

2. Matter 2: Overall housing provision in the TBP

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

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?

TBC Response

2.1.1 The JCS Strategic Site Definition Note (attached at Appendix 1) explains the rationale for the strategic site size threshold and advises that the JCS authorities adopted a figure of circa 500 homes as a strategic site threshold. Sites below this approximate threshold are therefore generally considered to be 'non-strategic' and their allocation will fall within the remit of the TBP.

2.1.2 The Tewkesbury Borough Local Development Scheme (January 2021) was adopted by the Council on 6th January 2021. A copy of the Local Development Scheme (Examination Document CD013). The estimated timetable for the JCS Review to adoption is as follows:

- Issues & Options Consultation – Winter 2018/19
- Preferred Options Consultation – Summer 2021
- Pre-Submission Consultation – Winter 2022
- Submission to the Secretary of State – Spring 2023
- Examination – Summer 2023
- Adoption – Winter 2023

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 2011-31? Will the remaining shortfall be provided through the JCS review, or in other ways, in the necessary timescale, and if not, is this a matter for the TBP?

TBC Response

2.2.1 Policy SP1 of the JCS (The Need for New Development) identifies a housing requirement for Tewkesbury Borough of at least 9,899 new homes over the plan period 2011-2031. Policy SP2 of the JCS (Distribution of New Development) 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. Table SP2a of the JCS provides a more specific breakdown of the sources of supply contributing to

the total supply figure of 7,445. A copy of Table SP2a is set out at Figure 1 below.

Figure 1 – Table SP2a from the Adopted JCS (December 2017) ‘Sources of housing supply in the JCS area’

Tewkesbury Borough	Housing Supply
Completions	3,224
Commitments	2,854
Windfall allowance	552
Tewkesbury Borough Plan (Further Potential)	315
Mitton (Wychavon)	500
Supply Total	7,445

2.2.2 Table SP2a of the JCS identifies the potential for the TBP to provide land for some 315 dwellings as a contribution towards meeting the overall housing requirement for the Borough. As the second tier plan the TBP must comply with and seek to deliver the policies and proposals of the JCS. As stated within the JCS, including at paragraphs 1.5, 3.1.17 and 3.1.18, the purpose of the TBP is to provide more detailed and locally specific planning policies to guide decisions on planning applications and to identify local site allocations. Furthermore, the TBP is to deliver the individual district capacity identified through the JCS in accordance with the spatial strategy (set out at Policy SP2). The TBP is therefore required to contribute some 315 dwellings towards meeting the needs of Tewkesbury Borough over the plan period.

2.2.3 Policy SP2 of the JCS provides specific housing requirements for the Rural Service Centres (RSCs) and Service Villages (SVs) stating that these settlements will collectively provide in the order of 1860 new homes (RSCs) and 880 new homes (SVs). The majority of these requirements have already been delivered or committed. Figure 2 shows the supply position for the RSCs and SVs at April 2020 and shows that the requirement for the RSCs has already been exceeded by some 308 dwellings and the remaining balance at the SVs is 37 dwellings. Figure 2 shows that with the housing allocations in the TBP, the requirements for both the RSCs and SVs will be met with a surplus.

Figure 2 - Rural Service Centre and Service Village Housing Land Supply Overview

Settlement	Indicative Requirement	Existing Completions & Commitments	Remaining Balance	Proposed TBP allocations (where not already committed)	Cumulative	Surplus/deficit against SP2/indicative requirement
Bishops Cleeve	1263	1894	-631	150	2044	781
Winchcombe	597	274	323	80	354	-243
Rural Service Centres Total	1860	2168	-308	230	2398	538
Alderton	53	75	-22	0	75	22
Coombe Hill	22	3	19	75	78	56
Gotherington	86	93	-7	0	93	7
Highnam	130	88	42	0	88	-42
Maiseamore	41	49	-8	0	49	8
Minsterworth	41	84	-43	0	84	43
Norton	24	40	-16	0	40	16
Shurdington	141	16	125	85	101	-40
Stoke Orchard	26	241	-215	0	241	215
Toddington	37	48	-11	25	73	36
Twynning	78	91	-13	0	91	13
Woodmancote	201	15	186	60	75	-126
Service Villages Total	880	843	37	245	1088	208
SP2 TOTAL	2740	3011	-271	475	3486	746

2.2.4 The JCS was adopted with a shortfall of some 2,454 dwellings against the total JCS requirement for Tewkesbury Borough. It is not however the role of the TBP to address the plan period shortfall. This is a strategic matter that is in the process of being addressed through the JCS review which is currently underway, including looking at the role of the Tewkesbury Garden Town in meeting development needs. This is in accordance with Policy REV1 of the JCS (Gloucester and Tewkesbury Housing Supply Review) which makes it clear that the JCS review will cover the allocation of sites to help meet any shortfall in housing supply against the JCS housing requirements for the respective authorities, and JCS Policy SP2 which states that the identification of any additional urban extensions to help meet the unmet needs of a LPA must be undertaken through a review of the plan. Any additional site allocations made through a local plan must be in conformity with the JCS spatial strategy.

2.2.5 Turning to the overall housing supply that would be provided through the TBP, Figure 3 sets out the supply position for the Borough as of April 2020 and includes (uncommitted) supply from the allocations within the TBP. Figure 3 shows that the TBP will provide for some 1,022 uncommitted dwellings which would meet and exceed the required contribution of 315 dwellings set out in the JCS. Figure 3 also demonstrates the effect of further commitments and completions that have taken place since the adoption of the JCS in December 2017. These sources would increase the overall supply to 9,397 dwellings which would reduce the plan period shortfall to 503 dwellings, which would be met via the JCS review.

Figure 3 - Sources of Housing Supply in Tewkesbury Borough

Source	Housing Supply
Completions	5,579
Commitments	1,882
Windfall	414
Mitton (Wychavon)	500
Tewkesbury Borough Plan Allocations	1,022
TOTAL	9,397

2.2.6 The overall housing trajectory for the plan period is set out at Figure 4. The trajectory shows that, adding the Borough Plan allocations, the housing delivery is expected to exceed the cumulative requirements up until 2029/30. Housing delivery would be in deficit against cumulative requirements for the final two years of the plan. It is anticipated that the JCS review will be adopted by late 2023. It is therefore considered that the shortfall will be addressed through the JCS review within the necessary timeframe. It is proposed that this Housing Trajectory be inserted as a new 3.22 in the Borough Plan to set out what has been delivered against the JCS requirement, and what will be delivered over the remaining Plan period. This would be a main modification which would clarify the Tewkesbury Borough Council's approach to housing delivery over the plan period.

Figure 4 - Overall Housing Trajectory (2011-2031) - including Tewkesbury Borough Plan allocations

Year	Completions & Commitments	Mitton Delivery	Borough Plan Delivery	Total and Projected Completions	Cumulative Completions	Plan - Annual Housing Requirement	Plan - Cumulative Housing Requirement	Monitor - number of dwellings above or below cumulative requirement
2011-12	319			319	319	495	495	-176
2012-13	463			463	782	495	990	-208
2013-14	517			517	1299	495	1485	-186
2014-15	567			567	1866	495	1980	-114
2015-16	630			630	2496	495	2475	21
2016-17	730			730	3226	495	2970	256
2017-18	933			933	4159	495	3465	694
2018-19	981			981	5140	495	3960	1180
2019-20	439			439	5579	495	4455	1124
2020-21	612			612	6191	495	4950	1241
2021-22	121		165	286	6477	495	5445	1032
2022-23	176		310	486	6963	495	5940	1023
2023-24	198	25	311	534	7497	495	6435	1062
2024-25	196	50	71	317	7814	495	6930	884
2025-26	196	100	25	321	8135	495	7425	710
2026-27	186	100	50	336	8471	495	7920	551
2027-28	146	100	40	286	8757	495	8415	342
2028-29	146	125	25	296	9053	495	8910	143
2029-30	146		25	171	9224	495	9405	-181
2030-31	146		0	146	9370	495	9900	-530

Question

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

TBC Response

- 2.3.1 A planning application for a 500 dwelling scheme at Mitton has been submitted to Wychavon District Council (18/00771/OUT) and is pending determination. The application is currently subject to a 3 month holding objection from Highways England (dated 15th December 2020) in order to provide the applicant with sufficient time to address outstanding concerns regarding the development's traffic impact on the strategic road network. Officers at Wychavon District Council advise that significant progress has been made towards addressing this objection but traffic modelling work is still ongoing in relation to the impact on the network. It is anticipated that the application will go to Wychavon District Council's Planning Committee for determination in May 2021, subject to timely resolution of the outstanding highways issues.
- 2.3.2 The housing trajectory at Figure 4 shows that the site will start to deliver houses in the 2023-24 monitoring year. On the premise that Outline Planning Permission is granted in summer 2021 with Reserved Matters Approval in summer 2022, it is considered that the trajectory for the site at Figure 4 is achievable.
- 2.3.3 A planning statement agreed between Wychavon District Council and Tewkesbury Borough Council in September 2017 establishes an agreement to co-operate over the principle of development on this site contributing 500 homes towards the needs of Tewkesbury Borough. This statement is attached to this response at Appendix 2.
- 2.3.4 Subsequent to this, through the review of the South Worcestershire Development Plan, (SWDP) a site at Mitton was identified in the Preferred Options consultation published in November 2019. The Preferred Options document proposes to allocate a site at Mitton for an indicative capacity of 1,000 dwellings. However, the SWDP continues to commit that 500 of these dwellings would be to meet the needs of Tewkesbury Borough. The relevant part of the Preferred Options SWDP is attached to this response at Appendix 3¹. The site at Mitton features at Table 19 within the document.

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?

¹ A full copy of the Preferred Options SWDP can be viewed at [SWDP Review Preferred Options Consultation - Wychavon District Council](#)

TBC Response

- 2.4.1 The 2015 Settlement Audit has been refreshed prior to submission of the Tewkesbury Borough Plan. The most recent Joint Core Strategy Rural Area Settlement Audit Refresh was published in July 2017.
- 2.4.2 The full contents of the 2017 Refresh be found here:
<https://www.tewkesbury.gov.uk/planning-policy-evidence-base#jcs-settlement-audit>
- 2.4.3 The results of the reports provide an understanding of the characteristics and roles of settlements and a simple quantitative means to distinguish between them. To best interpret the results of the 2017 Settlement Audit Refresh and determine whether any changes to the settlement hierarchy would be justified; the following paragraphs and accompanying table below will compare the overall scores of all settlements in the Tewkesbury Borough area within the 2017 Settlement Audit Refresh and if and how these have changed since the 2015 Settlement Audit.
- 2.4.4 We consider that those named settlements which have changed by more than 10 places within the overall ranking are a relative significant change. Justifications for these ranking scores increasing or decreasing are contained within the table below.

Table 1. Comparison and justification of changes in overall ranks of the 75 named settlements between the 2015 Settlement Audit and 2017 Settlement Audit Refresh.

Named Settlements	Overall Rank 2015 Settlement Audit	Overall Rank 2017 Settlement Audit	Change in Rank	Justification for 'significant' Change
Alderton	19	20	-1	
Alstone	55	58	-3	
Apperley	33	32	1	
Ashchurch	10	9	1	
Ashleworth	19	22	-3	
Aston Cross	59	37	22	Major employment area access by road/car score change
Aston-on-Carrant	59	58	1	
Badgeworth	44	50	-6	
Barrow	64	68	-4	
Bentham	46	50	-4	
Bishop's Cleeve	2	2	0	
Boddington	55	58	-3	
Brockhampton	28	39	-11	Major employment area access by road/car and public transport scores change
Brockworth	4	6	-2	
Buckland	64	64	0	
Chaceley	48	50	-2	

Chargrove	19	36	-17	Loss of children's play area, Major employment area access by road/car and public transport scores change
Charlton Abbotts	69	68	1	
Churchdown	2	4	-2	
Coombe Hill	28	22	6	
Deerhurst	55	47	8	
Deerhurst Walton	48	39	9	
Didbrook	48	58	-10	Major employment area access by road/car score change
Down Hatherley	31	27	4	
Dumbleton	37	37	0	
Elmstone Hardwicke	19	29	-10	Major employment area access by road/car and public transport scores change
Fiddington	28	32	-4	
Forthampton	41	39	2	
Gotherington	13	16	-3	
Great Washbourne	74	74	0	
Great Witcombe	44	47	-3	
Greet	33	20	13	Major employment area access by road/car and public transport scores change
Gretton	33	29	4	
Hardwicke	33	39	-6	
Hasfield	69	68	1	
Hawling	69	68	1	
Highnam	7	7	0	
Hucclecote	15	18	-3	
Innsworth	7	8	-1	
Laverton	59	63	-4	
Little Witcombe	41	39	2	
Longford	12	12	0	
Maisemore	15	16	-1	
Minsterworth	19	22	-3	
Northway	5	5	0	
Norton	27	29	-2	
Oxenton	48	50	-2	
Pamington	55	50	5	
Prescott	69	64	5	
Priors Norton	59	64	-5	
Sandhurst	37	39	-2	
Shurdington	7	12	-5	
Shuthonger	64	58	6	
Snowhill	48	50	-2	
Southam	37	34	3	

Stanton	48	50	-2	
Stanway	59	64	-5	
Staverton	41	34	7	
Stoke Orchard	17	10	7	
Teddington	46	47	-1	
Tewkesbury	1	1	0	
The Leigh	64	39	25	Major employment area access by road/car and public transport scores change, addition of access to library
Tirley	48	50	-2	
Toddington (incl. New Town)	25	25	0	
Tredington	37	25	12	Major employment area access by road/car and public transport scores change
Twigworth	25	19	6	
Twyning	19	12	7	
Uckington	14	27	-13	Major employment area access by road/car and public transport scores change
Walton Cardiff	31	39	-8	
Wheatpieces	11	12	-1	
Winchcombe	6	3	3	
Wood Stanway	74	74	0	
Woodmancote	17	10	7	
Woolstone	69	68	1	
Wormington	64	68	-4	

2.4.5 The named settlements whose overall rank has changed significantly that are also within the Settlement Hierarchy as Rural Service Centres, Rural Service Villages or Urban Fringe Settlements are –

- The Leigh/Coombe Hill
-

2.4.6 The named settlements whose overall rank has risen significantly but are not designated as a Rural Service Centre or Rural Service Village are –

- Aston Cross
- Brockhampton
- Chargrove
- Didbrook
- Elmstone Hardwicke
- Greet
- Tredington
- Uckington

- 2.4.7 The named settlements above that have changed in their overall rank are mainly due to changes in accessibility score, particularly in terms of major employment area access by public transport and road/car. It should be noted that these changes are only slight however their minuity contributes to the enlarged scale of change due to the comparative overall minimal changes for all named settlements.
- 2.4.8 The criteria for which the settlements are assessed under, primary services and secondary services remains heavily unchanged for all named settlements, even for those with a considered 'significant' change in overall ranking.
- 2.4.9 Those settlements named as Rural Service Centres, Service Villages and Urban Fringe Settlements have remained stable in their overall rank between 2015 and 2017 and therefore carry the same status as when the settlement hierarchy was determined.
- 2.4.10 Therefore, we remain of the consideration that despite a change in ranking for a number of settlements from 2015 to 2017; that the current settlements are justified with their designation as a Rural Service Centre within the overall settlement hierarchy.

Question

- 2.5 Is the methodology used for identifying housing sites in the TBP, as described in the Housing Background Paper (HBP), appropriate? (This is not an opportunity to discuss the merits of individual allocations which will be considered under Matter 3).**

TBC Response

- 2.5.1 The methodology for identifying sites in the TBP, as set out in the Housing Background Paper 2019 (HBP), is based on Policy SP2 of the JCS (Distribution of New Development) and the presumption in favour of sustainable development set out within the National Planning Policy Framework (NPPF).
- 2.5.2 Policy SP2(8) states that any additional site allocations made through a local plan or any neighbourhood plans must be in conformity with the JCS spatial strategy (set out at Policy SP2).
- 2.5.3 Policy SP2(5) provides a specific framework for the assessment of sites at the RSCs and SVs. It states that the RSCs and SVs 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 including existing levels of growth over the plan period.
- 2.5.4 The starting point for identifying sites at the RSCs and SVs is the disaggregation process set out at Appendix D of the HBP. This, guided by the framework at Policy SP2(5), disaggregates the housing requirements for the RSCs and SVs set out at Policy SP2 amongst the individual settlements based on their size, function and their proximity and accessibility to Cheltenham and Gloucester. An indicative housing requirement is provided for each settlement based on these criteria. This identifies the general levels of development that could be sustainably accommodated at each settlement.

- 2.5.5 Allocations at Tewkesbury town are not subject to the SP2 requirement for allocations to be proportional to its size/function/accessibility to Cheltenham and Gloucester but, in the interests of promoting sustainable development, it is still appropriate to ensure that allocating sites at the town would not result in adverse social, economic, and environmental impacts.
- 2.5.6 The next step was to identify available sites that are located adjacent to the RSCs and SVs. This predominately involved sites included within the Council's Assessment of Land Availability (ALA) but also includes Council owned land that is available for development, 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.
- 2.5.7 A desktop assessment was then carried out for each available site. Each site was considered against the following criteria:
- **Strategy** - The site needs to fit within the broad strategy for locating development as required in the Submission JCS Policy SP2
 - **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) in such a way as to make development of the land unacceptable?
 - **Policy constraints** - Is the site designated as Green Belt land, or is it designated in an adopted plan as a 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? Are the impacts capable of mitigation?
- 2.5.8 These criteria are based on the JCS spatial strategy, national planning policy guidance within the NPPF and relevant local policy constraints.
- 2.5.9 Following this initial sieving process, for those sites which were considered to have development potential, further evidence was gathered (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 consider technical evidence, observations on site and any comments/concerns raised by specialist officers.
- 2.5.10 The final stage of the site assessment process was to consider the implications of allocating the sites considered to be potentially developable after the process described above had been followed. Not all sites considered to be potentially developable were included as site

allocations as in some cases it was not appropriate to promote further growth at the respective settlements (i.e. due to the cumulative effect of previous commitments and/or the presence of a 'made' Neighbourhood Development Plan) or national planning policy indicated that the sites should not be allocated (i.e. Green Belt sites where exceptional circumstances are not demonstrated).

- 2.5.11 The housing site allocations in the Pre-submission TBP are the result of an iterative process. Following the (Regulation 18) preferred options consultation a number of additional sites had become available for development and had been demonstrated to be developable and deliverable through the planning application process. The Council has also received submissions on behalf of developers and has commissioned feasibility studies in respect of certain sites that were previously dismissed due to uncertainties over their deliverability. Furthermore, a number of additional sites had been promoted through the preferred options consultation. All of these sites were considered for inclusion in the Pre-submission TBP using the site assessment process explained above.
- 2.5.12 A balanced approach has been followed for assessing the suitability of the sites in accordance with the NPPF's presumption in favour of sustainable development (paragraph 11). Local Plans are expected to meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
- 2.5.13 The site assessment methodology set out in the HBP is considered to be robust and appropriate. It is based on the JCS spatial strategy and national planning policy guidance within the NPPF. It draws on the Council's evidence base and includes practical considerations in relation to conditions on the ground. The HBP has enabled TBC to demonstrate that the housing site allocations in the TBP are 'developable' as defined in the NPPF.

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?**

TBC Response

- 2.6.1 The JCS identification of a further 315 dwellings for the Tewkesbury Borough Plan was based, at the time, on the remaining balance from the housing requirements for the RSCs and SVs at Policy SP2 (1860 and 880 dwellings respectively) that hadn't already been committed at the time of JCS's adoption.
- 2.6.2 The TBP will provide for some 1,022 uncommitted dwellings which would meet and exceed the required contribution of 315 dwellings set out in the JCS.

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?

TBC Response

- 2.7.1 With regard to Tewkesbury town, the JCS states at paragraph 3.2.13 that beyond Gloucester, Cheltenham and the Strategic Allocations, further development potential will be accommodated within Tewkesbury Borough. Tewkesbury town, in accordance with its role as a market town, will deliver development. This is reflected at Policy SP2(4) which states that development will be provided at Tewkesbury town in line with its role as a market town. Although there is not a specific housing requirement for Tewkesbury Town identified within the JCS, allocations at the town were considered within the context of the JCS plan period shortfall. Tewkesbury is the largest and most sustainable settlement within the Borough and is the second most important tiered location in the JCS settlement hierarchy, after Gloucester and Cheltenham. The Tewkesbury town area is therefore the Council's preferred location for meeting the Borough's housing shortfall and the non-strategic sites proposed to be allocated in the TBP will make a contribution towards addressing this.
- 2.7.2 The TBP proposes to allocate four sites at Tewkesbury town providing up to 330 new dwellings. Site TEW2 (Land adjacent to John Moore Primary School, Wheatpieces) has now received full planning permission for 30 dwellings although construction work has not yet commenced. Sites TEW3 and TEW4 relate to brownfield sites within Tewkesbury town centre and they feature as key development opportunities in the Tewkesbury Town Regeneration Supplementary Planning Document (SPD) (March 2019). Delivering borough regeneration schemes is one of the priorities and objectives within the Tewkesbury Borough Council Plan 2020-24. Site TEW1 is a greenfield site and its development would involve a modest extension to the town. All of these sites were planned within the context of the JCS shortfall for Tewkesbury of some 2,454 dwellings (at the time of adoption) and to deliver on Council priorities within the Tewkesbury Borough Council Plan and Tewkesbury Town Regeneration SPD.
- 2.7.3 The allocations at Tewkesbury town are considered to be justified and the plan is considered to be positively prepared in this respect. The site allocations will help to meet the Borough's objectively assessed housing need in accordance with the JCS spatial strategy, as appropriate for a second tier (non-strategic) plan and will deliver on the Council's corporate priorities.

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?

TBC Response

- 2.8.1 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.
- 2.8.2 The JCS identifies rural service centres and service villages as places where lower levels of development are expected to be accommodated. The starting point for the distribution of development in the rural areas was drawn from evidence set out within the Settlement Audit.
- 2.8.3 Rural service centres are considered to be those settlements within the JCS area that have a wide enough range of existing services and/or facilities, to fulfil most of the day-to-day needs of local residents, surrounding settlements and rural areas. Furthermore, such settlements also benefit from a degree of accessibility to major employment areas, either by road/car and public transport, together with relatively good bus service provision.
- 2.8.4 There are two settlements defined in the JCS as rural service centres: Bishop's Cleeve and Winchcombe, which offer a higher range of services and facilities within the rural areas. Over the plan period to 2031 the rural service centres will accommodate in the order of 1860 new homes.
- 2.8.5 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. Sites went through a rigorous site assessment process of which is further explained in the housing background paper (Examination Document EB013).
- 2.8.6 The allocations at Rural Service Centres and Service Villages are considered to be justified and the plan is considered to be positively prepared in this respect. The site allocations will help to meet the Borough's objectively assessed housing need in accordance with the JCS spatial strategy, as appropriate for a second tier (non-strategic) plan.

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?**

TBC Response

- 2.9.1 As noted above, 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.
- 2.9.2 The JCS identifies rural service centres and service villages as places where lower levels of development are expected to be accommodated. The starting point for the distribution of development in the rural areas was drawn from evidence set out within the Settlement Audit.
- 2.9.3 There are a number of freestanding villages defined in the JCS as service villages, which have some transport accessibility, two or more primary services and two or more secondary services, as identified in the settlement audit. The retention of these services is in part linked to the size and distribution of the resident population, although some are reliant on passing trade, and it is important that these services remain viable.
- 2.9.4 The following Service Villages are set out within the JCS; Alderton, Coombe Hill, Gotherington, Highnam, Maisemore, Minsterworth, Norton, Shurdington, Stoke Orchard, Toddington (inc. Newtown), Twyning and Woodmancote. Over the plan period the service villages will accommodate in the order of 880 new homes.
- 2.9.5 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. Sites underwent a rigorous site assessment process of which is further explained in the housing background paper.
- 2.9.6 The allocations at Rural Service Centres and Service Villages are considered to be justified and the plan is considered to be positively prepared in this respect. The site allocations will help to meet the Borough's objectively assessed housing need in accordance with the JCS spatial strategy, as appropriate for a second tier (non-strategic) plan.

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?**

TBC Response

- 2.10.1 The process upon which sites were identified is detailed in this response to question 2.5. In

particular, notably the methodology for identifying sites in the TBP, as set out in the Housing Background Paper 2019 (HBP), is based on Policy SP2 of the JCS (Distribution of New Development) and the presumption in favour of sustainable development set out within the National Planning Policy Framework (NPPF). Policy SP2(8) states that any additional site allocations made through a local plan or any neighbourhood plans must be in conformity with the JCS spatial strategy (set out at Policy SP2). The allocation of the sites at Brockworth were considered justified as they were both subject to a resolution to grant planning permission, the sites were in a sustainable location; they were in accordance with Policy SP2 of the JCS, and the allocation of the sites therefore provided assurance in the planning process and helped to meet the overall housing requirement for the area.

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?

TBC Response

2.11.1 Figure 5 below sets out the five-year supply position for Tewkesbury Borough from 2020/21 to 2024/25 but with inclusion of 857 dwellings of supply from emerging Borough Plan sites. With the inclusion of the Borough Plan allocations the council would be able to demonstrate a 7.27 years supply with a surplus of 644 dwellings in accordance with the trajectory (Figure 6) .

Figure 5	DWELLINGS	TOTALS
1. Previous Delivery (2011/12 to 2019/20)		
JCS Requirement = 495 dwellings x 9 years	4,455	
Actual Delivery	5,579	
Surplus		1,124
2. Requirement (2020/21 to 2024/25)		
JCS Requirement = 495 dwellings per annum x 5 years	2,475	
Total Requirement (minus previous surplus – 1,124)	1,351	
Total Including 5% NPPF Buffer		1,419
3. Deliverable Supply (2020/21 to 2024/25)		

A - Major Sites with (10+) with a detailed planning permission	474 ²	
B - Non-major sites (5-9) with outline or detailed planning permission	138	
C - Major Sites (10+) with an outline planning permission	375	
D - Dwellings on small sites (0-4) with permission (extant permission incl. 78% implementation rate)	81	
E - Small site windfall allowance	138	
F – Emerging Tewkesbury Borough Plan Allocations	857	
Total Deliverable Supply		2063
4. 5 Year Supply Calculation		
(Deliverable Supply/Total Requirement) x 5 Years		
<u>0% Buffer</u>	<u>5% Buffer</u>	
153% Supply	145% Supply	
7.64 Years Supply	7.27 Years Supply	
+712 dwellings	+644 dwellings	

2.11.2 The below figure 6 shows the projected commitments and how these meet the JCS cumulative requirement of 495 per annum. In the final column named ‘monitor – number of dwellings above or below cumulative requirement, where highlighted in green, these are years where the number of dwellings meet or exceeds the cumulative requirement. It is expected that with the current data available, Tewkesbury Borough Council will have a 5 year housing land supply up until 2029.

² The [Five year housing land supply statement \(December 2020\) includes a deliverable supply of 501 dwellings from this source.](#) This has been reduced by 27 dwellings at Table 4 as there is overlap between TBP allocation BRO1 (166 dwellings) and permission ref. 08/01461/FUL (Brockworth District Centre - Whittle Square, Plot 5030). [There are 27 unimplemented dwellings from 08/01461/FUL](#) that relate to the same site area as BRO1.

Figure 6

Year	Completions & Commitments	Mitton Delivery	Borough Plan Delivery	Total and Projected Completions	Cumulative Completions	Plan - Annual Housing Requirement	Plan - Cumulative Housing Requirement	Monitor - number of dwellings above or below cumulative requirement
2011-12	319			319	319	495	495	-176
2012-13	463			463	782	495	990	-208
2013-14	517			517	1299	495	1485	-186
2014-15	567			567	1866	495	1980	-114
2015-16	630			630	2496	495	2475	21
2016-17	730			730	3226	495	2970	256
2017-18	933			933	4159	495	3465	694
2018-19	981			981	5140	495	3960	1180
2019-20	439			439	5579	495	4455	1124
2020-21	612			612	6191	495	4950	1241
2021-22	121		165	286	6477	495	5445	1032
2022-23	176		310	486	6963	495	5940	1023
2023-24	198	25	311	534	7497	495	6435	1062
2024-25	196	50	71	317	7814	495	6930	884
2025-26	196	100	25	321	8135	495	7425	710
2026-27	186	100	50	336	8471	495	7920	551
2027-28	146	100	40	286	8757	495	8415	342
2028-29	146	125	25	296	9053	495	8910	143
2029-30	146		25	171	9224	495	9405	-181
2030-31	146		0	146	9370	495	9900	-530