

Item No 01:-

17/00321/OUT (CD.9631)

**Land At Plum Orchard
Moreton Road
Longborough
Gloucestershire**

Development of up to 14 dwellings, public open space, landscaping and other associated works (Outline application) at Land At Plum Orchard Moreton Road Longborough Gloucestershire

Outline Application 17/00321/OUT (CD.9631)	
Applicant:	Mr M Stokes
Agent:	Hunter Page Planning
Case Officer:	Martin Perks
Ward Member(s):	Councillor Julian Beale
Committee Date:	10th May 2017
RECOMMENDATION:	PERMIT SUBJECT TO S106 LEGAL AGREEMENT COVERING CONTRIBUTIONS TO EDUCATION, PROVISION OF AFFORDABLE HOUSING AND OPEN SPACE

Main Issues:

- (a) Residential Development Outside a Development Boundary
- (b) Sustainability of Location
- (c) Affordable Housing
- (d) Impact on Character and Appearance of the Cotswolds Area of Outstanding Natural Beauty
- (e) Access and Traffic Generation
- (f) Ecology
- (g) Impact on Residential Amenity
- (h) Flooding and Drainage

Reasons for Referral:

This application has been referred to Planning and Licensing Committee at the request of Cllr Beale. He states 'There are strongly held, directly opposing views in the local community as to the principle of the proposal but in addition, there is a concern which I share regarding the infrastructural ability, especially the sewage system.'

1. Site Description:

This application relates to a parcel of agricultural land measuring approximately 1.59 hectares in size. It forms part of a larger agricultural field which extends to approximately 2.3 hectares in area. The site is located towards the north eastern edge of the village of Longborough. The northern boundary of the site adjoins a Class C highway (Moreton Road) which leads to and from the centre of the village. A native species hedgerow lies between the site and the aforementioned highway. To the north of Moreton Road is a line of post war detached dwellings.

The western boundary of the application site adjoins a Public Right of Way (HLO12) which extends in a north south direction along the western edge of the site. Immediately to the west of the Right of Way is a line of trees/woodland which defines the eastern garden boundary of a detached residential property (Upper Town House). The southern boundary of the site is open and adjoins agricultural fields. The eastern boundary of the site adjoins a recently completed residential development of 9 dwellings and the western edge of an employment estate. The eastern boundary largely comprises post and rail fencing and relatively young vegetation.

The site is located outside a Development Boundary as designated in the Cotswold District Local Plan 2001-2011.

The site is located within the Cotswolds Area of Outstanding Natural Beauty (AONB).

The site is located outside Longborough Conservation Area (CA). The western boundary of the application site lies approximately 40m to the east of the CA.

The site is located within a Flood Zone 1 as designated by the Environment Agency.

In terms of site topography the application site rises steadily from east to west. The site rises approximately 8m from its eastern boundary adjoining Plum Tree Close to its western boundary adjoining the Public Right of Way.

2. Relevant Planning History:

Application Site

None

Adjacent site (now Plum Tree Close)

10/00338/FUL Erection of nine dwellings Granted 2011

The above development was allowed as a rural exception site and comprises 100% affordable housing.

3. Planning Policies:

NPPF National Planning Policy Framework
 LPR05 Pollution and Safety
 LPR09 Biodiversity, Geology and Geomorphology
 LPR15 Conservation Areas
 LPR19 Develop outside Development Boundaries
 LPR21 Affordable Housing
 LPR34 Open Spaces & Play Areas in Res Deve
 LPR38 Accessibility to & within New Develop
 LPR39 Parking Provision
 LPR42 Cotswold Design Code
 LPR45 Landscaping in New Development
 LPR46 Privacy & Gardens in Residential Deve
 LPR49 Planning Obligations & Conditions

4. Observations of Consultees:

Gloucestershire County Council Highways: No objection

Gloucestershire County Council Highways Lead Local Flood Authority: No objection

Gloucestershire County Council Archaeology: 'The report on the archaeological evaluation confirms that there is low potential for any archaeological remains to be present on this site. I therefore recommend that no further archaeological investigation or recording should be required in connection with this scheme.'

Thames Water:

'Waste Comments

Following initial investigation, Thames Water has identified an inability of the existing waste water infrastructure to accommodate the needs of this application. Should the Local Planning Authority look to approve the application, Thames Water would like the following 'Grampian Style' condition imposed. "Development shall not commence until a drainage strategy detailing any on and/or off site drainage works, has been submitted to and approved by, the local planning authority in

consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed". Reason - The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community. Should the Local Planning Authority consider the above recommendation is inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Control Department (telephone 0203 577 9998) prior to the Planning Application approval.

Water Comments

Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

On the basis of information provided, Thames Water would advise that with regard to water infrastructure capacity, we would not have any objection to the above planning application.

Supplementary Comments

Waste - Thames Water has identified an inability of the existing waste water infrastructure to accommodate the foul water needs of this application. A developer funded impact study is recommended to enable us ascertain with a greater degree of certainty the impact of this development on the local wastewater system and identify any upgrade work required. Thames Water have no objection to the proposal outlined in "Flood Risk Assessment-Land South of Moreton Road, Longborough, Ref: CV8160293/CS/DW/016, Issue 2"; surface water discharged to existing ditch.'

5. View of Town/Parish Council:

Response dated the 21st February 2017

'Subject to there being satisfactory arrangements for the treatment of sewerage the parish council support the application for the following reasons;

- i) The provision of additional affordable housing had been identified in a recent housing needs survey for Longborough which was conducted by GRCC;
- ii) Introduction of new permanent residential dwellers will create sustainability and add vibrancy to a working village;
- iii) Promote the viability of key village amenities including village primary school, shop, public house and church community;
- iv) Create additional play space for young people/families.'

Response dated 11th April 2017;

'Re play space - The Parish Council would support in principle, acquisition of the adjacent field (approx. 1200 sq mtrs) from the current owners subject to a suitable agreement on contributions towards costs.

Re housing - Notwithstanding the comments from the planning authority regarding current demand for particular housing, and that we do not have access to the Housing Register; on the basis of the information and feedback from our parishioners, the Council feel that the mix of housing as set out in the original planning application would be more in keeping with the needs of the local community.'

6. Other Representations:

23 letters and petition signed by 72 people objecting to application. 48 letters of support received.

Main grounds of objection are;

- i) Overdevelopment of a small Cotswold village.
- ii) Hedging and trees will have to be cut back/down for health and safety reasons.
- iii) Affordable housing needs can be catered for by the Dunstall Farm development in Moreton-in-Marsh.
- iv) Loss of arable land.
- v) Application is outside the Gloucestershire Development Boundary. The previous development was an exception because it was for social housing. This proposal will start a precedent.
- vi) Extra strain on services and utilities.
- vii) Increased traffic. Longborough is already a rat run for traffic avoiding congestion in Moreton-in-Marsh on market day.
- viii) Proposal is market led and not in the interests of the village due to it being for affordable rather than social homes.
- ix) Development will destroy the natural ambience of a small Cotswold village.
- x) Proposed access is unnecessary as provision is already in situ within Plum Tree Close.
- xi) Traffic survey does not take account of traffic driving to the south easterly Charlesway junction just to the east of the site.
- xii) Majority of proposed dwellings are at a lower elevation than the Thames Water Main Village Sewers. Proposed development will need to be served by a private tank and pump system. The area adjacent to the playground has been subject to foul odours. Bromford Living are investigating the costs of installing a treatment unit in connection with their development at Plum Tree Close. There are unresolved sewage problems in the village.
- xiii) The proposal envisages a fundamentally urban which is inconsistent with the character of a small Cotswold village. The housing needs in the area are amply provided by a proposed development of 150 homes at Dunstall Farm 2 miles from Longborough. This development seems likely to increase to 500 dwellings. Forty percent of these are scheduled as affordable houses. There is demonstrably no need now or in the next five years for similar housing in Longborough.
- xiv) Previous development on adjacent site was allowed as an exception. This proposal cannot be regarded as yet another exception and should therefore be rejected.
- xv) Proposal does not meet the social or economic needs of Longborough. The community is not connected to neighbouring towns by a viable bus service of use to working people. The railway station at Moreton can only sensibly be reached by car adding extra traffic. Village shop cannot provide for a weekly shop meaning that future residents will have to leave the village to perform everyday tasks such as shopping and work. It will make Longborough a dormitory suburb which would conflict with guidance in the NPPF which seeks to support the transition to a low carbon future.
- xvi) The village and school would benefit from the open space but unless the freehold is transferred to the village I can have confidence that it will be retained.
- xvii) Since the 2014 Housing Needs Survey several of the 9 households who had indicated an interest in the private open market homes have withdrawn their interest.
- xviii) The proposal does not have the unanimous support of the Parish Council.
- xix) The development would continue to urbanise the approach into the village and have a significant adverse impact on the character and appearance of Longborough.
- xx) There are no economic or social benefits that are sufficient to outweigh the landscape impacts of the proposal.
- xxi) Building on the neighbouring site has destroyed much of the historic hedging.
- xxii) A new road will further impinge on local residents' peaceful enjoyment of the village as well as their privacy. Adverse impact of light pollution.
- xxiii) The proposal does not contribute to protecting and enhancing the natural, built and historic environment. This is amplified by the site being on a rising hillside.
- xxiv) Proposed new road would be dangerous on a busy road.
- xxv) The plans will result in three road junctions on a highway that is increasing in intensity and traffic.

- xxvi) The village is not dying on its feet. It is a vibrant place to live with lots of activities going on which are always well supported. More new houses do not guarantee that future occupants will support the shop, pub, church, school or any other event.
- xxvii) Speed, noise, frequency and numbers of traffic will increase. To date, no traffic calming measures have worked.
- xxviii) School will stand on its own merit and by increases in housing stock proposed in Moreton-in-Marsh. Only 8 children from the village attend the school and the rest are from outlying areas. It is the retired people coming into the village who undertake voluntary work, serve on committees and run the social events successfully.
- xxix) To develop this field further will detract from the beauty of this village as one enters Longborough and the field will be gone forever.

Main grounds of support are;

- i) I think this would be a fantastic addition for Longborough. As someone in their early 30's with long standing connections to the village and currently renting in Longborough. Prices are too high in the village to buy. Without developments such as this the situation will get worse. People starting out on family life will never be able to continue to live, contribute and bring new blood and future generations to the village. This type of proposal is vital to ensure the survival of Cotswold villages and the amenities we are lucky to have.
- ii) The development is a good proportion with plenty of proposed parking and plenty of green space which will maintain the community spirit within the village.
- iii) The Plum Tree Close development has brought new life to the village and a place where families can play together. The proposal is better than this and will bring a mix of people through different sized accommodation. The blend of rental, affordable purchase and private purchase brings new opportunity to enrich the village. Generous green space is really valuable for the village.
- iv) People who are opposed to the development say they want to live in a pretty, quiet retirement village and they want it kept frozen in time. However, we are in a housing crisis and we need more homes where local families aren't priced out of their communities. You can't simply say leave it to Moreton. We all need to contribute.
- v) I have lived in the village all my life, 80 years, and I think this development is a good idea and will help the village and local amenities.
- vi) In 2006 Longborough and Swell primary schools were recommended for closure. I was advised by a County Councillor that without children of school age Longborough would lose its school. Affordable housing was seen as a way forward especially given that two thirds of Longborough's previously rented homes had been sold off. Even with the proposed development Longborough will still fall short of its number of original rented sector properties.
- vii) To say that it is better for the village to bring external children into the village to use the school would be better than to provide homes for children to belong to the village is an absurd and superior attitude, especially for a village so concerned with traffic. Sadly a village with no children has no heart.
- viii) Longborough now has so many second or holiday homes that village life has changed. There are so many retired people whose dream has been to live out their final days in the Cotswolds which doesn't necessarily produce a vibrant village.
- ix) It will keep Longborough as an active working village rather than a fossilised retirement home.
- x) New dwellings are also needed to give the village continued life blood. In the past out of the allotments, orchards and rector's gardens development on Charlesway, Orchard Rise and Rectory Gardens grew. Without doubt, deprived of development Longborough would have lost its shop, school and pub decades ago. We shouldn't be afraid to embrace new blood. In 1853 655 people resided here. We have a long way to go to reach those numbers.
- xi) All of the village's family houses are being taken and converted so that they are priced well above market value. Longborough needs more homes to make it a viable village.
- xii) If something isn't done soon the village will have no shop or school like so many villages.
- xiii) Village is in desperate need of affordable housing for young families.
- xiv) The school is dying and there are not enough children in the village to make it viable.

Campaign to Protect Rural England North Cotswold District: Object - see attached

7. Applicant's Supporting Information:

Planning, Design and Access Statement including Affordable Housing Statement
 Ecological Appraisal
 Bat Activity Surveys
 Archaeological Geophysical Survey
 Flood Risk Assessment
 Foul Water Drainage and Utilities Assessment
 Statement of Community Involvement
 Transport Statement
 Heritage Desk Based Assessment
 Landscape and Visual Impact Assessment

8. Officer's Assessment:

Proposed Development

This application is seeking permission for the erection of 14 dwellings together with the creation of public open space, a new vehicular access and associated development. The application is in Outline form. Details relating to Access form part of this application. However, other details relating to Layout, Appearance, Scale and Landscaping have been reserved for later detailed approval should Outline permission be granted. The applicant is therefore seeking to establish the principle of development on the site. The submitted layout is purely indicative and intended to demonstrate how the site could accommodate the proposed level of development.

The proposed development will be split 50/50 between open market and affordable housing. Of the proposed dwellings 7 will be open market and 7 will be affordable. The open market dwellings will comprise 3 three bed dwellings and 4 four bed dwellings. The affordable units will consist of one, two and three bed dwellings. The tenure mix has yet to be formally agreed.

The indicative plans show the proposed houses being a mix of 1, 1.5 and 2 storey dwellings. New housing is shown extending approximately 80m to the west of Plum Tree Close and approximately 45m to its south.

Vehicular access to the proposed development will be via a new entrance onto Moreton Road to the north of the site. The proposed entrance will lie adjacent to the western boundary of the Plum Tree Close development which adjoins the north eastern edge of the application site.

A new informal play space is proposed on land in the north western corner of the application site. The remaining part of the field to the south of the proposed housing will be retained as grassland.

(a) Residential Development Outside a Development Boundary

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that 'If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.' The starting point for the determination of an application would therefore be the current development plan for the District which is the Cotswold District Local Plan 2001-2011.

The application site is located outside a Development Boundary as designated in the aforementioned Local Plan. Development on the site is therefore primarily subject to Policy 19: Development Outside Development Boundaries of the current Local Plan. Criterion (a) of Policy 19 has a general presumption against the erection of new build open market housing (other than that which would help to meet the social and economic needs of those living in rural areas) in locations outside designated Development Boundaries. The provision of the open market dwellings proposed in this instance would therefore typically contravene the guidelines set out in Policy 19. Notwithstanding this, the Council must also have regard to other material

considerations when reaching its decision. In particular, it is necessary to have regard to guidance and policies in the National Planning Policy Framework (NPPF). Paragraph 2 of the NPPF states that the Framework 'is a material consideration in planning decisions.'

The NPPF has at its heart a 'presumption in favour of sustainable development'. It states that 'there are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles'. These are an economic role whereby it supports growth and innovation and contributes to a strong, responsive and competitive economy. The second role is a social one where it supports 'strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations'. The third role is an environmental one where it contributes to protecting and enhancing the natural, built and historic environment.

Paragraph 8 of the NPPF states that the three 'roles should not be undertaken in isolation, because they are mutually dependent'. It goes on to state that the 'planning system should play an active role in guiding development to sustainable solutions.'

Paragraph 47 of the NPPF states that Councils should identify a supply of deliverable sites sufficient to provide five years' worth of housing. It also advises that an additional buffer of 5% or 20% should be added to the five year supply 'to ensure choice and competition in the market for land'. In instances when the Council cannot demonstrate a five year supply of deliverable housing sites Paragraph 49 states that the 'relevant policies for the supply of housing should not be considered up-to-date'.

In instances where the development plan is absent, silent or relevant policies are out-of-date the Council has to have regard to Paragraph 14 of the NPPF which states that planning permission should be granted unless;

- ' - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
- specific policies in the Framework indicate development should be restricted.'

In the case of sites located within the Cotswolds Area of Outstanding Natural Beauty the second bullet point above is applicable by virtue of Footnote 9 accompanying Paragraph 14.

With regard to housing land supply the last annual 5 year land supply review dates from May 2016. The review stated that the Council could demonstrate a 7.54 year of deliverable housing land at that time. More recently the availability of housing land was considered during the Public Inquiry in respect of a proposal for up to 69 dwellings on land off Berry Hill Crescent, Cirencester (Appeal Ref APP/F1610/W/16/31441133 CDC Ref 15/03539/OUT). The Planning Inspector and Appellant did not contest the 7.54 year figure and the appeal decision issued in September 2016 confirmed that the Council could demonstrate the requisite 5 year supply of housing land. In addition, in December 2016 a review of the Objectively Assessed Need (OAN) for housing in Cotswold District was issued. The review assessed potential future housing needs for the District in the period up to 2031. It does not recommend that the Council's current proposal to provide 8,400 dwellings (420 dpa) in the period 2011-2031 needs to change.

In light of the above, it is considered that the Council can demonstrate a robust 5 year supply of deliverable housing land in accordance with Paragraph 49 of the NPPF. Policy 19 is therefore considered not to be automatically out of date when assessed Paragraph 49 of the NPPF. However, in the case of recent appeal decisions relating to the erection of 90 dwellings on Land to the east of Broad Marston Road, Mickleton (APP/F1610/A/14/2228762, CDC Ref 14/02365/OUT) and for up to 71 dwellings on land to the south of Collin Lane, Willersey (APP/F1610/W/15/3121622, CDC Ref 14/04854/OUT) Planning Inspectors have considered that Policy 19 is 'out of date' by virtue of the fact that the policy was 'time-expired, conforms to a superseded strategy, fails to reflect the advice in the Framework (NPPF) in severely restricting rather than significantly boosting the supply of housing and conflicts with the emerging strategy.' In light of the aforementioned appeal decisions it is considered that little or no weight can be given to Policy 19 at the present time. Consequently, an application for new residential

development should be assessed on its individual merits having regard to the planning balance whereby the impacts and benefits of the proposal would be weighed against one another.

In addition to the above, it must also be noted that, even if the Council can demonstrate the requisite minimum supply of housing land, it does not in itself mean that proposals for residential development outside existing Development Boundaries should automatically be refused. The 5 year (plus 5%) figure is a minimum not a maximum and as such the Council should continually be seeking to ensure that housing land supply stays above this minimum in the future. As a result there will continue to be a need to release suitable sites outside Development Boundaries identified in the current Local Plan for residential development. If such sites are not released, the Council's housing land supply will soon fall back into deficit. It is considered that the need to release such sites represents a material consideration that must be taken into fully into account during the decision making process.

Notwithstanding the current land supply figures it is necessary to have full regard to the economic, social and environmental roles set out in the NPPF when assessing this application. These issues will be looked at in more detail in the following sections.

(b) Sustainability of Location

Longborough is not designated as a Principal Settlement in the current Local Plan. In addition, it is not identified as one of the proposed 17 Principal Settlements in emerging Local Plan documents. Notwithstanding this, the village does have a number of facilities such as a primary school, village shop/café, public house, church and employment estate. It is also home to a cricket club and to Longborough Festival Opera. The village shop and primary school are located approximately 250m and 310m respectively to the west of the proposed vehicular entrance to the application site. Premises on the employment estate are located between 100m and 320m to the east of the application site. There is a bus stop located in the centre of the village (located approximately 350m to the west of the site). Services operating from the village are limited to single return journeys between Bourton-on-the-Water and Moreton-in-Marsh and between Oddington and Chipping Norton both on a Tuesday; a single return trip between Broadwell and Stow-on-the-Wold on a Thursday; a single return trip between Oddington and Chipping Norton on a Wednesday and a single trip to Stow-on-the-Wold/Chipping Norton also on a Wednesday. Whilst bus services are limited it must also be noted that the site is located just under 5km from the mainline railway station in Moreton-in-Marsh. Connections to London, Hereford and Worcester are available from the railway station. Alternative modes of transport for longer distance journeys are therefore available within reasonable distance of the village.

With regard to facilities within the village, the site is considered to be within reasonable walking and cycling distance of the main facilities on offer in the settlement. Guidance in Manual for Streets (Para 4.4.1) states that 'walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes (up to about 800m) walking distance of residential areas which residents may access comfortably on foot.' The shop, school, public house, employment estate and bus stop are all within the aforementioned distance.

Whilst there is a modest gradient leading up from the site to the village it is considered not to be of a level that would deter people walking or cycling to the village centre from the site. In addition, the applicant is proposing to introduce a new formal pedestrian route within the existing field that will provide a link from the proposed development to the existing Public Right of Way running alongside the western boundary of the application site. The new path will extend for approximately 120m and will reduce the length of highway that future residents would need to walk along in order to reach the village centre. It is considered that the site is located sufficiently close to a range of services and facilities so as to reduce dependence on the use of the private motor car.

With regard to the emerging Local Plan, it is of note that new draft Policy DS3 seeks to be supportive of small scale residential development within villages. It states the following;

Focussed Change Ref FC022

Policy DS3 Small Scale Residential Development in Non-Principal Settlements

1. In Non-Principal Settlements, small-scale residential development will be permitted provided it:
 - (b) demonstrably supports or enhances the vitality of the local community and the continued availability of services and facilities locally.
 - (c) is of a proportionate scale and maintains and enhances sustainable patterns of development;
 - (d) complements the form and character of the settlement;
 - (e) does not have an adverse cumulative impact on the settlement having regard to other developments permitted during the Local Plan period; and
2. Applicants proposing two or more residential units on sites in Non-Principal Settlements should complete a rural housing pro-forma and submit this with the planning application.

The above draft policy may be subject to change as a result of the ongoing plan process and consequently carries limited weight at the present time. However, it does show the direction of travel of the new plan and it's in principle support for small scale residential development within villages such as Longborough.

In addition to the above it must also be noted that the Council's future housing needs will not be met solely through allocated sites. The Council will also need to ensure that a number of windfall sites are also released if the target of 8,400 dwellings is to be met. The emerging Local Plan indicates that windfalls will amount to 960 dwellings (80dpa) in the period from 2019 to 2031. The Council will therefore need to ensure that a number of sites not specifically allocated for development in the emerging Local Plan will also be released for residential development in the coming years. The current proposal would make a valuable contribution to the windfall target.

Overall, it is considered that Longborough does offer a reasonable range of services and facilities within walking and cycling distance of the application site. Moreover, a number of the facilities such as the shop, primary school, public house and employment estate are considered to be key facilities that make a significant contribution to the vitality of the village. The introduction of a mix of new residential development would help to assist the long term viability and vitality of the settlement. The proposed development is also not of a size that is significantly larger than other residential schemes that have taken place in the village since the war. For instance, 13 dwellings were allowed at The Folly in 1959, 12 dwellings at Rectory Gardens in 1983, 10 dwellings at Orchard Rise in 1984, 7 dwellings at Bean Hill in 1986 and 9 dwellings at Plum Tree Close in 2011. The village has therefore successfully accommodated similar levels of development to that now proposed in the past. It is considered that Longborough is of a size, and has sufficient facilities, to sustain the level of development now proposed.

(c) Affordable Housing

Local Plan Policy 21: Affordable Housing is the current development plan policy covering the provision of affordable housing in the District. The aforementioned policy seeks to secure 50% affordable housing provision on a mixed open open market/affordable scheme such as this. The applicant has not stated that they are seeking to develop the land as a rural exception site. The open market housing is therefore not being proposed as a means of subsidising the affordable housing element of the scheme.

In terms of affordable housing needs, the last Housing Needs Survey (HNS) undertaken in the area dates from 2014. It was undertaken by Gloucestershire Rural Community Council (GRCC) and was titled Longborough and Sezincote Parishes Housing Needs Survey Report October 2014. The report identified that there were '5 households with a local connection who have self-identified themselves in need of affordable housing, and 9 households currently living in Longborough seeking to buy housing on the open market in Longborough'. The HNS provides a snapshot of need and does not take account of people who may have signed up separately to the Gloucestershire Homeseeker website. The need may therefore be higher than that specified in the HNS. The Council's Housing Officer has examined the proposal and has made the following comments;

'Having reviewed the 2014 Parish Needs Survey, there 5 households in need of affordable rented accommodation in Longborough. Although the housing needs survey indicates the number of bedrooms each respondent has requested, we would look at eligibility criteria for rented affordable accommodation in accordance with our housing register i.e. a single person or couple would only be eligible for a 1 bedroom property.

It is noted that only 1 of these households is registered on the Council's housing register. A recent search of the register, Gloucestershire Homeseeker shows that there are at least 9 households registered for housing in Longborough with a local connection to the parish, over half of whom are 1 bed need. There are a further 69 households registered for Longborough with a local connection to the surrounding parishes; however this includes Moreton-in-Marsh. In addition a search of housing association stock in Longborough has shown that there are no 1 bedroom properties in the village.

The survey information would therefore translate into a need for the following rented affordable accommodation:

1 x 1 bed 2 person houses or bungalows of not less than 45m²
 2 x 1 bed 2 person bungalows of not less than 45m²
 1 x 2 bed 4 person house of not less than 75m²
 1 x 3 bed 6 person house of not less than 95m²

There is also no shared ownership housing in the village which we wish to see addressed on this development. 1 bed and 3 bed discount sale homes have not sold well to local people, to date, in North Cotswolds so we would not support them on this development.

Shared ownership

1 x 2 bed 4 person house of not less than 75m²

Shared ownership or Discount Sale Home Ownership

1 x 2 bed 4 person house or bungalow of not less than 75m²

Shared parking arrangements and 'communal' garden areas between private and affordable and family and older persons-suitable accommodation should be avoided as it increases management and maintenance costs on what are supposed to be affordable homes and can also cause management difficulties with different needs for use. Instead the dwellings should be provided with larger private gardens, particularly the family housing. Steps should be avoided, particularly for the bungalows.'

The applicant is proposing the following mix of affordable dwellings;

Affordable Rent

2 x 3 bed dwellings
 2 x 2 bed dwellings
 1 x 1 bed dwelling

Discount Sale Home Ownership

1 x 3 bed dwelling
 1 x 1 bed dwelling

The applicant is agreeable to the provision of 7 affordable units including 5 affordable rental units. The Parish Council is also in favour of the mix proposed by the applicant. However, there is a difference between the applicant/Parish Council and the Housing Officer in respect of the tenure mix and the size of the proposed units. The applicant is proposing 2 discounted sale home ownership (DSHO) dwellings. However, the Housing Officer advises that there has been difficulty in the past in finding purchasers for such units and would therefore prefer to see one shared ownership unit and one DSHO unit. In addition, the Housing Officer states that the provision of 3 three bed dwellings would not meet identified local need which is more focused on one and two

bedroom units. If three bed dwellings were constructed without evidence of local need then they would potentially end up having to be let to people from outside the immediate area. It would also deny those people within the parish who have a need for a one or two bedroom property the opportunity to take on an affordable unit.

At the time of writing this report, discussions were still ongoing between the various parties as to the final mix and size of the affordable units. However, it is evident that there is general agreement that 7 affordable dwellings should be provided as required by Local Plan Policy 21. The proposed development is therefore acceptable in this respect. The final form of the affordable housing would also ultimately be set out in a S106 Legal Agreement. It is considered that the proposed development is acceptable in principle subject to agreement being reached over the final mix, tenure and size of the affordable dwellings.

The provision of the affordable housing is considered to represent a significant social benefit. It will help to address the Council's need to provide homes for local people and as such it is considered to represent a significant benefit when considering the planning balance.

(d) Impact on Character and Appearance of Cotswolds Area of Outstanding Natural Beauty

The site is located within the Cotswolds Area of Outstanding Natural Beauty (AONB) wherein the Council is statutorily required to have regard to the purpose of conserving and enhancing the natural beauty of the landscape.

Paragraph 17 of the NPPF states that planning should recognise 'the intrinsic character and beauty of the countryside'

Paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by 'protecting and enhancing valued landscapes'.

Paragraph 115 states that 'great weight should be given to conserving landscape and scenic beauty in ... Areas of Outstanding Natural Beauty.'

Local Plan Policy 42 advises that 'Development should be environmentally sustainable and designed in a manner that respects the character, appearance and local distinctiveness of Cotswold District with regard to style, setting, harmony, street scene, proportion, simplicity, materials and craftsmanship'

The application site and its surroundings are classified in the Cotswolds Conservation Board's Landscape Character Assessment as falling just within Landscape Character Area 15B Vale of Moreton Farmed Slopes. This in turn falls within Landscape Character Type Farmed Slopes. Characteristics of this particular landscape include;

- Transitional landscape between the High Wold and the Pastoral Lowland Vale;
- smooth gentle landform with gentler landform on lower slopes, and sense of exposure on some upper slopes;
- small, often geometric, broadleaf and coniferous woodlands and tree belts along watercourses draining the slopes;
- large deciduous and mixed woodlands bordering parkland, integrated by strong hedgerow network;
- productive arable and pasture farmland with a strong pattern of hedgerows;
- small stone built villages and hamlets on slopes above the Pastoral Lowland Vale;
- areas of ridge and furrow on lower slopes

The Landscape Strategy and Guidelines for the Cotswolds AONB identifies the 'Expansion of existing settlements up the Farmed Slopes' and 'Ad hoc housing development' amongst its list of 'Local Forces for Change'. 'Potential Landscape Implications' of such development are identified as;

- Erosion of dispersed settlement character across the Farmed Slopes.
- Loss of tranquillity
- Proliferation of suburban building styles and materials and introduction of ornamental garden plants and boundary features.

The 'Outline Landscape Strategies and Guidelines' advises;

- Promote policies of extreme restraint on developments in or adjacent to these settlements
- Ensure new built development within and on the fringes of the settlements is very carefully integrated with the rural landscape setting of the Farmed Slopes and the existing settlement form of villages
- Minimise the proliferation of new inappropriate road infrastructure
- Conserve the distinctive rural and dispersed settlement pattern.
- Restore existing stone farm buildings and structures in preference to new built development. Existing buildings should be carefully conserved and where converted to new uses must retain their historic integrity and functional character. Sound conservation advice and principles must be sought and implemented
- Maintain the sense of openness and consider the impact of built development on views to and from the Farmed Slopes.
- Control the proliferation of suburban building styles and materials.

The site lies adjacent to one of the principal routes leading into and out of the village and forms part of a rising parcel of agricultural land set behind a native species hedgerow. The hedgerow measures approximately 3m above the carriageway of Moreton Road. Existing village development lies to the west, east and north of the field. Whilst the field links into other agricultural land to its south it is also visually connected with existing village development along its other boundaries. It therefore retains a semi-rural character rather than that which appears overtly as part of the open countryside.

The applicant has submitted a Landscape and Visual Impact Assessment (LVIA) with the application. The LVIA has assessed the site from a number of vantage points in and around the village. Distant views from the Public Rights of Way (Longborough Footpaths 12 and 21) and from Moreton Road to the east are largely screened by a mix of topography and/or vegetation. Views from the heart of the village are also screened by existing vegetation. The principal public views of the site are therefore primarily from Moreton Road adjacent to the application site and from Public Right of Way (HLO12) which runs alongside the western boundary of the field.

With regard to views from the road the existing roadside hedgerow provides the site with a relatively good degree of screening. The creation of the proposed entrance will allow limited views through to the development. However, the overall impact of the scheme when viewed from Moreton Road will be mitigated by the existing hedgerow. The indicative layout also shows dwellings being set back approximately 12m from the hedgerow thereby providing a reasonable buffer zone between the new development and the hedgerow. The indicative plans also show a mix of 1 and 1.5 storey dwellings facing towards Moreton Road and the site entrance. Such a scale of development would help to minimise the visual presence of development when viewed from Moreton Road. The LVIA indicates that the magnitude of change from Moreton Road would

be 'Minor adverse - Moderate within the limited entrance section'. Officers concur with this assessment.

The other notable public view of the site will be from Public Right of Way (HLO12) which lies to the west/south west of the proposed development. At present the Right of Way affords extensive views across the field and to existing residential and employment development beyond. The Plum Tree Close development and the employment estate are readily visible from the footpath. The proposed development will bring development closer to the Right of Way and will therefore introduce development into the foreground. Notwithstanding this, the proposed development will be seen in context with existing residential and commercial development rather than a backdrop of open countryside. It will therefore be located in an area whose character is already heavily influenced by post war development. The indicative layout also seeks to soften the edge of the proposed scheme through the introduction of new native species hedgerow and tree planting along its western and southern boundaries. The proposed development could therefore be undertaken in a manner that would provide a soft edge between the development itself and the adjacent countryside. The proposed development will also not detract from any views of the AONB landscape to the south of the application site when viewed from the Right of Way. The LVIA states that the magnitude of change when viewed from the Right of Way would be 'Moderate adverse'. Officers agree with this assessment.

The indicative layout shows a terrace of 1 and 1.5 storey dwellings located towards the north and north east of the site. The creation of a terraced development is consistent with historic development seen in the centre of the village. As a design approach it is reflective of traditional building forms and would move the development away from the more standard estate style of residential development where detached dwellings are often prominent. The developer has sought to locate the larger detached properties away from the main road thereby helping to reduce their presence on the approach into the village. Consideration will need to be given to the final orientation, size and design of dwellings at the Reserved Matters stage should Outline permission be granted in order that the development can respond in the most sympathetic manner to the adjacent countryside. However, it is considered that the site is of a size that could satisfactorily accommodate the level of development proposed.

In addition to the proposed housing the applicant is also seeking to create an informal play space alongside the western boundary of the site. Dwellings proposed on the western boundary of the site are shown as facing onto the play space thereby ensuring a degree of surveillance. The play space is intended as an open grassed kickabout area rather than an equipped play area for young children. A young persons' play area already exists at the eastern end of Charlesway to the north east of the application site. At present the applicant and the Parish Council are in discussions over the future management of the informal play area. If the Parish Council decides not to take on the area then its future management would be taken on by a private management company. Its provision and long term maintenance would be covered by a S106 Legal Agreement should planning permission be granted. It is considered that the proposed space would represent a community benefit and could be undertaken without having an adverse landscape or visual impact.

Overall, it is considered that the landscape and visual impact of the proposed development will be very localised. Views will place the development in context with existing development. In combination with new landscape planting and the retention of the roadside hedgerow it is considered that the scheme will not have an unacceptable adverse impact on the character or appearance of the AONB and that the proposal would accord with Local Plan Policy 42 and guidance in Paragraphs 17, 109 and 115 of the NPPF.

Major development within the Cotswolds AONB

Paragraph 116 of the NPPF states 'planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of;

- i) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- ii) the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- iii) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that can be moderated'.

No definition of major development is provided within the NPPF or in either of its forerunners - namely PPS7: Sustainable Development in Rural Areas and PPG7: The Countryside which also made similar references to major development within designated landscapes such as AONBs. However, in the High Court judgement in 'Aston and another v Secretary of State for Communities and Local Government and others' the judge determined that the phrase 'major development' did not have a uniform meaning and to define it as such would not be appropriate in the context of national planning policy. The Government's Planning Practice Guide also states 'whether a proposed development in these designated areas should be treated as a major development, to which the policy in Paragraph 116 of the Framework applies, will be a matter for the relevant decision taker, taking into account the proposal in question and the local context.'

The proposed development lies adjacent to existing village development and it will be subject to limited public views. The site has a semi-rural character and the visual and landscape impact of the proposed development is considered to be very localised. It is considered that the proposal will not represent a significant encroachment of development into the wider AONB landscape and that the intrinsic character of this part of the AONB landscape will not be adversely affected. The size and scale of the development is considered to be commensurate with the size of the settlement and the facilities and services that it has to offer. It is therefore considered that the proposal does not represent major development when assessed against the guidance in Paragraph 116 of the NPPF.

(e) Access and Traffic Generation

The proposed development will be served by a new vehicular access which will be created in the northern boundary of the application site. The access will open onto Moreton Road which is a Class C highway and which is subject to a 30mph speed limit. Advisory '20 is plenty' speeds signs are located in close proximity to the proposed entrance. The existing boundary hedgerow that extends along the northern edge of the application site ends at a point a few metres to the west of the proposed access with the result that the existing field is open to view where it adjoins Moreton Road. The proposed access will measure approximately 5.5m in width.

Visibility from the proposed access point is 2.4m by 77m to the west and 2.4m by 136m to the east. Automated Traffic Counter (ATC) 85th percentile traffic speeds are recorded as 32.2mph westbound and 35.2mph eastbound. Visibility requirements for such speeds would be 2.4m by 59.8m to the west and 2.4m by 52.3m to the east. The proposed access point can therefore be afforded with adequate visibility in both directions.

In terms of traffic generation AM Peak Hour traffic flows were recorded as 41 vehicles westbound and 42 vehicles eastbound. PM Peak Hour traffic flows were recorded as 38 vehicles westbound and 45 vehicles eastbound. Vehicle trips during the peak hour periods are projected to be 7 vehicle movements. This would equate to an average of one trip every 8.5 minutes. It is considered that the proposed development will not significantly increase the amount of vehicle movements along Moreton Road. Paragraph 32 of the NPPF states that 'development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe'. The proposed development is considered not to conflict with Paragraph 32.

The proximity of existing junctions at the end of Charlesway and at Plum Tree Close to the east of the application site are noted. The junctions are located approximately 50m and 80m respectively from the proposed new entrance. There is considered to be sufficient distance between the various junctions to prevent any conflict between road users. Moreover, a number of junctions in proximity to one another can have the effect of reducing vehicle speeds by means of increasing

general activity in an area. Gloucestershire County Council Highway Officers have assessed the application and raise no objection to the proposal.

In terms of pedestrian access, the applicant is proposing to create a new formal pedestrian pathway along the northern edge of the application site. It will extend for approximately 120m alongside the inside of the field before connecting into the Public Right of Way that extends along the western boundary of the application site. The footpath would then connect onto existing footways lying alongside Moreton Road which extend into the centre of the village. It is considered that future residents could be provided with a safe means of pedestrian access from the site to the core village facilities such as the shop and primary school.

Overall, it is considered that the proposed development could be undertaken without having an adverse impact on highway safety. It is considered that the proposal accords with Local Plan Policy 38 and guidance in Section 4 of the NPPF.

(f) Ecology

The application is accompanied by an Ecological Appraisal and a Bat Activity Survey report. The site primarily consists of arable land together with improved grassland on the northern and eastern boundaries of the site. A species rich native hedgerow defines the northern boundary of the site. The main species within the hedgerow are hawthorn and blackthorn with occasional ash, dog-rose and elm. Livestock fencing lies along the eastern and western boundaries of the site. Timber post and rail fencing forms the boundary between Plum Tree Close and the application site. Drainage ditches also lie along the eastern and northern boundaries of the site.

The submitted reports indicate that the 'habitats on site in general are common, and with the exception of the north boundary hedge, of low ecological value and easy to replace. Any impacts as a result of loss/changes to these habitats in terms of their vegetation is considered to be negligible'. The bat activity surveys recorded three species of bat on or close to the site (common pipistrelle, noctule and lesser horseshoe). There are no roosting opportunities for bats on the site and the surveys indicate that bat activity relates to foraging activity. No important commuting routes were identified in the site. Main activity was identified towards the western end of the site near the woodland and in residential gardens to the north. Whilst the proposal will result in the loss of small areas of foraging habitat no significant negative impacts on the conservation status of the bat species is predicted given that the proposal will primarily result in the loss of an arable field and the introduction of new native species hedgerow and tree planting through and around the edge of the proposed development. The proposed landscape enhancements would introduce higher value habitats onto the site. The species rich hedgerow along the northern boundary of the site would also be retained.

The Council's Biodiversity Officer states that the 'proposed development will have minimal biodiversity impact with mitigation and compensation in the form of replacement hedgerow planting, tree planting and other habitat creation as an enhancement of the site for biodiversity'. They raise no objection to the proposal.

Overall, it is considered that the proposed development could be undertaken without having an adverse impact on protected species or their habitat in accordance with Local Plan Policy 9 and guidance in Paragraphs 109 and 118 of the NPPF.

(g) Impact on Residential Amenity

The application is accompanied by an indicative layout which sets out how the site could accommodate 14 dwellings and its associated infrastructure. The plans submitted show that each dwelling can be provided with a garden and private outdoor amenity space commensurate with the size of the respective unit. The proposed dwellings can also be arranged in a manner that would prevent an unacceptable loss of light, privacy or overbearing impact. The proposed dwellings are also set sufficiently away from existing properties on Moreton Road and Plum Tree Close so as to avoid an adverse impact on the amenity of existing residents. Overall, it is considered that the proposal accords with Local Plan Policy 46.

The proposed development will also provide an area of open play space which will be made available for public use. The provision of the open space is considered to represent a community benefit and to accord with Local Plan Policy 34.

(h) Flooding and Drainage

The application site is located within a Flood Zone 1 as designated by the Environment Agency. It therefore falls within the lowest designation of Flood Zone. As the proposal is for more than 10 dwellings the applicant has submitted a Flood Risk Assessment (FRA) with the application. The FRA has been assessed by Gloucestershire County Council in their statutory role as Lead Local Flood Authority.

With regard to surface water drainage, the applicant has undertaken intrusive site investigations which indicate that infiltration drainage techniques will not be feasible due to existing geology. The applicant therefore proposes to utilise a system whereby surface water will be discharged at a restricted rate to an existing drainage ditch located alongside the eastern boundary of the application site. Attenuation storage and permeable surfacing will be provided on site in order to restrict peak flows to a greenfield rate plus 40% to take account of climate change. The Lead Local Flood Authority is satisfied that the proposed approach is acceptable and raises no objection to the application. The proposal is considered to accord with Paragraphs 100 and 103 of the NPPF with regard to surface water drainage.

With regard to foul waste, the applicant has submitted a Foul Water Drainage and Utilities Assessment in response to concerns from local residents about the capacity/operation of the existing foul water system. At present there are two connections to the public sewer within reasonable proximity of the site. There is a connection to the north west of the site on Moreton Road and a further connection on Charlesway to the north. Existing housing at the adjacent Plum Tree Close development is served by a private foul drainage system which gravitates to a pump station in Plum Tree Close before being pumped to the public foul sewer on Charlesway. Due to topography it will not be possible to use a gravity connection from the site to either of the existing manholes. The applicant is therefore proposing a pumped connection from the site into the Thames Water sewer manhole on Moreton Road. This will result in foul water entering the public sewer at a different point to that arising from the Plum Tree Close development which will in turn help to disperse the flow into the Thames Water network. The final means of connection into the public sewer network will ultimately be a matter for Thames Water and the developer under separate drainage legislation such as the Water Industry Act 1991 and the Water Act 2014. Thames Water has not objected to the application subject to the attachment of a condition requiring a drainage strategy to be agreed. A connection could not be made into Thames Water's network without prior agreement of Thames Water. It is considered that the proposed development could be undertaken without having an adverse impact in terms of the disposal of foul waste.

Other Matters

With regard to archaeology, the applicant has undertaken a Field Evaluation in response to a request from Gloucestershire County Council Archaeology. The results of the Evaluation has been assessed by the County Council. The Archaeologist states; 'The report on the archaeological evaluation confirms that there is low potential for any archaeological remains to be present on this site. I therefore recommend that no further archaeological investigation or recording should be required in connection with this scheme'.

The proposal will result in the loss of a parcel of agricultural land measuring approximately 1.59 hectares in size. Agricultural land classification maps indicate that the land has historically be designated as Grade 3 land. The maps do not distinguish between Grade 3a and Grade 3b. Paragraph 112 of the NPPF states that 'where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of higher quality'. Higher quality land is considered to be Grade 1 -3a. In this instance it is evident that the land falls towards the lower end of the higher quality definition. Moreover, the site is considered to represent a modest element of a larger network of agricultural fields that extend to the south of the village. The 1.59 hectare is also considered not

to represent a significant development of land. On balance it is considered that the proposal does not conflict with Paragraph 112 of the NPPF.

The application site is located approximately 40m from the edge of Longborough Conservation Area (CA). Woodland and post war housing lie between the edge of the site and the CA with the result that there is no strong visual or historic connectivity between the application site and the historic core of the village. The proposed development will primarily be seen in context with modern post war development and is considered not have an adverse impact on the setting, character or appearance of the CA. The proposal is considered to accord with Local Plan Policy 15 and guidance in Section 12 of the NPPF.

The proposed development will be subject to the New Homes Bonus. The New Homes Bonus is a grant paid by central government to local councils for increasing the number of homes in their area. The New Homes Bonus is paid each year for 6 years. It is based on the amount of extra Council Tax revenue raised for new-build homes, conversions and long-term empty homes brought back into use. There is also an extra payment for providing affordable homes.

With regard to financial contributions Gloucestershire County Council has identified that the proposed development will generate a need for an 1.02 pre-school places and 1.96 additional secondary school places. This equates to contributions of £13,428 and £39,411 respectively or a combined total of £52,839. The requested contribution will be set out in the S106 Legal Agreement. The contributions are considered to be directly, fairly and reasonably related in scale and kind to the development proposed and necessary to make the development acceptable in planning terms. They are therefore considered to accord with the requirements of Paragraph 204 of the NPPF and Paragraph 122 of the Community Infrastructure Levy Regulations 2010. The applicant is agreeable to the contribution request.

9. Conclusion:

Overall, it is considered that the proposal will help to address the Council's need to provide a continuing supply of housing land and will provide affordable housing to meet local needs. It is noted that the Council can currently demonstrate a robust 5 year supply of deliverable housing land. However, this requirement is a minimum not a maximum and as such the Council still needs to ensure that a supply of land is maintained in order to meet its ongoing requirements. Whilst the weight that can be given to the need to provide housing when the supply is in surplus is less than when the supply is in deficit the provision of housing still carries weight when considering this application, especially given the requirement of the NPPF to 'boost significantly the supply of housing' (Paragraph 49).

The proposed scheme will result in the development of a greenfield site located within the Cotswolds Area of Outstanding Natural Beauty wherein the Council is statutorily required to have regard to the purpose of conserving and enhancing the natural beauty of the landscape. In this instance the site is located in close proximity to existing post war development and will be seen in context with existing village development. The visual and landscape impact of the development will be very localised and is considered not to have an adverse impact on the intrinsic character and beauty of this part of the AONB. It is considered that the proposed development could be undertaken without having an adverse impact on the character or appearance of the Cotswolds AONB.

In addition to the above, the site is also considered to be located within reasonable proximity of a range of services and facilities thereby reducing the dependence of future residents on the use of the private motor car. The proposed dwellings will also help to support a number of key facilities in the village thereby helping to sustain the vitality and viability of the settlement in the longer term. This is considered to represent a significant benefit. In addition, no objections have been received to the proposal from any statutory or technical consultees in respect of matters such as highway impact and safety, drainage and flooding or ecology. It is also considered that it would not result in the significant development of the best and most versatile agricultural land or have an unacceptable impact on residential amenity. These matters are considered to weigh in favour of the proposal.

It is considered that the proposal accords with the principles of sustainable development as set out in the National Planning Policy Framework and that this constitutes a significant material consideration that justifies a departure from the current Development Plan. It is therefore recommended that the application is granted subject to agreement over the affordable housing mix, the satisfactory conclusion of the archaeological investigation and agreement over financial contributions to education and library services.

10. Proposed conditions:

In pursuance of their powers under the above Act, and having regard to the Town and Country Planning (Development Management Procedure) (England) Order 2015, the development was considered to be contrary to the following: Cotswold District Local Plan Policy 19. However, the following material considerations were of sufficient merit to justify the permitting of the development:

The proposed scheme will address the Council's need to provide a continuing supply of housing land and will be located in a sustainable location in terms of accessibility to services and facilities. The proposed development could also be undertaken without having an adverse impact on highway safety, biodiversity, drainage or residential amenity and is considered not to have an adverse impact on the character or appearance of the Cotswolds Area of Outstanding Natural Beauty. The proposal accords with the principles of sustainable development as set out in the National Planning Policy Framework.

The Council therefore **PERMITS** the above development in accordance with the details given on the application form and submitted plans, which are subject to the following **conditions**:

1. Application for the approval of the reserved matters shall be made to the Local Planning Authority by three years from the date of this decision notice.

Reason: To comply with the requirements of Section 92 of the Town and Country Planning Act 1990 (as amended).

2. The development shall be started by 2 years from the date that the last of the reserved matters is approved.

Reason: To comply with the requirements of Section 92 of the Town and Country Planning Act 1990 (as amended)

3. The development shall not be started before approval of the details relating to Appearance, Layout, Scale and Landscaping have been given in writing by the Local Planning Authority.

Reason: These are "reserved matters" and were listed in the application for later approval. This is only an outline planning permission and these matters require further consideration by the Local Planning Authority. This condition is imposed to comply with the requirements of the Town and Country Planning Act 1990 as amended.

4. This decision relates to the land outlined in red on drawing number A-P-100-01 and the access details shown in drawing 2016-F-004-001-A

Reason: For purposes of clarity and for the avoidance of doubt, in accordance with paragraphs 203 and 206 of the National Planning Policy Framework.

5. Prior to the commencement of development details of surface water attenuation/storage works shall be submitted to and approved in writing by the Local Planning Authority. The volume balance requirements should be reviewed to reflect actual development proposal, agreed discharge rate and the extent of impermeable areas and runoff to be generated. The scheme shall subsequently be completed in accordance with the approved details before the development is first brought into use/occupied.

Reason: To prevent the increased risk of flooding in accordance with Paragraphs 100 and 103 of the NPPF. It is important that these details are agreed prior to the commencement of development as any works on site could have implications for drainage in the locality.

6. No development shall take place until a SUDS maintenance plan for all SUDS/attenuation features and associated pipework, in accordance with The SuDS manual (CIRIA, C753), has been submitted to and approved in writing by the Local Planning Authority. The approved SUDS maintenance plan shall be implemented in full in accordance with the agreed terms and conditions.

Reason: To ensure the continued operation and maintenance of drainage features serving the site and avoid flooding. It is important that these details are agreed prior to the commencement of development as any works on site could have implications for drainage in the locality.

7. Development shall not take place until an exceedance flow routing plan for flows above the 1 in 100+40% event has been submitted to and approved in writing by the Local Planning Authority. The proposed scheme shall identify exceedance flow routes through the development based on proposed topography with flows being directed to highways and areas of public open space. Flow routes through gardens and other areas in private ownership will not be permitted. The scheme shall subsequently be completed in accordance with the approved details before the development is first brought into use/occupied.

Reason: To ensure satisfactory drainage of the site and avoid flooding. It is important that these details are agreed prior to the commencement of development as any works on site could have implications for drainage in the locality.

8. Prior to the erection of any external walls of the development hereby approved a foul drainage strategy detailing any on and/or off site drainage works shall be submitted to, and approved in writing by, the Local Planning Authority in consultation with the sewerage undertaker and the development shall be undertaken fully in accordance with the agreed details. No discharge of foul water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed.

Reason: The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community.

9. The development shall be completed in accordance with the recommendations in Section 4 of the Ecological Appraisal report dated March 2016 and Section 6 of the Bat Activity Surveys report dated October 2016, both prepared by All Ecology. All the recommendations shall be implemented in full according to the specified timescales, unless otherwise agreed in writing by the LPA, and thereafter permanently maintained.

Reason: To ensure that protected and priority species (great crested newts, hedgehogs, bats, house sparrows and other nesting birds) and priority habitats (hedgerows) are protected in accordance with The Conservation of Habitats and Species Regulations 2010, the Wildlife and Countryside Act 1981 as amended, Circular 06/2005, the National Planning Policy Framework (in particular section 11), and policy 9 of the Cotswold District Local Plan 2011 and in order for the Council to comply with Part 3 of the Natural Environment and Rural Communities Act 2006.

10. Prior to the first occupation of any dwelling hereby approved, a "lighting design strategy for biodiversity" (and in particular for foraging/commuting bats, including lesser horseshoes) shall be submitted to and approved in writing by the Local Planning Authority. The strategy shall:

- i. identify those areas/features on site that are particularly sensitive for bats and bat roosts; and
- ii. show how and where external lighting will be installed (including the type of lighting) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent bat species using their territory or having access to any roosts.

All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the Local Planning Authority.

Reason: To protect foraging/commuting bats, including lesser horseshoe bats, in accordance with the Conservation of Habitats and Species Regulations 2010 (as amended), the Wildlife and Countryside Act 1981 (as amended), Circular 06/2005, the National Planning Policy Framework (in particular Section 11), Policy 9 of the Cotswold District Local Plan 2011 and in order for the Council to comply with Part 3 of the Natural Environment and Rural Communities Act 2006.

11. No development shall take place (including demolition, ground works, vegetation clearance) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall include, but not necessarily be limited to, the following:

- i. Risk assessment of potentially damaging construction activities;
- ii. Identification of 'biodiversity protection zones';
- iii. Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements);
- iv. The location and timing of sensitive works to avoid harm to biodiversity features (e.g. daylight working hours only starting one hour after sunrise and ceasing one hour before sunset);
- v. The times during construction when specialists ecologists need to be present on site to oversee works;
- vi. Responsible persons and lines of communication;
- vii. The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person(s);
- viii. Use of protective fences, exclusion barriers and warning signs, including advanced installation and maintenance during the construction period; and
- ix. Ongoing monitoring, including compliance checks by a competent person(s) during construction and immediately post-completion of construction works.

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details.

A report prepared by a professional ecologist / the Ecological Clerk of Works certifying that the required mitigation and/or compensation measures identified in the CEMP have been completed to their satisfaction, and detailing the results of site supervision and any necessary remedial works undertaken or required, shall be submitted to the Local Planning Authority for approval within 3 months of the date of substantial completion of the development or at the end of the next available planting season, whichever is the sooner. Any approved remedial works shall subsequently be carried out under the strict supervision of a professional ecologist following that approval.

Reason: To ensure that the hedgerows, ditch, trees, bats, great crested newts, hedgehogs and nesting birds are safeguarded in accordance with The Conservation of Habitats and Species Regulations 2010 (as amended), the Wildlife and Countryside Act 1981 as amended, The Hedgerow Regulations 1997, Circular 06/2005, the National Planning Policy Framework (in particular section 11), and Policy 9 of the Cotswold District Local Plan 2011, and in order for the Council to comply with Part 3 of the Natural Environment and Rural Communities Act 2006.

12. A Landscape and Ecology Management Plan (LEMP) shall be submitted to, and approved in writing by, the Local Planning Authority before commencement of the development. The content of the LEMP shall include, but not necessarily be limited to, the following information:

- i. Full specification of habitats to be created, including hedgerows, wildflower meadows and ponds, using locally native species of local provenance and locally characteristic species;
- ii. Full specification of at least 5 no. bird and 5 no. bat boxes to be incorporated into new dwellings; and at least 2 no. bird and 2 no. bat boxes to be erected on suitable trees;
- iii. Description and evaluation of features to be managed; including location(s) shown on a site map;

- iv. Landscape and ecological trends and constraints on site that might influence management;
- v. Aims and objectives of management;
- vi. Appropriate management options for achieving aims and objectives;
- vii. Prescriptions for management actions;
- viii. Preparation of a work schedule (including an annual work plan capable of being rolled forward over a 5-10 year period);
- ix. Details of the body or organisation responsible for implementation of the plan;
- x. Ongoing monitoring and remedial measures;
- xi. Timeframe for reviewing the plan; and
- xii. Details of how the aims and objectives of the LEMP will be communicated to the occupiers of the development.

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body (ies) responsible for its delivery. The LEMP shall also set out (where the results from monitoring show that the conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented. The LEMP shall be implemented in full in accordance with the approved details.

Reason: To maintain and enhance biodiversity, and to ensure long-term management in perpetuity, in accordance with the NPPF (in particular Section 11), Policy 9 of the Cotswold District Local Plan 2011 and in order for the council to comply with Part 3 of the Natural Environment and Rural Communities Act 2006. To maintain and enhance biodiversity, and to ensure long-term management in perpetuity, in accordance with the NPPF (in particular Section 11), Policy 9 of the Cotswold District Local Plan 2011 and in order for the council to comply with Part 3 of the Natural Environment and Rural Communities Act 2006.

13. Prior to the commencement of development details shall be submitted to, and agreed in writing by, the Local Planning Authority for the site access from Moreton Road illustrating two-way passing for the area waste collection vehicle and an estate car. The approved site access shall then be constructed fully in accordance with the approved plans to at least binder course level within 10m of the highway carriageway edge prior to the erection of any external walls of the dwellings hereby approved.

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 the National Planning Policy Framework Paragraph 35 and Local Plan Policy 38. It is important that these details are agreed prior to the commencement of development in order to ensure a safe and suitable means of access during the construction phase of the development.

14. Prior to the erection of any external walls of the development hereby approved details of the pathway from the site's vehicular entrance west to the existing Moreton Road footway have been submitted to and approved in writing by the Local Planning Authority and no dwelling occupied until the approved works have been completed 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 and to give priority to pedestrian and cycle movements in accordance with paragraph 35 of the National Planning Policy Framework and Local Plan Policy 38.

15. Notwithstanding figure 4.1 of the Transport Statement and submitted plans 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/vehicle track edge of the public road 59.8m west and 52.3m 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 Paragraph 35 and the Local Plan Policy 38.

16. 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 and the Local Plan Policy 38. It is important that these details are agreed prior to the commencement of development as any on site works could have implications for highway safety.

17. 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 NPPF. It is important that these details are agreed prior to the commencement of development in order that adequate and safe provision can be made within the site for road users.

18. No dwelling on the development hereby approved 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) including shared surface roads 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 the National Planning Policy Framework Paragraph 35 and the Local Plan Policy 38.

19. Prior to the erection of any external walls of the development hereby approved a scheme shall be submitted to, and agreed in writing by the Council, for the provision of fire hydrants (served by mains water supply) and no dwelling shall be occupied until the hydrant serving that property has been provided to the satisfaction of the Local Planning Authority.

Reason: To ensure adequate water infrastructure provision is made on site for the local fire service to tackle any property fire.

Informatives:

The applicant should note that under the terms of the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2010 (as amended) it is an offence to disturb or harm any protected species, or to damage or disturb their habitat or resting place. Please note that this consent does not override the statutory protection afforded to any such species. In the event that your proposals could potentially affect a protected species you should seek the advice of a suitably qualified and experienced ecologist and consider the need for a licence from Natural England prior to commencing works. Further information can be found at the Cotswold District Council website:

<http://www.cotswold.gov.uk/residents/planning-building/wildlife-biodiversity/biodiversity-development-management/> and

<http://www.cotswold.gov.uk/residents/planning-building/wildlife-biodiversity/ecological-consultants/>

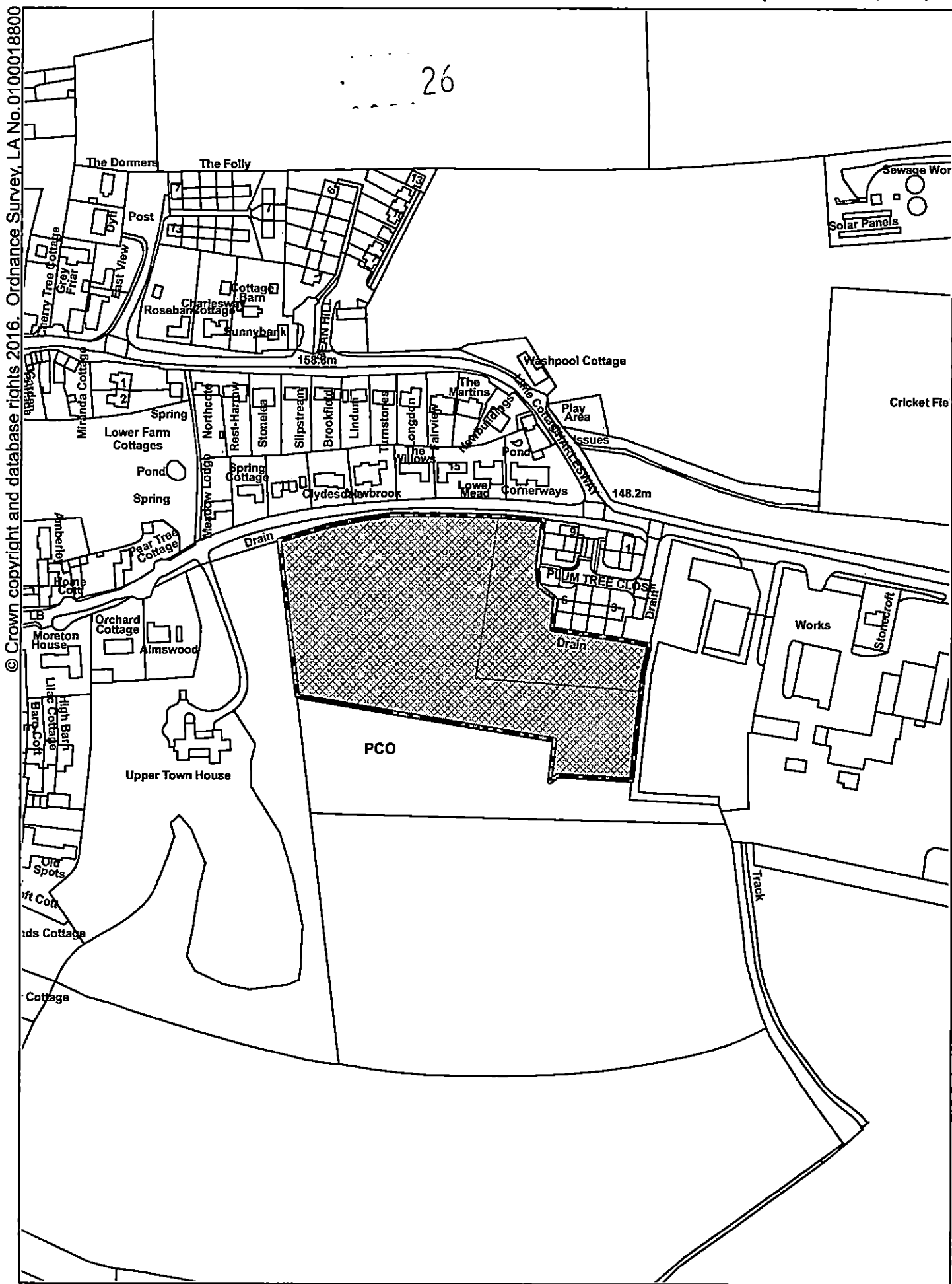
The proposed development will involve works to be carried out on the public highway and the Applicant/Developer is required to enter into a legally binding Highway Works Agreement (including an appropriate bond) with Gloucestershire County Council before commencing those works.

The proposed development will require the provision of a verge crossing and the Applicant/Developer is required to obtain the permission of the Gloucestershire County Council before commencing any works on the highway.

The applicant is advised that to discharge the road/street maintenance condition 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 developer will be expected to meet the full costs of supplying and installing the fire hydrants and associated infrastructure.

Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.



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Land at Plum Orchard Longborough

Scale: 1:2500

Organisation: Cotswold District Council

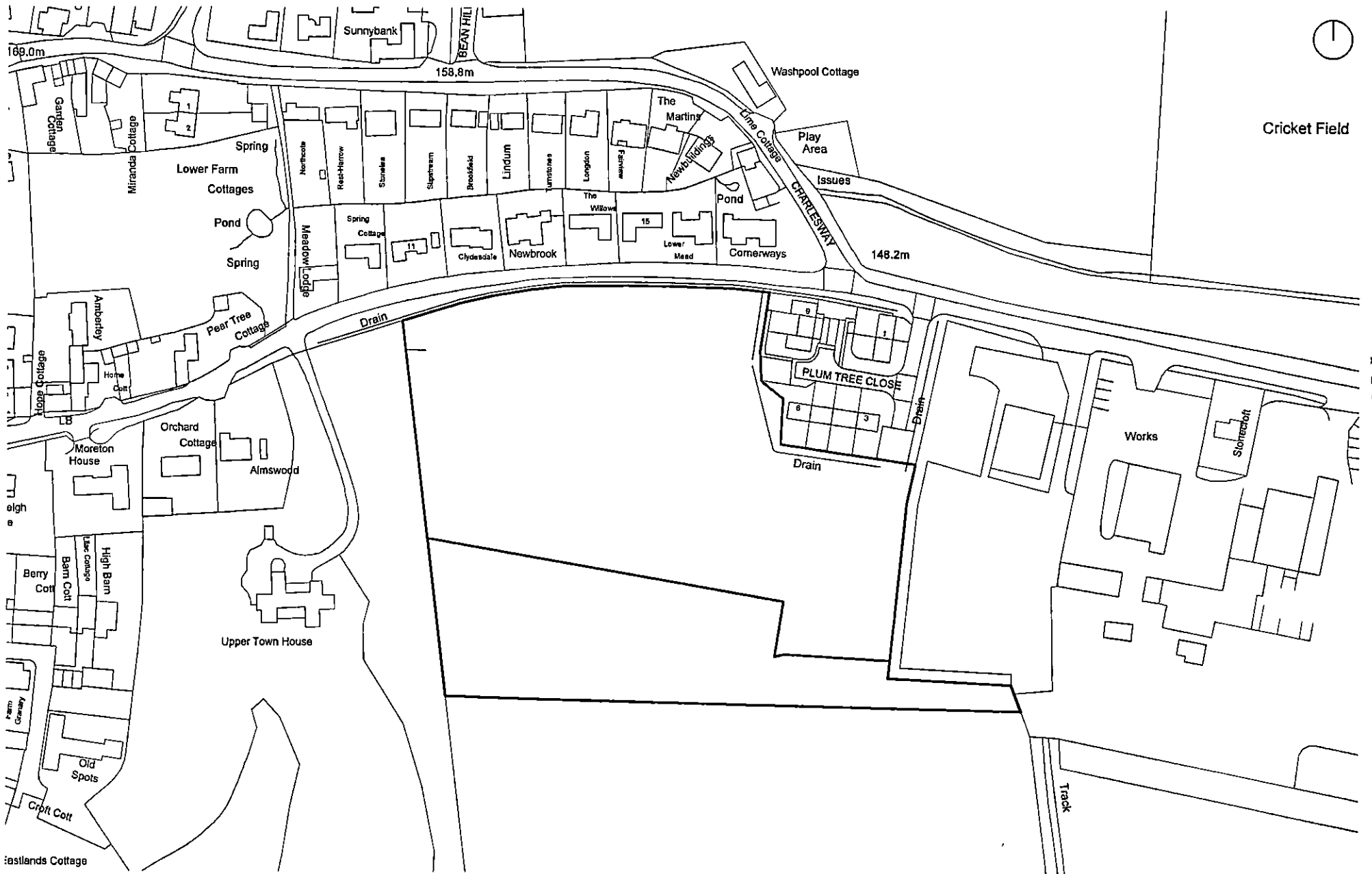
Department:

Date: 26/04/2017



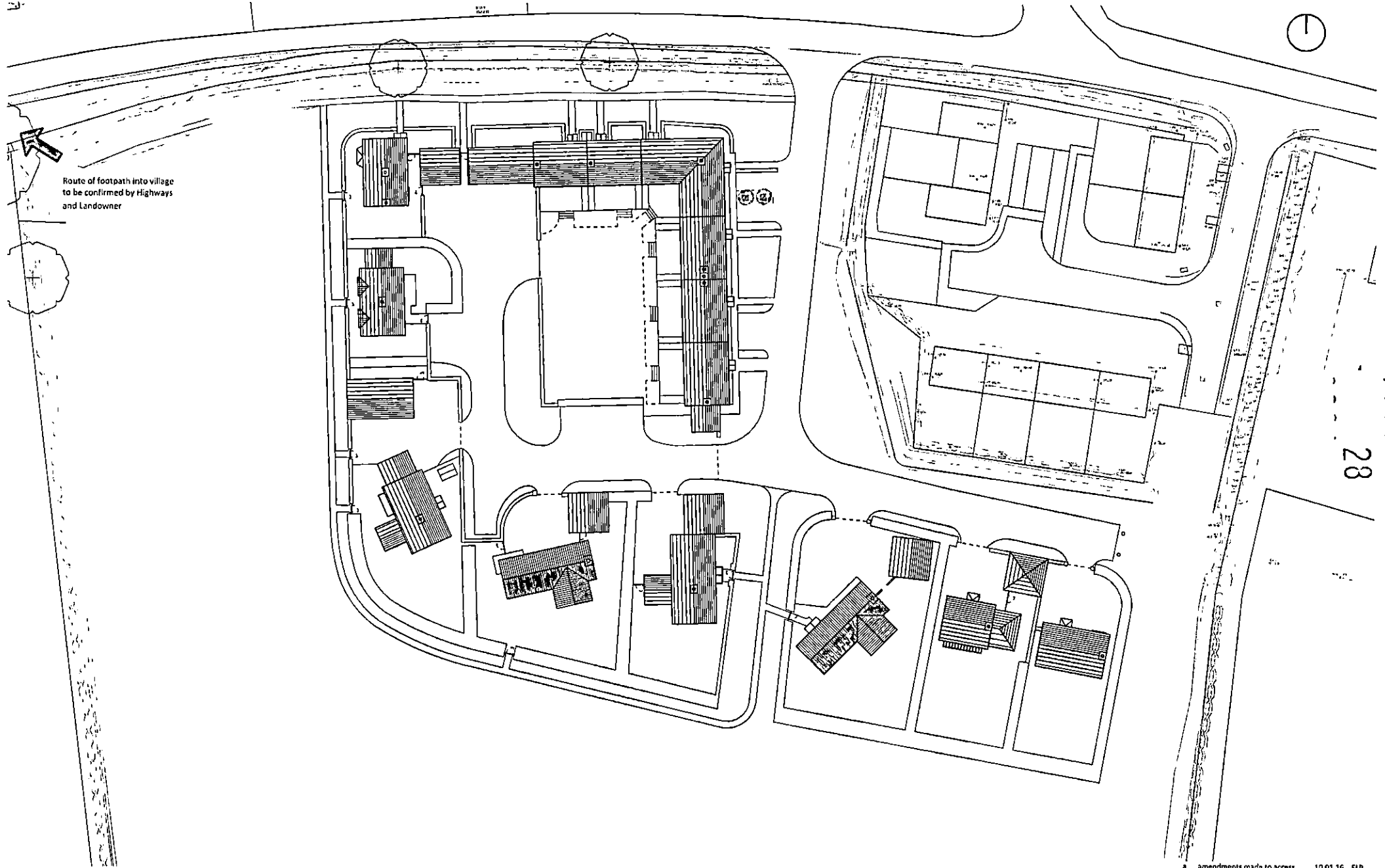
COTSWOLD
DISTRICT COUNCIL





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17100321007



Route of footpath into village
to be confirmed by Highways
and Landowner

amendments made to access 10.01.16 ELD
road radii



Sketch Design On behalf of: Mr. M Stokes	PROJECT Former Plum Orchard, Longborough
Produced by: DAVIESLANDSCAPE <small>ARCHITECTS</small>	DRAWING TITLE Illustrative Masterplan - Rev C
<small> Suite 15, Stroud House, Rossett Street, Stroud, G5 1AN t 01453 766385 e info@dl.co.uk w www.dl.co.uk </small>	DATE: January 2017 SCALE: 1:750 @ A3
LUXTON ARCHITECTS	DRAWING NUMBER: DLA.1706.L001.02



Above: View from Public Right of Way (HL012) to south west of application site

Below: View from Public Right of Way (HL012) to west of application site




NORTH COTSWOLD DISTRICT
Chairman

Ms Alison Clifton Barnard
 Upper Coscombe Barns
 Upper Coscombe
 Temple Guiting
 Cheltenham
 GL54 5SB

Cotswold District Council
 Trinity Road
 Cirencester
 Glos GL7 1PX

24 February 2017

For the attention of Martin Perks

Dear Sirs

Application Reference 17/000321/OUT: Land at Plum Orchard Moreton Road Longborough

I write to set out the North Cotswold District of the Campaign to Protect Rural England's objection to the proposed development. We have examined all the documents which accompany the planning application. Representatives of CPRE visited the site on 16 February 2017.

The Emerging Development Plan

We observed in our recent representations on Dunstall Farm (16/05258/FUL) that the development plan is in a stage of transition. However, we consider that in this case, more weight should be attached to the adopted Local Plan, as unlike Dunstall Farm, the site at Longborough is not proposed for allocation. Indeed, we note that the emerging Local Plan does not make any allocations for housing in settlements the size of Longborough, and there is no specific reference to the village, or any other small village, in the main text of the Plan.

Policy DS3: Residential Development Outside The Principal Settlements

We note that emerging Policy DS3 is positively drafted. Taking each of the five criteria in turn, the proposed development could reasonably be described as adjacent to the village, and therefore meets criterion (a).

The second criterion is in our view difficult to apply. In the Planning Design and Access Statement, the applicants have referred to the economic benefits of the scheme in their consideration of the planning balance. However, they have provided no detailed evidence of the extent to which the proposed development might support local facilities and services. Indeed, such evidence would be hard to produce, as people exercise choice in their

expenditure. Services in Longborough are somewhat limited, and unlike many villages in the North Cotswolds, it lies close to two of the District's towns. Both Moreton in Marsh and Stow on the Wold, each with a much greater range and choice of services, are located within about 4km of Longborough. In the absence of clear evidence, the proposed development must be regarded as neutral in respect of this criterion.

In relation to criterion (c), we do not think it could be reasonably argued in principle that the scale of the proposed development is excessive in relation to the size of the village. 14 dwellings represent about 5% of the housing stock, 272 dwellings, in the civil parish at the time of the 2011 Census.

In respect of criterion (d), we consider that the proposal does not complement the form and character of the settlement. Reasons are set out below in the review of the applicant's Planning Design and Access Statement.

Criterion (e) is not applicable in the sense that there have been no other recent proposals for the issue of cumulative impact to arise.

It is clear from the drafting of the policy that all five criteria must be met if development is to be considered acceptable. On the basis that the proposal does not meet criterion (d), we consider that it does not comply with this policy.

Policy 19: Development Outside Development Boundaries

CPRE has given further thought to the continued applicability of adopted Policy 19. We understand that in many cases throughout England development plan policies other than those which directly deal with housing numbers have been interpreted as relating to housing land supply. Policy 19 is one such policy. However, this policy does not refer to a defined time period, and in our view, remains relevant until the new Local Plan is adopted, as the Council can demonstrate that there is currently a five-year supply of land for housing in the District.

We note from Policy 18 and its first footnote that development boundaries were defined only for Cirencester and the nine principal settlements. Policy 19 therefore applies to any other location in the District.

Like emerging Policy SD3, Policy 19 is positively cast. However, it sets appropriately strict criteria for development to be acceptable. We consider that the proposed development does not meet all of the criteria.

First of all, it does not meet the requirement of the first part of the policy, in that it does not relate well to existing development. Nor does it meet criteria (a) and (c). There is no evidence of any unmet social and economic needs for market housing which would support the development in terms of criterion (a). In respect of criterion (c), it is likely that most if not all new residents will use a car to travel to work, and indeed for most other purposes.

Planning Design and Access Statement

We disagree with the applicant's interpretation of the strategic planning context set out at paragraph 1.8. Any policy which does not make reference to a time period is not necessarily rendered out of date by the expiry of the time period covered by the plan which includes it. This principle forms the basis for the provisions for the saving of policies. The probability that the emerging Local Plan will not be adopted until 2018 will not necessarily prevent some of the allocations in it from coming forward, as the circumstances in which a planning application can reasonably be refused on grounds of prematurity are now very limited.

CPRE is concerned about the layout and design of the proposed development, notwithstanding the outline nature of the application. The paragraph in the PDAS which most concisely summarises those concerns is 4.47. It refers to 1, 1.5 and 2 storey development. The height of the affordable dwellings on Plumtree Close in relation to the single storey dwellings opposite does create a problem for any development on this site. However, the distribution of the 1, 1.5 and 2 storey dwellings shown by the illustration opposite paragraph 4.47 will create an even more incongruous relationship between the proposed and existing development. In addition, we consider the orientation of the dwellings on plots 3, 5 and 6 to be arbitrary.

We note Section 5 of this statement on affordable housing. The Housing Needs Survey on which planning application 10/00338/FUL was based, for 9 affordable dwellings on an adjacent site, was carried out in 2004. We therefore acknowledge that additional needs for affordable housing in the area will have arisen since, and that in principle the seven affordable dwellings now proposed as part of this scheme will help to meet them. At the same time, however, several local objectors have pointed out that affordable housing will form a significant part of the Dunstall Farm development in Moreton in Marsh. Any such housing will be more sustainably located than it would be in Longborough; it should be noted in this context that our recent objection to 16/05258/FUL was on the grounds of its lack of compliance with the emerging Local Plan and not to the principle of development on the land proposed for allocation.

Furthermore, a characteristic of schemes consisting entirely of affordable housing, as in the case of 10/00338/FUL, is that they could proceed in locations where market housing would not normally be permitted. The same does not apply to the present scheme, even though it provides the proportion of affordable housing that the emerging Local Plan seeks. In other words, we consider that the provision of a significant measure of affordable housing in the present scheme does not help to justify it.

We therefore disagree with the statement which then follows at paragraph 6.2. This acknowledges that 10/00338/FUL was a rural exceptions scheme. For this very reason, it

does not follow, as this paragraph states, that the principle of development is established in this area.

We disagree with the applicant's view of the applicability of Policy 19 set out at paragraph 6.14. On the contrary, we believe that Policy 19 continues to serve a very useful purpose until it is replaced, by restraining development in what, by definition, are less sustainable locations in a situation where, for reasons outlined above, development could proceed without significant hindrance on the proposed allocations in the emerging Local Plan.

Landscape and Visual Impact

We note that the applicant has provided no Landscape and Visual Assessment or equivalent. This we find surprising in view of the site's location in an Area of Outstanding Natural Beauty, and indeed it raises the question of whether the application can properly be determined in the absence of such an assessment.

Our own observations are as follows. The proposed development would not extend the village in an easterly direction, as to the east of the site lies the affordable housing scheme at Plumtree Close and beyond that established commercial uses, extending about a further 300 metres along Moreton Road. The proposed development would have no adverse visual impact on the approach from the east, as it is likely to be obscured by the existing housing on Plumtree Close, with its steeply pitched roofs.

However, we consider that the effect on the landscape will be adverse in the wider context. Paragraph 6.2 of the emerging Local Plan neatly summarises the relationship between villages and the countryside: *"Most of the District's settlements have an essentially rural character that often merges into the surrounding landscape – a particular characteristic of the Cotswolds"*. We consider that however important the contribution of the Plumtree Close scheme to the provision of affordable housing in the area, its location and design did harm to the relationship between village and countryside. We consider that far from mitigating such harm, the illustrative material for the present scheme suggests that the existing harm will be exacerbated.

Other Consultation Responses

We note the response dated 21 February from the Lead Local Flood Authority, raising no objection subject to conditions.

We also note from the Council's website that there is a significant measure of public support for the proposed development, as well as a number of objections. Our reasons why the application should be refused are given above; we do not necessarily endorse all the reasons given by other objectors.

The Planning Balance and Conclusion

We consider that the economic benefits of the proposed development in the construction phase are likely to be slight; it is a relatively small scheme and there is no guarantee that local contractors will be employed. If and when the dwellings are occupied, the economic benefits to the village are also likely to be slight in view of the limited services it provides.

In social terms the benefits are also unlikely to be significant; criterion (a) of policy 19 is relevant in this context, and as already indicated there is substantial scope in the medium term for a significant addition to the affordable housing stock in a more sustainable location, namely Moreton in Marsh.

Notwithstanding the outline status of the application, we consider the illustrative design and layout to be unsatisfactory to the extent that development would bring about environmental harm. This we believe outweighs the relatively minor benefits of the scheme.

For the reasons given, we believe that this application should be refused, and respectfully ask the Council to do so.

Yours faithfully

Alison Clifton Barnard