

STATEMENT OF CASE

ALDERTON PARISH COUNCIL

LAND WEST OF WILLOW BANK ROAD, ALDERTON

Ref: APP/G1630/W/15/3003278 (14/00747/OUT)

Introduction

1. This document forms the Parish Council's response to the application for 53 homes on land west of Willow Bank Road, Alderton.
2. The Parish Council supports the objections made by Tewkesbury Borough Council and believes the application should be rejected for a number of reasons:
 - The development would seriously harm social cohesion within the village.
 - The housing is not needed in Alderton and the proposal is not consistent with the emerging Tewkesbury Borough Plan and the emerging Alderton Neighbourhood Development Plan.
 - The proposal will not support sustainable economic development and the traffic infrastructure would struggle to cope.
 - The access plans to the site are neither safe nor suitable and would increase traffic flows to an unacceptable level.
 - The development would harm the landscape and impact on existing households.
 - There are design issues.
3. A key document in support of the Parish Council's approach is the Appeal Decision made by the Inspector dated 17 March 2015 (G1630/A/14/2222147) in which he rejected a very similar proposal for development on land east of Saint Margaret's Drive, Alderton. ^[1]

Social Cohesion

4. This proposal is for a new estate of 53 homes. The decision against development East of St Margaret's Drive, which was determined very recently at Appeal, was for 60 (net 59) homes. The Parish Council would argue that both proposals are bolt on estates having a similar impact on the village in terms of size of and speed of development and that the Willow Bank Road proposal should also be rejected.
5. The Parish Council especially associates itself with the first point of objection from Tewkesbury Borough Council, "*The proposed addition of 53 dwellings, in addition to the 47 dwellings already permitted at Land at Beckford Road, Alderton would result in cumulative development of the village which would be of a scale disproportionate to the existing settlement. As such the proposed development would fail to maintain or enhance the vitality of Alderton and would have a harmful impact on the social wellbeing of the local community risking the erosion of community cohesion.*"

Furthermore, the proposed development, in addition to the Beckford Road development, would not be proportional to the size and function of Alderton as a Service Village as defined in the emerging Joint Core Strategy Submission Version November 2014 and would not reflect its proximity and accessibility to Cheltenham and Gloucester.

6. A critical factor is that 47 houses are already being built in the village on a site at Beckford Road. This means that any new proposal needs to be viewed in the context of the overall impact of the new proposal, plus the Beckford Road development. In this case that means 53 new homes plus 47 already agreed, giving a total of 100 homes or, assuming 3 people per household, 300 new residents within an existing settlement of 268 dwellings. That represents a total increase of 37% in housing stock in the next few years.

(There are different methodologies for calculating the size of the settlement. Thus for example there is a small discrepancy between this figure and the Tewkesbury Borough figure of 277)

7. As the proposal here is almost identical to the rejected proposal for St Margaret's Drive, in terms of size, estate format and immediacy of impact, the views of the Inspector in that case are critical and can be read across to this case. The full extract from the Inspector's decision in relation to social cohesion and sustainability is printed below.

"Effect on the Village and on the Community"

26. Alderton is a healthy vibrant community that is valued by its residents, where about one half of households have resided for over 20 years. It is also a village in which its residents are engaged in matters of community interest and this is evident through their involvement in the Service Village Forum which supports the JCS evidence base and through the carrying out of surveys, a Village Design Statement and in the preparation of the emerging Alderton Neighbourhood Development Plan (ANDP). There is also a wide range of clubs and associations.

27. The Parish Council and local residents were present at the inquiry and provided a balanced approach in expressing their concerns. It was clearly evident from their contributions that they place a high value on maintaining and planning for their community and they are very much concerned over the cumulative effect that the appeal scheme would have following on from the Beckford Road development (and other schemes that may not have been determined finally).

28. In allowing the Beckford Road development, the inspector recognised the concerns of APC that the scheme may set a precedent for others (9) but she made it clear that her decision should not be interpreted as a finding that Alderton is necessarily a sustainable location for any further residential development. She went on to say that 'Substantially increasing the number of dwellings in a settlement without proportionate increases in infrastructure, employment opportunities and other local services risks eroding community cohesion, and the fact that 47 dwellings have now been allowed on appeal will be a consideration to be weighed in the balance when considering any future proposals'.

(9) Para 76 APP/G1630/A/13/2209001

29. The appeal proposal makes contributions through the planning obligations towards education, libraries, highways, open space, allotments, health, dog bins, sports facilities and affordable housing. These contributions would provide proportionate increases in infrastructure and would be benefits of the scheme.

However there was disagreement between appellant and the Chair of the Governors of the Oak Hill Primary School regarding the pupil forecast as identified by the County Council, a matter that was left unresolved at the Inquiry, but there was no evidence of weight to suggest that the viability of the school would be threatened in the absence of the appeal scheme.

30. No permanent employment would be provided through the scheme although it would provide jobs on the site through the construction phase and perhaps assist in the viability of a few local jobs in the area in the longer term. However, community cohesion goes beyond this in a small rural settlement. Also of significance is the capacity for the settlement and the community to accept the impacts that a rate of change for the construction of 107 houses would have over a relatively short period of time in a settlement of only 265 dwellings. Alderton has grown organically and slowly over a long period of time and its physical character would change as a result of the major development that would arise from the Beckford Road scheme and the appeal proposals, which together would represent a 39% increase in the number of dwellings. Alderton would appear more suburbanised and less of a rural settlement and it would be adversely affected as a consequence.

31. The Framework at paragraph 7 recognises that sustainable development includes a social role that planning performs and Section 8 sets out how healthy communities can be promoted. Mr Smith, on behalf of the Council, made reference to various studies on social cohesion and sustainability and to factors relevant to an assessment. Whilst this provided a useful background, its application to a small rural settlement was limited although the sense of identity of a place was aptly summarised as being ‘...rooted in history, in local celebrations, the stories people tell about the area, and in regular local events. These build up over time. When new large-scale housing developments are built, the sense of place cannot be defined by its shared history. New residents will not know others, and, in the early stages, there will be few social connections.’ (10)

(10) Page 32 Design for Social Sustainability Document F2

32. At the inquiry there was considerable discussion about the age profile of Alderton. Whilst the proposed development would accommodate younger households and assist in bringing the population profile more into balance, no doubt the Beckford Road proposals would go some way towards achieving this.

33. Apart from the physical changes that would occur, I recognise that a sizeable expansion of the village could take the community some time to adapt to and there could be adverse consequences for the social and cultural wellbeing of existing residents, as recognised in an appeal in Devon. (11) I recognise that, as in other cases elsewhere, there is a danger that potential adverse impacts of new housing on an existing community is a consideration that needs to be weighed in the overall planning balance. This goes beyond a community’s natural resistance to change. Indeed, the APC has indicated that a number of residents would sell up and leave the village because Alderton would no longer be a quiet rural village.

11 Core Document D2 APP/U1105/A/13/2191905, Feniton, Devon

34. The appellant referred to an appeal decision at Stoke Orchard (12) where the impact of further housing development on social cohesion in the village was not considered to be materially affected. However, I do not consider that the Alderton proposals are comparable to the situation in Stoke Orchard as that village has recently experienced substantial expansion arising from a brownfield site redevelopment.

12 Document 37 APP/G1630/A/14/2223858

35. *I conclude on this issue that the proposed development would have a disproportionate effect on the village in terms of the cumulative impact of development and also on the social wellbeing of the community, which I consider would be harmful.*

8. *Paragraph 28 above also makes clear that the Inspector who allowed the Beckford Road development ^[2] considered its impact, including that on social cohesion, should be weighed in the balance when considering future proposals. The Parish Council firmly endorses that finding.*
9. *Several speakers on behalf of Alderton Parish Council at the Saint Margaret's Drive Appeal exemplified what social cohesion meant.*
10. *Mathew Clayton in his opening address said: ^[3]*

“First let me tell you about the village. Alderton is a village of some 277 houses situated in north Gloucestershire, lying under the Cotswold Hills on the edge of the Vale of Evesham, about 7.5 miles east of Tewkesbury. The village is visible from a number of key viewpoints such as both sides of the adjacent Cotswolds Area of Outstanding Natural Beauty (AONB), the Winchcombe Way footpath, and the B4077, a main artery into the Cotswolds. A key view of the village from the B4077 shows it to be a compact, traditional rural settlement formed around a mediaeval church, and set apart from larger settlements and major roads in an attractive landscape setting. The village is situated in a Special Landscape Area abutting the boundary of the AONB and was the subject of development on a modest scale at different times during the 20th century.

The result is a compact settlement of varied housing types in which people assist one another, for example, by providing assistance with transport to bigger centres for essential services. Alderton does not pretend to be a picture postcard Cotswold village. Real people live here, and choose to live here because of its community. Indeed that is exactly why my wife and I decided to start our young family here. Its population of roughly 500 (a similar size to a small secondary school) on the whole know each other.

The simplest of things – a smile and a ‘hello’ - are important to those who live here when they pass another villager out walking, even if they are not closely acquainted. That sense of community will be lost if the village is permitted to grow by nearly 40% in such a short timeframe i.e. one or two years.“

11. *Ian Armishaw speaking about sustainability and social cohesion ^[4] said:*

“My name is Ian Armishaw and I am here on behalf of Alderton Parish Council. In my presentation today I will seek to demonstrate the negative impact this development would have on Alderton Village in terms of Vitality and Social Well Being and Sustainable Living.

“I will start with Vitality and Social Well Being. Both of these terms are referred to in the NPPF but are not explicitly defined. Within Alderton, Vitality and Social Wellbeing have become synonymous with the term Community Cohesion.

In the Alderton Matters Survey 2014 a question was included on what community cohesion meant to residents. Unprompted, they came up with definitions such as:

- *A community speaking with one voice*

- *A community working together, supporting each other, participating in community event and upholding everything that has made the place special*
- *A good community spirit, a sense of belonging, where people live and work in harmony. The term community spirit or community ethos is a thread running through our consultation responses.*

I quote this from Core document E4 page 24-25 in response to questions E4 What does your household really value about living in Alderton? The majority of responses linked the high-functioning nature of the community to its small size, connection to the countryside and health and wellbeing derived from its quiet, rural setting: “Alderton represents everything that is good about village life.”

The extent to which such responses are replicated across the two surveys and the Youth survey makes the first clear point about Alderton’s cohesiveness, i.e. that community spirit is one of the first things that spring to mind when residents of all ages are asked what they value most about their ‘place’.

The Report concludes in the face of overwhelming evidence that “the continuation of a rural way of life outweighs benefits from development such as improved facilities.”

It is worth considering what has generated this ‘community spirit’ and how you quantify what will sustain or damage it. I am not an expert in the literature on these topics but our empirical evidence does throw light on what makes a community thrive or die in terms of its social functioning.

As you may have seen or will see from your site visit, Alderton offers a mix of housing – small cottages, ex-council houses, terraced and semi-detached houses, 20th century bungalows and detached family homes, and even the odd manor house. It is by no means an exclusive village full of ‘expensive’ executive houses, as the Appellant seeks to portray. The juxtaposition of old and new, small and larger houses, bungalows and terraced properties produces instead a remarkable social mix, in which older and younger residents live in close proximity to one another. This makes it possible for different age groups to have regular daily contact, at least in the street or shop, if not on personal terms.

I would just also clarify a point the Appellant has made in their Proof of Evidence paragraph 7.44 that “large scale development is a concept known to Alderton” and makes reference to the St Margaret’s Road development. However I would point out that this development, built over 50 years ago, was for 23 dwellings and constructed over a time span from 1961 to 1966. The development comprised of Bungalows, Dormer or Chalet Bungalows and houses, all detached with gardens at both the front and the back and with sufficient parking available for both residents and visitors. It represented more the existing village layout and in no way would be comparable to what we now see in so many housing developments which are cramped, are dense and lack individual space. If 23 dwellings built over a five year timescale can be regarded as a large scale development, then this proposal can only be classified as enormous.

Knowing one another is a key part of sustaining the social life of a community. This can be achieved through clubs and organised events. We have some good examples of that here: pub quizzes and bingo; the 5k Fun Run in aid of the Preschool; summer and Christmas fetes in aid of the church; a Christmas charity football match and dances in aid of the Village Hall. But day to day life is what really matters when it comes to building community spirit.

Here undoubtedly the issue of size plays an important part. The village is currently compact in shape and, while not tiny, is hardly a big village on the lines of nearby Bredon or Broadway.

This enables people to regularly keep in touch and provides a safe place for children to grow up in. One resident describes: "My wife and I currently have no qualms about sending our 8 year old son by himself on errands to the village shop, a trip which involves crossing a road out of sight of the house. We know that other villagers will recognise him at least, and will look out for him. We also know that he will be safe in crossing the road due to traffic levels. Our ability to afford him this liberty will be severely affected by a near 40% increase in population and consequent increases in traffic levels in the village, if this development goes ahead in addition to the Beckford Road development."

Perhaps the strongest marker of Alderton's community cohesion is that people want to remain here – the response to the Alderton Community Questionnaire demonstrates that 48% of respondents have lived in the village for 20 or more years (page 14 of Core document E4). Many examples can be cited of people moving house within the village, when they need to upsize or downsize for whatever reason. Doing so remains possible, because of the range of housing options available. An estate agent was quoted as saying "once you're in Alderton, you will want to stay" - that has certainly been our experience. This demonstrates a degree of community cohesion which will be damaged by having to absorb a disproportionate increase in population in a short space of time.

The picture of Alderton as a stable community does not, however, mean that it is a stagnating community. Mr Rainey, for the Appellant, will suggest that Alderton is an ageing village, on the basis that 61% of its population is aged over 40. That may have constituted an ageing population in mediaeval times, but not in the 21st century! The fact is that the existence of Oak Hill (Church of England) Primary School in our midst brings a large number of young families to the village. There is also a thriving baby and toddler group which has welcomed several new young families to the village. Mr Rainey will cite a figure of only 5.8% of households in Alderton being headed up by someone aged under 35, and relies on this as evidence that young people find it difficult to form households here. On the contrary, it is merely a fact of life that young people forming households are likely to want to do so in an urban centre with local employment and a wide range of leisure facilities, rather than a rural location with no local employment and limited options for going out.

We do recognise that, in a village of this nature, there will be some young people who have grown up in the area and who want to remain here when they form their own households; the village needs to be able to provide for them. To the extent that we cannot do so already, the development already approved for Beckford Road will provide 16 affordable houses, and we welcome that. Our NDP is also making provision for more small-scale developments in the heart of the village to meet any additional demand for starter homes and to provide opportunities for residents in larger accommodation to downsize. Indeed Alderton Parish Council led the way back in 2010, when whilst working in conjunction with the Gloucestershire Rural Community Council undertook a Housing Needs survey within Alderton. The outcome of which evidenced a need for 4 Affordable homes. It was agreed that a plan for 8 would be proposed and the Alderton Community Trust was formed as a vehicle to progress this. Initial work was undertaken with Tewkesbury Borough Council and potential sites identified within the Village. However with the recent onslaught of development applications the proposal has been overtaken in effect by events along with the adoption of the JCS strategy and the NDP.

Sir, I would argue that all of the factors described strongly demonstrate what it means for Alderton in terms of Vitality and Social Wellbeing. Allowing this development to proceed would undermine the current level of community cohesion and in turn will seek to undo what is clearly valued by all who live in Alderton.”

[Surveys mentioned here are covered later in this report]

12. 18 year old Holly Lockley in the Parish Council’s closing statement ^[5] included the following:

“Of even greater concern is the impact on Alderton’s community. Before 2015, we had no housing estates. For a village of this size, 60 houses is a housing estate and one, furthermore, which comes on the heels of another estate of 47 houses. Over the years, we accept that there has been infill development in Alderton, resulting in different houses being built at different times. But this has been piecemeal growth rather than a big, bolt-on development. The result is a compact and varied village in which people can easily make contact with one another. Housing estates on either side of the village would mean bringing in many new residents at the same time, something which will not only damage this community’s sense of identity, but also its ability to support one another. It is worth pausing to consider that this application, in conjunction with the 47 houses already allowed – and now being built – will result in 39% increase in the size of the village in merely one or two years.

I will conclude by reading some thoughts on behalf of an older resident who cannot be here today. I am only 18 but agree with everything she says.

‘Like a lot of people, my husband and I were looking for a peaceful, rural location not too far from Cheltenham when we moved here from London in 1975. We found a little cottage which has an open outlook over the fields affected by this proposal. I have been here ever since, and every day enjoy the view from the back of my house to the nearby hills. I spend many hours looking at this view as I am not as mobile as I was.

I worked in Cheltenham; it was easier to travel to work there than it is now. I could catch a bus into work in the morning at 8am and get one home at 5 or 6 pm, usually the latter as I worked in a shop. You couldn’t do that now as the last bus back from Cheltenham leaves at 4.30pm. Now most people use their cars. Some still work in Cheltenham or Gloucester but others travel as far away as Birmingham or Bristol for work.

I don’t have a car but I am very well supported by friends and neighbours for getting around. For example, I quite frequently need to go to the doctors in Tewkesbury or the hospital in Cheltenham for appointments. As there is no regular bus service I can use, I rely on these friends and neighbours for transport. Luckily, Alderton has a great community. Perhaps that’s because younger and older people live near to one another so everyone knows everyone else. I also had a lot to do with the children in the village in the past by helping at child minders and at the playgroup. So I know lots of people, including those much younger than me.

What difference would this proposal make? Personally, it would affect me very badly. I would lose my view across the open fields to the hills which I enjoy every day. I would feel shut in and depressed and would need to go to the doctor even more. But worse still, I might lose some of my helpful neighbours if they were to move to avoid it all. The people buying the new houses could not replace them.

They would be unlikely to integrate into village life for some time and are likely to be at work in the day to maintain their cars and pay the mortgage. In any case, they would have no knowledge of the networking that we have here in Alderton which supports me so well.

You can't just build this many houses on the edge of a village like Alderton, destroying the views that people love and their sense of wellbeing and community, and expect it to function as effectively as it currently does.

So this proposal will have a very serious impact on older members of the community even placing them at risk. This is a real danger. Please don't let it happen. Thank you for listening'."

13. Social cohesion in Alderton is exemplified by the high degree of participation by villagers in village surveys and the consistency of the outcomes.
14. The views of the community are reflected in the Alderton Community Survey results in 2013 with an 88% response rate ^[6] and the Alderton Matters survey in 2014, which had a 75% response rate ^[7]. Of those responding in 2014, 84% endorsed a vision of *'The people of Alderton wish to see a sustainable future for the Parish whilst maintaining the unique nature of the community and its historic, social and environmental heritage, so that residents of all ages can enjoy an outstanding quality of life.'*
15. In the 2014 survey there was over 86% agreement with proposed Alderton NDP objectives. This was reaffirmed through a consultation on proposed NDP policies led by Kirkwells, the planning advisors assisting the ANDP group, in March 2015:
 - To achieve small-scale housing growth in line with that agreed for Alderton as a Service Village in the draft Joint Core Strategy.
 - To enable phased housing growth, which provides choice for local people and that can be readily integrated into the local infrastructure, services and facilities in the parish in a way that enhances social cohesion.
 - To support economic development appropriate to the rural context of Alderton.
 - To ensure sustainability in the construction of buildings so that they meet or exceed legislative standards.
 - To address local flood risks and enhancing rather than damaging the Environment.
 - To protect and enhance the distinctive landscape of Alderton Parish, its extensive open views, natural beauty and biodiversity.
 - To achieve a sympathetic response in any new development to distinctive local building styles and materials in Alderton's settlements and sympathetic redevelopment of redundant buildings.
 - To maintain and improve Alderton's facilities, services, infrastructure and community spaces.
16. There was over 82% agreement for the following Housing and Development proposals:
 - A scale of development that avoids adverse impact on the economic, social and environmental health and wellbeing of this rural parish.
 - Development as an integral part of the community, not 'bolted on'.
 - Growth phased so that it can be readily integrated into the local infrastructure of roads, schools and services.
 - Local letting agreements to secure affordable housing for local people and those with a local connection.
 - A mix of home types in developments.

- Integration between different types and tenures of housing.
 - Avoid coalescence (joining) of the Alderton settlements.
 - Avoid coalescence of any of the Alderton settlements and neighbouring settlements outside the parish.
 - High standards for quality of construction (*in line with Policy S3 of the local Joint Core Strategy – Sustainable design and construction*).
 - Early and full engagement with residents for any proposed developments.
 - Proposed changes in design after planning approval is gained should trigger further consultation with the community.
17. It is interesting to see that the Beckford Road development calls itself 'Alderton Grange', almost identifying itself as outlying, a separate community from the village. To have a further large estate will add to this separation of new from old.
18. Alderton Parish Council, speaking on behalf of villagers, sees that there is a remarkable degree of social cohesion within the village borne of the size of the village, but also the ability to integrate newcomers who come to live within the existing settlement. The creation of a new bolt on housing estate at one end of Beckford Road with about 150 new villagers will put a strain on the community. The addition of a further 150 from this further bolt on development in another part of the village would destroy the fabric of the settlement.

Housing Need

19. There is now a draft Tewkesbury Borough Plan 2011-2031. This suggests that Service Villages, of which Alderton is one, will need to provide for 752 new homes to 2031. It is accepted that the draft plan shows land west of Willow Bank Road as a possible site option and does refer to providing capacity for build on sites. However, the plan also makes clear that the capacity has been shown only for illustration and that some of the options provide for far more capacity than is needed.
20. A critical part of the draft Tewkesbury plan is the Tewkesbury Borough Plan Background Paper: Approach to Rural Sites. ^[8] This includes criteria relating to accommodating levels of development proportional to their size and function and also reflecting their proximity and accessibility to Cheltenham and Gloucester taking into account the environmental, economic and social impacts. As part of that process, a Service Village Forum was formed in 2014 under the chairmanship of a member of the Alderton Parish Council with representatives from all service villages, to discuss a method for distributing new development between settlements.
21. Alderton played a full part in that Forum and the work was supported by Gloucestershire Rural Community Council and Borough officers. Appendix 7 ^[8] shows the detail of this and Appendix D the outcome of the disaggregation process and gives an indication of the housing balance. Alderton has a commitment of 48 houses and a remaining balance of minus 2. In other words, the commitment for Alderton is fulfilled by the Beckford Road development.
22. It is recognised that this is not the final position and there could be variation in demand either way. However, it does suggest that it would be foolish to go ahead with another major development at this stage. It should also be remembered that the planning is dealing with 20 years' worth of housing demand and not a need for all development to take place immediately. The draft Tewkesbury Borough Local Plan recognises the importance of preserving the character of rural settlements; to substantially increase the size of a rural village such as Alderton within two rather than twenty years would irrevocably damage its rural nature and ambience.

23. It is recognised that the proposal does include potential provision for affordable housing. However, a local housing needs survey in the village in 2011 identified a purely local need for 2 or 3 affordable homes but suggested the number might be increased to 7 or 8. Housing waiting data from Tewkesbury Borough Council at the time of the St Margaret's Drive Appeal showed a need for 31 affordable dwellings in North East Tewkesbury.

The approved scheme for 47 new houses in Alderton already delivers 16 affordable houses, more than half this area total. We submit that there should be no requirement on Alderton to deliver the remaining 15 although further small scale development, including potential infill sites, may well contribute to this.

Local Neighbourhood Plan

24. Alderton is well advanced in its preparation of a Neighbourhood Development Plan. The background and key milestones from that summary are as follows:
25. At an open meeting called by Alderton Parish Council in November 2012, a group of local volunteers was established to formulate a local plan in response to ad-hoc planning applications from several developers. The Alderton Plan Group's role was to plan for the future, focussing on the evolution of the parish over the next twenty years. In October 2013, the decision was made to register the Alderton Plan as a Neighbourhood Development Plan and the Group came under the leadership of Alderton Parish Council. Key milestones were:

27 November 2012 Group established

25 January 2013 Alderton Plan Group open meeting attended by over 65 residents

26/27 January 2013 Alderton Plan Group exhibition in the Village Hall attended by approximately 200 visitors

February 2013 Distribution of Alderton Plan Group questionnaire to seek views from local residents to support the development of an Alderton Design Statement – 88% of residents of Alderton village and neighbouring settlements responded to the Community survey. A separate youth survey was conducted via Survey Monkey. These activities were undertaken with support from the Gloucestershire Rural Community Council and Tewkesbury Borough Council

March 2013 Results published in the first Alderton Community Consultation Outcomes Report

18/19 May 2013 Design Statement consultation in the Village Hall

May – Sept. 2013 Plan Group prepare the Alderton Design Statement

October 2013 Design Statement endorsed by Alderton Parish Council

October 2013 Alderton Parish Council decides to produce a Neighbourhood Plan for Alderton Parish, Tewkesbury Borough Council (TBC) supports the application

October 2013 The Alderton Plan Group becomes the Alderton Neighbourhood Development Plan Group (ANDP)

November 2013	Community Questionnaire extended to outlying parts of the Parish; the Outcomes Report updated with these additional results and titled Alderton Parish Consultation Outcomes Report
March 2014	Planning approval granted for 47 houses
July 2014	Locality funding applied for
September 2014	GRCC support on planning process engaged
October 2014	Alderton Matters household survey to check support in the community for the ANDP Vision and Objectives statements; collation of data
December 2014	Preliminary investigation of Strategic Environmental Assessment Impact likely to be required
December 2014	Preliminary number of houses identified for Alderton as a Service Village (subject to examination and approval)
Jan/Feb 2015	ANDP Group working with Kirkwells, Planning Advisors, to draft policies for inclusion in draft ANDP.
March 2015	Consultation event and Exhibition in Alderton Village Hall, attended by 69 residents. Visitors provided feedback on draft ANDP Policies, green spaces, and identified preferred areas for development within the ANDP area, for inclusion within the ANDP. Opportunity to gather feedback on Tewkesbury Borough Council draft Borough Plan.
April 2015	APC feedback to TBC on draft Borough Plan informed by 28 March 2015 event above. Potential sites identified within TBC draft Borough plan were not supported, alternative sites, which will be promoted in the ANDP.
April / May 2015	Submission of draft ANDP to Tewkesbury Borough Council for 'screening'
May – September 2015	It is the intention that the ANDP will be a 'made' Plan by the autumn of 2015. The steps remaining are 'screening', completion of an SEA, a further consultation with parish residents, incorporation of amendments following consultation, submission to the Local Planning Authority (Tewkesbury Borough Council) for 6 weeks, Independent examination followed finally by a 25 day (minimum) public Referendum.

It should be noted that the interruptions caused by the need to prepare for a raft of planning appeals, and the accommodation of their outcomes, has led to several hiatuses in the progress of the ANDP. This was a factor drawn out during the examination of evidence at the St Margaret's Drive appeal.

26. The draft ANDP is scheduled to be available before the Hearing Date for this appeal and will be made available to all parties. As indicated above the draft does not support the potential sites identified in the draft Borough Plan but instead identifies other smaller sites for phased development over the period of the Plan, if Alderton needs to take more houses than the number already considered to be its fair share.

27. A response to the draft Borough Plan has been sent to Tewkesbury Borough Council by the Parish Council ^[9] disagreeing with the inclusion of the site identified in this proposal and including two possible alternative sites to the west of the village.

The promotion of these possible sites in the Parish Council response to the Borough Plan and within the draft ANDP is predicated only where further development on those sites takes place over much longer timescales, thereby minimising the impact on social cohesion within the village.

28. The Parish Council would like to draw attention to Brandon Lewis's letter of 27 March 2015 to Simon Ridley ^[10] which says that weight can be given to relevant policies in emerging Local and neighbourhood plans.

Economic Sustainability

29. The Parish Council would also argue that the development does not support economic sustainability, a key plank of the National Policy Framework. The economic role should be one which contributes to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation and by identifying and co-ordinating development requirements, including the provision of infrastructure.

30. The planning application by Edward Ware is based on the presumption that Alderton has a level of primary services and general provision that could support a sustainable development. The application fails to evidence that the proposed development will support the growth of the village and its services. Salient facts are:

- Alderton has a very small village shop which has no facility to expand and no parking facilities.
- There are extremely limited employment opportunities locally. The Parish Council's initial response to this proposal made in November 2014 ^[14] contains in pages 8 to 10 a summary of employment data.
- Increased housing of this extent will significantly increase commuting by car thus increasing CO2 emissions with significant travel costs [pages 10 to 13 of the same document]
- Broadband access in Alderton is very slow [page 11] thus deterring home working and self employment.

31. In addition Alderton Parish Council's case is to evidence that this proposed development does not meet the requirements of the NPPF in relation to **promoting sustainable transport modes**. The proposed development will have a significant impact on the village and the surrounding road network and fails to meet one of the core principles of the NPPF Para 17 which states that planning should:

“Actively manage patterns of growth to make the fullest possible use of public transport, walking, cycling and focus significant development in locations which are or can be made sustainable.”

32. Section 4 paragraph 29 of the NPPF also states that:

“The Transport System needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel.” and paragraph 34 requires new development to be located so as to minimise the length and number of motorised journeys and encourage the use of public transport, cycling and walking.

So what do we have in Alderton?

33. A limited **Bus** service is available to the village. Although the retired are helped by the current service, the timetables clearly indicate it is not possible to use any of the services to sustain a 9-5 job, let alone flexible working hours or shift work in any of the nearby centres of work: Cheltenham, Gloucester, Tewkesbury or Evesham. This confirms our status as 10th out of 12 service villages for ‘proximity’ to areas of employment in the calculations conducted by the Service Village Forum.
34. The survey incorporated in the Alderton Community Consultation Report of 2013 shows that 189 households never use public transport to travel to and from Alderton. Only one resident in the community used public transport to travel to work at the time of the survey.
35. There are some services available by **train** from the station at Ashchurch, Tewkesbury, to the major centres of Bristol, Birmingham and Gloucester, for example, but the costs make this an unattractive option. You also need to use your car to get to the station in the first place.
36. There are no designated **cycling** paths in or around the village to provide safe, carbon-neutral modes of travel to work. The main roads are busy at commuter times and the A46 and B4077 have an accident history which makes cycling further afield from the village highly undesirable. The distance required to the main centres of work and recreation do not make this mode of transport practicable, for example Cheltenham 11.5 miles, Evesham 8.5 miles, Tewkesbury 7.5 miles and Gloucester 19.4 miles.
37. Alderton has a rich heritage of **footpaths and bridleways**, including a long distance path, the Winchcombe Way, which provide opportunities for exercise and leisure. Beckford Road and Dibden Lane are particularly used by walkers, families out for an afternoon stroll and horse riders. Our consultations have repeatedly shown just how much these lanes mean to the residents of Alderton village. Increased traffic from the ‘47’ and with the possible addition of the ‘53’ on these narrow access roads is a worrying prospect. In addition, there is no feasible way people could walk to the main centres of work in the area, given the remote location of Alderton Village.
38. The central core of the Alderton settlement is a small quiet, rural community of 267 dwellings. To add 47 agreed extra dwellings and then a further 53 from this proposal in one large mass will put a great strain on the existing and fragile highway network on which this community depends.
39. We know from our local experience that this additional usage will have a significant rather than a minor impact on the single carriageway sections of Beckford Road and Dibden Lane in particular. Beckford Road and Willow Bank road entrances to the village are also vulnerable to flooding, serious potholes and grass verge erosion as vehicles attempt to pass in narrow places.

40. Routes in the village are also single track in places. An increase in traffic flow will thus cause hazards on roads used daily by villagers. As some houses in the village centre have no off-street parking, the road width is narrowed and restricted by parked cars, especially in the vicinity of School Road. Buses already have great difficulty getting around the village now because of parked cars, so much so that a bus company has re-routed its service to avoid the village centre. Thus we submit that the increase in traffic flow will have a negative impact on the quality of life in the village as a whole. A good example is where the local children currently play Basketball in the street and stop when cars appear. We hazard a guess that with the extra cars driving around Alderton then street Basket Ball will be a thing of the past.
41. It is not just the impact on the roads within the village that needs to be taken into consideration but also the knock on effect on roads outside the village, in particular the B4077 and the A46. Coupled with the effect of other new developments within the area such as at Winchcombe, these already fast and busy roads will become even more dangerous. Congestion is also a feature, with queues regularly forming all the way from Junction 9 of the M5 at Tewkesbury to the Teddington Hands roundabout at peak commuting times.
42. The potential increased traffic flows generated by this proposed development also raise the question of wider road safety. The B4077 has been the scene of 2 fatal accidents in the last 2 years leading to residents setting up a B4077 Action Group, which is trying to improve the safety along this stretch of road. Their website records a list of incidents over the last few years (<http://b4077.weebly.com>).
43. In addition, the A46 has seen 10 accidents in the last 2/3 years along the stretch of road from Beckford to Little Beckford, 2 of which were serious and the rest classified as slight. Any increased traffic flow can only serve to increase the propensity for more accidents to take place on this busy highway.

Access

44. There is a single small road access to the proposed site. With 53 dwelling units this would create a minimum of 106 vehicle movements. With a significant number of 4 and 5 bed homes there could be approaching 150 vehicle movements. At the junction of Willow Bank Road to the B4077, taken together with extra cars from Beckford Road it is probable there would be a queue of traffic in the early morning as residents leave for work. If this occurs, it would be difficult for buses or large delivery vehicles to enter Willow Bank Road from the B4077 thereby causing congestion. Additionally Willow Bank Road going towards the B4077 is not wide enough for two cars to pass and the bridge over Carrant Brook on the same route is from time to time closed because of flooding.
45. The proposed site access at Willow Bank Road is close to a blind bend to the north. When leaving the site there could be an issue when vehicles are approaching from the left where visibility is restricted. This would be aggravated by pedestrians waiting on the footpath to cross the road.



46. The proposed site access arrangement plan shows a footpath at Willow Bank Road. The proposed footpath runs along Willow Bank Road to the north. This is where the developer proposes a pedestrian crossing. It should be noted that this position is close to a blind bend in the road and would present a safety issue for pedestrians crossing the road. Attached is a diagram ^[11] showing access issues at the proposed development.
47. Furthermore, there is a weight limit on the bridge over Willow Bank Road of 7.5 tonnes which would mean that construction traffic would have to come into the village via Beckford Road, or Dibden Lane, thus passing residential homes, disrupting the village and causing road safety hazards.

Landscape

48. The proposed site is a Special Landscape Area. [SLA] In addition in a Landscape and Visual Sensitivity study done for Tewkesbury Borough Council by Toby Jones ^[12] he identified the site as 'Medium' in a High/Medium/Low categorisation in terms of both Landscape Sensitivity and Visual Sensitivity. There were many other sites in other Service Villages that were graded as 'Low'. His report refers to openness of lower slopes and a setting for the AONB. He says the sense of separation between Alderton and the B4077 is characteristic and vulnerable to insensitive development. The Parish Council believe that a large modern housing estate is an insensitive development and that it will bring the village boundaries that much closer to the B4077, weakening the historic separation. As Brandon Lewis ^[10] says, 'While National Parks, the Broads, Areas of Outstanding National Beauty and Heritage Coasts quite rightly enjoy the highest degree of protection, outside of these designated areas, the impact of development on the landscape can be an important material consideration'.
49. There is a tendency for the phrase "natural rounding off of this corner of the village "to be used in relation to the proposed development. However, as the Inspector said in paragraph 19 of Appendix 1 in relation to St Margaret's Drive, historically the village has generally had an east to west layout with two historic cluster areas. This will be accentuated by the Beckford Road development. Were the Edward Ware development to proceed, it would significantly alter this historic development pattern.

50. There would also be a loss of open pastureland which forms a natural outlook for existing households on Willow Bank Road.

Design Issues

51. The existing access track between Nos 54 and 56 Willow Bank Road enjoys softscape along their boundaries. The proposal to remove all softscape with the exception of one tree will expose both existing properties and their private rear gardens. There is no indication of any treatment to the boundaries of Nos 54 and 56 although the proposed site access arrangement plan indicates a possible acoustic fence along the north boundary of No 56 Willow Bank Road. This may be suitable in an urban location but is not sympathetic to rural locations and does not accord with the Alderton Design Statement.^[13]
52. The proposed illustrative Master plan as submitted cleverly ghosts the outline of the existing properties at Nos 50 to 74 Willow Bank Road. These outlines are not fully correct and give a false impression of relationships between the proposed development and existing properties, which a site inspection would certainly show.
53. Also the proposal shows enhanced boundary planting along the boundaries of existing dwellings. It should be noted that, together with proposed dwellings, the afternoon sunlight would be completely lost to the rear garden of existing dwellings. Also there are proposed dwellings which would have gable wall ends close to the west boundaries on a number of existing dwellings, which is unreasonable due to the impact of the proposed buildings onto existing property gardens.
54. The proposed site layout shows no or little garden/amenity frontages, with many dwelling front entrance doors direct onto road or footpaths. This form has no acceptable rural design features for its village location and again, does not accord with guidelines in the Alderton Design Statement.
55. The proposed plan indicates a footpath link to the allotments which is not acceptable as this would be a security problem. There is no public right of way footpath through or over the allotment grounds.
56. On the proposed site plan car parking spaces to dwellings are limited for each unit and do not address parking requirements for visitors, or the likely number of cars required for each family unit. The draft ANDP identifies in Draft Policy A8 – Parking Standards in new developments: *To ensure that adequate parking provision is provided, parking proposals for residential development will be required to include allocated parking for each dwelling which meets the following standards: dwellings with 1 bedroom, 1 space; dwellings with 2/3 bedrooms, 2 spaces; dwellings with 4 or more bedrooms, 3 spaces; sheltered housing up to 2 bedrooms, 1 space. In addition there should be available visitors' off-road parking providing at least one space per dwelling. Tandem parking will be counted as one space.*
57. From developments already constructed and occupied within Tewkesbury and Bishops Cleeve areas, limited parking as shown on the proposed plan causes excessive overflow parking on estate roads. This causes problems for emergency, delivery and refuse vehicles. Particular parking issues can occur at Affordable Housing locations. These issues have not been addressed in this proposed development.
58. The proposed plan shows open views to the west boundary for new dwellings but shows no thought or regard for loss of open views that existing properties presently enjoy.

59. The allotments are currently being re-organised to the south boundary, with proposals to remove scrub planting along the boundary to allow sunlight to filter through to the allotments. This will allow the ground to dry out quickly after rain periods and also provide direct sunlight to vegetable planting on the allotments. With proposed terraced dwellings on the opposite side of the allotment site's southern boundary, this will prevent sunlight filtering through to the allotment plots.
60. No indication has been provided to show proposed house type elevations, scale and design drawings. Therefore comment cannot be formalised.

Parish Initial Response to Proposal

61. Appendix 14 ^[14] is the Parish's initial response to the proposed development prepared in November 2014. It contains additional information on employment, transport and schools.

Appendix 15 ^[15] is a map showing the various development proposals that have encircled the village in recent times distracting attention from the need to finalise the local plan and provide for community ownership of future development.

Conclusions

62. The National Planning Policy Framework holds at its very core the fundamental principal that planning should be community led. The first paragraph of its introduction states, "[The NPPF] provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities".
63. Further, it states 12 core planning principles of which the first states that "planning should be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area."
64. We believe we are fulfilling both these ideals and considerable responsibilities which run alongside through the engagement, energy, creativity and sheer hard work of our citizens, representatives and public officers. We are demonstrating the democratic process in its best light. Through the JCS, Borough Plan, and the ANDP, this community is preparing a comprehensive and compelling development plan, which seeks to achieve two key objectives in equal measure namely:
- 'Delivering the Objectively Assessed Need for housing in the period to 2031 and protecting our communities, infrastructure, heritage and cohesion against inappropriate and disproportionate opportunistic development.'
65. The Parish Council and the village residents are not against development per se and as can be demonstrated have taken the lead locally by working with Tewkesbury Borough Council to formulate a Neighbourhood Plan. However, development must be proportionate to the size and location of the village and take into account the existing infrastructure. Any development should be phased to allow the community to absorb additional residents on a sustainable basis and allow it to retain its well-established community ethos, minimising the impact on community cohesion. As recognised by the NPPF and emerging Borough Local Plan, the achievement of sustainable development requires consideration of the **environmental, economic and social** impacts when weighing up the appropriateness of a development proposal.

66. Therefore, taking into account the points made above, the Parish Council oppose this proposed development on the basis that it fails to meet all three dimensions of sustainability as defined within the NPPF and as such the Appeal should be dismissed.
67. Alderton Parish Council is actively engaged in finalising its Neighbourhood Development Plan^[16] and this will include possible new sites should there be a need to have any further development. The preservation of social cohesion and proportionality will be key features in a proactive but local response to development.

To summarise:

68. Alderton Parish Council, speaking on behalf of villagers, considers this development:
- to be out of proportion to the size of the village;
 - would harm social cohesion in the village;
 - is inconsistent with the findings in March 2015 of the Inspector in his dismissal of the proposed Saint Margaret's Road development;
 - is unnecessary in terms of required housing development in Alderton;
 - does not promote economic sustainability and would cause traffic problems;
 - would harm the environmental setting; and
 - has design flaws.

The Parish Council wishes to see Alderton evolve over the next twenty years, through smaller scale developments, these will be the "right types of development" for our community. We want to see developments, which are in the right place, and are sensitive to the local character, environment and biodiversity.

This is what we have been mandated to deliver for our neighbours and friends.

The Localism Act (2011) inspired the Parish Council and Alderton residents to feel optimistic about the evolution of the place where we live - we aspire to influence the future of our community. We want to be allowed the opportunity to do this.

Allowing this development to proceed will crush this community's aspirations.

Appendices

- [1] Appendix 1 - Appeal Reference: APP/G1630/A/14/2222147
- [2] Appendix 2 – Appeal Reference APP/G1630/A13/2209001
- [3] Appendix 3 - Opening Address on behalf of Alderton Parish Council, Inquiry 20/23 January 2015
- [4] Appendix 4 - Statement by Ian Armishaw on behalf of Alderton Parish Council, Inquiry, 20/23 January 2015
- [5] Appendix 5 - Closing Statement by Holly Lockley on behalf of Alderton Parish Council, Inquiry, 20/23 January 2015
- [6] Appendix 6 - Alderton Parish Consultation Outcomes Report 2013
- [7] Appendix 7 - Alderton Matters Survey results 2014 (percentages, covering letter & survey questionnaire)
- [8] Appendix 8 - Tewkesbury Borough Plan Background Paper: Approach to Rural Sites
- [9] Appendix 9 – Alderton Parish Council response to draft Borough Plan dated 12 April 2015
- [10] Appendix 10 – letter from Brandon Lewis MP dated 27 March 2015
- [11] Appendix 11 – Diagram showing access issues at proposed development
- [12] Appendix 12 – Landscape & Visual Sensitivity Study, November 2014, Toby Jones Associates
- [13] Appendix 13 - Alderton Design Statement, March 2014
- [14] Appendix 14 - Alderton Parish Council Response to Residential Development at Land West of Willow Bank Road, Alderton
- [15] Appendix 15 - map showing various development proposals that have encircled Alderton in recent times
- [16] Appendix 16 - Draft Alderton Neighbourhood Development Plan (ANDP) submitted to Tewkesbury Borough Council for screening [document to follow]