

Highnam Parish Council

Highnam ~ Linton ~ Over ~ Lassington



Chairman – Charlie Coats

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Dear Ms Stone,

Land North and South of B4215 Highnam. Planning Application reference: 21/01392/OUT

This letter constitutes Highnam Parish Council's formal response to the above referenced planning application.

Before dealing in detail with the various aspects of the application we would make the following general comments, namely:

First, as this application covers two distinct sites, we will comment on them separately except where there are common issues relevant to both.

Second, the applicant's Statement of Community Involvement (CLI) states there has been extensive consultation with Highnam residents. This was not the case: the consultation was extremely limited and confined primarily to those properties within the immediate vicinity of the sites. For a development of this size, which will impact on the whole community, we would have expected the consultation to have covered all households. This is a major deficiency and demonstrates that the views of the village as a whole have yet to be properly sought.

Third, whilst it is correct to say the views of the Parish Council were sought, it is highly regrettable that these have been almost totally ignored in the compilation of this proposal.

Fourth, the applicants make extensive reference to the Joint Core Strategy, the emerging Tewkesbury Local Plan, and the issue of a five-year housing land supply. We make no comment on these major strategic documents as we would expect and will rely upon the Borough Council to adequately and robustly deal with the extent to which they this application does or does not comply with them on their and our behalf. We are aware though that the Borough Council will now say they are able to demonstrate the availability of a five-year housing supply. If that is the case, it would appear to fundamentally undermine the principal plank of the applicant's case, and we would expect this to be a major argument in favor of this application being rejected.

Fifth, Clauses 8.10 – 8.13 of the applicant's Planning and Affordable Housing Statement extensively refers to the Parish Council's emerging Neighbourhood Development Plan (NDP) as evidence of compliance with the aspirations of the local community. This is most certainly and emphatically not the case. Whilst policies are emerging, the Parish Council is currently a very long e-mail highnampc@highnamband.co.uk www.highnampc.org.uk

way off having any sort of definitive new Plan anywhere near ready for adoption, indeed, we still have several major stages to work through before we reach that position. We must strongly request, therefore, that no reliance be placed on our draft ideas, and that this whole section of the applicant's Statement be ignored. The made 2017 Highnam NDP at present remains our sole and definitive statutory Plan and currently represents the stated position of the Parish Council.

Last, we note the detailed work presented in relation to flood mitigation measures and assessments. Given the scale of development proposed encompassing both sites we are very concerned about the potential for extensive downstream flooding. We have been in communication with Minsterworth Parish Council about this and are aware they are likely to be registering their concerns about the potential for flooding arising from this development to seriously and adversely affect their community. We would urge you to commission detailed studies to critically address this concern.

Turning to the constituent parts of the application:

Land to the east of and adjoining the existing Highnam Business Park promoted for additional commercial development.

Objective B1 (Business and Enterprise) of the made 2017 Highnam NDP states: *"Proposals to extend Highnam Business Park up to around twice its current size will be supported."* Whilst we are in principle prepared to support some additional compatible development in this locality, we were concerned to note the proposed site extends to over double the size of the existing Business Park. This represents in our opinion over development, and we would expect to see the scale of this reduced commensurately to comply with the provisions of the made NDP i.e. halving it in size.

Whilst we appreciate this application is in outline only, we would seriously question the need for the provision of additional office type accommodation at a time when many employers and businesses are substantially scaling back their office estates due to the impact of the Covid pandemic and the increasing and likely permanent move towards greater working from home. We are aware of large tracts of office accommodation falling vacant within the county, so before additional space is built, we would imagine any businesses seeking additional office accommodation would source this from within any existing provision. We would expect, therefore, the applicants to provide definitive evidence of demand and need for this type of space before this application is determined.

As access provision is not reserved in this application, we would express our concerns regarding the inadequacy of that section of Two-Mile Lane which runs from the existing access to the Business Park to its junction with the B4215. Given the potential for a doubling, or more, of traffic using this section of road we would expect to see it widened and improved to ensure acceptable levels of visibility and traffic management safety are in place. N.B. We comment in more detail about the junction of this road with the B4215 later in this response.

We note from the illustrative landscaping sketches provided that only a very narrow landscaping strip is provided to the eastern boundary of the site. Whilst appreciating this would be dealt with as a reserved matter, we must express concerns at this stage about the inadequacy of this provision as there is a compelling need to ensure the views and integrity of Highnam Court and the Church of the Holy Innocents to the east are not compromised in any way.

Land north of the B4215

We really are extremely disappointed with this proposal; it represents town and country planning at its very worst and totally lacks any sense of concept or vision. We oppose it in the very strongest possible terms; it has absolutely no merit whatsoever, and represents in our opinion a cynical attempt to exploit what the applicants perceive to be a weakness in the Borough's five-year housing land supply. There is simply no justification for it, and we summarise below our extensive objections to this scheme.

Our principal concern is a total lack of any form of strategic master planning. This proposal, an additional self-contained, separate block of indeterminate quality residential development with stark boundaries and with no intrinsic link to the existing community other than some indirect pedestrian and cycleway provision, is not the way to achieve this. The relatively recently completed adjoining Lassington Reach development at least had the virtue of vehicular linkage to Lassington Lane and the hub of the community, which this scheme lacks.

We are concerned also that this proposal could represent potentially creeping development: first, Lassington Reach completed within the last two years, now this application. We fear this could well be followed once this site is built out with additional tranches of similar sized development, each with separate vehicular access onto the B4215, until the whole of the field up to Rodway Lodge is built out. If that were to be the case, each development in itself being insufficient to warrant comprehensive infrastructure provision, it would create ghettos of unsustainable, disconnected housing which would destroy the carefully built-up community character of the village. We note from the illustrative drawings accompanying the application that no provision has been made to provide any form of vehicular link into additional tranches of development, indeed, landscaping around the site would appear to frustrate this. Without prejudice to our objection to this application, if the applicants do harbour any aspirations for additional future development it would be as well to flush this out now and require a comprehensive masterplan for the site to be prepared. The precedent for this, of course, was the failure by the same landowner to reserve a vehicular access from Mimosa Avenue on Lassington Reach onto this site. If that had been provided it would have at the least created a direct vehicular link to the existing village. We would question why this was not considered at the time Lassington Reach was constructed, and failure to do so demonstrates a complete lack of strategic thinking and master planning by the landowner.

As a Service Village, designated under the Tewkesbury Local Plan, Highnam was only required to accommodate an additional 130 houses, 88 of which have already been built at Lassington Reach, thereby leaving a balance of @ 42, much of which could be provided by judicious small scale infill development across the broader parish over the plan period. This proposal greatly exceeds this and should be rejected on these grounds.

The 2018 Housing Needs survey undertaken by the Gloucestershire Rural Community Council identified a need for 12 affordable housing units within the village, all of which could be provided within other small scale developments over the plan period, and commensurate with the provision of up to an additional 42 dwellings. This application would provide 36 such units, including four and five bed dwellings, surely a contradiction in terms, greatly in excess of demonstrable need.

We appreciate that at this stage neither CIL nor Sec 106 negotiations will have been entered into, but we consider it germane to mention that there is currently a deficiency in school place provision at the village primary school and at the doctors' surgery sufficient even to serve the existing community which this development would only exacerbate.

Our greatest concern is the proposal for a vehicular access onto the B4215 at the very worst possible location, the outside of a blind bend with limited visibility westwards. This has become a busy arterial road taking an increasing volume of freight and traffic from recent housing development at Newent and beyond. This would create six separate access points within a 500m stretch of road on a dangerous bend with obvious and concerning adverse road safety implications. Residents living in this new development would have to use the short length of the B4215 up to Lassington Lane to take children to the Primary School, visit the Village Shop and Post office and to visit friends, thereby significantly exacerbating traffic congestion and introducing safety hazards at this location.

Entirely without prejudice to our opposition to this application, the only realistic solution to ensure effective road safety and speed control in this vicinity would have been to construct a roundabout at the junction of the B4215 with Two Mile Lane. The same landowner has, in recent years, promoted the construction of the first phase of the Highnam Business Park, established the Rodway Hill Golf Club, built Lassington Reach, and is now proposing two additional significant traffic generators. Effective master planning and foresight would have anticipated this and would have provided a safe integrated and properly controlled traffic managed solution.

From a broader strategic highways perspective, we are concerned that additional traffic generated by these schemes, when added to the increasing volume of traffic from recent housing developments westwards at Newent and into the Forest of Dean, will greatly add to the current levels of congestion experienced along the A40 dual carriageway between the Highnam and Over roundabouts. This is already a major traffic bottleneck. We would urge the Borough to work with Gloucestershire County Council as highways authority to positively address these concerns before these applications are determined.

We feel sure our concerns will become apparent to your planning committee members on undertaking a site inspection, and we would request the right of attendance at such once arranged. In similar vein, we would formally request the right to speak to this application at planning committee to ensure our concerns are fully and properly registered.

In conclusion, Highnam Parish Council is not opposed to the principle of an expansion of the Business Park providing this is scaled back to comply with the provisions of our made NDP. We are though implacably opposed to the proposed residential development north of the B4215; it has no intrinsic merit, and we would strongly urge you to reject it.

Yours faithfully

C Coates

CLLr Charlie Coats
Chair: Highnam Parish Council