

**Land adjacent to the Orchard Trading Estate, Toddington (EMP2)**

**Formal Objection to the proposed change of use from Agricultural to Built Environment for use as industrial units**

**F.A.O Mr David Reed BSc DipTP DMS MRTPI, Planning Inspector**

**26<sup>th</sup> January 2021**

I write to formally object to the proposal to change the use of land adjacent to the Orchard Trading Estate, Toddington from Agricultural to Built Environment and thus to open the way for a large expansion of the current industry at this very prominent rural location. In these objections, I am joined by many other concerned local residents and their families.

The current proposal includes a field known as the Triangle together with an area to the west of the B4078, the site of an old sewage works, where the impact of a change of use to Built Environment would be less. The grounds for objections which I would like the Inspector to consider are as follows.



1932



1988



2018

1.0 Under Matters, Issues and Questions, para 5.7, I would like to draw the Enquiry's attention to the past planning history of the site. The Orchard Estate is an anomaly in this rural landscape and evolved from a 1930's jam factory to process fruit from the surrounding orchards, now largely laid to fields. In the previous Local Plan to 2011 the same proposal was made to change the use of land at the Triangle field from Agricultural to Built Environment under ref. TO2. It encountered 13 representations of support and 173 of objection, including from Gloucestershire County Council and Toddington Parish Council. Evidence was given at the Enquiry, including my own, and the Inspector judged the proposal should be rejected. I attach relevant sections from the 2002 Proof of Evidence and ask that they should be considered.

1.1 A 2014 Landscape and Visual Sensitivity Study was published in 2014 with the stated remit "...Whilst the primary focus is (the impact) of residential development (the Study) can equally inform about other types of development..". Six areas within Toddington Parish were assessed but the study failed to include the western section covering the Orchard Estate and crossroads neighbourhood. This is a surprising omission given the past history described above. It is suggested the Borough Council should update the report to include and classify this land where many 'highly sensitive' attributes apply equally here as to the areas in the Parish which were investigated, several of which also lie along the B4077.

2.0 Many of the concerns raised nearly 20 years ago hold true for today and objections are made to the Council's Reasoned Justifications for promoting the current proposal, particularly at the Triangle site, on the following grounds.

2.1 Policy ENV1 (LAN2 in 2002). Both sites are within a Special Landscape Area (SLA) and therefore defined as "high quality countryside .. worthy of protection in (their) own right.." and they "...play a role in protecting the .. adjacent Cotswold AONB.." and historic parkland of Toddington Manor. We therefore question whether the proposed extension to the Orchard Estate at these sites is in line with the stated policy aims to protect the local Special Landscape Areas.

2.2 The current Triangle field of 3.81 hectares is in a very prominent position, bordering two major roads through the parish. It provides a natural green and agricultural barrier to mitigate the intrusion of the existing industrial estate in this rural landscape. If built upon, it would drastically and forever change the visual attractiveness and nature of the current rural neighbourhood and detract from the quiet enjoyment of the countryside by local families and the community.

3.0 We suggest a new employment allocation at this location is not justified given the constraints, infrastructure requirements of the proposed sites and the potential impact to the local and wider community. Increased development of these sites will inevitably increase :-

a) Light and noise pollution (Policies EVT2 and EVT3 respectively?, previously ENV2 and ENV3 in 2002). This will impact particularly on nearby family homes, one sited only a few metres from the Triangle site. Light issues on the current estate have previously been subject to complaints and enforcement actions.

b) Sewage. Historically the current industrial estate was served by sewage treatment plants which discharged into the local water course, it is not known if the situation has improved since then and any increase may exacerbate the problem.

c) Public transport. The estate has limited public transport, possibly 2-3(?) bus movements each way per day. Most of the workforce would likely use private transport and we understand that many live outside the immediate communities.

d) Current capacity. Several units are currently free for rental, totalling over 80,000 ft.<sup>2</sup>. It is felt there will be other sites in the Borough more suitable for meeting rural employment requirements than expansion at these specific sites.

3.1 Loss of good agricultural land (Policy AGR1 from 2002). We suggest the effect of both the current pandemic and the impact of the recent Brexit departure needs time to be assessed before long term irrevocable changes are made. Agriculture may become more important to the future UK economy and a compelling case should be made to change and develop good agricultural land in favour of a Built Environment at this moment of time.

4.0 Considerable concerns are held by many locals about increased traffic movements which would result from further development at this site. There is a long standing history of accidents at the crossroads adjacent to the Triangle and two further black spots within a few hundred yards to the west and east of the junction, including the Oak House Bend.

4.1 In 2002 Gloucestershire County Council raised similar concerns and requested the deletion of the site on these grounds. In response TBC stated “..Development of this site would have to provide for the improvement of the Black Sheds junction in order to make it appropriate to the additional traffic which would be using it..”. No such design has been offered to date. It is suggested that this major road work be proposed, agreed with the transport officials and the parish community and then implemented before any development of the Triangle site is considered.

4.2 The neighbouring Worcestershire Parish of Sedgeberrow is outside the loop of consultation. Many residents already have major concerns about an existing problem with traffic and HGV vehicles from the estate travelling along the B4078 and through the narrow village roads. They greatly fear this will be exacerbated by further development at this location.

#### Conclusion

The proposed Local Plan is a culmination of decades of surveys, meetings and document publication, which is difficult for the local residents to track. Until mid January 2021 the proposal to near double the size of the Orchard Estate was not widely known in the community and many villagers are now distressed that a contested proposal of 20 years ago has been resurrected. This is especially true for the homes most directly impacted by a business development on their doorstep which is expected to proceed within 5 years if approved, according to the representation of support by SF Planning. Although each new built unit would be subject to individual Green Notice planning procedures, this proposed change of use from Agriculture to Built via insertion into the Local Plan bypasses the standard planning route. It would open Pandora’s Box to allow a profound change in the rural landscape for the community and nearby residents.

I thank the Inspector for allowing these concerns to be submitted and await the outcome in due course.

Attachments : Local Plan to 2011 a) Proof of Evidence, 10 pages b) Appendix 2, 4 pages

*Note : The various Policy designations LAN1, ENV2 etc have changed amongst the 100+ historic documents lodged on the Local Plan web site since the previous Local Plan to 2011 and it is confusing to a non-professional. My apologies if incorrect references have been used but the underlying Policy aims should be largely unchanged.*

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#### **Supporters :**

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