

Dear Councillors,

We are writing to you on behalf of Friends of Winchcombe, a highly regarded and local organisation with hundreds of paid members.

We would like to draw your attention to the sections related to Winchcombe in the recently-published TBC Draft Local Plan which the Council will be considering on Tuesday, 10th February.

The TBC Draft LP picks up sites that have been included in the draft Winchcombe & Sudeley Neighbourhood Plan which has recently been presented for public consultation. There is sufficient lack of clarity around the true opinion of Winchcombe for a decision to be made at this junction.

We are writing to ask you **not to** support the site options in relation to Winchcombe this section of the TBC Draft LP for the following reasons:

- The only site options shown for Winchcombe are **all** sites within the AONB around Winchcombe. The NPPF states that Areas of Outstanding Natural Beauty, like National Parks, are the highest level of designation & have the highest level of protection.
- The ideas that have been proposed are developer led proposals and not those supported by the local community.
- The NPPF states that Areas of Outstanding Natural Beauty, like National Parks, are the highest level of designation & have the highest level of protection.
- The selection breaches certain paragraphs of the National Planning Policy Framework, link here: (in particular paragraphs 115 & 116 on pages 32 & 33) https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf
- We believe that due weight has not been given to NPPF paragraph 14, footnote 9 (page 10) — specific policies in this Framework indicate development in an Area of Outstanding Natural Beauty should be restricted.

I would also like to ask you to also give extra careful consideration to one site in particular. The farm land around Almsbury Farm, This area is highly regarded by locals and tourists alike and is part of the historic approach to Sudeley Castle.

Assumptions made in the Winchcombe Draft NP about this site are misleading. For example:-

- Previous planning consent on Almsbury Farm, The Farm is a family home and agricultural buildings and not a brown field site that has been described. Planning consent for a garden centre (with many restrictions) was within the farm buildings and not on surrounding fields.
- In the Tewksbury Landscape Assessment report, building on this 'east' side of the river Isbourne is outside the natural settlement edge and completely inappropriate.

- Being both in the Conservation area and AONB there is no requirement either from the NPPF or the JCS for us to be promoting large scale development in the heart of our tourist area.
- The Winchcombe plan also lies that there is a moderate beneficial landscape effect in developing on this field when actually what was identified in the Winchcombe Landscape Assessment relates predominantly to the potential improvements to the farm buildings and farm yard and their consequent effect upon the general condition and appearance of the area.
- In the past 6 years TBC and local highways made a major investment to reduce the flood risk in Castle Street and beyond. While the proposed development site is not in the flood zone, even with mitigations its location between the two rivers will have a knock on effect to properties downstream where homes risk considerable damage and risk to life.

Please also refer to the section below on page 27 of the TBC draft local plan; We believe this site is in clear breach of these guidelines.

5.10 The internationally or nationally designated environmental constraints are:

Table 3.1 International/National Environmental Policy Constraints	
Is the site outside of the AONB	NPPF:115 great weight should be given to conserving... AONB
Is the site outside of nationally designated historic assets? (Designated battlefield, scheduled monuments, Grade I and II* listed buildings and historic parks/gardens)	NPPF:132 substantial harm or loss... should be wholly exceptional
Is the site outside flood zone 2 or 3?	NPPF:100 direct development away from areas at highest risk. Apply a sequential and risk-based approach to the location of development.
Is the site outside of internationally/nationally designated nature conservation sites? (SAC/SPA/SSSI/Ramsar Site)	NPPF:113

5.11 In the first instance land designated as any of the above was sieved out of the site selection process. These designations constitute those having greatest weight in terms of conserving/preserving/avoiding adverse impacts.

We believe that there are alternative sites for development in Winchcombe outside the AONB which should receive full consideration first and would be more suitable for any required development (bearing in mind the large amount of development currently underway in Winchcombe).

While we appreciate you are unable to comment under the rules governing impartiality but we would ask you to consider the points we raise & look at the link & references.

We would ask you to please give serious consideration to the points we raise prior to the vote which will take place on Tuesday.

Yours faithfully,

Chair, Friend of Winchcombe

councillor.allen@teWKesbury.gov.uk
councillor.awford@teWKesbury.gov.uk
councillor.berry@teWKesbury.gov.uk
councillor.bird@teWKesbury.gov.uk
councillor.blackwell@teWKesbury.gov.uk
councillor.bcalway@teWKesbury.gov.uk
councillor.carter@teWKesbury.gov.uk
councillor.davies@teWKesbury.gov.uk
councillor.day@teWKesbury.gov.uk
councillor.dean@teWKesbury.gov.uk
councillor.east@teWKesbury.gov.uk
councillor.evetts@teWKesbury.gov.uk
councillor.healy@teWKesbury.gov.uk
councillor.hesketh@teWKesbury.gov.uk
councillor.hillier-richardson@teWKesbury.gov.uk
councillor.jones@teWKesbury.gov.uk
councillor.keyte@teWKesbury.gov.uk
councillor.mackinnon@teWKesbury.gov.uk
councillor.mactiernan@teWKesbury.gov.uk
councillor.mason@teWKesbury.gov.uk
councillor.ogden@teWKesbury.gov.uk
councillor.perez@teWKesbury.gov.uk
councillor.perezv@teWKesbury.gov.uk
councillor.ricks@teWKesbury.gov.uk
councillor.shurmer@teWKesbury.gov.uk
councillor.silverthorn@teWKesbury.gov.uk
councillor.smithv@teWKesbury.gov.uk
councillor.stokes@teWKesbury.gov.uk
councillor.surman@teWKesbury.gov.uk
councillor.sztymiak@teWKesbury.gov.uk
councillor.tugwell@teWKesbury.gov.uk
councillor.vines@teWKesbury.gov.uk
councillor.waters@teWKesbury.gov.uk
councillor.whelan@teWKesbury.gov.uk
councillor.williams@teWKesbury.gov.uk

councillor.workman@teWKesbury.gov.uk
councillor.wright@teWKesbury.gov.uk