



The countryside charity
Gloucestershire

24 January 2021

Tewkesbury Borough Plan Examination

Response to Matters, Issues and Questions

By the Campaign to Protect Rural England, Gloucestershire

Introduction

CPRE Gloucestershire welcomes the opportunity to address the questions set by the Inspector and thereby supplement its earlier representations. In the interests of brevity we have confined our response to those questions which we consider most relevant and urgent, and do not repeat the representations already submitted; instead, cross references are made. As requested, we set out below our comments under the individual 'Matters' specified by the Inspector, with each Matter beginning on a separate page. However, many of what we regard as the crucial issues are inter-related, and all our representations, like local plans, should be read as whole.

Conclusion

Consideration of the most relevant and urgent questions alone, as set out below lead CPRE to conclude that the Tewkesbury Borough Plan is unsound.

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

Question 1.1

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?

CPRE disagrees with the proposition *“which met the duty to co-operate”*. The JCS set a total housing requirement for the area but left unanswered important questions about its distribution and means of provision. Paragraph 3.2.16 refers. To take an historical perspective, the JCS was begun on the basis that the needs of the County’s two main towns could no longer be wholly met within their administrative areas. The basic principle nevertheless appears to have been to accommodate as much of that need within those boundaries in order to keep to a reasonable minimum the number of dwellings which would need to be allocated in Tewkesbury Borough generally and in the Green Belt in particular. However, it became apparent long before Gloucester City Council made any significant progress on its own plan (now also submitted for Examination) that the capacity of the City to accommodate new housing had been overestimated. This was belatedly acknowledged in the Gloucester City Plan Submission Draft at paragraph 4.12: *“Gloucester City has a shortfall of sites to provide for identified housing needs from 2028 to 2031; this amounts to 900 dwellings. This shortfall is acknowledged and accepted within the JCS. Policy REV01 ‘Gloucester and Tewkesbury Housing Supply Review’ states the need for an immediate review of housing supply and that ‘The review will cover the allocation of sites to help meet any shortfall in housing supply against the JCS housing requirements for the respective authorities”*.

There was in our view a fundamental failing of the duty to co-operate at that stage, and the paragraph quoted is of no help in suggesting a way forward. Local plans normally identify sufficient land to meet housing requirements for the whole plan period, and it is especially important to do so in a constrained urban area like Gloucester where there is no certainty that further opportunities will be found to meet any shortfall. In other words, the housing requirement for Gloucester (insofar as we can tell what it actually is, as a result of the inappropriate way of presenting the figures in both the JCS and the Gloucester City Plan) was set too high in the first place. The situation remains unresolved as far as we can ascertain.

The TBP excludes the strategic allocations made in the JCS in the Borough. Their extent will have been determined by a consideration of the land needed to accommodate not just an amount of new housing but also to make provision for other land uses including employment. It is also likely to have been based on the

efficient rather than profligate use of land, which means that it is most unlikely that significant scope exists for increasing residential densities in order to accommodate any shortfall arising in Gloucester. This shifts attention towards the safeguarded land. However, this is also covered by the JCS rather than the TBP.

We conclude that the shortfall of land for housing to meet requirements in Gloucester City is a strategic matter which affects both Gloucester City and Tewkesbury Borough Councils. It does not in our view include Cheltenham Borough Council as the Cheltenham Local Plan has been adopted and takes account of all identifiable opportunities for housing provision.