

WTC Meeting - 1 April 2015

Comments on TBC Borough Plan

General

1. The overall layout and structure is logical and clear. The introduction to the document clearly sets out a vision and set of objectives for the plan period up to 2031 that are well based on current Government Guidance and sound planning principles.
2. Each Policy section is set against the background of the NPPF and its associated Guidance, plus the proposals and policies in the draft JCS, both of which are outside the scope of this consultation. These form the "skeleton" around which the Borough Plan adds the "flesh", and to that extent many of the detailed and more local policies are worthy of support.

Chapter 1

3. Chapter 1 (Section a) deals with Housing, and this is perhaps the section attracting closest public examination and concern. The large scale "urban expansions" outlined in the JCS are outside the scope of this Plan, which goes on to re-state the settlement hierarchy for towns and villages in the more rural parts of the Borough. Winchcombe and Bishops Cleeve are both classified as Rural Service Centres.
4. Specific Policies are set out dealing with:- a) Refurbishment of existing dwellings, b) Replacement dwellings, c) Domestic extensions, d) extensions of domestic gardens into adjoining agricultural land, e) mobile homes, and f) control of agricultural dwellings. All of these follow the well-used precedents **and should be supported.**
5. Policy HOU1 is, however, perhaps the most contentious and challenging section of the whole document as far as Winchcombe is concerned. This seeks to distribute the housing numbers within the more rural parts of the Borough, (and which are currently specified in the draft JCS), after taking into account the approvals given and other commitments in the intervening period. The net result, assuming that the overall figures in the JCS remain unaltered, requires a total of some 114 new dwellings to be identified and shared between Bishops Cleeve and Winchcombe as the two Rural Service Centres. It must be recognised that this figure can at best be considered "provisional", as further permissions are likely to be granted on infill plots or redevelopment sites, and more importantly, the total JCS requirement and its broad distribution will not be finally settled for some months. This has to be the starting point for any calculation of this kind.

6. The policy then goes on to identify a number of locations where the public are asked to express their views on their suitability for further housing development, and suggests a range of possible densities. It nevertheless recognises that in total these are far in excess of the actual likely requirements, but nevertheless seeks views on their suitability.
7. In the case of Winchcombe and Bishops Cleeve, there appears to be a fundamental misunderstanding of the overall context and characteristics and setting of each settlement. Winchcombe is severely constrained by the AONB and associated SLA, has an historic core containing many Listed Buildings, relatively poor public transport connections, and limited employment opportunities. On the other hand Bishops Cleeve has none of these constraints, and is a much more sustainable location, as has been shown by the past rate of growth.
8. The table of suggested locations and their potential capacities listed in the draft plan, are fundamentally at odds with this basic analysis, and their respective roles should be reversed, with Bishops Cleeve remaining the dominant settlement that is capable of taking further future growth without serious adverse consequences. Winchcombe, on the other hand, should only be required to accept very modest and sensitive growth to meet identified local requirements. Furthermore, given the scale of development currently under construction in the Town, any general housing growth should be programmed for the latter part of the plan period, in order to allow the community and the various services, to assimilate the changes currently taking place.
- 9. In the light of this broad analysis it would be inappropriate to comment at this stage on the suitability or otherwise of any of the individual locations listed. The W TC position should be to emphasise that both collectively, and in most cases individually, they amount to a scale of development that is entirely inappropriate, given the environmental and other constraints, and to urge the Borough Council to reconsider this aspect of this policy.**
10. The other item of interest to W TC is the policy supporting the provision of community infrastructure (IRCI), and related policies in the draft JCS. Being a Rural Service Centre by definition implies that residents from surrounding villages and hamlets will come into Winchcombe to use the services provided. It is important that the Borough Council recognise this when seeking any S.160 contributions or future CIL from developments in these surrounding settlements, and makes it available to those services/facilities within Winchcombe. **The policy should be amended to make this clear.**

11. Other **policies identified as appropriate for particular support** where they impact on the activities of the Town Council include:-

- a. TRAC1 - support for a cycling network and infrastructure,
- b. TRAC2 - Pedestrian Accessibility to be protected and enhanced,
- c. TRAC3 Support for bus facilities and the network. This is particularly important, in that Winchcombe is not well served by bus, and a wider range and frequency of services would be welcomed.
- d. TRAC6 - improving access to and frequency of rail services at Ashchurch Station.
- e. TRAC11 - Support for the restoration and improvement of the Gloucestershire and Warwickshire Railway between Cheltenham and Stratford-upon-Avon
- f. RCN10 — support for the protection and provision to an appropriate standard of outdoor playing space and sports facilities
- g. RCN4 - Protection of allotments.

Chapter 2

12. This chapter focuses on economic factors, and the following policies are of relevance to this area and **should be supported**:-

- a. EMP2 - this encourages the provision of new extension of existing employment uses, subject to criteria concerning traffic impact, impact on neighbouring properties, and environmental impact.
- b. EMP 3 - This seeks to prevent the amalgamation of small business premises into larger units in locations such as the Isbourne Business park, in order to retain a supply of small units suitable for business start-ups.
- c. EMP5 - This encourages the re-use and adaption of rural buildings whilst at the same time retaining the essential scale, form and character of the original building
- d. TORI and TOR2 - These two policies support proposals for tourism related development, including the provision of serviced/self catering accommodation, subject to essential safeguards relating to access, scale and potential environmental impact.
- e. RET1 - seeks to protect and enhance existing retail frontages by resisting changes of use and encouraging the productive use of upper floors.
- f. RET2 - sets out a framework against which to assess new retail proposals to ensure that the scale and impact is appropriate to the locality.
- g. RET4 - seeks to protect village stores and pubs by setting out the criteria against which any changes of use will be judged.

Chapter 3

13. This deals with design issues and the protection of the historic environment, and in particular the following policies **should be supported**:-

- a. HER1 - this sets the basic standards against which developments in Conservation Area are to be judged.
- b. HER2 and HER3 - seek to control the design standards for shop fronts in Conservation Areas and for alterations and extensions of Listed Buildings.
- c. HER4 This encourages proposals which retain buildings and features of local historic, archeological or architectural interest, and seeks to protect historically important groups of farm buildings from destructive development proposals or demolition.

14. On the question of development proposals in the AONB, the draft plan relies on the well established policies embodied within the NPPF and related Guidance which are familiar to Members, therefore no additional comments are required at this stage, as a Local Planning Authority cannot unilaterally amend a National Policy.

15. However, Policy ENV1 sets out the basis as to how judgments are to be made when assessing any proposals within the SLA in order to protect the quality of the natural and built environment, and should be supported.

Conclusion

16. The general format and structure of the document is clear and well presented, and many of the more detailed policies, as indicated above, should be supported.

17. The principal issue of concern is the attempt to pre-empt the outcome of the JCS process by indicating at this stage the predicted level of new housing required in the rural part of the Borough. Furthermore, there ought to be a fundamental re-think of the relationship between the two rural service centres, Winchcombe and Bishops Cleeve, with the emphasis being placed on Cleeve, which is a much more sustainable location and not constrained by important landscape designations.

18. If any further general housing is required in Winchcombe, then it should be programmed for the latter part of the plan period and be limited to meeting the locally identified needs. There are many more sustainable locations in other parts of the Borough that can accommodate further growth without impinging significantly upon areas of national landscape significance.