

## **Note for Inspector**

### **Gypsy, Traveller and Travelling Showpeople site searches in Gloucester City June 2021**

#### **1.0 Introduction**

- 1.1 This note has been prepared for the Inspector examining the Gloucester City Plan (GCP). It explains the activity the City Council has undertaken to seek to identify deliverable sites for Gypsy, Traveller and Travelling Showpeople accommodation needs arising from the city. It supplements Submission Document HOU005 'Gypsy, Traveller and Travelling Showpeople Position Update' and the City Council's answers to questions 72 – 75 under Matter 8 'Size, type and tenure of housing'.
- 1.2 The Gloucestershire Gypsy and Traveller Accommodation Assessment (GTAA, 2017) (Submission Document HOU004) sets out the evidence on needs up to 2031 for Gloucester. These are two pitches for Gypsies/Travellers and 16 Travelling Showpeople plots. The City Council's response to Matter 8, Question 72 provides more information with regards to the timeframe for the delivery of these needs and their status against the planning definition contained in Planning Policy for Traveller Sites (August 2015).

#### **2.0 Sites searches**

- 2.1 To date, three 'call for sites' have been undertaken that have included Gloucester City. The first was in 2011 and undertaken in partnership with the Joint Core Strategy authorities; Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council. The second was undertaken in 2015 in partnership with all Gloucestershire local authorities. More recently, a call for sites was undertaken by Gloucester City Council, alongside the Draft Gloucester City Plan consultation (see Section 4.0 for further information). The call for sites were supported measures to raise awareness amongst the development industry and bodies representing the communities, such as press releases, articles in relevant publications and direct notifications. Information and submission forms were made available on relevant websites (district authorities, county council).
- 2.2 Notwithstanding the call for sites, it is important to note that the City Council will always accept the submission of sites for consideration. It is just that in the case of the specific call for sites discussed above, a targeted approach was taken in order to generate as much activity as possible.
- 2.3 Submitted sites were assessed against a policy neutral approach, in that existing planning policy was not used to inform the assessment of suitability, but instead focussed on the existence of physical constraint or evidence. This meant for example that local landscape designations or Green Belt were not considered (though the latter isn't relevant to Gloucester). The assessment criteria were agreed between the JCS authorities and align with the principles of Policy SD13.
- 2.4 In total, 9 sites have been submitted for consideration within Gloucester City and the results were published as an addendum to the SALA reports. The results are summarised at Table 1, with fuller details provided at Appendix 1 and a map identifying the location of each of the sites is provided at Appendix 2. Please note the reference numbers do not follow sequentially as the analysis included sites submitted on the other JCS authorities, which have been excluded for the purposes of this note.

Ref	Site	Suitable	Available
GTSUB01	40 Sims Lane	No	Yes
GTSUB02	Former Town Ham Allotments	Unknown	Yes
GTSUB03	Port Ham Sidings	No	No
GTSUB04	Land adjacent to Hempsted Recycling Centre	No	No
GTSUB05	Land at Hempsted Meadows	No	No
GTSUB06	Land off South West Bypass	No	No
GTSUB17	Land adjacent to Riverside Health and Fitness Club	No	No
GTSUB18	Land to south of A417	No	No
GTSUB20	Land off Naas Lane, East of Waterwells Business Park	Yes	No

**Table 1: Sites submitted to call for sites for Gypsies, Travellers and Travelling Showpeople in Gloucester City**

- 2.5 The assessments demonstrated that most sites are unsuitable because of the presence in insurmountable constraints, such as presence within Flood Zone 3A or 3B, or on private land that isn't available. On this basis, most were discounted and not subject to any further investigation. However, the City Council considered appropriate to undertake further analysis of GTSUB02 'Former Town Ham Allotments' to confirm if the site is suitable and viability (see sections 3 and 4 below for further information).
- 2.6 In addition to the above, the City Council considered whether any opportunities exist within its land ownerships. All current development opportunities owned by Gloucester City Council are allocated in the GCP, these being SA04 'Former Wessex House', SA08 'King's Quarter', SA10 'Former Fleece Hotel and Longsmith Street Car Park' and SA11 'Land rear of St Oswalds Retail Park'. The first three are regeneration opportunities located within, or in very close proximity to the city centre and are not suitable for Gypsy, Traveller or Travelling Showpeople use. Furthermore, they feature in the Council's adopted Regeneration and Economic Development Strategy (Submission Document OTH003) under Objective 1 'Delivering major development sites', bullets (i) King's Quarter, (ii) Blackfriars Project (incorporating the former Fleece Hotel) and (v) Railway Corridor (incorporating the 'linked corridor sites').
- 2.7 The latter site, Land rear of St Oswalds, is subject to two ownerships (a third option was recently removed). Given its sustainable location in close proximity to the city centre, the City Council and Tesco have been working towards the delivery of a high-density residential development of approximately 300 new homes, plus the provision of open space to provide for an identified shortfall in the local area. The Inspector has been provided with a Statement of Common Ground (SoCG9) between Gloucester City Council and Tesco setting out the current position in relation to the site.
- 2.8 Beyond this, the City Council has a Public Open Space Strategy 2014 (Submission Document HW016), Playing Pitch Strategy 2015 – 2025 (Submission Document HW010) and Playing Pitch Strategy 2015 – 2025 Interim Review (Submission Document HW012) that conclude that existing open spaces and playing fields should

be protected from development for alternative uses, be improved and new provision secured through new development.

- 2.9 As mentioned elsewhere, there is a finite supply of land within the administrative area of Gloucester City and the allocations made in the GCP represent the remaining suitable and deliverable urban capacity sites.

### **3.0 Draft Gloucester City Plan 2017**

- 3.1 The Draft GCP identified the Former Town Ham Allotments site as a draft allocation at Policy SA21 for Travelling Showpeople use, subject to further investigations to ascertain its suitability and deliverability. The 'site description and overview' section of the draft policy stated the following:

*'The site is located to the north-west periphery of the city, directly adjacent to existing Travelling Showpeople sites at Pool Meadow and Fairview. The site is owned by the City Council, is well located in terms of access to the road network and fairly close to the city centre. Given the proximity to the existing Travelling Showpeople community and in light of the need identified in the most recent assessment, this site could form a useful extension/addition to existing uses. The City Council is currently undertaking the necessary investigations to determine deliverability.'*

- 3.2 However, the Draft GCP also acknowledged that this was the only site at that time that had the potential to provide for the needs of the Travelling Showpeople community, and that there were none suitable for the Gypsy/Traveller community. On that basis, alongside the consultation, a further 'call for sites' was undertaken, seeking the submission of any other opportunities that exist in the city. This was set out at Section A of the Draft GCP, which stated the following:

#### ***'Gypsies, Travellers and Travelling Showpeople***

*Gloucester has an established traveller community, particularly Travelling Showpeople. National planning policy requires local planning authorities to locally assess the need for new accommodation for the traveller community and to put into place a strategy to provide for those needs within the period that is being planned for.*

*The most recent evidence on housing need for the traveller community is contained within the JCS Gypsy and Traveller Accommodation Assessment (Draft Update Summary), March 2016. This study shows a need in Gloucester for two Gypsy/Traveller pitches and eight Travelling Showpeople plots between 2016 and 2031. This includes both those that travel for the purposes of work (i.e. meet the planning definition of a Gypsies, Travellers and Travelling Showpeople), as well as those that do not. For more information please refer to the document on the City Council's website at [www.gloucester.gov.uk/cityplan](http://www.gloucester.gov.uk/cityplan)*

*The JCS does not deal specifically with site allocations for the traveller community; site allocations therefore need to be included in Local Plans. However, JCS Policy SD14: 'Gypsies, Travellers and Travelling Showpeople' does set out a detailed criteria-based policy which is to be used in the determination of speculative planning applications and in the assessment of potential site allocations.*

*In partnership with other Gloucestershire local planning authorities, the City Council has undertaken a 'call for sites' (on two occasions), where members of the community, developers and landowners were invited to submit sites they consider could be suitable for residential Gypsy, Traveller or Travelling Showpeople use. These processes yielded several sites that were assessed. However only one site has been identified as having potential for Travelling Showpeople. This site is known as the 'Former Town Ham Allotments' and is identified as a proposed site allocation in the Draft GCP (Site reference SA21). It is considered appropriate to allocate this site for this specific community because it is located directly adjacent to the existing and long-established Travelling Showpeople community off Westend Parade to the north west of the City. However, the site is significantly constrained in terms of land stability, land contamination and the presence of a high-pressure gas main. At the time of writing the City Council is undertaking the necessary background research to establish if it is deliverable. If the site is found to be deliverable then it will be allocated for Travelling Showpeople use.*

*At the time of writing there are no other known deliverable site opportunities to provide for the identified Travelling Showpeople or Gypsy / Traveller need. As part of the Draft GCP consultation however the City Council is undertaking further 'call for sites'. With this in mind, if any members of the community, landowners or developers would like to submit a site for assessment this is strongly encouraged.*

*If not enough deliverable sites are identified in the City for the Gypsy / Traveller and Travelling Showpeople community, a formal request will be put to neighbouring authorities under the 'Duty to Cooperate' for assistance in meeting this need.'*

- 3.3 Despite the call for sites, no additional opportunities were submitted for consideration alongside the Draft GCP 2017 to provide for Gypsy, Traveller or Travelling Showpeople needs.

#### **4.0 Former Town Ham Allotments site**

- 4.1 In 2015 officers launched a soft market testing exercise, to understand if there would be interest in progressing the Former Town Ham Allotment site for Travelling Showpeople development. The purpose of the exercise was to allow and enable potentially interested organisations with appropriate expertise, financial capacity and experience to:
1. Outline and generate initial views/ideas around the outcomes, scope and proposed procurement approach.
  2. Engage with the Council to understand its challenges, intentions and desired outcomes.
  3. Enable to the Council to understand how the service requirements could be shaped and delivered.
  4. Explore with the Council funding mechanisms/options of bringing forward the development proposal.
- 4.2 Interest was expressed from a Registered Provider and members of the local Travelling Showpeople community and different options were put forward that would deliver additional residential plots.

- 4.3 Following on from this, Hydrock consultants were appointed by the City Council in 2016/17 to undertake an analysis of the site from a drainage and utilities perspective, and to provide design options with the aim of delivering additional accommodation for the Travelling Showpeople community as an extension to the existing sites.
- 4.4 The analysis identified several headline constraints, including:
1. **High pressure gas pipe:** There is a 300mm high pressure gas pipe running east to west through the site, connecting Gloucester with Uckington to the north. The analysis considered the nature of the pipe (operating pressure, material type and wall thickness) and the subsequent risk to public safety. Based on the advice of the Health and Safety Executive, the analysis established that the presence of the pipe sterilised a large area of the site, it being unsuitable for residential accommodation and/or storage of vehicles and rides.
  2. **Storm water drainage:** The site is not located within proximity to storm water sewers and therefore discharge to a sewer is not feasible. The site is in Flood Zone 2 but surrounded by Flood Zone 3. Any attenuation would need to be provided above Flood Zone 3 level, which would most likely need to take the form of an above ground swale or raised levels with ground cellular storage tank.
  3. **Foul water drainage:** The analysis shows the existence of a foul water drainage to the east of the site. Therefore, a connection to the sewer would require either the construction of a new sewer through the existing adjacent travelling showpeople site or utilising an existing private drain and applying to adopt the existing private drain under a separate S104 agreement.
- 4.5 In addition, the current ground levels are substantially higher than those of the surrounding area, as a result of the historic use as a landfill site. The site would require extensive groundworks and compaction prior to any construction works. It is understood the land is unstable and would likely require additional remedial works, compacting and topsoil as the ground sinks over time. Furthermore, there is known to be significant contamination resulting from the previous use of the site as landfill and access could only be achieved through the existing Travelling Showpeople site, creating a ransom strip and potentially the need for the compulsory purchase of land.
- 4.6 At this point the Registered Provider confirmed no further interest in progressing the site and the City Council concluded the site was not suitable or viable as a development site and not taken further.

## 5.0 Other opportunities and next steps

- 5.1 In progressing this matter, the City Council has and is continuing to seek to identify deliverable sites to provide for needs. Through engagement with the local Travelling Showpeople community, an opportunity has recently emerged in the administrative area of Gloucester City, called 'Spinnaker Park', which officers are exploring. It is located to the north west of the city and is located fairly close to the existing Travelling Showpeople sites at Pool Meadow and Fairview. It has planning permission for employment uses but its location would be suitable for the Travelling Showpeople community, which tends to be a hybrid of residential, storage and workshop uses.
- 5.2 However, there are two primary issues. The first is that it is located within Flood Zone 2 and caravan accommodation is classified as 'more vulnerable'; because of this, officers are currently engaged with the Environment Agency to understand if this constraint could be satisfactorily be overcome.

- 5.3 The second is the land value, in that the asking price is £400,000 per acre to reflect the employment consent and substantially higher than Travelling Showpeople use which, from conversations with a local property agent and members of the Travelling Showpeople community, we understand to be between £60,000 and £100,000 per acre. Because of this, officers have engaged with Homes England to investigate opportunities for funding to address the viability gap and this will be progressed further once the situation regarding flood risk has been confirmed.
- 5.4 The City Council has also engaged with neighbouring authorities in seeking support in identifying suitable and deliverable sites on a cross-boundary basis. These conversations have primarily been undertaken through the Gloucestershire Gypsy and Traveller Project Group and Gloucestershire County Planning Officers Group. Through the Project Group, it was previously confirmed that none of the Gloucestershire authorities had enough sites to provide for assessed pitch/plot need for the traveller community across their local plan periods at that time. Because of this, the six Gloucestershire authorities agreed to work together once again, firstly in updating a new Gloucestershire Gypsy and Traveller Accommodation Assessment, and secondly to progress a Gypsy and Traveller Site Identification Study on a county wide basis (the latter being led by officers at Gloucester City Council).
- 5.5 The Inspector will be aware that to support the GCP Examination, the Gloucestershire District Authorities have signed a Statement of Common Ground, which confirms the following:

*4.1 The parties agree that:*

- 1. Gloucester City has a tightly drawn local authority boundary, with significant planning constraints and limited land supply, and that there are currently no deliverable site opportunities to provide for that need in the administrative area of Gloucester City Council. The City Council will continue to actively investigate opportunities to meet unmet needs within the administrative area, where they arise.*
- 2. In satisfying the Duty to Cooperate, the parties have and will continue to work in partnership and collaborate to identify needs and sites to provide for the Gypsy, Traveller and Travelling Showpeople community, including on a cross-boundary basis where justified and where it represents the most sustainable form of development, through Local Plan reviews.*
- 3. Gloucester City Council has complied with the Duty to Cooperate in preparing the Gloucester City Plan through the various stages to date.*

- 5.6 In responding to this matter, Gloucester City Council has proactively engaged with Stroud District Council through the Stroud Local Plan Review. The Pre-Submission version of this plan was agreed at Full Council on 29<sup>th</sup> April 2021 and is, at the time of writing, subject to public consultation. Site allocation G2 'Land at Whaddon' has been safeguarded to provide for Gloucester's development needs and includes a requirement for eight Travelling Showpeople plots to provide for Gloucester's unmet needs. An extract of the policy has been submitted to the Inspector at EXAM5
- 5.7 More generally, the Council has a good working relationship with members of the Travelling Showpeople community and engage on regular basis.
- 5.8 It's also worth reiterating that Policy SD13 'Gypsies, Travellers and Travelling Showpeople' of the adopted JCS is an enabling policy that supports the delivery of appropriate sites, for both plan-making and development management purposes. On

this point, the Inspector may find it helpful to note the conclusions of the Inspector of the Tewkesbury Borough Plan in relation to Gypsy and Traveller matters, particularly how the shortfall he identified is to be met utilising Policy SD13. An extract is provided at Appendix 3.

## **6.0 Concluding comments**

- 6.1 This note has been prepared to provide the GCP Inspector with details of the work Gloucester City Council has undertaken to seek to identify deliverable sites to provide for Gypsy, Traveller and Travelling Showpeople as set out in the GTAA 2017. This has involved three call for sites, a review of City Council owned land and engagement with the Travelling Showpeople community. Whilst most sites were found to be unsuitable due to insurmountable constraints, the opportunity at the Former Town Ham Allotments was identified as a draft allocation at the Draft GCP stage in 2017, however following engagement with a Registered Provider and members of the local Travelling Showpeople community, and further analysis by the City Council, found to be unsuitable and unviability.
- 6.2 The City Council continues to seek opportunities within the city and has engaged with Homes England to explore funding opportunities. Officers continue to engage with neighbouring authorities to identify sites on the cross-boundary basis and, following the completion of an update to the GTAA, a 'Site Identification Study' will commence later this year. Through this engagement, 8 Travelling Showpeople plots have been secured as part of the safeguarded site allocation for Gloucester's unmet development needs at 'Land at Whaddon' in the Stroud Local Plan Review.
- 6.3 In the interim, Policy SD13 'Gypsies, Travellers and Travelling Showpeople' is an enabling policy that supports the delivery of suitable sites and is applicable across the JCS area.

**Appendix 1: Gloucester City – Results from ‘call for sites’ for the Gypsy, Traveller and Travelling Showpeople community**

An accompanying map showing the location of sites is provided at Appendix 2.

<b>Site name and address</b>	<b>40 Sims Lane, Quedgeley</b>
<b>Site reference</b>	<b>GSUB-01</b>
OS Reference	E: 381058 N: 215296
Area (hectares)	0.07
Greenfield/Brownfield	Brownfield
Current land-use	Gypsy/Traveller site (temporary planning permission)
Surrounding land-uses	Predominantly residential on all sides
Character of surrounding area	Suburban
Submitter status	Landowner
Planning history relevant to SALA	Temporary planning permission granted for the stationing of a static caravan and a touring caravan for one Gypsy family.

### **SITE CHARACTERISTICS**

#### **Is the site subject to the following constraints?**

Does the site fall within the Green Belt?	No
Does the site fall within an area of Flood Risk?	No
Does the site within an Area of Outstanding Natural Beauty?	No
Does the site fall within any landscape designations? (e.g. AONB, SSSI, SPA)	No
Is the site subject to contamination?	No
Are there any historic environment constraints? (e.g. Listed Buildings, Conservation Areas, Scheduled Monuments)	No
Other	Located within the Cordon Sanitaire (Netheridge Sewage Treatment Works)

#### **How is the site located with respect to...?**

Vehicular access and access to strategic transport infrastructure? (e.g. main trunk roads)	Site located in a predominantly residential area in Quedgeley to the south of Gloucester. The site would be accessed directly off Sims Lane, the main route into the residential area. Located a short distance from the A38.
Public transport services?	Very good public transport links. High frequency bus routes operate within close proximity to the site to the City Centre. Gloucester railway station located 2 miles away in the City Centre.
Pedestrian and cycle links?	Being a suburban site, pedestrian and cycle routes are very good. Site has good pedestrian and cycle routes to the nearby Quedgeley District Centre.

#### **How suitable is the surrounding highway for the proposed use? (e.g. capable of accommodating large showpeople rides and vehicles?)**

The immediate highway network would not be suitable for larger vehicles.
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#### **How is the site located with respect to...?**

Primary school	The site is located within close proximity to primary schools, the closest being located at Quedgeley.
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Secondary School	The site is located in close proximity to secondary schools, the closest being located at Quedgeley.
GP Surgery and other health services e.g. dentist	The site is located in close proximity to GP surgeries and other health services.
Local shops / post office	The site has very good access to local shops and services, being located in very close proximity to Quedgeley District Centre and with good sustainable transport choices elsewhere.
Community facilities	The site has very good access to local community facilities, for example a community centre and library.
Gloucestershire County Council accessibility information	20% most accessible.

Does the site have, or is it capable of having, access to...?

Water supply / Drainage / Electricity / Gas	The site is located directly adjacent to existing residential properties therefore it is assumed that links to key utilities can be achieved.
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### **ASSESSMENT**

Suitable	No. The site is well located in terms of access to infrastructure and shops, services and facilities. However, it is located within the Cordon Sanitaire (appeal to time limited consent dismissed, Cordon Sanitaire position upheld).
Available	Yes. The landowners have submitted the site for consideration and there are no other issues that would affect the availability of the site.
Achievable	Yes. There are no major issues or constraints that have been identified that would adversely affect the achievability of the site.
Overcome constraints	Not applicable.

<b>Site name and address</b>	<b>Former Town Ham allotments</b>
<b>Site reference</b>	<b>GTSUB-02</b>
OS Reference	E: 382226 N: 219314
Area (hectares)	1.11
Greenfield/Brownfield	Brownfield – former allotment site and landfill prior to this
Current land-use	Vacant greenfield site, formerly allotments and landfill prior to this.
Surrounding land-uses	Travelling Showpeople site (residential, storage, workshop) surrounds the western edge of the site. Railway line to the north. A417 to the south. Open green space to the west.
Character of surrounding area	Urban fringe
Submitter status	Speculative / local authority
Planning history relevant to SALA	None

### **SITE CHARACTERISTICS**

#### **Is the site subject to the following constraints?**

Does the site fall within the Green Belt?	No
Does the site fall within an area of Flood Risk?	The site is elevated from the surrounding area and is therefore not located in a flood zone
Does the site within an Area of Outstanding Natural Beauty?	No
Does the site fall within any landscape designations? (e.g. AONB, SSSI, SPA)	No
Is the site subject to contamination?	Yes – resulting from use as a former landfill. Remediation would be required to enable the site to be used for residential purposes.
Are there any historic environment constraints? (e.g. Listed Buildings, Conservation Areas, Scheduled Monuments)	No
Other	Yes – the site is unstable and would require compacting. Also, a high-pressure gas pipe cuts through the southern area of the site.

#### **How is the site located with respect to...?**

Vehicular access and access to strategic transport infrastructure? (e.g. main trunk roads)	The site has very good access to the strategic road network, being accessed from the A417. However, access into the site would have to be through the existing site, which is in private ownership.
Public transport services?	The site has very good public transport services, with several high frequency bus services running along the A417. Gloucester city centre is less than a mile away where the railway station is located.
Pedestrian and cycle links?	Pedestrian and cycle links are ok, though in order to walk to the City Centre one has to navigate the Westgate Orbital, which does not have any pedestrian provision. Beyond this there are superb links to the City Centre and cycle routes within close proximity.

#### **How suitable is the surrounding highway for the proposed use? (e.g. capable of accommodating large showpeople rides and vehicles?)**

The surrounding highway network is suitable for larger vehicles.

**How is the site located with respect to...?**

Primary school	The site is located within close proximity to primary schools, the closest being located at Kingsholm.
Secondary School	The site is located in close proximity to several secondary schools.
GP Surgery and other health services e.g. dentist	The site is located within close proximity to Gloucester City Centre, which offers a variety of health services.
Local shops / post office	The site is located within close proximity to Gloucester City Centre, which offers a variety of shops, services and facilities.
Community facilities	The site is located within close proximity to Gloucester City Centre, which offers a variety of community facilities.
Gloucestershire County Council accessibility information	20% most accessible.

**Does the site have, or is it capable of having, access to...?**

Water supply / Drainage / Electricity / Gas	The site is located directly adjacent to existing residential properties therefore it is assumed that links to key utilities can be achieved.
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**ASSESSMENT**

Suitable	Uncertain. The site is well located in terms of access to infrastructure and shops, services and facilities. However, the site is subject to a number of significant constraints, namely access, significant land contamination, land stability and the presence of a high-pressure gas pipe running through the southern area of the site.
Available	Yes
Achievable	Uncertain. The site is subject to significant constraints that would need to be addressed in order for the site to be developed for residential purposes. Costs likely high.
Overcome constraints	Uncertain.

<b>Site name and address</b>	<b>Port Ham Sidings, Off A417</b>
<b>Site reference</b>	<b>GTSUB-03</b>
OS Reference	E: 381894 N: 219199
Area (hectares)	3.69
Greenfield/Brownfield	Brownfield
Current land-use	Vacant site adjacent to electricity substation
Surrounding land-uses	The site is located directly adjacent to an electricity substation. To the north, west and south there is open green space (flood plain)
Character of surrounding area	Urban fringe / rural
Submitter status	Speculative
Planning history relevant to SALA	None

### **SITE CHARACTERISTICS**

#### **Is the site subject to the following constraints?**

Does the site fall within the Green Belt?	No
Does the site fall within an area of Flood Risk?	The entirety of the site is located in Flood Zone 3A/3B.
Does the site within an Area of Outstanding Natural Beauty?	No
Does the site fall within any landscape designations? (e.g. AONB, SSSI, SPA)	Located in a Landscape Conservation Area
Is the site subject to contamination?	Potential contamination concerns, due to the former railway line, substation and earthworks
Are there any historic environment constraints? (e.g. Listed Buildings, Conservation Areas, Scheduled Monuments)	No
Other	No

#### **How is the site located with respect to...?**

Vehicular access and access to strategic transport infrastructure? (e.g. main trunk roads)	The site has good access to the A417. However, the access route is located within the functional floodplain and therefore has no dry access.
Public transport services?	The site has very good public transport links – high frequency bus routes run along So Oswalds Road.
Pedestrian and cycle links?	Satisfactory, though there are no shops or services within walking distance.

#### **How suitable is the surrounding highway for the proposed use? (e.g. capable of accommodating large showpeople rides and vehicles?)**

The surrounding highway network would be suitable for larger vehicles.
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#### **How is the site located with respect to...?**

Primary school	The site is located within close proximity to primary schools, the nearest being located at Kingsholm.
Secondary School	The site is located within close proximity to several secondary schools.
GP Surgery and other health services e.g. dentist	The site is located within close proximity to a variety of health services.
Local shops / post office	The site is located within close proximity to a variety of shops, services and facilities.

Community facilities	The site is located within close proximity to a variety of community facilities.
Gloucestershire County Council accessibility information	20% most accessible.

**Does the site have, or is it capable of having, access to...?**

Water supply / Drainage / Electricity / Gas	No
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**ASSESSMENT**

Suitable	No. The site and access are located within flood zones 3A and 3B. Land located within these zones is not suitable for residential development.
Available	Unknown
Achievable	Not applicable
Overcome constraints	Not applicable

<b>Site name and address</b>	<b>Land adjacent to Hempsted Recycling Centre</b>
<b>Site reference</b>	<b>GTSUB-04</b>
OS Reference	E: 381593 N: 217704
Area (hectares)	3.54
Greenfield/Brownfield	Greenfield
Current land-use	Agriculture
Surrounding land-uses	Hempsted Recycling Centre and landfill are located to the north of the site. Employment uses to the east. The former oil storage depot and some residential properties are located to the south. Open green space is located to the west.
Character of surrounding area	Urban fringe
Submitter status	Speculative
Planning history relevant to SALA	None

### **SITE CHARACTERISTICS**

#### **Is the site subject to the following constraints?**

Does the site fall within the Green Belt?	No
Does the site fall within an area of Flood Risk?	The periphery of the site is located in Flood Zone 3B. The central area of the site in Flood Zone 2.
Does the site within an Area of Outstanding Natural Beauty?	No
Does the site fall within any landscape designations? (e.g. AONB, SSSI, SPA)	Located within a Landscape Conservation Area and proposed Prime Biodiversity area.
Is the site subject to contamination?	The site is located adjacent to Hempsted Landfill, which is known to be a significant source of ground gas. A ground gas investigation would need to be undertaken, the results of which would affect the suitability of the site for residential purposes.
Are there any historic environment constraints? (e.g. Listed Buildings, Conservation Areas, Scheduled Monuments)	No
Other	Potential odour emissions from the landfill and recycling centre.

#### **How is the site located with respect to...?**

Vehicular access and access to strategic transport infrastructure? (e.g. main trunk roads)	The site is located in close proximity to the south west bypass. The road adjacent to the site is utilised by large vehicles using the landfill and recycling centre.
Public transport services?	High frequency bus routes utilise the south west bypass though a bus stop isn't within easy walking distance.
Pedestrian and cycle links?	There are pedestrian pavements along the road between the site and the south west bypass. It is quite peripheral from the main built up area of the city.

#### **How suitable is the surrounding highway for the proposed use? (e.g. capable of accommodating large showpeople rides and vehicles?)**

The surrounding highway network is suitable for larger vehicles.
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**How is the site located with respect to...?**

Primary school	The site is located in close proximity to primary schools, the nearest being located at Hempsted.
Secondary School	The site is located in close proximity to secondary schools.
GP Surgery and other health services e.g. dentist	The site is located within close proximity to GP surgeries and other health services, though not within walking distance.
Local shops / post office	Located fairly close to local shops and services (corner shop off Hempsted Lane, Sainsbury's supermarket), though not within walking distance.
Community facilities	The site is located within fairly close proximity to community facilities, located at Hempsted and also the city centre.
Gloucestershire County Council accessibility information	20% most accessible

**Does the site have, or is it capable of having, access to...?**

Water supply / Drainage / Electricity / Gas	The site is located within close proximity to existing employment and residential uses and therefore assumed that links to key utilities can be achieved.
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**ASSESSMENT**

Suitable	No. The site is located within 250m of the Hempsted Landfill site and there are inherent environmental constraints including odour, dust and noise, including a high volume of HGV highways traffic. The site is also subject to flood risk being located in Flood Zone 2 and 3B.
Available	No
Achievable	Not applicable
Overcome constraints	No

<b>Site name and address</b>	<b>Land at Hempsted Meadows, Off Secunda Way</b>
<b>Site reference</b>	<b>GTSUB-05</b>
OS Reference	E: 381598 N: 215971
Area (hectares)	2.27
Greenfield/Brownfield	Greenfield
Current land-use	Car boot sales and other events
Surrounding land-uses	Hempsted Meadows car boot sale area is located to the west, with the south west bypass and agricultural land beyond. Industrial uses to the north, east and south. Bounded by the Gloucester-Sharpness canal to the east and south.
Character of surrounding area	Urban fringe
Submitter status	Speculative
Planning history relevant to SALA	None

### **SITE CHARACTERISTICS**

Is the site subject to the following constraints?

Does the site fall within the Green Belt?	No
Does the site fall within an area of Flood Risk?	The entirety of the site is located in Flood Zone 3B.
Does the site within an Area of Outstanding Natural Beauty?	No
Does the site fall within any landscape designations? (e.g. AONB, SSSI, SPA)	Site located within a Landscape Conservation Area.
Is the site subject to contamination?	No
Are there any historic environment constraints? (e.g. Listed Buildings, Conservation Areas, Scheduled Monuments)	No
Other	Located with the Cordon Sanitaire (Netheridge Sewage Treatment Works)

### **How is the site located with respect to...?**

Vehicular access and access to strategic transport infrastructure? (e.g. main trunk roads)	The site has very good vehicular access, being located directly off the south west bypass (Secunda Way).
Public transport services?	Very good public transport links, being the route of several high frequency bus services.
Pedestrian and cycle links?	Good pedestrian and cycle links.

### **How suitable is the surrounding highway for the proposed use? (e.g. capable of accommodating large showpeople rides and vehicles?)**

The surrounding highway network is suitable for larger vehicles.
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### **How is the site located with respect to...?**

Primary school	The site is located in close proximity to primary schools, the nearest being located at Hempsted.
Secondary School	The site is located in close proximity to a variety of secondary schools.
GP Surgery and other health services e.g. dentist	The site is located in close proximity to GP surgeries and other health services.

Local shops / post office	There are shops, services and facilities located in close proximity to the site at Hempsted, Quedgeley, along Bristol Road and at Gloucester City Centre.
Community facilities	There are community facilities located in close proximity to the site at Hempsted, Quedgeley, along Bristol Road at Gloucester City Centre.
Gloucestershire County Council accessibility information	Less accessible.

**Does the site have, or is it capable of having, access to...?**

Water supply / Drainage / Electricity / Gas	The site is located within close proximity to existing employment and residential uses and therefore assumed that links to key utilities can be achieved.
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**ASSESSMENT**

Suitable	No – location with Cordon Sanitaire and Flood Risk.
Available	No
Achievable	Not applicable.
Overcome constraints	No

<b>Site name and address</b>	<b>Land off South West Bypass</b>
<b>Site reference</b>	<b>GTSUB-06</b>
OS Reference	E: 381260 N: 215744
Area (hectares)	1.24
Greenfield/Brownfield	Greenfield
Current land-use	Vacant site adjacent to Netheridge Sewage Treatment Works
Surrounding land-uses	The Netheridge Sewerage Treatment Works abuts the site directly to the west. To the south is the Gloucester-Sharpness Canal. To the east is the south west bypass with industrial premises beyond. Residential properties are located to the north.
Character of surrounding area	Urban fringe
Submitter status	Speculative
Planning history relevant to SALA	None. However it should be noted that the site was submitted for consideration for an anaerobic digestion facility to the Gloucestershire Waste Core Strategy consultation as an objection site, but was not taken forward to the next stage of the strategy.

### **SITE CHARACTERISTICS**

#### **Is the site subject to the following constraints?**

Does the site fall within the Green Belt?	No
Does the site fall within an area of Flood Risk?	The majority of the site and all of the access road is located in Flood Zone 1. A small area to the north west of the submitted site is located in Flood Zone 2.
Does the site within an Area of Outstanding Natural Beauty?	No
Does the site fall within any landscape designations? (e.g. AONB, SSSI, SPA)	Located within a Landscape Conservation Area and proposed Prime Biodiversity Area.
Is the site subject to contamination?	Potential contamination concerns with regard to adjacent sewage works.
Are there any historic environment constraints? (e.g. Listed Buildings, Conservation Areas, Scheduled Monuments)	No
Other	Located within the Cordon Sanitaire (Netheridge Sewage Treatment Works).

#### **How is the site located with respect to...?**

Vehicular access and access to strategic transport infrastructure? (e.g. main trunk roads)	The site has very good vehicular access being located off the south west bypass and in very close proximity to the A38.
Public transport services?	The site has very good public transport links with high frequency bus routes along the south west bypass and the A38.
Pedestrian and cycle links?	The site is located within close proximity to cycle paths. Pedestrian access in the form of footpaths in the are good.

#### **How suitable is the surrounding highway for the proposed use? (e.g. capable of accommodating large showpeople rides and vehicles?)**

The surrounding highway network is suitable for larger vehicles.
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**How is the site located with respect to...?**

Primary school	The site is located in close proximity to primary schools, the nearest being located at Quedgeley.
Secondary School	The site is located in close proximity too several secondary schools, the nearest being located at Quedgeley.
GP Surgery and other health services e.g. densist	The site is located in close proximity to GP and other health care services, for example at Quedgeley.
Local shops / post office	The site is located in close proximity to Quedgeley District Centre and within close proximity to the town centre which can be accessed by public transport.
Community facilities	The site is located in close proximity to community facilities, for example at Quedgeley.
Gloucestershire County Council accessibility information	20% most accessible

**Does the site have, or is it capable of having, access to...?**

Water supply / Drainage / Electricity / Gas	The site is located adjacent to existing permanent and gypsy residential properties and it is assumed that links to essential utilities can be achieved.
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**ASSESSMENT**

Suitable	No. The site is located within the Cordon Sanitaire and directly adjacent to the Netheridge Sewage Treatment Works.
Available	No
Achievable	Not applicable
Overcome constraints	No

<b>Site name and address</b>	<b>Land adjacent to Riverside Health and Fitness Club (Westgate Park and Boating Lake)</b>
<b>Site reference</b>	<b>GTSUB-17</b>
OS Reference	E: 382539 N 219217
Area (hectares)	4.97
Greenfield/Brownfield	Greenfield
Current land-use	Boating lake / Crazy Golf Course / Public Open Space
Surrounding land-uses	River Severn abuts the western boundary, the railway line the northern boundary. Riverside sports and leisure club to the east with playing pitches beyond. A417 and retail uses to the south.
Character of surrounding area	Sub-urban
Submitter status	Speculative
Planning history relevant to SALA	None

### **SITE CHARACTERISTICS**

#### **Is the site subject to the following constraints?**

Does the site fall within the Green Belt?	No
Does the site fall within an area of Flood Risk?	The entirety of the site is in Flood Zone 3B.
Does the site within an Area of Outstanding Natural Beauty?	No
Does the site fall within any landscape designations? (e.g. AONB, SSSI, SPA)	No
Is the site subject to contamination?	No
Are there any historic environment constraints? (e.g. Listed Buildings, Conservation Areas, Scheduled Monuments)	No
Other	No

#### **How is the site located with respect to...?**

Vehicular access and access to strategic transport infrastructure? (e.g. main trunk roads)	The site has very good access to the strategic road network, being accessed from the A417.
Public transport services?	The site has very good public transport services, with several high frequency bus services running along the A417. Gloucester City Centre is less than a mile away where the Railway Station is located.
Pedestrian and cycle links?	Pedestrian and cycle links are ok, though in order to walk to the City Centre one has to navigate the Westgate Orbital, which does not have any pedestrian provision. Beyond this there are superb links to the City Centre and cycle routes within close proximity

#### **How suitable is the surrounding highway for the proposed use? (e.g. capable of accommodating large showpeople rides and vehicles?)**

The surrounding highway network is suitable for larger vehicles.
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#### **How is the site located with respect to...?**

Primary school	The site is located within close proximity
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	primary schools, the nearest being located at Kingsholm.
Secondary School	The site is located in close proximity to several secondary schools.
GP Surgery and other health services e.g. dentist	The site is located within close proximity to Gloucester City Centre, which offers a variety of health services.
Local shops / post office	The site is located within close proximity to Gloucester City Centre, which offers a variety of shops, services and facilities.
Community facilities	The site is located within close proximity to Gloucester City Centre, which offers a variety of community facilities.
Gloucestershire County Council accessibility information	20% most accessible.

**Does the site have, or is it capable of having, access to...?**

Water supply / Drainage / Electricity / Gas	The site is located directly adjacent to existing residential properties therefore it is assumed that links to key utilities can be achieved.
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**ASSESSMENT**

Suitable	No – site located in Flood Zone 3B and Public Open Space.
Available	No
Achievable	Not applicable
Overcome constraints	No

<b>Site name and address</b>	<b>Land South of A417 (Over Causeway)</b>
<b>Site reference</b>	<b>GTSUB-18</b>
OS Reference	E: 382954 N: 219045
Area (hectares)	0.58
Greenfield/Brownfield	Brownfield
Current land-use	Surface car park (for Alney Island)
Surrounding land-uses	A417 and A430 abuts the northern, western and southern boundaries of the site. Green space and the River Severn located to the east.
Character of surrounding area	Urban fringe
Submitter status	Speculative
Planning history relevant to SALA	None

## **SITE CHARACTERISTICS**

### **Is the site subject to the following constraints?**

Does the site fall within the Green Belt?	No
Does the site fall within an area of Flood Risk?	Flood zones 3B and 3A
Does the site within an Area of Outstanding Natural Beauty?	No
Does the site fall within any landscape designations? (e.g. AONB, SSSI, SPA)	Located within a Landscape Conservation Area
Is the site subject to contamination?	No
Are there any historic environment constraints? (e.g. Listed Buildings, Conservation Areas, Scheduled Monuments)	No
Other	No

### **How is the site located with respect to...?**

Vehicular access and access to strategic transport infrastructure? (e.g. main trunk roads)	The site has very good access to the A417.
Public transport services?	The site has very good public transport links – high frequency bus routes run along Over Causeway.
Pedestrian and cycle links?	Satisfactory, though there are no shops or services within walking distance.

### **How suitable is the surrounding highway for the proposed use? (e.g. capable of accommodating large showpeople rides and vehicles?)**

The surrounding highway network would be suitable for larger vehicles.
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### **How is the site located with respect to...?**

Primary school	The site is located within close proximity to primary schools, the nearest being located at Kingsholm.
Secondary School	The site is located within close proximity to several secondary schools.
GP Surgery and other health services e.g. dentist	The site is located within close proximity to a variety of health services.
Local shops / post office	The site is located within close proximity to a variety of shops, services and facilities.
Community facilities	The site is located within close proximity to a variety of community facilities.

Gloucestershire County Council accessibility information	20% most accessible.
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**Does the site have, or is it capable of having, access to...?**

Water supply / Drainage / Electricity / Gas	None on site though located fairly close to existing development to the north.
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**ASSESSMENT**

Suitable	No – located within Flood Zones 3B and 3A.
Available	No
Achievable	Not applicable
Overcome constraints	No

<b>Site name and address</b>	<b>Land at Naas Lane, East of Waterwells Business Park</b>
<b>Site reference</b>	<b>GTSUB-20</b>
OS Reference	E: 381927 N: 212502
Area (hectares)	2.8
Greenfield/Brownfield	Brownfield
Current land-use	Open storage of vehicles, utilised for business purposes by the adjacent International Motors Group.
Surrounding land-uses	International Motors Group employment use to the north, green field to the south, railway line with green open space to the east (Stroud District Council administrative area), Waterwells Business Park to the west.
Character of surrounding area	Urban periphery.
Submitter status	Speculative.
Planning history relevant to SALA	Site previously identified in the emerging Local Development Framework in 2006/07 as a draft allocation for Travelling Showpeople residential development. However, the landowner confirmed the land was not available for this use and subsequently not taken forward.

### **SITE CHARACTERISTICS**

#### **Is the site subject to the following constraints?**

Does the site fall within the Green Belt?	No
Does the site fall within an area of Flood Risk?	No
Does the site within an Area of Outstanding Natural Beauty?	No
Does the site fall within any landscape designations? (e.g. AONB, SSSI, SPA)	No
Is the site subject to contamination?	No
Are there any historic environment constraints? (e.g. Listed Buildings, Conservation Areas, Scheduled Monuments)	Proximity of listed villas.
Other	Proximity to railway line requiring buffer to development.

#### **How is the site located with respect to...?**

Vehicular access and access to strategic transport infrastructure? (e.g. main trunk roads)	Very good access, being located adjacent to Waterwells Business Park, which has high quality industrial strength roads. The access adjacent to the north west of the site.
Public transport services?	Very good – in close proximity to Waterwells Park and Ride, and strategic residential developments at Kingsway to the north and Hunts Grove to the south.
Pedestrian and cycle links?	Very good – see above.

#### **How suitable is the surrounding highway for the proposed use? (e.g. capable of accommodating large showpeople rides and vehicles?)**

Very good – see above.
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#### **How is the site located with respect to...?**

Primary school	The site is located within close proximity to primary schools, the nearest being located at Kingsway and Hunts Grove.
Secondary School	The site is located within close proximity to primary schools, the nearest being located at Quedgeley.
GP Surgery and other health services e.g. dentist	The site is located within close proximity to a variety of health services.
Local shops / post office	The site is located within close proximity to a variety of shops, services and facilities.
Community facilities	The site is located within close proximity to a variety of community facilities.
Gloucestershire County Council accessibility information	20% most accessible.

**Does the site have, or is it capable of having, access to...?**

Water supply / Drainage / Electricity / Gas	Assumed access can be provided given proximity to built development.
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**ASSESSMENT**

Suitable	Yes
Available	No – landowner confirmed through call for sites sites that this site isn't available and is to be developed as an extension to International Motor's current operation to the north.
Achievable	N/A
Overcome constraints	N/A

**Appendix 2 – Site location map**

Please see separate document.

### **Appendix 3 – Extract from the Tewkesbury Borough Plan Inspector’s interim report relating to Gypsy and Traveller matters**

#### Gypsy and traveller sites

28. Based on the Gypsy and Traveller Accommodation Assessment carried out in 2017, the supporting text to JCS Policy SD13 sets out the number of pitches and plots that are required in each district between 2016 and 2031, both for those that meet the definition in the Planning Policy for Traveller Sites and those that do not. Contrary to the Council’s view in EXAM027, the needs of the latter group should also be provided under the requirements of JCS Policy SD11 and the Housing and Planning Act 2016, albeit there is no need to demonstrate five years supply of deliverable sites for those that do not meet the definition.

29. The overall requirement for the Borough is 78 pitches for Gypsies and Travellers of which 20 are for those who either definitely or are likely to meet the definition. With 23 pitches granted permission since 2016 the PPTS requirement has already been met. However, 55 pitches still need to be provided, and in practice some of these will be for those meeting the definition. Following a call for sites and consideration of public land, the TBP as submitted includes allocations for a further 17 pitches, leaving 38 still to be identified in the period to 2031, a challenging figure.

30. Whilst satisfied that few suitable sites have come forward and the Council has generally taken a proactive approach to site finding, one existing site providing seven pitches at Brookside Stables, Badgeworth, which has had a succession of temporary consents, has not been allocated despite meeting the site selection requirements for inclusion in the Preferred Options consultation in 2018. The reasons for excluding the site following that consultation are unconvincing. The site should be allocated in the TBP this reducing the shortfall to 31 pitches which will need to be met through planning applications assessed against the criteria in Policy SD13.

The full report is available to download at [Examination Documents – Inspector’s Interim Note](#)