

22 July 2019

Committee	Council
Date	Tuesday, 30 July 2019
Time of Meeting	6:00 pm
Venue	Tewkesbury Borough Council Offices, Severn Room

ALL MEMBERS OF THE COUNCIL ARE REQUESTED TO ATTEND

Agenda

- 1. APOLOGIES FOR ABSENCE**
- 2. DECLARATIONS OF INTEREST**

Pursuant to the adoption by the Council on 26 June 2012 of the Tewkesbury Borough Council Code of Conduct, effective from 1 July 2012, as set out in Minute No. CL.34, Members are invited to declare any interest they may have in the business set out on the Agenda to which the approved Code applies.

- 3. MINUTES**

1 - 17

To approve the Minutes of the meetings held on 21 and 28 May 2019.



4. ANNOUNCEMENTS

1. When the continuous alarm sounds you must evacuate the building by the nearest available fire exit. Members and visitors should proceed to the visitors' car park at the front of the building and await further instructions (during office hours staff should proceed to their usual assembly point; outside of office hours proceed to the visitors' car park). Please do not re-enter the building unless instructed to do so.

In the event of a fire any person with a disability should be assisted in leaving the building.

2. To receive any announcements from the Chair of the Meeting and/or the Chief Executive.

5. ITEMS FROM MEMBERS OF THE PUBLIC

- a) To receive any questions, deputations or petitions submitted under Council Rule of Procedure.12.

(The deadline for public participation submissions for this meeting is 24 July 2019).

- b) To receive any petitions submitted under the Council's Petitions Scheme.

6. MEMBER QUESTIONS PROPERLY SUBMITTED IN ACCORDANCE WITH COUNCIL PROCEDURE RULES

To receive any questions submitted under Rule of Procedure 13. Any items received will be circulated on 30 July 2019.

(Any questions must be submitted in writing to Democratic Services by, not later than, 10.00am on the working day immediately preceding the date of the meeting).

7. PRE-SUBMISSION TEWKESBURY BOROUGH PLAN

18 - 256

To approve the Pre-Submission version of the Tewkesbury Borough Plan under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 as the version to be submitted, following consultation, to the Secretary of State for independent examination.

8. AUDIT AND GOVERNANCE COMMITTEE ANNUAL REPORT 2018/19

257 - 271

At its meeting on 24 July 2019 the Audit and Governance Committee considered its annual report for 2018/19. An update on the outcome of that meeting will be provided at the Council meeting.

9. HONORARY ALDERMAN

The Council is asked whether it wishes to recommend the award of the distinction of Honorary Alderman to appropriate immediate past Members of the Council.

10. NOTICE OF MOTION - DECLARING A CLIMATE CHANGE EMERGENCY

Councillor Cody will propose and Councillor Softley will second:

Humans have already caused devastating climate change, the impacts of which are being felt around the world. Global temperatures have already increased by 1 degree Celsius from pre-industrial levels. Atmospheric CO₂ levels are above 400 parts per million (ppm). This far exceeds the 350ppm deemed to be a safe level for humanity;

In order to reduce the chance of runaway Global Warming and limit the effects of Climate Breakdown, it is imperative that we as species reduce our CO₂eq (carbon equivalent) emissions from their current 6.5 tonnes per year to less than 2 tonnes as soon as possible;

Individuals cannot be expected to make this reduction on their own. Society needs to change its laws, taxation, infrastructure, etc., to make low carbon living easier and the new norm;

Carbon emissions result from both production and consumption;

Tewkesbury Borough Council has already addressed the problem of single use plastics and has shown a strong commitment to recycling and sustainable transport but more needs to be done.

In Gloucestershire the consequences of no action include:

- Increased risk of flash flooding and the resulting damage to buildings, crops, farmland and infrastructure as a result of more extreme rainfall events.
- Health problems due to increased heat stress particularly for vulnerable adults and children.
- Increased costs associated with changes to crops and biodiversity.
- Higher energy costs.
- Crop failures associated with extreme heat, such as was experienced in 2018.

The County Council has already recognised more needs to be done and has created an additional cabinet role with responsibility for overseeing the authority's approach to prevention of, mitigation of, and adaptation of climate change.

The government believes that a shift to a very low carbon energy future represents the best course for the country's economic development while lowering the risk of fuel poverty and reducing air pollution.

In view of the above the Council is asked to:

- declare a “Climate Emergency”.
- commit to doing all in its power to make Tewkesbury Borough Council carbon neutral by 2030, taking into account both production and consumption emissions.
- set up a Working Group consisting of seven Members of the Council (to be nominated at this evening’s meeting) to prepare a long-term plan to achieve this, together with any initial budgetary requirements, to be reported back to the Executive Committee in October.
- call upon central government to provide additional powers and resources to support local and national action towards the 2030 target.
- commit to working with partners in Gloucestershire to achieve Countywide carbon neutrality aims.

11. SEPARATE BUSINESS

The Chairman will move the adoption of the following resolution:

That under Section 100(A)(4) Local Government Act 1972, the public be excluded for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part 1 of Schedule 12A of the Act.

12. SEPARATE RECOMMENDATIONS FROM EXECUTIVE COMMITTEE

The Council is asked to consider and determine separate recommendations of a policy nature arising from the Executive Committee as follows:-

(a) Spring Gardens/Oldbury Road Regeneration

272 - 339

To consider the formal report from MACE Group Ltd and agree the options to move forward for due diligence within the next phase of the scheme.

Recording of Meetings

In accordance with the Openness of Local Government Bodies Regulations 2014, please be aware that the proceedings of this meeting may be recorded and this may include recording of persons seated in the public gallery or speaking at the meeting. Please notify the Democratic Services Officer if you have any objections to this practice and the Mayor will take reasonable steps to ensure that any request not to be recorded is complied with.

Any recording must take place in such a way as to ensure that the view of Councillors, Officers, the public and press is not obstructed. The use of flash photography and/or additional lighting will not be allowed unless this has been discussed and agreed in advance of the meeting.

**Head of Democratic Services for
Borough Solicitor**

TEWKESBURY BOROUGH COUNCIL

**Minutes of a Meeting of the Council held at Tewkesbury Abbey on
Tuesday, 21 May 2019 commencing at 7:30 pm and re-convened at the Council
Offices, Gloucester Road, Tewkesbury on Tuesday, 28 May 2019 commencing at
6:00pm**

Present:

The Worshipful the Mayor
Deputy Mayor

R H Hatton
Councillor G F Blackwell

and Councillors:

R A Bird, G J Bocking, C L J Carter, C M Cody, K J Cromwell, M Dean, R D East, J H Evetts,
L A Gerrard, P A Godwin, M A Gore, D W Gray, D J Harwood, E J MacTiernan, J R Mason,
H C McLain, P D McLain, H S Munro, J W Murphy, P W Ockelton, A S Reece, J K Smith,
P E Smith, V D Smith, R J Stanley, S A T Stevens, P D Surman, S Thomson, R J E Vines,
M J Williams and P N Workman

CL.1 APOLOGIES FOR ABSENCE

- 1.1 Apologies for absence were received from Councillors A Hollaway, M L Jordan, C Reid, R J G Smith, C Softley and M G Sztymiak.

CL.2 ELECTION OF MAYOR

- 2.1 With the retiring Mayor, Ruth Hatton, in the chair, it was proposed by Councillor Elaine MacTiernan, and seconded by Councillor Mike Dean, that Councillor Gill Blackwell be, and is hereby elected, Mayor of the Borough of Tewkesbury for the ensuing Municipal Year.
- 2.2 On the Motion being put to the meeting it was declared to be carried, whereupon the Mayor took the chair, signed the Declaration of Acceptance of Office and took the Oath of Allegiance to Her Majesty the Queen.
- 2.3 In thanking Members for the honour and pleasure of being elected Mayor of the Borough of Tewkesbury, and those present for attending the ceremony, Councillor Blackwell indicated that Tewkesbury Borough was working hard with all of its communities to raise the profile of the Borough, whether it be employment or leisure interests. Officers at the refurbished Borough Council offices worked hard to help all members of the community with the Public Services Centre not only accommodating office staff but also the Police, the Department for Work and Pensions, the Citizens' Advice Bureau and officers from Gloucestershire County Council's Social Services, among others. The Council was also the first local authority in the country to have a Growth Hub within its building which helped businesses with information and provided a place to get assistance with all aspects of growing a new business. As Mayor for the coming year, she hoped to be able to promote the Borough in the best possible way and to ensure that the 'open to everyone' message was carried across the whole Borough, especially to those in the communities that may need extra assistance.

- 2.4 The Mayor advised that her Consort for the year would be her husband, Mike Blackwell, and she hoped that together they would be able to represent the Borough at as many events as possible. Her Chaplain for the year would be Reverend Wendy Ruffle and she offered her thanks to Wendy for her continued support. The Mayor also announced the organisations that she would be supporting during her Mayoral Year which were the Butterfly Garden at Bamfurlong Lane and the Maritime Volunteer Service – Severn Unit. The Butterfly Garden offered people of all ages who were dealing with disablement of any kind the chance to feel that they had an opportunity to do something purposeful through its offer of education, recreation and therapy. The Maritime Volunteer Service aimed to keep the UK's maritime tradition alive by training and delivering skills to nationally recognised standards; its members were volunteers and helped out in times of need and emergency for local communities which the Mayor considered to be of great value to Tewkesbury as the confluence of the Rivers Severn and Avon.
- 2.5 In concluding her speech, the Mayor thanked everyone for attending and hoped they would have an enjoyable evening. She also thanked the organist and each of the students, whose contributions to the ceremony had made it such an enjoyable event, as well as Reverend Wendy Ruffle and the Head of Music at Tewkesbury School for their help in organising the performances for the evening.

CL.3 RETIRING MAYOR - R M HATTON

- 3.1 Councillor Jim Mason expressed the Council's thanks to Ruth Hatton for the way that she had represented the Borough throughout her year in Office. Councillor Mason indicated that, 12 months ago, he had had the great privilege to propose Ruth for the position of Mayor as he knew she would be excellent in the role. He felt she had been a fantastic ambassador for the Borough and, together with her Consort, had attended well over 100 functions and events. There were too many engagements to mention them all but there were a few he felt demonstrated how wholeheartedly Ruth and Harry had embraced Ruth's Mayoral year; they had joined the Gloucestershire Fire and Rescue Service on their 'bed push' challenge which had raised over £15,000 for the Gloucestershire Oncology Centre; attended the German Bivouac at the ARRC where Ruth had made a speech in German having never spoken the language before; crowned the May Queen and King at the Woodmancote fete; and Ruth had read a poem when attending the Women in Aviation exhibition at the Jet Age Museum. Councillor Mason felt it was those little extra personal touches that had made the year such a success; Ruth had also attended a number of events involving young people including Alderman Knight's Got Talent Show, Angels and Superheroes and a Scratch Nativity play at Queen Margaret's Primary School where Harry had dressed up as an elf. Ruth had been a great supporter of the youth of the Borough raising funds for her charitable organisations; the Gloucestershire Fire and Rescue Service – Tewkesbury Fire Cadets and the Aston Project, and she had invited young people from those organisations to take part in her Civic Service and talk about some of the things they were involved in. Councillor Mason indicated that, at Council meetings, Ruth had been a fair and impartial Chair who had managed the meetings expertly and ensured a smooth transaction of business with her usual quiet authority. He was of the view that Ruth had looked after the other Councillors like a mother hen tending her chicks, ensuring they were all well-fed after Council meetings with her home-prepared food, and felt she would be a hard act to follow with her kindness and true dedication to the Borough – although he was sure the newly elected Mayor would be up to the challenge. In summing up, Councillor Mason expressed his sadness that both Ruth and Harry had lost their seats in the recent local elections and, whilst that was democracy, they would be missed. Ruth had conducted her Mayoral year with great dignity and decorum and had been exceptionally popular out in the community and was spoken about with great affection and warmth – she had

received great support from Harry and together they had worked tirelessly with compassion and commitment making everyone feel comfortable with their quiet and relaxed way as they had hosted and attended many functions; it had been a very successful year full of great memories for the community and hopefully for Ruth and Harry.

- 3.2 Ruth thanked Councillor Mason for his kind words and indicated that it had been a fantastic year which she had thoroughly enjoyed. She expressed her thanks to all of the Officers who had supported her and her Consort in carrying out their civic duties, which had totalled 134 events, and from which they would take many memorable friendships. Some particular highlights of the year had been their visit to Belfast on behalf of Tewkesbury in Bloom to collect an award – this had not been an official Borough Council remit so they had funded the trip themselves but had had a wonderful time and had felt honoured to attend the awards ceremony on behalf of the Borough. She particularly thanked the Chief Executive for his guidance at Council meetings, the Democratic Services Team for their support and her Chaplain, Reverend Wendy Ruffle, for her individual attention and loyal support. Ruth indicated that she had enjoyed supporting both of her chosen organisations throughout her Mayoral year and hoped the money raised would go some way to supporting the young people that used the services of both the Aston Project and the Gloucestershire Fire and Rescue Service – Tewkesbury Fire Cadets. She also thanked her Consort, Harry, for driving her faithfully and safely over 300 miles on their Civic duties. In concluding her speech, Ruth also offered her thanks to everyone who had attended her events and made them such a success.
- 3.3 The Worshipful the Mayor, Councillor Gill Blackwell, presented Ruth Hatton with a Past Mayor's Badge. Harry Turbyfield presented Mike Blackwell with the Consort's Badge of Office and Mike Blackwell presented Harry Turbyfield with his Past Consort's Badge.
- 3.4 Flowers were presented to Councillor Gill Blackwell and Ruth Hatton.

CL.4 ADJOURNMENT

- 4.1 Upon the Motion of the Mayor, the meeting of the Council stood adjourned until Tuesday 28 May 2019 at 6.00pm.

CL.5 RESUMPTION

- 5.1 The meeting then resumed in the Severn Room at the Tewkesbury Borough Council Offices, Gloucester Road, Tewkesbury on Tuesday 28 May 2019, when the attendance was as follows:

Present:

The Worshipful the Mayor
Deputy Mayor

R H Hatton G F Blackwell
Councillor A S Reece

and Councillors:

R A Bird, G J Bocking, C L J Carter, C M Cody, K J Cromwell, M Dean, R D East, J H Evetts, L A Gerrard, P A Godwin, M A Gore, D J Harwood, A Hollaway, M L Jordan, E J MacTiernan, J R Mason, H C McLain, P D McLain, H S Munro, J W Murphy, P W Ockelton, C Reid, V D Smith, P E Smith, R J G Smith, J K Smith, C Softley, R J Stanley, P D Surman, M G Szymiak, S Thomson, R J E Vines, M J Williams and P N Workman

CL.6 APOLOGIES FOR ABSENCE

6.1 Apologies for absence were received from Councillors D W Gray and S A T Stevens.

CL.7 DECLARATIONS OF INTEREST

7.1 The Committee's attention was drawn to the Tewkesbury Borough Council Code of Conduct which was adopted by the Council on 26 June 2012 and took effect from 1 July 2012.

7.2 The following declaration was made:

Councillor	Application No./Item	Nature of Interest (where disclosed)	Declared Action in respect of Disclosure
K J Cromwell	Item 13 – Garden Community Programme – Garden Town Status for Tewkesbury at Ashchurch	Has a disclosable pecuniary interest.	Would not speak or vote and would leave the room for consideration of the item.

7.3 There were no further declarations of interest made on this occasion.

CL.8 MINUTES

8.1 The Minutes of the meeting held on 16 April 2019, copies of which had been circulated, were approved as a correct record and signed by the Mayor.

CL.9 ANNOUNCEMENTS

9.1 The evacuation procedure, as noted on the Agenda, was advised to those present.

9.2 The Mayor indicated that she had used her discretion to amend the order of the Agenda so point 3 under Item 11 would be taken as point 1; the remaining items would follow consecutively.

CL.10 ITEMS FROM MEMBERS OF THE PUBLIC

10.1 There were no items from members of the public on this occasion.

CL.11 MEMBER QUESTIONS PROPERLY SUBMITTED IN ACCORDANCE WITH COUNCIL PROCEDURE RULES

11.1 There were no Member questions on this occasion.

CL.12 STATE OF THE BOROUGH PRESENTATION

12.1 The Mayor invited the Leader of the Council for the 2018/19 Council year, Councillor R A Bird, to present his 'State of the Borough' report.

12.2 The presentation covered the following key points:

- Introduction – the State of the Borough presentation provided an annual synopsis of the Council's achievements in the last year and a way forward for the forthcoming year. Currently the Council was at the end of the third year of the 2016-2020 Council Plan, as such, work would commence on the new Council Plan towards the end of this year. The overarching achievement was the fact that the Council Tax remained one of the lowest in the country; it seemed that the Council was an expert at doing more with less and had been successful in reinventing itself to be more flexible and innovative in how it approached its finances.
- Year Three Achievements: Finance and Resources – the Council had a property portfolio of £39.5 million which generated an annual gross income of £2.4 million. In addition, the Council Offices building had been revamped and its nature changed to ensure it was possible to gain income from the lettable spaces and that had achieved income of £270,000 per year and was a boost to the Council's finances. Mace Group Ltd, which was a company that specialised in redevelopment, had been appointed to explore the options for Tewkesbury Town Centre; a new commercialisation strategy had been approved which would explore new income generation initiatives and efficiency savings and a new car pool pilot had been launched which would reduce mileage and emissions, remove unnecessary journeys and combine trips to save time, money and the environment.
- Year Three Achievements: Promoting and Supporting Economic Growth – the new Growth Hub was now operational – with Tewkesbury Borough being the first Council in the country to incorporate a Growth Hub within its main Council building – the Growth Hub sought to offer an open invitation to businesses to come and make use of the facilities and the support it could provide. In addition, 30 projects had been approved under the 'LEADER' Project Scheme which had a total value of over £755,000 across Tewkesbury Borough and the Forest of Dean District; the concept masterplan for Junction 9 of the M5 had been approved for consultation; an all-ways Junction 10 business case had been submitted to the government – this was seen as being exceptionally important for driving the economic growth of the Borough; and the Tewkesbury Town Supplementary Planning Document (SPD) had been consulted upon and was to be considered by the Council.
- Year Three Achievements: Growing and Supporting Communities – it was felt the Council was good at influencing government to help it develop its area for the benefit of local residents and this was demonstrated by the achievement of Garden Town status being one of only five locations to receive that award. The preferred options for the Tewkesbury Borough Plan had been approved and consulted upon; the Joint Core Strategy (JCS) initial issues and options consultation had taken place; the 2018/19 target of delivering 200 affordable homes had been exceeded; and 14 neighbourhood areas had been designated across 16 Parishes.

- Year Three Achievements: Customer-Focussed Services – the Council had an average recycling rate of 55% for 2018/19; the garden waste club had continued its success with over 16,000 sticker licences having been purchased and a resulting income in excess of £800,000; residents were now able to pay for a variety of services via Paypoint which made paying bills more accessible for all; new performance indicators for the planning service had been introduced to support the planning improvement action plan; the Council continued to support the Citizens' Advice Bureau with a £52,000 grant; new websites had been developed on behalf of key partners including the JCS, Building Control and Tewkesbury Town Regeneration Partnership; a community services restructure had been undertaken to support the place approach; and a proactive stance was being taken against enviro-crimes.
- Looking Forward to 2019/20 – the Council would have a real focus on delivering commercial activity; delivery of the Garden Town programme and maximising growth potential would be a priority, along with the adoption of the Borough Plan and regeneration of Tewkesbury Town. In addition, the Council's place approach would be delivered; the Growth Hub services would be maximised; and the Council would be delivering new ICT and digital strategies.

12.3 The Mayor thanked the Leader for his informative presentation and it was

RESOLVED That the 'State of the Borough' presentation provided by the Leader of the Council for the Council year 2018/19 be
NOTED.

CL.13 ELECTION OF LEADER OF THE COUNCIL

13.1 Upon being proposed and seconded it was

RESOLVED That Councillor R A Bird be elected as Leader of the Council, and therefore Chair of the Executive Committee, for the ensuing Municipal Year.

13.2 Councillor Bird thanked the Council for having confidence in him and undertook to perform his role as Leader in accordance with their expectations.

CL.14 ELECTION OF DEPUTY LEADER OF THE COUNCIL

14.1 Upon being proposed and seconded it was

RESOLVED That Councillor J R Mason be elected as Deputy Leader of the Council, and therefore Vice-Chair of the Executive Committee, for the ensuing Municipal Year.

14.2 Councillor Mason thanked the Council for his appointment and promised to fulfil the role to the best of his ability for the good of the Council and the Borough of Tewkesbury.

CL.15 APPOINTMENT OF DEPUTY MAYOR

15.1 It was proposed and seconded that Councillor A S Reece be appointed Deputy Mayor of the Borough of Tewkesbury for the ensuing Municipal Year.

15.2 Accordingly, it was

RESOLVED That Councillor A S Reece be appointed as Deputy Mayor for the ensuing Municipal Year.

CL.16 MEMBERSHIP OF COMMITTEES, WORKING GROUPS, PANELS AND BOARDS, LEAD MEMBERS AND APPOINTMENT TO OUTSIDE BODIES**Report from the Leader of the Council**

16.1 The Leader of the Council indicated that, as part of the Constitution, he was required to report at the Annual Council meeting on the number of Lead Members, and the scope of their Portfolios for the coming year, and any other matters in relation to the political management of the Council. He proposed that the number of Lead Members increase from nine to 11 with a Support Member for each and these were set out on the chart which had been circulated around the table. He indicated that this would reflect the change of the make-up of the Council and promote the Council's long-held tradition of working effectively together irrespective of political labels; it should also help to spread the workload more evenly, taking account of the significant changes to the Council's priorities.

16.2 Accordingly, it was

RESOLVED

1. That the Leader's report be **NOTED**.
2. That the number of Lead Members be increased from nine to 11 with the names of Lead Members and their portfolios being as set out below:
 - Councillor R A Bird – Leader / Economic Development/Promotion.
 - Councillor G F Blackwell – Housing.
 - Councillor M Dean – Customer Focus.
 - Councillor L A Gerrard – Organisational Development.
 - Councillor M A Gore – Built Environment.
 - Councillor E J MacTiernan – Commercial Transformation.
 - Councillor J R Mason – Clean and Green Environment.
 - Councillor C Softley – Community.
 - Councillor R J Stanley – Health and Wellbeing.
 - Councillor M G Sztymiak – Corporate Governance.
 - Councillor R J E Vines – Finance and Asset Management.

Membership of Committees 2019/20

16.3 Upon being proposed and seconded it was

RESOLVED

That the following Committee Memberships be **AGREED**:

Executive (11)

R A Bird
G F Blackwell
M Dean
L A Gerrard
M A Gore
E J MacTiernan
J R Mason
C Softley
R J Stanley
M G Sztymiak
R J E Vines

Planning (19)

R A Bird
G F Blackwell
R D East
J H Evetts
M A Gore
D J Harwood
A Hollaway
M L Jordan
E J MacTiernan
J R Mason
P W Ockelton
A S Reece
P E Smith
R J G Smith
S A T Stevens
P D Surman
R J E Vines
M J Williams
P N Workman

Standards Committee (7)

C M Cody
M Dean
L A Gerrard
J W Murphy
C Reid
P E Smith
P D Surman

Licensing Committee (15)

G F Blackwell
G J Bocking
C L J Carter
P A Godwin
D W Gray
M L Jordan
E J MacTiernan
J W Murphy
P W Ockelton
C Reid
J K Smith
R J G Smith
C Softley
M G Sztymiak
M J Williams

Overview and Scrutiny (15)

G J Bocking
C L J Carter
K J Cromwell
P A Godwin
H C McLain
P D McLain
H S Munro
J W Murphy
P W Ockelton
J K Smith
R J E Smith
S A T Stevens
P D Surman
M J Williams
P N Workman

Audit & Governance (9)

C M Cody
K J Cromwell
L A Gerrard
P A Godwin
H C McLain
P D McLain
H S Munro
P E Smith
V D Smith

AD HOC COMMITTEES**Employee Appeals Committee
(any 5 from 8)**

R A Bird
G F Blackwell
A Hollaway
J R Mason
P D McLain
A S Reece
P D Surman
M J Williams

**Employee
Appointments/Disciplinary (5)**

K J Cromwell
M Dean
M A Gore
E J MacTiernan
R J E Vines

**Horsford Trust Management
Committee**

(Committee of Councillors
representing the Tewkesbury
Wards)
C M Cody
K J Cromwell
C Reid
V D Smith
M G Sztymiak
P N Workman

**Gloucestershire Police and Crime
Panel**

D W Gray
A S Reece (Reserve)

**Shared Legal Services Joint
Monitoring and Liaison Group**

Lead Member (*Corporate
Governance*)
E J MacTiernan
M A Gore (substitute)
H C McLain (substitute)

**Shared Building Control Joint
Monitoring and Liaison Group**

Lead Member (*Built Environment*)
R D East

Working Groups, Boards and Panels 2019/20

16.4

The Leader of the Council indicated that the Devolution Working Group was no longer required and, as such, would be disbanded. Upon being proposed and seconded, it was

RESOLVED

That the following Working Groups, Boards and Panels membership be **AGREED**:

**Flood Risk Management
Group (8)**

**Established 09.06.10. Re-
established 28 May 2019.**
Lead Member for Clean and
Green Environment Plus 7

C M Cody
K J Cromwell
E J MacTiernan
V D Smith
C Softley
M G Sztymiak
M J Williams

**Planning Policy Reference
Panel (10)**

**Established 25.11.11.
Amended 16.05.17. Re-
established 28 May 2019.**
Lead Member for Built
Environment Plus 9

R A Bird
G F Blackwell
C Cody
M Dean
R D East
L A Gerrard
E J MacTiernan
P W Ockelton
C Reid

**Community Infrastructure
Levy Working Group (7)
Established 04.12.12. Re-
established 28 May 2019.**

R A Bird
G F Blackwell
M A Gore
A S Reece
C Softley
R J Stanley
R J E Vines

**Commercial Investment
Board (6)
Established by Executive
Committee 23.11.16. Re-
established 28 May 2019.**

R A Bird
K J Cromwell
D W Gray
E J MacTiernan
R J G Smith
R J E Vines

**Tewkesbury Borough Plan
Working Group (7)
Established by Executive
Committee 26.04.17. Re-
established 28 May 2019.**

Lead Member for Built
Environment
Lead Member for Economic
Development/Promotion Plus
5

C M Cody
R D East
P W Ockelton
A S Reece
P D Surman

**Transform Working Group
(14)
Established 30.04.14.
Amended 16.05.17. Re-
established 28 May 2019.**

Executive Committee Plus 3

K J Cromwell
H C McLain
V D Smith

**Spring Gardens and Oldbury
Road Regeneration Member
Reference Group (10)
Established by Executive
Committee 06.04.16. Re-
established 28 May 2019.**

C M Cody
K J Cromwell
M Dean
P A Godwin
M A Gore
E J MacTiernan
C Reid
V D Smith
M G Sztymiak
P N Workman

**J9 Area Member Reference
Panel – NEW WARDS (11)
Established by Executive
Committee 15.10.14. Re-
established 28 May 2019.**

Leader of the Council
Lead Member for Economic
Development/Promotion
Lead Member for Built
Environment
Lead Member for Community
2 Ward Members for Northway
2 Ward Members for
Tewkesbury East
2 Ward Members for Isbourne
1 of the Ward Members for
Tewkesbury Town with Mitton –
M G Sztymiak

Outside Bodies 2019/20

16.5 Upon being proposed and seconded, it was

RESOLVED That the following Outside Bodies representation be
AGREED:

2gether NHS Foundation Trust (<i>observer</i>)	J K Smith
A46 Member Partnership	V D Smith
A48 Meeting	J K Smith
Ambulance Trust (<i>observer</i>)	Vacancy
Cleeve Common Trust	R D East
Cotswolds AONB Conservation Board	M Dean
District Councils Network	Leader of the Council
Gloucester and District Citizens' Advice Bureau	C Softley
Gloucestershire Airport Consultative Committee	M J Williams
Gloucestershire Hospitals NHS Foundation Trust (<i>observer</i>)	G J Bocking
Gloucestershire Playing Fields Association	M A Gore
Leadership Gloucestershire	Leader of the Council Deputy Leader of the Council (Reserve)
Local Government Association	Leader of the Council <i>* should the Leader of the Council be unable to attend the Annual Local Government Association Conference in any year, authority will be delegated to the Chief Executive, in consultation with the Leader, to appoint a representative to attend.</i>
Lower Severn (2005) Internal Drainage Board	M J Williams
Parking and Traffic Regulations Outside London (PATROL) Adjudication Joint Committee	K J Cromwell J R Mason (Reserve)

Prior's Park Neighbourhood Project	K J Cromwell
Roses Theatre Trust	A Hollaway
South West Councils	Leader of the Council M Dean (Deputy)
South West Councils – Employers Panel	M Dean
Tewkesbury District Twinning Association Management Committee	K J Cromwell
Tewkesbury Leisure Centre Partnership Board	Lead Member (<i>Health and Wellbeing</i>) Lead Member (<i>Finance and Asset Management</i>)
Tewkesbury Regeneration Partnership	Lead Member (<i>Economic Development/Promotion</i>) E J MacTiernan P N Workman
Winchcombe Sports Hall Management Committee	J W Murphy

Chairs and Vice-Chairs, County Council Health and Care Scrutiny Committee and Gloucestershire Economic Growth Scrutiny Committee

16.6 A short meeting of each of the main Committees set out in Paragraph 16.3 took place to elect a Chair and Vice-Chair. The Overview and Scrutiny Committee also elected representatives to the County Council's Health and Care Overview and Scrutiny Committee and Gloucestershire Economic Growth Scrutiny Committee and the Grounds Maintenance Working Group. Accordingly, it was

RESOLVED 1. That the Chairs and Vice-Chairs for each Committee be **AGREED** as follows:

Overview and Scrutiny Committee

Chair – Councillor K J Cromwell

Vice-Chair – Councillor J W Murphy

Audit & Governance Committee

Chair– Councillor V D Smith

Vice-Chair – Councillor H C McLain

Planning Committee

Chair – Councillor J H Evetts

Vice-Chair – Councillor R D East

Licensing Committee

Chair – Councillor G J Bocking

Vice-Chair – Councillor E J MacTiernan

Standards Committee

Chair – Councillor P D Surman

Vice-Chair – Councillor M Dean

2. That Councillor J K Smith be the Council's nominated representative on the County Council's Health and Care Overview and Scrutiny Committee; there was no nominated reserve.
3. That Councillor J W Murphy be the Council's nominated representative on the Gloucestershire Economic Growth Scrutiny Committee; there was no nominated reserve.
4. That Councillors K J Cromwell, P D Surman, M J Williams and P N Workman, along with the Lead Member for Clean and Green Environment, comprise the Grounds Maintenance Working Group.

CL.17 MAYOR OF TEWKESBURY'S APPEAL FUND

17.1 It was proposed, seconded and

RESOLVED That Councillors M A Gore, E J MacTiernan and J R Mason be appointed as Trustees of the Mayor of Tewkesbury's Appeal Fund for 2019/20.

CL.18 GARDEN COMMUNITY PROGRAMME - GARDEN TOWN STATUS FOR TEWKESBURY AT ASHCHURCH

18.1 The report of the Head of Development Services, circulated at Pages No. 12-17, advised Members that the Council had been successful in its bid for Garden Town Status for Tewkesbury at Ashchurch. Members were asked to make the necessary decisions to put in place arrangements for the delivery of the Garden Town for Tewkesbury at Ashchurch as part of the government's Garden Communities Programme.

18.2 The Head of Development Services explained that, in August 2018, the government had announced a third round of its Garden Communities Programme and local authorities had been invited to bid for Garden Community Status. Tewkesbury Borough Council had submitted its bid based on the concept masterplan for Ashchurch. In April 2019, the Council had heard that its bid had been successful which would allow the Council to engage additional resources to develop the garden community. Further reports and presentations would be made on the programme in due course but this report was the first stage of what promised to be an extremely exciting opportunity.

18.3 In proposing the recommendation within the report, the Leader of the Council felt this was an exciting opportunity for the Borough and was a huge project. He considered it to be a considerable achievement to have been awarded Garden Community Status and the report before the Council was an important element, and necessary step, to ensure the initial work was undertaken and effectively delivered to progress the project. In seconding the proposal, the Deputy Leader felt this was an exciting opportunity to develop a twenty first century town for twenty first century living without exacerbating problems in existing communities. A Member suggested an amendment, which was agreed by the proposer, so the third recommendation would read '*...are to be made by the Council and those that relate to the determination of any planning applications) to ~~deliver~~ develop the necessary plans to support the delivery of the Garden Town for Tewkesbury at Ashchurch...*'. In response to a query, the Chief Executive advised that the Member making the amendment wanted to ensure the resolution at this stage was about development of plans rather than actual development which was perfectly acceptable; for that reason, the project would remain within the remit of the Executive Committee as set

out within the report.

- 18.4 During the discussion which ensued, a number of Members questioned what the outcome of the consultation on the Ashchurch masterplan had been; they considered that it would be difficult to make a decision on the current project without having seen the results of that important consultation. In response, the Head of Development Services advised that the Garden Town programme and the Ashchurch masterplan were separate processes which had just so happened to start to align. The Ashchurch masterplan consultation had closed approximately two months ago and Officers were still going through the responses to bring to Members. In terms of the area of the designation, Officers would be in conversation with all stakeholders across the entire site. The Ashchurch masterplan looked at a phasing strategy for development which was not prescriptive so it was impossible to say at this stage whether the Ministry of Defence (MoD) site or other greenfield/brownfield sites would come forward first. In terms of capacity funding and other government funding, the Head of Development Services advised that the Council had received £750,000 for the Garden Town funding and almost £500,000 from the Local Sites and Infrastructure Fund.
- 18.5 In respect of the amount of development suggested for the area, the Head of Development Services explained that, in the broader masterplan, there was consideration given to the different elements involved, the amount of development that was possible and the amount that would be required for the Garden Town bid and a broad discussion had been held in relation to one-bed, two-bed properties etc. The work undertaken had been very indicative and had looked at the potential in line with JCS policies; that detail was not in the masterplan but was in the concept of design within the JCS.
- 18.6 There was a lot of concern expressed about the fact that the Council's membership had changed by almost half at the recent local elections and this was the first time that many Councillors would have heard anything at all about this important project, so it may have been helpful to include a map to show them where the site in question was located. In response, the Head of Development Services indicated that the current report was about the governance arrangements of the project rather than the detail of the masterplan which was why there was no map included. She felt it was important to recognise the fantastic opportunities offered by being part of the Garden Communities Programme and, accepting that the report was not about planning status, the recommendations within the report would help move the project forward and investigate the opportunities which may be available. There would be consultation going forward and that would include Parishes which could be affected more widely than just those in the immediate area, including Bishop's Cleeve Parish Council. There was concern expressed by Members that asking the Council to make a decision at this stage was too soon and that more information was needed before a fully informed decision could be made. In response, the Chief Executive indicated that he understood the concerns expressed but reminded the Council that the government was looking for a commitment from Councils that they wanted to be in the Garden Communities Programme. It was understood that the Council needed government support for off-line improvements to the A46 and it was felt that Garden Town Status should help with that. At this stage, the Council had been invited by government to attend induction meetings in June and July in respect of the Garden Communities Programme and, through that process, the government was looking for commitment to be demonstrated by Councils. The reason for the current report was to set up the initial governance arrangements and Members would be fully involved in the details of the project going forward. He offered reassurance that the Council was not committing to anything in terms of the shape of the area at this stage and there would be many more discussions going forward; the purpose of the Garden Town bid was to get ahead of speculative development, to try and shape

the major development of the Borough and get exemplar development. The programme was likely to run to at least 2050 so it had to be right.

- 18.7 In response to a query regarding the funding, the Head of Development Services confirmed that the Council would have to demonstrate it had done all it could to try and provide an opportunity for development in order that it would not have to return the funding if development was not achieved for any reason. It was important to remember this was a long-term plan and the Council would need to maintain a relationship with the government and demonstrate there was an emphasis on bringing sites forward. In addition, the Chief Executive explained that the government was reluctant to confirm whether further funding would be available, but the Council had been advised that any additional funding would be performance related, so the Council would be expected to move it forward. He felt it was important to remember that, when achieving something like growth, the pieces of the jigsaw did not always come in the right order but, as particular pieces were important in the wider context, they had to be taken as they were available. There was debate about the possible opportunities that may be lost if the Council delayed a decision on this matter and, in response, the Head of Development Services explained that, if the Council could not demonstrate its commitment to the programme, it would not be able to take part as that was what the government was looking for at this stage. In addition, the Chief Executive advised that one of the issues was that the initial tranche of funding would help set up a programme team and Homes England would expect to see this happening as quickly as possible; if this could not be agreed it would be impossible to put a programme team into place as the Council did not have the internal resources to do so. A Member noted that, whilst the Leader and Deputy Leader had indicated that this was an exciting opportunity, he felt residents who had previously flooded would see it as a worrying and frightening development as it was the water flowing from the east of the town which flooded areas such as Newtown. He also felt the J9 Area Member Reference Group had been presented with the bid rather than having any say in whether or not a bid should have been made. In response, the Leader of the Council asked Members to remember that this was not about plan-making at this stage; however, it was an exciting opportunity to set in place structures to allow plan-making in the right way, in the long-term, to meet the demand for housing. The report was not about planning but was about using the funding effectively to move forward and start the planning process and authorising the correct people to work on the plan. Another Member agreed with this view and indicated that, even though he was a new Member, he did not think the decision was rushed as Councillors and Officers had put a lot of work into this already in terms of the bid. He understood there was a need to develop capacity for the Council to be able to obtain the answers as to whether development in the area was the correct way forward. He felt concerns about flooding gave all the more reason to take the funding and move forward with the investigations.
- 18.8 The Member who had proposed the amendment confirmed that her reason for the amendment was to make it very clear that the current stage was not about delivery but about support for planning for the development. It was generally agreed that a seminar was required for all Members to be brought up to speed on the project and Officers undertook to ensure that was actioned as soon as possible.
- 18.9 It was proposed and seconded that consideration of the report be deferred to allow for Members to attend a seminar and gain a more thorough understanding of the issues. Upon being put to the vote, the proposal was lost. Accordingly, it was proposed, seconded and

RESOLVED

1. That authority be delegated to the Chief Executive, in consultation with the Leader of the Council, Lead Member for Built Environment and the S151 Officer, to use the capacity funding to fund resources (including recruitment of key staff) and associated work, to help develop the necessary plans to support the delivery of the Garden Town programme for Tewkesbury at Ashchurch.
2. That it be **NOTED** that Officers will continue work to develop a delivery programme in relation to the Garden Town for Tewkesbury at Ashchurch in discussion with Members (through the established Tewkesbury Borough Council governance structure), along with the relevant key stakeholders including Homes England, the local community, the parishes, Wychavon District Council, the highways authorities, and the relevant landowners/developers.
3. That authority be delegated to the Executive Committee to make all necessary decisions, along with establishing appropriate governance structures (other than those that, as a matter of legislation, are to be made by the Council and those that relate to the determination of any planning applications), to develop the necessary plans to support the delivery of the Garden Town for Tewkesbury at Ashchurch and, if successful, to make all necessary decisions to deliver the West Cheltenham Garden Village and receive further status reports as each project progresses.

CL.19 DOWN HATHERLEY, NORTON & TWIGWORTH NEIGHBOURHOOD DEVELOPMENT PLAN

- 19.1 The report of the Planning Policy Manager, circulated at Pages No. 18-58, explained that the Down Hatherley, Norton and Twigworth Neighbourhood Development Plan had been the subject of a referendum in the local area and the Council was now asked to resolve that the Plan be made part of the Development Plan for Tewkesbury Borough; and to delegate to the Head of Development Services, in agreement with the Parish Council acting as the Qualifying Body, the correction of any minor errors such as spelling, grammar, typographical errors that did not affect the substantive content of the Plan.
- 19.2 The Head of Development Services explained that the Plan had received the required majority in favour at referendum and it was the Council's duty to agree that the Plan be made part of the Development Plan for Tewkesbury Borough.

19.3 Upon being proposed and seconded, it was

RESOLVED

1. That the Down Hatherley, Norton & Twigworth Neighbourhood Development Plan be made part of the Development Plan for Tewkesbury Borough.
2. That authority be delegated to Head of Development Services, in agreement with the Parish Council acting as the Qualifying Body, to correct any minor errors such as spelling, grammar, typographical or formatting errors that do not affect the substantive content of the plan

CL.20 SEPARATE BUSINESS

20.1 The Mayor proposed, and it was

RESOLVED That, under Section 100(A)(4) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely discussion on exempt information as defined in Part 1 of Schedule 12A of the Act.

CL.21 SEPARATE MINUTES

21.1 The separate Minutes of the meeting held on 16 April 2019, copies of which had been circulated, were approved as a correct record and signed by the Mayor.

The meeting closed at 8:35 pm

TEWKESBURY BOROUGH COUNCIL

Report to:	Council
Date of Meeting:	30 July 2019
Subject:	Pre-Submission Tewkesbury Borough Plan
Report of:	Head of Development Services
Corporate Lead:	Deputy Chief Executive
Lead Member:	Councillor M A Gore
Number of Appendices:	One

Executive Summary:

The Tewkesbury Borough Plan (TBP), as the Borough's second tier plan, is being prepared to complement the Joint Core Strategy (JCS) to provide a framework for development in Tewkesbury Borough to 2031.

The Member Working Group report (attached to this report) seeks Council approval for the publication of the Pre-Submission version of the TBP under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 as the version to be submitted to the Secretary of State for independent examination. This report highlights Officers' support for the contents and recommendation in the Member Working Group report with the exception of the proposed inclusion of site (SHU4): Land south of Badgeworth Lane at Shurdington, and the changes to the Green Belt boundary consequent upon this proposed inclusion.

Recommendation:

That Council

- 1. Having considered the Member Working Group report and Officer advice,**
 - a. determines whether or not site SHU4 should be included within the Pre-submission Tewkesbury Borough Plan.**
 - b. approves the Pre-submission Tewkesbury Borough Plan for publication under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012; the version of the Tewkesbury Borough Plan proposed to be submitted to the Secretary of State for independent examination.**
- 2. Delegates authority to the Head of Development Services, in consultation with the Lead Member for Built Environment, to make any necessary minor amendments prior to;**
 - i. publication of the Pre-Submission Tewkesbury Borough Plan; and**
 - ii. submission of the Tewkesbury Borough Plan for independent examination.**

Reasons for Recommendation:

To agree the Pre-Submission Tewkesbury Borough Plan for publication and submission to examination and enable the Council to progress the TBP to adoption to help meet our identified growth needs.

Resource Implications:

The preparation of the Pre-Submission Tewkesbury Borough Plan has already involved a significant amount of Officer resource from within the Planning Policy team as well as support from the wider Council.

Approval of the document for publication will involve Officer time in undertaking the consultation, organising and advertising the plan, attending consultation events, and analysing responses. The subsequent submission and examination of the plan will require further significant resource in terms of Officer time but also additional financial resource to meet the costs of undertaking the examination.

Legal Implications:

The Council is required to have an up to date local plan (development plan documents) for its area and must prepare it in accordance with legislative requirements, including ensuring the compliance with the Statement of Community Involvement, and must contain a reasoned justification for the policies contained in it.

The development plan for Tewkesbury Borough is made up of the development plan documents which have been adopted or approved in relation to its area and the neighbourhood development plans which have been made in relation to that area.

If to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted or made (as the case may be).

Legislation requires that where a development plan document contains a policy that is intended to supersede another policy in the adopted development plan, it must state that fact and identify the superseded policy.

Under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 before submitting a local plan to the Secretary of State for independent examination the Council must make a copy of all the proposed submission documents and a statement of representations procedure available via: their website; their principal office and such other places within their area as they consider appropriate; for a period of at least six weeks.

The proposed submission documents are to be the local plan which the Council proposes to submit to the Secretary of State; a submission policies map where the local plan if adopted would result in changes to the adopted policies map; a sustainability appraisal report of the local plan; a statement setting out the consultations already undertaken prior to the regulation 19 publication stage; a summary of the main issues raised by those representations and how those main issues have been addressed in the Pre-Submission local plan; and such supporting documents as in the opinion of the local planning authority are relevant to the preparation of the local plan.

The statement of representations procedure must include the date by which representations about the local plan must be received and the address to which representations about the local plan must be made (representations may be made in writing or by way of electronic communications).

In addition to the proposed submission documents, on submission for independent examination the Council must also send a statement setting out as regards the Regulation 19 Pre-Submission publication, the number of representations received in accordance with the representations procedure, copies of those representations and a summary of the main issues raised in those representations.

Risk Management Implications:

Failure to progress the Tewkesbury Borough Plan will have an adverse impact on the Borough's ability to provide sufficient sites for housing and employment growth to meet the requirements set out within the adopted Joint Core Strategy.

While the JCS sets out strategic policies, the Borough Plan is required to provide the locally specific policies and guidance that will help guide and determine proposals for new development in the area. Without these policies the Borough Council is in a weaker position in ensuring that new development is of a high quality, is sustainable and meets our objectives for growth in the Borough, in support of the rural area and in implementing the housing and economic objectives of the Council

The Borough Plan is also critical to identify the smaller-scale site allocations for housing and employment, particularly in the Borough's rural settlements. In regards to housing sites, this is vital to ensure that the Council can maintain a five year supply of land. If the Council cannot demonstrate a five-year supply then its local plan policies may be considered out of date. This could result in a more unplanned approach to development, leading to inappropriate and incremental development being allowed on appeal that does not take account of requirements for supporting infrastructure, with the potential for adverse environmental impacts.

Performance Management Follow-up:

The Pre-Submission TBP will be published for public consultation and subsequently will be submitted to the Secretary of State for an independent examination. The Planning Inspectorate will appoint an Inspector to undertake this examination which will be publicly conducted and will involve public examination hearing sessions. As a result of the examination the Inspector may recommend main modifications be made to the plan in order to make it sound. Any proposed modifications will be brought back to the Council for approval and subject to further public consultation. Ultimately, if the plan is found to be sound by an Inspector then the Council will be in a position to adopt the plan.

Environmental Implications:

The Tewkesbury Borough Plan must go through a sustainability appraisal process and Habitats Regulation Assessment (HRA) which consider the environmental, social and economic outputs of the Plan and ensures that development meets the needs of both present and future generations. The Sustainability Appraisal supporting the Pre-Submission TBP encompasses Strategic Environmental Assessment as required by EU Directive (2001/42/EC). In addition the Habitats Regulations Assessment has been undertaken as required under the European Directive 92/43/EEC on the "conservation of natural habitats and wild fauna and flora for plans" that may have an impact on European (Natura 2000) Sites. The TBP also contains policies to protect and enhance the environment of the Borough.

1.0 INTRODUCTION/BACKGROUND

- 1.1 This report is a covering report and should be read in conjunction with the Tewkesbury Borough Plan Member Working Group report which is attached to this report at Appendix 1. The Member Working Group report sets out the key issues relating to the history, production and assessment of issues in respect of the Plan. Officers agree with the advice in that report except for one issue which is the focus of this report; the removal of a site (SHU4) from the Green Belt at Shurdington and its proposed allocation for housing development.

2.0 OFFICER ADVICE ON WORKING GROUP REPORT

- 2.1 Paragraph 4.15 of the Member Working Group Report states that it is the view of the group that the National Planning Policy Framework (NPPF) allows for a Local Planning Authority (LPA) to remove areas from the Green Belt through the preparation of a local plan in order to meet its identified development needs. While the NPPF does provide this opportunity, the full wording of the NPPF (paragraph 136 and 137) states that:

“Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.

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

- 2.2 Exceptional circumstances are required to justify the removal of sites from the Green Belt through the plan making process. Furthermore, there is a requirement for the LPA to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.
- 2.3 Parcels of land at Shurdington are proposed, by the Working Group, to be removed from Green Belt to provide for residential development. The provision of new housing at the village has been highly constrained as it is surrounded by Green Belt. This means that any growth at the village would necessitate removal of land from the Green Belt to facilitate this. Two allocations, SHU1 and SHU2, are considered to present exceptional circumstances as they would enable the delivery of housing at this sustainable settlement identified as a Service Village by the JCS. Furthermore, assessment of these sites has judged that their removal from the Green Belt would result in a low-moderate level of harm and the sites are well related to existing built development at the village.
- 2.4 Further Green Belt removal is included in the plan to provide for a housing allocation at site SHU4: Land south of Badgeworth Lane at Shurdington (with a site area of 6.6 ha and an indicative capacity of 110 dwellings). The Officer advice is that this site should not be included and is unlikely to be considered ‘sound’ at examination as it does not present exceptional circumstances. Assessment for the site deemed its removal to have a moderate harm and it is not as well related to the existing village, forming an extension beyond the current extent of built development. Furthermore, Environmental Health advises against the allocation of SHU4 arising from potential noise and dust associated with the existing aggregates recycling business located adjacent to the site. Strong objections to the proposed allocation of this site have been received from parish councils, local residents and other interest groups.
- 2.5 At paragraph 4.16 of the Member Working Group report it is noted that the Member Working Group considers that Shurdington has an identified housing need of 141 in the JCS plan period 2011-31. Furthermore, the Member Working Group considers that site SHU4 should be allocated as part of the overall proposal, as without it, Shurdington cannot achieve its identified housing need, and the Member Working Group considers that this constitutes exceptional circumstances as defined by the NPPF.

- 2.6 The advice of Officers is that the figure of 141 homes attributed to Shurdington does not constitute an ‘identified need’ in accordance with paragraphs 136 and 137 of the NPPF and therefore cannot be used to justify exceptional circumstances. The identified need for development at Service Villages is set out through Policy SP2 of the JCS which states that the Service Villages will accommodate in the order of 880 new homes. The 880 is across all of the 12 identified Service Villages and is not broken down to an individual requirement for each settlement.
- 2.7 Through the development of the Tewkesbury Borough Plan, as a means of disaggregating the 880 dwelling need, an ‘indicative requirement’ was produced for each village based on their size, function and accessibility. This disaggregation process produced a figure of 141 for Shurdington. This process was undertaken as set out through the Preferred Options Housing Background Paper (September 2018) to provide an indication of the level of development that may be accommodated at each village. It does not factor in the constraints that may exist at a given location, nor the availability and suitability of sites. It is therefore recognised that the figures serve only to provide an indication, against which further refined exploration of the potential for growth needs to be considered and that villages may exceed/not meet this indicative figure depending on this. To put it in context, the paragraph 4.7 of the Housing Background Paper states:
- “...it must be stressed that the disaggregation process is only the starting point for considering an appropriate level of development for each rural settlement. In addition to the ‘top down’ approach of the disaggregation process, there should also be a ‘bottom up’ element whereby the availability of sustainable sites at each settlement will also be a factor in determining the most appropriate distribution of development. For example, there may be situations where a settlement is unable to achieve its disaggregated requirement due to a lack of suitable, sustainable sites. Conversely, there may also be situations where a settlement can exceed its disaggregated requirement due to suitable, sustainable sites being available at the settlement. This will however need to be balanced alongside the size, function and accessibility of the settlement in order to achieve a sustainable pattern of development and avoid issues associated with social cohesion. This approach is considered to be consistent with the aim of Policy SP2 for the levels of development in the rural settlements to be proportional to their size and function and reflecting their accessibility to Cheltenham and Gloucester (the top down element) and taking into account the environmental, economic and social impacts (the bottom up element).”*
- 2.8 The indicative requirements presented for the Service Villages, and Rural Service Centres, are not set in policy and do not constitute an identified need.
- 2.9 In determining exceptional circumstances as set out by the NPPF, the correct approach is that the identified needs set out through JCS Policy SP2 must be considered. Without SHU4, when added to existing commitments, the other allocations in the plan would cumulatively provide 2,046 homes at the Rural Service Centres and 1,043 at Service Villages. This amount of growth exceeds the minimum requirement of 1860 and 880 homes respectively for those locations through JCS Policy SP2. Therefore, Officers consider that the SHU4 allocation cannot be justified as being required to meet the identified need for development as set out by the NPPF.
- 2.10 Given the lack of exceptional circumstances, the more harmful impact on the Green Belt that would occur through its release, the potential pollution issues and the nature of objection revealed through the consultation, it is recommended that site SHU4 is not included in the Pre-Submission Tewkesbury Borough Plan.

3.0 RELEVANT COUNCIL POLICIES/STRATEGIES

- 3.1 Tewkesbury Borough Council Plan (2016-2020).
Adopted Joint Core Strategy (December 2017).
Adopted Tewkesbury Borough Local Plan to 2011 (March 2006).
Economic Development & Tourism Strategy (2017-2021).
Housing Strategy (2017-2021).

4.0 RELEVANT GOVERNMENT POLICIES

- 4.1 The National Planning Policy Framework.

5.0 RESOURCE IMPLICATIONS (Human/Property)

- 5.1 Approval of the document for publication will involve Officer time in undertaking the consultation, organising and advertising the plan, attending consultation events, and analysing responses. The subsequent submission and examination of the plan will require further significant resource in terms of Officer time but also additional financial resource to meet the costs of undertaking the examination.

6.0 SUSTAINABILITY IMPLICATIONS (Social/Community Safety/Cultural/ Economic/ Environment)

- 6.1 The Tewkesbury Borough Plan must go through a Sustainability Appraisal/Strategic Environmental Assessment process and Habitats Regulation Assessment, which considers the environmental, social and economic outputs of the Plan and ensures that development meets the needs of both present and future generations.

The Sustainability Appraisal (integrating Strategic Environmental Assessment; Health Impact Assessment & Equality Impact Assessment) Non-Technical Summary can be viewed here:

https://tewkesburyborough-my.sharepoint.com/:b:/g/personal/website_tewkesburyborough_onmicrosoft_com/ES311ZlunylKjwaUXhn4TTkB8DrbJL9bGRqh4qMVIDdosA?e=E8VWxh

7.0 IMPACT UPON (Value For Money/Equalities/E-Government/Human Rights/Health And Safety)

- 7.1 Each version of the Tewkesbury Borough Plan will be accompanied by a full range of assessments which will address equalities and other issues.

8.0 RELATED DECISIONS AND ANY OTHER RELEVANT FACTS

8.1 September 2018 – approval by Council of the Preferred Options Tewkesbury Borough Plan Regulation 18 consultation.

October 2017 – approval by Executive Committee of the updated Local Development Scheme for Tewkesbury Borough.

February 2015 – approval by Council of Draft Policies and Sites Options Tewkesbury Borough Plan.

July 2014 – approval by Council of Tewkesbury Borough Plan Regulation 18 Scoping Summary Response Report.

October 2013 – November 2013 Tewkesbury Borough Plan public scoping consultation.

May 2013 - approval by Council of the Statement of Community Involvement (SCI).

April 2013 - approval by Council of the Local Development Scheme for Tewkesbury Borough.

Background Papers:

National Planning Policy Framework (February 2019) and National Planning Practice Guidance Adopted Joint Core Strategy (December 2017).

Tewkesbury Borough Local Plan (adopted 2006).

Local Development Scheme for Tewkesbury Borough (October 2017).

Tewkesbury Borough Council Statement of Community Involvement (May 2013).

The Tewkesbury Borough Plan Regulation 18 Scoping Summary Response Report (August 2014).

The Tewkesbury Borough Plan Regulation 18 Draft Policies and Site Options Summary Response Report (July 2015).

Tewkesbury Borough Plan Preferred Options Housing Background Paper - Approach to Sites (September 2018).

Tewkesbury Borough Plan Preferred Options Employment Sites Background Paper (September 2018).

Sustainability Appraisal (integrating Strategic Environmental Assessment; Health Impact Assessment; & Equality Impact Assessment) (August 2018).

Habitats Regulations Assessment (August 2018).

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Appendices: 1. Report of Borough Plan Working Group.

TEWKESBURY BOROUGH COUNCIL

Appendix 1

Report to:	Council
Date of Meeting:	30 July 2019
Subject:	Pre-Submission Tewkesbury Borough Plan
Report of:	Tewkesbury Borough Plan Working Group
Number of Appendices:	One

Executive Summary:

The Tewkesbury Borough Plan Working Group has been set up to feed into the development of the Tewkesbury Borough Plan (TBP); including receiving updates and information regarding its progress.

The Tewkesbury Borough Plan (TBP), as the Borough's second tier plan, is being prepared to complement the Joint Core Strategy (JCS) to provide a framework for development in Tewkesbury Borough to 2031.

This Member Working Group report seeks Council approval for the publication of the Pre-Submission version of the TBP under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 as the version to be submitted to the Secretary of State for independent examination.

Recommendation:

That Council

- 1. Approves the Tewkesbury Borough Plan Pre-Submission, set out in Appendix A, for publication under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 as the version of the Tewkesbury Borough Plan proposed to be submitted to the Secretary of State for independent examination;**
- 2. Delegates authority to the Head of Development Services, in consultation with the Lead Member for Built Environment, to make any necessary minor amendments prior to;**
 - i. publication of the Pre-Submission Tewkesbury Borough Plan; and**
 - ii. submission of the Tewkesbury Borough Plan for independent examination.**

Reasons for Recommendation:

To agree the Pre-Submission Tewkesbury Borough Plan for publication and submission to examination and enable the Council to progress the TBP to adoption to help meet our identified growth needs.

Resource Implications:

The preparation of the Pre-Submission Tewkesbury Borough Plan has already involved a significant amount of Officer resource from within the Planning Policy team as well as support from the wider Council.

Approval of the document for publication will involve Officer time in undertaking the consultation, organising and advertising the plan, attending consultation events, and analysing responses. The subsequent submission and examination of the plan will require further significant resource in terms of Officer time but also additional financial resource to meet the costs of undertaking the examination.

Legal Implications:

The Council is required to have an up to date local plan (development plan documents) for its area and must prepare it in accordance with legislative requirements, including ensuring the compliance with the Statement of Community Involvement, and must contain a reasoned justification for the policies contained in it.

The development plan for Tewkesbury Borough is made up of the development plan documents which have been adopted or approved in relation to its area and the neighbourhood development plans which have been made in relation to that area.

If to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted or made (as the case may be).

Legislation requires that where a development plan document contains a policy that is intended to supersede another policy in the adopted development plan, it must state that fact and identify the superseded policy.

Under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 before submitting a local plan to the Secretary of State for independent examination the Council must make a copy of all the proposed submission documents and a statement of representations procedure available via: their website; their principal office and such other places within their area as they consider appropriate; for a period of at least six weeks.

The proposed submission documents are to be the local plan which the Council proposes to submit to the Secretary of State; a submission policies map where the local plan if adopted would result in changes to the adopted policies map; a sustainability appraisal report of the local plan; a statement setting out the consultations already undertaken prior to the regulation 19 publication stage; a summary of the main issues raised by those representations and how those main issues have been addressed in the Pre-Submission local plan; and such supporting documents as in the opinion of the local planning authority are relevant to the preparation of the local plan.

The statement of representations procedure must include the date by which representations about the local plan must be received and the address to which representations about the local plan must be made (representations may be made in writing or by way of electronic communications).

In addition to the proposed submission documents, on submission for independent examination the Council must also send a statement setting out as regards the Regulation 19 Pre-Submission publication, the number of representations received in accordance with the representations procedure, copies of those representations and a summary of the main issues raised in those representations.

Risk Management Implications:

Failure to progress the Tewkesbury Borough Plan will have an adverse impact on the Borough's ability to provide sufficient sites for housing and employment growth to meet the requirements set out within the adopted Joint Core Strategy.

While the JCS sets out strategic policies, the Borough Plan is required to provide the locally specific policies and guidance that will help guide and determine proposals for new development in the area. Without these policies the Borough Council is in a weaker position in ensuring that new development is of a high quality, is sustainable and meets our objectives for growth in the Borough, in support of the rural area and in implementing the housing and economic objectives of the Council

The Borough Plan is also critical to identify the smaller-scale site allocations for housing and employment, particularly in the Borough's rural settlements. With regard to housing sites, this is vital to ensure that the Council can maintain a five-year supply of land. If the Council cannot demonstrate a five-year supply then its local plan policies may be considered out of date. This could result in a more unplanned approach to development, leading to inappropriate and incremental development being allowed on appeal that does not take account of requirements for supporting infrastructure, with the potential for adverse environmental impacts.

Performance Management Follow-up:

The Pre-Submission TBP will be published for public consultation and subsequently will be submitted to the Secretary of State for an independent examination. The Planning Inspectorate will appoint an Inspector to undertake this examination which will be publicly conducted and will involve public examination hearing sessions. As a result of the examination the Inspector may recommend main modifications be made to the plan in order to make it sound. Any proposed modifications will be brought back to the Council for approval and subject to further public consultation. Ultimately if the plan is found to be sound by an Inspector then the Council will be in a position to adopt the plan.

Environmental Implications:

The Tewkesbury Borough Plan must go through a sustainability appraisal process and Habitats Regulation Assessment (HRA) which consider the environmental, social and economic outputs of the Plan and ensures that development meets the needs of both present and future generations. The Sustainability Appraisal supporting the Pre-Submission TBP encompasses Strategic Environmental Assessment as required by EU Directive (2001/42/EC). In addition, the Habitats Regulations Assessment has been undertaken as required under the European Directive 92/43/EEC on the "conservation of natural habitats and wild fauna and flora for plans" that may have an impact on European (Natura 2000) Sites. The TBP also contains policies to protect and enhance the environment of the Borough.

1.0 INTRODUCTION/BACKGROUND

- 1.1 All local authorities are under a statutory obligation to prepare a development plan. Tewkesbury Borough Council has chosen to do this through the preparation of two key documents; the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) and the Tewkesbury Borough Plan (TBP). Together the two plans will provide the planning framework for the Borough until 2031.
- 1.2 The JCS was adopted in December 2017 and sets out the vision and objectives for the area together with strategic policies for shaping new development up to 2031. The JCS sets out the overall need for housing and employment growth in the area, the spatial strategy for meeting these needs, and allocates a number of larger strategic sites for development.

- 1.3 Whilst the JCS provides the higher-level strategic part of the development plan, more detailed, locally specific planning policies and smaller-scale site allocations are to be progressed through individual district-level (second tier) plans. For Tewkesbury this is the TBP. A key role for the TBP is to help to deliver the development requirements and growth and spatial strategy of the JCS, the TBP therefore needs to be consistent and in conformity with it.
- 1.4 The TBP has now been progressed to a Pre-Submission version of the plan produced for publication under Regulation 19 of the Town and County Planning (Local Planning) (England) Regulations 2012. The Pre-Submission plan is the version of the plan that the Council intends to submit to the secretary of state for independent examination. Prior to submission the plan is subject to a period for representations. The Member Working Group was set up in October 2017 and since its inception has been meeting to consider the issues raised in the preparation of the plan.

2.0 PREVIOUS STAGES OF THE TBP

- 2.1 The first stage of the TBP was an initial 'scoping' consultation that took place in October/November 2013. This scoping document posed questions on what the key planning issues are in the Borough, what the plan's vision should be and what the policies of the plan should cover.
- 2.2 Following the scoping stage, the Council consulted on a 'Draft policies and site options' TBP during February and March 2015. The Draft TBP presented a series of housing site options at the Rural Service Centres and Service Villages. In addition, the Draft TBP sought comment on a series of detail planning policies to help guide new development.
- 2.3 The JCS examination process took place from its submission in November 2014 until the authorities received the Inspector's Final Report in October 2017. During this time the uncertainty over the outcome of the examination meant that progress on the TBP had to be halted until the JCS was resolved so that any subsequent version of TBP fully reflected the final JCS plan. However, since adoption of the JCS in December 2017 work has continued on the TBP and a Preferred Options TBP was subject to public consultation during October and November 2018. The Preferred Options plan presented potential site allocations for housing and employment growth, proposed new settlement boundaries and retail designations. Alongside this, the Preferred Options plan presented a comprehensive suite of locally specific policy guidance to direct future development in the Borough. The consultation attracted over 1,100 individual comments submitted by over 430 separate responders. The responses to this consultation have been used to inform the development of the Pre-Submission plan.

3.0 DEVELOPMENT OF THE DRAFT PRE-SUBMISSION TBP – MEMBER WORKING GROUP

- 3.1 A Member Working Group was established for the development of the TBP and Officers and Members of the Group have been meeting since October 2017 to develop both the policies and the site allocations included in the Pre-Submission plan. This process has involved detailed discussions on the proposed policies, on their wording, implementation and likely outcomes, to ensure that they will deliver the Council's objectives for growth. Similarly, the site options for housing and employment development have been reviewed and assessed in detail with the working group, including site visits, to find the most appropriate options for inclusion in this Pre-Submission plan.

- 3.2 Alongside this, the Member Working Group recognises that the development of the plan has also involved cross-working amongst the Development Services team, including development management and communities and economic development teams. Specific input on the site assessment process has also come from the Council's Urban Design and Landscape Officers as well as liaison with County Council highways and education teams.
- 3.3 The draft of the Pre-Submission Plan recommended by the Working Group is attached at Appendix A.

4.0 PRE-SUBMISSION TBP – KEY TOPICS

- 4.1 The Pre-Submission TBP is split into a number of key topic areas under which a series of related planning policies and/or land allocations are presented. These topic areas are:
- Housing (including site allocations for Gypsies and Travellers).
 - Economy & Tourism.
 - Green Belt.
 - Town Centres & Retail.
 - Quality Places.
 - Natural Environment.
 - Communities, Health & Recreation.
 - Transport & Accessibility.

The JCS provides overarching policies which presents strategic guidance on all of these topic areas. However, the Borough Plan is to provide the more detailed and locally specific policies on these issues, adding to the existing JCS policy.

Housing (Allocations)

- 4.2 JCS Policy SP1: The Need for New Development sets out that there is a housing requirement of at least 9,899 new homes for Tewkesbury Borough. Policy SP2: Distribution of New Development provides the overall growth strategy for meet this requirement and sets the context for planning new development through the TBP. Policy SP2 states that:

To meet the needs of Tewkesbury Borough, none of which is being met by the urban extensions to Gloucester and Cheltenham, the JCS will make provision for at least 9,899 new homes. At least 7,445 dwellings will be provided through existing commitments, development at Tewkesbury town in line with its role as a market town, smaller-scale development meeting local needs at Rural Service Centres and Service Villages, and sites covered by any Memoranda of Agreement.

Rural service centres and service villages as identified in Table SP2c below will accommodate lower levels of development to be allocated through the Tewkesbury Borough Plan and Neighbourhood Plans, proportional to their size and function, and also reflecting their proximity and accessibility to Cheltenham and Gloucester and taking into account the environmental, economic and social impacts including existing levels of growth over the plan period.

Over the plan period to 2031:

- i. The rural service centres will accommodate in the order of 1860 new homes, and;*
- ii. The service villages will accommodate in the order of 880 new homes;*

The focus for the TBP with regard to site allocations, therefore, is the growth potential at Tewkesbury Town, Rural Service Centres and Service Villages.

- 4.3 In order to identify all reasonable sites which could come forward to meet the requirements of Policy SP2 all available land adjacent to Tewkesbury town, Rural Service Centres and Service Villages was initially considered and detailed assessments were undertaken to judge their potential suitability for development. Sites were judged against national and local policy constraints as well as key environmental factors. Each site was given a score (from A – D) based on the assessment, with those rated A and B considered to be potentially suitable for development. The proposed housing allocations at the rural service centres and service villages have then been determined by considering which sites are suitable and then by having regard to the JCS Policy SP2 requirement for allocations to be proportional to their size and function, and also reflecting their proximity and accessibility to Cheltenham and Gloucester and taking into account the environmental, economic and social impacts including existing levels of growth over the plan period. A similar process was followed for allocations at Tewkesbury town although with less emphasis on the proportionality of growth to the size and function of the settlement on the basis that Tewkesbury is the Borough's principal settlement. A detailed explanation of the assessment process is provided in the TBP Preferred Options Housing Background Paper (September 2018).
- 4.4 Policy RES1 Housing Site Allocations is the culmination of this site assessment process and presents those sites considered to be sustainable for housing development. They include a variety of different sites across the Borough's settlements which can contribute towards meeting our identified housing needs. For each site the site area is presented as well as the potential site capacity. Also accompanying the policy, are site specific development principles for the majority of the sites which set out the key considerations for any new development.
- 4.5 The site allocations proposed would provide up to 1,225 dwellings in total. It should however be noted that 81 of these dwellings are on sites that already benefit from planning permission. This leaves a remaining uncommitted supply (i.e. sites that don't already have planning permission) of 1,144 dwellings. Of these uncommitted sites, 200 dwellings would be located at the Rural Service Centres and 362 dwellings at the Service Villages. This would produce a total supply (plan period commitments plus proposed allocations) of 2046 new dwellings at the Rural Service Centres and 1153 new dwellings at the Service Villages. This amount of growth would exceed the minimum requirement of 1860 and 880 homes respectively for these locations through JCS Policy SP2. However, Member Working Group consider that providing for more than the minimum requirement will help maintain an adequate supply of housing. Further to this the proposed allocations would produce up to 300 (uncommitted) new dwellings at Tewkesbury Town, 272 new dwellings at Brockworth and 10 new dwellings at Forthampton. The plan also identifies a potential windfall housing opportunity at the MAFF site through Policy RET9 (Tewkesbury Town Regeneration). This would deliver approximately 40 additional dwellings at Tewkesbury town over and above the allocated supply identified in this plan. This additional supply will contribute to the Government's aim to boost the supply of housing and provide a sufficient, robust and flexible range of sites to ensure that the Borough can demonstrate a five-year housing land supply as required through the NPPF.
- 4.6 Settlement boundaries have also been updated for each of the Rural Service Centres and Service Villages (including the provision of new boundaries at Coombe Hill, Minsterworth, Norton, Stoke Orchard and Toddington) as well as at Tewkesbury Town and the 'Urban fringe settlements' adjacent to Cheltenham and Gloucester (e.g. Churchdown, Brockworth etc). The settlement boundaries are based on the existing ones identified in the Tewkesbury Borough Plan to 2011 and any respective Neighbourhood Plans, and expanded to include any new housing commitments and proposed site allocations where applicable.

Housing (Policy)

- 4.7 The TBP provides a series of policies to provide guidance on future housing development in the Borough. This includes the approach to development within and outside of identified settlement boundaries (Policy RES2, RES3) as well as more general guidance applicable to any new housing development (Policy RES5) including issues such as affordable housing (Policy RES12), housing mix (Policy RES13) and specialist accommodation for older people (Policy RES14). There are also detailed policies dealing with the reuse of rural buildings for residential development (Policy RES7), replacement dwellings (Policy RES9) and the extension of dwellings (Policy RES10).
- 4.8 Policy RES4 sets out an approach to housing at other rural settlements (those not identified within the settlement hierarchy, i.e. those without settlement boundaries) to allow for a more flexible approach to housing growth to in order to maintain the vitality of settlements within the rural area. Policy RES4 allows for very small-scale residential development within and adjacent to the built-up area of the settlement. However, this must be of a size and scale that is proportionate to the size and function of the settlement and complements its form, character and landscape setting.
- 4.9 Policy GTTS1 allocates three sites totalling a capacity of 30 pitches as sites on which occupation will be limited to Gypsies and Travellers. Under the JCS the total identified need for pitches for Tewkesbury Borough is 78 (made up of 5 travelling households, 25 non-travelling households and 48 not known). The allocations together with existing commitments totalling 20 pitches would cover the target for known travelling households and the majority of unknown households. As a proportion of the unknown households are likely not to be travelling household, the pitch target for travelling households in the JCS will be met.
- 4.10 In respect of Travelling Showpeople the JCS identified a need for Tewkesbury Borough of 24 plots (made up of 22 travelling households and 2 not known). Under policy GTTS1 one site with a capacity of 9 plots has been allocated on which occupation will be limited to Travelling Showpeople. No other suitable sites have been put forward and in order to meet the remaining target policy SD13 of the JCS will be used to assess future proposals.

Economy & Tourism

- 4.11 Policies EMP1 and EMP2 identify the Borough's Major Employment Sites and Rural Business Centres where there is general support for the principle of B-class employment development. The policy also allows for the expansion of these sites where appropriate.
- 4.12 Similar to the housing allocations through Policy RES1, a detailed site assessment process has been undertaken to look at the potential for new employment allocations and/or expansions of existing Major Employment Sites and Rural Business Centres. A detailed explanation of the assessment process is provided in the TBP Preferred Options Employment Sites Background Paper (September 2018). This has resulted in new sites being identified which would provide for a total of up 45ha of new employment land.
- 4.13 In addition to these identified and new employment sites, the Borough Plan provides policies for employment uses within existing settlement boundaries (Policy EMP3) and sets out the approach to development with the wider rural area (Policy EMP4). The plan also sets out general principles that should be considered for any new employment development proposal (EMP5).
- 4.14 Policies are provided that cover issues around agricultural development (Policies AGR1 to AGR4) and to cover tourism related development (Policies TOR1 to TOR5).

Green Belt

- 4.15 The interpretation of the Member Working Group is that the NPPF provides that, in order to meet its identified development needs, the LPA may remove areas from Green Belt designation in preparing the local plan. Therefore, in order to accommodate the allocation of new housing and employment land it has been proposed to remove land from the Green Belt in some locations. Policy GBR1 sets out where this Green Belt removal would occur. The Member Working Group consider that there are exceptional circumstances present (as required by the National Planning Policy Framework) to justify changes to the Green Belt to ensure that the Borough can meet its development needs in the most sustainable way.
- 4.16 Shurdington is the second largest service village in the Borough, is the joint highest ranking for its functionality, and highest ranking for accessibility. The Member Working Group considers that it has an identified housing need of 141 in the JCS plan period 2011-31, and is a sustainable location for growth. Due to existing Green Belt constraints, the actual housing delivery since 2011 has been just 7. Therefore, the Pre-Submission plan proposes to remove land from the Green Belt at Shurdington to provide for essential residential development. This includes land for three proposed site allocations, as well as the removal of existing areas of residential development, which the Member Working Group, having considered in detail the relative merits and consequences of removing a range of different sites, concluded delivers the most sustainable overall approach to providing for Shurdington's identified housing need. One such allocation is site (SHU4): Land south of Badgeworth Lane, which was included within the Preferred Options version of the plan. The Member Working Group considers that this site should be allocated as part of the overall proposal, as without it, Shurdington cannot achieve its identified housing need, and the Member Working Group considers that this constitutes exceptional circumstances as defined by the National Planning Policy Framework.
- 4.17 Removal of land from the Green Belt is proposed in the Staverton area to provide expansion land for the Major Employment Sites at Meteor Business Park, Ashville Business Park and Bamfurlong Industrial Park. An approach to development at Gloucestershire Airport is presented (Policy GRB2) which provides for a more flexible approach to airport related employment development within an identified 'non-essential operational area'. This maintains the airport within the Green Belt but provides an approach to help with the growth of this important employment area.
- 4.18 A particular policy area (Policy GRB3) has also been identified around the existing Bamfurlong Operational Policing site, which is within the Green Belt, to provide support for development that relates to proposals for the redevelopment and intensification of the site for operational policy and partnering uses.

Town Centres & Retail

- 4.19 Policy RET1 identifies the hierarchy of designated retail centres in the Borough, including Tewkesbury as the market town, Bishops Cleeve and Winchcombe as service centres, and 5 local centres. This policy sets out the general policy in regard to the development of main town centre uses in the centres. There is specific policy guidance for Tewkesbury town centre through Policy RET2 and for the other designated retail centres through Policy RET3. These policies are generally supportive of retail development but provide flexibility on the range of other town centre uses that may be considered acceptable to support their vitality and viability. Further policies deal with retail development in 'out of centre' locations (Policy RET4) and single or small groups of shops within residential areas (Policy RET5).
- 4.20 Policies that deal with specific types of retail uses are also provided, including on hot food takeaways (Policy RET6), public houses and local shops (Policy RET7) and agricultural/horticultural retail (Policy RET8).

- 4.21 A specific policy dealing with Tewkesbury Town regeneration programme is presented at Policy RET9. This policy also highlights the key regeneration sites of Healings Mill, the MAFF site and Spring Gardens.

Quality Places

- 4.22 This section of the TBP provides a suite of policies which seeks to ensure that new development is of a high quality and that enhances the built environment. Policy DES1 looks to adopt the Government's 'nationally described space standards' which provides a standardised approach to the size of dwellings (internal floorspace). Policy DES2 and DES3 deal with street furniture, signs advertisements while Policy DES4 specifically deals with the design of shopfronts.
- 4.23 A number of policies in the plan concern the protection and enhancement of the Borough's historic environment, including conservation areas (Policy HER1), Listed Buildings (Policy HER2) and locally important heritage assets (Policy HER5). There is also a specific policy dealing with the Tewkesbury 1471 battlefield (Policy HER6).

Natural Environment

- 4.24 Protection is given to the Borough's local landscape designations of the Special Landscape Areas (Policy LAN1) and the Landscape Protection Zones (Policy LAN2).
- 4.25 The TBP introduces a Strategic Gap policy (LAN3) which seeks to designate gaps between certain settlements in order to protect their separate identity, character, landscaping setting and prevent their coalescence. These strategic gaps are proposed for the areas between Bishop's Cleeve and Gotherington, Winchcombe and Greet, and Twynning and Church End.
- 4.26 The plan provides a policy for the protection of the Borough's biodiversity, geodiversity and important natural features (Policy NAT1), protection for the water environment (Policy NAT2) and seeks for new development to be designed to contribute and enhance the area's green infrastructure network (Policy NAT3).

Communities, Health & Recreation

- 4.27 Policy HEA1 looks for new development to promote healthy and active communities through their design and consider the impacts of development on health. Policies RCN1 and RCN2 deal with the provision of public outdoor space, sport pitches and sports facilities and the contribution that new development should make in providing them to meet the needs of communities. There is a specific policy provided on the protection of allotments and community gardens (Policy RCN3) and of community assets (Policy COM1), including shops, community centres, pubs, libraries etc.
- 4.28 Policy COM2 requires new residential and commercial development to be provided with the infrastructure necessary to enable access to high quality broadband, while Policy COM3 provides guidance for proposals for telecommunications development.

Transport & Accessibility

- 4.29 The TBP provides specific policies on pedestrian, cycle and public transport accessibility through Policies TRAC1 and TRAC2 and requires movement by foot, bike and bus to be fundamental considerations in the design on new major developments. A policy on parking provision for new development is present at Policy TRAC9.

- 4.30 Policy TRAC6 deals with the M5 Junction 9/A46 Corridor at Ashchurch to support the implementation of highway infrastructure improvements and states that new development along the corridor must not prejudice their delivery. In addition, a policy supporting the enhancement of the Ashchurch for Tewkesbury rail station is included (Policy TRAC5) which seeks to increase the frequency of train services and enhancements to the station facilities in line with the emerging rail strategy which is underway.

5.0 NEIGHBOURHOOD PLANNING

- 5.1 The Borough currently has six 'made' Neighbourhood Development Plans (NDP) and a number of others currently in progress. Where a NDP has been brought into force, the policies it contains, where they are in conflict, take precedence over the existing non-strategic policies in a local plan (such as the in the TBP) that cover that neighbourhood area. However, they may be superseded by strategic or non-strategic policies (in the JCS or TBP) that are adopted subsequent to the NDP.
- 5.2 The TBP has been developed to, where possible, reflect the policies and allocations of existing and emerging NDPs. Therefore, in the main, there should be no conflict issues for existing NDPs with contents of the TBP. However, where there are any conflicts, the TBP as the latest plan, would take precedence.

6.0 CONSULTATION & NEXT STEPS

- 6.1 If approved by the Council, the Pre-Submission TBP will be published for a minimum 6-week period for representations to be made. This will be undertaken in accordance with the Council's adopted Statement of Community Involvement. Dates and details are to be confirmed, but it is likely to take place between September and October 2019.
- 6.2 The publication and period for representations will be widely publicised, directly to those signed up the planning policy consultation database, but also via media/social media and through promotion to Town and Parish Councils.
- 6.3 Following the publication period, the plan will be formally submitted to the Secretary of State for its independent examination. This will include submission of the representations received to the Pre-Submission publication for the Inspector's consideration. This is expected to take place in November 2019.

Appendices: A - Pre-Submission Tewkesbury Borough Plan

**TEWKESBURY BOROUGH
PLAN
(2011-2031)**

PRE-SUBMISSION

JULY 2019

Contents

1. Executive Summary	4
2. Introduction	7
3. Housing.....	17
Policy RES1 Housing Site Allocations	20
Policy RES2 Settlement Boundaries	32
Policy RES3 New Housing Outside Settlement Boundaries.....	33
Policy RES4 New housing at other rural settlements.....	34
Policy RES5 New Housing Development	36
Policy RES6 Rural Exception Sites.....	37
Policy RES7 - Re-use of rural buildings for residential use	39
Policy RES8 Sub division of existing dwellings.....	40
Policy RES9 Replacement dwellings	41
Policy RES10 Alteration and extension of existing dwellings	43
Policy RES11 Change of use of agricultural land to domestic garden	45
Policy RES12 Affordable housing.....	45
Policy RES13 Housing Mix	47
Policy RES14 Specialist accommodation for older people	50
Policy GTTS1: Site allocations for Gypsies and Travellers	51
4. Economy and Tourism	55
Policy EMP1 Major Employment Sites	56
Policy EMP2 Rural Business Centres	58
Policy EMP3 Employment sites within settlement boundaries.....	59
Policy EMP4 Rural Employment Development	60
Policy EMP5 New Employment Development (General)	61
Policy EMP6 Safeguarding of Employment Sites.....	62
Policy AGR1 Agricultural Development.....	64
Policy AGR2 – Agricultural Diversification.....	65
Policy AGR3 – Agricultural and other rural workers dwellings	65
Policy AGR4 – Removal of occupancy conditions.....	67
Policy TOR1 - Tourism Related Development	68

Policy TOR2 Serviced/self catering accommodation.....	69
Policy TOR3 Caravan and camping sites.....	70
Policy TOR4 Herefordshire and Gloucestershire Canal Restoration	71
Policy TOR5 Gloucestershire Warwickshire Railway	72
5. Green Belt.....	73
Policy GRB1 – Green Belt Review	74
Policy GRB2 – Gloucestershire Airport.....	76
Policy GRB3 - Bamfurlong Operational Policing site	77
6. Town centres and retail	79
Policy RET1 Maintaining the vitality and viability of the town, borough and local centres.....	79
Policy RET2 Tewkesbury Town Centre and Primary Frontages.....	81
Policy RET3 Retail Centres.....	83
Policy RET4 Out of Centre Development.....	83
Policy RET5 Single or Small groups of shops in residential areas.....	84
Policy RET6 Hot Food Takeaways.....	85
Policy RET7 Local Shops and Public Houses	86
Policy RET8 Agricultural/Horticultural Retail in the countryside	87
Policy RET9 - Tewkesbury Town Regeneration	89
7. Quality Places.....	91
Policy DES1 Housing Space Standards.....	91
Policy DES2 Street Signage & Furniture	92
Policy DES3 Advertisements, Signs & Notice Boards	93
Policy DES4 Shopfronts	94
Policy HER1 Conservation Areas	94
Policy HER2 Listed Buildings.....	96
Policy HER3 Historic Parks and Gardens	97
Policy HER4 Archaeological Sites and Scheduled Monuments	97
Policy HER5 Locally Important Heritage Assets.....	98
Policy HER6 Tewkesbury (1471) Historic Battlefield	99
8. The Natural Environment.....	100
Policy LAN1 Special Landscape Areas.....	100
Policy LAN2 Landscape Protection Zone.....	101
Policy LAN3 Strategic Gaps.....	103

Policy LAN4 Locally Important Open Spaces	104
Policy LAN5 Local Green Spaces.....	105
Policy NAT1 Biodiversity, Geodiversity and Important Natural Features	106
Policy NAT2 The Water Environment.....	111
Policy NAT3 – Green Infrastructure: Building with Nature	112
Policy NAT4 – Tewkesbury Nature Reserve	113
Policy NAT5 – Cotswold Beechwoods	114
Policy ENV1 Development near sewage treatment works.....	115
Policy ENV2 Flood Risk and Water Management.....	116
Policy ENV3 Solar Farms.....	118
9. Communities, Health & Recreation	120
Policy HEA1 Healthy & Active Communities	120
Policy RCN1 Public Outdoor Space, Sports Pitch and Sports Facility Provision.....	122
Policy RCN2 New Sports and Recreational Facilities	123
Policy RCN3 Allotments & Community Gardens	125
Policy RCN4 Equine Facilities.....	126
Policy COM1 Protecting Community Assets.....	126
Policy COM2 Broadband Provision.....	128
Policy COM3 Telecommunications.....	129
Policy COM4 Neighbourhood Development Plans.....	129
10. Transport & Accessibility	131
Policy TRAC1 – Pedestrian Accessibility	131
Policy TRAC2 – Cycle Network & Infrastructure.....	132
Policy TRAC3 Bus Infrastructure.....	134
Policy TRAC4 High Frequency Bus Routes	136
Policy TRAC5 Ashchurch for Tewkesbury Rail Station.....	136
Policy TRAC6 M5 Junction 9/A46 Corridor	137
Policy TRAC7 Tewkesbury Northern Bypass Corridor	138
Policy TRAC8 Old Railway Line Tewkesbury	138
Policy TRAC9 Parking Provision	138

1. Executive Summary

- 1.1. Tewkesbury Borough Council is preparing a new plan that will guide where and how development will take place in our borough. It is called the Tewkesbury Borough Plan. It will provide an appropriate planning policy framework to ensure that Council policy on development is effectively implemented, that reasonable development aspirations for all are achieved, whilst giving essential protection for our communities and our built and natural environment against harmful development. It will be used to guide planning decisions and include land which will be developed for housing, employment and provide the necessary infrastructure to support this.
- 1.2. The new Tewkesbury Borough Plan will be a single document covering the whole of Tewkesbury Borough. It will set out the vision for the borough up to 2031, and provide a strategy for achieving it in line with the overarching direction provided by the Tewkesbury, Cheltenham and Gloucester Joint Core Strategy. It is a particularly important document if you live or work in Tewkesbury borough because it will be used to help guide local development issues up to 2031.

What is the Tewkesbury Borough Plan?

- 1.3. The Tewkesbury Borough Plan will form part of the statutory local development plan, referred to as the Local Plan. For Tewkesbury borough, the Local Plan also includes the Joint Core Strategy as well as any Neighbourhood Development Plans that have been prepared.
- 1.4. Whilst the Joint Core Strategy identifies larger sites for housing and employment, and deals with strategic issues such as Green Belt, flooding and transport, the Tewkesbury Borough Plan will identify the additional specific locations for smaller-scale growth and set out detailed policies for development and how we will protect our key assets, such as our valuable countryside, our historic heritage and our open spaces.
- 1.5. The Tewkesbury Borough Plan does not seek to cover strategic issues that are addressed by the Joint Core Strategy or any subsequent review of the Joint Core Strategy.

Why do we need a plan?

- 1.6. Policies need to be up to date to be useful in guiding planning decisions. The current adopted Tewkesbury Borough Local Plan covered the period 1991-2011. While many of these policies were 'saved' (i.e. they are still legally capable of being used in decision making until a new plan is adopted) they need to be replaced by a plan that takes into account changes in local and national circumstances.
- 1.7. Tewkesbury Borough Council wants to ensure that Tewkesbury borough has a development plan in place to guide decision taking in a planned manner.

Neighbourhood Development Plans

- 1.8. Neighbourhood Planning was first introduced in the Localism Act 2011 and Tewkesbury Borough Council has a duty to support communities in making their Neighbourhood Development Plan, commonly referred to as a Neighbourhood Plan.
- 1.9. At the time of writing Tewkesbury Borough has six Neighbourhood Development plans that have been 'made' (formally adopted), as well as a number of other parish and town councils who have registered a plan area and are at various stages of plan preparation. Where a Neighbourhood Plan is made by Tewkesbury Borough Council, the plan and its policies will become part of the Development Plan (together with the Borough Plan and Joint Core Strategy) and will be used to guide development and determine applications in the town or parish's designated neighbourhood planning area.

What happened to my feedback from the last consultation?

- 1.10. In October/November 2013 we consulted on the key issues affecting Tewkesbury borough. A wide range of issues were raised and can be seen in the 'Regulation 18 Scoping Summary Response Report' August 2014 report which is available on Tewkesbury Borough Council's website at <https://www.tewkesbury.gov.uk/emerging-planning-policies>. These responses were then used to help prepare the Draft Policies and Site Options Consultation Document.
- 1.11. Consultation on the Draft Policies and Site Options Consultation Document took place from February to April 2015 and the comments received can be seen in the Regulation 18 Summary Response Report (July 2015) which is available on Tewkesbury Borough Council's website at <https://www.tewkesbury.gov.uk/emerging-planning-policies>.
- 1.12. The Preferred Options plan was subject to public consultation between Wednesday 10th October and Friday 30th November 2018. The responses to this consultation have been used to prepare the Pre-Submission document. Copies of the responses received to the consultation including a summary of the comments made can be viewed on the website at: <https://www.tewkesbury.gov.uk/tewkesbury-borough-plan>

Pre-Submission: What happens next?

- 1.13. The 'Pre-Submission' version of the Borough Plan is the final stage of consultation before the plan is submitted to the Secretary of State for Communities and Local Government for its independent examination. Following submission, an appointed Planning Inspector will begin the examination of the plan and consider whether it is sound and legally compliant.
- 1.14. All representations received to this consultation will be submitted to the Secretary of State and considered as part of a public examination by the Planning Inspector. As such, responses to this consultation should focus on the soundness of the plan and its compliance with national policy and/or legislation.

How to respond

- 1.15. Tewkesbury Borough Council would like to invite you to comment on the Pre-Submission Tewkesbury Borough Plan consultation document for a period of XXXX weeks between XXXXXXXX and XXXXXXXX.
- 1.16. Copies of this document are available at locations across Tewkesbury borough including libraries, community/resource centres and in the reception area of Tewkesbury Borough Council offices. Specific public consultation events are also being held across the Tewkesbury borough area.
- 1.17. Comments on the Pre-Submission Tewkesbury Borough Plan are encouraged to be made online via the Tewkesbury Borough Council website at www.tewkesbury.gov.uk. Alternatively comments can be submitted by email to localplanconsultation@tewkesbury.gov.uk, or in writing to: Planning Policy, Tewkesbury Borough Council, Gloucester Road, Tewkesbury, Gloucestershire, GL20 5TT.
- 1.18. Representations submitted to the consultation will be considered by an independent Planning Inspector at a future examination of the plan. The role of the Planning Inspector will be to examine whether the plan is sound and complies with legal requirements. More information on the examination procedure has been produced by the Planning Inspectorate and can be viewed here: <https://www.gov.uk/government/publications/examining-local-plans-procedural-practice>
- 1.19. If you wish to make a representation seeking a change to the Plan or part of the document, you should explain why the document is not sound with regards to the legal compliance check. Where possible you should supply evidence to support your representation and make clear what changes need to be made to the plan as a result.
- 1.20. **Please be aware that your representation cannot be treated as confidential. As well as being sent to the Secretary of State, copies of all representations will be made available on the Council's website. Therefore, anyone will be able to view all representations made, attributable to your name and organisation (if applicable). Your contact details will be removed from copies of representations published electronically. If your representation is anonymous it cannot be taken into consideration.**

2. Introduction

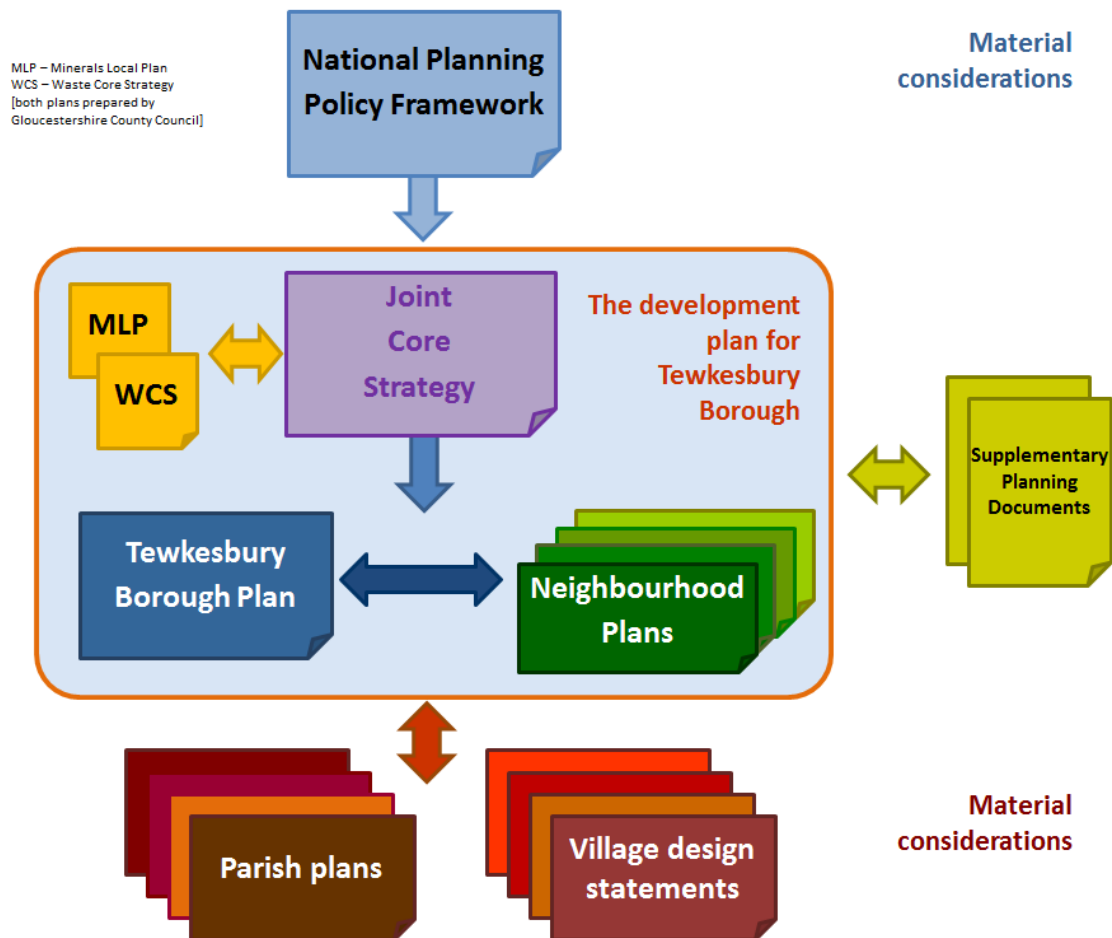
- 2.1. Tewkesbury Borough Council, as Local Planning Authority, has the key tasks of promoting and managing growth and development in the borough. The plan that we are preparing will provide a framework of planning policies specifically for Tewkesbury borough for the period to 2031. This new plan is called the ‘Tewkesbury Borough Plan’ and will form part of the statutory local development plan, usually referred to as the Local Plan, for our area together with the Joint Core Strategy which has been developed jointly by Gloucester City, Cheltenham Borough and Tewkesbury Borough Councils to provide strategic level guidance for all three areas working together.
- 2.2. It is forecast that over the next 14 years Tewkesbury borough will experience significant growth, alongside the growth that has already occurred, and while the Joint Core Strategy identifies where large strategic development will take place to accommodate some of this growth, it is the role of the Tewkesbury Borough Plan to identify where additional smaller-scale development should take place. In order to do this we need to decide the best way to accommodate the new housing and jobs necessary to meet our needs, while at the same time considering how to protect key assets – like our valuable countryside, our historic environment and our open spaces. This draft plan identifies preferred sites, known as ‘allocations’, to accommodate development and sets out policies to manage development and protect our key assets.
- 2.3. The following table sets out the current timetable for the preparation of the Tewkesbury Borough Plan.

Issues & Options ‘Scoping’ Consultation	Autumn 2013
Draft Policies and Site Options Consultation	Spring 2015
Preferred Options Consultation	Autumn 2018
Pre-Submission Consultation	Summer 2019
Submission for Examination	Autumn 2019

The Development Plan for Tewkesbury Borough

- 2.4. The development plan are the key documents through which Local Planning Authorities set out a vision and framework for the future development of their area, engaging with their communities in doing so. For Tewkesbury, the Local Plan comprises of several different documents which include the Joint Core Strategy, the Tewkesbury Borough Plan and any Neighbourhood Development Plans. However, it also includes the Waste Core Strategy and Minerals Local Plans prepared on a Gloucestershire-wide basis by Gloucestershire County Council.

- 2.5. In addition, all plans need to be prepared in line with the Government’s National Planning Policy Framework and Practice Guidance.



- 2.6. The Joint Core Strategy has been developed by Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council to provide strategic level guidance for all three areas working together. This document sits above the Tewkesbury Borough Plan and presents the overarching strategic plan for the area. The Joint Core Strategy was adopted by each Council in December 2017. As well as identifying where the larger ‘strategic allocation’ sites for development, it also deals with important issues such as Green Belt, flooding and transport. More details on the Joint Core strategy can be found on the website www.gct-jcs.org/

- 2.7. The administrative boundaries of Cheltenham and Gloucester are drawn fairly tightly around their built-up areas. There is consequently limited potential for these districts to find land within their administrative areas to accommodate the necessary housing growth. Consequently, part of that development will need to be accommodated outside of their administrative areas. The Joint Core Strategy allocates a number of urban extensions to Cheltenham borough and Gloucester city, within Tewkesbury Borough, which will contribute to meeting the unmet needs of these districts.

- 2.8. For Tewkesbury Borough, its housing growth is to be focused at Tewkesbury town as well as smaller-scale growth at identified Rural Service Centres and Service Villages. The Tewkesbury Borough Plan will guide this development and will sit ‘underneath’ the higher level Joint Core Strategy and will include locally specific policies and sites for:
- Housing in towns, villages and rural areas;
 - local employment, retailing and town centre boundaries;
 - places of local distinctiveness;
 - the countryside; and
 - those parts of the borough that will be subject to development restrictions,
- 2.9. The policies in the Borough Plan apply Borough-wide, including Strategic Allocation sites identified through the Joint Core Strategy.
- 2.10. The Joint Core Strategy identifies a housing shortfall for Tewkesbury Borough against its requirements. As such the Joint Core Strategy commits to an immediate review of Tewkesbury Borough’s housing land supply to meet this. This review is to be focussed around the Tewkesbury town/Ashchurch area as the primary opportunity area for strategic scale growth. It is not the role of the Tewkesbury Borough Plan to meet the shortfall identified by the Joint Core Strategy, this is the subject to an immediate review of that plan to deal with this at a strategic scale. However, it is recognised that the Borough Plan could contribute towards meeting some of this housing need.
- 2.11. The Borough Council have commissioned a consultant team to undertake masterplanning work for the Ashchurch area which will inform the immediate review and identify sites for further housing and employment growth. As this work is ongoing the Tewkesbury Borough Plan does not identify any allocations in the Ashchurch area so as to not prejudice the outcome of this masterplanning work.
- 2.12. Since 2011 there have been some significant changes to the planning system: The upper, ‘regional’, tier of plan making (called Regional Spatial Strategies) was abolished and a new ‘neighbourhood’ level of planning was introduced, which provides parish and town councils with the opportunity to prepare a legally binding ‘Neighbourhood Development Plan’, commonly referred to as a ‘Neighbourhood Plan’, for their area which, once in force, will form part of the (statutory) Development Plan.
- 2.13. Neighbourhood Planning was first introduced in the Localism Act 2011 as one of a number of Community Rights, which include Neighbourhood Development Plans, Neighbourhood Development Orders and Community Right to Build Orders. Tewkesbury Borough Council has a duty to: Support communities in making their Neighbourhood Plan; approve the designation of a Neighbourhood Planning Area, organising the independent examination of the Neighbourhood Plan, Development Order or Community Right to Build Order, which checks that the plan or order meets certain basic conditions; and organise a referendum of those living within the designated Neighbourhood Planning Area, which ensures that the local community has the final say on whether the plan or order comes into force in their area. Tewkesbury Borough Council will then

‘make’ a Neighbourhood Plan that has successfully been through examination and referendum. The Borough currently has five ‘made’ Neighbourhood Plans.

- 2.14. Where a Neighbourhood Plan is ‘made’ in Tewkesbury borough the provisions of that plan will become part of the Development Plan for the designated Neighbourhood Planning Area and will be used to guide development and determine planning applications in that area, insofar as they are relevant to the development being proposed.

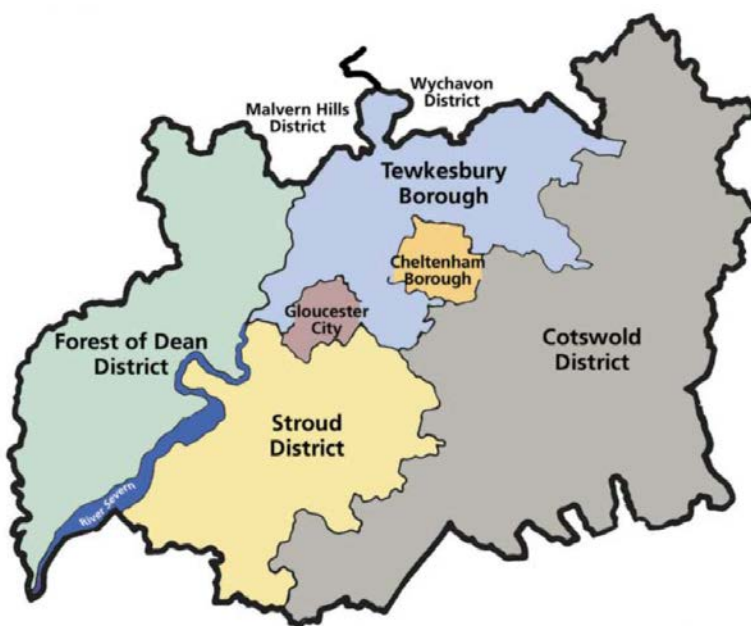
Why are we preparing a new plan?

- 2.15. Policies need to be up-to-date to be effective in guiding planning decisions. The currently adopted Tewkesbury Borough Local Plan covered the period 1991-2011. While most of these policies have been ‘saved’ (i.e. they are still legally capable of being used in decision making) they need to be replaced by a new plan that takes into account changes in local and national circumstances. Tewkesbury Borough Council therefore wants to ensure that the borough is covered by a development plan so that local planning decisions can be based on a locally considered plan rather than solely on the application of national policy on an application by application basis.
- 2.16. The Borough Plan also needs to allocate new sites for development around Tewkesbury town, Rural Service Centres and Service Villages to ensure that our growth requirements, as set out through the Joint Core Strategy, continue to be met.

What is Tewkesbury borough like?

- 2.17. This section outlines issues that are important for Tewkesbury borough and provides the background context for the policies presented in later sections of this plan.

Tewkesbury borough and adjacent areas



Population

- 2.18. Tewkesbury Borough is one of six districts in the county of Gloucestershire. It has 50 parishes covering an area of 160 square miles with a population of 86,900 (ONS, June 2015), which is an increase of around 14% since 2001. The borough has a predominately rural character with over 50% of people living in rural settlements and large market towns. The plan's base date is 2011, in that year there were 37,057 residential dwellings in the borough, which was an increase of 11% since 2001, by 2018 there were an additional 4,200 representing a further increase of around 11% bringing the total to 41,257. Compared with the rest of Gloucestershire Tewkesbury borough has a higher than average number of people aged 65 and over but fewer people under 18 and of working age. Approximately 2.5% of residents in the borough are from minority ethnic group backgrounds, which is lower than the countywide average of 4.6%.

Economy

- 2.19. The borough includes a wide range of economic activity, ranging from large multinationals to micro businesses. In terms of employment, manufacturing accounts for a quarter of all jobs. The other significant sectors are: distribution, hotels and restaurants, finance, IT and other business services and public administration, education and health. The tourism sector is also increasingly important, particularly for the rural economy.
- 2.20. The economically active rate in the borough is 81.7%, compared to regional (81.4%) and national rates (78.4%) (ONS Annual Population Survey Jan 2017- Dec 2017). The unemployment rate at May 2018 was 1.1% (ONS).

Environment

- 2.21. Tewkesbury borough has a diverse landscape from the largely flat central Severn Vale to the wooded slopes bordering the Cotswolds. Although largely rural in character, with market towns, villages and agricultural land uses, there are significant areas of urban fringe around Cheltenham and Gloucester. Landscape is therefore not simply an issue associated with the rural areas where landform, woodland, mature trees, hedgerows, fields and other features contribute to the overall character, but also within urban areas and villages where at a smaller scale, landscape features such as parks, open areas, and street trees can be equally important. Approximately 36% of the borough's landscape is recognised as being of national importance and is designated as part of the Cotswold Area of Outstanding Natural Beauty (AONB).
- 2.22. Tewkesbury borough contains a number of nationally important nature sites including: the Cotswold Beechwoods; former Cotswold quarries of geological interest; and areas supporting rare plant species and wildlife. This includes 20 Sites of Special Scientific Interest (SSSI), two of which have also been recognised as Special Areas of Conservation (SAC) under the Natura 2000 Convention.

Shopping, heritage and tourism

- 2.23. The historic market towns of Tewkesbury and Winchcombe are popular tourist destinations and offer many shopping opportunities. Elsewhere, the main retail centres are those of Bishop's Cleeve, Brockworth and Churchdown. In addition there are numerous small local shopping areas and village shops, as well as other facilities such as garden centres, farm shops and shops attached to petrol stations.
- 2.24. The borough contains many historic buildings and sites including the historic market towns of Tewkesbury and Winchcombe. There are over 1,800 listed buildings, 14 conservation areas, 54 scheduled monuments and the registered site of the 1471 battle of Tewkesbury as well as many thousands of undesigned heritage assets, both buildings and archaeological sites, many of which are of equivalent significance to designated heritage sites.

Flooding

- 2.25. Flooding is a significant issue in the borough, both from rivers and watercourses overflowing their banks and also from surface water collecting following heavy rainfall. The Environment Agency's (2012) Flood Map estimates that around 13% of land in Tewkesbury borough has a one in 100 (or greater) risk of flooding each year. This is predominantly, although not exclusively, in the western area of the borough, which comprises the Severn and Avon rivers as well as a large number of smaller watercourses.

Transport

- 2.26. Transport networks in Tewkesbury borough face increased pressure from new developments, demographic changes, such as an ageing population, and the general growth in travel and traffic. If left un-addressed this could hamper economic growth, lead to an increase in carbon emissions and harm the enjoyment and quality of life of those living, working and visiting the borough.
- 2.27. The M5 motorway, which passes through the borough from north to south is a dominant feature of the strategic highway network and access to and from the four junctions within the borough can have knock on effect for other adjoining strategic routes, such as: The A46 from junction 9 to Aston Cross; the A4019 from junction 10 to Cheltenham and the A38; the A40 from junction 11 to Cheltenham and Gloucester; and the A417 from junction 11a at Brockworth to Gloucester and Birdlip.
- 2.28. The Local Transport Plan for Gloucestershire recognises that "providing public transport in rural areas" such as Tewkesbury borough "is expensive and it is difficult to serve dispersed communities with conventional public transport services" and this is experienced in the borough with regular services between: Tewkesbury, Cheltenham and Gloucester; Cheltenham and Bishops Cleeve, Gotherington, Gretton, Southam and Winchcombe; and Gloucester and Churchdown, Brockworth and Cheltenham but there are fewer and less regular services to many of the more rural

settlements within the borough. This is of particular concern as the impact of an ageing population generally increases the demand for public transport provision.

- 2.29. Tewkesbury itself is recognised in the Local Transport Plan as having a reasonable network of on and off road cycle routes and a number of routes of the National Cycle Network pass through the borough.
- 2.30. Within the borough, Ashchurch for Tewkesbury Rail Station serves the Northway and Tewkesbury areas and beyond, and is served by trains to and from Birmingham, Worcester, Gloucester, Bristol and Cardiff though frequency is an issue that is raised later in the Tewkesbury Borough Plan.
- 2.31. The borough also has areas of high heavy goods vehicle activity, which can cause problems on specific routes, for example: To and from the M5 motorway at junction 9 from Ashchurch Industrial Estate, Northway Trading Estate, Tewkesbury Business Park and Newtown Industrial Estate.

A vision for our borough

- 2.32. The first step in shaping Tewkesbury Borough Plan's content is to set out our aspirations (or 'vision') for the future. We then need a clear set of short statements (or 'objectives') that provide the means of getting us to our desired end result.

Creating the vision and objectives

- 2.33. The plan aims to be aspirational but it also needs to be realistic. The National Planning Policy Framework requires a positive approach be taken in line with the requirements of sustainable development, which is based on three dimensions: environmental, economic and social. Additionally, the plan can only include policies that provide a clear indication of how a decision maker should react to a development proposal. When framing a vision for our borough we need to be mindful of these requirements.
- 2.34. There was a suggestion, during the scoping stage consultation, that we should keep the vision simple and locally focussed. As a result, rather than setting out a statement that presents a long wish list of issues to address, we have focussed on what we want the borough to be like by 2031. The vision statement therefore focusses on the positive aspects of the borough and a sub-paragraph identifies location specific objectives and other important factors. The vision is:

“Tewkesbury borough, a place where a good quality of life is open to all, where our environment and heritage assets are cherished, a sufficient supply of homes is available and where a thriving economy supports healthy and happy communities.”

This will be achieved by ensuring that development is directed away from land at risk of flooding and high quality landscapes/heritage assets and towards locations where the mix of land uses and proximity to existing facilities minimises travel distances and maximises transport choice.

- 2.35. The vision statement incorporates the three dimensions of sustainable development as a whole through its use of the phrase ‘good quality of life open to all’, which can be broken down into:

*The terms ‘**environment** and heritage assets’ encompass factors such as the countryside, high quality landscapes, wildlife habitats, climate change, rivers and also include things such as listed buildings, conservation areas, scheduled monuments, registered battlefields and historic parks and gardens.*

*‘Thriving **economy**’ relates to industry/business, retail shopping, tourist activities and employment.*

*‘Healthy and happy communities’ includes **social** interests such as health (physical and mental), homes, recreation, cultural and religious needs.*

- 2.36. We realise that certain specific issues are not explicitly mentioned in the vision statement, such as the provision of infrastructure, retailing, tourism, flooding, and education. Instead, the plan details these within the objectives for delivering the vision are the place where these matters will be addressed.

Objectives and key principles

- 2.37. A set of objectives have been developed that will enable us to meet the vision. These have been used to create policies and to help allocate land that will turn the vision into reality. The objectives below are based on those set out in the Joint Core Strategy, and takes into account the previous Tewkesbury Borough Local Plan to 2011, updated to reflect comments from the Regulation 18 consultations. All of the objectives contribute to improving the quality of life for all and achieving sustainable growth and development. The notion of a ‘connected borough’ is referenced in relation to objective three but could be applied across multiple objectives.

- 2.38. The objectives for the Tewkesbury Borough Plan relate to the following issues:

1. To implement the housing and economic development intentions of the Joint Core Strategy and Tewkesbury Borough Council Plan, and ensure a sufficient and wide choice of quality homes are available for all who choose to live in the Borough (including market housing, affordable housing, housing for elderly, sheltered and specialist accommodation and Gypsy and Traveller community pitches/sites). This criterion incorporates flexibility in terms of the ‘choice’ it seeks to provide and also includes provision of the necessary infrastructure;
2. To facilitate the reasonable development aspirations of residents and businesses in the borough, including providing opportunities for small and medium sized builders and those wishing to build their own homes, and supporting appropriate windfall sites through policies and decisions, whilst ensuring essential protection against harmful development;

3. Promoting sustainable transport (including public transport, cycling, walking, issues around freight transport and use of the private motor vehicle). This also includes the provision of infrastructure and issues of connectivity within and between modes of transport;
4. Promoting healthy connected communities (including recreation, culture and religious needs [and closely linked to active modes of transport]). This also includes the provision of infrastructure;
5. Supporting a prosperous and competitive urban and rural economy (including employment and businesses in both existing settlements and rural areas). This also includes the provision of infrastructure;
6. Sustaining rural settlements and enhancing the vitality of rural communities, recognising that housing is essential to ensure the retention and development of local services and community facilities;
7. Conserving and enhancing the built and natural environment (including heritage assets, urban and architectural design, landscapes and biodiversity), steering development away from the most sensitive areas and towards those identified as being suitable for growth, making the most effective use of land by giving priority to brownfield sites where available and appropriate, maintaining and enhancing networks of habitats and green infrastructure; and
8. Meeting the challenges of climate change and resource conservation (including managing flood risk, energy efficiency, renewable energy and waste minimisation).

The National Planning Policy Framework

2.39. Each of the ‘themes’ set out in the National Planning Policy Framework will need to be covered in the plan. We also need to consider if there are any matters that are not covered here that should be included as well. The National Planning Policy Framework covers the following ‘themes’:

- Delivering a sufficient supply of homes
- Building a strong, competitive economy.
- Ensuring the vitality of town centres.
- Promoting healthy and safe communities.
- Promoting sustainable transport.
- Supporting high quality communications
- Making effective use of land
- Achieving well-designed places.
- Protecting Green Belt land.
- Meeting the challenge of climate change, flooding and coastal change.
- Conserving and enhancing the natural environment.
- Conserving and enhancing the historic environment.
- Facilitating the sustainable use of minerals

Assessing and delivering the plan

2.40. The plan must be assessed using a range of methods, including:

- Sustainability Appraisal (to ensure the plan's policies and proposals are in line with economic, social and environmental objectives);
- Habitats Regulation Assessment (for particularly important designated wildlife habitats);
- Strategic flood risk assessment (to ensure that proposed development will not increase flood risk on its own or cumulatively with existing development either on the site or elsewhere);
- Heritage assets (to consider the protection and conservation of buildings, their settings and wider areas) Audit;
- Landscape Assessment;
- Biodiversity Assessment;
- Viability (economic delivery) Appraisal; and
- Examination in Public (by an independent planning inspector).

Monitoring and appraisal

2.41. Our objectives will need to be specific and measurable so that we can monitor our progress towards achieving them. Consequently, specific criteria will need to be attributed to each objective. These will be developed as the plan progresses and will be linked to the sustainability appraisal work.

We will assess the plan using the following tools:

- Sustainability appraisal.
- Appropriate assessment (habitats).
- Historic and natural environment (assets, buildings, landscape, biodiversity, flooding).
- Viability, including infrastructure provision.
- Public examination by an independent planning inspector.

3. Housing

Introduction

- 3.1. The National Planning Policy Framework (NPPF) supported by National Planning Practice Guidance (PPG) sets out the Government's planning policies for England and how they are expected to be applied. The National Planning Policy Framework requires us, as Local Planning Authority, to assess the need for housing in our area, plan to meet that need and identify a supply of land to meet that need over 5, 10 and 15 year periods.
- 3.2. The Joint Core Strategy (JCS) sets out the over-arching strategy for growth throughout Cheltenham, Gloucester and Tewkesbury up until 2031. It has identified the objectively assessed need for Tewkesbury borough and the spatial strategy to accommodate that level of development. The JCS identifies key locations for growth and sets out strategic policies to guide future development.
- 3.3. The JCS identifies a settlement hierarchy as the basis for the strategy for delivering growth targets, derived from the objectively assessed need for housing, in the most sustainable manner possible. The JCS settlement hierarchy for Tewkesbury Borough includes Tewkesbury Town as the top tiered settlement followed by the two Rural Service Centres and then the 12 Service Villages. The Rural Service Centre and Service Village classification was informed by the JCS Settlement Audit (2017). These are the locations at which housing land allocations will be made through the Tewkesbury Borough Plan.
- 3.4. Further to the planned growth at Tewkesbury town, the Rural Service Centres and Service Villages, the Council also recognises that some opportunities for small scale new housing will be necessary in order to support the vitality of communities at other rural settlements across the Borough, in accordance with the NPPF, and meet individual development aspirations. Housing supply and affordability can often be a problem in the rural areas to the extent where new generations are forced to move away from the communities in which they grew up and have family ties. This can cause communities to stagnate. Furthermore, the PPG recognises that a thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. The closure of essential services and facilities in the rural areas is becoming a problem within Tewkesbury Borough and the Council recognises that some rural housing is essential to ensure

their viability. As such, the NPPF states that planning policies should identify opportunities for villages to grow and thrive to support local services and recognises that where there are groups of smaller settlements, development in one village may support the services in a village nearby. At the same time however it is essential that the levels of rural housing growth are manageable and sustainable in order to protect existing communities and the rural landscape and avoid harmful over development.

3.5. To achieve these objectives this plan sets out the Council’s preferred policy approach for enabling appropriate small scale housing development at those settlements not defined within the settlement hierarchy. A specific site allocation is also made at Forthampton to meet community aspirations to enable a small amount of new housing within the settlement to support its vitality.

3.6. The following list sets out the settlement hierarchy for Tewkesbury Borough.

Settlement tier	Settlements
Market town	Tewkesbury town area ¹
Rural Service Centres	Bishop’s Cleeve Winchcombe
Service Villages	Alderton Coombe Hill Gotherington Highnam Maisemore Minsterworth Norton Shurdington Stoke Orchard Toddington (inc. New Town) Twyning Woodmancote

¹ The Tewkesbury Town area is defined as the wider built up area of Tewkesbury including Wheatpieces, Newtown, Northway and Ashchurch

3.7. In addition to the settlement hierarchy there are a number of settlements within the Borough that are closely associated with Gloucester or Cheltenham. These settlements do not fit into the Borough’s settlement hierarchy as in strategic planning terms they are considered to form part of the urban fringe of Gloucester and Cheltenham. They do however represent sustainable settlements possessing a good range of services and good accessibility to Gloucester and Cheltenham. A settlement boundary is defined for these urban fringe settlements but the plan does not propose to allocate land for housing development further to the Strategic Allocations within the Joint Core Strategy.

Urban fringe settlements	
Gloucester	Brockworth Churchdown Hucclecote Innsworth Longford
Cheltenham	Uckington

3.8. The housing policies within the Tewkesbury Borough Plan aim to respond to these identified issues where appropriate to do so.

Policy Framework

3.9. The NPPF states that, to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

3.10. The Joint Core Strategy provides strategic level guidance for Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council. Policy SA1 identifies where the larger housing and employment development will be and Policy SD10 directs development according to the settlement hierarchy established in Policy SP2. Policy SD11 covers the mix of housing, space and accessibility standards and requirements of specialist accommodation and Policy SD12 sets

requirements for Affordable Housing expected of developers. Policy SP1 establishes the objectively assessed need for development, in this case housing and Policy SP2 Identifies the settlement hierarchy that puts the Key Urban Areas of Cheltenham and Gloucester at the top, the Market Town of Tewkesbury next and then ‘Rural Service Centres’ and ‘Service Villages’ respectively. In addition the following policies will be applied:

Policy RES1 Housing Site Allocations

The sites listed in Table 1 are allocated for residential and mixed use development. The boundaries of each allocation are shown on the proposals map. A number of allocations are supported by site-specific policies below to provide further detailed guidance on the development of these sites (not all allocations are subject to site specific policies). These site-specific policies also form part of this policy. In all cases development must comply with the relevant criteria set out at Policy RES5 in addition to the site specific requirements.

Table 1 – Housing Site Allocations

<u>Site</u>	<u>Location</u>	<u>Site area</u>	<u>Indicative capacity</u>	<u>Site specific policy</u>
TEW1	Land at Odessa Farm, Tewkesbury	10ha	100 dwellings	Yes
TEW2	Land adjacent to John Moore Primary School, Wheatpieces, Tewkesbury	0.9ha	30 dwellings	No
TEW3	Spring Gardens, Tewkesbury	1.3ha	30-100 dwellings	Yes
TEW4	Healings Mill, Tewkesbury	1.5ha	100 dwellings	Yes
BIS1	Land adjacent Breaker’s Yard, Bishops Cleeve	1.4ha	26 dwellings	No
BIS2	Land at Homelands Farm, Bishops Cleeve	2.2ha	35 dwellings	Yes
BIS3	Land at allotments off A435, Bishops Cleeve	3.9ha	85 dwellings	Yes

<u>WIN1</u>	Land off Delavale Road/Orchard Road, Winchcombe	<u>6.2ha</u>	<u>80 dwellings</u>	<u>Yes</u>
<u>COO1</u>	Land at junction of A38/A4019, Coombe Hill	<u>4.9ha</u>	<u>50 dwellings</u>	<u>Yes</u>
<u>COO2</u>	Land adjacent to the Swan PH	<u>0.9ha</u>	<u>26 dwellings</u>	<u>No</u>
<u>GOT1</u>	Land to the north of Malleson Road, Gotherington (GNDP 2/1)	<u>0.86ha</u>	<u>6 dwellings</u>	<u>No</u>
<u>GOT2</u>	Land to the north of Gretton Road, Gotherington (GNDP 2/3)	<u>1.25ha</u>	<u>10 dwellings</u>	<u>No</u>
<u>MAI1</u>	Land at Bell House Farm, Maisemore	<u>0.7ha</u>	<u>15 dwellings</u>	<u>No</u>
<u>SHU1</u>	Land at corner of Badgeworth Lane and A46, Shurdington	<u>2.2ha</u>	<u>50 dwellings</u>	<u>Yes</u>
<u>SHU2</u>	Land north of Leckhampton Lane, Shurdington	<u>1.2ha</u>	<u>20 dwellings</u>	<u>Yes</u>
<u>SHU3</u>	Garage site at Harrison Road, Shurdington	<u>0.57ha</u>	<u>15 dwellings</u>	<u>Yes</u>
<u>SHU4</u>	Land to south of Badgeworth Lane, Shurdington	<u>6.7ha</u>	<u>110 dwellings</u>	<u>Yes</u>
<u>TOD1</u>	Land adjacent to Pheasant Public House, Toddington	<u>1.6ha</u>	<u>25 dwellings</u>	<u>Yes</u>
<u>WOO1</u>	Land adjacent Oxbutts Caravan park, Woodmancote	<u>2.3ha</u>	<u>60 dwellings</u>	<u>Yes</u>
<u>BRO1</u>	<u>Land Adjacent To Hucclecote Road And Golf Club Lane, Brockworth</u>	<u>3.33ha</u>	<u>166 dwellings</u>	<u>No</u>

<u>BRO2</u>	<u>Nerva Meadows,</u> <u>Gloucester Business Park,</u> <u>Brockworth</u>	<u>3.3ha</u>	<u>106 dwellings</u>	<u>No</u>
<u>FOR1</u>	<u>Land at corner of Bishops</u> <u>Walk and School Lane,</u> <u>Forthampton</u>	<u>1.55ha</u>	<u>10 dwellings</u>	<u>Yes</u>

Notes

**All site capacities are an approximate. Detailed design proposals may indicate that greater or fewer dwellings can be accommodated on a site. Appropriate site capacities have been determined as part of the site assessment process set out at the Tewkesbury Borough Plan Housing Background Paper. Capacities for sites already benefiting from planning permission are based on the permitted scheme. Capacities for sites allocated within a Neighbourhood Plan are based on the allocated number of dwellings.*

Policy TEW1 - Land at Odessa Farm, Tewkesbury

Proposals on this site will be expected to address the following requirements:

- All built development should be located to the north and north-west of the site in order to limit intrusion into open countryside.
- Public open space should be provided to the south of the site; in order to provide a transition between built development and open countryside; and to the east of the site in order to avoid development in Flood Zones 2 and 3 and the part of the site in the Registered Battlefield and Conservation Area. All built development must be located in Flood Zone 1.
- The proposal should respond to the landscape setting. Development should front open space. The edge of the development should be loose and incorporate open space in order to aid the transition between countryside and built development.
- The proposal should incorporate connected green infrastructure. Opportunities to provide a green infrastructure connection with Tewkesbury Nature Reserve should be explored and implemented
- Biodiversity net gain should be delivered in accordance with Policy NAT1; the focus of which may be through wetland habitat creation, the restoration/enhancement of the Priority Habitat on site (Coastal and Floodplain Grazing Marsh) and habitat connectivity with Tewkesbury Nature Reserve

- Opportunities to deliver flood alleviation measures on site should be explored and implemented with the aim of reducing the risk of flooding from the River Swilgate further downstream
- The proposal should address the site specific FRA requirements set out within the Level 2 Strategic Flood Risk Assessment (November 2017)
- The proposal should provide safe, easy and convenient pedestrian and cycle links within the site and to nearby bus stops and the services and facilities within the wider town

Policy TEW3- Spring Gardens, Tewkesbury

This site is allocated for between approximately 30 to 100 dwellings as part of a mixed use redevelopment including complementary uses that add to the life and vitality of the town centre - retail and leisure, cafes, restaurants and employment uses would all be appropriate. Public space may also be provided for markets and other events.

Proposals will be expected to be in conformity with the relevant development principles and parameters set out in the Tewkesbury Town Regeneration Supplementary Planning Document. In addition, proposals should:

- Contribute to the wider green infrastructure network and the delivery of the JCS Green Infrastructure Strategy (June 2014)
- Deliver a biodiversity net gain, including by improving habitat connectivity and acting as a stepping stone between the nearby Key Wildlife Site (Tewkesbury Disused Railway Line) and the Severn Ham Site of Special Scientific Interest
- Employ creative SuDS solutions and explore and implement opportunities to improve runoff rates and reduce the risk of flooding. A minimum discharge reduction of 40% will be expected.
- Address the site's location within an Air Quality Management Area by including measures to improve air quality and providing any necessary measures to mitigate air quality impacts on new residents

Policy TEW4 - Healings Mill, Tewkesbury

This site is allocated for approximately 100 dwellings as part of a mixed use development. Other suitable uses may include retail and leisure, cafes, restaurants, employment uses, tourist related development, community and recreational uses.

Proposals will be expected to be in conformity with the relevant development principles and parameters set out in the Tewkesbury Town Regeneration Supplementary Planning Document. In addition, proposals should:

- prioritise the conservation of the heritage assets on site as part of the redevelopment
- pass the flood risk 'exception test' (as set out in the National Planning Policy Framework) in relation to the parts of the development involving more vulnerable uses (including residential)
- contribute to the wider green infrastructure network and the delivery of the JCS Green Infrastructure Strategy (June 2014)
- deliver a biodiversity net gain, which may include the expansion/restoration of the habitats associated with the Severn Ham SSSI

Policy BIS2 - Land at Homelands Farm, Bishops Cleeve

Proposals on this site will be expected to address the following requirements:

- Development should be well integrated with the adjacent housing development to the south and west
- A landscaped green edge should be provided to the north of the site corresponding to, and providing visual and functional connectivity with, the green infrastructure in the adjacent development (Homelands 2) and providing biodiversity net gains
- Vehicular access should be from the adjacent development to the south unless demonstrated not to be feasible
- Pedestrian and cycle connectivity with Gotherington Lane and the adjacent development to the south and east should be achieved

Policy BIS3 – Land at allotments off A435, Bishops Cleeve

Proposals on this site will be expected to address the following requirements:

- It must be demonstrated that sufficient alternative allotment provision has been provided elsewhere in the locality, and that any remaining tenanted plots on the site will be suitably replaced in accordance with Policy RCN3.
- All built development must be located in Flood Zone 1
- A landscaped green edge should be provided to the north of the site corresponding to, and providing visual and functional connectivity with, the green infrastructure in the adjacent development to the west (Cleevelands) and providing biodiversity net gains

- Vehicle access should be from the adjacent development to the south/west (Cleavelands) unless demonstrated not to be feasible
- Pedestrian and cycle connectivity with the adjacent development to the south/west (Cleavelands) should be provided

Policy WIN1 - Land off Delavale Road/Orchard Road, Winchcombe

Proposals on this site will be expected to address the following requirements:

- The development should be landscape led. Suitable developable areas on site must be informed by a Landscape and Visual Impact Assessment. Development on prominent slopes should be avoided and, in all cases, built development, supporting infrastructure, open space and community facilities should be located below the 115 metre contour line as identified in the Winchcombe Town Landscape and Visual Sensitivity Study (Toby Jones Associates, November 2014). The development should provide a low density loose edge which incorporates open space and landscaping to aid the transition between countryside and built development. Development should front open space in order to achieve a positive relationship between the town and the surrounding landscape
- The proposal should contribute to the wider green infrastructure network and deliver biodiversity net gains
- The proposal should promote accessibility to local services and public transport by pedestrians and cyclists by ensuring permeability through the site and connectivity with adjacent streets
- Proposals on these sites should address the site specific FRA requirements set out within the Level 2 Strategic Flood Risk Assessment (November 2017) and its Addendum (2018).

Policy COO1 - Land at junction of A38/A4019, Coombe Hill

The development of this site presents a place making opportunity. The Council will expect:

- the proposal to provide well designed, active frontages along the A38 and A4019 so to enliven the street scene and create a sense of place
- accessible public open space to be provided on site for use by the wider community
- enhanced pedestrian connectivity to be provided with Site RES1K (Land at Swan PH) and the services and public transport facilities within the village

- the proposal to contribute to the wider green infrastructure network, deliver biodiversity net gains and mitigate against increased recreational pressures on the Coombe Hill Canal Site of Special Scientific Interest
- the opportunity for a landmark feature on the prominent corner location at junction of A38 and A4019 to be explored and implemented
- the density of development to be relatively low, and the layout to be landscape led, so to respect the rural nature of the location and aid assimilation within the wider landscape
- the design and layout of development to address the relationship between the proposed dwellings and the adjacent petrol station and car wash facility, so to avoid adverse amenity impacts on future occupiers

Policy SHU1 - Land at corner of Badgeworth Lane and A46, Shurdington

Proposals on this site will be expected to address the following requirements:

- As part of any access proposals from Badgeworth Lane, parking arrangements must be provided for Shurdington Primary School to ensure adequate and safe two-way traffic movements along Badgeworth Lane, particularly during school drop off/pick up times. Proposals must consider the provision of new school parking spaces on the site as an integral part of the development in the first instance
- The site should be planned together with Site SHU4 to form a cohesive development. Proposals must explore and implement opportunities for a vehicular and pedestrian access route to be provided between the two sites and connecting any separate access points to Badgeworth Lane
- The proposal should contribute to the wider green infrastructure network, deliver biodiversity net gains and mitigate against increased recreational pressures on the Cotswold Beechwoods Special Area of Conservation
- The development should incorporate the suggested mitigation within the Tewkesbury Borough Plan – Assessment of Site Allocation Impacts on the Cotswold AONB (Toby Jones Associates, May 2019)
- The proposal should address the relevant site specific Green Belt mitigation guidelines set out at Appendix 1 of the Part 2 (Partial) Green Belt Review (LUC, July 2017)

Policy SHU2 – Land north of Leckhampton Lane, Shurdington

Proposals on this site will be expected to address the following requirements:

- The proposal should contribute to the wider green infrastructure network, deliver biodiversity net gains and mitigate against increased recreational pressures on the Cotswold Beechwoods Special Area of Conservation
- The development should incorporate the suggested mitigation within the Tewkesbury Borough Plan – Assessment of Site Allocation Impacts on the Cotswold AONB (Toby Jones Associates, May 2019)
- The proposal should address the relevant site specific Green Belt mitigation guidelines set out at Appendix 1 of the Part 2 (Partial) Green Belt Review (LUC, July 2017)

Policy SHU3 - Garage site at Harrison Road, Shurdington

Development on this site should be for 100% affordable housing

Policy SHU4 - Land to south of Badgeworth Lane, Shurdington

Proposals on this site will be expected to address the following requirements:

- This site should be planned together with Site SHU1 to form a cohesive development. Proposals must explore and implement opportunities for a vehicular and pedestrian access route to be provided between the two sites and connecting any separate access points to Badgeworth Lane
- Public open space should form an integral part of the site layout across the site
- The proposal should contribute to the wider green infrastructure network, deliver biodiversity net gains and mitigate against increased recreational pressures on the Cotswold Beechwoods Special Area of Conservation
- The development should incorporate the suggested mitigation within the Tewkesbury Borough Plan – Assessment of Site Allocation Impacts on the Cotswold AONB (Toby Jones Associates, May 2019)
- The proposal should provide suitable measures to mitigate noise and dust impacts from the nearby aggregate processing facility on the new residents occupying the site
- The proposal should address the relevant site specific Green Belt mitigation guidelines set out at Appendix 1 of the Part 2 (Partial) Green Belt Review (LUC, July 2017)

Policy TOD1 - Land adjacent to Pheasant Public House, Toddington

Proposals on this site will be expected to address the following requirements:

- The development should be landscape led in order to aid assimilation into the surrounding landscape and filter long distance views from the AONB. Existing trees and hedges along the

southern and eastern site boundaries should be retained and reinforced (where necessary), and comprehensive new tree and hedge planting should be provided throughout the interior of the site. The development should incorporate the suggested mitigation within the Tewkesbury Borough Plan – Assessment of Site Allocation Impacts on the Cotswold AONB (Toby Jones Associates, May 2019)

- The proposal should contribute to the wider green infrastructure network and deliver biodiversity net gains
- The proposed site layout must address the mains gas pipeline in the vicinity of the site and its associated easement

Policy WOO1 - Land adjacent Oxbutts Caravan Park, Woodmancote

These sites (Site A1 and A2) represent an opportunity for the expansion of the adjacent mobile home park. The sites should form an integral part of the mobile home park and should be accessed from within it. These sites are not considered to be suitable for the development of conventional dwelling houses due to the identified access constraints and sensitivity of the landscape setting.

Proposals on this site will be expected to address the following requirements:

- All existing trees (including those along the site boundaries) should be retained, and new planting should be provided, in order to screen the sites from views from within the AONB. The proposal should contribute to the wider green infrastructure network and deliver biodiversity net gains
- The development should incorporate the suggested mitigation within the Tewkesbury Borough Plan – Assessment of Site Allocation Impacts on the Cotswold AONB (Toby Jones Associates, May 2019)

Policy FOR1 - Land at corner of Bishops Walk and School Lane, Forthampton

In assessing proposals on this site careful consideration will be given to the design and siting of the development and its effect on the character of the settlement, its historic environment and its rural landscape setting

Reasoned Justification

- 3.11. As proposed in Policy SP2 of the Joint Core Strategy, to meet the development needed in Tewkesbury borough for new homes during the plan period to 2031. The requirement is a minimum of 9,899 new homes between 2011-2031.
- 3.12. At least 7,445 dwellings (as of April 2017) will be provided through existing commitments, development in Tewkesbury Town in line with its role as a market town, smaller scale development meeting local needs at Rural Service Centres and Service Villages, and sites covered by any Memoranda or Agreement.
- 3.13. Policy SP2 does not identify a specific housing requirement for Tewkesbury Town. It should be noted however that, as of June 2017, Tewkesbury Borough has an identified shortfall of 2,455 dwellings against the total JCS housing requirement. Whilst this is to be primarily addressed by strategic allocations at the Tewkesbury Town area through a JCS plan review, the smaller scale (non-strategic) sites identified within the Borough Plan will have a role to play in contributing towards addressing the shortfall. Tewkesbury is the top tiered settlement within the Borough's settlement hierarchy based on its high level of services, facilities, local employment opportunities and good transport links. The Tewkesbury Town area is therefore the main focus for significant new housing growth in the Borough.
- 3.14. As such, this Pre-Submission version of the Borough Plan includes all non-strategic scale sites within and adjacent to the Tewkesbury town area that are considered to be suitable options for allocation in accordance with the site selection criteria set out at the Housing Background Paper (HBP). This plan does not however include housing site options located at Ashchurch and Northway. Housing and employment growth within this wider area is to be planned strategically as part of an immediate review of the Joint Core Strategy. It is important that this plan does not prejudice the outcome of that strategic planning exercise which will allocate sites for housing and employment growth.
- 3.15. Policy SP2 apportions part of the Borough's overall housing requirement to the Rural Service Centres and Service Villages. The Rural Service Centres will accommodate 1,860 new homes and the Service Villages will accommodate 880 new homes to 2031. Much of this development has already been committed. Based on the data as of June 2018, the balance to be found is 14 dwellings at the Rural Service Centres and 89 dwellings at the Service Villages.

- 3.16. The level of development for the rural areas reflect the level of development over the previous plan period, while providing a boost to the overall supply of housing in line with the National Planning Policy Framework.
- 3.17. The JCS does not disaggregate the housing requirement for the Rural Service Centres and Service Villages and apportion it to each settlement. It does however provide a framework for this distribution process to be followed in the preparation of the Borough Plan, with Policy SP2 requiring that the levels of development for the Rural Service Centres and Service Villages should be proportional to their:
- Size (number of houses)
 - Function (availability of services)
 - Proximity and accessibility to Cheltenham and Gloucester (distance by road, public transport and bicycle)
- 3.18. This distribution process must also take into account social, economic and environmental factors that may impact upon the ability of settlements to accommodate the amount of development that has been calculated. The methodology for the distribution of housing development within Tewkesbury Borough is set out within the HBP.

In addition to the allocations at Tewkesbury town, the Rural Service Centres and Service Villages in accordance with Policy SP2, one site allocation is located at Forthampton whereby there are community aspirations to enable a small amount of new housing within the settlement to support its vitality. The site allocation featured at Policy RES1 has been put forward by a local landowner with the support of the Parish Council. Whilst allocating land for housing at Forthampton does not feature as part of the JCS spatial strategy set out at Policy SP2, in accordance with Policy SP10 there can be other specific exceptions/circumstances in the district plans where housing will be permitted. In this instance the site at Forthampton is a locally driven proposal which, in the spirit of the Localism Act, is considered to be appropriate in principle. The site is however located within a sensitive context within the setting of the Conservation Area and numerous Listed Buildings. Forthampton also has a strong rural character with a low density, sporadic development set within open countryside, part of which lies within the Landscape Protection Zone. It is essential therefore that proposals on this site are sympathetic to the character of the settlement and its setting. Further information on the Council's approach to this matter is set out within the Housing

Background Paper. Furthermore, Policy RES1 allocates two sites at Brockworth (BRO1 and BRO2). At the time of writing these sites both had a resolution to grant planning permission for residential development and are therefore suitable for allocation in this plan.

- 3.19. The sites listed above would provide up to 1225 dwellings in total. It should however be noted that 81 of these dwellings are on sites that already benefit from planning permission. This leaves a remaining uncommitted supply (i.e. sites that don't already have planning permission) of 1144 dwellings. Of these uncommitted sites, 200 dwellings would be located at the Rural Service Centres and 362 dwellings at the Service Villages. This would produce a total supply (plan period commitments plus proposed allocations) of 2046 new dwellings at the Rural Service Centres and 1153 new dwellings at the Service Villages. Further to this the proposed allocations would produce up to 300 (uncommitted) new dwellings at Tewkesbury Town, 272 new dwellings at Brockworth and 10 new dwellings at Forthampton. The plan also identifies a potential windfall housing opportunity at the MAFF site through Policy RET9 (Tewkesbury Town Regeneration). This would deliver approximately 40 additional dwellings at Tewkesbury town over and above the allocated supply identified in this plan.
- 3.20. It is acknowledged that the site allocations for the Rural Service Centres and Service Villages will collectively provide in excess of the remaining SP2 requirement. This approach is however considered to be justified for the following reasons. Firstly, it should be noted that the SP2 requirement is not intended to represent a limit to housing development at the Rural Service Centres and Service Villages and indeed this is reflected in revised SP2 wording in the Adoption Version of the JCS. Secondly, it is important to identify a sufficient range of small, readily developable sites so to enable the Council to provide a continuous supply of deliverable sites to maintain 5 year's worth of housing land throughout the plan period. Thirdly, it is important to provide flexibility within the plan so it can adapt to rapid change (for example non-forecasted demographic changes and consequent changes to housing requirements) and prevent it becoming out of date.
- 3.21. At the same time however, it is important to ensure that the levels of housing growth identified for each settlement are balanced alongside the size, function and accessibility of the settlement, whilst avoiding adverse environmental and social impacts (for example landscape harm and harm to the social wellbeing of the community). Careful consideration has been given to the levels of housing growth identified for each settlement within the HBP and the site options featured within

this document are considered to represent a balanced, sustainable approach to the Borough's development.

- 3.22. In order to address the constraints and issues identified in the HBP and associated evidence base documents, site specific development principles have been defined for those housing site allocations that do not already benefit from planning permission. The site specific principles should be addressed in addition to the general development principles set out at Policy RES6 of this plan, the Design Requirements at Policy SD4 of the Joint Core Strategy and all other relevant policies within the Development Plan and its associated Supplementary Planning Guidance.

Policy RES2 Settlement Boundaries

Within the defined settlement boundaries of the Tewkesbury Town Area, the Rural Service Centres, the Service Villages and the Urban Fringe Settlements (which are shown on the policies map) the principle of residential development is acceptable subject to the application of all other policies in the Local Plan.

In all cases development must comply with the relevant criteria set out at Policy RES5.

Reasoned Justification

- 3.23. The NPPF advises that, to promote the development of a good mix of sites, local planning authorities should (inter alia) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes. The NPPF goes on to advise at paragraph 78 that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies and decisions should avoid the development of isolated homes in the countryside unless certain circumstances apply.
- 3.24. This advice is reflected through the JCS approach to residential development (policies SP2 and SD10) which generally seeks to direct significant new development to the main urban centres and restrict new development in the open countryside. Policy SD10 does however state that, outside of allocated sites, housing development will be permitted where it is infilling within the existing

built up areas of Tewkesbury Borough's towns and villages as well as any other specific exceptions or circumstances defined in district plans.

- 3.25. The settlements to which Policy RES2 relates vary in terms of their size, accessibility and service provision (as reflected by their rank in the settlement hierarchy) but are in all cases considered to be suitable location for new housing developments that are appropriate to their size and function and compatible with their character and amenity.
- 3.26. Policies RES2 to RES4 set out the Borough Council's approach to the location of new residential development and should be considered alongside Policy SD10 of the JCS and the advice within the NPPF.

Policy RES3 New Housing Outside Settlement Boundaries

Outside of the defined settlement boundaries (identified on the Policies Map) the principle of new residential development will be considered acceptable where development being proposed consists of:

1. The reuse of a redundant or disused permanent building (subject to Policy RES7)
2. The sub-division of an existing dwelling into two or more self-contained residential units (subject to Policy RES8)
3. Very small scale development at rural settlements in accordance with Policy RES4
4. A replacement dwelling (subject to Policy RES9)
5. A rural exception site for affordable housing (subject to Policy RES6)
6. Dwellings essential for rural workers to live permanently at or near their place of work in the countryside (subject to Policy AGR3)
7. A site that has been allocated through the Development Plan or involves development through local initiatives including Community Right to Build Orders and Neighbourhood Development Orders.

Reasoned Justification

- 3.27. Within the rural areas (i.e. those parts of the Borough located outside of defined settlement boundaries) a restrictive approach is required to new residential development consistent with the advice at paragraph 79 of the NPPF and Policy SD10 of the JCS, and so to not undermine the JCS

spatial strategy and its distribution of development. Policy RES3 sets out the Council's approach to new residential development within the rural areas and should be read alongside the advice within the NPPF. Policy RES3 is however supplemented by a number of criteria based policies (RES4-RES9) to ensure resulting developments are either not isolated or present special circumstances in accordance with the advice on rural housing within the NPPF.

Policy RES4 New housing at other rural settlements

To support the vitality of rural communities and the continued availability of services and facilities in the rural areas, very small-scale residential development will be acceptable in principle within and adjacent to the built up area of other rural settlements (i.e. those not featured within the settlement hierarchy) providing:

- a) it is of a scale that is proportionate to the size and function of the settlement and maintains or enhances sustainable patterns of development;
- b) it does not have an adverse cumulative impact on the settlement having regard to other developments permitted during the plan period;
- c) it complements the form of the settlement and is well related to existing buildings within the settlement;
- d) the site of the proposed development is not of significant amenity value or makes a significant contribution to the character and setting of the settlement in its undeveloped state;
- e) the proposal would not result in the coalescence of settlements
- f) the site is not located in the Green Belt, unless the proposal would involve limited infilling in a village, limited affordable housing for local community needs (in accordance with Policy RES6) or any other exceptions explicitly stated within the National Planning Policy Framework.

In all cases development must comply with the relevant criteria set out at Policy RES5. Particular attention will be given to the effect of the development on the form, character and landscape setting of the settlement.

Reasoned Justification

- 3.28. Due to the generally low levels of service provision, job opportunities and public transport availability beyond those settlements within the hierarchy, many of the Borough's other rural settlements are only suitable for very small-scale residential development. Therefore, settlement boundaries have not been defined around the Borough's other rural settlements and no land has

been specifically allocated for residential development to help meet the Borough's objectively assessed needs to 2031. Any development that accrues from this source will therefore be 'windfalls'.

- 3.29. Some rural settlements, however, have greater sustainability credentials than others and may, for example, have 'everyday' facilities, such as a shop/ post office, a (non-fee paying) school, and/or good public transport access to neighbouring service / employment centres. Availability of everyday facilities is important in helping to reduce unnecessary traffic movements and engendering a sense of community, which helps to prevent 'social isolation'. The scale of development that will be acceptable under this policy will therefore be very small and will be commensurate with the size of the settlement, the level of service provision within the settlement and its accessibility to nearby employment/service centres. Careful consideration will also be given to the cumulative effects of development over the plan period so to avoid levels of development that are disproportionate to the scale, function and accessibility of the settlement, and to prevent piecemeal encroachment into open countryside and the consequent erosion of the Borough's rural character.
- 3.30. Proposals under this policy must also comply with the relevant requirements of Policy RES5. The impact of any development on the form, character and landscape setting of the settlement will be extremely important considerations, particularly so where sites are located in or adjacent to a Conservation Area or the AONB. Care should be taken that such development, which could include minor infilling, does not harm open spaces or gaps that make a positive contribution to the character of the settlement, including views and vistas.
- 3.31. For the avoidance of doubt, Policy RES4 does not apply to Tewkesbury town, the Urban Fringe Settlements, the Rural Service Centres and the Service Villages. These settlements are subject to housing land allocations in the JCS and/or are proposed to be subject to allocations within this plan. Settlement boundaries have been defined for these settlements so to prevent further unplanned growth beyond that within the Development Plan.
- 3.32. For the purpose of Policy RES4 and the application of Policy SD10 of the JCS, the Council will consider the built up area of the settlement to be its continuous built form as it existed at the start of the plan period and excluding:

- a) individual buildings or groups of dispersed buildings which are clearly detached from the continuous built up area of the settlement;
- b) gardens, paddocks and other undeveloped land within the curtilage of buildings on the edge of the settlement where land relates more to the surrounding countryside than to the built up area of the settlement;
- c) agricultural buildings and associated land on the edge of the settlement; and
- d) outdoor sports and recreation facilities and other formal open spaces on the edge of the settlement.

3.33. Policy RES4 does not apply to rural settlements within the Green Belt unless they relate to limited infilling in a village, limited affordable housing as a rural exception site or any other exception set out at paragraphs 145 and 146 of the NPPF. All other open market housing proposals will be regarded as inappropriate development in the Green Belt and will only be permitted in very special circumstances.

Policy RES5 New Housing Development

In considering proposals for new housing development regard will be had to the following principles, as appropriate. Proposals should:

- be of a design and layout that respects the character, appearance and amenity of the surrounding area and is capable of being well integrated within it;
- be of an appropriate scale having regard to the size, function and accessibility of the settlement and its character and amenity, unless otherwise directed by policies within the Development Plan;
- where an edge of settlement site is proposed, respect the form of the settlement and its landscape setting, not appear as an unacceptable intrusion into the countryside and retain a sense of transition between the settlement and open countryside;
- not cause the unacceptable reduction of any open space (including residential gardens) which is important to the character and amenity of the area;
- provide an acceptable level of amenity for the future occupiers of the proposed dwelling(s) and cause no unacceptable harm to the amenity of existing dwellings;
- make provision for appropriate parking and access arrangements and not result in the loss or reduction of existing parking areas to the detriment of highway safety;

- incorporate into the development any natural or built features on the site that are worthy of retention;
- address any other environmental or material planning constraints relating to the site.

Reasoned Justification

- 3.34. Policy RES5 is intended to set out the general design and Development Management considerations that will normally be applicable to residential development proposals. It is not intended as a substitute to the design requirements set out at Policy SD4 of the Joint Core Strategy to 2031 or to absolve housing proposals from the application of all other relevant policies within the Development Plan, but to act as a supplementary policy providing a condensed, simplified set of considerations for guiding such proposals.
- 3.35. Policy RES5 applies to all housing proposals including changes of use, subdivisions, rural exception sites and replacement dwellings. It is however recognised that in some cases not all of the principles will be relevant. Consideration will be required in relation to the scale, nature and location of each individual development proposal to determine which principles are appropriate. Policy RES5 is applicable to housing proposals on sites allocated in the Development Plan although it should be considered in the context of the site’s allocation and applied alongside any local or site specific policies within the respective Development Plan Documents.
- 3.36. Examples of situations where the scale of development is directed by other policies within the Development Plan include proposals on allocated sites (whereby the scale of development is subject to an allocations policy, for example RES1) and proposals on Rural Exception Sites (whereby the scale of development must be based on the evidenced needs of the locality in accordance with RES6).

Policy RES6 Rural Exception Sites

1. Proposals for affordable housing development on rural exception sites within, or on the edge of, a rural settlement will be permitted provided that:

- a. there is a proven local housing need which cannot be met in any other way;
 - b. the scale, type and tenure of development is based on the proven needs of the site locality;
 - c. the site has reasonable access to local facilities and public transport, and can be integrated into the existing community;
 - d. the development is of a scale that is proportionate to the settlement in question; and
 - e. the design and layout of the proposal respects the rural character of the area and can be satisfactorily integrated into the surrounding landscape.
2. All applications must be accompanied by an up to date housing needs survey for the locality which demonstrates there is an unmet need within that locality for accommodation by households whose needs are not met by the local housing market due to affordability (local incomes or house prices) or specific housing requirements such as older age or disability. A member of each household is required to have either:
- a. been ordinarily resident in the locality or previously lived in the locality for 6 of the last 12 months or 3 of the last 5 years; or
 - b. has a strong family connection who have been resident in the locality for at least 5 years; or
 - c. a demonstrable need by virtue of their employment to live in the area; or
 - d. any other demonstrable need to the satisfaction of the Council.
3. In all cases affordable housing units will be restricted in perpetuity to occupation by households with a member in housing need as defined above.
4. Under no circumstances will schemes be permitted where the number of affordable units exceeds the need identified in the Housing Needs Survey.
5. An element of market housing may be included within a rural exception scheme, to provide sufficient cross-subsidy to facilitate the delivery of affordable homes where viability for 100% affordable housing cannot be achieved and/or when there is zero or limited government and/or Council housing grant available.

Reasoned Justification

- 3.37. Exception sites must meet local needs and the term 'locality' within RES6 means the parish in which the site is located and adjoining parishes.
- 3.38. All schemes involving an element of market housing must be robustly justified through a viability appraisal which should highlight that the amount of any market housing included is minimised so that only sufficient finance is raised to provide the required cross-subsidy without leaving a residual profit.
- 3.39. For clarity, Policy RES6 applies to all areas of the Borough including those within the Green Belt.

Policy RES7 - Re-use of rural buildings for residential use

The re-use and conversion of redundant buildings in the rural areas (the areas located outside of defined settlement boundaries) for residential use will be permitted provided that:

1. the building is of a substantial construction, is structurally sound and is capable of conversion without the need for significant new building works and/or extension;
2. where the proposal involves a traditional building, any new works are of a scale, form, type and materials sympathetic to the character and appearance of the original building;
3. The proposal does not result in the requirement for another building to fulfil the function of the original building to be converted;
4. The proposal preserves or enhances the landscape setting of the site and respects the rural character of the area

Reasoned Justification

- 3.40. The objective of Policy RES7 is to enable the re-use and conversion of existing rural buildings that are capable of functioning as new dwellings without the need for substantial new building works. Proposals involving new works that are tantamount to a rebuild will not be acceptable under Policy RES7.
- 3.41. Where proposals involve the conversion of a traditional rural building, it will be important to preserve the essential features of the original building in the interest of conserving the Borough's agricultural heritage and landscape character. In design terms, traditional rural buildings are often characterised by their simple utilitarian appearance and traditional materials. Proposals will

therefore be looked at more favourably where they involve minimal external alteration and loss of original fabric. New doors and windows should normally be based on existing openings. Any new openings should be kept to a minimum and should reflect existing fenestration patterns. New windows and door openings should preferably be located on less conspicuous elevations away from public view. Large unbroken roof slopes are often a characteristic feature of agricultural buildings and new roof openings should be avoided where possible. Some alteration of roofs may be allowed, but only to a limited degree and on less important slopes. Flush fitting conservation roof lights that maintain the plane of roof will normally be required. Where minor new building works are required (i.e. minor repairs to brickwork or roofing), existing materials should be reused. Where this is not possible reclaimed materials should be used that match those of the existing building in form, colour and texture as far as reasonably possible.

- 3.42. In all cases, proposals must preserve or enhance the landscape setting of the site and respect the rural character of the area. Harm can result not only through inappropriate alterations but also from new driveways, car parking areas, boundary treatments and domestic paraphernalia. Care must be taken in the design and layout of such features. Hard surfaces should have a naturalised appearance. Formal drives and tarmac surfaces should be avoided. Any enclosed private areas should be carefully sited and contained, particularly in relation to public views and the surrounding landscape. New walls or planting, which can be used to screen parking and garden areas, must follow the local vernacular.
- 3.43. Extensions or new outbuildings will not normally be permitted, particularly where these would involve alien domestic features that would detract from the simple, utilitarian appearance of traditional buildings.

Policy RES8 Sub division of existing dwellings

Proposals for the sub-division of existing dwellings into two or more self-contained residential units will be permitted providing:

1. Adequate internal accommodation is provided in accordance with the Council's adopted housing space standards (Policy DES1)
2. Where proposals relate to Listed Buildings, the character, appearance and significance of the designated heritage asset is sustained or enhanced in accordance with policy HER2

3. In cases where the existing dwelling is of architectural importance, makes an important contribution to the visual and intrinsic character of the area or represents a Locally Important Heritage Asset, the proposal should preserve or enhance those features which contribute to the building's importance
4. Where proposals are located outside defined settlement boundaries, the proposal does not involve significant new extensions. Minor extensions may be permitted only where essential in order for the new units to achieve the required internal space standards
5. Any proposed extensions or alterations are acceptable in accordance with Policy RES10

Reasoned justification

- 3.44. The sub division and intensification of existing dwellings can provide an additional supply of new housing by making efficient use of the existing housing stock. Sub division proposals can also provide for smaller units, including for single person households, for which a need is identified in the Strategic Housing Market Assessment. At the same time however it is considered necessary to restrict the scale of extensions proposed as part of subdivision proposals in the rural areas where this would create additional residential units over and above those utilising existing floor space, as this would act to circumvent the objective of Policy RES3 to restrict new housing development in the countryside.
- 3.45. Subdivision proposals involving internal alterations to Listed Buildings will normally require Listed Building Consent in addition to planning permission for the intensification of use. Such proposals will be considered in relation to policy HER2. Proposals involving alterations to Locally Important Heritage Assets will be considered on their merits in accordance with Policy HER5.
- 3.46. In considering proposals involving the conversion of domestic outbuildings (including garages) to create new residential units regard will be had to whether the proposal is likely to necessitate subsequent proposals for new outbuildings to replace those converted and the implications of accommodating such buildings having regard to RES10 (Alteration and extension of existing dwellings).

Policy RES9 Replacement dwellings

The rebuilding and replacement of existing dwellings in locations outside of the defined settlement boundaries (identified on the Policies Map) will be permitted providing that:

1. The site contains a permanent dwelling with an extant, lawful residential use (i.e. it has not been abandoned)
2. In cases where the existing dwelling is of architectural importance or makes an important contribution to the visual and intrinsic character of the area, the proposal demonstrates that accommodation needs cannot be met through the alteration, extension and / or refurbishment of the existing dwelling
3. The proposed dwelling respects the size of the plot and the scale and character of existing characteristic property in the area
4. It would not have an adverse impact on the amenity of neighbouring properties
5. It would not result in inadequate parking and manoeuvring space to the detriment of highway safety
6. It has no unacceptable adverse impact on the landscape

Reasoned Justification

- 3.47. Policy RES9 does not apply to Listed Buildings, or caravans, mobile homes or dwellings subject to a temporary planning permission.
- 3.48. Renovating existing dwellings is often a more sustainable and environmentally friendly approach than replacing existing dwellings in their entirety. Furthermore, the Council has a presumption against the demolition and replacement of buildings that are of architectural or local historic interest on the basis that these normally make an important contribution to the character of the area in which they're located. The Council's Local List, when available, should be consulted to identify buildings considered by the Council to be of local historic/architectural interest, although it should not be assumed that the non-inclusion of a building on the list means that it is not of architectural or local historic interest. Where the replacement of a non locally listed building is proposed consideration will be given to whether the building is worthy of inclusion on the Local List based on the Council's defined selection criteria. Policy HER5 provides the Council's policy in relation to Locally Important Heritage Assets.
- 3.49. Replacement dwellings should respect the scale of the existing dwelling and should not involve significant size increases. Determining an acceptable size increase will be approached on a case by

case basis having regard to the effect of any previous extensions to the property, the ability to carry out further extensions under permitted development and the scale of other existing dwellings within the immediate vicinity of the site. Proposed size increases in relation to replacement dwellings in the Green Belt will not be permitted where the proposed dwelling would be disproportionately larger than the original dwelling taking into account the effect of any previous extensions.

- 3.50. Proposals should not result in the introduction of large scale dwellings of alien design and inappropriate materials which may harm the local environment and form incongruous features in the wider landscape setting.
- 3.51. The replacement of agricultural or other occupationally tied dwellings will be subject to the relevant provisions of Policy AGR3.
- 3.52. All proposals under Policy RES9 must include the demolition of the dwelling to be replaced.
- 3.53. The proposed dwelling will normally be expected to be positioned on the footprint of the existing dwelling, unless there are visual, landscape, highway safety or other environmental grounds to justify an alternative location within the existing curtilage. Proposals for replacement dwellings in alternative locations (i.e. not within the curtilage of the existing dwelling) may also be considered if there are compelling reasons to justify not locating the dwelling on the existing site (i.e. for flood risk reasons). In such circumstances the Local Planning Authority will require applicants to enter into a legal agreement requiring that the original dwelling is demolished.
- 3.54. Policy RES9 does not apply to previous residential uses that have been subsequently abandoned. Such proposals will instead be considered as new dwellings under Policy RES3.

Policy RES10 Alteration and extension of existing dwellings

Proposals for the extension and alteration of existing dwellings, and the erection of domestic outbuildings and annexes, will be permitted providing that:

1. The detailed design reflects or complements the design and materials of the existing dwelling

2. The scale of the proposal is appropriate to the character and appearance of the existing dwelling and its surrounding area
3. The domestic curtilage of the existing property is capable of comfortably accommodating the extension or outbuilding without resulting in a cramped/overdeveloped site or creating a lack of suitable parking or manoeuvring space
4. The proposal does not have an unacceptable impact on the amenity of neighbouring properties
5. The proposal respects the character and appearance of surrounding development

Where an extension or outbuilding/annexe is capable of being occupied as a separate self-contained residential unit, any planning permission will be subject to a condition restricting its occupation to being ancillary to the main dwelling.

Reasoned justification

- 3.55. Inappropriately scaled and designed extensions can detract from the appearance of the existing dwelling and cause harm the visual amenity of the area and the character and appearance of the street scene. Poorly designed proposals can also reduce the amenity enjoyed by the occupiers of adjacent properties. It is therefore important to ensure that proposals for the alteration and extension of existing dwellings are of a scale and design that respects the visual and residential amenity of the area.
- 3.56. Applications to remove conditions imposed under RES10 limiting the occupation of extensions/outbuildings to being ancillary to the main dwelling will be considered against policies RES8 and RES5 in addition to any other relevant Development Plan policies.
- 3.57. Proposals for the extension of dwellings in the Green Belt will also be considered in relation to the advice within the NPPF requiring that the extension does not result in disproportionate additions over and above the size of the original building. The Council will treat the original building as either the dwelling as originally built, or the dwelling as it existed prior to 1st July 1948 (the date of the first modern planning act), whichever date is the latest.
- 3.58. Proposals for extensions to converted rural buildings will not normally be acceptable due to their effect on the simple form and utilitarian appearance of most traditional rural buildings. However where such proposals are found to be acceptable in principle they will be considered in relation to

RES7 and its requirement for new works to be of a scale, form, type and materials sympathetic to the character and appearance of the original building.

Policy RES11 Change of use of agricultural land to domestic garden

Planning permission will be granted for the change of use of agricultural land to domestic garden providing that:

1. there is no adverse environmental or visual impact on the form, character or setting of the settlement
2. there is no significant encroachment into the surrounding countryside, and
3. the form of the extension is not incongruous with the characteristic pattern of surrounding gardens.

Reasoned Justification

- 3.59. Care must be taken when assessing proposals for the extension of residential gardens into agricultural land to ensure that this does not adversely affect the environment of the area through, for example, both the domestic landscaping of the garden, but also the future introduction of features such as sheds, areas of hardstanding, drying areas or garages. Within the Green Belt and Area of Outstanding Natural Beauty such proposals will not normally be permitted given the objectives of these designations. Where permission is granted in accordance with this policy, this must not be taken to imply that the enlarged curtilage is automatically appropriate for the extension of the existing dwelling, or the construction of new buildings. Such proposals will be assessed in relation to the relevant policies of this Plan.

Policy RES12 Affordable housing

Proposals for new residential development will be required to contribute to the provision of affordable housing in accordance with the National Planning Policy Framework and Policy SD12 of the Joint Core Strategy to 2031. The following additional thresholds and requirements will also apply:

1. Residential developments in the Designated Rural Areas that provide a net increase of 6 – 9 dwellings will be required to provide 40% affordable housing on-site

2. Outside of JCS Strategic Allocation sites, developments of 10 or more dwellings or sites with an area of 0.5 hectares or more (Borough wide) should provide 40% affordable housing on site

Calculated requirements will be rounded to the nearest whole unit.

Where there is an issue relating to the viability of development that impacts on delivery of the full affordable housing requirement, developers should consider:

- i. Varying the housing mix and design of the scheme in order to reduce costs whilst having regard to the requirements of other policies in the plan and the objective of creating a balanced housing market;
- ii. Securing public subsidy or other commuted sums to assist delivery of affordable housing
If a development cannot deliver the full affordable housing requirement, a viability assessment, conforming to an agreed methodology, in accordance with JCS Policy INF7 will be required.

Reasoned Justification

- 3.60. The Gloucestershire Strategic Housing Market Assessment (SHMA) 2014 and its 2015 update provide evidence relating to affordable housing needs in the JCS area. The 2015 SHMA update determines a need for 638 affordable houses per year across the JCS area. Policy SD12 of the JCS requires housing developments in Tewkesbury Borough comprising 11 or more dwellings or sites with a maximum combined gross floor space of greater than 1000sqm to provide 40% affordable housing in order to contribute towards meeting the identified need. The thresholds within SD12 were based on the relevant National Planning Practice Guidance at the time. However, the revised National Planning Policy Framework (2018) advises that affordable housing should not be sought for residential developments that are not major developments (other than in designated rural areas). Major development is defined in the NPPF as (for housing development) where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. The threshold for affordable housing at Policy SD12 is therefore inconsistent with the NPPF. Policy RES13 of this plan will bring the threshold for affordable housing in Tewkesbury Borough in line with the NPPF whilst maintaining the evidence based requirements set out within Policy SD12 (for example the requirement for 40% affordable housing to be provided). Policy RES13 of this Plan should be read alongside the relevant parts of JCS Policy SD12 and provides further policy relating to the affordable housing in the Borough in order to reflect local circumstances and requirements.

- 3.61. The NPPF sets out that, in Designated Rural Areas (which are defined as National Parks, Areas of Outstanding Natural Beauty and areas designated as ‘rural’ under section 157(1) of the Housing Act 1985), local planning authorities may choose to apply a lower threshold of 5 units or less. Within Tewkesbury Borough the areas within the AONB are a Designated Rural Area. Applications for new housing within the AONB will therefore be subject to the lower threshold described above and will be required to provide 40% affordable housing on schemes of 6 – 9 dwellings, which should be delivered on site. . Schemes involving 10 or more units (or sites of 0.5ha or more) will be required to provide 40% affordable housing on site regardless of their location.
- 3.62. In addition to the viability tests set out within Policy SD12 of the JCS, in exceptional circumstances the Council may be willing to accept a reduced percentage of affordable housing and/or off-site provision (full or partial), for example in situations where the development is meeting an identified specialist or local need for accommodation of a particular type that cannot be otherwise be met on the site. The Council will expect applications for such non-policy compliant schemes to be accompanied by a viability assessment in accordance with Policy SD12 of the Joint Core Strategy or other evidence clearly demonstrating why policy requirements cannot be achieved.
- 3.63. Examples of situations where the Council may be willing to accept full or partial off-site provision include where it is not physically possible or feasible to provide affordable housing on the application site, or where there is evidence that a separate site or commuted payments towards off site provision would more satisfactorily for meeting local housing need and contributing to the creation of sustainable mixed communities.
- 3.64. Situations where the Council may be willing to accept a reduced percentage of affordable housing are likely to apply where a development is meeting an identified specialist or local affordable housing need for accommodation of a particular type that cannot be otherwise be met on the site. Examples of such situations may include where the development proposes bespoke bungalows designed for disabled needs or large family homes (as affordable housing). Other examples may include difficult site conditions where development costs are exceptionally high. Such situations will however be exceptional and must be clearly evidenced to the satisfaction of the Council.

In accordance with Policy SD11 of the Joint Core Strategy to 2031 new housing developments, including affordable housing, will be expected to provide for an appropriate mix of dwelling sizes, types and tenures to meet the needs of the local area, including the needs of older people and vulnerable groups. Housing mix should be based on the most up to date evidence of local housing need and market demand, including the Strategic Housing Market Assessment, Parish Surveys and local evidence provided to support Neighbourhood Plans. In addition new developments should, where appropriate, provide the following as part of the mix of housing on site:

1. Accessible and adaptable dwellings (Regulation M4(2) Category 2) and Wheelchair user dwellings (Regulation M4(3) Category 3) in accordance with up to date evidence of local need
2. Self and CustomBuild housing plots where there is evidence of appropriate demand identified on the Council's Self and Custom Build Register

The appropriate mix of house types and sizes for each site will depend upon the size and characteristics of the site and the viability of the scheme. The local planning authority will negotiate an appropriate housing mix on a site by site basis based on the latest evidenced needs of the site locality. Generally, the larger the scale of development, the more opportunity exists for a wider range of dwelling types and sizes.

Reasoned Justification

- 3.65. The NPPF advises that the size, type and tenure of housing needed for different groups of the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).
- 3.66. Evidence on the Borough's specific housing needs is primarily set out within the SHMA update which shows that some 42.7% of new market dwellings in the Borough should be three bedroom properties, with 26.9% having two bedrooms, 19.2% containing four or more bedrooms and 11.3% having one bedroom. The largest net need for new affordable housing is for one bedroom accommodation, followed by three and four bedroom homes. Households in need requiring a two bedroom property are most likely to have their need met from the current supply.

- 3.67. The objectively assessed need projections within the SHMA update indicate that the population aged 65 or over within the JCS area is going to increase dramatically over the remainder of the plan period from 60,897 in 2015 to 87,745 in 2031, an increase of 26,848 people which equates to approximately 47% of the overall expected growth during that period.
- 3.68. The number of older household reference persons is also projected to grow quite notably; with the number of household reference persons aged 85 or over within the JCS area expected to increase by over 75% by 2031. The SHMA update reveals a strong correlation between age and long-term health problems or disability, with some 74% of those aged 80 or over in JCS area have a long term health problem or disability. Furthermore, some 16.1% of the resident population overall in the JCS area have a long-term health problem or disability (SHMA update, p38).
- 3.69. Given the significant growth in the older population and the higher levels of disability and health problems amongst older people there is likely to be an increased requirement for specialist accommodation options moving forward. The Council recognises that adaptable and wheelchair accessible homes are an important function of the housing market as they reduce the demand for specialist housing by allowing residents to remain in their own home for longer. As a result, there needs to be an increase over the plan period in the overall percentage of new homes built to adaptable and accessible standards. In 2015, the Government introduced new 'optional' Building Regulations standards relating to accessible and adaptable dwellings and wheelchair user or wheelchair adaptable dwellings (Requirement M4(2) (accessible and adaptable dwellings) and M4(3) (wheelchair user dwellings). The Council will require that a proportion of dwellings provided on sites are designed to these standards. The precise amount will be determined on a case by case basis and based on the most up to date evidence on local housing need, including the Strategic Housing Market Assessment, Parish Surveys and local evidence provided to support Neighbourhood Plans.
- 3.70. As part of a wider housing mix the Council will also encourage the provision of serviced plots to be set aside for sale to self and custom builders, subject to appropriate demand being identified on the Council's Self and Custom Build Register. In all cases proposals should be individually designed, employing innovative approaches throughout that cater for changing lifetime needs, whilst respecting the character and appearance of the surrounding development. In order to ensure that serviced plots identified and granted consent for self-build and custom housebuilding are delivered, the Council will require applicants to enter into a legal agreement which guarantees that

sites are developed as such. All self and custom build plots through this policy shall be made available and marketed appropriately for at least 12 months from the start of development, or earlier if appropriate (for example where the site is likely to be built out in less than a year). Marketing should be through an appropriate agent as well as to those on the Council's Self and Custom Build Register. If the plots have not been sold, they may either remain on the market as custom building or be built out by the developer or landowner as appropriate. Evidence of the results of the sustained marketing strategy will need to be submitted.

- 3.71. It is recommended that developers seek the advice of the Council's Housing Enabling Officer when preparing and submitting applications for planning permission, in order to establish the most up to date and locally relevant position on housing needs.

Policy RES14 Specialist accommodation for older people

Proposals for specialist accommodation for older people to meet identified needs, including residential care homes and extra care housing, will be supported where the site is acceptable in principle for new housing in accordance with Policy RES2.

Proposals in locations outside defined settlement boundaries will be permitted where there is an evidenced need that cannot be appropriately met on allocated sites or available land within settlement boundaries. In such cases the proposal must relate well to an existing settlement and provide easy access to services and facilities, including public transport, healthcare, shopping and other community facilities, thus enabling its residents' to live independently as part of the community.

The council will require affordable housing on all such developments that fall within Use Class C3 and for self-contained units within Use Class C2, in accordance with Policy SD12 of the Joint Core Strategy and Policy RES12 of this plan (Affordable Housing).

Reasoned Justification

- 3.72. Within the JCS area, Tewkesbury records the largest proportion of older person only households (households where all members are 65 or over) at 24.9% (SHMA update 2015). This is compared to 21.3% in the JCS area and 20.5% nationally.

- 3.73. The number of older household reference persons is also projected to grow quite notably; with the number of household reference persons aged 85 or over within the JCS area expected to increase by over 75% by 2031.
- 3.74. Given the dramatic growth in the older population there is likely to be an increased requirement for specialist accommodation options moving forward. The Council will therefore support in principle appropriate proposals for specialist accommodation.
- 3.75. The SHMA update and the JCS note on Older Peoples Housing² identify an additional requirement for C2 Registered Care suggesting an additional 1,558 spaces will be required within the JCS area over the remainder of the plan period, 1,007 of which should be provided within Tewkesbury Borough. This additional accommodation is required to meet the future institutional population and therefore does not form part of the new housing to meet the Objectively Assessed Need.
- 3.76. Policy RES14 applies to specialist accommodation where the primary use of the site for a residential institution falling under Class C2 of the Town and Country Planning (Use Classes) Order 1987. The Council does however recognise that proposals may also involve a C3 element (for example extra care housing) to provide for older people who can no longer live on their own but do not need 24-hour complex medical supervision. Proposals solely for the provision of C3 specialist housing, including retirement housing and general market dwellings designed to accessible/adaptable or wheelchair accessible standard are not subject to the exceptions provided by Policy RES14 and will be treated in the same way as conventional housing proposals under policies RES2 and RES3.

Policy GTTS1: Site allocations for Gypsies and Travellers

The sites listed below, and shown on the Policies Map, are proposed to be allocated as sites on which occupation will be limited to Gypsies and Travellers:

Site Allocations		Site area (hectares)	Capacity (Pitches)
Minsterworth	Land adjacent to Hygrove Place, Hygrove Lane	0.40	7
Staverton	Hillview, Bamfurlong Lane	0.89	15
The Leigh	Land adjacent to Fieldview, A38	0.37	8

² EXAM 224

The allocation of these sites is solely for the residential use of Gypsies and Travellers and only development ancillary to their residential use will be permitted.

The site below, and shown on the Policies Map, is proposed to be allocated on which occupation will be limited to Travelling Showpeople:

Site Allocations		Site area (hectares)	Capacity (Plots)
Staverton	Land off Old Gloucester Road, Staverton	1.7	9

Existing and future permanent Gypsy, Traveller and Travelling Showpeople sites will be protected in line with JCS Policy SD13.

Reasoned Justification

- 3.77. National planning policy for Gypsy, Traveller and Travelling Showpeople sites is contained in both the NPPF and the 'Planning Policy for Traveller Sites' (PPTS) 2015.
- 3.78. The Joint Core Strategy sets out the over-arching strategy for Gypsies, Travellers and Travelling Showpeople for the Borough through Policy SD13, including the required number of pitches and plots to be delivered across the plan period. Policy SD13 provides protection for existing permanent and transit sites, safeguarding them from development to alternative uses. The policy also presents a criteria based policy for determining future proposals for Gypsies, Travellers and Travelling Showpeople. However, the Joint Core Strategy does not make any specific site allocations to meet these needs.

Gypsy & Traveller Needs

- 3.79. The Gloucestershire Gypsy and Traveller Accommodation Assessment (GTAA) 2017 identified a total need for 78 Pitches, in Tewkesbury Borough, from a baseline of March 2016 to the end of the plan period in 2031. The GTAA informed the pitch targets in JCS Policy SD13. For Tewkesbury Borough the targets, presented in five year periods according to their PPTS status in planning terms, are:

Table 2 'Gypsy and Traveller Pitch Targets for Tewkesbury Borough 2016 to 2031'

	2016 - 2021	2021 - 2026	2026 - 31	Total
Travelling households	4	0	1	5
Non-travelling households	14	5	6	25
Not Known	25	11	12	48
Sub-Total	43	16	19	78

- 3.80. The needs of those who meet the PPTS definition are described as ‘Travelling Households’, those that don’t as ‘Non-Travelling Households’ and those that could not be interviewed or surveyed for the GTAA are ‘Not Known’. Although a significant proportion of needs in the Borough is made from households who are either defined as ‘Non-Travelling Households’ or whose status is not known, the Borough Council has a duty to provide culturally specific accommodation to meet the needs of all groups as part of the overall housing mix. As such, the Borough Plan seeks to address the need for 78 pitches over the plan period.
- 3.81. At the time of writing, there had been 20 pitches granted permission since April 2016. This leaves a requirement for a further 58 pitches. The allocations presented in this plan would provide for a further 30 pitches. This means that there would still be a shortfall of 28 pitches against the total needs regardless of the PPTS definition. However, no further site options were deemed to be available, suitable and achievable to deliver additional pitches. Nevertheless, existing commitments and the allocations in the Borough Plan would provide for a total of 50 pitches. This means that the pitch targets for ‘travelling households’ (5 pitches) plus the majority of the pitch targets for ‘unknown’ households (48 pitches) would have been met. As only a proportion of the ‘unknown’ households are likely to meet the PPTS definition, then the PPTS requirement to identify a supply of sites against pitch targets for gypsies and travellers (as defined by the PPTS) has been satisfied.
- 3.82. JCS Policy SD13 provides a mechanism for the consideration of further sites through the planning application process where they meet the criteria specified. In that regard, the assessment of supply can also factor in a windfall allowance for sites that may come forward outside of allocations. The evidence presented³ as part of the JCS examination set out that it would be reasonable to expect at least 2 pitches per annum to come forward as windfall which would provide for an additional 30 pitches over the 2016-2031 period.

Travelling Showpeople needs

- 3.83. The GTAA 2017 identified a total need for 24 Plots, in Tewkesbury Borough, from the same baseline of March 2016 to the end of the plan period in 2031.
- 3.84. The GTAA informed the Plot targets in JCS Policy SD13. For Tewkesbury Borough the targets, presented in five year periods according to their PPTS status in planning terms, are:

Table 3 ‘Travelling Showpeople Plot Targets for Tewkesbury Borough 2016 to 2031’

	2016 - 2021	2021 - 2026	2026 - 31	Total
Travelling households	18	2	2	22
Non-travelling households	0	0	0	0
Not Known	0	1	1	2
Sub-Total	18	3	3	24

³ EXAM 187 - Note from the JCS on Gypsy, traveller & travelling people for the inspector (Feb 2016)

3.85. Only one suitable site has been identified, for nine plots, and is allocated in this plan. No other suitable sites have been put forward to the Assessment of Land Availability for Travelling Showpeople's Yards. In order to meet the remaining target for plots the criteria set out at JCS Policy SD14 will be used to assess future proposals, as well as to safeguard existing sites from changes to alternative uses.

4. Economy and Tourism

Introduction

- 4.1. Economic Development is one of the four priorities set out in the Tewkesbury Borough Council Plan 2016-2020. To support this priority, four objectives have been identified to help achieve it:
- Be the primary growth engine of Gloucestershire's economy
 - Identify and deliver employment land within the borough, in accordance with the Joint Core Strategy and the Tewkesbury Borough Plan
 - Maximise the growth potential of the M5 junctions within the borough
 - Deliver regeneration for Tewkesbury town.
- 4.2. In 2016 the council commissioned Bruton Knowles to undertake an Employment Land and Economic Development Strategy Review (ELED SR) to provide evidence to support the Council Plan objectives and provide evidence for the Tewkesbury Borough Plan and the Economic Development and Tourism Strategy. The review provides a number of key recommendations that could be implemented to achieve economic growth in the borough. The need to bring employment land forward to provide for growth, flexibility and choice was a central conclusion to this work.
- 4.3. In order to deliver economic growth, the council has agreed the Economic Development and Tourism Strategy 2017-21. The strategy outlines how the council will help promote a strong and diverse local economy, support business growth, inform spatial planning strategy, support regeneration, encourage inward investment and maximise visitor numbers to the area. One of the strategic priorities is Employment Land Planning, which sets out that the council's development services function will support economic development objectives through:
- a. Practical solutions to facilitate business growth needs on existing and potential commercial sites.
 - b. Delivering sufficient employment land to meet the needs of the strategic plan.
 - c. Positive application of land use policy in delivery of achievable employment land sites.
 - d. Supporting key business park areas.
- 4.4. It is clear from both the Council Plan and the Economic Development and Tourism Strategy that planning, and specifically the Tewkesbury Borough Plan, has an important role to play in facilitating economic growth. It can achieve this by safeguarding existing employment assets, allocating sufficient land for new employment growth, and providing policies which support the employment needs of the area and delivering sustainable economic growth.
- 4.5. A key part of the Economic Development and Tourism Strategy is centred around the M5 growth zone and the potential for employment growth around motorway junctions. These areas present

significant opportunities for economic growth and primary opportunities revolve around Junctions 9 and 10. The Borough Council therefore supports these locations as key areas of employment growth. However, key to unlocking these sites is investment to improve the highway infrastructure to enable growth. At Junction 9 this includes looking at opportunities to increase capacity of the A46 and improving access to the motorway network, as well as the wider masterplanning of growth in this area; and at Junction 10 work is ongoing to seek to upgrade to an ‘all-ways’ movement junction, led by the County Council. As such, the Borough Plan does not allocate sites in these areas so as to not prejudice the outcome of this ongoing work. Further sites for development will be explored through the JCS review process.

Policy EMP1 Major Employment Sites

At Major Employment Sites, as defined on the Policies Map, the Borough Council will support in principle proposals for B-class employment development. It is expected that new development at these sites will normally be for B-class uses only.

Proposals for limited non-B-class development may be supported where they constitute ancillary and complementary services that promote the overall viability of the employment site.

Proposals for the expansion of Major Employment Sites may be considered where they satisfy the criteria at Policy EMP5.

The following sites are allocated as Major Employment Sites:

Location	Site	TBP Extension (Ha)
Bishops Cleeve	Cleeve Business Park	-
	Malvern View Business Park	15.9ha
Brockworth	Gloucester Business Park	-
Churchdown/Staverton	Staverton Technology Park	-
	Meteor Business Park	1.3ha
	Ashville Business Park	3.9ha
	Bamfurlong Industrial Park	4.2ha
Innsworth	Innsworth Technology Park	-
Tewkesbury	Tewkesbury Business Park	-
	Ashchurch Business Park	-

Reasoned Justification

- 4.6. The major employment sites present some of the largest and most important employment areas in the borough. This policy seeks to encourage sustainable development of these sites and retain them as prime locations for economic growth. The primary scope of identifying these sites is to encourage traditional B-class development for which there is a great demand for land. Therefore, the council will normally expect new development at these sites to be for B-class uses.

- 4.7. Proposals for non-B-class uses will therefore not normally be supported at Major Employment Sites. However, some limited non B-class uses may be supported where they provide ancillary and complementary services that would supplement the operation of the employment area. It is recognised, for example, that some serviced-based industries, such as nurseries, gyms, food outlets, can often help to promote the vitality of employment areas. Beyond this, other proposals for larger for non-B-class uses may only be considered in exceptional circumstances. Such proposals would need to demonstrate that there would be a positive economic impact that outweighs the loss of land for B-class uses and that it would not be to the detriment of the wider economic growth of the site and the wider area. Proposals would be required to demonstrate that the proposed use would be job-generating and that the viability of the Major Employment Site for B-class uses would not be compromised.
- 4.8. In this context, job generation should be the longer-term creation of employment opportunities associated with a proposal and not short-term employment resulting from the development of a site. For example, construction jobs created in the development of a housing proposal on an existing employment site would not be considered as an alternative job-generating use under this policy.
- 4.9. The ELEDSR provides a review of both existing employment sites and vacant land in Tewkesbury Borough to establish the degree of occupancy/void space across the Borough, the scope for businesses to expand on their current sites and suitable and deliverable sites for new employment space. The ELEDSR considers whether vacant/undeveloped land on existing allocated employment sites within the Tewkesbury Borough Local Plan to 2011 (TBLP) is realistically likely to be developed and whether it should be retained for employment generating uses. The ELEDSR also considers the suitability and deliverability of land presenting an opportunity for new or expanded employment allocations.
- 4.10. The Tewkesbury Borough Plan - Employment Land Background Paper (ELBP) provides a more detailed assessment of the existing undeveloped TBLP allocations and new employment land opportunities identified in the ELEDSR, and considers whether sites are suitable and achievable as new, retained or expanded employment allocations in the TBP. The Major Employment Sites identified within the TBP are based on the evidence within the ELEDSR and the ELBP and are considered to represent viable employment land allocations for which it is important to safeguard for employment use in order to achieve the objectives of the Council's Economic Development and Tourism Strategy and the Economic Development priority of the Tewkesbury Borough Council Plan.
- 4.11. Proposals for the expansion of existing Major Employment Sites to provide additional B-class employment land may be considered in order to promote economic growth and the vitality and viability of the employment area. To ensure that proposals for expansion are sustainable the criteria set out at Policy EMP5 must be satisfied. In balancing the need to develop new employment land against the environment impacts, the Borough Council will also have regard to the availability and suitability of existing employment land in the locality as well as the economic benefits of the proposal.
- 4.12. Further to the Major Employment sites referred to at EMP1, the ELEDSR identifies that some of the most important and deliverable sites in the Borough are adjacent to Gloucestershire Airport. This

area is however located within the Green Belt and the Tewkesbury Part 2 (Partial) Green Belt Review (2017) identifies that the area serves a critical role as Green Belt. Unlocking the employment development potential of the airport whilst working within Green Belt policy presents a key challenge for the TBP. The Council’s approach to addressing this matter is set out within the Green Belt section of this plan.

Policy EMP2 Rural Business Centres

At Rural Business Centres, as defined on the Policies Map, the Borough Council will support in principle proposals for B-class employment development.

New development proposals at Rural Business Centres, including redevelopment, intensification and extensions, will be supported providing that they are of an appropriate scale and design having regard to the character of existing buildings on the site and the rural landscape of the area.

Proposals for the proportionate, small-scale expansion of Rural Business Centres may be considered where they satisfy the criteria at Policy EMP5.

The following sites are allocated as Rural Business Centres:

Location	Site	TBP Extension (Ha)
Ashchurch Rural	Homedowns Achievement Park	-
	Newton Farm Business Park	-
Bishops Cleeve	Homelands Farm	1.4ha
Deerhurst	Highfield Farm	2.7ha
The Leigh	Knightsbridge Business Centre	2.2ha
Gretton	Park Farm Industrial Estate	-
Highnam	Highnam Business Centre	1.9ha
Maisemore	The Steadings	
Toddington	Orchard Industrial Estate	6.5ha
Twigworth	Twigworth Court	-
Twyning	Brockridge Farm Business Centre	3.8ha
	Duddage Manor Business Park	0.42ha
Winchcombe	Isbourne Business Centre	2.11ha
	Withytrees Farm	-

Reasoned Justification

- 4.13. The Borough’s Rural Business Centres are generally located within the countryside or adjacent to rural settlements and are characterised by the fact that they comprise a range of smaller-scale business units. These centres make an important contribution to the economy of Tewkesbury Borough and therefore their retention and growth will be supported. However, their rural location means that generally they will only be suitable for smaller-scale development that must not detract from the rural character of the surrounding area.

- 4.14. Based on the evidence within the ELED SR and the ELBP it is proposed to allocate new Rural Business Centres at Homelands Farm and Withytrees Farm. The former of these sites relates to redundant farm buildings that are considered to be suitable for appropriate conversion and/or redevelopment in accordance with Policy EMP2. The latter site involves a group of former chicken sheds that have been converted to business use. Policy EMP2 seeks to formalise this site as a Rural Business Centre and enable appropriate future redevelopment proposals. It is also proposed to allocate land for the expansion of the following Rural Business Centres: Highfield Farm, Knightsbridge Business Centre, Park Farm Industrial Estate, Highnam Business Centre, Orchard Industrial Estate, Brockridge Farm Business Centre, Duddage Manor Business Park and Isbourne Business Centre.
- 4.15. Given the small scale and rural location of the Rural Business Centres, proposals for alternative non- B Class job generating or complementary uses are unlikely to be supported. Some limited non B-class uses may be supported where they provide ancillary and complementary services that would supplement the operation of the employment area. However any such uses must be small-scale and not detract from the overall B-class nature of the rural business centre.
- 4.16. Proposals for the expansion of existing Rural Business Centres to provide additional B-class employment land may be considered in order to promote economic growth and the vitality and viability of the employment area. To ensure that proposals for expansion are sustainable the criteria set out at Policy EMP5 must be satisfied. In balancing the need to develop new employment land against the environment impacts, the Borough Council will also have regard to the availability and suitability of existing employment land in the locality as well as the economic benefits of the proposal.
- 4.17. Where the expansion of a Rural Business Centre is found to be acceptable in principle, any resulting new buildings will be subject to the requirement of EMP2 for their scale and design to respect the character of existing buildings on the site and the rural landscape of the area.

Policy EMP3 Employment sites within settlement boundaries

Development proposals for employment uses within settlement boundaries but not on allocated sites, including redevelopment, change of use, intensification and extensions, will be supported in principle. All proposals will be required to satisfy the criteria at Policy EMP5.

In assessing proposals for the further development of an existing employment use or for the change of use to an alternative employment use, the Council will, where practical and reasonable, seek to reduce any existing significant adverse impacts on the local environment including the residential amenity of nearby properties.

Reasoned Justification

- 4.18. There are a wide variety of existing and potential employment uses within settlement boundaries of the Borough's towns and villages. These businesses add to the sustainability and vitality of settlements and will be safeguarded and supported. However, areas within existing settlements

have a more dense development pattern with a predominance of residential uses. It is therefore important that proposals are compatible with neighbouring uses so that there is not an unacceptable adverse impact on environmental quality, residential amenity or commercial viability. Policy EMP5 is intended to prevent incompatible forms of employment development within settlements.

Policy EMP4 Rural Employment Development

Within the wider rural area, outside of allocated employment sites or settlement boundaries, proposals for new employment development will be supported in principle where they:

1. involve appropriate agricultural development or diversification in accordance with Policies AGR1 and AGR2; or
2. involve the appropriate conversion of a rural building; or
3. involve the redevelopment or expansion of established employment land or an existing business occupying the site; or
4. there are specific reasons why a rural location is necessary

In all cases the scale and nature of the proposal should respect the rural character of the area and will be required to satisfy the criteria at Policy EMP5.

Reasoned Justification

- 4.19. The rural economy is important for Tewkesbury Borough and new employment development will be supported in principle where it involves the appropriate development which relates to traditionally rural bases uses, such as agriculture and forestry or the diversification of agricultural enterprises. Proposals for this type of development will be considered under policies AGR1 and ARG2.
- 4.20. Furthermore the re-use of farm and other rural buildings provide opportunities to support new businesses in the countryside in a sympathetic manner. The building to be converted should however be suitable for the proposed use and proposals will be required to demonstrate that the building is of a substantial construction, is structurally sound and is capable of conversion without the need for significant new building works and/or extension. The building proposed to be converted should also have been in existence for at least ten years and the proposal should not result in the requirement for another building to fulfil the function of the building being converted. Proposals involving the conversion of traditional rural buildings that make a positive contribution to rural character of the area should preserve the simple utilitarian appearance of the buildings and will be looked at more favourably where they involve minimal external alteration and loss of original fabric. The Reasoned Justification to Policy HOU7 of this plan provides further good practice guidance in respect of converting traditional buildings.
- 4.21. In order to support the sustainable growth and expansion of established businesses in rural areas Policy EMP4 is also intended to enable proposals for their redevelopment and expansion,

particularly where it would be unreasonable to expect the business to relocate in order to expand. However, any proposals must be of a scale that is in keeping with the character of their rural settling and in accordance with Policy EMP5.

- 4.22. It is also recognised that there may be a wide range of circumstances as to why a rural location is necessary for a new employment development proposal that is outside of agricultural uses. This may be due to the need to be in close proximity to a certain area, to access goods and materials, to be close to their workforce, or because there is no existing suitable employment land on which to locate. As such, the policy makes provision for new employment development where there are specific reasons why a rural location is necessary. Proposals for general employment development in these locations will be required to set out their justification as to why the rural location is necessary as opposed to existing employment sites or settlements. This should be undertaken to a level commensurate with scale of the proposal. Proposals are only likely to be supported under this part of the policy where they relate to the specific needs of an established business rather than speculative development proposals where no end user is identified.
- 4.23. Proposals for retail development in the rural area will be judged against the retail policies of both the Borough Plan and the JCS.
- 4.24. Proposals for new employment development in the Green Belt must be acceptable in terms of Green Belt policy set out within this plan, the JCS and the NPPF, in addition to being in accordance with the requirements of Policy EMP4.

Policy EMP5 New Employment Development (General)

Proposals for new employment development that are acceptable in principle in accordance with policies EMP1 – EMP4 will be permitted, subject to the application of other plan policies, where the following criteria are satisfied:

1. Any increase in traffic can be accommodated by the existing transport network;
2. There is provision for safe and convenient access by appropriate transport modes, commensurate with the scale and nature of the proposed development and the location of the site;
3. Satisfactory vehicular access, parking sufficient to meet demand and manoeuvring space can be provided, including sufficient parking for heavy goods vehicles where necessary;
4. The proposal would not result in an unacceptable adverse impact on the amenity of neighbouring uses, particularly residential properties;
5. The scale and design of the proposal is compatible with the character of the existing location and its setting paying particular regard to Areas of Outstanding Natural Beauty, Special Landscape Areas and the Landscape Protection Zone;

6. The proposal would not result in an unacceptable adverse environmental impact, for example by causing unacceptable levels of noise, air, water, soil or light pollution

Reasoned Justification

- 4.25. All new proposals for employment development require consideration of its impact and whether it can be delivered in a sustainable way. Policy EMP5 applies to all forms of employment development including redevelopment, change of use, intensification and extensions, on both allocated and unallocated sites, and within settlements and in the rural area. It provides a set of general Development Management Criteria that will apply to all development proposals in addition to any development/location specific considerations featured within policies EMP1 to EMP4.
- 4.26. Important in this context is the impact of development on the highway network, the accessibility of development having regard to sustainable transport objectives, and the impact of development on its surrounding area, both environmentally and on neighbouring uses.
- 4.27. Accessibility is a particularly important consideration when assessing proposals for rural employment development in locations outside of allocated employment sites or settlement boundaries. Consideration will be given to the scale and nature of the proposed development in question, its likely trip generation and the opportunities for the use of sustainable transport modes in relation to the site. In accordance with the NPPF, significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. The Council will not normally permit proposals for new employment development on isolated sites in the open countryside.
- 4.28. Determining an appropriate scale and design of development should have regard to the context of the site. For example, the Major Employment sites will generally be suitable for large scale office, industrial and warehousing uses with large car parking and servicing requirements, whereas the Rural Business Centres and proposals on unallocated rural sites are more suited to smaller scale, low profile units that can be easily assimilated into the rural landscape.
- 4.29. Environmental and amenity impacts are an important consideration when assessing proposals for new employment development, particularly where proposals are located in close proximity to residential uses. Harm to residential amenity and the local environment can result from noise, odour, vibration, air pollution and light pollution and careful consideration will be required in relation to such impacts.

Policy EMP6 Safeguarding of Employment Sites

Employment sites will be safeguarded for B-class employment uses and the loss or change of use of a site to non B-class uses will generally be resisted.

The loss of B-class employment land will only be acceptable in principle where it can be demonstrated that:

1. The site is no longer fit for purpose or capable of meeting employment needs and the proposal would not adversely impact on the viability of adjacent employment uses; or
2. The site is not appropriate for the continuation of its present, or any employment, use due to the detrimental impact on the environment or amenity of the surrounding area; or
3. The proposal would provide significant benefits to either the local economy, the sustainability of the community and/or the rural environment that would outweigh the loss of employment land.

Reasoned Justification

- 4.30. Policy EMP6 applies to all employment land falling within Class B of the [Town and Country Planning \(Use Classes\) Order 1987](#) (as amended) including Class B1 (a, b and c), B2 and B8 and any additional or amended categories featured within an equivalent use class in any new or revised version of the Order. Policy EMP6 applies to all employment land in both allocated and unallocated sites.
- 4.31. Due to the need for employment land in the Borough there will be a general resistance to any proposals that would result in the loss of employment land to non-job generating uses. This will only be considered where there is compelling evidence that the land is no longer commercially viable for meeting employment needs.
- 4.32. Proposals involving the loss or change of use of a site to non B-class uses where it is argued that the site is no longer fit for purpose or capable of meeting employment needs will need to be clearly justified and evidence provided to support loss of the employment land. In order to show that there is no demand for an existing employment site, applicants will be expected to provide evidence to the Council's satisfaction demonstrating that they have actively marketed the premises or site in question for a reasonable length of time as a going concern and at a realistic price with no success. A marketing period of 18 months will normally be required for most proposals but the Council may agree a shorter period or require a longer period depending on the scale and nature of the site in question. A feasibility study should also be submitted to demonstrate to the Council's satisfaction that redevelopment of the site for employment use is not viable.
- 4.33. The only other circumstance that the Council will consider the loss of employment land will be where the benefits of the change of use or redevelopment would have considerable beneficial impacts upon the local economy, the local environment or the amenity of the neighbouring area, either through the discontinuation of a harmful employment use, or through benefits associated with the proposed development. These benefits must significantly outweigh the benefits of the existing use to the local economy.

Policy AGR1 Agricultural Development

Proposals for new agricultural development, including intensive and industrial scale agricultural operations, to meet the needs of the agricultural business will be permitted provided that, where appropriate:

1. The proposed development is reasonably necessary and designed for the purposes of agriculture.
2. The proposed development is well sited in relation to existing buildings, access tracks, ancillary structures and works, and landscape features in order to minimise adverse impact on the visual amenity of the rural landscape paying particular regard to Areas of Outstanding Natural Beauty, Special Landscape Areas and the Landscape Protection Zone.
3. The proposed development is sympathetically designed in terms of height, mass, materials, colour and landscaping where appropriate
4. There is no unacceptable adverse impact on the amenity of residential properties or any other protected buildings, including affects from noise, light or odour pollution, including on human health.
5. Arrangements for the storage and/or disposal of waste (including manure and slurry) are satisfactory and do not have an unacceptable impact on air quality or threaten the quality of ground or surface water
6. The highway network (including site access and egress) is adequate to safely cater for the type and volume of traffic generated by the proposal.

Reasoned Justification

- 4.34. Development that supports agricultural uses in the borough will generally be supported. Where planning permission is required for an agricultural building, it is important where practicable to ensure that new buildings are located close to existing buildings or other structures and are designed in way that is sympathetic to the surrounding area. This will help minimise adverse impacts on the landscape and local environment.
- 4.35. Developments associated with the intensive rearing and accommodation of poultry, pigs or other livestock often give rise to various problems. In particular, the type and scale of such proposals can be seriously harmful to the appearance of the landscape; they can generate significant traffic, including heavy goods vehicles, which can cause serious problems of highway safety when access involves the use of narrow country lanes; and the concentration of livestock in confined conditions can create problems of noise, dust and smell from effluent. Careful control over their location and siting is therefore necessary. In particular, the storage and disposal or waste can have potential implications on air quality and increases in atmospheric nitrogen resulting from ammonia. Proposals for intensive livestock development will be expected to assess the potential impacts on air quality and demonstrate the mitigation against any adverse effects.
- 4.36. Some types of development such as houses, schools and hospitals, are particularly sensitive to nuisance and disturbance, and are classified as a 'protected building' in the General Permitted Development Order 2015. In the interest of public health and amenity it is generally not considered

appropriate to allow the development of intensive livestock within 400 metres of such buildings unless satisfactory mitigation measures can be implemented to reduce to an acceptable level, or negate, any nuisance or other impacts of the development.

Policy AGR2 – Agricultural Diversification

Proposals for farm diversification will be supported where they enhance the viability of, and do not prejudice, the continued operation of the existing agricultural business.

Diversification proposals should maximise the use of redundant buildings or structures. Where new buildings or extensions are proposed it should be demonstrated that they are essential to the new use and must be closely related to an existing group of farm buildings.

Any proposals must be of a scale and use appropriate to the rural setting and be in keeping with the character of its surroundings.

Reasoned Justification

- 4.37. The Borough Council recognises the value of farm diversification in supporting the viability of existing agricultural businesses and to the rural economy as a whole. However, it is essential that diversification projects support the continued agricultural operations and do not dominate or prejudice this primary use.

Policy AGR3 – Agricultural and other rural workers dwellings

Proposals for new dwellings for persons employed full time in agriculture, forestry, horticulture or other businesses where a rural location is essential will be permitted provided that:

1. There is an essential functional need for a new dwelling on the site based on evidenced needs of that business;
2. Financial evidence has been submitted demonstrating that the business is viable and established and has a clear prospect of remaining so;
3. The siting and landscaping of the new dwelling minimises the impact upon the visual amenity of the countryside and ensures no unacceptable adverse impact upon landscape character, particularly in the Area of Outstanding Natural Beauty, Special Landscape Areas and Landscape Protection Zone.
4. There is no other suitable and available alternative existing accommodation within the area; and
5. The occupancy of the dwelling is restricted in perpetuity to those employed in the activity for which the dwelling was originally permitted

Proposals for dwellings in relation to new agricultural, horticultural, forestry or other rural businesses may be granted a time-limited permission for temporary accommodation, such as a mobile home or caravan, to allow time to establish that the business is financially viable and there is a genuine functional need for a permanent dwelling. Temporary accommodation will normally be permitted for a period of three years, subject to meeting relevant criteria set out above. Proposals in relation to new businesses must provide clear evidence in the form of a business plan that shows a firm intention and ability to develop the enterprise on a sound financial basis.

Where permission is granted for an additional dwelling as part of an agricultural holding, and existing dwellings on the holding will be required to be retained in agricultural use; the applicant will be required to secure this through a Section 106 agreement.

Reasoned Justification

- 4.38. In the open countryside planning permission for a new dwelling is granted only in exceptional circumstances, if it is essential for a rural worker to live at or near to the work place, for example in the interests of good agricultural husbandry or forestry. It will be important to establish that stated intentions to engage in an appropriate rural business are genuine, are reasonably likely to materialise and are capable of being sustained for a reasonable period of time.
- 4.39. A functional test will be necessary in all cases to establish whether it is essential for the proper functioning of the enterprise for one or more workers to be readily available at most times. A financial test will also be applied to all proposals for new permanent accommodation, as such proposals cannot be justified on agricultural grounds unless the farming enterprise is economically viable and is likely to remain so for the foreseeable future.
- 4.40. It is important that, where permission is granted for a rural workers dwelling, it is conditional upon such a dwelling being kept available to meet the particular agricultural, forestry or other need for which it was originally intended. The occupation of the dwelling can be extended to a widow or widower of the intended occupant and to resident dependents.
- 4.41. In assessing the need for a new agricultural or forestry dwelling, Tewkesbury Borough Council will take into consideration all dwellings on or associated with the holding. Where planning permission is given, Tewkesbury Borough Council may require applicants to enter into a Section 106 Agreement to retain all dwellings on the holding for agricultural or forestry use. This will be the case where existing dwellings do not already have an occupancy condition attached to them.
- 4.42. Farm buildings within the existing farm complex or on the farm holding may be suitable for conversion to residential use and should be given preference to the construction of new buildings. Applications for the conversion of farm or other rural buildings to residential use will be considered in relation to Policy HOU7.
- 4.43. Where a dwelling is proposed in connection with a new business, or where a temporary venture is proposed, Tewkesbury Borough Council may consider granting a temporary permission for a mobile home or caravan. Whilst applications for temporary dwellings in connection with new business ventures will not be expected to demonstrate that the business is viable at the time of

application, applicants will be expected to set out a business case demonstrating a genuine intention to develop a business that has a reasonable prospect of being viable within the near future. Temporary permissions will normally be granted for up to 3 years. Applications to renew temporary permissions will only be considered where there is clear evidence that the business is well on track towards becoming established, has a good prospect of being viable within the successive temporary permission period (i.e. within the 3 year period following renewal) and the temporary permission needs to be renewed in order to enable this. If the unit is shown to be viable following the temporary permission then permission for a permanent dwelling will be considered.

Policy AGR4 – Removal of occupancy conditions

The removal of occupancy conditions on rural workers dwellings will only be permitted where:

1. The occupational dwelling no longer serves a need in connection with the agricultural holding, forestry or rural enterprise site to which it relates and there is no agricultural, forestry or essential rural business need elsewhere that it could reasonably serve, nor is it likely that any such needs will arise in the foreseeable future.
2. Satisfactory evidence has been provided that the dwelling has been marketed for sale or rent with its occupancy restriction, at a realistic price for a reasonable period of time (for at least 18 months or an appropriate period as agreed with the Local Planning Authority), and no interest has been shown in its purchase or rent.

Reasoned Justification

- 4.44. Where a dwelling is permitted in a location where new residential development is not normally acceptable on the basis of a proven agricultural or other rural business justification, then a restrictive occupancy condition will be attached to ensure that the dwelling continues to meet agricultural/rural business needs in the future. As such dwellings are only permitted exceptionally, Tewkesbury Borough Council as Local Planning Authority will similarly only permit the removal of such conditions in exceptional circumstances. Such circumstances will only apply where Tewkesbury Borough Council as Local Planning Authority is satisfied that the retention of the restrictive occupancy serves no useful agricultural/rural business purpose either now or in the future. The main factors to be taken into account are the likely demand for the occupationally tied dwelling, the changes which have taken place in the agricultural community and rural economy, and the existing stock of agricultural/rural workers dwellings in the area (both built and with planning permission). It should be emphasised that occupationally tied dwellings do not necessarily need to be sited on the holding, and that such dwellings in nearby parishes will all contribute to the total stock.
- 4.45. Marketing will be expected for agricultural or rural workers dwellings at a price of around 30% below open market value for a period of at least 18 months. Marketing must be targeted towards the occupational sector and likely client group.

Policy TOR1 - Tourism Related Development

Tewkesbury Borough Council will support proposals for tourism related development and extensions to existing tourist development provided that:

1. Where possible the proposal should involve the appropriate conversion and re-use of existing buildings;
2. There is good inclusive access for all potential users;
3. The proposal supports the plan's wider objectives, particularly in relation to conservation, transport, health, heritage conservation, recreation, economic development, the environment and nature conservation;
4. The siting, design and scale is in keeping with the built, natural and historic environment setting and wherever possible and practicable seeks to enhance it;
5. There is no unacceptable impact on the safety or satisfactory operation of the highway network.
6. Where a proposal would attract substantial numbers of visitors it should be accessible by all modes of transport, including public transport as appropriate to scale of the proposal.

Reasoned Justification

- 4.46. Tourism is an important source of employment in the Borough. It is a positive activity with the potential to benefit the community and the place, as well as the visitor and supports the rural economy particularly through farm diversification. Tourism can also help to sustain old and historic buildings which can often be adapted to tourism needs at the same time as maintaining their original character and the character of the area while offering an opportunity for historic interpretation of such buildings.
- 4.47. It is important that the positive economic and environmental benefits of tourism should be maximised while minimising any negative environmental impacts. To achieve the right balance between environmental safeguards and the management of visitors, adequate car and coach parking needs to be provided in the right locations with signing directs people to the facilities that they come to use and see.
- 4.48. It is also important that any development does not detract from or adversely affect the quality of the landscape and its visual beauty. The overriding priority is protection of the character of the landscape particularly in the Area of Outstanding Natural Beauty and to a lesser degree in the locally designated Special Landscape Area and Landscape Protection Zone.

Policy TOR2 Serviced/self catering accommodation

The development of serviced and self-catering accommodation will be permitted on sites within existing defined settlement boundaries, as identified on the Policies Map, or where the proposal results in the appropriate re-use of existing buildings or involves a proportionate extension to existing accommodation. In all cases the proposal, including provision of car parking, must respect the character of the area in which it's located.

Applications for new hotel development where an evidenced need exists will be considered on their merits having regard to the sustainability of the site location and the impact of the proposal on the character and amenity of the area.

Applications for the removal of occupancy conditions on tourist accommodation that has been built specifically for that purpose, and is located outside of settlements, will not normally be permitted. On buildings converted for tourist accommodation purposes, the proposed removal of occupancy conditions will be considered in accordance with the appropriate provisions of Policy RES7 (Re-use of rural buildings for residential use).

Reasoned Justification

- 4.49. In the interest of promoting sustainable tourist development proposals involving new accommodation should be located where they will have access to basic services (i.e. shops, public houses, public transport facilities). Policy TOR2 therefore seeks to direct such proposals to those settlements included in the settlement hierarchy set out at the Housing Section of this plan.
- 4.50. While new development will not normally be acceptable in the open countryside, it is recognised that some types of tourist accommodation are well suited to conversions of existing buildings. Within settlements there may be scope for development particularly on redundant sites or sites where a change of use would be acceptable. It is important that, where new development takes place, the amenity of adjoining residents or uses is not adversely affected. Scale, design and its effect on the existing building will be important factors in the consideration of proposals.
- 4.51. Overriding importance is given to the protection of the open countryside particularly within the Area of Outstanding Natural Beauty, and there should be no conflict with Green Belt policies. Adequate car parking must be provided and that there is no adverse impact on the surrounding environment and special landscape designations.
- 4.52. Where proposals under TOR1 and TOR2 involve the conversion and re-use of existing buildings, the building to be converted should be suitable for the proposed use and proposals will be required to demonstrate that the building is of a substantial construction, is structurally sound and is capable of conversion without the need for significant new building works and/or extension. The building proposed to be converted should also have been in existence for at least ten years and the proposal should not result in the requirement for another building to fulfil the function of the building being converted. Proposals involving the conversion of traditional rural buildings should preserve the simple utilitarian appearance of the buildings and will be looked at more favourably where they

involve minimal external alteration and loss of original fabric. The Reasoned Justification to Policy HOU7 of this plan provides further good practice guidance in respect of converting traditional buildings.

- 4.53. Large or disproportionate extensions to existing serviced and self-catering accommodation will be treated as new proposals and will be subject to the same TOR2 policy requirement for proposals to be located within defined settlement boundaries or development site allocations.
- 4.54. Proposals for new hotel development will only be permitted where there is evidenced need and the site location is considered to be acceptable from a sustainability perspective, paying particular regard to its accessibility and proximity to key services and facilities.
- 4.55. Applications for the removal of occupancy conditions on purpose built tourist accommodation located outside of settlements will only be permitted in exceptional circumstances as this is likely to result in new housing in unsustainable locations. These circumstances are likely to be limited to where there is robust evidence demonstrating an oversupply of similar tourist accommodation in the area and that the existing use of the building for tourist accommodation is no longer viable. Buildings converted for tourist accommodation purposes will be considered in the same way as proposals for the re-use of rural buildings for residential use.

Policy TOR3 Caravan and camping sites

Proposals for new or extended caravan and camping sites for tourist accommodation should be located within or adjacent to existing settlements as identified on the Policies Map or existing sites of tourism or hospitality facilities and accommodation. Proposals for new sites within the open countryside will need to demonstrate why the proposed location is essential.

All proposals must be of a scale commensurate with the surrounding area, including the scale of existing settlements. In considering all proposals, overriding protection will be afforded to the landscape and character of the area, particularly with regard to siting, topography and landscape design, as well as to the amenity of any neighbouring uses. The number and size of any associated new buildings (i.e. toilet and washing facilities) shall be kept to the minimum necessary and proposals make use of existing buildings for such purposes where possible.

All proposals must be well related to the primary road network and any local roads involved in gaining access to the site should be capable of accommodating the extra traffic generated without undue hazard or inconvenience to local residents or other road users.

Reasoned justification

- 4.56. Policy TOR3 applies to caravan, camping and chalet sites for tourism purposes and includes static caravan and log cabin sites.

- 4.57. Proposals for new or extended caravan and camping sites under this policy will only be permitted for tourist accommodation. The Council will impose conditions on permissions for sites located outside of settlements to secure tourist only occupation. Proposals for permanent residential occupation will be considered in accordance with the relevant housing policies within this plan.
- 4.58. When considering the impact of proposals on the landscape, special attention will be given to topography. Proposals located on prominent and visible slopes will not normally be acceptable. The scale of any proposals must be commensurate with the surrounding area, particularly in regard to landscape and the scale of existing settlements in the surrounding area. Proposals, by virtue of their size, should not dominate existing settlements and should avoid placing undue pressure on local infrastructure and services.
- 4.59. Proposals for permanent occupation and sites for Gypsies, travellers and travelling show people will be considered in relation to Policy GTTS1.

Policy TOR4 Herefordshire and Gloucestershire Canal Restoration

Tewkesbury Borough Council supports the restoration of the Herefordshire and Gloucestershire Canal. The line of the Herefordshire and Gloucestershire Canal is identified on the Policies Map. Tewkesbury Borough Council will safeguard the line of the Herefordshire and Gloucestershire Canal, including Maisemore Lock, from development which would prejudice its restoration to a fully navigable condition.

Reasoned justification

- 4.60. The route of the Herefordshire and Gloucestershire Canal runs from the Severn at Gloucester to Hereford via Newent and Ledbury. It was built between 1792 and 1845 and closed in 1881. The canal was built to take Welsh gauge narrow boats 72 feet in length with a beam of about 8' 6". Following its closure much of its cut was filled in and a railway was built upon it. This ironically, has probably helped to preserve the route of the canal, and it is understood that such obstructions which have occurred since the closure of the railway and canal can be circumvented.
- 4.61. The design of the restoration scheme for the canal corridor should pay careful attention to the desirability of maintaining, and where practicable, enhancing the bio-diversity of the land in question. It is anticipated that the restoration of the canal corridor will bring significant opportunities to enhance biodiversity as has been demonstrated on sites such as that at Over near Gloucester.
- 4.62. The benefits which may accrue from a properly managed canal corridor restoration project both during and following its implementation are potentially substantial and will increase as the restoration proceeds. These may be summarised as follows:

- The economic advantages to both the area surrounding the canal corridor and on the waterways route to it accruing from the tourists attracted to the canal by boat, road, cycle and foot.
- The educational value of carefully restored and interpreted historic remains.
- The recreational value of what has the potential to become a long distance footpath route in a road traffic free and highly attractive environment to the benefit of local people and tourists.
- The value to health and wellbeing of potential users.
- The nature conservation value of the restored canal corridor, (most of the channel is presently dry or filled in), carefully managed to create a rich series of new habitats.

4.63. It is important to note that most of these benefits can be achieved before the canal is fully restored for navigation.

4.64. The Herefordshire and Gloucestershire Canal Trust achieved charitable trust status in 1992 and are pursuing its aim of restoration to fully navigable standards. The Trust's achievements to date and the progress of canal restoration projects elsewhere in England suggest that this is a project with a real prospect of achieving substantial benefits for the community and is worthy of the Borough Council's support.

Policy TOR5 Gloucestershire Warwickshire Railway

Support will be given to the restoration of the Cheltenham to Stratford-upon-Avon railway line as a heritage railway. The line of the Gloucestershire-Warwickshire railway, as identified on the Policies Map, will be safeguarded from development which would prejudice its operation as a railway.

Reasoned justification

4.65. The restoration of the heritage railway, known as the Honeybourne Line, between Cheltenham and Stratford-upon-Avon is a long term project being pursued by private groups of railway enthusiasts, using the name Gloucestershire Warwickshire Railway within Gloucestershire. The company's headquarters and depot is at Toddington Station within Stanway Parish. The railway follows the foot of the Cotswold escarpment and is an increasingly important tourist attraction. Ultimately this could bring visitors to Cheltenham and Stratford-Upon-Avon as well as to other attractions such as Sudeley Castle and Stanway House within the Borough.

4.66. The Council will continue to support the potential to deliver National Cycle Network route 41 to the north of Cheltenham along the general route of the railway together with Sustrans, Gloucestershire County Council and the GWSR where appropriate. It would not be appropriate to show a specific route on the Policies Map as it is still under development by Sustrans.

5. Green Belt

Introduction

- 5.1. Green Belt is a national policy designation which primarily aims to prevent urban sprawl by keeping land permanently open. The NPPF sets out five Green Belt purposes:
- to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land
- 5.2. The Gloucester/Cheltenham Green Belt was designated in 1968 with the primary purpose of preventing Cheltenham and Gloucester from merging and to preserve the open character of the land between the towns. The first Gloucestershire County Structure Plan in 1981 extended the Green Belt to include an area north of Cheltenham in order to protect the gap between Cheltenham and Bishop's Cleeve.
- 5.3. To achieve the objectives of Green Belt designation, the NPPF advises that Local Planning Authorities should, subject to certain exceptions, regard the construction of new buildings in the Green Belt as inappropriate development. It then goes to advise that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. This policy principle prevents many forms of development from taking place in the Green Belt, including new housing and employment development.
- 5.4. In Tewkesbury Borough, this has had the effect of constraining new housing opportunities at Shurdington which is one of the Borough's largest and most sustainable Service Villages. Shurdington is entirely surrounded by Green Belt and, as of May 2017, there had only been 7 new dwellings committed at the village within the plan period. The Green Belt is also a constraint to development at Woodmancote Service Village although, as identified in this plan, there are some opportunities for growth at the village on sites located outside of the Green Belt. There are also significant housing commitments within the locality at Bishops Cleeve.
- 5.5. Further to this, in exploring potential opportunities for new employment land in the Borough the ELEDSE has identified that some of the most important and deliverable sites are adjacent to Gloucestershire airport. The Council recognises the strategic importance of the airport and supports the SEP for Gloucestershire which aims to optimise the contribution and benefit the airport and the land around it can make to local communities and the economy. It is considered essential in the interest of the Council's Economic Development and Tourism Strategy that that employment development potential of the airport is realised. At the same time however, this area

serves a critical role as Green Belt being located in the narrow gap between Cheltenham and Churchdown. Unlocking the employment development potential of the airport whilst working within Green Belt policy presents a key challenge for the TBP.

- 5.6. The NPPF advises that, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Thus, in order to investigate appropriate opportunities for growth at Shurdington and Woodmancote, and to further explore the employment development potential of Gloucestershire airport, in July 2017 the Council commissioned Land Use Consultants Ltd to undertake a Part 2 (Partial) Green Belt Review to inform the preparation of the Tewkesbury Borough Plan.
- 5.7. Having regard to the findings of the Part 2 (Partial) Green Belt Review (July 2017) and in accordance with the advice within the NPPF, it is proposed to remove land from the Green Belt in order to deliver appropriate housing growth at Shurdington, as well as land at Staverton/ Gloucestershire airport for employment growth. These changes will also enable the creation of a new, robust and defensible Green Belt boundary. For reasons set out in the Housing Background Paper and summarised in the reasoned justification below, no changes to the Green Belt boundary are proposed at Woodmancote.

Policy GRB1 – Green Belt Review

It is proposed to remove the following areas of land from the Green Belt:

1. 8.3ha of land at Leckhampton Lane, Shurdington
2. 7ha of land to the east of Shurdington Road, Shurdington
3. 2.2ha of land at corner of Badgeworth Lane and A46, Shurdington
4. 6.6ha of land to south of Badgeworth Lane, Shurdington
5. 3.5ha of land adjacent to Ashville Business Park, Staverton
6. 1.6ha of land adjacent to Meteor Business Park, Staverton
7. 3.5ha of land adjacent to Bamfurlong Industrial Park, Staverton

The boundary of the Green Belt is shown on the Policies Map.

Reasoned justification

- 5.8. The Part 2 (Partial) Green Belt Review (hereinafter referred to as ‘the Green Belt review’) appraises land at the three locations against the five nationally defined purposes of the Green Belt set out in the NPPF and draws conclusions on the potential degree of harm that may occur should land be considered for removal from the Green Belt.

- 5.9. In the case of Shurdington, both Housing Site A (land at Badgeworth Lane) and Housing Site B (land at Leckhampton Lane) are located within areas that are assessed in the Green Belt review as making a relatively weak contribution to Green Belt purposes. Consequently, the Green Belt review finds that the removal of the sites from the Green Belt would result in a relatively low level of harm to the Green Belt. The Green Belt review also identifies a number of existing built up areas adjacent to the north-east, east and south west of the village that perform weakly against Green Belt purposes as they are fully developed. This plan proposes to remove these areas from the Green Belt in order to create a new, robust and defensible Green Belt boundary.
- 5.10. The proposed removal of land from the Green Belt at Shurdington is considered to be essential in this instance in order to provide housing to meet local needs at one of the Borough's largest and most sustainable Service Villages. There are no suitable and sufficient alternatives at Shurdington that involve land located outside of the Green Belt.
- 5.11. The Green Belt review sets out a number of potential mitigation measures for each of these sites which are aimed at minimising any harm to the remainder of the Green Belt. Policy RES1 of this plan makes these mitigation measures a policy requirement through site specific policies RES1P, RES1Q and RES1S.
- 5.12. The proposed changes to the Green Belt boundary at Shurdington are shown on the Policies Map.
- 5.13. In the case of Woodmancote, there are other suitable options for providing housing at the settlement that aren't located in the Green Belt. Moreover, there is a good supply of new housing land elsewhere in the locality which would be suitable for meeting the needs of existing residents and future generations. Changes to the Green Belt at Woodmancote are not therefore considered to be justified.
- 5.14. Further evidence in relation to this matter is set out in the Housing Background Paper.
- 5.15. In the case of the Gloucestershire Airport area, this performs a critical role as Green Belt as it serves to prevent Cheltenham and Churchdown merging into one another. The area does however contain a number of significant developed areas; notably the business parks along the B4063 and the area within the airport known as the 'South East Camp' which contains the operational airport buildings (i.e. terminal buildings, hangars and storage buildings). The former of these developed areas are inset within the Green Belt and are subject to Major Employment Site designation within the Tewkesbury Borough Plan to 2011. The latter area is washed over by Green Belt but is designated within the JCS as the Non Essential Operational Area of the Airport. Within this area Policy SD5 of the JCS only permits business uses which support the airport.
- 5.16. The Council's approach for realising the employment development potential of the airport is through the careful expansion of the Major Employment Sites along the B4063 to enable general business uses; and the expansion of the Non Essential Operational Area to the south east of the airport (the South East Camp) to provide increased opportunities for business uses which support the airport. This is considered to be a more suitable approach than the creation of entirely new employment sites as there is already precedent for employment/airport related development

within these areas and it would avoid the removal of isolated parcels of land surrounded by open Green Belt on all sides.

- 5.17. The land adjacent to Ashville Business Park already benefits from planning permission for new employment development. This site therefore lacks permanence as open Green Belt and is considered suitable for removal and allocation as an expansion to the adjacent Major Employment Site. The land adjacent to Meteor Business Park and Bamfurlong Industrial Estate is assessed in the Green Belt review as part of a wider cumulative release scenario involving seven parcels of land located along the B4063. The review identifies that the openness of the land within the parcels contributes to the perceived gap between Churchdown and Cheltenham while travelling along the B4063. The release of the parcels would see additional development on either side of the road and a significant reduction in the gap between the two industrial areas. Consequently the review finds that release of all of the parcels would result in 'moderate high' harm to the Green Belt. It is however considered that the Council's approach would limit the extent of the identified harm as it would release just three of the seven parcels assessed.
- 5.18. All of the parcels proposed to be removed are identified in the ELEDSR as having very good suitability for employment development. The parcels are also considered to be deliverable; they are known to be available for development and are being actively promoted for business uses. Furthermore, the parcels are not subject to any other significant planning constraints and are considered to be developable. The Council has considered alternative approaches to delivering employment development at the airport however these would either result in a higher level of harm to the Green Belt and/or are not considered to represent deliverable and developable options. One exception to this is the land adjacent to the South East Camp. Although the removal of this area would result in 'moderate' harm to the Green Belt, it relates to an isolated parcel surrounded by Green Belt on all sides. Its removal would therefore affect the integrity of the surrounding Green Belt. It is also considered to be important to safeguard this area exclusively for business uses which support the airport rather than allocate it for general business uses, so to promote rather than undermine the significance of the airport. In view of the strategic importance of the airport, the deliverability of the identified sites and the lack of suitable alternatives it is considered that there are exceptional circumstances for the removal of the identified parcels of land.
- 5.19. Further to the Green Belt removal proposed by Policy GRB1, this plan proposes to expand the Non-Essential Operational Area of the airport as defined in the JCS. Policy GRB2 provides the Council's policy in this respect

Policy GRB2 – Gloucestershire Airport

The extent of the Non-Essential Operational Area of Gloucestershire Airport is shown on the Policies Map.

Within the Non-Essential Operational Area, commercial development that would directly support the economic and operational viability of the airport uses will be supported.

In all cases, proposals within the Non-Essential Operational Area must incorporate appropriate measures designed to mitigate the impact of the development on the surrounding Green Belt.

The Non-Essential Operational Area will be safeguarded for appropriate commercial uses or airport related development. Proposals involving non-conforming development will be resisted in order to protect the strategic economic importance of the airport and in accordance with Green Belt policy guidance within the NPPF.

Reasoned justification

- 5.20. Policy SD6 of the JCS defines 'Essential' and 'Non-Essential' Operational Areas within Gloucestershire Airport. Within the Essential Operational Area, Policy SD6 provides that new structures, buildings or extensions to buildings will only be permitted if they are essential to the operation of the airport and require an airport location. Within the Non-Essential Operational Area, Policy SD6 provides that business uses which support the airport will be permitted.
- 5.21. Policy GRB2 proposes to expand the Non Essential Operational Area featured within the JCS in order to provide greater opportunities for commercial uses which support the airport. The Non-Essential Operational Area will remain in Green Belt and any proposals for new development that do not involve commercial uses that directly support the economic and operational viability of the airport will be judged against full Green Belt policy guidance within the NPPF.
- 5.22. Whilst proposals for commercial and business development under GRB2 will remain to be treated as inappropriate development in the Green Belt, due to the strategic importance of the airport, its uniqueness within the Borough and the supportive/complementary role of the specified development types, the Council considers that such proposals are capable of demonstrating the very special circumstances required to enable the grating of planning permission. Policy GRB2 does not however absolve proposals from the application of Green Belt policy and applicants will still need to demonstrate how the proposal will support the economic and operational viability of the airport. Examples of supportive proposals may include premises for businesses within the aerospace industry, and complementary uses such as hotels, childcare facilities and educational and training facilities. Proposals will also be expected to minimise harm to the remainder of the Green Belt through appropriate design, layout and landscaping measures. Examples of potential mitigation measures are set out at Section 6 of the Green Belt review report.

Policy GRB3 - Bamfurlong Operational Policing site

Within the boundaries of the Bamfurlong Operational Policing site shown on the Policies Map, the Council will support proposals for the redevelopment and intensification of the site for operational policing and partner uses.

All proposals on the site should incorporate appropriate measures designed to mitigate the impact of the development on the surrounding Green Belt.

Any other development proposals that are not essential for operational policing and partner uses will be considered against full Green Belt policy in accordance within the JCS and NPPF.

Reasoned justification

- 5.23. The Council recognises the importance of the operational policing site at Bamfurlong. The site provides a hub for emergency response and specialist operational support for police activities undertaken throughout the County and south west region. The site's central location within the Constabulary's operational area together with its direct access to the motorway and major road systems are key factors in this regard and enable swift response times in emergencies. However, the buildings on the site, which date from the late 1970's, are becoming increasingly unfit for current purposes and are not suited to future operational policing requirements.
- 5.24. There is also a desire to expand the range of operational policing functions at the site and co locate with partners in order to improve service delivery and make the most efficient use of public property assets.
- 5.25. Whilst proposals for the redevelopment and intensification of the site for Police and emergency services purposes may represent inappropriate development in terms of Green Belt policy guidance within the NPPF, the Council recognises the importance of the site, its locational advantages and the need to modernise, upgrade and expand its facilities. It is therefore considered that proposals for the redevelopment and intensification of the site for operational policing and partner uses are capable of demonstrating very special circumstances.
- 5.26. Redevelopment proposals for police and partner uses will be expected to make effective use of the site as shown on the Policies Map, maximising built capacity whilst minimising harm to the remainder of the Green Belt through appropriate design, layout and landscaping measures. Examples of potential mitigation measures are set out within the Green Belt review report.
- 5.27. The policy support provided by GRB3 only relates to development proposals for operational policing or partner uses. All other forms of development will be considered against full Green Belt policy in accordance within the JCS and NPPF.

6. Town centres and retail

Introduction

- 6.1. The National Planning Policy Framework requires the promotion competitive town centre environments, allocate a range of sites and apply tests to determine the location of new retail developments while considering the adverse impacts that may be caused.
- 6.2. The Joint Core Strategy partly satisfies the national policy requirements setting out the retail floor space requirements for Tewkesbury, Bishop's Cleeve and Winchcombe leaving the Borough Plan to encourage new retail development, providing it meets the National Planning Policy Framework's sequential test and the Joint Core Strategy's retail hierarchy. The retail hierarchy across Tewkesbury Borough is set out in Policy RET1 and is in conformity with the Joint Core Strategy.
- 6.3. The role of the Borough Plan is provide more detailed policies relating to development within designated centres to promote their economic success, commercial viability and their general vitality as key service areas. However, the Borough Plan must also provide a strategy for approaching retail development outside of designated centres.
- 6.4. The Adopted Joint Core Strategy commits to an immediate review of retail policies across the area. At the time of writing this review is still ongoing. It is recognised that the outcomes of the retail review may have impact on the approach being taken in the Tewkesbury Borough Plan and may supersede some of its policies. However, it is considered important to provide policy guidance in the Borough Plan in this interim period.

Policy RET1 Maintaining the vitality and viability of the town, borough and local centres

The Borough Council identifies the following hierarchy of designated retail centres

Market Town	Service Centres	Local Centres
Tewkesbury	Bishop's Cleeve	Brockworth
	Winchcombe	Churchdown
		Coopers Edge
		Innsworth
		Northway

The Tewkesbury Town Centre boundary, and its primary shopping frontages, and the boundaries of the designated retail centres are identified on the Policies Map. The local centres provided within the Joint Core Strategy Strategic Allocations will also be subject to this policy.

In all cases, proposals for main town centre uses within the centres identified above, including retail and leisure development, must ensure that they:

- a. Are appropriate in location and scale, having regard to the hierarchy identified above;
- b. Support the viability and vitality of their respective retail area;
- c. Contribute to a safe, attractive and accessible environment;
- d. Are easily accessible by public transport, walking and cycling;
- e. Support any centre regeneration projects;
- f. Do not adversely impact on the amenity of neighbouring uses; and
- g. In the case of proposals at Tewkesbury Town, do not conflict with the requirements for Primary Shopping Frontages at Policy RET2.
- h. In the case of proposals at Service Centres and Local Centres (including those within Strategic Allocations), do not conflict with the requirements at Policy RET3.

Proposals for new main town centre uses on sites located outside of the designated retail centre boundaries and the local centres located within the Strategic Allocations will be considered against Policy RET4.

Reasoned justification

- 6.5. The Borough Council want to support the economic success of the designated town and retail centres to ensure their competitiveness and enhance their vitality and vibrancy. As such, there will be general support for main town centre uses within them that contribute towards this aim.
- 6.6. These retailing areas provide the location for a variety of local shopping uses which make a valuable contribution to the vitality and viability of the centre as a whole. The priority is to maintain Class A uses in these locations. Within these areas the change of use from retailing A Class uses at ground floor level will generally be resisted in order not to devalue the retail attractiveness of the shopping area as a whole. However, other main town centre uses, such as leisure and community uses, can also have an important contribution towards the success of these local centres. Therefore, the Council will consider proposals for non-A class uses for ground floor units within designated centres where it is demonstrated that the alternative use is a main town centre uses and would have a positive impact of the vitality and viability of centre and support other A class retail units.
- 6.7. The NPPF provides a definition of what constitutes 'main town centre uses' which includes retail, leisure, entertainment, cultural, office and tourism related development. The Tewkesbury Borough Plan follows this definition for the purposes of these policies. However, proposals for main town centre uses will still be expected to be of an appropriate scale relative to the position of the centre within the hierarchy set out in policy RET1.
- 6.8. Tewkesbury town will be expected to be main focus for larger-scale uses in its role as a market town. Recognising its unique position in the Borough, Policy RET2 provides specific guidance on development within Tewkesbury town centre and its primary shopping frontage. The identified services centres and local centres have an important role in meeting the retail needs of local communities; Policy RET3 provides specific guidance for these areas. The local centres provided

within the JCS Strategic Allocations will have the same status as the Local Centres identified within Policy RET1 and defined on the proposals map, and will be subject to the provisions of the policy. At the time of preparation the Strategic Allocations had not been delivered and thus it was not possible to accurately define the boundaries of their respective local centres on the proposals map. Boundaries will be defined through the future review of this plan. In the interim period, retail centre boundaries will be based on the permitted site layouts.

- 6.9. Proposals for main town centre uses will be required to be located within an appropriate designated centre as a starting point. One exception to this is office development whereby proposals for Class B1(a) office development will also be acceptable in principle on allocated employment sites and within settlement boundaries in accordance with policies EMP1-3 of this plan. Proposals for main town centre uses outside of designated centres will not usually be acceptable unless there are circumstances which justify their location having regard to policies RET4 and RET5. This follows the sequential test set out in the NPPF.
- 6.10. It will also be important that any proposals make a positive contribution to the centre in which they are to be located. This will include supporting any recognised regeneration projects that are being promoted by the Borough Council and its partners. Proposals which are likely to have a negative impact on the viability of the centre as whole, either through the use proposed or its location within the centre, will not be acceptable.
- 6.11. The full use of upper floors is strongly encouraged particularly where they are disused or underused; this will help to support a mix of uses and thus enhancing viability, while also encouraging maintenance of the whole building. Proposals should ensure that where appropriate independent access is retained or provided to upper floors.

Policy RET2 Tewkesbury Town Centre and Primary Frontages

Within the Tewkesbury Town Centre Boundary, as defined on the Policies Map (excluding the Primary Shopping Frontages), proposals for main town centre uses and residential uses will be supported.

Within the Tewkesbury Town Centre ground floor Primary Shopping Frontages, as defined on the Policies Map, proposals for Class A1 retail uses will be supported. The change of use from Class A1 retail will be permitted provided that:

1. A minimum of 60% of units within 100M of the centre point of the frontage of the application site (where this measurement is within the primary shopping frontage area) would be within Class A1; and
2. The alternative use proposed is an appropriate main town centre use which contributes towards the vitality and viability of the primary frontage

Proposals that do not meet the requirements of point 1 of this policy will only be accepted in exceptional circumstances where it can be demonstrated that an existing town centre unit is unviable and unsuitable for Class A1 use.

Proposals involving the change of use from other main town centre uses (those not falling with Class A1) within the Primary Shopping Frontages will be permitted where the alternative use proposed is also a main town centre use. On upper floors within the Primary Shopping Frontages, proposals for residential use and main town centre uses will be supported.

Reasoned justification

- 6.12. Tewkesbury High Street is the main focus of retailing activity with the Borough. It provides a range of shopping facilities in an easily accessible and convenient location for many residents, as well as providing a wider role in supporting the local economy. As such retaining and enhancing its vitality and viability is a priority. Of particular importance is securing attractive continuous shopping frontages for pedestrians. The shopping focus of the High Street containing the main concentration of A1 retail outlets is defined on the Policies Map as the primary shopping frontage. Tewkesbury Borough Council is concerned that a higher proportion of A2 –A5 uses within these prime areas could threaten the vitality and viability of the centre as a whole. However, the contribution of non-A1 town centre uses towards the success of the primary frontages should also be recognised. Therefore a flexible approach is taken where non-A1 development may be permitted providing that the predominance of A1 units a ground floor level is maintained within these areas.
- 6.13. Within Primary Frontages the Borough Council will seek to retain at least 60% of the primary shopping area within retail use (Class A1) at ground floor level. 100m will be measured using the centre point of the frontage of the application site (i.e. 50m in either direction). Where this centre point is within 50m of the edge of the primary shopping frontage, then the measurement will be up to 50m in either direction, but will not continue beyond the primary shopping frontage designation.
- 6.14. It is recognised that there may be exceptional circumstances where an existing shop unit does not meet the above criteria but is no longer viable for Class A1 uses. In these cases alternative proposals for main town centre uses may be considered where evidence is provided to the satisfaction of Council that there is no realistic prospect of an A1 use taking up the unit. This will be judged using the criteria set out within Policy RET7.
- 6.15. Outside of the primary shopping frontages the approach taken in the remainder of town centre is for a wide range of uses that contribute towards the vitality and viability of the town. The proposal maps show the town centre boundary. In addition to traditional retail, alternative uses such as tourism related development, community uses, employment uses and residential properties can all have a positive impact on the economic wellbeing of the town centre.
- 6.16. The full use of upper floors across the town centre is strongly encouraged to both support a mix of uses and thus enhancing viability, while also encouraging maintenance of the whole building. All uses which contribute towards vitality of the town will be encouraged, including residential. Proposals should ensure that where appropriate independent access is retained or provided to upper floors.

Policy RET3 Retail Centres

Within the designated retail areas of Bishop's Cleeve, Winchcombe, Brockworth, Churchdown, Innsworth, Coopers Edge, Northway and the Local Centres provided within Strategic Allocations, proposals for retail uses (A1-A5) at ground floor level will be supported.

The change of use from retail will only be supported where the alternative proposal is a main town centre use, which supports vitality and viability of the retail area, and no less than 50% of the remaining units within the designated area would be within retail uses at ground floor level. Proposals that do not meet the requirements of this policy will only be accepted in exceptional circumstances where it can be demonstrated that an existing unit is unviable and unsuitable for Class A1-A5 use.

On upper floors within the Retail Centres, proposals for residential use and main town centre uses will be supported.

Reasoned Justification

- 6.16. These retailing areas provide the location for a variety of local shopping uses which make a valuable contribution to the vitality and viability of the centre as a whole. The priority is to maintain Class A uses in these locations. Within these areas the change of use from retailing A Class uses at ground floor level will generally be resisted in order not to devalue the retail attractiveness of the shopping area as a whole. However, other main town centre uses, such as leisure and community uses, can also have an important contribution towards the success of these local centres. Therefore, the Council will consider proposals for non-A class uses for ground floor units within designated centres where it is demonstrated that the alternative use is a main town centre uses and would have a positive impact of the vitality and viability of centre and support other A class retail units. However, to maintain the retail function of the centre, the Council will expect at least 50% of units within the designated centre to be maintained as Class A1-A5.
- 6.17. It is recognised that there may be exceptional circumstances where an existing shop unit does not meet the above criteria but is no longer viable for Class A1 uses. In these cases alternative proposals for main town centre uses may be considered where evidence is provided to the satisfaction of Council that there is no realistic prospect of an A1 use taking up the unit. This will be judged using the criteria set out within Policy RET7.
- 6.18. The full use of upper floors is strongly encouraged particularly where they are disused or underused; this will help to support a mix of uses and thus enhancing viability, while also encouraging maintenance of the whole building. Proposals should ensure that where appropriate independent access is retained or provided to upper floors.

Policy RET4 Out of Centre Development

Proposals for main town centre uses, on sites located outside of designated centres will only be permitted where a sequential approach has been followed and it is demonstrated that:

i. If edge-of-centre, that there will be no significant adverse impact on the overall vitality and viability of an existing centre and that the proposals cannot be accommodated within a designated centre.

ii. If out-of-centre, that there will be no significant adverse impact on the overall vitality and viability of an existing centre and that the development is not capable of being located in a sequentially preferable location.

All proposals for retail and leisure development above the gross floorspace threshold set out in the NPPF, and not within a designated centre or on sites allocated for that use, be required to submit a full Impact Assessment.

Reasoned justification

- 6.19. Main town centre uses, including retail and leisure development, will be expected to be located within designated centres and in accordance with the settlement hierarchy set out in Policy RET1. This is in order to promote the competitiveness and vitality of existing centres and to promote sustainable patterns of travel. As such, proposals for development considered to be a main town centre uses located outside of designated centres will normally be resisted.
- 6.20. In line with the NPPF, all proposals for retail or other main town centre uses that are not located within a designated centre will need to demonstrate that there is no other more sequentially preferable sites available. It will need to be evidenced that there are no suitable sites within a designated centre in the first instance. Only if this can be satisfied will edge of centre and then out of centre sites be considered. All proposals for retail, office and leisure development above the gross floorspace threshold set out within the NPPF and not within a designated centre will also be required to submit an Impact Assessment that addresses the requirements for Impact Assessments set out in the NPPF and its PPG.
- 6.21. Office development is considered to be a main town centre uses and will be subject to this policy. However, proposals for office development located within an identified employment area will be considered acceptable providing there would be no negative impacts on the viability of an existing centre.
- 6.22. Proposals for retail uses that are outside of designated centres but relate to small shops or groups of shops in residential areas, or relate to agricultural/horticultural related retail, will be subject to policies RET5 and RET8 respectively.

Policy RET5 Single or Small groups of shops in residential areas

Schemes to establish small single shop units or small groups of shops, within Class A1-A5, within new residential areas or existing settlements will be permitted provided that such facilities:

1. Primarily serve the needs of the local community, and are of an appropriate size and scale;

2. Do not cause adverse impact by reason of traffic, parking, or disturbance to living conditions; and
3. Do not adversely affect the vitality and viability of existing retail centres.

The sequential approach will not be applied to proposals involving retail units under 280sq.m gross floorspace (either individually or cumulatively) that meet the policy criteria above. Larger retail proposals will be subject to the sequential test set at Policy RET4.

The change of use of existing single or small groups of shops will be resisted and only permitted in accordance with Policy RET7.

Reasoned justification

- 6.23. Local shopping facilities provide a valuable service to communities and settlements, particularly for people who are unable to visit larger retail centres. The Borough Council will encourage the introduction of new facilities within settlements, existing or new housing areas subject to criteria which ensure that the proposal is of an appropriate scale to serve the requirements of the immediate local community without adversely affecting other retail centres, and will not result in any adverse impact through, for example, increased traffic movements. Where new facilities are appropriate but no suitable sites exist within the communities which they are intended to serve, the Borough Council may be prepared to grant permission on sites adjacent to these areas on appropriate sites.

Policy RET6 Hot Food Takeaways

To avoid the over-concentration of hot food takeaways, the Borough Council will only grant permission for such proposals where they would not:

1. Result in more than two hot food outlets (Use Class A5) adjacent to each other; and
2. Lead to more than two hot food outlets (Use Class A5) in any continuous frontage of 10 retail units or less

If these thresholds are not breached, the Borough Council will consider proposals for Class A5 uses favourably, subject to all other retail policies, providing there would be no adverse impact on the amenity of neighbouring uses with regard to noise and odour pollution.

All applications for A5 uses must be accompanied by full details of extraction and ventilation systems required.

Reasoned Justification

- 6.24. Hot food takeaways (Class A5) make a valuable contribution to the viability of retail centres. However, the Borough Council seeks to prevent the over-concentration of these uses. The primary reason being that these uses are often closed during the day and operate mainly in the evening.

The Council want to avoid the proliferation of inactive frontages within existing centres during the day that could have a negative impact on viability and vitality. Therefore, while Class A5 units are acceptable in principle in designated centres, any clustering is to be controlled. This will help to ensure that takeaways are more evenly distributed throughout centres which will lessen the effect of any daytime inactivity.

Policy RET7 Local Shops and Public Houses

The change of use of local shops and public houses will not be permitted unless:

1. Evidence is provided that shows that the existing use is no longer financially viable and that it has been adequately marketed as a going concern at a realistic price for a period of 18 months; and
2. That efforts have been undertaken to secure the viability of the facility through applications for grant aid, business advice and discussions with community groups, parish councils, the Borough Council, the County Council, and other national or local bodies with a direct interest in rural service provision

Where the loss of a local shop or public house is to occur, preference will first be given to proposals for a change of use to another business or community operation.

The partial change of use of a shop or public house, in order to diversify the existing business and maintain its financial viability, will be encouraged. Proposals must maintain and not prejudice the continued operation of the existing business.

Reasoned Justification

- 6.25. The Borough Council recognises the role played by village stores, local shops and public houses within residential areas of the settlements which serve the day-to-day needs of local communities, particularly those people who would find it difficult to use town centres such as the elderly, those with young children or without access to a car.
- 6.26. The closure of a public house particularly where it is the only one in the settlement, would cause harm to the economic and social life of that settlement. Public houses may also provide food, and accommodation as well as being a meeting place for local groups and a good place for local advertising of public meetings or events. In tourist destinations, or on long distance footpath routes, the public house may also have a seasonal caravan or camping site, such facilities particularly where they are the only ones in the settlement, are important to visitors to the area.
- 6.27. To assess applications for the change of use or redevelopment of existing village shops and public houses, the Borough Council will require a thorough analysis of the existing operation and the attempts taken to secure the future and viability of the business.

- 6.28. Although outside of the planning process, regard should also be had to the Assets of Community Value where applicable to pubs and shops. The Localism Act 2011 provided the requirement for district councils to maintain a list of assets of community value, which can either be land or buildings, nominated by local community groups or parish councils. When listed assets come up for sale or change of ownership, the Act gives local community groups the time to develop a bid and raise the money to bid to buy the asset when it comes on the open market. The scheme is also known as the community right to bid.

Policy RET8 Agricultural/Horticultural Retail in the countryside

Proposals for new farm shops and garden centres in the countryside, as well as extensions to them, will be permitted where they are directly related and ancillary to an existing agricultural or horticultural business and the majority of the produce/products for sale are produced on the premises or holding.

Proposals for new farm shops that are not in accordance with the first requirement of this policy may be considered favourably where the majority of products sold would be produced in the local area and relate to agriculture, horticulture and other rural industries; where it can be demonstrated that there are no suitable alternative premises/sites in nearby settlements, and where the Council is satisfied that the proposal would not adversely affect the viability or vitality of local shopping facilities.

Proposals not in accordance with the provisions set out above will be considered against Policy RET4.

In all cases the proposal:

1. Must not result in an adverse landscape impact or harm to the rural character of the area
2. Must be well located in relation to the primary road network, and do not result in any adverse traffic impact
3. Should, where possible and appropriate, involve the conversion and re-use of existing buildings on the site

Special attention will be given to the siting, design and layout of buildings, structures and parking areas. The extent of buildings/ancillary structures, outdoor sales/display areas, and the range of goods which can be sold will be controlled. The scale and scope of any additional services will be restricted to ensure that they are ancillary to the main use.

Reasoned Justification

- 6.29. This policy applies to proposals for retail development in the countryside that are related to agriculture or horticulture, such as garden centres and farm shops. The countryside for the purposes of this policy is defined as those parts of the Borough located outside of defined settlement boundaries. Any wider retail proposals, both in terms of use and location, will be considered using the other relevant retail policies in this plan.

- 6.30. The Borough Council is supportive of retail development that is related to agricultural and horticultural produce and recognises the important role that this can play in the rural economy. At the same time however there is a tendency for such retail uses to diversify the range of goods sold to a point where they have no specific locational need to be in the countryside and compete with the range of goods sold in local shopping centres. This policy seeks to manage the nature of the retail activities to ensure that developments remain compatible with their rural location and would not harm the vitality and viability of the Borough's retail centres. Proposals for new farm shops and garden centres will therefore only be acceptable in principle where they are directly related and ancillary to an existing agricultural or horticultural business, and the majority of goods for sale are produced on the premises or holding. For the purpose of this policy a majority is defined as a minimum of 60%. Although it is accepted that a proportion of products will be imported from elsewhere, these must still be agricultural or horticultural produce or items directly related to these activities.
- 6.31. The Council will seek to restrict, through the use of conditions, the range of goods sold to ensure that they are compliant with this policy. Furthermore, any additional services such as cafes will be strictly controlled and will only be permitted where they are ancillary to the sale of plants, horticultural goods or food products grown on the property.
- 6.32. To support the wider rural economy and to provide some flexibility in situations where it is not possible to provide a majority of products from the farm itself, or where a farm shop would be an entirely new entity (i.e. it is not ancillary to a farm), the Council may look favourably upon proposals that would act as an outlet for local farms, nurseries and other rural industries (for example rural crafts). Such proposals will however only be acceptable where the products sold would be produced in the local area which is defined as the area within a 20 mile radius of the site. Furthermore, priority will always be given to premises/sites within settlements (rather than open countryside) and to the protection of local shopping facilities in settlements and retail centres. Proposals will therefore only be acceptable where there would be no conflict with these priorities.
- 6.33. Garden centres in particular can have a significant impact on the rural landscape given the type of goods sold, the number of buildings and structures on the site, parking areas and advertisements. This policy seeks to mitigate this impact by ensuring that new proposals are focused on an existing built or derelict site such as a redundant group of farm buildings, and sited in such a way as to minimise its visual impact. The popularity of such centres means that highway issues are often critical. The Borough Council will seek to ensure that there is no adverse impact on the local highway network. Farm shops often appropriate uses for redundant or under-used traditional buildings, particularly where a parking area can be created within a farmyard. Where this is not practicable, any new structures or buildings necessary for sales and storage must be small scale, designed and sited so as to be generally unobtrusive in the landscape.
- 6.34. Proposals for new garden centres and farm shops that are not in accordance with RET8 will be considered in relation to Policies RET4 of this plan.

Policy RET9 - Tewkesbury Town Regeneration

Tewkesbury Borough Council will support proposals that contribute towards the regeneration of Tewkesbury Town Centre.

The following sites are identified on the Policies Map as key redevelopment opportunities:

- a) Healings Mill – this site is suitable for a mixture of uses including residential, employment uses, retail and leisure, cafes, restaurants and tourist related development
- b) Spring Gardens – this site is suitable for a complementary mix of uses that add to the life and vitality of the town centre, including residential, retail and leisure, cafes, restaurants and employment uses. Public space may also be provided for markets and other events.
- c) MAFF site – this site is suitable for higher density residential uses including housing and a care home. Alternative uses, including public car parking, may be considered where they contribute positively towards the wider town centre regeneration strategy

In all cases proposals will be expected to be in conformity with the relevant development principles and parameters set out in the Tewkesbury Town Regeneration Supplementary Planning Document and, where appropriate, contribute towards the objectives and projects set out therein.

Reasoned Justification

- 6.35. The Tewkesbury Town Centre Masterplan Strategic Framework Document was published in 2012 to set out the regeneration programme for the town centre. The document contains the overarching vision and objectives for the town, key themes and development principles, and the key physical regeneration projects. The Borough Council are in the process of refreshing the masterplan and intended to adopt it as a Supplementary Planning Document in 2018.
- 6.36. Any proposals within the town centre, or that would impact on the viability and vitality of the town centre, will be expected to be in conformity with the ambitions and principles of the masterplan. In particular, proposals should not prejudice the delivery of the regeneration projects that are identified which are critical to the success of the town. This policy identifies three specific regeneration sites within the town: Healings Mill, Spring Gardens and the MAFF site. Healings Mill and Spring Gardens are proposed for a mix of uses, but are expected to contain a significant element of residential development. As such, these sites have also been allocated for housing under Policy RES1 of this plan, and is relevant to any development involving these sites. Whilst the MAFF site is considered to be suitable for residential development and/or a care home, the site may be required for alternative uses as part of the wider town centre regeneration strategy. All proposals on the site will be considered on their merits having regard to the adopted Development Plan and the Tewkesbury Town Regeneration Supplementary Planning Document. All proposals on the site should also achieve an overall enhancement to the site's biodiversity value and its contribution to the green infrastructure network; including by avoiding (or mitigating) harm to the designated Key Wildlife Site (Tewkesbury Disused Railway Line), ensuring the retention and long term protection of the mature trees on site subject to a Tree Preservation Order (No. 229) and

delivering biodiversity/green infrastructure enhancements either within the site itself or to the wider Key Wildlife Site/green corridor. The site's location within an Air Quality Management Area should also be addressed by including measures to improve air quality and providing any necessary measures to mitigate air quality impacts on new residents. Furthermore, proposals on the site will be expected to employ creative SuDS solutions and explore and implement opportunities to improve runoff rates and reduce the risk of flooding. A minimum discharge reduction of 40% will be expected. Proposals should also address the site specific FRA requirements set out within the Level 2 Strategic Flood Risk Assessment (November 2017).

7. Quality Places

Introduction

- 7.1. The quality of the both the urban and natural environment is a fundamental characteristic of the excellent quality of life that is offered in the Borough. Maintaining and building on the quality of the environment is a vital component of achieving sustainable growth and increasing the attractiveness of the Borough as place to live, work and invest. New development has an important role to play in meeting this objective and there will be an expectation that high standards of design should be incorporated into all proposals.
- 7.2. Through the National Planning Policy Framework the Government has attached great importance to the design of the built environment as well as conserving and enhancing the natural and historic environment. It endorses the fact that good design is a key aspect of sustainable development as requires local plans to develop robust and comprehensive policies to set out the expectations for the quality of development that will be expected.
- 7.3. The Joint Core Strategy provides the overarching policies in regard to design and quality of the urban environment. Policy SD5: Design Requirements provides the key strategic design policy, and overarching framework, to which all new development proposals in the Borough should adhere to. In addition, Policy SD9: Historic Environment presents the strategic guidance for development relating to heritage issues.
- 7.4. The role of the Borough Plan is to provide more locally specific guidance on design considerations that are important for the Borough.

Policy DES1 Housing Space Standards

Tewkesbury Borough Council adopts the Government's nationally described space standards. All new residential development will be expected to meet these standards as a minimum.

New residential development will be expected to make adequate provision for private outdoor amenity space appropriate to the size and potential occupancy of the dwellings proposed.

Reasoned justification

- 7.5. The Government introduced its nationally described space standards in March 2015 to provide a standardised approach to requirements and provided greater certainty for developers. The standards are set out at Appendix 1 to the plan. These are optional standards and the Borough Council has considered that there is a need to apply them in the area and that doing so would not compromise the viability of development. Evidence to support this is provided in the Tewkesbury Borough Plan - Housing Standards Background Paper.

- 7.6. These space standards will be applied to all residential development, across all types and tenures, to ensure that high quality homes are delivered that provide a sufficient amount of internal space appropriate for occupancy of the dwelling.
- 7.7. The Borough Council recognise, however, that there may be some exceptional circumstances where the minimum space standards will not be physically achievable due to other design considerations. Good examples of this may be in the conversion of particular buildings (for example Listed Buildings, non-designated heritage assets and traditional rural buildings) whose existing structure would not allow for these standards to be achieved but the Council recognises the importance of bringing the building back into viable use (subject to policies HER3, HER6 and RES6 as appropriate). In these cases the Council may consider a different approach providing that it is fully justified by the applicant and is not due to over-concentration of units within a development.
- 7.8. New residential development will also be expected to make adequate provision for private amenity outdoor space suitable to meet the needs of the occupants of that dwelling. This includes provision for communal amenity space for flats. As such, the amount of outdoor space provided should be of a scale that reflects the size of the dwelling and the potential number of occupants. Although specific standards are not provided, as a general guide, individual houses should provide a garden of a minimum depth of 10m from the rear of the property. However this should be seen as a minimum and the garden size should be based on the size of the dwelling.

Policy DES2 Street Signage & Furniture

Proposals for new signage and street furniture should demonstrate a clear and identified need and seek to protect and enhance the character of the environment. Proposals will be required to take into consideration existing signage and street furniture in the streetscape, and should be designed and sited to avoid forming an obstruction or causing visual clutter

Where new signage or street furniture is required then all opportunities should be taken to utilise existing structures for mounting, amalgamate street furniture, and remove any redundant items.

The use of pedestrian guard rails and bollards will generally not be supported unless there is an unavoidable safety requirement for their installation.

The installation of signage or street furniture that would obstruct a pedestrian walkway or cycle route will not be supported.

Reasoned Justification

- 7.9. Street signage and street furniture have an important function within the Borough in enhancing the experience of the visitor by providing clear information and directions as well as providing other essential facilities such as seating and bins. Therefore it is recognised that this infrastructure is important to the success and operation of town and village centres. However, the provision of

street furniture also has the potential to detract from the quality of the environment and impact on accessibility if it is not implemented appropriately. The Borough Council will therefore seek the provision of well designed, high quality street furniture where there is an essential requirement for it.

- 7.10. In judging whether a proposal is appropriate the Council will consider how the development would impact on visual amenity, particularly with regard to existing street furniture in the vicinity, to avoid unnecessary clutter. The Council will also consider if the implementation of any street furniture would have a negative impact on accessibility and ease of movement for all users. Opportunities for betterment, where street furniture can be improved or consolidated, will be encouraged.

Policy DES3 Advertisements, Signs & Notice Boards

Advertisements, signs and notice boards will only be permitted where they are well sited, in scale and character with, and of a design appropriate to, the building and the locality.

Directional signs for businesses, while not appropriate in a village or town street, may be acceptable in rural areas where there is no conflict with visual amenity and public safety provided that any such signs are kept to the minimum necessary (normally only one sign), and purely serve to inform customers as to the location of the business without containing additional extraneous information. Any illumination must be appropriate to its location.

Reasoned Justification

- 7.11. While signs and advertisements have an important role to play in benefiting both commerce and customers, and in many areas can provide life and interest to the street scene, at the same time Tewkesbury Borough Council is committed to ensuring that signage and advertising of an inappropriate design does not detract from the quality of either individual buildings, a shopping street, village centre or the surrounding area.
- 7.12. Within rural areas off-site signs providing directions to businesses can quickly produce an unsightly impact within the countryside and are generally inappropriate. However, advance signs which direct customers to facilities within rural areas located away from main roads and which rely on casual visitors may be appropriate, provided that such signs simply sign the location of the business without any additional information or advertisements.
- 7.13. The use of sensitive design in all areas need not compromise the purpose of the advertisement in attracting attention to a specific facility. In all cases Tewkesbury Borough Council will not grant consent for poorly sited or badly designed advertisements which can have an adverse impact over a wide area, and could also create an unfortunate precedent.
- 7.14. To be acceptable proposals must demonstrate that they are of high quality design, permanent appearance and of a size which does not detract from the visual amenity of either the building to

which it is to be attached, or the immediate locality. Signs combining more than one advertisement are often preferable. It is very unlikely that signs extending above fascia level will be acceptable.

- 7.15. Particular consideration will be given to the potential impact of illuminated signs. Where such illumination is acceptable, preference will be given to external as opposed to internal means of illumination.

Policy DES4 Shopfronts

Proposals for new shopfronts, or for alterations to existing shopfronts, including any signage, should be of a scale, style and use materials that are visually appropriate both to the buildings to which they relate and the character of the surrounding area.

In conservation areas and on listed buildings historic shopfronts should be retained and restored where possible and new features should be in keeping with the traditional features of the building and/or area.

Reasoned Justification

- 7.16. The style of shopfronts plays an important role in the townscape. Where possible, improvements will be sought to remedy poor design in an existing shopfront. Particular attention will also be paid to the colour and finish as well as the lettering styles used in proposed designs. The increasing incidence of proposals for security grilles and shutters is a particular cause of concern because of their adverse visual impact upon the street scene. Blinds or canopies of inappropriate materials, colour or form can seriously damage the visual integrity of a building and/or streetscape to the detriment of the conservation area.
- 7.17. The Borough Council will publish a Shop Front Design Guide that will be a Supplementary Planning Document. This will provide additional detail to this policy on how proposals affecting shop fronts can achieve high quality design standards. All proposals relating to shop fronts will be required to be consistent with this guidance.

Policy HER1 Conservation Areas

Proposals for development in or within the setting of conservation area will need to have particular regard to the potential impact on its character and setting. New development will be expected to preserve or enhance the character and appearance of conservation areas through high quality design and use of appropriate materials.

Proposals will be required to demonstrate a thorough understanding of the significance, character and setting of conservation areas and how this has informed proposals, to achieve high quality new design which is respectful of historic interest and local character. Proposals should reflect any conservation area appraisals and management plans.

Special attention should be given to the protection and enhancement of historic features which contribute towards the area's townscape and historic character. This includes the retention and use of traditional materials.

Full details of design and materials to be used will normally be required for development in conservation areas. Therefore, outline planning applications will generally not be appropriate.

Reasoned Justification

- 7.18. Tewkesbury Borough contains a number of Conservation Areas that have been designated for their special architectural and historical importance. It is critical that these areas are protected in order to safeguard the features that make them special. The Borough Council will therefore only grant permission for development which respects and maintains the integrity of Conservation Areas. The following Conservation Areas are designated in the Borough: Ashleworth, Bishops Cleeve, Buckland, Church End, Dumbleton, Forthampton, Great Washbourne, Gretton, Laverton, Snowhill, Stanton, Tewkesbury, Winchcombe and Woodmancote. The precise location and extent of the Conservation Areas will be shown on the Policies Map when published.
- 7.19. The character of a Conservation Area is the sum of many factors, all of which need to be considered when establishing proposals for new development. Any relevant conservation areas appraisals and management plans should be consulted at an early stage to inform new proposals.
- 7.20. In considering whether planning permission should be granted for a proposed development within a conservation area, design and siting detail will always be important factors. These should be appropriate to the character, scale, style and materials of the existing building(s) and its setting. New development of an inappropriate design or materials, or in an unsuitable location will not be supported by the Council. The use of appropriate traditional window and door designs which are sympathetic to the design of historic buildings is particularly important in maintaining the attractiveness of a conservation area. Additionally, the removal of established trees, hedges, water features and open spaces in conservation areas can harm the visual quality of the area being conserved.
- 7.21. An assessment of the appropriateness of a proposal within the conservation area can only be properly considered in the context of a full planning application. Clear, accurate and detailed drawings are essential which show the proposed development in its townscape context or setting. In the interests of ensuring that development contributes positively to preserving and enhancing the character and appearance of conservation areas, the availability of contextual information should provide a clearer view of the likely impact of development proposals for effective decision making.

Policy HER2 Listed Buildings

Alterations, extensions or changes of use to Listed Buildings, or development within their setting, will be expected to have no adverse impact on those elements which contribute to their special architectural or historic interest, including their settings.

Any proposals which adversely affect such elements or result in the significant loss of historic fabric will not be permitted.

Any alterations, extensions or repairs to the Listed Buildings should normally be carried out using the traditional materials and building techniques of the existing building.

Reasoned Justification

- 7.22. Tewkesbury Borough Council has a statutory duty to have special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest which it possesses. The character of such buildings is easily damaged by inappropriate building work which pays no regard to the building's materials. In particular, the appearance of historic buildings has in the past been adversely affected by the unsympathetic replacement of doors and windows. In determining planning applications that affect such buildings the Borough Council will have particular regard to the extent to which the proposal enhances the significance of the heritage asset. Care must also be taken in relation to respecting the setting of listed buildings.
- 7.23. Maintenance and alteration work should where possible be carried out using appropriate materials for the building concerned. This includes the use of lime rather than cement mortars and the use of stone, slate, brick and clay tile rather than reconstituted products. Timber frames are particularly vulnerable to the damaging effect of repairs using unyielding modern structural members which can cause destructive stresses as the building "breathes" with changing temperature and humidity. Technical advice, or information on where to obtain it will be offered by the Council's Conservation Officer and/or English Heritage. This policy will apply to both planning and listed building consent applications.
- 7.24. Tewkesbury Borough Council will support the change of use of listed buildings and where the alternative use is compatible with and will preserve the character and appearance of the building and its setting.
- 7.25. There are over 1800 Listed Buildings in the Borough. The location and details of these can be found at <https://historicengland.org.uk/listing/the-list/> and <http://www.natureonthemap.naturalengland.org.uk/MagicMap.aspx>.

Policy HER3 Historic Parks and Gardens

Development proposals affecting historic parks and gardens, as identified on the Policies Map, will be considered against the following criteria:

1. Development that would destroy, damage or otherwise adversely affect the character appearance or setting of historic parks and gardens (including those identified as being of special historic interest), or any of their features will not normally be permitted.
2. Planting schemes which enhance, manage or re-create features of historic parkland and gardens and associated landscape will be encouraged.

Reasoned Justification

7.26. Historic parks and gardens should be safeguarded from development that would destroy them or adversely affect their character. English Heritage has published a Register of Parks and Gardens of Special Historic Interest. There are 6 such parks and gardens within Tewkesbury Borough and these are as follows:

- Highnam Court
- Snowhill Manor
- Stanway House
- Sudeley Castle
- Toddington Manor
- Tewkesbury Cemetery

7.27. Management of historic landscapes is also needed including the re-establishment of traditional farming methods and the restoration of landscapes damaged by previous development or neglect. Regard should also be taken of the wildlife interest of parkland, and appropriate management undertaken of features important for nature conservation.

Policy HER4 Archaeological Sites and Scheduled Monuments

Scheduled Monuments and sites of national archaeological importance will be preserved in situ. Development which would lead to substantial harm or loss of these sites and their setting should be wholly exceptional and will not normally be permitted.

Where development will cause harm or loss, provision should be made for excavation and recording with an appropriate assessment and evaluation. The appropriate publication/curation of findings will be expected.

Reasoned Justification

- 7.28. Sites of national archaeological importance and scheduled monuments within the Borough form an important part of the area's character and heritage. These assets must be preserved in situ due to their historical significance. There are 56 Scheduled Monuments in the Borough. Any loss or harm to the significant of these sites and their setting should be wholly exceptional and will need to be robustly justified in line with the requirements of the NPPF. The location and details of these can be found at <https://historicengland.org.uk/listing/the-list/>.
- 7.29. Where development is to cause harm or loss then as a minimum the Borough Council will expect there to be a programme of archaeological investigation. Its scope will depend on the results of any assessment and may include survey, excavation, recording or a watching brief, and the analysis, archiving and publication as is appropriate.
- 7.30. The Gloucestershire County Council Historic Environment Record should be consulted in order to obtain an indication of the archaeological significance of potential development sites. The County Council should be consulted with at an early stage and will also be able to advise on whether any further investigation will be necessary. The results of this evaluation, together with proposals for the treatment of identified archaeological remains, should be submitted in support of a planning application.

Policy HER5 Locally Important Heritage Assets

Locally Important Heritage Assets will be conserved having regard to the significance of the asset and its contribution to the historic character of the area.

Proposals affecting a Locally Important Heritage Asset and/or its setting will be expected to sustain or enhance the character, appearance and significance of the asset.

Proposals that seek the preservation and/or enhancement of these assets will be encouraged.

Historically important groups of farm buildings will be protected from proposals for destructive development or demolition.

Reasoned Justification

- 7.31. Across Tewkesbury Borough there are a wide range of locally important heritage assets that do not benefit from a national statutory designation such as Listed Building status. However, these assets still have an important contribution to the heritage of the area and the character of the environment. These non-designated assets will be identified on the Council's 'Local List' which it intends to publish in due course. However, further local heritage asset information is available through the Gloucestershire Historic Record and should also be consulted. The retention and preservation of these heritage assets will be sought and proposals to conserve them will be

supported. Any proposals to remove or alter these assets will be assessed against the significance of the asset, the impact on the features that make the asset important and impact that the proposal would have on wider the character of the area.

- 7.32. Locally important heritage assets also includes non-designated archaeological assets across the Borough that also make a valuable contribution to the area's heritage. Proposals for new development should to preserve these where possible and, where appropriate, provision should be made for excavation and recording with an appropriate assessment and evaluation in line with Policy HER4 .

Policy HER6 Tewkesbury (1471) Historic Battlefield

Development will be expected to conserve, and where appropriate enhance, the significance of the registered site of the battle of Tewkesbury (1471) and its setting.

The development of tourism infrastructure, related to the battlefield, will be supported where the character and integrity of the battlefield and its setting would be conserved in a manner appropriate to its significance.

Reasoned Justification

- 7.33. The site of the Battle of Tewkesbury (1471) is registered by Historic England. It is a nationally important historic asset and of huge significance to the both Tewkesbury Town and the wider Borough. The Borough Council will therefore not support any proposals that would cause loss or harm of the site. As such, in general new development will not be appropriate.
- 7.34. It is recognised, however, that some small-scale tourist-related infrastructure that supports the battlefield as a tourism and education attraction may be appropriate. The public benefits of this may outweigh the outright preservation of the registered site. However, any new development must be of a high quality design that is sympathetic to the historic nature of the battlefield and sensitively designed to reduce impact of the historic landscape.

8. The Natural Environment

Introduction

- 8.1. The NPPF advises that planning policies and decisions should contribute to and enhance the natural and local environment by (inter alia) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils; recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services; minimising impacts on and providing net gains for biodiversity; preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of pollution or land instability; and remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.
- 8.2. The JCS provides a set of overarching policies in respect of landscape protection (Policy SD6), the AONB (SD7), Biodiversity and Geodiversity (SD9), Health and Environmental Quality (SD14), Flood Risk Management (INF2), Green Infrastructure (INF3) and Renewable and Low Carbon Energy (INF5). In most respects this policy framework is comprehensive enough to ensure the delivery of high quality, sustainable development within Tewkesbury Borough. There are however a number of non-strategic, local level constraints and issues that require further detailed policies to be made within this plan.

Policy LAN1 Special Landscape Areas

Proposals for new development within Special Landscape Areas, as identified on the Policies Map, will be permitted providing:

- The proposal would not cause harm to those features of the landscape character which are of significance;
- The proposal maintains the quality of the natural and built environment and its visual attractiveness;
- All reasonable opportunities for the enhancement of landscape character and the local environment are sought.

Where a proposal would result in harm to the Special Landscape Area having regard to the above criteria, this harm should be weighed against the need for, and benefits from, the proposed development. Proposals causing harm to the Special Landscape Area will only be permitted where the benefits from the development would clearly and demonstrably outweigh the identified harm.

Reasoned justification

- 8.3. Special Landscape Areas (SLA) are a local landscape designation originally introduced through the Gloucestershire Structure Plan in 1982. They are defined as areas of high quality countryside of local significance. While SLAs are of a quality worthy of protection in their own right, they also

play a role in protecting the foreground setting for the adjacent Cotswolds AONB. The SLA is defined where the topography is a continuation of the adjacent AONB and/or where the vegetation and associated features are characteristic of the AONB. For the above reasons the Council considers the SLA to be a valued landscape having regard to paragraph 170 of the NPPF.

- 8.4. The boundaries of the SLA are identified by breaks of slope, or the inclusion of the foreground setting to a change of slope and will follow identifiable physical features including ditches, rivers and streams, hedgerows and field boundaries, woodland edges, roads, public rights of way and tracks, railway lines and settlement edges. The Tewkesbury Borough Plan does not intend to alter the extent of the SLA from that featured in the Tewkesbury Borough Local Plan to 2011.
- 8.5. In assessing whether developments are appropriate it must be recognised that the Cotswold landscape is not uniform in character, and includes various forms of landscape type each with its own distinctive topography, vegetation and visual characteristics. Further information on the various landscape character types within the SLA can be found within the Gloucestershire Landscape Character Assessment and the Cotswolds AONB Landscape Character Assessment.
- 8.6. Proposals within the SLA should be landscape led and must enable the protection of those features of the landscape character which are of significance. Proposals should also seek appropriate opportunities to enhance the landscape character and the natural and built environment; for example through appropriate new planting that is compatible with the relevant landscape character type; and through the use of natural, vernacular materials for external building finishes and boundary treatments.
- 8.7. In cases where the impact of a proposed development on the setting of the AONB is a potential issue regard must also be had to AONB Policy within the Joint Core Strategy, the policies set out Cotswolds AONB Management Plan and guidance within the Cotswolds AONB Landscape Character Assessment and the Cotswolds AONB Landscape Strategy and Guidelines.

Policy LAN2 Landscape Protection Zone

Within the Landscape Protection Zone, as identified on the Policies Map, special protection is given to the ecology and visual amenity of the river environment. In considering proposals for new development within the Landscape Protection Zone regard will be had to the following, as appropriate:

- The visual and ecological effect of the new development on the river banks or the associated landscape setting of the Severn Vale;
- The impact of the development on the water environment;
- Whether the proposal would enable the protection of important landscape and environmental features within the designated area;
- Whether reasonable opportunities for the enhancement of the environment and landscape are sought, including appropriate provision for improved public access

Where a proposal would result in harm to the Landscape Protection Zone having regard to the above criteria, this harm should be weighed against the need for, and benefits from, the proposed development. Proposals causing harm to the Landscape Protection Zone will only be permitted where the benefits from the development would clearly and demonstrably outweigh the identified harm.

Reasoned Justification

- 8.8. The local authority recognises the ecological and amenity importance of the river area around the Severn, at the confluence of the Severn and Avon and along the Chelt and Leadon valleys and as such considers the area worthy of designation as a Landscape Protection Zone.
- 8.9. The Landscape Protection Zone seeks to protect, enhance and conserve the riparian landscape of the river valley including the floodplain, tributaries lined with trees, adjacent hills and areas of visual and ecological importance, such as woodland, orchards, copses, hedgerows, key wildlife sites, parkland areas and examples of traditional vernacular architecture, all of which contribute to the overall landscape quality and character of the area. Many of the natural landscape features within the LPZ are identified as habitats of principal importance under Section 41 of the Natural Environment and Rural Communities Act (priority habitats). In particular the LPZ contains large areas of coastal and floodplain grazing marsh; a priority habitat forming part of the Strategic Nature Areas identified on the Gloucestershire Nature Map; in addition to numerous traditional orchards, lowland meadows and areas of deciduous woodland amongst other priority habitats. The boundaries of the LPZ are also roughly consistent with the Severn Vale Nature Improvement Area (NIA) adopted by the Gloucestershire Local Nature Partnership. For the above reasons the Council considers the LPZ to be a valued landscape having regard to paragraph 170 of the NPPF. The Tewkesbury Borough Plan does not intend to alter the extent of the LPZ from that featured in the Tewkesbury Borough Local Plan to 2011.
- 8.10. Proposals within the LPZ should be landscape led and should enable the protection and, where appropriate, enhancement of those features which contribute to the landscape quality and ecological value of the area. A particular focus for enhancements may be through the restoration and recreation of priority habitats within the LPZ in order to reverse habitat fragmentation, although smaller scale improvements can still make an important contribution to enhancing the overall quality of the Landscape Protection Area. Further policy on priority habitats is provided at Policy NAT1. The local authority will also encourage improvements to public access within the LPZ providing there is no adverse impact on the environment and will encourage the retention and replacement of natural features.
- 8.11. The identification of the LPZ aims to protect the distinct landscape associated with the rivers within the Borough. The policy is specifically concerned with the protection of the ecology of the area, the appearance of the landscape and the safeguarding of the water environment.

Policy LAN3 Strategic Gaps

The council will protect the strategic gaps identified on the Policies Map to help retain the separate identity, character and/or landscape setting of settlements and prevent their coalescence.

Development within strategic gaps as shown on the Policies Map will only be permitted where:

- the open or undeveloped character of the gap would not be significantly adversely affected;
- the separate identity and character of the settlements would not be harmed; and
- the landscape setting of the settlements would not be harmed.

The likely impact of the proposal in conjunction with any other developments with extant planning permission will be taken into account.

Proposals in conflict with these requirements will only be permitted where the development is directly related to the essential needs of agriculture, forestry or other land based industries.

Reasoned Justification

- 8.12. Strategic gaps are required in order to help to protect the separate identity, character and landscape setting of a number of settlements between which there is open land that may be subject to development pressures.
- 8.13. The following strategic gaps are identified on the Policies Map:
- Land between Bishops Cleeve and Gotherington
 - Land between Twyning and Church End
 - Land between Winchcombe and Greet
- 8.14. With regard to land between Bishops Cleeve and Gotherington, the Landscape and Visual Sensitivity Study for the Rural Service Centres and Service Villages (LVSS) (Toby Jones Associates Ltd, November 2014) identifies that this area (parcels Bish-01 and Goth-01) is overlooked from elevated vantages including national trails, popular viewpoints and the heritage railway, and finds the parcel to be of high visual sensitivity due to its important role in separating Bishops Cleeve from Gotherington.
- 8.15. With regard to land between Twyning and Church End, Policy ENV2 of the Twyning Neighbourhood Plan (2011-2031) requires that development proposals should ensure the retention of the open character of the countryside between Twyning Village and Church End and not detract from this open and undeveloped character. Furthermore, it is considered that this area contributes to the open rural setting of Church End's Conservation Area.
- 8.16. With regard to land between Winchcombe and Greet, the LVSS finds the landscape character sensitivity of this area to be high as it provides a sense of openness between the two settlements. Further to this the Winchcombe Town Landscape Sensitivity Study (Toby Jones Associates Ltd,

November 2014) finds that new development within this area would have an important adverse effect on local landscape character and an important adverse effect on visual receptors as it would reduce the sense of separation between Greet and Winchcombe.

- 8.17. For the reasons stated above it is considered to be important to protect the identified gaps from development which would adversely affect their open, undeveloped character; reduce the separation between the named settlements; and harm their landscape setting.
- 8.18. Whilst the policies elsewhere in this plan provide some control of development in the countryside, they do allow for exceptions such as rural exception sites, certain forms of employment development and tourism related development to name a few.
- 8.19. As such there is a risk that, without the added protection of strategic gaps, the separate identity and character of the settlements, and/or their landscape setting would be significantly adversely affected. There would particularly be a risk of gradual incremental development, and where the gap is narrow there would be a potential risk of coalescence of the settlements.
- 8.20. Strategic gaps are not intended to prevent all forms of development and will inevitably include some development already. There may be opportunities, through appropriate location, siting and design, to accommodate some new development in a strategic gap without significantly adversely affecting the open or undeveloped character of the gap, or harming the separate identity and character of the settlements, or their landscape setting (i.e. by locating some limited development within an existing group of buildings or by re-using or redeveloping existing buildings). Furthermore, there are numerous existing land based businesses (i.e. farms) located within the strategic gaps. These form an essential part of the rural economy and their associated buildings are generally viewed as being appropriate in the rural landscape. The requirements of Policy LAN3 do not therefore apply to development **directly related to the essential needs of agriculture** or other land based industries although these will still need to have an acceptable impact on the landscape in accordance with Policy AGR1 and Policy SD6 of the JCS in addition to those policies relating to specific landscape designations.

Policy LAN4 Locally Important Open Spaces

Locally Important Open Spaces (as identified on the Policies Map) will be protected from new development that would adversely affect their open character and appearance.

Development resulting in an adverse effect on the open character and appearance of a Locally Important Open Space will only be permitted where it would result in benefits to the community that would outweigh the importance of the open space.

Reasoned justification

- 8.21. The Borough Council considers that the reduction or loss of the defined Locally Important Open spaces may adversely affect the character and setting of the settlements in which they are

located. These areas are considered to be of amenity value to the public, clearly visible and important to the character of the settlement and the street scene. Appendix 2 lists the Important Open Spaces together with a summary of their reason for designation.

- 8.22. Examples of areas identified as important open spaces are where the land is a focal point in the street scene, provides the setting for a landmark building, such as a church, or forms a landscaped edge to the built up area of a settlement.
- 8.23. It should be noted that a number of the Locally Important Open spaces are subject to other planning policy or environmental constraints which may act to preclude them from development (i.e. playing pitches, heritage assets and land at high risk of flooding). Policy LAN4 must therefore be applied in the context of these other policies and constraints.
- 8.24. Where a proposal includes the loss of Locally Important Open Spaces opportunities will be sought for compensatory provision where possible. The replacement should be of similar type and use of the space being lost and should be provided as close to the original space as possible. The ability for a development to provide satisfactory compensation may be a factor in weighing the harm of the development against the loss of the open space.
- 8.25. Proposals involving the loss of Locally Important Open Spaces should also have regard to Policy RCN1 of this plan where the open space also performs a role as outdoor play space.

Policy LAN5 Local Green Spaces

Local Green Spaces will be protected from development unless the development proposed would clearly enhance the area for the purpose it was designated and is demonstrably supported by the local community. All other forms of development will not be permitted unless there are very special circumstances where the public benefits of the development proposed would outweigh the harm that would be caused to the Local Green Space.

Reasoned justification

- 8.26. The following sites, as identified on the Policies Map, are designated as Local Green Space in their respective Neighbourhood Plans:
 - Freeman Field, Gotherington (Gotherington Neighbourhood Plan)
 - The Dell and land between the River Isbourne and the B4632, Winchcombe (Winchcombe and Sudeley Neighbourhood Plan)
 - Community allotments, Alderton (Alderton Neighbourhood Development Plan)
 - Children's play area, Millennium Copse and playing fields, Alderton (Alderton Neighbourhood Development Plan)
 - Area around the war memorial, St Margaret's Road, Alderton (Alderton Neighbourhood Development Plan)

- 8.27. Further Local Green Spaces may be identified in Neighbourhood Plans providing they meet the relevant criteria within the National Planning Policy Framework.
- 8.28. The assessment of harm to Local Green Spaces requires consideration of the reasons for the designation of the site within the relevant Neighbourhood Plan.

Policy NAT1 Biodiversity, Geodiversity and Important Natural Features

Development proposals that will conserve, and where possible restore and/or enhance, biodiversity will be permitted.

Proposals will, where applicable, be required to deliver a biodiversity net gain across local and landscape scales, including designing wildlife into development proposals, the connection of sites and large-scale habitat restoration, enhancement and habitat re-creation. Locally defined ecological networks will be the primary focus for landscape scale net gain delivery.

Proposals that are likely to have a significant effect on an internationally designated habitats site (either alone or in combination with other plans or projects) will not be permitted unless a Habitats Regulations Assessment has concluded that the proposal will not adversely affect the integrity of the habitats site.

Development likely to result in the loss, deterioration or harm to features, habitats or species of importance to biodiversity, environmental quality or geological conservation, either directly or indirectly, will not be permitted unless:

- a) the need for, and benefits of the development clearly outweigh its likely impact on the local environment, or the nature conservation value or scientific interest of the site;
- b) it can be demonstrated that the development could not reasonably be located on an alternative site with less harmful impacts; and
- c) measures can be provided (and secured through planning conditions or legal agreements), that would avoid, mitigate against or, as a last resort, compensate for the adverse effects likely to result from development.

The level of protection and mitigation should be proportionate to the status of the feature, habitat or species and its importance individually and as part of a wider network.

Reasoned Justification

- 8.29. Development proposals where the primary objective is to conserve or enhance biodiversity will be encouraged. Where there are opportunities for enhancements which benefit nature conservation and biodiversity, appropriate measures to secure them will be sought through new development.
- 8.30. Paragraph 170 of the NPPF advises that planning policies should contribute to and enhance the natural and local environment by (inter alia) minimising impacts on and providing net gains for

biodiversity. Paragraph 174 advises that, to protect and enhance biodiversity, plans should (inter alia) identify and pursue opportunities for securing measurable net gains for biodiversity.

- 8.31. The Council is mindful of the Government's intention to make biodiversity net gain a mandatory requirement for new development (DEFRA Net Gain Consultation proposals, December 2018) Policy NAT1 should be interpreted and applied in the context of these emerging proposals and any resulting new national planning policy requirement for mandatory biodiversity net gain. All proposals will be required to deliver a net gain except for those specifically excluded in national policy and guidance.
- 8.32. Providing net gains in biodiversity is possible for all development proposals from a single house to larger, strategic scale development by measures such as:
- incorporating bird and bat boxes into the fabric of buildings;
 - using native trees, shrubs and pollinator friendly planting in landscaping schemes (in keeping with the landscape character area);
 - establishing areas of wildflower meadows, woodland and community orchards within open space, landscaping and other areas adjacent to nearby areas of existing wildlife value;
 - designing in green roofs or walls;
 - prioritising the integration of 'green' sustainable drainage systems (SuDS) to benefit wildlife;
 - restoring connections for wildlife (e.g. hedgerows) and re-moving barriers to movement (e.g. river culverts); and
 - enhancing, restoring or recreating priority habitat
- 8.33. Simple measures can also be put in place to avoid creating additional barriers for wildlife, such as designing in gaps in garden fences and joining up landscaped areas with open spaces and habitat areas to facilitate movement for wildlife.
- 8.34. Reference is made at Policy NAT4 to Green Infrastructure being designed in accordance with 'Building with Nature' Standards. Achieving biodiversity net gain will be closely linked with the provision of high quality Green Infrastructure, with particular reference to Building with Nature wildlife standards. Further details on this are set out at Policy NAT3.
- 8.35. The features, habitats and species of importance to environmental quality, biodiversity and geological conservation considered in relation to points a) to c) of Policy NAT1 will include:
- Sites of Special Scientific Interest (SSSIs);
 - legally protected species;
 - Local Sites, including Local Wildlife Sites, Regionally Important Geological/geomorphological sites and any new Local Nature Reserves;
 - species or habitats of principal importance recognised in the Biodiversity Action Plan or listed under Section 41 of the Natural Environment and Rural Communities Act 2006 (priority habitats and species);

- trees, woodlands, and hedgerows (where they are considered to be of sufficient value), ancient woodland (including semi-natural and replanted woodland), aged and veteran trees and historic orchards; and
- ponds, where these make an important contribution to the quality of the environment and its biodiversity resource

8.36. There is also a wide range of locally important natural heritage assets, species and habitats across the Borough that do not benefit from statutory protection but still make an important contribution to the biodiversity of the area and the character of the environment. Their retention and preservation will be sought and proposals to conserve them will be supported.

8.37. Development that would cause significant harm to biodiversity, which cannot be mitigated or (as a last resort) adequately compensated for, will be refused.

8.38. The internationally designated habitat sites in Tewkesbury Borough are the Cotswold Beechwoods Special Area of Conservation (SAC) in Brockworth and Great Witcombe parishes, and the Dixton Wood SAC in Alderton parish. Development that has potential to have a likely significant effect on these internationally designated sites (either alone or in combination with other plans and projects) will be subject to a Habitats Regulations Assessment. The provisions of NAT1 in relation to internationally designated nature conservation sites relate also to possible Special Areas of Conservation, potential Special Protection Areas (SPA), and sites identified or acquired for compensatory measures for adverse effects on these sites or on designated European sites. Furthermore, parts of the Borough are located within close proximity of the Severn Estuary SAC, SPA and Ramsar Site designations and may involve 'functionally linked land' associated with designated species such as the SPA's wintering and passage wild birds and the SAC and Ramsar's migratory fish. The effects of new development on the Severn Estuary SAC, SPA and Ramsar Site designations should therefore be considered where appropriate.

8.39. The Cotswold Beechwoods SAC is at risk from increasing recreational pressure and traffic emissions arising from new development in the area. Mitigation will be required to address the potential for adverse effects and ensure that housing development in the Borough meets the requirements of the Habitats Regulations 2017. Due to the cross border nature of recreation pressure and the in combination and cumulative nature of effects, a joint approach will be needed by the relevant Local Planning Authorities. As such a visitor survey has been undertaken to provide key evidence for understanding recreational pressures. This survey will inform the development of a mitigation strategy that will identify necessary mitigation measures. The Council awaits the outcome of this further work and will continue to work with neighbouring authorities and Natural England to protect the SAC.

8.40. The Borough also contains a substantial number of Sites of Special Scientific Interest (SSSI). These sites are given statutory protection under the Wildlife and Countryside Act 1981 as amended; their interest is of national importance.

8.41. The nature of sites vary widely from those of geological interest e.g. Cotswold quarries, to small sites containing rare plant species. The advice of Natural England will be sought on the likely effects

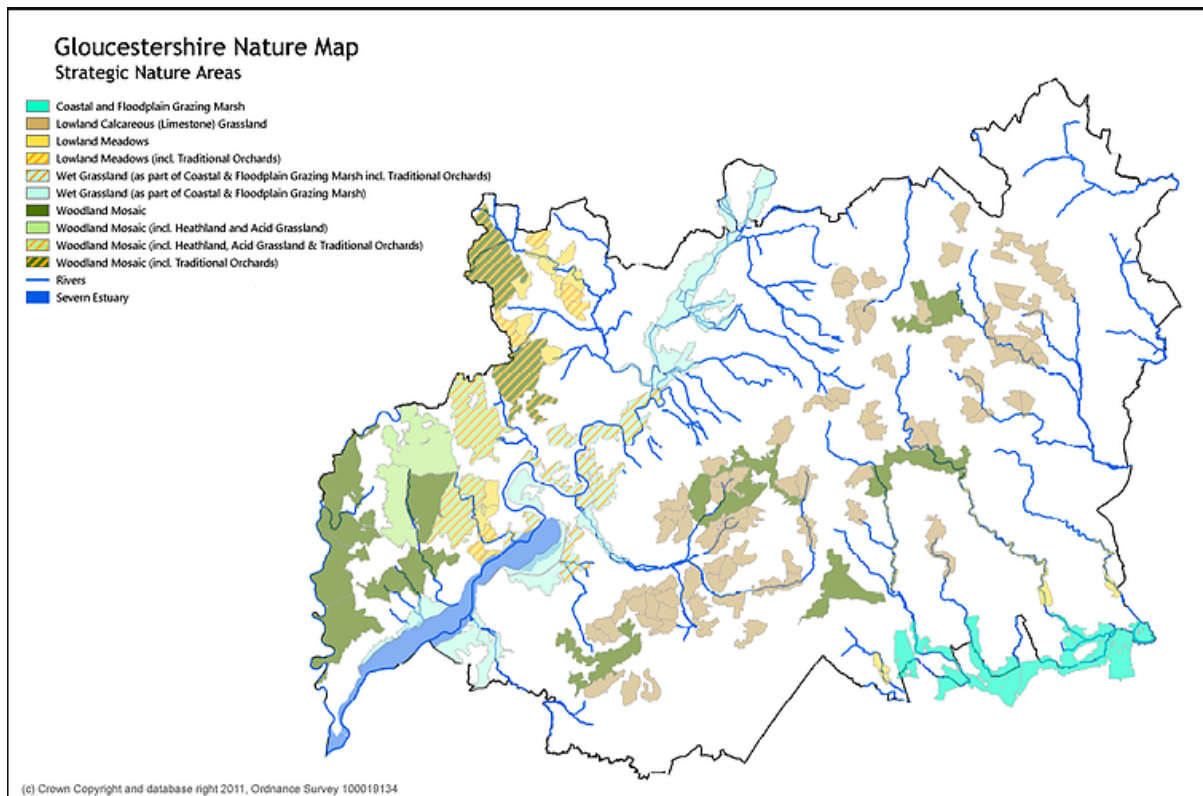
of development on or adjacent to SSSI's, in the circumstances outlined in S28(l) of the Wildlife and Countryside Act 1981. Policy NAT1 will apply to any further nationally designated sites as designated in the future.

- 8.42. The location and details of the SACs and SSSIs in the Borough can be found at <http://www.natureonthemap.naturalengland.org.uk/MagicMap.aspx>.
- 8.43. There are also a considerable number of sites within the Borough of regional or local nature conservation or geological/geomorphological importance, including those designated as 'Local Wildlife Sites', 'Local Nature Reserves' or 'Local Geological Sites'. The details of these are provided at Appendix 3. These local sites encompass a very wide range of habitats, species and features which warrant protection in order to safeguard biodiversity and the environmental quality of the area. Policy NAT1 will also give protection to any further Local Wildlife Sites which may be identified by Gloucestershire Wildlife Trust in the future and any new Regionally Important Geological Sites identified by the Geology Trusts. It also gives protection to any Local Nature Reserves created by the Borough Council or the Town and Parish Councils within the Borough.
- 8.44. Priority species and habitats cover a wide range of species and semi-natural habitat types, and were those that were identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan. Where legally protected species, priority species or priority habitat are or are likely to be present on a proposed development site, an ecological survey will be required in order to determine the extent and value of the feature. The indicative location of Priority Habitats within the Borough can be identified using DEFRA's Magic Map Service at <http://www.natureonthemap.naturalengland.org.uk/MagicMap.aspx>. The known presence of priority habitats and species for a given area can be obtained from the Gloucestershire Centre for Environmental Records (GCER) <https://www.gcer.co.uk/>.
- 8.45. A number of the priority habitats within Tewkesbury Borough form part of Strategic Nature Areas on the Gloucestershire Nature Map produced by the Local Nature Partnership (Figure ?). These identify landscape-scale areas where there is opportunity for both the maintenance and, crucially, the restoration/expansion of Priority Habitat. The aim of Strategic Nature Areas is to highlight and thus provide the opportunity to link existing areas rich in wildlife and to improve a percentage of intervening land for biodiversity. In accordance with Policy SD9 of the JCS and the requirements of NAT1 the Borough Council will seek to secure improvements to Strategic Nature Areas through new development wherever possible and appropriate to do so. A strategically important ecological network for Gloucestershire is also being developed by the Local Nature Partnership and this will be likely to be heavily based on the Strategic Nature Areas, strategically important green infrastructure areas as well as main rivers and other watercourses. A Gloucestershire ecological network map will be produced which will show existing priority habitat and restoration zones through which habitat management, restoration or creation could improve connectivity.
- 8.46. The term 'environmental quality' for the purposes of this policy refers to both the built and natural environments and encompasses the landscape, townscape and amenity of the relevant area. It should be noted that landscape features may also be subject to other statutory provisions, for example Tree Preservation Orders and the Hedgerow Regulations. Policy NAT1 automatically

applies to trees protected by a Tree Preservation Order or located within a Conservation Area; and hedgerows that meet the “important hedgerow” criteria in the Hedgerow Regulations. Other non-protected landscape features (including trees, hedgerows and woodland) will however be subject to the requirements of the policy where they are of sufficient value (by virtue of their contribution to the quality of the local environment) to warrant their protection.

- 8.47. Where trees within or adjacent to a site could be affected by development, a full tree survey and arboricultural impact assessment to BS 5837 will be required as part of the planning application. This needs to be carried out at a sufficiently early stage to determine the value of trees and inform the design of the development. The implementation of any protective measures it identifies will be secured by the use of planning conditions.
- 8.48. This policy does not prevent the appropriate management of trees and woodlands or the removal of low value trees, hedgerows and other landscape features that do not make an important contribution to the quality of the local environment.
- 8.49. In some cases, the loss of trees and hedgerows may be unavoidable and outweighed by the benefits of the development. In such cases compensatory planting will be required on or near the site. Appropriate tree species should be selected and arrangements made for the long-term management of the new trees. Proposals involving new and replacement landscape features should also, where appropriate, have regard to the relevant landscape character types within the Gloucestershire Landscape Character Assessment and the Cotswolds AONB Landscape Character Assessment.
- 8.50. Similarly, in some cases harm to features, habitats and species of importance to biodiversity and geological conservation cannot be avoided and the public benefits of the proposal may outweigh the importance of the biodiversity/geodiversity interest involved. In all such cases adequate mitigation will be required within the development site where possible, however where this is not feasible it may be more appropriate to deliver offsite measures through legal agreements and landscape scale projects. Appropriate mitigation/compensatory measures will be expected to deliver a biodiversity net gain. Mitigation/compensatory measures should be delivered as close to the development site as possible to avoid the degradation of local ecological networks or ‘ecosystem services’.
- 8.51. Proposals that are likely to result in a significant effect on European Protected Species will need to satisfy the requirements of the Habitat Regulations in addition to the requirements of NAT1.

Figure ? – Strategic Nature Areas



Source: Gloucestershire Local Nature Partnership <https://www.gloucestershirenature.org.uk/>

Policy NAT2 The Water Environment

In pursuance of the objectives of the Water Framework Directive the Council will, where practical, seek appropriate opportunities offered by new development proposals to recreate more natural conditions and new habitat along watercourses, for example by requiring; the de-culverting, restoration or re-profiling of watercourses; the removal of barriers to fish migration; or the integration of watercourses with wider green/blue infrastructure networks.

Reasoned justification

- 8.52. There are a number of watercourses within the Borough that have been subject to past modification through culverting, canalisation and straightening. Such modifications can have a detrimental impact on the environment due to the loss of environmental features associated with the watercourse. The continuity of the river corridor is broken, adversely affecting the landscape and ecological value of the watercourse and inhibiting the migration of some species. Culverting in particular can result in the removal of species and river features such as earth banks with associated vegetation, invertebrate communities and fish.
- 8.53. The Water Framework Directive (WFD) establishes a legal framework for the protection, improvement and sustainable use of water bodies across Europe and applies to all surface water bodies, including rivers, streams, brooks, lakes, estuaries and canals, coastal waters out to one mile

from low water, and groundwater bodies. One of the objectives of the WFD is to conserve aquatic ecosystems, habitats and species. The WFD aims to achieve at least 'good' status for all waterbodies by 2015 however this has not been possible. The Environment Agency is therefore aiming to achieve good status in at least 60% of waters by 2021 and in as many waters as possible by 2027. Surface waterbody status is determined by its chemical and ecological status, with the former being based on chemical quality and concentrations for specific water pollutants, and the latter based on its biological elements such as fish and insect life and hydromorphological and physio-chemical elements such as phosphorus, temperature, dissolved oxygen and pH.

- 8.54. Whilst most, if not all, of the Borough's waterbodies are already achieving good chemical status as of 2016, the ecological status of its waterbodies is in many cases only moderate with some being of poor. The restoration and recreation of more natural conditions along modified watercourses will provide a wider range of habitats, not only within the watercourse itself but also on the banks and in the floodplain. This will make an important contribution towards waterbodies achieving good ecological status and therefore good overall status.

Policy NAT3 – Green Infrastructure: Building with Nature

Development must contribute, where appropriate to do so and at a scale commensurate to the proposal, towards the provision, protection and enhancement of the wider green infrastructure network.

All proposals for green infrastructure will be expected to be designed in accordance with the 'Building with Nature' standards.

Reasoned Justification

- 8.55. JCS Policy INF3 provides the strategic guidance on what is expected from new development in regard to green infrastructure provision. All development should contribute towards the provision, improvement and maintenance of the green infrastructure network across the Borough where appropriate to do so. All development can potentially make a positive impact on the green infrastructure network and proposals will, where appropriate, be expected to make such provision at a scale that is commensurate with the development.
- 8.56. In 2017 a partnership between the Gloucestershire Wildlife Trust and the University of the West of England launched the 'Building with Nature' scheme. Building with Nature introduces a set of best practice standards for the development of green infrastructure, being together existing guidance to recognise the importance of high quality green infrastructure at all stages of the development process. The standards help to define what good green infrastructure and set out the basic approach to providing it through new development.
- 8.57. To achieve high quality infrastructure provision, and to ensure that best practice is followed, the Borough Council will expect developers to utilise these standards to inform development from the

outset. Compliance and the design process should be demonstrated through Design and Access Statements and/or any site-based green infrastructure strategy.

- 8.58. Developers are referred to the latest Building with Nature User Guide available on the Council's website <https://www.tewkesbury.gov.uk/planning-policy-evidence-base>

Policy NAT4 – Tewkesbury Nature Reserve

The Borough Council will support proposals to enhance the landscape and nature conservation interest of land to the east of Priors Park as defined on the Policies Map, whilst increasing access for recreational and educational use. All such proposals must however be designed and constructed to:

- remain operational and safe for users in times of flood;
- result in no net loss of floodplain storage;
- not impede water flows and not increase flood risk elsewhere.

Reasoned justification

- 8.59. Tewkesbury Nature Reserve is a newly established nature reserve managed by a community-run organisation relying primarily on the efforts of volunteers. The vision for the reserve is to create a community nature reserve, combining a haven for wildlife with a place where people can connect with nature.
- 8.60. The Borough Council will support the Tewkesbury Nature Reserve management team in its continued efforts to achieve the vision for the reserve and, in accordance with Policy NAT1, development proposals where the primary objective is to conserve, restore or enhance biodiversity on the reserve will normally be permitted.
- 8.61. The area is however assessed within the Level 1 Strategic Flood Risk Assessment (Halcrow, 2008) to be within the Functional floodplain of the River Swilgate (Flood Zone 3b). This zone comprises land where water has to flow or be stored in times of flood. This acts to prevent most forms of development from taking place except for Water Compatible development (includes amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms) and essential infrastructure (subject to it passing the Exception Test). Whilst this would still allow development to take place where it relates to nature conservation/biodiversity or recreation, the PPG still advises that any proposals for water compatible development must be designed and constructed to remain operational and safe for users in times of flood; result in no net loss of floodplain storage; and not impede water flows and not increase flood risk elsewhere.

- 8.62. The nature reserve also forms part of a Priority Habitat (Coastal and Floodplain Grazing Marsh) as identified in the UK Biodiversity Action Plan. Thus, in accordance with Policy NAT1, any development likely to result in the loss, deterioration or harm to its features and habitats will only be permitted where it achieves the criteria set out in the policy.

Policy NAT5 – Cotswold Beechwoods

Development will not be permitted where it would be likely to lead directly or indirectly to an adverse effect upon the integrity of the Cotswold Beechwoods Special Area of Conservation (SAC) (alone or in combination), and the effects cannot be mitigated.

In order to retain the integrity of the SAC all development that leads to a net increase in dwellings will be required to mitigate any adverse effects of increased recreational pressure. Any proposals that would lead to an adverse effect must contribute towards mitigation specified in the SAC mitigation and implementation strategy or through a bespoke Habitats Regulations Assessment.

Development which is likely to generate road traffic emissions to air which are capable of affecting the SAC will be screened against the Habitats Regulations Assessment Framework in line with Natural England's guidance 'Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001)'

Reasoned Justification

It is recognised that an increase in housing growth in the area surrounding the Cotswolds Beechwoods Special Area of Conservation (SAC) has the potential to lead to an increase in the recreational pressure resulting from people visiting the site. Due to the cross-boundary nature of the Beechwoods SAC and the distances that visitors are likely to travel to reach the site it is apparent that, in order to mitigate the impact of recreation pressure arising from new development, a joint approach amongst the Gloucestershire authorities is required.

This joint working is already in progress and the Gloucestershire authorities have commissioned a visitor survey, carried out during summer 2019, to provide an evidence base to understand the recreational pressures that the SAC is subject to. This survey will ultimately lead to the production of a mitigation strategy to identify what measures can be put in place to mitigate the impact of new development and ensure the protection of the site. This evidence may also assist with determining when a development may be likely to have an adverse impact depending on factors such as the distance from the SAC. The mitigation strategy is expected to be available in early 2020.

In order to comply with the Habitats Regulations 2017, and specifically to address the uncertainty regarding the effects of recreation pressure from new housing in Tewkesbury Borough on the Beechwoods SAC, it is important to provide a policy approach to ensure effective mitigation. The above policy requires that, where residential development is likely to have an adverse impact on the SAC through increased recreational pressure, that these impacts are mitigated. Mitigation should be

provided as identified through the SAC mitigation strategy or through a bespoke Habitats Regulation Assessment for the development.

Appropriate mitigation measures may include: financial contributions towards habitat management; access management and visitor infrastructure; publicity, education and awareness raising; the provision of suitable open and green space within development sites where this can be accommodated, and where it cannot, by contributions to off-site alternative green space. Any mitigation measures should take into account and integrate with adopted JCS policy INF3 (Green infrastructure) and the associated JCS Green Infrastructure Strategy.

The Cotswold Beechwoods SAC lies within 200m of the A46. The 'air pollution information service' (APIS) website (www.apis.ac.uk) indicates that the SAC currently exceeds its critical loads and levels for nutrient nitrogen. Natural England have therefore advised that development proposals that may generate additional traffic along this route should take into account guidance note NEA001. This will ensure that the latest available up to date information in line with the Habitats Regulations 2017 are referenced and information is consistent with the Wealden Judgement case law dealing with in combination effects.

Policy ENV1 Development near sewage treatment works

An Odour Monitoring Zone is defined on the Policies Map around the sewage treatment at Hayden (Boddington and Staverton Parishes), Tewkesbury, Winchcombe and Brockhampton (Bishop's Cleeve Parish).

Development which is likely to be significantly affected by odours will not be permitted within the Odour Monitoring Zone unless it can be demonstrated, through an Odour Impact Assessment, that the health and quality of life of its occupants would not be adversely affected.

Reasoned Justification

- 8.63. Due to the potential for odour from sewage treatment (either the works or fields used for sludge disposal) it is advisable that a zone should be kept free of sensitive development around certain sewage works where the effluent treated is equivalent to that of a population greater than 2,000 persons.
- 8.64. Development which is not likely to be acceptable may include dwellings, schools, hospitals, residential institutions and any other uses where people's health and quality of life would be adversely affected. For smaller treatment works within the borough, as part of the normal consultation procedure on planning applications, Severn Trent will advise where development may not be appropriate in close proximity to the works.
- 8.65. It is possible in future that odour monitoring zones may alter as a result of changing technologies or operations at current sewage treatment work sites. The Council will consider further evidence on the impact of sewage treatment works where appropriate and work closely with Environment

Agency, Severn Trent and other expert bodies to determine the impact on any existing and future development.

Policy ENV2 Flood Risk and Water Management

In order to avoid and manage the risk of flooding to and from new development in the Borough, in addition to the requirements of the National Planning Policy Framework and the Joint Core Strategy the Council will apply the following principles:

- Proposals (including surface water drainage schemes) should be designed to appropriate, locally specific allowances for climate change for peak river flood flows and rainfall intensity
- Opportunities to reduce the existing risk of flooding in the Borough will be sought, including requiring developments to provide flood storage on sites located within the headwaters of the Borough's watercourses
- All proposals will be expected to incorporate sustainable drainage systems where appropriate and proportionate to the scale and nature of development proposed
- Proposals must demonstrate that development is designed to use and manage water efficiently, including rainwater harvesting and greywater recycling where possible
- Surface water drainage proposals should, where appropriate, achieve significant betterment on existing discharge rates for all corresponding storm events
- Sustainable drainage systems should be designed to achieve multifunctional benefits. Priority should be given to green/soft solutions and the integration of sustainable drainage systems with green infrastructure and street networks
- Arrangements for the long term maintenance of sustainable drainage systems must be in place to the Council's satisfaction

Reasoned Justification

- 8.66. Tewkesbury Borough is heavily influenced by the Severn and Avon Rivers. These rivers can pose a major flood risk, especially in the vicinity where the two watercourses meet at Tewkesbury town. A considerable amount of land to the western side of the Borough comprises the functional flood plain and the majority of the Borough area ultimately drains into the Severn. Flooding from surface water is also a problem as drainage is closely linked to river levels, with the largely impermeable geology and generally gentle topography of the Borough exacerbating flood risk.
- 8.67. Tewkesbury Borough has suffered from numerous severe flooding events in its history, one of the most notable of which was in the summer of 2007. The effects of global climate change are likely to result in more occurrences of extreme weather events and resultant flooding in the future. With the need for significant levels of new housing and employment development within the Borough, as identified through the Joint Core Strategy, it is imperative that issues associated with water management are identified and subsequently tackled if existing problems are not to be made worse, along with the associated negative social, environmental and economic impacts.

- 8.68. The JCS (Policy INF2) provides an overarching policy to address the impacts of flooding and this is supplemented at a local level by the Council's Flood and Water Management SPD (FWMSPD). However, given the significant risk of flooding and planned levels of growth in the Borough a locally specific and detailed policy on flood risk and water management is required which, together with the SPD, will ensure that development is sustainable and responds to local circumstances. Policy ENV2 deliberately omits reference to core policy requirements including the sequential and exception tests as these are sufficiently covered by the JCS and NPPF. Instead it focuses on more detailed, locally specific matters with the aim of improving the quality and sustainability of development.
- 8.69. The NPPF requires local plans to apply a sequential, risk based approach to the location of development – taking into account the current and future impacts of climate change, and Policy INF2 of the JCS requires Flood Risk Assessments to incorporate the latest available updates to modelling and climate change data. Taking account of the uncertainties associated with climate change, a precautionary approach is deemed to be the best option and to design from the outset to cope with the highest estimates of climate change. As such, for more vulnerable developments (such as housing) the Council will seek to apply the most up to date 'upper end' climate change allowances to peak river flows (for the Severn River Basin) and peak rainfall intensity. Climate change allowances should be based on the lifetime of the development. Applicants are directed to the Council's FWMSPD for further guidance on this matter.
- 8.70. Given the severity and sensitivity of flooding from all sources in Tewkesbury Borough, and the potential impact of cumulative development, it is considered that all forms of development should incorporate sustainable drainage techniques. A proportionate approach will however be taken according to the scale and nature of the development proposed. For example, it is appreciated that the opportunity for sustainable drainage systems may be more limited in householder and other minor developments, although these could still employ techniques such as permeable surfacing, water butts, rain gardens, soakaways, green roofs and rainwater harvesting.
- 8.71. As set out in the FWMSPD it is considered necessary to require all applications except those proposing minor development⁴ to be accompanied by an appropriate level of information in relation to flooding. This information shall be submitted in the form of a Water Management Statement (WMS), which will be a validation requirement for such schemes. Applicants are directed to the Council's FWMSPD for further guidance on this matter.

⁴ The term 'minor development' for the purposes of ENV2 is the same as that defined in the Planning Practice Guidance and means:

- minor non-residential extensions: industrial/commercial/leisure etc. extensions with a footprint less than 250 square metres.
- alterations: development that does not increase the size of buildings e.g. alterations to external appearance
- householder development: For example; sheds, garages, games rooms etc. within the curtilage of the existing dwelling, in addition to physical extensions to the existing dwelling itself. This definition excludes any proposed development that would create a separate dwelling within the curtilage of the existing dwelling e.g. subdivision of houses into flats

- 8.72. Again, given the severity and sensitivity of flooding from all sources in Tewkesbury Borough, and the potential impact of cumulative development, the Council will (where appropriate) expect sustainable drainage systems to achieve betterment on existing discharge rates. The Council's approach to achieving betterment is set out in the FWMSPD.
- 8.73. Sustainable drainage systems can offer multifunctional benefits including improved water quality and habitat creation along with health and wellbeing and amenity benefits through their integration with green infrastructure.
- 8.74. The Council will require, through conditions attached to planning permissions, that development is not brought in to use/occupied until a SuDS management and maintenance plan for the lifetime of the development is submitted for approval. This should include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime.

Policy ENV3 Solar Farms

In considering proposals for large scale, stand alone solar photovoltaic installations priority will be given to sites on previously developed land or non-agricultural land. Where the proposed use of agricultural land is shown to be necessary priority will be given to poorer quality agricultural land. Proposals located on the best and most versatile agricultural land will only be permitted where there is compelling evidence to justify its use. Proposals on agricultural land should allow for the continued agricultural use of the site and/or encourage biodiversity improvements around arrays. In all cases proposals must:

1. Have no unacceptable impact on the landscape and the visual amenity of the locality, paying particular regard to Areas of Outstanding Natural Beauty, Special Landscape Areas and the Landscape Protection Zone.
2. Ensure that all ancillary apparatus including electronic switchgear, inverters, transfer stations, substations, fencing and cctv equipment are designed and located to have a minimal impact on the landscape and the visual amenity of the area.
3. Have regard to the cumulative impact of the development on the area when viewed together with other permitted and operational solar installations in the locality.
4. Respect the historic environment with particular regard to the setting of heritage assets in the area.
5. Enable the conservation or enhancement of habitats and biodiversity features within the site and its surroundings.

The Council will impose conditions on all planning permissions for large scale, stand alone solar photovoltaic installations to secure the decommissioning and appropriate restoration of the site.

Reasoned justification

- 8.75. The Council is committed to meeting the challenges of climate change and recognises the important contribution made by solar farms towards achieving the Government's targets for renewable energy generation. Large scale solar farms can however result in a detrimental impact on the Borough's landscape and natural resources if not carefully located and designed.
- 8.76. The Council will require applicants for proposals involving agricultural land to demonstrate that there are no reasonable alternative sites on previously developed land in the Borough. The Council's Brownfield Register provides a key source of information for identifying brownfield development opportunities. Where there are shown to be no suitable alternative sites on previously developed land the Council will allow in principle the development of agricultural land giving priority to poorer quality land. Proposals located on the best and most versatile agricultural land will only be permitted where there is compelling evidence to justify its use. This must include evidence to demonstrate that there are no suitable alternative sites with a lower agricultural land classification, consideration of the quality of the land in question and the benefits of retaining it in productive agricultural use, and consideration of the benefits of the proposal including its contribution towards increasing the supply of renewable energy and meeting national targets. The Council will require applications on Grades 1, 2 and 3 agricultural land to be accompanied by an Agricultural Land Classification Survey.
- 8.77. Applicants will be expected to provide details in relation to the siting and external appearance of all ancillary apparatus including electronic switchgear, inverters, transfer stations, substations, fencing and cctv equipment as part of their application submission.
- 8.78. Following the cessation of electricity generation by solar photovoltaic facilities the Council will require that all solar panels, frames, foundations, ancillary apparatus and all associated structures and fencing are dismantled and removed from the site. The site shall subsequently be restored in accordance with an approved restoration scheme. The Council will impose conditions on all planning permissions for large scale, stand alone solar photovoltaic installations to secure the decommissioning and appropriate restoration of the site.
- 8.79. This policy must be read together with Policy INF5 of the JCS (Renewable Energy/Low Carbon Energy Development) which provides additional considerations in respect of renewable energy proposals.
- 8.80. Policy ENV3 only applies to large scale, ground mounted solar photovoltaic installations. The Council will regard proposals with a capacity of more than 50kW to be large scale and therefore subject to the policy. Although policy ENV3 does not apply to proposals with a capacity of 50kW or less, or to solar panels mounted on buildings and domestic microgeneration proposals, many of its requirements will still be of relevance having regard to other policies within the wider Development Plan, in particular policies INF5, SD6 and SD14 of the Joint Core Strategy.

9. Communities, Health & Recreation

Introduction

- 9.1. The Tewkesbury Borough Plan has a key role to play in shaping healthy environments as well as enabling people to make healthier choices about exercise, local services, travel, food, nature and leisure. The issue of health is broad and is influenced by all planning issues across the Borough Plan. In particular, the plan's policies of housing, design, green infrastructure and transport all have a major impact on quality of life in regard to health. Joint Core Strategy Policy SD14 – Health and Environmental Quality provides important guidance to ensure that the quality of life for people in the Borough is protected and improved. The Borough Plan will additionally promote healthy environments by implementing the policies in this plan to ensure that new development has the most positive contribution to health as possible.
- 9.2. Access to community and recreational facilities is a key factor in providing a good quality of life and adequate services to meet the needs of people in the Borough. The Joint Core Strategy provides guidance in regard to social and community facilities through Policy INF4 – Social and Community Infrastructure which sets out the general approach to the provision, protection and location of such facilities. Further guidance on the role of new development in contributing towards this included through policies INF6 – Infrastructure Delivery and INF7 – Developer Contributions. The Borough Plan seeks to set out further, more detailed, requirements for the provision and protection of these important assets.

Policy HEA1 Healthy & Active Communities

To promote healthy active communities new major development should be designed in accordance with 'Active Design' principles.

As a minimum, all major development will be required to demonstrate that the potential impacts on health have been considered and addressed through a Design and Access Statement to a level proportionate to the scale of the development. Where there is expected to be a significant impact on the health or wellbeing the Borough Council will require a Health Impact Assessment to be undertaken. For developments of 100 or more units and non-residential developments of 10,000m² or more will be required to undertake and submit a Health Impact Assessment screening to determine the need for a full assessment.

Where significant impacts are identified, measures to mitigate the adverse impact of the development will be provided and/or secured by planning obligations

Reasoned Justification

- 9.3. New developments will be expected to have a positive contribution to health and wellbeing and promote active communities. This contribution covers a range of issues that are integral to the design and planning of all proposals. Many of these issues are dealt with through other policies in

both the Joint Core Strategy and the Borough Plan, such as design, transport and infrastructure policies. In general, new development will be expected to demonstrate how they will contribute to the creation and maintenance of healthy environments and facilitate healthy and active lifestyles. This will include:

- Creating an inclusive built and natural environment that is suitable for all members of society;
- Well-designed developments that are attractive and safe;
- Providing access to sufficient open space and recreation facilities;
- Encouraging active travel, including walking and cycling;
- Providing houses that meet the needs of Borough and provide sufficient internal and external space;
- Preventing negative impacts on residential amenity and wider public safety from noise, ground instability, ground and water contamination, vibration and air quality;
- Promoting social cohesion between existing and future residents/occupies;
- Providing good access for all to key services, including health and social care facilities;
- Promoting allotments and gardens for exercise, recreation and for healthy locally produced food.

9.4. Sport England, with support from Public Health England, published their Active Design guidance in October 2015. The guidance identifies 10 key principles of active design that can be incorporated into new developments. To promote active lifestyles the Borough Council expect that proposals take into account of the principles and use them to help inform the design and layout of new development. The principles can be applied at scales of development, however, it is recognised that not all will be relevant or appropriate in all scenarios, particularly for smaller-scale proposals. However, achieving as many of the design principles as possible will make a valuable contribution towards healthy lifestyles.

9.5. All major development proposals are required to consider their potential impacts on health. As a minimum this will need to be demonstrated through a design and access statement submitted with the proposal. The information required should be proportionate to the size of development proposed but should include consideration of how proposals meet the JCS and TBP policies relating to health issues.

9.6. Where it is expected that there would be a significant impact on health then the Borough Council will require that a Health Impact Assessment (HIA) is undertaken and submitted. The HIA must demonstrate how health impacts of have been properly considered when preparing, evaluating and determining development proposals, including how any negative impacts are to be mitigated. The guidance provided in Health Impact Assessment Tools paper published by the Department for Health in 2010 is a good starting point for undertaking an assessment.

9.7. For larger scale sites it is recommended that a screening assessment should be undertaken to determine whether significant impacts are likely. Early engagement with the Director of Public Health, local Clinical Commission Groups and NHS England is encouraged. For sites involving

developments that that are over 100 dwellings or 10,000m2 of non-residential development the Borough Council will expect a screening assessment to be undertaken to demonstrate the need for a HIA.

Policy RCN1 Public Outdoor Space, Sports Pitch and Sports Facility Provision

Proposals for new residential development shall provide appropriate public outdoor space, sports pitches and built sports facilities to meet the needs of local communities. Provision should be informed by the most up to date evidence, including the council's Social, Sport and Open Spaces Study and its associated Developer Contributions Toolkit.

The provision of new facilities resulting from new development must be accompanied by an appropriate management plan and adequate provision for on-going maintenance.

The provision or improvement of any new facilities that would be in private ownership, including as part of an educational institution, that are required to mitigate the development, will need to be fully accessible to the public if it is to address the needs of the local community.

Public outdoor spaces, sports pitches and built sports facilities will be protected and their loss, either in total or in part, will generally be resisted. Proposals for any loss may only be acceptable where either:

1. It is demonstrated, through a robust and up to date assessment, that there is an excess in provision in the local area, there is no current or future demand for such provision and there would be no resulting shortfall; or
2. The space/facility being lost can be suitably replaced by alternative provision of an equivalent or better quality and quantity in an accessible location; or
3. The proposal is ancillary development to the use of the space/facility which would enhance its facilities and not prejudice its ongoing use; or
4. The proposal affects land that is not suitable or incapable of forming an effective part of the space/facility and its loss would not prejudice the ongoing use of the remainder of the site for that purpose.

Reasoned Justification

9.8. The Borough Council published the Social, Sport and Open Spaces study in 2018 which provides a detailed assessment and strategy for the needs of open space and sport facilities in the area. The study covers the following areas:

- Open spaces
- Playing pitches
- Built sports facilities (including community facilities)
- Social sustainability

- 9.9. In regard to open spaces, this covers a wide range of different facilities and infrastructure that are important for local communities; including: parks and gardens, natural and semi-natural greenspace, amenity greenspace, equipped play areas, allotments and cemeteries.
- 9.10. The study identifies that there is a continuing need for contributions towards open space and sports facilities from new development. This should be done through the identification of any deficit of provision within the locality, both in terms of accessibility and quality; whether a development site is within appropriate accessibility catchment for each type of facility; and whether the enhancement of existing provision is required to provide adequate facilities. Where development is located within an area where open space provision is identified as being sufficient in terms of quantity and accessibility, it may be more suitable to seek contributions for quality improvements to existing sites.
- 9.11. In order to ensure that development is making appropriate contributions to open space and sports facilities, a Developer Contributions Toolkit accompanies the study and provides a tailored and evidence based approach to determining the right level of provision reflecting the findings of the Social, Sport and Open Spaces Study. The toolkit will help to clearly justify the needs arising from a development and how they are to be met and provides separate assessment processes relating to open space, playing pitches and built sports facilities. Developers will be expected to make provision for these facilities in accordance with the processes set out within the toolkit.
- 9.12. In event that the study and toolkit are superseded, then the most up to date evidence base applied by the Borough Council shall be used.
- 9.13. The Borough Council will also seek the protection of existing open spaces and facilities as important assets within the community. There will be a general presumption against the loss of any facilities in part or as a whole to ensure that these important assets remain to serve the local area and no increase in deficiency in provisions occurs. The loss of any facilities will only be acceptable if it can be demonstrated that there is no requirement or demand for it, either at the current time and taking into account any future development or population growth expected in the area. This will need to be demonstrated through a robust and up to date assessment and reflect the Council's latest Social, Sport and Open Spaces study. Where there is still demand for the facility then any loss can only be justified if can be replaced by adequate alternative provision that would continue to meet the needs of the locality to the same level or better, both in terms of quantity, quality and accessibility.

Policy RCN2 New Sports and Recreational Facilities

Support will be given to the provision of recreational facilities, both formal and informal, throughout the plan area. Any new buildings or structures must be strictly ancillary, and must not have any adverse impact on the quality of the environment or result in significant local traffic problems. Any floodlighting must be demonstrated to be essential and to have minimal environmental impact.

In all cases the provision of recreational facilities should not result in:

1. An adverse landscape or environmental impact, with particular regard to the Area of Outstanding Natural Beauty, Special Landscape Areas and the Landscape Protection Zone;
2. an adverse effect on living conditions;
3. the quiet enjoyment of the countryside being prejudiced;
4. significant local traffic problems; and
5. the prevention of access to the countryside by prejudicing existing rights of way without making alternative provision.

Proposals for recreational facilities should be accessible by a choice of means of transport.

The provision of additional outdoor sports pitches will be encouraged throughout the Borough where there is an identifiable need having regard to Policy RCN1, but will be assessed against the above criteria.

Reasoned Justification

- 9.14. Tewkesbury Borough Council is committed to encouraging the introduction of recreational facilities to cater for both formal recreational needs such as sports pitches, play facilities and waterborne activities which have the added benefit of supporting the tourist industry, as well as more informal facilities such as rights of way. Within the rural areas priority will be given to ensuring that there is no adverse impact on the character of the environment.
- 9.15. The provision of sports facilities in inappropriate locations can have a detrimental impact on the local environment both in terms of the landscape and due to increased traffic movements. Tewkesbury Borough Council aims to ensure that new facilities are provided in the most appropriate locations near to the population they aim to serve, which will be an important consideration for new facilities required as a result of new development.
- 9.16. Floodlighting can be a nuisance to adjacent land users and can cause an unnecessary glow in the night sky visible for some distance. A proposal for such lighting must demonstrate how essential it is for the particular project and must be of a design to minimise environmental impact e.g. the orientation of high intensity lighting for golf driving ranges away from homes and roads.
- 9.17. Outdoor sport and recreation can be appropriate uses within the Green Belt, although any associated buildings will be strictly controlled. New buildings in connection with outdoor sport and recreation will only be permitted in very special circumstances and where they are essential for the operation of the sport/recreational activity involved and are designed and sited to have a minimal effect on the openness of the Green Belt.

Policy RCN3 Allotments & Community Gardens

Statutory allotments and community gardens, identified on the Policies Map, will be protected from development which would lead to the loss of plots.

Where, exceptionally, due to other overriding factors development of allotment or garden land is proposed, this will only be permitted subject to provision of replacement facilities of comparable extent within the local area. This provision must include the translocation of the allotment or garden top soil, where appropriate, the provision of water standpipes within 20 metres of each allotment, the relocation of existing greenhouses and other ancillary equipment to the new site where required, and the provision of car parking.

Major development should contribute to the provision for allotments and/or community gardens in line with the Social, Sport and Open Spaces Study and its associated Developer Contributions Toolkit.

Reasoned Justification

- 9.18. Allotments are an important community resource, in terms of their value for food production, environmental quality, and their contribution to local character, health and local social life. Allotments have usually been worked for many years and have developed a high degree of soil fertility. However, this policy also applies to any new allotments that may be subsequently created. It is therefore critical, in those exceptional cases where allotments are to be developed, that the topsoil is moved to the new site and that proper provision is made for the other amenities essential to the working of the allotments. Allotment sites are frequently sited close to the historic centres of settlements and may therefore provide the best located sites for development, particularly where options for development are severely constrained. Development of allotment sites should therefore be seen as an exceptional occurrence when other possible site options have been fully considered and have been found less suitable.
- 9.19. Major developments, as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2010, will be required to contribute to the provision of allotments as part of a package of Green Infrastructure requirements.
- 9.20. The Borough Council published the Social, Sport and Open Spaces study in 2018 which deals with the needs and provision of allotments. The Developer Contributions Toolkit that accompanies the study provides a tailored and evidence based approach to determining the right level of provision. Developers will be expected to make provision for these facilities in accordance with the processes set out within the toolkit. Need should also be established with reference to the Tewkesbury Borough Council and relevant Town and Parish Council waiting lists for allotments and any petitions received under the Small Holdings and Allotments Act 1908.

Policy RCN4 Equine Facilities

Proposals for new equine facilities must be designed and sited where they would not have an adverse effect on the rural character and landscape setting of the area, particularly within the Area of Outstanding Natural Beauty, Special Landscape Area or Landscape Protection Zone. New stables and other ancillary buildings must be well related to an existing group of buildings or, where this is not possible, a hedgerow or other landscape feature which affords substantial screening. Facilities must also generally be well related to the existing bridleway network and must not create local traffic problems.

Within the Green Belt, the provision of new development in connection with horse riding will be strictly controlled. Proposals will only be acceptable where they are essential for the use of the land for horse riding; are small scale; and are designed and sited to have a minimal effect on the openness of the Green Belt and cause no conflict with the purposes of including land within the Green Belt.

The development of commercial uses such as riding schools, arenas, stud farms, racing or livery stables will be strictly controlled in the interests of landscape protection, highway safety and the preservation of the quiet enjoyment of the countryside. Priority must be given to the re-use of existing buildings and any necessary new buildings must be located adjacent to existing buildings.

Reasoned Justification

- 9.21. Horse riding can require considerable areas of land and ranges of buildings for its operation. The potential impact can therefore be considerable. This policy sets out some basic criteria with which proposed developments of this type should aim to comply in order to be satisfactorily accommodated in the countryside.
- 9.22. When considering proposals for new horse riding facilities the Council will have regard to the cumulative effect of the proposal along with other facilities in the locality, in order to avoid an over concentration of such facilities within the rural landscape.
- 9.23. Maintenance of existing, and provision of new, bridleways will be encouraged through consultation with Gloucestershire County Council, who are responsible for Public Rights of Way.

Policy COM1 Protecting Community Assets

Proposals that would lead to the loss of existing community assets will only be permitted where:

1. There is no demonstrable current or future need or demand for the asset, either in its current use or any alternative community use, and the loss would not result in a shortfall of this type of provision.

2. All reasonable efforts have been made to maintain the asset but it has been demonstrated that it would not be viable, feasible or practicable to retain the asset for its existing use.

Where it is demonstrated that it is no longer viable, feasible or practicable to maintain an existing community asset then preference will be given to its re-use as an alternative community facility.

Proposals which result in the unavoidable loss of community assets, where a demand for the facility remains, will be required to make alternative provision, where feasible, of a similar asset as part of the proposed development or on an alternative site within the locality.

Reasoned Justification

- 9.23. Community assets make a key contribution towards the vitality and viability of local communities as well as improving the quality of life of the people within them. The Council therefore seeks to protect and maintain these assets as necessary community facilities. As such, any loss of assets should be exceptional and any proposals involving the loss will need to be fully justified to the satisfaction of the Borough Council.
- 9.24. Community Assets can be made up of a range of different facilities and services which support communities and can include uses such as village shops, community centres, libraries, children's centre, allotments or pubs. However, this list is not definitive and in assessing whether a particular use, building or piece of land is of community value reference will be made to the definition of an asset of community value as set out in the Localism Act 2011 (section 88). A Community asset may also be privately owned as well as public. Specific guidance on Pubs and Local Shops is also provided by Policy RET7 Local Shops and Public Houses.
- 9.25. As a guide, the Borough Council consider that something is deemed to be of community value if the current main use of the building or land furthers the social interests or social wellbeing of the local community, or a use in the recent past has done so. And, it is realistic to think that there can continue to be a main use of the building or land which will further the social interests or social wellbeing of the local community, whether or not in the same way as before.
- 9.26. Proposals for the loss of community facilities will be required to demonstrate that there is no demand for the asset, both at the current time and in future taking into account future development requirements or proposals in the area. It will be essential that the loss of any asset does not result in a shortfall in the provision of a particular service/facility. Applicants should seek the involvement of the local community in evidencing the importance of any asset and the implications of any loss.
- 9.27. For community assets that are commercial operations, in determining whether or not it is still economically viable, the business or organisation will need to be marketed for a consistent period of at least 18 months. It should be marketed at a realistic price and be advertised in an appropriate way. It should also be demonstrated that efforts have been undertaken to secure the viability of the asset through applications for grant funding as well as discussions with community groups,

parish Councils, the Borough Council and County Council concerning the future operation of the facility.

- 9.28. Where it is not viable to retain a community asset then the first preference will be the reuse of the asset for another community facility. In considering this preference the Council will take into account the need or demand for alternative facilities and the feasibility of a community use being possible. As such, applications for the loss of community facilities should be accompanied by supporting information detailing the consideration of its reuse for such alternative provision. The Borough Council further recognises that closure of some community facilities may be undertaken to enable reinvestment in other facilities as part of asset rationalisation programmes that will allow better overall services to be provided elsewhere. This may also factor in to considerations of the feasibility of reusing an existing facility for an alternative community use.

Policy COM2 Broadband Provision

New development of residential and commercial properties should be provided with infrastructure necessary to enable access to high quality broadband. Developers will be required to engage with infrastructure providers at an early stage in order to facilitate this.

Where it is not feasible or viable to provide this, applicants must demonstrate why this is the case and present supporting evidence, including from broadband infrastructure providers. In this instance, alternative infrastructure should be considered which provides the fastest internet connection possible and that could enable greater access in the future.

The Borough Council will support the development of communal public access WIFI hotspots, particularly as part of community, education and other public facilities.

Reasoned Justification

- 9.29. In order to improve the speed and coverage of broadband across the Borough the Council will seek for all new properties to be provided with the necessary infrastructure to gain access to high quality broadband. As minimum this should enable access to 'superfast' broadband.
- 9.30. It is noted, however, there may be circumstances where this is not possible. This may be because it is currently not physically feasible to make the connections or because the cost of doing so would impact on the viability of the development. In these cases applications should be supported by information which sets out why this infrastructure provision is not possible. This should include consultations with broadband infrastructure providers which supports this.
- 9.31. Where connection to superfast broadband is not possible alternative internet provision should be sought which enables accessibility to the highest internet speeds possible. This could include infrastructure that allows for connection to mobile broadband or WIFI, for example. As a minimum,

the infrastructure should be put in place to allow connectivity to new development in future, i.e. ducting for future cables.

Policy COM3 Telecommunications

Proposals for development involving telecommunication equipment will be permitted provided that there is are no unacceptable adverse impacts on the surrounding environment or amenity and health of neighbouring properties. Particular consideration will be given to the visual impact of any proposals within the Area of Outstanding Natural Beauty, Special Landscape Area, Landscape Protection Zone, Conservation Areas and heritage assets.

In the siting of any equipment, every effort must be made to minimise its visual impact. Proposals will be expected to use/share existing structures or buildings where possible.

Reasoned Justification

- 9.32. The Borough Council supports the introduction of modern telecommunications networks which are essential to the growing demand for improved communications in both the home and at work. However, the development of new technology and the upgrading of existing systems can have land use implications in the form of new structures such as masts, aerials and satellite dishes. Such structures can cause particular environmental problems in regards to landscape and amenity impacts.
- 9.33. Applicants will be expected to demonstrate that proposals do not have an unacceptable adverse impact on the surrounding environment or neighbouring properties and show how they have minimised impacts by both careful design and siting and, where appropriate, sharing existing facilities or sites, and the removal of redundant structures.

Policy COM4 Neighbourhood Development Plans

The Borough Council will work positively and proactively with communities who wish to develop a Neighbourhood Development Plan.

Neighbourhood Development Plans must be in conformity with the strategic policies and proposals in the Joint Core Strategy and Tewkesbury Borough Plan. Where this is the case, the Borough Council will seek to progress these plans without delay.

Where a Neighbourhood Development Plan has been 'made' by the Borough Council it will become part of the Statutory Development Plan and its policies will be a material consideration in the determination of planning applications.

Reasoned Justification

- 9.34. The Localism Act 2011 provides the opportunity for local communities to produce their own Neighbourhood Development Plans (commonly referred to as Neighbourhood Plans) that can set out a vision and objectives for their area and contain planning policies for the development and use of land. Tewkesbury Borough Council recognises that Neighbourhood Plans can have a role in bringing forward development to meet local needs, particularly in smaller settlements where strategic levels of growth are inappropriate.
- 9.35. The Borough Council positively supports the work of communities who have made the decision to create a Neighbourhood Plan. The primary role of the Borough Council is to provide guidance on conformity with national planning guidance and with the higher-tier Local Plan documents, but to also advise on plan making in general including the development of a supporting evidence base.
- 9.36. There is a list of basic conditions in the Town and Country Planning Act 1990 that must be met by a Neighbourhood Development Plan before it can be successful at independent examination and ultimately adopted by a Local Planning Authority. One condition is that Neighbourhood Plans must be in general conformity with and reflect the strategic policies of the development plan for area. For Tewkesbury Borough this means in the strategic policies of the Joint Core Strategy and the Tewkesbury Borough Plan. To provide clarity about the strategic policies for neighbourhood planning purposes a list from both the Joint Core Strategy and Tewkesbury Borough Plan have been included at Appendix 4.
- 9.37. Neighbourhood Plans will become part of the planning framework in the local area once they have successfully passed through the stages of consultation, independent examination and community referendum and have been adopted, described in the regulations governing their preparation as 'made' by the Local Planning Authority. This means that their policies will be a material consideration in the determination of planning applications within the area covered by the Neighbourhood Plan, alongside those in the rest of the Local Plan documents.

10. Transport & Accessibility

- 10.1. An efficient and safe transport system is critical to the success of the Borough and the quality of life of its residents and visitors. An important part of this is providing genuine travel choice using different modes; whether that is by walking, cycling, public transport or private vehicle.
- 10.2. The Gloucestershire Local Transport Plan (LTP), prepared by Gloucestershire County Council provides the overarching strategic context for transport in the area. The LTP contains the strategy, policies and investment priorities for transport and needs to be read along the Local Plan to get the full picture on transport policy.
- 10.3. The policies in the Joint Core Strategy support the Local Transport Plan with requirements for developers to provide safe and accessible travel choices, avoiding or mitigating severe predicted increases in congestion, providing the necessary highway infrastructure, walking, cycling and public transport options and preparing Transport Statements, Assessments and Travel Plans where significant amounts of new trips are anticipated.
- 10.4. The Tewkesbury Borough Plan has a role to further support the transport objectives of the LTP by providing more detailed guidance on the delivery of transport infrastructure and consideration of transport as a fundamental part of the design of new developments. In this regard in particular, the policies of the plan should also be read in conjunction with the Manual for Gloucestershire Streets by Gloucestershire County Council.

Policy TRAC1 – Pedestrian Accessibility

Pedestrian networks will be protected across the Borough and opportunities sought to extend and enhance them. Proposals that reduce pedestrian connectivity, or fail to optimise it, will be resisted.

Pedestrian connectivity should be a fundamental consideration in a design-led process for new major development and proposals will be expected to demonstrate this proportionate to the scale of development, including through any Design and Access Statements. New development should, through its design and layout, encourage walking by providing good quality permeable and legible routes both through the development, to local services and to the surrounding area. Development should prioritise pedestrian movement over motorised vehicles in a way that promotes pedestrian safety and convenience.

Accessibility must include the consideration of all potential users, including those with disabilities, to ensure that high standards of inclusivity are achieved to ensure that all members of society can travel safely and easily.

New development will be expected, where appropriate, to contribute towards creating and enhancing pedestrian routes within and between town/village centres as well as to other public transport nodes, key services and employment centres.

Reasoned Justification

- 10.5. The pedestrian network consists of a wide range of routes including streets, quiet lanes, roadside footpaths and public rights of way that together provide opportunities for pedestrian movement. This network will be protected to ensure that convenient routes for walking are maintained and proposals that reduce connectivity or block routes will be resisted. Furthermore, opportunities will be sought, including through new development, to enhance the pedestrian network.
- 10.6. The provision of attractive pedestrian routes within and between existing and proposed developed areas can make an important contribution towards discouraging people from making shorter journeys by car. Pedestrian routes should be safe and direct, following desire lines, to allow for easy and convenient journeys. This includes adequate provision for all users, including those with disabilities. If a street is designed to cater for those within mobility impairments, it is likely to be suitable for all other pedestrians. Where appropriate, routes should be well lit and signage provided to improve accessibility.
- 10.7. For successful pedestrian accessibility to occur then it needs to be a fundamental principle in the design of sites from the start which informs masterplanning and layout at the outset of proposals, particularly for larger developments. Pedestrian accessibility should be a fundamental consideration in a design-led process for new development and proposals will be expected to demonstrate this through any Design and Access Statement.
- 10.8. All development can have a role to play in promoting pedestrian accessibility. However, it is recognised the scale of a proposal will influence to what extent it can contribute to this accessibility. Small-scale residential developments, for example, may only be able to make a limited contribution and only ensure access to any existing routes is provided. While large scale developments may be able to create new pedestrian routes within a site as well as improving connections to facilities outside of it. As such the design and consideration of the pedestrian network should be undertaken at a scale commensurate with the proposal.
- 10.9. When planning for and designing pedestrian infrastructure refer to the best practice provided in documents such as the Manual for Gloucestershire Streets.

Policy TRAC2 – Cycle Network & Infrastructure

Cycle infrastructure should be a fundamental consideration in a design-led process for new major development and proposals will be expected to demonstrate this proportionate to the scale of

development, including through any Design and Access Statements. This includes contributing towards the objectives of this policy.

The protection and enhancement of the cycle network, infrastructure and facilities across the Borough will be sought through the following measures:

- Safeguarding, developing and promoting a borough-wide network of safe and convenient cycle routes, segregated from motorised traffic where this does not detract from the pedestrian environment and where it confers an advantage to the cyclist in terms of journey directness and cycle trip experience.
- Promoting and providing safe, well-lit cycle parking, storage and changing facilities at public transport nodes, schools, community facilities, and employment centres; and requiring new development to provide cycle facilities on site where appropriate.
- Requiring the needs of cyclists to be met in the design of new highway and traffic management schemes.

Reasoned Justification

10.10. Cycle connectivity should be a fundamental consideration in a design-led process for new development and proposals will be expected to demonstrate this through any Design and Access Statement. New development should, through its design and layout, maximise the potential for cycle trips by providing high quality links both through the development and on to the surrounding area. Cycle links should be designed so that they are safe, legible and convenient and be prioritised over motorised vehicles. This can be achieved by giving priority to dominant cycle movements at priority junctions and minimising delays to cycle and pedestrian turning movements in traffic signal phasing. Cyclists should receive at least the level of priority afforded to motor vehicles.

10.11. New development will be expected, where appropriate, to contribute towards creating and enhancing cycle routes within and between town/village centres as well as to other public transport nodes, key services and employment centres. Tewkesbury town and its environs offer particular cycle route opportunities which should be identified, strengthened and not inadvertently impeded.

10.12. It will be important for new development proposals to show understanding of existing cycle routes and informal cycle networks or potential networks. This is particularly important in Tewkesbury Borough where much of the cycle network has grown up around quietly trafficked roads and byways which could be eroded through increased traffic flows.

10.13. To encourage cycling, provision for the secure parking and storage of cycles and related facilities, such as showers and changing areas, should be incorporated within new developments where appropriate. The type and extent of provision should be proportionate to the scale and type of development.

- 10.14. All development can have a role to play in promoting cycling and the cycle network. However, it is recognised the scale of a proposal will influence to what extent it can contribute. Small-scale residential developments, for example, may only be able to make a limited contribution and only ensure access to any existing routes is provided as well as providing individual storage facilities. While large scale developments may be able to create new cycle routes through a site as well as improving connections to routes outside of it. As such the design and consideration of the cycle network and cycle facilities should be undertaken at a scale commensurate with the proposal.
- 10.15. Tewkesbury Borough Council is committed to encouraging the use of bicycles, both for leisure and fitness, and as a viable alternative to car journeys, including trips to work, school and for shopping. To encourage the number of journeys being made by cycle the council will seek to deliver the routes and infrastructure necessary to make travelling by bike as easy and convenient as possible. The provision of direct, safe and well signposted cycle routes is a key part of this, as is the provision of adequate cycle facilities, such as secure parking and storage.
- 10.16. Tewkesbury Borough Council will, in conjunction with Gloucestershire County Council, seek to identify and extend existing cycle routes and to introduce new and improved networks in line with the Local Transport Plan. In particular, the design of new road schemes and junctions will be expected to have full regard to the needs of cyclists, and to make sure that it does not unintentionally damage or create barriers on cycle desire lines. Tewkesbury Borough Council will also work to identify and deliver appropriate cycle facilities, particularly in town and village centres and at key transport interchanges.
- 10.17. This policy, along with those concerning public transport and pedestrian accessibility, will contribute directly to the sustainable transport objectives of the plan. Identification of improvements to the cycle network should proceed in negotiation with Gloucestershire County Council, Cheltenham Borough Council, Gloucester City Council and local cycling amenity groups. Such networks should also investigate links into our neighbouring county of Worcestershire.
- 10.18. When planning for and designing cycle infrastructure refer to the best practice provided in documents such as Making Space for Cycling by Cyclenation and the Handbook for Cycle-Friendly Design by Sustrans, as well as to the MfGS.

Policy TRAC3 Bus Infrastructure

Proposals for major development should be located, where possible, to provide easy and convenient access to bus facilities and services to maximise sustainable travel by public transport. New development should, where appropriate, contribute towards improving bus infrastructure including: the provision of routes designed for bus use; improvements to pedestrian accessibility to bus services; improvements to passenger waiting facilities; real time passenger information and bus priority measures. This should also include the use of Personalised Travel Planning for new developments to encourage public transport use.

On strategic-scale developments, including JCS Strategic Allocations, the potential for bus services to move through the site should be explored and where possible and operationally viable required to enable a sustainable service to be established or routed. The design of such developments should enable the safe, direct and convenient movement of buses including appropriate passenger facilities.

Reasoned Justification

- 10.19. The enhancement of bus services in the borough is essential in order to achieve mode-shift away from private vehicle trips. This means that bus services and facilities need to be convenient, reliable and provide an attractive alternative to users. New development has a key role to play in promoting sustainable travel and ensure that proposals are designed in a way that promotes bus use and does not adversely impact on the operation of bus services. The policies of the Borough Plan support those of the LTP on how new development should integrate bus infrastructure, and the LTP should be read alongside Local Plan policies to provide comprehensive guidance.
- 10.20. Access to public transport should be maximised where possible and new major development should provide easy and convenient access to bus services. However, in line with the NPPF, it is recognised that the potential to do this will vary from urban to rural areas and that in some rural areas of the Borough close proximity to bus services is not always possible. In rural areas in particular, there are issues of the viability of running buses services which limits the amount of service that can be delivered and sustained.
- 10.21. For bus services to be convenient and attractive bus stops should be no more than 400m walking distance to new residential properties. The Borough Council will use this distance as a guide to judging the accessibility of a new development by bus. Bus stops should, where appropriate, incorporate the latest technology to further improve convenience and information for users. This may include measures such as real-time passenger information.
- 10.22. For larger scale developments the Borough Council may seek contributions towards the provision and operation of new bus services where the potential demand from a development would necessitate the running or diversion of services.
- 10.23. In July 2017, Stagecoach published general highways and urban design guidance around bus services and new developments. This document provides useful specifications for highway design in ensuring that buses and bus infrastructure are well designed and sufficient to cater for bus services and accessibility to them. Proposals for development that include the provision of bus infrastructure should refer to this guidance as well as that contained within the Manual for Gloucestershire Streets.

Policy TRAC4 High Frequency Bus Routes

High Frequency Bus Routes identified through the Gloucestershire Local Transport Plan will be maintained as key public transport corridors. Measures that improve journey time and reliability for public transport along these routes will be sought. Development proposals which lead to an increase in vehicle traffic on these corridors will be required to contribute towards the provision of sustainable transport and bus improvement measures to mitigate any impact and maintain the operation of the high frequency route.

Reasoned Justification

10.24. Gloucestershire Local Transport Plan identifies a number of high frequency routes through the borough. High frequency routes are generally where there is a service running every 10-15 minutes. On the whole these link to the main service and employment hubs in the area but serve many rural settlements in between. These include the A38 between Tewkesbury and Gloucester, the A38/A4019 between Tewkesbury and Cheltenham and the A40 between Cheltenham and Gloucester. These links should be safeguarded as such and proposals which would have a negative impact on bus operation along them should contribute towards adequate mitigation to resolve it.

Policy TRAC5 Ashchurch for Tewkesbury Rail Station

Tewkesbury Borough Council will seek to increase in the frequency of train services and the enhancement of facilities at the Ashchurch for Tewkesbury station. This will include measures to improve accessibility to the station itself via all modes of transport. New development will be expected, where appropriate, to provide adequate connections to the station and contribute towards the enhancement of the station.

Reasoned Justification

10.25. Ashchurch for Tewkesbury station is the only mainline railway station in the Borough and is an important transport link. With growth in the Ashchurch area proposed through the Joint Core Strategy, as well as other potential development opportunities around M5 Junction 9 and Tewkesbury Town itself, the station will have increased importance as a transport link. However, the station would benefit from more frequent services and better passenger facilities. Currently direct services to Bristol are every 2 hours and there are only 2 or 3 direct services to Birmingham per day. Tewkesbury Borough Council will work with Gloucestershire County Council, the rail industry, the Ashchurch, Tewkesbury and District Rail Promotion Group (ATDRPG) and adjacent local authorities to raise the profile of the station as Tewkesbury's Parkway and seek improved services towards Birmingham and Bristol as well as to Cheltenham and Worcester. The station would also benefit from improved accessibility and Tewkesbury Borough Council will seek to improve links to the station from the surrounding area, particularly Tewkesbury Town. Facilities

are not restricted to, but will include: improved signposting, publicity, passenger waiting facilities, ticket machines as well as extended and improved cycle storage and parking.

Policy TRAC6 M5 Junction 9/A46 Corridor

Tewkesbury Borough Council will support the design and implementation of highway infrastructure improvements along the A46 corridor to Junction 9 of the M5. Infrastructure schemes, including 'online' and 'offline' measures, along the A46 will be supported where they improve accessibility for all modes of transport and promote journey time reliability. The implementation of a package of highway capacity improvements will need to incorporate bus priority measures and active travel measures to improve travel choice and reduce journey time uncertainty along this corridor.

New development along this corridor must not prejudice the delivery of objectives and infrastructure improvements, including major road schemes, identified through the JCS Transport Implementation Strategy or the Gloucestershire Local Transport Plan.

Reasoned Justification

- 10.26. As part of the evidence base underpinning the Joint Core Strategy, transport modelling work has been undertaken with Gloucestershire County Council and Highways England to understand the impact of future development on the highway network. As a result of this work it is recognised that the A438/A46/M5 Junction 9 corridor already has significant capacity issues. The existing infrastructure will therefore not be sufficient to accommodate the additional traffic generated by the strategic growth employment and housing growth that this proposed through the Joint Core Strategy as well as the further development potential in the area without significant transport interventions. It is recognised that there are a limited amount of infrastructure improvements that can be made to the existing A46 to increase capacity. Therefore, an 'offline' solution is being explored which would re-route the A46.
- 10.27. The transport modelling work helped to identify a package of infrastructure improvements that will be required to mitigate the impact of development on the highway network. Tewkesbury Borough Council, in partnership with Gloucestershire County Council and the Highways England, will be working to deliver these improvements to facilitate new development. These improvements are recognised in both the Joint Core Strategy Transport Implementation Strategy and the County Council's Local Transport Plan.
- 10.28. Public transport and active travel needs to be a key part of the transport strategy for this corridor and will have an important role to play to improving accessibility and reducing the number of vehicle movements, particularly for local trips within the Tewkesbury and Ashchurch area. Any infrastructure improvement needs to also maximise the potential for sustainable modes of transport.

Policy TRAC7 Tewkesbury Northern Bypass Corridor

The Tewkesbury Northern Bypass corridor, as identified on the Policies Map, will be safeguarded for the development of a multi-modal transport route.

Reasoned Justification

10.29. Following its public consultation exercise Gloucestershire County Council resolved not to proceed with the Tewkesbury Northern Bypass, and also to cancel the protection applying to the parts of the route between Northway Lane and Greenway Lane along the disused railway line, and also phase 4 (The Mythe Causeway) to the west of Bredon Road. While the scheme has now been abandoned, it is necessary to retain the protection of phases 1, 2 and 3, that is, the section between Bredon Road and Ashchurch Road, the link to Northway Lane, Northway Lane upgrading, (the Newtown Bypass), and Shannon Way junction upgrading. This protects the route should its provision prove essential in the long term following implementation of development permitted and projected for the Tewkesbury Ashchurch area.

Policy TRAC8 Old Railway Line Tewkesbury

The old railway line, as identified on the Policies Map, is safeguarded for the provision of a cycleway and footpath. Development which prejudices its current and future use as cycleway or footpath route will not be supported.

Reasoned Justification

10.30. The old railway line between Shannon Way and Bredon Road originally formed part of the safeguarded route of the Tewkesbury Northern Bypass. This route forms an important off road route for cyclists and pedestrians between Newtown and Tewkesbury.

Policy TRAC9 Parking Provision

Proposals for new development that generate a demand for car parking space should be accompanied by appropriate evidence which demonstrates that the level of parking provided will be sufficient. The appropriate level of parking required should be considered on the basis of the following:

1. the accessibility of the development;
2. the type, mix and use of development;
3. the availability of and opportunities for public transport;
4. local car ownership levels;

5. an overall need to reduce the use of high emission vehicles; and
6. a comparison of the forecast trip generation and resultant accumulation with the proposed parking provision.

New development should incorporate electric vehicle charging points. This includes the provision of communal facilities at employment, retail and community development and for residential on-street parking or parking courts.

Parking provision must be well designed, safe and accessible, contributing towards a high-quality environment and promoting active streets. Where feasible, parking areas are encouraged to incorporate sustainable drainage systems.

Reasoned Justification

- 10.31. The Borough Council is not proposing to set specific parking standards through the Borough Plan to cover all types of development. There are many factors that may influence the level of parking that might be needed and these should be considered during the planning of any proposal. For example, the location and accessibility of a development may be an aspect which may alter the need for private vehicle use and increase the use of active travel and public transport. Further, the exact size, type and uses proposed for a development may greatly vary the parking demand and therefore the provision required. Further guidance on parking provision may be explored through a separate supplementary planning document.
- 10.32. It is important that the right amount of parking is provided for – particularly for new residential and commercial development and other development proposals that are likely to generate parking demands. Therefore, each proposal will be expected to undertake an analysis of the amount of parking that would be adequate to serve the needs of the development and not cause an unacceptable impact on the surrounding area – both in terms of maintaining ease of movement and protecting the quality of the environment. Evidence should however be proportionate to the type of development proposed. Developments that would not result in a need for additional parking space will not be expected to provide evidence demonstrating that the level of parking provided will be sufficient. For commercial schemes, the needs of delivery vehicles should also be factored into the parking provision at a site.
- 10.33. The design and arrangement of parking within a development can have an important impact on the quality of the environment and the accessibility of streets. The provision of parking for new development must not be to the detriment of achieving quality urban design. As part of this, the preference will be for frontage and on-street parking to be provided before considering the use of rear-court parking. The type and layout of parking provided should take into account the nature and mix of development as well as specific design considerations of the site. Parking facilities should also incorporate Secured by Design principles to maximise safety and security.
- 10.34. Sufficient space should be made for parking bays to ensure that they are of sufficient dimensions to accommodate vehicles and allow easy access to them. This includes consideration of the needs

of disabled and elderly users. The provision of garages will generally not be considered as a parking space for the purpose of determining whether a development is making adequate provision.

APPENDIX 1

NATIONALLY DESCRIBED SPACE STANDARDS



Department for
Communities and
Local Government

Technical housing standards – nationally described space standard



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Technical housing standards – nationally described space standard

Introduction

1. This standard deals with internal space within new dwellings and is suitable for application across all tenures. It sets out requirements for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home, notably bedrooms, storage and floor to ceiling height.
2. The requirements of this standard for bedrooms, storage and internal areas are relevant only in determining compliance with this standard in new dwellings and have no other statutory meaning or use.

Using the space standard

3. The standard Gross Internal Areas set out in Table 1 are organised by storey height to take account of the extra circulation space needed for stairs to upper floors, and deal separately with one storey dwellings (typically flats) and two and three storey dwellings (typically houses).
4. Individual dwelling types are expressed with reference to the number of bedrooms (denoted as 'b') and the number of bedspaces (or people) that can be accommodated within these bedrooms (denoted as 'p'). A three bedroom (3b) home with one double bedroom (providing two bed spaces) and two single bedrooms (each providing one bed space) is therefore described as 3b4p.
5. This allows for different combinations of single and double/twin bedrooms to be reflected in the minimum Gross Internal Area. The breakdown of the minimum Gross Internal Area therefore allows not only for the different combinations of bedroom size, but also for varying amounts of additional living, dining, kitchen and storage space; all of which are related to the potential occupancy.
6. Relating internal space to the number of bedspaces is a means of classification for assessment purposes only when designing new homes and seeking planning approval (if a local authority has adopted the space standard in its Local Plan). It does not imply actual occupancy, or define the minimum for any room in a dwelling to be used for a specific purpose other than in complying with this standard.
7. Minimum floor areas and room widths for bedrooms and minimum floor areas for storage are also an integral part of the space standard. They cannot be used in isolation from other parts of the design standard or removed from it.

8. The Gross Internal Area of a dwelling is defined as the total floor space measured between the internal faces of perimeter walls¹ that enclose the dwelling. This includes partitions, structural elements, cupboards, ducts, flights of stairs and voids above stairs. The Gross Internal Area should be measured and denoted in square metres (m²).
9. The Gross Internal Areas in this standard will not be adequate for wheelchair housing (Category 3 homes in Part M of the Building Regulations) where additional internal area is required to accommodate increased circulation and functionality to meet the needs of wheelchair households.

Technical requirements

10. The standard requires that:
 - a. the dwelling provides at least the gross internal floor area and built-in storage area set out in Table 1 below
 - b. a dwelling with two or more bedspaces has at least one double (or twin) bedroom
 - c. in order to provide one bedspace, a single bedroom has a floor area of at least 7.5m² and is at least 2.15m wide
 - d. in order to provide two bedspaces, a double (or twin bedroom) has a floor area of at least 11.5m²
 - e. one double (or twin bedroom) is at least 2.75m wide and every other double (or twin) bedroom is at least 2.55m wide
 - f. any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (if the area under the stairs is to be used for storage, assume a general floor area of 1m² within the Gross Internal Area)
 - g. any other area that is used solely for storage and has a headroom of 900-1500mm (such as under eaves) is counted at 50% of its floor area, and any area lower than 900mm is not counted at all
 - h. a built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. The built-in area in excess of 0.72m² in a double bedroom and 0.36m² in a single bedroom counts towards the built-in storage requirement
 - i. the minimum floor to ceiling height is 2.3m for at least 75% of the Gross Internal Area

¹ The internal face of a perimeter wall is the finished surface of the wall. For a detached house, the perimeter walls are the external walls that enclose the dwelling, and for other houses or apartments they are the external walls and party walls.

Table 1 - Minimum gross internal floor areas and storage (m²)

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

*** Notes (added 19 May 2016):**

1. Built-in storage areas are included within the overall GIAs and include an allowance of 0.5m² for fixed services or equipment such as a hot water cylinder, boiler or heat exchanger.

2. GIAs for one storey dwellings include enough space for one bathroom and one additional WC (or shower room) in dwellings with 5 or more bedspaces. GIAs for two and three storey dwellings include enough space for one bathroom and one additional WC (or shower room). Additional sanitary facilities may be included without increasing the GIA provided that all aspects of the space standard have been met.

3. Where a 1b1p has a shower room instead of a bathroom, the floor area may be reduced from 39m² to 37m², as shown bracketed.

4. Furnished layouts are not required to demonstrate compliance.

APPENDIX 2

LOCALLY IMPORTANT OPEN SPACES

ALDERTON

Land at Beckford Road/
Willow Bank Road

Attractive open space important to
village character

ASHCHURCH

Land adj Ashchurch
Church

Open area separating the church from the village

ASHLEWORTH

Ashleworth Green

Attractive focal point in the village which
contributes to the character of the area

BADGEWORTH

Badgeworth Green

Attractive village green

BISHOPS CLEEVE

Tobysfield Road
(three areas)

Attractive open spaces which contribute to the character of
residential areas

Vilverie Mead

"

St Michael's Avenue

"

Linworth Road

"

Crown Drive

"

Hisnams Field

Attractive open spaces which contribute to the character of
residential areas

Greenmeadow Bank

"

Stonecroft Close

"

Jardine Drive

"

Grange Field

Large area of parkland of amenity value

BROCKWORTH

Green Way	Attractive open space within residential area
Green Street	Important visual gap between the existing built up area and Gloucester Business Park
Land Adj. Horsbere Brook	Linear open space forming a landscaped edge to the built-up area

CHURCHDOWN

Highgrove Way (two areas)	Attractive open spaces which contribute to the character of the residential areas
Boleyn Close	"
Mary Rose Avenue	"
Buckingham Drive	"
Yew Tree Way	"
Springwell Gardens	"
Green Lane	"
Barnes Wallis Way	Attractive open spaces which contribute to the character of the residential areas
Cordingley Close	"
Station Road	Attractive park adjacent St Andrews Church
RAF Sports Field	Visually important space separating built-up areas, and providing a link to surrounding countryside

DEERHURST

Junction of Sawpit Lane/ Severn Way	Village focal point
Village Green	Attractive village focal point
Adj St Ringers Cottage	Amenity area.

DOWN HATHERLEY

Land adjacent Church	Attractive visual amenity area
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DUMBLETON

Greens adjacent Church	Attractive amenity areas which enhances the character of the village
Blacksmiths Lane	Attractive open space
Land opposite Garden Close	Attractive open space
Wormington Green	Attractive village focal point

GOTHERINGTON

Shutter Lane	Attractive visual element within the street scene
Daffodil Bank (adj School)	Attractive visual amenity area
Lawrences Meadow	Attractive visual amenity area

HAWLING

East of Hawling Manor	Open space which contributes to the character of the settlement
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HIGHNAM

Highnam Green	Attractive open green
Limekiln Grove	Attractive visual amenity area
Oakridge (two sites)	Attractive visual amenity areas

NORTON

Green (Bishops Norton)	Attractive village focal point
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SANDHURST

Green (Opposite Pennells Farm)	Attractive open area
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SHURDINGTON

Church Lane	Attractive open area
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SNOWSHILL

Green around Church	Focal point in the village which enhances the character of the area
Opposite Snowshill Manor	Attractive open area
Rear of Manor Cottages	Significant visual amenity value with several prominent trees

STANTON

Wedgewood Cottages	Attractive open area
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STOKE ORCHARD

Orchard opposite Manor
Farm

Makes an important visual contribution
to the character of the street scene

TEDDINGTON

Alstone Lawns Paddock

Visually attractive area which contributes to the character of the
settlement

TEWKESBURY

Abbey Grounds

Visually important space in terms of both the setting of the Abbey
and the character of the conservation area

Vineyards

Major parkland/recreational area on the edge of the town centre

Friends Burial Ground

Attractive visual amenity area

Bredon Road Amenity Space

Attractive visual amenity area

Howells Road Park

Space important to the open character of the street

Queens Road/Warwick Place Play Area

Focal open space within the built up area

Derek Graham Memorial Gardens

Attractive visual amenity area

TWYNING

Twyning Green

Visually attractive village focal point

WINCHCOMBE

Vineyards Street

Attractive visual amenity areas

(two areas)

adjacent to the River Isbourne

Silk Mill Lane

Visually attractive area important to the street scene

WOODMANCOTE

Recreation Ground

Attractive visual amenity area in the heart of the village

Honeybourne Meadow

Attractive visual amenity area

APPENDIX 3

LOCAL NATURE CONSERVATION SITES

LOCAL WILDLIFE SITES

ALDERTON

Dixton Hill: Identified because of the unusual range of flora found on the upper part of the south-west facing slope of the hill.

Dixton Grove: An ancient semi-natural wood with a varied and diverse flora.

ASHLEWORTH

Meerend Thicket: An area of scrub in which a number of hides have been established to facilitate the viewing of birds on the Ham.

BISHOPS CLEEVE

Wingmoor Farm Meadow: Unimproved species-rich meadow.

BODDINGTON

Priors Grove (part): An area of ancient semi-natural woodland of interest for its wood bank and old coppice.

BROCKWORTH

Cooper's Hill: Dense high forest Beech, open scrub and grassland habitats with a wide range of flora including several rare and local species. (Most of the site is part of the Cotswold Commons and Beechwoods SSSI).

Brockworth Park: Remnant trees from a mediaeval deer park site. A number of scattered ancient oak pollards with some younger trees. Saproxyllic beetle fauna of exceptional interest.

BUCKLAND

Buckland Wood: An ancient semi-natural wood on a north-east facing hillside of particular interest because of its coppice structure in the east and its flora.

Wormington Brake: A small low-lying damp ancient semi-natural wood of interest because of its flora.

Wynniatt's Brake: A small semi-natural woodland on a low-lying damp site of interest because of its varied flora.

CHACELEY

Chaceley Meadows: A neutral unimproved herb-rich meadow, a habitat formerly widespread in the Severn Vale but now scarce.

CHURCHDOWN

Churchdown Hill Meadows: Two unimproved meadows with uncommon species of flora.

DEERHURST

Gloucestershire Wildlife Trust Reserve: A small osier bed adjacent to the River Severn important as an intermittent breeding site for a locally rare bird, there is an unimproved meadow adjacent to the reserve which is also of interest.

Coombe Hill Canal: An area of partially improved flood meadows and drainage channels adjoining the disused Coombe Hill canal.

Walton Hill Meadow: An unimproved neutral meadow exhibiting a very rich flora.

Haw Bridge Ditch: A ditch supporting a population of the nationally rare true fox-sedge.

DUMBLETON

Dumbleton Wood: An ancient woodland of particular interest for its large ash and hazel coppice and its varied ground flora.

GOTHERINGTON

Gotherington Wood: Unimproved limestone and neutral grassland, with some scrub, on the steep slopes of Nottingham Hill.

GREAT WITCOMBE

Witcombe Reservoirs: Three reservoirs of particular importance for their breeding and wintering waterfowl.

Witcombe Wood: A large ancient semi-natural wood of particular importance because it forms an integral part of the internationally important Cotswold Beechwoods complex.

HASFIELD

Corse Grove: An ancient semi-natural woodland of interest for its coppice stools and flora, its variety of habitats and old coppice trees.

Mixhill Wood: A mostly semi-natural ancient woodland with a varied flora including wood anemone.

HAWLING

- Gazeley Wood: An ancient semi-natural wood with a species-rich ground flora.
- Nettleton Hill Wood: A mainly semi-natural woodland with some recent plantations.
- Hawling Grove: An ancient and mostly semi-natural wood.
- Granham Plantation: An ancient and mostly semi-natural woodland with a species-rich ground flora.
- Bespidge Wood (part): An ancient wood, part of which retains an ancient semi-natural canopy, and of particular interest for its diverse flora.
- Limehill Wood: An ancient semi-natural wood with a varied flora.

HIGHNAM

- Highnam Woods: A large area of semi-natural woodland and plantation comprising the largest block in the Severn Vale and noted for its nightingales.
- Corseleas Brake: An ancient wood of particular interest for its varied flora, structure and birds.
- Piper's Grove: An ancient wood with a varied flora.
- Lassington Wood: A gently sloping woodland originally planted as a landscape feature, with a good flora and wide range of woodland birds.

LEIGH

- Flood Meadow adjacent to the Coombe Hill Canal SSSI: Area of partially improved flood meadows.

LONGFORD

- Brick-earth Pits: A number of disused and now flooded brick-earth pits along the river bank.

MAISEMORE

- Walham Ponds: Two disused brick pits colonised by a rich variety of wetland plants and animals.

Walham Ponds Brickpits: Two disused brickpits with open water, reed swamp and osier bed habitats.

- Maisemore Roughett: Banks of calcareous grassland supporting a rich flora and of a semi improved nature.

NORTON

Priors Grove: An ancient semi-natural wood of interest for its wood bank and old coppice.

OXENTON

The Knolls, Oxenton Hill: An area of unimproved limestone grassland on the summit of Oxenton Hill.

PRESCOTT

Stanley Wood: An ancient semi-natural and secondary woodland, of particular interest for its old coppice, diversity of habitat and woodland flora.

SANDHURST

Sandhurst Brickpits: Two flooded disused brickpits which now support a variety of habitat types with fine plant, insect and bird populations.

Ashleworth Quay Brickpits: Flooded brickpits of interest for their aquatic flora and invertebrate populations.

Sandhurst Hay Meadow: A small hay meadow noted for the presence of meadow saffron.

SHURDINGTON

Shurdington Grove: An ancient semi-natural woodland of particular interest for its old hazel coppice and open glades which are a good habitat for butterflies.

SNOWSHILL

Littleworth Wood: An ancient semi-natural wood of particular interest for its varied flora.

Shippy Grove: A high quality semi-natural woodland with a small area of conifer plantation of particular interest because of the old ash pollards along the northern boundary, and field maple coppice stools in the centre of the wood.

Hornsleasow Roughs SSSI: A nationally important limestone grassland site which supports a number of nationally and locally rare plant species.

SOUTHAM

Queen's Wood: An area of ancient woodland.

Prestbury Grasslands : An area of unimproved limestone grassland to the south of Cleeve Common.

Nutterswood Wood}

Thrift Wood } Three areas of ancient semi-natural woodland on the scarp slope.

Stutfield Wood }

Queenswood Farm: Parkland with a grassland and scrub mosaic containing mature parkland trees which are mainly oak, ash and beech.

STANTON

Shenberrow Hill: Of importance for its herb-rich grasslands.

STANWAY

Lidcombe Wood: An ancient wood, half of which retains a semi-natural canopy with the remainder replanted with conifers, and supporting a varied flora.

Congrove Wood: An ancient semi-natural wood of particular interest for its old coppice and pollard field maple and varied ground flora.

Hailes Wood: An ancient wood of particular interest because of its varied flora and a stand of small leaved lime.

Thrift Wood: An ancient semi-natural wood with a varied flora.

SUDELEY

Humblebee How: Mainly ancient semi-natural woodland on steep east facing slope.

West Wood }

Willis's Coppice }

Bespidge Wood } Ancient or semi-natural woodland.

Limehill Wood (part) }

Spoonley Wood }

TEDDINGTON

Teddington Grove: Replanted ancient woodland, with various flora including the Trailing St John's wort, and an excellent example of an area of heavy clay susceptible to ongoing landslip.

TEWKESBURY

Mythe Railway Gloucestershire Wildlife Trust Reserve (part): A disused railway supporting a collection of plants unusual in the Severn Vale.

Mythe Lake, Osier Beds and Cliff: A lake, disused osier bed and cliff exceptionally rich in bird, insect and plant species.

Tewkesbury Disused Railway Line: An area of scrub, open grassy areas and secondary woodland. Identified for its glow worm population.

TODDINGTON

Shetcombe Wood }

Dumbleton Hill } Two areas of ancient woodland.

TWYNING

Brockridge Common: An intensively grazed area of unimproved acid grassland and gorse scrub which grades gradually into birch, oak and ash wood.

Shuthonger Common: An area of common divided into three areas by roads, including a semi-improved meadow and a pond.

Mythe Railway: A small part of the designated area comprising the disused railway of interest because of its range of plants which are unusual in the Severn Vale, birds and insects.

WALTON CARDIFF

Walton Cardiff Newt Ponds: Unimproved pasture with boundary hedgerows with a number of ponds within the field system which support a significant breeding population of great crested newts.

WINCHCOMBE

Stancombe Wood: An ancient woodland of particular interest because of its varied flora.

Breakheart Plantation: An ancient semi-natural and ancient replanted woodland of special interest because of indications of ancient wood pasture, its wide variety of habitats and diverse ground flora.

WOODMANCOTE

Nottingham Hill: An area of unimproved limestone and neutral grassland.

Bushcombe Wood: An area of ancient semi-natural woodland.

C. LOCAL GEOLOGICAL SITES

TEWKESBURY

Mythe Railway Cutting:	Identified because there are few exposures of Mercia Mudstones and Pleistocene Sands and gravels in the area.
The Red Cliff, Mythe Hill:	The exposed rocks are the deepest open section of Mercia Mudstones in the County.
Norton Hill Gravel Pits:	Small former gravel pit.
Sand Mine Quarry Cleeve Hill:	A rare exposure of the Harford Sands, especially valuable in relation to the variety of geology surrounding it on Cleeve Common.
Sandhurst Brick Pits:	The easily accessible pits expose alluvium clays from the Holocene age. Low angled current bedding is occasionally visible.
Shurdington Sand and Gravel Pit:	Recently worked shallow sand pit, c.5m deep. Bottom of pit indicates the base of the Cheltenham Sands in a superficial deposit. A rare example of the generally poorly exposed Cheltenham Sands.
Old Quarries Gretton:	A historical site worked from the C19th for the famous fish, insect and reptile bed of the Whitby Mudstone Formation. (Upper Lias). This is a very important academic site.
Hardstone Quarry, Cleeve Hill:	Contact between Cleeve Cloud and Scottsquar members is clearly exposed and easily and safely accessible.
Cleeve Cloud Fault Section:	The major fault at this location automatically qualifies it as a RIGS. This is important for regional structural analysis and a good educational site.
Grass Grown Quarry, Cleeve Hill:	High value as a regionally important site for scientific and educational reasons.
Pot Quarry and Rolling Bank Quarry:	An excellent site exposing rocks not seen at any other location. Exposes a bored and encrusted hardground, sedimentary structures and a major fault as well as a substantial sequence of rocks.
Roadstone Quarry:	This site exposes regionally important strata with a high educational value, and has local historical significance.
Charlton Kings Quarry:	Although little geology is exposed the site is valuable in demonstrating geomorphological features such as rotational cambering and land slippage.
Maisemore Cliff	Low cliff actively eroding in the west channel of the River Severn where valuable exposures of ice age gravels have become exposed.

APPENDIX 4

STRATEGIC POLICIES AND PROPOSALS IN THE JOINT CORE STRATEGY AND TEWKESBURY BOROUGH PLAN

The Council has used the guidance provided within Paragraph 20 of the National Planning Policy Framework (NPPF) and Paragraph 074 -077 (Ref ID: 41-074-20140306) in the National Planning Practice Guidance (NPPG) to define the strategic policies in the Joint Core Strategy (JCS) and this Tewkesbury Borough Plan (TBP).

Extract from NPPF

Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:

1. the homes and jobs needed in the area;
2. the provision of retail, leisure and other commercial development;
3. the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
4. the provision of health, security, community and cultural infrastructure and other local facilities; and
5. climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

Extract from NPPG

When reaching a view on whether a policy is a strategic policy the following are useful considerations:

- A. whether the policy sets out an overarching direction or objective;
- B. whether the policy seeks to shape the broad characteristics of development;
- C. the scale at which the policy is intended to operate;
- D. whether the policy sets a framework for decisions on how competing priorities should be balanced;
- E. whether the policy sets a standard or other requirement that is essential to achieving the wider vision and aspirations in the Local Plan;
- F. in the case of site allocations, whether bringing the site forward is central to achieving the vision and aspirations of the Local Plan; and
- G. whether the Local Plan identifies the policy as being strategic.

Joint Core Strategy (2011-31)

Policy in JCS	NPPF Guidance	NPPG Definition	Comments
Paragraph 2.2 - Vision		A	Overarching vision
Paragraph 2.35 – Strategic Objectives 1 to 9	1, 2, 3, 4, 5	A	Overarching objectives
Policy SP1 – The Need for New Development	1	A, B, C, E, G	Overarching objective
Policy SP2 - Distribution of New Development	1	A, C, E, F, G	Overarching objective / Essential to delivery of development strategy
Policy SD1 - Employment	1	A, B, F, G	Overarching objective

Policy in JCS	NPPF Guidance	NPPG Definition	Comments
Policy SD2 - Retail and City / Town Centres	1, 2	A, C, E	Overarching objective
Policy SD3 - Sustainable Design and Construction	5	A, B, E, G	Overarching objective
Policy SD4 – Design	3, 4, 5	A, B, E	Overarching objective
Policy SD5 - Green Belt	5	A, C, D, G	Overarching objective / Essential to delivery of development strategy
Policy SD6 - Landscape	5	A, D, E, G	Overarching objective
Policy SD7 - AONB	5	A, D, E, G	Overarching objective
Policy SD8 Historic Environment	5	A, B, D, E	Overarching objective
Policy SD9 – Biodiversity and Geodiversity	5	A, D, E, G	Overarching objective
Policy SD10 – Residential Development	1	A, B, C, E	Overarching objective / Essential to delivery of development strategy
Policy SD11 - Housing Mix and Standards	1	A, B, E,	Overarching objective
Policy SD12 - Affordable Housing	1	A, C, D, E	Overarching objective
Policy SD13: GTTS	1	A, C, E	Overarching objective
Policy SD14 – Health and Environmental Quality	4, 5	A, B, D, E, G	Overarching objective
Policy SA1 - Strategic Allocations	1, 2, 3, 4, 5	A, C, D, F, G	Site Allocations / Essential to delivery of development strategy
Policy INF1 – Transport Network	3	A, B, C, E	Overarching objective
Policy INF2 - Flood Risk Management	3, 5	A, B, D, E, G	Overarching objective
Policy INF3 – Green Infrastructure	4, 5	A, B, D, E	Overarching objective
Policy INF4 - Social and Community Infrastructure	2, 4	A, B, D, E	Overarching objective
Policy INF5 – Renewable Energy and Low Carbon Energy Development	4, 5	A, B, D, E, G	Overarching objective
Policy INF6 – Infrastructure Delivery	3, 4	A, B, C, E, G	Overarching objective
Policy INF7 – Developer contributions	3, 4	A, E	Overarching objective
Policy SA1 - Strategic Allocations	1, 2, 3, 4, 5	A, C, D, F, G	Site Allocations / Essential to delivery of development strategy

Tewkesbury Borough Plan (2011-31)

Policy in TBP	NPPF Guidance	NPPG Definition	Comments
Vision		A	Overarching vision
Objectives	1, 2, 3, 4, 5	A	Overarching objectives
Policy RES1 Housing Site Allocations	1	A, B, C, E, F	Site Allocations / Essential to delivery of development strategy

Policy in TBP	NPPF Guidance	NPPG Definition	Comments
Policy RES2 Settlement Boundaries	1	A, C, E	Overarching objective / Essential to delivery of development strategy
Policy RES3 New Housing Outside Settlement Boundaries	1, 5	A, B, C, E	Overarching objective / Essential to delivery of development strategy
Policy RES4 New housing at other rural settlements	1, 5	A, B, C, D, E	Overarching objective / Essential to delivery of development strategy
Policy RES6 Rural Exception Sites	1	A, B, C, D, E	Overarching objective / Essential to delivery of development strategy
Policy RES12 Affordable housing	1	A, B, C, E	Overarching objective / Essential to delivery of development strategy
Policy RES13 Housing mix	1	A, B, C, E	Overarching objective
Policy RES14 Specialist accommodation for older people	1	A, B, C, D, E	Overarching objective
Policy GTTS1: Site allocations for Gypsies and Travellers	1, 4	A, C, F	Overarching objective / Essential to delivery of development strategy
Policy EMP1 Major Employment Sites	2	A, B, C, E	Overarching objective
Policy EMP2 Rural Business Centres	2	A, B, C, E	Overarching objective
Policy EMP4 Rural Employment Development	2, 5	A, B, C, D, E	Overarching objective
Policy EMP6 Safeguarding of Employment Sites	2	A, B, C, D, E	Overarching objective
Policy GRB1 – Green Belt Review	1, 5	A, C, F	Overarching objective / Essential to delivery of development strategy
Policy GRB2 – Gloucestershire Airport	1, 2, 3	A, B, C, D, E	Overarching objective / Essential to delivery of development strategy
Policy RET1 Maintaining the vitality and viability of the town, borough and local centres	2	A, B, C, D	Overarching objective
Policy RET4 Out of Centre Development	2	A, C, D	Overarching objective
Policy RET9 – Tewkesbury Town Regeneration	1,2,5	A, B, C, E, F	Overarching objective / Essential to delivery of development strategy
Policy DES1 Housing Space Standards	1	A, C, E	Overarching objective
Policy HER1 Conservation Areas	5	A, B, C, E	Overarching objective
Policy HER2 Listed Buildings	5	A, B, C, E	Overarching objective

Policy in TBP	NPPF Guidance	NPPG Definition	Comments
Policy HER3 Historic Parks and Gardens	5	A, B, C, E	Overarching objective
Policy HER4 Archaeological Sites and Scheduled Ancient Monuments	5	A, B, C, E	Overarching objective
Policy HER5 Locally Important Heritage Assets	5	A, B, C, E	Overarching objective
Policy HER6 Tewkesbury (1471) Historic Battlefield	5	A, B, C, E	Overarching objective
Policy LAN1 Special Landscape Areas	5	A, B, C, D, E	Overarching objective
Policy LAN2 Landscape Protection Zone	5	A, B, C, D, E	Overarching objective
Policy LAN3 Strategic Gaps	5	B, C, D	Essential to achieving the wider vision and aspirations of the Local Plan
Policy NAT1 Biodiversity, Geodiversity and Important Natural Features	5	A, B, C, D, E	Overarching objective
Policy NAT2 The Water Environment	5	A, B, C, D, E	Overarching objective
Policy NAT3 – Green Infrastructure: Building with Nature	5	A, B, C, E	Overarching objective
Policy NAT5 – Cotswolds Beechwoods	5	A, B, C, D, E	Overarching objective
Policy ENV1 Development near sewage treatment works	5	B, C, D	Essential to achieving the wider vision and aspirations of the Local Plan
Policy ENV2 Flood Risk and Water Management	5	A, B, C, D, E	Overarching objective
Policy TRAC1 – Pedestrian Accessibility	3, 5	A, B, C, D, E	Overarching objective
Policy TRAC2 – Cycle Network & Infrastructure	3, 5	A, B, C, D, E	Overarching objective
Policy TRAC3 Bus Infrastructure	3, 5	A, B, C, D, E	Overarching objective
Policy TRAC4 High Frequency Bus Routes	3, 5	A, B, C, D, E	Overarching objective
Policy TRAC 5 Ashchurch for Tewkesbury Rail Station	3, 5	A, B, C, D, E	Overarching objective
Policy TRAC7 M5 Junction 9/A46 Corridor	3, 5	A, B, C, D, E	Overarching objective

Policy in TBP	NPPF Guidance	NPPG Definition	Comments
Policy TRAC9 Parking Provision	3	A, B, C, D, E	Overarching objective
Policy HEA1 Healthy & Active Communities	4	A, B, C, D, E	Overarching objective
Policy RCN1 Public Outdoor Space, Sports Pitch and Sports Facility Provision	2, 4	A, B, C, D, E	Overarching objective
Policy RCN2 New Sports and Recreational Facilities	2, 4	A, B, C, D, E	Overarching objective
Policy COM2 Broadband Provision	3	A,C,E	Overarching objective

APPENDIX 5

ARTICLE 4 DIRECTIONS

BUCKLAND

Covers the Buckland conservation area.

LAVERTON

Covers the Laverton conservation area.

GREENWAY HOTEL, SHURDINGTON

Covers land forming the curtilage of the Grade II Listed building Greenway Hotel and Lodge at Shurdington.

STANTON

Covers Stanton village and surrounding area.

TEWKESBURY

Covers most of the historic town centre in Tewkesbury.

WINCHCOMBE

Covers most of the historic town centre in Winchcombe.

DEERHURST

Covers land adjacent to the disused Coombe Hill Canal.

OXENTON

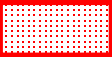





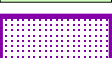

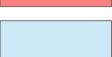















Covers land at Hill Farm, Oxenton.

AGGS HILL, SOUTHAM

Covers land at Piccadilly Farm and Noverton Farm at Aggs Hill in Southam Parish.

Map Legend

Preferred Options Tewkesbury Borough Plan

-  RES1 Housing Site Allocations
-  RES2 Settlement Boundaries
-  GTTS1 Site Allocations for Gypsies & Travellers
-  EMP1 Existing Major Employment Site
-  EMP1 New Major Employment Site
-  EMP2 Existing Rural Business Centres
-  EMP2 New Rural Business Centres
-  GRB1 Green Belt
-  JCS Strategic Allocations (Policy JCS SA1)
-  JCS Safeguarded Land (JCS Policy SD5)
-  GRB2 Gloucestershire Airport Non-Essential Operational Area
-  Gloucestershire Airport Essential Operational Area (JCS Policy SD5)
-  GRB3 - Bamfurlong Operational Policing Site
-  RET2 Tewkesbury Town Primary Frontages
-  RET2 Tewkesbury Town Centre Boundary
-  RET3 Retail Centres
-  RET9 Tewkesbury Town Regeneration Sites
-  HER1 Conservation Areas
-  HER3 Historic Parks & Gardens
-  HER4 - Scheduled Ancient Monuments
-  HER6 Tewkesbury (1471) Historic Battlefield
-  Cotswolds AONB (JCS Policy SD7)
-  LAN1 Special Landscape Areas
-  LAN2 Landscape Protection Zone
-  LAN3 Strategic Gaps
-  LAN4 Locally Important Open Spaces
-  LAN5 Local Green Space
-  Article 4 Direction Boundary
-  Existing development with planning permission

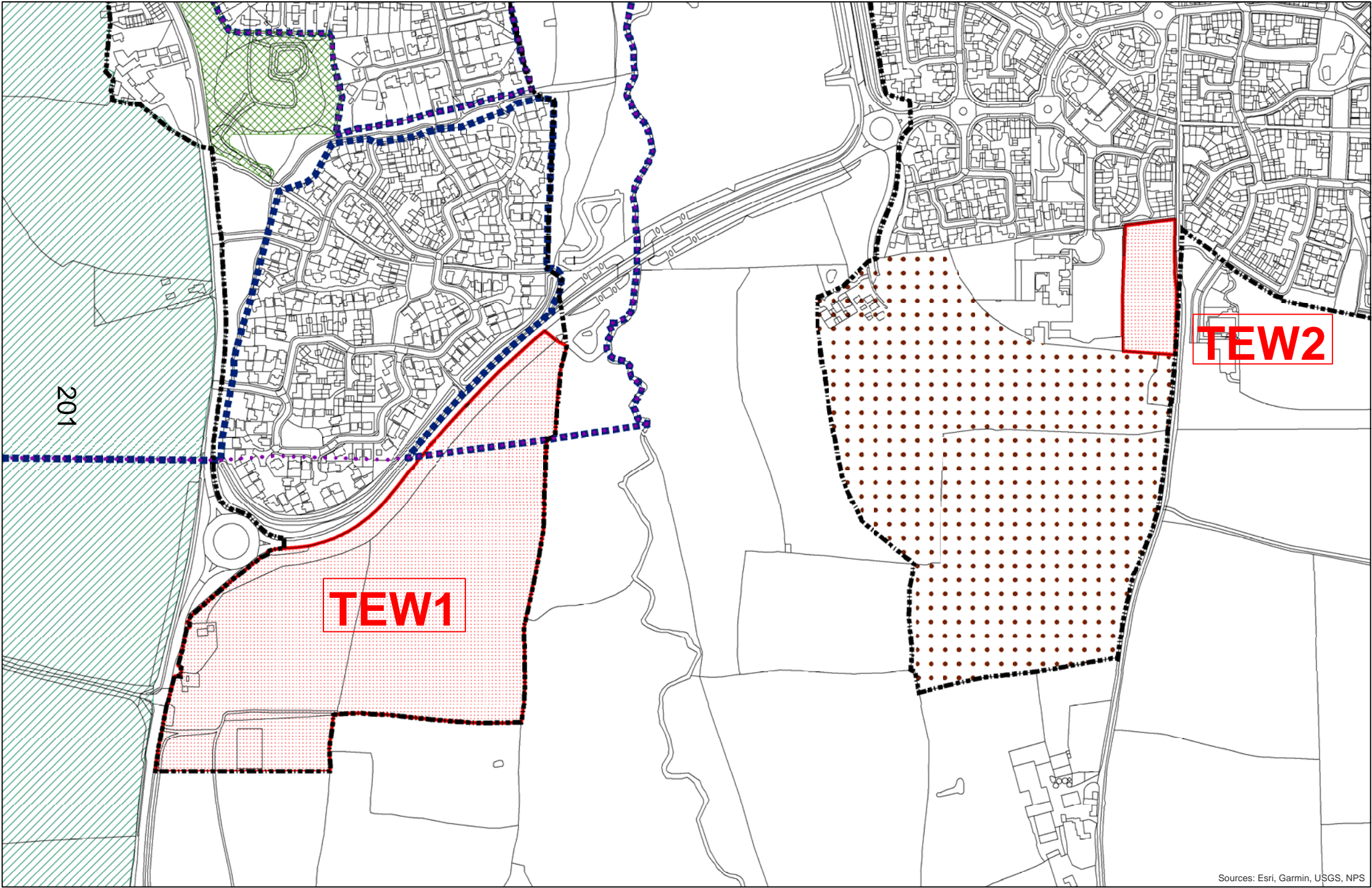
HOUSING MAPS

Policy RES1 – Housing Allocations

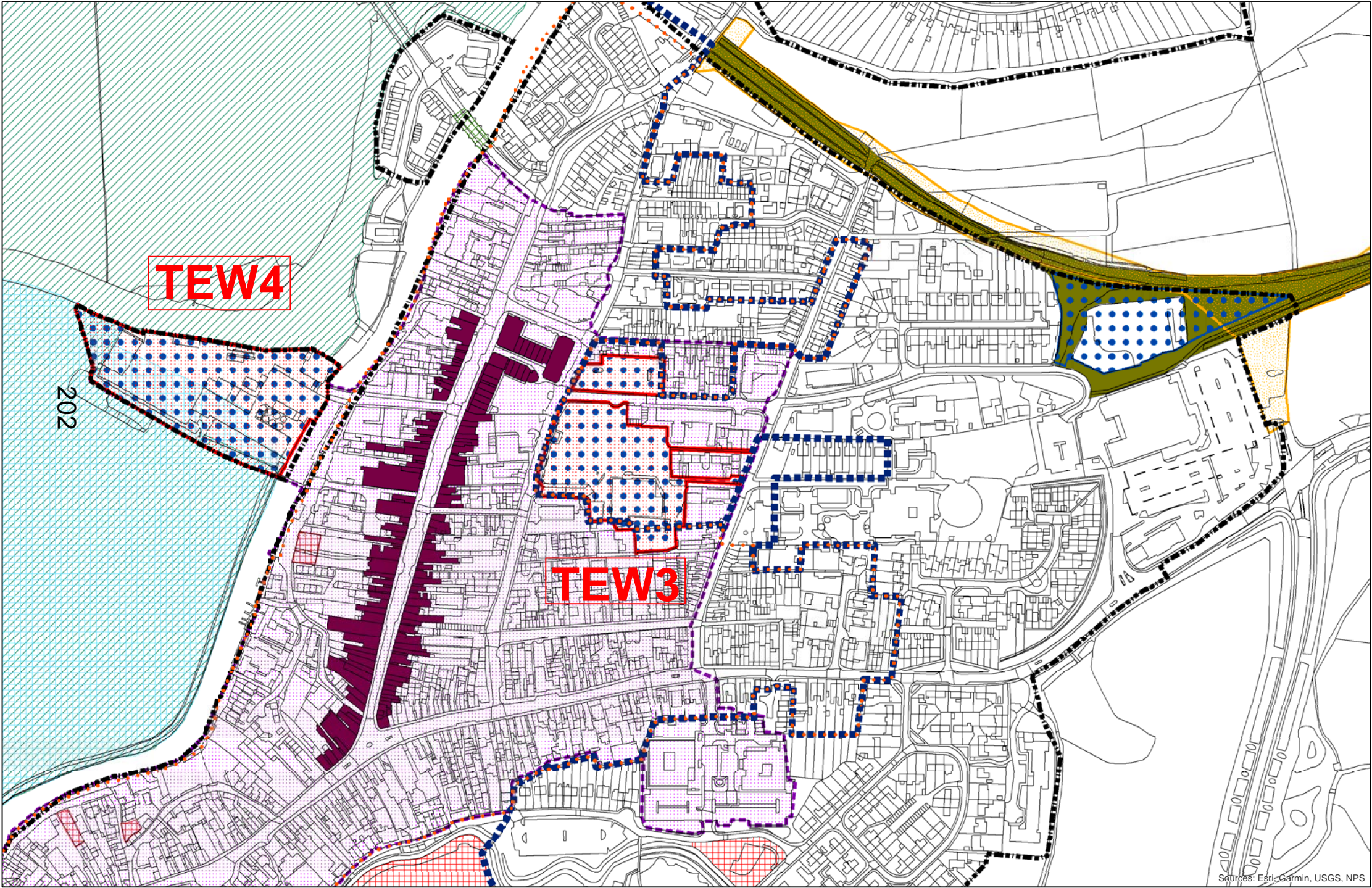
Policy RES2 – Settlement Boundaries

Policy GTTS1 – Gypsy, Traveller and Travelling
Showpeople Allocations

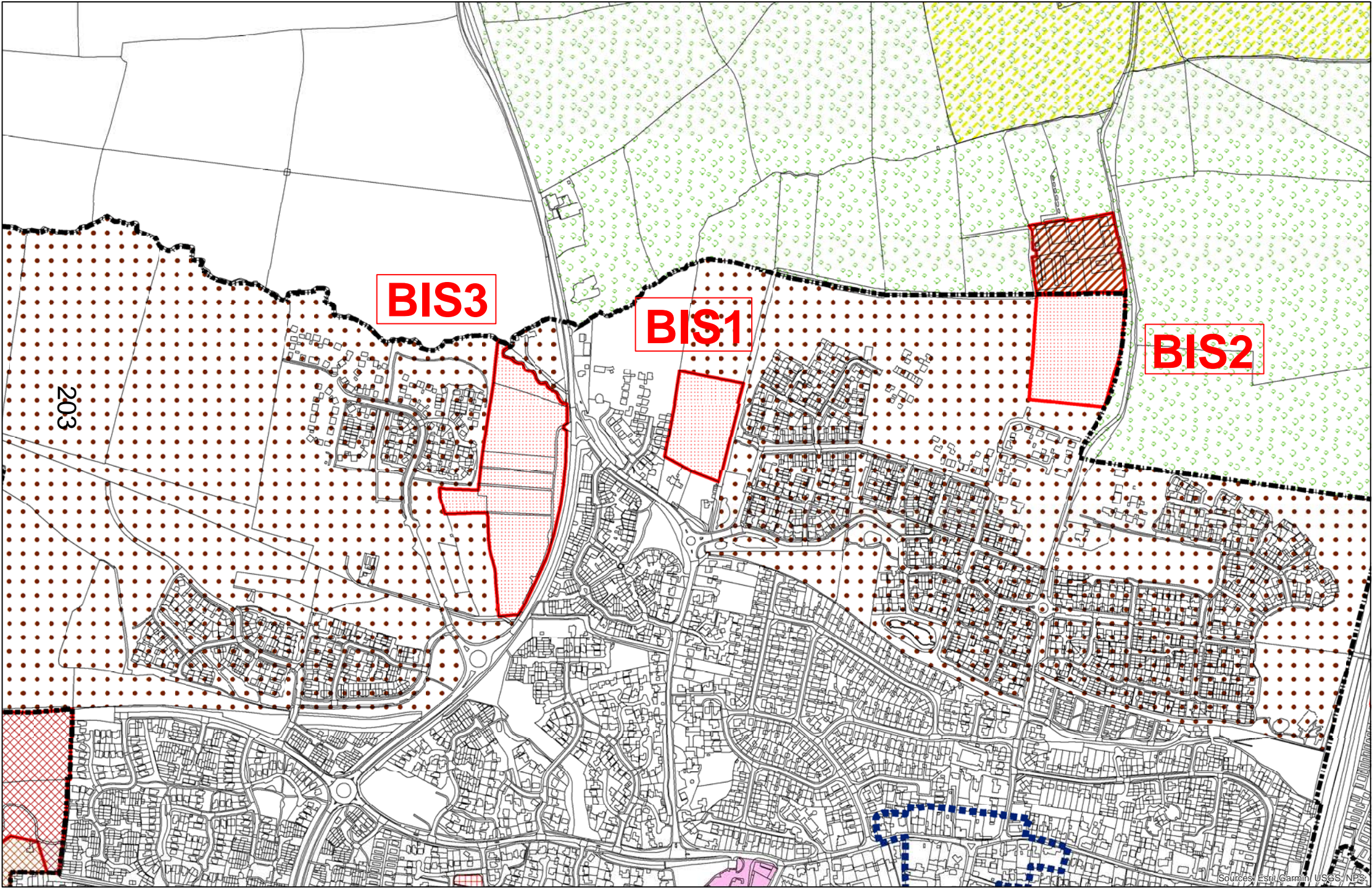
RES1 & RES2 - Tewkesbury Town South



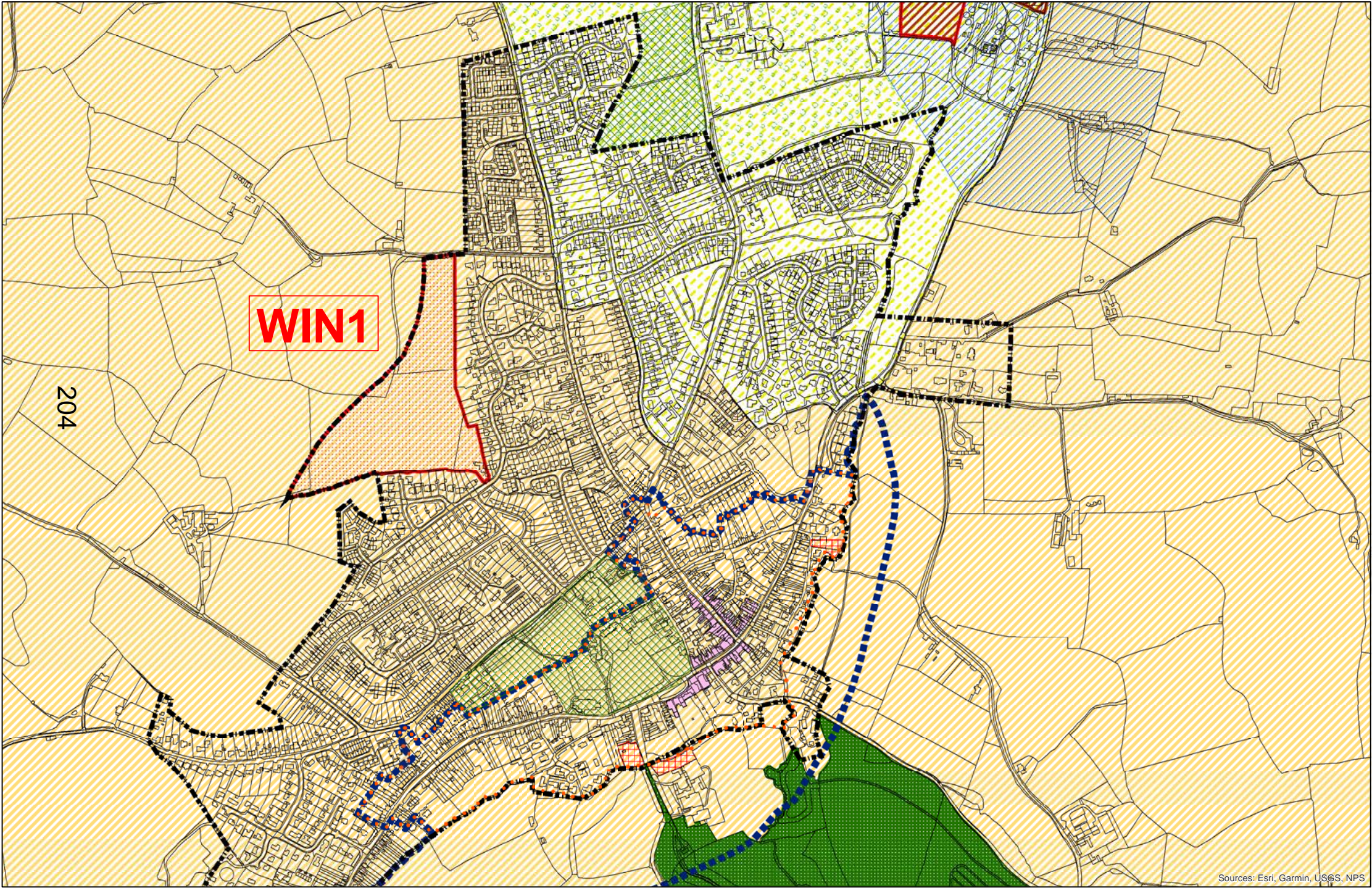
RES1 & RES2 - Tewkesbury Town North



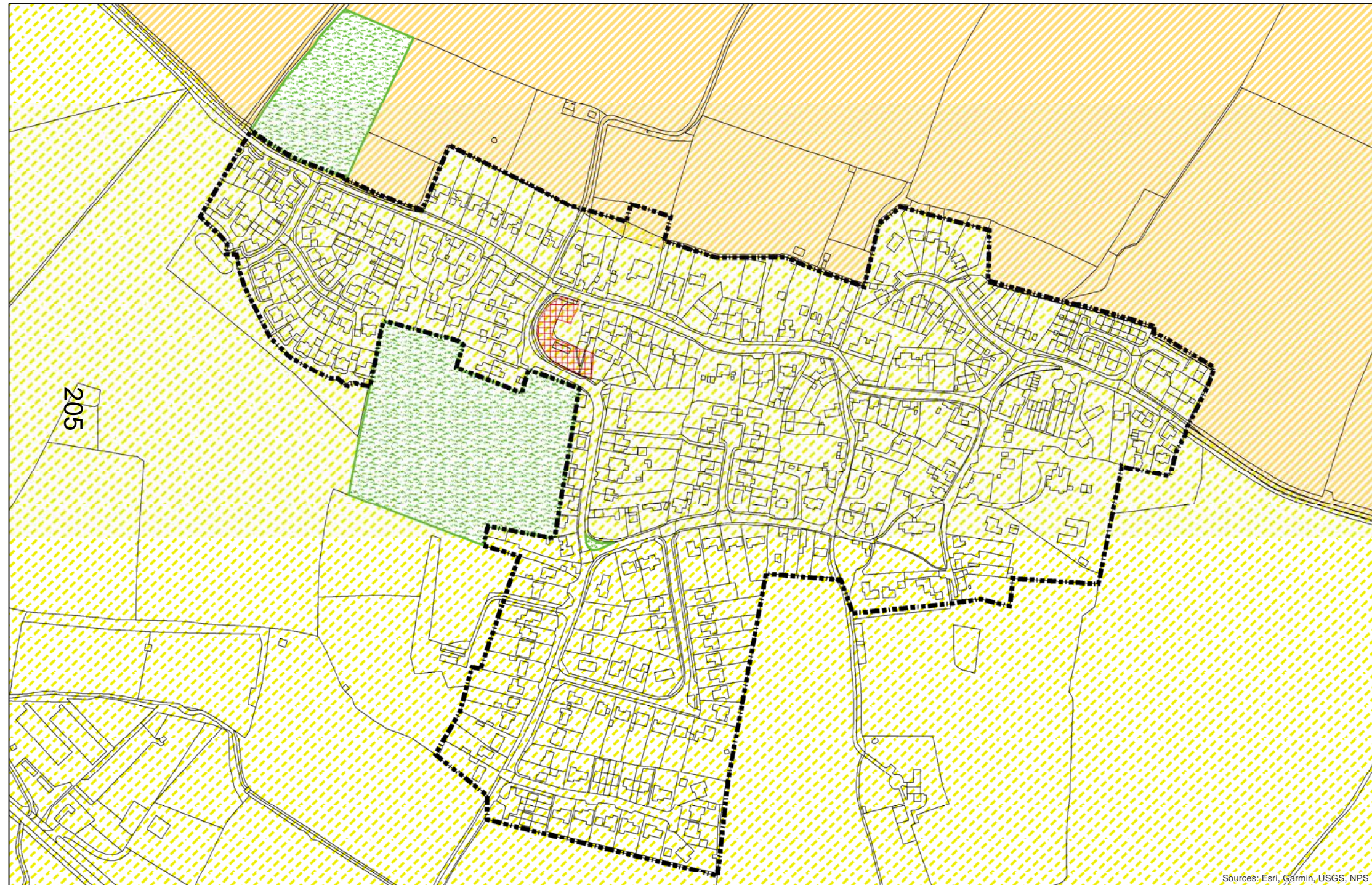
RES1 & RES2 - Bishop's Cleeve



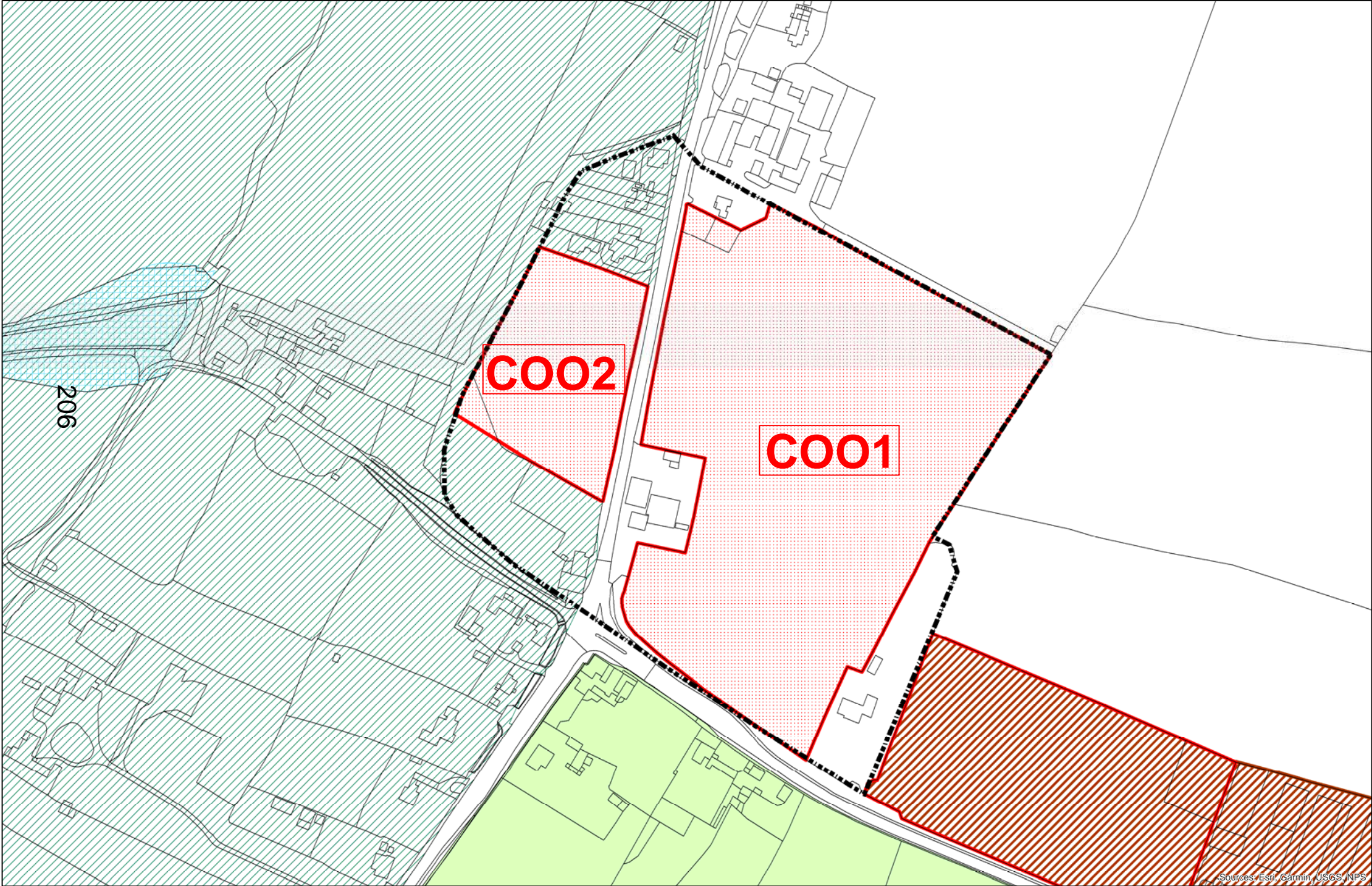
RES1 & RES2 - Winchcombe



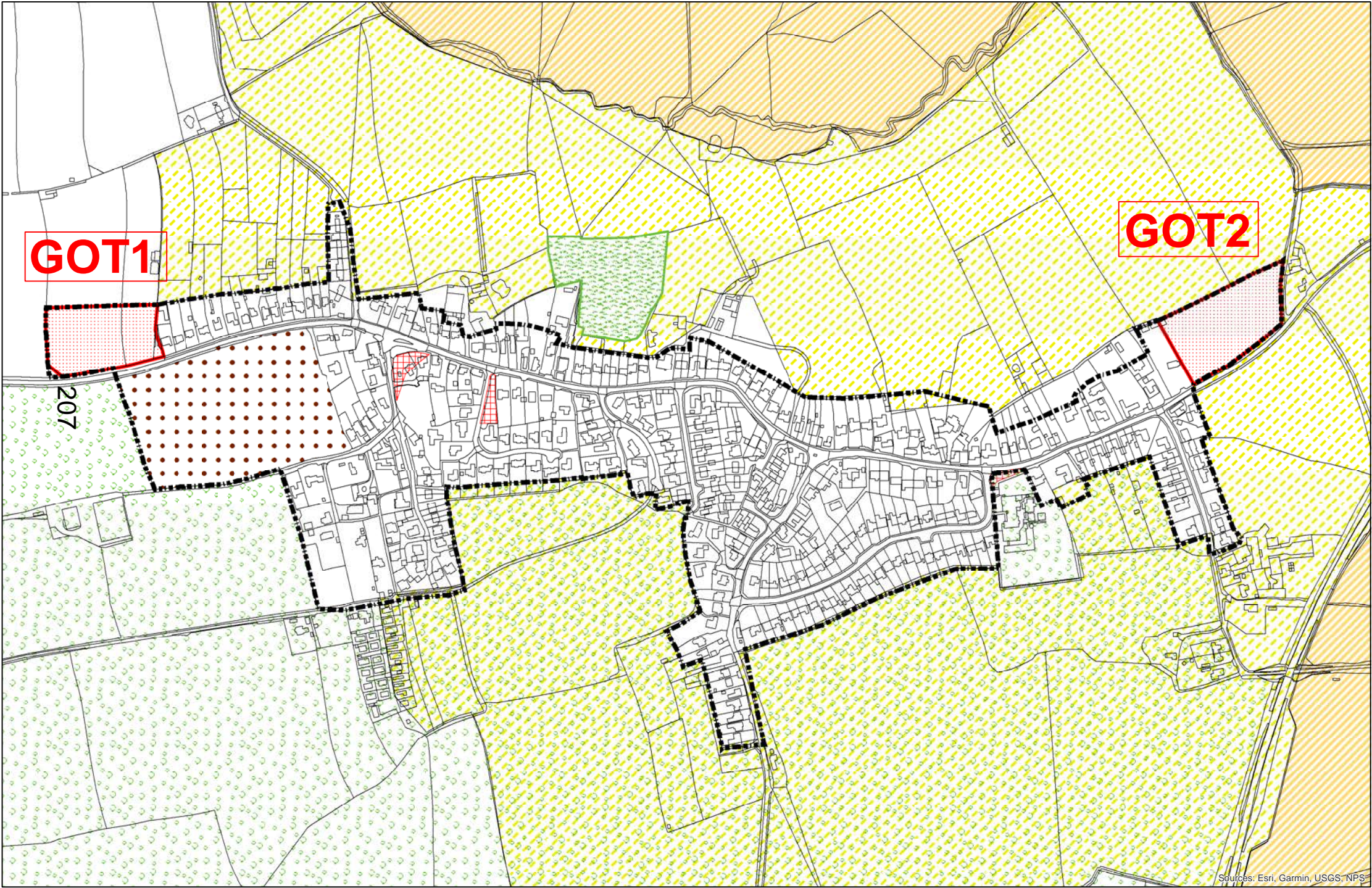
RES1 & RES2 - Alderton



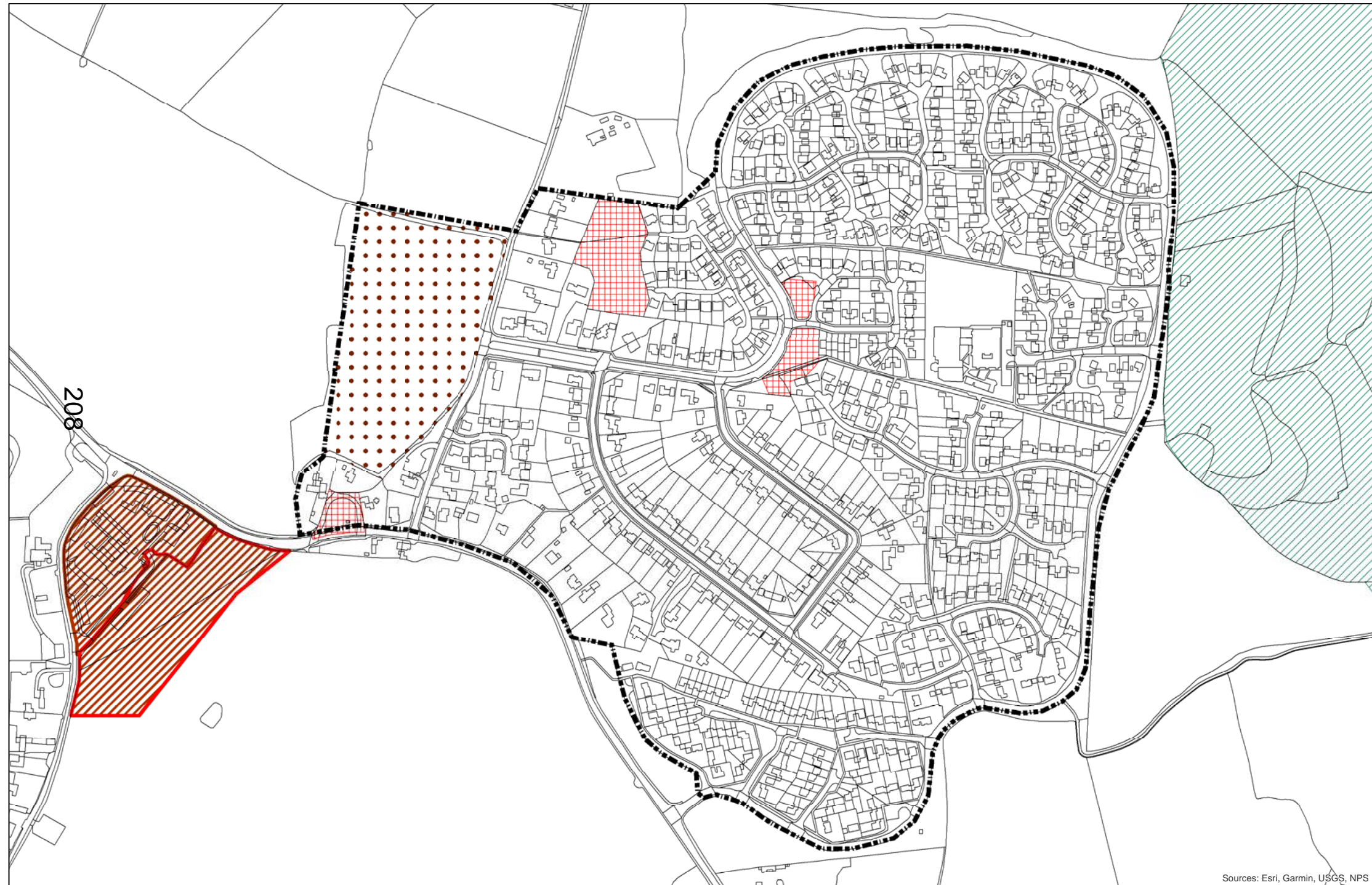
RES1 & RES2 - Coombe Hill



RES1 & RES2 - Gotherington



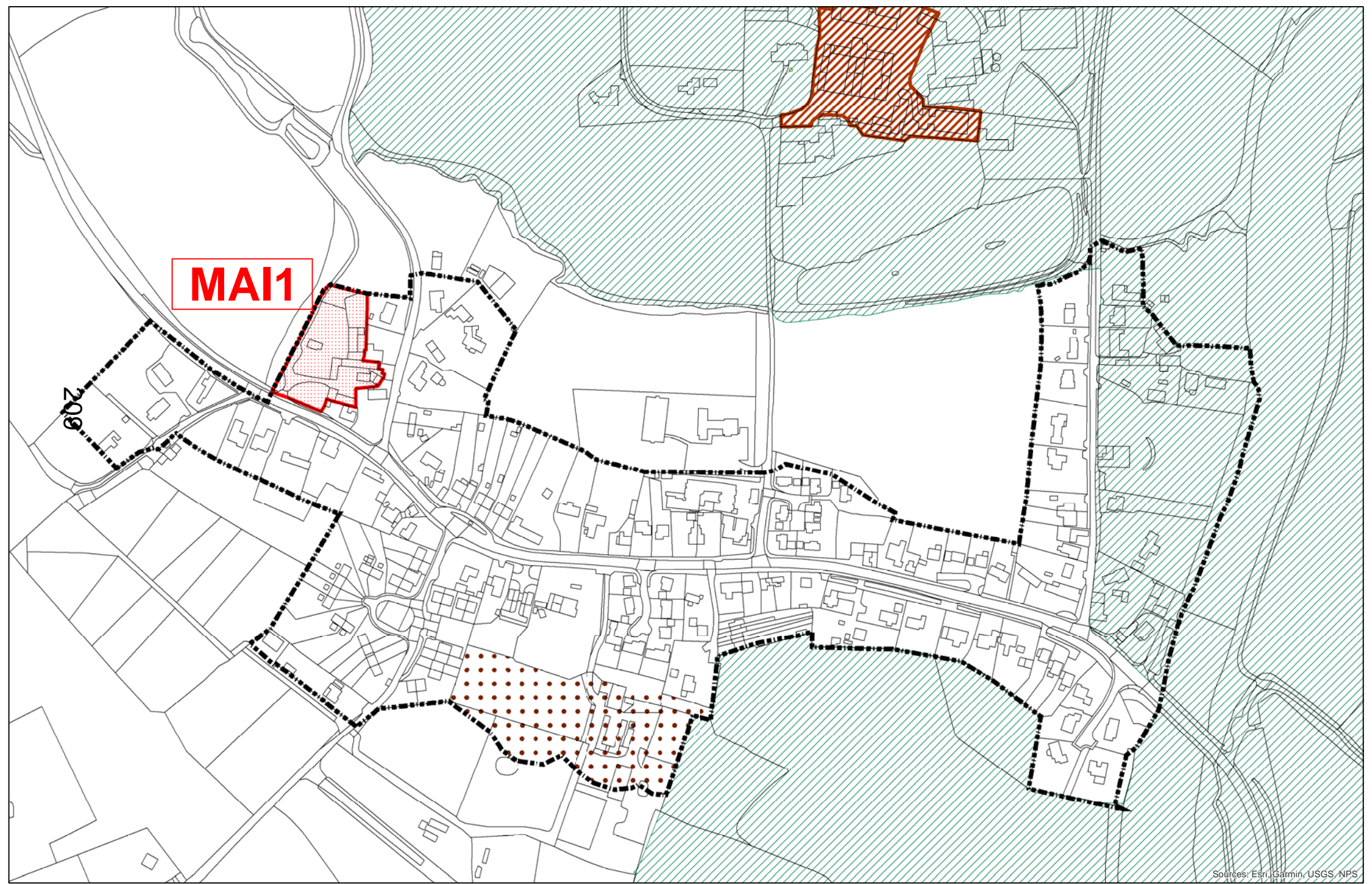
RES1 & RES2 - Highnam



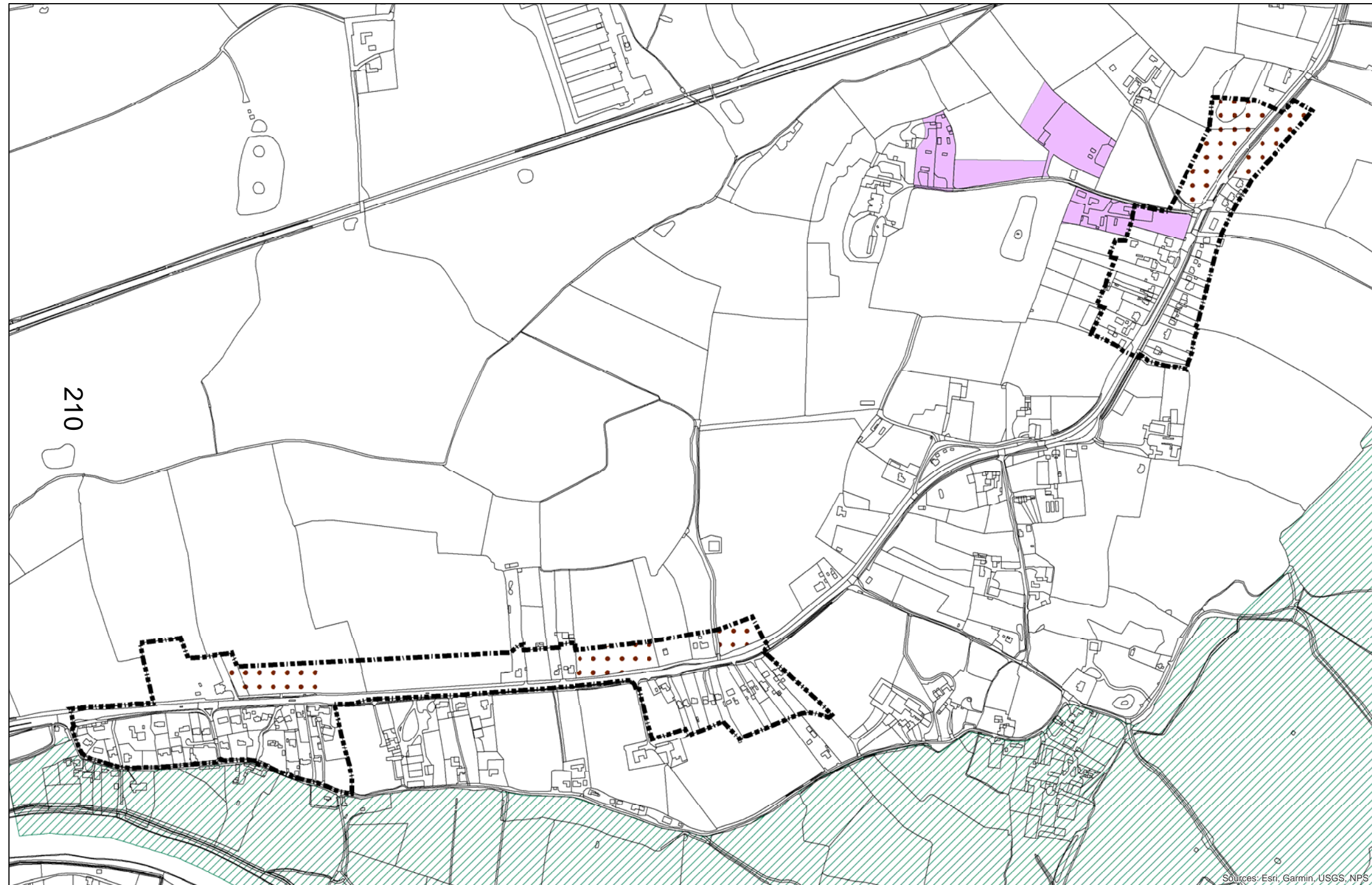
RES1 & RES2 - Maisemore

MAI1

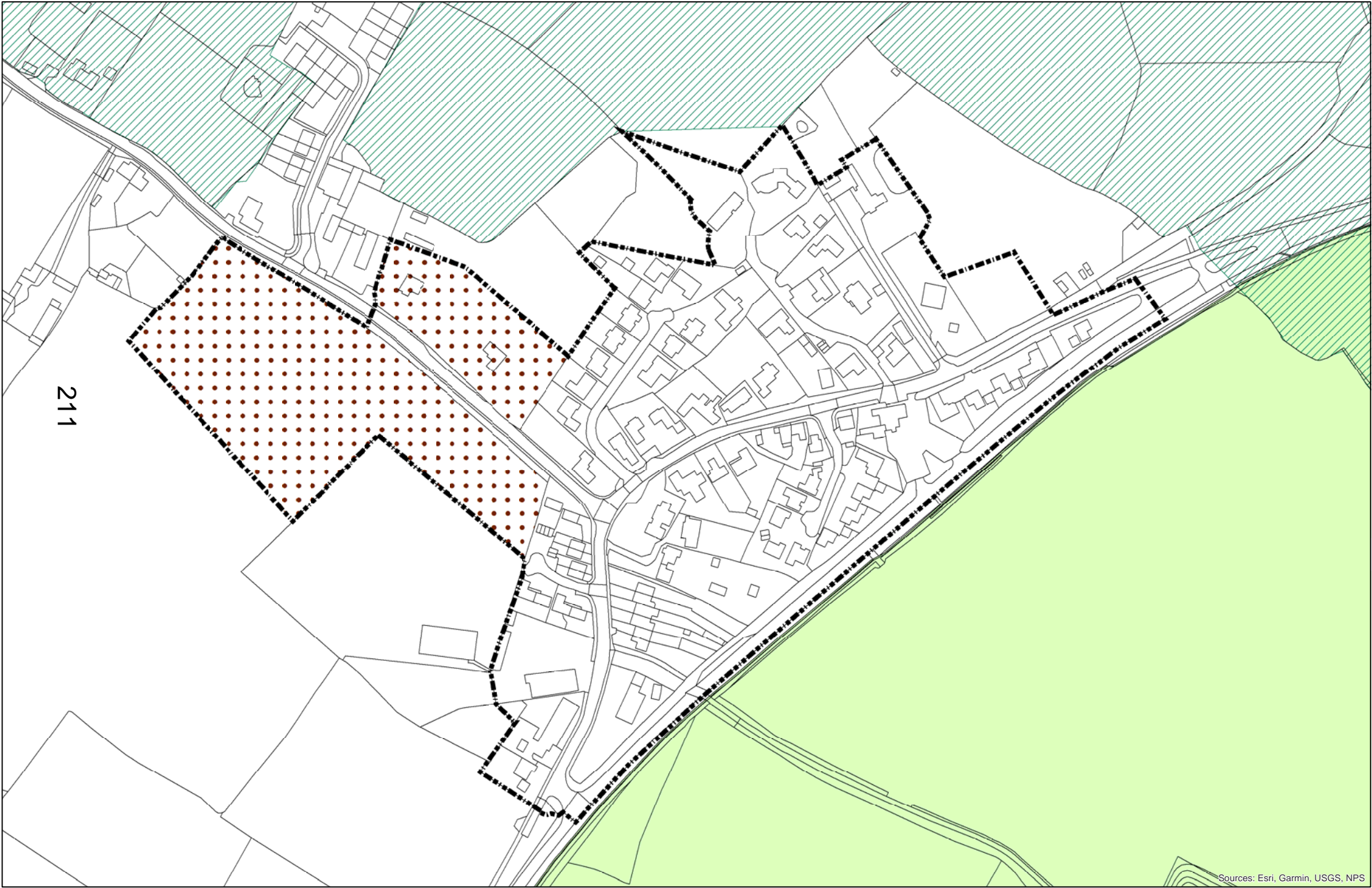
207



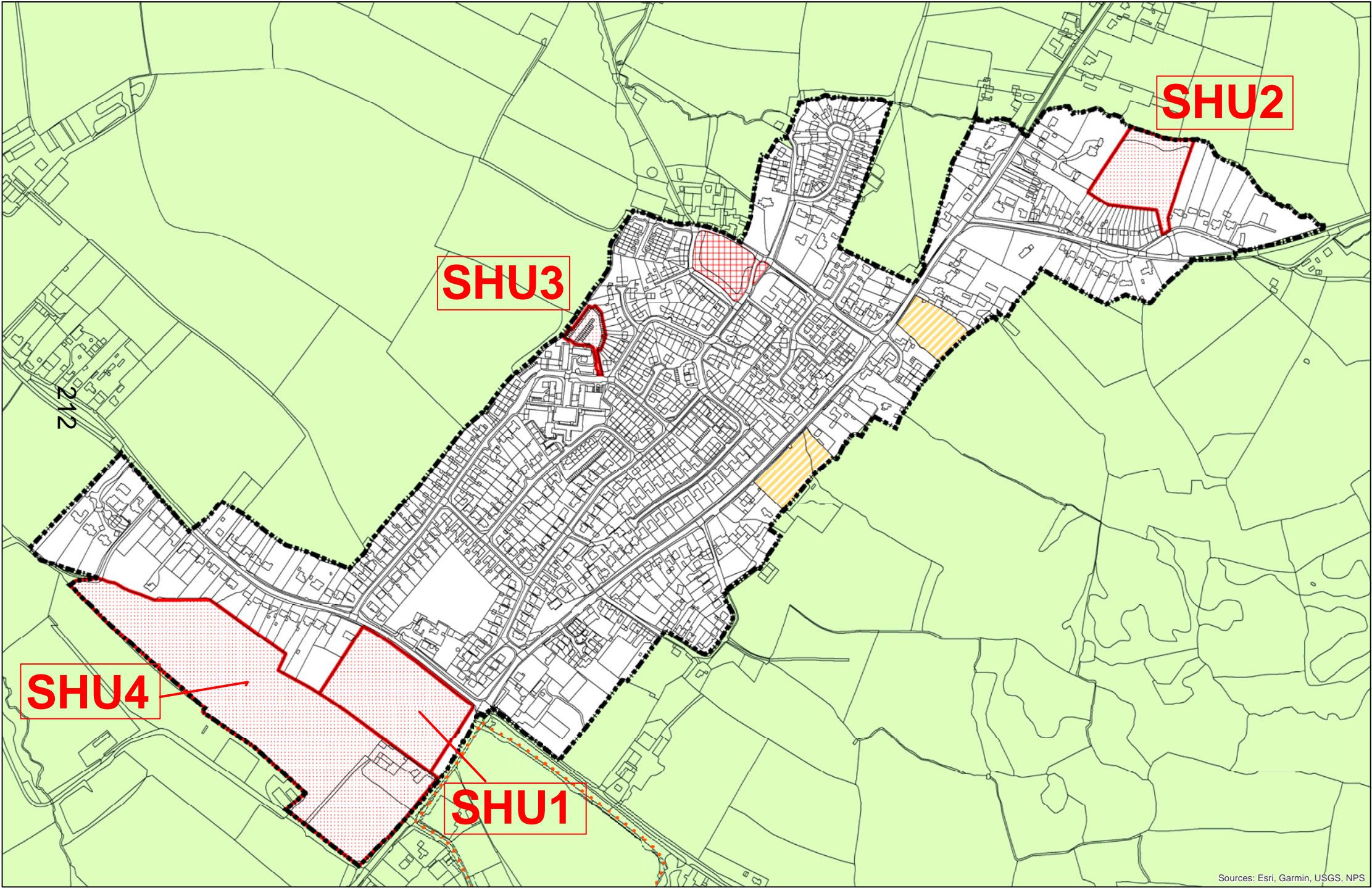
RES1 & RES2 - Minsterworth



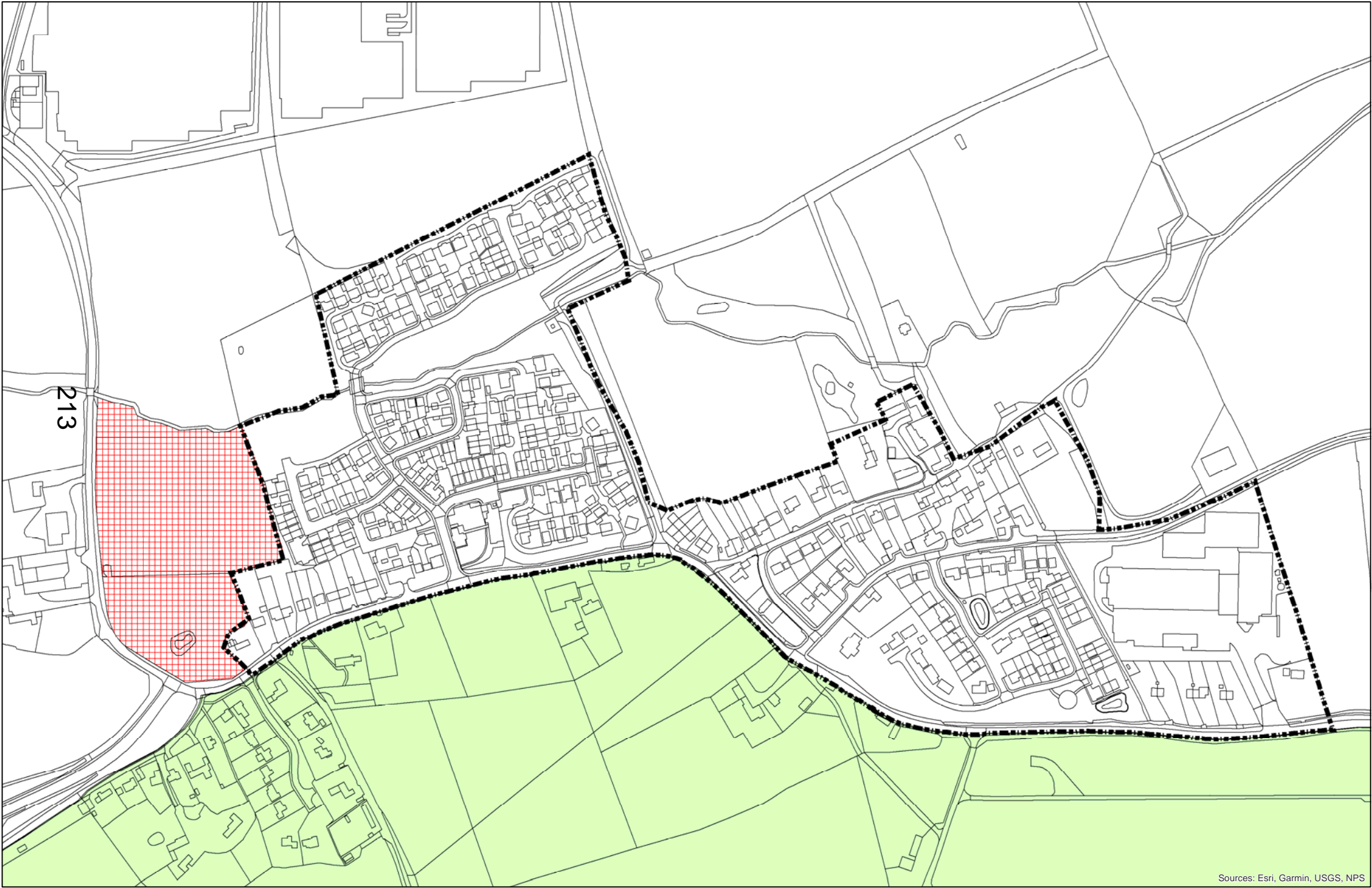
RES1 & RES2 - Norton



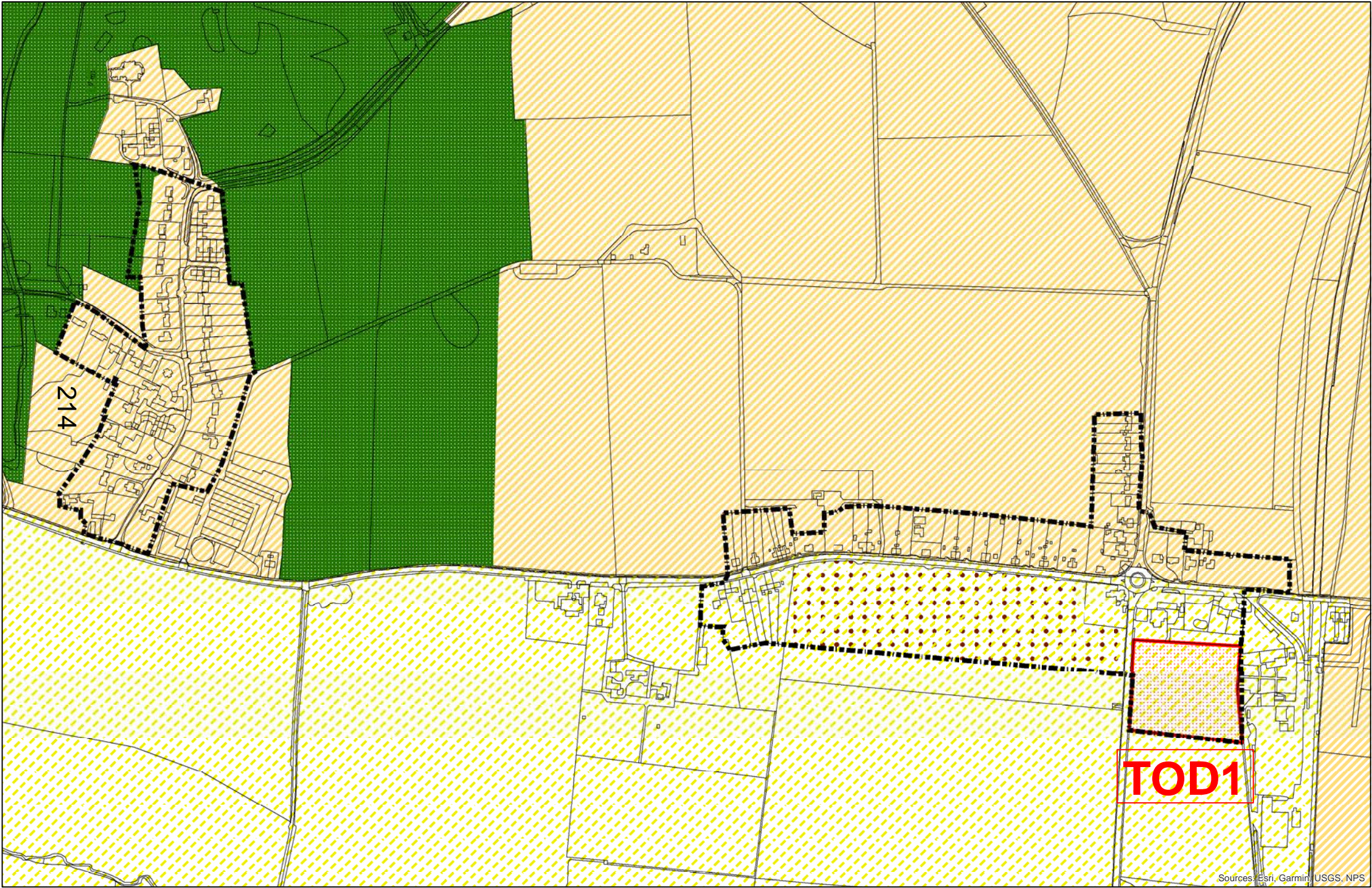
RES1 & RES2 - Shurdington



RES1 & RES2 - Stoke Orchard

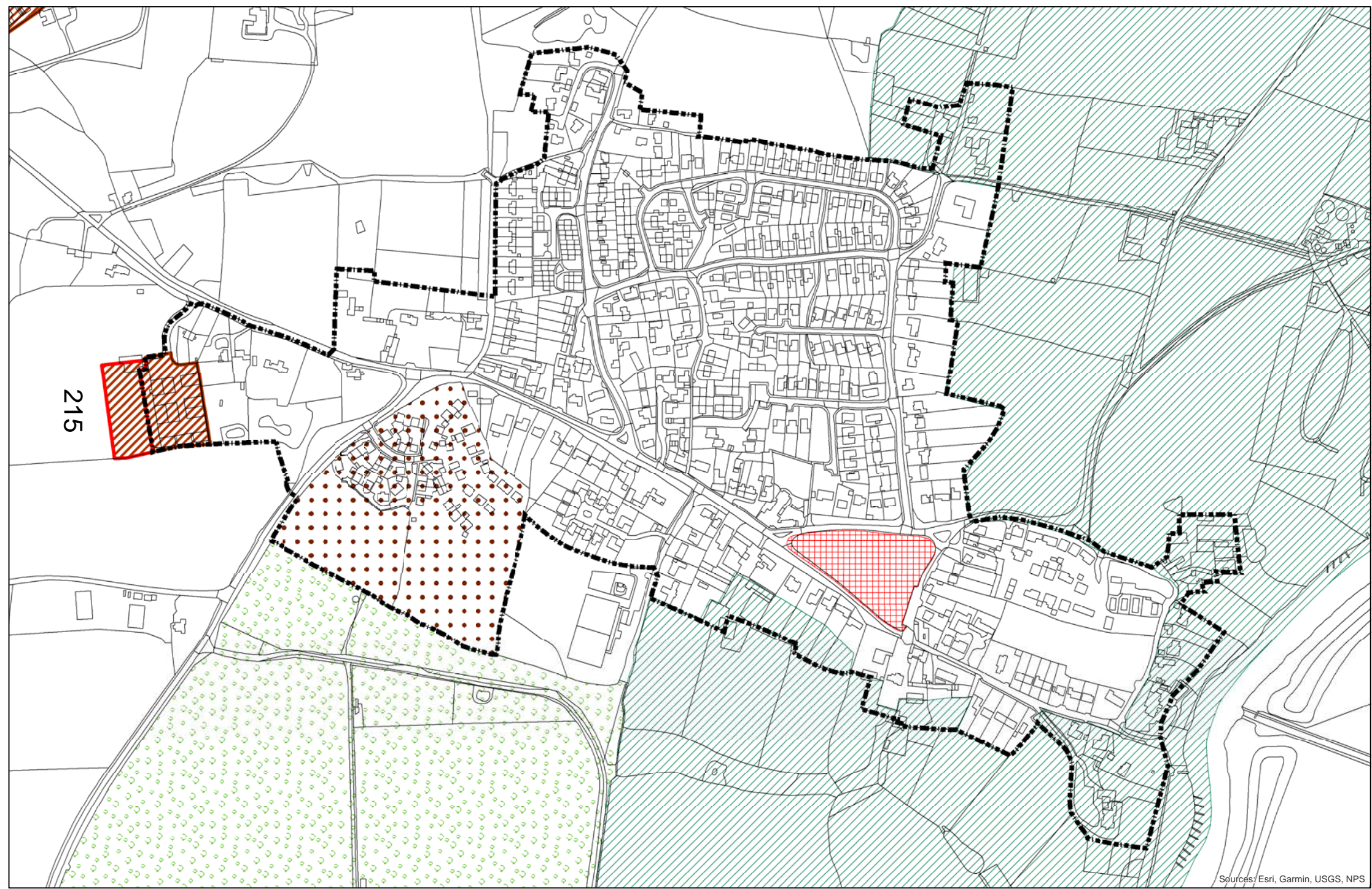


RES1 & RES2 - Toddington

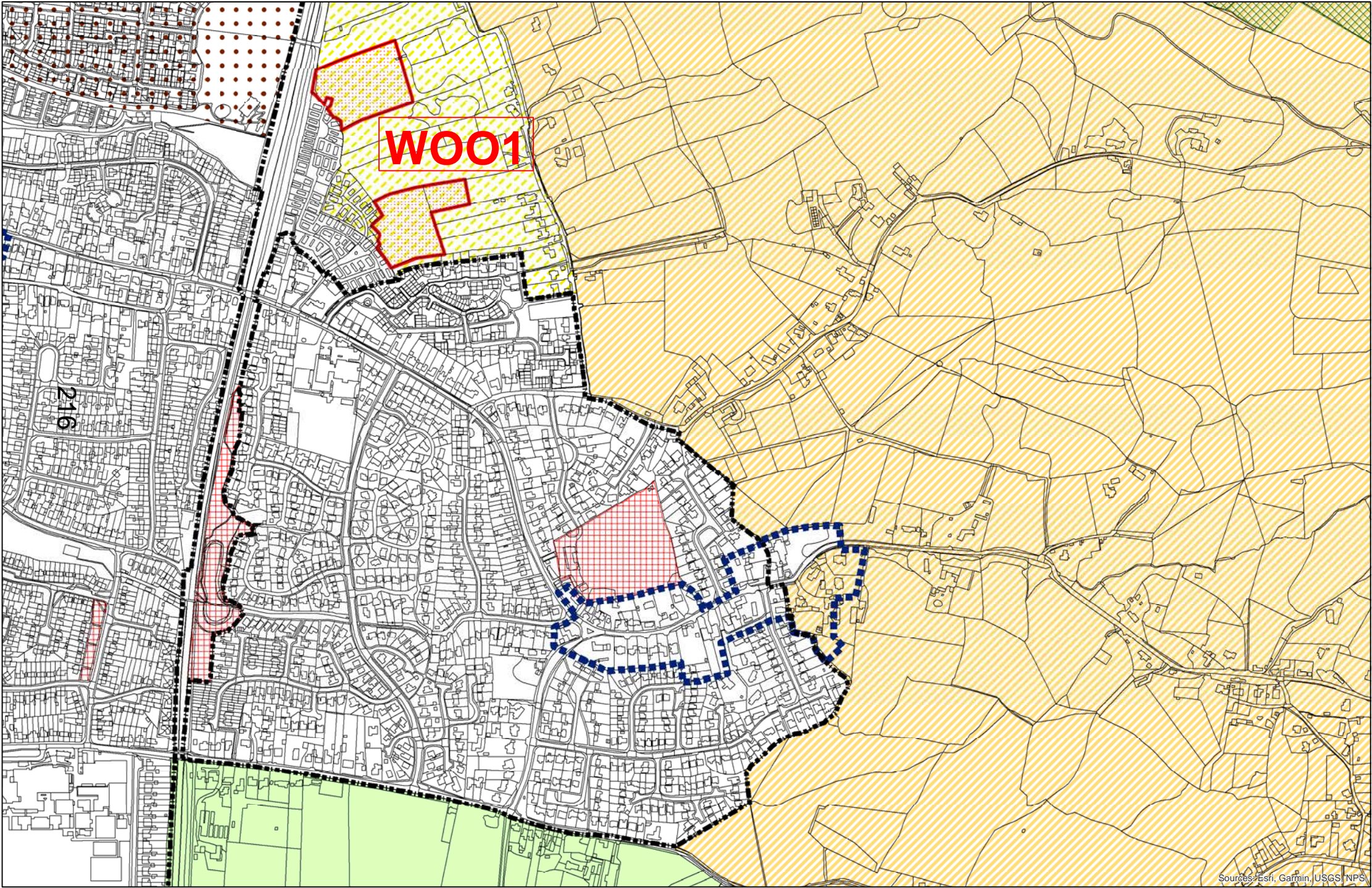


Sources: Esri, Garmin, USGS, NPS

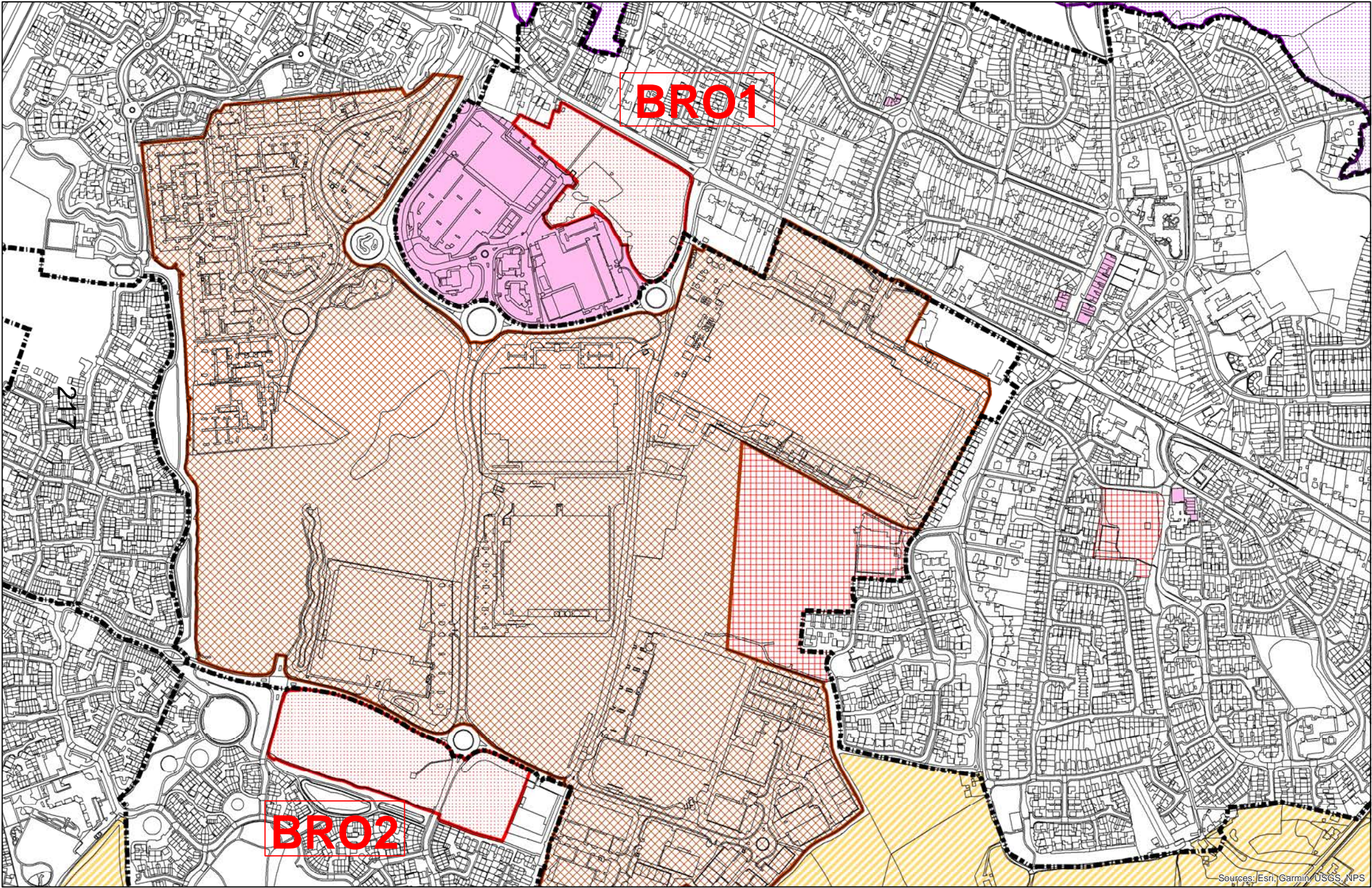
RES1 & RES2 - Twyning



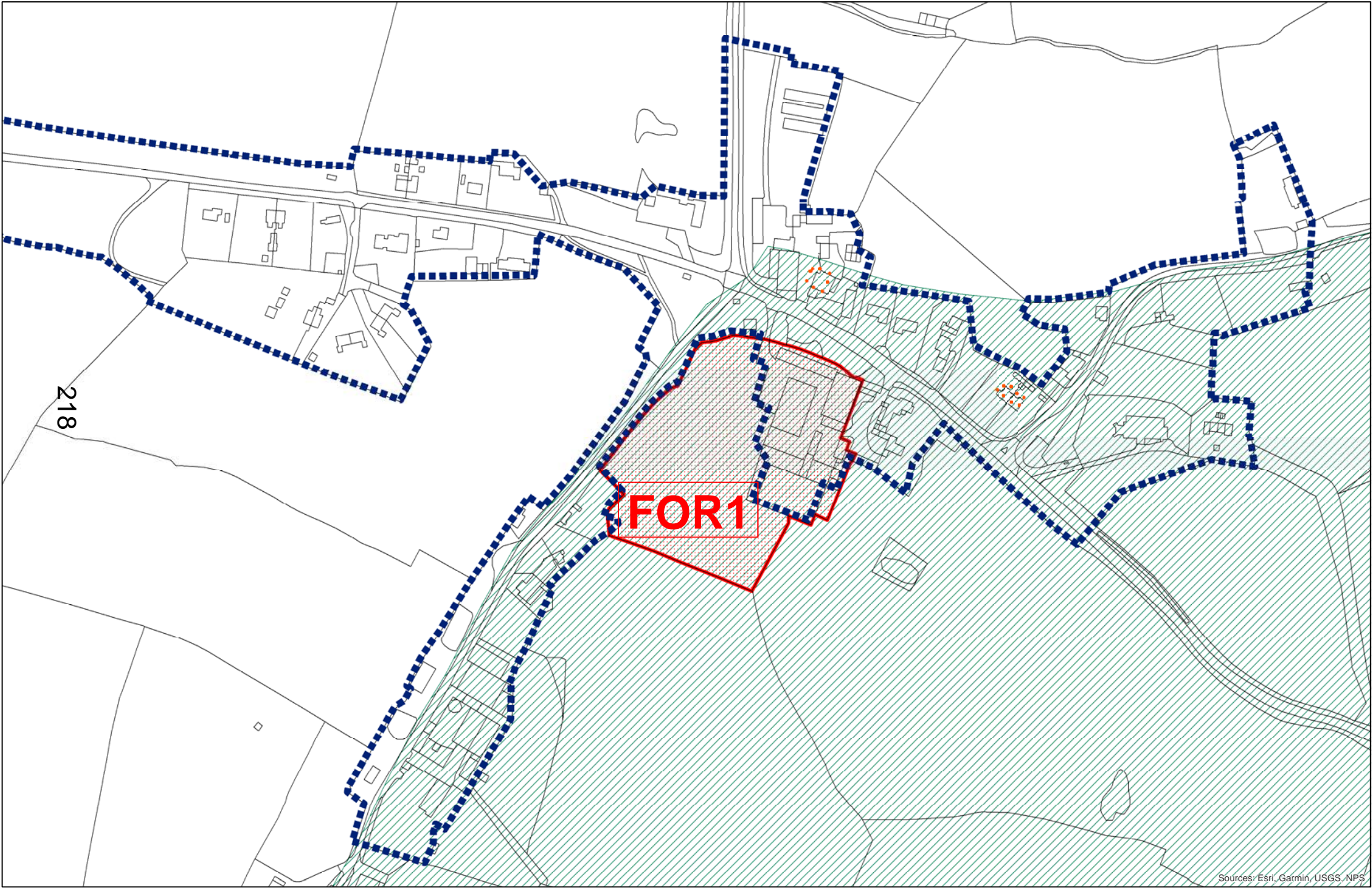
RES1 & RES2 - Woodmancote



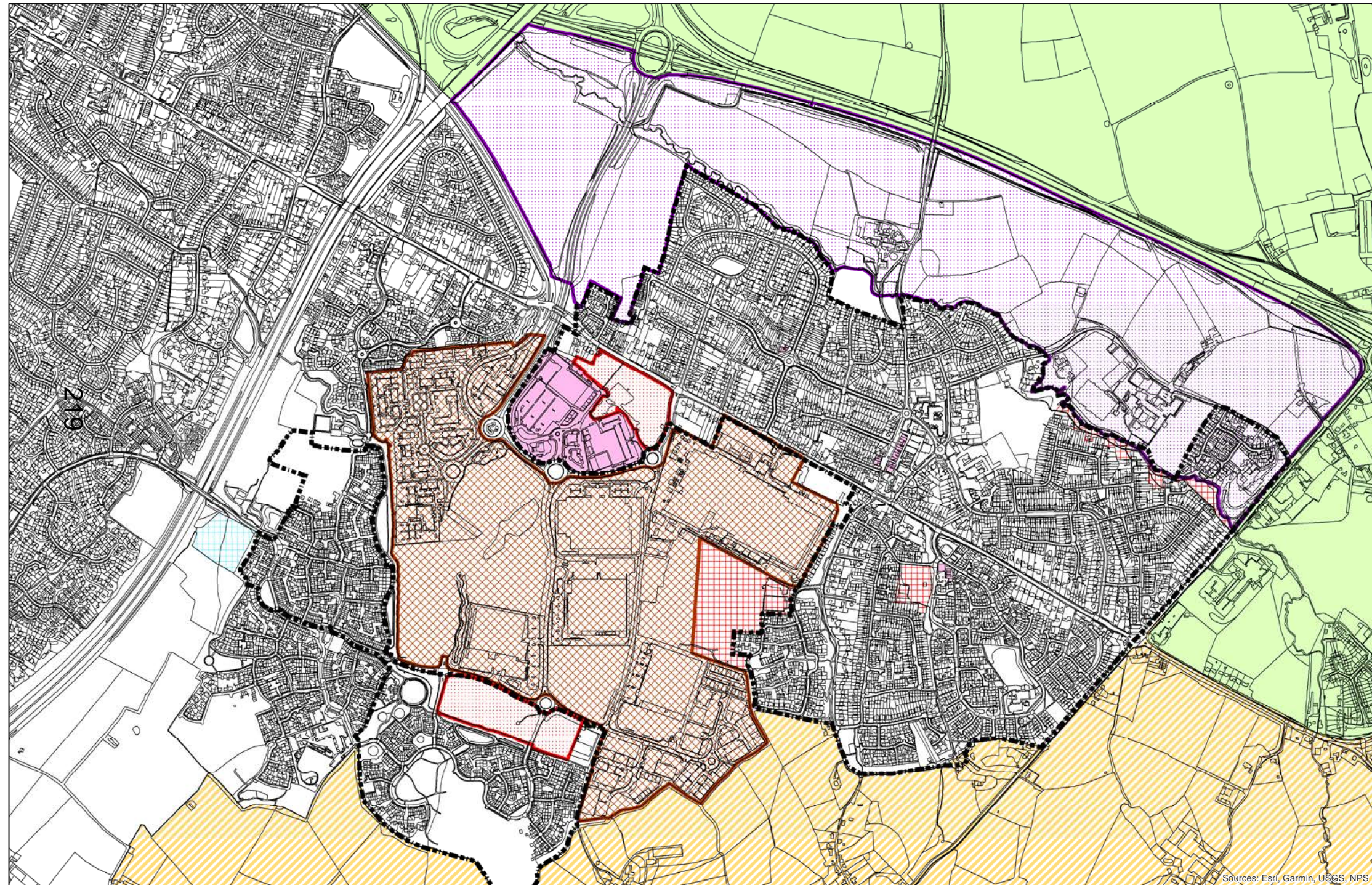
RES1 & RES2 - Brockworth



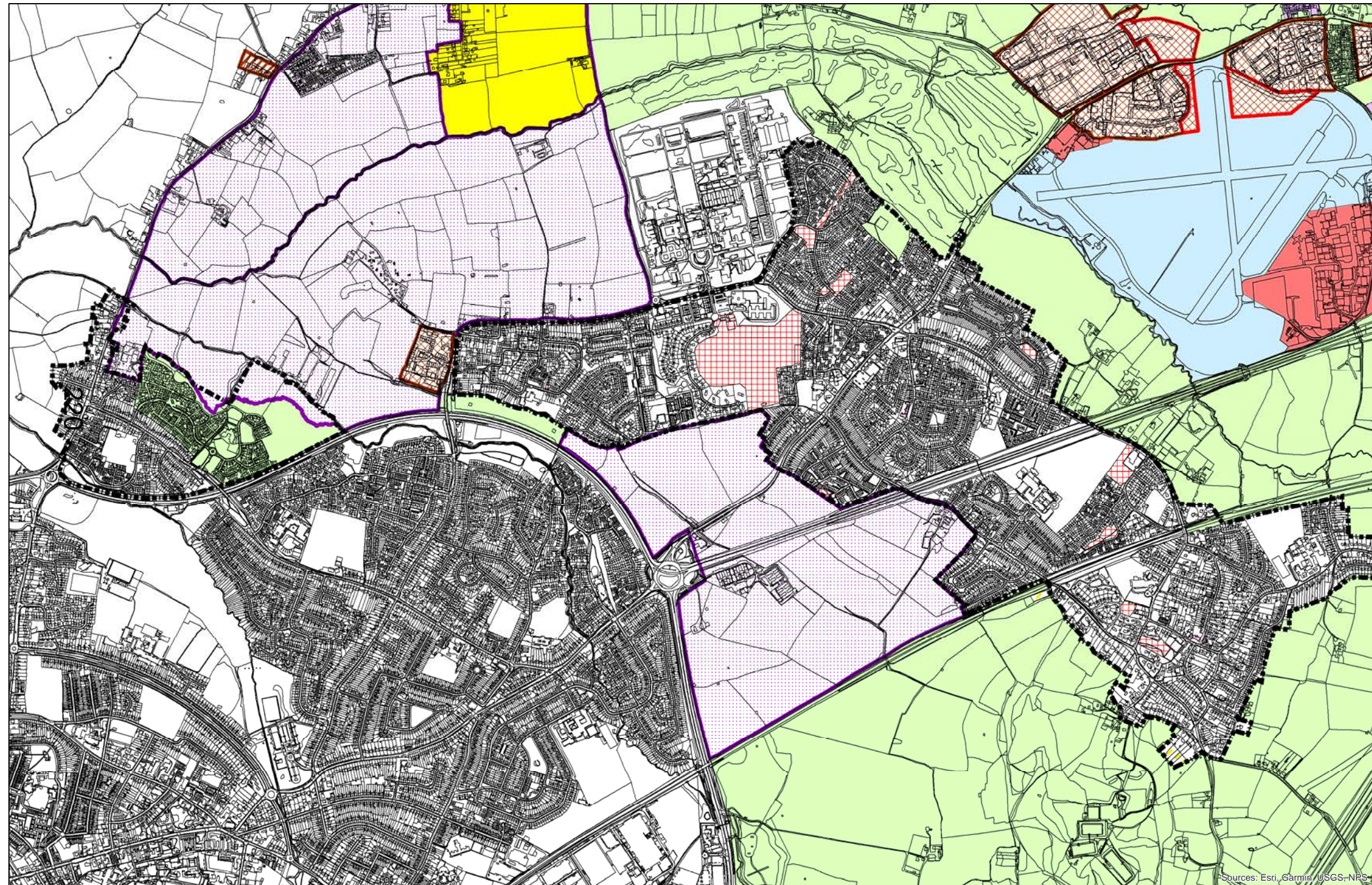
RES1 & RES2 - Forthampton



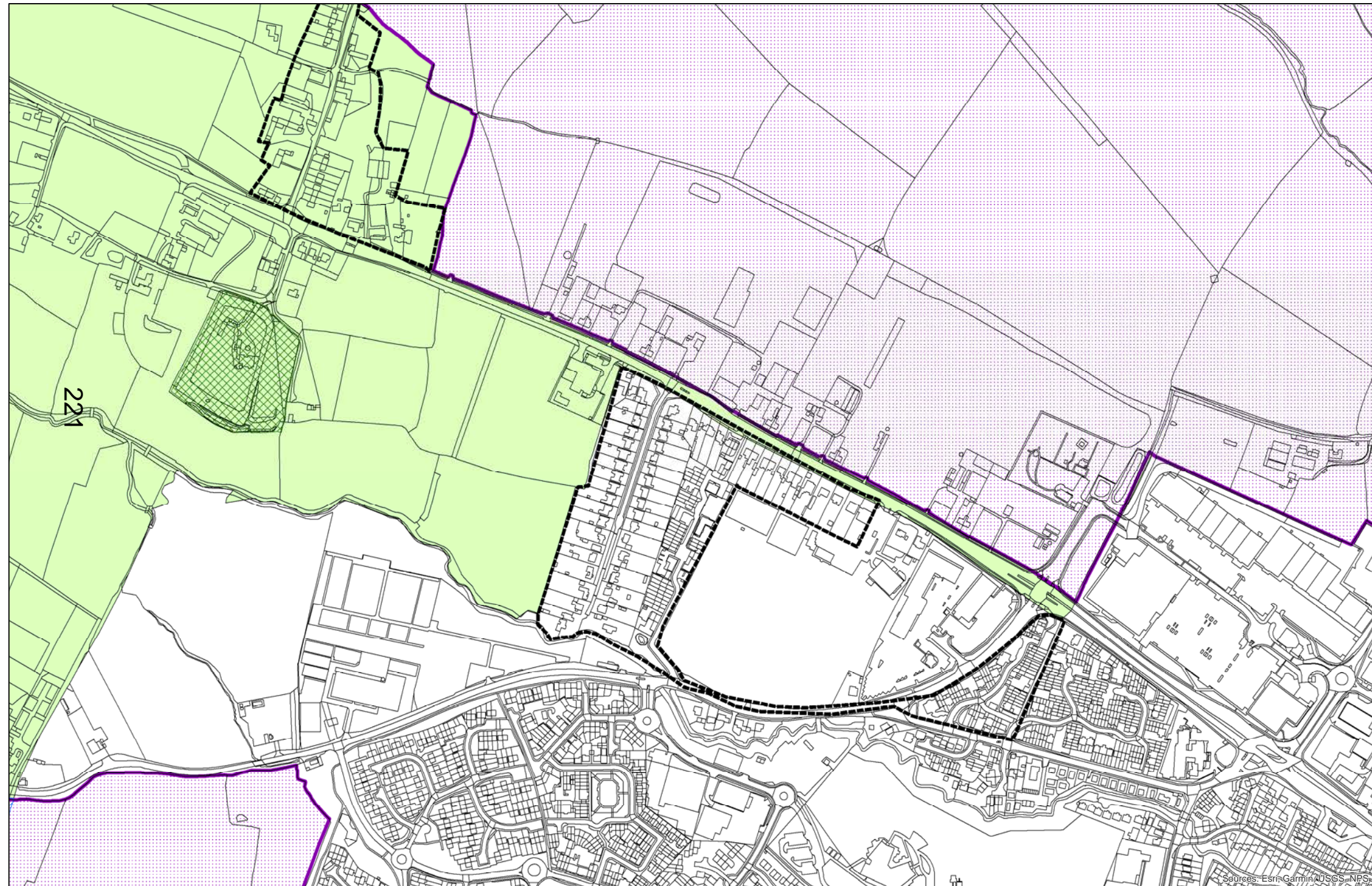
RES2 - Brockworth & Hucclecote



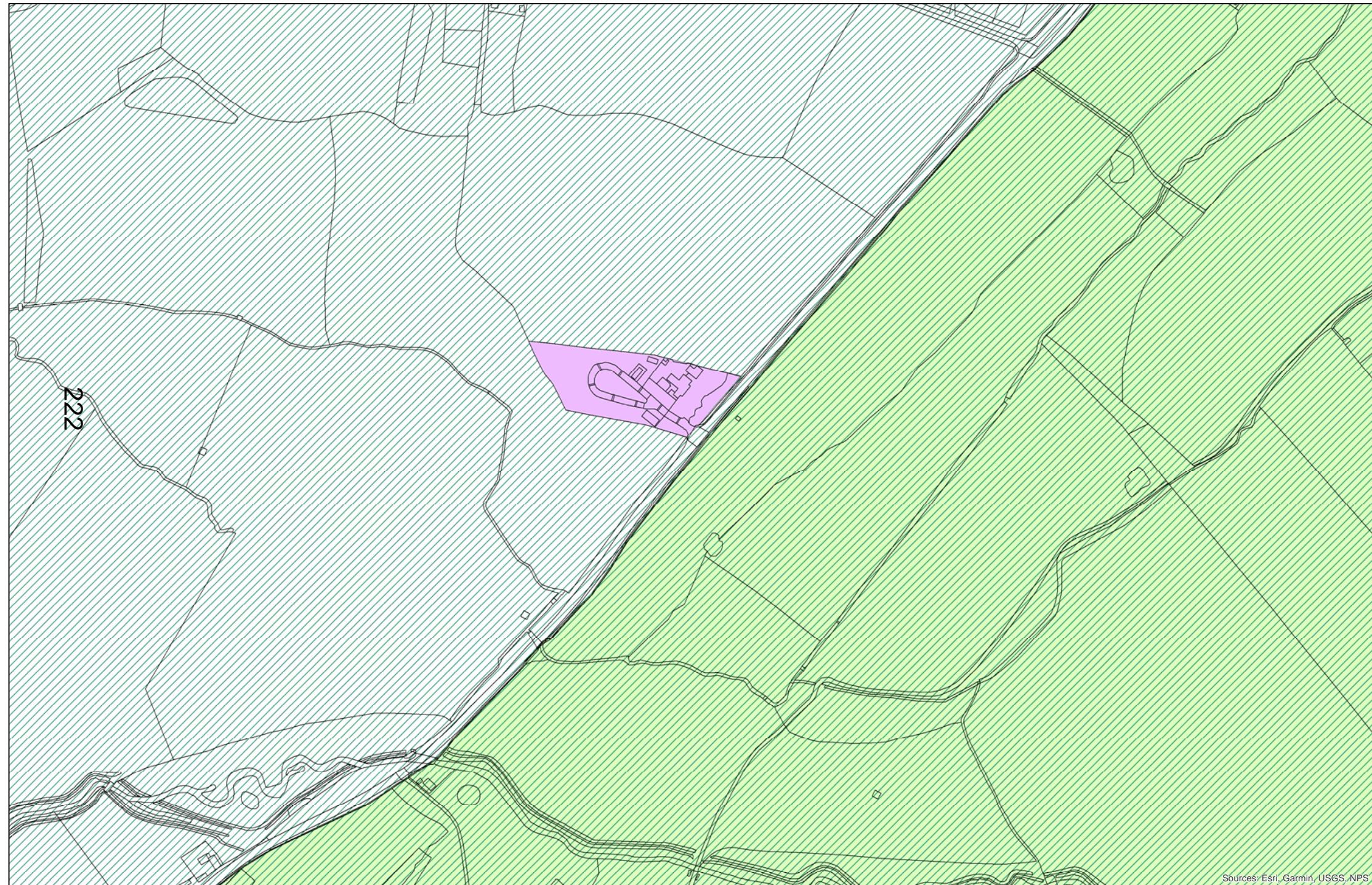
RES2 - Churchdown, Innsworth & Longford



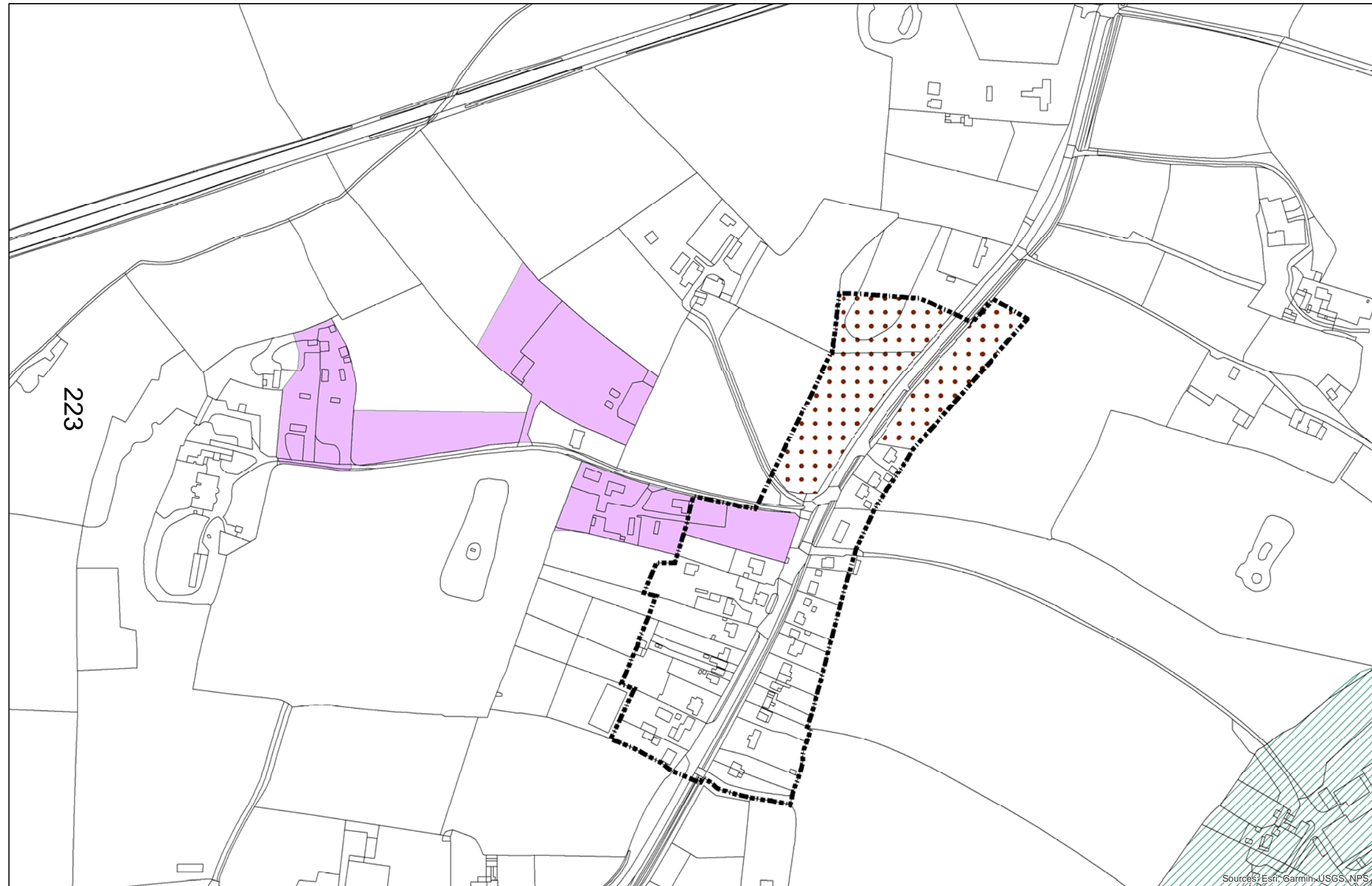
RES2 - Uckington



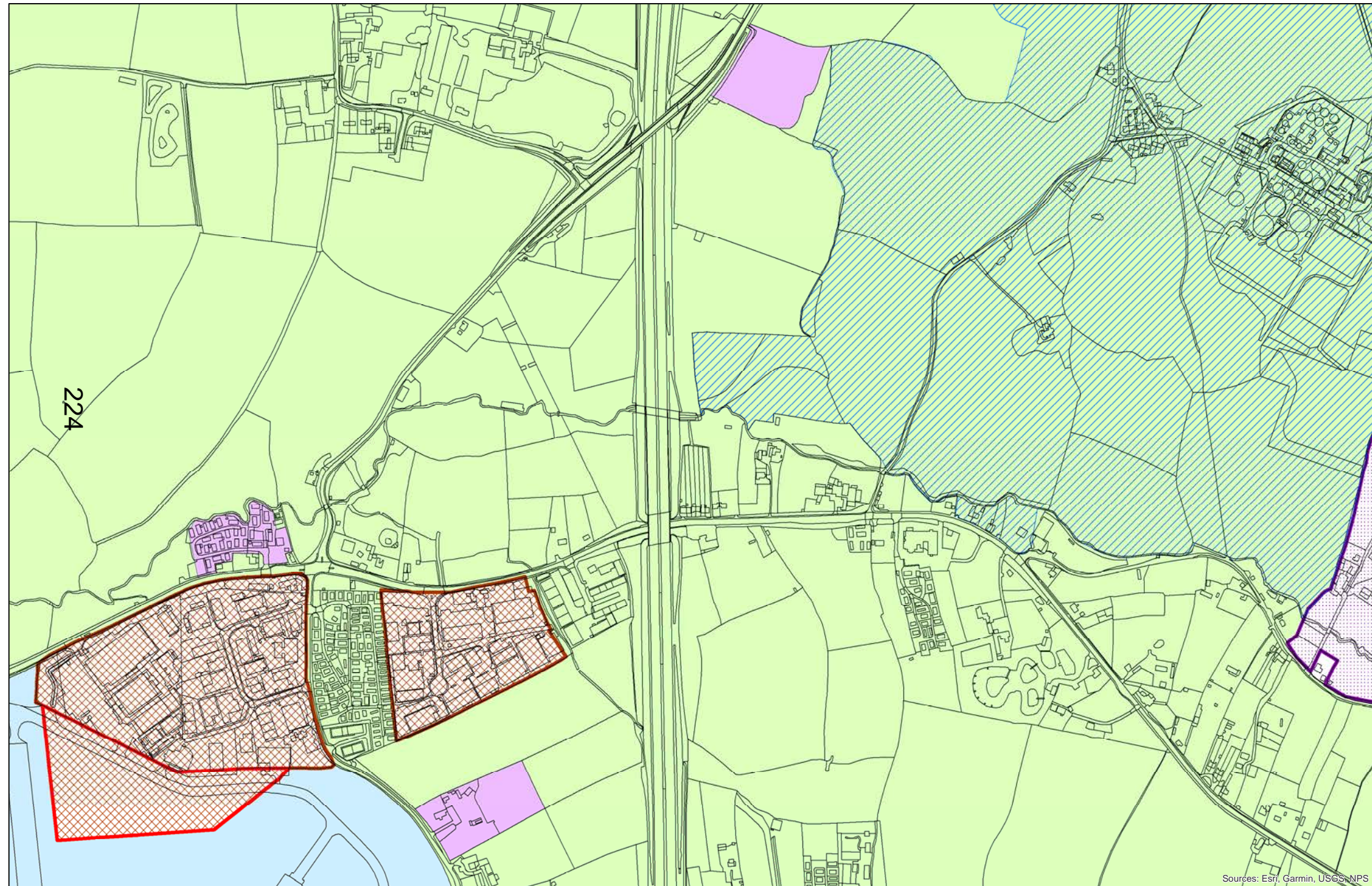
GTTS1 - The Leigh



GTTS1 - Minsterworth



GTTS1 - Staverton



EMPLOYMENT MAPS

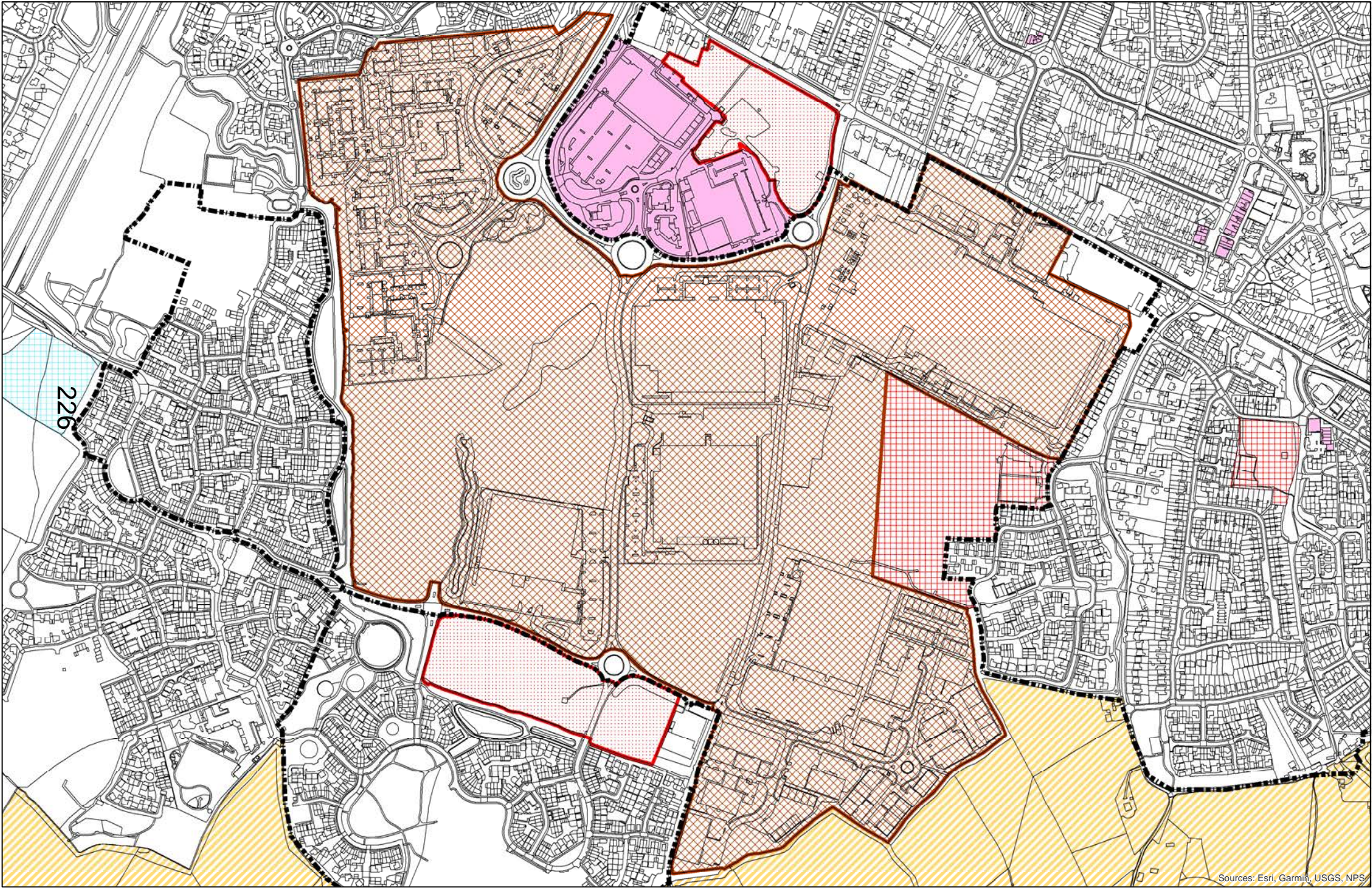
Policy EMP1 – Major Employment Sites

Policy EMP2 – Rural Business Centres

Policy GRB2 – Gloucestershire Airport

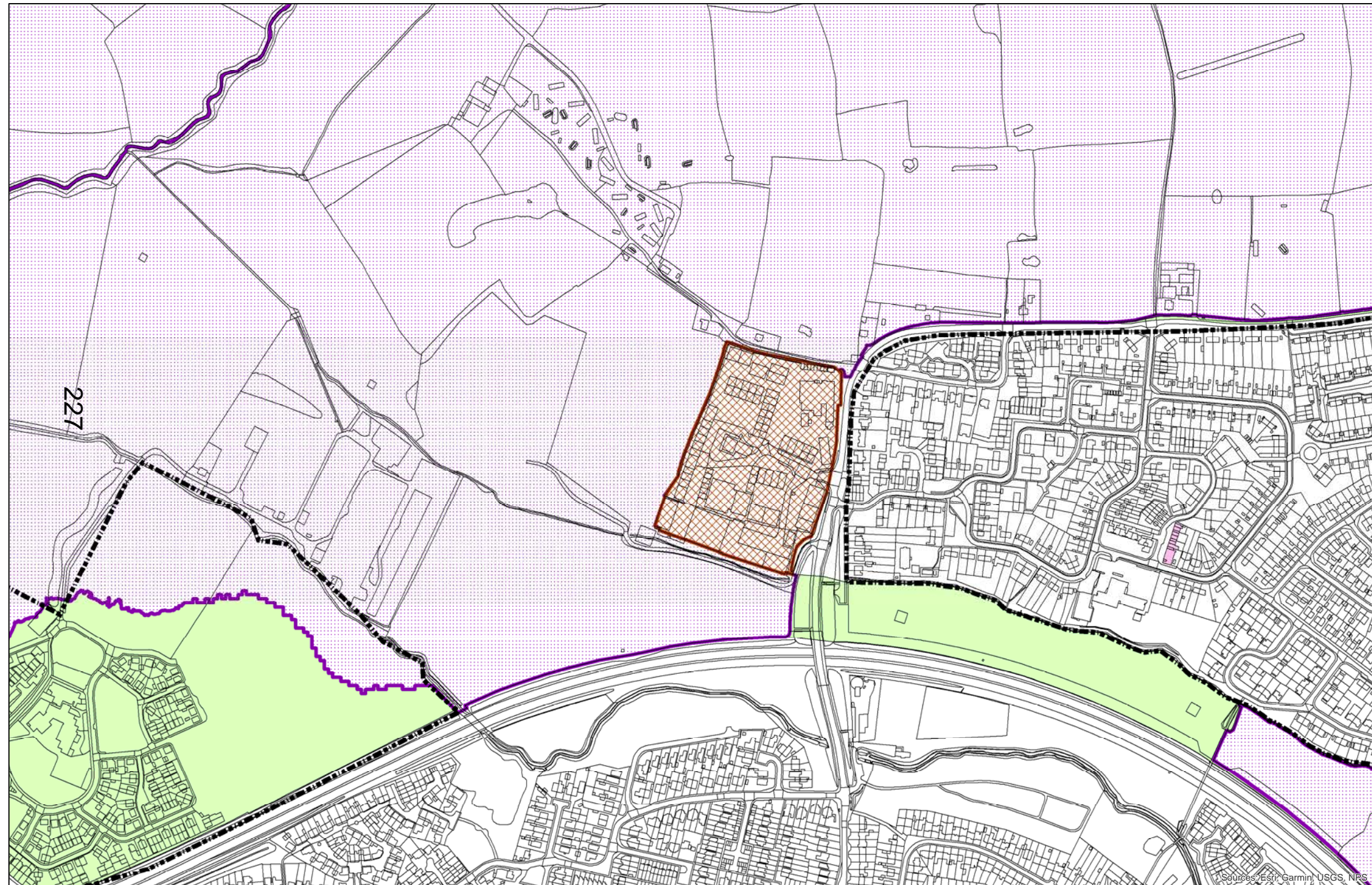
Policy GRB3 – Bamfurlong Operational Policing Site

EMP1 - Gloucester Business Park (Brockworth/Hucclecote)

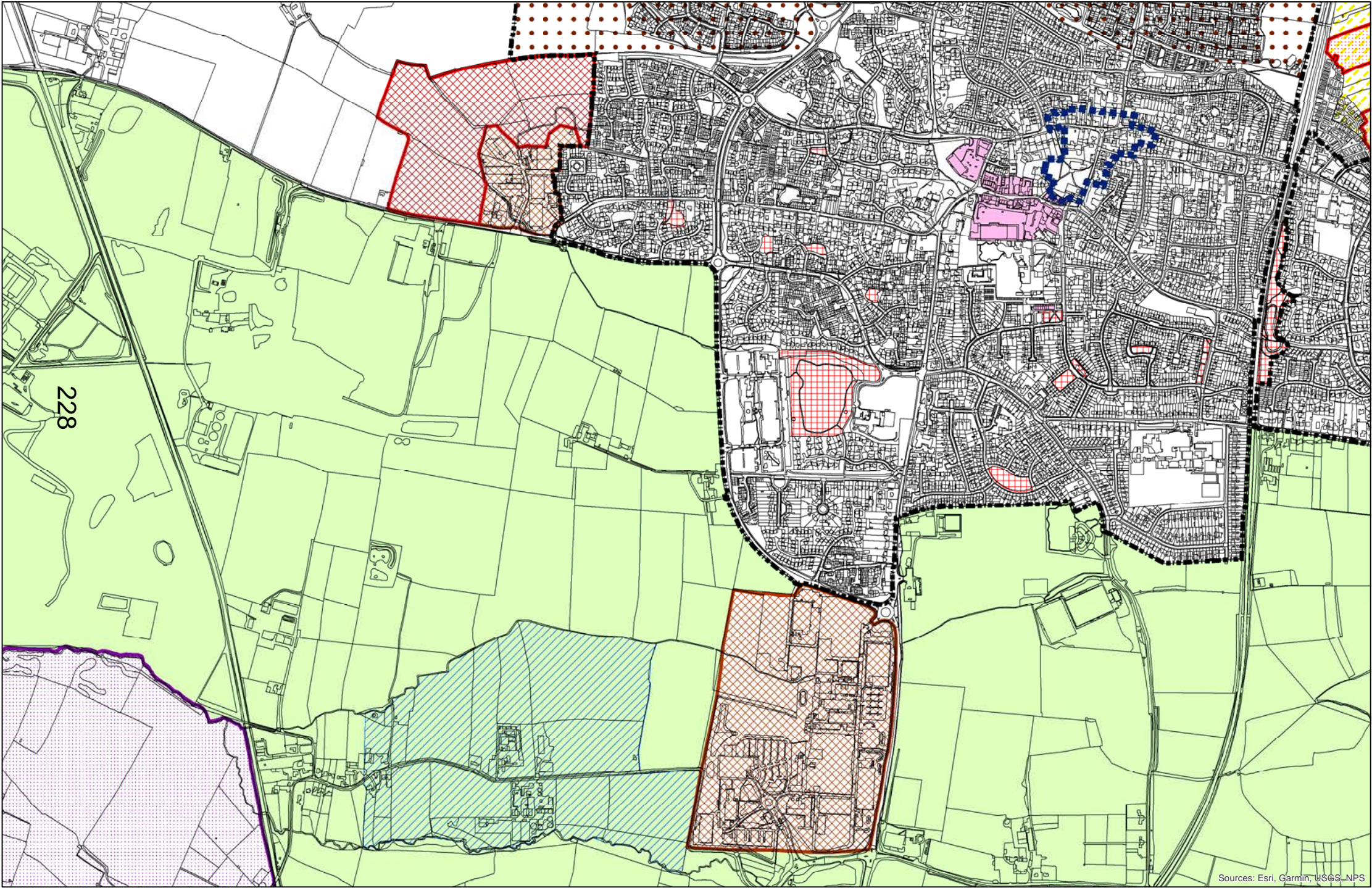


Sources: Esri, Garmin, USGS, NPS

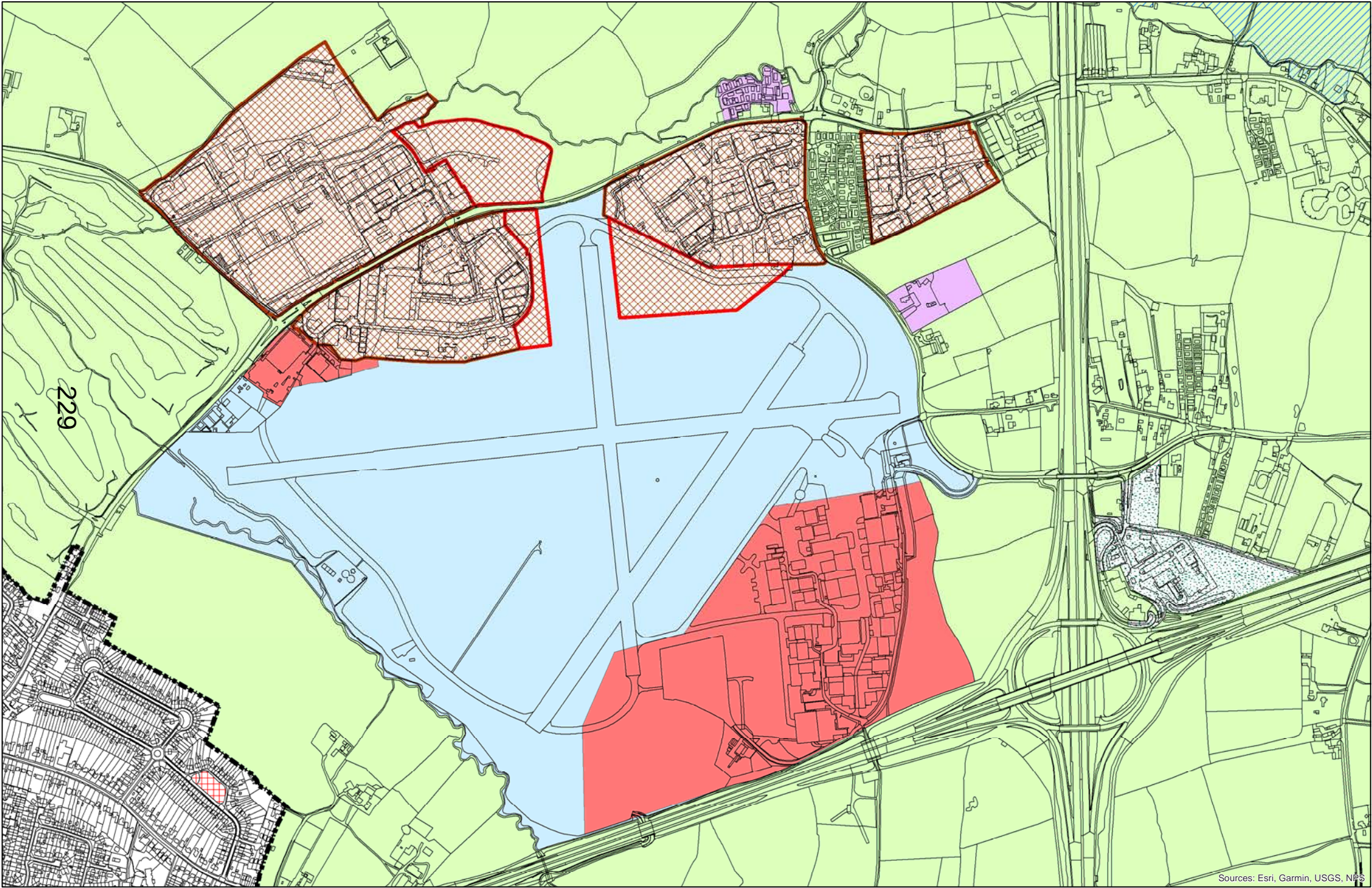
EMP1 - Innsworth Technology Park (Innsworth)



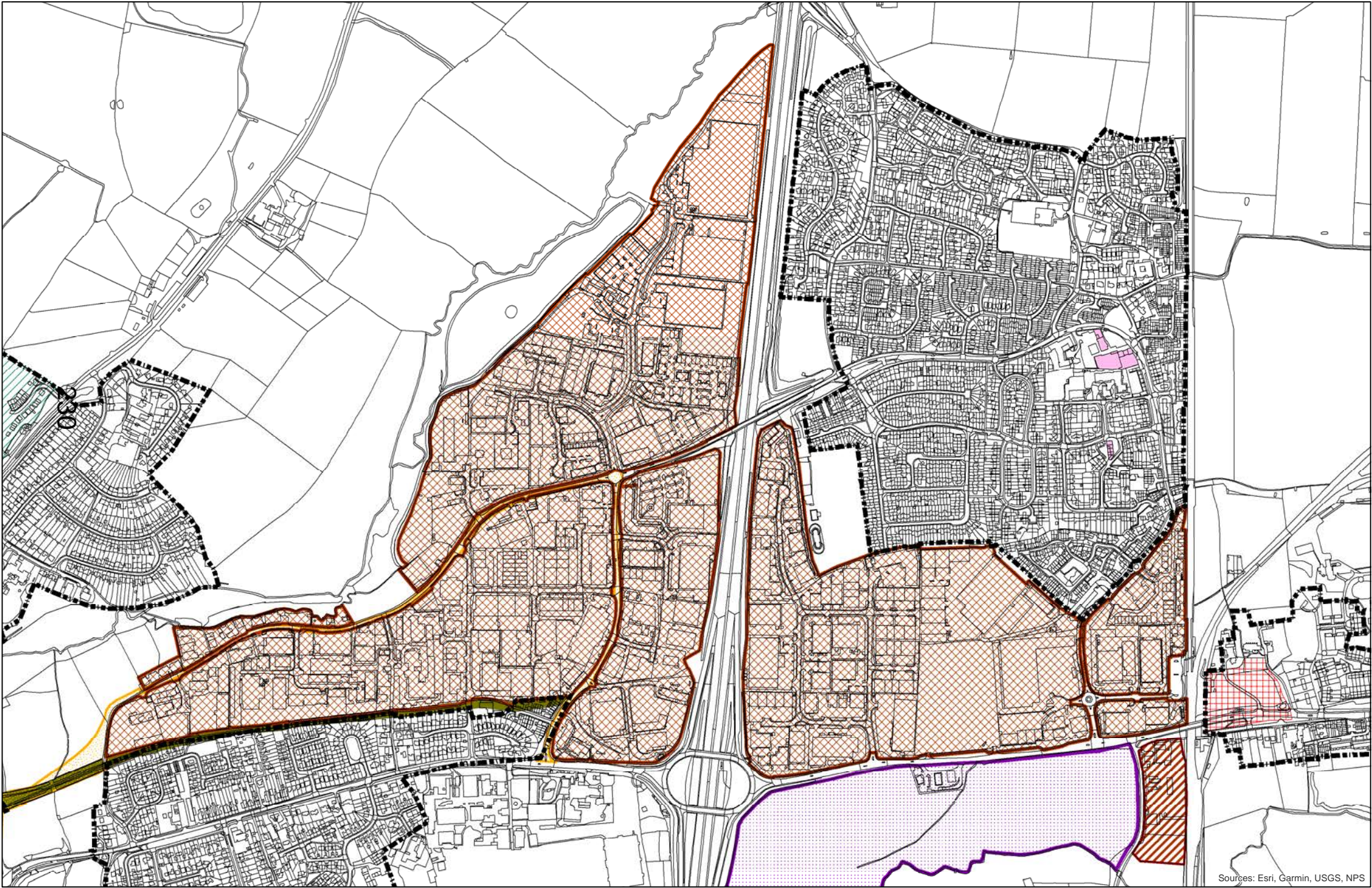
EMP1 - Cleeve & Malvern View Business Parks (Bishop's Cleeve)



EMP1 - Staverton/Gloucestershire Airport Business Parks (Staverton)

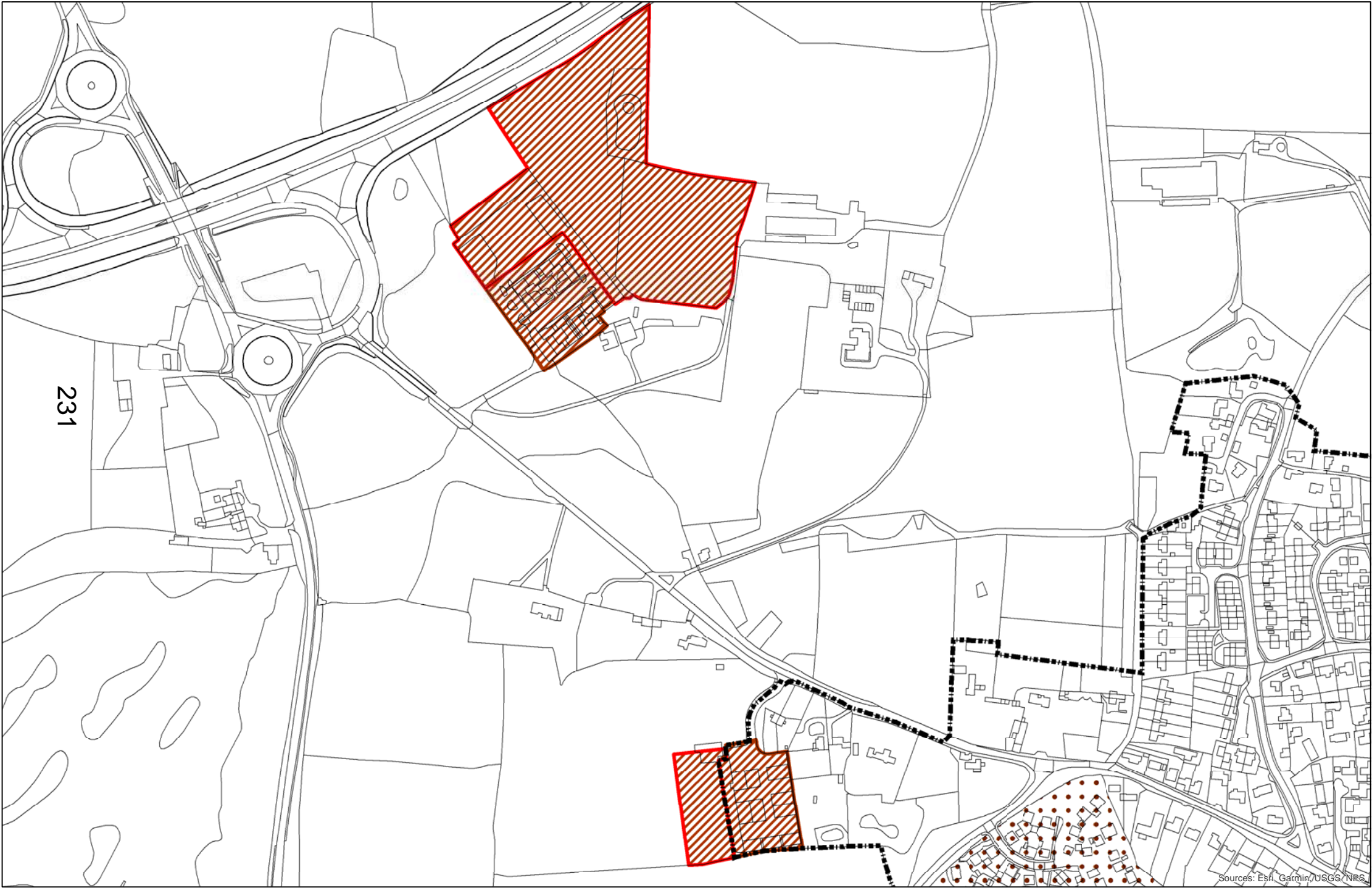


EMP1 - Tewkesbury & Ashchurch Business Parks

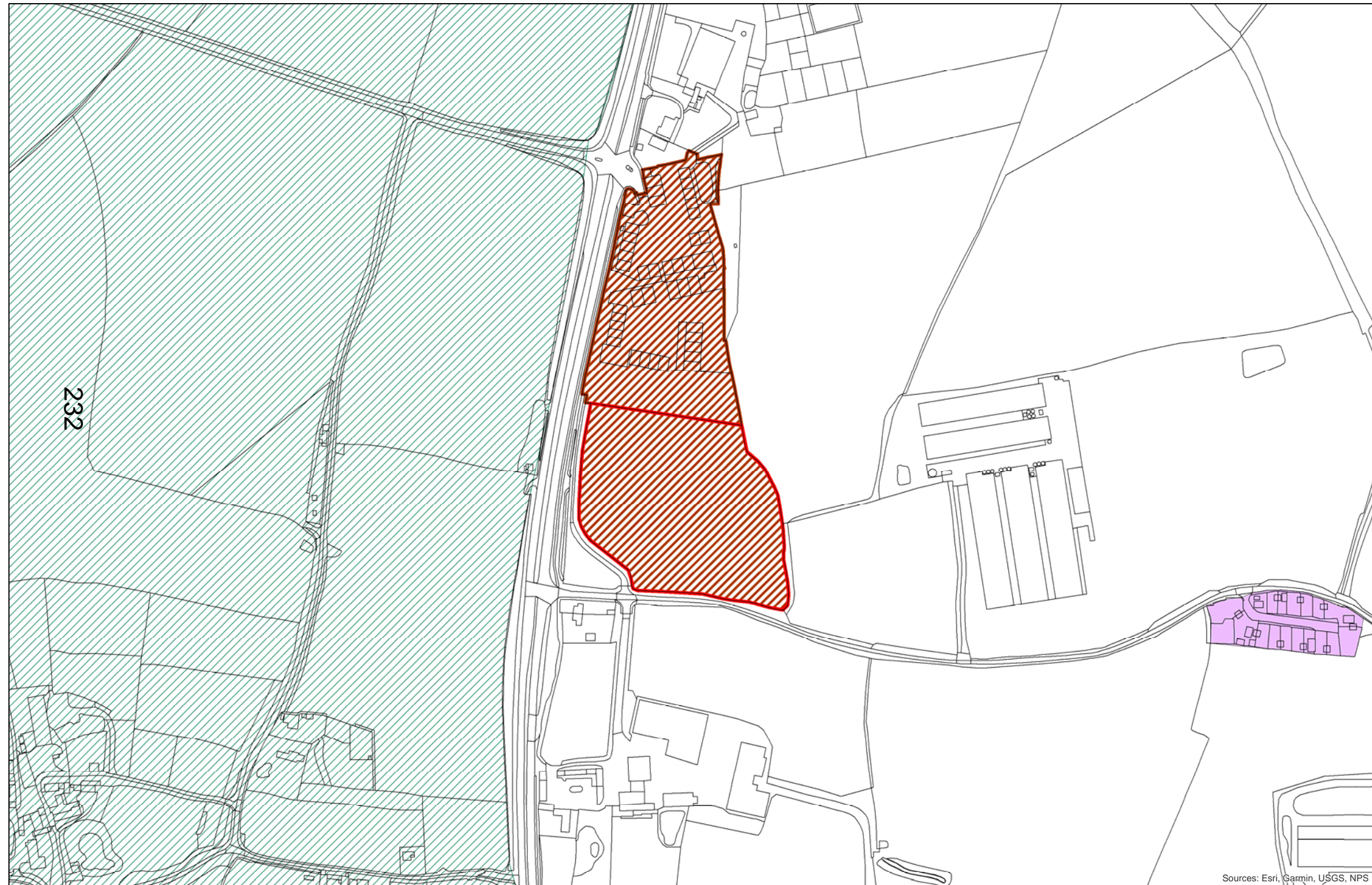


Sources: Esri, Garmin, USGS, NPS

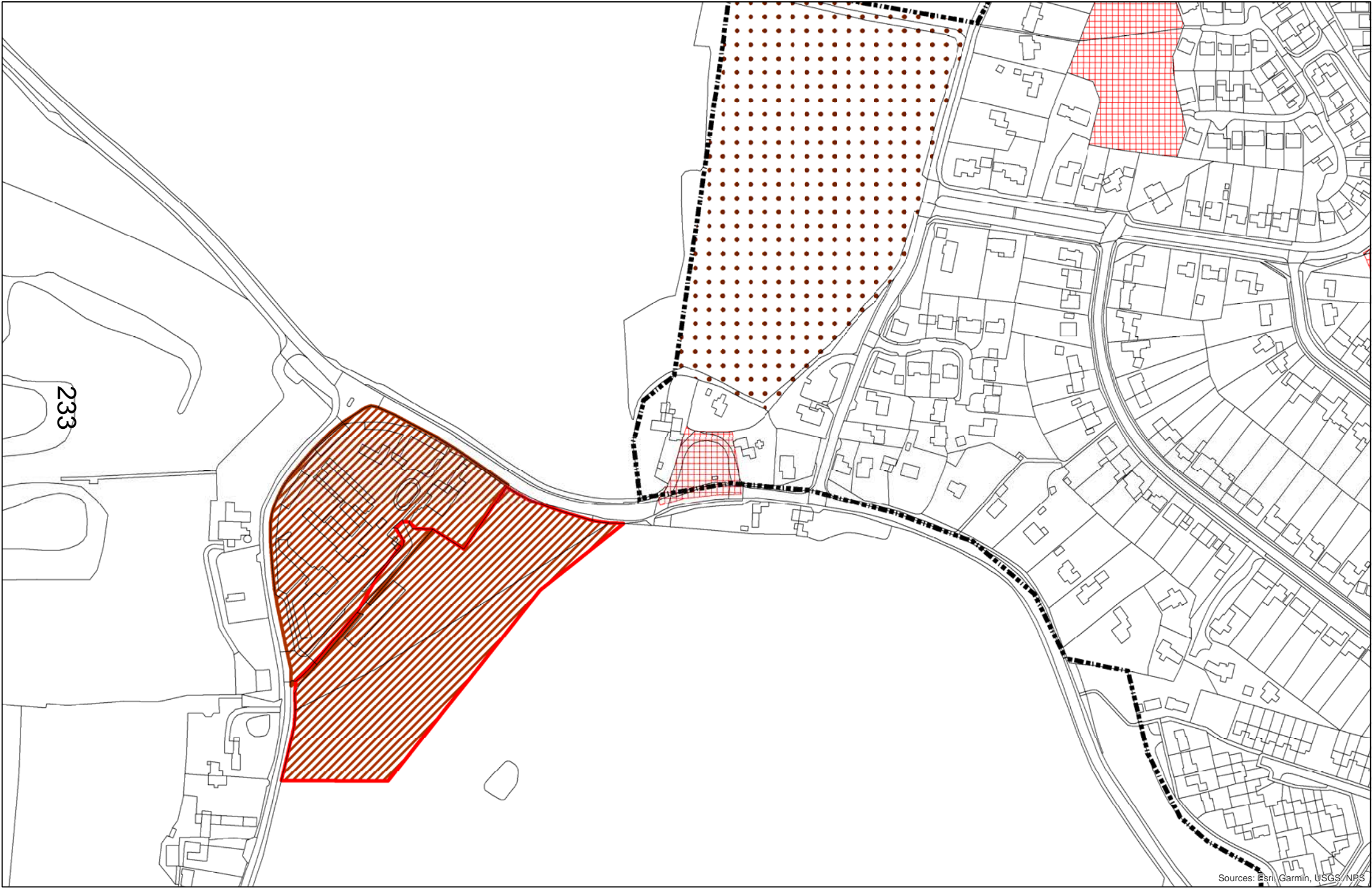
EMP2 - Brockeridge Farm & Duddage Manor Business Parks (Twyning)



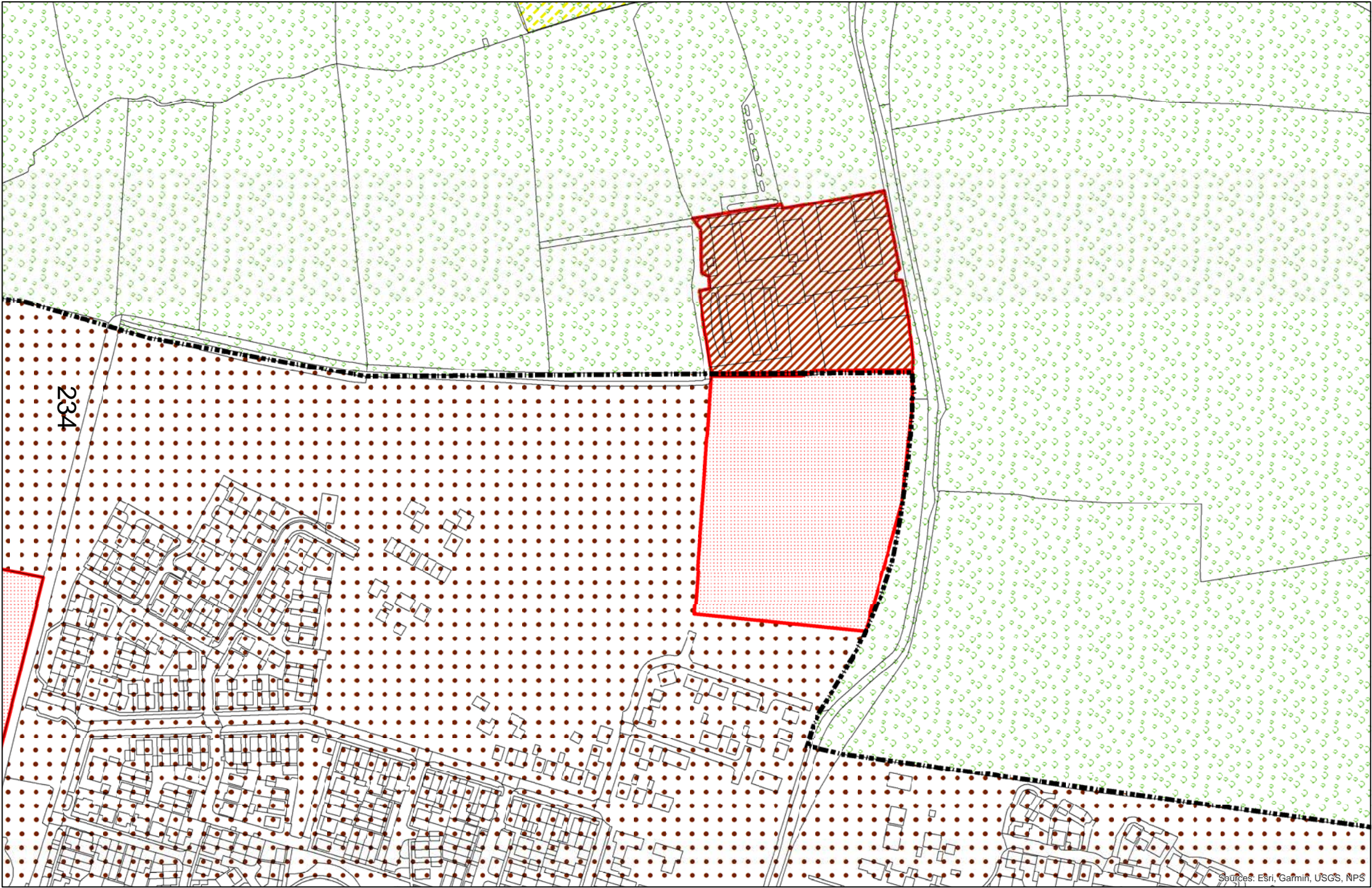
EMP2 - Highfield Farm Business Park (Elmstone Hardwicke)



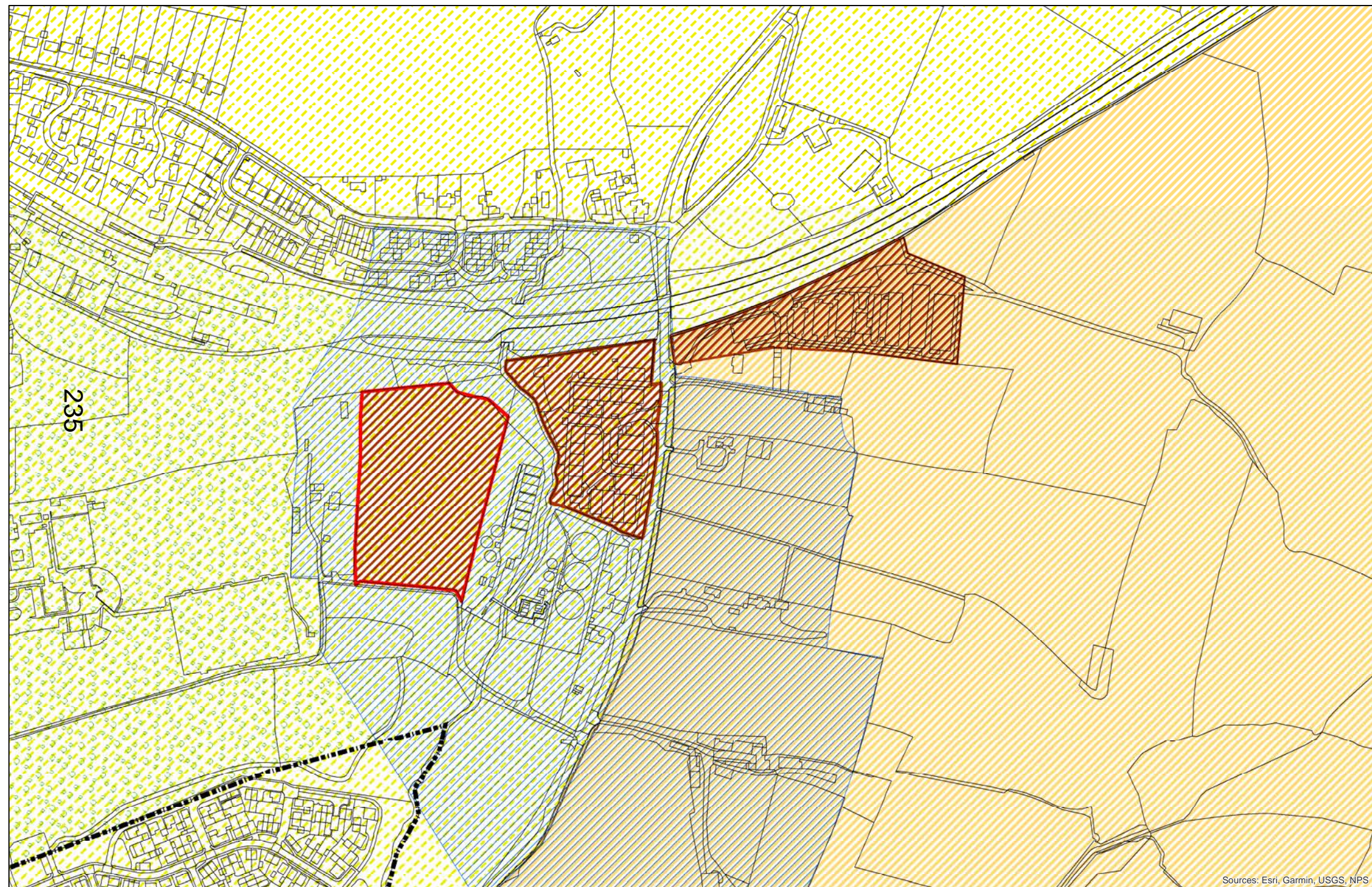
EMP2 - Highnam Business Centre (Highnam)



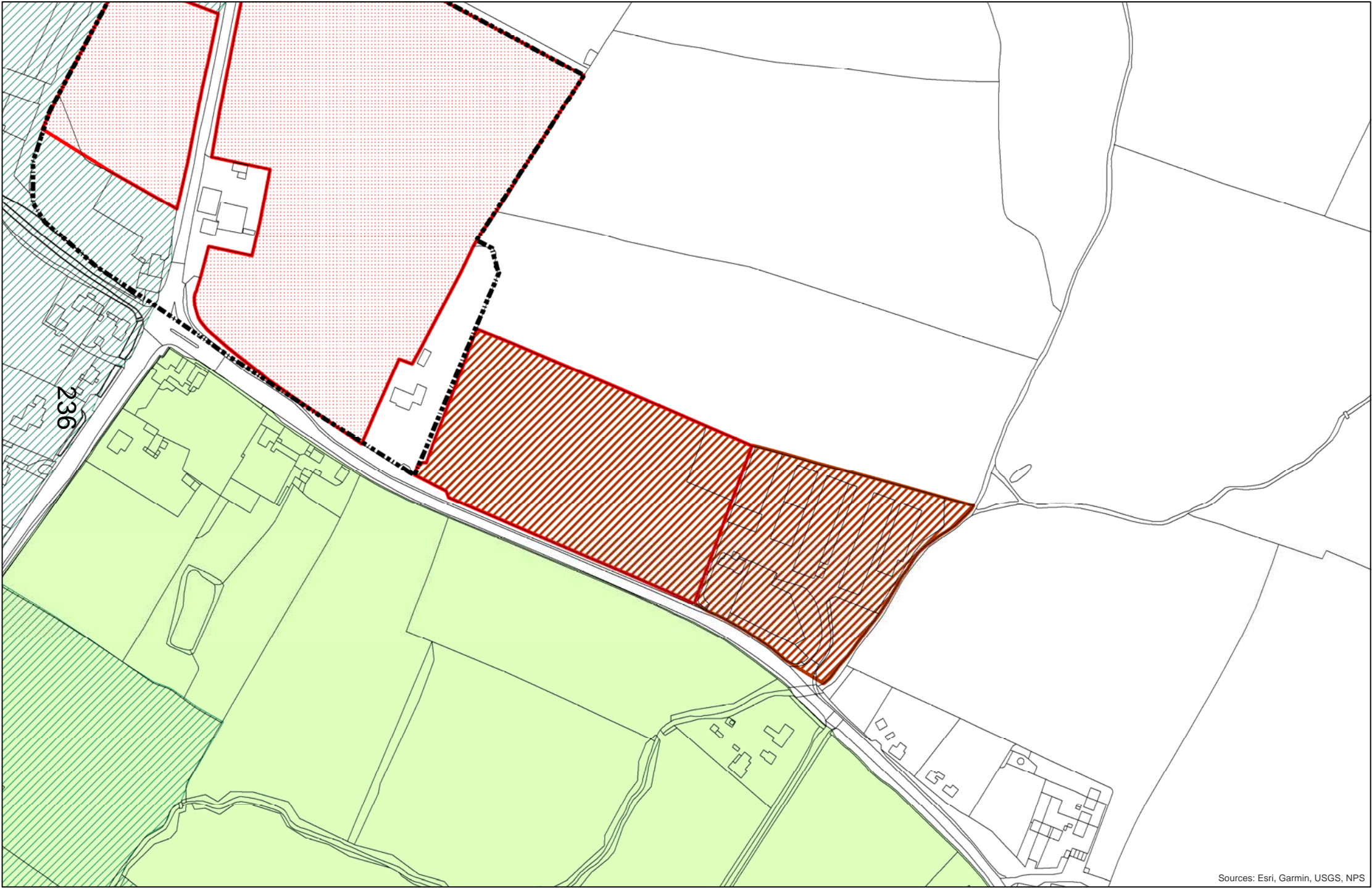
EMP2 - Homelands Farm (Bishop's Cleeve)



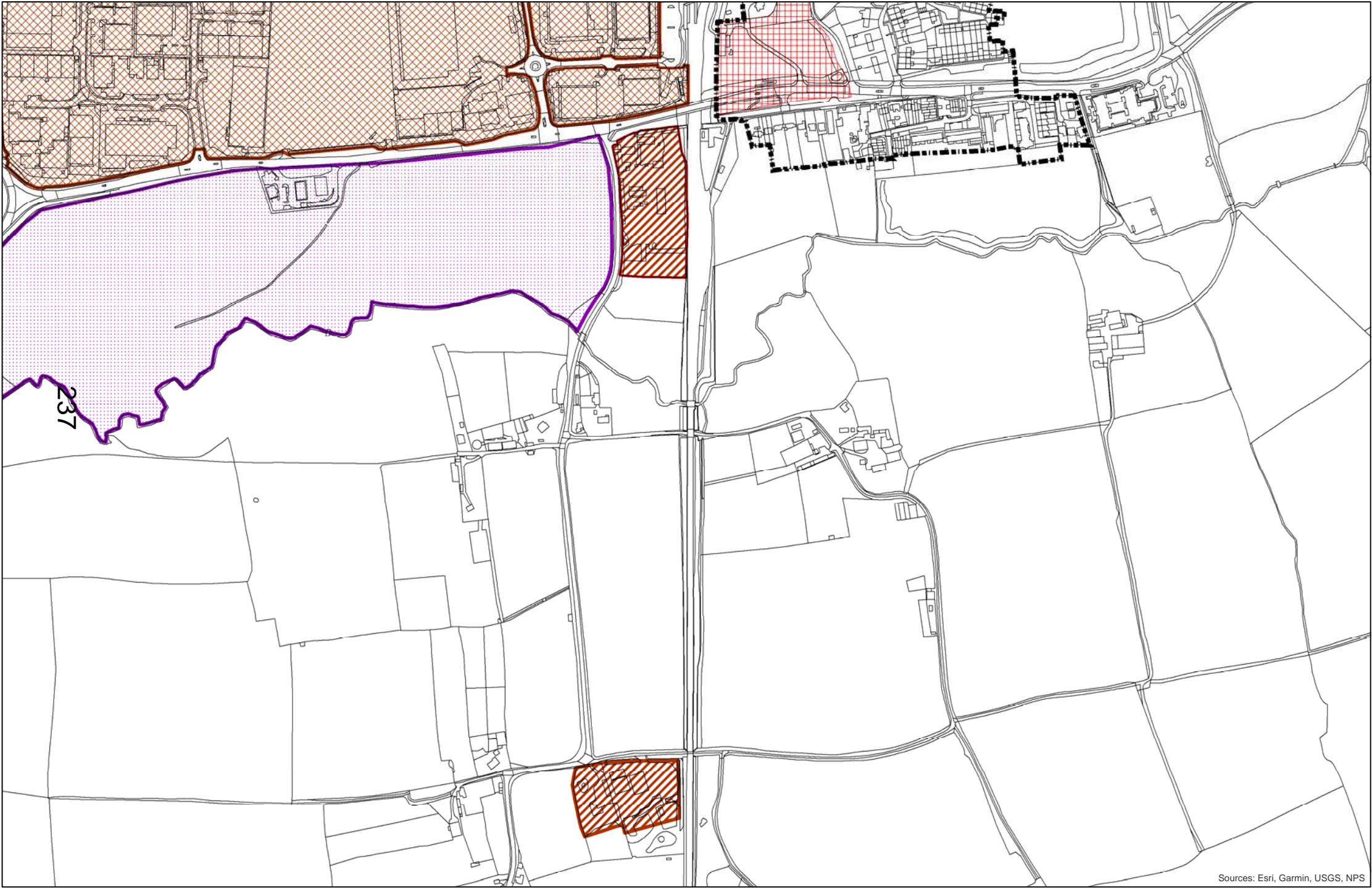
EMP2 - Isbourne Business Centre & Withytrees Farm (Winchcombe)



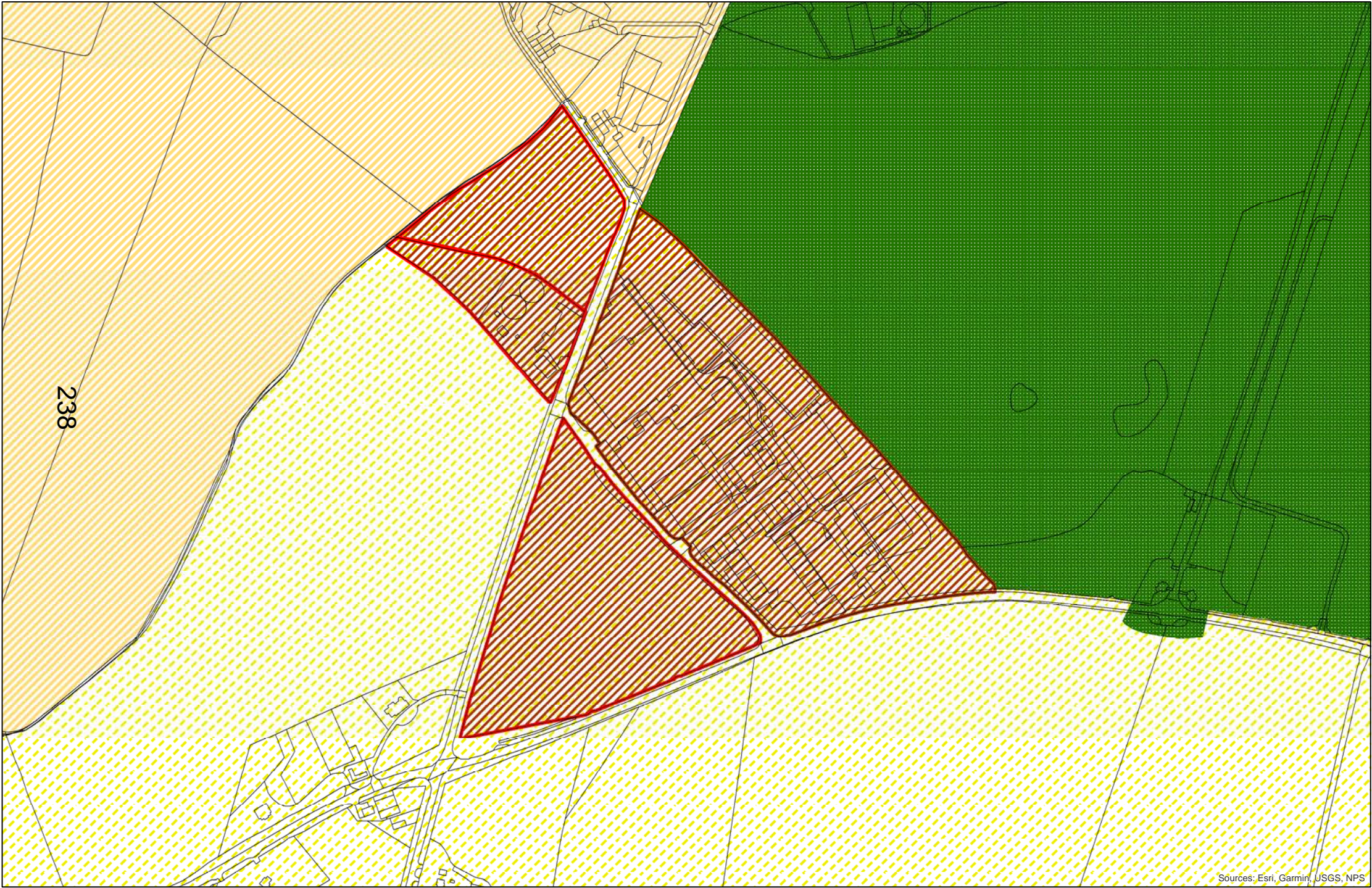
EMP2 - Knightsbridge Business Centre (Coombe Hill)



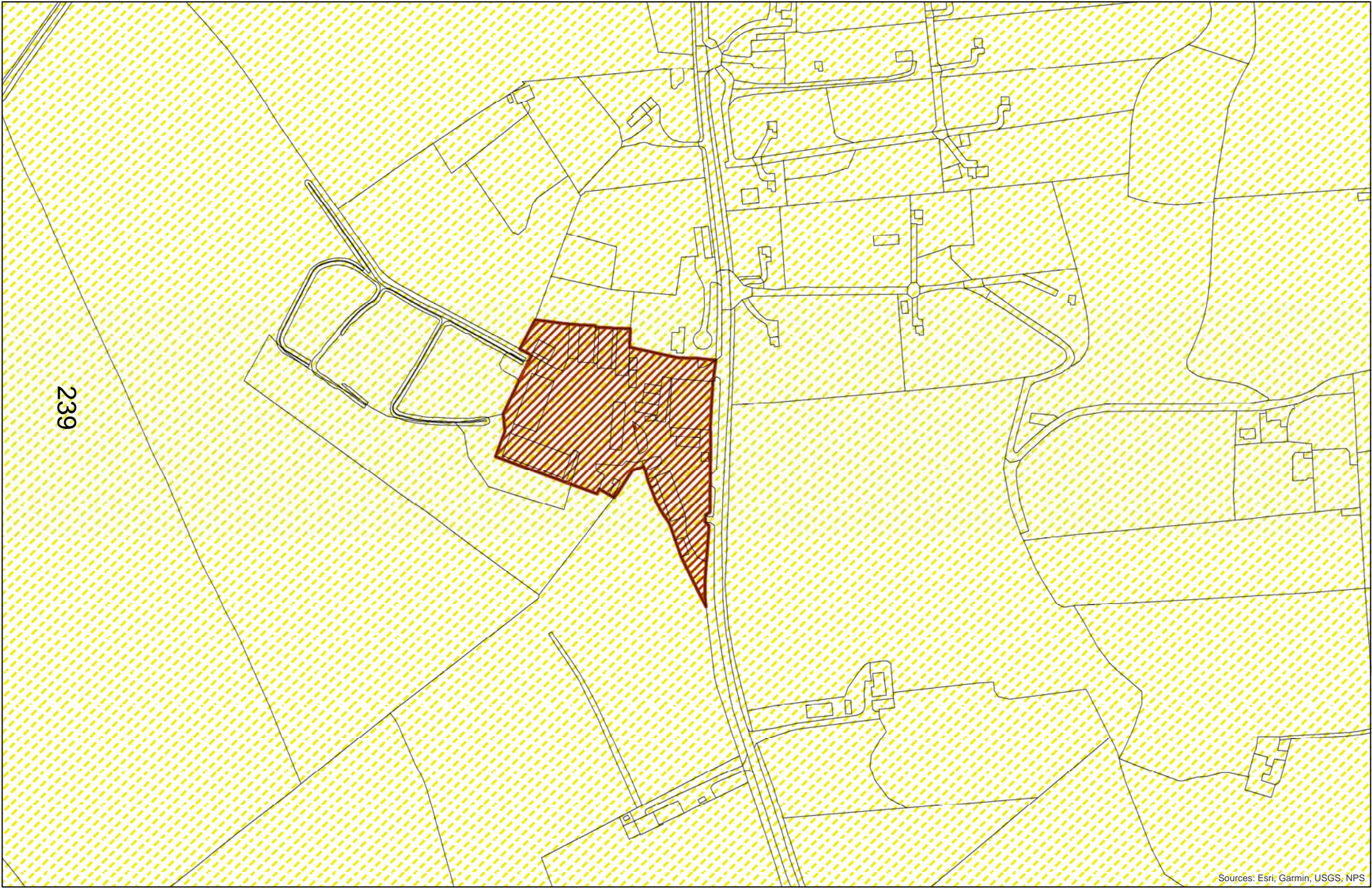
EMP2 - Newton Farm Business Park and Homedowns Achievement Park



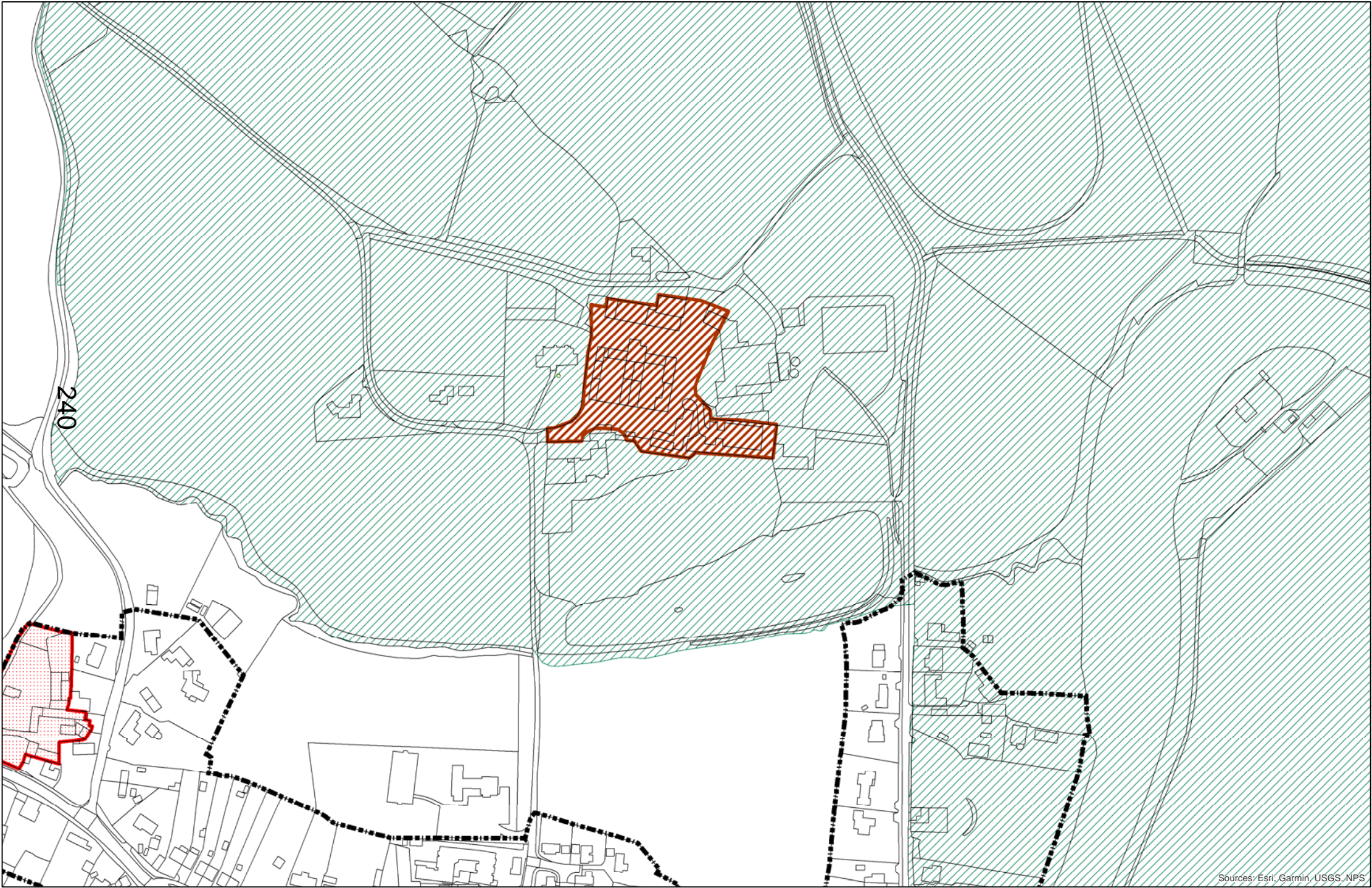
EMP2 - Orchard Industrial Estate (Toddington)



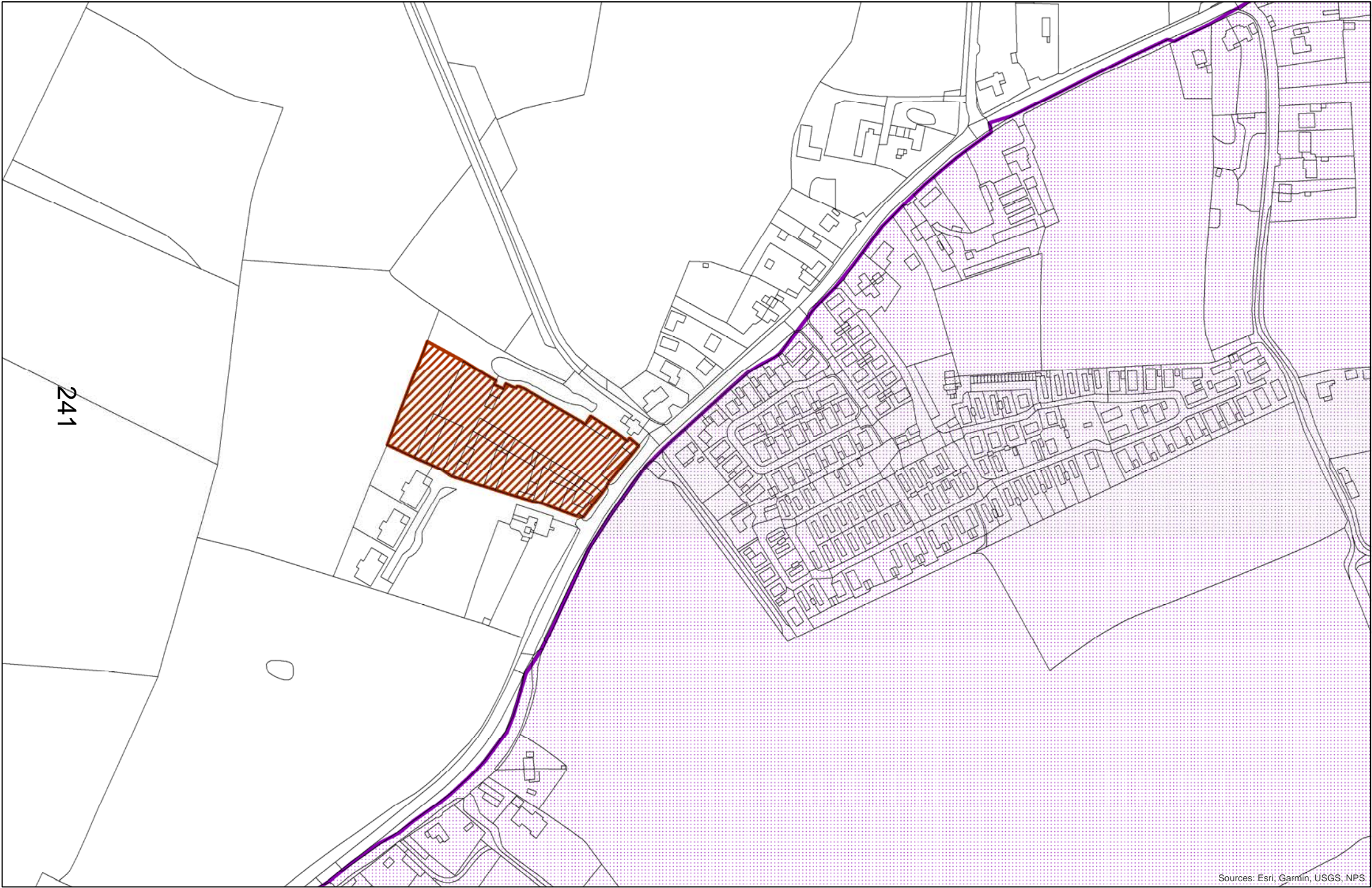
EMP2 - Park Farm Industrial Estate (Greet)



EMP2 - The Steadings (Maisemore)



EMP2 - Twigworth Court (Twigworth)



241

RETAIL & CENTRES MAPS

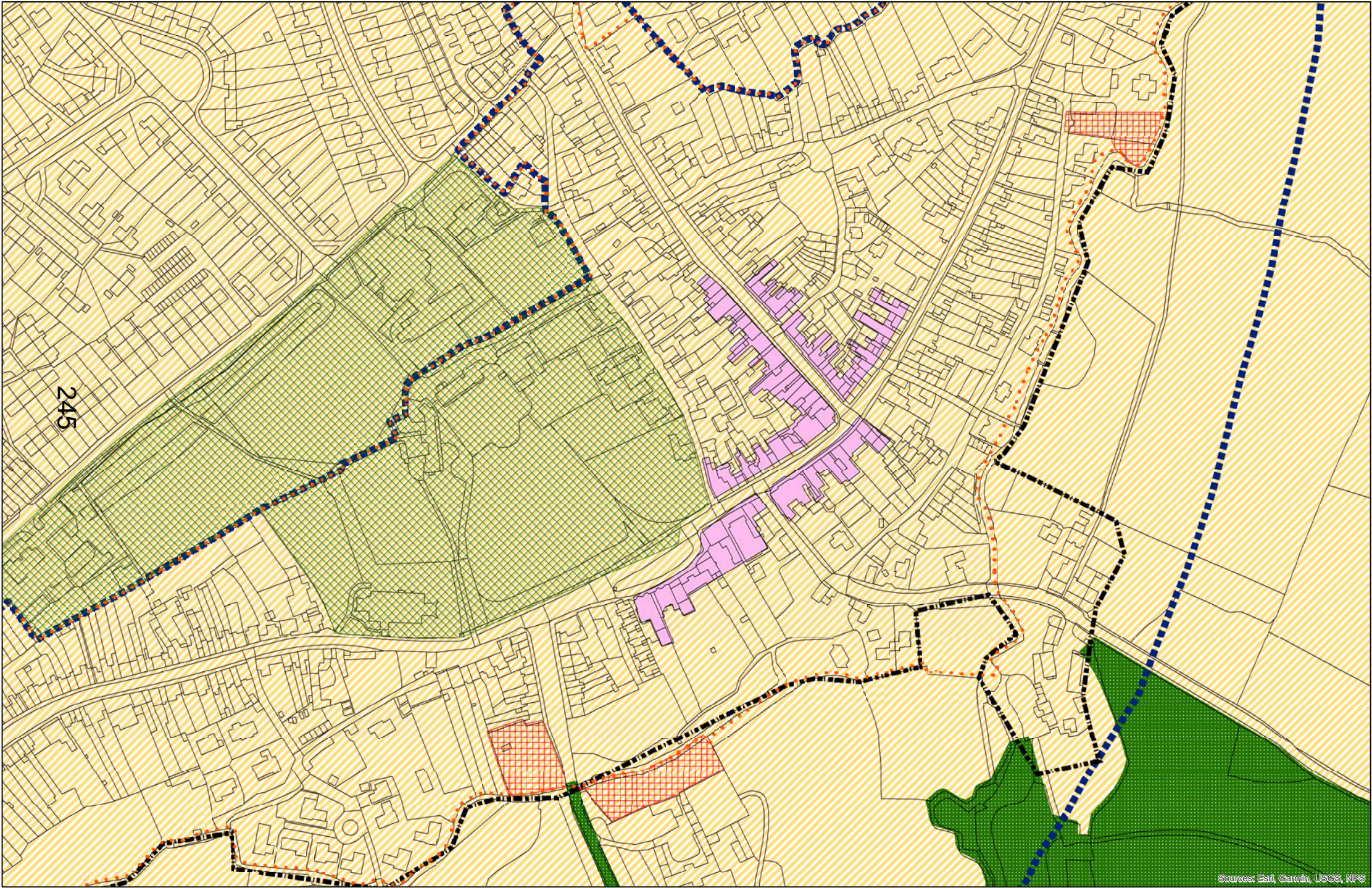
Policy RET1 – Maintaining the vitality and viability of the town, borough and local centres

Policy RET2 – Tewkesbury Town Centre and Primary Frontages

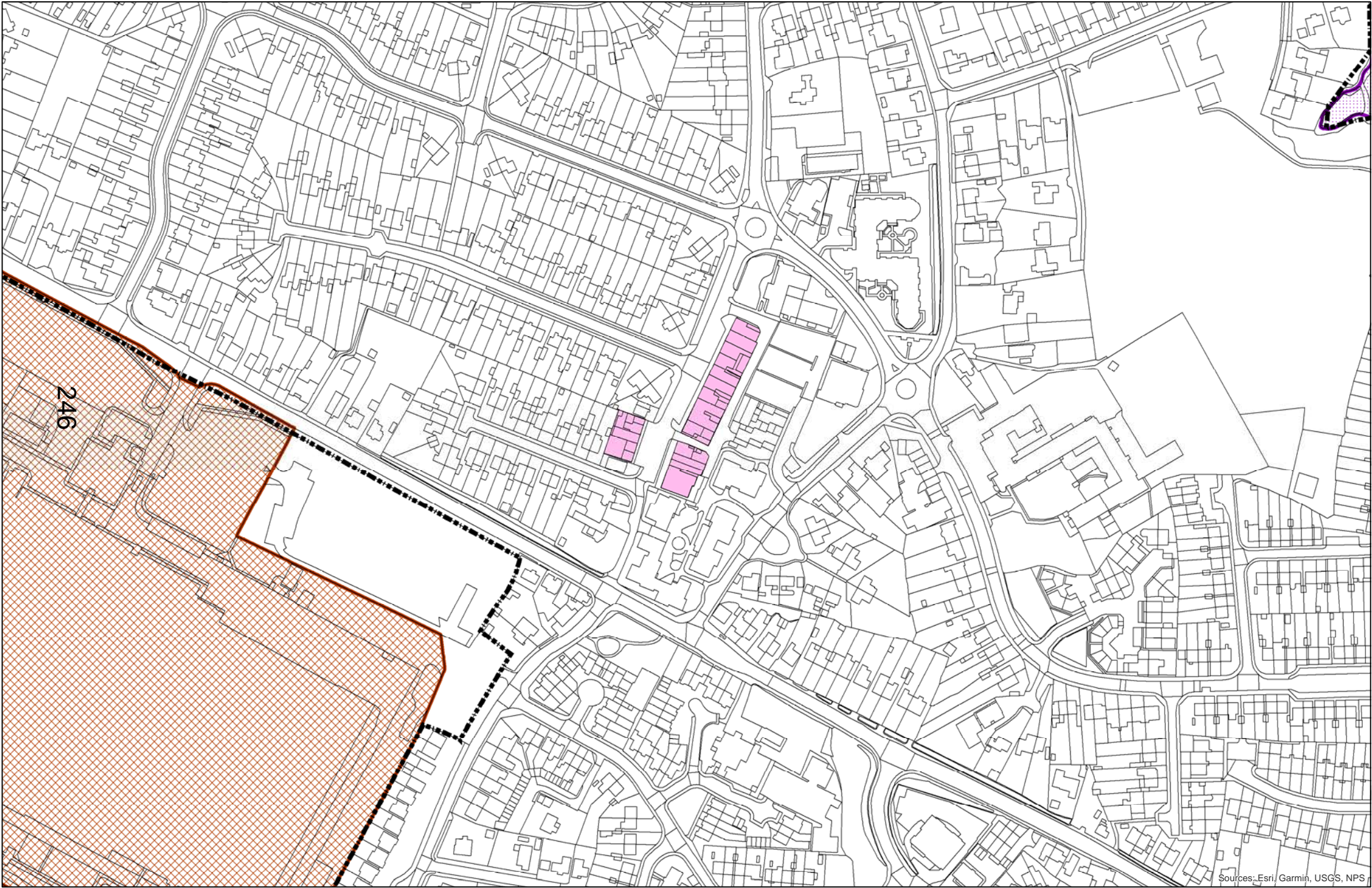
Policy RET3 – Retail Centres

Policy RET9 – Tewkesbury Town Regeneration

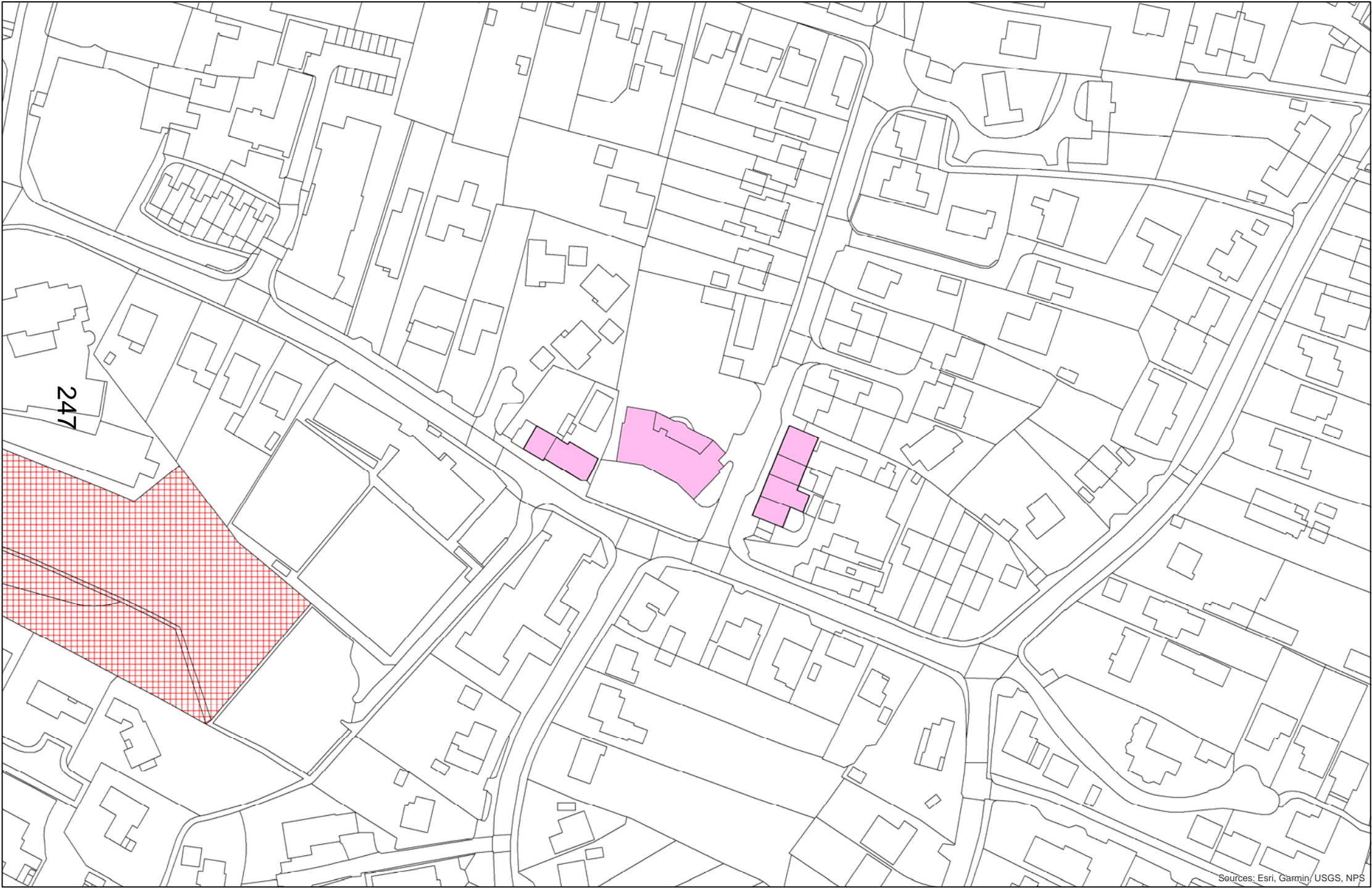
RET3 - Winchcombe Town Centre



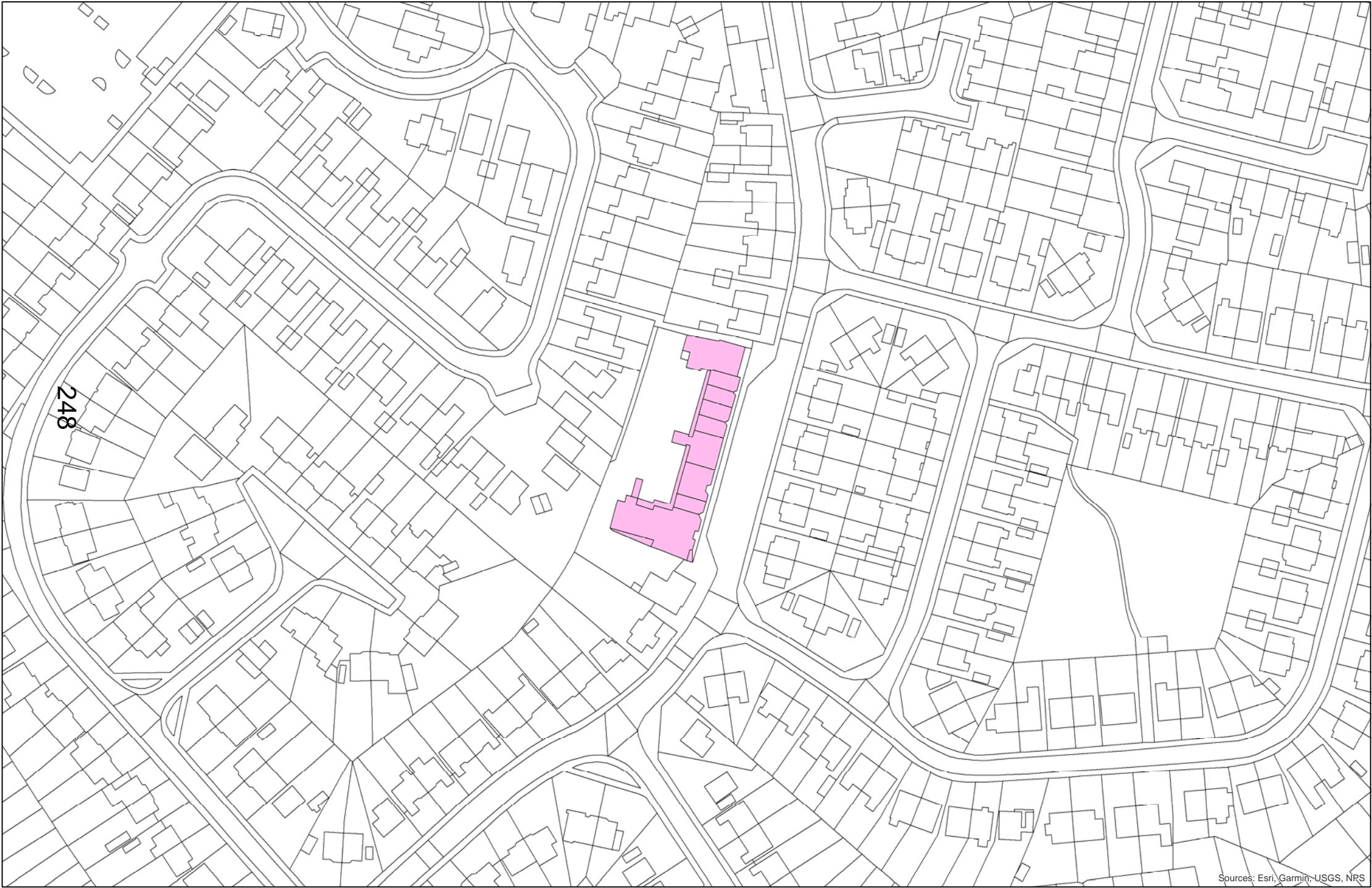
RET3 - Brockworth Local Centre



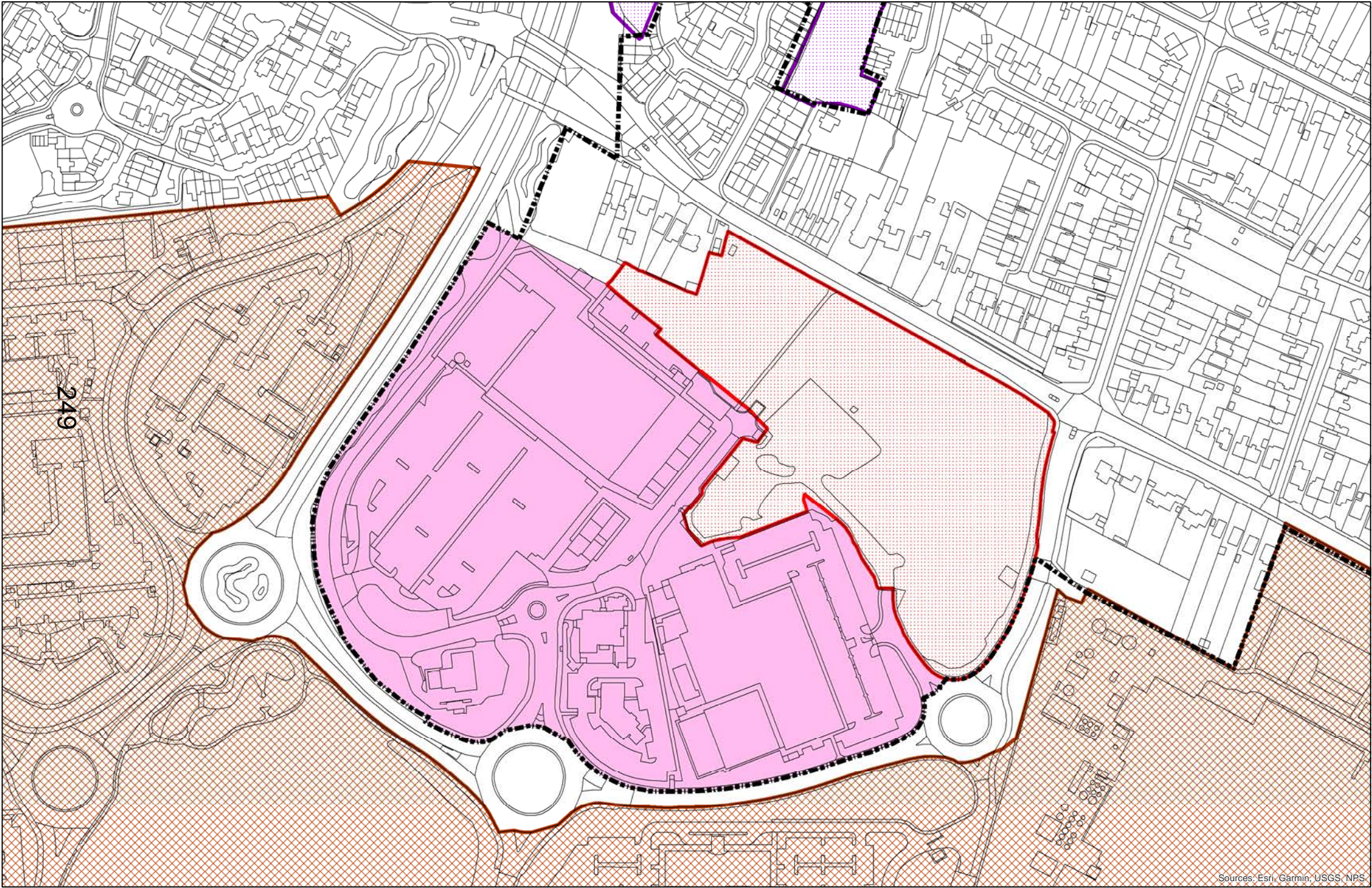
RET3 - Churchdown Local Centre (Church Road)



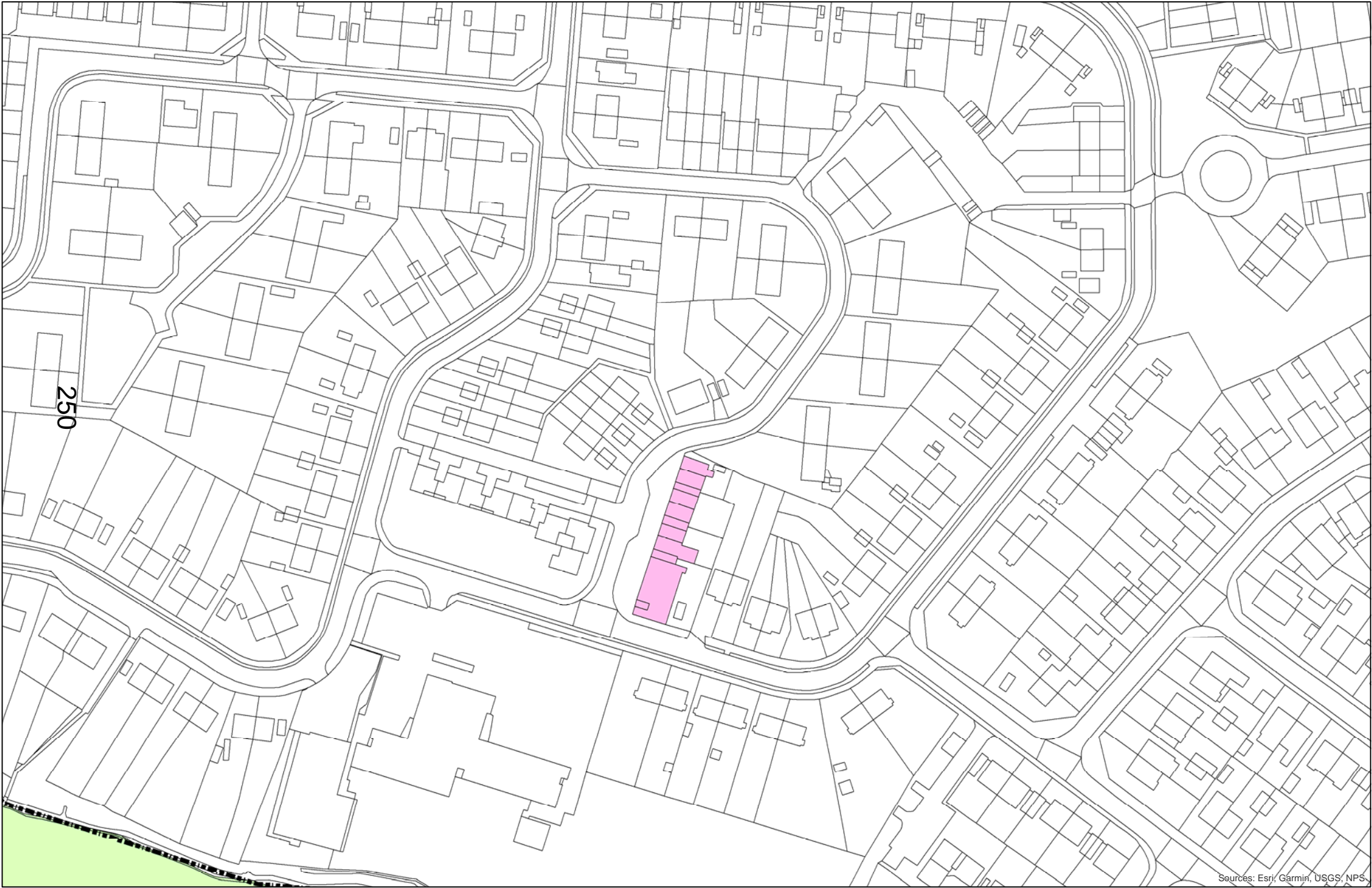
RET3 - Churchdown Local Centre (St Johns Avenue)



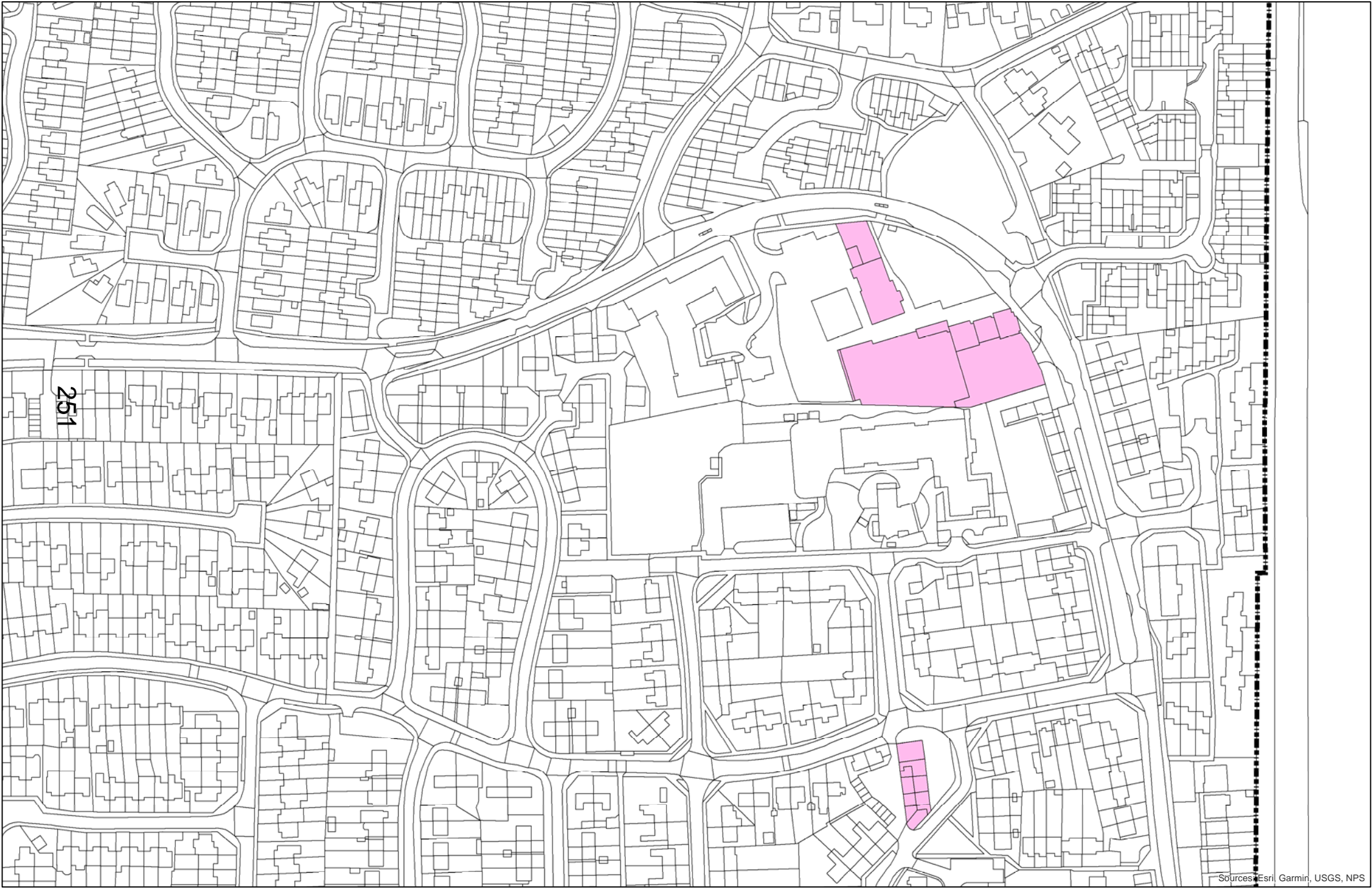
RET3 - Coopers Edge Local Centre



RET3 - Innsworth Local Centre



RET3 - Northway Local Centre



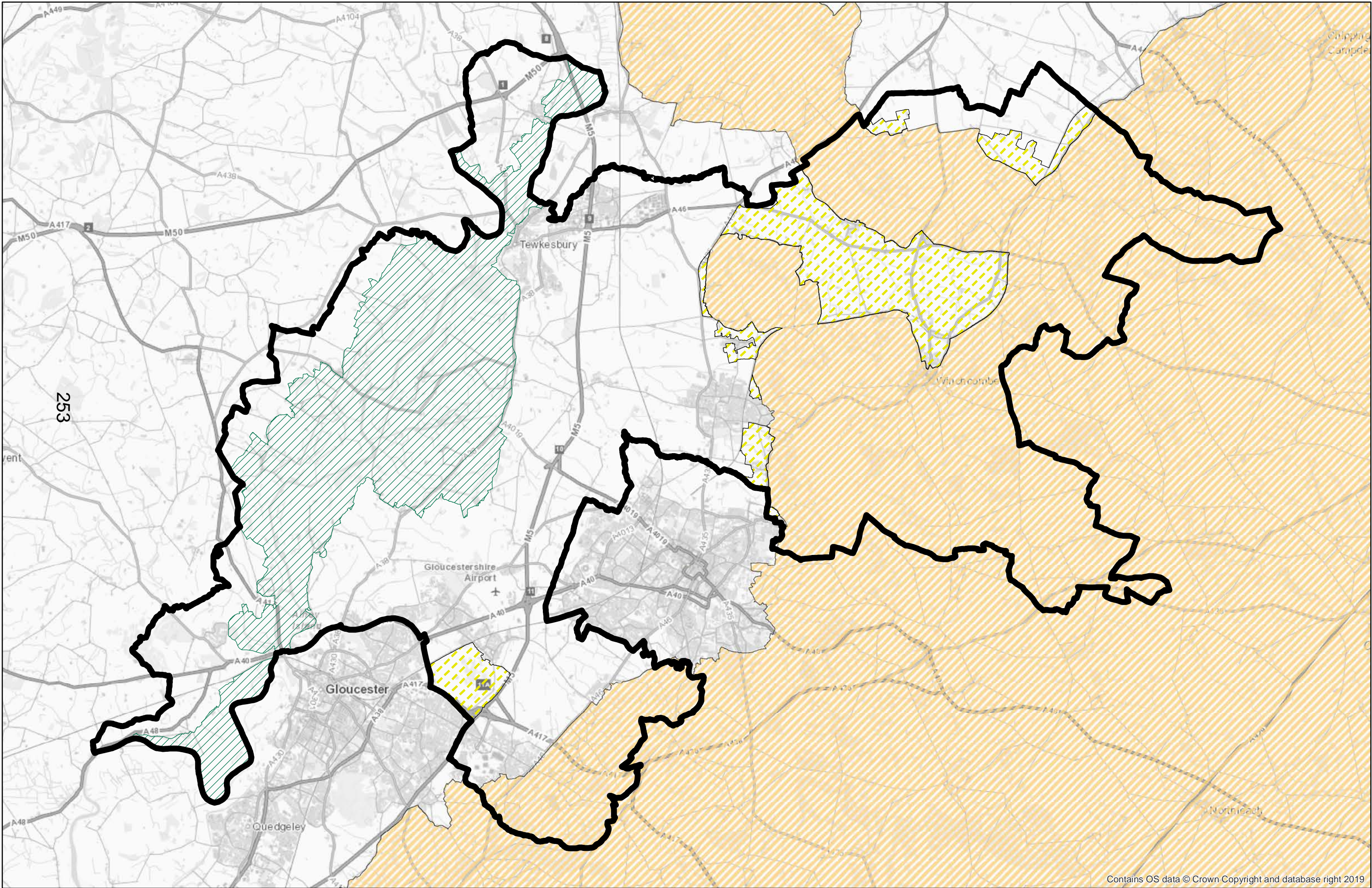
NATURAL ENVIRONMENT MAPS

Policy LAN1 – Special Landscape Area

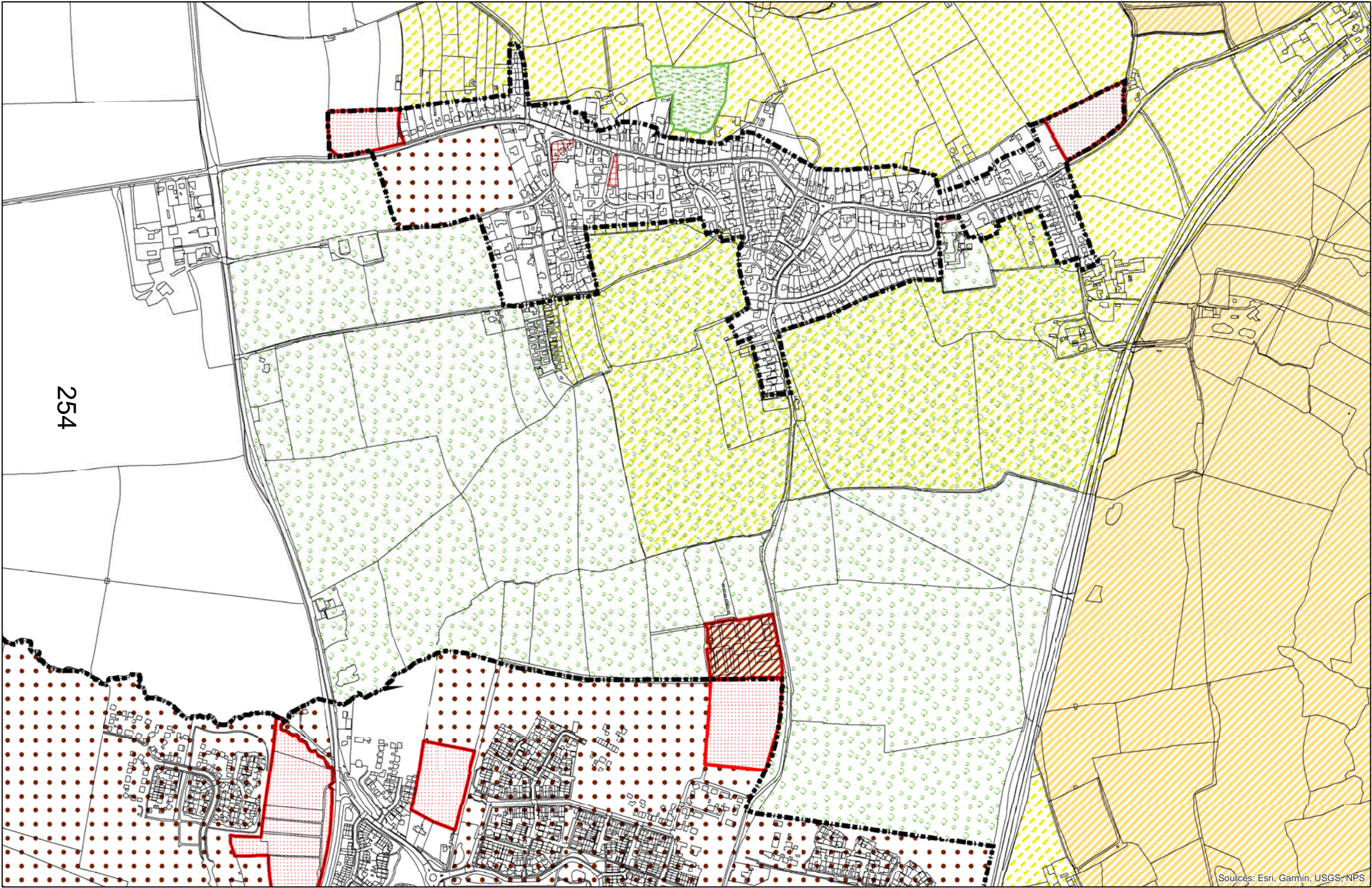
Policy LAN2 – Landscape Protection Zone

Policy LAN3 – Strategic Gaps

LAN1 Special Landscape Area & LAN2 Landscape Protection Zone

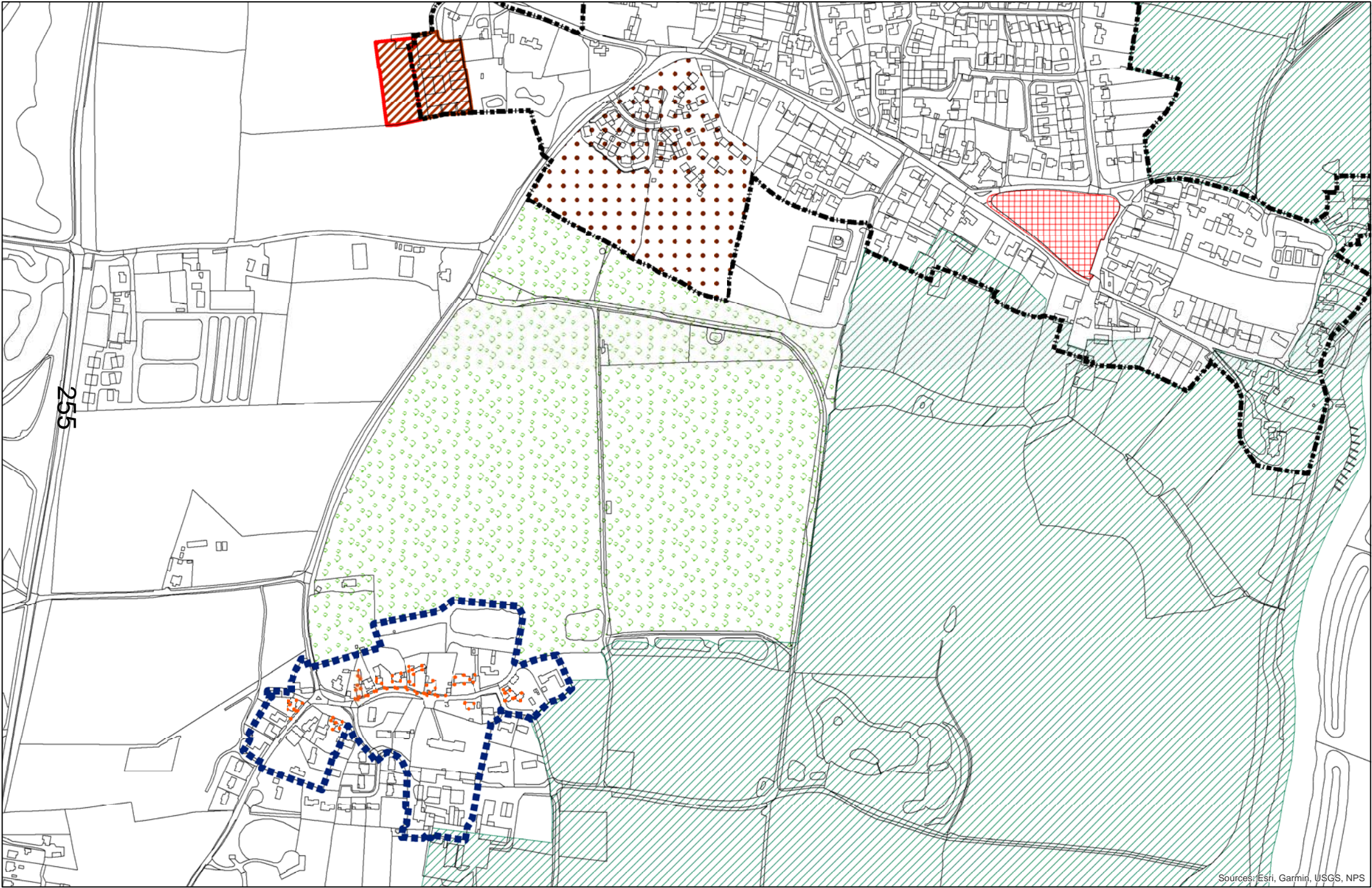


LAN3 - Bishop's Cleeve/Gotherington Strategic Gap

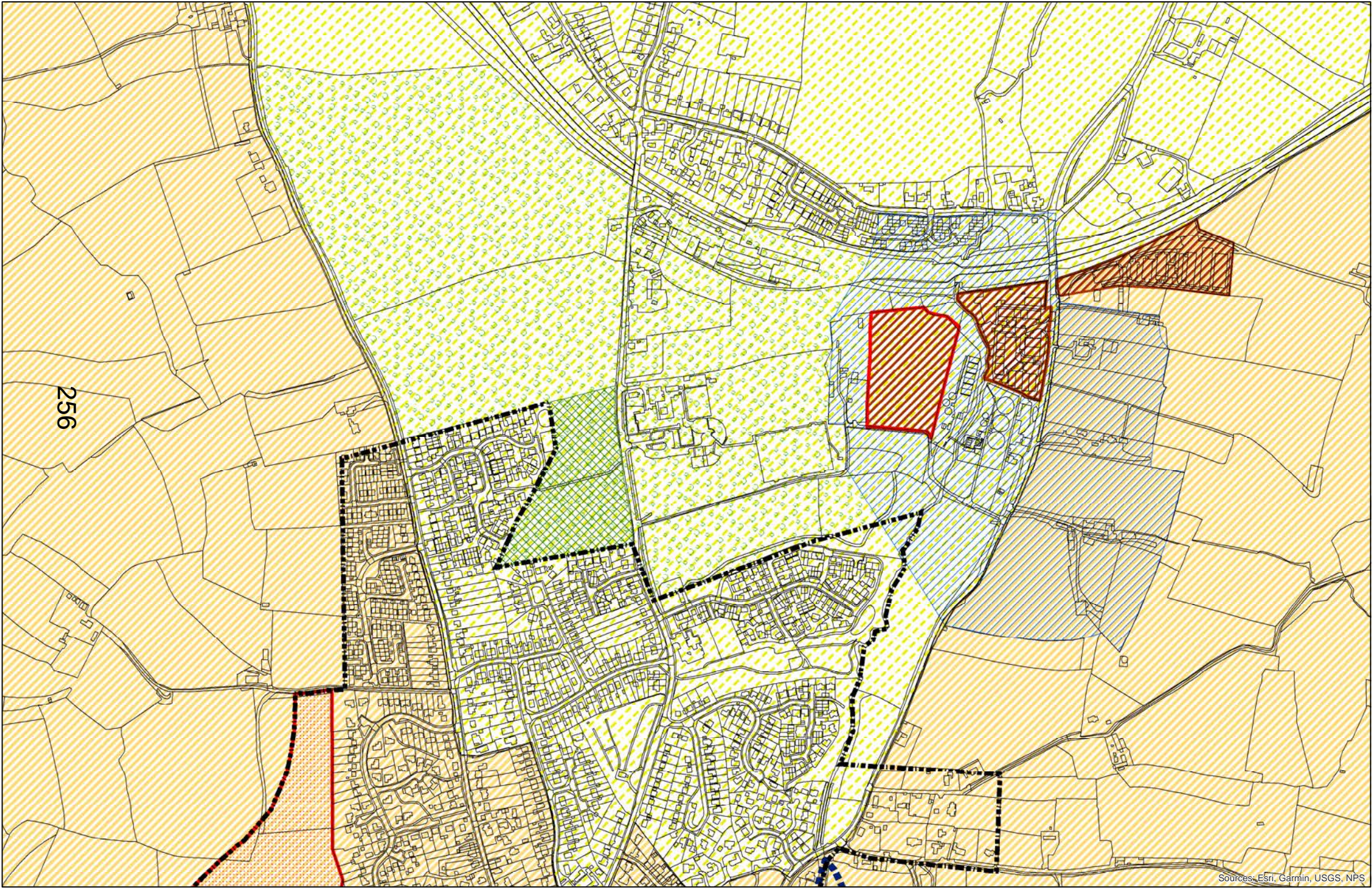


254

LAN3 - Twyning/Church End Strategic Gap



LAN3 - Winchcombe/Greet Strategic Gap



TEWKESBURY BOROUGH COUNCIL

Report to:	Audit and Governance Committee
Date of Meeting:	24 July 2019
Subject:	Audit and Governance Committee Annual Report 2018/19
Report of:	Chief Audit Executive (Head of Corporate Services)
Corporate Lead:	Chief Executive
Lead Member:	Lead Member for Corporate Governance
Number of Appendices:	One

Executive Summary:

The role of the Audit and Governance Committee is to obtain independent assurance of the adequacy of the Council's risk management, governance and internal control arrangements. Reporting the work of the Committee through an annual report provides an opportunity for both the Council and the public to view the work of the Committee and demonstrate it is delivering its terms of reference.

Recommendation:

To APPROVE the Audit and Governance Committee Annual Report 2018/19.

Reasons for Recommendation:

It is within the Terms of Reference of the Committee to produce an annual report on their performance. An annual report also helps increase the profile of the Committee. It is important to ensure that the work of the Committee, and the assurance it provides as to how well certain aspects of the Council is performing, is reported beyond the Committee itself.

Resource Implications:

None.

Legal Implications:

None.

Risk Management Implications:

The production of an annual report helps to demonstrate the effectiveness of the Committee and minimise the risk it is not fulfilling its approved Terms of Reference.

Performance Management Follow-up:

Annual review of the work of the Committee provides transparency and accountability and increases the profile of the Committee. The annual report will also be presented at Council by the Chair of the Committee.

Environmental Implications:

None.

1.0 INTRODUCTION/BACKGROUND

1.1 The Audit and Governance Committee must deliver the work required of it as set out in the Council's Constitution. The Committee undertakes an assurance role to ensure the Council's risk, governance and internal control environment is operating effectively. The Committee has a formal work programme for the year and this programme ensures there is adequate coverage of the council's activities to fulfil the assurance role.

2.0 AUDIT AND GOVERNANCE COMMITTEE ANNUAL REPORT

2.1 The production of an annual report is also good practice and helps demonstrate the broad coverage of activities that the Committee has been informed of, reviewed and challenged during the year. The coverage of the work undertaken has been achieved through a combination of the following:

- Internal audit monitoring reports.
- Annual Governance Statement.
- Financial reporting including the presentation and approval of the Council's Statement of Accounts.
- Gloucestershire Counter Fraud Unit reports.
- External audit monitoring reports.
- Reports on key governance policies and frameworks e.g. Health and Safety, risk management, General Data Protection Regulation.
- Serious and Organised Crime framework.

2.2 Following approval of the annual report it will be presented by the Chair of the Committee to Council. The 2018/19 annual report can be found in Appendix 1.

3.0 OTHER OPTIONS CONSIDERED

3.1 None.

4.0 CONSULTATION

4.1 None.

5.0 RELEVANT COUNCIL POLICIES/STRATEGIES

5.1 None.

6.0 RELEVANT GOVERNMENT POLICIES

6.1 None.

7.0 RESOURCE IMPLICATIONS (Human/Property)

7.1 None

8.0 SUSTAINABILITY IMPLICATIONS (Social/Community Safety/Cultural/ Economic/ Environment)

8.1 None

10.0 IMPACT UPON (Value For Money/Equalities/E-Government/Human Rights/Health And Safety)

10.1 None

11.0 RELATED DECISIONS AND ANY OTHER RELEVANT FACTS

11.1 None.

Background Papers: None

Contact Officer: Head of Corporate Services
01684 272002 graeme.simpson@teWKesbury.gov.uk

Appendices: Appendix 1 – Audit and Governance Committee Annual Report 2018/19

Audit and governance committee annual report

2018/19



contents

Message from the chair	1
The role of Audit and Governance Committee	1
Work undertaken by the Committee	2
Audit Committee effectiveness	3
Internal audit peer review	4
Financial reporting	5
Annual summary	5
External audit assurance	5
Counter Fraud Unit	6
Health and safety and safeguarding updates	7
Looking forward	8



Message from the Chair of 2018/19 Audit and Governance Committee



Councillor Heather McLain

Welcome to the annual report of the newly named Audit and Governance Committee. This was the first year I have chaired the committee but it did help that I have been a member of the committee for a few years. I therefore appreciate the committee's breadth

of work and I can dispel the myth it is all about financial matters. I would encourage all members to read the reports presented at committee as they provide an excellent overview of the council's internal control environment.

For example, the committee has received reports from our internal audit team on the Community Infrastructure Levy, Ubico client monitoring, General Data Protection Regulation, Disabled Facility Grants, Project Management, Garden Waste. This is only a small snapshot but demonstrates the coverage across all council services.

We have a small but effective internal audit team who provide assurance to the committee as to what is working well or not. Likewise we receive similar assurance from our external auditors, Grant Thornton. Between the two, they identify where improvements are required in relation to the various systems, processes and procedures operating across the council. With regards to financial matters, it is comforting to report that the committee always receives positive reports on the quality of

financial reporting and that the financial systems supporting these reports are managed effectively. This can be directly credited to the council's Finance team.

One of the key aims during the last year has been to raise the profile of the committee. This annual report, first introduced last year, hopefully helps to do this. The rename of 'Audit and Governance' supported with a revised terms of reference now recognises the full remit of the committee. Moving forward to 2019/20, the increased membership, from seven to nine members should provide new challenge and a new set of 'eyes and ears'. I thank all of the committee for the support they provided me during the year.

Best wishes,

Councillor Heather McLain

The role of Audit and Governance Committee

The role of the committee is an important one. The key role is that of assurance. The committee needs to be assured that the council's risk, governance and internal control environment is operating effectively. Given the council's complexity of services, processes, procedures and policies then there will always be occasions where improvements are required. Where these are identified, then the committee should seek assurance the necessary improvements are monitored and implemented. The assurance provided to the committee comes from a number of sources including internal audit, external audit, the finance team and the Counter Fraud Unit.

Work undertaken by the Audit and Governance Committee

Annual Governance Statement (AGS)

It is a statutory requirement that the council publishes an AGS. In layman's terms, the document reflects the state of play in relation to the council's overall governance arrangements. A review of these arrangements are undertaken by the internal Corporate Governance Group. This is a group comprising senior officers and the Lead Member for Corporate Governance. The AGS recognises improvements made to the governance framework during the year. These include;

- Approval of a new council constitution.
- Approval of a new risk management strategy.
- Implementation of a new corporate risk register.
- Approval of a new workforce development strategy.

The AGS is approved by the committee who then receive progress reports to resolve the issues identified. The areas identified for improvement for 2019/20 are summarised in the table on page 3

Governance issue	Proposed action	Timescale	Responsible officer/group
1 Community Infrastructure Levy (CIL) - governance arrangements	Deliver key internal audit recommendations; <ul style="list-style-type: none"> • Overall governance arrangements to be formalised • Operational processes to be agreed e.g. monitoring, reporting and reconciliation • Greater clarity of S123 list 	September 2019	CIL Working Group (Head of Development as lead officer)
2 Ubico – financial governance	Implement financial governance improvement plan; <ul style="list-style-type: none"> • Explanation of overspend to be provided • Final outturn figure to be reported to June Executive Committee (supported by Ubico officer representation) • Internal audit review • Review of financial controls 	September 2019	Head of Community/Head of Finance and Asset Management
3 Serious Crime Framework – key policy review	Review the following policies; <ul style="list-style-type: none"> • Whistleblowing • Bullying and Harassment • Gifts and Hospitality • Code of Conduct • Anti-Fraud and Corruption 	March 2020	Borough Solicitor/Head of Corporate Services/Counter Fraud Unit
4 Local Code of Corporate Governance	<ul style="list-style-type: none"> • Develop and approve a new code of governance 	March 2020	Head of Corporate Services

Effectiveness of Audit and Governance Committee

It is important the value of the committee is maximised. As mentioned in the Chair's introduction, a desire to improve the committee's effectiveness is shared by all members who sit on the committee. Supported by officers, this work has commenced. For example;

- Introduction of an escalation procedure whereby any concerns raised by the committee can result in the 'call in' of officers. For example, audit recommendations that have not been implemented.
- Development and reporting through the new corporate risk register.
- Updated terms of reference and subtle committee name change.
- Increased committee membership for 2019/20 (7 to 9 members).
- Establishment of an annual report and presentation to council.
- Quarterly update meetings attended by internal audit, Chair of the committee and Lead Member for Corporate Governance.

Moving forward, actions are;

- Training for new members of the committee.
- Introduction of a six monthly committee newsletter that can be circulated to the wider membership.

In terms of operational effectiveness, it is this committee, working hand in hand with internal audit that has driven key improvement initiatives. For example, the highly successful garden waste scheme which has resulted in excess of £830,000 was a direct result of the committee supporting improvements as recommended by internal audit. Additionally, the committee has sought continued assurance regarding the adequacy of the council's client monitoring arrangements of the Ubico contract. As a result, a new suite of key performance indicators have been agreed across partner councils.

Internal Audit peer review

The work of internal audit is pivotal to the committee receiving independent assurance on how well the council's internal control environment is operating. The work of internal audit is governed by a set of standards – Public Sector Internal Audit Standards (PSIAS). It is a requirement of PSIAS that at least every five years internal audit is subject to an independent assessment undertaken by a suitably qualified person.

This assessment took place in November 2017. Following completion of 42 pages of working papers it was pleasing the assessment concluded there were no areas of non-compliance with PSIAS that would affect the overall scope or operation of the internal audit activity. As with any review, a number of recommendations were made to improve the audit process further and these have been implemented during the course of 2018/19. These include;

- Review and update of the internal audit charter.
- Putting in place safeguards to protect the independence of the Chief Audit Executive (Head of Corporate Services).
- Review and update of internal audit documentation.
- Adopting a more risk based approach to internal audit assignments.
- Adoption of a flexible, half year audit plan.
- Review of audit recommendation categorisation.

Overall, it is comforting that the work of internal audit is undertaken in an independent, professional and objective manner. This provides assurance to the committee as to the standard of work being undertaken and they can place reliance upon that work.

Annual summary of Internal Audit work

At each committee meeting, a monitoring report is presented of the areas audited by the internal audit team. Examples of audit assignments completed during the year include; garden waste, council tax, GDPR, e-ordering, fleet management, Ubico client monitoring, serious and organised crime framework, Community Infrastructure Levy. For each area audited, an audit opinion is given on how well it is controlled. It is encouraging that the bulk of opinions conclude either a satisfactory or good level of control.

As the council is responsible for an array of services with varying degrees of complexity, then it should not be unexpected the opinion will not always be positive. In audit terms where the level of control is not as it should be, a 'limited' assurance opinion is given. Where there is a fundamental lapse in control, this can lead to an 'unsatisfactory' opinion. With regards to the latter, it is pleasing to report no such opinions were reached during the course of the year.

In terms of 'limited' opinions, specific areas were identified; garden waste (data retention and stock control of licences), fleet management (lack of annual service report/stock control/usage between partners), Ubico client monitoring (financial governance), Community Infrastructure Levy (governance) and GDPR (privacy statements). Audit recommendations to improve control have been accepted by management and all will be followed up to give assurance they have been implemented.

All recommendations that were due to be followed up in the year were actually followed up.

Financial reporting

The finance bit!! – Committee does receive an element of financial reporting information as follows;

- Statement of Accounts (SoA) – it is a requirement of the committee to approve the council's accounts. This is no mean task as they are technically complex. Excellent training is given by the finance team so the committee can understand the key elements. Committee were greatly impressed to receive a positive report from the council's external auditors, Grant Thornton on the accuracy and promptness of the accounts, particularly as the deadline for producing them had been brought forward.
- Letter of representation – prior to approving the accounts, committee consider a statement from the council's Head of Finance on the principles under which the accounts have been prepared.
- Statement of Accounting Policies and Critical Judgements – in advance of the year-end closedown and preparation of accounts, committee also received a report on the judgements that management have made in the process of applying the authority's accounting policies that have the most significant effect on the amounts recognised in the financial statements.

External Audit assurance

In addition to the work of internal audit, reliance on how well the council is performing is given by the council's external auditors, Grant Thornton. A summary of their findings during the year were as follows;

- They concluded that the council's financial

statements were a true and accurate reflection and took the opportunity to thank the council's finance team for their support and engagement during the review process. No amendments were required to the accounts as a result of their accuracy.

- They were satisfied that, in all significant aspects, the Council had proper arrangements in place to secure economy, efficiency and effectiveness in its use of resources. A word of caution - in their risk assessment they have highlighted the Council must ensure it develops a robust savings plan in order to deliver its annual budgets with sufficient capacity to manage its emerging cost pressures over the duration of its Medium Term Financial Strategy (MTFS)
- A review of the Housing Benefit subsidy totalling £18.7 million led to a minor net amendment of £300. This is another endorsement regarding the accuracy of the council's financial information.

Serious crime framework

The Home Office has produced a Serious and Organised Crime checklist to be used by Local Authorities to assess their serious and organised crime risk. The checklist is intended to be a relatively simple and resource light tool. The checklist was populated during the year and considered by Corporate Management Team, prior to presentation at committee in December 2018. The checklist is broken down across five themes. Each theme is underpinned by a number of questions. Each question is assessed as either 'good', 'acceptable', or 'needs improvement'. The five themes are:

- Awareness, strategy, guidance and training.
- Risk management.
- Communication and information/intelligence sharing.

- Whistleblowing.
- Assurance.

The council is considered low risk, however it needs to remain vigilant and an action plan has been developed to maintain awareness to any potential threat. Only one area was flagged as 'needs improvement' – this relates to general awareness training for those staff involved in purchasing.

Supporting the checklist is a suggested framework for internal audit teams to consider. The framework is essentially an audit programme, asking key questions on activities such as;

- Strategy and awareness.
- Procurement.
- Human Resources.
- Gifts and hospitality.
- Whistleblowing.
- Licensing.

The internal audit team supported by the Counter Fraud Unit will be reviewing these activities and reporting to Audit and Governance Committee on how robust the internal control environment is for each activity.

Gloucestershire Counter Fraud Unit update

The committee receives a six month update on the work of the Counter Fraud Unit (CFU). The CFU works directly on behalf of all the Gloucestershire authorities, West Oxfordshire District Council and other public sector bodies such as Cheltenham Borough Homes. Included within the report to Audit Committee were examples of how the CFU has supported the council. These include;

- Development of a new Corporate Enforcement Policy – this is currently at draft stage and is with Corporate Management Team for consideration.
- Delivery of fraud awareness training for staff and Members.
- Processing and investigation of cases identified through the National Fraud Initiative.
- Full review of the housing list.
- Review of business rates valuation list.
- The CFU is now the single point of contact for all benefit related fraud.
- Assisting with disciplinary investigations.
- Assisting with intelligence for alleged fly tipping offences.
- Programme of training e.g. resilience training, assertiveness and dealing with difficult people, managing contractors safely, asbestos training etc.
- Basic awareness training provided to volunteers.
- The number of reported accidents and incidents are very low.
- Robust reporting mechanisms in place for the key contracts e.g. leisure centre, Ubico.

Health and Safety (H&S) annual report

H&S is a key part of the council's governance framework. As such, committee request an annual report to gain assurance that the council is a safe and healthy place to work. The key messages within the report were;

- The council has a health, safety and welfare policy which is reviewed regularly and supported by a suite of other related policies e.g. managing contractors safely policy, the control of substances hazardous to health, cemetery and memorial safety management, lone working etc.
- An annual action plan is in place.
- Quarterly reporting to corporate management team on both operational and strategic issues.
- The council being awarded the Workforce Wellbeing Charter.
- The Keep Safe, Stay Healthy Group is a positive forum to oversee all operational aspects of the council's health and safety responsibilities.
- The completion of risk assessments for all service areas.

Risk management

During the course of the year, the council's risk management arrangements were reviewed. The Audit Committee have been at the heart of this. Members attended a risk management refresher seminar, recommended to Executive Committee the approval of a new risk management strategy and have overseen the implementation of a new corporate risk register. It is a key role of the committee to gain assurance that the key risks facing the council are effectively managed.

Looking forward

Councillor Vernon Smith takes up the mantle of Chair for 2019/20, supported by Councillor Heather McLain as Vice-Chair. The committee membership has also been increased from 7 to 9 members. There is also a new Lead Member for Corporate Governance, Councillor Mike Sztymiak. One of Mike's key roles will be to oversee the effectiveness of the committee and the internal audit function. In terms of effectiveness, officers will work closely with the new committee to ensure they are appropriately trained to fulfil the committee's obligation and maximise its value.

2018/19 Audit Committee members



Cllr Gill Blackwell



Cllr Kevin Cromwell



Cllr Pauline Godwin



Cllr John Hesketh



Cllr Sue Hillier-Richardson



Cllr Heather McLain
CHAIR



Cllr Vernon Smith
VICE-CHAIR



Cllr Elaine MacTiernan
LEAD MEMBER

2019/20 Audit and Governance Committee members



Cllr Cate Cody



Cllr Kevin Cromwell



Cllr Louise Gerrard



Cllr Pauline Godwin



Cllr Heather McLain
VICE-CHAIR



Cllr Paul McLain



Cllr Helen Munro



Cllr Paul Smith



Cllr Vernon Smith
CHAIR



Cllr Mike Sztymiak
LEAD MEMBER

Mike Dawson
Chief Executive
Tewkesbury Borough Council



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