

Tewkesbury Garden Communities

Charter Consultation

Response Report

Date: February 2024

This report covers the responses from the recent consultation on the charter document for the garden communities development.

The charter was presented to the governance structure at the various meetings in December 2023 and through these was agreed to publish for wider consultation. The consultation officially closed on Wednesday 31st January 2024 and this report includes the comments received with a response.

Many of the comments received cover the many longer-term processes for example the local plan development – strategic and local plan (SLP) and specific planning applications. Whilst these points may not necessarily be included within this high-level charter document, they will continue to be considered as those other processes continue/develop.

The charter document itself, based upon the comments received will be reviewed and a further version generated with any changes recommended for presenting to Council to be considered for endorsement/adoption – see relevant Council paper.

Of note is that the charter will continue to evolve and whilst this version is a 'line-in-the-sand' version, over the development timeline the document will continue to be reviewed and further versions may consequently be proposed/issued.

Table 1:

Comments received from the questionnaire with the relevant response/action.

#	Q1. Did you have any problems reading or understanding the charter? What would have helped to make it easier?	Q2. Recent engagement sessions highlighted the need to update the programme's vision (featured on page 6). Would you like to see anything added or changed in the existing vision? What would you like to add or change?	Q3. Do the development principles include everything you would like to see from Garden Communities' development? What is missing?	Q4. Are there any other comments you would like to make on the charter?	Response/Actions
1	No	No	<p>No</p> <p>Commitment to internet connectivity is not strong enough. High speed broadband is often defined by the companies as a copper connection offering up to 25MBps.</p> <p>The garden community should commit to offering fibre internet connection at Gigabit speeds.</p> <p>With the Cyber Central development just down the M5, many of those working there will choose to live in the garden town instead and will need internet that is actually</p>		<p><i>Noted, the wording on page 16 will be changed to strengthen the commitment to high speed and fibre internet connection.</i></p>

			fast rather than Openreach fast.		
2	No	Yes Bridleways to be mentioned	Yes	A lot of the wording is just saying the same thing over & over again.	Public rights of way (which includes bridleways) are a key component to the consideration of development within the Garden Community. <i>Noted, we will remove unnecessary repetition from the document, although there are elements of the principles which are interconnected.</i>
3	No	Yes A greater emphasis on delivering a strategic traffic solution which minimises impact on the communities that border the development area. Not all community residents will remain local and a charter statement on managing impact on traffic volume on the limited road network (A46 E & W, A435) should be referenced in the charter.	Yes	Consequential impact on the wider, boundary villages/communities and inclusion of a statement to manage expectations by and impact on these communities would be welcome.	Managing the impact on existing communities is a key priority for the Garden Communities. This is covered in our principle 'Respect existing communities and reflect local character'. The charter will not cover the details of a traffic solution as it is a high-level document, however the importance of sustainably managing traffic is covered under our principle 'Sustainable wider connectivity'.

4	No	<p>Yes</p> <p>Infrastructure should be in place before any homes built.</p> <p>Alternative to A46 should be in place in order to make the very best of this opportunity to make this an outstanding Garden town.</p>	Yes	<p>Architecture of Garden Town needs to fit in with what Tewkesbury and Cotswolds is famous for so NO more sprawling three storey brick buildings crammed together in narrow streets.</p> <p>Pretty buildings and homes which reflect this area, incorporating water and open green spaces for all ensuring this Garden Town will be the place to live! Large open areas which will be well maintained for all to use.</p>	<p>We agree and support your comments. High quality architecture and design which reflects the character of the area is important to the Garden Community. This is covered within our principles 'A strong identity and character of place', our principles also include 'Interconnected water infrastructure and 'Great green spaces for people and wildlife'.</p>
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<p>5</p>	<p>YES</p> <p>It's too long, you need to realise that the public will see a 20 page document and be completely turned off. You have spaced it out far too much and you have areas when the same or similar text is being used, with some of it being too wordy unnecessarily. If you are not getting the feedback from the public that you want then this is probably the main cause.</p>	<p>Yes</p> <p>The strategy in how you are going to prevent piecemeal development taking over the garden communities development plan needs to be included into this document. There is a level of great uncertainty in the length that this plan will come to fruition will be beaten by independent developers, which ultimately will lead to the public raising concerns that your ideas are nothing more than a waste of tax payers money, please be clear this is a significant point that you need to address.</p>	<p>No</p> <p>The principles need to be slimmed down, the need to not overlap with the same or similar content. Less photos and trying to make it pretty than bullet points will help the public grasp the principles more effectively.</p>	<p>You're asking for public opinion. I gave you formal feedback concerning your "drop in" stand that you had in Tewkesbury town centre and you didn't take a single point forward, when the drop out format went into the local parish/communities. When the formal Garden review took place I asked you to involve the public to get a clear understanding of our thoughts and you ignored that. Therefore I have little confidence that asking for feedback via this questionnaire will lead to any change, with the premise the TBC know best and this is a tick box, lip service exercise. There will be a point where a more formal approach via local media may be necessary before TBC understand that consultation/listening is</p>	<p>Following the gateway review for the Garden Community programme TBC have been running further public consultation events and have set up a new governance structure which includes community representatives. We provide response reports including 'you said' and 'we did' responses. <i>Repetition within the Charter document will be assessed and removed where possible, accepting that some overlap of principles is inevitable and necessary.</i> The Council encourages a holistic and comprehensive approach to the delivery of the Garden Town, with a consistent approach to design. That is why we are producing documents such as the charter, to encourage and support this approach. The council cannot prevent landowners/ developers submitting planning applications but we encourage all the landowners within the Garden Community area to work with us in meeting our aspirations and principles.</p>
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				<p>about understanding the public's concern and have meaningful actions to show that you actually care and do something when the public give you feedback.</p> <p>So my suggestion is from what ever feedback that you get from this questionnaire, that you provide feed back under the following headings:</p> <p>"You said"</p> <p>"We listened and we did"</p> <p>But why am I now wondering if this was just a waste of my time!</p>	
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6	No	No	Yes	<p>Really disappointed that there is little to no mention of young people . I understand that there's a lot of focus on "community" but it feels very much like there's no consideration here for the young people and their families who will eventually be residents. Thinking about the future workforces in 10/20 years time and the developments happening in the region it's likely that aerospace and cyber security will be the largest employers and I'm not sure the development considers what those 21-35 year olds will need. There's a small mention of co-working and living/play but what about makerspaces (which are the new libraries), and arts and culture venues?</p>	<p>The Garden Community aims to provides a comprehensively planned community which provides for all the services and facilities which all members of the community can benefit from young and old. This is covered under our principle 'Integrated live, work, play communities. <i>We agree with your comments regarding 'markerspaces and arts and culture venues and will consider how this principle can include more emphasis on those type of facilities.</i></p>
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<p>7</p>	<p>No</p>	<p>Yes</p> <p>The previous version included the land north of Mitton within the scope. I believe 500-1000 houses are still planned for this area so would seem a missed opportunity to exclude this development from the principles of the scheme. It will directly adjoin Tewkesbury and link to the new developments via Hardwicke Bank Road.</p>	<p>No</p> <p>There seems to be a belief that design will result in everyone walking, cycling or catching a bus to wherever they want to go. Reality is that cars (EV or not), will be the preferred means of travel and that the distance between the connected communities will be the main influence of travel. I would like to see the charter recognise that reality more.</p>	<p>Understanding that all projects start with a vision - will be interested to see the detail on bringing to fruition. It's a nice document but the charter appears to focus more on principles rather than a commitment to deliver anything specific. Apologies for being a doubting Thomas...</p>	<p><i>Whilst the charter is not site specific the Mitton area will continue to be assessed.</i></p> <p>Well-designed places can encourage walking, cycling and public transport use by the way that they are laid out and connected. This is our ambition to reduce car usage where possible, but this does not mean that the car will not be considered in the new development. The charter is a high level document with a focus on principles. Further work in the future will be required to draw out the details.</p>
<p>8</p>	<p>No</p>	<p>No</p>	<p>Yes</p>		
<p>9</p>	<p>No</p>	<p>Yes</p> <p>The impact of climate change should be considered in an area already prone to flooding. Relying on historic data is useless as it is not predictive. Worsening weather conditions and rising sea levels need to be factored in with some attempt at future proofing.</p>	<p>No</p> <p>The nature of development around the town is dictated by the flood plain (as it is now). Increased fragmentation of development caused by future changes to the flood plain will make it very difficult to provide any sort of cohesive structure for services like schools, doctors etc. The existing town centre will just be reduced to a coach trip stop to see the Abbey. Satellite clusters will find it hard to relate to each other or the historic town.</p>	<p>At the end of the day I expect TBC will tinker with the wording and represent the plans that lost so many Tories their seats. The Lib Dems will hail it as a "Brave New World" and the developers will be laughing all the way to the bank. I appreciate this may seem a tad cynical but you always tend to learn from your experience. I feel sorry for the planners as they are pulled in all directions by the amateur members but it's the electorate that</p>	<p>Sustainability to mitigate the impact of climate change is a key part of the vision for the Garden Community. Interconnected water infrastructure, is one of our principles and this covers mitigating the impact of surface water run off and flooding. Connectivity with the existing town centre is a key consideration and challenge for the Garden Community.</p>

				will suffer the consequences not them.	
10	No	Yes It is unclear how you envisage Tewkesbury becoming the hub which serves 10,000+ homes and businesses located 4+ miles to the east. How will delivering Garden Communities make Tewkesbury the hub that drives the success of the Borough?	No There is no mention of new employment opportunities.	The aspiration of the A46 becoming a more attractive route for walking and cycling can only be realised once the Ashchurch Bypass has been delivered which will not be before 2036, whereas the timeline show development (house building) beginning 10 years earlier, in 2026. There is no mention of how increased provision of secondary education, healthcare (hospital, GPs, dentists), supermarkets etc will be accomplished.	The Charter is a high level document focusing on principles, integrated live work, play communities covers the provision of employment opportunities, as well as services and facilities such as healthcare education and retail etc. The Garden Community will be a part of Tewkesbury Town and connections with the town centre are an important part of that. Further work and though the planning system will consider the detail of this and the delivery of services and facilities.
11	No	No	Yes		
12	No	Yes Reference to social housing being included in the Garden Communities Charter	No Reference to housing types - rented and owned is mentioned but I would like specific commitment to a minimum Social Housing	In principle I like the commitment to green developments and carbon neutral homes. I am pleased to hear that Tewkesbury's current residents are being	Affordable homes' is the term which includes, social rented and shared ownership houses. The provision of which is covered by planning policy for all developments.

			provision to be sought from developers.	considered and included. Can we ensure that this stays on track - we are updated regularly and contractors and developers are held to account.	
13	No	No	Yes	<p>Whilst I understand the need for housing the infrastructure needs to be in place to support this BEFORE major house building takes place.</p> <p>We need better roads (we all know the A46 is a nightmare as it stands), we need more dentists and doctors. We need a better supermarket. We need more control over the rivers and streams, cleaning them, maybe widening them to cope with more water that will have to flow somewhere.</p> <p>It also appears that the plan is going to be very piecemeal. Already a developer wanting to build 175 houses at the</p>	It is the aspiration of the Garden Community that infrastructure is delivered early to support the communities, we will add into the principle 'Integrated live, work, play communities' regarding the early delivery of those facilities. 'Integrated water infrastructure is a key principle which supports enhancement of our blue infrastructure (rivers and streams). TBC cannot prevent landowners/developers submitting planning applications but by producing documents such as the charter and our masterplan we can help encourage a comprehensive and coherent approach to the development.

				<p>back of Pamington village, why isn't this on the plan you shared. Where's the joined up thinking of incorporating all this together? You may have grand plans, but it's all going to be built piecemeal and the developers will get out of doing everything they can.</p>	
14	No	<p>Yes</p> <p>Specific costed and detailed plans for how you will solve the current traffic congestion, before massively adding to it</p>	No	<p>Truth, honesty and realism are sadly lacking from this charter, sadly nothing new from the Council - whatever party controls the decision making.</p> <p>The charter is a complete joke because the council have failed to identify 5 years of housing supply meaning developers can obtain planning for developments wherever they want because of the incompetency of the Council.</p> <p>The mention of putting in road infrastructure to cope with the new</p>	<p>Tewkesbury Borough Council has the ambition that development is of the highest quality and is well designed to meet the growing needs of the Borough in a sustainable way. It is the role of the council to not only identify land to meet this growth but to also help positively shape that growth. This document sets out that vision and is the start of a pro-active approach to managing the change that is happening in this area. Supporting the development in this area with improved infrastructure is a key principle for the Garden Community. Ensuring that development is well designed and respects the character of</p>

				<p>housing developments is disingenuous - there are no costed plans whatsoever for a road to take traffic away from the A46 and the development already allowed means this road is frequently a car park. The Council know the only way to fund such a road is to allow even more development on greenfield land to the south of planned developments and that will see Tewkesbury joined with Bishops Cleeve and Cheltenham, completely losing the individual identity of these areas and creating the next step on the way to joining with Gloucester that has already started with the continued development along the the A38. No-one except the Council wants this to happen yet you push ahead with over development that will increase flooding issues</p>	<p>existing villages and towns is also covered in our principles. Enhancing our blue infrastructure and mitigating surface water run off in a sustainable way is also covered in our principles. Designing for walking a cycling and public transport can discourage car usage but cars are considered within the plans for development. There is no mention of banning on street parking. It is expected that people will work outside of the Garden Community as well as within and traffic flows will be mitigated and managed as appropriate. It is of great benefit that there is a train station at the heart of the garden community.</p>
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				and congestion. It is an unrealistic pipe dream that those living in the new communities will not choose car travel above walking or public transport, and as for banning on street parking, we'll see how long you manage to keep that in the plan! The new communities will not create employment for all those living in them and car traffic flows will massively increase as the inhabitants travel to their jobs in Cheltenham, Gloucester, Bristol, Birmingham and further afield	
15	No	No	Yes		
16	No	Yes I would like a less woolly document	No More specifics, i.e. 'Great green spaces for people and wildlife' what does that mean?	I believe that there needs to be a greater specific recommendations, i.e. 'New homes and public buildings that reduce the need for energy. This includes the use of energy-efficient building materials and Passivhaus design	The charter is a high-level vision document based around our principles and as such will not cover such details. We agree with the need for such details and specifics and this is the focus of further work on design guidance.

				techniques', just how efficient should the new properties be. A recent presentation from the Developers indicated that they (the Developers) will NOT meet Passivhaus design techniques.	
17	No	Yes With the massive increase in vehicular traffic utilising Northway Parish as a "rat-run" to access the M5, A46 and various industrial sites at Ashchurch there is zero consideration to the health and well-being to the residents of Northway Parish and evidence has to be provided that details that this scheme does consider Northway Parish AND its residents.	No With the massive increase in vehicular traffic utilising Northway Parish as a "rat-run" to access the M5, A46 and various industrial sites at Ashchurch there is zero consideration to the health and well-being to the residents of Northway Parish and evidence has to be provided that details that this scheme does consider Northway Parish AND its residents.	With the massive increase in vehicular traffic utilising Northway Parish as a "rat-run" to access the M5, A46 and various industrial sites at Ashchurch there is zero consideration to the health and well-being to the residents of Northway Parish and evidence has to be provided that details that this scheme does consider Northway Parish AND its residents.	Respecting existing communities and sustainable wider connectivity are key principles within the charter. Details on traffic mitigation and other measures are for future planning applications by developers and are not covered in this document.

18	No	Yes There appears to be no engagement with locals, this seems to be a done deal. As you can presently see from the local media most of the area that you intend to use for this garden town is under water. I would suggest you relocate this to higher ground within the borough such as between Shuthonger to Twynning. Also there are no clear plans for improving the infrastructure, new supermarkets, schools, doctors, dentists etc	No There is no greenbelt around the proposed area to stop further expansion in the next round of building planning.	This hasn't been very well thought out at all, this just appears to be a 'not in my back yard project' and Northway/Ashchurch lost out. I implore you to look at the local news with the flooding, if you build on this land the flood water has to go somewhere, you just can't make it disappear, it will end up in properties that don't currently flood.	Following the gateway review of the Garden communities programme, the council has implemented a series of engagement events and a new governance structure which includes representatives from the local community. Flood management and surface water drainage mitigation are covered within our principle 'interconnected water infrastructure'. The area of the Garden Community that will be developed is not within a flood zone. Our principle 'integrated live, work play communities includes for the provision of facilities and services and infrastructure necessary for a thriving and sustainable community.
19	No	No	No A need for these principles to extend to infrastructure policy adopted by other agencies (e.g. Gloucestershire County Council, National Highways) as it affects the new Garden Town.	The principle (page 10) to respect existing communities states that "We must see the protection and enhancement of historic villages and their landscape". This is very welcome; however, on evidence seen to date, this is not being followed by the Gloucestershire County Council team in their consideration of a strategic traffic solution (page 15). Over a	We are working closely with the team at Gloucestershire County Council.

				<p>number of years, new bypass proposals have been looking to position a new dual carriageway bypass (to the A46) along the route of the A435. This would have significant adverse consequences for the village of Teddington (environmental, road safety and dislocation from local services). We would like to see Tewkesbury Borough Council and the Garden Town team influence bypass route proposals so that they also adhere to the Programme Charter.</p>	
20	No	<p>Yes</p> <p>The quality & standard of the legacy you leave behind by what is delivered.</p>	<p>No</p> <p>More emphasis on utility infrastructure, roads that are designed not to flood, or highway run off that floods properties. The standard of infrastructure delivery that won't leave systems under capacity.</p>	<p>Some stakeholders are not statutory consultees and they should also be involved. Developer standards meet or exceed the design standards for the work they complete. E.g installing SUDs, Oh we've planned them in - actual delivery is to a minimum design, sides are steep - no bio</p>	<p>This charter is a high level document based around our principles. The details and the delivery of infrastructure is covered by the planning system when detailed proposal are being considered.</p>

				diversity. Infrastructure has capability for expansion. Interconnecting infrastructure is up-sized by developers to get capacity correct for services.	
21	No	No	Yes	I would like to see more information about how Tewkesbury will be enhanced to form a hub for the communities. There are probably going to be services based in Tewkesbury Town Centre which will be needed by residents in the new communities, such as the health services at Tewkesbury Hospital, dental services and a cemetery, etc. Will the Garden Communities project provide funding to enhance and enlarge these to meet the needs of the larger population?	Links into Tewkesbury Town centre are an important part of our aspiration for sustainable wider connectivity. Allowing new residents to access the services within the town centre, with increased patronage giving the town an economic boost. Funding for infrastructure and services are considered within planning applications for development as they come forward.

22	No	Yes The vision needs to be less Tewkesbury-centric.	No Cemeteries are missing, also places of worship and wider health care facilities and mental health provision, pubs, banks, libraries, reading rooms, community centres, banking facilities, car clubs and provision for electric vehicles. Sustainable transport connections to other population centres, eg Bishops Cleeve. Local supermarkets. A requirement to not just meet, but to exceed building standards. Safe and welcoming night-time facilities. Homes for multi-generational living, and 'tiny homes' for single people. Access for emergency services. Places to stay.	Does this charter imply that there could be a new civil parish? Re. point three, prioritise natural flood and water management methods over technical ones.	Integrated live, work, play communities covers the provision for services and facilities that you mention and all others. Sustainable wider connectivity will be added to highlight the importance of links to other centres e.g. Bishops Cleeve and Tewkesbury Town centre. A mixed tenure of homes is covered within the principles further details are specifics are not possible in a high-level charter document. No new civil parish is considered at this stage.
23	No	Yes It needs to ensure any development is future facing and considers future growth but also sustainability and be climate resilient	No The area is a massive access point for people going through from other areas to access work or get through/past to other places. e.g beyond Tewkesbury or the M5. Everything focusses on assuming that people will live and work in the same area and will therefore be able to	There is nothing included or mentioned about EV cars and charging. This is a big issue locally so it would be good to see this mentioned in the principle of 'carbon neutral communities'	Agree this is covered within our principles. EV charging is a level of detail that is not covered in the charter. EV charging is however already a planning requirement for all new homes built.

			travel without a car. Which is great but not always possible.		
24	No	No	Yes		
25	No	No	Yes	Being a local citizen for pat 8 years, with family routes, this project is extremely important to me. i feel it such a important project for the area and i am very excited to see what future plans come from the council. I have contacted the programme coordinator to talk through a couple of concerns and she was incredibly helpful and knowledgeable and was more than happy to listen to me and help with my questions.	Thank you. We are excited for the opportunities that the Garden Community has to deliver positive and sustainable growth in the Borough, meeting the needs of our community.
26	No	No	Yes	Needs to be sympathetic to the historic nature of Tewkesbury	Agree, this is covered under our respect existing communities and reflect local character principle.

27	Yes A better map explaining where everything is	Yes A better map, explaining where the plans are. If one exists please do share.	No An option to ignore this question.	A better map.	Noted - plans are not that detailed yet so better maps will be added in the future.
28	No	No	No Managing water courses doesn't address the fact that the building is taking place on Tewkesbury's remaining flood plains	Environment is far more important than anything else	No development is proposed on the flood plain or in a flood zone.
29	No	Yes would like something like community allotments added (both a shared space and new plots as impossible to get one in Tewkesbury - i have been on waiting list for two years then asked to be removed). Also safety - natural walks and paths are lovely but can be scary at night, how will this be addressed, and how will anti-social behaviour be avoided in secluded areas?	Yes	New homes must have gardens and they must be kept as gardens and not turned into driveways to ensure water can sink into land and not runoff	The Charter is a high level document focusing on principles. Our principle 'integrated live work, play', includes provision for allotments and open space. This document will not go into this level of detail, as it is focussing on high level principles but these details would be considered as part of any planning applications that are submitted.
30	Yes A plan showing the outline of what is going to be come in many years a city. Within the triangle of Cheltenham, Gloucester and Tewkesbury.	Yes The mention of a new sewage system at present sewage is being transported to Gloucester from the Tewkesbury Area	Yes	More emphasis on road structures for the access of emerging services	The charter is a high level document with a focus on our principles. Details of sewage systems and emergency service access, would be covered in any future planning applications.

Table 2 – E-mailed comments

#	Comment	Response
1	<p>The line which reads..</p> <p>Streets designed for people, not cars. Including a maximum 20mph speed limit throughout the garden communities and removing parking from the streets.</p> <p>Can we have 20 mph an hour signage erected within our village also. (Seven Bends) If we are also supposed to be connected then we would also require the speed decrease. As currently 30mph.</p>	<p>Changes to existing roads – including speed limits, will be considered as the garden community development progresses. It is possible – is more likely part of a different process</p> <p>Thank you for your comments, we agree that residential streets should be 20mph where possible. However, this speed limit on existing streets falls under the remit of the County Council and is not therefore something that Tewkesbury can influence.</p>
2	<p>Having read the charter I think the only thing missing, and as there is so much feeling about it locally, the A46 issues seem to be missing and not alluded to which I feel is very important and forefront in a lot of people's minds as they feel nothing should be started until the problem is solved or at least plans put in place Otherwise I feel it meets all the criteria</p>	<p>Thank you for your comments, The charter is a high level document setting out our vision and principles and does not deal with how challenges such as traffic will be mitigated. Details of required mitigation will be dealt with through future planning applications and the Local Plan process as appropriate.</p>
3	<p>Is there anything missing from the charter?</p> <p>"A need for these principles to extend to infrastructure policy adopted by other agencies (e.g. Gloucestershire County Council, National Highways) as these affect the new Garden Town."</p> <p>Other comments?</p> <p>"The principle (page 10) to respect existing communities states that "We must see the</p>	<p>The Charter is a high level document and does not cover details of planning policy. We are working closely with the GCC team on the route options for the offline solution to the A46 and incorporating our principles where possible.</p>

	<p>protection and enhancement of historic villages and their landscape". This is very welcome; however, on evidence seen to date, this is not being followed by the Gloucestershire County Council team in their consideration of a strategic traffic solution (page 15). Over a number of years, new bypass proposals have been looking to position a new dual carriageway bypass (to the A46) along the route of the A435. This would have significant adverse consequences for the village of Teddington (environmental, road safety and dislocation from local services). We would like to see Tewkesbury Borough Council and the Garden Town team influence bypass route proposals so that they also adhere to the Programme Charter."</p> <p>In addition, we have a couple of questions around the indicative Garden Town locations (page 8 of the charter).</p>	
<p>4</p>	<p>The reference to 'communal growing areas' I would like to see as more specific ie allotments. A communal growing area can be an orchard or anything like that . I think allotments can be very beneficial in the place agenda providing a meeting place for residents, exchanges of ideas and an introduction for young people to nature.</p> <p>The build requirements for sustainability should be more challenging. The standards mentioned will be normal legal requirements (solar panels, ground / air source heat pumps) by the time the build actually takes place. We need to look to the future at possible opportunities and at least include strategies for discussion.</p> <p>Following on from our meeting with HE I think there should be some mention of exploring alternative, sustainable energy. The wind farm model on the flood plains was something HE appeared to favour with nods as well to funding. This could be a golden opportunity to lead on innovation and also perhaps attract new green industries to the area.</p>	<p>We agree we want the Garden Community to be an exemplar and will reconsider the wording on page 13 to better allow for future innovation and best practice.</p>
<p>5</p>	<p>On page 8</p> <p>Siting the proposed industrial areas away from the B4079 at the A435 junction, and closer to the M5 and rail links, would seem far more appropriate and have benefit of helping to reduce impact on the road infrastructure in the area and the environment as a whole.</p>	<p>Thank you for your comments we are working closely with Gloucestershire County Council on the offline solution for the A46, which would re-route the traffic away from the existing A46. Enabling the aspirations which we reference in</p>

“The A46 to become a more attractive route for walking and cycling.” Given the existing and proposed development it’s difficult to see how this could be achieved without re-routing the A46 itself, not least given the volume of traffic that will ensue from the newly built houses.

The A46 is already dangerous for pedestrians and cyclists alike and the new developments will only add to the volume of traffic at all times of the day and night. This means the “Delivery of a strategic traffic solution to reduce existing congestion & support housing and economic growth” cannot be achieved without re-routing the A46.

Page 16

Just looking at the scope/ spread of the Garden Town is worrying. The potential of any ill-considered expansion of the eastern edge of the Garden Town scope will only serve to severely impact existing, and historic, village communities. As a result, there needs to be consideration on limiting the Garden Town spreading too far east to enable any rerouting of the A46 to pass between Aston Cross and the Teddington Hands roundabout, rather than at the roundabout itself. The A435 is already heavily used and it is necessary to ensure communities along this road are not directly, and very adversely, affected by any rerouting of the A46.

I know a lot of people will be responding to your Charter document, however, I wanted to pick up on just these specific items.

Please let me know if you want more, I have plenty of other comment I should like to make with regard to the protection of existing village communities to the East of the M5 and how the impact of the increased volume of traffic in the Ashchurch gully is affecting them.

6

This documents describe a set of Principles that should be applied to the series of Garden Community developments – that have replaced the previous aspiration for a Garden Town. Page 6 – Developing a New Vision. The proposed vision statement – the phrase “Making Tewkesbury the Hub which serves and supports the wider heartland” Refers to Tewkesbury as

the document. The location of the employment area has also been considered with this in mind. The Charter is a high level document and does not set a boundary for the Garden Community, this will be considered in the Local Plan process.

Thank you for your comments the wording of the vision will be re-considered. The size of the Garden Community is a reflection of the National Government programme of which Tewkesbury is

a hub, this has connotations of “commuter hub” If the outlines of this document are to be believed, the garden town vision is to permit Tewkesbury to develop in a controlled manner and NOT to provide a commuter estate for other towns and cities. Suggest the vision is amended to reflect this.

Page 8 – Garden Community Locations

Describes six communities for development. However with the exception of the Ashchurch Army Base (which will now remain) these developments cover the same footprint as the previous Garden Town Proposal. Given that the mandatory government targets for development have been rescinded, What is the justification for this footprint? If the principles described in this document are followed, community development will follow from the needs of Tewkesbury businesses development. The document provides no reference to any studies which describe plans for business development in and around Tewkesbury and the consequent need for staff – which will inform the need for housing. Without this firm foundation then you are creating a commuter town which I’m sure you don't want.

Page 9 – Development Principles

I think these are better illustrated as a spoked wheel, with the hub in the middle representing Garden Communities and each principle representing a spoke. Then underneath you can state that as a wheel if any one of the spokes (principles) fails the wheel (garden community) will collapse. If you are asking stakeholders to commit to these principles (page 19) then I am sure the community will want a strong commitments as described above. After all, the principles are not a Pick’n Mix. There are TWO principles (spokes) missing from this Page 9:

- Balanced Development and
- Travel/Transport improvements aligned with community development.

Balanced Development

Any garden community development must be aligned with the need of Tewkesbury businesses. However the document DOES NOT mention where any business developments will take place. Current reality is that there are more houses than there are jobs in Tewkesbury so it has become a commuter town. Witness the gridlock on the A46 every work day as people head for the motorway. Please amend the list of principles to include a commitment to community development reflecting local business development. [There is a single reference to “mixed use “ on page 15 – but it is not clear if this refers to business/industrial development]. Travel/Transport improvements aligned with community development. Any garden community developments must be aligned with the ACTUAL

a part, Tewkesbury has 'Garden Town' status and as such seeks to provide for development of around 10,000 homes plus employment, services and infrastructure. The housing need in Tewkesbury will be addressed in the Local Plan process. We will consider the graphical representation of the principles. We consider that 'Balanced Development' is covered under our principle 'Integrated live, work and play communities' and 'Travel/Transport Improvements is covered under 'Sustainable wider connectivity'.

Thank you for your comments, providing land for employment uses is an integral part of the Garden Community. We will strengthen the wording on page 16 to highlight the importance of Employment/Business development within the Garden Community. The Charter is a high level document as such does not deal with details of mitigation for either traffic or flood/surface water management. The issue of appropriate traffic and flood mitigation measures is dealt with though the planning process and already exists as a requirements in that process.

We will reconsider that wording on page 13 to strengthen the commitment to sustainability, without restricting innovation or future technologies. The requirement for all new dwellings to have EV charging points is already a requirement under planning policy. The Charter is High level and wouldn't cover this fine detail.

capacity of roads, rail, buses etc. It is all very well to draw a picture of a bicycle and mention “Sustainable wider connectivity” in the principles, the reality is that the A46 is gridlocked every work day and further developments – whether in line with these principles or not will only make the situation worse. The mile of A46 East of M5 J9 has 5 sets of traffic lights and 2 pedestrian crossings. Please add this is a new principle. I believe it is so important that it cannot be buried as part of “Sustainable wider connectivity” [Page 15 mentions Strategic Traffic Solution – but there is no commitment to ensure that Garden Community developments will only proceed alongside transport improvements].

Page 12 – Water Infrastructure

Fails to mention flood management – 2007 and Jan 2024 should tell you that no matter what your studies say, the fundamental is that for every cubic meter of flood plain lost, the water has to go some-place else and if the area it has to go into is smaller, then the water will get deeper. Within the areas outlined for community development there are two significant restrictions to the water escaping – the M5 and the Railway. In 2007 the railway in particular caused water to back up to the East of the railway line – exactly where some of the communities are planned.

Page 12 and the Principles (Page 9) must commit to flood control improvements in order to protect the new Garden Communities and existing Communities. These flood control improvements must be implemented before Garden Communities start being built.

Page 13 – Sustainable development

Mentions buildings should have PV electric generation I think this should be a stronger statement – Developers must commit to installing solar panels on ALL new homes AND new businesses.. Page 13 doesn't mention Electric Vehicle (EV) charging points. I believe the developers must commit to installing EV charging points for each parking space.

Page 15 – Sustainable Wider Connectivity. See comment on Page 9 - Travel/Transport improvements aligned with community development. Describes a principle for 20mph speed limits and no on street parking. I believe this principle to be unrealistic, recent developments have too few parking spaces for each house. If you aspire to no on street parking then you must ensure each house has sufficient off street parking AND is fitted with multiple EV charging points. It is down to the planning approval process to commit to ensuring that houses and businesses have sufficient parking to enable the goal of no on street parking.

Page 15 describes “Development of infrastructure in advance of large numbers of new homes”. Please expand this point to clearly describe what infrastructure you are referring to

We will remove the reference to removing parking from the streets. We will reconsider the wording on page 15 to clarify which 'infrastructure' is being described. The implementation of traffic solutions is dealt with through the planning process and is not appropriate for the Charter document to impose detailed restrictions. We will reconsider the wording on page 18 to clarify what we mean.

AND and which are excluded. Schools, Doctors Surgeries, Roads, Rail, Community Centres, Local Shops. This document is the place for TBC to clearly describe what it believes is infrastructure. That way community expectation will not be disappointed.

Page 15 describes “Strategic Traffic Solution” – there is no commitment that traffic capacity will be improved in parallel with the garden community developments. Likewise there is no commitment that if traffic improvements are delayed then garden community development will also be delayed. I’ve lived here since the mid 1980’s and despite numerous promises of a traffic solution nothing has happened. So I expect these principles to include a clear and binding commitment that development WILL NOT proceed until traffic solution is implemented. I’m also aware of how long it takes to develop and approve a traffic improvement – so I believe you will have to change the outline timescales on Page 7 to show Garden Community Development starting in 2034 or later.

Page 18 – Promoting community ownership and longer-term stewardship.
It is not clear what this means – please be clearer.



Table 3 – List of comments from various TGC governance meetings

#	Meeting	Comment	Response
1	Governance meetings	Make the colours on the map on p8 clearer to what they are meant to represent	Noted
2	Governance meetings	Add a section stating we know there are these problems (such as transport etc) so communities think we are not just ignoring them.	REWORD PAGE 4 TO INCLUDE UNDERSTANDING OF CONSTRAINTS
3	Governance meetings	The word heartland makes you think of Tewkesbury Town and should it be named interheartland.	Vision to be reconsidered as part of this engagement but without ignoring all the previous engagement that was done on it originally.
4	Governance meetings	Add more about flooding, so it does not look like it is being ignored	page 4 to mention consideration of constraints etc.
5	Governance meetings	Page 6 needs to be clearer that this is the old vision.	The text makes this clear.
6	Governance meetings	On page 10 it states that garden communities will connect and compliment the local area. Please can it be confirmed if this is an aspiration or an assumption	The Charter is an aspirational document. It can not make assumptions or requirements on development.
7	Governance meetings	The document does not show business pictures, so this focus needs to be there if we want to keep live, work, play aspect.	Live work play, includes a focus on employment and business uses, the wording will be strengthened to highlight the importance of this.
8	Governance meetings	Things such as internet speed and room to work at home needs to be considered.	This is covered on page 16

9	Governance meetings	This document needs to look at enhancing the area as well. Maybe we need to think about water and how it can be managed to enhance this development.	This is covered by our principle Interconnected water infrastructure on page 12
10	Governance meetings	Youth need to be included more	Amend text on page 16 highlight the needs of all ages and an update in the vision
11	Governance meetings	Ensure employment strategy is clear	Covered by Live work Play principle
12	Governance meetings	Need to look at how we deal with flooding in the document as this is something residents want to know about to give people confidence.	The charter is a high level document that talks about principles. The details of mitigation of issues such as flooding is not for this document but amendment to text on page 4 will highlight the understanding of constraints and challenges. Flood risk and drainage issues are already dealt with via the planning process and our existing SPD on flooding.
13	Governance meetings	The draft charter is very clear and a good point for people to get a general overview. However on the ground there are lots of planning applications coming through. People want to know how these fit in with this programme	The Charter and other work by the Garden Communities team is aimed at managing the growth in this area and working with developers to ensure their applications meet our aspirations. Clear assessment of planning applications against our principles will assist in understanding how they reflect the garden community aspirations. Unfortunately as this stage The Charter has now planning status in the decision making process.
14	Governance meetings	The A46 is a massive issue and should be mentioned	Page 4 will mention the challenges and constrains that the garden community is working with.

15	Governance meetings	The coloured blobs on page 8 makes it look like a unbuilt on area and makes it look like they will all follow garden communities principles. There has been houses in those areas which have been built and do not fit with the garden communities principles. It was confirmed that there would be a foot noted added to reflect this and conversations have been had with developers to look at retrofit.	note to be added in the forward regarding 'retrofit' where possible
16	Governance meetings	Why are there no numbers in this. It was confirmed that the SLP will confirm how many houses will be allocated if any.	For the local plan to consider not the charter. Tewkesbury has 'Garden Town' status under the national government programme and this remains around 10,000 homes, as well as employment, services and infrastructure.
17	Governance meetings	Needs more emphasis on employment	Noted and added on page 16
18	Governance meetings	There needs to be a golden thread through the document showing respect to existing communities.	This is covered under our principle 'Respect existing communities'
19	Governance meetings	Could there be a score chart of what makes a garden community house	The Garden Communities team is working on an assessment matrix, this is a separate piece of work and not an appropriate level of detail for the Charter
20	Governance meetings	Page 8 needs a key of what the colours mean.	Noted
21	Governance meetings	Use photos from this area not random photos.	Noted will amend if possible, where appropriate photos exist
22	Governance meetings	Great starting place, attractive document, is not too wordy and hits the right mark. Great place to start engagement with public.	Noted
23	Parish Council comment	Page 8 <ul style="list-style-type: none"> • Development Map cuts off Eastern side to accommodate text. • It fails to include existing development, resulting in false perception of (usable) space. • North West section crosses railway line – Does this mean the 	Employment is located to work with the location of the 'offline solution' for the A46. The masterplan includes a 'buffer' around Pamington. BNG targets are being considered as

		<p>existing bridge plans will be re-submitted? • Are the most easterly areas, south of the A46 and either side of the B4079, still intended for employment? This would be highly unsuitable as it will bring heavy traffic very close to the AONB. Industrial/ commercial parks would spoil the setting of what is one of the area's greatest attractions. • Siting industrial areas closer to the M5 and rail links would have benefits to both infrastructure and the environment. Page10 • Agree that Tewkesbury Town's role should be protected and enhanced but how will historic villages and their landscape be protected when some are already being overwhelmed by new development, for example Pamington? Page 14 • Only minimum 10% Biodiversity Net Gain targeted – disappointing in view of existing agricultural relative monoculture.</p> <p>Page15 • “The A46 to become a more attractive route for walking and cycling.” Given the existing and proposed development it’s difficult to see how this can be achieved without rerouting. • “Delivery of a strategic traffic solution to reduce existing congestion & support housing and economic growth.” Can this realistically be achieved other than by re-routing?</p> <p>Page 16 • “New Employment areas to South of A46” – not further explained. Implied within the boundaries?</p> <p>Summary - While the draft Charter contains many laudable aims it lacks enough meaningful examples of how these can be achieved</p>	<p>part of a whole 'ask' of developers and viability is a key consideration if other aspirations are to be met, such as affordable housing and sustainable building design.</p> <p>The Charter is a high level document, further work will be required for Design Guidance and Design Coding to set out details.</p>
24	GCC	See separate document within appendix 1	
25	Governance meetings	Consideration of higher BNG requirement - noted that GCC had conducted a review of Councils considering 20% BNG requirement.	

#	Responder (if known)	Comment	Response
1		<p>P11 - "one coherent community"- A little unclear whether it is one community or many....and all be geographically in one place, so not sure how each can reflect it's local context...as surely they all have the same local context?</p> <p>P13 - "smart monitoring of water us, energy use, and water generation to preserve precious resource" How?</p> <p>p14 - "Nature outside every home" - A rather strong promise, if 'compact development' is to be followed</p> <p>P15 - "Promotion of cycling across the garden communities through safe and convenient routes, away from primary roads". - Not practical or efficient to take cycle routes offline - and this conflicts with the point highlighted below...roads don't get much more Primary than the A46!</p> <p>p17 - "Efficient use of the land through the"- The 'compact' community which would seek to make efficient use of the developable area, seems to be at odds with the promise of nature and open space in front of peoples homes etc. We cannot put loads of green space IN the heart of the NDA, without compromising the 'compact' nature of the built form...by necessity it will start to sprawl.</p> <p>P- 17 - "public open space and green, people friendly streets". - This is an unrealistic promise...you cannot possibly front ALL houses onto POS.</p>	<p>Page 11, reconsider wording of distinct settlements to better reflect holistic and comprehensive approach to masterplanning.</p> <p>The charter document is high level and aspirational. The Garden Community expects and requires the highest standards of design and sustainability our principles reflect this, there are other examples around the country where 'offline' cycle routes and nature outside every home have been achieved.</p> <p>The point of page 14 explains how 'nature outside every homes' is expected to be achieved. Street trees for example are compatible with a compact and 'high density of development. Remove reference to all homes fronting POS, but POS should be accessible to everyone. This means that attractive and accessible links to green space should be provided.</p>
2		<p>Thanks for this document and we broadly welcome and support the document's overall approach and philosophy. Of course, it is not a statutory document for planning purposes and is not legally binding.</p> <p>In terms of comments, we identify the following:</p>	<p>Importance of railway station and need for improvement will be added to page 15.</p> <p>reference to cotswold stone will be removed, the Charter does not seek to consider details such as materials, that will be for further work on design guidance and design coding.</p>

	<p>Whilst 50% of open space is a laudable aim, it is possibly somewhat premature at this stage, in terms of assessing the full constraints and opportunities of the Garden Town development area and its capacity to absorb the identified number of homes overall along with all other infrastructure – schools, roads, retail, employment, open space, landscaping and natural areas. We are keen to work the Council, other land owners and partners on the overall master planning of the Garden Town.</p> <p>The key phasing and delivery of infrastructure and development will be a key issue. It would be challenging to deliver infrastructure in entirety in advance of development of homes or other uses. It is normal for development to be phased alongside infrastructure need and requirements.</p> <p>We would identify that the opportunity to enhance and utilise the main line railway station which sits within the middle of the Garden Town and existing community needs to be emphasised more, as this offers the potential for significant modal shift and sustainable trip movements, reducing the need for private vehicle trips and consequently impacts on the A46, J9 of the M5 and the immediate local highway network. As you know Network Rail have developed with Homes England early but outline proposals to provide a third platform and rail line that would facilitate potential increase in services to 4 per hour in both directions.</p> <p>There is reference to the use of Cotswold stone. We would identify that whilst a great material, the Garden Town is not within the Cotswold AONB or conservation areas with such use of natural stone is extensively seen. There are potential issues with availability, cost, labour, waste and energy efficiency of homes. We suggest that the use of this material should be for key buildings or sensitive areas and not</p>	Wording around phasing will be reconsidered
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		wholesale across the Garden Town. Whilst also modern materials and modern design should be welcomed within the Garden Town.	
3		<p>Tewkesbury Borough Council – Garden Communities Charter</p> <p>Many thanks for sharing with us the draft Garden Town Charter that the Council has prepared. We welcome and share many of the ambitions and strategic principles that are set out within the draft. We do however have some limited comments on the detailed wording which we consider would either improve the Charter or assist with its practical implementation. These are as follows:</p> <ul style="list-style-type: none"> • A preference is expressed in the section entitled 'Interconnected Water Infrastructure' for the use of permeable materials. The experience of our drainage consultant however is that open and well maintained SUDS features are a generally more effective and reliable means of mitigating flood risk during extreme events. Whilst the Charter should not therefore rule out any options for managing flood risk, provided the proposed drainage strategy for a development achieves the overarching objectives, there is no need to specify any particular form of drainage solution. • The section entitled 'Great Green Spaces for People and Wildlife' states that there should be "nature outside every home". If applied literally this would limit the variety of form and character within the residential areas and could limit the Masterplanning opportunities. It is more important in our view to focus on strategic green infrastructure and how development interacts with and supports a robust green infrastructure network which benefits the movement of people and nature. 	<p>Reference to specific drainage solutions is removed.</p> <p>Nature outside every home, could be achieved with 'Street Trees for example and this is very much achievable and an appropriate aspiration for the Garden Community.</p> <p>Your point is noted however, tackling existing congestion is also important for health and wellbeing, air quality and the encouragement of walking and cycling due to improvements in the quality of routes for those users. This does not detract from the goal of encouraging modal shift.</p>

		<ul style="list-style-type: none"> • The final bullet point of the 'Sustainable Wider Connectivity' section references "reducing existing congestion". Whilst I can appreciate that for some people the objective of reducing congestion would be a high priority, there is in some respects a conflict between this objective and the sustainability agenda. If congestion is reduced, the car will have a competitive advantage which will inevitably encourage more people to drive rather than use sustainable or active travel options. The clear focus should in our view be on supporting alternative forms of travel as opposed to increasing the appeal of the car. We recognise that such a change would not necessarily be popular with local communities but it is important in tackling the climate emergency. 	
4	North Ashchurch Consortium	<p>I am writing on behalf of the North Ashchurch Consortium (NAC), whom as you know are made up of Bellway Homes, Bromford Housing Group, and Mansfield Partners. They would like to make the following comments and suggested changes to the Council's Draft Programme Charter.</p> <p>Firstly, NAC welcome the continued commitment of the Council to the Garden Communities and fully support the Council's preparation of a Charter. The Charter will provide clarity for all parties as to the type of place that the Council expect to see delivered, and this will assist NAC as it prepares its proposals over the coming months. As you know, NAC are committed to working with the Council and other stakeholders in delivering a high quality development to the North of Ashchurch that befits its status as a Garden Community.</p> <p>Overall, NAC welcome the style and much of the content of the draft document. There are however a few points that need clarification, and</p>	<p>1 . Agree 'framework planning' is not clear, will reconsider wording.</p> <p>3. Meeting simply building regulations is not aspirational or inline with the best practice and sustainable building design which the Garden Community wishes to promote. We can re-consider the word 'carbon neutral but the strength of aspiration on this will not be weakened.</p> <p>We will reword to reference current best practice 'passivahus' or improved future standards, to allow for further developments in technology and innovation.</p> <p>4. bullet will be amended to reference 50% Green infrastructure (which includes gardens) to</p>

	<p>some wording that would benefit from review by the Council prior to its formal endorsement.</p> <p>1. Garden Communities Journey</p> <p>The phrase 'Framework planning' on the slide on page 7 would be clearer if it was amended to 'Framework masterplanning'. This would provide the clear link then with the ongoing work of NAC to prepare a framework masterplan for the northern area.</p> <p>2. Indicative Garden Communities locations</p> <p>Although page 8 is clearly labelled as 'indicative', it is suggested the areas on the plan are also labelled as 'indicative areas' for the avoidance of doubt.</p> <p>Reference is made here in the text to developers needing to respond to the principles and details in the charter. Could a further reference be added to 'developers working together to deliver key infrastructure'?</p> <p>3. Development Principles</p> <p>The Development Principles for the most part are fully supported, and reflect the type of place that NAC want to deliver.</p> <p>As the document is an aspirational document and one that all parties are intended to endorse, it is suggested that the wording 'We must see' would benefit through being more flexible, through replacing wording such as 'must' with 'aspire', 'working towards' or 'should see' to enable future applications to assess the detail at the time.</p> <p>The only principle that warrants comment and review is 'Carbon-neutral communities and building sustainably for climate resilience'. Carbon-neutral means that any carbon dioxide released into the atmosphere from the development is balanced by an equivalent amount removed. Having a carbon-neutral community from day one (or 2026 as indicated in the programme) will be challenging to deliver from</p>	<p>be consistent with our draft strategic framework plan and other Garden Communities.</p> <p>5. wording will be clarified to define 'early' and the quantum of housing triggers etc.</p> <p>6. all homes to front open space, removed and replaced with all homes to have convenient and attractive access to open space.</p>
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	<p>a commercial and practical sense. The technology to achieve net zero homes is developing, and Bellway Homes are at the forefront of this with its pioneering work testing new ideas with Salford University on 'The Future Home'. The results are awaited, however, the cost of providing the technology today needs to be balanced with the need for homes that are affordable and with delivery of wider community benefits. It is suggested that wording is updated along the line of 'development should meet the building regulations at the time of the development' this allows for flexibility during the lifetime of the development avoiding day one restrictions and future proofing the Garden Community.</p> <p>It is recognised the Garden Communities will be developed up to 2050 or beyond, and that through this period technology will evolve, costs will come down, and building standards will change to ensure the Government meet its target to reach net zero by 2050. It is therefore highly likely that through the life of the development, carbon emissions from new buildings will be reduced to support the Government's goal in line with national policy. The Government reiterated just before Christmas that Councils should not be imposing energy efficiency standards that go beyond the Government's programme for improving energy efficiency of new buildings through building regulations¹. In this context, we would suggest the principle is amended to read 'Net zero ready development and building sustainably for climate resilience' to ensure there is flexibility for future proofing to ensure development is possible at the early stage.</p> <p>Further, reference to Passivhaus design techniques being required (page 13) may have similar unintended consequences. It is suggested the sentence is amended to read: 'New homes and public buildings that reduce the need for energy, through measures such as the use of energy- efficient building materials and sustainable design techniques where appropriate to at least meet Building Regulation at that time.'</p>	
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		<p>4. Great green spaces for people and wildlife</p> <p>The requirement for a minimum of 50% allocated public green space goes beyond the general rule of thumb promoted by the Town and Country Planning Association, which instead expects to see 50% green space which includes public space and private gardens. Further, the NPPF definition of open space includes “all open space of public value, including not just land, but also areas of water which offer important opportunities for sport and recreation and can act as a visual amenity”. The implications of the wording as proposed would have a greater impact on the developable area than other developments, and therefore could have unintended consequences on delivery of homes to meet the national and local shortage of supply.</p> <p>In this context, we would suggest the wording is amended to ‘a minimum of 50% of the Garden Communities area allocated to open spaces of public value, and private gardens’.</p> <p>The requirement for a minimum of 10% Biodiversity Net gain to be delivered is also supported by NAC.</p> <p>5. Sustainable wider connectivity</p> <p>The requirement for delivery of infrastructure in advance of large numbers of new homes is acknowledged as important to the Council, but delivery will need to be phased recognising the practicalities of delivery on large sites and viability.</p> <p>In this context, we would suggest the wording is amended to ‘the delivery of infrastructure in parallel with the delivery of new homes’.</p> <p>6. Owned and rented homes, housing types and densities to supporting diverse communities</p>	
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		<p>The NAC support the aim for the Garden Community to be a beautiful and inclusive place for all to live, providing housing that meets the need for the borough. The requirement for ‘all homes to front on to public open space and green, people friendly streets’, is however considered unrealistic as it may not be possible for all homes to front onto public open space.</p> <p>In this context it is suggested that the wording is amended so that ‘All homes are to be near public open space.. ’ to make the deliverability more practicable.</p> <p>I hope these comments are helpful to the Council in taking the Charter forward. Subject to the wording of the final version, NAC would happily endorse the Charter.</p> <p>Look forward to hearing from you on a date to discuss the comments and suggested wording.</p>	
5	Redrow Homes Limited	<p>We understand this is an opportunity to provide feedback on the draft charter and not an opportunity to promote the strategic development of sites. Representations will be made to the Strategic Local Plan consultation separately in the coming weeks. Therefore, the comments below are not exhaustive and are specifically related to the context within the draft charter.</p> <p>Redrow controls c. 108 acres of future development land at Walton Cardiff located immediately to the west of the M5; please see attached masterplan for reference. The land is immediately adjacent to the boundary of the proposed garden communities as identified on page 8. Whilst our land control falls outside of the proposed garden communities boundary, we propose that land west of the M5 at Walton Cardiff be considered in the context of the proposed garden communities and the existing communities within Tewkesbury. The garden community vision emphasises supporting Tewkesbury residents,</p>	<p>We can consider the inclusion of Walton Cardiff site within our masterplanning work. The 'red line' for the Garden Community is not set and will be considered via the local plan process. The Garden Communities team do not have a fixed site boundary and would encourage all development taking place in the area to work with us and consider our principles.</p>

	<p>businesses and the wider community. Land at Walton Cardiff has the potential to play a vital role in the success and delivery of the proposed garden communities, unlocking vital sustainable transport connections between the proposed garden communities and the existing communities in Tewkesbury. The site has to ability to facilitate:</p> <p>A local green corridor along the northern boundary with Tirl Brook, that connects with the wider green corridor as identified in the proposed garden communities;</p> <p>The creation of a green corridor / open space along the existing stream to the south, with potential new development fronting onto it;</p> <p>Enhanced sustainable and active transport connections linking Tewkesbury town centre and the garden community via several PRow traversing the site on the northern part, with a Bridleway / National Trail path crossing at the centre and connecting the site to the east via a pedestrian bridge over the M5.</p> <p>The creation of vehicular access to the north and south of the site via the existing country lane. These access have the potential to: maximise connections within the wider area while limiting vehicular traffic through Walton Cardiff village, and accommodate the southern link road as identified in the garden communities draft masterplan to provide strong connections with this site and the wider garden communities development area;</p> <p>A new community of approximately 25ha with a community hub at the centre of the site.</p> <p>Redrow are generally supportive of the Garden Communities development principles. Redrow has its own set of development principles, the Redrow 8 Manual, which I have attached for reference. The Redrow 8 set of principles are focused on creating places that offer social and environmental benefits for new residents and the wider community they will become a part of. All Redrow developments are designed in accordance with these design principle in mind to ensure a</p>	
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	<p>consistent approach to high quality development. These principles compliment those proposed in the draft charter.</p> <p>Specific comments on wording within the document are as proposed: p.10 "The protection and enhancement of historic rights of way and improved access to the countryside beyond garden communities p.10 "Sustainable travel routes from the garden communities to the heart of the town centre." p.14 "a network of greenways and quiet lanes to preserve rural character and give access to green spaces" - whilst connecting existing communities (via Walton Cardiff) p.15 "most journeys can be via walking, cycling, bus and train." – Consider alternative methods of sustainable transport and active travel. p.15 further focus of multi modal transport. Suggestion of mobility hubs to ensure a range of options for active and sustainable transport methods. - Walton Cardiff can play a key role in the delivery of active transport links from the Garden Communities to Tewkesbury Town centre and the existing wider communities.</p>	
6	<p>Firstly, in principle we believe that the Charter should represent a commitment that Tewkesbury Borough Council and Gloucestershire County Council enter in to, to demonstrate their commitment to the principles of the Garden Communities, and to provide a clear statement of intent that they can return to over the considerable time that it is likely will be required for the Garden Communities to be delivered. Landowners, ownerships and developers can and will change over time and so it seems almost certain that parties will become involved over time who have not and will not sign the Charter. To carry weight, the Charter needs to be a stand-alone commitment by the responsible authorities – ie Tewkesbury Borough Council and Gloucestershire County Council. In summary, the principles set out in the Charter are helpful and set out the broad range of issues that the Garden Communities should aspire to deliver. The individual bullet points which</p>	<p>Noted. The area of the Garden Community is not yet fixed and this is for the local plan to consider. The Garden communities team encourage all development in the wider area to work with us and consider our principles. This is not limited to Northway and Ashchurch. The wording around 'linked garden communities' will be amended to clarify Tewkesbury's official status as a Garden Town and to ensure comprehensive and holistic Masterplanning is a requirement.</p> <p>Noted, regarding clarity of introductory paragraphs and will be considered.</p>

	<p>provide some more detail of how each of the principles should be delivered also seem sensible. However, we have the following broad comments to make regarding the way the Charter has been set out:</p> <ul style="list-style-type: none"> • The Charter misses an opportunity to clearly set out that the concept is for a series of linked Garden Communities. The idea is threaded through but should be a key message set out up front. • The introduction is reads as rather “process heavy” and does not inspire a reader to understand the opportunities represented by the Garden Communities and the potential for the creation of exciting and positive places. The Charter is an opportunity to set out how the Garden Communities will be innovative, inspiring and exciting. The Introduction and initial sections should be used to sell this fantastic concept which will ensure Tewkesbury’s future and create new places truly integrated with nature, landscape and the surrounding countryside communities, rather than focus on references to ad hoc development and the process of developing the concepts. The introductory paragraphs to each Principle are sometimes confusing and do not clearly capture the main elements of each principle. We would suggest looking at the way these have been written to ensure that they set out the essence of each principle and link back to the initial paragraphs setting out the overarching vision for the Garden Communities. We are also concerned that this could be a Charter for anywhere. With the exception of the comments about water infrastructure (which does pick up on some unique elements of Tewkesbury including the River Severn, main watercourses and the fact that management of water is a key aspect of the local area), these principles and statements could equally apply to any garden town project. If the concept grows from local distinctiveness, what is that local distinctiveness and how does it then flow through the principles. <p>Detailed Comments:</p> <ul style="list-style-type: none"> • Pg 1. The title page refers to “A series of linked communities in North Gloucestershire”. We would suggest that this terminology is too vague, and that it would be better, and more locally distinctive, to refer to 	<p>Page 13 wording on carbon neutral will be reconsidered for clarity as per previous comments from others.</p> <p>50% GI wording to be amended as per previous comments from others, to include garden spaces or just public space. This is consistent with the Draft Strategic Framework Plan.</p> <p>Page 15 – noted and will amend as appropriate</p> <p>Page 17 noted – however Tewkesburys housing need is considered on a borough wide basis, the exact requirements of this is a matter for planning policy.</p> <p>The charter is a high level document at this stage does not include a viability assessment, that will be for further work though the Local Plan.</p>
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	<p>Northway and Ashchurch in some way to fix the location of the Garden Communities to this area.</p> <ul style="list-style-type: none">• The Charter should set out in the introduction who is the expected audience for the document. Is it intended to set out principles for Communities and Parish Councils to understand, for Councillors, or for developers and landowners – or all of these stakeholders?• Pg 11 - A strong identity and character of place. This section essentially begins to set out a design code. The principles need to strike a clear balance to ensure continuity across all phases of the Garden Communities whilst not stifling innovation and creativity, which will in turn create distinctiveness. The challenge is to encourage distinctiveness in the design of each part within a recognisable high level design framework• P13 - Carbon-neutral communities and building sustainably for climate resilience. 'Carbon Neutral' needs clarifying - does this refer to homes/construction or does this extend to the wider development. Future Homes standard isn't Zero Carbon, so messaging needs to be consistent. Standards should require Zero Carbon, with no fossil fuels used. Passive Haus may not be viable and has the prospect to introduce standards/testing and costs that just cannot be achieved, compromising delivery of homes. In addition there should be a recognition that the limit to the actual deliverability of Zero Carbon will be the availability of electricity – do we need a commitment to pursue the Utilities at an early stage to ensure they can put in place infrastructure to deliver zero carbon development <p>P14 - Great green spaces for people and wildlife. The bullet point refers to 50% of the Garden Communities area being open space requirement? We question whether this is deliverable –what work has been done to test the viability of this requirement or whether it can be delivered alongside the quantum of new homes that are required. Biodiversity Net Gain may be achieved across the site without the need to identify that amount of open space.</p>	
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		<ul style="list-style-type: none"> • P15 - Sustainable wider connectivity. To state that ‘Most journeys will avoid car travel’ is unrealistic and at this stage unevidenced, and risks setting false expectations of what can realistically be achieved. The statement should read ‘the development will promote and encourage alternatives to car use, through the delivery of cycle, bus and pedestrian routes across communities’ • P17 - Owned and rented homes, housing types and densities to supporting diverse communities. Affordable homes should be to meet the needs of Tewkesbury town not the wider region, and it would be helpful to indicate proportions of the affordable housing that are expected to be delivered by the Garden Communities. Reference to ‘compact’ communities, but to ‘efficient use of land appropriate to its setting which will vary across each of the communities’. Homes for later living should be provided ‘where needed’ <p>More generally, we would note that the Charter sets out principles each of which contain many requirements that the Garden Communities must deliver – some of which are discussed above. We are concerned that these requirements are being set out in a Charter which will at the very least raise expectations and may be used in the future as a list of requirements which must be delivered. What thought has been given to funding requirements and sources? If the requirements are all to be provided through development, what evidence work has been undertaken to look at viability and whether the expectations are realistic</p>	
	<p>Tewkesbury Borough Council – Local Planning Authority (LPA)</p>	<p>LOCAL PLANNING AUTHORITY DRAFT GARDEN TOWN CHARTER COMMENTS</p>	<p>Noted and agree</p>

		<p>Thank you for inviting comments from the Local Planning Authority on the draft Garden Communities Charter. I am aware that the promotion of a Garden Town at Ashchurch has been a corporate priority for the Borough Council since the award of Garden Town status in 2019, this followed the area's identification as a broad location with merit for consideration for long term development in the Joint Core Strategy in 2017. It's also clear that this location is relatively unconstrained by any significant planning designations such as National Landscape and Green Belt, does not lie within the highest zones of flood risk and has the potential to be served by an enhanced passenger rail link.</p> <p>I am also aware that much preliminary work has already been carried out, including the preparation of a concept plan and engagement with various site promoters/land-owners as well as with Homes England and other Government departments and infrastructure providers. The Planning service has had some involvement in this where appropriate.</p> <p>I understand the draft Charter marks a re-set for the programme, with a renewed emphasis on public and stakeholder engagement in shaping how the scheme will progress.</p> <p>The context is that north Gloucestershire will undoubtedly continue to be an attractive and successful location for people to live and work. Strong housing, economic and other commercial growth are therefore to be realistically expected, and the Borough Council and its partners</p>	
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	<p>and communities must be prepared to maximise the opportunities arising from growth over the next 20 or 30 years and beyond.</p> <p>Quite understandably, at this stage the draft Charter represents a high-level set of aspirations which would determine the manner in which a Garden Town – or linked series of garden communities – would be delivered.</p> <p>Nonetheless, it helpfully addresses some fundamental principles. Quite rightly, it looks to take the initiative in proposing that new development should be co-ordinated, rather than ad hoc, and identifies the opportunity for comprehensive garden communities to be an important part of the mix of the future growth of the Borough. It further usefully recognises that a coherent vision is needed aimed at delivering high standards of development whilst addresses climate change and securing nature recovery. The aspirations for interconnected and accessible carbon neutral communities, with a strong identity and character, with strategic blue and green infrastructure are also to be welcomed.</p> <p>As part of the approach, the draft Charter also identifies that early provision of health, education, transport, digital and other social and public infrastructure should be made; and that some form of community stewardship should be enabled. In my opinion these are critical considerations.</p> <p>Importantly, there is also welcome recognition that any such new communities should complement and connect with historic Tewkesbury Town, as well as other existing settlements in the area.</p> <p>The LPA perspective</p>	
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	<p>As the statutory planning system is central to delivering sustainable development, Tewkesbury Borough Council's planning department will also naturally be instrumental in ensuring the delivery of any garden communities in the Borough, both in terms of framing evidenced planning policies and making decisions on individual proposals.</p> <p>The overall aspirations in the draft Charter are consistent with the economic, social and environmental sustainable development priorities enshrined in the National Planning Policy Framework (NPPF). I am mindful that the introductory paragraph to the NPPF was amended in December 2023 to emphasise the priority role of local plans in planning for sufficient housing and other development in a sustainable manner; and I note that this principle is acknowledged in the draft Charter.</p> <p>The publication of the draft Charter is timely as the Authority has recently commenced formal public consultation on 'issues and options' the Strategic and Local Plan (SLP) (jointly with Cheltenham and Gloucester councils). The express aim of the SLP is to provide for sustainable development across the wider sub-region, with a draft vision and strategic objectives comparable to those set out in the draft Charter.</p> <p>At this formative (Regulation 18) stage, no specific locations for development are yet being proposed. Instead, alongside seeking views on what overall numerical development requirements should be adopted over the next 20 years or so, we have identified various spatial</p>	
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	<p>scenarios through which the future housing and other development needs of the area might be met.</p> <p>One such option is the development of strategic scale new settlements, with the Tewkesbury Garden Town being expressly acknowledged as a candidate. Whilst other very different development scenarios are also presented (such as urban concentration and rural dispersal), I am mindful that the NPPF highlights that the supply of large numbers of new homes can often best be achieved through planning for new settlements or significant extensions to villages and towns. That is on the proviso they are well located and designed, and supported by the necessary infrastructure and facilities, including a choice of transport. The importance of working with the support of communities is also highlighted as a priority.</p> <p>The implementation of the Garden Communities would inevitably be a long-term prospect extending beyond the timeframe of the SLP. Helpfully, the NPPF acknowledges that this may sometimes be the case, and that the associated infrastructure requirements may not be capable of being identified fully at the outset.</p> <p>Nonetheless, even with that in mind, it appears to me that particular issues that would need to be addressed for Tewkesbury would be green infrastructure, water management, strategic and local highway access including J9(M5), affordable and other forms of housing, school and other social infrastructure such GPs, modal shift including maximising the potential of Ashchurch rail station, landscape, design, sustainable construction and energy efficiency, mix and type of of uses, its relationship with Tewkesbury Town and ongoing community</p>	
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	<p>stewardship. The viability of the overall concept will also be key given the very large scale of the scheme.</p> <p>Given the scale of necessary technical work, I can see great merit in our teams co-operating on these matters, (as indeed the LPA expects to engage constructively with promoters of other large sites, albeit those sites are of a lesser scale).</p> <p>I would therefore welcome your active engagement in the Regulation 18 consultation which runs from 16th January to 12 March 2024. The SLP website and related consultation platform can be accessed here: strategiclocalplan.org</p> <p>I note the recognition at the outset of the Charter itself to the status of the document. The Charter may be capable of being a material planning consideration albeit of limited weight. To this end, the language of the Charter should take care to ensure it does not give the impression of representing planning policy in its own right; this could include words like 'must' or setting what could be implied as policy targets ahead of the emergence of the new Strategic and Local Plan which would be the appropriate forum through which such standards be expressed having been evidenced and tested independently at examination. Similarly, the implication of the Charter being signed up to by stakeholders, developers, land promoters (and or their agents) will not in and of itself represent a significant material planning consideration.</p>	
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	<p>It would be instructive to understand what the intended next steps for the Charter might be and how these relate to the planning policy framework; this may extend beyond any potential allocation in the emerging Strategic and Local Plan, in terms of more detailed policy or guidance. In circumstances where there is a reasonable prospect of applications being considered ahead of the adoption of the Plan (and any formal allocation being made), this could take the form of strategic framework masterplans or more detailed area specific masterplans which could be adopted as Council policy and be capable of being material planning considerations. Beyond the formal adoption of the SLP and any allocation being made this could be through a Supplementary Planning Document and or design guidance as set out in a Local Design Guide / Code.</p> <p>Planning applications may come forward within the area delineated by the Charter as Garden Communities, these applications will need to be determined in accordance with the Development (Local Plan) unless material considerations indicate otherwise.</p>	
	<p>1-We applauds the Development Principles (p9) but feel they are based on ideology rather than practicality. Given how developers have behaved in the past, we have little faith that promises will be kept. We wonder who will be willing to take on community ownership and longer-term stewardship in areas with no previous community to draw upon.</p> <p>2. Who will protect trees, hedgerows and paths? Enforcement of planning laws is difficult at the best of times. We would look for a firm commitment from TBC to pursue breaches and ensure effective reparation is made when necessary.</p> <p>3. 'Streets designed for people not cars'(P11) – is all very well, but people have cars and those streets need to connect to the highway system. How do TBC propose to achieve this? It is unlikely that garden</p>	<p>1 – The charter is a high level document based on our principles, further practical delivery details are for further work and the planning process to consider.</p> <p>2- Noted</p> <p>3 - 'Streets designed for people not cars' prioritises the accessibility for people and active travel methods such as cycling but still maintains access for private vehicles. Further work on 'Design Coding' will be necessary to establish details.</p>

	<p>communities will provide sufficient employment for residents, or that all residents will wish to work within their community. There needs to be a realistic calculation as to how many residents will travel for work. Current bus and train services are unreliable and insufficient. Can TBC really influence changes to these? Recent developments in Bishop's Cleeve have met the agreed requirements for car parking spaces but are plagued by additional residents' cars parking on roads and pavements. Not all behaviour can be influenced by planning.</p> <p>4. We has concerns about the effectiveness of flood prevention. Water courses within communities need to be safe and well-managed. How does TBC propose funding and implementing the necessary maintenance given its current track record on preventing Tewkesbury flooding? Will the proposed 50% of public green spaces actually be flood plain in reality? This would hardly be conducive to the physical and mental well-being of residents.</p> <p>5. We have concerns regarding 'Use of data and local information to support active and sustainable travel' (P15). Beware of desk-top data! For example, accident data showing no pedestrian accidents is of little value if the area currently does not have any pedestrians.</p> <p>6. Whilst we wholly supports the principles of well-designed, high-quality homes which are also characterful and beautiful – we question whether these can also be affordable? In summary, the Draft Charter sets out high aims and principles for the planning and development of garden communities. However, without detailed information on how these aims and principles are to be achieved, it represents a pipe dream. There is a need for far more 'meat on the bones' to evaluate the worth of the Charter</p>	<p>4 – Technicle details of flood mitigation and surface water management will be delt with via the planning process. Some of the green space will be flood plain for not all.</p> <p>5 – Noted</p> <p>6 – The charter is a high level document and we agree that further work is needed on design guidance and design coding to establish the details.</p>
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Appendix 1

Gloucestershire County Council charter response

To: Tewkesbury Borough Council

Economy, Environment and Infrastructure

Our Ref: TGC/RN

Your Ref:

Date: 29th January 2024

Dear Sir/Madam

Gloucestershire County Council Response to Garden Communities Draft Charter Consultation January 2024

Thank you for consulting Gloucestershire County Council (GCC) on the Garden Communities Draft Charter. I have the following GCC officer comments to make. It is acknowledged that some of the comments are quite detailed at this early stage, but they are intended to help inform policies and design as the Garden Communities scheme progresses.

GCC is forming a project team of officers from a range of disciplines who will input into further consultations and will be happy to provide advice as and when requested by Tewkesbury Borough Council (TBC) officers.

Highways Development Management

We are pleased to see that the development principles include references to providing sustainable wider connections, which should include both employment, retail, access to schools and other facilities. One of the key challenges of the garden community is its integration with the wider community and the delivery of high quality, sustainable transport links to these.

Integrated live, work and play communities can help to reduce reliance on the private vehicle and a large degree of internalisation of this development will be key in ensuring it delivers on its sustainable transport credentials. The key to this will be master planning, considering mechanisms such as land equalisation agreements to ensure 'joined up' delivery and understanding the relationships between the various land uses on the site. Further to this is understanding the timescale for delivery of the various aspects of the development. Employment/retail land uses and community infrastructure such as schools should be delivered at the same time as the housing to ensure that this integrated community can be achieved from an early stage.

The document states that "travel routes from the garden communities to the town centre" must be seen, and we would like the wording of this strengthened to put more of an emphasis on active travel.

The document makes reference to a "clear strategy of how to link the town centre". There are several barriers to this development caused by segregation of largescale infrastructure. For example, the A46 provides a significant barrier to north-south movements which will need resolving. The railway line provides significant challenges to east-west movements, and whilst there is a proposed bridge over rail for the northern parcels of

land, there has been little consideration of the southern parcels. The current infrastructure south of the A46 is lacking for east-west movements and this will be a real challenge in permeability both within the Garden Community but also with wider links to Ashchurch/Tewkesbury.

We welcome the reference to streets being designed for people not cars, and this can be a useful tool in reducing car ownership/private vehicle trips. Further details on how this is likely to be achieved would be welcome.

We are pleased to see reference made to walkable neighbourhoods, and echo comments above in respect of the timing of the delivery of these neighbourhood areas as this will be key in ensuring private vehicle trips are reduced from the outset of the development. The design of these is crucial, but so is the supporting infrastructure such as ensuring adequate well designed cycle storage is provided, as well as other tools such as comprehensive robust travel plans.

We are generally supportive of the measures suggested within the “sustainable wider connectivity” section of the document. However, the detail which ensures this will be achieved will be one of the key challenges.

20mph speeds for streets is a welcome aspiration, but it will need to be supported by a range of measures to ensure it can be delivered, through engineering/design works. Removal of car parking from streets can be achieved through either design or measures such as on-street restrictions (double yellow lines, etc). The issue of car parking is a key one for the Garden Community. There is a balance to be struck between providing enough car parking across the development to ensure overspill parking does not occur on the highway, as well as design considerations of having parking located in prominent locations at the front of development. This will be tied closely to any design codes for the development.

It would be useful if the use of data and local information to support active travel could be expanded on, as it’s not clear what the aim of this is. Initial discussions in respect of the site have focussed on a bespoke assessment which moves away from relying on historical travel patterns and trends, reflective of the aspirations of this being a very sustainable community.

The delivery of infrastructure prior to the delivery of large numbers of new homes is key (as discussed in detail above). A strategy for securing this infrastructure will need to be determined at an early stage – will the delivery of this be left for the developer to build or is the plan for

infrastructure to be delivered through S106 agreements? What is the strategy in place should piecemeal development come forward ahead of site-wide proposals?

The site is well located to the Ashchurch for Tewkesbury railway station, and it is vital that good quality, sustainable links are provided to this. It lends itself well to some form of sustainable travel hub with onward connections for the bus routes, etc. It will require input from Train Operating Companies/Network Rail to ensure that adequate capacity is available and that the relevant upgraded service provisions are provided. From experience, this is not a quick process but forms a critical transport aspect for the proposals. An uplift in rail services calling at Ashchurch for Tewkesbury at an early stage to help establish sustainable travel options and avoid reliance on the private car would be welcomed.

Transport – Junction 9/M5 – Atkins Comments

General

The Tewkesbury Garden Town (TGT) concept masterplan that was produced in 2021 has altered and now focuses on garden communities covering six potential areas, to be developed by different developers, with developers having to respond to the garden community principles and charter. There is now no mention of approx. 10,000 houses and approx. 120 ha of employment land and suggests a phased approach to development. This is potentially concerning if the Department for Transport (DfT) and National Highways (NH) are consulted, as it does not specify approx. quantum of development or development type - only potential locations or any real commitment to the amount of development that would give M5 J9 a robust strategic needs case that is required going to Outline Business Case (OBC) stage.

It doesn't give the M5 J9 scheme the necessary policy hook and status at a local level that we think is necessary to remove constraints on growth in this area and to enable the future development proposals. The charter also appears to be focused for developers, giving them the engine to bring forward the six communities at different times without necessarily requiring an M5 J9 offline scheme.

While the concept of a Charter including development principles seems a good one, it is not evident how performance in relation to the principles is intended to be assessed by TBC, and what the implications would be if key parties (e.g. developers) either do not sign up to the Charter or later bring forward development plans that are not fully aligned with the Charter.

Forward Page Para 2 - If a series of linked garden communities are being delivered in preference to a phased garden town, does this mean that different policies and local plan requirements will apply to each community? i.e. some significant developments around the existing communities and on the north side of A46 will be delivered in line with existing planning policies and legal requirements and not the principles defined in the Charter, or any enhanced policy requirements which will become part of the emerging Cheltenham, Gloucester, Tewkesbury Strategic Local Plan (CGTSLP). Will the Charter have any material weight during the planning application process? Is the wording too open so that achieving the Charter could be argued/achieved through very limited action or provision of physical infrastructure above what is legally required as a minimum?

Indicative Garden Communities Locations para 8 - The extent of the Indicative Garden

Communities does not include large potentially developable areas on the west side of the M5 shown in the Housing and Economic Land Availability Assessment (HELAA) published with the CGTSLP Regulation 18(1) consultation, areas are shown around the A38 and Walton Cardiff (circa 3,000 houses?). Why aren't these areas included as part of the Garden Community programme? Including these areas would align with the Reg 18(1) and some of the principles identified in the Charter e.g. connections to Tewkesbury, etc.

Page 6 - It mentions the communities journey (programme) and these key milestones:

- 2023-2026 Framework planning - planning exactly what is happening - by how and by whom it will be developed;
- Development will begin between 2026-2035; and
- 2035-2050 Completion depending on the scale of the new communities.

How does this align with M5 J9 scheme planned for RIS 4 2030 - 2035? By the end of 2026 we should have more idea of location and quantum of development? (The CGTSLP should be adopted by 2026).

Principles page 10 - 'Travel routes from the garden communities to the heart of the town centre/ a clear strategy of how to link the town centre with new areas' - it is not clear what is meant by this, i.e. new walking/cycling routes, public transport or new roads? We agree that connectivity between new developments and town centre is important but suggest the wording is made more specific. Presume this should refer to sustainable travel, as increased car-based journeys between developments east of the M5 and Tewkesbury town centre will put pressure on an already congested road network.

Principles Page 15 - The aspiration that 'most journeys can be via walking, cycling, bus and train' is laudable but probably not realistic - even in very optimistic planning scenarios regarding sustainable travel mode share, it is expected that outside of core urban areas most journeys will continue to be made by private car. Increasing adoption of electric vehicles over the next 10-15 years is forecast to reduce the cost of car travel in real terms which will encourage greater car use unless measures are adopted to either restrict car use or apply some form of additional charging to car users.

The focus on walking, cycling and public transport is rightly highlighted, but to address the above paragraph consideration is also required as to whether additional measures to restrict car usage would be expected as part of the Garden Communities development and/or what would be expected in terms of improvements to the highway network to cater for the additional car journeys resulting from development.

Following on from the above point, it is recommended that further thought is given to the wording of the final bullet on this page 'the delivery of a strategic traffic solution to reduce existing congestion and support housing and economic growth.' This implies that there is a single solution but does not state what it is (presumably the M5 J9 scheme?). While the M5 J9 scheme is expected to play a key role in unlocking development (particularly to the south of the A46), it is also likely that other interventions will be required at M5 J9 and along the A46 in the short term to unlock and mitigate the impacts of early phases of development. Upgrades to key routes on the local road network including Northway Lane, Shannon Way and the B4079 are also likely to play a key role in facilitating Garden Community development, even with the focus on sustainable travel.

Principles Page 15 - None of the bullets on this page specifically refer to bus travel. A clear strategy for this mode will be needed if the Garden Communities are to be served by effective public transport that will provide an attractive alternative to travel by private car for journeys which cannot easily be made by walking or cycling.

Principles page 15 - 'Delivery of infrastructure in advance of large numbers of new homes...The A46 to become a more attractive route for walking and cycling..... The delivery of a strategic traffic solution to reduce existing congestion and support housing and economic growth' - could indicate the need for improvements to A46 but no mention of M5 J9 which is the connection to the Strategic Road Network. Also, principles are focused on walking and cycling and sustainable modes of transport, can M5 J9 be specifically mentioned given its strategic importance on the SRN?

Principles Page 16 – We suggest further thought is required regarding employment /workspace provision. Reference is made to 'new employment areas south of the A46', but it is not evident how this would align with housing developments north of the A46 and support sustainable travel principles - particularly if the new employment areas are located in the far south of the Garden Communities area. There could be greater encouragement for ensuring provision of suitable employment opportunities within each of the Garden Communities, rather than concentrating this in one area. Also repurposing of existing employment land in the Northway area - i.e. replacing warehousing / logistics with higher value office and technology based developments close to the heart of the Garden Communities and within walking distance of the rail station.

Principles pages 11,13,15 - Improvements to the existing road network will be needed to connect the new communities to shared facilities and employments areas, there is likely to continue to be a significant demand for private car journeys within, and between the communities. Do principles need to be defined in the Charter for how this will work, including parking facilities, etc. For example, how will increased use of the rail station be achieved?

Public Rights of Way (PROW)

There are some very important principles included in this document that we would want to see taken forward particularly considering a recent planning appeal suggestion that the crossing of the railway at Teddington be closed to enable the development to the immediate west of the railway line. The National Planning Policy Framework (NPPF) specifically requires priority to active travel and the closure of this at grade crossing without mitigation; (i.e. a new bridge) would be contrary to all the plans and proposals set forth in this document. For example, pages 54, 70, 73 where the need for better connections over the railway line is specified. We would want to see the retention of the crossing point on the railway at RL7 to Hone Downs Farm crossing to be retained as part of the PROW network and active travel network.

PROW are a strategic part of the active travel network and must be protected and improved during development to facilitate the links needed by people who will be residents and working on the sites.

Transport Planning

We think it would help to be clear about what is required regarding distances and land use to make the garden town / community genuinely sustainable from a transport perspective. Key metrics should be built in from the start.

Page 9 development principles – helpful to have a clear statement that people’s daily needs should be within easy walking and cycling distance and on facilities that people of all ages and abilities will feel comfortable using.

Page 10 last bullet – should include a reference for the need to link new settlements to the town centre by sustainable modes of transport i.e. bus /bike.

Page 11 last bullet which is repeated from previous page – same comment as above.

Page 13 - good to see reference to compact communities, but there will be a potential tension with the need to do this to promote sustainable transport and the landscape/water led approach. Metrics will be needed to assess transport accessibility and ensure the distances to daily services and facilities are genuinely accessible on foot and by bike.

Page 13 – needs to be clearer what needs to be within walking distance to really be ‘walkable’. ATE’s recent guidance provides the following advice;

‘NPPF paragraph 105 also prescribes that 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. 2.8 In this regard, a mix of local amenities should be provided within an 800m walking distance of all residential properties or staff entrances for workplace facilities, while a bus stop with regular service(s) should be located within 400m. Local amenities may include but not be limited to a food shop, park or green space, indoor meeting space, primary school, post office or bank and GP surgery. All developments that include new dwellings should demonstrate how local schools, colleges and higher education institutions will be accessed by active travel modes.’

It is important that this approach is built into this early vision and subsequent masterplanning, policies and design guidance for the Garden Communities to ensure there is a genuine option to walk, cycle and use public transport.

Page 14 - need to ensure that the approach to landscape doesn't result in communities that are not well connected by sustainable modes and where the distances to access daily services and facilities and public transport are too far to encourage most people to use these modes of transport.

Page 15 – 5th bullet - cyclists will also need segregated facilities on primary roads where this would be the most direct link or where there are properties/destinations to access of the primary link.

Page 15 – a network of transport hubs should be provided which are in easy reach (400m to 800m) of all housing, retail, employment and education and provide facilities for interchange, access to public transport, strategic cycle networks and access to transport information as well as the opportunities to build in facilities for hire or micro P&R where appropriate.

Page 15 – suggest that parking should be 'designed in' to streets rather than 'removed'. On street (shared) parking when well designed, landscaped and coded can help prevent later problems with ad hoc and pavement parking and also improve open space provision and densities of dwellings.

Next steps should include masterplanning (which would need to consider M5 J9 / A46 role and ideally should probably inform/influence those), design coding and the development of delivery phasing and funding plans.

Public Health (PH)

Recognising this as a high level, aspirational document, which acknowledges its role as table-setting within the planning system, PH are fully supportive of the process to reengage communities, partners and all stakeholders in shaping the vision, plan and objectives for the area.

In responding to the Charter, and with specific reflection on public health, we'd seek a greater narrative of embedding health and addressing health inequalities, into all the stated *development principles*, and for any future plan-making in the area.

Health Impact Assessments (HIAs) for the area should underpin any design principles for future master planning. Understanding the health inequalities for the area will go a considerable way to proactively addressing the differences in experience of the environment rather than just designing specifically for each group.

Additional areas of interest to PH at this stage would be:

Adapting to an ageing population – What’s clear from the most recent Chief Medical Officer’s report [Chief Medical Officer’s Annual Report 2023 – Health in an Ageing Society: Executive summary and recommendations \(publishing.service.gov.uk\)](#) is that a large proportion of people migrate away from cities before they reach older age. The result is that urban areas largely maintain their current demographic, ageing only slowly, but, importantly for Gloucestershire, rural and semi-rural areas will age much faster.

Older people often spend a higher proportion of their time in homes than at other times in life and communities and the housing developments and neighbourhoods within are key to supporting an ageing society.

Homes for older people need to be located in places where they can easily and safely reach the everyday shops and services that they need, preferably by active transport (walking or cycling) to help maintain their physical health.

We welcome the aspiration for both open space and blue/green infrastructure and are keen to see any design meet the needs of all users including older people and those with sensory and physical impairments. The Charter’s ambition is for generous, accessible, and good quality green and blue infrastructure which we welcome as a catalyst for promotion of health, wellbeing, and quality of life. We’d add that the inclusion of cool spaces is paramount and has the potential to be achieved somewhat organically, with the intention to ensure access to woodland and blue space from residential settlements. Primary prevention as part of the built environment and wider adaptations can have a major impact in reducing temperature-related risks to health for both heat and cold.

With regard to the respecting local community’s principle, it’s never too early to ensure that planners recognise the impact of the development of existing neighbouring communities, residents and businesses both in construction and operation and to ensure that their health and mental wellbeing is understood and supported.

Social value in design and development –reference to SV plan and partnership with designers/developers even at this early stage would be beneficial.

We've no doubt that the plan makers are across the OHID spatial planning and HIA guidance and resource, as well as Sport England's Active Design framework which sets out how the design of our environments can help people to lead more physically active and healthy lives, but for completeness:

[Spatial Planning for Health: an evidence resource for planning and designing healthier places \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/collections/spatial-planning-for-health)

[Active Design | Sport England](https://www.sportengland.gov.uk/active-design)

Public Health are aiming to deliver Healthy Places workshops in 2024 for county and district colleagues and will be in touch in due course.

Ecology

We would like to see the Charter refer to Building with Nature Accreditation, which GCC's planning team already asks for in the planning policy for minerals, which sees that developers of sites think of the impact on nature, but also climate change, water management, climate resilience and carbon (and for housing communities, inclusivity and accessibility) – far more than just 'with nature'.

On top of having the principles of the Charter translate into local planning policies and SPGs, **Building with Nature, BwN accreditation**, also pulls together multidiscipline teams, and critically raises the priority of addressing the SUDs and water management, biodiversity, active travel etc. up the agenda when designing the scheme at outline stage. The BwN design award would best suit outline stage. This leads to better wins for people and nature and provides the focus of achieving each of the standards for the scheme.

The aspiration for open space provision of 50% is a good place to start from in terms of green and blue infrastructure, active travel and wildlife corridors, to ensure that open space provision is not squeezed from outline to reserved matters. Will avenues, verges and pocket parks be classed

as open space? There may be merit in a mix of densities for placemaking. We would encourage some use of avenues across main routes to ensure trees in the urban environment.

Public spaces around the Currant and Tirlle Brooks along with natural habitats, wildlife corridors, and other green/blue links connected to the railway corridor would ensure full connectivity. This would also let nature be connected with public breathing spaces like community orchards and pocket parks with pollinator flowers (native wildflowers and nectar rich ornamentals). A successful design would manage to link in these features to community hubs, to allow the most benefit to the local community, and that these places are cared for and get the maximum benefit.

We would like to see mention of natural play, trim trails, etc. and even bridges over some overland water as part of the SuDS. These offer wellbeing benefits and connecting with nature for children and even adults if they have a green gym element.

We would also encourage that the design comes from a study of the existing site, topography for the best places for the SuDS features, retains and uses the existing hedgerows, etc. using the principles of Biodiversity Net Gain (BNG). The design should allow for softer edges, such as wider and taller hedgerows, and bramble edges to encourage the community to relate to the space (e.g. blackberry picking) to promote 'ownership' and connections to the natural seasons.

A suggested edit would be "The protection **and enhancement** of existing trees, hedges and walking paths", as well as including some simple examples would be clearer and provide what good design looked like (although it contains some excellent photos, this needs to translate to the design and plans).

This Charter could refer to some of the best industry standards on BNG, Green and Blue infrastructure and SuDS.

This is an opportunity to promote breathing space in nature to a part of Tewkesbury where it is needed to balance the industrial areas. Incorporating BwN from the outset would ensure that the multidisciplinary teams who will bring this forward to planning achieve the vision of the Charter.

The project team/designers will need to provide the BwN accredited agent with the evidence (signposting/ referencing the relevant plans and paragraphs in the planning documentation – and often the same evidence is used to meet multiple standards so little additional work is required). Full BwN award for constructed schemes is also an option, however the design award is the key one to have in place. BwN is appropriate and proportional/reasonable in terms of cost, for the social and economic benefits it can ensure it brings to a new community.

Flood Risk Management

The Lead Local Flood Authority (LLFA) appreciate the principle described as

‘interconnected water infrastructure’ and believe that in conjunction with the ‘great green spaces’ principle, the LLFA will be able to direct developers to providing high quality SuDS with primarily above ground water conveyance. The requirement for 50% of garden communities being allocated to public green space should be extremely helpful in achieving good SuDS provision. The LLFA are keen to continue dialogue with the relevant TBC team(s) to discuss this further.

Strategic Planning

This is a very aspirational document, but it is not a document with any weight in planning terms, as it’s not currently linked to any planning policy, as per the disclaimer. We would like to see, set out within this document, the process/work programme and timetable to turn this aspiration into planning policy and Supplementary Planning Guidance alongside and parallel to the emerging Local Plan. This will increase its material weight.

The site will be a critical part of the housing delivery. There is nothing in this document, about delivery and how it will be managed, specifically around achieving infrastructure in the right place at the right time and avoiding a ‘first come, first served’ approach to existing capacity within community facilities. We would like to see a development principle on delivery and a one-page statement about delivery and how they expect to achieve it in an equitable way for all developers, e.g. one masterplan, equalisation agreements in place, etc. in a similar way to the other development principles. How will the emerging local community be supported as the development is built out (i.e. school availability, delivery of community facilities, etc).

The document would also benefit from a clear statement of how stakeholders will be engaged in the future and at what stage (stakeholder management plan). We would specifically like to know how GCC will be involved on infrastructure provision and other matters that we are

responsible for. A statement on stakeholder identification and engagement within the development principles and in the document would be useful. We would also note that 'connectivity' applies to people and not just places and transport.

There are some very aspirational terms in this document. At some point these need to be defined e.g. beautiful, characterful, major public space, passiv haus design techniques, human scale, live/work units, etc. We think this document could do more to be clear about how, where and when these terms will be more clearly defined in future i.e. through policy and Supplementary Guidance, perhaps as part of a 'delivery' statement?

The document doesn't specifically state that green and blue (water) infrastructure should be designed together. It's implied but not stated. It should be written into the development principles. This is critical to on-site flood management as the green and blue infrastructure are closely linked. SuD design also needs to be included in this as an important development principle.

'Respect local communities and reflect local character' and 'a strong identity and character of place' are a bit mixed up as development principles. There needs to be clarity about what is local community character (people) and what is design character (place).

Development Principles – carbon neutrality & building sustainably from construction to use. The development principle suggests that the development will look to make the whole development carbon neutral from construction to use. The Homes and Buildings standard, passiv haus techniques, etc. are tools that apply to securing energy efficiency in the functioning of buildings, but the development aspiration goes further than that and suggests that carbon emissions from the production and transportation of construction materials will be considered. Is this the intention and how will it be secured?

Many homes are now built with only one source of heating, so future resilience will need to be considered. Most systems such as solar panels and heat pumps need to connect to electricity networks. Energy producers will need to be involved in discussions about sufficient energy to supply these homes. Also, future building cooling requirements are likely to require energy also. Urban cooling from greening around buildings and building design will be a key design consideration.

There are no statements about how this development may need to support infrastructure more widely such as improvements to M5 J9, water and energy provision, etc.

The provision of 50% green space is welcome, but may have design implications for the rest of the site, which will be higher density. This is efficient for public transport and local services, but may be problematic for local built form and character.

BNG will apply to any community, highways and waste management infrastructure required as a result of this development. GCC would like to discuss how to 'future proof' its future infrastructure delivery from any costs/land requirements for BNG that result from the development.

Will a broadband speed be specified in policy or in SPG?

Air Quality

From an air quality perspective, it would be beneficial to see air quality integrated into any development - from construction to the lifetime of the development. Seeing the below features at the consultation stage /requesting via condition would be ideal, but we believe this may sit with the district Environmental Health Officers/Air Quality Officers.

- EV charging infrastructure - ideally one that goes above the Building Regulations approved documents on EV charging in line with GCC/district EV charging plans;
- Construction Environmental Management Plans;
- Travel Plan/Low Emission Travel to promote sustainable and active travel. As well as accessible public transport links and walking/cycle paths, car clubs and restricted parking or similar could also be viable options to discourage private car ownership;
- Exploration of s.106 funding towards air quality matters (monitors largely);
- Importance of placement of development in regard to future occupiers and air quality exposure. Although Tewkesbury had its Air Quality Management Area (AQMA) revoked, placing development near to roads (A46/M5) may expose future occupiers to poor air quality.

From a climate perspective, we welcome the reference to Passivhaus design in the document and support this and other carbon reduction energy measures such as solar panels and air source heat pumps. Again, evidencing this at the planning stage and exploring if this could be secured via condition would be welcomed.

Minerals and Waste Planning Authority

We have reviewed the documents and just want to take this opportunity to highlight a few points which are relevant to any development in the garden communities. Under 'Carbonneutral communities and building sustainably for climate resilience' this would be supported by:

- Core Policy WCS2 – Waste Reduction of the adopted Gloucestershire Waste Core Strategy 2012;
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- Policy SR01 - Maximising the use of secondary and recycled aggregates of the Minerals Local Plan for Gloucestershire adopted 2020; and
- Supplementary Planning Document Waste Minimisation in Development Projects.

We would anticipate that any development coming forward would be assessed as to whether there might be mineral resources (likely to be sand and gravel) present on the site – see adopted Minerals Local Plan Policy MS01. If present a Minerals Resource Assessment should be undertaken to prevent the needless sterilisation of any minerals resources that might be present on the site through either prior extraction or incorporation into the development.

GCC officers look forward to working with TBC and other stakeholders on this scheme over the coming months and years. It is probably worth arranging a meeting to discuss the matters raised above once you've had time to consider them. I look forward to hearing from you in due course.

Yours faithfully



Rob Niblett

Senior Planning Officer