



Lassington Oak

Highnam Parish Council

Highnam ~ Linton ~ Over ~ Lassington



Chairman – Michael Welch

Clerk – Richard Hicks

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11 May 2021

Without Prejudice

Dear Tracey Ford,

Consultation Initiative Relating to Land adjoining Highnam Business Park and to the West of Lassington Reach, Highnam

We refer to your letter and attachments dated 23 April and would thank you for the courtesy of providing Highnam Parish Council with early notice of your proposed local consultation. As Clerk to Highnam Parish Council I am authorised to set out this Council's position with regard to your development proposals. The Parish Council has given this matter due consideration, but will continue to reserve its position should further material issues come to light which may cause us to reconsider matters. We would also stress this response is entirely without prejudice to any further representations we may wish to make either at Outline or Reserved Matters planning application stages or at subsequent appeal, in the event of planning refusal.

Despite the assurances you have previously given that you would be willing to work alongside and at the pace of this Parish Council in developing its new Neighbourhood Development Plan (NDP) we are disappointed you have since decided to bring forward your consultation at this time. We have very recently concluded our own Plan survey amongst residents, the results of which we will be analysing very shortly. Our next step is to initiate a local Call for Sites which would enable all landowners and development partners to put forward sites for development. In conjunction with Tewkesbury Borough Council, with whom we are in regular dialogue, we will critically evaluate these to form a judgment in relation to their respective merits or otherwise. Your initiative is, therefore, premature, and we would ask you to reconsider your timetable to enable these important stages to be concluded. We would encourage you to recognise that aligning your plans with our timeframe for NDP adoption is the most sensible approach.

We note also that you have decided to confine your consultation solely to those nearest the site. Given the strategic nature and scale of your proposals and their potential to have a wider impact on the whole community we would urge you to expand this to enable all residents of the Parish full opportunity to express their views in this matter. We intend to publicise our response to all parishioners, not only so they are aware of this proposal but also to enable those who wish to do so full opportunity to advise you of their views having regard to this Parish Council's own position. As you are required to submit a Statement of Community Involvement to accompany any planning application, we feel sure you would

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wish to ensure the whole community has had the chance to express its opinions. We are concerned also that the questionnaire attached to your Consultation is rather brief and comprises primarily closed questions which appear designed to restrict in depth detailed responses.

Turning to the specifics of your proposals, and on a positive note, we can say we are not in principle opposed to the concept of an expansion of Highnam Business Park. This accords with Policy B1 of our approved NDP. We were pleased to note you have dropped the proposal for a direct access from this site onto the B4215, but this expansion will bring with it a need to improve Two Mile Lane, specifically that length from its junction with the B4215 to the Highnam Park entrance, but also along its whole length down to the A40 junction. Whilst appreciating this is an outline proposal only at this stage, we would welcome further information in relation to the proposed number of additional units, and whether these will be office, retail or general business uses. We are concerned that your consultation document has little by way of detail regarding your proposals. This is a sensitive site and even at this stage we would expect to see more detail of landscape, layout planning, and unit's specifics/descriptions. We are therefore unable to make any substantive comments at this stage and reserve our observations until your more detailed proposals are forthcoming.

With regard to the residential scheme to the north of the B4215, we were particularly disappointed in its concept and vision, especially as we had hoped for something more imaginative following our earlier discussions with your colleague, Matt Regan. Turning to our more specific comments, these are set out below:

First, our NDP vision is to retain an integrated, cohesive community. Your proposal lacks that essential ingredient of some form of direct internal link with the rest of the village. Your scheme requires access onto and off the B4215 to achieve this, with all the attendant traffic safety concerns this would cause. The chance to have provided this rests squarely with the landowner who had this opportunity within his gift when the adjoining Lassington Reach development was undertaken. The fact he did not approach this strategically is not of our making. We understand there may be legal issues here for you to resolve, but the challenge to positively address them rests with you.

Second, our concerns above go to the heart of this matter - a lack of strategic master planning. This proposal, an additional self-contained, separate block of residential development with stark boundaries and with no intrinsic links to the rest of the village other than some pedestrian and cycle way provision, is not the way to achieve this. We feel sure you will appreciate our concerns; a first phase of development has only recently been completed at Lassington Reach on land sold by the landowner of this site, and now another block is proposed. The risk, as we see it, is of a continuing stream of completely discrete self-contained developments taking place, none of them having any relationship with each other, each with their own separate vehicular access onto the B4215. This would be planning at its worst and we are determined to ensure this does not happen.

Third, we are totally opposed to an additional vehicular access onto the B4215 at the point you propose. This would make six separate accesses along a 400m stretch of road on a bend with existing poor visibility. This will create obvious and concerning adverse road safety implications. The solution, should you decide to continue to pursue this scheme, is the construction of an appropriately sized and designed roundabout at the junction of the B4215 with Two Mile Lane. This would also provide access to Rodway Hill Golf Club and to your proposed residential site. You may argue that this is now not commercially viable within the context of your two schemes, but this could have been fundable had the landowner had the foresight to look at this strategically when the Lassington Reach development was undertaken and when the original Business Park and Golf Club were established. Given the uplift in land values arising from all these schemes this could paint a different picture in terms of its commercial viability.

Fourth, you have, quite properly, referred to the making of Sec 106 and CIL infrastructure contributions and this is to be welcomed. We would ask for early without prejudice discussions with you regarding their scale, scope and broad outline as we feel opportunity presents itself to promote a more integrated scheme. This might, for example, provide the framework for recreational/sports facilities to be developed on adjoining land. In a wider context we would draw your attention to a current deficiency in school place provision at the Highnam Academy Primary school, and an under capacity at the Doctors' Surgery even to serve the existing community, which this development will only serve to exacerbate. These issues also need to be constructively addressed.

Fifth, linked to the overall transport picture in the village and the comments above ref S106 and CIL, there is also a key need to look at a step change in transport provision and accessibility as a result of this development which has not been considered fully. The cumulative impact of the Lassington Reach development, infill development, and this latest application, must be considered not only from traffic generation terms but from a wider mode shift and accessibility perspective which needs to be properly developed in terms of any application.

Not only is there a need to ensure public and community transport connectivity to and from key locations such as Gloucester and Newent, but also the access needs to Highnam Business Park which is fundamentally car dependent. With the dual residential and commercial aspects of this latest proposal there is a key opportunity to achieve enhanced accessibility in several ways, and to use Section 106 contributions not only to mitigate transport impact of the development itself, but to assist in the using of 'background' traffic levels to reduce pressure on the local road network - and in particular the Highnam - Over stretch of the A40.

Thinking strategically, the recent A40 improvements need to maintain as long a 'shelf life' as possible, so anything that can be done now to afford greater mode shift to and from Highnam will also assist Highways England and Gloucestershire County Council in meeting that objective.

Specifically the opportunities that should arise would include:

- Creation of further improved waiting facilities to support both public bus and community transport vehicles – including accessibility and real time passenger information provision.
- Enhanced frequencies of public bus services working in partnership with commercial providers and Gloucestershire County Council.
- Development of a step change in accessibility to employment locations, colleges, healthcare etc. through creative solutions with local Community Transport providers such as Community Connexions, Newent Community Transport, Lydney Dial A Ride and Forest Community Transport This is fully in line with Gloucestershire County Council's objectives on expansion of community transport to cover 'all age' and wider access issues.
- Enhancements to public transport stop/waiting areas to serve Highnam Business centre.
- Strategic improvements to local footways/footpaths.
- Strategic engagement to the Highnam – Over cycle route to make it a route of choice.
- Further enhancements to public rights of way in the vicinity, encouraging more active travel and access to the open countryside for residents.
- Use of the residential and workplace travel plan tools not only for the new development but retrofitted onto the Lassington Reach development and the existing Highnam Business Centre to maximise viability of sustainable transport

alternatives. Going beyond the 'red line' of the application site in terms of traffic reduction is a legitimate approach in the light of NPPF and strategic highway guidance, and provides an important valve mechanism for the B4215 and its relationship with the A40.

Clearly, our comments at this stage can only relate to the strategic dimension of your proposals. In conclusion, there are aspects of your proposal, the Business Park expansion, which we would be happy to continue to work with you to bring to fruition. The residential scheme, however, requires a great deal more thought and is not something we are prepared to give in principle support to at this stage.

A copy of this letter will be sent to Tewkesbury Borough Council Planning Officer, and we are seeking an early meeting with Tewkesbury Borough Council to set out our position more fully. We would genuinely hope that on reflection you will be prepared to modify your proposals to accommodate what we trust are our constructive observations. Our Planning Group remain available to meet or communicate with you and your team at any time, and in this respect your principal point of contact is Cllr Coats.

Yours sincerely,

Richard Hicks
Clerk/RFO
Highnam Parish Council