



PLANNING STATEMENT

Permission in Principle for residential development of up to 5 no. dwellings and associated vehicular access.

Poplar View Cottage, Teddington, GL20 8JA

On behalf of:

Mr Aidan Hughes November 2023



Contents

1.0	Introduction	3
2.0	The Application Site and Planning History	5
3.0	The Proposed Development	7
4.0	Planning Policy Context	8
5.0	The Principle of Housing on the Site	. 12
6.0	Summary and Conclusions	. 16



1.0 Introduction

- 1.1. Zesta Planning Ltd has been instructed by Mr Aidan Hughes ("the Applicant") to submit an application for Permission in Principle (PiP) for a up to five dwellings at Poplar View Cottage, Teddington, GL20 8JA.
- 1.2. The site comprises a 0.3 hectares of residential land and currently contains a single residential dwelling known as Poplar View Cottage and its associated garden land. The cottage fronts the highway with garden land to the side and rear. There is a single vehicular access directly onto the village-through road.
- 1.3. The application has been formulated with the Council's local policy framework in mind as well as the current shortfall in five-year deliverable housing land supply.
- 1.4. The site is located on the edge of the village of Teddington which contains a village hall, church and has bus routes through Bishops Cleeve to Cheltenham and to the principal settlements of Blockley and Chipping Campden. The village also has easy access via the A46 to Tewkesbury, Evesham and the M5 by private car. The application site is therefore considered to be in a suitable location for small-scale rural housing which accords with the TBP Policy RES4 and Joint Core Strategy (JCS) Policy SD10.
- 1.5. This application is also advanced under the provisions of Paragraph 11 of the National Planning Policy Framework (NPPF 2023) directing that permission should be granted where policies which are most important for determining the application are out-of-date, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 1.6. The appropriate location of the proposed development, together with the district's lack of a sufficient housing land supply, most certainly warrants the granting of a PiP in this case.
- 1.7. This Planning Statement describes the site, its context and the development proposal. It then sets out the relevant development plan policies and assesses the proposed development against the limited range of Permission in Principle matters concerning the location, land use and amount of development.
- 1.8. This Planning Statement also considers the influence of other material considerations such as national policy, especially with regard to housing land supply and sustainable development. It makes the clear case why the proposed development in principle should be permitted.

The 'Permission in Principle' process

1.9. The Permission in Principle (PiP) route to obtaining permission was introduced by the Town and Country Planning (Permission in Principle) Order 2017 (as amended), with the express purpose of



fast-tracking proposals for residential development in order to speed up the delivery of housing. It is also intended to be a simpler process for establishing the principle of residential development on a particular site.

- 1.10. PiP applications are restricted to minor developments of less than 10 houses only. The legislation limits the scope of matters to be decided at permission in principle stage and the Council's consideration is therefore limited to the following matters only.
 - location
 - land use
 - amount of development
- 1.11. A second stage of technical details consent allows for examination of the details of the development, at which time it is open to the council to refuse permission if harm in relation to other planning issues is identified that cannot be acceptably mitigated and, in a balanced judgement, is found to outweigh the housing and other benefits of the scheme.
- 1.12. The Planning Practice Guidance (PPG) suggests additional information may be voluntarily submitted with a PiP, particularly to give more certainty about how many dwellings a site is capable of supporting. In this case, as the applicant is seeking PiP for 5 no. dwellings, it is not considered necessary to submit an illustrative layout plan. It is self-evident that the site is large enough to accommodate 5 no. dwellings on the site, in a manner that will respect the prevailing character and pattern of built form in the vicinity of the site.
- 1.13. PPG states that a decision on whether to grant planning permission in principle must be made in accordance with relevant policies in the development plan unless there are material considerations, such the NPPF and national guidance, which indicate otherwise.



2.0 The Application Site and Planning History

The Application Site

2.1. The site comprises 0.3 hectares of residential land and currently contains a single residential dwelling known as Poplar View Cottage and its associated garden. The cottage fronts onto the highway with garden land to the side and rear. There is a single vehicular access directly onto the village-through road.

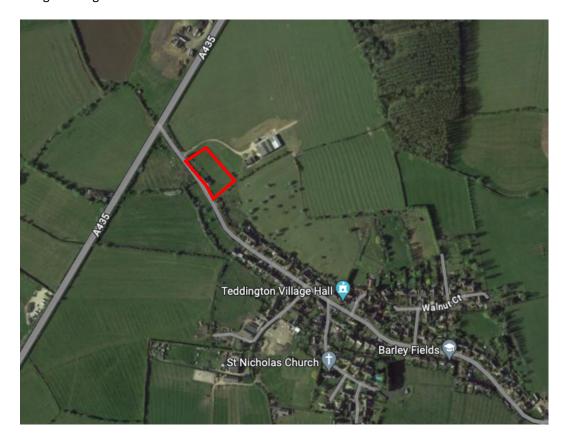


Figure 1 Aerial image of site. Source: Google Maps

- 2.2. The application site fronts onto the main village through-road. There is open countryside to the north-western side, neighbouring Tibblestone Farm and associated farmhouse to the rear.
- 2.3. Permission 21/01250/FUL was granted in November 2022 for the erection of 1 no. dwelling to the immediate south-east of the site. This dwelling is currently being built out. Beyond this new dwelling, lies the built form of the village.
- 2.4. A footway begins 90 metres to the south and connects continuously into the centre of the village. The village signs are located to the north of the farm access, indicating that the site is located within rather than outside of the village envelope.
- 2.5. The application site is not subject to any land-use designations or constraints which would restrict its use for housing. The site is located in a Special Landscape Area (SLA), yet not within an area of



Green Belt, Area of Outstanding Natural Beauty and does not fall within a Conservation Area. There are no nearby listed buildings and the site is located within Flood Zone 1 (low risk) as shown on the Environment Agency's Flood Maps for Planning.

Planning History

- 2.6. The Council's online records do not bring up any planning applications on the site.
- 2.7. It is however, of note that the planning permission was granted on 15th November 2022 under LPA reference 21/01250/FUL for the erection a new dwelling and garage on the paddock immediately adjacent to the site to the south-west. This permission is extant.



3.0 The Proposed Development

- 3.1. This application seeks Permission in Principle (PiP) for a residential development of up to 5 no. dwellings on the site. The existing cottage would be demolished to make better use of the natural plan-depth of the site, resulting in a net gain of up to 4 new dwellings on the site.
- 3.2. It is considered that five dwellings can be accommodated on the site comfortably. Beyond the principle of the amount of development appropriate to the site, detailed considerations are not matters for this application but for the next technical details stage and therefore are not determinative of the current application. However, it is currently envisaged that five dwellings can be accommodated in a linear form that respects the streetscene and character of the area; potentially comprising a configuration of two pairs of semi-detached properties and a detached dwelling. This is considered an appropriate use of the land in this location, which is already in residential use in a semi-rural edge of village setting.
- 3.3. It is envisaged that the dwellings would be two storey in height. The existing access point for Poplar View Cottage can be utilised to create a shared access point. There is adequate space on the site for parking, turning for each unit, with private garden spaces to the rear.



Figure 2 Aerial image with site outlined in red. Source: Google Maps



4.0 Planning Policy Context

- 4.1. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 sets out that applications should be determined in accordance with the Development Plan, unless other material considerations indicate otherwise.
- 4.2. The Development Plan in this case comprises of the Adopted Cheltenham, Gloucester and Tewkesbury Joint Core Strategy (JCS) and the Tewkesbury Borough Plan 2011 2031 (TBP). There is no neighbourhood plan either made or under preparation that covers the village of Teddington.
- 4.3. Other relevant material considerations including the Government's National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).

The Joint Core Strategy (JCS) – Adopted December 2017

- 4.4. The JCS for Cheltenham, Gloucester and Tewkesbury was adopted in December 2017 and now forms part of the Development Plan for the area. The JCS covers the plan period for 2011-2031 and will act as an overarching spatial strategy for the three districts. The following housing policies of the JCS are relevant to this case:
- 4.5. **Policies SP1 and SP2:** The need and distribution of new development set out a need for 35,175 new homes over the plan period, of which 9,899 will be delivered in Tewkesbury Borough. The general strategy is to meet the majority of this requirement through strategic allocations and smaller-scale settlements at Rural Service Villages and Service Centres.
- 4.6. However, this policy also provides exceptions for other forms of small-scale housing within villages outside the settlement hierarchy, that will contribute towards meeting the requirement and maintaining the vitality of rural communities.
- 4.7. **Policy SD10:** Residential Development sets out the how applications for new housing will be considered through the planning application process. Criterion 4.II is relevant to this application:
 - "Housing development on other sites will be permitted where, inter alia, it is infilling within the existing built-up areas of Gloucester, Cheltenham or Tewkesbury Borough's towns and villages"
- 4.8. **Policy SD4** relates to 'design requirements' and requires development to be of good quality design and take in to account all aspects of urban design.
- 4.9. **Policy SD6**: Landscape seeks to protect landscape character for its own intrinsic beauty and for its benefit to economic, environmental, and social well-being.
- 4.10. **Policy SD8:** Historic Environment seeks to conserve and enhance designated and undesignated assets and their settings as appropriate to their significance.



- 4.11. **Policy SD9**: Biodiversity and Geodiversity entails the protection and enhancement of the biodiversity and geological resource of the JCS area to establish and reinforce networks that are resilient to current and future pressures.
- 4.12. **Policy: SD14**: sets out that new development must not cause unacceptable harm to the local amenity including the amenity of neighbouring occupants.
- 4.13. **Policy INF1**: Transport Network seeks to ensure that development provides safe and accessible connections to the transport network to enable travel choice.
- 4.14. **Policy INF2**: Flood Risk Management sets out that developments must avoid areas at risk of flooding, in accordance with a risk based sequential approach.

Tewkesbury Borough Plan 2011-2031 (Adopted June 2022)

- 4.15. The Tewkesbury Borough Plan (TBP) complements the JCS as a lower-level development plan document. It was adopted in June 2022 and replaces the saved policies of the Tewkesbury Borough Local Plan to 2011.
- 4.16. **Policy RES2** defines settlement boundaries for the Tewkesbury Town Area, the Rural Service Centres, the Services Villages and Urban Fringe Settlements.
- 4.17. **Policy RES3** applies a restrictive approach to new housing development in rural areas outside defined settlement boundaries. An acceptable form of development in such locations is listed in Policy RES3 as "(3) Very small scale development at rural settlements in accordance with Policy RES4".
- 4.18. **Policy RES4 New housing at other rural settlements** permits very small-scale residential development within and adjacent to the built-up area of settlements not featured in the settlement hierarchy, in order to support the vitality of rural communities, subject to a range of criteria.
- 4.19. **Policy RES5**: New Housing Development sets out a list of principles to be met when considering new housing developments, including design, character, amenity, highway standards, parking and drainage.
- 4.20. **Policy RES11:** supports the change of use of agricultural land to residential garden land subject to certain criteria.
- 4.21. **Policy RES13**: Housing Mix states that new housing will be expected to provide for an appropriate mix of dwelling sizes, types and tenures to meet the needs of the local area, including the needs of older people and vulnerable groups.



- 4.22. **Policy DES1**: Housing Space Standards states that the Council has adopted the Government's nationally described space standards and that new residential development will be expected to make adequate provision for private outdoor amenity space appropriate to their size.
- 4.23. **Policy LAN1:** New development will be permitted within Special Landscape Areas providing it does not cause harm to its special features, maintains its quality and visual attractiveness and seeks opportunities to enhance the landscape character.
- 4.24. **Policy LAN2**: Landscape Character states that all development through sensitive design, siting and landscaping must be appropriate to and integrated into their existing landscape setting.
- 4.25. **Policy NAT1:** Biodiversity states that schemes that will conserve, restore or enhance biodiversity will be permitted.

The National Planning Policy Framework (NPPF)

- 4.26. The NPPF 2021 sets out the Governments overarching planning policies and how it intends them to be applied at the local level. The Framework provides guidance for local planning authorities in determining applications. As national guidance, it is capable of outweighing the provisions of the development plan.
- 4.27. **Paragraph 11** continues to provide a presumption in favour of sustainable development as per the previous version. This means approving development proposals that accord with the development plan without delay; and where the development plan is out-of-date granting planning permission unless the adverse impacts of development significantly and demonstrably outweigh the benefits.
- 4.28. **Paragraph 60** sets out the Government's aims of significantly boosting the supply of homes. It stresses the importance of sufficient amounts and variety of land coming forward where it is needed.
- 4.29. **Paragraph 79** states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.
- 4.30. **Paragraph 110** requires safe and suitable access to be provided. It states that development should only be refused on transport grounds where the cumulative impacts of development.
- 4.31. **Paragraph 152** sets out the planning system's role in supporting the transition to a low carbon future. The reuse of existing resources, including the conversion of existing buildings, is supported.
- 4.32. **Paragraph 199** sets out that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be).



Five-Year Housing Land Supply Position

- 4.33. Paragraph 11 of the NPPF sets out a presumption in favour of sustainable development. In October 2023 Tewkesbury Borough Council published a Five Year Supply Statement conceding that they cannot currently demonstrate a 5-year housing land supply and concluding that they have a 3.32 year supply. Regardless of the current figure employed, the result is a housing supply shortfall.
- 4.34. Important policies for the supply of housing in the adopted development plan are therefore out-of-date for decision making. In this context, the NPPF advises that the presumption should be that planning permission is granted unless there are adverse impacts of doing so which would significantly and demonstrably outweigh the benefits, when assessed against the policies of the NPPF as a whole the 'tilted balance'.
- 4.35. In such circumstances, planning applications should only be refused where the level of harm would be so significant and demonstrable so as to justify an overwhelming refusal, irrespective of whether or not the proposal complies with the development plan. This is a very high-level test, thus setting out an expectation that permission should normally be granted.
- 4.36. Paragraph 60 of the Framework seeks to boost significantly the supply of housing and Paragraph 69 recognises the importance of small sites in meeting housing requirements. Paragraph 79 states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. The proposal is consistent with these national policies.
- 4.37. In the planning balance, the greater the size of housing shortfall, the greater the benefit of even small-scale housing schemes. Economic benefits would also arise from the construction and occupation of the proposed houses supporting local services and businesses.
- 4.38. In line with the Framework, planning permission should be granted as there are no adverse effects of doing so that would so significantly and demonstrably outweigh the housing and other benefits of the proposal as to warrant a refusal.

Planning Practice Guidance

- 4.39. The NPPF is supplemented by the Government's Planning Practice guidance.
- 4.40. The PPG highlights that rural housing is essential to the retention of local facilities, and that all rural settlements can play a role in the delivery of sustainable development. This is a clear recognition from the Government that rural areas do need to be allowed to provide some organic growth, to support communities and people from rural backgrounds. Small-scale housing can also assist in building community cohesion.
- 4.41. PPG also provides relevant guidance on the Permission in Principle regime, as follows:



- A decision on whether to grant permission in principle must be made in accordance with relevant policies in the development plan unless there are material considerations, such as those in the NPPF, which indicate otherwise (para. 011).
- The scope of permission in principle is limited to location, land use and amount of development.

 Other matters should be considered at technical details consent stage.
- Additional information can be volunteered to give more certainty about how many dwellings
 the site is capable of supporting and whether mitigation of likely impacts that may result from
 development is possible (paragraph 043).



5.0 The principle of housing on the application site

- 5.1. An application for Permission in Principle may only be decided on the basis of matters of location, land use and the amount of development proposed, in accordance with legislation and national practice guidance governing this route to planning permission.
- 5.2. In this section it is demonstrated that the dwelling proposed would be acceptable in terms of location, land use and amount of development; meeting all the requirements necessary to merit a grant of permission in principle, with regard also being had to other material considerations relevant to the principle of development, notably the District Council's five-year housing land supply shortfall.

Location – Development Plan

- 5.3. The starting point for establishing the principle of new housing is governed by JCS policies SP1, SP2 and SD10. Policies SP1 and SP2 make it clear that there is an expectation to meet the housing needs of the Borough by providing a minimum of 9,899 new homes.
- 5.4. In delivering this requirement for new housing, Policy SD10 of the JCS sets out the criteria for a spatial strategy including permitting at criterion 4(ii) infilling within built up areas of Tewkesbury Borough's towns and villages. The site is located at the outer edge of the village of Teddington and is currently marginally separated from the main bulk of village by a small area of paddock and so new development would not be sandwiched between existing buildings. The development proposal, therefore, by definition, does not represent infill development in this case. However, the site is already in residential use and development of the site would be in keeping with the linear grain of development in the village, particularly considering the extant permission for a dwelling on the adjacent paddock. This, incidentally, was deemed to be compliant with policy RES4 of the Borough Plan.
- 5.5. The Tewkesbury Borough Plan (TBP) adopted in June 2022 complements the JCS as a lower-level development plan document. TBP Policy RES2 defines settlement boundaries for the Tewkesbury Town Area, the Rural Service Centres, the Services Villages and Urban Fringe Settlements within which new housing is acceptable in principle. Outside of these settlement boundaries, Policy RES3 applies a generally restrictive approach to new housing development but permits "(3) Very small-scale development at rural settlements in accordance with Policy RES4".
- 5.6. TBP Policy RES4 permits very small-scale residential development <u>within and adjacent</u> to the builtup area of settlements not featured in the settlement hierarchy, in order to support the vitality of rural communities, subject to a range of criteria as follows:



- (a) it is of a scale that is proportionate to the size and function of the settlement and maintains or enhances sustainable patterns of development;
- (b) it does not have an adverse cumulative impact on the settlement having regard to other developments permitted during the plan period;
- (c) it complements the form of the settlement and is well related to existing buildings within the settlement;
- (d) the site of the proposed development is not of significant amenity value or makes a significant contribution to the character and setting of the settlement in its undeveloped state;
- (e) the proposal would not result in the coalescence of settlements;
- 5.7. Teddington is a small village with a church and village hall but without a defined settlement boundary within the Tewkesbury Borough Plan and therefore Policy RES4 is applicable to the site.
- 5.8. Having regard to the criteria above, the development of 5 no. dwellings would be proportionate to the size and function of the settlement. The location is considered well related to existing buildings, the form of the settlement and would not result in coalescence. It would not have an adverse cumulative impact on the settlement. There have been 13 new dwellings granted permission in Teddington since the beginning of the plan period which, together with the dwellings, represent an organic level of growth that is in proportion with the scale of the village.
- 5.9. On the basis of TBP policy RES4, it is considered that new dwellings in this location are acceptable in principle. However, there are other material planning considerations to be taken into account as set out below.
- 5.10. In summary, whilst it is acknowledged there is some conflict with SD10, the proposal complies wholly with policy RES4 of TBP. Furthermore, the Council cannot currently demonstrate a robust five-year deliverable housing land supply. As a result, the policies of the Core Strategy relating to the supply of housing are out-of-date in terms of maintaining a five-year supply of housing as required by Paragraph 74 of the NPPF. Therefore, only limited weight able to be afforded to these housing policies. In such circumstances, paragraph 11 d) of the NPPF sets out that planning permission should be granted, unless the application of Framework policies that protect areas or assets of particular importance provide a clear reason for refusing the development proposed.
- 5.11. Utilising a sustainable site in the context of the village must be afforded enhanced weight in the context of the housing land supply deficit, whilst the provision of housing is a clear benefit that weighs in favour of the application.

Location – sustainable and accessible



- 5.12. The site is located on the edge of Teddington which is a small village containing a village hall and church where, as explained above, TBP Policy RES4 supports residential development. A footway is only 90 metres to the east of the site and connects continuously into the centre of the village. The village signs are located to the north of the farm access, indicating that the site is located within rather than outside of the village envelope.
- 5.13. It is a 300 metre walk from the site to the centre of the village, to the village hall and bus stops, which has two routes running to Bishops Cleeve and Cheltenham and to the larger Cotswold settlements of Mickleton, Blockley and Chipping Campden. The village also has easy access via the A46 to Tewkesbury, Evesham and the M5 by private car.
- 5.14. It is likely that occupiers of the dwellings will need to rely on the use of a private car, yet local and national policy are supportive of small-scale housing in rural villages, where it will enhance or maintain the vitality of rural communities. Furthermore, paragraph 79 of the NPPF acknowledges that where there are groups of smaller settlements, development in one village may support services in a village nearby.
- 5.15. The development proposal would create up to five family homes which will benefit the local economy through the construction phase and in occupation, supporting the prosperity of the village and nearby settlements.
- 5.16. Taking the above into account, the development proposal would provide an appropriate level of rural housing for the village and the site is suitably located in terms of accessibility.

Location – area character

- 5.17. The site is already occupied by a single dwelling and its associated garden land with abuts the highway to the side of the existing dwelling. The existing dwelling on the site is served by a large garden which has a domestic character with paraphernalia across the site. The domestic character and use are therefore already established on the site.
- 5.18. The application site does not fall within any national landscape or heritage designation and is already in residential use. While seemingly visually separated from the bulk of the village, the site adjoins land immediately south-east which is currently being developed to provide 1 no. new dwelling.





Figure 3 Adjacent site currently being developed as a single dwelling

- 5.19. The site is a part of a predominantly residential streetscene with a linear grain of development, comprising a combination of detached and semi-detached dwellings addressing the highway. It is envisaged that the proposed dwellings would front the highway in a line, following the linear grain of development of the main village through-road. This would appear in keeping with the character and appearance of the area.
- 5.20. Residential development here would be in-keeping with an established linear development of the village and not result in conflict with Policy RES4. Furthermore, should officers consider that there would be an element of harm arising, it is strongly held that that harm would be outweighed by the benefits in favour of the proposal, which enable the development to be supported in the context of the 'tilted' planning balance.

Use and Amount

5.21. As mentioned previously, the application site is already in residential use and has a domestic character. The potential density of up to five dwellings on the site is considered in keeping with the scale and density of the existing linear development along the village through-road. The proposed development of the site is therefore considered to complement the surrounding land uses.



- 5.22. In terms of access, it is envisaged that the existing access can be utilised and improved as necessary to form a shared access to serve the dwellings in order to maintain the native hedgerow across the front of the site. The exact details would be assessed at the technical details stage.
- 5.23. The site is also located within Flood Zone 1 and is therefore at a low risk from flooding. Drainage details would also be secured at the technical details stage.

Other Material Considerations: Housing land supply shortfall and the tilted balance of NPPF paragraph 11(d)

- 5.24. NPPF paragraph 11 sets out a presumption in favour of sustainable development whereby, if a local planning authority cannot demonstrate a 5-year housing supply, planning permission should be granted for new housing development unless there are adverse impacts of doing so which would significantly and demonstrably outweigh the benefits, when assessed against the policies of the Framework as a whole. This is otherwise known as the 'tilted balance' in favour of development.
- 5.25. Tewkesbury Borough Council concedes that it cannot currently demonstrate a 5-year housing land supply. In light of the Council's currently housing land supply situation the 'tilted balance' is engaged. Relevant Development Plan policies for the supply of housing are to be considered out of date and of reduced weight in decision making.
- 5.26. Paragraph 11 d) sets out that the tilted balance is engaged unless a clear reason exists for refusal of planning permission with regard to impact on protected areas or assets of particular importance. These areas include habitat sites and/or designated as Sites of Special Scientific Interest, land designated as Green Belt, Local Authority Green Space, An Area of Outstanding Natural Beauty, a National Park or defined as Heritage Coast, irreplaceable habitats, designated heritage assets and areas at risk of flooding or coastal change. While the site is located in a Special Landscape Area, none of the NPPF protected areas or assets designations apply to the application site, therefore the tilted balance is not disengaged in this case.
- 5.27. In such circumstances, planning applications for housing should only be refused where the level of harm would be so <u>significant</u> and <u>demonstrable</u> that an overwhelming refusal is justified, and irrespective of whether or not the proposal complies with the development plan. This is a very high-level test, thus setting out an expectation that permission should normally be granted when applying the tilted balance.
- 5.28. When considered in the overall tilted planning balance and presumption in favour of sustainable development, the application must be considered acceptable, with the valuable contribution to boosting housing supply which this proposal would make towards to helping meet the substantial undersupply of housing in Tewkesbury Borough offering a significant benefit which attracts significant weight.



- 5.29. In this case, the fact that the site is located on the edge of a village where the TBP supports rural housing and provides social, economic and environmental benefits undoubtedly weighs in favour of the proposal.
- 5.30. Furthermore, there would be no undue adverse environmental or landscape impacts to set against the benefit of an additional residential development in this location.
- 5.31. Therefore, in line with the Framework, planning permission should be granted as there are no adverse effects of doing so that would significantly and demonstrably outweigh the housing and other benefits of the proposal.
- 5.32. In conclusion, whilst the development would comply with the spatial strategy of the Development Plan, the proposal would also represent a sustainable development in the context of paragraph 11(d), for which permission in principle should be granted.



6.0 Summary and Conclusions

- 6.1. In conclusion, the proposal would represent sustainable development in a rural area in the context of Tewkesbury Borough Plan Policy RES4 and paragraph 79 of the NPPF. The development proposal of up to five dwellings on the site, in place of the existing Poplar View Cottage would enhance the prosperity of the village of Teddington and make more efficient use of a site already in residential use.
- 6.2. Notwithstanding the compliance with policy, and in the context of NPPF paragraph 11(d), Tewkesbury Borough Council are unable to demonstrate a 5-year housing land supply position and so the Council's policies for housing are out-of-date and can therefore only be given limited weight in the overall balance.
- 6.3. In this regard, the development proposal presents a good opportunity to boost housing in a sustainable location, which ought to weigh heavily in favour of the application and provides clear justification for granting permission.

