

PLANNING AND LICENSING COMMITTEE
14th June 2023
ADDITIONAL PAGES (*Published 13.06.2023*)

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LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985**

ADDITIONAL REPRESENTATIONS ON AGENDA ITEMS : Page 14 - 33		
Agenda Item No:	Ref No:	Content:
9	22/03495/FUL (Land West of Worwell Farmhouse Tetbury)	<p>RESPONSE RECEIVED FROM GCC LEAD LOCAL FLOOD AUTHORITY</p> <p>Please see attached dated 13 June 2023</p> <p>ADDITIONAL 5 THIRD PARTY COMMENTS OF SUPPORT RECEIVED, SUMMARISED AS FOLLOWS:</p> <ul style="list-style-type: none"> i. Other sites for the surgery are too expensive or otherwise not suitable; ii. Further housing in the town will require vital infrastructure; iii. Relocation of the surgery out of the town centre is required; iv. Scheme would improve the quality of and access to healthcare in the town; v. Proposed housing would address the issue of housing shortage in the area; vi. Development would contribute toward socio-economic growth of community; vii. There is an identified need for a new surgery' viii. SHELAA is a theoretical assessment and not an assessment that takes place with full details of a scheme; ix. Planning fears about possible further development are not valid considerations; x. The Healthcare Centre will accommodate existing needs, and allow for further growth of the town. <p style="text-align: right;">Cont/....</p>

Agenda Item No:	Ref No:	Content:
9	22/03495/FUL (Land West of Worwell Farmhouse Tetbury)	<p>ADDITIONAL THIRD PARTY COMMENTS OF OBJECTION RECEIVED, SUMMARISED AS FOLLOWS:</p> <ul style="list-style-type: none"> i. Proposal to build on an Area of Outstanding Natural Beauty is indefensible, and unjustifiable; ii. Application is inappropriate in light of the CDC declared Climate emergency; iii. There will be environmental costs of more people needing to drive to reach a surgery on Cirencester Road; iv. The surgery should be retained in the town centre; v. Missed opportunities from previous sites/developments; <p>ADDITIONAL THIRD PARTY COMMENTS RECEIVED BY MEMBERS OF THE PLANNING & LICENSING COMMITTEE:</p> <p>1 comment of support - please see attached comment dated 12 June 2023</p> <p>3 comments of objection – please see attached dated 12 June 2023</p> <p>COMMENTS RECEIVED FROM WARD COUNCILLOR (TETBURY WITH UPTON WARD):</p> <p>Please see attached correspondence from Councillor Chris Twells dated 12 June 2023</p>
10	21/03698/FUL (Tunnel House Inn Coates)	<p>SUPPORTING INFORMATION RECEIVED FROM AGENT:</p> <p>Please see attached correspondence and revised plans from LPC (Trull) Ltd dated 12 June 2023</p> <p style="text-align: right;">Cont/....</p>

Agenda Item No:	Ref No:	Content:
10	21/03698/FUL (Tunnel House Inn Coates)	<p>CASE OFFICER UPDATE:</p> <p>Additional Conditions:</p> <p>25. Prior to the on-site construction, introduction or placement of any of the new-build holiday units of accommodation hereby permitted within the application site, details of how the construction and facilities of said units will maximise energy performance and minimise any potentially harmful impact on climate change shall be submitted to the Local Planning Authority and approved in writing.</p> <p>The units shall be constructed in accordance with the approved details and maintained as such thereafter.</p> <p>Reason: In order to ensure the creation of an energy efficient development that addresses the impact of climate change.</p> <p>26. Prior to its installation, details of the sewage treatment plant shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>The sewage treatment plant shall be installed in accordance with the approved details and maintained as such thereafter.</p> <p>Reason: To ensure that the installation preserves the visual amenity of the site, which is within an Area of Outstanding Natural Beauty, in accordance with Cotswold District Local Plan Policies EN4 and EN5.</p> <p>27. The woodland area surrounding the new-build holiday units and their associated verandas shall not be used as an extended amenity area and shall not be used as an area for sitting out, dining or housing any domestic paraphernalia.</p> <p>Reason: To protect the amenity of the locality and tranquillity of the AONB, in accordance with Cotswold District Local Plan policies EN4, EN5, EN10, EN11 and SP3.</p> <p style="text-align: right;">Cont/....</p>

Agenda Item No:	Ref No:	Content:
11	<p>21/04539/FUL</p> <p>(Land off Cricklade Road South Cerney</p>	<p>CASE OFFICER UPDATE:</p> <p>Amended wording to Condition 3 and for the reason to Condition 4:</p> <p>Condition 3</p> <p>The occupation of the site hereby permitted shall be carried on only by the following and their resident dependants: Ms J Lamb</p> <p>Reason: In order to comply with the Planning Policy for Traveller Sites and Cotswold District Local Plan Policy H7 as an exception to policies of development restraint in open countryside locations</p> <p>Condition 4</p> <p>There shall be no more than 3 pitches on the site.</p> <p>Reason: In order to control the development and in the interests of visual amenity in accordance with Policy EN4 of the Cotswold District Local Plan and paragraph 174 of the National Planning Policy Framework.</p>



Lead Local Flood Authority

Shire Hall
Gloucester
GL1 2TH

Harrison Bowley
Cotswold District Council
Trinity Road
Cirencester
Gloucestershire
GL7 1PX

email: peter.siret@gloucestershire.gov.uk

Please ask for: Peter Siret

Phone:

Our Ref: C/2022/051464

Your Ref: 22/03495/FUL

Date: 13 June 2023

Dear Harrison Bowley ,

TOWN AND COUNTRY PLANNING ACT 1990 LEAD LOCAL FLOOD AUTHORITY RECOMMENDATION

LOCATION: Land West Of Worwell Farmhouse Cirencester Road Tetbury Gloucestershire GL8 8RY

PROPOSED: Mixed use development comprising healthcare facility, 27 dwellings (including 11 affordable units), landscaping, site access, internal estate road and associated works

I refer to the notice received by the Lead Local Flood Authority (LLFA) requesting comments on the above proposal. The LLFA is a statutory consultee for surface water flood risk and management and has made the following observations and recommendation.

Following the LLFAs comments on 17 May 2023, a Technical Design Note (21344-HYD-XX-XX-TN-D-0002-P01; 26 May 2023) has been submitted in response. This document shows that by expanding the soakaways serving plots 1-8 and plot 18, they are now in line with the CIRIA SuDS Manual (C753) and can be accommodated on the site.

The LLFA has no further objections to the proposal subject to the following conditions:

Condition: No development shall commence on site until a detailed Sustainable Drainage System (SuDS) Strategy document has been submitted to and approved in writing by the Local Planning Authority, this should be in accordance with the proposal set out in the approved submission (Proposed Foul and Surface Water Drainage Strategy; 21344-HYD-XX-XX-DR-D-2001-P04). The SuDS Strategy must include a detailed design, a timetable for implementation, and a full risk assessment for flooding during the groundworks and building phases with mitigation measures specified for identified flood risks. The SuDS Strategy must also demonstrate the technical feasibility/viability of the drainage system through

the use of SuDS to manage the flood risk to the site and elsewhere and the measures taken to manage the water quality for the life time of the development. The approved scheme for the surface water drainage shall be implemented in accordance with the approved details before the development is first put in to use/occupied.

Reason: To ensure the development is provided with a satisfactory means of drainage and thereby preventing the risk of flooding. It is important that these details are agreed prior to the commencement of development as any works on site could have implications for drainage, flood risk and water quality in the locality.

Condition: No development shall be brought in to use/occupied until a SuDS management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime, has been submitted to and approved in writing by the Local Planning Authority. The approved SUDS maintenance plan shall be implemented in full in accordance with the agreed terms and conditions.

Reason: To ensure the continued operation and maintenance of drainage features serving the site and avoid flooding.

It should be noted that work on the ordinary watercourse may require consent under S.23 of the Land Drainage Act, 1991. This is a separate process to the planning process and is carried out by Cotswold District Council.

NOTE 1 :The Lead Local Flood Authority (LLFA) will give consideration to how the proposed sustainable drainage system can incorporate measures to help protect water quality, however pollution control is the responsibility of the Environment Agency

NOTE 2 : Future management of Sustainable Drainage Systems is a matter that will be dealt with by the Local Planning Authority and has not, therefore, been considered by the LLFA.

NOTE 3: Any revised documentation will only be considered by the LLFA when resubmitted through suds@gloucestershire.gov.uk e-mail address. Please quote the planning application number in the subject field.

Yours sincerely,

Peter Siret
Sustainable Drainage Engineer

AGENDA ITEM NO 9

22/03495/FUL – LAND WEST OF WORWELL FARMHOUSE CIRENCESTER ROAD TETBURY

1 x Third Party Support Comment received 12 June 2023

I wish the following to be taken into consideration in support of the application.

1. The present doctors surgery is without doubt totally inadequate to meet the future needs of the growing population of Tetbury and is constrained by both its facilities and capacity to safely administer the necessary services. This endorsed by the doctors.
2. There is a lack of access in terms of enough safe car parking and I am told there are fire risk concerns within the main structure of the present building.
3. There is lack of space to expand the medical needs to match the present demand and future growth.
4. The present surgery position within the town presents many transport problems for those that now live on the perimeter and outskirts of the town both East & West in the new estates.
5. The town needs a new surgery with adequate room to take on an ever expanding need for medical intervention accommodating more doctors and medical practitioners. This new development offers that need making it more attractive to employ future doctors to the town.
6. There is nowhere else to put a new surgery all other offers have not come forward or been withdrawn and we have wasted years on the decision where to build.
7. The surgery proposal as it stands has received NHS approval. This means that despite the NHS having withdrawn their funding criteria for doctor surgery development and land being given over free in this case I believe just under 2 acres we have a green light for this development.
8. The developer has committed to build the surgery in conjunction with the doctors lease back basis over a 25 year plus period this is despite a massive increase in development costs
9. What other development site in the town has ever given over approximately 40% of the total area to what might be considered community need by the way of a surgery and 11 affordable dwellings.
10. The buyer affordable increase is an amazing ratio can anyone please tell me of any other site in the town that comes anywhere near to offering the same proportion or criteria to the Town of Tetbury
11. Local bus links into the town will be less of a problem. There are similarities which can be drawn with the development success of Malmesbury Care centre which had a similar situation doctors' surgery inadequate, no parking on high street, bad access, moved from centre of town to out of town, developed and expanded its medical provision, ease of parking and incorporated into local town bus service
12. Further unnecessary delay will cast doubt on the future provision of adequate medical care in Tetbury we have a growing population 6500 plus and the surgery has 8000 patients.

AGENDA ITEM NO 9

22/03495/FUL – LAND WEST OF WORWELL FARMHOUSE CIRENCESTER ROAD TETBURY

3 x Third Party Objection Comments received 12 June 2023

COMMENT 1:

The wild flower meadow

Leading up to this point a lot of words have been read and written in the democratic process aiming to advocate the 'right' thing, in deciding an Application which stirs a lot of emotions and different interests across the community.

Whilst I have spent a great deal of time managing, inspecting and providing health and social care services to several different communities across the country, on this occasion it is my overriding commitment is to do everything I can to defend the Area of Outstanding Natural Beauty which I walk in everyday.

It is therefore my priority considering where I live and walk most days, and also then the wider world of our climate. Somewhere along the way politicians, residents and landowners have to agree on, and settle on 'No' for an answer! On this tract of land there's loads of professional evidence, Assessment, science and environmental commentary etc etc to easily justify – 'No' for an answer!

As an animal sharing this Planet our species remain crushingly human centric, hell bent (literally) on meeting our own needs and still brutally misunderstanding that our health and well being relies heavily on wild flower meadows, bees, grassland, landscape and all the animal species we live with.

The benefits of a wild flower meadow *can* and, oftentimes should, outweigh our human needs for tarmac, concrete, houses and Healthcare Centres built on tracts of land like this. The truth is we humans need the natural world and the wildflower meadow to bring us health and well being just as much as we need healthcare services.

My hope, in your consideration is, how many 'this is **the** only one solution' Applications are you going to approve. There are lots of creative solutions often found, from Local Government Officers and Councillors saying, 'No'!!! My hope is you will throw down the gauntlet to GICB, Developers, Landowners and the Phoenix Group in this case, to find solutions which do not mean giving away and destroying our land heritage!!

The Land

Some basic facts on this Application still need to be restated regarding the formal professional assessment of both the quality and the 'high sensitivity' of the Worwell Farmland in relation the landscape it provides, the environmental and the biodiversity of the site.

- It's important for Planning and Licensing Committee Members, having now visited the site to return to basics. Cotswold District Council remain the proud possessor of it's very own Report – February 2021. This report was a formal Site Assessment Report made by a qualified Landscape Officer. In the Summary of the report Cotswold District Councils own objective professional opinion on the Worwell land and the 'doctors surgery' is clearly expressed, *'There is a need for a doctors surgery in Tetbury but the constraints on this site are such that it would be difficult for the benefits of a new surgery to outweigh the harm that would result from development in this location. **Recommendation: No part of this site is suitable for allocation in the Local Plan at this present time.***
- All the way through the Planning Process much concern has been expressed, together with evidence, that a decision to approve the development of Worwell Farmland, will further sharpen a 'thin end of a wedge' for Applications to be submitted to develop the adjacent two fields along the Cirencester Road toward the Football Club. Some people in the Tetbury community are fully aware, after accessing and reading a Cotswold District Council submitted **'Strategic housing and economic land availability assessment: New sites form'**. Here, all parties involved, residents and politicians, reading this form can easily read that there is, right now, a sharp 'wedge' of attack on this part of the Tetbury's Area of Outstanding Natural Beauty. It is not just a hunch or an irrational fear, it is both real, apparent and fully in play. The written content and narrative of the submission of this CDC Local Authority form, baldly refers to the pending decision on the Worwell Farmland, highlighting it as a precedent that will be set if Planning and Licensing Committee approves this, the first Application on the AONB.. Some of the content in the submission of this form baldly refers to the pending decision on the Worwell Farmland.
- In view of the above, the responsibility bearing down on the Planning and Licensing Committee on 14th June, is heavy. Some of us in the Tetbury Community are very aware of the weight of that responsibility for individual Members. It requires that the Committee looks over its shoulder all the way back to the Tetbury Site Assessment – February 2021, for the facts of 'high sensitivity' and 'harm'. Then Committee also must also look forward to the future and the submission of a brand new, circling, predatory interest in Strategic Housing Development ambitions, regarding the two further fields adjacent to Worwell Farm. Whilst the role of the Committee is to decide the Application in front of it, on its merits, it would be both crass and insulting to the integrity of these vital tracts of land NOT to take into account what is already professionally assessed and what we know is already under strategic consideration and coming down the tracks.

The Local NHS story

It remains an absolute truth that a Healthcare Centre can be built on almost any scruffy brownfield site and provide excellent services. However, the Worwell Farmland as landscape and biosphere, plus then the other further two fields now under strategic assessment, will never be replaced!

- From the communities perspective the local NHS Policy story of Gloucestershire Integrated Care Board and Phoenix Group has not been with out its problems. At the

outset of the Application and, certainly since early November '22, the Phoenix Group led the way in setting the tone through a Press Release which conflated, not being able to build where they wanted, with relocating Tetbury residents access to Primary Care Services to Malmesbury or indeed, twelve miles away in Cirencester. ***“If we can’t build where we are hoping to build, we are probably not going to have a premises to move to so there will be a big problem for the town. With no surgery in Tetbury, people would have to travel to Malmesbury or Cirencester.”***

- At this stage there was no Gloucestershire Integrated Care Board visible Policy or narrative to Tetbury residents. Everyone across Tetbury was exposed to the same ambiguous Phoenix Group message which some believed spoke about a consequence of vital services being relocated to Cirencester, should planning approval be denied. This early Phoenix Group, single, narrative had a considerable impact. However, it soon became visible and clear because a complaint was lodged with GICB, that the NHS GICB had a balanced Policy of providing continuity of Primary Care Services. The GICB corporate letter lodged on CDC Comments Website was part of a resolution on the complaint. The letter demonstrates the hugely divergent values, service expectations and the delivery of continuity outside an atmosphere many perceived as a threat of loss of service. Regardless of the ambiguity of the Phoenix Press Release, this is just a fact!
- Approximately 26% (possibly more following 80+ new comments posted) of a 131 Support Comments prior to the latest influx of support comments, on the CDC Comments Website refer, in different ways, to the loss of services. Many of the new ones still refer to loss of Tetburys surgery!! Indeed Tetbury Town Council, Chairperson of their Planning Committee, refers to Tetbury Town Council being ***‘aware of the consequences if this planning application is not approved as we will lose a vital service for the town.*** (Consultee Comment 29th November). Clearly the Phoenix Groups early November narrative in the Gloucestershire Live Article, whatever GICB say about the Press Release having several meanings, convinced Tetbury Town Council and the their Planning Committee enough, that they posted this comment as a belief in the consequence of service relocation, should Planning Approval be denied. These views and all the dialogues can be read on both Facebook and the CDC Comments Website.
- The reality today however, is different. The two NHS organisations are clearly now are on the same page, speaking to the same narrative. ***‘The Practice is delighted by the ICB’s commitment to work with the Practice to ensure ongoing provision no matter what the outcome of this application.....’*** (Correspondence, Mary Hutton CEO GICB 09/05/23).
- In the Application before you the Stonewood/Phoenix Application refers to the prohibitive costs of other sites as if there are no other financial equations to unlock a different solution. The truth is, however, that there are National Health Service funded initiatives and solutions all across England. Local Integrated Care Boards are, and have been, able to bid for Capital Finance set aside by National Government, designed to modernise, improve and actually build Primary Care solutions. Indeed other ICB’s have been able to invest Capital monies in either building or indeed developing existing

buildings! The underlying claim is that the development of Primary Healthcare in Tetbury relies on a landowners GIFT of vital, AONB landscape, having been offered on sale for £1.00. The NHS is, however, well funded. It can avoid this cap in hand approach to the development of services and destruction of highly sensitive land. The landowners 'give away' comes at a significant and unacceptable price! A price of damage; landscape damage; environmental damage; damage to our biodiversity. However, by contrast the landowner and the developer, through building 27 houses and a Healthcare Centre on this site, will benefit considerably. Surely the development of Primary Care Services in this fifth richest wealthy Nation in the world does not rely of a gift of land within our AONB?!(See below)

The Primary Care System Development Funding (SDF) programme.

Please find below an NHS system for ICB's to bid for development funding:

These are some examples of what capital developments could fund include:

- a. new consulting and treatment rooms to provide a wider range of services for patients so more people can be seen;
- b. improved reception and waiting areas;
- c. building new facilities to deal with minor injuries;
- d. creating better IT systems to improve the way information is shared between health services in the area;
- e. extending existing facilities to accommodate a wider range of health staff – including GPs, nurses, clinical pharmacists and PCN staff funded through ARRS;
- f. building new health centres which have a greater range of health services for people in one place.

Examples (e) & (f) shows us that building a Healthcare Centre on green belt or AONB, in exchange for 27 houses does not have to be the only financial equation to answer Tetburys needs for new premises. Our local NHS GICB as an 'Integrated' organisation can collaborate with other stakeholders to create and support buildings and services in Tetbury without having to destroy our land heritage!

Capital funding for '22/'23 is available through NHSE Regions

It true that now, through a recent public commitment from Gloucestershire Integrated Care Board and the Phoenix Group, that they have finally joined together to provide a belt and braces commitment to a bridgehead of continuing access to Primary Care Services irrespective of CDC Planning and Licensing Committee decision. The early anvil on which the Committees decision rested seemed to be a choice between losing a chunk of the AONB or losing its Primary Care Service to the whole Tow is DEAD. Now, then, Committee has an opportunity to create breathing and thinking space, to consider other options and all other options for bidding for Capital and Revenue Finance to buy Development of services elsewhere.

Conclusions

Some of us who have travelled the full distance of this Application can remember the broad impacts of the Phoenix Group Press Release narrative that sprang up between residents online, in CDC Comments Website postings and for politicians.

Some of those early impacts were seen in:

- The expectation that the Romney House lease would expire in January 2025.
- That if the Application was not approved this could result in Primary Care Services being relocated. Possibly as far as 12 miles.
- There was clearly an impact on the towns political process with a Tetbury Town Council posting clearly posting a comment and belief that vital services could be lost to the Town.
- At the last Planning and Licensing Committee, while discussing the site visit, the Councillor for Tetbury intervened to remind the meeting of the urgency in regard to Tetbury standing to lose its Surgery.
- More recently from a Community perspective we still hear echos of the Phoenix Press Release threatening dire warnings, should Committee on 14th June not give Planning Approval. The landowner has recently has been threatening that the service could end up in portacabins, while another official has reminisced about his experience of Primary Care Services ending up in a chip shop. These are crude scare tactics designed make us focus on the Worwell Farmland as the 'only option'!

Regardless of dire warnings it is GICB's and Phoenix Groups responsibility to provide services of high quality. The Care Quality Commission will continue to inspect the Tetbury Primary Care Service and GICB will need to continue to invest in it, wherever it is based.

Romney House Surgery can create a temporary bridgehead

It is a fact that Romney House Trust remains a definite option to provide Primary Care Services. They are reported by GICB as 'amenable'. Romney House is not a 'portacabin' and not a 'chip shop', it's a perfectly acceptable contingency plan which maintains the status quo.

The following statement below made by Mary Hutton, CEO GICB, in response to a formal complaint, demonstrates how far the situation has changed. Indeed the whole narrative about relocation and urgency between local NHS Commissioners and the Provider, Phoenix Group is markedly different. They are now fully committed to continuity of service. Also, the Romney House Trust are said by GICB's CEO to be 'amenable' to a lease extension beyond January '25.

"It is important to note that by the time of the Business Case submission towards the end of February 2023, further dialogue had taken place between the Practice and their Landlord. Whilst the new leases can be terminated by the Landlord from January 2025, they have confirmed that they are amenable to extending the lease beyond this date. This is of course subject to detailed commercial negotiations and is not guaranteed. Consequently, the Practice will issue an updated statement via the CDC Planning Portal in due course.

“As you know from previous correspondence, whilst we have approved Business Case funding, if the planning application for the preferred site is not approved, the development of Primary Care facilities in Tetbury would remain a key priority. We would continue to work with the Practice to deliver a new purpose built primary care facility for the Town.”

In view of this changed environment today, there is no fearful false binary decision, there is strong and clear assurance in continuity of service, therefore it is completely possible that Committee could create a space in which Tetbury stakeholders work together. GICB and Phoenix Group have taken responsibility for providing and maintaining quality of service within the Romney House contingency plan.

GICB Commissioners, their Engagement Team and stakeholders and residents could, if the Committee's decision was well made, be passed the responsibility to work together to find a robust, creative solution for a new Surgery on a far less destructive site.

They can choose, on behalf of the community, bid for new significant NHS Development monies and deploy existing budgets to provide a service from either an existing building, or a new building, all without destroying the Worwell Land or setting a precedent to two further fields adjacent, to be destroyed with it.

COMMENT 2

I had previously emailed members of the planning committee with my objections to the Worwell speculative development (see previous email), however given more recent information and new members to the committee I wanted to provide additional comments for your consideration.

The latest information from GICB is that Tetbury will NOT lose its doctors surgery should this speculative development not be approved and that the current Romney House lease is amendable beyond the current 2025 maturity. As such the narrative of this being last chance saloon or Tetbury will lose its surgery is entirely false and the burden of the proposed development offering greater benefit than harm no longer holds true (burden placed on the development given it is outside the development boundary). Surely the CDC planning officers must now apply the policy of sequential testing vigorously; as a reminder Harrison Bowley states in his report that "Officers are not satisfied that the sequential tests have been conducted thoroughly or transparently". The SHELAA identifies at least three other more appropriate sites for the surgery, one being the Redrow / Blue Fox Planning site, while concluding that NO PART of Worwell Farm is suitable for allocation in the local plan. as per the submission by Blue Fox planning on the portal, they indicate that they had been working with Phoenix Surgery for over FIVE years to deliver a surgery for Tetbury, however Phoenix reduced engagement which a cynic could argue coincided with the offering of 'free' land from the Worwell Farm landowner.

Another question that needs to be asked is who is more financially capable of delivering a fully functioning surgery for Tetbury. On one hand you have Stonewood Properties who by all accounts is a small, local developer who I don't believe has previously built a doctors surgery. According to Companies House, Stonewood Properties Limited in the twelve months to 30th

September 2021 (last financials published) reported revenues of £66.3m and a before tax LOSS of £1.2m. This compared to Redrow PLC (as an example of an alternative site) reported FY22 revenues of £2.14bn and before tax profit of £410m. According to consultants employed by Phoenix the build cost will exceed £6m. If the council is serious about delivering a surgery for Tetbury, surely the financial capacity to deliver is a consideration!?.

I urge members of the planning committee to be true to the CDC pledge of 'Green to the Core' by protecting green belt land from speculative development as well as upholding the integrity of the planning process by not allowing this clear attempt to buy planning through underhanded tactics including the peddling of a false narrative that Tetbury will lose its surgery if this housing development is not approved.

COMMENT 3

We are contacting you with regards to the planning application for development at Worwell Farm, Tetbury. We have contacted the planning committee previously to make our opposition to the proposed development clear.

The land in question is a greenfield site outside Tetbury's development zone situated in an area of outstanding natural beauty. It is clear that if the application was purely for housing it would almost certainly be rejected. The "promise" of a new surgery has been included as a "lever" or "inducement" in a clear and cynical attempt to influence the planning committee and circumvent planning guidelines. The applicants have pursued a campaign of false information on social media claiming that if the application is rejected Tetbury will be left without a surgery; as we stated in our previous communication this untrue. The latest tack is that if the application is rejected the people of Tetbury will be forced to see the doctor in a portakabin. Whilst in reality this would be no hardship as a temporary solution, it is extremely unlikely as the lease on the current surgery does not expire until 2025 and the property's owners are amenable to extending it.

The proposed site is a wildflower meadow and on a recent visit to Highgrove we learned the shocking statistic that since the end of World War II England has lost 99% of its wildflower meadows. It would be a tragedy if some of the remaining 1% were lost because of this unnecessary development.

The builders Redrow have proposed an alternative development which includes a new surgery. This development, unlike that proposed for Worwell Farm, would include a nature reserve, a children's nature play area and extensive tree planting. The Worwell development would necessitate the complete eradication of a wildflower meadow and the wholesale felling of a number of mature and established trees.

Nobody denies that Tetbury needs a new surgery but not immediately and not at any cost. Please reject this application which, as previously stated, is nothing more than a cynical, manipulative and mercenary attempt by a property speculator to circumvent planning guidelines for purely financial gain, those guidelines are in place to protect the countryside for the good of the environment and the benefit and enjoyment of future generations.

COUNCILLOR CHRIS TWELLS

TETBURY WITH UPTON WARD

Sent by email to the Chair of Cotswold District Council's Planning & Licensing Committee

Monday 12th June 2023

Ref: 22/03495/FUL - Land West Of Worwell Farmhouse, Cirencester Road, Tetbury Upton

Dear Councillor Brassington,

I regret that, due to a prior commitment, I am unable to attend the meeting on Wednesday 14th June to speak as the District Councillor for Tetbury with Upton concerning the above application. Many residents have contacted me with their concerns about the proposal (22/03495/FUL) and I would be grateful if my comments below, as Ward Member, could be noted by the Committee.

I am writing to object in the strongest form to the proposed development at Worwell Farm in Tetbury/Tetbury Upton. This development has been controversial from the start given the perceived underhanded nature of a landowner and developer playing on the highly emotive topic of a new surgery in Tetbury. My objection to the proposed development is both in terms of a contravention of planning policy and the failure to adequately consider other sites that were deemed more appropriate by the 2021 SHELAA report.

Firstly in terms of policy, the proposed development would contravene the following policies; Policy DS4 which prohibit new-build open market housing outside of development boundaries, Policy EN4 The Wider Natural and Historic Landscape, Policy EN5 The Cotswold Area of Outstanding Natural Beauty and EN10 that require great weight to the conservation of heritage assets.

I would remind the Committee that on 7th July 2021, an earlier proposal for 25 houses and a new surgery on this site was given short shrift by CDC:

"Officers appreciate the urgent need to secure a site for the provision of a new doctors' surgery. Whilst the site proposed is considered to be sensitive in terms of the setting of the Tetbury Conservation Area and the character and appearance of the AONB...the principle of residential development of approximately 25 dwellings on this site that is outside of the Development Boundary would be contrary to Local Plan Policy DS4 and therefore would not be supported were a formal planning application to be submitted".

The note also made the following comments which is relevant for the current submission; "Any application would also need to robustly demonstrate that there are no other suitable, less sensitive, and possibly more accessible, sites that could accommodate a surgery...Any future planning application would need to provide a more detailed explanation of the unsuitability or unavailability of all the sites considered". The planning officer in his summary recommendation stated "that other options exist and the sequential test conducted has not adequately demonstrated that this constitutes the only viable site for the proposed services". The developer has failed in the sequential test and as outlined by the SHELAA and forward planning officers statement there are at least three other sites that are more appropriate for the doctors surgery

Tetbury Site Assessments: Strategic Housing and Economic Land Availability Assessment (2021). The report assessed 77 locations as possible locations for a new surgery, it was concluded that three locations were suitable, namely the Northfield Garage site, Highfield Cottage site and the Hampton Street Site. In terms of the Worwell farm site, the report determined that *"There is a longstanding need for a doctor's surgery in Tetbury but the constraints on this site are such that it would be difficult for the benefits of providing a new surgery to outweigh the harm that would result from development in this location...No part of this site is suitable for allocation in the Local Plan at the present time."*

Further findings were that the landscape has a HIGH sensitivity, it falls within a Source Protection Zone (Worwell is one source of the Tetbury Avon) and is a Red Zone for Great Crested Newts - further reports have shown that a pond within two hundred metres of the site is a GCN breeding location.

Conservation Officers Report: The author of the report submitted as part of the proposal noted that the development site would have 'very marked impact' on the approach to the town and conservation area. The architectural design was described as "giving little concession to the either the wider character of the district or of the prominent rural nature of the site", while the proposed medical centre was described as taking the form of a large industrial shed that was "more akin to an industrial estate or business park". The officer concludes that "If the public benefit is considered to outweigh the very real harm fundamental changes to both the layout and the architectural design of the buildings are required". Despite the very critical report produced by the Conservation and Design Officer, minimal changes to the plans have been proposed resulting in the officer providing a follow up statement concluding "despite the modest changes, my overall previous comments still stand. Even if the harm of development in principle on this site would be outweighed by public benefit that would accrue from the proposed medical centre, the design of this development should follow the Design Code & be appropriate & sympathetic to its context (which would not preclude sympathetic, high-quality contemporary design)."

Forward Planning Response (9th December 2022): The consultant notes that the application site is contrary to policy DS4 and that CDC is current at 120% of Housing Delivery test, therefore he "in-principle objection to 27 dwellings in this location". The officer also noted the CDC local plan mantra of being 'Green to the core' and that the site had been deemed unsuitable in the 2021 SHELAA, concluding that "The site would therefore not be recommended for allocation in the Local Plan for residential Development".

As outlined above, the proposed application has been declined or requested to have material changes to be considered by several CDC officers and consultants. The proposal has not materially changed from the initial submission and do not address the real concerns raised by numerous officers and consultants employed by CDC to give independent opinions on planning applications. To ignore these reports and opinions would undermine the District Council's own policies and the entire planning process under English law.

As referenced above, the SHELAA identified three suitable locations for the surgery and Worwell Farm was not one of the three. The Planning Officer states that the sequential test on these sites was inadequate. *"Officers are not satisfied that the sequential test has been conducted thoroughly or transparently, with the application's supporting information lacking details of the considerations made"*.

Finally, the approval of this application puts surrounding green space at risk of further development. The forward planning officer identifies this in the his response to the planning officer stating "granting planning permission to the current application will make further land to the south of the application site more susceptible to development". A new site form has been submitted to the forward planning officer for this land already, further showing that the current speculative development proposal is part of a deliberate campaign by the landowner to develop all the remaining open green space in the Cirencester Road corridor.

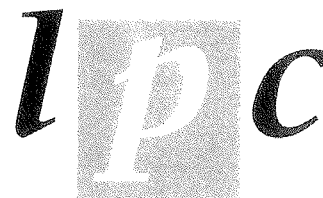
Yours faithfully,

Councillor Chris Twells

12th June 2023

Our Ref: ADM.LPC.5009

Hannah Rose, Senior Planning Officer,
Development Management
Cotswold District Council
Trinity Road
Cirencester
GL7 1PZ



TOWN AND
COUNTRY
PLANNING
DEVELOPMENT
CONSULTANTS
ESTD 1988

Dear Ms Rose,

**Planning application at The Tunnel House Inn, Tarlton Road,
Coates, GL7 6PW – Application No: 21/03698/FUL**

Further to our recent exchanges of emails in respect of the above application, I am writing to address some of the matters that have arisen subsequent to the Site Visit by the members of the Planning Committee.

Location of the Accommodation Units

A resident of Tarlton who spoke at the last Committee Meeting suggested that the proposed accommodation units be located to the rear of the Inn, rather than on the application site. The reason why her suggested location was not sought was due to biodiversity concerns, the applicant's ecologist advising that this was a sensitive location, being ancient woodland containing numerous protected species of flora and fauna. In support of this, I would refer you to the Biodiversity Report that was submitted during the application and the plan to its rear, which shows that protected wildlife is found within that woodland of high ecological value.

You enquired why the clearing to the east of the Inn had not been chosen for the units. This was because that area is the only one suitable for the car park, it having been used for that purpose for over 50 years as it is close to the access drive. There would be no other area suitable for parking. In addition, that area of land is close to the listed tunnel entrance, the setting of which should be preserved, and would obscure the front of the Inn, a non-designated heritage asset.

With the field to the southwest representing part of the setting of the Scheduled Ancient Monument, the only other option was to propose the accommodation units on the area of spoil excavated from the construction of the canal, within the wooded bank.

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The Accommodation Units

Concerns were expressed at the last meeting about the hot tubs that have been proposed. In view of this, the applicants have decided to omit them and attached are revised drawings to this effect.

You mentioned that there has been a recent objection referencing the kitchenettes with the units, which came as a surprise to me as these were omitted from the revised drawings that were submitted to Mike Napper on 29th July last year. The drawings shown in the Committee reports were not, therefore, the most recent ones sent to your Council. I sent you copy correspondence in this regard earlier. The revised drawings that are attached omit the hot tubs that were proposed in five of the units, with the sixth not intended to have a hot tub. They also show no kitchenettes, the intention being that all meals are taken in the Inn, including breakfast, although this could be delivered to the units just like room service in a hotel. The aim of this application is to provide serviced accommodation associated with the Inn.

The most recent objection also states that the units are too large and should be smaller, along the lines of those originally submitted. It alleges that the officers would not be recommending consent for this scheme had the original scheme not been for small pods. This is the only application that has been submitted at this site, it has been through a number of design changes to satisfy the Conservation Officer and other specialist officers, to the extent that Mike Napper said at the previous Committee meeting that this proposal does not cause any harm, a comment that is not minuted but was clearly stated by the officer.

Another matter that was raised was the containment of the occupants of the units to prevent them straying into the surrounding area to sit out and have a picnic or barbeque. Management controls will be put in place to prevent such activities and Mr Napper stated that a condition of planning permission could be imposed in this regard.

Conclusions

With the specialist officers considering that there would be no harm arising from this proposal, I trust that the Committee site visit has confirmed that this application, aimed at returning the Tunnel House Inn to a viable hostelry, will be granted permission, thereby representing a public benefit to the local and wider community.

Yours sincerely,

Andrew Miles
LPC(Trull) Ltd

