

Meeting:	Planning Policy Sub-Committee	Date:	26 March 2015
Subject:	Tewkesbury Borough Plan 2011 – 2031 Draft Policies and Site Options - Public Consultation		
Report Of:	Cabinet Member for Regeneration and Culture		
Wards Affected:	No		
Key Decision:	No	Budget/Policy Framework:	No
Contact Officer:	Anthony Wilson, Head of Planning Louise Follett, Senior Planning Officer Adam Gooch, Senior Planning Officer		
Appendices:	1 – Letter of Representation to Tewkesbury B. C.		

1.0 Purpose of Report

- 1.1 To provide an overview of the key issues officers have identified in relation to the Tewkesbury Borough Plan 2011 – 2031 Draft policies and site options public consultation (Feb 2015) and endorsement of Appendix 1 as the Council's formal response to this consultation.

2.0 Recommendations

- 2.1 Planning Policy Sub-Committee is asked to **RECOMMEND** that it endorses Appendix 1 as the Council's response to the Draft Tewkesbury Borough Plan Draft policies and site options public consultation (Feb 2015).

3.0 Background and Key Issues

- 3.1 In October and November 2013, Tewkesbury Borough undertook a scoping consultation on their Local Plan to ascertain and identify key issues for residents and business in the Borough. Following on from this, and the submission of the Joint Core Strategy (JCS) to the Planning Inspectorate in November 2014, the council have published a draft policies and site options document (February 2015) for a six week period of public consultation.
- 3.2 Once adopted the Tewkesbury Borough Plan and JCS, taken together, will comprise the statutory development plan for Tewkesbury Borough. Over the next 16 years Tewkesbury borough will experience significant growth; it will accommodate large strategic allocations identified through the JCS, as well as smaller scale growth to be identified in the rural areas through the Tewkesbury Borough Plan.

- 3.3 It is the role of the Tewkesbury Borough Plan to identify sites for development in the rural areas as well as provide non strategic planning policy for the delivery of all development in the borough.
- 3.4 The JCS identifies the quantum of development to be delivered across the rural areas in Rural Service Centres (Bishops Cleeve and Winchcombe) and Service Villages. The JCS lists those settlements identified as Service Villages.
- 3.5 The response to Tewkesbury Borough, attached at Appendix 1, has been prepared in the spirit of co-operation with comments offered in order to help Tewkesbury achieve a 'sound' plan that meets legal compliance regulations.

4.0 Draft Response

- 4.1 Officers have reviewed the content of the Draft policies and site options public consultation and are broadly content that it offers a good starting point for plan preparation for the period 2015 – 2031.
- 4.2 However, there are a range of concerns and comments to be made on its contents and these are briefly summarised below;
- While Tewkesbury Borough have relied on evidence prepared for the JCS they have not undertaken any additional evidence base work to support the draft policies and site options document other than Strategic Environmental Assessment and Habitats Regulation Assessment. Further work will be required on evidence base relating to Transport; Heritage; Townscape; Biodiversity & Infrastructure and Viability for the plan to be found sound in accordance with current guidance contained in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).
 - The timetable for plan preparation on page 7 of the document is very ambitious and will not allow for the highway implications of the rural sites to be tested on the updated 2013 Saturn model before preparation of the pre-submission version of the plan.
 - The timetable of plan preparation also allows little time for consideration of any implications of a JCS Inspector's report and the impact that may have for the spatial strategy for the JCS and therefore on the Draft Tewkesbury Borough Plan.
 - Concern is expressed over the very prescriptive quantum for development identified in the rural areas when these have not yet been set by an adopted JCS, especially as the NPPF requires planning authorities to plan for 'significant growth'.
 - Concern is expressed over consulting on potential site allocations that do not have express developer interest through the SALA as these may not be deliverable.
 - It is recommended that all rural settlement boundaries, where they exist, be extended to include recent appeal decisions, as these areas have been found suitable for development by a Planning Inspector.
 - Clarification is sought and recommendations made with regard to matters relating to provision for Gypsies, Travellers and Travelling Showpeople.
 - Attention is drawn to the need to raise the profile of the public health benefits of active travel and the need to promote sustainable transport interchanges through policy throughout the Borough.

- Air quality is highlighted as a key sustainability issue in Tewkesbury town in the Sustainability Appraisal and yet there seems to be no specific local planning policy to address this matter. It is suggested that this matter be addressed.
- There seems to be little evidence base to support the economy section of the plan, the quantum of development proposed or the proposed allocations, clarification is also suggested with regard to issues relating to the policy for new retail uses.
- With regard to the flooding policy it is suggested that the term, 'cumulative impact' should be replaced with a policy commitment to ensure betterment downstream for all sites, especially those that impact on the City and the run off rates of the Wotton and Horsbere Brooks. It is suggested that a 30% reduction over green field run off rates is supported as an alternative – this is the policy supported within the City.
- Concern is expressed over the fact that the more detailed work undertaken for the JCS on Green Infrastructure (GI) has not been incorporated into a policy stance in the draft plan. The possibility of further GI connections to the River Severn and its wash lands and the Cotswold's AONB should also be made clear.

5.0 Reasons for Recommendations

- 5.1 Officers have undertaken a review of the Draft Policies and site options consultation for the Tewkesbury Borough Local Plan and consider that Appendix 1 represents the most appropriate constructive consultation response offered in order that the iterative Tewkesbury borough development plan process might be found sound on examination.

6.0 Future Work and Conclusions

- 6.1 After consideration of consultation comments Tewkesbury Borough will proceed to the preparation of and consultation on a Pre-Submission plan in Winter 2015 with submission to Secretary of State in Spring 2016, examination in Spring/Summer 2016 and adoption late 2016.
- 6.2 There will be opportunity for members to make further comments on soundness and legal compliance the Tewkesbury Borough Local Plan (TBLP) at the pre-submission stage should they choose to do so.

7.0 Financial Implications

- 7.1 None

8.0 Legal Implications

- 8.1 The development quantum contained within the TBLP need to comply with the requirements of the JCS, this strategic plan has yet to be adopted, the preparation of the TBLP should not precede the adoption of the JCS.

9.0 Risk & Opportunity Management Implications

9.1 No negative impacts identified.

10.0 People Impact Assessment (PIA):

10.1 No negative impacted identified.

11.0 Other Corporate Implications

Community Safety

11.1 N/A

Sustainability

11.2 As a development plan the TBLP has a legal responsibility to promote and allocate sites in order to deliver sustainable development in Tewkesbury Borough for the period up to 2031.

Staffing & Trade Union

11.3 .N/A

Background Documents:

Tewkesbury Borough Plan 2011-2031 - Draft policies and site options public consultation (Feb 2015)

<http://tewkesbury.gov.uk/index.aspx?articleid=2321>

Submission Gloucester Cheltenham and Tewkesbury Joint Core Strategy (Nov 2014)

<http://www.gct-jcs.org/Documents/Publications/Submission/JCS-Submission-Version-November-2014a-corrected.pdf>