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Further to the Ashchurch Concept Masterplan (ACM) the following is the response from Ashchurch Rural Parish Council (ARPC) which is additional to the collective response from ourselves and neighbouring various parish councils. It reflects the opinions of our residents and the community Ashchurch Parish at large.

We believe that this ACM is fundamentally flawed & undeliverable as previously advised and the fact that we are being asked to comment within this framework is not necessarily productive. However we can advise as follows:

## Consultation

- This ACM was devised and created with no input from the local community and ARPC. Tewkesbury Borough Council Statement of Community Involvement (SCI) is dated May 2013 and sets out how the Borough intends to engage with communities during the planning process which includes preparing development plan documents such as this ACM.
- We note that there is a section in the SCI which covers Plan & Policy preparation and that paragraph 2.1 of this SCI states:

*“Preparation of a local plan is governed by statutory procedures. The council will ensure that whilst complying with the regulations we will endeavour to go beyond these to create an inclusive, far reaching and engaging approach to plan preparation”.*

In addition, the NPPF clearly states at paragraph 16c that:

*“Plans should be:*

*c) shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees:”*

- We note that TBC are expected to consult with and work with local communities, as set out in NPPF para. 40:

*Local planning authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage. They cannot require that a developer engages with them before submitting a planning application, but they should encourage take-up of any pre-application services they offer. They should also, where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community and, where relevant, with statutory and non-statutory consultees, before submitting their applications.*

- The ACM seems to be a strategy that has been predetermined without any consultation and without consideration of possible alternative provision. Therefore, it cannot be concluded that a Garden Town in Ashchurch is the most sustainable approach to meeting Tewkesbury's housing need.
- The ACM plan seems to pre-judge any consultation with the community and is being presented as a fait accompli rather than a properly considered approach. It is seemingly being presented as a magic bullet to solve all the issues that TBC face rather than a cohesive plan with alternative strategies to resolve the existing housing shortfall that has been created.
- Overall the ACM and the subsequent last minute addition of 2000 dwellings for a Garden Town status is a significant departure from and contrary to the agreed JCS development plan where it states under:
  - *item 2.23 that "The character of the rural area will be protected and enhanced". Item 2.25 states "In addition to any special provision through a Green Infrastructure Strategy, distinctive landscape character will have been protected, landscape features maintained and enhanced, and the countryside will be richer in wildlife with improved access for all. The tranquillity of the countryside will have been safeguarded, and noise and light pollution minimised. New development will be appropriate in scale, design and energy efficiency that specifically state that the character of the rural area will be protected and that the tranquillity of the countryside will be safeguarded and noise and light pollution minimised".*
  - In addition item 3.2.4 of the JCS states *"Most of this development will be in the form of urban extensions within Tewkesbury Borough, because of the nature of the administrative boundaries in the JCS area. Tewkesbury town plays a smaller role in accommodating new development due to its size, and the rural areas will accommodate a lower amount of new development, most of which already has planning permission".*

The ACM clearly totally ignores the above approved position.

## The Plan

- The scale of the plan is to build 8010 dwellings plus a further circa 2000 dwellings seemingly added at the last minute to comply with Garden Town status that requires a minimum of 10,000 dwellings. This effectively more than doubles the population size of Tewkesbury and the surrounding area over the next 15 to 20 years into what is currently a distinctly rural community. It effectively tries to satisfy the future demands of the whole of the Borough of Tewkesbury and perhaps demands from other areas into one location in the guise of a Garden Town.
- Plans to develop a further 120 Ha of employment in and around junction 9 of the M5 is ill considered and undeliverable. There is no detailed amount of employment growth at Ashchurch set out in existing policy and strategy within the JCS and thus no justification for this volume of additional employment development.
- In addition, the plan to develop land at Fiddington for employment use is contrary to the evidence base submitted by TBC for the JCS when it considered the site for residential use. The JCS inspector accepted that this site was suitable for residential development and envisaged that the site could contribute to TBC's 5-year housing land supply and recommended that the land at Fiddington be allocated for dwelling development. Why are TBC ignoring this?

- We question the sustainability of a New Town at Ashchurch alongside the existing town of Tewkesbury. If the ACM became reality this New Town combined with the already approved Retail Park nearby will either likely become a serious competitor to the economic well being of Tewkesbury Town or itself be unsustainable. There is no evidence within the ACM to suggest that both could flourish economically.
- It is well documented that the infrastructure is simply not in place to accommodate the proposed level of growth. Proposed development of additional roads to alleviate the congestion already in place on the A46 are not practical and even if achieved, will not deliver the relief required to accommodate this level of growth.
- Construction of circa 10,000 houses and an additional 120 Ha of employment land will generate so much traffic locally that substantial remodelling of the existing road network involving major construction and demolition of existing structures including some housing will be necessary to achieve it. Even then, significant congestion will ensue for all local residents as the plan tries to “shoe horn” these additional traffic volumes into the local road network. Additionally, we question whether the funding is available and if such a scheme would be given priority. We are also unclear about the phasing of the new required infrastructure.
- Major additional infrastructure will also be necessary in the form of an expressway from Teddington Hands to junction 10 M5 to divert through traffic away from junction 9. Once again no answer to where this is possible funding will come from?
- The southern relief road within the plan is simply a device to open up existing farmland for development. This road will join the existing by pass and bring traffic from Teddington Hands area. It is not clear what happens to this traffic when it arrives at the existing Tewkesbury by pass except to cause further congestion. Where is this traffic trying to get to? It is clear that this attempt at “blue sky thinking” is flawed with little consideration as to what the effects would be.
- The ACM plan sets out on page 42 under the heading Transforming the Sustainable Movement Environment a number of initiatives and interventions such as park and ride, rail improvements, bus service improvements and active travel and yet there is no viability assessment. It is seemingly added without any substantive thought even at this conceptual stage. For example where are these people using park & ride going to and why?
- Phase one is undeliverable as stated within the plan. The proposed bridge over the railway north of the existing level crossing and subsequent new road to effectively connect the B4079 and B4080 achieves very little in terms of traffic relief. It is seemingly a road to nowhere. Once again this is simply another device to open up development land north of the MOD site for housing without consideration as to where the residents will want to travel to and the required infrastructure to support this. We question whether incoming residents would want to use this new road.
- Phase two is reliant on the release of the MOD site which will not even be considered for release for another 10 years and even then, will not necessarily be available for some years after that. The end period for the JCS is 2031, and it is questionable whether this site will become available within the plan period. We therefore question why this site is even under consideration. It is our view that the MOD site should be considered a long term potential site able to provide additional capacity for development when availability confirmed. It certainly

should not be considered until there is a full review of the JCS. We also note that Phase one is reliant on the release of this MOD site to provide access to the A46 and a possible solution for the Phase one residents, but even then, the additional traffic will generate more congestion onto a road that is already at capacity. These points on the inadequacy of the infrastructure proposals were made in preceding comments.

- The proposal pays little regard to the fact that some degree of flooding is a regular occurrence in the area. There are 2 water courses – the Tirlle and Carrant Brooks both of which feed into the rivers Avon and Severn. Surface water is effectively held on the fields prior to feeding into various ditches criss-crossing the area and into these brooks. Major construction of housing and the infrastructure to support them will remove flood storage capacity for this surface water. This will exacerbate flooding risks for existing residents whose homes are not built on elevated foundations but also those properties down stream. Localised simplistic theoretical solutions such as attenuating and balancing ponds will not compensate for the loss of these flood storage features and yet once again planners are seemingly ignoring these risks
- The idea of creating a new town centred around the church of St Nicholas at Ashchurch just because there happens to be a train station close by is once again flawed. The area around the church is occupied by a Grade 2 listed building, ancient trees and grounds including a graveyard with some land gifted in trust for the benefit (not ownership) of the Rector. To seemingly trample over these features is not acceptable or necessary. It may be possible to create a “centre” further to the east but even then, the possibility is limited unless major demolition of existing housing is undertaken which is perverse given the housing shortage.
- The train station itself has limited car parking for its current use let alone any expansion. Theoretical belief that residents within a rural area who could utilise the train more will use public transport to access the station is again flawed.

To be constructive we recognise that some development is necessary within the Borough and certainly the parish of Ashchurch has capacity to satisfy some future housing needs. We note the progress at our neighbouring parish of Stoke Orchard. This new development should be confined to housing and be compliant with the JCS plan as identified above. The MOD site should only be considered for mixed used development when its availability is certain.

There are a number of alternative sites across the Borough that provide sufficient additional housing capacity that can be created without detrimental effects of flooding or development of major infrastructure works. These developments should be of a scale similar to Stoke Orchard with house design commensurate with a rural environment within the local area.

We refer you to the traffic evidence work that sits alongside the adopted JCS for junction 10 M5 to be made 4 way for all movements. We understand the design phase is currently underway and is necessary for the proposed development west of Cheltenham. Land to the west of this junction is an alternative site that is available for employment having a larger capacity where the transport and flooding issues either do not exist or are less pronounced. There being circa 450Ha of open countryside available and certainly enough to provide 120Ha of employment development and some housing in an area where additional major infrastructure is not required. This would appear to be an area better suited to satisfy the shortfalls in Gloucester and Cheltenham.