

# Alderton Parish Council Proof of Evidence Statement

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Appeal Site: Land East of St Margarets Drive, Alderton

Appeal by: Freeman Homes

Against: Refusal of Outline Planning Permission

Appeal Proposal: Outline planning application for the erection of up to 60 no. dwellings and associated parking; vehicular access from St Margarets Drive; provision of open space; the construction of highways through the site and associated engineering works, including the creation of an attenuation pond. Demolition of 16 St. Margarets Drive.

**PINS Ref: APP/G1630/A/14/2222147**

## **PROOF OF EVIDENCE**



## Introduction

Alderton Parish Council are submitting the following Proof of Evidence not from the Parish Councillors perspective, but representing the views of local people who live in the village. We have the views of the great majority of the village behind us as can be shown in the Alderton Community Survey results in 2013 and more recently in October 2014 results which will inform the Alderton Neighbourhood Development Plan (NDP). Both surveys were well represented with 88% response rate for the Community survey and 75% for the NDP, so we can demonstrate and provide evidence of a strong understanding of the views of 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. The village is visible from a number of key viewpoints such as the adjacent Cotswolds Area of Outstanding Natural Beauty (AONB) and the B4077, a main artery into the Cotswolds. The village is situated in a Special Landscape Area abutting the boundary of the AONB.

It is 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 Local Planning Authority (Tewkesbury Borough Council) refused outline planning permission for land east of St. Margarets Drive for six reasons.

Alderton Parish fully agreed with the Council refusal for outline planning on the six reasons which were:

1. *The proposal, by virtue of its prominent open location to the south of Alderton would represent a significant encroachment into the surrounding rural landscape. This encroachment would have a harmful impact upon the character and appearance of the landscape within a Special Landscape Area which serves to protect the foreground setting of the nearby Area of Outstanding Natural Beauty. Furthermore, the proposed addition of up to 60 dwellings would be of a scale disproportionate to the existing settlement that would fail to maintain or enhance the vitality of Alderton which would have a harmful impact on the social wellbeing of the local community. The proposal therefore does not represent sustainable development within the context of paragraph 14 of the NPPF and the identified harms would significantly and demonstrably outweigh the benefits of the proposal. The proposed development is therefore contrary to the core principles of land-use planning set out at paragraph 17 of the NPPF, sections 6 (Delivering a wide choice of high quality homes), 8 (Promoting healthy communities) and 11 (Conserving and enhancing the natural environment) of the NPPF, policy LND2 of the Tewkesbury Borough Local Plan to 2011 - March 2006 and emerging policies SD2 and SD7 of the Pre-Submission Joint Core Strategy (April 2014).*
  
2. *The application does not provide housing that would be available to households who cannot afford to rent or buy houses available on the existing housing market. As such the proposed development conflicts with Policy HOU13 of the Tewkesbury Borough Local Plan to 2011 - March 2006 and policies SD12 and SD13 of the Pre-Submission Joint Core Strategy (April 2014).*
  
3. *The application does not make adequate provision for on-site or off-site outdoor playing space and playing pitches with changing facilities, to meet the needs of the proposed community. The application therefore conflicts with the section 8 of the NPPF (Promoting healthy communities), and Policy RCN1 of the Tewkesbury Borough Local Plan to 2011 - March 2006 and policies INF5 and INF7 of the Pre-Submission Joint Core Strategy (April 2014).*
  
4. *The application does not make provision for the delivery of secondary education infrastructure and library provision and therefore the proposed development is contrary to Policy GNL11 of the Tewkesbury Borough Local Plan to*

2011 - March 2006 and policies INF5 and INF7 of the Pre-Submission Joint Core Strategy (April 2014).

5. *The application does not make provision for on- and off-site community infrastructure and improved health care facilities and therefore the proposed development is contrary to Policy GNL11 of the Tewkesbury Borough Local Plan to 2012 - March 2006 and policies INF5 and INF7 of the Pre-Submission Joint Core Strategy (April 2014).*

6. *The application does not make provision for highway improvements and therefore conflicts with section 4 of the NPPF (Promoting sustainable transport) and Policy TPT1 of the Tewkesbury Borough Local Plan to 2011 - March 2006 and policies INF1, INF2 and INF7 of the Pre-Submission Joint Core Strategy (April 2014).*

Whilst the issues relating to points 2-6 may well be resolved in certain aspects, the Parish feel that there is some doubt that the unsustainability of the application by Freemans Development creates an adverse impact and significantly and demonstrably outweighs the benefits of a presumption in favour of sustainable development when assessed against the policies of the NPPF Framework.

### **Localism – The voice of the people who live in Alderton**

In the foreword by the Rt Hon Greg Clark MP, Minister of State for Decentralisation

*“A plain English guide to the Localism Act’ November 2011, the act is described as setting out a series of measures with the potential to achieve a substantial and lasting shift in power away from central government and towards local people. They include: new freedoms and flexibilities for local government; new rights and powers for communities and individuals; reform to make the planning system more democratic and more effective, and reform to ensure that decisions about housing are taken locally”.*

In October 2012, Alderton Parish Council was approached by the first of several prospective housing developers interested in submitting planning applications for medium to large scale housing developments within the Parish, notably outside the current agreed settlement boundary.

Within a month of this first approach, Alderton Parish Council had identified that there were two emerging priorities for the Parish and two methods of delivery to

achieve these. At a Parish Meeting held in November 2012, two groups made up of local volunteers were established: The Campaign Group and The Plan Group. The Campaign Group's role has been to focus on the present, concentrating on the preparation of the Parishes' responses to subsequent planning applications, the Plan Group's role has been to plan for the future – focussing on the evolution of the parish over the next twenty years.

### Alderton Plan Group key **Milestones**

- 27 November 2012 established, regular group meetings held
- 25 January 2013 Alderton Plan Group open meeting attended by over 65 residents
- 26/27 January 2013 approximately 200 residents visited the Alderton Plan Group exhibition in the Village Hall
- February 2013 distribution of Alderton Plan Group questionnaire to seek views from local residents and support the development of the Design Statement – 88% of residents responded to the survey
- 18/19 May 2013 Design Statement consultation in the Village Hall
- May – Sept. 2013 Plan Group prepare Design Statement with the support of Gloucestershire Rural Community Council and Tewkesbury Borough Council
- October 2013 Design Statement endorsed by Alderton Parish Council
- October 2013 Alderton Parish Council decides to produce a Neighbourhood Plan for Alderton Parish, TBC supports the application
- October 2013 The Alderton Plan Group becomes the Alderton Neighbourhood Plan Group (ANDP)

Alderton believes that any plan needs to be viable and community-led

The purpose of the ANDP is to look to the future and to enable the Parish to evolve in a way that local residents want to see.

We want to take advantage of our rights, as set out in the Localism Act, encouraging communities to harness their distinctive local awareness and skills and utilise these in a powerful way to shape development, giving local people a direct role in shaping their local planning policies.

We know that the national NDP guidance requires us to follow a set procedure, which includes significant levels of consultation with local residents, ultimately

seeking consensus on a final NDP, which when ‘made’ will become a legal document. We welcome this. The ANDP Group has consistently and actively sought a mandate to proceed with all priorities, objectives and proposals and will continue to do so.

The ANDP Group spent the first year researching what an NDP is, identifying what **Proposals** we want to focus on in our NDP (the content of our NDP will cover the following areas: Housing and Development, Local Character, Important Local Views and Important Local Green Spaces, Environment and Biodiversity and Community Safety and Facilities) and the **Vision** and **Objectives**, which, supported by our own policies will ensure delivery. We had an excellent Design Statement to build upon, which was informed by the 2013 Alderton Community Consultation responses. Section 4 of the 2013 Consultation Outcome Report provides the rationale behind this choice of headings and the 2014 Alderton Design Statement for landscape character and other salient information about the Parish and also results of the public consultations on design elements.

In engaging with the local community, the ANDP Group, with the support of GRCC through a grant from Locality, designed a ‘sense check’ household survey.

In October 2014, the ANDP Group distributed the second ‘**Alderton Matters**’ survey to local residents, 75% of whom completed and returned the questionnaire. The ANDP Group completed the analysis of the survey responses and presented the findings to a Parish Meeting on 13 November 2014.

The ANDP Group, and the Parish Council, believe that a 75% response rate from residents in the NDP Area has provided the Alderton NDP Group with a strong mandate to proceed to the next stage of developing the NDP – Writing the Plan and its associated Policies.

The summarised results of this survey from October 2014 are:

**Our Vision:** *endorsed by 84% of respondents in the October 2014 Parish NDP Survey*

*‘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.’*

We wish to see:

- A continuing choice of high-quality housing of an appropriate type, style and ownership and in proportionate numbers to the size of the Parish settlements.
- Current and future generations enjoying the special built and landscape character of the Parish and connecting with nature.

- Facilities, services and community spaces suitable for all ages, enhancing community cohesion, communications and overall health and wellbeing.

### **Our Objectives:**

Alderton NDP Objectives: *over 86% agreement in the October 2014 Parish NDP Survey*

- 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

**Housing and Development proposals for the NDP:** *over 82% agreement in the October 2014 Parish NDP Survey*

- 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

**Specific relevant survey results under the heading Housing and Development relating to the scale of development:**

- 51% preferred ‘a larger number of small developments’
- Maximum number of homes in any single development in Alderton Village settlement:
  - 27% - 10, 17% - 20, 16% - 5, 10% - 8

**Local character proposals for the NDP (including Important Local Views and Important Local Green Spaces):** *over 79% agreement in the October 2014 Parish NDP Survey*

- Any development to seek actively to conserve and enhance the distinctive character of Alderton Parish
- Design features on buildings to be rural rather than suburban in character in line with the Alderton Design Statement
- Development to reflect local characteristic building styles and materials
- New buildings to be no more than two storeys high
- A variety of designs in any new development as is typical of the built form of the Parish (i.e. avoid uniform development)
- Protection of the character and setting of listed properties
- Restoration of lost landscape features
- Avoid light pollution– no street lighting
- Avoid light pollution- window size and design in new buildings and extensions should not create undue artificial light
- Important landscape features e.g. hedgerows, trees, brooks, ponds, should be conserved
- Development located in places that creates least harm to the special landscape character, outstanding natural beauty and biodiversity of the Parish
- Preservation of key views\* to and from the AONB so that special landscape features can be enjoyed by future generations

\*Out of the 235 sets of questionnaires and appendices received, 210 households responded to questions relating to ‘Views’. Households were asked to indicate from a list of views, either within or from Alderton Village, those which were particularly important to them. The list was generated from consultation responses to the Alderton Design Statement and following a landscape character assessment carried out in 2013.

View G. From the B4077 to the southern flank of the village with attractive grouping of houses around church from the Winchcombe Way LDP, in particular views of church and Grade 2 listed cottages from field south of Church Road – received 71%



(149 individual responses) of respondents identifying View G as a Key View of particular importance. This was the highest scoring 'view' of the twelve listed (A – L) in the survey questionnaire.

**Environment and Biodiversity proposals for the NDP:** *over 85% agreement in the October 2014 Parish NDP Survey*

- Wildlife corridors to be created in new developments
- Scale of any proposed development to take account of key wildlife habitats and special areas of conservation / SSSIs in the Parish
- Remains of old orchards to be protected and orchards reinstated
- Planning applications to contain a full analysis of the impact of both pluvial (rain) and fluvial (river) flooding:
  - on the development and
  - on other locations/ properties
- Minimise surface water run-off from hard surfaces (ie Permeable surfaces for drives and car parking spaces)
- Sustainable construction that meets or exceeds government targets for a zero-carbon future
- High standards of developer/construction company and community relations:
  - construction noise to be kept to a minimum to minimise disruption to neighbours
  - air quality to be monitored by contractors during the construction period, reported and appropriate action taken

**Community Safety and Facilities proposals for NDP:** *over 76% agreement in the October 2015 Parish NDP Survey*

- Parking spaces Unobtrusive car parking should be available in new developments for at least two cars per dwelling, plus additional occasional car parking spaces for visitors and deliveries.
- Visual impact of car parking spaces to be minimised by trees, shrubs, wooden gates and other features
- Creation of new footpaths between the Alderton settlements
- Link parish settlements with the wider cycle route network
- Preserve the rural character of footpaths and lanes in the parish
- Impact on traffic flow and movement to be considered as part of any business development planning application
- Impact on traffic flow and movement to be considered as part of the planning application of any development of over homes
- Design of layout of new development not to impede safety
- Design, layout and location of new development not to impede access by emergency vehicles

- Urbanising features (e.g. speed bumps, excessive road signage, paved over verges) to be kept to the minimum necessary for road safety in order to preserve the rural character of the Parish

Respondents to the survey were also invited to describe what 'community cohesion' meant to them. If you enter the phrase 'community cohesion' into an internet search engine you will find a range of definitions. However, we believe that the only true definition of this phrase is the one defined by the community it pertains to. Here is a selection of definitions provided by residents of Alderton Parish within their responses to the October 2014 Parish NDP Survey:

*The community has an identity - that people feel they 'belong', that everyone pulls together. NOT an anonymous collection of people who don't know each other and who just 'happen' to live there"*

*Sticking together with a common sense of purpose*

*A community speaking with one voice*

*A community working together, supporting each other, participating in community events are upholding everything that has made the place special*

*A good community spirit, a sense of belonging, where people live and work in harmony*

*Residents care for each other and involve themselves in and support village institutions such as the church, school and local businesses*

*Residents feel part of a supportive community, and consequently care about fellow residents, the local environment and the success of businesses and amenities within the community*

*Developing and maintaining a sense of identity and pride in the environment and community. This means managing growth in housing and facilities and the way that changes are made so as to be in keeping with the needs of the village and the views of its residents*

*All villagers working together and living in harmony, thus creating a village which is a joy to live in for all generations*

*It means all villagers joining in together without creating "them and us"*

## **Service Village Forum**

The Service Village Forum's membership is made up of Parish Council representatives of the twelve settlements identified as Service Villages in the emerging Joint Core Strategy. The forum is regularly attended by officers of

Tewkesbury Borough Council and an elected Borough Councillor at the invitation of the members. The Forum’s aims include the representation of the Service Villages and the support of those making formal development plans in our geographical area. The Service Village Forum is supported by the Gloucestershire Rural Community Council. It is a collaborative project addressing, in a tangible way, the ideals described by Government such as “Community Led Planning” and “the Big Society.”

The stated objectives of the forum are:

<p>1. Knowledge</p> <p>a. Keep each other up to date with each Service Village’s situation and actions.</p>
<p>2. Representation</p> <p>a. Give stronger messages to the Borough</p> <p>b. Give stronger messages to Joint Core Strategy</p>
<p>3. Neighbourhood Development Plans</p> <p>a. Share knowledge</p> <p>b. Share resources</p>
<p>4. Housing allocation</p> <p>a. Work together to identify an appropriate number of houses required in the Service Villages over the JCS period of 2011 to 2031</p> <p>b. Work together to allocate the identified number of houses within the Service Villages</p>
<p>5. Project Life</p> <p>a. Project to run until Joint Core Strategy is ratified.</p>

The Service Village Forum seeks to support those preparing formal plans. The formal plans fall into three categories being;

- The Joint Core Strategy
- Tewkesbury Borough Council Local Plan
- Neighbourhood Development Plans

### **The Joint Core Strategy (JCS)**

The JCS was prepared by Cheltenham, Gloucester and Tewkesbury Councils supported by Gloucestershire County Council. The Joint Core Strategy (JCS) is a key part of the development plan for the area. It is an important document because

it sets out the identified need and location for housing and employment, and supporting infrastructure, in our areas up to 2031. The planning system is 'plan-led' – this means that development proposals have to be in accordance with the policies and proposals of the development plan unless there are good planning reasons to set them aside. Without a Joint Core Strategy, therefore, we significantly increase the risk of being unable to prevent or control unplanned development.

The JCS was submitted to the Secretary of State in November 2014 and Spring 2015 sees the examination period.

Distribution of development is described in Policy SP2.

#### **Policy SP2: Distribution of New Development - Part 2**

Over the plan period to 2031, land will be provided for about 31,040 new homes and for about 64 hectares of employment land, to support about 28,000 new jobs.

- Gloucester and its urban extensions will accommodate about 11,820 new homes
- Cheltenham and its urban extensions will accommodate about 10,655 new homes
- Elsewhere within Tewkesbury Borough development will accommodate about 8,565 new homes. This will be met:
  - through strategic allocations at Ashchurch
  - through smaller scale development meeting local needs at
    - Tewkesbury town in accordance with its role as a market town,
    - and at rural service centres
    - and service villages.

#### **Policy SP2: Distribution of New Development - Part 4**

Rural service centres and service villages as identified in Table SP2c below will accommodate lower levels of development to be allocated through the Tewkesbury Borough Plan and Neighbourhood Plans, proportional 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. Over the plan period to 2031:

- The rural service centres will accommodate 1860 new homes, and
- The service villages will accommodate 752 new homes

## Tewkesbury Borough Council Local Plan

The Service Village Forum has participated in four key stages of the development of Tewkesbury Borough Council's Local Plan. The overall aspiration is to assist Tewkesbury Borough Council to prepare a plan which can be supported by each of the twelve Service Villages and is consistent with NDP's as they are produced, and is consistent with the JCS.

<b>Disaggregation</b>	<b>Qualitative Assessment</b>	<b>Site allocations</b>	<b>Influence &amp; Support TBC Local Plan</b>
<p>Evidence based allocation of 752 houses around the 12 Service Villages in accordance with the principles described in the NPPF and JCS being</p> <ul style="list-style-type: none"> <li>• Size</li> <li>• Function</li> <li>• Proximity &amp; Accessibility to Cheltenham and Gloucester</li> </ul>	<p>Examination of deliverability of the disaggregation allocations and identification of constraints to development.</p>	<p>Facilitate dialogue between Tewkesbury Borough Council and individual Service Villages in the identification of sites capable of delivering 752 houses in the period to 2031.</p>	<p>Offer pre-publication opinion and feedback concerning the content and presentation of Tewkesbury Borough Council's Local Plan.</p>

At the time of writing, these processes are nearing an end and it is hoped that TBC's first draft for public consultation will be published in February 2015. Work continues to fine tune the disaggregation calculations but the principles and bulk of the core data is complete. Taking core data Alderton is currently ranked as follows against each of the sub-headed categories.

Size – 7<sup>th</sup> out of 12

Function – 5<sup>th</sup> out of 12

Proximity – 10<sup>th</sup> out of 12

The weighting of each of the three sub-headed categories is still being debated but at the extremes of the spectrum, the allocation for Alderton is in the ranges between 40 and 48 for the period from 2011 to 2031.

### **Aldertons Transport Concerns**

The National Planning Policy Framework (NPPF) 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. Alderton's remote location means it is necessary to have an independent means of transport for work, leisure, health and many other forms of activity in the local area.

This is evidenced by the 2013 Alderton Parish Consultation Outcomes Report and is reinforced by the lack of a regular and frequent Public Transport Service. Although retired residents are supported by current bus services, services are very limited as evidenced by the Bus Timetables. The NPPF requirement is to build in places where it is possible to engage in cycling, walking and taking the bus to work and our concern is that this is not being met.

Thus the very nature of Alderton's location makes car ownership a necessity, but by the same token its residents actively choose to live there because of its relative separation from larger settlements.

All access routes in and out of the village are in the main single track roads. The new agreed development proposes parking for 103 cars. This development will add a further 130+ vehicles. This will significantly impact on the traffic flow through roads within the village which are narrow, along which many houses have no off-street parking, and the roads are generally restricted by parked cars.

However it is not just the impact on roads within the village that needs to be taken into consideration but also the knock on effect on the main roads outside the village such as the B4077, and the A46, coupled with the effect of other new developments within the area such as at Winchcombe our nearest small town. Both these aspects raise the question of Road Safety, particularly as the B4077 has been the scene of 2 fatal accidents in the last 12- 24 months.

In summary, the proposed new development will merely seek to increase the necessity for car travel and will have an impact on village roads that are ill-suited to cope with such an increase, particularly at the main access and egress points. This completely contradicts the sustainability principle of the NPPF.

### **Aldertons Employment Concerns**

Employment is key when determining if development is sustainable. Housing should be located where people can walk, cycle or use public transport to travel to work.

75% of Alderton residents commute to work, compared with 68.5% in Tewkesbury Borough and 57% in England.<sup>1</sup> This percentage would increase with the approved 47 additional households. This is contrary to NPPF intentions. Universal Jobmatch produces no current vacancies within a 5 mile radius, the nearest jobs are located in Tewkesbury, 8 miles distant, Cheltenham 12 miles and Gloucester 20 miles. NPPF states development should be planned to minimize journeys to employment, additional houses in Alderton conflicts with this, residents typically commute.

Many employment opportunities in Gloucestershire, full-time and part-time, require employees to be flexible and prepared to work evenings or weekend shifts. Large scale recruitment in the past six months has been predominantly in retail, hospitality and care sectors. These predominantly part-time jobs were not accessible to Alderton residents by public transport. Financial service sector is also increasingly employing staff on shifts including Capita, Endsleigh and LloydsTSB. Slow broadband speeds adversely impact upon home working.

Barriers created by lack of access to public transport to reach employment are exacerbated for young people; many cannot drive or afford to buy and run vehicles. Youth unemployment in Tewkesbury has only reduced by 3.8% between January 2013 and January 2014. In contrast, Gloucestershire's youth unemployment has reduced by 26%. Youth Contract is a government scheme introduced to help tackle this issue. Sector based work academies, part of the government's Youth Contract, offer training and work experience. Full-time attendance is required, but bus services are too infrequent to enable Alderton people to attend these in Gloucester, Cheltenham or Tewkesbury. Tewkesbury Local Authority also has the highest proportion of young people (4.9%) not in Education, Employment or Training in Gloucestershire. <sup>2</sup>

There is no strategic policy to deliver new jobs near Alderton. The proposal is not for sustainable development, making it easier for jobs to be created, increase prosperity or improving quality of people's lives. Neither is it a rural exception site to accommodate current residents with existing employment connections.

NPPF directs that Local Authority strategy for housing and employment is integrated; allowing property developers to determine housing locations does not permit this required integration.

## **Aldertons Housing Concerns**

A key argument for this development is that Tewkesbury Borough Council cannot demonstrate a 5 year land supply and that puts them in breach of their statutory requirement. The question becomes to whom is there material harm because of this

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<sup>1</sup> National Office of Statistics

<sup>2</sup> Gloucestershire County Council January 2014

breach? Primarily the local residents themselves with quality of life issues, then the building industry as a stakeholder in the planning system and then those people who are unable to house themselves.

In Tewkesbury Borough Councils local plan (3), the Council recognised the difficulty faced by families living on low incomes in rural areas. They proposed sites should be small in size, located in or adjoining villages and where there were adequate local facilities. This proposed development provides 35% of affordable housing which significantly exceeds local requirements within Alderton. The approved development of 47 houses and the 15 affordable homes this contains exceeded our own survey of affordable housing needs in 2010 (4).

By solving the issue of a lack of land supply we are creating another; building houses for those in need of housing is important, but just as important is building houses where people can sustain themselves through the local services and infrastructure. Making up the required numbers in a sustainable location has to be a preferred solution than the decision to build affordable houses in unsustainable locations.

### **Local Schooling**

The Governing Body has considered this planning proposal and, on their behalf, I would comment also as follows:

1. Numbers on Roll (NOR) – the facts at the moment are that we have 105 total places and 86 NOR so spare capacity of 19. There are 10.75 children forecast from the approved development at Beckford Road which we still think is too low. We do not understand how we can be predicted a possible fall in roll in the next few years whereas in fact The National Pupil Projection Numbers forecast a rise in school population between 2015 and 2020 of 9%. Should this occur then Oak Hill could not cope with the increase in it's population that the new proposed development East of St Margaret's Drive would create.

Presently, in some year groups we are full i.e. 15 or more in a year group. The projected increase in pupil numbers cannot forecast the year group these children will fall into and whilst in some cases it may prove beneficial to the school, it may also be detrimental in presenting unmanageable problems in maintaining equilibrium in class sizes and teaching groups. No doubt the latter would cause uproar from parents.

2. We have no capacity to extend our existing school buildings, either in Dumbleton or Alderton (remember that infants are in Dumbleton and Juniors in Alderton). Accordingly, extra monies are of no use unless they are sufficient to sustain a manageable and quality education and enable school buildings to be

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<sup>3</sup> Tewkesbury Borough Local Plan to 2011 - Affordable Housing Policy HOU14.

<sup>4</sup> Alderton Parish Housing Needs Survey April 2010



rebuilt/relocated which is very clearly not desirable as the threat would be to build a new school and the likelihood is that Dumbleton and/or Alderton would lose its school and the character and history of our rural faith school would be lost forever.

3. Furthermore, the prospect of section 106 monies may be seen as a “fix all” solution, whereby “**one off**” finance is made available as a means of solving the problem. However, the two sites of Oak Hill School do not lend themselves to material development in a temporary or permanent form. Space is extremely limited and would deny pupils active recreation space for out of class activities and breaks.

The s106 monies offered may well pay for additional staffing but there is no capacity to enable separate classes to be taught, particularly at Dumbleton. It is highly unlikely the school funding formula for subsequent years would sustain the subsequent financial shortfall. In short, the s106 money would be a "quick fix".

Accordingly, and as mentioned previously, development on the scale planned is a real threat to the school as it could not accommodate all the forecast children. We would be averse to a sudden influx of pupils that may serve to disrupt the efficient means of management already in place, detracting from the environment which presently makes parents feel their children are part of a caring and unique school.

## **The Visual Impact.**

Local Planning Authorities reason for refusal

*The proposal, by virtue of its prominent open location to the south of Alderton would represent a significant encroachment into the surrounding rural landscape. This encroachment would have a harmful impact upon the character and appearance of the landscape within a Special Landscape Area which serves to protect the foreground setting of the nearby Area of Outstanding Natural Beauty. Furthermore, the proposed addition of up to 60 dwellings would be of a scale disproportionate to the existing settlement that would fail to maintain or enhance the vitality of Alderton which would have a harmful impact on the social wellbeing of the local community. The proposal therefore does not represent sustainable development within the context of paragraph 14 of the NPPF and the identified harms would significantly and demonstrably outweigh the benefits of the proposal. The proposed development is therefore contrary to the core principles of land-use planning set out at paragraph 17 of the NPPF, sections 6 (Delivering a wide choice of high quality homes), 8 (Promoting healthy communities) and 11 (Conserving and enhancing the natural environment) of the NPPF, policy LND2 of the Tewkesbury Borough Local Plan to 2011 - March 2006 and emerging policies SD2 and SD7 of the Pre-Submission Joint Core Strategy (April 2014).*

Alderton parish are concerned about the visual impact this development will have on the Alderton rural landscape. For a number of reasons:

1. The huge visual impact this proposed development would have on the beautiful, charming village of Alderton.
2. The opinion of the majority of the residents of the village in a recent survey stating that 84% wish “to protect and enhance the special landscape of Alderton Parish, its extensive open views, natural beauty and biodiversity.” The view that was most important to the locals according to the survey is that from the B4077 to the southern flank of the village with attractive grouping of houses around the Church, which includes listed thatched cottages.
3. Description of this view. The fact that the B4077 is the gateway to the Cotswolds and was a Turnpike from 1726 to 1872. Thus travellers have enjoyed the view of the ancient Church for many centuries .The view would be completely obliterated by the proposed development. Alderton, would therefore, lose its landmarks and as a result its identity.
4. The above survey also stated that villagers also treasured the view from Church Road towards The Great Western Railway line with it’s steam engine nestled in the valley below Langley Hill.
5. The disproportionate scale of this development and high-density housing will definitely impact on the visual character of the village and will look like a housing estate bolted on to an historical village. It would have a negative impact.

### **Tewkesbury Borough Landscape and Visual Sensitivity Study**

Tewkesbury Borough Council commissioned Toby Jones Associates Ltd in September 2014 to evaluate all land surrounding rural service centres and service villages as identified in the Joint Core Strategy in terms of landscape and visual sensitivity to residential development.

This study identifies issues and sensitivities that should be taken in to account when considering new development around the Rural Service Centres and Service Villages. Whilst the primary focus is that of residential development, the findings can equally inform decisions about other types of development.

This report forms part of a wider evidence base that will ultimately inform the identification of the most suitable sites for new development through the Tewkesbury Borough Plan. This report provides an evaluation of landscape and visual sensitivity; it does not seek to make a definitive judgement on the suitability of sites for development.

A package of studies and considerations, including infrastructure capacity, ecology, townscape sensitivity, heritage, flood risk and other detail site constraints, all need to

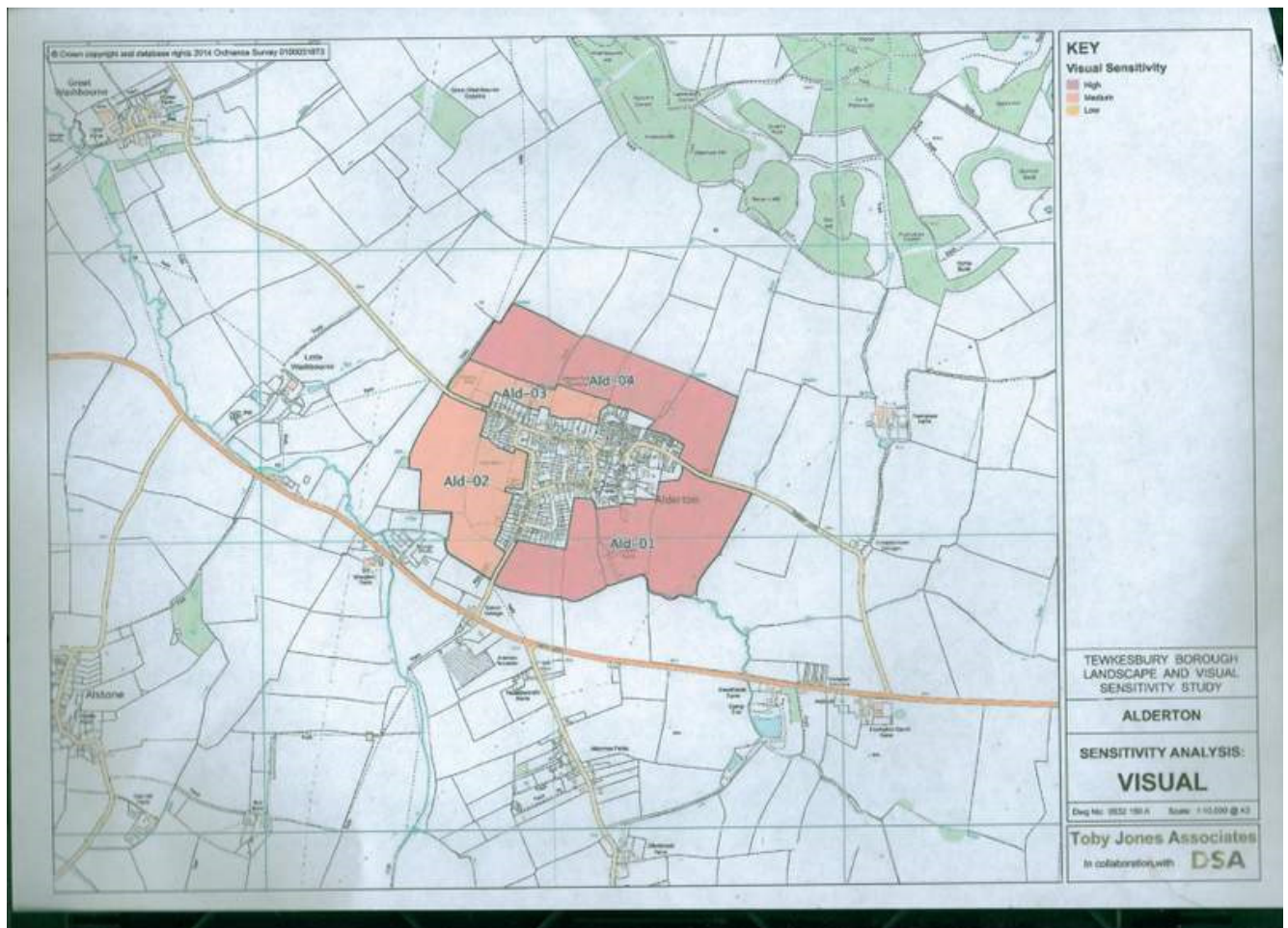
be weighed up in selecting appropriate sites. This suite of evidence base studies will inform an understanding of the capacity and suitability for development as opposed to the sensitivity considered in this report.

### **Alderton within this report**

Alderton sits at the base of Dumbleton Hill at the very edge of the AONB. Key sensitivities include the openness of these lower slopes and their role in creating the setting for the AONB. The sense of separation between Alderton and the B4077 is characteristic and vulnerable to insensitive development.

There is also a sensitivity around development that does not respect the generally clustered settlement form and that might appear conspicuous and prominent in the vale.

From this report the site sits within the land parcel Ald01 and is recorded as **high visual sensitivity**.



Visual Summary from this report concluded:

This is a prominent land assessment parcel exposed to the B4077 and the large number of people passing along it. The landform clearly rises from the road to the

village edge and provides a distinctive visual setting to the village and the AONB beyond. Much of the settlement edge is 20th century.

The key sensitivity here is the preservation of views to the historic village core and church from the south and east and to protect the visual relationship between the historic village core and the slopes down to the stream and the visual link to the B4077.

Development on this parcel could bring about a notable change in the settlement pattern and its relationship with the surrounding countryside.

Development within this parcel might cause the loss of established views of the Church and historic settlement edge.

### **Proportionality, Timing, and Village Cohesion**

Through definitions of social cohesion identified pertinent to this scenario, we will demonstrate that the harm the development will cause will outweigh the benefits. The negative impact on social cohesion within the community of Alderton that the proposed scale of development would have and which would render this development unsustainable in terms of the principles of the NPPF.

The question of Proportionality and timing are pertinent factors which need to be taken into consideration when assessing development of this scale, in such a small, compact environment as Alderton Village. The developers referred to it in their planning application.

Freeman Development stated in supporting the planning application in paragraph 7.48 of the Planning Statement that the proposal was considered to be the optimum amount of new houses to be delivered within Alderton. In paragraph 7.49 it was asserted that the site represented an opportunity to deliver enough housing in Alderton to meet the needs of the village for the next 20 years in a location which results in the least impact upon the character of the village.

#### ***This was before the Charles Church development was approved.***

Furthermore proportionality is discussed within the Service Village Forum who unanimously agreed that the JCS offers a balanced and proportionate view of development in the Service Villages. 752 houses in 12 villages over 20 years is on average 3 houses per village per year. The Service Village Forum encouraged individual communities to support the JCS at consultation.

The Tewkesbury Borough Council local and Alderton NDP plans are well developed. The Service Village Forum and local plans will be published for consultation during this appeal hearing's deliberations. These emerging plans will indicate that Alderton's allocation of houses will be in the region of 40 to 48 houses for the period

ending 2031 of which 47 have already been committed. The emerging plans will identify suitable and deliverable sites to fulfil the Objectively Assessed Need.

This current site is not considered suitable and a better site will be proposed to the west of the village of Alderton.

To approve further permissions at this time would render the emerging community led plans stillborn. The plans and community wishes would be thwarted both in terms of practical delivery of best outcomes but moreover in terms of crushing morale and motivation in what has so far been an exemplary example of responsive and responsible democracy.

We feel that a brief few months be given in which the local plans can be published in order that its conclusions and supporting evidence base can best inform the appeal decision. Not to wait risks making irreversible damage to our communities aspirations and to the hearts and minds which have worked so hard to make them a reality.

## **Conclusion**

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”.

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.”

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, TBC Local Plan, and NDP’s, 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,
- Protecting our communities, infrastructure and heritage against inappropriate and disproportionate opportunistic development.

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 in to allow the community to absorb additional residents on a sustainable basis and allow it to retain its well established community ethos.

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.

## A few quotes to ponder.

### House of Commons *Monday 18 March 2013*

**Sir Bob Russell (Colchester) (LD):** Is the Minister concerned about **urban creep into rural areas destroying the open countryside** within urban fringe fields and between towns and **adjoining villages**?

**Nick Boles:** I would be concerned if that were happening, but it is not and so I am not concerned.

\*\*\*\*\*

Speaking to the Sunday Times, Simon Jenkins said: 'He (**Mr Cameron**) pledged there that he would no more put the countryside at risk than his own family.'

.....

Written ministerial statement by Nick Boles on local planning.

The coalition government is committed to reforming the planning system to make it simpler, clearer and easier for people to use, **allowing local communities to shape where development should and should not go**. Planning should not be the exclusive preserve of lawyers, developers or town hall officials.

We are also committed to ensuring that countryside and environmental protections continue to be safeguarded, and devolving power down not just to local councils, but **also down to neighbourhoods and local residents**.

# Alderton Parish Council Proof of Evidence Statement

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Appeal Site: Land East of St Margarets Drive, Alderton

Appeal by: Freeman Homes

Against: Refusal of Outline Planning Permission

Appeal Proposal: Outline planning application for the erection of up to 60 no. dwellings and associated parking; vehicular access from St Margarets Drive; provision of open space; the construction of highways through the site and associated engineering works, including the creation of an attenuation pond. Demolition of 16 St. Margarets Drive.

**PINS Ref: APP/G1630/A/14/2222147**

## **PROOF OF EVIDENCE**





## Introduction

Alderton Parish Council are submitting the following Proof of Evidence not from the Parish Councillors perspective, but representing the views of local people who live in the village. We have the views of the great majority of the village behind us as can be shown in the Alderton Community Survey results in 2013 and more recently in October 2014 results which will inform the Alderton Neighbourhood Development Plan (NDP). Both surveys were well represented with 88% response rate for the Community survey and 75% for the NDP, so we can demonstrate and provide evidence of a strong understanding of the views of 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. The village is visible from a number of key viewpoints such as the adjacent Cotswolds Area of Outstanding Natural Beauty (AONB) and the B4077, a main artery into the Cotswolds. The village is situated in a Special Landscape Area abutting the boundary of the AONB.



It is 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 Local Planning Authority (Tewkesbury Borough Council) refused outline planning permission for land east of St. Margarets Drive for six reasons.

Alderton Parish fully agreed with the Council refusal for outline planning on the six reasons which were:

1. *The proposal, by virtue of its prominent open location to the south of Alderton would represent a significant encroachment into the surrounding rural landscape. This encroachment would have a harmful impact upon the character and appearance of the landscape within a Special Landscape Area which serves to protect the foreground setting of the nearby Area of Outstanding Natural Beauty. Furthermore, the proposed addition of up to 60 dwellings would be of a scale disproportionate to the existing settlement that would fail to maintain or enhance the vitality of Alderton which would have a harmful impact on the social wellbeing of the local community. The proposal therefore does not represent sustainable development within the context of paragraph 14 of the NPPF and the identified harms would significantly and demonstrably outweigh the benefits of the proposal. The proposed development is therefore contrary to the core principles of land-use planning set out at paragraph 17 of the NPPF, sections 6 (Delivering a wide choice of high quality homes), 8 (Promoting healthy communities) and 11 (Conserving and enhancing the natural environment) of the NPPF, policy LND2 of the Tewkesbury Borough Local Plan to 2011 - March 2006 and emerging policies SD2 and SD7 of the Pre-Submission Joint Core Strategy (April 2014).*
  
2. *The application does not provide housing that would be available to households who cannot afford to rent or buy houses available on the existing housing market. As such the proposed development conflicts with Policy HOU13 of the Tewkesbury Borough Local Plan to 2011 - March 2006 and policies SD12 and SD13 of the Pre-Submission Joint Core Strategy (April 2014).*
  
3. *The application does not make adequate provision for on-site or off-site outdoor playing space and playing pitches with changing facilities, to meet the needs of the proposed community. The application therefore conflicts with the section 8 of the NPPF (Promoting healthy communities), and Policy RCN1 of the Tewkesbury Borough Local Plan to 2011 - March 2006 and policies INF5 and INF7 of the Pre-Submission Joint Core Strategy (April 2014).*
  
4. *The application does not make provision for the delivery of secondary education infrastructure and library provision and therefore the proposed development is contrary to Policy GNL11 of the Tewkesbury Borough Local Plan to*

2011 - March 2006 and policies INF5 and INF7 of the Pre-Submission Joint Core Strategy (April 2014).

5. *The application does not make provision for on- and off-site community infrastructure and improved health care facilities and therefore the proposed development is contrary to Policy GNL11 of the Tewkesbury Borough Local Plan to 2012 - March 2006 and policies INF5 and INF7 of the Pre-Submission Joint Core Strategy (April 2014).*

6. *The application does not make provision for highway improvements and therefore conflicts with section 4 of the NPPF (Promoting sustainable transport) and Policy TPT1 of the Tewkesbury Borough Local Plan to 2011 - March 2006 and policies INF1, INF2 and INF7 of the Pre-Submission Joint Core Strategy (April 2014).*

Whilst the issues relating to points 2-6 may well be resolved in certain aspects, the Parish feel that there is some doubt that the unsustainability of the application by Freemans Development creates an adverse impact and significantly and demonstrably outweighs the benefits of a presumption in favour of sustainable development when assessed against the policies of the NPPF Framework.

### **Localism – The voice of the people who live in Alderton**

In the foreword by the Rt Hon Greg Clark MP, Minister of State for Decentralisation

*“A plain English guide to the Localism Act’ November 2011, the act is described as setting out a series of measures with the potential to achieve a substantial and lasting shift in power away from central government and towards local people. They include: new freedoms and flexibilities for local government; new rights and powers for communities and individuals; reform to make the planning system more democratic and more effective, and reform to ensure that decisions about housing are taken locally”.*

In October 2012, Alderton Parish Council was approached by the first of several prospective housing developers interested in submitting planning applications for medium to large scale housing developments within the Parish, notably outside the current agreed settlement boundary.

Within a month of this first approach, Alderton Parish Council had identified that there were two emerging priorities for the Parish and two methods of delivery to

achieve these. At a Parish Meeting held in November 2012, two groups made up of local volunteers were established: The Campaign Group and The Plan Group. The Campaign Group's role has been to focus on the present, concentrating on the preparation of the Parishes' responses to subsequent planning applications, the Plan Group's role has been to plan for the future – focussing on the evolution of the parish over the next twenty years.

### Alderton Plan Group key **Milestones**

- 27 November 2012 established, regular group meetings held
- 25 January 2013 Alderton Plan Group open meeting attended by over 65 residents
- 26/27 January 2013 approximately 200 residents visited the Alderton Plan Group exhibition in the Village Hall
- February 2013 distribution of Alderton Plan Group questionnaire to seek views from local residents and support the development of the Design Statement – 88% of residents responded to the survey
- 18/19 May 2013 Design Statement consultation in the Village Hall
- May – Sept. 2013 Plan Group prepare Design Statement with the support of Gloucestershire Rural Community Council and Tewkesbury Borough Council
- October 2013 Design Statement endorsed by Alderton Parish Council
- October 2013 Alderton Parish Council decides to produce a Neighbourhood Plan for Alderton Parish, TBC supports the application
- October 2013 The Alderton Plan Group becomes the Alderton Neighbourhood Plan Group (ANDP)

Alderton believes that any plan needs to be viable and community-led

The purpose of the ANDP is to look to the future and to enable the Parish to evolve in a way that local residents want to see.

We want to take advantage of our rights, as set out in the Localism Act, encouraging communities to harness their distinctive local awareness and skills and utilise these in a powerful way to shape development, giving local people a direct role in shaping their local planning policies.

We know that the national NDP guidance requires us to follow a set procedure, which includes significant levels of consultation with local residents, ultimately

seeking consensus on a final NDP, which when ‘made’ will become a legal document. We welcome this. The ANDP Group has consistently and actively sought a mandate to proceed with all priorities, objectives and proposals and will continue to do so.

The ANDP Group spent the first year researching what an NDP is, identifying what **Proposals** we want to focus on in our NDP (the content of our NDP will cover the following areas: Housing and Development, Local Character, Important Local Views and Important Local Green Spaces, Environment and Biodiversity and Community Safety and Facilities) and the **Vision** and **Objectives**, which, supported by our own policies will ensure delivery. We had an excellent Design Statement to build upon, which was informed by the 2013 Alderton Community Consultation responses. Section 4 of the 2013 Consultation Outcome Report provides the rationale behind this choice of headings and the 2014 Alderton Design Statement for landscape character and other salient information about the Parish and also results of the public consultations on design elements.

In engaging with the local community, the ANDP Group, with the support of GRCC through a grant from Locality, designed a ‘sense check’ household survey.

In October 2014, the ANDP Group distributed the second ‘**Alderton Matters**’ survey to local residents, 75% of whom completed and returned the questionnaire. The ANDP Group completed the analysis of the survey responses and presented the findings to a Parish Meeting on 13 November 2014.

The ANDP Group, and the Parish Council, believe that a 75% response rate from residents in the NDP Area has provided the Alderton NDP Group with a strong mandate to proceed to the next stage of developing the NDP – Writing the Plan and its associated Policies.

The summarised results of this survey from October 2014 are:

**Our Vision:** *endorsed by 84% of respondents in the October 2014 Parish NDP Survey*

*‘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.’*

We wish to see:

- A continuing choice of high-quality housing of an appropriate type, style and ownership and in proportionate numbers to the size of the Parish settlements.
- Current and future generations enjoying the special built and landscape character of the Parish and connecting with nature.

- Facilities, services and community spaces suitable for all ages, enhancing community cohesion, communications and overall health and wellbeing.

### **Our Objectives:**

Alderton NDP Objectives: *over 86% agreement in the October 2014 Parish NDP Survey*

- 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

**Housing and Development proposals for the NDP:** *over 82% agreement in the October 2014 Parish NDP Survey*

- 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

**Specific relevant survey results under the heading Housing and Development relating to the scale of development:**

- 51% preferred ‘a larger number of small developments’
- Maximum number of homes in any single development in Alderton Village settlement:
  - 27% - 10, 17% - 20, 16% - 5, 10% - 8

**Local character proposals for the NDP (including Important Local Views and Important Local Green Spaces):** *over 79% agreement in the October 2014 Parish NDP Survey*

- Any development to seek actively to conserve and enhance the distinctive character of Alderton Parish
- Design features on buildings to be rural rather than suburban in character in line with the Alderton Design Statement
- Development to reflect local characteristic building styles and materials
- New buildings to be no more than two storeys high
- A variety of designs in any new development as is typical of the built form of the Parish (i.e. avoid uniform development)
- Protection of the character and setting of listed properties
- Restoration of lost landscape features
- Avoid light pollution– no street lighting
- Avoid light pollution- window size and design in new buildings and extensions should not create undue artificial light
- Important landscape features e.g. hedgerows, trees, brooks, ponds, should be conserved
- Development located in places that creates least harm to the special landscape character, outstanding natural beauty and biodiversity of the Parish
- Preservation of key views\* to and from the AONB so that special landscape features can be enjoyed by future generations

\*Out of the 235 sets of questionnaires and appendices received, 210 households responded to questions relating to ‘Views’. Households were asked to indicate from a list of views, either within or from Alderton Village, those which were particularly important to them. The list was generated from consultation responses to the Alderton Design Statement and following a landscape character assessment carried out in 2013.

View G. From the B4077 to the southern flank of the village with attractive grouping of houses around church from the Winchcombe Way LDP, in particular views of church and Grade 2 listed cottages from field south of Church Road – received 71%

(149 individual responses) of respondents identifying View G as a Key View of particular importance. This was the highest scoring 'view' of the twelve listed (A – L) in the survey questionnaire.

**Environment and Biodiversity proposals for the NDP:** *over 85% agreement in the October 2014 Parish NDP Survey*

- Wildlife corridors to be created in new developments
- Scale of any proposed development to take account of key wildlife habitats and special areas of conservation / SSSIs in the Parish
- Remains of old orchards to be protected and orchards reinstated
- Planning applications to contain a full analysis of the impact of both pluvial (rain) and fluvial (river) flooding:
  - on the development and
  - on other locations/ properties
- Minimise surface water run-off from hard surfaces (ie Permeable surfaces for drives and car parking spaces)
- Sustainable construction that meets or exceeds government targets for a zero-carbon future
- High standards of developer/construction company and community relations:
  - construction noise to be kept to a minimum to minimise disruption to neighbours
  - air quality to be monitored by contractors during the construction period, reported and appropriate action taken

**Community Safety and Facilities proposals for NDP:** *over 76% agreement in the October 2015 Parish NDP Survey*

- Parking spaces Unobtrusive car parking should be available in new developments for at least two cars per dwelling, plus additional occasional car parking spaces for visitors and deliveries.
- Visual impact of car parking spaces to be minimised by trees, shrubs, wooden gates and other features
- Creation of new footpaths between the Alderton settlements
- Link parish settlements with the wider cycle route network
- Preserve the rural character of footpaths and lanes in the parish
- Impact on traffic flow and movement to be considered as part of any business development planning application
- Impact on traffic flow and movement to be considered as part of the planning application of any development of over homes
- Design of layout of new development not to impede safety
- Design, layout and location of new development not to impede access by emergency vehicles

- Urbanising features (e.g. speed bumps, excessive road signage, paved over verges) to be kept to the minimum necessary for road safety in order to preserve the rural character of the Parish

Respondents to the survey were also invited to describe what 'community cohesion' meant to them. If you enter the phrase 'community cohesion' into an internet search engine you will find a range of definitions. However, we believe that the only true definition of this phrase is the one defined by the community it pertains to. Here is a selection of definitions provided by residents of Alderton Parish within their responses to the October 2014 Parish NDP Survey:

*The community has an identity - that people feel they 'belong', that everyone pulls together. NOT an anonymous collection of people who don't know each other and who just 'happen' to live there"*

*Sticking together with a common sense of purpose*

*A community speaking with one voice*

*A community working together, supporting each other, participating in community events are upholding everything that has made the place special*

*A good community spirit, a sense of belonging, where people live and work in harmony*

*Residents care for each other and involve themselves in and support village institutions such as the church, school and local businesses*

*Residents feel part of a supportive community, and consequently care about fellow residents, the local environment and the success of businesses and amenities within the community*

*Developing and maintaining a sense of identity and pride in the environment and community. This means managing growth in housing and facilities and the way that changes are made so as to be in keeping with the needs of the village and the views of its residents*

*All villagers working together and living in harmony, thus creating a village which is a joy to live in for all generations*

*It means all villagers joining in together without creating "them and us"*

## **Service Village Forum**

The Service Village Forum's membership is made up of Parish Council representatives of the twelve settlements identified as Service Villages in the emerging Joint Core Strategy. The forum is regularly attended by officers of



Tewkesbury Borough Council and an elected Borough Councillor at the invitation of the members. The Forum’s aims include the representation of the Service Villages and the support of those making formal development plans in our geographical area. The Service Village Forum is supported by the Gloucestershire Rural Community Council. It is a collaborative project addressing, in a tangible way, the ideals described by Government such as “Community Led Planning” and “the Big Society.”

The stated objectives of the forum are:

<p>1. Knowledge</p> <p>a. Keep each other up to date with each Service Village’s situation and actions.</p>
<p>2. Representation</p> <p>a. Give stronger messages to the Borough</p> <p>b. Give stronger messages to Joint Core Strategy</p>
<p>3. Neighbourhood Development Plans</p> <p>a. Share knowledge</p> <p>b. Share resources</p>
<p>4. Housing allocation</p> <p>a. Work together to identify an appropriate number of houses required in the Service Villages over the JCS period of 2011 to 2031</p> <p>b. Work together to allocate the identified number of houses within the Service Villages</p>
<p>5. Project Life</p> <p>a. Project to run until Joint Core Strategy is ratified.</p>

The Service Village Forum seeks to support those preparing formal plans. The formal plans fall into three categories being;

- The Joint Core Strategy
- Tewkesbury Borough Council Local Plan
- Neighbourhood Development Plans

### **The Joint Core Strategy (JCS)**

The JCS was prepared by Cheltenham, Gloucester and Tewkesbury Councils supported by Gloucestershire County Council. The Joint Core Strategy (JCS) is a key part of the development plan for the area. It is an important document because

it sets out the identified need and location for housing and employment, and supporting infrastructure, in our areas up to 2031. The planning system is 'plan-led' – this means that development proposals have to be in accordance with the policies and proposals of the development plan unless there are good planning reasons to set them aside. Without a Joint Core Strategy, therefore, we significantly increase the risk of being unable to prevent or control unplanned development.

The JCS was submitted to the Secretary of State in November 2014 and Spring 2015 sees the examination period.

Distribution of development is described in Policy SP2.

#### **Policy SP2: Distribution of New Development - Part 2**

Over the plan period to 2031, land will be provided for about 31,040 new homes and for about 64 hectares of employment land, to support about 28,000 new jobs.

- Gloucester and its urban extensions will accommodate about 11,820 new homes
- Cheltenham and its urban extensions will accommodate about 10,655 new homes
- Elsewhere within Tewkesbury Borough development will accommodate about 8,565 new homes. This will be met:
  - through strategic allocations at Ashchurch
  - through smaller scale development meeting local needs at
    - Tewkesbury town in accordance with its role as a market town,
    - and at rural service centres
    - and service villages.

#### **Policy SP2: Distribution of New Development - Part 4**

Rural service centres and service villages as identified in Table SP2c below will accommodate lower levels of development to be allocated through the Tewkesbury Borough Plan and Neighbourhood Plans, proportional 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. Over the plan period to 2031:

- The rural service centres will accommodate 1860 new homes, and
- The service villages will accommodate 752 new homes

## Tewkesbury Borough Council Local Plan

The Service Village Forum has participated in four key stages of the development of Tewkesbury Borough Council's Local Plan. The overall aspiration is to assist Tewkesbury Borough Council to prepare a plan which can be supported by each of the twelve Service Villages and is consistent with NDP's as they are produced, and is consistent with the JCS.

<b>Disaggregation</b>	<b>Qualitative Assessment</b>	<b>Site allocations</b>	<b>Influence &amp; Support TBC Local Plan</b>
<p>Evidence based allocation of 752 houses around the 12 Service Villages in accordance with the principles described in the NPPF and JCS being</p> <ul style="list-style-type: none"> <li>• Size</li> <li>• Function</li> <li>• Proximity &amp; Accessibility to Cheltenham and Gloucester</li> </ul>	<p>Examination of deliverability of the disaggregation allocations and identification of constraints to development.</p>	<p>Facilitate dialogue between Tewkesbury Borough Council and individual Service Villages in the identification of sites capable of delivering 752 houses in the period to 2031.</p>	<p>Offer pre-publication opinion and feedback concerning the content and presentation of Tewkesbury Borough Council's Local Plan.</p>

At the time of writing, these processes are nearing an end and it is hoped that TBC's first draft for public consultation will be published in February 2015. Work continues to fine tune the disaggregation calculations but the principles and bulk of the core data is complete. Taking core data Alderton is currently ranked as follows against each of the sub-headed categories.

Size – 7<sup>th</sup> out of 12

Function – 5<sup>th</sup> out of 12

Proximity – 10<sup>th</sup> out of 12

The weighting of each of the three sub-headed categories is still being debated but at the extremes of the spectrum, the allocation for Alderton is in the ranges between 40 and 48 for the period from 2011 to 2031.

### **Aldertons Transport Concerns**

The National Planning Policy Framework (NPPF) 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. Alderton's remote location means it is necessary to have an independent means of transport for work, leisure, health and many other forms of activity in the local area.

This is evidenced by the 2013 Alderton Parish Consultation Outcomes Report and is reinforced by the lack of a regular and frequent Public Transport Service. Although retired residents are supported by current bus services, services are very limited as evidenced by the Bus Timetables. The NPPF requirement is to build in places where it is possible to engage in cycling, walking and taking the bus to work and our concern is that this is not being met.

Thus the very nature of Alderton's location makes car ownership a necessity, but by the same token its residents actively choose to live there because of its relative separation from larger settlements.

All access routes in and out of the village are in the main single track roads. The new agreed development proposes parking for 103 cars. This development will add a further 130+ vehicles. This will significantly impact on the traffic flow through roads within the village which are narrow, along which many houses have no off-street parking, and the roads are generally restricted by parked cars.

However it is not just the impact on roads within the village that needs to be taken into consideration but also the knock on effect on the main roads outside the village such as the B4077, and the A46, coupled with the effect of other new developments within the area such as at Winchcombe our nearest small town. Both these aspects raise the question of Road Safety, particularly as the B4077 has been the scene of 2 fatal accidents in the last 12- 24 months.

In summary, the proposed new development will merely seek to increase the necessity for car travel and will have an impact on village roads that are ill-suited to cope with such an increase, particularly at the main access and egress points. This completely contradicts the sustainability principle of the NPPF.

### **Aldertons Employment Concerns**

Employment is key when determining if development is sustainable. Housing should be located where people can walk, cycle or use public transport to travel to work.

75% of Alderton residents commute to work, compared with 68.5% in Tewkesbury Borough and 57% in England.<sup>1</sup> This percentage would increase with the approved 47 additional households. This is contrary to NPPF intentions. Universal Jobmatch produces no current vacancies within a 5 mile radius, the nearest jobs are located in Tewkesbury, 8 miles distant, Cheltenham 12 miles and Gloucester 20 miles. NPPF states development should be planned to minimize journeys to employment, additional houses in Alderton conflicts with this, residents typically commute.

Many employment opportunities in Gloucestershire, full-time and part-time, require employees to be flexible and prepared to work evenings or weekend shifts. Large scale recruitment in the past six months has been predominantly in retail, hospitality and care sectors. These predominantly part-time jobs were not accessible to Alderton residents by public transport. Financial service sector is also increasingly employing staff on shifts including Capita, Endsleigh and LloydsTSB. Slow broadband speeds adversely impact upon home working.

Barriers created by lack of access to public transport to reach employment are exacerbated for young people; many cannot drive or afford to buy and run vehicles. Youth unemployment in Tewkesbury has only reduced by 3.8% between January 2013 and January 2014. In contrast, Gloucestershire's youth unemployment has reduced by 26%. Youth Contract is a government scheme introduced to help tackle this issue. Sector based work academies, part of the government's Youth Contract, offer training and work experience. Full-time attendance is required, but bus services are too infrequent to enable Alderton people to attend these in Gloucester, Cheltenham or Tewkesbury. Tewkesbury Local Authority also has the highest proportion of young people (4.9%) not in Education, Employment or Training in Gloucestershire. <sup>2</sup>

There is no strategic policy to deliver new jobs near Alderton. The proposal is not for sustainable development, making it easier for jobs to be created, increase prosperity or improving quality of people's lives. Neither is it a rural exception site to accommodate current residents with existing employment connections.

NPPF directs that Local Authority strategy for housing and employment is integrated; allowing property developers to determine housing locations does not permit this required integration.

## **Aldertons Housing Concerns**

A key argument for this development is that Tewkesbury Borough Council cannot demonstrate a 5 year land supply and that puts them in breach of their statutory requirement. The question becomes to whom is there material harm because of this

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<sup>1</sup> National Office of Statistics

<sup>2</sup> Gloucestershire County Council January 2014

breach? Primarily the local residents themselves with quality of life issues, then the building industry as a stakeholder in the planning system and then those people who are unable to house themselves.

In Tewkesbury Borough Councils local plan (3), the Council recognised the difficulty faced by families living on low incomes in rural areas. They proposed sites should be small in size, located in or adjoining villages and where there were adequate local facilities. This proposed development provides 35% of affordable housing which significantly exceeds local requirements within Alderton. The approved development of 47 houses and the 15 affordable homes this contains exceeded our own survey of affordable housing needs in 2010 (4).

By solving the issue of a lack of land supply we are creating another; building houses for those in need of housing is important, but just as important is building houses where people can sustain themselves through the local services and infrastructure. Making up the required numbers in a sustainable location has to be a preferred solution than the decision to build affordable houses in unsustainable locations.

### **Local Schooling**

The Governing Body has considered this planning proposal and, on their behalf, I would comment also as follows:

1. Numbers on Roll (NOR) – the facts at the moment are that we have 105 total places and 86 NOR so spare capacity of 19. There are 10.75 children forecast from the approved development at Beckford Road which we still think is too low. We do not understand how we can be predicted a possible fall in roll in the next few years whereas in fact The National Pupil Projection Numbers forecast a rise in school population between 2015 and 2020 of 9%. Should this occur then Oak Hill could not cope with the increase in it's population that the new proposed development East of St Margaret's Drive would create.

Presently, in some year groups we are full i.e. 15 or more in a year group. The projected increase in pupil numbers cannot forecast the year group these children will fall into and whilst in some cases it may prove beneficial to the school, it may also be detrimental in presenting unmanageable problems in maintaining equilibrium in class sizes and teaching groups. No doubt the latter would cause uproar from parents.

2. We have no capacity to extend our existing school buildings, either in Dumbleton or Alderton (remember that infants are in Dumbleton and Juniors in Alderton). Accordingly, extra monies are of no use unless they are sufficient to sustain a manageable and quality education and enable school buildings to be

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<sup>3</sup> Tewkesbury Borough Local Plan to 2011 - Affordable Housing Policy HOU14.

<sup>4</sup> Alderton Parish Housing Needs Survey April 2010

rebuilt/relocated which is very clearly not desirable as the threat would be to build a new school and the likelihood is that Dumbleton and/or Alderton would lose its school and the character and history of our rural faith school would be lost forever.

3. Furthermore, the prospect of section 106 monies may be seen as a “fix all” solution, whereby “**one off**” finance is made available as a means of solving the problem. However, the two sites of Oak Hill School do not lend themselves to material development in a temporary or permanent form. Space is extremely limited and would deny pupils active recreation space for out of class activities and breaks.

The s106 monies offered may well pay for additional staffing but there is no capacity to enable separate classes to be taught, particularly at Dumbleton. It is highly unlikely the school funding formula for subsequent years would sustain the subsequent financial shortfall. In short, the s106 money would be a "quick fix".

Accordingly, and as mentioned previously, development on the scale planned is a real threat to the school as it could not accommodate all the forecast children. We would be averse to a sudden influx of pupils that may serve to disrupt the efficient means of management already in place, detracting from the environment which presently makes parents feel their children are part of a caring and unique school.

## **The Visual Impact.**

Local Planning Authorities reason for refusal

*The proposal, by virtue of its prominent open location to the south of Alderton would represent a significant encroachment into the surrounding rural landscape. This encroachment would have a harmful impact upon the character and appearance of the landscape within a Special Landscape Area which serves to protect the foreground setting of the nearby Area of Outstanding Natural Beauty. Furthermore, the proposed addition of up to 60 dwellings would be of a scale disproportionate to the existing settlement that would fail to maintain or enhance the vitality of Alderton which would have a harmful impact on the social wellbeing of the local community. The proposal therefore does not represent sustainable development within the context of paragraph 14 of the NPPF and the identified harms would significantly and demonstrably outweigh the benefits of the proposal. The proposed development is therefore contrary to the core principles of land-use planning set out at paragraph 17 of the NPPF, sections 6 (Delivering a wide choice of high quality homes), 8 (Promoting healthy communities) and 11 (Conserving and enhancing the natural environment) of the NPPF, policy LND2 of the Tewkesbury Borough Local Plan to 2011 - March 2006 and emerging policies SD2 and SD7 of the Pre-Submission Joint Core Strategy (April 2014).*

Alderton parish are concerned about the visual impact this development will have on the Alderton rural landscape. For a number of reasons:

1. The huge visual impact this proposed development would have on the beautiful, charming village of Alderton.
2. The opinion of the majority of the residents of the village in a recent survey stating that 84% wish “to protect and enhance the special landscape of Alderton Parish, its extensive open views, natural beauty and biodiversity.” The view that was most important to the locals according to the survey is that from the B4077 to the southern flank of the village with attractive grouping of houses around the Church, which includes listed thatched cottages.
3. Description of this view. The fact that the B4077 is the gateway to the Cotswolds and was a Turnpike from 1726 to 1872. Thus travellers have enjoyed the view of the ancient Church for many centuries .The view would be completely obliterated by the proposed development. Alderton, would therefore, lose its landmarks and as a result its identity.
4. The above survey also stated that villagers also treasured the view from Church Road towards The Great Western Railway line with it’s steam engine nestled in the valley below Langley Hill.
5. The disproportionate scale of this development and high-density housing will definitely impact on the visual character of the village and will look like a housing estate bolted on to an historical village. It would have a negative impact.

### **Tewkesbury Borough Landscape and Visual Sensitivity Study**

Tewkesbury Borough Council commissioned Toby Jones Associates Ltd in September 2014 to evaluate all land surrounding rural service centres and service villages as identified in the Joint Core Strategy in terms of landscape and visual sensitivity to residential development.

This study identifies issues and sensitivities that should be taken in to account when considering new development around the Rural Service Centres and Service Villages. Whilst the primary focus is that of residential development, the findings can equally inform decisions about other types of development.

This report forms part of a wider evidence base that will ultimately inform the identification of the most suitable sites for new development through the Tewkesbury Borough Plan. This report provides an evaluation of landscape and visual sensitivity; it does not seek to make a definitive judgement on the suitability of sites for development.

A package of studies and considerations, including infrastructure capacity, ecology, townscape sensitivity, heritage, flood risk and other detail site constraints, all need to



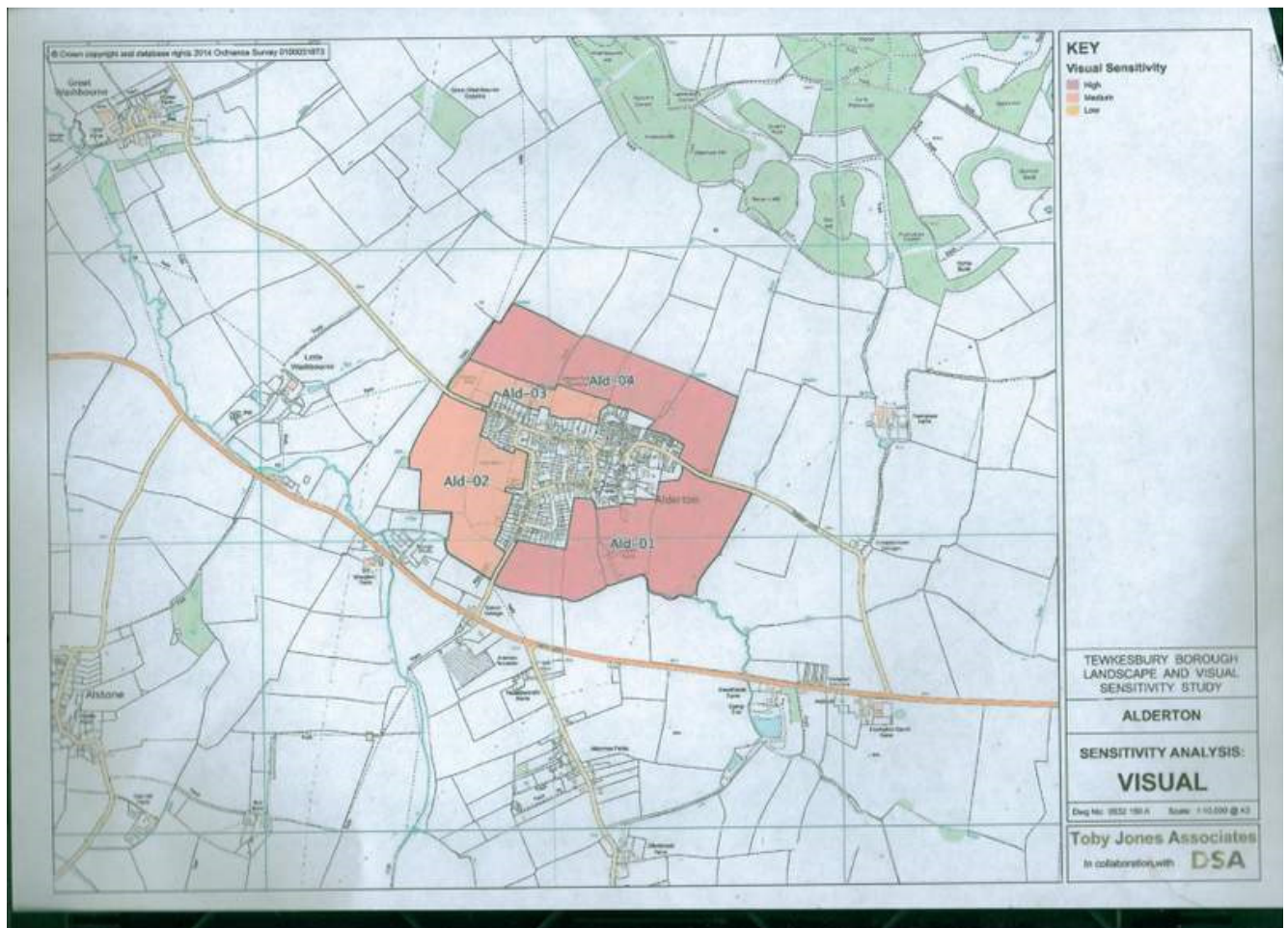
be weighed up in selecting appropriate sites. This suite of evidence base studies will inform an understanding of the capacity and suitability for development as opposed to the sensitivity considered in this report.

### **Alderton within this report**

Alderton sits at the base of Dumbleton Hill at the very edge of the AONB. Key sensitivities include the openness of these lower slopes and their role in creating the setting for the AONB. The sense of separation between Alderton and the B4077 is characteristic and vulnerable to insensitive development.

There is also a sensitivity around development that does not respect the generally clustered settlement form and that might appear conspicuous and prominent in the vale.

From this report the site sits within the land parcel Ald01 and is recorded as **high visual sensitivity**.



Visual Summary from this report concluded:

This is a prominent land assessment parcel exposed to the B4077 and the large number of people passing along it. The landform clearly rises from the road to the

village edge and provides a distinctive visual setting to the village and the AONB beyond. Much of the settlement edge is 20th century.

The key sensitivity here is the preservation of views to the historic village core and church from the south and east and to protect the visual relationship between the historic village core and the slopes down to the stream and the visual link to the B4077.

Development on this parcel could bring about a notable change in the settlement pattern and its relationship with the surrounding countryside.

Development within this parcel might cause the loss of established views of the Church and historic settlement edge.

### **Proportionality, Timing, and Village Cohesion**

Through definitions of social cohesion identified pertinent to this scenario, we will demonstrate that the harm the development will cause will outweigh the benefits. The negative impact on social cohesion within the community of Alderton that the proposed scale of development would have and which would render this development unsustainable in terms of the principles of the NPPF.

The question of Proportionality and timing are pertinent factors which need to be taken into consideration when assessing development of this scale, in such a small, compact environment as Alderton Village. The developers referred to it in their planning application.

Freeman Development stated in supporting the planning application in paragraph 7.48 of the Planning Statement that the proposal was considered to be the optimum amount of new houses to be delivered within Alderton. In paragraph 7.49 it was asserted that the site represented an opportunity to deliver enough housing in Alderton to meet the needs of the village for the next 20 years in a location which results in the least impact upon the character of the village.

#### ***This was before the Charles Church development was approved.***

Furthermore proportionality is discussed within the Service Village Forum who unanimously agreed that the JCS offers a balanced and proportionate view of development in the Service Villages. 752 houses in 12 villages over 20 years is on average 3 houses per village per year. The Service Village Forum encouraged individual communities to support the JCS at consultation.

The Tewkesbury Borough Council local and Alderton NDP plans are well developed. The Service Village Forum and local plans will be published for consultation during this appeal hearing's deliberations. These emerging plans will indicate that Alderton's allocation of houses will be in the region of 40 to 48 houses for the period

ending 2031 of which 47 have already been committed. The emerging plans will identify suitable and deliverable sites to fulfil the Objectively Assessed Need.

This current site is not considered suitable and a better site will be proposed to the west of the village of Alderton.

To approve further permissions at this time would render the emerging community led plans stillborn. The plans and community wishes would be thwarted both in terms of practical delivery of best outcomes but moreover in terms of crushing morale and motivation in what has so far been an exemplary example of responsive and responsible democracy.

We feel that a brief few months be given in which the local plans can be published in order that its conclusions and supporting evidence base can best inform the appeal decision. Not to wait risks making irreversible damage to our communities aspirations and to the hearts and minds which have worked so hard to make them a reality.

## **Conclusion**

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”.

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.”

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, TBC Local Plan, and NDP’s, 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,
- Protecting our communities, infrastructure and heritage against inappropriate and disproportionate opportunistic development.

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 in to allow the community to absorb additional residents on a sustainable basis and allow it to retain its well established community ethos.

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.

## A few quotes to ponder.

### House of Commons *Monday 18 March 2013*

**Sir Bob Russell (Colchester) (LD):** Is the Minister concerned about **urban creep into rural areas destroying the open countryside** within urban fringe fields and between towns and **adjoining villages**?

**Nick Boles:** I would be concerned if that were happening, but it is not and so I am not concerned.

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Speaking to the Sunday Times, Simon Jenkins said: 'He (**Mr Cameron**) pledged there that he would no more put the countryside at risk than his own family.'

.....

Written ministerial statement by Nick Boles on local planning.

The coalition government is committed to reforming the planning system to make it simpler, clearer and easier for people to use, **allowing local communities to shape where development should and should not go**. Planning should not be the exclusive preserve of lawyers, developers or town hall officials.

We are also committed to ensuring that countryside and environmental protections continue to be safeguarded, and devolving power down not just to local councils, but **also down to neighbourhoods and local residents**.

# Alderton Parish Council Proof of Evidence Statement

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Appeal Site: Land East of St Margarets Drive, Alderton

Appeal by: Freeman Homes

Against: Refusal of Outline Planning Permission

Appeal Proposal: Outline planning application for the erection of up to 60 no. dwellings and associated parking; vehicular access from St Margarets Drive; provision of open space; the construction of highways through the site and associated engineering works, including the creation of an attenuation pond. Demolition of 16 St. Margarets Drive.

**PINS Ref: APP/G1630/A/14/2222147**

## **PROOF OF EVIDENCE**





## Introduction

Alderton Parish Council are submitting the following Proof of Evidence not from the Parish Councillors perspective, but representing the views of local people who live in the village. We have the views of the great majority of the village behind us as can be shown in the Alderton Community Survey results in 2013 and more recently in October 2014 results which will inform the Alderton Neighbourhood Development Plan (NDP). Both surveys were well represented with 88% response rate for the Community survey and 75% for the NDP, so we can demonstrate and provide evidence of a strong understanding of the views of 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. The village is visible from a number of key viewpoints such as the adjacent Cotswolds Area of Outstanding Natural Beauty (AONB) and the B4077, a main artery into the Cotswolds. The village is situated in a Special Landscape Area abutting the boundary of the AONB.

It is 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 Local Planning Authority (Tewkesbury Borough Council) refused outline planning permission for land east of St. Margarets Drive for six reasons.

Alderton Parish fully agreed with the Council refusal for outline planning on the six reasons which were:

1. *The proposal, by virtue of its prominent open location to the south of Alderton would represent a significant encroachment into the surrounding rural landscape. This encroachment would have a harmful impact upon the character and appearance of the landscape within a Special Landscape Area which serves to protect the foreground setting of the nearby Area of Outstanding Natural Beauty. Furthermore, the proposed addition of up to 60 dwellings would be of a scale disproportionate to the existing settlement that would fail to maintain or enhance the vitality of Alderton which would have a harmful impact on the social wellbeing of the local community. The proposal therefore does not represent sustainable development within the context of paragraph 14 of the NPPF and the identified harms would significantly and demonstrably outweigh the benefits of the proposal. The proposed development is therefore contrary to the core principles of land-use planning set out at paragraph 17 of the NPPF, sections 6 (Delivering a wide choice of high quality homes), 8 (Promoting healthy communities) and 11 (Conserving and enhancing the natural environment) of the NPPF, policy LND2 of the Tewkesbury Borough Local Plan to 2011 - March 2006 and emerging policies SD2 and SD7 of the Pre-Submission Joint Core Strategy (April 2014).*
  
2. *The application does not provide housing that would be available to households who cannot afford to rent or buy houses available on the existing housing market. As such the proposed development conflicts with Policy HOU13 of the Tewkesbury Borough Local Plan to 2011 - March 2006 and policies SD12 and SD13 of the Pre-Submission Joint Core Strategy (April 2014).*
  
3. *The application does not make adequate provision for on-site or off-site outdoor playing space and playing pitches with changing facilities, to meet the needs of the proposed community. The application therefore conflicts with the section 8 of the NPPF (Promoting healthy communities), and Policy RCN1 of the Tewkesbury Borough Local Plan to 2011 - March 2006 and policies INF5 and INF7 of the Pre-Submission Joint Core Strategy (April 2014).*
  
4. *The application does not make provision for the delivery of secondary education infrastructure and library provision and therefore the proposed development is contrary to Policy GNL11 of the Tewkesbury Borough Local Plan to*

2011 - March 2006 and policies INF5 and INF7 of the Pre-Submission Joint Core Strategy (April 2014).

5. *The application does not make provision for on- and off-site community infrastructure and improved health care facilities and therefore the proposed development is contrary to Policy GNL11 of the Tewkesbury Borough Local Plan to 2012 - March 2006 and policies INF5 and INF7 of the Pre-Submission Joint Core Strategy (April 2014).*

6. *The application does not make provision for highway improvements and therefore conflicts with section 4 of the NPPF (Promoting sustainable transport) and Policy TPT1 of the Tewkesbury Borough Local Plan to 2011 - March 2006 and policies INF1, INF2 and INF7 of the Pre-Submission Joint Core Strategy (April 2014).*

Whilst the issues relating to points 2-6 may well be resolved in certain aspects, the Parish feel that there is some doubt that the unsustainability of the application by Freemans Development creates an adverse impact and significantly and demonstrably outweighs the benefits of a presumption in favour of sustainable development when assessed against the policies of the NPPF Framework.

### **Localism – The voice of the people who live in Alderton**

In the foreword by the Rt Hon Greg Clark MP, Minister of State for Decentralisation

*“A plain English guide to the Localism Act’ November 2011, the act is described as setting out a series of measures with the potential to achieve a substantial and lasting shift in power away from central government and towards local people. They include: new freedoms and flexibilities for local government; new rights and powers for communities and individuals; reform to make the planning system more democratic and more effective, and reform to ensure that decisions about housing are taken locally”.*

In October 2012, Alderton Parish Council was approached by the first of several prospective housing developers interested in submitting planning applications for medium to large scale housing developments within the Parish, notably outside the current agreed settlement boundary.

Within a month of this first approach, Alderton Parish Council had identified that there were two emerging priorities for the Parish and two methods of delivery to



achieve these. At a Parish Meeting held in November 2012, two groups made up of local volunteers were established: The Campaign Group and The Plan Group. The Campaign Group's role has been to focus on the present, concentrating on the preparation of the Parishes' responses to subsequent planning applications, the Plan Group's role has been to plan for the future – focussing on the evolution of the parish over the next twenty years.

### Alderton Plan Group key **Milestones**

- 27 November 2012 established, regular group meetings held
- 25 January 2013 Alderton Plan Group open meeting attended by over 65 residents
- 26/27 January 2013 approximately 200 residents visited the Alderton Plan Group exhibition in the Village Hall
- February 2013 distribution of Alderton Plan Group questionnaire to seek views from local residents and support the development of the Design Statement – 88% of residents responded to the survey
- 18/19 May 2013 Design Statement consultation in the Village Hall
- May – Sept. 2013 Plan Group prepare Design Statement with the support of Gloucestershire Rural Community Council and Tewkesbury Borough Council
- October 2013 Design Statement endorsed by Alderton Parish Council
- October 2013 Alderton Parish Council decides to produce a Neighbourhood Plan for Alderton Parish, TBC supports the application
- October 2013 The Alderton Plan Group becomes the Alderton Neighbourhood Plan Group (ANDP)

Alderton believes that any plan needs to be viable and community-led

The purpose of the ANDP is to look to the future and to enable the Parish to evolve in a way that local residents want to see.

We want to take advantage of our rights, as set out in the Localism Act, encouraging communities to harness their distinctive local awareness and skills and utilise these in a powerful way to shape development, giving local people a direct role in shaping their local planning policies.

We know that the national NDP guidance requires us to follow a set procedure, which includes significant levels of consultation with local residents, ultimately

seeking consensus on a final NDP, which when ‘made’ will become a legal document. We welcome this. The ANDP Group has consistently and actively sought a mandate to proceed with all priorities, objectives and proposals and will continue to do so.

The ANDP Group spent the first year researching what an NDP is, identifying what **Proposals** we want to focus on in our NDP (the content of our NDP will cover the following areas: Housing and Development, Local Character, Important Local Views and Important Local Green Spaces, Environment and Biodiversity and Community Safety and Facilities) and the **Vision** and **Objectives**, which, supported by our own policies will ensure delivery. We had an excellent Design Statement to build upon, which was informed by the 2013 Alderton Community Consultation responses. Section 4 of the 2013 Consultation Outcome Report provides the rationale behind this choice of headings and the 2014 Alderton Design Statement for landscape character and other salient information about the Parish and also results of the public consultations on design elements.

In engaging with the local community, the ANDP Group, with the support of GRCC through a grant from Locality, designed a ‘sense check’ household survey.

In October 2014, the ANDP Group distributed the second ‘**Alderton Matters**’ survey to local residents, 75% of whom completed and returned the questionnaire. The ANDP Group completed the analysis of the survey responses and presented the findings to a Parish Meeting on 13 November 2014.

The ANDP Group, and the Parish Council, believe that a 75% response rate from residents in the NDP Area has provided the Alderton NDP Group with a strong mandate to proceed to the next stage of developing the NDP – Writing the Plan and its associated Policies.

The summarised results of this survey from October 2014 are:

**Our Vision:** *endorsed by 84% of respondents in the October 2014 Parish NDP Survey*

*‘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.’*

We wish to see:

- A continuing choice of high-quality housing of an appropriate type, style and ownership and in proportionate numbers to the size of the Parish settlements.
- Current and future generations enjoying the special built and landscape character of the Parish and connecting with nature.

- Facilities, services and community spaces suitable for all ages, enhancing community cohesion, communications and overall health and wellbeing.

### **Our Objectives:**

Alderton NDP Objectives: *over 86% agreement in the October 2014 Parish NDP Survey*

- 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

**Housing and Development proposals for the NDP:** *over 82% agreement in the October 2014 Parish NDP Survey*

- 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

**Specific relevant survey results under the heading Housing and Development relating to the scale of development:**

- 51% preferred ‘a larger number of small developments’
- Maximum number of homes in any single development in Alderton Village settlement:
  - 27% - 10, 17% - 20, 16% - 5, 10% - 8

**Local character proposals for the NDP (including Important Local Views and Important Local Green Spaces):** *over 79% agreement in the October 2014 Parish NDP Survey*

- Any development to seek actively to conserve and enhance the distinctive character of Alderton Parish
- Design features on buildings to be rural rather than suburban in character in line with the Alderton Design Statement
- Development to reflect local characteristic building styles and materials
- New buildings to be no more than two storeys high
- A variety of designs in any new development as is typical of the built form of the Parish (i.e. avoid uniform development)
- Protection of the character and setting of listed properties
- Restoration of lost landscape features
- Avoid light pollution– no street lighting
- Avoid light pollution- window size and design in new buildings and extensions should not create undue artificial light
- Important landscape features e.g. hedgerows, trees, brooks, ponds, should be conserved
- Development located in places that creates least harm to the special landscape character, outstanding natural beauty and biodiversity of the Parish
- Preservation of key views\* to and from the AONB so that special landscape features can be enjoyed by future generations

\*Out of the 235 sets of questionnaires and appendices received, 210 households responded to questions relating to ‘Views’. Households were asked to indicate from a list of views, either within or from Alderton Village, those which were particularly important to them. The list was generated from consultation responses to the Alderton Design Statement and following a landscape character assessment carried out in 2013.

View G. From the B4077 to the southern flank of the village with attractive grouping of houses around church from the Winchcombe Way LDP, in particular views of church and Grade 2 listed cottages from field south of Church Road – received 71%

(149 individual responses) of respondents identifying View G as a Key View of particular importance. This was the highest scoring 'view' of the twelve listed (A – L) in the survey questionnaire.

**Environment and Biodiversity proposals for the NDP:** *over 85% agreement in the October 2014 Parish NDP Survey*

- Wildlife corridors to be created in new developments
- Scale of any proposed development to take account of key wildlife habitats and special areas of conservation / SSSIs in the Parish
- Remains of old orchards to be protected and orchards reinstated
- Planning applications to contain a full analysis of the impact of both pluvial (rain) and fluvial (river) flooding:
  - on the development and
  - on other locations/ properties
- Minimise surface water run-off from hard surfaces (ie Permeable surfaces for drives and car parking spaces)
- Sustainable construction that meets or exceeds government targets for a zero-carbon future
- High standards of developer/construction company and community relations:
  - construction noise to be kept to a minimum to minimise disruption to neighbours
  - air quality to be monitored by contractors during the construction period, reported and appropriate action taken

**Community Safety and Facilities proposals for NDP:** *over 76% agreement in the October 2015 Parish NDP Survey*

- Parking spaces Unobtrusive car parking should be available in new developments for at least two cars per dwelling, plus additional occasional car parking spaces for visitors and deliveries.
- Visual impact of car parking spaces to be minimised by trees, shrubs, wooden gates and other features
- Creation of new footpaths between the Alderton settlements
- Link parish settlements with the wider cycle route network
- Preserve the rural character of footpaths and lanes in the parish
- Impact on traffic flow and movement to be considered as part of any business development planning application
- Impact on traffic flow and movement to be considered as part of the planning application of any development of over homes
- Design of layout of new development not to impede safety
- Design, layout and location of new development not to impede access by emergency vehicles

- Urbanising features (e.g. speed bumps, excessive road signage, paved over verges) to be kept to the minimum necessary for road safety in order to preserve the rural character of the Parish

Respondents to the survey were also invited to describe what 'community cohesion' meant to them. If you enter the phrase 'community cohesion' into an internet search engine you will find a range of definitions. However, we believe that the only true definition of this phrase is the one defined by the community it pertains to. Here is a selection of definitions provided by residents of Alderton Parish within their responses to the October 2014 Parish NDP Survey:

*The community has an identity - that people feel they 'belong', that everyone pulls together. NOT an anonymous collection of people who don't know each other and who just 'happen' to live there"*

*Sticking together with a common sense of purpose*

*A community speaking with one voice*

*A community working together, supporting each other, participating in community events are upholding everything that has made the place special*

*A good community spirit, a sense of belonging, where people live and work in harmony*

*Residents care for each other and involve themselves in and support village institutions such as the church, school and local businesses*

*Residents feel part of a supportive community, and consequently care about fellow residents, the local environment and the success of businesses and amenities within the community*

*Developing and maintaining a sense of identity and pride in the environment and community. This means managing growth in housing and facilities and the way that changes are made so as to be in keeping with the needs of the village and the views of its residents*

*All villagers working together and living in harmony, thus creating a village which is a joy to live in for all generations*

*It means all villagers joining in together without creating "them and us"*

## **Service Village Forum**

The Service Village Forum's membership is made up of Parish Council representatives of the twelve settlements identified as Service Villages in the emerging Joint Core Strategy. The forum is regularly attended by officers of

Tewkesbury Borough Council and an elected Borough Councillor at the invitation of the members. The Forum’s aims include the representation of the Service Villages and the support of those making formal development plans in our geographical area. The Service Village Forum is supported by the Gloucestershire Rural Community Council. It is a collaborative project addressing, in a tangible way, the ideals described by Government such as “Community Led Planning” and “the Big Society.”

The stated objectives of the forum are:

<p>1. Knowledge</p> <p>a. Keep each other up to date with each Service Village’s situation and actions.</p>
<p>2. Representation</p> <p>a. Give stronger messages to the Borough</p> <p>b. Give stronger messages to Joint Core Strategy</p>
<p>3. Neighbourhood Development Plans</p> <p>a. Share knowledge</p> <p>b. Share resources</p>
<p>4. Housing allocation</p> <p>a. Work together to identify an appropriate number of houses required in the Service Villages over the JCS period of 2011 to 2031</p> <p>b. Work together to allocate the identified number of houses within the Service Villages</p>
<p>5. Project Life</p> <p>a. Project to run until Joint Core Strategy is ratified.</p>

The Service Village Forum seeks to support those preparing formal plans. The formal plans fall into three categories being;

- The Joint Core Strategy
- Tewkesbury Borough Council Local Plan
- Neighbourhood Development Plans

### **The Joint Core Strategy (JCS)**

The JCS was prepared by Cheltenham, Gloucester and Tewkesbury Councils supported by Gloucestershire County Council. The Joint Core Strategy (JCS) is a key part of the development plan for the area. It is an important document because

it sets out the identified need and location for housing and employment, and supporting infrastructure, in our areas up to 2031. The planning system is 'plan-led' – this means that development proposals have to be in accordance with the policies and proposals of the development plan unless there are good planning reasons to set them aside. Without a Joint Core Strategy, therefore, we significantly increase the risk of being unable to prevent or control unplanned development.

The JCS was submitted to the Secretary of State in November 2014 and Spring 2015 sees the examination period.

Distribution of development is described in Policy SP2.

#### **Policy SP2: Distribution of New Development - Part 2**

Over the plan period to 2031, land will be provided for about 31,040 new homes and for about 64 hectares of employment land, to support about 28,000 new jobs.

- Gloucester and its urban extensions will accommodate about 11,820 new homes
- Cheltenham and its urban extensions will accommodate about 10,655 new homes
- Elsewhere within Tewkesbury Borough development will accommodate about 8,565 new homes. This will be met:
  - through strategic allocations at Ashchurch
  - through smaller scale development meeting local needs at
    - Tewkesbury town in accordance with its role as a market town,
    - and at rural service centres
    - and service villages.

#### **Policy SP2: Distribution of New Development - Part 4**

Rural service centres and service villages as identified in Table SP2c below will accommodate lower levels of development to be allocated through the Tewkesbury Borough Plan and Neighbourhood Plans, proportional 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. Over the plan period to 2031:

- The rural service centres will accommodate 1860 new homes, and
- The service villages will accommodate 752 new homes



## Tewkesbury Borough Council Local Plan

The Service Village Forum has participated in four key stages of the development of Tewkesbury Borough Council's Local Plan. The overall aspiration is to assist Tewkesbury Borough Council to prepare a plan which can be supported by each of the twelve Service Villages and is consistent with NDP's as they are produced, and is consistent with the JCS.

<b>Disaggregation</b>	<b>Qualitative Assessment</b>	<b>Site allocations</b>	<b>Influence &amp; Support TBC Local Plan</b>
<p>Evidence based allocation of 752 houses around the 12 Service Villages in accordance with the principles described in the NPPF and JCS being</p> <ul style="list-style-type: none"> <li>• Size</li> <li>• Function</li> <li>• Proximity &amp; Accessibility to Cheltenham and Gloucester</li> </ul>	<p>Examination of deliverability of the disaggregation allocations and identification of constraints to development.</p>	<p>Facilitate dialogue between Tewkesbury Borough Council and individual Service Villages in the identification of sites capable of delivering 752 houses in the period to 2031.</p>	<p>Offer pre-publication opinion and feedback concerning the content and presentation of Tewkesbury Borough Council's Local Plan.</p>

At the time of writing, these processes are nearing an end and it is hoped that TBC's first draft for public consultation will be published in February 2015. Work continues to fine tune the disaggregation calculations but the principles and bulk of the core data is complete. Taking core data Alderton is currently ranked as follows against each of the sub-headed categories.

Size – 7<sup>th</sup> out of 12

Function – 5<sup>th</sup> out of 12

Proximity – 10<sup>th</sup> out of 12

The weighting of each of the three sub-headed categories is still being debated but at the extremes of the spectrum, the allocation for Alderton is in the ranges between 40 and 48 for the period from 2011 to 2031.

### **Aldertons Transport Concerns**

The National Planning Policy Framework (NPPF) 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. Alderton's remote location means it is necessary to have an independent means of transport for work, leisure, health and many other forms of activity in the local area.

This is evidenced by the 2013 Alderton Parish Consultation Outcomes Report and is reinforced by the lack of a regular and frequent Public Transport Service. Although retired residents are supported by current bus services, services are very limited as evidenced by the Bus Timetables. The NPPF requirement is to build in places where it is possible to engage in cycling, walking and taking the bus to work and our concern is that this is not being met.

Thus the very nature of Alderton's location makes car ownership a necessity, but by the same token its residents actively choose to live there because of its relative separation from larger settlements.

All access routes in and out of the village are in the main single track roads. The new agreed development proposes parking for 103 cars. This development will add a further 130+ vehicles. This will significantly impact on the traffic flow through roads within the village which are narrow, along which many houses have no off-street parking, and the roads are generally restricted by parked cars.

However it is not just the impact on roads within the village that needs to be taken into consideration but also the knock on effect on the main roads outside the village such as the B4077, and the A46, coupled with the effect of other new developments within the area such as at Winchcombe our nearest small town. Both these aspects raise the question of Road Safety, particularly as the B4077 has been the scene of 2 fatal accidents in the last 12- 24 months.

In summary, the proposed new development will merely seek to increase the necessity for car travel and will have an impact on village roads that are ill-suited to cope with such an increase, particularly at the main access and egress points. This completely contradicts the sustainability principle of the NPPF.

### **Aldertons Employment Concerns**

Employment is key when determining if development is sustainable. Housing should be located where people can walk, cycle or use public transport to travel to work.

75% of Alderton residents commute to work, compared with 68.5% in Tewkesbury Borough and 57% in England.<sup>1</sup> This percentage would increase with the approved 47 additional households. This is contrary to NPPF intentions. Universal Jobmatch produces no current vacancies within a 5 mile radius, the nearest jobs are located in Tewkesbury, 8 miles distant, Cheltenham 12 miles and Gloucester 20 miles. NPPF states development should be planned to minimize journeys to employment, additional houses in Alderton conflicts with this, residents typically commute.

Many employment opportunities in Gloucestershire, full-time and part-time, require employees to be flexible and prepared to work evenings or weekend shifts. Large scale recruitment in the past six months has been predominantly in retail, hospitality and care sectors. These predominantly part-time jobs were not accessible to Alderton residents by public transport. Financial service sector is also increasingly employing staff on shifts including Capita, Endsleigh and LloydsTSB. Slow broadband speeds adversely impact upon home working.

Barriers created by lack of access to public transport to reach employment are exacerbated for young people; many cannot drive or afford to buy and run vehicles. Youth unemployment in Tewkesbury has only reduced by 3.8% between January 2013 and January 2014. In contrast, Gloucestershire's youth unemployment has reduced by 26%. Youth Contract is a government scheme introduced to help tackle this issue. Sector based work academies, part of the government's Youth Contract, offer training and work experience. Full-time attendance is required, but bus services are too infrequent to enable Alderton people to attend these in Gloucester, Cheltenham or Tewkesbury. Tewkesbury Local Authority also has the highest proportion of young people (4.9%) not in Education, Employment or Training in Gloucestershire. <sup>2</sup>

There is no strategic policy to deliver new jobs near Alderton. The proposal is not for sustainable development, making it easier for jobs to be created, increase prosperity or improving quality of people's lives. Neither is it a rural exception site to accommodate current residents with existing employment connections.

NPPF directs that Local Authority strategy for housing and employment is integrated; allowing property developers to determine housing locations does not permit this required integration.

## **Aldertons Housing Concerns**

A key argument for this development is that Tewkesbury Borough Council cannot demonstrate a 5 year land supply and that puts them in breach of their statutory requirement. The question becomes to whom is there material harm because of this

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<sup>1</sup> National Office of Statistics

<sup>2</sup> Gloucestershire County Council January 2014

breach? Primarily the local residents themselves with quality of life issues, then the building industry as a stakeholder in the planning system and then those people who are unable to house themselves.

In Tewkesbury Borough Councils local plan (3), the Council recognised the difficulty faced by families living on low incomes in rural areas. They proposed sites should be small in size, located in or adjoining villages and where there were adequate local facilities. This proposed development provides 35% of affordable housing which significantly exceeds local requirements within Alderton. The approved development of 47 houses and the 15 affordable homes this contains exceeded our own survey of affordable housing needs in 2010 (4).

By solving the issue of a lack of land supply we are creating another; building houses for those in need of housing is important, but just as important is building houses where people can sustain themselves through the local services and infrastructure. Making up the required numbers in a sustainable location has to be a preferred solution than the decision to build affordable houses in unsustainable locations.

### **Local Schooling**

The Governing Body has considered this planning proposal and, on their behalf, I would comment also as follows:

1. Numbers on Roll (NOR) – the facts at the moment are that we have 105 total places and 86 NOR so spare capacity of 19. There are 10.75 children forecast from the approved development at Beckford Road which we still think is too low. We do not understand how we can be predicted a possible fall in roll in the next few years whereas in fact The National Pupil Projection Numbers forecast a rise in school population between 2015 and 2020 of 9%. Should this occur then Oak Hill could not cope with the increase in it's population that the new proposed development East of St Margaret's Drive would create.

Presently, in some year groups we are full i.e. 15 or more in a year group. The projected increase in pupil numbers cannot forecast the year group these children will fall into and whilst in some cases it may prove beneficial to the school, it may also be detrimental in presenting unmanageable problems in maintaining equilibrium in class sizes and teaching groups. No doubt the latter would cause uproar from parents.

2. We have no capacity to extend our existing school buildings, either in Dumbleton or Alderton (remember that infants are in Dumbleton and Juniors in Alderton). Accordingly, extra monies are of no use unless they are sufficient to sustain a manageable and quality education and enable school buildings to be

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<sup>3</sup> Tewkesbury Borough Local Plan to 2011 - Affordable Housing Policy HOU14.

<sup>4</sup> Alderton Parish Housing Needs Survey April 2010

rebuilt/relocated which is very clearly not desirable as the threat would be to build a new school and the likelihood is that Dumbleton and/or Alderton would lose its school and the character and history of our rural faith school would be lost forever.

3. Furthermore, the prospect of section 106 monies may be seen as a “fix all” solution, whereby “**one off**” finance is made available as a means of solving the problem. However, the two sites of Oak Hill School do not lend themselves to material development in a temporary or permanent form. Space is extremely limited and would deny pupils active recreation space for out of class activities and breaks.

The s106 monies offered may well pay for additional staffing but there is no capacity to enable separate classes to be taught, particularly at Dumbleton. It is highly unlikely the school funding formula for subsequent years would sustain the subsequent financial shortfall. In short, the s106 money would be a "quick fix".

Accordingly, and as mentioned previously, development on the scale planned is a real threat to the school as it could not accommodate all the forecast children. We would be averse to a sudden influx of pupils that may serve to disrupt the efficient means of management already in place, detracting from the environment which presently makes parents feel their children are part of a caring and unique school.

## **The Visual Impact.**

Local Planning Authorities reason for refusal

*The proposal, by virtue of its prominent open location to the south of Alderton would represent a significant encroachment into the surrounding rural landscape. This encroachment would have a harmful impact upon the character and appearance of the landscape within a Special Landscape Area which serves to protect the foreground setting of the nearby Area of Outstanding Natural Beauty. Furthermore, the proposed addition of up to 60 dwellings would be of a scale disproportionate to the existing settlement that would fail to maintain or enhance the vitality of Alderton which would have a harmful impact on the social wellbeing of the local community. The proposal therefore does not represent sustainable development within the context of paragraph 14 of the NPPF and the identified harms would significantly and demonstrably outweigh the benefits of the proposal. The proposed development is therefore contrary to the core principles of land-use planning set out at paragraph 17 of the NPPF, sections 6 (Delivering a wide choice of high quality homes), 8 (Promoting healthy communities) and 11 (Conserving and enhancing the natural environment) of the NPPF, policy LND2 of the Tewkesbury Borough Local Plan to 2011 - March 2006 and emerging policies SD2 and SD7 of the Pre-Submission Joint Core Strategy (April 2014).*

Alderton parish are concerned about the visual impact this development will have on the Alderton rural landscape. For a number of reasons:

1. The huge visual impact this proposed development would have on the beautiful, charming village of Alderton.
2. The opinion of the majority of the residents of the village in a recent survey stating that 84% wish “to protect and enhance the special landscape of Alderton Parish, its extensive open views, natural beauty and biodiversity.” The view that was most important to the locals according to the survey is that from the B4077 to the southern flank of the village with attractive grouping of houses around the Church, which includes listed thatched cottages.
3. Description of this view. The fact that the B4077 is the gateway to the Cotswolds and was a Turnpike from 1726 to 1872. Thus travellers have enjoyed the view of the ancient Church for many centuries .The view would be completely obliterated by the proposed development. Alderton, would therefore, lose its landmarks and as a result its identity.
4. The above survey also stated that villagers also treasured the view from Church Road towards The Great Western Railway line with it’s steam engine nestled in the valley below Langley Hill.
5. The disproportionate scale of this development and high-density housing will definitely impact on the visual character of the village and will look like a housing estate bolted on to an historical village. It would have a negative impact.

### **Tewkesbury Borough Landscape and Visual Sensitivity Study**

Tewkesbury Borough Council commissioned Toby Jones Associates Ltd in September 2014 to evaluate all land surrounding rural service centres and service villages as identified in the Joint Core Strategy in terms of landscape and visual sensitivity to residential development.

This study identifies issues and sensitivities that should be taken in to account when considering new development around the Rural Service Centres and Service Villages. Whilst the primary focus is that of residential development, the findings can equally inform decisions about other types of development.

This report forms part of a wider evidence base that will ultimately inform the identification of the most suitable sites for new development through the Tewkesbury Borough Plan. This report provides an evaluation of landscape and visual sensitivity; it does not seek to make a definitive judgement on the suitability of sites for development.

A package of studies and considerations, including infrastructure capacity, ecology, townscape sensitivity, heritage, flood risk and other detail site constraints, all need to

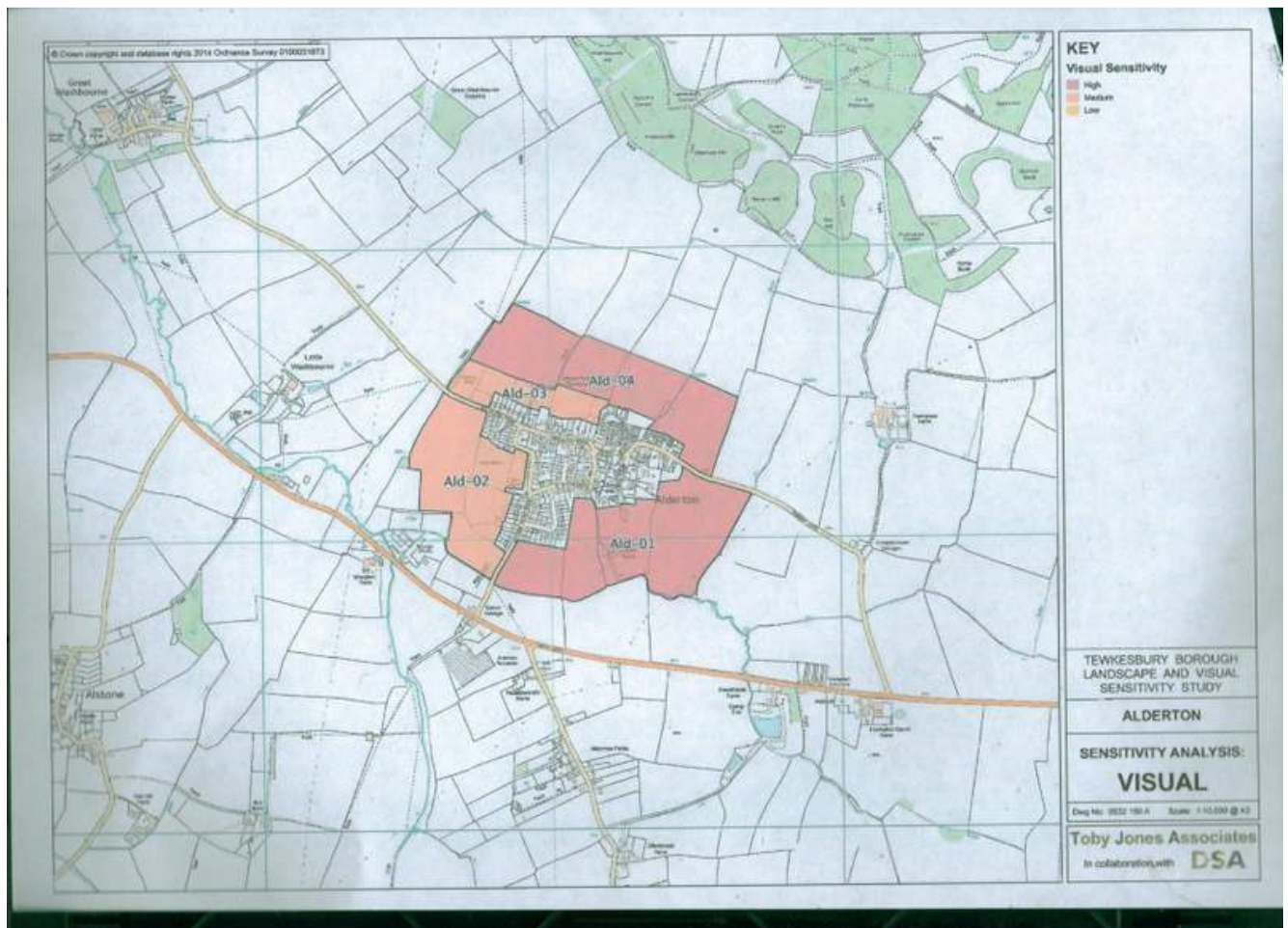
be weighed up in selecting appropriate sites. This suite of evidence base studies will inform an understanding of the capacity and suitability for development as opposed to the sensitivity considered in this report.

### **Alderton within this report**

Alderton sits at the base of Dumbleton Hill at the very edge of the AONB. Key sensitivities include the openness of these lower slopes and their role in creating the setting for the AONB. The sense of separation between Alderton and the B4077 is characteristic and vulnerable to insensitive development.

There is also a sensitivity around development that does not respect the generally clustered settlement form and that might appear conspicuous and prominent in the vale.

From this report the site sits within the land parcel Ald01 and is recorded as **high visual sensitivity**.



Visual Summary from this report concluded:

This is a prominent land assessment parcel exposed to the B4077 and the large number of people passing along it. The landform clearly rises from the road to the

village edge and provides a distinctive visual setting to the village and the AONB beyond. Much of the settlement edge is 20th century.

The key sensitivity here is the preservation of views to the historic village core and church from the south and east and to protect the visual relationship between the historic village core and the slopes down to the stream and the visual link to the B4077.

Development on this parcel could bring about a notable change in the settlement pattern and its relationship with the surrounding countryside.

Development within this parcel might cause the loss of established views of the Church and historic settlement edge.

### **Proportionality, Timing, and Village Cohesion**

Through definitions of social cohesion identified pertinent to this scenario, we will demonstrate that the harm the development will cause will outweigh the benefits. The negative impact on social cohesion within the community of Alderton that the proposed scale of development would have and which would render this development unsustainable in terms of the principles of the NPPF.

The question of Proportionality and timing are pertinent factors which need to be taken into consideration when assessing development of this scale, in such a small, compact environment as Alderton Village. The developers referred to it in their planning application.

Freeman Development stated in supporting the planning application in paragraph 7.48 of the Planning Statement that the proposal was considered to be the optimum amount of new houses to be delivered within Alderton. In paragraph 7.49 it was asserted that the site represented an opportunity to deliver enough housing in Alderton to meet the needs of the village for the next 20 years in a location which results in the least impact upon the character of the village.

#### ***This was before the Charles Church development was approved.***

Furthermore proportionality is discussed within the Service Village Forum who unanimously agreed that the JCS offers a balanced and proportionate view of development in the Service Villages. 752 houses in 12 villages over 20 years is on average 3 houses per village per year. The Service Village Forum encouraged individual communities to support the JCS at consultation.

The Tewkesbury Borough Council local and Alderton NDP plans are well developed. The Service Village Forum and local plans will be published for consultation during this appeal hearing's deliberations. These emerging plans will indicate that Alderton's allocation of houses will be in the region of 40 to 48 houses for the period



ending 2031 of which 47 have already been committed. The emerging plans will identify suitable and deliverable sites to fulfil the Objectively Assessed Need.

This current site is not considered suitable and a better site will be proposed to the west of the village of Alderton.

To approve further permissions at this time would render the emerging community led plans stillborn. The plans and community wishes would be thwarted both in terms of practical delivery of best outcomes but moreover in terms of crushing morale and motivation in what has so far been an exemplary example of responsive and responsible democracy.

We feel that a brief few months be given in which the local plans can be published in order that its conclusions and supporting evidence base can best inform the appeal decision. Not to wait risks making irreversible damage to our communities aspirations and to the hearts and minds which have worked so hard to make them a reality.

## **Conclusion**

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”.

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.”

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, TBC Local Plan, and NDP’s, 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,
- Protecting our communities, infrastructure and heritage against inappropriate and disproportionate opportunistic development.

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 in to allow the community to absorb additional residents on a sustainable basis and allow it to retain its well established community ethos.

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.

## A few quotes to ponder.

### House of Commons *Monday 18 March 2013*

**Sir Bob Russell (Colchester) (LD):** Is the Minister concerned about **urban creep into rural areas destroying the open countryside** within urban fringe fields and between towns and **adjoining villages**?

**Nick Boles:** I would be concerned if that were happening, but it is not and so I am not concerned.

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Speaking to the Sunday Times, Simon Jenkins said: 'He (**Mr Cameron**) pledged there that he would no more put the countryside at risk than his own family.'

.....

Written ministerial statement by Nick Boles on local planning.

The coalition government is committed to reforming the planning system to make it simpler, clearer and easier for people to use, **allowing local communities to shape where development should and should not go**. Planning should not be the exclusive preserve of lawyers, developers or town hall officials.

We are also committed to ensuring that countryside and environmental protections continue to be safeguarded, and devolving power down not just to local councils, but **also down to neighbourhoods and local residents**.