

Planning Policy Context

**A review of adopted and emerging Development Plan policies that
provide the policy context for the**

Ashchurch Rural Neighbourhood Development Plan 2020-2031

May 2021

STRATEGIC PLANNING POLICY CONTECT

The Development Plan

1. The Development Plan for the NDP is:
 - i. Saved policies of the Tewkesbury Borough local plan to 2011
 - a. Flood and Water Management Supplementary Planning Document March 2018
 - ii. Joint Core Strategy 2017
 - iii. Minerals Local Plan for Gloucestershire (2018 - 2032)
 - iv. Gloucestershire Waste Core Strategy 2027
 - v. Saved policies from the Waste Local Plan

2. The Emerging Development Plan for the NDP is:
 - i. Joint Core Strategy Review
 - a. Ashchurch Concept Masterplan
 - ii. Tewkesbury Borough Plan 2011 to 2031 (Tewkesbury Borough Plan Pre-Submission consultation (October 2019/2020))

National Planning Practice Guidance (PPG)

3. National Planning Practice Guidance (PPG) clarifies processes and approaches for the delivery of the planning system. It is prepared by the Government and therefore reflects the most up to date approaches expected of planning practitioners.
4. It states that Neighbourhood plans are not obliged to contain policies addressing all types of development. However, where they do contain policies relevant to housing supply, these policies should take account of latest and up-to-date evidence of housing need.¹
5. Neighbourhood plans are encouraged to plan to meet their housing requirement, and where possible to exceed it. Any neighbourhood plan policies on the size or type of housing required will need to be informed by the evidence prepared to support relevant strategic policies, supplemented where necessary by locally-produced information. When strategic housing policies are being updated, neighbourhood planning bodies may wish to consider whether it is an appropriate time to review and update their neighbourhood plan as well. This should be in light of the local planning authority's reasons for updating, and any up-to-date evidence that has become available which may affect the continuing relevance of the policies set out in the neighbourhood plan.²
6. Neighbourhood plans may consider infrastructure requirements such as:
 - what additional infrastructure may be needed to enable development proposed in a neighbourhood plan to be delivered in a sustainable way
 - how any additional infrastructure requirements might be delivered

¹ 040 Reference ID: 41-040-20160211, 11 02 2016

² 103 Reference ID: 41-103-20190509 Revision date: 09 05 2019

- what impact the infrastructure requirements may have on the viability of a proposal in a draft neighbourhood plan and therefore its delivery
 - what are the likely impacts of proposed site allocation options or policies on physical infrastructure and on the capacity of existing services, which could help shape decisions on the best site choices.³
7. A draft neighbourhood plan must be in general conformity with the strategic policies of the development plan in force if it is to meet the basic condition. Although a draft neighbourhood plan is not tested against the policies in an emerging local plan the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. The local planning authority should take a proactive and positive approach, working collaboratively with a qualifying body particularly sharing evidence and seeking to resolve any issues to ensure the draft neighbourhood plan has the greatest chance of success at independent examination. The local planning authority should work with the qualifying body so that complementary neighbourhood and local plan policies are produced. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies.⁴

³ 045 Reference ID: 41-045-20190509, Revision date: 09 05 2019

⁴ 009 Reference ID: 41-009-20190509, Revision date: 09 05 2019

Joint Core Strategy

Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011-2031 (JCS)

8. The JCS, adopted December 2017, is the only adopted planning policy, and forms part of the Development Plan for the NDP.
9. Tewkesbury Borough is described on page 10 of the JCS setting Tewkesbury as a market town surrounded by smaller settlements such as Ashchurch. The document states that

2.23 The character of the rural area will be protected and enhanced. Opportunities for farm diversification for employment or rural tourism can further support the rural economy and will be encouraged. There are existing pockets of rural deprivation, partly the result of isolation from key services or employment opportunities. These issues will be addressed through the conversion of vacant and derelict premises, development of appropriate-scale businesses and better broadband provision. Additional housing will help to support existing and new services in rural areas and help to improve selfsufficiency of rural settlements.

2.24 Public transport will be improved, particularly the access between the larger rural settlements and the main urban areas. The role of Ashchurch for Tewkesbury railway station will be enhanced to provide good quality services and facilities to serve the area.

2.25 By 2031, the rural areas will be prosperous and playing their part in the economy of the JCS area. Rural communities will be vibrant and not simply dormitories for the urban areas, with good access to services and availability of affordable housing. In addition to any special provision through a Green Infrastructure Strategy, distinctive landscape character will have been protected, landscape features maintained and enhanced, and the countryside will be richer in wildlife with improved access for all. The tranquillity of the countryside will have been safeguarded, and noise and light pollution minimised. New development will be appropriate in scale, design and energy efficiency. The Green Belt will be managed to enhance its contribution to the landscape, biodiversity and access.

2.26 Areas of the borough which lie at the edges of Gloucester and Cheltenham will play an important role in accommodating development through urban extensions.

10. Over the JCS area, it has proven a challenge to meet the objectively assessed need for housing due to significant constraints such as the Cotswold AONB, flooding and green belt.⁵
11. The supporting evidence for the JCS considered a number of options where to focus housing developments. The possibility of a new town, as one option, was considered and rejected in favour of the JCS approach which removed land from the Green Belt.⁶
12. The JCS Strategic Objectives seek to build a strong and competitive urban economy, ensure the vitality of town centres whilst supporting a prosperous rural economy. Objective 3 on the rural economy seeks to support the needs of agricultural businesses and safeguarding the provision and retention of village shops.⁷
13. Policy Sp1 sets out the need for approximately 35,175 new homes (9,899 to be delivered in Tewkesbury Borough) and a minimum of 192 ha of B-class employment land. Areas of the borough which lie at the edges of Gloucester and Cheltenham will play an important role in accommodating

⁵ JCS para.2.33

⁶ JCS para 2.34.

⁷ JCS page 13

development through urban extensions. Economic growth was planned for the entire area but focusing on the M5 Growth Corridor, rather than on a strictly pro-rata basis for each Borough.⁸

14. The spatial strategy was based on the understanding that Gloucester and Cheltenham cannot wholly meet their development requirements which would need to be met by collaboratively working with neighbouring authorities.⁹ Within the JCS area, new development will be concentrated around Cheltenham and Gloucester though the land may fall within Tewkesbury Borough.¹⁰ Tewkesbury Town will take some development but “the rural areas will accommodate a lower amount of new development, most of which already has planning permission”.¹¹
15. Policy SP2 and the supporting tables indicates that there are no settlements in Ashchurch Parish that are mentioned in the Settlement Hierarchy (Table SP2c) and therefore, Clause 6. “In the remainder of the rural area, Policy SD10 will apply to proposals for residential development.”
16. The JCS considered the sustainability of rural villages in the Rural Settlement Audit (discussed in the following paragraph) which supported the conclusion that no settlements in Ashchurch Parish met the criteria of “Service Villages”. The JCS seeks to accommodate 2,740 homes in Tewkesbury Borough’s service villages and rural service centres (which do not exist within the Ashchurch Rural parish).
17. The JCS Rural Settlement Audit (July 2017 refresh) which describes Ashchurch as a “fringe settlement” where “consultation work to date reveals that many residents of the larger settlements in Tewkesbury Borough view them as villages with limited services, essentially rural in nature, and separate and distinct from the urban areas.” Ashchurch Parish contains 7 settlements. Their accessibility Score is as follows:

Settlement	Total services and access score (max 48)	Overall rank (out of 74)
Ashchurch	28	9
Aston Cross	8	37
Aston on Carrant	4	58
Fiddington & Claydon	11	32
Natton	na	na
Pamington	11	32
Walton Cardiff	7	39

18. **Therefore, the JCS does not anticipate significant numbers of new houses to be provided in Ashchurch Rural Parish.**
19. Para. 3.2.16 of the JCS indicates that due to significant constraints and availability of land it has not been possible to allocate sites in the JCS to meet all of Gloucester’s need over the plan period. Nevertheless, Gloucester has a good supply of housing land for the short to medium term that will enable it to meet its requirements to at least 2028/29. **Therefore, it may be the case that towards the end of the plan period, there may be a shortfall of housing land to meet the objectively assessed need. The conclusion is that an early review of the JCS is required in order to address this future shortfall.** “This would also allow the consideration of additional development options that may become available, both within and outside the JCS area. This could include the unlocking of further development opportunities within the urban area, as well as potential new urban extensions in Tewkesbury Borough and Stroud District or elsewhere in the housing market area.”

⁸ JCS para 3.3.13

⁹ JCS para. 3.2.2

¹⁰ JCA para 3.2.4

¹¹ ibid.

20. JCS para. 3.2.17 highlights the withdrawal of the MOD Ashchurch site and suggests that a review of the JCS would consider additional housing provision:

As a result Tewkesbury Borough has an identified shortfall against the total JCS requirement of approximately 2,450 dwellings. Nevertheless, there are opportunities for development at the MoD Ashchurch site within the plan period if infrastructure constraints can be overcome to release available parts of the site. Similarly there is potential for development at a site at Fiddington once the highway infrastructure needs around the A46 and M5 Junction 9 are established. While these sites cannot be allocated now due to uncertainties over their deliverability and capacity, a commitment has been set out in the Delivery, Monitoring & Review section to undertaking an immediate review of Tewkesbury's housing supply so that further work on the development potential around the Tewkesbury town and Ashchurch area can be carried out.

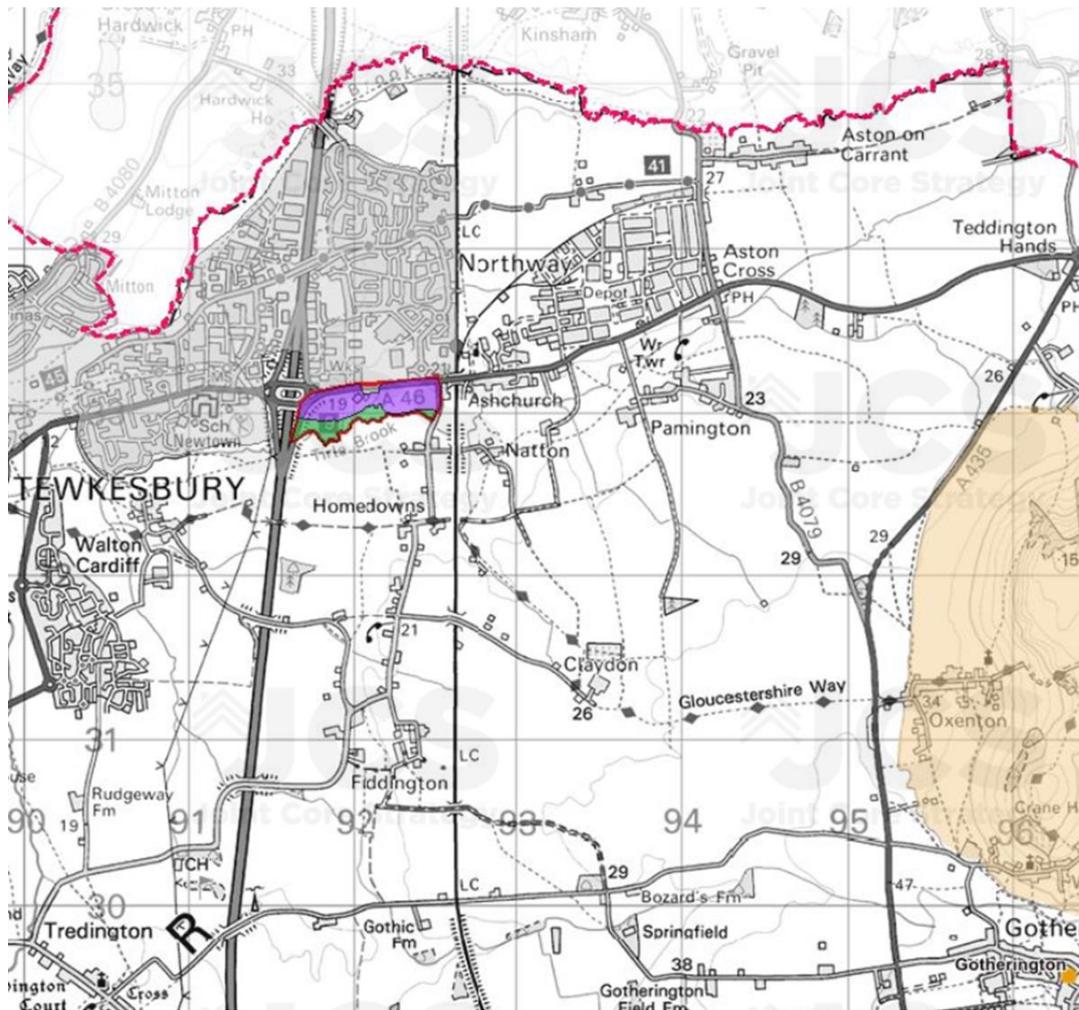
21. The case to immediately review Tewkesbury's housing supply is greater than for the JCS area as a whole. Para. 3.2.18 indicates that there is sufficient supply of housing land for the early parts of the plan period but that there will be a shortfall during the middle of the plan period.
22. Policy SD6 Landscape seeks to protect landscape character for its own intrinsic beauty and for its benefit to economic, environmental and social well-being. Proposals will have regard to the local distinctiveness and historic character of the different landscapes in the JCS area, drawing, as appropriate, upon existing Landscape Character Assessments and the Landscape Character and Sensitivity Analysis. The landscape sensitivity is discussed below in the review of the Landscape Sensitivity Study.
23. Policy SD10 makes provision for housing on unallocated sites or outside the settlements identified in the settlement hierarchy. Clause 4 applies:

Housing development on other sites will only be permitted where:

- i. It is for affordable housing on a rural exception site in accordance with Policy SD12, or;*
 - ii. It is infilling within the existing built up areas of the City of Gloucester, the Principal Urban Area of Cheltenham or Tewkesbury Borough's towns and villages except where otherwise restricted by policies within District plans, or;*
 - iii. It is brought forward through Community Right to Build Orders, or;*
 - iv. There are other specific exceptions / circumstances defined in district or neighbourhood.*
24. In order to deliver Policy SD10, SP1 and SP2, Tewkesbury Borough will include allocations for new housing at rural service centres and service villages, proportional to their size and function, and also reflecting their proximity and accessibility to Cheltenham and Gloucester.¹² **Therefore, in Ashchurch Rural parish, housing should be directed to existing built up areas only, since there are no service centres or villages in the parish.**
25. Policy A5 Ashchurch makes a strategic allocation for 14 ha of employment land, 5 ha of green corridor along the Tirlle Brook and a belt, flood risk management, access from A46 and Fiddington Lane, traffic mitigation, public transport, enhance rail passenger service and pedestrian and cycle links. The only publicly available version of the site allocation is the electronic version of the JCS. The employment land and allocation are cut and pasted in **Figure 1** for reference: Purple denotes employment allocation, green denotes Green Infrastructure, the red line denotes Strategic Allocations boundaries.

¹² JCS para. 4.10.8

Figure 1: excerpt from JCS electronic map



Source: JCS Policies Map Adopted Version 11 December 2017 - Electronic

Joint Core Strategy Review (JCSR)

26. An issues and options consultation was held in late 2018 for the JCSR. Regarding the spatial strategy, the JCSR puts forward three options:

- i. Urban focus: concentration of development in urban areas;
- ii. Urban extensions: growth closest to where it is needed;
- iii. New Settlement: meet future need in the form of a new town or village that could be planned “from the beginning”
- iv. Rural dispersal: many smaller villages accepting housing allocations.¹³

27. The new Standard Method and other growth considerations have led to the conclusion that the JCSR should provide for 1,780 houses per year as opposed to the current JCS level of 1,760 houses per year.¹⁴

¹³ JCSR pages 13-14

¹⁴ JCSR, para. 8.4

28. The JCSR implies that additional employment land will be required over the extended plan period but does not set out how much.¹⁵

29. The JCSR pays particular regard to Ashchurch as follows:

12.3 It is noted in the adopted JCS that the housing shortfall for Tewkesbury was exacerbated by a decision during the examination process of the Defence Infrastructure Organisation (DIO) to stop the release of the MoD Ashchurch site, a proposed strategic allocation. However, the JCS sets out that there remains development potential in the wider Ashchurch area to help meet the housing requirements of the area and there was a commitment in the plan to continue to explore this.

12.4 Tewkesbury Borough Council was successful in securing Homes England capacity funding to support the delivery of growth in the area both within and beyond the current JCS plan period. This work continues to explore the potential of the MoD land as well as other sites in the wider Ashchurch area.

12.5 To take this forward, Tewkesbury Borough Council has commissioned strategic-scale master planning work for this area to provide a comprehensive assessment and approach to development potential which addresses key issues such as place making, transport infrastructure, community facilities, social and green infrastructure. This work is being undertaken to help inform the JCS Review.

12.6 The Ashchurch area is of particular strategic importance in helping to meet the housing and employment needs. In terms of location, it holds an advantageous position next to M5 junction 9 giving it direct motorway access and so making it particularly attractive as an area of employment growth. It is also positioned around the 'Ashchurch for Tewkesbury' railway station, providing significant opportunities for sustainable transport movements.

12.7 The 'Ashchurch Concept Masterplan' has been produced to show how future development could come forward in this area and is available on the JCS web-site (under JCS Review) as a background paper to this consultation.

Ashchurch Concept Masterplan

30. Tewkesbury Borough Council commissioned consultants to prepare a masterplan with the following objectives which was published in January 2018:

- Provide a holistic spatial growth strategy for the area
- Support the strategic level development plan making process for Ashchurch and the surrounding areas
- Stimulate the delivery of homes and employment to meet Tewkesbury's need
- Provide assistance for determining planning applications for this area¹⁶.

31. The JCSR issues and options paper was published around 10 months after the masterplan was released publicly. The JCSR considered a number of settlement strategies, yet the Masterplan considers only one: a new settlement at Ashchurch. **The objectivity of the JCSR must therefore be questioned as it would appear that the "new settlement" option was a foregone conclusion.**

32. The Concept Masterplan is based upon the GFirstLEP M5 growth zone because of its good road and rail connectivity. The removal of the MOD site from the local plan led to a shortfall of 2,450 dwellings

¹⁵ JCS, section 10.

¹⁶ Concept Masterplan Report January 2018, page 4.

in the Tewkesbury housing supply and 20 ha of employment land. The Ashchurch area is being considered as a location for replacement allocations.¹⁷

33. **The Concept Masterplan incorrectly summarises the character of Ashchurch as “the Ashchurch area consists of more modern development. It comprises two industrial areas, Tewkesbury Business Park and Ashchurch Business Centre; the MoD Ashchurch site; and the residential district of Northway, all of which have developed in a linear form along the north of the A46”. This is correct for the northern portion of Ashchurch Parish but it is not a fair description of the rural area to the south of the A46. The statement that “Ashchurch currently functions as a suburb of the main historic town centre of Tewkesbury”¹⁸ is also incorrect: it would be more accurate to describe it as a “a built up area around the A46 corridor with a substantial rural hinterland”. Overall, the Concept Masterplan paints a picture of Ashchurch as already a suburban extension to Tewkesbury which is misleading.**
34. The Concept Masterplan discusses the removal of the MOD site from consideration from the current Emerging Local Plan and states that the site will be partially and potentially released earlier. **The document gives no certainty that the site will be available in the next 5 or 10 years. The NDP must conclude that it would be wrong to include the MOD site as a land allocation in the JCSR because it cannot be certain that the site will be “deliverable” according to the NPPF definition. This MOD site should therefore be excluded from consideration for the JCSR.**
35. The masterplan suggests a number of development principles for the area. Since the masterplan area covers the majority of the NDP area, these should be taken into consideration by the NDP though they are not adopted policy and bear little material weight. The development principles¹⁹ are:
 - i. Define a local character for Ashchurch – this assumes that St Nicholas church is the only defining character feature and it is suggested that this should be the foundation for a local centre/village green. **This is a flawed approach because it ignores the character of the remaining 6 settlements in Ashchurch.**
 - ii. Put Tewkesbury on the map – **this again, erroneously, refers to Ashchurch as a “surrounding suburban area” of Tewkesbury Town.** It seeks to enhance the function of the railway station and strengthen the functional relationship between Ashchurch and Tewkesbury Town.
 - iii. Build a sustainable community – this seeks to ensure that there is sufficient community infrastructure in place
 - iv. Transformation to a sustainable movement environment – prioritise modal shift to walking, cycling and public transport
 - v. Support infrastructure delivery – deliver new southern relief road for the A46
 - vi. Promote an active, healthy quality of life – support the local community to access natural assets and take part in outdoor activities
 - vii. Create a place within a landscape – create an extensive network of green infrastructure and preserve existing features
 - viii. Create a flexible framework that guides development
36. The Concept Masterplan, replicated in **Figure 2** encompasses a number of communities in Ashchurch Parish: Ashchurch, Aston Cross, , Natton, and Walton Cardiff. Fiddington and Claydon and Pamington are excluded but will feel impacts from the masterplan if it is realised. **These existing settlements are not even mentioned in the concept masterplan as though they do not exist. However, they do exist, and the masterplan is therefore flawed in that it does not take account of settlements that must be incorporated into the wider scheme.**

¹⁷ ibid, page 5.

¹⁸ ibid., page 12

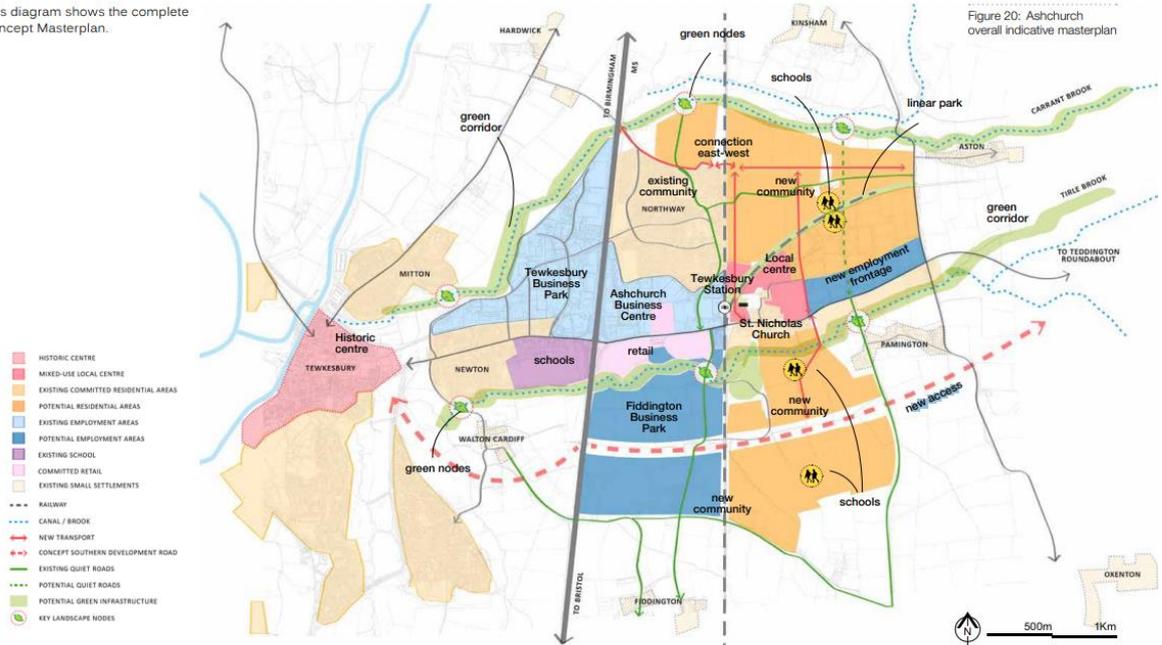
¹⁹ ibid., page 15

Figure 2: Concept Masterplan

BDP, Tewkesbury Area Draft Concept Masterplan Report

3.1 Concept masterplan

This diagram shows the complete Concept Masterplan.



18

Source: Draft Concept Masterplan Report page 18.

The Concept Masterplan has provided an indicating phasing approach which is broken down to short term (phase 1) and long term (phases 2-4). **Figure 3** replicates the phasing strategy delivery. Only Phase 1 is conceived to be delivered by 2031.

Figure 3: Masterplan phasing

MASTERPLAN SUMMARY	Total number of residential units	Employment			Total site area to retail	Total site area to education
	average density 30 units/Ha	Total site area to employment (Ha)	NO. FTEs		(Ha)	(Ha)
			At a job density of 91 FTEs/Ha	At a job density of 145 FTEs/Ha		
PHASE 1	3180	46	4232	6394	2	1.5
PHASE 2	1485	28	2576	3892	0	1.5
PHASE 3	1185	0	0	0	0	1.5
PHASE 4	2160	46	4232	6394	0	1.5
FINAL MASTERPLAN	8010	120	11040	16680	2	6

Source: Figure 32 from the Concept Masterplan.

37. Phase 1 to 2031 is set out in **Figure 4**. It seeks to provide 3,180 new homes, 46 ha of new employment land, a local centre with retail and services, a new primary school and a northern green infrastructure corridor along Carrant Brook within the Emerging Local Plan period. The document acknowledges that there is currently no know solution how transport infrastructure will be brought forward to accommodate this quantum of development.²⁰ **According to the Figure, the NDP could conceivably consider the following masterplan proposals and will impact upon Natton and Ashchurch:**

- i. **L1/5: residential area**
- ii. **3: MOD Hitchins (Aston Field Lane)**
- iii. **15: Land north of Ashchurch Depot**
- iv. **4: MOD HCA Land**
- v. **10: Fiddington**
- vi. **Southern Development Road**
- vii. **Tirle Brook and Carrant Brook and Green Infrastructure**
- viii. **Quiet roads**
- ix. **Ashchurch Railway Station**
- x. **New access from Fiddington to A46**

²⁰ Ibid, page 29.

Figure 4: Phase 1 of the Concept Masterplan

Phase 1 - to 2031

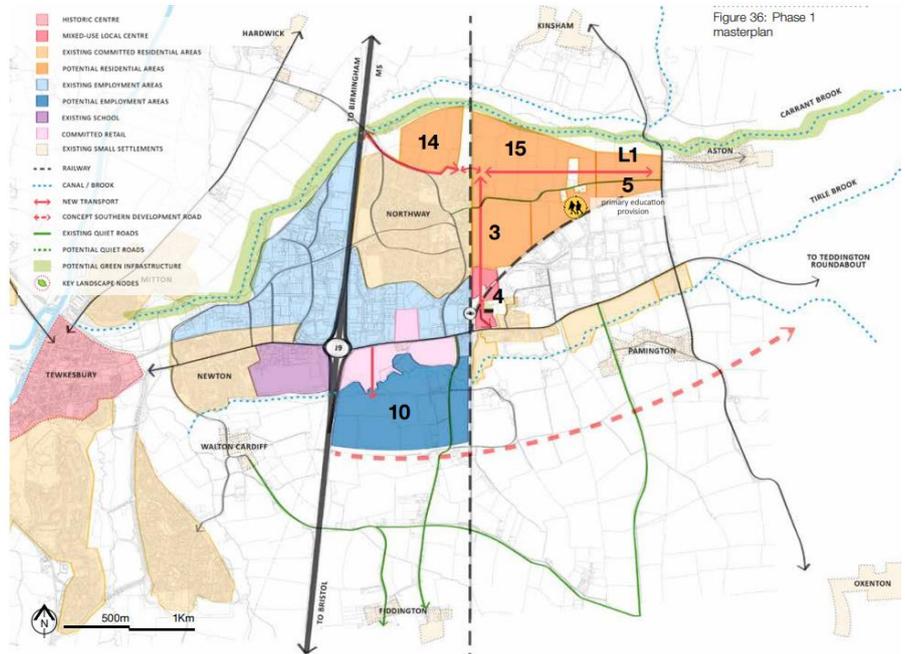
Phase 1 envisages the development of the areas north of the MOD base, the HCA land and the Fiddington site, delivering:

- 3,180 new homes
- 46 Ha new employment land
- local centre with retail/services
- new primary school
- northern Green Infrastructure corridor

PHASE 1		SITE AREA
		Ha
3	MOD Hitchens (Aston Fields Lane)	21.5
4	MoD HCA Land	6
5	Land east of MoD Hitchens	6.5
10	Fiddington	48
14	Land at Northway	22.5
15	Land north of Ashchurch depot	76
L1	additional land near Aston	10

In terms of transport:

- There is not a transport solution yet for this quantum of development in this phase. This is a gap in the current Concept Masterplan.
- All development loads onto current A46.
- Northern link needed with crossing over mainline rail, joining up existing roads.



28

Source: Concept Masterplan page 28.

39. The MOD land is envisaged to be released in Phase 2 adding 4,665 homes and 74 Ha of employment land plus a new primary school and additional community and green infrastructure. **This and subsequent phases are outside the NDP plan period and this will not be considered in the NDP.**
40. Phase 3 is envisaged to deliver a further 5,850 new homes and 74 ha of new employment land with a new primary school. This will impact upon Fiddington and Pamington communities.
41. Existing transport corridors of the M5 and the A46 are acknowledged to be insufficient to meet projected demand and an “offline” solution to the south is proposed.²¹ **There are currently no proposals to provide this relief road though it is included in Phase 1 and therefore of relevance to the NDP. There is however a “short term access strategy” .**

Although there is some evident benefit in enabling development access to specific land parcels in the short term through localised link and junction improvements, such measures will be of limited benefit, either in the near term or beyond in considering more ambitious development proposals. The prevailing issues of traffic demand, related vehicle delays and the limited road network connections available mean that more substantial and comprehensive road infrastructure improvement is required to support anticipated development. To minimise the related negative impacts of such infrastructure, severance, noise, visual impact etc, and to provide a more positive and active movement and living environment, then a related and comprehensive approach is required, predicated on sustainable transport.²²

At the highest level, the principal conclusion confirms the common understanding that the existing road network offers little in the way of further capacity for additional development. Therefore, this report recommends that to accommodate very substantial growth in the Ashchurch area, major development delivery road infrastructure and comprehensive sustainable living interventions will need to be brought forward with the minimum of delay.²³

42. The conclusion is that anticipated traffic congestion should be eased by greater use of walking and cycling.²⁴ Though it will be appropriate for the NDP to contain policies that encourage walking and cycling, public transport, and home working, etc.²⁵, it is highly doubtful whether these initiatives will have a significant impact upon anticipated traffic congestion arising from proposed development. **Therefore, Phase 1 delivery appears to require a level of transport infrastructure improvement that is unlikely to be delivered in the period to 2031.**
43. The concept masterplan identifies “landscape nodes” and other green infrastructure that should accompany the delivery. **These are issues that could conceivably be considered in the NDP.** The indicative approach is set out in **Figure 5.**

²¹ ibid, page 38.

²² ibid, page 39.

²³ ibid page 40.

²⁴ ibid, page 42.

²⁵ ibid, page 42, 43.

Figure 5: Concept Masterplan Landscape Strategy

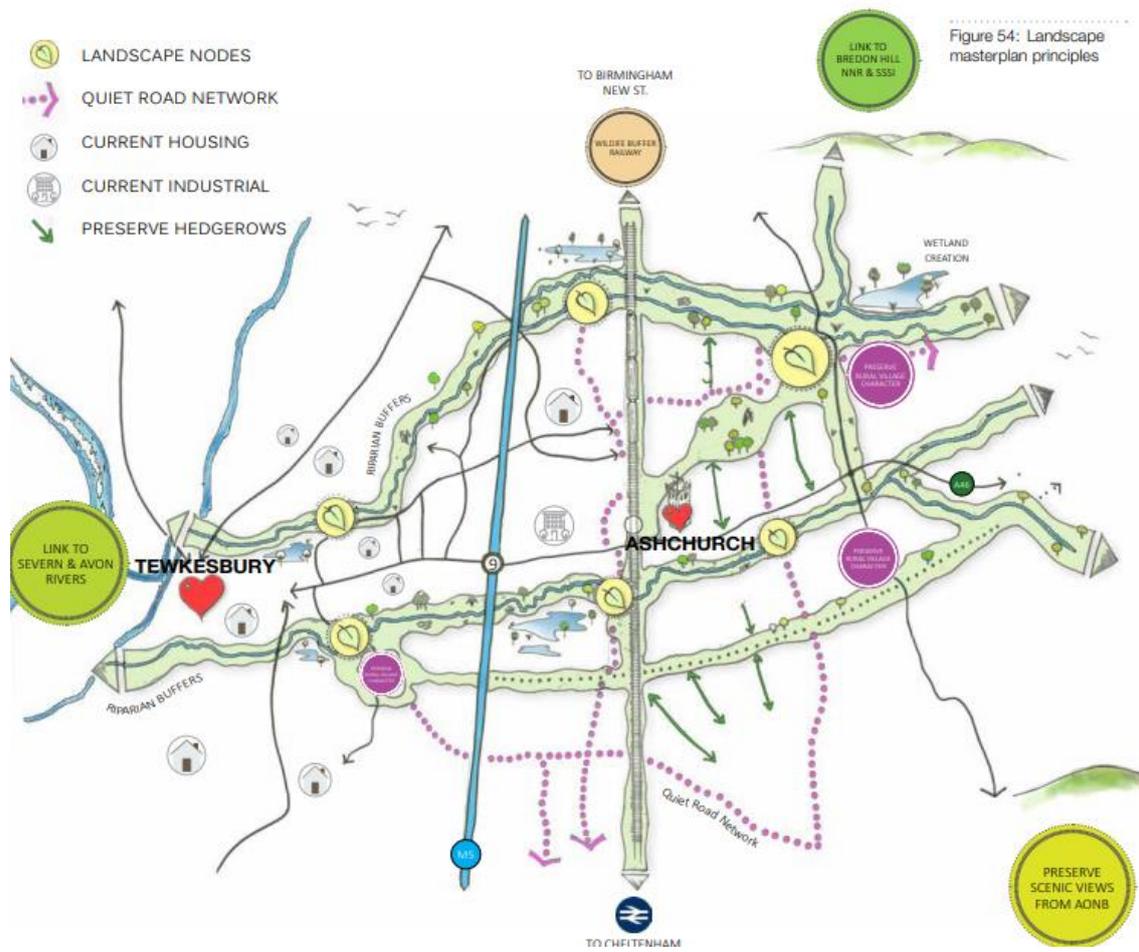


Figure 54: Landscape masterplan principles

Source: Concept Masterplan, page 48

Tewkesbury Borough Council Local Plan

Saved policies from the Tewkesbury Local Plan to 2011

44. The adopted Tewkesbury Local Plan to 2011 is now significantly out of date and no strategic policies have been retained. The saved policies were considered as part of the initial evidence gathering for the NDP in 2014/15 and the policies are discussed in the evidence prepared at that time which also considers community consultation responses.

Pre-Submission Tewkesbury Borough Plan 2011-2031 (October 2019).²⁶

45. The Joint Core Strategy identifies a housing shortfall for Tewkesbury Borough against its requirements. As such the Joint Core Strategy commits to an immediate review of Tewkesbury Borough's housing land supply to meet this. This review is to be focussed around the Tewkesbury town/Ashchurch area as the primary opportunity area for strategic scale growth.²⁷

46. The emerging plan goes on to state in para. 2.11:

The Borough Council commissioned a consultant team to undertake masterplanning work for the Ashchurch area to inform the immediate review and identify sites for further housing and employment growth. The area has also been awarded Garden Town status by the Government and will help to unlock and delivery growth in this location. As this work is ongoing the Tewkesbury Borough Plan does not identify any allocations in the Ashchurch area so as to not prejudice the outcome of this masterplanning and Garden Town work.

47. The Pre-Submission version of the Borough Plan includes all non-strategic scale sites within and adjacent to the Tewkesbury town area that are considered to be suitable options for allocation in accordance with the site selection criteria set out at the Housing Background Paper (HBP). This plan does not however include housing site options located at Ashchurch and Northway. Housing and employment growth within this wider area is to be planned strategically as part of an immediate review of the Joint Core Strategy. It is important that this plan does not prejudice the outcome of that strategic planning exercise which will allocate sites for housing and employment growth.²⁸

48. Emerging Local Plan policy RES4 seeks only small-scale residential development in rural areas such as Ashchurch. For the purposes of RES4, the planning authority proposes a definition of "built up area of the settlement" to be its continuous built form as it existed at the start of the plan period excluding groups of buildings that are "detached" from the settlement; gardens and other undeveloped land within a building's curtilage; agricultural buildings at the edge of the settlement; sports and formal open spaces.²⁹

49. EMP1 proposes an employment allocation in Ashchurch shown in Figure 6 for B-class uses.

²⁶ A revised tracked changes version of this is available and was used in support of the Local Plan Inquiry in early 2021. However for the purposes of this review, the changes were not substantial.

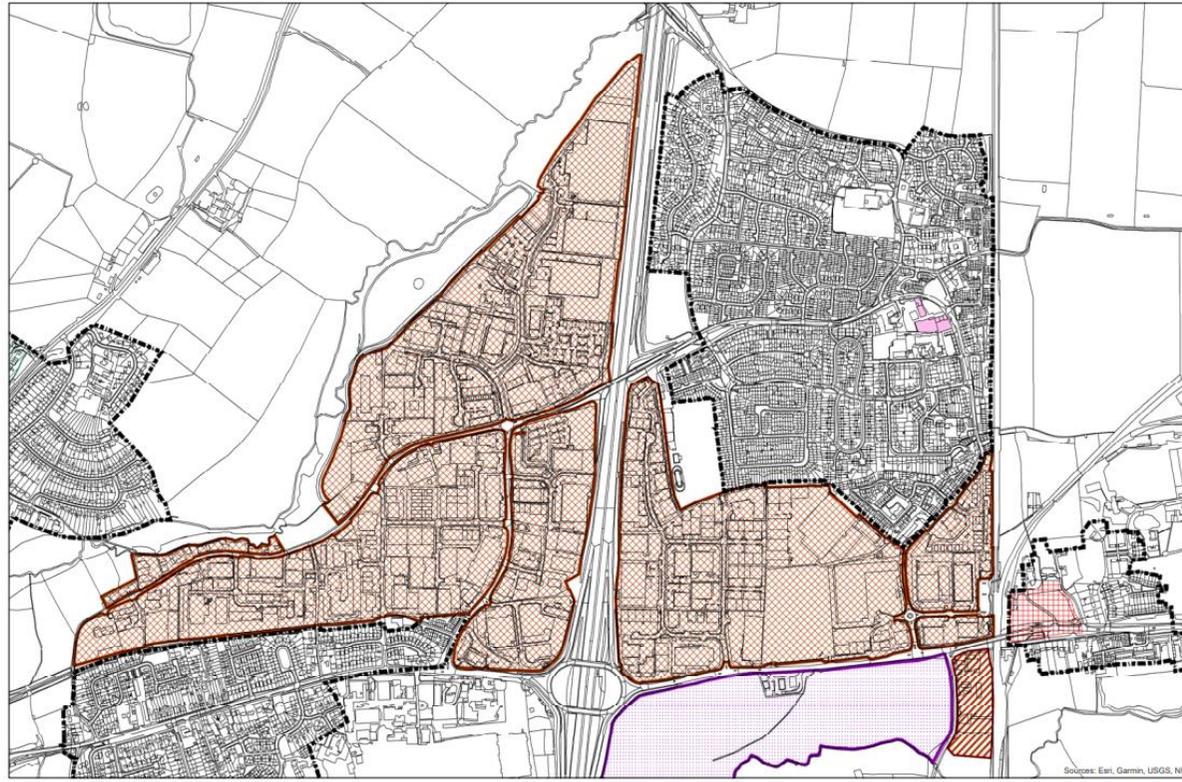
²⁷ Tewkesbury Borough Plan Pre-Submission consultation, October 2019, para 2.10.

²⁸ Ibid., para. 3.14.

²⁹ Ibid., para 3.32.

Figure 6: Tewkesbury and Ashchurch Business Parks proposed employment allocations

EMP1 - Tewkesbury & Ashchurch Business Parks



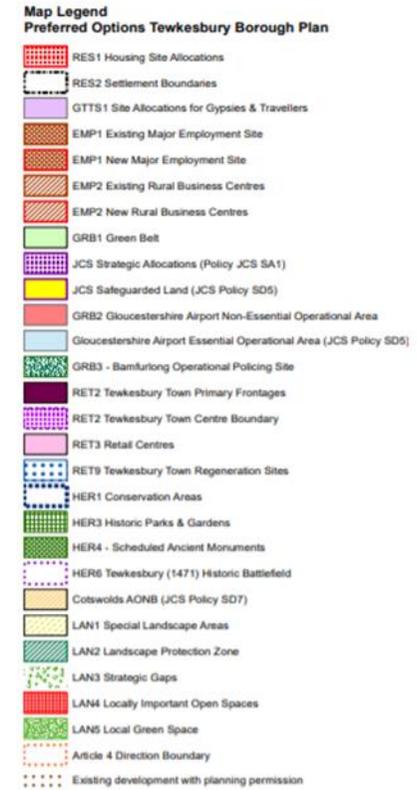
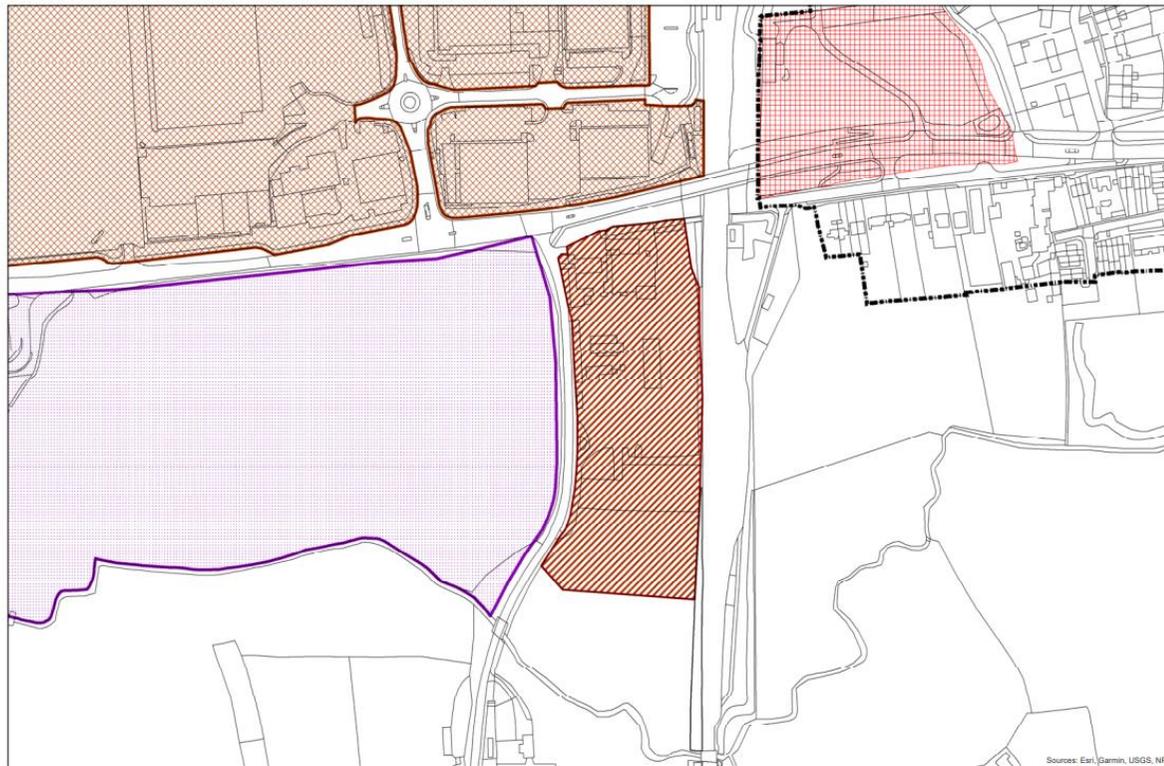
- Map Legend**
Preferred Options Tewkesbury Borough Plan
- RES1 Housing Site Allocations
 - RES2 Settlement Boundaries
 - GTT51 Site Allocations for Gypsies & Travellers
 - EMP1 Existing Major Employment Site
 - EMP1 New Major Employment Site
 - EMP2 Existing Rural Business Centres
 - EMP2 New Rural Business Centres
 - GRB1 Green Belt
 - JCS Strategic Allocations (Policy JCS SA1)
 - JCS Safeguarded Land (JCS Policy SD5)
 - GRB2 Gloucestershire Airport Non-Essential Operational Area
 - Gloucestershire Airport Essential Operational Area (JCS Policy SD5)
 - GRB3 - Bamfurlong Operational Policing Site
 - RET2 Tewkesbury Town Primary Frontages
 - RET2 Tewkesbury Town Centre Boundary
 - RET3 Retail Centres
 - RET9 Tewkesbury Town Regeneration Sites
 - HER1 Conservation Areas
 - HER3 Historic Parks & Gardens
 - HER4 - Scheduled Ancient Monuments
 - HER6 Tewkesbury (1471) Historic Battlefield
 - Cotswolds AONB (JCS Policy SD7)
 - LAN1 Special Landscape Areas
 - LAN2 Landscape Protection Zone
 - LAN3 Strategic Gaps
 - LAN4 Locally Important Open Spaces
 - LAN5 Local Green Space
 - Article 4 Direction Boundary
 - Existing development with planning permission

Source: Tewkesbury Borough Council, Employment Allocations Map for Pre-Submission Tewkesbury Borough Plan (October 2019)

50. EMP2 Rural Business Centres proposes a B-class employment allocation adjacent to the JCS employment allocation and across the A46 from the EMP1 allocation shown in **Figure 7**. This allocation is meant to comprise a range of smaller-scale business units but should not detract from the rural character of the surrounding area.

Figure 7: EMP2 – Homedowns Achievement Park (Ashchurch) proposed employment allocation

EMP2 - Homedowns Achievement Park (Ashchurch)



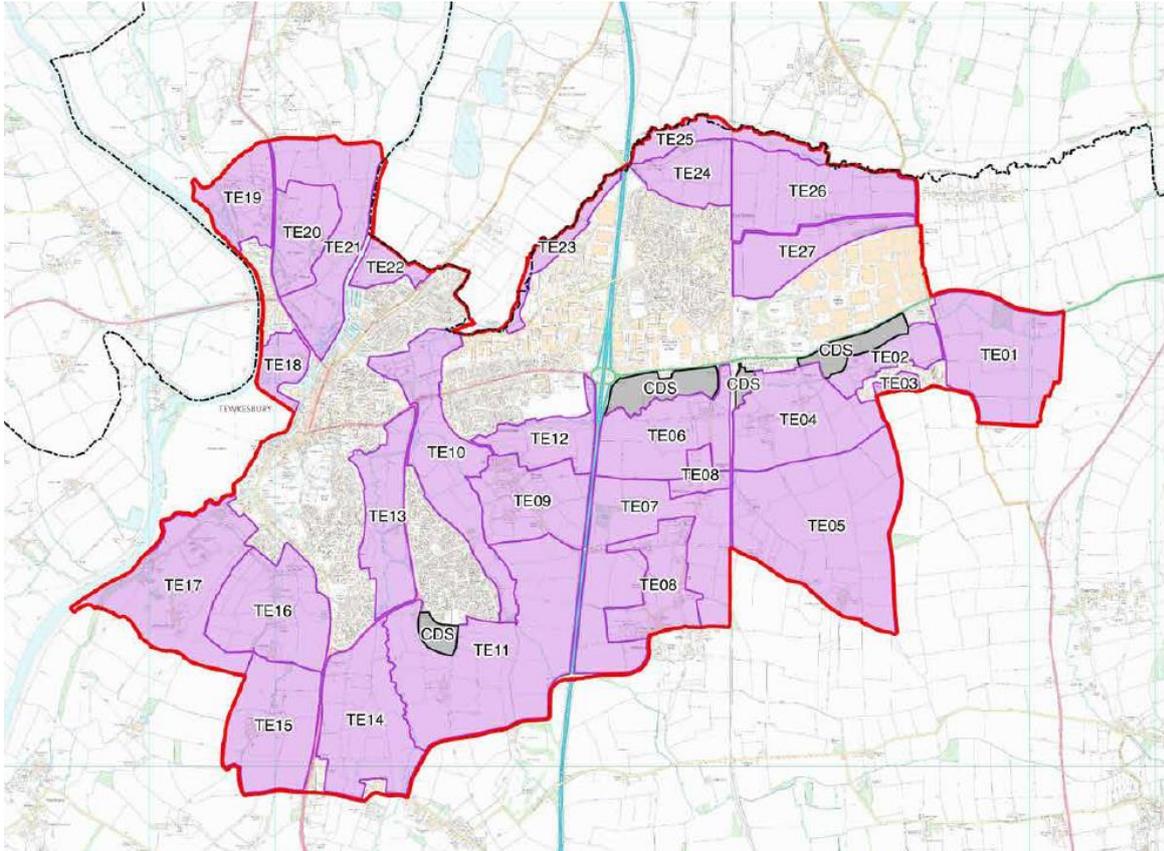
)

51. TRAC5 seeks to enhance the role and effectiveness of the Ashchurch for Tewkesbury Rail Station in recognition of the growth in Ashchurch predicted by the JCS.
52. TRAC6 M5 Junction 9/A46 corridor promotes major transport improvements at this key junction and route, located in Ashchurch Parish. New development must not prejudice the delivery of the proposed transport improvements. An “offline” solution to existing traffic congestion at the A46/M5 junction is being explored which would re-route the A46.

Landscape Sensitivity Study (LSS) for Tewkesbury and Ashchurch

- 53. The Landscape Sensitivity Study (LSS) for Tewkesbury and Ashchurch³⁰ was commissioned by TBC to assist in determining the most appropriate locations for future development to be identified in the emerging Local Plan.
- 54. The LSS spanned an area greater than AR Parish. The study considered its study area in terms of land parcels with similar characteristics. The map showing land parcels is replicated here in **Figure 8**.

Figure 8: Land parcels considered in the LSS



Source: LSS, page 16.

- 55. The LSS conclusions regarding land parcels in the Parish are set out in **Figure 9** below. The table shows where the recommendation that large scale development should be avoided in landscape terms, and the amber shows where there are significant development constraints that would affect a large proportion of the sites.

³⁰ Toby Jones Associates, April 2017.

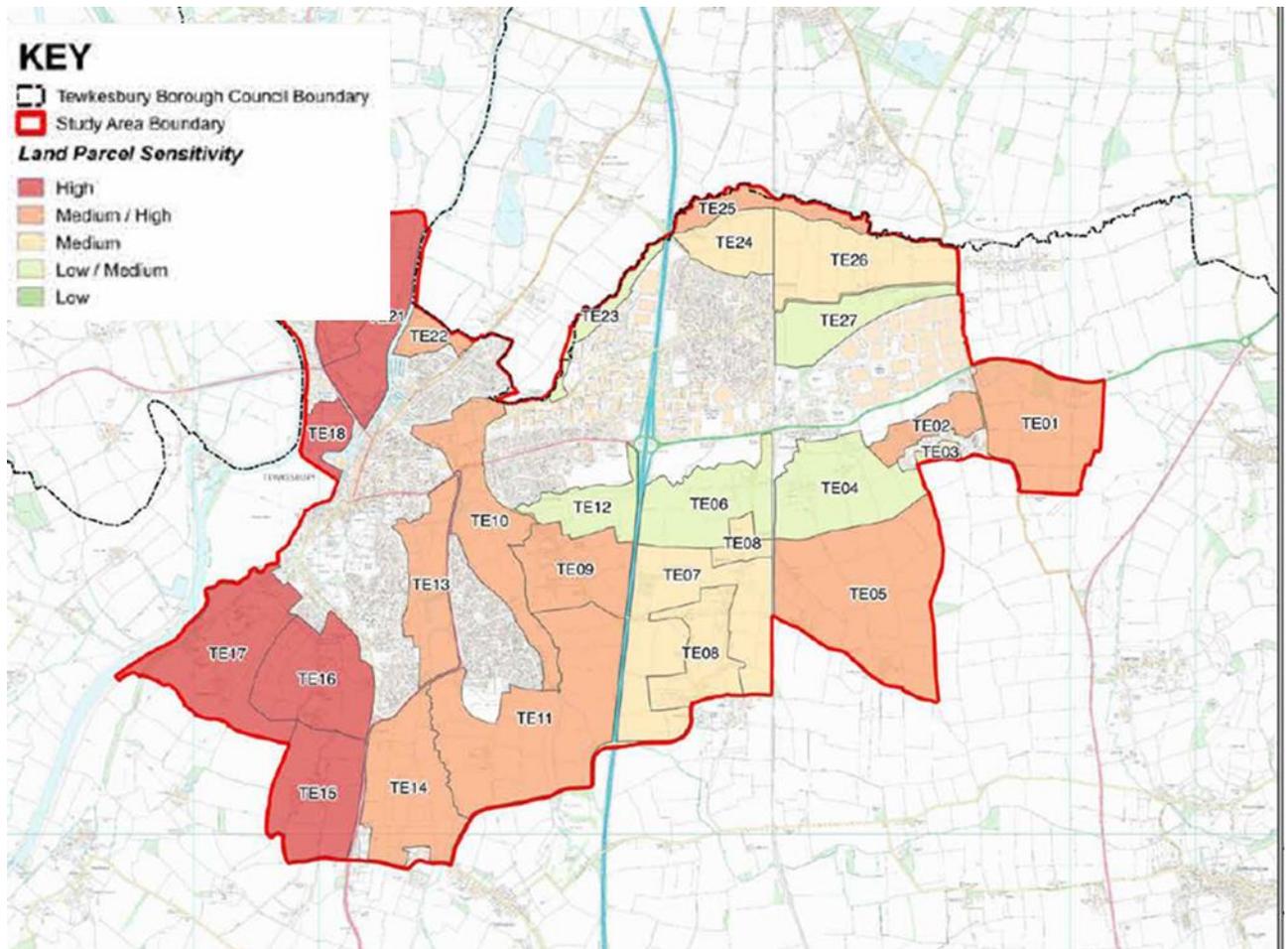
Figure 9: land parcels in Ashchurch Rural Parish and LSS recommendations (Red identifies land inappropriate for large scale development in terms of landscape sensitivity, Amber identifies land that is partially constrained)

Land Parcel number	LSS Recommendation
TE01	Medium to large scale residential development on this land parcel should be avoided.
TE02	Medium to large scale residential development on this land parcel should be avoided
TE03	Medium to large scale residential development on this land parcel should be avoided. If small scale development were to take place, care should be taken to preserve views from the lane out across the Vale to the south.
TE04	In landscape and visual terms, medium to large scale residential development could be accommodated in this land parcel. Any such development would need to avoid flood issues within the Tirlle Brook Corridor and would make a positive contribution to the proposed green corridor along the Brook. It would help to improve the quality of the southern settlement edge and would present a soft and articulated settlement edge (as opposed to a rigid and linear edge). Any such development would show restraint in terms of encroaching into the setting of Pamington and should retain Pamington as a clearly separate hamlet.
TE05	Medium to large scale residential development on this land parcel should be avoided.
TE06	In landscape and visual terms, medium to large scale residential development could be accommodated in this land parcel. Any such development would need to avoid flood issues within the Tirlle Brook Corridor and could make a positive contribution to the proposed green corridor along the Brook. It could help to improve the quality of the southern settlement edge and could present a soft and articulated settlement edge (as opposed to a rigid and linear edge). An appropriate buffer would need to be retained along the motorway for acoustic attenuation. Any such buffer could be effectively integrated into a local green infrastructure strategy.
TE07	In landscape and visual terms, medium scale residential development could be accommodated in this land parcel. An appropriate buffer would need to be retained along the motorway for acoustic attenuation. Any such buffer could be effectively integrated into a local green infrastructure strategy. Any development would need to be respectful of the existing dispersed settlement.
TE08	In landscape and visual terms, small to medium scale residential development could be accommodated in this land parcel. Any development would need to be respectful of the existing dispersed settlement but could take opportunities to locally improve the condition of the landscape in particular some degraded wayside plots. Additional restraint should be shown to the south where the setting and openness around Fiddington should be respected.
TE09	Medium to large scale residential development on this land parcel is not appropriate in terms of landscape sensitivity and

	should be avoided.
TE11	For the most part this land parcel is not suitable for residential development. However there are opportunities for some settlement rounding and expansion south of Wheatpieces although there is a clear sensitivity that if there is no restraint, such development might be perceived as a sinuous intrusion into open countryside. Any such development should deliver a soft and green edge to the south to act as a permanent and defensible settlement boundary.
TE12	The land parcel falls entirely within Flood Zone 3, which will ultimately dictate its unsuitability for residential development

56. In terms of landscape sensitivity, there are no sites with low sensitivity, a few sites (TE04, TE06 and TE12 with Low/Medium sensitivity and two sites with Medium sensitivity. This is shown in **Figure 10**

Figure 10: land parcel sensitivity for Residential development



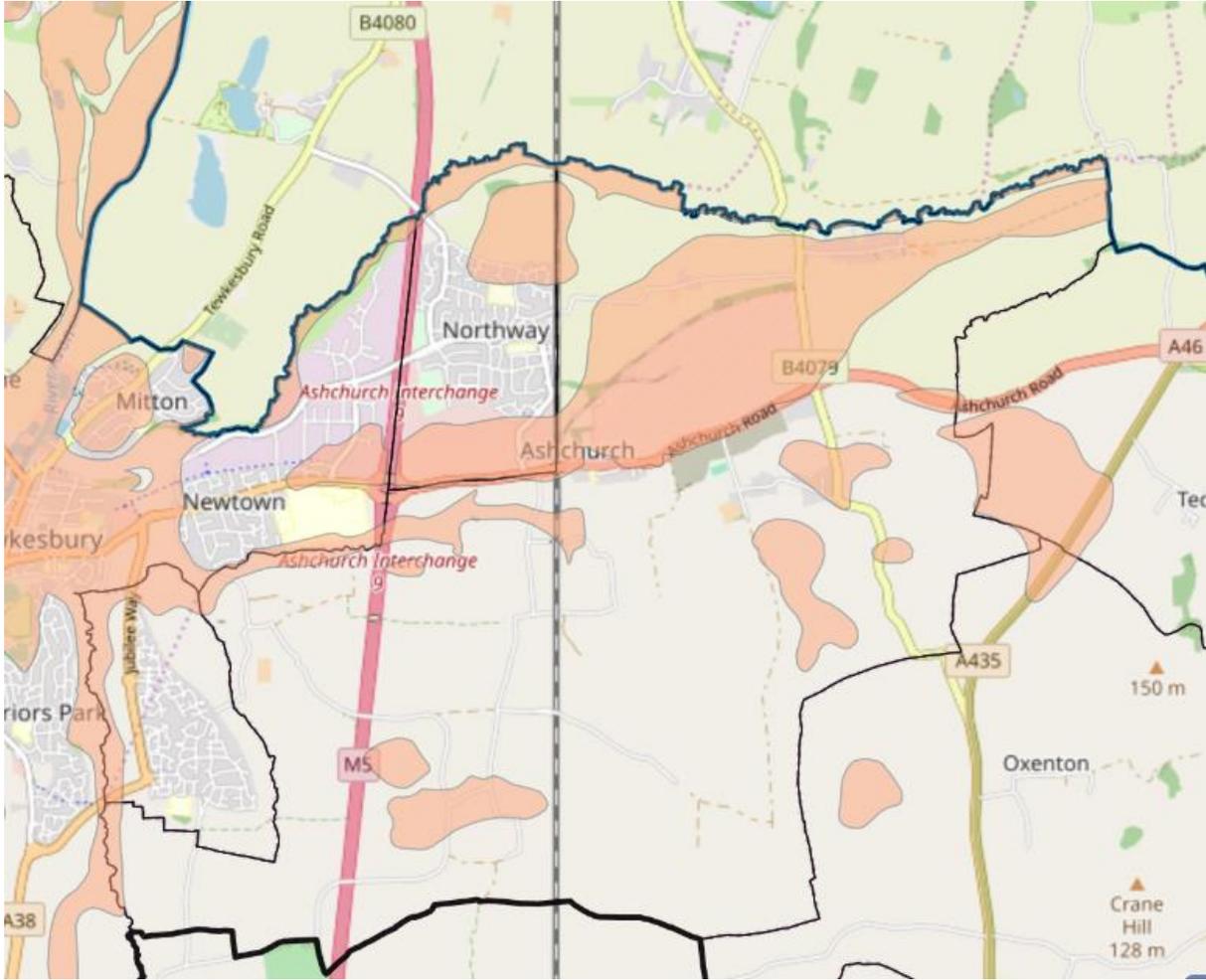
Source: LSS page 44

57. The LSS indicates that the Ashchurch Concept Masterplan proposals will lead to harm to a sensitive landscape.

Minerals Local Plan

58. Ashchurch Rural Parish contains some Minerals Resource Areas for Sand and Gravel as shown in Figure 11. However, no sand and gravel allocations were made under Policy A7.

Figure 11: Minerals Resource Area for Sand and Gravel (salmon shaded areas)



Source: Gloucestershire County Council interactive minerals and waste map

Waste Local Plan

59. No waste policies or designations apply in Ashchurch Rural Parish.

Housing Need Figure

60. NPPF para. 65 requires “Strategic policy-making authorities to establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.”
61. A request was made to Tewkesbury Borough Council requesting a housing need figure. This has proven complex given the evolving policy context described above. The response from the planning authority is replicated in the box below.

- **Joint Core Strategy (adopted)** – Para 3.2.17 JCS explains that Tewkesbury have an identified shortfall of 2,450 dwellings as a result of the MOD site falling out just prior to the adoption of the JCS. While this site cannot be released now, an immediate review of Tewkesbury’s housing supply is underway, so that further work on the development potential around Tewkesbury Town and the Ashchurch area can be carried out.
- **Emerging Local Plan** – The Borough Plan up to 2031 – Ashchurch is omitted from the emerging borough plan so not to prejudice the outcome of the Ashchurch Masterplan – see below. This plan will also be reviewed following the review of the JCS.
- **Ashchurch Masterplan** – 8010 dwellings
- **JCS review** – This uses the standard methodology for calculating housing figures. The Plan period is being extended to at least 2036, but may go beyond this.
- **Garden Town status** – This is specifically aimed at helping Tewkesbury Borough Council deliver up to 10,195 houses for Tewkesbury at Ashchurch over the period to 2041.

On a final note, it is a difficult position we are in, as there is no policy requirement for Ashchurch Rural Parish to deliver a set amount of growth – in that regard we cannot give you an indicative need figure. However, the JCS identifies a shortfall, up to 2031, of around 2,450 dwellings and we are looking at the Ashchurch area to deliver strategic growth to address this shortfall. This will be developed through the JCS Review, which includes the Ashchurch Masterplan and therefore the work is ongoing. The JCS Review will also likely extend beyond 2031 and the Masterplan/Garden Towns work looks well beyond the current plan period.

This is why it is so important we work together on this. We would strongly advise (sic) not including a housing figure in the NDP whilst so much is still unknown. It may be best to keep the NDP simple (easier said than done in this case, I appreciate). Our advice would be to recognise the Garden Town and Ashchurch Masterplan in the NDP, i.e. that strategic scale growth (of an exact quantum as yet to be determined), will be delivered in the area and just reflect the broader development principles in policies in the NDP.