

TEWKESBURY BOROUGH PLAN EXAMINATION – LIST OF MATTERS, ISSUES AND QUESTIONS – 16TH DECEMBER 2020

MATTER 3:

HOUSING ALLOCATIONS AND SETTLEMENT BOUNDARIES

ON BEHALF OF: ROBERT HITCHINS LTD

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Introduction

Pegasus is instructed by Robert Hitchins Ltd to submit a Statement in respect of Matter 3, pursuant to the Matters and Questions identified by the Examination Inspector.

Separately additional Statements have been submitted in respect of the following Matters:

- Matter 1
- Matter 2
- Matter 6
- Matter 7

Pegasus previously submitted representations in response to the Reg 19 Pre-Submission Plan in November 2019 and the Preferred Options Consultation in November 2018. The Hearing Statements should be read alongside our representations and supporting evidence.

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3. **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**

Questions:

Matter 3A: Allocations outside the Green Belt

- 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?**

3.1.1 The extent of Northway/Ashchurch area is not defined in the TBP (CD001). Paragraph 2.11 of CD001 refers to the Borough Council commissioning a consultant team to undertake masterplanning work for the Ashchurch area to inform the JCS review. A Concept Masterplan (at the time of writing it is not on the Core Document List) was produced by the consultant team in January 2018, (it identifies a study area) and appeared as part of the consultation on the JCS Issues and Options in October 2018 (DP002). The area has been awarded Garden Town status, according to the website the concept masterplan is only indicative at this stage and area is to be considered in the JCS Review.

3.1.2 When the JCS was adopted in December 2017 there was to be an immediate review of the housing land supply in Tewkesbury to rectify the plan period shortfall. Policy REV1 was included in the JCS because it was known that there would be shortfalls in housing provision in Gloucester and Tewkesbury by the end of the plan period. Policy REV1 was intended to force an immediate partial review of the JCS to address this. However, housing delivery problems have also arisen in Cheltenham and the JCS Authorities have abandoned the partial review in favour of a comprehensive review of the JCS. Paragraph 2.5 of DP002 states that,

“it is considered that the JCS review needs to consist of a comprehensive review of the plan, including the housing requirements and supply for all three authorities as well as the suite of policy guidance.”

3.1.3 A consultation took place on the issues and options in October 2018, however, since then no further progress had been made and there is no up-to-date published timetable for the review. It is noted EXAM001A para 2.1 refers to a timetable being published as soon as possible.

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?

3.2.1 This is a question more appropriate for the Council.

3.3 Considering each Policy RES1 site in turn:

3.3.1 The responses to this question respond to Policy FOR1 – Land at corner of Bishops Walk and School Lane. All other questions are addressed in our joint response to this Matter with Vistry Group.

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

• 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?

3.3.2 This is a matter for the Council.

• 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?

• Is the indicative capacity figure for the allocation justified?

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

3.3.3 The housing allocation appears to inconsistent with the approach taken to the identification of sites proposed in CD001. EB013 refers to this in paragraph 5.20, but the justification appears to be that the site for 10 dwellings is proposed as it relates to a community driven proposal.

3.3.4 Whether or not this is an effective and efficient use of land is to some degree a separate question, however, it appears that the principle has been established that sites outside of a defined settlement can be allocated, despite the policy approach defined in the JCS.

3.3.5 As Policy RES1 proposes allocations in the Rural Service Centres and some six of the twelve Service Villages, the proposed allocation to Forthampton appears as an anomaly as no other small settlements are included. What is the justification for this settlement to have an allocation in the plan as opposed to other settlements. The approach appears to conflict with para 3.3 of the Plan CD001 which states that:

“The JCS settlement hierarchy for Tewkesbury Borough includes Tewkesbury Town as the top tiered settlement followed by the two Rural Service Centres and then the 12 Service Villages. The Rural Service Centre and Service Village classification was informed by the JCS Settlement Audit (2017). These are the locations at which housing land allocations will be made through the Tewkesbury Borough Plan.”

3.3.6 Paragraph 3.4 goes on to state that the Council recognises that some small scale opportunities for new housing will be necessary in order to support the vitality of communities at other rural settlements across the Borough. This is addressed by Policy RES4 New Housing at other rural settlements.

Forthampton

FOR1 – Land at corner of Bishops Walk and School Lane

• Forthampton is not a Service Village and has a limited range of services and facilities. HBP paragraph 9.3 states the allocation is locally driven with the support of the local community. However, in response to the Regulation 19 consultation the Parish Council do not support the allocation. In this light, is the allocation justified? As an alternative, would Policy RES4 provide a suitable basis for considering any scheme that comes forward?

3.3.7 The justification for the policy appears in paragraph 9.3 of EB013 which explains that the allocation is locally driven to meet community aspirations.

3.3.8 However, this does not appear to be the case when the representations of Forthampton Parish Council ID 503 are read. The letter sent in 2018 to support the promotion of the site by Forthampton Estates represented by Fisher German was not agreed by the Parish Council. The representations to the Pre-Submission Plan in 2019 submitted by the Parish Council make it clear that the proposed allocation is not supported by the Parish Council, neither is the need for housing supported by the Parish Plan.

3.3.9 CD006 reference VI_68/139 provides the SA of the site and it is noted that there are limited facilities at Forthampton and residents are likely to travel to Tewkesbury some 5km to the east and therefore unlikely to reduce reliance on the private vehicle. Development of the site has the potential to increase traffic and emissions, but in CD006 this is dismissed as the SA concludes there will be “no significant negative effects: potential for a residual neutral effect against SA Objective 6.” The site is located within a Landscape Protection Zone, but this is dismissed as potential neutral effects against SA Objective 11, but some uncertainty is acknowledged in respect of visual impacts and their mitigation, together with historic character of the village.

3.3.10 CD006 concludes VI_70/139:

“Although the site option does not have good access to bus connections and is unlikely to reduce reliance on the private vehicle given the limited services and facilities in the settlement, only a small number of new dwellings are proposed. No significant issues were identified against other topics; specific mitigation may be needed to avoid adverse effects on the character of the historic village and the Conservation Area.”

3.3.11 In view of the above the proposed allocation is not justified and RES4 would provide a suitable basis for considering any scheme which may come forward. There are other sites in sustainable locations, which consistent with the settlement strategy that can be considered to meet the shortfall in housing land supply.

Matter 3B: Settlement Boundaries outside the Green Belt

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

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).

3.4.1 Pegasus has no comments on this question.

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

3.5.1 Pegasus has no comments on this 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?

3.6.1 Our comments in respect of this question are the same as those set out in the joint Hearing Statement on behalf of Robert Hitchins Ltd and Vistry Group.

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?

3.7.1 Our comments in respect of this question are the same as those set out in the joint Hearing Statement on behalf of Robert Hitchins Ltd and Vistry Group.

Urban Fringe Settlements

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? (eg land west of Cockroft Lane, north of Grovefield Way, north of Leckhampton Lane)

3.8.1 Pegasus has no comments on this 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?

3.9.1 Pegasus has no comments on this question.

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

Shurdington

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

3.10.1 This a question best addressed by the Council.

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?

3.11.1 Our comments in respect of this question are the same as those set out in the joint Hearing Statement on behalf of Robert Hitchins Ltd and Vistry Group.

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?

3.12.1 Our comments in respect of this question are the same as those set out in the joint Hearing Statement on behalf of Robert Hitchins Ltd and Vistry Group.

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?

3.13.1 This question is best addressed by the Council in defending the proposals in the Plan.

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?

3.14.1 This question is best addressed by the Council in defending the proposals in the Plan.

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

3.15.2 These questions are best addressed by the Council in defending the proposals in the Plan.

In turn:

SHU1 – Land at corner of Badgeworth Lane and A46

3.15.3 This question is best addressed by the Council in defending the proposals in the Plan.

SHU2 – Land north of Leckhampton Lane

3.15.4 This question is best addressed by the Council in defending the proposals in the Plan.

SHU3 – Garage site at Harrison (not in the Green Belt)

3.15.5 This question is best addressed by the Council in defending the proposals in the Plan.