

Our Ref: SH/pl

26 January 2021

Mr Ian Kemp
Tewkesbury Borough Council
Gloucester Road
Tewkesbury
GL20 5TT

Fisher German LLP
Global House
Hindlip Lane
Worcester
WR3 8SB

01905 728 444
worcsrural@fishergerman.co.uk
fishergerman.co.uk

By email:

Dear Mr Kemp

Tewkesbury Borough Local Plan representation on behalf of the Forthampton Estate

Fisher German LLP have been instructed to make formal representation to the Tewkesbury Borough Council in relation to the list of matters, issues and questions for the Tewkesbury Borough Local Plan dated 16th December 2020. The representation is not to be seen as a wider consideration of the matters, issues and questions list and is only focused on matters of material interest to the Forthampton Estate. As such this letter will provide considered response matter 3A (allocations outside the Green Belt) question 3.3 and matter 6 (general housing policies), question 6.2 policy RES4.

Matter 3A (allocations outside the Green Belt) question 3.3

The examination inspector has set out a number of general and 1 site specific question for response. I provide response to each in turn below -

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

The site is presently made up of an agricultural yard and agricultural land. There is no planning history relevant to the matter site allocation.

If planning permission has already been granted or is there 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?

N/A

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?

As outlined in the Tewkesbury Borough Local Plan Housing Background Paper (2018) this allocation is brought forward as a result of a general community aspiration to establish further housing within the village. It is therefore not directly in accordance with the site selection criteria for housing allocations, however, the Forthampton Estate are in agreement with the Tewkesbury Borough Council that the allocation can be seen to broadly accord with the emerging provisions of RES3 which permit development through local initiatives. On balance the proposed selection of the allocation should be considered acceptable.

The primary site constraints are seen to be the Forthampton Conservation Area and Landscape Protection Zone. These constraints are not considered to derive any in principle objections to the matter of housing development. This assertion is supported by the additional heritage impact assessment undertaken by Tewkesbury Borough Council, ref EB007a, which confirms that the allocation can be brought forward without harming the key features of the Conservation Area.

The emerging policy provision for the Landscape Protection Zone within policy LAN2 does not oppose development in principle. Any development brought forward would need to consider LAN2 as a material planning consideration. This provides the proposed allocation with sufficient protection to ensure the ecology and visual amenity of the river environment is not adversely harmed by the future development of the allocation.

There are no development infrastructure requirements that would prevent the allocation from coming forward.

The Forthampton Estate are in a position to bring forward the development within 5 years of the plan adoption.

Is the indicative capacity figure for the allocation justified?

Yes, it is considered that the indicative capacity for the site is acceptable and will mirror the local density of development seen in the existing settlement and other rural localities.

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

Yes, the site-specific policy picks up on the primary site constraints as mentioned above. This will direct development design accordingly and ensure the appropriateness of any proposed housing scheme.

Allocation specific question – Forthampton

At the time of the submitting the site for consideration the Forthampton Estate had received a letter confirming the support of the Parish Council. Notwithstanding this more recent correspondence from the members of the Parish Council, the Forthampton Estate would highlight that a Housing Needs Survey has been commissioned by Tewkesbury Borough Council with the assistance of Gloucestershire Rural Community Council (GRCC).

Having reviewed and discussed the initial findings with the GRCC it is clearly indicated that there is a community desire from residents of the parish for a small development of new build housing. It is requested that the formal findings of the housing needs report (2020) form part of the overall consideration of community desire.

Whilst emerging policy RES4 could also provide policy support for the residential development of the site, the policy as presently worded is far more limiting in its consideration of settlement growth which conflicts with the aspirations of the Forthampton Estate and emerging local need within the GRCC housing needs survey. The Forthampton Estate would therefore seek to have the site remain a formal housing allocation to support this emerging need.

Additionally, it should be highlighted that Forthampton Estate are fully committed to providing development of exceptional design quality that will complement the architectural aesthetic of the village and enhance the immediate biodiversity and landscape character. The Estate are in full agreement with the site-specific policy requirements currently proposed.

Based on the above it is considered that the allocation is sound and broadly accords with the provisions of the paragraph 35 of the NPPF.