



CHELTHENHAM BOROUGH COUNCIL

APPENDIX 2

Planning Policy Manager
Deputy Chief Executive's Unit,
Tewkesbury Borough Council,
Gloucester Road,
Tewkesbury,
GL20 5TT

ask for: Philip Stephenson
ddi: 01242 774379
email: Philip.stephenson@cheltenham.gov.uk
date: 25th March 2015

Dear Miss Jones,

Tewkesbury Borough Plan, Draft Policies and Site Options

Thank you for consulting Cheltenham Borough Council on the Tewkesbury Borough Plan, Draft Policies and Site Options, which is being conducted in accordance with regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The approach set out within the document is generally supported, including a focus on options for the delivery of the scale and distribution of new housing set out in Gloucester Cheltenham and Tewkesbury Joint Core Strategy (policies SP1 and SP2) insofar as they relate to the need for development in Tewkesbury Borough outside strategic allocations.

The following letter makes comments on the some aspects of the draft policies which we feel could benefit from clarification or where we have a view on options. The comments provided were agreed by the Cabinet of Cheltenham Borough on 14 April 2015.

Section A Housing (pg.17,18)

Introduction

We support and recognise the value of consulting on a range of rural site options informed by the Joint Core Strategy (JCS) settlement hierarchy. To retain consistency with the JCS, if future evidence indicated changes to the hierarchy, we would also wish to see these reflected during review of the JCS so as to ensure no conflict in policies between the two plans.

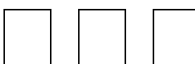
HOU1 Reasoned Justification (pg.20)

We are unsure why the number of homes to be built elsewhere in Tewkesbury Borough between 2011 and 2031, including at the strategic allocation at Ashchurch (8,377) differs slightly from the (8,565) figure in the submission JCS pg.31 Policy SP2. Can an explanation be given in future text?

Mike Redman - Director

Environmental and Regulatory Services

CHELTHENHAM BOROUGH COUNCIL • P.O. BOX 12 • MUNICIPAL OFFICES • PROMENADE • CHELTHENHAM • GLOS GL50 1PP
TELEPHONE 01242 264328 • FACSIMILE 01242 227323 • DX 7406 CHELTHENHAM 1
• www.cheltenham.gov.uk e-mail: builtenvironment@cheltenham.gov.uk



Section C The Green Belt (pg.29)

The section 'Policy Framework' contains the following wording: "Until further work is undertaken to progress site allocations, it is not known whether consideration will need to be given to further removal of land from the Green Belt."

We disagree with this wording because it indicates undue uncertainty as to the future status of Green Belt in Tewkesbury - this was not intended by the JCS. The JCS establishes a revised Green Belt boundary together with revision post 2031 identified via safeguarding (JCS policy SD6).

Explanation text 4.6.9 pg. 64 of the submission JCS states "The new boundaries identified on the Green Belt map have also taken into account longer-term need by identifying safeguarded land which may be required beyond this plan period to ensure that the Green Belt does not need an early review."

Despite this we can see that small adjustments to the Green Belt boundary may be needed through district plans to allow, for example, villages to grow to accommodate local need. However the future text on this should ensure that the green belt, in line with the National Planning Policy Framework, is given great importance and that any changes envisioned would be at very local level. Were this to be the case the JCS greenbelt methodology should be foremost in the Borough plan making process, as well as any other evidence relevant to the importance of the Green Belt in each location. If strategic changes were contemplated this should be taken through the JCS review process.

Gloucestershire Airport (pg.29)

Whilst we do not disagree with the content of these modifications we feel that the changes should be incorporated into the JCS proposals map at main modifications stage prior to adoption, and not remain within the Tewkesbury Borough Plan. This is because there is a danger that if this were not the case the two plans would be in conflict when the JCS is adopted.

Policy TRAC5 (pg.36)

We fully support this policy in ensuring contributions from development towards the provision of sustainable transport measures which will help to ensure better links into and out of the Borough.

Policy TRAC11 (pg.39)

We fully support this policy, however feel, for clarity it should mention that the railway in question is commonly called the route of the "Honeybourne Line"

Section J Flooding and Drainage Policy EVT1 Condons Sanitaires Odour Protection (pg.66)

Whilst we support this policy it would seem to unnecessarily duplicate JCS Policy SD6 (7,i) which is not referred to in the text. We think it would be a more joined up approach to incorporate these odour protection areas into the JCS at main modifications stage if possible, as then there would not be the need to cross refer to both plans and would avoid the danger of any policy conflict.

Mike Redman - Director

Environmental and Regulatory Services

CHELTENHAM BOROUGH COUNCIL • P.O. BOX 12 • MUNICIPAL OFFICES • PROMENADE • CHELTENHAM • GLOS GL50 1PP
TELEPHONE 01242 264328 • FACSIMILE 01242 227323 • DX 7406 CHELTENHAM 1
• www.cheltenham.gov.uk e-mail: builtenvironment@cheltenham.gov.uk

Policy ENV3 (Pg.70)

Since National Planning Policy Framework now allows the designation of “local green space” (paragraph 76) Cheltenham Borough Council has been working with Gloucestershire Rural Community Council to gather the views of the Borough’s Parishes and Neighbourhood and Community Groups as to which areas of green land meet this criteria.

Through the Cheltenham Plan Issues and Options consultation scheduled for June this year we will invite further responses on the submitted sites and invite views on a range of policy options for using this information for making future designations.

We have published their report here:

http://www.cheltenham.gov.uk/info/1004/planning_policy/378/evidence_base/4

The report identifies 29 areas which communities feel are worth further investigation for the designation. Within these they have suggested some areas which lie across the boundary in Tewkesbury Borough.

Whilst we have communicated about this study with Tewkesbury officers and members over the past few months, we understand that Tewkesbury Borough did not wish to undertake the work at the same time on the other side of the boundary.

In order to help to achieve a joined up approach to the provision of local green space across the area, especially relating to JCS strategic allocations as set out in JCS policy SA1 (5), we would encourage Tewkesbury Borough to undertake a similar study.

This would then help ensure that local green space provision is consistent with planning for sustainable development and that emerging designations have positive links with one another within the Green Infrastructure Network.

Yours sincerely,

Philip Stephenson,
Planning Policy Team Leader