

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

To accompany the submission of the Tewkesbury Borough Plan the Borough Council prepared a schedule of changes that could be made to the Pre-Submission (October 2019) version of the Plan. This was submitted as CD011A.

This was in accordance with the Planning Practice Guidance (PPG) (Paragraph: 054 Reference ID: 61-054-20190315) which 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.

The Borough Council is proposing a number of further changes to the Pre-Submission (October 2019) version of the plan to address issues identified through the examination process, including through Statements of Common Ground and at the examination hearings.

The changes presented in this schedule consist of amendments that the Borough Council would like the Inspector to consider through the examination process and may result in main modifications to the plan if the Inspector is minded to do so. All main modifications will be subject to consultation.

NOTE

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

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, alongside the growth that has already occurred, and while the Joint Core Strategy identifies where large strategic development will take place to accommodate some of this growth, it is the role of the Tewkesbury Borough Plan to identify where additional smaller-scale development should take place. In order to do this we need to decide the best way to accommodate the new housing and jobs necessary to meet our needs, while at the same time considering how to protect key assets – like our valuable countryside, our historic environment and our open spaces. This draft plan identifies preferred sites, known as ‘allocations’, to accommodate development and sets out policies to manage development and protect our key assets.	It is forecast that over the next 14 years Tewkesbury borough will experience significant growth, alongside the growth that has already occurred, and while the Joint Core Strategy identifies where large strategic development will take place to accommodate some of this growth, it is the role of the Tewkesbury Borough Plan to identify where additional smaller-scale development should take place. In order to do this we need to decide the best way to accommodate the new housing and jobs necessary to meet our needs, while at the same time considering how to protect key assets – like our valuable countryside, our historic environment and our open spaces. This draft plan identifies preferred sites, known as ‘allocations’, to accommodate development and sets out policies to manage development and protect our key assets. <u>This plan should be read as a whole, together with the other documents forming the Development Plan, including the Joint Core Strategy and any Neighbourhood Development Plans.</u>	<p>*Incorporates further proposed modifications post submission*</p> <p>Amendment to reflect the JCS plan period remaining.</p> <p><i>(The above referenced modification was submitted at same time as the plan as part of CD011a).</i></p> <p>Additional text added to confirm that the plan should be read as a whole</p>
PM02	Para 2.15 (Introduction)	Policies need to be up-to-date to be effective in guiding planning decisions. The currently adopted Tewkesbury Borough Local Plan covered the period 1991-2011. While most of these policies have been ‘saved’ (i.e. they are still legally capable of being used in decision making) they need to be replaced by a new plan that reflects changes in local and national circumstances. Tewkesbury Borough Council therefore wants to ensure that the borough is covered by a development plan so that local planning decisions can be based on a locally considered plan	Policies need to be up-to-date to be effective in guiding planning decisions. The currently adopted Tewkesbury Borough Local Plan covered the period 1991-2011. While most of these policies have been ‘saved’ (i.e. they are still legally capable of being used in decision making) they need to be replaced by a new plan that reflects changes in local and national circumstances. Tewkesbury Borough Council therefore wants to ensure that the borough is covered by a development plan so that local planning decisions can be based on a locally considered plan rather than solely on the application of national policy on	<p>*Further proposed modification post submission*</p> <p>Added to ensure the Plan meets the legal requirements, and to ensure the Development Plan is read as whole.</p>

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		rather than solely on the application of national policy on an application by application basis.	an application by application basis. <u>The Policies in this Plan will therefore replace all the saved policies in the 2006 Tewkesbury Borough Local Plan. Further, the policies in the Plan must be read as a whole and in conjunction with the strategic policies set out within the Joint Core Strategy.</u>	
PM03A	New para 2.23		<u>Climate change is happening now; it is the issue of our times that cannot be ignored. The UK government has set a legal requirement to reduce greenhouse gas emissions by at least 100% of 1990 levels (net zero) by 2050. The Tewkesbury Borough Council has recently declared a climate change emergency and the local plan process is a key mechanism and catalyst for action on the ground. There needs to be a rapid step change in the way we live our lives and undertake our day to day activities in order to prevent the climate changing in such a way that it threatens the planet and future generations.</u>	<p>*Further proposed modifications post submission*</p> <p>Response from the Environment Agency objects to the plan as they consider that it does not do enough to address the climate emergency and the need to achieve carbon neutrality. Change required to address Environment Agency objection - as agreed in SOCG17</p>
PM03B	New para 2.24		<u>Climate change today is already resulting in a shift in our seasons: hotter drier summers, warmer wetter winters, more frequent droughts, more storms and gales resulting in damage to property. This is creating loss in wildlife habitats and species, social unrest through increased migration, greater demand for cooling in offices and homes, greater strain on water resources and wildlife, worsening summer air pollution, greater risk of flooding, increased heat stress to the elderly and infirm. These effects are happening globally and here in Tewkesbury Borough. The risk of flooding in</u>	

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			<p><u>Tewkesbury and neighbouring areas is already high and these risks are increasing steadily.</u></p>	
PM03C	New para 2.25		<p><u>In order to address the climate emergency and in demonstrating compliance with Policy SD3 of the Adopted Joint Core Strategy, applicants will be expected to demonstrate the use of best available techniques to adapt and mitigate to the effects of climate change. It is expected these would not lead to excessive costs that undermine development viability. Policies for new development in this Plan therefore include a clause which provides: Proposals for new buildings shall adopt best available techniques not entailing excessive costs (BATNEEC) to adapt to and mitigate the effects of climate change.</u></p>	
PM03D	New para 2.26		<p><u>This clause helps to ensure that the effects of climate change can be mitigated and adapted to without causing unnecessary costs that may affect the viability of any development scheme. Examples of BATNEEC include elements of design, layout and location, in accordance with JCS Policy SD3 whereby for example housing is sited to maximise solar gain in the winter with shading in the summer; use of sustainable materials in construction; low-flow water systems and the implementation of sustainable urban drainage systems; measures to mitigate against the risks of flooding which is prevalent throughout the Tewkesbury borough and is outlined in the councils SPD Flood and Water Management; and enabling of car share schemes. In addition, renewables are becoming increasingly affordable and the technology in this area is</u></p>	

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			<u>changing all the time; opportunities therefore exist to exploit this area in sustainable design and construction without excessive costs.</u>	
PM03E	New para 2.27		<u>Policies SD3: Sustainable Design and Construction, SD4: Design Requirements, INF2: Flood Risk Management, and INF3: Green Infrastructure of the JCS also provide climate change requirements.</u>	
PM03F	New para 2.28		<u>This policy clause also links to the recently published Gloucestershire Energy Strategy 2019¹ This strategy sets out nine key building blocks. The fifth is: Developing Stronger Planning Policies. These policies should “...enable more local renewables and require zero-carbon and smart enabled new developments. To meet long-term targets, new planning policies need (a) to ensure that all new developments contribute to reducing carbon emissions rather than increasing them and are resilient to climate change and; (b) to enable the growth of renewable energy generation and smart energy infrastructure, taking appropriate account of landscape sensitivities.’</u>	
PM03G	New para 2.29		<u>Including this policy clause enables real progress to be made in climate change mitigation and adaptation. This will help bring about environmental and socio-economic improvements that will benefit Tewkesbury and its communities.</u>	

¹ <https://www.gfirstlep.com/downloads/2019/gloucestershire-energy-strategy-2019.pdf>

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PM04	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 <u>education, training</u> , health (physical and mental), homes, recreation, cultural and religious needs.	Suggestion received from Gloucestershire County Council (Public Health) to include reference to education and training within the vision.
PM05	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 <u>social</u> 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.
PM06	Para 3.5 (Introduction to Housing Section)	To achieve these objectives this plan sets out the Council's preferred policy approach for enabling appropriate small-scale housing development at those settlements not defined within the settlement hierarchy. A specific site allocation is also made at Forthampton to meet community aspirations to enable a small amount of new housing within the settlement to support its vitality.	To achieve these objectives this plan sets out the Council's preferred policy approach for enabling appropriate small-scale housing development at those settlements not defined within the settlement hierarchy. A specific site allocation is also made at Forthampton to meet community aspirations to enable a small amount of new housing within the settlement to support its vitality.	*Further proposed modification post submission* Site FOR1 to be deleted from plan. Site was added at a time when there was community support for the development of a Neighbourhood Plan and enabling some small-scale housing growth in village. The impetus for both has now dwindled and therefore the allocation would no longer be consistent with JCS Policy SP2s Spatial Hierarchy and SD10 (Residential Development). For this reason and in light of issues

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				<p>raised by Historic England the allocation can no longer be justified. A main modification is therefore proposed to remove this from the Plan. It is not counted in the overall housing figures, so these will not be affected.</p>												
PM07	Para 3.7 (Introduction to Housing Section)	<table border="1"> <thead> <tr> <th colspan="2" data-bbox="472 585 965 624">Urban fringe settlements</th> </tr> </thead> <tbody> <tr> <td data-bbox="472 624 712 927">Gloucester</td> <td data-bbox="712 624 965 927"> Brockworth Churchdown Hucclecote Innsworth Longford </td> </tr> <tr> <td data-bbox="472 927 712 1018">Cheltenham</td> <td data-bbox="712 927 965 1018">Uckington</td> </tr> </tbody> </table>	Urban fringe settlements		Gloucester	Brockworth Churchdown Hucclecote Innsworth Longford	Cheltenham	Uckington	<table border="1"> <thead> <tr> <th colspan="2" data-bbox="1131 585 1736 624">Urban fringe settlements</th> </tr> </thead> <tbody> <tr> <td data-bbox="1131 624 1370 927">Gloucester</td> <td data-bbox="1370 624 1736 927"> Brockworth Churchdown Hucclecote Innsworth Longford </td> </tr> <tr> <td data-bbox="1131 927 1370 1358">Cheltenham</td> <td data-bbox="1370 927 1736 1358"> <u>Farm Lane/Leckhampton Lane (Shurdington Parish)</u> <u>Grovefield Way/Cold Pool Lane (Badgeworth Parish)</u> <u>Cockroft Lane/Mill Lane (Southam Parish)</u> </td> </tr> </tbody> </table>	Urban fringe settlements		Gloucester	Brockworth Churchdown Hucclecote Innsworth Longford	Cheltenham	<u>Farm Lane/Leckhampton Lane (Shurdington Parish)</u> <u>Grovefield Way/Cold Pool Lane (Badgeworth Parish)</u> <u>Cockroft Lane/Mill Lane (Southam Parish)</u>	<p>*Further proposed modification post submission*</p> <p>Following discussion at the Examination Hearings, further consideration was given to, and now put forward for additional settlements being included on the basis that these areas (to be defined on policies map) involve existing or emerging built up areas on the periphery of Gloucester or Cheltenham but within Tewkesbury Borough</p>
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PM08A	Policy RES1 – Housing Site Allocations (Site GOT1)	<p data-bbox="472 357 815 379"><u>Table 1 –Housing Site Allocations</u></p> <table border="1" data-bbox="472 411 965 943"> <tr> <td data-bbox="472 411 562 692">GOT1</td> <td data-bbox="562 411 685 692">Land to the north of Malles-on Road, Gotherington (GNDP 2/1)</td> <td data-bbox="685 411 768 692">0.86 ha</td> <td data-bbox="768 411 896 692">6 dwellings</td> <td data-bbox="896 411 965 692">No</td> </tr> <tr> <td data-bbox="472 692 562 943">FOR1</td> <td data-bbox="562 692 685 943">Land at corner of Bishops Walk and School Lane, Forthampton</td> <td data-bbox="685 692 768 943">1.55 ha</td> <td data-bbox="768 692 896 943">10 dwellings</td> <td data-bbox="896 692 965 943">Yes</td> </tr> </table>	GOT1	Land to the north of Malles-on Road, Gotherington (GNDP 2/1)	0.86 ha	6 dwellings	No	FOR1	Land at corner of Bishops Walk and School Lane, Forthampton	1.55 ha	10 dwellings	Yes	<p data-bbox="1131 357 1473 379"><u>Table 1 –Housing Site Allocations</u></p> <table border="1" data-bbox="1131 411 1711 911"> <tr> <td data-bbox="1131 411 1220 660">GOT1</td> <td data-bbox="1220 411 1364 660">Land to the north of Malles-on Road, Gotherington (GNDP 2/1)</td> <td data-bbox="1364 411 1464 660">0.86 ha</td> <td data-bbox="1464 411 1619 660"><u>9 dwellings</u></td> <td data-bbox="1619 411 1711 660">No</td> </tr> <tr> <td data-bbox="1131 660 1220 911">FOR1</td> <td data-bbox="1220 660 1364 911">Land at corner of Bishops Walk and School Lane, Forthampton</td> <td data-bbox="1364 660 1464 911">1.55ha</td> <td data-bbox="1464 660 1619 911">10 dwellings</td> <td data-bbox="1619 660 1711 911">Yes</td> </tr> </table>	GOT1	Land to the north of Malles-on Road, Gotherington (GNDP 2/1)	0.86 ha	<u>9 dwellings</u>	No	FOR1	Land at corner of Bishops Walk and School Lane, Forthampton	1.55ha	10 dwellings	Yes	<p data-bbox="1832 357 2063 453">*Further proposed modification post submission*</p> <p data-bbox="1832 501 2152 954">GOT1 has now received planning permission for 9 dwellings (Application ref. 19/00476/FUL). The suggested modification is necessary in order to regularise the position in respect of the site capacity and ensure consistency between the PSTBP and the pending planning application – as agreed in SOCC9</p> <p data-bbox="1832 1002 2145 1369">Site FOR1 to be deleted from plan. Site was added at a time when there was community support for the development of a Neighbourhood Plan and enabling some small-scale housing growth in village. The impetus for both has now dwindled and therefore the allocation</p>
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				would no longer be consistent with JCS Policy SP2s Spatial Hierarchy and SD10 (Residential Development). For this reason and in light of issues raised by Historic England the allocation can no longer be justified. A main modification is therefore proposed to remove this from the Plan. It is not counted in the overall housing figures, so these will not be affected.
PM08B	Policy RES1 – Housing Site Allocations	Table 1 – Housing Site Allocations	Housing site allocations TEW2, BIS1, GOT1, GOT2 and MAI1 are to be removed from RES1 as they have received planning permission as of April 2020.	*Further proposed modification post submission* Requested by the Inspector as a result of discussions during the Hearings.
PM09	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 and take into account	Response from the Environment Agency (EA) requests alterations to the policy to address flood risk

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			<u>appropriate, locally specific allowances for climate change.</u>	
PM10	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 <u>and take into account appropriate, locally specific allowances for climate change.</u>	*Further proposed modification post submission* The boundary of the Registered Battlefield does not extend into the site and the reference to it within Policy TEW1 should be omitted – as agreed in SOCG8
PM11	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 Local 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.
PM12	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) Deliver a biodiversity net gain, which may include the expansion/restoration of the habitats associated with the Severn Ham SSSI	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), <u>and be designed to be flood 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.</u>	Response from the Environment Agency (EA) requests alterations to the policy to address flood risk.

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			<p><u>address the site specific FRA requirements set out within the Level 2 Strategic Flood Risk Assessment (November 2017).</u></p> <p>Deliver a biodiversity net gain, <u>including</u> 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.
PM13	Policy BIS2 - Land at Homelands Farm, Bishops Cleeve		<u>Proposals should address the site specific FRA requirements set out within the Level 2 Strategic Flood Risk Assessment (November 2017).</u>	Added to for consistency and in response to comments received from the EA
PM14A	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 (Cleevelands) and providing biodiversity net gains</p>	<p>All built development must be located in Flood Zone 1 and <u>take 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).</u></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 (Cleevelands) and providing biodiversity net gains <u>focusing on ecological enhancements to the Dean Brook.</u></p>	Response from the Environment Agency (EA) requests improvements to policy in relation to flood risk/ecology
PM14B	Policy BIS3 – Land at allotments off	Vehicle access should be from the adjacent development to the south/west (Cleevelands) unless demonstrated not to be feasible	Vehicle access should be from the adjacent development to the south/west (Cleevelands) unless demonstrated not to be feasible	*Further proposed modification post submission*

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	A435, Bishops Cleeve			Agreed with site promoter (Cotswold Homes & Diocese of Gloucester) in order to reflect comments received from Gloucestershire County Council Highways Authority in response to the pending planning application for the site – as agreed in SOCG7
PM15A	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 <u>this</u> 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
PM15B	Policy WIN1 - Land off Delavale Road/Orchard Road, Winchcombe	The proposal should promote accessibility to local services and public transport by pedestrians and cyclists by ensuring permeability through the site and connectivity with adjacent streets	<u>Proximity of pedestrian and cycling access from the site to the town centre is a critically important development principle that is pertinent to this site and should therefore be secured by the proposal. Additionally,</u> t The proposal should promote accessibility to local services and public transport by pedestrians and cyclists by ensuring permeability through the site and connectivity with adjacent streets. <u>Opportunities to provide a pedestrian and cycle access to the south-east of the site, connecting the wider development with Orchard Road, should be explored, and implemented, unless demonstrated not to be feasible or viable.</u>	*Further proposed modification post submission* Change required in order to secure an identified opportunity for an additional pedestrian/cycle access point into the wider allocation which would enhance its sustainability by providing a more direct and convenient access to bus stops and the services and facilities within

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				Winchcombe Town Centre - to reflect proposed wording in SOCG 20 and further modified policy wording provided to the Inspector as a result of discussions during the Hearings.
PM16A	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 <u>COO2</u> (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.

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PM16B	Policy COO1 - Land at junction of A38/A4019, Coombe Hill	<p>The development of this site presents a place making opportunity. The Council will expect....</p> <ul style="list-style-type: none"> the proposal to contribute to the wider green infrastructure network, deliver biodiversity net gains and mitigate against increased recreational pressures on the Coombe Hill Canal Site of Special Scientific Interest 	<p>The development of this site presents a place making opportunity. The Council will expect....</p> <ul style="list-style-type: none"> the proposal to contribute to the wider green infrastructure network, deliver biodiversity net gains and mitigate against increased recreational pressures on the Coombe Hill Canal Site of Special Scientific Interest, <u>including by providing alternative natural greenspace on site.</u> <p><u>In order to limit increased recreational pressure on the Coombe Hill Canal Site of Special Scientific Interest (and surrounding land functionally linked with the Severn Estuary Special Protection Area), and to enable the provision of mitigation in the form of an alternative natural greenspace on site, it is expected that the quantum of development on site shall not significantly exceed the indicative capacity of 50 dwellings. Development proposals will be subject to Habitats Regulations Assessment.</u></p>	<p>*Further proposed modification post submission*</p> <p>Change required to address Gloucestershire Wildlife Trust (GWT) objection and concerns raised by Natural England (NE) - as agreed in SOCG5 (GWT) and SOCG19 (NE)</p>
PM17	Policy SHU1 - Land at corner of Badgeworth Lane and A46, Shurdington	<p>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.</p>	<p>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.</p>	<p>Policy caveat is not necessary as site SHU4 was not included in the Pre-Submission plan and reference was left in error.</p>
PM18	Policy SHU2 – Land north of Leckhampton Lane, Shurdington		<p><u>Proposals should address the site specific FRA requirements set out within the Level 2 Strategic Flood Risk Assessment (November 2017)</u></p>	<p>Added to for consistency and in response to comments received from the EA</p>

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PM19A	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.		<p>*Further proposed modification post submission*</p> <p>Site FOR1 to be deleted from plan (see PM06). Should however the Inspector disagree with this proposal, it is recommended that the modification to Policy FOR1 set out at PM19B is provided.</p>
PM19B	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. <u>Proposals should have regard to the design guidance within the Forthampton Conservation Area Character Statement (Tewkesbury Borough Council, 2004).</u>	Change was 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 been produced and added to the evidence base supporting the plan.
PM19C	Para 3.18 (Policy RES1)	In addition to the allocations at Tewkesbury town, the Rural Service Centres and Service Villages in accordance with Policy SP2, one site allocation is located at Forthampton whereby there are	In addition to the allocations at Tewkesbury town, the Rural Service Centres and Service Villages in accordance with Policy SP2, one site allocation is located at Forthampton whereby there are community aspirations	*Further proposed modification post submission*

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
		<p>community aspirations to enable a small amount of new housing within the settlement to support its vitality. The site allocation featured at Policy RES1 has been put forward by a local landowner with the support of the Parish Council. Whilst allocating land for housing at Forthampton does not feature as part of the JCS spatial strategy set out at Policy SP2, in accordance with Policy SP10 there can be other specific exceptions/circumstances in the district plans where housing will be permitted. In this instance the site at Forthampton is a locally driven proposal which, in the spirit of the Localism Act, is considered to be appropriate in principle. The site is however located within a sensitive context within the setting of the Conservation Area and numerous Listed Buildings. Forthampton also has a strong rural character with a low density, sporadic development set within open countryside, part of which lies within the Landscape Protection Zone. It is essential therefore that proposals on this site are sympathetic to the character of the settlement and its setting. Further information on the Council's approach to this matter is set out within the Housing Background Paper. Furthermore, Policy RES1 allocates two sites at Brockworth (BRO1 and BRO2). At the time of writing these sites both had a resolution to grant planning permission for residential development and are therefore suitable for allocation in this plan.</p>	<p>to enable a small amount of new housing within the settlement to support its vitality. The site allocation featured at Policy RES1 has been put forward by a local landowner with the support of the Parish Council. Whilst allocating land for housing at Forthampton does not feature as part of the JCS spatial strategy set out at Policy SP2, in accordance with Policy SP10 there can be other specific exceptions/circumstances in the district plans where housing will be permitted. In this instance the site at Forthampton is a locally driven proposal which, in the spirit of the Localism Act, is considered to be appropriate in principle. The site is however located within a sensitive context within the setting of the Conservation Area and numerous Listed Buildings. Forthampton also has a strong rural character with a low density, sporadic development set within open countryside, part of which lies within the Landscape Protection Zone. It is essential therefore that proposals on this site are sympathetic to the character of the settlement and its setting. Further information on the Council's approach to this matter is set out within the Housing Background Paper. Furthermore, Policy RES1 allocates two sites at Brockworth (BRO1 and BRO2). At the time of writing these sites both had a resolution to grant planning permission for residential development and are therefore suitable for allocation in this plan.</p>	<p>To reflect deletion of Site FOR1 from plan</p>
PM19D	Para 3.19 (Policy RES1)	<p>The sites listed above would provide up to 1115 dwellings in total. It should however be noted that 66 of these dwellings are on sites that already benefit</p>	<p>The sites listed above would provide up to 1115 dwellings in total. It should however be noted that 66 of these dwellings are on sites that already benefit from planning</p>	<p>*Further proposed modification post submission*</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
		<p>from planning permission. This leaves a remaining uncommitted supply (i.e. sites that don't already have planning permission) of 1,049 dwellings. Of these uncommitted sites, 200 dwellings would be located at the Rural Service Centres and 267 dwellings at the Service Villages. This would produce a total supply (plan period commitments plus proposed allocations) of 2109 new dwellings at the Rural Service Centres and 1060 new dwellings at the Service Villages. Further to this the proposed allocations would produce up to 300 (uncommitted) new dwellings at Tewkesbury Town, 272 new dwellings at Brockworth and 10 new dwellings at Forthampton. The plan also identifies a potential windfall housing opportunity at the MAFF site through Policy RET9 (Tewkesbury Town Regeneration). This would deliver approximately 40 additional dwellings at Tewkesbury town over and above the allocated supply identified in this plan.</p>	<p>permission. This leaves a remaining uncommitted supply (i.e. sites that don't already have planning permission) of 1,049 dwellings. Of these uncommitted sites, 200 dwellings would be located at the Rural Service Centres and 267 dwellings at the Service Villages. This would produce a total supply (plan period commitments plus proposed allocations) of 2109 new dwellings at the Rural Service Centres and 1060 new dwellings at the Service Villages. Further to this the proposed allocations would produce up to 300 (uncommitted) new dwellings at Tewkesbury Town, and 272 new dwellings at Brockworth. and 10 new dwellings at Forthampton. The plan also identifies a potential windfall housing opportunity at the MAFF site through Policy RET9 (Tewkesbury Town Regeneration). This would deliver approximately 40 additional dwellings at Tewkesbury town over and above the allocated supply identified in this plan.</p>	<p>To reflect deletion of Site FOR1 from plan</p>
PM20	New para 3.23 (Policy RES1)		<p><u>The trajectory below shows the plan period housing trajectory position for Tewkesbury Borough, with the inclusion of the housing site allocations provided by Policy RES1. This shows that housing delivery is expected to exceed the cumulative requirements up until 2029/30. Housing delivery would be in deficit against cumulative requirements for the final two years of the plan period and would lead to an overall plan period shortfall of 530 dwellings to be met via strategic allocations in the JCS Review.</u></p>	<p>*Further proposed modification post submission*</p> <p>To provide an updated position in respect of plan period supply and delivery as proposed in the Council's Matter 2 Statement – paragraph 2.2.6</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification							Reason	
			Year	Completions & Commitments	Milton Delivery	Borough Plan Delivery	Total and Projected Completions	Cumulative Completions	Plan - Annual Housing Requirement		Plan - Cumulative Housing Requirement
			2011-12	319			319	319	495	495	-176
			2012-13	463			463	782	495	990	-208
			2013-14	517			517	1299	495	1485	-186
			2014-15	567			567	1866	495	1980	-114
			2015-16	630			630	2496	495	2475	21
			2016-17	730			730	3226	495	2970	256
			2017-18	933			933	4159	495	3465	694
			2018-19	981			981	5140	495	3960	1180
			2019-20	439			439	5579	495	4455	1124
			2020-21	612			612	6191	495	4950	1241
			2021-22	121			165	286	495	5445	1032
			2022-23	176			310	486	495	5940	1023
			2023-24	198	25		311	534	495	6435	1062
			2024-25	196	50		71	317	495	6930	884
			2025-26	196	100		25	321	495	7425	710
			2026-27	186	100		50	336	495	7920	551
			2027-28	146	100		40	286	495	8415	342
			2028-29	146	125		25	296	495	8910	143
			2029-30	146			25	171	495	9405	-181
			2030-31	146			0	146	495	9900	-530
PM21A	Policy RES3 New Housing Outside Settlement Boundaries	<p>Policy RES3 New Housing Outside Settlement Boundaries</p> <p>Outside of the defined settlement boundaries (identified on the Policies Map) the principle of new residential development will be considered acceptable where development being proposed consists of:</p> <ol style="list-style-type: none"> The reuse of a redundant or disused permanent building (subject to Policy RES7) The sub-division of an existing dwelling into two or more self-contained residential units (subject to Policy RES8) Very small scale development at rural settlements in accordance with Policy RES4 A replacement dwelling (subject to Policy RES9) 									<p>*Further proposed modification post submission*</p> <p>Policies RES3 and RES4 are to be reordered following discussions at the Hearings. Policy RES4 will now become RES3, and RES3 will become RES4. All references to these policies will be changed accordingly throughout the Plan.</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
		<p>5. A rural exception site for affordable housing (subject to Policy RES6)</p> <p>6. Dwellings essential for rural workers to live permanently at or near their place of work in the countryside (subject to Policy AGR3)</p> <p>7. A site that has been allocated through the Development Plan or involves development through local initiatives including Community Right to Build Orders and Neighbourhood Development Orders.</p>		
PM21B	Para 3.27 (Policy RES3)	<p>Within the rural areas (i.e. those parts of the Borough located outside of defined settlement boundaries) a restrictive approach is required to new residential development consistent with the advice at paragraph 79 of the NPPF and Policy SD10 of the JCS, and so to not undermine the JCS spatial strategy and its distribution of development. Policy RES3 sets out the Council's approach to new residential development within the rural areas and should be read alongside the advice within the NPPF. Policy RES3 is however supplemented by a number of criteria based policies (RES4-RES9) to ensure resulting developments are either not isolated or present special circumstances in accordance with the advice on rural housing within the NPPF.</p>		<p>*Further proposed modification post submission*</p> <p>Policies RES3 and RES4 are to be reordered following discussions at the hearings. Policy RES4 will now become RES3, and RES3 will become RES4. All references to these policies will be changed accordingly throughout the Plan.</p>
PM22A	Policy RES4 New housing at other rural settlements	<p>Policy RES4 New housing at other rural settlements</p> <p>To support the vitality of rural communities and the continued availability of services and facilities in the</p>	<p>Policy RES34 New housing at other rural settlements</p> <p>To support the vitality of rural communities and the continued availability of services and facilities in the rural</p>	<p>*Incorporates further proposed modifications post submission*</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
	(To now be RES3)	<p>rural areas, very small-scale residential development will be acceptable in principle within and adjacent to the built up area of other rural settlements (i.e. those not featured within the settlement hierarchy) providing:</p> <ul style="list-style-type: none"> a) it is of a scale that is proportionate to the size and function of the settlement and maintains or enhances sustainable patterns of development; b) 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; c) it complements the form of the settlement and is well related to existing buildings within the settlement; d) the site of the proposed development is not of significant amenity value or makes a significant contribution to the character and setting of the settlement in its undeveloped state; e) the proposal would not result in the coalescence of settlements f) the site is not located in the Green Belt, unless the proposal would involve limited infilling in a village, limited affordable housing for local community needs (in accordance with Policy RES6) or any other 	<p>areas, very small-scale residential development will be acceptable in principle within and adjacent to the built up area of other rural settlements (i.e. those not featured within the settlement hierarchy) providing:</p> <ul style="list-style-type: none"> g) it is of a scale that is proportionate to the size and function of the settlement and maintains or enhances sustainable patterns of development; h) 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 <u>during the plan period</u>, whichever is lesser, will be allowed; i) it complements the form of the settlement and is well related to existing buildings within the settlement; j) the site of the proposed development is not of significant amenity value or makes a significant contribution to the character and setting of the settlement in its undeveloped state; k) the proposal would not result in the coalescence of settlements l) the site is not located in the Green Belt, unless the proposal would involve limited infilling in a village, limited affordable housing for local community needs (in accordance with Policy RES6) or any other exceptions explicitly stated within the National Planning Policy Framework. <p>In all cases development must comply with the relevant criteria set out at Policy RES5. Particular attention will be</p>	<p>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)</p> <p>(The above referenced modification was submitted at same time as the plan as part of CD011a).</p> <p>Policies RES3 and RES4 are to be reordered following</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
		<p>exceptions explicitly stated within the National Planning Policy Framework.</p> <p>In all cases development must comply with the relevant criteria set out at Policy RES5. Particular attention will be given to the effect of the development on the form, character and landscape setting of the settlement.</p>	<p>given to the effect of the development on the form, character and landscape setting of the settlement.</p>	<p>discussions at the hearings. Policy RES4 will now become RES3, and RES3 will become RES4</p>
PM22B	<p>Para 3.29 (Policy RES4) (now RES3)</p>	<p>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 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>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 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 <u>(based on the number of existing dwellings in the settlement)</u> or 10 dwellings <u>during the plan period</u>, whichever is lesser, will be allowed at these rural settlements. This will be measured from <u>the existing number of dwellings within the built up area of the settlement</u> as it the settlement</p>	<p>*Incorporates further proposed modifications post submission*</p> <p>As above</p> <p>Policy RES4 (now RES3) only allows very small-scale residential development within and adjacent to the built up area of other rural settlements. Further text added to clarify that the existing number of dwellings within the built up area of the settlement will be used as the baseline for measuring the 5% growth or 10 dwelling restriction within RES4.</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
			<p>existed at the start of the plan period. <u>The term built up area for the purpose of this policy is defined at paragraph 3.32.</u></p>	
PM23A	<p>Policy RES4 New Housing Outside Settlement Boundaries (formerly RES3)</p>		<p><u>Policy RES4 New Housing Outside Settlement Boundaries</u></p> <p><u>Outside of the defined settlement boundaries (identified on the Policies Map) the principle of new residential development will be considered acceptable where development being proposed consists of:</u></p> <ol style="list-style-type: none"> 1. <u>The reuse of a redundant or disused permanent building (subject to Policy RES7)</u> 2. <u>The sub-division of an existing dwelling into two or more self-contained residential units (subject to Policy RES8)</u> 3. <u>Very small scale development at rural settlements in accordance with Policy RES4</u> 4. <u>A replacement dwelling (subject to Policy RES9)</u> 5. <u>A rural exception site for affordable housing (subject to Policy RES6)</u> 6. <u>Dwellings essential for rural workers to live permanently at or near their place of work in the countryside (subject to Policy AGR3)</u> 7. <u>A site that has been allocated through the Development Plan or involves development through local initiatives including Community Right to Build Orders and Neighbourhood Development Orders.</u> 	<p>*Further proposed modification post submission*</p> <p>Policies RES3 and RES4 are to be reordered following discussions at the hearings. Policy RES4 will now become RES3, and RES3 will become RES4</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
PM23B	New para below Policy RES4 New Housing Outside Settlement Boundaries (formerly para 3.27)		<p><u>Within the rural areas (i.e. those parts of the Borough located outside of defined settlement boundaries) a restrictive approach is required to new residential development consistent with the advice at paragraph 79 of the NPPF and Policy SD10 of the JCS, and so to not undermine the JCS spatial strategy and its distribution of development. Policy RES3 sets out the Council's approach to new residential development within the rural areas and should be read alongside the advice within the NPPF. Policy RES3 is however supplemented by a number of criteria based policies (RES4-RES9) to ensure resulting developments are either not isolated or present special circumstances in accordance with the advice on rural housing within the NPPF.</u></p>	<p>*Further proposed modification post submission*</p> <p>Policies RES3 and RES4 are to be reordered following discussions at the hearings. Policy RES4 will now become RES3, and RES3 will become RES4</p>
PM24A	Policy RES5 New Housing Development	In considering proposals for new housing development regard will be had to the following principles, as appropriate. Proposals should:	<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"> • <u>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</u> 	<p>Response from County Council Minerals & Waste Authority requested that an additional policy point is added to caveats in RES5.</p> <p>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 for adequate waste management.</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
PM24B	Policy RES5 New Housing Development (new bullet point)		<ul style="list-style-type: none"> • <u>Shall adopt best available techniques not entailing excessive costs (BATNEEC) to adapt to and mitigate the effects of climate change.</u> 	<p>*Further proposed modification post submission* Change required to address Environment Agency objection - SOCG17 See PM03</p>
PM25	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 <u>the letting of</u> 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

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
				than its ongoing occupation.
PM26A	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 and disused buildings in the rural areas (the areas located outside of defined settlement boundaries) for residential use will be permitted provided that: 5. <u>The proposal can mitigate the impact on any protected species that may be caused by the conversion or reuse.</u>	<p>*Incorporates further proposed modifications post submission*</p> <p>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 to cover this issue would add clarity. (The above referenced modification was submitted at same time as the plan as part of CD011a).</p> <p>The word 'disused' has been added to align wording of policy with its related policy RES4 (New housing outside of settlement boundaries).</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
				RES4 was formerly RES3 at the time of submission but is proposed to change the ordering as set out at PM21-23 above as discussed and agreed in the Hearing Sessions.
PM26B	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, <u>redundant, or disused</u> 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. <u>The Council may request evidence to demonstrate that the building proposed to be converted is redundant or disused in situations where this is unclear from the information provided with the application and from observations on site.</u>	* Incorporates further proposed modifications post submission* As agreed in the Hearing Discussions changes made to reinforce that policy applies to redundant or disused buildings and making it clear that evidence may be required to demonstrate this.
PM27A	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: 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: 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, <u>and</u>	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-

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
			<p>4. <u>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.</u></p>	<p>use change would not have a significant impact on local ecological networks or deliver a net loss of priority habitat.</p> <p>Changes have also been made to the reasoned justification to the policy (Para 3.59)</p>
PM27B	Para 3.59 (Policy RES11)	<p>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.</p>	<p>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 <u>and the</u> future introduction of features such as sheds, areas of hardstanding, drying areas or garages. <u>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.</u> 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.</p>	As above

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
PM28	Policy RES12 Affordable housing	<p>Where there is an issue relating to the viability of development that impacts on delivery of the full affordable housing requirement, developers should consider:</p> <p>i. Varying the housing mix and design of the scheme in order to reduce costs whilst having regard to the requirements of other policies in the plan and the objective of creating a balanced housing market;</p>	<p>Where there is an issue relating to the viability of development that impacts on delivery of the full affordable housing requirement, developers should consider:</p> <p>i. Varying the housing mix, <u>tenure mix</u> and design of the scheme in order to reduce costs whilst having regard to the requirements of other policies in the plan and the objective of creating a balanced housing market;</p>	Response from FODDC suggest that there is a need to consider also varying the tenure mix to aid viability
PM29	Para 3.61	<p>The NPPF sets out that, in Designated Rural Areas (which are defined as National Parks, Areas of Outstanding Natural Beauty and areas designated as ‘rural’ under section 157(1) of the Housing Act 1985), local planning authorities may choose to apply a lower threshold of 5 units or less. Within Tewkesbury Borough the areas within the AONB are a Designated Rural Area. Applications for new housing within the AONB will therefore be subject to the lower threshold described above and will be required to provide 40% affordable housing on schemes of 6 – 9 dwellings, which should be delivered on site. . Schemes involving 10 or more units (or sites of 0.5ha or more) will be required to provide 40% affordable housing on site regardless of their location.</p>	<p>The NPPF sets out that, in Designated Rural Areas (which are defined as National Parks, Areas of Outstanding Natural Beauty and areas designated as ‘rural’ under section 157(1) of the Housing Act 1985), local planning authorities may choose to apply a lower threshold of 5 units or less. Within Tewkesbury Borough the areas within the AONB are a Designated Rural Area. Applications for new housing within the AONB will therefore be subject to the lower threshold described above and will be required to provide 40% affordable housing on schemes of 6 – 9 dwellings, which should be delivered on site. . Schemes involving 10 or more units (or sites of 0.5ha or more) will be required to provide 40% affordable housing on site regardless of their location. <u>The affordable housing tenure mix to be provided will be assessed having regard to up-to-date evidence of local needs and in line with the definition set out in Annex 2 of the NPPF.</u></p>	<p>*Further proposed modification post submission*</p> <p>Following a query raised at the hearings, this modification clarifies that affordable housing provision may include discounted market sales housing (DMSH) where appropriate. DMSH was added to the definition set out in the Glossary to the NPPF in July 2018.</p>

Ref.	Plan Ref.	Pre-Submission Text				Modification				Reason
PM30	Policy GTTS1: Site allocations for Gypsies and Travellers	Site Allocations		Site area (hectares)	Capacity (Pitches)	Site Allocations		Site area (hectares)	Capacity (Pitches)	<p>*Further proposed modification post submission*</p> <p>It has been confirmed by the site owner that the allocation at the Leigh (Land adjacent to Fieldview) for 8 pitches is no longer suitable or available, given the planning permission for the change of use to extend the existing garage operations on that site. It is therefore proposed to withdraw this allocation. See EXAM027</p>
		Minsterworth	Land adjacent to Hygrove Place, Hygrove Lane	0.40	7	Minsterworth	Land adjacent to Hygrove Place, Hygrove Lane	0.40	7	
		Staver-ton	Hillview, Bamfurlong Lane	0.89	15	Staver-ton	Hillview, Bamfurlong Lane	0.89	15	
		The Leigh	Land adjacent to Fieldview, A38	0.37	8	The Leigh	Land adjacent to Fieldview, A38	0.37	8	
PM31	Para 3.81	At the time of writing, there had been 20 pitches granted permission since April 2016. This leaves a requirement for a further 58 pitches. The allocations presented in this plan would provide for a further 30 pitches. This means that there would still be a shortfall of 28 pitches against the total needs regardless of the PPTS definition. However, no further site options were deemed to be available, suitable and achievable to deliver additional pitches.				At the time of writing, there had been 20 pitches granted permission since April 2016. This leaves a requirement for a further 58 pitches. The allocations presented in this plan would provide for a further 30 <u>22</u> pitches. This means that there would still be a shortfall of 36 <u>28</u> pitches against the total needs regardless of the PPTS definition. However, no further site options were deemed to be available, suitable and achievable to deliver additional pitches. Nevertheless, existing commitments and the				Amendment to take account of deletion of the Land adjacent to Fieldview, A38.

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
		<p>Nevertheless, existing commitments and the allocations in the Borough Plan would provide for a total of 50 pitches. This means that the pitch targets for 'travelling households' (5 pitches) plus the majority of the pitch targets for 'unknown' households (48 pitches) would have been met. As only a proportion of the 'unknown' households are likely to meet the PPTS definition, then the PPTS requirement to identify a supply of sites against pitch targets for gypsies and travellers (as defined by the PPTS) has been satisfied.</p>	<p>allocations in the Borough Plan would provide for a total of 4250 pitches. This means that the pitch targets for 'travelling households' (5 pitches) plus the majority of the pitch targets for 'unknown' households (48 pitches) would have been met. As only a proportion of the 'unknown' households are likely to meet the PPTS definition, then the PPTS requirement to identify a supply of sites against pitch targets for gypsies and travellers (as defined by the PPTS) has been satisfied.</p>	
		<p>Only one suitable site has been identified, for nine plots, and is allocated in this plan. No other suitable sites have been put forward to the Assessment of Land Availability for Travelling Showpeople's Yards. In order to meet the remaining target for plots the criteria set out at JCS Policy SD14 will be used to assess future proposals, as well as to safeguard existing sites from changes to alternative uses.</p>	<p>Only one suitable site <u>was</u> identified, for nine plots, and <u>has now been granted planning permission</u>. No other suitable sites have been <u>were</u> put forward to the Assessment of Land Availability for Travelling Showpeople's Yards. In order to meet the remaining target for plots the criteria set out at JCS Policy SD14 will be used to assess future proposals, as well as to safeguard existing sites from changes to alternative uses.</p>	<p>Amendment to take account of granting of planning permission of allocated site.</p>
PM32	Policy EMP1 Major Employment Sites	<p>At Major Employment Sites, as defined on the Policies Map, the Borough Council will support in principle proposals for B-class employment development. It is expected that new development at these sites will normally be for B-class uses only.</p> <p>Proposals for limited non-B-class development may be supported where they constitute ancillary and complementary services that promote the overall viability of the employment site.</p>	<p>At Major Employment Sites, as defined on the Policies Map, the Borough Council will support in principle proposals for B-class employment development <u>within Use Classes B and E(g)</u>. It is expected that new development at these sites will normally be for B-class <u>and E(g) class</u> uses only.</p> <p>Proposals for limited non-B-class development <u>not falling within Use Classes B and E(g)</u> may be supported where</p>	<p>*Incorporates further proposed modifications post submission*</p> <p>Proposed allocation at Malvern Business Park has now received planning permission for 215 dwellings and 2.24ha of employment land (18/00249/OUT). Therefore, the</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason																																				
		<p>Proposals for the expansion of Major Employment Sites may be considered where they satisfy the criteria at Policy EMP5.</p> <p>The following sites are allocated as Major Employment Sites:</p> <table border="1"> <thead> <tr> <th>Location</th> <th>Site</th> <th>TBP Extension (Ha)</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Bishops Cleeve</td> <td>Cleeve Business Park</td> <td>-</td> </tr> <tr> <td>Malvern View Business Park</td> <td>15.9ha</td> </tr> <tr> <td>Brockworth</td> <td>Gloucester Business Park</td> <td>-</td> </tr> <tr> <td rowspan="2">Churchdown/Staverton</td> <td>Staverton Technology Park</td> <td>-</td> </tr> <tr> <td>Meteor Business Park</td> <td>1.3ha</td> </tr> </tbody> </table>	Location	Site	TBP Extension (Ha)	Bishops Cleeve	Cleeve Business Park	-	Malvern View Business Park	15.9ha	Brockworth	Gloucester Business Park	-	Churchdown/Staverton	Staverton Technology Park	-	Meteor Business Park	1.3ha	<p>they constitute ancillary and complementary services that promote the overall viability of the employment site.</p> <p>Proposals for the expansion of Major Employment Sites may be considered where they satisfy the criteria at Policy EMP5.</p> <p>The following sites are allocated as Major Employment Sites:</p> <table border="1"> <thead> <tr> <th>Location</th> <th>Site</th> <th>TBP Extension (Ha)</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Bishops Cleeve</td> <td>Cleeve Business Park</td> <td>-</td> </tr> <tr> <td>Malvern View Business Park</td> <td>15.9ha <u>2.24ha</u></td> </tr> <tr> <td>Brockworth</td> <td>Gloucester Business Park</td> <td>-</td> </tr> <tr> <td rowspan="4">Churchdown/Staverton</td> <td>Staverton Technology Park</td> <td>-</td> </tr> <tr> <td>Meteor Business Park</td> <td>1.3ha</td> </tr> <tr> <td>Ashville Business Park</td> <td>3.9ha</td> </tr> <tr> <td>Bamfurlong Industrial Park</td> <td>4.2ha</td> </tr> </tbody> </table>	Location	Site	TBP Extension (Ha)	Bishops Cleeve	Cleeve Business Park	-	Malvern View Business Park	15.9ha <u>2.24ha</u>	Brockworth	Gloucester Business Park	-	Churchdown/Staverton	Staverton Technology Park	-	Meteor Business Park	1.3ha	Ashville Business Park	3.9ha	Bamfurlong Industrial Park	4.2ha	<p>employment site allocation has been amended to reflect this.</p> <p>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 – as set out in SOCG1</p> <p>(The above referenced modifications were submitted at same time as the plan as part of CD011a).</p> <p>Please note that TBC determined a hybrid</p>
Location	Site	TBP Extension (Ha)																																						
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			Ashville Business Park	3.9ha		Gloucestershire Airport	8.5ha	<p>planning application (ref. 20/00758/FUL) for a new business park development on 15th March 2021 whereby it granted:</p> <ol style="list-style-type: none"> 1. Full permission for the provision of a new site access off the B4063, internal estate roads and associated infrastructure; 2. Outline permission for a mixed use development comprising of Class B1(c), B2 and B8 employment use on 5.9 hectares of land. <p>These permissions relate to the full extent of the proposed expansion land at Bamfurlong Industrial Park and some 1.7ha of the further (8.5ha) land promoted by Gloucestershire Airport as set out above</p>
	Bamfurlong Industrial Park	4.2ha	Innsworth	Innsworth Technology Park	-			
Innsworth	Innsworth Technology Park	-	Tewkesbury	Tewkesbury Business Park	-			
Tewkesbury	Tewkesbury Business Park	-		Ashchurch Business Park	-			
	Ashchurch Business Park	-						

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
				Further modifications (post submission) are to reflect changes to Use Classes Order 1 st September 2020 - as set out in EXAM002A
PM33	Para 4.6 (Policy EMP1 Major Employment Sites)	The major employment sites present some of the largest and most important employment areas in the borough. This policy seeks to encourage sustainable development of these sites and retain them as prime locations for economic growth. The primary scope of identifying these sites is to encourage traditional B-class development for which there is a great demand for land. Therefore, the council will normally expect new development at these sites to be for B-class uses.	The major employment sites present some of the largest and most important employment areas in the borough. This policy seeks to encourage sustainable development of these sites and retain them as prime locations for economic growth. The primary scope of identifying these sites is to encourage traditional B-class <u>forms of employment</u> development for which there is a great demand for land, <u>and in order to help achieve the need for a minimum of 192ha of B-class employment land* across the JCS area in accordance with policies SP1 and SP2 of the JCS.</u> Therefore, the council will normally expect new development at these sites to be for B-class uses <u>and uses within Class E(g) of the Town and Country Planning (Use Classes) Order 1987 (as amended). The Council will impose conditions on planning permissions for new premises in Classes B and E(g) in order to secure the premises within those uses in perpetuity and require express planning permission for their change of use to alternative uses. This is necessary in order to ensure that the employment sites remain focused on supporting jobs and delivering the JCS requirement for employment land. It also recognises that Major Employment Sites are</u>	*Further proposed modifications post submission* To reflect changes to Use Classes Order 1 st September 2020 - as set out in EXAM002A . Additional changes made to make it clear that the Council will seek to impose conditions on planning permissions in order to secure B-class and E(g) class uses on the major employment sites and control subsequent changes of use to alternative (non-conforming) uses that would otherwise not need planning permission. This is required in order to safeguard the major employment sites for

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
			<p><u>located at out-of-centre locations where the development of new main town centre uses and other types of development normally found in central areas would not be appropriate as they could potentially harm the vitality and viability of the Borough's designated retail centres. Applications for the removal or variation of such conditions will be considered against Policy EMP6 of this plan (Safeguarding of Employment Sites) and specific policies relating to the new uses that could result from the removal/variation of condition(s), including RES3, RES5 and RET4 (as appropriate).</u></p> <p>(footnotes) * The JCS was adopted prior to the use class changes that came into effect on 1st September 2020. The need for B-class employment land in the JCS area is now considered to include Class E(g) (in place of B1) in addition to the retained classes B2 and B8.</p>	<p>employment uses and to prevent a proliferation of alternative non-employment uses that would harm the Council's ability to help meet the objectively assessed need for employment land in the JCS area and would potentially harm to vitality and viability of the Borough's designated retail centres.</p>
PM34	Para 4.7 (Policy EMP1 Major Employment Sites)	Proposals for non-B-class uses will therefore not normally be supported at Major 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.	Proposals for non-B-class uses <u>not falling within Use Classes B and E(g)</u> will therefore not normally be supported at Major Employment Sites. However, some limited non B-class <u>B and E(g) class</u> 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	<p>*Incorporates further proposed modifications post submission*</p> <p>Response from County Council Minerals & Waste Authority requested that the potential for waste infrastructure to be</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
			<p>nurseries, gyms, food outlets, can often help to promote the vitality of employment areas. <u>Furthermore, some employment generating infrastructure operations, such as waste and water management facilities can also be appropriate.</u> Beyond this, other proposals for larger non- B-class uses <u>not falling within Use Classes B and E(g)</u> may only be considered in exceptional circumstances. Such proposals would need to demonstrate that there would be a positive economic impact that outweighs the loss of land for B-class <u>B and E(g) class</u> uses and that it would not be to the detriment of the wider economic growth of the site and the wider area. Proposals would be required to demonstrate that the proposed use would be job-generating and that the viability of the Major Employment Site for B-class <u>B and E(g) class</u> uses would not be compromised.</p>	<p>suitable on employment sites.</p> <p>While Policy EMP1 does not restrict this, it is considered that additional wording in the reasoned justification could help clarify this (<u>modification submitted at same time as the plan as part of CD011a</u>).</p> <p>Further modifications (post submission) are to reflect changes to Use Classes Order 1st September 2020</p> <p>TBC has considered whether to define more specifically the types of uses that would be appropriate at each of the major employment sites. However, as the EMP1 sites are allocated in order to help achieve the need for a minimum of 192ha of 'B-class' employment land (to now include E(g)) across the JCS area in accordance with policies</p>

Ref.	Plan Ref.	Pre-Submission Text			Modification			Reason
								SP1 and SP2 of the JCS, TBC considers that these sites should focus on these uses only. Any alternative (non B and E(g) class) uses permitted at these sites would be an exception to the normal application of the policy.
PM35	Para 4.11 (Policy EMP1 Major Employment Sites)	Proposals for the expansion of existing Major Employment Sites to provide additional B-class employment land may be considered in order to promote economic growth and the vitality and viability of the employment area.			Proposals for the expansion of existing Major Employment Sites to provide additional B-class <u>and E(g) class</u> employment land may be considered in order to promote economic growth and the vitality and viability of the employment area.			<p>*Further proposed modification post submission*</p> <p>To reflect changes to Use Classes Order 1st September 2020 - as set out in EXAM002A.</p>
PM36	Policy EMP2 Rural Business Centres	At Rural Business Centres, as defined on the Policies Map, the Borough Council will support in principle proposals for B-class employment development.			At Rural Business Centres, as defined on the Policies Map, the Borough Council will support in principle proposals for B-class employment development <u>within Use Classes B and E(g)</u> .			<p>*Further proposed modification post submission*</p> <p>To reflect changes to Use Classes Order 1st September 2020 - as set out in EXAM002A.</p>
PM37 ^A	Policy EMP2 – site allocations table.	Location	Site	TBP Extension (Ha)	Location	Site	TBP Extension (Ha)	Error in location of Highfield Farm. Site is

Ref.	Plan Ref.	Pre-Submission Text			Modification			Reason
		Deerhurst	Highfield Farm	2.7ha	Deerhurst <u>Elmstone Hardwicke</u>	Highfield Farm	2.7ha	located in the parish of Elmstone Hardwicke.
PM37A	<u>Policy EMP2 – site allocations table.</u>	<u>Location</u>	<u>Site</u>	<u>TBP Extension (Ha)</u>	<u>Location</u>	<u>Site</u>	<u>TBP Extension (Ha)</u>	*Further proposed modification post submission* <u>To reflect that Withytrees Farm is a new allocation. Site areas were previously only shown for extensions proposed to sites previously allocated in the Local Plan to 2011.</u>
		<u>Winchcombe</u>	<u>Withytrees Farm</u>	=	<u>Winchcombe</u>	<u>Withytrees Farm</u>	<u>1</u>	
PM38	Para 4.15 (Policy EMP2 Rural Business Centres)	Given the small scale and rural location of the Rural Business Centres, proposals for alternative non- B Class job generating or complementary uses are unlikely to be supported. 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. However any such uses must be small-scale and not detract from the overall B-class nature of the rural business centre.			Given the small scale and rural location of the Rural Business Centres, proposals for alternative non-B Class job generating or complementary uses <u>not falling within Use Classes B and E(g)</u> are unlikely to be supported. Some limited non-B-class uses <u>not falling within Use Classes B and E(g)</u> may be supported where they provide ancillary and complementary services that would supplement the operation of the employment area. However, any such uses must be small-scale and not detract from the overall B <u>class and E(g)</u> class nature of the rural business centre. <u>In order to help achieve the identified need for employment land across the JCS area in accordance with policies SP1 and SP2 of the JCS, the Council will impose conditions on planning permissions</u>			*Further proposed modification post submission* To reflect changes to Use Classes Order 1 st September 2020 - as set out in <u>EXAM002A</u> . Additional changes made to make it clear that the Council will seek to impose conditions on planning permissions in order to secure B-class and E(g) class uses at the Rural Business Centres and

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
			<p><u>for new premises in Classes B and E(g) in order to secure the premises within those uses in perpetuity and require express planning permission for their change of use to alternative uses, including retail related uses within Class E and to residential use that would otherwise be permitted by the Town and Country Planning (General Permitted Development) Order (as amended). This is necessary in order to ensure that the employment sites remain focused on supporting jobs and delivering the JCS requirement for employment land. It also recognises that the Rural Business Centres are located at out-of-centre locations where the development of new main town centre uses and other types of development normally found in central areas would not be appropriate as they could, for example, potentially harm the vitality and viability of the Borough's designated retail centres. Moreover, the majority of the Rural Business Centres are located outside of defined settlement boundaries and in locations that would not be sustainable for new housing. Proposals for new residential development at the Rural Business Centres would only be permitted in accordance with Policy RES4 (subject to certain exceptions). Applications for the removal or variation of such conditions will be considered against Policy EMP6 of this plan (Safeguarding of Employment Sites) and specific policies relating to the new uses that could result from the removal/variation of condition(s), including RES4, RES5 and RET4 (as appropriate).</u></p>	<p>control subsequent changes of use to alternative (non-conforming) uses that would otherwise not need planning permission - for the reasons set out at PM33 (EMP1), and also due to the fact that the majority of the Rural Business Centres are located outside of defined settlement boundaries where the principle of residential development is not normally acceptable. Although Policy RES3 does allow for the reuse of a redundant or disused permanent building on sites located outside of settlement boundaries (subject to Policy RES7), TBC does not consider that the 3 month vacancy test at Class MA of the GPDO is sufficient enough to demonstrate that a building is truly redundant or disused</p>

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				<p>TBC has considered whether to define more specifically the types of uses that would be appropriate at each of the major employment sites. However, as the EMP2 sites are allocated in order to help achieve the need for a minimum of 192ha of 'B-class' employment land (to now include E(g)) across the JCS area in accordance with policies SP1 and SP2 of the JCS, TBC considers that these sites should focus on these uses only. Any alternative (non B and E(g) class) uses permitted at these sites would be an exception to the normal application of the policy.</p>
PM39	Para 4.16 (Policy EMP2 Rural Business Centres)	Proposals for the expansion of existing Rural Business Centres to provide additional B-class employment land may be considered in order to promote economic growth and the vitality and viability of the employment area.	Proposals for the expansion of existing Rural Business Centres to provide additional B-class <u>and E(g) class</u> employment land may be considered in order to promote economic growth and the vitality and viability of the employment area.	<p>*Further proposed modification post submission*</p> <p>To reflect changes to Use Classes Order 1st</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
				September 2020 - as set out in EXAM002A .
PM40	Para 4.18 (Policy EMP3 Employment sites within settlement boundaries	Policy EMP5 is intended to prevent incompatible forms of employment development within settlements.	Policy EMP5 is intended to prevent incompatible forms of employment development within settlements. <u>The term 'employment use(s)' for the purpose of this policy is defined as uses falling within Use Classes B and E(g) the Town and Country Planning (Use Classes) Order 1987 (as amended). The Council may consider imposing conditions on planning permissions for new premises in Classes B and E(g) in order to secure the premises within those uses in perpetuity and require express planning permission for their change of use to alternative uses. This may, for example, be necessary where subsequent changes of use that would otherwise not require planning permission would result in the provision of main town centre uses in out of centre locations that would for example, potentially harm the vitality and viability of the Borough's designated retail centres. Applications for the removal or variation of such conditions will be considered against Policy EMP6 of this plan (Safeguarding of Employment Sites) and specific policies relating to the new uses that could result from the removal/variation of condition(s), including RET4.</u>	<p>*Further proposed modification post submission*</p> <p>To reflect changes to Use Classes Order 1st September 2020 - as set out in EXAM002A.</p> <p>Whilst sites within settlement boundaries may be suitable for a variety of the alternative uses that could take place without the need for planning permission (i.e. residential), there is potential for some of these to result in the provision of new main town centre uses in out of centre locations that would otherwise be required to pass the sequential test and impact assessment (subject to 2500sqm threshold in NPPF) so to ensure they do not harm the vitality and viability of</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
				<p>the Borough's designated retail centres. The Council may therefore wish to restrict the ability of new premises to change use through conditions.</p>
PM41	<p>New para beneath 4.24 (Policy EMP4 Rural Employment Development)</p>		<p><u>With the exception of agricultural development, the term 'employment development' within this policy refers to uses falling within Use Classes B and E(g) the Town and Country Planning (Use Classes) Order 1987 (as amended). The Council will consider imposing conditions on planning permissions for new premises in Classes B and E(g) in order to secure the premises within those uses in perpetuity and require express planning permission for their change of use to alternative uses, including retail related uses within Class E and to residential use that would otherwise be permitted by the Town and Country Planning (General Permitted Development) Order (as amended). This is necessary as proposals for rural employment development will, by default, be located at out-of-centre locations where subsequent changes of use to new main town centre uses would not be appropriate as they could for example, potentially harm the vitality and viability of the Borough's designated retail centres. Moreover, proposals under this policy will normally be in locations that would not be sustainable for new residential development and where such proposals would normally be resisted in accordance with Policy</u></p>	<p>*Further proposed modification post submission*</p> <p>To reflect changes to Use Classes Order 1st September 2020 - as set out in EXAM002A.</p> <p>Additional changes made to make it clear that the Council will seek to impose conditions on planning permissions in order to secure B-class and E(g) class uses and control subsequent changes of use to alternative (non-conforming) uses that would otherwise not need planning permission. Proposals under this policy are by default located in out of centre locations and outside of defined</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
			<p><u>RES4. Applications for the removal or variation of such conditions will be considered against Policy EMP6 of this plan (Safeguarding of Employment Sites) and specific policies relating to the new uses that could result from the removal/variation of condition(s), including RES3, RES5 and RET4 (as appropriate).</u></p>	<p>settlement boundaries where the principle of main town centre uses and residential development is not normally acceptable. Although Policy RES3 does allow for the reuse of a redundant or disused permanent building on sites located outside of settlement boundaries (subject to Policy RES7), TBC does not consider that the 3 month vacancy test at Class MA of the GPDO is sufficient enough to demonstrate that a building is truly redundant or disused.</p>
PM42	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 <u>sustainable</u> 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.
PM43	Policy EMP5 New Employment	Proposals for new employment development that are acceptable in principle in accordance with policies EMP1 – EMP4 will be permitted, subject to the	Proposals for new employment development that are acceptable in principle in accordance with policies EMP1 – EMP4 will be permitted, subject to the application of	Response from County Council Minerals & Waste Authority requested that an additional policy point

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
	Development (General)	application of other plan policies, where the following criteria are satisfied:	<p>other plan policies, where the following criteria are satisfied:</p> <ul style="list-style-type: none"> • <u>Provision can be made for efficient and effective management of waste from the site that supports the waste hierarchy and encourages resource efficiency and waste reduction.</u> 	<p>is added to caveats in EMP5. 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 for adequate waste management.</p>
PM44A	Policy EMP5 New Employment Development (General) (new bullet point)		<ul style="list-style-type: none"> • <u>Proposals for new buildings shall adopt best available techniques not entailing excessive costs (BATNEEC) to adapt to and mitigate the effects of climate change</u> 	<p>*Further proposed modification post submission* Change required to address Environment Agency objection - as agreed in SO CG17 and set out in PM03</p>
PM44B	Para 4.26	Important in this context is the impact of development on the highway network, the accessibility of development having regard to sustainable transport objectives, and the impact of development on its surrounding area, both environmentally and on neighbouring uses.	Important in this context is the impact of development on the highway network, the accessibility of development having regard to sustainable transport objectives, and the impact of development on its surrounding area, both environmentally and on neighbouring uses. <u>Where there are opportunities to access sites proposed for employment development from major roads (as opposed to providing access from local roads and rural lanes), this should be the preferred</u>	<p>*Further proposed modification post submission*</p> <p>To provide clarity on preferred access arrangements for employment sites</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
			<u>option unless it is demonstrated not to be feasible or appropriate in planning and/or highways terms.</u>	
PM44C	Para 4.29 (Policy EMP5 New Employment Development (General))		<u>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 hierarchy and encourage the practice of resource efficiency and waste reduction. It should also facilitate the on-site and/or proximal management of waste, including through support for complementary activities such as utilising the services of existing neighbouring or nearby waste management facilities.</u>	New paragraph to add further detail to the additional policy caveat to Policy EMP5 relating to waste management for new employment development.
PM45A	Policy EMP6 Safeguarding of Employment Sites	Employment sites will be safeguarded for B-class employment uses and the loss or change of use of a site to non B-class uses will generally be resisted. The loss of B-class employment land will only be acceptable in principle where it can be demonstrated that:	Employment sites will be safeguarded for B-class employment uses <u>within Use Classes B and E(g).</u> and E(g). The loss or change of use of a site to non-B-class <u>alternative</u> uses <u>not falling within Use Classes B and E(g)</u> will generally be resisted. The loss of B-class <u>and E(g) class</u> employment land will only be acceptable in principle where it can be demonstrated that:	*Further proposed modification post submission* To reflect changes to Use Classes Order 1 st September 2020 - as set out in EXAM002A .
PM45B	Para 4.30 (Policy EMP6 Safeguarding	Policy EMP6 applies to all employment land falling within Class B of the Town and Country Planning (Use Classes) Order 1987 (as amended) including Class B1	Policy EMP6 applies to all employment land falling within <u>Classes B and E(g)</u> of the Town and Country Planning (Use Classes) Order 1987 (as amended) including Class B1 (a) ,	*Further proposed modification post submission*

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
	of Employment Sites)	(a, b and c), B2 and B8 and any additional or amended categories featured within an equivalent use class in any new or revised version of the Order. Policy EMP6 applies to all employment land in both allocated and unallocated sites.	b and c), B2 (General Industrial), and B8 (Storage or Distribution) and E(g) i (offices), ii (research and development) and iii (light industry), and any additional or amended categories featured within an equivalent use class in any new or revised version of the Order. Policy EMP6 applies to all employment land in both allocated and unallocated sites.	To reflect changes to Use Classes Order 1 st September 2020 - as set out in EXAM002A .
PM45C	Para 4.32 (Policy EMP6 Safeguarding of Employment Sites)	Proposals involving the loss or change of use of a site to non B-class uses where it is argued that the site is no longer fit for purpose or capable of meeting employment needs will need to be clearly justified and evidence provided to support loss of the employment land.	Proposals involving the loss or change of use of a site to non B-class <u>or E(g) class</u> uses where it is argued that the site is no longer fit for purpose or capable of meeting employment needs will need to be clearly justified and evidence provided to support loss of the employment land. In order to show that there is no demand for an existing employment site, applicants will be expected to provide evidence to the Council's satisfaction demonstrating that they have actively marketed the premises or site in question for a reasonable length of time as a going concern and at a realistic price with no success. A marketing period of 18 months will normally be required for most proposals but the Council may agree a shorter period or require a longer period depending on the scale and nature of the site in question. <u>Evidence will be required to show that all available forms of grant funding and financial support to help retain the employment use(s) have been explored and none are viable.</u> A feasibility study should also be submitted to demonstrate to the Council's satisfaction that	<p>*Further proposed modification post submission*</p> <p>To reflect changes to Use Classes Order 1st September 2020 - as set out in EXAM002A.</p> <p>Proposed modification to require exploration of funding opportunities to support employment use – particularly in light of Covid and the Covid</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
			redevelopment of the site for employment use is not viable.	recovery, which may take a number of years.
PM45D	New para after 4.33 (Policy EMP6 Safeguarding of Employment Sites)		<u>For clarity, proposals involving a change of use from Use Class E(g) to other uses within Class E will normally be allowed for existing developments without the need to apply for planning permission and thus are not subject to the provisions within this policy. Such changes of use will therefore relate to development already in Use Class E(g) and not be in breach of any pre-existing condition controlling permitted uses.</u>	*Further proposed modification post submission* To reflect changes to Use Classes Order 1 st September 2020 - as set out in EXAM002A .
PM45E	New para after new para above (Policy EMP6 Safeguarding of Employment Sites)		<u>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.</u>	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.
PM46A	Policy AGR1 Agricultural Development	Proposals for new agricultural development, including intensive and industrial scale agricultural operations, to meet the needs of the agricultural business will be permitted provided that, where appropriate:	Proposals for new agricultural development, including intensive and industrial scale agricultural operations, to meet the needs of the agricultural business will be permitted provided that, where appropriate:	Comments from GWT request this inclusion as agricultural development can have a significant

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
		<p>1. The proposed development is reasonably necessary and designed for the purposes of agriculture.</p> <p>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.</p> <p>3. The proposed development is sympathetically designed in terms of height, mass, materials, colour and landscaping where appropriate</p> <p>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.</p> <p>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</p> <p>6. 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>	<p>1. The proposed development is reasonably necessary and designed for the purposes of agriculture.</p> <p>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.</p> <p>3. The proposed development is sympathetically designed in terms of height, mass, materials, colour and landscaping where appropriate</p> <p>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.</p> <p><u>5. There is no unacceptable impact on biodiversity and ecological impacts.</u></p> <p>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 <u>water</u>, or surface water <u>or nearby watercourses.</u></p> <p>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>	<p>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>
PM46B	Policy AGR1 Agricultural Development		<ul style="list-style-type: none"> <u>Proposals for new buildings shall adopt best available techniques not entailing excessive costs (BATNEEC) to adapt to and mitigate the effects of climate change.</u> 	<p>*Further proposed modification post submission* Change required to address Environment</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
	(new bullet point)			Agency objection - as agreed in SOCG17 – see PM03
PM46C	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 <u>and also of water quality</u> ; 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 <u>and water</u> quality and increases in atmospheric nitrogen resulting from ammonia. Proposals for intensive livestock development will be expected to assess the potential impacts on air <u>and water</u> quality and demonstrate the mitigation against any adverse effects.	Minor amendments to text supporting the policy to reflect suggested changes from Gloucestershire County Council, as Lead Local Flood Authority, to policy text around water quality.
PM47	Policy TOR1 - Tourism Related Development (new bullet point)		<ul style="list-style-type: none"> <u>Proposals for new buildings shall adopt best available techniques not entailing excessive costs (BATNEEC) to adapt to and mitigate the effects of climate change.</u> 	<p>*Further proposed modification post submission*</p> <p>Change required to address Environment Agency objection - as agreed in SOCG17 – see PM03</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
PM48	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 April 2019 May 2017 , there had only been 15 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.
PM49A	Policy GRB1 – Green Belt Review		<u>7. 8.6ha land at Gloucestershire Airport, adjacent to Meteor Business Park and Bamfurlong Industrial Park, Staverton</u>	<p>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 8.6ha.</p> <p>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.</p> <p>Please note that TBC determined a hybrid planning application (ref. 20/00758/FUL) for a new business park development on 15th</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
				<p>March 2021 whereby it granted:</p> <ol style="list-style-type: none"> 1. Full permission for the provision of a new site access off the B4063, internal estate roads and associated infrastructure; 2. Outline permission for a mixed use development comprising of Class B1(c), B2 and B8 employment use on 5.9 hectares of land. <p>These permissions relate to the full extent of the proposed expansion land at Bamfurlong Industrial Park and some 1.7ha of the further (8.5ha) land promoted by Gloucestershire Airport as set out above</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
		<p>The Tewkesbury Town Centre boundary, and its primary shopping frontages, and the boundaries of the designated retail centres are identified on the Policies Map. The local centres provided within the Joint Core Strategy Strategic Allocations will also be subject to this policy.</p> <p>g. In the case of proposals at Tewkesbury Town, do not conflict with the requirements for Primary Shopping Frontages at Policy RET2.</p>	<p style="text-align: center;"> A1 Innsworth and Twigworth* A2 South Churchdown* A3 North Brockworth* A4 North West Cheltenham* A7 West Cheltenham* </p> <p>The Tewkesbury Town Centre boundary, and its primary shopping area frontages <u>Primary Shopping Area frontages</u>, and the boundaries of the designated retail centres are identified on the Policies Map. The local centres provided within the Joint Core Strategy Strategic Allocations will also be subject to this policy.</p> <p>g. In the case of proposals at Tewkesbury Town, do not conflict with the requirements for <u>the</u> Primary Shopping <u>Area Frontages</u> at Policy RET2.</p> <p><u>Footnote</u></p> <p><u>* Local Centres to be provided within JCS Strategic Allocations – not yet delivered at the time of plan preparation.</u></p>	<p>than frontage) to reflect guidance in the NPPF. Also change to RET1 to include the strategic allocations' proposed local centres in the list of Local Centres, as a result of discussions at the Hearings.</p>
PM50B	Para 6.6 (Policy RET1 Maintaining the vitality and viability of the town, borough	These retailing areas provide the location for a variety of local shopping uses which make a valuable contribution to the vitality and viability of the centre as a whole. The priority is to maintain Class A uses in these locations. Within these areas the change of use from retailing A Class uses at ground floor level will	These retailing areas provide the location for a variety of local shopping uses which make a valuable contribution to the vitality and viability of the centre as a whole. The priority is to maintain Class A uses <u>retail related uses</u> in these locations <u>which are defined for the purposes of this plan as those uses within Classes E(a) (retail, excluding</u>	<p>*Further proposed modification post submission*</p> <p>To reflect changes to Use Classes Order 1st</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
	and local centres)	generally be resisted in order not to devalue the retail attractiveness of the shopping area as a whole. However, other main town centre uses, such as leisure and community uses, can also have an important contribution towards the success of these local centres. Therefore, the Council will consider proposals for non-A class uses for ground floor units within designated centres where it is demonstrated that the alternative use is a main town centre uses and would have a positive impact of the vitality and viability of centre and support other A class retail units.	<u>hot food), E(b) (cafes and restaurants) and E(c) (financial and professional services) of the Town and Country Planning (Use Classes) Order 1987 (as amended. Proposals for new drinking establishments and hot food takeaways will also be regarded as 'retail related uses' for the purposes of this plan.</u> Within these areas, <u>where the grant of planning permission is necessary</u> , the change of use from retail <u>related</u> ing A-Class uses at ground floor level will generally be resisted in order not to devalue the retail attractiveness of the shopping area as a whole. However, other main town centre uses, such as leisure and community uses, can also have an important contribution towards the success of these local centres. Therefore, the Council will consider proposals for non-A class <u>other main town centre</u> uses for ground floor units within designated centres where it is demonstrated that the alternative use is a main town centre uses and would have a positive impact of the vitality and viability of centre and support other A-class retail <u>related uses</u> . units.	September 2020 - as set out in EXAM002A .
PM50C	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. At the time of preparation, the Strategic Allocations had not been delivered and thus it was not possible to accurately define the boundaries of their respective local centres on the proposals map. Boundaries will be defined through	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. <u>This includes the allocations at A1 Innsworth & Twigworth, A2 South Churchdown, A3 North Brockworth, A4 North West Cheltenham and A7 West Cheltenham.</u> At the time of preparation, the Strategic Allocations had not been delivered and thus it was not	*Incorporates further proposed modifications post submission* A comment requested that the JCS allocations expected to contain local centres should be identified for clarity. (This

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
		the future review of this plan. In the interim period, retail centre boundaries will be based on the permitted site layouts.	possible to accurately define the boundaries of their respective local centres on the proposals map. Boundaries will be defined through the future review of this plan. In the interim period, retail centre boundaries will be based on the permitted site layouts. <u>once the local centres within the strategic allocations have been defined through the planning process and built out, they will be considered under policy RET1.</u>	modification was submitted at same time as the plan as part of CD011a). Further change made post-submission to make it clear how the Council will approach the local centres within strategic allocations under RES1
PM50D	Para 6.9 (Policy RET1 Maintaining the vitality and viability of the town, borough and local centres)	One exception to this is office development whereby proposals for Class B1(a) office development will also be acceptable in principle on allocated employment sites and within settlement boundaries in accordance with policies EMP1-3 of this plan.	One exception to this is office development <u>within Use Class E(g)</u> whereby proposals for Class B1(a) office development will also be acceptable in principle on allocated employment sites and within settlement boundaries in accordance with policies EMP1-3 of this plan.	*Further proposed modification post submission* To reflect changes to Use Classes Order 1 st September 2020 - as set out in EXAM002A .
PM50E	Policy RET1 Maintaining the vitality and viability of the town, borough and local centres (new point 'i')		i. <u>shall adopt best available techniques not entailing excessive costs (BATNEEC) to adapt to and mitigate the effects of climate change where the proposal is for new development.</u>	*Further proposed modification post submission* Change required to address Environment Agency objection - as agreed in SOCG17 – see PM03

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
PM51A	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 falling with Class A1) within the Primary Shopping Frontages will be permitted where the alternative use proposed is also</p>	<p>Within the Tewkesbury Town Centre Boundary, as defined on the Policies Map (excluding the Primary Shopping <u>Area Frontages</u>), proposals for main town centre uses and residential uses will be supported.</p> <p>Within the Tewkesbury Town Centre ground floor Primary Shopping <u>Area Frontages</u>, as defined on the Policies Map, proposals for Class A1 <u>Class E(a)</u> retail uses will be supported. The change of use from Class A1 <u>E(a)</u> 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 <u>P</u>primary <u>S</u>shopping <u>frontage</u> <u>a</u><u>A</u>area) would be within Class <u>E(a)</u>A1; and 2. The alternative use proposed is an appropriate main town centre use which contributes towards the vitality and viability of the <u>P</u>primary <u>S</u>shopping <u>Area</u>-<u>frontage</u> <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 <u>E(a)</u>A1)</p>	<p>*Incorporates further proposed modifications post submission*</p> <p>Previous changes to policy within CD011a change wording to Primary Shopping 'Area' (rather than frontage) to reflect guidance in the NPPF. Additional wording changes required to update remainder of policy</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
		<p>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.</p>	<p>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 Shopping <u>Area Frontages</u>, proposals for residential use and main town centre uses will be supported.</p>	
PM51B	<p>Paras 6.12, 6.13, 6.14 and 6.15</p> <p>(Policy RET2 Tewkesbury Town Centre and Primary Frontages)</p>	<p>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.</p> <p>Within Primary Frontages the Borough Council will seek to retain at least 60% of the primary shopping</p>	<p>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 Class E(a) retail outlets is defined on the Policies Map as the primary shopping <u>area frontage</u>. Tewkesbury Borough Council is concerned that a higher proportion of <u>other retail related uses*</u> A2 –A5 uses within these prime areas could threaten the vitality and viability of the centre as a whole. However, the contribution of non-<u>retail (Class E(a))</u> A1 town centre uses towards the success of the primary <u>shopping area frontages</u> should also be recognised. Therefore, a flexible approach is taken where non-<u>retail</u> A1 development may be permitted providing that the predominance of <u>A1 Class E(a) retail</u> units at ground floor level is maintained within these areas.</p>	<p>*Incorporates further proposed modifications post submission*</p> <p>Change in terminology required to reflect the latest NPPF. (modification submitted at same time as the plan as part of CD011a).</p> <p>Further modifications (post submission) are to reflect changes to Use Classes Order 1st September 2020 - as set out in EXAM002A.</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
		<p>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>It is recognised that there may be exceptional circumstances where an existing shop unit does not meet the above criteria but is no longer viable for Class A1 uses. In these cases alternative proposals for main town centre uses may be considered where evidence is provided to the satisfaction of Council that there is no realistic prospect of an A1 use taking up the unit. This will be judged using the criteria set out within Policy RET7.</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>Within <u>the Primary Shopping Area Frontages</u> the Borough Council will seek to retain at least 60% of the <u>frontages</u> primary shopping area within retail use (Class <u>E(a)A1</u>) 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 <u>area</u> frontage designation.</p> <p>It is recognised that there may be exceptional circumstances where an existing shop unit does not meet the above criteria but is no longer viable for Class <u>E(a)A1</u> uses. In these cases alternative proposals for main town centre uses may be considered where evidence is provided to the satisfaction of Council that there is no realistic prospect of an <u>E(a)A1</u> use taking up the unit. This will be judged using the criteria set out within Policy RET7. However, in accordance with permitted development rights, <u>For clarity, changes of use from existing uses within Class E (a, b and c) to other uses within Class E (for example offices, gyms, day care nurseries) will not normally require the grant of planning permission by the local planning authority and thus are</u></p>	

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
			<p><u>not subject to the provisions within this policy. Such changes of use will, however, only relate to existing development already in use under Class E and not be in breach of any pre-existing condition controlling permitted uses.</u></p> <p>Outside of the primary shopping area 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>Footnote</p> <p><u>*The term 'retail related uses' is defined within the Reasoned Justification to Policy RET1</u></p>	
PM51C	New para 6.17 (Policy RET2 Tewkesbury Town Centre and Primary Frontages)		<p><u>The Council will consider imposing conditions on planning permissions for new premises within Class E on sites within Tewkesbury Town Centre in order to secure the premises within those uses in perpetuity and require express planning permission for their change of use to alternative uses. Although the Council recognises that certain non-main town centres uses, including residential, can perform a complementary role and have a positive impact on the vitality and viability of the town centre, there may be certain instances where it is necessary to retain new premises in retail or commercial uses in order to promote the vitality and viability of the</u></p>	<p>*Further proposed modification post submission*</p> <p>For the reasons explained within the proposed additional text.</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
			<p><u>town centre and help facilitate its regeneration. This may be of particular importance on sites within Tewkesbury's Primary Shopping Area and at the regeneration sites set out at Policy RET9 of this plan. Applications for the removal or variation of such conditions will be considered having regard to the overall health of the Town Centre at the time of the proposal. The tests at Policy RET2 may also be relevant where the site is located in the Primary Shopping Area. The Tewkesbury Town Regeneration Supplementary Planning Document will also be a material consideration in such matters.</u></p>	
PM52A	Policy RET3 Retail Centres	<p>Within the designated retail areas of Bishop's Cleeve, Winchcombe, Brockworth, Churchdown, Innsworth, Coopers Edge, Northway and the Local Centres provided within Strategic Allocations, proposals for retail uses (A1-A5) at ground floor level will be supported.</p> <p>The change of use from retail will only be supported where the alternative proposal is a main town centre use, which supports vitality and viability of the retail area, and no less than 50% of the remaining units within the designated area would be within retail uses at ground floor level. Proposals that do not meet the requirements of this policy will only be accepted in exceptional circumstances where it can be demonstrated that an existing unit is unviable and unsuitable for Class A1-A5 use.</p>	<p>Within the designated retail areas of Bishop's Cleeve, Winchcombe, Brockworth, Churchdown, Innsworth, Coopers Edge, Northway and the Local Centres provided within Strategic Allocations, proposals for retail <u>related</u> uses (A1-A5) at ground floor level will be supported.</p> <p><u>With the exception of those existing retail uses which have permitted development rights,</u> the change of use from retail <u>related uses</u> will only be supported where the alternative proposal is a main town centre use, which supports vitality and viability of the retail area, and no less than 50% of the remaining units within the designated area would be within retail <u>related</u> uses at ground floor level. Proposals that do not meet the requirements of this policy will only be accepted in exceptional circumstances where it can be demonstrated that an existing unit is unviable and unsuitable for <u>retail related uses</u>. Class A1-A5 use.</p>	<p>*Further proposed modifications post submission*</p> <p>To reflect changes to Use Classes Order 1st September 2020 - as set out in EXAM002A.</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
PM52B	Para 6.16 (Policy RET3 Retail Centres)	<p>These retailing areas provide the location for a variety of local shopping uses which make a valuable contribution to the vitality and viability of the centre as a whole. The priority is to maintain Class A uses in these locations. Within these areas the change of use from retailing A Class uses at ground floor level will generally be resisted in order not to devalue the retail attractiveness of the shopping area as a whole. However, other main town centre uses, such as leisure and community uses, can also have an important contribution towards the success of these local centres. Therefore, the Council will consider proposals for non-A class uses for ground floor units within designated centres where it is demonstrated that the alternative use is a main town centre uses and would have a positive impact of the vitality and viability of centre and support other A class retail units. However, to maintain the retail function of the centre, the Council will expect at least 50% of units within the designated centre to be maintained as Class A1-A5.</p>	<p>These retailing areas provide the location for a variety of local shopping uses which make a valuable contribution to the vitality and viability of the centre as a whole. The priority is to maintain <u>retail related Class A uses*</u> in these locations. Within these areas the change of use from retailing A Class uses <u>retail related uses</u> at ground floor level will generally be resisted in order not to devalue the retail attractiveness of the shopping area as a whole. However, other main town centre uses, such as leisure and community uses, can also have an important contribution towards the success of these local centres. Therefore, the Council will consider proposals for non-<u>retail related</u> A class uses for ground floor units within designated centres where it is demonstrated that the alternative use is a main town centre uses and would have a positive impact of the vitality and viability of centre and support other A class retail <u>related</u> units. However, to maintain the retail function of the centre, the Council will expect at least 50% of units within the designated centre to be maintained as <u>retail related uses Class A1-A5</u>. <u>For clarity, changes of use from existing uses within Class E (a, b and c) to other uses within Class E (for example offices, gyms, day care nurseries) will not normally require the grant of planning permission by the local planning authority and thus are not subject to the provisions within this policy. Such changes of use will however only relate to existing development already in</u></p>	<p>*Further proposed modifications post submission*</p> <p>To reflect changes to Use Classes Order 1st September 2020 - as set out in EXAM002A.</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
			<p><u>Use Class E and not be in breach of any pre-existing condition controlling permitted uses.</u></p> <p><u>Footnote</u></p> <p><u>*The term 'retail related uses' is defined within the Reasoned Justification to Policy RET1</u></p>	
PM52C	Para 6.17 (Policy RET3 Retail Centres)	It is recognised that there may be exceptional circumstances where an existing shop unit does not meet the above criteria but is no longer viable for Class A1 uses. In these cases alternative proposals for main town centre uses may be considered where evidence is provided to the satisfaction of Council that there is no realistic prospect of an A1 use taking up the unit. This will be judged using the criteria set out within Policy RET7.	It is recognised that there may be exceptional circumstances where an existing shop unit does not meet the above criteria but is no longer viable for <u>retail related uses</u> Class A1 uses . In these cases alternative proposals for main town centre uses may be considered where evidence is provided to the satisfaction of Council that there is no realistic prospect of <u>retail related uses</u> an A1 use taking up the unit. This will be judged using the criteria set out within Policy RET7.	<p>*Further proposed modifications post submission*</p> <p>To reflect changes to Use Classes Order 1st September 2020 - as set out in EXAM002A.</p>
PM52D	New para 6.19 (Policy RET3 Retail Centres)		<p><u>The Council will consider imposing conditions on planning permissions for new premises within Class E on sites within the designated retail centres in order to secure the premises within those uses in perpetuity and require express planning permission for their change of use to alternative uses. This may be necessary in order to protect the vitality and viability of the designated retail centres and secure their contribution to the sustainability of the residential areas that they serve. This will be of particular importance at the proposed local centres</u></p>	<p>*Further proposed modification post submission*</p> <p>For the reasons explained within the proposed additional text.</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
			<p><u>within the JCS Strategic Allocations in order to secure the delivery of the allocations in accordance with their respective site specific policies and enable the creation of sustainable new communities. Applications for the removal or variation of such conditions will be considered having regard to the overall health of the designated retail area at the time of the application, the tests set out within Policy RET3 and the likely impact that the loss of the facilities will have on the sustainability of the communities that they serve.</u></p>	
PM53A	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> <ul style="list-style-type: none"> 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. 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>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</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> <ul style="list-style-type: none"> 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 <u>and, where the 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.</u> 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 	Typographical error in final paragraph and changes made to clarify approach to impact assessment.

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
		allocated for that use, be required to submit a full Impact Assessment.	<p>sequentially preferable location <u>and, where the 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.</u></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, <u>will</u> be required to submit a full Impact Assessment.</p>	
PM53B	Policy RET4 Out of Centre Development (new sentence at end of policy)		<u>All proposals for new buildings shall adopt best available techniques not entailing excessive costs (BATNEEC) to adapt to and mitigate the effects of climate change</u>	<p>*Further proposed modification post submission*</p> <p>Change required to address Environment Agency objection - as agreed in SOCG17 – see PM03</p>
PM53C	New para after para 6.22 (Policy RET4 Out of Centre Development)		<u>Proposals under Policy RET4 will only be acceptable where they pass the sequential test and (where applicable) it has been satisfactorily demonstrated that there will be no significant adverse impact on the overall vitality and viability of existing centres. As the satisfaction of these policy tests is so closely linked to the specifics of the development in question (i.e. the operational requirements of the business and the type of goods sold), any subsequent proposals for alternative</u>	<p>*Further proposed modification post submission*</p> <p>For the reasons explained within the proposed additional text.</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
			<p><u>uses will require careful consideration. As such, the Council will consider imposing conditions on planning permissions for new premises within Class E on sites located outside of designated retail centres in order to secure the premises within the use specified in perpetuity and require express planning permission for their change of use to alternative uses. This is necessary to ensure that any subsequent changes of use to alternative main town centre uses do not undermine the Council's approach to main town centre uses set out at policies RET1-RET4 of this plan. Moreover, proposals under this policy may be in locations that would not be sustainable for new residential development and where such proposals would normally be resisted in accordance with Policy RES4 but would otherwise be permitted under the General Permitted Development Order.</u></p>	
PM54A	<p>Policy RET5 Single or Small groups of shops in residential areas (including new point '4')</p>	<p>Schemes to establish small single shop units or small groups of shops, within Class A1-A5, within new residential areas or existing settlements will be permitted provided that such facilities:</p> <ol style="list-style-type: none"> 1. Primarily serve the needs of the local community, and are of an appropriate size and scale; 2. Do not cause adverse impact by reason of traffic, parking, or disturbance to living conditions; and 3. Do not adversely affect the vitality and viability of existing retail centres. 	<p>Schemes to establish small single shop units or small groups of shops; <u>that are retail related uses</u> within Class A1-A5, within new residential areas or existing settlements <u>but outside of designated retail areas</u>, will be permitted provided that such facilities:</p> <ol style="list-style-type: none"> 1. Primarily serve the needs of the local community, and are of an appropriate size and scale; 2. Do not cause adverse impact by reason of traffic, parking, or disturbance to living conditions; and 	<p>*Further proposed modifications post submission* Change required to address Environment Agency objection - as agreed in SOCG17 – see PM03. And to reflect changes to Use Classes Order 1st September 2020 as set out in EXAM002A.</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
		<p>The sequential approach will not to be applied to proposals involving retail units under 280sq.m gross floorspace (either individually or cumulatively) that meet the policy criteria above. Larger retail proposals will be subject to the sequential test set at Policy RET4.</p>	<p>3. Do not adversely affect the vitality and viability of existing retail centres.</p> <p><u>4. Where the proposal involves new buildings, the best available techniques not entailing excessive costs (BATNEEC) to adapt to and mitigate the effects of climate change shall be adopted</u></p> <p>The sequential test approach will not to be applied to proposals involving retail under of <u>related</u> units under of 280sq.m gross floorspace or under (either individually or cumulatively) that meet the policy criteria above. Larger Retail <u>related</u> proposals which exceed this floorspace threshold in these locations will be subject to the sequential test set at <u>out</u> at Policy RET4.</p>	<p>Amendment to Policy RET5 submitted by RPS on behalf of Robert Hitchins Ltd (EXAM043) has been considered. Some of the requested amendments have been incorporated into the modified version of RET5 where these would improve the wording of the policy. The request by RPS for an additional threshold of 500sqm gross floorspace for small groups of shops is not however accepted. Policy RET5 seeks to restrict the scale of new retail proposals in these locations so to ensure they provide a local shopping function only and do not compete with or draw trade away from the Borough's designated retail centres. The threshold within RET5 is based on the Sunday Trading Act 1994 which defines a small shop as being up to and including 280sqm. The new Class F2</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
				<p>of the Use Classes Order 'Local community' also uses this 280sqm threshold for shops (mostly) selling essential goods, including food (Class F2a). The 280sqm threshold in RET5 applies to proposals for both individual shop units and groups of shops (i.e., a single shop unit or a group of shop units should not exceed 280sqm cumulatively). This threshold is considered to be a generous amount for small local shops, given the majority of convenience stores in the UK fall below 1999sq. ft (186sqm) (Source: The Local Shop Report 2020, Association of Convenience Stores).</p>
PM54B	Para 6.23 (Policy RET5)	Local shopping facilities provide a valuable service to communities and settlements, particularly for people who are unable to visit larger retail centres. The Borough Council will encourage the introduction of new facilities within settlements, existing or new housing areas subject to criteria which ensure that	Local shopping facilities provide a valuable service to communities and settlements, particularly for people who are unable to visit larger retail centres. The Borough Council will encourage the introduction of new facilities within settlements, existing or new housing areas subject to criteria which ensure that the proposal is of an	*Further proposed modification post submission*

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
		<p>the proposal is of an appropriate scale to serve the requirements of the immediate local community without adversely affecting other retail centres, and will not result in any adverse impact through, for example, increased traffic movements. Where new facilities are appropriate but no suitable sites exist within the communities which they are intended to serve, the Borough Council may be prepared to grant permission on sites adjacent to these areas on appropriate sites.</p>	<p>appropriate scale to serve the requirements of the immediate local community without adversely affecting other retail centres, and will not result in any adverse impact through, for example, increased traffic movements. <u>For the purposes of Policy RET5 only, the terms “retail related uses” are as defined at the reasoned justification to Policy RET1 (paragraph 6.6) and to also include uses under Use Class F.2(a) – a shop mostly selling essential goods, including food to visiting members of the public.</u> Where new facilities are appropriate but no suitable sites exist within the communities which they are intended to serve, the Borough Council may be prepared to grant permission on sites adjacent to these areas on appropriate sites. <u>In such cases, the Council will consider imposing conditions on planning permissions to remove permitted development rights allowing the subsequent change of use to alternative non-retail related uses. This may be necessary in order to ensure that the facilities continue to provide a valuable service to local communities, and to control uses that would otherwise be unacceptable in accordance with this plan.</u></p>	<p>Required in light of changes to Use Classes Order 1st September 2020 and recent amendments to the General Permitted Development Order relating to the new Class E</p>
PM55A	<p>Policy RET6 Hot Food Takeaways (includes new sentence at end of policy)</p>	<p>To avoid the over-concentration of hot food takeaways, the Borough Council will only grant permission for such proposals where they would not:</p> <ol style="list-style-type: none"> 1. Result in more than two hot food outlets (Use Class A5) adjacent to each other; and 2. Lead to more than two hot food outlets (Use Class A5) in any continuous frontage of 10 retail units or less 	<p>To avoid the over-concentration of hot food takeaways, the Borough Council will only grant permission for such proposals where they would not:</p> <ol style="list-style-type: none"> 1. Result in more than two hot food <u>takeaway</u> outlets (Use Class A5) adjacent to each other; and 	<p>*Further proposed modifications post submission* Change required to address Environment Agency objection - as agreed in SOCG17, and to reflect changes to Use</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
		<p>If these thresholds are not breached, the Borough Council will consider proposals for Class A5 uses favourably, subject to all other retail policies, providing there would be no adverse impact on the amenity of neighbouring uses with regard to noise and odour pollution.</p> <p>All applications for A5 uses must be accompanied by full details of extraction and ventilation systems required.</p>	<p>2. Lead to more than two hot food <u>takeaway</u> outlets (Use Class A5) in any continuous frontage of 10 retail units or less</p> <p>If these thresholds are not breached, the Borough Council will consider proposals for <u>hot food takeaway</u> Class A5 uses favourably, subject to all other retail policies, providing there would be no adverse impact on the amenity of neighbouring uses with regard to noise and odour pollution.</p> <p>All applications for A5 <u>hot food takeaway</u> uses must be accompanied by full details of extraction and ventilation systems required.</p> <p><u>All proposals for new buildings shall adopt best available techniques not entailing excessive costs (BATNEEC) to adapt to and mitigate the effects of climate change</u></p>	<p>Classes Order 1st September 2020 as set out in EXAM002A – see PM03.</p>
PM55B	Para 6.24 (Policy RET6 Hot Food Takeaways)	<p>Hot food takeaways (Class A5) make a valuable contribution to the viability of retail centres. However, the Borough Council seeks to prevent the over-concentration of these uses. The primary reason being that these uses are often closed during the day and operate mainly in the evening. The Council want to avoid the proliferation of inactive frontages within existing centres during the day that could have a negative impact on viability and vitality. Therefore, while Class A5 units are acceptable in principle in</p>	<p>Hot food takeaways (Class A5) make a valuable contribution to the viability of retail centres. However, the Borough Council seeks to prevent the over-concentration of these uses. The primary reason being that these uses are often closed during the day and operate mainly in the evening. The Council want to avoid the proliferation of inactive frontages within existing centres during the day that could have a negative impact on viability and vitality. Therefore, while <u>hot food takeaway uses</u> Class A5 units are acceptable in principle</p>	<p>*Further proposed modification post submission*</p> <p>To reflect changes to Use Classes Order 1st September 2020 as set out in EXAM002A.</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
		<p>designated centres, any clustering is to be controlled. This will help to ensure that takeaways are more evenly distributed throughout centres which will lessen the effect of any daytime inactivity.</p>	<p>in designated centres, any clustering is to be controlled. This will help to ensure that takeaways are more evenly distributed throughout centres which will lessen the effect of any daytime inactivity.</p>	
PM56A	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 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>Proposals for new farm shops and garden centres in the countryside, as well as extensions to them <u>existing premises</u>, 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 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 <u>instead</u> be considered against Policy RET4 <u>and the remaining provisions of this policy will therefore not apply.</u></p>	<p>*Incorporates further proposed modifications post submission*</p> <p>Representation by RPS on behalf of Robert Hitchins 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.</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</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
				<p>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> <p>(The above referenced modifications were submitted at same time as the plan as part of CD011a).</p> <p>Additional changes made to the third paragraph of the policy post submission to make it clear that if a proposal does not accord with the first two paragraphs of Policy RET8 then it does not apply and the proposal will instead be considered under RET4.</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
				<p>Additional text is also added to the reasoned justification to RET8 below (para 6.29). This change is made to address concern raised by RPS in EXAM043 that RET8 is potentially more onerous than for other out of centre retail developments. The Council would point out that RET8 is intended to provide an exception to the normal application of town centre policy (i.e. The sequential test and impact assessment) in order to facilitate the diversification of existing agricultural or horticultural businesses in the countryside, rather than to enable conventional forms of retail that have no functional relationship with the countryside.</p> <p>The suggested wording changes to Policy RET8 made by RPS are not accepted as the policy is considered to be clear</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
				<p>enough with the additional changes described above.</p> <p>Following discussions at the Hearings the Council has considered the proposal by RPS (on behalf of Robert Hitchins) for the permitted new garden centre and retail outlet centre at Ashchurch to be designated as a retail centre under Policy RET1. However, the Council has decided not to agree to this proposal. The new garden centre/retail outlet centre (which has not yet been constructed) represents an out of centre retail development which was granted permission (ref. 13/01003/OUT) as a departure from the Development Plan (retail development outside a town centre which consists of the provision of a building where the floor space to be created by the development is 5,000</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
				<p>square metres or more). Moreover, permission was granted based on the specific circumstances of that particular case, including a mitigation package to address the identified harm to Tewkesbury Town Centre. If the site were to be designated as a retail centre under Policy RES1 this would mean that it would be acceptable for a range of main town centre uses that could potentially cause more harm to the vitality and viability of Tewkesbury Town centre, particularly in light of the large size of the site. This would undermine the original circumstances under which the development was granted permission. It would also exempt any future retail proposals at the site (including extensions) from the sequential test and impact assessment requirements at Policy</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
				RET4, which could undermine the vitality and viability of Tewkesbury Town centre and nearby local centres.
PM56B	Policy RET8 Agricultural/ Horticultural Retail in the countryside (new point '4')		<u>Where the proposal involves new buildings, the best available techniques not entailing excessive costs (BATNEEC) to adapt to and mitigate the effects of climate change shall be adopted.</u>	*Further proposed modification post submission* Change required to address Environment Agency objection - as agreed in SOCG17 – see PM03
PM56C	Para 6.29 (Policy RET8)	This policy applies to proposals for retail development in the countryside that are related to agriculture or horticulture, such as garden centres and farm shops. The countryside for the purposes of this policy is defined as those parts of the Borough located outside of defined settlement boundaries. Any wider retail proposals, both in terms of use and location, will be considered using the other relevant retail policies in this plan.	This policy applies to proposals for retail development in the countryside that are related to agriculture or horticulture, such as garden centres and farm shops. The countryside for the purposes of this policy is defined as those parts of the Borough located outside of defined settlement boundaries <u>and outside of the designated retail areas referred to at Policy RET1</u> . Any wider retail proposals, both in terms of use and location, will be considered using the other relevant retail policies in this plan. <u>For clarity, where proposals for horticultural/agricultural related retail do not comply with either of the first two paragraphs at Policy RET8, the remainder of the policy does not apply and such proposals will instead be treated in the same way as all</u>	*Further proposed modification post submission* To provide further clarity in respect of the application of Policy RET8

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
			<p><u>other retail proposals. The sequential test set out at Policy RET4 (and impact assessment where required) will be applied to all proposals on sites located outside of designated centres, unless the proposal relates to a small shop or small group of shops to meet local community needs in accordance with Policy RET5. Although the specific provisions within Policy RET8 relating to landscape, traffic generation, re-use of buildings and the control of parking/ancillary structures/display areas will not apply to proposals in the countryside that are not in accordance with the first two paragraphs of this policy, these are still likely to be relevant considerations having regard to the wider policies of the Development Plan and the NPPF.</u></p>	
PM56D	Para 6.31 (Policy RET8)	The Council will seek to restrict, through the use of conditions, the range of goods sold to ensure that they are compliant with this policy. Furthermore, any additional services such as cafes will be strictly controlled and will only be permitted where they are ancillary to the sale of plants, horticultural goods or food products grown on the property.	The Council will seek to restrict, through the use of conditions, the range of goods sold to ensure that they are compliant with this policy. Furthermore, any additional services such as cafes will be strictly controlled and will only be permitted where they are ancillary to the <u>floorspace dedicated to the principal function of the premises for the</u> sale of plants, horticultural goods or food products grown on the property.	<p>*Further proposed modification post submission*</p> <p>To incorporate improved wording suggestions made by RPS in EXAM043. The Council does not however accept the inclusion of ‘≤25% of the total gross floorspace’ as a guideline for considering whether additional services are ancillary, as it would prefer</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
				to approach this matter on a case by case basis
PM57	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 infrastructure enhancements either within the site itself or to the wider Key Wildlife Site/green corridor.	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 <u>Local</u> 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 within the site itself or to the wider <u>Local</u> Key Wildlife Site/green corridor.	Reference to 'Key Wildlife Site' should be changed to 'Local Wildlife Site' following a change in terminology by the Local Nature Partnership in 2019.
PM58	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 <u>Specialist</u> Officer and/or <u>Historic England</u> English Heritage.	Typographical error.
PM59A	Para 7.26 (Policy HER3 Historic Parks and Gardens)	English Heritage has published a Register of Parks and Gardens of Special Historic Interest.	<u>Historic England</u> English Heritage has published a Register of Parks and Gardens of Special Historic Interest.	Typographical error.
PM59B	Para 7.26 (Policy HER3 Historic Parks and Gardens)		<u>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 information is available through the Gloucestershire Historic Environment Record and the Gloucestershire Historic Landscape Characterisation archives and should also be consulted.</u>	New paragraph in supporting text to clarify the position on parks and gardens that are not registered through Historic England.
PM60	Policy HER4 Archaeological	Where development will cause harm or loss, provision should be made for excavation and	Where development will cause harm or loss, <u>as identified after an appropriate assessment and</u>	Gloucestershire County Council suggested

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
	Sites and Scheduled Monuments	recording with an appropriate assessment and evaluation. The appropriate publication/ curation of findings will be expected.	evaluation , provision should be made for excavation and recording, with the an appropriate assessment and evaluation <u>publication and curation of the archive</u> . The appropriate publication/ curation of findings will be expected.	rewording of policy to provide clarity on the required process.
PM61A	Policy HER5 Locally Important Heritage Assets	<p>Policy HER5 Locally Important Heritage Assets</p> <p>Locally Important Heritage Assets will be conserved having regard to the significance 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>Policy HER5 <u>Non-Designated</u> Locally Important Heritage Assets</p> <p><u>Non-designated</u> Locally Important Heritage Assets will be conserved having regard to the significance of the asset and its contribution to the historic character of the area.</p> <p>Proposals affecting a <u>Non-designated</u> Locally Important Heritage Asset and/or its setting will be expected to sustain or enhance the character, appearance and significance of the asset.</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.
PM61B	Paras 7.31 & 7.32 (Policy HER5 Locally Important Heritage Assets)	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	Across Tewkesbury Borough there are a wide range of <u>non-designated</u> 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. <u>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 exclusively determine which assets will be subject to this policy. Assets may also be identified by the Council as part of the planning application process</u> 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	<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
		<p>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>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.</p>	<p>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><u>Non-designated</u> 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.</p>	
PM62	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, <u>local</u> 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.
PM63	Appendix 2 (Policy LAN4 Locally	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

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
	Important Open Spaces)			Gardens, Tewkesbury' is not listed at Appendix 2.
PM64	Para 8.28 (Policy LAN5 Local Green Spaces)	Further Local Green Spaces may be identified in Neighbourhood Plans providing they meet the relevant criteria within the National Planning Policy Framework.	Further Local Green Spaces may be identified in Neighbourhood Plans <u>and through any future review of the local plan</u> providing they meet the relevant criteria within the National Planning Policy Framework.	CPRE strongly supports the designation of Local Green Space. But the wording of this section implies that additional 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.
PM65A	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</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 <u>identified in Local Nature Recovery Strategies</u> will be the primary focus for landscape scale net gain delivery.</p> <p>Proposals that are likely to have a significant effect on <u>a</u> an <u>European or</u> internationally designated habitats site (either alone or in combination with other plans or projects) will not be permitted unless a Habitats</p>	<p>Response from GWT requests that, to make the policy align with the introduction of mandatory net gain through the Environment Act it 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</p>

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		<p>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 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>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 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. <u>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.</u></p>	<p>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 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</p>

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				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.
PM65B	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 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.	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), DEFRA Net Gain Summary of responses and government response (July 2019) , Environment Bill 2019-21 (January 2020)). Policy NAT1 should be interpreted and applied in the context of these emerging proposals and any resulting new statutory /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 the relevant statute and/or national policy and guidance. 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	<p>Response from Peter Brett Associates on behalf of Linden Homes requests that further information be provided on 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</p>

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			<p><u>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 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.</u></p>	<p>delivery) as there is no further detail given regarding what constitutes a ‘landscape scale net gain delivery’.</p> <p>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 issues of viability.</p> <p>However, as currently drafted, there is an expectation that such gains will be delivered on all development as matter of principle unless stated in the policy otherwise i.e., for householder development or permitted development.</p> <p>Changes are required to provide clarity over the application of the policy</p>

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				<p>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>
PM65C	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 landscaping schemes (in keeping with the landscape character area); • 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; 	<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 <u>which could, for example, include:</u></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); • 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; 	<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 populations, and therefore, provision can be of limited benefit compared to habitat creation and enhancement.</p>

Ref.	Plan Ref.	Pre-Submission Text	Modification	Reason
		<ul style="list-style-type: none"> • 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"> • 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><u>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.</u></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>
PM65D	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. <u>Planting hedges as a boundary treatment rather than fencing/walls can also be an effective way to deliver meaningful biodiversity gains in some cases.</u></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 illustrating the types of measures which may help to deliver biodiversity net gain.</p>
PM65E	Para 8.36	<p>The features, habitats and species of importance to environmental quality, biodiversity and geological</p>	<p>1. The features, habitats and species of importance to environmental quality, biodiversity and geological</p>	<p>Response from GWT advises that this paragraph</p>

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		<p>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 and veteran trees and historic orchards; and • ponds, where these make an important contribution to the quality of the environment and its biodiversity resource 	<p>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) <u>and in any Post 2020 UK Biodiversity Framework;</u> • <u>Land forming part of locally defined ecological networks identified in Local Nature Recovery Strategies;</u> • 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 • ponds, where these make an important contribution to the quality of the environment and its biodiversity resource 	<p>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>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>
PM65F	Para 8.39	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	The European and 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	It is more accurate to refer to European designated sites as well as internationally designated.

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		internationally designated sites (either alone or in combination with other plans and projects) will be subject to a Habitats Regulations Assessment.	<u>European or</u> internationally designated sites (either alone or in combination with other plans and projects) will be subject to a Habitats Regulations Assessment.	
PM65G	Para 8.46	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 management, restoration or creation could improve connectivity.	A number of the <u>The</u> priority habitats within Tewkesbury Borough <u>represent local ecological networks which, together with protected sites, Local Nature Reserves and green/blue infrastructure, will form part of the Nature Recovery Network.</u> 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 <u>there are opportunities to create, restore or enhance habitats or improve connectivity.</u> 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 <u>enhancements to local ecological networks though opportunities provided by new development. 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</u>	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. 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

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			<p><u>should seek to contribute to local ecological networks. In all cases enhancements should be informed by Local Nature Recovery Strategies.</u> 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><u>Figure 1 deleted</u></p>	<p>position re. local ecological networks</p>
PM65H	Para 8.49	<p>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.</p>	<p>This policy does not <u>necessarily</u> 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. <u>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 in the calculation of 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.</u></p>	<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</p>

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				trees/hedges and ensure that they are also recognised for their ecological value. This also relates to changes made to para 8.36.
PM651	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 AONB 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 AONB Landscape Character Assessment and the Cotswolds AONB Landscape Character Assessment, <u>and be informed by local ecological networks and nature recovery strategies in order to avoid replacement planting in inappropriate habitats or species.</u>	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.
PM66A	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.	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

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			<p data-bbox="1128 240 1803 416"><u>All proposals for major development will be required to provide a high standard of design for green infrastructure in accordance with established, recognisable standards – including the National Design Guide and Building with Nature Standards.</u></p> <p data-bbox="1128 491 1576 523">(Also see changes to paragraph 8.58)</p>	<p data-bbox="1830 240 2159 555">development undeliverable. This will ensure a justified and effective policy. In addition, the policy should address the Building with Nature level that should be achieved (“Good” or “Excellent”).</p> <p data-bbox="1830 603 2159 1134">David Lock Associates on behalf of Hallam Land Management raised 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 data-bbox="1830 1177 2159 1380">Changes have been made to reduce the burden on smaller developers and ensure such developments remain viable/deliverable. It is however reasonable</p>

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				<p>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 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 have the use of 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</p>

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				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.
PM66B	Para 8.56 (Policy NAT3 - Green Infrastructure: Building with Nature)	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. <u>Whilst the Council will only expect 'major' development² proposals to be designed in accordance with established, recognised green infrastructure standards,</u> —All developments can <u>still</u> potentially make a positive impact on the green infrastructure network and proposals will,	Changes to clarify approach to non-major development

² 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>where appropriate, be expected to make such provision at a scale that is commensurate with the development.</p>	
PM66C	<p>Paras 8.57 to 8.59 (Policy NAT3 - Green Infrastructure: Building with Nature)</p>	<p>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 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</p>	<p>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, <u>beringing</u> 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 <u>is</u> and set out the basic approach to providing it through new development. <u>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).</u></p>	<p>To address representations made against Policy NAT3, 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 (ref. EB027) and will be appended to the plan prior to adoption.</p>

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		<p>https://www.tewkesbury.gov.uk/planning-policy-evidence-base</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><u>A copy of the Building with Nature standards is available within the evidence base section on the Council's website. There are twenty three standards in total: 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.</u></p>	
PM67	Policy ENV1 Development near sewage treatment works		<p><u>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</u></p>	Response from County Council Minerals & Waste Authority requested that the policy includes provision that new

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			<p><u>achieve sustainable development in the future over the time horizon of the plan.</u></p>	<p>development does not unreasonably impact 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.</p>
PM68A	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, including requiring developments to provide flood storage on sites located within the headwaters of the Borough’s watercourses</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; <u>and undertake new hydraulic modelling where necessary;</u></p> <p>Opportunities to reduce the existing risk of flooding <u>from all sources</u> in the Borough will be sought, including, requiring developments to provide <u>contribute towards the provision of additional</u> flood storage on sites located within the headwaters of the Borough’s watercourses <u>or other techniques such as natural flood management and re-naturalisation of watercourses (link with Policy NAT2)</u></p> <p><u>New bullet points added to policy:</u></p> <ul style="list-style-type: none"> <u>Opportunities to improve and subsequently 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.</u> 	<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 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</p>

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			<ul style="list-style-type: none"> <li data-bbox="1176 279 1803 518">• <u>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.</u> <p data-bbox="1131 566 1579 598"><u>Reasoned justification (new para 8.67)</u></p> <p data-bbox="1131 638 1803 742"><u>There is a need to ensure sufficient wastewater infrastructure in any new development in order to protect water quality and the water environment. Where there are concerns 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 always be given to the management of foul drainage via the public sewer and public sewage treatment works.</u></p> <p data-bbox="1131 1029 1803 1204"><u>Applications for developments relying on anything other than connection to a public sewage treatment plant will need to be supported by sufficient evidence to understand the potential implications for the water environment.</u></p> <p data-bbox="1131 1252 1803 1348"><u>The Council will consider the phasing of development where this is necessary to allow time for infrastructure improvements to be carried out.</u></p>	<p data-bbox="1825 239 2161 774">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.</p> <p data-bbox="1825 782 2161 1380">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 drainage should wherever possible be via the mains sewer and that adequate infrastructure to accommodate this (both in</p>

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				<p>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>
PM68B	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><u>Well designed</u> Sustainable drainage systems can offer multifunctional benefits including improved water quality, and habitat creation <u>and climate change mitigation</u>, along with health and wellbeing and amenity benefits through their integration with green infrastructure. <u>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: 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 permeable paving manage surface water close to source whilst providing attractive street scenes, improving water quality and creating a habitat for wildlife.</u></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</p>

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			<p><u>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.</u></p>	<p>integration of sustainable drainage 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>
PM69	Policy ENV3 Solar Farms	Enable the conservation or enhancement of habitats and biodiversity features within the site and its surroundings.	Enable the conservation or <u>and</u> enhancement of habitats and biodiversity features within the site and its surroundings, <u>including local ecological networks identified in Local Nature Recovery Strategies .</u>	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

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				been made to address this requirement.
PM70A	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 Statement to a level proportionate to the scale of the development.	As a minimum, all major development will be required to demonstrate that the potential impacts on health <u>and wellbeing</u> 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.
PM70B	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 Commission <u>ing</u> Groups and NHS England is encouraged.	Typographical error.
PM71A	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 <u>significant cause of light pollution</u> nuisance to adjacent land users and can cause an unnecessary glow in the night sky visible for some distance. Any proposal for such lighting <u>Proposals that include floodlighting</u> must demonstrate <u>provide evidence for</u> how essential it is for the particular project <u>their need</u> . <u>Proposals that include floodlighting</u> and must be of a design to minimise environmental impact, <u>in particular, they and must not have a significant adverse impact on local ecological networks. Adverse impacts can be avoided through for example, e.g. the use of LED lights; the orientation of high intensity lighting for golf driving ranges away from ecological habitats/networks, homes and roads. In some circumstances, lighting may be required to implement automatic switch-off timing</u>	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.

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			<u>mechanism and/or not be operated at certain times of year due to local ecological circumstances.</u>	
PM71B	Policy RCN2 New Sports and Recreational Facilities (new sentence)	Proposals for recreational facilities be accessible by a choice of means of transport. The provision of additional outdoor sports pitches will be encouraged throughout the Borough where there is an identifiable need having regard to Policy RCN1, but will be assessed against the above criteria.	Proposals for recreational facilities should be accessible by a choice of means of transport. <u>Proposals for new buildings shall adopt best available techniques not entailing excessive costs (BATNEEC) to adapt to and mitigate the effects of climate change.</u> The provision of additional outdoor sports pitches will be encouraged throughout the Borough where there is an identifiable need having regard to Policy RCN1 but will be assessed against the above criteria.	*Further proposed modification post submission* Change required to address Environment Agency objection - as agreed in SOCG17 – see PM03
PM72A	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.
PM72B	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 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.	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, 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. <u>These policies are equally applicable to all scales of</u>	Highways England representations stated the need for clarification that both JCS and TBP policies are applicable to all scales of development and that new development should support the transport

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			<p><u>growth within the Borough including that specifically set out within this Borough Plan.</u></p> <p><u>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. Therefore, all development, including that proposed in this plan, needs to support the Transport Strategy underpinning the JCS.</u></p>	strategy underpinning the JCS.
PM73	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 <u>and e-bike charging infrastructure</u> 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.
PM74	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 movement of buses including appropriate passenger facilities.	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, <u>developments will be</u> 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.
PM75	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, <u>such as the wider</u> particularly Tewkesbury Town, <u>particularly by sustainable transport modes.</u>	Comment by Worcestershire County Council that there should be particular focus on sustainable transport links to the station.

Appendices

PM76A	Appendix 3 – Local Nature Conservation Sites	<u>DEERHURST</u> Gloucestershire Wildlife Trust Reserve: A small osier bed adjacent to the River Severn important as an intermittent breeding site for a locally rare bird, there is an unimproved meadow adjacent to the reserve which is also of interest.	<u>DEERHURST</u> Gloucestershire Wildlife Trust Reserve: A small osier bed adjacent to the River Severn important as an intermittent breeding site for a locally rare bird, there is an unimproved meadow adjacent to the reserve which is also of interest.	*Further proposed modification post submission* See Policies Map changes - MAP5B
PM76B	Appendix 3 – Local Nature Conservation Sites	<u>TEWKESBURY</u> Mythe Railway Gloucestershire Wildlife Trust Reserve (part): A disused railway supporting a collection of plants unusual in the Severn Vale.	<u>TEWKESBURY</u> Mythe Railway Gloucestershire Wildlife Trust Reserve (part): A disused railway supporting a collection of plants unusual in the Severn Vale.	*Further proposed modification post submission* See Policies Map changes - MAP5A.