

18 December 2017

Tel: 01242 602173

Miss Lisa Dixon
Tewkesbury Borough Council
Council Offices, Gloucester Road
Tewkesbury, Gloucestershire GL20 5TT

Dear Miss Dixon

Application Reference 17/00514/OUT

Outline application for residential development of 60 units.

Bell House Farm Old Road Maisemore Gloucester Gloucestershire GL2 8HT

The Campaign to Protect Rural England (CPRE) objects strongly to this speculative planning application for the reasons set out below.

We are concerned, however, that the application appears to have been submitted to Tewkesbury Borough Council last May but has taken nearly six months to be validated, for reasons which are not explained. Moreover it has not been accompanied by a Design and Access Statement: the planning statement supplied does not adequately include all the required information.

The Site and its Surroundings

This is a green field site in a rural locality and lies outside the settlement boundary. The site is very much a part of the wider rural landscape, as opposed to an adjunct to the village.

The Planning Context – the Joint Core Strategy (JCS) and Tewkesbury Local Plan

The NPPF (para 2) makes it clear that applications for development must be determined in accordance with the development plan, unless material considerations indicate otherwise.

The only extant development plan is the Tewkesbury Borough Local Plan to 2011. Although now out of date, a number of Plan policies have been ‘saved’ pending a successor plan. The present site is not allocated for development in the Plan.

The emerging local plans comprise the JCS and a new Tewkesbury Local Plan, which is subordinate to it. After a long period in preparation, in October 2017 the JCS at last completed its Examination in public and all three constituent Councils have since accepted the modifications proposed by the Inspector. The JCS therefore, as modified, can now be regarded as the definitive strategic plan applying to Tewkesbury Borough.

It is worth noting that in her Final Report (para 279), the examining Inspector writes:

“... it is in the public interest to have an adopted Plan in place as soon as possible to reduce continuing ad-hoc, unplanned development”.

The current application constitutes just such an ad hoc, unplanned development.

The JCS housing allocation to rural areas within Tewkesbury Borough (Policy SP2) is limited to two ‘Rural Service Centres’ and 12 ‘Service Villages’, of which Maisemore is one. 880 dwellings are to be spread across the Service Villages but of this figure almost all have already either been completed or committed. Given existing commitments within Maisemore, the settlement does not require a further development on this scale.

Although the way is now open for it to progress, the new Tewkesbury Local Plan is still at a very early stage and therefore carries little weight in its present form. It is, however, worth noting that the most recent ‘Draft Policies and Site Options’, which was subject to public consultation in

2015, included potential housing site options for the JCS 'Service Villages'. At Maisemore, two sites were put forward (one of which has since received development permission). The site of the present application was not one of them.

Housing Land Supply

Contrary to the claims made by the applicant, Tewkesbury Borough is now able to demonstrate a five year housing land supply, as is made clear in the JCS Inspector's Final Report. The matter of whether the housing requirements are soundly based and whether sufficient provision is made for the supply of housing is covered in paras 39 – 112. In particular, para 97 states:

"Gloucester can demonstrate at least 5.8 years of housing land supply, Cheltenham 6.00 years and Tewkesbury 5.3 years. However, by the time of adoption, it is estimated that Tewkesbury's supply will have risen to 6.3 years with a 20% buffer applied. Given Tewkesbury's strong delivery record to date during the early Plan period, this buffer could drop to 5% in the future, rendering the 5 years supply even greater."

This clearly demonstrates that there is no basis for the provision of the housing proposed in this application for lack of available housing land in Tewkesbury Borough.

Landscape Impact

As already observed above, the application site is very much a part of the wider rural landscape, as opposed to an adjunct to the village. It is an attractive landscape with expansive unspoilt views. We cannot improve on the opinion of the Borough's own Urban Design Officer who, in her response to the application, states:

"Due to the open nature of this site it relates more with the surrounding open countryside than it does with the built up part of the village. Due to the open rural nature of the site it is not felt that this is an appropriate location for any development. It would represent an unnecessary intrusion into open countryside and would not integrate well with the existing settlement."

"The proposed layout fails to address the openness of the site or the relationship with the open countryside by presenting a hard boundary of back gardens to the north on the most sensitive boundary of the site. The illustrative masterplan also shows quite a dense development in comparison with most of the village, there are several 2.5 storey terraced units and most of the units are small and set in small plots. This is out of character in this sensitive edge of settlement location, the grain and density of development would be more characteristic of suburban development within a town or city."

"This proposal fails to respect the context and character of the area and is therefore contrary to policy SD5 of the emerging JCS, which requires development to respond positively to and respect the character of the site and its surroundings. It is therefore also contrary to policies in the NPPF requiring food design and sustainable development."

At present, however, there is an important omission in that the Borough Landscape Officer has yet to comment on the application. We may wish to comment further once these comments are available.

Conclusion

For all the reasons set out above, the proposals are unsubstantiated and unsustainable. We therefore request the Council to refuse this application.

CPRE recommends that the Council declines to determine the application until the applicants have submitted a proper Design and Access Statement.

Yours sincerely

Tom Hancock

Major Tom Hancock DL

Chairman, CPRE Cheltenham, Gloucester and Tewkesbury District

Chairman:

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The Campaign to Protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

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