



The countryside charity  
Gloucestershire

24 January 2021

## **Tewkesbury Borough Plan Examination**

### **Response to Matters, Issues and Questions**

#### **By the Campaign to Protect Rural England, Gloucestershire**

#### **Introduction**

CPRE Gloucestershire welcomes the opportunity to address the questions set by the Inspector and thereby supplement its earlier representations. In the interests of brevity we have confined our response to those questions which we consider most relevant and urgent, and do not repeat the representations already submitted; instead, cross references are made. As requested, we set out below our comments under the individual 'Matters' specified by the Inspector, with each Matter beginning on a separate page. However, many of what we regard as the crucial issues are inter-related, and all our representations, like local plans, should be read as whole.

#### **Conclusion**

Consideration of the most relevant and urgent questions alone, as set out below lead CPRE to conclude that the Tewkesbury Borough Plan is unsound.

Registered Office  
Community House  
15 College Green  
Gloucester  
GL1 2LZ  
info@cpreglos.org.uk  
cpreglos.org.uk

President  
Charles Martell  
Chair  
Patricia Broadfoot CBE  
Director  
Louise Williams

### **Matter 3: Housing allocations and settlement boundaries**

#### **Question 3.3**

Policy RES1/Site WIN1

CPRE objected to the allocation of this site in its earlier representations. In relation to the questions now set, we consider that this would indeed constitute major development in the AONB, there are no exceptional circumstances which would justify it, and it is not in the public interest; nor would the proposal conserve and enhance landscape and scenic beauty in the AONB.

#### **Question 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).*

None of these villages is defined as a service village and none has a housing allocation in the TBP. It does not follow however that a settlement boundary is unnecessary or inappropriate. CPRE considers that in these cases it is just as important that villages without an allocation have a defined settlement boundary. Throughout rural England, this is the almost universally used policy tool to indicate where development will on the whole be permitted and where it will not. We consider that the phrase “*within and adjacent to the built up area of other rural settlements*” in the first sentence of Policy RES4 does not create sufficient certainty, and provides insufficient protection, for those villages. CPRE strongly recommends that the 2006 boundaries be again applied to them.

#### **Question 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?*

In the case of Coombe Hill, CPRE is aware that an appeal (PINS reference 3257625) against the refusal of an outline planning application on the land depicted as Site A has been postponed. We believe that Coombe Hill should not have been identified as a Service Village in the first place. However, if the appeal succeeds it will at least provide the opportunity at the reserved matters stage to create a proper settlement where none

exists at present. We consider the approach to the settlement boundary to be appropriate in the circumstances.

In the case of Minsterworth, sporadic built development occurs over a great distance alongside the A48. We consider it appropriate that the settlement boundaries cover the most coherent of the developed areas.

**Question 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?*

CPRE objected to the allocation of these sites in its earlier representations. The additional provision for housing since late 2019 in the service villages weakens further any case for the allocation of these sites.