds is rich in heritage and its countryside is what makes this place unique, generating tourism and creating income for local communities.

Other specific objections and concerns include:

- Safety. I walk my dog and use the kissing gate at the top of Harp Hill every day. As there is no footpath on the same side as the gate, I am forced to cross the road. I find this difficult now as it is, especially where the road bends sharply to the left and cars frequently speed round the corner. An increase in housing will see more vehicles on the road and we are concerned that crossing the road will be hazardous. Given the nature of the housing on Harp Hill, a traffic crossing would be inappropriate.

There are also no footpaths on Harp Hill near the entrance to the proposed development. Again we think this will cause more accidents as the road is not suitable for pedestrians to share the space with other road users.

Greenway Lane is popular with pedestrians wishing to access the allotments, the adjoining fields and the cricket club. As there are no footpaths for pedestrians, an increase in the volume of traffic would also be dangerous. I frequently walk my dog up Greenway Lane and feel the volume of traffic using the road is hazardous now.

- Outline planning application. As the application is for an outline application (access road only) it is hard to understand the scope of the proposed development. We do not feel this fair as we can not fully assess their proposed works and understand the impacts fully.

- Visibility. As the site is on a slope, the development will be visible to much of a Cheltenham and have a detrimental impact on people's views to the outlying countryside.

- Traffic. The road network around the development is not setup for an increase in traffic. Given that the roads are in a semi-rural setting they can not cope with the current traffic volumes, never mind an influx of traffic. Of particular concern is the intersection between Harp Hill and Greenway Lane, where there is not enough room for two large vehicles to pass.

- CBC Strategic Housing Plan. This development does not form part of Cheltenham Borough Council's Strategic Housing Plan. There are many other sites identified in the Joint Core Strategy Area which are more sustainable. Development of an AONB should be considered as a last resort.

- Nature. Oakley Farm pastures is home to a wealth of wildlife; we have seen deer, foxes, badgers, bats and many birds (including field birds and owls). As the land is home to a myriad of wildlife, we do not think the wildlife should be forced to leave because of this development. Especially when there are other development sites within Cheltenham which are more sustainable.

- Landscape assessment. Under the 'landscape assessment' (the Ryder report) which was commissioned by Cheltenham Borough Council (CBC) it identified the site as being important and highly sensitive. The report concluded that the land was inappropriate for development. Therefore given CBC commissioned the report we think you should pay heed to the guidance.

- Flooding. Surface run off from the site is high and can be seen to run down the alleyway backing onto the houses on Wessex Drive. The development will lead to more impermeable surfaces, resulting in increased flooding and surface run off. This poses a risk of flooding to existing housing near the proposed development, as well as run off down Harp Hill. The pooling at the bottom of Harp Hill is extreme and is hazardous to residents, pedestrians and vehicles.

We strongly object to the development of this site and recommend that the proposal is rejected. We hope that the AONB can be preserved for future generations, as well as preserving the unique nature of the Cotswold escarpment.

54 Wessex Drive
Cheltenham
Gloucestershire
GL52 5AU

Comments: 5th August 2020
Letter attached.

57 Wessex Drive
Cheltenham
Gloucestershire
GL52 5AF

Comments: 26th July 2020

This is a speculative development which offers no significant value to the area. This is an area already overdeveloped in terms of housing but underdeveloped in terms of infrastructure, e.g.: schools, Doctors Surgeries, and other local amenities.

This will have a serious impact on pollution levels and the already over congested roads. There will also be a significant environmental impact in terms of ecology, biodiversity, geology, and flooding.

This beautiful part of the Cotswolds AONB is used by many locals and visitors to Cheltenham. Walkers, ramblers, cyclists, horse riders, drivers and families with children frequently use the surrounding pathways, lanes, and roads of Oakley Farm Pasture Slopes to enjoy the vista of this spectacular landscape at the foothills of the Cotswolds Escarpment. Harp Hill is a popular viewing point of this magnificent countryside for both visitors to, and residents of, Cheltenham and its environs.

Allowing this development to go ahead gives a green light to other developers with similar ideas, what next? More housing on the edge of Cleeve Hill.

This is a wonderful area of ancient oaks in open sloping grassland and is afforded abundant wildlife. Today it is used for grazing sheep. The area and far reaching views to Cleeve Common can be seen clearly from the public footpath between Harp Hill and Pillowell Close.

Until recently fantastic views of Cleeve Common and beyond were visible from Harp Hill, but unfortunately Robert Hitchins Limited has neglected the hedgerow which had

previously always been maintained, and which now blocks this view. Ironically, partially removing the hedge and building an access road to a large housing estate is cited as one of the benefits of this planning application (according to Robert Hitchens Limited) as it will allow people to enjoy the view! - the view that local people and visitors had always been able to enjoy before the land was purchased by Robert Hitchens Limited.

I believe we need to prevent development of this scale on this precious area and restrict access from Harp Hill.

53 Wessex Drive
Cheltenham
Gloucestershire
GL52 5AF

Comments: 4th August 2020
Letter attached.

42 Wessex Drive
Cheltenham
Gloucestershire
GL52 5AU

Comments: 2nd August 2020

I wish to object to this Application on the following primary grounds.

1) Area of Outstanding Natural Beauty (AONB)

The proposed development site is within the defined AONB, where there is a presumption of no development of this type and scale being permitted. Granting of permission would set a dangerous precedent for further unwarranted and highly damaging incursions into the AONB and Cotswold Escarpment.

2) Site Not Identified in Local Plan for Development

The site is not identified within the Local Plan as being suitable for this scale and type of development and is wholly inappropriate to the local infrastructure capacity, particularly as regards road access but possibly also with regard to drainage and flood risk on the basis of such information as is currently available

3) Loss of Wildlife Habitat

The existing fields are a haven for local wildlife with several rare or endangered species observed in gardens close to the fields on occasions, including hedgehogs and grass snakes. It is difficult to imagine that these as well as the wide variety of other wildlife in the area are not dependent on the continued existence of the pasture and hedgerows.

The proposal for landscaping and public access is not consistent with maintaining a suitable habitat for many species and is likely to lead to increased littering, pollution and disturbance of habitat.

4) Increased Levels of Air Pollution

The Cheltenham BC area is defined as an Air Quality Management Area, with levels of nitrogen oxides (NOx) in particular, already close to or exceeding defined safe (statutory) levels at a number of locations. Existing and already committed developments will add to these pollution levels as traffic levels in particular continue to increase, as already permitted developments are completed.

Spot readings of NOx and particulates (PM10, PM2.5) that I took through 2019 using a portable monitor near the double roundabouts at the bottom of Harp Hill and along Hewlett and Priors Roads, indicated levels of one or both pollutants exceeding WHO safe level criteria, especially at peak times and therefore an increased level of risk to those with heart and lung conditions in particular, but also to the local population at large.

No significant development of this type that is not within the Local Plan should be permitted at all, until the statutory air quality parameters are in full compliance.

5) Inadequate Access to the Proposed Site

The proposed means of access, from Harp Hill, is not acceptable. The road is narrow and is used already as a 'rat run' at peak times to avoid some of the London Road junctions. It is not suitable for further traffic loading.

The road is used significantly by cyclists, horse riders and pedestrians. The pavement becomes very narrow near the bend at the top of the steep section and is also where a public right of way exits from the rear of Wessex Drive onto the road at the blind bend, creating significant risk for those crossing the road. There is no formal pavement between the entrance to the Battledown Estate and the junction with Greenway Lane, with pedestrians obliged to walk on the road for some sections. These sections in particular would become more dangerous with further traffic loading.

The requirement to prevent significant increases in traffic loading has already been recognised in the restrictions on access imposed during the former GCHQ site development. Some further loading is already inevitable from existing smaller scale development currently underway in the locality. This should be the absolute limit.

The road is subject to many speed exceedances, encouraged by its steep gradient. Data from a 2014 speed survey showed that 93% of vehicles exceeded the 30 mph speed limit and in the morning peak, 75% of vehicles exceeded 33 mph, 10% exceeded 43 mph and a number were in excess of 50 mph.

In 2018 after nearly being knocked over myself by a speeding motorist whilst crossing the road from the public footpath, I made representations to the local Police and they arranged for a new survey which was completed in 2019. The Police reply to me at that time was as follows (email communication).

17/05/19 19:59
[name removed]

As promised the speed equipment was placed on Harp Hill finally further to our email conversation in November 2018. As you can see there is high demand for the equipment.

I have today received an email from The Road Safety and Traffic Management Unit stating that the box went onto Harp Hill for a short amount of time and it showed that there was a fairly high level contravention of the 30mph limit.

As such the data has been passed to the Camera Enforcement Officers to action with a view of enforcement.

I hope that when actioned you will see enforcement on the road to reduce speeding on the road and make the roads safer for you and your family.

Apologies for the amount of time it has taken to get back to you.

If you have spoken to or raised these concerns with your local councillors you may want to let them know as well.

Many thanks

Police Constable 2120

Cheltenham Local Policing Neighbourhood Constable

Gloucestershire Constabulary

Cheltenham Police Station | Lansdown Road|Cheltenham|GL51 6QT

It is evident from this that the speeding problem continues and this is further reason not to allow additional traffic load onto the narrow road. The installed passive traffic calming measures are frankly, a joke, being wholly ignored by most motorists travelling both up and down the hill, as the speed survey results show.

6) Additional Congestion and Risk on Nearby Roads

Harp Hill primary exits are onto the Priors and Hewlett Roads and (via Greenway Lane) onto a busy junction on the London Road. Priors Road from the mini roundabouts towards the Sainsbury junction is also a narrow road with parked cars restricting its width. Being the route to the closest supermarket and fuel locations for the proposed development, this section of road would see increased loading, creating additional accident risk along the narrow section where cars are routinely parked and for those exiting onto the road from Hillview Road, already affected by a blind spot created in the realignment of the road at the Sainsbury junction some years ago. There has been at least one accident along this section recently.

There is also an existing problem with congestion at Hewlett Road where it exits onto the mini roundabouts at the bottom of Harp Hill, due to delivery trucks for the two shops located there parking just off the roundabouts, combined with motorists visiting the shops reversing out on to the road and/or parking on double yellow lines. This creates an accident risk, especially to pedestrians and cyclists and further traffic loading on this road can only make this problem worse. Vehicles approaching the roundabout or reversing off the shop frontage can be obliged to move across areas which are blind to vehicles coming into Hewlett Road off the roundabout, or themselves forced to occupy the wrong side of the road at this busy junction.

As such, traffic loadings on these local roads should not be allowed to increase further, which will be the case if the proposed development is allowed to proceed.

Comments: 3rd August 2020

Letter attached.

32 Wessex Drive
Cheltenham
Gloucestershire
GL52 5AU

Comments: 13th August 2020

Having looked objectively at the proposed plans for Oakley Farm Pastures, I wish to object for the following reasons --

- 1) This is an area of Outstanding Natural Beauty.
- 2) The whole site is not capable of supporting some 250 properties
- 3) The road links to which this proposal will be attached simply are not of a sufficient standard, i.e. Step hill, width, surface condition , street lighting etc . Furthermore the exits of this road are itself troublesome with major delays particularly at peak times, and has become a Rat run due to local heavy congestion This development will certainly add to congestion.

10 Hillview Road
Cheltenham
Gloucestershire
GL52 5AD

Comments: 20th July 2020

Traffic in this area at times is very busy.

The visual impact from priors road etc will be severely impacted with negative affect.

Amenities in insufficient.

5 Sussex Mews
Cheltenham
Gloucestershire
GL52 5FU

Comments: 13th August 2020

I have multiple objections to this development and will highlight points below that I feel need to be addressed by the planners and Cheltenham council:

- 1) The homes on the old GCHQ site are already extremely condensed - there are minimal provisions for services like schooling and GPs in this area - a further 250 homes can not be accommodated by already limited services without provision for this. Children in the area already fall between school catchments and can struggle to access a place at a local school. I believe that the planning should be rejected in its current state. If housing were to proceed I feel it should be significantly reduced in number, done in a more sympathetic way to the environment and ensure additional community provisions are incorporated.
- 2) The additional traffic on harp hill will be considerable. The small double round about onto Priors road already struggles to cope with rush hour traffic. A traffic plan to deal with the additional cars would need to be developed for safety.

3) in relation to point 2, there are no safe pedestrian crossings from the oakley side of harp hill to the battledown side of harp hill. There are also no safe pedestrian crossings across from harp hill onto priors road, hewlett road or hales road. If you are going to build 250 homes, with the associated children that will need to walk to the nearest schools and shops then pedestrian crossings need to be planned to make it safe.

4) in relation to point 2&3, there is no safe footpath alongside the edge of the development and harp hill. If you wish to build a large number of family houses then safe paths need to be incorporated for residents to safely walk down to the town amenities and up to the countryside at Aggs hill.

5) Harp hill is a narrow single track road without any current limitation on roadside parking. Commonly cars park outside current houses reducing the road to one way traffic. If parking is allowed to continue, this will further worsen traffic congestion and access for residents along harp hill and in the new development. This needs to be addressed but double yellow lines on both sides could significantly affect existing homes on harp hill.

6) The farm access track between Sainsbury's and Hillview road is not wide enough for car access and would worsen traffic trying to exit onto prior's road. This should be developed into a cycle/foot path and accordingly be taken on and maintained by the council. There are trees and hedges along this path which someone needs to take responsibility for. It also needs dog poo bins placed along it as it is used by many dog walkers but is not maintained and kept clean.

7) the footpath running from harp hill, behind wessex drive, the the farm access track is narrow and poorly maintained with no lighting or bins. This needs to be improved if so many more residents are to be expected to use it.

8) in relation to points 5, 6 and 7 - lighting, bins and maintenance along harp hill, the foot path and farm track need to be improved if they are to become major access ways for the new housing.

9) The area of land that is planned for development is on a steep gradient. The ground is primarily clay and potentially unstable. Subsidence is a potential issue to houses built nearby. I believe the land is an old clay mine which means grounds works such as piling would need to be undertaken to ensure subsidence for the new and the surrounding existing properties is avoided.

10) the battledown centre (school for children with additional needs) is located on harp hill. The increased congestion on harp hill from an additional 250 homes will unfairly affect their air quality and access.

11) internet provision to the area is limited and fibre optic internet is not currently available to existing homes. The addition of 250 homes would cause a reduction in broadband speed at a time when many people are working from home. Limitations on capacity of the network need to be addressed before adding so many homes.

4 Sussex Mews
Cheltenham
Gloucestershire
GL52 5FU

Comments: 30th July 2020

This development is out of all proportion to the site. It is proposed to build up to 250 houses on a greenfield site in an AONB. It does not comply with the local development plans for Cheltenham and there are other areas which are far more suitable for this type of development. The destruction of nature and wildlife in this semi-rural area is unacceptable. In addition, the large increase in traffic which would be using Harp Hill and Greenway Lane would overload the local road system and clog up Priors Road, Hales Road, Hewlett Road and Harp Hill in particular, creating dangerous situations for pedestrians and cyclists, not to mention the increased air pollution. At a time when we are being encouraged to protect the environment, it would be irresponsible to go ahead with this plan.

19 Hillview Road
Cheltenham
Gloucestershire
GL52 5AE

Comments: 6th August 2020

I object to this development as it is on an AONB and I thought the idea of these areas was to preserve the environment for the good of all, both human and animal life. I recognise the pressing need for more and especially affordable housing but there has been enough development on the brownfield former site of GCHQ which appears to me to be putting a strain on local resources and amenities. In particular, the increase in traffic on Harp Hill would create blockages at the Priors Rd roundabout at peak times.

In addition I object to the use of the farm access track as a cycle path because this would inevitably become a motor cycle path as it was in the days that the track was not gated as it is now. A cycle and pedestrian route could be provided via Battledown Park development which would provide for a safer access to Priors Rd as this is already provisioned for at the junction with Redmarley Road.

The farm track could remain as a gated public footpath with (hopefully) better managed green space than as now.

If the development is to proceed I would sincerely hope more work is done to mitigate the run-off during the ever more frequent heavy rainstorm events. To my mind a little pond in the corner of the lower field looks wholly inadequate in comparison to the flood alleviation schemes that have been put in place in the near locality.

7 Pillowell Close
Cheltenham
Gloucestershire
GL52 5GJ

Comments: 11th January 2021

I wish to object to the plan development of 250 houses in the site of Oakley Farm.

I have a serious concerns of the wildlife, the innapropriate vehicle access which will have an impact on the Oakley as well as Harp Hill and surrounding areas. Also a big concern of flooding issues and of course we want to protect the grade II listed reservoir and it's building.

27 Pillowell Close
Cheltenham
Gloucestershire
GL52 5GJ

Comments: 5th August 2020

I am concerned about the negative impact of this proposed large housing development in this area of outstanding natural beauty. I am particularly concerned by the number of new properties being proposed in an already high density area and the negative impact this could have on noise levels (already quite high at times on the Battledown Park estate), traffic and wildlife. Battledown Park has high density levels already in place and is a large overdeveloped site, this is somewhat offset by this small area of outstanding natural beauty which if this development goes through will belost. This would create a huge negative visual, noise and traffic impact for residents of Battle down park particularly those living alongside the boundaries proposed. We currently enjoy the interaction with nature and wildlife that this small area provides it is a peaceful haven in an already highly populated area. I am also concerned at the precedent this sets for other development on AONB and the impact on wildlife. 250 homes is far too many.

21 Pillowell Close
Cheltenham
Gloucestershire
GL52 5GJ

Comments: 13th August 2020

I object firstly on the grounds that a development will ruin the beautiful views of the AONB. The increased traffic in an already busy area will make the roads even more dangerous. Harp Hill is a dangerous road as it is with cars frequently speeding up and down. The mini roundabouts at the foot and the junction with greenway Lane at the top of the hill are horrible junctions and would struggle to cope with an increased volume of traffic. Local amenities such as good schools and doctors surgery's are in short supply for this area as it is and a further 250 houses will overload these.

33 Pillowell Close
Cheltenham
Gloucestershire
GL52 5GJ

Comments: 19th July 2020

Traffic on Harp Hill has increased considerably since the ongoing GCHQ site of residential development. With the increase in walking and cycling on this, and the

surrounding, roads this needs to be reviewed. If walkers and cyclists are to be encouraged to visit AONB areas then provision needs to be made.

The current problems for pedestrians:

- Lack of pavements
- Narrow pavements
- Speed of traffic particularly travelling down the hill

The current problems for cyclists:

- Terrible state of the road surface

The double roundabout at the bottom of Harp Hill is not easy for pedestrians to navigate. Consideration must be given to people trying to cross when any remodelling work is proposed.

In the Traffic Assessment section 7.57 A40 London Road/Old Bath Road, B4075 Hales Road Junction tables 7.15 and 7.16 showed a marked increase in traffic numbers.

'The results show that junction is operating over capacity in both the AM and PM peak hours in all three scenarios. As the junction is operating over capacity at present any additional traffic will only exasperate the existing situation resulting in increased queuing and the worsening of overall junction performance.'

However there is no mention of this in the summary.

35 Pillowell Close
Cheltenham
Gloucestershire
GL52 5GJ

Comments: 6th August 2020

I strongly object to the proposed development of 250 houses on Oakley Farm directly opposite my home looking up to Harp Hill for the following detrimental reasons:

1. This is a designated Area of Natural Outstanding Beauty and should remain as is. The loss of this natural countryside opposite my home is very concerning.
2. The area is not in the local plan for housing development, therefore this would set a worrying precedent for further housing elsewhere.
3. The increased pollution as a result of the new road and traffic.
4. Traffic itself and safety is an issue for pedestrians and cyclists.
5. Speeding is already a proven issue around Harp Hill which is also dangerous.
6. The habitat of wildlife. From my windows, my family and I frequently observe numerous deer grazing in the pastures very close to our home during the morning and

evenings. We have seen many different species including badgers, bats and foxes to name a few.

7. Views, this was a contributory factor when buying my home 11 years ago when I understood this AONB could not be developed on due to points 1 and 2 above.

8. Schooling, there are already existing issues being in 'no man's land' with regard to catchments in this area. This will only increase the load trying to qualify for a local walkable Infant, Junior or Senior school.

9. The noise, mess and resultant dust during development which could impact mental well-being - particularly during these difficult covid times when employees are working from home long term.

10. Flooding, there is already an existing problem at the bottom of Harp Hill, Priors and Hales Road, the drains are blocked and inadequate as it is, so will be compounded.

45 Pillowell Close
Cheltenham
Gloucestershire
GL52 5GJ

Comments: 21st July 2020

I have been reviewing your drawing for the access to the new site planned at Oakley Farm.

(Drawing H628/02.)

Would it be possible to widen and strengthen Harps Hill, from where the Farm starts at the public footpath to the top of the hill?

Then, to slow the traffic down on the hill, move the new site entrance opposite the Battledown entrance put in a roundabout and another at the top of the hill at the junction of Greenway Lane.

Could this then help to solve the problem of Harps Hill and any disputes over the access to the site?.

2 Brockweir Road
Cheltenham
Gloucestershire
GL52 5FW

Comments: 30th July 2020

I am writing to strongly object to the outline planning application for 250 dwellings on Land at Oakley Farm, Cheltenham (20/01069/OUT). The principle of this development on designated Areas of Outstanding Natural Beauty (AONB) should not be allowed and I do not believe this site should have any development. I request that Cheltenham Borough Council refuses permission for the following reasons:

1. AONB (Area of outstanding natural beauty)

This land is designated as AONB and the proposed development will irreversibly change the character of the area. The Cotswolds AONB Management Plan 2018-2023 policies for the management of AONB land has two primary key purposes - 1) To conserve and enhance the natural beauty of the Cotswolds AONB; and 2) To increase the understanding and enjoyment of the special qualities of the Cotswolds AONB. It is an area that has such obvious and impressive natural beauty that clearly needs protecting and will essentially 'close off' an already heavily build-up area.

This is afforded the highest level of protection in planning policy terms and the National Planning Policy Framework (NPPF) states that "Great weight should be given to conserving and enhancing the landscape and scenic beauty in National Parks, the Broads, and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues." Therefore this development does not adhere to these key purposes and is contrary to the AONB Management Plan.

2. Cheltenham Plan for housing

According to Table 1 on p47 of the Cheltenham Plan, the supply of houses for the period 2011 - 2031 already exceeds the objectively assessed need. Therefore, the council should not deem this site needed and should look to areas that are less dangerous, and which do not result in the destruction of ANOB land and the environment. The need to build more houses in this area is totally unnecessary.

3. Impact on Highways, Access and Transport

The current volume of traffic to use Harp Hill has increased over time and since the development of Oakley Grange and surrounding estates. It is incredibly busy and dangerous to both road users and pedestrians alike, as an avid cyclist I used to go up this hill, but now do not feel safe to do so, along with the huge potholes that appear regularly through overuse. Any further development on this site and access will increase the risk of a significant accident. The routes from Harp Hill are similarly unable to cope, Greenway Lane backs up to the already heavily congested sixways junction. The bottom of Harp hill exits onto a small mini roundabout which does not cope with the current volume of traffic on Priors Road. Further development in this area will increase the traffic on all surrounding roads to a dangerous level.

When Oakley Grange developers applied for access to the homes to be built in 2013, they were only allowed 40 houses off Harp Hill, due to the unsuitability of the road. The remaining 270 homes must use the narrow unsuitable roads of Battledown Park to gain access to the council road network.

I would like it to be noted that there is no viable access to this site via either Harp Hill, the current access road or through Battledown Park (behind Sainsburys). This estate is constantly littered with cars parked on narrow roads and bends causing dangerous blind spots and is hazardous to both road users and pedestrians. Oakley Grange has added c.270 extra cars to Battledown Parks' roads. The roads of Brockweir and Clearwell Gardens were not designed to be access roads and cannot cope with the added traffic. The exit at Sainsburys is already congested and roads dangerous to both cars and pedestrians throughout.

4. Impact on Landscape Character, Visual Amenity

Living opposite this beautiful ANOB land I have often seen the natural wildlife that inhabits this area - Roe Deer, Muntjack Deer, Foxes, Badgers, Toads, Lizards, Field Mice to name a few along with a huge array of birdlife. If this land is developed this wildlife will be lost to this area forever.

The proposed placing of the dwellings on the development seems to be condensed to the already over-populated areas of Wessex drive, Battledown Park and Oakley Grange. This will impose a privacy loss onto surrounding residents which can be avoided by placing the buffer green space between the two estates instead. This would also shorten the road network reducing the long term burden on the council.

The environmental impact of any extra housing on this ANOB site must be taken into account as this will have a large detrimental impact on the quality of life for existing residents who not only live directly opposite the proposed development but in the surrounding area. These are, but not exclusively, loss of ANOB land, Loss of privacy, increased pollution, drainage issues, flooding and possible landslides.

5. Local Amenities:

Overcrowded schooling. Working in education I know that local schooling is oversubscribed. I don't understand how a further 250 homes will have access to these, with many families needing to travel over double the distance of local schools due to oversubscriptions. This defeats the point in our next generation being encouraged by the Government to walk or cycle to school when local education is full.

Doctors surgeries. The local infrastructure e.g doctors surgeries, shops etc would struggle and most likely not meet the needs of this proposed development. I have struggled to get doctors appointments in the area due to the local infrastructure not being able to keep pace with the houses being built in this area.

Emergency services. I suspect that any additional houses have not been factored into the emergency services funding and personnel numbers. This will, therefore, overstretch them and put lives at risk. I currently fear to need emergency services as I believe that they would struggle to reach me in an acceptable timeframe due to the overcrowding of the streets. With the addition of more housing and increased vehicles, this situation will become much worse. Is an unplanned housing estate worth the risk?

Refuse collection. Currently where I live it is a regular occurrence that the bins do not get collected as the workers run out of time due to routes being too large. The addition of yet more houses makes it significantly worse as the local council becomes overstretched with this unplanned addition to the housing plan.

Bus routes. There is no current bus network to Harp Hill or surrounding newer developments of: Battledown Park, Oakley Grange.

I, therefore, request that Cheltenham Borough Council refuses planning permission to allow any development on this ANOB land, for the reasons set out above.

36 Clearwell Gardens
Cheltenham
Gloucestershire
GL52 5GH

Comments: 30th July 2020

Living on the Oakley estate I am already frustrated with the volume of cars and lack of adequate parking for the current expanding houses and residents. Adding access to another development from Harp Hill would make this situation considerably worse. I have heard that there is potential for road access to be placed where a communal green area is currently located. This area is currently used for residents in the flats to walk their dogs and for children to play. If this goes ahead and the area is removed it will bring the estate one step closer to a concrete waste ground.

52 Clearwell Gardens
Cheltenham
Gloucestershire
GL52 5GH

Comments: 14th August 2020

I write regarding application 20/01069/OUT and wish to object to the proposal as currently proposed for the following reasons:

AONB - This is obviously a designation with significant weight in planning policy and whilst the housing opportunities on the periphery of the current urban area may be similarly restricted around Cheltenham due to AONB and Greenbelt this in itself should not be justification for development. I do not think an Outline application is satisfactory when attempting to challenge a designation as this.

Landscape/Visual: Views from Cleeve Hill and the Cotswold escarpment from within the AONB will be eroded further. I would disagree that the existing development at Oakley Grange has reduced the value of Oakley Slopes, given the topography more housing here would generate significantly larger impact than the existing development. Previous efforts to challenge the validity of this area have been rejected and I do not believe that there has been a material change with the development of the Oakley Grange site.

Access: Harp Hill and Greenway lane already act as cut through routes to avoid congestion on Hales Road. There are no footpaths once you reach the area of the proposal and the road seems quite narrow at this point.

Public services: It may not be a material consideration, but it is certainly a concern that a further 250 houses, on top of the recently constructed/still in construction development which has added a large number of new residents to this area, with no further provision of schools, doctors and the like.

4 Brockweir Road
Cheltenham
Gloucestershire
GL52 5FW

Comments: 27th July 2020

I strongly object to this application.

The area is an AONB and there is a significant threat to the ecology of this space, not to mention the disappearance of green space often used by local residents.

There is not the infrastructure to support 250 new homes, in an area that already faces traffic issues and congestion.

6 Brockweir Road
Cheltenham
Gloucestershire
GL52 5FW

Comments: 28th July 2020

This application is on an AONB which I believed to be protected for environmental reasons.

My road is significantly busier as a result of the Oakley Grange development and is only going to get worse if this development goes ahead. Traffic noise begins at 6am and late into the night which disturbs my sleep. This will have a knock on effect in terms of pollution and air quality will deteriorate.

Visually, the Oakley development benefits from views of nature and greenery which would be lost.

Building a development of 250 houses opposite the Oakley development would mean that properties would be overlooked and privacy would be reduced.

12 Brockweir Road
Cheltenham
Gloucestershire
GL52 5FW

Comments: 18th July 2020

We are absolutely horrified at the thought of someone wanting to build on that wonderful space!

Once beautifully, natural area's go there is no getting them back, you can't recreate places like that when in years to come people finally realise it was a mistake to build on them as we all benefit from them in one way or other.

All those lovely old trees the birds, deer, owls & other wildlife are amazing to see & hear, we've been lucky to see/hear them all very regularly. The Owls most evenings and seeing the sheep during lockdown has been so soothing for us all.

That's without the worry of so much more traffic, people living on top of each other isn't healthy no wonder there are ups & downs occasionally with all the overcrowding also the drains don't cope well as it is, the smell is awful when the washing machine etc are on in our area & our daughters & neighbours! (Drybrook Walk) the water board came out & put some cleaner down so it was better for awhile but then it came back.

We understand people need homes, we've got younger members of our family & they need to live somewhere but really this is a step too far.

18 Brockweir Road
Cheltenham
Gloucestershire
GL52 5FW

Comments: 27th July 2020

I strongly object to this development.

Oakley Farm Pastures is a irreplaceable AONB used by many locals and visitors. This habitats and wildlife should be strongly protected.

This area is already overdeveloped in terms of housing but underdeveloped in terms of infrastructure: schools, doctors, shops...

This will have a serious impact on pollution levels due to increased traffic and the already over congested and narrow roads.

There will also be a significant environmental impact in terms of ecology, biodiversity, geology, and flooding...

22 Brockweir Road
Cheltenham
Gloucestershire
GL52 5FW

Comments: 20th March 2021

Cannot believe this is even being considered; we strongly object!!

26 Brockweir Road
Cheltenham
Gloucestershire
GL52 5FW

Comments: 5th August 2020

I live in Brockweir Road Cheltenham on what was the former GCHQ Oakley site that existed alongside the fields forming Oakley farm. I watched the development of the site during 2009/10. Due to the extensive flooding in 2007 the developers included considerable future flooding precautions. As you know a developer has purchased the farm and ignoring the AONB status now wants to build on the land. How can we justify

having laws that are implemented after due consideration and then allow without evidently full review their reversal? At a meeting by the proposed developer held in Waddon during the summer of 2019 I questioned why the proposal was to build only on the lower slopes. Only to be told that it was easier? Had this anything to do with another builder building very expensive houses across the road from the top fields I wonder, to minimise objection? Of course the old ploy of, should they gain planning permission would then be implemented, to increase the numbers probably by a factor of two.

When I mentioned flooding considerations from across the fields into the estate below this drew a blank. Should the planning proposals be accepted who do we claim from in the event of flooding? The planners, the builders the council. The present state the country finds itself in, due the virus problems and the realisation of the importance of self sufficiency where farming is concerned makes a case for retention of any arable land. What we don't want is the removal of bands of countryside within the town of Cheltenham. This present expanse forms a "lung" for the town. Changing its use causing massive traffic problems will not enhance the environment. Or solve any housing problems. Let's use some imagination we have a farming college in Hartbury perhaps it's a facility that could be used. At the moment plenty of wild life use the fields long may it last.

12 Ledbury Court
Cheltenham
Gloucestershire
GL52 5FZ

Comments: 20th August 2020

I am writing to object to the above planning application on the grounds below:

1. Misuse of Cotswold AONB land: Oakley Farm is a beautiful area of land, which is afforded the highest status of protection, and according to the national Planning and Policy Framework (NPPF), should be a very last resort for development and then only in exceptional circumstances, and great weight must be given to its protected status during the course of planning policy decisions. Oakley and Battledown being built on former brownfield sites nearby should not be an excuse to develop AONB greenbelt land.
2. Spoiling of view from below the hill and views from above on Cleeve Hill: building over Oakley Farm would ruin the Eastern aspect of the view from the town looking up at the hill, and would ruin the views from the surrounding hills. The AONB attracts visitors to Cheltenham
 - a. The developer has hinted that they would 'open the overgrown hedgerow to restore the view', which is a disingenuous tactic, as this is a problem solely caused by their own lack of maintenance.
 - b. The overdevelopment of Oakley Farm would ruin the rural character of adjoining properties, and put huge extra demand on local roads and drainage which are not fit to deal with an expansion of 250 extra households. Indeed there are no footpaths on Harp hill above Stanley Road, and residents front gardens and verges are neither suitable, nor a right of way.

3. Flooding: currently in heavy rain huge amounts of water come down Harp Hill and flood the bottom of Priors Road from Sainsbury's all the way to the twin roundabouts at the Hewlett Arms. This also carries topsoil with it and blocks the drains, exacerbating the flooding, which is already a danger and inconvenience to motorists and pedestrians passing through as well as residents' properties along the road.
4. Wildlife: as a resident of Oakley, I have seen all kinds of wildlife make use of the Oakley Farm slopes, including badgers, deer, foxes and birds or prey. This application would deprive protected wildlife of important habitat.
5. Further disingenuous planning tactics by the developer: the full details of the plan have not been made public, and concessions at this stage made in ignorance would be the thin end of the wedge.

I hope you will refuse the application on these grounds. The site is not suitable for development.

11 Ledbury Court
Cheltenham
Gloucestershire
GL52 5FZ

Comments: 4th August 2020

Cheltenham Borough Councils Cyber Central project to the West of the town will create thousands of new homes. Let us leave the East of town and AONB alone now following the development of the brown field former GCHQ site. The views from across Oakley Farm Pastures Slopes and up towards Cleeve Common should be protected for everyone to enjoy, now, and for future generations.

9 Ledbury Court
Cheltenham
Gloucestershire
GL52 5FZ

Comments: 6th August 2020

I wish to strongly object to the proposed building of 250 homes in an area of outstanding natural beauty, in line with others a few the reasons are:

My home overlooks the site and my garden backs onto the proposed development. I am extremely disappointed with the proposals and visual impact the proposed development will have on me. The loss of the views I have across the fields and the wildlife that I regularly see including roe deer, muntjac and bats. I am also concerned about the loss of the hedgerows and the many mature trees on the site.

Being so close to the development an extra 250 houses will cause a great disturbance. The proposals have houses extremely close to my property. With the site being a hill, they are likely to be higher than my home and therefore overlooking my garden negatively affecting my privacy.

The roads around this area are already busy and congested. Another 200-500 cars on Priors Road and Harp Hill will have cause this congestion to be even worse. The traffic at a standstill on these roads during rush hours will release huge amounts of harmful gases into the atmosphere substantially increasing localised pollution levels. The footpaths on Harp hill are extremely narrow and in places non-existent. There are no footpaths on Greenway Lane. While walking in this area with a pram we have to walk on the roads. It feels unsafe at the moment without the extra volume of traffic on the roads this site would lead to.

Finally, I have huge concerns regarding flooding. There are already floods from the runoff from Harp Hill with any heavy downpour. The extra runoff from this site would potentially make this situation worse and dangerous. Also, with the sloped nature of the site it is likely that there would be runoff down the hill towards my home and garden.

6 Ledbury Court
Cheltenham
Gloucestershire
GL52 5FZ

Comments: 29th July 2020

I am unable to support any planning application that take away an area of outstanding natural beauty from the countryside. As a neighbour to the development, I currently can see an array of wildlife, birds and protected trees who contribute to our local environment and improve the mental and physical health of the local residents.

According to the site plan, instead of the deer that I have seen since I moved in to my property, I will have someone's house and garden backing on to my property. Due to the gradient of the hill, the house and garden of that property will overlook my garden and house, and my privacy will be invaded.

The plan does not include any additional public transport routes and the ones that exist are not accessible for those who are unable to climb the hill. This means that there will be a reliance on car travel and the roads - especially the double roundabout at the bottom of Harp Hill, cannot not support any more cars.

Locally, there has been a real struggle on availability of local school places, the doctors surgery (which struggles according to their CQC report and their patient feedback to provide enough appointments and access to doctors already due to their number of patients already), access to dental services (closest NHS dentist with availability is in Tewksbury) and other public services.

It is not in the best interests of anyone except the developers to proceed with this application. Any extra housing needs should be build on brownfield sites not AONB. It is sad that the council have allowed the developers to go this far already and I only hope that they can see sense and reject this plan.

5 Ledbury Court
Cheltenham
Gloucestershire
GL52 5FZ

Comments: 24th August 2020

I'm writing to say I strongly object to the above planning application.

This area is AONB and we should stand by our promise to protect these areas. It's a mistake to fill in all our green areas outside the towns with buildings.

We can see a move away from shopping in towns to shopping online. All of these empty shops and buildings in the town would make ideal dwellings for people. If we fill in the green space around the town it will be lost forever - literally killing our air quality, taking away space to walk and breathe to help with mental health, making exercising our dogs and getting our children out more difficult or meaning that these have to be on pavements beside cars.

Prioritise existing buildings in the town and then brown field sites if we have to.

Driving along Harp Hill is already narrow and with the parked cars at the bottom, causes a bottle neck down and onto the mini roundabout at the bottom. If you have regular experience of driving along this road you'd know that extra houses needing to use this route would not be sensible.

Living behind the fields in question, the diversity of wildlife and birds is truly amazing - deer, rabbits, moles, owls. We should take great care not to lose habitats for our local wildlife.

Comments: 15th December 2020

We live adjacent to the proposed development site and are writing to ask that the council refuse this planning application.

I think primarily my objection is because this is a green field site with wildlife visible across large parts of Cheltenham and more importantly within the Cotswolds Area of Outstanding Natural Beauty and designated for conservation - this site should have a high level of protection from being built on.

The proposed houses, built on a steep slope at the bottom of our garden will loom over our house and block out light to our garden and house. Also, inline with modern built estates and also built on a steep slope at the bottom of our garden will no doubt be visually overbearing from our house.

Access by the Estate or via Harp Hill is already narrow and problematic, with parked cars and used heavily in rush hour. To build 250 more properties with potentially 500 extra cars tipping onto these already busy roads will no doubt cause traffic problems and create a safety hazard for other motorists and pedestrians.

I understand from our local Cllr that there are also concerns around flooding.

Therefore, we ask that the Council refuse this Planning Application and if necessary encourage the builder to look at a building design that is smaller, less intrusive on

neighbouring properties, and fits in within the original site of the buildings of Oakley Farm.

4 Ledbury Court
Cheltenham
Gloucestershire
GL52 5FZ

Comments: 6th August 2020

We would like to submit an objection to this new development.

The local community cannot withstand more houses, which will provide a further increase in traffic and pollution. The roads and footpaths are already in bad condition and not maintained.

The local schools and health services are going to be impacted further.

Another AONB area will be removed from Cheltenham, one of the many attractions, impacting on current wildlife.

Building in this green space will impact upon the privacy of many current households and the new dwellings.

4 Bream Court
Cheltenham
Gloucestershire
GL52 5FY

Comments: 3rd August 2020

I would like to object to the planning proposal on Oakley Farm pastures for the following reasons.

1. As a protected area of outstanding natural beauty under new government guidelines on planning permissions, whereby areas of growth and renewal will have planning proposal speeded up and areas that have protection such as AONB and Green Belts will have increased protection, I fail to see how this planning proposal can continue.

<https://www.bbc.co.uk/news/uk-53625960>

2. I fully support the council using brown field sites to develop new housing on. As a resident of Oakley Grange, the former GCHQ site, it would be hypocritical of me to condemn new housing developments. However, when there is a brown field site, already with planning permission less than a mile away from this planning proposal, on Bouncer's Lane, I find it hard to justify the need for another new build development in the area on protected green fields land.

3. With new developments aimed at growth near Swindon village and the cyber development near GCHQ, I am encouraged that CBC are taking great strides in meeting the housing requirements for the town. Making the need for permanently destroying AONB an unnecessary act.

4. The addition of 250 homes will bring an increase of at least 250-500 additional motor-vehicles onto Harp Hill, which already struggles with the flow of traffic due to its narrow width. The roundabout junction that joins onto priors road is not fit for purpose to meet the increase in traffic, and the whole road system would not be able to cope with an additional traffic light system. Any minor road works cause huge delays already. Any changes to the road layout and increases in traffic will cause major gridlock and cut off a main access point into cheltenham from north east Gloucestershire. There is also a school on harp hills whose access will be severely affected. The current parked cars on Harp Hill, with the increase in standing queueing traffic will create significant difficulties for the emergency services should they need to access that road.

5. The school system in Cheltenham is not sufficient, especially in the Harp Hill area. An increase in houses will only suffocate an area that is already struggling to meet the demand of what is currently in place.

Thank you for taking the time to read my objections to the proposed planning.

2 Bream Court
Cheltenham
Gloucestershire
GL52 5FY

Comments: 3rd August 2020

Please protect these pastures and recommend building on sites that are less sensitive.

Oakley Farm Pasture Slopes - AONB is the site of a diverse wildlife habitat. Badgers, deer, foxes, bats, reptiles and insects are frequently seen within this area and deserve our protection of their sensitive and established habitats.

The site is home to a vast number of trees and hedgerows including 39 Oaks, Hawthorn, Maple, Ash and Sycamore, most of which are now protected by a Tree Preservation Order applied to the land after felling was carried out. Many of these trees are mature and form magnificent silhouettes across the AONB vista, as well as provide essential habitats for wildlife.

Furthermore, I can't imagine how the roads will be able to cope with 200-700 more additional cars and please also consider the impact on the commute to work/school.

Your decision will have a significant environmental impact , the local infrastructure and the life of people living in Cheltenham.

I urge you to reconsider!

Comments: 3rd August 2020

I most strongly object to any consideration being given to this application as it is a 'protected area of natural beauty' within the bounds of Cheltenham Borough Council.

To permit development would increase the already congested roads, and have significant impact on my commute to work.

Please register my objection and notify me if there are further discussions

1 Ledbury Court
Cheltenham
Gloucestershire
GL52 5FZ

Comments: 21st July 2020

I strongly object to this development.

As everyone else previously has stated, the area cannot support such a large development of houses, in terms of infrastructure, schooling, doctors surgeries etc.

The roads are already a mess, both physically and traffic volume. Harp Hill would not be able to take such a drastic increase in residents and cars.

The schools are full beyond capacity.

This is already a heavily populated area, with an unfinished and unsold estate on Oakley Grange. The addition of 250 houses is completely unnecessary. It is 100% pure greed, and not with the residents or the nature of the area in mind at all.

The water run off and flooding has become an increasing concern as more and more houses are built on the hill.

Not only will it be a huge hindrance, eyesore and inconvenience, most importantly it will be irreparably destroying an area inhabited by wild life.

12 Fairford Road
Cheltenham
Gloucestershire
GL52 5FQ

Comments: 28th July 2020

I strongly object to the planning proposal 20/01069/OUT for the following reasons:

1. AONB. The fields backing on to Ham and Harp Hill are rife with an abundance of wildlife which is a joy to see and hear. 250 dwellings will no doubt threaten the survival of Owls, Deer, Badgers and more. Is there really no other housing solution within Cheltenham and the surrounding area that means it is necessary to destroy green sites? With the recent lockdown still fresh in mind, the countryside has been more important than ever in terms of Mental Health and exercise.

2. Congestion on the thoroughfare of Greenway Lane and Harp Hill. As a nearby resident for the past 3 years I have noticed the traffic increase exponentially in this area. As a runner and walker of nearby routes along Greenway Lane and Ham, I have personally felt in danger by oncoming vehicular traffic on numerous occasions. To add a further 250-500 cars to this already congested area would be disastrous and potentially fatal.

Additionally there is no bus route via Harp Hill and Greenway Lane so therefore the transport usage from the new development would primarily be vehicular traffic.

The bottom of Redmarley Road is also a danger to oncoming traffic and pedestrians as a result of cars parking on yellow lines outside Sainsbury's which is never enforced. No doubt this would only be exacerbated by further strain on the local road infrastructure and Sainsbury's itself.

3. Overcrowded schooling. I have heard from many neighbours and friends around local schooling which is oversubscribed. I don't understand how a further 250 homes will have access to these, with many families needing to travel over double the distance of local schools due to oversubscriptions. This defeats the point in our next generation being encouraged to walk or cycle to school when local education is full.

Overall, I strongly object and hope Cheltenham Borough Council reject this application.

14 Fairford Road
Cheltenham
Gloucestershire
GL52 5FQ

Comments: 5th August 2020

I would like to object to the planning application for the following reasons:

- The site is currently an Area of Outstanding Natural Beauty (AONB), of which the National Planning Policy Framework (NPPF) refers and states that planning should be refused unless there are exceptional circumstances. Given that there are a number of brownfield sites available for development in Cheltenham, just over 30 in 2019, and sites that are within the Joint Core Strategy (JCS) Area (and within the Principal Urban Area of Cheltenham), these should be exhausted before looking to protected areas; this AONB should continue to have the highest level of protection. To develop on the proposed site also conflicts with the JCS.
- Development on this site would be detrimental to the wildlife that currently live there. Personally, from my property, I have often seen deer in the field near Bream Close, bats in my garden in the evening, and heard owls at night. In addition, as George Eustace (Environment Secretary) said in his speech on Environment Recovery (20th July 2020), "We know that a connection with nature contributes to well-being, and improved mental health", and I agree. Developing on this land would impact us as a household, we would lose our current connection with nature.
- The visual amenity would be damaged. Currently the site contributes significantly to the countryside feel of the area. For example it can be seen from Priors Farm Playground, where views to the South and East are largely countryside, with the exception of the Oakley Grange development (which had previously been occupied by GCHQ). Allowing development on the proposed site would severely damage the views, making the whole of the South view from the field an urban view and therefore significantly changing the character of the area.
- Residential amenity would be spoilt. Currently my household enjoys quiet evenings with little pollution. Allowing development on the site would add to noise as there would be many more households in the area, and pollution would increase due to more households having more cars. Also, having the green open space nearby provides an open countryside feel. Developing on the land will make the area more urban and therefore more oppressive.

- The Grade II Listed Pavilion on Hewlett's Reservoir can be seen from various points across Oakley Farm Pasture Slopes. The view and setting of this historic monument should be conserved and protected.
- I cannot see anything that refers to advice from the Cotswolds Conservation Board. Given that the Cheltenham plan states it will be guided by the board, the professional opinion of this organisation should be followed.
- Cheltenham Borough Council commissioned a 'landscape assessment' (the Ryder report) in 2015, which identified the importance of the site, its sensitivity and inappropriateness for development. This guidance should be followed both because it is an independent objective report, and also because public money has been spent on it.

You are welcome to visit my home if it helps in any way.

9 Bream Court
Cheltenham
Gloucestershire
GL52 5FY

Comments: 25th July 2020

Please do not grant permission for this application. This area has seen significant residential development in the last few years but has seen no development in infrastructure (housing, doctors surgeries, road layouts etc). Levels of wildlife are beginning to increase following the most recent developments and further construction will again impact this. Recent events have shown that green spaces are needed more than ever. Cheltenham has large brownfield sites that should be renovated before expanding on to green field areas.

3 Highnam Place
Cheltenham
Gloucestershire
GL52 5FX

Comments: 5th August 2020

Objects

One of the reasons we chose our home in Highnam Place was due to its location. Along with the houses in Bream Court, Ledbury Road and Birdlip Road, our home is within and adjacent to the AONB pasture slopes of the proposed development but built on the Brownfield site that was formerly GCHQ. All our living and some of our outdoor space is on the first floor facing out towards the pastures. The proximity of the buildings on the proposed masterplan to our home would represent a severe encroachment on our privacy and view, although we understand we have no entitlement to a view, we can expect that our privacy should not be compromised. We, along with other homeowners who would be similarly affected by the proposed development also have concerns over the impact that it would have on the value of our homes.

The proposed site is designated as part of The Cotswold AONB. For over 50 years it has been protected as a very special landscape that should be conserved for everyone now and in the future to enjoy. Trees and hedgerows which are essential to the survival of the

various wildlife species that have made this habitat their home, would be destroyed forever.

Harp Hill cannot easily sustain the volume of traffic that already uses it and it was never intended to be able to carry heavy traffic. On daily commutes to and from Charlton Kings and Leckhampton, the junctions at Hewlett Road and Sixways are already a bottleneck at peak times, with resultant major delays. To increase this load by a further potential 500+ vehicles would be ludicrous to contemplate. The increase of pollution at peak times is unsatisfactory already, due to the overdevelopment of this area of Cheltenham already. Parents and children walking to & from schools and nurseries along Priors & Hales Road are already exposed to harmful pollutants associated with vehicle emissions during such busy commuting periods, and a substantial increase in vehicular traffic is only going to make matters worse. Persimmon homes were restricted in their planning for the Oakley Grange site to only allow fewer than 50 houses to have access off Harp Hill. Their site is still not finished, so there is still the potential for a small increase in the traffic flow on Harp Hill. However, of equal concern is the fact that a larger part of their incomplete development will consist of homes that will be accessed from the Battledown Park junction with Priors Road, which is already heavily congested during peak times. As a consequence, this will result in still further congestion at the already busy junctions at Hewlett Road and Sixways.

It is fairly well acknowledged that this attempt to access the AONB site via Harp Hill may be anticipated to meet with opposition, and there will be a plan in place to appease planners by suggesting an alternative which would be to access the site through Pillowell Close, or another access point within Battledown Park. Perhaps the applicants are relying on the fact that a willingness to negotiate may give them the result they are seeking. However, there should be no attempt made to access this development through either Harp Hill or Battledown Park. This estate is dangerously overcrowded with vehicles for which there is a woeful lack of available parking and wholly unsuitable access roads that would increase the likelihood of a serious accident, most likely involving children.

Development at Sainsburys & Oakley Grange has already had a detrimental effect on the ability for land to drain without flooding. The junctions at Wessex Drive, Priors Road, and Whaddon are regularly flooded across the entire width of the roads. This then results in regular further flooding in Hewlett Road, near to its junction with Pittville Circus Road. Any increase in development would put further strain on flood issues in these areas.

This will be exacerbated further by the new development on the Premier Products site at Bouncers Lane. Building at this location is due to start very soon, and I understand that already the developers have succeeded in increasing the original number of permitted dwellings by nearly 30%.

You will be aware that Cheltenham prides itself on being known as the Centre of The Cotswolds. Does it want to be the town that sets the precedent for the destruction of part of the nation's precious AONB for the benefit of financial gain? Or better, should it be known as the town that clearly conveys the message that rules are not to be blatantly disregarded, and our AONBs should not and cannot be touched, however high the price.

The UK's Housing Minister Robert Jenrick's recent planning reforms clearly convey that land designated as AONB will be protected from development. His published article states "...our green belt, areas of outstanding natural beauty and rich heritage - will be

protected as the places, views and landscapes we cherish most and passed on to the next generation as set out in our manifesto".

Cheltenham Borough Council has published that "...the supply of houses for 2011 - 2031 already exceeds the need as outlined in the recently agreed Cheltenham Plan for Housing".

This proposed development challenges the rules determined by both our current Housing Ministry and those which are designed to protect the officially designated AONBs of which this country is so proud.

What possible justification can there be for allowing such rules to be so blatantly disregarded?

47 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 29th July 2020

I would like to raise the following objections to the proposed development of up to 250 new houses on the land at Oakley Farm, Harp Hill, Cheltenham.

1) It has been designated as an Area of Outstanding Natural Beauty. I understand that great weight should be given to conserving and enhancing the landscape and scenic beauty in AONB which has the highest status of protection. It will require the relocation of wildlife ie deer and involve the disappearance of the current wildflower meadows.

2) Eden Villas were built on a brown field site that was GCHQ. The reason it was not joined to the Oakley Grange estate was that Harp Hill would suffer from the increased traffic. At the moment, Harp Hill is used as a short cut for traffic between Prior's Road and Charlton Kings and is very busy particularly during rush hour.

3) The development would impact on the increased number of walkers and cyclists who use Harp Hill to access the many footpaths in the area and is one of the main routes to access Cleeve Common, since lockdown was introduced. The lack of a footpath and several blind bends make it dangerous for families with children and also for drivers.

4) The houses recently built at Eden Villas overlooking the site have living accommodation on the first floor. Consequently, the current plan for the new houses on Oakley Farm will severely impact the outlook and privacy of these homes and it is important that the planning officer visits 43,45 and 47 Birdlip Road. These homes were a distinct improvement on the old GCHQ site whereas homes on a greenfield site will blight the open aspect of the escarpment and will be easily visible from Cleeve Common and the surrounding area.

I hope you will consider my objections and decline planning permission.

45 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 29th July 2020

I am writing to object very strongly to the proposed development of up to 250 houses on Oakley Farm Pastures (20/01069/OUT).

My property backs onto these pasture fields, and both are located entirely within the AONB. I would like to talk firstly about the "Report of Community Engagement" which is a document included in the planning application on Public Access. I would like it to be noted, that the notification letters to residents gave very short notice of the public consultation opportunity (a matter of days) and some of the residents most severely affected by this potential development were not notified by letter at all.

I went to the consultation meeting and raised my concerns about the adverse impact on the outlook from my property which would result from this development. (I am well aware that a private view is not normally a planning consideration). A response, recorded by the applicant was that existing trees and boundary vegetation would be retained and where poor or non-existent would be supplemented to protect visual amenity and the rural setting of residents within the residential area generally. I was reasonably reassured. Their published site plan on public access was therefore shocking.

While understanding that if the outline application is approved, the finalising of the site plan will come later, I feel it is very important to ask for my concerns below to be placed on your records for consideration now. These concerns are summarised as follows:

I am appalled that the applicant has, despite their reassuring words at the public consultation, shown little genuine consideration for the residential amenities and outlook of those properties in closest proximity to this proposal, for example those on Birdlip Rd, Ledbury Court and Breme Court. The applicant has assessed the effect of the development on the properties closest to the proposal as having "medium" sensitivity and a "medium" magnitude of effect. The significance of effects are also assessed as "moderate adverse" where in fairness must surely be major adverse.

The site plan shows my house and garden and those of my immediate neighbours being dominated by the side elevations of two large houses, in other words, "solid brick walls" which will presumably be "camouflaged" by small slow growing trees which will eventually further compromise the current openness afforded to our main living areas and gardens. These "brick " walls are situated very near to my garden boundary. Neighbouring properties have their living areas and their main family outside space on the first floor. Their outlook and privacy will be severely compromised.

I do hope and indeed ask, that either the applicant reflects on the lack of care and consideration shown to local residents and changes the plan or, even better that in the worst case scenario, conditions be imposed by the council such that our properties will be given the same "swathes of green pasture space" to protect our outlook and privacy as that indicated on the plan as being afforded to the properties on Harp Hill.

I would also like to ask for and gain some reassurance from you, that no recommendation will be made until a site visit has taken place at my property and perhaps my neighbours.

Additionally, despite submitting an extremely lengthy Environmental Statement, the applicant, in my mind does not manage to justify any exceptional circumstances where it can be demonstrated that the development is in the public interest (NPPF para 172) or have any robust evidence of local need arising from within the AONB (Policy CE12 Cotswolds AONB Management Plan). This site falls outside of the PUA and is not included in the Development Plan.

Finally, the proposal would also have a significant adverse effect on wildlife, traffic, (even if access is changed to an alternative location which is possible), landscape, Cheltenham's setting and most especially the potential loss for ever of this protected area of the AONB.

43 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 14th August 2020

Letter attached.

41 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 10th August 2020

I wish to strongly object to this outline planning proposal for the following reasons:

1. The proposed site is an AONB (Area of Outstanding Natural Beauty). According to the national Planning and Policy Framework (NPPF), the development of this area should be a very last resort and then only in exceptional circumstances. The urbanisation of Oakley Farm and the general over-development of areas such as this, which can be seen from the surrounding AONB, would be detrimental to the community, which thrives on its proximity to this green space.

2. Wildlife - this is a habitat for an abundance of wildlife with a great many sightings of deer, badgers and bats. I don't believe it is right to force the wildlife to relocate because of this unnecessary development.

3. Traffic - Harp is congested enough already with the traffic currently using it, adding a minimum of a further 250 vehicles is untenable.

4. Pedestrian and other road users safety - Harp Hill has no footpaths after Stanley Road and in parts is narrow and dangerous. The bend at Hewlett's Reservoir is particularly dangerous, where there is insufficient room for two large vehicles to pass each other

safely. Pedestrians' and children's safety must be paramount when considering development of any kind, and Harp Hill is just not suitable.

There are so many other areas for objection, and I am frankly staggered that it is even being considered

32 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 3rd August 2020

I am writing to object to planning application 20/01069/OUT, Oakley Farm Pasture Slopes. I offer the following views and opinions for your consideration.

Policy L1: Landscape and Setting, Cheltenham Plan. "Development should only be permitted where it would not harm the setting of Cheltenham including views into and out of areas of acknowledged importance.

Part 6 (Landscape and assessment) of the applicants Environmental Statement repeatedly categorises the "adverse impacts" of this proposal. The term "adverse impact" in itself infers harm to this area of acknowledged importance.

I frequently walk my dog in this area and know that views of Oakley Farm Pastures can be clearly seen from areas such as the Cotswold Escarpment, The Cotswolds Way and other popular local footpaths within the AONB.

Policy SL1: Safe and sustainable living. Development will only be permitted where it would not harm the amenity of adjoining land users and living conditions in the locality.

Although only an outline application, the applicants current site plan has shown no consideration for the residential amenities and outlook of those properties in closest proximity to this proposal, for example those on Birdlip Rd, Ledbury Court and Brema Court. The site plan shows gardens being dominated by the side elevations of houses. Some of my neighbour's properties have their living areas and their main family outside space on the first floor. Their outlook and privacy will be severely compromised. Conditions need to be imposed now to protect the amenities and living conditions of neighbouring properties in the future.

AONB

The applicant refers repeatedly to the pastures (which sit entirely within the AONB) as being surrounded or contained by residential development.

It should be noted that the AONB boundary in this area was set in 1966, when this landscape with its sloping pastures, hedgerows, and wonderful oak trees was acknowledged as an area of importance. In 1990, the boundary was reconfirmed and expanded to include the most western field of Oakley farm despite being bordered by residential areas and the huge and ugly MOD buildings of the old GCHQ site. Housing which was in situ then and housing which has more recently replaced the MOD buildings should not be used as leverage to mitigate development. Little has changed in over 50 years in terms of the built environment.

Finally, this land in the AONB, it is not in the Cheltenham plan or Joint Core Strategy so has not been identified as an approved site for development and as such decision makers should adhere rigorously to NPPF policy and the Development Plan. In accordance with the Cheltenham local plan, the council should take guidance from the Cotswold Conservation Board and ensure the proposal is consistent with the policies set out in the Cotswolds Management Plan.

26 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 6th August 2020

I object to the above proposal for the following reasons, please read my comments and take them into consideration.

1. This is an ANOB so I am unsure why this is even being considered, the proposed housing development will destroy the natural landscape which is much appreciated and has been enjoyed by the wider community.
2. The building development will destroy the wildlife habitat.
3. Harp Hill is a narrow road with narrow or no pavement which cannot cope with any extra traffic and any increase in traffic will pose a danger to walkers/cyclists and create traffic chaos in rush hours.
4. The local amenities cannot cope with the additional residents.
5. Harp Hill is in a shocking state at the moment with much needed repairs to be done if you add more traffic to this you are simply making the situation worse.
6. The Charles Church development is still not complete and the heavy duty traffic makes Harp Hill overcrowded and unsafe already with ohhh adding more construction traffic to it.
7. When I bought my home it was under the premises Harp Hill would have no more access for new homes.

39 Birdlip Road
Cheltenham
Gloucestershire
GL52 5AJ

Comments: 6th August 2020

I have great objection to the proposed development.

Along with the damage to the AONB the biggest problem generated would be the traffic and impact to the surrounding area(s).

In a previous planning decision (13/01683/REM), the number of houses that were to be accessible on the old GCHQ site from the top of Harp Hill (now Birdlip Road) was specifically limited to a number of dwellings (I believe 44) in order to protect the traffic level on Harp Hill. To now allow 250 dwellings that would effectively use the same roads that was a problem before would be illegitimate if not ludicrous.

The roads in question are narrow, often blind, always have cars illegally parked and have little or no pavements causing dangerous situations for walkers and their sometimes young children. Not only would this proposed development increase the number of cars and therefore increase the level of danger, it would also increase the number of walkers and their families which would also increase the level of danger.

Harp Hill is meant to provide access to local properties and for the recreational users of Cleeve Hill, it is not designed as an A-road, not even a B-road. Adding a single access point on this road for 250 more dwellings will over saturate the local road network.

I sincerely hope that common sense prevails on this application,

Golspie
Harp Hill
Charlton Kings Cheltenham
Gloucestershire
GL52 6PX

Comments: 12th August 2020
Objections to Planning on Oakley Farm Pastures

I object very strongly to development on the AONB land at Oakley Farm Pastures and to the use of Harp Hill as the main access road.

- An increase of around 700 cars regularly using a road that is already congested at peak times will be untenable. Harp Hill is not wide enough to cope with even more traffic, cars parked at the side of the road mean that traffic is unable to move in both directions so cars are forced to wait until the road is clear. An increase in the number of vehicles idling on the road will exacerbate air pollution.

- The pavements become narrower towards the top of the hill and there are no footpaths at all beyond the Stanley Road turning. This is already hazardous for the many pedestrians, cyclists and runners who enjoy using Harp Hill.

- The volume and speed of the traffic on Harp Hill forces people to park partly on the pavement (where there is a footpath) so that pedestrians, people with prams and wheelchair users have to walk on the road which is unsafe.

- At busy times when the traffic is moving there is a tendency to speed up and down the hill. There have already been a number of accidents on the road and a lot of broken wing mirrors. Increased traffic is very likely to cause far more serious accidents and poses a danger to lives.

- More traffic would be forced along Greenway Lane, another narrow road that for the most part has no footpaths. Traffic waiting at the London Road lights would increase, causing even more air pollution.

- It is already difficult for many Harp Hill residents to get in and out of their drives, increased traffic will make the situation more dangerous. This will also affect users of the Battledown Centre and the Hewlett Arms.

I also object to any form of development in a designated AONB as we cannot afford to lose such a beautiful space.

- Government policy allows housing estates to be built on AONBs only in exceptional circumstances. This site was not identified as suitable in the Cheltenham Plan. There is no reason for the Oakley Farm pastures to be developed, a more suitable Brown field site could be chosen.

- There is regular flooding on Hales road and Priors road at the bottom of Harp Hill, the existing drainage is already inadequate. In past years our garage has been flooded several times due to surface water washing down the road.

- As a keen walker I have enjoyed many sightings of deer, badgers, foxes and swarms of bats in Oakley Farm Pastures. These animals also visit our garden and we have felt privileged to live in a semi-rural location. Wild animals would lose their habitat.

- Local schools, Doctors and Dentists are already overstretched in this area and the situation would be made worse by building such a large number of houses.

Please refuse any development of this site, there would be of no benefit whatsoever to local residents and it would cause misery and traffic chaos.

124 Horsefair Street
Charlton Kings
Cheltenham
Gloucestershire
GL53 8JT

Comments: 13th August 2020

I wish to OBJECT to the above planning application on the following grounds:

1. This development would be within the AONB and I do not believe that the AONB designation can have any meaning or value if new housing development is allowed within the area. If it is, such areas will be slowly chipped away with previous developments cited as precedents - the 'thin end of the wedge' approach beloved of developers everywhere.

2. Apart from the general point, this has a direct and deleterious effect upon local residents and tourists who value Cheltenham and especially Charlton Kings as 'the gateway to the Cotswolds', affecting as it would views to the West from the extensive network of footpaths near Greenway Lane, Mill Lane and the Hewletts area. Perhaps that is why the area is in the AONB in the first place?

114 Fairview Road
Cheltenham
Gloucestershire
GL52 2ER

Comments: 13th August 2020

I am writing to you to object to the building proposal with the reference: 20/01069/OUT.

The proposed building works should not in my opinion be built on an AONB especially one on which has a fair bit of wildlife. The building works will also change the visual appearance of the area significantly when walking on the surrounding hills.

The increased traffic up the hill will cause more exhaust pollution and also increased brake dust particulate on descending the hill, causing lower quality air in the area that is used frequently for exercise and access into the hills. This could be compounded due to the road having a small pavement only partly of the way up, causing pedestrians and vehicles being closer than usual.

Thanks for reading

Battledown Court
Oakley Road
Cheltenham
Gloucestershire
GL52 6NZ

Comments: 13th August 2020

This development would be absolutely NOT WELCOME.

This is an important AONB green breathing space for Cheltenham.

Harp Hill is already badly vehicle-clogged in its lower reaches.

Speeding on Harp Hill will only get even more dangerous.

The roundabout at Priors Road is already very hazardous.

Will we get the lovely 'open space' and trees on your sketch?

No, we'll get a horrendous packed-in-tight rabbit warren

- just like the Battledown Park development to its north.

It's all RUBBISH! You must not allow this to go ahead.

We support the Battledown Estate Trustees in their strenuous objection.

3 Albert Court
Albert Road
Cheltenham
Gloucestershire
GL52 2TN

Comments: 29th January 2021

I oppose this proposed development at Oakley Farm Pasture Slopes. I support the arguments that others have put forward against this development, for example in the detailed response by CPRE. There are two main aspects that I would like to stress.

1. This Area of Outstanding Beauty should remain protected

Cheltenham is fortunate to have this AONB so close to its centre. It can give pleasure to people in the town looking up to the hills. Alternatively, people can easily walk from numerous parts of the town and, when half-way up Harp Hill, feel that they have reached wonderful countryside. Particularly in the time of Covid restrictions, this has been a well-used source of solace (including for myself as a resident of Pittville). Although some of the aspect to the north of the road would be preserved by these plans, that is insufficient for the area to retain its rural character, especially with the amount of traffic from the 250 houses using the proposed new junction on Harp Hill.

2. Surrounding roads are unsuitable for the additional traffic that would be generated.

Currently Harp Hill and Greenway Lane are used as a cut-through between town and the A40 eastwards, in order to avoid traffic congestion from Six Ways along London Road and up Hales Road. As such Harp Hill and Greenway Lane have for years been unsuitable for that level of traffic especially at start and end of the working day (I talk from experience, having lived on Harp Hill and on Greenway Lane near the traffic lights). Examples of unsuitability are:-

- o The mini-roundabout at Hales Road-Harp Hill-Priors Road is a traffic bottle-neck.
- o Harp Hill is very steep in places with poor visibility.
- o There is danger due to a sharp left bend at the top of Harp Hill shortly followed by a right-turn into Greenway Lane (where I have witnessed numerous near-misses).
- o Greenway Lane is narrow and has continually suffered from degrading of road surface.
- o Additional congestion at Six Ways is caused by traffic volumes coming out of Greenway Lane, especially when full use of the green light out of Greenway Lane is prevented by vehicles parked on the road near the traffic lights.

Problems such as these are exacerbated by vehicles wishing to travel at too high a speed (which led to the introduction of the two single-file flow restrictions in Greenway Lane).

These problems have been acknowledged for many years. The situation would be so much worse with the additional traffic that this proposed development would cause.

3 Albert Court
Albert Road
Cheltenham
Gloucestershire
GL52 2TN

Comments: 29th January 2021

I wish to object to the planning proposal to build 250 homes on the Oakley Farm site.

This proposal counts as inappropriate development on an inappropriate site. The area abuts an area of outstanding natural beauty (AONB) which makes a positive contribution to the environment of Cheltenham. The fields and hills can be seen by at least half the population of the town and beyond. We do not have the right to spoil this beautiful view

for future generations. At the moment it is possible to walk from the town, up Harp Hill to enjoy the views from the Oakley Farm fields. Periods of lockdown during the Covid-19 pandemic have encouraged many more people to walk and enjoy the experience. You cannot take this recreational opportunity away from them.

Apart from the adverse environmental effects on the landscape, there are other important issues:

Road safety, increased traffic and pollution

As someone who has been walking on Harp Hill throughout lockdown, the road is already busy and dangerous with some cars travelling at great speed. The traffic generated by any further housing development would exacerbate this. Where would the traffic end up? Hales Road and Greenway Lane have long queues of traffic waiting at traffic lights. Any increase in traffic would result in unwanted extra pollution levels.

Flood risk

For every new house built there will be an increased flood risk. Rainwater collects on the surrounding hills and needs to flow somewhere. In this situation, I am not sure any builders' flood alleviation scheme would be good enough to deal with the increasing amounts of heavy rain our country experiences.

Protection of wildlife

For the wellbeing of future generations, we do not have the right to obliterate fauna and flora from the landscape

Listed building status

Hewlett's Reservoir and its pavilion are both grade II listed monuments. They deserve a sympathetic setting.

Fermain
Ashley Road
Cheltenham
Gloucestershire
GL52 6PG

Comments: 21st August 2020

There are many reasons why this development should not go ahead, and all reasons have previously been highlighted in the objections.

1. AONB - there are many brown field sites within the local area which should be developed prior to anyone being able to consider building on land such as this.
2. Access to the site would be via Harp Hill which is a very steep hill. Most of the road is very narrow and due to it's proximity with housing located along the full length of the road to the left and right it cannot be widened. It is already not suitable for the traffic that speeds down it. Parked cars at the bottom make this hazardous to navigate with current traffic levels.
3. The local infrastructure cannot cope currently. Both doctors and schools over subscribed, this would only make this considerably worse.

There are many other reasons why this should not be granted planning permission, but these are just my top 3.

38 Pinewood Close
St Albans
AL4 0DS

Comments: 21st January 2021

Although we don't actually live in Cheltenham, we do visit our son there. We regularly enjoy exploring and walking in the local areas to where he lives.

We would strongly object about the proposed development of building up to 250 homes at Oakley Farm, Priors Road, Cheltenham with the main vehicle access from Harp Hill as this would have a widely negative impact on that area of AONB. Other factors such as the high risk of potential flooding, especially with the changing weather, creating heavier and more constant rainfall, will create a major problem in the future. This should be considered before it's too late!

Also this development would create a high threat to the habitats of wildlife at Harp Hill and surrounding areas. We would ask that more thoughtful consideration be made to other more viable and suitable sites.

18 Haywards Road
Charlton Kings
Cheltenham
Gloucestershire
GL52 6RH

Comments: 18th July 2020

My grandfather lives opposite this and it would be such a shame for all of the green space to go. It will become so busy over the hill, it is already busy and dangerous enough trying to get out of your drive. It will also unfortunately "lower the tone" of the overall area which is a prestigious and sought after place in Cheltenham. It will no longer have exclusivity and we very much object this.

16 Sycamore Court
Cheltenham
Gloucestershire
GL51 0JY

Comments: 27th July 2020

I object to this Application.

This is an AONB site and as such is a highly protected green space.

I grew up at The Gray House opposite these fields and loved to see and hear the wildlife there.

I now find that when I visit my parents the traffic is much heavier and faster, but most of all I certainly don't think the land should be built on, adding to the traffic flow on a fairly minor road, harp hill, with congested junctions at either end.

87 Ryeworth Road
Charlton Kings
Cheltenham
Gloucestershire
GL52 6LS

Comments: 24th July 2020

Aonb. Traffic impact using glenfall way and mill lane as short cut to A40, a417 etc. Flood impact. Too many more reasons to list!

12 Brockweir Road
Cheltenham
Gloucestershire
GL52 5FW

Comments: 25th July 2020

Oakley Farm Pastures is a irreplaceable AONB with the great old trees, the wonderful wildlife & sounds of the country in an already very busy area of many people & plenty of speeding traffic.

Putting 250 houses on OFP means well over 500 more cars & people, as many of the houses will be multi occupancy! This causes major problems with everyone living on top of each other with not much space for themselves.

It will make the roads, schools, doctors, drains & services struggle & fail even more than they do already. Flooding in Priors Road is already awful.

This small area wasn't intended for so much of 'everything' its a country town not inner city?!?!

We realise people need homes, we do our children do our grandchildren do but there is land in Cheltenham designated to that & OFP is & never should never be that list.

Kerrymead
Birchley Road
Cheltenham
Gloucestershire
GL52 6NX

Comments: 3rd August 2020

250 homes would mean many vehicle trips up/down Harp Hill. Congestion on Hales Road is already horrendous, particularly at traffic lights with A40 and on the mini roundabout at the bottom of the hill during peak times.

The land is designated as AONB land.

Its not in the recently adopted Cheltenham Local Plan for future housing development.

For these reasons I object.

6 Brook Vale
Charlton Kings
Cheltenham
Gloucestershire
GL52 6JD

Comments: 19th March 2021

I wish to object to this application for the following reasons:

- I use the road on Harp Hill on a daily basis and it is dangerous as it is too narrow already for walkers, dog walkers and horse riders.
- The junction at the Hales Rd end is very congested without the addition of traffic generated by this amount of housing.
- The junction into Greenway Lane is very busy and dangerous even at the moment without the extra traffic that the proposal would create.
- There should be a presumption against allowing large scale development on green fields especially in an AONB.

39 Hales Close
Cheltenham
Gloucestershire
GL52 6TE

Comments: 5th August 2020

We STRONGLY object to this!

This location is a pristine AONB greenfield site therefore no permission for any building development of any type should be issued for this location.

The definition of an AONB is land protected by the Countryside and Rights of Way Act 2000 (CROW Act). It protects the land to conserve and enhance its natural beauty.

Under the CROW Act, you, Cheltenham Borough Council, MUST make sure that all decisions have regard for the purpose of CONSERVING and ENHANCING the natural beauty of the AONB.

1 - AONB.

How does building 250 houses conserve or enhance the AONB? It does not & cannot!
We would challenge CBC to provide one way in which this planning application fits this criteria.

2 - The Cheltenham Local Plan, just published and adopted by CBC Councillors after years of debate, EXCLUDES this specific area from future housing development. It would be hypocritical & corrupt for any planning permission now to be granted.

3 - Traffic.

Unacceptable pressure will be placed on Harp Hill both at the Hewlett Road mini roundabout but also at the Sixways junction in Charlton Kings.

Traffic density will be a disaster with pollution spilling into our overburdened & unsuitable streets.

Harp Hill, Hewlett Road, Bouncers Lane, Prestbury, Sixways, & Priors Road will all become pollution hot spots with traffic queuing and engines running! None of these roads were designed for such overuse - an additional 500+ cars!

Additionally Greenway Lane is narrow & unkerbed. Walkers, cyclists & horse riders already have cars whizzing by - an accident waiting to happen! When there is a cricket match the congestion is even worse.

Access - the proposed access onto Harp Hill is simply stupid! It too is an accident waiting to happen.

4 - Wildlife & Nature.

Rain already floods down the hill & the Hales Road roundabouts regularly flood.

Building on these fields WILL create more flooding problems. Increased noise WILL be a problem.

Air quality WILL be a problem.

There WILL be destruction of irreplaceable wildlife habitats and removal of hedgerows/trees where an abundance of birds/deer/foxes/badgers/owls and bats and other all live & visit because this is an AONB.

Wildlife WILL be hugely affected. The deer population is thriving and we often see deer in the fields and crossing the roads.

5 - Infrastructure.

There WILL be a hugely increased requirement for schools/doctors and local amenities - what we currently have is barely adequate now.

6 - Brown field sites - use these first!

With Covid, many companies will change their working practices & more brownfield sites will become available. Developers should be required to develop these sites - not take our irreplaceable green fields!

This is quite simply a case of money over preservation - profit for developers!

Whilst we accept the need for new housing - why should this be at the expense of our AONB when other alternatives are available!

Cleevesyde
Harp Hill
Charlton Kings Cheltenham
Gloucestershire
GL52 6PR

Comments: 5th August 2020

I wish to lodge an objection against the Oakley Farm planning application (20/01069/OUT).

I would like it understood that We at Cleevesyde and the residents of Half Acre, Harp Hill, have employed the professional assistance of James Hunter (Helix Transport Consultant Ltd) and Diane Jones (planning consultant) who have verbally agreed with Lucy White to be able to submit their documentation after 06 Aug 2020.

My objections are based on the following: AONB, wildlife, traffic, winter isolation and vehicle light pollution as a blight on our properties.

AONB. Area of Outstanding Natural Beauty; my question is: When does an area deemed to be of such importance that it has this 'protective status' placed upon it, suddenly become unimportant or not beautiful? The answer should not be 'for considerable financial gain'! Once it's gone it's gone forever. In their bid to achieve this financial gain, the developer has tried to de-categorise the 'lower section' of the land parcel in question, thus trying to negate lower section for its importance in the AONB, but AONB is and should be treated as a whole. The developer has designated a 'green band' at the upper section as an attempt to 'maintain' that upper area as the sensitive AONB. However they have also designed a road to slice straight through that upper section. A road that will be carrying approximately 1200-1500 vehicle movements a day (see in 'Traffic for this calculation). No wild life will want to reside there once that has taken place. The very important wild life that thrives in these protected areas, and one of the critical reasons for protected status. This will also not actually create or maintain an apportioned area of AONB, as the road and the traffic on it will by their very nature not be beautiful. This proposal of the upper section will just look like an average park and not rural pastures, as it is meant to.

In my mind, these pastures were designated as AONB because they formed part of the 'Green Frame' around Cheltenham this 'green frame' extends from these very pastures, encompasses Cleeve Hill and the Cotswold escarpment and continues right round to Gretton, Alstone and beyond. These pastures are plainly visible from many many key places when travelling or looking south from the north of Cheltenham and beyond as they are on elevated and rising ground that is way above the roof height of the general urbanisation of the town. In fact you can see these pastures from the M5 when crossing the river Avon at Bredon. After all, the area is called Battledown because it's view was considered a Downs many many years ago. Most Downs are protected for good reason.

The pastures are most prominent when at places such as Priors Road, Albert Road, Barley Road, Clover Drive and of course when stood at Cheltenham Racecourse, which is famed for its Outstandingly Beautiful 'Green Hilly Frame'. I have submitted photos from these key places to show the visual importance of this vista. Also to show that when houses are two thirds of the way up you would not see the, so say, AONB that the developer is claiming to maintain.

When GCHQ was built many years ago, it encroached on the AONB, but the planners enforced it to be painted Green to camouflage it within this very special and visually sensitive area. However, sadly, when the brown field redevelopment of the GCHQ site was undertaken the council made the catastrophic mistake of allowing multi coloured houses of multiple floors to be built, this I will never understand. This is a huge scar on the AONB 'green frame' of our wonderful 'rural' town. Please do NOT make this mistake again.

The fact that there is yet to be a property type determined on this development, there is a considerable chance, as mentioned above, that due to the angle of vision towards this area the green band at the top will be totally obscured when houses climb more two thirds of the way up the rising ground, the week attempt to maintain the 'green band' at the top of the site will be blocked out by those very properties due to their height, even if the upper ones were single story.

I would also like to point out that the owner of this land has failed to cut or maintain the hedge heights along Harp Hill over the past year. Since 2008, when we moved to Cleevesyde, the hedges were always cut twice a year and they were kept at approximately 1 metre high parallel to the road. This left the prominent warning sign for Wild Deer way above the hedge line. It is now starting to be over taken and obscured by the hedge with the summer growth! This lack of maintenance is a clear indication that the land owner/developer has the intention to let the hedges grow to obscure the view of this AONB from the people viewing it on Harp Hill, giving them a good advantage in their bid to de-categorise the lands importance.

During lockdown literally thousands of people every day from dawn until dusk would be walking up and down, as there were virtually no cars, and the majority would stop and look across the wonderful vista that these pastures create. Many of these people had never been up here before, but with time and permitted exercise they discovered the gem of a view of this edge of the Cotswold escarpment, that we all know and cherish.

This land does not form part of the latest 10 year 'core strategy' for Cheltenham's continued development. Therefore this land should not be considered now, or at any time in the future. If this land loses its AONB status then that makes a mockery of any AONB protected land and leaves all of those areas at huge risk of inappropriate development.

Traffic:

I have already mentioned that I have employed a traffic consultant who's report is due to be submitted soon. Early indications and discussions with him have already shown that the data and models used by PSA the developers consultants, have not been used in the correct manner, and therefore they cannot substantiate the claim to the effective clearance of traffic, but his report will highlight this.

My thoughts and feeling are as follows:

250 homes, in modern life is without a doubt 500 cars, each going to and from work once a day at a minimum, that's 1000 vehicle movements per day with no over estimation. But modern life also encourages deliveries from Pizza to online shopping so I don't doubt for a minute that there will be 1200-1500 vehicle movement per day. All of which have to exit the area, once on Harp Hill, by one of several routes. Either the bottom of Harp Hill, which is a heavily congested area at this point in time with parked cars from the homes there and from the many visitors to Battledown Children's Centre. I can't imagine they'll be happy if 'No Parking' is enforced! Greenway Lane at Sixways which is extremely

congested and the tightness of the bend before the lights leaves cars backing up to Ashley road and to Ashley Close as it stands, again without any additional traffic from the proposed development, and then there are the two country lanes, which are already winding, narrow and tight at the bends with no pavements, also most treacherous for anyone walking them at this time, without added pressure of more cars.

When the redevelopment of GCHQ took place only 40 properties were considered appropriate to add their traffic onto Aggs Hill, and thus on to Harp Hill. How can it possibly be a case that the statistics and data that were used to calculate those restrictions is not over ruling the application to allow 250 more homes to use the Hill?

As the nature of our human existence continues, vehicle usage is increasing year on year, therefore future projection of vehicle intensity must be thought of and no unnecessary load should be added to Harp Hill, Greenway Lane, Mill Lane and Aggs Hill, they simply cannot take this overload.

The biggest and most concerning thing that impacts both Cleevesyde and Half Acre, in terms of traffic, is the entry/exit road to the site. It has been indicated to be directly opposite our properties. The land drops away from Harp Hill quite steeply and the access road enters the land at 90° to Harp Hill before bearing right 90°, then descending to the proposed area of urbanisation. When vehicles exit the site in the hours of dusk and darkness, from as early as 4pm in the winter, the vehicles headlights will be pitched at such an angle due to the topography of the land, that they will shine brightly and directly at our lounge and bedroom windows. With the above rough calculations on vehicle movements, we will experience this occurrence at least 400-500 times per evening. This will hugely impact on our personal well being at home, and of course the value of our properties. I feel that the developer has not considered the disruption, distress and negative impact on our living standards in our home in their drive to gain profit.

In the years we have lived here on Harp Hill, when the snow arrives in the winter, despite the efforts of the highways gritter lorries, the hill is ALWAYS cut off, as the build up of snow makes Harp Hill a dangerous and lethal approach and exit. It is also not possible to get onto Harp Hill when approaching from Greenway Lane. Aggs Hill is obviously no alternative either. But aside those existing roads, the access road to the development will also be at such an incline that it too will be impassable and the cars of the entire development will be stuck down in the estate until the snow melts. Emergency vehicles will be hugely hindered too, as even though emergency access has been indicated via the original farm access, the properties will all be up hill at a steep gradient from that access point.

In conclusion, this area of land is wholly inappropriate to develop for housing on so many points that I implore you to reject this application and to make this land forever protected.

Comments: 2nd September 2020

Letter from DJPlanning, on behalf of Cleevesyde – see attached.

Comments: 7th August 2020

I, Owner and resident at Cleevesyde Harp Hill, have recently submitted my objection to the planning application of ref number above. In that objection I had indicated that I had/was sending in photos to enhance my objection.

Please see the attached images that show the following: (attached)

- 1) The land is clearly visible above the general urbanisation when looking south towards Cheltenham, from North Cheltenham.
- 2) The land is of such an incline that the exiting vehicles will impact on my property and my direct neighbours. Emergency vehicles would not access during periods of snow, as the hill get cut off.
- 3) That the proposed stop line of development will still be far enough up to obscure the view of the green area they propose to maintain as their offering to save the AONB. It will not be seen properly with the Hugh level of development indicated.
- 4) The land Clearly forms part of a 'green frame' that surrounds the north of Cheltenham.
- 5) This land is clearly visible to so much of Cheltenham that its loss would effectively change the leafy feel this wonderful town so proudly of.

Comments: 22nd September 2020

Letter from Helix Transport Consultants on behalf of Cleevesyde and Half Acre available to view in Documents tab.

14 Chapel Lane
Woodmancote
Cheltenham
GL52 9HT

Comments: 6th August 2020

Correction to Design and Access Statement Reference in previous Objection dated 6/8/20.

This development significantly affects the existing Public Right Of Way ZCH86 and should be an opportunity to improve the safe green corridor connection for walkers, however the Environmental Statement Section 9.5.3 and the Design and Access Statement Section 4.1.4 indicate that cycle access is to be provided to what is currently a footpath.

Whilst the provision of improved cycle access to the new development is welcomed separation and safe use of both the footpaths and cycle routes must be achieved.

Change of use of the Right of Way cannot not be implemented without due process and approval to ensure appropriate arrangements for all users.

Footpath Secretary
Cleeve Ramblers

Comments: 6th August 2020

This development significantly affects the existing Public Right Of Way ZCH86 and should be an opportunity to improve the safe green corridor connection for walkers, however the Environmental Statement Section 9.5.3 and the Design and Access Statement Section 2.5.2 indicate that cycle access is to be provided to what is currently a footpath.

Whilst the provision of improved cycle access to the new development is welcomed separation and safe use of both the footpaths and cycle routes must be achieved.

Change of use of the Right of Way cannot not be implemented without due process and approval to ensure appropriate arrangements for all users.

Footpath Secretary
Cleeve Ramblers

Woodbine Cottage
Aggs Hill
Cheltenham
Gloucestershire
GL54 4ET

Comments: 13th August 2020

We would like to object to the planned building of 250 houses made under this application.

Our main objection is the use of part of the Cotswold AONB for building. Even under the recently relaxed rules for planning, the 3rd tier states that Green Belt & AONB would be protected. Although the surrounding area has been developed recently, this was built on the brownfield site of the old GCHQ. The proposed site is not and has an abundance of wildlife and protected trees.

Our second concern is the extra traffic with the access coming directly onto Harp Hill. You can only assume that with the proposed 250 houses, comes between 250 and 500 cars. This particular road and the infrastructure of the surrounding roads cannot take this extra volume of traffic. Harp Hill is narrow and winding near the access road. It is already busy with normal volumes of traffic but also with a healthy volume of walkers, cyclists and horse-riders too. The top half of Harp Hill to Birdlip Road and Greenway Lane do not have pavements and are already a danger to pedestrians. The road surface is already poorly maintained with the current volume of traffic.

Our third concern is the flooding risk. We can see that some provision has been made on the proposed site but any heavy rain pours down Aggs Hill and Harp Hill with flooding occurring across the roads and at the lower end of this site regularly. If more land is built on then the flooding will only get worse.

If this planning is approved, it will open the floodgates to further development of Green Belts and AONBs.

County House
Bayshill Road
Cheltenham
Gloucestershire
GL50 3BA

Comments: 12th August 2020

Building on AONB and green spaces goes against all national policy.

Access/traffic - Harp Hill cannot accommodate an increase in any more traffic. It already suffers from serious traffic speeding which has become worse since the GCHQ redevelopment, not to mention race traffic. With 250 new homes comes the traffic of at least 500+ cars, plus all the online delivery vans and lorries that go with it.

Local plan - this land is not part of the local plan for development.

Visual impact - Cheltenham has always been a beautiful town. We have to protect what makes it such a nice place to live. The development would further damage the visual impact of the Cotswold escarpment. .

Road safety - Harp Hill is incredibly steep and narrow and cars already speed up and down the road - almost every car triggers the 30mph speeding sign - with no consideration for pedestrians or cyclists. It's unsafe and an absolute disaster waiting to happen. The road isn't sufficient or appropriate for access. If anything, the road needs intervention to reduce traffic - six ways traffic lights have made it a shortcut and rat run.

Local flooding - we are seeing more and more flooding at the bottom of Harp Hill because of over development in the area. Building on this green space will only add to this issue.

92 Priors Road
Cheltenham
Gloucestershire
GL52 5AN

Comments: 16th August 2020

I object the the proposed development on three grounds. Firstly it will detract from the AONB enjoyed by many people that live in and visit the area. Because of the elevated position of the site it will become a prominent part of the landscape visible to the local area. Secondly the traffic on Priors Road and surrounding road network is becoming increasingly busy, especially Harp Hill and smaller roads during the morning peak. Lastly, I have serious concerns about the lack of public amenities with the increasing number of homes being built in this part of Cheltenham, in particular the added pressure on schools. I am concerned that the rate of development in this area with no new local schools will result in our children having to travel longer distances if they cannot obtain a space at a nearby secondary school in years to come. Other local amenities are also lacking such as cafes and restaurants that help create community and is often missing from homogenous new housing estates.

I urge the council to carefully consider this application and the points I have raised.

55 Ryeworth Road
Charlton Kings
Cheltenham
Gloucestershire
GL52 6LS

Comments: 19th March 2021

Object, we already have enough new houses, this is taking away views and from nature. It will increase traffic around an already busy road and increase traffic on greenaway lane

6 Drybrook Walk
Cheltenham
Gloucestershire
GL52 5FR

Comments: 21st November 2020

I object to this development. I have several reasons why I feel this development should not be allowed to go ahead.

Firstly we already have severe issues with school allocations for the children that already live in this community. My children couldn't even get a place at our closest secondary school, Pittville school. So I cannot see how we could accommodate even more children with school places being severely stretched as it is. The local primary schools are also running at capacity, so where would all these extra children go to school.

Harp Hill is already a very dangerous and busy road, especially at key times of the day. It is a small, very tired road and was not designed to take the level of traffic it currently takes, let alone potentially hundreds more vehicles. Priors Road and Hales Road are already very busy roads and I do not believe they could accommodate even more traffic, especially the numbers we are potentially talking about.

The impact on the wildlife would be huge. The fields house multiple varieties of wildlife, from birds, foxes, badgers, deer, owls....

I am concerned at the impact on my property. Particularly the level of noise from a further housing development. Currently I am near quiet open fields, which is why I purchased my property. If this changes, I will instead be near hundreds more people and noise that comes with that. My views would change from being sheep in fields, hedgerows and trees to hundreds more houses. This could also potentially devalue my home.

There is also the issue with water run off, we already have issues with standing water when it rains, in priors Road and at the bottom of Harp Hill. I believe this would be severely exacerbated.

16 Fossebridge Place
Cheltenham
Gloucestershire
GL52 5BW

Comments: 12th December 2020

Absolutely object to this. As it's in an AONB and the amount of wildlife that's already been disturbed. Please don't let this go through

148 Whaddon Road
Cheltenham
Gloucestershire
GL52 5NS

Comments: 24th July 2020

It will be ruining the beautiful area and will destroy the habitats for the wildlife

9 Bicknor Drive
Cheltenham
Gloucestershire
GL52 5GF

Comments: 1st August 2020

Strong objection to this proposed building project. We already have the Whaddon and Lynworth sites which serve the local community, further sites are not needed.

An Area of Outstanding Natural Beauty is meant to be precisely that, and protected. If you build upon this area it will be gone for good. As a resident of the area I object to the proposal for this landscape to be taken from the community who enjoy it for a multitude of purposes. You are slowly and systematically agreeing to all building upon green belt land surrounding Cheltenham, and this amounts to nothing short of 'green crime'.

18 Birdlip Road
Cheltenham
GJ52 5AJ

Comments: 1st August 2020

I came to know that there is a proposal to build more than 250 houses on the Oakley Farm Pasture Slops (Planning ref No 20/01069/OUT). I would like to appeal you all for not allowing this project to be approved as I am a local resident living at 18 Birdlip Road GL525AJ and I have the following concerns with this project.

1. No walk path on Harp Hill : My kids study in the local secondary school and they walk to the nearest bus stop on Hales road via Aggs Hill and Harp Hill. As there are no walk path they find it at times a great risk to walk on these roads. Having this new development will make it still more difficult for pedestrians as there will be more traffic on the narrow Harp Hill road.

2. Traffic Jam on narrow Harp Hill : If this proposal is approved, then there will be traffic jam on narrow harp hill road each morning and afternoon as more cars will be clogging up my work/school/shopping run. This iss unacceptable as I want to enjoy living in my house not getting caught in traffic every day during rush hours.

3. The proposed area is a area of outstanding natural beauty. When I moved to my current address, I use to see so many varieties of wild life. But over the past 2 years its been declining. Having another massive project in this area will completely destroy the natural habitat.

4. The local countryside will be lost for ever.

5. Forced relocation of wildlife.

6. Furhter pressure on valuable local amenities.

I kindly request you all to consider the adverse effect this project will have on the local community and on the natural habitat. Hence I kindly request you NOT TO ALLOW this project to be approved.

185 Hewlett Road
Cheltenham
Gloucestershire
GL52 6UF

Comments: 2nd August 2020

When this land was sold there was a caveat saying that it could not be used as a building development. There has been substantial development on the old GCHQ Oakley site, further development in this area is going to put a heavy strain on local amenities and services. The increase in the volume of traffic and the associated increase in pollution will impact adversely upon all of us who live in the area. The importance of the open space and the wildlife who frequent it should not be ignored. Development of this site is a disgraceful proposal and should not be permitted.

4 Landor Gardens
Cheltenham
Gloucestershire
GL52 2TB

Comments: 2nd January 2021

Object on 2 grounds:

Firstly Harp Hill is already a dangerous rat run. Many walkers use this route up to Cleeve Hill and it is not designed for heavy traffic. There are insufficient pavements and a dangerous corner at the top.

Second most important objection is the loss of biodiversity and an important green space and footpath into green open space vital for wellbeing. These habitats for wildlife cannot simply be replaced by some landscaping, they have taken generations to evolve from the soil structure up to the wildlife that lives there. We need these things. They are important. Housing can be recycled and recreated on brown field sites, impoverished urban areas can be regenerated. This planning application benefits nobody.

161 Hewlett Road
Cheltenham
Gloucestershire
GL52 6UD

Comments: 4th August 2020

I object to this planning proposal because the land is ANOB and provides a natural habitat for wildlife and a green and pleasant sight for local residents, walkers, and cyclists.

A building development this size would impact upon traffic flow on local roads, especially minor roads e.g. Harp Hill, and an increase of noise, pollution, and stress for local

residents, including those living further away from the proposed Oakley Farm site e.g. Hewlett Road.

I would very much like to keep this part of the outskirts of Cheltenham a green and pleasant, undeveloped land.

14 Greenway Lane
Charlton Kings
Cheltenham
Gloucestershire
GL52 6LB

Comments: 4th August 2020

I would like to strongly object to this application.

The site is located in the Cotswolds AONB, in an essentially rural location.

Cheltenham Borough Council's own Landscape Character and Sensitivity Assessment (April 2015) classified this location (Oakley Farm Pasture Slopes) as having the highest possible level of sensitivity/value amongst AONB land on the area, and lowest possible capacity for built development. A Low capacity for development (Major landscape constraint), with High landscape sensitivity, High visual sensitivity and High landscape value.

In practical terms, I question the suitability and sustainability of the local facilities to support yet more development. Greenway Lane and Harp Hill are not capable of safely accommodating such a significant increase in traffic. With the gradients involved, absence of pavements (on Greenway Lane and upper Harp Hill) and lack of immediate public transport this plan would be guaranteed to result in another 400-500 vehicles regularly on these already over-busy roads. Local doctors and schools are already over-stretched. These things need addressing before development anything like this scale could be considered sustainable here.

I recognise the need and obligation for Cheltenham council to increase the supply of housing, but feel strongly that areas already identified in the local plan and in particular true brownfield sites, such as the nearby Bouncers Lane or Tim Fry Landrovers sites are both sufficient and far better suited. I hope you see sufficient ground to reject this application out of hand.

129 New Barn Lane
Cheltenham
Gloucestershire
GL52 3LQ

Comments: 5th August 2020

We are so lucky to live in Cheltenham, where we have access to beautiful, unspoilt countryside. We are also lucky that the system allowed some of this countryside to be earmarked as " areas of outstanding natural beauty" so it could be protected from destruction. How could you even consider building a housing estate on one of these areas? Not only does it make a complete mockery of the whole concept of having

"AONB", it would spoil the wonderful environment that makes Cheltenham such a beautiful and desirable place to live. On a more detailed level, Harp Hill is already totally over loaded with traffic. It's used as a rat run to and from Charlton Kings, and now has to carry all the additional traffic from the houses which have already been built at the top of the hill. This planning application is madness, please let common sense prevail and stop it in its tracks. I also note that the Government's new guidance on planning regulations specifically categorises land allocated as AONB as "protected". This is done for a reason.

17 Beeches Road
Charlton Kings
Cheltenham
Gloucestershire
GL53 8NG

Comments: 5th August 2020

Living Streets Response to 20-01069-OUT - Oakley Farm

The consultants suggest that pedestrian access is via Public Footpath ZCH86

There are 3 legal access points to this path. They are Priors Road, Wessex Drive and Harp Hill. Access at all 3 points is controlled by kissing gates.

There is another kissing gate along the public footpath where the public footpath meets the track to the farm.

This excludes the use of this path by baby buggies. This means that people using such will need to climb up to the highest point of the site to leave the site.

Due to absence of any adequate footway on Harp Hill at this point makes it dangerous for pedestrians.

Thus there is a need to provide a 2m wide footway on both sides of Harp Hill past the development.

This will facilitate pedestrian access to the primary school in Battledown Approach via the private roads of Battledown Estate.

Also the developer ought to fund a 2m wide footway along Greenway Lane primarily to provide a safe route for school children attending Balcarras Academy, Charlton Kings.

ZCH86 on the western side of the site is narrow and suffers from maintenance issues from growth of the vegetation in the boundary of the site.

I. The boundary between the path and the amenity space created by this development ought to be removed to reduce the maintenance requirements.

II. Where the path will run between the existing rear gardens of Wessex Drive and the rear gardens of the proposed development that Rights of Way Review committee for

Footpaths stipulate that ZCH86 ought to be at least 4m wide at this point.

Provision needs to be made to provide pedestrian and cycle connection to the adjacent roads in the GCHQ redevelopment immediately to the north - such as Speedwell Gardens.

This will provide a more direct connection to the Sainsbury's store and the A route bus stop. This being made not imperative due to the Q bus service being suspended and the P bus service curtailed to 2 or 3 times per weekday.

It is noted that the developer intends to provide cycle access along the farm track that is at present part of ZCH86. However as it is illegal to cycle on a public footpath this cannot occur without modifying the path network.

The farm track is at present popular by dog walkers from the Oakley council estate as being designated country they do not need their animal's faeces. It also acts as a drain when there is heavy rain with the vehicle ruts channelling the storm water.

Thus this farm track needs

1. Provision for Drainage
2. Tarmacking
3. Installation of Lighting

Prior to opening it as a cycle route

The security fence that surrounded GCHQ Oakley on the northern boundary of this site is inappropriate to separate 2 housing estates and needs to be removed.

5 The Grove
Hales Road
Cheltenham
Gloucestershire
GL52 6SX

Comments: 9th April 2021

Please do not build these houses. Protect our much needed green space

6 Drybrook Walk
Cheltenham
Gloucestershire
GL52 5FR

Comments: 28th July 2020

In regards to this application, we object this application.

In regards to access from Harp Hill, this road would not be able to cope with the influx of traffic. The new development currently in progress were only allowed a certain amount of properties to access from Harp Hill. Therefore increasing the amount of further traffic using this road will only degrade the road even further. The road condition is poor at present and further traffic will deteriorate this further.

The road is a single carriageway road and thus will not cope.

The double mini roundabout system will not cope with extra traffic.
There is not sufficient footpaths on road side to accept increased foot traffic.
The current footpaths are not maintained correctly and greater foot fall will only exacerbate this.

There is not sufficient road access for any further traffic to be taken off the current oakley estate. The roads are already blocked by park vehicles. The amount of vehicles from this estate is far more than the current allocated spaces provided and increasing this from allowing access from the current estate would cause further issues.

There is not sufficient school Spaces accept new children into estate. Currently the primary schools locally are oversubscribed
Secondary schools the area doesn't not fall within any local secondary schools. It falls to Cleeve school accept new students.

The local infrastructure is unable to cope with a new estate.

On top of this the area is an AONB area and taking this away would impact the ecology locally.

The local drainage system is unable to cope there is flooding to the local roads at bottom of harp hill. Increasing the hard surfaces to this area will increase run off and increase flooding on the roadways.

1 Coberley Road
Cheltenham
Gloucestershire
GL51 6DF

Comments: 28th July 2020

I strongly object to the proposal to build 250 houses on Oakley Farm Pasture Slope. This is an Area of Outstanding Natural Beauty and should be protected as such. I visit friends in this general area regularly and would hate to see it spoilt by such an inappropriate development. The area supports a wide range of wildlife as well as a number of protected trees. It is not part of the Joint Core Plan and would be very detrimental to the town if this proposal was allowed to go ahead.

1 Coberley Road
Cheltenham
Gloucestershire
GL51 6DF

Comments: 28th July 2020

I must object most strongly to the proposal to build 250 houses on Oakley Farm Pasture Slope. This is a protected Area of Outstanding Natural Beauty and should be respected as such. I know this area from regularly visits to friends and would hate to see it spoilt by such an inappropriate development. The area contains a large number of protected trees and also supports a wide range of wildlife. It is not part of the Joint Core Plan and would be very detrimental to the town if this proposal was allowed to go ahead.

14 Kempley Close
Cheltenham
Gloucestershire
GL52 5GB

Comments: 14th December 2020

I would like to object to the proposed development of Oakley farm pasture slopes. I make this objection for a number of reasons:

1. The loss of such beautiful land would have an immeasurably negative impact on the happiness and health of thousands of local residents. Having clear visual access to nature is well known to be essential to mental well-being, and the fact that these fields are so widely visible means the effect would be widespread
2. The irredeemable loss of a vast tract of natural habitat for wild animals and insects that are essential to the health of our ecosystem
3. The roads in the area are already struggling with the level of traffic that exists, adding another 250+ vehicles to this volume is dangerous
4. Further environmental impact from the loss of land that can act as flood defences

As I'm sure others have submitted, these areas cannot be recovered once developed. Please act to prioritise the wellbeing of existing residents and wildlife.

8 Pillowell Close
Cheltenham
Gloucestershire
GL52 5GJ

Comments: 14th December 2020

I have objection to the planning proposal for 250 homes on the following aspects;

From a selfish perspective I purchased my property at Pilowell Close partly due to the nice views I have of that field. Every we enjoy sitting on the window sill and watching the sheep in the field. The incline of the field means that many people get to enjoy its view.

From a wildlife perspective it is a field rich with animal life. I regularly hear and see the owls, deer, foxes and moles that frequent it. It would be sad to see all that go.

From a common sense perspective there are more suitable plots of land that should be utilised before we start raiding AONB land. For instance Staverton airport is a costly and relatively poorly used vast plot of land that could house thousands of new homes with minimal impact to the surroundings or wildlife. It is flat and far easier to develop, and has convenient access to local infrastructure and services. Yet here we are raiding beautiful hillside plots that should be left well alone.

This zone at Oakley has had over a decade of development and it is now time to give it a breather and look at other more suitable areas for housing. Thank you.

Glenthorpe
Battledown Approach
Cheltenham
Gloucestershire
GL52 6QZ

Comments: 31st July 2020

I object to this application.

Harp Hill can not cope with the amount of traffic that use it daily now and with an additional road entrance on the Hill itself with traffic turning left and right there will be accidents especially with cyclists coming up the Hill slowly and down fast.

There is a plan for future housing for Cheltenham and this area is not in the plan so I do not see why it is even being discussed.

The countryside is being eroded as it is, so this area of AONB should be left as an Area Of Natural Beauty.

Darien
Stanley Road
Cheltenham
Gloucestershire
GL52 6PD

Comments: 5th August 2020

Setting aside all the other objections, surely common sense regarding the access onto Harp Hill will prevail. Harp hill is too narrow and steep and barely anyone takes notice of the speed limit of 30mph and they travel at 60mph or more! There is on road parking and a special school and many times I have witnessed very near accidents, including wing mirrors being ripped off. I really consider the road quite dangerous now without adding more traffic, recently a large house was built on the corner of Harp Hill And Stanley Road and the congestion that caused during building was horrendous and dangerous as it was on a bend into Stanley Road. I strongly urge members of the Planning Committee to spend some time on Harp Hill to witness the amount of traffic using this road before coming to a conclusion. At the very least try driving up the hill and down the hill at the busiest times of the day, it can be quite frightening!

3 Highnam Place
Cheltenham
Gloucestershire
GL52 5FX

Comments: 6th August 2020

There is already a great deal of content which deals with issues of congestion, flooding, pollution, over-development etc and I am sure that the LPA are well-used to reading through such objections.

However, my comments are more related to the concept of rule-making & the reasonable expectation that such rules should be adhered to.

In 2019 I attempted to obtain approval in East Devon to build a dwelling in a section of a substantial garden. Apart from some minor technical issues regarding appearance & height of the proposed dwelling there was nothing that would form grounds for refusal. However, the land in question was outside the built-up area boundary (BUAB) and hence not considered suitable for development. The LPA identified it had sufficient development land supply for the area's five-year requirement for new homes. Because of these factors, the decision was to refuse.

By contrast to the above scenario, Robert Hitchins is applying to Cheltenham Borough Council to create an access road for a proposed development of 250 homes to be built on land at Oakley Farm, Cheltenham. Apart from the obvious difference in the size of the land and the number of proposed dwellings, the principal is the same. The land is not included in the BUAB, it is outside the Local Plan, and is designated AONB, hence also not considered suitable for development. As in East Devon, sufficient development land supply for the area's five-year requirement for new homes has been identified. Therefore, because of these factors, the decision of the Cheltenham LPA should be to refuse.

There is no logical or good reason why the rule-makers of the country would deem it acceptable that a rule should be adhered to in one area, but allowed to be broken in another. We are governed by the same democracy, and collectively as a nation we are expected to obey the rules set out by that democracy, both as individual citizens and as corporate entities. I may not be happy about it, but I as an individual am expected to abide by the rules, and therefore so should Robert Hitchins. What they are proposing is in fact a more serious breach, insofar that if successful, they would create a precedent which would send a message to other large developers that it's acceptable to destroy other AONB sites elsewhere in the UK, and the rules that have been long-established to protect such areas can basically be disregarded.

If the principal of housing development is refused on the grounds stated here (and it should), there is absolutely no good reason why the application for an access road should be permitted.

I therefore would respectfully request that this application is refused.

Southern Lawn
Ashley Road
Cheltenham
Gloucestershire
GL52 6NU

Comments: 9th August 2020

I strongly object to this scheme for approx 250 houses. As these houses will be at the upmarket end of the scale it is likely that each house will have at least two cars, so upwards of 500 vehicles will be using the one access road onto Harp Hill. The very steep Harp Hill roadway has already become a rat run of choice as a short cut to the Sixways, London Road traffic lights, as it avoids lengthy holdups at the Hales Road / London Rd traffic lights or having to short cut through the Battledown trading estate / Beaufort Rd congested system. As I cycle this route quite often, it is already very busy with a

surprising number of heavy fully laden vehicles, vans and lorries using it. so all in all just one access road for vehicles onto the Harp Hill road is not sensible, as it will lead to major congestion and accidents. It will also overload the roundabout system at the bottom of the Harp Hill roadway.

107 Fairford Road
Cheltenham
Gloucestershire
GL52 5FN

Comments: 5th January 2021

I can't believe that the council is even considering allowing building within the AONB. There are other areas of the town and surrounding areas that would be better suited for development. The infrastructure around Harp Hill and the B4075 will not be able to support the extra traffic. The road at the top of Harp Hill does not even have a pedestrian footpath which is bad enough considering the amount of traffic that uses this road to access Cleeve Hill.

215B Hewlett Road
Cheltenham
Gloucestershire
GL52 6UF

Comments: 12th August 2020

I strongly object to all plans on many counts.

I live in at bottom of Harp hill in Hewlett road and I am concerned about increased level of traffic.

I am concerned about effect on wildlife in area such as bats, badgers, deer and birds including barn owls often seen in this area and live in the area and hedge rows.

I am concerned about increased risk of flooding.

Building anymore on our lovely hill will have long term effects on wildlife and our lives and our children's lives

1 Goodrich Road
Cheltenham
Gloucestershire
GL52 5FT

Comments: 21st February 2021

I have lived near the Sainsburys at Oakley for over 4 years and regularly walk up Harp Hill to reach the common. Beyond a certain point, Harp Hill has no dedicated pavement and there are often walkers, cyclists and cars sharing the same space. The road itself is narrow and in a poor state of repair. The additional traffic of 250 new homes would be hugely disruptive to the area and would cause problems at the mini roundabout at the bottom of Harp Hill. It would also further degrade the road surface, and make the road

more dangerous for walkers and cyclists. For these reasons, I strongly object to the development.

51 Naunton Park Road
Cheltenham
Gloucestershire
GL53 7DG

Comments: 8th February 2021

I hope I am correct in thinking that there can be no possibility of granting planning permission for building on the Oakley Farm Pasture Slopes. Surely one essential feature of ANOBs should be that they are sacrosanct.

Glendouran
Greenway Lane
Charlton Kings Cheltenham
Gloucestershire
GL52 6LB

Comments: 6th August 2020

We wish to object to the proposed building of 250 homes in an area of outstanding natural beauty.

The proposal puts excessive demands on the already struggling infrastructure. History of other commercial projects teaches us that much is promised but little delivered. The local road network is already in a poor state and even if brought up to standard has insufficient room to provide the safe passage of cars, pedestrians and cyclists. The traffic travelling down Harp Hill would cause congestion on to Hales Road, the routes along Greenway Lane would worsen the established congestion at times of school drop off/collection times. As a local resident I witness this, the frustration leads motorists to speed through the Sixways traffic lights or run red lights. This data is not collected in developer studies.

Has adequate provision been made for healthcare and schooling provision? Working in general practice I know a lot of GP practices are struggling to provide services which is going to get tougher with ageing population.

Finally I don't understand why an area is given an outstanding natural beauty status if it can be overturned and built upon where other less significant areas are available.

12 Glebe Road
Prestbury
Cheltenham
Gloucestershire
GL52 3DG

Comments: 25th July 2020

When I see such developments, I despair. Is further degradation of our green spaces really what we need? The area already feels massively over-developed, with the gradual creep of estates further and further up the hill. So many people make use of the superb

network of footpaths to walk or run and it is depressing when at the top of the hill to look down and see all the green space that has already been lost. Being in lockdown for three months really brought home the importance of green spaces (especially given the link between air pollution and severity of COVID-19). Traffic in this area is already shocking during peak hours and Harp Hill a major pinch point from both the main road and back road. With 250 houses, there will be a minimum of 250 extra vehicles. The roads cannot support such an increase and quality of life for those already living here will be hugely reduced. Services in the area already struggle with numbers, with schools and doctor's surgeries oversubscribed. Then there is the problem of flooding; with a massive increase in surface run-off created by roofs of 250 homes and the associated tarmac of the roads, where will the extra water go? Drains already fail to deal with surface run-off during the frequent heavy rains we have here, with roads often several inches deep with water. This proposed development will only make it worse. I strongly object to this proposed development.

22 Wessex Drive
Cheltenham
Gloucestershire
GL52 5AU

Comments: 29th July 2020

Will be blot on landscape ruin natural wildlife and cause extra traffic which local roads do not have facilities to handle.

Hilcot
Stanley Road
Cheltenham
Gloucestershire
GL52 6PF

Comments: 31st July 2020

I object to the proposal to build 250 houses on Oakley Meadow. The meadow is in an area of outstanding natural beauty with the exceptional Cotswold scarp slope geographical feature clearly visible and any development would destroy this really important geographical and tourist feature. The CE report unbelievably refers to the development as "enhancing the AONB".

Vital wildlife habitat would be destroyed causing destruction of biodiversity in the area. The CE report developer response is astounding referring to foxes and deer as "not deemed notable species". Badgers, foxes, owls, mice, voles, birds, insects and the wide range of wild grasses and flowers would all be destroyed.

The area is already congested causing high levels of pollution from high levels of traffic. People with health conditions especially would be in danger from stationary traffic caused by approaching 1000 new cars plus delivery vehicles belching out toxic fumes. There would also be more dangerous roads with Harp Hill, already narrow at the base, middle and corner of Greenway Lane. The proposed exit into upper Harp Hill would be a very dangerous junction. These are all commented on as vague "mitigation measures" will be taken to address these in the CE Report

Environmentally the increased level of tarmac and bricks would prevent run off of rainwater creating flooding. Also the mix of sewage and water supply at the adjacent Hewlett's reservoir does not seem sensible and may create a public health problem. In conclusion, I urge you to reject the proposal due to the compelling argument to object in terms of geographical, wildlife, pollution, traffic, drainage that would have a catastrophic effect on our environment for residents and further destroy our Cotswolds AONB for residents and visitors.

41 Imjin Road
Cheltenham
Gloucestershire
GL52 5JU

Comments: 1st August 2020
Objection

17 Alvington Drive
Cheltenham
Gloucestershire
GL52 5FS

Comments: 4th August 2020

The proposed site is the only remaining green area in what has become a concrete jungle. I moved into Battledown Park in 2012 prior to the demolition of the old GCHQ building and that site has now become a huge housing estate. Views of the sounding countryside were lost once that site was completed and there has already been a significant rise in the amount of passing traffic in Battledown Park to access that site which causes daily congestion issues and noise for the residence here.

I am, therefore, outraged to find out that there plans to apply for another huge housing development on an AONB site which is the only remaining site in the area with green land/trees (Oakley Farm). This will only lead to further congestion, decrease the value of existing homes as we lose more green areas that existed when we purchased our homes as well as assisting in creating a rat run of over crowded developments.

In addition to the area losing its appeal due to over crowding and my home decreasing in value, I personally will be affected directly by these plans as the views of trees and fields from the rear of my property (17 Alvington Drive) will be lost and replaced with more concrete.

I can see that there are proposed green spaces to remain on the Harp Hill side of the proposed site but no green spaces are planned for the Battledown Park side....Why? Are the residence on Harp Hill superior to those in Battledown Park, I consider this to be very unjust and urge for this to be reconsidered taking into account all of the residence around the site.

I very much hope that plans to develop this site are stopped, or at least, seriously reconsidered and that the views of everyday people trying to be proud of their homes are listened to over the opportunity for large development companies to make more money for themselves.

16 Greenway Lane
Charlton Kings
Cheltenham
Gloucestershire
GL52 6LB

Comments: 4th August 2020

This is an area of AONB - if this development goes ahead then it will be a disaster to both the environment and wildlife.

Having lived on Greenway LANE for over 40 years we have found that the LANE has become busier and faster due to it being a rat run for many commuters.

Firstly the roads - the roads around the proposed site were not designed for much heavier traffic, probably each property will have 2 cars , that makes at least 500 extra cars on the roads around the site. Being selfish this will have a great impact on Greenway LANE (or at the corner leading down Harp Hill) which has no pavement most of its length. Walkers, cyclists ,horse riders etc now have cars whizzing by, especially on the corner by the reservoir, which is an accident ready to happen. When there is cricket, with the parked cars on the LANE, congestion is even worse.

Wildlife will greatly be affected. The deer population is thriving and daily I witness deer in the fields and crossing the roads. Of course there are other animals who have homes on the site and these will be pushed out and probably die. We should be caring for the environment not causing more destruction. I am sure there are plenty of brown sites where houses can be built and will not affect the the natural environment. Cynically its all about money and no consideration to the environment.

So I bitterly object to the building of new homes on the ANOB, Oakley Farm. Oakley Farm fields should be made into a nature reserve for all to enjoy.

57 Bafford Lane
Cheltenham
Gloucestershire
GL53 8DN

Comments: 11th August 2020

My wife and I strongly object to this development for the following reasons: it will destroy an area of local nature and beauty, visible from miles around, and used by us and by many others for walking, keeping fit, and lifting the spirits because of the natural beauty. The development will additionally place even greater strain on local roads and services.

Craigmount
Harp Hill
Charlton Kings Cheltenham
Gloucestershire
GL52 6PU

Comments: 11th August 2020

I strongly object to the planning proposal 20/01069/OUT for the following reasons:

1. The Local Plan for Cheltenham that was adopted in July 2020 does not allocate this site for development. In addition, the planning proposal is simply not part of the Joint Core Strategy and National Planning Policy Framework which acts as guidance for all to follow.

2. The proposed site has the status of AONB, which is in place to protect the land to conserve and enhance its natural beauty. If AONB is not protected from development then what hope do we have. The developer simply points towards the need for more land to develop and meet government targets which is a weak argument for destroying something that is irreplaceable.

Recent government additional focus to speeding up planning decisions has been announced whereby under new process, land will be designated in one of three zoning categories: 'for growth, for renewal or for protection'. Areas of Outstanding Natural Beauty (AONB) and the green belt will come under the protection category where new buildings will be automatically banned. Further focus and evidence for protecting our national AONB.

3. The proposed access road for the development is via Harp Hill, which will generate many hundreds of extra vehicle journeys (residents and delivery journeys) each day. As a resident of Harp Hill we have witnessed traffic levels, excess speed of traffic and vehicle types (HGV's and LGV's) worsening each year. Air pollution, noise/vibration pollution and a road that has had almost zero maintenance is literally falling apart. Large pot holes, broken surface, crumbling verges and pathways, blocked drains and no council/highways intervention to help with speeding motorists has already made Harp Hill a dangerous place for residents, pedestrians and cyclists before adding more volume. During lockdown earlier this year it was a joy to see how many people could safely use the road to access a beautiful part of Cheltenham by foot or by bike. As life returns back to normal so does the fear that something serious will occur before improvements needs are heard. Speed and volume control are vital as well as safer access for those using it for recreational access.

4. If this was ever in consideration for development why has no consideration been given for access via the newly developed Oakley (GCHQ) Development which borders the lower slopes that the developer has proposed. Instead all traffic routed up and then down steep escarpments of Harp Hill and Oakley Pastures which make access far more dangerous and air polluting as vehicles struggle up, over and down. The only logical access to these fields is as per the original farm access which is via Priors Road but over development has already rendered this route inadequate.

5. The developer makes a very small reference to the planning authorities decision to grant no more than 42 houses permission to access the Oakley (GCHQ) development via Harp Hill back in 2012. The concerns were clear and agreed, traffic has only increased for the past 8 years. The addition of a further 250 homes via Harp Hill is completely disproportionate and unsustainable via Harp Hill and access has already been declined to the previous GCHQ development.

By HAND

Hallam Oaks
Greenway Lane
Charlton Kings
Cheltenham
GL52 6PN

Mrs Lucy White
Case Officer
Cheltenham Borough Council
PO Box 12
Municipal Offices
Promenade
Cheltenham
GL50 1PP



3rd August 2020

Dear Mrs White,

Re: Outline Application for 250 Residential Dwellings, Oakley Farm,
Priors Road, Cheltenham. Ref No. 20/01069/OUT

At the time of writing, I note that 105 objections have been lodged against the above named application (plus 1 neutral and 1 support). In order to save utter repetition, I support all of those objections.

I feel that if this application was not of such a serious matter it would be almost laughable. Unfortunately, that is not possible as, over the last 2 – 3 years, I have observed a steady stream of planning applications in respect of this precious AONB, ranging from the above application back to Cromwell Court, Oakfield House Stables, Kyle Lodge, all in Greenway Lane. Also, 3 of the Sovereign luxury houses, out of 5, have been built on the Harp Hill road.

1. Cromwell Court (18/02581/FUL) was eventually granted planning for 8 self & custom build dwellings in March 2019. This came at a cost of the wooded area that gave shelter to much wildlife and questionable, in my view, being termed a brownfield site. It is rumoured at present that the 8 dwellings could increase to 12/15 and the area now lies in a neglected state.
2. Oakfield House Stables (20/00154/FUL) has had two applications refused and has now gone to Appeal (20/00014/PP1). This ONE modern dwelling would destroy the whole character of the area, if permitted.
3. Kyle Lodge (19/02449/FUL) applied for a large, single 5 bedroom self & custom build dwelling (for family reasons) in the garden, plus garage. This, too was refused in March 2020.

In my view, these 3 applications have architectural designs that are at a complete variance with the beauty of this countryside. All details can be found in full on the planning website.

4. There is also a recent application for Certificate of Lawful Use - Proposed Use for a large storage barn on one of the fields opposite Cromwell Court, Plot 2 (20/01163/CLPUD).

I cite these 4 cases as, since all of this precious area was designated in 1966 an AREA of OUTSTANDING NATURAL BEAUTY, no new property has been built (with the exception of Cromwell Court that replaced a wooden bungalow) on these green fields. This now takes me back to Oakley Farm.

Last week I walked round the Oakley Grange estate, in a late afternoon's sunshine.

I assessed, with horror, the damage that had already been done to this once beautiful escarpment. No longer could one see the lower slopes of Cleeve Hill, over to the Malvern Hills and, on a clear day, Hay Bluff and the Welsh Mountains – once an incredible view. I walked some way up Aggs Hill and eventually, over the ugly, assorted roof tops of the estate, I saw something of the view that I used to know so well. I should also mention that this is summertime with leaves on the few remaining trees. In the long six months of winter no such protection is afforded to the concrete jungle.

Not ONE more dwelling should be allowed to be built on this AREA OF OUTSTANDING NATURAL BEAUTY. Enough damage has been done.

Ironically, as I stood in Birdlip Road again, in the early evening and the fading sunlight, from the nearby farm a cock crowed - THREE times. Yes, I thought, my wise feathered friend is telling me about the greed of man as he betrays the beauty of Nature.

I walked on round to the Pasture Slopes on Harp Hill and, again, looked at the discordant roof tops below me. Once, one saw the Cemetery, GCHQ, all lying quietly in the green fields.

Not ONE more dwelling should be allowed to be built on this AREA OF OUTSTANDING NATURAL BEAUTY. Enough damage has been done.

THE TRAFFIC. It is proposed that the exit for all the traffic in this Application is onto the Harp Hill road, virtually opposite 'Half Acre House'. Why? It is lunacy gone mad – if that is possible and it seems to be it is.

It is proposed that in the region of 250 – 500 vehicles will traverse the Harp Hill road after revving their engines like mad, changing gears, polluting the atmosphere, at the top of the incline. They will either turn right, down Harp Hill, to the already over-congested double roundabout at Priors Road OR turn left to travel to the A40 via Greenway Lane (if totally desperate, via the very bendy Mill Lane) to encompass the Sixways traffic lights that usually take 2 minutes, every change, before gaining access to the A40. Believe me, you can wait there a very long time, as St Edward's school parents must know.

BUT, in Greenway Lane there are also 2 chicanes that currently cause tailbacks, screeching of brakes and much angry language. 250 – 500 more vehicles..... ? Also, on days when the Charlton Kings Cricket Club holds its matches, Greenway Lane has cars parked on both sides of the Lane from the dangerous bend by The Chase up to Kyle Lodge. On such days only single line traffic is possible – 250 – 500 more vehicles trying to battle through?

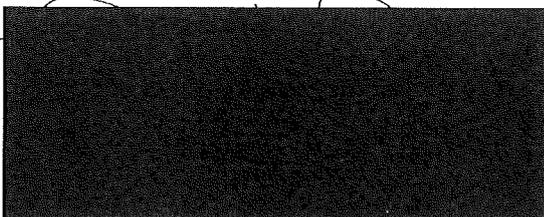
THE SHORTFALL. I feel that the shortfall in the 5 year land supply is being somewhat over exaggerated. I understand that there is a potential for 4,100 dwellings around Swindon Village; 3,700 at the Cyber Park site; a further 320 dwellings at Leckhampton. This, alone, brings a tally of 8,120 with many other smaller applications in the pipeline. Also, if developers released land that they are holding, the target of 10,000 - 11,000 would easily be met. As already stated by others, Oakley Farm and the Pasture Slopes is not part of the Cheltenham Plan and is outside of the PUA.

Therefore, there is no excuse to desecrate this part, or indeed any part, of our COTSWOLD AREA OF OUTSTANDING NATURAL BEAUTY. Not one of the Applications presented would in any way CONSERVE or ENHANCE this jewel in the crown in which we are gifted to live. Just 1 more dwelling permitted would inevitably open the flood gates to more and annihilate this sacrosanct and lawfully protected land.

True, Cheltenham needs Affordable Housing, but let our Planning Officers and many of our very hard working Councillors give their valued time to practical development projects, in legitimate areas, that would provide the very minimum damage to the existing surrounds.

I repeat: I object to this Application.

Yours sincerely,



FAO: Mrs. Lucy White,
Planning Department,
Municipal Offices,
Promenade,
Cheltenham,
Gloucestershire,
GL50 9SA



2nd August 2020

Dear Mrs. White,

Re: Planning Application 20/01069/OUT

For: Outline application for development comprising of up to 250 residential dwellings including provision of associated infrastructure, ancillary facilities, open space and landscaping, demolition of existing buildings and formation of new vehicular access from Harp Hill. All matters reserved except for means of access to site from Harp Hill.

At: Oakley Farm, Priors Road, Cheltenham, Gloucestershire, GL52 5AQ

The following letter has been drafted by my husband and myself in strong objection to the above planning application.

Though I know that opinion and emotion are circumstantial evidence and not taken into account, I feel as a mother I have to voice the following before laying out the factual reasons why this planning application should be denied.

[REDACTED]

[REDACTED] my intent was to walk her to and from school (weather permitting). I can tell you that no more than 3 times did I attempt this with a stroller/push chair that I realized how dangerous this is. Most of Harp Hill does not have pavement or what I, as an American, call a sidewalk. You are forced as a pedestrian to share the road with cars and I can tell you – without hesitation – that many people do not adhere to the 30mph zone AND if they do or not, drivers using Harp Hill and Greenway Lane as a cut through show signs of road rage and frustration. While trying to walk with her on the road, I have been honked at, have had cars pull down their window and yell at me while driving by and the final straw came when a car was frustrated I was using the road (as far to the side as I could) and purposely drove right next to me with a revved engine to scare me. That particular instance I had my child in the push chair and it was the last time I used our road. Which is a very sad thing to say.

I cannot begin to imagine what adding 250 homes to an already congested and non-pedestrian friendly street will do. I do ask you, please, to turn down this application. The legitimate reasoning that goes against actual planning production are in the next few pages but as a mother, I am pleading that the planning department recognize the areas of Cheltenham that are unsafe for its citizens and at least, try not to make them worse.

There are numerous material objection points which are considered a reserved matter – for example, the AONB designation; design; site layout. The main focus of this objection is on that which is not reserved - the proposed access / egress within and around the proposed development site from Harp Hill. It is therefore requested that the Authority fully consider the implications of the proposed access / egress from Harp Hill and refuse this application accordingly.

National Planning Policy

NPPF

The NPPF (National Planning Policy Framework) is the guiding policy that all applications should have as the principle policy guiding development. The following from the NPPF is therefore pertinent in this case:

Section 9: Promoting sustainable transport

P.102. Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

The access proposed has not sufficiently considered the patterns of movement in and around the site. There is very significant potential for dangerous conflicts of movement between pedestrians, cyclists and motorists and the proposed design of access will result in a poor quality place due to inadequate infrastructure.

P.108. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;

b) safe and suitable access to the site can be achieved for all users; and

c) any significant impact from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

Safe access cannot be sufficiently attained at this site and it is certainly arguable that the proposed development would result in a severe and significant impact upon the local road network as a consequence of the high frequency and volume use of Harp Hill as a major access / egress point for the development.

P.110. Within this context, application for development should:

c) Create places that are safe, secure and attractive – which minimise scope for conflicts between pedestrians, cyclists and vehicles.

The proposed access and exit points, as well as the internal layout of the site, will increase potential conflicts of movements between motorists, cyclists, and pedestrians to an unacceptable level.

Section 12: Achieving well-designed places

P.124. The creation of high quality buildings and places is fundamental to what the planning and development process should achieve.

P.127. Planning policies and decisions should ensure that developments:

a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting.

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.

P.130. Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary documents.

The proposed access and development will contradict the above National planning policy.

The National Design Guide

The National Design Guide was published in October 2019 and includes guiding policy concerning design for development. The following is relevant and relates to movement and accessibility in and around the site;

Context

C1: Understand and relate well to the site, its local and wider context

40. Well-designed new development responds positively to the features of the site itself and the surrounding context beyond the site boundary. It enhances positive qualities and improves negative ones. Some features are physical, including:

- *The existing built development, including layout form, scale, appearance, details, and materials;*
- *Access, movement and accessibility;*
- *Views inwards and outwards*

41. Well-designed development proposals are shaped by an understanding of the context that identifies opportunities for design as well as constraints upon it. This is proportionate to the nature, size and sensitivity of the site and proposal.

42. Well-designed new development is integrated into its wider surroundings, physically, socially and visually. It is carefully sited and designed, and is demonstrably based on an understanding of the existing situation.

This further casts doubt as to the suitability of the proposed access and the subsequent potential for poor quality development / design.

Local Planning Policy

The Joint Core Strategy

The JCS was adopted by the three local authorities of Gloucester City Council, Cheltenham Borough Council, and Tewkesbury Borough Council. As such the following policy applies and is relevant to this planning application.

Policy SD4: Design Requirements

i. Context, Character and Sense of Place;

New development should respond positively to, and respect the character of, the site and its surroundings...and addressing the urban structure and grain of the locality in terms of street pattern, layout, mass and form.

ii. Legibility and Identity

New development should create clear and logical layouts that create and contribute to a strong and distinctive identity and which are easy to understand and navigate.

v. *Safety and security*

New development should be designed to contribute to safe communities including reducing the risk of fire, conflicts between traffic and cyclists or pedestrians, and the likelihood and fear of crime.

vii. *Movement and connectivity;*

New development should be designed to integrate, where appropriate, with existing development, and prioritise movement by sustainable transport modes, both through the application of legible connections to the wider movement network...it should:

- Be well integrated with the movement network within and beyond the development itself
- Provide safe and legible connections to the existing walking, cycling and public transport networks
- *Ensure accessibility to local services for pedestrians and cyclists and those using public transport*
- *Ensure links to green infrastructure*
- *Incorporate, where feasible, facilities for charging plug-in and other ultra-low emission vehicles*
- *Be fully consistent with guidance, including that relating to parking provision, set out in the Manual for Gloucestershire Streets and other relevant guidance documents in force at the time.*

Policy INF1: Transport Network

1. Developers should provide safe and accessible connections to the transport network to enable travel choice for residents and commuters. All proposals should ensure that:

i. Safe and efficient access to the highway network is provided for all transport modes;

ii. Connections are provided, where appropriate, to existing walking, cycling and passenger transport networks and should be designed to encourage maximum potential use;

iii. All opportunities are identified and taken, where appropriate, to extend and / or modify existing walking, cycling and public transport networks and links, to ensure that credible travel choices are provided by sustainable modes.

5.2.7 The desired outcome from all development remains a safe and efficient transport network where people feel safe and they have a reasonable variety of travel choices.

The proposed access from Harp Hill is woefully inadequate for the scale of the development proposed. Considering that most families likely have at least one motor vehicle – often two (not including any visitors and their vehicles) – Harp Hill will be unable to sustain the increased traffic levels. Thus safety, site legibility and patterns of movement for all users in and around the site will be dangerous and the above local planning policy will not be complied with.

It should also be noted, as mentioned within the applicant's transport statement, that the site is *not* allocated within the Strategic Allocations Policy. This further questions suitability of this site and proposed access for a development of this scale.

Gloucestershire's Local Transport Plan (2015-2031)

The following from the Gloucestershire Local Transport Plan is contradicted by the proposed access and development here.

Policy Document 2 Cycling

LTP PD 2.1 To ensure that developers assess the needs of all pedestrians and cyclists within their development design and any improvements associated with the development.

The access proposed from Harp Hill will be detrimental / dangerous to pedestrians, particularly given the lack of pedestrianised pavement. Cycling will also be difficult due to the increased traffic levels.

Policy Document 4 Highways

LTP PD 4.6. To consider the needs of all road users including walking and cycling when amending highway speeds to ensure safety, functionality and consistency are not compromised. To work with developers and transport scheme promoters to consider, when designing new schemes, factors which influence the success of routes and facilities in terms of their use and function, such as layout, visibility, gradient, lighting, natural surveillance, integration and signing.

Given the potential for dangerous conflicts of movement between motorists, cyclists and pedestrians, the needs of all road users will not be met using the proposed access / egress from Harp Hill.

LTP PD 4.8. GCC will work with all transport providers to provide a safe, reliable and efficient highway network that encourages pedestrian movements and provides vital walking connections between communities, employment and services.

Similarly, this policy will not be met / complied with.

Relevant Local Planning Applications & Appeals

The following planning applications are believed to be relevant to this application;

- **Planning Application 18/02171/OUT** – *Outline application for residential development of up to 69 dwellings including access, layout and scale, with all other matters reserved for future consideration (revised scheme following refusal of application ref. 17/00710/OUT) | Land Adjacent To Oakhurst Rise Cheltenham Gloucestershire and subsequent Appeal APP/B1605/W/19/3227293 – Refused and Dismissed*

This application, dismissed on appeal, was for similar developments and dismissed for numerous reasons including issues concerning access and landscape and visual impact.

Planning Application CB11954/43 (The Eden Villas Development) outlined that the road network was not capable of accommodating the traffic associated with more than this number (i.e. 40) of houses. As such, a proposal of the scale suggested here – 250 dwellings – will not have sufficient infrastructure and capability for safe and effective access / egress from Harp Hill.

Material Planning Considerations

Access: Safety Considerations for all users

Regardless of what has been stipulated within the documents submitted, there is local residents have existing knowledge / understand that Harp Hill is already a problematic road due to high levels of commuting / school traffic. The additional requirements placed on the road by an additional 250 dwellings will exacerbate these existing problems to an unacceptable and dangerous level.

Emergency access for ambulances / fire engine vehicles has not been sufficiently considered by the applicant.

Harp Hill

The proposed use of Harp Hill is wholly unsuitable for the proposed large scale housing development. The road is already at capacity and residents already experience problems of congestion and conflicts of movement between motorists and cyclists / pedestrians. Documentation submitted by the applicant has indicated that Harp Hill is a

significant site constraint and as such should not be considered as a suitable access / egress road for the scale of development proposed.

Other Considerations

Invalid Site Location Plan

The Site Location Plan submitted has included land that is not within the applicant's ownership – this being the area which includes a small section of the highway (named Priors Road (the B4075)). A valid site location plan therefore ought to be submitted by the applicant prior to any further consideration of this application. The Design and Access statement also utilises this invalid site location plan.

Documents submitted

Planning Statement

The following from the Planning Statement needs addressing.

"It cannot come forward as an allocated site as by its scale it is not a strategic site and the JCS only makes provision for strategic sites"

The suitability of the site is therefore questionable given that it has not been allocated as a strategic site. The JCS should still be considered concerning design and transport requirements for new development and should not be dismissed so lightly.

"7.27. 'The layout of the site responds to the topography and will improve accessibility to the countryside whilst relieving pressure on other areas in the AONB'"

Improving accessibility to the countryside should also include consideration of increased traffic and potential for conflicts of movement between different road users accessing the AONB.

Design and Access Statement

Similarly, the following from the Design and Access statement needs addressing.

"It is concluded that with the implementation of the mitigation and enhancement measures outlined, including the Interim Residential Travel Plan aimed at encouraging travel by sustainable modes, the additional travel by sustainable modes, the additional traffic demand would be safely and satisfactorily accommodated on the local transport network".

This is simply not the case – the Transport Statement admits that there is no provision on the majority of Harp Hill for pedestrian footpaths. As such this again strongly suggests that Harp Hill cannot accommodate sustainable transport / additional vehicles safely on the local transport network.

Environmental Non-Technical Summary

This summary mentions that access from Harp Hill is a significant site constraint. Again, this supports the argument that access from Harp Hill is not suitable for the proposed development.

AONB Designation

Whilst this is an Outline application with all matters reserved aside from access, it should be emphasised that the site is located within the Cotswolds AONB and as such the proposed development will have an irreversible adverse impact upon this AONB.

Summary

I trust that the above has demonstrated to the Local Authority that the proposed access for a development of this scale is woefully inadequate, would result in significant harmful impact to existing and future users and is poorly designed. It is therefore respectfully requested that this application be refused by the Authority.

Sincerely,

[REDACTED]

The Oaks, Harp Hill

Cheltenham

GL526PR

[REDACTED]

Page 381
On behalf of Creevesyde & Half Acre, Harp Hill.

Helix Transport Consultants
16 Springfield Court
Stonehouse
Gloucestershire
GL10 2JF

Lucy White
Cheltenham Borough Council
Planning Department
Municipal Offices
Promenade
Cheltenham
Gloucestershire
GL50 9SA

By e-mail: Lucy.White@cheltenham.gov.uk

11 September 2020

Dear Ms White,

**Proposed Housing at Oakley Farm, Cheltenham
Comments on Planning Application 20/01069/OUT, concerning Transportation Matters.**

Helix Transport Consultants Ltd are appointed by [REDACTED] Creevesyde and [REDACTED] at Half Acre on Harp Hill, to review the traffic and transport implications of the proposed development of 250 dwellings on the former Oakley Farm site in Cheltenham; planning application ref: 20/01069/OUT.

It is noted that the local highway authority has raised major concerns with the assessment method and outcome, which are shared. Our analysis corroborates these concerns and identifies new areas that require additional consideration.

The following sections consider, in turn, the overly simplistic trip generation and distribution assumptions, the lack of consideration given to non-car accessibility and the weaknesses in the traffic impact assessment and mitigation proposals.

Trip Generation & Distribution

The applicant's trip generation assessment utilises outputs from the Trip Rate Information System (TRICS) database for typical suburban housing developments. The applicant's consultant then assumes a distribution model based exclusively on the 2011 Census journey to work data. In reality, not all trips are work-related. The following table is taken from the most recent national travel survey.

Department for Transport statistics
National Travel Survey

Table NTS0502

Trip start time by trip purpose (Monday to Friday only): England, 2015/2019¹

Start time	Commuting	Business	Education	Percentage				Holiday / Day trip / Other	All purposes
				Escort education	Shopping	Other work, other escort and personal business	visiting friends / entertainment / sport		
0800 - 0859	20	3	29	23	4	14	3	4	100
1700 - 1759	32	3	3	2	12	20	20	8	100
All day	18	4	9	8	17	19	18	9	100

The above demonstrates that the distribution assumption used by the applicant's consultant is based on what only a small proportion of travelling public wish to access. There are, for instance, no car trips assumed to distribute to the nearest free primary school. This school is well over 1Km from the centre of the site (following the shortest pedestrian route) which should be considered too far for most primary school-age children. Similarly, the nearest free secondary school is around 2.5Km which is beyond the recommended threshold to attract walk trips.

Apart from further consideration of distribution and journey purpose, more consideration should be given to mode share. The analysis is premised on the average situation. According to national statistics, the average person in employment is 12% likely to walk to work. Even given the proximity to the local Sainsbury's it is difficult to imagine that there are that many walkable employment opportunities.

In practice, with the exception of the Sainsbury's supermarket, the site is somewhat remote from local services or employment opportunities. This is demonstrated in the PFA TA Table 5.2. It is considered that, if due consideration is given to the specifics of the site, in terms of where people might travel to and how they might get there, it is likely that the traffic implications on the local highway network, particularly to the west of the site, will be found to be significantly greater than currently envisioned.

Non-Car Access Opportunities

The highway authority has highlighted a lack of geometric details on how the proposed development will provide appropriate pedestrian and cycle infrastructure.

There are, however, more fundamental flaws than geometry. In the first place, the pedestrian access strategy is based on the use of a footpath network. The problem with this strategy is illustrated by photographs contained in the PFA TA. Closed-in paths or accesses with no natural surveillance will inevitably

give rise to fears over safety. The photographs are taken on bright sunny days. The perspective is somewhat different in the case of the lone worker returning home in the winter months when it is dark. The developer might, although hasn't, suggest that cutting down the trees/shrubs that create hiding spaces and introducing a CCTV surveillance system might be necessary. Even with these measures, there are areas clearly identifiable on the proposed masterplan where there will be no natural surveillance and/or are too far away for any observer to offer timely assistance. It will be of little comfort to know that an incident might be filmed.

The alternative route for pedestrians will be to follow the footways flanking the proposed access road. This route benefits from the surveillance of the passing cars and will be the route of choice for anyone concerned by the issue highlighted above. Unfortunately, this route heads away from the local services, climbs a steep gradient over a long distance and alights on Harp Hill in a position where there is no footway connection. It is also then a steep descent down Harp Hill back towards Priors Road.

In practice, the applicant's strategy is likely to put many people off walking. This is contrary to current policy guidance which seeks to prioritise non-car access.

In terms of public transport, it is commonly accepted that the maximum walk distance to a local bus stop should be 400m. This is so as to make the provision conspicuous, convenient and reachable to those with mobility impairment. The PFA TA explains that the local bus stops are 750m or 800m from the site and presents no proposals to change this. Under the circumstances, bus access is neither conspicuous, convenient nor reachable to those with mobility impairment.

Given the above, the applicant's strategy will not encourage the uptake of bus use. This is contrary to current policy guidance which seeks to prioritise non-car access.

Traffic Impact Assessment and Mitigation

The highway authority has indicated that they do not accept the applicant's conclusion that the off-site highway impacts are insignificant, and indicate incredulity over the claimed benefit of the only proposed highway works; which involves some very modest widening at the Harp Hill and Hewlett Road arms of the double mini-roundabout arrangement on to Priors Road. This is entirely agreed with.

To elaborate, the Junctions 9 model considers a proposed widening on the Hewlett Road and Harp Hill arms to 5.5m. In both cases, the increased entry width will mean that the model will assume that it is possible for two cars to enter the junction at the same time. In practice, however, the illustrated geometry makes this highly questionable. In the case of Harp Hill, it is highly doubtful that a vehicle would even attempt to enter the small budge proposed on the entry arm as it off the natural approach angle, or if this were attempted, that there would be enough space left for another car to pull alongside, given the very tight proposed geometry.

As the highway authority has already indicated, the most likely outcome of the proposal is, in practice, no meaningful change to the current junction operation.

The PFA TA even introduces its own doubts over the proposals by highlighting that it will adversely affect the pedestrian crossing points at this junction.

Given the above, the assessed do-nothing scenario is the most likely outcome and, with queues predicted to increase to 42 vehicles, this should be considered to be a severe impact on existing road users, which is contrary to development policy.

Alternative Strategy

There is no doubt that the focus of transport activity will be to/from the west of the site. There are, however, substantial obstacles to sustainable outcomes inherent in the proposed scheme.

The developer should be encouraged to look at alternative means of access if the local planning authority is inclined to approve a development on the site. GCC's latest highway design guidance moves somewhat away from the traditional prescription of a road with a segregated footway. This opens up the possibility of an all-mode access via the existing farm track for a proportion, if not all, of the proposed development. Under this scenario, the road achieves some natural surveillance, making non-car access more attractive.

If an access to Harp Hill is still deemed necessary it is logical for this to emerge at the very southwestern corner of the site where it might connect with the existing pedestrian infrastructure at a point where the climb to/from the site will be minimised, as far as possible.

If as anticipated, the developer's consultant will be issuing an addendum report we would be grateful to receive notification of this so as to be able to comment further.

I look forward to hearing from you in due course.

Yours sincerely

James Hunter BEng (Hons) MCIHT
Helix Transport Consultants

WINDLEYS FARM,

HAM LANE,

CHARLTON KINGS,

GL52 6NJ

19-8-20.

FARM.

PLANNING

Rec'd 20 AUG 2020

SERVICES

I wish to object to the application by Hitchens to build houses on the land around Oakley Farm. The field is on the outer limits of the Cotswold AONB, such can be seen by developers as a cherry ripe ring, and of no particular benefit to the rest of the AONB. If a piece of land is allowed to go for building, when does it stop? Already the land around Cromwell Court, in the AONB, has controversially been given permission for houses built on it. One could foresee the creeping pace of builders trying to wriggle their way all the way down Greenway Lane if the principle is not firmly established that the AONB is 'no go' and inviolate for speculative developers.

Oakley Farm land is at present a 'breathing lung' for the suburbs of Cheltenham, and it should remain so in perpetuity.

Yours faithfully



①



Wadleys Farm,
Ham Lane,
Charlton Kings,
Cheltenham.
GL52 6NJ
10th August, '20

Dear Sir / Madam,

Re: Development Proposed at Oakley Farm,
Priors Road,

I should have thought
the developer would know that Oakley
Farm is in the Cotswolds AONB and as
such, is subject to the highest possible
protection from development. Indeed,
Cheltenham Borough Council has been very
vigilant in protecting the AONB on the
 outskirts of Cheltenham in the past, and
I hope will continue to do so with regard
to this application.

Oakley farmland forms
part of the lower slopes of the Cotswold
Downs and as such is the home of much
wild life. This natural habitat would
certainly be destroyed if it became covered

②

concrete and dwellings.

The visual impact would be horrendous from Priors Road, with uses stretching up the hillside and could in no way enhance the beautiful environment.

Harp Hill is far busier than ever it is, even when GCHQ had a site under the corner. All the houses constructed on the old GCHQ site have resulted in a vast increase of traffic all times. The appalling state of the road indicative of this and Harp Hill in no way, would be able to cope with the increased traffic usage if this application is permitted.

These days flooding seems an on-going problem - increased unpredictable heavy downpours seem to be occurring more often, causing flooded roads, drains and houses. Green fields are nature's drainage.

(3)

Where will the water go if the farmland covered in ~~con~~ concrete? This application would exacerbate the flooding problem in Priors Road and must be refused to alleviate a potential serious nuisance.

As for demolition of the farmhouse and buildings - I refer you to the Town in recently adopted:

Policy L2 Landscape

"Conversion of rural buildings"

whereby no "rebuilding" should be permitted which would and should negate the

proposal to demolish Oakley Farm House.

I hope Cheltenham Borough Council will refuse this application, it would otherwise create a precedent for further applications within the AONB on the outskirts of Cheltenham, and be utterly detrimental to the ethos of our town.

Yours faithfully,



The Gray Horse.

From: [REDACTED]
Subject: 20/01069/OUT
Date: 1 Mar 2021 at 07:54:43
To: documments@cheltenham.gov.uk

Dear Mrs White,

I wish to object to the above in the strongest possible terms.

Walking on the Hill yesterday was a seriously dangerous thing to do. Non-stop cars forced walkers into driveways for safety and cyclists onto verges. We all literally put our lives at risk. Many stopped to enjoy the unobstructed views as they took their 'COVID lockdown exercise'.

The road is a vastly and heavily over-used route between six ways and the multiple roundabout junction at the bottom of the Hill, but to allow many more hundreds of cars onto it from the 'deer crossing' sign would create an extremely dangerous situation. At morning rush hour this lower junction is already hugely clogged up when traffic from the Hill joins the large amount coming from the Battledown/Sainsbury development plus the volume from Prestbury. The overall numbers of cars going down the hill has increased vastly over the last few years. Please don't allow more.

Apart from the above, these pastures have the highest level of protection - AONB !!

Please can the Planning Committees listen to my plea and refuse this application.

The Gray House
Harp Hill

[REDACTED]

Haytor
Harp Hill
Cheltenham
GL52 6PR

13th August 2020

Dear Mrs White

Re: Objection to planning application 20/01069/OUT Oakley Farm Pasture Slopes AONB.

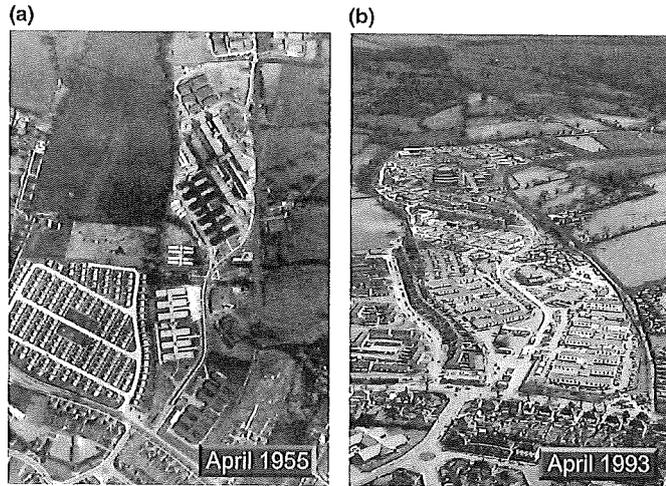
I wish to object to the above planning application for the following reasons, and would like this objection to be submitted against the planning application on Cheltenham's Public Access site:

Setting

In the supporting documents, the applicant states that the harm to Oakley Farm Pasture Slopes (the site) due to loss of sloping pastures will be limited because of the existing harm caused by current dwellings. I wholly disagree with this statement for the following reasons. To the south of the site, Battledown Estate contains dwellings set in at least ½ an acre of land (some properties within much bigger plots) which results in settings which complement the surrounding AONB and in particular, the site. Moreover, residential development on Battledown began during the Victorian era and dwellings on Harp Hill in particular, were constructed later, during the 1930s; therefore, these dwellings have stood adjacent to the site for almost 100 years - long before the site was designated AONB.

With this in mind, AONB status was assigned to the site in the 1960s and in spite of its proximity to the sympathetic development of Harp Hill and the wider Battledown Estate. This is because the character of the landscape was deemed unimpaired by its proximity to urban development and thus its intrinsic qualities and character were recognised as characteristics of an area of outstanding natural beauty. Furthermore, on viewing the site from various vantage points around the residential area (Prior's Road; Pillowell Close; Brockweir Rd; Aggs Hill) the dwellings on the edge of the Battledown area (Harp Hill) cannot be seen easily as they are set in heavily treed areas of sparsely developed land. Because of this, the site merges seamlessly with this sympathetic residential area giving a semi-rural aspect to this space. Similarly, when viewing the site from The Cotswold Way path (at Prestbury Butterfly Reserve and Cleeve Common) it is clear that the site is situated adjacent to a dense treed area to the south, and does not resemble the densely urban nature of Cheltenham town and the 'hard edge' as it is described in the application.

The largest area of development to the north and northeast of the site also existed when the site was assigned AONB status. This area was occupied by the large expanse of GCHQ buildings, which were constructed in the 1950s. The applicant maintains that these new residential dwellings on the old GCHQ site form a "stark and harsh" edge with the site and the AONB, which detracts from the site's beauty, thus negating its value and sensitivity. I believe these claims are simply not true and again, this is demonstrated in the designation of AONB status in the 1960s and a later revision in the 1990s. Contrary to these claims, the area as a whole plays an important role in merging Cheltenham with its wider AONB and thus is seen as a gateway to the wider countryside. This is attested by the many hundreds of people who walk Harp Hill and surrounding lanes to access this special area of Cheltenham. As can be seen in the photograph below, the surrounding areas of the site remain largely unchanged in terms of developed land as the brownfield GCHQ site buildings have simply been replaced with current residential and retail development.



Former GCHQ site and the Oakley Farm site to the right of this.

Visual impact

The applicant's comments that the site is not visually prominent from Harp Hill "save important views towards Hewlett's Pavilion and the Reservoir boundary" are not the case. In actual fact, the entire site is visible from various properties along Harp Hill. From both Hill Covert and Haytor, the farmhouse and farm buildings at the base of the site can be seen clearly, even during the summer months.

The applicant refers to the site as a "rural and green wedge character that contributes to the setting of Cheltenham", and yet in several areas of the Site Assessment document it comments that the lower slopes of the 'wedge' are not as sensitive as the upper area and therefore warrant development. Yet, the entire site, including the lower slopes can be seen clearly from surrounding vantage points such as Prestbury Butterfly Reserve (see photograph below), and so designating parts of the site as 'more sensitive' and 'less sensitive' is problematic and merely serves as a justification for development and in turn, destroying the beauty of this AONB site. Currently, the farmstead (circled on the photo) stands at the very base of the lower slopes and can be seen clearly from Harp Hill (even when trees are in leaf) and from various vantage points including Prestbury Butterfly Reserve (from where this photo was taken). Parts of the lower slopes are obscured by a densely treed area which adds to the beauty and character of the site and should not be identified as 'less sensitive'. Furthermore, conserving the densely treed site by rejecting this development will negate the proposal by the applicant to "Create a new woodland belt that will provide biodiversity enhancements an [sic] improvements to the local Green Infrastructure Network."



A clear view of the entire site from Prestbury Butterfly Reserve with farm buildings marked – taken July 2020

From a visual perspective, the lower slopes of the site are as equally sensitive as the higher areas as stated above; this is also demonstrated by the view from the Public Right of Way that runs the length of the slope to the west of the site which has a clear view of the site merging seamlessly with the Cotswold scarp and Cleeve Common Site of Special Scientific Interest (SSSI). I do not concur that the site should be demarcated into sensitive and non-sensitive areas and fail to see the evidence for this categorisation in the application. After all, the entire site was designated AONB, not just the upper slopes. Moreover, the lower areas of the site can be viewed clearly from various points from the north, west and northeast of the site, from both high up on the AONB and from the lower AONB and surrounding residential areas, and therefore constitutes this entire AONB site as having highly sensitive landscape character.



Uninterrupted views of the site and the wider AONB Cotswold scarp from the PRoW (86) on the west of the site.

The western Public Right of Way (PRoW 86) is an important path that affords walkers views of the site itself and the wider Cotswold AONB, scarp and Cleeve Common beyond. The footpath allows users to enjoy the AONB off-road, and leads into Oakley Grange and towards Wyman's Brook and onto further countryside via other designated PRoWs.



A clear view of the AONB site's lower slopes from dwellings on Wessex Drive

Suitability for development

It is important to acknowledge that a Landscape Character and Sensitivity Assessment was carried out on land around Cheltenham in 2015, commissioned by Cheltenham Borough Council, in which Oakley Farm was included (Ryder Report, 2015). The report concluded that the overall **visual sensitivity** of the site was **high**. In addition, the overall **landscape sensitivity** was assessed as **high**, and due to its AONB status, visual impact from surrounding dwellings, and the connections with the escarpment slopes, the **overall value** of the landscape was also assessed as **high**. This resulted in a landscape capacity of **low suitability** for development.

Vegetation

Trees on the site make up an important aspect of the landscape of Oakley Farm and the wider AONB. They also provide important cover and habitat for existing wildlife. Indeed, the UK government acknowledges trees as having an "important role in the UK's efforts to hit net zero carbon emissions by 2050" (Department for Environment and Rural Affairs, Nov 2019). At a time when climate change has identified the importance of trees to our environment in removing emissions, it is bewildering that the applicant is suggesting that the removal of established trees that provide significant canopy can be mitigated by a 'replanting scheme'. This new treescape will be slow growing and provide a considerably smaller canopy which will not only damage the intrinsic qualities of the natural landscape of the site but will also displace wildlife from their natural habitats. I urge CBC Planning Officers to reject this application and allow this precious AONB land to be left alone as nature intended.

Archaeological significance

The applicant states:

"All effects on the buried archaeological assets will take place during the Construction Phase. Any archaeological assets are likely to be destroyed by the construction process, but the assets are considered to be of low to negligible sensitivity on account of their state of preservation, lack of dating evidence, and lack of interpretation."

As yet, there is no report from the applicant detailing the archaeological survey and therefore I ask that the Planning Officers reject this claim of any assets being of low sensitivity on the basis that they are unfounded.

Proposed access road to the site

The applicant refers to the proposed new access road to the site (off Harp Hill) as opening up "long distance views to Cotswold scarp". These long and short distance views of the site and the Cotswold scarp beyond have always been accessible from Harp Hill. This is due to the previous landowner maintaining the hedgerows (see photographs below). The current landowner (the applicant) has neglected the hedgerows which has in turn

obscured the previously enjoyed views. This action has informed part of their 'green infrastructure plan' in the application, which aims to conserve and enhance using a landscape design led process, including 'opening up' the views of the Cotswold scarp. This kind of disingenuous action which is against the spirit of community is, in my opinion, a weak justification for development of the AONB site and the application should be rejected by CBC planning department.



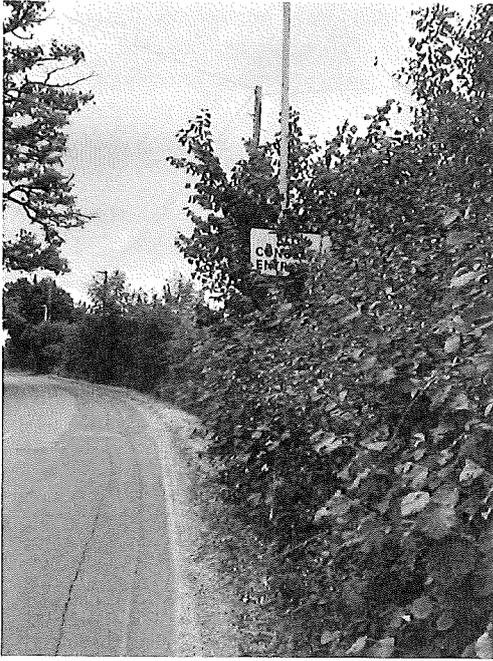
The hedgerow looking east along Harp Hill (c2015)



Clipped hedgerow looking east along Harp Hill (before the hedgerow was neglected)



Neglected hedgerow now, looking east along Harp Hill (taken 5/8/20)



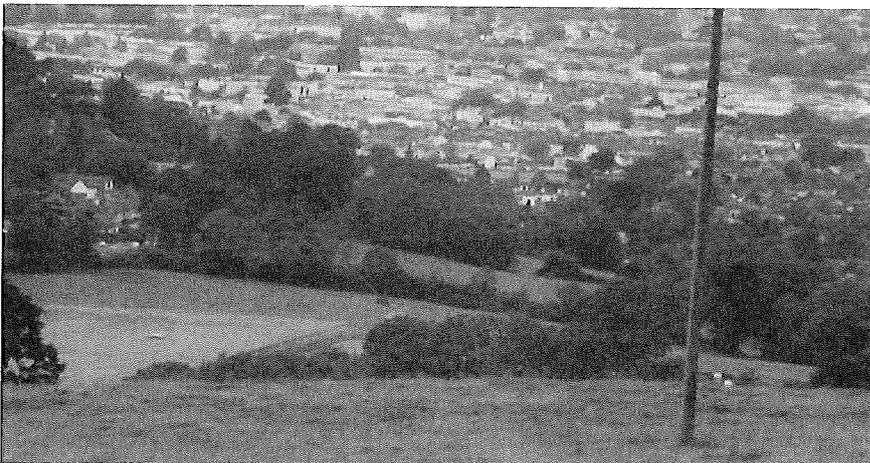
Hedgerow now, looking west – neglected and obscuring important road signs (taken 5/8/20)

The applicant also states that development near Hewlett’s Pavilion will not take place, acknowledging the pavilion’s heritage status. Moreover, they state that:

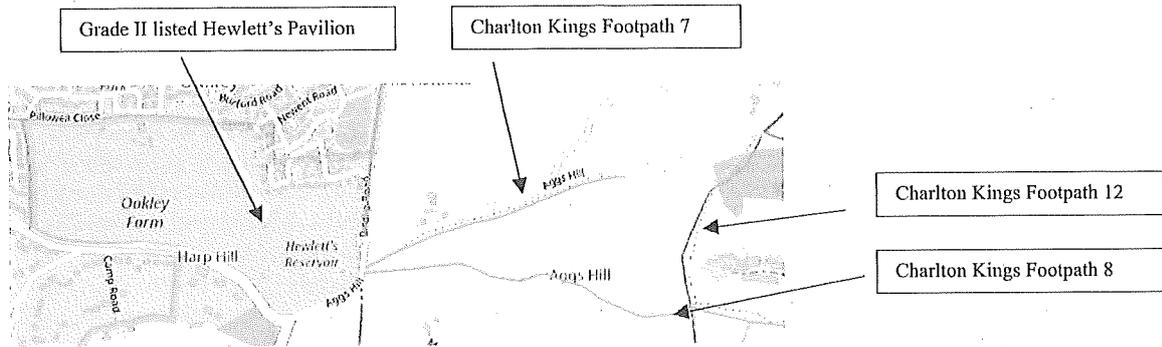
“From Harp Hill there are important views to the listed pavilion and boundary structures of the reservoir which are only obtained from Harp Hill.”

This is factually incorrect as the pavilion and reservoir can be viewed from several points around the area. The heritage site of Hewlett’s Reservoir with Oakley Farm as its backdrop, can be viewed clearly from the AONB footpaths (7, 8 and 12) adjacent to Aggs Hill (see photograph below). The proposed development will significantly damage the view and setting of the Grade II listed pavilion due to the proposed development’s proximity to this significant heritage building.

Furthermore, the view of the pavilion from Harp Hill sees it in a rural parkland setting with the Oakley Farm site in its foreground. If development were permitted as suggested in the planning application, the new dwellings and proposed access roads would be clearly visible from Harp Hill and would be highly damaging to this Grade II listed Pavilion of Hewlett’s Reservoir.



Hewlett’s Pavilion and its backdrop, Oakley Farm, visible from PRoW Charlton Kings Footpath 12



Hewlett's Pavilion and its backdrop, Oakley Farm, visible from Charlton Kings Footpaths 7, 8 and 12.



According to the site plan layout, this view of the Pavilion from Harp Hill will be damaged by the access roads onto the site and associated vehicles.

The above shows that the proposed development will be **highly damaging** to this Grade II listed heritage asset which has been afforded listed building status because of its special interest and therefore warrants its protection and preservation according to the Principles of Selection for Listed Buildings (Department for Digital, Culture, Media and Sport - 2018). Furthermore, in giving its reasons for designation of Grade II listed status, Historic England states of the pavilion:

"Architectural interest: the building is an ornamental pavilion with picturesque detailing, which belies its functional purpose and instead gives the appearance of a country house garden building."

Therefore, I would urge Planning Officers to uphold this afforded status and to preserve such an important heritage asset of Cheltenham by protecting it from a large-scale residential housing estate which would undoubtedly ruin the cherished 'appearance of a country house garden building' in its AONB Setting.

Road Network Infrastructure

There have been a number of traffic surveys on Harp Hill, requested by residents, over the past 10 years (2011, 2014, 2018). I have noted from the accumulated raw data that over this period there has been a significant increase in volume of traffic, and associated speed exceedances, on Harp Hill. This was acknowledged by Gloucestershire Police in an email to a local resident (17/5/20) commenting that the survey revealed "...a fairly high level contravention of the 30mph limit." With this in mind and considering the proposed planning application, typically, each house on the proposed site will have several associated vehicles and thus, the increased traffic load on Harp Hill and the immediate adjoining road network, will have a deleterious effect on existing users of Harp Hill, in particular, driver waiting times at the junctions surrounding the area: Harp Hill/Prior's Rd and Sixways. Currently, a large volume of traffic comes into Cheltenham from the Prestbury direction along Prior's Road rendering this route extremely congested at peak times. In addition, a large

volume of drivers travels via Harp Hill as a cut through in both directions between the A40 London Road and Prior's Rd, and to access St Edward's Junior School, Glenfall Junior School, Charlton Kings Junior School and Balcarras School (there is a significant decrease in volume during school holidays). This heavy use is changing the characteristics of Harp Hill and has a cumulative effect on the adjoining Hales Rd and Hewlett Rd causing traffic queues at the Hales Rd/London Rd junction and the Greenway Lane/London Rd junction. It should be acknowledged that Harp Hill is semi-rural in nature, particularly at the east end of the hill where it is winding and narrow in places with blind bends. Two problematic points are at the egress/access to the PRow on the western side of the site making it extremely dangerous for pedestrians crossing Harp Hill to the footpath, and near the entrance to Hewlett's Reservoir, the Oaks and High View, where traffic travelling around the blind bend creates a dangerous spot for walkers, cyclists and horse riders. The semi-rural characteristics of Harp Hill and its locality mean it is frequently used by pedestrians to access the footpaths within the Cotswolds AONB and is used by cyclists and horse riders accessing the wider Cotswolds road network and AONB paths and bridleways. Likewise, as residents, we walk the roads of Harp Hill, Greenway Lane and Mill Lane for enjoyment, exercise and to access and egress our home. I would like to stress that it is vitally important to enable existing residents to be able access/egress their homes safely, and to enjoy walking, cycling and running along roads in safety, and to significantly add to the volume of traffic associated with a housing estate would certainly diminish quality of life for everyone. As the volume of traffic increases (as per traffic survey data indicates) other non-vehicular users of the roads are being forced away. I can only see this situation deteriorating if this development is permitted.

It should be noted that when development was permitted at the north east end of the old GCHQ site (Eden Villas), access/egress was permitted for vehicles of only 40 houses due to the unsuitable nature of the surrounding roads (Aggs Hill, Mill Lane, Harp Hill and Greenway Lane). This condition was implemented in 1998 and reiterated in 2014 as 'not negotiable' despite appeals, to safeguard the surrounding road network. In the Oakley Farm application documentation, the applicant states that in relation to this decision regarding Eden Villas, Harp Hill was not included in the roads designated as unsuitable, despite Harp Hill being the main route out of the estate and into Greenway Lane and Prior's Road. The reason given is that Harp Hill has different characteristics to the other rural roads in the area. However, I would urge Planning Officers to walk east up Harp Hill and note the similarities between the east end of Harp Hill and Aggs Hill where they meet at the junction of Mill Lane, as both roads have no road markings, no footpaths, are narrow and winding in places, and both have streetlights and some interspersed kerbing. Moreover, there is a short section of kerbing directly opposite Hewlett's Reservoir on Harp Hill, which is frequently mounted and as a consequence, the verge has been severely damaged several times. At this point in the road, it is difficult for two large cars to pass each other, and this was especially dangerous during the construction of Eden Villas because of the road's narrowness and unsuitability for large vehicle and heavy traffic.



Frequent traffic queues at the junction of Harp Hill and Prior's Road – taken 26/6/19 at 08:31.

Flooding

The applicant states that "the proposed development will be safe from flooding, that flood risk will not be increased and overall flood risk in the area will be reduced". I fail to see how concreting a large expanse of an AONB site would reduce the flood risk in the area, and the applicant's statement is contrary to our experience.

Prior's Road and the adjoining Hales Road both flood during heavy rain. Flooding also extends to the traffic lights at Sainsbury's and into Whaddon Road opposite Simpson's Fish and Chips. This makes pedestrian use of this area such as crossing the roads and using the bus stops at the bottom of Harp Hill and on Whaddon Road very dangerous. Furthermore, the congestion around Tesco Express on Hewlett Road adds to the chaos in peak hour traffic as vehicles and pedestrians try to negotiate the narrow entrance to its carpark and adjacent pavements. Traffic typically crawls along roads during flooding and everyone is affected. Likewise, homes on Wessex Drive, adjacent to the site, experience flooding through their properties and gardens, and some gardens have storm drains to withstand the runoff from the hill. To develop this site would negate the important role of the land to soak up water during heavy rainfall and would only exacerbate an already problematic area during heavy rainfall.



Harp Hill/Hales Rd junction next to bus stop - taken 14/11/19 at 07:50.

Housing land shortage

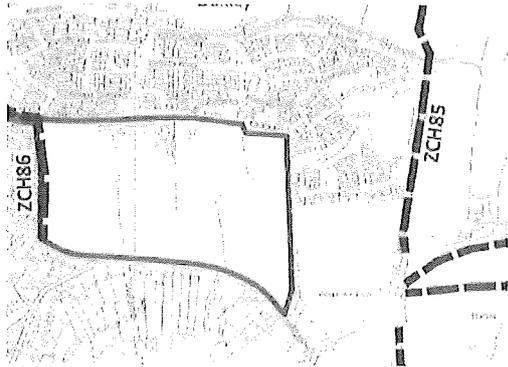
Regardless of a housing land shortage, Cheltenham's Cotswolds AONB should not be considered for development as stated in the National Planning Policy Framework (NPPF):

"planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest" (NPPF, 2019).

Whilst there is a small shortfall in land supply in Cheltenham (as stated in the latest plan), land that is not designated as AONB should be explored for potential development. Having looked at the Site Assessment document for this planning application, I fail to see how this proposed development adheres to a 'restrictive approach' in terms of planning, which is necessary to conserve and enhance the AONB's attractive character and location on the urban fringe (The Cheltenham Plan, 2020).

Firstly, such a development will destroy biodiversity on the majority of the site, impose unnecessary tree felling and irreversibly destroy a part of Cheltenham's AONB. The replanting of trees is counterproductive as its purpose is to mitigate the destruction of the trees in pursuing this development. Furthermore, it is noted

that four public access routes will be generated within the site which claim to “Provide new connections including pedestrian access points and new footpath routes that provide access to land that was not previously publicly accessible”. These footpaths will not provide new connections; they will simply enable residents of the proposed housing estate to access/egress the estate to the surrounding roads and paths which will neither enhance nor conserve the area. They will not lead to the wider AONB or designated PRoWs, but in fact will damage the view afforded to users of the current PRoW to the east of the site. As can be seen below, the PRoWs in the area (particularly ZCH85) is currently easily accessed from Harp Hill and Greenway Lane, and the semi-rural characteristics of both these roads lend themselves to providing an enjoyable walk/cycle/ride to the wider AONB. The public access routes proposed on the site do not contribute to accessing the wider AONB and designated PRoWs.



Secondly, this site has been afforded the highest protected status because of its national significance and beauty, and thus provides a habitat and playground for important flora and fauna species which sustains a rich biodiverse environment. Therefore, I fail to see how the proposal to “create publically [sic] accessible play spaces for the benefit of new and existing residents within the local community” by destroying this environment are so called ‘opportunities’. Surely this level of destruction of the natural environment to create a play space for residents is simply degrading the natural environment in favour of urbanisation and is neither ‘conserving nor enhancing’ the AONB as required and stated by the Cotswold Conservation Board. Also, it should be noted that current local residents and visitors to this area have access to several excellent play spaces in the vicinity: **Queen Elizabeth II Playground, Prior’s Farm Playground, Clyde Crescent Playground, Whaddon Recreation Ground**, and numerous ‘natural’ spaces across the AONB via public footpaths. Why does this area require a developed play area? I urge the Planning Officers to reject this application on the basis that it should not provide for a housing shortfall nor provide the aforementioned ancillary development.

Ecology

In the documentation, mowed footpaths through meadows are also cited as benefits to the site. The merits of creating wildflower meadows for encouraging wildlife and a biodiverse area are known and rightly encouraged. However, I fail to see how creating a wildflower meadow at the top of an expansive AONB site to mitigate for harsh, large-scale, urban development on the majority of the site will attenuate the damage proposed in this application. Again, this justification is weak as the site is already a biodiverse area, home to a variety of flora and fauna, with its intrinsic natural beauty and national significance being recognised by its AONB protected status.

Similarly, other proposed mitigating effects such as a ‘vegetation buffer’, ‘development set away from southern edge’, and ‘southern pasture retained’, all point to maintaining the upper slopes and the visual impact from Harp Hill and the wider AONB. However, the view of the site itself from the northern/northeastern edge (Pillowell Close; Brockweir Road; Birdlip Road; Bream Court) will be severely damaged if development is permitted. Indeed, residents on the northern side of the site are afforded splendid views of this highly protected land with a near seamless ‘green’ view due to the low-density development and heavily treed landscape of Harp Hill. As previously stated, properties on the Battledown Estate typically sit in plots of at least ½ an acre and sympathetically blend into the sensitive green space that they look on to. Policy CE1 – landscape, states that proposals that are likely to impact on the landscape of the AONB should have regard to the scenic quality of the location and its setting and ensure that views into and out of the AONB are conserved and enhanced. The views from existing residential dwellings to the north, northeast and west of the

site, including from the PRoW (86) onto this AONB site will be severely impacted and contravene the abovementioned policy within the Cotswold AONB Management Plan 2018-2023.

In conclusion, I would like to state that this planning application should be rejected outright due to the lack of detail in any of the proposal apart from an access road from Harp Hill. It is unfair to expect local communities and the local planning authority to effectively consider a proposal in its entirety, especially one of such magnitude and associated impact, with such a paucity of detail. Notwithstanding this, based on the information presented in this objection, I feel it would be deleterious for Cheltenham Borough Council to permit this development and allow the Oakley Farm site to be irreversibly developed to the detriment of our town and communities. It is therefore incumbent on the community and town planners to ensure this area is protected and conserved now, and for future generations to enjoy as it has been enjoyed for decades.

Yours sincerely



email : 

PLANNING	114 Hales Road
Rec'd - 7 AUG 2020	Cheltenham
SERVICES	GL52 6SU

REFERENCE PLANNING APPLICATION 20/01069/OUT

Our objections are as follows

Landscape

1. Adverse impact on views from Cleeve Common and Cotswold Way
2. Loss of much valued local countryside
3. A precedent for further housing development in similar areas of countryside

Housing Need

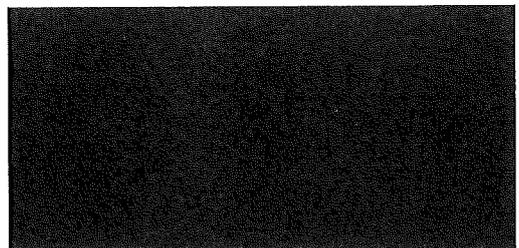
There must be more suitable sites than this: conversion of shops and offices, brownfield sites, less scenic areas before encroaching on an AONB

Traffic

1. Despite the description of footpaths, cycling routes and bus services in the application the reality is that many of the households will need to travel by car to shop, work and get to school. All using the access onto Harp Hill.
2. The access onto the site by construction vehicles from Harp Hill will be extremely obstructive for a lengthy period
3. Has there been provision for an alternative access to the development for emergency vehicles ? (required by law)

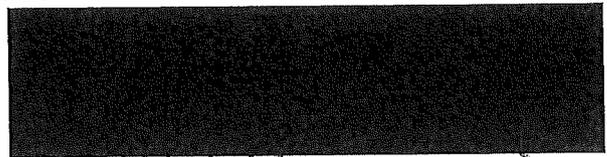
General

The County Council sold this land to a house builder, implying their unwarranted approval of the development of this much valued land



VE 1637 6808 3GB

SD 1pm



M.A Downview,
Chalford Hill,

Ref 20/01069/OUT

3/8/20



Stroud,
Glos.

Dear Ms White,

I am writing to object to the building of 250 houses on Oakley Farm. My name is [redacted]

[redacted] and am the

Granddaughter of [redacted] of Oakley Farm.

Thanks to my great Grandparents who went there along time ago with Grandma, [redacted]

[redacted] We had the most wonderful Childhood along with my close

Family and friends. There was always so much going on and jobs that had to be done. The milking of the cows, feeding cats, pigs, geese, chickens and collecting eggs and lots of mucking out! I used to love helping put the new clean straw down especially for " [REDACTED] " pony Prince who would roll in it as soon as it was put down. The farm also had an abundance of wildlife about including foxes, badgers, deer, bats and birds. The wonderful Oak trees supported a whole variety of creatures great and small (and still do today). The sweet smell of the new cut grass in spring when the silage was made Hay making in the summer heat! Black berry picking, bonfire night - to ^{the} snow in

③ the winter and the thrill of
Sledging [REDACTED] down Cook's
Meadow under the light from the Moon
So many happy memories for us, but
also for many other local people and
their families. I hope for the local
community and beyond that Oakley
Farm along with all the wonderful
Oak trees, flora and fauna is able
to carry on working her Magic for
many years to come.

Oakley Farm does sit in
an ANOB and so is protected and
should not be built on. There was never
any planning permission given.

Also traffic has always been
a problem in this area and even more
so now. At the bottom of Harp Hill
both big and small homes struggle to get

(4)

around the tiny roundabout along with all the normal traffic. Harp hill wasn't ever built with all this extra traffic in mind, its narrow steep hill with lots of parked cars and entrances to peoples homes. How will it manage with ever more traffic?

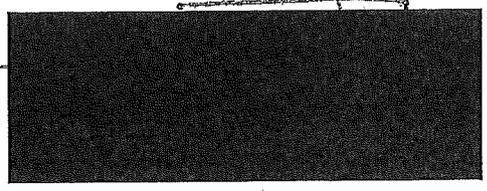
We are very aware for the urgent need for more housing but at what cost? just back in summer 2007 we had mass flooding and all ended in bottled water this could so easily happen again. Oakley farm fields already has a network of pipes running under its pastures but still the fields up above help act as a natural soak away - where will all this water end up when these last few remaining fields become yet more

Concrete?

As humans ~~some~~ of us never seem to know when enough is enough hasn't poor old Oakley Farm given up enough of her land already??

We all know that one day Oakley Farm would no longer be part of our family only in our memories. Its heartbreaking to think of the last few acres (once 150 now just 36) being built on, not just for us as a family but for everyone. The Oak trees we need our precious trees more now than ever, so do all the creatures great and small along with all the other wonderful varied trees, hedgerows grassland and wildflowers. Please to NOT allow them to build on Oakley Farm

yours faithfully
P.T.G -



53 Wessex Drive
Cheltenham
GL52 5AF

Planning Dept.
Cheltenham Borough Council
The Promenade
Cheltenham
GL50 1PP



3rd August 2020

Dear Sirs

Proposed development of Oakley Farm Pastures
20/01069/OUT

With reference to your letter dated 16th July, our comments on this proposed development remain the same as voiced when we attended the display of this proposed development at Cornerstones some months ago, namely

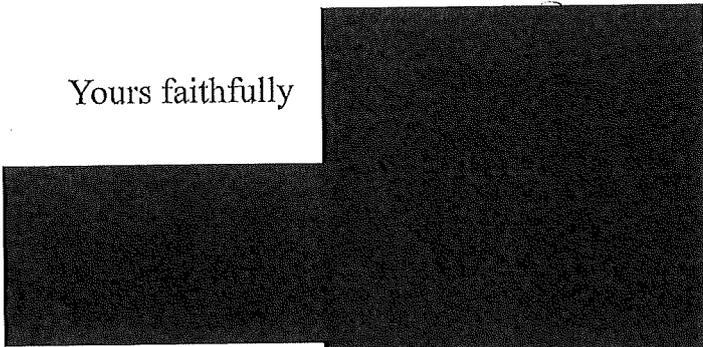
We believe the site is within the A N O B which we understood meant that the area is protected from this type of development

A road linking the site to Harp Hill would appear to be a very dangerous idea with the number of vehicles generated by the dwellings adding to an already busy road

Householders on parts of Wessex Drive and Harp Hill would lose their privacy and have their views blocked by the new buildings

Does the term 'ancillary facilities' include a school and Doctors Surgery?

Yours faithfully



OBJECTION TO PLANNING APPLICATION 20/01069/OUT – PROPOSED DEVELOPMENT AT OAKLEY FARM, PRIORS ROAD, CHELTENHAM

I wish to object to this Application on the following primary grounds.

Area of Outstanding Natural Beauty (AONB)

The proposed development site is within the defined AONB, where there is a presumption of no development of this type and scale being permitted. Granting of permission would set a dangerous precedent for further unwarranted and highly damaging incursions into the AONB and Cotswold Escarpment.

Site Not Identified in Local Plan for Development

The site is not identified within the Local Plan as being suitable for this scale and type of development and is wholly inappropriate to the local infrastructure capacity, particularly as regards road access but possibly also with regard to drainage and flood risk on the basis of such information as is currently available.

Loss of Green Space and Wildlife Habitat

The existing fields are a haven for local wildlife with several rare or endangered species observed in gardens close to the fields on occasions, including hedgehogs and grass snakes. It is difficult to imagine that these as well as the wide variety of other wildlife in the area are not dependent on the continued existence of the pasture and hedgerows.

The proposal for landscaping and public access is not consistent with maintaining a suitable habitat for many species and is likely to lead to increased littering, pollution and disturbance of habitat.

Increased Levels of Air Pollution

The Cheltenham BC area is defined as an Air Quality Management Area, with levels of nitrogen oxides (NOx) in particular, already close to or exceeding defined safe (statutory) levels at a number of locations. Existing and already committed developments will add to these pollution levels as traffic levels in particular continue to increase, as already permitted developments are completed.

Spot readings of NOx and particulates (PM10, PM2.5) that I took through 2019 using a portable monitor near the double roundabouts at the bottom of Harp Hill and along Hewlett and Priors Roads, indicated levels of one or both pollutants exceeding WHO safe level criteria, especially at peak times and therefore an increased level of risk to those with heart and lung conditions in particular, but also to the local population at large.

No significant development of this type that is not within the Local Plan should be permitted at all, until the statutory air quality parameters are in full compliance.

Inadequate Access to the Proposed Site

The proposed means of access, from Harp Hill, is not acceptable. The road is narrow and is used already as a 'rat run' at peak times to avoid some of the London Road junctions. It is not suitable for further traffic loading.

The road is used significantly by cyclists, horse riders and pedestrians. The pavement becomes very narrow near the bend at the top of the steep section and is also where a public right of way exits from the rear of Wessex Drive onto the road at the blind bend, creating significant risk for those crossing the road. There is no formal pavement between the entrance to the Battledown Estate and the junction with Greenway Lane, with pedestrians obliged to walk on the road for some sections. These sections in particular would become more dangerous with further traffic loading.

Page 416

The requirement to prevent significant increases in traffic loading has already been recognised in the restrictions on access imposed during the former GCHQ site development. Some further loading is already inevitable from existing smaller scale development currently underway in the locality. This should be the absolute limit.

The road is subject to many speed exceedances, encouraged by its steep gradient. Data from a 2014 speed survey showed that 93% of vehicles exceeded the 30 mph speed limit and in the morning peak, 75% of vehicles exceeded 33 mph, 10% exceeded 43 mph and a number were in excess of 50 mph.

In 2018 after nearly being knocked over myself by a speeding motorist whilst crossing the road from the public footpath, I made representations to the local Police and they arranged for a new survey which was completed in 2019. The Police reply to me at that time was as follows (email communication).

[REDACTED] <[REDACTED]@gloucestershire.pnn.police.uk>

To: [REDACTED]
17/05/19 19:59

1

[REDACTED]

As promised the speed equipment was placed on Harp Hill finally further to our email conversation in November 2018. As you can see there is high demand for the equipment.

I have today received an email from The Road Safety and Traffic Management Unit stating that the box went onto Harp Hill for a short amount of time and it showed that there was a fairly high level contravention of the 30mph limit.

As such the data has been passed to the Camera Enforcement Officers to action with a view of enforcement.

I hope that when actioned you will see enforcement on the road to reduce speeding on the road and make the roads safer for you and your family.

Apologies for the amount of time it has taken to get back to you.

If you have spoken to or raised these concerns with your local councillors you may want to let them know as well.

Many thanks

[REDACTED]

Police Constable 2120

Cheltenham Local Policing Neighbourhood Constable

Gloucestershire Constabulary

[REDACTED] Cheltenham Police Station | Lansdown Road | Cheltenham | GL51 6QT

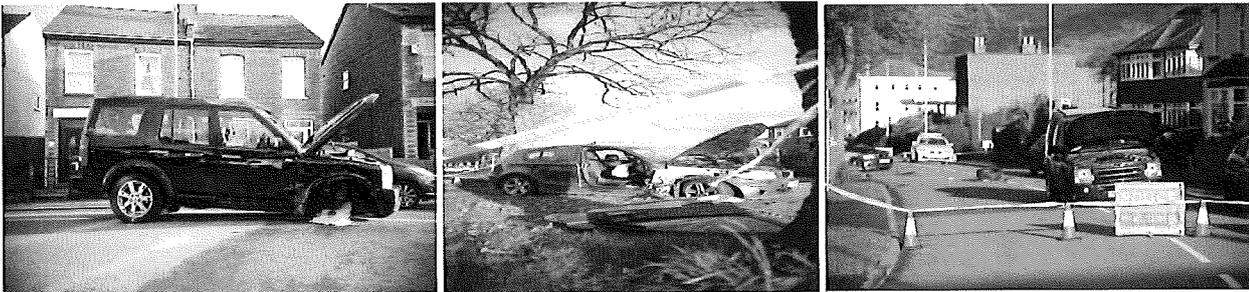
[REDACTED].01

www.gloucestershire.police.uk

It is evident from this that the speeding problem continues and this is further reason not to allow additional traffic load onto the narrow road. The installed passive traffic calming measures are frankly, a joke, being wholly ignored by most motorists travelling both up and down the hill, as the speed survey results show.

Additional Congestion and Risk on Nearby Roads

Harp Hill primary exits are onto the Priors and Hewlett Roads and (via Greenway Lane) onto a busy junction on the London Road. Priors Road from the mini roundabouts towards the Sainsbury junction is also a narrow road with parked cars restricting its width. Being the route to the closest supermarket and fuel locations for the proposed development, this section of road would see increased loading, creating additional accident risk along the narrow section where cars are routinely parked and for those exiting onto the road from Hillview Road, already affected by a blind spot created in the realignment of the road at the Sainsbury junction some years ago. There has been at least one accident along this section recently, shown by the following photographs.



Priors Road Accident, 2019.

There is also an existing problem with congestion at Hewlett Road where it exits onto the mini roundabouts at the bottom of Harp Hill, due to delivery trucks for the two shops located there parking just off the roundabouts, combined with motorists visiting the shops reversing out on to the road and/or parking on double yellow lines. This creates an accident risk, especially to pedestrians and cyclists and further traffic loading on this road can only make this problem worse. The following photograph illustrates one of the problems here, with cars approaching the roundabout or reversing off the shop frontage being obliged to move across areas which are blind to cars coming into Hewlett Road off the roundabout, or themselves forced to occupy the wrong side of the road at this busy junction.



As such, traffic loadings on these local roads should not be allowed to increase further, which will be the case if the proposed development is allowed to proceed.



42 Wessex Drive

Cheltenham

GL52 5AU

Oakley Farm Pasture Slopes AONB
(Cotswolds Area of Outstanding Natural Beauty)
20/01069/OUT

A Case for Development Refusal

Deer on Oakley Farm Pasture Slopes



Treescape at Oakley Farm Pasture Slopes



1 Contents

1. PART 1 - BACKGROUND INFORMATION AND LIST OF OBJECTIONS.....	3
1.1 DOCUMENT OBJECTIVE.....	3
1.2 HISTORY OF THE PASTURES AND AONB DESIGNATION.....	3
1.3 PUBLIC CONSULTATION.....	5
1.4 AONB (AREA OF OUTSTANDING NATURAL BEAUTY).....	5
1.5 WHERE ARE OAKLEY FARM PASTURES SLOPES?.....	6
1.6 THE CHELTENHAM PLAN AND JOINT CORE STRATEGY (JCS).....	7
1.7 LIST OF OBJECTIONS.....	7
2 PART 2 - DETAIL SUPPORTING THE LIST OF OBJECTIONS WITH PLANNING REFERENCES.....	8
2.1 PROTECTING AND ENHANCING THE AONB.....	8
2.2 THE LANDSCAPE.....	10
2.2.1 Landscape Character and Sensitivity Assessment of Cotswolds AONB. (Ryder). 11	
2.2.2 Cotswolds AONB Landscape and Management Plan. (Cotswold Management Board). 12	
2.3 THE CHELTENHAM PLAN AND SALA.....	12
2.4 ABSENCE OF A FIVE-YEAR HOUSING LAND SUPPLY - EXCEPTIONS TO PRESUMPTION IN FAVOUR OF DEVELOPMENT.....	12
2.5 CHELTENHAM'S SETTING.....	13
2.6 GREEN OPEN AREA OF COUNTRYSIDE.....	13
2.7 VIEWS FROM OTHER AREAS OF THE AONB.....	14
2.8 SETTING A PRECEDENCE.....	17
2.9 TOURISM AND THE SUSTAINABLE ECONOMIC GROWTH OF THE TOWN. ...	18
2.10 TREE AND HEDGEROW DESTRUCTION.....	20
2.11 WILDLIFE HABITATS.....	22
2.12 TRAFFIC LEVELS.....	23
2.12.1 Traffic.....	23
2.13 HARM TO THE RESIDENTIAL AMENITY OF ADJOINING LAND USERS AND LIVING CONDITIONS IN THE LOCALITY.....	24
3 PART 3 - CONCLUSION.....	25
3.1 AUTHORS CONTACT DETAILS.....	26

1. PART 1 - BACKGROUND INFORMATION AND LIST OF OBJECTIONS.

1.1 DOCUMENT OBJECTIVE.

- To place on record my objection to planning application 20/01069/OUT.
- To gain the support of local counsellors to stop this inappropriate development.
- To provide the Planning Authority with points for consideration before making a recommendation.

I would ask all readers to base their decision on policy (see part 2) and the views and opinions of local people (over 270 genuine and considered objections at time of writing).

1.2 HISTORY OF THE PASTURES AND AONB DESIGNATION.

The pastures were originally designated as part of the AONB with the rest of the Cotswolds in 1966, when this landscape with its sloping pastures, hedgerows and wonderful oak trees was acknowledged as an area of importance. In 1990, the boundary was reconfirmed and expanded to include the most western field of Oakley Farm, despite being bordered by residential areas and the huge and ugly MOD buildings of the old GCHQ site. Housing, which was in situ then, and housing which has more recently replaced the MOD buildings should not be used as leverage to mitigate development. Little has changed in over 30 years in terms of the built environment.

In assessing the proposal, the applicant repeatedly refers to Oakley Farm Pasture Slopes (which sits entirely within the AONB) as being surrounded or contained by residential development. The main counter argument to this of course, is its AONB designation history covered in the previous paragraph.

Aerial View of the AONB showing the old GCHQ - 1990s



Aerial View 2019



1.3 PUBLIC CONSULTATION

A public consultation meeting was held in the Summer of 2019. This was advertised in local newspapers and leaflets/letters were sent to some local properties giving only a few days' notice of the event. Some of the residents most severely affected by this potential development were not notified by letter at all and so missed the event. Any comments and views received from the applicant from this consultation should not therefore be considered a full representation of local opinion. Indeed, a better indication of local opinion can be gained from the public comments on the CBC Public Access website.

Amongst other issues, residents raised concerns about the adverse effect on their outlook but were assured that existing trees and boundary vegetation would be retained and where poor or non-existent, would be supplemented to protect visual amenity and the rural setting. The applicant's indicative site plan was therefore shocking. The applicant has, despite their reassuring words at the public consultation, shown little genuine consideration for the residential amenities and outlook of those properties in closest proximity to the proposal. The applicant has under-assessed the effect of the development on the properties closest to the proposal as having "medium" sensitivity and a "medium" magnitude of effect. The significance of effects is also assessed as "moderate adverse" when in fairness must surely be "major adverse". Properties on Birdlip Rd will potentially be dominated by the side elevations, (brick walls) of large houses which will presumably be "camouflaged" by small slow growing trees which will eventually further compromise the current openness afforded to main living areas and gardens. Their outlook and privacy will be severely compromised.

1.4 AONB (AREA OF OUTSTANDING NATURAL BEAUTY).

Some definitions:

AONBs are described as some of the UK's most cherished and outstanding landscapes.

An area of outstanding beauty is a designated exceptional landscape whose distinctive character and natural beauty are precious enough to be safeguarded in the national interest. **(NAAONB Landscapes for life).**

An AONB is an area of countryside which has been designated for conservation and is protected by the Countryside and Rights of Way Act 2000 (CROW Act). The act protects the land to conserve and enhance its natural beauty. Areas are designated in recognition of their national importance and significant landscape value and enjoy levels of protection from development similar to those of UK national parks. (www.gov.uk).

The Cotswold AONB is nationally designated for its landscape importance. **(Gloucester, Cheltenham and Tewkesbury Joint Core Strategy para 4.7.2.).**

AONBs are landscapes whose distinctive character and natural beauty are so outstanding that it is in the nation's interest to safeguard them. They have the same landscape status as National Parks. **(Cotswold AONB Conservation Board Management Plan Appendix 1).**

The statutory purpose of AONB designation is to conserve and enhance their natural beauty. **(Cotswold AONB Conservation Board Management Plan Appendix 1).**

The CRoW Act defines an AONB in England as an area that is not in a National Park but which appears to Natural England to be of such outstanding natural beauty that it is desirable that the protective provisions of part IV of CRoW should apply to it for the purpose of conserving and enhancing the areas natural beauty. *(Natural England – guidance for assessing landscapes for designation para 2.6).*

AONBs are designated areas where protection is afforded to protect and manage the areas for visitors and local residents. *(Natural England data.gov.uk ‘Summary of AONBs’).*

National Parks and AONBs have the purpose of conserving and enhancing the area's natural beauty, which encompasses its flora, fauna, geological and physiographical features. The government considers this to confer ‘the highest status of protection as far as landscape and natural beauty is concerned’. *(Natural England – guidance for assessing landscapes for designation para 8.3).*

The distinctive character and natural beauty of Areas of Outstanding Beauty make them one of the most special and loved places in England. The Government has a clear commitment to protect AONBs. *(The National Trust Summary of AONBs).*

1.5 WHERE ARE OAKLEY FARM PASTURES SLOPES?

Oakley Farm (GL52 5AQ) is located on the outskirts of Cheltenham behind Oakley Sainsbury's and adjacent to Harp Hill. (See photo below). It borders the grade II listed Hewlett's reservoir complex and sits entirely within the AONB.

The Cotswolds Area of Outstanding Beauty of which Oakley Farm Pastures is part, forms part of the Cotswold escarpment visible from Cheltenham town.



1.6 THE CHELTENHAM PLAN AND JOINT CORE STRATEGY (JCS)

This land is not in the Cheltenham Plan or Joint Core Strategy so has not been identified as an approved site for development and as such decision makers should adhere rigorously to NPPF policy and the Development Plan. In accordance with the Cheltenham local plan, the council should take guidance from the Cotswold Conservation Board and ensure the proposal is consistent with the policies set out in the Cotswolds Management Plan.

The absence of a five-year housing supply does not automatically mean permission should be granted. Protected areas such as the AONB should be excluded unless there are exceptional circumstances. In the case of Oakley Farm Pasture slopes, there are no exceptional circumstances.

1.7 LIST OF OBJECTIONS.

In addition to following rules, regulations, and guidelines, I understand that planning, put simply, is a balancing process. The planning balance in this case should be weighted in favour of **AONB conservation and protection**.

Note: Full justification and planning references and policies for these objection reasons can be found in Part 2.

Reason 1: All development proposals in or within the setting of the Cotswolds AONB will be required to conserve and, where appropriate, enhance its landscape, scenic beauty, wildlife, cultural heritage, and any other special qualities. Oakley Farm Pastures sits entirely within the **AONB** and should be protected and enhanced as such. This proposal does not conserve or enhance any special qualities of the site.

Reason 2: The landscape of the site which forms part of the Cotswold escarpment should be protected. The council's commissioned **Landscape Assessment** (Ryder Report) assesses the sensitivity of Oakley Farm Pasture Slopes to be "High" in all categories, with an overall landscape constraint as "major overall" and a resulting landscape capacity as "low overall".

Reason 3: The CBC Planning Policy Team have repeatedly deemed the land to be unsuitable in its "Call for Sites" **SALA** register. The rejection reason has been due to the site's location in the AONB.

Reason 4: Absence of a five-year housing plan – Exceptions to presumption in favour of development. The absence of a five-year housing supply does not automatically mean permission should be granted. Protected areas such as the AONB are excluded unless there are strong and clear reasons to the contrary. There are no such strong and clear reasons identified in the applicant's submitted documents.

Reason 5: It is important to protect Cheltenham's **setting** at the foot of the Cotswold escarpment. Oakley Farm Pasture Slopes with its parkland setting forms an important part of this escarpment and is viewable from parts of Cheltenham town and other areas of the AONB. Building on this land will undoubtedly affect the setting of Cheltenham.

Reason 6: Oakley Farm Pastures is undeveloped farmland which makes a positive and environmental contribution to an urban area of the town.

Reason 7: By extending the existing built environment, which is outside of the PUA, into this area of the AONB, the proposal would diminish and encroach on the pleasant and distinctly rural **views** currently seen from other areas of the AONB: Cleeve Common; The Cotswold Way; and other public footpaths in the general vicinity.

Reason 8: The proposal could set a **precedence** in relation to erosion of the Cotswolds escarpment.

Reason 9: The effect of this development on **tourism** and the sustainable **economic growth** of the town. Views of and from the escarpment are a considerable draw to visitors.

Reason 10: The risk of **mature tree and ancient hedgerow destruction**. The applicant states that hedgerows will be removed to accommodate development.

Reason 11: The likely damage to **wildlife habitat** and the necessity to force the relocation of those animals which currently roam freely on the pastures.

Reason 12: An undoubtable increase in **traffic levels and pollution and an adverse effect on air quality** on Harp Hill or close to any alternative access point.

Reason 13: Conditions in relation to traffic levels (a restriction on the number of homes served off Harp Hill) have already been imposed on neighbouring brownfield developers. See planning ref CB11954/43 decision notice, condition19.

Reason 14: The development would **harm** the amenities of adjoining residential properties and living conditions in the locality.

Reason 15: Development in the Cotswolds AONB should be based on robust evidence of local need arising **from within** the AONB. The Cotswolds AONB should not be required to accommodate the housing needs of Cheltenham town/borough.

Reason 16. The applicant repeatedly justifies this proposal by stating that the pasture slopes, (which sit entirely within the AONB) are surrounded by residential development. The history of the AONB designation given earlier in para 1.2 clarifies why housing which was in situ when the AONB boundary was set and housing which has recently replaced MOD buildings should not be used as leverage to mitigate development.

2 PART 2 - DETAIL SUPPORTING THE LIST OF OBJECTIONS WITH PLANNING REFERENCES.

2.1 PROTECTING AND ENHANCING THE AONB.

Reason 1 in consolidated list (Part 1).

The Cheltenham Plan, The Joint Core Strategy, The NPPF, The CRoW Act, and The Cotswolds Management Plan all make important references in numerous and different ways to the importance of the AONB and landscape. They all put great emphasis on conservation, enhancement and protection of the environment.

A view of up to 250 house roofs, parked cars, playparks and estate roads do not enhance a valued landscape or scenic beauty.

Given all the references below, it seems incredible that Oakley Farm Pastures which sits entirely within the Cotswolds AONB should be at risk of development. This view has been made clear by the Strategic Assessment of Land Availability (SALA) team who have repeatedly considered the land to be unsuitable for development due to its position entirely within the AONB.

- Planning policies and decisions should contribute to and enhance the natural and local environment by:
 - a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan).
 - b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland. (*NPPF para 170*).
- Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the broads. The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest. (*NPPF para 172*). *No exceptional circumstances exist.*
- The Cotswolds Area of Outstanding Natural Beauty (AONB) is the largest AONB in the country. Its management is co-ordinated through The Cotswolds Conservation Board. The NPPF confers on AONBs protection from major development, making clear that permission should only be granted in exceptional circumstances and where it can be demonstrated to be in the public interest. (*JCS para 4.7.1*). *There are no exceptional circumstances and objection comments on CBC Public access clearly show public opinion.*
- All development proposals in or within the setting of the Cotswolds AONB will be required to conserve and, where appropriate, enhance its landscape, scenic beauty, wildlife, cultural heritage, and any other special qualities. Proposals will be required to be consistent with the policies set out in the Cotswolds Management Plan. (*JCS Policy SD7*).
- The Cotswolds AONB is nationally designated for its landscape importance. Each local authority has a statutory duty under the Countryside and Rights of Way Act 2000 (Section 85) to 'have regard to the purpose of conserving and enhancing the natural beauty of the AONB'. In fulfilling this duty, Cheltenham and Tewkesbury Borough Councils will continue to work in conjunction with the Cotswolds Conservation Board. The Board has prepared the Cotswolds AONB Management Plan 2013-2018 to guide its management. The Management Plan is supported by more detailed guidance on a range of topics including a landscape strategy and

associated guidance underpinned by the Cotswolds AONB Landscape Character Assessment. The Management Plan and guidance are material considerations in determining planning applications in or affecting the AONB. (*JCS para 4.7.2*).

- The council should Conserve, Manage and Enhance Cheltenham's natural environment and biodiversity. (*Theme C objectives para 2.9. Cheltenham plan*).
- AONBs are landscapes whose distinctive character and natural beauty are so outstanding that it is in the nation's interest to safeguard them. The statutory purpose of AONB designation is to conserve and enhance their natural beauty. (*Cotswolds AONB Management Plan Chap 1 page 14*).
- Development in the Cotswolds AONB should be based on robust evidence of local need arising from within the AONB. (*Policy CE 12. Cotswolds AONB Management Plan*).

2.2 THE LANDSCAPE.

Reason 2 in consolidated list (Part 1).

The applicant's environmental assessment lists and categorises many adverse impacts on this landscape which are contrary to the following policies.

- Proposals that are likely to impact on, or create change in the landscape of the Cotswolds AONB, should have regard to, be compatible with, and reinforce the landscape character of the location as described by the Cotswolds Conservation Board's Landscape Character Assessment and Landscape Strategy and Guidelines. (*Policy CE1 Cotswolds AONB Management Plan*). The applicant's environmental assessment lists and categorises many adverse impacts on this landscape.
- Because of its attractive character, which derives from its built form as well as the landscape of the scarp edge, and its location on the urban fringe, the AONB in the Borough is particularly sensitive to development pressures. A restrictive approach is therefore necessary to conserve and enhance both of these elements. The Council considers it particularly important to protect the scarp as the dominant feature of Cheltenham's setting and is concerned at the cumulative effect of even small-scale development and of development in new locations within the AONB. (*Cheltenham Plan para 8.3*).
- Development will seek to protect Landscape character for its own intrinsic beauty and for its benefit to economic, environmental, and social well-being.
 - Proposals will have regard to the local distinctiveness and historic character of the different landscapes in the JCS area, drawing, as appropriate, upon **existing** Landscape Character Assessments and the Landscape Character and Sensitivity Analysis. They will be required to demonstrate how the development will protect or enhance landscape character and avoid detrimental effects on types, patterns and features which make a significant contribution to the character, history and setting of a settlement or area. (*JCS Policy SD6*).

The applicants Landscape Assessment acknowledges that the landscape value is high, and that there will be loss of sloping pasture, but it contradicts the Council's Ryder report in many

respects. (See 2.2.1). It attempts to mitigate landscape damage by “retaining vegetation and natural topography” when in fact many of the hedgerows will go, the land will be subject to “cut and fill” and the whole area will be scarred by roads and footpaths.

2.2.1 Landscape Character and Sensitivity Assessment of Cotswolds AONB. (Ryder).

In March 2015, Cheltenham Borough Council commissioned Ryder Landscapes Consultants to undertake a landscape character, sensitivity and capacity study of the Cotswolds AONB and Cheltenham urban fringe as part of its emerging Cheltenham plan.

Oakley Farm Pasture Slopes, where the development is proposed, was specifically included in this study. Extracts from the study and conclusions are as follows:

Landscape Character Area Site Ref: LCA 7.1. Oakley Farm Pasture Slopes:

Visual Sensitivity:

... the views looking from the area are expansive and panoramic, resulting in an overall visual sensitivity of high. i.e. highly sensitive to change brought about by development.

Landscape Character Sensitivity:

... the small to medium scale of the landscape character area, high levels of well-maintained boundary vegetation, sloping topography and views into the area from adjacent residential properties and Harp Hill, the overall landscape sensitivity is assessed as **high**. i.e. highly sensitive to change brought about by development.

Landscape Value:

The landscape character area falls within the designated area known as the Cotswolds AONB, which is a national designation. With the numerous footpaths that exist across the character area, the area has moderate recreational value. With the sloping topography of the landscape the land is particularly visible from residential properties to the south of the area. The visual connections with the escarpment slopes to the northeast of the area are valuable perceptual aspects. The quality of the landscape elements is moderate, with predominantly hedgerow boundaries in good condition. Given the area falls within a nationally recognised AONB designation and taking into consideration the visibility of the site and the generally good condition, the overall value of the landscape character area is assessed as **high**.

The report resulted in overall landscape constraint of **major overall** and a resulting landscape capacity of **low overall**.

To summarise: The site analysis for Oakley Farm Pasture slopes, site ref LCA 7.1 (not to be confused with Oakley Pasture slopes, Site Ref LCA7.3) concluded:

Visual Sensitivity	Landscape Character Sensitivity	Overall Landscape Sensitivity	Landscape Value	Overall Landscape Constraint	Resulting Landscape Capacity
HIGH	HIGH	HIGH	HIGH	MAJOR OVERALL	LOW OVERALL

2.2.2 Cotswolds AONB Landscape and Management Plan. (Cotswold Management Board).

An extract from the Cotswolds AONB Landscape Strategy and Guidelines para 2, under the heading of Landscape Sensitivity, describes the escarpment (of which Oakley Farm Pasture Slopes forms part) as a distinctive and dramatic landscape. The combination of its elevation, and the steep slopes rising from the lowlands, make it a highly visible feature and is therefore very sensitive to change...

2.3 THE CHELTENHAM PLAN AND SALA.

Reason 3 in consolidated list (Part 1).

Oakley Farm Pastures has not been identified as land allocated for development in the Development Plan.

When assessing the suitability for residential development, SALA guidelines state:

Cotswolds AONB: A site may be considered suitable where it is sustainably located and is not in an area of 'high' landscape sensitivity. The council commissioned Ryder Report assesses the landscape character sensitivity level as high.

2.4 ABSENCE OF A FIVE-YEAR HOUSING LAND SUPPLY - EXCEPTIONS TO PRESUMPTION IN FAVOUR OF DEVELOPMENT.

Reason 4 in consolidated list (Part 1).

The absence of a five-year housing supply does not automatically mean permission should be granted. Protected areas such as the AONB can be excluded in recognition of their intrinsic character and beauty, and in the case of Oakley Farm Pasture slopes, there are no exceptional circumstances for consideration. See planning references below.

The presumption in favour of sustainable development:

Plans and decisions should apply a presumption in favour of sustainable development.

For **decision-taking** this means:

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁷ (Note 7 clarifies that this includes situations where the local planning authority cannot demonstrate a five-year supply of deliverable housing sites), granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed (see note 6). or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole.

Note 6: The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 176) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an **Area of Outstanding Natural Beauty**, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 63); and areas at risk of flooding or coastal change.

Note 7: This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five-year supply of deliverable housing sites...

(Extract from NPPF Chapter 2 sub-para 11)

2.5 CHELTENHAM'S SETTING.

Reason 5 in consolidated list (Part 1).

Cheltenham owes much to its setting at the foot of the Cotswold escarpment. The town's eastern fringes include the high-quality scenery of the escarpment, with landscape and woodlands that are designated as part of the Cotswolds. (AONB). (*Cheltenham Plan para 7.1*).

Oakley Farm Pasture Slopes forms an important part of this escarpment and is viewable from parts of Cheltenham town and other areas of the AONB such as Cleeve Common (SSSI – Site of Special Scientific Interest), The Cotswolds Way, and local public footpaths.

- Development should only be permitted where it would not harm the setting of Cheltenham including views into or out of areas of acknowledged importance. (*Policy L1: Landscape and Setting, Cheltenham Plan*).
- The Council considers it particularly important to protect the scarp as the dominant feature of Cheltenham's setting and is concerned at the cumulative effect of even small-scale development and of development in new locations within the AONB. (*Extract Cheltenham Plan para 8.3*).

2.6 GREEN OPEN AREA OF COUNTRYSIDE.

Reason 6 in consolidated list (Part 1).

Although privately owned, and not designated green space, Oakley Farm Pastures are appreciated by people who live in and visit this part of Cheltenham town. The views, variety of trees and wildlife habitats there, are enjoyed by local residents and visitors when walking or driving on Harp Hill or using local public footpaths.

Users currently enjoy views through Oakley Farm Pasture Slopes to the wider AONB escarpment when walking public footpath 86. The site provides an aesthetically pleasing foreground to the stunning Cleeve Common backdrop, an indication as to why it forms part of the Cotswolds AONB. A housing development here would have a significant and detrimental effect on the visual amenity that is enjoyed by many.

Oakley farm pastures would be ideally suited to becoming a non-statutory nature reserve or designated green space. (*Cheltenham Plan para 10.19*).

Cheltenham footpath 86



Current view of Oakley Farm Pasture Slopes (AONB) from Cheltenham footpath 86 - the proposed development site.



2.7 VIEWS FROM OTHER AREAS OF THE AONB.

Reason 7 in consolidated list (Part 1).

- Its attractive setting (Cheltenham) is undoubtedly one of its prime assets and is recognised by the emerging Place Strategy for the Borough as a key factor in helping to achieve sustainable economic growth and securing social wellbeing. The Council

will therefore seek to continue the protection of the town's setting and encourage its future enhancement through sensitively designed / located development. In doing so, the Council is mindful of the need to **protect views** into and out of areas of acknowledged importance such as conservation areas, ancient monuments, sites included on the Register of Historic Parks and Gardens, **sites of specific scientific interest (SSSI), the AONB** and so forth. (*Cheltenham Plan 7.4 and 7.5*).

- Development should only be permitted where it would not harm the setting of Cheltenham **including views into or out of areas of acknowledged importance. (Policy L1: Landscape and Setting, Cheltenham Plan)**.
- Even development close to, but outside, the AONB boundary has the potential to have a detrimental impact on its setting through, for example, **its impact upon key views**, or its impact upon landscape character in and around the AONB boundary. Proposals likely to affect the setting of the AONB must fully consider any potential impacts. (*JCS para 4.7.3*).
- Proposals that are likely to impact on, or create change in, the landscape of the Cotswolds AONB, should have regard to the scenic quality of the location and its setting and ensure that **views – including those into and out of the AONB** – and visual amenity are conserved and enhanced. (*Extract from Policy CE1 Cotswolds AONB Management Plan*).

The applicant attempts to play down the visibility of the site from many significant areas. They describe the lower slopes (qualified as being those areas where development is proposed, when actually this means well over two thirds of the site) as not being visually prominent and therefore justifying a moderate assessment as opposed to high in relation to visual sensitivity. This is contrary to the Council's Ryder report which assesses the sensitivity in all respects as **high**. The applicant also suggests that only views of the uppermost areas of field can be viewed from surrounding areas but as the photograph examples (taken from other areas of AONB) below show, this is not the case.

Some properties on the eastern edge of the site have been mis-identified and mis-assessed in the Environmental Statement as being outside of the AONB which is not the case. Several of these properties are inside the AONB and enjoy near and distant views out into the AONB. Contrary to the applicant's statement, they warrant a high susceptibility experience and a regional value (high) views grading.

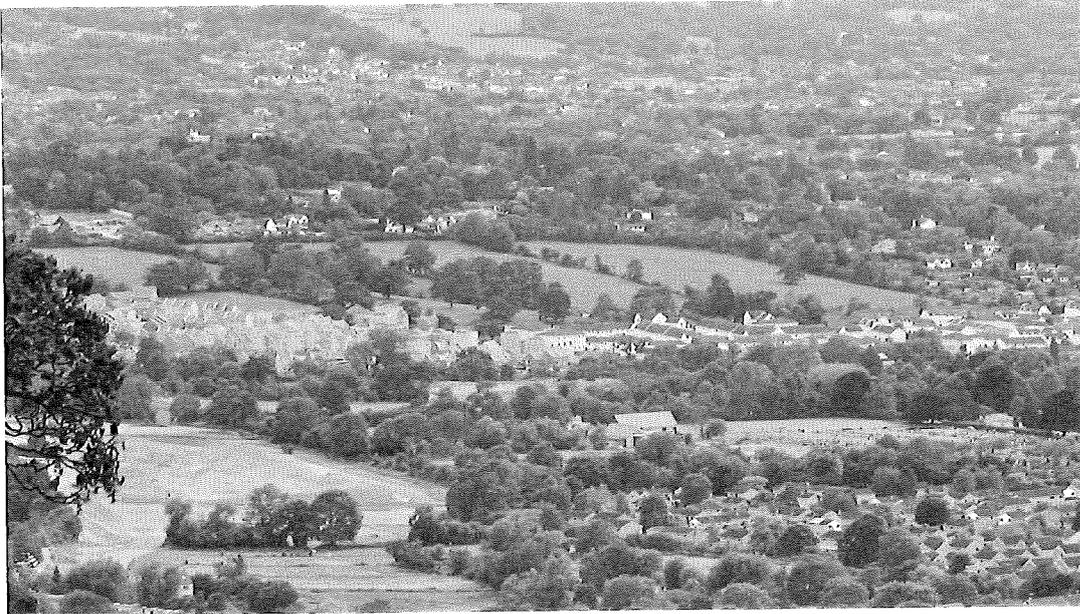
View of Oakley Farm Pasture Slopes from within the AONB - National Trail, 'The Cotswold Way'



View of Oakley Farm Pasture Slopes from within the AONB - Southam Footpath 67



View of Oakley Farm Pasture Slopes from within the AONB - Southam Footpath 67



View of Oakley Farm Pasture Slopes (outlined in red) from within the AONB - Charlton Kings Footpath 12



2.8 SETTING A PRECEDENCE.

Reason 8 in consolidated list (Part 1).

The proposal could set a precedence in relation to erosion of other areas of the Cotswolds escarpment. Oakley Farm Pasture Slopes is marked in red (see photo below). Will the surrounding green areas and escarpment also be at risk?



2.9 TOURISM AND THE SUSTAINABLE ECONOMIC GROWTH OF THE TOWN.

Reason 9 in consolidated list (Part 1).

This particular area of the Cotswold AONB to include Cleeve Common, which is a designated site of specific scientific interest (SSSI), Cheltenham footpath 86, and The Cotswold Way National Trail (which all link in their own way to Oakley Farm Pastures) so close to Cheltenham Town is enjoyed by local people and is a considerable draw to tourists visiting the area and Cheltenham town itself. Organised walks beginning at Winchcombe and ending at Cheltenham are described by companies such as Compass Holidays and Contours Walking Holidays as crossing the grassland of Cleeve Common and Cleeve Hill, the highest point in the area, where visitors can take in some of the best views across the Cotswolds and Severn Vale. Oakley Farm Pastures with its park-like setting forms part of these views. An article in the Daily Telegraph dated 7th June 2020 mentions Cotswold villages which lure tourists in droves but goes on to say that "the real Cotswolds are hills, not hamlets, dominated by the scarp sweeping down the western edge of Gloucestershire". The article continues with "The Cotswold Way leads to numerous eyries affording vistas across the Severn to Wales" These vistas and the scarp include Oakley Farm Pastures. This must be a local amenity few would like to see eroded.

By car, one of the routes to Cleeve Hill for visitors and local people is via Harp Hill (where the proposed access to the development is to be situated). During winter months or when the hedges are low, Harp Hill allows superb views of the Cotswold AONB over Oakley Farm Pasture Slopes.

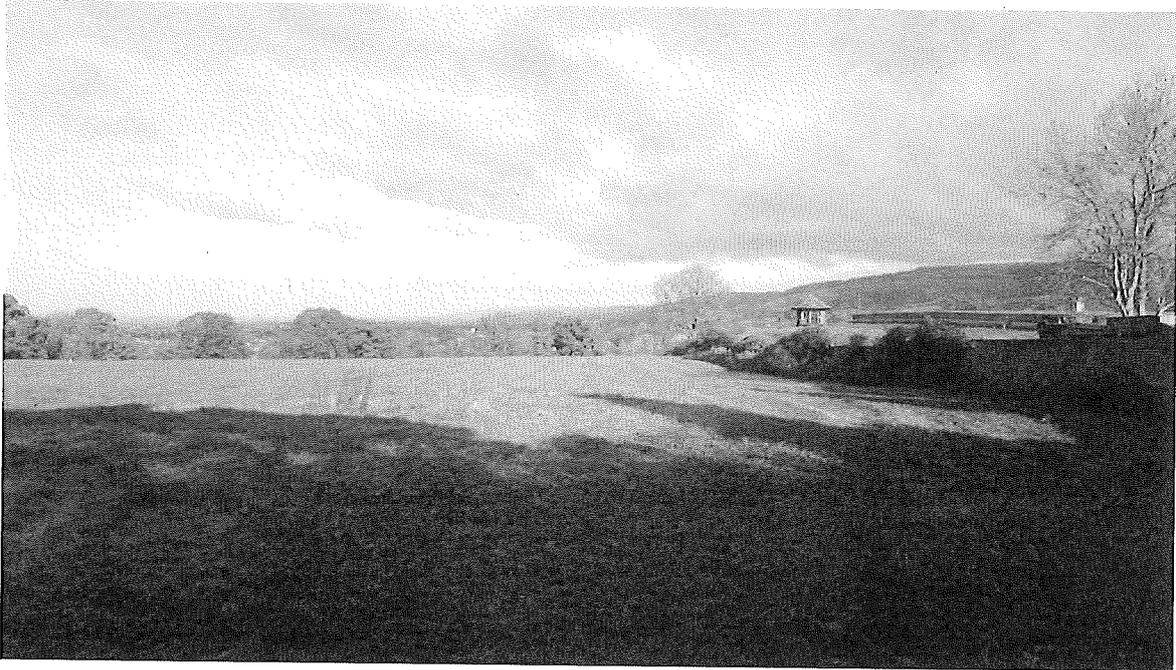
View from Harp Hill looking NE through Oakley Farm Pasture Slopes AONB towards Cleeve Common SSSI, also AONB. Oakley Farm buildings in the middle left.



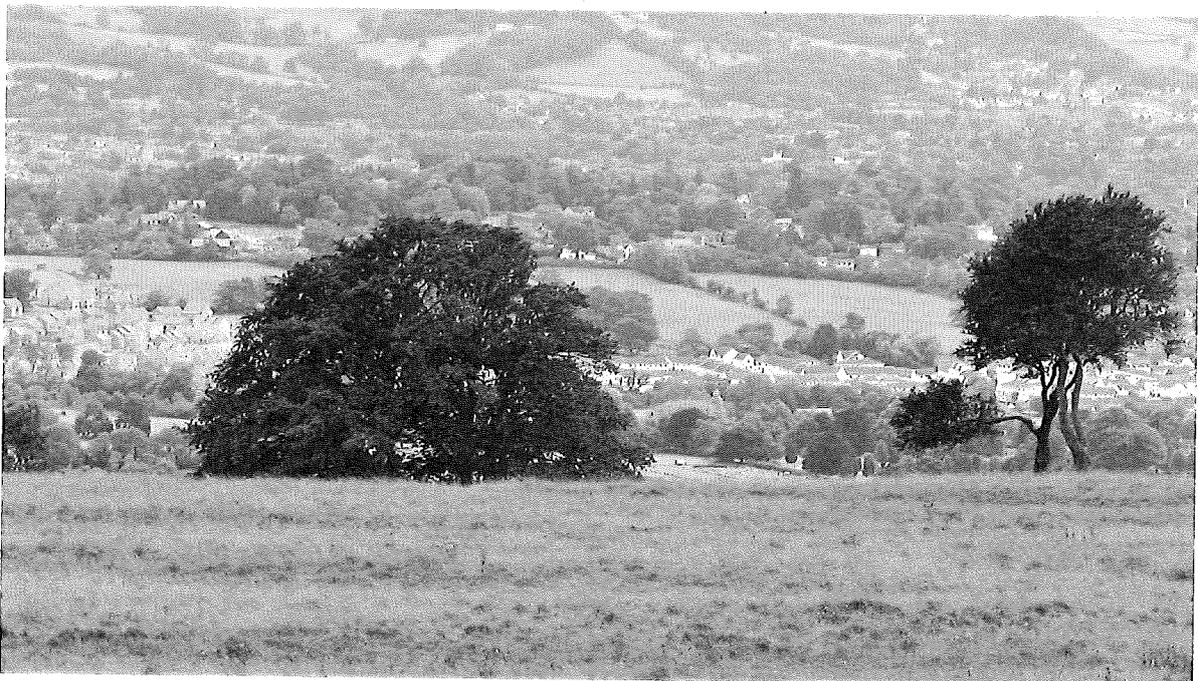
It should be noted that when the site was a working farm, and even for some time after that point, hedgerows were the well-managed, thereby keeping vistas open and drawing the eye to panoramic views from Harp Hill across the fields to the north, of the listed Hewlett's reservoir pavilion, and of the Cotswolds escarpment. Since being sold to the applicant, hedgerows have not been so well-managed and have been allowed to grow and no longer afford such visual pleasure. The presumption is that the developer can claim an enhancement to the landscape by agreeing to cut the boundary hedge, when actually, as a responsible landowner this should be part of normal field maintenance.

- The Cotswolds is a landscape that provides a warm welcome and high-quality experience for everyone. (*Cheltenham Plan para 8.4*).
- AONBs are designated areas where protection is afforded to protect and manage the areas for visitors and local residents. (*Natural England data.gov.uk*).
- Cheltenham is a place where the quality and sustainability of our cultural assets and natural and built environment are valued and recognised locally, nationally, and internationally, and where tourists choose to visit and return. (*Cheltenham Plan para 2.9*).
- Its attractive setting is undoubtedly one of its prime assets and is recognised by the emerging Place Strategy for the Borough as a key factor in helping to achieve sustainable economic growth and securing social wellbeing. The Council will therefore seek to continue the protection of the town's setting and encourage its future enhancement through sensitively designed / located development. In doing so, the Council is mindful of the need to **protect views into and out of areas of acknowledged importance** such as conservation areas, ancient monuments, sites included on the Register of Historic Parks and Gardens, **sites of specific scientific interest (SSSI's) the AONB** and so forth. (*Cheltenham Plan 7.4 and 7.5*).

View from Harp Hill looking north through Oakley Farm Pasture Slopes towards Cleeve Common SSSI and Nottingham Hill. (Grade II listed Pavilion at Hewlett's' Reservoir, can also be seen in the near distance).



View of Oakley Farm Pasture Slopes from within the AONB (from Cleeve Common Memorial Tree).



2.10 TREE AND HEDGEROW DESTRUCTION.

Reason 10 in consolidated list (Part 1).

In addition to being a pleasant feature and providing valuable wildlife habitats, trees have other environmental benefits. They help to reduce the effects of climate change, by absorbing carbon dioxide and other airborne pollutants. On a local scale, trees provide

shade and shelter, reduce noise and stress, encourage inward investment and add economic value. (*Cheltenham plan 16.18*).

Neighbouring residents became alarmed when Oakley Farm Pasture Slopes recently changed hands and trees of considerable maturity were being felled. Almost all of the trees on this land are now subject to a tree preservation order (TPO) but the hedgerows are unprotected, and many will be removed by the developer.

There are a variety of tree species on the pastures to include hawthorn, maple, ash and many oak trees. Some of the latter are veteran or ancient. To lose any more of these trees would be considered by many as tragic.

Views of trees on Oakley Farm Pasture Slopes. Although many of these trees are subject to a TPO, this does not guarantee protection.





2.11 WILDLIFE HABITATS.

Reason 11 in consolidated list (Part 1).

Many wildlife habitats are under severe threat from development and agricultural pressures; even a minor environmental change not requiring planning permission may radically alter the ecological balance and lead to the loss of valuable species. (*Cheltenham Plan 10.3*).

- In addition to the protection and enhancement of areas of particular wildlife and geological significance, the Council is concerned to ensure that other habitats and features are conserved and improved. The Council recognises the contribution that small landscape features such as shrubs and thickets, ponds, meadows and copses can make to the ecology and biodiversity of an area, especially where such features are linked. (*Cheltenham Plan para 10.22*).
- The natural environment within the JCS area includes a wide range of geological and farmed landscapes, green open spaces, and wildlife habitats and ecosystems such as the Severn catchment and **Cotswold escarpment**, which are all recognised for their importance locally, nationally and internationally. (*Joint Core Strategy SD9 4.9.1*).

The Joint Core Strategy recognises the need to protect and conserve **wildlife and habitats**. JCS Policy SD9 highlights the importance of protecting sites from development that would have a harmful effect on their nature conservation and biodiversity interests.

The Gloucestershire Centre for Environmental Records have details of Oakley Farm Pastures wildlife.

Deer on Oakley Farm Pastures.



2.12 TRAFFIC LEVELS.

Reason 12 in consolidated list (Part 1).

In assessing the impacts of a development including any potential harm, the Council will have regard to matters including loss of daylight; loss of outlook; loss of privacy; and potential disturbance from noise, smells, dust, fumes, vibration, glare from artificial lighting, hours of operation, and **traffic / travel patterns. (Cheltenham Plan 14.4).**

- The protection and enhancement of the environment is considered essential in helping to improve the health and wellbeing of Cheltenham. **(Cheltenham Plan 14.1).**
- Highway Issues: Traffic generation, vehicular access and highway safety are all material considerations which are relevant to this site. **(Planning Aid England).**

2.12.1 Traffic.

The road infrastructure around Harp Hill and Priors Road is chronically congested at peak times. Harp Hill itself is dangerously narrow and without footpaths in places. Any additional traffic, as a result of this proposal, will add to these existing serious issues. The proposal presents the possibility of a footpath connection through the site from Priors Rd to its SE corner but unfortunately this would be leading pedestrians to the narrowest and most dangerous section of the Harp Hill road. An alternative route already exists through Oakley Grange and Birdlip road on safe footpaths. The latter connects Priors Rd to the Cheltenham Circular footpath and from there on to the Cotswold way. The applicant's footpath proposal in this regard must be considered as inappropriate.

2.13 HARM TO THE RESIDENTIAL AMENITY OF ADJOINING LAND USERS AND LIVING CONDITIONS IN THE LOCALITY.

Reason 14 in consolidated list (Part 1).

- Development will only be permitted where it would not cause unacceptable harm to the amenity of adjoining land users and living conditions in the locality. (**Policy SL1: Safe and sustainable living - Cheltenham Plan**).
- In assessing the impacts of a development including any potential harm, the Council will have regard to matters including loss of daylight; loss of outlook; loss of privacy; and potential disturbance from noise, smells, dust, fumes, vibration, glare from artificial lighting, hours of operation, and traffic / travel patterns. (**Cheltenham Plan 14.4**).
- Some Material Considerations: Overshadowing/loss of outlook to the detriment of residential amenity. Over-looking and loss of privacy, Highway issues. (**Planning aid England**).

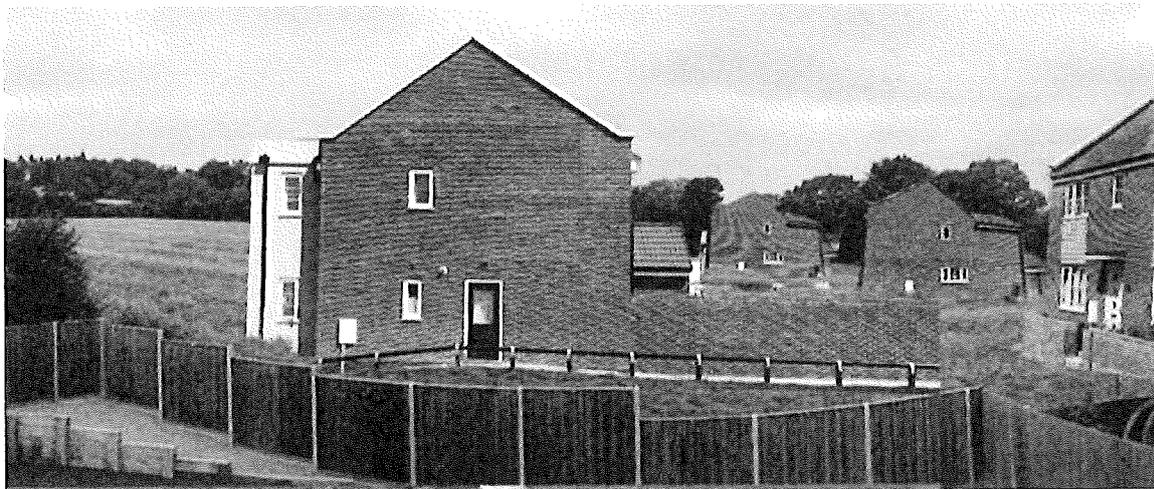
On the current indicative plan, properties on Birdlip Rd would be dominated by the side elevations of large houses which will presumably be “camouflaged” by small slow growing tree which will eventually further compromise the current openness afforded to main living areas and gardens. Some of these properties have their living areas and main family outside space on the first floor. Their outlook and privacy will be severely compromised. It is hoped that the need for conditions is noted **now**, such that in a worst-case scenario, the outlook and privacy of these properties is protected. An independent residential visual assessment should also be sought.

The applicant has under-assessed the effect of the development on those properties closest to the proposal as having “medium” sensitivity and a “medium” magnitude of effect. The significance of effects is also assessed as “moderate adverse” yet when properly considered, they are “**major adverse**”.

Current Outlook from Birdlip Rd.



Impression of outlook from Birdlip Rd gained from indicative plan.



3 PART 3 - CONCLUSION.

Considering the evidence presented, I hope readers of this document will now deem this application for Oakley Farm 'inappropriate development' that will cause great harm, and conclude that the balance should be weighted **in favour of AONB conservation and protection.**

Despite the applicant's claims, building on these slopes, which sit entirely within the AONB, will cause significant adverse impact and irreversible damage to:

- Cheltenham's setting and the local landscape;
- Views of the escarpment;
- Views from other areas of the AONB;
- Wildlife and wildlife habitats; and
- Local infrastructure, local amenity and living conditions.

Additionally, as has been made clear by the mounting number of objections to this planning application (over 270 at time of writing), recent press coverage, the level of correspondence to local councillors, the formation of Friends of Oakley Farm Pastures Group and a community protest, local people are very concerned about the potential loss of this area of the AONB. The views and opinions of local people and their well-being matter.

Housing developments are important but one of the few pleasures people enjoy that is free, is watching wildlife and appreciating local countryside within walking distance of their homes either by taking advantage of public footpaths or from local viewpoints. Local people would like to see Oakley Farm Pasture Slopes retain its AONB protected status for these very reasons.

There are other land options which are less environmentally sensitive and of less national importance. These areas must be exhausted before turning to an AONB.

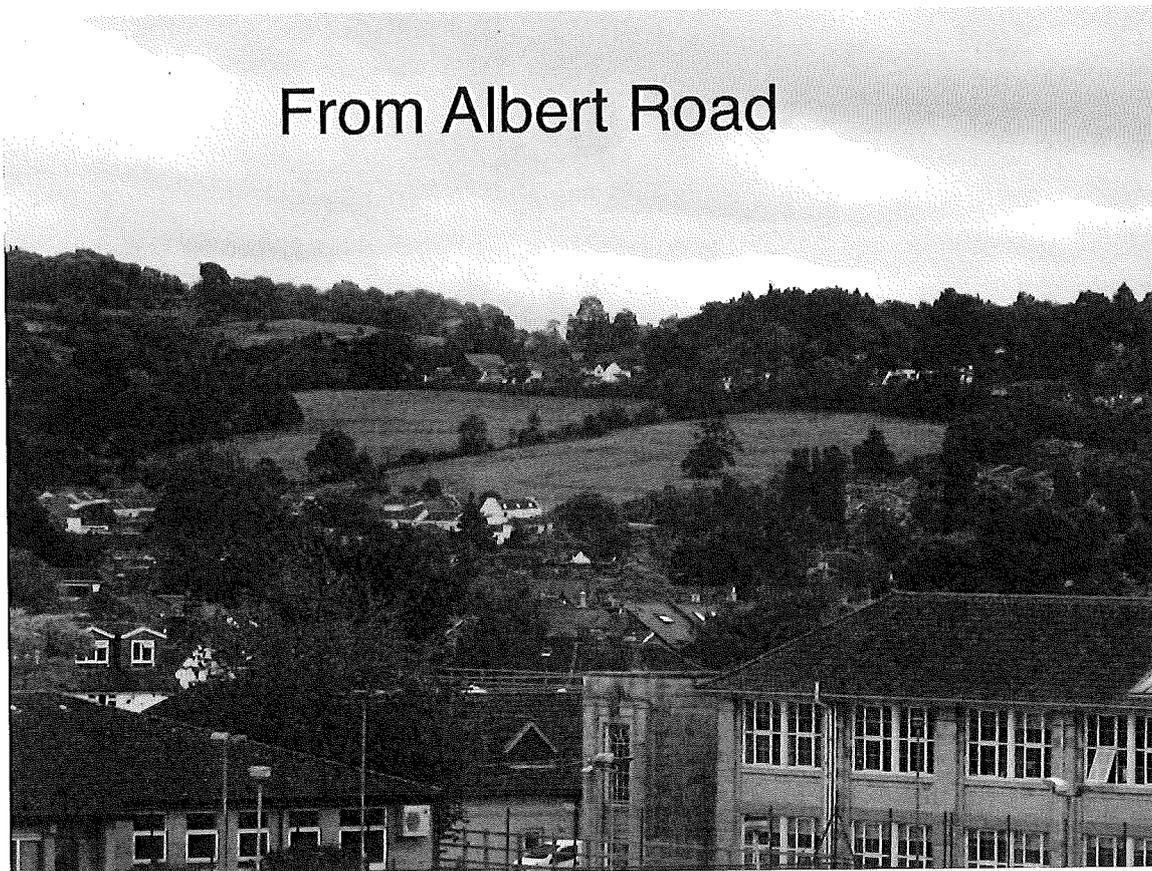
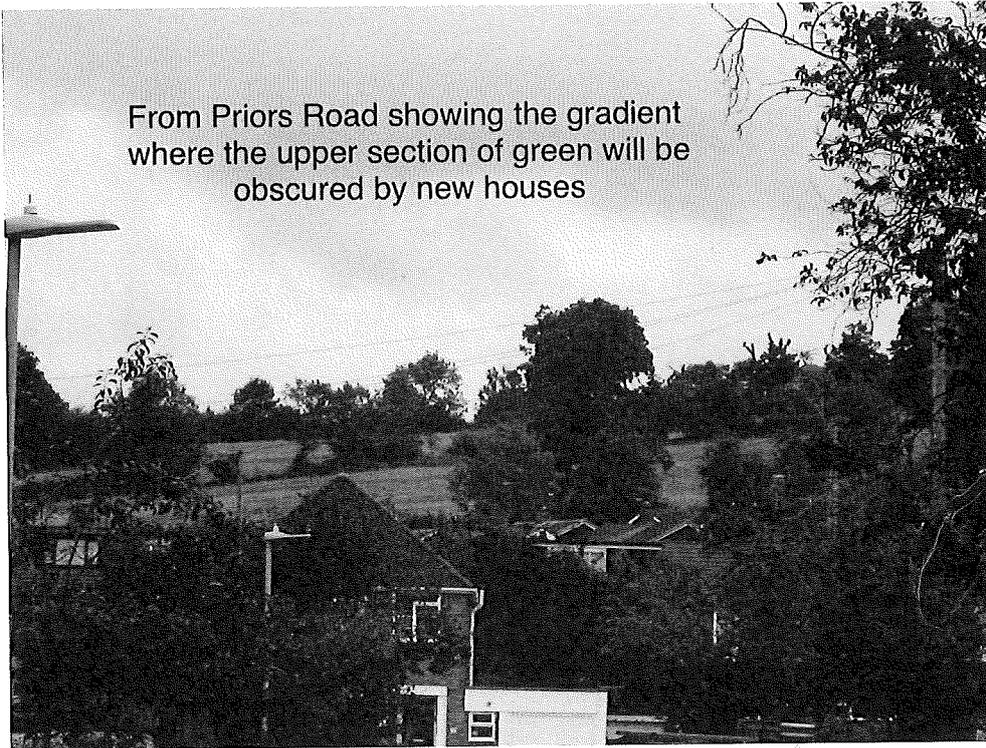
It is hoped that any refusal by the local planning authorities or on appeal would also strongly dissuade the applicant from re-submitting inappropriate amended applications in the future (which would result in considerable cost and effort for all concerned) in this area of the AONB.

3.1 AUTHORS CONTACT DETAILS.

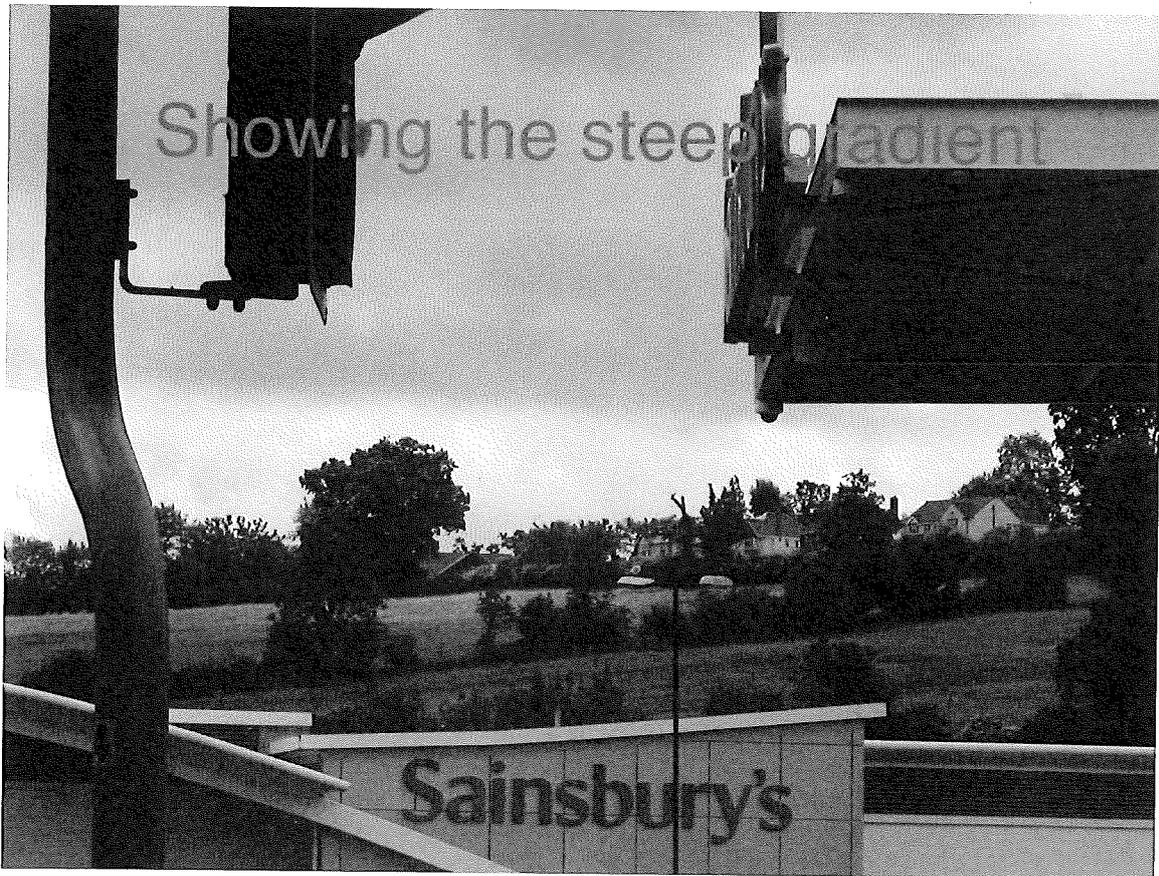
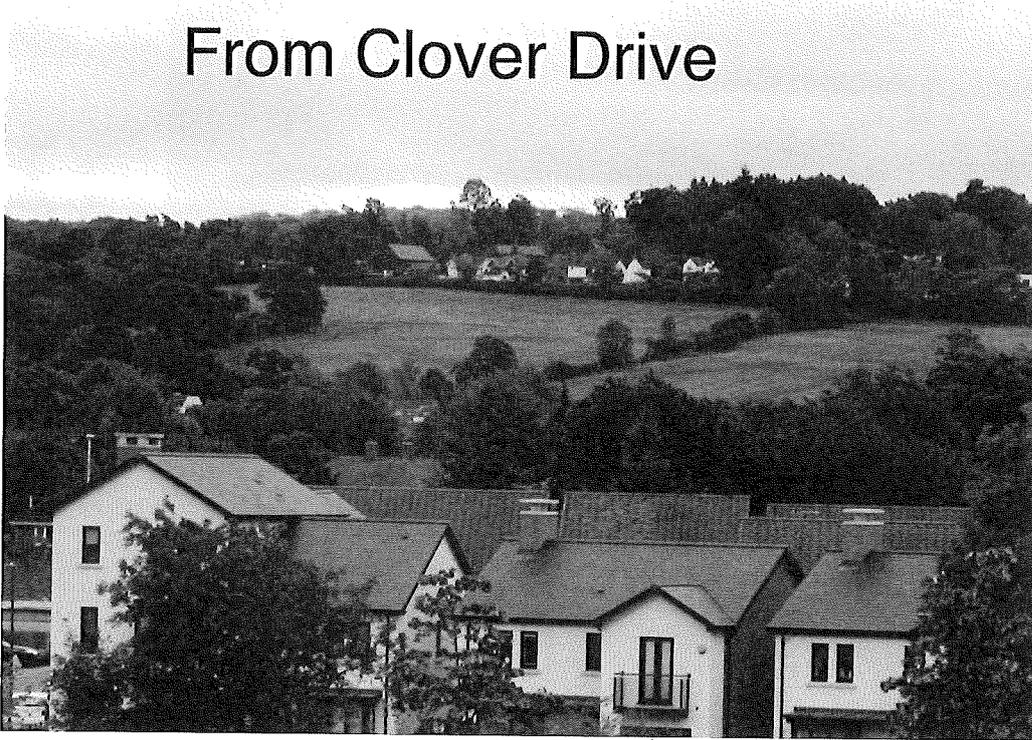
43 Birdlip Rd

Cheltenham.

GL52 5AJ



From Clover Drive





On behalf of Cleavesyde, Harp Hill

DJ planning
Planning & Design Consultancy

FAO Mrs Lucy White, Senior Planning Officer
Cheltenham Borough Council
Municipal Offices
Promenade
Cheltenham

Dear Lucy,

REF: 20/01069/OUT - Outline application for development comprising of up to 250 residential dwellings including provision of associated infrastructure, ancillary facilities, open space and landscaping, demolition of existing buildings and formation of new vehicular access from Harp Hill. All matters reserved except for means of access to site from Harp Hill - Oakley Farm Priors Road Cheltenham Gloucestershire GL52 5AQ

An application has been made by Robert Hitchens Limited for outline planning permission for a development within the Cotswolds Area of Outstanding Natural Beauty (AONB) comprising up to 250 residential dwellings on land at Oakley Farm served by a new access from Harp Hill.

The application has been made in outline with all matters reserved except access. However, the applicants have acknowledged that the Grade II reservoir structures are a potential constraint to development. They have also made much of the argument about developing the lower slopes/section of the site, placed a strong emphasis on the landscape scheme prepared in support of the development and on the contribution 250 houses would make towards Cheltenham's housing shortage. As such, although the application indicates that the plans are 'illustrative' it is clear that these plans essentially represent the intended housing estate layout and landscaping and therefore should be considered carefully in the assessment of the application.

The following objection is lodged on behalf of my clients, ~~Mr and Mrs [redacted]~~, who reside at Cleavesyde, Harp Hill which is located immediately opposite the proposed new access to the residential estate and which, along with a great number of other dwellings on Harp Hill and surrounding residential roads, will be most directly and adversely affected by this development. The objections lodged by the Cotswold Conservation Board and Friends of Oakley Farm Pasture Slopes are fully supported.

There is no disputing the fact that the proposal constitutes 'major development' within the terms of paragraph 172 (Section 15 - Conserving & enhancing the Natural Environment) of the National Planning Policy Framework (NPPF) by virtue of its nature, scale and setting and having regard to the significant adverse impact it could have on the purposes for which the area has been designated or defined (See Footnote 55 to paragraph 172).

The Council's Landscape Character and Sensitivity Assessment (May 2016) (LCSA) undertaken by Ryder Landscape Consultants - a Landscape Character, Sensitivity and Capacity Study of the Cotswold AONB and Cheltenham Urban Fringe, undertaken as part of the Cheltenham Plan (recently adopted) to assess the landscape character and sensitivity of the landscape, the visual amenity and the value and potential capacity to accommodate new development in the AONB, determined in relation to the Oakley Farm Pasture Slopes character area (the application site): The Visual Sensitivity of the character area to be **High**; The Landscape Character Sensitivity of the character area to be **High**; The Landscape Value of the character area to be **High**. The Overall Landscape Sensitivity to be **HIGH** with the Overall Landscape Constraint identified as **MAJOR OVERALL**. The Overall Landscape Capacity i.e. the capacity of the character area to accommodate further development is identified as **LOW OVERALL**. Any development, even of a small scale nature let alone a development of 250 houses, is therefore likely to have a significant adverse impact on the AONB.

The first part of **Paragraph 172 of the NPPF** applies to development generally within these designated areas and provides as follows:

'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads⁵⁴. The scale and extent of development within these designated areas should be limited.'

The second part of paragraph 172 applies solely to "major development" and states that the development control policy applicable to major development in an AONB is that:

'Planning permission should be refused for major development⁵⁵ other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.'*

Thus paragraph 172 states quite clearly that development in the AONB should be limited and, where major development is concerned, **refused except in exceptional circumstances and where it can be demonstrated that the development is in the public interest.**

The planning statement accompanying the application acknowledges that exceptional circumstances are required to outweigh the 'great weight' to be given to conserving and enhancing the landscape and scenic beauty of the AONB. The arguments submitted on behalf of Robert Hitchins Ltd in support of the proposal firstly, suggest that the development of 250 houses on this site will conserve the character of the site and enhance its landscape essentially by taking issue with and disagreeing with the findings of the Council's Landscape character, Sensitivity and Capacity Study (LCSA) undertaken by Ryder Landscape Consultants in respect of this particular site; secondly, by claiming that exceptional circumstances exist to allow this major development within the AONB; and thirdly, by arguing that the titled balance of NPPF policy 11(d) should be applied.

In respect of the second point, it seems clear from reviewing the documents submitted with the application that the 'exceptional circumstances' relied on to justify this development in the AONB amount to:

- the housing shortfall and the contribution to meeting Cheltenham's housing need;
- improving accessibility to the site and AONB countryside, providing a new open space with new views and enhanced views for those, like my clients, that live on Harp Hill directly overlooking the site; and
- an enhancement in biodiversity.

I, on behalf of my clients, take issue with and strongly dispute all the arguments put forward.

The premise for the proposed development as put forward is fundamentally flawed and, if accepted, would undermine the LCSA of the Cotswolds AONB within the Cheltenham administrative area not only for this site but for any other site within Cheltenham's AONB and would thus threaten the long term protection of the AONB and its special qualities which are recognised nationally of great importance.

The assertion that the LCSA of Cheltenham's AONB has taken a too 'broader' approach to the assessment of the areas within the AONB rendering its findings less than useful is, quite frankly, absurd. The developers are clutching at straws! The LCSA considered the physical influences and natural factors, human influences and cultural factors, views, quality and condition of landscape and component features, aesthetics and perceptual qualities in each of, no less than, 42 land parcels falling within an area of the Cotswolds AONB Landscape Character Type 2: Escarpment, Landscape Character Area 2C Escarpment: Copper's Hill to Winchcombe, based on both desk top and field surveys. The field surveys considered national, regional and local designations along with 11 other criteria - Landscape quality (condition), Rarity, Representativeness, Recreation value, Perceptual aspects, Tranquillity, Remoteness, Wildness, Scenic beauty, Cultural associations, and Conservation interests to determine the 'value' of each site. This methodology certainly doesn't suggest the 'broad brush' approach suggested by the applicant's consultants.

The applicant further seeks to discredit the LCSA on the basis that it concluded that there were 'Major Landscape Constraints' and a 'Low Capacity' for built development in all 42 areas studied. They fail to acknowledge, however, that the LCSA did identify that in 4 of the 42 areas there is some limited capacity for built development along the urban edge of Cheltenham that would have less impact on the landscape character and, with robust mitigation, could accommodate appropriate development. The LCSA did not however consider the application site, Oakley Farm Pasture Slopes, as falling into this category or being capable of accommodating change through development even with robust mitigation.

The main characteristic of the character area, as its name suggests, is the openness of the sloping pastoral farmland, comprising small to medium sized fields with its mature parkland setting, trees (including veteran trees of significance) and hedgerow boundaries. A development which sees 2/3rd of this character area developed with houses and the remaining 'finger' of land dissected by an estate road serving 250 houses would clearly compromise that open pastoral character. The submission made on behalf of the applicant itself acknowledges that there would be harm through the permanent loss of open pasture.

The LCSA considers the site to have 'High' Landscape Sensitivity unable to accommodate change caused by development; of high quality with distinctive elements and features making a positive contribution to the character and sense of place. It is further considered to have a 'High' Visual Sensitivity with long distance viewing opportunities including visual receptors with a particular interest in their surroundings or prolonged viewing opportunities.

The views from the area are defined in the LSCA as being expansive and panoramic looking across Cheltenham and the escarpment slopes of the Cotswold AONB with views being generally uninterrupted with the exception of intermittent trees within the boundary hedgerows. The elevated and sloping nature of the site also means that the site is highly exposed within both near and long views. In open, long distant views gained from recognised footpaths in the immediate locality and from the Cotswold Way National Trail the site forms a significant green wedge which informs the landscape setting of the settled landscape. These views are abundantly clear and well documented in a series of photographs provided by both the Cotswold Conservation Board and Friends of Oakley Farm Pasture Slopes. In respect of the views enjoyed by my clients, Mr and Mrs Fry, and others resident in the houses immediately south of the application site, atop the elevated topography, the LSCA notes that views over the character area (Oakley Farm Pasture Slopes) are expansive.

The proposed development would see the green wedge and the landscape setting of the surrounding settled area diminished to an inconsequential 'finger'. The proposed development, even limited to the bottom 2/3rd of the site will be visually intrusive from all viewing points. Post-development views from within the site, from either the new houses or the slither of land left open at the top of the site, will be curtailed – From the open land by the proposed new tree planting and from the proposed new houses, given the proposed slope remodelling, by the roofs and structures of other new houses.

The views from my clients' house and others immediately south of the site will again be curtailed, diminished and denigrated, cut off by new tree planting screening what would be a large housing estate. To suggest that the development of the new Oakley Grange site is a 'prominent visual detractor' in views from Harp Hill and that developing 2/3rd of the proposed site with houses, planting a band of trees, and creating a new estate road serving 250 houses opposite my clients' house will improve views is clearly a ridiculous argument that cannot be substantiated. In fact, the view from my clients' house and others immediately around it will be very much dominated by the comings and goings of the huge number of cars and the traffic likely to be generated by the development. The tranquillity of the area, another element of the character of the AONB, will be lost as a consequence of the new access and the noise of the additional traffic. Worse still, the location of the site access and the sloping topography of the site at this point will result in the enjoyment of my clients' house and their residential amenity being significantly marred by light pollution arising, in the evenings, from the headlights of cars leaving the estate shining directly up into the habitable room windows of their house.

It is clear that the findings of the LSCA and the landscape character and sensitivity of the Oakley Farm Pasture Slopes is not conducive to or supportive of any residential development of the site without harming its innate and intrinsic character. It is not surprising therefore that Robert Hitchins Ltd want to ignore it. On spurious grounds they wish to dismiss Ryder Landscape Consultants' LCSA, which informed the recently adopted Cheltenham Plan process, and undertake their own assessment of the site, in isolation from the wider AONB, in an attempt to justify development.

The applicant's assessment unsurprisingly overemphasises the impact of surrounding development on the rural character of the site and the benefits arising from the development. The submission states that the site's 'character is significantly degraded by the adjoining urban edges to the west and particularly the north' and that it is cut off from the wider countryside. However, the extent of development around the site remains much as it did when it was designated AONB initially in 1966 and then later through the AONB boundary extension which took in the westernmost part of the site. Furthermore, residential development on Harp Hill at the southern side of the site which includes my clients' house, is much less dense than the more recent residential development on the former GCHQ Oakley site and is more characteristic of its position on the periphery of the town giving way to a more rural landscape. The difference between the housing to the north/northeast and the housing along the southern boundary of the site along Harp Hill can be clearly appreciated from the site plan submitted with the application. It is also clear from the photographs submitted by the Cotswold Conservation Board and the Friends of Oakley Farm Pasture Slopes that the site is currently viewed and perceived within the wider AONB landscape of which it forms a part. Even with a tree belt, the proposal would be viewed as a significant expansion of the more densely developed urban settlement into the countryside.

Therefore, contrary to the claims made in the supporting statements submitted with the application, 'limiting development to the lower sloping areas adjoining the farmstead and ensuring that the upper slopes remain free of built form' *would not* retain the rural and green wedge character that contributes to the setting of Cheltenham as experienced in present views.

Regard must be given to the purposes of the AONB and, in particular, the advice in paragraph 172 of the Framework which states that great weight should be given to conserving and enhancing landscape and scenic beauty within such areas. It is clear that the proposed development, which is visually intrusive and would adversely affect the character and appearance of the area and the scenic beauty of the AONB, as identified and detailed in the LCSA, would give rise to significant harm and, as major development within the AONB, should be refused planning permission.

The applicant's consultants claim that there are exceptional circumstances and that development of the site would be in the public interest. The housing shortfall and the provision of housing, including both affordable housing and open market housing, to meet Cheltenham's housing need is promoted as the principal public benefit that would be generated by the scheme.

The redevelopment of the former GCHQ Oakley site has seen considerable housing development in the area in recent years including the development of affordable housing. Paragraph 6.5 of the applicant's planning statement states that the application proposes 'a policy compliant level of affordable housing i.e. 40%'. As such, the provision of affordable housing within the development would not be considered exceptional and therefore that the level of affordable housing provision could not be treated as an exceptional circumstance.

The 'tilted balance' set out in paragraph 11 of the NPPF does not apply to the consideration of whether exceptional circumstances exist with regard to paragraph 172 (Please refer to Planning Appeal Reference: APP/K1128/W/18/3208541- March 2019). The Council's shortfall in the 5-year supply of housing does not in itself amount to an exceptional circumstance. Although it is acknowledged that Cheltenham is generally constrained by AONB and Green Belt designations it is not the case that this site, which lies outside the town's Principal Urban Area and within the AONB, is the only site capable of delivering housing to meet housing needs. It is clear that, working with neighbouring administrative authorities, there is scope for housing development within less sensitive locations. Furthermore, it is noted that the LCSA identified that there are other areas of

the AONB within Cheltenham's administrative area which are capable of accommodating some limited development which would have less impact on the landscape character of the area. In this context, whilst the provision of housing on the site would serve a general need, and therefore provide a general public benefit, this would not in itself demonstrate the existence of exceptional circumstances.

The applicant suggests that improving accessibility to the site, providing new open space and improved access to the AONB countryside with new views, including those of the adjacent Grade II reservoirs would amount to exceptional circumstances. However, given the location of the site, the sloping topography, the dissection of the proposed open space by the estate road serving 250 houses and the limited views which could be gained out of the area as a consequence of the substantial tree planting belt, it is considered that any public benefit offered in this respect would be minimal, especially when weighed against the landscape harm arising from the development previously described. The open space provided at the top of the site serves rather to preserve the setting of the adjacent Grade II reservoirs. Both the proposed open space and public access to it is more appropriately viewed as mitigation against the landscape harm caused by the development rather than an exceptional circumstance.

The submission further suggests that biodiversity enhancements, the strengthening and revitalising the green infrastructure network amounts to an exceptional circumstance. It is clear from the reports submitted with the application that the site currently supports considerable wildlife. The expansion of towns and cities into such peripheral areas is putting the natural habitats of wild animals increasingly under threat. Bats in particular are vulnerable to development due in part to their sensitivity to habitat interference. There are 16 species of bat which are currently known to breed within the British Isles. All of these species have been subject to population declines to differing levels and are subject to high levels of legal protection to benefit their conservation. The South West is especially important for bats as all 16 species can be found here, including both species of horseshoe bat which are subject to much targeted conservation work due to their restricted range and significant declines over the past 100 years.

The ecology study submitted with the application identifies use of the site by 7 species of bat, 14 trees with features suitable to support roosting bats and high numbers of bats using the site at the height of seasonal activity. These factors tend to suggest that the wider ecosystem is healthy and capable of supporting a wide range of wildlife. The Environmental Statement acknowledges that the impact on bats would be considered 'adverse' prior to mitigation. The range of species detected on the site is however somewhat played down within the supporting text. Furthermore, it is noted that an aerial tree climbing survey was undertaken of only 6 of the 14 trees identified as having features capable of supporting bat roosts and that this survey was undertaken in June, which is very early in the season. It is during the autumn/winter months that bats select roosting sites suitable for hibernation. The surveys undertaken would therefore seem to be inadequate for assessment purposes. It should be noted that bats are relatively long-lived creatures, with some British bats known to have lived in excess of 30 years. Their roosting and foraging habitats are often used year after year and can be extremely important for a given local population. Although, the proposals include retention of many of the trees and the majority of existing hedgerows, the development of 2/3rd of the site with 250 houses, including development in close proximity to these trees and in areas of the site where high bat numbers were recorded, the construction process and the introduction of street/night lighting and other aspects of the human environment would, in all likelihood, prove unhealthy for the bat populations using and in all likelihood roosting within the site.

The application proposes biodiversity enhancements. However, the biodiversity enhancements and the strengthening and revitalisation of the green infrastructure across the site could equally be achieved within the context of the site in its current use. There is nothing to stop the restoration of the hedge field boundaries throughout the site, further trees and hedges being planted, and improved management of existing hedges around the site taking place. Again, the proposal to enhance biodiversity across the site is primarily offered as mitigation against the harm caused by the development. The development is not necessary to deliver biodiversity enhancements. Certainly, the proposals do not amount to exceptional circumstances and threats about the likely further neglect of the site in the absence of housing development do not change that fact.

It is clear that the proposal constitutes major development that would harm the landscape character of the AONB and, in the absence of any exceptional circumstances, should be refused planning permission in accordance with paragraph 127 of the NPPF.

It is acknowledged that at the heart of the NPPF is a presumption in favour of sustainable development. Paragraph 11 states that 'Plans and decisions should apply a presumption in favour of sustainable development'. At paragraph 11d) it makes clear that for decision-taking this means 'where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁷, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed⁶; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.'

Footnote 7 does state that, for applications involving the provision of housing, this includes situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites.

However, footnote 6 to paragraph 11d)i. states that the policies referred to are those in the Framework (rather than those in development plans) and include those relating to sites designated as an AONB.

The adverse impact of the proposed development on the AONB provides a clear reason for refusal in this case. As such, in accordance with recent case law and appeal decisions, the 'tilted balance' set out at paragraph 11 and referred to in the applicants planning statement does not apply. The fact that the Council cannot demonstrate a 5-year supply of deliverable housing sites is not therefore relevant in this case. Even if it were it seems clear that the adverse impacts of the development would clearly and significantly outweigh the benefits.

The case against the proposed development has been clearly made paying particular regard to the landscape character and ecology of this AONB site. The adverse impact of the development on my clients', ~~Mrs M. M. M. M.~~ home on Harp Hill has also been highlighted. The loss of expansive views over the landscape character area, the loss of tranquillity, the noise from traffic generated by the development and light pollution from cars using the proposed site access which lies directly opposite ~~Mrs M. M. M. M.~~ house have all been cited.

This letter has not however touched on the impact of the traffic generated by the proposed development on the road network surrounding the site and on Harp Hill which would be the road most affected by the development. It is understood that ~~Mrs M. M. M. M.~~ has commissioned highways transport consultants to review and comment on this aspect of the development separately. However, it seems quite clear that Harp Hill, which is narrow and subject to on road parking for a significant section of its lower slopes close to the junction with Hales/Priors and Hewlett Roads would be unable to accommodate the

likely traffic generated by the development. Minor alterations to the road alignment at the double roundabout would not, it is considered, sufficiently reduce the long traffic queues anticipated on Harp Hill post development. It seems more likely that at peak hours traffic in the immediate area and on Harp Hill will come to a grinding halt.

In conclusion, it is clear that the proposed development does not meet national policy in the form of the NPPF. It is contrary to the policies of the development plan, the JCS and recently adopted Cheltenham Plan which are most important in the determination of the application, namely those that seek to protect the natural beauty, character or special quality of the AONB and conserve the its landscape character. These policies are in accordance with national policy and considered to be up-to-date. There is a clear reason for refusing permission for the proposal on the grounds of harm caused to the AONB with no legitimate exceptional circumstances put forward by the applicant. In such circumstances, the fact that Cheltenham has a housing shortfall and is unable to demonstrate a 5 year supply of housing and that, as such, the housing policy is considered to be out-of-date does not, in this instance, trigger the 'tilted balance' as has been determined by recent planning case law. Claims to the contrary made by the applicant should be dismissed.

Yours sincerely
Diana Jones MRTPI
DJ Planning

Bredala's Tun,
Ashley Road.

I am deeply connected to the beautiful countryside to which I came at five years old and where my children were also raised. Along with many friends and neighbours I am passionate about maintaining the integrity of this lovely countryside which is part of the AONB. I strongly object to this application and concur with all of the well-documented comments which are online. In particular the objection made by the residents of Haytor is extremely well documented and researched and is in my mind entirely compelling.

- The site is outside of the PUA - it is within the AONB and is therefore not part of the Town Plan. To build here would contravene very robust national and local policies.
- Cheltenham has precious little AONB on its fringes - that which we do have we should value and protect.
- The proposals would lead to both adverse landscape and visual change in the local area. This is in conflict with JCS Policy SD7 as it neither 'conserves' or 'enhances' the natural beauty of this nationally designated area and it is also at odds with the objectives of the Cotswold AONB Management Plan.
- Views in and out of the AONB should be protected.
- I believe that to build here would only exacerbate what seems to already be quite a serious flooding problem for the houses and roads below after heavy rain.
- The junctions at the bottom of Harp Hill and at Sixways in Greenway Lane are already extreme bottlenecks at certain times of the day. Greenway Lane and Harp Hill are after all just country lanes which have had to absorb ever increasing amounts of traffic - they are already being used as a rat run by many - and it's impossible to imagine that an increase of another 500 plus cars which might go back and forth several times a day could even be considered a viable option. Not to mention all the delivery and service vehicles - as well as emergency vehicles such as fire and ambulance. It would be a huge misjudgement to imagine that this development wouldn't make many people's lives a misery and turn what is still a gorgeous rural area into a nightmare whenever we set out from our homes either on foot or by car.
- Cheltenham was recently voted the best place to live in the south west and it is crucial that the right approach is made in planning and preserving the very best of it. The pandemic and consequent lockdown have underlined what has become most important to many of us - hordes of runners, cyclists, horse-riders, families and children with dogs in tow have taken to these roads - and the PROWs - like never before. There are very few roads which lead up to the very popular beauty spot of Cleeve Hill and this is one of them, and Greenway Lane another.
- With so many shops closing down due to the economic fallout from the pandemic Cheltenham's lure as a thriving shopping centre will in the future become less and less important, whereas the natural beauty of its surroundings and it's designation as The Heart of The Cotswolds' will be more relevant than ever.
- Indeed the latest government proposals regarding planning and development make it clear that AONB will be classified as protected and as such will not be made available for development in order to prioritise building on brownfield sites and sites which are on the Town Plan - both less controversial.

There is an abundance of wildlife and all manner of birds and animals coexist here and can often be seen going about their business in broad daylight. It is imperative that we keep the natural wildlife pathways open for them to move around unrestricted and to protect their natural habitat.

The peace and beauty of this rural location is a valuable asset to Cheltenham and I for one fervently believe that we have a huge responsibility to preserve this legacy for future generations and their children to enjoy and we should not let the need for new affordable housing take priority over protecting the countryside.

~~Wendy Williams~~

Baedala's Tun
Ashley Road
GL52 6PJ

Oakley Farm Planning Objection 20/01069/OUT



Friends of Oakley Farm
Pasture Slopes



www.oakleyfarmpastures.wixsite.com/oakley

Friends of Oakley Farm Pasture Slopes (FOFPS) is a local campaign group established in 2019 when the applicant made preliminary enquiries to build on this land. We represent the views of our many local supporters who are against inappropriate development of land that forms part of the Cotswolds Area of Outstanding Natural Beauty (AONB).

We object to this development proposal for Oakley Farm, which lies in the Cotswolds AONB.

Introduction

An AONB is an area with statutory national landscape designation, the primary purpose of which is to conserve and enhance natural beauty. This development proposal would conflict with this purpose. Together with National Parks, AONBs represent the nation's finest landscapes and should be afforded the highest level of protection.

Section 85 of the Countryside and Rights of Way Act 2000 (CROW Act) states: "In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."

Para. 15 of the National Planning Policy Framework (NPPF) states: "The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings."

Together with the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy the recently adopted Cheltenham Plan 2020 comprise the statutory development plan for Cheltenham up to 2031.

Section 1.4 of the recently adopted Cheltenham Plan states: "In a plan-led system, the development plan and neighbourhood plans set out the overarching context and specific policies that are used to manage and guide development through the decisions the Council makes on planning applications. The development plan also sets out higher-level objectives and aspirations that aim both to conserve what is valued and cherished within Cheltenham and to encourage development in spatial and policy areas the Council wishes to promote in the public interest."

Also from the Cheltenham Plan, para. 2.9 (Vision Theme C) includes objective (b) as follows: "Conserve, manage and enhance Cheltenham's natural environment and biodiversity, including its parks and gardens, its trees and green spaces, its countryside, and the Cotswolds Area of Outstanding Natural Beauty."

Views of the Cotswold escarpment from the lower level are a recognised 'Special Quality' of Cheltenham and this proposal would significantly change the character of this section of the Cotswolds AONB. As noted in para. 8.3 of the Cheltenham Plan:

“Because of its attractive character, which derives from its built form as well as the landscape of the scarp edge, and its location on the urban fringe, the AONB in the Borough is particularly sensitive to development pressures. A restrictive approach is therefore necessary to conserve and enhance both of these elements. The Council considers it particularly important to protect the scarp as the dominant feature of Cheltenham’s setting and is concerned at the cumulative effect of even small-scale development and of development in new locations within the AONB.”

The policies and legislation referred to above emphasise the importance of protected land to our landscape, visual amenity, community and wellbeing. They also reinforce the incumbent responsibility on our decision-makers to exercise the utmost care and consideration when considering development proposals in relation to such areas of land.

Oakley Farm Setting

This area of land on the urban edge of Cheltenham falls within Landscape Character Area 2D (Cooper’s Hill to Winchcombe) and therefore has the assignment of Landscape Character Type 2 – Escarpment as assessed in the Cotswolds AONB Landscape Strategy and Guidelines (June 2016). It was designated as an AONB in 1966 and further extended in 1990. A key view of the dramatic scarp to the edge of Cleeve Common Site of Special Scientific Interest (SSSI) was, until recently, afforded through the site from the adjoining Harp Hill road. Extended views were also available to Nottingham Hill, Oxenton Hill and Bredon Hill, all points within the Cotswolds AONB. However, the owners of the site have adopted a policy of allowing the boundary hedge to grow vertically uncontained, thereby hiding from the public these treasured views. From several locations, views into the site offer a parkland setting, with fields bounded by established hedgerows and veteran and ancient broad leaf trees. Several points around the site offer valued, distinctive, panoramic and pleasant views both into and through the site. The proposed development would have a significant and detrimental visual impact on these views between the interconnected areas of the AONB as well as into and through the AONB.

Cotswolds AONB

One of the core planning principles of the NPPF is contained within para. 170, which sets out that the planning system should recognise the intrinsic character and beauty of the countryside and should contribute to and enhance the local environment by protecting and enhancing valued landscapes. The proposed development would have a severe and adverse impact on this natural environment and its visual local aesthetic value and attractiveness. The quality alone of this deep and wide-open landscape is reasoned justification for protection in its own right, however, it also provides a complementary and unrestricted foreground to expansive near and distant views into both the Cotswolds AONB and Malvern Hills AONB.

Land to the west, south, north and northeast is now residential, however, this is no justification for the site’s development. In 1966 the area was designated AONB and reconfirmed and expanded in 1990 when, even at the time, the large-scale

multistorey mass of the structures and buildings of the GCHQ site were present where the new housing units now sit.

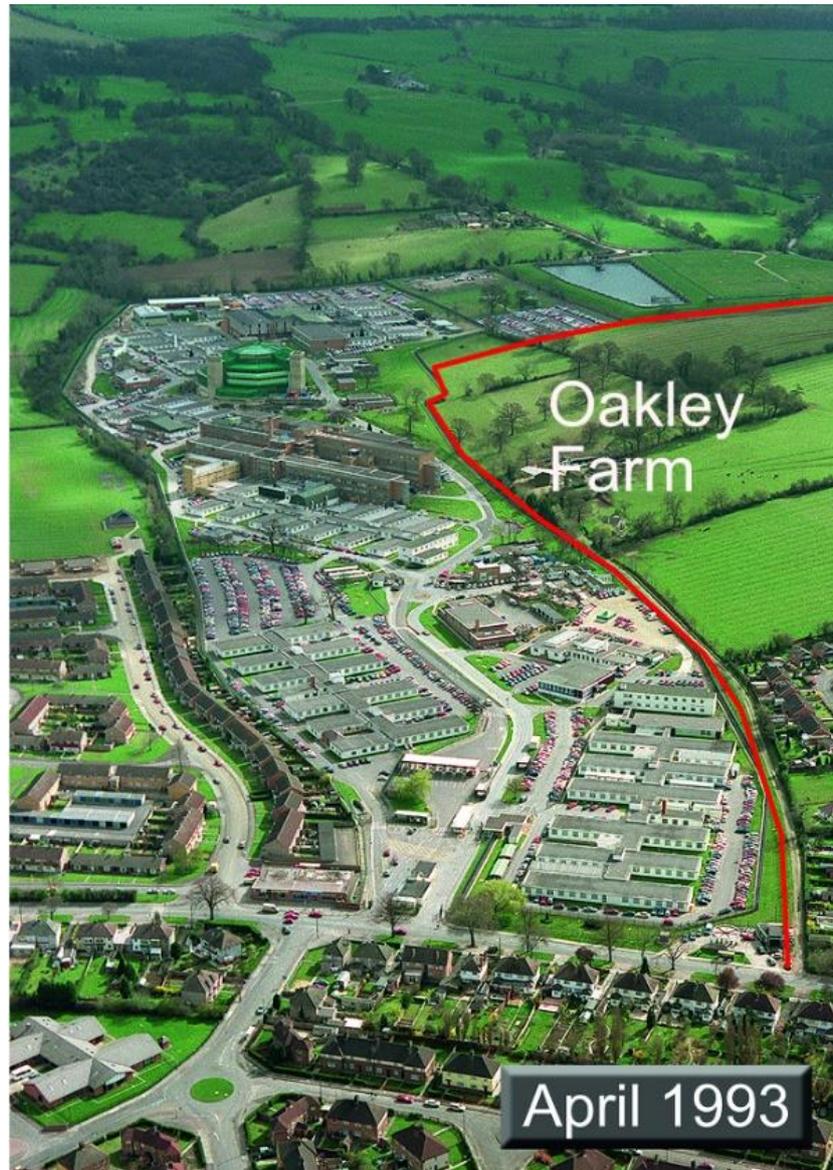


Fig 1. Little difference in the built mass between the 1990s and now.

Though the land is surrounded on three sides by residential development, its intrinsic qualities and open character contribute to expansive views both within and without the AONB. These attributes are unaffected by the position of Oakley Farm, and the existing urban edge exerts very little influence and does not devalue its influence on the character and landscape quality of the AONB. Information provided by the Costwolds Conservation Board confirms this: in Woolmore, R (2004) *Designation History Series. Cotswolds AONB. Volume 1*. Countryside Commission, para. 58 refers to boundary changes along the eastern edge of Cheltenham in 1990, in which “the officers’ briefly discussed the problems of delineating AONB boundaries on urban settlement ‘edges’, and concluded that it was not appropriate for an AONB boundary to coincide with an urban edge unless the quality and character of the landscape has remained unimpaired by its proximity to urban development. With this principle in mind, the officers looked at a number of proposals for boundary

change ... and recommended that certain small areas adjacent to ... Cheltenham should be added to the AONB". In this case the westernmost field of this proposal justified its addition to the AONB in the 1990 boundary confirmation.

Further historical aerial views of the site can be found in the accompanying "Oakley Farm Photographic Catalogue".

The AONB's Special Qualities include "tranquillity", which is defined in the AONB Management Plan as "essentially the absence of inappropriate noise, development, visual clutter and pollution ... a feeling of being away from it all". This site in its current form clearly contributes to that tranquillity. It provides a peaceful environment for many wild animals and is an almost permanent residence to small herds of deer, both roe and muntjac, badgers, foxes, owls, bats and polecats.

Views and Visual Amenity

Standing at various edges of the site, unimpeded and green foreground views are afforded across to the escarpment and the far distance. Urbanising these views would therefore have a severe and adverse impact on this important and significant visual pleasure. All views whether into, within, without or through this section of AONB must be given the utmost protection. Vistas of new housing would be detrimental and marred even further by associated paraphernalia, such as clothes lines, waste bins, garden features and play areas. These would add to the overall suburbanisation effect arising from the proposal and would compromise the predominantly rural character of this part of the AONB when viewed from the adjacent footpaths.

The proposed development would result in an unwarranted intrusion into the Cotswold AONB which, if allowed, would result in severe degradation of the current visual amenity, creating significant and demonstrable harm to the qualities and intrinsic beauty of this part of the AONB. The development and its access roads would be very prominent from widespread elevated views from within the AONB. This would be particularly apparent from the highest point in the Cotswolds situated within the Cleeve Common SSSI, and from several footpaths on Cleeve Hill, including but not limited to an extended and open section of the nationally recognised Cotswold Way long distance trail.

More locally, the proposed development would be an extremely prominent feature from both Charlton Kings footpath 12 and Priors Road. Significantly, there would also be a very substantial alteration to the views of the Cotswold escarpment from the extensively used Cheltenham footpath 86, which borders the site's western boundary. New houses would dominate a large proportion of this view and the openness and rural feel of this footpath would be severely harmed. From Harp Hill, views from the road into the site would also be substantially altered. The broad leaved ancient and veteran oak trees, which form the foreground to stunning views of the Cotswold scarp, would be completely lost and replaced by development and slow growing mitigation greenery.

A selection of images from a variety of viewpoints is available in the accompanying "Oakley Farm Photographic Catalogue". These photographs show the long-range

visibility of the whole site from a wide area and also exhibit the value of its near view qualities.

Applicant's Environmental Statement (ES), section 6: Landscape and Visual

The number of new buildings and the extent of the access roads, footways, hard surfaced areas and other infrastructure would be of significant scale in this part of the AONB. Given the size, setting and the significantly adverse impact that the proposal will have upon the purposes for which this area was designated, it must be demonstrated that there are exceptional circumstances in order to permit development. The applicant has not shown this to be the case.

Within the applicant's Environmental Statement (ES), at 6.3.29 there is an opinion given that the site is isolated from open wider countryside by the engineering structures of Hewletts Reservoir, and there are various assertions of a disassociation with the wider AONB. However, this opinion can be readily contradicted, even by the applicant's own evidence. The attached photograph shows how well the sympathetically covered and concealed reservoir complex blends with the surrounding landscape creating a flawless visual continuance into the rising ground of the escarpment. This assessment is even confirmed in the applicant's own ES summary of baseline analysis at 6.3.61 with "...long distance views from the edge of Cleeve Common and the escarpment southwards towards the study site. From these views the site is experienced as part of a "green wedge" of land that extends from the landscape east of the study site area through the reservoir and into the general urban area"; and at 6.4.19 with "The structures of Hewletts Reservoir are engineered but maintain a green space adjoining Harp Hill which forms a link between the study site and the wider Cotswolds countryside".



Fig 2. Hewletts Reservoir well-disguised.

Within paras. 6.3.57 and 6.4.17 of the ES there is a misunderstanding of the location and outlook from residential margins on the east and northeast boundary of the study site. The western and southernmost sections of Birdlip Road are located within the AONB as are properties on Highnam Place, Ledbury Court and Bream Court. Several of the properties' daytime living accommodation rooms are located on the upper floors, which offer open outlooks and extensive near and long distance views into and through the site to the west, southwest and northwest. These views are far reaching and extend over the Cheltenham roof line and as far as the Welsh mountains. The significance of the landscape and visual effects from these locations has been significantly underestimated. The development proposal is in such close proximity to these dwellings that they will be subject to a high magnitude of visual change. Therefore, as a visual receptor, they must be assessed as **high susceptibility** and experience **regional value** views. Similarly, the outlook from properties along Brockweir Road and Pillowell Close affords views into the parkland setting that is Oakley Farm, and as such these also justify a higher assessed views descriptor.

considerable variance to the landscape. The outcome is a visual effect that can only ever be Major Adverse.

Below are current typical views into the study site from public viewpoints at PROW footpath 86 at the site's western edge, and from Harp Hill at the site's south east corner. These are each followed by indicative views from the same locations following the proposed development. These images do not seek to suggest house types or exact locations; rather they are presented to illustrate how the development could severely impact on views from within and through the AONB. Clearly, after development the outlooks will be radically changed and suffer significant harm. Outcomes such as these will be experienced from many locations at the site's peripheries.



Fig 4. Before development from mid-point PROW footpath 86.



Fig 5. Indicative outlook after the proposed development, year 1 same location.



Fig 6. Current scene from Harp Hill. Broad leaf oaks form the foreground to the Cotswold Escarpment. The Grade II listed Hewletts Reservoir Pavilion complements the scene



Fig 7. Indicative view after development, year 1. New housing now forms the viewpoint's foreground, detracting from the scene and the setting of the listed asset, Hewletts Reservoir Pavilion

It is our view that the overall landscape and visual effects of the development proposals will result in the **significant loss** of sloping pasture which makes a **major contribution** to the local landscape character and visual amenity. No amount of mitigation will repair the deterioration in outlook that will be experienced by many from adjacent footpaths, roadways and residences. The claim of inherent mitigation through retained vegetation and natural topography is baffling, particularly as the latter will be significantly altered with the proposal's intent to "cut and fill" to change the landform. The potential impacts are predicted to have the greatest landscape and visual effects on the immediately adjacent landscape which falls both within and within the setting of the AONB. Conserving and enhancing landscape and scenic beauty in the AONB is the critical thread and overriding requirement throughout planning policy and guidance, against which potential development within the AONB will be considered. It is our view that the applicant has failed to achieve this; the proposal is therefore contrary to both local and national planning policy in this regard.

Planning Policy

Joint Core Strategy (JCS)

Policy SD7: The Cotswolds Area of Outstanding Natural Beauty

"All development proposals in or within the setting of the Cotswolds AONB will be required to conserve and, where appropriate, enhance its landscape, scenic beauty, wildlife, cultural heritage and other special qualities. Proposals will be required to be consistent with the policies set out in the Cotswolds AONB Management Plan. The Management Plan and guidance are material considerations in determining planning applications in or affecting the AONB."

As outlined above, this development proposal fails to conserve or enhance this area of the AONB and so is contrary to JCS Policy SD7.

Policy SD10: Residential Development

"The JCS guides new housing development to sustainable and accessible locations as set out in Policy SP2."

...

2. Housing development will be permitted at sites allocated for housing through the development plan, including Strategic Allocations and allocations in district and neighbourhood plans

3. On sites that are not allocated, housing development and conversions to dwellings will be permitted on previously-developed land in the existing built-up areas of Gloucester City, the Principal Urban Area of Cheltenham and Tewkesbury town, rural service centres and service villages except where otherwise restricted by policies within District plans

4. Housing development on other sites will only be permitted where:

- i. It is for affordable housing on a rural exception site in accordance with Policy SD12, or;
- ii. It is infilling within the existing built up areas of the City of Gloucester, the Principal Urban Area of Cheltenham or Tewkesbury Borough's towns and villages except where otherwise restricted by policies within District plans, or;
- iii. It is brought forward through Community Right to Build Orders, or;
- iv. There are other specific exceptions / circumstances defined in district or neighbourhood.

...

All relevant policies in the JCS, district and neighbourhood plans will be applied alongside this policy to ensure that proposals have no detrimental impacts, including any impact on the amenity, economy, and natural, historic and built environment of their surroundings, on the local or strategic road network, or on the health of current or future residents.” (SD10 para 4.10.11)

This site, located outside of the Principle Urban Area of Cheltenham, is not allocated for housing in the development plan and neither is it contained in the Strategic Allocations. In fact, on several occasions it has been rejected for inclusion as being unsuitable and unachievable because of its AONB designation. The proposal therefore fails to meet the requirements of JCS Policy SD10.

Policy SD14: Health and Environmental Quality

“2. New development must:

- i. Cause no unacceptable harm to local amenity including the amenity of neighbouring occupants”

As previously highlighted, there are many properties which border the proposed site, both within the AONB and within the setting of the AONB. Many of these neighbouring occupants will be significantly and detrimentally affected by the proposed development. Loss of outlook, overlooking and loss of privacy will be unwelcome consequences faced by many. Residential amenity, including residential visual amenity, has been given little regard in the indicative masterplan and the impact has been significantly underestimated in the applicant's Environmental Assessment.

It is clear that local amenity will diminish significantly. Long range views from the adjacent footpath 86 will be truncated and replaced with near views of housing development. The far-reaching outlook from Harp Hill to the AONB escarpment, with the hedgerows and ancient and veteran oaks of the site which currently fill the foreground view, would be replaced with development housing and connecting roadways. Similarly, the expansive views to the Malvern Hills AONB would have a foreground filled with new development.

This development will create significant and unacceptable harm to the local amenity including the amenity of neighbouring residential occupants contrary to JCS Policy SD14.

Cheltenham Plan 2020

Policy L1: Landscape and Setting

“Development will only be permitted where it would not harm the setting of Cheltenham including views into or out of areas of acknowledged importance.”

Para. 7.1. “Cheltenham owes much to its setting at the foot of the Cotswold escarpment. The town’s eastern fringes include the high-quality scenery of the escarpment, with landscape and woodlands that are designated as part of the Cotswolds Area of Outstanding Natural Beauty (AONB).”

Para. 7.4. “Cheltenham’s attractive setting is undoubtedly one of its prime assets and is recognised by the emerging Place Strategy for the Borough as a key factor in helping to achieve sustainable economic growth and securing social wellbeing. The Council will therefore seek to continue the protection of the town’s setting and encourage its future enhancement through sensitively designed / located development.”

Para. 7.5. “In doing so, the Council is mindful of the need to protect views into and out of areas of acknowledged importance such as ... the AONB, ... listed buildings and buildings of local importance.”

Para.7.6. “The above policy is designed not only to complement the policy stance of the Joint Core Strategy (JCS) but also to add further dimension through the recognition of local distinctiveness and the particular environmental qualities that make Cheltenham special.”

Para. 8.3. “Because of its attractive character, which derives from its built form as well as the landscape of the scarp edge, and its location on the urban fringe, the AONB in the Borough is particularly sensitive to development pressures. A restrictive approach is therefore necessary to conserve and enhance both of these elements. The Council considers it particularly important to protect the scarp as the dominant feature of Cheltenham’s setting and is concerned at the cumulative effect of even small-scale development and of development in new locations within the AONB.”

Para 8.4. “In assessing proposals for development, the Council will be guided by Para.172 of the National Planning Policy Framework (NPPF), Policy SD7 of the Joint Core Strategy (JCS) and the advice of the Cotswold Conservation Board with reference to the latest iteration of the Cotswold AONB Management Plan.”

Cotswolds AONB Management Plan

Policy CE1: Landscape

“1. Proposals that are likely to impact on, or create change in, the landscape of the Cotswolds AONB, should have regard to, be compatible with and reinforce the

landscape character of the location, as described by the Cotswolds Conservation Board's Landscape Character Assessment and Landscape Strategy and Guidelines.

2. Proposals that are likely to impact on, or create change in, the landscape of the Cotswolds AONB, should have regard to the scenic quality of the location and its setting and ensure that views - including those into and out of the AONB – and visual amenity are conserved and enhanced.”

Policy CE11: Major Development

“Proposals for major development in the Cotswolds AONB and in the setting of the AONB, including site allocations in Local Plans, must comply with national planning policy and guidance and should have regard to – and be compatible with - the guidance on major development provided in Appendix 9 of the Cotswolds AONB Management Plan.”

Appendix 9 of Cotswolds AONB Management Plan:

“The purpose for which the Cotswolds AONB has been designated is to conserve and enhance its natural beauty. Therefore, the judgement as to whether or not a development is major development depends, to a large degree, on whether or not the development could have a significant adverse impact on the natural beauty of the AONB. As outlined in Appendix 2, natural beauty incorporates a number of criteria, including landscape quality, scenic quality, tranquillity, natural heritage and cultural heritage. Within the context of the Cotswolds AONB, those aspects of the AONB's natural beauty which make the area distinctive and which are particularly valuable – the AONB's special qualities - are listed in Chapter 2. []*

On this basis, a development should be considered ‘major’ if, by reason of its nature, scale and / or setting, it could have a significant adverse impact on any of the above criteria, including the AONB's special qualities. As well as potential impacts within the AONB, consideration should also be given to impacts on these criteria within the setting of the AONB, particularly in the context of visual impact (i.e. views into and out of the AONB), dark skies and tranquillity.”

[* Relevant ‘Special Qualities’ from Chapter 2 are:

- *“the Cotswold escarpment, including views from and to the AONB;*
- *the tranquillity of the area, away from major sources of inappropriate noise, development, visual clutter and pollution;*
- *significant archaeological, prehistoric and historic associations dating back 6,000 years, including... ridge and furrow fields”]*

We consider that this planning proposal would not accord with these criteria and special qualities. Drawing the above together we consider that the proposal will materially harm the natural beauty of this area of AONB and have a significant adverse impact upon the purposes for which this area was designated. The applicant's Environmental Statement Table 6.6 confirms that the development proposal will significantly impact upon views from several locations to a Minor/Moderate Adverse degree, although in our opinion this is an underestimation of the degree of harm caused, and more appropriate gradings would be

Major/Moderate Adverse. Nevertheless, this is a clear indication that the scenic beauty and visual amenity will be neither conserved nor enhanced by this proposal.

National Planning Policy Framework (NPPF)

Para 170:

“Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland”

Para 171:

“Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework⁵³; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.”

Along with National Parks, AONBs have the highest status of protection with regards to conserving landscape and scenic beauty and are nationally designated sites with huge environmental and amenity value. It therefore stands to reason why Oakley Farm has been discounted for inclusion in previous and current development plans. The loss or diminution of this landscape would significantly harm the character and appearance of the area.

Para. 172:

“Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues... The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development⁵⁵ other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*

- b) *the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*
- c) *any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”*

By extending the built environment into this area of the AONB, the proposal would diminish and encroach on the pleasant and distinctly rural views when seen from the roads and public footpaths in the general vicinity. Accordingly, it would have a significant detrimental effect on the character and appearance of the area, conflicting with the purpose of conserving and enhancing the scenic beauty of the AONB.

The proposed development would conflict with para. 170 in the NPPF in that it fails to contribute to and enhance the natural and local environment by: a) protecting and enhancing this valued landscape and b) failing to recognise the intrinsic character and beauty of the countryside.

We can find no exceptional circumstances why this development should be permitted. There are no national considerations and it would have a negligible benefit on the local economy. The detrimental effect, however, on the environment, landscape and recreational visual amenity would be negative and significant. Given that great weight should be given to conserving and enhancing the landscape and scenic beauty of the AONB the balance falls firmly on the significant harm that would be caused.

Cheltenham Borough Council Landscape Character, Sensitivity and Capacity Assessment of Cotswolds AONB / May 2016

Cheltenham Borough Council commissioned Ryder Landscape Consultants to undertake a Landscape Character, Sensitivity and Capacity Study of the Cotswolds AONB and Cheltenham Urban Fringe as part of its emerging Cheltenham Plan. This was published in 2015 and later revised in 2016. This included an assessment of the visual amenity and the value and potential capacity to accommodate new development in areas of the AONB.

Oakley Farm Pasture Slopes, the site of the development proposal, was wholly and specifically included in this study. Extracts from the study and conclusions are as follows:

Landscape Character Area Site Ref: LCA 7.1. Oakley Farm Pasture Slopes:

Visual Sensitivity:

*“...the views looking from the area are expansive and panoramic, resulting in an overall visual sensitivity of **High**.”*

Landscape Character Sensitivity:

“...the small to medium scale of the landscape character area, high levels of well maintained boundary vegetation, sloping topography and views into the area from

adjacent residential properties and Harp Hill, the overall landscape sensitivity is assessed as **High**.”

Landscape Value:

*“The landscape character area falls within the designated area known as the Cotswolds AONB, which is a national designation. With the numerous footpaths that exist across the character area, the area has moderate recreational value. With the sloping topography of the landscape the land is particularly visible from residential properties to the south of the area. The visual connections with the escarpment slopes to the northeast of the area are valuable perceptual aspects. The quality of the landscape elements are moderate, with predominantly hedgerow boundaries in good condition. Given the LCA falls within a nationally recognised AONB designation, and taking into consideration the visibility of the site and the generally good condition, the overall value of the landscape character area is assessed as **High**.”*

Resulting in:

*Overall Landscape Constraint of “**Major Overall**”*

and

*Resulting Landscape Capacity of “**Low Overall**”*

When combining the above, it is concluded that the proposed development would result in severe harm to the site’s landscape character, create a harmful visual impact in respect of views from several escarpment locations and from roads and public footpaths around Harp Hill, Brockweir Drive and Cheltenham footpath 86, and would cause great harm to the natural beauty of the AONB. In this regard the scheme would be in conflict with the previously noted development plan policies. The applicant has attempted to subdivide the site and devalue the lower slopes in an attempt to justify the development. The site must be assessed as a whole; it was collectively designated and reconfirmed as AONB and as such must remain. The lower sections play a significant part in the overall parkland feel of the area and would justify protection in equal measure to the upper slopes. We consider that the proposal would:

- cause severe harm to the local landscape character, which would lose its visual connection with the escarpment and the remaining expanse of the Cotswolds AONB;
- represent significant and demonstrable harm to the AONB and the setting of the Cotswolds Escarpment; and
- be conspicuous in valued and elevated views from within and without the AONB, resulting in substantial harm to the rural character of valued landscapes.

5 Year Housing Land Supply

The Council accepts that it is unable to demonstrate a five year housing land supply (HLS) within the district. This would invoke the guidance in NPPF para. 11. d). Further, regard must be given to para. 11. d) i. Because the planning authority cannot demonstrate a five year housing land supply then the policies which are

considered most important for determining the application are to be considered out of date. The whole test would result in applying 11. d) i. as follows:

“11. Plans and decisions should apply a presumption in favour of sustainable development.

...

For **decision-taking** this means:

d) where ... the policies which are most important for determining the application are out-of-date⁷, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed⁶”

⁶ “The policies referred to are those in this Framework (rather than those in development plans) relating to ... land designated as ... an Area of Outstanding Natural Beauty...”

⁷ “This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites...”

The protected area referred to in 11. d) i. in this case is the AONB and the relevant policy referred to is NPPF para. 172.

Case law offers guidance in this area as follows:

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

The following paragraphs are the most relevant, however, the whole case can be found here: <https://www.bailii.org/ew/cases/EWHC/Admin/2019/1993.html>.

“8. Paragraph 172 of the NPPF sets out the policy on development in AONBs, National Parks and the Broads. The first part of the policy applies to development generally within these designated areas and provides as follows: -

“Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited.””

“51. It is necessary to read the policy in paragraph 172 as a whole and in context. Paragraph 170 requires planning decisions to protect and enhance valued landscapes in a manner commensurate with their statutory status and any qualities

identified in the development plan. Paragraph 172 points out that National Parks, the Broads and AONBs have "the highest status of protection" in relation to the conservation and enhancement of landscapes and scenic beauty. Not surprisingly, therefore, paragraph 172 requires "great weight" to be given to those matters. The clear and obvious implication is that if a proposal harms these objectives, great weight should be given to the decision-maker's assessment of the nature and degree of harm. The policy increases the weight to be given to that harm.

52. Plainly, in a simple case where there would be harm to an AONB but no countervailing benefits, and therefore no balance to be struck between "pros and cons", the effect of giving great weight to what might otherwise be assessed as a relatively modest degree of harm, might be sufficient as a matter of planning judgment to amount to a reason for refusal of planning permission, when, absent that policy, that might not be the case. But where there are also countervailing benefits, it is self-evident that the issue for the decision-maker is whether those benefits outweigh the harm assessed, the significance of the latter being increased by the requirement to give "great weight" to it. This connotes a simple planning balance which is so obvious that there is no interpretive or other legal requirement for it to be mentioned expressly in the policy. It is necessarily implicit in the application of the policy and a matter of planning judgment. The "great weight" to be attached to the assessed harm to an AONB is capable of being outweighed by the benefits of a proposal, so as to overcome what would otherwise be a reason for refusal.

53. Interpreted in that straight forward, practical way, the first part of paragraph 172 of the NPPF is capable of sustaining a clear reason for refusal, whether in the context of paragraph 11(d)(i) or, more typically where that provision is not engaged, in the general exercise of development management powers."

"63. For all these reasons the claim is dismissed. The first part of paragraph 172 of the NPPF qualifies as a policy to be applied under limb (i) of paragraph 11(d) of the NPPF; it is also capable of sustaining a freestanding reason for refusal in general development control in AONBs, National Parks and the Broads."

Conclusion:

This proposal is for inappropriate development in the AONB which will have severe and significant adverse effects on the natural and local environment even with mitigation measures in place. Its impacts will be widely evident with the loss or degradation of treasured views from many public viewpoints. Contrary to both national and local policy, the proposal will have no positive conserving or enhancing effect on landscape character, visual amenity or scenic beauty and will amount to a loss of openness and local distinctiveness in this area of the Cotswolds AONB. Policy dictates that in these areas great weight regarding conserving and enhancing landscape and scenic beauty must be given. Because of its location and these significant adverse effects on the character and appearance of the area, JCS SD7, SD10 and SD14 and NPPF 172 provide clear reason for refusing the proposed development.

20/01069/OUT

Oakley Farm Photographic Catalogue



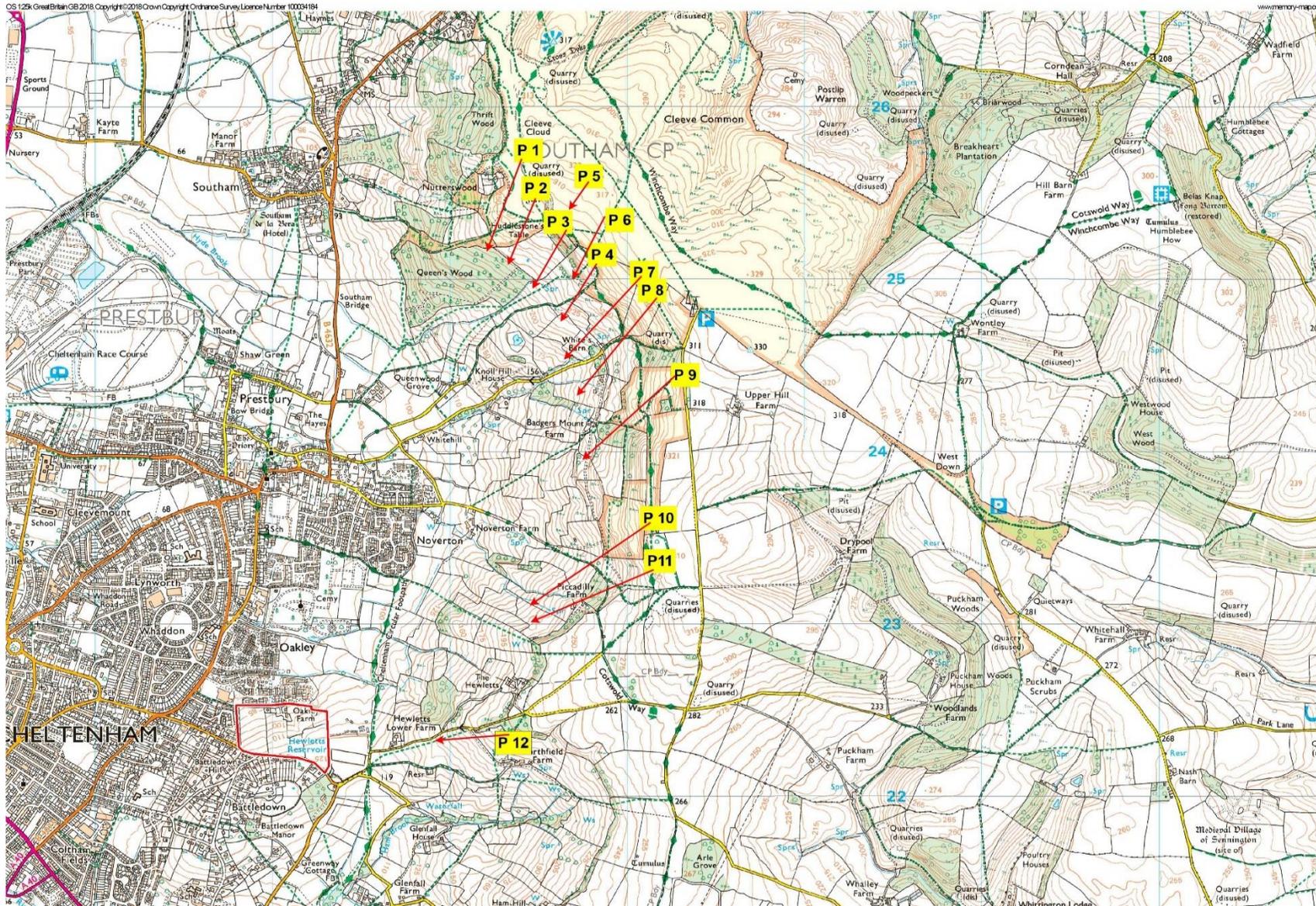
Page 481

Friends of Oakley Farm Pasture Slopes



www.oakleyfarmpastres.wixsite.com/oakley

Viewpoints into Oakley Farm Pasture Slopes from Public Rights of Way



Map 1

50mm View of Oakley Farm Pasture Slopes from: Within the AONB at Viewpoint P1 from National Trail, “The Cotswold Way”, Southam Footpath 116.



Fig 1.

**200mm View of Oakley Farm Pasture Slopes from: Within the AONB at Viewpoint P1, from National Trail, "The Cotswold Way",
Southam Footpath 116.**



Fig 2.

50mm View of Oakley Farm Pasture Slopes from: Within the AONB at Viewpoint P2 from National Trail, “The Cotswold Way”, Southam Footpath 116.



Fig 3.

200mm View of Oakley Farm Pasture Slopes from: Within the AONB at Viewpoint P2 from National Trail, “The Cotswold Way”, Southam Footpath 116.



Fig 4.

50mm View of Oakley Farm Pasture Slopes from: Within the AONB at Viewpoint P3 from National Trail, “The Cotswold Way”, Southam Footpath 116.



Fig 5.

200mm View of Oakley Farm Pasture Slopes from: Within the AONB at Viewpoint P3 from National Trail, “The Cotswold Way”, Southam Footpath 116.



Fig 6.

50mm View of Oakley Farm Pasture Slopes from: Within the AONB at Viewpoint P4 from Southam Footpath 49.



Fig 7.

200mm View of Oakley Farm Pasture Slopes from: Within the AONB at Viewpoint P4 from Southam Footpath 49.



Fig 8.

50mm View of Oakley Farm Pasture Slopes from: Within the AONB at Viewpoint P5 from Cleave Common Memorial Tree.



Fig 9.

200mm View of Oakley Farm Pasture Slopes from: Within the AONB at Viewpoint P5 from Cleave Common Memorial Tree.



Fig 10.

50mm View of Oakley Farm Pasture Slopes from: Within the AONB at Viewpoint P6 from Southam Footpath 49.



Fig 11.

200mm View of Oakley Farm Pasture Slopes from: Within the AONB at Viewpoint P6 from Southam Footpath 49.



Fig 12.

50mm View of Oakley Farm Pasture Slopes from: Within the AONB at Viewpoint P7 from Southam Footpath 67.



Fig 13.

200mm View of Oakley Farm Pasture Slopes from: Within the AONB at Viewpoint P7 from Southam Footpath 67.



Fig 14.

50mm View of Oakley Farm Pasture Slopes from: Within the AONB at Viewpoint P8 from Southam Footpath 67.



Fig 15.

200mm View of Oakley Farm Pasture Slopes from: Within the AONB at Viewpoint P8 from Southam Footpath 67.



Fig 16.

50mm View of Oakley Farm Pasture Slopes from: Within the AONB at The Bill Smyllie Reserve, Viewpoint P9, Long Distance Trail, "Sabrina Way". Southam Bridleway 113.



Fig 17.

200mm View of Oakley Farm Pasture Slopes from: Within the AONB at The Bill Smyllie Reserve, Viewpoint P9, Long Distance Trail, "Sabrina Way". Southam Bridleway 113.



Fig 18.

50mm View of Oakley Farm Pasture Slopes from: Within the AONB at Viewpoint P10 from National Trail, “The Cotswold Way”, Southam Footpath 102.



Fig 19.

200mm View of Oakley Farm Pasture Slopes from: Within the AONB at Viewpoint P10 from National Trail, “The Cotswold Way”, Southam Footpath 102.



Fig 20.

**100mm View of Oakley Farm Pasture Slopes from: Within the AONB at Viewpoint P11 from National Trail, “The Cotswold Way”.
Southam Footpath 102.**



Fig 21.

**200mm View of Oakley Farm Pasture Slopes from: Within the AONB at Viewpoint P11 from National Trail, “The Cotswold Way”.
Southam Footpath 102.**



Fig 22.

50mm View of Oakley Farm Pasture Slopes from: Within the AONB at Viewpoint P12 from Charlton Kings Footpath 12.



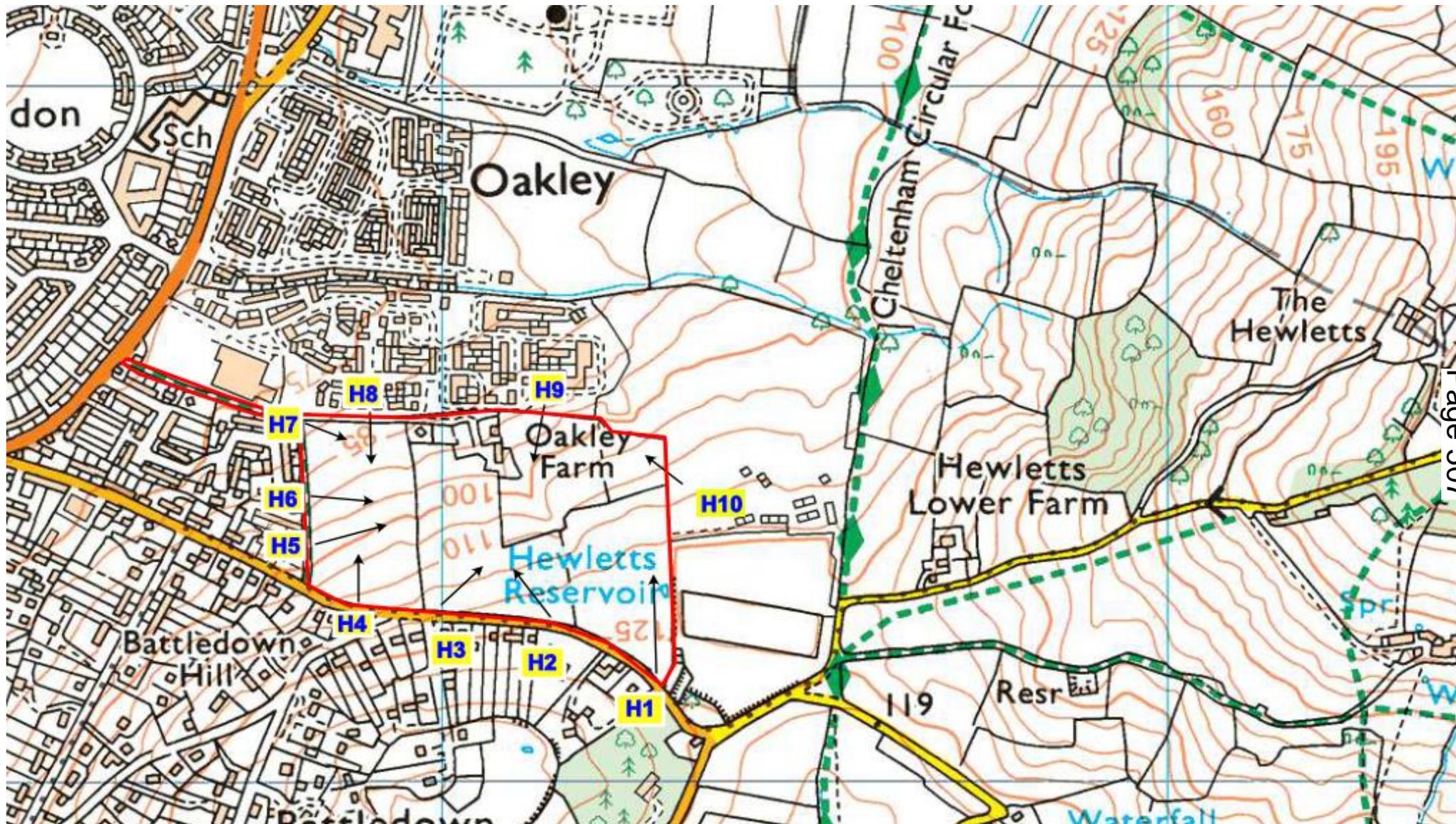
Fig 23.

200mm View of Oakley Farm Pasture Slopes (Outlined in Red) from: Within the AONB at Viewpoint P12 from Charlton Kings Footpath 12.



Fig 24.

Viewpoints into Oakley Farm Pasture Slopes from Public Rights of Way and access points in the site's vicinity.



Map 2

View H1. from Harp Hill looking North through Oakley Farm Pasture Slopes towards Cleeve Common SSSI, Nottingham Hill and Oxenton Hill.



Page 508

Fig 25.

View H2. from Harp Hill looking NNW through Oakley Farm Pastures Slops towards The Malvern Hills AONB



Fig 26.

View H3. From Harp Hill looking NE through Oakley Farm Pasture Slopes AONB towards Cleeve Common, SSSI, and AONB. Oakley Farm buildings in the middle left.



Fig 27.

Panoramic View H4. From Harp Hill looking NNE through Oakley Farm Pasture Slopes, AONB, towards Cleeve Common SSSI. And Nottingham Hill.



Fig 28.

View H5. From Cheltenham Footpath 86 looking NE through Oakley Farm Pasture Slopes, AONB, towards AONB Escarpment.



Fig 29.

View H6. From Cheltenham Footpath 86 looking East through Oakley Farm Pasture Slopes, AONB, towards Cleeve Common SSSI, and the AONB.



Page 513

Fig 30.

View H7. From Cheltenham Footpath 86 looking SE into Oakley Farm Pasture Slopes, AONB.



Fig 31.

View H8. From Pillowell Close looking S into Oakley Farm Pasture Slopes, AONB.



Fig 32.

View H9. From Brockweir Drive looking S into Oakley Farm Pasture Slopes, AONB.



Fig 33.

View H10. From Birdlip Road looking NW into Oakley Farm Pasture Slopes, AONB.



Fig 34

Google Earth View 1945

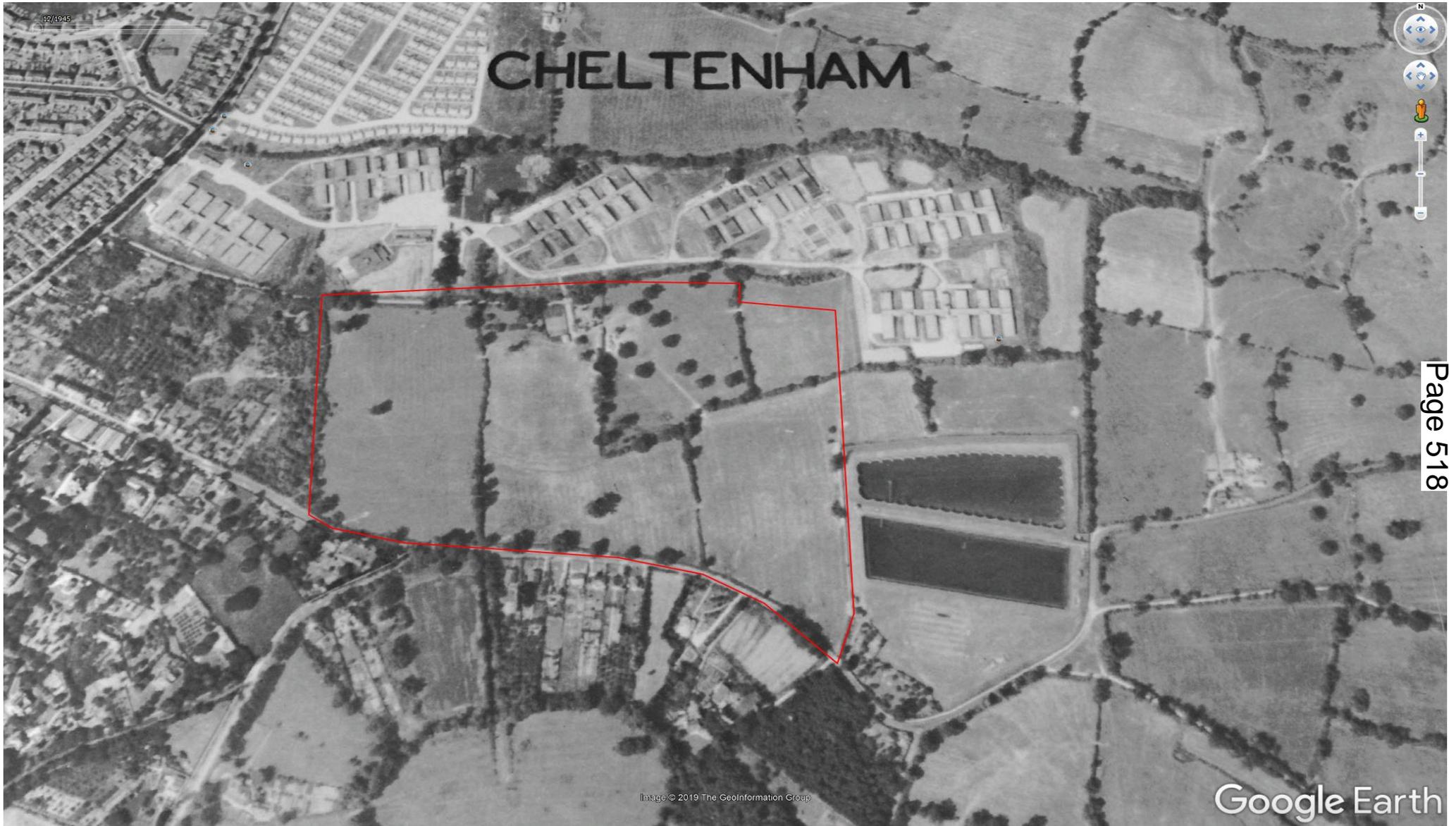


Fig 35

Google Earth View 1990s



Fig 36

Aerial View from West 1990s



Page 520

Fig 37

Aerial View from West 2019



Fig 38

This page is intentionally left blank

Addendum 1

Oakley Farm Planning Objection 20/01069/OUT



Friends of Oakley Farm
Pasture Slopes



wixsite.com/oakley

Opening

The application is a speculative planning proposal in an Area of Outstanding Natural Beauty (AONB), a designated National Landscape. Its approval would not be in the public interest. What follows are factors that we have not addressed in our previously submitted objection, or which have subsequently become apparent and may influence a planning decision.

The Cheltenham Plan

“The Cheltenham Plan identifies local sites suitable for new homes and jobs while protecting our exceptional natural and built environment.”¹

*“In a plan-led system, the development plan and neighbourhood plans set out the overarching context and specific policies that are used to manage and guide development through the decisions the Council makes on planning applications. The development plan also sets out higher-level objectives and aspirations that aim both **to conserve what is valued and cherished within Cheltenham and to encourage development in spatial and policy areas the Council wishes to promote in the public interest.**”²*

Vision Theme C

Cheltenham is a place where the quality and sustainability of our cultural assets and natural and built environment are valued and recognised locally, nationally and internationally, and where tourists choose to visit and return.

Theme C Objectives

a) Conserve and enhance Cheltenham’s architectural, townscape and landscape heritage both within and out of the town’s conservation areas;

b) Conserve, manage and enhance Cheltenham’s natural environment and biodiversity, including its parks and gardens, its trees and green spaces, its countryside, and the Cotswolds Area of Outstanding Natural Beauty”³

Exceptional Circumstances and Public Interest

Amongst other matters, para. 172 of the National Planning Policy Framework (NPPF) refers to major development in the AONB and states:

“Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;

b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and

c) any detrimental effect on the environment, the landscape and recreational

¹ Cheltenham Plan 2020, foreword by Leader of the Council.

² Cheltenham Plan 2020 para. 1.4 [our bold/underline]

³ Cheltenham Plan 2020 para 2.9 Vision Theme C and objectives.

opportunities, and the extent to which that could be moderated.”

Cheltenham cannot currently provide a 5-year housing land supply (5YHLS). However, this is not considered exceptional as many local authorities, circa 30%, are in a similar position.

It is accepted that there is an identified need for more housing in the Cheltenham area, but it is not accepted that within the evidence submitted by the applicant, proof of “exceptional circumstances” has been provided. The application documentation does not provide a compelling set of facts to confirm what the exceptional circumstances that weigh in favour of this application are, such as to outweigh the significantly harmful impact of the proposal on the conservation and enhancement of the landscape and scenic beauty of the AONB, which is a designated national landscape.

It may be that there is a pressing need for more housing land, but a pressing need is not in itself an exceptional circumstance. A distinction between a pressing case and a genuinely exceptional need in the sense of unusual or rare,⁴ or even simply untypical, has not been established. There is no doubt that 250 houses would be a benefit to Cheltenham’s housing requirement, but this is only an ordinary or expected benefit and does not warrant exceptional justification.

The applicant makes no claim that the housing supply issue in the Cheltenham area is unusual or untypical, let alone exceptional. And, whilst it is noted that the proposal would provide a contribution to the Cheltenham 5YHLS, the circumstances cannot be considered exceptional or in the public interest. Therefore, combining this with the agreed significantly adverse impact that the proposal will have on the landscape^{5 6}, and the proposal’s non-compliance with the development plan, the application should be refused. Adding further weight to this argument, are the overwhelming Parish Council and public objections to the proposed development in this National Landscape, both of which clearly emphasise that it is not in the public interest. An application which is non-compliant with a Development Plan may be considered as a factor not in the public interest.⁷

In the applicant’s planning statement at 7.8, referring to NPPF para. 172 (a)-(c), it is suggested that “Taking each of these points it can be demonstrated that there are exceptional circumstances which result in the favourable consideration of the site for development in the public interest”. However, the applicant then subsequently fails to demonstrate any exceptional circumstances, relying on nothing more than a reiteration of the aforementioned unexceptional lack of a 5YHLS in Cheltenham. Again, whilst it may be desirable that Cheltenham provides a 5 YHLS, it is not of national or local importance that Oakley Farm is developed in order to contribute to this. Any assessment of exceptional circumstances must not only be carried out for a specific development proposal, but its basis and method explained and its conclusions clearly demonstrated. Furthermore, even if there was a proven exceptional need for housing in the area, this would not necessarily equate to exceptional circumstances for this particular land to be developed: alternative sites will become available, and the significant detrimental effect and permanent damage that this proposal will have on the landscape at Oakley Farm will not be in the public interest.

⁴ Mevagissey Parish Council, R (on the application of) v Cornwall Council & Anor [2013], para. 52 i)

⁵ Applicant’s Environmental Statement 6.7.2 “The Oakley Pasture Slopes LCA will retain a **Moderate Adverse** residual impact through the loss of pasture and introduction of urban features.”

⁶ Council’s Landscape Architect’s Review of landscape and visual section of Environmental Statement, s.10 - Summary of effects: “For the actual Oakley Farm Pasture Slopes landscape effect it will remain higher at **Moderate/Major, Adverse and Permanent.**”

⁷ Appeal decisions APP/D3830/W/19/3231996 and APP/D3830/W/19/3231997 | Decision date: 16th December 2019 para. 142

Alternative Sites for Development

Cheltenham cannot currently meet its 5YHLS and may not achieve its housing delivery in the plan period. This speculative planning application is predicated on this assumption. However, this housing shortfall is only a transient position which has arisen from the delay to the strategic development proposals to the west and north west of Cheltenham. These in turn have been delayed due to transportation issues, in particular to the M5 junction 10 improvement scheme. Progress is now being made in these areas. Also, since its inception, the JCS has been under review with a forecast adoption in 2023. Strategic development land will be identified in this review to address the current Cheltenham shortfall,⁸ which may require the release of green belt, i.e. land with a local designation as opposed to the nationally designated AONB. Also, although in its infancy, the Golden Valley development has potential for 3000+ homes with a forecast delivery start of 2022/23. Further, the proposed development at the North Place and Portland Street site⁹ has further housing development potential subject to replanning.¹⁰

It is agreed that the temporary shortage of housing is due to the strategic allocations being delayed. This strategic shortfall should not be recovered, even partially, by a non-strategic allocation from within the AONB, a nationally designated area. A letter of support for the Cheltenham Plan Examination acknowledges this strategic shortfall and confirms that it will be dealt with by JCS review rather than the local plan.¹¹

Considering development proposals within the AONB, JCS SD7 states: *“Proposals will be required to be consistent with the policies set out in the Cotswolds AONB Management Plan.”* This position is also reflected in chapter 8 of the Cheltenham local plan. Significantly, SD7 was endorsed by the Planning Inspector who, when reviewing the Cheltenham Plan, commented: *“JCS Policy SD7 provides adequate protection for the Cotswolds AONB and its setting from the harmful effects of new development”.*¹² In addition, Policy CE12 of the AONB Management Plan, which provides a guide to SD7, states: *“Development in the Cotswolds AONB should be based on robust evidence of local need arising from within the AONB”.* This in turn is supported by the Government’s Planning Practice Guidance at Paragraph: 041 Reference ID: 8-041-20190721 which offers *“The National Planning Policy Framework makes clear that the scale and extent of development in these areas should be limited, in view of the importance of conserving and enhancing their landscapes and scenic beauty... they are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas.”*

Together with the alternative sites and areas identified above and the review of the JCS strategic allocations, Cheltenham’s development land shortfall will be addressed. The JCS is scheduled to report as follows¹³:

Regulation 18: Draft Plan consultation: Autumn 2021
Regulation 19: Spring/Summer 2022
Adoption: 2023

⁸ Five Year Housing Land Supply Position Statement December 2019, para. 19

⁹ HD9 in the Cheltenham Plan.

¹⁰ The Planning Inspectorate Report on the Examination of the Cheltenham Plan 2011-2031 17th March 2020, para. 62

¹¹ JCS SD016 Letter of Support for Examination 21st September 2018, 5th para.

¹² Examination into the soundness of the Cheltenham Plan (CP) 2011-2031, para. 41

¹³ Detail provided directly by the JCS team November 2020.

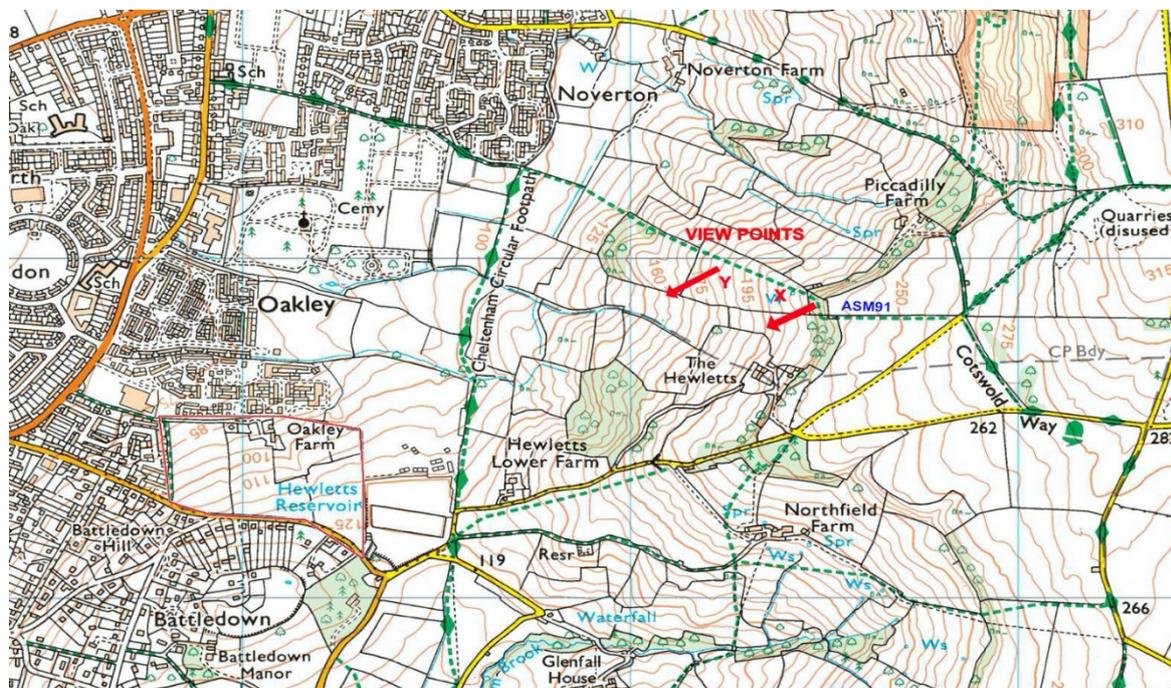
Cotswolds AONB Landscape Led Development

The Cotswolds AONB Management Plan policy CE11 states: “Any major development proposed in the Cotswolds AONB, including major infrastructure projects, should be ‘landscape-led’, whereby it demonstrably contributes to conserving and enhancing the natural beauty of the Cotswolds AONB and, where appropriate, to the understanding and enjoyment of its special qualities.” As previously shown, the applicant’s own environmental statement at 6.7.2 recognises and summarises the significance of the landscape effects of the proposal on the site and declares that it will be permanently and moderately adversely effected. This is a significant adverse effect on the landscape and conflicts with the requirements of policy CE11 and a landscape-led approach. The Council’s landscape architect goes further and identifies that the overall landscape effects of the proposal would in fact be significantly more detrimental and grades it as **Major/Moderate, Adverse and Permanent**. This provides a clear signal that the site must be protected in its capacity as a nationally designated landscape.

Viewpoint from PROW Southam Footpath 91

Although not previously considered in the Environmental Assessment or the Council’s Landscape Architect’s report, the views from this popular and well-used PROW ASM91 into the site would be subject to significant change. The following photographs, viewpoints X & Y, demonstrate the open ground of the site running into the urban expanse of Cheltenham. It illustrates the site’s positive character on the edge of Cheltenham and emphasises the adverse effect its loss would have on the town’s setting when viewed from this section of the surrounding escarpment. The views from this PROW, which runs within the Cotswolds AONB, show the site in the middle distance with Cheltenham, Gloucester, Chosen Hill, Robinswood Hill and the Cotswold escarpment as the backdrop.

The photographs are presented as another indication of the site’s visibility from within the AONB.



PROW ASM91 Viewpoint Locator map



Viewpoint X PROW ASM 91 Southam Footpath 91



Viewpoint Y PROW ASM 91 Southam Footpath 91

Planting Mitigation

The proposed tree planting mitigation on the “upper slopes” creates its own significant detrimental landscape and visual impact. The claimed open space and associated benefits, which will be created on these upper slopes, would be extremely limited by the new estate roads and tree planting. An enclosing effect would be created by the very trees that are intended to provide mitigation against the significantly detrimental visual effects of the new housing. The claim of creating new views from the upper slopes is true, however these new views will have an extremely limited range given the tree mitigation that is proposed. It should also be emphasised that many of the “new views” are in fact not being created but are reinstated views previously enjoyed from Harp Hill. The southern boundary hedge has been allowed to grow uncontrolled, and consequently expansive views to the escarpment, that were available for all to enjoy over many years, are now blocked by a lack of maintenance to this boundary hedge. It should be noted that a direction in the scoping opinion for the southern hedge to be trimmed for viewpoint photography has been disregarded by the applicant.

Conclusion

We maintain that this proposal is for inappropriate development in the AONB which will have severe, significant and permanent adverse effects on the natural and local environment, even with mitigation measures in place. There are no exceptional circumstances proved and, as indicated by the decision of the Parish Council and the volume of public objections (with not a single letter of public support to date), we see no case to suggest that it would be in the public interest to permit.

Taken in order we consider that the planning proposal would fail to comply with all of the following, either individually or in combination:

1. NPPF para. 11(d)(i), para. 170 and the first part of para. 172 in its own right.
2. The major development consideration in NPPF para. 172 and the public interest and exceptional circumstances test at sub paras. (a)-(c).
3. The “Tilted Balance” NPPF para. 11(d)(ii), taking NPPF paras. 170, 172 & 196, JCS Policies SD7, SD10 & SD14, and Cheltenham Local Plan Policy L1 & ch. 8.

Appeals Lodged APR/MAY 2021

Address	Proposal	Delegated or Committee Decision	Appeal Type	Anticipated Appeal Determination Date	Reference
Lotty Lodge 33 Wellesley Road Cheltenham Gloucestershire GL50 4LD	Use of part of ground floor as dog grooming business (sui generis)	Committee Decision	Written representation	July 2021	Appeal ref: 21/00004/PP1 Planning ref: 20/01311/FUL

Appeals Determined

Address	Proposal	Delegated/Committee Decision	Appeal Type	Outcome	Reference
Land Adjacent To Oakhurst Rise Cheltenham Gloucestershire	Outline application for 43 dwellings including access, layout and scale, with all other matters reserved for future consideration	Committee Decision	Appeal Inquiry	Appeal Dismissed	Appeal ref: 20/00021/PP1 Planning ref: 20/00683/OUT

Authorised By: Mike Holmes 11.05.2021

This page is intentionally left blank