



MATTER 3C EXAMINATION STATEMENT

CLAREMONT PLANNING ON BEHALF OF

EUROPEAN PROPERTY
VENTURES(GLOUCESTERSHIRE) LTD

ALLOCATIONS & SETTLEMENT
BOUNDARIES IN THE GREEN BELT



This Statement for Matter 3C: Allocations & Settlement Boundaries in the Green Belt will seek to address the Inspector's Questions identified below:

Shurdington

- 3.10 When was the Green Belt inset boundary for the settlement first defined and has it been reviewed subsequently?
- 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?
- 3.12 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?
- 3.13 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?
- 3.14 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?
- 3.15 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?



Matter 3C – Allocations & Settlement Boundaries in the Green Belt

1. Introduction

1.1 Claremont Planning Consultancy Ltd (Claremont Planning) previously provided responses to the Council's emerging Local Plan on behalf of European Property Ventures Gloucestershire Ltd (EPV). The representations were in respect of the Council's approach to allocations for housing, raising concerns that the Council had not allocated sufficient sites in the emerging Local Plan to appropriately deal with housing needs. In particular, they emphasised the potential to allocate additional sites at Shurdington including the site promoted by EPV, as suitable, available and deliverable to meet Tewkesbury's housing needs.

2. Green Belt Inset Boundary (Q3.10)

2.1 Based on the information provided in the Council's Green Belt Review and the supporting text in Chapter 5 of the emerging TBP, it is understood that the Green Belt in the Borough including around the village of Shurdington was first designated in 1968.

2.2 The Borough Local Plan to 2011 did include the release of land from the Green Belt at Shurdington in respect of three sites, a nursery allocated for residential development, and two areas of land that had already been developed. A Playing Field elsewhere in Shurdington was also added to the Green Belt through this adopted Plan.

2.3 In terms of the Joint Core Strategy, the preparation of this was informed by a Green Belt Review in 2011. This included an assessment of land around Shurdington although this was at a strategic level that considered large parcels of land rather than a more detailed review at a smaller scale. When assessed on that scale it is not surprising that it was concluded that these parcels make a significant contribution to Green Belt purposes, but that fails to differentiate between different areas of each parcel, where it is arguable parts will contribute more strongly than others. Therefore whilst other modifications to the Green Belt were made across the three authority areas, the JCS did not propose to make any changes to Green Belt boundaries around Shurdington.

2.4 The only changes to the Green Belt boundary at Shurdington since its designation in the 1960s have therefore been minor changes through the adopted Borough Local Plan to 2011, thereby emphasising the need to review the Green Belt as part of this emerging Plan.

3. Exceptional Circumstances for Allocations and Extending the Boundary at Shurdington (Q3.11)

3.1 As set out in response to Q3.10 above, the Green Belt boundary around Shurdington has remained largely unchanged since it was first designated in the 1960s. The implications of this for Shurdington has been the inability to deliver housing to support the village in recent years. Paragraph 5.4 of the emerging TBP confirms that only 7 dwellings have been committed since the start of the plan period, despite the Council considering that



Shurdington represents one of the Borough's largest and most sustainable service villages.

3.2 The status of Shurdington was also confirmed through the JCS, which established the importance of the village in Policy SP2c: Settlement Hierarchy as one of 12 Service Villages situated within the three authority areas, whilst Policy SP2 set out the housing requirement for service villages cumulatively to deliver in the order of 880 homes over the plan period to 2031. Whilst the JCS did not specifically break down this requirement and apportion it to each of the settlements, given the recognition of Shurdington as one of the service villages it is reasonable to envisage that some of the requirement will be delivered at this settlement. However, given the constraints posed by the Green Belt surrounding the built up area, in order to facilitate growth at the village the release of land from the Green Belt through this Plan has been critical. Whilst the Council could have sought to accommodate the growth at other settlements not constrained by the Green Belt, this would have not provided the opportunity for growth at Shurdington, despite its credentials as a sustainable settlement suitable for further housing development.

3.3 It is therefore apparent that through the JCS the rationale for development at Shurdington has been established whilst the emerging TBP seeks to deliver this through releasing land from the Green Belt in order to accommodate housing at the village, with accompanying justification to amend the Green Belt extent.

4. Additional Housing Development at Shurdington (Q3.12)

4.1 The context to the emerging TBP is one of a shortfall in terms of housing supply, which has been the case since the adoption of the JCS. The Council has sought to remedy this shortfall to some extent through the emerging TBP, however the Housing Background Paper demonstrates that despite the proposed allocations through the TBP, there will still be a shortfall of over 1,600 homes to be addressed through the JCS review. This demonstrates the importance of securing allocations to deliver housing through the TBP, as failing to do so will mean that the Council is unable to defend against speculative applications on less sustainable sites because of a housing supply shortfall.

4.2 In relation to Shurdington specifically, the Council in its December 2020 Housing Land Supply Position Statement, seeks to apportion the housing requirement for Service Villages from the JCS between those in the Borough, identifying an indicative requirement for Shurdington of 125 dwellings. This figure represents the relative sustainability of Shurdington when compared to other settlements in the same category, and therefore the suitability of the village to accommodate growth. The HLS Position Statement however identifies the allocation of just 85 dwellings through the emerging TBP, representing just 68% of the apportioned requirement set out for Shurdington.

4.3 Whilst arguably there are other alternatives that could have been utilised, including not allocating as much land for housing through this Plan overall, or focusing allocations on less sustainable settlements that are not constrained by the Green Belt, the Council has recognised the need to facilitate some growth at Shurdington. This is necessary to rationalise the position of this settlement and the vitality of the community is maintained and enhanced. Given the constraints posed by the Green Belt, it is likely that any opportunities to deliver housing through infill sites will already have been explored, as this



has been the only way to accommodate any further housing since the adoption of the Borough Local Plan to 2011 in 2006. Therefore, it is not likely that further growth will be delivered at the village except on the proposed allocated sites, unless developments come forward that would satisfy one of the exceptions to inappropriate development in the Green Belt as set out in national policy, or otherwise very special circumstances are demonstrated to justify a specific development.

- 4.4 Given these constraints, it is considered that the Council has failed to allocate sufficient growth at Shurdington, particularly when taking into consideration the suitability of the settlement to accommodate growth as acknowledged by the Council. Furthermore, the Council should recognise the Framework's provisions relating to the review of the Green Belt, with the expectation that any changes to the boundary will endure not just for the plan period, but beyond this. In order to accommodate any further growth at Shurdington in the future this would require further changes to the Green Belt, which it is argued should be allocated through this Plan in order to address chronic issues relating to housing supply in the Borough as well as the need to support growth at Shurdington in order to maintain its position and support the village's services and facilities.
- 4.5 As such, it is considered that there should be an additional site allocated on land promoted by EPV through the Local Plan preparation process, namely land at Badgeworth Lane. This site represents a location that is suitable, available and achievable for residential development and relates well to the existing settlement. The tangible prospect of the site to deliver 120 dwellings should be realised through the TBP, with preferred route being via Housing Allocation; but also that safeguarding this land to the southwest of the settlement could remove it from the Green Belt for delivery of housing on the occasion that housing delivery falls below the required levels. Such an safeguarded area would have the potential to provide approximately 200 dwellings.

5. Shurdington's Settlement Boundary (Q3.13)

- 5.1 EPV considers that generally the Council has taken a robust approach to settlement boundaries, including at Shurdington. The modifications sought in this Plan in terms of the release of land from the Green Belt is generally restricted to a small number of locations around the village that have been determined to represent the most appropriate sites for housing. The resulting boundaries appear to be justified and effective, according with the Framework's requirements to use physical features that are readily recognisable and likely to be permanent.
- 5.2 However, as established through this Statement and others submitted to the Examination, EPV is concerned that the Council has not gone far enough in allocating sites for housing. In particular at Shurdington, due to the constraint posed by the Green Belt, the village has been unable to grow for a lengthy period of time and as a result through the emerging TBP the Council should be seeking to allocate more sites at Shurdington to allow the village to expand and ensure that it continues to represent a sustainable community. The Council has recognised in the December 2020 HLS Position Statement that the village is appropriate to deliver a significant proportion of the growth anticipated at Service Villages, however through this emerging TBP has not sought to deliver this number of dwellings in full. Given the lack of other opportunities for growth to be delivered at Shurdington, this is



considered to represent a short-sighted approach that does not accord with the Framework's requirements for authorities to significantly boost housing and be positively prepared in respect of meeting the area's housing needs as a minimum.

- 5.3 Therefore, it is proposed that the settlement boundary around the west of the village should be modified further in order to include EPV's land at Badgeworth Lane as a further housing allocation. This site represents a sustainable location for further growth at Shurdington, as it is well-located in regard to the existing services and facilities as well as situated away from the eastern part of the village that is constrained by the setting of the Cotswolds AONB. The boundary to the west of the village should therefore be modified further to exclude the land promoted by EPV in order to accommodate further growth and ensure that there is requirement to modify this boundary again in the short-term.

6. Effect on the Green Belt (Q3.14)

- 6.1 The proposed modifications to the settlement boundary at Shurdington and the associated release of land from the Green Belt, will impact on the openness of the land however is not considered to significantly affect the purposes of the Green Belt.

- 6.2 It is considered that several purposes are not relevant to proposals at Shurdington, as it is not a historic settlement, and there are no opportunities for urban regeneration within the village. Furthermore, the limited extent of proposed Green Belt release will not lead to unrestricted sprawl or coalescence between the village and other settlements and will continue to safeguard the countryside. It is maintained that due to the extent of Green Belt designation in the locality, Green Belt releases would not harm its function or purpose; including the proposed allocation of EPV's land at Badgeworth Lane.

- 6.3 In respect of openness, it is accepted that this would be affected by the release of land from the Green Belt with subsequent development, although the impact would be limited and only appreciated in the context of the site's themselves and the immediate surroundings. Overall, the openness experienced between Shurdington and other settlements would be maintained through the large tracts of countryside that would remain designated as Green Belt. The Council has clearly demonstrated through the emerging TBP the exceptional circumstances to justify the release of land from the Green Belt at Shurdington, recognising the genuine need to accommodate housing growth to support the village as well as help to meet the housing needs for the Borough in the most sustainable locations.

7. Shurdington Housing Allocations (Q3.15)

- 7.1 The emerging TBP includes three allocations for housing at Shurdington. These sites are all considered to represent appropriate and sustainable locations for development, and it is considered that the appropriate tests have been met to justify their release from the Green Belt. However, as set out above, it is considered that additionally the TBP should seek to allocate the site promoted by EPV at Badgeworth Lane as this equally represents an appropriate and sustainable location for development, that could accommodate the additional growth at Shurdington that has been identified through the JCS and subsequent



work by the Council to apportion the growth for Service Villages at the settlements within the Borough.

- 7.2 The site promoted by EPV is currently land to pasture as an arable field, and extends to approximately 6ha located adjacent to the western boundary of the built up area of the village. The site is enclosed on two sides by existing development, bound by curtilages of residential dwellings which front Lambert Avenue and Badgeworth Lane. The site would form a coherent extension to the village, reflecting existing development patterns. There is no relevant planning history in respect of this site, although has been promoted to the Council through the local plan examination process. Furthermore, it is not subject to any statutory constraints in terms of landscape, ecological or heritage-related, aside from the designation as Green Belt, whilst it is fully situated within Flood Zone 1 and not subject to surface water flood risk.
- 7.3 The EPV owned site could accommodate 120 dwellings over the 6 hectares identified. This would be increased further if the EPV site were to be identified alongside adjacent lands that have been identified as suitable for consideration, with the potential to provide circa 200 dwellings that should be considered to be a substantial contribution to boosting housing supply.

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