

Tewkesbury Borough Plan Examination

List of Matters, Issues and Questions

16 December 2020

The Council are asked to respond in full to every question, and in doing so to respond to relevant comments made during the Regulation 19 consultation.

Other respondents (particularly those attending the hearings) may wish to supplement their existing representations with a further statement but there is no need to do so as submissions at Regulation 19 stage will be fully considered.

Matter 1: Duty to Co-operate and other legal requirements

Issue: Whether the Council has complied with the duty to co-operate and other legal requirements.

Questions:

1.1 Duty to Co-operate:

- Strategic planning issues relating to the borough have been addressed in the first instance through the preparation of the JCS which met the duty to co-operate. Are there any strategic matters dealt with by the TBP to which the duty applies and, if so, which other authorities and organisations are affected by them?
- If relevant, for each of the strategic matters to which the duty applies, how has the engagement been carried out, what has been the outcome and how has this addressed the strategic matter?
- Overall, has the Council engaged constructively, actively and on an on-going basis with the relevant bodies in maximising the effectiveness of the TBP in relation to the strategic matters? Has the duty to co-operate been met?

1.2 Has the preparation of the plan complied with the 2004 Planning and Compulsory Purchase Act and the relevant regulations?

1.3 Has the preparation of the plan complied with the Statement of Community Involvement?

1.4 Is the plan been prepared in accordance with the Local Development Scheme?

1.5 Have the likely environmental, social and economic effects of the plan been adequately addressed in the Sustainability Appraisal? Does the appraisal test the plan against reasonable alternatives for the distribution of housing and employment land? (This is not an opportunity to discuss the merits of individual sites).

1.6 Does the Habitats Regulations Assessment identify likely significant effects of the plan on European nature conservation sites? If so, are appropriate mitigation measures put forward, what are these and how will they be secured? Do the policies of the plan secure the necessary mitigation? Does English Nature agree with the HRA findings?

- 1.7 Does the local plan include policies designed to secure that the development and use of land contribute to the mitigation of, and adaptation to, climate change in accordance with Section 19 (1A) of the 2004 Act? If so, which?
- 1.8 How has the preparation of the plan complied with the Public Sector Equalities Duty?

Matter 2: Overall housing provision in the TBP

Issue: Whether the TBP provides for the quantity and distribution of housing required by the strategic policies of the JCS.

(Note: This matter does not include detailed discussion at site specific level which is considered under Matter 3).

Background:

JCS Policy SP1 sets the housing requirement for Tewkesbury borough as at least 9,899 new homes over the plan period 2011-31 (495 pa).

JCS Policy SP2 requires the provision of at least 7,445 new homes for Tewkesbury borough over the plan period 2011-31 through existing commitments, development at Tewkesbury town in line with its role as a market town, smaller-scale development meeting local needs at Rural Centres and Service Villages, and sites covered by any memorandum of agreement. Table SP2a sets out the anticipated sources of this provision which comprises completions, commitments, a windfall allowance, 315 dwellings to be identified through the TBP and 500 dwellings at Mitton in Wychavon district.

Rural Service Centres and Service Villages (listed in Table SP2c) will accommodate in the order of 1,860 and 880 new homes respectively.

JCS Policy REV1 requires the shortfall in housing supply in Tewkesbury borough, calculated at the time to be 2,450 dwellings, to be addressed through an immediate review of the JCS.

The Housing Background Paper (HBP) published in October 2019 sets out the Council's approach in allocating housing sites in the TBP.

The Council has recently published updated housing monitoring figures as at April 2020. These are made available in document EXAM001B on the examination website. Participants should familiarise themselves with these as they will be used as the basis for the examination. Any further statements should be based on these 2020 figures.

Questions:

- 2.1 What distinguishes non-strategic housing sites within the remit of the TBP from strategic sites within the remit of the JCS? What is the current anticipated timescale for preparation of the JCS review?
- 2.2 Given the provisions of the JCS, the current JCS review, and the subsidiary role of the TBP to allocate non-strategic sites, does the TBP make the required contribution towards meeting the housing needs of Tewkesbury borough over the plan period 2011-31? Will the remaining shortfall be provided through the JCS review, or in other ways, in the necessary timescale, and if not, is this a matter for the TBP?
- 2.3 What progress has been made in delivering the anticipated 500 dwellings to meet Tewkesbury's needs at Mitton. Is this provision agreed with Wychavon?
- 2.4 The JCS states (on page 26) that the 2015 Settlement Audit will be refreshed prior to submission of the TBP. Has this been done, and if so what are the results of the refresh and would any changes to the settlement hierarchy be justified?

- 2.5 Is the methodology used for identifying housing sites in the TBP, as described in the Housing Background Paper (HBP), appropriate? (This is not an opportunity to discuss the merits of individual allocations which will be considered under Matter 3).
- 2.6 JCS Table SP2a appears to require the TBP to identify further potential for 315 dwellings. Is this correct, and if so has this requirement been met?
- 2.7 The JCS provides for housing development at Tewkesbury town 'in line with its role as a market town' but sets no specific housing requirement for the town area. The HBP notes in paragraph 3.7 that smaller scale (non-strategic) sites within the TBP would contribute towards the shortfall in provision identified in the JCS but also states it is not appropriate for the plan to define a housing requirement for the town. Rather, the HBP states that the plan includes all the (non-strategic) sites within or adjacent to the town that are suitable for allocation given the site selection criteria. In this light, is the overall housing provision in the TBP for Tewkesbury town justified, consistent with the JCS and has the plan been positively prepared in this respect?
- 2.8 The JCS provides for about 1,860 dwellings at the Rural Service Centres, Bishop's Cleeve and Winchcombe. Under Policy RES1, three sites are allocated at Bishop's Cleeve and one at Winchcombe. As at April 2020, taking these allocations, existing commitments and completions into account, the TBP would provide for 2,044 and 354 dwellings respectively in the two settlements, a total of 2,398 dwellings and some 538 in excess of the JCS figure. In this light, is the overall housing provision in the TBP for the two Rural Service Centres justified, consistent with the JCS and has the plan been positively prepared in this respect?
- 2.9 The JCS provides for about 880 dwellings at the Service Villages. Under Policy RES1, ten sites are allocated at six of these villages. As at April 2020, taking these allocations, existing commitments and completions into account, the TBP would provide for 1,088 dwellings, some 208 above the JCS figure. In this light, is the overall housing provision in the TBP for the Service Villages justified, consistent with the JCS and has the plan been positively prepared in this respect?
- 2.10 The TBP identifies six Urban Fringe Settlements (Brockworth, Churchdown, Hucclecote, Innsworth, Longford and Uckington) which are recognised as sustainable settlements closely associated with Gloucester or Cheltenham but no specific housing requirements are set for them in the JCS. Under Policy RES1, two sites are allocated at Brockworth. In this light, is the overall housing provision in the TBP for the Urban Fringe Settlements justified, consistent with the JCS and has the plan been positively prepared in this respect?
- 2.11 On adoption of the TBP and in advance of the JCS review, would there be a satisfactory five-year housing land supply position and if so, for how long? What are the implications of any shortfall and how far, if at all, is this a matter for the TBP?

Matter 3: Housing allocations and settlement boundaries

Issue: Whether the housing allocations and settlement boundaries identified in the TBP are consistent with the provisions of the JCS and justified and whether the site-specific allocation policies are effective. In addition, in the case of Shurdington, whether exceptional circumstances have been demonstrated to justify deleting land from the Green Belt.

(Note: This matter includes site specific issues, non-site specific issues of principle are considered under Matter 2).

Background: TBP Policy RES1 allocates 21 sites for housing in 11 locations with a total capacity of up to 1,115 dwellings. Of these, two sites are within the Green Belt.

The TBP defines settlement boundaries for Tewkesbury town, the Rural Service Centres and Service Villages in the JCS settlement hierarchy plus six Urban Fringe Settlements.

The Gloucester/Cheltenham Green Belt was designated in 1968 to protect the open character of the land between the two towns and was extended in 1981 to protect the land between Cheltenham and Bishops Cleeve. The JCS deleted parts of the Green Belt to allow for strategic expansion of the two towns and JCS Policy SD5 also provides for 'a limited review of the Green Belt in other locations as necessary through the Borough Plans where this is justified by exceptional circumstances'.

QUESTIONS:

Matter 3A: Allocations outside the Green Belt

- 3.1 The TBP does not consider potential allocations in the Northway/Ashchurch area, leaving this to the ongoing strategic planning process which forms part of the JCS review. What is the area covered by these emerging strategic proposals?
- 3.2 Which settlements have adopted or emerging Neighbourhood Plans? Where relevant, are the allocations included in these also in the TBP or additional to the TBP? Are the settlement boundaries consistent? If there are any differences what are the reasons for these?
- 3.3 Considering each Policy RES1 site in turn:
 - What is the current use of the site and is there any relevant planning history? Are there any current planning applications or appeals?
 - If planning permission has already been granted or is there a resolution to grant permission, at what stage should the allocation be deleted from the plan and the notation on the Policies Map be changed to that for a committed site?
 - Is the housing allocation justified given the site selection criteria, constraints, infrastructure requirements and potential impacts? Is the site either deliverable during the next five years or developable during the plan period?
 - Is the indicative capacity figure for the allocation justified?
 - Where there is a site specific policy for the allocation, is this justified, consistent with national policy and would it be effective?
 - In some cases further specific questions are set out below.

In turn:

Tewkesbury

TEW1 - Land at Odessa Farm

TEW2 - Land adjacent to John Moore Primary School, Wheatpieces

TEW3 - Spring Gardens

TEW4 - Healings Mill

- Should the site boundary be amended to exclude the SSSI?

Bishop's Cleeve

BIS1 – Land adjacent Breaker's Yard

BIS2 – Land at Homelands Farm

BIS3 – Land at allotments off A435

- Is new primary school provision necessary at Bishops Cleeve? Would the allocation of site BIS3 for a primary school or mixed housing/primary school be justified? If not, where should provision be made?
- Would a further allocation or settlement boundary change to reflect the permission for housing granted on appeal at Stoke Road, Bishops Cleeve be justified? What are the proposals for the Cleeve Wood Properties land?

Winchcombe

WIN1 – Land off Delavale Road/Orchard Road

- Would the proposal amount to major development in the AONB and, if so, are there exceptional circumstances and would it be in the public interest? (The tests in NPPF paragraph 172).
- To what extent would the proposal conserve and enhance landscape and scenic beauty in the AONB?
- If acceptable in principle, is the precise boundary of the site justified in the light of the topography? Should areas of adjacent land be included?

Coombe Hill

COO1 – Land at junction of A38/A4019

COO2 – Land adjacent to the Swan PH

Gotherington

GOT1 – Land to the north of Malleson Road

GOT2 – Land to the north of Gretton Road

Maisemore

MAI1 – Land at Bell House Farm

Shurdington – see Matter 3C

Toddington

TOD1 – Land adjacent to Pheasant Public House

Woodmancote

WOO1 – Land adjacent to Oxbutts Caravan Park

Forthampton

FOR1 – Land at corner of Bishops Walk and School Lane

- Forthampton is not a Service Village and has a limited range of services and facilities. HBP paragraph 9.3 states the allocation is locally driven with the support of the local community. However, in response to the Regulation 19 consultation the Parish Council do not support the allocation. In this light, is the allocation justified? As an alternative, would Policy RES4 provide a suitable basis for considering any scheme that comes forward?

Brockworth

BRO1 – Land adjacent to Hucclecote Road and Golf Club Lane

BRO2 – Nerva Meadows, Gloucester Business Park

- Both Brockworth sites: Is the impact of the allocations on the Cotswold Commons and Beechwoods SAC in relation to additional recreational pressure adequately addressed?

Matter 3B: Settlement Boundaries outside the Green Belt

Tewkesbury town, Rural Service Centres & Service Villages (except Shurdington)

- 3.4 Four settlements which have defined boundaries in the adopted 2006 plan do not have defined boundaries in the TBP - Apperley, Ashleworth, Dumbleton & Gretton - is this justified? (Policy RES4 would apply to these villages).
- 3.5 Would defined boundaries for any other freestanding settlements be justified?
- 3.6 What are the criteria that have been used to define the settlement boundaries in the plan and have they been followed consistently? Are the detailed settlement boundaries for the various settlements justified and effective? Would any changes be justified to accommodate any recent planning permissions or for any other reason?
- 3.7 Is the slightly different approach taken in defining the settlement boundaries of Coombe Hill, Minsterworth and Toddington justified? What levels of development might result from the extended boundaries? Have the implications for these settlements been fully considered and would any changes be justified?

Urban Fringe Settlements

- 3.8 The TBP defines settlement boundaries for the six Urban Fringe Settlements it identifies (Brockworth, Churchdown, Hucclecote, Innsworth, Longford and Uckington). Would settlement boundaries for any other urban fringe settlements or built up areas on the edges of Gloucester and Cheltenham be justified? (eg land west of Cockroft Lane, north of Grovefield Way, north of Leckhampton Lane)
- 3.9 What are the criteria that have been used to define the settlement boundaries in the plan and have they been followed consistently? Are the detailed settlement boundaries for the various settlements justified and effective? Would any changes be justified to accommodate any recent planning permissions or for any other reason?

Matter 3C: Allocations and Settlement Boundaries in the Green Belt

Shurdington

- 3.10 When was the Green Belt inset boundary for the settlement first defined and has it been reviewed subsequently?
- 3.11 Have exceptional circumstances been established for allocations and an extended inset boundary for Shurdington within the Green Belt? Has the need for these been established through the JCS?
- 3.12 What evidence is there that the additional housing development that would be provided by the allocations and extended boundary at Shurdington is needed? In addition to the proposed allocations, how much additional infill development is likely? Are there any other reasonable options for meeting this need on brownfield land or land outside the Green Belt?
- 3.13 What are the criteria that have been used to define the extended settlement boundary in the plan and have they been followed consistently? Is the detailed boundary proposed justified and effective? Should open land to the east of the A46 Shurdington Road be excluded from the Green Belt?
- 3.14 What would the effect of the allocations and changes to the Green Belt inset boundary at Shurdington be on the five Green Belt purposes and on the openness of the land?
- 3.15 In relation to the three Shurdington housing allocations in Policy RES1:
- What is the current use of the site and is there any relevant planning history? Are there any current planning applications or appeals?
 - Is the housing allocation justified given the site selection criteria, constraints, infrastructure requirements and potential impacts? What would be the effect on the five Green Belt purposes and the openness of the land? Is the site either deliverable during the next five years or developable during the plan period?
 - Is the indicative capacity figure for the allocation justified?
 - Is the site specific policy for the allocation justified, consistent with national policy and would it be effective?

In turn:

SHU1 – Land at corner of Badgeworth Lane and A46

SHU2 – Land north of Leckhampton Lane

SHU3 – Garage site at Harrison (not in the Green Belt)

Matter 4 Provision for Gypsies & Travellers and Travelling Showpeople

Issue: Whether the TBP provides the quantity and distribution of pitches and plots for Gypsies, Travellers and Travelling Showpeople required by the strategic policies of the JCS.

Background: JCS Policy SD13 requires the provision of 78 pitches during the plan period within Tewkesbury Borough for Gypsies and Travellers and 24 plots for Travelling Showpeople. The requirement is broken down into five-year periods. The policy protects existing sites and provides criteria for the assessment of potential site allocations in the TBP and future planning applications. TBP Policy GTTS1 proposes allocations to assist meeting these needs.

Questions:

- 4.1 Given the evidence of the Gloucestershire GTAA 2017, taking account of existing commitments and possible windfall sites, does the TBP make sufficient provision for gypsies, travellers and travelling showpeople in accordance with the requirements of JCS Policy SD13 and Planning Policy for Traveller Sites (PPTS) 2015?
- 4.2 On adoption of the TBP, would there be an identified five year supply of specific suitable, available and deliverable sites, and a sufficient supply of developable sites thereafter?
- 4.3 Policy GTTS1 allocates three sites for Gypsies and Travellers and one site for Travelling Showpeople. How have these sites been identified from amongst reasonable alternatives?
- 4.4 Turning to these four sites, in each case:
 - What is the current use of the site and is there any relevant planning history? Are there any current planning applications or appeals?
 - Is the allocation justified given the site selection criteria in JCS Policy SD13, relevant constraints, infrastructure requirements and potential impacts such as visual impact and highway safety? Will the site have an acceptable environment for residential use? Will the site, together with others, dominate the nearest settled community contrary to PPTS paragraph 14?
 - Are the landowners intentions clear? Is the site available and likely to be delivered during the plan period?
 - Is the indicative capacity figure for the allocation justified? Is the scale of the site suitable for management purposes?
 - In the case of the two sites within the Green Belt, should the sites be inset into the Green Belt to comply with PPTS Policy E and, if so, are there exceptional circumstances which justify this? If not, would the 'very special circumstances test' frustrate delivery?

In turn:

Gypsy and traveller sites:

Land adjacent to Hygrove Place, Hygrove Lane, Minsterworth

Land adjacent to Fieldview, A38, The Leigh

Hillview, Bamfurlong Lane, Staverton (Green Belt)

Travelling showpeople site:

Land off Old Gloucester Road, Staverton (Green Belt)

- 4.5 Is there a need for the provision of any transit gypsy and traveller pitches, and if so, are there any suitable sites for allocation, or should Policy GTTS1 be reworded to allow for suitable sites to come forward?

Matter 5 Employment land and policies, including Gloucestershire Airport

Issue: Whether the TBP provides for the quantity and distribution of employment land as required by the strategic policies of the JCS, whether the employment allocations identified in the TBP are justified, and whether the general employment policies in the plan are positively prepared, justified, effective and consistent with national policy and the JCS. In addition, in the case of the Staverton/Gloucestershire Airport Business Parks, whether exceptional circumstances have been demonstrated to justify deleting land from the Green Belt.

Background:

JCS Policy SP1 sets the requirement for at least 192 hectares of B class employment land in the JCS area over the plan period 2011-31 to support approximately 39,500 new jobs. This is to be delivered by development in existing urban areas, existing commitments, urban extensions to Cheltenham and Gloucester and a strategic allocation at Ashchurch.

Importantly, there is no district by district split of this requirement, and thus no specific requirement for Tewkesbury Borough.

Policy SP2 states that, of this overall requirement, at least 84 hectares will be delivered within the identified strategic allocations (leaving 108 ha to be delivered elsewhere) with any further capacity identified in district plans.

Paragraph 3.2.20 states the sources of supply will include the strategic allocations, existing undeveloped available sites and potential additional smaller sites in the urban and rural areas. Provision would be monitored and any shortfall rectified through plan review.

JCS Policy SD1 sets out how employment development will be supported, including the redevelopment of existing sites, employment allocations, new land at Tewkesbury town, plus small scale proposals at Rural Service Centres/Service Villages and in the wider countryside adjacent to an existing settlement or employment site.

The Employment Land Background Paper (ELBP) published in October 2019 sets out the Council's approach in allocating employment sites for development in the TBP. Appendix D lists the selected sites totalling 95 ha, 49 ha of which are existing commitments (allocations and unimplemented planning permissions) and 46 ha of which are new or extended sites.

The Gloucester/Cheltenham Green Belt was designated in 1968 to protect the open character of the land between the two towns and was extended in 1981 to protect the land between Cheltenham and Bishops Cleeve. The JCS deleted parts of the Green Belt to allow for strategic expansion of the two towns and JCS Policy SD5 also provides for 'a limited review of the Green Belt in other locations as necessary through the Borough Plans where this is justified by exceptional circumstances'.

Overall provision

- 5.1 What distinguishes non-strategic employment sites within the remit of the TBP from strategic sites within the remit of the JCS?
- 5.2 The TBP does not consider potential allocations in the Northway/Ashchurch area, leaving this to the ongoing strategic planning process which forms part of the JCS review. What is the area covered by these emerging strategic proposals and are they likely to include any employment land?

- 5.3 Taking account of the latest position in Gloucester City and Cheltenham, the JCS review, and the subsidiary role of the TBP to allocate non-strategic sites, does the plan provide sufficient employment land to meet the requirement of the JCS for at least 192 ha of B Class employment land during the plan period, 108 ha of this outside the strategic allocations? How are the elements of this provision made up, is there a remaining shortfall and, if so, is this a matter for the TBP?

Employment allocations outside the Green Belt

- 5.4 Is the methodology used for identifying employment sites in the TBP, as described in the Employment Land Background Paper (ELBP), appropriate?
- 5.5 Policy EMP1 designates ten existing sites as Major Employment Sites and Policy EMP2 designates fourteen existing sites as Rural Business Centres. Is the selection of these sites justified by a robust process and should any other existing employment sites be designated on the same basis?
- 5.6 According to ELBP Appendix D these sites include 49 ha of existing undeveloped capacity (allocations and unimplemented planning permissions). Are these sites still suitable and deliverable for employment use over the plan period?
- 5.7 In several cases, extensions to the sites are proposed in the TBP on adjacent land, not previously allocated. According to ELBP Appendix D, outside the Green Belt, these total 38 ha of new land. In each case:
- What is the current use of the site and is there any relevant planning history? Are there any current planning applications or appeals?
 - Is the new employment allocation justified given the site selection criteria, constraints, infrastructure requirements and potential impacts? Is there evidence the site is deliverable during the plan period?

In turn:

Malvern View Business Park, Bishops Cleeve

- Allocation of 15.9 ha site, but subsequent planning permission for housing has reduced the available employment site to 2.24 ha. What are the proposals for the Cleevewood Properties land? An amendment to the plan is required in any event.

Homelands Farm, Bishops Cleeve 1.4 ha (new site)

Highfield Farm, Hardwicke 2.7 ha

Knightsbridge Business Centre, The Leigh/Coombe Hill 2.2 ha

Highnam Business Centre 1.9 ha

Orchard Industrial Estate, Toddington 6.5 ha

Brockridge Farm Business Centre, Twyning 3.8 ha

Duddage Manor Business Park, Twyning 0.42 ha

Isbourne Business Centre, Winchcombe 2.11 ha

Gloucestershire Airport

- 5.8 What is the role of Gloucestershire Airport in aviation/transportation terms and how does it contribute to the local economy? What is the future Strategic/Business Plan for the Airport and what evidence is there that part of the existing Airport is redundant for aviation purposes?
- 5.9 What are the acceptable uses of the Non-Essential Operational Area of the airport as opposed to the Essential Operational Area and all-purpose business/industrial parks with no particular connection to the airport?
- 5.10 Is the expansion of the Non-Essential Operational Area proposed by Policy GRB2 consistent with JCS Inset Map 1 and the limitations of JCS Policy SD5? Does the JCS allow for changes to be made in the subsidiary TBP? Is the change justified in the light of the evidence? What are the implications for the Essential Operational Area? What would be the effect of the expanded allocation on the five Green Belt purposes and the openness of the land?

Staverton/Gloucestershire Airport Business Parks

- 5.11 Have exceptional circumstances been established to delete Green Belt designation from four sites¹ on the B4063 at Staverton/Gloucestershire Airport to allow for employment allocations? Have these been fully evidenced and justified? Has the need for the Green Belt deletions been established through the JCS?
- 5.12 What is the evidence that the additional employment development that would be facilitated by the Green Belt deletions is needed? Are there any other reasonable options for meeting this need on brownfield land or outside the Green Belt? Is this a strategic matter for the JCS review?
- 5.13 In relation to the four sites:
- What is the current use of the site and is there any relevant planning history? Are there any current planning applications or appeals?
 - Is the employment allocation justified given the site selection criteria, constraints, infrastructure requirements and potential impacts? Is the site developable during the plan period?
 - What would be the effect of the allocation on the five Green Belt purposes and the openness of the land?
 - (In the case of sites 2-4) How have the boundaries of the sites been selected? Does the proposal conflict with the Gloucestershire Airport Essential Operational Area designation shown on JCS Inset Map 1 and the limitations of JCS Policy SD5? Does the JCS allow for changes to be made in the subsidiary TBP? What are the implications for the Essential Operational Area?

¹ Three sites were proposed for deletion from the Green Belt and allocation as employment sites in the Pre-Submission TBP; following the Regulation 19 consultation a further site is being proposed for allocation by the Council. The fourth site has therefore not been subject to Regulation 19 consultation and so only preliminary discussion will be possible at the initial hearing sessions. Should the proposal progress further, this would be subject to full public consultation.

In turn:

1. Extension to Ashville Business Park – 3.9 ha
2. Extension to Meteor Business Park – 1.3 ha
3. Extension to Bamfurlong Industrial Park – 4.2 ha
4. Further land between Meteor & Bamfurlong Parks – 8.5 ha

Bamfurlong Operational Policing Site

- 5.14 Is Policy GRB3 and its supporting text relating to the assessment of proposals on this site consistent with national policy, in particular NPPF paragraphs 143 and 144, and the requirement that inappropriate development should only be approved in very special circumstances?

General employment policies

- 5.15 If relevant, do policies EMP3 - EMP6 apply to the JCS Strategic Allocations in Tewkesbury Borough? If so, are they justified and effective in the context of Gloucester or Cheltenham (as the case may be), and if not, is this clear?
- 5.16 Are the general employment policies EMP3 – EMP6 in the plan positively prepared, justified, effective, consistent with national policy and the JCS?

Matter 6 General Housing Policies

Issue: Whether the general housing policies in the plan are positively prepared, justified, effective, consistent with national policy and the JCS.

Question:

- 6.1 If relevant, do the general housing policies in the TBP apply to the JCS Strategic Allocations in Tewkesbury Borough? If so, are they justified and effective in the context of Gloucester or Cheltenham (as the case may be), and if not, is this clear?
- 6.2 Are the general housing policies in the plan positively prepared, justified, effective, consistent with national policy and the JCS? In some cases there are specific additional questions. In turn:

(RES1 Housing allocations are considered under Matter 3)

RES2 Settlement boundaries (the policy that applies, the boundaries themselves are considered under Matter 3)

RES3 New housing outside settlement boundaries

RES4 New housing at other rural settlements

- Is the 5% or 10 dwelling growth limit guidance justified and effective?

RES5 New housing development

RES6 Rural exception sites

RES7 Re-use of rural buildings for residential use

- Should the policy refer to disused as well as redundant buildings to be consistent with NPPF para 79 (c)?

RES8 Subdivision of existing dwellings

RES9 Replacement dwellings

RES10 Alteration and extension of existing dwellings

RES11 Change of use of agricultural land to domestic garden

RES12 Affordable housing

- Is the policy consistent with the NPPF, JCS Policy SD12, justified and effective?

RES13 Housing mix

- Is the policy justified and has the effect on viability been taken into account?

RES14 Specialist accommodation for older people

(GTSS1 is considered under Matter 4)

DES1 Housing space standards

- Is the use of the standards justified and has the effect on viability been taken into account?

Matter 7 Other Policies

Issue: Whether the other policies in the plan are positively prepared, justified, effective, consistent with national policy and, where relevant, the JCS.

Question:

- 7.1 If relevant, do the other general policies in the TBP apply to the JCS Strategic Allocations in Tewkesbury Borough? If so, are they justified and effective in the context of Gloucester or Cheltenham (as the case may be), and if not, is this clear?
- 7.2 To be effective, should the plan include a policy relating to proposals in the Green Belt based on national policy in the NPPF and to replace Policy GRB1 in the existing 2006 adopted Local Plan?
- 7.3 Are the various AGR, TOR, RET, DES, HER, LAN, NAT, ENV, HEA, RCN, COM and TRAC policies in the plan positively prepared, justified, effective, consistent with national policy and, where relevant, the JCS? In some cases there are specific additional questions:
 - RET1 Maintaining the vitality and viability of the town, borough and local centres
 - Is the Tewkesbury town centre boundary and the extent of the primary shopping frontages justified?
 - Are the boundaries of the other designated retail centres justified?
 - Should the local centres in the strategic allocations be specified?
 - RET2 Tewkesbury town centre and primary frontages
 - Is the policy effective given the changes to the use classes order?
 - RET3 Retail centres
 - Is the policy effective given the changes to the use classes order?
 - Should the local centres in the strategic allocations be specified?
 - RET5 Single or small groups of shops in residential areas
 - Is the policy effective and is the 280 sq m figure justified?
 - (DES1 Housing space standards is considered under Matter 7)
 - LAN1 Special Landscape Areas
 - Is the policy justified in the light of JCS Policy SD6? What is the evidence base for the policy area and how does it relate to the AONB or Gloucestershire Landscape Character Assessment?
 - LAN2 Landscape Protection Zone
 - Is the policy justified in the light of JCS Policy SD6? What is the evidence base for the policy area and how does it relate to the Gloucestershire Landscape Character Assessment?
 - LAN3 Strategic Gaps
 - Are the identified gaps and the policy justified?
 - COM3 Telecommunications
 - Is the reference to health justified?
 - TRAC2 Cycle network & infrastructure
 - Is a reference to e-bike charging infrastructure justified?

Tewkesbury Borough Plan

Preliminary Hearing Timetable February/March 2021

Week One

Tues 16 February am – Matter 1 Duty to co-operate and other legal requirements
pm - Matter 2 Overall housing provision in the TBP

Wednesday 17 February – Matter 2 continued

Thursday 18 February – Matter 4 Provision for gypsies/travellers and travelling showpeople

Week Two

Tuesday 23 February – Matter 3A Housing allocations outside the Green Belt

Wednesday 24 February – Matter 3A continued

Thursday 25 February – Matter 3B Settlement Boundaries outside the Green Belt

Week Three

Tuesday 9 March – Matter 3C Housing allocations/settlement boundaries in the Green Belt

Wednesday 10 March – Matter 5 Employment land and policies, inc Gloucestershire Airport

Thursday 11 March – Reserve for continuation of Matters 3C or 5

Week Four

Tuesday 16 March - Matter 6 General housing policies

Wednesday 17 March – Matter 7 Other general policies

Thursday 18 March – Reserve

When expressing interest in attending Matters 3A or 3B, please specify which specific allocation(s) or settlement(s) you wish to discuss as the sessions may be split.

When expressing interest in attending Matters 6 or 7, please specify which policies you wish to discuss as the agenda will be focussed down onto particular policies.