1.0 Purpose of Report

1.1 For Members to respond to a statutory consultation from Tewkesbury Borough Council in respect of a mixed use planning application (reference 12/01256/OUT) for an urban extension on the edge of the City for 1,500 dwellings, associated community infrastructure and 3.3 ha of employment land.

2.0 Recommendations

2.1 That Members support the principal of an urban extension to the east of the City at Brockworth and that officers forward the comments set out in Section 4 of this report to Tewkesbury Borough Council in response to the neighbouring authority consultation.

3.0 Background

3.1 An outline planning application was made to Tewkesbury Borough Council on 21 December 2012 for a mixed-use development on the eastern edge of Gloucester City. The proposal includes up to 1,500 dwelling, extra care housing, community facilities and local shops (totalling 2,500m2), B1/B8 employment uses (totalling 22,000m2) and a health facility.

3.2 While the application falls entirely within the administrative boundary of Tewkesbury Borough, it is located on the periphery of the City and therefore the City Council has been invited to comment.

Development Plan Context

3.4 In providing a response to this application, it is important to consider the current development plan status in which this application is being considered.

3.5 The current development plan for Tewkesbury Borough comprises the Regional Planning Guidance for the South West 2001 (RPG10); the saved policies of the Gloucestershire Structure Plan Second Review 1999 (SP); and the saved policies of the Tewkesbury Borough Local Plan 2006 (LP).
3.6 While not part of the statutory development plan but of significant material consideration is the Draft Regional Spatial Strategy for the South West that had reached an advanced stage following an Examination in Public and the Secretary of State’s Proposed Changes published in July 2008.

3.7 In order to establish a development plan for the borough, Tewkesbury is at present working with the City on the Joint Core Strategy (JCS) that once adopted will become the statutory development plan for both authorities.

3.8 The Joint Core Strategy has been subject to two periods of public consultation to date. These were:

- Issues and Key Questions 2009
- Developing the Preferred Options 2011

3.9 At present a Preferred Option JCS document is being prepared and this is due to be considered by all three JCS authorities at the end of June 2013. This will establish the level of development and spatial strategy including the proposed development sites for the period 2011 to 2031.

4.0 Proposed Response

4.1 The following section of this report sets out how Members should consider responding to the consultation from Tewkesbury Borough Council.

Strategic Planning Context

4.10 RPG10 identifies 11 Principal Urban Areas (PUA) in the region, of which Gloucester is one and that these offer the best opportunity for accommodating the majority of development in the most sustainable way. It sets out that development should take place primarily within the defined Principal Urban Area and where this is not possible it should be in the form of planned urban extensions in sustainable locations with good access to the urban area by public transport, cycle and foot.

4.11 Urban extensions to Gloucester are then in principle consistent with RPG10 where they are demonstrated as sustainable locations for development, alongside development taking place primarily within the urban area. The principle of urban extensions is therefore supported.

4.12 While RPG10 set out that urban extensions are in principle the most appropriate sustainable locations for development, it does not identify the location of these for Gloucester. The Draft RSS, however, in 2008 identified an area of search for an urban extension to the Gloucester PUA north of Brockworth in the location of the current planning application. This was also for 1,500 dwellings. While Members should note that the Draft RSS was never adopted, nor is it likely to be, the Secretary of State has attached significant weight to its proposals in recent appeal decisions, including recently within the JCS area itself. The location of the proposal is within the area of search identified within the Draft RSS and supported by Sustainability Appraisal Strategic Environmental Assessment Evidence. On this basis the location of the proposal conforms strategically with the Draft RSS, to which the Secretary of State is currently attaching significant weight.
4.13 The Joint Core Strategy Developing the Preferred Options Consultation Document published in November 2011 consulted on a number of urban extensions to the City including a potential location at Brockworth for 1,500 dwellings. Members should be aware, however, that while this was published in November 2011 it is not until the agreement of the Preferred Option JCS, programmed for Councils in June 2013, that the document will contain the three Council’s agreed development requirements or preferred distribution strategy.

4.14 While the final agreed development strategy will not be agreed until June 2013, the JCS process has collated a significant level of development, not least evidence on the level of housing needed in the JCS area. The evidence for the JCS area indicates that the City will continue to grow and expand and its capacity to accommodate development within its own boundary cannot be met from within the urban area alone. Equally those locations on the edge of the City will also continue to grow and generate need for housing which should be accommodated in sustainable locations. The JCS evidence indicates clearly that there is a need for peripheral development on the edge of the City to accommodate not only the City’s needs but also the needs of the JCS area and as such urban extensions are appropriate and can be supported where they at sustainably located and deliverable.

4.15 Members are advised that an urban extension to the east of Gloucester, as proposed conforms to the strategic planning context set out above and can be supported.

Affordable housing

4.16 The following comments are related to the Affordable Housing Statement produced by Stuart Larkin in relation to the planning application for Perrybrook.

4.17 Gloucester City Council supports the approach to provide extra care housing on such a large development site but would suggest evidence is needed to demonstrate a need for the 150 units proposed in this application. The design and location of extra care housing is important, especially in relation to community and health facilities, access to public transport and shops. We would recommend that designs take account of the Housing for Ageing Population, Panel for Innovation. Gloucester City Council question the need to provide 150 extra care units of affordable housing and suggest a review is conducted to ensure a balance between market and affordable extra care units is achieved.

4.18 Gloucester City Council would recommend a review in the approach taken to safeguard affordable housing for ‘local people’ living, working or having a strong local connection to the Ward or Parish. We would welcome a Local Lettings Plan for the estate that is linked to the Gloucester Housing Market Partnership (GHMP), which currently provides affordable housing in Gloucester and Stroud for those living in Tewkesbury and vice versa. Gloucester City Council would favour a reasonable share of any affordable housing allocation between Tewkesbury and Gloucester given the proximity to the urban area of Gloucester in relation to the main towns in Tewkesbury. The Housing Needs Assessment produced by Fordham Research in 2010, identified that Tewkesbury Borough Council would need to meet 29% of the housing need for Gloucester within their boundary. This
would include both market and affordable housing. Gloucester City Council would therefore recommend an approach to incorporating a reasonable share of the allocation of affordable housing on this site towards delivering housing need in Gloucester. The shared approach to affordable housing is currently operating through the Gloucester Housing Market Partnership (GHMP), where development sites affecting multiple districts, such as Kingsway, Coopers Edge and Hunts Grove, have a shared access arrangement to affordable housing to jointly address housing need. This approach ensures affordable housing is allocated reasonably and ensure those in most need locally are provided equal access to needed housing.

4.19 In relation to the Quality of Housing and Tenure Mix, Gloucester City Council supports the plan to deliver homes in line with the Code for Sustainable Homes, however, would seek evidence as to why Code Level 4 cannot be achieved rather than Code Level 3.

4.20 Gloucester City Council supports the proposal to deliver at least 15% of affordable homes to Lifetime Homes Standards but there is no reference to the delivery of wheelchair accessible housing, which should be included in the proposal. In February 2013, Gloucester and Tewkesbury had 3,084 active applicants on Gloucestershire Homeseeker with a housing need of which 112 had stated a need for wheelchair accessible housing.

4.21 Gloucester City Council would seek clarification that the proposal can only deliver 30% of total housing delivered as being affordable housing. The Housing Needs Assessment produced for Tewkesbury Borough Council in 2009 by Fordham Research, identified the need to recognise three different tenure mix requirements to take account of urban extensions. In relation to the urban extension to the south of Tewkesbury, it was identified that the tenure mix requirement as being 60% market housing and 40% affordable housing. The recommended mix of affordable housing was broken further as 32% as social rent and 8% as intermediate (shared ownership and shared equity). The Affordable Housing Statement recommended a tenure mix of 70% market housing and 30% affordable housing, with 15% as social rent and 15% as intermediate housing. No reason has been given to why this application does not seek to deliver the affordable housing need identified for this area.

**Biodiversity**

4.22 The JCS 2011 phase 1 survey identified the orchard to the far east of the site as being of ‘particular ecological significance’. It also identified Hedgerows, broadleaved woodland and the wooded brook as wildlife corridors providing connectivity for a diversity of species. It does recognize that the majority of the site is a fairly intensively managed for arable agricultural purposes.

4.23 The Environmental Statement (ES) confirms the above but has gone into more detail. It is agreed that the subject to sympathetic treatment during construction and long term sensitive management it is possible that biodiversity interest can be maintained and indeed enhanced. However, to ensure there is no long term decline on the value of the orchards and brook corridor and to be in line with the National Planning Policy Framework (NPPF) requirement for net gains of biodiversity then a larger buffer between these assets and the proposed development is recommended.
Green Infrastructure

4.24 The draft Green Infrastructure (GI) strategy for the JCS is focussed around rivers and streams and their connectivity to the wider GI assets of the Cotswolds and River Severn. This application is therefore one of the key sites with Horsbere brook running through or bounding the site flowing from the Cotswolds a short distance to the East.

4.25 The GI target points in the draft strategy identify the following issues:

- Improve connectivity to the Cotswolds,
- Better access along Horsbere especially between Mill lane and Court road.
- provide a multifunctional green corridor along the brook
- Provide better access West trough the motorway and its junction.

4.26 Dealing with these in turn; the connectivity with the Cotswolds for those on foot and cycle does not appear to have been addressed. The A46 is a busy road and at the Mill Lane junction is very wide. We would hope that some sort of pedestrian/cycle crossing would be provided allowing access to the wider countryside along with appropriate signage.

4.27 Better access along Horsbere between Mill lane and Court road appears to be provided for and is to be supported

4.28 A multifunctional corridor along the brook is fundamental to the delivery of the GI strategy. Surfaced foot/cycle path should be provided for, along with enhancements to existing access. Of particular concern is the connection West from Court road. Here the developers are asked to work with the owners of the Court, the Church and the Parish Council to facilitate a through route either utilizing the existing footpath and/or the allotments. Existing footpaths along the brook are in an atrocious condition. If any sort of sustainable travel pattern is to be achieved then the quality of these will have to be addressed.

4.29 While there is no attempt to better access across the M5 it is understood that this is an exceedingly difficult task, however better provision though Valiant way would be an improvement

4.30 Generally the site is hemmed in by major roads with little connectively out to open countryside. Court Road/Brockworth road is one of the few ‘quiet’ routes out and it is hoped that more is done to calm this road and to make it more attractive to cyclists and walkers.

Drainage

4.31 The applicant has made the usual commitment to a sustainable Urban Drainage system (SUDs). While this is supported there is little to say as to what will actually be provided in terms of storage capacity and where it will be sited. Reference to infiltration is not particularly relevant as no large scale application in the Vale is ever drained in this manner.

4.32 While some reference to the existing drainage network is made in the ES, it is unclear if this has been translated through to the Masterplan along with any
strategic swale routes, attenuation ponds and other strategic SUDS infrastructure. While some balancing ponds have been identified there are large parts of the proposal that do not appear to be served by any form of attenuation.

**Design and Layout**

4.33 The planning application is an outline application, however, a number of points should be raised in respect of the proposal in the conceptual masterplan that are not considered in the preceding sections.

- The residential parcel of land to the west of the site should be considered for employment use only, fully acknowledging that this may reduce the development capacity of the site. The location is detached from the main residential area, not well integrated and traffic that is travelling to the employment land to the west of the site is likely to use the arterial route through the residential area.

- It is questionable as to the level and quality of employment that can be secured from a strategic urban extension from 3.3ha of employment land and is unlikely to offer high quality employment land to suit the needs of the local economy. The entire area to west of the site should be investigated for employment land or for Park and Ride facility.

- There is no provision for Gypsy and Traveller need which is a key local planning requirement and will be considered within the Joint Core Strategy. Urban extensions should consider how they can assist in providing for this sector of the community.

**5.0 Conclusions**

5.1 Gloucester City Council has been consulted by Tewkesbury Borough Council on the urban extension proposal for an outline planning application to the east of Gloucester City. This is a mixed use proposal for 1,500 dwellings and 3.3ha of employment land alongside associated community infrastructure. Section 4 of this report sets out how the City Council should respond to this application as a neighbouring authority and should Members agree, officers will forward the comments set out in Section 4 to Tewkesbury as a formal response to this consultation.

**6.0 Financial Implications**

6.1 There are no financial implications associated with this report.

**7.0 Legal Implications**

7.1 Gloucester City is being consulted on this planning application by Tewkesbury Borough Council and therefore there are no legal implications to this report.

**8.0 Risk Management Implications** (Authors to complete) Identify all key risks (scoring 8 and above) for the recommendation including the impact and likelihood of the risk occurring and what measures will be taken to mitigate the risk.
There are no risks associated with this report.

9.0 **People Impact Assessment (PIA):**
Please ensure you complete this section even if a PIA is not required.

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Is a PIA required?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Has an initial PIA screening been completed?</td>
<td>Yes</td>
<td>No</td>
<td>x Explanation: This is a consultation on a neighbouring planning application and no PIA required.</td>
</tr>
<tr>
<td>Has a full PIA been completed?</td>
<td>Yes</td>
<td>No</td>
<td>x Explanation: This is a consultation on a neighbouring planning application and no PIA required.</td>
</tr>
<tr>
<td>Is the PIA available?</td>
<td>Yes</td>
<td>No</td>
<td>x Explanation: This is a consultation on a neighbouring planning application and no PIA required.</td>
</tr>
<tr>
<td>Has the PIA identified any negative impacts on any protected characteristic or community cohesion?</td>
<td>Yes*</td>
<td>No</td>
<td>x *Please ensure PIA is available</td>
</tr>
</tbody>
</table>

**Any Further Relevant Information:**

Tewkesbury Borough Planning Application Reference 12/01256/OUT

10.0 **Other Corporate Implications (this may include Community Safety, Environmental, Staffing, Trade Union)**

There are no other implications associated with this report.

**Background Papers** : None

**Published Papers** : None

**Person to Contact** : Tim Watton
Tel: 396854
E-mail: tim.watton@gloucester.gov.uk