

Highnam Parish Council

Shaping the Future

Key Issues Statement

Response to Three Council Strategic and Local Plan Consultation Initiative March 2024

This Statement from Highnam Parish Council (the Council) reflects and comments in detail on the key issues likely to impact on the parish of Highnam in terms of possible future development and which need to be accorded due weight and importance in the preparation of the new Strategic and Local Plan. It focuses on broad concerns and issues which either need to be addressed well before any specific sites are allocated for development or which will fundamentally constrain further development within the parish.

Character: Highnam is a medium sized village with a current population of @2,200. It grew to its current size following major development in the early 1980's. More recently, an 88 house development at Lassington Reach has been built. A planning appeal in 2023 has allowed a further 95 house development immediately to the west of the village off the B4215 road plus an expansion of the Highnam Business Park. Once built this will increase the population to @ 2,500 people. A community can only expand so much before intrinsic features such as social cohesion, infrastructure fabric and scale which residents cherish and identify with are either compromised or are at risk of being destroyed. The Council consider that social cohesion has already been severely compromised following the construction of the 88 house development and the proposed additional 95 house development will exacerbate this further. The village should not expand further.

Highway Infrastructure: The road network serving and passing through the village is already beyond saturation point. The B 4215 is, for all intents and purposes, now a major arterial trunk road taking heavy duty vehicles and traffic off the M50 through to Gloucester and beyond. Major new development "upstream" at Newent exacerbates this. During morning peak periods, indeed at other times as well, this backs up past the Rodway Hill Golf Course entrance as it makes its way to join the major bottleneck of the A40 section of road between the Highnam and Over Roundabouts. This also creates road safety concerns, adversely affected also by excessive speeding along this section of road.

The narrow Two Mile Lane is increasingly being used as a main access thoroughfare between the B4215 and the A40, taking far more traffic than it was ever designed to do.

Heavy morning traffic congestion causing long delays and additional pollution is also experienced along the A 40 and the A48 roads, compounded by additional development across the Forest of Dean, all funnelling on to the same section of dual carriageway between Highnam and Over roundabouts.

Additional development within the parish, indeed as suggested also at Minsterworth and beyond, will severely add to an already untenable, intolerable situation. Before any appreciable additional development in this locality can be seriously contemplated a major strategic master plan feasibility study would be required. Significant upgrades and

improvements to the local road network would be essential including, it is suggested, a new River Severn crossing at a suitable location between Minsterworth and Quedgeley. The construction of a new Transport Hub (Park and Ride) as always envisaged and partially provided for in the form of the dedicated Bus Lane, off the Highnam Roundabout also needs to be constructed to soak up and make more sustainable provision for increasing volumes of commuter traffic travelling eastwards towards Gloucester.

Utility Services: The current network of services to the existing community (gas, electricity, domestic water, surface and foul water drainage, telephonies, broadband etc.) are already at full capacity, of some vintage, and will be stretched further once the additional outline approved residential and commercial development is undertaken. Service outages, leaks and general breakdowns are a regular occurrence. This creates serious constraints on additional development, the provision of which would take this beyond breaking point. Again, should any further significant development be contemplated, feasibility studies undertaken by the various utility providers would be essential. Doubtless either major upsizing of existing services or the provision of completely new services would be required before any new development could be pursued.

Flooding: Climate change related pressures are already causing major flooding headaches and problems in the whole locality stretching from Maisemore, across Highnam and westwards to Churcham, Minsterworth and beyond. The increasing incidence of closure of the A417 towards Maisemore regularly requires traffic to divert through Highnam thereby adding to peak flow congestion. Surface water flowing off the new housing development at Lassington Reach is already creating downstream flooding problems through Highnam Court and beyond through Minsterworth to the River Severn. Clearly, significant additional development would seriously compound this. A major rethink of surface and land water drainage provision across the whole locality would be essential before any additional development could be contemplated.

Environment: Highnam is an attractive location well provided for with important heritage assets (Church of the Holy Innocents, Highnam Court etc.), a traditional landscape patchwork of field hedgerows and boundaries, woodlands, together with plentiful wildlife. Landscape setting requires careful, sensitive nurturing to provide the necessary levels of protection and should be a foremost consideration should further development be considered.

Housing Mix: The Council recognises the need nationally to construct more housing, but strongly feels that over the past 40 years, and particularly more recently, Highnam has grown at a faster rate than the majority of other communities in the Borough so should not be required to take any appreciable additional numbers.

The village is largely a dormitory community with very limited indigenous employment; an ageing demographic; and an imbalance of housing types and sizes. Some modest scale retirement/wrap around care facilities might assist free up larger dwelling houses to create a more dynamic local housing market. Any additional social/ affordable housing provision would require careful sensitive planning to ensure it satisfies demonstrable, independently

verified local needs for young families who really wish to live in the community, which an updated Housing Needs Survey would establish. Possibly, there might be scope for modest, properly controlled self-build or community lead housing provision in appropriate locations.

Community Infrastructure: The current range of facilities serving the village: Primary School, Doctors' Surgery, Nursery, Shop/Post Office, Community Centres, Children's Play Areas, Open Spaces, Allotments and Recreation Ground, are barely sufficient to serve the existing community let alone accommodate any larger population. It is particularly concerning that the Primary School, which now takes in children from adjoining parishes, has to turn away pupils from village families, including siblings, who now have to travel to Gloucester and elsewhere for their education. Whilst appreciating that CIL and Sec 106 financial and in kind contributions help alleviate these pressures, before any additional development is considered a major strategic review should be undertaken to assess the adequacy of existing facilities, and make proper financial masterplan provision for them to be funded by developers. A holistic approach, rather than piecemeal consideration of individual planning proposals as they come forward, is required to determine the essential infrastructure required to serve the community.

Sustainability: As has already been mentioned, Highnam is essentially a dormitory community where the majority of people of working age travel elsewhere for their employment. This is not sustainable in the long term if we are, as a society, to reduce our carbon emissions by cutting down on car journeys. An upgrade and provision of additional buses would therefore help provide more sustainable modes of travelling. Any new development should also be underpinned by an appropriate provision of indigenous local employment opportunities. Similarly, the retail offer within the village is minimal- a single small convenience store/post office. Should additional development be pursued it should make space for a small number of retail outlets to reduce reliance on car journeys to other retail outlets.

Housing and Economic Land Availability Assessment (HELAA) and Call For Sites Initiative: It was always understood that proper town and country planning looked at future needs, trends and visions rather than taking an opportunistic approach to site allocation for development as appears to be the case now. Whilst the consultation states that: "*the HELAA has no planning weight and does not in itself determine which sites should be granted planning consent*", this is exactly what it appears to be doing. By collecting together a pot pourri of sites put forward sporadically by landowners and developers in recent years, many of which have no intrinsic development potential or merit, creates a strong impression, certainly to the lay person, that this is a foregone conclusion. This is compounded by the detailed assessments which underpin each site where indicative potential housing numbers have been cited; where broad assessments of development potential have been undertaken; and where a rating of development suitability has been accorded to each site. This has inevitably focused attention too prematurely on micro site related issues and flies in the face of effective forward planning which this whole exercise purports to do. It is our considered opinion that this whole part of the exercise should not have been undertaken at this stage but left until the broad strategic framework for future development had been

completed at which point general localities for future development could be properly identified and assessed irrespective as to whether individual sites had been previously put forward or not.

Notwithstanding the intention to return to this next year, as individual sites within the parish have been put forward and some assessed as potentially suitable for development, we briefly comment on a without prejudice basis on each site, but reserve the right to return to this when more detailed assessments are undertaken. In general terms we are concerned at the potential loss of good quality, productive farmland which greatly contributes to our need for food security and helps maintain local bio diversity:

- *HIG009 – Land south of A40 straddling Highnam and Churcham* – One of the three options put forward for a new 4,000 house settlement. We were greatly surprised and extremely disappointed that this option had been put forward for consideration especially given its firm rejection by the Forest of Dean District Council (FoDDC) as recently as January 2021. We can do little better than attach the Six Parish Council Communications Group Report on the Local Plan Preferred Option which Highnam helped prepare. Circumstances have not changed, and we would strongly urge that this option be dropped in its entirety for all the reasons eloquently set out in the Report. We would hope also, as part of its statutory Duty to Collaborate, that the Borough will closely work with its FoDDC colleagues to better understand why this proposal was not taken forward.
- *HIG010: Land to west of Highnam*: This includes land already the subject of the recently approved in outline at planning appeal so should be omitted from this assessment.

With regard to the remainder of the field to the west of the Lassington Reach sites, we remain extremely concerned about the prospect of further opportunistic and unconnected planning proposals coming forward with potential for additional inappropriate road accesses on to the B4215 road.

The land to the south of the B4215 currently forms the long established and well patronised Rodway Hill Golf Club. It has been laid out with undulating contours, judicious landscape planting, and forms an important leisure facility and wildlife haven. It should be protected against development and retained in its current use.

- *HIG011* – This open farmland has no discrete means of access for development, lies in established open farmland, and has no intrinsic merit for alternative use development.
- *HIG006, 007 and 013*: These sites were speculatively put forward by a development promoter called Terra Strategic over 6 years ago. They were very strongly opposed at the time by local residents following presentation at a Public Meeting in the village. These sites straddle Lassington Wood, an important wildlife, leisure and amenity facility much enjoyed by residents. These sites are all totally unsuitable for any form of development, indeed HIG006 lies on the crest of a prominent hill and landscape

feature, and HIG013 largely comprises steeply sloping, unstable land. We were concerned that these sites were included as we have heard nothing further from the land promoter for many years and were dismayed to learn that the initial assessment of these sites rated them as potentially suitable for development. This calls into question the competence of those making these assessments or demonstrates that no on-site detailed analysis of their suitability has been undertaken.

Neighbourhood Development Plan: Highnam, of course, has a Plan, made in 2017 and still in force. We would expect this to continue to have full statutory status as this Consultation progresses. We have given thought to the preparation of a new Plan, and would welcome the opportunity to meet with Borough Planners to discuss whether it would be appropriate to continue with this or whether a more focused, nuanced approach aligned to the Consultation exercise would be more appropriate; together with a dialogue about what support the Borough could provide in the preparation of a new Plan.

Finally, we remain greatly concerned about the risk of further speculative and predatory planning applications coming forward in the intervening period before this new Plan is eventually adopted, presumably some three years hence, especially given the Borough Council's acknowledged lack of a five-year housing supply as evidenced by the outcome of a stream of planning appeals in 2023. We would strongly urge the Borough Council to take urgent measures to redress this deficiency as soon as possible.

Cllr Charlie Coats Chair: Highnam Parish Council - 27.2.2024