



TEWKESBURY TOWN COUNCIL

PLANNING COMMITTEE

Wednesday 7th February 2024

To: Cllr. Joanne Raywood, Cllr. Simon Raywood, Cllr Alan Hayes, Cllr. Paul Jones, Mr Ryan Maggs and Mr Richard Carey

You are summoned to a meeting of the Planning Committee, to be held in the Court Room,
Tewkesbury Town Hall, on

Wednesday 7th February, at 6.00 pm.

Members of the public and press are welcome to attend.

Debbie Hill
Town Clerk
31st January 2024

AGENDA

- 1. Welcome.**
- 2. To receive apologies for absence**
- 3. To receive declarations of interest**
- 4. To receive and consider requests for dispensations**
- 5. To approve the minutes of the Planning Committee meeting held on 17th January 2024**
- 6. To receive updates on matters arising from the minutes – for information only**
- 7. To approve the payments list**
- 8. To receive the current budget and earmarked reserves report**
- 9. To consider a request from Friends of the Earth, to fund the purchase of two water testing kits and associated consumables, for use in testing the Carrant Brook.**

10. **To approve a response to the pre-application consultation on the Hinkley Point C Material Change 1 Application - Preliminary Environmental Information Report - Volume 3: Proposed Changes Off-Site**
11. **To agree a response to Tewkesbury Borough Council's Regulation 18 Strategic and Local Plan**
<https://strategiclocalplan.org/consultations/>
12. **To agree a submission to the Planning Inspector re:**

Residential Development (up to 165 dwellings), associated works, including infrastructure, open space, landscaping and pumping station. Construction of a new vehicular access from Mythe Road and demolition of existing structures.
Part Parcel 2352 Mythe Road Tewkesbury Gloucestershire
Ref. No: 22/00610/OUT
13. **Remove - 2 x Cypress Trees at front of building**
Planning Application
Sanctum Hall Barton Street Tewkesbury Gloucestershire GL20 5PX
Ref. No: 24/00043/TPO
14. **Proposed replacement front door, new signage and replace concrete blockwork within stallriser with traditional brick.**
Planning Application
67 Barton Street Tewkesbury Gloucestershire GL20 5PX
Ref. No: 23/01185/LBC
15. **Reinstate window in side elevation**
Planning Application
Flat 6 Barton Street Tewkesbury Gloucestershire GL20 5PP
Ref. No: 24/00011/LBC
16. **To receive the Borough Councillor's report (if applicable)**
17. **Public participation** *(to provide members of the public/press with the opportunity to comment on items on the agenda or raise items for future consideration. In accordance with Standing Orders this will not exceed 12 minutes in total and 3 minutes per person)*
18. **To note correspondence**
19. **To note any additional information on the Planning Portal regarding applications to which this committee has already responded, and agree further actions**
20. **To note any additional applications on the Planning Portal which will expire before Wednesday 28th February and agree further actions**



TEWKESBURY TOWN COUNCIL

PLANNING COMMITTEE

Wednesday 17th January 2024

Present: Cllrs. J Raywood, S Raywood, A Hayes, P Jones, E Ash, H Bowman, J Baddams

In attendance: Mrs N Finnegan (TTC finance officer)

Also: 2 members of the public

MINUTES

P.23/24.351 Welcome.

The Chairman welcomed everyone present when the meeting opened at 7.30 pm

P.23/24.352 To receive apologies for absence

None

P.23/24.353 To receive declarations of interest

Cllr S Raywood – Items 5, 11 and 12 - Employed by the Planning Inspectorate

P.23/24.354 To receive and consider requests for dispensations

Cllr S Raywood – item 5

(At this point Cllrs Bowman and Baddams, plus two members of the public joined the meeting.)

P.23/24.355 Public participation *(to provide members of the public/press with the opportunity to*

comment on items on the agenda or raise items for future consideration. In accordance with Standing Orders this will not exceed 12 minutes in total and 3 minutes per person)

None.

P.23/24.356 To approve the minutes of the Planning Committee meeting held on 3rd January 2024

Subject to correction of a typo in P.23/24.342 - should be 'east' not 'eats.'

Proposed by Cllr Hayes and seconded by Cllr Jones

It was resolved to **approve** the minutes.

P.23/24.357 To receive updates on matters arising from the minutes – for information only

Re. **P.22/23.392** – no further news available.

Re. **P.23/24.311** – The Deputy Town Clerk has suggested that if the Planning Committee wishes to support water testing on the Carrant Brook, in line with the

recommendation in the Hydrologist's report, it could consider funding two water testing kits for that purpose, at a cost of £480 for kits and consumables, as it is the cost of the kits that restricts expansion of the monitoring programme. We could fund this through either our Community Development budget or Outreach budget. We can include this on our next agenda.

Re **P.23/24.347**, a response has been received from a TBC Licensing Officer, thanking us for our comments, which arrived too late to be taken into account, and listing the following conditions which have been added to the licence:

- When regulated entertainment is provided, noise checks will be carried out at the nearest noise sensitive property. A noise check log of these checks will be kept and maintained at the premises. As a minimum the log will record the date and time of the check, the name of the person making the check, the sound level and if required, and action taken. The log will be made available to an authorised officer upon required.
- A complaints log will be maintained and any complaints from residents shall be recorded in it. As a minimum, the information recorded shall include: date and time of the complaints, name of complainant and any action taken thereafter in relation to it.
- Within 3 months of the issue of the license, the premises licence holder must draw up and implement a noise management plan (NMP) in relation to provision of live and recorded music at the premises. The NMP will include reference to the preventative measures that will be implemented at the premises to ensure that music at the premises does not cause a public nuisance. The NMP must be adhered to at all times. A copy of the NMP will be made available to officers from the Responsible Authorities on request and will be updated as necessary to ensure best practice.

The email also said that there is a process for the review of the licence, should the need arise.

P.23/24.358 To note correspondence

An email has been received from a TBC Planning Officer who has picked up the case in the absence of the allocated officer, in respect of 23/00505/FUL - 85 York Road. 'Having picked up the application, I reviewed it in its entirety and liaised with the Local Highway Authority in respect of the revised plans – and they confirmed a response of 'No Objection, subject to condition' (which I include, verbatim, as follows): ***“The existing vehicle hardstanding and access from Richard Place shall be retained for off-street vehicle parking and the western and southern boundary treatments shall be retained at a level no greater than 600mm high.”***

Although I appreciate that the Town Council upheld its objection, notwithstanding the revised plans, given the position of the highway authority it was considered that there was no substantive planning reason for refusal and as such, a decision has been made to permit the application (which should be formally published on the Council's website today).'

The Town Council last commented on this application on 13th December, while the condition imposed by County Highways did not appear on the Planning Portal until 10th January 2024. Clearly, this committee was correct to uphold its objection.

The Mayor, Deputy Mayor and Cllr J Raywood have received advance notice of an in-person briefing that the Strategic and Local Planning Team would like to convene for all town and parish councils across the area. The event will be an opportunity for officers to set out the background to the 'Regulation 18' consultation and to answer

any questions. They hope this will enable this council to fully engage in the public consultation and encourage others to do so.

The event will take place at 6.00pm on Wednesday 31 January 2024 in the Stoke Orchard Community Centre, Armstrong Road, Stoke Orchard GL52 7SB.

Cllr J Raywood has therefore requested that the next meeting of this Planning Committee should be moved from 31st January to 7th February and the meeting on 14th February be cancelled. A request for a 24 hour extension will be made, to enable this committee to respond on the 7th February, to the application on the Planning Portal that will expire on 6th February but cannot be addressed under item 18.

The GCC Local Highways manager has contacted Cllr J Raywood to arrange a meeting with the Accessibility Working Group, to discuss the impact of improved accessibility to the Town Hall, on the High Street and Back of Avon. This meeting is likely to take place in the first week of February.

We have been notified of a TBC recommendation to their own Planning Committee regarding 22/00610/OUT - Part Parcel 2352, Mythe Road, Tewkesbury. The recommendation is that the council should be minded to refuse. This is in the wake of the news that the Developer has lodged a non-determination appeal with the Planning Inspectorate. The application was for Residential Development (up to 235 dwellings), associated works, including infrastructure, open space and landscaping and pumping station. Construction of a new vehicular access from Mythe Road and demolition of existing structures. The Town Council objected strongly to this application in July 2022.

The Civic Society is currently setting up the next 6 monthly meeting with TBC enforcement officers, which Cllr J Raywood also attends.

P.23/24.359 To receive the Borough Councillor's report (if applicable)

Cllr H Bowman said there was nothing to report that wasn't already being addressed in our agenda. It is expected that Cllr Dimond-Brown will soon be able to resume his role as Borough Councillor reporting to this committee.

P.23/24.360 To retrospectively approve the Town Clerk's response, on behalf of this committee, to Licensing re. the review of the Licence for the Black Bear Public House.

(P.23/34.290, 15th November 2023)

Proposed by Cllr Hayes and seconded by Cllr Jones

It was resolved to **approve** the Town Clerk's response.

(Cllr S Raywood left the meeting at this point.)

P.23/24.361 To agree a response to the Tewkesbury Garden Communities Draft Charter

<https://tewkesbury.gov.uk/garden-communities/engagement-and-governance/engagement/>

Observations:

1. Did you have any problems reading or understanding the charter?

No

2. Recent engagement sessions highlighted the need to update the programme's vision (featured on page 6). Would you like to see anything added or changed in the existing vision?

Yes. The vision has a weakness relating to cultural areas.

3. Do the development principles include everything you would like to see from Garden Communities' development?

No. There is no mention of cemeteries, places of worship, medical centres, allotments, car clubs, provision for electric vehicles, libraries, reading rooms, community centres, banking facilities, local supermarkets, multi-generational living, 'tiny homes' for single people, places to stay, safe and welcoming night-time facilities.

There is no mention of sustainable transport links with other population centres, eg Bishops Cleeve.

Building in the garden communities should not only meet, but exceed, building standards.

4. Are there any other comments you would like to make on the charter?

The management of water and flooding should prioritise the use of natural methods over technical ones.

Is there an implication that there will be a new civic parish?

(Mrs N Finnegan left the meeting at this point.)

P.23/24.362 To prepare a draft response to the Tewkesbury Borough Council's Regulation 18 Strategic and Local Plan

<https://straQuestion5tegitlocalplan.org/consultations/>

There are 31 questions in this consultation document and within the meeting there was time only to address the first five.

In answer to question 1, the committee agreed that the Strategic and Local Plan should be a long-term document, covering the next 25 years.

In answer to question 2, the committee noted a lack of consideration of farming and the use of farmland.

In answer to question 3, the committee identified the following local policy topics as being unique to our parish:

- Water management
- Tourism
- The preservation of historic fabric
- Social hubs
- Nature reserves/SSSIs
- Rights of way

Question 4 – the committee agrees with the draft Vision.

Question 5 – the committee agrees with the draft Strategic Objectives.

This work will continue at the next meeting on 7th February.

In the meantime, our admin officer will be asked to create a poster for the Town Council website, which encourages members of the public to make their own responses to the Strategic and Local Plan, and also points towards the library as a place where hard copies of the documents can be seen.

(Cllr S Raywood returned to the meeting at this point. Cllrs Ash Baddams, and Bowman left the meeting, accompanied by the two members of the public.)

P.23/24.363 Remove rear staircase, handrail and partition wall, and reinstate first floor structure and two new doors

Planning Application

Tewkesbury Museum 64 Barton Street Tewkesbury Gloucestershire GL20 5PX

Ref. No: 23/01161/LBC

Observations:

As the Town Council is named as the applicant this committee refrains from commenting on this application.

P.23/24.364 New heating installation, new handrail to cellar stairs, new stair nosings, new extract fan, new attic access ladder

Planning Application

Tewkesbury Museum 64 Barton Street Tewkesbury Gloucestershire GL20 5PX

Ref. No: 23/01173/LBC

Observations:

As the Town Council is the applicant this committee refrains from commenting on this application.

P.23/24.365 Demolish existing conservatory and outbuilding. Construct single-storey extension, nominally 6m x 4m with side walls of brick, frontage of glazing with bi-folding doors and mono-pitch roof with Icoslate tiles.

Planning Application

4 Elmbury Drive Newtown Tewkesbury Gloucestershire GL20 8DQ

Ref. No: 23/01147/FUL

Observations:

No objection

P.23/24.366 Alterations and repair work to building fabric including floors, roofs and windows

Planning Application

Thomson And Banks 27 Church Street Tewkesbury Gloucestershire GL20 5PD

Ref. No: 23/01165/LBC

Observations:

No objection

P.23/24.367 To note any additional information on the Planning Portal regarding applications to which this committee has already responded, and agree further actions

None

P.23/24.368 To note any additional applications on the Planning Portal which will expire before Wednesday 17th January 2024 and agree further actions

None

P.23/24.369 To note the decisions made in December 2023, in respect of planning applications to Tewkesbury Borough Council

This item was added to the agenda in error, having been covered on 3rd January 2024.

There being no further business, the meeting closed at 9.26 pm.

Chairman's signature

7th February 2024

Detailed Income & Expenditure by Budget Heading 31/01/2024

Month No: 10

Committee Report

	Actual Year To Date	Current Annual Bud	Variance Annual Total	Committed Expenditure	Funds Available	Transfer to/from EMR
Planning						
400 Planning						
1130 Misc Income	3,356	0	(3,356)			
1600 CIL Income	2,252	0	(2,252)			
Planning :- Income	5,608	0	(5,608)			0
4718 Community Development Planning	0	1,000	1,000		1,000	
4719 Planning Consultancy	3,585	5,000	1,415		1,415	
4810 Outreach	0	500	500		500	
Planning :- Indirect Expenditure	3,585	6,500	2,915	0	2,915	0
Net Income over Expenditure	2,023	(6,500)	(8,523)			
Planning :- Income	5,608	0	(5,608)			
Expenditure	3,585	6,500	2,915	0	2,915	
Movement to/(from) Gen Reserve	2,023					
Grand Totals:- Income	5,608	0	(5,608)			
Expenditure	3,585	6,500	2,915	0	2,915	
Net Income over Expenditure	2,023	(6,500)	(8,523)			
Movement to/(from) Gen Reserve	2,023					

Earmarked Reserves

Account	Opening Balance	Net Transfers	Closing Balance
320 EMR B&M 64 BS Maintenance	20,264.00		20,264.00
321 EMR B&M Town Hall Gardens	250.00		250.00
322 EMR B&M Moorings Prior's Court	19,894.23		19,894.23
324 EMR E&A Noticeboards & Swapbox	1,708.00		1,708.00
325 EMR E&A Playground Projects	20,105.00		20,105.00
326 EMR E&A Youth	4,105.00		4,105.00
328 EMR B&M War Memorial	6,875.73		6,875.73
329 EMR SH Severn Ham	6,140.00		6,140.00
330 EMR E&A CCTV	2,500.00		2,500.00
331 EMR E&A Tree Maintenance	5,650.00		5,650.00
332 EMR E&A Street Furniture	3,050.00		3,050.00
333 EMR E&A Toilet Block Project	3,108.00		3,108.00
335 EMR E&A Bus Shelters	2,640.00		2,640.00
337 EMR FIN Website	2,160.00		2,160.00
338 EMR FIN Professional	5,237.00		5,237.00
339 EMR FIN Legal	14,087.00		14,087.00
340 EMR FIN Elections	4,000.00		4,000.00
341 EMR FIN Tourism & Marketing	1,474.00		1,474.00
342 EMR FIN Newsletter	1,500.00		1,500.00
343 EMR SH Weeding	10,000.00		10,000.00
344 EMR SH Severn Ham Tree Maint	8,000.00		8,000.00
345 EMR SH Hay Sowing Project	8,675.00		8,675.00
346 EMR SH Footpath Repairs	10,738.00	-7,485.00	3,253.00
347 EMR PLA Comm. & Display	1,306.00	-1,306.00	0.00
349 EMR B&M Moorings Projects	6,363.00		6,363.00
350 EMR B&M Watson Hall Lease *	20,000.00		20,000.00
351 EMR B&M Moorings St Mary's Rd	2,433.00		2,433.00
354 EMR B&M TH Maintenance	10,129.00		10,129.00
355 EMR B&M WH Projects	19,319.00		19,319.00
356 EMR B&M WH Bar Equipment	1,914.00		1,914.00
357 EMR B&M 64 BS Projects	11,219.00		11,219.00
358 EMR SH Mythe Nature Reserve	5,000.00	-5,000.00	0.00
359 EMR PLA Community Devel Planni	2,500.00		2,500.00
360 EMR B&M TH Projects	26,627.00		26,627.00
361 EMR FIN Community Grants	622.00		622.00
363 EMR B&M WH Maintenance	307.00		307.00
364 EMR B&M 64 BS Fundraising Proj	720.00		720.00
365 EMR FIN Events and Services	482.00		482.00
366 EMR B&M TH Equipment	870.00		870.00
367 EMR E&A Toilet Block Utilities	1,429.00		1,429.00
368 EMR E&A VAS Repairs	1,655.00	-1,655.00	0.00
369 EMR STA Training	2,087.00		2,087.00
	277,142.96	-15,446.00	261,696.96

Following the approval of Hinkley Point C's Development Consent Order in 2013 and the start of construction in 2016, refinements to the design of the nuclear power station and associated developments have resulted in a number of changes being approved. In the years since the original application, technology has advanced, whilst safer, more efficient methods of operating the power station have emerged.

As a result, we are proposing to apply for consent to make a number of more significant "material" changes.

This consultation is the beginning of the process. The application will eventually be decided by the Secretary of State for Energy Security and Net Zero.

Our consultation will run from 9 January to 23:59 on the 29 February 2024. Before we submit our application, we are seeking your views on our proposals. These will be considered before finalising and submitting the application to the Secretary of State.

We want to hear your thoughts on our proposals and welcome your feedback.

In particular, we would like your views on the following questions:

1. Do you have any comments on the removal of the requirement to install an Acoustic Fish Deterrent system? **No comment**

In our application we outline a number of compensation measures, which are designed to collectively offset any potential impacts by enhancing the structure and function of the estuary habitat.

In respect of our proposals for saltmarsh and associated habitats, we would like your views on:

2. a) Whether, in your view, the sites identified at Pawlett Hams and 'The Island' are likely to achieve our objectives. **No comment**

2. b) Whether there are any local issues or environmental impacts arising from our proposals that you would like to make us aware of. If so please let us know whether our proposals could be altered to reduce or eliminate those issues or impacts. **No comment**

2. c) Whether the proposed compulsory acquisition of land at Pawlett Hams, Maisemore Weir, Upper Lode Weir and the River Lugg Weirs has any impacts on you or your business. **Tewkesbury Town Council owns the Severn Ham, next to the Upper Lode Weir and the 1808 Severn Ham Act applies to this area.**

In respect of our marine options (Seagrass, Kelp and Oyster Beds) we would like your views on:

3. a) Whether you are aware of any areas of the Severn Estuary (or beyond) that would be suitable locations for these kinds of measures. **No comment**

3. b) Whether the list of potential benefits and impacts that we have set out in our documentation is correct and whether there are any other factors we should consider. **No comment**

In respect of our river barrier (weir) options we would like your views on:

4. a) Whether any of the options (presented in Section 6.5) are preferable and why?

With regard to the proposals for the Upper Lode Weir on the River Severn, we consider removal of the weir unacceptable. This has already been considered by the Environment Agency but rejected as a non-feasible option for the following reasons. The first is that consent is unlikely, due to heritage value of weir and subsequent effect on upstream and downstream river levels, including upstream weir at Diglis and flood risk. In addition, it does not meet the legal obligation to maintain navigation.

Further to this, the plans for the removal of the waste from the site using HGV's across the Severn Ham (a designated site of special scientific interest) is wholly unacceptable to the Town Council as the land owners of the site. The damage that would be caused would result in years of restoration work being undertaken.

However, the Town Council is not, in principle, opposed to the sensitive consideration of an improved fish pass and access.

4. b) Whether there are any other river sites not set out in the documentation where we could remove barriers or ease passage for migratory fish and achieve our objectives? **No comment**

4. c) Whether there are any local issues or environmental impacts arising from our proposals that you would like to make us aware of? If so please let us know whether our proposals could be altered to reduce or eliminate those issues or impacts. **See 4a.**

In respect of our proposals on-site at Hinkley Point C:

5. Do you have any comments on the change from a 'wet' Interim Spent Fuel Store to a 'dry' Interim Spent Fuel Store, including the resulting change to the building's dimensions? **No comment**

6. In relation to the proposed changes to the Interim Spent Fuel Store, do you have any comments on the replacement of the proposed Access Control Building with a new Equipment Storage Building? **No comment**

7. Do you have any comments on the relocation and redesign of the Meteorological Mast, and removal of the Meteorological Station and replacement with an equipment compound co-located with the mast? **No comment**

8. Do you have any comments on the introduction of the Sluice Gate Storage Structures? **No comment**

9. Do you have any comments on the retention of the existing temporary substation as a permanent feature in order to supply electricity to neighbouring Hinkley Point A and Hinkley Point B power stations during their decommissioning processes? **No comment**

10. Do you consider yourself to be affected by the proposals either positively or negatively, in any way? **Any removal of waste due to the removal of the weir at Upper Lode would negatively impact the Severn Ham as a Site of Special Scientific Interest.**

11. We outline potential environmental effects, our evidence base, the methodology and proposed approach to further and more detailed assessment in the Preliminary Environmental Information Report and the Shadow HRA Evidence Report – pre-application consultation version. Do you wish to make any comments on what is set out? **The report has ignored the impact of HGV's travelling across a Site of Special Scientific Interest and the restoration efforts that would be required subsequently, if this was to take place.**

Site accessibility – Access between the site and M50 is via the Mythe Bridge, which has a weight restriction and cannot be used by HGVs. Access between the site and the A438 is via Tewkesbury

Town Centre, which is also weight-restricted. It is also a conservation area with many fine old buildings. HGVs would have to negotiate The Cross, around an acute corner on a roundabout that has a listed war memorial in the centre of it. Although the report says that concentrations of HGVs in the town are low (5%), that is to be expected in the circumstances. However, the road network in the town is operating at close to capacity and each additional HGV will cause additional congestion and air pollution.

With regard to the management of excavated materials and their removal from site, the applicant should refer to the recent works on the Severn Ham, carried out by Severn Trent Water, Dalcour McLaren and Geda, to understand the complexity of the appropriate processes that are required to protect the Severn Ham SSSI from damage, both short term and long term.

12. Are there any additional measures or opportunities which you would like incorporated into our proposals that could further minimise the impact of the scheme or enhance the beneficial effects on the environment or local community? **No comment**

13. Do you have any further comments or suggestions regarding the information presented in this consultation?

The potential impacts on wildlife have not been considered. Every year, there are ground-nesting birds on the adjacent Severn Ham SSSI, some of which are of endangered species (curlew).

The twait shad or mayfish, is a migratory fish that swims up the River Severn in the late springtime, to spawn in the gravel and then returns back out to sea. The removal of the weir may provide easier access to a longer stretch of the River Severn for them, but they still have to swim past Hinkley Point twice a year. Has the Severn River Trust been consulted on the potential impact on the twait shad? <https://www.severnrivertrust.com/>

The Upper Lode lock and weir were constructed to improve the navigation of the River Severn, so that larger boats could access quaysides further upstream. Has any modelling work been carried out to determine the effect of the removal of the weir on the nearby lock, or on local river levels? The rivers at Tewkesbury contribute to the local tourist economy with the passing and stopping of leisure boats. From the River Severn it is possible to access the Upper River Avon, via the old Avon, the pound lock and the Mill Avon. Has the Avon Navigation Trust been consulted on this?

Tewkesbury lies within the Severn Valley flood plain, which only recently was inundated, at a cost of damage to local properties and businesses. Has any modelling been carried out to ascertain the potential impact of the removal of the Upper Lode weir on flood levels?

The weir is not located on the natural channel bed. The Upper Lode weir and lock took out an extreme meander of the River Severn, which is now an ox bow lake and SSSI. Construction of the lock and weir was not straightforward, due to the ground conditions, as described in engineer Edward Leader Williams's paper for the Civil Engineers' and Architects' Journal, April 24, 1860. Has any modelling been carried out to assess the potential impact that removal of the weir will have on the width of the river and the level of the surrounding land?

Without testing, there can be no certainty that the river bank immediately to the east of the weir is not contaminated land. Following the cutting of the new river channels and the building of the weir the excavated material was piled up on this bank and turned into bricks on this site. This was essentially an industrial site from the 1860s until the 1880s. After that, the resulting clay pits became withy beds which, during the 20th century, became a landfill site, according to contemporary reports in the Tewkesbury Register and Agricultural Gazette.

There are rights of common over the Severn Ham, as upheld by 48 Geo. III 1808 - An act for inclosing lands in the Borough and Parish of Tewkesbury in the County of Gloucester and for vesting the after or latter math of a meadow called Severn Ham, within the said Borough and Parish, in trustees for certain purposes:

<https://www.legislation.gov.uk/ukla/Geo3/48/153/contents/enacted>

Strategic and Local Plan - Summary of questions and responses

Please note that, due to time constraints, we need to come to the Planning Committee meeting armed with proposed responses/amendments to what is written below. There won't be time to read through the consultation document together. All responses in red have already been agreed by the Planning Committee but can be amended further. All responses in blue are suggestions by JR and should be challenged.

Strategic and Local Plan

1. The SPL covers a minimum of 15 years, how far into the future should the Strategic and Local Plan cover?

The Strategic and Local Plan should be a long-term document, covering the next 25 years.

2. Are there any strategic policy topics, not identified above (paragraph 2.4), which should also be considered?

The policy topics lack a consideration of farming and the use of farmland.

3. What local policy topics are unique to only a council area, neighbourhood or community?

The following local policy topics are unique to our parish:

- Water management
- Tourism
- The preservation of historic fabric
- Social hubs
- Nature reserves/SSSIs
- Rights of way

Draft Vision and Strategic Objectives

4. Do you agree with the draft Vision?

Yes

- a. If not, what changes would you like to see?

N/A

5. Do you agree with the draft Strategic Objectives?

Yes

- a. If not, what changes would you like to see?

N/A

Planning for climate change and nature recovery

6. In what ways do you consider the Strategic and Local Plan can most effectively address the impacts of climate change?

While not discouraging development, the local plan should set a high bar for water management on sites that might be developed for housing; not just on allocated sites, but on sites that come forward during the

plan period. This should include finance to ensure that organisations appointed to manage SUDs cannot fail, measures to effect a reduction in the threat of flooding in vulnerable downstream neighbourhoods, improvements to infrastructure so that sewers cannot become overwhelmed and roads so choked with traffic that cars stand idling, and proper provision for sustainable modes of transport.

There should be an encouragement for owners of listed buildings to embrace low carbon sources of energy, with perhaps a scheme similar to the HAZ, to enable the installation of heat pumps, double-or-secondary glazing, photovoltaic roof slates and solar panels.

The design of roads and parking strategies should aim to create a more cycle-friendly environment and also a more pedestrian-friendly environment.

There should be a requirement for new and converted homes to have access to an EV charging point. There should be a requirement for new industrial and commercial properties to contain a proportion of EV charging points.

Community spaces could include drop-off hubs for the delivery of internet and mail-order purchases, from which people can choose to collect goods.

There should be greater access to E-bikes throughout our communities.

The cycling network between communities needs to be strengthened and made safer.

7. What measures and standards should the Strategic and Local Plan introduce in respect of the:

a. Construction and operation of new buildings?

Encourage developers to aim for zero carbon, in both the development stage and in the running of new buildings.

Encourage the use of reclaimed materials where practicable.

Encourage groups of self-builders to work together to source supplies of materials and renewable energy.

b. Retention and reuse of existing buildings?

Redevelopment of brownfield sites must be encouraged above the use of, say, greenbelt land. Perhaps such sites could be used for modern farming methods, such as hydroponics. Perhaps the development of key brownfield sites could be linked to the development of greenfield sites, so that the relative expense of developing the former can be partially offset by the opportunity to develop the latter. Planning authorities could carry out a 'de-risking' strategy for stubbornly undeveloped brownfield sites (as with Healings Mill).

8. Should the Strategic and Local Plan require more than the mandatory minimum 10% Biodiversity Net Gain through development?

Yes. 10% can be relatively easy to gain, particularly if the land, watercourses, trees and hedges have not been well cared-for for some years previously. The level needs to be set at a point which requires a real effort on the part of the developer, to attain a level that is at least 10% above what can be evidenced to have been on the site, during the history of the site. Local people can be encouraged to keep records of biodiversity in their areas.

9. Are you aware of any land that could be identified for environmental purposes, such as wildlife /biodiversity net gain, recreation, flood risk mitigation, cooling and shading, carbon storage and food production?

?

10. Which key services and facilities do you think are most important to be provided within easy reach of developments?

Medical and dental services, schools, general stores, banking facilities, sporting facilities, community halls, play spaces, high speed broadband, places of worship, places for burials and interment of ashes etc

11. Should we allocate sites in the SLP specifically for renewable energy generation or storage?

Yes

a. If so, what forms of renewable energy would be appropriate and in which locations?

Ground source heat pumps at central locations in new housing developments and also in rural areas. Solar panels, pv slates and air source heat pumps in already developed areas. Hydro-electric turbines watercourses.

Planning for new homes and businesses

New Homes

12. Should the Strategic and Local Plan use the local annual housing need calculation from the Standard Method?

No

a. If no, please set out what you consider the councils should use instead.

The number derived from the local annual housing need calculation needs to be reduced, to take account of the following factors:

- The proportion of the total plan area that cannot be developed because it is in a flood plain
- The proportion of the total plan area where development is restricted because it is in an AONB
- The proportion of the total plan area that has special characteristics, eg a particular historical environment, that would be harmed by the close proximity of modern development.
- The proportion of the total plan area that is protected by SSSI or listed Ancient Monument status
- The proportion of the total plan area that needs to be allocated to major infrastructure, eg roads

13. Are there any constraints or other reasons why the number of houses to be actually planned for in the Strategic and Local Plan should differ from calculated needs?

Yes. Due to the densely developed nature of Cheltenham and Gloucester, there is a pressure to bring forward sites in areas that are also very much subject to the pressures described in 12a.

14. Are there any specific types, sizes or tenures of housing that the SLP should require for particular groups in the community?

Yes

a. If so, please explain further.

Given the relatively elderly demographic of the northern part of the plan area, there needs to be housing that is suitable for retired people, and is also designed to be easily adaptable for their changing needs, so that they can live independently for longer. There needs to be accommodation for growing families, that again can adapt to their needs as they grow older. There needs to be suitable and affordable accommodation for young people, close to the facilities that enable them to socialise and lead healthy lives, without having to leave the area.

Traveller Communities

15. Should sites for traveller communities be provided as part of large developments for housing and/or employment?

?

16. Are there any other ways that sites for traveller communities could be met in our area?

?

17. What site characteristics and locations would be most suitable for different traveller communities?

?

Jobs and the economy

18. What economic and regeneration needs should the Strategic and Local Plan address in supporting businesses to invest, expand and adapt?

Where possible, economic development should be focused on existing centres in order to help them to remain, or become more, vibrant. Empty sites in town and city centres need to be given new economic uses. Local planning authorities should encourage 'in-the-meantime' uses for some town centre sites, perhaps for the erection of temporary start-up business premises and/or entertainment/leisure venues, so that there is still footfall in those areas, until more permanent premises can be found.

19. How should the Strategic and Local Plan best seek to accommodate employment needs and provide an environment that is attractive to inward investment?

The Strategic and Local Plan could identify the types of businesses that work well in close proximity to each other and encourage them to locate in premises near to each other. A fast broadband connection throughout all urban and rural areas is vital to ensure good connectivity and thus allow businesses to flourish. Some businesses don't need huge physical movements of goods, and these should be encouraged in areas where the road network is less robust, and areas which can be cut off due to floods.

20. How should the Strategic and Local Plan support and encourage rural employment?

There are modern types of farming and market gardening methods that don't require huge tracts of land and these may be more manageable for young people who haven't actually inherited a farm. Strong internet connections will enable businesses that don't rely on extensive sewerage networks to flourish in rural areas. Access to renewable energy will also be beneficial.

Retail and town centres

21. How could the Strategic and Local Plan best enable change and encourage investment to support our city and town centres to adapt, evolve and thrive?

The Strategic and Local Plan could incentivise modifications to existing buildings in order to make them more accessible and also more energy efficient. It can also incentivise the repurposing of existing structures and sites for new businesses and accommodation.

22. How can the Strategic and Local Plan protect and encourage essential shops, services and facilities in villages and rural areas?

It can help to encourage banks/post offices to maintain a presence. It can encourage the provision of sustainable transport options and provide well-lit, well-overlooked, safe pedestrian routes, that will make it more possible for residents to use those facilities without having to get into a car.

Infrastructure

23. What types of infrastructure do you consider are most critical to be delivered alongside new development?
A sewerage system that is fit for the 21st Century, strongly managed SUDs, roads, strong internet and mobile phone connectivity, schools, health facilities.
24. Given their size, if strategic scale new settlements were to form a part of the Strategic and Local Plan, what accompanying infrastructure would be necessary?
Good links to existing settlements, additional infrastructure provision, so as not to disadvantage users of existing provisions.
25. What key services and facilities do you consider most important in deciding if a rural settlement is a suitable location for new homes and other forms of development?
Would it be possible to live a fulfilling life here and not have ready access to a car? There needs to be a community hub, shop, local jobs, open space, play areas, safe and sustainable access to other communities and a fast broadband connection.
26. Should the Strategic and Local Plan safeguard sites or routes for longer term infrastructure projects?

Yes

Planning for sustainable development

27. Are there any additional development scenarios that should be considered?
?
- a. If yes, please describe what they are.
28. Are the pros and cons identified for the six development scenarios a fair and accurate assessment?
Yes
- a. If not, which one(s) and what are your reasons?
29. Which of the development scenarios, or combination of them, do you consider the most appropriate for the Strategic and Local Plan?
A combination of scenarios would be the most appropriate.
30. Are there any places not currently identified in the rural settlement hierarchy, which could/should be included?
?

Conclusions and Next Steps

31. Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

Accommodation needs to be made in the plan for residents who will pass away. As our population increases, so will our need for cemeteries and memorial spaces. There needs to be a range of different options, from the reuse of existing plots of a certain age, to the establishment of woodland cemeteries. We must be mindful that, within the Severn Valley, opportunities to accommodate such sites within easy access of communities is limited by the height of the water table and we should take care not to allow housing for the living to take all the high ground.

We could learn from Dutch experiments with amphibious homes and offices – ones that can rise above the water in times of flood and those that don't rise but can cope in flood conditions. The Dutch are even now creating such homes in heavily developed areas and areas with a high quality historical environment.

**Application Number: 22/00610/OUT Address: Land East Of Mythe Road, Tewkesbury
Proposal: Residential Development (up to 165 dwellings), associated works, including
infrastructure, open space, landscaping and pumping station. Construction of a new
vehicular access from Mythe Road and demolition of existing structures.**

The following response was approved by the Full Council on 11th July 2022.

Objection, on the grounds that there is insufficient information to enable the Town Council to reach a conclusion.

The applicant has suggested that the SUDS and open spaces could either be managed by a management company or adopted by the local authority. The Town Council is concerned that, unless they are adopted by the local authority, there could be difficulties in ensuring clarity of responsibility in the future. It is really important to us to be assured of the appropriate ongoing maintenance of the SUDS in particular, to ensure that properties downhill and downstream of this development are protected from the possibility of flooding due to development on this site.

One of the strategies for the management of surface water offered by the applicant is the use of permeable surfaces in the gardens. Unless it can be conditioned that subsequent developments in and modifications to those gardens, (for example, the laying down of paving and sealed surfaces,) do not adversely affect permeability, then this is not a realistic strategy at all.

The Town Council would encourage the adoption of the recreational facilities by a local authority.

With regard to the Landscape and Visual Impact Assessment, the Town Council concurs with the recommendations of the Conservation officer.

The energy plan lacks sufficient strategies for the reduction of energy use and carbon emissions. Tewkesbury Borough Council has recently declared a climate and nature emergency, to include the whole borough. The Town Council would therefore expect the developer to make a commitment to, for example, the provision of electric car charging points, the incorporation of solar panels, the use of heat pumps, or grey water recycling.

The Town Council appreciates the reduction in houses and increase in the number of trees shown in the amended masterplan, which it hopes will lead to an increase in biodiversity over the site and surrounding fields.

Can the applicant advise how they have responded to recommendations made by the arboriculturalist?

We cannot find, within any of the documents provided, any consideration of the Mythe Railway Nature Reserve, which is very close to the site. Consideration must be given to whether or not this proposed development will have an impact on the wildlife within the nature reserve.

The Town Council would like confirmation that these plans are developed in accordance with the latest Borough Plan. The Town Council is concerned that the location of this site will encourage suburban sprawl to the north of the town that would overwhelm the identity of Tewkesbury as a small market town with a built environment that is rich in historical heritage.

The Town Council still has a question regarding how much of this travel plan is based on data specific to Tewkesbury and how much to another town altogether.

The proposed strategies to encourage active and sustainable travel are not obligatory on householders so cannot be cited as a strategy. In any case even if, initially, householders opt for active and/or sustainable transport, they are not obliged to encourage the same in future buyers of their property. However, the options for householders to manage without recourse to a car are so small in this location as to be almost negligible for most people. We note that the applicant has acknowledged that there is no bus service for this site, and that the County Council has indicated the unlikelihood of there being one.

This application is for 165 houses but we do not know how big the houses will be and therefore we do not know how many car owners they will accommodate. Therefore, there is insufficient reliable data on which to base a robust transport assessment.

There is already an issue with air quality where Mythe Road meets Bredon Road and the top end of the High Street. Traffic from this development is highly likely to exacerbate that, and indeed the Transport Assessment acknowledges that there will be increased queuing on the approaches to the Black Bear mini roundabout. There is already significant queuing here during peak times. We don't recognise the numbers for queuing at the Black Bear roundabout, as given in the Transport Assessments, as they don't match our own experiences of what already happens there. This is probably due to the fact that traffic flows were still abnormally light when the surveys were done, as many people were still working from home, following the Covid pandemic.

The Transport Assessment suggests that there is plenty of provision for active modes of transport such as cycling and walking. This is simply not the case. The assessment does not seem to take account of the local terrain, the rivers and the floodplain. While there are a lot of footpaths located near the site, most of them lead away from local services and many of them are not accessible. Some of them are impassable during floods and no walking or cycling routes into town can avoid the A38 Mythe Road/A38 High Street/B4080 Bredon Road mini roundabout. This roundabout cannot easily and safely be negotiated by walkers and cyclists, particularly schoolchildren and there is no nearby pedestrian crossing. The proposed development is half-way up a hill; in places there is a footpath on one side of the road only and the speed limit is 40mph at the entrance to the site. On the downhill side of the road, motorists will only just have reduced their speed from 50mph. The comments made in the response to GCC do not convey the reality of what the A38 is like on a normal day, let alone on occasions when it is being used as a relief road.

We note that GCC has advised that the applicant's cycling plan is not plausible. We have concerns that the proposed traffic calming measures will have a minimal positive impact. Ascending the hill to the site will be a challenge to many cyclists, people carrying shopping, very young, elderly, or disabled walkers, parents/grandparents pushing prams and pushchairs and also to users of mobility scooters.

A safe crossing to the western side of the Mythe Road is a necessity, in order to create safe sustainable access to the Garden Centre and the Mythe Railway Nature Reserve. This development is likely to make the Mythe Road busier and visibility is already not good for people turning into the road from the garden centre. Just down the hill from the site, the Ledbury junction is known to local people as an accident black spot.

According to the transport assessment, the MSOA data indicates that 8% of commuters cycle in Tewkesbury. This does not take into account the fact that the terrain in the northern part of the area (within which this site is situated) is totally different from that in the southern part. The Mythe area is almost exclusively different from the rest of the MSOA, which is much flatter, more densely

populated, and contains elements of a suitable network of routes for cycling on. A more detailed interrogation of the data will show that the 8% figure is largely due to the unusually high proportion of people who commute by cycle from Priors Park, which is at the other end of town. In the Town Council's opinion therefore, this statistic does not demonstrate that residents of this site are likely to commute by bicycle.

With regard to local rail services, the local railway station is not realistically accessible from this site by active or sustainable travel means unless travellers have plenty of spare time. Car journeys to the station can also take a long time, especially at peak times, due to traffic congestion and this is exacerbated during times of flood. The commute time by rail to Cheltenham may only be 10 minutes but the journey from the Mythe to the railway station will take very much longer. In any case, not many trains currently stop at Ashchurch and it is not clear when, or by how much, this will improve.

We note that National Highways has requested a construction traffic plan prior to the commencement of work on this site. We also note that National Highways has requested that the properties on this site should not be occupied until after M5 junction 9 has been improved. This is very important, since queuing on either side of the motorway is reaching epic proportions and this is forcing the use of adjacent, residential roads and lanes to become rat runs.

The Town Council recommends that much more substantive on the ground research needs to be carried out by the applicant in order to demonstrate the suitability of this site for a housing development if, indeed, it can be considered suitable. Development on this site would exacerbate problems for the people who already live in this parish, with respect to a deterioration in air quality, and additional strains on road and drainage infrastructures that are already overstretched. That is a prospect which the Town Council cannot support.

On 19th September the Town Council requested that S106 funding from this site be obtained for the following:

- All building sites require archaeological survey and finds are given to Tewkesbury Museum. There is now limited space available, so provision of an appropriate environmentally-controlled storage facility for archaeology finds should be considered.
- New residents will expect to find lots of local organisations to join and local events to attend. Many local organisations are finding it increasingly difficult to find affordable spaces in which to store props, costumes, banners. Provision of a storage facility, perhaps in conjunction with an arts / craft space for making the items that is both affordable and accessible for local groups to use.
- Improve the junction to Bushley and footpath & / or cycleway along the road to Twyning.
- Additional secure cycle storage in the Town Centre.
- Flood protection from the River Avon due to the new houses

Regarding CIL, the Town Council replied that

- 'The Planning Committee believes that something needs to be done alleviate the remoteness of the Mythe and Twyning from Tewkesbury, perhaps with the provision of a small shuttle bus, together with the increased provision and improvement of bus shelters up there.
- Increased populations around our town centre will lead to more people who need to access our services. We would like to see investment in making its public buildings physically more accessible.'

What can we add to our previous comments?

We could include the recommendations contained in the hydrologist's report pertaining to an application to develop east of Bredon Road, as many of those would hold good here too; ie.

- A maintenance plan including details of scheduled regular inspections is implemented for the proposed attenuations basins. The SuDS features should be maintained for the lifetime of the development.
- The site developer, the contractor and future dwelling occupiers should sign up to Flood Risk Alerts and Warnings.
- To ensure that the local sewerage system is not overloaded, the Planning Authority should require a detailed analysis of the capacity of the system to take the effluent from the development and accompanying confirmation from the sewerage undertaker as a planning condition.
- The Planning Authority should ensure that independent assessments of runoff and discharge are undertaken, including potential cumulative impacts, for neighbouring proposed developments including the school and additional proposed housing.
- Betterment of the existing flood risk to the town could be considered by the developer, through oversizing of the mitigation measures to provide a clear reduction in future runoff potential from the Site.
- Identification of an appropriate company with responsibility for management and maintenance of the SuDS features for the lifetime of the development should be a condition of planning permission.

In addition, it is noted that the Town Council's request for storage facilities for the storage of archaeology has not made it into the list for either CIL or S106 money. As more sites are developed around Tewkesbury the need for such a facility grows. Tewkesbury Museum has now had to pause on taking in any more archaeology because it doesn't have any more space for it. There is nowhere else for it to go. Volunteers of Tewkesbury Museum could run another storage facility if one was provided.