

**TEWKESBURY BOROUGH PLAN 2011-2031 – EXAMINATION IN PUBLIC
STATEMENT ON BEHALF OF L&Q ESTATES LIMITED – REFERENCE ID 381
LAND AT HARVEY’S LANE, WINCHCOMBE**

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

This Matter Statement has been prepared on behalf of our client, L&Q Estates Limited, in response to the Inspector’s List of Matters, Issues and Questions (MIQs) as part of the Tewkesbury Borough Plan Examination in Public.

L&Q Estates Ltd control land located to the north and south of Harvey’s Lane, which directly adjoins the settlement boundary of Winchcombe (the ‘Site’). The Site has capacity to deliver up to 130 dwellings with associated open space and landscape infrastructure – split between 50 dwellings to the south of Harvey’s Lane and 80 dwellings to the north.

The Site was partially allocated within the Preferred Options version of the Tewkesbury Borough Plan (TBP) as a suitable and sustainable location to deliver approximately 45 dwellings. However, following the Preferred Options consultation, the allocation was deleted from the emerging TBP.

This Matter Statement should therefore be read in conjunction with our representations to the Pre-Submission consultation which demonstrates that the emerging TBP is unsound as currently drafted.

In accordance with the Inspector’s MIQs, this Matter Statement relates to Matter 3C: Overall housing provision in the TBP.

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?

1. The emerging TBP proposes to allocate two Green Belt sites in the service village of Shurdington for residential development – totalling up to 70 dwellings. However, the NPPF (February 2019) is clear at Paragraph 137 that:

“Before concluding that exceptional exist to justify changes to the Green Belt, the strategic policy-making authority should be able to demonstrate that is has examined fully all reasonable options to meetings its identified need for development”.

2. With this in mind, we consider there to be no robust evidence provided to demonstrate that ‘all other reasonable options’ have been considered before allocating land for release

from the Green Belt. Without robust evidence to demonstrate that no other suitable development options exist outside of the Green Belt, it is considered that proposed allocations in the Green Belt, including those at Shurdington, should be deleted in favour of non-Green Belt sites.

3. Our Client's Site is located outside of the Green Belt and is a sustainable and suitable location to deliver up to 130 dwellings. The Site is positioned on the edge of a Rural Service Centre, defined as a higher order settlement to Shurdington. It is therefore in a sustainable location with close access to pedestrian routes, public transport, services and facilities. Accordingly, the Site should be considered for residential development before any Green Belt site is released. Until TBC can demonstrate that all other reasonable options have been examined in line with Paragraph 137 of the NPPF, the draft Plan cannot be found sound.
4. In addition, Draft Allocation SHU2 scored worse than the Site in respect of its Landscape and Visual Impact within the Housing Background Paper (HBP) (October 2019) (Ref: EB013). Draft Allocation SHU1 was not even assessed as part of Appendix E or the Additional Site Assessments contained at Appendix G of the HBP (October 2019). It is therefore unclear as to what evidence the Council has considered draft allocation SHU1 against to be considered a sustainable location for development.
5. In light of the above, it is considered that the Site represents a more suitable and sustainable location for development than draft allocations SHU1 and SHU2. We do not raise an objection to either of these allocations specifically however, by not allocating the Site, it is considered that the Council has failed to assess all other reasonable options before releasing land from the Green Belt. On that basis alone it is considered that the emerging TBP cannot be found sound.