

## Tewkesbury Borough Plan – Pre-Submission

### Consultation Statement

March 2020

#### 1. Introduction

- 1.1. This consultation statement sets out how Tewkesbury Borough Council has undertaken public and stakeholder engagement on the Pre-Submission Tewkesbury Borough Plan in accordance with Regulation 19 and 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.2. Regulations 19 and 20 states that:

##### Publication of a local plan

*19. Before submitting a local plan to the Secretary of State under section 20 of the Act, the local planning authority must—*

- (a) make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with regulation 35, and*
- (b) ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 18(1).*

##### Representations relating to a local plan

*20. (1) Any person may make representations to a local planning authority about a local plan which the local planning authority propose to submit to the Secretary of State.*

*(2) Any such representations must be received by the local planning authority by the date specified in the statement of the representations procedure.*

*(3) Nothing in this regulation applies to representations taken to have been made as mentioned in section 24(7) of the Act.*

#### 2. Previous Consultations

- 2.1. Prior to the TBP Pre-Submission, the Borough Council, has undertaken three previous consultations on a draft plan under Regulation 18, these are:

- Scoping Issues and Options – consultation undertaken from 16<sup>th</sup> October to 26<sup>th</sup> November 2013.
- Draft Policies and Site Options – consultation undertaken from 27<sup>th</sup> February to 13<sup>th</sup> April 2015
- Preferred Options – consultation undertaken from 10<sup>th</sup> October to 30<sup>th</sup> November 2018

2.2. Separate consultation statements have already been produced for these consultation documents. These can be viewed here: <https://www.tewkesbury.gov.uk/local-plan>

### **3. Pre-Submission Consultation – What we did**

3.1. The consultation on the Pre-Submission Tewkesbury Borough Plan took place between Monday 4<sup>th</sup> October and Monday 18<sup>th</sup> November 2019.

3.2. In compliance with Regulation 19 and 20 and the Council’s Statement of Community Involvement publicity for the consultation was undertaken via the following methods:

- Setting up of a dedicated webpage on the Council’s website to host the consultation and access consultation documents (<https://www.tewkesbury.gov.uk/pre-submission-tewkesbury-borough-plan>)
- Providing copies of the consultation documents at the Borough Council’s offices as well as at all libraries and advice centres within the Borough.
- Sending out emails to all people and organisations signed up to the local plan consultation database and those asked to be kept update through the Preferred Options consultation.
- Issuing of press releases to local media to publicise the consultation
- Publishing a series of ‘tweets’ on Twitter and ‘posts’ of Facebook, through the Council’s own social media accounts, to publicise the consultation and consultation events.

3.3. The list of statutory and stakeholder consultation bodies specifically invited to make representations is set out at Appendix 1. A copy of the notification sent to all consultees is included at Appendix 2.

3.4. People were invited to respond to the consultation via email, by post or through a dedicated online consultation portal. The online portal involved the setting up of a dedicated response form that people were able to fill out electronically and submit their comments to the consultation, as well as sign themselves up the consultation database for any future notifications. This form was based on the ‘model representation form for local plans’ published by the Planning Inspectorate. This online form was replicated both as an electronic and hard copy format to enable people to complete it to email and post in response. This form can be viewed at Appendix 3.

#### 4. Pre-Submission Consultation – Summary of responses and key issues raised

- 4.1. The consultation generated over 900 individual comments submitted by approximately 545 separate respondents.
- 4.2. All the comments received on the Pre-Submission consultation have been entered into an electronic database (Appendix 4). [This database can be viewed here](#). The database has also been published on the council's website: <https://www.tewkesbury.gov.uk/pre-submission-tewkesbury-borough-plan>
- 4.3. In addition to the full database, a tabulated summary of the number of responses against each policy in the Pre-Submission Plan, including the number of responses who stated whether they considered the policy to be sound, legally compliant and meeting the duty to cooperate, has been prepared (also Appendix 4). This also includes a summary of omission sites submitted.
- 4.4. The Planning Inspectorate’s ‘Procedure Guide for Local Plan Examinations’ sets out that a summary of the main issues raised through the consultation should also be submitted along with copies of all representations. A summary of these main issues is set out in the tables below. This is not intended to be a detailed summary to cover every matter raised, but to signpost to the key issues raised as soundness objections and where parts of the plan received repeated comment.

**Table 1 – Housing Allocations**

<b>Tewkesbury Town</b>	
<b>Policy Area</b>	<b>Summary of Responses</b>
TEW1 Land at Odessa Farm	Two comments questioned the capacity of the site given the flood risk and landscape constraints, with stating the site is some distance from the facilities in Tewkesbury town. Another comment stated that capacity should be increased to maximise development potential. maximise development potential. Gloucestershire Wildlife Trust noted the importance of the adjacent river Swilgate corridor as part of the ecological network and supported the commitment to green infrastructure provision.
TEW2 Land adj to John Moore Primary School	One comment received stating that there is no site specific policy.  (This site now has planning permission for 30 dwellings - 19/00627/APP)
TEW3 Spring Gardens	One comment stated that the site is subject to significant flood risk and air quality issues and noted that finding investment to deliver the site could be an issue. Gloucestershire County Council supported the site specific policy for development to address air quality impacts.
TEW4 Healings Mill	Natural England, Tewkesbury Town Council and Gloucestershire Wildlife Trust object to the inclusion of part of the Severn Ham SSSI

	<p>within the allocation – but note the intention of the policy to not development on this part of the site and to enhance the SSSI. However it is suggested that it is excluded.</p> <p>A further comment noted the flood risk issues and the need for the exception test.</p>
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<b>Bishops Cleeve</b>	
BIS1 Land adj Breakers Yard	<p>Objection received from Bishops Cleeve Parish Council on the basis of the amount of housing already being delivered at the settlement. Objection from Gloucestershire County Council due to a lack of primary education provision at the settlement.</p> <p>(The site already has planning permission and is under construction - 14/01233/FUL)</p>
BIS2 Land at Homelands Farm	<p>Submission from site promoter stating that the site has a greater capacity – approximately 70 dwellings.</p> <p>Objection from Gloucestershire County Council due to a lack of primary education provision at the settlement.</p> <p>Objection received from Bishops Cleeve Parish Council as the land is prime agricultural land and there are concerns over access.</p>
BIS3 Land at allotments off A435	<p>80+ objections received to BIS3. Most relating to the provision of education at Bishops Cleeve (see below) with suggestions that this site would be suitable for a new primary school. Many from local people but also Bishops Cleeve Parish Council.</p> <p>Objection from Gloucestershire County Council due to a lack of primary education provision at the settlement, but also suggesting that BIS3 be allocated as a mixed use site for a primary school and housing.</p> <p>Comments from the site promote consider the capacity of the site could be approximately 95-105 dwellings.</p>
Primary School provision at Bishop's Cleeve	<p>Objections received to a proposed primary school being located at Kayte Lane, south of Bishops Cleeve on the playing fields of the existing Cleeve School. This is not being proposed in the Borough Plan but was being explored by Gloucestershire County Council and is an issue that has arisen following the publishing of the Pre-Submission Borough Plan.</p> <p>Objections are concerned with the provision of a new school to the south of the settlement when a substantial amount of new growth has occurred to the north.</p> <p>A number of comments object to BIS3 on the basis that this site would be more suitable for a new primary school, including the County Council.</p> <p>However, this site is being promoted for residential development by the land owner/promoter and is not currently available for education use.</p>

<b>Winchcombe</b>
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WIN1 Land off Delavale Road/Orchard Road	<p>170+ objections received to WIN1, largely from local residents but also Winchcombe Town Council and the Cotswolds Conservation (CCB) Board.</p> <p>The landscape impact of development was a significant concern amongst many who responded as the sites are within the Cotswolds AONB. There was also concern about impact on local highways and the services within the town.</p> <p>The CCB consider that the allocation does not adequately conserve and enhance the AONB and is therefore not legally compliant or sound. The main concern regards the south-west corner of the site as the most visible and protruding within the AONB setting. They recommend that the site boundary should amended to limit its extent. The CCB also consider that the allocation would constitute major development in the AONB and that the need for housing has not been adequately justified.</p>
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<b>Coombe Hill</b>	
COO1 Land at junction of A38/A4019	<p>One comment stated that the development proposed would be disproportionate relative to the size of the existing settlement. An objection from the site promoter stated that the site has the capacity for 150 dwellings</p> <p>(This site now has planning permission for 40 dwellings - 17/01337/OUT, and a further application for 150 dwellings has been received - 20/00140/OUT)</p>
COO2 Land adj to the Swan PH	<p>Gloucestershire Wildlife Trust regards that a joint provision of Suitable Alternative Recreation Space should be considered in this location to avoid degradation of the SSSI and SPA from recreational pressure.</p>

<b>Gotherington</b>	
GOT1 Land to the north of Malleston Road	No comments received
GOT2 Land to the north of Gretton Road	No comments received

<b>Maisemore</b>	
MAI1 Land at Bell House Farm	No comments received

<b>Shurdington</b>	
SHU1	A number of objections were received to SHU1, mixed between members of the public and developers/promoters. Concerns were primarily around the justification for the allocation of a Green Belt

Land at corner of Badgeworth Ln and A46	site, including because of the availability of other non-Green Belt sites within the Borough. Some concerns were raised about the traffic impact of the site on Badgeworth Lane and A46, particularly with the nearby location of the school.
SHU2 Land north of Leckhampton Lane	Two objections were received to SHU1 from developers/promoters. Concerns were focused around the justification for the allocation of a Green Belt site, including because of the availability of other non-Green Belt sites within the Borough.
SHU3 Garage Site at Harrison Road	Gloucestershire County Council noted the sites accessibility by public transport.

<b>Toddington</b>	
TOD1 Land adj to Pheasant Public House	The promoter of the site considered that a higher density and capacity is achievable on this site. National Grid note the presences of a gas transmission pipeline in the proximity of the site.

<b>Woodmancote</b>	
WOO1 Land adj Oxbutts Caravan Park	Three comments supporting the allocation were received. An objection was received from Bishops Cleeve Parish Council due to additional pressure on local services, including schools.
Two Hedges Road	This is not a proposed allocation in the plan, however it is noted that 50+ responses were received supporting the plan's position not to allocate a site in this area. A site is still being promoted as an omission site.

<b>Forthampton</b>	
FOR1 Land at corner of Bishops Walk and School Lane	Forthampton Parish Council object to the inclusion of this site. The Parish Council were previously supportive of a site but are now concerned regarding the lack of services at the village.

<b>Brockworth</b>	
BRO1 Land adj to Hucclecote Road and Golf Club Lane	One response considered that this site should be counted towards Gloucester's housing requirements rather than Tewkesbury's.  Gloucester Wildlife Trust state that a Habitats Regulations Assessment is needed for the additional recreation impact on the Cotswold Commons and Beechwoods Special Area of Conservation
BRO2 Nerva Meadows, Gloucester Business Park	One response considered that this site should be counted towards Gloucester's housing requirements rather than Tewkesbury's.

	Gloucester Wildlife Trust state that a Habitats Regulations Assessment is needed for the additional recreation impact on the Cotswold Commons and Beechwoods Special Area of Conservation
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**Table 2 – Housing Policies**

<b>Policy Area</b>	<b>Summary of Responses</b>
RES1 – Housing Allocations	<p>66 omission sites are promoted.</p> <p>Soundness objections are also made against the policy in more general terms, on the premise that the plan’s allocations will be insufficient for the Council to demonstrate a five-year supply of housing land, the plan is not fully addressing the plan period OAHN shortfall identified in the adopted JCS, and the plan is not applying the standard method for assessing local housing need and its resulting additional need.</p> <p>Objections are also made on the basis that the plan seeks to allocate housing land at the Rural Service Centres and Service Villages that is in excess of the minimum requirements set by JCS Policy SP2</p>
RES2 – Settlement Boundaries	<p>Objections are made to the extent of the proposed settlement boundary at Minsterworth as it excludes a number of other areas of land in and around the village which are considered to form part of the village. Conversely, Forest of Dean District Council (FODDC) raise concerns over the impact that further development in Minsterworth will have, as the village has rural “hit and miss” frontages along the A48 and further development is currently consolidating the existing ribbon development which significantly harms the rural character of this area. Representations are made from a number of individuals/organisations requesting the inclusion of their land within respective settlement boundaries. Objections are also made that the settlement boundaries are in general too tightly drawn and should be widened to include additional land for windfall development. FODDC consider that a larger number of defined boundaries (over and above the Rural Service Centres and Service Villages) would better protect the countryside, landscape and designated areas while providing scope for new development.</p>
RES3 – New Housing Outside Settlement Boundaries	<p>Objections are based on concern that the policy is too restrictive and doesn’t allow for windfall sites to come forward on the edge of settlements but outside of the settlement boundary.</p>
RES4 – New Housing at other rural settlements	<p>Objections are made against the policy requirement for developments to cumulatively not exceed 5% growth or 10 dwellings (whichever is the lesser) on the premise that it’s too restrictive and is an arbitrary limit to development that may not reflect the circumstances at in individual settlement. Some support</p>

Policy Area	Summary of Responses
	<p>is however also given to this part of the policy for providing certainty on scale.</p> <p>The Policy in general also received some support due to its role in sustaining rural communities</p> <p>Concern is raised by FODDC that the policy supports unsustainable development which has no justification other than being housing, and that it would undermine the delivery of affordable housing and rural exception sites. Suggested by FODDC that the use of settlement boundaries may provide a more appropriate approach for some settlements.</p>
RES5 – New Housing Development	<p>Objections are made to policy requirements for edge of settlement sites to retain a sense of transition between the settlement and open countryside, and for proposals to incorporate into the development any natural or built features on the site that are worthy of retention on the basis that it would introduce too much subjectivity. Objection is also made on basis that policy doesn't require proposals to make appropriate arrangements for waste collection.</p>
RES6 – Rural Exception Sites	<p>Objections to part of policy allowing for some market housing to be delivered on rural exception sites if required to support viability (cross subsidy), on the premise that it would be open to abuse. Also objection to policy requirement for applications to be supported by an up to date housing needs survey as it presents a barrier to sites coming forward.</p> <p>FODDC request clarity in respect of the letting of affordable housing units as the plan suggests that in all cases affordable housing units will be restricted in perpetuity to occupation by households with a member in housing need, which is not practical this would require a Registered Provider to undertake regular financial assessments of the household's income to determine if they are still in housing need.</p>
RES7 – Reuse of rural buildings for residential use	<p>One comment raises concern raised that policy doesn't highlight that the presence of protected species is a material consideration. One comment raises concern raised that policy excludes the opportunity to make improvements to buildings</p>
RES8 – Sub division of existing dwellings	<p>An objection is raised on basis that making good use of built form is sustainable in principle irrespective of a sites location and should not be treated as if it were new general residential development. Also concern from one commenter that policy doesn't require provision of waste storage facilities</p>



Policy Area	Summary of Responses
RES9 – Replacement Dwellings	No representations made
RES10 – Alteration and extension of existing dwellings	One comment raises concern raised that policy doesn't highlight that the presence of protected species is a material consideration. Also concern from one commenter that policy doesn't require provision of waste storage facilities
RES11 – Change of use of agricultural land to domestic garden	One comment raises concern that policy is unlikely to be compliant with the incoming Environment Act. Requested that policy requires land-use changes to not have a significant impact on local ecological networks or deliver a net loss of priority habitat.
RES12 – Affordable Housing	<p>Objections raised that policy isn't consistent with paragraph 62 of the NPPF insofar as its approach to off-site affordable housing provision is concerned. Also that the second part of the policy (viability) should be deleted as it repeats policy in the JCS (Policy SD12).</p> <p>Objections are raised that the policy relates to a strategic policy that shouldn't be included in a second tier plan, the 40% affordable housing requirement (which is taken from the adopted JCS) is based on outdated evidence, and the viability evidence supporting the policy does not justify the proposed levels of affordable housing. Also objection that the policy doesn't make specific provision for entry level exception sites and affordable home ownership. FODDC suggest that there is a need to consider also varying the tenure mix to aid viability</p>
RES13 – Housing Mix	<p>Objection raised that policy continues to make reference to a requirement for accessible and adaptable (Regulation M4(2) Category 2) and for Wheelchair user (Regulation M4(3) Category 3) dwellings as part of housing mix. Considered that there is a lack of evidence. Some concern however, including from FODDC, that policy isn't clear and specific enough over required housing/tenure mix, proportions of category M4 dwellings and requirements for self build plots. Objection also based on policy relating to a strategic policy that shouldn't be included in a second tier plan, and it not being based on a robust assessment of viability.</p>
RES14 – Specialist accommodation for older people	<p>Objection to part of policy requiring developments that fall within Use Class C3 and self-contained units within Use Class C2, to provide affordable housing on premise that it could render some development to be unviable. Objection also raised to policy approach to developments on sites outside of settlement boundaries on the basis that it isn't consistent with national policy and is too onerous.</p>
GTTS1: Site allocations for	Objection that policy does not contain any specific site allocation provision for transit gypsy sites in the Borough for which there is a

Policy Area	Summary of Responses
Gypsies and Traveller	need, and this conflicts with the guidance set out in the NPPF and Planning Policy for Traveller Sites (2015).

**Table 3 – Economy and Tourism Policies**

Policy Area	Summary of Responses
Employment: General	A response from the Gloucestershire GFirst LEP recognises that the Borough Plan has been robustly prepared to regard to employment allocations and meeting its JCS requirements, but that there is an overall shortfall in the JCS area that needs to be addressed by the three authorities.
EMP1 Major Employment Sites	<p>A range of omissions sites were submitted for consideration as Major Employment Sites. This includes a range of existing employment sites that are currently undesignated.</p> <p>Specific objections were received to the proposed extension of Malvern View Business Park (Bishops Cleeve) as it is being promoted as a housing site. However this site has now subsequently been granted permission for residential development with some employment uses (18/00249/OUT).</p> <p>A responses was received from Gloucestershire Airport seeking further expansion of the proposed employment allocations to Meteor and Bamfurlong (Anson) business parks.</p> <p>A response from the Gloucestershire GFirst LEP stated that there should be provision for ancillary uses on major employment sites that support business parks and employees.</p>
EMP2 – Rural Business Centres	<p>Bishops Cleeve Parish Council object to the allocation of Homelands Farms under EMP2, mainly due to the impact on sensitive landscape gap between Bishops Cleeve and Gotherington.</p> <p>There were two objections, including from Leigh Parish Council, on the proposed expansion of Knightsbridge Business Centre.</p> <p>A response from the promote of Brockeridge Farm Business Centre was received seeking the further expansion of the proposed employment allocation.</p> <p>A range of omissions sites were submitted to the consultation for consideration as Rural Business Centres. This includes a number of existing employment sites that are currently undesignated.</p>
EMP3 – Employment Sites within	A response was received that considered that the policy should include provision for the development of employment proposals adjacent to settlement boundaries.

Policy Area	Summary of Responses
Settlement Boundaries	
EMP4 – Rural Employment Development	No comments received.
EMP5 – New Employment Development (General)	<p>An objection from Gloucestershire County Council stated that the policy does not take into account the need for effective waste management.</p> <p>Gloucestershire Wildlife Trust consider that the policy point around environment impact should move away from their not being unacceptable loss to their being net positive gain.</p>
EMP6 – Safeguarding of Employment Sites	<p>A number of objections stated that there needs to be recognition in the policy that there may be circumstances where it can be demonstrated that a site is unlikely to come forward for employment uses, and that an alternative use may have wider economic benefits.</p> <p>An objection from Gloucestershire County Council stated that the policy does adequately deal with the safeguarding of waste management facilities.</p>
AGR1 – Agricultural Development	Gloucestershire Wildlife Trust consider that the policy needs to consider the impact that agricultural development would have on biodiversity and local ecological networks.
AGR2 – Agricultural Diversification	No objections to the policy.
AGR3 – Agricultural and other rural workers dwellings	No comments received.
AGR4 – Removal of occupancy conditions	One objection received that felt the policy is too restrictive, particularly regarding the requirement to market the property for a set period.
TOR1 – Tourism Related Development	Gloucestershire Wildlife Trust consider that the policy needs better alignment with environmental commitments and biodiversity net gain.
TOR2 – Serviced/self-catering accommodation	One comment didn't think that policy did enough around the provision of waste storage.
TOR3 – Caravan and camping sites	No comments received.

<b>Policy Area</b>	<b>Summary of Responses</b>
TOR4 – Herefordshire and Gloucestershire Canal Restoration	Support from the Canal & River Trust
TOR5 – Gloucestershire Warwickshire Railway	Support from Gloucestershire County Council.

**Table 4 – Green Belt Policies**

<b>Policy Area</b>	<b>Summary of Responses</b>
GRB1 – Green Belt Review	<p>A significant number of comments were received supporting that the plan does not propose to remove a site at Two Hedges Road, Woodmancote from the Green Belt.</p> <p>A number of omission sites within the Green Belt were put forward for consideration.</p> <p>A number of objections were made in relation to the proposed release of land at Shurdington for housing allocations and employment allocations at Staverton. Responses felt that were not exceptional circumstance present and that other non-Green Belt options were available within the Borough.</p>
GRB2 – Gloucestershire Airport	A responses was received from Gloucestershire Airport seeking further expansion of the proposed employment allocations to Meteor and Bamfurlong (Anson) business parks.
GRB3 – Bamfurlong Operational Policing Site	No comments received.

**Table 5 – Town Centres and Retail Policies**

<b>Policy Area</b>	<b>Summary of Responses</b>
RET1 – Maintaining the viability and viability of the town, borough and local centres	A comment considered that retail areas coming forward through the JCS strategic allocation sites should be explicitly referenced as local centres. This includes retail permissions granted at allocations at Innsworth and Ashchurch.

<b>Policy Area</b>	<b>Summary of Responses</b>
RET2 – Tewkesbury Town Centre and Primary Frontages	No comments received.
RET3 – Retail Centres	No comments received.
RET4 – Out of Centre Development	A comment stated that there should be greater clarity over what is considered a designated centre through this policy – specifically local centres.
RET5 – Single or Small groups of shops in residential areas	An objection was received regarding the requirement for sequentially preferable sites to be identified for proposals over 280sqm gross floor spaces in residential areas. A comment stated that clarification over what is considered ‘small’ is also required.
RET6 – Hot Food Takeaways	Gloucestershire County Council (Public Health) supported the policy but suggested that consideration be given to location of takeaways in proximity to schools.
RET7 – Local Shops and Public Houses	No comments received.
RET8 – Agricultural/Horticultural Retail in the countryside	An objection was received stating the policy is unclear and ambiguous and provides a more onerous approach to garden centres and farms shops than for other out of centre retail developments.
RET9 – Tewkesbury Town Regeneration	No comments received.

**Table 6 – Quality Places Policies**

<b>Policy Area</b>	<b>Summary of Responses</b>
DES1 – Housing Space Standards	A number of objections were received to this policy from developers/housebuilders on the basis that there is insufficient evidence to support the need to adopt these standards in the Borough. In addition, a number of comments questioned impact on development viability in requiring these standards, especially in combination with the developer obligations already in place through the JCS and CIL. Comments on the Council’s supporting viability evidence were also made.  Support for this policy was provided by Gloucestershire County Council (Public Health).

<b>Policy Area</b>	<b>Summary of Responses</b>
DES2 – Street Signage & Furniture	No comments received.
DES3 – Advertisements, Signs & Notice Boards	No comments received.
DES4 - Shopfronts	No comments received.
HER1 – Conservation Areas	One comment received stated that the policy fails to ensure the provision of waste storage facilities.
HER2 – Listed Buildings	No objections to the policy.
HER3 – Historic Parks and Gardens	No objections to the policy.
HER4 – Archaeological Sites and Scheduled Monuments	Gloucestershire County Council suggested a revision to policy for clarification around excavation and recording.
HER5 – Locally Important Heritage Assets	One comment stated that the supporting text should direct people towards the Gloucestershire Historic Environment Record.
HER6 – Tewkesbury (1471) Historic Battlefield	One response was promoting a development site within the registered battlefield area.

**Table 8 – Natural Environment Policies**

<b>Policy Area</b>	<b>Summary of Responses</b>
LAN1 – Special Landscape Areas	<p>A number of objections were received for this policy stating that it constitutes a protectionist and negative approach, contrary to the NPPF, and that there is not adequate justification for rolling forward the designation from the current Tewkesbury Borough Local Plan. Other objections raise concern that the Special Landscape Area (SLA) designation is inconsistent with the landscape and visual sensitivity of specific land being promoted for development, and also concern that any development would fail the policy requirement to maintain the quality of the natural environment, including its visual attractiveness.</p> <p>Some support for policy due to its role in protecting both the setting of the AONB and other areas of high landscape value. Also requests for additional land to the north of Ashchurch/Northway to be included within the SLA designation.</p>

Policy Area	Summary of Responses
LAN2 – Landscape Protection Zone	<p>A number of objections argue that the policy is not justified nor consistent with national policy as it based on potentially out-dated evidence that may not be accurate or relevant.</p> <p>Also an objection requesting that a specific area of land (being promoted for development) is removed from the Landscape Protection Zone (LPZ) as it is not visible from the river. Also a request for additional land to the north of Ashchurch/Northway to be included within the LPZ designation.</p>
LAN3 – Strategic Gaps	<p>Support for this policy was received by many respondents, with some requesting that it is extended further.</p> <p>A number of objectors request the removal of land (being promoted for development) from the strategic gap between Bishops Cleeve and Gotherington</p>
LAN4 – Locally Important Open Spaces	<p>A number of additional important open spaces were suggested (see comments to Appendix 2 which lists the Locally Important Open Spaces)</p>
LAN5 – Local Green Space	<p>General support for the policy. One comment requests that policy refers to additional mechanisms where additional Local Green Space can be designated (i.e. not just via a Neighbourhood Development Plan.</p>
NAT1 – Biodiversity, Geodiversity and Important Natural Features	<p>Support for this policy was received by many respondents, particularly its requirement for biodiversity net gain, but with some requesting that the policy is strengthened further and changes made to bring it up to date with the current terminology.</p> <p>Objections are based on the policy requirement for all developments to deliver a biodiversity net gain not being consistent with the NPPF and premature to emerging legislation. Clarity is also requested over the terminology used within the policy and how the policy requirement for net gain will be applied in practice. Also concern that the criteria in forth part of policy are too onerous and may represent a disproportionate approach in some cases.</p>
NAT2 – The Water Environment	<p>One respondent gave support for this policy. One objection to policy based on suggestion that its provisions should only apply where proposals involve an Environment Impact Assessment</p>
NAT3 – Building with Nature	<p>Support for this policy was received by many respondents. Some objection suggesting that Building with Nature should only be a voluntary standard and it should not place additional/onerous demands on developers</p>
NAT4 – Tewkesbury Nature Reserve	<p>General support for this policy provided.</p>

<b>Policy Area</b>	<b>Summary of Responses</b>
NAT5 - Cotswold Beechwoods	Support for policy.
ENV1 – Development near sewage treatment works	One objection suggests that the policy should extend to odour from waste sites. One objection requests that the policy includes provision that new development does not unreasonably impact up on the operation of existing sewage treatment sites.
ENV2 – Flood Risk and Water Management	General support for policy, but with some objection that it is weighted towards surface water control rather than ensuring all forms of flooding are considered within the borough. Also suggested that policy should require financial contributions towards flood warning systems where relied on. Other objections are to the requirement for sustainable drainage systems to deliver multifunctional benefits stating that it is too prescriptive and not consistent with NPPF, and that the policy contains no measurable or definable levels of flood avoidance or reduction.
Policy ENV3 – Solar Farms	One objection that policy does not explicitly protect against impacts on local ecological networks and therefore does not align with the NPPF, the aspirations of the 25 Year Environment Plan and likely contents of the Environment Act.

**Table 8 – Communities, Health and Recreation Policies**

<b>Policy Area</b>	<b>Summary of Responses</b>
HEA1 – Healthy & Active Communities	Support for this policy was provided by Sport England and Gloucestershire County Council (Public Health). However, GCC Public Health felt all major developments should be required to demonstrate potentials on health and wellbeing.  Two objections considered that there was no evidential basis for requiring a HIA screening for the development size thresholds provided. Another objection considered that HIA screening could be instead be undertaken as part of an EIA screening.
RCN1 – Public Outdoor Space, Sports Pitch and Sports Facility Provision	The policy was supported by Sport England. A number of comments received stated that there needs to be greater clarification regarding off site provision. One comment stated that open space in private ownership, that is not publicly accessible, should excluded from requirements for protection.
RCN2 – New Sports and Recreational Facilities	The policy was supported by Sport England. The Gloucestershire Wildlife Trust stated that impacts of local ecological networks should be referenced in the policy.
RCN3 – Allotments &	Two objections received stated that this policy was too onerous, inflexible and did not take into account of viability considerations.



<b>Policy Area</b>	<b>Summary of Responses</b>
Community Gardens	
RCN4 – Horse Riding Facilities	The policy was supported by Sport England. The Gloucestershire Wildlife Trust stated that impacts of local ecological networks should be referenced in the policy. One comment objected that the policy is too narrow, too negative and too restrictive.
COM1 – Protecting Community Assets	The policy was supported by Sport England and the Theatres Trust.
COM2 – Broadband Provision	No comments received.
COM3 - Telecommunications	No comments received.
COM4 – Neighbourhood Development Plans	No comments received.

**Table 9 – Transport & Accessibility**

<b>Policy Area</b>	<b>Summary of Responses</b>
General	Highways England queried whether transport policies in the JCS needed to be set out or referenced in the Borough Plan and ensure that development brought forward through the Borough Plan contributes towards the overall JCS transport strategy. Highways England also wanted to understand whether development identified in the Borough Plan would lead to a different mitigation and infrastructure requirements than set out in the JCS transport strategy.
TRAC1 – Pedestrian Accessibility	No objections to the policy.
TRAC2 – Cycle Network & Infrastructure	One objection received stated that there is no justification provided to support the policy requirement to prioritise cycling over other forms of transport and that it is inconsistent with national policy. Supportive comments were received by Gloucestershire and Worcestershire County Councils.
TRAC3 – Bus Infrastructure	No objections to the policy.
TRAC4 – High Frequency Bus Routes	No comments received.

Policy Area	Summary of Responses
TRAC5 – Ashchurch for Tewkesbury Rail Station	Support provided by Gloucestershire County Council.
TRAC6 – M5 Junction 9/A46 Corridor	<p>Comments from three local organisations made specific comments on potential off-line improvement to the A46, including querying possible routes.</p> <p>One objection received commented that this policy prejudices the outcome of the JCS Review and is not necessary.</p> <p>Highways England provided general support for the policy.</p>
TRAC7 – Tewkesbury Northern Bypass Corridor	No objections to the policy.
TRAC8 – Old Railway Line Tewkesbury	No comments received.
TRAC9 – Parking Provision	Three objections were received to this policy that focussed on the charging of plug-in or ultra-low emission vehicles. Comments stated that the policy has not been justified by evidence and is not consistent with national policy.

## APPENDIX 1 – List of statutory and stakeholder consultation bodies

<b>Statutory Consultees and Government Departments</b>
The Coal Authority
The Environment Agency
Historic England
The Marine Management Organisation
Natural England
Network Rail Infrastructure Limited
Highways England
Gloucestershire County Council
Worcestershire County Council
Malvern Hills District Council
Wychavon District Council
Forest of Dean District Council
Stroud District Council
Gloucester City Council
Cheltenham Borough Council
Cotswold District Council
Electronic Communications Operators (British Telecommunications Group; Virgin Media)
West Gloucestershire Primary Care Trust
NHS Gloucestershire Clinical Commissioning Group
National Grid
Western Power Distribution
Wales & The West Utilities Ltd
Severn Trent
Thames Water
Ministry of Housing, Communities and Local Government
Department for Digital, Culture Media and Sport
Department for Environment, Food and Rural Affairs
Department for Transport
Ministry of Defence
Homes England

<b>National organisations</b>
Age UK
The Conservation Volunteers
CAMRA
Campaign to Protect Rural England
Canal and River Trust (formerly British Waterways)
Church Commissioners

Civil Aviation Authority
Friends of the Earth
Great Western Railways
Health and Safety Executive
House of Commons
National Farmers Union
Sport England
National Playing Fields Association (Fields in Trust)
National Trust
Sustrans
The Ramblers
The Showman's Guild of Great Britain
UK Rainwater Harvesting Association
Gypsy Law Reform Coalition
Travellers Movement
Advisory Council for the Education of Romany and other Travellers
RSPB
Association of Independent Showmen
The Woodland Trust
South West Councils

<b>County organisations</b>
Cotswolds Conservation Board
Carers Gloucestershire
Active Gloucestershire
Active Gloucestershire (alt)
Alzheimer's Society
County Community Projects
GAVCA
Glos CC (Economic Growth)
Glos CC (Education)
Glos County Cricket Club
Gloucestershire FA
Gloucestershire Rugby Football Union
Gloucestershire Domestic Violence Support and Advocacy Project (GDVSAP)
Gloucestershire Hospitals NHS Foundation Trust
Gloucestershire Care Providers Association (GCPA)
Gloucestershire Environmental Trust Company
Gloucestershire County Scout Office
Gloucestershire Police and Crime Commissioner
Gloucestershire Care Services NHS Trust

Gloucestershire Association of Parish and Town Councils
Gloucestershire Constabulary
Gloucestershire Fire Service
Gloucestershire Playing Fields Association
Gloucestershire Rural Community Council
Gloucestershire VCS alliance
Gloucestershire Wildlife Trust
Gloucestershire Wildlife Trust (alt)
Gloucestershire First (LEP)
Gloucestershire Local Nature Partnership
Gloucester Youth & Community Service
Tewkesbury Chamber of Commerce and Industry
Gloucester Chamber of Commerce
Gloucestershire Association for Disability (GAD)
Gloucestershire Disability Forum
Adult Opportunity Centre
Diocese of Gloucester
Guinness Partnership
Severn Vale
Bromford
Fortis
Hanover
Sovereign
Rooftop
Cottsway
Stonewater
Two Rivers
Merlin
Gloucester City Homes
Sanctuary
Liverty
Housing & Care 21
South West Housing Body
Severn and Wye Energy Agency
Marchants
Stagecoach
Ecotricity
EDF Energy
SSE Energy
Developers Planning Consultants and Agents

## **APPENDIX 2 – Notification sent to all consultees**

Dear Sir/Madam

### Tewkesbury Borough Plan Pre-Submission Consultation

I write to inform you that the Pre-Submission Tewkesbury Borough Plan was approved for public consultation, and subsequent submission to the Government for public examination, at a meeting of the Council on 30th July 2019.

This consultation will take place for the minimum statutory 6 week period between the 4th October 2019 and 18th November 2019.

All comments must be received by 5pm on 18th November 2019. Any comments received after this deadline will not be accepted and will not be considered to be 'duly made' representations.

All representations received to this consultation will be submitted to the Government alongside the Pre-Submission plan for consideration as part of the examination process. The submission of the plan will take place shortly after the close of the consultation.

Please note that copies of all comments will be made available for the public to view (including your name, but will not include any personal contact details or signatures), and therefore cannot be treated as confidential. Data will be processed and held in accordance with the General Data Protection Regulations 2018 and Data Protection Act 2018.

If you wish to view the plan, find out more about the consultation and make comments on what the Tewkesbury Borough Plan then please visit the website: [www.tewkesbury.gov.uk/boroughplan](http://www.tewkesbury.gov.uk/boroughplan)

In order to make it easier to submit responses an online consultation form has been set up and we are encouraging people to use it to make their comments. This form can also be downloaded so responses can be emailed and posted to the Council.

Representations on any of the documentation should be made in writing, either via:

- the online consultation available via: [www.tewkesbury.gov.uk/boroughplan](http://www.tewkesbury.gov.uk/boroughplan)
- by email [localplanconsultation@tewkesbury.gov.uk](mailto:localplanconsultation@tewkesbury.gov.uk)
- by post to: Planning Policy Team, Deputy Chief Executive's Unit, Tewkesbury Borough Council, Gloucester Road, Tewkesbury, GL20 5TT

Supporting documentation can be viewed on the council's website at [www.tewkesbury.gov.uk/boroughplan](http://www.tewkesbury.gov.uk/boroughplan) or at Tewkesbury Borough Council's main offices (at the above address) and at all libraries and Advice Centres in the borough - opening times and other details are available at [www.tewkesbury.gov.uk](http://www.tewkesbury.gov.uk).

If you have any other questions on this consultation the Planning Policy Team can also be contacted on [planningpolicyenquiries@tewkesbury.gov.uk](mailto:planningpolicyenquiries@tewkesbury.gov.uk)

Yours sincerely

Planning Policy Manager

**APPENDIX 3 – Consultation response form**

**Pre-Submission Tewkesbury Borough Plan  
Response Form**

**PART A: Personal Details – only complete once**

Title:

Name:

Company:

Email Address:

Address:

**If you are acting on behalf of a client, please supply the following details:**

Client Name:

Client Organisation:

**Keeping you updated**

Would you like to be notified of future progress on the Tewkesbury Borough Plan? (\* we will do this via email)

YES

NO

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

Name or Organisation:

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

Paragraph

Policy

Policies Map

Do you consider the Local Plan is :

1) Legally compliant

Yes

No

2) Sound

Yes

No

3) Complies with the Duty to co-operate

Yes

No

Please tick as appropriate

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.



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

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

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

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

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

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

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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

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

Signature:

Date: