

**Item No 01:-**

**19/00086/OUT**

**Land To East Of Evenlode Road  
Moreton-In-Marsh  
Gloucestershire**

## Item No 01:-

**Erection of up to 67 dwellings, open space, and landscaping (Outline application)  
at Land To East Of Evenlode Road Moreton-In-Marsh Gloucestershire**

<b>Outline Application 19/00086/OUT</b>	
<b>Applicant:</b>	Gloucestershire County Council
<b>Agent:</b>	SF Planning Limited
<b>Case Officer:</b>	Martin Perks
<b>Ward Member(s):</b>	Councillor Rachel Coxcoon
<b>Committee Date:</b>	12th June 2019
<b>RECOMMENDATION:</b>	<b>PERMIT subject to completion of S106 legal agreement covering affordable and self-build housing and Unilateral Undertaking covering financial contributions towards pre-school and primary education and library services</b>

**Main Issues:**

- (a) Residential Development in a Development Boundary
- (b) Housing Mix and Affordable and Self/Custom Build Housing
- (c) Impact on the Character and Appearance of Moreton-in-Marsh Surrounds Special Landscape Area (SLA)
- (d) Access and Highway Safety
- (e) Impact on Residential Amenity
- (f) Flooding and Drainage

**Reasons for Referral:**

This application has been referred to Planning and Licensing Committee by Officers due to the level of local concern about the proposal, in particular in relation to highway matters. Prior to the Council elections on the 2nd May 2019, ex-Cllr Dutton also requested that the application be referred to Committee for the following reasons:

'The site, known as 'the Polo Field', on Evenlode Road was included as a late addition to the CDC 'Emerging Local Plan'. At the Public Inquiry objections were made to its inclusion mainly on the grounds that the Evenlode Road is already severely congested thus compromising access to it. This is because the road here is very narrow and few households along it have off-road parking; at times, there are more cars to be parked than there are spaces available.

Notwithstanding this, the Inspector decided that the site could still be included in the Local Plan.

Whilst the traffic along the Evenlode Road passing the Polo Field is light, vehicles also feed into it from Wellington Road, Evenlode Gardens, Croft Holm and Cotsmore Close. There is a GCC highways depot on the edge of the polo field and there is anecdotal evidence that, at times, gritter lorries and other highway maintenance vehicles have difficulty getting along Evenlode Road because of parked vehicles constricting their passage. The addition of more vehicles from an additional 67 dwellings on this site will only compound the problem. In my view the Evenlode Road is the most congested road in the whole of Moreton and the GCC parking team, who reviewed this quite recently, can confirm this. Accordingly, it is my view that, for this planning application to be acceptable, some mitigation of the access constraints is required to allow for the extra traffic this site will generate and also to facilitate the large vehicles from the GCC highways depot seeking to use this road.

Moreton Town Council is convening a public meeting in the Redesdale Hall on Monday 25th February to consider this application. This input is written before I have had the benefit of hearing the debate at that meeting and, therefore, I may wish, if appropriate, to make further comments.

I have separately written to our County Councillor (given GCC's dual role as vendor of the site and as the Highways Authority) to seek mitigation works on the Evenlode Road to improve the access and to facilitate the extra vehicles arising from the proposed 67 additional households.

Given the concerns of local residents, it is appropriate for this application to be determined by the Planning Committee in order to give it full transparency and to provide local residents with the opportunity to make their concerns known.'

### **1. Site Description:**

This application relates to a parcel of agricultural land located on the southern edge of Moreton-in-Marsh. The application site measures approximately 3.5 hectares in size. It occupies the north western part of a larger field that extends to approximately 6.5 hectares in size.

The northern boundary of the site measures approximately 210m in length and adjoins the rear garden boundaries of a number of residential properties fronting onto Evenlode Gardens. The aforementioned boundary is defined by a mix of hedgerows, fencing and some individual trees. To the north east of the application site is located Cotswold Business Village which is occupied by a number of B1 (business), B2 (general industrial) and B8 (storage and distribution) employment uses.

The western boundary of the site is approximately 210m in length and adjoins Evenlode Road which is designated as a Class C Highway. A native species hedgerow forms a boundary between the site and Evenlode Road.

The southern boundary of the site measures approximately 180m in length. Approximately 100m of the southern boundary adjoins the northern boundary of a highway depot belonging to Gloucestershire County Council. The depot site includes a number of functional buildings, a domed building used for the storage of road salt and a mobile phone mast. The domed building measures approximately 11m in height. The mobile phone mast is 15m high. A security fence and some limited vegetation provide a boundary between the site and the County Council depot. The remaining part of the southern boundary of the site is open and forms part of the larger agricultural field within which the application site is located. It lies approximately 55m from the southern boundary of the larger field. The southern boundary of the field is defined by a mix of native species hedgerows and some trees.

The eastern boundary of the site measures approximately 160m in length and is open. It also opens onto the existing agricultural field. The site's eastern boundary is located approximately 120m from the eastern boundary of the main field, the boundary of which is defined by hedgerows and trees. To the east of the field is located a water/sewage treatment works.

The site is located within Moreton-in-Marsh Development Boundary as designated in the Cotswold District Local Plan 2011-2031.

The site is located within Moreton-in-Marsh Surrounds Special Landscape Area (SLA).

A Public Right of Way (HMM10) extends in a north west to south east direction through the middle of the site.

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

Three oak trees located on the western boundary of the County Council highway depot are protected by Tree Preservation Orders.

## 2. Relevant Planning History:

### Application Site

CD.4204/B Outline application for 135 dwellings, estate roads, footpaths, vehicular access of Evenlode Road and Wellington Road. Refused 1971

CD.4204/C Outline application for 40 dwellings, estate roads and footpaths. Vehicular access off Evenlode Road. Refused 1972

Adjacent County Council Highway Depot to the South

CD.4204 Outline application for a bungalow and agricultural workshop. Granted 1966

CD.4204/Ap Bungalow. Granted 1967

CD.4204/Ap/1 Agricultural workshop. Granted 1967

CD.4204/D Erection of a building to provide a workshop and shop. Alteration to existing vehicular access. Granted 1989

CD.4204/E Change of use of existing workshop and storage premises to vehicle maintenance, office and general storage facility. Granted 1998

06/02605/TELEC Erection of 15m column mast accommodating three number antennae and two ground based cabinets, one meter cabinet and ancillary equipment.

09/0025/CWREG3 Erection of salt and plough storage buildings, refurbishment of existing depot building and associated works to facilitate relocation of highways depot. Granted May 2009 - GCC application

14/03650/TELEC Proposed base station installation Prior approval not required 2014

15/02756/TELEC Replacement of existing 15m monopole with 3 antennas with a 15m monopole with 6 antennas and 2 microwave dishes, the removal and replacement of 2 equipment cabinets and development ancillary thereto. Prior approval not required. July 2015

## 3. Planning Policies:

NPPF National Planning Policy Framework  
 DS2 Dev within Development Boundaries  
 EN1 Built, Natural & Historic Environment  
 EN2 Design of Built & Natural Environment  
 EN4 The Wider Natural & Historic Landscape  
 EN6 Special Landscape Areas  
 EN7 Trees, Hedgerows & Woodlands  
 EN8 Bio & Geo: Features Habitats & Species  
 EN10 HE: Designated Heritage Assets  
 EN14 Managing Flood Risk  
 EN15 Pollution & Contaminated Land  
 H1 Housing Mix & Tenure to meet local needs  
 H2 Affordable Housing  
 INF2 Social & Community Infrastructure  
 INF4 Highway Safety  
 INF5 Parking Provision  
 INF7 Green Infrastructure  
 INF8 Water Management Infrastructure  
 S18 S18 - Moreton-in-Marsh

#### 4. Observations of Consultees:

Gloucestershire County Council Highways: No objection

Gloucestershire County Council Lead Local Flood Authority: No objection

Gloucestershire County Council Archaeology: No objection

Gloucestershire County Council Highways Community Infrastructure: Request financial contributions towards pre-school and primary education infrastructure and library services.

Housing Officer: No objection

Environmental Health: No objection

Thames Water:

Thames Water has identified an inability of the existing foul and water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position for foul water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No properties shall be occupied until confirmation has been provided that either:- all wastewater network upgrades required to accommodate the additional flows from the development have been completed; or- a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan. Reason - The development may lead to sewage flooding and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional flows anticipated from the new development. Any necessary reinforcement works will be necessary in order to avoid sewer flooding and/or potential pollution incidents.'

#### 5. View of Town/Parish Council:

Response dated 27th February 2019:

1.The Applicant addresses the highway and parking issues

National Planning Policy NPPF paragraph 109 states that 'development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe'. In paragraph 3.38 of the Planning Statement the Applicant advises that 'Neither of these things are considered to be the case'.

The Council does not believe this to be so. 37 of the 38 objection letters received by 25th February 2019 give traffic and parking issues as the main reason for their objections.

Application No. 18/00165/FUL, a caravan park on the Evenlode road, was refused. One of the four reasons cited for this was 'Traffic Generation and Highway Safety'.

Evenlode Parish Council stated: -

'Only two roads approach this site, Evenlode Road from Moreton-in-Marsh and the village, and Wells Folly Road from the A44. Both are narrow, single lane, unmarked roads with soft verges and no passing places. On the final approach to Moreton, the Evenlode Road is reduced to a chicane for several hundred yards due to on street parking'.

GCC Highways stated: -

'CPRE notes that one of the main concerns of the majority of the objectors, of Morton-in-Marsh Town Council and Evenlode Parish Council is the amount of traffic that could be generated and the unsuitability of the local road network'

Despite this the Transport Assessment, accompanying this application, concluding: -

'there are no highways or transport related reasons to object to this planning application and it is therefore recommended that the proposal be supported'

the current Transport Assessment is not consistent with the decision made on Application No. 18/00165/FUL, the letters of objection and comments received during the extra ordinary council meeting. The reliability and interpretation of the facts in the Transport Assessment, undertaken on behalf of the Applicant, have been questioned. A reassessment is suggested.

In order to alleviate congestion and parking difficulties, the Council request that Highways investigate the parking capacity on Evenlode Road and consider a potential parking opportunity outside 1 -12 Cornish Houses. Consultation with the residents would be required.

Item 4.3 on page 31, of the Transport Assessment states: -

'The development will offer one vehicle access point off Evenlode Road, around 27m to the south of the north western site boundary, where limited carriageway widening on Evenlode Road is offered as part of the proposed development to facilitate the safe movement of vehicles; both existing and those generated by the proposed development.'

Greater detail of what the Applicant means by 'limited carriageway widening' is required. The Council requests that the Applicant should mitigate the effects on the community of all the additional traffic caused by the proposed development

2. Unless the Applicant engages with the Town Council, as recommended in the National Planning Policy Framework, page 13 paragraph 40.

As per the Pre-Application Advice on page 4 of the Planning Application it can be seen there has been no meaningful consultation with the Town Council. Because the development is part of the Cotswold District Local Plan 2011 - 2031 (CDCLP) the Applicant appears to have decided to ignore the above recommendation of the NPPF. As the development sits within the Applicants county boundaries this was considered unacceptable by the Council. The Council wish to be consulted on the following before any decision is made: -

- a. Types of affordable dwellings
- b. Car parking facilities on the Applicants development
- c. Off street car parking alongside the Evenlode Road
- d. S106 / CIL Payments
- e. Allotment contribution
- f. Odours from the Sewage Plant

3. Unless the Applicant can justify why the application exceeds the housing allocation (63 dwellings net) in Policy S16 of the CDCLP

The highway and parking objections, as stated in item 1 above must be addressed before any consideration can be given to increasing the allocated housing on M\_12A. The Transport Assessment has failed to gain the credibility of the local community.

Further comments received on the 20th March 2019:

'At the Council meeting held last night (19.3.19) the following decisions were made:

**RESOLVED**

To object to the development using the same rationale as before but to add comments from CDC's SHELAA Review (Strategic Housing and Economic Land Availability Assessment Review) regarding the site being in a >75% Groundwater flood risk zone and the character of the road limiting development\* and to also ask whether alternative access options have been fully investigated.

Voting: All in favour

"There are concerns regarding the intensified use and car parking capacity on Evenlode Road, which is a very narrow and quiet road and is likely to limit the scale of development. Any access onto this road would need to respect its rural character".

And also,

**RESOLVED**

To request an independent traffic survey

Voting: All in favour.'

Request for S106 financial contributions received on the 4th April 2019:

The Town Council requests contributions towards High Street highway safety/parking, allotments, works to the Redesdale Hall and Horsepool totalling £27,053.

**6. Other Representations:**

50 objections received and 1 general comments received.

Main grounds of objection are:

- i) The Evenlode road is already too busy and chaotic. We don't need any more houses in Moreton. There is a public footpath which is used by dozens and dozens of dog walkers all day long. Will the footpath still be there going through a housing estate? I think the main issue is access on an already very busy narrow road.
- ii) Will people who buy these houses want the 'smell' from the sewage beds which can be quite strong in the summer and the noise from the Highways depot in the winter all night long plus the lights that are on all night ?
- iii) Whilst I don't mind the idea of construction on part of that field, what I do find absurd is the idea that we can stick 67 dwellings there without some consideration to the access along the Evenlode road. I've lived on Evenlode Road and then Wellington road for the past 18 years; it's too narrow for this purpose. It can, at this current moment already get incredibly chaotic, of particular note is seeing the road on a Monday, the combination of School traffic, Commuting traffic, and the Bin lorries can completely gridlock what is essentially 300 metres of single lane road between the junction of Cottesmore Close and the proposed entrance to the development, This is to say nothing of the horse boxes and large pieces of agricultural machinery that often completely fills the width of the road and construction traffic for this new development will also presumably be using the Evenlode Road? Public Transport, especially in East Moreton is largely an afterthought so it must be assumed, along with the amount of car parking spaces in the plan, that the primary means of transportation for these residents will be the car. In that case serious consideration needs to be given to improved access (be that a different way or a modification of the existing road) for this development so as not to cause considerable disruption to the residents, such as myself and my neighbours who already rely on the Evenlode Road.
- iv) Town is growing too fast.
- v) The access to this site is virtually a single track road which means that construction traffic and then new residents traffic is going to cause serious safety problems. Gloucestershire Highways need access to their site which is just to the south of the proposed housing site which

means there will be more traffic on Evenlode Road than is safe. Why not put a dedicated access road to the site off London Road ? This would be a simple way to solve the problem.

vi) My reason for objecting to this planning application is that the Evenlode Road - the road leading to the proposed development site cannot take any more additional traffic - it is stretched to capacity as it is at the moment. On Monday mornings, in particular, we have the school bus, rubbish collection services, recycling collection services, parents rush hour traffic for the local schools, service vehicles for the Gloucestershire depot using this small section of single track road from Wellington Road to London Road - not to mention heavy farm traffic (which increases in the summer months during harvest time) and horse boxes. In January or February 2018 the residents along Evenlode Road received a letter from the Highways Depot ( further along Evenlode Road ) stating that the gritter lorries were having trouble passing through tight gaps on the Evenlode Road and on one occasion the gritter lorry had to reverse back and go via the Bluebell wood to access the A44. 67 new houses will bring a minimal addition of 67 ( or even possibly 134 ) more cars which will need to access this busy stretch of narrow road; this will compromise road safety and possibly obstruct or delay access for emergency services. Before this application can be considered the parking and access for Evenlode Road needs to be looked at.

vii) I object to this development based on the area being within an area of natural outstanding beauty, with several existing public country footpaths running through it. The existing B road, country lane on Evenlode Road, is insufficient in infrastructure to cope with the vastly increased volumes of traffic/population as a result of developing more housing. The residents of many of the existing houses on Evenlode Road, park on this minor B road for on street parking needs. I also object to the resulting increases in noise, privacy as a result of traffic volumes increasing/population and light pollution will all impact existing residents who live here primarily because of its existing quiet and rural location. This would be massively impacted as a result of this development, significantly reducing the quality of living for existing residents, many of whom are also elderly.

viii) The town is generally being overdeveloped, to all sides of the town, with no regard or plan to accommodate increased traffic, increased population needs for healthcare and schooling.

ix) The traffic on the Evenlode Road from the junction of London Road up to the Evenlode Gardens junction is already very difficult due to the amount of parked cars there, and this constantly causes traffic to queue at both ends and dangerously at the junction off the London Road. The road needs to be widened by creating a parking area for the parked cars to create a clearer thoroughfare through that section of road. Building 67 houses adjacent to Evenlode Road will only make this problem worse. I am also concerned about the flood risk potential, as, being a resident, I am aware of the generally poor drainage around that field and the back gardens of some adjacent houses in Evenlode Garden.

x) Access to the A44 from Evenlode Road is already a nightmare as resident parking make this a single track road. Add in gritters, bin lorries, and school pick up points. A further 67 houses will produce at least 67 more cars, more likely 134 as most households have 2 cars. How will the big lorries bringing building materials reach the site and then on an ongoing basis there will be delivery and parcel lorries. The current road situation will simply not cope.

xi) Development of this site will mean the loss of another green space which is well used by the public.

xii) You will be aware of the Sewage works which does smell from time to time and the Council Yard which can be noisy late at night when the gritters are going out.

xiii) My last point is that it is foolish to build on all the natural drainage areas. Where is the surface water from 67 houses associated roads and paved drives going to go ? remember Moreton in Marsh named for a reason.

xiv) I oppose the development but if the proposed development should proceed, the developers should be held strictly to the considerations taken into account by the Inspector at the Local Plan enquiry which ultimately led to the site being allocated for residential development. In particular: No more than 63 dwellings should be permitted on the site; Effective measures should be required to minimise impact upon the Special Landscape Area; Effective measures should be required to optimise the maintained amenity value of the footpath that runs diagonally across the site for local residents (not just those who will be living on the development). In addition, strict conditions should be imposed upon the building process to ensure that all construction-related traffic is routed to/from the site from the south, rather than using the congested stretch of Evenlode Road between the northwest corner of the site and the London Road.



- xv) Loss of amenity land including a footpath across an open field in a part of the town with little amenity land. If the proposal proceeds it should do more to ensure that the site itself contributes to the amenity of the local population (as well as the residents of the site) - the current plan seems largely to rely upon the footpath following the line of a road and pavement.
- xvi) The loss of a greenfield site in a Special Landscape Area; the current proposals include a series of substantial buildings in close proximity to the Evenlode Road hedge boundary, contrary to CDC advice; this will adversely affect the SLA, while more should be done generally in the plans to minimise the visual impact of the development from both south and west.
- xvii) The loss of Grade 2 agricultural land.
- xviii) The excessive distance from the shopping, educational and health facilities in central Moreton; the traffic/transport report makes over-optimistic assumptions about the likelihood of residents of the new development walking or cycling into the centre of town. It is too far from the centre to expect people to walk/cycle if they have young children, are elderly or unwell, or are likely to have to carry heavy shopping, etc.
- xix) The proximity of the Gloucestershire County Council Highways depot, which involves considerable light and noise pollution from the gritting operations on frosty nights: the noise report annexed to the planning application relies upon a brief survey conducted in September when clearly the Highways depot must have been largely inactive.
- xx) Above all, because of the unsuitable nature of the site due to problems with access via the Evenlode Road. Congestion & traffic flow issues due to on-road parking. - Safety issues flowing from the above (including cyclists, agricultural & gritter lorries) and dangerous congestion at junctions (including onto the London Road).
- xxi) Impact upon the amenity of residents living alongside the road.
- xxii) Adverse effect on the beauty and tranquillity of the area.
- xxiii) The sole access to this development is via Evenlode Road, this is effectively a single carriageway road, particularly between the site and Moreton Town Centre. There is already a lot of traffic, and the congestion, will be appalling during construction, and very much heavier than currently when completed. This is a narrow road completely unsuited to development of this scale. If this development is to go ahead, it is essential that the site has direct access to the A44 London Road. The CDC, if it is minded to grant this application, should thoroughly examine alternative access routes from the A44. It is complete madness to allow development of this size, without making sure that the access is adequate.
- xxiv) The Evenlode Road is a real bottleneck in terms of both parking and traffic, and 67 houses will add to these issues. They will also impact on the traffic in the town of Moreton, which already struggles, especially during the morning and afternoon rush hours and in the busy tourist season. Nothing has been done to improve vehicular access over the railway bridge to the north of the town on the main A429. The primary school is at full capacity and Dormer House has announced its closure. This is also an important recreational facility for walkers and dog walkers alike.
- xxv) This development should not be allowed to go ahead. Moreton has already seen considerable development, but without any related infrastructure improvements. This is another such development. The roads into and around Moreton are gridlocked at times with the subsequent increase in pollution. Evenlode Road is barely able to cope with the current traffic volume. With the addition of 67 dwellings it would become impassable at times.
- xxvi) This is a rare area of open green space within the town that local people can enjoy. This facility should not be removed from the community.
- xxvii) Where are the children, that this development inevitably bring, going to school? The district planning team seem intent on filling as many green spaces with houses to fulfil the almost arbitrary number of new houses in the town plan, but have complete disregard for the impact on numerous aspects of life for residents of Moreton. Infrastructure and provision of amenities and schooling being the most obvious!
- xxviii) There is a lot of congestion at the moment on Evenlode Road. If permission is given, it is essential that another road is created to take traffic from the new houses to the A44 otherwise there will be a semi-permanent traffic jam in Evenlode Road during the daytime. There are cars parked all down one side of the road because there is nowhere else to park. To try and have 67 more households driving up and down Evenlode Road as well is madness. That is double or treble the number of houses already in Evenlode Road and the road cannot handle the existing traffic without aggravation to all concerned because it is single file traffic for 100-200 yards as it is.
- xxix) Evenlode Road is not a main road like the A44 where other developments have been located. 2 small cars can barely pass each other on Evenlode road. In the transport assessment

plan it states that the road accommodates 2 way traffic. This is very misleading as this may be the case for small cars but add larger cars or vans and horse boxes etc cannot pass without one vehicle having to stop. You can tell from all the potholes and damaged verges that it is not a road that comfortably take 2 way traffic. An earlier planning application for a caravan park on the edge of Evenlode was rejected in part due to highways issues so how is this different? Even in the 'design and access' statement it refers to the road as a 'rural' access road. There are issues already with parking on the road especially near to the junction with London road where residents who do not have off road parking park on the road from London Road sometimes through to Wellington Road. Often you would not even get a fire appliance down as the parked cars mean it becomes a single track road. Traffic has to queue to get onto/off Evenlode Road due to this.

xxx) All the traffic/road surveys are just a snapshot of time, the residents that live nearby are the ones that have a more realistic view rather than someone just doing a short survey. You have dog walkers/runners/cyclists/horses that use the road and traffic already breaks the 30mph speed limits so additional traffic would be dangerous.

xxxii) Looking at the development plan the amount of parking spaces that are allocated would not be enough i.e. the one bedroom apartments being allocated one space when chances are it would be a couple residing in them. The new houses would have to actually use their garages for a car to enable 2 cars per drive and in some property's you may have 3 cars. This therefore could add to the parking issues along Evenlode Road especially if residents have to use visitor spaces which are in effect just a layby.

xxxii) Who would maintain the communal areas or areas of open land as this could become unkempt/overgrown or used for overflow parking.

xxxiii) Disruption to residents whilst work is taking place is another concern as it was extremely disruptive when Gigaclear were carrying out broadband work and their vehicles made lots of mess where they parked them on the grass verges. There would be issues with getting all the associated vehicles/deliveries to the site. There would also be the issue of noise whilst the building work was carried out

Security issues with the site which may encourage criminal activity in the area.

xxxiv) Where would the public footpath be located during the works?

xxxv) Destruction of more open space used by residents.

xxxvi) Due to the distance of the development would cause additional parking/traffic issues in the town of Moreton adding more people using cars.

xxxvii) If this development was to go ahead it would set a trend for the rest of the land along the road to be developed and Moreton is already too over developed for the amenities it has i.e. schools/doctors.

xxxviii) There is already no dedicated police office Moreton so increasing the amount of housing would just encourage more criminals to come to the area as they would have more houses to target.

xxxix) This is council owned land so I find it confusing that it will be council planners that will make the decision as to if the application is successful.

xl) The Evenlode Rd is already busy and pulling on/off the London Road to access the site can be difficult due to parked cars from residents living along there, there is not enough room for cars to pass in both directions. This will cause more tail backs on the London Road as people won't be able to turn in. The Evenlode Road is used a lot by cyclists, runners and horses who have to endure the speeding motorists along there. Why does every bit of free land have to be built on, are we not allowed green open spaces!!

xli) A development of this size is unsustainable because of lack of traffic access and parking. The access off the A44 on to Evenlode Road is extremely poor. Because of existing resident parking needs there is only single lane access all the way from the A44 to the proposed site. Currently any large or heavy vehicle, such as school buses, waste removal lorries or horse boxes already create routine blockages preventing residents getting in or out, and bringing traffic to standstill. Add an additional 100-200 plus cars for this proposed development and it is unimaginable how traffic access will work. If this development is to be approved, a different route, not utilising Evenlode Road, needs to be created. Such a new vehicular route would require a new & different turning off the A44 directly into the proposed development.

xlii) The other concern about this development is where will the surface water created by 67 new dwellings run to? This is low lying, clay based land. Placing 67 houses on this field will require some exceptional flood proofing design to capture the additional surface water created, otherwise other areas of Moreton will face flooding.

xl) It would seem the amenity value of the land as part of a Conservation area is being ignored.

xli) We have already been forced to accept a ridiculous amount of new housing in Moreton & the only people who will benefit from this development will be the developers & builders - no one else. We already have enough for anyone who may need a new home. I personally am extremely lucky to be able to walk to work and I can honestly say that without a doubt the recent increase in traffic has been unbelievable - there have been many times I have been unable to cross the road (which I have to do at least 4 times on each journey - though if there were a footpath from the football ground to the business village at least one of these would become unnecessary for me & a lot of other people that need to access the business village or the cemetery) Therefore the extra traffic that would be generated if this nonsense hare brained scheme is allowed to go ahead would be totally unacceptable.

xlii) This road has problems with the amount of parking already with cars etc that never move it is already dangerous getting in and out of drives.

xliii) Highways access and parking - Evenlode road is not a 2 way carriageway, only 2 small cars can pass each other with care on the road. There is also an issue with residents parking on Evenlode road near to the junction with London road whereby the road becomes a single track road. You have cyclists/dog walker/horses using this road and there is no footpath near to where the development is proposed and vehicles already speed along this road so additional traffic would be dangerous. A previous application for a caravan park on the edge of Evenlode was rejected in part due to highways issue so this would cause the same issues. Would also increase traffic/parking within Moreton.

xliiii) There appears to be the minimum allocated parking from residents which does not take into account those with more than 1-2 vehicles per dwelling this may cause further issues for parking on Evenlode Road.

xliiii) Loss of amenity - Destruction of more open space used by residents. Where would the footpath be re-directed to during the works.

xliiii) Over development - Moreton already has been overdeveloped for the amenities it has in place. Would encourage more development applications for Evenlode Road.

i) Moreton does not have a dedicated police presence and the increasing size of the town will only encourage more criminals to see the area as a viable target.

ii) Privacy/light/noise - If the development was to go ahead how would residents be protected from the disruption and noise especially additional large vehicles on the road trying to gain access to the site. What security would be put in place for the site after hours as this could encourage criminal activity.

iii) Trees/landscaping - Who would be responsible for the up keep of the sites landscaping after the development has been completed as could become overgrown and un-kempt. The current hedgerows are nesting sites for birds so this would need to be maintained and not disturbed.

iiii) As this is council land it is concerning that council planning will make the decision on this development.

lv) The proposed development's access via Evenlode Road will put an unacceptable increase in vehicles using this already problematic narrow road. If an alternative route directly onto the A44 could be included I would have no further objection, at this stage, to the proposal.

lvi) Whilst I do not wholly object to the development I have huge concerns regarding the increase in vehicular access via Evenlode Road which is already unable to function optimally. If an alternative route directly onto the A44 could be sought then I would look more favourably on the application.

lvii) The parked cars in front of the Cornish houses cause such an obstacle to other residents of Evenlode road. Adding more cars will make the problem worse. Develop some parking, stop cars parking on the side of the road and would not have a problem with this.

lviii) Current plan is to give access onto Evenlode Rd. This is totally unacceptable as this road is already reduced to one way due to excessive parking towards Moreton. If the scheme must go ahead then access must be to the A44. The planners must take into account that the Evenlode Rd, is a narrow country road used by horse riders and is a recommended bicycle track. It cannot take more traffic and if it does serious accidents will happen.

lix) If there is access on to Evenlode road the traffic problems will be increased as there is already virtually one way system into Moreton due to parked cars. Going towards Evenlode it will become dangerous as there are many livery stables and thoroughbred horses who already have to contend with the pelotons of bicycles and fast cars and lorries and large tractors.

lix) Another housing estate in Moreton with houses that nobody I know can afford to buy. We live in part of the town with no public house and no shop. The only thing that is here is a field where lots of people take their dogs for walks. They will now have to take their dogs for walks in surrounding streets with the dog mess that will come.

lx) Noise from county depot and odour from noise from sewage works.

lxi) The field should be made into a big park for people to enjoy. Moreton has already doubled in size.

lxii) Concern regarding the loss of this tract of land, is that it acts as a natural buffer for surface water generated by the houses nearby and the additional houses that continue to be built in Moreton in Marsh. As the name suggests, this town is on a marshy floodplain, this new proposal for 67 additional houses just adds to the problem.

lxiii) As has been previously stated the Evenlode road cannot stand the increase of traffic that 67 new dealings would bring you could see as more than 134 more cars using the road if each household has two cars but conceivably there could be more at peak times this would cause delays and increase risk of accidents. There is already an issue with parking on the Evenlode road with the junctions being obscured nearly all day long making pulling in and out of cots more close onto Evenlode Road and Evenlode Road onto the a44 a dangerous proposition.

lxiv) Weekends and evenings when residents are at home the access to this site effectively becomes a single way highway which barely copes with current levels of traffic. Any further traffic would cause an intolerable problem. This road, especially during harvest time is very busy with agricultural traffic. The council depot situated on Evenlode road has large amounts of HGV vehicles coming and going. This problem is caused by many houses at the start of the road not having off road parking so they have no alternative but to park on Evenlode which can cause a bottleneck with no passing spaces. It is also a school bus route and an approved Cotswold cycle route. At weekends many hundreds of cyclists use this approved route. Increase I traffic would be a danger to them too.

lxv) The town is already overburdened by numerous housing developments and it should also be noted that the Sunlock development is currently taking place on Evenlode Road which when completed will effectively mean an additional 3 houses to add to the total of 67 currently proposed in the Polo Field application! On this basis and a modest estimate of 2 cars per property it suggests a likely projection of an additional 140 cars requiring the use of Evenlode Road which is essentially a minor road. My major concern is that the apparently extensive Matrix Road Traffic Survey, which has been commissioned by GCC for the proposed development, and the resulting analysis does not come to either reliable or acceptable conclusions for the local residents. In my opinion, the survey is inadequate in that it does not give a full picture of the actual traffic situation on Evenlode Road and at best it is extremely misleading. One conclusion arrived at from the survey was, I quote, 'relatively low flow of traffic' on the road both at the development end and the A44 junction end of the Evenlode Road - even at peak demand times! I refer to the estimation of a rate of one car every 20 seconds - either turning in or out of Evenlode Road at the A44 road junction - as a 'relatively low rate of flow'. That might be the case at Piccadilly Circus but I think it should be regarded as otherwise in Moreton - especially as the flow rate along the main road at that time is several times faster. In addition, the problem of cars turning in and out of the Evenlode Road is compounded but traffic often needing to queue at the junction and there is no provision or availability for traffic lanes there.

lxvi) A considerable length of the Evenlode Road is essentially single file due to an extensive line of parked cars with queuing already necessary at either end. Neither does the survey take into account of the bend in the road outside the Sunlock development which effectively causes a blind bend for road users and makes travel more hazardous. In addition, pedestrians and children in particular are using the route at busy times and cars have occasionally been seen to mount the pavement when oncoming flows of traffic converge. The road already becomes effectively like a chicane ( an obstacle on a race track) and this would only be worsened. The number of traffic incidents would obviously seem to be more likely. I contend that Paragraph 109 of the National Planning Framework Policy should be invoked as there are serious grounds for the Highways Department to refuse the development.

lxvii) The adjacent business park has a significantly wider road and far safer access off the A44. Limited work would be required to allow the proposed site to be entered from here by modifying the access to the sewage treatment works. Alternatively a new access off the A44 could be formed running alongside the east of the business park. The public benefit created by the additional houses (as noted by the local plan inspector) would allow the Council to utilise

compulsory purchase instruments if land ownership and access rights prevented this far safer option being pursued.

lxviii) I do not agree that the principle of development can be established if that principle is predicated on diminished highway safety within the immediate locality of the site. If this application is 'simply intended to demonstrate that the site can reasonably accommodate the level of development proposed' then for the reasons outlined it should be refused as in its current form it cannot accommodate the level of development stated.

lxix) A 1 bedroom apartment is more often than not going to be inhabited by a couple who being in a 1 bedroom would not have children. Therefore, it should be assumed both individuals would be working. As there is limited employment within the Moreton it is also reasonable to suggest two cars would be required. As such the visitor spaces like in Moreton Park would be utilised as parking for permanent residents pushing visitors into dangerous positions elsewhere.

lxx) The development has a variety of larger dwellings ranging from 2 bedroom, 4 person flats to 5 bedroom, 9 people houses. Whilst 2 parking space for a 2 bedroom flat could be considered reasonable personal experience in Moreton Park shows that even 2 bedroom flats are being occupied by 2 couples with 4 cars. There is no way this can be prevented/policed and could undoubtedly cause future problems.

lxxi) A number of the car parking spaces are provided via tandem parking - something local policy tries to limit. It is completely inconvenient, dangerous and creates a significant number of vehicle movements due to car blocking which results in stationary cars idling and blocking the carriageway whilst cars are being switched. This usually occurs at rush hour times when other residents are also going to work and refuse vehicles are trying to collect from properties. Turn circles and lines of site are never taken into consideration and improved. This is made worse still where tandem parking also includes having to manoeuvre one of the vehicles out of a garage - this is the case for every garage, many of the 2 space provided and all of the 'or more' spaces allocated.

lxxii) Visitor parking ratios of 1:5 spaces per dwelling stem from a 1996 study undertaken by Jenks and Noble in Lower Earley in Reading. The changes in demography, explosion of car usage and cuts in the public bus routes seen over the past 25 years should afford this study little weight in determining the suitability of parking provision in modern developments. Notwithstanding this point the blanket utilisation of the 1:5 visitor ratio often used by transport consultants take no account of the different constraints and setting of each site nor the notion that every application should be judged on its individual merits. The transport patterns and superior public transport system of Reading bears little resemblance to the rural conditions found within the Cotswold and so such assertions should be disregarded.

lxxiii) The fact many young people are living with parents into their adult life means it would be highly likely a traditional family unit could have 4 cars if not more. This plot currently has 2 parking spaces in tandem and a garage ie. the '2 or more allocated spaces'. In essence this situation creates a 3 car tandem arrangement. It is completely unrealistic to expect future occupants to have to manoeuvre 3 cars every morning to go to work, travel to school or go to a doctors appointment for example. It is even more unacceptable to expect other road users to wait for this to occur. The practicality aside there is simply no space to do this within the layouts provided. The noise generated from this alone would also not be conducive to maintaining the peaceful amenity local residents are entitled to.

lxxiv) The transport study also significantly plays down the highway safety implications of additional traffic (let alone medium term heavy construction traffic) that will need to navigate Evenlode Road between the proposed site and the A44 London Road.

lxxv) Due to the on street parking this long section of road is predominantly single carriageway. The assertion that there are gaps for passing is simply incorrect as the street is mostly completely full. The situation is worsened by the Evenlode Road/Cotsmore Close junction which forces cars to park on the opposite side of the road preventing drivers having a clear line of site from the start to end of the narrow single file section of road. I for example have had to dangerously reverse back out onto the A44 London road a number of times due to this to let cars through. Many of these instances have been within the last few months. A single traffic study clearly is not sufficient to record the reality of this stretch of road and its junctions.

lxxvi) To the south of the site Evenlode Road and Chapel Lane provide routes out of Moreton in Marsh towards Evenlode, Broadwell and Stow on the Wold. These roads are in a poor state of repair which will be made worse by heavy construction traffic and more frequent car journeys associated with this development. Accordingly a contribution to the repair of these road would be required as part of the application (Policy INF3 INF5 ) I would suggest this is linked to a first

occupation condition. Given the roads are primary cycle routes within the Cotswold's and the application places great weight on sustainable modes of transport as a basis for development this seems a vital requirement.

lxxvii) Further to the point on sustainability and given the recent national government comments on electric car and banning certain combustion engines, the need for provisions for electric car charging is paramount. The newly adopted local plan already appears to be outdated on this matter (Policy INF3 INF5) and more stringent requirements should now be placed on developments. Taking into account the existing policy, it is obviously feasible as an entirely new development to incorporate charging points for low and ultra low emissions vehicles (this should also include visitor parking) as the design stage. This development, if approved will certainly out-live combustion engines so the infrastructure should be provided to take account of this at the outset.

lxxviii) There appears to be a lack of private amenity spaces particularly for the future occupants of the apartments. Equally, as noted below public amenity/green landscaping appears to be limited. As such it is evident that the development is too dense. I note the now adopted local plan allocated this site to house 63 units whereas 67 are being proposed. Evidently if the density of the site was reduced in line with the local plan many of the issues raised above could be addressed and the application would be improved considerably.

lxxix) Like Moreton Park these storm water drainage basins are not public amenities and appear as bog like civil engineer works for most of the year. Even during 2018's driest summer on record these basins were not desirable or utilised public spaces or pleasant green areas that could be observed from afar. The landscape plan drawings are disingenuous in trying to suggest some form of public or landscape amenity would be created. A strategy of buried attenuation tanks should be used to create a usable green landscape. The inclusion of trees in these areas could also provide effective attenuation properties and would soften the site's appearance, improve its biodiversity and help to establish a visual and acoustic buffer - particularly to the GCC depot to the south.

lxxx) Rendered buildings would make a poor focal point and should not be encouraged within the North of the Cotswolds. Its use is not typical of this edge of town development and unlike the south of the region where town centres are seen with rendered facades it is uncharacteristic in the north. Equally a visit to the Moreton Park development which is only a few years old shows the unsightly weathering and staining that has already occurred on the new rendered dwellings. This development will be one of the first things you see as you enter Moreton from Evenlode. Accordingly having bright new render will make the development stand out particularly from distance views - including those in the AONB. Equally, poorly stained building will blight near views and lack the quality expected. Local lime stone which weathers gracefully should be insisted upon. If the developer/the council are trying to avoid homogenised uniformity, splitting the development site between different architects and builders would be a far better way to achieve a more varied and organically produced development. I believe CDC should and could introduce a policy to limit on the number of dwellings that can be designed by any one architect/builder within a development site.

lxxxii) Development sites such as this have been included within CDC's local plan to provided the houses this area needs. These should be primarily for local resident and should help to stop the brain drain the district is seeing where young members of the community are forced to leave the area for more affordable towns outside the district. As such and to avoid what is happening within recent development in Moreton, Stow and Bourton conditions should be imposed that limit the likely hood of these family homes being used as holiday accommodation.

lxxxii) The current mix of houses seem to be too heavily weighted to larger executive homes. There are for example no.28 - 4 beds houses whereas there is only no.3 - 2 bed houses. Clearly this housing mix is predicated on generating a profit rather than providing houses the local area desperately requires.

lxxxiii) The proposed access is onto a rural road, that already experiences difficulties with cars parked on different sides of the road. Particularly problematic are the two junctions at Cotsmore Close/Evenlode Road and Evenlode Road/A44 which are located very close together. The sole access for both Croft Holm and Cotsmore Close is onto the Evenlode Road and the addition of approximately 140 more vehicles could make this area potentially hazardous.

lxxxiv) This site is not as stated in the transport assessment (TA) 'in close proximity to the High Street' but quite a distance from shops and medical facilities in Moreton, and suggesting that it would take only 15 minutes to walk into town is vastly optimistic, especially for homes not immediately located by the access onto the Evenlode Road. Route 1 shown in the TA has Dr P S

Rutter and partners surgery in the High Street. This is the White House surgery which relocated several years ago to the Four Shires Medical Centre by the hospital. The old surgery has now been converted to housing.

lxxxv) Moreton does not have a full range of facilities. Although it does have a full complement of tea and charity shops, there is for instance no shoe shop, no children's clothes shop, no cinema, no secondary school, no NHS dentist.... Driving is really a necessity for a good quality of life in this area.

lxxxvi) Moreton has no need for an additional 67 houses. The town has had significant housing development in the last few years, including affordable homes with minimal infrastructure improvements to roads, parking, sewerage etc. Nearby local towns such as Shipston on Stour and Chipping Norton are also having housing developments imposed upon them. All these new residents to the North Cotswolds will be sharing the same road network leading to more congestion and destroying the very heart of this iconic part of the country.

lxxxvii) At what point is a red line drawn over the continued urbanisation of Moreton. Every scrap of land is being developed, larger houses demolished and transformed into flats, fields concreted over and look alike houses crammed together with little outside space. Cars half parked on pavements because of inadequate off- road parking, pollution levels rising, wildlife disrupted.

lxxxviii) If this outline application must be approved because of the site's inclusion in the CDLP, I would suggest that no building takes place until nearer the end of the local plan (2011-2031) time period, to allow for re- evaluation at that stage of the needs of local people and to ensure that better infrastructure is in place. Also, that the applicant submit a revised transport assessment so that information provided to the planning committee is correct. There are no direct trains to Banbury for instance and Moreton is in the Chipping Campden School catchment area.

lxxxix) Matrix's Transport Assessment (TA), used as supporting evidence by the Developer, is misleading. Examples of this are:-

a. Delays caused by congestion/parking on Evenlode Road.

Section 2.13 identifies hourly peaks as being 08:00-09:00 and 15:00-16:00. Section 2.17, tables 2.3 and 2.4, uses 07:00-09:00 and 16:30-18:30 instead. The table shows average speeds of between 16.5 and 18.5 mph. Section 2.20 uses an unimpeded vehicle travelling at 20mph as a comparator, recording delays of between 4 to 10 seconds. A 30mph comparator, the road's speed restriction, should have been used. This manipulated statistic is then used as supporting evidence in the Transport Impact Summary (section 7.2) concluding "This is not material and will not be impacted by the proposed development".

b. Accessibility.

The TA uses WYG's 'How far do people walk' (July 2015) report's 85th percentile measurement for accessibility of 1,950m. The Department of Transport's 'Manual for Streets' (MfS), the closest to an agreed industry standard, states in section 4.4 'The Walkable Neighbourhood': -

'Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes' (up to about 800 m) walking distance of residential areas which residents may access comfortably on foot.'

The TA dismisses MfS standard in section 2.34 as just being a "suggested guideline" preferring WYG's 1,950m walkable distance being 144% greater than MfS's. As a result, all non-employment locations, the shortest being 1,126m, in table 2.5 are now determined accessible. The TA states, section 2.35, "it can be reasonably be concluded that site is located in an accessible location with facilities that are within appropriate walking/cycling distances". This should be challenged. As the TA uses the MfS on page 26, as evidence of policy compliance, yet decides to discard its commonly accepted walkability standard, the report's credibility comes into question. If the MfS standard had been used by the TA, rather than WYG's, it would probably conclude that additional vehicle journeys would be required due to the lack of walkable accessibility.

xc) Moreton recognises the need to build houses but also subscribes to section 109 of the NPPF which states: - 'Development will be permitted where infrastructure requirements identified to make the proposal acceptable in planning terms can be met'. The Developer has said that costs for mitigation cannot be justified because of the TA's findings. If the TA had been independent, and not misconstrued to support the Developer's objective, it is probable that the evidence would support the need for mitigation. I am asking CDC to request that GCC respects the real evidence and addresses, both as Highways and as the Developer, the need to improve the current and arising issues on Evenlode Road, if the application is to be approved. Without this the development benefits GCC, our County Council, to the detriment of Moreton's Evenlode Road users.

xcix) My understanding is that the manager of the GCC site in Evenlode Road wrote to local residents the winter before last, as the site's gritting vehicles were not always able to use the road between the site and London road, due to parked vehicles. This slowed down gritting activities, so increasing the risk to motorists. Adding additional houses may well increase on-road parking, so increasing the potential frequency that gritters are delayed. From a safety perspective, for all road users driving on roads which are within the area covered by the Evenlode road site, it seems important that the housing development creates no additional on-road parking.

General Comments are:

i) Are you going to take into account the bottleneck at the northern end of Evenlode Road, between Wellington Road and Cottesmore Close, caused by a constant (often unbroken) line of parked vehicles taking up half of the carriageway, essentially turning that 100m or so stretch into a permanent single lane for two-way traffic? There is ample 'spare' land immediately to the west of the road that could easily be turned into off-road parking for more than enough vehicles.

ii) Evenlode Road, from the junction with the A44 (London Road) to Wellington Road, is effectively a one way road due to on street parking. This has an effect both on the flows of traffic along Evenlode road (delays as cars have to make way), but also safety issues for those pulling out onto to the road. I do not feel that this issue is sufficiently recognised in the transport impact assessment, which is somewhat disingenuous when it talks about road widths. This is a particular issue for me, as when I pull out of my car park onto Evenlode Road, I can rarely see oncoming traffic either way due to parked cars. The development will undoubtedly increase flows along the road, exacerbating the problem. While I do not object to the development, I do ask that appropriate mitigation measures are undertaken to address the issue of on-street parking along Evenlode Road, and that the developer is required to support investment in off road walking and cycling routes into the town. With regards to the first issue relating to on-street parking, there is space along Evenlode Road to create off street car parking (an opportunity that was raised at a recent consultation event on the developing Neighbourhood Plan) which could be utilised. Ideally, this should be done before development happens on site as the current issues with the road would not be suitable for the numerous heavy goods vehicles and construction traffic that will arise from the development. With respect to the second point (walking and cycling), there is an opportunity to secure investment to develop better off road routes to the south of the town by improvements to existing public footpaths. This could be linked to investment by the proposed Spitfire Development off the A429 to create an effective sustainable transport route that would reduce the need for vehicular travel movements and therefore reduce the concerns related to movements along the narrow Evenlode Road.

Evenlode Parish Council:

1. The Traffic Assessment is based upon the relevant policy documents and takes account of peak time traffic movements: This road has constant traffic movement and peak time statistics are immaterial to the impact this development will have on the road and the residents.

2. Because there are numerous dropped kerbs on the side of Evenlode Road for the houses closest to the road, residents must park on the other side of the road: There is an almost continuous line of parked cars most of the day opposite the densest housing thereby narrowing the highway. So far as cars are concerned, this always requires give and take on the part of drivers as well as delay in order to enable a flow of vehicular movement. If a school bus or lorry requires other vehicles to give way, then this road becomes excessively congested.

3. Every Monday, there are CDC Bin Collection Vehicles using Evenlode Road for a considerable length of time. This creates a build-up of waiting cars and heavy goods vehicles which cannot avail themselves of any gaps in the parked cars to continue their journey. They must wait for the bin vehicle to completely leave Evenlode Road before any traffic can move again.

4. A development of the nature outlined in the planning application will take very many months to complete and throughout the whole of that time large heavy goods vehicles/skips/builders' materials vehicles etc will require daily and regular access to the site. The level of congestion which this will engender, along with the points made at paragraphs 2 & 3 above, will create an unsustainable & unacceptable level of traffic, congestion and fumes. Additionally, once



completed, the addition of vehicles from the new development will make the ER section increasingly untenable. Single track roads with passing places simply don't work when the travel levels increase slightly.

5. The density of traffic of the nature outlined above will almost inevitably be diesel and the level of particulates in a small built-up area bordering the densest of housing will be injurious to the health of residents and users.

6. An earlier application to CDC for permission for a caravan site on the edge of Evenlode [18/00165/FUL] was rejected - in part - because of Highways issues and the impact of cars towing caravans and motorhomes using Evenlode Road for access to the site. Whilst it is accepted that every planning application is dealt with on its own merits, the rejection of that application partly on access grounds is a factor which CDC ought properly to take into consideration when assessing the instant application which involves similarly large vehicular movements.

Below is an extract from the Delegated Planning Officer's report in that application and Evenlode PC submits that the matters found by the planning officer in that application have equally significant relevance to the Highway issues in 19/00086/OUT. Even though the actual number of potential movements may be less, the vehicles themselves will be as big: "... Highways Only two roads approach this site, Evenlode Road from Moreton-in-Marsh and the village, and Wells Folly Road from the A44. Both are narrow, single lane, unmarked roads with soft verges and no passing places. On the final approach to Moreton, the Evenlode Road is reduced to a chicane for several hundred yards due to on street parking. . . Adding upwards of 30-60 potential movements of incoming and departing caravans on any given day/night will be unsustainable. Many of the drivers will have little experience of towing large and cumbersome caravans and they will be unfamiliar with the challenging nature of ...( Evenlode Road)"

#### Campaign to Protect Rural England North Cotswold District CPRE

'CPRE notes that the site is allocated for housing in the newly developed Local Plan and will make a significant contribution to meeting housing requirements in the northern part of the District.

The two issues which concern the North Cotswold Branch are both addressed by the Local Plan Inspector at paragraph 147 of his report; the public right of way crossing the site, and traffic and parking on Evenlode Road.

In respect of the first, CPRE would wish to see a safe and reasonably direct public right of way retained, so that access to the open countryside beyond can be maintained. We are not, however, persuaded that the reduction in capacity from 68 dwellings to 63 recommended by the Inspector would make any significant difference to the prospects of achieving this. In this context, the 'up to 67' dwellings proposed by the applicant would not be unacceptable.

IR147 says this about traffic and access: However, the Council and local highway authority are satisfied that safe and suitable access can be provided and there is no substantive evidence to demonstrate that this would not be so'. Notwithstanding this, it was clear on the day of the CPRE's recent site visit that Evenlode Road is of variable width, narrow in places and extensively used for parking - few if any of the houses have off-road parking. Difficulties would be exacerbated by the need for access to and parking for the nearby allotments. We therefore share the concerns expressed by the Town Council and individual representors and would urge the Council to consider all reasonable means by which the traffic impacts of the proposed development could be mitigated.'

#### 7. Applicant's Supporting Information:

Archaeological Desk Based Assessment  
 Archaeological Evaluation Report  
 Ecological Appraisal  
 Design and Access Statement  
 Flood Risk Assessment

Noise Impact Assessment  
 Non-Motorised User Audit  
 Planning Statement  
 Statement of Community Involvement  
 Transport Assessment  
 Tree Survey

## **8. Officer's Assessment:**

### **Proposed Development**

The applicant is seeking permission for the erection of up to 67 dwellings and associated development. The application is in Outline form and therefore seeks to establish the principle of development on the site. Matters relating to Access form part of this application. However, other matters relating to Landscaping, Layout, Scale and Appearance have been reserved for later detailed approval. The current layout is purely indicative and intended to demonstrate how the site could accommodate the proposed level of development.

The indicative layout shows a mix of two storey detached and semi-detached dwellings in the form of 1,2,3,4 and 5 bed properties. The southern part of the site, adjacent to the County Council Highway depot, is shown as being set aside for a storm water attenuation basin and landscaped open space.

The site will be served by a new vehicular access onto Evenlode Road. The proposed access will be located in the north western corner of the site. A section of roadside hedgerow measuring approximately 45m in length will be removed to facilitate the creation of the new access point.

The applicant is proposing to provide 40% affordable housing which would equate to 27 dwellings. Up to 3 building plots (5% of development) will be set aside as self/custom build plots subject to such demand being identified on the Council's self-build and custom housebuilding register.

### **(a) Residential Development in 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 this application is therefore the current development plan for the District which is the Cotswold District Local Plan 2011-2031.

The site is located within Moreton-in-Marsh Development Boundary. The following Local Plan policy is considered to be relevant to the proposal:

#### **Local Plan Policy DS2 Development Within Development Boundaries**

'Within the Development Boundaries indicated on the Policies Maps, applications for development will be permissible in principle.'

In addition to the above, the site is allocated specifically for residential development in the Local Plan. The site is designated as an allocated housing development site under Policy S18 M\_12A Land at Evenlode Road (63 dwellings net).

The application site was also assessed by the Local Plan Inspector as part of the Local Plan Examination process. In paragraph 147 of the Report on the Examination of the Cotswold District Local Plan 2011-2031 the Inspector states:

'Land at Evenlode Road (M\_12A) is assumed in the Plan to be able to accommodate 68 dwellings, although the Council now considers 63 to be more appropriate. Given the need to accommodate a public footpath that runs diagonally across the centre of the site in an appropriate layout, and for landscaping to provide a visual screen between the development and the nearby

highways depot and open countryside, this seems reasonable and Policy S18 should be modified accordingly in order to be justified. Evenlode Road is heavily used for on street parking which means that vehicles can only pass in one direction for much of its length, and local residents encounter safety problems using the junction with London Road. Clearly, the provision of over 60 additional homes would increase the amount of traffic using Evenlode Road and the at junction, particularly given that the town centre and other local facilities are some distance away. However, the Council and local highway authority are satisfied that safe and suitable access can be provided and there is no substantive evidence to demonstrate that this would not be so. Overall, I am satisfied that the site is in a suitable location, available and could be developed in a way that would cause only limited harm which would be outweighed by the benefits that would arise from the provision of over 60 new homes.'

It is evident from the above that the Planning Inspector considered that the application site was suitable as a housing allocation site. The release of the land for residential purposes is therefore considered to be acceptable in principle.

### **(b) Housing Mix and Affordable and Self/Custom Build Housing**

The indicative layout plan submitted with the application shows a mix of 1,2,3,4 and 5 bed dwellings. Local Plan Policy H1 states that 'all housing developments will be expected to provide a suitable mix and range of housing in terms of size, type and tenure to reflect local housing need and demand in both the market and affordable housing sectors, subject to viability'. The final mix and range of housing will be agreed at the Reserved Matters stage should this application be permitted. However, the indicative layout plan submitted by the applicant demonstrates that an appropriate mix and range of house types, sizes and tenures can be incorporated onto the site in accordance with the aspirations of Local Plan Policy H1.

With regard to affordable housing, Local Plan Policy H2 states that the affordable housing requirement on all sites requiring a contribution will be up to 40% of new dwellings. In the case of this proposal this would equate to 27 dwellings. The applicant is proposing to meet the 40% requirement. The final mix and tenure of affordable housing will be agreed as part of the S106 legal agreement.

With regard to self/custom build housing, Local Plan Policy H1 seeks to secure 5% of dwelling plots for sale as serviced self or custom build plots subject to such demand being identified on the Council's self-build and custom housebuilding register. The applicant is agreeable to such an arrangement. The provision of self/custom build plots will be covered in a S106 legal agreement.

### **(c) Impact on the Character and Appearance of Moreton-in-Marsh Surrounds Special Landscape Area (SLA)**

The application site is located within Moreton-in-Marsh Surrounds Special Landscape Area (SLA).

The following Local Plan policies are considered relevant to the proposal:

#### **Local Plan Policy EN2 Design of the Built and Natural Environment**

'Development will be permitted which accords with the Cotswold Design Code. Proposals should be of design quality that respects the character and distinctive appearance of the locality.'

#### **Local Plan Policy EN4 The Wider Natural and Historic Landscape states:**

1. 'Development will be permitted where it does not have a significant detrimental impact on the natural and historic landscape (including the tranquillity of the countryside) of Cotswold District or neighbouring areas.
2. Proposals will take account of landscape and historic landscape character, visual quality and local distinctiveness. They will be expected to enhance, restore and better manage the natural and historic landscape, and any significant landscape features and elements, including key views, the setting of settlements, settlement patterns and heritage assets.'

Local Plan Policy EN6 Special Landscape Areas states:

'Development within Special Landscape Areas will be permitted provided it does not have a significant detrimental impact upon the special character and key landscape qualities of the area including its tranquillity'.

In terms of national guidance, paragraph 170 of the National Planning Policy Framework (NPPF) states that planning policies and decision should contribute to and enhance the natural and local environment by 'protecting and enhancing valued landscapes' and 'recognising the intrinsic character and beauty of the countryside'.

On the basis of the SLA designation Officers consider that the site falls within a valued landscape. Paragraph 170 of the NPPF is therefore applicable when considering this application.

The defining characteristics of the SLA are set out in the Special Landscape Areas Review Landscape Context and Physical Changes Final Report May 2017 which was prepared as part of the Local Plan process. The report divides the Moreton-in-Marsh Surrounds SLA into two Landscape Character Types (LCTs) - Undulating Lowland Vale LCT to the north of Moreton-in-Marsh and Pastoral Lowland Vale LCT to the south of the settlement. The application sites falls into the Pastoral Lowland Vale LCT which is described in the Special Landscape Areas Review document as:

'The Pastoral Lowland Vale LCT runs south from the watershed and is contiguous with the Pastoral Vale LCT within the AONB to the west. All the key characteristics apply to the southern part of the SLA either side of Moreton-in- Marsh. In summary, they include:

- Farmed pastoral vale with flat or gently undulating land defined by the rising slopes of the (virtually surrounding) Farmed Slopes (in the AONB).
- Pattern of rivers and streams, dominated by the River Evenlode and its tributaries.
- A generally secluded, intimate scale landscape, interspersed with areas of open character where vegetation cover is minimal and more expansive views are possible from locally elevated areas.
- Productive and verdant landscape predominance of improved and semi-improved pastures together with areas of arable land.
- Areas of wet meadow and species rich grassland bordering river channels.
- Varied field size, although the pastoral land is generally within small to medium scale fields and arable in larger scale enclosures.
- Network of hedgerows of varying height and condition with intermittent hedgerow trees.
- Limited woodland cover, although in places hedgerow and waterside trees combine with woodland copses to create a sense of well wooded character.
- Generally sparse settlement pattern dominated by scattered farmsteads and dwellings.'

A landscape assessment of the application site was undertaken as part of the preparation of the current Local Plan. A report titled Study of land surrounding Key Settlements in Cotswold District Update October 2014 by White Consultants provided the following assessment of the site:

#### DESCRIPTION:

The site comprises part of a single flat improved pasture field on the south eastern side of the settlement. Housing lies to the north, providing a straight and virtually unmitigated edge to the built form. Cotswold Business Park lies to the north east and though not screened has units clad in dark green, which is visually recessive colour and which assists in reducing the development's impact. To the east, there is an outgrown hedge with the sewage works beyond. To the south is a highways depot with a domed salt store set within trees and further pastoral fields beyond a low cut hedge. Evenlode Road lies to the west beyond which are rural houses, smallholdings in small hedged fields and allotments. A public footpath crosses the site diagonally and appears well used, linking the settlement with the countryside. Views are possible from the footpath to the treed skyline to the south/south east across the very gently rolling landscape and intervening hedges and trees. The site's tranquillity is limited by the presence of adjacent development.

**LANDSCAPE SENSITIVITY:**

Evaluation: Medium

Justification:

The site has susceptibility to housing development in respect of being located in open countryside on the quiet southern approaches to the town with the PROW crossing the field and a low hedge for part of the southern boundary. Its eastern, and part of its southern, boundaries are not defined by physical field boundaries. Its value is for local recreation. However, the housing to the north is a somewhat harsh edge and could be improved and the improved pasture is of limited intrinsic value and is generally well screened from the wider landscape. There is potential for development provided that further woodland screening is located to the south east to help integrate any development into the landscape.

The suitability of the site, in landscape terms, for residential development was assessed as part of the recent Local Plan process. The Local Plan Inspector considered that the site could accommodate a level of development similar to that now proposed without having an unacceptable impact on the character or appearance of the SLA. It is noted that the Local Plan allocation refers to '63 dwellings net'. Notwithstanding this, the aforementioned number is a guide to the level of development that the site could be reasonably expected to accommodate. It is not a fixed number. In the case of this particular application, it is considered that the indicative layout demonstrates that a development of 67 dwellings could be accommodated on the site without having an unacceptable adverse impact on the SLA. The indicative layout allows for the retention of a Right of Way through the site and for the introduction of a landscape buffer between new housing and the County Council depot to the south. The current layout therefore addresses the points raised by the Local Plan Inspector in his final report.

In addition, the indicative scheme seeks to retain the majority of the existing boundary hedgerow lying alongside Evenlode Road, thereby providing a green edge to the development. New hedgerow planting would also be introduced along the southern and eastern boundaries of the application site to soften further the edges of the development. The route of the Right of Way through the centre of the site is shown as being retained thereby allowing continued pedestrian access through the site to the fields to the south east. The retention of the Right of Way will also enable views through the development to the countryside to the south east and to St David's Church tower to the north west to be retained. The removal of a section of roadside hedgerow to facilitate the creation of the new vehicular access is considered not to have a significant adverse landscape impact given that the majority of the roadside hedge will be retained and that the new entrance will be located in close proximity to existing development rather than distinct from it. It is considered that the indicative layout demonstrates that the site can accommodate 67 dwellings and still provide sufficient space for additional landscaping and green space.

Overall, it is considered that the site can accommodate the size of development proposed without having an adverse impact on the character and appearance of the SLA and in accordance with Local Plan Policies EN2, EN4 and EN6 and guidance in Section 15 of the NPPF.

**Access and Highway Safety**

The application site lies adjacent to Evenlode road which is a Class C highway. The aforementioned road extends in a north south direction adjacent to the western boundary of the site. It joins the A44 London Road at a point approximately 370m to the north of the application site. Evenlode Road is subject to a 30mph speed limit from its junction with the A44 in the north to a point lying approximately 130m to the south of the north west corner of the application site. A 60mph zone operates to the south of the 30mph zone. The proposed site entrance will open onto a stretch of highway that is subject to a 30mph speed limit. Evenlode Road measures between 4.8m and 5.4m in width adjacent to the western boundary of the site. It measures approximately 4.8m in width to the north of the application site. On street parking is evident along stretches of Evenlode Road to the north of the application site.

The applicant has submitted a Transport Assessment (TA) with the application. The TA has assessed matters such as accessibility, trip generation, access visibility, junction capacity and transport impact. The TA has been assessed by Gloucestershire County Council Highway Officers. A copy of their response is attached to this report.

The application site is located approximately 1.2km from the town centre and railway station, 1.1km from the primary school and 900m from Cotswold Business Village. The route from the site to a range of services and facilities is relatively flat. Pedestrian footways extend from the north western corner of the site to the centre of the town. Guidance in paragraph 4.4.1 of Manual for Streets states that 'Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes' (up to about 800 m) walking distance of residential areas which residents may access comfortably on foot. However, this is not an upper limit and PPS13 states that walking offers the greatest potential to replace short car trips, particularly those under 2 km'. In light of the flat topography of the area, dedicated footways and street lighting it is considered that a range of services and facilities are within reasonable walking and cycling distance of the proposed development. Future occupants of the development will not therefore be totally reliant on the use of the private motor car to undertake day to day activities. Moreover, the accessibility of the site to services and facilities within the town was assessed as part of the Local Plan process. The Local Plan Inspector considered that the site was a suitable location for new residential development. The site is allocated for such purposes in the Local Plan. The allocation of the site for residential purposes in the aforementioned document weighs significantly in favour of the proposed development.

#### Trip Generation

The TA has assessed the impact of traffic arising from the proposed development on the local highway network. As part of the assessment, a 7 day Automated Traffic Count (ATC) was undertaken in June 2018. The ATC was undertaken at a point on Evenlode Road located just to the north of the application site. It recorded average vehicle speeds of approximately 26mph in the vicinity of the application site. Notwithstanding this, the 85th percentile speeds are higher at 32.3mph northbound and 33.6mph southbound. The TA states that 'one reason for the significant difference between the average and 85th percentile speeds could be the number of slower moving farm vehicles that have been observed to utilise Evenlode Road. Given the low vehicle flows on the road (discussed in the following paragraphs), the removal of the slowest speeds as required in the 85th percentile speed calculation would have a significant impact on the speed results.'

With regard to existing traffic flows passing the site entrance, the ATC recorded 39 two vehicle movements in the AM peak (08:00 - 09:00) and 35 two way vehicle movements in the PM peak (17:00-18:00). It is of note that the 49 two way vehicle movements were recorded during the period between 15:00 and 16:00. A total of 408 two way vehicle movements were recorded during a 12 hour period (07:00-19:00).

The proposed development is predicted to generate 31 two way vehicle movements in the AM peak period and 28 two way vehicle movements in the PM peak period. Additional vehicle movements along Evenlode Road during the AM and PM peak periods are predicted to equate to 1 additional vehicle movement approximately every 2 minutes. The trip rate data used by the applicant is consistent with traffic movements arising from two existing similar residential developments in the town (Wellington Road and Fossey Avenue). ATC surveys were undertaken at the entrances to both of the aforementioned developments which contain approximately 60 dwellings and 248 dwellings respectively and which are served by single access points. GCC Highway Officers are satisfied that the proposed trip rate data used by the applicant is acceptable. The proposed development is considered not to result in an unacceptable intensification in the number of vehicles using Evenlode Road.

In addition to the above, the capacity of the Evenlode Road/London Road A44 junction to the north of the application site has been assessed as part of the application process. A Manual Classified Traffic Survey was undertaken in October 2018. The survey recorded 198 and 196 two way vehicle movements passing through the junction during the peak AM and PM periods respectively. The movements equate to approximately 3 two vehicle movements per minute

during peak periods. The proposed development is predicted to result in a net increase of 31 and 27 two way movements through the Evenlode Road/London Road A44 junction during AM and PM peak periods respectively. This would equate to an increase of one additional vehicle movement every two minutes. Capacity testing of the junction has also been undertaken to assess its operational performance in 2023 and 2031. In both instances the junction is predicted to continue to operate within capacity during peak AM and PM periods.

The TA has also considered the impact of the proposed development on the two mini-roundabouts in the centre of the town (A44 London Road/A429 High Street & A429 High Street/A44 Bourton Road). The proposal is predicted to increase vehicle movements at the aforementioned roundabouts by 2%, which is considered not to be significant in isolation. Notwithstanding this, GCC Highway Officers have also assessed potential increases in vehicle movements at the two roundabouts based on committed and preferred development scenarios (ie sites with permission and Local Plan allocated sites). GCC Highway Officers advise:

'Moreton-in-Marsh has been identified to accommodate an Employment site area of 9.16ha and an additional 208 dwellings, on which the proposed development falls under association. A429 (Roman Road)/ A44 (Oxford Street) and A429 (Roman Road)/A44 (Bourton Road) junctions are currently operating within capacity in accordance with Existing 2014 Traffic identified in the Cotswold Local Plan Highway Capacity Assessment (CLPHCA). The level of delay and queuing in both peaks periods is projected to increase as a result of the Local Plan development traffic. This results in the junctions operating near to capacity with Forecast 2031 and over capacity with Forecast 2031 and Preferred Development Traffic and with Forecast 2031, Preferred Development and Reserved Development Traffic scenarios.'

GCC Highway Officers have requested a financial contribution of £29,596 from this particular application to fund highway improvements at the two mini-roundabouts in the centre of the town in order to address future capacity issues arising from the Local Plan allocations. The suggested contribution is based on the size of the development proportionate to the other Local Plan allocations. The allocations set out in Local Plan Policy S18 are M\_12A Land at Evenlode Road 63 dwellings, M\_19A, M\_19B Land South East of Fosseway Avenue 119 dwellings, M\_60 Former Hospital Site 21 dwellings and MOR\_E6 Fire Service College 7 hectares for B1 use. The request for a S106 contribution from GCC Highway Officers is noted. However, the request was made prior to the formal introduction of a Community Infrastructure Levy (CIL) on the 1st June 2019. Highway improvement works are identified in the CIL Reg 123 list as infrastructure that would be funded by CIL. The chargeable rate for residential development is £80 per square for each qualifying dwelling. Money received from CIL would therefore be directed towards meeting the infrastructure improvements requested by GCC Highways. The highway infrastructure works can therefore be funded through CIL rather than S106 contributions.

The application site is one of the site allocations in the Local Plan. The potential increase in traffic arising from the development of this site was therefore considered as part of the Local Plan adoption process. The level of housing proposed on the application site is consistent with the guideline number of 63 dwellings set out in the Local Plan allocation. The proposed development will not therefore result in an increase in housing numbers materially above that considered acceptable in the Local Plan. The Local Plan establishes that the infrastructure of the town can reasonably accommodate the level of development allocated in Policy S18 subject to infrastructure works which will be funded from CIL developer contributions. It is considered that the development of this allocated site for 67 dwellings will not have an unacceptable adverse impact on the local highway network in terms of traffic generation or junction capacity.

#### **(d) Access and Visibility**

Vehicular access to the application site is currently available via a field entrance located in the south western corner of the site. The existing entrance opens onto a stretch of road which is subject to a 60mph speed limit. The applicant is proposing to close this entrance and to create a new vehicular access in the northern part of the western boundary of the site (within a 30mph zone). A pedestrian entrance serving a Public Right of Way can presently be found in the north western corner of the site. The proposed vehicular entrance will be located approximately 25m to the south of the existing footpath entrance. A stretch of roadside hedgerow measuring

approximately 45m in length will be removed to facilitate the creation of the new vehicular access and the requisite visibility splays of 2.4m by 54m to the north and 2.4m by 50m to the south (based on 85th percentile recorded speeds of 32.3mph northbound and 33.6mph southbound). The proposed access has also been tracked to demonstrate that it can safely accommodate the Council's standard refuse vehicle and passing vehicles. The proposed entrance arrangements are considered to accord with Local Plan Policy INF4.

### Parking

The indicative layout submitted with the application shows that a total of 161 allocated parking spaces and 15 visitor designated spaces could be incorporated into the development proposal. This would equate to more than 2 spaces per dwelling. Whilst final parking arrangements will be agreed as part of a subsequent Reserved Matters application, it is considered that it has been demonstrated that the site can accommodate an appropriate level of car parking in accordance with the requirements of Local Plan Policy INF5. The proposed development can be undertaken without causing displacement parking along Evenlode Road.

### Local Concerns

The concerns of local residents regarding traffic congestion and the capacity of Evenlode Road to accommodate the proposed development are noted. In response, it is evident that existing on-street parking along sections of Evenlode Road to the north of the application site reduces the width of the road to a single carriageway in places. At present, motorists often have to stop to allow oncoming vehicles to pass. Notwithstanding this, due to the position of dropped kerbs along the road and gaps between parked vehicles there are spaces available along the length of the road which enables motorists to pull over. As part of the TA, a 'drive-time' survey of the time taken for vehicles to drive along a 499m section of Evenlode Road was undertaken. The survey indicates that existing on street parking results in delay of between 4 and 10 seconds in comparison to unimpeded vehicles travelling along the road at 20mph. The existing on-street parking is considered not to cause significant delays for road users. In addition, accident data from the last 5 years indicates that there has been no recorded personal injury accidents within the vicinity of the application site. There is no evidence to indicate that there is an existing highway safety issue along Evenlode Road.

The ATC data submitted by the applicant, combined with the predicted trip generation data accepted by GCC Highway Officers, indicates that the proposed development will generate 31 and 28 two way vehicles movements along Evenlode Road during the AM and PM peak periods. The additional movements are considered not to result in a significant increase in vehicle movements along the aforementioned road or to have an unacceptable adverse impact on congestion or highway safety. Gloucestershire County Council Highway Officers raise no objection to the application.

A number of objectors have made reference to the creation of access through the employment site/water treatment works to the north/east. The aforementioned land is not in the control of the applicant and there are existing buildings and structures which prevent the creation of a link to the A44 other than that now proposed via Evenlode Road.

Overall, it is considered that the proposed development can be undertaken without having an adverse impact on highway safety or the operation of the local highway network. The proposal is considered to accord with Local Plan Policies INF3, INF4 and INF5 and guidance in Section 9 of the NPPF. In particular, the proposal is considered not to conflict with paragraph 109 which states that 'development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe'.

### **(e) Impact on Residential Amenity**

The application site is bordered to the south by a Gloucestershire County Council Highway depot. An employment estate (Cotswold Business Village) is located to the north east of the application site and a Thames Water treatment works to its east.



The applicant has submitted a Noise Impact Assessment (NIA) with the application. An Odour Constraints Assessment (OCA) was also commissioned by this Council as part of the preparation of the Local Plan.

With regard to noise, the NIA states:

'The main sources of noise are Evenlode Road to the West, the industrial units to the North East and the Highways depot to the South West. Due to the different noise types and relevant assessments separate noise maps have been generated to determine the affected area and the required outline noise mitigation measures for each noise source based on an open site.

Noise criteria have been proposed for dwellings that fall within any of the areas identified (with development) to be impacted by environmental noise.

With suitable acoustic design of the site and building fabric the noise environment will be suitable for residential accommodation and not have an adverse impact on future residents or existing operations.'

In addition to the above, the indicative layout shows the creation of landscape/storm water attenuation basin adjacent to the County Council depot. The application site therefore has sufficient space to provide a buffer between new housing and the depot. The Council's Environmental Regulatory Services Team considers the findings of the assessment to be acceptable and raises no objection to the application subject to a condition requiring internal and external ambient noise levels to be meet British Standard 8233:2014.

With regard to odour, the OCA assessed odour dispersal from the treatment works. The OCA states that the predicted effect is 'not significant' for the allocation site, in accordance with the Institute of Air Quality Management (IAQM) guidance. The treatment works is also located to the east of the application site. Prevailing wind will direct odour away from the proposed development. Environmental Health Officers are satisfied with the findings of the OCA and raise no objection on odour grounds.

The application is considered to accord with Local Plan Policy EN15 and guidance in Section 15 of the NPPF.

With regard to residential amenity, it is considered that the indicative layout demonstrates that the proposed level of housing can be accommodated on the site without resulting in an unacceptable level of privacy, light or outdoor amenity space for future residents of the proposed development or residents of existing dwellings.

#### **(f) Flooding and Drainage**

The application site is located in a Flood Zone 1 which is the lowest designation of Flood Zone. The erection of residential development on such land is considered to be acceptable in principle. The application site is located approximately 200m to the east of the River Evenlode which is classed as a Main River by the Environment Agency.

The applicant has submitted a Flood Risk Assessment (FRA) with the application. The FRA states 'Preliminary site infiltration tests have been carried out and these indicate that a combination of shallow infiltration and attenuation storage will be a viable means of stormwater management for the site'. A stormwater attenuation basin is proposed in the southern part of the application site adjacent to the County Council depot. Swales are proposed to route the surface water from new properties and the highway to the aforementioned attenuation area. The outlet control from the attenuation basin will incorporate a headwall with grate leading to a flow control chamber and hydrobrake. Outflows from the basin will discharge to an existing watercourse southwest of the site on the western side of Evenlode Road. Outflows will be no greater than existing greenfield rates plus an allowance for climate change. The applicant states that the proposed development will accord with Sustainable Drainage principles.

With regard to disposal of foul water, the FRA states that 'Foul drainage will be collected in a new gravity network then discharged to the public sewer system via a pumping station.'

This application has been assessed by Gloucestershire County Council in their role as Lead Local Flood Authority (LLFA). The LLFA considers that the proposed drainage measures are acceptable in principle and raises no objection to the application. The proposal is considered to accord with Local Plan Policy EN14 and guidance in Section 14 of the NPPF.

## **9. Other Matters**

With regard to archaeology, the applicant commissioned a field evaluation prior to the submission of this application. Gloucestershire County Council Archaeology has assessed the evaluation and states:

'The archaeological evaluation comprised the excavation of 24 trial-trenches placed to investigate ground anomalies predicted by the geophysical survey, and also placed to test areas where no such anomalies could be found. The result of the investigation was positive in that investigation revealed an extensive arrangement of enclosures delineated by boundary ditches located in the northern part of the site. Associated features included a number of pits and three hearths or ovens. Finds of pottery and a shale bracelet indicates that the enclosures date to the Middle - Late Iron Age, and the enclosures are thought to represent several phases of later prehistoric settlement.

It is clear from the results of the evaluation that the archaeological remains are not of the first order of preservation, since they have undergone erosion from ploughing and later small-scale mineral extraction, with the result that all surfaces associated with the remains have been destroyed. For that reason it is my view that the archaeological remains are not of the highest significance, so meriting preservation in situ.'

Gloucestershire County Council Archaeology raises no objection to the application subject to a condition requiring the completion of a programme of archaeological work in accordance with a written scheme of investigation.

With regard to listed buildings, the spire of the Grade II listed St David's Church is visible from the application site. The church is located approximately 640m to the west of the application site. It can be seen from the existing Right of Way extending across the site. The allotments to the west of Evenlode Road lie in the foreground of the church. The retention of the route of the Right of Way, as shown on the indicative layout plan, will allow for views of the church to be retained from within the proposed development. In light of the distance between the site and the heritage asset, and the existing foreground of allotments and post war housing, it is considered that the proposal will not have an adverse impact on the setting of the listed church having regard to S66(1) of Planning (Listed Building and Conservation Areas) Act 1990, Local Plan Policy 10 and Section 16 of the NPPF.

With regard to protected species, the applicant has submitted an Ecological Appraisal (EA) with the application. The EA states that 'The site is a single large arable field. Aerial photographs indicate that it has until recently been intensively managed but at the time of the survey the field had been left uncultivated and had been mostly colonised by a mix of annual and perennial plant species along with former crops, leaving a few areas of bare ground.' The northern, western and part of the southern boundary of the site are defined by species poor hedgerows. The eastern boundary of the site and part of its southern boundary are open. Whilst the hedgerows qualify as a priority habitat they are considered unlikely to qualify as important under the Hedgerow Regulations 1997 in terms of their ecological value. With regard to bats, the EA states that the 'The site generally provides poor foraging and commuting habitats for bats. The majority of the hedges are low and do not create the sheltered conditions for invertebrate to gather and provide prey for bats'. Ground nesting birds were found to be absent from the site and the site has negligible potential for reptiles or amphibians. The EA states 'Overall the vegetative habitats on site are common habitats, which are of low to moderate ecological value in terms of their vegetation.' A condition can be attached to a permission requiring tree and hedgerow protection measures to be put in place prior to the commencement of development. This will ensure that the

roadside hedgerow, in particular, is protected during the course of development. The site is also of sufficient size to enable a sufficient buffer zone to be created between the existing boundary hedgerows and new development. Additional native species hedgerow planting can also be introduced along the southern and eastern boundaries of the site to provide ecological enhancements. The creation of storm water attenuation ponds will also increase the biodiversity of the site. 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 EN8.

With regard to the loss of agricultural land, the area alongside Evenlode Road is identified on the historic 1:250,000 scale Agricultural Land Classification Map South West Region as falling into the Grade 2 category. However, it is of note that a disclaimer is attached to the maps which states 'These maps are not sufficiently accurate for use in assessment of individual fields or sites and any enlargement could be misleading'. The aforementioned map can therefore only be used to provide a general guide as to the quality of agricultural land in the local area rather than as a site specific guide to land quality. Notwithstanding this, it is evident that the application area has been identified as being of a high agricultural land quality. The site is therefore considered to be located in an area which falls into the best and most versatile agricultural land category. In respect of such land, Paragraph 170 (b) of the NPPF states that planning decisions should contribute to and enhance the natural and local environment by 'recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services - including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland'. In the case of this particular parcel of land, it is noted that the site is relatively modest in size and that its productive capacity is also restricted by a Public Right of Way which extends across the site. The site is also allocated for residential development in the Local Plan. In light of these factors, it is considered that the agricultural use of the existing site has limited economic or other benefits and that the proposal will not result in the loss of a significant area of agricultural land. It is considered that the proposal does not conflict with guidance in paragraph 170(b) of the NPPF.

With regard to financial contributions, the Council formally introduced a Community Infrastructure Levy (CIL) on the 1st June 2019. The chargeable rate for qualifying dwellings will be £80 per square metre. Contributions from CIL will be used to fund highway infrastructure improvements in Moreton-in-Marsh and the provision of education infrastructure at Chipping Campden School. Gloucestershire County Council is also requesting S106 contributions towards pre-school and primary school education and library services which fall outside the scope of CIL. The requested contributions are £70,730, £260,245 and £13,132 respectively. The requested contributions are considered to be directly related to the proposed development, necessary to make the development acceptable in planning terms and fairly and reasonably related in scale and kind to the proposed development. The contributions are considered to accord with paragraph 122 of the Community Infrastructure Levy Regulations 2010.

In response to the request from Moreton-in-Marsh Town Council for a S106 contribution towards various works in the town, it must be noted that the Town Council will be able to claim 15% of CIL monies received from the proposed development to spend on infrastructure/services within the town. The financial contributions requested by the Town Council can therefore be addressed through CIL rather than the S106 process.

## **9. Conclusion:**

Overall, it is considered that the submitted details demonstrate that the application site can be developed for a residential development of the size proposed without having an adverse impact on the character or appearance of the SLA, drainage, residential amenity, biodiversity or archaeology. It is also considered that it has been reasonably demonstrated that the development can be undertaken without having an adverse impact on highway safety or the operation of the local highway network. Whilst the concerns of local residents regarding traffic generation are noted, the technical data submitted with the application demonstrates that the proposed development will not have an unacceptable highway impact. Gloucestershire County Council Highway Officers raise no objection to the application. It is therefore recommended that the application is granted permission subject to the completion of a S106 legal agreement/Unilateral

Undertakings covering the provision of affordable and self-build housing and contributions towards pre-school and primary education infrastructure and library services.

#### 10. Proposed conditions:

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).

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)

The development shall not be started before approval of the details relating to Appearance, Layout, Landscaping and Scale 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.

This decision relates to the land outlined in red on drawing and the access details shown on drawing 16.20.040/PL001 and the access details shown on drawing 16.20.040/PL004.

**Reason:** For purposes of clarity and for the avoidance of doubt.

No works shall commence on site until the proposed access off Evenlode Road including the new footway connection to the north has been provided in accordance with drawing no. 16.20.040/PL004, with the first 20m of the access road surfaced in a bound material and the existing roadside frontage boundaries have been set back to provide visibility splays extending from a point 2.4m back along the centre of the access measured from the public road carriageway edge (the X point) to a point on the nearer carriageway edge of the public road 54m Northbound and 50m Southbound (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 avoid an unacceptable impact on highway safety by ensuring that adequate visibility is provided and retained to ensure that a safe, suitable and secure means of access for all people that minimises the scope for conflict between traffic and cyclists and pedestrians in accordance with Local Plan Policy INF4 and Section 9 of the National Planning Policy Framework.

Prior to the first occupation of the development hereby permitted, a Travel Plan shall be submitted to and agreed in writing by the Local Planning Authority, setting out:

- i. objectives and targets for promoting sustainable travel;
- ii. appointment and funding of a travel plan coordinator;
- iii. details of an annual monitoring and review process;
- iv. means of funding of the travel plan, and;
- v. an implementation timetable including the responsible body for each action.

The approved Travel Plan shall be implemented fully in accordance with the details and timetable therein, and shall be continued thereafter, unless otherwise agreed in writing by the Local Planning Authority.

**Reason:** The development will generate additional traffic movements and to ensure that the appropriate opportunities to promote sustainable transport modes are taken up in accordance with Local Plan Policy INF3 and Section 9 of the National Planning Policy Framework.

The development hereby permitted shall not be occupied until a tactile pedestrian crossing at the junction of Wellington Road and Evenlode Road has been completed fully in accordance with details first agreed in writing by the Local Planning Authority.

**Reason:** To reduce potential highway safety impact by ensuring that a safe and suitable access is laid out and constructed that minimises the conflict between pedestrians, cyclists and vehicles in accordance with Local Plan Policies INF3 and INF4 and guidance in Section 9 of the National Planning Policy Framework.

No building on the development shall be occupied until the carriageway(s) (including surface water drainage/disposal, vehicular turning head(s) and street lighting) providing access from the nearest public highway to that dwelling have been completed to at least binder course level and the footway(s) to surface course level.

**Reason:** To minimise hazards and inconvenience for users of the development by ensuring that there is a safe, suitable and secure means of access for all people in accordance with Local Plan Policy INF4 and Section 9 of the National Planning Policy Framework.

Prior to first occupation of any dwelling hereby approved, details shall be submitted to, and agreed in writing by the Local Planning Authority, 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 in accordance with the approved details.

**Reason:** To ensure adequate water infrastructure provision is made on site for the local fire service to access and tackle any property fire in accordance with Section 9 of the National Planning Policy Framework.

Prior to the first occupation of any part of the development hereby approved, details of the arrangements for the future management and maintenance of the proposed streets within the development shall be submitted to and approved in writing by the Local Planning Authority. The streets shall thereafter be maintained fully 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 scope for conflict between traffic and cyclists and pedestrians in accordance with Local Plan Policies INF3 and INF4 and Section 9 of the National Planning Policy Framework.

Prior to the commencement of development, a Construction Method Statement (CMS) shall be submitted to and agreed in writing by the Local Planning Authority. The CMS shall include the following details:

- i. parking of vehicles for site operatives and visitors;
- ii. loading and unloading of plant and materials;
- iii. storage of plant and materials used in constructing the development;
- iv. provision and use of wheel washing facilities;
- v. provision of a construction vehicle routing strategy;

vi) hours of construction.

The development shall be undertaken fully in accordance with the agreed CMS.

**Reason:** To reduce the potential impact on the public highway and accommodate the efficient delivery of goods in accordance with Local Plan Policy INF4 and guidance in Section 9 of the National Planning Policy Framework.

Prior to the first occupation of the development hereby permitted, details of facilities to enable the charging of plug-in and other ultra-low emission vehicles, and a timetable for their implementation, shall be submitted to and approved in writing by the Local Planning Authority. The facilities shall be provided fully in accordance with the approved details and timetable.

**Reason:** To ensure that the development incorporates facilities for charging plug-in and other ultra-low emission vehicles in accordance with Local Plan Policy INF3 and guidance in Section 9 of the National Planning Policy Framework.

No development shall take place within the application site until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation, including a timetable for the submission of the findings, which has been submitted by the applicant and approved in writing by the Local Planning Authority.

**Reason:** To ensure that items of archaeological interest are properly recorded. Such items would potentially be lost if development was commenced prior to the implementation of a programme of archaeological work. It is therefore important that such a programme is agreed prior to the commencement of development.

Prior to the commencement of any works on site (including demolition and site clearance), a Hedgerow and Tree Protection Plan (HTPP) shall be submitted to and approved in writing by the Local Planning Authority.

The HTPP shall be a scaled drawing prepared by an arboriculturalist showing the finalised layout proposals, tree retention, tree/landscape protection measures and Construction Exclusion Zones (CEZs) - all in accordance with BS5837:2012 'Trees in relation to design, demolition and construction - recommendations'.

Tree protection measures shown on the HTPP must be put in place prior to the commencement of any works on site (including demolition and site clearance) and shall not be removed without the written approval of the Local Planning Authority.

Fires on sites should be avoided if possible. Where they are unavoidable, they should not be lit in a position where heat could affect foliage or branches. The potential size of the fire and the wind direction should be taken into account when determining its location, and it should be attended at all times until safe enough to leave. Existing ground levels must remain the same within CEZs and no building materials or surplus soil shall be stored therein. All service runs shall fall outside CEZs unless otherwise approved by the Local Planning Authority.

**Reason:** To safeguard the retained/protected tree(s) in accordance with Cotswold District Local Plan Policy EN7. It is important that these details are agreed prior to the commencement of development as works undertaken during the course of construction could have an adverse impact on the well-being of existing trees.

Prior to the commencement of development a surface water drainage scheme shall be submitted to and agreed in writing by the Local Planning Authority. The information submitted shall be in accordance with the principles set out in the Flood Risk & Drainage Statement Project Number 1389 October 25th 2018 unless otherwise agreed in writing by the Local Planning Authority. Before these details are submitted an assessment shall be carried out of the potential for disposing of surface water by means of a sustainable drainage system in accordance with the principles set out in The SuDS Manual, CIRIA C753 (or any subsequent version), and the results of the assessment provided to the Local Planning Authority. Where a sustainable drainage scheme is to be provided, the submitted details shall:

- i. provide information about the design storm period and intensity, the method employed to delay and control the surface water discharged from the site and the measures taken to prevent pollution of the receiving groundwater and/or surface waters;
- ii. include a timetable for its implementation; and
- iii. provide a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime.

The development shall be undertaken fully in accordance with the agreed details prior to the first occupation of the development hereby approved unless an alternative timeframe is first agreed in writing by the Local Planning Authority.

**Reason:** To ensure that the development is provided with a satisfactory means of drainage as well as to reduce the risk of creating or exacerbating a flooding problem and to minimise the risk of pollution for the lifetime of the development in accordance with Local Plan Policy EN14. It is important that these details are agreed prior to the commencement of development as any on site works could have implications for flooding and drainage in the locality.

No dwelling hereby approved shall be occupied until confirmation has been provided that either:- all wastewater network upgrades required to accommodate the additional flows from the development have been completed; or- a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.

**Reason:** The development may lead to sewage flooding and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional flows anticipated from the new development. Any necessary reinforcement works will be necessary in order to avoid sewer flooding and/or potential pollution incidents

Prior to the erection of any external walls at the development hereby permitted, a scheme to protect the proposed development from noise shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall ensure that the indoor ambient noise levels in living rooms and bedrooms meet the standards in BS 8233:2014 for the appropriate time period and that the external noise criteria of B8233:2014 is achieved as far as practically feasible.

No dwelling hereby approved shall be occupied until the measures agreed for that respective dwelling have been completed fully in accordance with the details approved by this condition.

**Reason:** In order to ensure that future residents are not subject to an unacceptable level of noise disturbance having regard to the proximity of the application site to a highway depot and an industrial estate and in accordance with Local Plan Policy EN15.

**Informatives:**

The Lead Local Flood Authority (LLFA) will give consideration to how the proposed sustainable drainage system can incorporate measures to help protect water quality; however pollution control is the responsibility of the Environment Agency

Future management of Sustainable Drainage Systems is a matter that will be dealt with by the Local Planning Authority and has not, therefore, been considered by the LLFA.

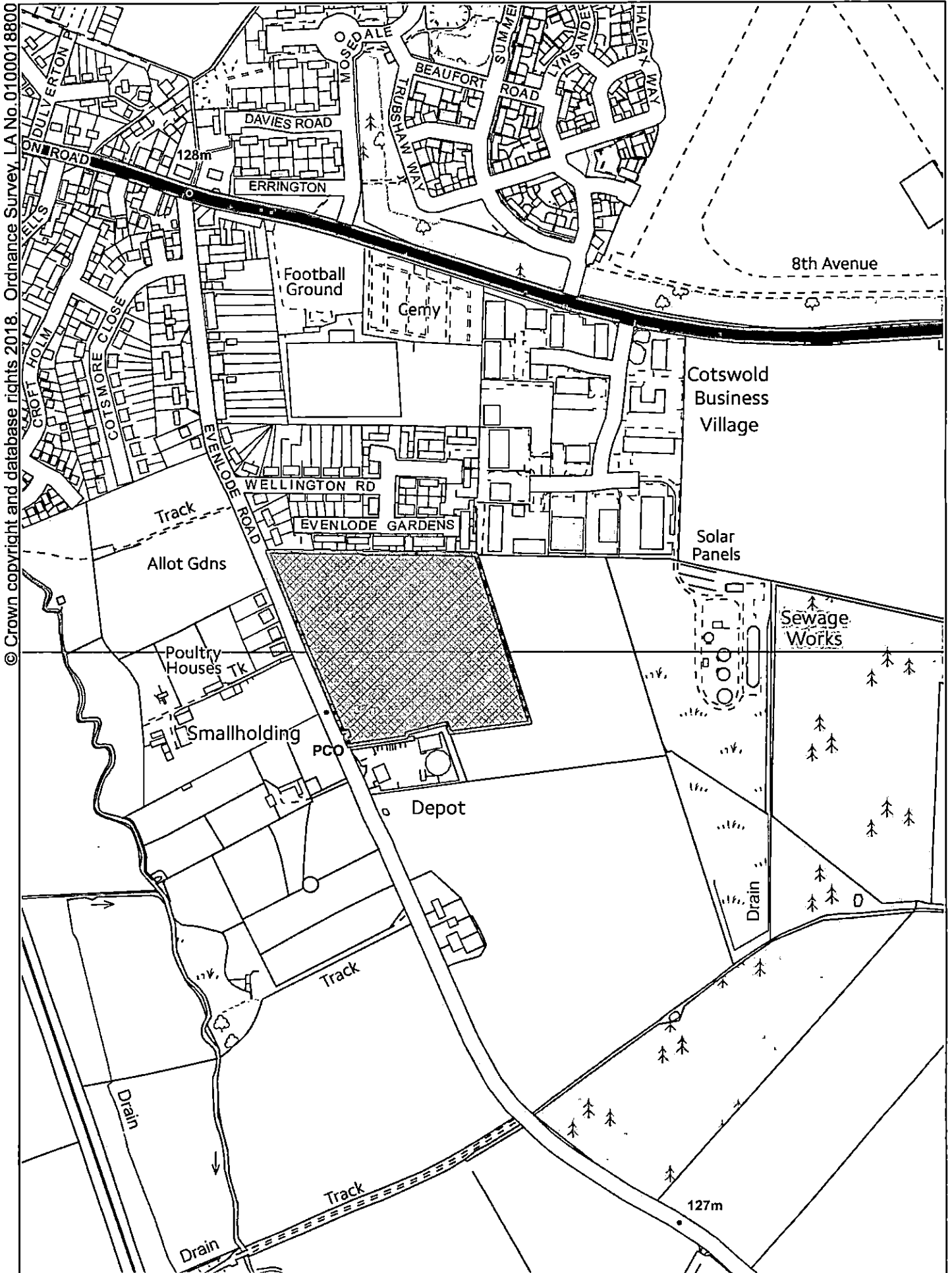
Any revised documentation will only be considered by the LLFA when resubmitted through suds@gloucestershire.gov.uk e-mail address. Please quote the planning application number in the subject field

The applicant is advised that to discharge Condition 10 that the Local Planning Authority requires a copy of a completed dedication agreement between the applicant and the Local Highway Authority or the constitution and details of a Private Management and Maintenance Company confirming funding, management and maintenance regimes.

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

The site is traversed by a Public Right of Way (HMM10) and this permission does not authorise additional use by motor vehicles, or obstruction, or diversion.





© Crown copyright and database rights 2018. Ordnance Survey, LA No. 0100018800

**LAND TO EAST OF EVENLODE ROAD MORETON IN MARSH** Scale: 1:5000

Organisation: Cotswold District Council

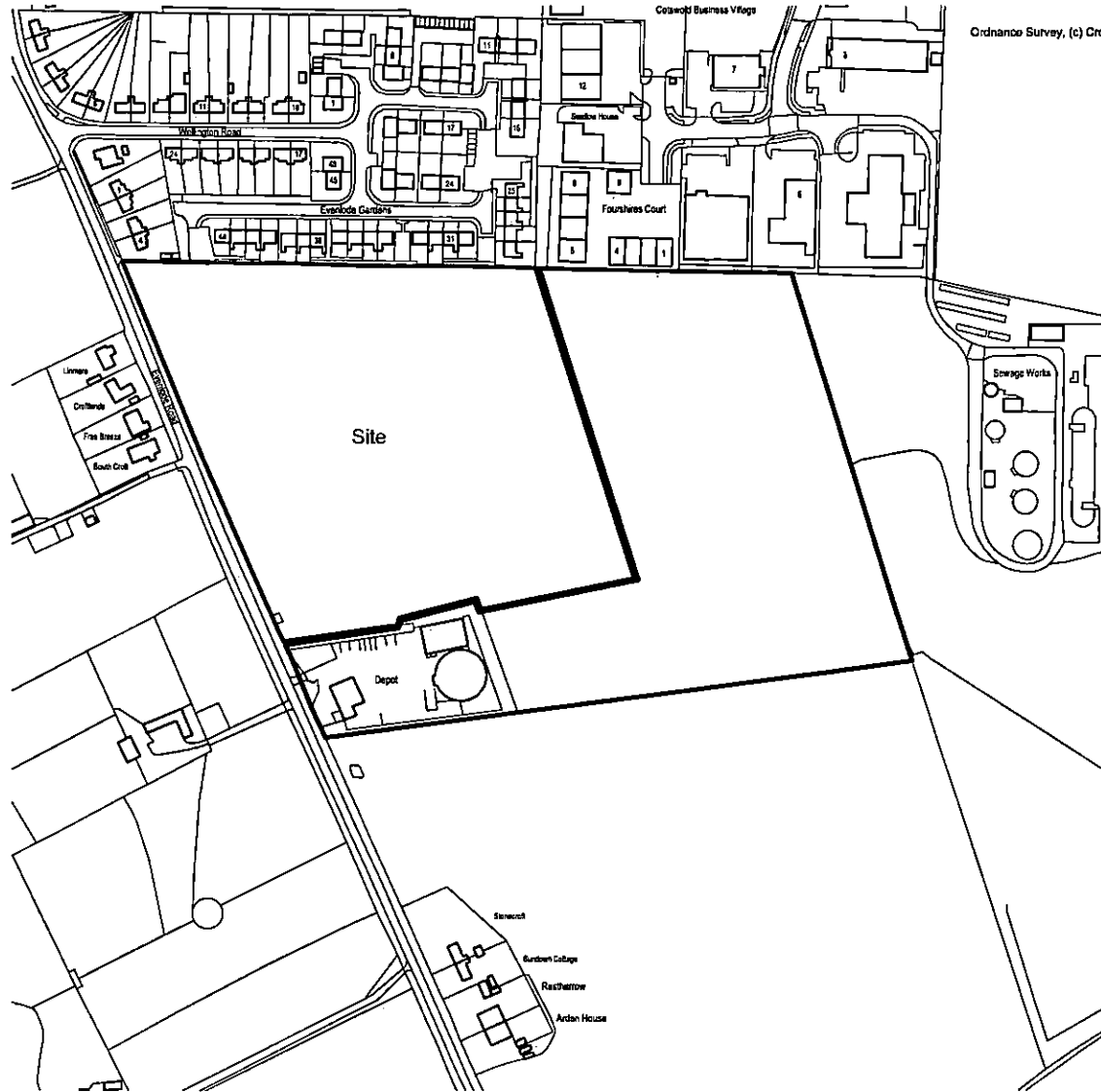
Department:

Date: 31/05/2019



**COTSWOLD**  
DISTRICT COUNCIL





Ordnance Survey, (c) Crown Copyright. All rights reserved. Licence number 100022432

35

19/08/2018



**coombes : everitt architects limited**  
 105-107 Bath Road  
 Cheltenham  
 Gloucestershire  
 GL53 7LE

t: 01242 807727 f: 0845 5575833  
 e: info@ce-architects.co.uk  
 www.ce-architects.co.uk

- Preliminary
- Feasibility
- Planning
- Building Regulations
- Tender
- Construction issue
- As Built



1. This drawing and content is copyright © of coombes : everitt architects limited and should not be copied without their prior written consent.
2. Do not scale drawing: all dimensions to be checked on site prior to construction and any discrepancies reported to contract administrator.
3. Do not use this drawing for setting out unless drawing specifically indicates setting out points.
4. Engineering information is indicative only and should be taken from structural engineers design.

Drawing title: Site Location Plan

Client: Gloucestershire County Council

Drawn by: AH Checked: JE

Project No: 16.20.040

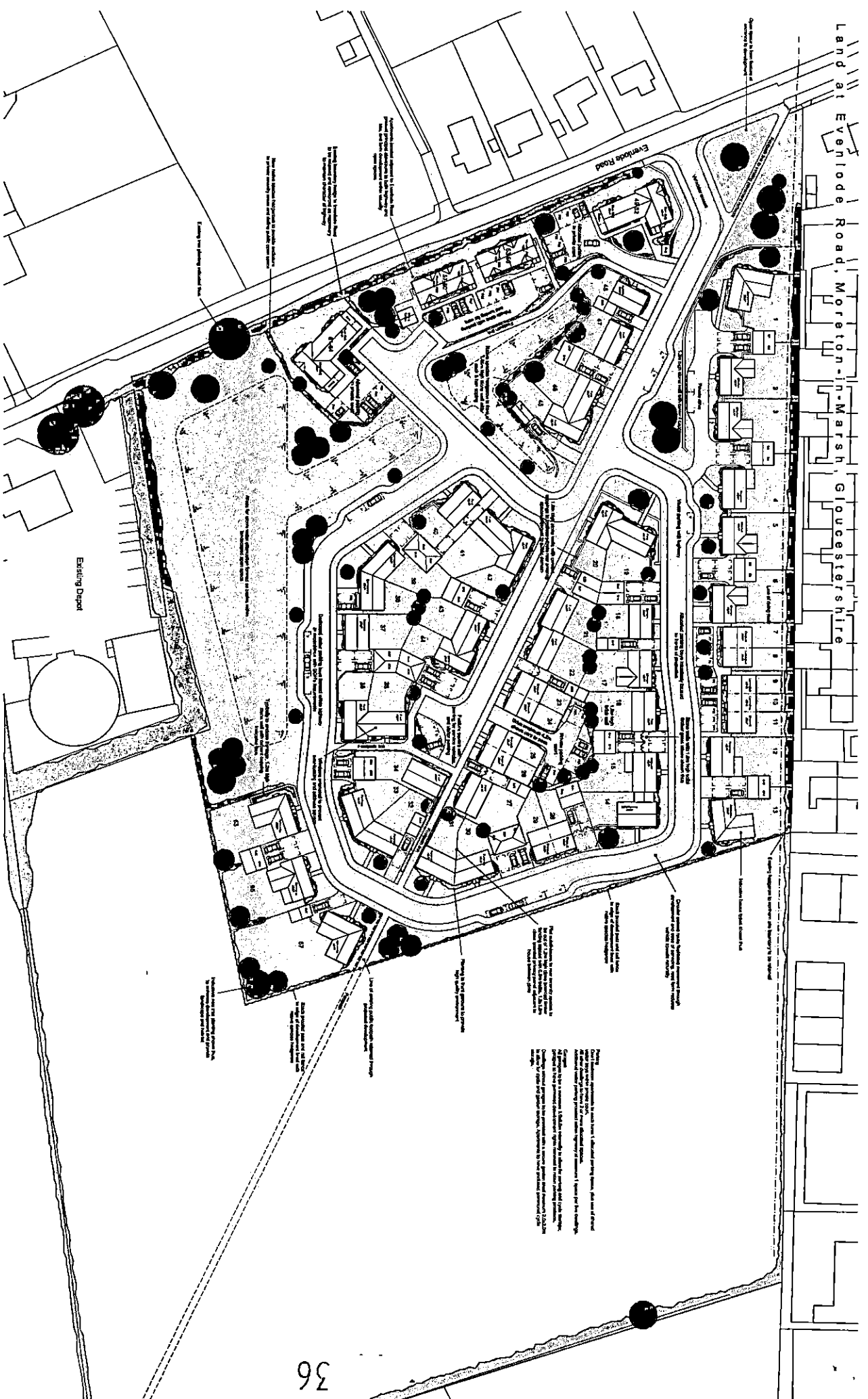
Project: Land at Evenlode Road, Moreton-in-Marsh, Gloucestershire

Scale: 1:2500 @ A3

Date: August 2018

Project / Drawing No: 16.20.040 / PL001

coombes : everitt architects



**coombes : event architects limited**  
 105-107 Bath Road  
 Cheltenham  
 Gloucestershire  
 GL53 7LE  
 t: 01242 807727 e: 01242 557533  
 e: info@coombes.co.uk  
 www.coombes.co.uk

- Preliminary
- Feasibility
- Planning
- Building Regulations
- Tender
- Construction Issue
- As Built

**RIBA**  
 1. The Architect certifies that this is a true and correct copy of the original drawing as submitted to the relevant authority.  
 2. The Architect certifies that this is a true and correct copy of the original drawing as submitted to the relevant authority.  
 3. The Architect certifies that this is a true and correct copy of the original drawing as submitted to the relevant authority.  
 4. The Architect certifies that this is a true and correct copy of the original drawing as submitted to the relevant authority.  
 5. The Architect certifies that this is a true and correct copy of the original drawing as submitted to the relevant authority.

Drawing Title:	Indicative Proposed Site	Project:	Land at Evenlode Road, Gloucestershire
Client:	Gloucestershire County Council	Scale:	1:200 @ A1
Drawn by:	AM / Checked: JE	Date:	August 2018
Project No.:	1620/040	Project / Drawing No.:	1620/040 / P1.004

19/02086/1047



## Planning Policy

For the avoidance of doubt this assessment has been undertaken in compliance with national and local planning policies which include the Cotswold District Local Plan 2011-2031. It is noted this site comprises the principle of allocation for a housing development of 63no. dwellings (M\_12A) under Policy S18 of the CDLP 2011-2031.

## Existing Site Conditions Accessibility

### 1.1 Public Transport provision

#### 1.1.1 Bus services

The closest bus stops to the site with services in both directions (westbound and eastbound) are located approximately 400m north of the site access close to the Evenlode road T-junction with London Road (an approximate 5 minute walk from the proposed site access).

The services that can be accessed from the bus stop are summarised below:

<b>Bus service at Wellington Inn</b>					
<b>Service no.</b>	<b>Route</b>	<b>Frequency</b>			
		<b>Mon-Fri</b>	<b>Sat</b>	<b>Sun</b>	
<b>V22</b>	Oddington – Chipping Norton	1 per day (on Tuesdays only)	No Service	No Service	
<b>V26</b>	Oddington – Sainsbury's	1 per day (on Mondays)	No Service	No Service	
<b>801</b>	Moreton-in-Marsh - Cheltenham	11 per day	11 per day	No Service	

#### 1.1.2 Rail services

The closest railway station to the site is Moreton-in-Marsh Railway Station, accessible by a 14 minute walk, four minute cycle ride or a nine minute bus journey via the 801 bus service. The station comprises 16no. bicycle parking stands and 137no. fee-payable car parking spaces.

Key destinations services are outlined below:

<b>Rail services from Moreton-in-Marsh station to key destinations</b>		
<b>Destination</b>	<b>Approx. no. trains per hour*</b>	<b>Journey time (mins)</b>
<b>Oxford</b>	2	40

<b>Worcester</b>	1	45
<b>London</b>	2	105
<b>Banbury</b>	2	80

\*During 0700 – 0900 weekdays

## **1.2 Access to sustainable transport modes**

### **1.2.1 Access by foot**

There is an existing public footpath that runs diagonally across the centre of the site (ref HMM10) which can be accessed via the site access, located on the north-west boundary of the site. Approximately 20 metres from the site entrance gate is a formal pedestrian footway along the eastern side of Evenlode Road which continues towards the T-junction with London Road. The footway is approximately 1.8m wide with existing street lighting.

There will be new footways at the site access leading into the development and various segregated footpath links within the site. The existing Public Rights of Way (PROW) through the site is to be retained with crossing points that meet the roads within the proposed development, providing a safe environment for pedestrians.

A new 2.0m wide section of footway will be provided to the north of the proposed site access to link the site with the existing provision on the eastern side of Evenlode Road from the point at which it currently ends (connecting the PROW). Footpath links are proposed to connect the existing footway network running through the site from north-west to south-east, providing an enhanced connection of pedestrian routes throughout the development.

### **Dropped kerbs on both side of the Evenlode Road T-junction side road crossing with Wellington Road**

Ensuring that there are dropped kerbs with tactile paving on both sides of the Evenlode Road T-junction with Wellington Road will provide an enhanced crossing facility for pedestrians travelling on the eastern side on Evenlode Road, particularly those with prams/wheelchairs. It is considered appropriate to provide dropped kerbs with tactile paving at this junction as the footway directly connects to the site access point.

### **1.2.2 Access by cycle**

There are limited formal cycle facilities available in the vicinity of the site however traffic volumes and collision data records indicates that there are no pre-existing safety concerns. Evenlode Road is designated as an on-road route on the National Cycle Network (NCN), which heads towards Moreton-in-Marsh railway station, located approximately 1.1km north-west of the proposed site access which is accessible via a 4 minute cycle journey. The route also runs close to the town centre High Street.

Overall, and in accordance with the 'Walking, cycling and Horse Riding Assessment Review' (WCHRA) set in the submitted TA, local facilities are generally easily accessible by pedestrians

and cyclists. With particular reference to vulnerable pedestrians, the majority of the footways on key routes are typically between 1.5m and 2.0m wide which provides appropriate width to allow a pedestrian to walk side by side with a pushchair or a wheelchair user. Thus, the site can be deemed sustainable in terms of appropriate connections to key local services.

### **1.3 Access and visibility splays details**

Access to the development will be made through Evenlode Road, a class 3 highway subject to a sign posted limit of 30mph. There is a pre-existing gate located at a north-western point of the site from Evenlode Road which connects to the existing PROW footpath and a gate located on a southern section of the above mentioned which could promote the principle of usage for vehicular access, however it is noted such matter is not stated in the submitted Transport Assessment. Further to the ATC count report, the acquired 85<sup>th</sup> %ile speeds were subject to 32.3mph Northbound and 33.6mph Southbound. These speeds correspond to 50m and 54m respectively. In accordance with the submitted drawing GL5026M-002 (Appendix G) attached to the TA, these splays distances can be accommodated at the site access point and I consider that this can be secured by an appropriately worded planning condition.

### **Trip generation**

Further to section 5.4 of the TA submitted with this application, the proposed trip rates for the site have been revised and updated as to reflect the location of the site and the type and tenure of dwellings that will be provided. The use of TRICS data to calculate the potential trip generation of a site is in line with industry best practice. In addition the sites used in the assessment (Wellington Road and Fosseway Avenue residential developments) have been picked to reflect the nature and locality of the proposed development. (As both of these residential developments only have one single point of access and are not through routes it can be concluded that all vehicle movements recorded are associated with those living at or visiting the developments. Based on a desktop review it has been calculated that Wellington Road provides access to 60 units with Fosseway Avenue providing access to approximately 248 units).

<b>Residential Development Donor Site Comparison Vehicle Trip Rate</b>						
	<b>AM Peak (08:00 – 09:00)</b>			<b>PM Peak (17:00 – 18:00)</b>		
	<b>Arrival</b>	<b>Departure</b>	<b>Two way</b>	<b>Arrival</b>	<b>Departure</b>	<b>Two way</b>
<b>Wellington Road Approx. 60 units</b>	0.167	0.317	0.483	0.333	0.250	0.583
<b>Fosseway Eve Approx. 248 units</b>	0.093	0.282	0.375	0.286	0.145	0.431

<b>Proposed Residential Development Person and Vehicle Trip Rate</b>									
	<b>AM peak (08:00 – 09:00)</b>			<b>PM peak (17:00 – 18:00)</b>			<b>Daily</b>		
	<b>Arrival</b>	<b>Departure</b>	<b>Two way</b>	<b>Arrival</b>	<b>Departure</b>	<b>Two way</b>	<b>Arrival</b>	<b>Departure</b>	<b>Two way</b>
<b>Person Trip Rate (per dwelling)</b>	0.224	0.739	0.963	0.532	0.233	0.765	0.756	0.972	1.728
<b>Person Trips (67 units)*</b>	15	50	65	36	16	51	51	65	116
<b>Vehicle Trip Rate (per dwelling)</b>	0.125	0.342	0.467	0.288	0.124	0.412	0.413	0.466	0.879
<b>Vehicle Trips (67 dwellings)*</b>	8	23	31	19	8	28	28	31	59

\*Due to rounding, two way total may not equal arrivals plus departures

The proposed trip rates for the development which have been calculated using the TRICS trip rate database are broadly consistent with those calculated by the two local donor sites. As such, it is considered that they are appropriate to inform the impact assessment undertaken within the submitted TA.

### **Assignment and distribution**

The likely route that the development traffic will take from the site has been calculated using 2011 Census Journey to Work data with route choice calculated using the Google Maps route planning facility. This is considered to be industry best practice and is in line with recommendations from the Highways Authority.

The proposal is perceived to lead to a net increase of 31 and 28 two-way movements through the A44 London Road junction during the morning and evening peak hours respectively. Traffic is perceived to disperse at the junction point of London Road with Evenlode Road at a rate of 86% and 14% towards London Road West (which is then divided into 49% heading towards the A429 High Street South and 37% heading towards A429 High Street North) and London Road East respectively.



### Capacity assessment

I note that TEMpro has been used in order to calculate the background traffic growth; however this should have been adjusted given the level of committed development in Moreton, which could result in higher flows comparison. No capacity assessment has been included in the supporting information; however the Highways Authority is aware of the impact of this development through the transport evidence base supporting the Local Plan.

A Junction Capacity Assessment has been commissioned by Cotswold District Council (CDC) to form part of the Local Plan 2011 – 2031 evidence base and to inform the Infrastructure Development Plan. The report considers the development impact on the principal network within the Cotswold District and identifies mitigation measures required to accommodate the level of development incorporated in the Local Plan.

Moreton-in-Marsh has been identified to accommodate an Employment site area of 9.16ha and an additional 208 dwellings, on which the proposed development falls under association. A429 (Roman Road)/ A44 (Oxford Street) and A429 (Roman Road)/A44 (Bourton Road) junctions are currently operating within capacity in accordance with Existing 2014 Traffic identified in the Cotswold Local Plan Highway Capacity Assessment (CLPHCA). The level of delay and queuing in both peaks periods is projected to increase as a result of the Local Plan development traffic. This results in the junctions operating near to capacity with Forecast 2031 and over capacity with Forecast 2031 and Preferred Development Traffic and with Forecast 2031, Preferred Development and Reserved Development Traffic scenarios as followed:

Junction Name	AM Peaks (08:00 – 09:00)			
	Impact of Committed Development (%)	Impact of Preferred Development (%)	Impact of Committed Development + Preferred Development (%)	Impact of Preferred Development + Reserved Development (%)
A429 (Roman Road)/A44 (Oxford Street)	24.2%	51.2%	62.3%	46.4%
A429 (Roman Road)/A44 (Bourton Road)	26.4%	51.4%	65.5%	48.5%

Junction Name	PM Peaks (17:00 – 18:00)			
	Impact of Committed Development (%)	Impact of Preferred Development (%)	Impact of Committed Development + Preferred Development (%)	Impact of Preferred Development + Reserved Development (%)
A429 (Roman Road)/A44 (Oxford Street)	25.3%	44.0%	57.8%	41.6%
A429 (Roman Road)/A44 (Bourton Road)	26.7%	42.9%	59.2%	42.4%

Cotswold Local Plan Highway Capacity Assessment Revised Report – October 2017

I note that as a result of the Revised Preferred Development (from April 2016 subject to 7.13ha employment area and 21 dwellings to 9.16ha and 208 respectively in October 2017) the development impact has increased at these junctions and the Committed Development + Preferred Development 2031 scenario will further exceed the capacity identified in 2016 (as per bellow table). Given that this junction already required mitigation, this scenario has not been reassessed in 2017.

Junction Name	AM Peak (08:00 – 09:00)			
	Existing Capacity	Com Dev Capacity 2031	Com Dev + Pref Dev 2031	Com Dev + Pref Dev + Res Dev 2031
	RFC unless stated/DoS = Degree of Saturation			
A429 (Roman Road)/A44 (Oxford Street)	0.74	0.96	1.15	1.24
A429 (Roman Road)/A44 (Bourton Road)	0.66	0.82	1.45	1.53

Junction Name	PM Peak (17:00 – 18:00)			
	Existing Capacity	Com Dev Capacity 2031	Com Dev + Pref Dev 2031	Com Dev + Pref Dev + Res Dev 2031
	RFC unless stated/DoS = Degree of Saturation			
A429 (Roman Road)/A44 (Oxford Street)	0.73	0.95	1.42	1.52
A429 (Roman Road)/A44 (Bourton Road)	0.69	0.87	1.02	1.20

#### Junction Capacity Assessment – April 2016

A junction is typically considered to be approaching capacity when it has a Ratio of Flow to Capacity (RFC) of 0.85 or more.

Budget Estimates have been calculated by Atkins on the premises of request by Cotswold District Council for the required mitigation schemes. The budget estimates include the following costs:

- Site clearance;
- Construction work;
- Traffic management;
- New road signage;
- Main contractor preliminaries (25%);
- Site investigation (1.5%);
- Detailed design (8%); and
- Contingency (20%)

Junction	Estimated Total Cost
A429 (Roman Road)/A44 (Oxford Street)	£870,000
A429 (Roman Road)/A44 (Bourton Road)	

Only a 20% contingency was allowed for and given the lack of detailed design identified from the detailed scheme from April 2016, it would be more appropriate to apply a 43% optimism bias which would bring the figure to £995,280 (April 2016). Assuming an average annual inflation rate of 3.03% this brings the estimated costs to £1,056,561.

The final allocations in the Local Plan were:-

## **MORETON-IN-MARSH**

### **Allocated housing development sites:**

- M\_12A Land at Evenlode Road (63 dwellings net)
- M\_19A and M\_19B Land south east of Fossey Avenue (91 dwellings (net) and 28 dwellings (net))
- M\_60 Former Hospital site (21 dwellings net)

### **Established employment sites:**

- Cotswolds Business Park/Village (EES32)
- Fossey Industrial Estate (EES33)

### **Allocated employment development site:**

- MOR\_E6 Fire Service College B (7ha) for B1 uses

Although not tested, the trip rates for the proposed 100 private dwellings of Fossey (ref 16/05258/FUL) were 67 vehicle movements in the peak morning period and 65 movements in the peak afternoon period, the allocation is for 119 dwellings, so vehicle movements could be closer to 80 and 77 respectively. The number of vehicle movements predicted to be generated by the proposed 50 sheltered housing units was 10 in the morning and 7 in the afternoon peak periods. The TA assumed a 50/50 split at the site access, so half of the traffic would go to and come from the south of the site and not use either of the junctions. Around 48% of the development traffic would use the A429/Bourton Road junction and 43% use the A429/Oxford Street (London Road) junction. Around 44 vehicles from the site would use A429/Oxford Street (London Road) junction in the morning peak period and 38 during the afternoon peak period.

According to the TA supporting Evenlode Road, the development would put an additional 27 movements on the A429/Oxford Street (London Road) junction in the morning and 23 in the afternoon.

I note the allocated site at the former hospital site (M\_60) was granted planning permission (ref 18/02595/FUL) on the 31<sup>st</sup> August 2018 and no contributions were sought for highway improvements.

It is assumed (from the Local Plan evidence base) that 7ha of B1 employment would have a developable area of around 50% (to allow for access roads, car parking, landscaping, etc.). The assumption is that the offices will have an average of 2 floors:-

7 ha = 70,000 sqm.

Assuming 35,000 sqm developable (50% density), x 2 floors = 70,000 sqm =

210 Departures, 1560 Arrivals AM

1253 Departures, 210 Arrivals PM

The assumption that there would be a 50/50 split at the site access onto London Road, the employment allocation will put an additional 885 vehicles on the junction in the morning and 730 in the afternoon.

Proportional impact would be (based on the average of the 2 peak periods):-

Evenlode Road (GCC)	2.8%	25 movements
Fosseway allocation	4.7%	41 movements
London Road allocation	92.4%	808 movements
Total	100%	874 movements

On this basis that the costs of the improvements will be £1,057,000, the contributions under section 106 would be:-

<b>Evenlode Road (GCC)</b>	<b>£29,596</b>
<b>Fosseway allocation</b>	<b>£49,679</b>
<b>London Road allocation</b>	<b>£976,668</b>

### Accident analysis

A review of the accident data from the latest five year period identifies there has been no recorded personal injury accidents within the vicinity of the site on Evenlode Road to evidence that there is an existing highway safety issue that could be exacerbated by the additional development traffic.

### Parking

I have given consideration to the various objection comments associated with this application, which underline the existent parking concerns of local residents (high levels of on-street parking, lack of parking provision and traffic flows associated with this proposal).

Gloucestershire County Council has offered the Town Council the support in order to carry out a consultation exercise to determine whether a Traffic Regulation Order (TRO) would be a suitable tool in respect of the traffic flows along Evenlode Road. This offer is not co-related to this application, but a gesture of good will given the local concern that has been raised over parking along Evenlode Road. However it should be noted that if parking restrictions were implemented then the existing parking would be displaced onto another part of the local road network and this would also need to be considered. Although I appreciate the raised concerns in relation to on-street parking on Evenlode Road, there is no recorded data of any accidents which could substantiate a safety concern of the existing arrangements, this matter relates to

inconvenience for future and local residents as informal give-away sections are envisioned to take place. The delay to vehicles that is likely to occur as result of the aforementioned on street parking and development traffic flows is not so significant to justify dependency on a traffic regulation order to prevent the on street parking that currently occurs.

In accordance with section 2 of the TA, it is stated that vehicles are currently 'delayed' by between four and ten seconds over the 499m stretch of Evenlode Road when compared to an unimpeded vehicle travelling at 20mph, which is not significantly material.

With respect to the parking provision and demand associated with the application, the Highways Authority is satisfied that the parking provision is able to accommodate the additional vehicles on site with no necessity of displacement to Evenlode Road. Furthermore, any visitor parking that would be likely to occur as a result of the development proposal can be accommodated within the new estate roads that will form part of future reserved matters applications should the development be granted planning permission.

### **Illustrative Layout**

I note the submitted illustrative layout denotes the level of consideration given to the proposal in relation to the levels of parking and access. Even though such arrangements will be dealt with at a reserved matters stage, the proposed layout is perceived to comprehensively accommodate future parking needs of residents, visitors and secure existing rights of way, and I will secure relatable matters through means of condition.

### **Travel Plan**

The TA enhances the Travel Plan will be provided at the development through measures of management and maintenance from GCC, and further indicative baseline targets will be agreed as part of the outline Travel Plan secured by way of planning obligation or similar agreement. In accordance with Policy 111 of the National Planning Policy Framework, the development which generates significant amount of movements should be required to provide a travel plan, however in accordance with Policy 56 of the same document, the implementation of the same obligation is not perceived necessary to make the development acceptable, therefore the submission and further implementation of the Travel Plan will be secured through condition.

### **Recommendation:**

**The highways authority recommends no highway objection to be raised subject to the following conditions and obligations attached to any permission granted:-**

### **Obligations**

<b>Obligation Type</b>	<b>Policy Context &amp; other relevant references</b>	<b>Basis of Need</b>	<b>Policy/CIL Compliance</b>
£29,596 A429 (Roman Road)/A44	Paragraph 108 of the Framework.	To improve the operational capacity at the	(a) Necessary to make the development acceptable in

<p>(Oxford Street) and A429 (Roman Road)/A44 (Bourton Road) junction improvements</p>	<p>Policy INF4 Cotswold District Local Plan 2011-2031</p>	<p>junction in accordance with the level of committed and preferred development in the Local Plan.</p>	<p>planning terms;</p> <p>Paragraph 108 of the Framework requires for any significant impact from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.</p> <p>(b) Directly related to the development;</p> <p>The Obligation will be used towards operational capacity improvements which relate directly to the proportional impact of the development.</p> <p>(c) Fairly and reasonable related in scale and kind to the development;</p> <p>The Obligation has been supported by an estimate of the cost of works including contingency and the estimated cost of the improvements is not a significant cost taking into consideration the size of the development and the number of potential vehicular trips.</p>
---	---	--	--

## **Conditions**

**1. No works shall commence on site until the proposed access off Evenlode Road including the new footway connection to the north has been provided in accordance with plan ref 16.20.040/SK014, with the first 20m of the access road surfaced in a bound material and the existing roadside frontage boundaries have been set back to provide visibility splays extending from a point 2.4m back along the centre of the access measured from the public road carriageway edge (the X point) to a point on the nearer carriageway edge of the public road 54m Northbound and 50m Southbound (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 avoid an unacceptable impact on highway safety by ensuring that adequate visibility is provided and maintained to ensure that a safe, suitable and secure means of access for all people that minimises the scope for conflict between traffic and cyclists and pedestrians is provided in accordance with paragraphs 108 and 110 of the National Planning Policy Framework.

**2. Prior to occupation of the development hereby permitted, a Travel Plan shall be submitted to and agreed in writing by the Local Planning Authority, setting out;**

- i. objectives and targets for promoting sustainable travel,**
- ii. appointment and funding of a travel plan coordinator,**
- iii. details of an annual monitoring and review process,**
- iv. means of funding of the travel plan, and;**
- v. an implementation timetable including the responsible body for each action.**

**The approved Travel Plan shall be implemented in accordance with the details and timetable therein, and shall be continued thereafter, unless otherwise agreed in writing by the Local Planning Authority.**

Reason:- The development will generate a significant amount of movement and to ensure that the appropriate opportunities to promote sustainable transport modes are taken up in accordance with paragraphs 108 and 111 of the National Planning Policy Framework.

**3. The development hereby permitted shall not be occupied until a tactile pedestrian crossing at Wellington Road and Evenlode Road junction has been completed in accordance with details to be agreed advance by the Local Planning Authority.**

Reason: - To reduce potential highway safety impact by ensuring that a safe and suitable access is laid out and constructed that minimises the conflict between pedestrians, cyclists and vehicles in accordance with paragraph 108 and 110 of the National Planning Policy Framework.



**4. No building on the development shall be occupied until the carriageway(s) (including surface water drainage/disposal, vehicular turning head(s) and street lighting) providing access from the nearest public highway to that dwelling have been completed to at least binder course level and the footway(s) to surface course level.**

Reason: - To minimise hazards and inconvenience for users of the development by ensuring that there is a safe, suitable and secure means of access for all people that minimises the conflict between traffic and cyclists and pedestrians in accordance with the NPPF.

**5. No above ground works shall commence on site until a scheme has been 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 Council.**

Reason: To ensure adequate water infrastructure provision is made on site for the local fire service to access and tackle any property fire in accordance with paragraph 110 of the National Planning Policy Framework.

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

Reason:- To ensure that a safe, suitable and secure means of access for all people that minimises the conflict between traffic and cyclists and pedestrians is provided in accordance with the NPPF.

**7. Prior to occupation details of the proposed arrangements for future management and maintenance of the proposed streets within the development shall be 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 scope for conflict between traffic and cyclists and pedestrians in accordance with paragraph 108 and 110 the National Planning Policy 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 127 of the Framework.

**8. Throughout the construction period of the development hereby permitted provision shall be within the site that is sufficient to accommodate the likely demand generated for the following:**

- i. parking of vehicles of site operatives and visitors;**
- ii. loading and unloading of plant and materials;**

**iii. storage of plant and materials used in constructing the development;**

**iv. provide for wheel washing facilities;**

**v. provide for construction vehicle routing strategy;**

Reason: To reduce the potential impact on the public highway and accommodate the efficient delivery of goods in accordance with paragraph 110 of the National Planning Policy Framework.

**9. Prior to the occupation of the development hereby permitted, the proposed car parking spaces shall be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.**

Reason: - To ensure that the development incorporates facilities for charging plug-in and other ultra-low emission vehicles in accordance with paragraph 110 of the National Planning Policy Framework.

**10. The development hereby permitted shall not be occupied until details of secure and covered cycle storage facilities have been made available in accordance with details to be submitted to and approved in writing by the LPA.**

Reason:- To give priority to cycle movements by ensuring that adequate cycle parking is provided, to promote cycle use and to ensure that the appropriate opportunities for sustainable transport modes have been taken up in accordance with paragraph 108 of the National Planning Policy Framework.

NOTE: The applicant is advised that to discharge condition 7 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.

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

NOTE: For avoidance of doubt the submitted layout plan ref 16.20.040/SK014 has been treated as being for illustrative purposes only.

NOTE: The site is traversed by a public right of way and this permission does not authorise additional use by motor vehicles, or obstruction, or diversion.

**NOTE: Should the Local Planning Authority be mindful to grant planning consent after the implementation of the Community Infrastructure Levy, the obligations incorporated within this recommendation may be subject to review, and I would therefore request further consultation on this basis.**

**Statement of Due Regard**

Consideration has been given as to whether any inequality and community impact will be created by the transport and highway impacts of the proposed development. It is considered that no inequality is caused to those people who had previously utilised those sections of the existing transport network that are likely to be impacted on by the proposed development.

It is considered that the following protected groups will not be affected by the transport impacts of the proposed development: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation, other groups (such as long term unemployed), social-economically deprived groups, community cohesion, and human rights.

Yours sincerely,

*Jose Nunes dos Santos*

Technician