

**Tewkesbury Borough Council
Statement of Common Ground**

with

Bromford Housing Association

1. Introduction

- 1.1. This statement of common ground is between Tewkesbury Borough Council (TBC) and Bromford Housing Association (BHA) (represented by RPS Consulting Services Ltd) in relation to the allocation of 'Land off Delavale Road/Orchard Road, Winchcombe' for housing development within the Pre-Submission Tewkesbury Borough Plan (PSTBP). The land is proposed to be allocated as site WIN1 under Policy RES1 of the PSTBP. The indicative capacity of the allocation in the PSTBP is 80 dwellings.
- 1.2. This statement follows previous correspondence regarding the promotion of the site by P E Duncliffe Ltd (PED), who is a local strategic land promoter. BHA have taken over as formal promoter of the site and will now take the site forward through the local plan process. BHA are a major housebuilder and local housing association and have significant experience developing sites within the local area.
- 1.3. The statement sets out the areas of common ground and disagreement between the two parties in relation to the site. It focuses only on matters relating to the developability and deliverability of the site, including its consistency with the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011-2031 (JCS) and the National Planning Policy Framework (NPPF).

2. BHA Regulation 19 Consultation Response

- 2.1. The consultation response from BHA on the WIN 1 site allocation is summarised below.
- 2.2. The response received from BHA in relation to Policy RES1 (Housing Site Allocations) comments that the purpose of the allocations in the PSTBP is to address (in part) the Borough's adopted JCS shortfall of 2,455 dwellings at April 2017, against the JCS housing requirement of at least 9,899 dwellings to be delivered between 2011 and 2031. Further commentary in relation to this matter is set out in BHA's representation against the 'Introduction' section of the plan whereby an objection is made to the statement at paragraph 2.10 indicating that it is not the role of the Tewkesbury Borough Plan to meet the shortfall identified by the Joint Core Strategy, this is the subject to an immediate review of that plan to deal with this at a strategic scale. BHA considers that the JCS does not expressly limit the contribution the (Tewkesbury Borough) Plan can make to addressing the shortfall in land supply in the Borough. The draft wording (of the Introduction) merely reflects the Council's intended purpose for the Plan. The contradictory nature of the wording means it is not soundly-based (not justified). Furthermore, the soundness of the JCS (and with it the role to be played by district plans prepared by individual authorities) is predicated, in part, on each Council being able to demonstrate a continuous five-year supply of housing land. At the point of adoption of the JCS (2017) Tewkesbury were able to demonstrate 6.3 years supply. However, it is now the case that the Council cannot demonstrate at least five years supply (the latest position is 4.3 years based on the Council's own calculation in the TBC Five Year Supply Statement August 2019). This represents a significant change in local circumstances that would suggest a greater part could, and should, be played by the Plan in addressing the housing short fall in Tewkesbury.

- 2.3. The identified 'supply' at the RSCs would total 2,109 dwellings (paragraph 3.19 (of the PSTBP) refers), which would exceed the notional plan target at RSCs 'in the order of' 1,880 dwellings under JCS Policy SP2. However, in respect to the proposed distribution of growth across the Borough, the quantum of development assigned to Winchcombe is unduly and unjustifiably limited and therefore not consistent with the role and function of the RSCs in the adopted JCS, and also seeks to establish a policy that ignores evidence of past under-delivery at Winchcombe since 2011 when compared to other settlements in the hierarchy.
- 2.4. The Council proposes a single site allocation at Winchcombe (WIN1) for 80 new dwellings within the Plan. However, this represents just 7.6% of the total additional proposed allocations in the Plan at Winchcombe (80 out of 1,049) and would result in just 3.7% of the JCS housing requirement being delivered at Winchcombe RSC from all identified sources of supply. Based on the foregoing analysis, it is clear that the level of growth identified at Winchcombe will be significantly restricted compared to other settlements and locations across the Borough, which will undermine the adopted strategy as well as national policy that seeks to focus growth on those settlements and locations that offer the best opportunity to achieve sustainable development. The proposed under-provision of development at Winchcombe RSC is made more stark based on the outcome of the Council's own 'disaggregation' exercise that has informed the proposed distribution of growth in the Plan. The Council determined that 597 dwellings would represent an 'indicative requirement' for Winchcombe settlement, which would still only represent 6% of the JCS housing requirement, but which would increase the provision at Winchcombe to a level commensurate with the settlement's intended role and function based on criteria set out in the JCS (Policy SP2). Consequently, the provision of 370 dwellings at Winchcombe in the Plan clearly runs counter to the Council's own evidence-based indicative requirement for the settlement (c. 38% lower).
- 2.5. A recent appeal decision at Bishop's Cleeve¹ issued on 11th November 2019 further exacerbates the imbalance in housing provision across the two RSCs since the evidence base for the Pre-Submission Plan was prepared. This has resulted in approval for an additional 215 dwellings in a settlement which has seen a significant amount of development since 2011 (1,380 dwelling completions), compared to 257 dwellings completed at Winchcombe over the same period. The worsening imbalance in supply that is clearly now evident raises significant concerns and provides further justification to support the provision of additional housing at Winchcombe in the TBP. Given the JCS housing requirement is expressed as an 'at least' figure, and the level of growth assigned to the RSCs (and SVs) is not based on a 'cap' or maxima, BHA does not advocate for the re-apportionment of growth to Winchcombe through any reduction in numbers at other settlements as compensation as this could undermine the ability of other settlements to deliver on the adopted strategy for those locations. On the contrary, BHA suggests that further consideration should be given to the scale of growth directed to Winchcombe in order to bring the planned level of growth more closely in line with the Council's own indicative distribution of growth based on its role, function and accessibility characteristics. This could be done through, for example, by ensuring sufficient flexibility exists in the Plan to allow, where justified, an increase in densities of existing sites, as well as consideration of additional sites.
- 2.6. With regard to site WIN1 specifically, BHA supports, in principle, the proposed allocation of this site in the Plan. The delivery of this site will assist in both meeting the housing needs (and shortfall) of the Borough, as well as promoting sustainable development in a location where it will enhance or maintain the vitality of rural communities, thus promoting opportunities for the

¹ Land at Stoke Road, appeal ref. APP/G1630/W/19/3229581

settlement to grow and thrive in accordance with national planning policy for rural areas (NPPF 2019, paragraph 78). In that sense, the Plan is consistent with national policy and the proposed allocation is soundly-based in principle. However, BHA has a number of concerns regarding the aspects of the overall approach to the site and the criteria in Policy WIN1, which are set out below.

- 2.7. Firstly, BHA does not support the indicative capacity of 80 dwellings as proposed on the site. BHA considers that the site could accommodate more development than that suggested in the indicative capacity, whilst ensuring that any new built development would be confined to the 115m contour line. Even after taking into the rural location and need to respond to local character and context, the provision of 80 units would represent only 11.6 dwellings per hectare (against a site area of 6.9ha). In our view, this is not an effective use of land and a higher density development is possible without undermining the characteristics of the site or surrounding area. This is based on preliminary work carried out by the site promoter and would form the basis for future discussions with the Council on a detailed design and layout. In our view, the most appropriate solution to facilitate a development that can properly address these matters is through an adjustment to the site allocation boundary to include the full extent of the site consistent with the submission to the Council's Assessment of Land Availability (ALA) (under reference WIN017). BHA submits, on behalf of the site promoter, an indicative layout that clearly demonstrates the potential to accommodate additional development on the site, as part of a landscape-led strategy.
- 2.8. In relation to the site specific criteria within Policy WIN1, BHA generally considers that these can be adequately addressed as part of sensitively-designed proposals for the site. However, in relation to landscape issues affecting the design layout of the site, BHA objects to the requirement that all aspects of the development should be located below the 115-metre contour line. This would include, as proposed in the emerging Plan, provision of green infrastructure including open space. However, in our view this approach is not justified by the relevant evidence, principally the Winchcombe Town Landscape and Visual Sensitivity Study November 2014 Final Report (WLVSS) carried out by Toby Jones Associates Ltd. The site allocation boundary for WIN1, and thus a revised settlement boundary, appears to follow the 115m contour line set out in figure 4 of the WLVSS. In BHA's view, the proposed wording in the Plan (under Policy WIN1) is currently based on an interpretation that the 115m contour represents an absolute limit to any development beyond the 115m contour including the provision of open space, rather than in our view representing, 'the edge of built development i.e. new buildings, to allow for the softening of the settlement edge beyond'. It is our view that an appropriate 'feathered edge' could include the provision of well-designed open space and landscaping sensitive to the locality and context of the area west of Winchcombe. Such matters could be addressed at the planning application stage, though it is important to build flexibility into the allocation at this stage to be able to deal with this. Consequently, in order achieve this, the settlement boundary should be adjusted to follow the existing landscape features provided by existing hedges and footpaths that run along the western edge of the site as shown in the Council's ALA. This would facilitate the provision of new built development along the 115m contour with the provision of open space and enhanced landscaping beyond up to the edge of the allocation, consistent with the adjusted settlement boundary. In addition, this would also create a more clearly defined and defensible settlement boundary rather than one that fails to follow clear features of the local landscape.
- 2.9. With regard to the green Infrastructure and biodiversity criteria within Policy WIN1, the policy makes reference to contributions towards 'wider green infrastructure and deliver biodiversity net gains'. BHA wishes to object to this wording for two key reasons. Firstly, whilst national policy

seeks to protect and enhance biodiversity (NPPF 2019, paragraph 174 refers) it also suggests that plans should "...identify and pursue opportunities for securing measurable net gains for biodiversity..." (paragraph 174a). Consequently, there may be circumstances where there is no opportunity to secure 'measurable' net gains. However, as currently drafted, there is an expectation that such gains will be delivered on all development as matter of policy. BHA suggest that the policy goes beyond the spirit and intentions of the NPPF and so is not soundly-based (not consistent with national policy).

- 2.10. Finally, in relation to the flood risk criteria within Policy WIN1, BHA maintains the view that this site is not affected by flood risk to any great extent and therefore a specific policy criterion under Policy WIN1 is not justified. Evidence on this is set out in the SFRA Level 2 Assessment (November 2017), carried out on behalf of the Council by JBA Consulting. Table 9-2 of the report indicates that 97% of Site B (referred in the SFRA as 'Winchcombe Site 7') is located within Flood Zone 1, which denotes land at the lowest risk of flooding. In addition, the risk of surface water flooding is also considered to be low (less than 1% of a 100-year flood event) with up to 2% of the site potentially affected by a 1 in 1000- year event. The overall risk of flooding as a result of any development on the site is therefore considered to be extremely low. This is consistent with the Environment Agency 'Flood Map for Planning' for Winchcombe showing the site in relation to known flood risk sources (from fluvial/watercourses). The map illustrates the main source of potential flood risk being mainly located along the eastern and south-eastern boundary of Winchcombe, and at a considerable distance from the site. Based on the foregoing analysis, BHA does not consider it justified to make explicit any policy requirement regarding flood risk under Policy WIN1 seeking to go beyond the JCS and national policy advice on dealing with flooding. It is noted that BHA does not have any objections to the preparation of flood related evidence, in accordance with the NPPF and JCS, and will do so in support of an application.
- 2.11. A full copy of the consultation response received from PED is provided at Appendix 1 to this statement, the substance of which is endorsed by BHA as the promoters of the Site.

3. Tewkesbury Borough Council Response

- 3.1. With regard to the role of the PSTBP in addressing the Borough's housing shortfall, as the PSTBP is a second tier plan that sits beneath the JCS, it must be consistent with and seek to deliver the policies and proposals of the JCS. The primary role of the PSTBP insofar as housing allocations are concerned is to implement the part of the Borough's housing requirement apportioned to the Rural Service Centres (RSCs) and Service Villages (SVs) at Policy SP2 of the JCS, and to allocate non-strategic sites at Tewkesbury Town. Policy SP2 states that the RSCs will accommodate in the order of 1,860 new homes and the SVs will accommodate in the order of 880 new homes. In this regard, the PSTBP will deliver in excess of the requirement for the RSCs and SVs, by 13% and 20% respectively, and will allocate non-strategic sites at Tewkesbury town. While site allocations in the TBP will assist with housing land supply, it is not considered to be the role of the PSTBP to accommodate the overall plan period shortfall and secure the delivery of a five year housing supply for the Borough. These are considered to be strategic matters that are in the process of being addressed through the JCS review which is currently underway², including looking at the role of the Tewkesbury Garden Town in meeting development needs.³ This is in accordance with

² Regulation 19 consultation on a draft plan is expected to take place in early 2021

³ The area around Ashchurch was awarded 'Garden Town' status in March 2019 and is expected to deliver approximately 10,000 houses over the period to 2041. Funding has been secured from MHCLG (Housing Infrastructure Fund) to construct a new bridge over the railway line at Ashchurch to unlock development potential in the area.

Policy REV1 of the JCS (Gloucester and Tewkesbury Housing Supply Review) which makes it clear that the JCS review will cover the allocation of sites to help meet any shortfall in housing supply against the JCS housing requirements for the respective authorities, and JCS Policy SP2 which states that the identification of any additional urban extensions to help meet the unmet needs of a LPA must be undertaken through a review of the plan. Any additional site allocations made through a local plan must be in conformity with the JCS spatial strategy.

- 3.2. Indeed, this purpose of the 'district' plans in the JCS area was acknowledged by the examining Inspector for the recently adopted Cheltenham Plan (CP) whereby it was accepted that any shortfall in housing land supply is to be dealt with through the JCS review and the examination will be confined to the issue of whether the plan meets the requirement for the CP in the JCS⁴.
- 3.3. It is also important to note that the JCS plan period shortfall is now significantly lower than 2,455 dwellings which was the position in April 2017. Since then there have been a number of significant commitments in the Borough including outline planning permission for 850 dwellings at Fiddington⁵ and 215 dwellings on land at Stoke Road, Bishops Cleeve⁶, in addition to a number of smaller scale developments. Moreover, the housing allocations in the PSTBP will deliver approximately 1,000 additional dwellings over and above those required to meet the housing requirements for the RSCs and SVs set out at Policy SP2 of the JCS. This is 317% higher than the Tewkesbury Borough Plan potential of 315 dwellings included within the sources of housing supply set out at Table SP2a of the JCS. As demonstrated within TBC's response to the Inspector's Preliminary Queries⁷, with the inclusion of the housing allocations within the PSTBP the JCS plan period shortfall would be reduced to 530 dwellings.
- 3.4. With regard to the extent of housing growth proposed at Winchcombe, and the 'indicative requirement' for Winchcombe (which is set out at Appendix D of the Tewkesbury Borough Plan Housing Background Paper (2019))⁸, TBC point out that the identified requirement for the RSCs is set out at Policy SP2 of the JCS which states that they will accommodate in the order of 1,860 new homes. This is a universal requirement for the RSCs combined and Policy SP2 does not disaggregate it between the 2 individual settlements. The requirement to be met at the RSCs in accordance with the JCS spatial strategy is therefore 1,860 homes. The PSTBP housing site allocations at the RSCs would, together with the existing plan period commitments (as at April 2019), deliver approximately 2109 new dwellings in total which would exceed the identified requirement by 249 dwellings. Furthermore, as noted by BHA, planning permission was granted (on appeal) in November 2019 for a further 215 dwellings at Bishops Cleeve RSC. This brings the total plan period supply at the RSCs to 2324 dwellings, exceeding the JCS SP2 requirement by some 464 dwellings. Whilst it is acknowledged that the Housing Background Paper (2019) (HBP) produces an 'indicative' requirement for Winchcombe of 597 dwellings, this has only been produced as a means of disaggregating the Policy SP2 requirement of 1,860 dwellings at the RSCs. It is not based on a locally assessed housing need for Winchcombe.
- 3.5. Moreover, TBC would stress that the disaggregation process is only the starting point for considering an appropriate level of development for each rural settlement. As stated in the HBP, in addition to the 'top down' approach of the disaggregation process, there should also be a 'bottom up' element whereby the availability of sustainable sites at each settlement will also be

⁴ https://www.cheltenham.gov.uk/downloads/file/6620/ed002_insp_initial_letter_re_cheltenham_plan

⁵ Appeal ref. APP/G1630/W/18/3210903

⁶ Appeal ref. APP/G1630/W/19/3229581

⁷ Doc ref. EXAM001B within examination library – see Appendix 4.

⁸ Doc ref. EB013 within Examination Library

a factor in determining the most appropriate distribution of development. For example, there may be situations where a settlement is unable to achieve its disaggregated requirement due to a lack of suitable, sustainable sites or due to constraints such as the Green Belt and AONB. Conversely, there may also be situations where a settlement can exceed its disaggregated requirement due to suitable, sustainable sites being available at the settlement. Winchcombe is located within the Cotswold AONB and the level of growth planned at the settlement in the PSTBP has been informed by the availability of suitable sites which can be developed without causing significant harm to the AONB, and in accordance with paragraph 172 of the NPPF which advises that great weight should be given to conserving and enhancing landscape and scenic beauty in (inter alia) Areas of Outstanding Natural Beauty....the scale and extent of development within these designated areas should be limited. On this basis, TBC considers that the PSTBP is delivering on the JCS spatial strategy and does not agree with BHA that it is necessary to increase the scale of growth proposed at Winchcombe within the plan.

- 3.6. With regard to the indicative site capacity for WIN1 within the PSTBP (80 dwellings), this has been informed by the Council's landscape evidence base, notably the Winchcombe Town Landscape and Visual Sensitivity Study (WLVSS)⁹, through observations on site and in consultation with the Council's Landscape Officer. The WLVSS assesses WIN1 as part of Area 1A. The study tests an assumed development parameter of a new settlement boundary at the 115m contour. The visual appraisal within the study finds that there would be a moderate adverse effect on views from public rights of way surrounding Winchcombe. It concludes that development up to the 115m contour if designed sensitively with a feathered built edge and new boundary planting would not materially alter the appreciation of views from long distance recreation routes either from the east or the west.
- 3.7. Advice received from the Council's Landscape Officer (LO) during the site assessment process identifies that the site is within a sensitive location on the developed edge of Winchcombe and bordering open countryside. The topography rises to the northern part of the site, with the southern part of this site being at a lower level¹⁰. The northern part of the site is on ascending terrain and the most visually prominent. The site would be seen from public footpaths and from the wider countryside within the Cotswold AONB escarpment. The LO advised that a detailed assessment of the potential landscape and visual impacts of development is essential for assessing the site's suitability as a potential development allocation.
- 3.8. Having regard to the WLVSS the PSTBP defines a new settlement boundary along the 115m contour. This also represents the western edge of site allocation WIN1 which has the effect of reducing the site area from that submitted to the Council's ALA. On the advice from the Council's Landscape Officer, Policy WIN1 requires that suitable developable areas on site must be informed by a Landscape and Visual Impact Assessment (LVIA). In the absence of such detailed evidence it was necessary to consider an appropriate developable area and site capacity based on the existing evidence set out in the WLVSS which identifies the 115m contour as being a limit to development. Based on all built development, supporting infrastructure and open space being within this parameter and using the density multiplier within the Council's ALA methodology (63% developable area) and a relatively low density of 20dph (which is considered appropriate within this AONB setting) it was considered that the site can accommodate approximately 75

⁹ Doc ref. EB019 within examination library

¹⁰ This is consistent with the WLVSS which assesses the south-east part of the site separately as Area 1B and finds its visual impact to be low or negligible

dwellings¹¹. It is acknowledged that this represents a very cautionary approach to the site capacity and TBC accepts that a detailed, site specific LVIA may indicate higher (or lower) levels of development for the site. Indeed, the notes to Policy RES1 make it clear that the indicative capacities within the plan are approximates and detailed design proposals may indicate that greater or fewer dwellings can be accommodated.

- 3.9. TBC considers it to be essential however that the developable areas on site and the overall quantum of development are determined through careful consideration of its landscape impacts via a Landscape and Visual Impact Assessment and in consultation with the Council's Landscape Specialist and other local stakeholders. TBC acknowledges the soundness objections to WIN1 raised by the Cotswold Conservation Board¹² and the strength of local opposition to the allocation through the Regulation 19 consultation. As such, TBC does not consider it to be appropriate to agree a higher quantum of development on site at this stage of the plan making process. Instead, TBC maintains that the site allocation capacity of 80 dwellings is appropriate unless it can be demonstrated to the Council's satisfaction that a higher quantum of development can be accommodated without causing an unacceptable adverse impact on the AONB.
- 3.10. Officers at TBC have considered previous proposals submitted by PED involving approximately 127 dwellings up to the 115m contour but remain concerned over the extent of the development and its impact on the AONB. The 115m contour was used in the WLVSS as being 'indicative' of an appropriate limit to westward expansion. Detailed analysis of the site and the impact of proposals on the AONB is still required. In developing the most appropriate landscape led scheme it is important to recognise that the 115m contour is indicative and is not a target to build up to.
- 3.11. TBC does not agree with BHA that proposals on the site should only pursue 'opportunities' for net gain. Biodiversity net gain is a key provision of the Environment Bill and will soon be a mandatory, statutory requirement. This provision within Policy WIN1 is also consistent with paragraph 170(d) of the NPPF which advises that policies should minimise impacts on and provide net gains for biodiversity, and paragraph 174(b) which advises that plans should identify and pursue opportunities for securing measurable net gains for biodiversity. In this instance it is considered that the site presents significant opportunities to provide habitat creation through blue/green infrastructure. TBC would also point out that Policy WIN1 does not explicitly require the net gain to be delivered on site. TBC acknowledge that, whilst the expectation is for the required net gain to be delivered on site through site specific ecological enhancements, 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. Indeed, as part of the 'Schedule of Changes to the Pre-submission Tewkesbury Borough Plan' TBC has proposed updated wording to this effect within the reasoned justification to Policy NAT1 of the PSTBP (Biodiversity, Geodiversity and Important Natural Features) which provides more specific policy in relation to biodiversity net gain¹³.
- 3.12. With regard to the flood risk criterion within Policy WIN1, the policy requires that proposals on the site should address the site specific FRA requirements set out within the Level 2 SFRA (JBA Consulting, November 2017)¹⁴. There is a watercourse running along the southern boundary of

¹¹ The site capacity was increased to 80 dwellings for the PSTBP to take into account the availability of additional land (under separate ownership) to the south-east of the site adjacent to Orchard Road.

¹² Available to view at CD005 within examination library

¹³ Proposed modifications PM51 and PM52 within Schedule of Changes document ref. CD011a within examination library

¹⁴ Doc ref. EB025 within examination library

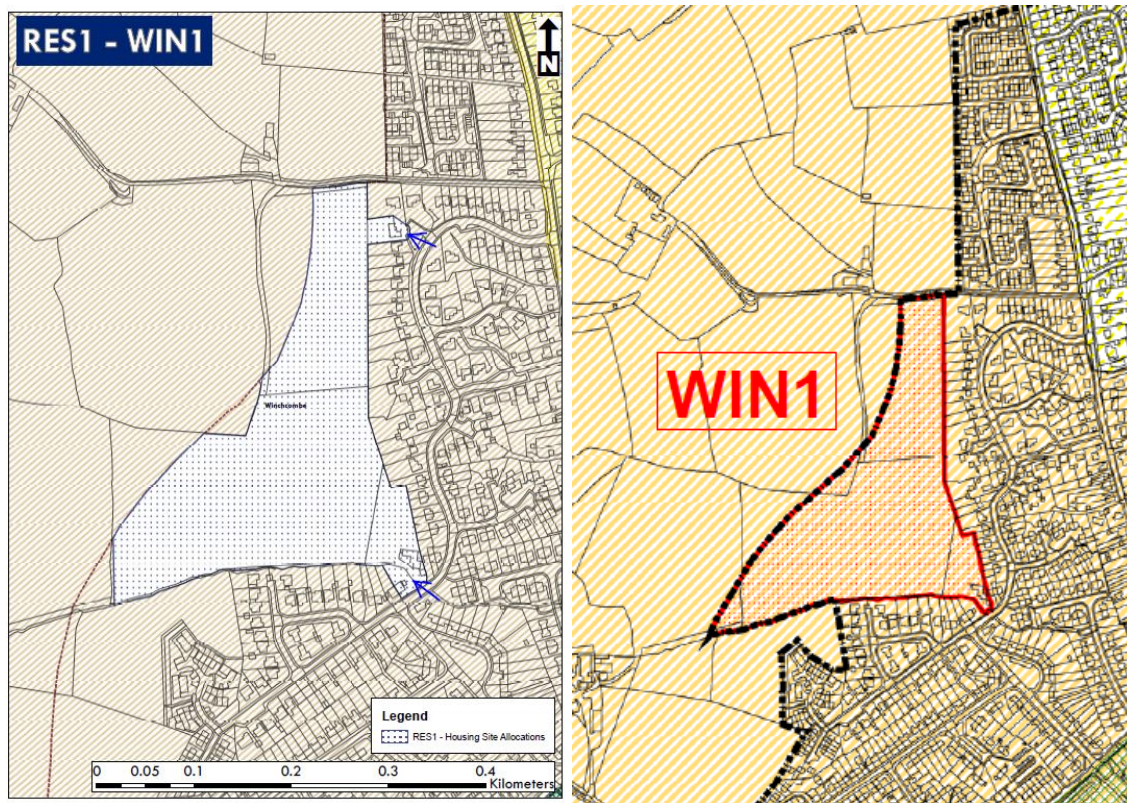
the site. As the catchment of this watercourse falls below 3km², flood zones are not provided for the site on the Environment Agency's Flood Map for Planning. Whilst the Level 2 SFRA finds that only a small area to the south/south east of the site would potentially be at risk of flooding, it is important to note that the SFRA uses 2D generalised modelling techniques which only provide a high-level indication of flood risk. No site visits or channel survey work have been undertaken as part of the assessment. The SFRA therefore advises that developers should confirm the flood risk to the site by undertaking detailed hydraulic modelling using channel topographic survey. This is considered to be essential for achieving an accurate understanding of the flood risk to the site. Moreover, it is considered entirely appropriate for the policy to reflect its evidence base and, as part of the 'Schedule of Changes to the Pre-submission Tewkesbury Borough Plan', TBC has suggested modifications to the site specific policies for all other sites assessed in the SFRA to make reference to the site specific FRA requirements within the Level 2 SFRA.

- 3.13. On the above basis TBC does not consider it to be appropriate or necessary at this stage to propose any modifications to the extent of the site allocation or the site specific policy requirements within Policy WIN1 to address objections made by BHA. TBC acknowledges however that work is ongoing in relation to the detailed planning of the site and the determination of an appropriate quantum of development having regard to the site's constraints including the Cotswold AONB. TBC considers that these matters can be reviewed through the examination process.

4. Updated Position Following Regulation 19 Submission

- 4.1. Since representations were made to the pre-submission plan, BHA have become involved in the promotion of the scheme. As a housebuilder-led scheme, BHA have commenced pre-application discussions with the Council and are in the process of developing a detailed scheme, informed by an appropriate suite of evidence based documents.
- 4.2. It is anticipated that this SoCG can be updated in the weeks leading up to the Examination Hearings, if new evidence is prepared or agreements reached which are relevant to the deliverability of the site through the TBP.
- 4.3. TBC has taken the opportunity, post-submission to review discrepancies in the mapping associated with site WIN1 (**Appendix 2**). This includes a redrawn boundary to exclude small areas of overlap with adjoining field parcels, reflective of the 115m contour line. For the Inspector's benefit, the mapping also illustrates the principal access point to the Site, which, in the north east corner would be taken from Delavale Road. This involves the demolition of a frontage property on Delavale Road within BHA's control and parties agree that for completeness, the allocation boundary should include this land. For clarity these revisions are illustrated at Figure 1 below. The site allocation boundary in the PSTBP is shown on the right with the proposed revised boundary shown on the left. The blue arrows show the proposed access points: to the north east is the principal access proposed by Bromford; and to the south east is another proposed access point for the smaller development including the alternative pedestrian/cycle route, which remains contested by BHA (Further details are set out in point 4.4 below).

Figure 1 – Proposed modifications to allocation boundary



- 4.4. TBC would like to take this opportunity to identify the availability of an additional access point into the site allocation. This relates to an area of land of approximately 0.45ha within the south-east corner of the allocation with a frontage to Orchard Road. This land is under separate ownership and is the subject of a separate Statement of Common Ground with the respective site promoter¹⁵, whose intention is for their land to either be developed as part of the wider allocation or be developed independently as a standalone development. The Statement Of Common Ground confirms that a pedestrian and cycle route can be provided through their land in order to connect the wider WIN1 allocation (promoted by BHA) to Orchard Road. TBC considers that this additional pedestrian/cycle access opportunity would enhance the sustainability of Site WIN1 by providing a more direct and convenient access to bus stops, the nearby Primary School and library, and the services and facilities within Winchcombe Town Centre. This would be of particular benefit to those residents living in the southern and south-western parts of the site and those with disabilities and reduced mobility. For example, walking distances for residents living in the south-west corner of the site would be approximately 1.3km to the school and 1.4km to the town centre if journeys are made via BHA's proposed access to Delavale Road to the north-east of the site. These journeys would be reduced to 633m to the school and 1km to the town centre if the additional access to the south-east of the site can also be provided. Moreover, the site has a sloping topography with the south-east corner being the lowest point at approximately 100m AOD rising up to approximately 110m AOD at the point of the proposed access to the north-east of the site. This gradient, together with the distances involved, may present access difficulties for those with disabilities and reduced mobility, and thus increase reliance on the private car to access day to day facilities.

¹⁵ [Tewkesbury Borough Plan examination library — Tewkesbury Borough Council](#)
Examination Document SOCG 16

- 4.5. TBC consider that the provision of the pedestrian/cycle access would be consistent with NPPF paragraph 102 which advises that transport issues should be considered from the earliest stages of plan-making and development proposals so that (inter alia) opportunities to promote walking, cycling and public transport use are identified and pursued; paragraph 108 which advises that, in assessing sites that may be allocated for development in plans, it should be ensured that (inter alia) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; and paragraph 110(b) which states that development should (inter alia) address the needs of people with disabilities and reduced mobility in relation to all modes of transport.
- 4.6. Policy WIN1 of the PSTBP requires proposals on site to promote accessibility to local services and public transport by pedestrians and cyclists by ensuring permeability through the site and connectivity with adjacent streets. TBC consider that the provision of the additional pedestrian/cycle connection through to the wider allocation would help to achieve this objective. As such TBC would like to suggest amended policy wording to promote the provision of the access as part of the development(s). TBC acknowledge however that there may potentially be technical constraints associated with the provision of the access. For example, the land in question contains a watercourse, although this appears to be in culvert through the majority of the land. The land also contains a row of mature trees following the same alignment as the watercourse, although these are not subject to a Tree Preservation Order. Furthermore, the land is constrained by an existing property which may potentially need to be demolished to make way for the access if existing trees are to be retained. This is particularly the case if the access is to be provided as part of a vehicular access (for example, to serve any new dwellings on the land that would result from its allocation). The property in question is not however listed or located in a Conservation Area. Notwithstanding these constraints, there does potentially appear to be an unobstructed route from Orchard Road through the curtilage of the property known as 'Pickering House' into the wider allocation. TBC accepts however that without the benefit of an evidenced design to show how the intended pedestrian/cycle access could be appropriately created, there remains some uncertainty over its suitability in planning terms. TBC do not however consider that this should prevent the potential for the access to be explored as part of the site's policy requirements.
- 4.7. BHA have concerns regarding the inclusion of the 0.45ha parcel of land to the south-east of the site within the allocation. BHA do not consider that the inclusion of additional land proposed for housing and for a secondary access is necessary in order to make the allocation sound and should not be taken forward as part of a modified policy. The land concerned is in separate ownership to the wider WIN1 allocation and is being promoted separately to the rest of the site. Should the two parties fail to reach agreement over its inclusion, there is the potential that the failure to provide a secondary pedestrian cycleway could prevent the development being delivered. This would impact upon the Council's housing supply and its ability to meet its housing targets. There is also the potential that its inclusion could impact upon the feasibility and viability of the development, thus affecting the housing mix and affordable provision being offered.
- 4.8. BHA consider the current access arrangements presented in the north east corner of the site onto Delavale Road to be perfectly adequate to serve the development. Whilst the shorter distances to schools and services highlighted by the Council are noted, BHA considers the distances resulting from the use of the identified access in the north-east corner are acceptable and would meet the technical requirements of Manual for Streets and the NPPF Paragraphs 108 and 110(b) with regard to sustainable transport modes and addressing the needs of people with disabilities and reduced mobility. BHA would also point to recently approved developments on

Gretton Road at the northern extent of the settlement, where distances to local schools and services were considered acceptable as a matter of consistency in local decision taking. Site WIN1 is situated nearer to those schools and services than those sites. It is also noted that an application is also currently being considered on land immediately to the north of WIN1 under 20/00892/OUT (Land off Kydderminster Road) which has received no objection from Gloucestershire County Council as Local Highways Authority (LHA). That site is also located less-favourably than WIN1 in terms of its distance from local schools and services. On this basis, BHA do not consider the inclusion of the secondary access to be necessary. Whilst BHA do not support the inclusion of the additional 0.45ha parcel within the allocation, should the Council continue to persist with its inclusion, BHA would recommend a clearer demarcation of land uses to ensure that it is clear these are two sites to be developed independently. BHA has a number of concerns relating to the soundness of this parcel, and factors which may impede delivery. It is noted that this site is not without constraints to be overcome. Principally, it is noted that there is not currently enough clearance to deliver an access to this site for residential purposes, or to allow for a pedestrian/cycle access. This would involve the demolition of a frontage property onto Orchard Road, as the access link would be otherwise unachievable and would give rise to residential amenity concerns. This would give rise to a key viability challenge to overcome. From a technical perspective, it is noted that this land has topographical challenges, rising over 10 metres from Orchard Road to the land controlled by BHA, and lies adjacent to the area BHA are proposing for attenuation as the lowest area of the site. In addition to this, the site is noted to contain a substantial amount of mature trees which would be lost in facilitating any development on this land parcel, with little opportunities for replacement or compensation.

- 4.9. In addition, whilst BHA do not consider that a secondary access is needed to facilitate this development or to make the proposal sound, if the Inspector is minded to accept this additional change, BHA would request the policy allows the exploration of other means for a secondary access, rather than being tied to the land identified by the Council for the reasons set out above.
- 4.10. To reflect the concerns expressed by BHA, whilst promoting the provision of the pedestrian/cycle access, TBC would like to suggest a modification to Policy WIN1 to require that 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. This suggested modification is set out at Appendix 2.

5. Deliverability of Site WIN1

- 5.1. To demonstrate that the site is 'deliverable' as defined in the NPPF, BHA has advised on the delivery trajectory set out at Table 1. On the presumption that the Tewkesbury Borough Plan is adopted in late 2020/early 2021, the start date for the delivery trajectory has been set at 2021-22. As BHA are promoting the site for approximately 110 dwellings (which differs to the indicative capacity of 80 dwellings), delivery information has been provided for both scenarios.

Table 1 - Delivery trajectory for Site WIN1 (land within BHA control)

Site name	Location	Capacity	Delivery				
			2021-22	2022-23	2023-24	2024-25	2025-26
Land off Delavale Road/Orchard Road	Winchcombe	80 dwellings		30	40	10	
		110 dwellings		30	40	40	

- 5.2. As shown at Table 1, the site will be 'built out' within the five year period from 2021/22 to 2025/26. Confidence on this trajectory can be taken from the fact that the scheme is in the control of a housebuilder, who has the ability to bring the site forward without the impediments of marketing the proposals. BHA are also in the progress of preparing a planning application for submission to the Council, which can be approved following adoption of the TBP, providing further assurances of early delivery. Site WIN1 will therefore assist TBC in demonstrating a five year supply of deliverable housing sites.
- 5.3. In addition, BHA remain committed to delivering affordable housing on site at levels above the current affordable housing policy requirement. This represents a significant benefit to the local area, ensuring early delivery of a significant supply of additional affordable homes.

6. Areas of Common Ground

- 6.1. TBC and BHA are agreed on the following matters:
- Winchcombe is a Rural Service Centre and thus providing housing site allocations at the settlement would be consistent with the JCS Spatial Strategy set out at Policy SP2.
 - The settlement of Winchcombe supports a number of services and facilities, and parties are agreed that the proposal of WIN1 represents a sustainable location for development.
 - Site allocation ref. WIN1 is soundly based in principle. The site is capable of being developed without causing an unacceptable adverse impact on the landscape and scenic beauty of the Cotswold AONB. Suitable developable areas on site must however be informed by a Landscape and Visual Impact Assessment.
 - The site can be accessed safely through the provision of vehicular and pedestrian access onto Delavale Road, as identified on the amended proposals map, with suitable visibility splays possible in both directions.
 - The capacity of WIN1 (80 dwellings) is indicative and detailed design proposals (informed by specialist landscape advice) may indicate that a greater number of dwellings can be appropriately accommodated on site
 - The site is deliverable and developable as defined in the NPPF. It is available for development now and it will be delivered within the five year period starting from the adoption of the Tewkesbury Borough Plan, and can contribute towards the current housing shortfall in the Borough.

7. Areas of Disagreement

- 7.1. The areas of disagreement between TBC and BHA are as follows:
- That it is the role of the PSTBP to address the JCS plan period shortfall
 - Although parties accept that of the RSC's, Bishop's Cleeve has taken a significant proportion of growth at this level, the Council does not agree that further consideration should be given to the scale of growth directed to Winchcombe in order to bring the planned level of growth more closely in line with the Council's indicative requirement for Winchcombe set out set out at Appendix D of the Tewkesbury Borough Plan Housing Background Paper (2019)

- That there should be flexibility within the Plan to allow, where justified, an increase in densities of existing sites. BHA do not agree with the use of a density of 20dph being used to justify the indicative 80 dwelling site capacity. BHA is aware of other schemes within the surrounding area, and within the Cotswold AONB, where higher development densities have been permitted.
- There is disagreement over the exact position of the site allocation boundary. The site allocation boundary should be expanded to include the full extent of the land submitted to the Council's Assessment of Land Availability (ALA). BHA see no reason why POS could not be provided north of the 115m contour line.
- BHA raise a concern that the site allocation boundary does not follow physical land boundaries on the ground which will make land assembly particularly difficult. For example, the inclusion of a small triangular section on the western side which extends into the adjacent field.
- That a secondary, pedestrian and cycle access should be provided to the south-east of the site connecting the development with Orchard Road (this would be in addition to the proposed vehicular/pedestrian access in the north-east corner of the site). The modified wording set out at Appendix 2 is not agreed between the two parties.
- The site controlled by BHA can appropriately accommodate additional development of around 110 dwellings, unless evidence is provided to demonstrate this point. In addition to this, BHA consider that the quantum of development can be met on this site, without the need for for land within the wider allocation boundary to the south east.
- The wording of Policy WIN1 in relation to the requirement to deliver biodiversity net gain
- That Policy WIN1 should include a policy requirement regarding flood risk

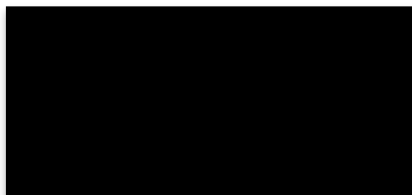
Signed



Planning Policy Manager

Dated: 12 February 2021

Signed



Cameron Austin-Fell. RPS Planning obo BHA

Dated 12 February 2021

Pre-Submission Tewkesbury Borough Plan

The Tewkesbury Borough Plan (TBP) is a plan for the area that will allocate sites for housing and employment development as well as provide planning policies to guide future development in the Borough. It provides a plan covering the period from 2011-2031. The Pre-Submission TBP is the next step in process of creating the final version of plan.

The 'Pre-Submission' TBP is the final stage of consultation before the plan is submitted to the Secretary of State for Communities and Local Government for its independent examination. Following submission, an appointed Planning Inspector will begin the examination of the plan and consider whether it is sound and legally compliant.

All comments received will be submitted to the Secretary of State and considered as part of the examination by the Planning Inspector.

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

We are seeking your views on the policies and the proposals in the draft plan and would encourage you to respond by using the online consultation facility at: www.tewkesbury.gov.uk/boroughplan

However, you may also send completed forms to us via email and post:

- Email: localplanconsultation@tewkesbury.gov.uk
- Post: Local Plan Consultation, Tewkesbury Borough Council, Gloucester Road, Tewkesbury, GL20 5TT

The consultation opened on 4th October 2019 and you will be able to submit comments up to 5pm on Monday 18th November 2019.

The following response form has two parts:

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

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

PART A: Personal Details – only complete once

Title: Mr

Name: Cameron Austin-Fell

Company: RPS Consulting Services Ltd

Email Address: [REDACTED]

Address: [REDACTED]

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

Client Name: [REDACTED]

Client Organisation: [REDACTED]

Keeping you updated

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

YES x

NO

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph Policy Policies Map

Do you consider the Local Plan is :

1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

RPS notes the inclusion of a number of sites (21 in total) proposed for allocation in the Plan (listed in Table 1 to Policy RES1). The proposed allocations are linked to individual site-specific policies that include a range of criteria to guide the preferred form and nature of development on those sites. RPS notes that only 13 sites have their own specific policy, though it is not clear as to the reason for the apparent discrepancy.

The 'Notes' to Table 1 in the Plan make clear that the site capacities are '*approximate*' and that detailed design proposals may lead to greater numbers of dwellings than the indicative capacities would suggest. RPS notes this acknowledgement.

General considerations regarding WIN1

In relation to Winchcombe RSC, RPS particularly notes the inclusion of the site described as '*Land Off Delavale Road/Orchard Road, Winchcombe*' for 80 dwellings, along with the relevant site-specific policy (WIN1). RPS supports, in principle, the proposed allocation of this site in the Plan. The delivery of this site will assist in both meeting the housing needs (and shortfall) of the Borough, as well as promoting sustainable development in a location where it will enhance or maintain the vitality of rural communities, thus promoting opportunities for the settlement to grow and thrive in accordance with national planning policy for rural areas (NPPF 2019, paragraph 78).

In that sense, the Plan is consistent with national policy and the proposed allocation is soundly-based in principle. However, RPS has a number of concerns regarding the aspects of the overall approach to the site and the criteria in Policy WIN1, which are set out below.

Firstly, RPS does not support the indicative capacity of 80 dwellings as proposed on the site (stated in Table 1 of the Plan). RPS consider that the site could accommodate more development than that suggested in the indicative capacity, whilst ensuring that any new built development would be confined to the 115m contour line. Even after taking into the rural location and need to respond to local character and context, the provision of 80 units would represent only 11.6 dwellings per hectare (against a site area of 6.9ha). In our view, this is not an effective use of land and a higher density development is possible without undermining the characteristics of the site or surrounding area. This is based on preliminary work carried out by the site promoter and would form the basis for future discussions with the Council on a detailed design and layout. In our view, the most appropriate solution to facilitate a development that can properly address these matters is through an adjustment to the site allocation boundary to include the full extent of the site consistent with the submission to the Council's Assessment of Land Availability (ALA) (under reference WIN017). RPS submits, on behalf of the site promoter, an indicative layout that clearly demonstrates the potential to accommodate additional development on the site, up to 127 dwellings. This capacity would accord with the level of growth consulted on at the preferred options stage totalling 120 dwellings (albeit across a slightly larger site area based on two parcels – A and B). Furthermore, the Council's own evidence base indicates that a higher capacity can be accommodated on the site. For example, the Assessment of Land Availability Report (2016/17), at Table 2 and 3, indicated a potential for 132 dwellings on the site (site ref. WIN010), which would represent 19 dwelling per hectare. The updated ALA report for 2018/19 (at Table 7 and 8) dated August 2019 increases the indicative capacity for the site to 152 dwellings (site ref. WIN017), now representing a density of 22 dwelling per hectare.

Based on the foregoing analysis, it is not clear as to the justification for such a drastic reduction in the indicative site capacity for the site under Policy WIN1 (which effectively amounts to a capacity that is nearly 50% lower than indicated in the latest ALA 2018/19 report).

Comments on Site-specific criteria proposed for WIN1

Secondly, and related to the first point, the Plan (under Policy WIN1) sets out several site-specific development principles to be addressed as part of any planning application for the site. Principally, these relate to; a 'landscape-led design' limiting development to areas below the 115m contour; delivering biodiversity net gain; promoting accessibility and connectivity through the site; and, the need to address the potential flood risk concerns identified in the Strategic Flood Risk Assessment Level 2 (2018). RPS provides comments on each of these below, and in many respects these comments follow on from those submitted at the Regulation 18 stage.

Landscape criteria

In relation to these criteria, the criteria reflect in broad terms those proposed set out at the preferred options stage, with some amendments to account for the removal of the site adjacent to Land Off Delavale Road that was previously supported (defined as 'Site A'). With regards to the site-specific requirements set out in the emerging Plan, RPS consider that these can be adequately addressed as part of sensitively-designed proposals for the site (as the attached indicative layout illustrates). However, in relation to landscape issues affecting the design layout of the site, RPS objects to the requirement that all aspects of the development should be located below the 115-metre contour line. This would include, as proposed in the emerging Plan, provision of green infrastructure including open space. However, in our view this approach is not justified by the relevant evidence, principally the Winchcombe Town Landscape and Visual Sensitivity Study November 2014 Final Report (LVIS) carried out by Toby Jones Associates Ltd. The site allocation boundary for Site B, and thus a revised settlement boundary, appears to follow the 115m contour line set out in figure 4 of the LVIS. In relation to the primacy of the contour line, the LVIS states (at para 3.3) that: *"Rather than a solid development edge along [this] contour, it is suggested that the built edge would extend "no further than' the contour, thus allowing the edge to meander and accentuate the topography of the hillside."*

In our view, the proposed wording in the Plan (under Policy WIN1) is currently based on an interpretation that the 115m contour represents an absolute limit to any development beyond the 115m contour including the provision of open space, rather than in our view representing, 'the edge of built development i.e. new buildings, to allow for the softening of the settlement edge beyond'. It is our view that an appropriate 'feathered edge' could include the provision of well-designed open space and landscaping sensitive to the locality and context of the area west of Winchcombe. Such matters could be addressed at the planning application stage, though it is important to build flexibility into the allocation at this stage to be able to deal with this.

Consequently, in order achieve this, the settlement boundary should be adjusted to follow the existing landscape features provided by existing hedges and footpaths that run along the western edge of the site as shown in Appendix 4 of the Tewkesbury Borough Assessment of Land Availability 2016/17 (page 265), and Appendix B of the ALA 2018/19 Report (page 268). This would facilitate the provision of new built development along the 115m contour with the provision of open space and enhanced landscaping beyond up to the edge of the allocation, consistent with the adjusted settlement boundary. In addition, this would also create a more clearly defined and defensible settlement boundary rather than one that fails to follow clear features of the local landscape.

This (our) interpretation is consistent with a recent appeal decision in Winchcombe (APP/G1630/W/17/3171926) where the Inspector was careful to distinguish between 'built development' and 'development' in the wider sense (to include non-built uses):

"In view of the extent of agreement between the landscape assessors on both sides, I accept that the degree of harm to the landscape is correctly assessed as 'low adverse'. Built development would occupy the lower part of the slope, below the critical 115 m

contour and would avoid the more elevated western portion of the site. The development would include open space and landscape planting which would provide for a 'feathered' edge to development in contrast with the rather abrupt edge currently displayed by existing development. There would be limited impact on views from public rights of way, including the long-distance trails and identified local walks, due to the topography of the area, and the absence of public rights of way on the lower slopes of Langley Hill immediately adjacent to the site." (paragraph 24)

Green Infrastructure and biodiversity criteria

In relation to biodiversity, Policy WIN1 makes reference to contributions towards 'wider green infrastructure and deliver biodiversity net gains'. RPS wishes to object to this wording for two key reasons. Firstly, whilst national policy seeks to protect and enhance biodiversity (NPPF 2019, paragraph 174 refers) it also suggest that plans should "...identify and pursue opportunities for securing measurable net gains for biodiversity..." (paragraph 174a). Consequently, there may be circumstances where there is no opportunity to secure 'measurable' net gains. However, as currently drafted, there is an expectation that such gains will be delivered on all development as matter of policy. RPS suggest that the policy goes beyond the spirit and intentions of the NPPF and so is not soundly-based (not consistent with national policy).

Flood risk criteria

In relation to the flood risk criteria, RPS maintains the view that this site is not affected by flood risk to any great extent and therefore a specific policy criterion under Policy WIN1 is not justified. Evidence on this is set out in the SFRA Level 2 Assessment (November 2017), carried out on behalf of the Council by JBA Consulting. Table 9-2 of the report indicates that 97% of Site B (referred in the SFRA as 'Winchcombe Site 7') is located within Flood Zone 1, which denotes land at the lowest risk of flooding. In addition, the risk of surface water flooding is also considered to be low (less than 1% of a 100-year flood event) with up to 2% of the site potentially affected by a 1 in 1000-year event. The overall risk of flooding as a result of any development on the site is therefore considered to be extremely low. This is consistent with the Environment Agency 'Flood Map for Planning' for Winchcombe (an extract is included at Figure 1 of our Regulation 18 Preferred Options Document Representations) showing the site in relation to known flood risk sources (from fluvial/watercourses). The map illustrates the main source of potential flood risk being mainly located along the eastern and south-eastern boundary of Winchcombe, and at a considerable distance from the site.

Based on the foregoing analysis, RPS does not consider it justified to make explicit any policy requirement regarding flood risk under Policy WIN1 seeking to go beyond the JCS and national policy advice on dealing with flooding.

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

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

It is not clear as to the justification for the drastic reduction in the indicative site capacity for the site under Policy WIN1 compared to the Council’s own indicative capacity (which effectively amounts to a capacity that is nearly 50% lower than indicated in the latest ALA 2018/19 report). On this basis the site capacity (albeit indicative) is not soundly-based and so the Council should revised upwards the site capacity to accord with it’s own evidence base. This should also take into account the enclosed site layout submitted alongside this representation (**Appendix 1**).

To make the Policy effective, the settlement boundary should be adjusted to follow the existing landscape features provided by existing hedges and footpaths that run along the western edge of the site as shown in Appendix 4 of the Tewkesbury Borough Assessment of Land Availability 2016/17 (page 265), and Appendix B of the ALA 2018/19 Report (page 268). This boundary would then be consistent with any planning application that would clearly need to follow established features and land ownerships.

RPS does not consider it justified to make explicit any policy requirement regarding flood risk under Policy WIN1 seeking to go beyond the JCS and national policy advice on dealing with flooding, based on the available evidence. On this basis, this criteria should be deleted from Policy WIN1.

The second bullet point to Policy WIN1 should be amended to reflect national policy on biodiversity net gains, with specific reference to the ‘opportunities’ for such gains to be pursued.

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

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

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

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

	No , I do not wish to participate in hearing session(s)	x	Yes , I wish to participate in hearing session(s)
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Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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

To properly represent our client on planning matters affecting their interest in the TBP.

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

Signature:

Date:

Appendix 2 – Further suggested modifications post submission

Further suggested modification to Policy WIN1 (post submission)

<p>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</p>	<p>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></p>	<p>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 Winchcombe Town Centre</p>
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Proposed Policies Map Change

<p>Policies Map Winchcombe</p>	<p>Housing allocation boundary for Site WIN1 excludes a small area of available land on Orchard Road</p>	<p>Housing allocation boundary for Site WIN1 amended to include a small area of available land on Orchard Road</p>	<p>Statement of common ground with Mrs and Mrs Pursey identifies that a small part of their available land has been excluded from the allocation</p>
<p><u>Policies Map Winchcombe</u></p>	<p><u>Housing allocation boundary for Site WIN1 includes two small areas of land to the west of the site that are not intended to form part of the allocation. The allocation boundary does not include land associated with the proposed vehicular access to Delavale Road.</u></p>	<p><u>Allocation boundary to be redrawn to exclude small areas of overlap with adjoining field parcels, reflective of the 115m contour line, and to show the principal access point to the site in the north east corner from Delavale Road. This involves the demolition of a frontage property on Delavale Road within BHA's control and parties agree that for completeness, the red-line boundary should include this land.</u></p>	<p><u>Change required to accurately show the extent of the allocation boundary and vehicular access opportunities.</u></p>

Appendix 2 – Further suggested modifications post submission

