

Urban Capacity Study



April 2025

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EXECUTIVE SUMMARY

- This Urban Capacity Study (UCS) has been prepared using data available at the time of production. It reflects the best information currently accessible regarding land availability, site constraints, and development potential. However, urban environments are dynamic and subject to ongoing change. As such, this study should be regarded as a snapshot in time and will require periodic review to ensure its continued relevance and accuracy. Future updates will incorporate more recent data, including outcomes from ongoing housing monitoring, updated HELAA site assessments, and any changes in planning policy or local circumstances.
- An UCS is a realistic assessment of sites with potential to come forward for residential development within the Borough's boundaries, providing evidence to the council regarding options to meet its housing targets set by the National Planning Policy Framework (NPPF).
- This study is undertaken in the context of the emerging Strategic and Local Plan (SLP), fulfilling our duty to cooperate and working together with Gloucester and Cheltenham to produce an appropriate development strategy and meet the areas housing requirements.
- This document was produced by Tewkesbury Borough Council Planning Policy team and the SLP team, with information from the Housing and Property teams of the Borough. Elected members and parish councils were consulted on potential sources of supply during early 2025.
- The assessment is informed by 'current' sources, such as granted planning permissions, site allocations, and deliverable sites in the HELAA (Housing and Economic Land Availability Assessment) and Brownfield Land Register (BLR), as well as 'potential' sources, such as long-term vacant properties, publicly owned sites, windfall sites and Regulation 18 sites. Density multipliers were applied to potential sources to ascertain realistic capacity.
- The main finding is that Tewkesbury cannot meet its housing demand by solely relying on urban land within its administrative boundary. The urban capacity identified within Tewkesbury Borough would only meet just over 15% of their overall requirement even if all current and potential sites were to come forward within the plan period.
- Therefore, to meet Tewkesbury's requirements in full, further evidence is required in terms of a Green Belt Study and effective joint working on the SLP will need to continue under the duty to cooperate to establish the appropriate development strategy to meet the need across the whole SLP area.

1. PART 1: CURRENT SOURCES OF SUPPLY

1.1 This covers sources of supply that are already in the planning system, that we are aware of split out into separate sections in this report comprising:

- A. Supply from detailed planning permission within the urban areas;
- B. Allocated supply within the Development Plan;
- C. Deliverable sites in the Housing and Economic Land Availability Assessment (HELAA); and
- D. Sites on the Brownfield Land Register (Part 1)¹.

A. Supply from Detailed Planning Permission

1.2 Table 1 below provides details of sites within Tewkesbury Borough by parish that have detailed planning permission, which is where either full permission has been granted or reserved matters as of 31 March 2024 and the dwellings have not been built out. For more details, please see the latest [Five Year Housing Land Supply Statement 2024](#). (Note for the purpose of this report only sites falling on brownfield land and / or in the existing built-up areas have been included within the figures).

Table 1: Supply of net consented dwellings (with detailed planning permission) yet to be completed

Parish	Consented dwellings (net) yet to be completed
Bishop's Cleeve	158
Leigh	2
Gotherington	7
Twyning	5
Winchcombe	16
Shurdington	27
Tewkesbury	41
Maisemore	1
Badgeworth	10
Gretton	2
Toddington	7
Staverton	1
Churchdown	13
Deerhurst	1
Brockworth	5
Dumbleton	2
Innsworth	2
Southam	5
Uckington	1
Woodmancote	2
Twigworth	3

¹ At the time of publication Tewkesbury Borough Council did not have a BLR (Part 2). Part 2 of a BLR would show sites granted permission in principle. See [Planning Practice Guidance on Brownfield land registers](#).

Prescott	1
Teddington	3
Stoke Orchard	2
Elmstone Hardwicke	1
Forthampton	2
Total	320

- 1.3 The total figure determines what is permitted as of 31st March 2024. Clearly every year new permissions, for large and small developments, will continue to be permitted. This report anticipates which sites these future permissions may be granted upon, for example, sites allocated for housing. Inevitably some windfall permissions will be granted on larger sites that, at this point in time, are unknown or anticipated. For further discussion on the potential windfall contribution to urban capacity see Part 2 of this report.

B. Allocated Supply

Allocated Supply within the Joint Core Strategy (JCS)

- 1.4 Table 2 below provides details of those sites within the Tewkesbury administrative boundary allocated within the JCS.

Table 2: Supply from JCS Allocations

Strategic Allocations	Dwelling completions (net) as of 31 March 2024	Indicative dwellings (net) capacity
A1 - Innsworth & Twigworth (wholly Tewkesbury to meet Gloucester's needs)	981	1,314
A2 -South Churchdown (wholly Tewkesbury to meet Gloucester's needs)	399	701
A3 - North Brockworth (wholly Tewkesbury to meet Gloucester's needs)	629	871
A4 - North West Cheltenham (part in Cheltenham to meet Cheltenham's needs)	265	4,020
A5 – Ashchurch (employment)	0	0
A7 – West Cheltenham (part in Tewkesbury / part in Cheltenham to meet Cheltenham's needs)	0	1,100
Total		0²

² Note the strategic allocations allocated within Tewkesbury Borough adjoining Gloucester and Cheltenham are not assisting towards Tewkesbury Borough Council needs and therefore do not contribute to the current urban capacity figures in this study

Allocated Supply within the Tewkesbury Plan

- 1.5 Table 3 provides details of those sites allocated within the Tewkesbury Borough adopted Plan that do not otherwise have planning permission and shows the total available capacity of 365 dwellings. Please see the following webpage for more information - [Tewkesbury Borough Plan](#).

Table 3: Supply from Tewkesbury Local Plan Allocations

Reference in the Tewkesbury Plan	Site	Indicative dwellings (net) capacity
TEW1	Land at Odessa Farm, Tewkesbury	100
TEW3	Spring Gardens, Tewkesbury	65
TEW4	Healings Mill, Tewkesbury	100
SHU3	Garage site at Harrison Road, Shurdington	15
TOD1	Land adjacent to Pheasant Public House, Toddington	25
WOO1	Land adjacent Oxbutts Caravan park, Woodmancote	60
Total		365

Other Allocated Supply

- 1.6 Table 4 shows sites allocated in adjoining local plans that help towards meeting the needs of Tewkesbury Borough Council.

Table 4: Sites in other allocations

Reference in the South Worcestershire Development Plan³	Site	Gross dwellings capacity	Indicative dwellings (net) capacity
SWDPR 54: Mitton	Land at Mitton	1000 (500 towards Wychavon's needs)	500
Total			500

C. Potential Supply from Sites in Tewkesbury's latest published HELAA

- 1.7 Submitted and officer found sites have been assessed through the most recent version of the Tewkesbury Borough Councils HELAA. This process is periodically updated and assesses sites based on their 'suitability', 'availability' and 'achievability' (the latter effectively meaning they are financially viable).

³ [SWDPR - Reg 19 Publication Document](#)

- 1.8 Please note that a sites inclusion within the HELAA does not indicate that planning permission would be granted at a later date. The HELAA considers sites at high-level only and does not go into the level of detail that would be required to allocate a site or grant a permission.⁴
- 1.9 To avoid double counting, HELAA sites that already have planning permission or feature within the allocated supply (both JCS and Tewkesbury Borough's adopted Plan) have been discounted in the UCS. In addition, greenfield HELAA sites that are not considered to be in the urban area have also been discounted from this process.
- 1.10 Therefore, **there are not considered to be any existing HELAA sites that could contribute towards the urban capacity of Tewkesbury at this time.** New HELAA sites submitted at regulation 18 were also analysed and discussed in part 2 of the report.

D. Sites on the Brownfield Land Register (Part 1)

- 1.11 The BLR identifies brownfield sites (also known as 'previously developed sites') that are suitable for housing development. It is a statutory requirement for Local Planning Authorities to keep up an up-to-date register and a review is undertaken annually. Further information is available at: [Brownfield Land Register - Tewkesbury Borough Council](#).
- 1.12 Many sites on the BLR are also identified in the HELAA and as such there is a crossover. Table 5 details the BLR site capacity that is not already allocated in the JCS or the Tewkesbury Plan, nor featured in the HELAA. Their listing here does not confirm that they will be developed in the future, only that there may be potential capacity from this source. Note that the actual capacity may be higher than as set out in the table below if the higher density allowances discussed in Part 3 were to be applied.

Table 5: Deliverable sites on the Brownfield Land Register: Part 1

Brownfield Land Register (BLR) Reference	Site	Indicative dwellings (net) capacity
TBC-BR15	MAFF Site, Tewkesbury	25 (0.9ha)
TBC-BR7	Highcross House, Pound Lane	5 (0.19ha)
TBC-BR16	Knightsbridge Nursery, Tewkesbury Road	24 (1.25ha)
TBC-BR17	Ashchurch Rifle Range	10 (0.49ha)
TBC-BR19	Garages to rear of Harrison Road, Shurdington	6 (0.24ha)
TBC-BR20	Land adjacent to the former Apple Tree Inn	5 (0.42ha)
TBC-BR21	Land at Burnside, Mill Lane, Prestbury	25 (0.85ha)
TBC-BR22	Land at the Old Farmers Arms, Evesham Road	6 (0.29ha)
TBC-BR23	Land off Orchard Road	6 (0.16ha)
TBC-BR24	Moat Farm, Gotherington	11 (0.45ha)
TBC-BR25	Orchard House, Hayden Lane	6 (0.24ha)

⁴ The most recent version of the HELAA, including details of the methodology used, is available to view at: [Evidence base - Tewkesbury Borough Council](#)

TBC-BR26	Wharf Office, Coombe Hill	1 (0.05ha)
TBC-BR27	Land at Elmbridge Court	55 (2.11ha)
TBC-BR28	Land at Frog Furlong Lane, Innsworth	50 (1.4ha)
	Total	235

Totals for Part 1:

1.13 In terms of the current sources of supply in Tewkesbury Borough, table 6 below provides total indicative capacity.

Table 6: Total supply from Part 1

Source	Indicative dwellings (net) capacity
A. Error! Reference source not found. Error! Reference source not found. 4 (Table 1)	320
B. Allocated supply within the Development Plan (Error! Reference source not found. + C. Table 3: Supply from Tewkesbury Local Plan Allocations D. (Table 3) + Supply from other allocations (Table 4)	865
E. Potential HELAA sites (Table 5)	0
F. Error! Reference source not found. (Table 6)	235
Total	1,420

2. Part 2: POTENTIAL SOURCES OF SUPPLY

- 2.1 Potential sources of supply in Tewkesbury Borough are fairly wide ranging but clearly may lack the certainty of the committed or allocated sites assessed in part 1. Table 7 below highlights some of these sources.

Table 7: Potential Sources of Supply

Potential source of supply	Information source (s)
A. Housing Strategy opportunities including long term vacant properties	Sources of supply/opportunities included within any housing strategies, National council tax database.
B. Tewkesbury Borough Council owned sites	a. Parking studies b. Open space strategies c. Playing pitch strategies d. Allotment strategies e. Asset management plans f. Engagement with asset management teams
C. Other publicly owned sites	Sites submitted by public bodies following targeted consultation.
D. Officer and member identified sites not identified elsewhere	Sites submitted by Members / Town Councillors following targeted consultation. Information from Tewkesbury officers based on local knowledge.
E. Town centre repurposing	Trend analysis through permitted development rights.
F. Repurposing / redevelopment existing sites	Trend analysis through permitted development rights and submitted information.
G. Windfall	Housing monitoring documents.
H. SLP Call for sites	Submitted information.

A. Housing Strategy opportunities including long term vacant properties

- 2.2 The Council's current adopted Housing Strategy is the Tewkesbury Borough Housing and Homelessness Strategy Tewkesbury Borough Council 2022-26⁵. The vision for the strategy is *"Meeting the housing needs of our communities; supporting them to be resilient and to thrive sustainably, now and into the future"* and it has three identified key themes: increasing housing supply, regenerating and making best use of existing stock and meeting the needs of homeless households and those with specific housing needs.
- 2.3 In terms of making the best use of existing stock, the strategy highlights that the Borough had 510 empty homes (i.e. homes that have been empty for 6 months or more) as at October 2021. It is likely that the 510 figure did not distinguish between short term and long-term empty homes,

⁵ [Housing and homelessness strategy - Tewkesbury Borough Council](#)

empty due to flooding or properties subject to the empty homes discount. It is the long-term vacant properties that would make the biggest difference to meeting housing needs if they could be brought back into productive use. In terms of more recent trends for Tewkesbury and other districts in the county, the information in Table 8 below is based on the latest data from the [Council Taxbase 2024 in England - GOV.UK](#).

Table 8: National Council Tax Database – Local Authority Level Data

National Council Tax Database – Local Authority Level Data		
Authority	As of 15 Sept 2024: Total number of dwellings on the Valuation List	As of 15 Sept 2024: Number of dwellings that are classed as empty and have been empty for more than 6 months excluding those that are subject to the empty homes discount or empty due to flooding
Gloucester	59,968	447
Cheltenham	57,469	590
Tewkesbury	45,783	259
Cotswold	46,109	821
Stroud	56,756	615
FoD	40,886	486
TOTAL for SLP	163,220	1,296
TOTAL for Gloucestershire	306,971	3,218

2.4 The Housing and Homelessness strategy points to the following actions that could help to make the best use of existing stock:

- i. Develop a complementary strategy to reduce the number of empty homes, making use of the legal powers available; and
- ii. Work with partners to establish arrangements for management of empty homes that are brought into use through management orders.

2.5 [Planning Practice Guidance \(PPG\) on housing supply and delivery](#)⁶ under the heading of ‘How should authorities count bringing empty homes back into use?’ states “To be included as a contribution to completions it would be for the authority to ensure that empty homes had not already been counted as part of the existing stock of dwellings to avoid double counting” (Paragraph: 030 Reference ID: 68-030-20190722).

2.6 Pending this analysis and the need to avoid double counting, the UCS currently consider that **there is no urban capacity potential at this point in time** from bringing unoccupied and unfurnished homes back into use.

⁶ Accessed on 11/11/2024

B. Tewkesbury Borough council owned sites

Development potential from car parks

- 2.7 TBC does not currently have a parking strategy or any suitable disused car parks and it appears unlikely that car parks will be disposed of for other uses in the near future. As such, it is considered that **there is unlikely to be any capacity** realised from car parks at this time.

Development potential from public open space

- 2.8 The [Cheltenham and Tewkesbury Open Space Assessment Report and Strategy](#) was undertaken by Knight, Kavanagh & Page, published in November 2016. This report provided detail with regards to what open space provision exists in the area, its condition, distribution and consultation findings. It considered a number of different types of open space comprising the following types:
- i. Parks and gardens;
 - ii. Natural and semi-natural greenspace;
 - iii. Amenity greenspace;
 - iv. Provision for children and young people;
 - v. Allotments;
 - vi. Cemeteries/churchyards;
 - vii. Civic spaces; and
 - viii. Green corridors.
- 2.9 Each type of open space received separate quality and value scores. This also allowed for *“application of a high and low quality/value matrix to further help determine prioritisation of investment and to identify sites that may be surplus within and to a particular open space typology”* (page 7).

Parks and Gardens

- 2.10 This typology covers urban parks and formal gardens which provide accessible high-quality opportunities for informal recreation and community events. There are 4 sites classified as parks and gardens in Tewkesbury covering 3.77ha, and these are managed and maintained by either the council or the respective parish councils.
- 2.11 Parks and gardens sites in Tewkesbury are evenly split between those that rate above and below the threshold for quality. The two sites (Anglo-American Garden and Wheatpieces Community Centre Garden) which score below the threshold are not observed as having any quality concerns and again, lower scores can be attributed to fewer ancillary facilities. It is worth noting that Wheatpieces Community Centre Garden only scores marginally below the threshold with 54%. The Tewkesbury Parks and Gardens provision score high for value; a reflection of the social interaction, health benefits and sense of place that these sites offer.

Natural and Semi-Natural Greenspace

- 2.12 The natural and semi-natural greenspace typology refers to woodland, scrub and grassland, wetlands, wastelands, bare rock habitats and commons. They are often associated with providing wildlife conservation and biodiversity. There are ten natural and semi-natural greenspace sites, equating to 810.35 hectares situated in Tewkesbury.
- 2.13 A significant proportion of the total amount of natural and semi-natural greenspace provision in Tewkesbury can be attributed to four particularly large sites: Cleeve Common (455.93 ha), Highnam Woods (123 ha) Leckhampton Hill (69.99 ha) and Severn Ham (70.79 ha).
- 2.14 The majority of natural and semi-natural sites in Tewkesbury (89%) score above the threshold for quality. The only site to score low is Henley Bank Community Wood. However, this site has no specific quality issues and its low score can be attributed to a lack of ancillary features.
- 2.15 All sites in Tewkesbury rate above the threshold for value. This is due to this typology providing high ecological value through the habitats they provide for animals and plant species. Higher scoring sites for value, such as Leckhampton Hill also offer educational and heritage value as well as social inclusion opportunities and health benefits.

Amenity Greenspace

- 2.16 Amenity greenspace is defined as sites offering opportunities for informal activities close to home and work or enhancement of the appearance of a residential area. They can include informal recreation spaces, recreation grounds, housing green spaces, village greens and other incidental space.
- 2.17 There are 40 amenity greenspaces in Tewkesbury, equating to 85.79 hectares. A high proportion of amenity greenspace sites (83%) score above the quality threshold. Lower quality scores can mainly be attributed to size, lack of ancillary facilities and/or maintenance.
- 2.18 In addition to its multifunctional role, amenity greenspace makes a valuable contribution to visual aesthetics for communities, hence the majority (85%) of sites rating above the threshold for value.
- 2.19 Three sites score low for both quality and value. The report recommends that if a site cannot be improved, changing its purpose to that of a different form of open space provision could be considered.

Provision for Children and Young People

- 2.20 This includes areas designated primarily for play and social interaction such as play areas, ball courts, skateboard areas and teenage shelters.
- 2.21 There are 45 play sites in Tewkesbury, equating to 7.30 hectares.
- 2.22 A high proportion of amenity greenspace sites (78%) score above the quality threshold. Again, lower quality scores can be mainly attributed to the tired look and dated appearance at some sites.

- 2.23 Reflecting its role in providing healthy, inclusive and safe facilities, the majority of play sites across Tewkesbury (92%) rate above the threshold for value. There are six sites to rate below the threshold for both quality and value. This tends to reflect a limited amount and range of equipment at such sites; often to a poor level of standard.

Allotments

- 2.24 Allotments cover open spaces that provide opportunities for people to grow their own produce. There is a statutory duty on local authorities to provide allotments if there is a demand.
- 2.25 There are 17 allotments sites in Tewkesbury, equating to over 16 hectares. Of these, two are owned and managed by Tewkesbury Borough Council, with others being managed by other parish councils, allotment associations, or are privately owned.
- 2.26 Current provision for Tewkesbury is below the National Society of Allotment and Leisure Gardens (NSALG) recommended amount (10 plots per 1000 people). There are currently waiting lists for allotments within the Borough suggesting that demand for allotments is not currently being met by supply.
- 2.27 All allotment provision in Tewkesbury scores above the quality threshold and all allotment sites are assessed as high value reflecting the associated social inclusion and health benefits, their amenity value and the sense of place offered by provision. Concurrently, the Assessment Report recommends that measures should be explored to provide additional plots in the future.

Churchyard/Cemeteries

- 2.28 In Tewkesbury there are 35 churchyards and cemeteries equating to 19.21 hectares of provision. The largest contributor to burial provision in the area is Tewkesbury Cemetery at 3.41 hectares.
- 2.29 The majority of churchyard and cemetery provision (90%) in Tewkesbury rates above the threshold set for quality. The four sites that score below the threshold for quality; St Andrew's Church, Toddington St Catherine's Church, The Leigh, St Mary's Church, Dumbleton, St John the Baptist Church also have specific quality issues with loose headstones being noted. However, all cemeteries and churchyards are assessed as high value in Tewkesbury, reflecting the role they have within communities as well as their cultural and heritage value.

Civic Space

- 2.30 This type of typology includes civic and market squares and other hard surfaced areas designed for pedestrians.
- 2.31 There are two sites classified as civic spaces in Tewkesbury, equating to just 0.06 hectares. One site in Tewkesbury rates above the threshold for quality and one rates below. The site that rates below (Forthampton War Memorial) has fewer ancillary features.

- 2.32 All civic spaces in Tewkesbury are assessed as high value; reflecting the social and cultural/heritage role and sense of place to the local community provision provides.

Green Corridors

- 2.33 The green corridor typology includes sites that offer opportunities for walking, cycling or horse riding, whether for leisure purposes or travel. This may include river and canal banks, road and rail corridors, cycling routes, pedestrian paths, rights of way and permissive paths.
- 2.34 Although green corridor provision does exist in Tewkesbury it has not been identified within the audit.
- 2.35 Given that the open spaces referred to above generally have high quality and value scores across the board and there is under provision in some typologies it is concluded that it **unlikely that there is any housing capacity within any of the sites at this time.**

Development potential from playing pitches

- 2.36 The [Tewkesbury BC Playing Pitch Strategy](#) (PPS) was produced on behalf of Tewkesbury Borough Council by Knight, Kavanagh & Page Ltd, published in June 2017. This report provides a strategic framework for the maintenance and improvement of existing outdoor sports pitches and ancillary facilities between 2016 and 2037. The PPS covers the following facilities:

Pitch sports:

- Football pitches
- Cricket pitches
- Rugby union pitches
- Artificial grass pitches (AGPs – including use for hockey)
- Other pitch sports

Outdoor sports:

- Bowling greens
- Tennis courts
- Athletics
- Golf
- Netball

- 2.37 The strategic recommendations in the conclusion of the report are to:
- a. Protect playing field sites through local planning policy;*
 - b. Secure tenure and access to sites for high quality, development minded clubs, through a range of solutions and partnership agreements;*
 - c. Maximise community use of education facilities where there is a need to do so;*
 - d. Improve quality*
 - e. Adopt a tiered approach (hierarchy of provision) for the management and improvement of sites.*

- f. Work in partnership with stakeholders to secure funding;*
- g. Secure planning gain for playing pitches from housing growth*
- h. Rectify quantitative shortfalls in the current pitch stock.*
- i. Identify opportunities to add to the overall stock to accommodate both current and future demand.*

2.38 The PPS Assessment shows that all currently used playing field sites require protection and therefore cannot be deemed surplus to requirements because of shortfalls now and in the future. Lapsed, disused, underused and poor quality sites should also be protected from development or replaced as there is a requirement for playing field land to accommodate more pitches to meet the identified shortfalls. Therefore, **it is unlikely that there is any housing capacity within this source at this time.**

Development potential from Council Assets

- 2.39 The TBC [Strategic asset management plan](#) covering 2024 – 2029 provides an overview of the approach to the on-going development of the council's property assets whilst setting the strategic direction of its small portfolio over the timeframe.
- 2.40 Table 9 below highlights an overview of the key sites, the majority of which are sites required for operational needs and investments returns.

Table 9: Tewkesbury Borough Council Assets

Tewkesbury Council Assets		
Asset	Type	Notes
Gloucester Road, Tewkesbury	Operational Cemetery	Operational
Kayte Lane, Bishops Cleeve	Operational Cemetery	Operational
Roses Theatre Tewkesbury	Operational Buildings	Community Asset
Tewkesbury Leisure Centre	Operational Buildings	Community Asset
Spring Gardens Car Park	Car Parks	Operational
St Johns Avenue Community Parking Spaces	Car Parks & laybys	Community Asset
Railsmeadow car park, Tewkesbury	Car Parks	Operational
Vineyards Car Park, Tewkesbury	Car Parks	Operational
Gloucester Road Car Park, Tewkesbury	Car Parks	Operational
Oldbury Road Car park, Tewkesbury	Car Parks	Operational
St Mary's Lane Car Park, Tewkesbury	Car Parks	Operational

Station Road Car park, Tewkesbury	Car Parks	Operational
Lower Lode Lane car park, Tewkesbury	Car Parks & laybys	Community Asset
Bull Lane car park, Winchcombe	Car Parks	Operational
Back Lane car park, Winchcombe	Back Lane car park, Winchcombe Car Parks	Operational
Church Road Community parking, Bishops Cleeve	Car Parks & laybys	Community Asset
Chapel Hay car Park, Churchdown	Car Parks & laybys	Community Asset
Pipers Grove Car park, Snowhill	Car Parks & laybys	Community Asset
Lancaster Road residents parking, Tewkesbury	Car Parks & laybys	Community Asset
Ancilliary Car Park Lankett Lane, Tewkesbury	Car Parks & laybys	Operational
Tudor Place Laybys, Tewkesbury	Car Parks & laybys	Community Asset
Trent Road Laybys, Brockworth	Car Parks & laybys	Community Asset
Tamar Road Laybys, Brockworth	Car Parks & laybys	Community Asset
Clyde Road Laybys, Brockworth	Car Parks & laybys	Community Asset
Lower Lode Lane Depot, Tewkesbury	Depot	Operational
Council Offices, Tewkesbury	Operational Buildings	Community Asset
The Old Hat Shop, Tewkesbury	Operational Buildings	Community Asset
Tewkesbury Bowling Club	Operational Buildings	Community Asset
Lease of office space at Court Road, Brockworth	Operational Building	Community Asset
Land to the rear of the Royal Oak Public House, Church Road, Bishops Cleeve	Car Parks & laybys	Community Asset
Lease of Lassington Woods	Open space	Community Asset
Lease of land for Bishops Walk car park	Car Parks & laybys	Operational
Cleeve Hill Golf Club	Investment Property	Investment Asset

Land surrounding Tewkesbury Cricket Club	Operational land	Community Asset
Unit 1 Tweed Road Clevedon	Investment Property	Investment Asset
Unit 2 Tweed Road Clevedon	Investment Property	Investment Asset
M.A.F.F. Depot LAND	Investment Property	Investment Asset
Challenge House	Investment Property	Investment Asset
Cascades Pool land, Tewkesbury	Investment Property	Investment Asset
The Chase (Hertford)	Investment Property	Investment Asset
SPL House (Ellesmere Port)	Investment Property	Investment Asset
Wickes (Trowbridge)	Investment Property	Investment Asset
Edmund House (Leamington Spa)	Investment Property	Investment Asset
Walton on the Naze (M&S) I	Investment Property	Investment Asset
Vaughan Park Units 1-5 (Tipton) I	Investment Property	Investment Asset
Volvo Car UK Ltd, 1 Gatwick Road (Crawley)	(Crawley) Investment Property	Investment Asset
Tirley Pump Station Flood Pumps	Flood Pumps	Operational
Deerhurst Pump Station Flood Pumps	Flood Pumps	Operational

- 2.41 A number of further sites are contained within TBCs Strategic Asset Management Plan, but these are either existing open space or play area sites already considered within the Open Space Assessment section of the UCS, therefore they are not listed in table 10.
- 2.42 TBCs Property & Asset Management team were consulted during the 2023/2024 Call for Sites process and no sites were submitted for potential dwellings beyond any sites that had already been submitted for consideration within the HELAA. The team were also engaged in the UCS analysis process and highlighted that the MAFF depot site could be assessed for housing, although the site has specific restrictions that would need to be considered before progressing. In addition, they confirmed that the Cascades pool land at Spring Gardens, is already being assessed as part of the larger Tewkesbury Centre Town regeneration project. These sites have already been taken into account within this report. They also established that a further site at Dispenser Road (a former garage site) is now vacant land available for redevelopment. A conservative estimate as to the extent of capacity available at this time from council assets and to avoid double counting is approximately **5 dwellings** but this will be reviewed periodically.

C. Other publicly owned sites

- 2.43 Through both the SLP Regulation 18⁷ consultation and direct contact via the UCS study, CBC consulted public bodies including the NHS, police, County Council and Network Rail. This sparked discussions and highlighted awareness to the public bodies to better understand the SLP process and how their assets could feed in. When these organisations periodically undertake their own asset management reviews, they will now endeavour to contact the SLP to enable consideration for housing if they wish to repurpose or dispose of any of their assets in the future. However, at this present time the public bodies did not submit any sites for consideration and therefore it is considered, for the purposes of the UCS that **there is no urban capacity potential to be realised from other publicly owned sites.**

D. Other Officer and Member identified sites

- 2.44 Appropriate council officers and all the Boroughs elected Members were consulted through the SLP Regulation 18 consultation which included a 'Call for Sites' providing the opportunity for officers and members to suggest a site for consideration. No formal responses were received through this process, however, the SLP team also provided another direct opportunity through a more targeted approach. Presentations were given to Tewkesbury's Planning Policy Reference Panel (PPRP) and the Joint Planning Policy Reference Panel/Working Group (Joint MWG/PPRP) comprising Members from all 3 LPAs with information subsequently emailed to each Member and all relevant Town and Parish Council's in built up areas across the SLP area, giving them the opportunity to submit a site for further analysis through an interactive form. In addition, the Planning Policy Team are regularly involved in discussions with other officer groups where potential site opportunities are discussed.
- 2.45 The following sites in Table 10 are sites which have been identified through these groups. It is noted below if they are sites that are already within the system i.e. in the HELAA, BLR or allocated.

Table 10: Other potential sites

Other Potential Sites		
Site	Notes	Potential Capacity
UCS-TE01 - The old Cascades site, Tewkesbury	This site already features as a larger land parcel within the HELAA (Tewk017). It is also encompassed within the Spring Gardens allocation within the Local Plan (Tew3) and will be reassessed accordingly.	Already counted in table 3.
UCS-TE02 - Healings Mill, Tewkesbury	This site already largely features within the HELAA (Tewk004) and is an allocation within the Local Plan (Tew4). Therefore, it will be reassessed accordingly.	Already counted in table 3.

⁷ » [Consultations](#)

UCS-TE03 - MAFF site, off Station Road, Tewkesbury	This site already features on the BLR and was previously submitted as a HELAA site (Tewk016). It will be re-added into the HELAA to be assessed for its housing potential.	Already counted in table 6.
UCS-TE04 - Garage site opposite 36 Queens Road, Tewkesbury	These are a row of unoccupied garages that sit within the high-risk flood zone and as such even if houses were built above them there would be a risk to occupants of being stranded in times of flood. They are also not of a size sufficient to be considered within the UCS or HELAA.	Not suitable for UCS consideration.
UCS-TE05 - Vacant pockets of land in Priors Park (between Despenser Road, Foresters Road and Clarence Road), Tewkesbury	These are small pockets of land between houses that are not of a size sufficient to be considered within the UCS or HELAA. However, they may come forward as windfall sites in the future.	Not suitable for UCS consideration.
UCS-TE06 - Land currently occupied by Gloucestershire Airport, Tewkesbury	Northern part of site is within the HELAA (submitted by Gloucestershire Airport Ltd). The site is currently being marketed to continue in its current use and not for any other type of development.	Not available for housing at this present time.

E. Windfall

- 2.46 The Council have also included an allowance for small windfall sites. This is based on an analysis of historic windfall delivery since 2017/18. Table 11 below shows that over that period, there was a total windfall delivery of 272 dwellings (net). This is the windfall allowance for the 5-Year Housing Land Supply calculation for 2023/24 but it will change every year because a new average would be taken.
- 2.47 It is assumed that small sites with planning permission will be delivered within two years. The Councils have adopted a conservative approach and therefore windfall does not contribute until years three to five. This approach to windfall was established through the JCS examination.

Table 11: Net dwellings complete on sites delivering 4 or fewer units since the Plan Period began

Net dwellings complete on sites delivering 4 or fewer units since the Plan Period began

2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	Total
56	70	25	32	37	33	19	272

F. Regulation 18 SLP sites

- 2.48 A formal call for sites was undertaken during the Regulation 18 consultation process to allow interested parties to submit a site for consideration and assessment to help meet the housing need.
- 2.49 A wide range of stakeholders were contacted during this process. 40 sites were submitted that have not previously been submitted to the LPAs and these will now be added to the existing HELAA database for further consideration. Of these only 4 sites were considered appropriate to assess through the UCS process (within urban areas and/or previously developed land) and are set out in table 12 below.
- 2.50 Please note that a sites inclusion within the HELAA does not indicate that planning permission would be granted at a later date. The HELAA considers sites at high-level only and does not go into the level of detail that would be required to allocate a site or grant a permission.

Table 12: Potential HELAA sites submitted through the regulation 18 consultation

Potential HELAA sites submitted through the regulation 18 consultation				
Site Ref	Address	Gross Site Area (ha)	Details	Potential capacity
BRO013	Land at Witcombe, Brockworth	6.03	Approximately half of the site comprises previously developed land. Will need to consider Green Belt / Flood risk implications through assessment.	Net site area is 3.79ha x 40 = 151 dwellings
CHU039	Gloucestershire Airport, Staverton	15.4	Northern parcel of airport being promoted for commercial uses, not residential.	0
DOW010	Land at Ashville Business Park off	16.01	Site is partially previously developed. It is	0

	Down Hatherley Lane		being promoted for an expansion of the existing business park with retained health facility and relocation of sports facilities to accommodate expansion, not promoted for residential uses.	
TEWK019	Land at Tewkesbury Garden Centre	1.5	Primarily promoted as housing for the elderly. Largely brownfield land.	Net site area is 1.24ha x 40 = 49 dwellings
Total				200

Totals for Part 2

2.51 The total urban capacity from potential sources of supply in Tewkesbury Borough is highlighted in table 13 below.

Table 13: Totals for Part 2 - potential sources of supply

Totals for Part 2 potential sources of supply	
Supply element	Indicative dwellings
A. Housing Strategy opportunities including long term vacant properties	0
B. Tewkesbury Borough Council owned sites	Approximately 5
C. Other publicly owned sites	0
D. Other officer and member identified sites	0
E. Town centre repurposing	0
F. Repurposing / redevelopment existing sites	0
G. Windfall	272
H. SLP Call for sites	200
Total	477

3. PART 3: CAPACITY AND DENSITY

- 3.1 Following the 'brownfield first' principle, the adopted Tewkesbury plan contains objectives based on the JCS Strategic Objective 6 – 'Meeting the challenges of climate change'. This objective calls to: *"make the fullest contribution possible to the mitigation of, and adaptation to, climate change and the transition to a low-carbon economy, by making the best use of land, by maximising the use of previously developed land and encouraging higher-density developments in central locations, whilst promoting food security by protecting the highest-grade agricultural land and allotments"*; (JCS, p. 14). Tewkesbury's own objective 7 'Conserving and enhancing the built and natural environment' includes *"making the most effective use of land by giving priority to brownfield sites where available ..."*.
- 3.2 In terms of density, policy SD4: 'Design Requirements' of the JCS states that developments: *"(... should be of a scale, type, density and materials appropriate to the site and its setting."* (p.41). Further explanation is provided for layout considering assessing sites based on *"the urban grain (the pattern and density of routes, street blocks, plots, spaces and buildings of a locality) and topography of an area"*; (p. 45).
- 3.3 Similarly, policy SD10: 'Residential Developments' of the JCS states that: *"residential development should seek to achieve the maximum density compatible with good design, the protection of heritage assets, local amenity, the character and quality of the local environment, and the safety and convenience of the local and strategic road network"*. (p. 61) and paragraph 4.10.6 provides further explanation stating that: *"careful and innovative design is the key to achieving the highest appropriate density in a particular location. A proposal which would harm the character of a neighbourhood or site through excessive density, poor design or inadequate open space will not be acceptable"*. (p. 62).
- 3.4 In addition, within TBC's adopted plan a number of allocations are supported by site specific policies to provide further detailed guidance on the development of these sites which form part of policy RES1: 'Housing Site Allocations'. In all cases development must comply with the relevant criteria set out at Policy RES5: 'New Housing Development' in addition to any site-specific requirements. RES5 requires development to: *"be of a design and layout that respects the character, appearance and amenity of the surrounding area and is capable of being well integrated within it"* and *"where an edge of settlement site is proposed, respect the form of the settlement and its landscape setting, not appear as an unacceptable intrusion into the countryside and retain a sense of transition between the settlement and open countryside"*. Density considerations in Tewkesbury Borough are considered under the context of both the strategic policies in the JCS and those more detailed policies in the TBC adopted plan.
- 3.5 Apart from identifying more sites and opportunities from all parts of Tewkesbury, clearly another way in which urban capacity could be increased is through increasing densities on windfall development as well as allocated sites. This is an approach which the NPPF encourages in paragraphs 129 and 130.

- 3.6 In assessing HELAA sites, Tewkesbury, along with Cheltenham and Gloucester, will use the joint HELAA methodology which is based on the standard methodology set out in the PPG. This methodology has been updated to take into account a detailed internal work stream undertaken on densities across the SLP area and changes in legislation.

Estimating development potential

- 3.7 The PPG advises that development potential of sites should be guided by the existing or emerging planning policy, including locally determined policies on density.
- 3.8 The assessment of development potential through the HELAA methodology is based on a number of factors and the development potential within the HELAA does not in itself determine that it is suitable for development or that it should be allocated for development. The potential is indicative only and does not prejudice assessments made through the development plan or planning application process.
- 3.9 Site capacities are assessed based on evidence from promoters of sites, urban design principles and other local information. Where evidence is unavailable, individual density assumptions have been applied to each local authority. The new density categories align with the [National Model Design Code \(p. 14\)](#) (NMDC) (2021), which include 'Urban Neighbourhoods' 60 - 120 dph, and 'Suburbs' 40 - 60 dph. It is intended they are developed in more detail when the Design Code for the SLP areas is published (scheduled for 2026).
- 3.10 For Tewkesbury Borough the following densities are deemed appropriate to apply in assessing capacity:
- 60 - 120 dph for areas within 400m of a transit rail station.
 - 40 - 60 dph for all other areas
- 3.11 For the HELAA calculations the lower end of the density range is used (e.g. 60 for Urban Neighbourhoods) as a cautious approach. However, applications at the higher range of the density are encouraged in the appropriate site context (e.g. sites close to public transport links).
- 3.12 To account for a proportion of the site that will be taken up by infrastructure and landscaping, a density multiplier will be applied to achieve a net developable area based on the following assumptions set out in table 14 below.

Table 14: Density Multiplier Assumptions

Site Size (ha)	Discounted site area	Area for housing
0 - 0.4	10%	90%
0.4 - 2	17%	83%
2+	37%	63%

4. Conclusion and Next Steps

- 4.3 This study has considered potential urban capacity in the Borough of Tewkesbury taking into account both current and potential supply. It forms part of the evidence base for the SLP and the winter 2023/24 Regulation 18 Consultation.
- 4.4 This will be kept under review and updated periodically to ensure that the most up to date urban capacity is factored into the plan making process.
- 4.5 Table 15 below highlights total capacity from both current and potential sources and provides the overall urban capacity figure for Tewkesbury Borough at this time.

Table 15: Total Urban Capacity within Tewkesbury Borough

Site Source	Indicative dwellings (net capacity)
Current Supply	1,420
Potential Supply	477
Total Urban Capacity	1,897

- 4.6 Tewkesbury's current housing requirement is 617 dwellings per annum (or 12,340 dwellings over a 20 year time frame) using the Standard Method in the NPPF.
- 4.7 Even if the appropriate higher density multipliers are applied, it is clear that Tewkesbury cannot meet its housing demand by solely relying on urban land within its administrative boundary. The urban capacity identified within Tewkesbury Borough would only meet just over 15% of their overall requirement even if all current and potential sites were to come forward within the plan period.
- 4.8 Therefore, to meet Tewkesbury's housing requirements in full, further evidence is required in terms of a Green Belt Study, to understand if there are any parcels of land that could be released for development, particularly taking into consideration any 'Grey Belt' land deemed suitable to help meet the need across the SLP area. In addition, effective joint working on the SLP will need to continue under the duty to cooperate and the appropriate development strategy determined, taking into account the baseline capacity of the Tewkesbury (and Cheltenham and Gloucester) administrative boundaries, the overall conclusions set out in the joint UCS report and other pertinent evidence based workstreams.