

PLANNING AND LICENSING COMMITTEE
14th October 2020
ADDITIONAL PAGES UPDATE

AVAILABLE FOR PUBLIC INSPECTION UNDER THE PROVISIONS OF THE LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985

ADDITIONAL REPRESENTATIONS ON SCHEDULE ITEMS : Pages 5 - 26		
Item:	Ref No:	Content:
01	19/02248/FUL (Land At Dunstall Farm Fosseyway Moreton-In-Marsh)	<p>Email and correspondence (attached) from Moreton-in-Marsh Town Council :</p> <p>Please find enclosed 2 supporting papers to the Statement that Moreton-in-Marsh Town Council will forward to you on Monday.</p> <p>In short the papers illustrate the point we shall be making about continuing Infrastructure Lag following the rapid housing development growth Moreton has experienced since 2011.</p> <p>Ongoing issues with the congested mini roundabouts resulted in the enclosed letter to GCC drafted March 2020 (sent 9 June 2020) A429/A44 INTERSECTIONS MORETON IN MARSH – TOWN COUNCIL CONCERNS and our response to the Governments White Paper: Changes to the Current Planning System which uses the Dunstall Farm application to illustrate the points the Town Council is making. In short both documents indicate the issues the Town faces and the difficulties we have in trying to resolve the cumulative effect of development and infrastructure lag.</p> <p>Chair Moreton in Marsh Town Council</p> <p>2 Further emails received from local residents:</p> <p>i) I object to the above development on the basis of access, and overdevelopment:</p> <ul style="list-style-type: none"> • The provision of facilities in Moreton-in-Marsh does not support the addition of 250 additional dwellings. In particular the absence of adequate pre-school nursery provision, and limited primary school provision for this many dwellings • This site is not well enough linked to Moreton to encourage walking and there is no cycling path provision. In particular this will affect dwellings closest to A429, and furthest from the footpath linked to Fosseyway Avenue. The pedestrian footpath on the A429 into Moreton is exceptionally unpleasant to use along this section as it is too narrow to confidently walk two abreast

		<p>alongside 38 tonne trucks driving at 30 mph. There has been a serious pedestrian incident on the nearby zebra crossing involving a lorry and other near misses. The alternative pedestrian link through the existing footpath to Fossey Avenue is too far from many of the proposed properties. This will generate significant extra car journeys into the town, especially to the primary school which is not located with suitable car/pedestrian separation to cope.</p> <ul style="list-style-type: none"> • The footpath access to the town centre via Fossey Avenue is narrow, constrained by existing properties and enclosed by high fencing at the rear of gardens. It is not suitable for combined cycle and wheelchair use and does not feel 'safe' after dark. Its unsuitability for access to the town will encourage additional vehicle journeys. • Scholars Transport - The estimated additional fourteen Year 12/13 students (reference "50 additional Secondary school students" in Highways report) will neither qualify for, or be able to access the scholars transport mentioned in the GCC Highways comment, as there is no statutory obligation for this to be provided and numerous Chipping Campden School students living in Moreton were unable to access the 'spare seat scheme' prior to Covid-19 adjustments. These students will create extra car journeys along A429. <p>ii) Correspondence attached</p> <p>Email from applicant confirming agreement to meet GCC Early Years payment request of £996,006:</p> <p>The Applicant's offer of £675k was based on the number of children yielded from GCC's pupil product ratio who would be eligible for Government funded childcare places. GCC are aware of the Applicant's offer, however as it has not been accepted it is apparent that GCC maintain their original request for £996k, as justified and CIL compliant. In the absence of a concession by GCC to the lower figure, the Applicant revises its position to meet GCC's request in full.</p> <p>I can also confirm that Spitfire would be willing to accept a suitably worded condition relating to water butts should this be requested.</p>
03	<p>20/01582/FUL</p> <p>(Grove Cottage Hazleton)</p>	<p>CASE OFFICER UPDATE:</p> <p>Correction to the Case Officer Report.</p> <p>Under heading (e) Highways Safety, Page 106, final paragraph should read 1m not 2m.</p>

		<p>'A number of concerns have been raised regarding highways safety as a result of the development. The concerns raised are two-fold, relating to the access and visibility of the host and neighbouring property and relating to the restricted use of the highway, most notably by farm vehicles. With regards to visibility, the proposed extension will be set within the existing building lines of the property, set back from the highway by <u>1m</u> at its closest point. The development will therefore not impinge upon existing site lines.'</p>
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ROLES AND RESPONSIBILITIES

PLANNING AND LICENSING COMMITTEE

1. To deal with regulatory matters required by, and flowing from, the Town and Country Planning and allied legislation.
2. To discharge all of the Council's regulatory licensing functions.
3. To make recommendations to the Cabinet on the budget for the Committee.
4. To determine the level of delegation to Officers.

(END)

CHAIR OF THE PLANNING AND LICENSING COMMITTEE

OVERALL ROLE

The Chair of the Planning and Licensing Committee is responsible for the effective management and running of the Committee's business. This involves directing the Committee's business agenda and the effective management of Committee deliberations and maintaining a public image of effective consideration of matters and other business brought before it.

The Chair of the Committee is expected to encourage Committee Members to take part at all stages in deliberations.

SPECIFIC RESPONSIBILITIES

- (a) To Chair meetings of the Planning and Licensing Committee.
- (b) In conjunction with the Vice-Chair, to ensure that appropriate expert and specialist advice is made available to the Committee.
- (c) To determine, in liaison with the Proper Officer, arrangements for special meetings of the Committee.
- (d) To ensure, in liaison with the Proper Officer, that Committee Members benefit from appropriate training and development to deal effectively with the Committee's business.
- (e) To maintain high standards of probity and adherence to standards of conduct and protocols.
- (f) To maintain the non-party political status of Committee proceedings and meeting management.

VICE-CHAIR OF THE PLANNING AND LICENSING COMMITTEE

OVERALL ROLE

The Vice-Chair of the Planning and Licensing Committee is responsible for supporting the Chair with the effective management and running of the Committee's business. In the absence of the Chair, the Vice-Chair will Chair Committee meetings and conduct its business. This involves directing the Committee's business agenda and the effective management of Committee deliberations and maintaining a public image of effective management of the Council's business and other matters brought before it.

The Vice-Chair is expected to support the Chair in encouraging Committee Members to take part at all stages of deliberations.

SPECIFIC RESPONSIBILITIES

- (a) To support the Chair of the Committee in the conduct of the Committee's business.
- (b) In the absence of the Chair, to Chair meetings of the Committee.
- (c) In conjunction with the Chair, to ensure that appropriate expert and specialist advice is made available to the Committee.

(END)

RESPONSE TO THE GOVERNMENT WHITE PAPER – CHANGES TO THE CURRENT PLANNING SYSTEM (CHANGES TO POLICY AND REGULATION)

Moreton-in-Marsh Town Council response to this consultation includes some factual evidence from the following planning application to illustrate parts of its response.

[Erection of 250 dwellings \(to include 150 Market Housing and 100 Affordable Housing\) with associated vehicular access, landscaping, drainage and public open space \(phased development of 146 dwellings in phase 1, 92 dwellings in phase 2 and 12 dwellings in separate phases thereafter\).](#)

Land At Dunstall Farm Fosseyway Moreton-In-Marsh Gloucestershire
Ref. No: 19/02248/FUL | Validated: Fri 14 Jun 2019 | Status: Awaiting decision

Simple analysis of the failure to build under existing planning policy and regulations illustrates exactly why there is a current shortfall in build completions. It is unlikely that de regulating the planning system and changing the Standard Method for Assessing Housing Numbers in Strategic Plans will solve the existing build completion shortfalls let alone lead to the completion of additional requirements.

Whilst some of the proposed reforms are welcome, others do not offer the solution to build completion shortfalls owing to infrastructure lag under the current planning system. Should the Government continue to demand increased areas for building development within a finite land space (England) at pace if it will not result in addressing current issues? Taking into account Climate Emergency, BREXIT, COVID 19 and The Leaders Pledge for Nature (PM to UN 28 Sept 20) a reassessment needs to be made.

The reality Government has to face is why 800,000+ homes already have planning consent but have yet to be built? The answer is possible illustrated by the planning application for Moreton-in-Marsh which has stalled owing to a number of infrastructure issues which, even when subject to planning conditions, will not proceed at pace: Land At Dunstall Farm Fosseyway Moreton-In-Marsh Gloucestershire
Ref. No: 19/02248/FUL | Validated: Fri 14 Jun 2019 | Status: Awaiting decision

Thames Water have identified that some capacity exists within the foul water network to serve 50 dwellings but beyond that, upgrades to the waste water network will be required. Works are ongoing to understand this in more detail and as such Thames Water feel it would be prudent for an appropriately worded planning condition to be attached to any approval to ensure development doesn't outpace the delivery of essential infrastructure.

The Standard Method for Assessing Housing Numbers in Strategic Plans

Q1: Do you agree that planning practice guidance should be amended to specify that the appropriate baseline for the standard method is whichever is the higher of the level of 0.5% of housing stock in each local authority area OR the latest household projections averaged over a 10-year period?

No

Factual evidence of why the planning application (Ref. No: 19/02248/FUL | Validated: Fri 14 Jun 2019 | Status: Awaiting decision) referenced in this response awaits a decision is nothing to do with the failure of the current planning system. The Cotswold District Local Plan included Dunstall Farm as suitable for development but the current calculated requirement cannot be delivered owing to significant infrastructure shortfalls.

The ability to demand these infrastructure improvements come forward at a pace to match the scale of development permitted is currently often - if not always - beyond the powers of a Local Planning Authority, and possibly all local authorities. Rather than remove powers and controls from Local Planning Authorities, Government should examine how best to increase Local Authority powers to ensure the timely delivery of essential infrastructure to support the desired rate of development.

Forecasting future housing need based on what has been a high rate of recent delivery in Moreton-in-Marsh creates a skewed, high baseline.

A similar argument can be made in respect of the use of 0.5% of housing stock where a baseline taken from recent housing delivery takes no account of what has already been delivered. As a Town Council we suggest that future housing need is calculated taking into account that which has already been delivered.

Cotswold District Council 'front-loaded' housing delivery in its current Plan Period, with Moreton-in-Marsh seeing the majority of its allocation delivered in the first 8 years of this 20-year plan: circa 800 houses 2011-2019, from a target of circa 1,000, in market town of circa 1,4000 as of 2011. To set the baseline at this current level of growth is unsustainable.

Q2: In the stock element of the baseline, do you agree that 0.5% of existing stock for the standard method is appropriate? If not, please explain why.

No

As stated in the response to Q1 the inclusion of existing stock as a part of the calculation, plus the projection means that the increase will always be higher and takes no account of what has already been delivered at the halfway point of a 'front-loaded' 20-year delivery schedule and strategy.

There is no guarantee that suitable infrastructure development will be delivered in tandem with any planned developments. Current evidence clearly shows an existing lag between housing delivery in Moreton-in-Marsh and infrastructure development.

Observations

The St David's School site above, appears barely to accept physical expansion to 420 places. There appears no way to enlarge it further, being landlocked even were the school to accept a small enlargement and a move back to mixed aged classes necessitated when the capacity is not a full form of entry.

Conclusions

Thus to accommodate housing growth there will be a need for provision to be made elsewhere. Either to accommodate the equivalent of future applications from outside of Moreton because places are taken from growth within Moreton or a continuation of the daily outward flow to schools outside Moreton plus an increase in this outward flow.

Transporting primary school children to other settlements that may well be required to expand their own development land supply and school places does nothing to promote carbon reduction and healthy Active Travel options and behaviours in rural areas but illustrates the real cause of delay to building within the current planning guidelines.

Q3: Do you agree that using the workplace-based median house price to median earnings ratio from the most recent year for which data is available to adjust the standard method's baseline is appropriate? If not, please explain why.

No

Building more houses in Moreton has not led to a reduction in price. Houses situated in the Cotswolds attract premium prices and 'affordable' homes are not necessarily offering homes for social rent. 'Affordability' in the Cotswolds is sometimes not a reality. The points below are further illustrations relevant to this question:

- land banking (i.e. land being used as a financial asset to increase share prices rather than to deliver housing) and developers purposefully 'drip-feeding' new homes into the market to inflate house prices;
- wages have not kept pace with house prices;
- not enough social housing has been built;
- low interest rates and the increased ability of people being able to get a mortgage have both fuelled an increase in house prices; and
- second home ownership and buy to let have removed housing from the market that could otherwise be made available to first home owners, and the resulting

increased demand within a reduced pool of housing stock inflates house prices and worsens affordability.

As with Q's 1 and 2, inflating the target to build housing will not result in the desired Government outcomes.

The Council notes that the Planning for the Future White Paper proposes that the extent of land constraints in an area would be taken into consideration when setting housing requirements. In light of The Leaders Pledge for Nature (PM to UN 28 Sept 20) and given that Moreton-in-Marsh sits half in an Area of Outstanding Natural Beauty (AONB) surrounded by Special Landscape Areas (SLA) we anticipate some amendments will be made to the proposals outlined in this White Paper as a result of the response to this consultation.

The New Standard Method

Q4: Do you agree that incorporating an adjustment for the change of affordability over 10 years is a positive way to look at whether affordability has improved? If not, please explain why.

No.

Without updated census information, i.e. actual data based on residence, no assumptions can be made. The White Paper paragraph 31 states:

High house prices indicate a relative imbalance between the supply and demand for new homes, making homes less affordable. The affordability of homes is the best evidence that supply is not keeping up with demand

This is an incorrect assumption in the White Paper and not true of Moreton-in-Marsh in the Cotswolds given the difference between income levels and house prices.

House price is not just supply-and-demand, but also driven by desirability of the location, which often necessitates restrictions on design, density, character if we are to preserve and enhance our areas of outstanding natural, built and historic quality. Other factors are communication lines, quality of local amenity (school rating, availability of GP, provision of shops etc) are beyond the Planning System's ability to control. For example, a school might be rated Excellent, which would boost local house price within its catchment area, but the Planning System cannot currently ensure that such a school can expand at the same pace as the desired rate of development while maintaining its status and quality of teaching. The ability to resolve school planning issues ahead of development requires the need to strategically plan for the future with the power to determine a resolution given to a relevant responsible body. The White Paper places a need to deliver increased housing at pace without fundamental consideration being given to economic planning and population growth or decline. In other words it exacerbates the existing constraints on housing delivery already delayed by infrastructure lag.

Q5: Do you agree that affordability is given an appropriate weighting within the standard method? If not, please explain why.

No.

The need for additional housing must take in other factors apart from housing affordability which can be skewed in the Cotswolds for the reasons stated in answer to Q3. In addition, in a small geographical area such as Moreton-in-Marsh average house prices can be skewed by one or two sales. According to the Land Registry (source Moreton-in-Marsh Housing Needs survey 2020) the highest price paid in Moreton-in-Marsh in the last 2 years was £585,000 and the lowest price £150,000.

Do you agree that authorities should be planning having regard to their revised standard method need figure, from the publication date of the revised guidance, with the exception of:

Q6: Authorities which are already at the second stage of the strategic plan consultation process (Regulation 19), which should be given 6 months to submit their plan to the Planning Inspectorate for examination?

No comment on this proposal.

Q7: Authorities close to publishing their second stage consultation (Regulation 19), which should be given 3 months from the publication date of the revised guidance to publish their Regulation 19 plan, and a further 6 months to submit their plan to the Planning Inspectorate?

If not, please explain why. Are there particular circumstances which need to be catered for?

No comment on this proposal.

Delivering First Homes

Q8: The Government is proposing policy compliant planning applications will deliver a minimum of 25% of onsite affordable housing as First Homes, and a minimum of 25% of offsite contributions towards First Homes where appropriate. Which do you think is the most appropriate option for the remaining 75% of affordable housing secured through developer contributions? Please provide reasons and / or evidence for your views (if possible):

- i) Prioritising the replacement of affordable home ownership tenures, and delivering rental tenures in the ratio set out in the local plan policy.
- ii) Negotiation between a local authority and developer.
- iii) Other (please specify)

ii. Negotiation between a local authority and developer The NPPF currently requires local planning authorities' to prepare a Local Housing Needs Assessment to assess their full housing needs, identifying the mix of housing and the range of tenures that the local population is likely to need over the plan period.

This question relates to what type of first home will best fit a local requirement. The impact of a nationally set requirement and implications for developers might not achieve the desired outcome as developers will be driven by viability considerations. The new First Home requirement could result in other affordable options not being able to be met. Despite the current Mortgage interest rate being low, first time buyers are still finding it difficult to secure a mortgage and many lenders are increasing the amount of a deposit.

Option 2 for the remaining 75% to be determined by Local Authorities will give flexibility and not necessarily cause delay. The Council supports Option 2.

The provision of First Homes is supported but needs to be tailored and balanced with an assessment of local need.

With regards to current exemptions from delivery of affordable home ownership products:

Q9: Should the existing exemptions from the requirement for affordable home ownership products (e.g. for build to rent) also apply to apply to this First Homes requirement?

Yes

The Council agrees that existing exemptions should also apply to the First Homes requirement.

Q10: Are any existing exemptions not required? If not, please set out which exemptions and why.

The Council considers that all existing exemptions are required.

Q11: Are any other exemptions needed? If so, please provide reasons and /or evidence for your views.

The Council does not consider any additional exemptions are required. We are concerned about the following paragraph 63: Further proposals are being developed for an Infrastructure Levy, which would replace CIL and Section 106 planning obligations. First Homes will remain integral to this approach, as will the delivery of affordable housing more generally. We will consider the balance of infrastructure and affordable housing as part of this approach.

If there is any suggestion that First Homes and the delivery of affordable housing have the potential to lessen or reduce infrastructure development this will be

unacceptable. Schools, transport, GP's and roads are still required if development is to be delivered.

Q12: Do you agree with the proposed approach to transitional arrangements set out above?

The District Council would need to agree to the transitional arrangements.

Q13: Do you agree with the proposed approach to different levels of discount?

Paragraph 59 highlights that the minimum discount for First Homes should be 30% from market price which will be set by an independent registered valuer and *the valuation should assume the home is sold as an open market dwelling without restrictions*. Taking the latest figures from the ONS for Cotswold District, the average earnings is circa £25,000pa, £3,300pa less than the national average. Meanwhile average house price is stated at £350,000, circa £79,000 above national average. Aiming for a single-earnings affordability ratio of 4:1, that would require housing at £104,000; while a joint-earnings ratio of 8:1 requires housing to come forward at £208,000. These prices represent approximately 40% discounts on the market rate. A 30% discount would not achieve the stated aim in this area.

(Source:<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2019> and <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian>)

If First Homes are to remain discounted when sold on how will this be achieved without future restrictions?

Q14: Do you agree with the approach of allowing a small proportion of market housing on First Homes exception sites, in order to ensure site viability?

No

As a rural community it would be good to see smaller sites made available for mixed First Homes and other affordable housing options. It is essential to retain the existing rural exception sites policy in designated rural areas, and not exclusively for First Homes.

Q15: Do you agree with the removal of the site size threshold set out in the National Planning Policy Framework?

No

The proposal that First Homes exception sites should be proportionate in size to the existing settlement is too general a control and would not necessarily reflect the housing need. Scale remains a key factor for a town such as Moreton-in-Marsh.

Q16: Do you agree that the First Homes exception sites policy should not apply in designated rural areas?

Yes

It is essential to retain the existing rural exception sites policy in designated rural areas, and not exclusively First Homes. As a rural community it would be good to see smaller sites made available for mixed First Homes and other affordable housing options.

Q17: Do you agree with the proposed approach to raise the small sites threshold for a time-limited period? (see question 18 for comments on level of threshold)

No

The proposed changes would reduce the amount of affordable housing that could be sought via housing policies in Local Plans, and would have a detrimental impact on the supply of affordable housing for a much longer period than 18 months.

Owners of sites with planning permission that have an affordable housing contribution could potentially reapply for planning permission to attain the affordable housing exemption. There is no indication of what the position would be following the 18 month limit.

Local communities need to remain sustainable and affordable homes enables local people to remain in the communities they grew up in. Affordable housing ensures that a range of employers have access to a workforce and therefore helps to support the growth of the local economy.

Q18: What is the appropriate level of small sites threshold?

i) Up to 40 homes

ii) Up to 50 homes

iii) Other (please specify)

The Council considers that existing thresholds should be retained. Developments of 40+ houses are major developments for rural areas, and could harm local character and sustainability if not delivered sensitively and with the necessary infrastructure and mitigations. This proposal is not suitable for rural areas.

Q19: Do you agree with the proposed approach to the site size threshold?

No

Q20: Do you agree with linking the time-limited period to economic recovery and raising the threshold for an initial period of 18 months?

No

The Council does not consider that the threshold should be raised.

The proposal would have a detrimental impact on the supply of affordable housing for a much longer period than 18 months. Owners of sites with planning permission that have an affordable housing contribution could potentially reapply for planning permission to attain the affordable housing exemption. The proposals fail to address the issue of land banking.

Q21: Do you agree with the proposed approach to minimising threshold effects?

The Council is concerned that the proposed raising of the threshold will encourage developers to artificially split larger sites into phases. There is no detail relating to how paragraph 81 in the consultation will be achieved.

Q22: Do you agree with the Government's proposed approach to setting thresholds in rural areas?

Yes

The Council agrees that the proposed approach to retain the current threshold in rural area should be retained.

Q23: Are there any other ways in which the Government can support SME builders to deliver new homes during the economic recovery period?

No suggestions to make.

Extension of the Permission in Principle consent regime

Q24: Do you agree that the new Permission in Principle should remove the restriction on major development?

No

There seems little point in giving permission in principle separate to the technical information Developers would need in order to proceed, particularly when significant environmental infrastructure issues might prevent the achievement of build completions. Separation between Permission in Principle and technical information deficit could lead to land banking by Developers and not build completion. It is not in the public interest to remove this restriction even if limited to 5 years. Once Permission in Principle has been granted, nearby householders will live with a

potential blight on the value of their homes and possibly an inability to move. Changing Permission in Principle will create uncertainty in local populations.

Q25: Should the new Permission in Principle for major development set any limit on the amount of commercial development (providing housing still occupies the majority of the floorspace of the overall scheme)? Please provide any comments in support of your views.

The demand in Moreton-in-Marsh is most often for residential development.

Q26: Do you agree with our proposal that information requirements for Permission in Principle by application for major development should broadly remain unchanged? If you disagree, what changes would you suggest and why?

It would be difficult for the local community to agree in Principle without being able to see and consider relevant technical information relating to proposed major developments. In a special landscape and AONB area this is particularly important.

Q27: Should there be an additional height parameter for Permission in Principle? Please provide comments in support of your views.

Surrounded by a special landscape area and half the Town being within the AONB and the High Street part of a Conservation area, height is important in terms of the context of building and details are significantly important in maintaining the character of Moreton-in-Marsh as a Place.

Q28: Do you agree that publicity arrangements for Permission in Principle by application should be extended for large developments? If so, should local planning authorities be:

- i) required to publish a notice in a local newspaper?**
- ii) subject to a general requirement to publicise the application or**
- iii) both?**
- iv) disagree If you disagree, please state your reasons.**

Disagree

The principles expressed in the White Paper state:

Para 108: We consider that local communities should have the opportunity to make representation on major development that might affect them.

Para 110: We plan to retain the current publicity requirements for statutory consultees and parish councils.

Increasing access to information is welcome however an over reliance on social media in the belief that it is democratic or cannot be influenced by external bodies (e.g. Russia/China/Other) is weak and does not constitute civic engagement. Under equality of access – this approach is questionable and any suggestion leading to lessening or reducing engagement at the parish level is not welcomed. Quick is not always better.

Q29: Do you agree with our proposal for a banded fee structure based on a flat fee per hectare, with a maximum fee cap?

This is a question for the Cotswold District Council to answer.

Q30: What level of flat fee do you consider appropriate, and why?

This is a question for the Cotswold District Council to answer.

Brownfield Land Registers and Permission in Principle

Q31: Do you agree that any brownfield site that is granted Permission in Principle through the application process should be included in Part 2 of the Brownfield Land Register? If you disagree, please state why.

The use of brownfield sites in preference to greenfield sites is supported but again the impact and implications for such sites need to be understood.

Additional guidance to support implementation

Q32: What guidance would help support applicants and local planning authorities to make decisions about Permission in Principle? Where possible, please set out any areas of guidance you consider are currently lacking and would assist stakeholders.

See the answer to Qs 24, 26, and 27. Without technical information relating to roads, education, water and sewerage and other essential infrastructure to support and mitigate any harm, there is no possibility of proceeding so why waste time giving Permission in Principle (even if only for 5 years), creating a blight and community uncertainty for the area? The White Paper para 118 is at fault in suggesting that detail is only important at a later technical stage of development in a rural area surrounded by a Special Landscape Area, with half the Town being within the AONB and a Conservation Area covering the town centre, details are important in order to judge whether a development proposal is achievable. Otherwise Permissions in Principle may be granted, subject to conditions that cannot be met, leading to a break-down in certainty of deliverability and public trust in the system. These details are critical if character and sense of place is to be retained for it to thrive in economic terms.

Instead, developers should be advised, or mandated, to seek pre-application advice from the Local Planning Authority. This will inform the developer what technical work

needs to be done to ensure a scheme can be brought forward in a timely and successful manner. Pre-application advice is a private affair between the applicant and the Local Planning Authority, so schemes with low merit do not unnecessarily alarm the public, and the armed with the advice and guidance, the applicant can present a full and detailed case to the Local Planning Authority at application stage, which can be processed speedily.

This is supported by Paragraph 39 of the National Planning Policy Framework: Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.

Q33: What costs and benefits do you envisage the proposed scheme would cause? Where you have identified drawbacks, how might these be overcome?

There are no apparent benefits to the proposed scheme as the ultimate cost of technical information would still need to be sought so why not up front at the outset? There is no solution to the uncertainty the proposed scheme would cause to communities.

Q34: To what extent do you consider landowners and developers are likely to use the proposed measure? Please provide evidence where possible.

A chance to bank land and wait for sites to increase in value may appeal to some Developers/Landowners. However if genuine Developers/Landowners want to build, they will know that no matter how much permission is granted in principle they will ultimately need to generate technical detail. A good pre-planning application process with stronger pre-engagement with Local Planning Authorities and local communities will lead to quicker agreement to full consent which would benefit local communities by removing uncertainty. See response to Q32.

The heart of the problem of why build completions are delayed does not rest with the planning system but with the infrastructure lag controlled by tires of local authority and private sector companies.

Public Sector Equality Duty

Q35: In light of the proposals set out in this consultation, are there any direct or indirect impacts in terms of eliminating unlawful discrimination, advancing equality of opportunity and fostering good relations on people who share characteristics protected under the Public Sector Equality Duty? If so, please specify the proposal and explain the impact. If there is an impact –

The use of social media and digitalisation of the planning application advertisement process and Local Plans should not discriminate against people who cannot afford to access a computer or a smartphone or do not have the skills to use them.



Moreton in Marsh Town Council

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Tel. 01608 651448

By email to Kathryn.haworth@gloucestershire.gov.uk

8th June 2020

A429/A44 INTERSECTIONS MORETON IN MARSH – TOWN COUNCIL CONCERNS

Dear Ms Haworth

The sending of this letter has been delayed owing to the COVID 19 emergency however the concerns raised in the letter will be more apparent once road usage returns to a more normal state. Whilst the new normal is difficult to anticipate, we can be sure that the impact of a number of proposed changes will affect traffic flow through Moreton in Marsh.

Noting the presentation to the Gloucestershire Environment Scrutiny Committee meeting 15th January 2020 the A429 Task Group Update, the Moreton in Marsh Town Council are interested in the update given in respect of Recommendation 8.

For some time Councillors have been concerned about the increasing traffic coming into the Town via the A44 from Oxfordshire, especially HGVs and the Burford Bridge weight restriction. During July 2019 Moreton Town Council responded to Chris Townley in the GCC TRO team to express our concern about increased traffic on the A44 and the impact on Moreton in Marsh of the proposed ETRO for the Adlestrop Bridge near Stowe on the Wold.

It is apparent that Oxfordshire County Council and the residents of Chipping Norton have a very clear view that traffic passing through Chipping Norton is significant and has a detrimental effect on air quality and health in the following examples:

- *Chipping Norton element of the Oxfordshire Local Plan (section 9.4.1) makes specific reference to traffic going to Evesham as well as heading south.*
- *Oxfordshire County Council Minutes 5 November 2019 ‘...route HGVs away from the town Centre, warning that the Tank Farm development could increase traffic by 50%. ...This Council requests the Cabinet to face up to the health and safety issues of residents of Chipping Norton and act on the previous LTP2 and LTP3 recommendations for a weight limit or indeed a lorry route.’ Following debate, the Motion was put to the vote and was carried unanimously (45 votes to 0)*

Whilst Oxfordshire County Council is seeking to actively address the concern of its residents can the same be said of Gloucestershire County Council in respect of the residents of Moreton in Marsh?

Point 9 of Task Group update in respect of Recommendation 8 suggests that GCC Officers and Councillors ‘...ensure that there is early discussion about proposals which might affect both authorities.’ In the Progress Update a further ETRO for a weight restriction on the A361 is acknowledged and reference to ‘...has the potential to route HGV traffic through Gloucestershire including on the A429’ is made. It is interesting to read that GCC and Oxfordshire have an ‘...aligned proposal for an ETRO for a weight restriction on the A436 in Adlestrop to protect Stowe on the Wold from HGV traffic.’ It is reasonable to think that when the ETRO is implemented the route for traffic will be to come through Moreton to join the A429 and so where is the protection for Moreton in Marsh from HGV traffic?

It is possible that GCC, working with Oxfordshire County Council, could be viewed as exacerbating traffic congestion and endangering the population of Moreton in Marsh by enabling increased traffic flows throughout the day and night, including HGVs, to pass directly through the centre of the Town onto the two mini roundabouts that are at capacity.

The introduction of a 20 MPH zone in the centre of Moreton in Marsh will also have the potential to adversely impact air quality if through- traffic increases.

Given the Town Councils previously raised concerns, including the capacity of the two intersecting mini roundabouts with the A44, and congestion on the A429 we request GCC to actively engage with the Moreton Town Council to:

1. Discuss/Notify the detail of any proposals to alter or regulate traffic flow on the intersecting mini roundabouts on the A44/A429 in Moreton in Marsh.
2. Discuss mitigation proposals which would impact on the traffic flow on the A429 and A44
3. Prove the two intersecting A44 mini roundabouts have the capacity for increased traffic flow when Oxfordshire County Council places a weight restriction on the Burford Bridge
4. Update Moreton in Marsh Town Council on the details of any road discussions and aligned proposals with Oxfordshire County Council and other authorities which have the potential to increase traffic through Moreton on the A429 and A44
5. Prove the width of the A429/A44 junction onto the London Road by the White Hart is wide enough for an HGV and tractor unit/trailer to navigate safely around the mini roundabout
6. Demonstrate to the Town Council the traffic modelling that supports ETROs being put into place on the A361 and A436 are viable and the impact on Moreton assessed before such orders are made. If the orders have been made please may we see the initial impact assessment for Moreton?
7. Provide traffic monitoring evidence from the A44 and A429 traffic flows
8. Discuss bridge weight restriction options for Moreton in Marsh
9. Discuss the introduction of AQMS in the Centre of Moreton on the A429 on the High Street.
10. Discuss the introduction of HGV length restrictions/restrictions on HGVs and Tractor Unit/Trailers on the mini roundabouts in Moreton in Marsh

Whilst GCC seeks to improve Lorry Advisory Route systems, this is not a solution to the immediate problems faced by Moreton residents today. It would be unthinkable to expose Town residents to any additional harm not impact assessed prior to ETRO implementation and so we seek the evidence as assurance for the residents of Moreton that this has been undertaken in respect of traffic flow, mini roundabout capacity, pedestrian safety and air quality.

There is a need for GCC to be accountable and transparent in its dealings with Oxfordshire County Council and residents in respect of our continuing concerns. Would it be helpful to try to meet to understand the GCC high level strategy for this area? If the Town had the means to support some of the plans we may have funding options from development that can be discussed and used efficiently and effectively.

We would be grateful for a response to the concerns raised in this letter and, as previously stated in the ETRO response copied with this letter, Councillors are willing to speak to you other Officers, possibly remotely, to understand the issues in depth. We look forward to hearing from you with a view to reaching an understanding and where possible resolution to some of these difficult issues.

Yours sincerely

Caroline Doran,

Clerk to Moreton in Marsh Town Council

Enclosure : Response to GCC ETRO Adlestrop Bridge

Please see below my written submission for the Planning and Licensing Committee Meeting to be held on the 14th October 2020 at 2 p.m.

Proposed Dunstall Farm, Fosseway, Moreton in Marsh Development by Spitfire Bespoke Homes Ltd. - Comments

I find it difficult to see any justification for this development at the present time, when:


1. No construction has started on the 67 dwellings in Evenlode Road
2. No construction has started on the residential development of 20 dwellings in Hospital Road
3. There are brown field sites elsewhere in Moreton in Marsh.
4. Past and present flooding of the area, since the flood in 2007 see pictures

If common sense is not followed and consent is given, I think the following changes should be made to the plans:

1. The current proposal of trees along the northern boundary will significantly impact the gardens and houses of Fosseway Avenue owing to their height causing increased shading, this shows little regard for the current residents. This should be changed so that trees selected are varieties with a mature height of less than the apex of current two storey buildings.
2. The size of the swales is increased to cater for the volumes of water recently seen to mitigate to some degree against flooding.
3. Access into and out of the development be improved. Although County Highways may have no objections, the plans do not minimise the risk of accident. Recently I was in a near accident turning right out of Fosseway Avenue, although the traffic was moving slowly, different drivers indicating to proceed and others merging from the petrol station created the perfect scenario for an accident. This same situation will be created with the new development and the Hospital/Doctors entrance. This is the opportunity to plan for the future and create a roundabout that not only will give safer access to the development but also the Hospital/Doctors and, at the same time, create a traffic calming feature. Not to do so would be extremely short sighted.
4. A cycle route should be included to avoid the A429 and give access to the town centre, school and railway station.
5. Foot paths at least as far as the Garden Centre on both sides should be included as well as a pedestrian crossing at the Garden Centre.

I would also appreciate that my objections and comments previously submitted are also reviewed and acted upon.

Regards
Rodney Lee
14 Fosseway Avenue,
Moreton in Marsh
Gloucestershire, G156 0DT





Field showing flooding in last 3 year



9/3/2016 flooding across the A429 where Aldi is now.