

# Alderton Parish Council

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Consultation Response to Tewkesbury Planning Application 22/00624/OUT

at

Land East of St Margaret's Drive, Alderton

For

Outline application for the demolition of 16 St Margaret's Drive and the erection of up to 55 dwellings, associated infrastructure, landscape and biodiversity enhancements, all matters reserved except for access from St Margaret's Drive.

Applicants

Rainier Developments Ltd and The Gilder Family

August 2022

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APP/G1630/A/14/2222147

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APP/G130/W/15/3003278

## 1. GENERAL

The Parish Council, and indeed the village, are strongly opposed to this proposed development for many reasons:

It would lead to a further 55 houses in the village on top of the 105 new houses built in the last few years – since 2015. This is completely disproportionate for a small rural village.

It is not provided for in the agreed Neighbourhood Plan

It is outside the village settlement boundary.

It is not provided for in the recently Adopted Tewkesbury Borough Plan.

It is purely speculative and not plan led.

It would further damage social cohesion.

It would significantly damage the landscape in a Special Landscape Area.

It significantly adversely affects the character and appearance of the village.

It will affect the setting of the AONB

It will affect the setting of both Locally Listed and Statutorily listed buildings

Alderton is no longer a sustainable location for another housing estate.

There will be significant impact on highway and transport aspects

On ecology issues, not least that Natural England standing advice requires bat survey data prior to an application determination for the demolition of a house in a high bat active area.

## 2 Rural Village

Alderton is a small rural village nestled at the foot of the AONB. The village has a predominantly east west orientation and is surrounded by an open rural agricultural and pastoral vale.

This village has, until recent years grown organically. Then in 2013 given the villages' questionable status as a Serviced Village in the then emerging Gloucestershire, Cheltenham and Tewkesbury Joint Core Strategy, the village was inundated with a series of applications seeking bolt on housing estates, all located outside the settlement boundary. Two estates were allowed on appeal and subsequently built – increasing the housing in the village by 72 units, being completed in 2017/2018. With estates expanding the village to the East and South.

Two other appeals were dismissed. Most importantly, one of the dismissed appeals (PINS Ref 2222147) related to a very similar land parcel to that now proposed. Appendix 1). Entering an agricultural field to the East of St Margaret's Drive.

The appeal was refused on a number of grounds which are set out in more detail below. Alderton Parish Council continues to Object to the proposed development of this rural field on the same grounds as previously raised by the appeal inspector. In addition, there have

been significant changes in circumstances which further strengthens the Council's reasons for objection. They include

Updated Planning Policy appertaining to the site in the form of the recently adopted Tewkesbury Borough Plan 2011-2031 and the Adopted Alderton Neighbourhood Development Plan 2018

Loss of Services within the village, reducing its sustainability criteria for further expansion

Continued expansion of the village since 2015 with another 28-unit estate allowed on appeal and currently being built out Cala Phase 2 – PINS ref APP/G1630/W/20/3259637

Continued break down in social cohesion due to rapid expansion of the village since 2015

Increased awareness of heritage assets in close proximity to the current proposals with the recent addition onto the identified Local Heritage List of Lower Farm, on the eastern edge of the proposed development.

These changes further emphasise the absolute, harmful and destructive nature of the proposed urban expansion of the village into the historic and sensitive rural landscape.

For the reasons set out below, Alderton Parish Council once again raises significant and comprehensive objections to why another housing estate bolted onto the village is totally unacceptable, fails to comply with many of the Planning Policies set out in the Development Plan, and will have significant and demonstrably adverse impacts which outweigh the benefits.

### 3 Planning Policy Context

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Section 70 (2) of the Town and Country Planning Act 1990 provides that the Local Planning Authority shall have regard to the provisions of the Development Plan, so far as material to the application, and to any other material considerations.

The Development Plan comprises the Joint Core Strategy (JCS) (2017), the recently Adopted Tewkesbury Borough Plan 2011-2031 – which was adopted by Full Council on the 8<sup>th</sup> June 2022, and the Adopted Alderton Neighbourhood Development Plan 2011-2031 – adopted July 2018.

## Principle of development

The housing requirement for Tewkesbury over the JCS plan period is 9,899 – as identified in JCS Policy SP1. Policy SP2 of the JCS apportions part of the Tewkesbury Borough’s overall housing requirement to the Rural Service Centres and Service Villages. The Rural Service Centres will accommodate 1,860 new homes and the Service Villages will accommodate 880 new homes to 2031.

Alderton is identified as a Serviced Village in Policy SP2c.

However, much of this development in Serviced Villages as a whole has already been committed, and we are only at 2022. Indeed, the Local Plan Inspector in her letter dated 16<sup>th</sup> June 2021 acknowledged that already, by April 2020, due to completions – many on appeal – the serviced villages had already provided 1,038 dwellings – more than sufficiently meeting the JCS requirement.

More specifically the indicative figure for Alderton within that 880 figure was given to be 51 according to previous work done by Tewkesbury Borough Council in November 2015.

This has been far exceeded in recent years (since 2015) through a number of edge of, and outside of settlement developments.

In 2011 the village comprised 277 houses

Since then

5 units have been built within the settlement boundaries as infill development in accordance with the Adopted Alderton Neighbourhood Development Plan

72 units have been built in 2016-2018 on fringe estates (Beckford Road – 47; Land east of Willow Bank Road – 25 (cala).

28 further fringe houses now allowed at appeal in 2021 – construction just started as an extension to the existing Cala estate.

This proposal proposes another 55 units outside the settlement. That would mean 160 houses in the last 10 years – a 58% increase – and more than double the figure considered appropriate by Tewkesbury back in 2015

In addition, the site assessments exercise undertaken by Tewkesbury Council when considering appropriate site allocations in 2018 (Preferred Options TBP Housing background Paper) concluded that the application site was not a suitable site for an allocation. As such the brand-new Local Plan – approved just one month ago – does not have any further sites allocated around Alderton given the level of development we have experienced to date.

Whilst the JCS did not disaggregate the housing requirement for the Rural Service Centres and Service Villages and apportion it to each settlement, it did provide a framework for this distribution process to be followed in the preparation of the Tewkesbury Borough Plan, with Policy SP2 requiring that the levels of development for the Rural Service Centres and Service Villages should be proportional to their:

- Size (number of houses)

- Function (availability of services)
- Proximity and accessibility to Cheltenham and Gloucester (distance by road, public transport and bicycle)

And this distribution must also take into account the social, economic and environmental factors which would impact upon the ability of the settlement to absorb the level of development proposed.

Alderton is a small village: its function and range of services has significantly reduced over recent years; and it is one of the furthest villages from Gloucester and Cheltenham in terms of proximity and Accessibility – And the level of development already experienced within the village in the last 10 years has been high – 105 units for a village of 277 already – a 38% increase already. As such Tewkesbury rightly concluded there should be no more allocations for housing in or abutting the village settlement.

Alderton does not fall within those sites identified in RES 1 of the TBP. Given the village has already had a 38% increase since 2015 – the addition of another 55 = a 58% increase overall – cannot be regarded as an appropriate scale of growth to be accommodated within a small village which nestles at the foot of the AONB.

Policy SD10 of the JCS sets out the appropriate locations for new housing development in the JCS area. In particular, where a proposed site is not allocated within either the JCS or Tewkesbury Plan – development will only be permitted if: -

On previously developed land

It is for affordable housing on a rural exceptions site

It is an infilling in an existing built-up area

It is brought forward through a Community Right to Buy to Build Order

There are other specific exceptions / circumstances defined in district or neighbourhood Plans.

The application site is open countryside that lies outside of the defined settlement boundary for Alderton and is not allocated for housing development. The site does not represent previously developed land within the built-up area of a service village; is not a rural exception scheme; and does not represent 'infilling'. It has not been brought forward for development through a Community Right to Build Order and there are no policies in the existing TBLP or ANDP which would allow for the type of development proposed. The proposal therefore conflicts with Policies SP2 and SD10 of the JCS.

TBP Policy RES 2 sets out the principle of permitting development within the settlement boundaries. The site is outside the settlement boundary.

Policy RES3 of the TBP sets out the criteria whereby development outside the settlement boundary would be acceptable

1. The reuse of a redundant or disused permanent building (subject to Policy RES7)

2. The sub-division of an existing dwelling into two or more self-contained residential units (subject to Policy RES8)
3. Very small-scale development at rural settlements in accordance with Policy RES4
4. A replacement dwelling (subject to Policy RES9)
5. A rural exception site for affordable housing (subject to Policy RES6)
6. Dwellings essential for rural workers to live permanently at or near their place of work in the countryside (subject to Policy AGR3)
7. A site that has been allocated through the Development Plan or involves development through local initiatives including Community Right to Build Orders and Neighbourhood Development Orders

The proposed site fails all the above criteria and as such fails Policy RES 3 and the principle of development on this site is absolutely not justified.

This newly adopted Policy RES 3 in the TBP and Policy SD10 of the JCS are fully in line with the NPPF with regards to the appropriate location of sustainable development.

In respect of the adopted Alderton Neighbourhood Development Plan (ANDP) 2018 Policy H1 reconfirms that new housing development in Alderton will be supported if

It is a small windfall  
Infill housing of 1-2 dwellings within existing built-up frontages  
Within the settlement Boundary  
And where it is consistent with the scale, proportion and density of existing houses and gardens in the adjacent area.

Again, the ANDP Policy allows the principle of development within the settlement boundary.

As such, in all respects, the JCS, the TBP and the ANDP all have strong Policy objection to the location of this development on a rural agricultural field outside the Settlement Boundary. The principle of housing development fails.

## Five Year Housing Land supply

The only justification for the developers arguing that this rural, out of settlement site is acceptable is on the basis of Tewkesbury Borough Council not being able to demonstrate five years' worth of deliverable housing sites. As such para 11 of the NPPF and the tilted balance argument is engaged, such that the presumption in favour of sustainable

development applies unless any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies of the NPPF.

Whilst as of the time of writing this objection (July 2022) the Council cannot formally demonstrate a five-year housing land supply, With the adoption of the TBP it is understood from Tewkesbury Council that there are a number of site allocations in the TBP which can be reasonably expected to deliver housing within the next five years. We understand the Council is working on updating this figure and hopes to publish its finding in August 2022 – prior to the determination of this application. We also understand that officers fully expect to be able to report a housing land supply in excess of five years at that point, in compliance with NPPF paragraph 74. As such the tilted balance argument would not arise.

However, even in the unlikely event the presumption of sustainable development as set out in Para 11 of the NPPF does apply – for the many reasons set out below we continue to object on the grounds that the adverse impacts of allowing the development proposed would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.

#### 4 Relevant Planning History including Historical Refusals/ dismissals and withdrawal.

Following the establishment that the principle of development is not established given the site falls outside the settlement boundary of the village and fails the strategic and location policies set out in the JCS, TBP and the ANDP – a good starting point is assessing the level of harm caused by this development is to review the historic planning applications on this site which have been refused, appeals dismissed and withdrawn.

LPA ref 13/00734/OUT and Appeal APP/G1630/A/14/2222147 – Outline for 60 dwellings land east of St Margaret's Drive.

Historically the site formed a large part of a previous application for 60 dwellings (LPA Ref 13/00734/OUT). The application was refused by Tewkesbury and was subsequently dismissed at appeal PINS ref APP/G1630/A/14/2222147 dated 17<sup>th</sup> March 2015.

The reasons for refusal related to: -

- Significant harm to the those approaching from the south and south east through the loss of open pasture (Para 23) resulting in harm to the character and appearance of the area

- Adverse effect on the rural quality of the landscape and detrimental to the setting of the AONB (para 24)

- Disproportionate effect on the village in terms of cumulative impact of development and also on the social wellbeing of the community. (Para 35)



These adverse impacts remain and are significant as they are the measurable environmental and social adverse impacts to landscape and social wellbeing of the community. These significant adverse impacts and issues are as relevant today as they were in 2015 for the reasons set out in more detail below.

On impact on Landscape character, AONB

The Appellants Planning Consultants seeks to argue that the current scheme addresses previous concerns because: -

The previous scheme included a land parcel to the east of Blacksmiths Road, within which the existing PROW (specifically the part of this that is included in the Winchcombe Way) is located. This submission does not now propose to include any built form within this field parcel; a key change which is considered to address the previous issues raised in terms of the impact of the development on the character and appearance of the area, the extension of built form into the adjoining countryside and the impact on the setting of the AONB.'

Firstly, whilst a small element of the historical appeal scheme located to the north of Lower Farm has been removed, this has been replaced with a significant extension of the western half of the site extending southwards, so that a similar level of development is proposed on this rural pastoral landscape. (Now 55 units in replacement of the previous 60 units).

By significantly extending the built form southwards, this urban intrusion into the rural landscape becomes even more visible from both close and longer distance views from the south towards the historic core of the village, and becomes even more intrusive on the setting of the AONB, which extends down to the northern edge of the village.

The site lies within the Special Landscape Area extending between the AONB areas of Alderton and Dumbleton Hills to the north and Dixton and Oxenton Hills to the SW. In particular in the Landscape and visual sensitivity studies carried out in 2014, this particular location falls within an area of medium landscape sensitivity and high visual sensitivity.

The Inspector when considering the landscape, the AONB and the character of the area concluded

The site is not on the fringes of the rural character area but very much part of it (para18)

Alderton does not act as a barrier between the AONB and the site – but is part of a contiguous landscape (18)

The development of the site would impact on the setting of the AONB through a loss of openness and pasture use. (18)

The built form proposed increases the impact as identified by the inspector. Views towards Oxenton and Dixton AONB from the northern part of the Winchcombe Way would be severely impacted, and views from the south and SE would continue to cause significant harm given the proposed development would change the overall experience of those enjoying the countryside due to loss of open pasture and introduction of built development.

As such the development would fail to comply with Policies LAN1 – Special Landscape Areas and LAN2 – Landscape Character.

The Inspector also considered that east- west principal pattern of development in Alderton would be lost with such a bolt on location of a scheme – this objection remains.

On the issue of impact on the setting of the AONB – this again fails Policy SD7 of the JCS

Further information on our detailed objections on the landscape and the Impact on Character of the area is set out below.

### Planning application 21/00105/PIP – permission in principle for 4 houses

This application considered last year but subsequently withdrawn before Tewkesbury made a decision on its merits, was for an ‘in principle’ scheme for four houses on part of the current site – albeit accessed via Blacksmith Road and once again outside the village settlement boundary.

The justification for that reduced scheme was set out in the appellants Planning Statement. The planning consultant felt a larger scheme – such as the one now again proposed, would be ‘viewed as a ‘bolt on’ to the village ‘ (para 1.8), and acknowledged the reasons the 2015 appeal had been dismissed, being:- harm to the character and appearance of the area, and extension of the settlement into the adjoining countryside, effecting the setting of the AONB; and would have a disproportionate effect on the village in terms of the cumulative impact on the social wellbeing of the community.

We concur with these views.

## 5 Archaeology, Heritage & Historical core of the village

Previous Archaeological excavations have been carried out by Cotswold Archaeology in 2013 on a section of the site for a previous application for a similar number of houses. This application was refused and the subsequent appeal dismissed as noted above.

Excavation revealed activity and artefacts from earlier Prehistoric (Mesolithic to Bronze Age), Middle Iron Age, Saxon, Mediaeval and Post Mediaeval periods with mediaeval ridge and furrow ploughing system over the whole site.

Whilst we acknowledge that the report from Mr Charles Parry, Chief Archaeologist for Gloucestershire notes that the artefacts were not in the first order of preservation (largely due to repeated ridge and furrow ploughing since the mediaeval period), he did note that “The archaeological evidence therefore demonstrates intermittent activity and settlement over a lengthy period, with the later prehistoric and Anglo-Saxon periods especially well represented. In our view, the archaeological deposits present on this site have the potential

to make a significant contribution to our understanding of the archaeology of Gloucestershire, and indeed the wider region”.

It is noted that the County Archaeologist has responded to the current scheme and raises no objections in principle subject to a further Programme of Works for the assessment of the land to the southern end of the site which did not form part of the previous 2013 application. We fully support this additional survey requirement.

## Character, appearance and style of the historic village

Policy RES5 New Housing Development states “Proposals should be of a design and layout that respects the character, appearance and amenity of the surrounding area and is capable of being well integrated within it”. On the contrary, this development would be a “bolt on” of modern buildings, jarring against the traditional stone buildings, many of which are bungalows, which would border them.

Despite the applicant’s many descriptions about the location of important and historical village buildings, they do not seem to have taken these into account when describing the planned development as “sensitive” and which will “compliment the style of the village. This development would be extremely close to the historic core of the village and in very close proximity to several Grade II and Grade II\* listed buildings including the village church, and as it would involve building modern style properties using modern materials, it would not be in keeping with the style and appearance of these historical buildings but would be detrimental to the character of this part of the village.

The historical part of Alderton with its 12<sup>th</sup> century Grade II\* Listed Church and buildings from as early as the 16<sup>th</sup> century, is a major contributory factor to its appeal and is enjoyed by hundreds of tourists every year looking to escape from the hustle and bustle of modern life and enjoy a break in a traditional Cotswolds village, with its quiet roads and fields leading into the village. In particular from far reaching views across fields to the south of the village, from the road and the Winchcombe Way- the church’s wider setting is that of a rural landscape and historic village core.

Whilst it is noted that Historic England have limited objection to the impact on the setting of the church believing primary entrance of the church to the north is the principal aspect from which the church is experienced, we respectfully disagree. Most people who experience the church are approaching it from the south across open countryside and will then travel across the southern part of the church yard to elsewhere in the village – most likely the Gardeners arms. As such the significant intrusion of built development into this main setting is the principal aspect by which this most magnificent of Grade II \* churches is experienced. Similarly affected are the other listed buildings which lie along the southern edge of the village.

This proposed development would significantly and adversely affect the views of the landscape to and from these properties, enjoyed for several centuries and just as

importantly by the numerous and frequent users of the Winchcombe Way entering the village from this historic footpath, creating a beneficial visual amenity for visitors.

Visitor reviews for Grade II Listed Bells Cottage, Church Road support this – photos of this property and its doorstep location on the Winchcombe Way are shown in the applicant's report:

Source: TripAdvisor

May 2022 - The village of Alderton is very quiet with few tourists, unlike some Cotswolds villages. It has one little village shop/post office (1960s style). We found several walks straight from the cottage which didn't require us to drive.

Feb 2022 - Stayed here for the first time in February, truly takes you away to a different place, cosy, warm traditional Cotswold cottage, everything you would want in a cottage, it takes you away from the outside world, cannot wait to go back again and again.

November 2021 - This was our fifth visit to Bells Cottage and our experience was as wonderful as ever. This thatched cottage is a little bit of paradise in a wonderful location.

Sept 2020 - Very peaceful and comfortable. The garden is ideal to relax within and enjoy the utter peace of the location. There are many various walks starting from the village which makes the cottage ideally placed for rambling across the countryside with or without your family dog.

Sept 2020 - What a wonderful stay. We enjoyed the peaceful and tranquillity, the sound of birdsong, lack of traffic...

June 2019 - Bells Cottage is an absolute dream.... from the moment we arrived and gazed upon this beautiful Cotswold gem we were smitten.... the property is so quintessentially English. The location is amazing, so good it could be in a film.

March 2018 - Perfect for a couple looking for some fresh air and peace and quiet. The cottage itself was a beautiful old, thatched cottage, located in the tiny village of Alderton, on the edge of the Cotswolds.

The applicant refers to nearby “diminutive Church Cottage,” a black and white property with views over the proposed site. This seems to be a rather patronising description of a detached, Grade II Listed, 17<sup>th</sup> century black and white thatched cottage that may seem insignificant to the applicant but is in fact an important, established heritage asset to the village, having been occupied in the late 1800s/early 1900s by a renowned local resident (Bertha Nind) about whom a book has been published containing diaries about her life at the cottage (Source: Bertha Nind – The Diary of an Alderton Girl by Ian Rankin)

Church Cottage was featured on the BBC website as part of Alderton being awarded BBC Radio Gloucestershire's “Village of the Week”, presented by Dom Cotter. He describes it “a village proud of its agricultural heritage” and shows the Cottage (Figs. 3 & 4) with photos

from the front and the rear with views across the proposed site and towards historic Dixon Hill.

Fig. 3



Fig. 4



For several hundred years, the cottage has enjoyed uninterrupted views from both bedroom and garden of the surrounding historical agricultural land and towards Dixon Hill. This cottage is a perfect example of how a property, by its very history, style and aesthetic value can “compliment the style of the village” and be an integral part rather than an “add-on”.

Close to Church Cottage, and three houses along St. Margaret’s Road are two red brick properties with 17<sup>th</sup> Century origins, which although they do not feature in the applicant’s list of Listed buildings, still make a considerable contribution to the historical fabric of this part of Alderton, with windows of architectural note and interest, and would face directly on to the proposed new houses on the site producing a jarring juxtaposition of opposites in this part of the village.

A major point of concern is that the applicant has completely ignored and failed to mention the recent addition of Lower Farm, Alderton – onto the Tewkesbury Local listings of building of historic and /or architectural note. This property lies adjacent to the site in question and in very close proximity to the proposed development. The entry on the Local Heritage List demonstrates its historical relevance and importance not only to the village of Alderton and its own landscape, but also nationally:

Source: Tewkesbury Borough Council Heritage List

“Lower Farm, which is on the South East edge of the village adjacent to the Winchcombe Way, is the only remaining farm from the 17th Century which is still in situ in its original agricultural setting, and which has not been subsumed into the many and various building expansion phases of the community.

(This would no longer be the case if the proposed housing estate were allowed)

In the field to the east of Lower Farm lie the ruined foundations of a similar building which demonstrate how easily such important historical sites can be lost. It can be seen from many vantage points and forms part of a beautiful and historic landscape which should be preserved.

It has had several phases of additions over the centuries, most notably in the 18th, 19th and 20th centuries. Each addition has been created in the vernacular style of its period and so the evolution can be clearly seen. The northern end is the oldest part and is of a post-medieval square-framed, timber construction with intact wattle and daub infill panels dating from the mid-17th century. Inspections of the structure, particularly in the roof void reveal it to be a relatively rare two-room plan hall house which had an external brick and stone chimney; a design which traces its origins back to medieval times.

Referenced in the book *Discovering Timber Framed Buildings* P 50/51 by Richard Harris ISBN 0 85263 481 1

Downstairs has an interesting original large flagstone floor which is possibly made from materials salvaged from the dismantling of nearby Hailes Abbey.

Outside, there are signs of foundations of other buildings which may yield interesting archaeological findings as well as two intact and functional medieval wells.

To the south, there is an ancient cider apple orchard established on a medieval ridge and furrow field.”

The significance of Heritage Assets cannot be ignored as the definition itself (from Glossary: National Planning Framework, Dept. for Communities and Local Government 2012) states

“A building, monument, site, place, area, or landscape identified as having a significance meriting

consideration in planning decisions because of its heritage interest. Heritage Assets include designated heritage assets and assets designated by the local planning authority including local listings.”

Part of the criteria for selection on the Tewkesbury Borough Heritage list includes

“Assets, which, due to their scale or location, stand out positively in their surroundings or contribute to the visual amenity locally.

Their position might be.... on a site where they can be seen in longer views”.

The view of Lower Farm would be significantly and adversely reduced or removed, would no longer stand out positively in its surroundings but would be obscured by a modern and unsympathetic building development.

In relation to the National Planning Policy Framework (NPPF) Tewkesbury Borough Council also states:

“Local heritage assets are not included in the national list of buildings of special architectural or historic interest and are therefore not legally protected by statutory designations - they are not formally protected by law. However, the National Planning Policy Framework (NPPF) states that local planning authorities should give consideration to undesignated heritage assets:

“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.” (Para 197, NPPF, MHCLG, February 2019)

Therefore, whenever decisions are made on development proposals which affect buildings, structures, archaeological sites or parks and gardens included in the Local Heritage List, the significance and preservation of these assets will be given special consideration during the planning process.” (Source: Tewkesbury Borough Council – Local Heritage List)

Alderton’s heritage and its place in local history can be identified very clearly in acclaimed paintings which now hang in The Cheltenham Gallery. The Dixton Paintings showing the common meadow and open fields of Alderton are considered to be extremely accurate topographically, providing a clear picture of the landscape towards the village in the early 18<sup>th</sup> century.



Centuries later, the historical part of the village and the beauty of the surrounding AONB landscape is still a magnet for walkers and ramblers with published walks celebrating the historical views towards Alderton from outlying towns and villages, unencumbered by large scale development to the south of the village and cementing its important position in local heritage.

To conclude, Historic England writes:

“People today live and work in these landscapes, actively managing and safeguarding them for future generations.

Millions of people spend their free time enjoying England’s magnificent countryside. As a nation it fills us with more pride than the NHS (DCMS Taking Part 2015)

We go there to spend time with our families or to find some peace from our hectic lives. We go to improve our physical and mental health, to recharge our batteries.

It’s not just the natural beauty of our countryside that makes it so special but also our heritage.”

When considering the impact on our heritage – Para 197 of the NPPF confirms that Planning Authorities should “take into account the desirability of sustaining and enhancing the significance of heritage assets.

Policy SD 8 of the JCS seeks to protect the historic environment. Criterion 2 and 3 “Development should make a positive contribution to local character and distinctiveness, having regard to valued and distinctive elements of the historic environment” and “Designated and undesignated heritage assets and their settings will be conserved and enhanced as appropriate to their significance, and for their important contribution to local character, distinctiveness and sense of place”

Policy HER2 of the newly adopted Tewkesbury Local Plan similarly seeks to ensure there is no adverse impact on Listed buildings stating: - “Alterations, extensions or changes of use to Listed Buildings, or development within their setting, will be expected to have no adverse impact on those elements which contribute to their special architectural or historic interest,



including their settings. Any proposals which adversely affect such elements or result in the significant loss of historic fabric will not be permitted”

For the reasons set out above, the development, through the harm identified to the designated and undesignated heritage assets and to the character of the historic village – is contrary to the aims and objectives of the NPPF, and the Policies in the JCS and Tewkesbury Local Plan.

## 7 Landscape harm and Setting of AONB impacts



The adopted Tewkesbury Borough Plan, LAN1, says that proposals for new development:

- should not cause harm to those features of the landscape character which are of significance;
- should maintain the quality of the natural and built environment;
- should seek reasonable opportunities for the enhancement of landscape character.

It also says that “where a proposal would result in harm to a Special Landscape Area having regard to the above criteria, this harm should be weighed against the need for, and the benefits from, the proposed development.”

This site is in a Special Landscape Area and the Parish Council believes this proposal does cause harm, does not maintain the quality of the environment and does not enhance the landscape character.

The first point is that this site is huge, over 9 acres, possibly equivalent to about 15% of the existing village [ including the new Cala development] and it is good pastoral land that will be lost to suburban residential development.

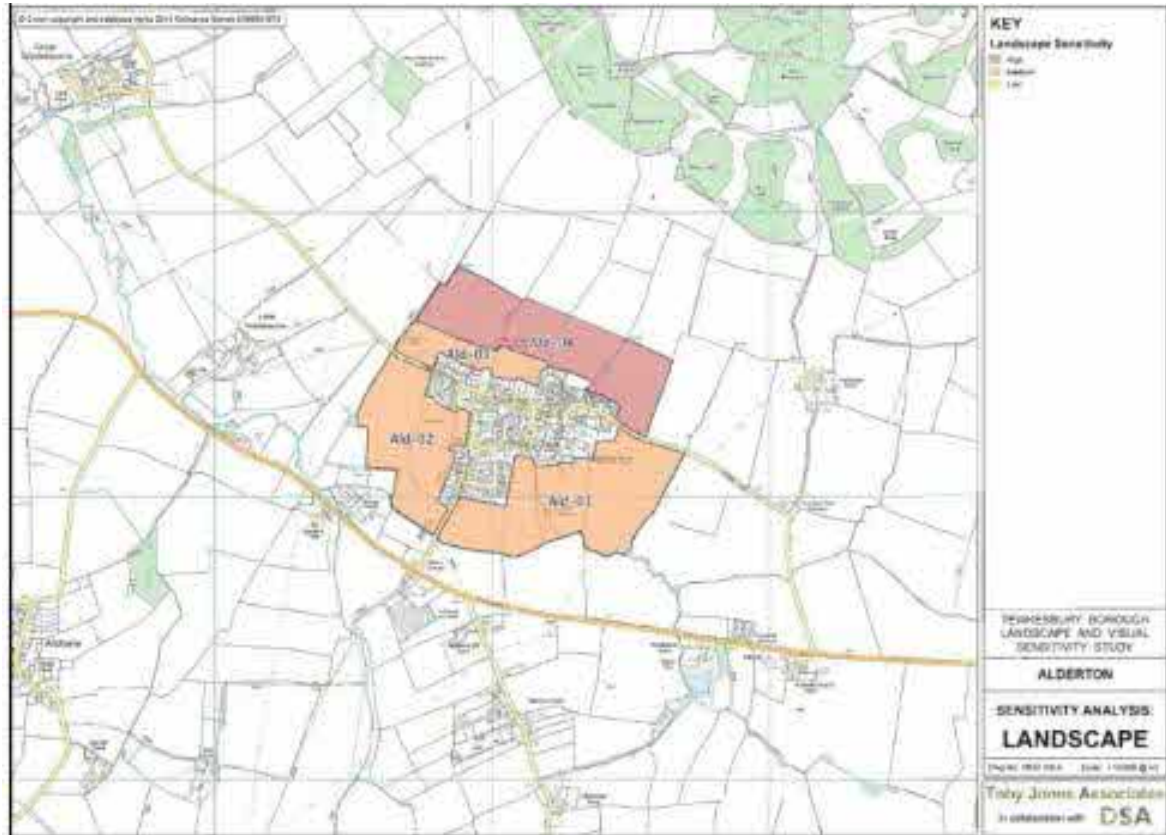
As was mentioned in Section 4 above, a previous planning application proposed the construction of 4 houses on the same site. At para1.8 of that Planning Application it was said that 'scale and location of proposed development [4 houses] will enable it to be assimilated into the existing settlement pattern, rather than be viewed as a 'bolt on' to the village as was the case with the previous application [60 houses]. This statement is directly contradictory to the reinstatement of a large-scale proposal along the lines of the first application creating such a bolt on.

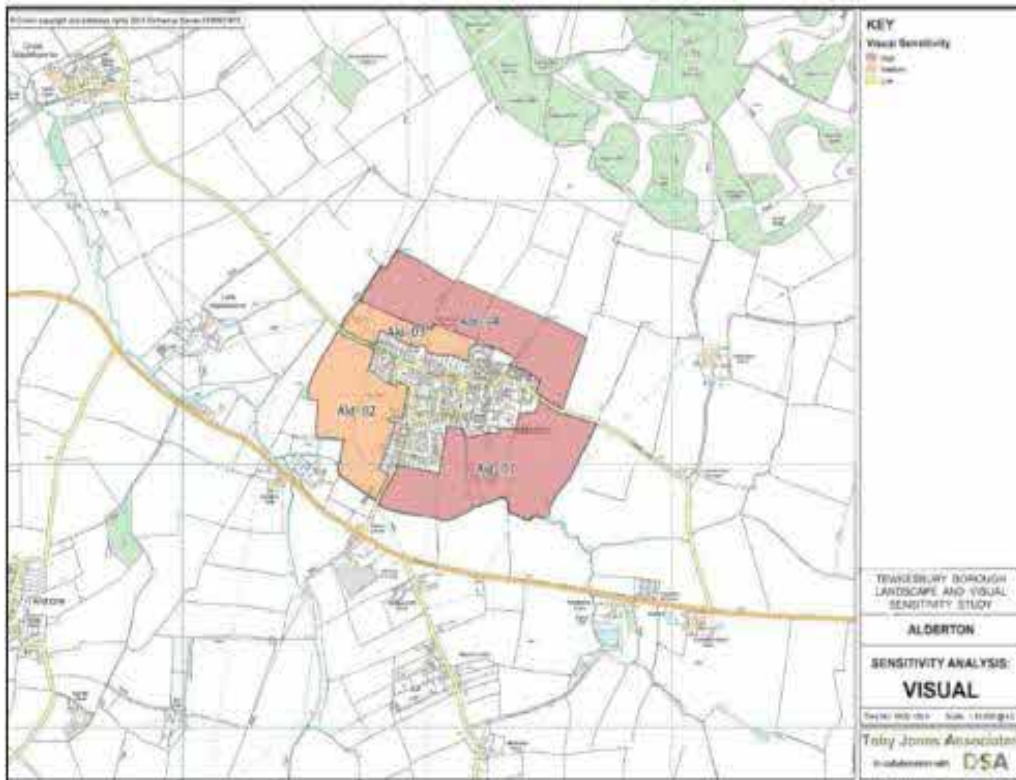
This site is very similar to the site that Inspector Jarrett commented on in the Appeal he heard in 2015. [Appendix 1]. Admittedly it is now a north to south plot rather than an east to west one but from a landscape perspective it has the same characteristics. Paragraphs 12 to 25 of his report are his commentary on landscape and his conclusion was:

"I have found harm in terms of the effects of the proposed development on the character and appearance of the area as it would lead to the extension of the built-up part of the settlement into the adjoining countryside and affect the setting of the AONB. This would conflict with the aims of Policy LND2 of the Local Plan and the Framework. This is an adverse impact to which I attach considerable weight."

A starting point to this is the Landscape Sensitivity Study undertaken by Toby Jones in 2014 for Tewkesbury Borough Council and referred to in the Developer's Landscape and Visual Study [LVS]. Below are the maps he produced for Alderton showing that this area Ald 01 had Medium Landscape Sensitivity and High Visual Sensitivity. Visual Sensitivity is therefore at the same level as the Area of Outstanding Natural Beauty [AONB] to the north. As a point of comparison, of the other 12 Service Villages on the list, only one

other, Coombe Hill, had such high levels. Note that this assessment applies to all Ald 01 and therefore the whole revised site.





In his commentary on Ald01 – this site – Toby Jones commenting on Landscape Sensitivity refers to a pastoral landscape which relates well to the surrounding vale and there is reasonable time depth. He also notes that the openness between the settlement edge and the small stream remains an important characteristic.

Whilst the rural landscape around Alderton is a mixture of arable and pastoral fields it is now heavily arable and this is one of the few remaining pastoral fields. This proposal will remove that pastureland and run up close to the stream effectively destroying that openness between settlement and stream.

On Visual Sensitivity, Toby Jones refers to the preservation of views to the historic village core and the church, to protect the visual relationship between the historic village core and the slopes down to the stream and the visual link to the B4077. He says that development on this parcel could bring about a notable change in the settlement pattern and its relationship with the surrounding countryside.

Whilst there will be no development immediately south of Church Road what is now an immediate vista of open country and Lower Farm when you reach the end of Church Road, cross the stile and follow the Winchcombe Way, will be clouded by a huge modern estate on the right as you walk south through the field. This will seriously affect views to the south and bring about a notable change in settlement pattern.



The Alderton Neighbourhood Plan [ Policy LC2] places importance on preserving significant views in or out of the settlement. It identifies views from Church Road and St Margaret's Road to the Cotswolds AONB as the fourth preferred view in the area. 132 residents voted for it. The view south from Church Road towards Langley Hill will not be affected if you just look straight ahead but an inevitable mere turn of the head to the right will reveal a housing estate instead of a pastoral field intervening. The second photograph below of the view south from St Margaret's Road will be completely altered. To the right of the gate will be not a green field but a housing estate.



There is a mention in the LVS of the Monarch's Way. There is confusion here. The Monarch's Way does not go near Alderton. However, the Winchcombe Way does and this is a nationally recognised trail. The Way approaches Alderton in the next field to the proposed site. In the original proposal for this site-built development ran close to the footpath and attracted damning criticism from Inspector Jarrett:

“However, from closer public viewpoints, such as from points on the Winchcombe Way on the edge of the village or when approaching the site from the south and south east, the proposed development would change the overall experience for those walking through the countryside due to the loss of open pasture and the introduction of built development. I consider that this would cause significant harm.”

It is obviously accepted that the development is now in the next field to the proposed site. However, it is for part of the Way in clear sight, with the same loss of open pasture and introduction of built development, and these comments from the Inspector are still considered valid.

The author of the Winchcombe Way has strongly objected to this proposal

“Dear Sirs,

I am writing to oppose the recent application to build on the edge of Alderton.

As the creator of the Winchcombe Way trail which has featured in guide books, tv and walking magazines I created the trail to introduce walkers to what was the quiet outliers of the Cotswolds i.e., Alderton and Dumbleton.

Since creating the trail new development on the west of the village has encroached up to the trail, degrading the experience of users of the trail. (Signage is still damaged from the previous developers building up to the right of way).

Now the latest application is proposing a similar experience on the eastern edge of the village and would detrimentally degrade the experience to basically walking the urban fringe of the village. Walkers currently approach the village through natural countryside and relish the experience of the natural landscape. The documents mention improving a biodiversity site adjacent to the Winchcombe Way. However, I cannot see any mention of who or how the future management of the improved biodiversity site would be maintained going forward. (D Gray GCC Lead on Environment has mentioned publicly that a high proportion of new trees planted fail to survive due to neglect).

The proposed development extends in parallel to the approach to Alderton and I feel would infringe on the visual aspect especially towards the outline of the Malvern s to the west.

I also query the accuracy of some of the documents submitted. There is reference to the Monarchs Way (Opportunities and Constraints) which to my knowledge does not go anywhere near Alderton and must reflect on the quality of the documents submitted.

Yours truly”

The LVS says that the approach to the historic centre will be maintained but that is not the case. Walkers will see, to their left, an extensive suburban estate before they enter Church Road and come into, as Inspector Jarrett describes it, “the most historically picturesque part of the village where St Margaret’s Church is a local landmark building.” Those leaving Church Road will be greeted by the same estate to their right rather than views over pastoral fields. The Winchcombe Way was featured in a travel article in the Guardian on 21 July 2021 and this included a stop in St Margaret’s Churchyard:

“For instance, the Winchcombe Way’s western loop treads totally different ground, leading us via wooded slopes and quiet villages off the traditional tourist trail. We climb up Langley Hill and drop to the thatched houses of Gretton. We rest on a bench at Alderton’s medieval St Margaret’s Church, watching gravediggers at work. We meet Patrick Leigh Fermor at Dumbleton. At times, the toots of the Gloucestershire Warwickshire Steam Railway resound through the valley; by chance, we reach Gotherington Halt just as a train puffs by.”

Country Walking Magazine said of the Winchcombe Way “Can anything make the Cotswolds more beautiful? Meet the brand-new trail that’s aiming to try.” This proposed

estate will hardly help that proposition or the experience of those stopping off in St Margaret's Churchyard.

There are also views to be considered from the AONB to the south and the question of whether the site forms part of the foreground setting to the AONB. Para 5.17 covers the view from a different section of the Winchcombe Way skirting Dixton Wood to the south and says "The southern and eastern halves of the site's interior are visible within the view". Whilst Inspector Jarrett did not think the impact of views from the southern AONB towards Alderton would be significant he was commenting before the first site off Willow Bank Road was developed. The second site is now being built behind it and the southern aspect of the village is becoming suburbanised and more visible. The addition of this new site will increase the feeling from any viewpoint in the south that the village is not a Cotswold/Vale settlement but a dormitory modern estate.

Paragraph 3.12 of the LVA places much emphasis on the following comment from the Inspector who held the previous appeal upon the site [ Inspector Jarrett].

"Seen from the south and higher ground at Gretton, Alderton would still be read as a clustered settlement surrounded by an open belt of open countryside. Thus, Alderton would maintain the sense of being a self-contained settlement within a wider rural landscape. In this context, I consider the scheme would be sensitively located and designed so as to avoid adverse impacts on the designated area of the AONB."

However, this is completely misleading because it is not a quote from Inspector Jarrett's report. This comment therefore needs to be ignored.

On the link between the AONB to the north and this site, in the Special Landscape Area, Inspector Jarrett said:

"It is not on the fringes of the rural character area but very much part of it. I do not consider that Alderton acts as a buffer between the appeal site and the AONB but is part of a contiguous landscape. The appeal site and its setting consist of features characteristic of both the SLA and the AONB landscape. Although the AONB is higher ground with the SLA as a lower vale, the appeal site is seen as forming part of the gentle slope that falls from the AONB. The development of the appeal site would impact on the setting of the AONB through a loss of openness and pasture use."

The LVS [7.45 and 7.46] identifies that this proposal causes a high magnitude of change and as such a major adverse level of effect at both years 1 and 15 for residents of Fletcher Close and St Margaret's Drive. It identifies "a major adverse level of effect at Years 1 and 15" for residents of St Margaret's Road. These are considerable impact statements which should have a bearing on this application. Church Cottage, a grade 2 listed building on St Margaret's Road, is particularly affected. Below are photographs taken from an upstairs window and from the garden showing a current outlook of pastoral scenery that will be replaced by a view of houses.





The LVS rather surprisingly only identifies a “major-moderate” adverse level of effect at years 1 and 15 for residents of Lower Farm. The Parish Council’s view is that the impact is MAJOR. The Study suggests that the main line of focus is to the east away from the development but that is not the case. The front door faces west towards the development as does the kitchen window and a large seating area. The report accepts that planting will have little impact on screening until year 15. The development will have a major impact on the residents.

In addition, Lower Farm has a historical context in the landscape of the village. It is one of the original 6 farms in the village and one of only two [ the other being Frampton Farm] which retain a surrounding of agricultural land. The setting is all important and is more important now that Lower Farm has been awarded Local Listing status by Tewkesbury Borough Council Inspector Jarrett commented [ para 19] that the original proposal would lead to a coalescence of Alderton and Lower Farm and an increase in the suburbanised character to the village not readily reflected by the morphology of Alderton with its small-scale infill and layout reflective of the historic road form. Inspector Jarrett also commented [ para 20] on large negative effects for Lower Farm.

The commentary in the LVS also suggests a mitigating factor for Lower Farm is a public open space between the farm and the development, but the chances are this will be a stretch of mown lawn reminiscent of greenery in a suburban estate and not comparable with the open pastoral land which currently surrounds the farm.

A major characteristic of Alderton is that it is not a village on the main road. There is a parcel of rural land which separates the two and gives the village a visual independence from through traffic. The Toby Jones study identified that the sense of separation between Alderton and the B4077 was characteristic and vulnerable to insensitive development. This proposal brings development close to the stream edge across a large field and correspondingly closer to the B4077.

Para 5.24 of the LVS says that “For receptors travelling along the B4077, 166m to the south of the site at its closet point, views of the site are open and clear and seen against a backdrop of Alderton and alongside recent development of Fletcher Close. Open views like this are available for 1 km of the route.”

The B4077 is one of the few west to east access roads to the Cotswolds and car passengers have to date been able to look up and see Alderton Village nestled in front of Alderton Hill as part of their introduction to the Cotswolds AONB. This has been affected already by the Willow Bank Road development but the character of this view would be

further damaged if this development were to go ahead. This is considered to be of Maximum Sensitivity.

### View towards Alderton from B4077



There are comments about how mitigation planting will improve views for receptors by year 15 but that is a significant time ahead and in the Parish Council's experience new tree planting is often poorly or not undertaken and takes longer than anticipated to have any effect. In addition, as the owner of Lower farm points out in his objection, screening by green leaves is only present for half the year

There are general comments in the LVS about green space including areas for community walking and play features and open space around existing residences. This is obviously better than an increase in the housing density but is still a green feature of a modern estate not open pastureland. The Gloucester, Cheltenham and Tewkesbury Joint Core Strategy [SD4] refers to new development respecting the character of the site and its surroundings and to protecting the landscape character for its own intrinsic beauty. This is not achieved by simply having a few open spaces.

The LVS concludes by referring to the proposed residential development as small- scale and visually discrete. That is just not the case.

In conclusion, the Parish Council considers that the development would HARM the landscape:

- By replacing pastureland in a Special Landscape Area with the built form
- By ignoring the high designations placed upon the quality of the landscape and its visual sensitivity
- By completely changing the setting of two historic buildings – Lower Farm and Church Cottage
- By having a high impact of detrimental change for residents of St Margaret's Road, St Margaret's Drive and Fletcher Close
- By impacting on the setting of the AONB
- By closing the historical separation with the B4077.

The Parish Council also notes the letter received from Cotswolds National Landscape (Letter No 105) who have raised a holding objection until further information is received in order for them to fully assess the impact of the proposals on the setting of the AONB, its associated tranquillity characteristics, and impact on its dark skies.

Indeed, Natural England have also advised in their response letter that the advice of the local AONB Partnership / Conservation Board is invaluable in the decision-making process as they have more specific knowledge of the site and its wider landscape setting. Similarly, they also advise that the local Landscape Character Assessment should further inform the process. Both raise concerns over the impact on the AONB and the landscapes sensitivity to this type of development – which can only conclude that there is significant impact on the AONB and local landscape setting.

Thus, the scheme fails to comply with Policies SD6 (Landscape Impact), SD7 (Cotswolds AONB) SD8 (Historic Environment) of the JCS and Policies HER2 (Listed Buildings), LAN2 (Landscape Character) of the TBLP.

## 8 Social Cohesion – Effect on the village and the Community

The background to this is that in a village of 277 houses in 2011:

5 more have been built through infill;

72 more were added on fringe estates [ Beckford Road,47 and Land East of Willow Bank Road, 25] by 2017.

The second development East of Willow Bank Road means a further 28 houses are now being built

This proposal is for a further 55 houses.

In total if this proposal were approved it would mean an extra 160 houses or a 58% increase in 10 years. In terms of people, we are awaiting the outcome of the 2021 Census but we

estimate that, if this proposal were accepted, it would overall lead to about 400 new residents moving into a village of 747 [ 2011 Census].

This is a completely disproportionate growth. Alderton is a rural settlement in a vale between Cotswold hills which has grown organically over centuries. We are about to see that destroyed in favour of a dormitory suburban community completely out of place with other villages in the area.

Paragraph 5.18 of the Planning Statement says that “Continued growth at the Settlement will help support strong vibrant, healthy communities in accordance with both national and local policy.

The NPPF indeed recognises the need to support vibrant and healthy communities [ chapter 8] and that planning decisions should promote social interaction [ par 91]. Para 91 refers to the need to promote social interaction opportunities between people who might otherwise not come into contact with each other.

Various Appeal Inspectors have commented on the importance of considering social cohesion in their decisions on developments in Alderton. In particular the original Appeal Decision on Land East of St Margaret’s Road - APP/G1630/A/14/2222147, paras 26 to 35 (Appendix 1), and the Appeal Decision- APP/G130/W/15/3003278, paras 9 to 32, Land West of Willow Bank Road (Appendix 2) considered social cohesion, in the former appeal, concluding at para 35

“I conclude on this issue (social cohesion) 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.”

Both Inspectors acknowledged that Alderton is a small rural settlement which has grown organically and slowly over a period of time. Both considered the capacity and capability of the settlement to absorb change had been reached and the two appeals were refused.

In particular in the first Appeal Decision covering much of this same site, Inspector Jarratt noted:

- i) that the residents place a high value on maintaining and planning for their community and that they are concerned about the cumulative effect of the appeal scheme [para 27]
- ii) that the village would appear more suburbanised and less of a rural settlement and it would be adversely affected as a consequence [ para 30]
- iii) 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 the existing residents [ para 33] of the village.

Since that time, 2015, there have been 25 new homes built and a further 28 being built – effectively close to the same number that Inspector Jarrett was commenting on – and now there is a proposal for 55 more.

The Parish Council does not accept that another major development will promote social cohesion within the village.

It has the experience of judging the impact of new development since the completion, in 2017, of the two estates on the fringe of the village. 72 new homes were built bringing say between 170 and 210 new villagers. After 5 years if these developments had promoted good social interaction, you would expect more evidence of it.

One area of moderate integration is the Allotments There are 84 occupied plots of which 16 are from recent developments. The Allotments are very close to one of the new estates and gardens with modern houses are typically smaller than average.

However, in other respects:

a] the village shopkeeper in his report to the Parish AGM in 2022 said, about the lockdown, “We also had new faces from new houses for a while. I was hoping they carry on supporting the shop, after few visits, sadly this did not happen.”

b] none of the Parish Councillors [6] is from the new estates. A vacancy has been advertised widely but not yet filled;

c] none of the local Primary School Governors [9] is from the new estates. Again, there is an unfilled vacancy, much effort has gone in to trying to fill it;

d] only one of the members of the Village Hall Committee [ 9] is from the new estates;

e] none of the members of the local church council [ 9] is from the new estates;

f] there has been more involvement in the Village Gardening Club but of the 86 Members 10 are from the estates, which is still a low proportion. At the Gardening Club meeting on 13 January 2022 of the 43 there, only 2 were known new residents and 2 not known.

g] the village has an investment club with 15 members and none from the estates despite advertising for new members in the village newsletter.

h] the local cricket club and the local skittles clubs have no one from the new estates participating;

i] there was a churchyard clearance on 2 April 2022, where a general invitation to help was put out, 18 villagers helped but no one from the new estates;

j] there was an outside carol concert for the village on 22 December 2021 with 70ish attending but only 2 from the estates

k] the village organised a Jubilee celebration on Sunday 5 June 2022 which was a huge success with possibly 200 people there including new residents but on Saturday 4 June of about 30 villagers involved in preparation at the Playing Field only one was from the estates.

Considerable effort has been made to include the new villagers in village events and activities. The monthly newsletter is full of information about clubs and events. Some limited progress has been made in allotment membership and gardening club but overall integration has either not happened or proceeded at a slow pace. Better integration may happen but, on the basis of experience to date, it will be a long time coming.

Now throw into that mix the fact that 28 new homes have already been approved on Appeal [ say 70 to 85 more new residents] the same issues will materialise with a new group before integration has improved with the first estates. The prospect on top of that of a further 55 houses in this development with 130 to 165 more people is difficult to countenance without destroying the whole fabric of a community.

The Parish Council's assertion from experience is that people coming into the village in new estates on the fringe of the existing settlement will not promote healthy integrated communities. New residents are typically larger family units consisting of working parents who commute to work by car. They have often not moved from far away retaining family, friends and school connections elsewhere. They will get to know their immediate neighbours on the estate but see little need to get involved in village activities. Equally there is no natural reason for villagers from the old settlement to walk down into the new estates.

Increasingly the village is becoming an older centre surrounded by new housing estates, three already and now potentially four, whose outlook is directed either within their development or outside the settlement.

The contrast with those who have moved to the village recently but to houses in the older settlement is stark. Obviously not all get involved in community life but many do, having formed friendships with those who live in their road/area. The current Chair of The Parish Council is such a person.

The Planning Statement says very little about Social Cohesion but does make the point about the lane going into the village forming a conduit for better integration. This may be a marginal benefit but marginal and likely to be significantly outweighed by the more significant association within the estate and life outside the village.

In previous applications the view has been put forward that integration will happen eventually and it does not matter if this takes a long time. Also, that local activities are not harmed by new development i.e., the activities continue albeit supported by those from the original settlement.

However, this is not promoting the aims of the NPPF. It is not supporting a strong, healthy and vibrant community and it is not promoting social interaction. It is also at risk of creating

two separate communities punctuated by saying hello on the street but not much beyond that.

The best way to remedy that is to accept that it takes considerable time for connectivity to improve and the worst possible thing would be to build another large estate on the fringe of the village.

## 9 Ecology and Biodiversity

Policy NAT 1 of the Tewkesbury Local Plan seeks to conserve, restore and enhance biodiversity.

It is acknowledged that a certain amount of ecological assessment and appraisal work has been done to support the Development proposals. However, the Parish Council believes they fall well short of what is required before a determination is made.

In respect of Great Crested Newts – the Parish Council has asked that the recorded sighting of a Great Crested Newt about 800 metres from the site be considered by the County Ecologist in her evaluation.

In respect of bats – the local area is very well used by bats. It is noted that the bungalow which is due to be demolished in order to provide access to the site has not been assessed for potential bat roosts – nor have any internal inspections or emergence /re-entry surveys been undertaken, albeit the Ecology report acknowledges this is to be undertaken in due course.

In line with Natural England’s standing advice on the matter – it is understood that this work must be undertaken prior to the determination of a planning application. Indeed, in relation to bats further surveys are important as paragraph 3.26 of the Ecology Appraisal says “Based on the findings of surveys, the foraging/commuting bat assemblage is considered to be valuable at District level.”

Indeed, it is noted that the Planning Ecology Advisor requires further survey work to be undertaken and asks why a wider for GCN is not undertaken. We concur given one has recently been found within 800m of the site and the Ecologist considers the site and surrounding area IS a suitable habitat for GCN.

As such the Parish Council raises a holding objection to the proposals on ecological grounds until this work is undertaken to the satisfaction of the County Ecologist.

The Council also notes that otter and water vole surveys will be undertaken and that there are local records of both mammals. Once again, a holding objection must be raised on ecology issues until the County Ecologist is satisfied there is no harm and in fact biodiversity gain, as a result of the development.

As such we consider there remains a Policy SD9 objection to the proposals regards the potential impact upon ecologically important protected species.

## 8 Transport and Sustainability

Para 105 of the NPPF states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, improve air quality and public health. It is acknowledged that opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision making.

Whilst it is acknowledged that Alderton is identified as a Serviced Village in the JCS Table SP2C. This came as a result of an assessment of services and facilities available within the village as at 2015.

However, Policy SP2 (5) acknowledges “that rural village centres will accommodate lower levels of development be allocated through the Tewkesbury Borough Plan and Neighbourhood Plans, proportionate to their size and function, and also reflecting their proximity and accessibility to Cheltenham and Gloucester and taking into account the environmental, economic and social impacts including existing levels of growth over the Plan period. And over the plan period to 2031:

ii) The rural service villages shall accommodate in the order of 880 new homes

We know already:

significantly more than 880 homes have been approved in serviced villages already – with another ten years to go to Plan end

Alderton does not have any allocations either in the new TBP or the ANDP – given the level of development which has already taken place within the village

Alderton is one of the least accessible and distant villages from Cheltenham and Gloucestershire

The level of services and facilities available within the village have significantly reduced since its identification as a Serviced village in 2015 – see below

A significant proportion of CO2 emissions in the county are directly related to transport and as such sustainable development should be in sustainable locations where there is a genuine choice of transport modes.

Despite an attempt by the Applicants Transport consultants to prove otherwise – through a so-called draft ‘Travel Plan’ there is no genuine choice of transport modes.

There is no additional transport/connectivity related infrastructure associated with this proposal therefore, beyond ‘encouraging’, no action is being taken in relation to NPPF from a transport point of view.

The range of facilities now available in the village will only have a minimal impact on car use. Yes, walking & cycling will be a viable option within the village, there are walking opportunities



beyond the village but no green common spaces. Let's have a closer look as some of these so-called facilities/amenities.

#### School:

In spite of two recent village housing developments, the planned pupil number for the new school year is the lowest ever recorded and represents a 60% fall from the previous high. In view of the low numbers and being a split base, the decision has been taken to temporarily close the infant base in Dumbleton with doubt that it will reopen. There will be just 1 child from the village starting school in the Autumn. Why? Because there are no pre & post school day activities which other schools can and do offer, and of course these are a major factor when making a choice of school. There is no reason to suggest therefore that further development will change the decline significantly. Families with primary age children have a choice of schools and tend to leave their children in their current school if moving locally. This means the majority of children need to be transported by car to their chosen school impacting upon traffic levels.

#### Playing field area:

Villagers visit this area to use the children's playground and dog walkers use it for Canine exercise.

However, with regard to its use as a (football) playing field and although we currently have an Alderton football team, the vast majority of players come from outside the village. Given the very restricted parking facility, parking is a real problem particularly for residents living close by. The road narrows at this point exacerbating this acute issue. The traffic impact of this facility is therefore negative not positive.

#### Shop/post office:

Although having a shop in the village earns points under the 'service village' assessment process, the size of the facility is not taken into account. This is a small facility (reduced from its original size) without a store room or wc facilities and therefore can only stock a limited number of items. Following Covid Pandemic and the age of the shop keeper – the premises is now only open in the morning. Whilst regarded as a valuable facility to some in the village, unfortunately the positive impact of the new developments appears to be minimal in terms of turnover. The current owner is over retirement age and finding an eventual successor is forecast to be very challenging indeed. It must be concluded therefore that the traffic reduction impact associated with this facility will be negligible for this proposed development. Due to its limited size and restrictions, the shop does not replace the weekly shop pattern for families to whom this development is directed, which either takes place online – with increased van deliveries to the village – or is undertaken after work or at weekends when the parents – who nowadays must work to pay the mortgage – are free from their employment. So increased rather than less car journeys.

#### Gardeners' Arms Public house.

With many village & rural pubs having closed and more closing every week (nearby Teddington Hands pub closed most recently) In order to survive, it is imperative to promote and attract custom from outside the village. The Gardeners Arms has been successful at this-hence its survival. As welcome as this is, it does attract additional traffic into the village.

Nearest Medical Centre (Winchcombe)

‘Continued pressure within the surgery’

Extract from recent article in the Winchcombe Shopper:

We have recently assessed the work being done at the medical centre. We now have just under 7,900 patients registered with us. In May there were 4,810 appointments with our local clinical team. 7 in 10 of these appointments face to face. This is above the national and regional average.

This does not sound like a service which has much (if any) capacity left for additional patients, if so, then new residents will need to travel by car further afield to seek medical services.

The Travel Plan suggests cycling is a viable option. It is not. Whilst there are several settlements within a 5km radius - Distance is not the issue, the lack of dedicated cycle routes is. As you leave the village you are immediately confronted with busy roads with 50 or 60 MPH speed limits, some of which are in poor condition with degraded and potholed road surfaces. The experience would be poor therefore and judged by many as unsafe and thus not considered seriously as a cycling option. Most of the cyclists seen in the village are cycling through as part of a longer ride and do not live in the village. These tend to be adult, males with sufficient confidence to incorporate the use of surrounding main roads.

There are no dedicated cycle routes in or around the village. Cycling outside the village would mean negotiating the busy A46 trunk road or the increasingly busy B4077. This is not a real option for family cycling and would not be an attractive alternative for commuters with employment elsewhere nearby. The national cycle route referred to (National Cycle Network (NCN) Route 41) is not yet complete, will not be exclusive to cyclists for its entirety and does not include the Ashchurch Railway Station.

Cycling beyond the village cannot therefore be considered to be a pleasurable and safe compared to alternative transport means. Cycling is not an alternative to the car.

The Travel Plan suggests the site is close to bus routes. This is not a viable option. -

The bus timetables listed in the Transport Plan 2 Doc are out of date and cannot therefore be relied upon for accuracy.

606 (Cheltenham)

There are 3 departures from Alderton (recently reduced from 4) T-S with 3 return opportunities M-S. No Sunday services

Earliest out will be 07.24 and latest return 18.00 offering a max possible time period of 9 hrs 24mins.

630 (Tewkesbury)

This is a bookable service only so journeys would need to be pre-planned

656 (Bishop's Cleeve – Tesco)

1 departure out and 1 return departure offering maximum dwell period of less than 1hr 30 mins. Only enough time for a short visit to supermarket.

No options for employment, education, shopping for a limited period and very limited for leisure/theatre.

608 (Cheltenham)

1 departure out and 1 return with a dwell period of 2 hrs 15 mins. This is a Thursdays only service with a limited dwell time.

School buses run during term time only and are generally not convenient for non-school passengers, the Pates School service is a mini bus only and would not have capacity for non-school service users.

In spite of the 2 recent developments and with a 3<sup>rd</sup> under construction there are no plans to improve bus connectivity and non-referred to in any of the planning statements. In fact, the nos. of bus services have declined and journey times have increased despite increased numbers in the village. It just is not a viable alternative.

With the possible exception of the 606 service albeit at over an hour's journey compared to 30 mins by car, the services provided could only be considered for leisure purposes with departure and return opportunities not being convenient for commuter travel and no connection to the nearest network rail station (Ashchurch) By no stretch of the imagination can the services be considered to be Frequent it would be better described as occasional and in decline and at best, provides only a very limited alternative to a private vehicle.

The way to encourage increased bus use would be to provide a more reliable and comprehensive service which of course is not planned. Recent developments have had no impact on increased bus use and there is no reason to suspect that this proposal would be any more effective.

Given the DfT recent decision not to fund Gloucestershire's BSIP (bus service improvement plan), it must be concluded that bus connectivity between the village and surrounding area will not be improved anytime soon and may even decline. – see below:

ITU Public Transport and School Transport

In March Cabinet noted the council's draft Enhanced Partnership agreement which forms the basis for the Bus Service Improvement Plan (BSIP). Following a disappointing decision by the DfT not to fund Gloucestershire's BSIP investment plan (and to fund only 30% of BSIP bids) the cabinet member has written to the DfT to reiterate the council's commitment to public transport and requesting constructive feedback on our BSIP submission.

The council has received DfT funding for a three-year officer post.

The DfT decision and timing, six months before the DfT is due to end Bus Recovery Grant, are expected to destabilise commercial and subsidised bus services in the county. These were already badly weakened by the financial impact of Covid on passenger levels (down 30%), fuel prices at record levels and driver wage growth. In the short-term officers have identified options to help reassure operators, using an underspend in concessionary fare support to provide an inflationary contract price uplift, to maintain concessionary fares reimbursement and to avoid the withdrawal of the Arle Court Park & Ride.

However, this is unlikely to be of sufficient scale and duration to address longer term structural challenges so we must prepare for more early contract terminations by bus operators, sharp rises in tender prices and reductions to popular commercial services which have previously been resilient. Whilst some mitigation could be achieved by increasing GCC funding through the MTFS process service reductions will reduce the county's economic attractiveness to investors and limit progress with reducing transport carbon emissions (source GCC report)

Once again Public Transport is not a viable option.

The Travel Plan suggests Rail journeys are an option. Ashchurch Station is 9KM away – only accessible by car or by a confident cyclist. The route for a cyclist is nonsensical given the main lorry filled route of the A46.

A number of local residents have similarly responded to the nonsensical nature of the Travel Plan proposals – which will not result in any form of meaningful modal shift from the only transport mode available to access school, employment, shopping and leisure facilities, namely the private motor car. The Parish Council wholeheartedly supports their comments which reflect our similar findings.

In Terms of Sections 6, 7 & 8 of the Travel Plan – relating to managing, targets and measures of the Travel Plan - Sustainable and Sustainability are words thrown around in these documents like confetti at a wedding. The more these words are used does not prove the case.

The piece of good agricultural land which would be lost is sustainable at the moment. Trees and grass have a cooling effect caused by shading and transpiration, when water within the tree is released as water vapour through their leaves, hard surfaces on the other hand are much hotter than areas of vegetation. Destroying vegetation changes how the land absorbs and releases energy contributing to temperature rises. Between 30 and 40 % of carbon pollution in Gloucestershire is emitted by transport. Building more dwellings in a remote village will only add to this. Priority must surely be given to developments which rely on achievable sustainable transport alternatives. In spite of all the vague targets and abstract intentions outlined in section 6,7 and 8, because of this site's remoteness and with no real alternatives, private vehicle use will continue to be the first and only choice. The main access along St Margaret's Drive will turn this narrow quasi cul-de-sac into a throughfare changing the nature of this drive completely. Indeed, all connecting roads in and around the village can

be classed as narrow, poorly maintained with limited passing places for vehicles larger than a modest car size.



As clearly set out in Objection letter 29a traffic within the village is increasingly problematic and changes the character of this rural village –

I'd like to add one further comment, regarding traffic. When our children were growing up, it was possible to feel very safe on the pavements of the village and the lanes around. You could go out with a small child on a bike or take a walk down Dibden Lane and hardly ever meet a car. In July 2022 if you walk that same route, you will be passed repeatedly by cars on this single-track road. The character and safety of the village have changed dramatically with the housing already allowed in Alderton. The surrounding lanes and access roads are not suitable for a high volume of traffic, nor is the layout of the village itself. Adding more housing will only add to the existing problem.

Significant concerns over traffic and highways aspects of the development and the ludicrous nature of the applicants' arguments that the village is sustainable from a transport perspective are raised repeatedly in many objection letters such as those at Nos. 18a, 64, 57, 75, 40.

The Parish Council therefore concludes that the scheme fails to comply with Policy SO7 (sustainable transport) and SO6(meeting the needs of climate change) – given this development can only been a car reliant development with no viable alternatives despite the unrealistic claims of the suggested Travel Plan.

## 10 Design and Access including Impact on residential amenities

A review of the DAS – which sets out some of the parameters for a future design layout, does not correctly set out the characteristics of built development close to the site. Whilst it is acknowledged that the recently built Cala Homes Estate at Fletcher Close comprises two storey housing, the predominant scale of development currently abutting the site from St Margaret's Drive and Road comprises bungalows, with very few (and only then) modest two storey houses. St Margaret's Drive was built in the 1970's and remained low respecting the setting of the village within a rural landscape and AONB setting. To suggest that a new estate of houses of predominant two storey nature would be in keeping with the character

of the village would be totally out of keeping with the principal character of the village and its setting and location.

As such the scheme fails to comply with Policy RES5 of the TBLP as the scheme does not respect the form of the existing settlement or its landscape setting. This is a clear intrusion into open countryside.

### In terms of impact upon residential amenities -

#### 18 St Margaret's Drive – Bungalow to the left of new access

This bungalow has two windows in their side elevation, directly facing the proposed access road, one serving their living room and the other serving their bathroom. The proposal provides for the new access road to run along the entire boundary of their property. This will cause noise and disturbance from vehicles using the access road where at the moment the occupiers enjoy peace and quiet to these rooms and their rear garden. As such the proposal will be detrimental to the living conditions in their house and enjoyment of their garden

#### 14 St Margaret's Drive – Bungalow to the right of new access

Noise, disturbance and loss of privacy will be suffered by the occupiers from the access road traffic. Causing significant damage to the quiet enjoyment of their property. They have already endured the disturbance caused by the construction of the new estate behind them and to ask them to run through a worse repetition runs counter to everything one could naturally expect from village life.

#### 7 St Margaret's Drive – Bungalow opposite [ other side of St Margaret's Drive].

This property faces directly onto the head of the access road. Thus, the headlights of vehicles exiting the access road will project into their lounge and ground floor bedrooms. This would not be the odd vehicle but upwards of 110 cars owned by new residents plus delivery vehicles. This would cause disturbance, particularly on winter evenings. On the refusal of the planning appeal on land to the west of Willow Bank Road [ APP/G1630/W/15/3003278, para 39 to 41] the Inspector, Jonathon Manning, regarded a similar case concluded such headlight issues would cause unacceptable harm.

The Parish Council concludes a similar unacceptable harm would occur here.

As such the scheme is contrary to Policy RES 5 due to the detrimental harm caused to residential amenities.

## 11 Conclusions

The National Planning Policy Framework (NPPF) provides a framework for the development of locally-prepared plans and the Government's planning policies for England and how these are expected to be applied. Paragraph 7 of the NPPF states that: 'the purpose of the planning system is to contribute to the achievement of sustainable development'. It states that in

order to deliver sustainable development, the planning system must perform three distinct objectives, aligned to the three pillars of sustainability, which must not be taken in isolation and should be pursued jointly.

1 An economic objective to help build 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, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.

Now that TBC has a new Local Plan and an anticipated 5-year housing land supply, this is definitely not the 'right type', in 'right place' & 'right time' This is good agricultural land at the edge of and within the setting of the ANOB and is not designated land in any plan currently in force. It lies outside the village boundary on the edge of a village with minimal facilities and is not sustainable in terms of travel choice except by car.

2 A social objective supporting strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well designed beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

This development will add further to the ongoing destruction of social cohesion and community wellbeing within this once small rural village which has already suffered from excessive house building in recent years. Alderton already has 'a sufficient number and range of homes can be provided to meet the needs of present and future generations. Since 2015 this small rural village has had 105 new homes built – a 38% increase in the size of the village – this 55-unit scheme would increase the size of the village by 58% overall within the last ten years. This cannot be absorbed and fractures within the community are already undermining the historic social cohesion and community spirit within the village which was at the heart of village life.

The social cohesion and community health, social and wellbeing is rapidly being eroded with each new estate of houses being built – rather than the organic growth previously experienced within the village. A healthy vibrant community is being destroyed. The Joint Core Strategy recognises that disproportionate growth at service villages is not desirable. But that it should be proportionate to its size and function. This additional 55-unit scheme takes us even further away from proportionality. This must stop before everything that is loved about the village is destroyed for ever.

3 An environmental objective contributing to protecting and enhancing our natural, built and historic environment; including, making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. These objectives are key to the development of plans and the NPPF sets out a number of key themes for consideration which guide the preparation of local plans and policies, ensuring the delivery of sustainable development.

This scheme destroys a natural environment. Significantly and adversely impacts upon the setting of the AONB and the characteristics of the site's designation as part of the Special Landscape Area.

The scheme impacts upon the character and appearance of the historic core of the village, with its designated and non-designated heritage.

This unsustainable site – with its high dependence on car usage – with poor alternative transport modes, cannot be mitigated or adapted to climate change, but will increase carbon emissions and fail to move towards a low carbon economy.

Alongside the extensive, robust objections Alderton Parish Council sets out in full above, we also fully support the CPRE letter of objection which also sets out in principle reasons why this scheme should be refused. (letter dated 12<sup>th</sup> August 2022). They conclude:-

There is no justification for this development on planning grounds

The proposed development would hamper the achievement of the sustainable transport targets of the JCS strategic objective 7

This large scale development would further harm sensitive local landscapes in an SLA and the setting of the AONB

The addition of so many extra homes to a village already seeking to accommodate major expansion would harm social wellbeing and community cohesion in Alderton.

This is contrary to the promotion of a healthy community in Strategic Objective 9 of the JCS.

We concur with the conclusions of ICPRE alongside our Parish Council objections .

**For all the reasons cited above and, supported by the objection letters of almost 150 villagers, the Parish Council respectfully asks the Borough Council to robustly refuse this application as being completely and utterly against the Development Plan in force.**