

Tewkesbury Borough Council officer comments on the Draft Twyning Neighbourhood Plan (10/12/15)

Thank you for providing us with an opportunity to comment on your policies in the consultation draft Twyning Neighbourhood Plan (TNP). The response below is provided at officer level and responds to specific matters raised during the meeting between TBC and TPC representatives on 10th December 2015. It seeks to offer constructive advice to assist the neighbourhood plan group in refining the plan along with advice that has also been provided during ongoing meetings and communications with parish representatives. This schedule should also be read in conjunction with advice provided on the SEA screening opinion.

References to the strategic policies of the adopted development relate to the 'saved' policies of the Tewkesbury Borough Local Plan to 2011. Not all policies were saved. The list of those that were saved is set out in this [letter from the Secretary of State](http://www.tewkesbury.gov.uk/index.aspx?articleid=1902) which is available on the TBC website at: <http://www.tewkesbury.gov.uk/index.aspx?articleid=1902> . Some of the main saved policies and emerging policies from the Joint Core Strategy (JCS) and Tewkesbury Borough Plan (TBP) that relate to the proposed policies are identified in the table below.

Reference	Consultation Draft NP wording	TBC officer comments
Layout		The plan is attractively presented and reflects on the hard work to date in preparing the document. It is clearly set out, distinguishing policies from supporting justification. The photographs used are particularly eye catching and effective in making the plan attractive to readers.
Policy wording		<p>The government's planning practice guidance states that: A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.</p> <p>Our comments below are mindful of this advice. Additional guidance on writing policies can be found on the <i>Locality</i> website http://mycommunityrights.org.uk</p>
Page 4 (first para)		<p>To avoid confusion the correct term for the currently adopted development plan is <u>the saved policies</u> in the Tewkesbury Borough Local Plan to 2011 (it is noted that this is correctly stated on pg.8).</p> <p>The new plan is called the Tewkesbury Borough Plan. This should be revised in the various places in</p>

		<p>which it occurs throughout the plan.</p> <p>Notwithstanding this, in some places it would be better to refer to the ‘adopted development plan’ as this future-proofs your policies.</p>
Page 4 (5 th para)	<p><i>This document is a draft for consultation with the community and statutory consultees. After this stage amendments may be made before the NDP is submitted to TBC for further independent examination. If successful at examination and after a Parish referendum the policy will be ‘made’.</i></p>	<p>The second sentence could usefully be amended to:</p> <p><u>Any comments received will be considered by the Parish Council and, where appropriate,</u> amendments may be made before the NDP is submitted to TBC for further independent examination.</p>
Page 4 (6 th para)	<p><i>Once made, it will form part of the Borough-wide development plan and become, with the emerging Tewkesbury Borough Local Plan (TLP), the starting point for deciding where development should be located and to what standards.</i></p>	<p>The JCS also forms part of the development plan for Tewkesbury Borough.</p> <p>The reference to ‘Tewkesbury Borough Local Plan (TLP)’ should be amended to ‘Tewkesbury Borough Plan (TBP)’.</p> <p>References to TLP should be to the TBP throughout the plan e.g. on pgs. 5, 15, 20, 33 and especially the glossary pg.53</p> <p>For completeness the Waste Core Strategy and the Minerals Local Plan prepared by Gloucestershire County Council also form part of the statutory development plan.</p>
Page 5 (1 st and 5 th para)	<p><i>‘...review every 5 years..’</i></p> <p><i>In the lead up to the referendum, decision makers should consider this to be an important reference point and give it weight as a material consideration in any</i></p>	<p>Reference to a five year review – there is no mechanism set out to do this. It would be better to refer to annual monitoring of the plan’s implementation by the parish council.</p> <p>In respect of the last sentence the ‘weight’ to be afforded to the emerging plan is commensurate with how far towards its adoption it has reached, noting the extent to which there are any outstanding objections.</p>

	<i>development planning decisions. The Plan holds significant weight in the determination of planning applications.</i>	
Pages 8 and 9		<p>The Localism Act is 2011, not 2012</p> <p>The reference to being ‘in line with higher level policy’ should be revised to read ‘in general conformity with’ – as is stated on pg.9.</p> <p>However there is currently no requirement for the plan to be in general conformity with <u>emerging policy</u>, such as the JCS. Although the NDP is correct in having regard to it.</p> <p>Is the reference to ‘Twyning Green’ to distinguish the settlement of Twyning from the wider parish of Twyning?</p>
Page 9 (first para)	<i>the required development a figure that currently stands at 64</i>	<p>It is assumed that 64 refers to houses.</p> <p>The figure presented is not a ceiling and only represents part of the story in respect of the disaggregation of housing between service villages. The implementation of the emerging JCS policy SP2 will ultimately be through the TBP, however until this is undertaken it is noted that the NDP is working with the emerging figures presented as part of the Tewkesbury Borough Plan Draft Policies and Site Options for Public Consultation document (February 2015).</p> <p>The consultation draft TBP could also be referred to alongside the JCS website link.</p>
Page 9	<i>The NDP is designed to be in general conformity with the policies of the Tewkesbury Local Plan to 2011 in so far as they can be applied to the Parish of Twyning. The saved policies of the NDP where they are in conflict, take precedence</i>	<p>This paragraph is not correct.</p> <p>The NDP, once ‘made’, would only take precedence over the saved policies of the Tewkesbury Borough Local Plan to 2011 – the key point being that those are the ones currently ‘existing’.</p> <p>Assuming that the TBP 2011-2031 is adopted after the NDP is made it is the most recently adopted plan that takes precedence. That said, the NPPF:185 is clear that local planning authorities should avoid duplicating planning processes for non-strategic policies where a NDP is in preparation.</p>

	<i>over existing policies in the Tewkesbury Borough Local Plan 2011-2031.</i>	
Page 9 (last para)	<i>Tewkesbury Borough Local Plan</i>	As above, the three references should be to the 'Tewkesbury Borough Plan' And on pg.16
Page 11	<i>The NDP becomes mature after statutory consultations have taken place and revisions implemented. The submission version will be sent to TBC and the planning inspector. When complete, the Plan will be put to a public referendum..</i>	The last para requires some rewording to reflect the statutory processes that have to be followed: Replace that para with: Preparation of the NDP requires a statutory 6 week consultation period, after which the Parish Council considers all representations made and make revisions to the plan as appropriate. It is then submitted to Tewkesbury Borough Council who have to undertake another statutory 6 week public consultation. The submission version of the plan is then sent to an independent examiner who considers the responses that have been made and prepares a report recommending what should be done. Following receipt of this report Tewkesbury Borough Council has to check the plan for legal compliance before it is put to a public referendum. If over half of those voting support the plan then it would be adopted as part of the development plan for Tywning Parish.
Page 12		County Ecologist comments: The vision says the NDP will be allowing sustainable development but also in doing so protecting green space, the landscape and supporting nature conservation. This is welcomed. Green space, landscape character, ecological networks (wildlife corridors) and SuDS are being given high value. The proposals have some consistency with the Local Nature Partnership's Strategic Framework for Green Infrastructure and the presence of both the 'Tywning' and 'Bushley' Strategic Nature Areas (SNAs) from the Gloucestershire Nature Map could also perhaps be referenced in the final NDP – further details on SNAs are to be found at http://gloucestershirebiodiversity.net/index.php .
Pg.18	<i>Decision makers and applicants must accept the policies as a whole when judging if a proposal would be acceptable.</i>	Once 'made' the NDP would comprise part of the statutory development plan. This carries legal weight that the decision-taker needs to accord with unless material considerations indicate otherwise.
Section 8		Although this section is titled 'strategic policies' it should come after those setting the context for development i.e. sections 11 and 12. Notwithstanding this, given that it refers to housing

		development it would probably better fit within section 12 'Housing Policies'.
Development boundaries and site allocations		<p>TBLP Saved policies HOU2-5 relate to Residential Development Boundaries.</p> <p>The Tewkesbury Borough Local Plan (TBLP) identifies a Residential Development Boundary around Twyning village (delineated by a brown dashed/dotted line). This is the currently adopted development plan for the borough. However, some saved policies have been considered out of date by Inspectors at appeals due to a lack of a borough-wide 5 year housing land supply.</p> <p>The submission JCS Policy SD2 requires that as part of preparing the new Tewkesbury Borough Plan (TBP) a proportionality exercise needs to be undertaken regarding the service villages (as they were at the time) to determine how 'big' each one was (2011 being the base date of TBP). In order to do this it was necessary to define what constituted the 'service village' so that the houses/population/measure area etc. could be counted.</p> <p>Some settlements are fairly dispersed and do not have a clearly defined centre, or 'core village', which made the exercise more subjective in some areas than in others. To understand local opinions this was done through the Service Village Forum and, following individual 'surgeries' with representatives of each service village on 15 May 2014, culminated in a line being drawn around each service village so that the number of houses within that area could be counted.</p> <p>It was made very clear at the time that the lines that were being drawn around service villages through this exercise were not for the purposes of creating a Residential Development Boundary (as exists in the TBLP) and were just for carrying out the proportionality task. To further clarify this an email was sent on 17 June 2014 to the Service Village Forum, via GRCC and the chair/vice chair [Elin Tattersall, Andrew Cocks, Denis Murray], stating:</p> <p style="padding-left: 40px;">In terms of the line around villages that we drew with the SVF representatives, this is the <u>CURRENT</u> extent and is not where future development might or might not go. It was drawn for the purpose of considering the existing size of the SV (in tandem with population and household numbers, noting that census figures do not align perfectly with SV areas) so that JCS policy SP2 can be fulfilled in terms of the 'proportionality' factor. For housing allocations to count against their 'quota' it needs to be well related to the particular service village.</p>

		<p>In terms of the Twynning NDP it is noted that the plan seeks to use the line drawn for the Service Village Forum proportionality exercise as its Residential Development Boundary. It may be that following more detailed consideration by the NDP group that the line does indeed represent an appropriate boundary for the purposes of controlling future development. However, the methodology for defining the 'development boundary' needs to be clearly set out and justified given that it was not initially delineated for this purpose. The starting point should be consideration of the Residential Development Boundary set out in the adopted Tewkesbury Borough Local Plan and then factor in how the village has changed since it was drawn, which may result in a line being drawn akin to that which was used for the service village forum exercise. It needs to be clear why the boundary is appropriate taking into account factors such as landscape, flooding etc that were not taken into account when the service village 'extent areas' were initially drawn.</p> <p>The question as to what constitutes a site at a service village was raised in discussion at the meeting on 10th Dec 2015. The view taken by the local planning authority in preparing the Tewkesbury Borough Pan Draft Policies and Site Options document (Feb 2015) was that a site needs to be 'well related' to a service village in order to count against its housing requirements. This is to prevent developments of housing being pursued in locations that would not be considered suitable on the basis of access to service provision, protection of the countryside in general etc. In this sense 'well related' was taken in a physical sense as being within or adjacent to a service village – the lines drawn around the service villages were used as a basis to indicate where the built form of the development extended. Through NDP preparation some have sought to define 'well related' in a functional sense, for example closely linked within the context of their settlement pattern via accessibility (a public footpath) or service provision.</p> <p>If a site were to be proposed to meet an identified service village housing requirement that is not immediately adjacent to the service village as delineated in the proportionality exercise it would need to be clearly justified how it is otherwise 'well related' to the service village. This could potentially be done through the designation of a wider Residential Development Boundary that is different from the extent of the service village as defined during the proportionality exercise. The approach to defining the Residential Development Boundary would need to be clearly justified.</p> <p>It is noted that two sites A and B are proposed for allocation in the Twynning NDP. These are well</p>
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		<p>related to the service village, being adjacent to the built form, and are already consented thus contributing to meeting the housing need for Twyning service village. See further comments below in respect of policy H1.</p>
<p>Pgs.18, 20 (5th para) and Policy S1</p>	<p>Policy S1 – Development outside the defined Development Boundary of Twyning Green</p>	<p>TBLP saved policies HOU2-9, HOU11, HOU13-14. It is noted that some of these saved policies have been considered out of date by Inspectors at appeals due to a lack of a borough-wide 5 year housing land supply.</p> <p>Emerging JCS policy SP2, SD5, INF1-2</p> <p>Emerging TBP policies HOU1-4</p> <p>Development boundary issue as set out above.</p> <p>The Policy needs to be seen in context of the JCS and TBP growth. Further work on these plans could lead to different growth level for service villages. Therefore plans need to be flexible enough to respond to any changes. The policy precludes future allocations outside of the settlement boundary. The restrictive nature of this policy in the wider context of the housing market within which Twyning Parish sits is therefore unlikely to be acceptable to an Examiner.</p> <p>a) Helping to meet the needs of those living in ‘rural areas’ is quite wide in scope and vague. ‘Rural areas’ covers an almost unlimited area. It is unclear how this criterion would be implemented or its effectiveness. Is the NDP trying to say that market housing should meet local needs? This needs explanation.</p> <p>c) the NPPF:32 test is that residual cumulative impacts need to be ‘severe’ to justify refusal as almost any development is likely to result in an increase in car-borne travel</p> <p>d) in the context of this policy it is unclear what is meant by adversely affecting the ‘vitality and viability’ of settlements. This needs explanation. See Policy LF2</p> <p>e) needs clarification how TPC wish officers to interpret this aspect of the policy.</p>

<p>Policy S2</p>		<p>TBLP saved policies HOU2-9, HOU11, HOU13-14. It is noted that some of these saved policies have been considered out of date by Inspectors at appeals due to a lack of a borough-wide 5 year housing land supply.</p> <p>Emerging JCS policy SP2, SD5</p> <p>Emerging TBP policies HOU1-4</p> <p>As above in terms of the Development Boundary matter.</p> <p>The NDP needs to have flexibility to respond to changing circumstances, for example increases in housing requirements.</p> <ul style="list-style-type: none"> a) It is noted that ‘infill’ development is defined, but within the settlement boundary where does the NDP envisage the ‘small-scale’ sites are for 5 houses, especially given that the supporting text refers to retaining ‘some vacant plots’? Why 5 houses? Where does this figure come from? It needs to be justified in relation to the evidence. b) How is ‘infilling’ intended to occur when ‘open spaces’ within a settlement are being protected? Also see GD1 (part 7). c) What does ‘vitality and viability’ mean in this context? d) needs clarification how TPC wish officers to interpret this aspect of the policy. <p>There is potential incompatibility between policies GD1(7), H2(5&7), H4(2), S1 and S2 that relate to ‘infill’ development – S2 allows it subject to caveats but others seek to restrict it such that it is questioned whether there is any actual potential for infilling at the village of Twyning – as discussed during the meeting on 10 Dec 2015 at which it was stated there was little potential for any infilling in the village. Consequently as currently drafted policies S1 and S2, when read in conjunction with the restrictive infilling policies elsewhere in the plan, do not appear to allow for this flexibility and as such would be unlikely to be acceptable to an Independent Examiner. Greater explanation as to how flexibility can be achieved is therefore required.</p>
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Policy GD1	<p>Criteria 7 <i>'important gaps and open spaces, which contribute to the character and appearance of the locality, shall be maintained in accordance with Policy GD2;'</i></p>	<p>TBLP saved policies: GNL2 design requirements for major development proposals; HEN2 the setting of conservation areas; LND3 landscape protection zones, LND4 countryside;LND7 landscaping; and NCN3, NCN5 and NCN6 for nature conservation, where these are in conformity with the NPPF.</p> <p>Emerging JCS policies: SD5 design; SD7 landscape; SD9 historic environment; SD10 biodiversity; and INF4 green infrastructure.</p> <p>Emerging TBP policies: ENV1-6 relate to the environment/landscape; and HER1-6 to historic assets.</p> <p>See comments for Policy S2 in terms of compatibility between policies GD1(7), H1, H4(2), S1 and S2 that relate to 'infill' development.</p>
Policy GD2		<p>TBLP saved policies: GNL2 design requirements for major development proposals; HEN2 the setting of conservation areas; LND3 landscape protection zones, LND4 countryside;LND7 landscaping; and NCN3, NCN5 and NCN6 for nature conservation, where these are in conformity with the NPPF.</p> <p>Emerging JCS policies: SD5 design; SD7 landscape; SD9 historic environment; SD10 biodiversity; and INF4 green infrastructure.</p> <p>Emerging TBP policies: ENV1-6 relate to the environment/landscape; and HER1-6 to historic assets.</p> <p>Is this landscape policy better suited to the landscape section (no.16)?</p> <p>Criterion 1 includes views to/from 'Listed Buildings and Conservation Areas'. This potentially relates to their setting and as Policy GD1 refers to 'historic character' it therefore may be more appropriate to put this aspect into that earlier policy.</p> <p>Proposed Policy GD2 (landscape and bio-diversity criterion) provides a mechanism to enhance biodiversity through sustainable development. However to be generally compliant with the NPPF we</p>

		would suggest in the second sentence after 'opportunity' the words 'where possible' are added.
Policy GD3	<i>Local parking standards</i>	<p>TBLP policy TPT12 was not saved. Saved policy EVT9 relates to drainage.</p> <p>Emerging JCS policy SD5 does not specify parking standards.</p> <p>There was discussion at the meeting on 10/12/15 about the retention/deletion of this policy based on how local parking standards could be expressed in a NDP. TBC officers need to know what the parish considers to be 'sufficient' in different circumstances – the interpretation could be different and we are trying to understand the author's intentions.</p> <p>Consideration of local parking standards should accord with the criteria in NPPF:39, which states:</p> <p>If setting local parking standards for residential and non-residential development, local planning authorities should take into account:</p> <ul style="list-style-type: none"> ● the accessibility of the development; ● the type, mix and use of development; ● the availability of and opportunities for public transport; ● local car ownership levels; and ● an overall need to reduce the use of high-emission vehicles. <p>If this policy is retained text should be added to the supporting text after the policy (or as an appendix) to set out what sufficient' means.</p> <p>If retained should it be put into the 'transport' section (no.15)?</p>
Policy GD4		
Policy GD5	<i>Flooding</i>	<p>TBLP saved policies: EVT5 and EVT9 flood and SUDs.</p> <p>Adopted SPD on Flood and Water Management Emerging JCS policy INF3 flood mgt and SUDs</p> <p>Emerging JCS policy INF3 flood mgt and SUDs</p> <p>TBC Flood Management Engineer to provide comments (to follow)</p>

		<p>Green infrastructure is covered by GD1, GD2 and ENV2 but not in GD5 (which it could have been given its title of 'infrastructure capacity').</p> <p>Policy GD5 is really about managing surface and foul water so maybe it is better incorporated into Policy GD9 (water resources, quality and flood risk)?</p>
Policy GD6		TBLP saved policies: EVT2 light pollution
Policy GD7		TBLP saved policies: EVT2 light pollution
Policy GD8		<p>TBLP saved policies: GNL13 advertisements</p> <p>There is no TBLP saved policy relating to the issue of waste recycling. But see emerging JCS policy SD4 (reasoned justification).</p> <p>Gloucester Waste Core Strategy Policy WCS1 (NB the Waste Core Strategy forms part of the development plan and is prepared by Gloucestershire County Council).</p>
Policy GD9		See comment above re: GD5
11. Housing Growth		<p>It would make more sense for section 8 which places restrictions on development to come after sections 11 and 12 as these set the context.</p> <p>To justify the approach taken to allocating an 'appropriate' level of housing in the NDP a standard form of wording has been suggested by TBC to other NDP groups for insertion into their plans. Although this text is yet to be tested at Examination TBC is endeavouring to assist the NDP group in explaining to the Examiner (and readers of the plan) the context within which the quantum of development has been reached. The text is set out at the end of this table. The overall quantum of development is 880 houses, rather than 752, but this figure is still subject to change.</p> <p>The Plan identifies in the third para on pg.32 the commitment of 22 at Fleet Lane but does not refer to the 58 at land at Brockeridge Lane as a commitment. Yet they are both put forward as allocations. There needs to be consistency with how they are treated. i.e. they are both existing commitments totalling 80 dwellings which the NDP is seeking to allocate. This can be then seen in context of the</p>

		<p>67 homes that was identified in the disaggregation process. This applies for pgs. 32 and 33.</p> <p>The statement in the third para on pg.32 that the ‘remaining service villages appear capable of meeting the required housing requirement’ prejudices the outcome of the TBP disaggregation process. It therefore needs to be removed or rephrased as this situation may not be correct.</p> <p>Notwithstanding that the current draft disaggregation puts 67 dwellings to Twyning, not 64, this section needs to be clear that the disaggregated housing number is indicative and changes to the JCS/TBP could alter the position. The plan needs to be flexible to allow for this.</p>
<p>Section 12 Policy H1</p>	<p><i>Site allocations</i></p>	<p>TBLP saved policies HOU2-9, HOU11, HOU13-14. It is noted that some of these saved policies have been considered out of date by Inspectors at appeals due to a lack of a borough-wide 5 year housing land supply</p> <p>TBLP saved policies: accessibility TPT1, TPT3, TPT5, TPT6, TPT9;</p> <p>Emerging JCS policy SP2, SD5, INF1-2. Policies INF1 and INF2 transport and access.</p> <p>Emerging TBP policies HOU1-4, TRAC1, TRAC2, TRAC3</p> <p>The housing figures are not ‘targets’ in that they do not provide a ‘maximum’ quantum. The supporting text following the policy needs to be clear that the disaggregation process is only PART of implementing JCS policy SP2.</p> <p>The reference to Policy S2 being ‘permissive of organic growth’ is limited by the restrictions to infilling as referred to through other policies (as noted for Policy S2) – as per the discussion on 10/12/15 it appears that there is actually very little potential for infilling in the village.</p> <p>The site selection approach needs to be clearly set out and be backed by evidence (including consideration of alternative sites – you will need to be able to demonstrate to the Independent Examiner that you have considered alternative options). It is noted that the parish has identified these parcels on the basis of their deliverability i.e. permission having already been granted, and therefore this approach needs to be clearly explained. Anecdotal community opinion derived from consultation exercises is only one part of the evidence base. It is noted that the purpose of identifying them as development sites in the NDP is in case either of the sites does not get developed under the current permissions.</p>

Policy H2		<p>There is duplication between:</p> <p>Criterion 3 and policy GD1 (criterion 5)</p> <p>Criterion 4 and policy GD1 (criterion 1)</p> <p>Criterion 8 duplicates policy GD3</p> <p>The open space requirement under criterion 5 (and policy GD1 criterion 7) is potentially incompatible with the approach to infilling elsewhere in the plan.</p> <p>The last part of the policy does not have a bulleted number, should it be No.9?</p>
Policy H3 Affordable Housing		<p>TBLP saved policies HOU13 and HOU14. However HOU13 relates to the plan period and could therefore be considered out of date. TBC Affordable Housing SPG (2006). Emerging JCS policy SD13 (but this has been subject to debate during JCS examination).</p> <p>Housing Officer comments:</p> <p>P35 “The affordable units will be provided for those individuals in housing need with a local connection as agreed with Twyning Parish Council and will remain affordable in perpetuity.”</p> <p>Are the parish stating that local connection is to be agreed with them? The local housing authority (us) deals with allocations not the parish and so this is not acceptable.</p> <p>The phrase in the supporting text ‘as agreed with Twyning Parish Council’ needs to be removed as it is the Local Planning Authority’s decision, and replaced with ‘in accordance with TBC housing allocation policy’.</p> <p>Please be aware that the ‘in perpetuity’ element refers to the funds available rather than the bricks and mortar, which could change over time. This should be made clear in the text.</p>
Policy H4		TBLP saved policies HOU5-11

		<p>Emerging TBP policies HOU2-9</p> <p>Typo – ‘incidental’ instead of ‘incremental’</p>
Policy H5		<p>TBLP saved policies HOU12</p> <p>Emerging TBP policy HOU7</p>
Section 13 Policy LF1		<p>TBLP saved policies GNL11, GNL15, RCN1-4</p> <p>Emerging JCS policies INF4 and INF8</p> <p>Emerging TBP policy IRC1 and TRAC1-3, RCN1-2</p> <p>Reference to planning obligations – legal advice to remove this sentence.</p> <p>The supporting text to Policy LF1 (infrastructure) should perhaps describe other items such as green spaces, highways, schools etc.?</p>
Policy LF2		<p>Saved TBLP policies RET3-6, 8-9</p> <p>Emerging TBP policies RET 3-6</p> <p>Cross ref to Policy S1(d) and S2 in respect of ‘vibrancy and vitality’</p>
Economy Policy E1		<p>TBLP saved policies: EMP2, EMP3, EMP4 and EMP5.</p> <p>Emerging JCS policy SD2 relates to employment issues.</p> <p>Emerging TBP policies DES2 and EMP2-5 cover these type of issues.</p> <p>Small/large scale – what is intended by these scales? TBC interpretation may differ from TPCs. Policies need to be clear and unambiguous.</p> <p>Not all rural buildings being converted for business use are easily accessible by means other than motor vehicles. Is it the intention to rule out such developments as per the current policy approach?</p> <p>Remove ‘local’ in first criterion</p>
Policy E2		<p>TBLP saved policies EMP2 and EMP4</p> <p>Emerging TBP policy EMP2</p>
Policy E3		<p>No saved policies on Broadband provision</p>
Transport Policy TP1		<p>TBLP saved policies: accessibility TPT1, TPT3, TPT5, TPT6, TPT9;</p> <p>Emerging JCS policy INF1 and INF2 transport and access.</p> <p>Emerging TBP policy TRAC1, TRAC2, TRAC3</p>

		<p>As per policy E1, GCC Highways have commented that,:</p> <p>In terms of the transport policies, TP1 refers to significant impact, this could refer to severe to align with the NPPF:32.</p> <p>See also comment in respect of policy S1 criterion c</p>
Policy TP2		<p>TBLP saved policies: accessibility TPT1, TPT3, TPT5, TPT6, TPT9; Emerging JCS policy INF1 and INF2 transport and access. Emerging TBP policy TRAC1, TRAC2, TRAC3</p> <p>This policy currently rules out development in particular locations, as per E1, is this what is intended by the parish council?</p>
Section 16. Landscape and Environment		<p>GCC Ecologist comments:</p> <p>The topic of biodiversity (ecology/wildlife) is adequately covered but the list presented of assets on page 49 should say that Brockridge Common is a 'Key Wildlife Site' and marked up as such on the map at Appendix E. It might also be useful to say in the NDP that adjacent and not far away from the parish boundary lies both Rectory Farm Meadows SSSI and Bredon Hill SSSI & SAC (European Site). Further details on the Key Wildlife Sites are available from Gloucestershire Centre for Environmental Records at http://www.gcer.co.uk/ and SSSIs from Natural England at https://www.gov.uk/protected-or-designated-areas .</p>
Policy ENV1		<p>TBLP saved policies: NCN3, NCN5 and NCN6 for nature conservation, where these are in conformity with the NPPF. Emerging JCS policies: SD10 biodiversity; and INF4 green infrastructure. Emerging TBP policies: ENV1-6 relate to the environment/landscape</p> <p>GCC Ecologist comments:</p> <p>Policy ENV1 covers significant biodiversity assets which are mapped at Appendix E (see comment above on this). In this policy it is advised that the words 'will be resisted' should be changed to 'would be unacceptable'.</p>
Policy ENV2	<i>Local Green Spaces</i>	<p>TBLP has no policies relating to Local Green Space Designation.</p> <p>It is a matter for the parish council to decide which particular locations they wish to put forward for Local Green Space designation, but whichever ones are chosen each needs to be clearly justified in respect of the criteria set out in NPPF:76 .</p>

		<p>A question was raised in terms of land owner involvement - the Government's planning practice guidance advises:</p> <p>Does land need to be in public ownership? A Local Green Space does not need to be in public ownership. However, the local planning authority (in the case of local plan making) or the qualifying body (in the case of neighbourhood plan making) should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space. Landowners will have opportunities to make representations in respect of proposals in a draft plan.</p> <p>Would designation place any restrictions or obligations on landowners? Designating a green area as Local Green Space would give it protection consistent with that in respect of Green Belt, but otherwise there are no new restrictions or obligations on landowners.</p> <p>The designation therefore does not depend on the permission of the landowner, and in some ways is therefore akin to any other planning use designation. Instead, contact should be made with landowners at "an early stage" about any proposals to designate their land. Landowners will then have opportunities to make representations in respect of the proposals appearing in a draft plan (that they may have indeed already indicated their objection to).</p> <p>If local green spaces are identified, then the policy needs to be consistent with NPPF tests for Green Belt (see NPPF:87-89). And the lettering used in the text to identify each location should then be shown on the appropriate map for clarity and ease of reference.</p>
Policy ENV3		<p>TBLP saved policies RCN1-4, GNL15 Emerging JCS policy INF5 Emerging TBP policies IRC1, RCN1-2</p> <p>It is noted that although this policy is in Section 17 its number annotation sequentially follows those in section 16.</p>
Archaeology		GCC archaeologist had no comments
Flooding (Lead Local Flood		The Lead Local Flood Authority (LLFA) will, if requested to do so, provide advice to Local Planning Authorities on the management of surface water and associated flood risk relating to major

Authority)		planning applications.
Monitoring		The plan should contain greater detail in respect of how its implementation is to be monitored.

Objectively Assessed Housing Needs

The XXXX neighbourhood plan has been prepared taking into account the latest figuresⁱ for the objectively assessed housing need for the wider local area (Tewkesbury borough), which sits within the context of the Gloucestershire housing market area. The objectively assessed need for the Tewkesbury borough area, as set out in the evidence base for the emerging Joint Core Strategy, indicates 10,100 homes need to be provided during the Joint Core Strategy plan period 2011-2031. It is against this figure that the 5 year housing land supply is calculated. Consequently it is on that basis that the neighbourhood plan's housing needs have been considered. At the strategic level Tewkesbury borough has agreed to contribute to fulfilling unmet need from Cheltenham and Gloucester under the duty to cooperate as set out in Joint Core Strategy Policy SP2.

For the purposes of providing sufficient homes the Joint Core Strategy Policy SP2 sets out a spatial strategy to delivering housing that primarily seeks to concentrate new development in and around the existing urban areas of Cheltenham and Gloucester and elsewhere in Tewkesbury borough following a hierarchical approach to allocating housing by identifying Tewkesbury town, Rural Service Centres and Service Villages as locations for lower levels of housing development. XXXX is a settlement which has been identified in the Joint Core Strategy as a Service Village. Together these Service Village settlements are expected to accommodate 880 homes over the 20 year plan period 2011-2031. This figure has been derived through a consideration of historic housing delivery across the rural parts of the borough along with an uplift to provide flexibility and a boost to housing supply.

As a Service Village, XXXX settlement needs to provide for a share of the need for new homes that the draft Joint Core Strategy and Tewkesbury Borough Plan are likely to identify. These lower levels of development for Tewkesbury borough are to be determined through the Tewkesbury Borough Plan and neighbourhood plans. An indicative housing disaggregation process was undertaken for the Tewkesbury Borough Plan Draft Site Allocations and Policies document (February 2015). The methodology followed the requirements in the emerging Joint Core Strategy (Policy SP2) and derived figures for each Service Village proportional to their size and function, and also reflecting their proximity and accessibility to Cheltenham and Gloucester. The further requirement under Policy SP2 to take into account the environmental, economic and social impacts are matters that preparation of this neighbourhood plan have subsequently taken into account.

However, as of September 2015 there has already been XXXX units committed between the Service Villages leaving a balance of XXX to be found up to 2031, which equates to XX year's housing requirement remaining (based on an annual requirement of XX units). Consequently, it was noted that housing requirements for the majority of the plan period have already been permitted or committed across the Service Villages.

ⁱ The Joint Core Strategy housing evidence is provided primarily in the Housing Background Paper Update November 2014. At the time of preparing the neighbourhood plan the Joint Core Strategy was being examined and therefore not adopted, however the planning appeal inspector's report for Moat Farm, Gotherington, Cheltenham (23 September 2015, reference: APP/G1630/W/15/3002522) states that 'the current housing land supply is between 2.7 and 3.9 years, depending on which requirement figure

the supply is measured against. The lower figure relates to the now revoked South West Regional Strategy (RS), and the higher is based on the emerging JCS... The RS figure is clearly no longer up to date, and there is no evidence that it was ever intended to be based on the district's own objectively-assessed needs. The JCS-based requirement is preferable in both of these respects.'