

ADDITIONAL REPRESENTATIONS SHEET

Date: 18 January 2022

The following is a list of the additional representations received since the Planning Committee Agenda was published and includes background papers received up to and including the Monday before the meeting.

A general indication of the content is given but it may be necessary to elaborate at the meeting.

Item No	
5a	<p data-bbox="284 546 453 573">21/01243/FUL</p> <p data-bbox="284 607 868 633">Land To The East Of High Beeches, Snowhill</p> <p data-bbox="284 667 1326 730">Snowhill Parish Council is unable to attend Planning Committee to speak and has sent late representations on the application which are hereby attached.</p>
5b	<p data-bbox="284 768 453 795">21/00976/OUT</p> <p data-bbox="284 828 916 855">Land Off Brook Lane , Twigworth/Down Hatherley</p> <p data-bbox="284 889 735 916">Additional Consultation Responses</p> <p data-bbox="284 949 1361 1102">Local Highway Authority - Has undertaken a robust assessment of the planning application. Based on the analysis of the information submitted, the Highway Authority conclude that there would not be an unacceptable impact on highway safety or a severe impact on congestion. As such there are no justifiable grounds on which an objection could be maintained.</p> <p data-bbox="284 1135 1329 1198">Twigworth Parish Council - The Parish Council has submitted a document titled 'Flood Risk in Twigworth - A record of failure'. A copy of the document is attached in full.</p> <p data-bbox="284 1232 916 1258">Updated Five Year Housing Land Supply Position</p> <p data-bbox="284 1292 1353 1534">Subsequent to publication of the Agenda it has become apparent that the November 2021 (April 2021 base) five year housing land supply statement had in error included three housing schemes within the Twigworth Strategic Allocation as part of Tewkesbury's supply. In fact, the supply from the Twigworth Strategic Allocation contribute to Gloucester City's needs and therefore must be deducted from Tewkesbury's deliverable supply. This is not an error that had been in previous five year housing land supply statements. This has the effect of reducing the (April 2021 base) five year housing land supply to a 3.83 year supply.</p> <p data-bbox="284 1568 1337 1659">Whilst this supply is lower than the 4.39 year quoted in the report (Paragraph 7.6), as set out in the report, the Council does not have a five year housing supply at this time and therefore the tilted balance is already engaged.</p> <p data-bbox="284 1693 469 1720">Officer Update</p> <p data-bbox="284 1753 1345 1906">The applicant has asked for additional time to continue discussions with Gloucestershire County Council as Local Education Authority in respect of the requested financial contribution towards education provision. Given the level of provision has not yet been agreed and the uncertainty of the outcome Officers strongly recommend the application is deferred to allow the discussions to conclude.</p>

In addition, Paragraph 7.57 of the Committee report sets out the tenure of the affordable housing would be split between affordable rented and shared ownership. The Council's Strategic Housing Enabling Officer highlighted that this was an error in the report and the tenure should be split between **social rented** and shared ownership, not affordable rented. As such, the affordable housing tenure has not yet been agreed and therefore discussions are also required with the applicant to establish whether an acceptable affordable housing tenure can be secured. Due to this, Officers strongly recommend the application is deferred to allow time to reach a conclusion on this matter.

Update on All Other Outstanding Matters

At the time of writing the Committee report there were a number of outstanding matters required to be resolved. An update on each, in the order in which they appear in the Committee Report, is provided below:

- Comments from the Local Highway Authority have now been received, see 'Additional Consultation Response' section above.
- The applicant is in the process of preparing a Mineral Resource Assessment. Once this has been submitted this will be reviewed by Gloucestershire County Council in its capacity as Mineral and Waste Planning Authority.
- The Council's Ecological Advisor has reviewed the Briefing Note submitted by the applicant and confirmed that updated survey/information in relation to bats and the potential for roosting features and Great Crested Newts is not required prior to the determination of the application, unless works do not commence before the next bat activity season (May - September).
- The applicant has not submitted calculations of the Biodiversity Net Gain for the proposal. However, should permission be granted, Officers consider it would be reasonable to secure a minimum net gain of 10% biodiversity net gain via a condition.
- The Council's Community and Place Development Officer has confirmed a contribution towards off-site sports provision would not be necessary to make the development acceptable in planning terms.
- The Council's Community and Place Development Officer has confirmed a contribution towards off-site community facilities would not be necessary to make the development acceptable in planning terms.
- In addition to the planning obligations listed in Paragraph 7.97 of the Committee report the following obligations are also recommended:
 - The provision of a LEAP on-site
 - £54,240 towards a Travel Plan
 - £15,000 towards improvements to the bus stop on the eastern side of the A38 (Bus Stop - stopID glodgjd)
 - In terms of the contribution towards education provision, this matter is still outstanding.

Revised Recommendation

Due to the ongoing discussions in respect of the requested financial contribution towards education provision and the proposed tenure of the affordable housing, both of which are fundamental planning matters, it is strongly recommended that the application is DEFERRED to allow discussions to continue and a conclusion on the outstanding matters reached.

	<p>Additional Conditions</p> <p>If the application were to be permitted a number of additional conditions would be recommended/revised, including those recommended by the Local Highway Authority and the Council's Ecological Advisor.</p>
5c	<p>20/01061/FUL</p> <p>Kimberley, Church End Lane, Twynning</p> <p>Subsequent to publication of the Agenda it has become apparent that the November 2021 (April 2021 base) five year housing land supply statement had in error included three housing schemes within the Twigworth Strategic Allocation as part of Tewkesbury's supply. In fact, the supply from the Twigworth Strategic Allocation contribute to Gloucester City's needs and therefore must be deducted from Tewkesbury's deliverable supply. This is not an error that had been in previous five year housing land supply statements. This has the effect of reducing the (April 2021 base) 5 year housing land supply to a 3.83 year supply.</p> <p>Whilst this supply is lower than the 4.39 quoted in the report (Paragraph 7.16), as set out in the report, the Council does not have a 5 year housing supply at this time and therefore the tilted balance is already engaged. The recommendation to Permit the application is not affected.</p>
5d	<p>20/00089/FUL</p> <p>Phase 1B, East Site, Homelands, Gotherington Lane, Bishops Cleeve</p> <p>Additional update</p> <p>Bishops Cleeve Parish Council removed its objection to the application on 7 January 2022.</p>

Item No. 5a – 21/01243/FUL - Land To The East Of High Beeches, Snowhill

APPLICATION NO 21/01243/FUL: STABLE AT HIGH BEECHES, SNOWHILL - REPRESENTATION

Submitted by [REDACTED] Chair Snowhill Parish

I regret that I am unable to attend the meeting - [REDACTED]
[REDACTED]. Thank you for the opportunity to present our concerns.

We are not objecting to a stable in the garden of High Beeches.

But we are strongly objecting to the stable in its existing location - next to the boundary wall, on the highest part of the garden - ie in the most prominent location.

As noted in the Development Manager's report, there are 14 objections - this is a large number for such a small village which has less than half the properties owner/occupied full-time.

The key point of the objections is that the stable needs to be moved.

The report refers to the "*Principle of Development*":

- This requires that, quote "*there are no adverse impacts on landscape*" and "*they would not have an adverse effect on the rural character and landscape setting*".
We consider **there is an adverse effect**.
- The report also states, quote "*the proposal is considered acceptable*"
We disagree

The report refers to "*Impact on the Landscape and Cotswolds Area of Outstanding Natural Beauty*":

- Quote "*developments are required to conserve and, where appropriate, enhance the landscape*".
We consider **the proposal meets neither of these criteria**
- Views to be, quote "*conserved and enhanced*".
We consider **the proposal does the opposite**
- It is claimed that the stable is "*logically sited*".
We consider that the logical location would be **away from the boundary wall and the road**, and **say close to the fence on the other side downhill and towards the house**. Perhaps it is logically sited for a summer-house!

A field shelter had been erected in a nearby field close to the road - this was used as a precedent in the application. An enforcement notice was issued and we are pleased to note that this shelter has now been moved to the other side of the field.

Based on the location of the stable, we request that this application is rejected - or, if approved, to be conditional upon moving the stable to a less visible location.

Thank you.

17 December 2021

FLOOD RISK in TWIGWORTH

A record of failure

George Sharpley

1

Following increasing local concerns about worsening surface-water threats to properties and the failure of sewerage pumping stations, members of the communities of Down Hatherley and Twigworth met via Zoom on 29th March and again on 5th May 2021 with:

David Hudson, Environment Agency
(Environment Manager, Gloucestershire)

James Blockley, Gloucestershire County Council
(Principal Flood Risk Management Officer)

Sandra Ford, Tewkesbury Borough Council
(Head of Development Services)

Matt Jeynes, Severn Trent Water
(Waste Team Manager Worcestershire & Gloucestershire)

2

At these meetings we presented evidence of surface-water (pluvial) flooding during the winter of 2020/1, especially on the new building sites at

Twigworth Green (Bovis Homes)

and

Yew Tree Farm (Wainhomes)

There follows a summary of the evidence we presented.

3

This map shows both building sites marked in red. The dotted lines show sites with planning applications in process. The blue locates the photograph on the following page.



4

TWIGWORTH GREEN (24 December 2020)



5

Some weeks later, when the floodwater had to some extent cleared, the following photographs were taken from a drone.

The first two pictures show Twigworth Green.

The third page shows the neighbouring Wainhomes site at Yew Tree Farm.

6

TWIGWORTH GREEN (5 February 2021)



7

TWIGWORTH GREEN (5 February 2021)



8

YEW TREE FARM (5 February 2021)



9

Contractors and builders were unable to continue their work at Yew Tree Farm for some weeks.

Twigworth Green were also significantly hampered, although by the time this picture was taken the site had been partially drained by several industrial pumps clearing water to the Hatherley Brook.

10

The following map shows the authorities' pluvial flood map, with the building sites marked in red.

This map is used by developers when they submit their Flood Risk Assessments.

11

Pluvial floodrisk map



12

At our meetings with agencies, members of the community pointed out the inaccuracy of this flood map.

It is not the first time the vulnerability of this area to surface-water flooding has been raised with councils and agencies.

It is not the only location where surface-water flood risk is very poorly mapped.

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On 16th July 2021, in further exchanges following our two meetings, David Hudson of the Environment Agency replied to some of our concerns:

George Sharpley, resident of Twigworth:

“Am I correct to infer that you agree that the official pluvial flood map is not accurate (and therefore not a safe guide for planners)? The evidence is overwhelmingly so, but it needs to be acknowledged by the relevant authorities.”

David Hudson (Environment Agency) in reply:

“They (the flood maps) are, I believe fit for purpose.”

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On 28th June, after similar email exchanges, James Blockley of Gloucestershire County Council wrote the below about Twigworth Green, despite our sharing video and photographic evidence of the site overwhelmed with flood water, of pumps channelling water off the site, and of properties neighbouring the site experiencing unprecedented water ingress.

“Twigworth Green’s SuDS performance over the winter was not reviewed by the SuDS Engineer; we believe there was no need as there were no flood problems over the winter 2020/2021 that could be attributed to the developments at Twigworth.” James Blockley, Glos Cty Council, 28th June 2021

15

The concerns and the flood evidence of residents of Twigworth and Down Hatherley have been systematically disregarded now for some years.

It is continuing.

16

Tewkesbury Borough Council will soon be making a decision on a planning application for 164 houses, in a field between Brook Lane and Ash Lane, which borders both the Yew Tree Farm and Twigworth Green sites.

This below is from the letter of the statutory consultee on flooding, Gloucestershire County Council's Local Lead Flood Authority (13th Sep 2021):

“Surface water flood mapping indicates the site is not at risk of surface water flooding.” David Lesser, Sustainable Drainage Engineer

A picture of the site follows.

17



December 2020

18

Here is another inaccurate flood map from a recent application for 32 houses at the corner of Down Hatherley Lane and the A38. The flooding shown in the three photographs happens a lot more frequently than 1-in-75 years as shown in the diagram. The flooding of the road (bottom left) apparently last happened just after the reign of William the Conqueror.



19

This house close to Ash Lane is one of a cluster under construction. The blue pipe is transferring water to the drain. Is it any wonder residents were flooded and the pumping station failed when water that would previously sit in the fields is added to the sewers?



January 2021

20

And so it goes on.

The same can be said for sewerage. The Ash Lane pumping station in Down Hatherley failed last year, overwhelmed with flood water, which contributed to an unprecedented level of flooding of houses and properties in the Ash Lane area. It is evidently vulnerable to failure during major rainstorms. The pumping station has received some remedial attention from Severn Trent, but whether it will cope with the huge increase in usage from new developments remains to be seen. Residents believe that the next flood will once again cause it to fail, if it doesn't before. If the JCS allocation is followed through, it will be expected to cope with the sewage of hundreds of additional houses.

Two pumping stations in Twigworth also failed during the flooding last winter. These, to my knowledge, have not had any remedial work, despite being a part of the sewerage route, along with Ash Lane, for new developments.

We brought this to the attention of Severn Trent's Matt Jeynes, including the daily stench emanating from the Twigworth pumping station close to the entrance to Wallsworth. This remains ignored, except of course by residents close by.

21

The poet Ivor Gurney called these fields now under development Gloucestershire's 'water meadows'.

These meadows have for centuries acted as a sponge, holding water, with a very slow discharge.

The failure of people charged with monitoring our flood risk to record accurately the flood potential of these meadows of course puts many of us at risk. The truth is, soon, the sites under construction will indeed be relatively free of flood risk. For the ground will have been raised and covered with tarmac and concrete - with inevitable consequences for others nearby. The counter argument is that the attenuation ponds (SUDS) will compensate so that water run-off represents no greater threat off site than it did before. Of course, it becomes increasingly difficult to check such an assertion, as who has recorded or measured the previous run-off? And the assertion is ever more wobbly when we see the hopelessly inadequate assessments of flood potential before building started.

As those of us living close to these sites see an increasing volume of pluvial flood-water enter our properties, I suspect our official experts will try to pass it off as climate change.

George Sharpley
Twigworth
24th November 2021

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If you have evidence or comments to add, please contact your parish council:

Twigworth: George Sharpley: [REDACTED]

Down Hatherley: David Evans: [REDACTED]

Also available:

Rainfall Patterns in Twigworth (George Hedley & Neville Cowin, 2021)

Observations on the Hydrology of Twigworth (Professor Ian David Cluckie, FREng, Acad.CAE, FRSA, 2017)

Video: floodwater flowing off Twigworth Green (Chris Weaver, 2021)

Twigworth Flood Threats - The Village Evidence (George Sharpley, 2017)

And how we got into this mess in the first place:

Poor planning leaves flood threat worse for Twigworth (George Sharpley, 2021)