

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.

Matter 3A: Allocations outside the Green Belt

Question

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?

TBC response

3.1.1 The JCS authorities held an 'Issues and Options' consultation from October 2018 to January 2019. As part of this consultation a concept masterplan for the Ashchurch area was also consulted upon. This is detailed below. Subsequently, in March 2019 the Council were successful in their bid to become part of the government's Garden Communities programme. The bid set out the principle of exploring the potential to deliver approximately 10,000 homes and 120 hectares of employment land. This will all form part of the review of the JCS.

3.1 Concept masterplan

This diagram shows the complete Concept Masterplan.

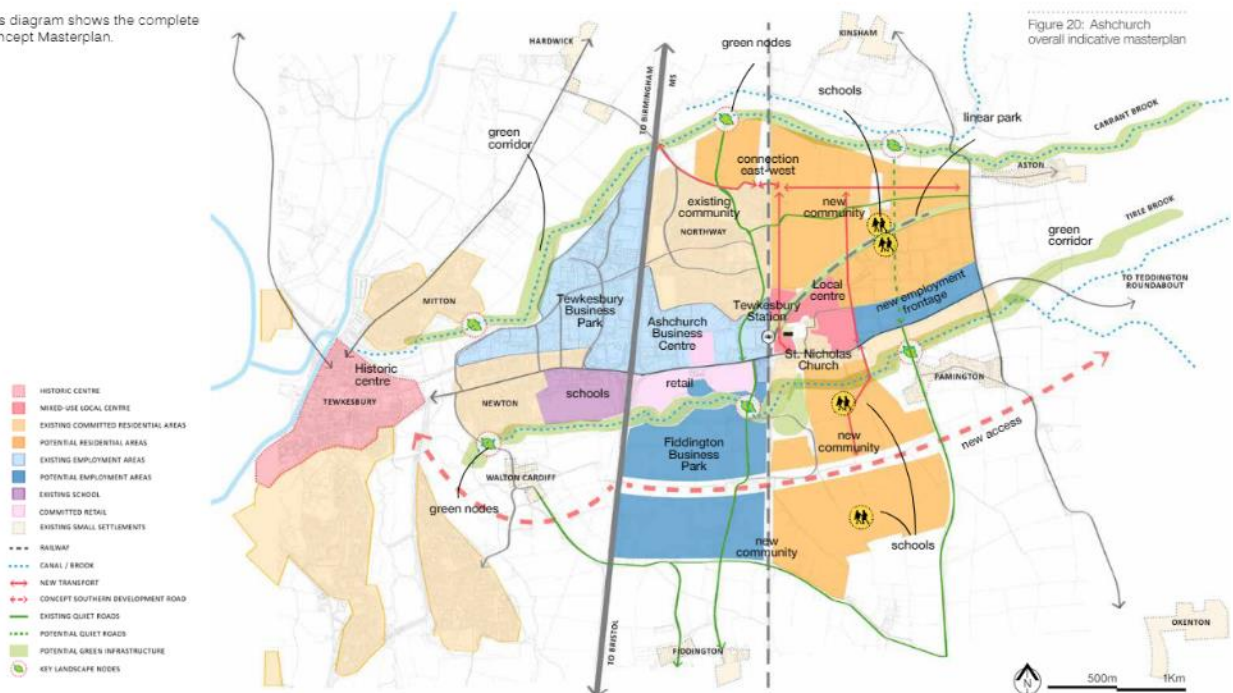


Figure 20: Ashchurch overall indicative masterplan

Question

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?

TBC Response

3.2.1 The following settlements have made Neighbourhood Plans:

- DP004a - Alderton adopted neighbourhood plan (July 2018)
- DP004b - Down Hatherley, Norton and Twigworth Adopted Neighbourhood Plan (May 2018)
- DP004c - Gotherington adopted neighbourhood plan (September 2017)
- DP004d - Highnam adopted neighbourhood plan (January 2017)
- DP004e - Twyning adopted neighbourhood plan (January 2018)
- DP004f - Winchcombe and Sudeley adopted neighbourhood plan (January 2017)
- DP005g - Churchdown and Innsworth adopted neighbourhood Plan (June 2020)

3.2.2 The following communities have designated Neighbourhood Areas and are engaged in varying stages of neighbourhood planning:

- Ashchurch Rural Parish Council
- Bishops Cleeve Parish Council
- Deerhurst Parish Council
- Highnam Parish Council - review of made NDP
- Northway Parish Council
- Stoke Orchard and Tredington Parish Council
- The Leigh Parish Council
- Tewkesbury Town Council
- Woodmancote Parish Council

3.2.3 The following allocations have been made within Neighbourhood Plans:

- Gotherington –

The two following sites are included as allocations within the TBP:

- GNDP02/1 – Land to the north of Malleson Road (0.95 hectares). This site is suitable for a small frontage development of about six units.

Development only along the frontage will maintain the linear form of the village. – included as an allocation in the TBP

- GNDP02/3 – Land to the north of Gretton Road (1.22 hectares) – included as an allocation in the TBP.

The below site is additional to the Tewkesbury Borough Plan:

- GNDP02/2 - Land to the south of Malleson Road (3.74 hectares). About 50 dwellings. – additional to the TBP.

- Twynning –

The below two sites are additional to the Tewkesbury Borough Plan:

- Site A – Land adjacent to caravan park. Indicative capacity: 22 dwellings. – additional to the TBP.
- Site B – Land South of Brockeridge Road. Indicative capacity: 58 dwellings. – additional to the TBP.

3.2.4 The following adopted Neighbourhood Plans have designated Settlement boundaries and are consistent with the settlement boundaries defined within the Tewkesbury Borough Plan.

- Norton
- Gothington
- Twynning
- Winchcombe

3.2.5 Twigworth has designated a settlement boundary within it's NDP but is not included within the Tewkesbury Borough Plan as it does not intend to allocate any housing at Twigworth. However, Twigworth NDP acknowledges Twigworth village has not previously had a defined settlement boundary for planning purposes, as no growth had been planned in the village. However, in the new planning era, some modest growth is likely, although the precise scale of that growth is still to be determined. There is a small existing portfolio of extant permissions or commitments to contribute to planned growth. Rather than define a settlement boundary to contain all new development, this NDP defines a settlement boundary around the area of highest density, near the village shop and away from areas recognised as at risk of flooding or exceeding field capacity. This is intended to focus the assessment of future growth proposals to this area of Twigworth. Whilst some development can be accommodated within it, it is likely that some growth will be required alongside these boundaries.

Question

3.3 Considering each Policy RES1 site in turn –

Question

3.3.1 *What is the current use of the site and is there any relevant planning history? Are there any current planning applications or appeals?*

TBC Response

[TABLE 3.1]

Site	Current Use	Planning History	Current Applications or Appeals
TEW1 - Land at Odessa Farm	Agricultural	89/92212/OUT Outline application for residential development including provision of a relief road, school, public open space & footpath network. – permit.	No current application
TEW2 - Land adjacent to John Moore Primary School, Wheatpieces	Was Agricultural / Greenfield but development commenced on 6 th May 2020	An outline planning application for residential development including the provision of a link road, primary school, public open space, and footpath network was approved in October 1994 (Ref: 89/92212/OUT). This planning application covered the land in question and to the west of the site.	Outline planning application for up to 30 dwellings with affordable housing, access, plus associated works for landscaping, drainage and provision of public open space granted 31.05.2019 Reserved Matters application granted 17.09.2019. Development Commenced 06.05.2020.
TEW3 - Spring Gardens	Highways, surface car parking and site of former Leisure Centre	14/00876/FUL Erection of Retirement Living Housing for the elderly (category II type accommodation), including communal facilities, landscaping, and car parking. - Refused 94/00811/LA3 Creation of pay and display car park on existing paved surface – permit. 92/10316/OUT Demolition of existing buildings and proposed construction of 41 flats with garaging/parking – permit. 16/00356/DEM - Demolition of swimming pool and health building – demolished.	19/00128/FUL Oldbury Car Park Oldbury Road Tewkesbury Gloucestershire Change of use to mixed use as a public car park and for a weekly open-air retail market (Wednesday & Saturday). – awaiting decision

TEW4 - Healings Mill	Disused Mill	<p>11/01021/FUL Proposed temporary removal and rebuilding of section of building at 5th floor level of the building for removal of machinery. – permit.</p> <p>14/00650/FUL Demolition of: Garage; Vehicle Wash; Weigh Bridge; Warehouse; Pallet Storage Area; Wheat Intake no 1 & no 2; 'D' Silos; Boiler House; Silos – permit.</p> <p>11/01021/FUL Proposed temporary removal and rebuilding of section of building at 5th floor level of the building for removal of machinery. - permit</p>	No current application.
BIS1 – Land adjacent Breaker’s Yard	Agricultural	<p>14/01233/FUL Proposal for 26 dwellings (Use Class C3), together with associated landscaping, open space, access, and infrastructure. – permit.</p> <p>14/00481/APP Reserved Matters application in respect of Phase 1B of outline planning permission (10/01005/OUT) for 22 dwellings (use class C3), 448 sqm of Use Class A floorspace, 500 sqm of Use Class B1 floorspace, strategic parkland, POS facilities and ancillary landscaping, vehicular access and provision of foul, surface water and infrastructure . – approved.</p> <p>10/01005/OUT Outline application for up to 450 dwellings (use class C3), provision of a local centre comprising 450 SQ.M (total gross internal floor area) of use classes A1, A2, A3, A4 and A5, 500 SQ.M (total gross internal area) of use class B1, A, B, C accommodation, 350 SQ.M (gross internal floor area) of community hall (use class D1), 700 SQ.M (total gross internal floor area) health, leisure and nursery accommodation (use D1 and D2), strategic parkland (including allotments and orchards) POS facilities and ancillary landscaping, vehicular access and provision of foul, surface water and infrastructure. – permit.</p>	No current application
BIS2 – Land at Homelands Farm	Agricultural	<p>19/00758/OUT - Hybrid planning application, seeking; 1. Full planning permission for 65 residential units (to include affordable housing, public open space, associated highways and drainage infrastructure); and, 2. Outline planning permission, with all matters reserved except access, for up to 2,000 sqm (GIA) small scale employment use (B1 use class) and associated demolition, parking and open space. – permit.</p>	No current application
BIS3 – Land at allotments off A435	Allotments	None relevant	20/00245/FUL Detailed planning application for the erection of 103 dwellings,

			provision of access, diversion of public right of way, drainage, public open space, landscaping, and ancillary works. – awaiting decision.
WIN1 – Land off Delavale Road/Orchard Road	Agricultural	None relevant	No current application
COO1 – Land at junction of A38/A4019	Agricultural	There was a resolution to grant application 17/01337/OUT for up to 40 dwellings on 18 June 2019 which has not yet been granted due to issues in respect of section 106 obligations (in particular in respect of education).	There is current appeal against non-determination of planning application reference 20/00140/OUT for up to 150 dwellings (PINS Reference: APP/G1630/W/20/3257625) is due to be heard by inquiry in March 2021. The Council’s resolution on 17 November 2020 was that it would have been minded to refuse this application in respect of issues in respect of scale, character, design approach, integrity of the SPA, provision of open space, recreational pressures, flooding and section 106 obligations.

COO2 – Land adjacent to the Swan PH	Agricultural 'Vineyard'	18/00173/FUL Residential development comprising 25 no. dwellings, with new vehicular/pedestrian access onto A38, relocation of bus stop, sustainable drainage and Foul Treatment Works and associated landscaping, access, and parking. – permit.	Resolution to grant permission for 40 dwellings.
GOT1 – Land to the north of Malleston Road	Agricultural	19/00476/FUL Erection of 9 residential dwellings and associated vehicular access. – permit.	No current application.
GOT2 – Land to the north of Gretton Road	Agricultural	17/00922/APP Application for the approval of reserved matters (Access, Appearance, Landscaping and Scale) pursuant to outline planning permission no.16/00336/OUT for the erection of up to 10 dwellings – permit. 19/00422/APP Approval of Reserved Matters (Access, Scale, Appearance, Landscaping) pursuant to Outline Planning Permission reference: 16/00336/OUT – approve.	No current application.
MAI1 – Land at Bell House Farm	Brownfield	17/00514/OUT Outline application for residential development of 60 units with all matters reserved for future consideration. – refuse. 14/00965/FUL Demolition of existing curtilage listed outbuildings and proposed residential development comprising of 15 dwellings and associated landscaping, parking and garaging (Revised scheme further to Ref: - 14/00089/FUL) – permit. Conditions have been discharged and work has started on site	19/00676/OUT Outline application for the erection of up to 33 residential units (50% affordable provision) with associated infrastructure and landscaping (all matters reserved for future consideration). – awaiting decision.
SHU1 - Land at corner of Badgeworth Lane and A46	Agricultural	None relevant.	No current application.
SHU2 - Land north of	Agricultural	Various applications made for residential development throughout the late 70s to 90s. Most recent being 91/95092/OUT	No current application.

Leckhampton Lane		Outline application for residential development. New access. – refused.	
SHU3 - Garage site at Harrison	Brownfield	None relevant.	No current application.
TOD1 – Land adjacent to Pheasant Public House	Agricultural	14/00915/OUT Outline planning application for the erection of up to 25 dwellings and associated works with all matters reserved for future consideration with the exception of access. – appeal dismissed.	No current application.
WOO1 – Land adjacent to Oxbutts Caravan Park	Agricultural	99/00357/FUL Change of use of part of existing site from touring caravans to mobile residential homes. Change of use of land to provide extension to existing mobile home site. – refuse.	No current application.
FOR1 – Land at corner of Bishops Walk and School Lane	Agricultural	None relevant.	No current application.
BRO1 – Land adjacent to Hucclecote Road and Golf Club Lane	Airfield 1912 to 1964 Gloucester Trading Estate commenced on 11 th January 2021	18/01239/FUL Erection of 166 new homes including 40% affordable housing provision, 163 sq meters of flexible commercial/community uses (A1,A2,A3,A4,A5,B1 and D1) public open space and associated infrastructure. – permit.	No current application.
BRO2 – Nerva Meadows, Gloucester Business Park	mix of commercial and residential	None relevant.	15/01378/OUT Development of up to 106 dwellings. – awaiting decision.

Question

3.3.2 *If planning permission has already been granted or if there is 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?*

TBC Response

3.3.2.1 At the point of adoption of the plan, identifying all permitted, commenced and completed developments from the beginning of the plan period, in this case 2011, as committed; and all other proposals as allocations. This is recommended as a main modification.

Question

3.3.3 *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?*

TBC Response

3.3.3.1 The site assessment process is set out in the Pre-Submission Tewkesbury Borough Plan Housing Background Paper, October 2019 ([EB013](#)) and the results included as appendices to that report.

3.3.3.2 The methodology for identifying sites is based on Policy SP2 of the JCS ([DP001](#)) 'Distribution of New Development' and the presumption in favour of sustainable development set out in the NPPF.

3.3.3.3 Policy SP2(8) states that any additional site allocations made through a local plan or any neighbourhood plans must be in conformity with the spatial strategy in this policy.

3.3.3.4 Policy SP2 (5) provides the Rural Service Centre and Service Village site assessment framework. It states that they will accommodate lower levels of development allocated through the Tewkesbury Borough Plan and Neighbourhood Plans. Such allocations must be:

- Proportional to their size and function;
- Reflect their proximity and accessibility to Cheltenham and Gloucester; and
- Take into account the environmental, economic and social impacts, including existing levels of growth over the plan period.

3.3.3.5 The disaggregation process, set out in Appendix D of the Housing Background Paper ([EB013](#)), provides an indicative housing requirement for each settlement based on these criteria which gives an idea of the general levels of development that could be sustainably accommodated at each settlement.

3.3.3.6 Once the indicative requirement for each of the Rural Service Centres and Service Villages was established work was undertaken to identify available sites that are located adjacent to them. Both the Council's Assessment of Land Availability (ALA) (EB015) and Council owned land that is available for development were considered alongside sites with a pending or determined planning application and sites promoted through the Preferred Options consultation that took place between 10th October and 30th November 2018. Each site was then considered against the following criteria derived from the JCS spatial strategy, national planning policy guidance and relevant local policy constraints:

- **Strategy** – Is the site located within the required settlement category in JCS Policy SP2s spatial hierarchy?
- **Internationally or nationally designated environmental designations** - Is the site affected by internationally or nationally designated environmental constraints (AONB, designated heritage assets, flood zone 2 or 3, internationally/nationally designated nature conservation sites (i.e. SAC, SSSI) which make development unacceptable?
- **Policy constraints** - Is the site in an area designated as Green Belt, Protected Open Space, Local Green Space, or is it a playing field?
- **Local policy constraints** - Is the site designated as having special interest at a local level (e.g. Conservation Area, Special Landscape Area or a Local Wildlife Site)?
- **Suitability** - Will the development of the site result in unacceptable impacts on other land uses, or be an 'incompatible land use' with neighbouring operations (e.g. a sewage treatment works). Are there any other factors, which might affect the suitability of the site for development? Or are the impacts capable of mitigation?

3.3.3.7 Further evidence was then gathered for those sites which were considered to have development potential, (i.e. a partial Green Belt review, Strategic Flood Risk Assessment, landscape studies) and site visits were carried out with specialist officers from the Council (including urban design, landscape and conservation officers). Sites were then re-appraised to take into account technical evidence, observations on site and any comments/concerns raised by specialist officers.

- 3.3.3.8 Finally consideration was given to whether it was appropriate to promote further growth at the respective settlements, for example due to the cumulative effect of previous commitments and/or the presence of a 'made' Neighbourhood Development Plan or if national planning policy indicated that the sites should not be allocated, such as sites in the Green Belt where exceptional circumstances are not demonstrated.
- 3.3.3.9 The housing site allocations in the Pre-submission TBP are the result of this methodology and a further iterative process: Following the (Regulation 18) preferred options consultation a number of additional sites had been identified as available for development and had been demonstrated to be developable and deliverable through the planning application process; the Council also received submissions on behalf of developers and commissioned feasibility studies in respect of certain sites that were previously dismissed due to uncertainties over their deliverability; therefore all of these additional sites were considered for inclusion in the Pre-submission TBP using the site assessment process explained above.

[TABLE 3.2]

Site	TBC Response
TEW1 - Land at Odessa Farm	<p>Site Selection Criteria - Yes as one of the Tewkesbury Town allocations this site is consistent with JCS Policy SP2. There are national and local designations affecting the eastern and north eastern parts of the site (Flood Zones 2 and 3 and Tewkesbury Conservation Area) but the majority of it falls outside of these designations. The site is justified as a modest extension of the town as a result of the constraints identified below.</p> <p>Constraints – The site sits in Flood Zones 1, 2 & 3. To address comments received from the Environment Agency during pre-submission consultation a suggested modification has been included in the Schedule of Changes (CD011) in relation to Policy TEW1 as they advised that all built development must be located in Flood Zone 1 taking into account appropriate, locally specific allowances for climate change. Landscape sensitivity - The Landscape Sensitivity Study for Tewkesbury and Ashchurch, April 2017 (EB018) assesses the site as part of parcel TE14. Whilst this finds the landscape sensitivity of the parcel to be ‘medium/high’, this is based on a much larger parcel extending from the south of Tewkesbury to the village of Tredington. The landscape study considers that, subject to appropriate design/layout/landscaping, the parcel could accommodate some medium scale development as an extension to the existing settlement edge.</p> <p>Infrastructure Required – Master-planning reported in the Statement of Common Ground (SOCG8) as underway will identify infrastructure requirements for Flood Mitigation, Access by all modes, Education and the full range of Community Infrastructure.</p> <p>Potential Impacts - Encroachment into the open countryside: The Landscape Sensitivity Study (EB018) finds the landscape sensitivity of the parcel to be Medium / high and recommends that restraint would be required to avoid the perception of intrusion into open countryside and the creation of a conspicuous and uncharacteristic settlement form.</p> <p>Deliverable within 5 years or the Plan Period - Statement of Common Ground (SOCG8) has been prepared to demonstrate that whilst there is still some disagreement about the indicative size of the allocation, the landowner promoting a larger site, it is agreed that the allocation is deliverable within 5 years of adoption of the plan.</p>
TEW2 - Land adjacent to John Moore Primary School, Wheatpieces	<p>Site Selection Criteria - Yes as one of the Tewkesbury Town allocations this site, which gained planning permission on the 17 September 2019 and Commenced Development on the 06 May 2020, sits high in terms of consistency with the JCS Policy SP2 strategy, is being delivered and has proved viable against constraints and infrastructure requirements.</p> <p>Constraints – No environmental, landscape and policy constraints and the site sits within Flood Zone 1.</p>

	<p>Infrastructure Required – Site benefited from planning permission granted on adjacent site (17/00347/FUL) for 261 dwellings including the construction of a new link road south of John Moore Primary School, including landscaping and drainage works in February 2017.</p> <p>Potential Impacts – The Sustainability Appraisal of the pre-submission Tewkesbury Borough Plan (CD006) concludes that the site will have a minor positive impact.</p> <p>Deliverable within 5 years or the Plan Period - Statement of Common Ground (SOCG12) is simply an update from Bloor Homes that the full allocation will be delivered this year, in 2021.</p>
TEW3 - Spring Gardens	<p>Site Selection Criteria - Yes as two of Tewkesbury Town allocations these sites are consistent with JCS Policy SP2 and offer significant regeneration benefits.</p> <p>Constraints – A small part of Site TEW3 is within Tewkesbury’s Conservation Area and within the setting of a number of Grade II Listed Buildings. Site TEW4 has identified flooding and ecological constraints and Healings Mill is also constrained by the listing of the Mill itself. The Council believe that with the support of the Tewkesbury Town Regeneration Supplementary Planning Document (DP005) and site-specific policy requirements a minor positive impact may be achieved on these constraints.</p> <p>Infrastructure Required – The Council have been successful in their bid for High Street Heritage Action Zone funding to help unlock the development potential of the Healings Mill site.</p> <p>Potential Impacts – The Sustainability Appraisal of the pre-submission Tewkesbury Borough Plan (CD006) concludes that policy requirements for prioritising conservation, addressing flood risk and contributing to enhancements in Green Infrastructure will lead to minor positive and positive impacts.</p> <p>Deliverable within 5 years or the Plan Period – The Assessment of Land Availability, August 2019 (EB015a) identifies both TEW3 - Spring Gardens and TEW4 - Healings Mill as deliverable within 6 to 10 years (Table 7).</p>
TEW4 - Healings Mill	
BIS1 – Land adjacent Breaker’s Yard	<p>Site Selection Criteria - Yes as all 3 sites sit within Bishop’s Cleeve, one of two settlements (along with Winchcombe) within the borough defined as Rural Service Centres they are consistent with JCS Policy SP2.</p> <p>Constraints – For BIS1, no environmental, landscape and policy constraints were identified; for BIS2, the loss of the best and most versatile agricultural land; and for BIS3, Flooding.</p> <p>Infrastructure Required – For all three sites, green infrastructure is required to maintain and enhance ecological networks and achieve the required net gain in biodiversity; For BIS2 and BIS3, pedestrian and cycle connectivity with Gotherington Lane (BIS2) and the adjacent development to the south and east (BIS3). Currently insufficient primary</p>
BIS2 – Land at Homelands Farm	
BIS3 – Land at allotments off A435	

	<p>school provision available to meet the needs of local residents. A new school is required at the settlement to meet the future demand for places from the developments. Gloucestershire County Council (GCC) have recently resolved to approve the establishment of a new 3FE Primary School to serve Bishop’s Cleeve. A statement of common ground between GCC and TBC is being produced on this matter.</p> <p>Potential Impacts – Accessibility, in particular by modes other than the private car, surprisingly didn’t support completely positive impacts in the Sustainability Appraisal of the pre-submission Tewkesbury Borough Plan (CD006) for all of the sites in Bishop’s Cleeve but with the net gains secured through TBP Policy Nat1 the impact for each site was considered to be: BIS1, minor positive; BIS2, minor negative; and BIS3, positive.</p> <p>Deliverable within 5 years or the Plan Period - Statement of Common Ground (SOCG7) has been prepared to demonstrate that BIS3 – Land at allotments off A435 is deliverable within the plan period. BIS1 has full planning permission for 26 dwellings and BIS2 has a Council resolution to grant permission for 65 dwellings. Both sites are considered to be deliverable within the plan period</p>
<p>WIN1 – Land off Delavale Road/Orchard Road</p>	<p>Site Selection Criteria - Yes as this site sits within Winchcombe, one of two settlements (along with Bishops Cleeve) within the borough defined as Rural Service Centres it is consistent with JCS Policy SP2.</p> <p>Constraints – The location of the site in the AONB is justified on the basis that the site is not considered to involve ‘major development’, and the Council argue that even if it did, the need for housing for ‘local people’ set against a background of under delivery, along with the limited scope for developing outside of the AONB at Winchcombe and the potential for the site to be developed without significant harm to the AONB, constitutes the required ‘exceptional circumstances’.</p> <p>Infrastructure Required – green infrastructure is required to maintain and enhance ecological networks and achieve the required net gain in biodiversity; public transport, pedestrian and cycle connectivity is required to ensure permeability through the site and connectivity with adjacent streets.</p> <p>Potential Impacts – Care has been taken to develop policy requirements in WIN1 and SD7 that ensure that any impact on the AONB is minimised.</p> <p>Deliverable within 5 years or the Plan Period - The Assessment of Land Availability, August 2019 (EB015a) identifies WIN1 – Land off Delavale Road / Orchard Road as deliverable within 5 years (Table 7). A statement of common ground is being produced between the Council and the main site promoter which is to include more specific information on the site’s deliverability.</p>
<p>COO1 – Land at junction of A38/A4019</p>	<p>Site Selection Criteria - Yes as both of these sites sit within Combe Hill defined as a Service Village they are consistent with JCS Policy SP2.</p>

<p>COO2 – Land adjacent to the Swan PH</p>	<p>Constraints – The Sustainability Appraisal of the pre-submission Tewkesbury Borough Plan (CD006) found minor negative effects for access and sustainable transport SA Nos 3 and 4 respectively for both sites as well as for landscape, which are being addressed through the site specific policy for the larger site.</p> <p>Infrastructure Required – Public Open Space, contribution to Green Infrastructure in addition to contributions to mitigate against increased recreational pressures on the Coombe Hill Canal SSSI and facilitate the development. COO1 requires measures to provide enhanced pedestrian connectivity to be provided with COO2 and the services and public transport facilities within the village</p> <p>Potential Impacts – The Sustainability Appraisal of the pre-submission Tewkesbury Borough Plan (CD006) concludes that policy requirements for place making such as requiring active street frontages, accessible public open space, enhanced accessibility on foot, the potential for a landmark building providing focus and enhancements to green infrastructure, much of which will be provided by the larger site, COO1, will lead to minor positive and neutral impacts.</p> <p>Deliverable within 5 years or the Plan Period - COO2 gained planning permission 18/0017/FUL for 25 dwellings on 15 January 2021. For COO1, the site is activity being promoted. There was a resolution to grant application 17/01337/OUT for up to 40 dwellings on 18 June 2019 which has not yet been granted due to issues in respect of section 106 obligations (in particular in respect of education). The current appeal against non-determination of planning application reference 20/00140/OUT for up to 150 dwellings (PINS Reference: APP/G1630/W/20/3257625) is due to be heard by inquiry in March 2021.</p>
<p>GOT1 – Land to the north of Malleson Road</p>	<p>Site Selection Criteria - Yes as both of these sites sit within Gotherington defined as a Service Village they are consistent with JCS Policy SP2. GOT1 is an allocation in the made Gotherington Neighbourhood Plan (DP004c) Policy GNDP02/1 as is GOT2 Policy GNDP02/3.</p> <p>Constraints – For GOT1 the Neighbourhood Plan states ‘The site is suitable for a small frontage development of about 6 units. Development only along the frontage will maintain the linear form of the village.’ GOT2 is located within a designated Special Landscape Area and within the setting of the AONB and as a result has a medium landscape sensitivity with a high visual sensitivity identified in the Sustainability Appraisal of the pre-submission Tewkesbury Borough Plan (CD006).</p> <p>Infrastructure Required – No site specific infrastructure requirements identified.</p> <p>Potential Impacts – GOT1’s impacts were identified in the Sustainability Appraisal of the pre-submission Tewkesbury Borough Plan (CD006) as mostly neutral, for example for biodiversity, with minor negative for landscape to be mitigated by the requirements on TBP Policy NAT1 and a reduction from the 10 dwellings tested to the 6 indicated respectively.</p>
<p>GOT2 – Land to the north of Gretton Road</p>	

	<p>GOT2's impact was also improved from minor negative for landscape mainly due to a reduction from the 24 dwellings tested to 10 indicated.</p> <p>Deliverable within 5 years or the Plan Period – GOT1 gained planning permission 19/00476/FUL for 9 dwellings on the 18.02.2020 and commenced development on the 23.06.2020. A Statement of Common Ground (SOCG9) has also been prepared to demonstrate that GOT1 is deliverable. 2 – GOT2 'Land to the north of Gretton Road' also has full permission for 10 dwellings (16/00336/OUT and 19/00422/APP and is deliverable within the plan period.</p>
MAI1 – Land at Bell House Farm	<p>Site Selection Criteria - Yes as this site sits within Maisemore defined as a Service Village it is consistent with JCS Policy SP2.</p> <p>Constraints – No environmental, landscape and policy constraints identified.</p> <p>Infrastructure Required – No site specific infrastructure requirements identified.</p> <p>Potential Impacts – Though the re-use of a brownfield site will be a positive impact accessibility, in particular by modes other than the private car, resulted in mostly neutral impacts in the Sustainability Appraisal of the pre-submission Tewkesbury Borough Plan (CD006) but with the net gains secured through TBP Policy Nat1 the impact was considered to be minor positive.</p> <p>Deliverable within 5 years or the Plan Period - Full planning permission was granted for 15 dwellings on 19.10.15 (ref. 14/00965/FUL) and the site is currently in the process of being built out. Conditions have been discharged and work has started on site. It is therefore deliverable. Yes, as an available unconstrained Greenfield Site we are confident that the site is deliverable within 5 years.</p>
SHU1 - Land at corner of Badgeworth Lane and A46	<p>Site Selection Criteria - Yes as all 3 sites sit within Shurdington defined as a Service Village they are consistent with JCS Policy SP2.</p> <p>Constraints – In addition to the constraints associated with the Green Belt and setting of the AONB proximate location, addressed in Appendix 1 of the Part 2 (Partial) Green Belt Review (LUC, July 2017) (EB004) and Tewkesbury Borough Plan – Assessment of Site Allocation Impacts on the Cotswold AONB (Toby Jones Associates, April 2019) (EB021) respectively, there are highways constraints for SHU1 with a lack of adequate and safe two-way traffic movements due to parent parking for Shurdington Primary School on Badgeworth Lane and for all sites increased recreational pressures on the Cotswold Beechwoods Special Area of Conservation.</p> <p>Infrastructure Required – Off-highway spaces or other parking arrangements for parents at the Primary School (SHU1), contribution to Green Infrastructure for SHU1 and SHU2.</p> <p>Potential Impacts – Potential beneficial impact with mitigation, there are neutral residual impacts on the highway network for SHU1, minor positive impacts on biodiversity for all sites. Neutral landscape impacts for SHU1 and SHU2</p>
SHU2 - Land north of Leckhampton Lane	
SHU3 - Garage site at Harrison	

	<p>and minor positive landscape impacts for SHU3. and therefore, the Journey to School for children attending the primary school who will also benefit from new walking routes from this and the adjacent development.</p> <p>Deliverable within 5 years or the Plan Period – A Statement of Common Ground (SOCG10) has been prepared to demonstrate that SHU1 - Land at corner of Badgeworth Lane and A46 is deliverable within the plan period. A Statement of Common Ground (SOCG11) has also been prepared to demonstrate that SHU2 - Land north of Leckhampton Lane is deliverable within the plan period.</p>
<p>TOD1 – Land adjacent to Pheasant Public House</p>	<p>Site Selection Criteria – Yes as this site in Newtown sits within Toddington which including Newtown is defined as a Service Village it is consistent with JCS Policy SP2.</p> <p>Constraints – There is specific constraint (mains gas pipeline in the vicinity of the site) and the Sustainability Appraisal of the pre-submission Tewkesbury Borough Plan (CD006) identifies that the though qualifying under JCS Policy SD2 as a Service Village, Toddington including Newtown lacks a full range of services and facilities including educational facilities and health care services. The site is located within a designated Special Landscape Area and within the setting of the AONB with a medium landscape sensitivity impact and low visual sensitivity impact.</p> <p>Infrastructure Required – Green Infrastructure is required as the site specific policy states that, ‘comprehensive new tree and hedge planting should be provided throughout the interior of the site.’</p> <p>Potential Impacts – Though in a Special Landscape Area and within the setting of the AONB site specific policy requirements to mitigate the identified impact on landscape, the net gains secured through TBP Policy Nat1 and contributing to enhancements in Green Infrastructure will ensure the impact is at least neutral.</p> <p>Deliverable within 5 years or the Plan Period – A Statement of Common Ground (SOCG13) has been prepared to demonstrate that the allocation is deliverable within the plan period.</p>
<p>WOO1 – Land adjacent to Oxbutts Caravan Park</p>	<p>Site Selection Criteria – Yes as this site sits within Woodmancote defined as a Service Village it is consistent with JCS Policy SP2.</p> <p>Constraints – the site sits within the setting of the AONB and is accessible only via a small rural lane or via an existing Park Home development for retired people.</p> <p>Infrastructure Required – Green Infrastructure with Tree Planting also serving as screening to reduce visual impact and mitigation measures recommended in the Tewkesbury Borough Plan – Assessment of Site Allocation Impacts on the Cotswold AONB (Toby Jones Associates, April 2019) (EB021).</p> <p>Potential Impacts – Impact on the AONB requires measures in mitigation and site specific policy access requirements will ensure that traffic isn’t made to be accommodated on inappropriate roads to access the site.</p>

	<p>Deliverable within 5 years or the Plan Period – A Statement of Common Ground (SOCCG14) has been prepared to demonstrate that the allocation is deliverable within the plan period.</p>
FOR1 – Land at corner of Bishops Walk and School Lane	<p>Site Selection Criteria – No as this site sits within Forthampton classed as one of the ‘Other Settlements’.</p> <p>Constraints – it is constrained by its location within and adjacent to a conservation area with numerous listed buildings. Site is within Landscape Protection Zone (LAN2).</p> <p>Infrastructure Required – No specific infrastructure requirements are defined.</p> <p>Potential Impacts – mitigation would be required to ensure that there is no detrimental impact on the character of the settlement, its historic environment and its rural landscape setting.</p> <p>Deliverable within 5 years or the Plan Period – The justification was originally based on Community Support for including development within Forthampton which has, through the consultation process, since been withdrawn.</p>
BRO1 – Land adjacent to Hucclecote Road and Golf Club Lane	<p>Site Selection Criteria – Yes as sites on the Urban Fringe of the City of Gloucester they are consistent with JCS Policy SP2.</p> <p>Constraints – increased accumulative recreational pressures on the Cotswold Beechwoods SAC.</p>
BRO2 – Nerva Meadows, Gloucester Business Park	<p>Infrastructure Required – No site specific infrastructure requirements are specified.</p> <p>Potential Impacts – TBP Policies NAT1 and NAT5 developed in consultation with NE to require suitable mitigation measures to reduce the impact on the SAC.</p> <p>Deliverable within 5 years or the Plan Period – A Statement of Common Ground (SOCCG6) has been prepared to demonstrate that BRO1 – Land adjacent to Hucclecote Road and Golf Club Lane is deliverable within 5 years. BRO2 has received a Council resolution to grant permission for 106 dwellings (pending completion of legal agreement).</p>

Question

3.3.4 *Is the indicative capacity figure for the allocation justified?*

TBC Response

- 3.3.4.1 The Housing Background Paper ([EB013](#)) states in Paragraph 7.1 that, “When assessing the potential capacity of sites, the land needed for the provision of infrastructure, open space and community facilities has to be taken into account. As a starting point for establishing the potential capacity of sites a density multiplier has initially been applied to achieve a net developable area based on the assumptions set out in TBC’s Assessment of Land Availability work in Table 9.” (Table 9 is at Paragraph 7.1 on Page 28). The results are illustrated in [Table 3.3](#), below.
- 3.3.4.2 Because the Assessment of Land Availability ([EB015a](#)) used a density of 30 dwellings per hectare for land outside urban areas (Table 3), which it is recognised is higher than the current density of the majority of service villages, the potential capacity of each site has been considered in consultation with the Council’s Urban Design Officer having regard to constraints identified on site and the prevailing development pattern of the area.
- 3.3.4.3 In some cases, indicative site capacities have been limited to reflect landscape evidence (TEW1 and WIN1), flooding constraints (TEW1) and ecological mitigation requirements (COO1).
- 3.3.4.4 Where a site benefits from planning permission (or a resolution to grant permission), site capacities are based on the quantum of development proposed by the respective applications. This relates to sites TEW2, BIS1, COO2, GOT2, MAI1, BRO1 and BRO2.
- 3.3.4.5 The site capacities identified in the Pre-submission Tewkesbury Borough Plan, October 2019 ([CD001](#)) are indicative only. The detailed design and planning application processes may indicate that a higher or lower quantum of development is appropriate.

[TABLE 3.3]

Site	Dwellings	Hectares	Discounted site area	Area for housing	Density
TEW1 - Land at Odessa Farm	100	10.00	3.70	6.30	16
TEW2 - Land adjacent to John Moore Primary School, Wheatpieces	30	0.90	0.15	0.75	40
TEW3* - Spring Gardens	30-100	1.30	0.22	1.08	28-93
TEW4** - Healings Mill	100	1.50	0.26	1.25	80
BIS1 – Land adjacent Breaker’s Yard	26	1.40	0.24	1.16	22
BIS2 – Land at Homelands Farm***	35	2.20	0.81	1.39	25
BIS3 – Land at allotments off A435	85	3.90	1.44	2.46	35
WIN1 – Land off Delavale Road / Orchard Road	80	6.20	2.29	3.91	20
COO1 – Land at junction of A38/A4019	50	4.90	1.81	3.09	16
COO2 – Land adjacent to the Swan PH	26	0.90	0.15	0.75	35
GOT1 – Land to the north of Malleson Road****	6	0.86	0.15	0.71	8
GOT2 – Land to the north of Gretton Road	10	1.25	0.21	1.04	10
MAI1 – Land at Bell House Farm	15	0.70	0.12	0.58	26
SHU1 - Land at corner of Badgeworth Lane and A46	50	2.20	0.37	1.83	27
SHU2 - Land north of Leckhampton Lane	20	1.20	0.20	1.00	20
SHU3 - Garage site at Harrison	15	0.57	0.10	0.47	32
TOD1 – Land adjacent to Pheasant Public House	25	1.60	0.27	1.33	19
WOO1 – Land adjacent to Oxbutts Caravan Park	60	2.30	0.85	1.45	41
FOR1 – Land at corner of Bishops Walk and School Lane	10	1.55	0.26	1.29	8
BRO1 *****– Land adjacent to Hucclecote Road and Golf Club Lane	166	3.33	1.23	2.10	79
BRO2***** – Nerva Meadows, Gloucester Business Park	106	3.30	1.22	2.08	51

A note on densities:

*TEW3 is Spring gardens so the range of 30 – 100 is as a result of the potential for the mix of uses. (Table 5, on Page 24 of the Housing Background Paper “site is to be allocated but with a capacity range (30-100) dwellings as uncertainty remains over precise mix of uses”)

**TEW4 comprises multi-storey historic mill/warehouse buildings. (Table 5, on Page 23 of the Housing Background Paper “It is estimated that the site could accommodate approximately 100 dwellings based on conversion / redevelopment of existing buildings”)

*** BIS2 has a Council resolution to permit 65 dwellings

**** GOT1 has planning permission for 9 dwellings

*****BRO1 & BRO2 are Urban fringe so would expect them to be higher but figures are taken from the planning permission (18/01239/FUL, commenced on 11th January 2021) and application (15/01378/OUT, Table 5, on Page 26 of the HBP state “Has a resolution to approve”) respectively.

Question

3.3.5 Where there is a site specific policy for the allocation, is this justified, consistent with national policy and would it be effective?

TBC Response

[TABLE 3.4]

Site	TBC Response
TEW1 - Land at Odessa Farm	<p>Is the Policy Justified – Yes the policy is justified on the grounds that it is required to ensure that the location specific issues arising from flood risk, encroachment into the countryside and impact on the landscape can be overcome or mitigated.</p> <p>Is the Policy Consistent with the NPPF – the policy is consistent with the NPPF and in particular Paragraph 155 on directing development away from areas at greatest risk of flooding, Paragraph 157 on using opportunities provided by new development to reduce the causes and impacts of flooding, Paragraph 127c) on ensuring that policies and decisions are sympathetic to landscape setting, Paragraph 170 on establishing coherent ecological networks and Paragraph 102 on identifying and pursuing opportunities to promote walking, cycling and public transport use</p> <p>Will the Policy be Effective - A Statement of Common Ground (SOCG8) has been prepared to demonstrate that with the policy requirements of building only in Flood Zone 1, exploring and implementing flood alleviation measures, delivering a biodiversity net gain, promoting cycling/walking/public transport use and satisfying the design requirement to reduce the impact on the landscape; that the site is deliverable within the plan period and can therefore be considered effective.</p>
TEW3 - Spring Gardens	<p>Is the Policy Justified – Yes because as well as providing a policy link to the Tewkesbury Town Regeneration Supplementary Planning Document (DP005) site-specific policy requirements for drainage on this regeneration site within Tewkesbury’s urban area are justified to mitigate the impact on the adjacent residential and retail areas, whilst requirements related to Green Infrastructure and net gain are justified due to the proximity to nearby Key Wildlife and SSSI sites. Mitigation is required for air quality impacts as the site is in an Air Quality Management Area (AQMA).</p> <p>Is the Policy Consistent with the NPPF – the policy is consistent with the NPPF and in particular Paragraph 117 on the effective use of land and in relation to ensuring flood risk is not increased elsewhere (Paragraph 163), establishing coherent ecological networks (Paragraph 170) and Paragraph 181 in relation to AQMAs.</p> <p>Will the Policy be Effective - The Sustainability Appraisal of the pre-submission Tewkesbury Borough Plan (CD006) concludes that policy requirements for SUDs and measures to reduce run-off rates should promote minor positive effects, with some uncertainty remaining until detailed project level studies are completed, and that the requirement to contribute to green infrastructure; and deliver a biodiversity net gain, will confirm the likely positive effect of the development of the site.</p>

TEW4 - Healings Mill	<p>Is the Policy Justified – Yes because as well as providing a policy link to the Tewkesbury Town Regeneration Supplementary Planning Document (DPO05) site-specific policy requirements for the conservation of heritage assets are justified, whilst requirements related to Green Infrastructure/net gain are justified due to the proximity to the nearby Severn Ham SSSI site, and flood risk measures due to the high risk of flooding</p> <p>Is the Policy Consistent with the NPPF - the policy is consistent with the NPPF and in particular Paragraph 117 on the effective use of land, Paragraph 170 on establishing coherent ecological networks and paragraph 160 in relation to the flood risk Exception Test.</p> <p>Will the Policy be Effective - The Sustainability Appraisal of the pre-submission Tewkesbury Borough Plan (CD006) concludes that policy requirements for prioritising conservation, addressing flood risk and contributing to enhancements in Green Infrastructure will lead to minor positive and positive impacts.</p>
BIS2 – Land at Homelands Farm	<p>Is the Policy Justified – Yes because concerns over the potential major negative effect against SA objective 5 ‘Access’ have justified the specific policy requirements to ensure active and sustainable travel is enabled. Policy requirements relating to Green Infrastructure and achieving the integration with the adjacent Homelands 2 development are required to promote good design. A net gain is required in order to stem overall declines in biodiversity.</p> <p>Is the Policy Consistent with the NPPF – policy is consistent with the NPPF and in particular Paragraph 127 on creating places that are safe, inclusive and accessible and Paragraph 170 on establishing coherent ecological networks.</p> <p>Will the Policy be Effective – The policy requirement for pedestrian and cycle connectivity and integration with existing developments, in particular to the south and east are recognised as having the potential to reduce the developments impact to at least minor negative effects, whilst TBP Policy NAT1 and BIS2 Policy requirement for Green Infrastructure and achieving a biodiversity net gain will be effective in improving this further.</p>
BIS3 – Land at allotments off A435	<p>Is the Policy Justified – Yes in addition to the existing use of the site as allotments, which TBP Policy RCN3 ‘Allotments and Community Gardens’ require must be replaced with facilities of comparable extent within the area. The policy is also justified on the basis of its proximity to, and need to integrate with, Cleavelands as well as reinforcing the need to direct development away from areas at greatest risk of flooding, adding as suggested by the Environment Agency during pre-submission consultation that all built development must be located in Flood Zone 1 taking into account appropriate, locally specific allowances for climate change.</p> <p>Is the Policy Consistent with the NPPF – the policy is consistent with the NPPF and in particular Paragraph 91c) on enabling and supporting healthy lifestyles through the provision of, amongst other things, allotments, Paragraph 127 on creating places that are safe, inclusive and accessible, Paragraph 155 on directing development away from areas at greatest risk of flooding and Paragraph 170 on establishing coherent ecological networks.</p>

	<p>Will the Policy be Effective - A Statement of Common Ground (SOCG7) has been prepared to demonstrate that with the policy the site is deliverable within the plan period and can therefore be considered effective.</p>
<p>WIN1 – Land off Delavale Road/Orchard Road</p>	<p>Is the Policy Justified – Yes the policy is justified on the grounds that it is required to ensure that the location specific issues arising from being within the AONB are mitigated and other requirements relating to accessibility, ecology and flooding are addressed.</p> <p>Is the Policy Consistent with the NPPF – the policy is consistent with the NPPF and in particular Paragraph 172 on giving great weight to conserving and enhancing, in this case the AONB, Paragraph 127 on creating places that are safe, inclusive and accessible, Paragraph 155 on directing development away from areas at greatest risk of flooding and Paragraph 170 on establishing coherent ecological networks.</p> <p>Will the Policy be Effective – With regard to the most important aspect of the development of this site, the location within the AONB, the policy will ensure that this is done sympathetically by requiring that suitable developable areas on site must themselves be informed by a Landscape and Visual Impact Assessment.</p>
<p>COO1 – Land at junction of A38/A4019</p>	<p>Is the Policy Justified – Yes Coombe Hill is a settlement in its own right but sits within the Parish of the Leigh. Its position in the spatial hierarchy as a Service Village and the availability of sites at its heart are seen by the Council as an opportunity for place making. The policy is therefore justified as it adds site specific requirements, for a landmark building for example,</p> <p>Is the Policy Consistent with the NPPF – this policy is consistent with the NPPF and in particular Paragraph 127d) on establishing a strong sense of place, Paragraph 91a) on creating active street frontages as a means of promoting social interaction and achieving the aim of achieving healthy inclusive and safe places, Paragraph 127 on creating places that are safe, inclusive and accessible and Paragraph 170 on establishing coherent ecological networks.</p> <p>Will the Policy be Effective - The policy includes a number of requirements to ensure that its aim of place making is achieved: active street frontages, accessible public open space, enhanced accessibility on foot, the potential for a landmark building providing focus and enhancements to green infrastructure.</p>
<p>SHU1 - Land at corner of Badgeworth Lane and A46</p>	<p>Is the Policy Justified – Yes the policy is justified on the grounds that it is required to ensure that the location specific issues arising from the sites location in the Green Belt and within the setting of the Cotswold AONB are mitigated.</p> <p>Is the Policy Consistent with the NPPF – this policy is consistent with the NPPF and in particular Chapter 13, Paragraphs 133 to 147 on Green Belts.</p>

	<p>Will the Policy be Effective - A Statement of Common Ground (SOCG10) has been prepared to demonstrate that with the majority of the policy requirements the site is deliverable within the plan period and can therefore be considered effective. There is however disagreement between the parties over the policy's requirement for net gain and mitigation for the SAC</p>
SHU2 - Land north of Leckhampton Lane	<p>Is the Policy Justified – Yes the policy is justified on the grounds that it is required to ensure that the location specific issues arising from the sites location in the Green Belt and within the setting of the Cotswold AONB are mitigated.</p> <p>Is the Policy Consistent with the NPPF - this policy is consistent with the NPPF and in particular Chapter 13, Paragraphs 133 to 147 on Green Belts.</p> <p>Will the Policy be Effective - A Statement of Common Ground (SOCG11) has been prepared to demonstrate that with the policy requirements the site is deliverable within the plan period and can therefore be considered effective.</p>
SHU3 - Garage site at Harrison	<p>Is the Policy Justified – Yes the policy is justified in order to ensure that this specific site comes forward as affordable housing.</p> <p>Is the Policy Consistent with the NPPF - this policy is consistent with the advice at Paragraphs 61 and 117 of the NPPF.</p> <p>Will the Policy be Effective - Yes, this is a Council owned brownfield site which provides an opportunity to deliver affordable housing in a sustainable location.</p>
TOD1 – Land adjacent to Pheasant Public House	<p>Is the Policy Justified – Yes the policy is justified on the grounds that it is required to ensure consideration of a specific constraint (mains gas pipeline in the vicinity of the site) and that the location specific issues arising from the sites location in the designated Special Landscape Area within the setting of the Cotswold AONB are mitigated.</p> <p>Is the Policy Consistent with the NPPF - the policy is consistent with the NPPF and in particular Paragraph 172 on giving great weight to conserving and enhancing, in this case the AONB, Paragraph 127 on creating places that are safe, inclusive and accessible and Paragraph 170 on establishing coherent ecological networks.</p> <p>Will the Policy be Effective - A Statement of Common Ground (SOCG13) has been prepared to demonstrate that with the policy requirement to implement the suggested mitigation within the Tewkesbury Borough Plan – Assessment of Site Allocation Impacts on the Cotswold AONB (Toby Jones Associates, April 2019) (EB021) the site is deliverable within the plan period and can therefore be considered effective.</p>
WOO1 – Land adjacent to Oxbutts Caravan Park	<p>Is the Policy Justified - Yes the policy is justified as the site is located in a sensitive landscape setting. The nature of the development defined in the policy is retirement park homes.</p> <p>Is the Policy Consistent with the NPPF – this policy is consistent with the NPPF and in particular Paragraph 61 which states that the size, type and tenure of housing needed for different groups in the community, including Older People should be assessed and reflected in planning policies.</p>

	<p>Will the Policy be Effective - A Statement of Common Ground (SOCG14) has been prepared to demonstrate that with the policy the site is deliverable within the plan period and can therefore be considered effective in both establishing requirements to mitigate the impact on the AONB and on providing for a defined demographic demand/need.</p>
<p>FOR1 – Land at corner of Bishops Walk and School Lane</p>	<p>Is the Policy Justified - Yes the policy is justified as the design and siting of the development is key to ensure it is sympathetic to location within, and within the setting of a conservation area with numerous listed buildings.</p> <p>Is the Policy Consistent with the NPPF – the policy is consistent with the NPPF and in particular Paragraph 127c) that states that planning policies should ensure that developments are sympathetic to local character and history.</p> <p>Will the Policy be Effective - The policy will be effective in ensuring that the development has no detrimental “effect on the character of the settlement, its historic environment and its rural landscape setting.”</p>

3.3.6 *In some cases further specific questions are set out below.*

TBC Response

[TABLE 3.5]

Site	Further Site-Specific Questions
TEW4 - Healings Mill	<p>Question - Should the site boundary be amended to exclude the SSSI?</p> <p>TBC Response – With regard to Site TEW4 (Healings Mill, Tewkesbury), whilst it is acknowledged that part of this site is located within the Severn Ham SSSI, the area in question is largely previously developed land comprising redundant hardstanding and the remains of (now demolished) buildings. It is not considered to contribute to the special scientific interest of the designation in its current form and TBC views the redevelopment of TEW4 as an opportunity to restore the SSSI habitats that no longer exist on the site. Indeed, Policy TEW4 of the Pre-submission TBP (PSTBP) requires that proposals on the site deliver a biodiversity net gain, which may include the expansion/restoration of the habitats associated with the Severn Ham SSSI. Furthermore, it has been identified that the western most part of TEW4 (which falls within the SSSI) is owned and managed by Tewkesbury Town Council and is not available for development. As part of the statements of common ground with Gloucestershire Wildlife Trust and Tewkesbury Town Council, TBC propose to exclude this area from TEW4 and consequently the extent of SSSI on the site is to be reduced. Moreover, the site’s allocation for housing is predicated on the conversion/ sensitive redevelopment of the Grade II Listed Mill and Warehouse buildings occupying the eastern part of the site that falls outside of the SSSI. The site is also at high risk of flooding and the more open parts of the site (including the area within the SSSI) are unlikely to be suitable for new development due to the potential impact of this on flood storage and flows. Finally, Policy NAT1 of the PSTBP states that development likely to result in the loss, deterioration or harm to features, habitats or species of importance to biodiversity (including SSSIs) will not be permitted unless the benefits of development outweigh the impacts and the mitigation hierarchy (avoid/mitigate/compensate) is followed. This is consistent with the approach at paragraph 175 of the NPPF which advises that development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it should not normally be permitted unless the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest.</p>

BIS3 – Land at allotments off A435

Question – Is new primary school provision necessary at Bishops Cleeve?

TBC Response - GCC Cabinet Report 01.12.2020 on the Establishment and Construction of a new 3FE (630 place) Primary School in Bishop's Cleeve states that the Reasons for the recommendation is - Gloucestershire County Council's School Places Strategy 2018-23 identifies the need for additional primary school places for children and young people living in Bishop's Cleeve. This has arisen primarily from additional local housing in the area. Consideration of options for providing these additional places is summarised but due to the residential areas the school places will serve, the capacity for expansion at existing schools and the responsibility to accommodate increasing demand from permitted, allocated and windfall sites, a new 3FE school to the north of the village is recommended.

Question – Would the allocation of site BIS3 for a primary school or mixed housing/primary school be justified?

TBC Response - GCC are in the process of signing contracts for the land purchase of an alternative primary school site in Bishops Cleeve, with confirmation received on the 27th January that exchange of contracts is expected for land at Bishops Cleeve (for the school) on Friday 29th January. In light of this, Site BIS3 is not now required for the provision of a primary school.

Question – If not, where should provision be made?

TBC Response - An alternative location has been identified by GCC and approved by GCC's Cabinet. . Details of the specific location are to be made available by GCC in due course

Question – Would a further allocation or settlement boundary change to reflect the permission for housing granted on appeal at Stoke Road, Bishops Cleeve be justified?

TBC Response – As the Stoke road site has already been granted planning permission by the Secretary of State the Council do not regard its allocation to be necessary within the plan. However, as set out within the Schedule of Changes addendum ([CD011a](#)), it is proposed to amend the settlement boundary to include the land associated with the development (PM76).

Question – What are the proposals for the Cleeve Wood Properties land?

TBC Response – The site is part of an existing employment allocation (Malvern View Business Park) carried over to the Borough Plan. The site is partly developed and it is the undeveloped capacity that has been carried it over in its entirety. The Bruton Knowles Employment Land Review ([EB002](#)) finds it to be viable for continued employment use. It gives it an A rating.. Category A sites represent very good/good sites for B class development. The best sites in the borough – whose exclusion or loss would be detrimental to the Borough's future economic prospects over the Plan period and more specifically in the JCS economic growth targets. Cleeve Wood Properties are promoting it for housing. The site is considered in the employment background paper as Bishops Cleeve site 4, where it is given an A rating. The justification is NPPF paragraph 120, on the basis of the Bruton Knowle's conclusions, it is considered there is reasonable prospect for the remainder of the site being developed for employment purposes.

	<p>The housing site promoter identifies the site as being suitable for development as the site is adjacent to Bishops Cleeve and is developable as it is identified as employment land. In addition, the Stoke Park land has been granted on appeal and is to the west of Malvern View Business park, adjacent to this site, which provides a basis for planning.</p>
<p>WIN1 – Land off Delavale Road/Orchard Road</p>	<p>Question – Would the proposal amount to major development in the AONB? TBC Response - Section 13 of the Housing Background Paper (EB013) considers whether this proposed allocation would constitute major development in the context of paragraph 172 of the NPPF. The NPPF advises, at footnote 55, that whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.</p> <p>In the Housing Background Paper (EB013) it concludes that: Para. 13.6 The nature of the development, 2 storey houses of different types and sizes will be guided by policy WIN1 to be landscape led and appropriate. Para. 13.5 The scale of the development, 80 dwellings equating to 4% increase, is not considered to be major within the context of the town. Para. 13.7 Refers to the Cotswold AONB Management Plan 2018-2023 to establish the setting and purpose for which it has been designated and in Para. 13.8 based on the work of Toby Jones Associates, The Landscape and Visual Sensitivity Study - Rural Service Centres and Service Villages, November 2014 (EB020) which considers the landscape character sensitivity of the site with reference to the relevant Cotswold AONB Character Area (1B - Langley Hill - (Escarpment Outlier), and concludes that, “the landscape character sensitivity to be low and the visual sensitivity to be low.” And that, “On this basis and subject to an appropriate design, layout, materials and landscaping being secured in accordance with policies WIN1 and SD7 it is not considered that the proposal would conflict with the purposes for which the area has been designated.</p> <p>Question – Are there exceptional circumstances and would it be in the public interest? (The tests in NPPF paragraph 172) TBC Response - NPPF Paragraph 172 advises that major development should only be permitted in ‘exceptional circumstances’, and where it can be demonstrated that the development is in the public interest. The Council’s position, set out in Paragraph 13.9, of the Housing Background Paper (EB013) is that although not major development exceptional circumstances can be demonstrated and the development would be in the public interest. The evidence given is that, “there have only been 271 new dwellings committed at Winchcombe during the plan period which is some 326 dwellings below its indicative requirement.”</p>

In support of the public interest they refer to evidence that there is an unmet demand for Social Housing actually in Winchcombe stating that the authority's housing register, "(August 2019) demonstrates a need for 85 dwellings from people/families with a local connection to Winchcombe."

Question – To what extent would the proposal conserve and enhance landscape and scenic beauty in the AONB?

TBC Response - Care has been taken to develop policy requirements in WIN1 and SD7 that ensure that any impact on the AONB is minimised. WIN1 will ensure that this is done sympathetically by requiring that suitable developable areas on site must themselves be informed by a Landscape and Visual Impact Assessment. WIN1 also contains a requirement for development on prominent slopes to be avoided and built development, supporting infrastructure, open space and community facilities to be located below the 115 metre contour line as identified in the Winchcombe Town Landscape and Visual Sensitivity Study (Toby Jones Associates, November 2014).

Question – If acceptable in principle, is the precise boundary of the site justified in the light of the topography?

TBC Response - The Winchcombe Town Landscape and Visual Sensitivity Study, November 2014 ([EB019](#)) found that development up to the 115m contour is capable of being acceptable if designed sensitively with a feathered built edge and new boundary planting (Paragraph 3.7). The site allocation boundary adopts this parameter as the western site boundary.

Question – Should areas of adjacent land be included?

TBC Response -

The site boundary has been defined on the basis of the 115m contour, which is defined in the Winchcombe Landscape Sensitivity Study, as it is an indicative parameter to development, and if development is located below the 115m contour with a landscaped feathered edge is capable of having an acceptable impact on the AONB. Land adjacent to the western boundary of the allocation would be located above the 115m contour and there would be potential concerns over the impact of development on the AONB.

FOR1 – Land at corner of Bishops Walk and School Lane

Question – In light of the PC R19 consultation response is the allocation justified?

TBC Response – The Council accept that whilst this site was added at a time when community support for the development of a Neighbourhood Plan and some small scale housing growth existed, the impetus for both has now dwindled and therefore the allocation would no longer be consistent with JCS Policy SP2s Spatial Hierarchy and SD10 (Residential Development). For this reason and issues raised by Historic England the allocation can no longer be justified. A main modification is therefore proposed to remove this from the Plan. It is not counted in the overall housing figures, so these will not be affected.

	<p>Question – As an alternative, would Policy RES4 provide a suitable basis for considering any scheme that comes forward?</p> <p>TBC Response - Policy RES4 in the pre-submission Plan would apply to Forthampton as one of ‘the Borough’s other rural settlements’ and would still provide the opportunity for ‘very small scale residential development’ schemes that come forward to be considered.</p>
<p>BRO1 – Land adjacent to Hucclecote Road and Golf Club Lane and BRO2 – Nerva Meadows, Gloucester Business Park</p>	<p>Question – Is the impact of the allocations on the Cotswold Commons and Beechwoods SAC in relation to additional recreational pressure adequately addressed?</p> <p>TBC Response – Yes Policy NAT5 ‘Cotswold Beechwoods SAC’ explicitly requires new development to ensure that there is no loss of integrity to the European designated site – alone or in-combination with other plans and projects. This policy was added specifically to address concerns from NE regarding the increased accumulative recreational pressures on the Beechwoods and dialogue between the three JCS authorities and NE during August and September 2018 that resulted in consensus being reached over a collaborative approach to visitor surveys of the SAC in 2019. This gave the three LPAs greater certainty over the significance of recreation effects upon this SAC and to devise suitable mitigation measures, where necessary. A meeting was held with NE in March 2019 to clarify matters and this informed the further development of TBP Policy NAT1, as well as the HRA and the SA.</p>

Matter 3B: Settlement Boundaries outside the Green Belt

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

Question

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).

TBC Response

3.4.1 Yes. Defined boundaries in the adopted 2006 plan were only used as a starting point for revised settlement boundaries in the pre-submission Plan. The pre-submission Plan applies JCS Policy SP2's approach to a 'settlement hierarchy', the subsequent updated JCS Rural Area Settlement Audit, July 2017 (EB011) and JCS Policy SD10 for development in other rural areas. Paragraph 8.2 in the Housing Background Paper ([EB013](#)) explains the methodology adopted.

3.4.2 The decision not to roll-forward the settlement boundaries is justified on the basis that the four villages did not meet the requirements to be located higher within the settlement hierarchy as 'Service Villages' in the 2015 settlement audit or again in the July 2017 Settlement Audit refresh (EB011).

3.4.3 Out of the 75 named settlements assessed:

- Apperley was ranked 33 in 2015 and 32 in 2017;
- Ashleworth was ranked 19 in 2015 and 22 in 2017;
- Dumbleton was ranked 37 in 2015 and the same in 2017; and
- Gretton was ranked joint 33rd in 2015 and 29 in 2017.

3.4.4 Bringing these settlements in line with the new spatial strategy is also justified as Policy RES4 in the pre-submission Plan provides a potentially enhanced opportunity for 'very small scale residential development' within 'the Borough's other rural settlements' rather than "infilling only" within the TBP (2006) HOU3 "Other Villages".

Question

3.5 Would defined boundaries for any other freestanding settlements be justified?

TBC Response

3.5.1 No - Paragraph 3.28 of the Pre-submission Plan states 'Due to the generally low levels of service provision, job opportunities and public transport availability beyond those settlements within the hierarchy, many of the Borough's other rural settlements are only suitable for very small-scale residential development. Therefore, settlement boundaries have not been defined around the Borough's other rural settlements and

no land has been specifically allocated for residential development to help meet the Borough's objectively assessed needs to 2031. Any development that accrues from this source will therefore be 'windfalls'. Evidence to support this can be found in the most recent JCS Rural Area Settlement Audit Refresh (EB011) published in July 2017.

Question

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?

Question

3.6.1 What are the criteria that have been used to define the settlement boundaries in the plan?

TBC Response

3.6.1.1 The Criteria is to be found in paragraphs 8.1 to 8.5 of the Housing Background Paper ([EB013](#)):

- **Criteria 1** – is a settlement within the hierarchy set out within the Pre-submission plan:
 1. Tewkesbury Town Area;
 2. An Urban Fringe Settlement;
 3. A Rural Service Centre;
 4. A Service Village; or
 5. Has 'an adopted Neighbourhood Plan which includes a settlement boundary and identifies land for housing development' which paragraph 8.4 says was 'reflected in the preferred options TBP'
- **Criteria 2** – The starting point was the Residential Development Boundaries (RDBs), if the settlement meeting Criteria 1 had one set out in the Tewkesbury Borough Local Plan to 2011 (policies HOU2 and HOU3).
- **Criteria 3** – RDBs in Criteria 2 extended to include land adjacent to the RDB that has since been developed, benefiting from planning permission for residential development (but not yet developed) and/or has also been included along with the proposed housing site options set out at Policy RES1 of the preferred options TBP.
- **Criteria 4** - creating a neater, more robust boundary where appropriate, for example by the inclusion of land and dwellings immediately adjacent to the RDB

that is clearly part of the settlement and its inclusion in the boundary would not cause any significant planning policy conflict.

- **Criteria 5** – ‘At those settlements for which a RDB was not defined in the TBLP the Council’s general approach has been to include all development within the continuous built up area of the settlement, including any adjacent land benefiting from planning permission for residential development (but not yet developed) and the proposed housing site options set out at Policy RES1 of the preferred options TBP, but excluding the following:
 1. individual buildings or groups of dispersed buildings which are clearly detached from the continuous built up area of the settlement;
 2. gardens, paddocks and other undeveloped land within the curtilage of buildings on the edge of the settlement where land relates more to the surrounding countryside than to the built up area of the settlement;
 3. agricultural buildings and associated land on the edge of the settlement; and
 4. outdoor sports and recreation facilities and other formal open spaces on the edge of the settlement.
 5. Land within the Greenbelt.

Question

3.6.2 *Have the criteria been followed consistently?*

TBC Response

3.6.2.1 The Housing Background Paper ([EB013](#)) demonstrates that the criteria has been followed consistently reporting not only on the criteria but also on its application and providing results as appendices.

Question

3.6.3 *Are the detailed settlement boundaries for the various settlements justified and effective?*

TBC Response

3.6.3.1 The criteria is justified on the basis that it is necessary to direct future development to the most sustainable locations, ensure the growth that is necessary to ensure the vitality of other settlements is permitted but also to protect the borough’s largely rural landscape.

3.6.3.2 The criteria are effective in pragmatically achieving a balance between identifying not only the existing and proposed development within settlement envelopes but

also the most sustainable locations for future development without compromising the protection of the countryside from incremental encroachment.

Question

3.6.4 *Would any changes be justified to accommodate any recent planning permissions or for any other reason?*

TBC Response

3.6.4.1 Criteria 3 and 5 ensure that planning permissions gained up until production of the pre-submission draft TBP were included. Including more recent permissions could be included as an Inspector recommendation to update prior to adoption in the final Examination Report, should the Inspector be minded to do so. This itself, however, would be snapshot in time, during the plan period and further changes would be best considered in the next review of the plan.

Question

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?*

Question

3.7.1 *Is the slightly different approach taken in defining the settlement boundaries of Coombe Hill, Minsterworth and Toddington justified?*

TBC Response

3.7.1.1 Paragraph 8.6 of the Housing Background Paper ([EB013](#)) explains that this is justified because 'these are all dispersed or fragmented settlements whereby it has been necessary to identify specific areas to which a settlement boundary should apply' because, for example, 'In the case of Coombe Hill, the settlement limits are not well defined at present. Enveloping the whole of the village area would either result in the inclusion of large swathes of greenfield land that would consequently become suitable (in principle) for residential development in accordance with Policy RES2 of the Pre-submission TBP, or the creation of a convoluted, fragmented boundary drawn around the individual groups of dwellings. Instead [in the Coombe Hill example] the Council has opted to define a compact boundary based around the services within the village and the housing site allocations set out at Policy RES1 of the preferred options TBP.'

Question

3.7.2 What levels of development might result from the extended boundaries?

TBC Response

3.7.2.1 Toddington: The levels of development that would result from the new boundary would be mainly be limited to the proposed site allocation TOD1. The large area of land to the west of TOD1 has permission for 33 dwellings and is under construction. That is in addition to dwellings which have already been developed along this stretch of road. Otherwise, there may some potential for limited infill.

3.7.2.2 Coombe Hill: The main allocations in the extended boundaries are for COO1 and COO2. There is however, on area of land which contains the public house and car park. This area of land could possibly accommodate in the region of 10 dwellings. It is worth noting that the site accommodates significant mature trees forming part of the woodland bloc, which would reduce the suitability of a large part of the area.

3.7.2.3 Minsterworth: The boundary would generally allow for minor infill development. In addition, there are more open areas to the west of the village in close proximity to the village hall, and the north side of the A48. If this area were to be fully developed it could result in approximately 40 dwellings.

Question

3.7.3 Have the implications for these settlements been fully considered and would any changes be justified?

TBC Response

3.7.3.1 Section 8 of the Housing Background Paper ([EB013](#)) demonstrates that the implications of applying the same approach to these settlements has been fully considered and whilst it would 'create a neater, more robust boundary' (Paragraph 8.2), incorporating 'committed developments' (Paragraph 8.8) and 'housing site options' (Paragraph 8.9); it would lead to, 'the inclusion of large swathes of greenfield land that would consequently become suitable (in principle) for residential development in accordance with Policy RES2 of the Pre-submission TBP; or the creation of a convoluted, fragmented boundary drawn around the individual groups of dwellings' (Paragraph 8.7) and harm to the 'essential rural character' of the area and 'areas of priority habitat' (Paragraph 8.8).

Urban Fringe Settlements

Question

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? (e.g. land west of Cockroft Lane, north of Grovefield Way, north of Leckhampton Lane)

TBC Response

3.8.1 The JCS rural area settlement audit ([EB011a](#)) proposes the rationale for defining urban fringe settlements. The settlements on the fringes of Gloucester and Cheltenham that lie within Tewkesbury Borough are considered as such as they are settlements that are inherently accessible and well serviced due to their locations. However, in comparison to areas such as Land West of Cockroft Lane, north of Grovefield Way and North of Leckhampton Lane, these urban fringe settlements do not abut the urban areas of Cheltenham and Gloucester but are part of the immediate hinterland of the major urban areas. For comparison, areas such as Brockworth, Churchdown, Hucclecote, Innsworth and Uckington have major infrastructures such as the M5, main road networks, railway lines or in some cases green belt land which physically detaches them in some way from the main urban areas of Cheltenham and Gloucester. These physical barriers therefore provide some form of disconnection from the main urban areas themselves which means they are better considered urban fringe settlements. Locations such as Land West of Cockroft Lane, north of Grovefield Way and North of Leckhampton Lane are more closely related to adjacent settlements within the boundaries of Gloucester and Cheltenham such as Prestbury, Up Hatherley and Leckhampton who do not fall within Tewkesbury Borough. Identifying these areas, that are of a relatively smaller size in terms of the amount of built up area that falls within Tewkesbury Borough, as urban fringe settlements would be unsuitable due to their closer affiliation with the remaining parts of the settlement located outside of Tewkesbury Borough.

Question

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?

TBC Response

3.9.1 The criteria set-out in Paragraph 8.1 of the Housing Background Paper ([EB013](#)) and included above in answer to [question 3.6](#) was applied, as a result of Urban Fringe Settlements satisfying Criteria 1, bullet point 2.

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

Shurdington

Question

3.10 When was the Green Belt inset boundary for the settlement first defined and has it been reviewed subsequently?

TBC Response

3.10.1 The Gloucester/Cheltenham Green Belt, in which Shurdington sits, was designated in 1968 to protect the open character of the land between the two settlements. The first Gloucestershire County Structure Plan in 1981 extended the Green Belt to include an area north of Cheltenham in order to protect the gap between Cheltenham and Bishop's Cleeve.

3.10.2 The JCS deleted parts of the Green Belt to allow for strategic expansion of Cheltenham and Gloucester. 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'

Question

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?

Question

3.11.1 *Have exceptional circumstances been established for allocations and an extended inset boundary for Shurdington within the Green Belt?*

TBC Response

3.11.1.1 Yes, a review of the Green Belt Boundary in Shurdington was justified primarily on the basis that housing land need constituted exceptional circumstances for the reasons set out below.

- 3.11.1.2 Paragraph 136 of the NPPF provides that Green Belt boundaries should only be altered in exceptional circumstances. Policy SD5(2) of the JCS provides that: The boundaries of the reviewed Green Belt are identified on the Proposed Changes to the Green Belt Boundary map. Consideration will be given to a limited review of the Green Belt in other locations as necessary through the Borough Plans, where this is justified by exceptional circumstances. Paragraph 5.10 of the Pre-Submission Plan provides that the removal of land from the Green Belt at Shurdington is considered essential in this instance in order to provide housing to meet local needs at one of the Borough's largest and most sustainable Service Villages. There are no suitable and sufficient alternatives at Shurdington that involve land located outside the Green Belt. This is in accordance with paragraph 138 of the NPPF which provides that: when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account.
- 3.11.1.3 In July 2017 the Council commissioned Land Use Consultants Ltd to undertake a Part 2 (Partial) Green Belt Review to inform the preparation of the Tewkesbury Borough Plan (hereinafter referred to as 'the Green Belt review').
- 3.11.1.4 Both Housing Site SHU1A (land at Badgeworth Lane) and SHU2B (land at Leckhampton Lane) are located within areas that are assessed in the Green Belt review as making a relatively weak contribution to Green Belt purposes. Consequently, the Green Belt review finds that the removal of the sites from the Green Belt would result in a relatively low level of harm to the Green Belt.
- 3.11.1.5 It is considered exceptional that these sites in one of the two most sustainable Service Villages have relatively weak contributions to Green Belt purposes. The conclusion of the Green Belt Review was that delivering housing development in accordance with the JCS strategy on these sites will result in a relatively low level of harm to the Green Belt and will result in a stronger more defensible boundary.
- 3.11.1.6 Shurdington is the second largest service village, is the joint highest scoring Service Village for functionality (along with Highnam) and is the highest scoring Service Village in accessibility terms. Shurdington consequently has a relatively high 'indicative' housing requirement of 141 dwellings. However, as of April 2019, only 15 dwellings had been committed at the village which is exceptionally low in comparison to the other service villages in the Borough. Shurdington is entirely surrounded by Green Belt and its settlement boundary within the TBLP to 2011 is tightly drawn around the built up area of the village. It is clear that the Green Belt designation at Shurdington has had the effect of constraining housing growth.

Without appropriate changes to the Green Belt boundary opportunities for future growth will be extremely limited. This would not only represent a missed opportunity to capitalise on the village's sustainability credentials, but it could have adverse effects on the affordability of housing in the village and the vitality of its communities. These are considered to represent exceptional circumstances justifying the appropriate removal of land from the Green Belt to enable housing growth.

- 3.11.1.7 The Green Belt review also identifies a number of fairly significant areas of well-established existing residential development to the southwest, east and north east of the village that perform weakly against Green Belt purposes as they almost fully developed and therefore lack openness and characteristics of the countryside (Housing Background Paper (EB013), Para. 8.3). This plan proposes to remove these areas from the Green Belt in order to create a new, robust and defensible Green Belt boundary.

Question

3.11.2 *Has the need for these been established through the JCS?*

TBC Response

- 3.11.2.1 Yes, the amount of development required to address the 'objectively assessed needs' of the borough (along with Cheltenham and Gloucester) over the period up to 2031 is set out in the JCS.
- 3.11.2.2 The Housing Background Paper (EB013) explains in paragraph 2.3 that, "The JCS identifies through Policy SP1 that Tewkesbury Borough Council will need to accommodate at least 9,899 new homes over the plan period between 2011 to 2031. The strategy for accommodating this identified need is set out at Policy SP2 which states that at least 7,445 dwellings will be provided through existing commitments, development at Tewkesbury town in line with its role as a market town, smaller-scale development meeting local needs at Rural Service Centres and Service Villages, and sites covered by any Memoranda of Agreement.
- 3.11.2.3 Paragraph 2.4 goes on to highlight that, "the adopted JCS identified a shortfall against the total JCS requirement of approximately 2,450 dwellings, although this figure has now reduced due to further commitments."
- 3.11.2.4 The JCS recognises that there is a need for a lower level of development in the rural parts of the borough to enhance or maintain the vitality of rural communities.

- 3.11.2.5 The amount of non-strategic new housing development needed in Tewkesbury borough over the plan period is set out in the JCS Policy SP2. The JCS identifies that:
- 3.11.2.6 “Rural service centres and service villages (as identified in table SP.2c below) will accommodate lower levels of development to be allocated through the Tewkesbury Borough Plan and neighbourhood plans, proportional to their size and function and also reflecting their proximity and accessibility to Cheltenham and Gloucester and taking into account the environmental, economic and social impacts. Over the plan period to 2031,
- The rural service centres will accommodate 1860 new homes, and
 - The service villages will accommodate 880 new homes
- (In the remainder of the rural area, Policy SD11 will apply.)”
- 3.11.2.7 In determining how this non-strategic housing development should be disaggregated between settlements the JCS Policy SP2 requires consideration of the size, function, proximity and accessibility to Cheltenham and Gloucester of the borough’s rural service centres and service villages, taking into account the environmental, economic and social impacts.
- 3.11.2.8 The submission JCS policy SP2 provides a framework to be used in the Tewkesbury Borough Plan to determine the appropriate level of development to be accommodated in the rural service centres and at the service villages. The criteria relate to accommodating levels of development proportional to their size and function and also reflecting their proximity and accessibility to Cheltenham and Gloucester taking into account the environmental, economic and social impacts. This has resulted in an ‘indicative’ requirement of 141 dwellings for Shurdington.
- 3.11.2.9 Policy SD5 of the JCS (Green Belt) also allows for consideration to be given to a limited review of the Green Belt through the District Plans where this is justified by exceptional circumstances.
- 3.11.2.10 The disaggregation process for Service Villages began in 2014 when representatives formed the Service Village Forum to discuss between themselves how development could be appropriately allocated across the rural parts of Tewkesbury Borough. The intention was to help provide evidence for those parishes preparing a neighbourhood plan as to what housing numbers they might reasonably be expected to accommodate, and also to support the local planning authority to

prepare the Tewkesbury Borough Plan (Housing Background Paper (EB013), Para. 4.3).

Question

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?

Question

3.12.1 *What evidence is there that the additional housing development that would be provided by the allocations and extended boundary at Shurdington is needed?*

TBC Response

3.12.1.1 An explanation of the establishment of the 'objectively assessed needs' for the borough, the JCS Policy SP2 Spatial Hierarchy and the Disaggregation process is given in answer to [Question 3.11.2](#), above, which results in an 'indicative' housing requirement of 141 dwellings.

3.12.1.2 The Housing Background Paper ([EB013](#)) explains in paragraph 12.6 that not only is Shurdington a Service Village but it is the joint highest scoring Service Village for functionality (along with Highnam) and is the highest scoring Service Village in accessibility terms. This is set against a lack of growth over the plan period to April 2019 with only 15 dwellings having been committed at the village which is exceptionally low in comparison to the other service villages in the Borough and as the Housing Background paper points out it is the second largest service village.

3.12.1.3 Paragraph 77 of the NPPF requires planning policies and decisions to be responsive to local circumstances and support housing developments that reflect local needs advising that 'to promote sustainable development in rural areas housing should be located where it will enhance or maintain the vitality of rural communities.

Question

3.12.2 *In addition to the proposed allocations, how much additional infill development is likely?*

TBC Response

3.12.2.1 Whilst the settlement boundary would contain some opportunities for limited infilling around the village, the key potential opportunities it would produce are along the gaps of the eastern frontage of the A46, and the junction of the A46 and Leckhampton Lane. This could produce in the region of 35 dwellings potentially.

Question

3.12.3 *Are there any other reasonable options for meeting this need on brownfield land or land outside the Green Belt?*

TBC Response

3.12.3.1 Unfortunately Shurdington is entirely surrounded by Green Belt and its settlement boundary within the TBLP to 2011 was tightly drawn around the built up area of the village which leaves little opportunity for development on land outside the Green Belt and has had the effect of constraining housing growth.

3.12.3.2 SHU3 – Garage site at Harrison is a brownfield site.

Question

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?

Question

3.13.1 *What are the criteria that have been used to define the extended settlement boundary in the plan?*

TBC Response

3.13.1.1 The rationale for the new settlement boundary at Shurdington and resulting Green Belt removal is provided at paragraph 5.9 of the Pre-submission Plan ([CD001](#)), and at paragraphs 8.3 and 12.9 of the Housing Background Paper ([EB013](#)). The Council's Part 2 (partial) Green Belt review, July 2017 ([EB004](#)) is the key evidence base document for this matter and identifies the potential degree of harm that could result if a site were to be removed from the Green Belt.

Question

3.13.2 *Have they been followed consistently?*

TBC Response

- 3.13.2.1 The consistent application of the criteria used to define the extended settlement boundary is set out in the Housing Background Paper ([EB013](#)) and the results included as appendices to that report.

Question

3.13.3 *Is the detailed boundary proposed justified?*

TBC Response

- 3.13.3.1 The proposed boundary has been justified through a rational review of their purpose(s) set against the under-provision of housing, where the capacity to accommodate sustainable development in the urban areas is insufficient to meet the housing requirement. An appropriate balance has been achieved.

Question

3.13.4 *Is the detailed boundary proposed effective?*

TBC Response

- 3.13.4.1 How effective the proposed boundary will be in relation to the express purposes of Green Belt is considered in paragraph 5.9 of the Pre-submission Plan which states that 'In the case of Shurdington, both housing sites SHU1 (land at Badgeworth Lane) and SHU2 (land at Leckhampton Lane) are located within areas that are assessed in the Green Belt review as making a relatively weak contribution to Green Belt purposes.
- 3.13.4.2 Moreover, paragraph 136 of the NPPF advises that (when reviewing Green Belt boundaries) authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. In addition, paragraph 139 states that when defining boundaries, local planning authorities should (inter alia) not include land which it is unnecessary to keep permanently open. The proposed boundary will enable suitable housing sites to come forward and will create a robust defensible boundary that is capable of enduring beyond the plan period.
- 3.13.4.2 As a result the proposed boundary will also be effective in achieving the implied purposes of the Green Belt, such as maintaining landscape quality of an area, providing accessible open space and the opportunity for outdoor recreation for

large numbers of people in urban areas, and safeguarding the lands future value for agriculture/horticulture.

Question

3.13.5 *Should open land to the east of the A46 Shurdington Road be excluded from the Green Belt?*

TBC Response

- 3.13.5.1 The Council's Part 2 (partial) Green Belt review, July 2017 ([EB004](#)) is the key evidence base document for this matter and identifies a number of fairly significant areas of well-established existing residential development to the southwest, east and north east of the village that perform weakly against Green Belt purposes as they are almost fully developed and therefore lack openness and characteristics of the countryside.
- 3.13.5.2 The land to the east of the A46 Shurdington Road has a castellated appearance as a result of small sections of developed land being punctuated by small parcels of undeveloped land. In order to achieve the objective of providing a robust defensible boundary that is capable of enduring beyond the plan period it these small parcels of undeveloped land will be released to allow for a small amount of Windfall development.

Question

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?*

TBC Response

- 3.14.1 Paragraph 12.9 of the Housing Background Paper ([EB013](#)) states that 'The aim and purposes of the Green Belt are set out paragraphs 133 and 134 of the NPPF, paragraph 145 enables limited infilling in Green Belt villages, paragraph 136 advises that (when reviewing Green Belt boundaries) authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period and

paragraph 139 states that when defining boundaries, local planning authorities should (inter alia) not include land which it is unnecessary to keep permanently open.

- 3.14.2 In Shurdington some of the areas in question already lack openness and the new Green Belt boundary is proposed with the aim of providing a robust defensible boundary that is capable of enduring beyond the plan period. For these reasons the proposed boundary is not considered to present any significant conflict with relevant Green Belt policy guidance within the NPPF.
- 3.14.3 Purpose 1: Checking the unrestricted sprawl of large, built-up areas – the impact will be positive in creating a stronger more defensible boundary.
- 3.14.4 Purpose 2: Preventing the merger of neighbouring towns - the small-scale nature and proximity of these sites to Cheltenham and Gloucester and the common sense approach to creating a strong and defensible boundary will not undermine this fundamental purpose.
- 3.14.5 Purpose 3: Safeguarding the countryside from encroachment – the impact will again be positive in creating a stronger more defensible boundary which incorporates areas of previously developed land that may in the past have set a precedent for further encroachment beyond the settlement boundary.
- 3.14.6 Purpose 4: Preserving the setting and special character of historic towns – whilst not a purpose of specific relevance to the Cheltenham/Gloucester Green Belt, the location and small-scale nature of these sites would not undermine this purpose anyway.
- 3.14.7 Purpose 5: Assisting urban regeneration by encouraging the recycling of derelict and other urban land – The small scale, justified release will not undermine the strategic purpose of directing development to brownfield, urban alternatives.

Question

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?**

TBC Response

See [TABLE 3.1](#)

- **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?

TBC Response

See [TABLE 3.2](#)

- **Is the indicative capacity figure for the allocation justified?**

TBC Response

See [TABLE 3.3](#)

- **Is the site-specific policy for the allocation justified, consistent with national policy and would it be effective?**

TBC Response

See [TABLE 3.4](#)