

TEWKESBURY BOROUGH COUNCIL – DEVELOPMENT MANAGEMENT

Committee:	Planning
Date:	15 March 2022
Site Location:	Wind In The Willows Sandy Pluck Lane Bentham
Application No:	21/01000/FUL
Ward:	Badgeworth
Parish:	Badgeworth
Proposal:	Redevelopment of the site to include demolition of existing dwelling and outbuildings, erection of a replacement dwelling and change of use of land to residential.
Report by:	Dawn Lloyd
Appendices:	Site Location Plan Proposed Site Plan Existing Floor Plans Proposed Ground Floor Plan Proposed First Floor Plan Existing Elevations Proposed Elevations North and East Proposed Elevations West
Recommendation:	Refuse

The application has been called in for Committee determination by Councillor Vines, the Local Ward Member, to assess the suitability of the application given its Green Belt location.

1.0 SITE DESCRIPTION AND PROPOSAL

- 1.1** The application site is located at Wind in the Willows is located off Sandy Pluck Lane, to the north west of the A46 and the settlement of Bentham. Wind in the Willows is a former agricultural worker's dwelling which had condition removed restricting occupancy though the granting of a lawful development certificate.
- 1.2** The application site itself comprises of a dwelling which has been extended and is situated to the north east part of the site. To the west, the site has a pavior drive to the dwelling and a concrete track to the timber stable block with a small concrete yard and outbuilding. To the south lies of the site lies a corrugated metal agricultural style barn building. The site has access to the dwelling onto Sandy Pluck Lane and a gated field access. There are no existing formal boundary treatments across the site. The site is screened by existing trees and hedging to the east, the land to the west of stables and barn building is more open with existing agricultural boundary type fencing.

- 1.3** The application has been submitted with a curtilage plan which includes the stable block and outbuilding along with the dwelling and its immediate garden. From the history of the site and historic aerial photos it is evident that the residential curtilage did not include the stables. At the time of the site visit there were no formal boundaries defining the garden, land around the stables and barn and informal recreation use was evident in parts. However, it is considered that existing residential curtilage of the dwelling does not include the stables and yard, it lies to the north of barn track and is less than indicated by the submitted plan.
- 1.4** The existing dwelling which has been previously extended has a footprint of 120 sqm, gross internal area of 145 sq m and volume of 565 cubic metres. The stables and outbuilding have a footprint of 120 sqm and volume 355 cubic metres. The clad steel portal frame barn has a footprint of 242 sqm and a volume of 945 cubic metres.
- 1.5** A public footpath crosses the site from Sandy Pluck Lane to rear of the stable block and then to south east corner. The application site is situated within the Green Belt. The site is located within Flood Zone 1 and lies outside of any defined settlement boundary.
- 1.6** The application proposes to demolish the existing buildings and erect a two storey five bedroomed dwelling of contemporary design. The proposed dwelling would be sited further from the eastern boundary and centred on the existing access. The residential curtilage would be extended and require a change of use of land in parts. The proposed residential curtilage would be defined by new post and wire stock fencing with new tree and meadow grass planting within and beyond this boundary.
- 1.7** The proposed dwelling has a footprint of circa 367 sq m and gross internal area of 718.9 sqm. The footprint of the proposed dwelling is two and a half times that of the existing dwelling (145 sqm) and would be located outside the of the existing footprint. The proposed dwelling would be sited in part on the footprint of the existing stables (120 sqm). The stables and dwelling have a combined footprint of 265 sqm which is less than the proposed dwelling. Therefore, the proposal has included the demolition of the existing barn which lies beyond the residential curtilage.

2.0 RELEVANT PLANNING

Application Number	Proposal	Decision	Decision Date	Application Number
00/00827/CLE	Certificate of lawfulness for continued occupation of dwelling without complying with agricultural occupancy condition	CONSEN	20.11.2000	00/00827/CLE
T.4089	Outline application for the erection of farm manager's dwelling.	PERMIT	23.04.1963	T.4089
T.4089/AP	Erection of house with garage for farm manager. Construction of vehicular access.	PERMIT	18.06.1963	T.4089/AP
T.4089/A	Erection of a garage. Construction of new vehicular	PERMIT	27.01.1976	T.4089/A

	access.			
T.4089/1	Occupation of dwelling without complying with Condition (c) of planning permission ref: T.4089 dated 23.4.63 for a temporary period (Agricultural occupancy).	PERMIT	08.06.1984	T.4089/1
T.4089/1/A	Occupation of dwelling without complying with condition (c) of planning permission ref: T.4089 dated 23rd April 1963 for a temporary period (agricultural occupancy).	PERMIT	05.08.1987	T.4089/1/A
89T/4089/01/11	Revision of condition (c) to Planning Permission T 4089 to include horsiculture.	PER	27.09.1989	89T/4089/01/11
90T/4089/01/02	Erection of a stable block.	PER	14.02.1990	90T/4089/01/02
90T/4089/02/02	Alterations and extension to provide enlarged living accommodation.	PER	30.03.1990	90T/4089/02/02
00/4089/0827/CLE	Certificate of lawfulness for continued occupation of dwelling without complying with agricultural/horsiculture/forestry occupancy condition	GRANT	03.10.2021	00/4089/0827/CLE
07/01157/FUL	Building incidental to agricultural use (Forage Barn)	NOTPRO		07/01157/FUL
07/00112/ENF	Alleged unauthorised barn requiring planning permission	Allowed at appeal	22.09.2011	07/00112/ENF
08/00252/FUL	Retention of general purpose agricultural building.	NOTPRO	07.02.2012	08/00252/FUL
12/01015/OHL	Install an additional third wire to upgrade the existing 2 wire overhead 11kv line with the length of approximately 750 metres	NOOBJE	08.11.2012	12/01015/OHL

3.0 RELEVANT POLICY

The following planning guidance and policies are relevant to the consideration of this application:

3.1 National guidance

National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG)

3.2 Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) – Adopted 11 December 2017

- Policy SD5, SD6, SD4, SD9, INF 1, INF2

3.3 Tewkesbury Borough Local Plan to 2011 – March 2006 (TBPL)

- Policy HOU7, HOU10

3.4 Tewkesbury Borough Plan 2011-2031 Pre-submission Version (October 2019)

- Policy RES 9

3.5 Neighbourhood Plan

None

3.6 Other relevant policies/legislation

- Human Rights Act 1998
- Article 8 (Right to Respect for Private and Family Life)
- The First Protocol - Article 1 (Protection of Property)

4.0 CONSULTATIONS

Full copies of all the consultation responses are available online at <https://publicaccess.tewkesbury.gov.uk/online-applications/>.

4.1 Badgeworth Parish Council – The Parish Council has concerns that this proposal could be considered over development of the site and an inappropriate development in the Green Belt. If allowed, it could set a precedent for future proposals.

4.2 Land Drainage Advisor – submitted details do not adequately address risk of flooding from surface water and surface water disposal as soakaways may not be a viable solution. However, surface water could be discharged to Normans Brook and a drainage condition required.

4.3 Ecological Advisor- No objection, recommend the following conditions:

- An update site visit will be required to assess the structures for evidence and potential for bats prior to the commencement of work on the site. If further evidence / potential is recorded, further emergence / re-entry surveys will be required to be submitted and approved by the Local Planning Authority.
- All works to be in accordance with Ecological Appraisal (All Ecology, August 2021), Great Crested Newt eDNA Analysis (All Ecology, August 2021) and Dusk Emergence and Pre-Dawn Re-Entry Surveys for Bats (All Ecology, August 2021)
- A plan to submitted and agreed detailing the location and specification of the ecological enhancements.
- External lighting plan to be submitted and agreed.

4.4 Footpath Officer - No objections to the proposal to relocate the footpath

4.5 Highway Authority – No objection the proposal would not have an unacceptable impact in terms of highway safety and would have no serve impact of the highway network.

5.0 PUBLICITY AND REPRESENTATIONS

Full copies of all the representation responses are available online at <https://publicaccess.tewkesbury.gov.uk/online-applications/>.

5.1 The application has been publicised through the posting of a site notice for a period of 21 days.

5.2 Three letters of support have been received:

- New design is an improvement over the existing buildings, it is looks unimposing and more in keeping with the surrounding areas.
- the relocation of the dwelling further back from the lane will utilise the plot better and improve the feel and visual impact of the lane.
- The relocation of the foot path is much better and easier for walkers to follow.

6.0 POLICY CONTEXT

6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Section 70 (2) of the Town and Country Planning Act 1990 provides that the Local Planning Authority shall have regard to the provisions of the Development Plan, so far as material to the application, and to any other material considerations.

6.2 The Development Plan currently comprises the Joint Core Strategy (JCS) (2017), saved policies of the Tewkesbury Borough Local Plan to 2011 (March 2006) (TBLP), and a number of 'made' Neighbourhood Development Plans.

- 6.3** The Tewkesbury Borough Plan (TBP) has reached an advanced stage. The Pre-Submission TBP was submitted for examination in May 2020. Examination in Public (EiP) took place over five weeks during February and March 2021. The examining Inspector's post hearings Main Modifications letter was received on 16th June 2021. In this letter the Inspector provided his current view as to what modifications are required to make the Plan 'sound'.
- 6.4** A schedule of Main Modifications to the Pre-submission TBP were approved at the meeting of the Council on 20th October 2021 and is now published for consultation as the Main Modifications Tewkesbury Borough Plan (MMTBP).
- 6.5** Those policies in the MMTBP which were not listed as requiring main modifications may now attract more weight in the consideration of applications, with those policies which are subject to main modifications attracting less weight depending on the extent of the changes required. The TBP remains an emerging plan and the weight that may be attributed to individual policies (including as with modifications as published for consultation) will still be subject to the extent to which there are unresolved objections (the less significant the unresolved objections, the greater the weight that may be given) and the degree of consistency with the NPPF (the closer the policies to those in the NPPF the greater the weight that may be given).
- 6.6** The relevant policies are set out in the appropriate sections of this report.
- 6.7** Other material policy considerations include national planning guidance contained within the National Planning Policy Framework 2021 and its associated Planning Practice Guidance (PPG), the National Design Guide (NDG) and National Model Design Code.

7.0 ANALYSIS

Principle of development

- 7.1** The proposal is to replace the existing dwelling on the site, a former agriculture dwelling on agricultural land. In 1989 the agriculture occupancy condition was amended to also include horsiculture and in 2000 a certificate was granted which established the condition had not been complied with in excess of 10 years. Therefore, the existing dwelling is a market dwelling. The site history identifies a more limited curtilage for the dwelling with the stable block and barn in paddock land beyond and therefore the proposal includes the change of use of part of the paddock/field to residential curtilage.
- 7.2** Saved Local Plan Policy HOU7 supports replacement dwellings in locations where the construction of new houses would otherwise be unacceptable provided the dwelling is of a similar size and scale to the existing dwelling, respects the scale and character of existing property in the area and has no impact on the landscape.
- 7.3** Policy RES9 of the Pre-submission Tewkesbury Local Plan and its main modifications (MMTBP) considers that the replacement dwelling respects the size of the plot and the scale and character of existing characteristic property in the area. The reasoned justification states that replacement dwellings should respect the scale of the existing dwelling and should not involve significant size increases. However, this 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. In addition, the 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.

- 7.4** The proposal would be larger than the existing dwelling and therefore not comply with policy HOU7. The predominant character of the area is that of detached dwellings of more modest scale, traditional form and character. The dwelling would be of contemporary design occupying a more prominent position within the plot which would appear as an alien design, and form, and would be an incongruous feature in the rural landscape. The existing dwelling has been previously extended to the sides and rear therefore the permitted development PD fall back is limited. The existing residential curtilage would require to be extended to facilitate the development. Therefore, the proposal would not respect the scale of the existing plot or dwelling. The site lies within the Green Belt the percentage increase over the existing dwelling would be 153% increase in footprint, 191% increase in gross internal floor area and 228.5.% increase in volume. The proposal would be disproportionately larger than the existing dwelling and does not comply with Saved local plan policy HOU7 and the Pre-submission Tewkesbury Borough Local Plan policy RES 9.
- 7.5** The stable block and barn lie outside the residential curtilage and the proposal requires the change of use of the stables its yard and part of the adjacent paddock/field to residential curtilage. This is considered under saved local plan policy HOU10 and policy RES11 of the Pre-submission Tewkesbury Borough Plan and its main modifications (TBP).
- 7.6** Policy HOU10 of the saved local plan considers the change of use to residential curtilage will not be permitted where there is adverse environmental or visual impact on the form, character or setting of the settlement, encroaches into the surrounding countryside and the form of the extension would be incongruous with the characteristic pattern of surrounding gardens. Within the Green Belt such proposals will not normally be permitted given the objectives of the designation. This policy is taken forward under RES11.
- 7.7** The previous internal fences have been removed from the site and as considered previously the residential curtilage is not as extensive as indicated in the curtilage plan submitted. The site is remote from the main form of residential properties along Sandy Pluck Lane, the nearest dwelling is a former agricultural worker dwelling to the north. The change of use of the land to residential curtilage would create a substantial plot which encroaches on to the surrounding countryside which is contrary to the one of the purposes of the Green Belt. Therefore, the extension to the residential curtilage would not be acceptable in this regard.

Green Belt

- 7.8** As considered above the proposal as a replacement dwelling would be not comply with para 149 d) of the National Planning policy Framework (amended 2021) and would be inappropriate development in the green belt.

The Agent consider the proposal forms an exception under para 149 g) the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:

– not have a greater impact on the openness of the Green Belt than the existing development;

The NPPF defines previously developed land as:

“Previously developed land: Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the

whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.”

- 7.9** Land which was last used for agriculture or forestry buildings is excluded from previously developed land. The Agent refers to appeal APP/G1630/C/11/2154396 which was allowed for the barn which the Inspector acknowledge the primary use of the barn was the equine business and therefore inappropriate development in the green belt, and concluded that the barn must be regarded as having a harmful impact on the openness. Very Special circumstances to justify the proposal was given as diversification. The Inspector considered that while retaining the stud as the core of his business, the Applicant had developed an agricultural enterprise that needs protection for animals other than his horses and which requires storage for hay, straw and machinery.
- 7.10** In accordance with the appeal decision, it is considered that the stables and the barn constitute inappropriate development in the Green Belt. They are permanent structures and therefore, can be considered along with the curtilage as previously developed land. However, this does not include the grass land around the barn and stables. The NPPF’s definition of previously developed land states that it should not be assumed that all the curtilage should be developed. The proposal would include the whole of the curtilage of the dwelling as well the stables and barn and potentially exceed the requirement of previously developed land.
- 7.11** The main test is if the partial or complete redevelopment of previous developed land would not have a greater impact on the openness of the Green Belt than the existing development. In the event that the proposed redevelopment works do have a greater impact on the Green Belt’s openness, development must still be considered inappropriate and planning permission must be refused unless there are "Very Special Circumstances to justify inappropriate development, which clearly outweighs the harm that would be caused by reason of inappropriateness, and any other harm".

Impact on openness

- 7.12** Government Guidance states impact on openness is a matter of planning judgement in each case but that;
- “i) openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;
- ii) the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and
- iii) the degree of activity likely to be generated, such as traffic generation.”
- 7.13** The Landscape & Visual Impact Assessment considers the structures on the site are of low architectural value and create an urbanising element. Stables, barns and agricultural buildings are utilitarian in design and familiar features of the countryside and not considered urbanising elements.

- 7.14** The Applicant's case compares the footprint, GIA and volume of the proposed dwelling with the buildings to be demolished and existing areas of hardstanding. The proposal would be a large two storey consolidated form in a more visually prominent position on the site towards the north western boundary. It would be greater in height than the existing barn and stables on the site. The proposal has significant areas of hardstanding and the residential curtilage to the south west would be increased and therefore the residential development would encroach further onto the open countryside. The existing dwelling and barn are screened by existing trees and hedges on east and southern boundaries, with stable block more evident in more open views towards the west. It is proposed to relocate the public footpath and provide additional landscaping proposed to reduce the visual impact of the development in the public realm. The proposed landscaping would enclose the site from the surrounding fields which in turn impacts openness. It is considered that the proposal would form a substantial enclosed plot not well related the existing settlement pattern and would form an encroachment into the open countryside.
- 7.15** With regard to impact on openness, a case has been made with regard to permitted development as a fallback position. However, this would have to have a realistic prospect of being implemented to form a fallback position. In addition, the existing dwelling has already undergone previous extensions and the curtilage is considered less than demonstrated. A case has not been presented for further permitted development which would be implement and therefore this cannot be considered a realistic prospect.
- 7.16** In conclusion, it is considered that the proposal would have a greater impact upon openness due to its siting, size and mass and therefore the proposal would be inappropriate development in the Green Belt.

Very special Circumstances

- 7.17** In R (Boot) v Elmbridge Borough Council 2017 it was stated that if a development causes any harm to the openness of the Green Belt, then it would be inappropriate development despite the amount of harm, and it would be necessary to see if there were "very special circumstances" to justify the development.
- 7.18** *The very special circumstances proposed include the removal of the large barn on the site, a replacement dwelling of contemporary design, new landscaping and realignment of the public right of way.*
- 7.19** The Agent considers the removal of the existing buildings and their replacement with a single building would reduce the impact on openness. It is considered that this is a judgment with regard to openness and does not amount to very special circumstances which is more policy based.
- 7.20** Another reason is given is replacing the existing buildings on the site with a stand alone dwelling of contemporary architecture. The stables and barn are functional in design and appropriate to the rural setting. The existing dwelling is modest in scale and form. The design of the proposed dwelling is not considered of exceptional quality under para 80 of the NPPF. The contemporary design, size of the plot and the siting of the dwelling would form an incongruous feature in the wider landscape.
- 7.21** Further reasons include additional soft landscaping and realignment of the public right of way. Although this would provide some benefits in terms of biodiversity and screening it is required to facilitate the development and provide the high bar justification for the development.

- 7.22 It is considered that there are no very special circumstances advanced that outweigh the harm to the openness of the Green Belt.

Design and Landscape impact

- 7.23 Policy SD4 within the JCS provides that new development should respond positively to, and respect the character of, the site and its surroundings, enhancing local distinctiveness, and addressing the urban structure and grain of the locality in terms of street pattern, layout, mass and form. It should be of a scale, type, density and materials appropriate to the site and its setting.
- 7.24 Saved Local Policy HOU 7 states that the rebuilding or replacement of existing dwellings to be of a similar size and scale to the existing dwelling, respects the scale and character of existing characteristic property in the area and has no adverse impact on the landscape.
- 7.25 Policy RES9 of the MMTBP (2021) states proposals for a replacement dwelling shall respect the size of the plot and the scale and character of existing characteristic property in the area.
- 7.26 Policy SD6 states that proposals will have regard to local distinctiveness and historic character of different landscapes.
- 7.27 The existing development of the former agricultural worker's dwelling, agricultural style barn and stables are development of relatively simple form and modest scale and are features typical in the rural landscape. The proposal would be a standalone detached dwelling of contemporary design on a large plot within the open countryside. The materials would be a mix of brown treated copper cladding, dark stained timber effect cladding, dark grey aluminium cladding and buff facing brickwork. Windows and doors would be powder coated aluminium.
- 7.28 The predominant character of the area is that of detached dwellings of more modest scale, traditional form and character. The referenced dwelling of Hunt Court Farm is of a contemporary design however, it respects the agricultural cues of its context and integrates with existing built form on the site. The proposal would be a large contemporary dwelling (volume 1856 m³) significantly larger than the existing dwelling and would occupy a more prominent position on the site. It is considered that the proposal would appear as an alien design, and form, and would be an incongruous feature in the landscape. The proposed soft landscaping would enclose the site and rerouting of the public footpath would screen the development from public vantage. It is considered that the site would be more residential in character and the mitigation of the soft landscaping would not outweigh the harm in this regard.

Access and highway safety

- 7.29 Section 9 of the NPPF relates to the promotion of sustainable transport and specifies that in assessing specific applications for development, it should be ensured that safe and suitable access to the site can be achieved for all users. Policy INF 1 of the JSC reiterates this advice. Policy trac9 of the Pre-submission Tewkesbury Borough Plan (PTBP) states that proposals need to 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.

- 7.30** The existing access which currently serves the Wind in the Willows. There is room on site for the parking of vehicles and associated turning and manoeuvring. The Highway Authority have no objection to the proposal with regard to highway safety and impact on the highway network.
- 7.31** A public footpath would across the site would be required to be diverted and a shorter route towards the southern boundary proposed.

Residential Amenity

- 7.32** JCS Policies SD4 and SD14 require development to enhance comfort, convenience and enjoyment through assessment of the opportunities for light, privacy and external space. Development should have no detrimental impact on the amenity of existing or new residents or occupants.
- 7.33** Due to the distance and orientation of the proposed dwelling with the nearest residential dwelling to the north, and the landscaping proposed there would be undue impact upon the amenities of the neighbouring residents.

Drainage and Flood Risk

- 7.34** Policy INF 2 of the JCS seeks to prevent development that would be at risk of flooding and increase flood risk elsewhere. The application site is location within flood zone 1 (low risk) however, consideration has not been given to the risk from surface water flooding.
- 7.35** The site may not be suitable for soakaways as indicate in the Drainage Strategy however, the proximity of the Normans Brook does provide a solution. Therefore, a condition is recommended for details of surface water drainage scheme to be submitted and agreed in writing prior to commencement of development.

Biodiversity

- 7.36** The NPPF sets out, inter alia, that planning decisions should minimise impact on and providing net gains for biodiversity. Policy SD9 of the JCS seeks to protect and enhance biodiversity in considering development proposals.
- 7.37** An Ecological Appraisal, Great Crested Newt eDNA Analysis and Dusk Emergence and Pre-Dawn Re-Entry Surveys for Bats have been submitted. Due to the age of the surveys an updated site visit was undertaken which found no further changes on the site. Our Ecological Advisor considers the proposal acceptable subject to conditions for the works and mitigation to be in accordance with the submitted ecological reports, a plan of the location and specification of the mitigation to be submitted, details and plan of external lighting to be submitted and agreed with the Local Planning Authority.

8.0 CONCLUSION AND RECOMMENDATION

- 8.1 The replacement dwelling would be significantly larger than the existing dwelling on the site and not would respond the existing plot and as increase in the residential curtilage is required which encroaches on to the open countryside. The redevelopment of previously developed land would impact openness of the green belt and no very special circumstances have been present which outweigh the harm.
- 8.2 The proposed dwelling would fail to achieve a suitably high standard of development appropriate to the site and location. The proposed design and scale of the proposed dwelling would be conspicuous and unduly prominent to the detriment of the rural character and setting of Sandy Pluck Lane. The very limited public benefits of a new replacement dwelling would not outweigh the harm to the Green Belt of the surrounding area. It is therefore recommended that planning permission is **Refused**.

Reasons for refusal

1. The proposal would represent inappropriate development in the Green Belt which compromises its open character and purpose. The applicant has not demonstrated very special circumstances which clearly outweigh the harm to the Green Belt caused by the inappropriateness of the development and other harm. The development would therefore conflict with Policy SD5 of the Joint Core Strategy (December 2017) and the provisions of the National Planning Policy Framework (2019).
2. By virtue of its design, form, scale and layout the proposed development would appear conspicuous and unduly prominent and would fail respond positively to or respect the character of the site and its surroundings in this rural location. The proposal would fail to achieve a high-quality design, and would fail to protect landscape character, contrary to Policy SD4 of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011-2031 (2017), Saved Local Plan Policy HOU7 (2011), Policy RES9 of the Pre-Submission Tewkesbury Borough Plan 2011-2031 (2019) and the principles of the National Planning Policy Framework.