



# CHELTENHAM BOROUGH COUNCIL

Planning Policy Manager  
Tewkesbury Borough Council,  
Gloucester Road,  
Tewkesbury,  
GL20 5TT

ask for: Hannah Millman  
dd  
number: 01242 264225  
email: hannah.millman@cheltenham.gov.uk  
date: 7th December 2018

Dear Mr Barker,

## **Tewkesbury Borough Plan Preferred Options Consultation**

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

The approach taken in the document is generally supported; with the proposed policies generally in conformity with the adopted Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) which was adopted in 2017. It is noted that the Tewkesbury Borough Plan is being prepared in line with the revised National Planning Policy Framework as published in July 2018.

The following in this letter makes comments on some of the aspects of the draft policies which we feel could benefit from greater clarification or where the view of the Council differs from what is being proposed. The comments provided were agreed by the Cabinet of Cheltenham Borough Council on 4<sup>th</sup> December 2018.

### **Shurdington**

#### **Policy RES1: Housing Site Allocations**

Whilst policy RES1 is generally supported, the Council wishes to clarify whether any transport assessments undertaken specifically regarding sites proposed in Shurdington have taken into consideration committed development within the JCS and Cheltenham Plan. For example, significant development at Brockworth and Leckhampton will impact to some degree on the A46 which runs through Shurdington.

#### **Policy RES12: Affordable Housing**

Consideration should be given to increasing the affordable housing requirement on all sites proposed to be allocated at Shurdington. These sites will have wider impact than the immediate area of Shurdington, including parts of Cheltenham which should be accounted for. The relationship and impact of any changes proposed at Shurdington to Cheltenham Borough should be recognised.

### **Community Infrastructure Levy**

Local Community Infrastructure Levy funds allocated to be spent in the Shurdington area should take account of demands on infrastructure beyond the settlement of Shurdington and into Cheltenham Borough.

### **Policy GRB1: Green Belt Review**

It is difficult to understand from the proposals maps where Green Belt designation is to be removed, and what impact this would have on the wider context of the Green Belt. It is recognised that 23.4 ha is not an inconsiderable amount of land, a better understanding of where this is proposed is required before the Council can comment further.

### **Policy GRB 2 Gloucestershire Airport and Policy EMP1 Staverton/Gloucestershire Business Parks (Staverton)**

The approach to the areas identified by these policies, enabling the development of land for employment uses are supported. However, given the operational challenges to the use of the north/south runway due to the prevailing wind direction, advanced consideration is underway to close this section. This opens up additional opportunities to expand the designations as shown. Attached is a plan which identifies those areas (shown in red) as currently identified within policies GRB2 and EMP1, and those areas (shown in blue) that we suggest are included for allocation within the Pre Submission version of the Tewkesbury Borough Local Plan.

On reviewing the mapping of GRB 2 against the mapping as attached, there are potentially some cartographic discrepancies. We request that we work with you in the redrafting of this Plan for the purposes of Pre Submission stage to ensure mapping is agreed.

### **Policy LAN5: Local Green Space**

It is noted that Tewkesbury Borough Council are deferring designation of Local Green Space to Neighbourhood Plans, as permitted in the National Planning Policy Framework. However, we wish to ensure consistency in approach on any cross boundary sites, between the Cheltenham Plan and the Tewkesbury Borough Plan. Wording would be welcomed which recognises Local Green Space designations on the sites at North West Cheltenham and West Cheltenham and supports continued cooperation between the two authorities on any cross boundary Local Green Space designations.



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### **Omission**

Cheltenham Borough Council is currently undertaking a review with its waste and refuse partner UBICO; the requirements for modern depot facilities which could also include a waste transfer station. What is clear is that the capacity of the existing depot site is challenged, taking account of existing uses and the demands arising from the expansion of Cheltenham as planned for through the JCS. Discussions are underway to assess where the best strategic location could be to position a new depot provision.

The Gloucestershire Waste Core Strategy recognises the demands arising by projected population growth and Core Policy WCS6 provides for the provision of residual waste recovery facilities.

Due to the tightly drawn administrative boundary of Cheltenham future options are likely to include sites within Tewkesbury Borough, within Zone C as defined by the Gloucestershire Waste Core Policy WCS6, potentially on sites in a green belt location. Whilst no specific site is currently identified, work will be undertaken over the coming months and we wish to record our willingness to work with you to feed into the Pre Submission of the Tewkesbury Borough Plan to identify a suitable site.

Yours Sincerely

Hannah Millman