

# CLEVELANDS

BISHOP'S CLEEVE

**PLANNING STATEMENT**

**November 2010**



## Supplement to the Planning Statement and Environmental Statement – 10 November 2010

- I. The Planning Statement and Chapter 4 of the Environmental Statement were prepared following the Secretary of State's revocation of all regional strategies under Section 79(6) of the Local Democracy, Economic Development and Construction Act 2009. However, this action was successfully challenged in the High Court by developer Cala Homes (*Cala Homes (South) Limited v Secretary of State for Communities and Local Government and Winchester City Council [2010] EWHC 2866*) and the decision on 10 November 2010 concluded that powers under Section 79 of this Act could not be used to revoke all Regional Strategies in their entirety.
  
- II. Accordingly, at the time of submitting the outline planning application for Cleavelands on 11 November 2010, the development plan still includes the Regional Spatial Strategy for the South West and the emerging South West Plan is also a material consideration of some weight. The Proposed Changes to the South West Plan specifically include an Area of Search to the North of Bishop's Cleeve (Policy HMA3) and this matter is particularly referred to at paragraphs 4.30 and 4.32 of the Planning Statement and paragraph 4.5.3 of the Environmental Statement.
  
- III. The housing requirement for least 14,600 dwellings to be constructed within Tewkesbury Borough during the period up to 2026 identified in the Proposed Changes to the South West Plan remains a material consideration. The implications of this housing requirement are addressed at paragraphs 5.37 to 5.39 and Tables 5.11 and 5.12 of the Planning Statement. There is no material change to the view that there remains a need for some land to be released for development to meet the five year housing land shortfall which has been identified.
  
- IV. It is, however, recognised that the Secretary of State remains committed to the abolition of Regional Strategies and this is intended to form part of the Localism Bill due to be published in November 2010. In addition, the Secretary of State is also maintaining the view that the impending abolition of Regional Strategies is a material consideration as outline in the letter from the Department for Communities and Local Government to local planning authorities dated 27 May 2010.



## 1. Introduction

- 1.1 The application submitted on behalf of Welbeck Strategic Land (Welbeck) is seeking planning permission for a sustainable urban expansion to the north west of Bishop's Cleeve known as Cleavelands. The specific land uses are identified in Section 3.
- 1.2 Welbeck has an agreement with the landowners to promote the land to the north west of Bishop's Cleeve for development. Welbeck is a specialist land promotion company which has interests in various residential and mixed use particularly across southern England.
- 1.3 The application is in outline form with only approval for access being sought. All other matters are reserved for subsequent approval. The application comprises the following documents:
- Planning Application Form
  - Ownership Certificate
  - Application Fee
  - Drawing No. 4080\_PL\_001 Site Location Plan
  - Drawing No. 22820/101/SK02 Rev C - A435 Access
  - Drawing No. 22820/101/SK06 Rev A - Little Acorns Access
  - Drawing No. 4080\_PL\_002 Master Plan
  - Drawing No. 4080\_PL\_003 Parameters Plan
  - Environmental Statement including the Non Technical Summary
  - Design and Access Statement
  - Flood Risk Assessment
  - Transport Assessment Report and Framework Travel Plan
  - Sustainability Statement
  - Planning Statement
  - Waste Minimisation Statement
  - Utilities Capacity Assessment
  - Energy Strategy
  - Affordable Housing Statement
  - PPS4 Statement and Commercial Report



- Statement of Community Involvement
- Draft Heads of Terms for a Planning Obligation

1.4 It not the intention of this Planning Statement to substantially repeat the content of these documents, in particular the Design and Access Statement (DAS) and the Environmental Statement (ES). Instead, this Planning Statement seeks to provide the planning context for the Cleavelands proposal.

### **Community Involvement**

1.5 Prior to the submission of the application, Welbeck mounted an exhibition on 14 and 15 May 2010 to obtain the views of the local community. These views supplement the comments which have been provided by Bishop's Cleeve Parish Council and others on a 'without prejudice basis'.

1.6 Statutory consultees have been consulted during the Environmental Impact Assessment (EIA) process, including a pre application meeting with Tewkesbury Borough Council. Discussions have also been held with various community and other representatives who have an interest in Bishop's Cleeve and the nature of the proposed development.

1.7 The nature and extent of the consultations which have been undertaken are outlined in the Statement of Community Involvement (SCI).



## 2. Site Description and Surroundings

- 2.1 The site covers approximately 55 hectares (excluding access land) and is located on the north western edge of Bishop's Cleeve, approximately 800 metres from the centre. The site is bounded by existing residential areas on the periphery of Bishop's Cleeve to the south and east, and is contained to the north by Dean Brook which flows from east to west. Allotment gardens lie adjacent to the eastern site boundary. The western boundary comprises existing hedgerows. Not all of the site would be used for built development.
- 2.2 Although the site itself occupies generally level ground, to the north beyond Dean Brook the land rises and contains the site. Within the wider area, to the north and east beyond Gotherington and Bishop's Cleeve the landform rises dramatically to Oxenton Hill and the Cotswold escarpment. To the west of the site lies the Floodplain Farmland landscape of the Severn Vale with the elevated landscapes of the Forest of Dean and the Malvern Hills visible in the distance beyond the River Severn.
- 2.3 Approximately in the middle of the site there is a range of agricultural buildings which are in a poor condition. The only other structure within the site is a foul water pumping station which is located to the east of the agricultural buildings.
- 2.4 Although the character of the site is agricultural it is heavily influenced by the adjoining built forms of development, particularly the residential development which has occurred and is being undertaken to the east of the A435. The site is, however, not currently part of the urban area.
- 2.5 The site is crossed from east to west by a public right of way which initially follows the existing farm access track. There are two other rights of way which commence at Little Acorns. Adjacent to the site are existing footways and cycleways which provide links to the key destinations within Bishop's Cleeve.
- 2.6 There are existing bus services close to the site which provide links to Cheltenham and Tewkesbury where higher order facilities are located.



- 2.7 The centre of Bishop's Cleeve contains a range of local facilities such as retail outlets including Tesco and Lidl stores, commercial and community buildings including the Parish Council's offices and healthcare facilities. To the south west of the site is Malvern View Business Park and there are two other major employment areas along the A435 to the south of the site, including employers such as GE Aviation (formally Smiths) and Capita/Zurich at The Grange. The other main employment area is the Cleeve Business Park. Within Bishop's Cleeve there are currently two primary schools and a secondary school.
- 2.8 The site comprises a number of medium scale agricultural fields associated with Dean Farm which can be accessed via the farm track from the A435 Cheltenham to Evesham Road. The fields are managed as grazing pasture and mowing grass comprising a combination of improved and semi improved pasture subdivided by native hedgerows with scattered hedgerow trees. Pastures are grazed predominantly by sheep. While the hedgerows within the site are largely well maintained, there is evidence in places of the network beginning to break down and some hedgerows have become gappy or overgrown. The remains of an orchard can be seen to the south of Dean Farm.
- 2.9 The analysis undertaken of the site, its current use and its landform demonstrate that there are no physical constraints to its development for housing and other uses. The retention of the sewage pumping station and associated services could be accommodated as part of the master planning for Cleevelands. The proposal would have the effect of 'rounding off' the existing pattern of settlement to the north west of Bishop's Cleeve generally confining built forms of development to the existing extent of the adjoining housing areas.
- 2.10 The approach adopted by Welbeck has been to adopt a holistic view of Bishop's Cleeve and, in particular, the residential areas to the east and south. The growth in this part of Bishop's Cleeve has principally been by the addition of housing estates with very few facilities beyond open space provision. There is a lack of retail, community and employment opportunities which would assist in creating a sense of place and establishing a community. The existing residents are reliant on travelling to other locations within Bishop's Cleeve, principally by private car, just to meet their day-to-day needs such as purchasing newspapers, bread and milk.



- 2.11 Part of the master planning objective has been to consider Cleavelands and the adjacent residential development as a neighbourhood and providing a focal area for the community and local facilities. Welbeck has been mindful of not competing directly with other facilities, especially those provided within the centre of Bishop's Cleeve. One example of the holistic approach being adopted was that early versions of the illustrative master plan included a primary school. However, this proposal no longer features because of the lack of support from the Education Authority.
- 2.12 To establish a focal point and provide some facilities the illustrative master plan includes 'high street' which would be sited to readily accessible to both existing and future residents on both foot and cycle. The details of the proposed high street and its function are contained in the DAS and this Statement. Further, a community facility and formal sports grounds are also proposed.



### 3. The Proposal

3.1 An illustrative Master Plan for Cleavelands is submitted as part of the application and is incorporated in to the DAS and ES. The planning application is on outline form with the means of access being the only matter which would be fixed at this stage. Other matters such as scale and landscape are reserved for future approval. However, the master plan does show the way in which the site could be developed, including the locations of the built forms, open space and structure planting. Therefore, in order to give a high degree of certainty to the outcome of the EIA process, Welbeck has a clear expectation that any planning permission would include conditions requiring the principles of the master plan and the content of the supporting DAS to be adhered to which also incorporates the parameters plan.

3.2 Cleavelands would comprise the following main elements:

- Residential development of up to 550 dwellings of varying tenures and sizes, including 30 dwellings suitable for retired people. The residential development area extends to about 14.9 hectares plus 0.5 hectares for the retirement dwellings. Excluding the retirement dwellings, the average density of development is about 35 dwellings per hectare.
- Up to 35% of the proposed dwellings would be for affordable housing purposes (split 50% social rented and 50% intermediate housing).
- A 'high street' extending to about 1.45 hectares containing employment, retail and live/work units. The retail and employment units would possess a footprint of about 2,350sq m (the total floorspace would be 4,700sq m). No more than four units (maximum gross retail floorspace 475sq m) would be used for Class A purposes as defined in the *Town and County Planning Uses Classes Order 1987*. The employment units would principally be used for Class B1 purposes but the units could also be used for Class D1 purposes which might include healthcare and nursery provision. 16 live/work units are also proposed.
- A facility available to the community situated on a site extending to about 0.2 hectares. The facility is expected to include a community building which would possess a footprint of about 300sq m with about 150sq m at first floor level.



- A 0.7 hectare extension of the existing allotments (some 50 additional plots) including the potential for a new access via the proposed development, parking for about 50 cars and a community composting facility. The allotments would meet the needs of future residents and those members of the community currently on the waiting list for a plot. The potential also exists for other improvements to the allotments including a small building for toilets and storage and notice boards.
- The main vehicular access from the A435 with a secondary access from Little Acorns. The access from the A435 would be a roundabout.
- A hierarchical road network including streets suitable to be incorporated into a bus route and Home Zones or similar shared surfaced areas;
- Extensive areas of formal and informal open space totalling about 37.2 hectares, including formal sports pitches (with a changing room facility), children's play equipment, woodland, community orchard and areas to promote biodiversity.
- Retention of the existing rights of way augmented by new footways and cycleways.
- The open space would include the sustainable urban drainage proposals comprising swales and detention ponds.

3.3 Based on typical net development to gross site area ratios, a 55 hectare site would normally be expected to have capacity for more than the 550 dwellings being proposed. However, through the detailed technical and environmental analysis undertaken by the Consultant team as part of the initial master planning process, the capacity of the site has respond to various different factors including:

- A desire to provide a mix of uses rather than just be a housing estate on the edge of Bishop's Cleeve;
- Adopting a density of development taking into account the location of the site;
- Retention and, where appropriate, the augmentation of archaeological, landscape and ecological assets of the site;
- Providing sufficient space to meet needs of the community, including matters such as parking and incidental green spaces, which recent developments at Bishop's Cleeve have failed to accomplish; and
- Not replicate urban character of development at Deans Lea which the local community did not consider was representative of Bishop's Cleeve.



Accordingly, it was soon evident that an appropriate number of units would be about 550 dwellings.

- 3.4 The DAS contains more detailed information which establishes parameters for the proposed development. The DAS explains the master planning of Cleavelands and has, itself, been informed by the EIA process. The content of the DAS is not repeated in detail in this Statement.
- 3.5 As identified in the DAS, the maximum height of any building will be the equivalent of a three storey house. These taller buildings would be located within and close to the high street. Similarly, buildings equivalent of two and a half storey houses (i.e. those which utilise the roof space for accommodation) would be located around the high street and used as accent buildings at particular locations within the proposed development. Generally, over the majority of the site, the height of the buildings will be equivalent to a two storey dwelling.



## **4. Relevant Planning History and Development Plan Policies**

### **Planning Applications**

- 4.1 There have been no relevant planning applications.

### **Development Plan**

- 4.2 Following the Secretary of State's revocation of Regional Strategies in June 2010, the Regional Planning Guidance for the South West no longer forms part of the development plan. The Regional Strategies are proposed to be formally abolished sometime in 2011. Therefore, the development plan comprises the saved policies of the *Gloucestershire Structure Plan Second Review 1991-2011* (SP - adopted November 1999) and the *Tewkesbury Borough Local Plan to 2011* (LP - adopted March 2006).

### **Gloucestershire Structure Plan Second Review 1991-2011**

- 4.3 The intention of this section is to identify those policies which affect the principle and location of new developments and other material development control type policies. However, it should be noted that there are physical and strategic policy constraints to development within Tewkesbury Borough, particularly the Cotswolds Area of Outstanding Natural Beauty, Green Belt and the floodplain of the River Severn.
- 4.4 The *Gloucestershire Structure Plan Second Review 1991 -2011* as its title implies only covers the period up to 2011. Accordingly, the housing provision and distribution figures identified in Policies H.1 and H.2 are nearing the end of their useful life and are significantly out of date.
- 4.5 Policy S.1 is concerned with directing development to sustainable locations principally within and adjacent to the larger settlements and towns within Gloucestershire. Policy H.4 gives priority for residential development within Gloucester and Cheltenham and then to locations adjacent or close by which are or can be easily and conveniently accessed by means of transport other than the private car. Policy EMP.1 also reflects this approach. This general area is known



as the Central Severn Vale (CSV) and is identified as being the administrative areas of Gloucester City and Cheltenham Borough, and those parts of Tewkesbury Borough and Stroud District in close proximity to Cheltenham and Gloucester which can be easily and conveniently accessed by public transport. It is considered Bishops Cleeve falls easily in to this category and therefore represents a settlement where residential development should be directed.

- 4.6 Bishop's Cleeve is not specifically referred to in these policies but is a settlement within the CSV sub area which is conveniently and easily accessible by public transport.
- 4.7 Policy S.3 gives priority to development within the existing built up areas of settlements, particularly land available for redevelopment. Policy S.4 conversely seeks to limit development in the open countryside.
- 4.8 When providing for development, Policy S.5 requires regard to be had to the need for community facilities and services, including education, health and cultural facilities, local shopping facilities, sport and leisure facilities, transport services and infrastructure, housing including affordable housing and public utilities.
- 4.9 Policy S.6 seeks to safeguard various aspects of the environment which contribute to local character and distinctiveness including the setting of settlements and the quality of the landscape. Policy S.7 also seeks to maintain the quality of the environment including through high standards of design and traffic management.
- 4.10 Although there is no specific target, Policy H.7 identifies that provision should be made for affordable housing to meet a demonstrable local need.
- 4.11 Policies H.8 and H.9 concern the form of any residential development including the provision of a range of dwelling sizes to meet local requirements and a density at a level which makes the best use of land consistent with environmental considerations.



- 4.12 Policy T.1 requires new development should be located so as to minimise the length and number of motorised journeys, and encourage the use of public transport, cycling and walking. Policies T.2, T.3 and T.4 support this aim by promoting network of safe and convenient footways and cycleways and enhancements to public transport, including the promotion of improvements to passenger services associated with proposed development.
- 4.13 Other policies of the Structure which have been considered as part of the Cleavelands proposal include:

**Table 4.1: Other Structure Plan Policies**

Policy	Subject Area
T.8	Car Parking
T.9	Public Parking Provision
M.6	Mineral Sterilisation
EN.1	Energy Conservation
NHE.1	Protecting Countryside
NHE.2	Enhancing Biodiversity
NHE.3	Protecting Best and Most Versatile Agricultural Land
NHE.5	Special Landscape Areas
NHE.6	Conserving the Historic Environment
RE.2	High Standard of Open Space
RE.3	Improve Public Access to Countryside
W.1	Adequate Water Resources
F.1	Flood Risk
P.1	Pollution

### **Tewkesbury Borough Local Plan to 2011**

- 4.14 The intention of this section is to identify those policies which affect the principle and location of new developments and other material development control type policies.
- 4.15 The *Tewkesbury Borough Local Plan to 2011* was prepared in general conformity to the Structure Plan. Accordingly, the housing provision and distribution figures identified in Policies H1 are nearing the end of their useful life and are significantly out of date. A proportion of the identified allocations have been developed and other sites are still being developed albeit it is unlikely that all the allocations will actually be completed by 2011. However, irrespective of this delay in development, there remain issues with the housing land supply.



- 4.16 Reflecting the Structure Plan, Policy HOU2 supports residential development within the defined settlement boundaries of identified settlements which possess a suitable level of services and facilities, including a good level of accessibility by public transport to surrounding urban areas. Conversely, Policy HOU4 restricts development outside of the development boundaries of settlements.
- 4.17 Policy HOU 13 identifies a requirement for about 1,320 affordable housing units to be delivered through the Local Plan. The Council will seek to negotiate with developers for the provision of an element of affordable housing on sites of 15 or more dwellings or on sites in excess of 0.5 hectares within settlements.
- 4.18 The other Local Plan policies which have been considered as part of the Cleavelands proposal include:

**Table 4.2: Other Local Plan Policies**

Policy	Subject Area
GNL2	Design Requirements for Major Development Proposals
GNL8	Energy Efficient Development
GNL11	Implementation
GNL15	New Community Facilities
HOU11	Elderly Persons' Accommodation (Independent Units)/ Special Needs Housing
HOU13	Affordable Housing
EMP2	Employment Uses Within Settlements Outside Allocated Sites
TPT1	Access for Development
TPT3	Pedestrian Networks
TPT5	Cycle Network Enhancements
TPT6	Cycle Parking
TPT9	Public Transport Corridors
EVT2	Light Pollution
EVT3	Noise Pollution
EVT5	Development in High, and Low to Medium Flood Risk Areas
EVT9	Sustainable Drainage Systems
LND4	Landscape – Countryside Protection
LND7	Landscaping of New Developments
RET4	New Local Facilities
RCN1	Outdoor Playing Space
RCN2	Provision of Sports Facilities
NCN5	Protection of Important Natural Features/Biodiversity
NCN6	New and Restored Ponds



## Comments About the Development Plan Policies

- 4.19 As previously noted, Bishop's Cleeve forms part of the CSV as defined in the Structure Plan. In accordance with SP Policies H.4 and E.2, and reflecting SP Policy S.1, most residential and employment development is to be provided within the CSV where a range of facilities exist and there are opportunities to maximise public transport. After development within Cheltenham and Gloucester, priority is then given to locations adjacent or close to these settlements which include Bishop's Cleeve. The identification of Bishop's Cleeve as a location for growth reflects the hierarchical approach of the Structure Plan, including SP Policy S.2.
- 4.20 The site is outside the residential development boundary of Bishop's Cleeve and is not allocated for development. However, LP Policy HOU2 does recognise Bishop's Cleeve as a large settlement containing a primary level of community facilities and services. Accordingly, albeit not within the residential development boundary, housing development is supported subject to the satisfactory integration of the proposal within the framework of the settlement.
- 4.21 The southern part of the site was proposed as a housing allocation as part of the Revised Deposit Tewkesbury Borough Local Plan (the general extent of this proposed allocation was south of the agricultural buildings and access track). The allocation was not progressed following receipt of the Inspector's report but the site 'scored' well against the subsequent *Site Sustainability Assessment* undertaken by the Council in May 2004 comparing housing sites within Tewkesbury Borough during the preparation of the Proposed Modification published June 2004.
- 4.22 A review of the development plan and related other policy documents indicates that the site is not:
- Within or adjoining the Green Belt.
  - Within or adjacent to the Cotswold Area of Outstanding Natural Beauty.
  - Within or adjacent to either a Special Landscape Area or a Landscape Protection Zone.
  - Part of, or adjoins, a Site of Special Scientific Interest, a Local Nature Reserve, a Key Wildlife Site or a Special Area of Conservation.



- A Regionally Important Geological Site.
  - Important open space.
  - Within or close to a Scheduled Ancient Monument, a Battlefield, a Historic Park or Garden or a Conservation Area.
  - Safeguarded for minerals extraction.
  - Protected or safeguarded for infrastructure improvements.
- 4.23 Although not a specific policy designation, the site is not within the sensitive gap between Bishop's Cleeve and Gotherington and would not contribute to the visual and physical coalescence of these settlements contrary to SP Policy S.1.

### **Emerging Development Plan Policies**

- 4.24 The emerging Gloucester Cheltenham and Tewkesbury Joint Core Strategy Issues and Key Questions (JCS – November 2009) was being produced in accordance with the now revoked South West Plan. The JCS included provision for 1,000 dwellings to be developed to the north of Bishop's Cleeve. In addition to new homes, the emerging proposals indicate that any sustainable urban extension at Bishop's Cleeve should also include land for employment, education, community and other infrastructure uses. It should be noted that there was not suggestion in the JCS that the development being proposed ought to be part of an extension of the approached scheme at Homelands Farm.
- 4.25 The three local authorities preparing the JCS have agreed to continue the joint working arrangements for Gloucester, Cheltenham and Tewkesbury (the Sub Area).
- 4.26 Regard has also been had to the *Gloucestershire Waste Core Strategy Preferred Options* (January 2008) and the *Gloucestershire Supplementary Planning Document Waste Minimisation in Development Projects* (September 2006). The relevance of these documents is considered the Waste Minimisation Statement.

### **National Policies**

- 4.27 The Government's national planning policy and guidance on various aspects of planning are set out in its Planning Policy Guidance Notes (PPG) and Planning



Policy Statements (PPS). The relevant national planning policy guidance and statements include:

- PPS1: *Delivering Sustainable Development* and the supplement *Planning and Climate Change*
- PPS3: *Housing*
- PPS4: *Planning for Sustainable Economic Growth*
- PPS5: *Planning for the Historic Environment*
- PPS7: *Sustainable Development in Rural Areas*
- PPS9: *Biodiversity and Geological Conservation*
- PPG13: *Transport and A Guide to Better Practice*
- PPG17: *Planning for Open Space, Sport and Recreation*
- PPS22: *Renewable Energy*
- PPS23 *Planning and Pollution Control*
- PPG24 *Planning and Noise*
- PPS25: *Development and Flood Risk*

### Other Local Policy Documents

- 4.28 The Borough Council also has Supplementary Planning Guidance on Affordable Housing. An Affordable Housing Statement accompanies the application.

### Other Material Documents

- 4.29 As noted, the context for the JCS proposal was the now revoked *South West Plan* (SWP). Growth at Bishop's Cleeve did not feature in the submitted version of the SWP (April 2006). Instead, there was a proposal to include land to the north of Bishop's Cleeve within the Green Belt. However, the independent Panel conducting the Examination in Public concluded that Bishop's Cleeve should be a location for further growth. Specifically, the Panel commented in their report that:

*'These areas are regarded as part of the Gloucester SSCT here as (sic) somewhat inconsistently Bishop's Cleeve is regarded as a 'dormitory' of Cheltenham. On our Panel Tour of the Cheltenham area we noted that when the development associated with the racecourse to the north of Cheltenham and the employment area to the south of Bishop's Cleeve are taken into account there is little doubt that there is a clear functional relationship between the settlements. In our view Bishop's Cleeve, including the employment zone to the south forms part of the functional urban area of Cheltenham.'* (paragraph 4.0.22)



*'Lastly, we have looked at Bishop's Cleeve itself, which in functional if not physical terms we regard as part of the wider Gloucester/Cheltenham conurbation and SSCT area. Development to the south of Bishop's Cleeve would diminish the separation from Cheltenham which we find objectionable for the same reasons as land close to Cheltenham racecourse. Land to the north of the settlement is, however, unconstrained by existing Green Belt and, in the Panel's view, provides ample opportunity for sustainable strategic future outward growth of the settlement. This would support the strengthening of existing transport links between the two settlements and along the Gloucester/Cheltenham development corridor and would not impinge on sensitive areas of countryside. Bishop's Cleeve also has an established employment base which would contribute to balanced development and avoid reinforcing dormitory relationships. We therefore recommend an additional area of search here, again for about 1,000 dwellings in total.'* (paragraph 4.3.39)

*'The proposed extension of Green Belt coverage north of Cheltenham would have no direct impact on either Cheltenham or Gloucester but would effectively preclude northward growth options for Bishop's Cleeve. The Panel finds no real likelihood of this settlement merging with Gotherington or that any of the other purposes of Green Belts, listed in paragraph 1.5 of PPG2, would thereby be served. Unplanned encroachment into the countryside north of Bishop's Cleeve, in particular, could be more suitably prevented by identification of a development boundary around the settlement through the LDF process and the normal operation of our recommended Policy C2.'* (paragraph 4.3.46)

- 4.30 The emerging Proposed Changes to the SWP (July 2008) identified land to the north of Bishop's Cleeve as an 'Area of Search' for up to 1,000 dwellings (SWP Policy HMA3).
- 4.31 Planning permission was granted on appeal for 450 dwellings at Homelands Farm and, accordingly, there would have been a requirement to identify additional land for 550 dwellings. If further growth is required, the options are Clevelands, further development at Homelands Farm within the 'Gotherington Gap' or land to the south of the village within the Green Belt. Consideration of potential alternative locations for growth is contained in Section 5.
- 4.32 Proposed Change SWP Policy HMA3 also proposed that at least 14,600 dwellings to be constructed within Tewkesbury Borough during the period up to 2026. Further consideration the housing position is contained in Section 5 following the SWP's revocation.



4.33 There are several other documents which form part of the background to the submission of the outline planning application including:

- *The Annual Monitoring Report published by the Borough Council.*
- *The Gloucestershire Local Projections*
- *The Gloucestershire and Districts Strategic Housing Market Assessment*
- *The Tewkesbury Borough Strategic Housing Land Availability Assessment*
- *The Gloucestershire Level 1 Strategic Flood Risk Assessment*
- *NI 159: Five Year Housing Land Supply*
- *Building For Life*
- *South West Regional Development Agency's Sustainability Checklist*
- *Tewkesbury Sustainable Community Strategy*
- *Bishop's Cleeve Parish Council Four Year Plan to 2014*



## 5. Housing Land Position

### Context

- 5.1 The revocation of Regional Strategies does not remove the need for sufficient housing land to be identified to meet the needs of the community. Indeed, the Government's Chief Planner in a letter dated 6 July 2010 stated that, although local planning authorities would be responsible for establishing the right level of local housing provision in their area, *'Local authorities should continue to collect and use reliable information to justify their housing supply policies and defend them during the LDF examination process. They should do this in line with current policy in PPS3'*. Further, *'Authorities may base revised housing targets on the level of provision submitted to the original Regional Spatial Strategy examination (Option 1 targets), supplemented by more recent information as appropriate'*.
- 5.2 The Chief Planner also confirmed that there was still a need for local planning authorities to provide a 5 year land supply of deliverable sites in accordance with the requirements of PPS3. In addition, the development plan ought to identify sufficient sites and broad areas for development to deliver their housing ambitions for at least 15 years from the date the plan is adopted.

### Housing Need and Target

- 5.3 The historic nature of the extant Structure and the Local Plan mean that the housing provision for Tewkesbury Borough included in the development plan is materially out of date. Further, these targets do not cover a 15 year time horizon by only covering the period up to 2011.
- 5.4 The Option 1 housing targets were identified in the SWP as submitted to the Secretary of State in April 2006. Since the housing targets were prepared, there has been the publication of up to date national and local population and household projections which should supplement any Option 1 housing figures.
- 5.5 Against the intention for a JCS to be prepared, the approach adopted in this Statement is to consider the likely housing needs for both the Cheltenham and



Gloucester Sub Area (broadly equivalent to the CSV identified in the Structure Plan but excluding Stroud District) and the specific requirement for Tewkesbury Borough.

- 5.6 For the period up to 2026, the SWP Option 1 housing target proposed 1,525 dwellings per annum within the Sub Area of which 525 dwellings per annum would have been within Tewkesbury Borough. The Secretary of State's Proposed Changes to the SWP indicated a housing provision for the Sub Area of about 1,710 dwellings per annum of which 730 dwellings would have been within Tewkesbury Borough. It should be noted that the SWP Proposed Changes also included 3,500 dwellings to the south of Gloucester within Stroud District which would have been in addition to the Sub Area housing provision (i.e. an additional 175 dwellings equating to a total of 1,885 dwellings per annum).
- 5.7 The *Gloucestershire Local Projections 2010* (June 2010) prepared by Gloucestershire County Council contains trend based population and household growth forecasts for the period between 2008 and 2033. It is understood that this document will be used as part of the evidence base to establish the housing targets in the JCS. In summary, for the period 2008 to 2026, the projections suggest the following increases:

**Table 5.1: Local Population and Household Forecasts 2008-2026**

<b>Administrative Area</b>	<b>Population Growth</b>	<b>Households Growth</b>
Cheltenham	8,400	9,200
Gloucester	26,200	16,100
Tewkesbury	7,100	6,700
<b>Sub Area Total</b>	<b>42,700</b>	<b>32,000</b>

- 5.8 The forecast annual level of household growth within the Sub Area between 2008 and 2026 is about 1,780 households. Allowing for vacancy rates and other factors, Welbeck estimate that the household growth equates to a housing requirement of about 1,860 dwellings per annum (say a total of 33,300 dwellings over the period).



**Table 5.2: Estimated Dwelling Requirement 2008-2026**

<b>Administrative Area</b>	<b>Housing Requirement 2008 - 2026</b>	<b>Annual Requirement</b>
Cheltenham	9,570	531
Gloucester	16,750	931
Tewkesbury	6,980	388
<b>Sub Area Total</b>	<b>33,300</b>	<b>1,850</b>

- 5.9 Both the household growth forecast and estimated number of dwellings are above the annual housing provision for the Sub Area contained in the submission version of the SWP (1,525 dwellings) and the Proposed Changes (1,710 dwellings). However, it should be noted that the dwelling provision and distribution in Table 5.2 does not take into account the administrative areas of the three authorities; the limited and finite availability of land within the urban areas of Cheltenham and Gloucester, and the physical and policy constraints to development. These matters are considered in more detail below.
- 5.10 The most recent population projections published by the Office for National Statistics (ONS) in May 2010 suggest that the population growth of the Sub Area will be greater than the local forecast for the period 2008 to 2026. The ONS forecast a population growth of about 44,300 people with a population increase of 10,900 within Tewkesbury Borough. This level of population growth equates to about 34,640 dwellings within the Sub Area taking into account the same factors identified in paragraph 5.8.
- 5.11 *The Gloucestershire and Districts Strategic Housing Market Assessment (SHMA – January 2009)* includes an estimated number of new households likely to form each year across the county over a five year period. Over the period, the annual number of new households across the Sub Area is forecast to be 2,523 equating to about 2,624 dwellings. Some 618 households would be formed per year in Tewkesbury Borough during the five year period. Allowing for vacancy rates and other adjustments, the level of household growth equates to about 643 dwellings per year.
- 5.12 The significant implication of the more recent information which has been published demonstrates that reliance can no longer be placed on the Option 1 housing figures. Instead, it is evident that the housing needs of the Sub Area are



greater than the Option 1 figures and should be at least, if not more, than the revoked SWP Proposed Changes.

**Table 5.3: Estimated Housing Target for Tewkesbury Borough**

	<b>Annual Provision</b>	<b>Provision 2008-2026</b>
SWP Option 1	1,525	27,450
SWP Proposed Changes	1,710	30,780
GCC Forecast	1,850	33,300
ONS Projection	1,924	34,640
SHMA Extrapolated	2,624	47,230
<b>Average Figures</b>	<b>1,923</b>	<b>34,680</b>

Note: *Excludes development in Stroud District*

- 5.13 For the purposes of this Planning Statement, the local forecast prepared by the County Council is adopted as the basis for the likely housing requirement for the period 2008 to 2026.

**Committed and Urban Housing Supply**

- 5.14 As at April 2008, the Annual Monitoring Reports and Housing Land Monitors for the three authorities within Sub Area suggested that there were committed sites which could deliver up to 11,950 dwellings, including sites at Brockworth, Longford and Bishop’s Cleeve but excluding other potential growth locations such as Leckhampton and Innsworth.
- 5.15 In addition, based on the published Strategic Housing Land Availability Assessments, there could be scope for the urban areas of Cheltenham and Gloucester (and to a limited extent the urban areas within Tewkesbury Borough) to accommodate about 10,000 dwellings during the period up to 2026 which has been adopted for the purpose of this Planning Statement albeit Welbeck remain to be convinced about this level of capacity. These housing provision figures are considered maxima because they assumed that the committed and identified sites would be unconstrained and would be developed to their full capacity.
- 5.16 The potential maximum housing provision from these sources of supply is about 21,950 dwellings.



## Residual Land Requirement

- 5.17 Taking into account commitments and other urban sites, there is a 'to find' figure within the Sub Area of about 11,350 dwellings which would need to be delivered on greenfield sites, mainly as urban extensions, within the Sub Area during the period 2008 to 2026.

## Potential Urban Extension

- 5.18 At the time Regional Strategies were revoked, the Chief Planner specifically commented that *'The planning data and research they [Regional Local Authority Leaders' Boards] currently hold will still be available to local authorities for the preparation of their local plans whilst they put their own alternative arrangements in place for the collection and analysis of evidence'*. Accordingly, consideration has been given to the various research documents which were produced as part of the preparation of the SWP, including:

- *Strategic Green Belt Review*, Colin Buchannan February 2006
- Cheltenham Green Belt Review, AERC, March 2007
- *South West Draft Urban Extension Evidence Base Review*, Arup, February 2007
- *Shaping the Future of Cheltenham and Gloucester to 2026*, SWRA, January 2005
- *Cheltenham and Gloucester Joint Study Area Detailed Advice*, Gloucestershire CC et al, September 2005
- *Background Paper: Strategic Reassessment of the Green Belt*, Gloucestershire CC,
- Landscape Issues: Sources: *Shaping the Future of Cheltenham and Gloucester to 2026*, SWRA, January 2005
- *Cheltenham and Gloucester Joint Study Area Detailed Advice*, Gloucestershire CC et al, September 2005
- *Urban Extensions Boundary Definitions Study*, ENTEC, July 2010
- *Background Paper: Constraints Officer Working Group*, Gloucestershire CC et al
- *Panel Report on the South West Regional Spatial Strategy*
- *Sustainability Appraisal of the South West RSS: Additional SA Work*, LUC, July 2010



- *Initial Sustainability Appraisal of the Cheltenham and Gloucester Joint Study Area, January 2006*
- Recent appeal decisions to the north of Gloucester and south of Cheltenham.
- The background documents to the Tewkesbury Borough Local Plan.

5.19 It is also relevant to note that the Secretary of State comment that Councils are free to protect Green Belt surrounding towns across the country and prevent encroachment on to the Green Belt. Both Cheltenham and Gloucester were cited by the Secretary of State in the footnote to the press release dated 6 July 2010 as areas where Green Belt changes were being proposed and could now be protected.

5.20 Based on an initial sieving exercise, Table 5.4 is a summary of the conclusions which have been drawn from the various research documents and other data sources.

**Table 5.4: Initial Urban Extension Sieving Exercise**

Location	Comments	Potential
North and North East Cheltenham	<ul style="list-style-type: none"> <li>▪ Critical Green Belt function between Cheltenham, Bishop's Cleeve and Southam</li> <li>▪ Eastern extent within the Cotswold AONB</li> <li>▪ Setting of AONB</li> <li>▪ Impact on the racecourse</li> </ul>	No
East and South East Cheltenham	<ul style="list-style-type: none"> <li>▪ Within Cotswold AONB</li> </ul>	No
South Cheltenham	<ul style="list-style-type: none"> <li>▪ Green Belt function between Cheltenham, Surdington and Brockworth but some land already excluded at Leckhampton</li> <li>▪ South eastern extent within Cotswold AONB</li> <li>▪ Contribution to the setting of Cheltenham and AONB</li> <li>▪ Attractive patchwork of undisturbed small fields and orchards at Leckhampton</li> <li>▪ Some grade 2 agricultural land</li> </ul>	Some Potential
South West Cheltenham	<ul style="list-style-type: none"> <li>▪ Critical Green Belt function between Cheltenham and Gloucester</li> </ul>	No
West Cheltenham	<ul style="list-style-type: none"> <li>▪ Critical Green Belt function between Cheltenham, Churchdown and Gloucester</li> <li>▪ Potential nuisance Impacts associated with sewage treatment works and airfield</li> <li>▪ Historic landscape</li> </ul>	No



North West Cheltenham	<ul style="list-style-type: none"> <li>▪ Subject to scale, urban sprawl into Green Belt and critical gap between Cheltenham and Bishop's Cleeve</li> <li>▪ Impact on Junction 10, M5 motorway</li> <li>▪ Ease of access for long distance commuting</li> <li>▪ Areas of flooding limit development</li> <li>▪ Historic assets within the area including Listed Buildings and Conservation Area</li> </ul>	Some Potential
North Gloucester	<ul style="list-style-type: none"> <li>▪ Subject to scale, urban sprawl into Green Belt</li> <li>▪ Areas of flooding limit development</li> <li>▪ Potential nuisance Impacts associated with sewage treatment works</li> <li>▪ SSSI</li> <li>▪ Severance due to major road</li> </ul>	Some Potential
North East Gloucester	<ul style="list-style-type: none"> <li>▪ Critical Green Belt function between Cheltenham, Churchdown and Gloucester</li> <li>▪ Impact on Churchdown Hill</li> <li>▪ Impact on Junction 11, M5 motorway</li> <li>▪ Nuisance from airfield</li> </ul>	No
East Gloucester (Brockworth)	<ul style="list-style-type: none"> <li>▪ Green Belt function between Cheltenham, Surdington and Brockworth</li> <li>▪ Impact on Junction 11a, M5 motorway and A417</li> <li>▪ Ease of access for long distance commuting</li> <li>▪ Noise from major roads</li> <li>▪ Rolling landscape adjacent to AONB</li> </ul>	Some Potential
South East Gloucester	<ul style="list-style-type: none"> <li>▪ Generally outside Sub Area</li> <li>▪ Impact on Robinswood Hill</li> <li>▪ Setting of AONB</li> <li>▪ Some grade 2 agricultural land</li> </ul>	No
South Gloucester	<ul style="list-style-type: none"> <li>▪ Outside the Sub Area</li> <li>▪ Setting of Robinswood Hill</li> <li>▪ Impact on Hunts Grove Ridge</li> <li>▪ Impact on Junction 12, M5 motorway</li> <li>▪ Severance by railway and poor local road network</li> </ul>	Some Potential
South West Gloucester	<ul style="list-style-type: none"> <li>▪ Outside Sub Area</li> <li>▪ Impact on Junction 12, M5 motorway</li> <li>▪ Ease of access for long distance commuting</li> <li>▪ Distance from centre</li> </ul>	No
West and North West Gloucester	<ul style="list-style-type: none"> <li>▪ Flooding</li> </ul>	No
Bishop's Cleeve	<ul style="list-style-type: none"> <li>▪ Critical Green Belt between Cheltenham, Bishop's Cleeve and Southam limited to south</li> <li>▪ Cotswold AONB to east</li> <li>▪ Setting of Cotswold AONB and Nottingham Hill to north</li> <li>▪ Gap between Bishop's Cleeve and Gotherington to north</li> </ul>	Some Potential



Other Potential Locations		
Stoke Orchard	<ul style="list-style-type: none"> <li>▪ Inadequacy of local roads</li> <li>▪ Remote from services</li> </ul>	No
Tewkesbury/ Ashchurch	<ul style="list-style-type: none"> <li>▪ Constrained by administrative boundary,</li> <li>▪ Floodplains</li> <li>▪ Impact on Junction 9, M5 motorway</li> <li>▪ Concerns about encouraging long distance commuting.</li> </ul>	Some Potential
New Village	<ul style="list-style-type: none"> <li>▪ Discounted within Sub Area due lack of a suitable site sufficiently remote and unconstrained to create a self contained community delivering 10,000 dwellings by 2026.</li> </ul>	No

### Bishop's Cleeve

5.21 The analysis undertaken indicates that Bishop's Cleeve is a location which could accept additional growth. However, as indicated in Table 5.4 there are constraints on the direction of growth. These constraints are summarised in Table 5.5.

**Table 5.5: Locations for Growth Bishop's Cleeve**

Location	Comments	Potential
North	<ul style="list-style-type: none"> <li>▪ Gotherington Gap</li> <li>▪ Grade 2 and 3a agricultural land</li> <li>▪ Capacity of local road network</li> <li>▪ Setting of the Cotswold AONB and the SLA</li> </ul>	No
North East and East	<ul style="list-style-type: none"> <li>▪ Setting and direct impact on Cotswold AONB</li> </ul>	No
South East	<ul style="list-style-type: none"> <li>▪ Critical Green Belt function between Cheltenham, Bishop's Cleeve and Southam</li> <li>▪ Extension open space</li> <li>▪ Setting of the Cotswold AONB</li> </ul>	No
South West	<ul style="list-style-type: none"> <li>▪ Critical Green Belt function between Cheltenham, Bishop's Cleeve and Southam</li> <li>▪ High quality agricultural land</li> </ul>	No
West	<ul style="list-style-type: none"> <li>▪ Critical Green Belt function between Cheltenham, Bishop's Cleeve and Southam</li> <li>▪ Proximity to Wingmore waste disposal facility</li> </ul>	No
North West	<ul style="list-style-type: none"> <li>▪ Crossing A435</li> </ul>	Yes

5.22 The most appropriate direction for growth at Bishop's Cleeve would be to the north west of the settlement.



- 5.23 It should be noted that in the context of the documents considered as part of the potential locations for growth exercise undertaken on behalf of Welbeck only limited weight was given to the *Urban Extensions Boundary Definitions Study* because of serious concerns about its methodology and its conclusions. This Study fails to give sufficient weight to landscapes of national importance, such as the Cotswolds AONB and the relevant Management Plan. Furthermore, the study does not treat the various urban extensions located close to the AONB in a consistent manner. The Study has no status as a policy document of the Council and thus should be accorded very little weight.
- 5.24 Dealing specifically with the land to the north of Bishop's Cleeve which includes Homelands Farm, the designated Area of Search is immediately abutted to the east by the steep escarpment of the Cotswolds, to the north by the strongly rural setting of Gotherington village, and to the south by the northern edge of Bishop's Cleeve. Beyond the A435 Cheltenham Road to the west lies the open valley of the Dean Brook. However, it is surprising that the Study does not mention the key factor of the landscape and visual importance, the AONB, until well into the assessment and then gives it little weight. Perversely, The Study concludes that the landscape west of the A435 is of higher sensitivity than that which actually abuts the AONB and which also provides the critical separation between Gotherington and Bishop's Cleeve.
- 5.25 Despite acknowledgement that there will be an impact on landscape character from the Cotswolds (paragraph 7.7.4), the Study concludes that development close to the foot of the AONB escarpment is preferable to encroachment upon the undesignated Vale of Gloucester to the west. This is clearly at odds with national planning policy as set out in PPS7.
- 5.26 Welbeck is also mindful that at the time of the Study's publication on 9 August 2010, Councillor Steve Jordan, Chair of the Joint Core Strategy Member Steering Group, said that it was reflected *'a point in time and provides useful information but it will not predetermine development options across the area. The RSS [Regional Spatial Strategy] housing and employment targets have gone. We must now set our own targets, and then determine where best to locate the necessary development. We have a great opportunity to take a fresh look at how we accommodate development in a way that reflects the needs of our communities.'*



This statement is reflected in the approach adopted by Welbeck albeit a similar conclusion to the SWP Proposed Changes is reached.

### Capacity of the Potential Urban Extensions

5.27 Further analysis of the capacity of the locations with some potential has been undertaken to seek to establish what might be a reasonable number of dwellings which could be accommodated and delivered by 2026 without causing material harm to policy or other constraints. Table 5.6 summarises this analysis and indicates a capacity for each potential location.

**Table 5.6: Capacity of Locations**

Location	Comments	Welbeck's Capacity
South Cheltenham	Potentially would require land to be released from the Green Belt. Need to protect landscape setting of Cheltenham and the AONB.	1,000
North West Cheltenham	Would require land to be released from the Green Belt. Growth would be contained by physical features such as roads and floodplain. Questions raised previously about availability of some land. Phasing of development suggests 3,000 dwellings would be a reasonable number of dwellings which could be delivered by 2026.	3,000
North Gloucester	Would require land to be released from the Green Belt. Scope for growth but need to avoid floodplain, harm to SSSI and nuisance from sewage treatment works.	2,000
East Gloucester (Brockworth)	Would require land to be released from the Green Belt. Impacts on strategic road network due to ease of access for commuting. Landscape impact along A419 and AONB	500
South Gloucester	Although outside Sub Area potential for some growth to meet Gloucester's housing needs but scale constrained by road capacity and severance by railway.	1,000
Bishop's Cleeve	Unconstrained land available to north west.	550
<b>Other Potential Locations</b>		
Tewkesbury/Ashchurch	Significant growth constrained by administrative boundary, floodplains and Junction 9, M5 motorway. Concerns about encouraging long distance commuting.	500
<b>Total</b>		<b>8,550</b>

5.28 In addition, provision ought to be made for some development occurring at some other settlements within Tewkesbury Borough in the order of 2,800 dwellings.



## Housing Distribution

- 5.29 Based on the information outlined in this Statement, the following housing target is proposed for the period 2008 to 2026:

**Table 5.7: Housing Targets and Distribution 2008-2026**

Administrative Area	Housing Target	Annual Target
Cheltenham	8,300	461
Gloucester	11,700	650
Tewkesbury	12,300	683
<b>Sub Area Total</b>	<b>32,300</b>	<b>1,794</b>

Note: *Plus 1,000 dwellings at South Gloucester within Stroud District (about 55 per annum)*

## Five Year Supply

- 5.30 PPS3 states that local planning authorities should consider favourably planning applications for housing where there is less than a five year supply of deliverable sites or the Local Development Documents have not been reviewed to take into account policies in PPS3. The latter clearly applies in Tewkesbury Borough where PPS3 was first published in the same year as the adoption of the Local Plan and only limited progress has been made to progress the JCS.
- 5.31 The *Annual Monitoring Report* (AMR - December 2009) includes information concerning housing land availability within Tewkesbury Borough and the housing trajectory. According to the Council's *NI159: Five Year Housing Land Supply* document, the supply of housing land for 1 April 2010 to 31 December 2015 represented 122½% of the requirement based on the revoked SWP housing requirement. However, Welbeck disagree with this statement.
- 5.32 Welbeck question whether some of the sites relied upon by the Council will delivery the anticipated capacity. Based on Appendix B of the AMR rather than NI159, Table 5.7 indicates those sites where the supply of housing is uncertain or should not be included in the housing figures. The supply figures do not include sites currently within the Green Belt at Longford, Shurdington and East Gloucester. Although these sites are within the general locations identified in Table 5.6, they would need to be brought through the Local Development



Framework process to enable the amendment to the Green Belt boundaries to occur in the first instance. This Green Belt constraint does not apply to the Cleavelands site.

**Table 5.8: Uncertain Housing Sites**

Site	Council Estimate	Welbeck Estimate	Difference	Reason for Difference
Longford	570	370	-200	The ability to deliver 360 dwellings in 2013/2014 with the previous rate being 100 units per annum
Innesworth	73	50	-23	Appeal decision dismissed. Green Belt site. May be some development 2013/2014
Homelands Farm	190	140	-50	Unlikely to achieve 192 completions given development has not yet commenced.
Remainder of North Bishop's Cleeve	210	0	-210	Excluded for the purposes of this calculation
Shurdington	360	50	-310	Dismissed Appeal and a Green Belt site. May be some development 2013/2014.
Brizen Farm	280	50	-230	Dismissed Appeal and a Green Belt site. May be some development 2013/2014.
East Gloucester	150	100	-50	Green Belt site. May be some development 2013/2014.
Brockworth/Hucclecote	1,020	700	-320	Question 220 dwellings per annum suggested.
Mill Lane, Southam	24	0	-24	Understood that there remain issues with the covenant. Not deliverable.
M&G Middle Farm	315	235	-80	The rate of development on a small site is questioned.
65 Cheltenham Road East	14	0	-14	Has not been developed in 7 years
<b>Total</b>			<b>-1,511</b>	



- 5.33 The housing requirement for Tewkesbury Borough is estimated to be at least 683 dwellings per annum. (Table 5.7). However, completions between 2008 and 2009 within the Borough were only 516 dwellings which has resulted in a shortfall of some 167 dwellings when compared to the requirement. This shortfall forward should be carried forward and added to the housing requirement for the next five years which would result in a need for land to accommodate 3,582 dwellings (i.e.  $(683 \times 5) + 167$ ).
- 5.34 Welbeck's own calculation of the housing land supply, using the same categorisation as the AMR, is produced in Table 5.9 based on the housing requirement of 683 dwellings per annum for the period 2008 to 2026 (Table 5.7).

**Table 5.9: Housing Position April 2009**

Housing Requirement 2008-2009	683
Completions 2008-2009	516
Shortfall	167
Housing Requirement 2009-2014	3,415
<b>Total Five Year Requirement</b>	<b>3,582</b>
Dwellings on Allocated Sites with planning permission	1,092
Dwellings on Allocated Sites without planning permission	130
Dwellings on Unallocated Sites with planning permission	883
Other Deliverable Dwellings	322
<b>Five Year Supply</b>	<b>2,427</b>
<b>Surplus/Shortfall Against Requirement</b>	<b>-1,155</b>

- 5.35 Accordingly, it is concluded that there is a five year housing land shortfall of 1,155 dwellings when compared to the requirement (i.e. a 1.6 year shortfall based on 716 dwellings being required per annum over the five year period (i.e.  $3,582 \div 5$ ))
- 5.36 Based on Tables 5.8 and 5.9, Welbeck has adapted the housing trajectory for the five year period 2009 to 2014 included at Appendix B of the AMR.

**Table 5.10: Housing Trajectory**

	2009/10	2009/11	2011/12	2012/13	2013/14
Average Requirement	716	716	716	716	716
AMR Trajectory	435	569	659	960	1,366
Welbeck Trajectory	435	451	395	520	626



### Alternative Supply Calculation SWP and the Proposed Changes

- 5.37 Although revoked, the SWP Proposed Changes represent the most up to date published housing land target for Tewkesbury which has a 'shelf life' beyond the 2011 end dates of the Structure and Local Plan. The SWP Proposed Changes induced a housing target for Tewkesbury Borough of 730 dwellings per annum between 2006 and 2026.
- 5.38 Adopting the same approach as outlined in Table 5.8 but including completions between 2006 and 2009, the housing land supply based on the SWP Option 1 figures and the Proposed Changes is contained in Table 5.2.

**Table 5.11: Housing Position April 2009 Based on the SWP Option 1 Figures**

Housing Requirement 2006-2009	1,593
Completions 2006-2009	1,594
Surplus	1
Housing Requirement 2009-2014	2,655
<b>Total Five Year Requirement</b>	<b>2,654</b>
Dwellings on Allocated Sites with planning permission	1,092
Dwellings on Allocated Sites without planning permission	130
Dwellings on Unallocated Sites with planning permission	883
Other Deliverable Dwellings	322
<b>Five Year Supply</b>	<b>2,427</b>
<b>Surplus/Shortfall Against Requirement</b>	<b>-227</b>

**Table 5.12: Housing Position April 2009 Based on the SWP Proposed Changes**

Housing Requirement 2006-2009	2,190
Completions 2006-2009	1,594
Shortfall	596
Housing Requirement 2009-2014	3,650
<b>Total Five Year Requirement</b>	<b>4,246</b>
Dwellings on Allocated Sites with planning permission	1,092
Dwellings on Allocated Sites without planning permission	130
Dwellings on Unallocated Sites with planning permission	883
Other Deliverable Dwellings	322
<b>Five Year Supply</b>	<b>2,427</b>
<b>Surplus/Shortfall Against Requirement</b>	<b>-1,819</b>

- 5.39 Accordingly, it is concluded that there is a five year housing land shortfall based on the SWP and Proposed Changes housing requirement.



### Alternative Supply Calculation SHMA

5.40 The SHMA indicates that some 618 new households are forecast to be formed per annum within Tewkesbury Borough over a five year period (SHMA Table 9.4) which, allowing for vacancy rates and other adjustments, equates to about 643 dwellings per year for both market and affordable dwellings. Adopting the same approach as outlined in Table 5.9 and including completions between 2006 and 2009, the housing land supply based on the SHMA is indicated in Table 5.11.

**Table 5.13: Housing Position April 2009 Based on the SHMA**

Housing Requirement 2006-2009	1,929
Completions 2006-2009	1,594
Shortfall	335
Housing Requirement 2009-2014	13,120
<b>Total Five Requirement</b>	<b>13,455</b>
Dwellings on Allocated Sites with planning permission	1,092
Dwellings on Allocated Sites without planning permission	130
Dwellings on Unallocated Sites with planning permission	883
Other Deliverable Dwellings	322
<b>Five Year Supply</b>	<b>2,427</b>
<b>Surplus/Shortfall Against Requirement</b>	<b>-11,028</b>

5.41 Accordingly, it is concluded that there is a five year housing land shortfall when compared to the SHMA forecast of new household formation.

### Alternative Supply Calculation Development Plan

5.42 Table 5.14 seeks to test the housing supply against the current annual requirement identified in the Local Plan.

**Table 5.14: Housing Position April 2009 Based on the Local Plan**

Completions Shortfall 1991-2009 (8,910 less 7,738)	1,172
Housing Requirement 2009-2014	2,475
<b>Total Five Requirement</b>	<b>3,647</b>
Dwellings on Allocated Sites with planning permission	1,092
Dwellings on Allocated Sites without planning permission	130
Dwellings on Unallocated Sites with planning permission	883
Other Deliverable Dwellings	322
<b>Five Year Supply</b>	<b>2,427</b>
<b>Surplus/Shortfall Against Requirement</b>	<b>-1,220</b>



- 5.43 Although the development plan period expires in 2011, even when compared the extrapolated annual housing requirement of 495 dwellings per annum, and taking into account the shortfall of housing completions of 1,172 dwellings between 1991 and 2009, there is an inadequate 5 year housing land supply.

### **Conclusion on Housing Land Supply Calculations**

- 5.44 Whichever way the housing supply is calculated as identified in Tables 5.9 to 5.14 there is not a demonstrable five year supply of deliverable sites as required by PPS3 within Tewkesbury Borough. Accordingly, PPS3 requires that planning applications should be considered favourably having regard to the policies in PPS3, including paragraph 69.

### **Strategic Housing Land Availability Assessment**

- 5.45 The site, in various forms, is included In the *Tewkesbury Borough Strategic Housing Land Availability Assessment 2008/2009* (SHLAA – October 2010). Within this document, the site is generally identified as being 'suitable, available and achievable' during the 0-5 and 6-10 year periods.

### **Status of Clevelands**

- 5.46 It is also noted that the most recent housing trajectories in the AMR and NI159 include some dwellings being delivered on the remainder of land North of Bishop's Cleeve in 2011/12 as part of the five year housing land supply. This timescale implies the need for planning permission for this particular development to be granted late 2010/early 2011 to allow for the lead time between the issuing of a planning permission and the first dwellings being available for occupation. The phasing indicated at paragraph 8.3 of this Statement would go some way to addressing the shortfall in the housing provision and fill the gaps in the housing trajectory identified at Table 5.10.
- 5.47 The site does not comprise only part of a potential growth location which has previously been identified. Accordingly, Clevelands is a scheme which can come forward for development without prejudicing any long term planning of a wider area which is not the case with other locations within the Sub Area.



## **Affordable Housing**

- 5.48 A shortfall in housing over the next five years has been demonstrated. However, an element of the housing need comprises affordable housing and it is clear from the SHMA that there is a need to be met through the provision of affordable housing alongside market housing.
- 5.49 The SHMA indicates that there are some 704 households living in unsuitable homes within Tewkesbury Borough which require affordable housing. In addition to this need, of the 618 new households per annum being formed during the next five year period, about 284 (or 46%) of these households potentially requires access to affordable housing. Further, there are about 151 households per annum who can no longer afford their housing costs and become reliant on affordable housing. Cumulatively, taking into account existing need, the gross affordable housing need of a five year period is 2,879 dwellings or 575 dwellings per annum.
- 5.50 The SHMA does also refer to an annual net need for affordable housing need of 130 dwellings per annum. As indicated in the Affordable Housing Statement, Cleavelands would deliver affordable housing at an annual average of up to 38 dwellings per annum over 5 years.

## **Conclusions on Housing Land Position**

- 5.51 Although the Regional Strategy, including the SWP, has been revoked, the housing needs of the Cheltenham, Gloucester and Tewkesbury Sub Area (the CSV excluding Stroud District) during the period up to 2026 remain.
- 5.52 The up to date forecasts and other material demonstrate that there is expected to be a significant increases in the population and number of new households within the Sub Area during the period 2008 to 2026, including within Tewkesbury Borough. There is only a finite capacity to accommodate new dwellings within the main urban areas of Gloucester, Cheltenham and Tewkesbury and larger villages and thus its is inevitable that urban extensions on greenfield land will be required to meet the Sub Area's housing needs.



- 5.53 It is considered that, given the very limited opportunities available for development to occur without significant encroachment into the Green Belt land to the north of Bishop's Cleeve, specifically to the north west of the settlement, has the capacity to accommodate some housing growth and, given the demonstrable need for additional housing land within Tewkesbury Borough to address the 5 year land supply shortfall, Cleavelands would meet part of the housing need without development occurring on Green Belt or other land which ought to be retained in its current use.
- 5.54 Based on Welbeck's analysis, there is a demonstrable five year housing land shortfall and there is a clear need for affordable and market housing to be delivered to ensure there is a supply of housing land to meet the needs of the community. In principle, Welbeck consider that there is a need for Cleavelands to now be granted planning permission to deliver the required dwellings in accordance with national planning advice in PPS3 (Paragraph 71). This is particularly the case where the application scheme is for a sustainable for of development and the Government's recent announcements that there should be a presumption in favour of such proposals.
- 5.55 It should be noted that national planning policy in PPS3 states that applications for housing should not be refused solely on grounds of prematurity. Given the lack of progress with the JCS, the fact that Cleavelands does not form part of a larger area requiring a comprehensive approach, the demonstrable housing need and the lack of credible alternative sites, the granting of planning permission for Cleavelands would not be premature and would not prejudice the emerging JCS.
- 5.56 It is acknowledged that in circumstances where there is a five year housing land shortfall paragraph 69 of PPS3 also requires regard to be had to:
- o Achieving high quality housing.
  - o Ensuring development achieves a good mix of housing reflecting the accommodation requirements of specific groups, in particular, families and older people.
  - o The suitability of the site for housing, including its environmental sustainability.
  - o Using land effectively and efficiently.



- Ensuring the proposed development is in line with planning for housing objectives.

5.57 The following sections of this Statement address these matters.



## 6. Site Considerations

- 6.1 It is not the intention of this Statement to repeat the content of the ES and supporting reports. Accordingly, the Statement seeks to focus on those matters which are of relevance to the development plan policies which are identified in Section 4 and also paragraph 69 of PPS3.

### Ground Conditions and Minerals

- 6.2 A Phase 1 Ground Condition Report indicates that the site is predominantly underlain by the Charmouth Mudstone Formation, described as mudstone with rare limestone nodules and rare thin beds of limestone. The Charmouth Mudstone Formation is underlain by the Blue Lias Formation over the entire site area. A small area of Cheltenham Sand and Gravel is indicated to be present overlying the Charmouth Mudstone within the central part of the eastern site boundary. This occupies an area of approximately 2.9 hectares, the majority of which (1.7 hectares) lies within the boundary of the allotments.
- 6.3 Trial pit investigations have generally confirmed the published geology with topsoil comprising stiff brown slightly sandy clay being encountered to a typical depth of approximately 0.1 metres below ground level (bgl). The topsoil was generally underlain by firm friable orange to yellow brown sandy slightly gravelly clay to a typical depth of approximately 0.6 metres bgl. This was in-turn underlain by stiff closely fissured orange brown mottled clay with variable quantities of sand and limestone gravel to a depth of approximately 1.8 metres. Stiff thinly laminated bluish grey to orange brown mottled clay was generally encountered from 1.8 metres to a maximum proven depth of 2.05 metres. The laminated blue grey clay encountered at the base of the majority of the trial pits can be interpreted as the upper (weathered) horizons of the Charmouth Mudstone Formation. As expected, within the east of the site, a 0.9 metre thick layer of sand and gravel was recorded as underlying the orange brown gravelly clay. This was encountered at a depth of 1.05 metres bgl and is likely to be the small area of Cheltenham Sand and Gravel indicated on the geological maps.
- 6.4 Accordingly, evidence provided by the local geological map and the trial pits excavated at the site confirm that there is a small area of Cheltenham Sand and



Gravel present within the east of the site. The majority of this area of sand and gravel is currently beneath the allotments and would not be affected by any proposed development. The remaining area of approximately 1.1 hectares is within the site and is not considered to be significant, economically viable or of commercial value. The proposed development would not sterilise a viable mineral resource and, as such, would accord with SP Policy M.6.

### **Contamination**

- 6.5 Based on the identified land uses (farmland, farm yard and sewage pumping station) the potential for contamination to be present within the agricultural fields is considered to be very low. The potential for contamination to be present within the vicinity of the agricultural buildings and foul water pumping station is considered to be low to moderate. This assessment takes into account the removal of a small sewage treatment works some time ago and the restoration of the land back to agricultural use.
- 6.6 Based on the identified surrounding land uses, predominantly residential and agricultural, the potential for contamination to be present in the immediate vicinity of the site is considered to be low.
- 6.7 There is an overhead electricity line which traverses the site and some underground services which are primarily related to the foul water pumping station. However, the wayleave for the electricity line expired in October 2010 and there is, in any event, a 'lift and shift' provision. A revised route for this line either underground or, more likely, around any built development could be provided. The size of the site enables the normal limitations imposed by underground services to be readily accommodated as part of the master planning process.

### **Agricultural Land Quality**

- 6.8 The quality of the agricultural land has been assessed to be predominantly grade 3b. This grade is not included within the category of best and most versatile land unlike other agricultural land elsewhere on the periphery of Bishop's Cleeve, such as the gap between the settlement and Gotherington. The land within the Gotherington Gap principally comprises Grades 2 and 3A agricultural land and



national policy in PPS7 states that local planning authorities should seek to use poorer areas of agricultural land in preference to that of higher quality.

- 6.9 Unlike land within the Gotherington Gap, the Cleavelands proposal would accord with the aims of SP Policy NHE.3 and PPS7.

### Hydrology

- 6.10 The flooding maps published by the Environment Agency and those forming part of the *Gloucestershire Level 1 Strategic Flood Risk Assessment (SFRA)* indicate that there are flood zones 2 and 3 immediately adjacent to Dean Brook and, to a lesser extent, Guilders Brook. The vast majority of the site is, however, unaffected by flooding even according to this information.
- 6.11 Welbeck is mindful that flooding is a particular issue within Tewkesbury Borough following the event in July 2007. Accordingly, detailed hydrological modelling has been undertaken of the watercourses and their catchments. This work has been based on the requirements of the Environment Agency using recognised modelling techniques. The modelling exercise undertaken includes extensive sensitivity testing for different scenarios, including a blockage to the railway culvert, and taking into account climate change predictions. Based on these different scenarios, there would only be minor impacts on the flood extents. The work is recorded in the submitted Flood Risk Assessment, together with the associate hydrological modelling, and the ES.
- 6.12 The hydrological modelling exercise has demonstrated that there is some flood risk associated with the watercourses which reflects the existing mapping. However, the majority of the site is outside the 1 in 1,000 year flood extent and, adopting the sequential approach in PPS25, would be capable of development for residential and other uses. The outcome of this modelling work has been accepted by the Environment Agency. Accordingly, the development of the site would comply with LP Policy EVT5, SP Policy F.1 and PPS25.
- 6.13 As an integral part of the Cleavelands scheme, there is the opportunity to improve the storage capacity of the floodplain which would improve the situation downstream.



6.14 Soakaway tests have also been undertaken on the site. These tests demonstrate that the use of infiltration drainage techniques, such as soakaways, would be inappropriate because of the geology of the site. The geology of the site would account for the standing water which has been observed and is unrelated to any fluvial flooding event. Alternative sustainable urban drainage techniques would be adopted including the use of swales and wet and dry detention features with controlled discharges to the watercourses. The wet features would provide scope for improvements to the ecology of the site.

### **Natural Assets**

6.15 A Phase 1 ecological assessment together with species surveys and an assessment of the existing trees have been undertaken to determine whether there are any protected species or other matters which would preclude development. The results of this work indicate that there is one known location of a protected species, a badger sett, within the floodplain to the north east of the site but this would not be directly affected by any built development. There are no ponds within the site. The required surveys of the ponds within 500 metres of the site have confirmed they are not suitable for Great Crested Newts. No evidence of dormice, water vole, otter or white clawed crayfish has been identified associated with the watercourses.

6.16 The ecological survey and assessment of the trees indicate seven trees could have the potential for bat roosting. However, these trees are not proposed to be directly affected by Cleavelands and would be retained as part of the landscape framework. The buildings are unsuited for use as bat roosts and no evidence was observed of this activity.

6.17 The results of the Phase 1 ecological assessment were provided to Natural England who accepted its contents and conclusions.

6.18 The hedgerows within the site have low conservation value due to the absence of a variety of native species. Three hedgerows are considered important under the REGS methodology but by reason of their ditches and tree content rather than the hedgerow itself. The hedgerows and related features could be retained.



- 6.19 Overall, the trees within the site have been assessed to be of low arborticultural quality with an absence of high quality species. Some 22 of the 64 individual trees, groups of trees and woodland blocks have been assessed as being with categories A and B, including seven potential examples of veteran trees. These trees should be retained. There is the remnant of a former pear orchard within the site but these trees are in the late stages of maturity with some exhibiting major die back. A new community orchard would be provided as part of the landscaping proposals to replace these trees.
- 6.20 Further details on ecological matters are included in the ES and based on the information provided, the proposed development would accord with the aims of SP Policy NHE.2 and PPS9 concerning protected species and the protection and enhancement of biodiversity. There would be further enhancements by reason of the proposed additional biodiversity areas.

### **Countryside and Landscape**

- 6.21 The proposed development would be outside the built-up area and encroach into the land which currently forms part of the countryside adjoining Bishop's Cleeve. As such, there would be a conflict with SP Policy S.4 and LP Policy HOU4. However, this conflict needs to be considered against the context of the need for additional residential development being required on a deliverable site to satisfy the housing need. Further, the Cleavelands proposal would not comprise sporadic development within the countryside but would be a well planned and sustainable urban extension to Bishop's Cleeve.
- 6.22 Clearly, any built forms of development on the site would affect the existing views, including from the Cotswolds AONB and the Special Landscape Area to the north. A detailed landscape and visual assessment forms a technical appendix to the ES and the mitigation proposals are also identified. This assessment seeks to quantify the impact of the proposed development on the landscape. It is considered that the Cleavelands proposal has the least impact on the landscape setting of the Bishop's Cleeve and the surrounding countryside when compared to other directions for growth, including the Gotherington Gap.
- 6.23 By reason of being outside the settlement of Bishop's Cleeve and involving land currently identified as being open countryside, Cleavelands would not fully



comply with LP Policies LND4 and SP Policies S.6 and NHE.1. However, any lack of compliance needs to be balanced alongside the advantages associated with the proposal, especially such matters as meeting the demonstrable housing needs and according with the aims of other development plan policies.

### **Heritage Assets**

- 6.24 A Desk Based Archaeological Assessment, with a site walkover, indicated the potential for archaeological sites or deposits to be present within the site. Following discussions with the Senior Archaeological Officer at Gloucestershire County Council, a programme of archaeological evaluation comprising a geophysical survey followed by trial trenching was undertaken. This work was undertaken in accordance with a written scheme of investigation approved by the Senior Archaeological Officer.
- 6.25 The investigations recorded the presence of Roman activity comprising the foundations of a granary and a drying oven. Limited prehistoric activity was also identified adjacent to the Roman activity. The archaeological deposits and features were confined to the southwest corner of the site and a small area along the southern boundary. These finds are considered of local significance, but their location on the fringes of the site provides the opportunity to preserve them in situ.
- 6.26 During the construction works, it would be appropriate for a 'watching brief' approach to be adopted to ensure that any archaeological finds are properly recorded. An appropriate condition could be imposed.
- 6.27 Further information is contained in the ES and demonstrates that the proposed development would accord with SP Policy NHE.6 and PPS5.

### **Accessibility**

- 6.28 The accessibility of the southern part of the site has previously been assessed by the County Council's Accession Model as falling within Rank C. As recognised by the Borough Council, this assessment is flawed for sites outwith the main settlements and also does not take into account the nature of any proposed development. It is noted by Welbeck that an alternative approach to assessing



the accessibility of sites will be adopted by the Borough Council. The following is an overview of the site's and Cleavelands' accessibility.

- 6.29 To the east of the site there are already segregated footpaths and cycle links towards the centre of Bishop's Cleeve some 800 metres distant. Scope exists for connections to be made to these existing routes to promote walking and cycling. However, incentives could be provided, such as free or communal bicycles, secure cycle parking and changing facilities, to promote cycling.
- 6.30 A 15 minute frequency bus service (service D) operates to the south east of the site and provides access to the centre and other parts of Bishop's Cleeve and to Cheltenham. The bus stops are readily accessible from the eastern part of the site. Less frequent bus services operate along the A435 including service number 43 which provides access to Tewkesbury. Scope exists to improve the bus services.
- 6.31 As with any other site at Bishop's Cleeve, the closest railway stations are Cheltenham or Ashchurch.

### **Availability of Facilities**

- 6.32 LP Policy HOU2 identifies Bishop's Cleeve as a location for housing development albeit within the existing built-up area. Bishop's Cleeve is possesses a wide range of facilities including:
- o Two primary schools plus a further school at Woodmancote.
  - o A secondary school with leisure facilities.
  - o Private nurseries.
  - o Extensive outdoor playing facilities.
  - o Employment including at Malvern View and Cleeve Business Parks, Zurich/Capita at The Grange, GE Aviation and within the centre.
  - o A range of shops within and adjacent to the centre including Tesco and Lidl supermarkets.
  - o Petrol filling station.
  - o Healthcare facilities including doctors and dentists.
  - o Community halls, including the Parish Council's offices.
  - o Churches.
  - o Public Houses.



- Police station.

6.33 These facilities are capable of meeting the day-to-day needs of the community with a high proportion being readily accessible to the site by walking, cycling and public transport. The accessibility of Cleavelands to these and other facilities could be enhanced though on-site provision and improved links. Higher order facilities are available at Cheltenham and Tewkesbury which can already be readily accessed by existing public transport which would be improved.



## 7. The Proposal in Detail

### Sustainability

- 7.1 Delivering a sustainable form of development has underpinned the master planning and the Cleavelands proposal in general. Throughout the evolution of the proposal the sustainability and the quality of the design have been the key issues influencing the illustrative master plan. Further, as explained in paragraphs 2.10 to 2.12 of this Statement and the DAS, the master planning process has sought to adopt a holistic approach by considering Cleavelands and the adjacent residential development as a neighbourhood and providing a focal area for the community and local facilities.
- 7.2 A separate Sustainability Statement accompanies the application and compares the Cleavelands proposal against the SWRDA Sustainability Checklist and the Borough Council's Sustainable Community Strategy. The preparation of this Statement was an integral part of and influenced the master planning process.
- 7.3 The sustainability measures which would form part of the Cleavelands proposal include the following:
- o Place making at the heart of the master planning approach with a safe and secure environment for the community.
  - o Mixed used scheme with internalisation of trips.
  - o Range of house types including affordable and retirement units to meet a cross section of the community's housing needs.
  - o Lifetime and flexible homes.
  - o Active promotion of non car modes of travel via travel plans.
  - o Frequent bus services with stops within 200 metres from all dwellings as the aim.
  - o Concepts such as car clubs and car sharing.
  - o Promotion of home deliveries.
  - o Charging points for electric vehicles.
  - o Creation of new job opportunities and potential for live work units.
  - o New facilities which will also be available to the wider community to create a neighbourhood.



- Achieving level 4 of the Code for Sustainable Homes with low water consumption and other related initiatives.
- BREEAM very good for commercial and community buildings
- Encouragement for local businesses to establish and expand within an environmentally friendly environment.
- Adoption of on-site renewable energy generation.
- Layouts to maximise solar gain and the creation of appropriate microclimates, including urban cooling.
- Comprehensive open space provision, retention of hedges and trees, and enhancements to the eco systems, including native species being planted.
- Provision of additional allotments and related facilities.
- Retention of historic assets in situ.
- Betterment of the floodplain.
- Availability of broadband and other telecommunication services.
- Minimal external lighting.
- Retention of soils on site and the use of local materials during construction.
- Engaging the community to manage their own place.

### **Renewable Energy**

- 7.4 At this stage, the preference is for the adoption of micro generation techniques for renewable energy which could include micro gas and biomass CHP, solar thermal, pv and ground and air source heat pumps. Further information about these energy sources is included in the Energy Strategy. More detailed proposals are currently being formulated to reflect these principal opportunities as part of the reserved matters but the intention is to ensure that Cleavelands is an energy efficient form of development to comply with SP Policy EN.1 and LP Policy GNL8.

### **Design and Quality**

- 7.5 As required by LP Policy GNL2 a DAS has been prepared which, together with the illustrative master plan and the parameters plan, demonstrates how, as a matter of principle, the Cleavelands proposal could deliver a high quality form of development whilst maintaining and enhancing the quality of the environment (SP Policy S.7).



7.6 Clearly, more detailed design work is still required as part of the reserved matters. However, to ensure that the quality of development indicated in the DAS and other supporting material, Welbeck expect that conditions would be imposed on any outline planning permission linking the reserved matters to the DAS, illustrative master plan and the parameters plan. Further, conditions which ought to be imposed include requiring a palette of materials to be agreed with the Council and that a Design Code for each phase of the development will be submitted and approved by the Council before any reserved matters are submitted.

### **Security Against the Fear of Crime**

7.7 Respecting the requirements of LP Policy GNL8, during the master planning process regard has been had, as far as is reasonably possible for an outline application, to reduce the fear of crime and security. The approaches to addressing these matters are identified in the DAS but further details would form part of the reserved matters, including the benefits of overlooking of the allotments.

### **Implications for Daylight and Sunlight**

7.8 During the master planning process regard has been had, as far as is reasonably possible for an outline application, the implications for daylight and sunlight. The alignment of the roads indicated on the illustrative master plan and generally seeks to ensure that a significant proportion of the proposed dwellings would have either front or rear elevations with principal windows facing generally south and west. This orientation is also beneficial for solar thermal and pv micro generation of renewable energy.

7.9 The height, bulk and massing of the proposed development would not have adverse implications for the adjacent residential properties or the allotments. There would be a need for appropriate assessments to be undertaken as part of the detailed exercises associated with the reserved matters for each phase of the development.



## Density of Development

- 7.10 The density of the proposed residential development would be about 35 dwellings per hectare. This level of density would reflect the location of Clevelands on the urban edge of Bishop's Cleeve and ensure that there is an effective interface with the surrounding countryside rather than the abrupt and harsh edge which currently exists along the A435. This level of density enables greater flexibility within the scheme to incorporate extensive open spaces and adequate parking provision.
- 7.11 The proposed extent of built development and the density of the housing element are affected by a number of environmental factors. These factors include the existence of ecological and archaeological assets, the provision of open space and the introduction of appropriate sustainable urban drainage techniques. Accordingly, it is considered that the proposed density level would provide a balance between making the best use of the land and ensuring that these environmental factors are properly taken into account. Such an approach would comply with SP Policy H.9.

## Housing Mix

- 7.12 In accordance with SP Policy H.8, the proposed development is seeking to provide a mix of housing sizes, types and tenures to meet the needs of the local community for both market and affordable housing. The ability to provide a range of house types and sizes would be facilitated by the proposed density of development. The suggested mix is:
- 5% 1 bed
  - 15% 2 bed
  - 37½% 3 bed
  - 37½% 4 bed
  - 5% 5+ bed
- 7.13 Included within this housing mix would be about 30 dwellings which are suitable for elderly/retired persons. These particular dwellings would be located close to the high street where the shopping, public transport and potentially other



community facilities would be located. This type of housing located close to the high street would accord with LP Policy HOU11.

### **Affordable Housing**

7.14 An Affordable Housing Statement has been submitted with Severn Vale Housing Society being the preferred affordable housing provider. The main issues associated with the affordable housing provision are:

- Up to 35% of the housing provision would be affordable.
- The split of affordable housing would be 50% social rented and 50% intermediate housing.
- The dwelling mix would seek to balance the overall housing mix and the affordable housing needs associated with Bishop's Cleeve.
- The affordable housing would be provided as part of each phase of the development.
- The affordable housing would be provided in groups (probably 10 to 15 units) to facilitate easy management and avoid an over-concentration in one location.
- The appearance and design of the dwellings would reflect the market housing.
- The floorspace of the dwellings would meet the appropriate minimum floor area standards.

7.15 As noted at paragraphs 5.46 to 5.48 of this Statement, there is a demand for affordable housing and the provision at Cleavelands would go some way to meeting this need

7.16 The affordable housing provision would meet SP Policy H.7 and LP Policy HOU13, and the Council's Affordable Housing Supplementary Planning Guidance. The affordable housing would be secured by a Planning Obligation. Further details are provided in the Affordable Housing Statement.

### **Lifetime Homes and Code for Sustainable Homes**

7.17 All the dwellings would be designed and constructed to Lifetime Homes standards and meet the requirements of level 4 of the Code for Sustainable Homes.



## Retail and Employment Uses

- 7.18 The PPS4 Statement and Commercial Report consider retail and employment uses which now form part of the proposed development forms. In addition to the conclusions of the Commercial Report concerning the appropriate uses for the high street, the Cleavelands proposal has also had regard to the locational and other criteria concerning proposed employment and retail development expressed in LP Policies EMP2 and RET4. Further, as previously noted, the master planning has also adopted a holistic approach to provide a focal area with appropriate facilities for this part of Bishop's Cleeve.
- 7.19 The illustrative master plan incorporates a high street which would be the focal point for the commercial uses forming part of the proposed development. The high street is proposed to include 15 Class B1 units (with a floorspace of about 250sq m each spread over 2 floors) for employment purposes and 4 retail units suitable for Class A uses (comprising one convenience store with a gross retail floorspace of 250sq m and 3 units each with 75sq m of gross retail floorspace at ground level. For all the retail units there would be a second floor of a similar floor area (i.e. 475 sq m) for ancillary uses giving a total of floorspace 950sq m). The employment units could also be used for Class D1 purposes if there is demand from, for example, healthcare providers for accommodation. The scale of the employment uses has been guided by the Commercial Report which is based on the likely market for such development at Bishop's Cleeve.
- 7.20 The employment units could create up to about 187 jobs based on an average employment density of 1 employee per 20sq m. At this stage, the businesses which could occupy units are expected to be either start-up or expanding local firms falling within Class B1. These units would comprise flexible space and it could, for example, be combined (whether 2 or more units) to provide a Doctor's surgery, nursery, crèche or other occupier seeking a larger floorspace. The units could also be divided horizontally to provide smaller self contained accommodation. Scope would also exist to further sub divide the units to provide smaller accommodation with, potentially shared services. The units would be constructed to BREEAM very good standard.



- 7.21 In accordance with LP Policy RET4, the retail units are intended to meet the day-to-day retail needs of the future residents and those of the occupiers of near-by dwellings. Some 20 full or part time jobs might be created by the retail units. As demonstrated in the PPS4 Statement, the anticipate turnover of all the retail units based on net floorspace would be exceeded by the likely expenditure available from the residents of Cleavelands. There would be no material affect on the vitality and viability of the existing businesses within and on the edge of the centre of Bishop's Cleeve, including the Lidl and Tesco supermarkets.
- 7.22 In addition, 16 live work units are proposed within the high street. The use of these units could be controlled by means of a suitable condition.

### **Community Facilities**

- 7.23 Welbeck acknowledge that a development of up to 550 dwellings and related commercial uses would have an impact on existing community facilities. Accordingly, and in accordance with, LP Policies GNL11 and GNL15, and SP Policy S.5, the Cleavelands proposal has regard to the availability of existing community facilities and services and whether new facilities would be required.
- 7.24 The provision of a primary school on the site was the preferred approach of Welbeck because, as part of the holistic approach, it would have meet the needs of existing and future residents within this part of Bishop's Cleeve. However, the Education Authority does not support this approach preferring instead a financial contribution to expanding the Grangefield and Woodmancote primary schools and Cleeve School (the secondary school). Such a contribution would be secured by a Planning Obligation.
- 7.25 Welbeck recognised the Primary Care Trust's (PCT) view that an additional General Practitioner is required to meet the medical needs of the growing community at Bishop's Cleeve. At this stage, no formally confirmed interest has been expressed by the two general practices within Bishop's Cleeve to either support a new facility at Cleavelands or establish a satellite operation. Therefore, Welbeck is willing to provide, via the PCT and secured by a Planning Obligation, a contribution towards the provision of additional accommodation at either of the existing practices to accommodate the additional General Practitioner.



- 7.26 However, the Cleavelands scheme can readily accommodate a new healthcare facility within the high street if either of the current practices would like such a facility. There is also the opportunity, within the high street, for a dentist practice facilities to operate from the Cleavelands site and an interest has been expressed.
- 7.27 The Cleavelands proposal incorporates a community facility to meet the day-to-day needs of the future residents and employees. The Woodmancote Scout Group has expressed interest in occupying the proposed community hall together with other local organisations and groups. The hall would be constructed to BREEAM very good standards.
- 7.28 It is envisaged that financial contributions secured by a Planning Obligation would be sought for improvements to other community facilities which, where justified, Welbeck would be willing to consider.

### **Open Space and Green Infrastructure**

- 7.29 A range of open spaces would be provided with different functions including formal children's play areas, formal sports pitches with a changing facility, informal recreation areas, footpath and cycle links, creation of new habitats and a community orchard. The Green Infrastructure would provide a framework for the built development and would be provided by Welbeck.
- 7.30 The Green Infrastructure would promote improvements to the biodiversity of the site (reflecting the aim of LP Policy NCN5) and there would be new tree and hedge planting to reinforce the existing field boundaries and compensate for the possible loss of these features (as required by LP Policy LND 7). Subject to the necessary consents, and in accordance with LP Policy NCN6, scope would also exist to utilise the detention basins and swales to create new habitats alongside the proposed biodiversity area.
- 7.31 The Cleavelands proposal includes an extension to the existing allotments which is intended to both meet the needs of future residents and provide 50 additional plots to satisfy, in part, the current waiting list. Welbeck would be content for the ownership of these allotments to be vested with the Parish Council which would, in some part, meet the aims of the Parish Council's Four Year Plan to



2014. The extension to the allotments would include a new access from Cleavelands which could be used as a replacement for the current vehicular access on to the A435. In addition, the proposal includes an area of car parking (50 cars) and a community composting facility. The total area is 0.7 hectares.

- 7.32 The existing rights of way which traverse the site would be retained within green corridors. New footpaths and cycleways would be created within the development to promote recreational pursuits such as dog walking, cycling and jogging. In combination, these works would improve access to the countryside for the existing community and future residents. There would also be improvements to off-site links towards the centre of Bishop's Cleeve.
- 7.33 The open space and associated recreation proposals would generally accord with the requirements of LP Policies RCN1 and RNC2, and SP Policies RE.2, RE.3 and NCE.2.

### **Access and Transport**

- 7.34 As required by LP Policy TPT1 and SP Policy SP.1, the proposed development adopts a sequential approach with the emphasis being placed on proposals which promote walking, cycling and use of public transport as the preferred mode of travel. However, there will inevitably be trips by private vehicles and these matters are addressed in more details in the Transport Assessment Report (TA) and the associated Framework Travel Plan (FTP).
- 7.35 Walking and cycling within the proposed development would be promoted by a range of measures including new footways and cycleways to provide safe and direct links to key destinations and the design of the road network favouring these modes (SP Policies T.2 and T.3). Outside the site, an appropriate contribution would be made to enhance the existing routes to provide easier access to the centre of Bishop's Cleeve and other destinations, especially Cheltenham. This initiative reflects the aims of LP Policy TPT5 and SP Policy T.3.
- 7.36 Reflecting the aims of SP Policy T.5, the TA and FTP explain in more detail the proposals for public transport to serve the site and the nature and siting of appropriate bus stops. The use of free bus passes and the nature of the bus



service would seek to encourage future residents to use public transport rather than the private car, particular for trips to Cheltenham.

- 7.37 Although Welbeck would be willing to support a bus service that would principally link the site to the wider area of Bishop's Cleeve (and Cheltenham at peak hours), the preferred strategy for public transport is a fundamental reassessment of bus services. The intention would be to reconfigure the existing services to improve their routing and timing, including the potential for the D service to operate in clockwise and anti-clockwise directions, which would provide greater opportunities for access by public transport whether by the existing community or the future residents and employees of Cleevelands. Such an approach would accord with SP Policy T.5 and other strategic policies.
- 7.38 The access strategy for the site comprises a main vehicular access from the A435 with a secondary access via Little Acorns. The A435 access would be roundabout controlled with appropriate crossing facilities to be incorporated for pedestrians and cyclists. The Little Acorns access is an extension of an existing spur road which does not have frontage development. The TA and ES include details concerning how the proposed development would not impair the safety or satisfactory operation of the highway network. There would not be an unacceptable loss of amenity to users of adjacent land (LP Policy TPT1) by reason of the noise and emissions of the generated traffic (see paragraphs 7.41 to 7.47 of this Statement).
- 7.39 In accordance with agreed standards, secure on-plot cycle parking would be provided for each dwelling and the commercial and community uses (LP Policy TPT6). An average of 2 car parking spaces per dwelling, together with some on-street parking for visitors, would be provided. This level of parking is considered appropriate reflecting the mix of the proposed dwellings, the function of the development, the aim of promoting non car modes of travel and the desire for the Cleevelands proposal not to incorporate extensive areas of parking courts which can be a focus for crime and anti social behaviour. The parking for the commercial and community uses would meet any adopted standards in accordance with SP Policies T.8 and T.9.



7.40 No significant upgrades to the strategic transport infrastructure would be required. However, as explained in the TA and FTP and in addition to the specific proposals to promote non car modes of travel, Welbeck would be prepared to provide appropriate and justified contributions secured by a Planning Obligation towards off-site transportation improvements, including works along the corridor between Bishop's Cleeve and Cheltenham (Policy TPT 9).

### **Noise and Air Quality**

7.41 The only noise source within the surrounding area is associated with the traffic movements along the A435. To avoid the necessity for acoustic screening similar to Deans Lea, the residential development has been set back from the edge of the carriageway to ensure that the dwellings fall within noise exposure category B as identified in PPG24. Acoustic double glazing with trickle vents would be sufficient to attenuate the road traffic noise from the A435 for habitable room windows facing towards the road and the main site access.

7.42 Within the proposed development, there would be no noisy uses adjacent to residential properties. Where there might be issues with late night or early morning opening of, for example, a take away or other retail unit, appropriate conditions to limit hours of operation could be imposed. The proposed employment uses fall within Class B1 and can, therefore, be undertaken within predominantly residential areas. Although overlooked, the proposed children's play equipment would possess buffer area to residential development to minimise noise nuisance.

7.43 Off-site, traffic generated by the development would not increase the existing background noise levels at sensitive receptors by more than 3dB(A) which is minimum perceptible under normal conditions (PPG24). Typically, the noise increase would be between 1 and 2dB(A) when compared to the background noise levels, including within the vicinity of the Little Acorns access.

7.44 There are no significant issues associated with air quality from the uses on site. Dependent on the choice of renewable energy, there may be some localised matters to consider at the reserved matters stage but they would not be significant.



- 7.45 There are no Air Quality Management Areas adjacent to the site with the closest at Junction 10 of the M5 motorway. However, there will be emissions from traffic generated by the development but, even taking into account existing levels, the annual mean NO<sub>2</sub> and PM<sub>10</sub> levels would remain below the recognised objective of 40 µg/m<sup>3</sup>.
- 7.46 Noise and air quality issues during in the construction process can be addressed by appropriate conditions including the submission and implementation of a construction method statement incorporating of the codes of best practice.
- 7.47 The insignificant effects of noise and air quality would enable Cleavelands to accord with LP Policy EVT2, SP Policy P.1 and national policy in PPS23 and PPG24.

### **Utilities**

- 7.48 A Utilities Capacity Assessment has been prepared. Enquiries made with service providers indicate that there are no insurmountable issues associated with telecommunications, water, foul water drainage, electricity and gas. The information on these matters is contained in the Assessment. Some off-site reinforcement works and on-site provision such as electricity sub stations would be required but these would be expected for a scheme of the size of Cleavelands. The existing foul water pumping station would be retained and incorporated into the high street. There would be no conflict with LP Policy GNL11 and SP Policy W.1.
- 7.49 One option being considered is whether there should be a shared satellite dish for groups of dwellings rather than separate dishes being erected on each property. These dishes would be in addition to any high quality broadband connections provided as part of the services to each property.

### **Surface Water**

- 7.50 As demonstrated in the FRA and taking into account the site's geology, the surface water strategy would include landscaped detention features and swales to ensure that Cleavelands would be an integral part of a sustainable drainage system required by LP Policy EVT9. The proposed strategy would at least



replicate the existing greenfield conditions without detriment to current flows within the watercourses and provide the opportunity to enhance the biodiversity of the site. Further details are included in the ES and the FRA as appropriate.

### **Waste**

- 7.51 The philosophy of re-use, recycling and waste minimisation would underpin the waste strategy for both the construction and operation of Cleavelands. The retention and re-use of soils for landscaping and raising the slab levels of buildings would be pursued; provision of recycling facilities for all residential and commercial units, and a communal composting facility linked to the allotments are amongst the approaches which would be adopted. A separate Waste Minimisation Statement has been prepared and accompanies the application which reflects the approach outlined in the Gloucestershire Waste Core Strategy Preferred Options and the Gloucestershire Supplementary Planning Document Waste Minimisation in Development Projects.
- 7.52 Space would be provided for refuse and recycling facilities whether on an individual basis for houses or communal basis for apartments, commercial and community buildings. The opportunity would exist for other communal recycling facilities to be provided particularly within the high street. Bins for dog excrement would be provided within the open spaces.

### **Contamination, Pollution and Construction**

- 7.53 The contamination potential of the existing site has already been addressed at paragraphs 6.5 to 6.7 of this Statement. The range of uses which form part of the Cleavelands proposal would not normally be expected to give rise to any risk of contamination once operational.
- 7.54 It is recognised, however, that there might be scope for pollution incidents to occur during the construction process. Therefore, in addition to the principle of a construction method statement, the ES identifies specific proposals for the protection of watercourses, landscape and ecology during the construction process. Appropriate conditions could be imposed on any planning permission for the necessary details to be submitted for approval.



- 7.55 The ES specifically addresses matters of potential light pollution at night time and identifies specific measures which would mitigate any potential adverse impacts, including low level and shielded lights. Accordingly, the proposed development would accord with LP Policy EVT3, and SP Policy P.1
- 7.56 Although not often considered, an advantage of this site is that construction would not have an adverse impact on the living conditions of the occupiers of neighbouring properties, such as requiring lorries to use residential or narrow rural roads for access. Access for construction traffic would be solely from the A435 albeit there may be a need to allow some construction to access the site via Hayfield Way when the secondary access is being constructed which would involve the erection of a structure across Guilders Brook.

### **Future Management**

- 7.57 Welbeck's intention is to establish a company with the aim of ensuring future residents and business share in the day-to-day management of their community. The company would be able to raise a precept to assist with its management function.
- 7.58 In circumstances where, for example, the open space is not accepted for adoption by either the Borough or District Council, the responsibility for this function would reside with the company. As with any normal adoption arrangement, Welbeck would make an appropriate financial contribution towards the future management of the open space.

### **Conclusion**

- 7.59 Cleavelands would satisfy the criteria identified at paragraph 69 of PPS3:
- High quality housing would be delivered.
  - A good mix of housing reflecting the accommodation requirements of specific groups, in particular, families and older people would be provided.
  - The site has been demonstrated to be suitable for housing and the proposed development would be environmental sustainable.
  - Land would be used effectively and efficiently taking into account the environmental and other circumstances of the site.



- The proposed development is in line with planning for housing objectives whether at national or local level, especially the delivery of affordable units and homes for retired people.

7.60 There are no insurmountable physical, technical or environmental reasons why proposed development could not be undertaken.



## 8. Delivery, Planning Obligation and Conditions

### Delivery

- 8.1 Welbeck has considerable experience of delivering major developments throughout the country and the Cleavelands proposal would be deliverable. Welbeck would be responsible for the overall delivery of Cleavelands. Welbeck would directly secure the provision of all physical and green infrastructure, the high street and other the community facilities.
- 8.2 The individual dwellings would be constructed by other parties which are expected to be local, regional or national housebuilders. To ensure the delivery of a high quality form of development, in addition to any planning conditions and design codes, Welbeck will impose its own contractual controls and covenants to ensure that the vision identified and explained in the DAS and the other matters referred to in all the various supporting documents are delivered.
- 8.3 The current assumption is that, following planning permission, a likely start date for construction on site would be mid 2011, with the first dwellings available for occupation in late 2011/early 2012. The expectation is that construction would be complete no later than 2016.
- 8.4 The expected phasing, based on the release of land utilising the blocks identified on the master plan is identified in Table 8.1 and a more detailed draft phasing programme is included as part of this Statement. Although slightly different to the TA, the traffic generation adopting this indicative phasing would not be materially at variance with the TA's conclusions.
- 8.5 Although a timescale for the delivery of new homes, including affordable housing, can be suggested, the actual occupancy of the commercial and live work units would be dependent on market conditions and demand



**Table 8.1: Indicative Phasing (See DAS Figure 32)**

Phase	Likely Development Provided
1	<ul style="list-style-type: none"> <li>○ Main and secondary accesses which would enable bus access through the site</li> <li>○ Between 65 and 70 dwellings</li> <li>○ The high street</li> <li>○ A locally equipped area for play (LEAP)</li> <li>○ The Central Open Space – The Community Green</li> <li>○ The sustainable drainage system</li> <li>○ Allotment extension</li> </ul>
2	<ul style="list-style-type: none"> <li>○ Between 95 and 100 dwellings</li> <li>○ The 30 retirement units</li> <li>○ A LEAP</li> <li>○ Main Open Space/Sports Pitches including changing rooms</li> <li>○ The Community Facility including hall</li> </ul>
3	<ul style="list-style-type: none"> <li>○ Between 135-140 dwellings</li> <li>○ An initial loop road through the site</li> <li>○ Sections of Greenways</li> <li>○ A LEAP</li> </ul>
4	<ul style="list-style-type: none"> <li>○ Between 140 and 145 dwellings</li> <li>○ Final loop through the site</li> <li>○ Sections of Greenways and Deans Meadow</li> </ul>
5	<ul style="list-style-type: none"> <li>○ Between 75 and 80 dwellings</li> <li>○ Remaining Greenways</li> </ul>

8.6 The site is controlled by Welbeck via a promotion agreement and possesses no legal, physical, technical or environmental constraints. Accordingly, subject to securing reserved matters and other related approvals, the site is immediately available for development. Indeed, construction work could commence relatively quickly because there is already access to the site from the A435 for establishment and mobilisation purposes. This is an important issue because of the need for additional dwellings to meet the shortfall in the supply of housing land.

**Viability**

8.7 On behalf of Welbeck, an exercise has been undertaken based on the illustrative master plan, the matters identified in the various document supporting the planning application and the indicative phasing programme to ensure that the Cleavelands proposal is financially viable in the event planning permission is granted. Based on the level of affordable housing proposed, the likely requirements of a Planning Obligation and the infrastructure costs associated



with the site, it has been established that Cleavelands would be a viable and deliverable scheme.

### Planning Obligation

8.8 A Draft Heads of Terms document for a Planning Obligation has been prepared and accompanies the application. At this stage, the identified heads of terms for an Obligation include:

- Affordable Housing.
- Education Contribution.
- Healthcare Contribution.
- Contribution to off-site transportation works.
- Bus subsidy and other matter identified in the FTP requiring financial contributions.
- Long term management of the Green Infrastructure including the transfer of the allotment extension.
- Provision of play equipment and the provision of changing facility for the sports pitches.
- Delivery of the community hall.
- Establishment of a management organisation.
- Those matters in the ES which cannot be secured by condition.

8.9 Although there will be general conditions imposed on any planning permission, there would be specific conditions relating to the proposed development and these have been identified in this Statement. These conditions should include:

- Link between illustrative master plan, the DAS master plan, the parameters plan and reserved matters.
- Materials pallet.
- Design Code for each phase of development.
- Details of 10% renewable energy on-site.
- Code level 4 dwellings and Lifetime Homes.
- BREEAM very good for the commercial and community buildings.
- Limitations on the retail floorspace.
- Controlling the hours of opening of any retail unit.
- Controlling the occupancy of the live/work units.
- Watching brief for archaeology.
- Construction method and related statements.



- Details to prevent pollution incidents during the construction phase.
- The provision of appropriate refuse, recycling and dog excrement bins.

8.10 Detailed discussions with the Borough Council and other relevant agencies would be welcomed to clarify the initial views of Welbeck concerning the potential content of the Planning Obligation and any further conditions which might be required for an outline planning application.



## 9. Conclusions

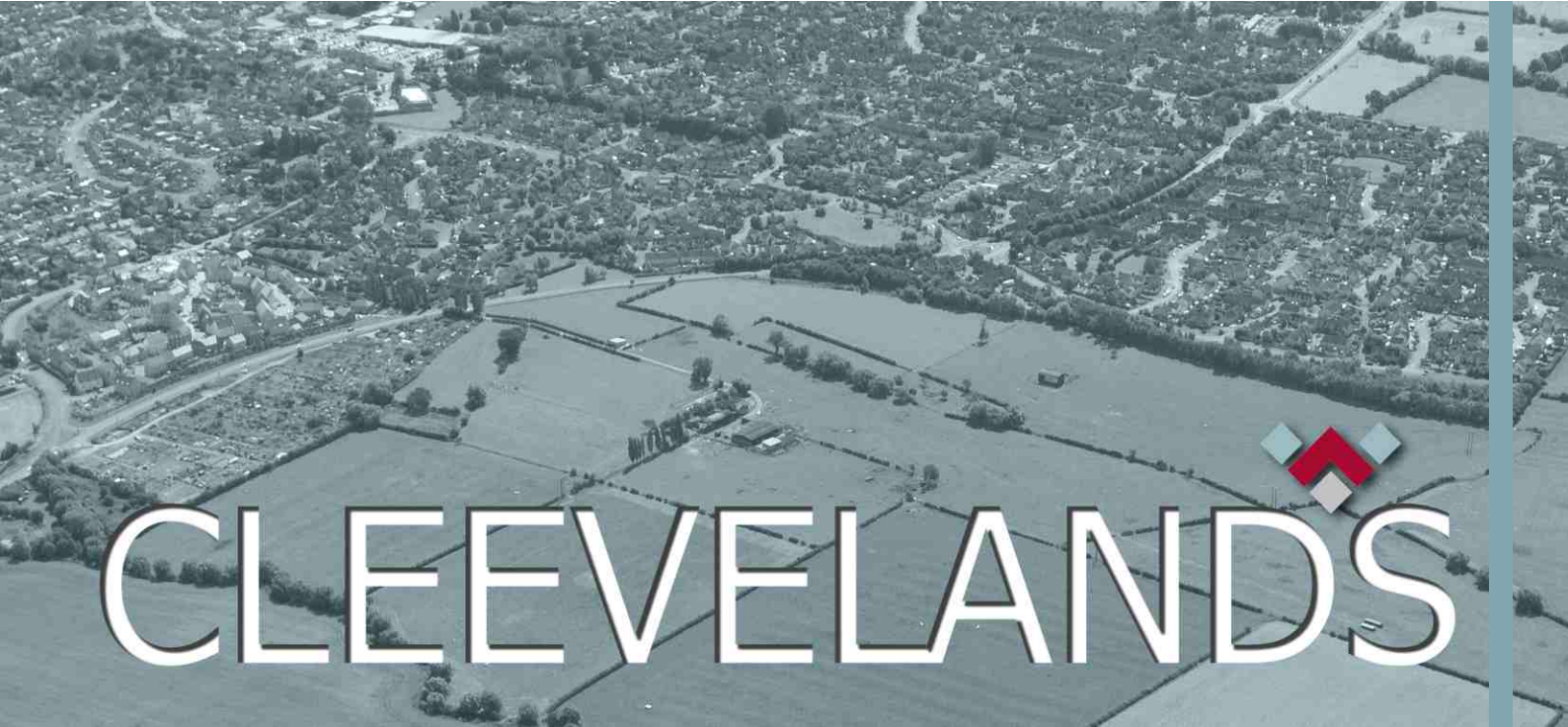
9.1 By reason of not being allocated for development and situated outside the urban area of Bishop's Cleeve, the proposed development would be contrary to these aspects of the development plan. However, in addition to the compliance with a range of other policies as demonstrated in this Statement and the other supporting documents, there are other material considerations which should be weighed in the balance in support of the grant of planning permission:

- As required by PPS3, an up to date 5 year supply of deliverable sites cannot be demonstrated and this application should be considered favourably.
- The application satisfies the criteria identified at paragraph 69 of PPS3.
- PPS3 refers to planning applications for housing not being refused solely on grounds of prematurity and this scheme would not prejudice the long term planning of a larger area.
- Bishop's Cleeve is an appropriate settlement to accept additional growth. This has been recognised by the Structure Plan (part of the CSV) and now revoked SWP Proposed Changes (Cheltenham and Gloucester Sub Area).
- Cleavelands is viable and can be delivered in an expedient manner to meet the identified market and affordable housing needs of Tewkesbury Borough and the wider Sub Area.
- The development of the site would meet national housing and planning policy objectives.
- The site is not affected or constrained by national or local environmental or adverse policy designations which preclude development.
- There are no insurmountable technical objections which would preclude the Cleavelands proposal.
- The proposed development would not have any significant impacts which could not be appropriately mitigated.
- The design of Cleavelands would be capable of meeting national and local planning policy aspirations and best practice.
- A sustainable form of development would be delivered and there is an emerging presumption in favour of such forms of development.



9.2 In summary, the Cleavelands proposal would seek to be a high quality and sustainable form of development capable of meeting a significant proportion of the policy requirements of the development plan and national planning policies. Where there are any potential conflicts with the development plan policies they need to be balanced against the advantages of Cleavelands, including meeting a demonstrable housing requirement. Accordingly and on balance, this application should be approved.

File: 0051/Cleavelands  
Version 1.06  
28 October 2010



# CLEVELANDS



WELBECK STRATEGIC LAND