

Response Form for the Preferred Options Tewkesbury Borough Plan

The Tewkesbury Borough Plan (TBP) is a plan for the area that will allocate sites for housing and employment development as well as provide planning policies to guide future development in the Borough. It provides a plan covering the period from 2011-2031. The Preferred Options TBP is the next step in process of creating the final version of plan.

The Preferred Options is the next draft of the plan that builds on the previous stages of the process; further refining site allocation and policy options into a version of the plan that the Council believes will promote sustainable development in Borough.

We are seeking your views on the policies and the proposals in the draft plan and would encourage you to respond by using the online consultation facility at: www.tewkesbury.gov.uk/boroughplan

However, you may also send completed forms to us via email and post:

- Email: localplanconsultation@tewkesbury.gov.uk
- Post: Local Plan Consultation, Tewkesbury Borough Council, Gloucester Road, Tewkesbury, GL20 5TT

The consultation opened on 10th October 2018 and you will be able to submit comments up to 5pm on Friday 30th November 2018.

Please complete a separate box for each policy/site option or section that you wish to comment upon.
(Additional forms can be printed from the website above).

Your details

Title: Mr
Name: John Mills
Company: Cotswolds Conservation Board
Email Address: john.mills@cotswoldsaonb.org.uk
Address: Cotswolds Discovery Centre, The Old Prison, Fosse Way, Northleach, Gloucestershire GL54 3JH

If you are acting on behalf of a client, please supply the following details:

Client Name:
Client Organisation:

Keeping you updated

Would you like to be notified of future progress on the Tewkesbury Borough Plan? (* we will do this via email)	
YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>

YOUR COMMENTS

This consultation seeks your views on the policies and sites that are presented in the Preferred Options plan.

We want to know whether you support or object to what is being proposed and, importantly, your reasons why.

Furthermore, is there anything you think that should be covered by policies in the TBP that are not currently included in the TBP (bearing in mind that the JCS also provides policies for the Tewkesbury area).

Please state the section or policy of the plan that you wish to make a comment on. This will help us understand easily which areas of the plan people have a view on.

Please state which policy, site option or section you are commenting upon? Policy: RES1 (Housing Site Allocations) Site Options: Winchcombe A & B			
Please state whether you are (please tick as appropriate)	Objecting ✓	Supporting	Comment

The Cotswolds Conservation Board's comments are grouped under the following headings:

- A. Reasons for Objecting
- B. Recommendations
- C. Supporting Information

A. REASONS FOR OBJECTING

The Cotswolds Conservation Board ('the Board') objects to the proposed site options in Winchcombe (both A & B) for the following reasons:

1. **Lack of evidence that the allocations are based on needs arising within the Cotswolds Area of Outstanding Natural Beauty (AONB):** Tewkesbury Borough Council ('the Council') has not adequately justified the need for these allocations to be located within the Cotswolds AONB. In particular, it has not identified the (affordable) housing need arising specifically within: (i) Winchcombe or (ii) the Tewkesbury Borough section of the Cotswolds AONB.
2. **Lack of consideration of 'major development':** The Council has not identified if the Winchcombe allocations, both individually and collectively, would constitute 'major development' in the context of paragraph 172 and Footnote 55 of the National Planning Policy Framework (NPPF). In particular, the Council has not explicitly identified whether or not these allocations *could* (i.e. have the potential to) have a significant adverse impact on the purpose of AONB designation¹.

B. RECOMMENDATIONS

Lack of Evidence: The Council should undertake – and make publically available - an assessment of the housing needs arising specifically within Winchcombe and the Tewkesbury Borough section of the Cotswolds AONB, particularly with regards to affordable housing, taking into account the housing that has already been completed since 2011 and the existing housing commitments. This assessment should utilise the Council's Homeseeker Plus data, focussing on existing residents of Winchcombe and the Tewkesbury Borough section of the Cotswolds AONB who are in the 'Emergency', 'Gold' and 'Silver' bands of Homeseeker Plus.

If the assessment identifies that these needs are already met by existing commitments, the sites should not be allocated. If the Council decides to retain these proposed allocations, it should provide robust justification for any housing provision over and above that required to meet the need arising in Winchcombe and the Tewkesbury Borough section of the AONB, which is not already met by existing commitments.

¹ The purpose of AONB designation is to conserve and enhance the natural beauty of the AONB.

In addition, the Tewkesbury Borough Plan ('the Plan') should explicitly state² that:

- housing development proposals in the Cotswolds AONB will need to convincingly demonstrate that the proposal would give rise to benefits to the specific settlement, particularly in relation to the provision of affordable housing; and
- windfall sites on undeveloped land adjoining built up areas in the Cotswolds AONB will be particularly closely scrutinised and will only be supported where there is convincing evidence of a specific local housing need such as needs identified through a neighbourhood plan or affordable housing needs specific to a particular settlement.

Lack of consideration of 'major development': The Council should undertake – and make publically available an assessment of whether or not the Winchcombe allocations, both individually and collectively, would constitute 'major development' in the context of paragraph 172 and Footnote 55 of the NPPF. This assessment should explicitly identify whether or not these allocations *could* (i.e. have the potential to) have a significant adverse impact on the purpose of AONB designation. The assessment should address the full context of 'natural beauty' - including the special qualities of the Cotswolds AONB, tranquillity, natural heritage (including biodiversity) and cultural heritage (including the historic environment) - not just landscape and visual impact³. It should also address the three major development 'tests' specified in paragraph 172 of the NPPF. If the allocations *do* constitute major development, these sites should not be allocated unless the Council can demonstrate that exceptional circumstances apply *and* that the allocations would be in the public interest. The nation-wide drive to build more homes should not be considered to be an exceptional circumstance, as this situation reflects the national 'norm', not the 'exception'.

Additional Recommendations: If (after the Council has implemented the above recommendations) the Winchcombe allocations are retained in the Plan, all of the mitigation measures that are currently proposed for these sites in the Plan should also be retained. If planning permission is subsequently granted for development on these allocated sites, these mitigation measures should be incorporated into planning conditions and should be robustly enforced.

C. SUPPORTING INFORMATION

Lack of evidence of need

² As per the adopted West Oxfordshire Local Plan.

³ Further information on 'natural beauty' is provided in the Cotswolds AONB Management Plan 2018-2023, particularly in Appendix 2.

Paragraph 11 and Footnote 6 of the NPPF make it clear that the general requirement for local planning authorities to meet objectively assessed needs (OAN) for housing does not apply in AONBs⁴. In addition, paragraph 172 of the NPPF specifies that the scale and extent of development within AONBs should be limited.

With this in mind, Policy CE12 (paragraph 1) of the Cotswolds AONB Management Plan 2018-2023 states that:

- *Development in the Cotswolds AONB should be based on robust evidence of local need arising from within the AONB.*

The Council does not appear to have specifically assessed the housing need arising from within Winchcombe and the Tewkesbury part of the Cotswolds AONB. It is therefore not possible to compare the proposed allocation of housing in the AONB with the need arising from within the AONB and, from that, to assess the extent to which the AONB is accommodating housing needs arising from outside the AONB. As such, the Tewkesbury Borough Plan ('the Plan') is not consistent with the policies of the Cotswolds AONB Management Plan

Policy SD7 (Cotswolds AONB) of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (which the Tewkesbury Borough Plan has to comply with) states that:

- *Proposals [for development in or within the setting of the Cotswolds AONB] will be required to be consistent with the policies set out in the Cotswolds AONB Management Plan.*

Therefore, as the Plan is not consistent with the Cotswolds AONB Management Plan, it is also not consistent with the Joint Core Strategy. On this basis, the Plan would be unsound.

Lack of evidence of the need arising from within the AONB (including the needs of individual settlements within the AONB) was one of the key reasons for all of the proposed housing allocations in the Rural Service Centres of Burford and Charlbury (and the neighbouring villages) being removed from the West Oxfordshire Local Plan, which was adopted on 27th September 2018. The Planning Inspector's report for the West Oxfordshire Local Plan stated that:

- *There is little case for the plan to provide for more [dwellings] than the already completed / committed 774 dwellings in the Burford–Charlbury sub-area (either the site allocations or a reliance on future windfalls) simply to ensure that the district-wide housing needs are met. Moreover, in the*

⁴ For example, paragraph 172 of the NPPF, which relates to AONBs, clearly meets the criteria set out in paragraph 11(b)(i), which specifies the circumstances in which the requirement to meet objectively assessed needs does not apply.

absence of a specific housing need figure for the sub-area, it is not possible to identify that new dwellings, over and above existing completions and commitments, are as a matter of principle, necessary specifically in the context of the AONB or the Burford–Charlbury sub-area’ ... ‘the allocation in the plan of housing sites, and the reliance on additional windfall housing development, in the Burford – Charlbury area, over and above existing completions and commitments, would not be sound’.

The Burford / Charlbury situation is comparable, in many ways, to the situation in Winchcombe. For example, they are rural service centres which have (or had) proposed housing allocations in the Cotswolds AONB but where no evidence has been presented of the need arising with the communities themselves or within the relevant section of the AONB. In this context, there is a significant risk that the Plan could be found unsound if it does not provide: (i) evidence of the need for new housing arising from within Winchcombe and the Tewkesbury Borough section of the AONB; and (ii) robust justification for any housing allocation provision over and above that required to meet the need identified in (i), which is not already met by existing commitments.

Although the Joint Core Strategy has identified the overall housing need within Tewkesbury Borough and the hierarchy of villages which should accommodate this housing, it is the Tewkesbury Borough Plan which identifies the specific allocations for accommodating these needs. As such, it is within the Council’s power to identify alternative locations, outside the Cotswolds AONB, for the allocations that are currently proposed for Winchcombe. When considering alternative locations outside the AONB, the Council should, if necessary, also consider locations outside of the Borough. This consideration would reflect paragraph 26 of the NPPF, which specifies that:

- *Joint working [between local planning authorities] should help to determine...whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.*

The adopted West Oxfordshire Local Plan, referred to above, sets additional criteria relating to housing developments in the Cotswolds AONB, including:

- for any housing development that is considered in the Burford-Charlbury sub-area, ‘it will need to be convincingly demonstrated that a scheme would give rise to benefits to the specific settlement or the sub-area’ (paragraph 9.6.29);
- ‘within the Cotswolds AONB, windfall housing proposals on undeveloped land adjoining built up areas will be particularly closely scrutinised and will only be supported where there is convincing evidence of a specific local housing need such as needs identified through a neighbourhood plan or affordable

housing needs specific to a particular settlement, for example through a rural exception site'
(paragraph 5.39).

These criteria would also be appropriate for the Tewkesbury Borough Plan.

Lack of consideration of 'major development'

Paragraph 172 of the NPPF states that '*planning permission should be refused for major development [in an AONB] other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest*'. Although consideration of planning permission is part of the 'decision-taking' process, the issue of major development should still be considered at the 'plan-making' stage, rather than left until the decision-taking stage. This is because if a site that is allocated in a local plan is subsequently considered to be major development, it should not be permitted⁵ and the site would be undeliverable. A local plan which allocates such undeliverable sites would be unsound. Making an assessment, at the plan-making stage, of whether an allocation constitutes major development would help to resolve this issue. This approach to the major development issue reflects the legal opinions provided to the South Downs National Park Authority by Toby Fisher⁶ and, separately, by James Maurici QC⁷, both of Landmark Chambers. It is worth noting that Mr Fisher's legal opinion concluded that :

- *It would arguably amount to an error of law to fail to consider paragraph 116⁸ at the site allocations stage of plan making for the National Park.*

Factors that might lead to the conclusion that the allocations *could* have a significant adverse impact on the purpose of AONB designation – and, therefore, constitute major development – include the:

- scale of the proposed allocations - 120 homes;
- setting of the proposed allocations – in the highly sensitive landscape of Landscape Character Type 1B (Escarpment Outliers – Langley Hill)⁹;
- adverse effects upon views from the Gloucestershire, Wychavon and Winchcombe Way descending towards the town from Langley Hill.

Even if the allocations are retained in the Plan after the issue of major development has been considered at the plan-making stage, the issue of major development should still be a consideration at the planning

⁵ Unless exceptional circumstances applied and the development was shown to be in the public interest.

⁶ <https://www.southdowns.gov.uk/wp-content/uploads/2018/04/Core-11-Major-Development-Advice-2017.pdf>

⁷ <https://www.southdowns.gov.uk/wp-content/uploads/2015/01/Guidelines-on-Significance-for-SDNP-Planning-Applications---Supplementary-Advice-October-2014.pdf>

⁸ The paragraph 116 referred to here is now paragraph 172 in the NPPF published in July 2018.

⁹ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/07/lct-1-escarpment-outliers-2016.pdf>

permission / decision-taking stage of the planning process as well. This is because the planning application stage provides a significant level of detail (e.g. design, layout, etc.) that is not available at the plan-making stage and which could still significantly influence whether or not the development would constitute major development.

YOUR COMMENTS

This consultation seeks your views on the policies and sites that are presented in the Preferred Options plan.

We want to know whether you support or object to what is being proposed and, importantly, your reasons why.

Furthermore, is there anything you think that should be covered by policies in the TBP that are not currently included in the TBP (bearing in mind that the JCS also provides policies for the Tewkesbury area).

Please state the section or policy of the plan that you wish to make a comment on. This will help us understand easily which areas of the plan people have a view on.

Please state which policy, site option or section you are commenting upon? Policy: RES1 (Housing Site Allocations) Site Options: Toddington A & B			
Please state whether you are (please tick as appropriate)	Objecting ✓	Supporting	Comment

The Cotswolds Conservation Board's comments are grouped under the following headings:

- A. Reasons for Objecting
- B. Recommendations
- C. Supporting Information

A. REASONS FOR OBJECTING

SITE A (Land at B4077): Site A has already been granted planning permission and is already being developed. On that basis, there is no reason to include it in the Tewkesbury Borough Plan ('the Plan').

SITE B (Land Adjacent to the Pheasant House): The evidence base for Site B (particularly, the Landscape and Visual Sensitivity Study) does not give sufficient consideration to the potential adverse effects that this allocation might have on the setting of the Cotswolds AONB. As such, the Plan does not comply with the:

- legal duty to have regard to the purpose of AONB designation;
- requirement of paragraph 172 of the National Planning Policy Framework (NPPF) to give '*great weight ... to conserving and enhancing landscape and scenic beauty*' of the Cotswolds AONB;
- policies of the Cotswolds AONB Management Plan 2018-2023;
- policies of the Cheltenham, Gloucester and Tewkesbury Joint Core Strategy.

B. RECOMMENDATIONS

SITE A (Land at B4077): Site A should be removed from the Plan.

SITE B (Land Adjacent to the Pheasant House): Tewkesbury Borough Council ('the Council') should undertake a more comprehensive Landscape and Visual Sensitivity Study to assess the potential effects of the allocation on the setting of the Cotswolds AONB. This study should take account of the Board's Landscape Strategy and Guidelines. It should also take into account the fact that approximately two-thirds of the site extends southwards beyond the southern boundary of Site A. If this study indicates that there could still be significant adverse effects on the setting of the AONB, the site should not be allocated.

Consideration should also be given to:

- only allowing the Site B allocation to extend as far south as the current southern boundary of Site A;
- ensuring that the southern boundary of Site A is not extended further southwards.

C. SUPPORTING INFORMATION

Site B (Land Adjacent to the Pheasant House): A previous planning application for housing on this site was rejected on appeal (in 2015), partly on the grounds of the adverse effect that the development would have on the setting of the Cotswolds AONB. The Cotswolds Conservation Board ('the Board') acknowledges that development on Site B is likely to have a less significant effect on the setting of the AONB than it would have done prior to Site A being developed. However, the Board is of the opinion that the evidence base for the Plan underplays the potential adverse effect that development at Site B could still have on the setting of the AONB. For example, approximately two-thirds of Site B extends further south than the southern boundary of Site A. Therefore, even with Site A being developed, there are still likely to be views from the Cotswold escarpment where the backdrop to Site B is an agricultural landscape with escarpment outliers in the distance. Developing new housing within these views could still have a significant adverse impact on the setting of the AONB.

The Council's Landscape and Visual Sensitivity Study give little consideration to the elevated views of the allocated site from the Cotswold escarpment, which were a key consideration in the 2015 planning appeal. The study also makes no reference to the Board's Landscape Strategy and Guidelines for the relevant Landscape Character Types (LCTs) – LCT1 (Escarpment Outliers), LCT 2 (Escarpment) and LCT 9 (Unwooded Vale). The allocation could potentially conflict with the Landscape Strategy and Guidelines, particularly if it is deemed to:

- intrude negatively into the landscape and cannot be successfully mitigated;
- adversely affect the wider rural landscape and views to and from the AONB.

Policy CE1 (paragraph 1) of the Cotswolds AONB Management Plan 2018-2023 states that

- *Proposals that are likely to impact on, or create change in, the landscape of the Cotswolds AONB, should have regard to, be compatible with and reinforces the landscape character of the location, as described by the Cotswolds Conservation Board's Landscape Strategy and Guidelines.*

Therefore, an allocation that is not consistent with the Board's Landscape Strategy and Guidelines would also not be consistent with the Cotswolds AONB Management Plan.

Policy CE1 (paragraphs 2) of the Management Plan adds that:

- *Proposals that are likely to impact on, or create change in, the landscape of the Cotswolds AONB, should have regard to the scenic quality of the location and its setting and ensure that views – including those into and out of the AONB – and visual amenity are conserved and enhanced.*

Based on the available evidence base, the proposed allocation does not comply with this policy.

Policy SD7 (Cotswolds AONB) of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (which the Tewkesbury Borough Plan has to comply with) states that:

- *Proposals [for development in or within the setting of the Cotswolds AONB] will be required to be consistent with the policies set out in the Cotswolds AONB Management Plan.*

As such, the evidence base for the proposed allocation also fails to comply with the policies of the Joint Core Strategy.

YOUR COMMENTS

This consultation seeks your views on the policies and sites that are presented in the Preferred Options plan.

We want to know whether you support or object to what is being proposed and, importantly, your reasons why.

Furthermore, is there anything you think that should be covered by policies in the TBP that are not currently included in the TBP (bearing in mind that the JCS also provides policies for the Tewkesbury area).

Please state the section or policy of the plan that you wish to make a comment on. This will help us understand easily which areas of the plan people have a view on.

Please state which policy, site option or section you are commenting upon? Policy: RES1 (Housing Site Allocations) Site Options: Shurdington – A, B and D			
Please state whether you are (please tick as appropriate)	Objecting ✓	Supporting	Comment

The Cotswolds Conservation Board's comments are grouped under the following headings:

- D. Reasons for Objecting
- E. Recommendations
- F. Supporting Information

A. REASONS FOR OBJECTING

The evidence base for the Shurdington site options (particularly, the Landscape and Visual Sensitivity Study) does not give sufficient consideration to the potential adverse effects that these allocations might have on the setting of the Cotswolds AONB. As such, the Tewkesbury Borough Plan ('the Plan') does not comply with the:

- legal duty to have regard to the purpose of AONB designation;
- requirement of paragraph 172 of the National Planning Policy Framework (NPPF) to give '*great weight ... to conserving and enhancing landscape and scenic beauty*' of the Cotswolds AONB;
- policies of the Cotswolds AONB Management Plan 2018-2023;
- policies of the Cheltenham, Gloucester and Tewkesbury Joint Core Strategy.

B. RECOMMENDATIONS

Tewkesbury Borough Council ('the Council') should undertake a more comprehensive Landscape and Visual Sensitivity Study to assess the potential effects of the proposed allocations on the setting of the Cotswolds AONB. This study should take account of the Board's Landscape Strategy and Guidelines. If this study indicates that there could be significant adverse effects on the setting of the AONB, the sites should not be allocated.

C. SUPPORTING INFORMATION

The evidence base for the Plan does not sufficiently address potential adverse effect that the proposed site allocations could still have on the setting of the AONB.

Two of the proposed allocations at Shurdington (Sites A and D) are directly adjacent to the Cotswolds AONB (just across the A46), with Site B also in close proximity to the AONB. Sites A and D are particularly significant as, combined (160 houses), they would increase the number of houses at Shurdington by 21%, compared to the 2011 baseline and existing commitments. The allocated sites are clearly visible from the Cotswold escarpment, including popular viewpoints such as Crickley Hill. However, the main focus of the Council's

evidence base is on the impact of these allocations on Green Belt. Very little consideration has been given (in relation to these specific allocations) to the potential adverse effects of the proposed allocations on the Cotswolds AONB and its setting, including views into and out of the AONB. The Council's Landscape and Visual Sensitivity Study is particularly poor in this regard.

The Landscape and Visual Sensitivity Study makes no reference to the Board's Landscape Strategy and Guidelines for the relevant Landscape Character Types (LCTs) – LCT2 (Escarpment) and LCT18 (Settled Unwooded Vale). The allocation could potentially conflict with the Landscape Strategy and Guidelines, particularly if it is deemed to:

- intrude negatively into the landscape and cannot be successfully mitigated;
- adversely affect the wider rural landscape and views to and from the AONB.

Policy CE1 (paragraph 1) of the Cotswolds AONB Management Plan 2018-2023 states that

- *Proposals that are likely to impact on, or create change in, the landscape of the Cotswolds AONB, should have regard to, be compatible with and reinforces the landscape character of the location, as described by the Cotswolds Conservation Board's Landscape Strategy and Guidelines.*

Therefore, an allocation that is not consistent with the Board's Landscape Strategy and Guidelines would also not be consistent with the Cotswolds AONB Management Plan.

Policy CE1 (paragraphs 2) of the Management Plan adds that:

- *Proposals that are likely to impact on, or create change in, the landscape of the Cotswolds AONB, should have regard to the scenic quality of the location and its setting and ensure that views – including those into and out of the AONB – and visual amenity are conserved and enhanced.*

Based on the available evidence base, the proposed allocations do not comply with this policy.

Policy SD7 (Cotswolds AONB) of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (which the Tewkesbury Borough Plan has to comply with) states that:

- *Proposals [for development in or within the setting of the Cotswolds AONB] will be required to be consistent with the policies set out in the Cotswolds AONB Management Plan.*

As such, the evidence base for the proposed allocations also fail to comply with the policies of the Joint Core Strategy.

YOUR COMMENTS

This consultation seeks your views on the policies and sites that are presented in the Preferred Options plan.

We want to know whether you support or object to what is being proposed and, importantly, your reasons why.

Furthermore, is there anything you think that should be covered by policies in the TBP that are not currently included in the TBP (bearing in mind that the JCS also provides policies for the Tewkesbury area).

Please state the section or policy of the plan that you wish to make a comment on. This will help us understand easily which areas of the plan people have a view on.

Please state which policy, site option or section you are commenting upon? Policy: RES4 (New housing at other rural settlements)			
Please state whether you are (please tick as appropriate)	Objecting v	Supporting	Comment

The Cotswolds Conservation Board's comments are grouped under the following headings:

- A. Reasons for Objecting
- B. Recommendations
- C. Supporting Information

A. REASONS FOR OBJECTING

Policy RES4 does not comply with the National Planning Policy Framework (NPPF), particularly paragraph 78, and Policies SP2 and SD10 of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011-2031. The primary reason for this is that it contradicts the 'settlement hierarchy' approach to locating new housing by pro-actively encouraging development in settlements that are not in the settlement hierarchy. Encouraging such small-scale development could also undermine the provision of affordable housing in the Borough, as small-scale schemes would not normally be required to deliver affordable housing.

B. RECOMMENDATIONS

Policy RES4 should be withdrawn. Instead of having Policy RES4, the Plan could simply advocate Policy SD10 of the Joint Core Strategy.

C. SUPPORTING INFORMATION

Paragraph 78 of the new National Planning Policy Framework (NPPF) states that:

- *To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a nearby village.*

One of the main mechanisms for implementing this requirement is the 'settlement hierarchy'. This hierarchy is based on each settlement's level of service provision and accessibility. It helps to inform where new development should be directed, encouraging close proximity of housing, jobs and services in pursuit of a more sustainable development pattern.

The Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) provides a 'settlement hierarchy' consisting of 'Key Urban Areas' (i.e. Cheltenham and Gloucester), a 'Market Town' (i.e. Tewkesbury), two 'Rural Service Centres' (Bishop's Cleeve and Winchcombe) and a number of 'Service Villages'. Policy SP2 of the JCS (Distribution of New Development) focusses new development in Tewkesbury Borough on these

settlements in this hierarchy. Policy SD10 of the JCS (Residential Development) identifies the circumstances in which housing development on other sites will be permitted.

Policy RES4 contradicts all of these policies, as it specifically promotes residential development (albeit 'very small scale') in rural settlements that are not featured in the 'settlement hierarchy'. This is supposedly as a means of supporting the vitality of rural communities and the continued availability of services and facilities in the rural areas. However, it is the settlement hierarchy that is the primary means of delivering these objectives. Therefore, any policy that actively promotes development in settlements that are not featured in the 'settlement hierarchy' (such as Policy RES4), would not meet these objectives.

As indicated in the 'reason for objecting', above, the provision of multiple, very small-scale residential developments could potentially undermine the provision of affordable housing in the Borough as such developments would probably not be required to contribute to affordable housing provision.

Also, it is not clear why the policy specifically excludes Green Belt but makes no mention of other designations that potentially restrict the overall scale, type or distribution of development in the Plan area (e.g. AONB designation). Rather than exclusively referring to one type of restrictive designation, it would be more appropriate to add a clause, either to this policy (if it is retained) or Policy RES5 to the effect that:

- *Proposals should not be contrary to the policies of the Tewkesbury Borough Plan, the Cheltenham, Gloucester and Tewkesbury Joint Core Strategy or the National Planning Policy Framework.*