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Mr David Hagg
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Your Ref:

Our Ref: PINSM/C1625/429/1

Date: November 2003

Dear Sir

STROUD DISTRICT LOCAL PLAN TO 2011 REPORT OF PUBLIC LOCAL INQUIRY INTO OBJECTIONS

I refer to the above inquiry which opened on 15 January 2002 and closed on 3 June 2003. The Council has indicated that an early report of my conclusions in respect of the objections to the strategic site allocation at the former Brockworth Airfield (Policy H1 [Hg1]) would be helpful. I am pleased to attach my part-report that deals with this matter.

As the Council is aware, Ms Mary Travers, the Inspector appointed to hold the public local inquiry into objections to the Tewkesbury Borough Local Plan, has also been appointed as Assistant Inspector to the Stroud District Local Plan inquiry. This has ensured a common understanding and a consistent approach to the issues raised by the objections to this strategic site which overlaps the administrative boundaries.

All of the matters raised in the objections, supporting representations and the Council's rebuttal evidence have been taken into account, but my recommendations follow primarily from the key points and considerations dealt with in my conclusions.

The paragraph numbering of this part-report does not correspond with that anticipated for this section of the final report. I anticipate that it will be section 5.15 in my full report.

Yours faithfully

TERRENCE KEMMANN-LANE DipTP FRTPI MCIM
Inspector

5.1 POLICY H1 - SITE Hg1

The Objections

H01 (Hg1)/1/0067	Gloucestershire County Council
H01 (Hg1)/1/0068	Gloucestershire County Council
H01 (Hg1)/111/0334	Councillor M Beard
H01 (Hg1)/111/3060	Councillor M Beard
H01 (Hg1)/111/3061	Councillor M Beard
H01 (Hg1)/111/3062	Councillor M Beard
H01 (Hg1)/111/3063	Councillor M Beard
H01 (Hg1)/121/0350	Upton's Community Action Network
H01 (Hg1)/230/0595	Hallam Land Management Ltd
H01 (Hg1)/230/0605	Hallam Land Management Ltd
H01 (Hg1)/237/0650	H Burcombe & Son
H01 (Hg1)/299/0807	Gloucester City Council
H01 (Hg1)/315/0902	Bloor Homes
H01 (Hg1)/354/1158	The National Trust
H01 (Hg1)/392/1279	Bovis Homes & Westbury Homes
H01 (Hg1)/392/3367	Bovis Homes & Westbury Homes
H01 (Hg1)/392/3368	Bovis Homes & Westbury Homes
H01 (Hg1)/393/1286	Orchard Trust
H01 (Hg1)/423/1538	Tewkesbury Borough Council
H01 (Hg1)/424/1583	Stroud & Gloucestershire Green Party
H01 (Hg1)/433/1779	Berkeley Strategic Land Limited
H01 (Hg1)/475/2036	Nigel Cant
H01 (Hg1)/575/2485	Arlington Property Developments Ltd
H01 (Hg1)/98/0304	Upton St Leonards Parish Council
H01 (Hg1)/98/3055	Upton St Leonards Parish Council
H01 (Hg1)/234/0629	David Wilson Homes South West
H01 (Hg1)/98/0305	Upton St Leonards Parish Council
H01 (Hg1)/299/0808	Gloucester City Council
H01 (Hg1)/575/2487	Arlington Property Developments Ltd
H01 (Hg1)/111/3064	Councillor M Beard
H01 (Hg1)/408/3414	Hardwicke Court Estate
H01 (Hg1)/575/3845	Arlington Property Developments Ltd
H01 (Hg1)/392/3369	Bovis Homes & Westbury Homes
H01 (Hg1)/575/3846	Arlington Property Developments Ltd
H01 (Hg1)/555/2372 - CW	Environment Agency (Planning Liaison)
H01 (Hg1)/575/3847	Arlington Property Developments Ltd
H01 (Hg1)/392/3370	Bovis Homes & Westbury Homes
H01 (Hg1)/718/3992	The Woodland Trust
H01 (Hg1)/98/3052 - CW	Upton St Leonards Parish Council

H01 (Hg1)/111/3065	Councillor M Beard
H01 (Hg1)/111/3066	Councillor M Beard
H01 (Hg1)/392/3371	Bovis Homes & Westbury Homes
H01 (Hg1)/98/3056 - CW	Upton St Leonards Parish Council
Hsg/para. 5.10.3/98/3057	Upton St Leonards Parish Council
H01/98/0306	Upton St Leonards Parish Council
H01 (Hg1)/543/2258	Government Office for the South West

Summary of Objections

- (a) The obligation seeking a local centre within the site may be inappropriate in this part of the overall development site (including the part in Tewkesbury District). The obligations sought should include pedestrian and cycle pedestrian and cycle to adjoining areas.
- (b) There is no reference to pedestrian and cycle connections and bus services in the supporting text to the Brockworth allocation.
- (c) The site is currently in agricultural use, there is no local need for more houses, and there is existing traffic congestion in the local area and road network through Upton St Leonards.
- (d) The proposal may result in an amendment to the City's boundaries. There will be a long travel distance for parish council work which would suggest the area should be combined with Hucclecote Parish.
- (e) The planning obligations for the subsidy of buses to Gloucester and Cheltenham may be too onerous.
- (f) The obligations are unclear relating to open spaces and indoor sports facilities.
- (g) The obligations are unclear relating to scale of facilities, and subsidies.
- (h) The obligations regarding off-site highway works and cycle routes need to be specific.
- (i) The proposal will increase traffic congestion within the Upton St Leonards Parish. A study should be undertaken to determine the effect of additional traffic before additional housing is planned.
- (j) The proposal is too large, and cannot be developed within the plan period without breaching the principle of sequential development within Gloucester city. It should be reduced.
- (k) The site should not be developed until the adjacent site outside of the district is substantially completed.
- (l) The proposal will not assist in the economic and social development of Stroud and will lead to an increase in out-commuting.
- (m) The site is part of a larger development within Tewkesbury Borough, and its planning and phasing should be co-ordinated under one development brief, in consultation with Gloucester City Council. Also, the transport requirements in the proposal should reflect the aims of the Local Transport Plan and may involve phasing the development.
- (n) The proposal, together with Hunts Grove, represents an over-concentration of the housing allocation on two sites. It is considered that the required build rate cannot be achieved in the plan period either with or without the associated phasing policy.

- (o) The proposal should be reduced with the shortfall found through additional allocations under Proposal H2 adjoining the urban area of Stroud to provide a range and choice of housing sites throughout the District in line with the Location Strategy.
- (p) The Gloucestershire Waste Local Plan Pre-Consultation Draft proposes that the land immediately east of the site is to be a Major Waste Management Facility which would have an adverse effect on the amenities of any future residents, and the adjacent SSSI would be almost surrounded by development increasing the risk of damage.
- (q) The site should have a comprehensive masterplan relating to the land in both Stroud and Tewkesbury's areas upon which more specific planning obligations can be identified and accommodated.
- (r) Considers a masterplan would identify that a development brief and a phasing strategy for the development of the site which could be developed to address the site's individual characteristics and should not seek to retain artificial administrative boundaries.
- (s) The level of detail and prescription does not comply with advice contained in PPG12 para 3.14. The plan's policy reference to requirements for land within the administrative area of Tewkesbury Borough Council as believe this approach is 'ultra vires'.
- (t) Whilst accepting that the plan should indicate that planning obligations are likely to be used to secure a mix of uses and social/physical infrastructure, objects to the inclusion of planning obligations within the body of policy H1, Hg1. Believes that such text ought to be set as a note for guidance.
- (u) Also object to the overly prescriptive wording and detailed requirements contained within the policy, in particular to indoor sports facility, community centre, community offices, medical and other practices, a public house, and initial subsidies towards their maintenance.
- (v) It is highly inappropriate for a local plan policy to require subsidies to commercial enterprises. Building design and construction are matters for the Development Control and Building Regulation processes and not a planning obligation.
- (w) Object to the need for a community composting site as waste is an issue for the Waste Local Plan. Accepts that it is proper for the plan's explanatory text to cross-refer to the Waste Local Plan, and that such matters be dealt with in detail in SPG for the site. Clear advice should be provided on how such facilities would operate and be managed.
- (x) The proposal does not accord with policy H4 of the Structure Plan, would not assist in regeneration, environmental sustainability or access to services and facilities. The Council's Site Evaluation Report acknowledges the site is better related to Gloucester than Stroud. Also, concerned about the site's effect on the adjacent AONB and Hucclecote Meadows SSSI.
- (y) Objects to the over prescriptive nature of the proposal as the design and development brief for the Brockworth allocation will be prepared in conjunction with Tewkesbury Borough Council as the site abuts development land within this authority's administrative area.
- (z) Objects to Brockworth allocation on grounds that it should include the following additional planning obligations; 50% car free development and those dwellings constructed first and well located and connected to facilities and services.
- (aa) Objects to the capacity of 500 dwellings on the Brockworth allocation on grounds that, although it meets many of the objectives of the Structure Plan Strategy, the Stroud part of the developable area is likely to be the last part to be brought forward and is undeliverable in the plan period.

- (bb) Objects to the allocation as the site is unrelated to any existing settlements within the District, is questionable if it is truly a brownfield site, does not meet the defined District-wide need for housing land and will satisfy the need arising from Gloucester City and Tewkesbury District. There will continue to be a shortage of housing land in the south of the District and discriminate against people seeking housing in that area.
- (cc) Objects to the planning obligations proposed for the Brockworth allocation as considers these should be negotiated and agreed as part of a development brief and masterplan for the site which has regard to the proposals on the adjoining land within Tewkesbury Borough Council to ensure a sustainable development in social and economic terms.
- (dd) Objects to the size of the Brockworth allocation on grounds that the site is a greenfield site, having been in agricultural use following cessation of its use as an airfield, and should not be developed until brownfield sites are been utilised. Also, considers there are substantial brownfield sites where their capacity is not maximised, the windfall sites have been under estimated, the Local Plan allocates more housing than the guidance set out in the Structure Plan, and the southern part of the allocation, if developed, would intrude into open countryside.
- (ee) It is unclear whether the community office is for Parish Council use. If so, concerned that the offices appear to be site specific to Brockworth and would not allow the Parish Council to locate the office where it thinks appropriate.
- (ff) The allocation will not provide for the social and economic needs of the District and won't sustain the vitality and viability of its settlements, and will encourage the use of the motorway network for local trips.
- (gg) Objects to the affordable housing element of the Brockworth allocation on grounds that the figure is less than 25%, which is the agreed target of the joint working of the Housing and Planning authorities for the wider Gloucester area.
- (hh) Objects to para 5.9.6a on grounds that the Brockworth allocation will bring insignificant benefits to the existing community especially if Lobley's Drive is opened to all types of transport. Considers Abbeymead Avenue is already congested at peak times and traffic lights will create a gridlock situation whereby people will not be able to exit from Upton Lane onto Abbeymead Avenue. Considers the main access should be through the Arlington site and secondary through Cranham Gate.
- (ii) Objects to para 5.9.6a as considers the Council has insufficient control to ensure that the 'whole area is developed in a co-ordinated manner' or that development in TBC will take place at a sufficient rate to create the 'largely self-contained new community' that the plan aims to achieve. Considers that the phasing attached to this site means that the proposed allocation may not be deliverable within the plan period, and may prejudice the ability of TBC to achieve its own plan objectives.
- (jj) Objects to para 5.9.6e in relation to the minimum target of 25% affordable housing stock and the prescribed 93 units for rent, without reference in the plan to a local housing needs survey. Also question the status of the Housing Partnership. Considers PPG3 is clear in its advice that decision about the amount and type of affordable housing should reflect local housing need and be a matter for agreement between the LPA and developers and should be reasonably flexible in deciding the type of affordable housing and that such decisions are based on a 'rigorous assessment of need.' Also that the plan fails to meet the requirement that decisions involving affordable housing contributions are transparent and accountable as stressed in PPG3 para 20.

- (kk) Objects to para 5.9.6f as Arlington question the role of Stroud in determining the hierarchical road access to the Stroud residential site at Brockworth when the access points lie outside the plan area.
- (ll) Objects to the Brockworth allocation on grounds that the need for a buffer zone along the small watercourse, should be stressed, and the layout should reflect the pattern of ditches and field boundaries.
- (mm) The level of detail within it relating to the interface between the site and the Arlington development should be addressed at the time of a planning application coming forward.
- (nn) Objects to para 5.9.6j (recreation) in relation to the Brockworth allocation as considers the plan makes no justification for the provision of an indoor sports facility. Also, considers Upton St Leonards PC and the Woodland Trust have raised considerable objections to access between the development and Trust land at Nut Hill and may be undeliverable.
- (oo) Considers a continuation of livestock grazing is the most sustainable management regime for the site, but this becomes a less viable option where public access to a site increases. The Trust is concerned that the present conservation value of the site, and its enjoyment by the local community is not adversely affected by the proposed development. Should not be assumed that the Trust would automatically agree to any linkage or direct connection being made for public access.
- (pp) Objects to the para 5.9.6j in relation to reference to Nut Hill and public access. Considers Nut Hill is a sensitive landscape and cannot sustain intensive recreational use.
- (qq) Objects to para 5.9.6k on ground that the site should provide one primary and one junior school rather than two primary schools.
- (rr) Objects to para 5.9.6k on grounds that arts and crafts studios should be linked to create social partnerships rather than be divided and isolated.
- (ss) Objects to para 5.9.6k in relation to the Brockworth allocation as considers it is too prescriptive and can see no reason why arts and crafts activities should be singled out from, say small home office uses.
- (tt) Considers the approach in the plan to produce a development brief may seem logical, but it overlooks the difficulties inherent in planning sites that straddle District borders.
- (uu) Brockworth site is greenfield and should be described as such and developed after brownfield options.
- (vv) Objects to the planning obligations set out in Proposal H1 in association with the Brockworth allocation on grounds that the environmental measures required to protect existing communities are not taken account of.
- (ww) Objects to the Brockworth allocation on grounds that the site is located close to the motorway and is likely to encourage travel by car. What account has been taken of the need to reduce travel by car in selecting the site and also should explain what account has been taken of the ability of the motorway to accommodate the traffic/trips likely to be generated, the cumulative impact of other nearby development including proposals in adjoining districts that is likely to have an impact on the motorway.
- (xx) Considers the proposal represents a significant eastward expansion of the Gloucester Urban area and, whilst the phasing policy takes account of development in Tewkesbury, no account appears to have been taken of the possible effects of the proposals on the Gloucester urban area. The plan should show that its provisions for housing development at

Brockworth will not undermine efforts to promote the re-use and regeneration of previously developed land in Gloucester.

Proposed Changes

H03A/PIC093/392/5154/CO	Bovis Homes (SW) Ltd & Westbury Homes Holdings
H03A/PIC093/299/5221/CO	Gloucester City Council
H03A/PIC093/299/5320/CO	Gloucester City Council

Summary of Objections

- (a) The allocation is unsustainable and will impede the regeneration of Gloucester and will not benefit Stroud District.
- (b) The site has been wrongly categorised as part brownfield and part greenfield.
- (c) There should be more co-ordination between Tewkesbury and Stroud Councils in their approach to the development of the site.
- (d) The minimum target of 25% affordable housing is not based on a robust housing needs survey.
- (e) The development will be incongruous in the landscape and will detrimentally affect designated areas and Upton St Leonards.

Inspector's Reasoning and Conclusions

- 5.1.1 The former airfield site at Brockworth straddles the District boundaries of Tewkesbury and Stroud. Both Councils have allocated their parts of the site for a major residential development. The intention of both Councils is to work together so that the whole site is developed in a consistent and sustainable manner. To this end they have jointly prepared the Brockworth Airfield Development Brief Core Document CD/L24a)
 - 5.1.2 The Inspector appointed to report on the Tewkesbury Borough Local Plan is Ms Mary Travers and we have each been appointed Assistant to one another in coming to our respective recommendations. In this way our intention is to present a consistent and co-ordinated approach towards the development of the site.
 - 5.1.3 Ms Traver's report on the Tewkesbury portion of the site has been submitted to the Borough Council, and I will refer to it where necessary in my consideration of the issues raised in relation to the Stroud portion of the site.
 - 5.1.4 I have identified a number of 'themes' to the objections, through which I find it convenient to deal with the matters various objectors have raised, since many of the matters overlap. I now deal with these themes.
- (a) *The allocation is unsustainable and will impede the regeneration of Gloucester and will not benefit Stroud District.***
- 5.1.5 Concern is expressed by a number of objectors that the concentration of housing development in the northern most extremity of the District is in effect starving the remainder of the District of much needed residential development. They claim this

would have negative consequences for the vitality of the District's communities in terms of economic and social regeneration. Some objectors consider that the development of Hg1 represents the extension of Gloucester City into the Stroud District and concerns are also raised about the implications of the allocation for the regeneration of brownfield sites in Gloucester.

- 5.1.6 Policy H4 of the Structure Plan requires that most residential development in Gloucestershire should take place within the Central Severn Vale (CSV). Site Hg1 abuts the City of Gloucester and as such is within the CSV. Policy H4 states that priority should be given to development in Gloucester and Cheltenham and then to locations adjacent or close by. Policy H5 of the Structure Plan specifically refers to land south of Brockworth and requires local plans to make provision for mixed and sustainable urban extensions to the urban area of Gloucester. I note that the Deposit Draft (Third Alteration) of the Structure Plan reaffirms the previous strategy of concentrating development around the Principal Urban Areas of Gloucester and Cheltenham, in Policy SD1, and this is in conformity with Regional Planning Guidance.
- 5.1.7 From a strategic perspective, site Hg1 is a more sustainable location than the towns and villages in the District. Its allocation represents the reality that while Stroud and the smaller settlements are important local centres for services and some employment, the main concentration of higher order services and employment in the County are in the Principal Urban Areas of Gloucester and Cheltenham. In reality the district and parish boundaries are artificial and must not be used as barriers to promoting more sustainable patterns of development. No evidence has been submitted to suggest that towns and villages in the District are unviable or under threat. The environment of Stroud District and the quality of life will be better served by concentrating the majority of residential development closest to services that people use and the places where people work.
- 5.1.8 In response to the point raised by Government Office for the South West regarding the proximity of the site to the M5, while some residents may take advantage of the motorway to commute to work from the site, 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. Policy Hg1 clearly sets down a series of provisions that will have to be made including an initial subsidy of bus services to Cheltenham and Gloucester and the provision of pedestrian and cycle routes within the site. The location of site Hg1, within walking distance of the Gloucester Business Park also offers an unrivalled opportunity to reduce the need to travel, which is one of the Government's main transport objectives as set down in paragraph 4 of PPG13. 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. As no objection has been received from the Highways Agency, I am reinforced in my view that conformity with strategic policy should not have a detrimental effect on the M5 motorway, either with regard to this site or in combination with any other designation.
- 5.1.9 The regeneration of Gloucester City Centre is unlikely to be prejudiced by the Brockworth allocation. The focus for City Centre renewal in Gloucester will be on high density development such as apartments, and as such these developments will not be in direct competition with the much lower density development envisaged on site Hg1. As Ms Travers stated in paragraph 2.11.31 of her report, the Structure Plan housing requirement for each of the districts takes account of their respective needs and potential to fulfil those needs within their own boundaries. It would be unjustified to seek to phase site Hg1 to the latter part of the plan period to allow for the completion of sites in

Gloucester City with which it will not be in competition.

(b) The site has been wrongly categorised as part brownfield and part greenfield.

- 5.1.10 For the purposes of Proposal Hg1 I will only consider the planning history and physical characteristics of the site in coming to my decision about its characterisation as either brownfield or greenfield. Phasing issues related to this matter are dealt with elsewhere in this report.
- 5.1.11 An objection is raised concerning the designation of the site in PIC093 (Table 5.5) as a greenfield/brownfield site. The Council has changed its view on this question: I accept its 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. Although all of the site was in a single ownership, whilst there is evidence that some clearance took place, including the felling of trees, in my view the evidence clearly points to it never having been operational land. The fact that the whole of the site was 'whited out' by the Ordnance Survey in 1955 is potentially a telling argument, but taken with all other evidence it does not persuade me: since all detail of the airfield was being omitted from maps for cold-war security reasons, it seems to me to be likely that the Survey would err on the side of caution as to what was shown. The ditch, fence and hedgerow separates the greenfield part from the brownfield portion of the site. This view is supported by advice in PPG3 Annex C which defines the curtilage of land as being the land attached to a building, in this case the runways, taxiways and operational areas and buildings that made up the airfield. The boundary features just mentioned are evidence that the southeastern part of the site was outside of the curtilage of the airfield.
- 5.1.12 With regard to other related objections which cast doubt on any part of site Hg1 being categorised as brownfield land, I have seen no compelling evidence from any objector to suggest that any part of the site to the north and west of the ditch and hedgerow was not used previously in conjunction with the airfield. The brownfield portion of the site has not blended back into the landscape and evidence remains of its previous use as an airfield. From the largely anecdotal evidence presented I consider that any agricultural management and use of the brownfield portion of the site was ancillary to its previous use as an airfield and has no bearing on its characterisation as brownfield land.
- 5.1.13 Since this is a 'strategic site' following from Structure Plan policy, 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. The Council is clearly aware of the sensitive nature of this part of the site, as shown on the Plan 'Development Concept' in the Development Brief, reserving much of it for landscape and open space uses, and the remainder for lower density development.

(c) The obligations are too detailed and there should be more co-ordination between Tewkesbury and Stroud Councils in their approach to the development of the site.

- 5.1.14 Most of the objections regarding this issue relate to the "obligations" set down under Proposal Hg1. I agree with proposed change PRO056 insofar that reference to "obligations" is changed to "provisions". This change is necessary because the Council can only seek to negotiate planning obligations and can not require them of the developers as was suggested in the wording of the Revised Deposit Plan.
- 5.1.15 The stated intention of both Tewkesbury and Stroud Councils is to adopt the Development Brief for the Brockworth site as SPG. Indeed, Stroud District Council adopted the Development Brief in April 2002, and my understanding is that Tewkesbury

Borough Council intends to do so on receipt of Ms Travers report. 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. Paragraph 1.3 of the Development Brief states that it will be used by both Councils when processing planning applications for the site. Since the draft brief was subject to consultation procedures, it can be expected to carry weight as a material consideration when negotiating at development control stage.

- 5.1.16 Some objectors have stated that there is no need for the Proposal to list detailed planning obligations in the Plan and that this level of detail should be left to a development brief and masterplan, or negotiated through the planning application process. The Council has responded to these objections by proposing the deletion of some of the more detailed and procedural matters from the Proposal such as reference to phasing and contributions towards the biodiversity plan.
- 5.1.17 While I agree with the view that detailed and procedural matters should be left out of the Plan, I am mindful of advice in PPG12, paragraph 3.12 that site specific proposals should provide a positive lead for development and help to create certainty. Proposal Hg1 should set down a framework into which detailed planning obligations will fit. It should provide a basis for negotiation and should not constitute a detailed list of desirable benefits. With this in mind, 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. I do not consider it appropriate to include detailed matters such as the provision of allotments and a community composting site at the allocation stage. These are detailed matters that are already contained in the Development Brief. The overwhelming emphasis of the Proposal should be on the comprehensive development of the Brockworth site and not detailed planning obligations that apply only to the Stroud part of the site. These can be negotiated at a later stage.
- 5.1.18 Reference to “the incorporation of the principles of best practice guidance in sustainable building design” is a matter which falls to be dealt with at the planning application stage, and should not be included in the body of the policy. It is more appropriately considered as informative text in the reasoned justification. In a similar vein and in response to objections that seek more stringent and detailed obligations, it would not be appropriate to pre-empt negotiations with developers with regard to the delivery mechanism of subsidies and the extent of responsibilities about such issues as maintenance of open space and sports facilities, at this stage of the development process.
- 5.1.19 The remaining provisions for the whole Brockworth site, incorporating the proposed changes in PRO056 are improved, however I consider that they are still too detailed. The deletion of the reference to the public house and the clarification of the provisions for education in accordance with the County Council’s recommendations are a big improvement, however the remaining detailed obligations should be significantly modified to simplify the proposal and to ensure flexibility in the planning of this cross boundary development.
- 5.1.20 I support the deletion at the Revised Deposit stage of the reference to arts and craft centres and consider these to fall under the general term “community facilities”, the extent and nature of which will be the subject of negotiation between the Council and the developer. With this in mind, reference to “community centre”, “community offices”, “medical and other practices” and “indoor sports facility” should also be deleted from

the main body of Proposal Hg1 in favour of the generic term, “community facilities”. That being done, it then seems to me that it is unnecessary to have the clause “within the overall development site including land within both Tewkesbury Borough and Stroud District”. All of the development features now included will be needed to some extent within the Plan area, and the Development Brief and the joint approach between the Councils will suffice for co-ordination and to secure a comprehensive development. As to the mention of ‘affordable housing’, it is government policy that this should be sought, and any site of this size would be subject to a requirement to seek agreement as to such provision. I therefore consider it unnecessary for it to be included as part of the description of the development included in the proposal.

- 5.1.21 The reasoned justification in paragraphs 5.9.6j and 5.9.6k should also be substantially modified to make them far less prescriptive about the nature and extent of local services and community facilities that will be sought. I acknowledge the Parish Council’s concerns that facilities should be made available for them, however this level of detail is inappropriate as a matter for inclusion in this local plan and in the absence of any compelling evidence that such facilities will actually be needed.
- 5.1.22 Many objections related to the location of the local centre and community facilities and specifically to the inference in the Deposit Plan that the local centre would be located in Stroud District. The changes made by the Council in the Revised Deposit Plan and the proposed changes in PRO056 have gone a long way to clarify that no definitive location has been determined for the local centre and that the site will be planned comprehensively between the two authorities. This approach is taken in paragraph 2.11.32 of Ms. Travers report where she states that there should be no inference that some of facilities should be located in one administrative area or the other.
- 5.1.23 The best location for the local centre is obviously in the most accessible and convenient location for the residents and neither the Proposal nor the Development Brief has prejudiced this in any way. There is certainly no suggestion that local shopping and community facilities would be located off site on land within the Gloucester Business Park, although the Proposal does not preclude this either. However, as the Council has suggested it would be difficult to envisage that a local centre and community facilities would be very accessible to the residents if it were located in the Gloucester Business Park, given the accessibility data displayed on page 29 of the Development Brief.
- 5.1.24 With regard to the objections relating to the lack of reference to pedestrian and cycle and public transport connections, the Council has included these matters in the Revised Deposit Plan Proposal and the reasoned justification in paragraph 5.9.6g. I support the additions to the Proposal and the reasoned justification and consider they satisfy the related objections.
- 5.1.25 One objector casts doubt on the fairness of seeking subsidies for bus services from developers in the initial phases of the development. In particular doubt is cast on the fairness of seeking subsidies on bus services to Cheltenham, as well as Gloucester. As the Council has stated, good public transport links to the main centres of Gloucester and Cheltenham are required to encourage alternative transport modes to the car. PPG13, paragraph 85 clearly states that planning obligations in relation to transport should be based around securing improved accessibility to sites by all modes, with the greatest degree of access by public transport. The development is unlikely to be able to support bus services in the early phases and as such it is entirely appropriate for the Council to seek such subsidies for services to both of the County’s major service and employment centres.

- 5.1.26 In response to the objections that more detail is required in relation to the obligations, it would not be practical to stipulate in detail the off site highway works and cycle routes at this stage of the development process. These are more detailed matters that will be considered at application stage.
- 5.1.27 I support the proposed deletion of the reference to access to Nut Hill from site Hg1 from paragraph 5.9.6j, in PRO065, which was made in response to advice from the landowner.

(d) The minimum target of 25% affordable housing is not based on a robust housing needs survey.

- 5.1.28 The Council has states that the figure of 25% is not predetermined but is sought based on identified need. The Council has based its 25% figure on the evidence in the 1999 Housing Needs Survey (HNS) that 22% of the shortfall in affordable housing is made up of those seeking shared ownership and rented accommodation. The Council has then rounded up the shortfall to 25% on the basis that not all allocations in the Local Plan may provide affordable housing opportunities. I prefer the evidence put forward by the Council on the affordable housing need to that put forward on behalf of the Objectors.
- 5.1.29 I consider that it is right that the text should make clear the amount of affordable housing on site that the Council will seek. As is made clear by the change from ‘obligations will be sought’ to ‘provision will be sought’, it will be a matter to be negotiated at application stage. Given the evidence presented in the HNS, I support the 25% figure as an appropriate starting point for negotiations. I accept the Council’s explanation that the 25% figure is based upon the HNS data, rather than an attempt to emulate the Tewkesbury affordable housing target, or follow the decision of the Multi-District Joint Commissioning Partnership. However, the text should make this clear.

(e) The Development will be incongruous in the landscape and will detrimentally affect designated areas and Upton St Leonards.

- 5.1.30 Many of the objections relate to the concerns of residents of Upton St Leonards about the affect of the development on the residential amenity of the village. In particular the Parish Council raises concerns about traffic congestion in the village as a result of the development.
- 5.1.31 Proposal Hg1 and paragraph 5.9.6g make provision for good public transport links to the site and require that the development is highly accessible for cyclists and pedestrians. The Proposal also requires that a transport assessment is produced in conjunction with any planning application for the site. 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. With regard to the concerns about the affect of motorway noise, it is clear that this is a consideration which has not been overlooked. The Councils’ Environmental Health Officers are involved, and I have no doubt that, if need be, they can seek advice from experts in this particular field. There is experience of remedial measures available, since the Highways Agency has recently been erecting a noise barrier at Upton St Leonards.
- 5.1.32 In respect of the detailed points regarding Lobley’s Drive and the wider area, I understand that 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.

- 5.1.33 Orchard Trust objected to the affect of the development on the Cotswolds AONB and the Hucclecote Meadows SSSI. The AONB abuts the site to the south of the site and the SSSI lies to the West.
- 5.1.34 With regard to the AONB, I reiterate Ms Travers' considerations in paragraphs 2.11.18 and 2.11.19 of her report. In particular I would emphasise that the housing areas in the Stroud part of the site respond to the sensitive nature of the footslope in the south eastern corner in terms of their density and the location of open areas. In particular the proposed location of the school site would continue the open space buffer, separating the housing areas from the AONB. The elevated views from the AONB towards the site are generally from some distance, as noted by Ms Travers, and are set with the context of the Gloucester urban area, including the large buildings of the Gloucester Business Park. The development of the Brockworth airfield site provides the potential to create a more sensitive relationship between the AONB and the edge of the urban area through good, detailed design. In this way, while views into and out of the AONB would be altered by the development, their visual impact would not be harmful and there would be no need for more extensive buffer zones. Paragraph 5.3 of the Development Brief requires developers to provide an analysis of site topography identifying sensitive boundaries and the AONB backdrop. 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.
- 5.1.35 The argument on behalf of the Parish Council about the extent of the footslope and the designation of the Area of High Landscape Value in this vicinity inevitably rests on a judgement which has to be taken in the context of the District as a whole. 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.
- 5.1.36 Turning to the SSSI, English Nature has been consulted about the affects of the development on the site and a package of mitigation measures have been developed and refined. Paragraph 5.2 of the Development Brief explains that a new path will be required to divert foot traffic away from the most sensitive parts of the SSSI. A buffer zone, fencing and signage will also be required to further protect the SSSI from the potential intensification of its use by the future residents of the site. 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.
- 5.1.37 The National Trust objected to the Proposal on the grounds that the Gloucestershire Waste Local Plan Pre-Consultation Draft is proposing that the land immediately east of the site is to be a Major Waste Management Facility, which would surround the SSSI with development and detrimentally affect the amenities of future residents more generally. The Council has explained that they have objected to this waste proposal at the Waste Local Plan Inquiry, held in November 2001. I accept that the conclusions of the Inspector's report will determine the Council's approach towards this issue.
- 5.1.38 There are references in the reasoned justification to the development brief in the future tense. Since the brief has been approved by the Council, and presumably will have been approved by Tewkesbury Borough, the text should be reviewed to refer to an approved

SPG document. This in turn will provide the stronger link between the Plan's policies and the brief. This is also likely to enable the text to be made more concise.

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.