

Tewkesbury Borough Plan Examination

Additional comment further to our principal submission concerning the soundness of proposed policies GRB1, RES1 and RES2 with specific reference to land at Buttermilk Lane, Churchdown (ID 217).

Matter 3 Housing Allocations and Settlement Boundaries

Q 3.9

Irrespective of the issue of whether non-strategic allocations should be assessed at urban fringe settlements, the Borough Plan should have been all encompassing in its reviews of settlement boundaries. There is no documented evidence that any review has taken place for the urban fringe settlement of Churchdown.

The principal criteria cited for the review of the Shurdington settlement boundary were the sustainability of the site in the context of paragraph 138 of the NPPF, and also the evidence contained in the Green Belt Partial Review 2017. The evidence contained in the Review with respect to the Buttermilk Lane site in Churchdown is set out at paragraphs 3.12 to 3.15 of our principal submission and is at least as compelling in support of the removal of the site from the Green Belt as in the case of the Shurdington sites. The approach to settlement boundary reviews does not therefore appear to have been followed consistently.