

**BLOCKLEY PARISH COUNCIL SUBMISSIONS ON
CALA HOMES PLANNING APPLICATION REF. 15/01020/OUT**

Blockley Parish Council strongly opposes the above application on the grounds outlined below. The Council urges CDC to give due weight and consideration to these representations and supporting evidence, and to refuse planning permission.

1. Survey Results

In March – April 2015 Blockley Parish Council undertook a parish-wide survey of parishioners' views regarding new housing development. This was based on the proposals in CDC's draft local plan document proposing 51 new homes on 3 sites in Blockley as part of the District's total housing requirement to March 2031.

The 3 sites are:

- 1) Land north of Sheafhouse Farm, Draycott Road (Little Shoe Broad) : CDC ref: BK5– 22 dwellings;
- 2) Sheafhouse Farm : BK8 – 13 dwellings;
- 3) The Limes, Station Road: BK14A – 16 dwellings.

Question 4a) dealt with site BK5: land north of Sheafhouse Farm, which is the subject of the current Cala Homes application. Parishioners were asked whether they supported or opposed CDC's proposal for 22 dwellings. A total of 265 replies were received, of which:-

- 219 (83%) opposed the proposal
- 46 (17%) supported it

Hence more than 4 out of 5 parishioners opposed the development of this site for 22 new dwellings.

The survey also asked for views on the size of new housing sites. The results were as follows. Because the number of respondents varied between the four parts of the question, percentages are not shown:

Size of site:	Yes, support Number:	No, oppose Number:
5 or fewer homes	190	42
6 to 15 homes	108	104
16 to 25 homes	27	173
More than 25 homes	15	187

There was considerable support for the 5 or fewer homes option. Most frequently, respondents supported this option, but opposed the larger size sites. However there was marked support for the 6 to 15 homes site option. Only 15 respondents supported sizes for more than 25 homes, whereas 187 opposed them. Responses regarding the 16 to 25 homes site option were almost as negative, with only 27 supporting but 173 opposing.

These results do not indicate a “Nimby” community, but rather one in which small –scale developments of 5 or fewer homes are widely supported, and large-scale ones are not. This reinforces the argument that a village such as Blockley should be allowed to continue to grow organically, successfully absorbing small-scale new development phased over the years, as it has done throughout its history.

The survey results also send a very clear message to Cala Homes and to Cotswold District Council: if a proposal for 22 homes, and sites in excess of 15 dwellings are overwhelmingly opposed by the parishioners of Blockley, an application for “up to” 33 dwellings (50% more than CDC’s figure) is totally unacceptable. This is a material consideration that should be given due weight.

2. SHLAA Site Assessments 2014

This level of opposition to the proposal echoes the public consultation in March 2014. 130 residents signed in on arrival at the meeting, and the estimated total attendance was 150. The numbers commenting on each site varied. In the case of site BK5, land north of Sheafhouse Farm (Little Shoe Broad) only 8 out of 55 respondents (15%) thought that the whole site was potentially suitable for development.

3. Housing Need

BPC has updated the Blockley Housing Needs Survey that formed part of the Parish Plan 2010, having repeated this survey in December 2014/ January 2015. The updated survey shows clearly:

- Only 19 households said they were in any type of housing need (13% of respondents). However, of those 19, 11 (58%) wished to move to a smaller property, and hence could not be described as being in urgent housing need. The remaining 8 households represent 5% of the 149 households that took part in the survey.
- 11 households currently owned their home outright, 3 rented from a Housing Association, and 2 from a private landlord. 2 had a mortgage on their home, and 1 respondent lived with a parent.
- 13 wished to buy on the open market, and 4 to rent from a Housing Association.
- Overall, the responses showed very limited housing need. Two groups emerged: 1. Elderly owner-occupiers (one person, or couples) who wished to downsize, and 2. Families with children who wanted larger accommodation.

The Parish Council is not aware of any comparable recent evidence of local housing need in Blockley, and would argue that district-wide statistics cannot and should not be used to justify local housing proposals.

4. Conservation Area Review

In 2014 Blockley Parish Council commissioned RPS Group, a leading European environmental consultancy, to undertake a review of the Blockley Conservation Area. The report was published in December 2014 and submitted to CDC to assist the District Council regarding its statutory duty to review Conservation Areas. The RPS report also formed part of BPC's representations on the CDC draft local plan that was out for public consultation until 27th February 2015.

The report concluded that the existing boundary "did not fully take into account the historic origins and development of the settlement, and consequently left out some key sites and almost all aspects of the village's setting". RPS recommended the extension of the boundary of the conservation area to include 21 additional areas.

The RPS report (pages 8-9, 28) made the following recommendations with regard to ancient sites that should be placed under conservation status, which have particular relevance to the Draycott Road site in this application, and to the houses on its boundary:

J Extend the boundary to include field north of Draycott Road. This field retains one of the last remaining coherent fragments of relict ridge and furrow cultivation on the village edge. This relict fragment contributes to the conservation area's special interest and preserves the relationship between the conservation area and the village's former open fields. ..."

K Extend the boundary eastwards along Draycott Road to protect village gateway, to include remaining orchard on south side, historic walls on both sides and unlisted historic buildings, all of which contribute to the village's special interest. Boundary to include Sheafhouse Barn and associated buildings, the modern Sheafhouse Grange and attached buildings and 1 and 2 Sheafhouse Cottages. "

The housing development proposed by Cala Homes would cause irrevocable and grave harm to the Blockley Conservation Area and the AONB.

5. AONB

Crucially, the site lies within the AONB. The recent Stow appeal decision, recovered for the Secretary of State's determination (ref: APP/F1610/A/13/2203411) reinforces the importance of this designation. AONBs have the highest status of protection in relation to landscape and scenic beauty. The decision refers to para. 115 of NPPF, which states that great weight should be given to conserving landscape and scenic beauty within AONBs.

The Stow appeal decision and Secretary of State's conclusions are important not least because they conclude that the appellant's reliance on the earlier appeal decisions at Tetbury and Bourton was flawed. These decisions "relate to their own specific facts", and "gauging impact on the AONB is an inherently site specific process". "Simple harm" to the AONB is occasioned by

the loss of green fields to residential development, but in addition, more in-depth analysis reveals "specific harm to the AONB caused by the impact of this development in this location on its landscape and scenic beauty."

BPC would also refer Cotswold District Council to the debate in the House of Commons on 5th March 2015, in which the Minister of State, Department for Communities and Local Government (Brandon Lewis) stated that:

"I stress that councillors should make themselves aware of all of the NPPF, not only the odd paragraph that their officers might sometimes drive them towards.For example, national parks and areas of outstanding natural beauty have a high status of protection in recognition of their landscape and scenic beauty. "

The Minister went on to say "... a core principle of the framework is that planning authorities should recognise the intrinsic character and beauty of their countryside. The characteristics of different landscape and the importance of ensuring that development is suitable for the local context should be recognised. ..."

Cotswold District Council's own draft local plan document (Local Plan Reg 18 Consultation Development Strategy and Site Allocations, January 2015) states at 7.22:

"... The level of importance of an asset and the significance of any feature that may be affected by a proposed development should be carefully considered and appropriate weight attributed to it. Even when development takes place without direct harm to the asset, it is important that the setting and potential wider area of influence is also protected. ..."

Blockley Parish Council urges Cotswold District Council to protect the AONB and to oppose Cala Homes' application on the grounds – *inter alia* - that the proposed scheme will cause significant and irrevocable harm to the AONB.

6. Highways

Cf. (Comments by BEAG on the Transport Statement (January 2015) produced by Banners Gate in support of the application by Cala Homes for the construction of 33 dwellings off Draycott Road, Blockley, Gloucestershire).

We use the paragraph numbering employed in the Transport Statement and comment seriatim:

2.2.1 Road network: There is no empirical basis for the assertion that "the village accommodates modest traffic flows associated with the village itself and nearby communities." The B4479 serves a number of local employment centres viz : The Northwick Park Industrial Estate, the Brickworks at Paxford and the Paxford Business Park. The B4479 also serves as a diversion for HGV's to and from the A44 to the junction with the Fosse Way A429 at Portobello Farm near Shipston on Stour to avoid the narrow highway conditions at Bourton on the Hill and the railway bridge congestion at Moreton in Marsh.

As the Transport Statement fails to provide a North Cotswolds context for the local highway conditions at Blockley we offer the following observations.

Blockley lies on, but largely to the west of, the B4479 which runs south to the A44 that links Moreton –in – Marsh and Evesham and northeast through Paxford towards Shipston on Stour and beyond to Stratford upon Avon via the A429 (Fosseway). Branching from it are three minor roads, one running north to Chipping Campden, the other west to the A44, giving a shorter route to Evesham and also a route to Draycott. Through the village of Blockley, the B4479 is subject to a 20mph speed limit, reflecting the restricted carriageway width, poor alignment and visibility, and in some places lack of a footpath.

Access to Blockley via the B4479 from Moreton is via a steep hill with no footpath, which is particularly dangerous for walkers, cyclists and horse riders.

As already mentioned, several employment areas in the vicinity of Blockley are served by the B4479, and heavy goods vehicles are a frequent form of transport on this inadequate, rural road. Because the road bisects the Blockley Conservation Area, there are no opportunities to realign the road or provide additional road space.

In order to identify local infrastructure requirements for their forward planning, CDC rely to a large extent on the Infrastructure Delivery Plan - Interim Report May 2013 produced by Arup. However the section on Blockley contains no assessment of the highways and road concerns that confront any substantial residential development in the village. Appendix D of the Evidence Paper Appendices November 2014 recommends that full transport assessments and travel plans will be required for the majority of planning applications. Travel plans may be appropriate in urban areas where there are opportunities to alter the modal choice, by encouraging a shift to other modes to that of the car, but this is totally unrealistic in Blockley.

The draft Gloucestershire Local Transport Plan 2015 – 2031 includes a section on the North Cotswolds, which includes Blockley, and provides a contemporary assessment of the highways and travel issues. Within the North Cotswolds only 41 % of work related trips start and end within the area, 63% of trips remain within the county, with the remaining 37% of trips divided between the West Midlands (predominantly Stratford upon Avon) and the South East (predominantly West Oxfordshire). The North Cotswolds has a limited choice of travel modes and as a result a larger proportion of trips are made by car. The mode share for car use is 5% higher than the county average with bus, bike and walking all recording lower proportions of use.

The document concludes “Modal shift away from the single occupancy car is pivotal in reducing congestion, although this is particularly difficult in this rural area. A specific concern for the North Cotswolds is the impact of freight movements, including those generated by adjoining authorities and their plans for freight movement. There are also concerns on key routes such as the A429 (Fosse Way) relating to the volume and speed of traffic. A pinch point at the railway bridge in Moreton –in – Marsh can restrict the flow of vehicles through the area.

The implications of this for Blockley are that the majority of the new residents will be driving out of the village for work related car trips, either on the B4479 eastwards towards Stratford upon Avon via the Fosse or westwards on the B4479 to the A44 and eastwards through Moreton

towards Oxfordshire. Basically this means that on the substandard B4479, there will be increased risk for both these new drivers, and others on the road of collision and injury. The precautionary principle surely suggests that these risks should be avoided.

The earlier version of the Gloucestershire Local Transport Plan published in July 2010 records: "Moreton –in – Marsh is located on the A429 linking Cirencester to Warwickshire. This route provides the only north south axis through the Cotswolds and is one of the heaviest used roads in the county, particularly leading into Moreton from the south. Previous development applications have concluded that both mini-roundabouts linking the A429 and the A44 will reach capacity in 2012. Any additional development in Moreton would increase pressure on the junction.

Technical Note 4107 April 2014 produced by Cole Easton Consultants at the request of CDC in connection with the Cala and Capita application at Moreton (approximately an additional 400 dwellings) concluded "The sensitivity tests undertaken for this Technical note have shown that the town centre mini-roundabouts cannot also accommodate predicted traffic from the more significant residential and employment proposals at the Fire Service College. The northern and eastern approach arms of the northern mini- roundabout are predicted to experience significant levels of queuing and driver delay as a result of the addition of these volumes of traffic."

Both through journey to work car trips and social and community visits, as Moreton provides Blockley with shopping, cultural and health facilities, additional large scale – development at Blockley will worsen the already adverse traffic conditions in Moreton which comprise delay, congestion, pollution and accident risk. On the basis of the precautionary principle, these risks should be avoided.

In conclusion the local transport network has no capacity to cater for additional large scale development at Blockley, and furthermore planned development at the neighbouring town of Moreton which is already experiencing difficulties would be exacerbated by additional development at Blockley. The highway and road safety concerns expressed here, and exacerbated by the heavy use of these roads by HGV's are common to all of the sites put forward by Cotswold District Council in Blockley, and it needs to be strongly emphasised that transport assessments and travel plans will not significantly alter these basis shortcomings of the local transport network so as to render these proposals acceptable.

2.2.3 The visibility splays at the junction of Draycott Road with Station Road are inadequate and there is no opportunity to improve these. This site would be served from Station Road and the junction with Draycott Road is a dangerous and difficult junction. The visibility to the right is restricted and the angle of this junction is extreme. Nothing could be done to re-align the junction as land around is all privately owned. Peak hour flows are already increased by school traffic to Blockley's primary school from adjoining villages and commuters to the various employment sites.

2.2.5 No indication is given of the composition of this traffic.

2.3.3 There are safety concerns regarding an increase in traffic that will be generated by the residential development. Current traffic conditions in and around the village centre discourage walking and cycling because of the dangerous highway conditions accurately recorded in this

paragraph. What is being proposed will exacerbate this, and introduce additional risk to pedestrians and cyclists as well as other road users.

2.4.1 The walking distances to the village shop and primary school is in excess of 800 metres, and is neither direct or convenient as asserted here and furthermore is not flat. HGV's with their robust protruding wing mirrors are a particular hazard for pedestrians because of the inadequate pavements. Contemporary experience is that other than those people living within a 400metre distance of the village shop and primary school, most people living beyond this distance use their cars for these journeys. Those living on the proposed new estate, will use their cars to travel out of Blockley, and will similarly use their cars for these local journeys.

2.4.3 Bus journeys as shown by the timetable displayed in the document are infrequent and not realistic for commuter journeys. The publication "Public Transport in Development" published by the Institution of Highways & Transportation specifies that development should be located within 400 metres of the nearest bus stop. This site is beyond that distance.

2.4.4 Rail travel is an option and essentially what is proposed here is a dormitory estate. It would be more sustainable, and avoid the harm to the AONB, if further development of this character – if needed for Moreton has already experienced a large amount of housing development with further planned including a major estate promoted by Cala – were located closer to the rail station. Cycling to Moreton station by commuters from Blockley is not a realistic option and observation at the station indicates that few commuters cycle to the station as compared with either Oxford or Didcot stations on the same line.

2.4.6 The community village shop is the initiative of the local community and was a response to the unsustainable location of Blockley, rather than a justification for further development. The business plan for the shop is predicated on increased purchasing from the existing residents and not on major residential expansion of the village. The purchasing power of the proposed residential development will produce only a marginal increase in expenditure.

3.1.4 As already described the additional purchasing power of the new residents will be only a marginal benefit to the community shop, the school is well subscribed and the bus service is already subsidised. BEAG are not opposed to additional development on a phased basis, on small sites but are opposed to inappropriate estate development to be occupied by commuters and is justified on the basis of illusory benefits to the existing village.

3.1.5 The development fails against each of the criteria set out in Policy CP5 Sustainable Transport and Policy and Policy TP1 Development and Highway Safety, and it is notable that the authors do not attempt to justify the development against these criteria.

3.1.6 The development fails to meet the NPPF test of sustainable development. It is likely that a significant number of the residents of the proposed development would commute out of the village to work. A Travel Plan is unlikely to encourage non-car modes of transport and it is likely that a common mode of transport for commuters is the private car.

3.2.3 The description of the pedestrian environment is totally misleading. The observed travel speeds based on the 85th percentile speed are near the 30mph limit, and given these speeds, the

pedestrian environment both in the vicinity of the application site and towards the village centre is not of such a safe standard so as to encourage major development (in excess of 10m dwellings).

4.1.3 Little weight should be given to the trip generation data derived by the applicant using the TRICS data base and used in the modelling, not least due to the limited number of comparator sites and that they appear to be on the edge of larger settlements, which are likely to have better public transport.

4.14 This appears to be an underestimate. Gloucestershire County Council's North Cotswolds Parking Review indicates that at Blockley vehicle ownership per property falls within the range 1.6 – 2.0 vehicles and on this basis the number of vehicles originating on the development will be between 53–66. The Transport Statement suggests that in the peak hour some 33–46 of these vehicles will be parked in garages or driveways. This is patently absurd.

4.2.2 The analysis is totally misleading and ignores the HGV traffic through the area already described. The authors have failed to establish the base line for traffic volume on the village roads and as a consequence estimates of the likely impact and whether it will be severe are pure conjecture.

4.4.2 Again the unsubstantiated proposition that Blockley has a convivial pedestrian environment is advanced.

4.4.3 The walking distances appear to be that of a fit, young adult rather than for example that of the elderly, parents with young children or adults carrying heavy shopping bags. Again the information seeks to mislead and convey a false impression.

4.4.5 Having sought to argue that the area in the vicinity of the application site has a convivial pedestrian environment, the applicants seek to urbanise this approach to the village by the suggested footway scheme, which is out of character with the rest of the village.

4.5.1 – 4.5.5 The objectives here are worthy but experience on housing construction sites elsewhere in the North Cotswolds is that conditions, particularly in respect of working hours are not complied with, and enforcement by the local planning authority is not stringent. It is also noteworthy that these paragraphs contain the only reference in the statement to large vehicles using the local road network.

4.7.1 – 4.7.2 BEAG considers that the public interest is not served by this remote dormitory estate in one of the most unique villages in the Cotswolds AONB that will detract from the character and appearance of the area and compromise the fragile tourist economy of the area for years to come. In the process it fails to meet the requirements of the NPPF to minimise journey lengths and to allocate planned development in locations that reduce greenhouse gas emissions and encourage sustainability.

7. Flood Risk

A section of the site lies within a flood zone. To an extent this has been addressed in Cala Homes' submission.

However Blockley Parish Council remains concerned that measures must be taken to mitigate any additional surface water run - off to the Blockley Brook. The underlying soil structure is, BPC believes, predominantly clay. This severely restricts the efficiency of soakaways as a potential solution.

The Parish Council is also concerned that the surrounding topography has a flood impact on this site. In certain weather conditions the fields above and beyond BK5 discharge surface water across the highway and onto the site. This needs to be fully accounted for in any surface water calculations.

8. Numbers

CDC's proposal is for 22 dwellings on this site; Cala Homes' is for "up to 33", ie. 50% more. Because it is an outline application for 16 affordable and 17 private dwellings, there is no certainty regarding numbers. CDC should therefore refuse the application.

Parishioners' opposition to CDC's proposal for 22 dwellings (4 out of 5 opposed), let alone 33, has been highlighted in section 1.

Cala Homes seek to justify that their proposal is not a large-scale development in the context of Blockley. The Parish Council strongly refutes this assertion. 33 homes would represent at a stroke 65% - two thirds - of Blockley's total new development for the period through to 2031 as proposed by Cotswold District Council. Hardly small-scale development phased over the total plan period. This is contrary to the Parish Plan and to the wishes of the great majority of local people.

However it would be wrong for a developer to argue that this was simply a "Nimby" reaction. The Blockley Parish Plan 2010 and recent parish surveys have shown that it is the size and phasing of development that are crucial. 60 dwellings over a 20 year period have been achieved in the past, and could be again, but NOT by means of estate-type large scale development, which results in a loss of neighbouring amenity and is totally inappropriate to the location within the AONB.

9. Community Involvement

The encouragement of 'Community Involvement' by both CDC and Cala is laudable.

What is not acceptable is the complete disregard for the community's opinion. In their introduction Cala state –

'This document has been produced with the aim of clearly and concisely highlighting the community consultation undertaken by Cala in respect of its proposals for the site.'

This is not entirely accurate. Throughout their submission Cala give little weight or consideration to the fundamental position of BPC and the wider community in Blockley.

The Parish Council considers that large-scale, "estate type" housing proposals are totally inappropriate for Blockley. This view is founded on the Parish Plan and is further reinforced by more recent community consultation – public open meeting, SHLAA assessment and consultation, green space consultation, housing needs survey and, most recently the BPC survey on proposed development to further inform CDC's emerging plan.

Cala have been made fully aware of this from the outset.

There are a number of points in Cala's submission which require comment –

Para 3.2. For clarification and accuracy - this was not a meeting with the Parish Council. It was an informal meeting with a number of Parish Councillors.

Councillors made it clear from the outset that BPC had major objections to the proposal –

- While not disputing the allocation of new housing BPC opposed developments of the scale which Banner (now Cala) proposed.
- It was stated that the aim was to preserve the balance by supporting several smaller developments dispersed over the plan period, rather than large, by local standards, one-off schemes.
- The Parish Council opposed any development on this particular site for a number of reasons including substandard road access, environmental and ecological value.

The major part of this section deals with minor issues. Scant reference is made to the essential view of the community as outlined above. The inference is that dealing with play space, a piece of footpath, housing density etc would render this an acceptable development. This was not and is not the case.

Within these minor issues Cala have 'cherry picked' detail in an effort to show empathy with community concerns –

- Inclusion of a small play area. Discussion was, in fact, about the absence of a large, flat kick-about space.
- Minor extension to a footpath – what is required is a safe road.

BPC have not raised objection to CDC proposed housing numbers across the plan period. The concern has been that future development should be small scale growth across the full plan period.

Para 3.4 Public Exhibition

The Parish Council were invited to attend this. The offer was declined – to quote from the relevant correspondence refusing the invitation –

‘The Council’s concerns raised at the meeting with Banner Homes on 12th November 2013 remain unchanged. Both the Parish Plan and the public consultation in March 2014 following the assessment of possible SHLAA sites in Blockley confirmed considerable opposition to large-scale housing development in Blockley.’

The decision not to attend was, in part, due to concern that ‘consultation can lead to manipulation’. To a fair degree such concerns are given credence by the content of para 3.2.

Understandably Cala have sought to impart positive spin in their efforts to demonstrate Community Involvement.

However, BPC have made significant efforts to fully understand the views of Blockley residents. This work has largely been carried out under the auspices of CDC seeking to inform their emerging plan – SHLAA, Green Space and Consultation on the recent Local Plan Reg. 18.

To summarise the relevant results for BK5 –

SHLAA

15% considered this site suitable. (8 out of 55 replies)

Green Space

Significant support to have this site designated.

Survey Mar/April 2015

83% opposed to development (from 265 replies)

Cala public event

11% considered this site suitable (1 from 9 replies)

BPC has completed all CDC requested consultation to help inform the emerging Local Plan.

This significant volume of work has been carried out freely by Councillors and volunteers from the Community. The clear objective was to provide factual evidence to enable CDC to produce a Plan which represented and incorporated the views of the community.

WHAT IS THE POINT OF CONSULTATION AND COMMUNITY INVOLVEMENT IF THE RESULTS ARE TOTALLY IGNORED?

It is our strongly held view that full consideration and support should be given to the views of the residents of Blockley

10. Planning Policy

- The application does not conform to the relevant development plan namely the saved policies of the Cotswold District Local Plan 2001 – 2011 adopted April 2006 nor the National Planning Policy Framework (NPPF).
- The proposals do not accord with the NPPF policy in Paragraph 14 by which plan- making and decision- taking should be guided in accordance with the presumption in favour of sustainable development.
- The NPPF (Paragraph 99) requires local plans to avoid development that would lead to “ increased vulnerability from the effects of climate change such as flood risk....changes to biodiversity and landscape “ If permitted the application would contravene this policy and the related policies (Paragraphs 100, 102, 103) as the site lies within highly vulnerable risk areas.
- The NPPF (Paragraph 115) requires weight to be given to conserving landscape and scenic beauty in Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The site lies within a designated AONB and the application if permitted would have a similar adverse effect on the character and appearance of the AONB as that proposed at Oddington Road Stow and dismissed by the Secretary of State and his Inspector (Ref : APP/F1610/A/13/2203411) because the visual impact would be high, permanent and adverse. Similarly, here the setting of Blockley would be compromised and, in this respect, the proposals for 33 dwellings would not conserve the landscape nor scenic beauty of the AONB, contrary to the aims of the NPPF.
- We consider that the public interest is not served by this remote dormitory estate in one of the most unique villages in the Cotswolds AONB that will detract from the character and appearance of the area and compromise the fragile tourist economy of the area for years to come. In the process it fails to meet the requirements of the NPPF to minimise journey lengths and to allocate planned development in locations that reduce greenhouse gas emissions and encourage sustainability.
- The NPPF (Paragraph 128) requires the applicant to describe the significance of affected heritage assets including any contribution made by their setting while paragraph 132 states “great weight should be given to the asset’s conservation.
- Paragraph 133 indicates planning consent should be refused unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. The application site is visible from listed buildings in Park Road, from the nationally designated Heart of England Way, Diamond Way and Monarch’s Way, and from many buildings within the Designated Conservation Area. Planning permission for the application would compromise the setting of the village and it’s several heritage assets and in so doing damage the key tourism economy.
- Paragraph 158 of the NPPF stresses the importance of using up-to –date and relevant evidence. In December 2014 the Blockley Parish Council updated the Blockley Housing

Needs Survey carried out as part of the Parish Plan process. The survey was delivered to every household in Blockley village and Northwick Park: a total of 665. The results were published in February 2015 and showed that Blockley was not experiencing any form of housing supply problems and that no requirement of the scale, type or phasing proposed in the application was justified based on the survey of objectively assessed need carried out by the parish council.

- The sustainability assessment carried out by the applicants exaggerates the sustainability status of the village and the flaws in this assessment are described in detail in the BEAG representations on the application.
- In terms of transport and traffic the impact of the proposed development will cause very significant harm because the village has narrow streets and narrow rural roads. There is limited opportunity to improve either because of the built structure and the Conservation Area with listed buildings that surround the village. There is a full assessment of the transport, traffic and sustainability issues created by this application in the representations already submitted to Cotswold District Council by BEAG and by Blockley resident and Gloucestershire County Councillor Moor.

Blockley Parish Council urges Cotswold District Council to give due weight and consideration to the evidence and submissions above, and to refuse the application by Cala Homes ref. 15/01020/OUT.

SUBMISSIONS BY BLOCKLEY PARISH COUNCIL
REVISED CALA HOMES PLANNING APPLICATION 15/01020/OUT

In response to the revised application by Cala Homes Blockley Parish Council wish state their continued strong opposition to the above application.

We attach a copy of our previous submission which we maintain remains fully relevant and pertinent to the revised application. This should still be considered in its entirety.

Additionally we wish to make the following additional/reinforcing comments.

COMMUNITY OPINION

First, and foremost, we urge you, again, not to discount the views of the Community. Full details of the community response to various consultations and surveys are given in our original submission.

Briefly, the most relevant conclusions were –

- In a statistically relevant survey 83% were opposed to any development on this site.
- The vast majority of respondents were against developments on site in excess of 15 houses.

NUMBER OF DWELLINGS

The Cala proposal is now for 'up to 23 houses'.

We are deeply concerned that this is little more than a strategy to obtain 'development' permission.

If Outline Permission is granted it will be significantly more difficult to deny a detailed application for greater numbers

It should be borne in mind that the size of this site is such that it could potentially accommodate substantially more dwellings.

AONB

Obviously, the site is within the AONB.

More specifically it sits on the south side of the Blockley Brook – an area largely undeveloped and unspoilt as Blockley has grown over many generations. There is no development approaching the scale or impact envisaged by this application.

A defining characteristic of Blockley is the gradual development of the 'north side' mirrored by the undeveloped 'south side'.

If this application is allowed it will have a permanent adverse impact on this undeveloped area.

It will also create a precedent which will, potentially, lead to further development and encroachment onto the south side of the brook.

Cala's submission quotes the CDC Landscape Officer – *'The river valley is a defining characteristic of the village and should be retained as an important landscape corridor'*.

It is surely inconceivable that this statement is in any way compatible with the proposed development.

In the Landscape and Visual Impact Assessment produced for Cala it is stated – *'The introduction of residential properties is not considered unfamiliar or uncommon features in the local landscape'*. We would argue most strongly against this. In this situation the proposed development would be unfamiliar and uncommon. Furthermore, it is outside the developed boundary of the village and would have a negative impact on Blockleys defined development character.

CONSERVATION AREA.

We refer to our previous comments and the independent review commissioned by BPC and submitted to CDC.

In response Cala have specifically commissioned a report to cast doubt on the report produced for BPC by RPS Group.

Suffice to say that the RPS report, whilst commissioned by BPC, was independent. The conclusions drawn by RPS during the drafting of the report were never discussed with BPC.

LAND SUPPLY

CDC currently have in the region of seven plus years housing land supply. Significantly in excess of the 5+ required.

This gives you the opportunity to be more discerning in you decisions when it comes to protecting sensitive sites within an AONB.

We fully appreciate the central government pressure which is being exerted. The consequence is that sites such as this are being considered. We believe that, in this case, consideration is only been given because it is available. This is no more than short term expediency. It does not represent good, sound planning and development policy or practice.

Just a few short years ago development on this site would not even have been dreamt of – let alone seriously considered.

In conclusion –

Blockley Parish Council requests CDC to give full consideration to this and previous submissions.

In particular we ask that you respect the views of the majority of our community and refuse the application by Cala Homes red. 15/01020/OUT

**Arreton House, Station Road, Blockley
Moreton-in-Marsh, Gloucestershire GL56 9DT**

27th October 2015

Mr Martin Perks
Senior Planning Officer
Cotswold District Council
Trinity Road
Cirencester GL7 1PX



Dear Mr Perks,

Re: Planning Application 15/01020/OUT – Land off Draycott Road Blockley

This letter represents the second formal submission by the Blockley Environment Action Group (BEAG). We thank you and Kevin Field for advising us of the new documents supplied by the Applicant and its agents in support of 15/01020/OUT (“the Application”).

We oppose the Application in its entirety on three bases:

1. The community of Blockley overwhelmingly rejects the proposed housing estate purporting to assist us and while there is no demonstrable local or regional need for housing development in Blockley of the kind proposed by CALA Homes. Furthermore, the village’s sustainability and its ability to support such schemes are grossly exaggerated.
2. The documents now comprising the Application bundle are so confused, internally inconsistent and self-contradictory that they are incoherent as a whole making an informed consideration of whatever might be proposed in the Application impossible.
3. Support of this Application would contravene numerous policies in the National Planning Policy Framework (“NPPF”), the Cotswold District Saved Local Plan (“Saved LP”) based on the Cotswold Local Plan 2001-2011 adopted in 2006, the Town and Country Planning Act 1990 (“TCPA”) and the Emerging Plan as represented by the Local Plan Regulation 18 Consultation paper (“LPR18C”).

In brief, it is plain that the Application does not accord with the Saved LP against which statutory determination should be made and it is only on the basis of material considerations that so tip the balance that exception might be made. The benefits associated with this scheme are few and far between while the harms caused by it are many. The material considerations in balance are so one-sided it cannot reasonably be propounded that the Application is sufficiently comprehensible and beneficial as to warrant exceptional cause for overturning the policies of the Saved LP and national planning policies to accommodate it. We urge you to recommend its refusal.

Much relevant evidence has been included in our earlier submission and a great deal of that has so far been overlooked or ignored by the Applicant’s additional documents uploaded from 6/10/15. To minimise repetition we will refer you for detailed evidential support to our earlier letter (“BEAG 20Apr15”) where relevant and this letter is intended to be read as an addition to and not a replacement for the earlier one.

A. BLOCKLEY'S HOUSING NEEDS & ABILITY TO ACCOMMODATE HOUSING ESTATES

Blockley is a village and its residents wish it to remain so - that's why BEAG was brought into existence by our community. As previously and frequently mentioned Blockley does not oppose growth but it will resist harmful exploitation through unwarranted housing estates.

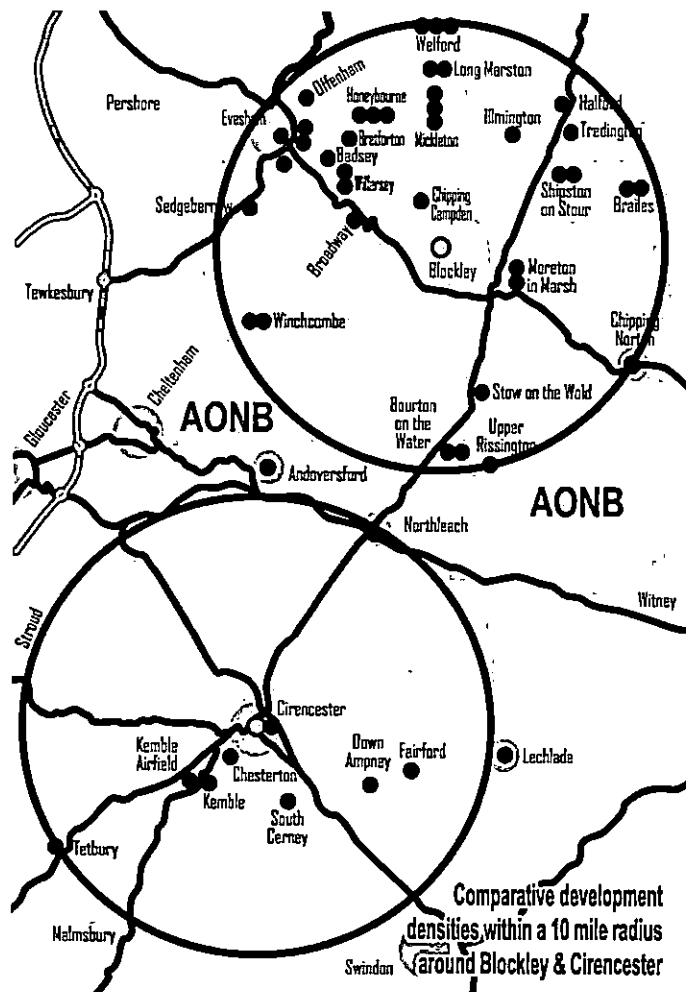
a. Blockley Needs

- i. The Applicant has not undertaken any local research into Blockley's housing needs whatsoever and all its calculations are extrapolated from top-down mathematical models. (BEAG 20Apr15, pp.10,11,39).
- ii. There are already an estimated 23 empty properties in Blockley (BEAG 20Apr15, p.9).
- iii. Blockley Parish Council ("BPC"), as required under Saved LP policy 21 to ascertain local need, has undertaken two recent extensive surveys of all households in Blockley the first of which showed only 19 respondents expressed any kind of housing need and the majority of those wanted to downsize. The second survey made plain that our community overwhelmingly opposed housing estates of 16+ dwellings like that proposed (BEAG 20Apr15, pp.12,13).
- iv. We have previously noted that the housing numbers proposed for Blockley could be delivered without the need for suburban style housing estates appended to our Conservation village. We also note that the CPRE in its formal submission to the LPR18C went much further and advised that the allocation for Blockley over its already built and approved sites should be reduced to only 20 dwellings commenting "this is a Conservation village". The CPRE further noted that its own proposed distribution would exceed (at 8,383) the CDC OAN of 7,600 dwellings but it did not reduce its calculation and allowed a safety margin should windfalls materialise to a lower than projected level.
- v. We note that it is policy within the CDC Local Development Framework that Parish Housing Needs Surveys take precedence over District wide surveys in determining specific parish housing needs (Affordable Housing Supplementary Planning Document Adopted February 2007).
- vi. Plainly there is no demonstrable local need for the kind of housing estate represented in the Application. Failure to take such evidence into account would contravene NPPF paragraphs 158, 159 and Saved LP policies 21, 19 and paragraph 3.4.24.
- vii. We have further reasoned at length (BEAG 20Apr15, pp. 2,19-22) that Blockley's sustainability has been grossly exaggerated and neither the Applicant nor CDC has yet addressed these concerns which were also reinforced by numerous public responses to the LPR18C.

b. Housing Need within Cotswold District

- i. It may be argued that CDC policy takes into account a greater regional need as well as any local need. We have already noted (BEAG 20Apr15, p.12) the Housing and Planning Minister's statement prioritising need over policy. *"Policy is absolutely clear that need does not automatically equal supply. I, too, want to be clear about that. Identifying housing need is the first step in the process. In effect, stage 1 is the need, unencumbered by policy, and stage 2 is about policy and environmental constraints."*
- ii. If considerable weight is to be given to a greater regional need at "stage 2" then it follows such need must be demonstrated. We would remind you of the CPRE's regional calculations foregoing.

- iii. CDC has further asserted that it is now able to demonstrate an adequate 5 year housing supply for the District. We suggest that success does not hinge upon Blockley's allocation.
- iv. The Housing and Planning Minister also issued a written statement on 21/7/15 which says: *"Local authorities cannot plan in isolation. They must work together to provide the land for the housing needed across housing market areas. The NPPF is clear that where local authorities cannot meet their housing needs in full, they should co-operate with other local authorities to do so. We will strengthen planning guidance to improve the operation of the duty to co-operate on key housing and planning issues, to ensure that housing and infrastructure needs are identified and planned for. It is particularly important that this co-operation happens where our housing needs are greatest."*
- v. The following map indicates the distribution of planned or likely housing within an approximate 10 mile radius of on the one hand, Blockley, an essentially rural community and, on the other hand, the administrative centre of Cirencester including the strategic new town at Chesterton. It is apparent some 12,884 dwellings are being put forward for construction across the relevant Local Planning Authorities ("LPAs") within 10 miles of Blockley and about 7,189 dwellings within 10 miles of Cirencester(cf. appendix for full details by settlement).



From consideration of the map's distribution and density at least six conclusions might reasonably be drawn if such development is allowed to proceed.

- i. The essentially rural character of the North Cotswolds will be destroyed and the NE section of the Cotswold AONB permanently blighted.
 - ii. The rural transport infrastructure in and around Blockley which is largely incapable of improvement will not be able to cope with such development and inter-district infrastructure requirements have not been adequately considered alongside planned housing distribution. The first dimension of NPPF 7 - the economic role - requires the provision of infrastructure and it is the core principle of paragraph 17. Paragraph 21 and 31 emphasize the importance of strategic infrastructure provision while paragraph 41 stresses the provision of infrastructure to widen transport choice while none is planned for Blockley.
 - iii. There are no local employment opportunities to service such development scale. On the contrary, the enormous amount of housing proposed in this district together with adjoining districts plainly shows there is no justification for providing estate development in Blockley as many of these house purchasers are likely to be working in the adjoining districts.
 - iv. Car commuting must increase exponentially. The travel to work data referenced in the Draft Gloucestershire Local transport Plan shows that a significant number of work journeys from the North Cotswolds area go to the Stratford-upon-Avon district, which has a growing employment base. Planning consent here would be in direct contravention of core NPPF Paragraph 7's third dimension defining sustainability, namely its environmental role to minimise pollution and move to a low carbon economy. Similarly it would conflict with the vision for Cotswold District set out in Policy 1 (1.7) in the Saved LP as well as Policy 19 (c), 36 (1), 37 and 38 and with Objective 5 of the LPR18C.
 - v. Aside from the lack of basic utility and transport provision there is no plan to provide adequate shopping, medical, educational, leisure and parking infrastructure to support such development scale as required by NPPF paragraphs 156, 157, 162, 177, 179 and 182. Nor can we see how such development can satisfy Saved LP 1.3.2 or 3.2.5 or Policy 18 or Section 5 Vision or Objective 4 or Paragraph 7.15 of SP3 in the LPR18C.
 - vi. The LPR18C together with subsequent planning applications indicate a number well in excess of the 7,600 dwellings proposed by the OAN within the Cotswold District area.
- vi. In consequence, we cannot see any argument that makes CALA's application necessary in order to deliver an urgent regional housing need and so justifying the overturning of the Saved LP.

B. FAILURE OF THE SUPPLIED DOCUMENTS TO REPRESENT A COHERENT APPLICATION

- a. 17 new additions to the application bundle have been made since 6/10/15. In large part they are crude cut-and-paste re-engineering amendments only to overcome objections raised in comments by our community and they make a mockery of the suggestion the Applicant has reconsidered the issues raised. We observe that only one previous document has been marked as superseded. It is unclear whether some of the other original documents are meant to have been superseded or whether they have components that are meant to be retained and so have not been marked as superseded. Our point is not vexatious and clearly affects material consideration.

- i. If such documents are meant to be superseded then there is inadequate information supplied to make a safe determination because necessary information has now been excluded.
- ii. If such documents are meant to be retained alongside newer documents then the Application is incoherent insofar as contradictory information is being put forward in the separate documents and anyone examining that information is required to arbitrarily infer which parts of such documents they should assume are still relevant and which are not.
- iii. For example, and at a very simplified level, Hunter Page's new Covering Letter document now asserts that the Application is for up to 23 dwellings but does not specify the type of dwellings. The original Application Form states there are to be up to 33 dwellings, comprising 17 Market Housing dwellings, 8 Social Rented dwellings and 8 Intermediate Market dwellings. So, the question arises; what is the number of Social Rented and Intermediate Market dwellings now? Is it 0 of either, 8 of each or some other permutation between 0 and 16 or possibly even up to 23 dwellings in such categories? The new documentation offers no clues and it is material because:
 - i. Blockley has no housing allocation in the Saved LP and development is generally excluded here under policy 18.
 - ii. The requirement to exclude open-market new build dwellings in Policy 19 is not satisfied. Nor does this Application satisfy the conditions about not materially increasing car-borne commuting or requiring development that does not harm the key characteristics of open spaces.
 - iii. Saved Policy 21 only permits development elsewhere when it does not result in new-build open market housing other than for Affordable Housing and then only after a local needs assessment has been conducted demonstrating local need for the type and number of proposed dwellings at the turn-out prices. The Application fails to meet this condition as it offers no evidence. SP6 of the LPR18C similarly endorses the aim of mixed communities as does the NPPF.
 - iv. The Affordable Housing Supplementary Planning Document Adopted February 2007 makes explicit (2.4 and PPS3) the requirement for affordable homes to remain so in perpetuity or for the subsidy to be recycled. The Applicant previously failed to fulfil this requirement in the earlier document bundle and makes no mention of it in these later revisions.
 - v. It will be argued that considerable weight should be given to the Emerging Plan where Blockley is nominated as a sustainable settlement allocated housing. The LPR18C is the latest issued expression of that emerging Local Plan where public consultation has been undertaken. The consultation cannot be described as complete until CDC have responded to public input and checked any outcome for soundness. As yet, it has not done so. There is only one certainty and that is the strategy going forward to form the Local Plan will differ from the unadopted LPR18C. To proceed on the consideration of evidence provided or commissioned by council officers to assess this application on what they judge will be the Local Plan while dismissing the relevant strategic evidence from the community as a matter to be addressed in due course (i.e. after this Application has been determined) is both unsafe as well as unsound decision-making.
- iv. It is the responsibility of the Applicant to be clear about its intentions so an informed and reasoned response may be made that any constraints to

development have been overcome. The bundle of documents representing the Application does not satisfy that requirement and it begs a series of questions.

- i. We assume that where an identically titled document is uploaded it should supersede any earlier version of that document?
- ii. Where an updated or amended document has not been provided we assume the original document's retention not marked as superseded indicates it is intended to form part of this Application?
 - a. As described earlier, the Application form is incompatible with Hunter Page's Covering Letter as well as several other documents dated from 6/10/15. Without it the distribution and density of dwellings across the site generally and by type cannot be ascertained. Without that information determination against Saved LP policies 18, 19 and 21 cannot be determined.
 - b. The Design and Access Statement produced by local architects Tyack now contains invalid data about design. We observe that having trumpeted the appointment of a local architect CALA appears to have replaced Tyack (once again) with their house designer malcolmpaynegroup. The Tyack document addressing how several constraints might be overcome and any such solutions are now invalid and they have not been replaced.
 - c. The Arboricultural Statement and Tree Condition Survey document dated September 2015 appears to supersede the Tree Survey dated March 2015. It references the Illustrative Site Layout to support its conclusions about diversity and protection. That Layout document appears to have been superseded by two Master Plans published on 9th and 14th October. Therefore the report's conclusions have been drawn without any sight of the Applicant's proposed Master Plan and they are unsafe.
- v. The principal problem with confusion and incoherence appears to stem from the Applicant's decision to replace the Illustrative Site Layout with the quixotically named Master Plan. It might more accurately be described as the pig-in-a-poke plan since it removes as much detail from the drawing as it can and what is intended is left almost entirely to the viewer's imagination. We surmise that it is so constructed either because there is no plan or because the Applicant wishes to obfuscate his intentions in order to avert critical comment. The national minimum requirement to provide only access detail in an Outline Application is varied by individual LPAs to allow for such additional information as will satisfy the number and nature of identified constraints. No doubt you, as the Case Officer, have advised the Applicant to provide such material as comprised the Application up to those documents uploaded before 23/5/15. The consequence of this minimalist Master Plan, like several other newer documents, is that it cannot demonstrate how it overcomes the identified constraints or is safe and so the Application should be refused.

C. COMMENTS ON UPDATED DOCUMENTS

a. Consultees Consulted 6/10/15

- i. We note that while the Applicant confirms it has passed the Archaeological Evaluation Report to the GCC Archaeologist he is not among the consultees and no mention is made by the Applicant of the Heritage Addendum Report, representing the conclusions drawn from that Evaluation Report, being passed on to him.

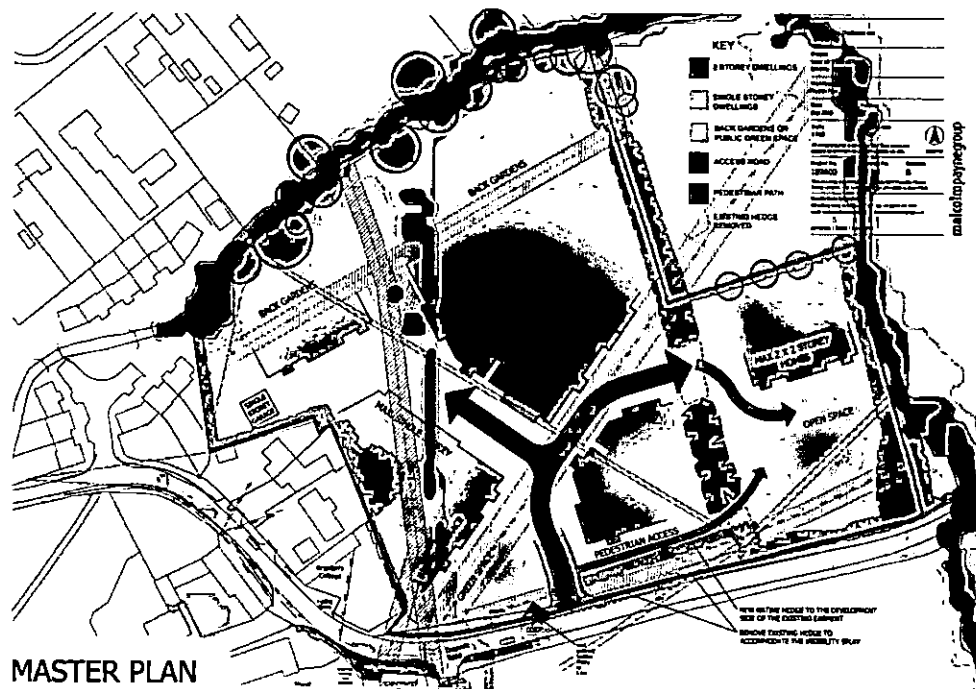
- ii. The GCC Hydrologist is not among the consultees. GCC is the Local Lead Flood Agency for the area and has direct responsibility for ordinary watercourses, surface water and groundwater. The Environment Agency has confirmed to us it is only responsible for flooding from rivers and the sea. As surface water flooding is a core threat here, we do not understand why he has been excluded and he will also have an interest in the quantum of maintenance costs as well as in how the proposed maintenance costs of any potential attenuation system should be apportioned.

b. Flood Risk Assessment 6/10/15

- i. The revised Flood Risk Assessment is essentially a re-presentation of the earlier document with some components expanded or inserted where previously they were absent because they had not yet been carried out. The FRA concentrates on the risks associated with fluvial flooding from Blockley Brook. There are very real risks associated with the brook especially if any built construction is allowed within its flood plain and the 1 in 100 year event risk areas. Nonetheless, the topography of the site and brook indicate that the extent of the area at fluvial risk is limited. However, it is what is missing from this FRA that is more pertinent to the inundation issues here. Surface water run-off and drainage continue to be inadequately addressed. Number references following are as in the latest Banners Gate document.
- ii. 1.6 & 1.7. Banners Gate continues to rely upon the Halcrow SFRA document dated 2008 to inform decision-makers of local Flood risks. It ignores our previous advice that CDC is using the more relevant JBA Report dated 2014 to inform its Local Plan. The Halcrow report is out-of-date and nor does it cover Blockley. As a consequence, significant information is excluded. The JBA report includes information about the 2007 floods which is omitted by Banners Gate. 39 houses in Blockley Parish were flooded then and half of those by surface water run-off. Full records information was passed to CDC at that time by the Blockley Brooks Action Group. JBA's report, aside from being more up-to date, includes detail for Blockley and specifically for this site, unlike Halcrow's. JBA emphasises the risk associated with pluvial flooding to property and roads including Station Road. (Draycott Road is acknowledged as a risk in the Applicant's FRA). JBA's traffic light system indicates Source Control as the only mitigation option given a green light. It further advises any site with a history of surface water flooding should include a comprehensive investigation into surface water flood risk within its FRA. Banners Gate has failed to do that. JBA advises this site is required to pass an Exception Test and undergo sequential planning to confirm development here is necessary. As shown earlier there is no local necessity for this kind of estate development. Nor, as shown earlier, is there housing necessity on a District level and, even if there were, then sequential planning on that basis would require investigation for alternatives on a district wide basis and there are many more suitable sites elsewhere as evidenced in the JBA SFRA report commissioned by CDC. It is unacceptable that the Applicant misleads decision-makers and other interested parties on flood risk by ignoring the updated JBA SFRA Report even after it has been notified in previous comments.
- iii. Our previous concerns about the Exception Tests have not been addressed and we understand the site is deemed to have passed it and, if so, we reiterate our request for the rationale as to how that was accomplished.
- iv. 1.7.19. When considering risk the Application must consider risk from all sources to determine whether mitigation is possible both here and elsewhere. This paragraph consists of what might be done but not what can be done. We do not

understand why the Applicant has failed to demonstrate how fluvial and pluvial floodwaters will impact on the drainage of the whole site. We would expect a strategy to start from analysis of the backwater effect.

- v. 1.7.21. The use of a combined sewer would exacerbate known issues in this area of sewage backing up.
- vi. 2.6.2. The phrase "during the detailed design phase" has been added. We contend knowledge of the location of the foul sewer is fundamental to determining whether the proposed development is feasible and should be ascertained prior to determination of the Application.
- vii. 2.7.1. We observe the words "High Probability" after Flood Zone 3 have been deleted to downplay risk.
- viii. 2.7.5. We reject the conclusion in this new paragraph which is based upon fluvial analysis. It is known that surface run-off follows these two routes and they are marked on the EA surface water map as representing High Risk. Paragraph 2.8.1 following has added the tributary as an acknowledged source of potential flooding. No consultation has taken place with the authority responsible for surface water flooding risk.
- ix. 4.1.2. This paragraph recognises the risks associated with structures like fences that might occlude the flow in Blockley Brook when in flood and so recommends hedges or open fences be provided to separate boundaries between properties. This is as unenforceable as recommending householders don't have sheds or any other built structures in their rear gardens or pile goods or materials there. If property boundaries are set within the flood plain of the Blockley Brook then increased risk of flooding is an inevitable consequence.
- x. 4.several. These advise of an indicative "Master Plan" appended and outline development proposals. We have taken the Master Plan and overlaid both the EA map for surface water and the Applicant's Constraints and Opportunities Plan from Appendix 4 of the FRA onto it. The resultant visual is set out below.



It is apparent that surface flood water, including high risk (dark blue), would flow right through the site, along its eastern borders and all over the proposed new

pedestrian footpath. The culvert regularly overflows and cannot accommodate the volume and velocity of run-off from the higher fields to the south. The proposed buildings to the north are, unacceptably, within 5 metres of the foul sewer. The foul sewer is located in back gardens as we have previously advised, contrary to the express request of Severn Trent, so precluding access for maintenance and repair. 4.3.1 assumes 35% of the development will be impermeable. That would appear to be an estimate of the likely floor space of built structures but it is totally misleading as a description of the permeability of land on the site. Additionally, consideration must be given to the nature of the soil variously described by the Applicant's agents as either Charmouth Mudstone or Oxpasture Association. Both descriptions denote predominantly clayey and seasonally waterlogged soils. The Applicant's own Agricultural Land Classification report notes the following:

"Texture and Wetness is the main limiting factor on the Site and it affects soil workability by restricting the time available for field work and grazing. Most of the soils have slowly permeable subsoils that restrict downward water movement at depth. Consequently workability of the heavy textured topsoil will be restricted after heavy rain in winter and spring when the soils are at field capacity (i.e. saturated). The field capacity period at this site is predicted to be 167 days."

We would emphasize the last point by the Applicant's agent that land here is saturated for almost 6 months of the year.

None of the options described in 4.4.2 are viable. Infiltration is impossible; reference JBA report and comments above. The level of flow into Blockley Brook will exceed the capacity permitted by Severn Trent and, as previously noted, discharge into the foul sewer is known to cause back-up locally. 4.4.3 pretends infiltration is possible before discounting it in the following sections – again, see above. 4.4.5 notes Land Drainage Consent may be required. We contend that should be gained before determination of the Application to see that is acceptable within the knowledge of the impact of other CDC proposed SHLAA sites nearby for containing flood risk elsewhere.

We note the risk at 1 in 30 & 100 year events exceeds permissible run-off rates. Consequently, the FRA proposes the least sustainable of all attenuation systems and proposes an estimated 515m³ of cellular storage crates. However, the site is waterlogged for almost half the year and the water table will be generally high so that there is every likelihood such crates could be sited within the water table and not above it. Until an analysis of the water table is undertaken there is no way of knowing such an option is viable. The history of the site, its soils and location near the base of the valley floor suggest otherwise.

- xi. 4.8 advises the culverted watercourse running through the site will have to be moved to accommodate the development but no demonstration is provided of where and therefore whether that can be achieved.
- xii. 5.5 Sequential and Exception tests. Banners Gate assertion that none is required directly conflicts with CDC's commissioned JBA SFRA report as described above.
- xiii. Any scheme put forward should also incorporate consideration of how run-off contamination will be prevented from entering this important ecological wildlife corridor. Banners Gate has failed to do so.
- xiv. In conclusion, it is plain that for flood risk consideration the Master Plan is unworkable as described and it is equally plain that the risks associated with drainage and surface water run-off have not been adequately examined to see

whether the constraints they represent can be overcome and there is no viable strategy in the FRA to achieve that. Consequently, the Application should be refused.

c. Artist's Impression 6/10/15

- i. This document is whimsy and cannot represent how the site will look as it describes very limited building types and omits the dwellings that would be visible according to the Master Plan on the left hand side of the drawing. Consequently, it has no meaningful value.

d. Master Plan 6/10/15

- i. We would remind you of our comments regarding policy under Section B foregoing.
- ii. Insofar as it is intended to assist in demonstrating how the constraints affecting development on this site might be overcome, the Master Plan completely fails. The Application must demonstrate that there is a workable concept that can overcome constraints.
 - i. We regret the need for some repetition. The Master Plan simply shows the locations where dwellings might be placed. With very limited exceptions it does not show the density of housing within the site or the actual location of individual buildings nor their size or height. Without such information the Visual Impact Assessment and its assumptions about visual impact are meaningless. The assumptions about dwelling layout in that document are clearly based upon the outdated Indicative Site Layout Plan and not the Master Plan which does not visualise individual buildings and, consequently, the conclusions it draws are invalid.
 - ii. The potential layout of the site for housing is heavily constrained by the water main that runs in a SW to NE direction and by the foul sewer main that runs W to E across the site as well as the ecologically important wildlife corridor running W to E alongside Blockley Brook. The Master Plan shows buildings that, unacceptably, are within 5 metres of the sewer according to the Applicant's own Constraints drawing.
 - iii. The sewer is shown in the back gardens contrary to Severn Trent's requirements and advice and precluding free access for maintenance and repair. There is therefore also nothing to prevent householders making built structures on top of that sewer.
 - iv. The culvert that runs S to N across the site must be moved but there is no indication of a viable alternative route. Allied to this issue is the need to provide over 500m³ of storm-water attenuation storage and there is no indication of where this might be located given ground saturation even if it were a viable solution.
 - v. Currently high flood risk surface water is shown running through the centre of the site where housing is located without any viable means of attenuation shown.
 - vi. The new footpaths opposite the site are shown in exactly the location where surface water flooding exits the fields to the south and crosses Draycott Road into the site.
- iii. In brief, the Master Plan, such as it is, is unworkable and so the Application should be refused.

e. Archaeological Evaluation and Heritage Addendum 6/10/15

- i. Paragraph 2.3 of the Addendum states that "A Written Scheme of investigation for the trial trenching, setting out the scope and methodology to be employed, has been approved by Mr Parry. Following completion of the evaluation trenching, the report will be provided to Mr Parry, and the Council. An appropriate programme of archaeological mitigation will be agreed which may be secured as a condition to any approval of the application."
- ii. The Archaeological Evaluation contains no such programme and on the contrary it appears not even to have completed the investigation. Paragraph 8.5 states "The rubble foundation (310) identified in Trench 3 is probably Roman in date despite the associated rubble spread containing Roman, Medieval and 18th Century pottery however no further interpretation is possible at this time. Areas with a high concentration of features (e.g. Trenches 2-5) may represent settlement activity within an agricultural landscape. However within the scope of the evaluation no further interpretation is possible."
- iii. This statement is totally unacceptable. Academic interest in this area has suggested the possibility that the remains of a Roman settlement were subsequently occupied by the Anglo Saxons and this land area may have been the original site of Blockley village. It is imperative that the archaeological evaluation be extended so as to properly date and uncover the Roman rubble foundation and to gain a full understanding of its value.

f. Additional Species Survey 6/10/15

- i. We have taken advice from bio-diversity professionals and incorporate their comments following. Page and section numbering are as in the Applicant's document.
- ii. Summary Page 2. We note that a tree on the site in which there was a crevice previously identified as suitable for roosting has now been removed and that 6 bat species were observed in the fieldwork.
- iii. Summary Page 2. The conclusion states the "development will not impact on these species as the corridor along the water course.... will be unlit and unobstructed." This is plainly untrue because:
 - i. There would be boundaries between properties creating barriers where presently none exist. There is also no means of preventing other subsequently built obstructions along the wildlife corridor in such back gardens.
 - ii. All such barriers would seriously impact on the free movement of wildlife currently using the unobstructed water course and banks which form the complete northern boundary of the site.
 - iii. Houses would create light sources which will disturb nocturnal creatures including bats. There would also be street lights and in all probability security and garden lighting where presently there are dark skies. Further, there would be noise disturbance from the movement of vehicles and from the human activity both during and after construction which will deter wildlife.
- iv. Summary Page 3. The Report states small mammals would be caught and released outside the exclusion fence which reflects a cavalier attitude towards their well-being. This Report should have included proposed arrangements to manage their safety and survival.
- v. Summary Page 3. The survey confirms the likely presence of reptiles and suggests "when the scheme is complete, all fencing will be removed and reptiles will be able to access the back gardens along the water course". This comment is absurdly disingenuous as reptiles are unlikely to hiss Schwarzenegger style 'I'll be

back' as they are carted off to the receptor area where they will be impacted by high levels of noise, light and other major construction disturbance and pollution and once such a large amount of their habitat has been destroyed as stated above. The most likely outcome for survivors, should there be any, is that they will move away. Perhaps that is why no proposals have been included to monitor any evidence of reptilian return?

- vi. Page 7 Master Plan. The drawing indicates the removal of large amounts of hedgerow along the southern boundary to facilitate the access routes and also internally between west and east sections of the site but proposes little mitigation for the destruction of such a large amount of valuable habitat.
- vii. Page 22 Conclusions. The statement about no impact on bat activity that is not credible is reiterated as is the reptile temporary housing arrangements. See above for rebuttal.
- viii. Page 23 Conclusions. It is inadequate to state simply that "it will be important to ensure that the water courses are not affected by the development, in particular from run-off during construction". The Application needs to demonstrate that the ecological dangers can be attenuated and it has not done so.
- ix. We have previously advised (BEAG 20Apr15, p.4) that the Application has to conform to EU regulations that require impacts resulting from incremental changes caused by other past, present or reasonably foreseeable actions together with the project to be taken into consideration. We are aware it will be generally argued that each Planning Application will be determined on its own merits but that is not to say there are no circumstances in which exception should be made. CDC's SHLAA proposals currently under consideration propose further development to the east of this site alongside Blockley Brook. As the presence of European Protected Species is admitted here it is necessary to demonstrate the site passes the three tests specified by the Habitats Directive and Conservation of Habitats and Species Regulations 2010 and as set out in the Natural England Advice Note: European Protected Species and the Planning Process in respect of protected species. We contend these tests are not met and would direct you to Case number CO/5712/2014 (*Westerleigh Group Limited v. Aylesbury Vale DC*) published 30/03/2015 where Mrs Justice Patterson determined on appeal that permission to develop a site was denied with regard to these and several other issues equally relevant to this Application.

g. Landscape & Visual Impact Survey 14/10/15

- i. The updated document resubmits essentially the same information as the original but it also adds 2 further Viewpoints 8 & 9 following comments from CDC Officers. Numbering references are as in the Report.
- ii. 1.0 The introduction describes the design concept for the development as "architectural arrangements to reflect the surrounding area". It is impossible to draw that conclusion on the basis of the Master Plan uploaded 14/10/15 and there is no other representation of architectural arrangement across the overall site that is still relevant.
- iii. 2.2 To indicate the attractive quality of the design, a layout is described that the Applicant has confirmed will not be built.
- iv. 2.4 ".....there does not appear to be any immediate intervisibility between the Conservation Area and the Site." This is plainly untrue as the following comments on Viewpoints 7, 8 and 9 demonstrate as do the missing viewpoints that should be included but have not been and which are described later.
- v. 2.5 The additional viewpoints are misleading, taken from disingenuous locations with the actual site obscured by trees and buildings in order to downplay visual

impact. Views from in-between the houses along Park Road and from the houses themselves clearly show that Landscape Sensitivity from these locations is Very High and not Medium as indicated. These views can also be seen from the LDWA Diamond Way to the west of Park Road. The view set out below is taken from Park Road and it plainly shows the profound detrimental impact and severe encroachment into the surrounding landscape that the development would really have.



View from Park Road Conservation Area with 'ridge & furrow' clearly visible.

- vi. Similarly, Viewpoint 7 is misleading and has been taken in such a way as to obscure the site with modern houses. Views along the LDWA Diamond Way further to the north show the site clearly visible.
- vii. 2.6 The final sentence reads "They (Blockley Parish Council) also consider that the loss of neighbouring amenity is totally inappropriate to the location within the AONB." We do not understand what this statement means.
- viii. 2.12 The proposals state there are "front and rear gardens which reflect the existing village character of Blockley". The Master Plan shows no formed back gardens of any kind of character and there are no front gardens at all shown on that drawing. This assertion is plainly nonsense.
- ix. 8.22 & Table 10 We reject the selected Viewpoints as being representative of the visual issues associated with proposed development on this site because of key omissions critical to any recognition of this site's role and value within the AONB. Holly Walk on Blockley Downs and the Broad Campden Road in the neighbourhood of Hangman's Hill farm have simply been ignored as Viewpoints yet these are the points from which the site becomes most visible from opposite ends of the Blockley valley landscape. The Blockley Conservation Area sits within its valley setting and setting is a key NPPF policy constraint (BEAG 20apr15 pp.5,6,29,30). When viewed from these higher Viewpoints there is enormous intervisibility of the site and the Conservation Area. Perhaps that explains their exclusion?
- x. 9.10 "Land to the West of the site!" is misleading and incorrect. It describes the "relatively recent development" of The Dell as forming the western boundary of the site and refers to other buildings between the Dell and Station Road. What it

omits to mention are the other buildings before the Dell. These are older, individual buildings of a more traditional character very clearly visible to the south of the Dell and more prominent from Draycott Road. They do exist and they are: Ganton Cottage, Sheafhouse Grange Sheafhouse Cottage, Sunnyhuckle Cottage and Sheafhouse Barn. We contend that the impact of the proposed development would have a very large impact on the area character had these properties been remembered.

- xi. 10.3 "the site contains few landscape features in the way of woodland or hedges that act as visual focal points." This is plainly wrong. One of the key landscape features of this site is the views to trees along Blockley Brook (see following photograph) that is a major visual facet of the site and that would be lost behind the proposed development.
- xii. 12.2 After a great deal of technical background the report summarises its findings. It describes the most successful mitigation as the development of a substantial landscape framework to reinforce existing retained hedges and trees. We cannot see anywhere in the Master Plan any indication of a substantial landscape framework and so the Report's claim is not empirical but plainly fantasy.
- xiii. 12.2 States "In this time span (15 years) any tree planting will have grown to over 8m high and any hedge planting, for example, will have now become a dense managed hedgerow". Aside from the fact that many tree species do not grow to 8 metres height, this statement is subjective and is not substantiated by the Master Plan or any other valid document in the Application. Again, the rationale is not empirical but plainly fantasy.
- xiv. 12.3 We cannot see how this ribbon development which impacts the view from designated National trails and from Grade 1 Listed Buildings whose owners have expressed their objection to this development for that reason and which is plainly obvious and extensive from the foregoing photograph can be described as having only small impact on the landscape character using the Table 5 rationale. We reject these conclusions as subjective, plainly determined only to justify development and objectively wrong. The site is on the gateway from Draycott into Blockley (recognised as important by CDC's own Conservation officers) with fine views to the riverine trees along the Blockley Brook. A suburban development of houses in front of this, no matter how disguised by new planting, will destroy the character of this landscape.



View of site showing riverine trees along Blockley Brook

- xv. Table 13. We reject the findings in this table as absurd. The Table is subjective, omits properties on Draycott Road, makes the indefensible and not credible claim that impact on properties on Draycott Road and Station Road would be negligible (rf. Cotswold Journal 19/8/15 for one example of not negligible impact). Most of all, it is nonsensical fantasy because the judgements made in it, as in so many other parts of this Report, are predicated on the illustrative Design Layout by

Tyack. We are conscious that local firm Tyack was similarly employed to help garner support for an Application in Moreton and once outline planning permission was gained the services of that architect were promptly dispensed with. The Applicant has confirmed Tyack's scheme will not be constructed and the Master Plan which is the only other valid visual scheme put forward for consideration does not describe any architectural and landscape scheme from which a Visual Impact Assessment could reasonably be constructed.

- xvi. As this report excludes important information, plainly misrepresents the views on which considerations should be based, is essentially subjective and fundamentally built upon a design scheme that will not be constructed it can only be unsafe and it cannot demonstrate that identified constraints can be overcome.

h. Transport Statement 19/10/15 & Response to Comments Re Transport 6/10/15

- i. Banners Gate has submitted two additional documents. The first, uploaded 19th October, has revised its application to support a development for up to 23 dwellings and the second is a response to the comments made by Dr Nigel Moor. We deal first with the updated Transport Statement and then assess the weight to be attached to their rebuttal of Dr Moor's comments. In addition, GCC Highways Development Management wrote to the Case Officer on 19/10/15 and we will also comment on their response.
- ii. **Transport Statement (September 2015)** – numbering as in their report:
- 2.2.1 There is no attempt to rebut the extensive criticism in our earlier representations of the local road network. Those inadequacies are just ignored by Banners Gate.
- 2.2.3 Similarly, there is no attempt to deal with the inadequacies of this junction.
- 2.3.3 Of the 3 injury accidents 2 took place in the last sixteen months.
- 2.4.1–2.4.6 Again, no attempt to deal with the specific concerns raised in our earlier representations, which are based on an assessment of the actual as opposed to assumed conditions.
- 3.1.5–3.2.3 Again, no response to our original criticisms.
- 4.1.3 We refer to our original representation which shows that GCC's North Cotswolds Parking Review indicates vehicle ownership in Blockley is in the range 1.6–2.0 vehicles. Banners Gate is seeking to minimise the likely traffic volume that would be generated from the proposed development.
- 4.1.4 The TRICS database may have been updated but our original criticism remains which is the selected comparator sites are on the edge of larger settlements more likely to have better public transport and so are invalid as they bear no resemblance to the Blockley environment.
- 4.2.1 See comments at 4.1.3 above.
- 4.2.2 On 15/10/15 CDC introduced for consultation Local Plan Reg 18: Planning Policies which shows at Map 2 a Blockley Development Boundary. Based on the council's own capacity estimates in the SHLAA the undeveloped land within the boundary, to the south of Station Road and north of Draycott Road, could accommodate some 51 additional dwellings. When taken together with the infill, rounding off and residential conversions that are likely to take place over the next 20 years, based on past trends, which could total an extra 60 dwellings, there is likely to be an increase of 111 dwellings, and possibly more. This will represent an increase of more than 10% of the housing stock, even based upon the inflated (i.e. Blockley parish not Blockley settlement boundary) figure of 1074 dwellings quoted in the Transport Statement. The traffic increase from this growth is significant and demonstrates the inadequacy of the Transport Statement in failing to deal with

the traffic implications of such growth. As a consequence, little credence can be attached to Banners Gate's traffic assessment.

4.4.2-4.4.5 Again, no attempt to deal with our earlier representations.

4.6.1-4.6.3 This is an attempt to persuade the local planning authority that an "x" distance of less than 2.4m at this junction is safe and acceptable. As explained below in our comments on the GCC response, normal highway standards are being relaxed. We know of no new development where such a limited "x" distance would be assessed as acceptable and it should be compared with the "x" distance of 2.4m proposed for the access onto the Draycott Road described at paragraph 4.3.2. The junction is clearly sub-standard and the Application offers no opportunity for improvement so as to provide an "x" distance of at least 2.4m when measured by means of accepted practice.

4.7.2 Road conditions in Paxford are, if anything, more congested than in Blockley so this suggestion offers no improvement.

4.7.3-4.7.5 We refer to our earlier representation concerning the difficulty of enforcing construction management conditions.

4.9.1-4.9.2 As regards the NPPF we deal with this in our comments below on the response prepared by Banners Gate.

iii. **Response by Banners Gate to the Comments raised by Dr Nigel Moor 28/4/15**

Description of the road network

- i. There is no attempt here to deal with the inadequacies of the local road network and instead a crude percentage estimate of the traffic increase generated by the proposed development is suggested, and the conclusion drawn that the increase is "de minimis ". However, as demonstrated above, this assessment fails to take into account the overall growth of traffic in the village likely to be generated by new residential development.
- ii. Banners Gate relies on 2001 Census data for travel to work using a car which shows Blockley is slightly lower than the Cotswold average of 61%. However, the draft Gloucestershire Local Transport Plan published earlier this year uses the later more relevant 2011 Census figures which show the North Cotswolds car travel to work figures to be 5% higher than the county average and car ridership figures also generally higher.
- iii. The 2011 data also show a much higher proportion of work trips using the private car across both Gloucestershire (69%) and North Cotswolds (74%), than in the Cotswolds area using 2001 data. This implies that the 2011 Census data for the Cotswolds journey to work by car and, similarly, for Blockley would be higher than the 61% quoted by Banners Gate. Plainly, using 2001 Census data is likely to underestimate the extent of commuting out by car from the proposed development.
- iv. As a consequence, Dr Moor's concerns about Blockley's sustainability are not speculative but based on the over-riding conclusion, which Banners Gate doesn't seek to challenge, that there is no real opportunity to change modal shift away from single occupancy by car for journeys to work. That conclusion challenges any assumption about Blockley being a sustainable location.

Traffic Impact

- v. Again, no attempt to deal with the detailed criticism in the original representation but a clumsy attempt to brush the criticisms aside. The basic point is existing infrastructure in Blockley and Moreton-in-Marsh is

inadequate to cater for the overall forecast demand. These proposals offer no capacity mitigation.

Visibility at the junction of Draycott Road and Station Road

- vi. This has been dealt with above. Additional development will increase the probability of an accident and the precautionary principle should be adopted and the Application refused.

Infrastructure and footway improvements

- vii. There is no contradiction between pointing out the minimum standards required for estate development and at the same time pointing out that these would be out of character at this visually important approach to Blockley. The footpath proposals now shown on the revised plan submitted P1025/201A might be quite acceptable in much of Gloucester and Cheltenham, but at this visually critical approach to the village (as acknowledged by CDC), they are out of character.

Summary and conclusion

- viii. The advice at paragraph 32 of the NPPF is noted but paragraph 37 of the same document points out the need to promote sustainable transport and to minimise journey lengths for employment, shopping, leisure, education and other activities. Banners Gate offers no suggestions as to how a modal shift away from the use of the car can be promoted. Essentially, this development will exacerbate the existing problems of an already unsustainable transport network.
- ix. As set out at paragraph 3.1.6 of the comprehensive BEAG submissions to the original application, the development fails to meet the NPPF test of sustainable development. This is an objection in principle which the current reduction in the number of houses proposed does not alter.

iv. Comments on the Highway Recommendations by GCC highways Development Management 19/10/15

Pages 1/2 Site Location and Local Highway Network

- i. These paragraphs greatly exaggerate the convenience of the site to bus stops and other facilities. See paragraphs 2.3.3–2.4.1 of our original submissions. The assertion that “the opportunities for sustainable transport have been taken up in accordance with paragraph 32 of the NPPF” is made without any corroborating evidence or consideration of the issues set out at length in our earlier representations.

Page 3 Extension of speed limit

- ii. It is noted that the Highway Authority wish the 30 mph speed restriction to remain at its existing location. This means that vehicles approaching the uncontrolled pedestrian crossing proposed on Draycott Road by the applicants will be travelling in excess of 30 mph. We contend this is dangerous and totally unacceptable.

Page 3 Development Impact

- iii. It is disappointing that the Highway Authority simply reproduce the 2001 Census figures quoted in the applicant’s Transport Statement and have not analysed the 2011 Census data which show an increased use of the private car for work trips across the county. As set out at length in our earlier representations there is no assessment of how a modal shift away from the use of the private car can be attempted at this location.

Page 4 Station Road with Drayton Road junction

- iv. It is noted that the Highway Authority are prepared to accept a visibility splay eastwards along Station Road from the Draycott Road junction when

measured 1.25m from the kerb line to the running lane of the approaching traffic as opposed to the normal practice of to the kerb line. The assertion is made that this is acceptable in practical terms as vehicles do not travel on the kerb line. This will come as a surprise to many people who, on a daily basis, experience large vehicles such as cars towing a caravan and HGV's doing just that because of restricted road width. In addition, there are cyclists who will ride close to the kerb line. As a consequence, a driver stopped at the junction will have a less than adequate view of the road looking eastwards, particularly if the view is obscured by pedestrians on the footpath over which the visibility line is measured. (rf. plan P1025/203). Again, we regard such a departure from normal good practice as self-serving and totally unacceptable.

D. SUMMARY CONCLUSIONS.

These revisions should be a reconsideration of the issues raised by community comments. To us they appear primarily to be concerned with tweaking documents to shimmy round planning policies and the reasonable constraints provided by the planning system to protect the visual and cultural diversity of England's heritage. In its attempt to do so we contend the Application demonstrates no great level of need to justify this development, so confuses its documentation in ill-considered and partial amendments that the Application, taken as a whole, is incoherent and self-contradictory. En route it contravenes numerous policies, a large number of which we have specified in this and in our earlier letter dated 20th April 2015. We suggest there are no material considerations in the Application that could reasonably justify the overturning of the Saved LP and so we urge you to recommend its refusal..

Yours sincerely,

Michael Reid

For and on behalf of Blockley Environment Action Group

cc.

Cllr Sue Jepson
Cllr Nick Parsons
Cllr Lynden Stowe

APPENDIX OVERLEAF

APPENDIX

Distribution & Density of Likely Housing within 10 Miles Radius of Blockley				
LOCATION & NAME	NO. OF HOMES	REFERENCE/VALIDATION	COUNTY	DISTANCE
Badsey	39	Taylor Wimpey website	Worcs	7.5
Bourton on the Water	138	Bloor Homes/Gloucester Echo	Glos	8.6
Bourton on the Water	50	Honeystones website	Glos	8.6
Brailes/Betty's Field	25	www.planitbrailes.com	Warks	9.5
Brailes	18	Warwickshire County Council planning website	Warks	9.5
Bretforton Village	40	Crest-Nicholson telephone & website	Worcs	7.2
Broadway	136	BBC.Co.Uk website	Worcs	4.3
Chipping Campden	127	Allocated in local plan	Glos	2.7
Chipping Norton	1806	West Oxfordshire Local Plan, table 9.3, pg 169	Oxon	10.0
Evesham/Blossom Fields	175	wam.wychavon.gov.uk	Worcs	10.0
Evesham/The Orchards	500	Multiple developers/via telephone call to Bovis Homes	Worcs	9.6
Evesham/Mountford Meadows	50	Website	Worcs	10.0
Evesham/Lavender Fields	300	Taylor Wimpey website	Worcs	8.8
Evesham/Offenham/The Larches	30	R. A. Bennett telephone	Worcs	9.6
Evesham/Abbey Vale	140	Bovis Homes website	Worcs	8.6
Halford	28	Cala Homes website	Warks	8.9
Honeybourne/Abcot Fields	33	David Williams Homes website	Worcs	6.2
Honeybourne/Bramble Chase	550	Honeybourne.co.uk website	Worcs	6.2
Honeybourne/Fair Acres	75	Website	Worcs	6.3
Illmington	11	Warwickshire website	Warks	5.9
Meon Vale	2300	Persimmon Homes website/www.meonvale.co.uk	Warks	8.4
Long Marston/Airfield site	3500	Cala Homes website/www.stratford.gov.uk	Warks	8.5
Mickleton/Shepherds Fold	79	Cala Homes website	Glos	5.5
Mickleton/Cotswold Edge	70	Newland Homes website	Glos	5.6
Mickleton/land off Marston Rd.	90	Gladman	Glos	5.7
Moreton in Marsh/Moreton Park	840	CDC figures (Cala/Bloor)	Glos	3.2
Moreton in Marsh/Cotswold Gate	140	Cala Homes website	Glos	3.3
Sedgeberrow	20	www.sedgeberrow.com	Worcs	8.7
Shipston on Stour/Norgren Site	250	Cala Homes website	Warks	6.4
Shipston on Stour/Shoulderway Lane	109	Warwickshire County Council website	Warks	6.8
Stow on the Wold	121	Allocated in local plan	Glos	5.9
Tredington?Newbold on Stour	30	www.tredingtonparishcouncil.co.uk	Warks	7.0
Upper Rissington	400	Bovis/Linden/www.upperrissington-development.co.uk	Glos/Oxon	9.3
Willersey/(Glebe land)	350	Daily Mail (15/10/15)	Glos	4.7
Willersey	85	Allocated in local plan	Glos	4.7
Winchcombe	92	Bloor Homes website	Glos	9.6
Winchcombe	120	Redrow Construction	Glos	9.6
Wellford/The Arbor*	20	Cala Homes website	Warks	10.1
Wellford/Hayfield Lawns*	18	Cala Homes website	Warks	10.1
Wellford*	100+	Proposed by various developers (Stratford Herald)	Warks	10.1
Total -	12884			

Further large developments between 10 & 20 miles distance				
Lighthorne Meadow (Gaydon)	3000	Stratford Herald (May 2014)	Warks	16.6
Stratford upon Avon	2500	Stratford Herald (various)	Warks	12.5
Total -	5500			

* outside 10 mile radius

Distribution & Density of Likely Housing within 10 Miles Radius of Cirencester				
LOCATION & NAME	NO. OF HOMES	REFERENCE/VALIDATION	COUNTY	DISTANCE
Cirencester	1037	Allocated in local plan	Glos	0.0
Cirencester/ Chesterton	2350	Wilts & Glos Standard (Sept 2015)	Glos	1.3
Down Ampney	54	Allocated in local plan	Glos	5.7
Fairford	442	Allocated in local plan	Glos	7.8
Kemble	70	Allocated in local plan	Glos	3.6
Kemble Airfield	2000	Wilts & Glos Standard	Glos/Wilts	5.0
South Cerney	155	Redrow Homes website	Glos/Wilts	4.2
Tetbury	763	Allocated in local plan	Glos	9.8
Lechlade*	114	Allocated in local plan	Glos/Wilts	12.0
Northleach	96	Allocated in local plan	Glos	9.7
Andoversford*	108	Allocated in local plan	Glos	11.1
Total -	7189			

* outside 10 mile radius



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Highways Development Management

Shire Hall
Gloucester
GL1 2TH

Martin Perks
Cotswold District Council
Trinity Road
Cirencester
Gloucestershire
GL7 1PX

email

Please ask for: Alison Curtis

Our Ref: C/2015/033712

Your Ref: 15/01020/OUT

Date: 19 October 2015

Dear Martin,

TOWN AND COUNTRY PLANNING ACT 1990 HIGHWAY RECOMMENDATION

LOCATION: Land Off Draycott Road Draycott Road Blockley Gloucestershire
PROPOSED: Residential development for up to 33 dwellings and associated works (Outline application)

The proposal seeks outline permission for 23 residential dwellings with the point of access to be determined now and all other matters reserved to a later stage. I refer to the Transport Statement October 2015 and drawings numbered 01A, P1025/201B and P1025/203.

Site Location and Local Highway Network

The site is located to the north east of the centre of the settlement of Blockley on Draycott Road. The site is currently green field, therefore all development trips will be considered as new to the network. The existing field gate is on the inside of the bend and within the 30mph speed limit.

Pedestrian footways vary through the village, with the facilities present in some areas and not in others. There are a number of narrow roads in Blockley where free flow of traffic is curtailed by the road geometry and parking. Some junctions are subject to restricted manoeuvring facilities and reduced visibility. However the safety record, discussed further later, is good.

The Cotswold Line Cycle Route 442 crosses Station Road to the north east of Blockley, there are no specific cycle routes within Blockley. Most streets are lightly trafficked and suitable for cyclists.

The bus stops are located on Lower Street routes 21 and 22 serving the stops provide links to Moreton in Marsh and Stratford upon Avon. The routes are suitable for providing journeys to work assuming a normal office hours working pattern. Mainline railway facilities are available at Moreton in Marsh. Given

the rural location of the village it is considered that the opportunities for sustainable transport have been taken up in accordance with paragraph 32 of the NPPF.

The site is located within 800m of the village shop and 1000m of the primary school with access to both along Draycott and Station Roads. This equates to a walking time of approximately 10 – 11 minutes.

The B4479 traverses the village on a north to south alignment providing efficient links to Chipping Campden, Moreton in Marsh and Stow on the Wold.

Draycott Road links the village to the A429 Fosse Way, 6km to the east of the village, passing through the villages of Draycott and Aston Magna. Although the road is tortuous at times, the junction with the A429 benefits from generous visibility suitable for the 60mph speed limit on the A429. A priority junction links Draycott Road with Station Road (B4479). Draycott Road in the vicinity of the site carries 662 vehicles per 24 hour weekday. 85th percentile recorded vehicle speeds were recorded as 27.6mph westbound and 28.9mph eastbound.

The recorded personal injury collision data shows five collisions in Blockley in the last 5 years of available data. Two slight injury collisions occurred at the junction of Draycott Road with Station Road, one of the collisions involved a vehicle pulling out into the path of another vehicle. In the other collision the vehicle clipped the back wheel of a cycle causing the rider to fall off. A serious collision occurred on St George's Terrace when a pedestrian running back to a parked vehicle was hit by a passing vehicle, this collision is not considered to be as a result of a highway defect, the overall safety record is considered good.

Non-Motorised Users Context Report

A Non-Motorised Users (NMU) Context Report has been submitted and adequately details the requirements of non-motorised users generated by this proposal.

Road Safety Audit

A Stage 1 Road Safety Audit (RSA) and designer's response has been submitted with the few issues raised by the Auditor suitably overcome by the Designer.

A Stage 1 Road Safety Audit (RSA), designer's response and exception report (if required) will be required for the internal layout at the Reserved Matters stage. Any safety issues identified will require resolving at the planning stage and the design should be altered and re-submitted to the Local Planning Authority.

Access onto existing highway

The proposed development is proposed to be accessed via a new access from Draycott Road. The location of the proposed access is at the eastern boundary of the settlement at the edge of the 30mph limit. A speed survey located at the west of the access to Sheafhouse Farm recorded the 85th percentile speeds of 27.6mph westbound and 28.9mph eastbound. Visibility splays of 38m and 42m respectively would be required. Splays of 2.4m by 60m and 2.4m by 90m have been illustrated on drawing numbered P1025/201, which are greater than those required by Manuals for Streets using the SSD formula.

A third party objector has commissioned a speed survey on Draycott Road to the east of the site which has recorded an 85th percentile speed of 41mph on the eastbound approach into the village. (It should be noted that the tabulated results of the ATC have not been submitted to the Highway Authority). Using the Manuals for Streets SSD formula with a reaction time of 2 seconds, and a deceleration rate of

3.68m/s splays of 82m are required. The access plan on drawing P1025/201A shows a visibility splay of 90m, this is in excess of the required splay.

The proposed access geometry includes a carriageway with a footway on the west side of the carriageway. A Swept Path Analysis of an 11.51m long refuse vehicle with an oncoming estate car with 0.5m clearance between vehicles and all vertical boundaries including kerbs has been submitted and is accepted.

Extension of speed limit

A suggestion is made within the Transport Statement that the existing 30mph limit should be extended east to reflect the new urban boundary of the development. However, visibility splays for the access can be achieved without the need to relocate the speed limit or introduce traffic calming measures therefore a planning condition or obligation cannot be secured for this as it would fail the legal tests.

Development Impact

The proposed trip generation has been predicted using the TRICS database, the selection criteria is higher than the population of Blockley, resulting in a higher trip generation and therefore represents a worst case scenario. TRICS outputs with a population selection criteria closer to that of Blockley presents a lower trip generation. Therefore the proposed trip generation is accepted as a worst case example.

The development is predicted to generate 15 vehicle trips in the AM peak hour (08:00 – 09:00) and 14 vehicle trips in the PM peak hour (17:00 – 18:00), with 115 vehicle trips predicted between 07:00 – 19:00. Draycott Road already carries 662 vehicles per 24hour day. This predicted level of vehicle trip generation is not considered to be severe in context of the existing traffic flows, and therefore is compliant with paragraph 32 of the NPPF.

Blockley has a higher than Cotswold average working from home ratio at 19% rather than 15%, trips by private car account for 60% of travel to work journeys compared with 61% across the Cotswold District and 59% across the south west region. 7% of journeys to work in the Blockley ward are on foot, with 6% as car passengers and 3% on bicycles. The vehicular trip generation flows above have not been reduced to reflect the higher proportion of working from home and is therefore a robust assessment of the impact of the proposed development.

Pedestrian Connectivity

As discussed above the pedestrian facilities in Blockley vary. The proposal seeks to improve the pedestrian facilities on Draycott Road and improve crossing facilities for pedestrians at the junction with Station Road. This route falls within the 30mph speed limit. The proposals are shown on drawing numbered P1025/201A (at Appendix D of the revised Transport Statement) and include a footway from the site to a crossing to the otherside of the road and past Sheafhouse Farm. This will then connect with the existing pedestrian facilities. Drawing numbered P1025/201B illustrates that 45m visibility splays from the proposed crossing points, this is acceptable.

The route to the village facilities would also include crossing Station Road as such improvements to the footway here are proposed, although no details have been submitted. Ideally these details should be submitted and agreed now but this aspect can be covered by condition.

Station Road with Draycott Road

Following the original submission of this planning application a number of objections were raised based on the impact of the development on this junction. Research carried out for MfS2 found no evidence of an increased risk of collisions as a result of non-provision of emerging visibility splays. (Paragraph 10.4.2 MfS2). Notwithstanding, the applicant's Transport Consultant has reviewed this junction. Whilst visibility is slightly impaired by boundary features when looking right from Draycott Road, 2.4m by 59m can be achieved when measuring 1.25m from the kerb line to the running lane of the approaching traffic. This is acceptable in practical terms as vehicles do not travel on the kerblines. In addition the forward visibility of approaching vehicles is good. The safety record of this junction was reviewed earlier and found no common causation factor for the two slight collisions recorded in the last 5 years. Traffic flows are light and there is no congestion at this junction.

Internal Layout

The internal layout is to be determined at a later stage therefore these comments are made for future reference.

Internal junction/private access visibility

Details of junction visibility throughout the layout are required and should be annotated on the submitted plan, commensurate with the design speed as detailed in Gloucestershire Manual for Streets. Emerging and forward visibility should also be checked from each dwelling access onto the highway.

Forward Visibility

Details of forward visibility around bends throughout the layout are required and should be annotated on the submitted plan, commensurate with the design speed as detailed in Gloucestershire Manual for Streets. Forward visibility around bends should be included within highway land.

Parking

Details of parking space widths, internal garage dimensions and parking aisle widths together with a parking schedule and details of visitor parking provision including justification for proposed level of parking based on Paragraph 39 of NPPF in the absence of any locally adopted parking policy. Parking spaces should be well located to the property they serve.

Street geometry

Details of all carriageway, footways/cycleways and shared surface widths annotated on plan, together with annotations to denote any changes in width. The widths are required to be appropriate to accommodate the expected vehicle movements and pedestrian/cycle flows wider footpaths will be appropriate outside local centres/schools etc. Ensure that footpaths/cycleways are of appropriate width, overlooked and lit if appropriate to ensure a secure and safe design.

Details of junction radii's to be annotated on plan.

Turning heads should be provided at the end of all streets (including private drives) that exceed 20m in length capable of accommodating the expected vehicles to access.

Vehicle Tracking

Details of vehicle tracking for an appropriately sized refuse vehicle* passing an estate car along all streets including, junctions with the existing highway and within turning heads with 500mm clearance to vertical boundaries including kerbs and between vehicles.

*The applicant should confirm what size refuse vehicle is expected to service the development in consultation with the relevant district council.

To avoid large bend radii's, it is acceptable that a car and a refuse do not have to pass each other on a bend, providing that adequate forward visibility is provided to allow drivers to be able see another vehicle prior to committing to the manoeuvre. Two estate cars should however be able to pass on bends and junctions, whilst a refuse vehicle and box van should be able to pass on a straight. This is dependent on the function of the highway and whilst acceptable for estate roads consideration should be given to spine roads serving large developments.

Service Vehicles

Service vehicles should not be required to reverse for more than 12m unless a straight alignment is proposed. Residents can carry waste upto 30m to a storage point and waste vehicles should be able to get within 25m of the storage point MfS 6.8.9. Although not ideal this can technically result in a cul-de-sac length of 55m without provision to accommodate turning for service vehicles for restricted sites. Bin collection points should be provided where large groups of bins will cause an obstruction to the highway ie at the end of shared drives or flats.

Shared Surface Streets

Shared surface streets encourage low vehicle speeds, create a pedestrian friendly environment, promote social interaction and make it easier for people to move around. Disabled people's needs should be considered and a traffic free route for these users should be provided so that this group is not disadvantaged. Shared surface streets work well where they form short lengths, cul-de-sacs and the volume of traffic <100 vehicles a hour.

Shared surface streets require greater planning for services, lighting, gateway features, on street parking as the layouts are often quite restrictive. Consideration should also be given to access from dwellings and the possibility of windows and porches over-sailing the highway and visibility along street edge at access points.

Recommendation

I refer to the above planning application received with Plan(s) Nos: 01A, P1025/201B and P1025/203. I recommend that no highway objection be raised subject to the following condition(s) being attached to any permission granted:

No development shall take place, including any works of demolition, until a Construction Method Statement has been submitted to, and approved in writing by, the local planning authority. The approved Statement shall be adhered to throughout the construction period. The Statement shall:

- i. specify the type and number of vehicles;
- ii. provide for the parking of vehicles of site operatives and visitors;
- iii. provide for the loading and unloading of plant and materials;
- iv. provide for the storage of plant and materials used in constructing the development;
- v. provide for wheel washing facilities;
- vi. specify the intended hours of construction operations;

vii. measures to control the emission of dust and dirt during construction

Reason: To reduce the potential impact on the public highway and accommodate the efficient delivery of goods and supplies in accordance paragraph 35 of the National Planning Policy Framework.

No dwelling shall be occupied on the development hereby permitted until details of the pedestrian footway and crossing facilities along Draycott Road and at the junction of Draycott Road with Station Road have been submitted to and approved in writing by the Local Planning Authority implemented in accordance with the approved details and are open to the public.

Reason: To ensure that the opportunities for sustainable transport modes have been taken up in accordance with paragraph 32 of the National Planning Policy Framework.

Details of the layout and access, (hereinafter called "the reserved matters") shall be submitted to and approved in writing by the local planning authority before any development begins and the development shall be carried out in accordance with the approved plans. No dwelling on the development shall be occupied until the carriageway(s) (including surface water drainage/disposal, vehicular turning head(s) and street lighting) providing access from the nearest public Highway to that dwelling have been completed to at least binder course level and the footway(s) to surface course level.

Reason: To minimise hazards and inconvenience for users of the development by ensuring that there is a safe, suitable and secure means of access for all people that minimises the conflict between traffic and cyclists and pedestrians in accordance with paragraphs 32 and 35 of the National Planning Policy Framework and Policy 38 of Cotswold District Council Local Plan.

No development shall be commenced until details of the proposed arrangements for future management and maintenance of the proposed streets within the development have been submitted to and approved in writing by the local planning authority. The streets shall thereafter be maintained in accordance with the approved management and maintenance details until such time as either a dedication agreement has been entered into or a private management and maintenance company has been established.

Reason: To ensure that safe, suitable and secure access is achieved and maintained for all people that minimises the conflict between traffic and cyclists and pedestrians in accordance with the National Planning Policy Framework Framework and to establish and maintain a strong sense of place to create attractive and comfortable places to live, work and visit as required by paragraph 58 of the Framework.

The details to be submitted for the approval of reserved matters shall include vehicular parking and turning facilities within the site, and the building(s) hereby permitted shall not be occupied until those facilities have been provided in accordance with the approved plans and shall be maintained available for those purposes for the duration of the development.

Reason: To ensure that a safe, suitable and secure means of access for all people that minimises the conflict between traffic and cyclists and pedestrians is provided in accordance with paragraphs 32 and 35 of the National Planning Policy Framework and Policy 38 of Cotswold District Council Local Plan.

The vehicular access hereby permitted shall not be brought into use until the existing roadside frontage boundaries have been set back to provide visibility splays extending from a point 2.4m back along the centre of the access measured from the public road carriageway edge (the X point) to a point on the nearer carriageway edge of the public road 60m to the west and 90m to the east (the Y points). The area between those splays and the carriageway shall be reduced in level and thereafter maintained so as to provide clear visibility between 1.05m and 2.0m at the X point and between 0.26m and 2.0m at the Y point above the adjacent carriageway level.

Reason:- To reduce potential highway impact by ensuring that adequate visibility is provided and maintained and to ensure that a safe, suitable and secure means of access for all people that minimises the conflict between traffic and cyclists and pedestrians is provided in accordance with the National Planning Policy Framework.

No works shall commence on site (other than those required by this condition) on the development hereby permitted until the first 10m of the proposed access road, including the junction with the existing public road and associated visibility splays, has been completed to at least binder course level.

Reason: To minimise hazards and inconvenience during construction of the development and for users of the development by ensuring that there is a safe, suitable and secure means of access for all people that minimises the conflict between traffic and cyclists and pedestrians in accordance with paragraphs 32 and 35 of the National Planning Policy Framework and Policy 38 of Cotswold District Council Local Plan.

Notes:

The applicant is advised that to discharge condition [user defined no. - GCC22]. that the local planning authority requires a copy of a completed dedication agreement between the applicant and the local highway authority or the constitution and details of a Private Management and Maintenance Company confirming funding, management and maintenance regimes.

The proposed development will involve works to be carried out on the public highway and the Applicant/Developer is required to enter into a legally binding Highway Works Agreement (including an appropriate bond) with the County Council before commencing those works.

Yours sincerely,

Alison Curtis
Development Co-ordinator