

## Gotherington Parish Councils response to LAN 3 representations made by Copperfield under Matter 7 Submissions

Gotherington Parish Council (GPC) have the following responses as to whether LAN 3 should be properly included in the Tewkesbury Borough Plan (TBP)

<b>Copperfield Concern</b>	<b>GPC Response</b>
Strategic Gap Policy “LAN 3 “ should not be included in the TBP, as the TBP should be “non strategic” in nature.	TBC in Para 1.5 of their introduction says their plan is not intended to cover strategic items covered by the JSC, but these strategic gaps are not included in the JCS, as they are local matters and the TBP is designed to cover strategic items not covered elsewhere
Strategic gaps have already been reviewed as part of a wider review in 2011 by AMEC considering Green Belt and were not recommended	We would argue that the “Strategic Gaps” are not greenbelt and that things have changed considerably since 2011, especially the fact that Bishops Cleeve (BC) has taken a disproportionate allocation of houses for the Rural Service Centres. It is now vital to maintain the "strategic Gap"(SG) between villages to prevent coalescence.
TBP should not add further additional strategic policy constraints and there is already sufficient policy protection against unplanned development in Policy RES 2 Settlement boundaries.	Numerous applications for houses outside existing settlement boundaries have been approved at Appeal within the Borough, so this is not strong enough protection. Also the strategic gaps are just that "strategic" and need added protection as they are so critical to maintaining the character of the local areas.
The inclusion of the LAN 3 policy in the TBP would restrict TPC ability to be flexible and able to adapt to changes as per the NPPF and would prevent TBC achieving sustainable development.	We would argue that the inclusion of Strategic Gap Policy helps achieve sustainable development by preventing coalescence & all the problems this would bring, in terms of landscape & visual harm, as well as traffic & infrastructure.
If the LAN 3 Strategic Gap policy is included in the TBP it would leave limited options for the future growth of Bishops Cleeve	BC has had permission granted for over 1,544 dwellings in the last 10 years, with another 668 undecided current applications. Further development in the term of this plan is unsustainable due to the pressure on infrastructure, especially roads, schools, services, supermarkets, especially parking. BC is the largest village in England.

<p>That BC is a Rural Service Centre and should be expected to deliver further housing and employment.</p>	<p>BC has already delivered a disproportionate amount of housing compared to the other Rural Service Centre, Winchcombe. Rather than constraining future development LAN 3 seeks to protect smaller villages that are in close proximity to the larger Rural Service Centres. Two of the three SG's are between RSC's and smaller villages</p>
<p>Further restrictive policies should not be added to the TBP, when TBC are unable to maintain a 5-year housing land supply</p>	<p>Opinions remain split on whether over supply in previous years should be taken into consideration when calculating 5-year housing land supply. But regardless of this calculation we do not consider that LAN 3 is a restrictive policy, but seeks to preserve and protect settlements adjacent to larger Rural Service centres.</p>
<p>The strategic gap policies are not mentioned in the JCS, but there are other policies in the JCS that would offer the same protection</p>	<p>We consider that the areas specifically identified under LAN 3 as "Strategic gaps" are so significant they need extra protection in Tewkesbury's Local Plan.</p>

LAN 3 is seeking to preserve the distinctive identity of the smaller villages, in two of the cases these villages are adjacent to the Rural Service Centres, which by their nature are expected to expand and could be in danger of affecting the rural setting of the smaller villages. We consider there are strong arguments why all 3 of the strategic gaps under Policy LAN 3 should be included in the TBP, as they are strategically important at a Borough level and the TBP should include strategic items that are not covered sufficiently elsewhere in the JCS. Gotherington was mentioned as a single settlement in the Domesday book, so as an historic village we would like to maintain our identity.

Also strategic gaps while they are not green belt should be permanent to prevent these perpetual discussions, i.e should extend beyond the life of the plan.

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