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Dear Holly,

**DRAFT POLICIES AND SITE OPTIONS: PUBLIC CONSULTATION**

Thank you for consulting Gloucester City Council on the above public consultation. The response below was agreed by Planning Policy Sub-Committee on 27<sup>th</sup> March 2015.

These comments are offered in the spirit of strategic partner joint working in order to ensure that Tewkesbury Borough progress towards the preparation of a sound local development plan document.

**General comments**

- While it is understood that the Draft Tewkesbury Borough Local Plan (TBLP) has utilised the evidence prepared for the Submission Joint Core Strategy (JCS) (Nov 2014) there seems to be little new evidence base (other than the Integrated Sustainability Appraisal and Habitat Regulations Assessment) made available for public consultation accompanying the draft plan consultation. The NPPF requires a Local Plan to be based on evidence based assessment including heritage and townscape character analysis; transport – including traffic impact; strategic flood risk; biodiversity; infrastructure and viability. None of this work has been published for consultation alongside the draft plan to allow reasonable consideration of the rural site allocations proposed, neither is the evidence available to allow other possible brown field sites at Tewkesbury Town to be taken into consideration for redevelopment purposes. The soundness of a draft plan without this evidence has to be questioned.
- Timetable – the timetable for plan preparation at page 7 allows little time for the Transport Modelling of preferred rural sites using the updated 2013 Gloucestershire Highways Saturn Model which should be available to JCS districts for local plan modelling purposes in the autumn of 2015. This evidence is crucial in order to be able to test the local highway and strategic road network mitigation required from proposed site allocations and therefore the viability of the proposed TBLP.
- The timetable also offers little time for consideration of alternative spatial strategies should this be required as an outcome of the JCS EiP. Moreover it would be wise for Tewkesbury Borough to take it's local plan to enquiry only when the quantum of development for the Borough proposed by the JCS has been formally agreed by an Inspector and the JCS formally plan adopted.

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## Comments on Draft Policies

### **Policy HOU1 – Housing Site Allocations**

- This policy is currently very prescriptive with regard to precise numbers to be delivered at the Rural Service Centres and Service Villages – a more loosely worded policy is suggested to allow for flexibility should housing numbers be amended through consideration of the JCS – or should existing extant consents expire before implementation.
- Moreover – NPPF compliance would require the plan to ‘significantly boost’ housing supply rather than constrain it – so a suggestion may be to allude to minimum quantum’s of development not maximum’s.
- It is noted that housing allocations from the TBLP 2011 have been carried forward - is their evidence to demonstrate that these sites are currently being actively pursued through the planning process? If they are not it may be prudent to consider alternative allocations to be able to adequately demonstrate a 5 yr supply of deliverable sites in accordance with para 47 of NPPF.
- With regard to the rural sites identified caution is expressed in the consideration of those sites not being actively pursued through the SALA process by a developer for the reason described above. In order to be able to demonstrate deliverability there should be evidence of landowner, developer or house builder engagement with the LPA with clear intent to bring the site forward within five years. It is noted that many of the sites do not have developer proposals therefore concern is raised over the deliverability these sites.

### **Policy HOU2 – Settlement Boundaries**

- It would seem reasonable for all the proposed service villages to have a settlement boundary in order to provide certainty for the bringing forward of development at this size of settlement?
- Bishops Cleeve settlement boundary should be extended to include the boundary of the Homelands/Cleveland’s development to the north of the village.
- Alderton settlement boundary should be extended to include any new appeal decisions
- Highnam – proposed sites should make use of existing distributor road around the village rather than locate development away from existing centre. A focus on the existing estate would allow occupiers to use sustainable modes of transport for local journeys such as the school run and trips to the local shop and doctors surgery.

### **Policy GTTS1 – Gypsy, Traveller and Travelling Showpeople sites**

### **Policy GTTS2 – Provision for Gypsies, Travellers and Travelling Showpeople**

- Policy SD14 of the JCS sets out a criteria based policy for the assessment of planning applications relating to gypsies, travellers and travelling showpeople.
- With regard to the final point of Policy GTTS1, it is assumed that commercial uses will not be permitted on gypsy and traveller sites but will be permitted on travelling showpeople sites? It is expected this would be the case given the general characteristics of a travelling showpeople site, which incorporate residential, storage and workshop uses. The policy / supporting text would benefit from clarification around this point.
- Through the policies there is varying use of ‘gypsies and travellers’ and ‘gypsies, travellers and travelling showpeople’ (for example in the reasoned justification). It is assumed that all elements of the policy relate to all of these communities. It is therefore suggested this be reviewed and amended accordingly.
- As has been the case for other quantum-based policies, suggest the gypsy, traveller and travelling showpeople requirement from the GTTSAA is included in this policy to provide clarity on the level of need.

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## Section E – Transport and Accessibility

- There needs to be mention of the public health benefits of walking and cycling in reasoned justifications to policies relating to these matters. The use of public transport also has public health benefits in that it encourages en route active travel, normally walking, to and from bus stops or train stations.
- There is also no mention in this section of integrated transport stations with facilities for changing modes of sustainable transport eg: enhanced cycle storage facilities at key public transport nodes to encourage increased patronage of bus and rail services to the main employment centres of Gloucester, Cheltenham and Tewkesbury.
- Also no mention of policy to help improve air quality in and around Tewkesbury Town Centre – this matter is highlighted as a key sustainability issue by the SA.

## Section G – Economy and Tourism

- Where is the evidence base to demonstrate the amount of employment land required by Tewkesbury Borough going forward?
- The JCS employment allocations take account of the amount of employment land required across the whole JCS area, however there seems to be no evidence published for consideration alongside the draft TBLP to support the amount of employment land being carried forward in the TBLP from the 2011 TBLP. Where is the evidence base for this matter?
- There seems to be no policy seeking to ensure implementation of high speed broad band networks throughout within the Borough or any other policy supporting telecommunication development in the Borough.. While there is no need to repeat national planning policy guidance given the rural nature of the Borough and the desire to improve home working and reduce travel this would seem to be a locally specific matter to address through the local plan.

### Policy RET1 – Protecting existing retail uses

- Typo – ‘Joint Core Strategies retail hierarchy’ should be ‘Joint Core Strategy’s’.
- Policy needs to define the local hierarchy of centres to sit under those identified in the JCS.

### Policy RET2 – New retail uses

- The policy does not set out sites or options for how the retail need of Tewkesbury and other centres as identified in the JCS Retail Study (Phase 1 Update, 2014). It is important that specific site allocations are made for main town centre uses, including retail, to provide for the full assessed need.
- Criterion 1 – This should be expanded to ensure that applications for retail development in designated retail areas will be considered favourably where the proposal is commensurate with the identified role and function of that retail area in the defined hierarchy of centres.
- Criterion 4 – the impact assessment for main town centre uses is required by the NPPF which is policy, not guidance.
- It is not clear whether or not consideration has been given to the setting of a local threshold for applicants to undertake an impact assessment for edge/out-of-centre proposals for main town centre uses including retail, or whether the authority is content with the default threshold of 2,500 sq m in accordance with the NPPF. Given the scale and characteristics of some of the smaller centres in Tewkesbury Borough and the potential impact competitor proposals could have, it is suggested that a lower impact threshold is considered.

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## Section J – Flooding and Drainage

- Some brooks such as Horsebere and Wotton rise in Tewkesbury Borough and then flow through Gloucester. Development upstream can therefore have an impact on flood risk in Gloucester. While welcoming the section on Flooding we would suggest that the cumulative impact is replaced with a commitment to betterment on certain reaches that are at or over capacity further downstream.
- All development should deal with its own water so cumulative impact should not be the issue. However, the development process provides one of the few opportunities reduce flood risk in these small catchments as such a 30% reduction over Greenfield run off rates is supported as an alternative.

## Section D – Infrastructure Requirements and Community Facilities

- Support reference to Green Infrastructure and the Joint Core strategy in section D and K. However disappointed that the more detailed work done as part of JCS has not made it into a detailed policy stance. GI strategy for JCS and Gloucester builds on the rivers and brooks that flow through the settlements connecting urban areas with the more rural hinterland. If this is to work, large scale developments on the fringes of Gloucester (and indeed Cheltenham) need to be permeable to people and wildlife and connect to GI within the urban areas. The notion of further connections to the strategic green infrastructure of the River Severn and its wash lands and the Cotswold's AONB should also be made clear.

A dedicated policy stance in Section D or K would therefore be supported.

## Chapter 4 – Monitoring and Review

- As far as is possible TBLP monitoring indicators should be harmonised with JCS indicators and/or data sets already collected annually by other departments within the Council or by other stakeholders in order to make best use of resources and ensure that monitoring tasks are not duplicated.

I trust these comments are useful and will be taken into account in preparing the next stage of the plan.

Yours sincerely,

**Anthony Wilson**  
**Head of Planning**