

Tewkesbury Borough Local Plan Speech

Date: 23rd February 2021

Place: Zoom Call

Speaker: Simon Tarling

Introduction

I am speaking on behalf of Gotherington Parish Council and as a resident of Gotherington. I was a member of the Steering Group for the Gotherington Neighbourhood Development Plan during the plan's creation and until recently a Parish Councillor.

I am not a planning expert or lawyer; however, I grew up on Cleeve Hill overlooking the parish; as such I have a first-hand practical knowledge of the area and the challenges and problems of development in the area.

Since some of you will not know the area well, I shall provide some background and context to the parish. I will provide you a short overview of the parish, a short history of development in the area followed specific concerns for the parish including addressing the question of this session:

Issue: Whether the housing allocations and settlement boundaries identified in the TBP are consistent with the provisions of the JCS and justified and whether the site-specific allocation policies are effective.¹

Parish Overview

Gotherington is a rural parish situated to the South East of Tewkesbury and sits at the foot of the Cotswold escarpment under Nottingham Hill and Cleeve Hill.²

The parish is bounded by the Tirlle Brook to the North, and the Dean Brook to the South.

The eastern part of the parish sits inside The Cotswolds Area of Outstanding Natural Beauty, and includes Nottingham Hill, with its promontory hill fort.

The central and western part of the parish sit on flat fertile land of the Severn vale.

Gotherington village itself sits in the centre of the parish and follows the East / West alignment of the parish boundary.

The parish is by design a dark skies parish not wishing to have street lights.³

The parish has one pub, a school and a shop.

¹ From Inquiry Programme

² Appendix 1 – Gotherington Parish Map

³ Section 3.13 of the GNDP

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Development History

If you had walked Nottingham Hill and Cleeve Hill in 1975 you would have seen a valley predominated by fields. Bishops Cleeve the larger village in view with Gotherington about a mile north over the fields. To the East of Bishops Cleeve, you would have seen the village of Woodmancote and to the West a few miles distant, you would have seen the village of Stoke Orchard.

Roll the clock forward to 1985, and you would see that Bishops Cleeve and Woodmancote are no longer separated. The Britannia housing estate has been built on the fields that previously separated them. Woodmancote has become a suburb of Bishops Cleeve.

Roll the clock forward another 10 years to 1995, and you would see that Bishops Cleeve now has expanded to the West and has a bypass. You would also note a large number of houses being built along the new bypass.

Plan Period Overview 2011 - 2031

Roll the clock forward to 2011 and the start of the Gotherington NDP plan period. Shortly after this time the Secretary of State approved the Homelands Farm development, this has led to approximately 1,000 houses being built to the North of Bishops Cleeve in the strategic gap between Bishops Cleeve and Gotherington.

Current View

The Gotherington NDP sets out the nature, direction, policies and principles for development within the parish during the plan period. The plan accommodates three main sites (GNDP1/1, GNDP1/2, GNDP1/3) for development.⁴

At the start of the plan period Gotherington had 448 dwellings. During the creation of the NDP we expected around 75 additional dwellings to be in the plan. However, when the plan was 'made' in September 2017 the indicative number of dwellings had risen to 86. Today, approximately half way through the plan period we have already exceeded the total plan number with 93 additional dwellings. This represents a growth of over 20% during the first half of the plan period.

These figures do not include the recent application and inquiry to build a further 50 houses on 'The Meadow' outside the current settlement boundary in the strategic gap between Bishops Cleeve and Gotherington. The recent application was fuelled by debate over the 5-year land supply, with little weight being given to the NDP or Local plan. Resolving the 5-year land supply calculation is imperative for any planning to be taken seriously. Without a definitive judgement on the 5-year land supply calculation, it becomes open season for developers and land agents to try their hand at building on sites outside the settlement boundary. As seen by the figures above, these 'off-piste' applications are not required as the existing plans and policies are delivering.

⁴ Gotherington Neighbourhood Development Plan

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In Conclusion

Gotherington in the NDP clearly articulated the desire to remain a separate village and to prevent any erosion of the strategic gap between Gotherington and Bishops Cleeve. The parish does not wish to follow the example of Woodmancote and become a suburb of Bishops Cleeve.

Since the start of the plan period in 2011 Gotherington has seen over 20% growth in the number of dwellings. This growth has come at the cost of rural land and has increased traffic and pollution.

Gotherington has demonstrated that by creating a robust neighbourhood development plan in consultation with Tewkesbury Borough, we have been able to exceed the number of dwellings.

Not only has Gotherington delivered the indicative requirement early, we have in fact exceeded the requirement by 7 dwellings. This has been achieved within the NDP's settlement boundary and adhering to the local planning policies. It is therefore the parish's contention that the local policies both in the NDP and the Local Plan are effective and are delivering more than the required number of dwellings.

Planning is, and should be by its very nature, a strategic process. It should not be cast aside at the whim of land agents or developers. Development is more than a simple increase in the number of houses, it is about enhancing communities with all that this means. Paragraph 78 of the NPPF reminds us

*"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities."*⁵

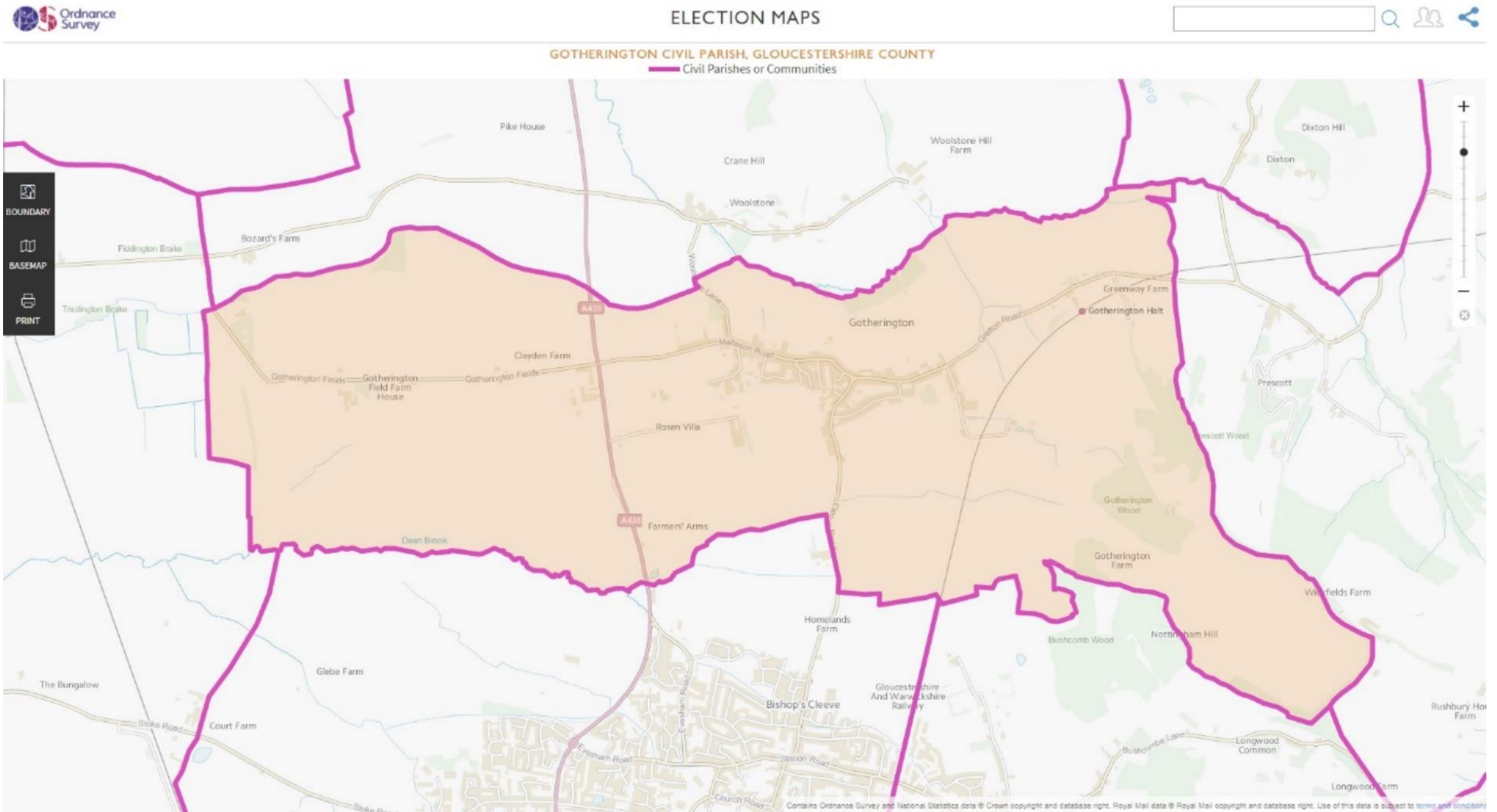
The growth in the number of houses over the last 10 years shows that going 'off piste' and building beyond current settlement boundaries, or in sites which are not allocated in the NDP or Local Plan are not required to meet development targets.

It is the parish's view that based upon the evidence as seen in the increase in dwelling numbers over the first half of the plan period, that the case for additional allocations in Gotherington, or any alteration of the settlement boundary has not been made.

⁵ National Planning Policy Framework

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Appendix 1 – Gotherington Parish Map



Gotherington Housing Growth since 2011

New Developments Agreed by TBC Planning over Past 10 Years	Housing Numbers	Decision Date	Outcome
Whites Farm (09/00605/FUL)	2	Mon 30 Nov 2009	WITHDRAWN
Whites Farm (12/01196/FUL)	1	Tue 07 May 2013	PERMITTED
Woolstone Lane (13/00084/FUL)	1	Wed 17 Apr 2013	PERMITTED
Shutter Lane (14/00432/FUL)	17	Wed 01 Apr 2015	PERMITTED
1 Cleeve Road (15/01344/FUL)	1	Wed 11 May 2016	PERMITTED
59 Gretton Road (16/00336/OUT)	10	Wed 30 Nov 2016	PERMITTED
Shutter Lane Red Roofs (16/01075/FUL)	2	Wed 15 Feb 2017	PERMITTED
Malleson Road (16/00965/OUT)	50	Thu 26 Oct 2017	PERMITTED
Malleson Road (19/00476/FUL)	9	Tue 18 Feb 2020	PERMITTED
Shutter Lane The Butts (20/00202/PIP)	2	Thu 02 Apr 2020	PERMITTED
TOTAL			93

Excludes 'The Meadow' appeal. Accurate up to April 2020

Exam Statement Tuesday 22 February 2021 Cora Patel

As a resident of Gotherington I wish to highlight the pressures faced by our Village from developers. They are seeking to take advantage of the perceived shortfall in Tewkesbury Borough Council's (TBC) 5 year Housing Land Supply, to obtain permission for development over and above what was set out in our Neighbourhood Development Plan (GNDP). This has already impacted on the strategic gap between Gotherington and Bishops Cleeve.

All this is a very pressing and a real concern for Villagers who are seeing their greenspaces rapidly being eroded as well as their identity as a separate village from Bishops Cleeve (BC) threatened.

No Further Erosion of The Strategic Gap

There is a real danger of coalescence between BC and Gotherington unless the strategic gap between the two villages is maintained and protected in the TBP. The recent decision for 50 houses on The Meadow erodes this gap and should be overturned.

The shortest distance between settlement boundaries has reduced from 1,127 metres to 483 metres. In percentage terms this is a 57% loss of the Gap.

We are aware that most of the Gap is in the Comparo land holding. The Omission site "Land North of Homelands" also lies in the strategic Gap.

In light of the above I feel it is imperative that we emphasise at this hearing the policies that seek to protect the Gap between Gotherington and Bishops Cleeve.

The Gap between Gotherington and Bishops Cleeve is covered by policy TB3 LAN3 and 8.14, states that it "identifies that this area (parcels Bish-01 and Goth-01) is overlooked from elevated vantages including national trails, popular viewpoints and the heritage railway, and finds the parcel to be of high visual sensitivity due to its important role in separating Bishops Cleeve from Gotherington"

Some of these national trails (particularly the Ancient Sabrina Way Bridle path) are referred to in printed material and The Heritage Railway States that "The line commands wonderful views of the nearby sleepy hamlets and villages, with outstanding outlooks across to the Malvern Hills and beyond." Gotherington is one of these villages.

Given its location in relation to the AONB the Gap triggers NPPF 172, SD7 and the Cotswold Conservation Board's Management Plan (MP)

In fact, this policy was highlighted in the recent Ashmead Inspector's report (paras 21 and 22)

Which states:

21. The importance of the AONB is enshrined by statute, and paragraph 172 of the National Planning Policy Framework (the Framework) gives great weight to conserving and enhancing landscape and scenic beauty in AONBs. Additionally, Policy SD7 of the JCS requires proposals within the setting of the Cotswolds AONB 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 2018-2023 (MP). Various policies in the NDP also seek to protect the AONB and views into and out of it, particularly those from Nottingham Hill and Cleeve Hill.

22. Policy CE1 of the MP sets out that 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.

For reference, the most important viewpoint at the Ashmead appeal is at Grid Ref: SO978286 on the path between Bushcombe and Gotherington Woods.

The Management Plan also advises against suburbanisation of the agricultural landscape.

If a 50 house development at Ashmead Drive is not suburbanisation, I don't know what is.

Other sites in the village are also being actively marketed for development. Interest from developers has become particularly aggressive of late with letters to landowners in the village asking them to sell. Some of those letters state.....and I quote" TBC currently have a shortfall in their 5-year land supply, therefore there is a very real, but time limited, window of opportunity to benefit from a recent change in policy" (documents to support).

I will submit a link (please copy and paste) to a map showing the sites surrounding the village that are currently at stake / have interest, the extent is quite shocking.

Bishops Cleeve now has the ominous title of the largest village in the country at well over 17,000 inhabitants (as at March 2018) and is now larger than Tewkesbury. The infrastructure, particularly the roads are struggling to cope with this huge increase which has also had a knock- on effect on our village.

Gotherington is not a suitable location for substantial development in the next 5 to 10 years due to the following:

We have just two community buildings

- Our Village Hall only has capacity for 80 people and there is no scope to extend the building. The newly renovated Old Chapel is limited as it only has a floor area of 48m² (for instance, it can only accommodate exercise classes of 8 (which for most organisers is uneconomical) It lacks parking and opens onto the road making it too small and unsafe for children's groups such as Brownies and Cubs so we have no facilities large enough for an all Village meeting, nor any suitable village sites to build one in the future.
- Our playing fields are limited and some of the Football clubs are having to use the playing fields at Swindon Village. The growth of most clubs is constricted by their size, cricket, football ect.
- The main road through our village twists and turns and there are many narrow footpaths where only one person can comfortably walk. There have been several accidents over the last twelve months where cars have mounted the pavement and damaged house boundary walls / fencing. More housing would only exacerbate this real and dangerous problem.
- Access out of the village onto the A435 is an accident black spot with several deaths in recent years. Getting in and out of the village is dangerous, due to the increased commuter traffic from Bishops Cleeve. Current junction improvements by Highways are likely to make the problem worse, rather than improve it.
- Traffic from the village accesses the motorway via Junction 9, which as noted last week is already at overcapacity and further development in our village will exacerbate this.
- The drainage & sewer systems in the village are already inadequate, with frequent flooding on the roads and water flowing from the drains in periods of heavy rain. The last few weeks have seen huge amounts of water flowing down Manor Lane and Gretton / Malleson Road.
- Most of the sites being promoted for development around the village are good quality agricultural land and developing these will make the farms around the village unviable.
- All new sites being promoted are outside the defined village settlement boundary & are not in accordance with the principles outlined with in our GNDP
- There is no employment in the village and no safe access out of the village either by bike or walking, so it is not a sustainable location as all journeys are taken by car.

Further expansion of the village would most likely take the form of large-scale developments, which are effectively housing estates in a rural location. This type of development contradicts the wishes of the village residents in the GNDP, who wished for growth to be via small scale development and infill.

Building housing estates affects the feel and the look of the village, which has historically developed along the arterial roads, with small cul-de-sacs leading off these. The style of the houses would not be in keeping with surrounding houses either. Barton Wilmor argued at the Meadow Appeal that their development would need to have street lighting, or it would be dangerous.

We are a low light village and do not have street lighting in the rest of the village, nor do we wish to have street lighting. This is a clear example of why building housing estates in rural locations is the wrong solution.

Full Weight Should be given to the GNDP

Villagers were shocked to find that on reading the Inspectors report for the Ashmead development, little weight was given to the GNDP. The Inspectors decision to prioritise the perceived 5 YHLS shortfall over the GNDP has had dramatic consequences for Gotherington.

The Principle of “Localism” is an excellent one and one that the village embraced through the completion of its Neighbourhood Development Plan (GNDP)

Changes in legislation are required to give the necessary power to Neighbourhood Development Plans, as having made a Plan that carries no weight after 2 years, through reasons outside the control of the villagers (due to TBC perceived lack of 5-year HLS), undermines the whole principle of “Localism”

We argue that if you look at fig 4 of Matter 2: Overall housing provision in the TBP you can clearly see that in a plan-led system, with an objectively assessed need (OAN) TBC is delivering against the plan. In fact, Figure 4 shows that delivery is ABOVE the cumulative profile until the period 2029-31. Later years will be met by the JCS review which will include the major Garden Town development amongst others.

I am aware that across the country Inspectors are interpreting ‘under-delivery’ in many different ways, this impacts on the consistency of the 5-YHSL calculation.

If we cannot have a fair and consistent approach then for the immediate period and under the possibilities of this Public Exam, we feel that the 5-Year Housing figures should be in the Joint Core Strategy and not used or considered as part of the TBC Plan.

We feel that a delivery record is more likely to be more robust if a longer-term view is taken, since this has regard to the economic cycles and market conditions.

Today, and in this regard, it has never been more pertinent.