**Application Ref 20/00140/OUT Land off A38 Part Parcel 0120, Tewkesbury Road, Coombe Hill – Outline application for up to 150 dwellings, associated infrastructure, ancillary facilities, open space and landscaping with vehicular and pedestrian access from A38. All matters reserved for future consideration**

A Parish Council Meeting was held on the 13th May 2020 to consider the above planning application. This new application replaces the earlier one 17/01337/OUT for 40 dwellings and the associated infrastructure. It has been circulated widely to those within the parish and our neighbouring parishes of Deerhurst and Apperley, Norton and Elmstone Hardwicke. The previous comments and concerns raised over the 40 houses have not diminished, instead amplified more than threefold.

Discussions centred on several key areas:

Housing Need

The JCS policy 2011 to 2031 was adopted in December 2017. Policy SP2 outlines the distribution of new development; with section 5 providing specific information on Rural Service Centres and Service Villages like Coombe Hill. The Service Villages will accommodate lower levels of development allocated through the Tewkesbury Borough Plan (TBP) 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 including existing levels of growth over the plan period. Published figures over the plan period to 2031 indicated that Service Villages will accommodate approximately 880 new homes; Coombe Hill was originally recommended to take 18 new homes as part of this process. This has now been revised upwards to 76 houses (200+% increase) in the latest version of the TBP. It continues to be suggested that there is no urgent ‘need’ for any more housing within the Service Villages.

The Parish Council, along with the involvement of some 25 plus parishioners, have been working on a Neighbourhood Development Plan for more than two years. This emerging document looks at housing development together with the wider social, economic and environmental requirements of the parish. This is a focused piece of work which has been based around the data used for the adopted JCS report. The recommendation of 18 houses at Coombe Hill was accepted by the parishioners and has now been very reluctantly revised to mirror the figures in the TBP (that has now been submitted to the Inspectors for examination). Any new developments should ensure integration of new residents into the existing community. To encourage continuity and embrace the rural aspects of the existing character of the community, there should be no street lighting, each house should have sufficient parking for 2 to 4 cars (space for residents and visitors) and houses must not be more than two storeys high. The way in which a site is capable of integrating with the existing settlement has particular relevance when considering the ‘social’ aspect of the site’s sustainability credentials.

Development Size and Location

It was noted that many of the documents submitted for the initial outline application for this site contained information based on a site of 100 houses and not the 40, so the revision upwards was no great surprise. There has never been a large scale building proposal at Coombe Hill since the Canal opened in 1796. Housing development has only seen single builds in the last 200 years.

The increased proposal of 150 houses crammed on the site known as C001 is totally disproportionate to the size of the existing village/community at Coombe Hill and therefore not appropriate. This will totally destroy the very character of the village that people would like to move to. There is a site specific policy for this site which has been totally ignored by the developer.

A report commissioned by TBC as part of the JCS/Service Village process, stated that 20 houses per hectare (low density) was considered appropriate for a rural site and 30 houses per hectare as high. A higher density is unacceptable and entirely not in keeping with this rural site. The visual and physical restraints on this parcel of land have been well documented, both as part of the ALA/SHLAA/SELAA and the TBC’s paper on Approach to Rural Sites used as part of the supporting evidence in the JCS process.

The existing houses are all very individual and unique – a housing estate of identical boxes is completely the opposite and will contribute nothing to the visual aspects of Coombe Hill. Currently, development at Coombe Hill is linear; a proposed estate is another contradiction.

Flooding

Concerns highlighted over the surface water runoff from the new dwellings and the lack of mains sewers have not been answered (there are no mains sewers in the whole parish). There is scant reference to the wet ditch at the bottom of the field. This ditch marks the boundary of the field and a house called the Bellows which has been flooded badly twice in the last 10 years. The water from this ditch flows into the Leigh Brook stream which also floods on a regular basis. Flooding is exacerbated by the small size of the culvert under the A4019 and its raised position. There is no suggestion that this ‘bottle neck’ for water will be upgraded to cope with the additional volume of water created by the extra surface water.

Flooding aside, where will the water go from the proposed SUD’s system? If it is expected to permeate its way into this ditch it will pollute the aforementioned water courses and cause undue stress to the owners of the Bellows and wider community downstream. Local knowledge can prove the annual flooding of this area and a correction to the Environment Agency Flooding map information is required. The SUD’s will not cope. The release figures are high. Once this system is in place who will be responsible for its longevity and who will finance any claims as a result of failure?

It was also noted that there is no water harvesting incorporated on the new houses to help alleviate water run-off issues, as it is too expensive to install.

The major development at Uckington will also drain in the River Chelt and Leigh Brook system, exacerbating flooding downstream at the south end of the Parish. The impact of this cumulative effect must be considered.

Highways/Traffic

Traffic flow at the junction is poor, especially during peak travel times. Previously submitted traffic reports suggested that traffic data had been averaged and was not considered accurate. The statistics are questionable as they are selective in their survey times and days. News is currently emerging about the successful four-way opening of the M5 junction 10 including the upgrade of the road system around Coombe Hill. This will add further traffic to an already busy road. Factor in an all too common M5 motorway closure and the road system becomes gridlocked creating lengthy delays and unwarranted traffic pollution. Neighbouring Parish Councils are all concerned about increased traffic issues.

Sites C001 and C002 are almost directly opposite each other. How is safe entry and exit possible when they are directly opposite each other, close to the petrol station and the main A38/A4019 junction?

Sadly local schools are currently oversubscribed, and 2 of the 3 schools are not on a direct bus route. This planning application suggests family housing but it is evident that residents will be heavily dependent on car travel and not the local buses, one of the contributing factors for Coombe Hill becoming a Service Village. Local knowledge will confirm that although buses are frequent through Coombe Hill, they rarely run in the right direction at the right time for a would be traveller, especially for school attendance.

Environmental Impact

It is widely known that Natural England and the WWT are strongly opposed to this application. Suggesting that the natural reserve and SSSI is being offered up as part of the Open Space requirements will see private land closed off to the general public to protect the varied flora and fauna and remove a facility from existing residents.

TBC commissioned a Landscape and Visual Sensitivity Study back in November 2014 which confirmed that “Coombe Hill occupies a prominent ridge at the junction of the A38 and A4019 and “it is **sensitive to conspicuous development** on the exposed side slopes of the ridge that would be visible in long distance views and would be at odds with the established settlement pattern (which is loosely cruciform)”. TBC have been reminded of this study at every opportunity

In conclusion, this application fails to respect the extensive work and consultations undertaken in development of the JCS and the emerging Tewkesbury Borough Plan and our own Neighbourhood Development Plan. It makes a mockery of the planning system.

The application does not take account of the current size of Coombe Hill together with the recommendations of housing numbers to be built as outlined in the adopted JCS policy or the TBP that is currently with the Inspectors. It **fails** to acknowledge the parish requirements as identified through its emerging Neighbourhood Development Plan. It **fails** to acknowledge a significant increase in vehicle movements. Current site options have provided insufficient information to determine how safe and suitable access can be achieved for vehicles and pedestrians to/from and adjoining the corresponding sites and wider community. This is contrary to Section 9 of the NPPF and Policy INF1 of the JCS Dec 2017 Document. Insufficient information has been provided to determine how surface water would be satisfactorily captured, managed and conveyed within the development sites, whilst maximising water quality and amenity benefits, and no reference to future climate change allowances has been provided. This is contrary to Section 14 of the NPPF and Policy INF2 of JCS Dec 2017 Document together with the TBC Flood and Water management Supplementary Planning Document from March 2018 and the TBC declaration on a climate emergency in October 2019. It **fails** to address the problem of localised flooding both on the site and its closest neighbours. Due to the number of proposed houses it **fails** to recognise that local schools are over-subscribed and that local infrastructure (sewage, gas, phone etc.) will need to be improved to ensure no negative impact on existing neighbouring home owners. It **fails** to address any environmental impact issues raised and lack of open space requirements that need to be provided by the developer.

The Parish Council, after consultation with its Parishioners, has no option other than to object IN THE STRONGEST POSSIBLE WAY to this current proposal based on the information submitted by the applicant as it bears no resemblance to the intentions of JCS, TBP or Leigh NDP.