

## 1. Introduction

The following comments relate to the Tewkesbury Part 2 (Partial) Green Belt Review (hereinafter referred to as the “PGBR”) which provides the evidence base for the proposed release of Green Belt land in the emerging Local Plan. The comments specifically relate to the land south of Two Hedges Road Woodmancote covering the assessment of land parcels P34 – P38, being the land that would need to be released from Green Belt to bring forward the Woodmancote Site 4 option.

Comments relate to PGBR sections, Appendix 1 Detailed Parcel Assessments Parcel 34 to P38 and Appendix 2 Cumulative Release Scenario C6.

Although the emerging Local Plan is not proposing to bring forward Site 4, the site promoters continue to argue that it should be included and are using the PGBR as evidence to support their claims that the local plan is inconsistent in releasing Green Belt land at Shurdington but not at Woodmancote.

## 2. Summary of Objections

- That the PGBR harm assessment for releasing Green Belt land that covers the Woodmancote Site 4 option (Cumulative Release Scenario C6a) of “low - moderate” is objectively flawed and therefore unsound.
- That the strength of the proposed new Green Belt boundary for Cumulative Release Scenario 6a is significantly over stated and when combined with the assessment criteria used establishes a precedent that would allow the same flawed arguments to be repeated in justifying further salami slicing of Green Belt land towards Southam.
- That the harm assessment of Green Belt release is inconsistent with the Joint Core Strategy (JCS) Green Belt Assessment prepared by AMEC in September 2011 which rated the Woodmancote Green Belt area as critical for maintaining the separation of Bishops Cleeve and Cheltenham (equivalent to a “high” release harm rating).
- That no consideration or weight has been given to the role that Woodmancote’s Green Belt plays in setting the scene for the Cotswolds AONB.
- That the PGBR fails to recognise the Special Landscape Area (SLA) designation of parcels P36 to P40 and does not consider the loss of SLA land in the assessment.
- There is no precedent within the emerging Local Plan for release of Green Belt land that would cause moderate harm to Green Belt purposes. Furthermore, release of Site 4 from Green Belt would close the gap between Woodmancote and Southam by 20% and replace the permanent road Green Belt boundary at Two Hedges Road with a hedge and fence boundary that could easily be moved, lacking the permanence prescribed by NPPF.

### 3. Evidence in support of objections

#### 3.1. That the harm assessment for the Cumulative Release Scenario 6a (combining parcels P34 – P38) is unsound



The PGBR divides up the Woodmancote Green Belt into seven parcels for assessment labelled P34 to P40. No rationale is provided to explain why the area has been sub divided into so many parcels for assessment. Given that they all share the same southern boundary line and each parcel would have at least one weak east or west boundary line, it is inconceivable that individual parcels (with the exception of P34) could be considered for release without creating a precedent for release of the other parcels. The main reason for the multiple parcel assessment approach appears to be to provide some form of rationale to down grade the harm rating for Cumulative Release Scenario 6a in order to provide the potential to bring forward Woodmancote Site 4 for development.

The land associated with Woodmancote Site 4 comprises parcels P34 to P38 which covers 6.8 ha. These parcels are also assessed cumulatively as Cumulative Release Scenario 6a. Parcel P34 (2.4 ha) primarily comprises of the Gloucestershire Warwickshire railway line, existing houses, gardens and disused agricultural buildings. The PGBR concludes that release of this parcel from Green Belt would have a **“low - moderate”** harm impact. This is not surprising given the parcel is fully developed. However, it seems pointless to identify this land parcel for assessment when it has no potential for development. Parcels P35, P36, P37 and P38 are identified as primarily pastoral land having a **“moderate”** harm impact. These parcels are also designated Special Landscape Area (SLA) although this is not recognised in the PGBR

Cumulative Release scenario C6a harm assessment is rated “**low - moderate**”. The down-graded harm rating over the individual parcels P35 to P38 is justified “*due to the potential to create a more robust permanent Green Belt boundary, the combined release of cumulative scenario C6a is considered to have a lower level of harm to the Green Belt than their release in isolation*”. This argument is both illogical and inaccurate.

- It is illogical because the harm rating is independent of the establishment of any new boundary. The more logical impact of the cumulative release scenario is that the harm rating should be higher than individual parcels as the cumulative area of land released from green Belt would be significantly greater and the impression that Woodmancote is sprawling towards Southam would be heightened. In fact this release would reduce the distance gap between Woodmancote and Southam by 20%.

Perversely, Cumulative Release Scenario 6b, which adds P39 to 6a has a harm rating of “moderate” even though P39 has the same individual harm rating as P35-P38.

The JCS AMEC Green Belt Review assessment rating of a “**high**” level of harm to Green Belt purposes is a more realistic assessment.

- It is inaccurate because the strength of the proposed new Green Belt boundary for Cumulative Release Scenario 6a is significantly over stated.

PGBR claims that release of C6a establishes “*a new Green Belt boundary formed of straight robust hedgerows with mature hedgerow trees lined by a small drainage ditch*” and affords “***the potential to create a more robust permanent Green Belt boundary***”. This is implausible because a much weaker Green Belt boundary would be created than the permanence afforded by the existing Two Hedges Road boundary. Clearly P34 could be released from Green Belt in isolation without establishing a weak Green Belt boundary because its established boundaries are robustly defined by existing buildings and gardens. Conversely, release of P35-P38 would establish a new ditch and hedgerow boundary that could easily be moved and does not comply with the permanence requirements of the NPPF. The PGBR acknowledges that release of Cumulative Release Scenario 6a would result in a “***slightly weaker***” Green Belt boundary than the current Two Hedges Road (THR) boundary.

The proposed boundary cannot be considered robust or permanent and sets a precedent for future arguments to move the boundary further towards Southam.

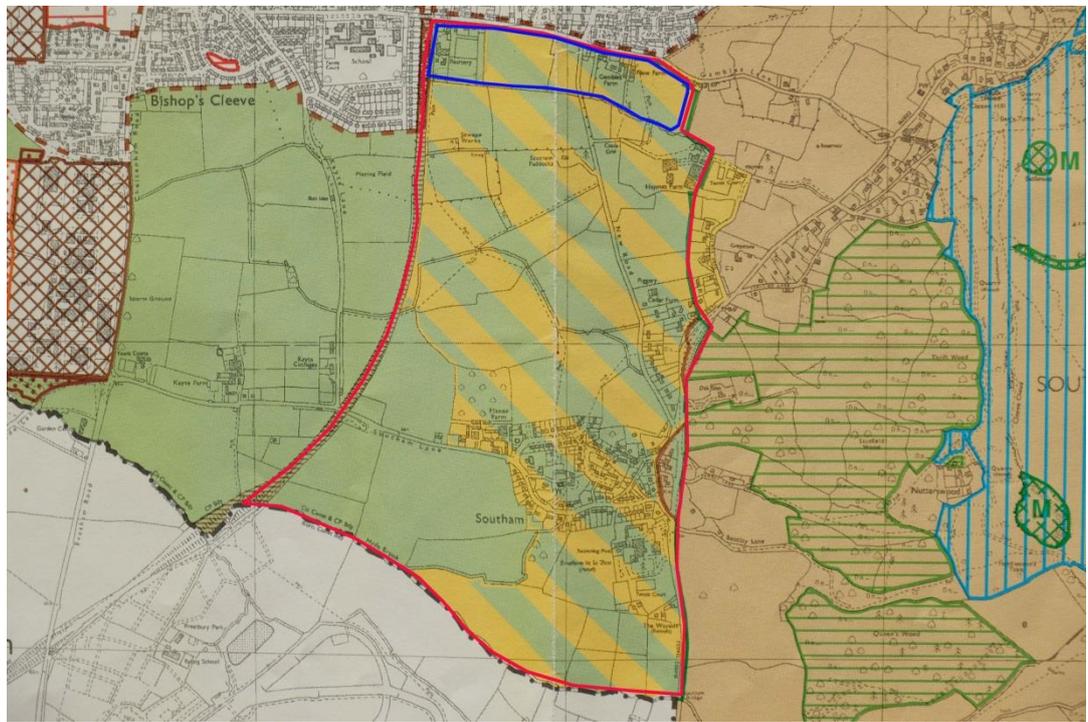
3.2. The PGBR is inconsistent with the Joint Core Strategy Green Belt Assessment prepared by AMEC in September 2011.

The AMEC Assessment concluded that the NE20 segment, which includes Woodmancote, made a significant contribution to Green Belt purposes, that the land is critical to the separation of Cheltenham and Bishops Cleeve and forms the southern boundary of Bishops Cleeve preventing sprawl along New Road and Gambles Lane and around Southam. This assessment is equivalent to a “high” harm rating for releasing land from Green Belt.

PGBR does not explain how its “low - moderate” harm assessment for removing a significant portion of the NE20 segment can be rationalised with the conflicting AMEC conclusion. Independently assessing salami slices of a larger segment in isolation without assessing the associated impact on the original area of assessment risks undermining the high level of protection that the JCS intended for the NE20 segment.

The illustration below shows the scope of areas covered by the AMEC Assessment and the PGBR as indicated by the following key;

- Boundary of AMEC Assessment, segment NE20
- Boundary of PGBR, parcels P34 – P40



### 3.3. Other factors that affect the soundness of the PGBR assessment for Woodmancote

- Green Belt land proposed for release at Shurdington, although assessed by the PGBR as the same level of harm level, is not directly comparable with the land at Woodmancote. The key differences are;
  - All of the Green Belt land proposed for release at Shurdington is within the existing built line and does not close Green Belt distance with neighbouring settlements. Release of Green Belt land at Woodmancote significantly closes the distance between Woodmancote and Southam/Cheltenham.
  - Woodmancote Green Belt provides a setting for the adjacent Cotswolds AONB and is also designated SLA. Neither of these issues is considered in the PGBR.
- Whilst Shurdington is a standalone settlement that cannot be expanded without removing Green Belt land, Woodmancote has alternative land and is joined to Bishops Cleeve where new housing commitments are in surplus to plan by 590 dwellings.

## Part B – Please use a separate sheet for each representation

Name or Organisation: *Mike Taylor*

To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

Do you consider the Local Plan is :

1) Legally compliant	Yes	<input type="text" value="✓"/>	No	<input type="text"/>
2) Sound	Yes	<input type="text" value="✓"/>	No	<input type="text"/>
3) Complies with the Duty to co-operate	Yes	<input type="text" value="✓"/>	No	<input type="text"/>

Please tick as appropriate

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

*I strongly support the decision to retain the Two Hedges Road Woodmancote site (Woodmancote Site 4) within Green Belt.*

*The council has correctly recognised that Woodmancote is constrained in its ability to meet its indicative requirement of 201 homes due to its boundary with Bishops Cleeve and surrounding AONB and Green Belt designated land. The council is also correct in noting that Bishops Cleeve and Woodmancote is a combined locality and that committed developments within Bishops Cleeve, which exceeds its indicative requirement by 375 homes, means that new housing to support the vitality of Woodmancote is provided for locally.*

*The Plan correctly concludes that there are no arguments for exceptional circumstances that would justify removal of Green Belt land in Woodmancote.*

(Continue on a separate sheet /expand box if necessary)

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

	<b>No</b> , I do not wish to participate in hearing session(s)		<b>Yes</b> , I wish to participate in hearing session(s)
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Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature:

Date: