

**Tewkesbury Borough Plan Addendum:
Schedule of Changes to the Pre-Submission Plan**

To accompany the submission of the Tewkesbury Borough Plan the Borough Council has prepared a schedule of changes that could be made to Pre-Submission (October 2019) version of the plan.

The Planning Practice Guidance (PPG) (Paragraph: 054 Reference ID: 61-054-20190315) states that the local planning authority can include changes in an addendum to the plan before it is submitted for examination.

As per the PPG, it is not intended for these changes to be treated as part of the submitted plan, but are to be considered by the Inspector during the examination process. As such they have not been subject to further consultation.

The changes presented in the schedule below have been generated following review of the representations received to the Pre-Submission consultation. They consist of amendments that the Borough Council would like the Inspector to consider through the examination process and may result in proposed modifications to the plan if the Inspector was minded to do so.

It is not considered that any of the potential changes go to the heart of soundness of the plan, but instead represent an opportunity at this stage of the plan making process to proactively present further positive improvements and clarifications to the plan.

At Appendix 1 to this schedule, the Borough Council has produced a tracked change version Pre-Submission which shows these potential changes within the whole plan context.

NOTE

- Proposed text to be deleted show in ~~strikethrough~~
- Proposed text to be inserted shown in *red italics*

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
PM01	Para 2.2 (Introduction)	It is forecast that over the next 14 years Tewkesbury borough will experience significant growth	It is forecast that over the next 14 years Tewkesbury borough will experience significant growth	Amendment to reflect the JCS plan period remaining.
PM02	Para 2.35	'Healthy and happy communities' includes social interests such as health (physical and mental), homes, recreation, cultural and religious needs.	'Healthy and happy communities' includes social interests such as <i>education, training</i> , health (physical and mental), homes, recreation, cultural and religious needs.	Suggestion received to include reference to education and training within the vision.
PM03	Para 2.38 (Objectives and Key Principles)	2. Promoting healthy connected communities (including recreation, culture and religious needs [and closely linked to active modes of transport]). This also includes the provision of infrastructure;	2. Promoting healthy connected communities (including recreation, culture, and religious and <i>social</i> needs [and closely linked to active modes of transport]). This also includes the provision of infrastructure;	Request from Gloucestershire County Council – Public Health to recognise social needs as part of promoting healthy communities.
PM04	Policy TEW1 - Land at Odessa Farm, Tewkesbury	Public open space should be provided to the south of the site; in order to provide a transition between built development and open countryside; and to the east of the site in order to avoid development in Flood Zones 2 and 3 and the part of the site in the Registered Battlefield and Conservation Area. All built development must be located in Flood Zone 1.	Public open space should be provided to the south of the site; in order to provide a transition between built development and open countryside; and to the east of the site in order to avoid development in Flood Zones 2 and 3 and the part of the site in the Registered Battlefield and Conservation Area. All built development must be located in Flood Zone 1 <i>taking into account appropriate, locally specific allowances for climate change.</i>	Response from the Environment Agency (EA) requests alterations to the policy to address flood risk
PM05	Policy TEW3- Spring Gardens, Tewkesbury	Deliver a biodiversity net gain, including by improving habitat connectivity and acting as a stepping stone between the nearby Key Wildlife Site (Tewkesbury Disused Railway Line) and the Severn Ham Site of Special Scientific Interest	Deliver a biodiversity net gain, including by improving habitat connectivity and acting as a stepping stone between the nearby <i>Local</i> Key Wildlife Site (Tewkesbury Disused Railway Line) and the Severn Ham Site of Special Scientific Interest	Reference to 'Key Wildlife Site' should be changed to 'Local Wildlife Site' following a change in terminology by the Local Nature Partnership in 2019.
PM06	Policy TEW4 - Healings Mill, Tewkesbury	pass the flood risk 'exception test' (as set out in the National Planning Policy Framework) in relation to the parts of the development involving more vulnerable uses (including residential)	pass the flood risk 'exception test' (as set out in the National Planning Policy Framework) in relation to the parts of the development involving more vulnerable uses (including residential), <i>and be designed to be flood</i>	Response from the Environment Agency (EA) requests alterations to the policy to address flood risk

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		Deliver a biodiversity net gain, which may include the expansion/restoration of the habitats associated with the Severn Ham SSSI	<p><i>resistant/resilient (as appropriate) for the lifetime of the development including providing a safe access/egress and taking into account appropriate, locally specific allowances for climate change</i></p> <p><i>address the site specific FRA requirements set out within the Level 2 Strategic Flood Risk Assessment (November 2017)</i></p> <p>Deliver a biodiversity net gain, including which may include the expansion/restoration of the habitats associated with the Severn Ham SSSI</p>	Comments from Natural England state that to be consistent with Policy NAT1 there should be an amendment to the policy to be more definitive.
PM07	Policy BIS2 - Land at Homelands Farm, Bishops Cleeve		<i>Proposals should address the site specific FRA requirements set out within the Level 2 Strategic Flood Risk Assessment (November 2017)</i>	Added to for consistency and in response to comments received from the EA
PM08	Policy BIS3 – Land at allotments off A435, Bishops Cleeve	<p>All built development must be located in Flood Zone 1</p> <p>A landscaped green edge should be provided to the north of the site corresponding to, and providing visual and functional connectivity with, the green infrastructure in the adjacent development to the west (Clevelandlands) and providing biodiversity net gains</p>	<p>All built development must be located in Flood Zone 1 <i>taking into account appropriate, locally specific allowances for climate change. Proposals should address the site specific FRA requirements set out within the Level 2 Strategic Flood Risk Assessment (November 2017) and its associated Addendum (July 2019)</i></p> <p>A landscaped green edge should be provided to the north of the site corresponding to, and providing visual and functional connectivity with, the green infrastructure in the adjacent development to the west (Clevelandlands) and providing biodiversity net gains <i>focusing on ecological enhancements to the Dean Brook</i></p>	Response from the Environment Agency (EA) requests improvements to policy in relation to flood risk/ecology

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PM09	Policy WIN1 - Land off Delavale Road/Orchard Road, Winchcombe	Proposals on these sites should address the site specific FRA requirements set out within the Level 2 Strategic Flood Risk Assessment (November 2017) and its Addendum (2018).	Proposals on these <i>this</i> sites should address the site specific FRA requirements set out within the Level 2 Strategic Flood Risk Assessment (November 2017) and its Addendum (2018).	Changes made to correct wording errors
PM10	Policy COO1 - Land at junction of A38/A4019, Coombe Hill	Enhanced pedestrian connectivity to be provided with Site RES1K (Land at Swan PH) and the services and public transport facilities within the village	Enhanced pedestrian connectivity to be provided with Site RES1K <i>COO2</i> (Land at Swan PH) and the services and public transport facilities within the village	Former site reference RES1K was left in error, correct reference is COO2.
PM11	Policy SHU1 - Land at corner of Badgeworth Lane and A46, Shurdington	The site should be planned together with Site SHU4 to form a cohesive development. Proposals must explore and implement opportunities for a vehicular and pedestrian access route to be provided between the two sites and connecting any separate access points to Badgeworth Lane.	The site should be planned together with Site SHU4 to form a cohesive development. Proposals must explore and implement opportunities for a vehicular and pedestrian access route to be provided between the two sites and connecting any separate access points to Badgeworth Lane.	Policy caveat is not necessary as site SHU4 was not included in the Pre-Submission plan and reference was left in error.
PM12	Policy SHU2 – Land north of Leckhampton Lane, Shurdington		<i>Proposals should address the site specific FRA requirements set out within the Level 2 Strategic Flood Risk Assessment (November 2017)</i>	Added to for consistency and in response to comments received from the EA
PM13	Policy FOR1 - Land at corner of Bishops Walk and School Lane, Forthampton	In assessing proposals on this site careful consideration will be given to the design and siting of the development and its effect on the character of the settlement, its historic environment and its rural landscape setting.	In assessing proposals on this site careful consideration will be given to the design and siting of the development and its effect on the character of the settlement, its historic environment and its rural landscape setting. <i>Proposals should have regard to the design guidance within the Forthampton Conservation Area Character Statement (Tewkesbury Borough Council, 2004).</i>	Change has been made as part of the Council's response to comments made by Historic England in relation to the evidence base underpinning the site selection process. A separate historic environment impact assessment has also

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				been produced and added to the evidence base supporting the plan.
PM14	Policy RES4 New housing at other rural settlements	it does not have an adverse cumulative impact on the settlement having regard to other developments permitted during the plan period; as a general rule no more than 5% growth or 10 dwellings, whichever is lesser, will be allowed;	it does not have an adverse cumulative impact on the settlement having regard to other developments permitted during the plan period; as a general rule no more than 5% growth or 10 dwellings <i>during the plan period</i> , whichever is lesser, will be allowed;	Change has been made to provide clarity over what the limit of 5% restriction will relate to. Whilst the reasoned justification to RES4 already makes it clear that the 5% growth or 10 dwellings (whichever is lesser) restriction will be measured from as the settlement existed at the start of the plan period (para 3.29), additional wording to this effect has been added to the policy itself. Further wording has also been added to para 3.29 to clarify that 5% growth will be measured in relation to the existing number of dwellings at the settlement (as it existed at the start of the plan period)
PM15	Para 3.29 (Policy RES4)	Some rural settlements, however, have greater sustainability credentials than others and may, for example, have 'everyday' facilities, such as a shop/ post office, a (non-fee paying) school, and/or good public transport access to neighbouring service / employment centres. Availability of everyday	Some rural settlements, however, have greater sustainability credentials than others and may, for example, have 'everyday' facilities, such as a shop/ post office, a (non-fee paying) school, and/or good public transport access to neighbouring service / employment centres. Availability of everyday facilities is important in helping to reduce unnecessary traffic movements and	As above

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		<p>facilities is important in helping to reduce unnecessary traffic movements and engendering a sense of community, which helps to prevent 'social isolation'. The scale of development that will be acceptable under this policy will therefore be very small. Careful consideration must also be given to the cumulative effects of development over the plan period so to avoid levels of development that are disproportionate to the scale, function and accessibility of the settlement, and to prevent piecemeal encroachment into open countryside and the consequent erosion of the Borough's rural character. As such, as a general rule no more than 5% growth or 10 dwellings, whichever is lesser, will be allowed at these rural settlements. This will be measured from as the settlement existed at the start of the plan period.</p>	<p>engendering a sense of community, which helps to prevent 'social isolation'. The scale of development that will be acceptable under this policy will therefore be very small. Careful consideration must also be given to the cumulative effects of development over the plan period so to avoid levels of development that are disproportionate to the scale, function and accessibility of the settlement, and to prevent piecemeal encroachment into open countryside and the consequent erosion of the Borough's rural character. As such, as a general rule no more than 5% growth (<i>based on the number of existing dwellings in the settlement</i>) or 10 dwellings, whichever is lesser, will be allowed at these rural settlements. This will be measured from as the settlement existed at the start of the plan period.</p>	
PM16	Policy RES5 New Housing Development	<p>In considering proposals for new housing development regard will be had to the following principles, as appropriate. Proposals should:</p>	<p>In considering proposals for new housing development regard will be had to the following principles, as appropriate. Proposals should:</p> <ul style="list-style-type: none"> <i>Make provision for the delivery of efficient and effective high-quality household waste collection services that supports the implementation of the waste hierarchy and encourages the practice of resource efficiency and waste reduction</i> 	<p>Response from County Council Minerals & Waste Authority requested that an additional policy point is added to caveats in RES5. Although covered by the Gloucestershire Waste Core Strategy it is considered that this addition would provide clarity to this policy to make further reference to the need</p>

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				for adequate waste management.
PM17	Policy RES6 Rural Exception Sites	In all cases affordable housing units will be restricted in perpetuity to occupation by households with a member in housing need as defined above.	In all cases <i>the letting of</i> affordable housing units will be restricted in perpetuity to occupation by households with a member in housing need as defined above.	Response from Forest of Dean District Council (FODDC) requests 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 as defined above. This is not practical this would require an RP to undertake regular financial assessments of the household's income to determine if they are still in housing need. Policy has therefore been amended to make it clear that the restriction in perpetuity relates to the letting of the unit rather than its ongoing occupation
PM18	Policy RES7 - Re-use of rural buildings for residential use	The re-use and conversion of redundant buildings in the rural areas (the areas located outside of defined settlement boundaries) for residential use will be permitted provided that:	The re-use and conversion of redundant buildings in the rural areas (the areas located outside of defined settlement boundaries) for residential use will be permitted provided that: <i>5. The proposal can mitigate the impact on any protected species that may be caused by the conversion.</i>	Gloucestershire County Council has requested reference to protected species in this policy. While this is already covered by existing legislation and national policy it is considered that an additional policy point

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				to cover this issue would add clarity.
PM19	Para 3.40 (Policy RES7)	The objective of Policy RES7 is to enable the re-use and conversion of existing rural buildings that are capable of functioning as new dwellings without the need for substantial new building works. Proposals involving new works that are tantamount to a rebuild will not be acceptable under Policy RES7. The Council may request evidence to demonstrate that the building proposed to be converted is redundant in situations where this is unclear from the information provided with the application and from observations on site	The objective of Policy RES7 is to enable the re-use and conversion of existing, <i>redundant</i> rural buildings that are capable of functioning as new dwellings without the need for substantial new building works. Proposals involving new works that are tantamount to a rebuild will not be acceptable under Policy RES7. <i>The Council may request evidence to demonstrate that the building proposed to be converted is redundant in situations where this is unclear from the information provided with the application and from observations on site.</i>	Changes made to reinforce that policy applies to redundant buildings and making it clear that evidence may be required to demonstrate this
PM20	Policy RES11 Change of use of agricultural land to domestic garden	Planning permission will be granted for the change of use of agricultural land to domestic garden providing that: <ol style="list-style-type: none"> 1. there is no adverse environmental or visual impact on the form, character or setting of the settlement 2. there is no significant encroachment into the surrounding countryside, and 3. the form of the extension is not incongruous with the characteristic pattern of surrounding gardens. 	Planning permission will be granted for the change of use of agricultural land to domestic garden providing that: <ol style="list-style-type: none"> 1. there is no adverse environmental or visual impact on the form, character or setting of the settlement 2. there is no significant encroachment into the surrounding countryside,and 3. the form of the extension is not incongruous with the characteristic pattern of surrounding gardens, <i>and</i> 4. <i>the land-use change would not have a significant impact on local ecological networks (identified in Local Nature Recovery Strategies) or deliver a net loss of priority habitat.</i> 	Response from Gloucestershire Wildlife Trust (GWT) raises concern that policy is unlikely to be compliant with the forthcoming Environment Act. Requested that policy is amended to make it clear that planning permission should only be granted where the land-use change would not have a significant impact on local ecological networks or deliver a net loss of priority habitat.

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				Changes have also been made to the reasoned justification to the policy (Para 3.59)
PM21	Para 3.59 (Policy RES11)	Care must be taken when assessing proposals for the extension of residential gardens into agricultural land to ensure that this does not adversely affect the environment of the area through, for example, both the domestic landscaping of the garden, but also the future introduction of features such as sheds, areas of hardstanding, drying areas or garages. Within the Green Belt and Area of Outstanding Natural Beauty such proposals will not normally be permitted given the objectives of these designations. Where permission is granted in accordance with this policy, this must not be taken to imply that the enlarged curtilage is automatically appropriate for the extension of the existing dwelling, or the construction of new buildings. Such proposals will be assessed in relation to the relevant policies of this Plan.	Care must be taken when assessing proposals for the extension of residential gardens into agricultural land to ensure that this does not adversely affect the environment of the area through, for example, both the domestic landscaping of the garden, but also <i>and the</i> future introduction of features such as sheds, areas of hardstanding, drying areas or garages. <i>Furthermore, where agricultural land forms part of a local ecological network its change of use to domestic garden may result in the erosion and fragmentation of the network and the loss of priority habitat.</i> Within the Green Belt and Area of Outstanding Natural Beauty such proposals will not normally be permitted given the objectives of these designations. Where permission is granted in accordance with this policy, this must not be taken to imply that the enlarged curtilage is automatically appropriate for the extension of the existing dwelling, or the construction of new buildings. Such proposals will be assessed in relation to the relevant policies of this Plan.	As above
PM22	Policy RES12 Affordable housing	Where there is an issue relating to the viability of development that impacts on delivery of the full affordable housing requirement, developers should consider: i. Varying the housing mix and design of the scheme in order to reduce costs whilst having regard to the	Where there is an issue relating to the viability of development that impacts on delivery of the full affordable housing requirement, developers should consider: i. Varying the housing mix, <i>tenure mix</i> and design of the scheme in order to reduce costs whilst having regard to the requirements of other	Response from FODDC suggest that there is a need to consider also varying the tenure mix to aid viability

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		requirements of other policies in the plan and the objective of creating a balanced housing market;			policies in the plan and the objective of creating a balanced housing market;			
PM23	Policy EMP1 Major Employment Sites	Location	Site	TBP Extension (Ha)	Emp1	Site	TBP Extension (Ha)	The proposed allocation has now received planning permission for 215 dwellings and 2.24ha of employment land (18/00249/OUT). Therefore the employment site allocation has been amended to reflect this.
		Bishops Cleeve	Cleeve Business Park Malvern View Business Park	- 15.9ha	Bishops Cleeve	Cleeve Business Park Malvern View Business Park	- 15.9ha 2.24ha	
PM24	Policy EMP1 Major Employment Sites	Location	Site	TBP Extension (Ha)	Location	Site	TBP Extension (Ha)	A submission has been received from Gloucestershire Airport promoting further land (in addition to the already proposed extensions to Meteor and Bamfurlong Business Parks) totalling 8.5ha. This is an opportunity for further land at an existing successful employment area and supporting the objectives of the GFirst SEP and Tewkesbury's Council Plan, particularly regarding the strategic importance of the airport.
		Churchdown/Staverton	Staverton Technology Park Meteor Business Park Ashville Business Park Bamfurlong Industrial Park	- 1.3ha 3.9ha 4.2ha	Churchdown/Staverton	Staverton Technology Park Meteor Business Park Ashville Business Park Bamfurlong Industrial Park Gloucestershire Airport	- 1.3ha 3.9ha 4.2ha 8.5ha	
PM25	Para 4.7	Proposals for non-B-class uses will therefore not normally be supported at Major			Proposals for non-B-class uses will therefore not normally be supported at Major Employment Sites.			Response from County Council Minerals & Waste Authority

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	(Policy EMP1 Major Employment Sites)	Employment Sites. However, some limited non B-class uses may be supported where they provide ancillary and complementary services that would supplement the operation of the employment area. It is recognised, for example, that some serviced-based industries, such as nurseries, gyms, food outlets, can often help to promote the vitality of employment areas.	However, some limited non B-class uses may be supported where they provide ancillary and complementary services that would supplement the operation of the employment area. It is recognised, for example, that some serviced-based industries, such as nurseries, gyms, food outlets, can often help to promote the vitality of employment areas. <i>Furthermore, some employment generating infrastructure operations, such as waste and water management facilities can also be appropriate.</i>	requested that the potential for waste infrastructure to be suitable on employment sites. While Policy EMP1 does not restrict this, it is considered that additional wording in the reasoned justification could help clarify this.												
PM26	Policy EMP2 – site allocations table.	<table border="1"> <thead> <tr> <th>Location</th> <th>Site</th> <th>TBP Extension (Ha)</th> </tr> </thead> <tbody> <tr> <td>Deerhurst</td> <td>Highfield Farm</td> <td>2.7ha</td> </tr> </tbody> </table>	Location	Site	TBP Extension (Ha)	Deerhurst	Highfield Farm	2.7ha	<table border="1"> <thead> <tr> <th>Location</th> <th>Site</th> <th>TBP Extension (Ha)</th> </tr> </thead> <tbody> <tr> <td>Deerhurst Elmstone <i>Hardwicke</i></td> <td>Highfield Farm</td> <td>2.7ha</td> </tr> </tbody> </table>	Location	Site	TBP Extension (Ha)	Deerhurst Elmstone <i>Hardwicke</i>	Highfield Farm	2.7ha	Error in location of Highfield Farm. Site is located in the parish of Elmstone Hardwicke.
Location	Site	TBP Extension (Ha)														
Deerhurst	Highfield Farm	2.7ha														
Location	Site	TBP Extension (Ha)														
Deerhurst Elmstone <i>Hardwicke</i>	Highfield Farm	2.7ha														
PM27	Policy EMP5 New Employment Development (General)	2. There is provision for safe and convenient access by sustainable appropriate transport modes, commensurate with the scale and nature of the proposed development and the location of the site;	2. There is provision for safe and convenient access by <i>sustainable</i> appropriate transport modes, commensurate with the scale and nature of the proposed development and the location of the site;	Request from Gloucestershire County Council – Public Health to make the policy less ambiguous and support sustainable travel patterns.												
PM28	Policy EMP5 New Employment Development (General)	Proposals for new employment development that are acceptable in principle in accordance with policies EMP1 – EMP4 will be permitted, subject to the application of other plan policies, where the following criteria are satisfied:	Proposals for new employment development that are acceptable in principle in accordance with policies EMP1 – EMP4 will be permitted, subject to the application of other plan policies, where the following criteria are satisfied: <i>Provision can be made for efficient and effective management of waste from the site that supports the</i>	Response from County Council Minerals & Waste Authority requested that an additional policy point is added to caveats in EMP5. Although covered by the Gloucestershire Waste Core Strategy it is considered that this addition would provide												

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			<i>waste hierarchy and encourages resource efficiency and waste reduction.</i>	clarity to this policy to make further reference to the need for adequate waste management.
PM29	Para 4.29 (Policy EMP5 New Employment Development (General))		<i>4.30. Employment development should contribute towards waste minimisation and support the delivery of a network of sustainable waste management facilities. As such, new development should ensure that it can contribute to the delivery of efficient and effective high quality commercial waste collection services that support the implementation of the waste heirarchy and encourage the practice of resource efficiency and waste reduction. It should also facilitate the on-site and/or proximal management of waste, inc including through support for complementary activities such as utilising the services of existing neighbouring or nearby waste management facilities.</i>	New paragraph to add further detail to the additional policy caveat to Policy EMP5 relating to waste management for new employment development.
PM30	Para 4.32 (Policy EMP6 Safeguarding of Employment Sites)		<i>Waste management sites are specifically safeguarded by the Gloucestershire Waste Core Strategy and the loss of existing or allocated sites will normally be safeguarded by the local planning authority in consultation with the waste planning authority. This also extends to proposed neighbouring uses that may prejudice the use of a site for waste management.</i>	Response from County Council Minerals & Waste Authority requested that specific reference is made to the safeguarding of waste facilities set out in the Waste Core Strategy. Although covered by the Waste Core Strategy it is considered that additional text to the reasoned justification to Policy EMP6 would provide clarity.
PM31	Policy AGR1 Agricultural Development	Proposals for new agricultural development, including intensive and industrial scale agricultural operations, to meet the needs of	Proposals for new agricultural development, including intensive and industrial scale agricultural operations, to	Comments from GWT request this inclusion as agricultural development can have a

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		<p>the agricultural business will be permitted provided that, where appropriate:</p> <ol style="list-style-type: none"> 1. The proposed development is reasonably necessary and designed for the purposes of agriculture. 2. The proposed development is well sited in relation to existing buildings, access tracks, ancillary structures and works, and landscape features in order to minimise adverse impact on the visual amenity of the rural landscape paying particular regard to Areas of Outstanding Natural Beauty, Special Landscape Areas and the Landscape Protection Zone. 3. The proposed development is sympathetically designed in terms of height, mass, materials, colour and landscaping where appropriate 4. There is no unacceptable adverse impact on the amenity of residential properties or any other protected buildings, including affects from noise, light or odour pollution, including on human health. 5. Arrangements for the storage and/or disposal of waste (including manure and slurry) are satisfactory and do not have an unacceptable impact on air quality or threaten the quality of ground or surface water 6. The highway network (including site access and egress) is adequate to safely 	<p>meet the needs of the agricultural business will be permitted provided that, where appropriate:</p> <ol style="list-style-type: none"> 1. The proposed development is reasonably necessary and designed for the purposes of agriculture. 2. The proposed development is well sited in relation to existing buildings, access tracks, ancillary structures and works, and landscape features in order to minimise adverse impact on the visual amenity of the rural landscape paying particular regard to Areas of Outstanding Natural Beauty, Special Landscape Areas and the Landscape Protection Zone. 3. The proposed development is sympathetically designed in terms of height, mass, materials, colour and landscaping where appropriate 4. There is no unacceptable adverse impact on the amenity of residential properties or any other protected buildings, including affects from noise, light or odour pollution, including on human health. 5. <i>There is no unacceptable impact on biodiversity and ecological impacts.</i> 6. Arrangements for the storage and/or disposal of waste (including manure and slurry) are satisfactory and do not have an unacceptable impact on air quality or threaten the quality of ground <i>water</i>, or surface water <i>or nearby watercourses.</i> 7. The highway network (including site access and egress) is adequate to safely cater for the type and volume of traffic generated by the proposal. 	<p>significant impact on ecology (new point 5).</p> <p>Comments from Gloucestershire County Council, as Lead Local Flood Authority, requested an addition to consider the impacts the storage and disposal of waste on local watercourse (point 6)</p>

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		cater for the type and volume of traffic generated by the proposal.		
PM32	Para 4.35 (Policy AGR1) Agricultural Development	Developments associated with the intensive rearing and accommodation of poultry, pigs or other livestock often give rise to various problems. In particular, the type and scale of such proposals can be seriously harmful to the appearance of the landscape; they can generate significant traffic, including heavy goods vehicles, which can cause serious problems of highway safety when access involves the use of narrow country lanes; and the concentration of livestock in confined conditions can create problems of noise, dust and smell from effluent. Careful control over their location and siting is therefore necessary. In particular, the storage and disposal or waste can have potential implications on air quality and increases in atmospheric nitrogen resulting from ammonia. Proposals for intensive livestock development will be expected to assess the potential impacts on air quality and demonstrate the mitigation against any adverse effects.	Developments associated with the intensive rearing and accommodation of poultry, pigs or other livestock often give rise to various problems. In particular, the type and scale of such proposals can be seriously harmful to both the appearance of the landscape <i>and also of water quality</i> ; they can generate significant traffic, including heavy goods vehicles, which can cause serious problems of highway safety when access involves the use of narrow country lanes; and the concentration of livestock in confined conditions can create problems of noise, dust and smell from effluent. Careful control over their location and siting is therefore necessary. In particular, the storage and disposal or waste can have potential implications on air <i>and water</i> quality and increases in atmospheric nitrogen resulting from ammonia. Proposals for intensive livestock development will be expected to assess the potential impacts on air <i>and water</i> quality and demonstrate the mitigation against any adverse effects.	Minor amendments to text supporting the policy to reflect suggested changes to policy text around water quality.
PM33	Green Belt Para 5.4	Shurdington is entirely surrounded by Green Belt and, as of May 2017, there had only been 7 new dwellings committed at the village within the plan period.	Shurdington is entirely surrounded by Green Belt and, as of <i>April 2019</i> May 2017 , there had only been <i>15</i> 7 new dwellings committed at the village within the plan period.	Figure for residential commitments at Shurdington had not been updated with the latest figure.
PM34	Policy GRB1 – Green Belt Review		<i>7. 8.6ha land at Gloucestershire Airport, adjacent to Meteor Business Park and Bamfurlong Industrial Park, Staverton</i>	A submission has been received from Gloucestershire Airport promoting further land

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				(in addition to the already proposed extensions to Meteor and Bamfurlong Business Parks) totalling 8.5ha. This is an opportunity for further land at an existing successful employment area and supporting the objectives of the GFirst SEP and Tewkesbury's Council Plan, particularly regarding the strategic importance of the airport.
PM35	Para 5.11 (Policy GRB1 – Green Belt Review)	The Green Belt review sets out a number potential mitigation measures for each of these sites which are aimed at minimising any harm to the remainder of the Green Belt. Policy RES1 of this plan makes these mitigation measures a policy requirement through site specific policies RES1P, RES1Q and RES1S.	5.11. The Green Belt review sets out a number potential mitigation measures for each of these sites which are aimed at minimising any harm to the remainder of the Green Belt. Policy RES1 of this plan makes these mitigation measures a policy requirement through site specific policies SHU1RES1P, RES1Q and SHU2RES1S .	Typographical error. The wording contained old policy references that need to be updated.
PM36	Para 6.8 (RET1 Policy RET1 Maintaining the vitality and viability of the town, borough and local centres)	The local centres provided within the JCS Strategic Allocations will have the same status as the Local Centres identified within Policy RET1 and defined on the proposals map and will be subject to the provisions of the policy.	The local centres provided within the JCS Strategic Allocations will have the same status as the Local Centres identified within Policy RET1 and defined on the proposals map and will be subject to the provisions of the policy. <i>This includes the allocations at A1 Innsworth & Twigworth, A2 South Churchdown, A3 North Brockworth, A4 North West Cheltenham and A7 West Cheltenham.</i>	A comment requested that the JCS allocations expected to contain local centres should be identified for clarity.

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PM37	Policy RET2 Tewkesbury Town Centre and Primary Frontages	<p>Within the Tewkesbury Town Centre Boundary, as defined on the Policies Map (excluding the Primary Shopping Frontages), proposals for main town centre uses and residential uses will be supported.</p> <p>Within the Tewkesbury Town Centre ground floor Primary Shopping Frontages, as defined on the Policies Map, proposals for Class A1 retail uses will be supported. The change of use from Class A1 retail will be permitted provided that:</p> <ol style="list-style-type: none"> 1. A minimum of 60% of units within 100M of the centre point of the frontage of the application site (where this measurement is within the primary shopping frontage area) would be within Class A1; and 2. The alternative use proposed is an appropriate main town centre use which contributes towards the vitality and viability of the primary frontage <p>Proposals that do not meet the requirements of point 1 of this policy will only be accepted in exceptional circumstances where it can be demonstrated that an existing town centre unit is unviable and unsuitable for Class A1 use.</p> <p>Proposals involving the change of use from other main town centre uses (those not</p>	<p>Within the Tewkesbury Town Centre Boundary, as defined on the Policies Map (excluding the Primary Shopping Frontages), proposals for main town centre uses and residential uses will be supported.</p> <p>Within the Tewkesbury Town Centre ground floor Primary Shopping Area Frontages, as defined on the Policies Map, proposals for Class A1 retail uses will be supported. The change of use from Class A1 retail will be permitted provided that:</p> <ol style="list-style-type: none"> 1. A minimum of 60% of units within 100M of the centre point of the frontage of the application site (where this measurement is within the primary shopping area frontage area) would be within Class A1; and 2. The alternative use proposed is an appropriate main town centre use which contributes towards the vitality and viability of the primary shopping area frontage <p>Proposals that do not meet the requirements of point 1 of this policy will only be accepted in exceptional circumstances where it can be demonstrated that an existing town centre unit is unviable and unsuitable for Class A1 use.</p> <p>Proposals involving the change of use from other main town centre uses (those not falling with Class A1) within the Primary Shopping Area Frontages will be permitted where the alternative use proposed is also a main town centre use. On upper floors within the Primary</p>	Change in terminology required to reflect the latest NPPF.

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
		falling with Class A1) within the Primary Shopping Frontages will be permitted where the alternative use proposed is also a main town centre use. On upper floors within the Primary Shopping Frontages, proposals for residential use and main town centre uses will be supported.	Shopping Area Frontages , proposals for residential use and main town centre uses will be supported.	
PM38	Para 6.12, 6.13 and 6.15 (Policy RET2 Tewkesbury Town Centre and Primary Frontages)	Tewkesbury High Street is the main focus of retailing activity with the Borough. It provides a range of shopping facilities in an easily accessible and convenient location for many residents, as well as providing a wider role in supporting the local economy. As such retaining and enhancing its vitality and viability is a priority. Of particular importance is securing attractive continuous shopping frontages for pedestrians. The shopping focus of the High Street containing the main concentration of A1 retail outlets is defined on the Policies Map as the primary shopping frontage. Tewkesbury Borough Council is concerned that a higher proportion of A2 –A5 uses within these prime areas could threaten the vitality and viability of the centre as a whole. However, the contribution of non-A1 town centre uses towards the success of the primary shopping area should also be recognised. Therefore a flexible approach is taken where non-A1 development may be permitted providing that the predominance of A1 units a ground floor level is maintained within these areas.	Tewkesbury High Street is the main focus of retailing activity with the Borough. It provides a range of shopping facilities in an easily accessible and convenient location for many residents, as well as providing a wider role in supporting the local economy. As such retaining and enhancing its vitality and viability is a priority. Of particular importance is securing attractive continuous shopping frontages for pedestrians. The shopping focus of the High Street containing the main concentration of A1 retail outlets is defined on the Policies Map as the primary shopping area frontage . Tewkesbury Borough Council is concerned that a higher proportion of A2 –A5 uses within these prime areas could threaten the vitality and viability of the centre as a whole. However, the contribution of non-A1 town centre uses towards the success of the primary shopping area frontages should also be recognised. Therefore a flexible approach is taken where non-A1 development may be permitted providing that the predominance of A1 units a ground floor level is maintained within these areas. Within the Primary Shopping Area Frontages the Borough Council will seek to retain at least 60% of the frontages primary shopping area within retail use (Class A1) at ground floor level. 100m will be measured using	Change in terminology required to reflect the latest NPPF.

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
		<p>Within Primary Frontages the Borough Council will seek to retain at least 60% of the primary shopping area within retail use (Class A1) at ground floor level. 100m will be measured using the centre point of the frontage of the application site (i.e. 50m in either direction). Where this centre point is within 50m of the edge of the primary shopping frontage, then the measurement will be up to 50m in either direction, but will not continue beyond the primary shopping area designation.</p> <p>Outside of the primary shopping frontages the approach taken in the remainder of town centre is for a wide range of uses that contribute towards the vitality and viability of the town. The proposal maps show the town centre boundary.</p>	<p>the centre point of the frontage of the application site (i.e. 50m in either direction). Where this centre point is within 50m of the edge of the primary shopping frontage, then the measurement will be up to 50m in either direction, but will not continue beyond the primary shopping frontage <i>area</i> designation.</p> <p>Outside of the primary shopping <i>area</i> frontages the approach taken in the remainder of town centre is for a wide range of uses that contribute towards the vitality and viability of the town. The proposal maps show the town centre boundary.</p>	
PM39	Policy RET4 Out of Centre Development	<p>Proposals for main town centre uses, on sites located outside of designated centres, will only be permitted where a sequential approach has been followed and it is demonstrated that:</p> <p>i. If edge-of-centre, that there will be no significant adverse impact on the overall vitality and viability of an existing centre and that the</p>	<p>Proposals for main town centre uses, on sites located outside of designated centres, will only be permitted where a sequential approach has been followed and it is demonstrated that:</p> <p>i. If edge-of-centre, that there will be no significant adverse impact on the overall vitality and viability of an existing centre and that the proposals cannot be accommodated within a designated centre. the proposals cannot be accommodated within a designated centre <i>and</i>,</p>	Typographical error in final paragraph and changes made to clarify approach to impact assessment.

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
		<p>proposals cannot be accommodated within a designated centre.</p> <p>ii. If out-of-centre, that there will be no significant adverse impact on the overall vitality and viability of an existing centre and that the development is not capable of being located in a sequentially preferable location.</p> <p>All proposals for retail and leisure development above the gross floorspace threshold set out in the NPPF, and not within a designated centre or on sites allocated for that use, be required to submit a full Impact Assessment.</p>	<p><i>where proposal is above the threshold for an impact assessment, there will be no significant adverse impact on the overall vitality and viability of an existing centre.</i></p> <p>ii. If out-of-centre, that there will be no significant adverse impact on the overall vitality and viability of an existing centre and that the development is not capable of being located in a sequentially preferable location <i>and, where proposal is above the threshold for an impact assessment, there will be no significant adverse impact on the overall vitality and viability of an existing centre.</i></p> <p>All proposals for retail and leisure development above the gross floorspace threshold set out in the NPPF, and not within a designated centre or on sites allocated for that use, <i>will</i> be required to submit a full Impact Assessment.</p>	
PM40	Policy RET8 Agricultural/ Horticultural Retail in the countryside	<p>Proposals for new farm shops and garden centres in the countryside, as well as extensions to them, will be permitted where they are directly related and ancillary to an existing agricultural or horticultural business and the majority of the produce/products for sale are produced on the premises or holding.</p> <p>Proposals for new farm shops that are not in accordance with the first requirement of this policy may be considered favourably where</p>	<p>Proposals for new farm shops and garden centres in the countryside, as well as extensions to them <i>existing premises</i> , will be permitted where they are directly related and ancillary to an existing agricultural or horticultural business and the majority of the produce/products for sale are produced on the premises or holding.</p> <p>Proposals for new farm shops that are not in accordance with the first requirement of this policy may be considered favourably where the majority of products sold would be produced in the local area and relate to</p>	Representation by RPS on behalf of Robert Hitchens Ltd objects to policy as it remains unclear how extensions/additions to existing farm shops and garden centres will be assessed in a situation where proposals are not directly related and ancillary to existing uses.

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
		<p>the majority of products sold would be produced in the local area and relate to agriculture, horticulture and other rural industries; where it can be demonstrated that there are no suitable alternative premises/sites in nearby settlements, and where the Council is satisfied that the proposal would not adversely affect the viability or vitality of local shopping facilities.</p> <p>Proposals not in accordance with the provisions set out above will be considered against Policy RET4.</p>	<p>agriculture, horticulture and other rural industries; where it can be demonstrated that there are no suitable alternative premises/sites in nearby settlements, and where the Council is satisfied that the proposal would not adversely affect the viability or vitality of local shopping facilities.</p> <p>Proposals not in accordance with the provisions set out above will be considered against Policy RET4.</p>	<p>Changes have been made to clarify that RET8 will apply to extensions to existing premises (that are directly related to horticulture/agriculture etc), however the policy is considered to be clear in its approach to proposals that are not directly related and ancillary to existing uses – these will be treated in the same way as general retail proposals and will be subject to RET4 and the NPPF advice on ensuring the vitality of town centres. The intention of RET8 is to provide a positive policy that would allow for limited exceptions to normal retail policy due to them having a need for a rural location</p>
PM41	Para 6.36 (Policy RET9 - Tewkesbury Town Regeneration)	All proposals on the site should also achieve an overall enhancement to the site's biodiversity value and its contribution to the green infrastructure network; including by avoiding (or mitigating) harm to the designated Key Wildlife Site (Tewkesbury Disused Railway Line), ensuring the retention and long term protection of the mature trees on site subject to a Tree Preservation Order (No. 229) and delivering biodiversity/green	All proposals on the site should also achieve an overall enhancement to the site's biodiversity value and its contribution to the green infrastructure network; including by avoiding (or mitigating) harm to the designated Local Key Wildlife Site (Tewkesbury Disused Railway Line), ensuring the retention and long term protection of the mature trees on site subject to a Tree Preservation Order (No. 229) and delivering biodiversity/green infrastructure enhancements either	Reference to 'Key Wildlife Site' should be changed to 'Local Wildlife Site' following a change in terminology by the Local Nature Partnership in 2019.

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
		infrastructure enhancements either within the site itself or to the wider Key Wildlife Site/green corridor.	within the site itself or to the wider Local Key Wildlife Site/green corridor.	
PM42	Para 7.23 (Policy HER2 Listed Building)	Technical advice, or information on where to obtain it will be offered by the Council's Conservation Officer and/or English Heritage.	Technical advice, or information on where to obtain it will be offered by the Council's Conservation Officer <i>Specialist</i> and/or Historic England English Heritage.	Typographical error.
PM43	Para 7.26 (Policy HER3 Historic Parks and Gardens)	English Heritage has published a Register of Parks and Gardens of Special Historic Interest.	Historic England English Heritage has published a Register of Parks and Gardens of Special Historic Interest.	Typographical error.
PM44	Para 7.26 (Policy HER3 Historic Parks and Gardens)		<i>There are also historic parks and gardens that are non-registered assets. Such parks and gardens will be considered as non-designated heritage assets under Policy HER5 and may be identified on any 'local list' that the council produce. Further is available through the Gloucestershire Historic Environment Record and the Gloucestershire Historic Landscape Characterisation archives and should also be consulted.</i>	New paragraph in supporting text to clarify the position on parks and gardens that are not registered through Historic England.
PM45	Policy HER4 Archaeological Sites and Scheduled Monuments	Where development will cause harm or loss, provision should be made for excavation and recording with an appropriate assessment and evaluation. The appropriate publication/ curation of findings will be expected.	Where development will cause harm or loss, <i>as identified after an appropriate assessment and evaluation</i> , provision should be made for excavation and recording, with the an appropriate assessment and evaluation <i>publication and curation of the archive</i> . The appropriate publication/ curation of findings will be expected.	Gloucestershire County Council suggested rewording of policy to provide clarity on the required process.
PM46	Policy HER5 Locally Important Heritage Assets	Policy HER5 Locally Important Heritage Assets Locally Important Heritage Assets will be conserved having regard to the significance	Policy HER5 Locally Important <i>Non-Designated</i> Locally Important Heritage Assets <i>Non-designated</i> Locally Important Heritage Assets will be conserved having regard to the significance of the	It considered more appropriate to refer to these type of heritage assets as 'non-designated' to reflect their status as not statutory listed assets.

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		<p>of the asset and its contribution to the historic character of the area.</p> <p>Proposals affecting a Locally Important Heritage Asset and/or its setting will be expected to sustain or enhance the character, appearance and significance of the asset.</p>	<p>asset and its contribution to the historic character of the area.</p> <p>Proposals affecting a <i>Non-designated</i> Locally Important Heritage Asset and/or its setting will be expected to sustain or enhance the character, appearance and significance of the asset.</p>	
PM47	Paras 7.31 & 7.32 (Policy HER5 Locally Important Heritage Assets)	<p>Across Tewkesbury Borough there are a wide range of locally important heritage assets that do not benefit from a national statutory designation such as Listed Building status. However, these assets still have an important contribution to the heritage of the area and the character of the environment. These non-designated assets will be identified on the Council's 'Local List' which it intends to publish in due course. However, further local heritage asset information is available through the Gloucestershire Historic Record and should also be consulted. The retention and preservation of these heritage assets will be sought and proposals to conserve them will be supported. Any proposals to remove or alter these assets will be assessed against the significance of the asset, the impact on the features that make the asset important and impact that the proposal would have on wider the character of the area.</p>	<p>Across Tewkesbury Borough there are a wide range of <i>non-designated</i> locally important heritage assets that do not benefit from a national statutory designation such as Listed Building status. However, these assets still have an important contribution to the heritage of the area and the character of the environment. <i>The Council is working to produce a 'local list' to provide a live resource of such non-designated assets, including principles and criteria for listing. However, the local list cannot be exhaustive and will not determine what assets will be subject to this policy. Assets may also be identified by the Council as part of the planning application process</i> These non-designated assets will be identified on the Council's 'Local List' which it intends to publish in due course. However, further local heritage asset information is available through the Gloucestershire Historic Record and should also be consulted. The retention and preservation of these heritage assets will be sought and proposals to conserve them will be supported. Any proposals to remove or alter these assets will be assessed against the significance of the asset, the impact on the features that make the asset important and impact that the</p>	<p>It considered more appropriate to refer to these type of heritage assets as 'non-designated' to reflect their status as not statutory listed assets.</p> <p>Wording regarding the local list has been amended to clarify that it cannot be a complete resource of all non-designated assets in the Borough.</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
		Locally important heritage assets also include non-designated archaeological assets across the Borough that also make a valuable contribution to the area's heritage. Proposals for new development should to preserve these where possible and, where appropriate, provision should be made for excavation and recording with an appropriate assessment and evaluation in line with Policy HER4.	proposal would have on wider the character of the area. Locally important <i>Non-designated</i> Locally important heritage assets also include non-designated archaeological assets across the Borough that also make a valuable contribution to the area's heritage. Proposals for new development should to preserve these where possible and, where appropriate, provision should be made for excavation and recording with an appropriate assessment and evaluation in line with Policy HER4.	
PM48	Para 8.9 (Policy LAN2 Landscape Protection Zone)	The Landscape Protection Zone seeks to protect, enhance and conserve the riparian landscape of the river valley including the floodplain, tributaries lined with trees, adjacent hills and areas of visual and ecological importance, such as woodland, orchards, copses, hedgerows, key wildlife sites, parkland areas and examples of traditional vernacular architecture, all of which contribute to the overall landscape quality and character of the area.	The Landscape Protection Zone seeks to protect, enhance and conserve the riparian landscape of the river valley including the floodplain, tributaries lined with trees, adjacent hills and areas of visual and ecological importance, such as woodland, orchards, copses, hedgerows, <i>local</i> key wildlife sites, parkland areas and examples of traditional vernacular architecture, all of which contribute to the overall landscape quality and character of the area.	Reference to 'Key Wildlife Site' should be changed to 'Local Wildlife Site' following a change in terminology by the Local Nature Partnership in 2019.
PM49	Appendix 2 (Policy LAN4 Locally Important Open Spaces)	Appendix 2 lists the Important Open Spaces together with a summary of their reason for designation.	Appendix 2 lists the Important Open Spaces together with a summary of their reason for designation. 'Victoria Gardens, Tewkesbury' is added to Appendix 2	Response from Tewkesbury Civic Society highlights that 'Victoria Gardens, Tewkesbury' is not listed at Appendix 2.
PM50	Para 8.28 (Policy LAN5 Local Green Spaces)	Further Local Green Spaces may be identified in Neighbourhood Plans providing they meet	Further Local Green Spaces may be identified in Neighbourhood Plans <i>and through any future review of</i>	CPRE strongly supports the designation of Local Green Space. But the wording of this section implies that additional

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		the relevant criteria within the National Planning Policy Framework.	<i>the local plan</i> providing they meet the relevant criteria within the National Planning Policy Framework.	LGS can only be designated via a Neighbourhood Development Plan. There needs to be an alternative mechanism for designation to cater for circumstances where a NDP is inappropriate.
PM51	Policy NAT1 Biodiversity, Geodiversity and Important Natural Features	<p>Development proposals that will conserve, and where possible restore and/or enhance, biodiversity will be permitted.</p> <p>Proposals will, where applicable, be required to deliver a biodiversity net gain across local and landscape scales, including designing wildlife into development proposals, the connection of sites and large-scale habitat restoration, enhancement and habitat re-creation. Locally defined ecological networks will be the primary focus for landscape scale net gain delivery.</p> <p>Proposals that are likely to have a significant effect on an internationally designated habitats site (either alone or in combination with other plans or projects) will not be permitted unless a Habitats Regulations Assessment has concluded that the proposal will not adversely affect the integrity of the habitats site.</p>	<p>Development proposals that will conserve and where possible restore/ and/or enhance, biodiversity will be permitted.</p> <p>Proposals will, where applicable, be required to deliver a biodiversity net gain across local and landscape scales, including designing wildlife into development proposals, the connection of sites and large-scale habitat restoration, enhancement and habitat re-creation. Locally defined ecological networks <i>identified in Local Nature Recovery Strategies</i> will be the primary focus for landscape scale net gain delivery.</p> <p>Proposals that are likely to have a significant effect on a <i>European or</i> internationally designated habitats site (either alone or in combination with other plans or projects) will not be permitted unless a Habitats Regulations Assessment has concluded that the proposal will not adversely affect the integrity of the habitats site.</p> <p>Development likely to result in the loss, deterioration or harm to features, habitats or species of importance to biodiversity, environmental quality or geological</p>	<p>Response from GWT requests that, to make the policy align with the introduction of mandatory net gain through the Environment Act is should be reworded to reflect the fact that enhancements will be mandatory rather than ‘where possible’. This change is required to comply with upcoming legislation.</p> <p>GWT request that the policy should refer to Local Nature Recovery strategies, which are also likely to become statutory within the lifetime of the plan. This change is required for the plan to be consistent with upcoming legislation.</p> <p>It is more accurate to refer to European designated sites as</p>

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		<p>Development likely to result in the loss, deterioration or harm to features, habitats or species of importance to biodiversity, environmental quality or geological conservation, either directly or indirectly, will not be permitted unless:</p> <ul style="list-style-type: none"> a) the need for, and benefits of the development clearly outweigh its likely impact on the local environment, or the nature conservation value or scientific interest of the site; b) it can be demonstrated that the development could not reasonably be located on an alternative site with less harmful impacts; and c) measures can be provided (and secured through planning conditions or legal agreements), that would avoid, mitigate against or, as a last resort, compensate for the adverse effects likely to result from development. <p>The level of protection and mitigation should be proportionate to the status of the feature, habitat or species and its importance individually and as part of a wider network.</p>	<p>conservation, either directly or indirectly, will not be permitted unless:</p> <ul style="list-style-type: none"> d) the need for, and benefits of the development clearly outweigh its likely impact on the local environment, or the nature conservation value or scientific interest of the site; e) it can be demonstrated that the development could not reasonably be located on an alternative site with less harmful impacts; and f) measures can be provided (and secured through planning conditions or legal agreements), that would avoid, mitigate against or, as a last resort, compensate for the adverse effects likely to result from development. <p>The level of protection and mitigation should be proportionate to the status of the feature, habitat or species and its importance individually and as part of a wider network. <i>Development resulting in the loss or deterioration of irreplaceable habitat, including (but not restricted to) ancient woodland and ancient and veteran trees, will not be permitted unless there are wholly exceptional reasons and a suitable compensation strategy exists</i></p>	<p>well as internationally designated.</p> <p>Response from the Woodland Trust requests that NAT1 gives explicit protection of irreplaceable habitats, including ancient woodland and ancient and veteran trees in accordance with NPPF para 175c. Suggest strengthening the wording of the policy. Changes have been made to address these comments. Although NAT1 does give protection to these features when read together with para 8.36, it is considered to be necessary to make explicit provision within the policy wording itself.</p>
PM52	Para 8.32	The Council is mindful of the Government’s intention to make biodiversity net gain a mandatory requirement for new development (DEFRA Net Gain Consultation	The Council is mindful of the Government’s intention to make biodiversity net gain a mandatory requirement for new development (DEFRA Net Gain Consultation proposals (December 2018), <i>DEFRA Net Gain Summary</i>	Response from Peter Brett Associates on behalf of Linden Homes requests that further information be provided on

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
		<p>proposals, December 2018) Policy NAT1 should be interpreted and applied in the context of these emerging proposals and any resulting new national planning policy requirement for mandatory biodiversity net gain. All proposals will be required to deliver a net gain except for those specifically excluded in national policy and guidance.</p>	<p><i>of responses and government response (July 2019), Environment Bill 2019-21 (January 2020)).</i> Policy NAT1 should be interpreted and applied in the context of these emerging proposals and any resulting new <i>statutory</i>/national planning policy requirement for mandatory biodiversity net gain. All proposals will be required to deliver a net gain except for those specifically excluded in <i>the relevant statute and/or</i> national policy and guidance. <i>In the interim period (i.e. prior to the enactment of the Environment Bill and during any statutory transition period) the Council will still expect all developments (with the exception of Permitted Development, Householder developments and proposals involving a material change of use where no operational development involving a loss of habitat is proposed) to deliver a minimum net gain of 10% calculated using the DEFRA Biodiversity Metric (or any updated or replacement metric used as the industry standard). The expectation is for the required net gain to be delivered on site through site specific ecological enhancements (in accordance with Policy NAT3), although the Council recognises that there may be exceptional circumstances where this is not possible in whole or in part, or where the benefits of net gain may be better realised through compensatory measures off site. Where such circumstances can be satisfactorily demonstrated, the Council will consider alternative approaches in consultation with bodies such as the Local Nature Partnership (LNP). In all cases, enhancements must be appropriate to the ecological network. The term 'landscape scale net gain delivery' refers to enhancements to the Nature Recovery Network. Locally</i></p>	<p>how biodiversity net gains should be calculated. For example, the DEFRA metric could be referenced to provide clarity for developers in ensuring a standardised approach to measuring biodiversity net gains.</p> <p>Response from David Lock Associates on behalf of Hallam Land Management also requests clarity over the first paragraph of the policy (Locally defined ecological networks will be the primary focus for landscape scale net gain delivery) as there is no further detail given regarding what constitutes a 'landscape scale net gain delivery'. Hallam consider that Policy NAT1 is not effective as currently drafted.</p> <p>Response from RPS on behalf of Richborough Estates suggests that there may be circumstances where there is limited or no opportunity to secure 'measurable' net gains on site, due for example to</p>

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			<p><i>defined ecological networks (which will be identified in the Local Nature Recovery Strategy being prepared by Gloucestershire Wildlife Trust and identified on the policies map to this plan) will form part of, and contribute to, the Nature Recovery Network.</i></p>	<p>issues of viability. However, as currently drafted, there is an expectation that such gains will be delivered on all development as matter of principle.</p> <p>Changes are required to provide clarity over the application of the policy and how the Council intends to apply it prior to the enactment of the Environment Bill. The requirement of Policy NAT1 for net gain is consistent with the advice at NPPF paragraph 170 for planning policies to contribute and enhance the natural environment by minimising impacts on and providing net gains for biodiversity.</p>
PM53	Para 8.33	<p>Providing net gains in biodiversity is possible for all development proposals from a single house to larger, strategic scale development by measures such as:</p> <ul style="list-style-type: none"> • incorporating bird and bat boxes into the fabric of buildings; • using native trees, shrubs and pollinator friendly planting in 	<p>Providing net gains in biodiversity is possible for all development proposals from a single house to larger, strategic scale development by measures such as <i>which could, for example, include:</i></p> <ul style="list-style-type: none"> • incorporating bird and bat boxes into the fabric of buildings; • using native trees, shrubs and pollinator friendly planting in landscaping schemes (in keeping with the landscape character area); 	<p>Response from GWT advises that the provision of bird and bat boxes should only be included where there is evidence of need and this should not be considered to count toward net gain provision. These features are seldom limiting factors for</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
		<p>landscaping schemes (in keeping with the landscape character area);</p> <ul style="list-style-type: none"> • establishing areas of wildflower meadows, woodland and community orchards within open space, landscaping and other areas adjacent to nearby areas of existing wildlife value; • designing in green roofs or walls; • prioritising the integration of 'green' sustainable drainage systems (SuDS) to benefit wildlife; • restoring connections for wildlife (e.g. hedgerows) and re-moving barriers to movement (e.g. river culverts); and • enhancing, restoring or recreating priority habitat 	<ul style="list-style-type: none"> • establishing areas of wildflower meadows, woodland and community orchards within open space, landscaping and other areas adjacent to nearby areas of existing wildlife value; • designing in green roofs or walls; • prioritising the integration of 'green' sustainable drainage systems (SuDS) to benefit wildlife; • restoring connections for wildlife (e.g. hedgerows) and re-moving barriers to movement (e.g. river culverts); and • enhancing, restoring or recreating priority habitat <p><i>This list is not prescriptive and is provided purely for illustrative purposes. It only provides examples of the kind of measures which alone or in combination may help to deliver gains for biodiversity. Each proposal will present its own specific requirements and opportunities which will determine the nature of interventions required.</i></p>	<p>populations, and therefore, provision can be of limited benefit compared to habitat creation and enhancement.</p> <p>This change is made to clarify that the measures listed at para 8.33 are purely illustrative and do not provide a prescription for delivering biodiversity net gain</p>
PM54	Para 8.34	<p>Simple measures can also be put in place to avoid creating additional barriers for wildlife, such as designing in gaps in garden fences and joining up landscaped areas with open spaces and habitat areas to facilitate movement for wildlife.</p>	<p>Simple measures can also be put in place to avoid creating additional barriers for wildlife, such as designing in gaps in garden fences and joining up landscaped areas with open spaces and habitat areas to facilitate movement for wildlife. <i>Planting hedges as a boundary treatment rather than fencing/walls can also be an effective way to deliver meaningful biodiversity gains in some cases.</i></p>	<p>Response from GWT advises that proposals should be encouraged to consider hedging as an alternative to fencing. This could be an effective way to delivering meaningful net gain in some cases.</p> <p>It is considered that the additional text is helpful for</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
				illustrating the types of measures which may help to deliver biodiversity net gain.
PM55	Para 8.36	<p>The features, habitats and species of importance to environmental quality, biodiversity and geological conservation considered in relation to points a) to c) of Policy NAT1 will include:</p> <ul style="list-style-type: none"> • Sites of Special Scientific Interest (SSSIs); • legally protected species; • Local Sites, including Local Wildlife Sites, Regionally Important Geological/geomorphological sites and any new Local Nature Reserves; • species or habitats of principal importance recognised in the Biodiversity Action Plan or listed under Section 41 of the Natural Environment and Rural Communities Act 2006 (priority habitats and species); • trees, woodlands, and hedgerows (where they are considered to be of sufficient value), ancient woodland (including semi-natural and replanted woodland), aged 	<p>1. The features, habitats and species of importance to environmental quality, biodiversity and geological conservation considered in relation to points a) to c) of Policy NAT1 will include:</p> <ul style="list-style-type: none"> • Sites of Special Scientific Interest (SSSIs); • legally protected species; • Local Sites, including Local Wildlife Sites, Regionally Important Geological/geomorphological sites and any new Local Nature Reserves; • species or habitats of principal importance recognised in the Biodiversity Action Plan or listed under Section 41 of the Natural Environment and Rural Communities Act 2006 (priority habitats and species) <i>and in any Post 2020 UK Biodiversity Framework;</i> • <i>Land forming part of locally defined ecological networks identified in Local Nature Recovery Strategies;</i> • trees, woodlands, and hedgerows (where they are considered to be of sufficient value), ancient woodland (including semi-natural and replanted woodland), aged and veteran trees and historic orchards; and 	<p>Response from GWT advises that this paragraph is not future-proofed in terms of policy and legislation and the BAP has been superseded. The Local Nature Recovery Strategy and reference to priority species listed under the post 2020 UK Biodiversity framework should be included because they will supersede the BAP within the time period covered by the Plan.</p> <p>Response from GWT to NAT1 policy wording advises that developments that result in the loss, deterioration or harm of important parts of local ecological networks should not be permitted, subject to the exceptions already listed. Furthermore, Bredon Parish Council, Kemerton Parish Council and Kemerton Conservation Trust highlight that nature is not bound by administrative boundaries and</p>

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		<p>and veteran trees and historic orchards; and</p> <ul style="list-style-type: none"> • ponds, where these make an important contribution to the quality of the environment and its biodiversity resource 	<ul style="list-style-type: none"> • ponds, where these make an important contribution to the quality of the environment and its biodiversity resource 	<p>the reasoned justification for NAT1 needs to make clear that the impact of development on sites beyond the borough boundary needs to be taken into account. 'Land forming part of locally defined ecological networks identified in Local Nature Recovery Strategies' has therefore been listed at para 8.36. These will include land across administrative boundaries. Policy NAT1 requires consideration of both direct and indirect impacts on features, habitats or species of importance to biodiversity.</p> <p>See commentary for para 8.49 for further justification for changes</p>
PM56	Para 8.39	<p>The internationally designated habitat sites in Tewkesbury Borough are the Cotswold Beechwoods Special Area of Conservation (SAC) in Brockworth and Great Witcombe parishes, and the Dixton Wood SAC in Alderton parish. Development that has potential to have a likely significant effect on these internationally designated sites (either alone or in combination with other plans and</p>	<p>The <i>European or</i> internationally designated habitat sites in Tewkesbury Borough are the Cotswold Beechwoods Special Area of Conservation (SAC) in Brockworth and Great Witcombe parishes, and the Dixton Wood SAC in Alderton parish. Development that has potential to have a likely significant effect on these <i>European or</i> internationally designated sites (either alone or in combination with other plans and projects) will be subject to a Habitats Regulations Assessment.</p>	<p>It is more accurate to refer to European designated sites as well as internationally designated.</p>

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		projects) will be subject to a Habitats Regulations Assessment.		
PM57	Para 8.46	<p>A number of the priority habitats within Tewkesbury Borough form part of Strategic Nature Areas on the Gloucestershire Nature Map produced by the Local Nature Partnership (Figure 1). These identify landscape-scale areas where there is opportunity for both the maintenance and, crucially, the restoration/expansion of Priority Habitat. The aim of Strategic Nature Areas is to highlight and thus provide the opportunity to link existing areas rich in wildlife and to improve a percentage of intervening land for biodiversity. In accordance with Policy SD9 of the JCS and the requirements of NAT1 the Borough Council will seek to secure improvements to Strategic Nature Areas through new development wherever possible and appropriate to do so. A strategically important ecological network for Gloucestershire is also being developed by the Local Nature Partnership and this will be likely to be heavily based on the Strategic Nature Areas, strategically important green infrastructure areas as well as main rivers and other watercourses. A Gloucestershire ecological network map will be produced which will show existing priority habitat and restoration zones through which habitat</p>	<p>A number of the <i>The</i> priority habitats within Tewkesbury Borough <i>represent local ecological networks which, together with protected sites, Local Nature Reserves and green/blue infrastructure, will form part of the Nature Recovery Network.</i> form part of Strategic Nature Areas on the Gloucestershire Nature Map produced by the Local Nature Partnership (Figure 1). These identify landscape-scale areas where there <i>are opportunities to create, restore or enhance habitats or improve connectivity.</i> there is opportunity for both the maintenance and, crucially, the restoration/expansion of Priority Habitat. The aim of Strategic Nature Areas is to highlight and thus provide the opportunity to link existing areas rich in wildlife and to improve a percentage of intervening land for biodiversity. In accordance with Policy SD9 of the JCS and the requirements of NAT1 the Borough Council will seek to secure <i>enhancements to local ecological networks though the opportunities provided by new development.</i> <i>For example, a number of the housing site allocations within this plan contain areas of priority habitat which could be restored and/or expanded as part of the development, in addition to improved habitat connectivity being provided with surrounding features. The enhancement of local ecological networks may also be the focus for the off-site delivery of biodiversity net gain where this is appropriate. Furthermore, the provision of on-site green/blue infrastructure and other ecological enhancements should seek to contribute to local ecological networks. In all cases enhancements</i></p>	<p>Gloucestershire Nature Map and Strategic nature areas will shortly be superseded by the Nature Recovery Network, in line with the approach of the Government's 25 Year Environment Plan and the upcoming Environment Act.</p> <p>The justification for landscape scale nature conservation and restoration should be based upon local ecological networks, such as the NRN Draft text for this has already been produced by GWT (on behalf of the GLNP) for the review of the Gloucester City Local Plan. Figure 1 should also be replaced to reflect this. Changes are required to reflect the most up to date position re. local ecological networks</p>

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		management, restoration or creation could improve connectivity.	<p>should be informed by Local Nature Recovery Strategies. improvements to Strategic Nature Areas through new development wherever possible and appropriate to do so. A strategically important ecological network for Gloucestershire is also being developed by the Local Nature Partnership and this will be likely to be heavily based on the Strategic Nature Areas, strategically important green infrastructure areas as well as main rivers and other watercourses. A Gloucestershire ecological network map will be produced which will show existing priority habitat and restoration zones through which habitat management, restoration or creation could improve connectivity.</p> <p><i>Figure 1 deleted</i></p>	
PM58	Para 8.49	This policy does not prevent the appropriate management of trees and woodlands or the removal of low value trees, hedgerows and other landscape features that do not make an important contribution to the quality of the local environment.	This policy does not <i>necessarily</i> prevent the appropriate management of trees and woodlands or the removal of low value trees, hedgerows and other landscape features that do not make an important contribution to the quality of the local environment. <i>However, whilst trees and hedgerows may not be considered to be of value from an aesthetic or arboricultural perspective, their removal should not be excluded from biodiversity net gain. The removal of trees/hedges of low value must still be offset under the net gain policy and any removal should take place outside of bird nesting season</i>	<p>Response from GWT advises that the removal of wooded features of low importance cannot be excluded from net gain. Removal of wooded features of low importance must still be offset under the net gain policy and should take place outside of bird nesting season.</p> <p>Changes are necessary to highlight the multifunctional nature of trees/hedges and ensure that they are also recognised for their ecological</p>

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				value. This also relates to changes made to para 8.36
PM59	Para 8.50	In some cases, the loss of trees and hedgerows may be unavoidable and outweighed by the benefits of the development. In such cases compensatory planting will be required on or near the site. Appropriate tree species should be selected and arrangements made for the long-term management of the new trees. Proposals involving new and replacement landscape features should also, where appropriate, have regard to the relevant landscape character types within the Gloucestershire Landscape Character Assessment and the Cotswolds AONB Landscape Character Assessment.	In some cases, the loss of trees and hedgerows may be unavoidable and outweighed by the benefits of the development. In such cases compensatory planting will be required on or near the site. Appropriate tree species should be selected and arrangements made for the long-term management of the new trees. Proposals involving new and replacement landscape features should also, where appropriate, have regard to the relevant landscape character types within the Gloucestershire Landscape Character Assessment and the Cotswolds AONB Landscape Character Assessment, <i>and be informed by local ecological networks and nature recovery strategies in order to avoid replacement planting in inappropriate habitats or species</i>	Response from GWT advises that compensatory planting should be informed by local ecological networks and nature recovery strategies to avoid replacement planting in inappropriate habitats or species. Changes have been made to highlight the importance of selecting appropriate species for ecological reasons in addition to landscape character.
PM60	Policy NAT3 - – Green Infrastructure: Building with Nature	Development must contribute, where appropriate to do so and at a scale commensurate to the proposal, towards the provision, protection and enhancement of the wider green infrastructure network. All proposals for green infrastructure will be expected to be designed in accordance with the 'Building with Nature' standards.	Development must contribute, where appropriate to do so and at a scale commensurate to the proposal, towards the provision, protection and enhancement of the wider green infrastructure network. All proposals for green infrastructure will be expected to be designed in accordance with the 'Building with Nature' standards. <i>All proposals for green infrastructure as part of major developments will be expected to be designed to a high quality and in accordance with established, recognisable</i>	PBA, on behalf of Linden Homes, argue that Building with Nature is a voluntary standard it should not be a requirement, and the policy should not place additional/onerous demands on developers that might render development undeliverable. This will ensure a justified and effective policy. In addition, the policy should address the Building with

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			<p><i>standards – including the National Design Guide and Building with Nature Standards.</i></p> <p>(Also see changes to paragraph 8.58)</p>	<p>Nature level that should be achieved (“Good” or “Excellent”).</p> <p>David Lock Associates on behalf of Hallam Land Management raise concern that the standards are not available on the Council’s website but rather an external website. As such, Hallam are of the view that this approach is not transparent nor is it clear how a development proposal would meet such requirements as the detail is not easily and readily available for developers.</p> <p>Changes have been made to reduce the burden on smaller developers and ensure such developments remain viable/deliverable. It is however reasonable and necessary to require major developments to deliver green infrastructure (GI) to a recognised standard. The National Design Guide (2019) recognises that good quality GI is a key component of good</p>

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				<p>design. The advice on achieving well designed places at Section 12 of the NPPF expects plans to set out clear design expectations so that applicants have as much certainty as possible about what is likely to be acceptable, and Local Planning Authorities to use tools and processes for assessing and improving the design of development. Building with Nature represents a tool for securing good quality GI and will help developers and the Council deliver well designed places, and achieve other NPPF objectives including enhancing the natural environment (Section 15) and promoting healthy communities (Section 8). However, to avoid a prescriptive approach and to guard against any future changes in guidance rendering the policy out of date, the wording has been changed to enable the use of alternative standards that will achieve the same goal of providing high quality GI</p>

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PM61	Para 8.56	JCS Policy INF3 provides the strategic guidance on what is expected from new development in regard to green infrastructure provision. All development should contribute towards the provision, improvement and maintenance of the green infrastructure network across the Borough where appropriate to do so. All development can potentially make a positive impact on the green infrastructure network and proposals will, where appropriate, be expected to make such provision at a scale that is commensurate with the development.	JCS Policy INF3 provides the strategic guidance on what is expected from new development in regard to green infrastructure provision. All development should contribute towards the provision, improvement and maintenance of the green infrastructure network across the Borough where appropriate to do so. <i>Whilst the Council will only expect 'major' development¹ proposals to be designed in accordance with established, recognised green infrastructure standards,</i> —All developments can <i>still</i> potentially make a positive impact on the green infrastructure network and proposals will, where appropriate, be expected to make such provision at a scale that is commensurate with the development.	Changes to clarify approach to non-major development
PM62	Paras 8.57 to 8.59	In 2017 a partnership between the Gloucestershire Wildlife Trust and the University of the West of England launched the 'Building with Nature' scheme. Building with Nature introduces a set of best practice standards for the development of green infrastructure, being together existing guidance to recognise the importance of high quality green infrastructure at all stages of	In 2017 a partnership between the Gloucestershire Wildlife Trust and the University of the West of England launched the 'Building with Nature' scheme. Building with Nature introduces a set of best practice standards for the development of green infrastructure, <i>beringing</i> together existing guidance to recognise the importance of high quality green infrastructure at all stages of the development process. The standards help to define what good green infrastructure <i>is</i> and set out the basic	Clarity is provided in relation to which standards the Council will expect developments to achieve to comply with Policy NAT3. A copy of the Building with Nature Standards has been added to the examination library within the 'Submitted evidence Base and supporting documents' section

¹ Major development is defined in the NPPF as (for housing development) where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m² or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
		<p>the development process. The standards help to define what good green infrastructure and set out the basic approach to providing it through new development.</p> <p>To achieve high quality infrastructure provision, and to ensure that best practice is followed, the Borough Council will expect developers to utilise these standards to inform development from the outset. Compliance and the design process should be demonstrated through Design and Access Statements and/or any site-based green infrastructure strategy.</p> <p>Developers are referred to the latest Building with Nature User Guide available on the Council's website https://www.tewkesbury.gov.uk/planning-policy-evidence-base</p>	<p>approach to providing it through new development. <i>The Building with Nature standards can be used as a tool for demonstrating the provision of high quality green infrastructure as part of new development in accordance with Policy NAT3. The National Design Guide (MHCLG, 2019) also provides a useful set of design principles in relation to green infrastructure. Whilst the 'Nature', 'Movement' and 'Public Spaces' characteristics are the more obvious provisions, the general design guidelines throughout the document are equally as important to landscape/green infrastructure design (for example understanding context and local character features, climate change adaptation and mitigation, and ongoing management and maintenance).</i></p> <p>To achieve high quality infrastructure provision, and to ensure that best practice is followed, the Borough Council will expect developers to utilise these relevant standards to inform development from the outset. Compliance and the design process should be demonstrated through Design and Access Statements and/or any site-based green infrastructure strategy.</p> <p>Developers are referred to the latest Building with Nature User Guide available on the Council's website https://www.tewkesbury.gov.uk/planning-policy-evidence-base</p> <p><i>A copy of the Building with Nature standards is provided at Appendix 6. There are twenty three standards in total:</i></p>	<p>(ref. EB027), and will be appended to the plan prior to adoption</p>

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			<p><i>five Core Standards and six standards in each of the themes (Water, Wellbeing and Wildlife). To represent high quality green infrastructure proposals should be consistent with all five of the Core standards and standards 1-3 from the Wellbeing, Water and Wildlife themes respectively. The National Design Guide is available to download at https://www.gov.uk/government/publications/national-design-guide.</i></p>	
PM63	Policy ENV1 Development near sewage treatment works		<p><i>All development adjacent to sewage treatment works must demonstrate by way of suitable mitigation how they will not cause unreasonable restrictions upon existing sewage treatment operations or their ability to achieve sustainable development in the future over the time horizon of the plan.</i></p>	Response from County Council Minerals & Waste Authority requested that the policy includes provision that new development does not unreasonably impact up on the operation of existing sewage treatment sites. Although covered by the Waste Core Strategy it is considered that the additional policy text would add clarity.
PM64	Policy ENV2 – Flood Risk and Water Management	<p>Proposals (including surface water drainage schemes) should be designed to appropriate, locally specific allowances for climate change for peak river flood flows and rainfall intensity;</p> <p>Opportunities to reduce the existing risk of flooding in the Borough will be sought,</p>	<p>Proposals (including surface water drainage schemes) should be designed to appropriate, locally specific allowances for climate change for peak river flood flows and rainfall intensity, <i>and undertake new hydraulic modelling where necessary;</i></p> <p>Opportunities to reduce the existing risk of flooding <i>from all sources</i> in the Borough will be sought, including, requiring developments to provide <i>contribute towards</i></p>	Response from the Environment Agency (EA) requests that policy is enhanced. An associated soundness objection is raised. EA consider that the policy appears to be very weighted towards surface water control rather than ensuring all forms

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		<p>including requiring developments to provide flood storage on sites located within the headwaters of the Borough's watercourses</p>	<p><i>the provision of additional</i> flood storage on sites located within the headwaters of the Borough's watercourses <i>or other techniques such as natural flood management and re-naturalisation of watercourses (link with Policy NAT2)</i></p> <p><i>New bullet points added to policy:</i></p> <ul style="list-style-type: none"> <i>• Opportunities to improve and maintain existing measures for providing an adequate warning system within the borough, through appropriate financial contributions, will be sought where any new development relies on such a service over its lifetime to allow safe access/egress for future residents</i> <i>• Foul water drainage from new development should, wherever possible, be managed via the mains sewer. Adequate infrastructure to accommodate this (both in terms of physical capacity and environmental capacity) must be available or capable of being made available in a timely manner.</i> <p><u><i>Reasoned justification (new para 8.67)</i></u></p> <p><i>To protect water quality and the water environment it is important that there is sufficient wastewater infrastructure capacity to accommodate new development. Where there are concerns arising from a planning application about the capacity of wastewater infrastructure, applicants will be requested to provide information about how the proposed development will be drained and wastewater dealt with. Priority should</i></p>	<p>of flooding are considered within the borough. EA also consider that the policy currently results in a missed potential opportunity to allow all Flood Risk Management Authorities to seek betterments for existing communities in conjunction with developers and the opportunities that new development may present. EA also request that policy makes it clear that climate change needs to be assessed by developers in line with the most up to date policy, guidance and data, including undertaking new modelling where necessary, for all allocations where this has not already taken place in the SFRA. Additional/amended wording suggested by EA has been incorporated into policy. Furthermore, comments from the EA consider there to be a gap in the wastewater infrastructure evidence base and as such consider the Plan should include policy wording to make clear that foul water</p>

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			<p><i>always be given to the management of foul drainage via the public sewer and public sewage treatment works. Applications for developments relying on anything other than connection to a public sewage treatment plant will need to be supported by sufficient information to understand the potential implications for the water environment. The Council will consider the phasing of development where this is necessary to allow time for infrastructure improvements to be carried out.</i></p>	<p>drainage should wherever possible be via the mains sewer and that adequate infrastructure to accommodate this (both in terms of physical capacity and environmental capacity) will be provided in a timely manner. A soundness objection is raised in connection with this. Policy ENV2 has been modified to address these comments.</p>
PM65	Para 8.74 (Policy ENV2 – Flood Risk and Water Management)	Sustainable drainage systems can offer multifunctional benefits including improved water quality and habitat creation along with health and wellbeing and amenity benefits through their integration with green infrastructure.	<p><i>Well designed sustainable drainage systems can offer multifunctional benefits including improved water quality, and habitat creation and climate change mitigation, along with health and wellbeing and amenity benefits through their integration with green infrastructure. In this regard, other policies in this plan are closely linked to flood and water management, such as RES5 New Housing Development, EMP5 New Employment Development, NAT3 Green Infrastructure: Building with Nature and HEA1 Healthy & Active Communities. It is considered that multifunctional sustainable drainage systems are synonymous with good design. Indeed, the National Design Guide (2019) recognises the importance of multifunctional ‘green’ sustainable drainage systems for achieving well-designed places (paragraph 96). The integration of sustainable drainage systems with green infrastructure and street networks is of particular importance for achieving multifunctional benefits. For example bioretention tree pits, roadside swales, rain gardens and</i></p>	<p>Comments from Gloucestershire County Council stated that there was a good opportunity to provide cross-references to other plan policies which are linked to the multifunctional benefits of sustainable drainage systems.</p> <p>Responses from RPS on behalf of PE Duncliffe Ltd and Richborough Estates Ltd object to the 6th bullet point of policy (requirement for sustainable drainage systems to be designed to achieve multifunctional benefits and the prioritisation of green/soft solutions and the integration of sustainable drainage</p>

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			<i>permeable paving manage surface water close to source whilst providing attractive street scenes, improving water quality and creating a habitat for wildlife. Conversely, traditional piped systems and underground storage (i.e. tanks or crates) provide very few benefits other than surface water attenuation. It is considered that almost every site can incorporate a sustainable drainage system providing some multifunctional benefits. For example, even the most constrained, space limited brownfield site can potentially offer a range of solutions including green roofs, permeable surfacing and rainwater harvesting, thus delivering biodiversity, water quality and water conservation benefits.</i>	<p>systems with green infrastructure and street networks) on the basis that it is too prescriptive, does not reflect the requirements of national policy and is not clear as to its justification. Argued that policy as drafted is not soundly-based.</p> <p>No changes to policy wording but changes to reasoned justification have been made to better explain justification for this part of the policy.</p>
PM66	Policy ENV3 Solar Farms	Enable the conservation or enhancement of habitats and biodiversity features within the site and its surroundings.	Enable the conservation or <i>and</i> enhancement of habitats and biodiversity features within the site and its surroundings, <i>including local ecological networks identified in Local Nature Recovery Strategies</i> .	Response from Gloucestershire Wildlife Trust raises concern that policy does not protect 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. Changes have therefore been made to address this requirement
PM67	Policy HEA1 Healthy & Active Communities	As a minimum, all major development will be required to demonstrate that the potential impacts on health have been considered and addressed through a Design and Access	As a minimum, all major development will be required to demonstrate that the potential impacts on health <i>and wellbeing</i> have been considered and addressed through a Design and Access Statement to a level proportionate to the scale of the development.	Addition of 'wellbeing' to this sentence for completeness, as per reference in following sentence of the policy and supporting text.

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
		Statement to a level proportionate to the scale of the development.		
PM68	Para 9.7 (Policy HEA1 Healthy & Active Communities)	Early engagement with the Director of Public Health, local Clinical Commission Groups and NHS England is encouraged.	Early engagement with the Director of Public Health, local Clinical Commissioning Groups and NHS England is encouraged.	Typographical error.
PM69	Para 9.16 (Policy RCN2 New Sports and Recreational Facilities)	Floodlighting can be a nuisance to adjacent land users and can cause an unnecessary glow in the night sky visible for some distance. A proposal for such lighting must demonstrate how essential it is for the particular project and must be of a design to minimise environmental impact e.g. the orientation of high intensity lighting for golf driving ranges away from homes and roads.	Floodlighting can be a <i>significant cause of light pollution</i> nuisance to adjacent land users and can cause an unnecessary glow in the night sky visible for some distance. <i>Any</i> proposal for such lighting must demonstrate how essential it is for the particular project and must be of a design to minimise environmental impact, <i>and must not have a significant adverse impact on local ecological networks</i> e.g. the use of LED lights; the orientation of high intensity lighting for golf driving ranges away from <i>ecological habitats/networks</i> , homes and roads. <i>In some circumstances, lighting may be required to implement automatic switch-off timing mechanism and/or not be operated at certain times of year due to local ecological circumstances.</i>	Comments from Sport England requested reference to the potential need for lighting controls on flood light facilities. Gloucestershire Wildlife Trust requested that reference be made for the need for floodlighting to not impact on local ecological networks.
PM70	Para 9.21 (Policy RCN4 Equine Facilities)		In addition, regard should be had to the requirements of policy NAT1 and the need to ensure that equine development does not result in the degradation of priority habitats or designated biodiversity sites.	Gloucestershire Wildlife Trust requested that reference be made for the need for equine development not to degrade priority habitats or designated biodiversity sites.
PM71a	Para 10.3	The policies in the Joint Core Strategy support the Local Transport Plan with requirements for developers to provide safe and accessible travel choices, avoiding or	The policies in the Joint Core Strategy support the Local Transport Plan with requirements for developers to provide safe and accessible travel choices, avoiding or mitigating severe predicted increases in congestion,	Highways England representations stated the need for clarification that both JCS and TBP policies are

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
		mitigating severe predicted increases in congestion, providing the necessary highway infrastructure, walking, cycling and public transport options and preparing Transport Statements, Assessments and Travel Plans where significant amounts of new trips are anticipated.	<p>providing the necessary highway infrastructure, walking, cycling and public transport options and preparing Transport Statements, Assessments and Travel Plans where significant amounts of new trips are anticipated.</p> <p><i>These policies are equally applicable to all scales of growth within the Borough including that specifically set out within this Borough Plan.</i></p> <p><i>In addition, as the strategic plan, the JCS is supported by a comprehensive transport evidence base that provides a strategy for the cumulative total growth required during the plan period, including what is to be delivered through the Borough Plan. This includes the mitigation that is needed to deliver the total amount of growth in the area. Therefore, all development, including that proposed in this plan, needs to support the Transport Strategy underpinning the JCS.</i></p>	applicable to all scales of development and that new development should support the transport strategy underpinning the JCS.
PM71	Policy TRAC2 – Cycle Network & Infrastructure	Promoting and providing safe, well-lit cycle parking, storage and changing facilities at public transport nodes, schools, community facilities, and employment centres; and requiring new development to provide cycle facilities on site where appropriate.	Promoting and providing safe, well-lit cycle parking, storage, and changing facilities <i>and e-bike charging infrastructure</i> at public transport nodes, schools, community facilities, and employment centres; and requiring new development to provide cycle facilities on site where appropriate.	Gloucestershire County Council noted the opportunity to expand this policy to include provision for e-bike infrastructure.
PM72	Policy TRAC3 Bus Infrastructure	On strategic-scale developments, including JCS Strategic Allocations, the potential for bus services to move through the site should be explored and, where possible and operationally viable, required to enable a sustainable service to be established or routed. The design of such developments should enable the safe, direct and convenient	On strategic-scale developments, including JCS Strategic Allocations, the potential for bus services to move through the site should be explored and, where possible and operationally viable, <i>developments will be</i> required to enable a sustainable service to be established or routed. The design of such developments should enable the safe, direct and convenient movement of buses including appropriate passenger facilities.	Sentence did not make sense and required amendment for clarity.

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
		movement of buses including appropriate passenger facilities.		
PM73	Para 10.25 (Policy TRAC5 Ashchurch for Tewkesbury Rail Station)	The station would also benefit from improved accessibility and Tewkesbury Borough Council will seek to improve links to the station from the surrounding area, particularly Tewkesbury Town.	The station would also benefit from improved accessibility and Tewkesbury Borough Council will seek to improve links to the station from the surrounding area, <i>such as the wider area, particularly Tewkesbury Town, particularly by sustainable transport modes.</i>	Comment by Worcestershire County Council that there should be particular focus on sustainable transport links to the station.

Policies Map Changes

PM74	Policies Map Winchcombe	Conservation area boundary for Winchcombe town is incorrect.	Conservation area boundary to be identified as per the adopted Winchcombe & Sudeley Neighbourhood Plan.	Previous version of the conservation area boundary was identified in error – incorrect GIS file. Corrected to show the actual latest boundary.
PM75	Policies Map TEW4 – Healings Mill	The boundary of the site includes part of the Severn Ham SSSI.	Boundary of the TEW4 site to be amended to exclude part of the SSSI area from the site.	A parcel of land within the SSSI and owned by Tewkesbury Town Council was included in the site boundary in error – as raised in comments by Natural England and Tewkesbury Town Council.
PM76	Policies Map Bishops Cleeve settlement boundary		Settlement boundary of Bishops Cleeve to be extended to cover the residential area now granted planning permission (18/00249/OUT) on Stoke Road.	The proposed allocation to extend Malvern View Business Park has now received planning permission for 215 dwellings and 2.24ha of employment land (18/00249/OUT). Therefore the residential development boundary of the settlement needs to be amended to reflect this.

PM77	Policies Map EMP1 – Malvern View Business Park		Boundary of the business park to be amended to reflect the employment area now granted planning permission (18/00249/OUT) on Stoke Road.	The proposed allocation to extend Malvern View Business Park has now received planning permission for 215 dwellings and 2.24ha of employment land (18/00249/OUT). Therefore the employment site allocation has been amended to reflect this.
PM78	Policies Map – Twigworth		Settlement boundary for Twigworth, established through the made Down Hatherley, Norton & Twigworth NDP, to be included on the Borough Plan policies maps.	The settlement boundary was omitted from the Borough Plan maps in error.