

# Gloucester City Council

<b>Meeting:</b>	<b>Council</b>	<b>Date:</b>	<b>28<sup>th</sup> November 2013</b>
<b>Subject:</b>	<b>Stroud District Council Local Plan Pre-Submission Draft</b>		
<b>Report Of:</b>	<b>Cabinet Member for Regeneration and Culture</b>		
<b>Wards Affected:</b>	<b>All</b>		
<b>Key Decision:</b>	<b>Yes</b>	<b>Budget/Policy Framework:</b>	<b>Yes</b>
<b>Contact Officer:</b>	<b>Mick Thorpe: Development Services Manager</b>		
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<b>Appendices:</b>	<b>1. Minutes of Report to Council on 22<sup>nd</sup> March 2012</b>		

## 1.0 Purpose of Report

- 1.1 To agree the City Council's response to the Pre-Submission consultation of the Stroud Local Plan

## 2.0 Recommendations

- 2.1 Council is asked to **RESOLVE** to approve the recommendations amended and agreed by Planning Policy Sub Committee on 29 October 2013, namely that the authority responds to the Pre-Submission Draft of the Stroud Local Plan as follows:

- (i) *Gloucester City Council welcomes the opportunity to comment on Stroud's Pre-Submission Draft Local Plan (September 2013)*
- (ii) *That the decision to lengthen the plan period from 2026 to 2031 be welcomed as it harmonises with the Gloucester Tewkesbury and Cheltenham Joint Core Strategy and the Gloucester City Plan development periods and that the Council be supported in the principle of its proposal to meet its housing target of 9,500 dwellings by 2031.*
- (iii) *That the City Council objects to the continued expansion of the urban area of Gloucester through the proposed allocation of a further 500 new dwellings at Hunts Grove. This approach conflicts with the Draft Joint Core Strategy for Gloucester, Tewkesbury and Cheltenham and the strategy of the City Plan which seeks to focus growth around the north, west and east of the Gloucester urban area,*

- iv) *That the City Council does not support proposals to promote an urban extension to Gloucester City at Hunts Grove as the most sustainable choice for addressing Stroud's housing needs*
- (iv) *The City Council supports Stroud Pre-Submission Draft Plan position that alternative locations to the south of Gloucester, namely Whaddon and Hardwicke, are unsuitable locations for development.*
- (vi) *That Stroud and Gloucester City Councils continue to work together on cross boundary issues as part of the Statutory Duty to Cooperate, particularly in respect of continuing to align the evidence base supporting the development plans of each authority*
- (vii) *That Stroud District Council be requested to amend the review policy set out in policy C2, to ensure the plan is seen as being positively prepared and in line with national guidance, as follows:  
"Stroud District Council will give due consideration to the need to assist neighbouring authorities in meeting their unmet objectively assessed development through an early review of its plan if required based on ongoing monitoring and co-operating with the other authorities to ensure any future shortfalls that may arise in the delivery of housing and employment growth across the area are assessed and provided for in the most appropriate and sustainable way".*

*In addition, the following associated changes to the supporting text be requested :*

*"Cheltenham Borough, Gloucester City and Tewkesbury Borough Councils are currently preparing a Joint Core Strategy. If neighbouring authorities can demonstrate through their local plan process that there are unmet development and infrastructure requirements that could be met more sustainably through provision in Stroud District, these will be considered by Stroud District Council and may be incorporated into an early review of this Local Plan"*

### **3.0 Background and Key Issues**

- 3.1 Stroud District Council published its Pre-Submission Draft Local Plan for consultation on 4<sup>th</sup> September 2013 for a 6 week period of public consultation and has invited Gloucester City as a neighbouring authority to respond to its content. The publication of the Pre-Submission Draft Local Plan follows previous consultations including a Preferred Option consultation in February 2012. Council considered a response to the Preferred Options consultation on 22<sup>nd</sup> March 2012, and the agreed minutes which formed the basis of the response to Stroud District Council are attached at Appendix 1.
- 3.2 The Stroud Pre-Submission Draft Local Plan is accompanied by a Sustainability Appraisal, a Viability Report, and a Community Infrastructure Levy (CIL) Development Appraisal Study and an extensive evidence base on planning policy related issues including housing, employment, landscape and flooding. All of these documents are available to view on the Stroud District

Council website at the following link;

[http://www.stroud.gov.uk/docs/planning/planning\\_strategy.asp#s=sectioncontent2&p=submission,BASE](http://www.stroud.gov.uk/docs/planning/planning_strategy.asp#s=sectioncontent2&p=submission,BASE)

- 3.3 At the 'Pre-Submission' stage any representations made by Gloucester City Council can only relate to the 'soundness' of this version of the Stroud Local Plan. The tests of soundness are set out in the National Planning Policy Framework (NPPF) para 182 and are as follows;
- A plan must be **positively prepared** – based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities from where it is reasonable to do so and consistent with achieving sustainable development;
  - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
  - **Effective** - the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities; and
  - **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework
- 3.4 The City Council must therefore consider in its response how the Stroud Pre-Submission Draft Local Plan performs against the tests of soundness outlined above.
- 3.5 The strategy being pursued by Stroud District is one of prioritising opportunities for economic growth with an aspiration that development up to 2031 will generate the equivalent of two new jobs for every new allocated home built. Stroud District makes provision for 9,500 new homes through the plan period up to 2031. The spatial strategy is based on concentrated development, focussed on a small number of strategic growth areas, within or adjacent to larger settlements with the best access to services, facilities, jobs and infrastructure, rather than dispersed development within small settlements.
- 3.6 The plan identifies four strategic growth locations at North East Cam; the Stroud Valleys; south of Gloucester and at Sharpness .
- 3.7 The 'Gloucester Fringe' sub area is identified as a strategic growth area with the largest of all the proposed strategic housing allocations in the pre-submission plan being located at Hunts Grove.
- 3.8 In the Stroud Preferred Option consultation of spring 2012, 500-750 new dwellings were proposed at Hunt's Grove. This is reduced to an allocation of 500 additional dwellings at Hunts Grove in the new plan, resulting in 2,250

dwellings being built at Hunts Grove in total. The site is allocated for housing and supporting infrastructure including local retail and community uses as well as a primary school of sufficient scale to meet the needs of the development.

- 3.9 In addition the Pre-Submission Plan also includes an additional employment allocation of 13ha to the south of the City east of the M5 motorway at Quedgeley East Business Park. The site is allocated for B1 and B8 employment uses at Policy SA4a (p.67). Access to the site will be from the existing B4008. The development will provide contributions to off site highway works including public transport, pedestrian and cycle links to Gloucester City, Stonehouse and Stroud.
- 3.10 Javelin Park is also identified as a key employment site. The site allocated in the Stroud Pre-submission Plan includes the site allocated in the County Council County Waste Core Strategy, adopted in November 2012 and the subject of a refused planning application to the County Council for a waste incinerator, plus a further parcel to the north to abut the car park of the garden centre/retail complex at Junction 12 of the M5 motorway. The proposal is currently subject to a planning appeal.
- 3.11 In essence, development on the Gloucester fringe will include not only housing and related uses at Hunts Grove but also additional employment development to the east of Junction 12 of the M5. It is also possible that other settlements within the Gloucester fringe (eg: Hardwicke, Upton St. Leonards) may wish to allocate new development through Neighbourhood Plans commensurate with policies contained in Chapter 4 (p.87).

#### 4.0 Summary of proposed changes and their implications

- 4.1 The key differences between the current pre-submission plan and the former preferred option plan with regard to the Gloucester Fringe are tabulated for members below:

Feb 2012 Preferred Option Plan	Sept 2013 Pre-Submission Plan	Difference
Up to 750 dwellings proposed at Hunts Grove	500 dwellings allocated at Hunts Grove	Reduction of 250 dwellings at Hunts Grove
New local service centre including retail and community facilities for whole Hunts grove area	New local service centre including retail and community facilities for whole Hunts grove area	None
Suggestion that the area could be a focus for employment growth and intensification at key employment sites near to Hunts Grove but no proposed allocations or quantum of development identified.	13ha of employment allocated as strategic site allocation at Quedgeley East Business Park 11.23ha at Javelin Park allocated as a key employment site	A total of 24.23ha of land allocated for employment across two sites at Junction 9 of M5
Safeguarded land at Hunts Grove for potential new rail station	Safeguarded land at Hunts Grove for potential new rail station	None

- 4.2 In its representations the draft plan the Council objected to the Hunts Grove allocation and the identification of major development locations, without supporting evidence and detail on infrastructure provision.
- 4.3 While the reduction in additional overall housing numbers is to be welcomed at Hunts Grove, the point still remains that increasing the number of households living to the south of Gloucester will continue to put pressure on the existing services and facilities available in the south of the City, notwithstanding the new local centre to be delivered in the re-master planning of Hunts Grove. The precise detail of the new services and facilities to be provided in a re-masterplanned Hunts Grove is at yet unknown.
- 4.4 Feedback from the Gloucester City Plan public consultation this summer continued to highlight the difficulties that those moving into the urban extension of Kingsway within the City experience in terms of accessing local services and facilities. Additional development at Hunts Grove is likely to place further stress on existing services and facilities in Quedgeley at the district centre and Kingsway local centre until the proposed Hunts Grove local centre is delivered.
- 4.5 Members will also be aware that there are still a further 800 dwellings to be built out at Kingsway, whose future residents will also require access to services and facilities in this part of the City. An additional 500 homes at Hunts Grove will bring a total of 1950 more homes on this site. A further 200 homes at Sellars Farm in Hardwicke, 800 outstanding dwellings at Kingsway as well as City Plan allocations and commitments at Quedgeley, amounting to a further 240 dwellings are also in the pipeline. In summary, a further 3,190 dwellings could be delivered to the south of the City all placing demands on existing services and facilities including secondary schools, medical, retail and leisure facilities.
- 4.6 The Stroud Pre-submission Local Plan does not provide further detail on how the services and facilities to meet the needs of the new proposed population living within their area will be met. While locating development to the south of the City may be seen by Stroud District as being sustainable in terms of its strategy for Stroud District, it is not appropriate that the City should meet the service and facility needs of new housing located in Stroud District when the development is being provided solely to meet Stroud's housing needs and not those of the City.
- 4.7 In addition Members are reminded that the rationale behind the Council's strategy for developing to the north is to ensure the City's population is housed in locations that can support the city centre and continued regeneration, as well as being close and accessible to a range of employment locations to reduce CO2 omissions and utilise and get best value from new infrastructure provision.
- 4.8 Members should note that the allocation of 24.23ha of employment land identified in the pre-submission draft at Junction 12 of the M5, is in line with the LEP strategy of clustering more employment land adjacent to the M5. In support of the emerging growth plan, it is not recommended that this be opposed. However, this will be in direct competition with the large existing

employment commitment at Kingsway of 15ha and the proposed City Plan employment allocation to provide an extension to Waterwells Business Park, and could also support arguments that it should be balanced with further housing allocations to the south of the City.

## **5.0 Infrastructure Provision and Sustainability Appraisal**

- 5.1 Stroud District has procured an Infrastructure Delivery Plan to accompany the pre-submission version of the Local Plan. Given the arguments above about infrastructure requirements to meet the needs of not only new proposed growth in Stroud District but also possible new development coming forward to the south of the City through the City Plan, it is considered that a broader approach to infrastructure provision needs to be taken. This could be achieved through closer collaboration between the two Councils, as part of fulfilling our responsibilities under the duty to cooperate.
- 5.2 Earlier versions of the Stroud Plan identified a number of options for development on the southern periphery of Gloucester, all of which were subject to sustainability appraisal. A similar assessment of the same locations has been undertaken by the JCS authorities as part of the Draft Joint Core Strategy; this concluded that locations south of Gloucester were discounted as having the potential to meet the needs of the JCS area. Other locations were identified as being preferable and these have gone forward into the Draft JCS which is about to be the subject of public consultation. The Council should therefore support the findings of the Stroud assessment in respect of Whaddon and Hardwicke.

## **6.0 Request for Joint Core Strategy Joint Response**

- 6.1 Since the agreement of the three Councils to publish the Draft Joint Core Strategy in September, our partners Tewkesbury and Cheltenham Borough Councils have asked that Gloucester make a joint response with them to the effect that the proposed allocation at Hunts Grove, if endorsed by the Planning Inspector for the Stroud Plan examination, be counted as contributing mainly to meet Gloucester's housing need not Stroud's.
- 6.2 The Tewkesbury Borough Council/Cheltenham Borough Council suggestion would be consistent with the approach being taken to urban extensions at north Gloucester in Tewkesbury's administrative area and on the face of it could be considered logical. Members will see that in Appendix 1, Resolution (v) of the response to the earlier consultation in March 2012, the City Council has already commented that the evidence shows that development here will not in reality be serving Stroud. However, there is no agreed wider strategy for the Gloucestershire Housing Market Area that commits Stroud to this, and Stroud consider Hunts Grove serves its needs and is a justifiable strategy for its area. This is substantially the same position that Stroud took when originally allocating Hunts Grove against the policies of the Structure Plan, and Members will recall that it received the backing of the Local Plan Inquiry Inspector.

- 6.3 While Members may follow the logic of JCS partners' approach, given that the Inspector previously was persuaded that Hunts Grove met Stroud's need, there is a strong likelihood that any reduction of the Hunts Grove allocation to Stroud will result in proposals to allocate further land to the South of Gloucester. This could take the form of increased numbers at Hunts Grove or proposed allocations at Whaddon and Hardwicke. It should be borne in mind that Joint Core Strategy partners do not share fully the City Council's long held policy opposition to further growth to the south of the city.
- 6.4 Members will be aware that within the Draft JCS there is currently a mismatch between the identified need for Gloucester and the current allocations, amounting to around 1,000 dwellings (or around 700 dwellings if allocations extending beyond 2031 are included). A further resolution to resolve this before the JCS reaches the next stage was agreed by all three Councils. It is strongly suspected that claiming some contribution from Stroud to help resolve this is our partners' intention. Your officers' view is that this relatively modest shortfall can be resolved wholly within the JCS area by looking again at site capacities and reconsidering the allocation of existing commitments.
- 6.5 Policy C2 of the Pre Submission Plan makes reference to a review of the plan and "giving due consideration to housing proposals that are intended to meet the clearly identified needs of a neighbouring local authority and that are set out in an adopted Local Plan"
- 6.6 This policy, while welcome, does not, in our view, precisely align with the NPPF and recently published advice which advises that "Cooperation should take place throughout Local Plan preparation – it is important not to confine cooperation to one point in the process ... Cooperation should continue until plans are submitted for examination and beyond into delivery and review."
- 6.7 It is therefore suggested at the Policy CP2 should be strengthened to read :  
*"Policy CP2 : "Stroud District Council will give due consideration to the need to assist neighbouring authorities in meeting their unmet objectively assessed development through an early review of its plan if required based on ongoing monitoring and co-operating with the other authorities to ensure any future shortfalls that may arise in the delivery of housing and employment growth across the area are assessed and provided for in the most appropriate and sustainable way".*
- 6.8 An associated change would be required to the supporting text as follows:  
"Cheltenham Borough, Gloucester City and Tewkesbury Borough Councils are currently preparing a Joint Core Strategy. If neighbouring authorities can demonstrate through their local plan process that there are unmet development and infrastructure requirements that could be met more sustainably through provision in Stroud District, these will be considered by Stroud District Council and may be incorporated into an early review of this Local Plan"
- 6.9 Given the position explained in 6.4 above, officers consider that there is considerable merit in pressing our JCS partners over the coming months on resolving matters within the JCS, and continuing to cooperate with Stroud by

supporting their suggestion for strengthening their early review policy. This would not prevent the City Council maintaining its objection to Hunts Grove.

## **7.0 Alternative Options Considered**

7.1 The Council could choose not to respond to the Stroud Local Plan consultation; however this would not be in the council's interest as it has already made an objection and Stroud District Council needs to be clear about this Council's views. As part of the duty to co-operate, it is also important for the authority to demonstrate that it has engaged effectively with neighbouring authorities such as Stroud.

## **8.0 Reasons for Recommendations**

8.1 An informal officer response to the Stroud Local Plan consultation has already been submitted to meet the deadline for consultation responses; this report and accompanying recommendations are required to formalise the Council's response to the Stroud Local Plan.

## **9.0 Future Work and Conclusions**

9.1 If approved, this authority's representations will go forward to be considered by Stroud District Council along with other representations. The intention is that a final submission version of the Stroud Local Plan will be submitted to the Secretary of State in December 2013. Following this, it is anticipated that a public examination will be held next year.

## **10.0 Financial Implications**

10.1 There are no direct financial implications associated with this report (Financial Services have been consulted in the preparation this report.)

## **11.0 Legal Implications**

11.1 The comments and objections set out in this report will be taken forward as part of a number of representations which will be considered as part of the Public examination of the Stroud Core Strategy , expected in 2014 (Legal Services have been consulted in the preparation this report.)

## **12.0 Risk & Opportunity Management Implications**

12.1 There are no high risks associated with this report



### **13.0 People Impact Assessment (PIA):**

- 13.1 The PIA Screening Stage was completed and did not identify any potential or actual negative impact, therefore a full PIA was not required.

### **14.0 Other Corporate Implications**

#### Community Safety

- 14.1 There are no community safety implications

#### Sustainability

- 14.2 The Stroud Local Plan has been through a full Sustainability Assessment process , so any sustainability issues have been addressed.

#### Staffing & Trade Union

- 14.3 There are no staffing and trade union implications

### **Background Documents:**

Stroud District Local Plan : Pre Submission Draft : Draft for Consultation September 2013