

30 October 2017

Tel: 01242 602173

Mr Paul Skelton  
Tewkesbury Borough Council  
Council Offices,  
Gloucester Road  
Tewkesbury, Gloucestershire GL20 5TT

Dear Mr Skelton

**Application Reference 17/00924/OUT**

**Outline planning application for up to 500 dwellings; commercial/local centre and new informal and formal recreation space and means of access.  
Land South Of Up Hatherley Way, Chargrove Lane, Up Hatherley**

The Campaign to Protect Rural England (CPRE) objects most strongly to this speculative planning application for the reasons set out below

**The Site and its Surroundings**

This is a green field site lying just outside the well-defined urban boundary of Cheltenham in an important and highly sensitive part of the Gloucester-Cheltenham Green Belt. Protecting the Green Belt is set out in Section 9 of the NPPF. In this area the Green Belt exists for all five of the stated purposes, in particular to check unrestricted urban sprawl and to prevent neighbouring towns merging.

In an early draft of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy for 2011 – 2031 (the JCS) the area was proposed as a strategic urban extension to Cheltenham. However this was rejected following public consultation. The current situation regarding the JCS is covered below.

**The Planning Context – the Joint Core Strategy (JCS)**

The NPPF (para 2) makes it clear that applications for development must be determined in accordance with the development plan, unless material considerations indicate otherwise.

The only extant development plan is the Tewkesbury Borough Local Plan to 2011. Although now out of date, a number of Plan policies have been 'saved' pending a successor plan. These include policies relating to restricting development in the Green Belt and are consistent with the NPPF. The present site is not allocated for development in the Plan.

The emerging local plans comprise the JCS and a new Tewkesbury Local Plan, which is subordinate to it. The Tewkesbury Local Plan is still at a very early stage and can therefore be discounted. However JCS Main Modifications have been agreed by the constituent Authorities (including Tewkesbury Borough Council), the JCS has now completed its Examination in Public and, subject to a few final detailed amendments, is on course to come into force early in 2018. Hence, the JCS now attracts substantial weight.

The JCS specifies areas for removal from the Green Belt and strategic allocations for

development of 500 or more dwellings. The site of this application does not fall into either category. Hence its Green Belt status remains.

The JCS Inspector issued her Final Report on 26 October 2017 in which she found that, subject to the further small modifications noted above, the Strategy was both lawful and sound. The Report makes a number of key assertions relevant to the current application.

In particular, in her conclusions at Paragraph 279 the Inspector states:

*“..., it is in the public interest to have an adopted Plan in place as soon as possible to reduce continuing ad-hoc, unplanned development”.*

The current application constitutes just such an ad hoc, unplanned development.

### **Housing Land Supply**

Tewkesbury Borough is now able to demonstrate a five year housing land supply, as is made clear in the JCS Inspector's Final Report.

The matter of whether the housing requirements are soundly based and whether sufficient provision is made for the supply of housing is covered in paras 39 – 112. In particular, para 97 states

*“Gloucester can demonstrate at least 5.8 years of housing land supply, Cheltenham 6.00 years and Tewkesbury 5.3 years. However, by the time of adoption, it is estimated that Tewkesbury's supply will have risen to 6.3 years with a 20% buffer applied. Given Tewkesbury's strong delivery record to date during the early Plan period, this buffer could drop to 5% in the future, rendering the 5 years supply even greater.”*

This clearly demonstrates that there is no basis for the provision of the housing proposed in this application for lack of available housing land in Tewkesbury Borough.

Moreover, should any future shortage of land emerge during the Strategy period. the JCS has already identified areas of 'Safeguarded Land' to be removed from the Green Belt against future requirements. The present application is not within such areas.

### **Traffic Impact**

A scheme on the scale proposed would add significantly to levels of traffic in an area which has seen substantial growth over recent decades. There is already congestion on the A46 Shurdington Road, especially at peak times, and this will increase as a result of developments already under way and planned. The traffic movements that would result from a further 500 dwellings would greatly exacerbate what is already a problem. As well as the major effect on quality of life, including as a result of increase air pollution, there would be serious resultant damage to Cheltenham's economy.

### **Conclusion**

For all the reasons set out above, the proposals are unsubstantiated and unsustainable. We therefore request the Council to refuse this application.

Yours sincerely

Tom Hancock

Major Tom Hancock DL  
Chairman, CPRE Cheltenham, Gloucester and Tewkesbury District