



STRATEGIC ALLOCATIONS REPORT

OCTOBER 2013

Gloucester
City Council


CHELtenham
BOROUGH COUNCIL


Tewkesbury
Borough Council

CONTENTS

	Page
1. Introduction & Methodology	3
2. Development at Gloucester	19
3. Development at Cheltenham	54
4. Development at Tewkesbury	85
Appendix 1: Map showing location of Broad Locations	
Appendix 2: Map showing location of Strategic Allocations	
Appendix 3: Amec Site Assessment Report	
Appendix 4: Landscape & Visual Sensitivity, & Urban Design Appraisal Report	
Appendix 5: Strategic allocation options	
Appendix 6: Strategic allocation option site areas and capacities	

1.0 JCS STRATEGIC ALLOCATIONS REPORT

Introduction

- 1.1 The purpose of this report is to set out how the strategic allocations in the JCS have been generated; it also considers how those sites make a valuable contribution towards delivering sustainable development and providing for the needs of the Joint Core Strategy (JCS) area over a twenty year period up until 2031.
- 1.2 Conclusions drawn from the wider JCS evidence base demonstrates that further development is needed to meet the needs of the JCS area and this must be delivered in a comprehensive, coherent way identifying strategic locations which benefit both the individual location and the wider JCS area within the context of the National Planning policy Framework (NPPF) and having regard to the JCS Sustainability Appraisal.
- 1.3 This report is a key piece of the JCS evidence base. This report goes beyond the original work of the Broad Locations Report¹ 2011 which considered all potential strategic development opportunities and realistic alternatives for future development in the JCS area and informed the 'Developing the Preferred Option' version of the JCS.
- 1.4 This reports pulls together all the key elements of the evidence base relating to site assessment and analysis. It is important to recognise that no single element of the evidence has greater weight than another, and in assessing potential strategic allocations the starting position is to understand what each elements of the evidence base is concluding and reaching a balanced approach and recommendation which reflects NPPF and helps to deliver the spatial strategy of the JCS.

¹ <http://www.gct-jcs.org/Documents/EvidenceBase/JCSBroadLocationReportwAppendixOne.pdf>

- 1.5 The 'Developing the Preferred Option' consultation document² proposed the development of six strategic allocations within the JCS area to meet development needs of the three authority areas. In addition, the document identified deficits, in terms of housing numbers, which would also need to be accommodated within the latter part of the twenty year plan period.
- 1.6 This report has informed the recommendations regarding the Strategic Allocations and debate via the JCS Cross Boundary Programme Board and member Steering Group and draws together constraint mapping, site boundary work and landscape and urban design work which was undertaken to support site selection, assessment of reasonable alternatives and refinement of options.
- 1.7 The general and specific requirements to deliver each allocation will be considered from this work drawing from the consultation responses received, so as to inform the preparation of the Pre-Submission Joint Core Strategy.
- 1.8 This report has been broken down into the three main centres within the JCS area – development at Gloucester, development at Cheltenham and development at Tewkesbury. For the potential Strategic Allocations this report provides further details with respect to:
- Indicative master planning
 - Density assumptions, phasing, trajectory planning
 - Significant features and specific issues to be addressed,
 - Mix and uses
 - Access and links
 - Links
 - Infrastructure
 - Other factors which could affect its suitability for development,
 - A conclusion on the potential of the proposed strategic development site to deliver the Joint Core Strategy

² <http://www.gct-jcs.org/Documents/PublicConsultation/DevelopingthePreferredOption/FinalJCSDPoconsultationdocumentCOMPRESSED.pdf>

Methodology – areas for study

1.9 Large peripheral areas around the urban areas at Gloucester, Cheltenham and Tewkesbury were identified for assessment as part of the Broad Locations Report 2011. The extent of the Broad Locations largely reflected an amalgamation of existing peripheral sites which have been promoted through each of the various Strategic Housing Land Availability Assessment (SHLAA) processes. A map showing the location of the Broad Locations is attached at Appendix One. It is within these Broad Locations that potential strategic development opportunities were sought.

1.10 The 'Developing the Preferred Option' version of the Joint Core Strategy identified six strategic allocations (identified below) and three themes to help deliver the development requirements. The three themes were; maximising economic opportunities, preventing the coalescence of Gloucester and Cheltenham and making the best use of infrastructure. These themes were illustrated by the use of question marks on plans and are explored within this report through some of the original Broad Locations. The proposed strategic allocations identified were:

- Land at Ashchurch, Tewkesbury
- Land at North West Cheltenham
- Land at South Cheltenham
- Land at Innsworth, Gloucester
- Land at South Churchdown, Gloucester
- Land at Brockworth, Gloucester

In addition eight areas within Broad Locations which were identified and tested are:

- C2 North of Cheltenham
- C5 West of Cheltenham
- C6 South of Cheltenham
- G2 Staverton Airport
- G3 Churchdown
- G8a North and east of Maidenhall at Highnam

- G8b South of Maidenhall at Highnam
- T3 Ashchurch

1.11 There were also two further locations included within the themes which have not been further considered through this work. These are at Bishop's Cleeve and also land adjacent to the Wheatpieces estate at Tewkesbury. There have been three allowed appeals at Bishop's Cleeve which provide up to 1,450 new dwellings at this location and it was not considered appropriate to identify further additional development in the form of strategic development beyond this in this plan period. Land adjacent to Wheatpieces is subject to extensive flooding as identified in the Strategic Flood Risk Assessment Level 1, and the pattern of the functional flood plain at this location makes any form of strategic development inappropriate. A map showing the location of all potential strategic allocations is attached at Appendix Two.

Constraint mapping & capacity testing - Amec Site Assessment work

1.12 Independent consultants, AMEC, were commissioned to identify the various key constraints to development and potential boundaries for strategic allocations. Their report, 'Joint Core Strategy Site Assessment/Capacity Testing' 2012 attached at Appendix Three of this report, provides a starting point to the process of identifying realistic capacity and developable areas within each of the six allocations and eight Broad Locations. This work did not consider the more detailed matters of landscape and visual sensitivity or any evaluation of wider urban design and linkage issues.

1.13 Boundary maps for each of the areas were prepared, using existing physical boundaries such as roads and railways where these existed. Principal constraints were mapped for each of the areas. (The principal constraints are listed in full at paragraph 1.2.2 of the Amec report).

1.14 In principle developable areas were then taken, up to the physical boundaries having regard to the constraint mapping. Where physical boundaries could not be readily identified, this resulted in extremely large developable areas, the extent of which would not normally be considered for potential development. The resultant maps demonstrate the extreme extent of the

potential developable area but this does not imply that the whole area should be developed.

- 1.15 Following on from this mapping exercise, AMEC calculated indicative capacities on the resultant developable areas. This excluded an allowance for open space, education, community facilities and infrastructure as the land-take for incidental uses associated with residential development. This discounting of 38% follows the same approach used by each of the Councils in their calculation of developable areas in their SHLAAs. An allowance was made for employment uses from this net developable area prior to the remainder of the area being considered for residential development at a density of 35 dwellings per hectare.
- 1.16 AMEC's report also considered phasing for each of the sites and highlighted key issues which may need to be considered in the delivery of any sites. This phasing was simply divided into Phase 1 and Phase 2 linked back to the plan period and two ten year periods of 2011-2021 and 2021-2031.
- 1.17 AMEC's report provides an important and valuable assessment of the sites and a starting point for the definition of sites. The mapping of constraints and potential boundaries has provided the basis for additional more detailed work. In some cases the sheer extent of the developable areas are such that realistic and deliverable site allocations for the plan period need to be developed out of a much wider area.

Landscape, visual sensitivity and urban design appraisal

- 1.18 AMEC's report provided an assessment of the sites in regard to a number of important constraints and provides the starting point for more detailed appraisal and assessment of these areas by the JCS authorities. This work was undertaken in respect of each of the proposed strategic allocations and the Broad Locations identified under themes, set out in paragraph 1.9 of this report.
- 1.19 The consideration of more detailed matters of landscape and visual sensitivity and an evaluation of wider urban design and linkages issues was then applied to each of the sites in order to provide 'developable area' options.

This work incorporates landscape sensitivities, strategic urban design principles and key site constraints to present optimum spatial responses. The landscape and urban design based spatial assessment of each site was required in order to build upon the AMEC work to generate a more refined spatial interpretation of the developability of each site. The Landscape & Visual Sensitivity & Urban Design Appraisal Report is attached at Appendix Four of this report.

Landscape and visual sensitivity

1.20 The landscape and visual sensitivity appraisal employed a broad brush approach to highlight approximate areas of landscape and visual sensitivities. Landscape character, quality, value and the degree to which the particular landscape element or characteristic can be replaced or substituted was appraised and assessed within a high, medium or low category.

1.21 Visual sensitivity was appraised according to the following criteria;

Low sensitivity

- Either no change or a substantial beneficial impact on existing view
- Limited scale of change in view with respect to loss or addition of features
- Low degree of contrast or integration of new elements and characteristics in terms of form scale and mass, colour

Medium sensitivity

- Moderate adverse impact or slightly beneficial impact on existing view
- Modest scale of change to view with some loss and/or additional features
- Reasonable degree of contrast or integration of new features/changes acceptable in terms of form, scale, colour

High sensitivity

- Substantial adverse impact where scheme could cause a significant deterioration in the existing view
- Considerable scale of change in the view with loss of features and large change to composition

- Extensive degree of contrast and change within the landscape or removing key visual landscape elements and character

1.22 It should be noted that in addition to the broad brush appraisal there exists more detailed landscape analysis in respect of some sites, these appraisals go down to a much finer grain and where available should be read alongside the landscape and visual sensitivity appraisal.

1.23 In terms of the landscape character, the following criteria were used in the assessment of land within strategic allocations;

Low character

- Degraded or damaged landscape structure
- Single land uses dominate
- Landscape character either completely destroyed or little remains
- Detracting features dominate

Medium character

- Distinguishable landscape structure, characteristic patterns of landform and land cover
- Scope to improve management of vegetation
- Mixed land use evident
- Some features worthy of conservation
- Some detracting features

High character

- Strong landscape structure, characteristics, patterns, balanced combination of landform and land cover.
- Appropriate management for land use and land cover
- Distinct features worthy of retention
- None or few detracting features

1.24 The high, medium and low areas of both landscape character and visual sensitivity appraisal were then mapped and used to directly inform the

identification of 'developable areas' which take account of wider urban design and linkage issues.

Urban design

- 1.25 The next step in the process is directly influenced by the landscape and visual area plans. Developable areas have been identified in those locations which avoid, wherever possible, areas considered to be both of high landscape and visual sensitivity. This focuses development in areas where impact will be minimised with regard to the openness and character of the wider landscape setting. The surrounding urban form, where existing, was also evaluated to ensure that emerging developable areas would not appear spatially incongruous.
- 1.26 The extent to which each site is affected by constraints to development will differ. The key constraints of flood risk, European protected sites and Cotswolds Area of Outstanding Natural Beauty have informed the production of the developable areas. Consideration has been given to the location of conservation and heritage assets where the creation of buffers has informed the extent of developable areas. Additional constraints will need to be considered through the detailed design and master planning stage.
- 1.27 The generation of the developable area plans also included an evaluation of the surrounding movement network to ensure that new development could be located and laid out so as to facilitate good levels of spatial integration with surrounding built and natural features. This aspect will be critical in ensuring that new development has clear opportunities to create well mixed and integrated communities rather than perpetuating development that encourages segregation and isolation.
- 1.28 The resultant developable area plans indicate a broad spatial blueprint for development that is strongly guided and informed by the landscape character and visual sensitivity appraisals together with a range of urban design issues. The plans suggest where new development could be effectively located to create integrated and rationale growth to the existing urban form rather than creating isolated and incongruous development. The plans also identify where

important linkages should be located between existing and new development in order to facilitate the objective to create well integrated communities.

Pulling together all the evidence

- 1.29 On completion of the studies outlined above, there was an additional exercise undertaken to consider the JCS evidence base information and studies on a strategic allocation basis, to further refine the potential strategic allocations. One or more options were provided for each of the potential strategic allocations to be considered through the JCS Cross Boundary Programme Board, JCS Member Steering Group and each of the JCS authorities to determine the sites for inclusion within the Draft JCS.
- 1.30 The evidence base underpinning the JCS is thorough and wide ranging. It comprises a number of internal and independent assessments provide the necessary information on which the emerging JCS has been founded. In terms of both the earlier Broad locations assessment and this work, the technical assessments provide the basis for the strategic allocations to be contained within the JCS. The evidence base will continue to be developed and a full schedule is provided on the JCS website. The following evidence was available to inform this work.
- Gloucestershire SFRA Level 1 & 2 (December 2007) (October 2011 & January 2013)
 - Landscape & Visual Sensitivity, and Urban Design Appraisal Report
 - Housing Evidence Review & assessment of housing requirements (Various 2010-2013)
 - Gloucestershire Renewable Energy Viability Assessment (2010 & 2011)
 - Gloucestershire Local Transport Plan 3 (April 2011)
 - Gloucestershire Waste Core Strategy (December 2012)
 - The Gloucestershire Landscape Character Assessment 2006 (January 2006)
 - JCS Employment Land Review (December 2010)
 - Gloucestershire SIDP (September 2010)
 - JCS Hotel Capacity Study (May 2009)
 - JCS Retail Study Phase 1 (December 2011 & July 2012)

- JCS Sustainability Appraisal & Habitats Regulation Assessment (Ongoing)
- JCS Urban Extension Definition Study (July 2010)
- JCS Broad Locations Report (October 2011)
- JCS AMEC Site Assessment Report Final
- Gloucester, Cheltenham and Tewkesbury Borough SHLAAs (2012)
- JCS Green Belt Assessment (September 2011)
- JCS Landscape Characterisation Assessment & Sensitivity Analysis (October 2013)
- JCS Strategy (part of development plan document)

1.31 Two particular elements of the evidence base which were used in the refinement of options for the strategic allocations were the technical reports regarding flooding and the independent assessment of the Green Belt. The approach to these elements in the strategic allocations work is set out below.

Flooding

1.32 The approach to the identification of strategic sites was developed using the sequential approach set out in the extant guidance to support PPS25 Flood Risk and informed by the production of a Strategic Flood Risk Assessment Level 1 and 2. The work done to refine the strategic allocations drew heavily on the SFRA reports and the developable areas included in the strategic allocations in the Draft JCS sit within Flood Zone 1. The sequential approach was followed to avoid any development in Flood Zones 2 or 3 and the plans reflect this.

Approach to considering sites within the Green Belt

1.33 The majority of Broad Locations within which potential strategic allocations have been considered through further sites work are within the Cheltenham/Tewkesbury Green Belt and as such a consistent approach has been applied with regards to their recommendations for site selection and boundary changes.

1.34 Assessment of the Green Belt was essential both as a response to the evidence on housing land supply which clearly identified that need could not be met within exiting urban boundaries of the Gloucester and Cheltenham

and in the context of NPPF which only allows for redrawing of Green Belt boundaries at the strategic level of plan making.

Evidence base for the Green Belt review

- 1.35 The Green Belt Assessment carried out by AMEC (2011)³ represents the most up to date piece of evidence which provides an independent evaluation of the wider Green Belt within the JCS area. It is a comprehensive assessment which considers how strategic segments of the Green Belt perform against the purposes of including land within Green Belt. It does not in itself remove land from the Green Belt, and represents one part, albeit an important one, of the entire Joint Core Strategy evidence base. This study is significantly more detailed and provides a more thorough and comprehensive study of the Green Belt than has previously been undertaken. It assesses the entire extent of Green Belt rather than focussing on specifically identified areas and provides recommendations for the JCS authorities to consider. This is an independent technical piece of work which was commissioned and funded by the JCS authorities and provides the starting point for consideration. It does not, nor should it, provide an assessment based on the level of development required.

Methodology

- 1.36 Most of the sites being considered further within this sites work are within the Green Belt and their location therein has not precluded the consideration of strategic development options in any of the locations. The Green Belt is a policy designation and cannot be regarded as a physical constraint such as flood risk or topography. The list below is those areas within which strategic allocations have been considered through this sites work. (Those in brackets are not within the Green Belt)

- (T2 MOD)
- (T3 Ashchurch)
- C2 N Cheltenham
- C3 NW Cheltenham
- C5 W Cheltenham

³ <http://www.gct-jcs.org/Documents/EvidenceBase/JCSGBReviewFinalSept2011.pdf>

- C6 a&b S Cheltenham (part)
- G1 Innsworth
- G2 Airport
- G3 S Churchdown
- G4 Brockworth
- (G8 a&b Highnam)
- G9 S Churchdown

1.37 The AMEC assessment uses a traffic light approach to assess segments of the Green Belt as to whether they make a significant contribution, contribution or limited contribution towards the purposes of including land within the Green Belt. Below this, the report includes detail on how the segment performs against each individual aspect of Green Belt purpose. The majority of the land within the Cheltenham/Tewkesbury Green Belt is considered to make a significant contribution.

1.38 One approach would be to restrict development to only those areas which make a limited or medium contribution. The consequence of this would be to automatically rule out development at;

- C2 N Cheltenham
- C5 West Cheltenham
- C6b South Cheltenham (South of Up Hatherley Lane)
- G2 Airport
- G3 S Churchdown
- G9 S Churchdown

1.39 This would be the simplest and perhaps purest approach and would be consistent with the evidence base. However, it is unlikely that it would allow for sufficient development at the periphery of Cheltenham and Gloucester to enable them to meet their needs. The evidence base, in conjunction with a strategy that provides for urban extensions, can be used to argue that that such an approach could be used. The JCS has robust evidence which indicates the extent of the Green Belt which makes a significant contribution and that sufficient capacity would not be provided. This would have significant implications for the rest of the housing market area under the duty to co-

operate and would not demonstrate to an Inspector that all realistic opportunities and reasonable alternatives had been assessed in meeting the objectively assessed needs of the JCS.

1.40 The alternative approach, and the one which has been taken forward, is to consider the detail sitting behind the AMEC assessment of each individual segment. The report provides a useful matrix of Green Belt assessment results which individually assesses the contribution each segment makes to;

1. Check the unrestricted sprawl of large built up areas
2. Prevent nearby towns from merging into one another
3. Assist in safeguarding the countryside from encroachment
4. Preserve the setting and special character of historic towns

1.41 Those segments which provide a significant contribution in all 4 categories have not been taken forward for strategic allocations. This provides a simplistic, but consistent approach, to the consideration of Green Belt in the assessment of potential strategic allocations. The result of this approach is that the following location;

- C2 N Cheltenham (scores 4/4)

is not recommended as a strategic allocation to progress. More detail is set out later in this report.

Longer term boundaries

1.42 Whilst considering the potential for strategic allocations, consideration has been given, not just to removal of land to facilitate urban extensions, but to the longer term boundaries to ensure permanence as per the NPPF. The review of the Green Belt and redrawing of boundaries and highlighting of 'safeguarded land' is a piece of work which has been undertaken during and following this site assessment work. The approach is to ensure the use of hard, defensible boundaries, such as physical constraints which will endure for the long term. This includes roads, watercourses and other natural features. The segments used by the AMEC report are already helpful in this regard, and in conjunction with Cheltenham's earlier study of the Green Belt,

undertaken by consultants AERC, which specifically evaluates Green Belt boundaries, both an inner and outer revised boundary can be drawn.

Indicative capacity assessments

- 1.43 In order to establish a residential capacity for each Strategic Allocation, the methodology set out in each of the JCS SHLAAs has been used. The total potential area at each strategic allocation has been measured to give a gross site area. To provide a net developable area calculation, a density multiplier is used, which makes an allowance for land required for infrastructure, open space and community facilities and then applies density assumptions to the remainder of the site.
- 1.44 The density multiplier approach discounts 37% of the total land area and a density of 40 dwellings per hectare has been assumed. This provides a reasonably generous allowance at each of the strategic allocations for such uses as community facilities, public open space, infrastructure etc. This density may change based upon detailed masterplanning on a site by site basis.
- 1.45 In addition, capacity estimates can be determined through existing planning information (e.g. allocation or planning brief, or information provided by the landowner/agent, for example in preparation for the submission of a planning application).
- 1.46 The Landscape & Visual Sensitivity work which was undertaken to support the identification of potential developable areas took a slightly different approach. The Developable Area plans were produced to facilitate development that “fits” as comfortably as is practical with the surrounding urban form; this included identifying important open spaces that should be retained in order to provide an appropriate landscape context to new development and to act an appropriate “buffer” between the development and the wider landscape setting. These buffers are strategic in scale and are in addition to any internal landscaping or further peripheral landscaping that would be identified through detailed masterplanning.

- 1.47 These “development related” open spaces, are not included within the calculations for the developable areas. However the approach taken in the identification of developable areas has already factored in an element of development related open spaces, and, to avoid double counting, it is therefore considered that a reduced allowance is made. Taking this as an assumption, capacity calculations used a 30% allowance, rather than the usual 37% of land discounting.

Engagement with developers

- 1.48 The emerging developable areas have been subject to consideration by the development industry. Those with or promoting land interests have been engaged in this process, and a series of meetings were held in summer 2011 for each of the original Broad Locations. Historic and emerging evidence regarding each Broad Location was compiled and used to facilitate discussion. The meetings enabled the compilation of up to date information held by developers representing the broad location areas, regarding key issues, studies undertaken, mitigation measures, contact with infrastructure providers, capacity testing etc.
- 1.49 Further meetings were held in spring 2012 with those who had land interests which could be considered within the proposed strategic allocations. Following these meetings, all of those with or representing land interests were contacted to confirm their commitment and ability to deliver their site.
- 1.50 Key stakeholders and specific consultees have fed into the process throughout and targeted consultation has helped to inform and develop the extent of each of the urban extensions and the policies through which these can be shaped. Prior to the publication of the Draft JCS, informal consultation and workshops were undertaken with the JCS Policy Advisory Group to consider the strategic allocations and supporting policies.
- 1.51 There has been internal consultation within each of the JCS authorities throughout the process and for each of the potential sites, information has been collated from the SHLAAs, the JCS and wider evidence base, previous planning history (where relevant), and infrastructure studies. All this information has been evaluated and overall assessments provided on the

potential of each identified strategic allocations. A sustainability appraisal has been undertaken on all of the potential strategic allocations and the options considered.

2.0 Development at Gloucester

Analysis of potential Strategic Allocations

- 2.1 Updated capacity assessment work has identified an approximate urban capacity for Gloucester City of approximately 7,654 dwellings. Potential development land was identified all around the City. Nine Broad Locations were previously identified on the periphery of Gloucester and the assessment of the potential for development at these general locations was set out within the Broad Locations report (October 2011).

Filtering exercise

- 2.2 From the original nine Broad Locations, three have not been explored further through this work. G5 at Gloucester Business Park is subject to existing planning permissions which cover a large proportion of the Broad Location for both the Cooper's Edge development and Gloucester Business Park. Gloucester Business Park performs very strongly as part of Tewkesbury Borough's employment land portfolio and is currently afforded a high level of protection against uses other than traditional employment uses. The JCS Employment Land Review: Site Assessment of Business Parks recognises that it is one of the highest profiled sites in the County with a large range of business uses. This site should be retained as a strategic location for employment growth and will continue to develop through the plan period.
- 2.3 Broad Locations G6 and G7 both fall largely outside the administrative areas for the three authorities and at this stage the potential for further development has not been explored. Should additional land be required to help meet the need for housing and employment development, then one of the options would be to explore cross boundary development through the duty to co-operate.
- 2.4 Six of the Broad Locations have been considered further and a map indicating the location of these potential Strategic Allocations is attached at Appendix Two of this report. Identified below is an assessment of the different development directions.

G1: Land to the north of Gloucester at Innsworth

Introduction and context

- 2.5 Broad Location G1 to the north of Gloucester includes agricultural land adjacent to Longford and Innsworth. The Broad Location is directly adjacent to Gloucester City, but falls wholly with Tewkesbury Borough. This Broad Location is approximately 3.5km north of the City Centre and is well related to the existing built up area of Innsworth.
- 2.6 The functional flood plain passes through the centre of the site from north east to south west; dividing the Broad Location into three distinct parts. The southern part of the broad location is largely affected by flood zone 3b and 3a. There is a wide strip of land running south west through the Broad Location which falls within flood zone 3b.
- 2.7 The site lies wholly within the existing Green Belt. The Green Belt Review (Amec 2011) considers land in this location to make a limited contribution towards the purposes of including land within the Green Belt.

Landscape and visual impact

- 2.8 The Broad Location has undergone agricultural intensification resulting in quite large fields with some heavily degraded hedgerow boundaries (replaced with post and wire) and a loss of brook corridor vegetation. Although a contrived landscape, swathes of semi-mature trees, stands of mature deciduous and coniferous trees, and a roughly vegetated Hatherley Brook corridor create a visually unobtrusive landscape that helps to screen views of the military buildings. Generally landscape intimacy, hedgerow condition, and historic importance increases north of the Hatherley Brook; however the SSSI at Drymeadow Farm is important to biodiversity. Historic landscape at Down Hatherley is of particular interest and should be taken into account when considering the area for future residential development.
- 2.9 Areas of low landscape sensitivity lie to the south of the Broad Location and include the area the subject of the existing outline application at Longford, the decommissioned water treatment works at Longford and land to the north and east of Innsworth.

2.10 The Site of Special Scientific Interest (SSSI) located in the centre of the site is identified as high landscape sensitivity, the whole of the remainder of the Broad Location is identified as medium landscape sensitivity. The SSSI is in an unfavourable condition and will continue to decline long term due to the isolation of the site from like habitat. Development could result in significant biodiversity benefits. The SSSI is currently surrounded by arable land and there is potential to enable its re-connection to the wider habitat.

2.11 The overall sensitivity has been classified as low. Key considerations incorporated into the Landscape & Visual Sensitivity plans;

- The area is predominantly a flat, agricultural landscape with very little ecological and character qualities which could be easily replaced or substituted except for one small area of higher value around the designated SSSI.
- The main key receptor would be from Tinkers Hill/Churchdown Hill to the south east of the site which carries views across the vale.

What the urban design work has to say

2.12 This work sought to identify areas suitable for development within the Broad Location while meeting the following criteria;

- Extending existing movement networks to create appropriate and legible connections to ensure development is successfully integrated within existing settlement patterns
- Retaining and utilising existing field patterns and boundaries to define the new development edge in order that a new urban edge would appear more naturally formed and to provide an organic boundary to the wider landscape setting.
- Locates proposed employment areas near or adjacent existing employment sites.

Further to pursuing the above criteria the work identified 2 options for the Broad Location;

Urban Design Option 1

2.13 This option identifies a broadly rectangular area for potential development in the area of low landscape and visual sensitivity that lies to the north of

Innsworth residential area and to the west of Imjin Barracks. The area identified as suitable for development is defined on the whole by existing field boundaries, no additional linkages to improve highway infrastructure into or out of the site are identified. This proposed development area is situated adjacent to an existing residential and employment area and MOD site, it relates well to the existing urban edge and provides a natural extension to the built form to the north of the wider Gloucester urban area.

- 2.14 The option also includes a smaller site to the north of the broad location at Twigworth which would allow small scale development on an area identified as having a medium level of visual sensitivity that lies between a static caravan park and linear plot land development. This site is too small to be considered as a strategic urban extension but may be suitable as a local plan 'rural area' allocation.

Urban Design Option 2

- 2.15 Identifies all of the above plus a further small site to the east of Twigworth and to the south of Down Hatherley Lane in the north of the broad location which the study considers could be relatively well absorbed into the existing surrounding development patterns. This site is also considered to be too small to be a strategic urban extension but may be suitable as a local plan 'rural area' allocation.

Consultation - what you told us

Green Belt

- 2.16 Some respondents felt that homes in Green Belt around Innsworth are unacceptable. The loss of Green Belt land was of concern as and it was felt that this land had been protected from development for the right reasons. Conversely, it was set out that land north of Gloucester at Longford, Innsworth and Twigworth had been consistently identified as making a limited contribution to Green Belt purposes.

Recreation and Open Countryside

- 2.17 Many of these responses were made in light of the need to use brown field sites first along with vacant office and industrial sites rather than green field sites. In this context, it was also expressed that landlords of empty homes

should be put under pressure to fill their empty properties to reduce the need for green field sites. Other comments were received that indicated that green infrastructure would be improved in the area and there would be benefits to biodiversity and enhancements to the Site of Special Scientific Interest in this location.

Infrastructure

- 2.18 Some respondents felt that additional housing in this location would destroy the quality of life for existing residents due to the pressure on existing resources and vastly increased traffic. It was considered that additional housing would exacerbate congestion on Cheltenham Road East, Frogfurlong Lane and Down Hatherley Lane, particularly at peak times. Poor transport links were considered to be a disincentive to new businesses. However, others stated that it was an accessible location being on the northern bypass, particularly to businesses, and that it provided opportunities to improve existing infrastructure, including open space, road infrastructure and educational facilities. It was also cited as a sustainable location and that it would aid the regeneration of Gloucester City.

Flooding

- 2.19 Concerns about flooding generally and the levels of flooding experienced in this area in July 2007 were raised. The adverse effect on properties in Down Hatherley was cited. However, it was also cited that the area proposed for development was outside of the existing floodplain.

Alternative Sites/Approaches

- 2.20 Suggestions for alternative sites included Imjin Barracks, land east and south of Tewkesbury and land at Bentham. There was support for the land at Innsworth as it was felt that it maximised economic opportunities with access to both Cheltenham and Gloucester although it was felt that the site must be well planned and deliver the necessary infrastructure and community needs.

Highways

- 2.21 There are significant existing highway capacity issues along Innsworth Lane that need to be addressed in order for Option 1 to be considered acceptable by the highway authority. Option 2 does not include any integration between

the north and south of the site which is subdivided by the Hatherley Brook and its associated floodplain.

Sites Assessment

- 2.22 The key challenge for this area is to provide development which has the potential to integrate into and complement the existing settlement pattern, recognising the existing settlements within the wider Broad Location. The extent of the flood plain within this Broad Location creates difficulties in terms of providing a comprehensive urban extension. Two options were drawn up for this potential strategic allocation and are attached within Appendix 5.

Option One

- 2.23 This option provides for a sensitive extension to the built form at Innsworth which creates a developable area within the land outside the functional flood plain. This option creates a mixed use development with approximately 11 hectares of employment land adjacent to the existing Innsworth Technology Park.

Option Two

- 2.24 This option includes the developable area within Option One and includes land to the north of the Hatherley Brook and to the south of the A38 and Down Hatherley Lane. This would not be an urban extension per se as it would not lie immediately adjacent to an area with substantial services and facilities, but would need to draw on the services and facilities of Gloucester city centre. This option would potentially require a greater amount of community and social infrastructure to address the existing lack of these services in the area.

Conclusions

- 2.25 The JCS strategy is of maximising urban capacity, and focussing development on Cheltenham and Gloucester as the two urban centres. It is recognised that Gloucester cannot meet its identified needs in full within its administrative boundaries and through the duty to co-operate; urban extensions are being proposed to help towards this unmet need. It is difficult to reconcile the ability of this location to form a comprehensive urban

extension with a significant swathe of land between two distinct parcels of land which is significantly constrained by flooding.

- 2.26 The need for housing is a key consideration which must be balanced against the second option. To recommend that option two is taken forward within the plan is done on the clear understanding that it must be demonstrated and evidenced that a comprehensive and integrated urban extension can be delivered at this location.

G2: Land at Gloucestershire Airport

Introduction and context

- 2.27 Broad Location G2 covers a significant part of the area between Cheltenham and Gloucester and is located wholly within Tewkesbury Borough. It is located centrally between Gloucester and Cheltenham and offers easy access to existing infrastructure networks, including the M5 Motorway, A40 and existing public transport networks. This land stretches beyond the A40 to the railway line in the south and is bordered by the M5 motorway in the east.
- 2.28 While the land is predominantly flat and forms a visually important wedge between two urban areas it also contains the built up area of Staverton, Gloucestershire Airport and airport related structures including hard runways and peripheral airport related hangars; Brickhampton Golf Club and the A40 dual carriageway between Gloucester and Cheltenham.
- 2.29 This Broad Location covers an extensive area and the search for a strategic allocation has been focussed on land to the north east of Churchdown between the existing urban edge and the airport, and the land that comprises the airport itself.
- 2.30 There are two strips of land within this Broad Location which fall within Flood zone 3b, which pass around the airport and converge at Brickhampton golf course. The land within flood zone 3b to the north of Churchdown village is a distance beyond the established built form and maintains this distance around the golf course.

2.31 This Broad Location lies entirely within the Green Belt and has been assessed in the Amec report to make a significant contribution towards the purposes of including land within the Green Belt.

Landscape and visual impact

2.32 The landscape sensitivity varies across the area. To the north west of the broad location the landscape is identified as medium-low sensitivity whilst towards the centre the landscape is considered to be less sensitive. To the west of the airport the sensitivity increases to medium. Tranquillity is reduced by the busy A40 and airport to the immediate north. Towards the south of the broad location the landscape sensitivity is high-medium. This area of the site is considered to have a strong rural character with some good quality component features. The area to the south provides high informal recreation value cycle links to Cheltenham, and is occupied by a playing field and playground in the west.

2.33 The overall sensitivity rating of this area has been classified as medium to low. Key points include the following;

- The Broad Location is a large area with little distinguishable features worthy of retention except the narrow green corridor along Norman's Brook.
- Landscape character has been damaged and degraded and is dominated by single land use
- The Broad Location is influenced by built form including industrial units, major roads, railways and edge of residential development.

What the urban design work has to say

2.34 Key considerations within the Staverton Developable Area plan;

- Developable area to the south of the site is effectively a rationale extension of existing settlement pattern.
- Creating a staggered edge treatment that utilises existing field boundaries mitigates against forming a highly visible feature in the wider landscape setting, and helps maintain an appropriate transition between built form and landscape setting.

- Redevelopment of the airfield site itself is wrought with implications...is the site viewed as an important strategic asset for the region? Is the erosion of the relatively open green space between Cheltenham and Gloucester an important issue? Development of this site would potentially result in a development that is not integrated with surrounding urban form.

Consultation - what you told us

Green Belt

- 2.35 Respondents are strongly in favour of resisting the merging of Cheltenham and Gloucester and maintain that the Green Belt generally should be protected from development. Brickhampton Golf Course was also proposed to be removed from the Green Belt.

Airport

- 2.36 Comments were received proposing the closure of Gloucestershire Airport and that all the houses needed in the area could be built there without damaging the Green Belt. In contrast some respondents indicated that other smaller airports in UK have shown they can act as a focus for economic activity and employment growth despite Green Belt or environmental designations. It was suggested that flexibility is needed in considering the economic potential of the airport.

Sites Assessment

- 2.37 The key consideration for further residential, employment or airport related development in this area will need to be balanced against the role this location plays in fulfilling Green Belt policy and the function of the Airport. Four options were drawn up for this potential strategic allocation and are attached within Appendix 5.

Option One

- 2.38 It is considered that land known as Parton Farm between the existing built area and the airport could deliver a residential scheme of approximately 845 dwellings. It is anticipated that this figure may reduce once further constraints at Parton Farm are known relating to the airport safety areas. A new access can be achieved from the B4063 and existing access points utilised from Parton Road.

Option Two

- 2.39 This option includes the same area and quantum of residential development as option one, but also a small area of approximately 5ha of employment land off the B4063 at Staverton adjacent to the existing employment area. This option may encroach onto part of an existing run way so may affect the existing operational activities capacity of the airport which requires a number of run ways to take account of different weather conditions for take-off and landing.

Option Three

- 2.40 This option includes the residential capacity of Option 1 plus a strategic employment allocation of approximately 25ha of employment land to the south of the broad location adjacent to the A40 Golden Valley which would be accessed via a new junction from the A40.
- 2.41 A large employment allocation at this location could impact on other proposed employment areas at other strategic allocations. This option retains the longest, recently extended runway as an operational asset at the airport.

Option Four

- 2.42 This option involves the whole-sale mixed use redevelopment of the airport and could provide between 700 and 3,300 new dwellings and/or 25-116 ha of employment land. Such a development would be required to be supported by a new all-ways junction from the A40 Golden Valley.
- 2.43 The strategic social and community infrastructure required to support such an allocation would also be required. This would not be an urban extension so much as a new settlement. However, this would not fit the strategy set out in the JCS.

Conclusions

- 2.44 This Broad Location has the potential to deliver both residential and employment development. This location has good transport links being in close proximity to the M5 motorway and the strategic highway network linking both Cheltenham and Gloucester and the surrounding hinterland of both settlements.

- 2.45 Additional work needs to be undertaken on capacity at Parton Farm as the Civil Aviation Authority safety zones are yet to be identified further to the extension of the main runway at the airport and additional work needs to be undertaken on potential archaeological assets that may affect development capacity on this parcel to the north of Churchdown.
- 2.46 The airport provides a key regional transport asset and should be retained for the economic benefits it brings to the County and beyond. There are existing saved policies within the Tewkesbury Borough Local Plan which relate to the airport and aviation related development. There is an opportunity through the JCS to provide some greater flexibility relating to the airport and the development which would, in principle, be permitted to take place there.
- 2.47 Options two, three and four all propose development within the boundary of the airport, which could restrict the operation of the airport. It is recommended that of all the options, that Option One be considered for inclusion as a strategic allocation providing a strategic level of residential development at this location.

G3: Land at Churchdown

Introduction and context

- 2.48 Broad Location G3 includes land to the south of Churchdown and extends from the A40 in the west to the M5 motorway in the east. It skirts the existing built area of north east Gloucester to the south and Churchdown to the north. This broad location includes Chosen Hill which is a local visual landmark and an important area of open space as well as an area of local landscape importance. Much of G3 is covered by a landscape designation relating to the protection of Churchdown Hill. Several public footpaths cross the site in an east/west direction. Development at the western edge of the broad location is constrained by large electricity pylons which run north/south across the site.
- 2.49 The entire area is located within the Green Belt and the Amec Assessment considers land in this location to make a significant contribution towards the purposes of including land within the Green Belt. The vast majority of land

falls within flood zone 1; however there is a small strip of land within the functional floodplain within close proximity of the Barnwood roundabout in the south west area of the area.

- 2.50 The County Council have consulted on the provision of a Park and Ride scheme at Elmbridge Court in the north west of the Broad Location and highways improvements to Elmbridge Court roundabout as part of a former Nationally Significant Infrastructure Project, though it is no longer deemed as such.

Landscape and visual impact

- 2.51 Much of this Broad Location is covered by a landscape designation related to the protection of Churchdown Hill. It has mixed arable and pasture use enclosed by a hedgerow network which reflects the surrounding landscape character. There are several landscape features worthy of retention; predominantly a rectangular oak woodland near the centre of the site, known as Pirton Brake, and also a number of individual mature oak trees within hedgerows which are considered to be of medium landscape sensitivity.
- 2.52 The area adjacent to Elmbridge roundabout and to the immediate west of Churchdown has low visual sensitivity, with a buffer of medium visual sensitivity between these areas and the majority of the rest of the broad location to the east of the railway which is classified as having high visual sensitivity. The existing employment area at Elmbridge Court has low landscape and visual sensitivity.
- 2.53 The overall sensitivity rating has been classified as medium. Key considerations incorporated into the Landscape & Visual Sensitivity plans;
- Predominantly enclosed site but with significant views from Tinkers Hill/Churchdown Hill
 - Landscape character susceptible to change and has a value as a landscape visual resource more so to the west

What the urban design work has to say

- 2.54 The report suggests combining G3 and G9 to create a strategic allocation with a larger capacity. It also suggests the use of part of the site for employment purposes to reinforce the existing employment offer in the locality.

Consultation - what you told us

- 2.55 This area at South Churchdown/Elmbridge was not put forward as a potential strategic allocation in the JCS 'Developing the Preferred Option' document, and as such there is little direct reference to this area in the consultation responses. However the following is relevant in this location.

Green Belt

- 2.56 The loss of Green Belt land was of concern as its loss would lead to the merging of settlements. The Green Belt land here was not considered by some respondents to be as valuable as that in south Cheltenham. Others cited that development at this location would be able to be integrated into the existing urban area and not result in coalescence between Cheltenham and Gloucester.

Open Countryside, Farm Land, Flora and Fauna

- 2.57 It was felt by some that the loss of countryside at this location would have an adverse impact on air quality and spoil views from Churchdown Hill. It was disputed by some that the area had experienced a 'loss of tranquillity'. Others cited that the area was of low landscape sensitivity and that it offered an opportunity for a sustainable location for development.

Infrastructure

- 2.58 Some respondents set out that the current level of services in this area was thought to be inadequate to meet the needs of new residents and that the rent on any new employment sites needs to be affordable to attract new businesses. Others cited that development in Churchdown would be an ideal location in terms of infrastructure and would maximise economic opportunities. It was commented that the station at Churchdown should be reopened for commuting by rail and to maximise economic opportunities. An alternative view was that development of this site represents growth around planned transport infrastructure and was supported for this reason.

Flooding

- 2.59 It was considered that the area had not been fully tested in terms of flooding and that this raised concerns while others commented that the area proposed for development would not be within the flood plain.

Traffic Congestion

- 2.60 It was noted that there is existing congestion on Cheltenham Road East, Elmbridge Court Roundabout, Innsworth Lane and Frogfurlong Lane. Development of the fire station at Elmbridge Court Roundabout and the superstore at Hurrans will add to the congestion and make the Hare and Hounds junction even more dangerous. Others suggested that that development here is highly sustainable in terms of infrastructure and could provide opportunities to improve one of the most congested junctions on this part of the highway. This could be linked to the recently approved Elmbridge park and ride scheme.

Alternative Sites/Approaches

- 2.61 Support for development in Churchdown was expressed as it was considered to be an ideal location for commuting to Cheltenham or Gloucester. A new park and ride development is planned at Elmbridge and a Churchdown rail station could be reopened to make better use of the Cheltenham to Gloucester line. Additional housing would help support Churchdown businesses. Development at this location is away from floodplains and around transport infrastructure. It was felt that urban extensions were necessary to fully meet the housing need of the JCS area and that over reliance on brown field development may be neither viable nor deliverable in the current economic climate.

Sites Assessment

- 2.62 Pirton Court is a Grade II heritage asset with associated undated archaeological features. The setting of these buildings will need to be protected by an appropriate buffer zone. The World War II buildings comprising Elmbridge Court offices are undesignated buildings of historic interest, meriting recording in advance of development.

- 2.63 The Hatherley Brook should be identified as strategic Green Infrastructure linking to Churchdown Hill. The Special Landscape Area should be identified as local green infrastructure together with the links to the SGI and adjacent recreation grounds. The Broad Location is considered to have some significant ecological value as it contains some orchards and semi improved meadow plus mature and veteran trees and woodland which are covered by a Tree Preservation Order (TPO), these areas are of higher ecological value. These features would not necessarily preclude development at the Broad Location but would need to be taken into consideration for any master planning of the site.
- 2.64 As with many other Broad Locations, the area is quite extensive and the search for a potential strategic allocation has focussed in on that land which lies between the A40 Golden Valley and the railway and stretches from the south of Pirton Court in Churchdown to Elmbridge Court in the south. With regard to development two options were suggested.

Option 1

- 2.65 This option would comprise a local plan allocation with a small quantum of residential development between Pirton Court and Pirton Brake, accessed from the existing distributor road of Pirton Lane. This would be an extension to the existing residential area of Churchdown, it would need to preserve and enhance the character and setting of the heritage asset of Pirton Court as well as safeguard and enhance the biodiversity value of Pirton Brake which contains mature and veteran trees and is covered by a tree preservation order. This option would also include the Park and Ride proposed by the County Council and identifies an area for the possible extension of the Park and Ride at a later date.

Option 2

- 2.66 This option includes the residential and park and ride development described in Option 1 plus it identifies the southern part of the site as suitable for a large strategic employment land release. Strategic landscape buffers around the employment area are proposed adjacent to the railway line and the A40 Gloucester northern bypass. The electricity pylons that cross the southern part of the broad location effectively sterilise the southern part of the broad

location for development. Relocation or burying of the pylons would allow for a greater land take for development purposes.

- 2.67 This option would provide a large strategic employment land release for the Gloucester and Cheltenham area at a site that is very accessible from two motorway junctions and is well served by public transport options. The need to attract inward investment to the area and to support economic growth and job creation would in this instance be weighed against the policy objectives of Green Belt designation.

Conclusions

- 2.68 Both Option 1 and Option 2 for G3 allow for improvements to Sustrans Route 41 between Cheltenham and Gloucester, by re-routing the cycle path through the Broad Location from Churchdown to the Elmbridge Court roundabout. The location of the proposed park and ride within this area opens up this Broad Location for development, though its actual position within this wider area limits the developable area to a certain extent and the pattern of development and land uses which can be achieved. Should the park and ride not be delivered, development at this location may be reconsidered.
- 2.69 As a standalone option, development of this Broad Location would not be recommended. It should be viewed in the wider context of development proposed to the south of Churchdown and the cumulative benefits which can be delivered through a comprehensive approach to developing this area. Option 2 allows for a strategic employment site to be developed at this location and provides an employment allocation to the north of the City and maximise the potential for development. Option 2 should be taken forward with the appropriate option within G9: Land to the south of Churchdown.

G9: Land to the south of Churchdown

Introduction and context

- 2.70 This is a small Broad Location, G9, to the north of Gloucester, south of Innsworth. It is contained by residential development on three sides and bordered to the south east by the A40. It comprises two parcels of land falling

either side of the B4063. The larger parcel is situated to the south of the existing built form of Innsworth with Luke Lane to the north, the A40 Gloucester northern bypass to the west and the B4063 Cheltenham Road East to the south and east. The second smaller parcel is bounded by the B4063 to the north, the residential development of Grove Road and Yew Tree Way to the east and the A40 Golden Valley dual carriageway to the south.

- 2.71 Both parcels of land are currently used for agricultural purposes and provide visual separation between Gloucester to the south and Churchdown and Innsworth to the north. The land lies wholly within the existing Green Belt. The Green Belt Review (Amec 2011) considers land in this location to make a significant contribution towards the purposes of including land within the Green Belt. The land in the northern extent is currently used for sports pitches and is protected open space.
- 2.72 This site was proposed as a strategic allocation in the 'Developing the Preferred Option' version of the JCS. A Strategic Flood Risk Level 2 assessment has subsequently been carried out on land at this location which provides more detailed information on the sites performance with regard to flood risk. This has informed the potential developable areas at this location.
- 2.73 A high voltage power line carried by pylons crosses the west of the site following the line of the A40 Gloucester northern bypass. A small parcel of land at the south of the strategic allocation site and adjacent to the Elmbridge roundabout has recently been developed to provide a new fire station site.

Landscape and visual impact

- 2.74 The overall visual sensitivity rating for this site is medium; it is a predominantly enclosed site with views into the site from the main visual receptors of Tinkers Hill and Churchdown Hill. Key considerations incorporated into the Landscape & Visual Sensitivity plans;
- Predominantly enclosed site but with significant views from Tinkers Hill/Churchdown Hill
 - Landscape character susceptible to change and has a value as a landscape visual resource more so to the west

2.75 The landscape character is susceptible to change and it does have value as a landscape visual resource – more so to the west. Any development of this Broad Location should seek to ensure a green wedge is retained adjacent to the north of the A40.

2.76 This area contains no identified sites, key wildlife or otherwise. The area is dominated by large field patterns with poor hedgerow structure. This arable land is intensively managed. Features within the area include the over mature hedge on the B4063 (Northern side) and the tree lined ditch that flows through the area, both of which could be enhanced through development.

What the urban design work has to say

2.77 There are opportunities to utilize existing field patterns to define the new development edge to respect existing landscape features and characteristics. There are opportunities to create development that is more successfully integrated with existing settlement patterns, and the opportunity to maintain important green routes, corridors and spaces which would create an appropriately high quality sense of place.

2.78 The following bullet points relate to the developable area within G9 only. Key considerations within the South Churchdown Developable Area plan are;

- Utilises existing field patterns to define the new development edge in order respect existing landscape features and characteristics.
- Suggesting an extension of the existing movement network to facilitate appropriate and legible connections to create development that is more successfully integrated within the existing settlement patterns, particularly where there is a clear opportunity to link adjacent areas through a shared high quality landscape asset.
- Maintaining important green routes/corridors/spaces which contribute to the potential for development to create an appropriately high quality “*sense of place*”.
- Maintains an appropriate “green” buffer between greater Gloucester settlements and Churchdown.

Consultation - what you told us

Green Belt

- 2.79 The loss of Green Belt land was of concern as its loss would lead to the merging of settlements. The Green Belt land here was not considered by some respondents to be as valuable as that in south Cheltenham. Others cited that development at this location would be able to be integrated into the existing urban area and not result in coalescence between Cheltenham and Gloucester.

Open Countryside, Farm Land, Flora and Fauna

- 2.80 It was felt by some that the loss of countryside at this location would have an adverse impact on air quality and spoil views from Churchdown Hill. It was disputed by some that the area had experienced a 'loss of tranquillity'. Others cited that the area was of low landscape sensitivity and that it offered an opportunity for a sustainable location for development.

Infrastructure

- 2.81 Some respondents set out that the current level of services in this area was thought to be inadequate to meet the needs of new residents and that the rent on any new employment sites needs to be affordable to attract new businesses. Others cited that Development in Churchdown would be an ideal location in terms of infrastructure and would maximise economic opportunities. It was commented that the station at Churchdown should be reopened for commuting by rail and to maximise economic opportunities. An alternative view was that development of this site represents growth around planned transport infrastructure and was supported for this reason.

Flooding

- 2.82 It was considered that the area had not been fully tested in terms of flooding and that this raised concerns while others commented that the area proposed for development would not be within the flood plain.

Traffic Congestion

- 2.83 It was noted that there is existing congestion on Cheltenham Road East, Elmbridge Court Roundabout, Innsworth Lane and Frogfurlong Lane. Development of the fire station at Elmbridge Court Roundabout and the

superstore at Hurrans will add to the congestion and make the Hare and Hounds junction even more dangerous. Others suggested that that development here is highly sustainable in terms of infrastructure and could provide opportunities to improve one of the most congested junctions on this part of the highway. This could be linked to the recently approved Elmbridge park and ride scheme.

Alternative Sites/Approaches

- 2.84 Support for development in Churchdown was expressed as it was considered to be an ideal location for commuting to Cheltenham or Gloucester. A new park and ride development is planned at Elmbridge and a Churchdown rail station could be reopened to make better use of the Cheltenham to Gloucester line. Additional housing would help support Churchdown businesses. Development at this location is away from floodplains and around transport infrastructure. It was felt that urban extensions were necessary to fully meet the housing need of the JCS area and that over reliance on brown field development may be neither viable nor deliverable in the current economic climate.

Sites Assessment

- 2.85 The consideration for G9, like G3, is whether that as a standalone allocation it should be viewed as a strategic allocation. The findings of the additional SFRA work have impacted on the potential developable area which can be achieved.
- 2.86 The AMEC Green Belt report states that this area is critical to preventing the merger of Gloucester with Cheltenham. When viewed in plan form, in terms of being a critical area of land with regard to maintaining the strategic gap between the two urban centres G9 lies between Gloucester and Churchdown, it does not lie in the strategic open green gap between Churchdown and Cheltenham which is the area that effectively separates the built form of Gloucester and Cheltenham.
- 2.87 Having considered all the current evidence for this location, including the need to accommodate new housing development over the plan period there

are two options for G9 emerging from this work. Neither option includes the development of the existing playing field to the north of the Broad Location.

Option One

- 2.88 This option suggests a modest amount of development at the Broad Location in two parcels either side of the B4063 and restricts access into the site from the existing highway infrastructure in the locality rather than introducing a new access off the B4063 into either parcel. This option provides a modest level of residential development and retains a green wedge between Gloucester and Churchdown either side of the B4063 which could be utilized as open space and playing fields.
- 2.89 This option would allow for flood storage betterment upstream of Longford in accordance with the Level 2 SRFA. A new strategic landscape buffer would be provided to the north west of the Golden Valley dual carriageway. New pedestrian and cycle linkages would be provided from the development towards Innsworth across the unnamed ditch.

Option Two

- 2.90 Option two provides a more intensive development of the area and greater land take resulting in a larger scale development. This option would utilize all land in Flood Zone 1 and would be likely to require new access points into each parcel of the allocation from the B4063. This option retains a thinner green wedge between any new development and the A40 which reflects the footprint of the functional flood plain.

Conclusions

- 2.91 The options considered for both G9 and G3 do not provide a comprehensive strategic allocation individually. The development potential is limited and the level of residential units which could be achieved does not necessarily present an option which can be regarded as strategic in quantum alone. The individual infrastructure requirements may not amount to a level which would provide wider benefits to this area.
- 2.92 Should a strategic allocation be necessary at this location, the potential of options for both Broad Locations need to be drawn together and any

application for development of a strategic allocation would need to will need to demonstrate that it can be delivered as a comprehensive strategic allocation with an agreed master plan. To consider this further, two options have been assessed.

Sites Assessment for combined potential allocation

Option One

- 2.93 This option would comprise the combining of both Option 1 scenarios for each Broad Location and would result in the delivery of a level of residential development that cumulatively could be regarded as strategic. Option 1 also includes the delivery of a park and ride facility at Elmbridge Court, plus an area for the extension to this facility in the future. Option 1 includes the preservation and enhancement of the heritage asset of Pirton Court and the safeguarding of Pirton Brake woodland. It also includes the re-routing of Sustrans Route 41 from Churchdown through the area to Elmbridge Court.

Option Two

- 2.94 This option would comprise the combining of Option 2 scenarios for each of the Broad Locations and would result in the delivery of a higher level of residential development. The option also includes the provision of a strategic employment site at Elmbridge Court, to be accessed from the new junction to be provided on the A40 Golden Valley for the Park and Ride. All other features mentioned in Option 1 are also to be provided within Option 2.

Conclusion

- 2.95 The opportunities and benefits which can be delivered through a comprehensive allocation of land across both areas of search provide a more meaningful development return than the single parcels coming forward separately. This will enable the exploration of cumulative infrastructure requirements which may achieve the tipping points necessary to create on site facilities to the benefit of existing and future communities.
- 2.96 Option Two proposals for both G3 and G9 are put forward to create a single G3/G9 potential strategic allocation at this location which maximises the development potential at this location and is likely to generate the greatest

benefits as a result and provide a greater viability for any scheme which has to consider highway solutions at this location.

G4: Land to the north of Brockworth

Introduction and context

- 2.97 Broad Location G4 lies to the north of Brockworth and comprises existing playing fields, open space and agricultural land. The Broad Location, which falls wholly within Tewkesbury Borough, is approximately 5km east of Gloucester City Centre and is well related to the existing village of Brockworth, which itself has expanded considerably over the past 20 years with the redevelopment of the former Brockworth airfield to provide Gloucester Business Park & the new Coopers Edge residential development.
- 2.98 This Broad Location lies at Brockworth on land immediately south of the A417. It covers the area between the M5 motorway and Shurdington road and between the A417 and the built area of Brockworth. This Broad Location offers good access to the existing strategic road network. The A417, Shurdington Road and M5 Motorway provide clear and defensible boundaries for the future. A narrow strip of land along the southern edge of this Broad Location falls within flood zone 3b; otherwise the land is within flood zone 1.
- 2.99 The land lies entirely within the existing Green Belt. The Green Belt Review (Amec 2011) considers land in this location to make a limited contribution towards the purposes of including land within the Green Belt. Any development at this location would need to ensure that the potential impacts of noise are minimised. The heritage asset at Brockworth Court lies to the centre of this Broad Location and would need sensitive consideration through any development at this location.

Landscape and visual impact

- 2.100 The Broad Location is very intensively farmed with the exception of the small remnant orchard off Brockworth Lane and the very good orchard off the A46. Along the southern boundary following the urban edge is Horsebere Brook which creates a strong green corridor with a number of mature trees lining the

banks. The Horsbere Brook provides useful habitat and biodiversity in the Broad Location.

- 2.101 The land is currently used as arable farmland with a central levelled area used as playing fields. The existing hedgerows are of lower quality compared to the wider character area, however, there are a number of landscape features within the site worth retaining. In the east there is a small traditional orchard which reflects the original landform and the remains of an orchard near to Brockworth Court.
- 2.102 If the two orchard sites are maintained and a linear riparian strip along the brook is also maintained, then significant biodiversity improvements could result if development took place. There are opportunities for green infrastructure improvements around the strategic road network and to connect to the Horsbere flood attenuation scheme. There are opportunities for betterment with regard to the Horsbere Brook for further flood protection of properties downstream.
- 2.103 The western half of the broad location is considered to have low landscape sensitivity and the eastern half of the broad location medium landscape sensitivity. The Horsbere Brook which runs east west through the broad location is a strong green corridor and is identified as having high landscape sensitivity, the historic feature of Brockworth Court lies in the centre of the broad location and is identified as lying within the area of high landscape sensitivity.
- 2.104 The main visual receptors for this broad location are Coopers Hill from the south, Crickley Hill from the east and Churchdown Hill from the north west. The majority of the broad location is identified as having high visual sensitivity as it rises to the north adjacent to A417 and Valliant Way therefore making the north half of the broad location very visually prominent especially from the Cotswold Way which runs around along Coopers Hill (AONB) to the south.
- 2.105 Two parts of the broad location are identified as being of medium visual sensitivity, these include land to the east and west of Brockworth Court and land to the north of the junction of Ermin Street and Valiant Way. The overall

sensitivity rating is classified as medium. Key considerations incorporated into the Landscape & Visual Sensitivity plans;

- Strong green corridor running through site from east to west following Horsbere Brook which also wraps around historic features towards the centre.
- Land rises to the north adjacent to A417 and Valliant Way therefore making the north half of the site very visually prominent especially from Cotswold Way along Coopers Hill (AONB) to the south

What the urban design work has to say

2.106 Key considerations within the Brockworth Developable Area plan are;

- Retains and utilises existing field patterns to define the new development edge in order respect existing landscape features and characteristics. This is particularly relevant to the northern edge, where if development was permitted to extend up to the A417, it would significantly reinforce the landscape and visual impact of this feature, to the point where it becomes an overly dominant feature within the wider landscape setting.
- Creates a landscape buffer zone around Brockworth Court which is a key historic asset.
- Suggesting an extension of the existing movement network to facilitate appropriate and legible connections to create development that is more successfully integrated within the existing settlement patterns. Particularly where there is a clear opportunity to link adjacent areas through a shared high quality landscape asset.
- Maintaining important green routes/corridors/spaces which contribute to the potential for development to create an appropriately high quality “*sense of place*”.
- Spatially locates proposed employment areas adjacent or near to existing employment areas.

Consultation - what you told us

Green Belt

2.107 The loss of Green Belt land was of concern to some respondents. Their view

was that there should be no development between Cheltenham and Gloucester to preserve their characters. It was felt that the identity of the village, with its green open spaces, should be protected.

Open Countryside and Farm Land

- 2.108 It was felt that the use of open space enhanced the lives of local residents and should be protected for future generations. The open space provides an area of tranquillity and its loss would be a loss of heritage. It was raised that Brockworth needed its own land for open space and walks and that it would feel urbanised by roads enclosing it.

Infrastructure

- 2.109 Residents believe that the existing facilities would be unable to provide for future residents particularly as it was suggested that the proposed development represents a 50% increase in the population of Brockworth. There was concern that the lack of police stations in the area would lead to an increase in crime.

Flooding

- 2.110 Concern about future flooding levels was expressed particularly following the flooding that happened in this location in 2007.

Traffic Congestion

- 2.111 Additional housing would exacerbate existing traffic congestion particularly at peak times. Nettleton Bottom and the Air Balloon roundabout are already congested and suffer from numerous traffic accidents.

Alternative Sites/Approaches

- 2.112 Due to the close proximity of Stroud District Council's administrative area, this development was thought to be providing housing to meet the needs of Stroud. The phasing of the development of peripheral sites was criticised as it was felt to be overly restrictive.

Other

- 2.113 Two petitions relating to this land were received by Tewkesbury Borough Council in autumn 2012. An electronic petition and paper petition were

received by the Council on 27th September 2012 and 2nd October 2012 respectively in relation to land north of Brockworth in the Green Belt.

2.114 The paper petition requested that the Council vote against planning applications to release the land in question from the Green Belt for development. The paper petition is concerned with a future planning application and to debate the motion may have been unlawful. The Council is under a duty to determine each planning application upon its own merits and based upon the evidence presented to it.

2.115 The electronic petition relates to the plan making process and the protection of this land within the Green Belt. It had 252 signatures which are in excess of the 100 signatures required to trigger a debate at Council. The wording of the petition is set out below:

“We the undersigned petition the council to protect the Green Belt North of Brockworth along the A417. We would ask that TBC consider fulfilling the current housing need by building on all Brownfield sites and areas already set aside for building i.e. those already given planning permission. We ask that TBC show a commitment to the protection of this area of the Green Belt and recognise that this is the very last open space left to the residents of Brockworth following a sustained building programme over the last 5 years in the village. This has already contributed considerably to the housing requirement of Gloucester, Cheltenham and Tewkesbury. We also suggest that any councillors on the planning committee come out to Brockworth and view this area so as to make a more informed decision on the proposed release of Green Belt land for the developers. We the residents of Brockworth value this last open space in our community. We ask you to genuinely consider our request to keep it a public open space.”

2.116 The inclusion or otherwise of this land within the plan preparation would be through the JCS process as it represents a significant potential allocation. It is accepted that this land is currently within the Green Belt, although the most recent assessment considers that its contribution to Green Belt purposes is limited. It is recognised that Brockworth has had a significant level of building directed to it over recent years. Whilst open space within the community of

Brockworth may be limited, this is not the last open space accessible to residents of Brockworth given the proximity of the Cotswolds AONB and open countryside available. The objectively assessed need for housing is such that difficult choices have to be made within Tewkesbury Borough and land for residential use is required. This site is recommended as an urban extension to Gloucester to provide a contribution towards meeting that housing need.

Sites Assessment

- 2.117 Notwithstanding the fact that this Broad Location has high and medium landscape sensitivity it is considered that the area could make an effective contribution to development requirements to the east of Gloucester. The key to this broad location becoming a successful urban extension is the extent to which it integrates sensitively into its landscape setting, this can be achieved by careful urban design and appropriate landscape work.
- 2.118 There are areas of heritage and biodiversity interest within the broad location that merit protection with buffer zones and enhancement, along with the green infrastructure route of the Horsbere Brook that is of high landscape value which could be enhanced for public access and biodiversity purposes through any development proposals.
- 2.119 Two options have been considered for this area, which are broadly similar. It is considered that the landlocked parcel to the west of the broad location should come forward for a single land use as it is separate from any existing residential development and cannot easily be integrated into existing built form owing to severance by the three dual carriageways which surround the parcel. Pedestrian and cycle connectivity to services and facilities, including employment, shops and schools would require the crossing of a dual carriageway. It is considered that this would not encourage sustainable modes of travel such as cycling and walking by adults or children, moreover it would be extremely hazardous.

Option One

- 2.120 This option provides for employment uses in the parcel of land at the west of this Broad Location. The remainder of the broad location, with the exemption of biodiversity, green infrastructure and heritage assets, would be suitable for

residential development plus the additional infrastructure that would be required to support such an urban extension including open space, playing pitches, sustainable drainage, primary school, local centre and community facilities. The existing built form provides opportunities to provide linkages into the broad location for both highway and pedestrian and cycle connectivity.

- 2.121 The opportunity exists to provide additional sports pitches and open space for the benefit of the existing community as well as improvements to the Horsbere Brook which would provide a new green infrastructure and biodiversity asset. Opportunities also exist to provide improved connectivity to the footpath and cycle system to the north of the broad location as well as to the AONB to the east of the A46. There could be scope to provide a park and ride facility either within this Broad Location or within C6, south of Cheltenham.

Option Two

- 2.122 This second option is virtually identical to option one, save for the single land use parcel west of Valiant being designated for residential use. This provides for a higher level of residential development to be achieved at this location. It is also recognised that the business park at Brockworth has not yet been fully implemented and let and that there is still employment land which has yet to be released within the wider area.

Conclusions

- 2.123 The level of objectively assessed need for housing has led to the recommendation that strategic allocations maximise the potential for residential development, whilst promoting strategic employment sites or allocations elsewhere. The removal of employment in this location reflects advice from the Gloucestershire Local Enterprise Partnership that other strategic sites were preferable for economic development. Of the two options considered at this location, the option for a residential led scheme is considered to provide the most appropriate response.

G8: Land at Highnam

Introduction and context

- 2.124 G8 is located to the west of Gloucester, beyond the functional floodplain at Highnam. This Broad Location falls entirely within Tewkesbury Borough. Highnam is a settlement within the wider rural area, but is located within reasonably close proximity to Gloucester. It is not considered that this Broad Location has the potential for an urban extension to Gloucester, but has been considered further in response to the particular requests of Councillors to assess its potential for a new settlement. It should be noted that the option of a new settlement has been explored, the findings of which can be found in the Spatial Options background paper.
- 2.125 This land is not covered by Green Belt designation. The Green Belt Assessment (Amec 2011) does not identify this land within those areas to consider including within the Green Belt. It does assess the land to the immediate west of Gloucester, which it concludes has no clear case for inclusion within the Green Belt.
- 2.126 Developing at this Broad Location would have a significant impact on the existing settlement of Highnam and would substantially alter its existing role and character.
- 2.127 The Broad Location is bordered on three sides by land falling within flood zone 3b, but the area itself is elevated and lies within flood zone 1.

Landscape and visual impact

- 2.128 The landscape sensitivity of this Broad Location is predominantly medium. This applies to the north and north west of the Broad Location which is believed to have degraded landscape features owing to agricultural intensification and loss of tranquillity towards the A417. Highnam Court which is south of Highnam has a high sensitivity landscape due to its historical and community importance and its visual prominent features. East of Highnam Court the landscape sensitivity reduces to medium-low due to agricultural intensification which has degraded the landscape character and fragmentation by infrastructure.

2.129 This large Broad Location provides pockets of biodiversity interest, primarily at Lassington Wood and Highnam Court. The rest of the area is fairly intensively managed, large arable fields with poor hedgerow structure and a few plantation woodlands. The Leadon valley is particularly species poor, however given its flood plain environment, it has the potential to be a significant habitat. The area has good connectivity to useful habitat, especially along the Leadon and down to Minsterworth Ham. If it were not for Highnam Court and Lassington Wood, then this area could be developed without too great an impact upon biodiversity. Lassington Wood is already extensively used and is somewhat degraded as a result. The Leadon Valley and the proposals for re-instatement of the Herefordshire and Gloucestershire Canal provide potential for good green infrastructure at this location.

2.130 The overall sensitivity rating is classified as medium. Key considerations incorporated into the North Highnam Landscape & Visual Sensitivity plan are;

- Gloucestershire Way National Trail cuts through the site which is a key visual receptor. And another visual receptor is from the north of the site across the valley which gives clear views from a well-used public footpath running east to west.
- Highnam village is situated upon high ground and is very visible from the surrounding open countryside and river corridor therefore the potential for improving the existing views is substantial
- Arable and pasture land use on the surrounding slopes with low hedgerows and a few areas of higher quality landscape features worthy of retention

What the urban design work has to say

2.131 Key considerations within the North Highnam Developable Area plan;

- The loop road around the existing settlement is not well overlooked and has almost no active frontages that would help to animate the street scene. Wrapping new development around this road would provide opportunity to address these deficiencies.
- Highnam currently suffers with a lack of centre or focal area for the settlement. There are currently two areas which begin to suggest “village

centre” at the two threshold locations on the B415...but these two “places” are disconnected and subsequently give way to un-overlooked road...clearly not an appropriate “centre” to a village. New development should seek to redress this spatial imbalance by creating linking development that provides an appropriate level of facilities and spatial focal point, or village centre. In order to achieve this, the balance of new development would have to be at a level where provision of a village centre is practical.

Consultation - what you told us

- 2.132 Land at Highnam was not put forward as a potential strategic allocation in the JCS ‘Developing the Preferred Option’ document, and as such there is little direct reference to this area in the consultation responses. However the following is relevant in this location.

Settlement specific - Highnam

- 2.133 The proposed settlement hierarchy recognises Highnam as a third tier, larger settlement, however respondents did recognise that whilst Highnam does have a shop and a primary school it was felt that it cannot be compared to settlements such as Bishop’s Cleeve and Winchcombe which are considered to fall within the same tier. It was felt that Highnam should be recognised as a fourth tier, medium settlement as the services available are on a reduced level and primarily serve local residents.

Flooding

- 2.134 The exacerbation of flood risk as a result of new development is a major concern for significant numbers of respondents living in areas that have experienced flooding in recent years. The adequacy of surface water drainage and flood prevention and alleviation infrastructure is questioned by many respondents, and gaps in the evidence base are referred to. The vast majority of responses here were of a very general nature but stated that increased flood risk was a concern even with defences included and that developing land could either exacerbate the current situation or at best just displace the problem. People were therefore questioning that if the land is developed, where will the water go?

Open Countryside and Farm Land

- 2.135 There is a concern that agricultural land will become increasingly important for local food production.

Infrastructure

- 2.136 Some respondents acknowledge that the impact of new development on infrastructure needs to be carefully considered and the solutions properly planned, and that good quality infrastructure can aid economic prosperity. The re-use or improvement of existing infrastructure should be encouraged in the interests of sustainability.

Traffic Congestion and Air Pollution

- 2.137 Respondents felt that the existing road network would be unable to cope with increased levels of traffic. Concerns that air quality will deteriorate as a result of increased exhaust gas pollution in areas prone to traffic congestion are also raised. Other highways/transport -related issues include concerns about the impact of development on public footpaths and cycle paths and problems with public transport.

Sites Assessment

- 2.138 Two very different options have been considered at Highnam. The first wraps around the existing village, whilst the second option focuses on land to the south of Highnam Court.

Option One

- 2.139 This option effectively provides development to wrap around the existing built area of Highnam. Residential growth here could bolster and enhance the existing settlement of Highnam. Potential housing growth could 'wrap around' the north and east of the existing settlement to improve the public realm and provide an active, high-quality, street scene. Furthermore, an area of new development could be provided to the immediate west and south-west of Highnam, to include a new 'local centre/community hub' and additional primary school to serve the settlement.
- 2.140 Employment growth here in the form of a well-designed extension to the existing rural employment facility of Highnam Business Park, could

compliment and work in tandem with the proposed new residential development to provide local and sustainable employment opportunities.

- 2.141 An extensive framework of landscaped and green spaces would provide the setting for new neighbourhoods whilst preserving the setting of the key wildlife site of Lassington Wood and the Historic Park and Garden of Highnam Court.

Option Two

- 2.142 Residential growth here could potentially occur as a 'fourth phase' to the proposed, phased residential development to the north, east, west and south-west of Highnam settlement. As such, this broad location could be brought forward for development over the longer term, once the phased development, community infrastructure and highways improvements necessary for the delivery of Option One have been completed.
- 2.143 This option could provide a modest level of development to be accessed from the existing A48 highway. A higher level of residential development could maximise the development's sustainability potential by increasing the viability of new service/infrastructure/community facilities provision.
- 2.144 An extensive framework of green spaces/infrastructure could provide the setting for new neighbourhoods whilst providing a buffer for the development from the A40 highway. Furthermore, the provision of additional green infrastructure could preserve and enhance the high quality natural landscape of the nearby 'Pipers Grove' and 'Corseleas Brake', 'Mary Grove' Key Wildlife Sites, provide formal and informal public open space, biodiversity gain and potential sustainable drainage opportunities within the site.
- 2.145 Notwithstanding the above, Option Two is relatively isolated from the settlement of Highnam and separated by the A40 highway and lies remote from Highnam's services. Furthermore, this area is physically constrained by significant flood risk to the east and south-east, and also by sensitive nature areas to the centre.

Conclusions

- 2.146 Neither option is recommended to be taken forward given that neither fits with the JCS spatial strategy of urban extensions to Cheltenham and Gloucester. Development at Highnam cannot be considered as an urban extension to Gloucester. This is not to suggest that development at Highnam will not take place within the plan period, rather that it will be more appropriately considered through the Tewkesbury Borough Plan and will contribute towards the level of development envisaged for the Service Villages, of which Highnam is one.

3.0 Development at Cheltenham

Analysis of potential Strategic Allocations

- 3.1 Updated capacity assessment work has identified an approximate urban capacity for Cheltenham Borough of approximately 4,400 dwellings. Potential development land was identified all around the town, excluding the Cotswolds Area of Outstanding Natural Beauty. Six Broad Locations were previously identified on the periphery of Cheltenham and beyond to Bishop's Cleeve and the assessment of the potential for development at these general locations was set out within the Broad Locations report (October 2011). Some of these Broad Locations fall within the Green Belt.

Filtering exercise

- 3.2 From the original six broad locations, two have not been explored further through this work. C4 at Boddington is some distance from the built edge of Cheltenham and physically detached from the urban area, exacerbated by its position beyond the M5 motorway. Development proposed at this location could not be considered as an urban extension and therefore would not be in line with the strategy being taken forward within the JCS which promotes urban extensions to Cheltenham and Gloucester.
- 3.3 Broad Location C1 at Bishop's Cleeve was included as part of the earlier study work. It is not considered that Bishop's Cleeve forms part of the urban area of Cheltenham, but it is recognised that its proximity to Cheltenham meant that it should be explored. Following the publication of the Broad Locations report, two planning appeals for large scale residential development have been allowed at Bishop's Cleeve and as such this has not been considered further as an appropriate location for any further strategic development. Development proposed at this location could not be considered as an urban extension and therefore would not be in line with the JCS development strategy. Any additional non-strategic development at Bishop's Cleeve will be considered in the context of the Tewkesbury Borough Plan.
- 3.4 Four of the Broad Locations have been considered further and a map indicating the location of these potential Strategic Allocations is attached at Appendix Two of this report. Should additional land be required to help meet

the need for housing and employment development, then one of the options would be to explore cross boundary development through the duty to co-operate. Identified below is an assessment of the different development directions.

Identifying Locations for Strategic Sites

- 3.5 Cheltenham's potential for strategic development has been focussed to north, south and west of the town. The Cotswolds Area of Outstanding Natural Beauty lies to the east of the town and it is not considered an appropriate direction within which to explore the potential for strategic development due to its high landscape value and major contribution to the setting of the town.
- 3.6 The consideration of potential land for both housing and employment development is set out within Cheltenham's Strategic Housing and Employment Land Availability Assessments. These assessments have found a number of smaller sites within and adjacent to the existing built up area which could be developed within the plan period. Such sites may be considered and allocated through the Cheltenham Borough Plan.
- 3.7 The approach to the identification of strategic sites was developed using the sequential approach set out in the extant guidance to support PPS25 Flood Risk and informed by the production of a Strategic Flood Risk Assessment Level 1 and 2.

C2: Land to the north of Cheltenham

Introduction and context

- 3.8 Land at this location covers a significant area to the north of the town between Cheltenham and Bishop's Cleeve. It extends west towards the Wingmoor Farm facility at Bishop's Cleeve and is bounded by the mainline railway. To the east the Broad Location is bounded by the Cotswolds AONB. The Broad Location lies entirely within the Green Belt and was considered to provide a significant contribution to the purposes of including land within the Green Belt. In terms of flood risk, much of this Broad Location falls within flood zone 1, though a narrow channel associated with the brook falls within flood zone 3b.

- 3.9 The Broad Location report found that most of this search area was unsuitable for new development either because it would be: in open countryside, inaccessible and unrelated to other residential or commercial development, near existing 'bad neighbour' development or would very significantly impact either the Green Belt strategic gap between Bishops Cleeve and Cheltenham, the setting of the AONB, or areas of high visual sensitivity. It is within this wider area that a potential strategic allocation is sought.
- 3.10 The report concluded that there was some potential for developing land within this wider area, west of the A435, close to the urban edge of Cheltenham and below the sensitive ridgeline. However the topography of this area would be key in terms of integrating development into the landscape. Any consideration for further development at the racecourse would need to be balanced against the role the racecourse plays in fulfilling Green Belt policy and the numerous functions of the racecourse together with its contribution to the wider economy of Cheltenham and Gloucestershire. It is within this area that a potential strategic allocation is sought.

Landscape and visual impact

- 3.11 To the west of the racecourse the land slopes upwards to the north with a distinctive ridgeline preventing views across to Bishop's Cleeve. Within the Broad Location the landscape sensitivity varies. Within the far south-western corner of the broad location the landscape sensitivity is divided into medium sensitivity (Hyde Farm) and low sensitivity (Hunting Butts). Land to the west of the racecourse is predominantly arable with a large field structure and poor hedgerow structure. Many landscape features have been retained and the area has good local amenity resource.
- 3.12 The overall sensitivity rating of this area is low.
Key considerations incorporated into the North Cheltenham Landscape & Visual Sensitivity plans;
- Site dominated by race course and high topography to the north which screens/softens majority of views.

- Landscape character has been damaged and degraded towards the east however, some hedgerow trees and field patterns to the west are worthy of retention.
- Footpath running east to west is a key receptor together with more distant views from Cleeve Cloud, AONB.

What the urban design work has to say

3.13 Key considerations within the North Cheltenham Developable Area plan;

- Not building on existing entrance car parks to the race course as this would obscure clear views into and out of what is an iconic facility for Cheltenham, and would negatively affect the “sense of place” in this location.
- Restricting development to the lower areas of land to the north of the current settlement areas to maintain wider strategic landscape setting, and views back across the Cheltenham skyline from these areas.
- Maintaining green buffer between development and the race course.
- Introducing a “gap” in the new development to maintain the vista along Tommy Taylors Lane. This view positively contributes to a local sense of place.

Consultation - what you told us

3.14 This area was not put forward as a potential strategic allocation in the JCS ‘Developing the Preferred Option’ document, and as such there is little direct reference to this area in the consultation responses. However the following is relevant in this location.

Flooding

3.15 The exacerbation of flood risk as a result of new development is a major concern for significant numbers of respondents living in areas that have experienced flooding in recent years. The adequacy of surface water drainage and flood prevention and alleviation infrastructure is questioned by many respondents, and gaps in the evidence base are referred to. The vast majority responses here were of a very general nature but stated that increased flood risk was a concern even with defences included and that developing land could either exacerbate the current situation or at best just

displace the problem. People were therefore questioning that if the land is developed, where will the water go?

Open Countryside and Farm Land

- 3.16 There is a concern that agricultural land will become increasingly important for local food production.

Infrastructure

- 3.17 Some respondents acknowledge that the impact of new development on infrastructure needs to be carefully considered and the solutions properly planned, and that good quality infrastructure can aid economic prosperity. The re-use or improvement of existing infrastructure should be encouraged in the interests of sustainability.

Traffic Congestion and Air Pollution

- 3.18 Respondents are concerned about the adequacy of parts of the highway network, in the vicinity of Swindon Village, to cope with significant levels of development. Respondents felt that the existing road network would be unable to cope with increased levels of traffic. Concerns that air quality will deteriorate as a result of increased exhaust gas pollution in areas prone to traffic congestion are also raised. Other highways/transport -related issues include concerns about the impact of development on public footpaths and cycle paths and problems with public transport. Reinstatement of the Honeybourne line is cited as a key benefit which could be provided.

Alternative Sites/Approaches

- 3.19 Some people argue for extending the Green Belt, including the area to the North and East of Prestbury. In contrast, consideration should be given to releasing the land to the west of the A435 from the Green Belt.

Sites Assessment

- 3.20 The focus for a potential strategic allocation has been to the west of the A435 and towards the railway line below the ridgeline. Detailed landscape analysis was undertaken to provide evidence to a planning appeal in 2012, this assessment is at a much finer grain than the broad brush strategic assessment undertaken to inform the JCS. The more detailed analysis

considered that a higher level of sensitivity existed both in terms of views north and to the south. The separate assessments should be read alongside each other.

- 3.21 There has been some consideration of development potential to the east of the A435 towards Prestbury, though it is not considered that there is sufficient scope for a strategic allocation at this location. Instead smaller potential development sites have been identified, which could be taken forward within the Cheltenham Borough Plan. There may also be scope to extend the opportunities for business development associated with the racecourse.
- 3.22 The 2012 SHLAA identifies the developable area of C2 (as well as some land further north, above the ridge) as “OUA15 Swindon Village Land at Hunting Butts (whole)”. The report describes the site being adjacent to residential development, but outside of the urban area and within the Green Belt. The ridgeline on site is considered to be of significant importance.
- 3.23 An outline application for 135 dwellings proposed for the area north of Tommy Taylor’s Lane was refused and an appeal dismissed (Appeal Ref: APP/B1605/A/11/2164597). The main reason for the dismissal was the areas’ significance to the purposes of Green Belt. In landscape terms the inspector found that *“harm to the landform should carry no more than moderate weight against the development... In addition to the Green Belt harm I have found that there would also be harm to the character and appearance of the area. However, I consider that the degree of harm should not be overstated and should carry no more than moderate weight against the development.”* However the inspector found a strong case in regard to the value of retaining the site to maintain the purposes for which the Green Belt was designated.
- 3.24 However the inspector also remarked that “I accept that it is highly likely that development outside the settlement boundary of Cheltenham, probably in the Green Belt, will be necessary if Cheltenham’s housing and economic development needs are to be met. However, in this case I have found that despite the clear benefits of the scheme in meeting some of those housing needs the particular characteristics of the appeal site mean that the totality of

the harm would not be clearly outweighed by other considerations and the very special circumstances necessary to justify the development do not exist.”

- 3.25 This could be seen as a summing up that encroachment into the Green Belt will probably be necessary somewhere around Cheltenham for the JCS, but not in this location and with this scheme.
- 3.26 The key challenge for this area is to provide development which has the potential to integrate into the existing settlement pattern and provide a meaningful urban extension. Two options were drawn up for this potential strategic allocation and are attached within Appendix 5.

Option One

- 3.27 Option one considered a residential led strategic allocation to the north of Swindon Land extending from the railway line in the west to the safeguarded route of the Honeybourne Line in the west. It was considered that the potential to extend eastwards into the ‘Hunting Butts’ area would not provide a well-integrated scheme given the difference in topography levels and the strong boundary of the Honeybourne Line. There was a further, unlinked area to the east, adjacent to the A435, north of Swindon Lane, which was considered to have potential for racecourse related development. It is currently used as overflow parking on key race meetings.

Option Two

- 3.28 Option Two included the same potential development parcels, but also had additional residential development set out at ‘Hunting Butts’, and in pockets to the rear of New Barn Lane and to the rear of properties along both sides of Bowbridge Lane. Additional racecourse related development was identified to the south and south west of the racecourse within their wider perimeter.

Conclusions

- 3.29 The adjacent areas to the south of the search area are characterised by established residential uses. The potential exists to successfully integrate new development with the existing urban form. To the west of the A435, there is potential to create an urban extension as set out in Option One. The residential development parcels within Option Two to the east of the A435 do

not lend themselves to a coordinated development scheme. Individually they could be developed, should they be allocated within the Cheltenham Borough Plan, however for the purposes of identifying strategic development, Option One is preferable.

- 3.30 Notwithstanding the above, this part of the Broad Location makes a significant contribution towards Green Belt purposes as assessed in the AMEC report and scores 4/4 in terms of the matrix breakdown sitting behind the assessment. In accordance with the Green Belt methodology set out in section one of this report, this is not considered an appropriate location within which to allocate strategic development. In addition, the Green Belt boundary would need to be redrawn from an existing hard boundary to a soft boundary to accommodate such development. The topography of the area is such that a suitable revised Green Belt boundary cannot readily be achieved in this location. As a result it has not recommended to be taken forward as a strategic allocation in the Draft JCS.

C3: Land to the north west of Cheltenham

Introduction and context

- 3.31 This location includes land extending in a north westerly direction from the built edge of Cheltenham at Uckington and Swindon Village. The two water courses which converge towards Elmstone Hardwicke have associated land within the functional floodplain. Land in the southern part of this Broad Location, at Tewkesbury Road, lies within flood zone 2.
- 3.32 This Broad Location consists of a predominantly flat open landscape of largely medium – low landscape and visual sensitivity with large arable fields and a large landfill site to the north east.
- 3.33 The land lies wholly within the existing Green Belt. The Green Belt Review (Amec 2011) considers land in this location to have a varied contribution in terms of the purposes of including land with the Green Belt. Land immediately adjacent to the west of Swindon Village is considered to make a limited contribution to the Green Belt. Beyond this in a westerly direction, land makes

a contribution. Land within this broad location which makes a significant contribution to Green Belt purposes is that land to the north of Swindon Village, extending adjacent to the main line railway.

- 3.34 There is a need to consider the strategic residual waste facility to the north east of this broad location. Any development at this location would also need to ensure that the potential impacts of noise / smell are minimised.
- 3.35 Development at C3 has the greatest potential to accommodate a significant element of Cheltenham's development needs. In capacity terms this area could deliver a significant number of dwellings and employment land. Given the constraints to Cheltenham, this is the most appropriate location for strategic development to the town. Infrastructure contributions could be maximised at this location and the potential to facilitate an upgrade to Junction 10 of the M5 should be explored.

Landscape and visual impact

- 3.36 The overall sensitivity rating has been classified as high – medium. Key considerations incorporated into the Landscape & Visual Sensitivity plans;
- Considerable area of high landscape character with high visual sensitivity which broadly follows the Swilgate river corridor and a network of strong field and hedgerow patterns either side.
 - The key visual receptor is from Cleeve Common (AONB) to the east with the national trail and PROW's

What the urban design work has to say

- 3.37 Key considerations within the Northwest Cheltenham Developable Area plan;
- Rationally "*rounding off*" or "*infilling*" the wider urban settlement to generate a quantum of development that does not appear inappropriately incongruous in the context of the wider urban form of surrounding settlements and while also seeking to avoid areas of high landscape and visual quality.
 - Suggesting an extension of the existing movement network to facilitate appropriate and highly legible connections with Elmstone Hardwicke,

Swindon Village & Uckington, thereby seeking to facilitate development that can be more successfully integrated within the existing settlement pattern.

- Retaining and utilising existing field patterns and boundaries to define the new development edge. This seeks to facilitate an urban edge that could appear as a more naturally formed and organic boundary to the wider landscape setting as opposed to creating an incongruous and insensitive point of transition between the natural and built environments.
- Suggesting an internal movement network whose layout is informed by existing routes and landscape features to help reinforce and enhance the existing character of the site.
- Maintaining important green routes/corridors/spaces which contribute to the potential for development to create an appropriately high quality “*sense of place*”.

3.38 Considerations within the Northwest Cheltenham Developable Area Option 2 plan that are distinctly different from the Option 1 plan;

- Suggesting a further area of development to the north of Swindon village to explore the deliverability of additional capacity.
- Although this area could be well linked to other new development and is not located within an area of high landscape or visual sensitivity, this additional area would increase the perceived intrusion of new development into the wider landscape by not being as well spatially related to existing urban form.

Consultation - what you told us

Flooding

3.39 Concerns about flooding generally and the levels of flooding experienced in this area in July 2007 were raised. There are fears that flood prevention works are inadequate. The effect of building additional housing in this location could have implications for flooding elsewhere, particularly Tewkesbury, due to increased run off.

Open Countryside and Farm Land, Flora and Fauna

3.40 Many responses were raised on the loss of habitat, visual amenity, agricultural and allotment land in light of the need to use brown field sites first along with vacant sites and a reduction in the number of second homes in the

area. It was commented that the loss of productive land would mean that more food would need to be brought into the area and that this land could not be returned to food production once lost to housing.

Infrastructure

- 3.41 It was considered that additional housing numbers would increase the pressure on existing infrastructure, particularly schools, health care, shops, jobs, sports and leisure facilities, water supply and public transport. The recent drought in many parts of the country raised concerns about the ability to supply water to new residents. Sewage disposal from this site was also of concern. This site is considered to be the most logical area for a future business park, providing junction 10 is upgraded to a full interchange. Junction 10 of the M5 not being a full interchange was a concern in terms of exacerbating traffic congestion, whilst for others the introduction of a full interchange at junction 10, a bypass for west Cheltenham and/or improved access to the town centre made this location an acceptable one for future housing. Concerns were expressed that it has yet to be demonstrated that there would be no adverse highway implications for junction 10, which is not a full interchange.

Traffic Congestion and Air Pollution

- 3.42 Additional housing would exacerbate existing traffic congestion particularly at peak times. Increased congestion and a lack of parking have implications for businesses in the town centre and the ability of the town to attract new businesses. Increased traffic raised concerns about air quality and the safety of pedestrians. There would be an increased number of vehicles accessing St Mary Magdalene Church and create the need for on-site parking provision.

Green Belt Land

- 3.43 The loss of Green Belt land was of concern and fears were expressed that Swindon Village would become part of suburban Cheltenham and thus lose its rural identity. It is argued that suitable and appropriate sites outside the Green Belt should be developed first, for example land to the north of Bishops Cleeve and land to the rear of Invista, Brockworth. The development of this green field site could compromise the development of brown field sites in the town and undermine the Council's Civic Pride initiative.

Proximity to Wingmoor Farm

- 3.44 Concerns about air quality, land contamination and the health of future residents due to the proximity of a large waste facility at Wingmoor Farm near Bishops Cleeve were raised.

Urban/Suburban Growth

- 3.45 The additional housing is considered to be 'urban/suburban sprawl' whereby the Cheltenham urban area has encroached into open countryside. Any new housing should be separated from the industrial area. The development of this site would undermine the identity of the settlements and villages that will be surrounded by it.

Housing Occupancy

- 3.46 General concerns about where all the new residents would come from were expressed along with fears that the new houses would remain empty once completed.

Sites Assessment

- 3.47 The key challenge for this area is to provide development which has the potential to integrate into and complement the existing settlement pattern, recognising the existing settlements within the wider Broad Location. Two options were drawn up for this potential strategic allocation and are attached within Appendix 5.

Option One

- 3.48 Option one considered a heavily mixed use development scheme at this location. The option 1 mapping for this area shows a significant green buffer between development at Uckington and the new urban extension. This would serve to enhance the approach to both the town and the new development, with possible reinstatement of former orchards along the A4019. By integrating employment with housing across both major parts of the development this would reduce commuting times and increase sustainable transport, allowing more flexibility in the range of schemes which could be compatible with the allocation. This is a greener and more garden city focussed approach which, because of the extensive green buffering and central green infrastructure could lend to the new development at strong

sense of unique identity and place. This option also reduces residential vulnerability to flood risk and avoids areas of medium and high landscape and visual sensitivity.

- 3.49 This development option seeks release of land out towards the west and the M5, and in doing so it avoids urban sprawl towards Bishop's Cleeve and therefore retains the separation distance which is key to this area of Green Belt. However it may not be possible to develop this large an area within the plan period, and so ensuring that the first new residents within the community have a high standard of living in the meantime while construction is on-going or new phases are yet to be begun may be challenging.
- 3.50 Because the amount of Green Space indicated in the development is so large, particularly around the Hyde Brook area there is a danger that the new development areas may seem disjointed and unconnected with each other.

Option Two

- 3.51 The option 2 mapping for this area shows a comprehensive development north and south of the Hyde brook. It identifies potential for employment development adjacent to the existing trading estate and integrating well into the existing urban design layout of this part of the town. This option shows a smaller green corridor safeguarding flood risk from the Hyde brook (still outside flood zone 3 and 2b) which allows for linkage between the two main elements of the development. A mixed use local centre and community hub is located at one of these key crossing points, centrally to both elements of the new development.
- 3.52 Option 2 shows residential development in some areas of high landscape and visual sensitivity (in the north of the development) but these are minimised to just those areas which are essential for the interconnectedness and comprehensive development of the layout. Option 2 would require careful planning of green infrastructure and flood risk around the Hyde brook and effective buffering of the landfill to the north from new residences, but is the preferred solution at this time.

- 3.53 Option 2 also shows an area of development restraint, which would be safeguarded for future development in the next plan period, to ensure a structured and effective larger urban extension to meet future need. It would effectively remove this area from the Green Belt but protect it from inappropriate development.

Conclusions

- 3.54 As Option One would not provide as many units as Option 2, and does not use the location comprehensively, or identify where development beyond the plan period would take place, this option is not preferred.
- 3.55 All of the studies consider North West Cheltenham to be one of the most sustainable locations for new residential and employment development in the JCS area. Whilst the area is within the Green Belt, it scores low on measures to evaluate the value of land to the purposes of Green Belt compared with other potential urban extension sites.
- 3.56 The main constraints on the site are some degree of flood risk in around 30% of the total area and the land fill site adjacent to the north east boundary of the C3 study area. There is also the issue of where to draw a defensible Green Belt boundary on the site to allow for managed future growth as the site is likely to be larger than can be built out within the plan period. Water infrastructure may be an issue on the site and we will need to get advice from Severn Trent on this matter.
- 3.57 The main issue for this site is how the developable area footprint of the site should be allocated; what will give the best compromise between maximising developable area to accommodate need, whilst reducing flood risk and minimising nuisance from the Waste Site and maintaining separation between Cheltenham and Bishop's Cleeve. There is also a question as to where employment provision should go, whether this is best dealt with through a mixed use allocation or specific allocations for employment and housing respectively and how much green space should surround the development.

C5: Land to the west of Cheltenham

Introduction and context

- 3.58 Land to the west of Cheltenham is relatively flat land drained by the River Chelt. Broad Location C5 lies adjacent to the urban edge of Cheltenham and has an urban fringe character. The landscape character of this site is typical of the settle unwooded character of the Vale of Gloucester. It has a regular patchwork of arable and pasture fields enclosed largely by neat hawthorn hedges. There are no woodlands or copses within this area but the hedgerow trees give the local impression that this is a well treed landscape. Land in the northern extent of this Broad Location falls within flood zones 3b and also 2 this is due to the river Chelt, but elsewhere, the broad developable area is within flood zone 1.
- 3.59 This Broad location lies wholly within the Green Belt. The Green Belt review (Amec, 2011) considers all the land within the Green Belt to the west of Cheltenham as making a significant contribution to Green Belt purposes.
- 3.60 Broad Location C5 contains a major waste water treatment facility around which there is currently a development exclusion zone. This site handles most of Cheltenham's waste and has recently been upgraded, it is likely to play an essential ongoing role. The Sewage Treatment Works emits odour which has the potential to seriously affect any developments that occur nearby.

Landscape and visual impact

- 3.61 The overall sensitivity rating is classified as medium – low (with some patches of high)
- Key considerations incorporated into the West Cheltenham Landscape & Visual Sensitivity plans;
- Predominate land use is pastoral with recognisable field pattern to north and remnants of strong hedgerows with veteran trees as landscape features near centre of site
 - Residential gardens, transport routes and car dealers yards influence the landscape character to the south

- A number of PROW's through and adjacent to the site provide key visual receptors as the neighbouring residential housing is well screened.

What the urban design work has to say

- 3.62 Key considerations within the West Cheltenham Developable Area plan;
- Provides notional "Cordon Sanitaire" around the water treatment works.
 - Maintains area of open aspect across existing landscape where deemed of value – this will positively contribute to quality of place.

Consultation - what you told us

- 3.63 West Cheltenham was not put forward as a potential strategic allocation in the JCS 'Developing the Preferred Option' document, and as such there is little direct reference to this area in the consultation responses. However the following is relevant in this location.

Flooding

- 3.64 The exacerbation of flood risk as a result of new development is a major concern for significant numbers of respondents living in areas that have experienced flooding in recent years. The adequacy of surface water drainage and flood prevention and alleviation infrastructure is questioned by many respondents, and gaps in the evidence base are referred to. The vast majority responses here were of a very general nature but stated that increased flood risk was a concern even with defences included and that developing land could either exacerbate the current situation or at best just displace the problem. People were therefore questioning that if the land is developed, where will the water go?

Open Countryside and Farm Land

- 3.65 There is a concern that agricultural land will become increasingly important for local food production.

Infrastructure

- 3.66 Some respondents acknowledge that the impact of new development on infrastructure needs to be carefully considered and the solutions properly planned, and that good quality infrastructure can aid economic prosperity.

The re-use or improvement of existing infrastructure should be encouraged in the interests of sustainability.

Traffic Congestion and Air Pollution

- 3.67 Respondents felt that the existing road network would be unable to cope with increased levels of traffic. Concerns that air quality will deteriorate as a result of increased exhaust gas pollution in areas prone to traffic congestion are also raised. Other highways/transport -related issues include concerns about the impact of development on public footpaths and cycle paths and problems with public transport.

Alternative Sites/Approaches

- 3.68 Some respondents put forward land at Hayden Green as an alternative/additional site for development and considered it should be released from the Green Belt as it would provide an appropriate direction for Cheltenham to grow.

Sites Assessment

- 3.69 The redevelopment of this site will be inextricably linked to the extent to which the area to which the cordon sanitaire relates. This has also restricted the land uses considered within this potential strategic allocation. Cheltenham Borough Council's environmental health team have cautioned against residential build in this location on the grounds of smell. It would be difficult to achieve high quality of life for residents dwelling on the site with the sewage facility in place.
- 3.70 Only one option has been considered for this strategic allocation. The development of this land could provide a strategic employment allocation to the west of Cheltenham. This could be relatively well integrated into existing development at Hope Orchard and Spring Bank and which is accessible from Old Gloucester Road.
- 3.71 It is of a reasonable size given the potential difficulty in attracting investment given the location and need to mitigate smell. This location provides an employment site of strategic size, but does not pull in disjointed parcels of

development further south which may be more appropriately considered through the Cheltenham Borough Plan.

- 3.72 The existing Green Belt boundary at this location is delineated by the hard boundary which Fiddlers Green Lane provides. The creation of a strategic allocation at this location could weaken this boundary and would require the creation of a new defensible boundary line with reference to existing features. In the Option put forward, the local authority administrative boundary and field boundary (which fall into a similar line at the north of the site) provide a new boundary.
- 3.73 This potential site is significantly constrained by the safeguarded sewage treatment plant at Hayden which creates considerable smell problems for future development. The plant is the only such facility for Cheltenham and there is no evidence from Severn Trent that they have considered or have costed the removal or relocation of the plant, which has been upgraded as recently as 2004 and also undertakes Anaerobic Digestion processes.
- 3.74 A strategic allocation at this location would need to take into account the Gloucestershire County Council's Waste Core Strategy Policy WCS11 which safeguards the site from development which would hinder it or its expansion (WCS7) and states that "Proposals that would adversely affect, or be adversely affected by, waste management uses will not be permitted".

Conclusions

- 3.75 The option for this Broad Location could provide a strategic allocation, which could be delivered early in the plan period and contribute to the sustainability of Cheltenham and provide easy commuting opportunities for the strategic allocation recommended at North West Cheltenham.
- 3.76 The constraints which the Cordon Sanitaire presents at this location make it difficult to establish an appropriate strategic allocation. However it is considered that there may be the potential to provide development at this location, pending the conclusions of further work by Severn Trent in relation to the odour nuisance. It is recognised that the twenty year plan period within

which the JCS is founded, could hamper any future relocation of the sewage facility.

- 3.77 With the above in mind, it is further considered that an area is released from the Green Belt in this location, but safeguarded for longer term development needs. A large area of the safeguarded land would also be designated as a Development Exclusion Zone, where any development which would be likely to be significantly affected by odours would not be permitted.

C6a: Land to the south of Cheltenham

Introduction and context

- 3.78 Land to the south of Cheltenham falls within Broad Location C6. This land forms part of the countryside which separates Cheltenham and Gloucester. It incorporates the village of Badgeworth. The area extends from the built form area of Cheltenham in the north to the A417 in the south. The eastern boundary largely follows the Shurdington Road and the Cotswolds AONB boundary. To the west, the boundary is marked by the M5 motorway. The land at the east is adjacent to the Cotswolds AONB and there are other designations which affect this Broad Location.
- 3.79 The Broad Locations report considered that there was potential for development towards the north of this area, including the undesignated land at Leckhampton, and adjacent area part of which falls within Tewkesbury Borough. This wider area has been considered further and two potential areas within which to consider strategic allocations have been identified. For assessment purposes, these have been separated within this report. C6a relates to the area at Leckhampton and C6b relates to the area at Chargrove south of Up Hatherley Way.
- 3.80 There are small areas within this Broad Location which fall within Flood Zone 2, an example being within the land at Leckhampton within Cheltenham Borough. Moorend Stream runs adjacent to the eastern boundary of the site whilst Hatherley Brook runs adjacent to the eastern edge of the

Gloucestershire County Council land and through the centre of the site. There are other smaller ditches in locations across the site.

- 3.81 The JCS Green Belt Assessment considered that the potential for extending or making additions to the Green Belt was a limited one, with the land immediately to the South of Cheltenham having the strongest case on the basis that it effectively forms part of a larger area which is considered to make a significant contribution to Green Belt purposes. However this view contrasts with that of the 2007 AERC Cheltenham Green Belt Review⁴ which found that the area did not produce scores in the high category against the defined Green Belt purposes and therefore did not recommend that inclusion in the Green Belt was justified.
- 3.82 The Inspector who held the Inquiry into objections to the Cheltenham Local Plan (Local Plan Local Public Inquiry (November 2004))⁵ declined to recommend that the Leckhampton area be given Green Belt status. Similarly the RSS Panel who considered this issue in 2007/8 came to the view that the area should not be included within the Green Belt and had scope for sustainable development.⁶
- 3.83 The land at Leckhampton lies approximately 3.5 km from the town centre, which is closer than most other undeveloped land around the edge of the settlement, and is largely bordered by existing housing development on a number of sides. Given the current demand for housing, and the need to release land from the Green Belt in other parts of the JCS area to meet Objectively Assessed Need; the allocation of the Leckhampton area for residential development contributes toward the NPPF aim of 'promoting sustainable patterns of development'.

⁴ www.cheltenham.gov.uk/download/downloads/id/3074/green_belt_review_report

⁵ http://www.cheltenham.gov.uk/downloads/file/3264/inspector_s_report

⁶ http://www.southwest-ra.gov.uk/media/SWRA/RSS%20Documents/EiP%20Panels%20Report/SW_RSS_EiP_Report_-_in_full.pdf

Landscape and visual impact

3.84 The overall sensitivity rating is classified as high – medium.

Key considerations;

- Very prominent landform and field pattern to the south adjacent to the AONB which is vulnerable to change and is considered valuable landscape resource.
- Only a small area has limited intrinsic landscape value as previous character has already been lost.
- Primary key views from national trail/PROW's within the AONB to the south of the area from Hartley Hill and Shurdington Hill.

What the urban design work has to say

3.85 Key considerations within the South Cheltenham Developable Area

- Rationally “*infilling*” the wider urban settlement to generate a quantum of development that does not appear inappropriately incongruous in the context of the urban form of surrounding settlements and while also seeking to avoid areas of high landscape and visual quality.
- Suggesting an extension of the existing movement network to facilitate appropriate and legible connections to create development that is more successfully integrated within the existing settlement patterns. Particularly to the northwest edge of the site where there is a clear opportunity to link adjacent areas through a shared high quality landscape asset.
- Retaining and utilising existing field patterns and boundaries to define the new development edge. This seeks to facilitate an urban edge that would appear as a more naturally formed and organic boundary to the wider landscape setting
- Suggesting an internal movement network whose layout is informed by existing routes and landscape features to help reinforce and enhance the existing character of the site.
- Maintaining important green routes/corridors/spaces which contribute to the potential for development to create an appropriately high quality “*sense of place*”.

3.86 It was further considered that there were additional opportunities relating to this area of:

- Suggesting a further area of development to the southeast of Farm Lane to reflect the current allocation of this site for residential development.
- Although this area could be well integrated into surrounding new development, this additional area would increase the visual intrusion of new development into the wider landscape from the key visual receptor points.
- The additional area would be within areas of high landscape & visual sensitivity.

Consultation - what you told us

Flooding

- 3.87 Concerns about flooding generally and the levels of flooding experienced in this area in July 2007 were raised, with several examples cited. New houses would be subject to flooding and the increase in runoff would have implications for existing houses elsewhere.

Open countryside, Farm Land, Flora and Fauna

- 3.88 Many responses were received on this issue covering a very wide range of strongly-voiced concerns from loss of amenities, leisure facilities and heritage to loss of wildlife habitats and green space to loss of agricultural land and allotments. It was considered that there was a need to use brown field sites first along with vacant sites and a reduction in the number of second homes in the area.

Infrastructure

- 3.89 Additional housing numbers would increase the pressure on existing infrastructure, particularly schools, health care, shops, jobs, sports and leisure facilities, water supply and public transport. The ability of local secondary schools (Bourneside and Balcarras) to accommodate additional pupils was questioned; similarly local primary schools (Naunton Park, Leckhampton and St James) were considered to be at capacity in terms of pupil numbers. Sewage disposal from this site was also of concern.

Traffic Congestion and Air Pollution

- 3.90 Respondents feared that additional housing could exacerbate existing traffic congestion particularly at peak times. Increased traffic raised concerns about air quality and the safety of pedestrians and cyclists, particularly at Shurdington Road and Leckhampton Lane by the Bell public House. The additional housing being built at the M & G site would add to the existing congestion. The A46 is used as an alternative route if there is a problem on the M5.

Alternative Uses/Approaches

- 3.91 Development of this strategic allocation attracted some support; assessment of the effect on the A417 should be considered particularly Nettleton Bottom to the Air Balloon roundabout. There was also support for a maximum of 100 to 200 houses in this location. There was also support for 350 houses provided this was looked into very carefully in terms of the impact on roads and the availability of school places.

Setting of the AONB

- 3.92 It was expressed that the additional housing would be considered urban/suburban sprawl whereby the Cheltenham urban area has encroached into open countryside. The land is adjacent to the Cotswolds AONB and should be protected as the setting for this nationally recognised area.

Green Belt

- 3.93 It was felt that the allocation of land in this location would be contrary to the recommendations in the AMEC Green Belt report and it was requested that the site be designated as Green Belt.

Previous Appeal Decisions

- 3.94 Previous appeal decisions have been quoted by many respondents, particularly the perception of traffic problems being given as a reason for turning down the appeals. Some respondents argue that nothing has changed since four Inspectors turned down previous proposals to develop here. The JCS evidence base has not produced anything to alter their views

Location and Future Implications

- 3.95 Concerns about the density of housing on future sites were expressed along with questions about the derivation of figures for future housing need.

Other

- 3.96 A petition was submitted to both Cheltenham and Tewkesbury Borough Councils in December 2010 which asked for the Councils to consider the designation of land in Leckhampton with a view to protecting it from large scale development. Both Councils resolved to consider the petition in developing strategic options for the JCS. Analysis of the JCS evidence base provides this consideration.
- 3.97 Cheltenham is constrained by both the policy designation of Green Belt and the landscape designation of the Cotswolds Area of Outstanding Natural Beauty. The AONB has not been considered as an appropriate location within which to provide strategic development in the form of an urban extension. The Green Belt is being reviewed through the plan preparation, which is the appropriate vehicle through which to do so according to national guidance. The land at Leckhampton is not covered by either the Green Belt designation or the AONB. It offers an unconstrained opportunity for Cheltenham to meet its development needs, albeit part of this area falls within Tewkesbury Borough.
- 3.98 There are no sound planning reasons as to why this land cannot be developed. It is considered that Cheltenham cannot meet its objectively assessed needs within its administrative area, which is why Tewkesbury Borough is helping to meet some of these unmet needs. This unconstrained location offers a genuine opportunity for an urban extension which can be integrated with existing residential development.
- 3.99 In addition to the petition, two requests have been received to allocate the undesignated land at South Cheltenham as local green space, either through the Joint Core Strategy, or in an a future Neighbourhood Plan. (No application to begin the formal neighbourhood planning process has yet been received covering land in this area). These requests have been received by Cheltenham Borough Council and will be formally included within the public

consultation on the draft JCS and considered in the preparation of the JCS Pre-Submission. Two applications to designate Village Greens in the area have also recently been made, but are yet to be determined.

Sites Assessments

3.100 Four options were drawn up for this potential strategic allocation and are attached within Appendix 5.

Option One

3.101 Option one considered a mixed use development scheme at this location solely on the undesignated land within Cheltenham Borough. The Green Belt boundary could be redrawn to include land at Farm Lane within the designation and effectively remove the existing Tewkesbury Borough Local Plan housing allocation at this location.

3.102 The development pattern avoids areas of high visual and landscape sensitivity to the south of Leckhampton and would avoid development at Brizen Farm. However, this option would yield the lowest residential quantum for the site. It would also fail to represent comprehensive development of a wider strategic area.

Option Two

3.103 This option is as Option One, but also includes the existing Tewkesbury Borough Plan housing allocation. It retains the existing Green Belt boundary, and is a logical progression from both the CBC Local Plan's undesignated land at Leckhampton and the TBC allocation of land at Farm Lane.

3.104 The scheme would provide an increase in the residential development and offer a greater contribution to meeting the OAN. There would also be the potential to build on existing veteran / older trees to create one larger and one smaller community orchards; and also facilitate the creation of a green corridor on the path of Hatherley Brook.

Option Three

3.105 This third option has the same layout as option 2, but includes an additional area of development adjacent to Brizen Farm. This would offer a

comprehensive development option for the site and join up the developments on the west side of Farm Lane. It would also differentiate the allocation from previous suggested site layouts and ensure that future development did not continue west of Brizen Farm by creating a Country Park. Whilst the Country Park would not be in the precise location envisaged by those promoting it, it would build on the principles of creating access to the wider open countryside.

- 3.106 This third option does encroach into the Green Belt and would necessitate a change to the Green Belt boundary at this location.

Option Four

- 3.107 This option proposes the same layout as Option Two, but removes the employment element which is located fronting onto the A46 Shurdington Road and so offers the potential to increase the overall housing numbers within the strategic allocation. The removal of employment in this location reflects advice from the Gloucestershire Local Enterprise Partnership that other strategic sites were preferable for economic development.

Conclusions

- 3.108 Option One provides the lowest level of residential development and would remove the allocation from the land at Farm Lane. Given Cheltenham's identified need for housing, this option is not recommended. Option Two offers the opportunity for a mixed use development without encroaching into the Green Belt.
- 3.109 Option Three which proposes additional development at Brizen Farm is likely to impact on the setting of the listed Brizen Farm building, and means the allocation of land in high sensitivity Green Belt. It also creates additional complications surrounding the establishment of a country park and could harm the openness of this area through opening it up to visitors, parking and supporting infrastructure. The creation of such a park in this location could also have the effect of weakening the Green Belt gap between Cheltenham and Shurdington.

- 3.110 Option Four which mirrors the developable area of Option Two, but removes the strategic employment element, is considered to be the most favourable option for the site. It provides the highest level of residential development without the need to change the Green Belt boundary at this location.

C6b: Land to the south of Cheltenham at Chargrove

Introduction and context

- 3.111 This search area also falls within the wider C6 Broad Location, but is referred to separately as C6b and lies to the south of Up Hatherley Way and the existing built form of Cheltenham. It is considered that there is potential within this Broad Location to explore other opportunities for strategic development recognising the development needs arising at Cheltenham.
- 3.112 The landform of C6b is influenced directly by the neighbouring urban fringe of Cheltenham to the north east and by the open views of the escarpment of the protected Cotswold Area of Outstanding Natural Beauty to the south east.
- 3.113 The site is predominantly greenfield, with a few scattered rural properties within the development boundary. Chargrove Lane bisects the site from north to south, with the largest potential for development is in the east of the site. C6b has a patchwork of pastoral fields enclosed by well-maintained hedgerows defining its character. The site is generally flat with an irregular field pattern with limited tree cover. A traditional orchard to the west is a particular good landscape feature worthy of retaining.
- 3.114 The site is wholly within the Green Belt. The Green Belt Assessment considers that land in this location makes a significant contribution towards the purposes of including land within the Green Belt.

Landscape and visual impact

- 3.115 The overall sensitivity rating has been classified as medium. Key considerations incorporated into the South Cheltenham Landscape & Visual Sensitivity plans are;

- Hedgerow and field pattern, an orchard and some hedgerow trees worthy of conservation as landscape features
- Primary key view is from the adjoining AONB, Hartley Hill and the Cotswold Way – this highlights the hard existing urban edge

What the urban design work has to say

3.116 Key considerations within the South Cheltenham Developable Area;

- Utilises existing field patterns to define edge of development to reflect existing landscape features and character as opposed to generating a more imposed and unnatural boundary line. This will help to mitigate the visual impact of the linear urban edge along Up Hatherley Way as a feature within the wider landscape setting.
- Suggesting an internal movement network whose layout is informed by existing routes and landscape features to help reinforce and enhance the existing character of the site.
- Maintaining important green routes/corridors/spaces which contribute to the potential for development to create an appropriately high quality “*sense of place*”.

Consultation - what you told us

3.117 Development to the south of Cheltenham at Chargrove was not was not put forward as a potential strategic allocation in the JCS ‘Developing the Preferred Option’ document, and as such there is little direct reference to this area in the consultation responses. However the following is relevant in this location.

Flooding

3.118 The exacerbation of flood risk as a result of new development is a major concern for significant numbers of respondents living in areas that have experienced flooding in recent years. The adequacy of surface water drainage and flood prevention and alleviation infrastructure is questioned by many respondents, and gaps in the evidence base are referred to. The vast majority responses here were of a very general nature but stated that increased flood risk was a concern even with defences included and that developing land could either exacerbate the current situation or at best just

displace the problem. People were therefore questioning that if the land is developed, where will the water go?

Open Countryside and Farm Land

- 3.119 There is a concern that agricultural land will become increasingly important for local food production.

Infrastructure

- 3.120 Some respondents acknowledge that the impact of new development on infrastructure needs to be carefully considered and the solutions properly planned, and that good quality infrastructure can aid economic prosperity. The re-use or improvement of existing infrastructure should be encouraged in the interests of sustainability.

Traffic Congestion and Air Pollution

- 3.121 Respondents felt that the existing road network would be unable to cope with increased levels of traffic. Concerns that air quality will deteriorate as a result of increased exhaust gas pollution in areas prone to traffic congestion are also raised. Other highways/transport -related issues include concerns about the impact of development on public footpaths and cycle paths and problems with public transport.

Sites Assessment

- 3.122 The main constraint on the site is its Green Belt sensitivity and the difficulty in establishing a new Green Belt boundary if development is approved beyond the current urban area which is well defined by the up Hatherley Way road. The landscape is of medium sensitivity, but there are areas of high visual sensitivity.
- 3.123 There is a development option which could be pursued in regard to C6b which would limit the harm to the purposes of Green Belt by creating a new hard defensible boundary. This would mean expanding on existing residential development between Up Hatherley Way and Chargrove Lane, with Chargrove Lane becoming the new Green Belt Boundary in this area.

3.124 Although there is some high visual sensitivity in the most southern part of this site, the need to retain this area as undeveloped is outweighed by the requirement to develop to meet need, the necessity to develop a site comprehensively and need to be consistent with other nearby sites which have been released for development with medium landscape sensitivity and high visual sensitivity. This is particularly the case where the site can integrate well to an existing community and where there is already residential development near the area of sensitivity.

3.125 The key challenge for this area is to provide development which has the potential to integrate into the existing settlement pattern. Two options were drawn up for this potential strategic allocation and are attached within Appendix 5.

Option One

3.126 Option one considered a mixed use development scheme at this location with at least an equal split between housing and employment, increasing to 80/20 split of residential/employment land uses.

Option Two

3.127 Option Two considered a purely residential development scheme. Housing development here could complement the existing established land uses to the north and maximise the opportunities presented by the nearby community facilities.

Conclusions

3.128 Consideration has been given to linking the development at C6a and C6b, however this is not a pragmatic approach, partly because development proposals at C6a are quite well progressed, and therefore are likely to come before C6b; but also because further development linking the two urban extensions may harm place shaping for each development and give the appearance of urban sprawl. It is also important to retain green space between the two wherever possible.

3.129 The site is substantially enclosed by residential development and therefore residential uses are likely to be the most appropriate use in this location and

have a greater opportunity to integrate and connect with the established built form will be the predominant permitted use.

3.130 Whilst a strategic allocation at this location will result in a change to the existing Green Belt boundary, a new defensible boundary can be created along Chargrove Lane. As with all of the strategic allocations there will need to be green infrastructure/buffering associated with the site and required through detailed masterplanning work.

3.131 Option Two provides the highest level of residential development and balanced against the need for housing in Cheltenham is considered to be the optimum solution for this area and is recommended for inclusion as a further strategic allocation.

4.0 Tewkesbury Broad Locations

Analysis of potential Strategic Allocations

- 4.1 Updated capacity assessment work has identified an approximate residential capacity for Tewkesbury Borough of approximately 6,600 dwellings. This includes both rural and urban areas.
- 4.2 Potential development land at and around Tewkesbury/Ashchurch was identified having regard to the functional floodplain which heavily constrains Tewkesbury town. Six Broad Locations were previously identified on the periphery of Tewkesbury/Ashchurch and the assessment of the potential for development at these general locations was set out within the Broad Locations report (October 2011). None of the Broad Locations at Tewkesbury fall within the Green Belt or are referred to within the Green Belt review.
- 4.3 Development proposed at Tewkesbury would not be in the form of an urban extension as this is not in line with the strategy being taken forward within the JCS which promotes urban extensions to Cheltenham and Gloucester only. Tewkesbury Town is a market town within the JCS area and any strategic development at Tewkesbury would be in the form of a strategic allocation.

Filtering exercise

- 4.4 From the original six Broad Locations, four have not been explored further through this work. T1 and part of T6 fall largely outside the administrative areas for the three authorities and at this stage the potential for further development outside the JCS area has not been explored. T6 was also constrained by flooding and was found within the JCS 'Landscape Characterisation Assessment and Sensitivity Analysis' to have very high landscape quality.
- 4.5 Should additional land be required to help meet the need for housing and employment development for Tewkesbury Borough, then one of the options would be to explore cross boundary development through the duty to co-operate.

- 4.6 Broad Location T4 is heavily constrained by flooding and no strategic pattern of development could be achieved within this location. As such it has not been explored further through this work. Broad Location T5 lies within the existing historic battlefield designation set out by English Heritage and has not been considered further in this work. The designation of historic battlefield to the south of Tewkesbury is not considered a suitable location for development.
- 4.7 Two of the Broad Locations have been considered further and a map indicating the location of these potential Strategic Allocations is attached at Appendix Two of this report. Identified below is an assessment of the different development directions.

Identifying Locations for Strategic Sites

- 4.8 Tewkesbury's location at the convergence of the Rivers Severn and Avon and associated flood plain limit where growth to this market town can take place. Tewkesbury town's potential for development is focussed to the east of the town at Ashchurch. The consideration of potential land for both housing and employment development is set out within Tewkesbury's Strategic Housing and Employment Land Availability Assessments. These assessments have found a number of smaller sites within and adjacent to the existing built up area which could be developed within the plan period. Such sites may be considered and allocated through the Tewkesbury Borough Plan.
- 4.9 The approach to the identification of strategic sites was developed using the sequential approach set out in the extant guidance to support PPS25 Flood Risk and informed by the production of a Strategic Flood Risk Assessment Level 1 and 2.

T2: MoD site & land at Ashchurch

Introduction and context

- 4.10 Land at this location covers a large area which extends from the A46 northwards to the Carrant Brook at the administrative boundary of Tewkesbury Borough. The mainline railway provides the western boundary for much of this search area which includes the DSDC site at Ashchurch and

greenfield land to the north and which wraps around the north of the developed area of Northway. It is within this wider area that a strategic allocation is considered.

- 4.11 Whilst the site lies entirely within Flood Zone 1, the Carrant Brook flows in an easterly direction immediately north of the site and the Tirlle Brook flows to the south. There is a culverted watercourse, a tributary of the Tirlle Brook which flows under the existing built form towards the A46. In terms of surface water flooding, there are scattered areas of both intermediate and less risk across the Broad Location. There is biodiversity interest, particularly in the northern extent of the site and along the railway line. The key issue within this location is that of contamination and the ability to provide remediation which enables the future redevelopment of the area.

Landscape and visual impact

- 4.12 This Broad Location is dominated by St Barbara Barracks and the MOD depot, which comprises significant hard standing with very little vegetation. There is limited tree cover and generally very little potential for biodiversity at this location. The agricultural land to the west of the railway and south of the lane is generally arable with some improved grassland and horticulture. There is a small amount of improved grassland with ridge and furrow in the eastern corner of the area. A visually dominant poplar plantation exists to the immediate north of the MOD depot which was probably planted as quickly growing visual screen. The hedgerow structure is poor to average and there is little tree cover. To the north of the lane, semi improved grassland dominates with good to very good ridge and furrow. Here the hedge structure is good with hedge trees and isolated orchard trees. There is a useful riparian strip adjacent to the brook which is dominated by willow. The triangle of land to the west of railway comprises a mix of semi-improved and arable land with some good hedgerows and hedge trees.

- 4.13 This area overall has a low landscape character sensitivity rating. The area is divided into two character areas; to the north the field pattern is open, flat and very low in amenity, historic or ecological value; to the south the existing MOD built form. There are two distant key receptors; one from Gloucestershire National Trail across Oxenton Hill to south east and the other from a network

of alleviated PROW's across Bredon Hill (AONB). There is a significant opportunity through redevelopment to enhance and connect with the wider environment.

What the urban design work has to say

- 4.14 Key considerations within the Ashchurch Developable Area plan;
- Developable area to the north of the railway spur is formed so as to both respect the existing field patterns, and to ensure that new development is read as a natural extension of the Northway area when viewed from a distance. This is the case visually and spatially.
 - Suggesting that any proposed local centre is spatially aligned with the existing Church and nearby railway station – thereby enhancing and reinforcing important existing facilities to create a heart to large scale development that is positively integrating with the existing urban environment rather than creating isolated and incongruous development.
 - Provision for landowners preferred development partner to create single occupier employment area to the northeast corner of the site.
 - Utilises existing road infrastructure to generate a suggested block layout for development.
 - Responds to landscape assessment work to identify important areas of open green space in order to mitigate the potential visual impact of development without the inclusion of this space.

Consultation - what you told us

Flooding

- 4.15 Almost all respondents expressed concerns about flooding in Tewkesbury and the surrounding area. Flood protection measures have been put in place in settlements to the north of Tewkesbury, such as Upton-upon-Severn, and it was felt that this could increase future flood water levels. The Environment Agency has identified that the opening up of the culverted watercourse at the MOD site be a key requirement for any redevelopment and should be integral to masterplanning the site. A waste management plan for the site is also likely to be required. Any redevelopment of the site will have to deal with hazardous waste and potential contaminated land issues. Waste generated at the site will need to be disposed of at a licensed facility.

Open Countryside and Farm Land

- 4.16 Respondents indicated that this area is considered to be important in terms of the biodiversity it offers. The Lower Carrant area is designated as a Worcestershire Special Wildlife Site. There is a concern that agricultural land will become increasingly important for local food production.

Infrastructure

- 4.17 Concerns have been raised over a lack of facilities in the area, namely school places, public transport, mains sewage, leisure facilities, jobs and healthcare facilities. It was also felt that the new development might not provide sufficient affordable housing. It was stated that only two trains a day currently stop at Ashchurch station making it difficult to use the rail network for commuting from here. Railfuture however considered that additional development at Ashchurch would strengthen the case for additional train services from Ashchurch. In addition it was considered that the redevelopment of this site should not prevent its future use as a strategic freight depot. Other respondents suggested that freight services from Ashchurch station should be opened up if the depot site was developed for housing.

Traffic Congestion and Air Pollution

- 4.18 Respondents felt that the existing road network would be unable to cope with increased levels of traffic. New residents would be unlikely to work in Tewkesbury and would therefore be using local roads to access the motorways, Cheltenham and Gloucester. The Highways Agency identified that delivering the new homes at the locations without adversely affecting the service levels on the strategic road network would present a challenge.

Setting of the AONB

- 4.19 It was suggested that any new housing would detract from the setting of Bredon Hill which is designated as part of the Cotswolds AONB and a much visited area. The AONB boundary is just over a mile away to the north of this site.

Other

- 4.20 Concerns were expressed over the viability of the redevelopment potential of the site given its likely contamination issues.

Alternative Sites/Approaches

- 4.21 Significant support was expressed for the development of the Ashchurch Depot as it is a brown field site with easy access to the M5. Respondents considered that the development of this site should take place before green field sites. It was considered to be a sustainable location and was supported by good access to the strategic road network. Others felt that the site should remain in employment use and that the development of this site had flooding implications for land to the east of Tewkesbury. Some respondents queried the suitability of Tewkesbury for a strategic allocation and questioned the linking of Tewkesbury with the much bigger urban areas of Cheltenham and Gloucester and suggested that Tewkesbury should be assessed independently.

Sites Assessment

- 4.22 The redevelopment of this site will be inextricably linked to the extent to which contamination is present across the MOD site. This may also determine the layout of land uses within any future redevelopment. The implication of this is that it is difficult to set out a precise mix of housing and employment on this site. This can be considered further through the development management stage and detailed masterplanning work.
- 4.23 The rail freight head at this location is currently protected under one of the saved Tewkesbury Borough Local Plan policies which is connected to the Local Transport Plan (LTP3) aspiration to consider its potential to rail freight. There is an existing protected potential freight railhead within this Broad Location, though it is not considered that sufficient demand for freight exists to warrant its retention. The retention of the freight railhead would also provide a significant obstacle to the redevelopment of this site and could lead to the delay or frustration of development of a site which is likely to prove challenging.
- 4.24 Only one option has been considered for this strategic allocation. The development of this land could provide a mixed use development to the east of Tewkesbury on previously developed land and on part of the greenfield land to the north, delivering around a mix of residential and employment development.

Conclusions

- 4.25 As the precise land use mix will be determined to a certain extent by the extent and location of contaminants, a mixed use allocation covers the extent of the MOD site. Beyond this to the north, the land is greenfield in nature and can be allocated for housing development. The retention of the rail freight head would result in an inefficient redevelopment scheme, which fails to successfully link the two key parts of the site – north and south of the rail line. If the line were to be retained it would limit the creation of access to the north from the southern part of the site.
- 4.26 The existing culvert should be opened up in the redevelopment of this site and developers will be expected to specifically consider the impacts of this and flood betterment opportunities to support their application.
- 4.27 This strategic allocation would be brought forward in two key phases as the MOD operations cease. The southern extent of the site will be expected to be delivered first. A full strategy for dealing with contaminated land will be required in line with 'DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination'. This is the only strategic allocation which has a significant element of previously developed land and it is recognised that this could create delay in the redevelopment of the site. The JCS authorities will need to maintain a close dialogue with the developers of this site and monitor progress.
- 4.28 Only one option was considered for this potential Strategic Allocation and the plan is set out within appendix 5.

T3: South Ashchurch

Introduction and context

- 4.29 South Ashchurch (T3) lies to the south and east of Junction 9 of the M5, immediately south of the A46. It is bounded to the east by the main railway line. The southern extent of this Broad Location is largely bordered by the village of Fiddington.

4.30 Land immediately adjacent to the A46, opposite the Ashchurch Industrial Estate falls within Flood Zone 1. To the south of this particular area, still within the northern part of this Broad Location, there are flooding constraints which are connected to the land adjacent to the Tirlle Brook. Land adjoining the Tirlle Brook falls within Flood Zone 3b and Flood Zone 2. In addition, this pattern is repeated by an intermediate risk of surface water flooding and some scattered points of high risk. The remainder of this Broad Location to the south lies within Flood Zone 1, with a small strip of land of less and intermediate risk of surface water flooding passing from the south east extent of the area and travelling across towards the M5 motorway.

Landscape and visual impact

4.31 This wider Broad Location is bounded to the north by the A46 and to the east by the main railway line and contains scattered development and is rural in character. The landscape is predominantly flat agricultural farmland with irregular field patterns enclosed by hedgerows. There are a limited number of landscape feature worthy of protection. The landscape of this Broad Location is predominantly flat agricultural farmland with irregular field patterns enclosed by hedgerows. The overall character has been degraded by existing infrastructure and agricultural intensification although some landscape features have been retained, and the level of tranquillity is reduced by the close proximity to major transport routes. There are views of urban development and infrastructure where vegetation allows and there is a lack of cohesion with the surrounding open agricultural landscape. There is one distant key receptor from Gloucestershire National Trail across Oxenton Hill to the south east which has the existing industrial built form behind. The overall sensitivity rating is low.

What the urban design work has to say

- 4.32 Key considerations within the South Ashchurch Developable Area plan are;
- The adjacent area to the north of the site is characterised by employment uses and it is felt to be inappropriate to recommend residential development opposite this scale of development that would only relate spatially to an area already well-established for employment uses.

- The areas to the south of Tirl Brook are very detached from existing urbanised development and offer little opportunity for new development to be successfully integrated with any existing urban development, so would appear as isolated and potentially incongruous features within the wider landscape setting, and so have not been considered.
- Attempt to reinforce the train station as an important “hub” in the urban setting by clustering new residential development nearby and related to existing residential areas.

Consultation - what you told us

Tewkesbury

- 4.33 Development should be focused around Gloucester and Cheltenham rather than Tewkesbury town, as the jobs, shops and facilities are mostly in Cheltenham and Gloucester. Tewkesbury’s needs should be met on brown field sites such as at Ashchurch and not through urban extensions.

Flooding

- 4.34 Almost all respondents expressed concerns about flooding in Tewkesbury town and the surrounding area. Flood protection measures have been put in place in towns to the north of Tewkesbury, such as Upton-upon-Severn, and it was felt that this would increase future flood water levels.

Open Countryside and Farm Land

- 4.35 Respondents indicated that this area is considered to be important in terms of the biodiversity it offers. The Lower Carrant area is designated as a Worcestershire Special Wildlife Site. Concern that agricultural land will become increasingly important for local food production was expressed.

Infrastructure

- 4.36 Concerns raised over lack of facilities in the area, namely school places, public transport, mains sewage, leisure facilities, jobs and healthcare facilities (Tewkesbury Hospital is being downsized). It was also felt that the new development would not provide enough affordable housing.

Traffic Congestion and Air Pollution

- 4.37 Respondents felt that the existing road network would be unable to cope with

increased levels of traffic. New residents would be unlikely to work in Tewkesbury and would therefore be using local roads to access the motorways, Cheltenham and Gloucester.

Setting of the AONB

- 4.38 Any new housing would detract from the setting of Bredon Hill which is designated as part of the Cotswolds AONB and a much visited area. The AONB boundary is just over a mile away to the north of this site.

Alternative Sites/Approaches

- 4.39 Support was expressed for the development of the Ashchurch Depot as it is a brown field site with easy access to the M5. The development of this site should take place before green field sites are considered. Support for development at Ashchurch was also expressed as this was considered to be a sustainable location. Freight services from Ashchurch station should be opened up if the depot site was developed for housing. Others felt that the site should remain in employment use and that the development of this site had flooding implications for land to the East of Tewkesbury. The linking of Tewkesbury with the much bigger urban areas of Cheltenham and Gloucester was questioned and the need for Tewkesbury to be assessed independently put forward. It was stated that only two trains a day currently stop at Ashchurch station making it difficult to use the rail network for commuting from here.

Sites Assessment

- 4.40 The key challenge for this area is to provide development which has the potential to integrate into the existing settlement pattern. Two options were drawn up for this potential strategic allocation and are attached within Appendix 5.

Option One

- 4.41 Option one considered a mixed use development scheme at this location. Approximately 5 hectares of employment located immediately adjacent the motorway junction and between 100-150 units of residential development wrapping around Newtown Farm in the east. Some modestly scaled residential and mixed-use development may help to cross-subsidise the

enhancement and development of employment premises here. Moreover, given this location, a mixed use development could help to create a greater sense of community and improve potential live-work opportunities, which could contribute towards reducing overall levels of commuting and improving the development's carbon footprint. Appropriately scaled and designed residential development, could serve to bolster and enhance the existing community of Ashchurch.

- 4.42 Providing a residential only development at this location was not considered to be an appropriate response to the existing land uses at this location and would not maximise the potential of the strategic road network. The limited amount of housing development at this location would not represent a strategic level of development in residential terms and as such, development at this location would be better suited to job generating uses.

Option Two

- 4.43 Option Two considered a purely employment development scheme. Employment growth here could compliment and work in tandem with current employment sites to the immediate north of this Broad Location and could build upon its existing role as a supplier of competitively priced, flexible accommodation for B1 (business), B2 (general industrial), B8 (Storage and distribution) or other job generating businesses. Furthermore, the particular advantage of this Broad Location is its location immediately adjacent to Junction 9 of the M5, making it attractive to job generating uses. Such development would be appropriately limited to the northern extent of the site.

Conclusions

- 4.44 The adjacent area to the north of the site is characterised by major employment uses and as such, this Broad Location relates spatially to an area already well-established for employment use. Areas to the south of Tirl Brook within this Broad Location are very detached from any existing urbanised development. As such, it would be difficult to successfully integrate any new development within the south of this Broad Location, with existing urban form, thereby rendering it potentially incongruous.

4.45 There is an opportunity to provide a strategic allocation for job generating development in the northern extent of the Broad Location. The development potential at this location is for approximately 14 hectares adjacent to the M5 motorway junction 9, with development limited by the flood plain associated with the Tirlle Brook. This is the only strategic allocation put forward solely for employment uses. It is not an urban extension, but has easy access to the motorway network.