

STROUD DISTRICT COUNCIL
COUNCIL – 19 FEBRUARY 2004
CABINET - 22 JANUARY 2004

AGENDA
ITEM NO
10(d)

Report Title	Interim Report of the Local Plan Inspector on Policy H1, site Hg1, Brockworth Airfield, Upton St Leonards
Appendices	<ol style="list-style-type: none"> 1. Extracts of Inspectors main findings and his recommendations 2. Proposed revised text for Local Plan 3. Copy of report to Tewkesbury Borough Council 23 Sept 2003
Purpose of Report	<p>To consider:</p> <ol style="list-style-type: none"> a) the recommendations of the Stroud District Local Plan (SDLP) Inquiry Inspector on Policy H1, site Hg1 b) how the Council wishes to respond c) the consequent procedure to be followed
Consultation and Feedback	The objectors to the proposal in the Local Plan have been informed of the Inspectors recommendations. Consultation on the changes to policy and text will take place when the Inspectors full report has been considered and the Local Plan is proposed to be formally modified.
Decision(s)	<p>Cabinet RECOMMENDS that:</p> <ol style="list-style-type: none"> 1. Policy H1, Hg1 - the allocation of 500 houses at Brockworth Airfield, Upton St Leonards - continue to be supported in the SDLP. 2. The minor changes to the Policy and supporting text, as recommended by the Inspector (page 13 of his report), be accepted. 3. Officers continue to provide input from Stroud's perspective to a more comprehensive development brief for the area, (covering the housing, employment, district and local centres across Tewkesbury Borough and Stroud District Council's boundary). 4. Advertisement of proposed modifications be made after receipt of the Inspector's full report. 5. The revised policy and text wording in Appendix 1 to this report be adopted for development control purposes.
Financial Implications	<p>Clive Hammond Head of Accountancy and Audit Tel: 01453-754140 E-mail: clive.hammond@stroud.gov.uk The cost of this Inspectors report is contained within the budget provisions for the Local Plan Inquiry.</p>

Legal Implications	Jackie Hawken. Legal Services Manager Tel: 01453-754370 E-mail: jackie.hawken@stroud.gov.uk As stated in "Options" below. There are no immediate legal implications.
Report Author	Peter Gilbert, Planning Strategy Manager
Portfolio Holder	Cllr Mrs B Tait
Background Papers	Stroud District Local Plan, Revised Deposit as amended June 2001 Local Plan Inquiry files

Options	The Planning Inspectorate requires an indication of the Council's response to the report and, should it reject any recommendations, the reasons for that. The Council does not have to accept the Inspector's report, but there must be good reasons for taking a different view. Inadequate reasons may lay the Council open to legal challenges. The Council can resolve to approve changes in relation to this part report and the recommendations from the Inspector. Any proposed changes to the Plan must be approved by Council to carry weight in the development control process.
Performance Management Follow Up	Progress on this development will be monitored through the development control process and the annual housing land availability work of the Planning Strategy team.

Discussion

- 1) The full report of recommendations on the Stroud District Local Plan (SDLP) is not expected until January 2005. However, the Local Plan Inspector, at the Council's request, produced an early report in November 2003 of his conclusions on the strategic housing site allocation at Brockworth Airfield, Upton St Leonards (H1, site Hg1). This has been produced to be consistent with the early report of the Inspector to the Tewkesbury Borough Local Plan Inquiry on the Tewkesbury element of the overall allocation that straddles the Tewkesbury/Stroud District boundary. In her report, the Tewkesbury Inspector included her recommendations on the inter-related policies (in the Tewkesbury plan) covering the possible District Centre at the Gloucester Business Park and the local centre for the new housing.
- 2) A copy of the SDLP Inspectors interim report has been posted on the Council's website - www.stroud.gov.uk/docs/localplan/Brockworth_Report.pdf – and the objectors to the allocation in the Local Plan have been informed of the availability of the Inspectors report.
- 3) Appendix 1 to this report sets out policy H1, Hg1 and the supporting text to the allocation as proposed to be revised in the Local Plan following consideration of the Inspectors recommendations. Appendix 2 contains a copy of the report to Tewkesbury Borough Council concerning their Inspectors interim report on the Tewkesbury element of this strategic allocation.
- 4) Once the Inspectors full report has been received and considered by Council, all proposed modifications must then be advertised for public comment. It would be prudent and more efficient to advertise all proposed modifications at the same time i.e. after receipt of the Inspector's full report and consideration of his recommendations, which, on current indication from the Planning Inspectorate, would not be until early 2005.

- 5) However, the Council needs to consider its response to the recommendations. This will give an early indication of the Council's views to the site developers and other interested parties. This will allow for officers to input to the more comprehensive development brief that is recommended by the Tewkesbury Inspector and will also assist your officers in their negotiations on the current and any future planning applications.
- 6) Extracts from the Inspectors report indicating his main findings and his recommendations are given in Appendix 1. Overall he is supportive of the allocation of 500 dwellings and has not suggested any major changes to the policy or the supporting text. The changes he has recommended relate to matters of detail concerning the wording of the policy and supporting text in relation to the provisions to be sought through a section 106 agreement. It is considered that the Inspector's recommendations are reasonable and should be accepted.

Extracts from the SDLP Inspectors part-report indicating his main findings on housing allocation Hg1 in Policy H1.**Sustainability**

- From a strategic perspective, site Hg1 is a more sustainable location than the towns and villages in the District. (para 5.1.7)
- No evidence has been submitted to suggest that towns and villages in the District are unviable or under threat. (para 5.1.7)
- The proximity of the site to public transport nodes and services, both planned and existing, offers more opportunities in terms of sustainable travel choices than other locations in the District. (para 5.1.8)
- I agree with the Council that any concerns about capacity implications for the M5 should have been addressed at the time of the Structure Plan EIP. (para 5.1.8)
- The regeneration of Gloucester City Centre is unlikely to be prejudiced by the Brockworth allocation. (para 5.1.9)

Greenfield / Brownfield

- I accept the Council's explanation that it is unlikely that the south eastern part of the site (Area 'A' on the plan put in by Mr Hunt on behalf of Upton St Leonards Parish Council) was used as part of the airfield. (para 5.1.11)
- I do not regard the fact that part of the site is greenfield as being in any sense determinate of the extent of the allocation. (para 5.1.13)

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Transport

- I am satisfied that the proposal has adequately addressed the transport issues arising from the development of the site and that its location and the provisions sought provide alternative transport modes to the car and reduce the need to travel overall. (para 5.1.31)
- Regarding Lobley's Drive, the County Council, as the Highway Authority, has carried out detailed transport work, including a public consultation exercise. They have not objected to the Proposal and I am satisfied that it is satisfactory in this respect. (para 5.1.31)

Section 106

- I note that the Brief already contains detailed indicative Section 106 requirements that reflect the desires of the Councils, both jointly and as individual authorities. (para 5.1.15)
- Hg1 should set down a framework into which detailed planning obligations will fit. (para 5.1.17)
- The section of the Proposal that deals specifically with obligations sought by Stroud District Council should be deleted and the approach taken in the subsequent section that deals with provisions that will be sought in relation to the overall development should be relied upon instead. (para 5.1.17)

Affordable Housing

- I prefer the evidence put forward by the Council on the affordable housing need to that put forward on behalf of the Objectors. (para 5.1.28)

- I support the 25% figure as an appropriate starting point for negotiations. (para 5.1.29)
- I accept the Council's explanation that the 25% figure is based upon the HNS data. (para 5.1.29)

Landscape / SSSI

- I am satisfied that the objectives and interests of the AONB are adequately protected by the measures taken in the Development Brief and set down in paragraph 5.9.6(h) of the Plan. (para 5.1.34)
- Re: the extent of the footslope and the designation of the Area of High Landscape Value; The District Council has taken a consistent approach to this, and has decided not to designate the areas identified by the consultants as 'Settings'. I consider that this is in line with government guidance which advises against too many local designations, and I find its decision at Brockworth to be reasonable. (para 5.1.35)
- I am satisfied that the measures explained in paragraph 5.2 of the Development Brief and in paragraph 5.9.6h provide adequate protection for the SSSI and create an appropriate framework for its future management. (para 5.1.36)

Waste Management

- I accept that the conclusions of the Inspector's report will determine the Council's approach towards this issue. (para 5.1.37)

The Inspectors recommendations:**RECOMMENDATIONS**

- a) Modify the Proposal to include Proposed Change PRO056 with the exception that:
 - Reference to "affordable housing", "community offices", "medical and other practices", "public house", "indoor sports facility", and "within the overall development site including land within both Tewkesbury Borough and Stroud District" should be deleted from the first paragraph.
 - All reference to the provisions sought only in relation to Stroud District should be deleted.
 - The third bullet of the provisions sought in respect of the overall development site is modified to read, "initial subsidies towards maintenance of local shopping, recreation and community facilities."
- b) Modify paragraph 5.9.6e so that the sentence beginning " The Partnership.." reads "The Partnership has set a target of a least 25% of affordable housing, and this accords closely with the results of the Stroud District Housing Needs Survey. The Council will therefore seek..."
- c) Modify the reasoned justification to include PRO065 with the exception that the fifth and sixth sentences that refer to "pavilions" and an "indoor local sports facility" should be deleted.
- d) Modify paragraph 5.9.6k so that all of the text after the first two sentences is deleted, and then the following two sentences are added: "The development will require new two-three form entry infant and junior schools within it. The County Council has advised that it will also require contributions towards new secondary education provision off site."
- e) Modify the reasoned justification in accordance with Proposed Change PRO067.

- f) Ensure that the text of the reasoned justification reflects the status of the Design Brief and make any consequential changes in the light of my other recommendations.
- g) Make no further modifications in response to the objections.

Brockworth Airfield Allocation (Hg1)

Policy and Text as proposed to be modified in the Stroud District Local Plan following the LPI Inspectors report of November 2003.

The text shown is that as amended by the RLP version of the Plan, Pre-inquiry Changes or Proposed Changes as appropriate. Proposed modifications to this are indicated by ~~Strikethrough~~ **bold** text for deleted wording and **bold** text for new wording.

PROPOSAL H1

The following sites are allocated for development in each case including residential development. Prior to the grant of any planning permission for development on any of these sites, a development brief must have been prepared and approved by the District Council. The brief should include an analysis of the site and its surroundings, establish the local context for the development of the site and include an accessibility profile of the site. The completion of a Section 106 Legal Agreement will be sought, or conditions used, for each development in order to secure the provisions listed under each site and any others that arise through consideration of planning applications that are considered reasonable and relevant to secure a satisfactory development.

Land at the former airfield, south of the Gloucester Trading Estate, and east of the M5, at Brockworth (Hg1)
(Approximately 20 hectares)

Residential development, ~~including affordable housing~~, with associated community facilities and services, ~~community offices, medical and other practices, public house, indoor sports facility~~ and public open space ~~within the overall development site including land within both Tewkesbury Borough and Stroud District.~~
Indicative capacity of 500 dwellings within Stroud District.

~~In addition the following provisions will be sought in relation to that part of the site within Stroud District:-~~

- ~~• Provision of allotments on site.~~
- ~~• Provision of community composting site.~~
- ~~• Incorporation of the principles of best practice in sustainable building design and construction.~~

In relation to the overall development site, incorporating land within both Tewkesbury Borough and Stroud District the following provisions will be sought:

- Ensuring, an initial subsidy of, bus services between the site and Gloucester and Cheltenham.
- Maintenance of public open spaces
- Initial subsidies towards ~~the~~ **the** maintenance of local shopping, **recreation and community** facilities, ~~community centre, community offices, medical and other practices, and indoor sports facility.~~
- Provision of new infant and junior schools and contributions towards secondary education provision.
- Contributions towards off-site highway works.
- Provision of pedestrian and cycle routes within the site and contributions towards connections off-site.

Land at the former airfield, south of the Gloucester Trading Estate, and east of the M5, at Brockworth (Hg1)

5.9.6a. This site forms part of a larger allocation within Tewkesbury Borough Council's administrative area. It is intended to produce a joint master plan and development brief for the site overall to ensure the whole area is developed in a co-ordinated manner, the necessary public facilities and services are provided, and the resultant development is cohesive and creates a balanced community. The master plan and development brief, and any other relevant publications such as a design code, will be adopted by this Council as Supplementary Planning Guidance in due course. The scale of the development proposed is considered sufficient to create a

largely self-contained new community. It will also bring, or contribute to, significant benefits to the existing community through, for example, improved social infrastructure such as public transport and local leisure facilities.

5.9.6b. Phasing - The development of this site should be phased, in conjunction with the development of the adjoining land within Tewkesbury Borough. Further advice on this subject is contained within the Phasing Section later in this chapter.

5.9.6c. Form and Layout - The development brief should include a design/development strategy. This should reflect the advice contained in 'Places, Streets and Movement' (DETR-1998), By Design (DETR-2000) and the District Council's adopted Residential Design Guide. The development brief will determine the location of services and facilities with the site overall. Given the scale of the development, the aim should be to create a series of varied and interesting areas, each with their own identity and sense of place. Suburban development typical of the 1980s and early 1990s will not be acceptable. Innovation can be encouraged on this site. Each phase of the site should contain a mix of unit sizes. The layout should promote the use of transport modes other than the car, give priority to pedestrian movement within the site and establish clear linkages to the key facilities within it. The concept of home zones should also be incorporated in the scheme, as this will assist in creating a 'people-friendly' environment. Convenient public transport and cycle links within the site and to the wider area should be provided at the earliest opportunity to encourage the use of these modes by residents at the outset.

5.9.6d. Density - The density should vary through the site, and this should be reflected in the development brief. Areas of high density (up to 50 dwellings per hectare) are appropriate in the core areas of the development adjacent to the community facilities and services and along public transport routes. The aim should be to create interesting areas of built form, linked by substantial areas of open space, rather than large areas at a medium density (25 dwellings

per hectare). A broad mix of units, in terms of household size, type and tenure, is recognised as one means of securing social mix. Housing mix should be applied at street level to encourage activity in streets at all times and a sense of neighbourliness. The Council will expect the development to incorporate units to cater for the full range of housing needs and create a balanced community.

5.9.6e. Affordable Housing - In response to Regional Housing Policy Guidance issued by the Government Office and the Housing Corporation, the Council has established a Multi-District Joint Commissioning Partnership with Gloucester City Council and Tewkesbury Borough Council. The Partnership has secured Strategic Funding to provide sustainable new affordable housing to meet identified housing needs in the wider Gloucester area over the 10 year period of 2001-2011, on the major development sites where the boundaries of the three authorities meet. The Partnership has set a target of at least 25% of affordable housing **and this accords closely with the results of the Stroud District Housing Needs Survey.** ~~and~~ The Council will therefore seek at least 125 units of affordable housing within the Plan period. A variety of tenures will be required to address varying levels of affordability. There are greater opportunities to buy relatively inexpensive open market housing in the Hucclecote/Brockworth areas, and strategic demand suggests a need for at least 93 units for rent, with the remainder for subsidised low-cost home ownership, including shared ownership. The affordable housing should be distributed throughout each phase of the development and integrated within the open market housing, rather than being concentrated in discrete areas, to promote social mix.

5.9.6f. Access The principal accesses to the site should be from the adjacent Arlington site and Lobley's Drive. Access via Cranham Gate should also be provided, but viewed as a secondary link where the objective is to encourage integration of existing residents nearby with the new community. Within the site, all roads other than the main distributor road that will serve as the main public

transport route should be designed so that traffic calming is provided by narrow width, tight bends and restricted visibility, rather than by add-on features such as speed humps. Roads, footpaths and cycleways should be laid out to enable travel through the site as much as possible, and culs-de-sac should be avoided. Safe and convenient pedestrian and cycle routes should be provided linking the development to facilities provided within the site, and to existing employment premises, shops, schools and other facilities beyond it.

5.9.6g. Transportation – The provision of a range of alternative transport modes to the car early in the development is a key component. The overall development will require the production of a Transportation Assessment that will address bus and car travel, cycling and walking. The Council will expect the development to reinforce existing, and establish, new connections to the surrounding areas, particularly for public transport, cycling and walking. Also, the site overall should have good permeability from all points to ensure cycling and walking are attractive to future residents, particularly to community facilities and services. Bus services through the site should be provided very early in the development, and it is anticipated that these will need to be subsidised initially until they are commercially viable. These should link the site with Gloucester City and Cheltenham. Contributions towards other off-site highway requirements required to facilitate the development should also be made.

5.9.6h. Landscape - The landscaping of the site should determine the form of the development, and not the other way round. Particular care needs to be taken to minimise the impact of the development on views from the Cotswold escarpment within the AONB. Development to the boundary of the site is not considered appropriate, and the Council will expect the edge of the site that abuts the AONB to be treated sensitively with lower density development, interspersed with public open space allowing views across it to the AONB from public spaces. The interface between the site and the Arlington development also requires careful treatment, and there is an opportunity to create a new

public space along this edge, based on the re-opening of the culverted Wotton Brook. A buffer zone should be incorporated between the site and the adjoining SSSI, and development should be laid out in such a way as to discourage access to the SSSI.

5.9.6i. Archaeology - There are no recorded archaeological sites within this allocation, but there is evidence of a Roman settlement and field system to the west. An archaeological evaluation will be required before a definite assessment of archaeological potential can be made.

5.9.6j. Recreation – The development is of sufficient size to provide a full range of outdoor play facilities for its residents within the site. Public Open Space should be provided in accordance with Policy R5 of this Plan. Facilities should include sports pitches and local play areas. Open spaces should be conveniently located to the core areas of the development to allow residents to access them quickly and safely by foot or cycle, for both casual recreation and formal pursuits.

~~Ancillary facilities such as pavilions will be required. An indoor local sports facility to cater for a range of activities should also be provided within the development overall.~~

5.9.6k. Community Facilities – The Council wishes Brockworth to provide a full range of facilities to meet residents' everyday needs and encourage a sense of community. It is envisaged these facilities will be distributed within streets and blocks throughout the site, rather than being concentrated on one site only, as this will assist in creating a balanced community, reinforcing permeability and legibility of the site and creating a mix of uses in the principal areas across the site. **The development will require new two-hree form entry infant and junior schools within it. The County Council has advised that it will also require contributions towards new secondary education provision off site. A multi-purpose community hall should be provided on the site. This building should cater for use by a range of community groups such as local sports clubs, youth clubs, mothers' groups and elderly groups. Facilities for community cultural**

~~expression including exhibition and/or performing space should also be incorporated. It is also envisaged that other community facilities, such as meeting rooms and offices will be provided elsewhere in the development. Extra parish council office space or facilities to serve the increased population of Upton St Leonards Parish may be required in the village. The development will require new, two-three form entry infant and junior schools within it. The County Council has advised that it will require contributions towards new secondary education provision off-site also. As Brockworth will generate more than 1,000 residents, it should include workshop/studio spaces with living space for those employed in the arts and crafts industries. Due to the nature of these activities, their distribution within streets and blocks with other uses, rather than solely being located in separate, discrete areas, is appropriate.~~

targets for dealing with these matters, and sets targets to recycle or compost at least 25% of household waste by 2005, 30% by 2010; and 33% by 2015. One simple way of helping to achieve these targets is for new housing developments to provide a composting bin in gardens. The Plan also seeks the inclusion of a community composting site within the Brockworth allocation, to cater for additional green waste produced by the new residents.

5.9.6l. Sustainability – The Council is committed to encouraging developments in its District generally to embrace the best practices of sustainable design and building. It expects Brockworth to adopt the most up to date practices, for example, the incorporation of Sustainable Urban Drainage Systems (SUDS), energy efficiency in site layout and design, locally sourced, recycled and eco-efficient building materials, noise and heat insulations, efficient central heating systems and water efficiency inside and outside the house. The Council is aware of the Building Research Establishment Ecohomes: The Environmental Rating for Homes. The rating considers the broad environmental concerns of climate change, resource use and impact on wildlife, but balances these against the needs for a high quality, safe and healthy internal environment. The Council will look to developers to incorporate these measures within their schemes with the aim of achieving the ‘good’ rating at least..

5.9.6m. There is a growing emphasis from Central Government on recycling and diversion of biodegradable waste from landfill sites. The DETR has produced a Draft Waste Strategy (July 2000) which identifies revised

Copy of Report to Tewkesbury Borough Council

Report to:	Environment Committee
Date of Meeting:	23 rd September 2003
Subject:	Interim Report of the Local Plan Inspector on Policies BR1, 2 and 3 in Brockworth/Hucclecote
Report of:	Director of Planning & Development Services

Purpose of Report: To consider the recommendations of the Local Plan Inspector on policies BR1, 2 and 3, how the Council wishes to respond and the consequent procedure to be followed

1.0 INTRODUCTION/BACKGROUND

1.1 The full report of recommendations on the Tewkesbury Borough Local Plan (TBLP) is not expected until December 2003. The Local Plan Inspector, at the Council's request, produced an early report in July of her conclusions on the strategic housing site allocation at Brockworth/Hucclecote (BR1). She included, although not originally requested, her recommendations on the inter-related policies BR2 (Gloucester Business Park – possible District Centre) and BR3 (local centre for the new housing). Members have already received a copy of the interim report but it is attached as Appendix 1, for ease of reference. Appendix 2 sets out policies BR1, 2 and 3 in the Revised Deposit version of the Plan.

1.2 The Council has to consider its response to the recommendations (otherwise an early report would not have been worthwhile). The Inspectorate has requested an indication of the response and reasons for rejecting any recommendations. This is not to say that the Council has to accept the Inspector's report, simply that there must be good reasons for taking a different view.

1.3 Council must approve any proposed changes to the Plan. All proposed modifications must then be advertised for public comment. The Council can resolve to approve changes at this stage to those policies the subject of recommendations from the Inspector, to give an early indication of support to developers and allow for preparation of the comprehensive development brief that is recommended before any applications can be considered. It would be prudent and more efficient, however, to advertise all proposed modifications at the same time i.e. after receipt of the Inspector's full report and consideration of her recommendations, which would not be until early 2004.

2.0 HOUSING – BR1

2.1 There were five main sets of objections to the policy, either heard at the Inquiry or made in writing. The Inspector's conclusions were as follows:

2.2 *Loss of employment land: (paras 2.11.3 to 2.11.6):* no substantive evidence that the remaining area of the Business Park would be insufficient for long-term needs, or

undermine the Regional Planning Guidance (RPG) or Structure Plan Second Review (SPSR) strategy.

2.3 *Effect on nature conservation interests: (paras 2.11.7 to 2.11.12):*

(a) no adverse impact on the SSSI; mitigation measures such as footpath diversion, improved management of the SSSI, creation of buffer zone are sufficient and the sorting out of their implementation is well advanced.

(b) no reason to reduce the housing area by the Key Wildlife Site (veteran oaks, fungi, beetles and barn owls) due to the proposed dedication of an off-site breeding and foraging area for the owls, which includes further mature oaks.

2.4 *Size and density of development: (paras 2.11.13 to 2.11.23):*

a) both Stroud and Tewkesbury's areas should be included within the density calculations; the net density of 40 dwellings per hectare is compatible with government advice.

b) no conflict with SPSR policy H5, which is not explicit about density; in its favour the site has the potential to become a sustainable neighbourhood, it is on the edge of a Principal Urban Area (PUA), is next door to a regionally significant business park, public transport improvements are proposed, as are local centre facilities. Higher density here (compared with other TBLP sites) would be efficient use of land.

c) a range of densities would help to create an attractive variety of design; higher density does not necessarily mean poor design.

d) the effect on the adjoining AONB would be better than with the existing employment permission, with a greater potential for an integrated landscape approach respecting the AONB; the landscape proposals as currently outlined are supported.

e) no concerns about the marketability of the site within the Plan period due to a good mix of house types, support from house builders, and the prospect of up to four developers working at a time; the Plan, Monitor and Manage approach also ensures adjustment of housing site release, or a plan review, if required.

2.5 *Affordable housing (paras 2.11.24 to 2.11.27):*

a) some modifications to overall policy on affordable housing (HSG21) will be proposed (not yet available); meanwhile some adjustments to BR1 are suggested to make it less prescriptive: in the policy the Council should seek to negotiate the provision of affordable housing), not prescribe its provision; in the reasoned justification (RJ) "sought" should replace "required" and the sentence seeking to prescribe tenure split should be deleted.

b) there is sufficient evidence to conclude that a target of 25% affordable housing within the overall figure is the right starting point for negotiations, but the precise figure of 350 is questioned; the policy should reflect this and the RJ should be changed to make clear the actual number would be based on an up-to-date assessment of local needs.

2.6 *Sustainability and accessibility (paras 2.11.28 to 2.11.30):*

- a) the road safety improvements and public transport measures proposed (rather than highway capacity improvements) suggest a satisfactory solution to increased traffic; reference to the Transport Assessment should be made in the RJ.
- b) proximity to the motorway junction (encouraging more car use) is outweighed by the potential for public transport and the number of facilities proposed within walking distance. "The sustainability credentials of the Brockworth site are unlikely to be surpassed".

2.7 *Other matters (paras 2.11.31 to 2.11.35):*

- a) the site would not compete so directly with Gloucester's Western Waterfront development as to reduce the latter's prospects for regeneration.
- b) there should be some flexibility in the policy so that facilities could be in either administrative area (Stroud or Tewkesbury).
- c) in line with the recommendation for a new district centre within the Business Park, the new local centre (previously Policy BR3) should be referred to in the RJ to BR1 as a strictly local facility of limited scale.
- d) the requirement for any application to comply with a development brief is thought more appropriate for the RJ; a design and development brief should, however, cover not just the housing area and local centre, but also the Business Park and district centre, to be prepared in consultation with interested parties and to be taken into account as a material consideration in determining planning applications.

2.8 *Inspector's recommendations (para 2.11.36):*

These are clearly set out, for both policy and RJ, in Appendix 1.

3.0 **RECOMMENDATIONS FOR POLICY BR1**

3.1 The Inspector has resoundingly endorsed the Council's key housing site, both the principle and the majority of the details. The minor changes to the policy and RJ are well argued (in some cases accepted by the Council at the Inquiry) and sufficiently close to TBC's position that their support should be recommended.

3.2 The affordable housing modification ((f) (g)) is slightly difficult to assess, without the context of suggested changes to the parent HSG21 policy, but what is proposed here is in line with the Council's approach, particularly the reliance on an up to date assessment of local need. Certainly, the developers' suggested reduction has been comprehensively rejected.

3.3 It is suggested that Members **RECOMMEND** that:

- a) Policy BR1, the allocation of 1400 houses at Brockworth/Hucclecote, continue to be supported in the TBLP.
- b) The minor changes to the Policy, as recommended by the Inspector and as set out in her paragraph 2.11.36, be accepted.
- c) Work proceeds on a comprehensive development brief for the area including the

housing site.

- d) Advertisement of proposed modifications continue after receipt of the Inspector's full report.

4.0 GLOUCESTER BUSINESS PARK AND BROCKWORTH/HUCCLECOTE LOCAL CENTRE (POLICIES BR2 & 3)

4.1 Although the Draft Local Plan included a proposal within the former policy EMP8 for a single food store on the Business Park, the Revised Deposit version (see Appendix 2) removed this. Neither version referred to a district centre, although an early version of a development brief for the area, known as the Framework document (to which the Inspector makes reference), anticipated additional facilities on the Park, including leisure and some further small retail uses. Only a small scale local centre was proposed in or adjacent to the housing in the Revised Plan. The proposal for a hotel was continued from the Draft to the Revised Deposit version.

4.2 Lobleys Drive link, from the Hucclecote side of the M5 to Abbeymead, was anticipated in the TBLP to be for public transport, bicycles and pedestrians only.

4.3 Objections were considered by the Inspector for the reinstatement of the store, for the inclusion of a district centre and for the use of Lobleys Drive by cars.

4.4 *The Inspector's conclusions are set out in Appendix 1 (paras 2.12.1 to 2.12.26):*

- a) The policy direction of the SPSR is to integrate the Business Park and the Brockworth/Hucclecote urban extension into the local area, improving existing facilities.
- b) retail evidence provided supports a quantitative need for a new food store of about 3250 sq.m. net, plus other shops of about 2375 sq.m. gross at 2006 alone, before allowing for any expenditure from the Business Park employees (10,000 or so) and without estimating up to 2011.
- c) effects on local shops would be more than compensated for by expenditure growth and their largely top-up role would not be jeopardised.
- d) other large stores in the vicinity (Abbeydale and Up Hatherley) would feel some impact but not sufficient to affect their overall viability or the vitality of the centres which they anchor. Other stores at Barnwood and Bruton Way might be more affected but they are already in out of centre locations.
- e) a quantitative need for new comparison goods floorspace in the district centre is justified by forecast expenditure growth.
- f) there is also a qualitative need for improved shopping facilities in the area, without having to drive elsewhere; from consideration of the emerging Gloucester City Local Plan the proposals would be compatible with the City's retail hierarchy.
- g) the proposed store and district centre would support, within walking distance, services and occupiers on the Business Park, typical of a Third Generation park.
- h) leisure facilities would make good a local deficit; there is a quantitative and qualitative case for more, whilst complementing existing facilities.

- i) the district centre would meet local needs (eg. jobs, training, leisure, affordable housing) and create a balanced and sustainable community.
- j) the evidence provided on the sequential test has considerable force; other local centres have limited capacity; there is benefit in maximising the opportunities for linked trips to a cluster of facilities; Plot 5000, rather than elsewhere in the overall development area, has most potential to integrate existing and new communities and for public transport accessibility.
- k) despite local concerns about traffic impact, the existing permission for B1 uses could generate more car trips; the transport assessments done so far suggest there is local capacity; the proposal would reduce the need to travel both locally and to more distant stores; public transport can be maximised; and therefore there would be overall benefit to the community and a more sustainable outcome.
- l) BR2 and 3 and the Proposals Map should be modified to include the new store and district centre but a small centre within the BR1 housing is still compatible, as a strictly local facility, so BR1 (housing) should include a reference to it (see para 2.7 above); BR2 should deal with the Business Park alone; BR3 should cover the district centre, store and hotel.
- m) it is no longer appropriate to retain reference to the Aviation Museum.
- n) as the County Council has determined, following consultation, that the Lobleys link should include cars, but with a signal-controlled priority for buses, this should be accepted.
- o) as in BR1, there should be reference in the RJ, rather than the policy, to the need for a brief for the overall area, to be prepared in consultation with interested parties and to be taken into account as a material consideration in the determination of planning applications.

4.5 *Inspector's Recommendations*

These are set out in Appendix 1, para 2.12.27. Again, they are clear and comprehensive, addressing not only points made by objectors seeking reinstatement of parts of the policy but, perhaps more tellingly, points originally made by TBC when the draft policy was prepared. It was difficult to adduce evidence at the Inquiry to rebut the evidence provided and it remains so. Whilst there will remain concerns from local residents as to perception of increased impact, particularly traffic, on their area (which were expressed by TBC at the Inquiry), the Inspector is quite clear that the perceptions cannot be substantiated by fact, taking into account national, regional and county planning guidance.

5.0 **RECOMMENDATION FOR POLICIES BR2 AND 3**

It is suggested that Members **RECOMMEND** that:

- a) the Inspector's recommendations for BR2 and BR3 as set out in her para 2.12.27 be accepted.
- b) Work proceeds on a comprehensive development brief for the overall area of BR1, 2 and 3

- c) The proposed modifications be included in the overall advertisement for the Plan after receipt of the Inspector's full report.

Background Papers:

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