



Neighbourhood Development Plan

2011 – 2031

*The Parishes of
Down Hatherley,
Norton and
Twigworth*

Keeping our rural character, improving the quality of life



***You cannot escape the responsibility of tomorrow
by evading it today***

Abraham Lincoln

Foreword

Rural villages have evolved organically over the centuries in order to meet local needs. This has resulted in the charm, the natural and historic elements as well as its functionality which we hold so dearly.

Appreciating the need to contribute to present day housing requirements goes hand in hand with the wish to maintain the character of the hamlets, safeguarding the environment and the way of life of the parishioners.

Local knowledge is important but often ignored. The local reaction to development is often referred to as nimbyism but in reality, it can be the result of bad experiences, decision makers not taking local views into consideration the past or plain and simple local knowledge.

The Localism Act 2011 devolves greater powers to councils and neighbourhoods to give local communities more control over housing and planning decisions.

No village exists in isolation. What happens in one often has an impact on another, whether it is the congestion of road systems, flood alleviation or foul water disposal. Parochial interests have been pushed to one side and three parishes have worked together to draw up this Neighbourhood Development Plan for the parishes of Down Hatherley, Norton and Twigworth.

Through our rigorous analysis and consultations, we have defined the settlement boundaries for Norton and Twigworth. These are specified in map1 and map3, otherwise the maps displayed in the document are for indicative purposes only.

This NDP has achieved the Building with Nature Award, through the Gloucestershire Wildlife Trust.

The steering committee wish to express their thanks for the guidance and support given to them by the staff of the Local Planning Authority and the Gloucestershire Community Council.

**DOWN HATHERLEY, NORTON AND TWIGWORTH
NEIGHBOURHOOD DEVELOPMENT PLAN**

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Introduction to the Plan

1. At the heart of the Localism Act is the right for communities to have a powerful say of what happens in their communities through their Neighbourhood Development Plan (NDP).

‘Instead of local people being told what to do, the Government thinks that local communities should have genuine opportunities to influence the future of the places where they live. The Act introduces a new right for communities to draw up a neighbourhood plan’ (DCLG, 2011).

2. It is clarified further in the National Planning Policy Framework (NPPF) which states:

“Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need” (Paragraph 138 NPPF, 2012).

3. This NDP, having followed due process, will ensure sustainable development that is needed to deliver the vision shared by the three parishes.
4. During the preparatory stages of this plan we had regard to the Saved Policies of the Tewkesbury Borough Local Plan to 2011 (TBLP). In December 2017 the Statutory Development Plan replaced the TBLP.

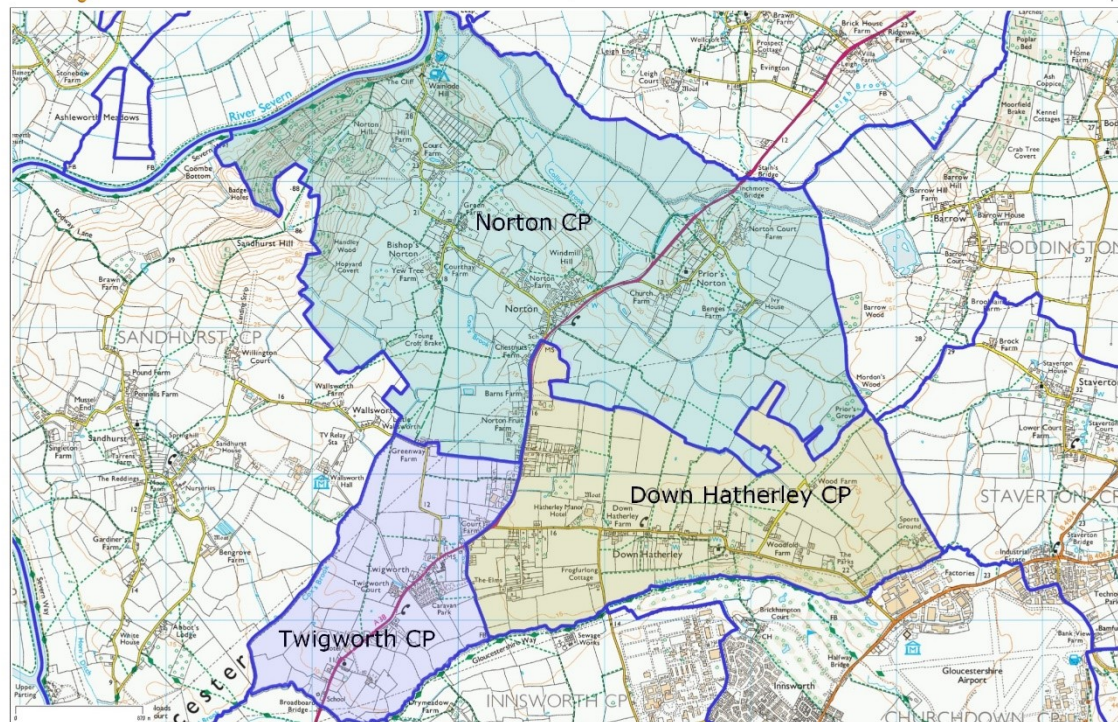
The Area

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ParishOnline

The three parishes

Norton CP 



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5. The three parishes of Down Hatherley, Norton and Twigworth lie north of Gloucester in the Severn Vale, in the borough of Tewkesbury. The parishes are distinctly rural in appearance and character covering an area of over 1,300ha with a population of 1,162 (Census, 2011). It is an attractive area with important landscapes, vistas and natural features.
6. There are strong constraints on planning and development in the area. Much of the area to the east of the A38 in Down Hatherley and Norton form part of the Green Belt. The area's natural environment, notably the River Severn and its tidal nature, adds additional constraints. Indeed, the River Severn influences the capabilities of much of the farmland in the area and throughout history has provided a natural limitation on building development due to the extent of flood water and tidal reach affecting the area. Much of these areas is covered by flood zone and the Landscape Protection Zone designations.
7. The River Severn also influences the area's major roads, with limited east-west accessibility due to the restricted river crossing points. The rural roads are mostly tight, narrow and often twisting, with high hedges, throughout the parishes. The nature of these roads forms part of the area's valued rural character and means that vehicle use of the roads needs careful management, given the shared space with other users including walkers, cyclists and horse riders.
8. The villages have a very limited day to day local services. Twigworth has a small shop, a filling station and a hotel, with its restaurant and bars. The businesses at Twigworth Court enterprise park offers limited local employment. There is one small primary school at Norton and according to Medlin (2017) it is oversubscribed and with limited land for expansion. He states that this in itself limits the likelihood of further development in Norton. Norton has two public houses, a village hall and a sports area. Both villages have a bus route along the A38, which finishes operating in the early evening. Residents rely heavily on cars to access facilities and services outside the parishes in the larger conurbations of Tewkesbury, Cheltenham and Gloucester.

The Plan Evolves

9. The preparation of this NDP has been overseen by a Steering Group of representatives of the three Parish Council areas.
10. The Steering Group comprises an independent chair and vice chair; the three parish council chairs, and other members drawn from the members of the communities of three parish. The steering group has met on a regular basis to coordinate the NDP work including preparing and reviewing the consultation events and consultancy studies. It has kept in regular dialogue with staff at Tewkesbury Borough Council who are responsible for community development and planning. It benefited from the professional input of Gloucestershire Rural Community Council and it commissioned and received professional consultancy advice and inputs. Details of which can be seen in Supplementary Information NDPS1, together with other supporting information and data, at www.nortonparish.com.

The Vision and Objectives

By 2031, Down Hatherley, Norton and Twigworth will have maintained and enhanced its rural environmental quality and improved the wellbeing and quality of life for all of its communities.

11. To achieve this vision, the three parishes will promote and pursue the following strategic objectives:

- i. Maintain and seek to enhance the historic, agricultural, open rural character and environment of this part of the Severn Vale landscape.
- ii. Ensure that new development is sustainable and reflects the needs, nature, character, scale and rural identity of the parishes and their settlements.
- iii. Seek to ensure that flooding and surface water runoff are appropriately managed.
- iv. Promote a balanced and intelligently managed use of the local road network, which provides accessibility for all without creating undue traffic impacts and congestion.
- v. Support and enhance the rural economy.
- vi. Enhance community services and facilities.

NDP Detailed Objectives

12. To support the delivery of our NDP vision we have defined the following detailed thematic objectives:

Environmental Objectives

- Safeguarding the rural and agricultural character and identity of the three parishes.
- Maintaining the valued openness of the landscape, key public viewpoints and the A38 corridor.
- Maintaining the Green Belt to prevent urban sprawl into the rural parishes.
- Reinforcing and enhancing the established Landscape Protection Zone in Norton parish, and the natural environment generally.

Development objectives

- Supporting limited and proportionate housing development.
 - In the case of Norton:
 - Supporting development on sites within the village settlement boundary subject to detailed design, scale and amenity considerations.
 - An application for development outside the defined settlement boundary would be supported providing they meet criteria as laid down in policy H1.
 - In the case of Twigworth:
 - Supporting development on sites in or near the village settlement boundary, subject to detailed design, scale and amenity considerations.
- Supporting well designed affordable housing provision which integrates well with existing village communities.
- Supporting good quality development that provides a range of housing types and tenure considered essential to the local rural economy.

Flood protection objectives

- Objecting to developments which may displace flood water onto nearby land and increase flood risk to existing occupiers, including from raised ground levels for new developments.
- Ensuring that proven water management features are integral to any new development and installed as priority components at the start of projects.
- Supporting the use of agricultural land for water management.

Transport objectives

- Supporting demand management and congestion relief on the principal A38 road corridor.
- Reducing vehicle speeds where appropriate and promoting highway safety.
- Encouraging sustainable travel modes.
- Supporting improvements to public and community transport, and to provision for cyclists and pedestrians.

Rural economy and tourism objectives

- Supporting the rural and specialist local economic sectors which contribute to the wellbeing and character of the area.
- Supporting development considered essential to the rural economy.
- Engaging with others to enhance appropriate management, protection and recreational use of the River Severn landscape.

Community objectives

- Supporting the improved management and use of community buildings, venues, and meeting places which help meet the needs of the community.
- Promoting the improvement of open spaces, and natural assets of the area that are important and valued.
- Encouraging new and/or additional services and facilities which help to meet identified needs of local people and improve their wellbeing.

13. This NDP has been produced in the context of the National Planning Policy Framework (NPPF, 2012) and the existing statutory development plan for Tewkesbury Borough Council.

Policies

The NDP Landscape Policies

14. Protecting the natural and historic environment of the NDP area is of profound importance to the parishes. A key purpose of preparing this NDP is to ensure that the natural and historic environment assets are fully recognised, appreciated, and fully protected from harmful development. Furthermore, beyond simply protecting these assets this NDP seeks to encourage projects and initiatives which contribute to and enhance the natural and local environment. (NPPF, 2012, para 109).

15. The NDP has assessed and analysed the following environmental components:

- i. Landscape and countryside including, the Landscape Protection zone.
- ii. Nature, ecology and biodiversity.
- iii. Historic environment.

16. These three components play a key role in developing the policies of this NDP.

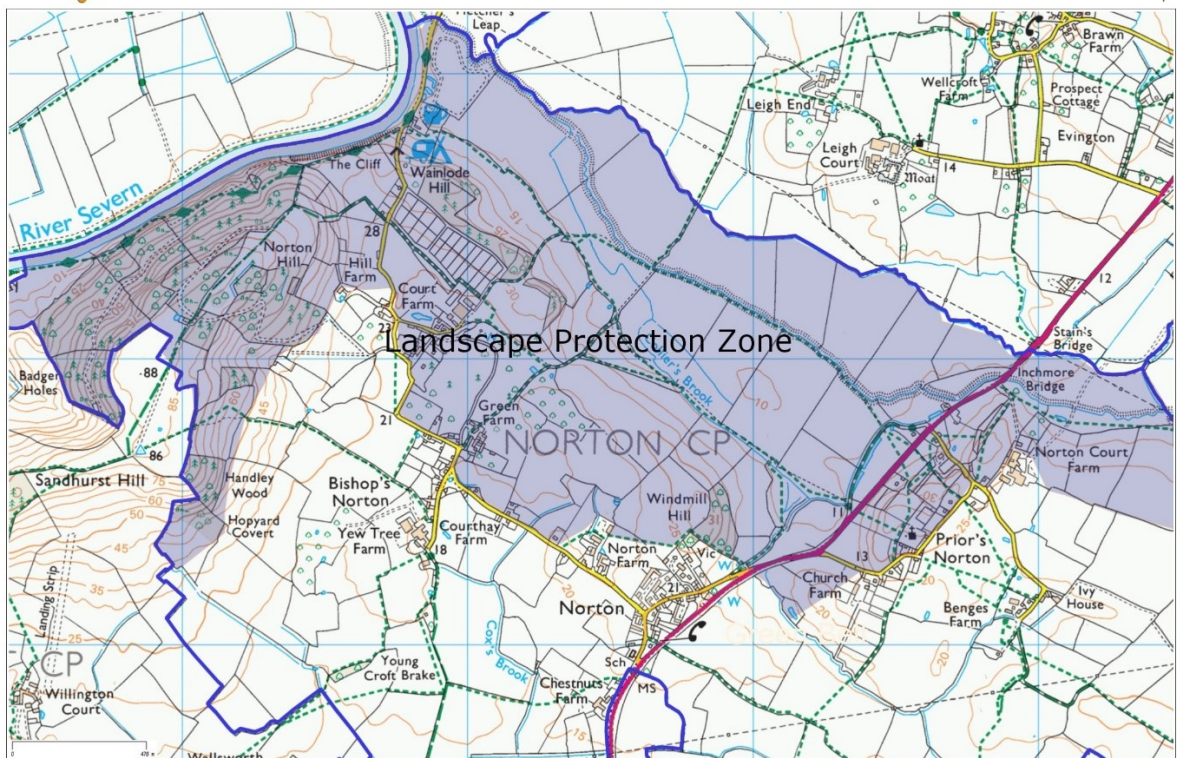
17. The Landscape Protection Zone (LPZ) lies to the north of Wainlode Lane in the Village of Norton and embraces Norton Hill to the west and the River Severn. Full definition is provided in Policy LND3 of the TBCLP to 2011. This policy states that development will only be supported where it does not impact on the ecology, water environment or landscape quality of the Landscape Protection Zone. There are a number of important landscape features and viewpoints, which have been identified in this Plan as requiring particular protection in the consideration of development proposals.
18. The Joint Core Strategy and saved Local Plan include further policies to protect the landscape, ecology and water environment in the open countryside. The consultation on this Plan has identified some particular features and vistas which are valued by the community and where particular care will be taken to prevent harm from intrusive development.
19. It is important that new landscaping adds to biodiversity and is consistent with the local ecosystem. This can be aided by incorporating landscaping containing native species.

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The Landscape Protection Zone - in relation to the NDP area

Norton CP



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The LPZ in the parish of Norton

Policy E1. Landscape Protection Zone

Development in the Landscape Protection Zone (LPZ) must comply with Local Plan policy LND3 of the Tewksbury Borough Local Plan to 2011 (or any subsequent alternative policy relating to the LPZ). The need to protect the landscape character in the LPZ in general will be taken into account in the consideration of development proposals. The following key landscape features and views have been identified as some of the important elements for protection from harm from intrusive development:

- The wooded hillside of Sandhurst and Norton Hill, which frames the view west from the village of Norton.
- The Green core village area in Norton, which retains an integrity as an unspoilt residential cluster with surrounding green space, in the settlement of Bishop's Norton.
- Riverside meadows, which are characteristic elements of the Severn Vale and provide an important function in the flood plain.
- Field boundary hedges providing an important landscape feature and a functional part of the agricultural landscape.
- Traditional and restored orchards, which help conserve old fruit varieties, and retain a characteristic part of the landscape's vintage.
- Direct view to Gloucester Cathedral at the A38 southerly junction with Norton. This is an important part of Norton's context, keeping a reference to the distant landmark of the Cathedral.
- Views from Sandhurst Hill and Wainlode Hill provide a sense of elevation with panoramic views, including directly onto the River Severn and Vale, and beyond to the Forest of Dean and Wales.
- Open views east to the elevated St Mary's Church at Prior's Norton, known as the disappearing church due to the changing perspective when driving north along the A38.

Policy E2: Landscape protection in open countryside

Development in the open countryside, outside of settlements shall be in accordance with strategic development plan policies in the Joint Core Strategy, saved Local Plan and any subsequent relevant development plan policies, relating to the protection of the visual amenities in the landscape, ecology and water environment. The following vistas and landscape features have been identified as some of the important elements for protection from harm from intrusive development:

- Views as identified on Maps 2 and 4.
- The enclosed tree-lined drive to Wallsworth Hall.
- The openness of parts of the Twigworth A38 corridor allowing an appreciation of the Vale landscape and Twigworth's context in the Vale.

- Field boundary hedges throughout the terrain of the three parishes.
- Traditional and restored orchards.
- St Mary's Church and its Glebe field setting.
- Open green spaces between the built component of dispersed settlement pattern help keep a sense of undeveloped and rural character.
- Ridge and furrow is prominent in certain agricultural fields adjacent to Down Hatherley Lane and Frog Furlong Lane, allowing this historic landscape feature to be appreciated.
- Field boundary hedges throughout the terrain of the three parishes, providing an important landscape feature and a functional part of the agricultural landscape.

Policy E3: Landscape and new developments

New planting of trees and hedgerows shall incorporate a majority of native species

Community Action Point

To support these Landscape policies, the Parish Council will:

- Comment on Planning applications by assessing proposals against the NDP policies.
- Work with landowners and stakeholders to protect hedgerows, trees, verges and other important landscape features from loss or damage.
- Encourage the restoration and creation of orchards and the protection of the ridge and furrow topography.
- Parishes seek to protect and enhance the environment within the LPZ and the open countryside wherever possible. It will encourage conservation and related projects for the enjoyment of local people, visitors and future generations.
- In order to reinforce the above policies this NDP, through the Parish Councils, will encourage developers to take up the Building with Nature benchmark (GWT, 2017) which sets the standards for high quality green infrastructure in the county. The Building with Nature standards ensure new development is better for water management, public safety and the health and wellbeing of individuals and communities, as well as creating space for nature in existing and new development

Preserving the Historic Environment

The local environment is an important historic environment containing a wealth of designated and non-designated heritage assets. A strong framework of national guidance in the NPPF and local development policies protects this environment.



A traditional orchard in Norton

Protecting the Green Belt land of the parishes

20. The protection of Green Belt land is of great importance to the three parishes. The openness and permanence of the Green Belt land in the parishes is critical for a number of reasons set out in the five purposes defined in the NPPF (NPPF, 2012. para 80).
21. The Green Belt is critical to maintain the distinctive character of our three villages and in preventing the unrestricted sprawl of the urban areas. The panoramic views of the open countryside, especially from the A38 trunk road, is one of the key features identified by contributors to the initial consultation in the preparation of this NDP (NDPS8).
22. The green belt in the parishes of Down Hatherley and Norton make a significant contribution to green belt purposes (JCS GBA, 2011).

23. Maintaining the Green Belt in the parishes is critical in the wider strategy of directing new development to urban brownfield sites of the urban areas, the regeneration of which will be highly sustainable and deliver widespread benefits.

Housing development

Planning for sustainable housing development

The case

24. The parishes of Down Hatherley, Norton and Twigworth are distinctly rural and special places. To maintain the special character of the parishes and to meet the objectives of this plan, a careful and measured approach to new housing development is required. This chapter sets out that approach for the NDP area in the period to 2031.
25. It has been founded on the principles of sustainable development set out in the NPPF (2012) and has been informed by the levels of growth established through the Examination of the Joint Core Strategy.
26. The objectively assessed need for the Tewkesbury Borough area indicates that 9,900 homes needed to be provided during period 2011-2031. It is against this figure that the 5-year housing land supply is calculated. Consequently, it is on that basis that this NDP's housing needs have been considered. At the strategic level, Tewkesbury borough has agreed to contribute to fulfilling unmet need from Cheltenham and Gloucester under the duty to cooperate as set out in Joint Core Strategy (JCS,2017) Policy SP2.
27. Core Strategy policy A1 provides for a significant urban extension at Innsworth and Twigworth. Outline planning permission ref; 15/01149/OUT for the 725 dwellings, primary school, community facilities and associated infrastructure was granted in December 2017 on part of this area. Furthermore, Core Strategy policy SD5 removes an adjacent area of land from the green belt to create a "Safeguarded Area" allowing an option for development in a future review of the Core Strategy. Map JCSMap1 shows the Twigworth Strategic Allocation and Safeguarded Areas under the JCS (2017) and JCSMap2 shows the Indicative allocation for Twigworth. These maps are extracted from the JCS Policies Maps Adopted Version 11 (December 2017). Both maps can be viewed in Appendix 1.
28. As a Service Village, this NDP recognises that Norton will need to provide a share of the new homes that the Statutory Development Plan identifies.
29. An indicative housing disaggregation process was undertaken for the Tewkesbury Borough Plan Draft Policies and Sites Options consultation document (BPDP, February 2015). The methodology followed the requirements in the then emerging JCS (Policy SP2) and derived figures for each Service Village proportional to their size and function and also reflecting their proximity and accessibility to Cheltenham and Gloucester. Policy SP2

also took into account the environmental, economic and social impacts. These matters were taken into account in the preparation of this NDP.

30. The indicative level of development in Norton as indicated in the Background papers of the Tewkesbury Borough Plan was 13 (from November 2014) (Appendix D of 'Approach to Rural Sites', TBC, 2015.NB. In January 2017 the Service village status was removed from Twigworth.)
31. It is important to recognise that since this number was allocated to Norton there has already been a supply of consented sites in the parish. These exceed the indicative service village requirement and this is taken into account within this NDP. To date these amounts to a total of 53 houses which is 40 above the indicative level. It is worth noting that as part of the its S106 agreement development 16/01172/FUL provides land for school use. This and other developments post November 2014 are indicated on map M1.
32. Equally, it is also important to recognise that any figures are not 'targets' that would set a ceiling on genuinely sustainable development. That said the inherently rural nature of the parishes, their very limited services and the small size of their villages and populations, does naturally constrain the capacity for growth without compromising environmental factors and sustainability.
33. Whilst accepting that numbers may change and that any number is not a cap, the general growth is expected to be limited and restrained, to maintain the general character of the area and the scale, role and functions of its settlements. The NDP housing policy approach has been framed in this context.

The NDP policies for new housing

34. The NDP seeks to plan positively for sustainable development in the parishes and to accommodate proportionate levels of housing growth. The NDP seeks to direct planned growth to the most sustainable locations and to sites that have the lowest environmental impact. Put simply, those locations are within the functional form of the larger settlements with some service provision and public transport accessibility.
35. To achieve this, our NDP proposes a differentiated approach that reflects the materially different planning circumstances in the three main villages and the open countryside outside the settlements.
36. For Norton, a 'settlement boundary' policy approach is proposed, which will define the area within which growth will be contained and it will also serve to protect the open countryside and public views beyond.
37. Twigworth being a linear settlement along the A38 corridor affording panoramic public views of the surrounding landscapes, the NDP uses the submitted settlement boundary around the denser part of the village close to Orchard Park and the village shop. The settlement boundary will be used as

a reference point for judging any growth proposals against specified policy criteria.

38. As Down Hatherley has not been given the status of service village and as Twigworth service village status has been removed, there are no indicative housing allocations made under the Tewkesbury Borough Plan. This does not exclude these two villages from any development especially if it's in the public interest. However, the NDP expects such developments to be limited given the recognised sustainability issues and the Green Belt designation of much of the parishes.
39. The Core Strategy and Local Plan allow certain housing development as an exception in the open rural area including green belt beyond the settlement boundary. This includes some building conversions, development necessary to support agricultural or other essential rural activities and affordable housing to meet local needs.
40. These approaches and the respective policies are set out and explained more fully below.

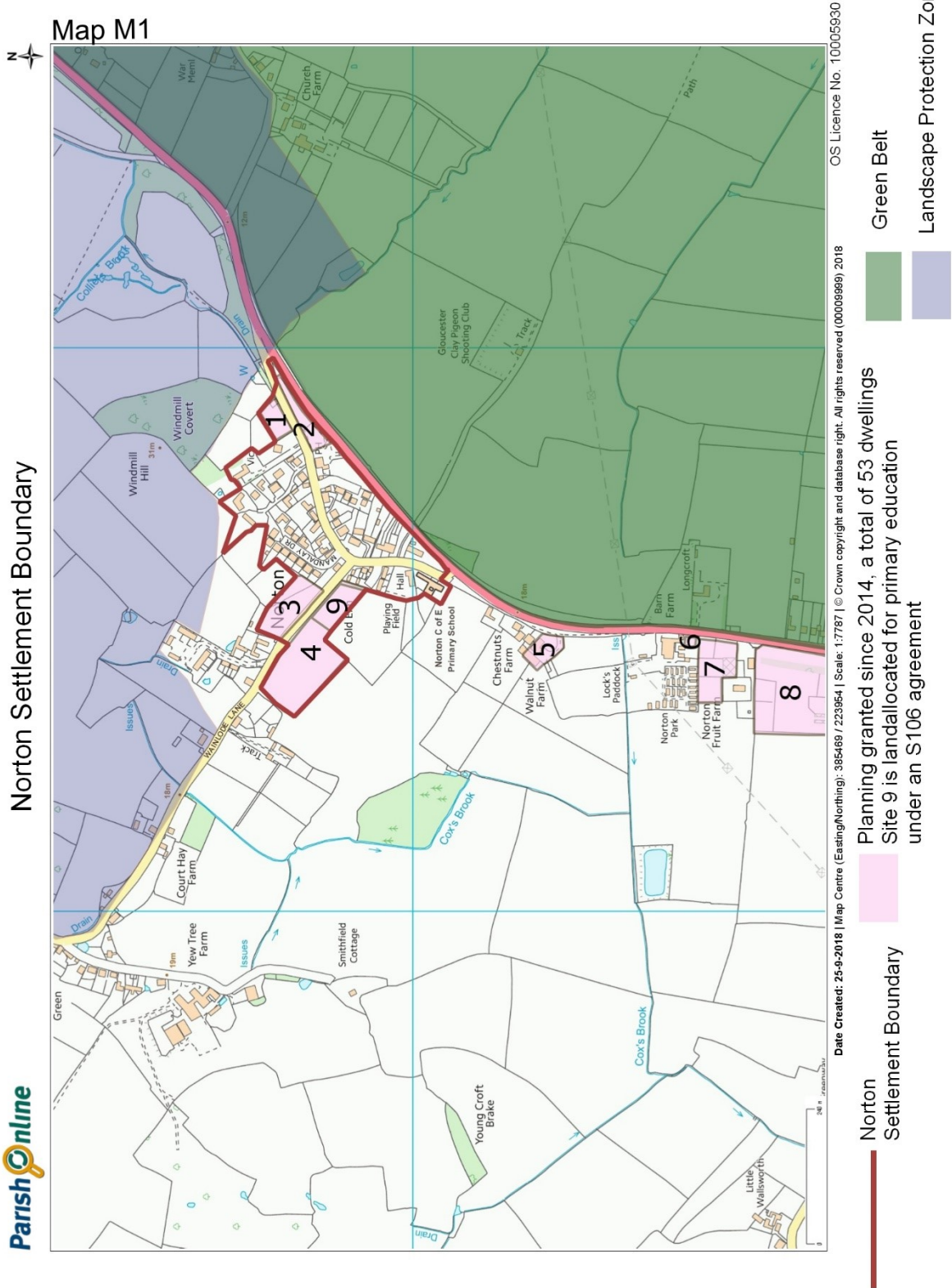
NORTON – New Housing

41. A clear and defensible settlement boundary is established to ensure that growth is directed to the right places in the village and that the countryside is protected from unplanned, sporadic and 'ribbon' development.
42. Since the indicative level of housing has been dramatically exceeded since 2014 limited future growth is envisaged and can be contained within the settlement boundary.
43. The NDP has approached the definition of a settlement boundary for Norton by considering a number of factors, namely:
 - The boundary of the existing Norton (Cold Elm) village settlement with the higher density of housing, outside the Green Belt and the Landscape Protection Zone.
 - Maintaining the character of the parish and preventing ribbon development merging Norton with neighbouring parishes.
 - The level of growth anticipated and its proportionality with the village size and function.
 - Extant planning permissions.
 - Landscape character.
 - Close to amenities such as the public house, village hall, primary school and recreational facilities.
 - Key public views, as identified in consultation with landscape assessment consultant Toby Jones associates and local consultations.
 - Roads and footpaths.
44. The NPPF (2014) section 11 paragraph 60 and 61 state that local planning policies and decisions should not restrict design and innovation but it is proper to promote or reinforce local distinctiveness and address the

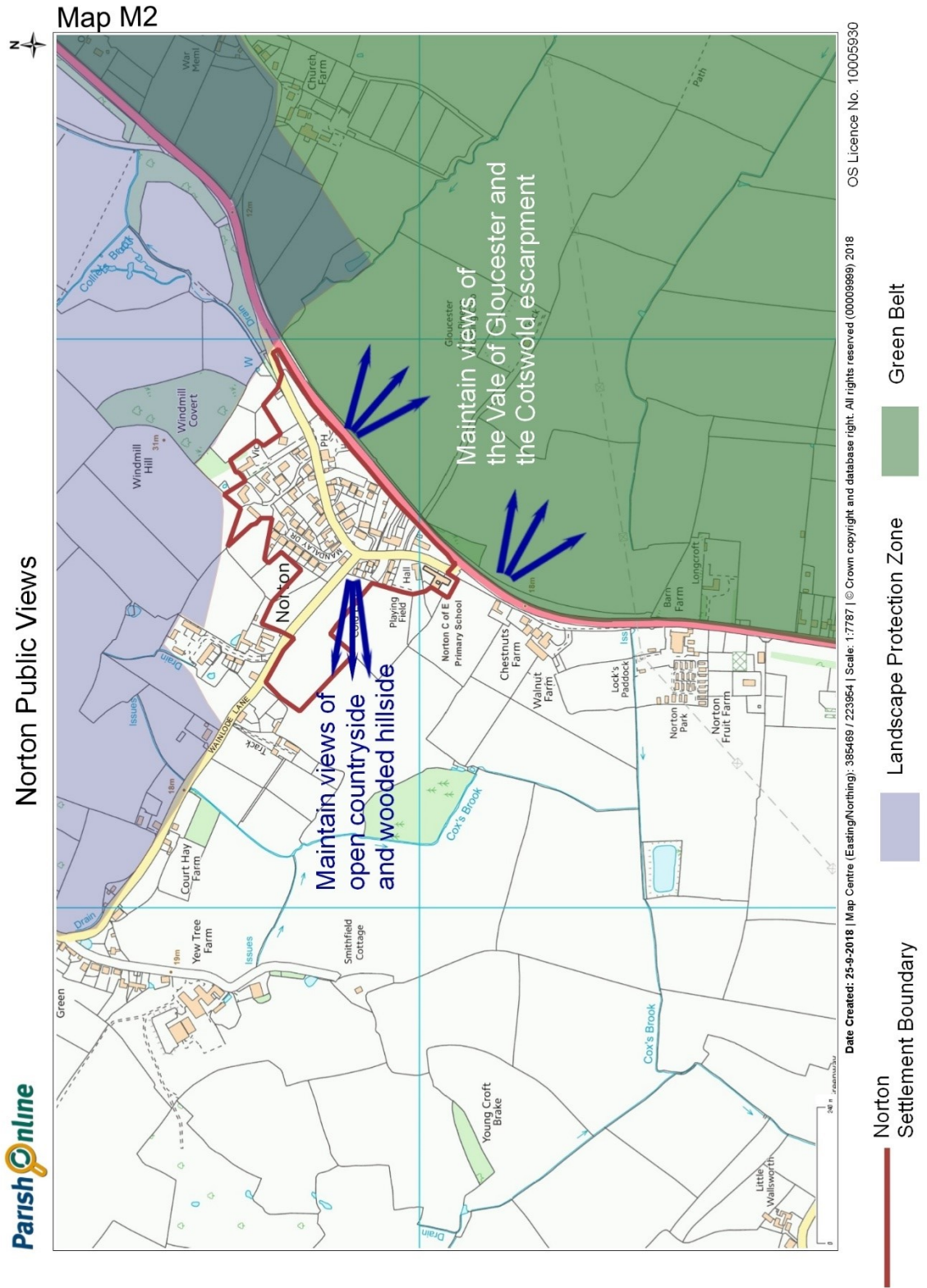
integration into the natural, built and historic environment. Also, Local Plan Policy LND4 (now SD6) states that proposals for development in rural areas, regard will be given to protect the character and appearance of the rural landscape.

45. In order to protect the identity and character of the Norton village settlement and preserve the rural environment and countryside, major growth will be directed to the most sustainable locations i.e. within the settlement boundary. The settlement boundary map for Norton is labelled M1 and the important public views can be seen in M2.

Down Hatherley, Norton and Twigworth NDP



Down Hatherley, Norton and Twigworth NDP

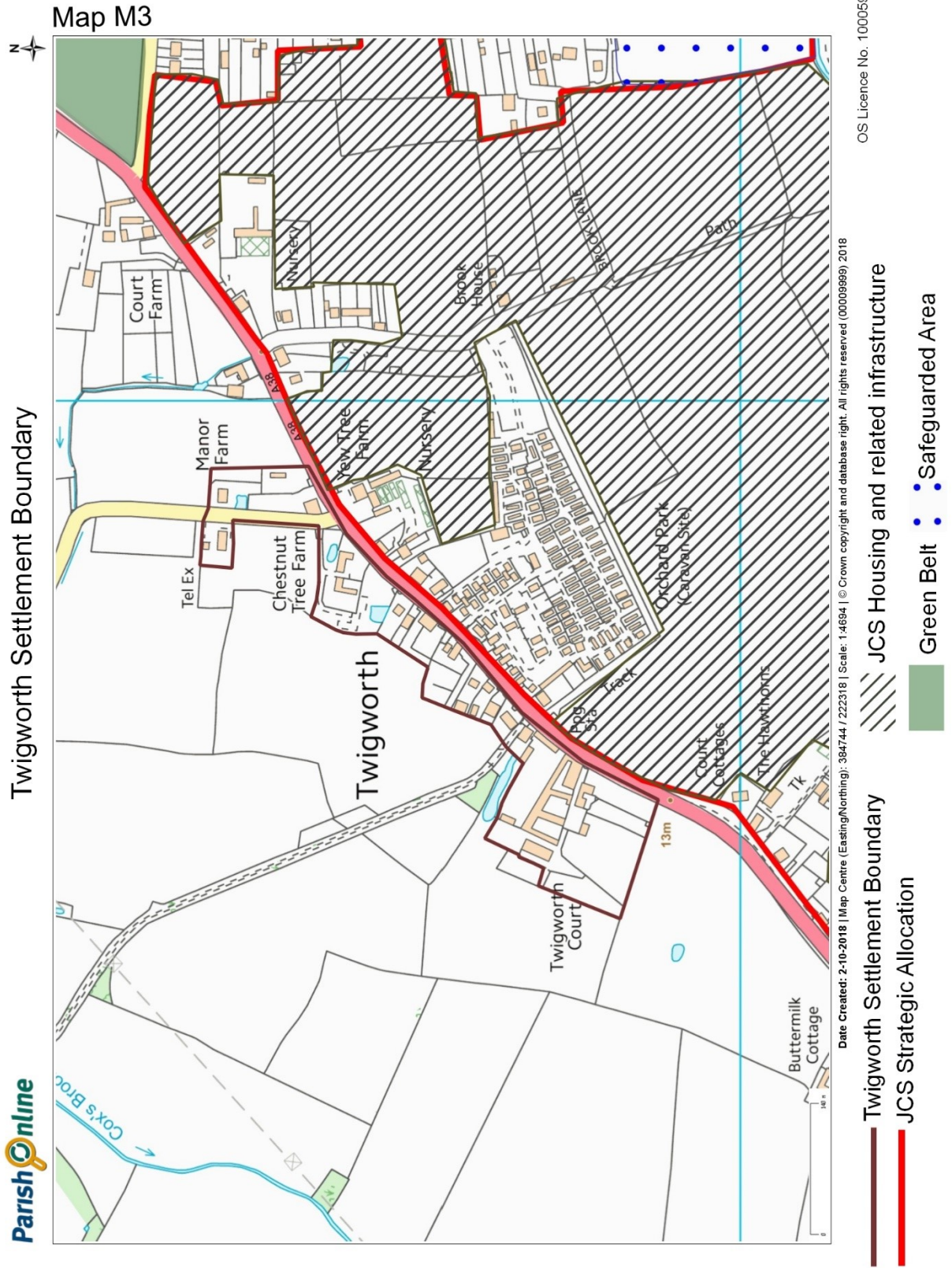


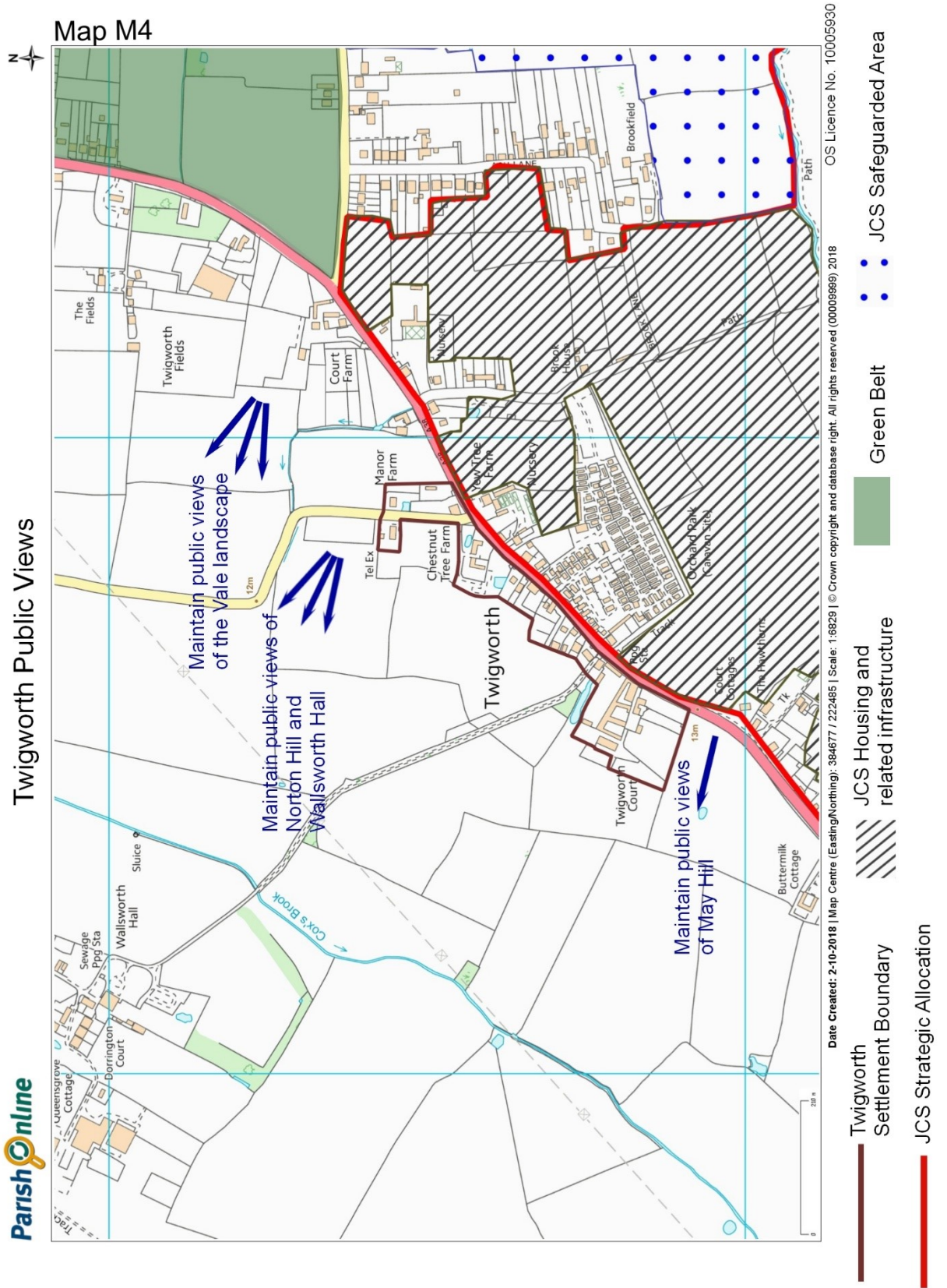
TWIGWORTH – Settlement boundary

46. Twigworth village has not previously had a defined settlement boundary for planning purposes, as no growth had been planned in the village. However, in the new planning era, some modest growth is likely, although the precise scale of that growth is still to be determined. There is a small existing portfolio of extant permissions or commitments to contribute to planned growth.
47. Rather than define a settlement boundary to contain all new development, this NDP defines a settlement boundary around the area of highest density, near the village shop and away from areas recognised as at risk of flooding or exceeding field capacity. This is intended to focus the assessment of future growth proposals to this area of Twigworth. Whilst some development can be accommodated within it, it is likely that some growth will be required alongside these boundaries.
48. The Twigworth settlement boundary is shown on the plan M3 and important public views in M4.
49. Such an approach, when considered alongside the criteria detailed in policy H2, will ensure that growth is directed to the best locations and is of a type that is appropriate for Twigworth and in line with the vision and objectives of this NDP. The approach also allows for the NDP (and development management decision making) to flex and adjust to meet differing growth levels that may be determined through the Statutory Development Plan processes and the outcome of any planning application/appeal.
50. A matter of profound importance to Twigworth is that, whatever growth level is ultimately determined, it should be delivered steadily over the plan's period through a series of modest developments and not on a single large site delivered in a short space of time. This NDP proposes an organic, piece by piece, approach to sustainable growth in Twigworth in line with the available infrastructure.

DOWN HATHERLEY

51. No new housing growth is planned in Down Hatherley parish. Accordingly, it is not considered necessary to define a settlement boundary in order to direct and control new housing development. Given the poor sustainability and the Green Belt designation over the majority of the parish, it is not necessary for this NDP to replicate the national and Development Plan policies that preclude new housing development in this area.





Policy H1

The following are criteria which will be applied in the consideration of planning applications for housing development in Norton parish. Other criteria and policies may also be relevant including policies in this Plan, the Joint Core Strategy (JCS,2017)) and the Local Plan.

The application:

- i. development should be within the village settlement boundary as defined on Map M1. Outside of the settlement boundary development will only be allowed as an exception if it conforms to policies in the Core Strategy or Local Plan.
- ii. achieves a standard of design and appearance of an appropriate density, scale and layout, which is respectful of its surroundings, the Norton village vernacular and materials, local topography and any heritage assets.
- iii. it contributes to a sense of village character, both in the buildings and spaces themselves and in the way in which they integrate with their surroundings, including appropriate landscaping, biodiversity enhancement and amenity space.
- iv. it includes proposals, wherever possible and reasonable, to provide safe and well-designed access by foot and cycle to local community services and to public transport services.
- v. it will not result in any unreasonable loss of amenity to adjoining neighbouring properties.
- vi. it includes safe vehicular access and appropriate parking taking into account guidance in the 'Gloucestershire Manual for Streets' or similar document to serve the needs. Expansive unbroken areas of hard surface should be avoided where possible.

Policy H2

The following are criteria which will be applied in the consideration of planning applications for housing development in Twigworth parish. Other criteria and policies may also be relevant including policies in this Plan, the Joint Core Strategy and the Local Plan.

The application:

- i. is within or immediately adjacent to Twigworth's settlement boundary and forms a logical extension to the settlement form, without appearing as an unduly harmful encroachment into the countryside.
- ii. achieves a standard of design and appearance of an appropriate density, scale and layout, which is respectful of its surroundings, the Twigworth village vernacular and materials, local topography and any heritage assets.
- iii. includes proposals, wherever possible and reasonable, to provide safe and well-designed access by foot and cycle to local community services and to public transport services.
- iv. it includes a safe vehicular access and appropriate parking taking into account guidance in the 'Gloucestershire Manual for Streets' or similar document to serve the needs. Expansive unbroken areas of hard surface should be avoided where possible.
- v. where the residual cumulative impact of the development on the transport system is not considered to be harmful to traffic safety and will not result in any unreasonable loss of amenity to existing residential properties or other occupiers.

Community Action Point - Design Statement

New development or extensions to existing buildings in the NDP area should:

- Demonstrate design quality and sensitivity to the existing vernacular details of the rural village.
- Preserve the separate identities of the villages within this plan.
- Developments of multiple dwellings should generally adopt a farmstead cluster form, avoiding linear forms, which may appear as undesirable 'ribbon development' and also harm valued public views.

52. The NDP should not restrict the sensitive extension of existing dwellings or the addition of sensitively designed outbuildings that would add to residents' enjoyment of their own home.

Affordable Housing

53. The NDP fully supports an appropriate amount of affordable housing within its area, in perpetuity, as laid down in policy H1 and H2. In order to meet objectively identified housing need an element of affordable housing on qualifying sites will be sought as part of any new housing developments in accordance with the requirements of Tewkesbury Borough Council's adopted Development Plan policies. Affordable housing delivery should be linked to local needs including the type of housing provided.

Mobile homes, Chalet and Camping Sites

54. The NDP area includes a number of sites that accommodate camping, mobile caravans, static units and chalets. The static units and chalets are used for either residential or holiday accommodation.

55. Seasonal camping and caravanning facilities can play an important part in the rural economy and in promoting enjoyment of the countryside for recreational purposes.

56. Residential accommodation through the use of chalets or static units provide more affordable family homes or residences to those families that wish to down size.

Transport and Accessibility

57. The Parishes wish to create a road network throughout the three parishes which is accessible, safe for all users and environmentally sound.

58. The major road serving the three parishes is the A38 linking Gloucester and Tewkesbury. A capillary of rural roads serves the A38 taking commuters and other travellers to Gloucester, Cheltenham, Tewkesbury and beyond. It also serves as a major relief route when problems arise on the M5 and the M50.
59. Properties in each of the parishes line the A38. Access to and from these properties is often difficult.
60. The roads are part of people's immediate residential environment. Traffic, especially traffic congestion has a detrimental effect on air quality, (Hitchcock et al, 2014) and the health of people.
61. In addition, the roads must be regarded as shared space where motor vehicles share the use with pedestrians, horse riders and cyclists. All proposed developments in the area, which have implications for use of the rural roads, must not constrain the safe use of the roads by these non-car users.



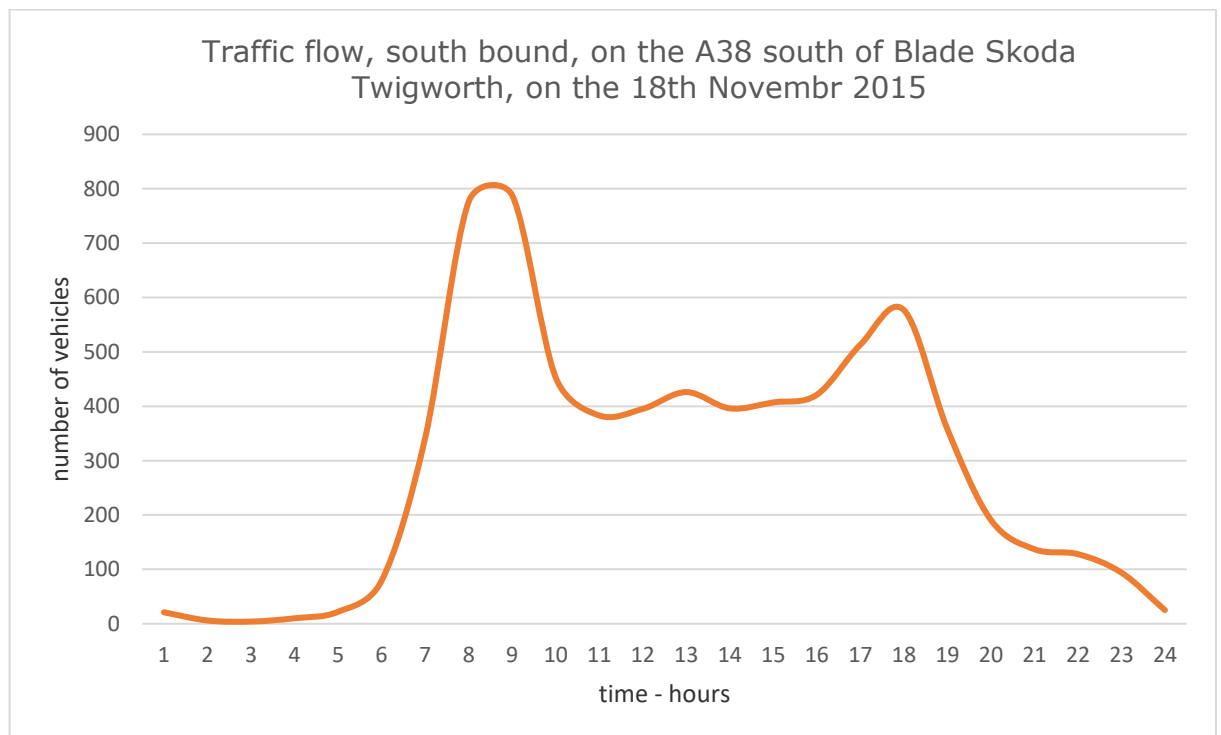
62. To quantify the traffic levels on the parishes' roads the NDP committee commissioned Rob Snijders to carry out traffic surveys on the A38 and the side roads in November 2015, details are found in NDPS4. A summary of the traffic flow data collected for the A38 south of Twigworth is shown below:

Down Hatherley, Norton and Twigworth NDP

Time Period	Traffic figures - in both directions
Typical Weekday AM Peak 07:00 to 08:00 hrs	1,422
Typical Weekday PM Peak 16:00 to 17:00 hrs	1,239
Typical Weekday 24 hours	13,329
Typical Saturday Peak Hour 12:00 to 13:00 hrs	909
Typical Saturday 24 hours	9,748
Typical Sunday Peak Hour 12:00 to 13:00 hrs	834
Typical Sunday 24 hours	7,443

(from Rob Snijders 2015)

The traffic flow throughout the day is illustrated in the graph below and illustrates the impact on the Longford roundabout.



from Rob Snijders 2015

63. The JCS Transport Strategy Evidence base (TSE, 2017) supports the anecdotal evidence put forward by residents that:

'The A38 at Longford roundabout experiences considerable vehicle queues and delays under existing observed weekday peak hour traffic conditions'

It goes on to report that even with traffic lights and the latest modelling techniques, the roundabout will operate at over capacity.

64. The Planning practice guidance from the Department of Communities and Local Government (PP, 2014) state that travel plans, transport assessments and statements positively contribute to:
- encouraging sustainable travel
 - lessening traffic generation and its detrimental impacts
 - reducing carbon emissions and climate impacts
 - creating accessible, connected, inclusive communities
 - improving health outcomes and quality of life
 - improving road safety
 - reducing the need for new development to increase existing road capacity or provide new roads.
65. These points were fundamental in developing the key areas for the NDP objectives.
66. Roads have an impact on the appearance of the built and natural environment. Road side advertisements can have a negative impact on the environment and should be subject to control (NPPF, 2012. para 67). They also risk public safety by obstructing visibility. Other safety risks to road users are:
- potholes and other defects on the road surface and
 - hedgerows and trees that line the roads.

Key areas to consider

Accessibility

The area's road network provides accessibility for all types of user. Opportunities to reduce congestion and to enhance freedom of movement through better public transport should be identified and acted upon.

People needing community or public transport have better access to these services.

Environmental quality

The area's road network does not degrade people's quality of life through speeding traffic, congestion and pollution.

Safety for all road users

Vehicle traffic does not impede or endanger other road users such as pedestrians, cyclists and horse riders.

Safety and accessibility are substantially improved for pedestrians, cyclists and horse riders.

Community action point 1 – Local application of policies and modelling

Examine and give local interpretation on transport assessments, statements and travel plans, when available, for new developments. Offer local advice on all developments and put pressure on relevant authorities to ensure that the traffic modelling is current.

Community action point 2 - Managing traffic speed

With growing traffic flows safety concerns are paramount. Where there are concerns, the parish council should arrange to monitor traffic speeds and if necessary representations will be made to the relevant highway authority requesting the consideration of the need for speed management measures.

Community action point 3 – Safety for all users

Safety of road users is paramount and the parish council will play a role in monitoring road surfaces and report problems to the relevant authority. Hedges and trees are the responsibility of the land owners (Highways, 1980. section 154). The NDP will encourage parishioners either as individuals or through their council to monitor and report problems which affect those who use the roads and pathways, including intrusive road side advertisements.

Flooding

67. The Parishes wish to ensure that flooding and surface water runoff are appropriately managed.

The Case

68. The NDP area suffered severely during the 2007 flood, Twigworth being low lying and close to the River Severn. Brooks that drain the area pass through the village and will back up and spill on to the land when the Severn is in flood. The Severn is tidal past the village of Norton which can exacerbate the problem when large quantities of water come down the river.

69. There is concern, especially in Twigworth that development in the area will increase flood risks to people's properties so adversely that it will affect their day to day lives. Local knowledge has a place: "we're the ones with the experience of flooding, why aren't the 'experts' interested in what we know?" (Whatmore, S., 2016). It is the residents that suffer the consequence and are subjected to increased insurance premiums.

70. The NDP recognises these concerns and that local people have a role in protecting their property. The evidence may be anecdotal but when experts disagree (Cluckie vs Thomas, 2017) the concerns grow. The Environment Agency is now recognising this as well: "it will be part of our work to build a better flood information service" (EA e-mail. 2017).



71. Flood prevention is a significant planning issue in the area. Development proposals will be carefully assessed in relation to national guidance in the NPPF and local strategic development policies.
72. Another concern is the feasibility of using Sustainable Urban Drainage Systems (SUDS)¹ in vulnerable sites. The UK Groundwater Forum (UKF) reports that “The infiltration rate must be considered in conjunction with the water table elevation which for most schemes should be at least 1 m below the base of the SUDS scheme”. Sites being considered for development are subjected to surface water retention after periods of rain and are near the flood plain, suggesting poor permeability and high water table.
73. NPPF (2012), section 10 covers the procedures to adopt when there is proposed development in areas at risk of flooding. The management of surface water including SUDS will be considered in relation to the requirements of the NPPF and various technical guidance by the lead Flood Authority.
74. Background information on flooding in the area can be read in NDPS9² section 3.

POLICY FP1

Demonstrating effectiveness of water holding techniques, their maintenance in perpetuity, and of sewerage capacity.

In cases where sustainable drainage measures require provision of a surface water holding facility, whenever possible these should be part of public open spaces where the public can enjoy safe access to them.

¹ SUDS - is an acronym for Sustainable Urban Drainage Systems

² NDPS9 - is the Neighbourhood Development Plan evidence document relating to “Flood” issues.

Community Action point

The NDP will encourage the adoption of the following objectives when applications are discussed or assessed at local level.

- The parish council will seek guarantees, through the flood prevention agencies that SUDS will be maintained in perpetuity, protecting households from the consequence of poorly located and/or maintained drainage systems.
- The parish council must ensure that these procedures are followed and local interpretation given to the planning authorities. The parish councils have a role in ensuring that the modelling used in the flood risk assessment is up to date.
- Promote flood prevention through resisting proposed developments which are likely to displace flood water onto nearby land and roads.
- Ensure any car-parks which are being constructed or repaired at community, business and other public venues should incorporate the latest permeable surfaces or other sustainable drainage features which shall retain their full permeable or drainage capability for the design life of the car park.
- Ensure that flood protection, water management and water landscaping is integral to any new building development, and to be regarded as priorities at the planning stage.
- Ensure that any elevation of land or buildings in a new development does not cause detriment to existing properties through increased risk of fluvial and/or pluvial flooding.
- Support the use of agricultural and amenity land for water management, and ensure that water storage creates positive safe environmental features and enhances local features.
- Support initiatives to alleviate fluvial flooding north of Gloucester.
- Support measures taken by neighbouring communities, upstream of our smaller rivers and streams, to manage run-off to prevent increased risk downstream, and where possible apply remedies (e.g. retrofitted ponds, application of more permeable materials).

Rural economy and other development

Economic profile

75. The economic health of the three parishes is in many ways linked to the larger areas of employment such as the City of Gloucester and the towns of Cheltenham and Tewkesbury. Out of the 1142 people in employment in the area only 84 were working from home (Census, 2011). Analysis of data from the same source of those travelling to work, 83% travel by car.

76. The employment statistics as compiled in the 2011 census is detailed in supplementary evidence NDPS6.
77. A summary of the top 54% is shown below.

Type of employment	
Wholesale and retail trade; repair of motor vehicles and motor cycles	15.0%
Human health and social work activities	10.3%
Construction	10.1%
Education	9.7%
Manufacturing	9.2%
	54%

There are limited employment opportunities within the NDP area.

78. Our NDP approach is to recognise the County's *Strategic Economic Plan for Growing Gloucestershire* (gfirstLEP,2014) as the framework within which our NDP will work. We believe that a full range of small enterprises contribute to the vitality and flexibility of the local economy and that businesses within our parishes are an integral part of the local economy and should be encouraged.
79. Small scale, sensitive and appropriate developments which support the rural economy will be supported in principle and assessed on their individual merits in accordance with national guidance and adopted local strategic planning policies.
80. However, there are limitations to development. Defra (2011) reported that:
 'superfast broadband and mobile communications enable rural businesses to reach new markets, to set up more easily from home, to expand, to attract inward investment, and to compete effectively with larger companies by offering niche products'.

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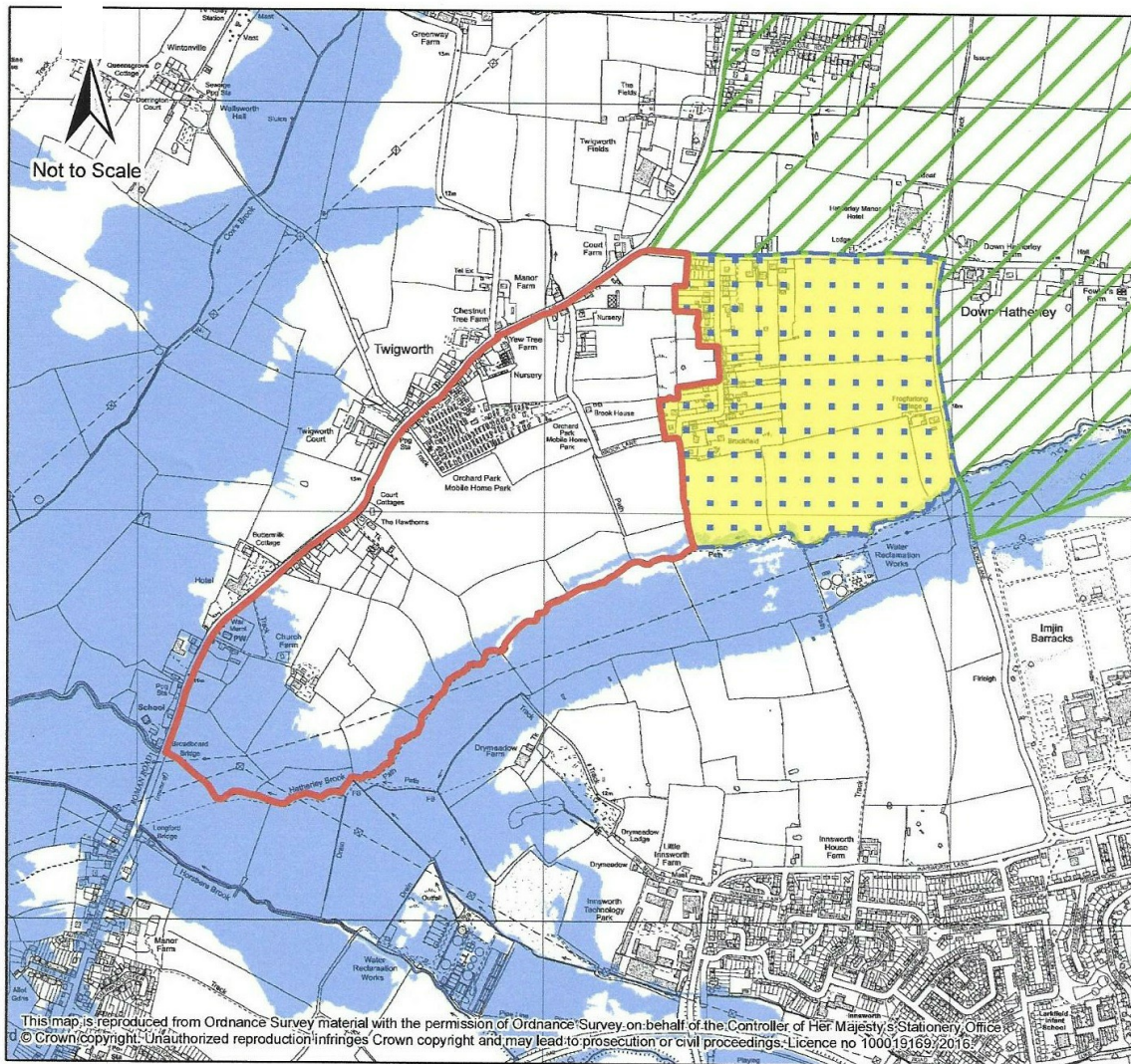
Highways 1980 act section 154 -

<http://www.legislation.gov.uk/ukpga/1980/66/section/154>

Appendix 1.

JCS Map1

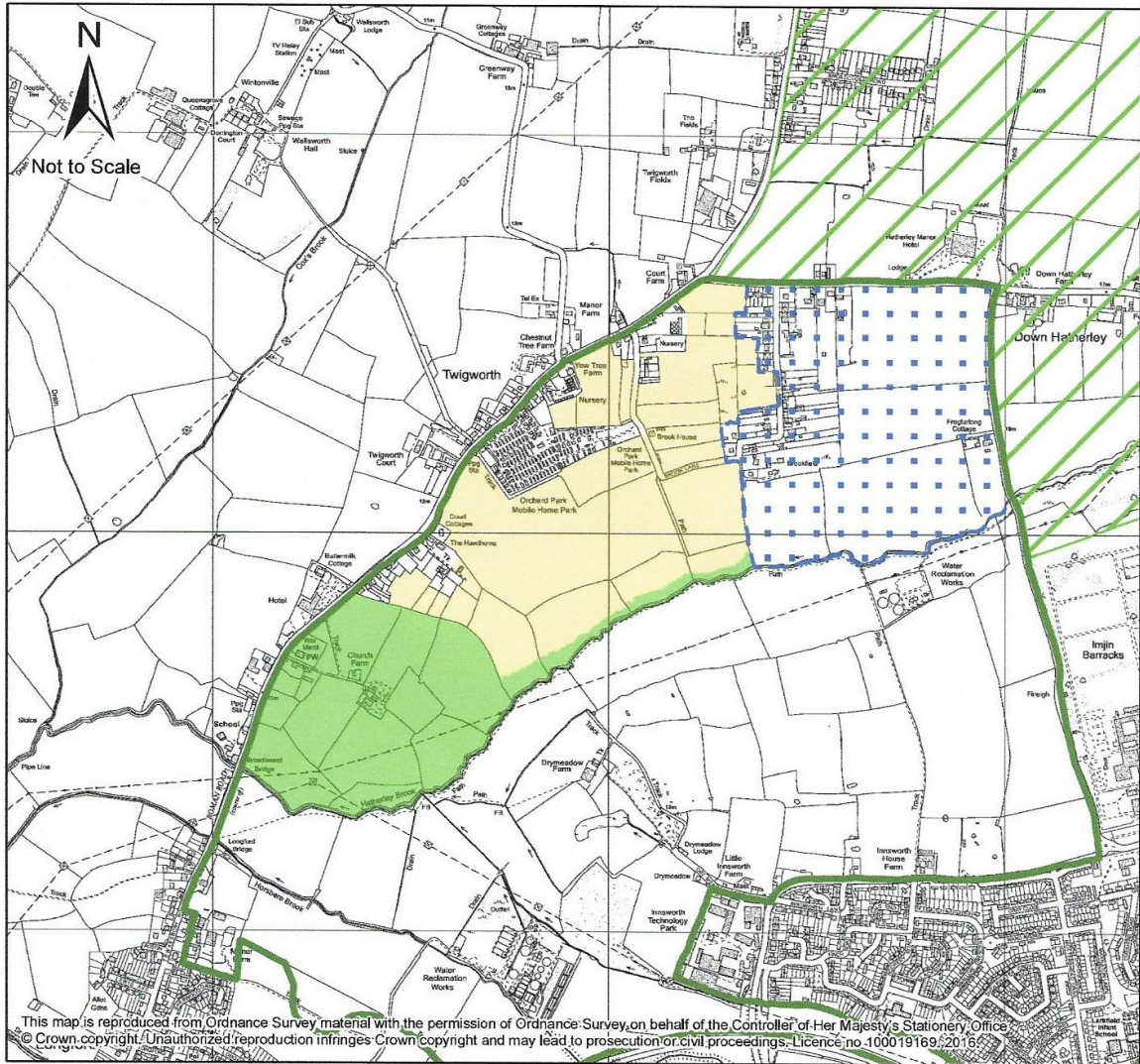
Joint Core Strategy Strategic Allocations - A1a



Key

-  Allocated Site Boundary
-  Safeguarded Area
-  Green Belt (revised)
-  Floodzone 3

Indicative Site Layout A1a -Twigworth Urban Extension



Key

- Housing and related infrastructure
- Green Infrastructure and other supporting infrastructure
- Areas removed from Green Belt
- Green Belt (revised)
- Safeguarded Area