

TEWKESBURY BOROUGH PLAN EXAMINATION

MATTER 2 | OVERALL HOUSING PROVISION IN THE TBP

Grass Roots Planning Ltd on behalf of Cotswold Homes Ltd

Contact: Matthew Kendrick

Email: matthew@grassroots-planning.co.uk

On behalf of Cotswold Homes Ltd and the landowners, this statement sets out our answers to the questions posed by the Inspectors for the Tewkesbury Borough Plan Examination in relation to Matter 3A. Cotswold Homes Ltd have a specific interest in draft allocation BIS3 at the former Nortonham Allotments west of the A435, Bishop's Cleeve but for the purposes of this Matter we will not discuss site specific issues as requested by the Inspector.

Question 2.1 |

What distinguishes non-strategic housing sites within the remit of the TBP from strategic sites within the remit of the JCS? What is the current anticipated timescale for preparation of the JCS review?

2.1.1 We do not have any specific comments on this issue.

Question 2.2 |

Given the provisions of the JCS, the current JCS review, and the subsidiary role of the TBP to allocate non-strategic sites, does the TBP make the required contribution towards meeting the housing needs of Tewkesbury borough over the plan period 2011-2031? Will the remaining shortfall be provided through the JCS review, or in other ways, in the necessary timetable, and if not, is this a matter for the TBP?

2.2.1 It is our understanding that the JCS, via a review, will intend to allocate further strategic sites to meet the residual needs of Tewkesbury Borough in the long-term. However, in the short-term, it is our view the TBP should be seeking to boost housing supply and meet five-year housing land supply targets. A recent appeal decision for land at Ashmead Drive, Gotherington, has confirmed that the Council are only able to demonstrate a 1.82 year supply. Accordingly, it is our view that it is the role of the TBP to meet the shortfall identified through the allocation of additional housing land.

Question 3.3 |

What progress has been made in delivering the anticipated 500 dwellings to meet Tewkesbury's needs at Mitton? Is this provision agreed with Wychavon?

2.3.1 In our view there should be an agreed Statement of Common Ground between TBC and Wychavon District Council with timeframes for the land's allocation and evidence underpinning its deliverability. Without this in place it is difficult to convey that the allocation is justified or will be effective, in accordance with the NPPF.

Question 2.4 |

The JCS states (on page 26) that the 2015 Settlement Audit will be refreshed prior to submission of the TBP. Has this been done, and if so what are the results of the refresh and would any changes to the settlement hierarchy be justified?

2.4.1 The Settlement Audit was updated in 2017 and assessed 75 settlements within Tewkesbury Borough. We consider that the approach taken to the Settlement Audit is appropriate, identifying the number and range of facilities available within a settlement.

2.4.2 We note that Bishop's Cleeve is only outranked by Tewkesbury itself, by one point, as shown in an extract of the Settlement Audit below in figure 1:

Settlement	TOTAL SERVICE & ACCESS SCORES (Max 48)	OVERALL RANK
Tewkesbury	45	1
Bishop's Cleeve	44	2
Winchcombe	41	3
Churchdown	39	4
Northway	38	5
Brockworth	37	6

Figure 1. Extract of JCS Settlement Audit Refresh showing rank of settlements with highest number of services and facilities

- 2.4.3 In our view, this evidence could justify a change to the settlement hierarchy with Bishop's Cleeve moving into a higher tier as a Market Town rather than a Rural Service Centre.

Question 2.5 |

Is the methodology used for identifying housing sites in the TBP, as described in the Housing Background Paper (HBP), appropriate?

- 2.5.1 We have reviewed the Housing Background Paper and we consider that the site selection process is appropriate. It sets out a clear step-by-step process for how sites are assessed against different sustainability objectives, with the site then given an overall score of A-D. This sets out a clear site selection process and accords with the overall objective to delivery homes within the first five years of the plan to address current five-year housing land supply deficits in Tewkesbury Borough.

Question 2.6 |

JCS Table SP2a appears to require the TBP to identify further potential for 315 dwellings. Is this correct, and if so has this requirement been met?

- 2.6.1 The JCS requires the TBP to identify further potential for 315 dwellings. However, since this time TBC have been found unable to demonstrate a five-year housing land supply (estimated at 4.35 years according to the December 2020 paper – and recently found to be just 1.82 years as explained 2.2.1) and accordingly have proposed to allocate additional land for housing to boost supply across the authority area.
- 2.6.2 Therefore, whilst we consider that the JCS requirement has been met, we welcome the approach in boosting housing supply in the short-term across the Borough to ensure five-year housing land supply targets are being achieved, which is clearly required by, and in accordance with, national planning policy
- 2.6.3 The JCS review that is currently underway will seek to identify land to address the shortfall of housing land identified in Tewkesbury due to the delay in the release of land at MOD Ashchurch. It is assumed that a strategic scale site will be identified at this point to address this need.

Question 2.7 |

The JCS provides for housing development at Tewkesbury town 'in line with its role as a market town' but sets no specific housing requirement for the town area. The HBP notes in paragraph 3.7 that smaller scale (non-strategic) sites within the TBP would contribute towards the shortfall in provision identified in the JCS but also states it is not appropriate for the plan to define a housing requirement for the town. Rather, the HBP states that the plan includes all the (non-strategic) sites within or adjacent to the town that are suitable for allocation given the site selection criteria. In this light, is the overall housing provision in the TBP for Tewkesbury town justified, consistent with the JCS and has the plan been positively prepared in this respect?

- 2.7.1 We have no comments to make on this question other than to identify that Tewkesbury is highly constrained and therefore focusing on a supply for the town in isolation to the

remainder of the Borough, within which there are less constrained settlements such as Bishop Cleeve, may lead to delivery risks.

Question 2.8 |

The JCS provides for about 1,860 dwellings at the Rural Service Centres, Bishop’s Cleeve and Winchcombe. Under Policy RES1, three sites are allocated at Bishop’s Cleeve and one at Winchcombe. As at April 2020, taking these allocations, existing commitments and completions into account, the TBP would provide for 2,044 and 354 dwellings respectively in the two settlements, a total of 2,398 dwellings and some 538 in excess of the JCS figure. In this light, is the overall housing provision in the TBP for the two Rural Service Centres justified, consistent with the JCS and has the plan been positively prepared in this respect?

- 2.8.1 In our view, the number of dwellings at Bishop’s Cleeve is justified based on the evidence provided. As set out in our response to Matter 3A, the settlement is only outranked in sustainability terms by Tewkesbury town itself and is therefore a suitable and sustainable option for growth. Our view is that it would be justified to define Bishop’s Cleeve as a Market Town within the settlement hierarchy.
- 2.8.2 The significant number of commitments in Bishop’s Cleeve are largely due to development being allowed via appeal given the historic lack of 5YHLS in the Borough; whilst it is unfortunate that this has not been plan-led there is clearly a strong demand for housing in this location which is now being delivered by developers to boost supply.
- 2.8.3 Bishop’s Cleeve is unconstrained to the north and west of the settlement compared to Winchcombe which is partly within, and almost entirely surrounded by, the AONB. Whilst it is right to identify it as a Rural Service Centre due to the number of facilities it contains for everyday needs, the Plan must also assess whether it can realistically deliver a significant number of homes without compromising key sustainability objectives. In our view the TBP has clearly come to the conclusion via the site selection process and Sustainability Appraisal that they are unable to provide any more homes within Winchcombe without compromising these objectives. As such, we consider that the overall housing provision in the TBP for the two Rural Service Centres is justified, consistent with the JCS (given that it boosts supply above what is required), and has been positively prepared.

Question 2.9 |

The JCS provides for about 880 dwellings at the Service Villages. Under Policy RES1, ten sites are allocated at six of these villages. As at April 2020, taking these allocations, existing commitments and completions into account, the TBP would provide for 1,088 dwellings, some 208 above the JCS figure. In this light, is the overall housing provision in the TBP for the Service Villages justified, consistent with the JCS and has the plan been positively prepared in this respect?

2.9.1 We consider that the overall housing provision provided in the Service Villages is robust given that it seeks to boost supply in accordance with national policy and the JCS which sets out minimum targets.

Question 2.10 |

The TBP identifies six Urban Fringe Settlements (Brockworth, Churchdown, Hucclecote, Innsworth, Longford and Uckington) which are recognised as sustainable settlements closely associated with Gloucester or Cheltenham but no specific housing requirements are set for them in the JCS. Under Policy RES1, two sites are allocated at Brockworth. In this light, is the overall housing provision in the TBP for the Urban Fringe Settlements justified, consistent with the JCS and has the plan been positively prepared in this respect?

2.10.1 We have no comments to make on this question.

Question 2.11 |

On adoption of the TBP and in advance of the JCS review, would there be a satisfactory five-year housing land supply position and if so, for how long? What are the implications of any shortfall and how far, if at all, is this a matter for the TBP?

2.11.1 The Housing Land Supply Paper 2020 establishes that Tewkesbury Borough Council can demonstrate a 4.35 year housing land supply, however, we are aware of a recent appeal decision for land at Ashmead Drive published 12th January 2021 (Appeal Ref: 3256319) which confirms that the Council are only able to demonstrate a 1.82 year housing land supply. This is obviously a significant deficit and it is our view that this ought to be rectified through the provision of additional allocations in the TBP.

- 2.11.2 We note that the sites identified within the TBP are intended to all be 'deliverable', and therefore we anticipate that a significant proportion will be able to be included within the 5YHLS trajectory. Cotswold Homes have previously confirmed that allocation BIS3 (land west of the A435, Bishop's Cleeve) can be delivered within five years subject to a timely planning permission.