

Gotherington Parish Council Response to Bishop's Cleeve Parish Council's Community Governance Review Proposal

1. Overview

Gotherington Parish Council have been notified by Tewkesbury Borough Council of a submission made by Bishop's Cleeve Parish Council proposing a change to the parish boundary between Bishop's Cleeve and Gotherington, under which a significant area of land currently within Gotherington Parish would instead fall within Bishop's Cleeve. The two maps in Appendix A, taken directly from BCPC's submission, show the extent of the proposed change.

Gotherington Parish Council does not support the proposed boundary change. The reasons for this position are set out below.

Part A: Adopted Policy Position

2. Tewkesbury Borough Plan 2011-2031: Gap of Local Importance (Policy LAN3)

Policy LAN3 designates the land between Bishop's Cleeve and Gotherington as a Gap of Local Importance. The policy states:

"The council will protect the Gaps of local importance identified on the Policies Map to help retain the separate identity, character and/or landscape setting of settlements and prevent their coalescence." (p.104)

LAN3 requires that development within the Gap must not significantly harm the open or undeveloped character of the land, the separate identity and character of the settlements or their landscape setting.

The Reasoned Justification explains that Gaps of Local Importance are needed to protect settlements from development pressures that could erode their identity or reduce separation. It also warns that without this added protection there would be a risk of gradual incremental development and potential coalescence where the gap is narrow.

The proposed boundary change conflicts with LAN3 because it would reduce the separation between the settlements and harm their landscape setting.

The Strategic Gap Map accompanying Policy LAN3 in the Tewkesbury Borough Plan (page 3 of the Strategic Gap Maps) illustrates the designated separation between Bishop's Cleeve and Gotherington. It shows that the land subject to the proposed boundary change lies within this mapped Strategic Gap. The same map also identifies the LAN1 Special Landscape Area, marked with a yellow dashed boundary, which forms part of the wider landscape setting referenced in adopted policy. For ease of reference, a copy of this map has been provided in Appendix B of this response.

3. Joint Core Strategy Policy SD6: Landscape

Policy SD6 requires development to protect landscape character for its intrinsic beauty and for its economic, environmental and social value. It states that proposals must:

“protect or enhance landscape character and avoid detrimental effects on types, patterns and features which make a significant contribution to the character, history and setting of a settlement or area.” (p.63)

SD6 requires all development proposals to consider landscape and visual sensitivity and to avoid harm to the features that contribute to the setting of a settlement.

SD6 reinforces the importance of retaining the existing Dean Brook boundary. The proposed boundary change is not consistent with this policy and would undermine the landscape protection required by the Joint Core Strategy.

4. Landscape and Visual Sensitivity Study (LVSS)

The LVSS for Rural Service Centres and Service Villages provides the technical evidence that underpins the Gap of Local Importance designation. It assesses parcels Bish 01 and Goth 01 and identifies them as highly sensitive to development.

The Tewkesbury Borough Plan summarises these findings in the Reasoned Justification to LAN3, stating that the land between Bishop’s Cleeve and Gotherington:

“is overlooked from elevated vantages including national trails, popular viewpoints and the heritage railway, and finds the parcel to be of high visual sensitivity due to its important role in separating Bishop’s Cleeve from Gotherington.” (p.105)

This confirms that the land performs an essential separation function. Any change that reduces this separation would conflict with both the LVSS evidence and the purpose of the Gap of Local Importance.

5. Gotherington Neighbourhood Development Plan (GNDP)

The GNDP sets out a clear vision:

“A Neighbourhood Development Plan that ensures Gotherington will continue to thrive, meeting the changing needs of the community whilst preserving the distinctive character, landscape and setting of the village.” (p.25)

The GNDP also states:

“Future new development shall not encroach upon the land that separates Gotherington from Bishop’s Cleeve and Woolstone.” (p.17)

Maintaining Gotherington’s rural character and preserving the land that separates it from Bishop’s Cleeve are central objectives of the GNDP. The proposed boundary change is not consistent with these objectives.

6. Existing covenant and strategic intent to maintain parish separation

The covenant relating to land at Homelands Farm (see Appendix C) provides clear evidence of the long-standing intention to maintain separation between Bishop’s Cleeve and Gotherington. The covenant does not suggest that parish transfer would automatically cause the two settlements to merge, but it demonstrates that this land has already been subject to formal, enduring measures to prevent policy-level merger – that is, the erosion of Gotherington’s distinct identity, governance and rural setting.

The covenant was entered into because the landowners agreed that development on this land should not “cause the parishes of Bishop’s Cleeve and Gotherington to merge”, and that its rural and open aspect should be preserved. This directly contradicts Bishop’s Cleeve Parish Council’s assertion that the land “naturally aligns” with Bishop’s Cleeve or should fall under its governance. The covenant confirms the opposite: that the land’s purpose, planning context and community interest lie in maintaining separation and supporting Gotherington’s distinct parish identity.

The covenant binds successors in title and is supported by a Land Registry restriction requiring future owners to enter into the same obligations. This demonstrates a deliberate and long-term strategic intention to preserve the rural gap and prevent governance-level coalescence. It aligns with the Strategic Gap (LAN3), the settlement hierarchy and the wider planning framework, all of which recognise the importance of maintaining separation between the two communities.

Part B: Community identity, character and facilities

7. Community identity

Gotherington is a rural village with a distinct identity, landscape setting and pattern of development. The proposal does not demonstrate a change in community identity that would support a boundary alteration.

As at the date of this response, the Parish Council has received 48 written representations supporting retention of the existing boundary. This level of engagement is particularly significant given the limited period available for residents and the Parish Council to become aware of, consider and respond to the proposal following notification of the Community Governance Review.

Collectively, these representations demonstrate a strong and consistent identification with Gotherington as a distinct community and widespread support for maintaining the existing separation between Gotherington and Bishop’s Cleeve. Many residents specifically reject the assertion that the land subject to the proposal is locally perceived as forming part of Bishop’s Cleeve. A recurring theme within the representations is that the land plays an important role in maintaining the separate identity, character and setting of Gotherington, and that residents continue to regard the existing Dean Brook boundary and strategic gap as important and meaningful features separating the two communities.

The Council considers these representations to be direct evidence of current community identity and local opinion, both of which are central considerations within a Community Governance Review. The representations are provided separately at Appendix D.

8. Gotherington’s facilities and community infrastructure

Gotherington’s recognised role within the adopted planning framework reinforces the case for retaining the existing parish boundary. The Gloucester, Cheltenham and Tewkesbury Joint Core Strategy identifies Gotherington as one of the area’s designated “service villages”, reflecting its function as a self-contained rural settlement providing day-to-day facilities and community infrastructure to a wider catchment. This designation confirms that Gotherington operates as an independent rural community with its own established service base. The service village role

depends on maintaining Gotherington's distinct identity and landscape setting, both of which would be undermined by reducing the physical separation between Gotherington and Bishop's Cleeve.

The submission suggests that new residents north of the A435 would rely primarily on facilities in Bishop's Cleeve. This does not reflect the reality of community life. Gotherington itself provides a wide range of amenities used by residents from across the local area, including Bishop's Cleeve, Woolstone, Oxenton and other nearby settlements. Facilities include the primary school, tennis courts, playing fields, football pitch, cricket pitch, the Old Chapel, Village Hall, Rex Rhodes Building, Pavilion, community orchard, pub, post office and village stores, Hedgehog Trail, Gotherington Nurseries, Gotherington Cross Garage and local businesses such as a dog groomer.

The village also hosts an extensive network of active clubs and groups, many of which are at capacity and have waiting lists. These include Brownies, the Cricket Club, Gardening Club, Gotherington Singers, GOWNS, football clubs, the Local History Group, Men's Shed, Nature and Wildlife Group, parent and toddler group, Petanque Club, Scouts, Tennis Club, Under Fives and After School groups, and the Wine Club.

Participation in these groups is not limited to parish residents; many members come from neighbouring settlements, including Bishop's Cleeve. Their popularity demonstrates that Gotherington is not dependent on Bishop's Cleeve for community provision and that the village functions as a community hub in its own right.

This reciprocal pattern of facility use is longstanding and healthy, but it does not justify altering parish boundaries. Community facilities do not operate on a parish-exclusive basis, and cross-boundary participation is normal. The argument that new residents would use Bishop's Cleeve facilities exclusively is not supported by evidence.

The 2026 Gotherington Community Survey further demonstrates strong identification with the parish, with residents emphasising the importance of maintaining Gotherington's distinct rural character, governance arrangements and community infrastructure. This reinforces the evidence of a cohesive and self-contained community of interest.

9. Previous Community Governance Review conclusions

A materially similar proposal has previously been considered by Tewkesbury Borough Council during the 2021/22 Community Governance Review.

At that review, Bishop's Cleeve Parish Council proposed an alteration to the boundary between Bishop's Cleeve and Gotherington. In considering that proposal, Tewkesbury Borough Council concluded that the existing boundary along Dean Brook represented a strong and clearly identifiable boundary which provided effective and convenient local governance within Gotherington Parish.

The Executive Committee report noted concerns that altering the boundary could create pressure for future expansion which, over time, could contribute to the erosion of Gotherington Parish and its separate identity. The review ultimately recommended that no changes be made to the existing boundary between the two parishes.

Gotherington Parish Council considers these previous findings highly relevant. The proposal currently under consideration advances many of the same arguments that were previously examined, including references to future development and relationships with facilities in Bishop's Cleeve. However, the present proposal seeks a substantially larger transfer of land than that considered during the 2021/22 review.

Where a principal authority has previously determined that the existing boundary provides effective and convenient local governance, and that no alteration is necessary, it is reasonable to expect clear evidence of a material change in circumstances before reaching a different conclusion. Gotherington Parish Council is not aware of any such change in community identity, governance arrangements or physical geography that would justify departing from the conclusions reached during the previous review.

The findings of the 2021/22 Community Governance Review therefore provide further support for retaining the existing boundary.

Part C: Further comments regarding points made in BCPC's Submission

10. Alleged local perception and developer marketing

BCPC claims that the land is locally perceived to be part of Bishop's Cleeve and that developers have repeatedly described it as such. They argue that this perception will strengthen once new dwellings are occupied.

Developer marketing material does not determine parish identity, parish governance or statutory boundaries. Developers frequently describe sites by reference to nearby larger settlements for commercial reasons. This does not change the legal boundary, nor does it demonstrate a change in community identity. The Community Governance Review must be based on evidence, adopted policy and the statutory criteria in the Local Government and Public Involvement in Health Act 2007. Marketing material is not part of that framework. The existing boundary is long established, clearly defined by Dean Brook and supported by adopted planning policy including LAN3, SD6 and the Gotherington Neighbourhood Development Plan.

11. HELAA site codes

BCPC states that HELAA site codes BIS016A and BIS016B show that parts of Gotherington are identified as being in Bishop's Cleeve.

HELAA site codes do not define parish boundaries. HELAA is a technical land availability exercise and groups sites by the nearest settlement for assessment purposes. The HELAA guidance itself states that inclusion of land "has no planning weight" and "does not determine whether a site should be granted planning permission or allocated." HELAA labels do not alter parish boundaries, do not indicate community identity and do not override adopted policy.

Further, the proposed boundary cuts directly across land identified in the HELAA as potentially developable in the long term. While HELAA carries no planning weight in itself, it is a technical evidence base used to understand broad development capacity around settlements.

Splitting a single HELAA-assessed land parcel between two parishes would create an incoherent governance arrangement for any future masterplanning exercise. If large-scale development were ever proposed on this land (as has been discussed in previous strategic

planning rounds), the result would be a divided site with two parish councils responsible for different parts of the same new community.

A boundary that bisects a potential strategic site would undermine effective and convenient local governance, contrary to the statutory criteria for Community Governance Reviews.

12. Precept and CIL arguments

BCPC argues that new residents would use Bishop's Cleeve facilities and therefore should contribute to their upkeep through the Bishop's Cleeve precept. They state that it would be inequitable for Gotherington to receive precept and CIL from development while Bishop's Cleeve maintains facilities used by new residents.

Facility use does not determine parish boundaries. Parish precepts are not allocated on a "user pays" basis. Residents routinely use facilities in neighbouring parishes. The Local Government Boundary Commission guidance is clear that financial considerations such as precept distribution must not drive boundary changes. CIL is allocated according to statutory regulations and is not a mechanism for redrawing parish boundaries. The correct approach is partnership working between parishes, not boundary alteration.

13. "Inevitable further development"

BCPC states that inevitable further development will occur on this land and that this future development justifies altering the boundary.

Assumptions about future development cannot justify boundary change, particularly where adopted policy seeks to prevent development that would erode settlement separation. The land lies within a designated Gap of Local Importance and within parcels identified as highly sensitive in the Landscape and Visual Sensitivity Study. Policy LAN3 explicitly seeks to prevent incremental development that would erode separation between settlements. The Community Governance Review cannot be based on speculative development scenarios.

14. Ward boundaries and councillor numbers

BCPC proposes increasing councillor numbers and ward boundaries within Bishop's Cleeve Parish Council and suggests that this would be easier if the boundary were changed.

These matters relate solely to Bishop's Cleeve's internal governance and do not justify altering the boundary with Gotherington. Tewkesbury Borough Council can review Bishop's Cleeve's warding arrangements and councillor numbers independently of any boundary change. Boundary changes must be justified on community identity and effective governance. Internal warding arrangements within Bishop's Cleeve do not meet that threshold.

In summary, none of the points raised meet the statutory criteria for altering parish boundaries. The arguments rely on developer marketing, HELAA labelling, speculative development assumptions and facility use patterns, none of which form part of the legal test for boundary change. The adopted policy framework consistently supports retention of the current boundary.

Part D: Accuracy and process

15. BCPC submission accuracy and consultation process

As set out in Part C, we have identified statements within the submission that appear inconsistent with Gotherington Parish Council's records or understanding. Gotherington Parish Council requests that any assertions relied upon in the submission be evidenced clearly before they are considered.

BCPC submitted its proposal without consulting Gotherington Parish Council. The proposal directly affects Gotherington's identity, landscape setting and designated policy areas. Early engagement is essential for any governance change of this scale.

The absence of consultation has resulted in assumptions which are not supported by evidence.

16. Conclusion

Gotherington Parish Council does not support the proposed boundary change. The evidence set out above shows that the submission from Bishop's Cleeve Parish Council does not meet the statutory criteria and is not supported by adopted policy, landscape sensitivity work or the Gotherington Neighbourhood Development Plan. The land forms part of the Gap of Local Importance and plays a clear role in maintaining separation between the settlements.

Nothing in the submission demonstrates a change in community identity or any governance benefit that would justify altering a long-established boundary.

The proposal also does not reflect how the community functions in practice. Gotherington provides facilities and groups used by residents from several neighbouring parishes, and shared use of amenities is normal and longstanding. The arguments put forward rely on developer marketing, HELAA labels, assumptions about future development and Bishop's Cleeve's internal warding matters, none of which form part of the legal test. The submission was made without consultation with Gotherington Parish Council, which has led to statements and assumptions that are not supported by evidence.

For these reasons, Gotherington Parish Council strongly supports retention of the existing boundary.

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Appendix A: Extracts from Bishop’s Cleeve Parish Council’s submission showing the proposed boundary change (Figures 1 and 2: existing boundary and proposed boundary)

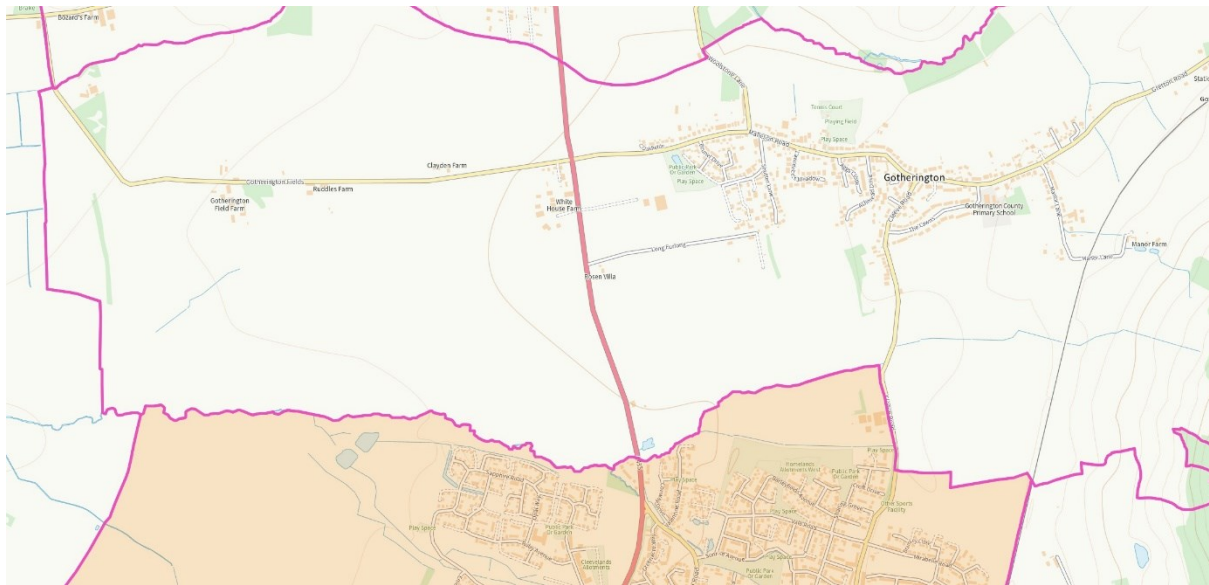


Figure 1 Existing boundary between Gotherington and Bishops Cleeve (Bishops Cleeve parish shown in pink)

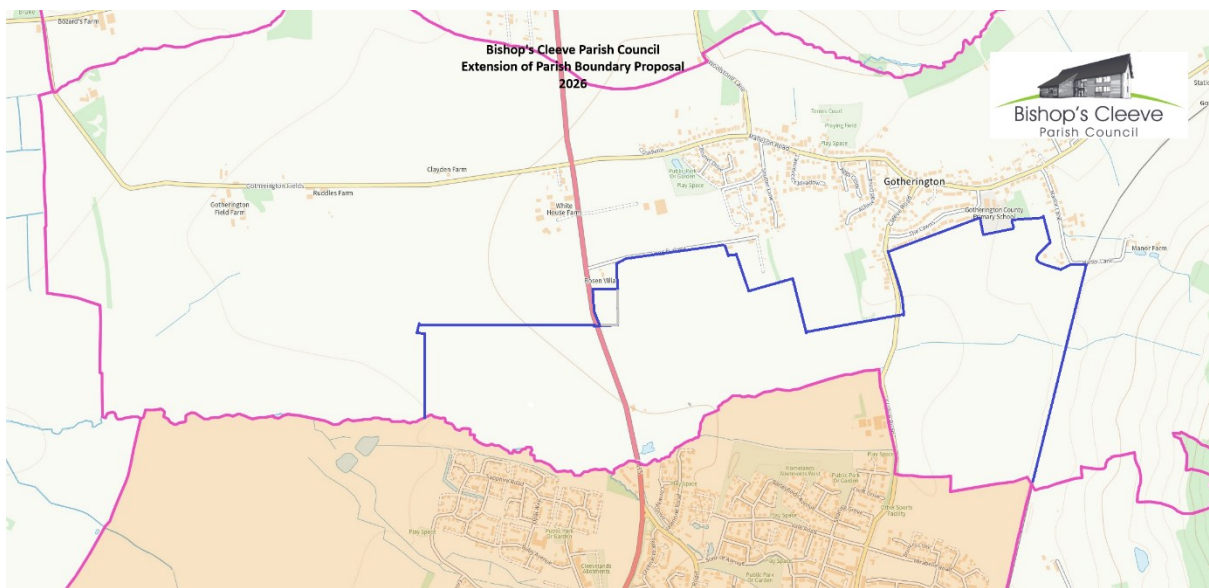
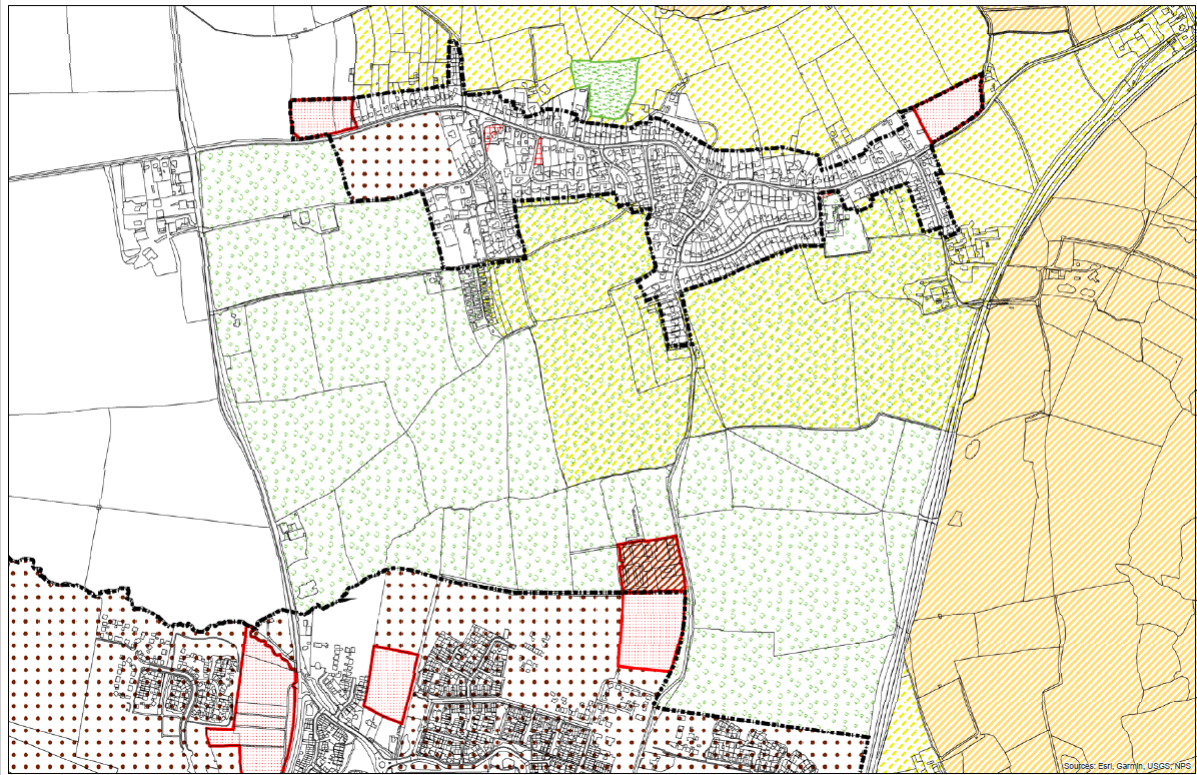


Figure 2 Proposed boundary between Gotherington and Bishops Cleeve (proposed boundary outlined in blue)

Appendix B: Extract from the Tewkesbury Borough Plan: Policy LAN3 Strategic Gap Map and legend (Policy LAN3 map and legend overleaf)

LAN3 - Bishop's Cleeve/Gotherington Strategic Gap



Map Legend

Pre-Submission Tewkesbury Borough Plan

	RES1 Housing Site Allocations
	RES2 Settlement Boundaries
	GTTS1 Site Allocations for Gypsies & Travellers
	EMP1 Existing Major Employment Site
	EMP1 New Major Employment Site
	EMP2 Existing Rural Business Centres
	EMP2 New Rural Business Centres
	GRB1 Green Belt
	JCS Strategic Allocations (Policy JCS SA1)
	JCS Safeguarded Land (JCS Policy SD5)
	GRB2 Gloucestershire Airport Non-Essential Operational Area
	Gloucestershire Airport Essential Operational Area (JCS Policy SD5)
	GRB3 - Bamfurlong Operational Policing Site
	RET2 Tewkesbury Town Primary Frontages
	RET2 Tewkesbury Town Centre Boundary
	RET3 Retail Centres
	RET9 Tewkesbury Town Regeneration Sites
	HER1 Conservation Areas
	HER3 Historic Parks & Gardens
	HER4 - Scheduled Ancient Monuments
	HER6 Tewkesbury (1471) Historic Battlefield
	Cotswolds AONB (JCS Policy SD7)
	LAN1 Special Landscape Areas
	LAN2 Landscape Protection Zone
	LAN3 Strategic Gaps
	LAN4 Locally Important Open Spaces
	LAN5 Local Green Space
	Article 4 Direction Boundary
	Existing development with planning permission
	TRAC7 Tewkesbury Northern Bypass Corridor
	TRAC8 Old Railway Line Tewkesbury

Appendix C: Extract of wording from the covenant relating to land at Homelands Farm

THE DEED OF COVENANT is made on the date set out in the Particulars

BY:

- (1) the Owners

FOR THE BENEFIT OF:

- (2) the Parish Council

BACKGROUND

- (A) The Owners owns land at Homelands Farm Bishop's Cleeve Gloucestershire and has made a planning application for the residential and ancillary development of part such land
- (B) Part of the Owners' land is located within the parish of Gotherington
- (C) The Owners agree with the Parish Council's expressed opinion that in the interests of local communities the proposed development of part of the Owners' land should not cause the parishes of Bishop's Cleeve and Gotherington to merge and accordingly the Owners are willing to enter into this Deed of Covenant restricting the development of part of the Owners' land on the terms set out below

--EXTRACT ENDS--