COTSWOLD
District Council

3 February 2026

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PLANNING AND LICENSING COMMITTEE

A meeting of the Planning and Licensing Committee will be held in the Council Chamber - Council Offices, Trinity Road, Cirencester, GL7 1PX on **Wednesday, 11 February 2026 at 2.00 pm.**

Jane Portman
Chief Executive

To: Members of the Planning and Licensing Committee
(Councillors Dilys Neill, Ian Watson, Ray Brassington, Nick Bridges, Patrick Coleman, Daryl Corps, David Fowles, Joe Harris, Julia Judd and Michael Vann)

Recording of Proceedings – The law allows the public proceedings of Council, Cabinet, and Committee Meetings to be recorded, which includes filming as well as audio-recording. Photography is also permitted.

As a matter of courtesy, if you intend to record any part of the proceedings please let the Committee Administrator know prior to the date of the meeting.

AGENDA

1. **Apologies**
   To receive any apologies for absence. The quorum for the Planning and Licensing Committee is 3 members.

2. **Substitute Members**
   To note details of any substitution arrangements in place for the meeting.

3. **Declarations of Interest**
   To receive any declarations of interest from Members relating to items to be considered at the meeting.

4. **Minutes** (Pages 7 - 20)
   To confirm the minutes of the meeting of the Committee held on 14 January 2026.

5. **Chair's Announcements**
   To receive any announcements from the Chair of the Planning and Licensing Committee.

6. **Public questions**
   A maximum of 15 minutes is allocated for an "open forum" of public questions at committee meetings. No person may ask more than two questions (including supplementary questions) and no more than two such questions may be asked on behalf of one organisation. The maximum length of oral questions or supplementary questions by the public will be one minute. Questions must relate to the responsibilities of the Committee but questions in this section cannot relate to applications for determination at the meeting.

   The response may take the form of:
   a) A direct oral response (maximum length: 2 minutes);
   b) Where the desired information is in a publication of the Council or other published work, a reference to that publication; or
   c) Where the reply cannot conveniently be given orally, a written answer circulated later to the questioner.

7. **Member questions**
   A maximum period of fifteen minutes is allowed for Member questions. Questions must be directed to the Chair and must relate to the remit of the Committee but may not relate to applications for determination at the meeting.

Questions will be asked in the order in which they were received but the Chair may group together similar questions.

The deadline for submitting questions is 5.00pm on the working day before the day of the meeting unless the Chair agrees that the question relates to an urgent matter, in which case the deadline is 9.30am on the day of the meeting.

A member may submit no more than two questions. At the meeting the member may ask a supplementary question arising directly from the original question or the reply. The maximum length of a supplementary question is one minute.

The response to a question or supplementary question may take the form of:

a) A direct oral response (maximum length: 2 minutes);
b) Where the desired information is in a publication of the Council or other published work, a reference to that publication; or
c) Where the reply cannot conveniently be given orally, a written answer circulated later to the questioner.

Schedule of Applications

To consider and determine the applications contained within the enclosed schedule:

8. **25/02983/OUT - Land North of Folly View, Willersey** (Pages 23 - 124)

Proposal
Outline application for the erection of up to 30 dwellings

Case Officer
Martin Perks

Ward Members
Councillor Gina Blomefield and Councillor Tom Stowe

Recommendation
PERMIT subject to completion of S106 legal agreement(s) covering financial contributions to secondary education, library services and community transport, the provision of affordable housing and self-build/custom build housing, and financial contributions to Willersey Parish Council for improvements to the village hall, recreation ground and cemetery.

9. **25/03122/FUL - Wyck Hill Farm Racing Stables, Stow-on-the-Wold** (Pages 125 - 192)

Proposal
Proposed re-location of stable yard including provision of new access, new buildings and siting of a mobile home.

Case Officer
Martin Perks

Ward Member
Councillor Dilys Neill

Recommendation
PERMIT subject to completion of S106 legal agreement covering Biodiversity Net Gain

10. **24/02513/FUL - Siddington Park, Cirencester** (Pages 193 - 310)

Proposal
Development of land and erection of buildings to expand an existing Integrated Retirement Community (Use Class C2)

Case Officer
Andrew Moody

Ward Member
Councillor Mike Evemy

Recommendation
PERMIT SUBJECT TO THE COMPLETION OF A SECTION 106 LEGAL AGREEMENT FOR THE PAYMENT OF FINANCIAL CONTRIBUTIONS TOWARDS LIBRARY FACILITIES AND TRAVEL PLAN; ALSO THE PAYMENT OF THE FINANCIAL CONTRIBUTION TO MITIGATE THE IMPACT OF THE DEVELOPMENT UPON THE NORTH MEADOW AND CLATTINGER FARM SPECIAL AREA OF CONSERVATION

11. **Proposed reforms to the National Planning Policy Framework (NPPF)** (Pages 311 - 402)

Purpose:
To advise Planning and Licensing Committee of the current NPPF consultation, agree the consultation response on behalf of the Council and to seek delegated authority to respond to a second consultation on Design and Placemaking guidance.

Recommendations:
That the Planning and Licencing Committee resolves to:

1. Grant delegated authority to the Director of Communities and Place to make the final submission of comments on the consultation, having regard to further comments made by the committee at and after the meeting and

in consultation with the Cabinet Member for Housing and Planning, and

2. Grant delegated authority to the Director of Communities and Place in consultation with the Cabinet Member for Housing and Planning to submit comments on recent consultation on Design and Placemaking Planning Practice Guidance – Public Consultation.

12. **Sites Inspection Briefing**
Members for 4 March 2026 (if required)

Councillors Dilys Neill, Ian Watson, Ray Brassington, Daryl Corps, Michael Vann

13. **Licensing Sub-Committee**
Members for 26 February 2026 (if required)

Councillors Ian Watson, Julia Judd, Michael Vann

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COTSWOLD
District Council

Minutes of a meeting of Planning and Licensing Committee held on Wednesday, 14 January 2026

Members present:

Dilys Neill (Chair)	Ian Watson (Vice Chair)	
Ray Brassington	Daryl Corps	Julia Judd
Patrick Coleman	David Fowles	Michael Vann

Officers present:

Justin Ayton, Senior Conservation and Design Officer
Harrison Bowley, Head of Planning Services
Laurie Davis, Senior Conservation & Design Officer
Julia Gibson, Democratic Services Officer
Amy Hill, Senior Planning Officer
Tyler Jardine, Trainee Democratic Services Officer
Geraldine LeCointe, Assistant Director - Planning Services
Andrew Moody, Senior Planning Officer
Kira Thompson, Election and Democratic Services Support Assistant
Andrea Thomas, Licensing Officer
Leonie Woodward, Head of Legal

Councillor Andrea Pellegram

224 Apologies

There were apologies for absence from Councillor Nick Bridges.

225 Substitute Members

There were no substitute Members.

226 Declarations of Interest

2:05 Councillor Fowles arrived at the Chamber.
Councillor Brassington declared that he lived in close proximity to application 24/02513/FUL.
Councillor Julia Judd declared that she had known the applicant for 25/02175/FUL approximately 17 years ago but approached the application with an open mind.

Councillor Fowles declared an interest as the Coln Valley Ward Member and confirmed that he approached the application, 25/02175/FUL, with an open mind whilst representing residents' views.
Councillor Coleman declared an interest as a member of Cirencester Town Council and its Planning Committee in relation to application 25/02763/REM. He had not played a significant role in the Town Council's response and had no predetermined view.

227 Minutes

The minutes of the meeting held on 10 December 2025 were discussed. Councillor David Fowles proposed accepting the minutes and Councillor Ray Brassington seconded the proposal which was put to the vote and agreed by the Committee.
RESOLVED: To APPROVE the minutes of the meeting held on 10 December 2025.

Minutes 10 December 2025 (Resolution)		
For	Ray Brassington, Patrick Coleman, Daryl Corps, David Fowles, Julia Judd, Dilys Neill and Michael Vann	7
Against	None	0
Conflict Of Interests	None	0
Abstain	Ian Watson	1
Carried		

228 Chair's Announcements

The Chair announced that the planning lunch had been postponed until later in the year.

229 Public questions

There were no public questions.

230 Member questions

There were no Member questions.

231 New Fee for Primate Licenses

The purpose of the report was to seek approval to implement a fee for primate licensing applications.

The report was presented by Councillor Andrea Pellegram, Cabinet Member for Environment and Regulatory Services and Andrea Thomas, Licensing Officer, who made the following points:

- Fees for Primate Keeper Licences were introduced under the Animal Welfare (Primate Licences) (England) Regulations 2024. The regulations came into force on 6 April 2025, and it was noted that from 6 April 2026 it would be an offence to keep a primate without a licence.
- Provision existed to renew, vary, surrender, or revoke a licence, with inspections included.
- Proposed fees aligned with similar licensing regimes (e.g. horse-riding establishments).
- Proposed fees:
    - £530 for a new licence, £364 for a renewal, £30 for a variation
- Fees would be reviewed annually.

In discussion and questioning the following points were made:

- No primates were currently known to require a licence in the District.
- Plans were to contact local vets to identify any primates that may need licensing.
- If a primate was discovered and the keeper did not obtain a licence, the Council had enforcement powers, including prosecutions, rectification notices, or licence revocation/variation.

Councillor Ian Watson proposed supporting the recommendations in the New Primate Licencing report. Councillor Julia Judd seconded the proposal
which was put to the vote and agreed by the Committee.
RESOLVED: To PERMIT the application.

New Fee for Primate Licences (Resolution)		
For	Ray Brassington, Patrick Coleman, Daryl Corps, David Fowles, Julia Judd, Dilys Neill, Michael Vann and Ian Watson	8
Against	None	0
Conflict Of Interests	None	0
Abstain	None	0
Carried		

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232 25/02763/REM - Chesterton Farm

Reserved Matters pursuant to outline permission 16/00054/OUT relating to appearance, layout, landscaping and scale for the erection of 100 dwellings.

Case Officer: Julian Pye
Ward Member: Councillor Andrea Pellegram

Officer recommendation: APPROVAL OF RESERVED MATTERS SUBJECT TO CONDITIONS.

The Chair invited the Case Officer to introduce the application who made the following points:

- Updates and additional representations were included on the late pages, mainly relating to revised materials and conditions.
- A consolidated list of submitted plans was provided, along with suggested updates to conditions attached to the recommendation.
- The proposal concerned reserved matters pursuant to the outline permission for the development and erection of 100 dwellings, associated landscaping, and public open space for Phase/Subphase 2A.
- The submission effectively discharged conditions C11, 16 18 ,48 56 of the outline permission.
- The Case Officer gave an overview of the previous outline planning permission and planning framework, including the overarching, vision, parameter plans, development phasing, Site Wide Design Code (condition 9) and delivery strategy. In respect of sub Phase 2, the key issues for consideration included, design iteration/revised plans, layout, scale and massing plan, housing mix plans, elevations, street scenes, 3D visuals, materiality plan, landscaping, energy and sustainability, consultations.

Speaker 1 – Cirencester Town Councillor Andy Jopp
Cirencester Town Council had objected to the Reserved Matters application at its Planning Committee meeting on 18 November 2025. Concerns raised by the Conservation Officer had been addressed, and Gloucestershire Highways had withdrawn their objection. However, the Gloucestershire Constabulary's objection remained, particularly regarding safety and the potential fear of crime associated within 'Parking Courts' at the rear of properties. No Solar PV panels, air source heat pumps, or battery storage had been included in the plans. The Energy and Sustainability Statement assessed what may be appropriate but did not commit to provision; therefore, the objection on this matter was maintained.

Speaker 2 – Ben Leather – Applicant
The applicant explained that the site benefitted from outline permission and agreed design codes, which provided parameters and guidance for high-quality homes. The development contributed to the Council's housing target with 31 affordable homes. Amendments had been made to the eastern entrance to the Steadings plan. All homes would be electric-only, exceeding current building requirements, and including air source heat pumps and solar PV cells.

Member Questions:
Members asked questions of the officers, who responded in the following way:

- 'Designing Out Crime' comments were a material consideration but must be balanced against the approved outline principles and consistency with earlier

phases. Private gardens were appropriately enclosed to ensure resident privacy. Adequate parking provision was included, with revisions made to parking and amenity areas. Rear parking courts were necessary to deliver terraced housing and maintain the primary village street required by the Outline Permission. The design of parking courts had been carefully considered, including surveillance, lighting, and environmental quality.

- Officers confirmed that lighting and the quality of shared parking spaces had been carefully considered, drawing on experience from Subphase 1A, and provided assurance that these spaces would be appropriately designed and lit. It was noted that poorly designed parking courts could discourage use and undermine schemes.
- The recommendation proposed delegated authority for officers to finalise the references to updated plans and the list of conditions. Ongoing engagement with the applicant and consultees was noted, providing assurance that any minor outstanding matters were being addressed.
- Condition 13 was discussed in relation to energy provision. Officers confirmed that all dwellings would rely on air source heat pumps, as shown on the submitted plans. It was noted that photovoltaic panels may not be suitable on every dwelling due to roof orientation and efficiency. Officers proposed that the condition required development to be carried out in accordance with the submitted detailed energy strategy identifying the locations of air source heat pumps and photovoltaic panels, where appropriate. Members supported strengthening the condition to secure this information in writing.
- Officers advised that experience from other local developments had informed ongoing negotiations on new schemes. Key traditional elements were retained, including appropriate materials, built form, roof pitches, chimneys, window hierarchy, and boundary treatments, whilst incorporating simplified detailing and larger window proportions to create a cohesive and successful public realm.
- The wider development (The Steadings) included approximately 40 hectares of public open space along with play areas and sports provision. The overall aspiration remained to achieve a 10% biodiversity net gain across the development as a whole, with the Outline Permission allowing for variation between individual phases and parcels in line with the agreed delivery strategy.
- Whilst functional chimneys would have been preferable, they could not be required. Including chimneys into the roofscape was considered an important and integral design element, contributing to a positive response to the traditional character and adding visual interest.
- A refuse collection strategy plan had been submitted and formed part of the approved plans. The Highway Authority had reviewed the strategy, including swept path and vehicle tracking analysis for refuse vehicles, and was satisfied.
- The Community Management Trust would oversee the long-term management of public realm and amenities across the site. The trust was in its early stages, and residents would be expected to make a financial contribution towards its future responsibilities.

Member Comments:

- Members noted the police comments on defensible space and buildings facing inwards, emphasizing the need to create safe, liveable communities.
- Members welcomed the variation in building heights and textures shown in the plans.
- It was noted that green spaces were important for residents' recreation, including dog walking.
- Concerns were raised to ensure that the Community Management Trust would be responsible for maintaining subsequent phases of the development.

Councillor Patrick Coleman proposed and Councillor Ian Watson seconded the proposal approve the reserve matters subject to the conditions and allowing delegated authority to make minor adjustments to the conditions. The proposal was put to the vote and agreed by the Committee.
RESOLVED: To PERMIT the application.

15:46 – 15:56 Break

25/02763/REM - Chesterton Farm - PERMIT (Resolution)		
For	Patrick Coleman, Daryl Corps, David Fowles, Julia Judd, Dilys Neill, Michael Vann and Ian Watson	7
Against	None	0
Conflict Of Interests	None	0
Abstain	Ray Brassington	1
Carried		

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233 25/02175/FUL Thyme - Southrop Estate Office

The proposal was for the erection of 3 new structures and associated landscaping to provide additional spa facilities and hotel accommodation.

Case Officer: Amy Hill
Ward Member: Councillor David Fowles
Officer Recommendation: PERMIT

The Chair invited the Case Officer to introduce the application who made the following points:

- Further comments had been received in the late pages, including a letter of support, an additional objection, and information from the agent providing public footpath viewpoints and photo montages.

- Shared site location, aerial photographs, tithe maps site boundaries, photographs from various directions, elevations plans.

Public Speakers

Speaker 1 – Southrop Parish Council – Councillor Timothy Guest

Southrop Parish Council confirmed that their previously submitted statement reflected their unanimous view and remained unchanged. Whilst recognising the applicant's rationale to increase room numbers and local employment benefits, the Parish Council raised concerns about impacts on residents' enjoyment of the village, protection of heritage assets, and potential construction disruption. They did not oppose the application in principle but requested mitigation through design changes and enforceable conditions.

Speaker 2 - Objector - Jonathan Turnock

The objector reiterated concerns regarding visual impact, design, and proximity to listed buildings. Concern was raised about the proposed hotel accommodation block being overly dense, forming a hard edge to the village, and dominating views from public footpaths. The proximity of new buildings to the Dovecote, Newman's House, and other listed structures was highlighted, with potential harm to the conservation area and the significance of these heritage assets. The objector concluded that the development would result in substantial and permanent heritage harm, including the loss of a green gap, negative visual impact, inappropriate density and design, and loss of historic legibility, and urged the Committee to refuse the application in accordance with the 1990 Planning Act and local plan policies EN1, EN10, and EN11.

Speaker 3 – Supporter – Kirsty Wills

The supporter highlighted their long-term residence in Southrop and personal experience with the business. They emphasised the positive local impact of Thyme, including year-round employment, use of local suppliers, support for community events, and contribution to the village's heritage and landscape. The supporter noted that the proposed development would have minimal impact on traffic and neighbouring properties, and would be in keeping with the village character.

Speaker 4 – Applicant - Camilla Hibbert

The applicant noted the restoration of the derelict farmstead into a significant rural business. They highlighted the challenges of maintaining year-round occupancy and explained that the proposed spa facilities were essential to improving off-season demand, extending guest stays, and supporting local employment. The applicant noted that Planning, Environmental Health, Gloucestershire Highways, and Conservation Officers had all recommended approval, and that the scheme would sustain the business's long-term viability and contribution to the local economy.

Speaker 5 – Ward Member – Councillor David Fowles
The Ward Member noted that 50 residents, approximately 40% of the village, had objected, while 36 letters of support had also been submitted. They highlighted the significant contribution of Thyme to the local economy, employing over 138 people and providing wider community benefits, and recognised the sensitive restoration of existing buildings over the past 18 years. The Ward Member expressed concern that the application involved new buildings in open countryside, which could result in overdevelopment, harm to the Cotswold landscape, adverse impacts on heritage and listed buildings, noise, light, and highways issues, and the creation of a "village within a village."

Member Site Inspection Briefing Feedback

- The landscape was flat with gentle slopes, the existing buildings were clearly visible with their age and use apparent, and the public footpaths were well used. They described the proposal as a finely balanced scheme.
- The site was viewed from various public footpaths, as well as in relation to the church and nearby listed buildings. The Dovecote itself was not entered.
- The lanes through the village were driven to assess the site context.
- The model showing building heights and the CGI model aided visualising the development's impact. It was commented that it was unfortunate that light pollution could not be assessed due to the time of day.

16:50 Councillor Ray Brassington left the meeting
Councillor David Fowles raised concerns about the number of Members on the Planning and Licensing committee. The Chair explained that the Committee was quorate.

Member Questions
Members asked questions of the officers, who responded in the following way:

- The closest building to the boundary was single-storey, with a one-and-a-half-storey building set further back. There were no windows on the western elevations of the hotel bedroom or yoga studio with limited windows or doors on the spa building. Therefore, there would be no unacceptable overlooking from these buildings.
- The Flood Risk Management Officer requested additional information on drainage. The agents had agreed to the pre-commencement condition requested.
- Some lighting would be visible in the evenings, primarily from the lightweight link between the two stone buildings, but this was not considered out of character with the setting or the Conservation Area.
- Whilst the development would change the site, this would not necessitate harm to the significance of the listed buildings or the soft-edge character of the settlement. The proposed buildings were designed with small-scale, broken

massing in an agricultural style and the setting of the barn had already been altered by existing domestic features.

- The height of the existing boundary wall would not have affected the officer assessment or recommendation with regard to impact on heritage assets.
- Biodiverse green roofs were proposed on the more contemporary buildings to create a visual contrast with the traditional pitched-roof buildings. These roofs were intended as meadow grass roofs rather than sedum coverage.
- While permitted development rights could allow for the landing and taking off of helicopters, in the officer's view, the addition of three extra bedrooms would not materially intensify helicopter activity.

Member Comments

- The site was already visually cluttered and confusing, noting that some existing buildings might not receive permission if assessed today.
- Concern was raised about the single-storey residential building whose garden faced the field, with features appearing overly urban and out of keeping with the countryside setting.
- From public viewpoints, including footpaths, the application site was clearly visible, reinforcing the importance of how boundaries were treated.
- The economic benefit of the proposal carried greater weight than was typically the case when assessing impacts on listed buildings and their settings.

Councillor Ian Watson proposed and Councillor Michael Vann seconded the proposal to permit the application. The proposal was put to the vote and agreed by the Committee.
RESOLVED: To PERMIT the application.

25/02175/FUL Thyme - Southrop Estate Office - PERMIT (Resolution)		
For	Patrick Coleman, Daryl Corps, Dilys Neill, Michael Vann and Ian Watson	5
Against	David Fowles	1
Conflict Of Interests	None	0
Abstain	Julia Judd	1
Carried		

234 25/02722/LBC Thyme - Southrop Estate Office

The proposal was for the erection of glazed extension to curtilage listed building at Thyme.

Case Officer: Amy Hill
Ward Member: Councillor David Fowles

Officer Recommendation: PERMIT

The Chair invited the Case Officer to introduce the application. The Case Officer shared the Site Location Map, aerial photographs and photographs from different directions.

Member Comments:

- Clarity was sought regarding the meaning of curtilage listing within the context of this application. Officers explained that Southrop Lodge was the principal listed building. Stable Cottage was curtilage-listed, with its significance and protection deriving from its historic association with the Lodge. It was stated that when there was an ancillary structure that has been within the curtilage of a listed building since at least 1948 then it was treated as if it was a part of the primary building.

Councillor Michael Vann proposed and Councillor Ian Watson seconded the proposal to permit the application. The proposal was put to the vote and agreed by the Committee.

RESOLVED: To PERMIT the application.

25/02722/LBC Thyme - Southrop Estate Office - PERMIT (Resolution)		
For	Patrick Coleman, Dilys Neill, Michael Vann and Ian Watson	4
Against	Julia Judd	1
Conflict Of Interests	None	0
Abstain	Daryl Corps and David Fowles	2
Carried		

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235 24/02513/FUL Siddington Park

Development of land and erection of buildings to expand an existing Integrated Retirement Community (Use Class C2).

Case Officer: Andrew Moody
Ward Member: Councillor Mike Evemy
Officer recommendation: PERMIT SUBJECT TO THE COMPLETION OF A SECTION 106 LEGAL AGREEMENT.

The Chair invited the Case Officer to introduce the application who made the following points:

- The Tree Officer's condition had already been included in the agenda but had been omitted from the consultee list in error.

- Revised comments from the Parish Council had been received which raised an objection to the proposal.
- Site location plan, proposed site block plan, aerial photograph, proposed landscaping, elevations, shadow diagrams and photographs in around the site were shared.

Public Speakers

Speaker 1 – John Vale - Objector

The Objector claimed that the scheme was flawed, with officer assessments considered unreliable. They noted that the Council's Conservation Officer had unresolved concerns and that local residents and the ward councillor objected. The proposed development was described as overdevelopment, causing overlooking and harm to residential amenity. The Shadow Study was criticised for failing to account for the loss of mature boundary trees and reduced privacy. Phase 2 building heights and massing were not seen as responsive to site levels or the surrounding low-rise homes.

Speaker 2 – Rob Henderson – Agent

The agent stated that the applicant had worked closely with officers, particularly the Conservation Officer, to refine the design over time. Revisions addressed impacts on neighbouring homes, avoided overlooking and exceeded separation standards. The Care Village required a certain density to function, which was carefully balanced with its setting. Most concerns raised had been resolved, parking was acceptable, biodiversity gains were high, and the scheme had been presented as a successful and appropriate extension of the existing village.

17:34 – Councillor Ray Brassington returned to the Chamber but did not vote on the application.

Speaker 3 – Councillor Mike Evemy – Ward Member

The Ward Member identified the concerns of the size, scale and impact of the development whilst acknowledging the community value of providing 55 dwellings for older people and accepting that demand had been demonstrated. They expressed disappointment that the scheme contained no affordable housing and would be entirely market-led. The Ward Member concluded that the decision rested on whether 55 market units in six blocks, including one four-storey block, was too large and too close to neighbouring properties at Preston Lye with the potential loss of mature boundary trees. They urged the Committee to give careful consideration to whether the proposal was overly intensive and harmful to neighbouring amenity.

Member Questions:

Members asked questions of the officers, who responded in the following way:

- The site was within a sensitive area identified in the Preston Neighbourhood Plan as Area 6, where recent development had altered the historic agricultural

setting. The only area specifically referred to in the Neighbourhood Plan was to the North-West of Preston Bridge, adjoining the Tesco car park.

- The site had originally been allocated for employment use in the 2006 local plan but had not been brought forward, resulting in a C2 residential use being established through a 2011 outline permission.
- Adopted local plan policies and the Gloucestershire Local Housing Needs Assessment identified a significant and increasing need for sheltered, extra care and nursing accommodation.
- An independent assessment by external consultants and the Council Strategic Housing team, having reviewed both the viability appraisal and the consultants' advice, was satisfied that affordable housing could not be required in this case.
- The development included a total of 109 bedrooms and provided 68 parking spaces.
- Part of the legal agreement, which was still pending completion, included a travel plan to promote sustainable transport and facilitate residents' travel. Similar travel schemes were already in place for Phase One residents.
- An additional condition could be added to specify the use of air source heat pumps or solar panels.
- Conditions could be amended to apply from the first occupation of any units, and references to NPPF paragraphs could specifically cite paragraphs 135(f) and 198.

Member Comments:

Members proposed the following reasons to arrange a Site Inspection Briefing:

- To assess the impact of the proposal on neighbouring properties.
- To consider the effects on existing trees, including identifying which trees would be lost.
- To evaluate the massing and siting of the new buildings in the context of Preston Leigh.

Councillor Patrick Coleman proposed an All-Member Site Inspection Briefing and Councillor David Fowles seconded the proposal. The proposal was put to the vote and agreed by the Committee.

RESOLVED: To DEFER the application in favour of a Site Inspection Briefing.

24/02513/FUL Siddington Park - DEFER pending SIB (Resolution)		
For	Patrick Coleman, Daryl Corps, David Fowles, Julia Judd, Dilys Neill, Michael Vann and Ian Watson	7
Against	None	0
Conflict Of Interests	None	0
Abstain	None	0
Carried		

236 Licensing Sub-Committee

There were no licensing sub-committees planned.

Subsequently, a Licensing Committee meeting was called for 12 February 11am.

237 Sites Inspection Briefing

The Chair advised all Members to keep 4 February 2026 free for a Site Inspection Briefing.

The Meeting commenced at 2.00 pm and closed at 5.56 pm

Chair

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PLANNING AND LICENSING COMMITTEE
11 February 2026

SCHEDULE OF APPLICATIONS FOR CONSIDERATION AND DECISION (HP)

- **Members are asked to determine the applications in this Schedule. My recommendations are given at the end of each report. Members should get in touch with the case officer if they wish to have any further information on any applications.**

- **Applications have been considered in the light of national planning policy guidance, the Development Plan and any relevant non-statutory supplementary planning guidance.**

- The following legislation is of particular importance in the consideration and determination of the applications contained in this Schedule:

  - **Planning Permission:** Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that "where in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material consideration indicates otherwise. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 - special regard to the desirability of preserving the (listed) building or its setting or any features of special architectural or historic interest.

  - **Listed Building Consent:** Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 - special regard to the desirability of preserving the (listed) building or its setting or any features of special architectural or historic interest.

  - **Display of Advertisements:** Town and Country Planning (Control of Advertisements) (England) Regulations 2007 - powers to be exercised only in the interests of amenity, including any feature of historic, architectural, cultural or similar interest and public safety.

- The reference to **Key Policy Background** in the reports is intended only to highlight the policies most relevant to each case. Other policies, or other material circumstances, may also apply and could lead to a different decision being made to that recommended by the Officer.

- Any responses to consultations received after this report had been printed, will be reported at the meeting, either in the form of lists of **Additional Representations**, or orally. Late information might result in a change in my recommendation.

- The **Background Papers** referred to in compiling these reports are: the application form; the accompanying certificates and plans and any other information provided by the applicant/agent; responses from bodies or persons consulted on the application; other representations supporting or objecting to the application.

PLANNING AND LICENSING COMMITTEE 11 February 2026
INDEX TO APPLICATIONS FOR CONSIDERATION AND DECISION

Parish	Application	Schedule Order No.
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Preston	Siddington Park Cirencester Road Gloucestershire GL7 6GU 24/02513/FUL Full Application	3

Outline application for the erection of up to 30 dwellings with associated means of access, car parking, public open space, landscaping, sustainable drainage system (SuDS) and associated infrastructure (all matters reserved except for access) at Land North of Folly View Broadway Road Willersey Gloucestershire

Outline Application 25/02983/OUT	
Applicant:	Eagle One Homes
Agent:	Origin3
Case Officer:	Martin Perks
Ward Member(s):	Councillor Gina Blomefield and Councillor Tom Stowe
Committee Date:	11 February 2026
RECOMMENDATION:	**PERMIT subject to completion of S106 legal agreement(s) covering financial contributions to secondary education, library services and community transport, the provision of affordable housing and self-build/custom build housing, and financial contributions to Willersey Parish Council for improvements to the village hall, recreation ground and cemetery**

1. Main Issues:

(a) Residential Development Outside a Principal or Non-Principal Settlement
(b) Housing Mix and Affordable Housing
(c) Impact on the Cotswolds National Landscape
(d) Access and Highway Safety
(e) Flooding and Drainage
(f) Impact on Residential Amenity
(g) Biodiversity

2. Reasons for Referral:

2.1 This application has been referred to Planning and Licensing Committee as it falls into the major development category as set out in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

3. Site Description:

3.1 This application relates primarily to the southern part of an agricultural field lying adjacent to the western edge of the village of Willersey. The application

site measures approximately 1.84 hectares in area. The field as a whole measures approximately 3.1 hectares in size. The existing field is flat in appearance and is set to grass. Agricultural fields are located to the west of the application site and to its immediate north. A group of agricultural type buildings, which are now used for commercial purposes, are located approximately 80m to the north-west of the application site. Post war residential development adjoins the southern and eastern boundaries of the application site. In addition to the application field, the application site also includes the route of a proposed access drive which would extend approximately 50m into the Folly View housing development to the south of the aforementioned field.

3.2 The village of Willersey is designated as a Principal Settlement in the Cotswold District Local Plan 2011-2031. The village's development boundary extends along the southern and eastern boundaries of the application site. The application site is located outside, but adjacent to, the village's development boundary.

3.3 The site is located within the Cotswolds National Landscape (CNL) (formerly known as the Cotswolds Area of Outstanding Natural Beauty). The boundary of the CNL extends along the southern side of Collin Lane approximately 250m to the north of the application site.

3.4 The site is located outside of Willersey Conservation Area. The boundary of the conservation area is located approximately 180m to the east of the application site. There are no listed buildings within the immediate vicinity of the application site.

3.5 Public Right of Way HWY9 runs along the eastern and northern boundaries of the part of the field lying to the north of the application site.

3.6 The site is located within Flood Zone 1.

4. Relevant Planning History:

Application site

4.1 None

Land to north of application site

4.2 14/04854/OUT Residential development for up to 71 dwellings (35 to be affordable units). Refused 2015. Dismissed at appeal 2016 (APP/F1610/W/15/3121622)

Land to south of application site - site of Folly View

4.3 CD.2043 Outline application for the erection of a bungalow Refused 1957

4.4 CD.2043/A Outline application for the erection of 2 bungalows Refused 1960

4.5 CD.2043/B Outline application for house and bungalow Refused 1964 Dismissed at appeal 1965

4.6 CD.2043/E Fruit and vegetable stall on roadside Refused 1969

4.7 CD.2043/F Outline application for a semi-bungalow Appeal dismissed 1974

4.8 CD.2043/G Outline application for erection of a farmhouse Refused 1978

4.9 CD.2043/H Erection of a steel portal framed agricultural building Refused 1977

4.10 CD.2043/G Outline application to erect a dwelling Refused 1988

4.11 CD.2043/J Erection of a new building for storage and sale of goods produced in adjoining glasshouse, new vehicular access Refused 1980 Appeal dismissed 1981

4.12 CD.2043/K Erection of a dwelling and garage Refused 1984 Appeal dismissed 1985

4.13 14/01739/OUT Residential development of up to 20 dwellings (Outline application). Recommended for approval by Officers. Refused by Planning Committee 2014. Allowed at appeal 2015 (APP/F1610/A/14/2227938).

4.14 16/01572/FUL Erection of 30 no. dwellings with access, landscaping and associated infrastructure. Permitted 2016

4.15 16/04902/FUL Variation of Condition 2 (plan numbers) of permission 16/01572/FUL (Erection of 30 no. dwellings with access, landscaping and associated infrastructure) involving amendments to design and layout of approved scheme. Permitted 2017

Land to south of application site - Field House

4.16 23/00366/OUT Outline application for erection of up to 4 dwellings and garages with associated landscaping, parking and works Demolition of existing commercial and domestic buildings. Permitted 2023

4.17 23/03814/FUL Demolition of existing commercial and domestic buildings and construction of 5 dwellings and associated infrastructure. Permitted 2024

4.18 24/01262/FUL Demolition of existing commercial and domestic buildings and construction of 5 dwellings and associated infrastructure. Variation of condition 2 (approved plans) of planning permission 23/03814/FUL to enable amendments to design of approved scheme. Permitted 2024

5. Planning Policies:

- INF8 Water Management Infrastructure
- DS1 Development Strategy
- DS4 Open Market Housing o/s Principal/non-Pr
- H1 Housing Mix & Tenure to meet local needs
- H2 Affordable Housing
- EN1 Built, Natural & Historic Environment
- EN2 Design of Built & Natural Environment
- EN4 The Wider Natural & Historic Landscape
- EN5 Cotswolds AONB
- EN7 Trees, Hedgerows & Woodlands
- EN8 Bio & Geo: Features Habitats & Species
- EN14 Managing Flood Risk
- EN15 Pollution & Contaminated Land
- INF1 Infrastructure Delivery
- INF3 Sustainable Transport
- INF4 Highway Safety
- INF5 Parking Provision
- INF7 Green Infrastructure

6. Observations of Consultees:

6.1 Gloucestershire County Council Highways: No objection subject to conditions.

6.2 Gloucestershire County Council Lead Local Flood Authority: Additional information requested.

6.3 Gloucestershire County Council Archaeology: No objection subject to condition.

6.4 Gloucestershire County Council Community Infrastructure: Requests contribution of £39,771.20 to secondary)16-18 education and £5,880 to library services. A contribution of £50,000 to community transport is also requested.

6.5 Gloucestershire County Council Public Rights of Way:

6.5.1 *'The proposed development lies in close proximity to Public Right of Way (PROW) HWY9, which has been clearly identified and thoughtfully considered within the Design and Access Statement. I appreciate that the development has been set back from the PROW, which helps preserve the character of the area and aligns well with the existing built environment at the eastern end of HWY9. I'm pleased to see the inclusion of a linking path between the northern edge of the village/main street and the existing footpath. It would be highly beneficial if this new path could be legally dedicated as an extension of HWY9, securing permanent connectivity for pedestrians.*

6.5.2 While this path would provide direct access to village amenities and the wider countryside, it's important to note that it is classified as a footpath, not a bridleway. Therefore, the aspiration for a cycling link, as mentioned in Section 4.1 of the Design Response, is unfortunately not feasible under its current legal status along this route.

6.5.3 I would like to seek clarification regarding the statement in Part 11 of the Design and Access Statement, which reads: "Plots 1, 2 and 3 will properly address open space and the PROW beyond." This wording is vague and somewhat ambiguous, particularly as plots 1, 2, and 3 are not located near the Public Right of Way—plot 17 appears to be the closest. Could you please clarify what is meant by this statement and how these plots are intended to relate to the PROW?

6.5.4 The legal routes of the existing footpaths must be protected and remain fully available for public use at all times. If the footpaths need to be temporarily closed to allow ground works to take place or to safeguard the public during construction works, then an application should be made to GCC PROW giving 12 weeks' notice for this.'

6.6 Biodiversity Officer: No objection subject to conditions.

6.7 Tree Officer: No objection subject to condition.

6.8 Environmental and Regulatory Services Air Quality: No objection.

6.9 Environmental and Regulatory Services Contamination: No object subject to condition.

6.10 Housing Officer: Comments incorporated into report.

6.11 Landscape Consultant: Comments incorporated into report.

6.12 Severn Trent Water: No objection subject to condition.

6.13 Thames Water: No objection. Recommend attachment of water supply condition. Comments incorporated into report.

6.14 Historic England: *' Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application.'*

6.15 NHS Gloucestershire: No response to date.

6.16 Worcestershire County Council: No response to date.

6.17 Wychavon District Council: No response to date.

7. View of Parish Council:

Response received on the 6th November 2025:

7.1 *' Willersey Parish Council objects to planning application 25/02983/OUT.*

7.1.1 The proposal is contrary to multiple provisions of the National Planning Policy Framework (December 2024), including:

- *Paragraphs 8 and 11-15 - the plan-led and sustainable development principles;*
- *Paragraph 79 - ensuring rural housing maintains the vitality of existing communities;*
- *Paragraphs 104-110 and 105 - promoting sustainable transport and protecting public rights of way;*
- *Paragraphs 167-169 - managing flood risk and ensuring drainage infrastructure is adequate; and*
- *Paragraphs 174-183 (especially 182) - giving great weight to conserving and enhancing the landscape and scenic beauty of Areas of Outstanding Natural Beauty.*

7.1.2 It also conflicts with the Cotswold District Local Plan (2011-2031), notably Policies DS1, DS2, EN1, EN4, EN5, EN14, EN15, INF1, INF3, INF5, INF7, and S19, and with the Cotswolds AONB Landscape Strategy and Guidelines (Section 19.1 - Escarpment Outliers).

7.1.3 Furthermore, the proposal fails to comply with DEFRA's Rights of Way Circular 1/09, which requires planning authorities to treat the effect of development on public rights of way as a material consideration (see Chapter 7).

7.2 *Housing Land Supply and Policy Context*

7.2.1 Willersey Parish Council recognises that the Cotswold District Local Plan (2011-2031) is now partially out of date, as the District cannot currently demonstrate a five-year housing land supply in accordance with the NPPF.

7.2.2 However, under NPPF paragraph 11(d) and Footnote 8, the "tilted balance" in favour of granting permission does not apply where policies protecting areas of particular importance are relevant — including the Cotswolds Area of Outstanding Natural Beauty (AONB).

7.2.3 The AONB designation therefore provides a clear reason for refusal, regardless of the current housing supply position.

7.2.4 Furthermore, the PC has been consulting with developers on applications for 60 homes at W7A which is in the Local Plan and also for 40 on W4B which is outside the AONB and more likely to gain approval. If W4B is granted then W11 will likely be added. We suggest that the final applications for these 2 sites will be in the region of 100 homes. Thus additional development on W8B will far exceed the numbers envisaged in the Local Plan and would be disproportionate to the size, character, and infrastructure capacity of the village, contrary to the plan-led approach required by NPPF paragraphs 11, 15, and 20.

7.3 *Harm to the Cotswolds AONB*

7.3.1 The site lies within the Cotswolds Area of Outstanding Natural Beauty (AONB), a nationally protected landscape where great weight must be given to conserving and enhancing scenic beauty (NPPF paragraphs 182-183 and Section 85 of the Countryside and Rights of Way Act 2000).

7.3.2 The Cotswolds AONB Landscape Strategy and Guidelines (Section 19.1 - Unwooded Vale) identifies this landscape as one of the most visually sensitive

parts of the Cotswolds. This development would contravene a number of guidelines:

- *Maintain the open, sparsely settled character of the Unwooded Vale by limiting new development to existing settlements and avoiding development between existing villages.*
- *Avoiding development that will intrude negatively into the landscape and cannot be successfully mitigated, for example, extensions to settlements in areas of open landscape.*

7.3.3 The advice is to maintain open, undeveloped gaps between settlements, to prevent coalescence and retain distinct village identities - this proposal would reduce the gap against the guidance and link the village to the houses on the other side of the County boundary in Broadway. It would significantly reduce the space between Folly View and the Willersey Provisions industrial site off Collin Lane turning open countryside with isolated developments into built up area surrounding the remains of W8A green space. This is gradual erosion of the AONB at its border.

- *Ensure that new development does not adversely affect the wider rural landscape and views to and from the AONB. This proposal would degrade the panoramic views to and from the escarpment and across the vale- especially from FP 9 and others on the escarpment e.g. FPs 10,12 &14.*
- *Conserve the existing dark skies and areas of dark landscape*

7.3.4 Adopt measures to minimise and where possible reduce light pollution

7.3.5 Any development would be contrary to these guidelines - see para 6.

7.3.6 This proposal would directly conflict with these strategic objectives. It would introduce suburban-style development into open countryside, reduce the green gap between Willersey and Broadway, and erode key view corridors towards the escarpment. The result would be a permanent and harmful alteration to the open landscape character of this part of the AONB.

7.4 *Impact on Public Right of Way FP9*

7.4.1 A much-used Public Footpath (FP9) runs from the edge of the Field Lane housing along open fields with minimally uninterrupted views across the countryside to the Cotswold escarpment. This important public amenity would be severely compromised, as the outlook would change from open rural views

to a housing estate. The estate would be located at the very point that the FP enters what is currently open fields.

7.4.2 This conflicts with Local Plan Policy INF7 (Green Infrastructure), which requires development to protect and enhance existing green infrastructure and access networks.

7.4.3 NPPF paragraph 105 reinforces that "Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users." This proposal has the opposite effect.

7.4.4 Chapter 7 of DEFRA's Rights of Way Circular 1/09 also states:

"The effect of development on a public right of way is a material consideration in the determination of applications for planning permission, and local planning authorities should ensure that the potential consequences are taken into account whenever such applications are considered."

7.4.5 This development would have a clear negative impact on FP9 and on public enjoyment of the AONB landscape.

7.5 *Flooding, Drainage, Water and Sewage Infrastructure*

7.5.1 The site is frequently waterlogged, and Willersey's sewage system already overflows during heavy rainfall; it overflows in Collin Lane into the stream there. This is a pinchpoint for all flows from the west of the village. Since the system is already overflowing on occasion, the additional flow from this development would go straight into the stream and gardens of residents on Collin Lane. The pumping station also overflows as it cannot cope with the existing volumes. The PC will submit a separate comment on this issue.

7.5.2 This conflicts with Local Plan Policies EN14 (Managing Flood Risk), EN15 (Pollution and Contaminated Land), and INF5 (Sustainable Drainage Systems), as well as NPPF paragraphs 167-169.

7.5.3 If the application were approved we ask that a condition be attached that no dwellings should be occupied until adequate foul drainage and sewage upgrades are completed and operational, verified by Severn Trent Water and the Lead Local Flood Authority.

Fresh Water.

7.5.4 We note Thames Water comment: Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal.

7.5.5 We submit that approval would be contrary to CC6 in the Plan update consultation and also LP INF1 & INF2 also NPPF para 20 & 161.

7.6 *Sustainability and Access*

7.6.1 Willersey has very limited local facilities— a garage, primary school and two public houses. Willersey was designated as a Principal Settlement in the last LP but due to the closure of both the Post Office and village shop has been reclassified in the ongoing Reg.18 consultation as Non Principal.

7.6.2 Residents must travel to Broadway or beyond for shops, secondary schools, and medical services. The pavement to Broadway is frequently under water, making pedestrian access unsafe and unsustainable. This somewhat isolated location on the edge of the village encourages a pattern of car-dependent living which conflicts with NPPF paragraphs 8 and 104-110 and Local Plan Policies DS1, DS2, and INF3 (Sustainable Transport).

7.7 *Impact on the Cotswolds AONB Dark Skies*

7.7.1 The Cotswolds AONB is recognised as having some of the darkest skies in England, ranked 13th out of 326 districts nationally. Darkness at night is identified as one of the "special qualities" of the AONB in the Cotswolds AONB Management Plan (2018-2023).

7.7.2 The AONB's Position Statement on Dark Skies and Artificial Light (March 2019) sets out Policy CE5: Dark Skies, which states that:

"Development proposals in the Cotswolds AONB should avoid and minimise light pollution affecting dark skies and should seek opportunities to remove or reduce existing sources of light pollution."

7.7.3 The policy also seeks to increase the area of dark skies by controlling the spread of artificial lighting and protecting the tranquillity and night-time character of the AONB.

7.7.4 This development would introduce significant new sources of light pollution — including street lighting, domestic security lighting, and vehicle headlights — at the rural edge of Willersey, within one of the darker parts of the Cotswold escarpment landscape.

7.7.5 The cumulative effect would erode the rural night-time environment, diminish enjoyment of the night sky, and conflict with Policy CE5 of the Cotswolds AONB Position Statement. It would also be inconsistent with NPPF paragraphs 174 and 182, which require great weight to be given to conserving and enhancing the landscape and scenic beauty of the AONB, including its dark skies.

7.7.6 The applicant has not provided any detailed lighting strategy or assessment of light spill, nor any measures to mitigate potential harm. The proposal therefore conflicts with Policy CE5 of the Cotswolds AONB Dark Skies Statement and Local Plan Policies EN1 and EN4, which require that development respects and enhances the natural and scenic qualities of the AONB.

7.8 *Cumulative Impact and "Major Development" Status*

7.8.1 The developer previously consulted local residents on a larger scheme of 50 houses over a greater area.

7.8.2 This partial application for 30 homes represents a strategic attempt to circumvent planning policy thresholds contrary to NPPF Paragraphs 55-57 & 64 and LP Policies INF1, DS1 & S2. Although related to Cirencester, S2 supports the principle that the site should be assessed as a whole.

7.8.3 We suggest CDC require a masterplan or phasing strategy for the full site before determining any part of the application

7.8.4 The current application for 30 houses does not materially reduce the landscape, visual, or infrastructure impacts of the development of this site.

7.8.5 A "major development" is defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015 as:

- *Housing: 10 or more dwellings, or sites of 0.5 hectares or more;*

7.8.6 This proposal clearly qualifies as major development, and under NPPF paragraph 182 and Local Plan Policy EN1, major development in an AONB

should only be permitted in exceptional circumstances and where it is in the public interest.

7.8.7 The applicant's assertion that this scheme is "not major" is therefore misleading. The proposal has significant cumulative impacts on landscape, FP9, drainage, dark skies, and village sustainability, and must be treated as major development requiring full scrutiny.

7.8.8 The village has other sites outside the AONB and development which erodes the AONB is not in the public interest.

7.9 *Conclusion*

7.9.1 This proposal would:

- *Cause substantial harm to the Cotswolds AONB;*
- *Destroy valued views and reduce amenity along Public Footpaths*
- *Fail to protect or enhance green infrastructure, contrary to INF7 and NPPF para 105*
- *Exacerbate flooding and sewage issues; and*
- *Represent unsustainable, disproportionate growth beyond the capacity of the village.*

7.9.2 Should permission nevertheless be granted we recommend that conditions be attached:

- *no dwellings should be occupied until water and sewage systems are fully upgraded,*
- *a substantial landscape buffer must be provided to protect the AONB and the amenity of Public Footpath FP9.*
- *The existing 30mph limit be extended to include the entrance to Folly View.'*

8. Response received on the 14th November 2025:

8.1 *' This is one of two current planning intentions for a total of ninety houses in Willersey and we are expecting another application for thirty shortly.*

8.1.1 Although we realise that each planning application is considered separately, we would ask that CDC consider the impact of cumulative approvals for build on the village. We would also like to engage with the Council regarding

the proposed Local Plan and understand that current planning applications will not be considered as part of the future proposed allocation.

8.1.2 Willersey Parish Council requests CDC to pause any further planning decisions whilst the Consultation on the Local Plan takes place, so local people and their representatives can discuss future development with CDC and make strategic, rather than damaging piecemeal decisions.

8.1.3 Willersey Parish Council formally objects in the strongest possible terms to planning application 25/02983/OUT. This proposal for 30 new dwellings is fundamentally flawed, demonstrably unsustainable, and directly contravenes key principles established in the National Planning Policy Framework (NPPF 2024) and the Cotswold District Local Plan (CDLP).

8.1.4 The proposed development, when considered alongside recent and pending growth in Willersey and neighbouring settlements, will lead to an intolerable and critical strain on the village's already failing infrastructure and irreversible environmental harm.

1. <u>Failure to Address Infrastructure Incapacity and Crisis Points</u>

1.1 The proposal fails to satisfy the requirements of NPPF Paragraphs 98 and 101 (ensuring development is only granted where the necessary infrastructure is available or can be provided) and CDLP Policy INF1 (Supporting Infrastructure). Willersey's essential services are at crisis point and cannot absorb the impact of a further 30 households.

1.1 <u>Foul Sewerage, Drainage, and Flood Risk (NPPF 170 & CDLP EN14)</u>

1.1.1 The foul sewerage and drainage system is severely overburdened. The existing infrastructure has already been significantly impacted by the cumulative strain from the Folly View, Willow Green, and Farncombe Estate developments joining the network.

1.1.2 The system, which operates as a single pipe system, is at maximum capacity, resulting in frequent and severe sewage spills. Flooding has become a regular occurrence, sometimes up to five times a year, especially during prolonged heavy rain. This affects Collin Lane, Blind Lane, and Badsey Road (under the railway bridge). Crucially, raw sewage, which has been seen floating along Collin Lane and into the stream alongside the Recreation Ground/Willow Green (ultimately feeding into Badsey Brook and the River Avon), is being discharged into floodwaters and the gardens of Collin Lane, posing a severe

public health risk. This contamination causes the backup of sewage systems for properties on Collin Lane, Collin Close, and others, stopping the use of toilets and showers until the floodwaters subside.

1.1.3 Holding Objection from Severn Trent: The Parish Council notes that Severn Trent (the foul sewerage provider) has requested a Holding Objection to this planning application, having been alerted to the potential for the proposed development to have a detrimental impact on the surrounding Network and Treatment Works, with the possibility of causing further flooding or pollution. The Parish Council requests that Severn Trent's recommendations, following their investigation, are given maximum weight, noting that simply stating Severn Trent has a duty to improve the network deflects responsibility and conflicts with recommendations from the National Flood Forum (NFF).

1.2 Water Supply Network Capacity (CDLP INF1)

1.2.1 In addition to the foul drainage issues, the existing water supply network has been officially determined to be insufficient to serve this development, directly contradicting the requirement for necessary infrastructure to be in place. This deficiency is officially noted:

1.2.2 Thames Water Comments: Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. As such Thames Water request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed... (etc.)

1.2.3 This official statement confirms that the necessary water network infrastructure is not currently available, placing an unacceptable risk of no/low water pressure on existing residents and directly contravening planning policy.

1.3 Health and Education Services

1.3.1 Local GP surgeries and dental practices, particularly those in the wider catchment area including Broadway (which is situated in the adjacent county of Worcestershire and on which Willersey villagers rely for service provision), are already severely overstretched. Waiting times are increasing, a situation worsened by developments impacting the already strained Worcestershire service provision. Furthermore, the village school is small and its site in the conservation area constrains expansion, with most year groups at capacity. An

influx of new residents, particularly families, will exacerbate this crisis, forcing households to make multiple daily journeys to separate primary schools or seek education further afield, thereby undermining the sustainability of the location. CIL Inadequacy: The Parish Council firmly maintains that these critical infrastructure challenges—including but not limited to Sewage, Fresh Water, Electricity, Gas, GPs, and Schools—will not be addressed by the Community Infrastructure Levy (CIL) suggested by the developer. These essential infrastructure challenges must be definitively resolved before any planning permission could be granted.

2. Irreversible Harm to the Cotswolds National Landscape (AONB)

2.1. The application site lies within the Cotswolds National Landscape (AONB), a nationally protected landscape where great weight must be given to conserving and enhancing scenic beauty (NPPF Paragraphs 187-190 and Section 85 of the Countryside and Rights of Way Act 2000). In such locations, the scale and extent of development should be limited, and the 'presumption in favour of sustainable development' does not automatically apply (NPPF Paragraph 11). The destruction of AONBs contravenes the 1949 Act of Parliament passed to conserve such areas of the UK.

2.2 Development here must adhere to the highest level of protection, as stipulated by NPPF Paragraphs 189 and 190 (giving great weight to landscape and scenic beauty) and CDLP Policy EN5 (Conserving AONB).

2.1 Major Development and Strategic Circumvention (NPPF 182, 55-57, 64 & CDLP EN1, S2, INF1, DS1)

2.1.1 This proposal for 30 dwellings clearly qualifies as major development within an AONB, and under NPPF Annex 2 Glossary and Local Plan Policy EN1, it should only be permitted in exceptional circumstances and where it is in the public interest—a test this application fails entirely.

2.1.2 Furthermore, this proposal is understood to represent a second phase of development (following Folly View) based on an option to purchase acquired during the first phase. This partial application for 30 homes represents a strategic attempt to circumvent planning policy thresholds by seeking piecemeal consent, contrary to NPPF Paragraphs 55-57 & 64 and Local Plan Policies INF1, DS1, & S2 (which supports assessing the site as a whole). The Parish Council strongly recommends that Cotswold District Council require a masterplan or phasing strategy for the full site before determining any part of the application.

2.2 Coalescence, Visual Harm, and Dark Skies

2.2.1 The Cotswolds AONB Landscape Strategy and Guidelines (Section 19.1 - Unwooded Vale) identifies this area as one of the most visually sensitive parts of the Cotswolds. This development contravenes core guidelines by failing to:

- *Maintain the open, sparsely settled character of the Unwooded Vale by extending the settlement into an open landscape.*

- *Maintain open, undeveloped gaps between settlements to prevent coalescence and retain distinct village identities. This proposal continues to reduce the gap and will link the village to houses across the County boundary in Broadway, significantly reducing the space between Folly View and the Willersey Provisions industrial site. This constitutes a gradual, irreversible erosion of the AONB at its border.*

2.2.2 Ryan Mills, Landscape Consultant, states in his report:

2.2.3 "The site occupies a sensitive position on the western edge of Willersey, forming part of the rural setting of the village within the Cotswolds National Landscape. The proposed development would give rise to localised adverse effects on landscape character and visual amenity, particularly in views from Willersey Footpath 9 and from nearby residential receptors."

2.2.4 The site is highly visible, severely interrupting panoramic views of the escarpment, particularly from the public footpath Willersey 9 and others on the escarpment (e.g., FPs 10, 12, & 14). Granting permission would cause irreversible visual harm and degrade the panoramic views to and from the escarpment and across the vale.

2.2.5 Furthermore, the proposal completely ignores the requirement to minimise light pollution and conserve existing dark skies. The development contravenes AONB guidelines, and the AONB's Position Statement on Dark Skies and Artificial Light (March 2019) has not been considered by the applicant, threatening to erode the area's dark skies and setting a damaging precedent.

2.3 Ecological Damage (NPPF 189, 190 & NERC Act S41)

2.3.1 The Parish Council asserts that the proposal completely ignores the conservation and enhancement of wildlife and cultural heritage, as required by NPPF Paragraphs 189 and 190. The site possesses important biodiversity,

including species listed as being of conservation concern on Section 41 of the NERC Act (Habitats and Species of Principal Importance). Documented sightings include RSPB Red List birds (e.g., lesser spotted woodpecker) and Amber List birds (e.g., tawny owl), which will lose their habitat if this field is developed.

2.3.2 The Parish Council therefore questions the accuracy of the Ecological Appraisal Report prepared by Malford Environmental Consulting Ltd, which, for example, states in Field Survey 4.6.2 that "very few birds were seen or heard." Local residents, including Mr. R. Topp (whose photographic evidence is published in the Parish magazine), have consistently reported a vast biodiverse area for many species of conservation concern that are increasingly rare across the UK. The site is an essential wildlife corridor used by deer, foxes, and rare newts, and must be protected.

3. <u>Loss of Village Identity and Unsustainable Location</u>

3.1 The proposal constitutes unsustainable development, threatening the small, rural character of Willersey and directly ignoring the principles of plan-led development required by NPPF Paragraph 15.

3.2 Lack of Amenities and Transport (NPPF 8, 104-110 & CDLP DS1, DS2, INF3): Willersey lacks the essential facilities to support this development. The village is now extremely limited, consisting only of two public houses, a garage (fuel only), and a primary school. Residents must travel to Broadway or beyond for access to shops, medical services, and schools.

3.3 This dependency on external services means residents are isolated and car-dependent, which conflicts directly with NPPF Paragraphs 8 and 104-110 and Local Plan Policies DS1, DS2, and INF3 (Sustainable Transport). The developers' proposed transport strategy is untenable: the pavement to Broadway (approx. 1.1 miles/25-minute walk to the nearest shop) is frequently underwater, making the journey unsafe and unsustainable, and the direct route involves crossing the A44 near a busy roundabout, which is dangerous. This isolation and inherent car dependency will equally apply to the residents of the new development.

3.4 Erosion of Character: This scheme is widely viewed by the community as a "continuous march towards urbanisation," threatening to turn this "quintessentially Cotswold Village" into an "urbanised satellite" that merges with Broadway. The development fundamentally changes the lifestyle bought into by existing residents, particularly those who purchased retirement homes

seeking quiet living, whose quality of life will be detrimentally affected by the proposed large, family-orientated estate and adjacent play area.

4. Planning Compliance and Community Engagement

4.1 Rebuttal of Applicant's Claims

4.1.1 The Parish Council challenges several key statements made by the Applicant (Eagle One) in their consultation materials and documentation:

- *Character of the Land: The developer describes the proposed site as "an agricultural field landscaped as an orchard." This is factually incorrect. The field is actively used as both arable and pastural land, used for grazing animals (cows and sheep) and to produce hay/grass bales, as evidenced by photographs submitted in other objections.*

- *Enclosure and Impact: The developer incorrectly states the site "is well enclosed and well-related to existing houses of Willersey, so is considered it would have minimal impact on the National Landscape." The Parish Council asserts the site is neither well enclosed nor well related. It is bound by hedgerows and a public right of way (HWY9). The development will have maximum impact on the National Landscape, causing irreversible visual harm highly visible from the escarpment and public footpaths, evident even from the photographs provided by the developer. It is highly likely that Broadway Tower will no longer be visible from this public footpath should development proceed.*

4.2 Unnecessary and Unplanned Development

4.2.1 The land is not designated for housing within the current Local Plan. The village has already accommodated in excess of 125 new properties spread across at least four sites in recent years. This level of growth is far in excess of the much revised local plan for the next decade and clearly constitutes over-development.

4.2.2 Furthermore, Willersey was designated as a Principal Settlement in the last Local Plan but, due to the closure of both the Post Office and village shop, it has been reclassified in the ongoing Regulation 18 consultation as Non-Principal. Therefore, basing the planning application on the technicality that Willersey is currently a Principal Settlement (based on an old local plan) is misleading and fails to account for how the area has changed and the true lack

of sustainability. This proposal is therefore overbearing and should be refused due to the existing and documented strain on infrastructure, as detailed above.

4.2.3 Housing Type and Community Benefit: There is significant scepticism regarding the true affordability of the proposed homes, citing previous local developments where "affordable" housing remained beyond the reach of local young people. Furthermore, the proposed amenity (a play area) is redundant given the existence of a thriving recreation ground, leading to the conclusion that the scheme offers NO valuable contribution to the village at all.

4.2.4 Procedural Failings (NPPF 15): This proposal ignores the community's clear vision for Willersey, where the developer's own consultation showed 97% of respondents opposed the plan, directly violating the spirit of plan-led and community involvement requirements.

5. <u>Conclusion and Request for Refusal</u>

5.1 For the reasons detailed above, this proposal fails to meet the tests of sustainability, infrastructure capacity, and environmental protection set out within the NPPF (2024) and the Cotswold District Local Plan. The documented inability of the existing water network, the crisis in health and education provision (especially considering reliance on Worcestershire services), the irreversible visual and ecological harm to the Cotswolds National Landscape, and the demonstrable lack of community support are overwhelming grounds for refusal.

5.2 Willersey Parish Council respectfully requests that Planning Application Ref: 25/02983/OUT be refused forthwith.'

8.2 In addition to the above comments, Willersey Parish Council has also submitted a separate request for financial contributions towards the following:

i) Village Hall extension & upgrades;
ii) Recreation Ground improvements;
iii) Cemetery improvements;

8. Other Representations:

8.1 Approximately 141 individual objections, 273 signed copies of a standard objection letter and 1 support received.

8.2 **Main grounds of objection are:**

i) Over development of our village which is already over developed.
ii) The development is within the AONB.

iii) The development is on prime agricultural land.
iv) There are no affordable houses planned within this application for the young people of our village to buy.
v) The majority of residents of Folly view do not want this development.
vi) There are three other developments in the pipe line for expansion of our village namely - a) Auto sleepers on the Willersey Industrial estate, b) 60 houses proposed by the C of E church on the field called Terrafy; c) 50 houses that Newlands want to build on the field once owned by Jean Moore at the rear of the new Willow Green development.
vii) The sewage presently in the village can't cope, Severn Trent are constantly being called to clear and jet blast through the existing sewer pipes at the bottom of Collin Close and in Collin Lane.
viii) Surface water adds to the problem when there is prolonged heavy rain with sewage spilling out of the storm drains onto the road in Collin Lane. This sewage has been seen floating down the road and into the stream feeding into Badsey brook which feeds into the river Avon. This is not healthy for both aquatic life and humans.
ix) There are no local convenience stores in Willersey.
x) The public transport is sparse and unconnected, so to go to an early doctor's appointment or catch or return by a train from Honeybourne or Evesham stations, if you haven't got a car or can't afford to pay for a taxi you are stuck.
xi) The five country roads feeding into Willersey are busy at peak times. In poor surface condition, very twisty which leads to several serious accidents due to reckless speeding drivers which will only increase with more people moving into the village having to commute for work.
xii) Doctor's surgeries are near to capacity.
xiii) Primary and secondary schools are also near to capacity.
xiv) In nearby Broadway (Controlled by Wychavon Planning) a 114 house development has been approved with more to come, we share some of their infrastructure which is also near to full capacity.
xv) The strip of land that this developer is applying for is in the AONB if granted it is likely there will be additional infill applications from developers to join up a string of ribbon plots connecting Broadway Road to Collin Lane all within the protected AONB.
xvi) There will be nothing to stop the applicant extending this to 50 homes or even 80 and returning to the layout that has been rejected before. I fear that

we will end up with poorly built homes out of keeping with a Cotswold stone area degrading our AONB status with properties positioned on a poorly designed site that floods and feels utilitarian. The site would evaporate the views and living standards of 80 adjacent residents. There will be a significant loss of privacy for adjoining properties especially at the point of entry and all exists including footpaths., There will be a loss of habitat safety and condensing of services without any additional provision.

xvii) Willersey cannot cope with anymore housing developments especially for the rich. The local young adults of this village can't afford to buy properties in the village and have to move into towns.

xviii) The infrastructure of the village cannot cope with more estates built.

xix) The area where it is planned is a beautiful area of fields and public right of way.

xx) The houses and bungalows which back onto this field have beautiful views which will disappear and will look into people's windows and to the rest of the proposed housing estate and will be difficult to sell because of this.

xxi) Loss of privacy, noise, pollution and impact to the local area.

xxii) Lack of a construction statement and traffic management plan.

xxiii) With infrequent buses, no meaningful employment in the area and no shop or upper school in the village the area fails the current needs for sustainable local living.

xxiv) It seems irresponsible to place a pond beside a play area for children which will have to be fenced. The swales shown are another health hazard with stagnant and contaminated water accumulation and a breeding ground for mosquitoes and diseases.

xxv) The entry point onto the site is totally inappropriate with a restricted access reduced width left hand bend.

xxvi) It's a really bad idea to have an entry point off a quiet established estate that passes Rose fronted style cottages with no footpaths and verges. There is a safety consideration to be understood with the increase in traffic throughout the existing estate.

xxvii) Due to previous developments in the village of Willersey it is now common in periods of heavy rain to see manhole covers lifting and raw sewage, diluted by rainwater, being discharge from the manhole. The reason for the pressure build-up causing the manhole cover to lift is not known but is likely to be due to either: -The pipes for the combined sewerage and drainage system being too small for the load in periods of heavy rain, or - a throttling of the input to the pumping station to prevent the station being overloaded. Whatever the reason, the fact that diluted unprocessed sewage is being discharge from manholes in the village means the combined sewerage and drainage system is inadequate for the total flow in periods of heavy rain.

xxviii) If residential was to be permitted, the NPPF, would require the efficient use of land. With a residential density of only about 20 units per Hectare, the application should be refused, as it would not be making efficient use of land for residential. 45 units would be far more appropriate. That could be achieved at the reserved matters stage through layout, design, and the dwelling mix matching the need. Examples would be predominantly terraces, with some flats; no detached properties; no garages, as they waste space becoming storage; use of internal road for parking, where achievable; inclusion of rooms in the roofs, as part of the design; and fewer 4 and 5 bedroom units. Through these type of measures, Suds; children's play space; Biodiversity e.t.c. areas would still be achievable. By modern standards the prevailing density would, at around 30 units per Hectare, using CDC method, be appropriate, for residential in such a location.

xxix) The school is currently at capacity. Children cannot be accommodated within year groups due to constraints on space, and there is very little outside provision, except by permission of the Parish Council. This means any primary age child will need, at the expense of the Local Authority, to transport children further afield, with the nearest facility being in another county.

xxx) Although some small local employers, the majority of employment is in Evesham, Cheltenham or Gloucester, necessitating vehicle requirement, as public transport is too limited to accommodate this for potential residents.

xxxi) There are no highway improvements planned in the application. Willersey suffers from speeding traffic.

xxxii) The development will also remove the demarcation between Willersey and Broadway. At present the fields provide a clear and natural break between the two villages, which are in different counties.

xxxiii) The Illustrative Masterplan document indicates a Maintenance Corridor on the eastern side of the proposed development site. The corridor contains the sewage pipe from the previous Folly View development. The maintenance corridor will become a major eye-sore without regular maintenance (i.e. grass cutting). The ditch will become a flood risk if not maintained and vegetation and silt is allowed to build up. Flooding occurred from the ditch where it goes under the Broadway Road due to poor maintenance. The farmer has taken action to ensure that the flood risk associated with the ditch where it runs through the proposed maintenance corridor is currently minimised. However, to maintain this state will require regular attention. If planning permission is granted it is requested that this is conditional on provision being made to ensure that appropriate maintenance is funded and regularly carried out on the maintenance corridor and ditch for the life of the development.

xxxiv) We are already restricted for parking spaces and also the development would destroy our green communal area. Plus the huge new amount of traffic

to the new development would be a safety issue with children playing out and pets.

xxxv) Willersey is completely lacking in facilities. There is no shop causing the residents to travel by car to Broadway and Evesham. There is a high proportion of elderly residents in Willersey and it already proves difficult to get doctor's appointments and more housing will only add to the problems. We already have flooding issues from sewers and despite Severn Trent's remedial works the problem still exists for some current homeowners. This proposed development is not in the approved local plan and should not therefore be permitted.

xxxvi) The reliance of many Willersey residents on critical services provided in neighbouring Worcestershire, due to the village's position on the county boundary, further exacerbates the local infrastructure deficit. The development's failure lies in its dependence on new residents using public transport or walking, without acknowledging the severe limitations of the existing network. Providing a bus timetable and encouraging walking is not an adequate or sustainable solution for creating a better, equitable society, particularly for those reliant on public transport for employment, healthcare, and education access in hubs such as Broadway and Evesham. The current public transport network is insufficient for this level of reliance, it is unacceptable that vulnerable people need to travel by bus to buy a pint of milk, and therefore the development is not a sustainable environmental solution in accordance with NPPF objectives.

xxxvii) Irreversible Visual Harm to the Cotswold National Landscape.

xxxviii) This is a backland site that lies beyond the established built form of Willersey. Development here would represent an inappropriate encroachment into open countryside and undermine the village's traditional linear character. The proposed layout would be out of keeping with the existing pattern of housing and would erode the rural setting of Broadway Road.

xxxix) Entry to Folly View is not wide enough to accept more traffic.

xl) The proposed road will detach and run between our house and our parking space and reduce the total number of spaces available for our use from 6 to 3 (between 3 houses). Currently, we can tandem park our cars, which ensures that the roads remain safe and clear of parked vehicles. The development would compromise this arrangement, leading to increased parking congestion and a significant reduction in the convenience, visibility and safety of access to our homes.

xli) The planning application has made no provisions to address the very real parking concerns. It is not acceptable to simply reduce the number of parking spaces without regard for the house owners, who will be significantly impacted by this development. This oversight demonstrates a lack of planning, goodwill, and consideration for those living in the affected properties.

xlii) Loss of wildlife habitat.

xliii) The developer's own consultation demonstrated that an overwhelming majority of respondents - 97% a significant percentage - were opposed to this scheme. Despite this clear feedback from local residents, the proposal remains essentially unchanged. This disregard for community views undermines the credibility and purpose of the consultation process.

xliv) The adjoining over 55 community would be severely affected by this inappropriate development.

xlv) Folly View is overburdened with parked cars every day, usually parked up on the pavement due to lack of space. Broadway Road has a speed limit of 40mph grinding down to 30mph in Folly View! Several children play daily in Folly View making their way to the green space which the developer provided and plans to remove in their plan to become a road.

xlvi) Impact on dark skies.

xlvii) Conflict with Local Plan Policies EN1, EN4, EN5, and EN7.

xlviii) Application field floods in winter.

xlix) Critical failure of the proposal to demonstrate sustainability, its adverse environmental and social impacts, and non-compliance with policies within the National Planning Policy Framework (NPPF) and the Cotswold District Local Plan (CDLP).

l) Harm to Cotswolds National Landscape. Conflict with NPPF 187. The development does not conserve and enhance the landscape and scenic beauty of this AONB.

li) The infrastructure for the village has already been significantly impacted by the Folly View, Willow Green and the joining of Francombe Estate to the existing sewage infrastructure. Flooding, which was a once in ten year event, has now become a regular occurrence sometimes up to 5 times a year, especially during prolonged periods of heavy rain. This affects Collin Lane, Blind Lane and Badsey Road under the railway bridge, with raw sewage being discharged in to the flood waters and into the gardens of Collin Lane in particular. The flood waters cause a backup of the sewage systems for properties on Collin Lane, Collin Close and others and stops the use of toilets and showers until the flooded sewage system subsides.

lii) Historic England is currently studying the final archaeological report of a neighbouring major iron age and Roman villa discovery in Willersey, to consider whether the area should be designated a scheduled monument for long-term protection. While the full extent of the nearby Iron Age settlement discovered in Willersey is still being uncovered, recent archaeological work suggests it is an extensive, multi-phase site that underlies later Roman structures. Geophysical surveys have helped to map its features beneath the ground. Uncovered features and dimensions suggest this Willersey site is potentially extensive and likely the reason why organized metal detectorists groups have from time-to-time focused attention on the 25/02983/OUT proposed development field.

liii) The existing parking arrangements in Folly View, although to residential standards, are plainly inadequate leading to casual parking of visiting cars and trade vans along the existing access road. At least 12 children from the adjoining houses play and socialise on the footways. If traffic is increased their safety and the safety of the vulnerable and the elderly residents will be put at risk. Some of the frontages, ironically sold to their occupiers by the very people behind their proposed development, will lose their amenity by the extended access road passing within as little as 4.5 metres away. The existing green space, enjoyed by all, will disappear.

liv) Inadequate sewage capacity and infrastructure.

lv) The construction of large numbers of houses off Broadway Road in the direction of Broadway has narrowed the gap between Willersey and Broadway. The construction of further houses as now proposed would erode that gap even further.

lvi) Recent months have seen well-documented instances of severely low water pressure and, in many cases, a complete failure by Thames Water to supply existing households. To approve further demand on a network that is already failing its statutory requirements would be, in my view, a reckless breach of sustainable development principles. I therefore request that the following points are strictly applied to any recommendation made to the Planning Committee: Strict Grampian Conditions: It is vital that a "negative" Grampian Condition is attached to any permission. This condition must explicitly prohibit the occupation of any new dwelling until the entire programme of off-site reinforcement works is completed, tested, and certified as operational by Thames Water. Evidence of Baseline Recovery: The Council must demand evidence that proposed upgrades will not only accommodate the new builds but will also resolve the existing systematic failures in the Willersey and Mickleton cluster. The "impact studies" mentioned by Thames Water must be made available for public and Parish Council scrutiny to ensure they are based on accurate, current performance data rather than outdated models. Cumulative Impact: Given that these two applications represent a significant percentage increase in the village's housing stock, they must be assessed as a single cumulative burden on the pumping and storage facilities serving this part of the Cotswolds.

Ivii) We are currently suffering flooding in the adjoining field to that of the proposed site with the watercourse which runs alongside our property almost full. After several days of rain the ground is saturated and the water which runs from the hillside pouring into the watercourse creating issues for properties in Field Lane where the water is running straight though the rear garden to the front of the house and further down to the rear of Collin Close reaching Collin Lane.

8.3 **Main Grounds of Support**

8.4 The Parish Council has campaigned on four points:

i) 1. Protect the AONB - I feel this is an ugly field which has no great "beauty" to protect.
2. Stop Sewer Flooding - The documents submitted indicate this has been considered and dealt with.
3. Infrastructure crisis - The GP would receive extra funding for extra patients, 30 houses does not represent a huge increase in patient numbers. I notice Barn Close has not objected. School places are a concern. The extra traffic on our roads would not be significant.
4. We don't want it. This is a 5-year old's argument.

i) I do want it. As we want our village to grow. Nationwide there is a shortage of houses which will last until this kind of NIMBY attitude exists.

ii) We have 2 pubs which are barely surviving, a fantastic farmers market which needs customers, and with an increased population we might even get a village shop again.

iii) The development looks well planned with possibilities for expansion.

8.5 **Gloucestershire Constabulary:**

8.5.1 'The Design and Access Statement includes the Secured by Design requirements within this Outline application but also any subsequent Reserved Matters applications. It would be advantageous for the applicants to contact the Designing Out Crime Officer for Gloucestershire Constabulary rather than Thames Valley as mentioned on Page 35. I would be happy to help with any SBD applications for this site.

8.5.2 To facilitate this, the inclusion of a condition would help ensure this conversation continues at each design stage, enabling this application to meet the requirements set out in the following documents

- *Section D.65, Paragraph (a) explains Open spaces, including streets and parks should be designed with adequate seating, gently sloping access routes, measures to reduce fear of crime, and an attractive appearance, so that people are encouraged to use them. Cotswold District Local Plan 2011-2031*

- *CIHT Residential Parking Design guidance note*
- *Security Overlay to the RIBA Plan of Work*
- *Chief Planning Officer's letter in July 2017 reminding Authorities of the importance to include crime prevention and counter terrorism security measures*
- *Section 4.6 detailing Layout and connectivity in Manual for Street, Department of Transport*
- *Paragraph 135 (f) of the National Planning Policy Framework (NPPF), Department for Levelling Up, Housing and Communities*
- *Paragraph P2 of the Public Spaces section in the Ministry of Housing, Communities and Local Government's National Design Guide*
- *Paragraph 12 of the Healthy and Safe Communities section of the Practical Planning Guidance (PPG) which replaced Safer places: the planning system and crime prevention in 2014*
- *Section 17 of the Crime and Disorder Act 1998 Page 2 of 2*

8.5.3 It is important to stress each of these documents place a requirement for the Planning Authority and the architect/ developer to create designs which prevent crime, the perceived fear of crime and ASB.'

8.6 **Cotswolds National Landscape Board**

16-page letter received. Main comments are:

'Landscape and Visual Impact

8.6.1 The site comprises a relatively flat, open agricultural field located at the western edge of Willersey, currently used as pastureland. It is bounded by existing residential development to the south (Folly View) and east, Willersey Footpath 9 to the north and north-east, and open countryside to the west and northwest. The site sits within a transitional landscape between the built-up village core and the surrounding rural landscape, making it sensitive to development pressure.

8.6.2 We note the applicant's reference to the Council's assessment contained within a 2014 study of land surrounding Key Settlements report which does not set out an in-principal objection to the development of the site on landscape grounds, subject to new development being of a high quality, however it is also of note that the site (promoted as part of a wider site for 80 homes) was assessed as unsuitable in the Council's 2021 Strategic Housing Land Availability Assessment. We also note the Council's preapplication advice to the applicant

regarding the need to create a soft, transitional edge to the settlement and to avoid an unduly dense roofscape.

8.6.3 Section 19.1of the Cotswolds AONB Landscape Strategy and Guidelines (LS&G) referenced above highlights how the development and expansion of settlements can give rise to potential adverse landscape implications including:

- *Intrusion of expanded settlement fringes into the landscape including within the setting of the AONB;*
- *Degradation of views to, from and across the AONB;*
- *Proliferation of suburban building styles, housing estate layout and materials;*
- *Upgrading of minor roads and lanes associated with new development and the introduction of suburbanising features such as mini roundabouts, street lighting, highway fencing, kerbs and traffic calming measures;*
- *Increased traffic leading to increased damage to road verges and roadside hedges and walls and the creation of informal passing places;*
- *Introduction and accumulation of lit areas and erosion of characteristically dark skies.*

8.6.4 The proposal would extend built form into open countryside and would impact the landscape character of the Unwooded Vale Landscape Character Type (and specifically the Vale of Evesham Fringe within which it is located. The character of this landscape is defined by open, gently rolling agricultural fields, mature hedgerows, scattered trees, and a sparse settlement pattern. It retains strong visual connectivity with the Cotswold Escarpment and has historically been shaped by hedgerow field boundaries and the presence of ridge and furrow features.

8.6.5 Whilst the site contributes to the agricultural landscape that defines the village's setting and forms part of the transition between the built form and the surrounding countryside , the character of the site is influenced by the adjacent urban development at Folly View and Field Close and it does not exhibit historical features to the same extent as other neighbouring parcels of land. Therefore, we agree with the LVIA's assessment that the development would give rise to a minor adverse effect on the character of the Unwooded Vale LCT.

8.6.6 As far as the impact of the development on landscape character of the Escarpment is concerned, the proposed development would only have the potential for indirect perceptual change to be experienced within it rather than any physical change. We agree with the visual assessment which concludes limited change from publicly accessible locations on the Escarpment would

arise. Therefore, we consider that the change and effect upon the landscape character of the Escarpment would be at worst minor at both Year 1 and Year 15.

8.6.7 The LVIA photography illustrates that even from Viewpoint 7 on Willersey Bridleway 14 where the site is perhaps most clearly seen from the Escarpment, the development would sit behind the Folly View development and would not extend the perception of built form extending further westwards whilst it would also be seen in the context of development to the east at Field Lane/Collin Close and Maurice Gardens to the north. Whilst we do not necessarily agree with the LVIA's assessment of a negligible level of effect, we would consider that it would not exceed minor from this and other viewpoints on the Escarpment.

8.6.8 The key visual impact is the effect of the development on views back to the Escarpment from Footpath 9 (Viewpoints 1 and 2), views to the Escarpment being one of the CNL's special qualities outlined at Section 4 of the CNL Management Plan. Whilst the current baseline view from this location features the dwellings at Folly View and Field View creating a strip of urban form, the ridges of the houses only reach mid-way up the Escarpment and in some places glimpsed views of the lower slopes are possible. The development would bring that urban form significantly closer to the receptor and further reduce the views of the Escarpment.

8.6.9 Photomontages illustrate that only parts of the wooded upper parts of the Escarpment would remain visible above the rooftops, whilst views of the mid and lower Escarpment fields would be blocked. We do not agree with the applicant's assessment that the scheme has a varied roofscape as advised by the Council, in particular along the sensitive northern edge. However, we do agree with the assessment that the development would have a major/moderate level of effect at Year 1, based on the photomontages and landscaping proposals shown, this would remain major/moderate, i.e. significant, at Year 15, particularly from Viewpoint 1.

8.6.10 We note that the 30-dwelling proposal has been scaled back from an initial proposal for 50 dwellings occupying the whole field and the developed edge has therefore been pulled back from Footpath 9 and as such has its impacts have been moderated to an extent. However, we agree with the applicant's assessment that these impacts at Year 1 and 15 would still be significant and recommend that they are moderated further.

8.6.11 We consider that this could be achieved by reducing the heights of plots 17-22 to single storey dwellings, and increasing the planting along the northern boundary to mitigate impact on views from Footpath 9 back towards the Escarpment and better contain the development, vary the roofscape and aid the creation of a soft, transitional edge to the settlement. This would also align with the Council's preapplication feedback that the development should feature "variations in building heights and massing to avoid uniformity and excessive built form clustering". This should not be to screen the development entirely, but to reduce the current prominent appearance of these two-storey, 8.8m high dwellings and their impact on blocking large parts of the Escarpment from view. The use of estate railings is also not supported in isolation due to their somewhat stark, urban appearance.

8.6.12 It is acknowledged that this application is made in outline form with matters relating to layout, scale and landscaping to be determined at a future reserved matters stage should outline planning permission be granted, however we recommend that at the very least a building heights parameter plan is required to form part of the set of approved plans with which a future reserved matters application should substantially accord.

8.6.13 We also note and support the Council's Landscape Consultant's observation that "The section of the LVIA titled "Likely Effects upon Cotswolds National Landscape Special Qualities" is therefore welcomed and demonstrates appropriate recognition of the designation. However, while a qualitative review of several special qualities is provided, no assessment of magnitude of change or level of effect is presented. This should be quantified to provide clarity on the degree to which the proposal would influence the special qualities and perceptual attributes of the National Landscape, in line with best practice guidance". As stated above, we consider that the proposal as currently submitted is likely to give rise to significant adverse impacts on views to the Escarpment, one of the identified special qualities.

8.6.14 Currently we consider that the proposal conflicts with the Board's policies and guidance, in particular Section 19.1 of the Cotswolds AONB Landscape Strategy and Guidelines; namely 'the degradation of views to, from and across the AONB' and does not accord with the LS&G's recommendations to 'Avoid development that will intrude negatively into the landscape and cannot be successfully mitigated, for example, extensions to settlements in areas of open landscape' and 'Ensure that new development does not adversely affect the wider rural landscape and views to and from the AONB'.

8.6.15 As such, we consider that the proposal as it stands would not conserve and enhance the landscape and scenic beauty of the CNL and does not accord with Policy EN5 and paragraph 189 of the NPPF as well as with Policies CE1 and CE13 of the CNL Management Plan. We consider that based on the information submitted, the proposal could do more to moderate its detrimental impacts on the National Landscape and therefore that test C of NPPF paragraph 190 has not yet been passed.

Lighting and Dark Skies

8.6.16 Light pollution occurs in the form of light trespass where light shines where not needed, sky glow where light appears over towns and cities and glare, which is the uncomfortable reaction when a light source is viewed within a dark atmosphere. These all contribute to the erosion of 'dark skies' and the ability to view the stars at night.

8.6.17 No information has been submitted in respect of lighting with the applicant stating that it will be considered at reserved matters stage, should outline planning permission be granted.

8.6.18 Paragraph 198c of the NPPF states that planning decisions should ensure that new development is appropriate for its location and in doing so they should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. Paragraph 001 of the PPG on Light Pollution (Paragraph: 001 Reference ID: 31-001-20191101) states that "intrinsically dark landscapes' are those entirely, or largely, uninterrupted by artificial light. National parks … can serve as good examples". As National Landscapes have the same level of protection with regards to landscape and scenic beauty as national parks within the NPPF and PPG and dark skies are one of the special qualities of the Cotswolds National Landscape, we consider it reasonable to treat the National Landscape as an 'intrinsically dark landscape' in NPPF and PPG terms. Policy CE6 of the National Landscape Management Plan states that proposals that have the potential to impact on the dark skies of the CNL should be delivered in a way that is compatible with and seek to further the conservation and enhancement of these dark skies, by seeking to avoid and where avoiding is not possible, minimise lighting.

8.6.19 Street lighting and other external lighting should be kept to a minimum and we recommend that a detailed lighting scheme should be submitted which demonstrates compliance with the requirements of with Guidance Note 01/21 on The Reduction of Obtrusive Light, published by the Institution of Lighting

Professionals (ILP) (which forms Appendix 2 of the Board's Position Statement on Dark Skies and Artificial Light, referenced above).

8.6.20 We would recommend that the relevant 'environmental zone' for which compliance should be assessed is Environmental Zone E1 which relates to National Landscapes to mitigate any adverse impact and ensure that all lighting meets the standards to preserve the dark skies and landscape character of the Cotswolds National Landscape.

8.6.21 We would also recommend that the lighting strategy should comply with relevant aspects:

- *Guidance Note 01/21 on The Reduction of Obtrusive Light, published by the Institution of Lighting Professionals (ILP) (which forms Appendix 2 of the Board's Position Statement on Dark Skies and Artificial Light, referenced above);*
- *Towards a Dark Sky Standard, published by the UK Dark Skies Partnership (link);*
- *Dark Skies Technical Advice Note (May 2021), published by South Downs National Park Authority (link);*
- *Dark Skies Technical Advice Note Appendix - Glazing (May 2021), published by South Downs National Park Authority (link);*
- *Lighting Design Guide (July 2023), published by Dedham Vale National Landscape and Coast & Heaths National Landscape (link)*

8.6.22 The Board has also recently adopted further Technical Lighting Design Guidance which will be provided to the LPA once published on our website.

8.6.23 Parts of Willersey, including Main Street, are not street lit and consideration should be given, in the context of seeking to avoid and where avoiding is not possible, minimise lighting to conserve darks skies, to minimising street lighting. Without prejudice, if the local authority is minded to grant planning permission, planning conditions should be imposed which seek to mitigate any adverse impact and ensure that all lighting meets the standards outlined above and will be limited to low-level, down-facing lights to preserve the landscape character and natural beauty of the Cotswolds National Landscape.

<u>Public interest</u>

8.6.24 When assessing whether the proposed development is in the public interest, it is important to note that National Landscapes are landscapes whose

distinctive character and natural beauty are so outstanding that it is in the nation's interest to safeguard them. It is also important to note that the Government has stated that 'meeting housing need is never a reason to cause unacceptable harm to [National Landscapes]' (Ministry of Housing, Communities & Local Government (2021) Government response to the local housing need proposals in 'Changes to the current planning system).

8.6.25 We consider that the harm caused by the proposed development as currently submitted would be unacceptable in this regard and would not be in the public interest.

Conclusion

8.6.26 The Board considers that the proposal comprises major development within the CNL for the purposes of NPPF paragraph 190 and therefore permission should be refused other than in exceptional circumstances and where it can be demonstrated that the proposal is in the public interest. At this stage we consider that the major development 'tests' outlined at paragraph 190 have not been passed to demonstrate that exceptional circumstances exist and that the development would be in the public interest.

8.6.27 We consider that the proposal as submitted would not conserve and enhance the landscape and scenic beauty of the CNL and consequently the application does not accord with Cotswold Local Plan Policy EN5 and paragraph 189 of the NPPF as well as with Policies CE1, CE13 and CE15 of the CNL Management Plan.

8.6.28 We consider that this represents a strong reason for refusal in NPPF paragraph 11d)i) terms and that the 'tilted balance' should not be engaged, however this could be overcome if our recommendations could be incorporated.

8.6.29 Furthermore, the proposal has not demonstrated how it seeks to further the purpose of the CNL's designation, that being the conservation and enhancement of its natural beauty as required by s.85 of the CRoW Act. Accordingly, the Board considers that if the LPA were minded to grant planning permission for the proposal as submitted, it may not have fulfilled the statutory duty to seek to further the purpose of CNL designation.

8.6.30 We recommend the following should be provided to support a case that exceptional circumstances do apply for this application and potentially overcome this holding objection:

- *Evidence of housing need specific to Willersey, in line with the recommendations of Policy CE15 of the CNL Management Plan 2025-2030 which states that windfall housing proposals on undeveloped land adjoining, or outside of, built up area boundaries (or equivalent) should only be supported where there is robust evidence of a specific local housing need.*
- *Justification for how that need specific to Willersey will not be met by the site allocated within the current Local Plan, for which there is a live planning application.*
- *Revisions to building heights and landscaping treatments to demonstrate that the development can moderate the assessed significant adverse impacts on the development on views to the Cotswold Escarpment from Footpath 9, these views being one of the CNL's special qualities, to an acceptable degree. Acknowledging that this is an outline application, as a minimum this information should include a building heights parameter plan to form part of the set of approved plans with which a future reserved matters application should substantially accord.*

8.6.31 We recommend that the Council should not determine this application until after the further information that we have requested has been provided and the Board and other consultees have provided comments on that further information.

8.6.32 DEFRA guidance for relevant authorities (referred to in Appendix 1 below) states that as far as is reasonably practical, relevant authorities should seek to avoid harm and contribute to the conservation and enhancement of the natural beauty, special qualities, and key characteristics of Protected Landscapes. This goes beyond mitigation and like for like measures and replacement. The proposed measures to further the statutory purpose of a National Landscape should explore what is possible in addition to avoiding and mitigating the effects of the development, and should be appropriate, proportionate to the type and scale of the development and its implications for the area and effectively secured.

8.6.33 The 'seek to further' duty does not preclude decisions that are 'net harmful' to the natural beauty of a National Landscape. However, positive evidence is required to demonstrate that the relevant authority has, in all the circumstances, sought to further the purpose, not merely through mitigation of harm but by taking all reasonable steps to further the purpose.

8.6.34 Without prejudice, if the LPA is minded to permit this application, it should provide proportionate, reasoned, and documented evidence to

demonstrate how it sought to further the purpose, not merely through mitigation of harm but by taking all reasonable steps to further the purpose. If it is not practicable or feasible to take measures to further this purpose, the LPA should provide evidence to show why it is not practicable or feasible.'

9. Applicant's Supporting Information:

- Air Quality Assessment
- Archaeological Evaluation
- Design & Access Statement
- Ecological Appraisal Report
- Flood Risk Assessment and Drainage Strategy
- Magnetometer Survey Report
- Phase 1 Desk Study (contamination)
- Planning Statement
- Preliminary Arboricultural Impact Assessment
- Statement of Community Involvement
- Sustainability and Energy Statement
- Transport Statement
- Travel Plan Statement
- Waste Minimisation Statement
- Landscape and Visual Impact Assessment
- Biodiversity Net Gain Statement and Metric Calculations

10. Officer's Assessment:

Proposed Development

10.1 This application is seeking Outline planning permission for the *' erection of up to 30 dwellings with associated means of access, car parking, public open space, landscaping, sustainable drainage system (SuDS) and associated infrastructure.'* Details relating to Access form part of this application. However, other details relating to Appearance, Scale, Layout and Landscaping have been reserved for subsequent reserved matters approval should Outline permission be granted. This application therefore seeks to establish the principle of development on the site rather than its final design or layout.

10.2 The proposed scheme seeks permission for the erection of up to 30 dwellings, of which 40% would be affordable dwellings and 5% would be self-build/custom build plots. A development of 30 dwellings would generate 12 affordable dwellings and 1 self-build/custom build plot.

10.3 The applicant has submitted an indicative layout with this application which is intended to demonstrate how the application site could reasonably accommodate the level of development being proposed. The layout shows housing focused on the southern, central, eastern parts of the application site, as well as along part of its northern boundary. The western part of the site is shown as a green buffer, incorporating flood attenuation and a children's play area.

10.4 The proposed development would be served by a new vehicular/pedestrian entrance to the south of the application site and by a pedestrian entrance located in its north-eastern corner. The proposed vehicular/pedestrian entrance would extend through an existing grassed area located in the eastern part of the Folly View residential development to the south of the application site. It is proposed to create a new roadway/footway from the application field to the existing estate road serving Folly View. The new roadway would measure approximately 50m in length and would join on to the aforementioned estate road at a point approximately 60m to the north of the B4632 Broadway Road.

10.5 In addition to the proposed new vehicular access, it is also proposed to create a new pedestrian entrance in the north-eastern corner of the application site. The proposed entrance would connect with an existing Public Right of Way which extends around the eastern and northern boundaries of the field lying to the north of the application site. The existing Public Right of Way links into Hays Close and Collin Close to the north-east of the application site, through which it is possible to reach the centre of the village.

10.6 The number of dwellings proposed for the site has been reduced following pre-application discussions with Council Officers. The original pre-application proposal sought advice on a scheme for 50 dwellings that would have extended across the whole of the larger field. The indicative mix of housing includes a mix of 1, 2, 3, 4 and 5 bed dwellings, with 0.65 hectares of the site being set aside for green infrastructure.

(a) Residential Development Outside a Principal or Non-Principal Settlement

10.7 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 planning application is therefore the current development plan for the District which is the Cotswold District Local Plan 2011-2031.

10.8 In addition to the above, it is noted that policies in the current National Planning Policy Framework (NPPF) (December 2024) represent a significant material consideration when assessing this application. It is also noted that the Government published a new draft version of the National Planning Policy Framework (NPPF) for consultation on the 16th December 2025. The consultation period for the aforementioned document expires on the 10th March 2026 and it is anticipated that a final version of the new NPPF will be released in Spring 2026. Whilst the draft NPPF is a consultation document, it is considered that the proposed policies within it are a material consideration and must be given a degree of weight at the present time. The relevant draft policies will be referred to in this report in addition to those policies in the existing NPPF.

10.9 The application site is located outside Willersey Development Boundary. The following Local Plan policy is considered applicable to this proposal:

10.10 Local Plan Policy DS4: Open Market Housing Outside Development Boundaries and Non-Principal Settlements

New-build open market housing will not be permitted outside Principal and Non-Principal Settlements unless it is in accordance with other policies that expressly deal with residential development in such locations.

10.11 The current scheme would result in the erection of new build open market housing outside a development boundary and is therefore considered to be contrary to the above policy.

10.12 Notwithstanding the above, it is noted that the Council also has to have regard to policies in the National Planning Policy Framework (NPPF) and guidance in the Planning Practice Guidance (PPG) when reaching a decision. The current NPPF and the PPG represent significant material considerations. In particular, it is noted that the December 2024 update of the NPPF, in combination with the updated PPG on Housing and Economic Needs Assessment, introduced a new standard method for calculating local housing need. Prior to the December changes to the NPPF and PPG, the Council could demonstrate a 7.3 year supply of housing land. It was therefore comfortably meeting its requirement to provide a 5 year supply of such land. However, as a result of the aforementioned changes the Council can now only demonstrate a 1.8 year supply.

10.13 Prior to December 2024, the Council's 5 year supply was measured against the residual Local Plan housing requirement, which was 265 homes per year (based on the Housing Land Supply Report August 2023). However, the new standard method means that the Council's 5 year supply must now be measured against

the standard methodology calculation of the number of homes needed in the district, which increased in December 2024 from 504 to 1036 homes per annum. The December changes to the NPPF therefore result in the Council having to deliver a far higher number of dwellings than that required prior to December 2024. As the supply figure is now under 5 years, it is necessary to have regard to paragraph 11 of the NPPF, which states:

11. Plans and decisions should apply a presumption in favour of sustainable development.

For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date , granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

10.14 Footnote 8 of the NPPF advises that *'out-of-date'* for the purposes of paragraph 11 includes *'for applications involving the provision of housing, situations where: the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer as set out in paragraph 78): or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirements over the previous three years.'* In light of this guidance, it is considered that Local Plan Policy DS4 is out-of-date at the present time and that paragraph 11 is engaged in such circumstances.

10.15 In the case of criterion d) i) of paragraph 11, it is noted that footnote 7 of the NPPF advises that areas or assets of particular importance can include National

Landscapes. Harm to such an area can therefore provide a strong reason to refuse an application for housing even if a 5-year supply of housing land cannot be demonstrated. With regard to criterion d ii), it is necessary to weigh the benefits arising from the scheme, such as the delivery of housing, including affordable housing, against the adverse impacts of the proposal. These aspects of the proposal will be addressed later in this report. However, in the case of criterion d) ii), it is evident that the adverse impacts would have to significantly and demonstrably outweigh the benefits in order for an application to be refused.

10.16 With regard to the consultation draft NPPF and new housing outside settlements, it is noted that the aforementioned document replaces the criteria set out in paragraph 11 with a new policy which sets out the type of development that is acceptable outside settlements. In instances when a Council cannot demonstrate a 5-year supply of deliverable housing site, draft Policy S5 states:

S5: Principle of development outside settlements

'1. Only certain forms of development should be approved outside settlements, as set out in the following list. These should be approved, unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework:

j. Development which would address an evidenced unmet need (including, but not limited to, development proposals involving the provision of housing where the local planning authority cannot demonstrate a five year supply of deliverable housing sites or scores below 75% in the most recent Housing Delivery Test28), and where the development would:

i. be well related to an existing settlement (unless the nature of the development would make this inappropriate) and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure; or

ii. ii. comprise major development for storage and distribution purposes which accords with policy E3.

2. In applying this policy, the circumstances in which the benefits of approving development proposals are likely to be substantially outweighed by adverse effects include, but are not restricted to, situations where the development proposal would fail to comply with one of the national decision-making policies

which state that development proposals should be refused in specific circumstances. '

10.17 In the case of applications such as the one now submitted, it is evident that the draft policy states that, where there is a shortfall in housing land supply, such applications should be well related to an existing settlement and be of a scale which can be accommodated taking into account the availability of existing or proposed infrastructure. Paragraph 1 of Policy S5 states that such application should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in the draft NPPF. These aspects of the proposal will be addressed in the following sections of this report.

10.18 With regard to the application site itself, it is noted that the current site forms part of a larger field that has been assessed as part of the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA) process. The site is referenced as *'W8B Land west of Field Close & north of B4632'* the Strategic Housing and Economic Land Availability Assessment Update October 2021. It states that the site proposal is for 80 dwellings.

10.19 The SHELAA assessment states:

Unsuitable - The site is within the AONB and is exposed with clear views from the road and the hills to the south and the wider AONB. It is also viewed from the Public Right of Way to the north. It is a relatively flat field with a strong rural character at Willersey's eastern entrance. The field is in active agricultural use as animal pasture and has ridge and furrow.

10.20 The application site occupies the southern part of the site assessed in the SHELAA. It does not therefore extend as far north as the site referenced in the SHELAA.

10.21 The application site adjoins existing village development on 2 sites and within walking and cycling distance of the village centre. It is therefore considered to be well-related to the settlement of Willersey when assessed against draft NPPF Policy S5.

10.22 With regard to the size of the proposed development relative to the size of the village as a whole, the Council's Local Plan Review Preferred Options Consultation November 2025 states that Willersey has 458 dwellings at the time of publication. With regard to residential development in the current Local Plan period, the Cotswold District Housing Land Supply Report - May 2025 states

that 89 dwellings have been built in the village in the period between the 1st April 2011 and the 31st March 2024. In addition, as of the 1st April 2024 extant permissions totalled 8 dwellings. This equates to a total of 97 dwellings. For comparison, the nearby village of Mickleton has been subject to 266 completions and commitments in the same period. In addition to the aforementioned completions and extant permissions, Local Plan allocations in Willersey total 54 dwellings. This includes the land lying to the east of Willersey Industrial Estate which has a guideline figure of 49 dwellings, and a garage/workshop site in the centre of the village with an indicative guide of 5 dwellings. The site adjacent to the industrial estate is located on the north-eastern edge of the settlement and is therefore located at the opposite end of the village to the current application site. There is no direct visual or physical interconnectivity between the 2 sites. With regard to the aforementioned allocated site, it is noted that a Full planning application for the erection of 60 dwellings on the site was validated in November 2025 and is currently live (25/02687/FUL). A separate application for 60 applications on the allocated site is therefore being assessed at the current time and has to be taken into account when considering this Outline application. An application has not been received in relation to the garage/workshop site in the centre of the village.

10.23 Having regard to the size of the settlement as a whole, including its growth since 2011, it is considered that the introduction of 30 dwellings on this site would not represent a disproportionate increase in the size of the settlement in terms of dwelling numbers. In terms of services and facilities, the village hosts a primary school, employment estate, church, village hall, petrol station/vehicle garage and 2 public houses. Regular bus services also pass through the village. The settlement benefits from a range of services and facilities which are in reasonable walking and cycling distance of the application site. The creation of the public footpath connection in the north-eastern corner of the application site would also mean that the site would be located approximately 400m from the village centre, 600m from the primary school and 800m from the employment estate. Paragraph 4.4.1 of Manual for Streets (MfS) states that walkable neighbourhoods are typically characterised as having a range of facilities within a 10-minute walking distance (c.800m). It is noted that MfS also states that this is not an upper limit, and that walking offers the greatest potential to replace short car trips, particularly those under 2km. Access to the village centre would also be available along the B4632 Broadway Road to the south of the application site, on which bus stops can be found.

10.24 With regard to the attractiveness and safety of the available routes, it is noted that the north-eastern route to the village centre avoids main roads and passes through residential areas. It is also relatively flat and is illuminated. It is

considered that the application site does therefore provide good connectivity to existing services and facilities for pedestrians and cyclists and does offer alternatives to the use of the private motor car in this respect. Whilst it is noted that future residents would likely be dependent on the use of the private motor car to undertake trips relating to retail, healthcare and leisure, the rural nature of the District means that the availability of all such services within a single settlement within the District is very limited. In addition, the erection of 30 dwellings is considered to be modest in number and not to represent a strategic level of development. As a consequence, it is necessary to offer a degree of flexibility in relation to sites such as this, which can offer good accessibility to existing services and facilities in the settlement, whilst also being within relatively close proximity to other settlements, such as Chipping Campden or Mickleton, which can offer a range of other services and facilities. In addition, future residents would have reasonable access to bus services to locations such as Stratford-upon-Avon, Cheltenham and Chipping Campden. It is considered that there would be a reasonable range of transport modes on offer for future residents of the development. It is considered that Paragraph 83 of the NPPF is of relevance to this proposal and represents a significant material consideration. It states that *'housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby'.*

10.25 In light of the above and having regard to the relatively modest size of the proposed development and its rural location, it is considered that the proposal does not conflict with key paragraphs in the NPPF such as paragraph 110 which states that *'..... Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making'* and 'paragraph 129 c which supports development which makes efficient use of land, whilst taking into account *'the availability and capacity of infrastructure and services - both existing and proposed - as well as their potential for future improvement and the scope to promote sustainable travel modes that limit future car use'.* In the case of this proposal, it is noted that Gloucestershire County Council (GCC) Community Infrastructure advises that the village's primary school has capacity to accommodate children from the proposed development. In addition, the highway network can reasonably accommodate the level of proposed development and the scheme could

benefit local facilities such as the public houses, garage, employment estate and church. Existing services and facilities are within walking and cycling distance of the site and bus services are also available. With regard to healthcare, NHS Gloucestershire has not responded to the application. Concerns raised by objectors regarding drainage infrastructure are noted and will be addressed in detail later in this report.

10.26 With regard to the consultation draft NPPF, Policy CC2 states that:

'1. In order to contribute to climate change mitigation and the transition to net zero, development proposals should, where relevant to the proposal:

a. Be located where a genuine choice of sustainable transport modes exists, and improve opportunities for walking, wheeling, cycling and public transport, in accordance with policies TR3 and TR4;

b. Support good access to facilities to limit the need to travel, whether through the development's location, through development densities which improve catchment populations for local services, or by incorporating community facilities and premises to support local employment opportunities; '

10.27 Draft NPPF Policy TR3 states:

1. So that development is located where it can support sustainable patterns of movement, enable good accessibility for different users and make the most of existing and proposed transport infrastructure, development proposals should reflect the following principles, taking into account the vision for the site, the type of development and its location:

a. Development proposals which could generate a significant amount of movement, in the context of the area within which they would be situated, should be in locations that are, or can be made sustainable, by limiting the need to travel and offering a genuine choice of transport modes for residents and users, unless the nature of the use makes this impractical;

b. Opportunities should be taken to utilise existing or proposed transport infrastructure in optimising the amount or density of development which can be accommodated in different locations, especially where this can support more walking, wheeling, cycling and public transport use;

c. The environmental impacts of traffic and transport infrastructure should be identified, assessed and taken into account - including taking opportunities to

avoid or mitigate any adverse environmental effects, and to secure net environmental gains such as reductions in air pollution;

d. In rural areas, opportunities to improve wheeling, cycling and public transport and enhance the connectivity of an area should be taken where they exist and can be supported by the development proposed.'

10.28 In relation to the above draft policies, it is noted that the application site is located adjacent to a Principal Settlement wherein new residential development is acceptable in principle. The Local Plan has established that the village of Willersey has sufficient services, facilities and infrastructure to accommodate housing growth over the course of the Local Plan period. In addition, for the reasons set out previously, the site has reasonable accessibility to a range of services and facilities by means other than the private motor car. Having regard to the rural nature of the District and the limited availability of services and facilities in most the settlements within it, it is considered that village of Willersey does constitute a sustainable location for the size of development now being proposed.

10.29 It is considered that the erection of 30 dwellings onto this site would not represent a disproportionate increase in the size of the settlement.

10.30 With regard to the cumulative impact of this proposal and the 60 dwellings proposed on the allocated site to the east of Willersey Industrial Estate/Business Park, it is noted that the 2 sites are located at opposite ends of the village. The 2 sites are approximately 600m apart (as the crow flies). As a consequence, there is no direct visual or physical interconnectivity between the 2 sites. The respective developments would therefore appear as distinct entities. In this respect, the proposed developments would result in incremental extensions of the settlement rather than a single large expansion which would potentially extend further into the countryside than the schemes now proposed. As a result, the proposals are considered not to unbalance the settlement. Main Street will remain at the heart of the village and continue to define its character as at present.

10.31 In terms of infrastructure, GCC Community Infrastructure considers that the village primary school has capacity to accommodate the 60 dwelling scheme in addition to the 30 dwellings proposed on this site. Furthermore, the amount of traffic generated by the proposed developments is considered not to have an adverse impact on the operation of the local highway network. It must also be noted that the 60 dwelling site is allocated for residential development in the Local Plan, indicating that the village has a level of services and facilities which

can accommodate future growth in housing numbers. Whilst the Local Plan has set out a guide of 49 dwellings for the respective site, the aforementioned figure is not a rigid maximum. It is simply an indication of the level of development that could reasonably be accommodated on the site, based on the District's housing needs at the time of the adoption of the Local Plan in 2018. On the basis that the Council's housing requirements are now out of date, it is considered that limited weight can be attached to the 49 dwelling figure. The housing numbers set out in the Local Plan cannot therefore be taken as an absolute maximum when considering the future growth of the settlement. In considering the 2 current applications for residential development, it is considered that the additional 41 dwellings arising from this current application and the additional units on the allocated site would not represent an excessive increase in housing numbers above that already allocated in the Local Plan. The 2 proposals are therefore considered not to have an adverse cumulative impact on the settlement, either in terms of its rural character or on services, facilities or infrastructure capacity.

(b) Housing Mix and Affordable Housing

10.32 With regard to housing mix and affordable housing, the following Local Plan policies are considered relevant to this proposal:

10.33 Policy H1 Housing Mix and Tenure to Meet Local Needs

1. *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. Developers will be required to comply with the Nationally Described Space Standard.*

2. Any affordable accommodation with 2 or more bedrooms will be expected to be houses or bungalows unless there is a need for flats or specialist accommodation.

3. Proposals of more than 20 dwellings will be expected to provide 5% of dwelling plots for sale as serviced self or custom build plots, unless demand identified on the Local Planning Authority's Self-Build and Custom Register or other relevant evidence demonstrates there is a higher or lower level of demand for plots.

4. Starter Homes will be provided by developers in accordance with Regulations and national Policy and Guidance.

5. Exception sites for Starter Homes on land that has been in commercial or industrial use, and which has not currently been identified for residential development will be considered.

10.34 Policy H2 Affordable Housing

1. *All housing developments that provide 11 or more new dwellings (net) or have a combined gross floorspace of over 1,000 square metres, will be expected to contribute towards affordable housing provision to meet the identified need in the District and address the Council's strategic objectives on affordable housing.*

2. In settlements in rural areas , as defined under s157 of the Housing Act 1985, all housing developments that provide 6 to 10 new dwellings (net) will make a financial contribution by way of a commuted sum towards the District's affordable housing need subject to viability. Where financial contributions are required payment will be made upon completion of development.

3. The affordable housing requirement on all sites requiring a contribution, subject to viability is:

i. Up to 30% of new dwellings gross on brownfield sites; and
ii. Up to 40% of new dwellings gross on all other sites.

4. In exceptional circumstances consideration may be given to accepting a financial contribution from the developer where it is justified that affordable housing cannot be delivered on-site, or that the District's need for affordable housing can be better satisfied through this route. A financial contribution will also be required for each partial number of affordable units calculated to be provided on site.

5. The type, size and mix, including the tenure split, of affordable housing will be expected to address the identified and prioritised housing needs of the District and designed to be tenure blind and distributed in clusters across the development to be agreed with the Council. It will be expected that affordable housing will be provided on site as completed dwellings by the developer, unless an alternative contribution is agreed, such as serviced plots.

6. Where viability is questioned or a commuted sum is considered, an "open book" assessment will be required. The local planning authority will arrange for an external assessment which will be paid for by the developer.

10.35 The applicant is proposing to provide 12 affordable dwellings. The aforementioned figure equates to 40% of the proposed dwellings and is therefore in accordance with Local Plan Policy H2. The Council's Housing Officer has recommended a mix of 2 one bed flats, 4 two bed flats, 4 two bed dwellings, 1 three bed dwelling and 1 four bed dwelling. In terms of tenure, the proposed housing would comprise 6 social rented units, 2 affordable rented units, 3 shared ownership units and 1 First Home. The Housing Officer advises that there are currently 55 households that qualify for affordable housing in Willersey and neighbouring parishes. The current proposal would therefore make a valuable contribution to the delivery of affordable housing in the area and meet an identified need. The provision of affordable housing is therefore considered to represent a significant material consideration that weighs in favour of the proposed development.

10.36 With regard to the mix of open market dwellings, it is considered necessary to ensure that a mechanism is put in place to secure an appropriate mix of market dwellings, as required by Local Plan Policy H1. It would not be possible to control the mix of the open market housing at the reserved matters stage, which is limited to matters relating to scale, layout, appearance, access and landscaping. The provision of larger, more expensive dwellings for open market sale can increase average house prices across the District, which can then increase the Council's housing needs and its housing affordability issues, both in the affordable and open market sectors. A higher average house price can mean that more persons fall into housing need. In contrast, the provision of smaller 1, 2 and 3 bed open market dwellings can more reasonably address such an issue. Figures from the Office for National Statistics (ONS) indicate that the ratio between median house prices and median gross annual earnings in Cotswold District in 2024 (based on a 5 year average) was 14.64 times. In comparison, the difference was 5.63 times in 1997. The provision of a high percentage of 4 and 5 bed dwellings simply adds to the price differential and does little to address the Council's issues relating to house price affordability. In addition, the latest ONS figures issued at the end of October 2025 project that the number of one-person and multiple adult households without dependent children would rise from 71.7% to 76.4% of all households by 2032, and that average household sizes would drop from 2.54 to 2.24 in the same period. There is therefore a growing need for smaller units to meet changes in household sizes and composition.

10.37 The Council's Local Plan Partial Update Issues and Options Consultation document states that *'Building more and more houses to reduce house prices (or "Build, Build, Build", as Boris Johnson puts it) does not work, particularly in*

Cotswold District. There is much evidence to support this. Cotswold District has delivered significantly more housing than has been required in recent years, yet housing affordability has continued to worsen.' With regard to potential future Local Plan policy, it goes on to state that *'smaller homes are generally more affordable, so a policy requirement could be introduced for a higher proportion of 1, 2 and 3 bedroom market houses, and fewer 4 and 5 bedroom houses.'* It is noted that Table A2.19 of the Gloucestershire Strategic Housing Market Assessment Update Final March 2014 states that 80% of new market accommodation required in Cotswold District in the period up to 2031 would be 1, 2 and 3 bed units, with just 20% being 4 bed dwellings and above. In order to ensure that an appropriate mix of open market housing is provided, it is considered that the matter is addressed by condition or as part of the S106 agreement.

10.38 The submitted information states that the proposed dwellings would consist of an indicative mix of 1, 2, 3, 4 and 5 bed properties. It has been agreed that no more than 8 of the dwellings would be 4 bed or larger. A condition is recommended that would limit the proposed development accordingly. This would ensure that the mix of housing reasonably accords with the requirements of Policy H1.

10.39 The applicant is proposing to provide 1 self-build/custom build plot in accordance with the requirements of Local Plan Policy H1.

10.40 The delivery of affordable housing and the self-build/custom build plot would be secured through a S106 legal agreement.

(c) Impact on the Character and Appearance of the Cotswolds National Landscape

10.41 The application site is located within the Cotswolds National Landscape (CNL) (formerly known as the Cotswolds Area of Outstanding Natural Beauty (AONB)) wherein the Council, in performing or exercising any functions in relation to, or so as to affect, the area *'must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.'* (S85(A1) of the Countryside and Rights of Way Act 2000).

10.42 The following policies and guidance are considered applicable to this proposal:

10.43 Local Plan Policy EN1 Built, Natural and Historic Environment

New development will, where appropriate, promote the protection, conservation and enhancement of the historic and natural environment by:

a. Ensuring the protection and enhancement of existing natural and historic environmental assets and their settings in proportion with the significance of the asset;

b. Contributing to the provision of multi-functional green infrastructure;

c. Addressing climate change, habitat loss and fragmentation through creating new habitats and the better management of existing habitats;

d. Seeking to improve air, soil and water quality where feasible; and

e. Ensuring design standards that complement the character of the area and the sustainable use of the development.

10.44 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.

10.45 Local Plan Policy EN4 The Wider Natural and Historic Landscape

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.

10.46 Local Plan Policy EN5 Cotswolds Area of Outstanding Natural Beauty (AONB)

1. *In determining development proposals within the AONB or its setting, the conservation and enhancement of the natural beauty of the landscape, its character and special qualities will be given great weight.*

2. Major development will not be permitted within the AONB unless it satisfies the exceptions set out in National Policy and Guidance.

10.47 Local Plan Policy INF7: Green Infrastructure

1. *Development proposals must contribute, depending on their scale, use and location, to the protection and enhancement of existing Green Infrastructure and/or the delivery of new Green Infrastructure.*

2. New Green Infrastructure provision will be expected to link to the wider Green Infrastructure network of the District and beyond.

3. Green Infrastructure will be designed in accordance with principles set out in the Cotswold Design Code (Appendix D).

10.48 In terms of national guidance, Paragraph 187 of the NPPF states that planning policies and decisions should contribute to and enhance the natural and local environment by *'recognising the intrinsic character and beauty of the countryside'.*

10.49 Paragraph 189 of the NPPF states that *'great weight should be given to conserving and enhancing landscape and scenic beauty in ... National Landscapes which have the highest status of protection in relation to these issues.'*

10.50 It is noted that the consultation draft NPPF Policy N4 advises that *'substantial weight should be placed on the importance of conserving and enhancing the natural beauty...'* of National Landscapes. This differs from the great weight set out in the current NPPF.

10.51 Draft Policy N4: Protected Landscapes states:

' 1. Development proposals within Protected Landscapes should be limited in scale and extent and sensitively located and designed to avoid harm to their statutory purposes and special qualities. Substantial weight should be placed on the importance of conserving and enhancing the natural beauty of these areas, and to conserving and enhancing wildlife and cultural heritage in National Parks and the Broads.'

10.52 The Cotswolds National Landscape is classed as a Protected Landscape.

10.53 In addition to the above, the Council's Cabinet, at its meeting on the 8th May 2025, resolved to *' endorse the recommendation of the report that the Cotswolds National Landscape Management Plan 2025-2030 be used:*

- 'as a material consideration in the determination of planning applications (where compatible with relevant Local Plan and national policy)'

10.54 The Cotswolds National Landscape Management Plan 2025-2030 includes a number of policies which are considered applicable to this application, including:

10.55 Policy CE1. Landscape

CE1.1 Proposals that have the potential to impact on, or create change in, the landscape of the Cotswolds National Landscape (CNL), should be delivered in a way that is compatible with and seek to further the conservation and enhancement of the landscape character of the location, as described by the CNL Board's Landscape Character Assessment and Landscape Strategy and Guidelines. There should be a presumption against the loss of key characteristics identified in the landscape character assessment.

CE1.2 Proposals that have a potential impact on, or create change in, the landscape of the CNL, should seek to further the conservation and enhancement of the scenic quality of the location and its setting, views, including those into and out of the National Landscape and visual amenity.'

10.56 Policy CE4: Local distinctiveness

'CE4.1 Proposals that are likely to impact on the local distinctiveness of the Cotswolds National Landscape (CNL) should be delivered in a way that is compatible with and seek to further the conservation and enhancement of this local distinctiveness. This should include:

- being compatible with the CNL Board's Landscape Character Assessment, Landscape Strategy and Guidelines, Local Distinctiveness and Landscape Change and any relevant position statement or guidance published by the Board.

- being designed to respect local settlement patterns, building styles, scale and materials in accordance with design guidance prepared by local planning authorities;

- using an appropriate colour of Cotswold limestone to reflect local distinctiveness.'

10.57 Policy CE5: Tranquillity

' CE5.1 Proposals that have the potential to impact on the tranquillity of the Cotswolds National Landscape (CNL) should be delivered in a way that is compatible with and seek to further the conservation and enhancement of this tranquillity, by seeking to avoid and where avoiding is not possible, minimise noise and other aural and visual disturbance.

CE5.3 Proposals that have the potential to impact on the tranquillity of the CNL should have regard to - and be compatible with - the CNL Board's Tranquillity Position Statement.'

10.58 Policy CE6: Dark Skies

' CE6.1 Proposals that have the potential to impact on the dark skies of the Cotswolds National Landscape (CNL) should be delivered in a way that is compatible with and seek to further the conservation and enhancement of these dark skies, by seeking to avoid and where avoiding is not possible, minimise lighting.

CE6.2 Measures should be taken to increase the area of dark skies in the CNL by removing and, where removal is not possible or appropriate, reducing existing sources of lighting.

CE6.3 Proposals that have the potential to impact on the dark skies or dark landscapes of the CNL should have regard to and be compatible with:

- The National Landscapes Board's Dark Skies and Artificial Light Position Statement.
- Cotswolds National Landscape Technical Lighting Design Guidance
- Best practice standards and guidance, in particular, that published by the Institution of Lighting Professionals. '

10.59 The application site and its surroundings are classified in the Cotswolds Conservation Board's Landscape Character Assessment (LCA) as falling within Landscape Character Area 19D Vale of Evesham Fringe. This in turn falls within Landscape Character Type Unwooded Vale.

10.60 The LCA advises that the *'Development and expansion of settlements'* is a Local Force for change

10.61 The Potential Landscape Implications of such development can include:

- *'Intrusion of expanded settlement fringes into the landscape including within the setting of the AONB*
- *Degradation of views to, from and across the Pastoral Lowland Vale*
- *Impact or loss of views of key features such as church towers across the landscape.*
- *Erosion or loss of distinctive small linear and nucleated settlement patterns due to settlement growth and coalescence.*
- *Loss/dilution of organic growth patterns of settlements including the relationship between the historic core and adjacent historic fields, paddocks and closes*
- *Proliferation of suburban building styles, housing estate layout and materials and the introduction of ornamental garden plants and boundary features.*
- *Upgrading of minor roads and lanes associated with new development and the introduction of suburbanising features such as mini roundabouts, street lighting, Highway fencing, kerbs and traffic calming measures*
- *Increased traffic leading to increased damage to road verges and roadside hedges and walls and the creation of informal passing places*
- *Introduction and accumulation of lit areas and erosion of characteristically dark skies.*
- *Potential loss of archaeological remains and historic features.*
- *Loss of archaeological and historical features, field patterns and landscapes.*
- *Interruption, weakening or loss of the historic character of settlements and the historic context in how they have expanded, especially the importance of the relationship between the historic core of the settlement and surviving historic features such as churchyards, manor houses, burgage plots, historic farms, pre-enclosure paddocks and closes.'*

10.62 The LCA's Landscape Strategies and Guidelines advises:

- *' Maintain the open, sparsely settled character of the Unwooded Vale by limiting new development to existing settlements and avoiding development between existing villages.*
- *Avoid development that will intrude negatively into the landscape and cannot be successfully mitigated, for example, extensions to settlements in areas of open landscape*
- *Ensure that new development does not adversely affect the wider rural landscape and views to and from the AONB.*

- *Ensure new development is proportionate and does not overwhelm the existing development.*

- *Ensure that new development does not adversely affect settlement character and form or impact on views of key features such as church towers.*
- *Avoid ribbon development along major access or through routes*
- *Avoid developments incorporating standardised development layout, suburban style lighting, construction details and materials that cumulatively can lead to the erosion of peaceful landscape character.*
- *Layout of development should respect local built character and avoid cramming up to boundaries resulting in hard suburban style edge to the settlement.*
- *Control the proliferation of suburban building styles and materials*
- *Promote the use of local building materials and building styles in the construction of new buildings and extensions to existing dwellings. (New buildings should, at least, respect local vernacular style). Promote the conservation and/or encourage the restoration of existing buildings in preference to new built development particularly in rural areas.*
- *Conserve the existing dark skies and areas of dark landscape*
- *Adopt measures to minimise and where possible reduce light pollution*
- *Retain existing trees, dry stone walls, hedges etc as part of the scheme for green infrastructure and to reflect the former landscape, historic filed patterns etc.*
- *Ensure new development is visually integrated into its surroundings and does not interrupt the setting of existing settlements. Break up harsh edges of new development with appropriate and adequate tree planting ideally in advance of the development taking place.*
- *Retain hedgerow tress and seek opportunities to plant or tag new hedgerow trees*
- *Ensure the density of new development reflects its location relative to the 'core' of the settlement and its proximity to the surrounding rural landscape*
- *Avoid disconnecting the historic core of settlements from its rural surroundings particularly village Conservation Areas.*
- *Preserve archaeological and historical features and deposits and promote initiatives that remove heritage assets from at risk' status in the Heritage at Risk Register.*
- *Avoid proposals that result in the loss of archaeological and historical features or that impact on the relationship of the settlement and its links with surviving historical features.*
- *Consider the impact on local Public Rights of Way as settlements expand and take into account any required improvements*

- *Ensure development proposals safeguard and provide new links and enhancements to the Public Rights of Way network.'*

10.63 It is noted that the document entitled 'Study of land surrounding Key Settlements in Cotswold District: Update' October 2014 states the following in relation to SHELAA reference W_8B:

'LANDSCAPE SENSITIVITY:

Evaluation: Medium

Justification:

This site is susceptible to housing development by reason of its open character and land use, and by the presence of a PROW along part of its boundaries and lack of vegetated boundary to the west. It is intervisible with the scarp slope to the south and from Broadway Road/Leamington Road. It is of value being within the AONB. However, it is not of intrinsically high value, with good screening from the dismantled railway to the west and existing housing along its eastern boundary. If housing development is permitted here it should be of high quality and present a positive edge to the west, where it will be visible when approaching from Broadway.'

10.64 The aforementioned document is more open to development on the site than the 2021 SHELAA report which states:

'Unsuitable - The site is within the AONB and is exposed with clear views from the road and the hills to the south and the wider AONB. It is also viewed from the Public Right of Way to the north. It is a relatively flat field with a strong rural character at Willersey's eastern entrance. The field is in active agricultural use as animal pasture and has ridge and furrow.'

10.65 The application site occupies a smaller area of land than that identified in the SHELAA. It comprises a relatively flat and open agricultural field which is set to grass. It does not contain any landscape features of any particular note. In addition, it does not contain ridge and furrow as mentioned in the above report. As a consequence, the site appears distinct from the land to the north of the site which contains ridge and furrow, hedgerows and a number of trees. Notwithstanding this, the openness of the site affords views from the Public Right of Way (HWY9 which runs to the north of the site) to the escarpment to

the south, as well as contributing to the rural setting of the village and the character and appearance of the designated landscape.

10.66 The applicant has submitted a Landscape and Visual Impact Assessment (LVIA) with this application. The LVIA has assessed the impact of the development from a number of public vantage points in and around the settlement, including viewpoints from Public Rights of Way traversing the higher land to the south of the application site. With regard to visual effects, the LVIA states:

'In terms of visual effects, from publicly accessible locations, the vast majority of receptors within the Study Area would experience a negligible effect due to the visual containment of the Proposed Development and its well related nature to the existing edges of Willersey. This includes from the rising escarpment of the Cotswolds to the south of the Site. There will be a Major/Moderate adverse effect on Willersey Footpath 9 at Year 1 which passes in close proximity to the north of the Proposed Development. By Year 15 this is expected to reduce to Major/Moderate to Moderate adverse following semi-maturation of the landscape proposals and weathering of the residential development. Users of Broadway Footpath 523(C) would experience a minor adverse effect at Year 1 reducing to negligible by Year 15.'

10.67 With regard to landscape effects, the LVIA states:

'the overall landscape effects on the Site-specific landscape elements and features have been assessed as moderate adverse at Year 1 and Year 15 as a result of the Proposed Development. In terms of the wider LCA 19D: Value of Evesham Fringe, effects arising from a result of the Proposed Development were judged to be minor adverse. The nature of the Proposed Development is not uncharacteristic within the receiving landscape context, retaining and enhancing the limited features which are present, whilst also being of similar style, design and Cotswold vernacular to the Folly View development which bounds the Site to the south. The positive frontage interface of the northern and western edges of the Proposed Development mark an improvement upon the rear boundaries of development along Hays Close and Field Lane to the east of the Site as currently experienced along Willersey Footpath 9. The proposals represents a high-quality residential development and landscape enhancement over the existing baseline scenario that provides a sense of place.'

10.68 In response to the above comments, Officers concur that the proposed development would be most visible from Public Right of Way HWY9 which extends around the eastern and northern edges of the field lying to the north of the application site. The proposed development would be readily visible from

the aforementioned route, with an open area of grassland lying between the site and the future development. The rising hills of the Cotswolds escarpment are visible beyond the application site. Furthermore, Public Right of Way HW9 extends westwards into Worcestershire where it becomes Public Right of Way 523 (C), although the site can be viewed to a lesser degree from the aforementioned route. In terms of landscape and visual effects, Officers consider that the proposal would have a Major/Moderate adverse effect from Public Right of Way HWY9 and an initial minor adverse effect from Public Right of Way 523 (C). Notwithstanding this, it is noted that the site is viewed against a backdrop of existing post war housing, which already influences the experience of users of the Public Rights of Way. It is also noted that the application site does not directly abut the route of Public Right of Way HWY9. As a consequence, users of the aforementioned route would continue to experience a degree of openness along the route and views through to the escarpment to the south. The rising land to the south of the site would continue to be visible above the proposed housing and continue to provide a backdrop to built development. The rural character of the route would therefore be retained to a large extent.

10.69 In addition to the retention of the northern part of the existing field as agricultural land, the illustrative layout also indicates that the western part of the application site could be kept free from housing. It would therefore enable the creation of a transitional area between built development and the open countryside thereby softening the impact of development when viewed from the west. New housing would therefore relate closely to existing housing developments, helping to reduce the spread of development into the wider landscape.

10.70 With regard to views from other public vantage points, it is noted that views from the B4632 Broadway Road on the western approach into the settlement would largely be screened by the existing Folly View development. The proposal is therefore considered to have a negligible landscape and visual impact when viewed from the aforementioned location.

10.71 With regard to views from the network of Public Rights of Way that extend across the rising land to the south of the application site, it is noted that the site forms a minor part of a wider landscape view that incorporates both the village and the Vale of Evesham to the north. The proposed housing would sit alongside existing housing. In combination with the modest size of the application site, its close relationship to existing village development and the longer distance nature of the views, it is considered that the proposed housing

would have a negligible impact on the character and appearance of the CNL when viewed from the higher land to the south.

10.72 In addition to the above, it is also noted that Outline permission for 20 dwellings on the site of the existing Folly View development was allowed at appeal in 2015 (14/01739/OUT , APP/F1610/A/14/2227938). At the time, Folly View site was a greenfield site similar to the current application site. In considering the impact of development on the Cotswolds National Landscape, the Inspector stated:

'30. I am aware that views of the appeal site from the public right of way to the north would change in that it would introduce some built development into the foreground of views towards the Escarpment. However, the Escarpment would be the backdrop to the proposed new built development. The Escarpment would still be seen rising above the proposed houses and it would remain the dominant feature in the landscape when viewed from this public right of way.

31. The appeal site is often obscured by intervening landscaping and topography from many of the public rights of way crossing the slopes of the Escarpment to the south. However, I am also aware that there are some public views from parts of this higher land to the south. Where the new dwellings would be seen they would form a very small part of the much wider landscape including the Vale of Evesham and stretching onwards to the Malvern Hills. The appeal site is a small element of a much larger landscape view. It would be seen in the context of the built development immediately adjacent at Willersey. If no development were to occur at the appeal site the views of the appeal site already includes built development which is seen to the north. The proposal would be a very small addition of built development within a vast landscape. In my assessment there would be no adverse impact caused by the proposal when viewed from public viewpoints within the AONB to the south. In particular I note that the Council's Landscape Officer considers that the appeal proposal can be accommodated within the appeal site without having a significant adverse landscape impact.

32. Clearly, the development would lead to the loss of a field but that field does not have within it any features that are special to the character of this part of the AONB.

33. I therefore conclude, for the reasons explained above, that the proposal would not harm the character or appearance of that part of the AONB within which it would be situated or the surrounding area.'

10.73 The Folly View development occupies a more prominent roadside position than the current application site. It also involved a far greater and more noticeable extension of built development into the countryside than the current proposal. Notwithstanding this, it was deemed to be acceptable by the Planning Inspector. It is noted that this proposal would add to the westwards extension of the settlement. However, given the modest size of the site, its close relationship to existing village development and the limited impact of the scheme on the wider landscape, it is considered that overall landscape and visual impact would be very localised. It is therefore considered not to cause an overall level of harm that would be to detriment of the character and appearance of the CNL.

10.74 The Council has engaged a Landscape consultant to undertake an independent assessment of the proposal and the documents submitted in connection with this application. The Landscape consultant initially requested further clarification about a number of points, such as the assessment of landscape sensitivity and landscape/visual receptors. The applicant has provided further information to address these matters. The Landscape consultant has reviewed the addition information and states:

10.74.1 'In summary, the proposed development would give rise to a degree of adverse effect on landscape character and visual amenity, particularly in the early years following implementation. These effects are acknowledged to be mitigated through the proposed landscape strategy and would be expected to reduce over time as planting establishes and matures.

10.74.2 If minded for approval, it is recommended that conditions are imposed to ensure that the landscape and visual effects are appropriately managed and mitigated. These should secure a landscape-led approach that reflects the site's sensitivity.'

10.75 The conditions referred to in the above response relate to landscaping, building material details, external lighting and the submission of a Landscape and Ecological Management Plan (LEMP). As this application is an Outline application, matters relating to landscaping, materials and lighting would be addressed at the Reserved Matters stage should permission be granted. A Public Open Space, green infrastructure management condition is proposed as part of this recommendation, which would cover the future management of green spaces. A 30 year Habitat Monitoring and Management Plan is also proposed which could the future management of biodiversity habitats. In summary, the Landscape consultant considers that the landscape and visual

effects of the development can be satisfactorily mitigated and no objection is raised.

10.76 In light of the residential nature of the development and its location adjacent to an existing Principal Settlement, it is considered that the proposed scheme would not have an adverse impact on the tranquillity of the CNL. In addition, it is also considered that the proposal would not have an adverse impact on dark skies given the overall size of the development and its proximity to existing housing.

10.77 With regard to the duty to *'further the purpose of conserving and enhancing the natural beauty'* of the CNL, it is evident that the character and appearance of the designated landscape is not just defined by open countryside but also by the setting of buildings and settlements within the landscape and the manner in which they relate to it. The village of Willersey sits within the CNL and therefore contributes to its character and appearance. The proposed development would be seen in context with the existing settlement and, by virtue of its modest size in relation to the settlement as a whole, its relatively discreet position, the green infrastructure that could be incorporated into the development and the indicative design approach that would respect traditional building forms, it is considered that the development could be undertaken in a manner that respects the setting of the settlement within the designated landscape and the character and appearance of the CNL. New landscaping and a sensitive design approach (as has occurred at Folly View to the south) would also ensure that development responds sympathetically to its location. In this regard, it is considered that the proposal reasonably addresses the requirement to further the purpose of conserving and enhancing the natural beauty of the CNL.

10.78 With regard to the potential coalescence of the village of Willersey with existing housing in Wychavon District to the west, the Planning Inspector made the following comments in relation to the proposal to develop the site of the existing Folly View development in 2015:

'18. I do not share the Council's concerns that the gap between Willersey and the Wychavon Housing is particularly important. The gap that would remain would be sufficient to show that the Wychavon Housing was separate from, and did not form part of, the housing in Willersey. I have explained that character and appearance of the Wychavon Housing does not reflect the Cotswold vernacular. The appeal proposal provides an excellent opportunity of building housing at the entrance to Willersey which could reflect that which was typical of this part of the Cotswolds. In so doing this would emphasise the difference

between the Wychavon Housing and the settlement of Willersey to the benefit of the area.

19. There is no evidence before me that the proposal would diminish the separate identities of Willersey or Broadway. The fact that the gap between the Wychavon Housing and Willersey would be reduced would not impact on the identities of either Willersey or Broadway. Neither do I agree that the proposal would lead to the coalescence of Willersey and Broadway as suggested by the Council.'

10.79 The current proposal would not extend development beyond the western edge of the existing Folly View development. It is considered that it would not result in the coalescence of Willersey with the housing development in Wychavon District to the west.

10.80 With regard to dark skies, the application site is located adjacent to existing residential housing estates. The proposed scheme would not therefore appear as an isolated or distinct form of development within the landscape. It would be located alongside development where street lights and household illumination are evident. Having regard to the modest size of the application site, the limited extent of estate roads (which would limit the amount of street lights that would be required) and its relationship to existing village development, it is considered that the proposed development would not have an adverse impact on dark skies, having regard to Cotswolds National Management Plan Policy CE6 or paragraph 198c of the NPPF, which seeks to *'limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.'* Conditions are proposed which would require the approval of lighting schemes that minimise the impact of light pollution on dark skies and on the CNL.

10.81 With regard to tranquillity, the proposed scheme seeks permission for residential development adjacent to existing residential development. The proposed use is considered not to represent a form of development that would be likely to generate a level of noise or disturbance that would an adverse impact on the tranquillity of this part of the CNL. The proposed use is consistent with existing development in this location and is considered to be acceptable in its context. The proposal is considered not to conflict with Cotswolds National Management Plan Policy CE5 in this respect.

10.82 It is considered that the proposed development can be undertaken without having an unacceptable adverse impact on the character or appearance of the Cotswolds National Landscape or the rural setting of the village. The proposal

is considered to accord with Local Plan Policies EN1, EN4 and EN4, Section 15 of the NPPF, Policy N4 of the draft NPPF and the policies in the Cotswolds National Landscape Management Plan.

Major Development in the Cotswolds National Landscape

10.83 In determining this application, it is necessary to assess whether the proposal constitutes major development for the purposes of paragraph 190 of the NPPF. This is distinct from the categorisation of major development set out in the Town and Country Planning (Development Management Procedure) (England) Order 2015, which is based solely on the size of a development. With regard to paragraph 190, footnote 67 of the NPPF states that whether a proposal is *'major development' is a matter for the decision maker, taking into account its nature, scale and setting and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.'*

10.84 Paragraph 190 states:

'planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such an application should include an assessment of:

i) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;

ii) the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and

iii) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that can be moderated'.

10.85 The above criteria are repeated in draft NPPF Policy N4.

10.86 In the case of this proposal, the submitted scheme is for 30 dwellings adjacent to a Principal Settlement. The proposed number of dwellings is therefore considered to be relatively modest when assessed in the context of the settlement as a whole. The proposed residential use is also compatible with existing adjacent development and is not therefore out of character with the area. Whilst the scheme would result in the development of a greenfield site within the CNL, the area in question is modest in size and seen in context with

existing built development. In addition, the landscape and visual impact of the scheme is considered to be localised. The proposal would not generate significant levels of traffic or noise, disturbance or light pollution that would be harmful to the CNL. When assessed against the requirements of Footnote 67 of the NPPF, it is considered not to have a significant adverse impact on the purposes for which the area has been designated. The comments of the Cotswolds National Landscape Board are noted. However, for the reasons stated, it is considered that the proposal does not constitute major development in the CNL in this instance.

10.87 It is noted that the 2016 appeal decision relating to the erection of 71 dwellings on land off Collin Lane to the north of the current application site determined that the appeal scheme would constitute major development within the CNL. However, the development of 30 dwellings at Folly View to the south has been considered previously not to represent major development. In the case of the appeal scheme, it is noted that the proposal was for a greater number of dwellings than the current scheme, it was located on a more prominent roadside site and on a site that exhibited a number of attractive features such as ridge and furrow, trees and hedgerows. In contrast, the current application site has a stronger physical and visual connection with the land on which the Folly View development was erected. It is considered that the current proposal does not constitute major development for the purposes of paragraph 190 of the NPPF.

(d) Access and Highway Safety

10.88 The proposed development would be served by a new vehicular/pedestrian entrance to the south of the application site and by a pedestrian entrance located in its north-eastern corner. The proposed vehicular/pedestrian entrance would extend through an existing grassed area located in the eastern part of the Folly View residential development to the south of the site. It is proposed to create a new roadway/footway from the application field to the existing estate road serving Folly View. The new roadway would measure approximately 50m in length and would join on to the aforementioned estate road at a point approximately 60m to the north of the B4632 Broadway Road.

10.89 In addition to the proposed new vehicular access, it is also proposed to create a new pedestrian entrance in the north-eastern corner of the application site. The proposed entrance would connect with an existing Public Right of Way which extends around the eastern and northern boundaries of the field lying to the north of the application site. The existing Public Right of Way links into Hays

Close and Collin Close to the north-east of the application site, through which it is possible to reach the centre of the village.

10.90 The following policies and guidance are considered applicable to this proposal:

10.91 Local Plan Policy INF4 Highway Safety

'Development will be permitted that:

a. Is well integrated with the existing transport network within and beyond the development itself, avoiding severance of communities as a result of measures to accommodate increased levels of traffic on the highway network;

b. Creates safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoids street clutter and where appropriate establishes home zones;

c. Provides safe and suitable access and includes designs, where appropriate, that incorporate low speeds;

d. Avoids locations where the cumulative impact on congestion or other undesirable impact on the transport network is likely to remain severe following mitigation; and

e. Has regard , where appropriate, to the Manual for Gloucestershire Streets or any guidance produced by the Local Highway Authority that may supersede it.'

10.92 In addition, criteria 1 a and b of Local Plan Policy INF3: Sustainable Transport states that development will be permitted where it:

a. actively supports travel choice through provision, enhancement and promotion of safe and recognisable connections to existing walking, cycling and public transport networks ...;

b. gives priority to pedestrians and cyclists and provides access to public transport facilities taking account of the travel and transport needs of all people.'

10.93 Paragraph 116 of the NPPF states *'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network,*

following mitigation, would be severe, taking into account all reasonable future scenarios.'

10.94 Draft NPPF Policy TR6:3 states that *'all development proposals should be capable of proceeding without having a severe adverse impact on the transport network (in terms of capacity and congestion, including cumulative impacts), or a unacceptable impact on highway safety, taking into account any mitigation measures proposed as well as any wider network improvements.'*

10.95 This application is accompanied by a Transport Statement (TS) which includes information relating to matters such as vehicle speeds, traffic generation, access visibility, accessibility, pedestrian/cycle movements and highway safety.

10.96 With regard to vehicle speeds along the B4632 Broadway Road, the TS includes the results of seven day Automated Traffic Counts (ATCs) that were undertaken in February 2025. The ATCs recorded 85th percentile speeds of 31.5mph north-eastbound and 34.7mph south-westbound. The speed limit for the section of road passing the Folly View junction with the B4632 is 40mph. The respective speed limit drops to 30mph at a point approximately 15-20m to the north-east of the aforementioned junction. Within the Folly View development itself, a road sign on a lamp post specifies a 30mph limit.

10.97 The proposed development would utilise the existing Folly View junction with the B4632. The existing junction has visibility of approximately 2.4m by 120m to the south-west and 2.4m by 62m to the north-east. It can therefore provide adequate visibility in both directions for vehicles entering the B4632. In addition, the Folly View estate road is wide enough to accommodate 2 way traffic. It is therefore considered that the existing junction arrangements are suitable for the level of development that is being proposed.

10.98 With regard to the creation of an entrance road from the existing field onto Folly View, it is also considered that the proposed access road and junction arrangement are suitable and capable of safely accommodating vehicle traffic arising from the proposed development. The proposed junction with Folly View can provide adequate visibility and the new carriageway will be 5.5m in width, which is capable of accommodating passing traffic. The TS includes a swept path analysis plan which demonstrates that the proposed access road can accommodate larger service vehicles, such as a refuse vehicle.

10.99 With regard to traffic generation, the TS predicts a total of 17 two way vehicle movements in the AM peak period (0800-0900) and 18 two way vehicle movements in the PM peak period (1700-1800). The Folly View junction

connects with a B road, which in turn joins the A44 approximately 550m to the west of the aforementioned junction. Traffic will therefore join a network of B and A roads which have capacity to accommodate the additional traffic flows generated by the proposed development. It is considered that the level of traffic generated by the proposed development would not have a material impact on the operation of the local highway network, and would not be severe in the context of paragraph 116 of the NPPF. In terms of cumulative impact, it is noted that the TS submitted in connection with the proposed 60 dwelling scheme on the north-eastern side of the village predicts that the respective development would generate a total of 28 vehicular trips during the AM peak period and 26 vehicular trips during the PM peak period. It is considered that the combined level of traffic generated by the 2 developments would not be at a level that would have an adverse impact on highway safety or have a severe impact on the local road network.

10.100 In terms of pedestrian and cycle connectivity, it is considered that the site affords safe and reasonable access to existing services and facilities in the village for such users. Bus stops are also within reasonable walking distance of the site. Gloucestershire County Council Public Rights of Way are broadly supportive of a connection into the existing Public Right of Way adjacent to the north-eastern corner of the application site. It is considered that the site offers access to a range of services and facilities by means other than the private motor car and is consistent with Local Plan Policy INF3 in this respect.

10.101 With regard to car parking, it is considered that the application site has sufficient space to accommodate adequate on-site parking to meet the future needs of the development. The final layout and number of parking spaces would be established at the Reserved Matters stage should Outline planning permission be granted for this development. It is noted that the proposed access road would cut across part of an existing hardstanding which is used currently for the parking of vehicles in the Folly View development. At present, the area provides space for 6 tandem parking spaces. However, it is noted that the approved plans for the Folly View development show 3 allocated spaces in the area in question. The current proposal would not result in the loss of the aforementioned approved spaces and would not therefore reduce parking to a level below that which has been deemed previously to be acceptable. In addition, the parking spaces serve 2 bed dwellings rather than larger family homes and as such would typically generate a lesser parking demand. Whilst the current proposal may lead to an increase in on-street parking compared to the existing situation, there are no parking restrictions along the existing estate road and the road is of a design and width which can accommodate on-street parking. The potential for displacement parking is considered not to be at a

level that would have an adverse impact on highway safety or the operation of the existing estate road.

10.102 Gloucestershire Count Council Highways raises no objection to the application.

10.103 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.

(e) Flooding and Drainage

10.104 The application site is located in Flood Zone 1, which is the lowest designation of flood zone and one in which new residential development can be acceptable in principle.

10.105 This application is accompanied by a Flood Risk Assessment and Drainage Strategy has assessed the susceptibility of the site to flooding. With regard to the Risk of Flooding from Surface Water (RoFSW), the aforementioned report states that *'The RoFSW dataset shows the majority of the site has a very low yearly chance of flooding. This is consistent between the present-day mapping and the future flood risk projections. There is a low to high risk surface water flow route within the east of the site associated with the existing ditch.'* It goes on to state that the *'the site is not located within an area assigned a groundwater flooding susceptibility class,'* and that *'shallow groundwater was encountered during the infiltration testing.'*

10.106 In terms of a drainage strategy, the submitted report states:

'Infiltration is deemed unsuitable following onsite testing, and so surface water runoff generated by the development would be attenuated using lined cellular storage tanks across the site, lined permeable paving, and a basin. Flows would be discharged to the ditch to the north of the site and restricted to QBAR for all events up to and including the 1 in 100 year plus 40% climate change storm, to provide betterment compared to the existing free-flowing scenario.' It also states that *'There is a ditch located along the eastern boundary, as well as to the north of the site. As the site levels currently fall towards the north, surface water runoff from the existing site would naturally flow to the ditch to the north of the site. It is therefore proposed that surface water generated by the development would be attenuated on site prior to being discharged to the northern ditch.'* Other measures such as rainwater harvesting, permeable

paving, swales and filter drains could be incorporated into a final detailed design.

10.107 The submitted details and recommendations have been assessed by Gloucestershire County Council Lead Local Flood Authority (LLFA), which has requested additional information. It states:
' Flood Risk

10.107.1 As shown in the Flood Risk Assessment and Drainage Strategy (P24-3059; September 2025) (FRA) The site is in flood zone 1 and mostly at very low risk according to the Risk of Flooding from Surface Water (RoFSW) maps. However, there is an area at medium and high risk along the eastern boundary in which, according to the masterplan, there will be properties situated. This could either put these properties at risk or displace the flood water an increasing the risk elsewhere, if not mitigated. No modelling has been carried out as it is being proposed to do so before a reserved matters application if the application is approved.

10.107.2 It should be noted that modelling of the watercourse was carried out to support a previous application (20/04553/OUT) and shows that the site might be at higher risk than the RoFSW maps show and the impact over a wider area of the site. This should be addressed in this application.

Surface Water Management

Runoff Destination

10.107.3 The geology of the site is Charmouth Mudstone, which is not conducive for infiltration. Instead, it is proposed to discharge surface water to a watercourse to the northwest of the site. This watercourse is not mapped, the LLFA has no information on it and none has been provided with the FRA. According to the topographic survey and the LiDAR information the LLFA has, the site appears to fall and therefore drain to the northeast rather than towards the watercourse identified. It will also require extensive work outside of the redline boundary and may require approval from third party land. For these reasons, further information should be provided.

10.107.4 It should also be noted that the National Standards for Sustainable Drainage Systems state that when discharging to a surface water body, the outfall should be a vegetated channel or reuse an existing outfall rather than building a new engineered outfall in the watercourse.

Discharge rate and volume

10.107.5 The proposed discharge rate is 3.6 l/s, which is approximately equal to the greenfield runoff rate for QBar and which will help manage runoff volume.

Sustainable Drainage System (SuDS) strategy and indicative plan

10.107.6 SuDS will be incorporated into the drainage strategy with an attenuation basin, underground cellular storage and permeable paving being provided. While it's been shown that the strategy can accommodate a 1% Annual Exceedance Probability (AEP) rainfall event plus 40% for climate change (Standard 3 of the National Standards) it hasn't been shown that it will meet Standard 2 (managing the first 5mm of rainfall for the majority of events without producing runoff).

10.107.7 Underground cellular storage is not mentioned in the National Standards and their use is not considered sustainable given it's onerous maintenance requirements and the inability to easily check if it is functioning. They should be replaced with more above ground features that can provide multiple benefits to the development.

10.107.8 The areas draining through the permeable paving and then the attenuation basin will be part of a SuDS treatment train to manage water quality, however, the remaining hardstanding area will not be. This is particularly pertinent for the access road, which could introduce hydrocarbons and sediments to the surface water.

10.107.9 The masterplan does show swales around the site but these haven't been incorporated into the SuDS Strategy.

Climate change

10.107.10 Climate change has been included at a value of 40%, which is in line with the Environment Agency's estimates.

Exceedance flow plan

10.107.11 A plan showing where surface water will flow through and off the site in events that exceed the design of the drainage have not been included but will depend on the final topography of the site.

LLFA Recommendation

10.107.12 More information should be provided to demonstrate the site would not be at undue risk of flooding and won't increase the risk elsewhere. Furthermore, more information should be provided on the runoff destination and it should be demonstrated that the strategy can meet the National Standards for SuDS, as described above.'

10.108 The applicant is currently in discussions with the LLFA about the matters raised. It is anticipated that additional information will be available prior to the Committee meeting. It is also considered that the matters raised are ones that can be reasonably addressed. Subject to no objection from the LLFA and the attachment of any conditions that it recommends, it is considered that the scheme could be undertaken in accordance with Local Plan Policy EN14 and Section 15 of the NPPF. Without the agreement of the LLFA it is considered that the proposed scheme would be unacceptable on surface water grounds.

10.109 With regard to foul drainage, the applicant proposes to connect the development to the existing Severn Trent Water network. The submitted drainage report states *' There is a public foul sewer within the site boundary; the 150 millimetre (mm) pipe enters the site from Folly View to the south and conveys flows towards the south-eastern corner, and then in a north-western direction along the eastern site boundary. The sewer exits the site via an existing path which connects to Hays Close to the north-east.'*

10.110 A large number of concerns have been raised by local residents and the parish council in relation to the capacity in existing foul drainage infrastructure in the village. The parish council states:

'The system, which operates as a single pipe system, is at maximum capacity, resulting in frequent and severe sewage spills. Flooding has become a regular occurrence, sometimes up to five times a year, especially during prolonged heavy rain. This affects Collin Lane, Blind Lane, and Badsey Road (under the railway bridge). Crucially, raw sewage, which has been seen floating along Collin Lane and into the stream alongside the Recreation Ground/Willow Green (ultimately feeding into Badsey Brook and the River Avon), is being discharged into floodwaters and the gardens of Collin Lane, posing a severe public health risk. This contamination causes the backup of sewage systems for properties on Collin Lane, Collin Close, and others, stopping the use of toilets and showers until the floodwaters subside.'

10.111 The relevant body for dealing with foul water in the site area is Severn Trent Water (STW). It is has been made aware of the issues currently experienced by local residents. However, under the requirements of the Water Industry Act 1991, STW has a statutory duty to connect residential development to its network. It is therefore responsible for ensuring that its infrastructure has capacity to accommodate new development. The means of connection to the network would ultimately be a matter between the developer and STW. In its formal response to this application, STW states;

10.111.1 ' Severn Trent has concerns regarding the impact the additional flow that this proposed development will generate, we have been contacted by a number of residents about flooding in the area and we are still completing investigations into the issues. However, no investment is currently confirmed and consequently we cannot object to approval being granted.

10.111.2 Under current legislation a developer has the right to connect to the public foul network to drain foul water, and to do so at the nearest or most convenient point on the existing network. In addition to this right, Severn Trent has a statutory duty to provide any network reinforcement that may be required to accommodate the flow generated by such a new development.

10.111.3 With a view to better understanding how our network is operating Severn Trent is undertaking a number of investigations. Once these investigations are completed, if improvements are deemed necessary, these will be undertaken in accordance with our investment plans.

10.111.4 Unfortunately, we are not yet able to say with any certainty what may need to be done or when any necessary works may be completed.

10.111.5 In light of the above, given Severn Trent is unable to object to this proposal, we would request that any approval granted by yourselves should be conditioned as follows:

- *The development hereby permitted should not commence until drainage plans for the disposal of foul and surface water flows have been submitted to and approved by the Local Planning Authority, and*

- *The scheme shall be implemented in accordance with the approved details before the development is first brought into use.*

- *Planning Practice Guidance and section H of the Building Regulations 2010 detail surface water disposal hierarchy. The disposal of surface water by*

means of soakaways should be considered as the primary method. If this is not practical and there is no watercourse available as an alternative, other sustainable methods should also be explored. If these are found unsuitable satisfactory evidence will need to be submitted before a discharge to the public sewerage system is considered. No surface water to enter the foul or combined water systems by any means.

10.111.6 Reason To ensure that the development is provided with a satisfactory means of drainage as well as reduce the risk of creating or exacerbating a flooding problem and to minimise the risk of pollution.'

10.112 In addition to the above, it is noted that the issue of foul drainage capacity was covered as part of an appeal relating to the erection of 25 dwellings at Drakes Broughton near Pershore in Worcestershire in January 2025 (APP/H1840/W/24/3345732). The appeal decision related to an area covered by STW, which is the same body responsible for dealing with foul water in Willersey.

10.113 Paragraph 12 of the appeal decision states:

'12. The Council identifies that the village suffers from blocked and overflowing drains. This matter has also been raised by many local residents and the local MP who have reported that the existing sewers cannot cope during high rainfall leading to overflow of raw sewerage onto local roads. These comments raise concern by interested parties that these problems would be exacerbated by the proposal putting greater pressure on the sewer within the local area. However, as statutory undertaker STW has a duty to accommodate demand for the disposal of foul water. The development would increase the use of the sewerage system, albeit to a modest extent. However, the responsibility lies with STW rather than the developer to maintain and, where necessary, increase capacity. Therefore, where foul water has overflowed onto roads and properties, although regrettable, this does not provide a robust reason to refuse a proposal.'

10.114 In the case of the above appeal, the Planning Inspector considered the scheme to be acceptable in drainage terms subject to a condition requiring *'details of foul drainage to be submitted and approved by the local planning authority prior to the commencement of development. This could include the requirement for the appellant to demonstrate that where a connection to the public sewer is proposed that the additional foul sewerage can be accommodated within the existing system without increasing the risk of flooding or backing up of the existing system on site or elsewhere. Such a*

condition would be reasonable and ensure that the scheme manages its foul drainage requirements properly, without materially impacting on the existing off-site drainage issues raised by interested parties.' The aforementioned condition was more onerous than the condition recommended by STW, which required details to be agreed prior to first occupation of the development.

10.115 In light of the concerns raised by local residents and the findings of the Planning Inspector in relation to the aforementioned appeal, it is recommended that the following condition (based on the condition used in the above mentioned appeal) is attached to a decision should permission be granted for this scheme:

'Prior to the commencement of development, a foul water drainage scheme shall be submitted to and approved in writing by the Local Planning Authority.

The drainage scheme shall:

i) Include the design of all on and off-site foul sewerage infrastructure, the diameters of proposed pipes and the capacity of any on or off-site storage;

ii) Include a timetable and programme for the provision of the foul sewerage infrastructure; and

iii) Demonstrate that, where connection to a public sewer is proposed, the additional foul sewerage discharge can be accommodated within the public sewer system without increasing the risk of flooding or backing up of the existing system on the site or elsewhere. The development shall be carried out in accordance with the approved details and the approved timetable and programme.

Reason: *In order to ensure that the development hereby permitted is provided with a satisfactory means of foul drainage as well as reducing the risk of creating or exacerbating a flooding problem and to minimise the risk of pollution in accordance with Local Plan Policies EN14 and EN15. It is important that these details are agreed prior to the commencement of development in order to ensure that the proposal will not have an adverse impact on foul drainage and to ensure that adequate infrastructure can be provided.'*

10.116 The aforementioned condition would require the developer to ensure that foul drainage infrastructure has capacity to accommodate the proposed development. This would ensure that the development would not place additional pressure on the existing infrastructure and address the requirements of Local Plan Policy INF8: Water Management Infrastructure which states that

proposals will be permitted that *' takes account of the capacity of existing off-site water and wastewater infrastructure and the impact of development on it, and make satisfactory provision for improvement where a need is identified that is related to the proposal.'*

10.117 In reaching this conclusion, Officers have also had regard to Paragraph 201 of the NPPF which states:

' 201. The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities.

10.118 It is considered that measures can be put in place to ensure that the proposed development would not exacerbate the existing foul drainage issues encountered by local residents.

10.119 Subject to no objection from the LLFA in relation to surface water drainage matters, it is considered that the proposed development can be undertaken in accordance with Local Plan Policies EN14, EN15 and INF8 and Section 14 of the NPPF.

(f) Impact on Residential Amenity

10.120 The submitted layout plan demonstrates that the application site can accommodate 30 dwellings in a manner that would enable the provision of adequate outdoor amenity space. In addition, there is sufficient space within the site to accommodate dwellings that meet minimum floorspace standards as required by Local Plan Policy H1. Furthermore, it is considered that the proposed dwellings could be positioned and orientated in a manner that would avoid harm in relation to privacy, light and overbearing impact. The application is considered to accord with the Cotswold Design Code in these respects.

10.121 It is noted that 11 of the existing 30 dwellings on the Folly View development, which were permitted under 16/04902/FUL, provide over 55's accommodation. The respective dwellings are located in the western/north-western part of the respective development. It is considered that the submitted illustrative layout plan demonstrates that new dwellings can be positioned a sufficient distance from existing dwellings so as to prevent unacceptable harm to existing

residents. The proposed residential use is also considered to represent a form of development that would not cause an unacceptable level of noise, disturbance or pollution to occupants of the over 55's accommodation. Noise and disturbance arising during the construction phase of the development can be mitigated by an operating hours restriction which would form part of a Construction Management Plan condition.

10.122 The submitted plans set aside an area in the western part of the application site for a children's play area. The indicative layout also shows that the site can accommodate public open space and green infrastructure for the benefit of all future occupiers.

10.123 The proposed site entrance drive would extend across an existing grassed area which is located to the front (east) of 4 dwellings on Folly View (Nos 15-18). It would also be located to the front (north) of 19 and 20 Folly View which are located to the south of the proposed entrance drive. A private drive and a shared parking area currently lie between the front of the aforementioned 2 dwellings and the grassed area. The proposed entrance drive would provide the sole means of access and egress to and from the application site. The proposed access arrangements would result in a material increase in vehicle movements to the front of Nos 15 -20 Folly View. It would also result in additional movements along the stretch of the existing Folly View estate road which connects with the B4632. Notwithstanding this, it is noted that the existing Folly View development comprises 30 dwellings. There is therefore already a precedent for a similar level of traffic to that generated by the proposed development passing in close proximity to existing dwellings on Folly View. In the case of the current proposal, the traffic arising from this scheme would not pass the majority of dwellings on Folly View. The main impact would be on dwellings located in the eastern part of the aforementioned estate. In the case of Nos 15-20, the aforementioned dwellings are not subject to traffic passing their front elevations at the present time. Whilst the proposed development would introduce vehicle movements to the front of the respective properties, the level of passing traffic would not be materially different to that already experienced by other properties on Folly View. With regard to the impact of additional traffic on properties fronting onto the main Folly View estate road, it is noted that the proposal will increase vehicle movements along the road. However, the increase is considered not to be of a level that would cause an unacceptable level of noise, disturbance and pollution to the occupiers of the properties in question. It is also noted that a number of existing dwellings front onto the B4632 Broadway Road which is subject to far higher numbers of vehicle movements than would arise from the proposed development. On balance, it is therefore considered that the proposed access arrangements could

be put in place and operated without causing an unacceptable level of harm to existing residents having regard to Local Plan Policy EN15 and paragraph 198 of the NPPF.

10.124 The existing grassed area which would be developed for the new access road is not subject to any condition or agreement securing its use as Public Open Space. Access to the area could therefore be restricted at the present time.

10.125 With regard to designing out crime, the final layout and design of the scheme would be addressed at the Reserved Matters stage and would have regard to comments from Gloucestershire Constabulary. However, it is considered that there is reasonable scope to arrive at a scheme which would reasonably prevent crime and disorder and address the requirements set out in Section 17 of the Crime and Disorder Act 1998 which states that *'it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent,*

(a)crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment); and

(b)the misuse of drugs, alcohol and other substances in its area; and

(c)re-offending in its area; and

(d)serious violence in its area.'

10.126 It is considered that the proposal accords with guidance in the Cotswold Design Code.

(g) Biodiversity

10.127 This application is accompanied by an Ecological Appraisal (EA) Report. There are no European, national or local nature conservation designations covering the application site and the site does not contain UK Priority Habitat. The application filed comprises species-poor improved grassland. With regard to the site boundaries and its surroundings, the EA report states:

10.127.1 'The northern boundary and most of the western boundary of the application site is a continuation of the grazed, improved grassland. The southern end of the western boundary is delineated by post & wire fencing behind which is a short row of planted trees including oak (Quercus robur), field

maple (Acer campestre), hawthorn (Crataegus monogyna), silver birch (Betula pendula), hazel (Corylus avellana) and cherry plum (Prunus sp) - all trees are located outside the application site boundary.

10.127.2 The southern boundary of the application site is delineated by post & wire or post & rail fencing dividing the application site field from residential properties and gardens associated with Folly View. At the western end is a row of four Lawson cypress (Chamaecyparis lawsoniana) while at the eastern end are four oak trees, a small cherry plum and a large crack willow (Salix fragilis), which is located behind the ditch - all trees are located outside the application site boundary.

10.127.3 Along the fence are a number of small, scattered field maple and silver birch trees, which are set back in Folly View, with small patches of bramble (Rubus fruticosus agg) along the fence - all trees apart from one small field maple tree are located outside the application site boundary.

10.127.4 At the location where the proposed new access road will enter the application site development is a small length of recently established hedge comprising hawthorn, field maple, hornbeam (Carpinus betulus) and blackthorn (Prunus spinosa).

10.127.5 The eastern boundary of the application site is delineated by post & wire or post & rail fencing dividing the application site field from residential properties and gardens associated with Field Lane. Along the fence line is a mix of ornamental garden beech (Fagus sylvatica) and hornbeam (Carpinus betulus) hedge and bramble (Rubus fruticosus agg).'

10.128 The aforementioned report also states :

10.128.1 'There are short lengths of field drainage ditches located along and outside of the eastern boundary of the application site as well as to the north of the development site associated with the track along the northeast boundary of the wider field. These ditches are small (1m wide by 2m deep) and ephemeral being dry / damp at the time of the surveys that supports no aquatic / emergent vegetation.'

and

10.128.2 'The habitat directly affected by the proposed scheme is of very low ecological value being sheep-grazed, improved grassland (UK Habitat: Modified

Grassland). All plants recorded are common/widespread species, and no notifiable invasive plant species were recorded on site.

10.128.3 A main badger sett is located within a group of trees located outside the south-west corner boundary of the application site.'

10.129 In response to the submitted report, the Biodiversity Officer made the following initial comments:

10.129.1 'Habitats - The ecological report states that all boundary habitats to be retained will be safeguarded from damage and root compaction during construction. Section 7.1.1 of the report contains recommendations to safeguard these habitats. Although these recommendations are largely considered to be sufficient, it is felt that the details of exclusion buffers and protective fencing need to be specified within this section of the report so that the recommendations can be accurately complied with.

10.129.2 Bats - I agree with the assessments and conclusions of the ecological report pertaining to roosting and foraging and commuting bats. Given the nature of the habitats on site and the level of assessment which has been undertaken, it is felt in this instance that no further bat survey work is necessary.

10.129.3 Badgers - A main badger sett was recorded within a group of trees outside of the red line boundary area to the southwest. Other evidence of badger activity in the form of fresh digging, a dung pit and a latrine was also recorded during the survey. The ecological report states that the evidence shows that badgers migrate and forage along the field edges.

10.129.4 Section 6.4 outlines working methods to protect badgers, which include a 30m exclusion and buffer zone and restrictions to working during daylight hours. Section 7.1.2 provides recommendations to safeguard badgers in the form of Reasonable Avoidance Measures (RAMs); some of these recommendations contain the word 'should'. Although these RAMs are largely appropriate, the wording of recommendations containing 'should' needs to be amended to use words like 'will' or 'must' in order to make these recommendations definitive and fully enforceable.

10.129.5 Additionally, the report states that the 30m exclusion zone around the badger sett will not contain any deep excavation. The illustrative site masterplan (drawing no. 220 rev J) appears to show some construction for plot 1 will take place within this 30m exclusion zone. Can the ecologist please confirm that this

construction required for plot 1 will not involve any activities or works which are likely to damage the badger sett?

10.129.6 Birds - In consideration of the on-site habitats present which are to be lost and/or impacted by the proposed development, the assessment and recommendations for birds are felt to be sufficient. The creation of additional boundary habitats such as hedgerows and trees is likely to provide an overall benefit for local bird populations, especially passerine species

10.129.7 Amphibians - I agree with the assessments pertaining to Great Crested Newts and other amphibians. No further survey work is considered necessary in this instance.

10.129.8 Reptiles - I agree with the assessments pertaining to reptiles, and no further survey work is considered necessary in this instance.

10.129.9 Other species - Hedgehogs have been identified as potentially present within the ecological report, and the recommendations contained within section 7.1.3 of the report are considered to be sufficient to safeguard this species.

10.129.10 Enhancements for biodiversity - The ecological report recommends that holes in fencing for hedgehogs, a minimum of fifteen integrated bat roosting features and 30 integrated swift nesting boxes should be installed to enhance the site's value for biodiversity. Section 10 of the report also refers to habitat piles to be created within suitable locations. I am supportive of these recommendations and as no finalised details have been provided, these should be secured by condition once all other biodiversity issues are resolved.

10.129.11 Lighting - I am pleased to see that recommendations to reduce impacts of lighting are provided within the ecological report. No finalised lighting strategy has been provided and therefore, I recommend that a sensitive lighting strategy is secured by condition once all other biodiversity issues are resolved.'

10.130 In response to the points raised, the applicant has submitted additional information to address the above comments. The Biodiversity Officer is satisfied with the additional information and has advised:

'Habitats and Protected Species

10.130.1 I have reviewed the ecological information submitted as part of objections, including photos of wildlife (some of which are photographs of deceased badgers and amphibians). My conclusions remain that the ecological information submitted by Malford Environmental sufficiently addresses the potential ecological constraints associated with the proposed development.

10.130.2 It is noted that the Government published a draft version of the NPPF on the 16th of December 2025. The consultation period for the aforementioned document expires on the 10th of March 2026 and it is anticipated that a final version of the NPPF will be released in Spring 2026. Whilst the draft NPPF is a consultation document, it is considered that the proposed policies within it are a material consideration and must be given a degree of weight at the present time. With regard to this, policy N2 (f) states that to contribute positively to the natural environment and support nature's recovery development proposals should incorporate integrated nest boxes into their construction unless there are compelling technical reasons which prevent their use, or would make them ineffective.'

10.131 A condition is proposed which would require the developer to make biodiversity enhancements, such as integrated bird and bats boxes, hedgehog gaps in fences and log piles. A Construction Environmental Management Plan - Biodiversity is also proposed in order to ensure that the construction phase of the development minimises its impact on biodiversity.

10.132 With regard to Biodiversity Net Gain (BNG), the Biodiversity Officer states:

' Biodiversity Net Gain

10.132.1 The latest BNG information now demonstrates the following:

- *8.68% net loss in area habitat units,*
- *695.35% net gain in hedgerow units,*
- *16.00% net gain in watercourse units.*

10.132.2 After reviewing the latest BNG information, I am now satisfied that all previously identified issues have been addressed. The latest proposals will result in a net loss of area habitat units, however, the latest ecological addendum states that:

10.132.3 "The proposed residential development scheme does not meet the requirements of the Environment Act 2021 as it does not achieve the statutory 10% BNG requirement for 'area habitats'. Therefore, for this scheme the BNG

unit deficit of 0.73 units will be financially compensated through purchasing off-site units from a suitable habitat bank or broker."

10.132.4 The development will require a combination of on-site habitat creation and purchase of additional BNG units to satisfy the requirements for mandatory BNG. These units do not need to be purchased until after an REM application has been approved. However, to successfully discharge the biodiversity gain condition, the units must be allocated to the development prior to the submission of a compliance application.

10.132.5 As the BNG proposals have now been agreed, a Habitat Management and Monitoring Plan (HMMP) will be needed to inform the S106 agreement. Monitoring fees for onsite habitats will also need to be secured by the S106 agreement.'

10.133 It is considered that the proposed development can reasonably meet the requirement to deliver a minimum 10% Biodiversity Net Gain.

10.134 The proposal is considered to accord with Local Plan Policy EN8 and guidance in Section 15 of the NPPF.

Other Matters

10.135 With regard to trees, the Council's Tree Officer states:

10.135.1 'There is a veteran and protected oak tree off site to the north just outside the blue line boundary of the site. It is sufficiently far enough away from the red line boundary site to not be impacted.

10.135.2 There are a number of trees of moderate and high arboricultural quality (as defined in BS5837) just off-site or on the site boundary in the south western and south eastern corners of the site. Current site layouts indicate that with appropriate tree protection, detrimental impacts on these trees can be avoided and there is sufficient space between these trees and proposed new dwellings. At reserved matters a finalised BS5837 compliant arboricultural impact assessment tree protection plan should be submitted for approval.

10.135.3 A row of spaced out younger trees of lower arboricultural growing in the rear gardens of modern housing to the south of the site will not be impacted.

10.135.4 A short section of lower quality hedgerow and a small number of newly planted trees will need to be removed to enable site access. Subject to new tree planting to mitigate for this loss I have no objection to this removal.

10.135.5 New tree planting is proposed. This is supported and should include trees that will, where space allows, grow to an ultimately large size.'

10.136 A tree protection condition is proposed as part of this recommendation. It is considered that the proposed development can be undertaken in accordance with Local Plan Policy EN7.

10.137 With regard to archaeology, this application is accompanied by a geophysical survey report and the results of field evaluation trial trenching. The information has been assessed by GCC Archaeology which advises:

10.137.1 'The result of the archaeological investigations within the current application site was positive, and identified a series of ditch and gulley enclosure systems and post-hole groups. Pottery was recovered from a high proportion of these features and indicated that the site was a settlement site dating to the early and middle Iron Age. Medieval or post-medieval furrows were also identified across the proposed development area.

10.137.2 Although the archaeology on this site is not of the highest significance, so meriting preservation in situ, the archaeological deposits on this site will make an important contribution to our understanding of the archaeology of the county and the wider region.

10.137.3 There is therefore no objection in principle to the development of this site, with the proviso that an appropriate programme of work to excavate and record any significant archaeological remains should be undertaken prior to development in order to mitigate the ground impacts of this scheme.'

10.138 A condition is proposed which will secure the implementation of a programme of archaeological work in accordance with a written scheme of investigation, should permission be granted for this application. Historic England has offered no comments in relation to the proposal.

10.139 With regard to contamination, the applicant has submitted a Phase 1 Desk Study, which has been assessed by the Council's Environmental and Regulatory Services Contamination Officer. The respective Officer states *'The technical document supplied is a Phase 1 Desk Study of the site, and includes a conceptual site model, with a S-P-R approach, as well as a site walkover. The*

report denotes several onsite sources of potential contamination associated with generic farmyard activities from the historical use of the site as an agricultural field. It appears most of the potential sources of contamination are localised to the northwestern part of the site, noted as 'Zone B' by the report. The Desk Study recommended a further Intrusive Site Investigation in order to assess whether the site is suitable for intended use, as currently there is an unacceptable risk of harm to human health. I concur with this recommendation, and would welcome the opportunity to review any scope of works or methodology proposed.' No objection is raised to the development in principle, subject to a condition requiring the submission of a site investigation and remediation scheme. The application is therefore considered to accord with the requirements of Local Plan Policy EN15 in this respect. Historic England has been consulted but has not offered any comments in relation to the proposal.

10.140 With regard to financial contributions, GCC has requested contributions of £39,771.20 to secondary 16-18 education and £5,880 to library services. A contribution of £50,000 to community transport is also requested. The applicant is currently in discussions with GCC about the level of the community transport contribution and it is anticipated that an update will be provided at the Committee meeting.

10.141 Having regard to the size of the development, it is considered that the requested contributions are necessary to make the development acceptable in planning terms, are directly related to the proposed development and are fairly and reasonably related in scale and kind to the development. The contribution request is considered to accord with Regulation 122 of the Community and Infrastructure Levy Regulations 2010.

10.142 Willersey Parish Council has submitted a request for financial contributions towards the following:

iv) Village Hall extension & upgrades;
v) Recreation Ground improvements;
vi) Cemetery improvements;

10.143 The submitted request includes £8,000 towards the village's recreation ground, £5,950 - £10,200 towards a 85m long tarmac footpath at the cemetery and £290,760 towards an extension to the village hall. Whilst Officers consider that the figures for the recreation ground and cemetery footpath appear broadly reasonable, concerns are raised about the figure for the village hall extension. It is of note that a contribution of £40,000 towards improvements at the village hall was secured as part of the Folly View development in 2016 (16/01572/FUL).

The aforementioned development was for 30 dwellings and was therefore the same size as the scheme now proposed. Even if inflation and other increases are taken into account, the figure of £290,760 appears high when compared to that secured in 2016. At the time of writing this report, the applicant is in discussions with the parish council about the level of contribution. It is anticipated that an update will be provided at the Committee in relation to this matter.

10.144 The proposed development would result in the loss of an area of agricultural land. Paragraph 187 of the NPPF states that planning should recognise *'the intrinsic character and beauty of the countryside and the wider benefits of the natural capital and ecosystem services - including the economic and other benefits of the best and most versatile agricultural land...'* In this instance, it is unclear whether the land falls into the Best and Most Versatile category. However, even if it were to be considered as such, its use for grazing and its modest size mean that its economic and other benefits are considered to be limited and not to outweigh the benefits arising from the delivery of new housing.

10.145 In light of the need for the applicant and Severn Trent Water to resolve foul drainage capacity, it is considered reasonable for the time period for the submission of reserved matters to be extended from 3 years to 5 years in order to provide a degree of flexibility for both parties.

10.146 This application is liable for the Community Infrastructure (CIL) and there will be a CIL charge payable. Section 143 of the Localism Act 2011 states that any financial sum that an authority has received, will, or could receive, in payment of CIL is a material 'local finance consideration' in planning decisions.

11. Conclusion

11.1 It is considered that the proposed development would make a positive contribution to the Council's supply of deliverable housing land and the provision of affordable housing. With regard to the latter, the proposal would help to address local housing needs. In addition, the proposed development would potentially support village services and facilities, such as the existing public houses, employment estate and school. In light of the Council's housing land supply position, it is considered that the delivery of the new housing represents a significant material consideration that weighs heavily in favour of the proposed scheme. It is noted that the proposal would result in the development of a greenfield site within the Cotswolds National Landscape. However, the character and appearance of the site is heavily influenced by

existing residential development and the scheme is considered to be of size and form that would not have an unacceptable impact on the character or appearance of the designated landscape. The proposed development is also considered not to be of a size or form that would have an unacceptable impact on highway safety, a severe impact on the road network, or cause adverse harm to residential amenity, biodiversity, trees or archaeology. The concerns raised in relation to foul drainage capacity are noted. However, it is considered that this matter can be addressed fully by condition.

11.2 It is considered that the impact of the proposal on the Cotswolds National Landscape would not provide a strong reason to refuse the application. In addition, the benefits of the proposal are considered not to be significantly and demonstrably outweighed by its adverse impacts. It is therefore recommended that the application is granted permission subject to no objection from the LLFA and completion of a S106 legal agreement covering matters such as affordable housing, self-build/custom building housing, education, library and highway contributions and contributions to the parish council.

12. Proposed Conditions:

1. Application for the approval of the reserved matters shall be made to the Local Planning Authority by 5 years from the date of this decision notice.

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

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

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

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

4. This decision relates to the land outlined in red on drawing number 2411 200 D and proposed site access arrangements shown on drawing FIGURE 3.1.

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

5. Prior to the first occupation of any dwelling hereby permitted, a pedestrian access shall be provided from the application site onto Public Right of Way HWY9 fully in accordance with details that have first been submitted to and approved in writing by the Local Planning Authority. The approved access shall be retained in accordance with the approved details thereafter.

Reason: In order to ensure that a safe and accessible route to the village centre and associated services and facilities is provided for future occupants of the development hereby permitted in accordance with Local Plan Policy INF3.

6. i) No development shall take place until a site investigation of the nature and extent of contamination has been carried out in accordance with a methodology which has previously been submitted to and approved in writing by the local planning authority. The results of the site investigation shall be made available to the local planning authority before any development begins. If any significant contamination is found during the site investigation, a report specifying the measures to be taken to remediate the site to render it suitable for the development hereby permitted shall be submitted to and approved in writing by the local planning authority before any development begins.

ii) The Remediation Scheme, as agreed in writing by the Local Planning Authority, shall be fully implemented in accordance with the approved timetable of works and before the development hereby permitted is first occupied. Any variation to the scheme shall be agreed in writing with the Local Planning Authority in advance of works being undertaken. On completion of the works the developer shall submit to the Local Planning Authority written confirmation that all works were completed in accordance with the agreed details.

If, during the course of development, any contamination is found which has not been identified in the site investigation, additional measures for the remediation of this contamination shall be submitted to and approved in writing by the Local Planning Authority. The remediation of the site shall incorporate the approved additional measures.

Reason: To ensure any contamination of the site is identified and appropriately remediated in accordance with Local Plan Policy EN15. It is important that these details

are agreed prior to the commencement of development as any on-site works could have implications for pollution and human health.

7. 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 which has been submitted by the applicant and approved in writing by the Local Planning Authority.

Reason: It is important to agree a programme of archaeological work in advance of the commencement of development, so as to make provision for the investigation and recording of any archaeological remains which may be present. The archaeological programme will advance understanding of any heritage assets which will be lost, in accordance with paragraph 218 of the National Planning Policy Framework.

8. Prior to the commencement of development, a foul water drainage scheme shall be submitted to and approved in writing by the Local Planning Authority.

The drainage scheme shall:

i) Include the design of all on and off-site foul sewerage infrastructure, the diameters of proposed pipes and the capacity of any on or off-site storage;

ii) Include a timetable and programme for the provision of the foul sewerage infrastructure; and

iii) Demonstrate that, where connection to a public sewer is proposed, the additional foul sewerage discharge can be accommodated within the public sewer system without increasing the risk of flooding or backing up of the existing system on the site or elsewhere. The development shall be carried out in accordance with the approved details and the approved timetable and programme.

Reason: In order to ensure that the development hereby permitted is provided with a satisfactory means of foul drainage as well as reducing the risk of creating or exacerbating a flooding problem and to minimise the risk of pollution in accordance with Local Plan Policies EN14 and EN15. It is important that these details are agreed prior to the commencement of development in order to ensure that the proposal will not have an adverse impact on foul drainage and to ensure that adequate infrastructure can be provided.

9. No dwelling hereby permitted shall be occupied until confirmation has been provided that either:

i) all water network upgrades required to accommodate the additional demand to serve the development have been completed; or

ii) a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan.

Reason: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development

10. The development shall not commence until a 30-year Habitat Monitoring and Management Plan (HMMP), prepared in accordance with an approved Biodiversity Gain Plan, has been submitted to and approved in writing by the local planning authority. The approved HMMP shall be strictly adhered to and implemented in full for its duration and shall contain the following:

a. Description and evaluation of the features to be managed;

b. Ecological trends and constraints on site that may influence management;

c. Aims, objectives and targets for management - links with local and national species and habitat action plans;

d. Description of the management operations necessary to achieving the aims and objectives;

e. Prescriptions for management actions;

f. Preparation of a works schedule, including annual works schedule;

g. Details of the monitoring needed to measure the effectiveness of management;

h. Details of the timetable for each element of the monitoring programme;

i. Details of the persons responsible for the implementation and monitoring;

j. Mechanisms of adaptive management to account for necessary changes within the work schedule to achieve the required targets; and

k. Reporting on year 1, 2, 5, 10, 15, 20, 25 and 30 with biodiversity reconciliation calculations at each stage.

The HMMP shall be implemented in accordance with the approved details, and all habitats shall be retained in that manner thereafter. Notice in writing shall be given to the Council when the habitat creation and enhancement works as set out in the Biodiversity Gain Plan have commenced and once all habitat creation and enhancement works have been completed.

Reason: To secure the delivery of at least a 10% biodiversity net gain through successful establishment and management of all newly created and enhanced habitats in accordance with Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021), paragraph 187, 192 and 193 of the NPPF, and Local Plan Policy EN8. It is important that these details are agreed prior to the commencement of development as any on-site works could have implications for biodiversity.

11. The development shall be undertaken in accordance with the recommendations contained within sections 6.4, 7.1.3, and 7.1.4 of the Ecological Appraisal report (Malford Environmental Consulting, 11th August 2025) and sections 7.1.1 and 7.1.2 of the Ecological Appraisal Addendum (Malford Environmental Consulting, 12th November 2025). All of the recommendations shall be implemented in full according to the specified timescales, and thereafter permanently retained.

Reason: To ensure biodiversity is protected in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife and Countryside Act 1981 (as amended), Circular 06/2005, paragraphs 187, 192 and 193 of the National Planning Policy Framework, Policy EN8 of the Cotswold District Local Plan 2011- 2031 and in order for the Council to comply with Part 3 of the Natural Environment and Rural Communities Act 2006.

12. An application for the approval of Reserved Matters shall include a Construction Environmental Management Plan - Biodiversity (CEMP-B) informed by an up-to-date ecological impact assessment. The CEMP-B shall include, but not necessarily be limited to, the following:

i. Risk assessment of potentially damaging construction activities;

ii. Identification of "biodiversity protection zones";

iii. Details of deep excavations to be infilled or ramped access provided to prevent pitfall danger to mammals;

iv. Practical measures (both physical and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements);

v. The location and timing of sensitive works to avoid harm to biodiversity features (e.g. daylight working hours only starting one hour after sunrise and ceasing one hour before sunset);

vi. The timing during construction when ecological or environmental specialists need to be present on site to oversee works;

vii. Responsible persons and lines of communication;

viii. The role and responsibility on site of an ecological clerk of works (ECoW) or similar person;

ix. Use of protective fences, exclusion barriers and warning signs, including advanced installation and maintenance during the construction period;

x. Ongoing monitoring, including compliance checks by a competent person(s) during construction and immediately post-completion of construction works.

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

Reason: To protect biodiversity in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife and Countryside Act 1981 (as amended), the Protection of Badgers Act 1992, the Circular 06/2005, paragraphs 187, 192 and 193 of the National Planning Policy Framework, Local Plan Policy EN8, and Section 40 of the Natural Environment and Rural Communities Act 2006.

13. Prior to the installation of external lighting for the development hereby permitted, a lighting design strategy for biodiversity shall be submitted to and approved in writing by the Local Planning Authority. The strategy shall:

i. Identify areas/features on site that are particularly sensitive for nocturnal wildlife, including foraging/commuting bats and badgers;

ii. Show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly

demonstrated that areas to be lit will not disturb or prevent the above species using their nocturnal corridors.

All external lighting shall be installed in accordance with the approved strategy and retained as such thereafter. No external lighting shall be installed other than in accordane with the approved details.

Reason: To protect nocturnal wildlife in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife and Countryside Act 1981 (as amended), Circular 06/2005, paragraphs 187, 192 and 193 of the National Planning Policy Framework (Chapter 15), local plan policy EN8 and in order for the Council to comply with Part 3 of the Natural Environment and Rural Communities Act 2006

14. Prior to installation of any external lighting, an external lighting design strategy shall be submitted to and approved in writing by the Local Planning Authority. The strategy shall demonstrate how the proposed development has been designed to minimise light pollution and the impact of development on dark skies and the character and appearance of the Cotswolds National Landscape, No external lighting shall be installed on the application site other than in accordance with the approved details.

Reason: In order to minimise light pollution and the impact of the development on dark skies and the character and appearance of the Cotswolds National Landscape in accordance with Local Plan Policies EN4 and EN5 and guidance in Section 15 of the National Planning Policy Framework.

15. Prior to the erection of any external walls of the development hereby permitted, a finalised Biodiversity Enhancement Plan for the site containing details of the provision of:

i. Integrated bird boxes installed within the fabric of new dwellings;

ii. Integrated bat boxes installed within the fabric of new dwellings;

iii. Habitat piles;

iv. Gaps in fencing and boundary treatments for hedgehogs;

shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved specification and programme of implementation and be retained as such thereafter.

Reason: To protect and enhance the site for biodiversity in accordance with paragraphs 187, 192 and 193 of the National Planning Policy Framework, Policy EN8 of the Cotswold District Council Local Plan, and for the Council to comply with Section 40 of the Natural Environment and Rural Communities Act 2006.

16. An application for reserved matters shall include a drawing/schedule which sets out the proposed size and mix of dwellings and which shall include the number of bedrooms in each respective dwelling. No more than 8 of the dwellings shall have 4 bedrooms or more, with the remainder of the development being 1, 2 and 3 bedroom dwellings. The development shall be undertaken fully in accordance with the approved drawing/schedule.

Reason: In order to ensure that the development contains an appropriate mix of dwellings in accordance with the requirements of Local Plan Policy H1.

17. Prior to the first occupation of the development hereby permitted, a timetable for the adoption of the estate roads and the completion of other roads and footpaths, including details relating to the future maintenance and management of the unadopted roads and footpaths shall be submitted to and approved in writing by the Local Planning Authority. The development shall be undertaken in accordance with the approved details and maintained/managed in accordance with those details thereafter.

Reason: In order to ensure that the road and footpath network is completed and thereafter maintained to an acceptable standard in the interests of highway safety and in accordance with Local Plan Policy INF4 and Section 14 of the National Planning Policy Framework.

18. Prior to the erection of any external walls of the development hereby permitted, a detailed scheme for the provision and future maintenance and management of Public Open Space, including play equipment, litter bins, benches, dog waste bins and associated hard and soft landscaping, shall be submitted to and approved in writing by the Local Planning Authority.

The scheme shall include the provision, type and layout of Public Open Space and associated facilities and a programme for implementation. The scheme shall thereafter be provided, maintained and managed in accordance with the approved details and timetables.

Reason: To ensure that future residents will have access to areas of open space and recreation and to ensure that such areas are provided and maintained to a satisfactory standard for the longer term in accordance with Local Plan Policies INF2 and EN2.

19. The details submitted at the Reserved Matters stage shall include a Tree Protection Plan which shall be in accordance with BS5837:2012 'Trees in relation to design, demolition and construction - recommendations'.

Prior to the commencement of any works on site (including site clearance), the tree protection as detailed in the approved Tree Protection Plan shall be installed fully in accordance with the approved details and shall remain in place until the completion of the construction stage of the development.

Fires on site 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. Materials that would contaminate the soil such as cement or diesel must not be discharged with 10m of the tree stem. Existing ground levels shall remain the same within the Construction Exclusion Zone and no building materials or surplus soil shall be stored therein. All service runs shall fall outside the Construction Exclusion Zone unless otherwise approved in writing by the Local Planning Authority.

Reason: To safeguard the retained/protected tree/s in accordance with Cotswold District Local Plan Policy EN7.

20. Prior to commencement of the development hereby permitted, a Construction Management Plan (CMP) shall be submitted to and approved in writing by the Local Planning Authority. The development shall be undertaken fully in accordance with the approved CMP. The CMP shall include but not be restricted to:

i) Parking of vehicle of site operatives and visitors (including measures taken to ensure satisfactory access and movement for existing occupiers of neighbouring properties during construction);

ii) Advisory routes for construction traffic;

iii) Any temporary access to the site;

iv) Locations for loading/unloading and storage of plant, waste and construction materials;

v) Method of preventing mud and dust being carried onto the highway;

vi) Arrangements for turning vehicles;

vii) Arrangements to receive abnormal loads or unusually large vehicles;

viii) Highway Condition survey;

ix) Methods of communicating the Construction Management Plan to staff, visitors and neighbouring residents and businesses;

x) Delivery and construction hours.

Reason: In the interests of highway safety in accordance with Local Plan Policy INF4. It is important that these details are agreed prior to the commencement of development as any on site works or construction/delivery traffic could have implications for the safe operation of the highway.

Informatives:

1. IMPORTANT: BIODIVERSITY NET GAIN CONDITION - DEVELOPMENT CANNOT COMMENCE UNTIL A BIODIVERSITY GAIN PLAN HAS BEEN SUBMITTED (AS A CONDITION COMPLIANCE APPLICATION) TO AND APPROVED BY COTSWOLD DISTRICT COUNCIL.

The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for the development of land in England is deemed to have been granted subject to the condition "(the biodiversity gain condition") that development may not begin unless:

(a) a Biodiversity Gain Plan has been submitted to the planning authority, and

(b) the planning authority has approved the plan in writing.

The planning authority, for the purposes of determining whether to approve a Biodiversity Gain Plan if one is required in respect of this permission would be Cotswold District Council. There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. Based on the information available this permission is considered to be one which will require the approval of a biodiversity gain plan before development is begun because none of the statutory exemptions or transitional arrangements are considered to apply. If the onsite habitats include irreplaceable habitats (within the meaning of the Biodiversity Gain Requirements (Irreplaceable Habitats) Regulations 2024) there are additional requirements for the content and approval of Biodiversity Gain Plans. Advice

about how to prepare a Biodiversity Gain Plan and a template can be found at https://www.gov.uk/guidance/submit-a-biodiversity-gain-plan.

Information on how to discharge the biodiversity gain condition can be found here: https://www.cotswold.gov.uk/planning-and-building/wildlife-and-biodiversity/biodiversity-net-gain-bng/

2. Please note that the proposed development set out in this application will be liable for a charge under the Community Infrastructure Levy (CIL) Regulations 2010 (as amended). The amount of the liability will be calculated when the related reserved matters application is determined. Further information about CIL is available at www.cotswold.gov.uk/CIL

3. Please note for the use or reuse of sewer connections either direct or indirect to the public sewerage system the applicant will be required to make a formal application to the Severn Trent Water under Section 106 of the Water Industry Act 1991. They may obtain copies of our current guidance notes and application form from either its website (www.stwater.co.uk) or by contacting its Developer Services Team (Tel: 0800 707 6600).

Before undertaking any work on site, all applicants should determine if Severn Trent Water has any assets in the vicinity of the proposed works. This can be done by accessing our records at www.digdat.co.uk

Severn Trent Water advises that even if its statutory records do not show any public sewers within the area you have specified, there may be sewers that have been recently adopted under The Transfer of Sewer Regulations 2011.

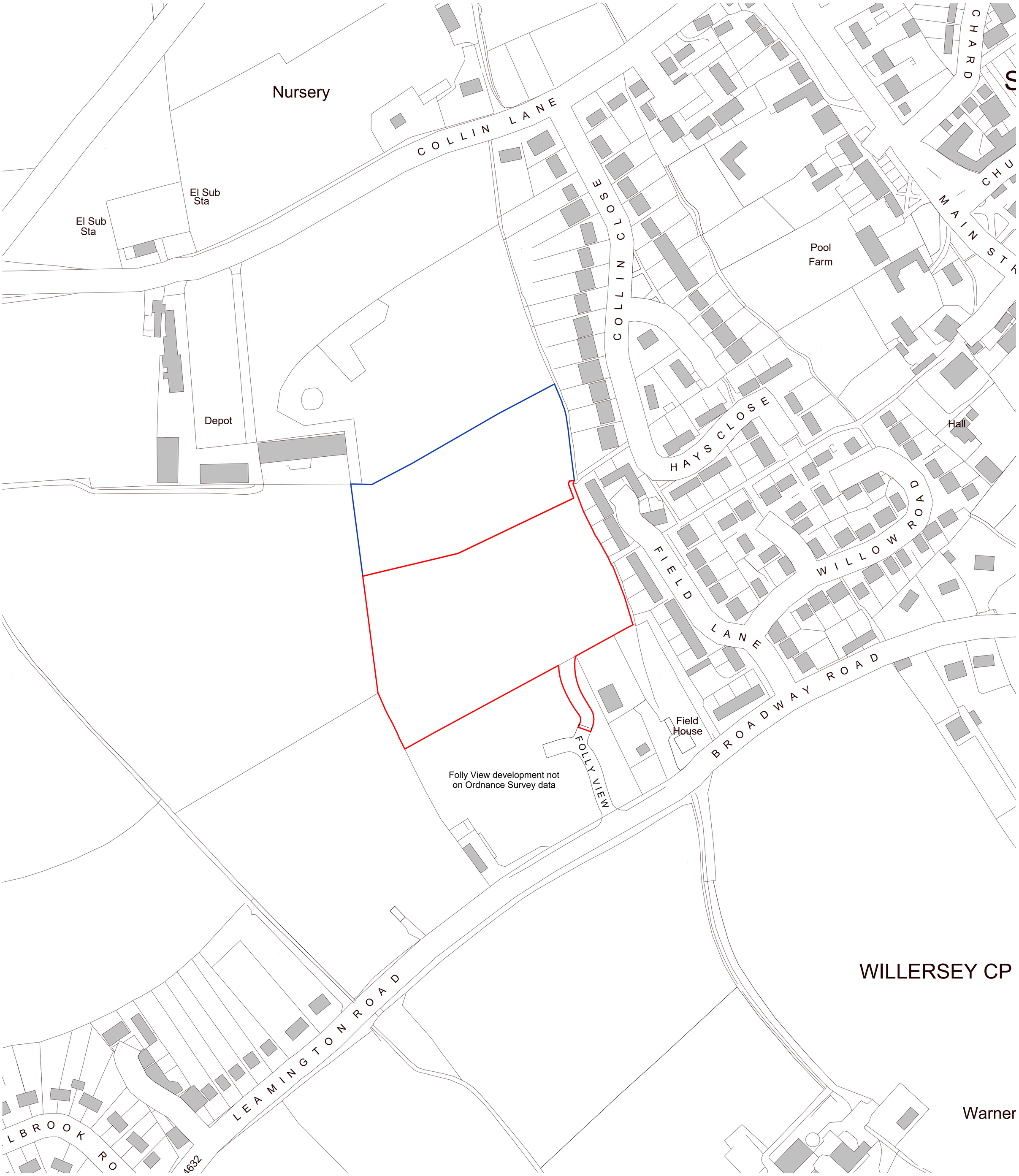
Severn Trent Water records indicate that there are assets that may be affected by this proposal and as such the applicant must contact Severn Trent before any work takes place.

Public sewers and Water mains have statutory protection and may not be built close to, or diverted without consent, consequently you must contact Severn Trent Water to discuss your proposals. Severn Trent will seek to assist you obtaining a solution which protects both the public sewer and the proposed building.

4. This estate road and drainage layout will require approval under Section 38 of the Highways Act 1980 if it is to be adopted as 'highway maintainable at public expense'.

There are detailed issues that need to be approved in order to achieve technical approval under that process and the developer should contact Gloucestershire County Council to ensure that approvals and agreements are secured before commencement of works. The obtaining of planning permission for any design/layout will not be considered as a reason to relax the required technical standards for the adoption of the road and drainage and any changes may necessitate the submission of further planning applications. If the road is to be private then the residents should be advised that they may be taking on the responsibilities and liabilities of the highway authority with regards to maintenance, snow clearance etc and advised to take advice on public liability insurance against claims associated with those responsibilities.

NOTES



WILLERSEY CP

Warner

Extent of land under the control of the applicant (blue line) to be confirmed.

O3arch.

23 Westfield Park, Bristol. BS6 6LT
Telephone: 0117 329 3970
Email: mail@o3arch.co.uk

Rev	Revision Details	Dr	Date
D	App boundary amended at access		29/07/25
C	Application boundary updated		08/07/25
B	Road name corrected and fonts reduced		03/03/25
A	Minor amendments		30/01/25
-	Preliminary Issue		14/11/24

THIS DRAWING IS NOT TO BE SCALED.

Except for the purposes of planning applications and for legal plans where the scale bar **must** be used. Always refer to figured dimensions. Verify site dimensions prior to construction and report discrepancies immediately. This drawing is to be read in conjuction with all relevent documents and drawings.

Client's Name
Eagle One Ltd

Job Title
Land North of Folly View, Willersey

Drawn MD | Checked -

Date

Scale
1 : 1250 @ A1

Drawing Title
Location Plan

Scale
metres 10 20 30 40

Job No 2411 | Drawing No 200 | Rev D

Status
PRELIMINARY

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NOTES



O3arch.
23 Westfield Park, Bristol. BS6 6LT
Telephone: 0117 329 3970
Email: mail@o3arch.co.uk

Rev	Revision Details	Dr	Date
J	App boundary amended at access		29/07/25
H	Specimen trees and shrub planting added		15/07/25
G	Plot 23 updated		15/07/25
F	Amended to consultant comments		08/07/25
E	AH provision amended		11/02/25

THIS DRAWING IS NOT TO BE SCALED.

Except for the purposes of planning applications and for legal plans where the scale bar **must** be used. Always refer to figured dimensions. Verify site dimensions prior to construction and report discrepancies immediately. This drawing is to be read in conjuction with all relevent documents and drawings.

Client's Name
Eagle One Ltd

Job Title
Land North of Folly View, Willersey

Drawn: Author
Checked: Checker
Date:
Scale: 1 : 500 @ A1

Drawing Title
Illustrative Masterplan

Scale
metres 10 20 30 40

Job No: 2411
Drawing No: 220
Rev: J
Status: PLANNING

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View from Public Right of Way to north of application site





Above: Route of proposed entrance road

Below: Folly View from B4632



Proposed re-location of stable yard including provision of new access, new buildings and siting of a mobile home and associated works. demolition of existing stables and buildings and conversion of existing barns to form two dwellinghouses (phased development) at Wyck Hill Farm Racing Stables Wyck Hill Farm Wyck Hill Stow Stow-on-the-Wold Cheltenham Gloucestershire GL54 1HT

Full Application 25/03122/FUL	
Applicant:	David Bridgwater Racing
Agent:	JPPC Chartered Town Planners
Case Officer:	Martin Perks
Ward Member(s):	Councillor Dilys Neill
Committee Date:	11 February 2026
RECOMMENDATION:	**PERMIT subject to completion of S106 legal agreement covering Biodiversity Net Gain**

1. Main Issues:

(a) Equestrian Development
(b) Conversion of Rural Buildings to Residential Accommodation
(c) Design and Impact on the Character and Appearance of the Cotswolds National Landscape
(d) Access and Highway Safety
(e) Biodiversity
(f) Flooding and Drainage

2. Reasons for Referral:

2.1 This application has been referred to Planning and Licensing Committee as it falls into the major development category as set out in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

3. Site Description:

3.1 This application relates to an existing equestrian development occupying a hillside location in an area of open countryside approximately 1.9km to the south of the town of Stow-on-the-Wold. The application site measures approximately 6.1 hectares in size. The south-western boundary of the application adjoins the A424. The north-western boundary of the site adjoins fields. Its north-eastern boundary adjoins a field and a woodland. Land to the south-east of the application site comprises fields and a pair of dwellings (1 and

2 Paxton Place). The southern part of the site is occupied by a farmhouse, stone barn, Dutch barn and associated equestrian buildings and paraphernalia, including an outdoor riding arena.

3.2 The Grade II listed Wyck Hill Lodge is located to the south-west of the A424 opposite the main entrance to the existing site. A pair of dwellings (1 and 2 Vale Cottages) are located to the west of Wyck Hill Lodge.

3.3 The site is located within the Cotswolds National Landscape (formerly the Cotswolds Area of Outstanding Natural Beauty).

3.4 Icomb Camp Scheduled Ancient Monument (SAM) is located approximately 420m to the east of the site.

3.5 The site is located within Flood Zone 1.

3.6 Public Right of Way HMA5 runs in a north-south direction to the west of the A424, approximately 120m from the application site at its closest point.

4. Relevant Planning History:

4.1 CD.7824 Erection of general purpose building. Permitted 1994

4.2 04/00490/FUL Change of Use of existing farm and agricultural land for racehorse training and stables and creation of gallops. Permitted 2004

4.3 09/02333/FUL Erection of new barn, new stable block, horse exerciser and manege/schooling ring. Permitted 2009

4.4 10/04294/FUL Conversion of existing detached barn and stables to provide dwelling and racing stable offices in association with the equestrian use, and erection of detached garage. Permitted 2011

4.5 13/03094/FUL Erection of 3 stable blocks providing 25 stables and ancillary office, together with a horse walker. Permitted 2013

4.6 The dwelling approved under permission 10/04294/FUL is subject to the following condition:

14. The occupation of the dwelling shall be limited to a person solely or mainly working or last working in the locality in agriculture, forestry or equestrian, or a widow or widower of such a person and to any resident dependants.

Reason: In accordance with Cotswold District Local Plan Policy 19 the site is not in an area intended for general development. In accordance with PPS7 permission is granted only because the dwelling is required to house a person employed in agriculture, forestry or equestrian. In addition, the building would not be suitable for occupation other than ancillary to the use of the farm as a whole given its proximity to the working yard with reference to Cotswold District Local Plan Policies 5, 14 and 28.

5. Planning Policies:

- DS4 Open Market Housing o/s Principal/non-Pr
- H1 Housing Mix & Tenure to meet local needs
- EC3 All types of Employment-generating Uses
- EC6 Conversion of Rural Buildings
- EN1 Built, Natural & Historic Environment
- EN2 Design of Built & Natural Environment
- EN4 The Wider Natural & Historic Landscape
- EN5 Cotswolds AONB
- EN7 Trees, Hedgerows & Woodlands
- EN8 Bio & Geo: Features Habitats & Species
- EN10 HE: Designated Heritage Assets
- EN12 HE: Non-designated Heritage Assets
- EN13 HE:Conv'n of non-domestic historic bldgs
- EN14 Managing Flood Risk
- EN15 Pollution & Contaminated Land
- INF3 Sustainable Transport
- INF4 Highway Safety
- INF5 Parking Provision
- INF7 Green Infrastructure

6. Observations of Consultees:

6.1 Gloucestershire County Council Highways: No objection subject to condition

6.2 Gloucestershire County Council Lead Local Flood Authority: No objection subject to conditions

6.3 Gloucestershire County Council Archaeology: No objection.

6.4 Gloucestershire County Council Minerals & Waste: Recommends conditions relating to waste management and recycling.

6.5 Biodiversity Officer: No objection subject to conditions

6.6 Landscape Consultant: Comments included in report.

6.7 Tree Officer: No objection subject to condition.

6.8 Environmental and Regulatory Services Contamination: No objection subject to condition.

6.9 Environmental and Regulatory Services Air Quality: No objection

6.10 Historic England: *'Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application.'*

7. View of Parish Council:

7.1 No objection

8. Other Representations:

8.1 None

9. Applicant's Supporting Information:

- Arboricultural Impact Assessment
- Archaeological Written Scheme of Investigation
- Bat Survey Report
- Biodiversity Net Gain Statement
- Design and Access Statement
- Ecological Impact Assessment & Biodiversity Net Gain Assessment
- Flood Risk Assessment
- Geophysical Survey Report
- Heritage Assessment
- Landscape and Visual Appraisal
- Planning Statement
- Structural Inspection
- Transport Statement

10. Officer's Assessment:

Background and Proposed Development

10.1 Planning permission was granted in 2004 (04/00490/FUL) for the *'change of use of existing farm and agricultural land for racehorse training and stables and creation of gallops.'* The aforementioned application was submitted by the current applicant. The change of use covered approximately 86 hectares. The approved gallops extend for 4 furlongs and are 2m in width. The gallops lie to the north/north-east of the existing group of equestrian buildings and are located approximately 350m from the aforementioned buildings at their closest point.

10.2 In the period since 2004 the applicant has continued to develop the site and land. Permission has been granted for the erection of new barns, stables, riding arena and a horsewalker. Permission has also been granted previously for the conversion of the existing stone barn located in the southern corner of the application site to a dwelling. However, the aforementioned permission has not been implemented.

10.3 The applicant now wishes to improve the existing facilities on the site in order that the business can continue to grow. He wishes to replace the existing equestrian buildings and associated equipment with a new purpose-built equestrian facility on a field lying to the north-west of existing development. A number of the existing buildings would be removed and a landscape restoration scheme implemented. It is also proposed to convert the existing stone barn and adjacent Dutch barn to 2 independent dwellings and to provide a mobile home for an equestrian worker. The planning application form states that buildings measuring 1,567sq metres would be removed. The proposed development would have a total floor area of 4,642 sq metres, which would result in an increase in the floorspace of built development of 2,967 sq metres.

10.4 The principal elements of this scheme include:

i) The erection of 2 new equestrian buildings and an outdoor riding arena on a field lying adjacent to the north-western edge of the existing equestrian development. One of the proposed buildings would measure approximately 140m long by 25m wide by 7.5m high. It would house an indoor riding arena, 20 loose boxes, associated rooms, indoor horse walker and viewing area. To its north-west would be located a smaller American barn style building housing 20 loose boxes, associated rooms and an indoor horse walker. The proposed building would measure approximately 60m long by 25m wide by 7.5m high. To the south-west of the aforementioned building and north-west of the larger building, it is proposed to create an outdoor riding arena measuring approximately 72m long by 32m wide by 7.5m high. The proposed buildings would be of a portal framed construction. The lower walls would be concrete block, with the upper walls being a black vertical timber cladding. The application drawings also refer to *'curtains'*, which would enable some of the upper parts of the external walls to be opened to allow ventilation and light into the building. The roof would be covered in a dark grey metal standing seam sheeting.

ii) The lowering of land levels in order to create a level surface on which the above mentioned buildings and riding arena can be located. The existing field slopes downwards gradually from the south-east to the north-west. The creation of a level surface would require the erection of a retaining wall measuring approximately 4m- 6.5m in height along the south-eastern edge of the excavated area.

iii) The erection of a new barn approximately 15m to the south-west of the indoor riding arena barn. The proposed barn would measure approximately 18m long by 12m wide by 5.5m high. The lower walls would be concrete block, with the upper walls being a black vertical timber cladding. The roof would be covered in a dark grey metal standing seam sheeting.

iv) The siting of a horsewalker adjacent to the north-eastern end of the indoor riding arena barn.

v) The stationing of a mobile home for an equestrian worker on land approximately 20m to the north-east of the proposed American barn. It would replace existing groom's accommodation in a roadside stable building.

vi) The conversion and extension of the existing stone barn to create a 4-bedroom dwelling. An existing single storey part stone/part blockwork addition which extends to the side/rear of the barn would be removed and replaced with a new single storey extension measuring approximately 22m long by 4.5m in height. The external walls of the proposed extension would be clad in timber, and the roof would be covered in a metal standing seam cladding. The existing addition has a corrugated metal roof.

vii) The conversion and alteration of an existing Dutch barn to create a 3-bed dwelling.

viii) The conversion of an existing single storey building in the farmyard to a 4-bay garage and home office.

ix) The provision of 19 car spaces, including 3 electric vehicle spaces, adjacent to the new equestrian buildings.

x) The creation of a new vehicular access onto the A424. The existing access is substandard, and it is proposed to create a new entrance that would afford safer access and egress to and from the site. The proposed entrance would be located approximately 260m to the north-west of the existing yard. An access road measuring approximately 170m would extend from the new entrance to the new equestrian buildings.

(a) Equestrian Development

10.5 The Local Plan does not include a policy that specifically relates to equestrian development. As such, proposals for new or extended equestrian facilities have to be assessed in the context of the Local Plan as a whole taking into consideration matters such as landscape impact, impact on protected species, highway safety, impact on residential amenity etc. These aspects of the proposal will be addressed later in this report. Notwithstanding this, it is noted that the applicant has operated a successful equestrian business on the site for approximately 20 years. The business employs 4 full-time and 3 part-time workers. The existing business is involved in the training of racehorses and can accommodate up to 40 horses.

10.6 With regard to the Local Plan, Policy EC3: Proposals for All Types of Employment-Generating Uses covers employment is relevant to employment related development in the countryside. Criterion 2 states:

2. Outside Development Boundaries, and outside established employment sites, proposals for small-scale employment development appropriate to the rural area will be permitted where they:

a. do not entail residential use as anything other than ancillary to the business; and

b. are justified by a business case, demonstrating that the business is viable; or

c. facilitate the retention or growth of a local employment opportunity.

10.7 It is considered that the proposed development, in terms of floor area, is of a size that would represent more than *small-scale employment development.'* However, in terms of employee numbers it is considered that it would fall within the scope of the above policy. Furthermore, the current proposal is for the re-development of an existing operation, rather than the introduction of an entirely new business in the countryside. On this basis, it is considered that a degree of flexibility can be offered when assessing the proposal against Policy EC3.

10.8 In addition to the above, paragraphs 88 and 89 of the National Planning Policy Framework (NPPF) are also considered applicable to this proposal:

10.9 Paragraph 88 of the NPPF states:

Planning policies and decisions should enable:

a) The sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, beautiful new buildings;

b) The development and diversification of agricultural and other land-based rural businesses;

c) Sustainable rural tourism and leisure developments which respect the character of the countryside; and

d) The retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.

10.10 Paragraph 89 of the NPPF states:

'Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to the surroundings, does not have an unacceptable

impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements , should be encouraged where suitable opportunities exist'.

10.11 It is evident that policy and guidance can offer support for the creation of sustainable economic development in the countryside. Such development can benefit the rural economy and generate an income for a range of existing businesses which are directly and indirectly related to the applicant's operation. In the case of this proposal, it is noted that the existing business has been operating for a number of years and is considered to be well established. The current proposal does not therefore represent a speculative proposal for new development in the open countryside, rather a reconfiguration and modernisation of the existing facilities. On this basis, it is considered that the proposal would *'facilitate the retention and growth of a local employment opportunity'* as set out in criterion c of Policy EC3.

10.12 With regard to paragraphs 88 and 89 of the NPPF, the proposal has the potential to support an established rural business. In addition, Paragraph 88 can be supportive in principle of conversion and new build schemes and proposals that benefit land based rural businesses. Notwithstanding this, it is noted that paragraph 89 requires development to be *'sensitive to its surroundings'* and paragraph 88 refers to *'sustainable'* growth and expansion. Whilst the proposed development would be located in the open countryside, it relates to an existing, established operation which already generates vehicle movements to and from the location. It is not therefore introducing new development into a location where no development exists. The proposal is for the re-development of an existing successful operation in the countryside and would benefit both the existing business and the rural economy. In addition, the proposal seeks to undertake landscape restoration and introduce new planting which would have positive implications for the area. On this basis, it is considered that the proposal accords with the aspirations of paragraphs 88 and 89 of the NPPF.

10.13 It is noted that this application includes a proposal to site a mobile home on the site. The mobile home would provide new accommodation for an existing groom who resides in part of a stable building on the site. It would therefore provide alternative accommodation rather than the creation of an additional residential unit on the site. The existing space in the stable building is small in size and would be used as ancillary accommodation in connection with one of the proposed dwellings arising from the barn conversions. Having regard to the size of the proposed equestrian development, it is considered that there is an essential need to provide a mobile home in addition to the accommodation provided in the existing farmhouse. A mobile home would also potentially

provide a larger living area than that provided in the existing stables. It is considered that there is a reasonable justification for the mobile home and that its provision accords with the requirements of Local Plan Policy H5: Dwellings for Rural Workers Outside Settlements.

(b) Conversion of Rural Buildings to Residential Accommodation

10.14 The current proposal would involve the conversion of a 19th Century stone barn and a post war Dutch barn into 2 separate dwellings.

10.15 The application site is located outside a Principal or Non-Principal Settlement. Paragraph 6.4.5 of the Local Plan states:

'For the purposes of Policy DS4, any land that falls outside Development Boundaries and Non-Principal Settlements is referred to as countryside, even if it is technically previously developed land.'

10.16 Guidance on the creation of new residential development in the open countryside is set out in Local Plan Policy DS4: Open Market Housing Outside Development Boundaries and Non-Principal Settlements. It states:

'New-build open market housing will not be permitted outside Principal and Non-Principal Settlements unless it is in accordance with other policies that expressly deal with residential development in such locations.'

10.17 The supporting text to Policy DS4 states:

'6.4.4: Policy DS4 is intended to preclude, in principle, the development of speculative new-build open market housing which, for strategic reasons, is not needed in the countryside. The policy does not, however preclude the development of some open market housing in rural locations; for example, dwellings resulting from the replacement or sub-division of existing dwellings, or housing created from the conversion of rural buildings. It would also not prevent alterations to, or extensions of, existing buildings. '

10.18 It is evident that Policy DS4 does not preclude the conversion of rural buildings to residential accommodation in locations outside Principal and Non-Principal Settlements. However, this guidance also has to be weighed against other policies in the Local Plan and national policy and guidance.

10.19 With regard to the conversion of the buildings themselves, Local Plan Policy EC6: Conversion of Rural Buildings is considered relevant to this proposal. It states:

'The conversion of rural buildings to alternative uses will be permitted provided:

a. The building is structurally sound, suitable for and capable of conversion to the proposed use without substantial alteration, extension or re-building;

b. It would not cause conflict with existing farming operations, including severance or disruption to the holding that would prejudice its continued viable operation; and

c. The development proposals are compatible with extant uses on the site and existing and planned uses in close proximity to the site.'

10.20 It is of note that Policy EC6 primarily deals with the suitability and capability of barns for conversion and the compatibility of the proposed use with existing uses. It does not therefore deal with wider issues such as the sustainability of a location or accessibility. In this respect, it is also necessary to have regard to guidance in Paragraph 84 of the National Planning Policy Framework (NPPF) which states that planning decisions should avoid the development of isolated homes in the countryside unless there are special circumstances. Paragraph 1.0.13 of the Local Plan states that *' Given the status of the NPPF, it is unnecessary for local planning documents to repeat its policies. It therefore is important in preparing planning proposals, or in reaching decisions on them, that the provisions of the NPPF are taken into account alongside policies in the Local Plan.'*

10.21 Paragraph 84 of the NPPF states:

Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:

a) there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside; or

b) where such development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets; or

c) where the development would re-use redundant or disused buildings and lead to an enhancement to the immediate setting; or

d) The development would involve the subdivision of an existing residential dwelling; or

e) the design is of exceptional quality, in that it:

- is truly outstanding or innovative, reflecting the highest standards in architecture, and would help to raise the standards of design more generally in rural areas; and

- would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area. '

10.22 The application site is considered to represent an isolated location in the countryside by virtue of its distance from the nearest settlement. It is therefore considered not to represent a sustainable location for new residential development in terms of its accessibility to services and facilities. Future occupiers of the development would be reliant on the use of the private motor car to undertake most day-to-day facilities. In order to address this issue, the proposed scheme would meet one or more of the special circumstances set out in Paragraph 84 in order for it to be acceptable.

Conversion of Stone Barn

10.23 The existing building is of stone construction and has a tiled roof. It appears on 19th Century maps and it is noted that the interior contains a number of historic timber beams and supports. On the basis of its age, materials, design and historic interest, it is considered that the existing barn is a non-designated heritage asset.

10.24 In addition to Policy EC6, the following policies and guidance are also considered of relevance when considering the conversion of the stone barn to a dwelling:

10.25 Local Plan Policy EN12 Non-Designated Heritage Assets

1. *Development affecting a non-designated heritage asset will be permitted where it is designed sympathetically having regard to the significance of the asset, its features, character and setting.*

2. Where possible, development will seek to enhance the character of the non-designated heritage asset. Proposals for demolition or total loss of a non-designated heritage asset will be subject to a balanced assessment taking into account the significance of the asset and the scale of harm or loss.

3. The assessment of whether a site, feature or structure is considered to be a non-designated heritage asset, will be guided by the criteria set out in Table 6

10.26 Local Plan Policy EN13 The Conversion of Non-Domestic Historic Buildings (Designated and Non-Designated Heritage Assets)

1 *'Proposals for the conversion of non-domestic historic buildings to alternative uses will be permitted where it can be demonstrated that:*

a. the conversion would secure the future of a heritage asset, and/or its setting, which would otherwise be at risk;

b. the proposed conversion would conserve the significance of the asset (including its form, features, character and setting);

c. the heritage asset is structurally sound; and

d. the heritage asset is suitable for, and capable of conversion to the proposed use without substantial alterations, extension or rebuilding which would be tantamount to the erection of a new building.

2.Proposals to extend or alter heritage assets that have been converted, will be permitted where it can be demonstrated that the proposed works would preserve the significance of the asset (including its form and features), its setting and/or the character or the appearance of the surrounding landscape in a manner that is proportionate to the significance of the asset.

10.27 Paragraph 216 of the NPPF states that *'the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.'*

10.28 In the context of Policy EC6, the existing building has a floor area in excess of 37sq metres and is therefore of a size capable of being used for residential purposes without the need for an extension. In addition, the building is considered to be in a reasonable structural condition. A structural report has been submitted with this application. It identifies some cracking in stonework and decay in one of the timber trusses in the principal barn. Whilst the single storey range is in a less sound condition, the respective report indicates that the principal building is capable of conversion to the proposed use following repairs. The building would not require substantial structural work to make it habitable. Officers have assessed the report and viewed the building on site and see no reason to disagree with the report's findings. It is noted that the single storey range extending to the rear of the principal building is to be removed. However, this is of more recent construction, and its retention is not integral to the ability of the principal part of the barn to be converted to residential use. Furthermore, the removal of the existing range and the erection of a replacement extension is not contrary to Policy EC6. The aforementioned policy can be supportive of extensions to buildings proposed for conversion subject to the existing building being capable of conversion to the proposed use in its own right without recourse to the extension. It is considered that the proposal accords with criterion a of Policy EC6.

10.29 With regard to criteria b and c of Policy EC6, it is noted that the existing barn is located in close proximity to existing equestrian operations and that a condition was attached to the 2011 permission for the conversion of the barn to a dwelling limiting its occupation to an equestrian worker. It was considered that an unrestricted residential use would potentially cause amenity issues for future residents of the dwelling and potentially have an adverse impact on the

operation of the equestrian business. In the case of the current proposal, it is evident that the applicant is proposing to relocate the existing equestrian facilities to a new site further from the stone barn. The land adjacent to the barn would be subject to landscape restoration and would be retained as a paddock area. The stable buildings adjacent to the Dutch barn would be demolished and the Dutch barn converted to residential use. It is considered that the relocation of the existing equestrian yard would enable the stone barn to be occupied as a dwelling without future occupants being subject to unacceptable harm from the equestrian operations or result in complaints which may prejudice the activities of the business. In the context of the development proposal as a whole, it is considered that the conversion of the barn would not cause conflict with equestrian operations and would be compatible with the site and its surroundings.

10.30 With regard to Policies EN12 and EN13 and guidance in paragraph 216 of the NPPF, the conversion scheme seeks to retain the principal architectural and historic features of the existing building. New openings would be kept to a minimum, with the existing large wagon openings being used to provide most of the light to the interior of the proposed dwelling. The existing building would therefore retain a relatively plain and understated appearance which is consistent with its historic use. The building would retain the character and appearance of an agricultural barn and will not take on the appearance of an overtly domestic building. In addition, the proposed extension would also have a plain, utilitarian appearance which is considered appropriate for the building and the site. There will be a limited number of openings in the building and the use of timber cladding, and a metal roof are redolent of agricultural buildings. The removal of the existing side/rear range is considered not to be harmful to the significance of the principal building given than it incorporates a number of modern materials and is in relatively poor condition. Furthermore, the submitted plans show that the open floor to roof space that is present within the stone barn would be retained to a significant degree.

10.31 It is considered that the proposed scheme is respectful of the barn's history and that the proposal would ensure that the significance of the barn as a non-designated heritage asset is retained. In addition, the proposal would secure both the optimal viable use of the building and its future as a heritage asset. The proposed conversion is considered to accord with Local Plan Policies EN12 and EN13 and guidance in paragraph 216 of the NPPF. Furthermore, it would accord with criterion b of paragraph 84 of the NPPF. As such, it is considered that there are reasonable grounds to support the conversion of the stone barn to a single dwelling.

Conversion of Dutch Barn

10.32 The existing barn is of post war construction and consists of a metal frame with elements of blockwork walling and timber cladding. Whilst the building does have a relatively open front, other sides of the building are enclosed. As with the stone barn, the existing building is in excess of 37sq metres in size and is therefore capable of being occupied as a dwelling without the need for extension. The building is of a size that can meet minimum residential floorspace requirements.

10.33 The structural report submitted with this application states that there is some minor surface corrosion of the metal framework and a crack in an area of blockwork. The building is otherwise sound subject to repairs. The existing framework is also capable of supporting additional loads arising from the proposed development. In addition, the applicant is seeking to retain existing cladding and blockwork. It is considered that the building is of sufficient substance to be capable of conversion to residential use without substantial alteration, extension or re-building. The proposal is considered to accord with criterion a of Policy EC6.

10.34 With regard to criteria b and c of Policy EC6, the issues raised previously in relation to the conversion of the stone barn are considered applicable to the conversion of the Dutch barn. Moreover, the relocation of the equestrian use would provide a degree of separation between the dwelling and the business operation. In addition, the creation of a new vehicular entrance for the equestrian business would ensure that equestrian related traffic would not need to pass in close proximity to the converted barn. It is considered that the proposal accords with Local Plan Policy EC6.

10.35 With regard to paragraph 84 of the NPPF, the proposed scheme would involve the removal of post war equestrian buildings attached to the rear of the Dutch barn as well as the introduction of landscape restoration scheme to its north-east. It is considered that the proposal would bring about enhancements to the immediate setting of the barn in accordance with criterion c of paragraph 84. The existing building is not currently redundant or dis-used but would become so following construction of the new equestrian facilities. It is therefore considered that a degree of flexibility can be offered in this respect.

10.36 It is considered that there a reasonable grounds to support the conversion of the Dutch barn to a dwellinghouse and that the benefits arising from the improvements to the immediate setting of the barn would justify support for the creation of a new dwelling in this instance.

10.37 It is noted that the Council cannot currently demonstrate a 5-year supply of housing land at the present time. On the basis that the current proposals for

residential use accord with paragraph 84 of the NPPF, it is considered that the delivery of 2 additional dwellings would contribute in a positive way to the Council's supply of housing land. This weighs in favour of the proposed scheme.

(c) Design and Impact on the Character and Appearance of the Cotswolds National Landscape

10.38 The application site is located within the Cotswolds National Landscape (CNL) (formerly known as the Cotswolds Area of Outstanding Natural Beauty (AONB)) wherein the Council *'must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.'* ((S85(A1) of the Countryside and Rights of Way Act 2000).

10.39 The following policies and guidance are considered applicable to this proposal:

10.40 Local Plan Policy EN1 Built, Natural and Historic Environment states:

'New development will, where appropriate, promote the protection, conservation and enhancement of the historic and natural environment by:

a. Ensuring the protection and enhancement of existing natural and historic environmental assets and their settings in proportion with the significance of the asset;

b. Contributing to the provision of multi-functional green infrastructure;

c. Addressing climate change, habitat loss and fragmentation through creating new habitats and the better management of existing habitats;

d. Seeking to improve air, soil and water quality where feasible; and

e. Ensuring design standards that complement the character of the area and the sustainable use of the development.'

10.41 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.'

10.42 Local Plan Policy EN4 The Wider Natural and Historic Landscape

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.'

10.43 Local Plan Policy EN5 Cotswolds Area of Outstanding Natural Beauty (AONB)

1.'In determining development proposals within the AONB or its setting, the conservation and enhancement of the natural beauty of the landscape, its character and special qualities will be given great weight.

2. Major development will not be permitted within the AONB unless it satisfies the exceptions set out in National Policy and Guidance.'

10.44 Local Plan Policy INF7: Green Infrastructure

1.Development proposals must contribute, depending on their scale, use and location, to the protection and enhancement of existing Green Infrastructure and/or the delivery of new Green Infrastructure.

2.New Green Infrastructure provision will be expected to link to the wider Green Infrastructure network of the District and beyond.

3. Green Infrastructure will be designed in accordance with principles set out in the Cotswold Design Code (Appendix D).

10.45 In terms of national policy, Paragraph 187 of the National Planning Policy Framework (NPPF) states that planning policies and decisions 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'.*

10.46 Paragraph 189 of the NPPF states that *'great weight should be given to conserving and enhancing landscape and scenic beauty in ... National Landscapes which have the highest status of protection in relation to these issues.'*

10.47 In addition to the above, the Council's Cabinet, at its meeting on the 8th May 2025, resolved to *'endorse the recommendation of the report that the Cotswolds National Landscape Management Plan 2025-2030 be used:*

- 'as a material consideration in the determination of planning applications (where compatible with relevant Local Plan and national policy)'

10.48 The Cotswolds National Landscape Management Plan 2025-2030 includes a number of policies which are considered applicable to this application, including:

10.49 Policy CE1. Landscape

CE1.1 Proposals that have the potential to impact on, or create change in, the landscape of the Cotswolds National Landscape (CNL), should be delivered in a way that is compatible with and seek to further the conservation and enhancement of the landscape character of the location, as described by the CNL Board's Landscape Character Assessment and Landscape Strategy and Guidelines. There should be a presumption against the loss of key characteristics identified in the landscape character assessment.

CE1.2 Proposals that have a potential impact on, or create change in, the landscape of the CNL, should seek to further the conservation and enhancement of the scenic quality of the location and its setting, views, including those into and out of the National Landscape and visual amenity.'

10.50 Policy CE4: Local distinctiveness

'CE4.1 Proposals that are likely to impact on the local distinctiveness of the Cotswolds National Landscape (CNL) should be delivered in a way that is compatible with and seek to further the conservation and enhancement of this local distinctiveness. This should include:

- being compatible with the CNL Board's Landscape Character Assessment, Landscape Strategy and Guidelines, Local Distinctiveness and Landscape Change and any relevant position statement or guidance published by the Board.

- being designed to respect local settlement patterns, building styles, scale and materials in accordance with design guidance prepared by local planning authorities;

- using an appropriate colour of Cotswold limestone to reflect local distinctiveness.'

10.51 Policy CE5: Tranquillity

' CE5.1 Proposals that have the potential to impact on the tranquillity of the Cotswolds National Landscape (CNL) should be delivered in a way that is compatible with and seek to further the conservation and enhancement of this tranquillity, by seeking to avoid and where avoiding is not possible, minimise noise and other aural and visual disturbance.

CE5.3 Proposals that have the potential to impact on the tranquillity of the CNL should have regard to - and be compatible with - the CNL Board's Tranquillity Position Statement.'

10.52 Policy CE6: Dark Skies

' CE6.1 Proposals that have the potential to impact on the dark skies of the Cotswolds National Landscape (CNL) should be delivered in a way that is compatible with and seek to further the conservation and enhancement of these dark skies, by seeking to avoid and where avoiding is not possible, minimise lighting.

CE6.2 Measures should be taken to increase the area of dark skies in the CNL by removing and, where removal is not possible or appropriate, reducing existing sources of lighting.

CE6.3 Proposals that have the potential to impact on the dark skies or dark landscapes of the CNL should have regard to and be compatible with:

- The National Landscapes Board's Dark Skies and Artificial Light Position Statement.

- Cotswolds National Landscape Technical Lighting Design Guidance

- Best practice standards and guidance, in particular, that published by the Institution of Lighting Professionals. '

10.53 The application site and its surroundings are classified in the Cotswolds National Landscape Board's Landscape Character Assessment (LCA) as falling with Landscape Character Areas 15A Vale of Bourton Farmed Slopes. This in turn falls within Landscape Character Types 15 Farmed Slopes. With regard to landscape sensitivity, the LCA states the following in relation to Farmed Slopes:

'Rising from the lowlands, the elevated and sloping landform of the Farmed Slopes makes them a highly visible feature and therefore very sensitive to change, particularly where this would introduce built elements to the otherwise agricultural landscapes, or interrupt the strong patchwork patterns created by hedged pasture and arable fields.'

10.54 The LCA identifies *'Isolated development such as new single dwellings and conversion of farm buildings that might compromise rural landscape character and views to and from the Farmed Slopes, including farm buildings converted to residential use'* and the *Proliferation of equestrian establishments* as Local Forces for Change.

10.55 The LCA identifies the following as Potential Landscape Implications in respect of the above Landscape Character Type:

- *Visual intrusions introduced to the landscape*
- *Upgrading of minor roads and lanes and holloways in areas of new development and introduction of suburbanising features such as street lighting.*

- *Introduction of 'lit' elements to characteristically dark Farmed Slopes landscapes, forming a dark backdrop to the Pastoral Lowland Vale.*
- *Potential for glint from buildings.*
- *Erosion of distinctive dispersed settlement character of the Farmed Slopes.*
- *Appearance and proliferation of stables and 'white tape' field boundaries for horses and ponies*
- *Loss of tranquillity and sense of seclusion.*
- *Proliferation of stables and other visual clutter such as ribbon fences, jumps, horse boxes, shelters, manège and lighting associated with 'horsiculture'.*
- *Creation of paddocks by sub-dividing fields using non-characteristic field boundary treatments such as post and rail fence or ribbon fences.*
- *Deterioration in pasture quality and over grazing.*
- *Degraded appearance to the pastoral landscape.*
- *Pressure to provide new housing for staff and owners.*
- *Creation of surfaced tracks, new and enlarged field entrances and parking areas for cars and horse boxes etc.*
- *Increase in vehicle movements and roadside parking.*
- *Excessive use of local roads and paths by horses, in part due to no direct or close connections to bridleways etc.*

10.56 The Outline Landscape Strategies and Guidelines advises:

- *Avoid development that will intrude negatively into the landscape and cannot be successfully mitigated.*
- *Protect the undeveloped, open, unlit character of much of the Farmed Slopes*
- *Avoid conversion of isolated farm buildings*
- *Conserve the distinctive rural and dispersed settlement pattern.*
- *Restore existing stone farm buildings and structures in preference to new built development.*
- *Existing buildings should be carefully conserved and where converted to new uses buildings must retain their historic integrity and functional character. Sound conservation advice and principles must be sought and implemented*
- *Maintain the sense of openness and consider the impact of development proposals on views to and from the Farmed Slopes, including the impact of cumulative development.*
- *Control the proliferation of suburban building styles and materials.*
- *Landscaping schemes accompanying development should encourage the planting of appropriately sized native trees, shrubs and traditional fruit varieties, whilst discouraging large alien tree species such as eucalypts and conifers and inappropriate forms and cultivars of native species, particularly on fringes of open countryside*

- *Respect traditional position of agricultural buildings and their relationship to the surrounding land.*
- *The creation of horse paddocks in visually prominent locations such a roadside and hillside locations should be avoided.*
- *Where possible, existing buildings should be utilised and new stables and other structures kept to a minimum.*
- *Ensure all new ventures provide accommodation within new stable buildings and proposals for separate isolated housing should be resisted.*
- *New structures should be carefully sited and designed to minimize their impact on the landscape. Wherever possible they should be located close to existing buildings. They should be constructed from appropriate vernacular materials and should follow the form of the landscape, avoiding prominent skyline sites and slopes.*
- *Jumps, temporary fences and other equipment should be well maintained and removed when not in use.*
- *Any lighting should be designed to minimise light pollution, e.g. low level and directed downwards and fitted with timers.*
- *Oppose change of use for the 'keeping of horses' in visually prominent locations.*
- *A concentration of horse paddocks and associated structures in any one area can have a cumulative harmful impact on landscape character and should be avoided.*
- *Where pastures need to be subdivided into smaller paddocks, temporary electric fencing is better than more permanent structures and offers greater flexibility in pasture management. Post and rail should be avoided.*
- *Historic field boundaries, such as hedges, walls and fences should be maintained or extended, and new boundaries should match the local vernacular wherever possible.*

10.57 The existing site occupies a hillside location adjacent to the A424. With regard to public views of the site, it is noted that existing roadside trees and vegetation provide a good level of screening of the site when viewed from the A424. The aforementioned highway runs alongside the south-western edge of the site and is the closest public vantage point to the proposed development. The only part of the proposed development that would be readily visible from the A424 would be the new entrance, which would be located to the north-west of existing and proposed equestrian buildings.

10.58 With regard to medium range views, the site is well screened by existing vegetation from the network of Public Rights of Way that extend across agricultural land to the west and north-west of the application site. In addition, existing woodland provides a significant degree of screening when viewed from

Public Right of Way HMA6, which is located approximately 700m to the east of the application site.

10.59 With regard to longer range views, it is noted that the application hillside can be viewed from the MacMillan Way which runs to the west of the village of Maugersbury. The aforementioned footpath is located approximately 1.75km to the north of the application site. The stretch of footpath in question is lined by trees for part of its length. However, there are gaps in the vegetation which offer extensive views of the landscape to the south of Maugersbury/Stow-on-the-Wold. The site of the proposed equestrian development can be seen from the aforementioned footpath. However, it forms a minor component of a wider landscape view.

10.60 In addition to the above locations, the applicant's Landscape and Visual Impact Assessment (LVIA) has also assessed views from Public Right of Way HSL4 to the north of Lower Slaughter, which is located approximately 2.3km to the west of the application site and from Public Right of Way HSS12, which is located to the south of Lower Slaughter approximately 2.2km from the proposed development. As with views from the McMillan Way, the application site forms part of a wider landscape view and is partly screened by vegetation.

10.61 The LVIA identifies that the level of visual effect on the viewpoints set out above would range from moderate/minor adverse during the construction stage to minor adverse by Year 15 following the completion of the development. The LVIA also identifies that the impact on landscape character at Year 15 would be minor adverse. With regard to the effect of the proposed development on the Cotswolds National Landscape, the LVIA states:

'The overall residual effects on the CNL would be minor, adverse given that the available views of the Proposed Development from within the wider landscape would be partial or restricted in nature due to the intervening landform and layers of vegetation. The Proposed Development would be of similar character to the existing agricultural development which surrounds the Site and would convert existing built form already existing on Site. Mitigation measures in line with the published guidelines for the Farmed Slopes LCT have also been incorporated into the proposed scheme.'

10.62 In response to the content of the LVIA, Officers consider that the aforementioned report has assessed the site from a number of viewpoints which are considered to be representative of the views that are available of the site. The level of effect identified in the LVIA is also considered to be reasonable. Notwithstanding this, Officers consider that the site and its surroundings to be of high landscape value by virtue of their location within a National Landscape. Whilst the presence of the existing buildings and associated infrastructure has an impact on the character and appearance of the location, the site is situated

in a landscape which, by virtue of its designation, is considered to be of a high quality.

10.63 With regard to the existing development, it is noted that the existing equestrian facilities have a functional character and appearance which is considered to be consistent with the type of development often seen within a working rural landscape. In this respect, it is considered that the existing site does not appear as an incongruous or obtrusive feature within the landscape. In addition, the existing development is centred around historic 19th Century buildings thereby indicating that there has been a built presence on the aforementioned part of the site for many years. In this respect, the southern part of the application site has an equestrian character and appearance which influences the character and appearance of the landscape in this area.

10.64 With regard to the proposed scheme, it is noted that the new equestrian facilities would encroach onto an undeveloped field on a sloping parcel of land. The proposal would therefore result in an extension of built development beyond the existing yard area and into an area of open countryside. In addition, the proposal would require the re-profiling of part of the field and the creation of a new entrance drive which would extend up the hillside. Furthermore, the new equestrian buildings would be noticeably larger than any existing buildings associated with the current equestrian operation. In these respects, the proposal would have a material impact on the character and appearance of the CNL. However, it is also noted that the proposed scheme would involve the removal of a number of equestrian buildings and associated development such as a manege. Moreover, the proposed facility would be located lower down the hillside than the existing buildings and associated development. The re-profiling of the land would also result in the proposed buildings being set into part of the hillside rather than rising up the hillside in a stepped fashion. The proposed development would therefore be seen against a backdrop of rising land rather than the skyline. The proposed buildings would also have a functional, utilitarian character and appearance which is considered to be consistent with their purpose, and which is consistent with the type of working buildings seen across the District.

10.65 With regard to the duty to *'further the purpose of conserving and enhancing the natural beauty'* of the CNL, it is evident that the character and appearance of the designated landscape is not just defined by open countryside but also by the setting of buildings, farmsteads and settlements within the landscape and the manner in which they relate to it. Equestrian development is a common feature within the designated landscape. In the case of this proposal, it is noted that the character and appearance of this part of the CNL is already heavily influenced by the existing equestrian operation. Whilst the proposed scheme would involve the introduction of new development into the landscape, it would

also remove a number of existing buildings and supporting infrastructure and introduce landscape restoration. The proposal would include measures that mitigate its landscape and visual impact. It is considered that the proposal would not appear as an incongruous or obtrusive form of development and that it would represent a type of development which is often seen within a working rural environment. In this regard, it is considered that the proposal reasonably addresses the requirements set out in the aforementioned duty.

10.66 Officers have engaged a Landscape consultant to provide an independent assessment of the submitted information and the proposed development. The Landscape consultant initially requested further information in relation to the re-profiling of the land and further clarification regarding landscape and visual effects and sensitivity. The applicant has provided additional information in response to this request. In response, the Landscape consultant has advised:

10.66.1 ' The updated LVA and site sections clarify that the proposed stable complex would be set on a cut-in platform, with buildings positioned lower than the existing yard and below the skyline in longer views. This approach is acknowledged as a positive response to landscape context and earlier advice.

10.66.2 The submitted sections indicate that the development would require significant re-grading of the northern field parcel, including the introduction of a retaining structure, with some localised increase in height around the veteran tree root protection area, where ground levels are to remain unaltered. While the intention to minimise the height and visual presence of the retaining structure is noted, the associated earthworks would nonetheless result in a permanent alteration to natural landform, which forms part of the CNL's special qualities.

10.66.3 The LVA now more clearly acknowledges effects on the Farmed Slopes landscape, although the development would still introduce a more developed and utilitarian character into an area currently experienced as open pasture. These effects are localised but adverse in nature.

10.66.4 The updated LVA better recognises the site's location within the Cotswolds National Landscape and its high landscape value. However, the proposals would still give rise to localised harm to the National Landscape, principally through:

- *Landform modification and soils;*
- *Extension of built form northwards; and*
- *Introduction of engineered elements associated with the access, earthworks and retaining structures.*

10.66.5 These impacts do not amount to significant effects long term but still require careful control to ensure compliance with policy and the statutory duty to conserve and enhance the CNL.

Conclusion and Recommendations

10.66.6 The revised submission provides greater detail regarding impacts, levels and earthworks. The proposal would still result in adverse effects on landscape character, landscape features and the Cotswolds National Landscape, but these effects are considered acceptable, subject to appropriate conditions.'

10.67 The requested conditions include those relating to a landscape scheme, Landscape and Ecological Management Plan, external lighting and materials. These have been included as part of the list of proposed conditions.

10.68 With regard to tranquillity and dark skies, the proposed equestrian use is considered not to generate a level of noise or disturbance that would have an adverse impact on the tranquillity of the area, especially when the established use of the site is taken into account. With regard to dark skies, the proposed equestrian buildings would be subject to very limited night time activity and it is considered that their design would not generate significant light spill. A condition can be attached to a decision requiring details of external lighting to be agreed. With regard to the barn conversions, the existing buildings are relatively modest in size and occupy a discreet part of the site. It is considered that their residential use would not have an adverse impact on dark skies.

10.69 With regard to the conversion of the existing barns, it is noted that the existing buildings are not readily visible from public view and sit within an established farmyard area. The proposed dwellings would retain the character and appearance of functional agricultural/equestrian buildings. The proposals would not result in a material enlargement of the existing buildings and their presence in landscape and visual terms would largely remain as existing. The barns are well screened from public view by existing vegetation and occupy a relatively discreet location within the application site.

10.70 It is considered that the proposed development accords with Local Plan Policies EN1, EN4 and EN5 and Section 15 of the NPPF.

Major Development

10.71 In determining this application, it is necessary to assess whether the proposal constitutes major development for the purposes of paragraph 190 of the NPPF. This is distinct from the categorisation of major development set out in the Town and Country Planning (Development Management Procedure) (England) Order 2015, which is based solely on the size of a development. With regard to paragraph 190, footnote 67 of the NPPF states that whether a proposal is *'major*

development' is a matter for the decision maker, taking into account its nature, scale and setting and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.'

10.72 Paragraph 190 states:

'planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such an application should include an assessment of:

i) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;

ii) the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and

iii) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that can be moderated'.

10.73 In the case of this proposal, the submitted scheme would be located adjacent to an existing, established equestrian development and on land which can already be used for equestrian purposes. The proposed development would therefore be located in an area that already has an equestrian character and appearance. Furthermore, the current proposal seeks to remove a number of equestrian buildings and associated development and introduce new landscaping. In addition, the proposed scheme is considered unlikely to generate a significant increase in vehicle movements or have a greater impact on the tranquillity of the designated landscape than the established use. Whilst the scheme would result in the development of a greenfield site within the CNL, the area in question has a visual and physical connection with existing built development. In addition, the landscape and visual impact of the scheme is considered to be localised. When assessed against the requirements of Footnote 67 of the NPPF, it is considered not to have a significant adverse impact on the purposes for which the area has been designated. The proposal is therefore considered not to constitute major development in this respect.

(d) Access and Highway Safety

10.74 The proposed scheme would involve the creation of a new vehicular entrance onto the A424, which runs to the south-west of the application site. The existing site entrance lies to the south-west of the existing farmhouse and also opens onto the A424. However, it is narrow and affords very limited visibility in both directions along the aforementioned highway. When this is combined with the need for larger slow moving vehicles such as horse boxes, delivery vehicles and

trailers to enter and leave the site, the current arrangements are considered to be unsafe in terms of highway safety. As a consequence, the applicant is seeking to create a new dedicated vehicular entrance to serve the new equestrian facility at a point on the A424 approximately 330m to the north-east of the existing entrance. The existing entrance would be retained for use by the existing farmhouse and the 2 proposed dwellings.

10.75 The following policies and guidance are considered applicable to this proposal:

10.76 Local Plan Policy INF4 Highway Safety

Development will be permitted that:

a. Is well integrated with the existing transport network within and beyond the development itself, avoiding severance of communities as a result of measures to accommodate increased levels of traffic on the highway network;

b. Creates safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoids street clutter and where appropriate establishes home zones;

c. Provides safe and suitable access and includes designs, where appropriate, that incorporate low speeds;

d. Avoids locations where the cumulative impact on congestion or other undesirable impact on the transport network is likely to remain severe following mitigation; and

e. Has regard , where appropriate, to the Manual for Gloucestershire Streets or any guidance produced by the Local Highway Authority that may supersede it.

10.77 Paragraph 116 of the NPPF states *'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.'*

10.78 This application is accompanied by a Transport Statement (TS) which states that

10.78.1 *'At present, the existing access arrangement does not allow for efficient access and egress of large delivery vehicles such as articulated HGVs and tractor/ trailer combinations, by virtue of insufficient width and internal site layout. To accommodate these vehicles and manoeuvres, temporary traffic management is relied upon in the form of banksmen, who direct larger vehicles to/from the A424. It is understood that in some of these*

instances, such large delivery vehicles take up the full width of the A424 carriageway or are required to load and unload directly from the A424.

10.78.2 It is also observed that visibility at the existing site access junction is restricted by the alignment of the A424 at this location, as well as vegetation present along the eastern side of the carriageway.'

10.79 Speed surveys undertaken in connection with this application have recorded 85th percentile average speeds of 54mph northbound and 50.3mph southbound adjacent to the existing site entrance. It is evident that vehicles utilising the A424 pass the site entrance at relatively high speed, which exacerbates the existing issues relating to the narrow width of the site entrance and its restricted visibility.

10.80 The proposed new entrance road would have a carriageway width of 7.5m and would incorporate a 10m curved radii where it adjoins the A424. In addition, the new entrance can provide the requisite visibility of 2.4m by 215m in both directions. Swept path plans also demonstrate that vehicles would be able to enter the carriageway without causing the obstructions which are currently present at the existing entrance. Whilst vehicle speeds are higher along this part of the A424 (57.9mph northbound and 56.8mph southbound), the improvements to access visibility, the purpose designed nature of the new entrance and the ability for vehicles to enter and leave the site in a more efficient manner are all considered to result in a betterment in highway safety terms. Due to existing topography and bends in the road, the proposed entrance point is the closest safe point to the existing entrance.

10.81 The existing entrance would be used in connection with the existing farmhouse and proposed dwellings. However, the amount and type of traffic generated by the aforementioned would be lower than the established use of the site and would also generate fewer larger vehicles. It is considered that the proposed arrangements would be an improvement when compared to the existing situation.

10.82 The proposed development involves the relocation and modernisation of existing equestrian facilities on the site. It would not involve the creation of an entirely new equestrian operation in the countryside. The proposal is considered not to generate a material increase in vehicle movements when compared to the existing operation. In this respect, the proposal is considered not to have an adverse impact on the operation of the local highway network.

10.83 Gloucestershire County Council Highways raises no objection to the application.

10.84 It is considered that the proposed access arrangements are acceptable and in accordance with Local Plan Policy INF4 and guidance in paragraph 116 of the NPPF.

10.85 The proposed equestrian development would provide 19 parking spaces. In addition, a minimum of 2 parking spaces would be available for each dwelling. It is considered that the level of parking would be acceptable and in accordance with Local Plan Policy INF5.

(e) Biodiversity

10.86 The application site is occupied by a number of barns and stables. In addition, the wider site contains trees, hedgerows and areas of grassland. The site is considered to contain a number of habitats that are attractive to a range of protected species. The applicant has submitted a Bat Survey Report and an Ecological Impact Assessment & Biodiversity Net Gain Assessment report with this application.

10.87 The following Local Plan policy is considered applicable to this proposal:

Policy EN8 Biodiversity and Geodiversity: Features, Habitats and Species

1.Development will be permitted that conserves and enhances biodiversity and geodiversity, providing net gains where possible.

2.Proposals that would result in significant habitat fragmentation and loss of ecological connectivity will not be permitted.

3.Proposals that reverse habitat fragmentation and promote creation, restoration and beneficial management of ecological networks, habitats and features will be permitted, particularly in areas subject to landscape-scale biodiversity initiatives. Developer contributions may be sought in this regard.

4.Proposals that would result in the loss or deterioration of irreplaceable habitats and resources, or which are likely to have an adverse effect on internationally protected species, will not be permitted.

5. Development with a detrimental impact on other protected species and species and habitats "of principal importance for the purpose of conserving biodiversity"(41) will not be permitted unless adequate provision can be made to ensure the conservation of the species or habitat.

10.88 With regard to bats, the Bat Survey Report states that bat surveys recorded 2 common pipistrelle bats using the stone barn. The bat report states that the aforementioned barn is being used as a day roost. No evidence of bats was found in the other buildings on the site. As the proposed scheme would result in the loss of a bat roost, the applicant will be required to obtain a separate European Protected Species licence from Natural England prior to undertaking works that may affect the roost. The bat report recommends the installation of 2 bat boxes on the site to offset the loss of the day roost.

10.89 With regard to the site in general, no nesting birds or other protected species were identified on the application site. The proposed equestrian buildings would be located on an area of grassland that is of low ecological value. Existing trees and hedgerows would be retained for the most part, aside from the need to remove some roadside vegetation to facilitate the new vehicular entrance. It is considered that this loss would be offset by new tree and hedgerow planting across the site.

10.90 The Council's Biodiversity Officer has reviewed the submitted information and states:

10.90.1 ' Habitats - The veteran tree on site is due to be retained. A small length of hedgerow which has been identified as a habitat of principal importance under Section 41 of the NERC Act 2006 will be lost to facilitate the creation of a new access. I consider that the creation of additional hedgerows on site will provide adequate compensation for this small loss. The site is adjacent to a parcel of woodland which appears on the priority habitats inventory as deciduous woodland, with works proposed approximately 10m from this woodland. As no measures to safeguard this priority habitat have been provided within the report, a woodland protection plan should be secured by condition once all other biodiversity issues have been resolved.

10.90.2 Bats - Section 3.3.1 states that previous bat surveys undertaken by Windrush Ecology in July 2024 recorded that building 1 supported a day roost of small numbers of Common Pipistrelle bats. Section 4.2.3.1 recommends that the works to building 1 will need to be undertaken under a mitigation licence from Natural England (BMCL) as the development will result in the loss of the identified roost.

10.90.3 Birds - I agree with the assessments and recommendations within the report pertaining to birds.

10.90.4 Amphibians and reptiles - I agree with the assessment and recommendations pertaining to amphibians and reptiles contained within the report.

10.90.5 Enhancements for biodiversity - I am pleased to see the proposed inclusion of enhancement features, including integrated provision, for bats and birds. Although some recommendations have been provided within the report, these are not finalised and therefore, a condition to secure finalised details of biodiversity enhancements will be recommended once all other biodiversity issues are resolved.'

10.91 Due to the fact that the proposed development could potentially affect European protected species, it is necessary to have regard to ODPM Circular 06/2005 (para 116) and the Conservation of Habitats and Species Regulations

2017 (as amended), and consider the proposal against the 3 'derogation' tests, as set out in Regulation 55 :

a) The preserving of public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment:

b) There must be no satisfactory alternative:

c) The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range:

10.92 In the case of this proposal, it is noted that the conversion of stone barn has the potential to secure the long term viable use of a non-designated heritage asset and to provide a new dwelling. It also forms part of a scheme to deliver new housing and to enable the growth of an existing rural business, which is considered in the public interest. It is not possible to undertake the conversion works elsewhere and the proposed scheme proposes mitigation measures which will maintain the favourable conservation status of the protected bat species. It is considered that the proposal addresses the requirements of the above legislation.

10.93 With regard to Biodiversity Net Gain (BNG), the applicant has submitted additional baseline information in response to comments from the Biodiversity Officer. In response to this additional information, the Biodiversity Officer advises that the *'updated and amended BNG information (uploaded 22nd December 2025) sufficiently addresses my previous concerns. The baseline is considered to be accurate, and the development is likely to deliver at least 10% on-site BNG across all required habitats. It should be noted that as a major development, a S106 agreement will be required in order to secure monitoring fees for on-site habitats.'*

10.94 It is considered that the proposed development can be undertaken without having an adverse impact on protected species and that suitable enhancements, including the delivery of BNG, can be achieved secured. It is considered that the proposal accords with Local Plan Policy EN8 and guidance in Section 15 of the NPPF.

(f) Flooding and Drainage

10.95 The site is located within Flood Zone 1 which is the lowest designation of Flood Zone and one in which new development of the type proposed can be acceptable in principle.

10.96 This application is accompanied by a Flood Risk Assessment (FRA). The FRA states that the site has moderate permeability, with the result that reliance on on-site infiltration would not necessarily be a practical option on the site. As such, on-site attenuation could be utilised which would enable surface water to be stored before being released at a controlled rate to nearby water courses.

10.97 Gloucestershire County Council in its role as Lead Local Flood Authority (LLFA) has assessed the application. In its response dated the 5th November 2025, the LLFA advised:

'Surface Water Management

Runoff Destination

10.97.1 Two strategies have been submitted; one based on infiltration and another discharging to a watercourse that originates on site before joining the watercourse adjacent to the A424. No infiltration tests have been carried out so the former strategy has not been assessed, however, it's deemed unlikely to be feasible considering the bedrock geology is mudstone and the soil suggests it has impeded drainage. Discharging to the watercourse is the next preferred option in Standard 1 of the National Standards for Sustainable Drainage Systems.

Discharge rate and volume

10.97.2 The discharge rate has been limited to 6.6 l/s, which is approximately equal to the greenfield runoff rate for QBar and will form the strategy for managing runoff volume.

Sustainable Drainage System (SuDS) strategy and indicative plan

10.97.3 SuDS have been incorporated into the strategy with permeable paving on the hard standing areas and an underground storage tank. The FRA suggests that there will be sufficient attenuation for a 1% Annual Exceedance Probability (AEP) rainfall event plus 40% for climate change (1197.19m3), however, this could be significantly underestimated as the UK SuDS website estimates 2051 m3 is required. This should be clarified to demonstrate the strategy meets Standard 3 of the National Standards.

10.97.4 The SuDS strategy also doesn't appear to meet Standard 2, which is to manage everyday rainfall without the first 5mm producing runoff by providing interception. The standard states that lined permeable paving that is draining adjacent impermeable areas will not provide interception so won't meet the standard. Underground storage tanks will not provide it either.

10.97.5 The permeable paving will provide sufficient management of water quality, however, the strategy does not provide any amenity or biodiversity

benefits. Above ground SuDS will provide this and will generally be easier to maintain. Maintenance could be a future issue because the two dwellings could be draining through a private surface water system on third party land. There would need to be provisions in place for them to be able to fix any issues with the drainage that may impact them.

Climate change

10.97.6 As described above, subject to there being sufficient storage available, climate change has been included in the assessment at a value of 40%. This is in line with the Environment Agency's latest estimates.

Exceedance flow plan

10.97.7 The direction and routes that water flows in rainfall events that exceed the design of the drainage will depend on the final topography of the site and can be supplied with a detailed design condition.

LLFA Recommendation

10.97.8 It appears that the amount of storage being provided could be significantly underestimated and the strategy will not provide sufficient interception. These could have a significant impact on the drainage strategy, and the site layout so should be resolved prior to approval.'

10.98 In response to the above comments, the applicant has provided additional information. The LLFA has advised:

'The latest Flood Risk Assessment (January 2026; Issue 2) includes some changes to the SuDS Strategy that will now ensure it will meet the Standards 2 and 3 of the National Standards for Sustainable Drainage Systems. These changes include lining the permeable paving so that it will allow infiltration of the first 5mm of everyday rainfall (meeting Standard 2) and further MicroDrainage calculations (showing it will meet Standard 3).' The LLFA now raises no objection.

10.99 It is considered that the proposal can be undertaken without having an adverse impact on flooding and drainage in accordance with Local Plan Policy EN14 and guidance in Section 14 of the NPPF.

Other Matters

10.100 The application site is located to the north-east of a Grade II listed building (Wyck Hill Lodge). Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that when considering whether to grant planning permission for development which affects a listed building or its setting, the Local Planning Authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural

or historic interest which it possesses. Considerable weight and importance must be given to the aforementioned legislation. In this instance, the listed building is separated from the site by the A424. Existing roadside vegetation provides a degree of screening of the site when viewed from the heritage asset. Furthermore, the proposed equestrian development would be located further from Wyck Hill Lodge than the existing development. It is considered that the aforementioned part of the proposed development would not have an adverse impact on, or cause harm to, the setting of the listed building. It is also considered that the conversion of the existing barns to dwellings would not cause harm to the setting of the aforementioned building. The barns in question would retain an agricultural character and would be screened by existing vegetation. There would therefore be very little visual or physical interconnectivity between the sites in this respect. It is considered that the proposal accords with Local Plan Policy EN10 and guidance in Section 16 of the NPPF.

10.101 The existing farmhouse on the application site is considered to constitute a non-designated heritage asset by virtue of its age, historic and architectural interest. The proposed scheme would remove a number of modern buildings from the vicinity of the farmhouse, thereby freeing up space around the dwelling and returning it to an arrangement that is closer to its origins. In addition, the distance between the farmhouse and the proposed equestrian facility, combined with the set down position of the new equestrian development, are considered not to impact on the setting of the dwelling. It is considered that the proposal would not have an adverse impact on the significance of the non-designated heritage asset.

10.102 With regard to noise, odour and disturbance, it is noted that the proposed equestrian development would be located further from neighbouring dwellings than the existing operation. In addition, the new entrance would reduce the number of large vehicles entering the site opposite Wyck Hill Lodge, thereby reducing disturbance from larger vehicles. The applicant has also provided details relating to the storage of manure and its location adjacent to the proposed new equestrian buildings. The Council's Air Quality Officer is satisfied with the proposed arrangements given their location and distance from residential properties. It is considered that the proposed development would not have greater impact in relation to the respective matters than the established use. The proposal is considered to accord with Local Plan Policy EN15.

10.103 Each new dwelling would be provided with an adequate area of outdoor amenity space in accordance with guidance in the Cotswold Design Code.

10.104 Icomb Camp Scheduled Ancient Monument (SAM) is located approximately 420m to the east of the site. The proposed equestrian development would be located further from the SAM than existing development. Having regard to the distance between the application site and the SAM, existing vegetation and topography, it is considered that there is no physical or visual interconnectivity between the 2 sites. Historic England has offered no comments in relation to the proposal. It is considered that the proposal would not have an adverse impact on the setting of the SAM having regard to Local Plan Policy EN10 and guidance in Section 16 of the NPPF.

10.105 With regard to archaeology, the applicant has submitted a detailed archaeological report, which includes the results of a field trenching. The report has been assessed by GCC Archaeology which states:

10.105.1 'I advise that I have checked the proposed development site against the County Historic Environment Record, and the proposed development is located in an area of known archaeological potential, although nothing was previously recorded within the red line area apart from former ridge and furrow earthworks. The applicant has submitted a comprehensive set of reports dealing with archaeological matters. A Heritage Assessment (John Moore Heritage Services, June 2025) details the known archaeology in the vicinity, including the Scheduled Monument of Icomb Camp and nearby cropmarks recorded from aerial photographs, suggestive of Later Prehistoric or Roman settlement. Geophysical survey (Sumo Geosurveys, 2nd June 2025) suggested that the site contained a possible rectilinear enclosure, itself containing a smaller circular enclosure. A number of responses indicative of burnt or fired material were also recorded. Due to the geophysical results a limited programme of trial trenching (John Morre Heritage Services, October 2025) was recommended and this established that the anomalies represented geological variation and the only features recorded were found to be of natural or modern origin.

10.105.2 In my view there is a low risk that significant archaeological remains will be adversely affected by this development proposal. Therefore, I recommend that no archaeological investigation or recording need be undertaken in connection with this scheme. '

10.106 With regard to trees, the Council's Tree Officer states:

10.106.1 'The site contains a number of trees 3 of which are A graded, of which 2 are veterans.

10.106.2 The proposal requires the removal of 8no low quality trees, primarily at the location of the new entrance. The loss of the trees will be adequately mitigated by new plantings identified in landscape masterplan

drawing number 1640-L- D-PL-200 although final numbers and locations would need to be agreed as would an establishment and aftercare plan.

10.106.3 A small amount of facilitation pruning to B grade trees has been identified. The works are minor in nature and given the species profile of trees to be pruned will not be detrimental long term. Works must be to BS 3998 as per section of 3.19 of Tree Frontiers ARBORICULTURAL IMPACT ASSESSMENT - Document Ref: 294294-678-RPT-AIA.

10.106.4 Surfacing removal has been identified as having a potential negative impact on up to 7 trees. Sections 6.17-6.20 of Tree Frontiers ARBORICULTURAL IMPACT ASSESSMENT - Document Ref: 294294-678-RPT-AIA (AIA) states methodology of working to minimise impacts and should be adhered to.

10.106.5 5 trees have been identified as having the potential to be impacted by construction activities through ground compaction. Ground protection positioning is set out in Tree Protection Plan 294294-678-DRW-TPP and must be adhered to for the duration of construction activities. The type of protection has been identified in section 13.18-13.19 of the AIA. Protection for retained trees has been accounted for in Tree Protection Plan - 294294-678-DRW-TPP including larger root protection areas and construction exclusion zones for T25 and T27, levels should remain unchanged within RPAs.

10.106.6 Permanent surfacing within RPAs has been addressed within sections 13.21 - 13.26 of AIA. Cellular confinement system with no dig kerbing solutions have been identified.'

10.107 Subject to the attachment of conditions addressing the above matters, the Tree Officer raises no objection to the application. It is considered that the proposal can be undertaken in accordance with the requirements of Local Plan Policy EN7.

10.108 This application is liable for the Community Infrastructure (CIL) and there will be a CIL charge payable. Section 143 of the Localism Act 2011 states that any financial sum that an authority has received, will, or could receive, in payment of CIL is a material 'local finance consideration' in planning decisions.

10.109 In addition to the above, it is noted that the Government published a draft version of the NPPF on the 16th December 2025. The consultation period for the aforementioned document expires on the 10th March 2026 and it is anticipated that a final version of the NPPF will be released in Spring 2026. Whilst the draft NPPF is a consultation document, it is considered that the proposed policies within it are a material consideration and must be given a degree of weight at the present time.

10.110 It is noted that draft Policy S3 states that decisions on development proposals should apply a presumption of favour of sustainable development. It goes on to state that development proposals that accord with an up-to-date development plan and the decision making policies in the draft NPPF should be approved without delay.

10.111 Draft Policy S5: Principle of development outside settlements states that only certain forms of development should be approved outside settlements. It states that these developments should be approved, unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework. The following is identified as one of the forms of development considered to be acceptable in principle outside a settlement:

'b. Development for rural businesses and services, including tourism, where a location outside settlements is shown to be necessary; '

10.112 The current proposal relates to an established rural business outside a settlement. The equestrian nature of the development means that it has to operate outside of a settlement. The proposal is therefore considered to represent a form of development that can be acceptable outside a settlement.

10.113 In addition, draft Policy E4: Rural business development states that the *'sustainable growth of businesses in rural areas should be supported, including through:*

a. The conversion of existing buildings and well-designed new buildings;

b. The development and diversification of agricultural and other land based businesses; … '

10.114 The proposed development is considered to accord with the above criteria.

10.115 With regard to new housing in the countryside, criterion 3 of Policy S5 states that *'development proposals comprising isolated homes, which are those lying outside settlements or groups of houses, should not be approved other than in accordance with policy HO11.'* Policy HO11 is broadly consistent with paragraph 84 of the existing NPPF, although reference to *'optimal viable use'* is replaced by *'appropriate enabling development to secure the future of heritage assets..'* The conversion of the stone barn to a dwelling would represent a form of enabling development that would secure the future of the barn as a heritage asset.

10.116 It is noted that Policy HE6 also requires substantial weight, rather than great weight, to be given to the conservation of heritage assets such as listed buildings. For the reasons set out above, it is also considered that the proposal would not cause harm to the setting of the nearby listed building.

10.117 It is noted that the draft Policy N4 advises that *'substantial weight should be placed on the importance of conserving and enhancing the natural beauty...'* of National Landscapes. This differs from the great weight set out in the current NPPF.

10.118 Draft Policy N4: Protected Landscapes states:

> *' 1. Development proposals within Protected Landscapes should be limited in scale and extent and sensitively located and designed to avoid harm to their statutory purposes and special qualities. Substantial weight should be placed on the importance of conserving and enhancing the natural beauty of these areas, and to conserving and enhancing wildlife and cultural heritage in National Parks and the Broads.'*

10.119 The Cotswolds National Landscape is classed as a Protected Landscape.

10.120 For the reasons set out earlier in this report it is considered that the proposal would conserve and enhance the natural beauty of the CNL and addresses the requirements of Policy N4.

10.121 With regard to other matters such as sustainable development, highway safety, traffic generation, flooding, drainage, design, contamination, pollution, residential amenity and biodiversity, the policies in the draft NPPF remain broadly consistent with those in the current document.

10.122 This application is considered not to conflict with policies in the draft NPPF.

11. Conclusion

11.1 It is considered that the proposed scheme would enable the sustainable re-development and modernisation of an established rural business. It would also help to secure the long term viable use of a non-designated heritage asset, improve highway safety and contribute in a positive way to the Council's supply of housing land. Whilst the proposal would result in an encroachment of development onto a greenfield site in the Cotswolds National Landscape, it also noted that the scheme would introduce new landscaping and biodiversity enhancements, which would help to mitigate the impact of the proposal on the character and appearance of the Cotswolds National Landscape. On balance, it is considered that the benefits of the proposal outweigh its impacts. It is therefore recommended that the application is granted permission subject to the completion of a S106 legal agreement covering Biodiversity Net Gain.

12. Proposed Conditions:

1. The development shall be started by 3 years from the date of this decision notice.

Reason: To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2. The development hereby approved shall be carried out in accordance with the following drawing number(s):

24165-0201 01, 24165-0203 03, 24165-0205 02, 24165-0401 02, 24165-0402 02, 24165-0403 00, 24165-0404 02, 24165-0411 00, 24165-0412 02, 24165-0413 02, 24165-0431 00, 24165-0432 01, 24165-0441 02, 1640-L-D-PL-200 V2,

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

3. Within 6 months of the first use of the new equestrian facilities hereby approved, all existing buildings, riding arenas, equestrian facilities and structures other than those shown on drawing no. 24165-0203 03 shall be permanently removed from the application site.

Reason: In order to prevent the retention of development that is to be replaced with the new equestrian facilities thereby preventing the overdevelopment of the site to the detriment of the character and appearance of the Cotswolds National Landscape which would be contrary to Local Plan Policies EN4 and EN5 and guidance in Section 15 of the National Planning Policy Framework.

4. The occupation of the mobile home shall be limited to a person(s) solely or mainly working or last working in the locality in equestrian activities, or a widow or widower of such a person and to any resident dependants.

Reason: The site is located in a rural area wherein there is a presumption against new build open market residential development. In accordance with Cotswold District Local Plan Policies DS4 and H5 and guidance set out in Paragraph 84 of the National Planning Policy Framework permission is granted only because the accommodation is required to house persons employed in an equestrian business where there is a demonstrated essential need.

5. The mobile home hereby approved shall be permanently removed from the application site within three months of the cessation of its use by a person(s) solely or mainly working or last working in the locality in equestrian activities, or a widow or widower of such a person and to any resident dependants.

Reason: The application site is located in an isolated location in the countryside. Residential development in such locations can only be supported if there are special circumstances such as the essential need for a rural worker to live close to their place of work. There is no justification for the retention of the mobile home on the site following the cessation of its use as equestrian worker's accommodation. This

condition is attached having regard to Local Plan Policy H5 and Paragraph 84 of the National Planning Policy Framework.

6. Prior to the use/occupation of the development hereby approved, a comprehensive landscape scheme shall be approved in writing by the Local Planning Authority. It must show details of all planting areas, tree and plant species, numbers and planting sizes. The proposed means of enclosure and screening should also be included, together with details of any mounding, walls and fences and hard surface materials to be used throughout the proposed development.

Reason: To ensure the development is completed in a manner that is sympathetic to the site and its surroundings in accordance with Cotswold District Local Plan Policies EN2. EN4 and EN5.

7. The entire landscaping scheme shall be completed by the end of the first full planting season (1st October to the 31st March the following year) immediately following the completion of the development or the site being brought into use, whichever is the sooner.

Reason: To ensure that the landscaping is carried out and to enable the planting to begin to become established at the earliest stage practical and thereby achieving the objective of Cotswold District Local Plan Policies EN2, EN4 and EN5.

8. Any trees or plants shown on the approved landscaping scheme to be planted or retained which die, are removed, are damaged or become diseased, or grassed areas which become eroded or damaged, within 5 years of the completion of the approved landscaping scheme, shall be replaced by the end of the next planting season. Replacement trees and plants shall be of the same size and species as those lost, unless the Local Planning Authority approves alternatives in writing.

Reason: To ensure that the planting becomes established and thereby achieves the objective of Cotswold District Local Plan Policies EN2, EN4 and EN5.

9. Notwithstanding the provisions of Schedule 2 Part 1 Class A and Class E of the Town and Country Planning (General Permitted Development) (England) Order 2015, or any other statutory instrument amending or replacing it, no extensions shall be added to the dwellings hereby approved or, domestic outbuildings erected or constructed within the application site, other than those permitted by this Decision Notice.

Reason: In order to protect the rural character and appearance of the site which is located within the Cotswolds National Landscape and in order to ensure that the approved accommodation remains proportionate to the essential needs of the business in accordance with Cotswold District Local Plan Policies EN2, EN4, EN5, EN12 and H5.

10. All tree works, including felling and facilitation pruning, identified in Tree Frontiers - ARBORICULTURAL IMPACT ASSESSMENT - 294294-678-RPT-AIA Version 04 shall be carried out in accordance with sections 13.6 - 13.9. of the aforementioned document.

Reason: To ensure works are carried out in a manner that minimises harm to trees during development in accordance with Local Plan Policy EN7.

11. Tree protection fencing shall be undertaken in accordance with the approved details specified in Tree Frontiers - Tree Protection Plans - 294294-678-DRW-TPP 03 before any development including demolition, site clearance, materials delivery or erection of site buildings, starts on the site. The approved tree protection measures shall remain in place until the completion of development or unless otherwise agreed in writing with the Local Planning Authority. Excavations of any kind, alterations in soil levels, storage of any materials, soil, equipment, fuel, machinery or plant, site compounds, latrines, vehicle parking and delivery areas, fires and any other activities liable to be harmful to trees and hedgerows are prohibited within any area fenced, unless agreed in writing with the Local Planning Authority.

Reason: To ensure adequate protection measures for existing trees/hedgerows to be retained, in the interests of visual amenity and the character and appearance of the area in accordance with Local Plan Policies EN4, EN5 and EN7.

12. All excavations and surface treatments shall be carried out in accordance with the approved details as set out in sections 13.21-13.26 of the Tree Frontiers Arboricultural Impact Assessment ref 294294-678-RPT-AIA Version 04 and Tree Protection Plans - 294294-678-DRW-TPP 03.

Reason: To ensure works are carried out in a manner that minimises harm to above and below ground parts of trees during development in accordance with Local Plan Policy EN7.

13. In the event that contamination is found at any time when carrying out the approved development, it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with the requirements of Environment Agency's Land Contamination: Risk Management (LCRM), and where remediation is necessary a remediation scheme must be prepared, to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property, and which is subject to the approval in writing of the Local Planning Authority.

Reason: To prevent pollution of the environment in the interests of the amenity and public health in accordance with Local Plan Policy EN15.

14. No below or above ground development shall commence until a Detailed Site Waste Management Plan or equivalent has been submitted to and approved in writing

by the Local Planning Authority. The Detailed Site Waste Management Plan must identify:

i) the specific types and amount of waste materials forecast to be generated from the development during site preparation & demolition and construction phases;

ii) the specific measures to be employed for dealing with this material so as to: - minimise its creation, maximise the amount of reuse and recycling on-site;

iii) maximise the amount of off-site recycling of any wastes that are unusable on-site; and

iv) reduce the overall amount of waste sent to landfill. In addition, the Detailed Site Waste Management Plan must also set out the proposed proportions of recycled content that will be used in construction materials.

The Detailed Site Waste Management Plan shall be fully implemented as approved unless the local planning authority gives prior written permission for any variation.

Reason: To ensure the effective implementation of waste minimisation and resource efficiency measures in accordance with adopted Gloucestershire Waste Core Strategy: Core Policy WCS2 - Waste Reduction and adopted Minerals Local Plan for Gloucestershire Policy SR01. It is important that these details are agreed prior to the commencement of development as any on-site works could have implications for waste disposal.

15. No above-ground development shall commence until full details of the provisions to be made for facilitating the management and recycling of waste generated during the use and occupation of the development hereby permitted have been submitted to and approved in writing by the Local Planning Authority and the development shall adhere to the approved details.

Reason: To ensure the effective implementation of waste minimisation and resource efficiency measures in accordance with adopted Gloucestershire Waste Core Strategy: Core Policy WCS2 - Waste Reduction.

16. Prior to the commencement of development of the new equestrian facilities hereby permitted, the new entrance onto the A424 shall be constructed to at least basecourse level in accordance with the details shown in drawing PC7514_001 (in Transport Statement Ref: PC6526-RHD-XX-WF-RP-CY-0001). Within 3 months of the first use of the new equestrian facilities, the entrance shall be completed fully in accordance with the aforementioned drawing and be retained in accordance with the approved details for the lifetime of the development.

Reason: In order to ensure that the development is provided with a safe means of access and egress to and from the A424 in the interests of highway safety and in accordance with Local Plan Policy INF4.

17. The new dwellings hereby permitted shall not be occupied until the existing equestrian buildings, associated manege and equestrian infrastructure have been removed from the site in accordance with the details shown on drawing no. 24165-0203 03.

Reason: In order to ensure that future occupiers of the dwellings hereby permitted are not subjected to unacceptable levels of noise, odour or general disturbance in accordance with Local Plan Policy EN15 and so the development would not result in the intensification of a substandard access, in the interests of highway safety and in accordance with Local Plan Policy INF4.

18. The development shall not commence until a 30-year Habitat Monitoring and Management Plan (HMMP), prepared in accordance with an approved Biodiversity Gain Plan, has been submitted to and approved in writing by the local planning authority. The approved HMMP shall be strictly adhered to and implemented in full for its duration and shall contain the following:

a) Description and evaluation of the features to be managed;

b) Ecological trends and constraints on site that may influence management;

c) Aims, objectives and targets for management - links with local and national species and habitat action plans;

d) Description of the management operations necessary to achieving the aims and objectives;

e) Prescriptions for management actions;

f) Preparation of a works schedule, including annual works schedule;

g) Details of the monitoring needed to measure the effectiveness of management;

h) Details of the timetable for each element of the monitoring programme;

i) Details of the persons responsible for the implementation and monitoring;

j) Mechanisms of adaptive management to account for necessary changes within the work schedule to achieve the required targets; and

k) Reporting on year 1, 2, 5, 10, 15, 20, 25 and 30 with biodiversity reconciliation calculations at each stage.

The HMMP shall be implemented in accordance with the approved details, and all habitats shall be retained in that manner thereafter. Notice in writing shall be given to the Council when the habitat creation and enhancement works as set out in the Biodiversity Gain Plan have commenced and once all habitat creation and enhancement works have been completed.

Reason: To secure the delivery of at least a 10% biodiversity net gain through successful establishment and management of all newly created and enhanced habitats in accordance with Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021), paragraph 187, 192 and 193 of the NPPF, and Local Plan Policy EN8. It is important that these details are agreed prior to the commencement of development as any on-site works could have implications for biodiversity and Biodiversity Net Gain.

19. No development shall take place until a Woodland Protection Plan for the adjacent woodland priority habitat has been submitted to and approved in writing by the local planning authority. The woodland protection plan shall include, but not necessarily be limited to, the following:

a) A risk assessment of potentially damaging construction activities;

b) Identification of 'biodiversity protection zones';

c) Construction storage details, including waste, materials and equipment, ensuring there is a suitable buffer (ideally 10m) between storage facilities and the woodland;

d) Details of any construction lighting, ensuring light spill is not permitted towards the woodland; and

e) Preventative measures to prevent pollution from entering the woodland.

The approved plan shall be implemented in full according to the timescales laid out in the plan.

Reason: To ensure that the biodiversity of the woodland is protected in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife and Countryside Act 1981 (as amended), Policy EN8 of the Cotswold District Local Plan 2011-2031 and paragraphs 187 and 193 of the National Planning Policy Framework (Chapter 15). It is important that these details are agreed prior to the commencement of development as any on-site works could have implications for the woodland habitat and biodiversity.

20. The development shall be undertaken in accordance with the recommendations contained within sections 6.2 and 6.3 of the Ecological Impact Assessment & Biodiversity Net Gain Assessment Report, ref: W6173_rep_Wyck Hill Farm EcIA BNG_22-12-2025 (Windrush Ecology, December 2025). All of the recommendations shall be implemented in full according to the specified timescales, and thereafter permanently retained.

Reason: To ensure biodiversity is protected in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife and Countryside Act 1981 (as amended), Circular 06/2005, paragraphs 187, 192 and 193 of the National Planning Policy Framework, Policy EN8 of the Cotswold District Local Plan 2011- 2031

and in order for the Council to comply with Part 3 of the Natural Environment and Rural Communities Act 2006.

21. Prior to the installation of external lighting for the development hereby approved, a lighting design strategy for biodiversity shall be submitted to and approved in writing by the local planning authority. The strategy shall:

i. Identify areas/features on site that are particularly sensitive for nocturnal wildlife, including foraging/commuting bats;

ii. Show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their nocturnal corridors.

All external lighting shall be installed in accordance with the approved strategy and retained thereafter. No external lighting other than that approved shall be installed on the application site.

Reason: To protect nocturnal wildlife in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife and Countryside Act 1981 (as amended), Circular 06/2005, paragraphs 187, 192 and 193 of the National Planning Policy Framework (Chapter 15), local plan policy EN8 and in order for the Council to comply with Part 3 of the Natural Environment and Rural Communities Act 2006.

22. Prior to the erection of any external walls of the development hereby approved, a finalised Biodiversity Enhancement Plan for the site containing details of the provision of integrated bird and bat boxes shall be submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved specification and programme of implementation and be retained thereafter.

Reason: To protect and enhance the site for biodiversity in accordance with paragraphs 187, 192 and 193 of the National Planning Policy Framework, Policy EN8 of the Cotswold District Council Local Plan, and for the Council to comply with Section 40 of the Natural Environment and Rural Communities Act 2006. It is important that these details are agreed prior to the commencement of development

23. No development shall commence on site until a detailed Sustainable Drainage System (SuDS) Strategy document has been submitted to and approved in writing by the Local Planning Authority. The document shall be in accordance with the proposals set out in the approved submission (Proposed Surface Water Drainage Strategy Option 1 - 2550/01 / Option 2 - 2550/02). The SuDS Strategy must include a detailed design, infiltration tests carried out to the standard of BRE 365, a timetable for implementation, and a full risk assessment for flooding during the groundworks and building phases with mitigation measures specified for identified flood risks. The SuDS Strategy must

also demonstrate the technical feasibility/viability of the drainage system through the use of SuDS to manage the flood risk to the site and elsewhere and the measures taken to manage the water quality for the lifetime of the development. The approved scheme for the surface water drainage shall be implemented in accordance with the approved details before the development is first put in to use/occupied.

Reason: To ensure the development is provided with a satisfactory means of drainage and thereby preventing the risk of flooding in accordance with Local Plan Policy EN14. It is important that these details are agreed prior to the commencement of development as any works on site could have implications for drainage, flood risk and water quality in the locality.

24. No development shall be brought in to use/occupied until a SuDS 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, has been submitted to and approved in writing by the Local Planning Authority. The approved SUDS maintenance plan shall be implemented in full in accordance with the agreed terms and conditions.

Reason: To ensure the continued operation and maintenance of drainage features serving the site and avoid flooding in accordance with Local Plan Policy EN14.

Informatives:

1. IMPORTANT: BIODIVERSITY NET GAIN CONDITION - DEVELOPMENT CANNOT COMMENCE UNTIL A BIODIVERSITY GAIN PLAN HAS BEEN SUBMITTED (AS A CONDITION COMPLIANCE APPLICATION) TO AND APPROVED BY COTSWOLD DISTRICT COUNCIL.

The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for the development of land in England is deemed to have been granted subject to the condition "(the biodiversity gain condition") that development may not begin unless:

(a) a Biodiversity Gain Plan has been submitted to the planning authority, and

(b) the planning authority has approved the plan in writing.

The planning authority, for the purposes of determining whether to approve a Biodiversity Gain Plan if one is required in respect of this permission would be Cotswold District Council. There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. Based on the information available this permission is one which will require the approval of a biodiversity gain plan before development is begun because none of the statutory exemptions or transitional arrangements are considered to apply. If the onsite habitats include irreplaceable habitats (within the meaning of the Biodiversity

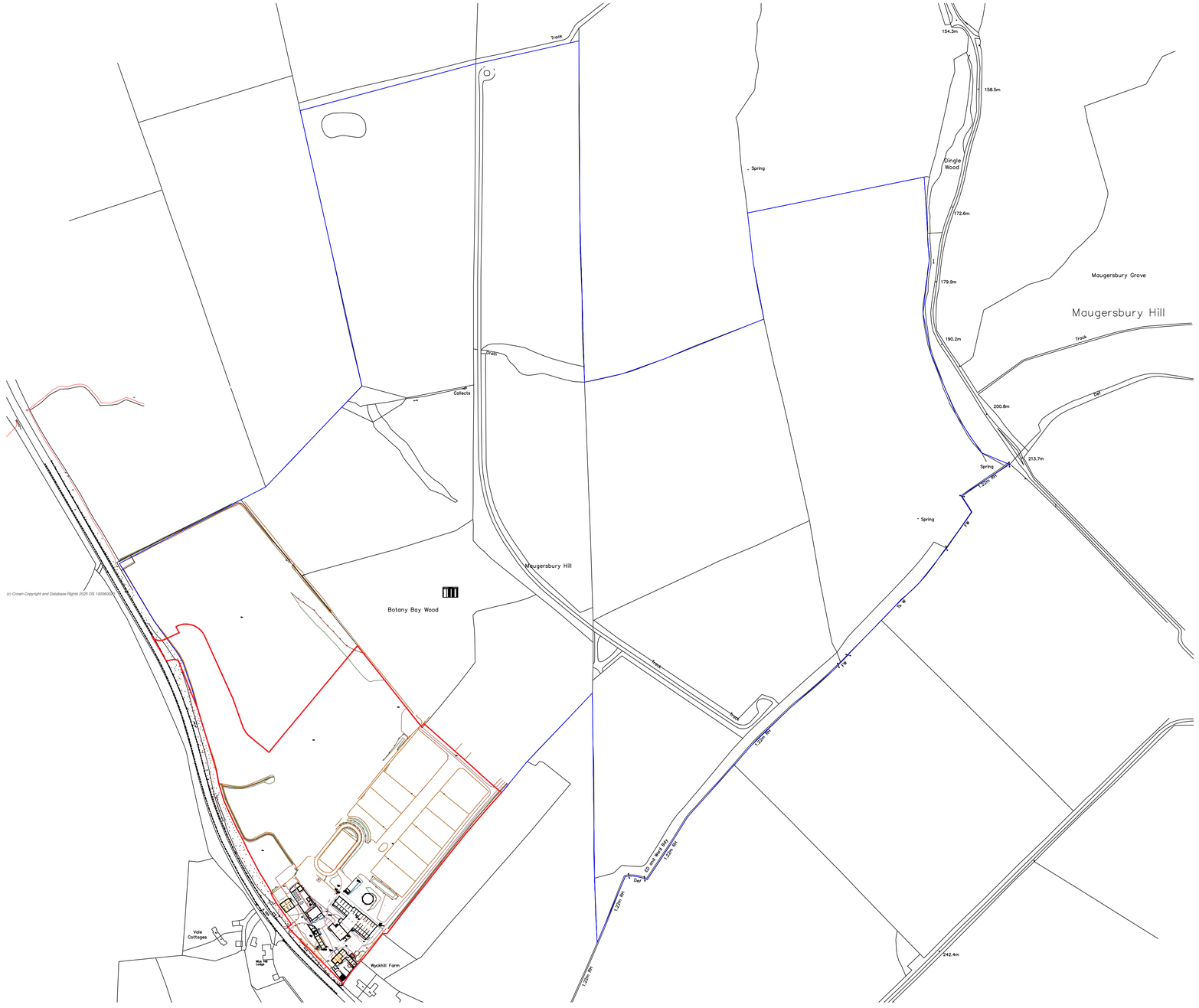
Gain Requirements (Irreplaceable Habitats) Regulations 2024) there are additional requirements for the content and approval of Biodiversity Gain Plans.

Advice about how to prepare a Biodiversity Gain Plan and a template can be found at https://www.gov.uk/guidance/submit-a-biodiversity-gain-plan Information on how to discharge the biodiversity gain condition can be found here:

https://www.cotswold.gov.uk/planning-and-building/wildlife-and-biodiversity/biodiversity-net-gain-bng/

2. The Local Highway Authority has no objection to the above, subject to the applicant obtaining a section 184 licence. The construction of a new access will require the extension of a verge and/or footway crossing from the carriageway under the Highways Act 1980 - Section 184 and the Applicant is required to obtain the permission of Gloucestershire Highways on 08000 514 514 or highways@gloucestershire.gov.uk before commencing any works on the highway.

Full Details can be found at www.gloucestershire.gov.uk



1 LOCATION PLAN
1:2500

NORTH

0 20.0 60.0 100.0 200.0 250.0m

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Rev.	Description	Date	Drw.	Chk.
01	Drawing updated to include entire blue line boundary	20.08.25	JW	LB

Client
DAVID BRIDGEWATER RACING

Project
NEW EQESTRIAN FACILITY
WYCK HILL FARM

Drawing Title
LOCATION PLAN

Drawing Status
PLANNING

Corstorphine & Wright
Tamworth Studio
5 Aldergate, Tamworth, B79 7DJ
01827 671 23
corstorphine-wright.com

Drawing No.	Revision
24165-0201	01

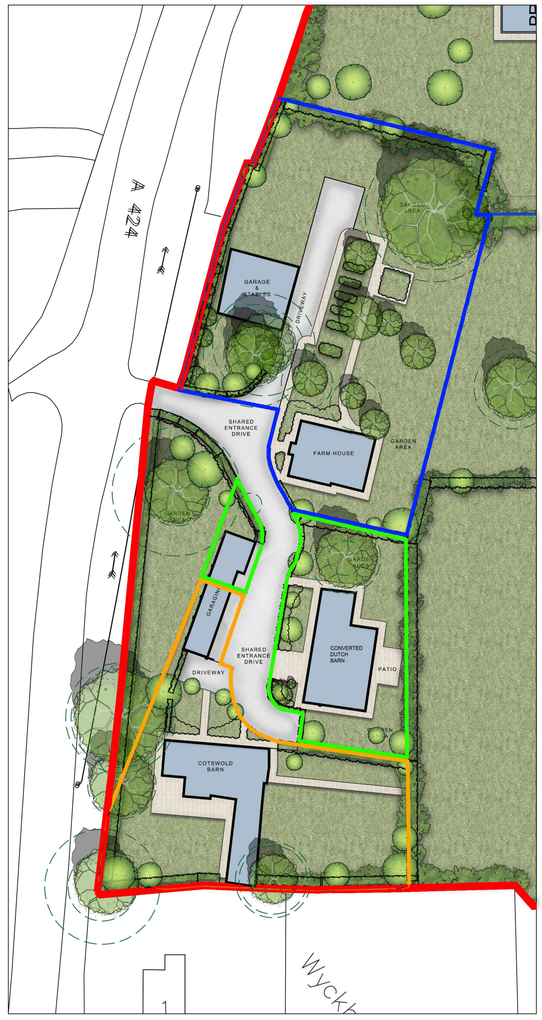
Drawn	Checked	Paper Size	Scale	Date
JW	LB	A1	1:2500	14.07.25

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refer to landscape architects drawings for detailed landscaping proposals

1 PROPOSED SITE PLAN
1:1000



2 PROPOSED SITE PLAN (EXTRACT)
1:500

refer to landscape architects drawings for detailed landscaping proposals

NORTH

0 10.0 20.0 30.0 40.0 50.0 100.0m

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Rev.	Description	Date	Drw.	Chk.
03	Indicative levels added	18/11/25	LB	CH
02	Landscaping note added	10/09/25	JW	LB
01	tree root protection areas and indicative retaining wall added to site plan	13.08.25	JW	LB

Client
DAVID BRIDGEWATER RACING

Project
NEW EQESTRIAN FACILITY
WYCK HILL FARM

Drawing Title
SITE PLAN PROPOSED
OVERALL SITE PLAN

Drawing Status
PLANNING

Corstorphine & Wright
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5 Aldergate, Tamworth, B79 7DJ
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Drawing No.	Revision
24165-0203	03

Drawn	Checked	Paper Size	Scale	Date
JW	LB	A1	1:1000	14.07.25

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Indicative Planting Palette

TREES

Trees to be planted in location as shown. Trees to be well branched extra heavy standard or heavy standard root ball or bare root stock at a height of 350-600cm.

Example Species:


Quercus robur


Carpinus betulus


Acer campestre


Betula pendula


Sorbus aucuparia


Sorbus torminalis

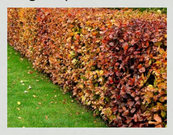
NATIVE HEDGING

Species-Rich Native Hedgerow
Hedge species to be clipped to 2m tall to ensure continuous height hedge. Bare root stock planted in a double staggered row at 5no. plants per linear metre.



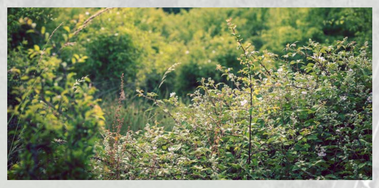
Example Species:
Acer campestre
Corylus avellana
Crataegus monogyna
Prunus spinosa
Rosa canina
Viburnum opulus

Single-Species Native Hedgerow


Fagus sylvatica

MIXED NATIVE SCRUB

Scrub species to be bare root whips planted in groups of 8-15 no. plants of a single species with any evergreen species distributed evenly throughout the planted area.



Example Species:
Cornus sanguinea
Corylus avellana
Crataegus monogyna
Euonymus europaeus
Frangula alnus
Ilex aquifolium
Viburnum lantana

NATIVE SHRUBS TO PROPOSED SLOPE

Example Species:
Cornus sanguinea
Corylus avellana
Euonymus europaeus
Ligustrum vulgare
Viburnum opulus

ORNAMENTAL

Shrub, ornamental grass and herbaceous planting in and around the residential plots and equestrian development to incorporate a mixture of native and ornamental species. Shrubs to be 3/5L pots planted at an average of 3 plants per sqm.

Traditional fruit tree planting of local varieties will also be incorporated.


Malus domestica Ashmead's Kernel

Residential Palette
Example Species:


Viburnum opulus 'Roseum'


Rosa 'Flower Carpet White'

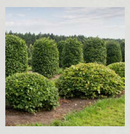

Lavandula angustifolia 'Hidcote'


Hebe 'Nicola's Blush'

Equestrian Palette
Example Species:


Calamagrostis x acutiflora 'Karl Foerster'


Verbena bonariensis


Carpinus betulus



LEGEND

- Boundary
- Existing vegetation retained
- Proposed species-rich native hedgerow
- Proposed single species native hedgerow
- Proposed small trees native/non-native
- Proposed medium trees native/non-native
- Proposed large trees native/non-native
- Proposed ornamental shrub
- Proposed mixed native scrub
- Proposed mixed native shrubs suitable for slope planting
- Proposed modified grassland
- Existing grassland to be retained and enhanced and reseeded where required
- Proposed other neutral grassland (Emorsgate EH1 Hedgerow Mixture)

N.B. Existing grassland disturbed to facilitate construction is to be reinstated and seeded with Emorsgate EM3.

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BLADE Landscape Architects Ltd is registered in England and Wales.
Registered address 30 St Georges Square, Worcester WR1 1HX
Registered number 11068394.

N

0 10 20 35 m

REV	Description	Date
V2	Amended to updated layout	26/08/2025
V1	First Issue	08/11/2024

BLADE

30 St Georges Square, Worcester, WR1 1HX
01905 947558
www.weareblade.co.uk

CLIENT
David Bridgwater Racing

PROJECT
Wyck Hill Farm, Stow-on-the-Wold, Gloucestershire

DRAWING TITLE
Landscape Masterplan

DRAWING STATUS
Planning

DRAWING NO.	REVISION
1640-L-D-PL-200	V2

DRAWN	CHECKED	SCALE	PAPER SIZE	DATE
KC	ST	1:500	A0	NOV-2024

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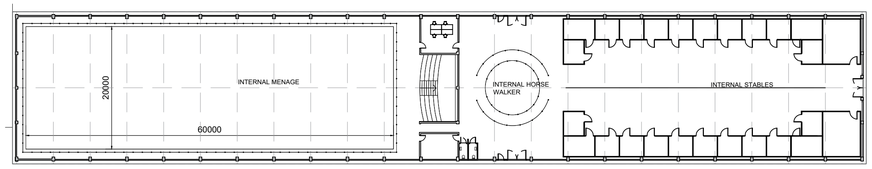
E3.1 PROPOSED NORTH WEST ELEVATION (EXTRACT)
1:100



E3.2 PROPOSED NORTH WEST ELEVATION (EXTRACT)
1:100

E.3 PROPOSED NORTH WEST ELEVATION

E.2 PROPOSED SOUTH WEST ELEVATION



E.4 PROPOSED NORTH EAST ELEVATION

E.1 PROPOSED SOUTH EAST ELEVATION

P.1 PROPOSED FLOOR PLAN
1:500

NORTH



E.3 PROPOSED NORTH WEST ELEVATION
1:500



E.4 PROPOSED NORTH EAST ELEVATION
1:200

MATERIAL SCHEDULE
1. Vertical Timber cladding in black
2. Concrete panels
3. Curtains
4. Steel Columns Encased in Dark Grey Cladding
5. Timber Truss, Black
6. Metal Standing Seem Roof - Dark Grey
7. Black uPVC RW goods

0 1.0 2.0 3.0 4.0 5.0 10.0m

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Rev.	Description	Date	Drw.	Chk.
02	Titleblock and drawing labels updated	14.10.25	LB	CH
01	Material Schedule Updated	01.09.25	JW	LB

Client
DAVID BRIDGEWATER RACINGF

Project
NEW EQUESTRIAN FACILITY
WYCK HILL FARM

Drawing Title
EQUESTRIAN SCHOOL (SHEET 2)
PROPOSED ELEVATIONS 2 OF 2

Drawing Status
PLANNING

Corstorphine & Wright
Tamworth Studio
5 Aldergate, Tamworth, B79 7DJ
01827 671 23
corstorphine-wright.com

Drawing No.	Revision
24165-0413	02

Drawn	Checked	Paper Size	Scale	Date
JW	CH	A1	1:100	22.07.25

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E.1 PROPOSED NORTH WEST ELEVATION
1:100



E.2 PROPOSED NORTH EAST ELEVATION
1:100



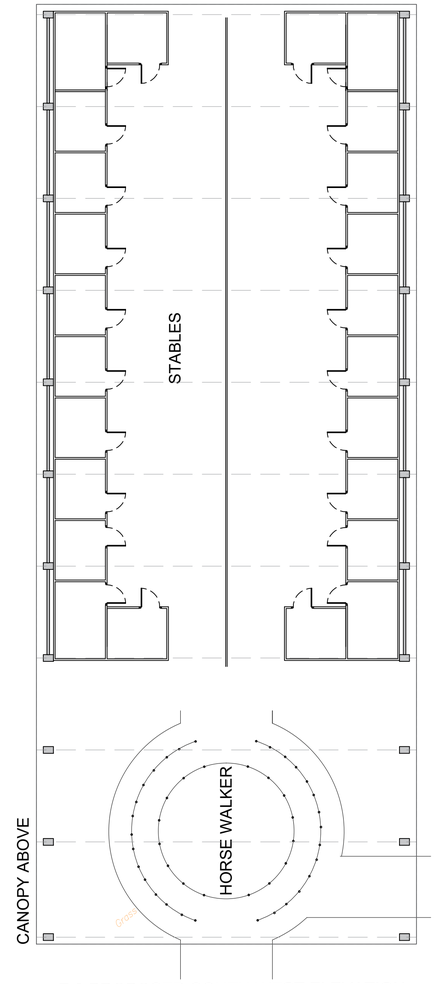
E.3 PROPOSED SOUTH WEST ELEVATION
1:100



E.4 PROPOSED SOUTH EAST ELEVATION
1:100

E.2 PROPOSED NORTH EAST ELEVATION

E.1 PROPOSED NORTH WEST ELEVATION



E.4 PROPOSED SOUTH EAST ELEVATION

E.3 PROPOSED SOUTH WEST ELEVATION

P.1 PROPOSED FLOOR PLAN
1:200

NORTH

MATERIAL SCHEDULE

1. Vertical Timber cladding in black
2. Concrete panels
3. Steel Columns Encased in Dark Grey Cladding
4. Metal Standing Seem Roof - Dark Grey
5. Black uPVC RW goods

0 1.0 2.0 3.0 4.0 5.0 10.0m

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Rev.	Description	Date	Drw.	Chk.
01	Material Schedule added	01.09.25	JW	LB

Client
DAVID BRIDGEWATER RACINGF

Project
NEW EQUESTRIAN FACILITY
WYCK HILL FARM

Drawing Title
PROPOSED AMERICAN BARN
PROPOSED ELEVATIONS

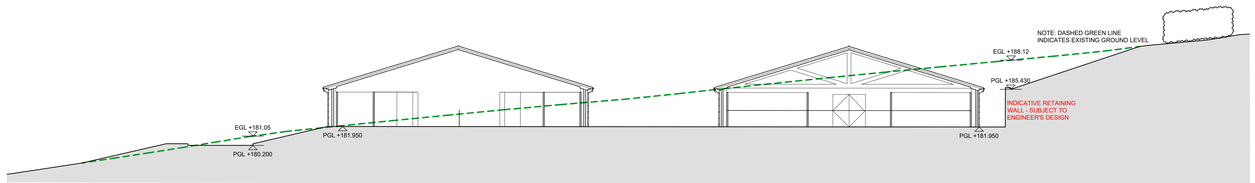
Drawing Status
PLANNING

Corstorphine & Wright
Tamworth Studio
5 Aldergate, Tamworth, B79 7DJ
01827 671 23
corstorphine-wright.com

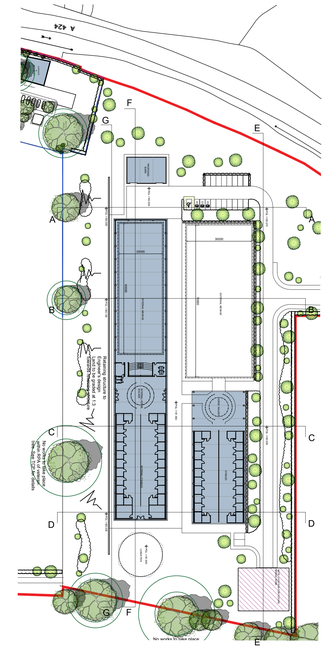
Drawing No.	Revision
24165-0432	01

Drawn	Checked	Paper Size	Scale	Date
JW	CH	A1	1:100	22.07.25

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1 Site Section DD
1:200

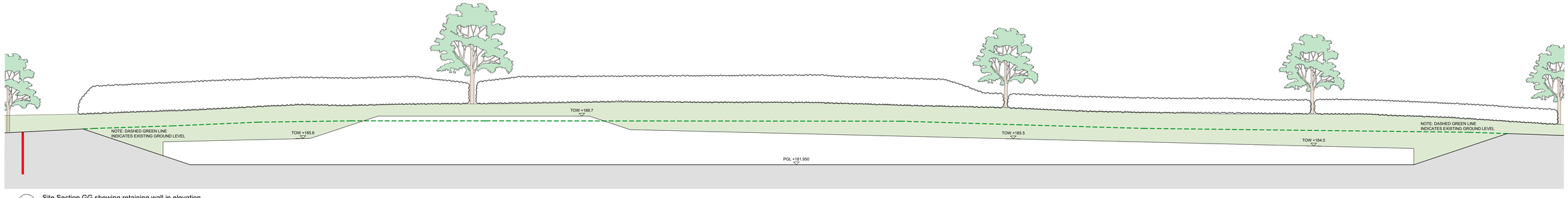


5 Site Plan
1:1000



2 Site Section EE
1:200

3 Site Section FF
1:200



4 Site Section GG showing retaining wall in elevation
1:200

0 2.0 4.0 6.0 8.0 10.0 20.0m

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Rev	Description	Date	Drw.	Chk.
00	Initial Issue	18.11.25	LB	CH

KEY:
EGL - EXISTING GROUND LEVEL
PGL - PROPOSED GROUND LEVEL
TOW - TOP OF WALL

Client
DAVID BRIDGWATER RACING

Project
EQUESTRIAN CENTRE
WYCK HILL FARM

Drawing Title
PROPOSED SITE SECTIONS

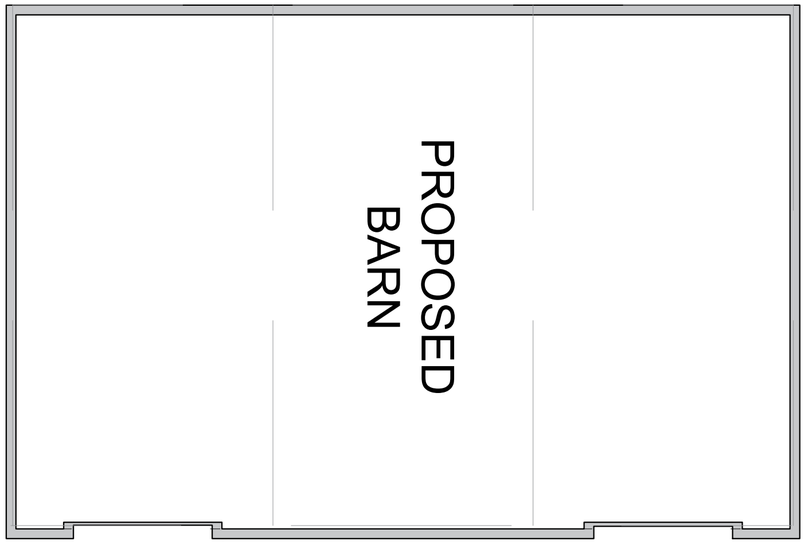
Drawing Status
PLANNING

Corstorphine & Wright
Tamworth Studio
5 Aldergate, Tamworth, B79 7DJ
01827 871 23
corstorphine-wright.com

Drawing No.	Revision
24165-0205	00

Drawn	Checked	Paper Size	Scale	Date
LB	CH	A0	1:200	24.07.25

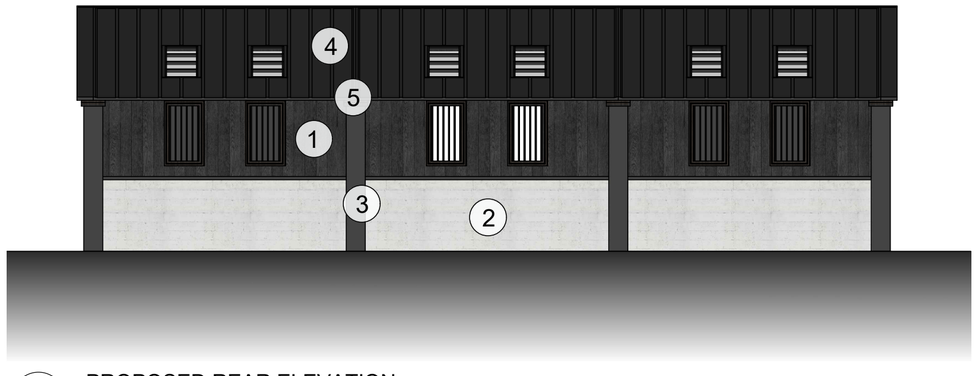
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1 PROPOSED GROUND FLOOR PLAN
1:100

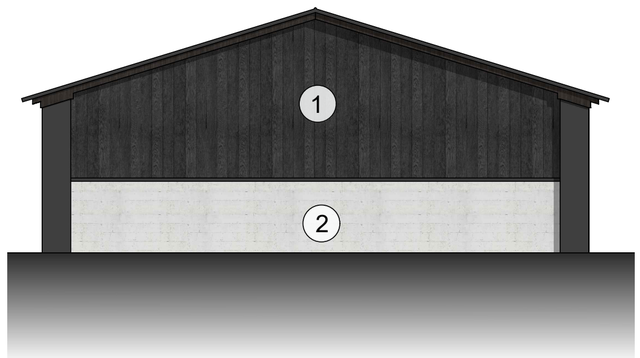


E.1 PROPOSED FRONT ELEVATION
1:100

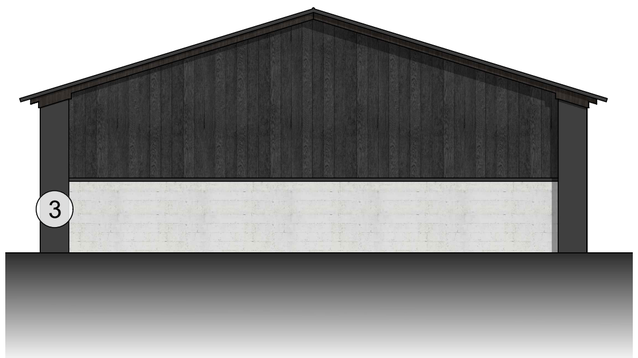


E.2 PROPOSED REAR ELEVATION
1:100

MATERIAL SCHEDULE
1. Vertical Timber cladding in black
2. Concrete panels
3. Steel Columns Encased in Dark Grey Cladding
4. Metal Standing Seem Roof - Dark Grey
5. Black uPVC RW goods



E.3 PROPOSED SIDE ELEVATION
1:100



E.4 PROPOSED SIDE ELEVATION
1:100

0 1.0 2.0 3.0 4.0 5.0 10.0m

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Rev.	Description	Date	Drw.	Chk.
00	Initial Issue	10.09.25	JW	LB

Client
DAVID BRIDGEWATER RACING

Project
NEW EQUESTRIAN FACILITY
WYCK HILL FARM

Drawing Title
PROPOSED BARN
FLOOR PLANS AND ELEVATIONS

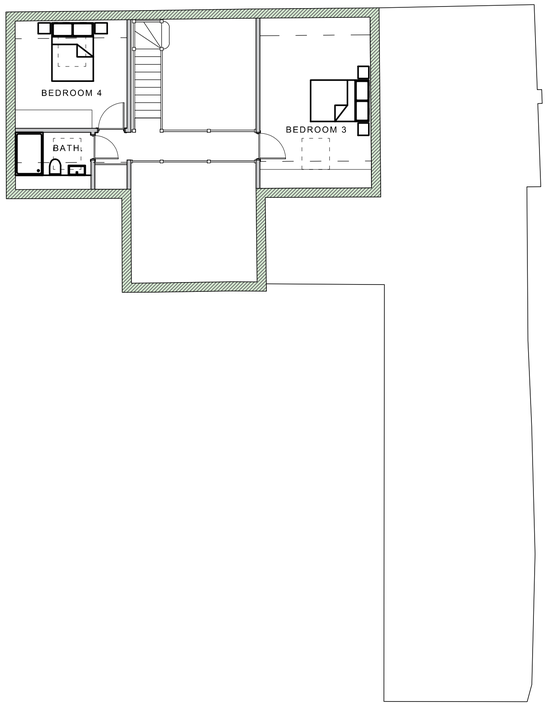
Drawing Status
PLANNING

Corstorphine & Wright
Tamworth Studio
5 Aldergate, Tamworth, B79 7DJ
01827 671 23
corstorphine-wright.com

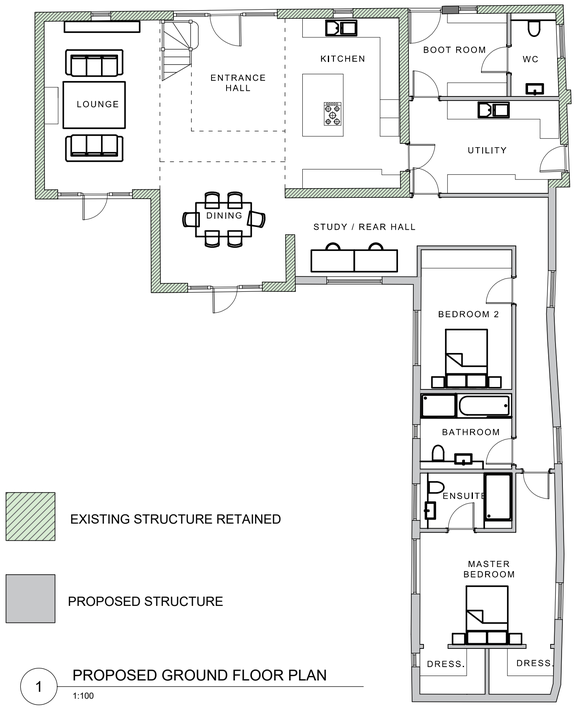
Drawing No.	Revision
24165 - 0403	00

Drawn	Checked	Paper Size	Scale	Date
CH	LB	A2	1:100	15.07.2025

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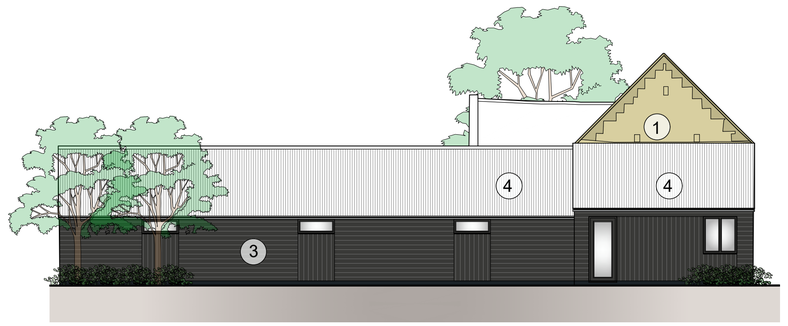
2 PROPOSED FIRST FLOOR PLAN
1:100



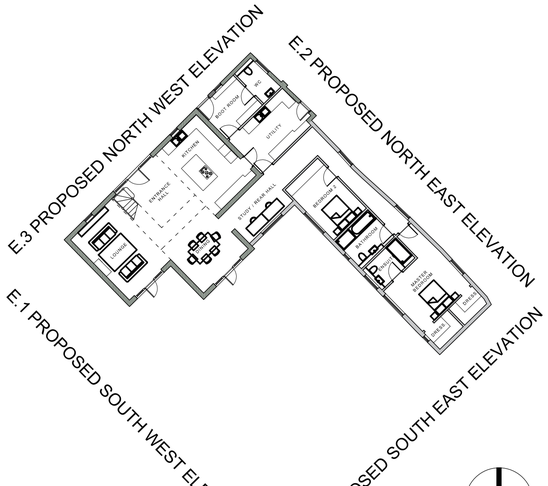
1 PROPOSED GROUND FLOOR PLAN
1:100



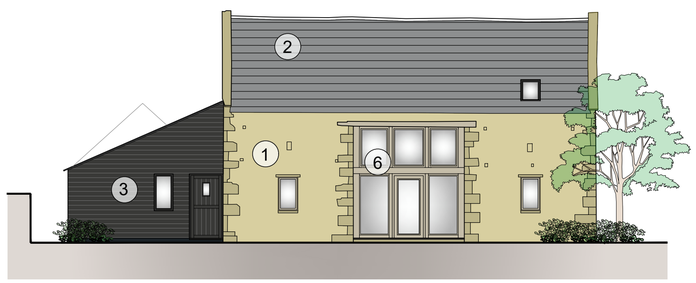
E.1 PROPOSED SOUTH WEST ELEVATION
1:100



E.2 PROPOSED NORTH EAST ELEVATION
1:100



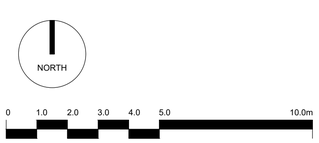
MATERIAL SCHEDULE
1. Existing Stone brickwork retained
2. Roof tiles retained
3. Proposed timber cladding, to match existing
4. Proposed Standing seam metal clad roof
5. Proposed Solar Panels
6. Proposed Glazing and frames



E.3 PROPOSED NORTH WEST ELEVATION
1:100



E.4 PROPOSED SOUTH EAST ELEVATION
1:100



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Rev.	Description	Date	Drw.	Chk.
02	Retained and proposed structures highlighted on plan	10.09.25	JW	LB
01	Material Schedule added to Drawing	01.09.25	JW	LB

Client
DAVID BRIDGEWATER RACING

Project
NEW EQUESTRIAN FACILITY
WYCK HILL FARM

Drawing Title
PROPOSED COTSWOLD BARN
FLOOR PLANS AND ELEVATIONS

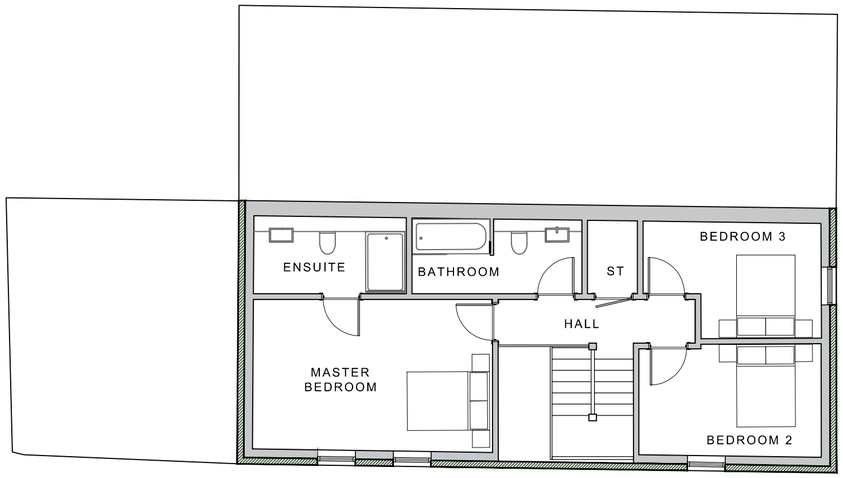
Drawing Status
PLANNING

Corstorphine & Wright
Birmingham Studio
Alpha Building, Suffolk Street Queensway, Birmingham, B1 1TT
0121 737 8350
corstorphine-wright.com

Drawing No.	Revision
24165-0402	02

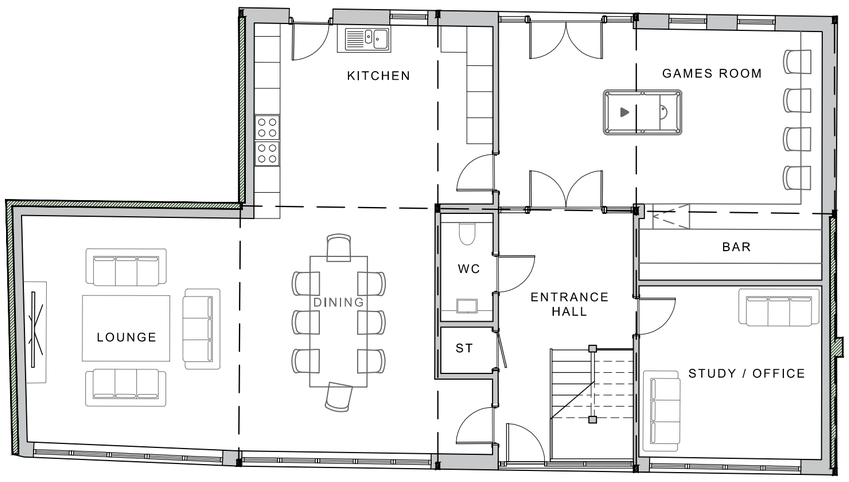
Drawn	Checked	Paper Size	Scale	Date
JW	LB	A1	1:100	16.07.25

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2 PROPOSED FIRST FLOOR PLAN

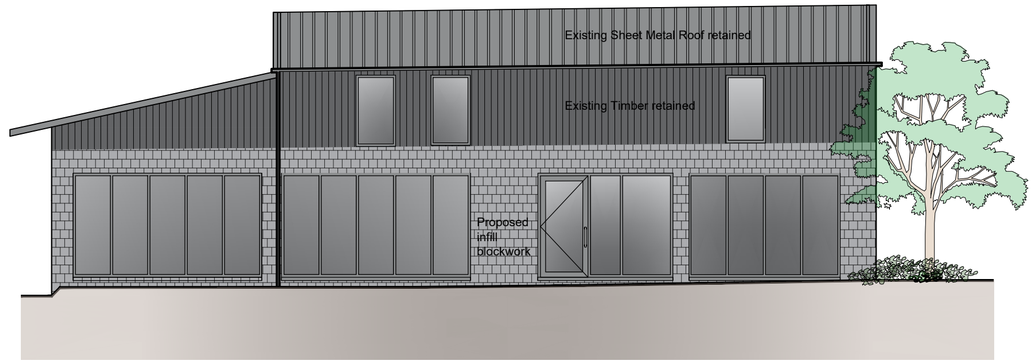
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1 PROPOSED GROUND FLOOR PLAN

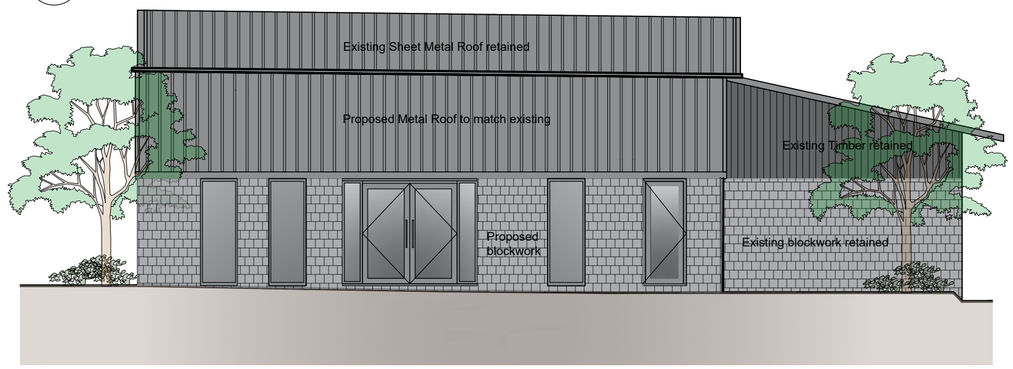
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EXISTING STRUCTURE RETAINED



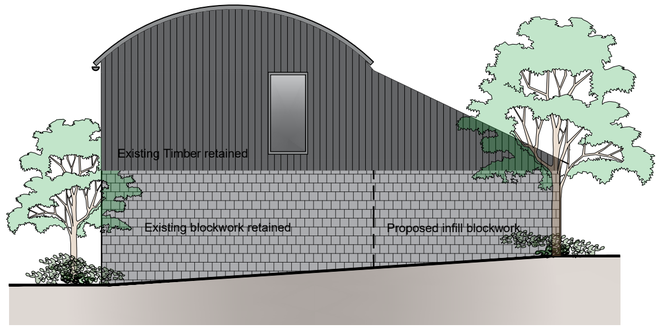
E.1 PROPOSED FRONT ELEVATION

1:100



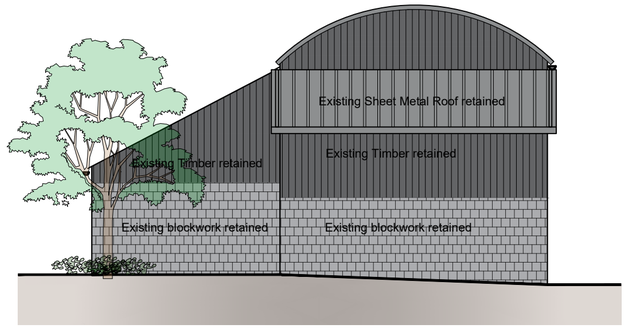
E.2 PROPOSED REAR ELEVATION

1:100



E.3 PROPOSED SIDE ELEVATION

1:100



E.4 PROPOSED SIDE ELEVATION

1:100

0 1.0 2.0 3.0 4.0 5.0 10.0m

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Rev.	Description	Date	Drw.	Chk.
02	Floor Plans and elevations updated in line with design changes			
01	Glazzing reduced, more existing timber cladding retained.	13.08.25	JW	LB

Client
DAVID BRIDGEWATER RACING

Project
NEW EQUESTRIAN FACILITY
WYCK HILL FARM

Drawing Title
PROPOSED DUTCH BARN
FLOOR PLANS AND ELEVATIONS

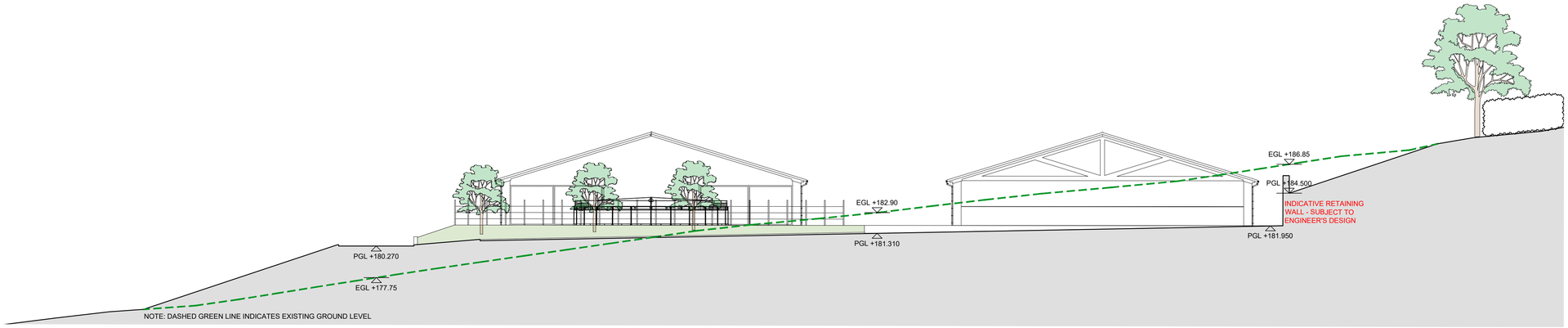
Drawing Status
PLANNING

Corstorphine & Wright
Tamworth Studio
5 Aldergate, Tamworth, B79 7DJ
01827 671 23
corstorphine-wright.com

Drawing No.	Revision
24165 - 0401	02

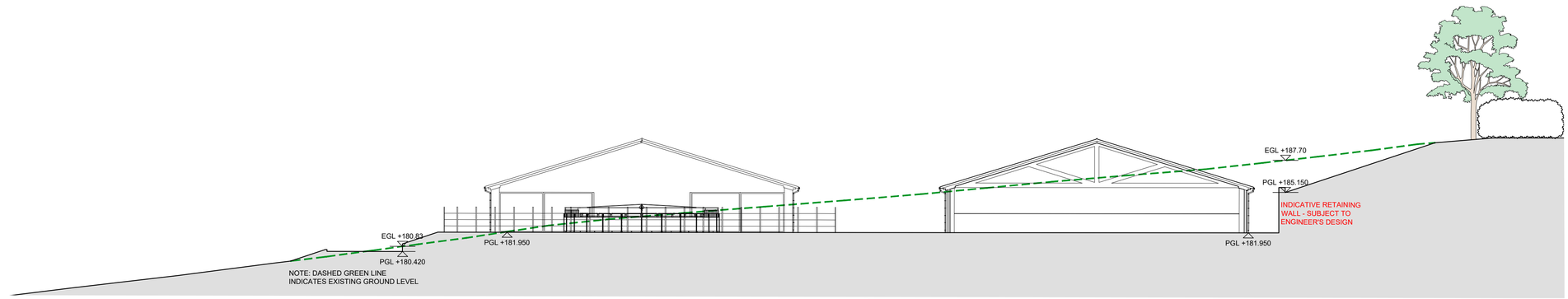
Drawn	Checked	Paper Size	Scale	Date
CH	LB	A2	1:100	15.07.2025

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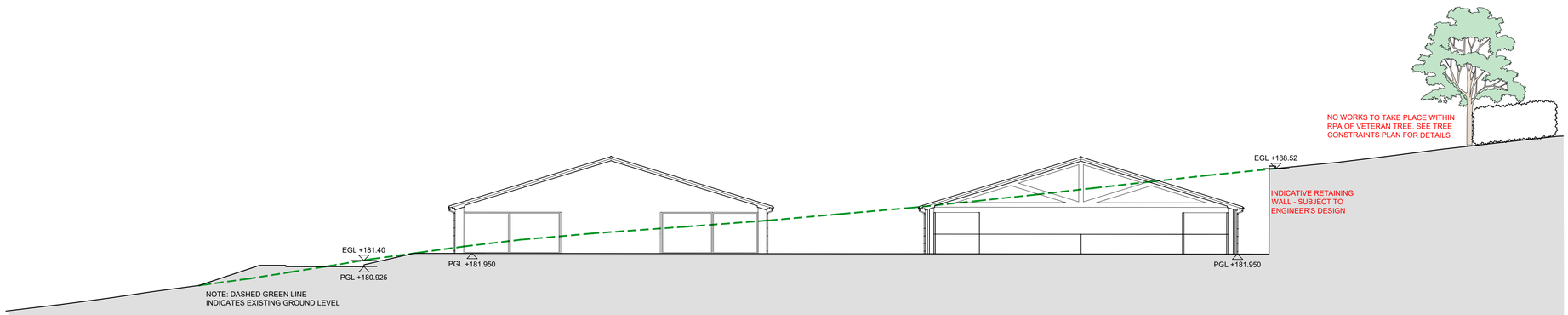
1 Site Section AA

1:200



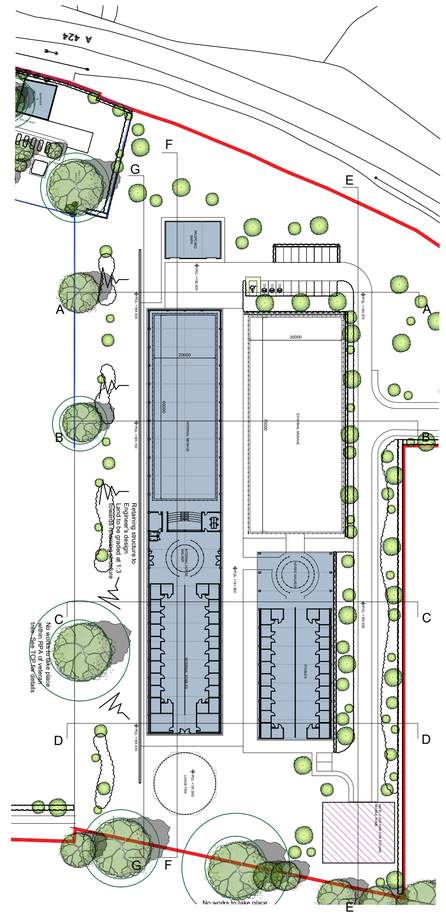
2 Site Section BB

1:200



3 Site Section CC

1:200



4 Site Plan

1:1000

0 2.0 4.0 6.0 8.0 10.0 20.0m

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Rev.	Description	Date	Drw.	Chk.
02	She split to accommodate more sections	18.11.25	LB	CH
01	Indicative retaining wall added to proposed site sections	13.08.25	JW	LB
00	Initial Issue	24.07.25	LB	CH

KEY:
EGL - EXISTING GROUND LEVEL
PGL - PROPOSED GROUND LEVEL
TOW - TOP OF WALL

Client
DAVID BRIDGWATER RACING

Project
EQUESTRIAN CENTRE
WYCK HILL FARM

Drawing Title
PROPOSED SITE SECTIONS
SHEET 1 OF 2

Drawing Status
PLANNING

Corstorphine & Wright
Tamworth Studio
5 Aldergate, Tamworth, B79 7DJ
01827 671 23
corstorphine-wright.com

Drawing No.	Revision
24165-0205	02

Drawn	Checked	Paper Size	Scale	Date
LB	CH	A1	1:200	10.02.25

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MAINPOINT
FIRE & SECURITY





Development of land and erection of buildings to expand an existing Integrated Retirement Community (Use Class C2), including landscaping, parking, access and associated works at Siddington Park Cirencester Road Gloucestershire GL7 6GU

Full Application 24/02513/FUL	
Applicant:	Rangeford Holdings Ltd
Agent:	Pegasus
Case Officer:	Andrew Moody
Ward Member(s):	Councillor Mike Evemy
Committee Date:	11 February 2026
RECOMMENDATION:	**PERMIT SUBJECT TO THE COMPLETION OF A SECTION 106 LEGAL AGREEMENT FOR THE PAYMENT OF FINANCIAL CONTRIBUTIONS TOWARDS LIBRARY FACILITIES AND TRAVEL PLAN; ALSO THE PAYMENT OF THE FINANCIAL CONTRIBUTION TO MITIGATE THE IMPACT OF THE DEVELOPMENT UPON THE NORTH MEADOW AND CLATTINGER FARM SPECIAL AREA OF CONSERVATION**

1. Main Issues:

(a) Background and Proposed Development
(b) Principle of Development
(c) Affordable Housing
(d) Design and Impact upon Heritage Assets
(e) Landscape and Trees
(f) Residential Amenity
(g) Biodiversity
(h) Highways
(i) Library Contribution
(j) CIL

2. Reasons for Referral:

2.1 The application has been referred to the Review Panel by the Ward Member, Cllr Mike Evemy, for the following reasons:

2.2 *'I would like this application to be considered by the Approval Panel and subsequently considered by the Planning and Licensing Committee for the following reasons:*

2.2.1 The size of this development (55 dwellings) makes it a major application which would automatically be considered by the Committee under our current scheme of delegation. This application was validated just a week or so before that scheme came into force.

2.2.2 There has been significant interest in the application locally with many objections made by residents about the scale of the development and its potential impact on the residential amenity of neighbours

2.2.3 If granted, the dwellings would contribute towards the District's increased housing target although there are no affordable dwellings incorporated into the scheme.'

3. Site Description:

3.1 The proposal relates to land that forms part of the site associated with the now constructed Care Home development, known as Siddington Park, adjacent to, and accessed from, the A419. The site is to the southern side of the access to the east of the village of Siddington, and to the west of the village of Preston.

3.2 The site is bounded by residential development to the north (Preston Leigh) and south and the existing care home buildings to the east. It is not within a Conservation Area and the nearest Listed Buildings are Preston Mill, just to the north-west across the South Cerney Road, and Siddington House to the south of the existing care home development, both of which are Grade II listed. The site is covered by a group Tree Protection Order (TPO).

3.3 The site is located within Flood Zone 1 as identified by the Environment Agency.

4. Relevant Planning History:

4.1 06/02770/OUT: Outline application for business park (Use Class B1): Granted 14.12.2007

4.2 08/01259/REM: Reserved Matters application for the detailed roundabout access to the previously approved employment development: Granted 15.10.2008

4.3 11/05462/FUL: Construction of site access, including connection to new roundabout on A419: Granted 25.01.2012

4.4 11/05716/OUT: Outline application for a Continuing Care Retirement Community (Use Class C2), including a core building with care bedrooms, close care units, linked assisted units and ancillary facilities, detached assisted living units, landscaped grounds, internal highway layout and car parking (access layout of all buildings, full details of the core building and 20 associated assisted living units to be determined in detail): Granted 13.11.2012

4.5 14/05481/REM: Reserved Matters pursuant to Outline permission ref. 11/05716/OUT (Continuing Care Retirement Community (Use Class C2), including a core building with care bedrooms, close care units, linked assisted units and ancillary facilities, detached assisted living units, landscaped grounds, internal highway layout and car parking). Granted 09.10.2015

4.6 15/02532/OUT: Outline application for an extension to the continuing care retirement community development permitted under application ref: 11/05716/OUT (Use Class C2) comprising the construction of a 46-bed Dementia Care Unit and additional 4 blocks of Assisted Living Units (32-beds), landscaped grounds, internal highways, car parking and associated works: Granted 11.03.2016

4.7 16/01264/FUL: Application for an additional assisted living apartment block (6 units) within the previously permitted Continuing Care Retirement Community development (Use Class C2): Granted 12.07.2016

4.8 17/00076/OUT: Part Outline/part detailed full application for planning permission for a revised scheme for the Continuing Care Retirement Community permitted under Application Ref 11/05716/OUT (Use Class C2) and under application Ref 15/02532/OUT (Use Class C2), comprising the extension of earlier site, construction of a central facilities building providing community care services together with provision of 171 Assisted Living Units/Close Care Units together with landscaped grounds, internal highways, parking and associated works Permitted 21.02.2018

4.9 20/00543/FUL Erection of single storey ancillary building associated with the care home for a temporary 3 year period and erection of 4 flagpoles with associated car parking and landscape works including gates and wall. Granted 21.02.2018

4.10 25/02115/TPO: T2 - Lime: Pollard at 3m to prevent future breakout/failure. T12 - Monterey Cypress: Fell as part of good management, unsuitable for long term retention. T18 - Monterey Cypress: Fell to prevent future failure. T22 - Monterey Cypress: Fell as part of good management, unsuitable for long term retention. T24 - Monterey Cypress: Fell as part of good management, unsuitable for long term retention. T26 - Monterey Cypress: Fell as part of good management, unsuitable for long term retention. T28 - Maple: Fell to prevent future failure over adjacent property. T30 - Monterey Cypress: Fell as part of good management, unsuitable for long term retention. T33 - Monterey Cypress: Fell as part of good management, unsuitable for long term retention. T35 - Monterey Cypress: Fell as part of good management, unsuitable for long term retention. T46 - Monterey Cypress: Fell as part of good management, unsuitable for long term retention. T48 - Monterey Cypress: Fell as part of good management, unsuitable for long term retention. T51 - Monterey Cypress: Fell as part of good management, unsuitable for long term retention. Reduce length of all branching from all trees overhanging boundary to the north back to fence line. Granted 02.09.2025

5. Planning Policies:

- TNPPF The National Planning Policy Framework
- DS4 Open Market Housing o/s Principal/non-Pr
- EN1 Built, Natural & Historic Environment
- EN2 Design of Built & Natural Environment
- EN4 The Wider Natural & Historic Landscape
- EN7 Trees, Hedgerows & Woodlands
- EN8 Bio & Geo: Features Habitats & Species
- EN9 Bio & Geo: Designated Sites
- EN10 HE: Designated Heritage Assets
- EN14 Managing Flood Risk
- EN15 Pollution & Contaminated Land
- INF3 Sustainable Transport
- INF4 Highway Safety
- INF5 Parking Provision
- INF7 Green Infrastructure

6. Observations of Consultees:

6.1 Conservation Officer: Concerns over the design, comments incorporated into the report

6.2 Biodiversity Officer: No objection subject to conditions

6.3 Strategic Housing: Accepts content of Viability Assessment

6.4 Environmental and Regulatory Services (Noise): No objection subject to conditions

6.5 Environmental and Regulatory Services (Contamination): No objection

6.6 Newt Officer: No objection, recommends informative note

6.7 Tree Officer: No objection subject to conditions

6.8 Lead Local Flood Authority: No objection

6.9 Environment Agency: No comment

6.10 Thames Water: No objection

6.11 GCC Community Infrastructure: Contribution towards Library provision required

6.12 Natural England: No objection subject to securing appropriate mitigation

7. View of Town/Parish Council:

7.1 Preston Parish Council - Comments received 16 October 2024

7.2 Whilst the Parish Council has no objections to this application, it is particularly concerned about the effect that it will have on existing residents on the site as well as those in the neighbouring properties in Preston Leigh. In particular:

- Building is much denser than the completed part of the site.
- Windows and balconies will overlook properties in Preston Leigh as acknowledged in the Statement of Community Involvement.
- Insufficient car parking and spaces provided should be wider to accommodate disabled and elderly residents.
- There is no continuous flow of traffic through the site. Any vehicles entering the site, on the existing narrow roads, will need to turn causing congestion and possible issues for emergency vehicles.
- Existing trees should be retained and all measures recommended by Ayers Forestry in the Arboricultural report should be adhered to.

- There is concern regarding the safety of some of the existing trees which may be dead or diseased, particularly as a bough fell into the garden of a Preston Leigh resident recently.
- The Parish Council would like to see plans for planting to mitigate the impact of the development.
- There is concern whether the attenuation tank, previously installed, is adequate to cope with the proposals in phase 2?

7.3 During the construction phase, the Parish Council would like to see the following arrangements put in place for the benefit of existing residents and those at Preston Leigh:

- Restriction of working hours to include early mornings and weekends
- Concern re 24/7 security lighting and cameras which were a nuisance during phase 1 of the build.
- Concern regarding congestion on the narrow roads within the site for construction and emergency vehicles.
- Satellite Navigation systems direct traffic to Preston Leigh and, therefore, clear signage to the site is required

7.4 In addition, concerns have been raised regarding the overgrown planting around the attenuation tank which is causing visibility problems for drivers on the South Cerney Road as well as whether the currently closed site exit / entrance on the South Cerney Road will be reinstated. Please could you confirm the situation ?

7.5 Preston Parish Council - Comments received 12th January 2026

7.6 Preston Parish Council formally objects to the above planning application for the following reasons.

7.7 The proposed development is contrary to the Cotswold Design Code. The introduction of large, four-storey buildings is overbearing and inappropriate for the site and its setting. In particular, the scale, massing and height of the buildings fail to respect the surrounding landscape character. As noted by the Council's Conservation Officer, the density and scale of development-especially the four-storey form of Block 4-does not fully accord with adopted design policy. The proposals conflict with principles requiring new buildings to be proportioned to a human scale, avoid excessive or uncharacteristic bulk, and sit comfortably within their landscape or townscape context. Furthermore, the height of the buildings does not provide a gentle transition from open

countryside to settlement edge, contrary to policies D.16, D.17 and D.18 of the Cotswold Design Code.

7.8 In addition, the application raises significant heritage concerns. The site lies close to Siddington House and Preston Mill, both Grade II listed buildings, and opposite Preston Conservation Area across the Swindon to Cirencester Road. The Local Planning Authority has a statutory duty under Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings and their settings. The National Planning Policy Framework (Section 16) requires great weight to be given to the conservation of designated heritage assets, including Conservation Areas. The proposal fails to adequately preserve or respect the setting of these heritage assets and conflicts with Local Plan Policies EN10 and EN11.

7.9 The Parish Council is also concerned that the height and scale of the proposed buildings will result in unacceptable overlooking of existing neighbouring properties, leading to a loss of privacy and a loss of light. The overall density and massing are excessive and not in keeping with the character of the surrounding area. The development appears more akin to an urban form of development rather than one appropriate to the edge of a rural settlement.

7.10 The Parish Council also brings to the Officer's attention that no reference is made, in either the application or the Officer's report, to the Preston Neighbourhood Development Plan (NDP) which specifically refers to the retention of the village character of Preston. The proposed extension to the Rangeford development is clearly contrary to the vision set out in the NDP. As the Preston NDP has been adopted, its requirements should be taken into account.

7.11 The development would inevitably give rise to an increase in traffic at the junction with A419 and an increase in pedestrian journeys. Therefore, particular attention should be paid to creating a safe walking route from the development to Town and connectivity with bus routes.

7.12 Further concern is raised regarding the location of the communal bin store adjacent to neighbouring properties, which may result in vermin infestations and unhygienic conditions, causing unacceptable harm to residential amenity.

7.13 Given that the proposal conflicts with adopted Cotswold District Council policies, Preston Parish Council urges the Planning Committee to refuse planning permission. A development of a lower height and reduced density

would be significantly more appropriate for this sensitive site and its surroundings.

8. Other Representations:

8.1 48 representations have been received objecting to the proposal, raising the following matters:

- density too high
- traffic and congestion
- development too high
- will overrun facilities in Phase 1
- would prefer two storey maximum
- overlooking
- insufficient parking provided
- massing and impact upon neighbours
- loss of daylight
- loss of green space that contributes positively to the area
- contrary to Design Code
- impact upon amenity of residents
- impact upon trees

9. Applicant's Supporting Information:

- Acoustics Report
- Affordable Housing Statement
- Arboricultural Impact Assessment and Method Statement
- Biodiversity Self-Assessment Form
- BNG Metric
- Design and Access Statement
- Financial Viability Statement
- Flood Risk Assessment
- Heritage Report
- Phase 1 Geo-Environmental Risk Assessment
- Planning Statement
- Preliminary Ecological Appraisal
- Sustainability Stage 2 Report
- Transport Statement
- Travel Plan
- Seniors Housing Need Planning Assessment
- Statement of Community Involvement

10. Officer's Assessment:

(a) Background and Proposed Development

10.1 The background to the development of this includes an outline planning permission (ref: 06/02770/OUT) that was granted for development of the wider Siddington Park site as a business park, which includes the current application site.

10.2 Further to this, outline planning permission for Phase 1 of the Integrated Retirement Community (Use Class C2) development and associated works was granted under reference 11/05716/OUT, reserved matters approved under reference 14/05481/REM, as well as a full planning permission for additional development within the Phase 1 boundary (ref: 16/01264/FUL). These permissions relate to the Phase 1 development that has been constructed immediately to the south and south-east of the application site.

10.3 With regard to the application site subject to this application, outline planning permission was granted for a C2 Use Class development, comprising a care home and assisted living units under reference 15/02532/OUT. This permission was not implemented.

10.4 Outline planning permission (ref: 17/00076/OUT) was also granted for the Phase 1 and 2 land for Assisted Living Units/Close Care Units. This was also not proceeded with.

10.5 Therefore, any previously granted outline permissions for the development of the Phase 2 site have expired. They are, however, material considerations in the determination of the current application.

10.6 The proposal includes the erection of 6 blocks of apartments, containing a total of 55 units.

Block 1

10.7 This would be two storeys in height and located closest to the roundabout off the A419, containing 3 units, each with 3 bedrooms.

Block 2

10.8 This would also provide accommodation on two floors, with a total of 8 units to include 2 x 1-bed; 4 x 2-bed and 2 x 3-bed units.

Block 3

10.9 11 units would be included within this building across three floors. The unit sizes would be 3 x 1-bed; 5 x 2-bed and 3 x 3-bed.

Block 4

10.10 Block 4 would be positioned towards the north-western corner of the site, with a mix of 3 and 4-storey heights, containing 15 units. This would include 3 x 1-bed; 7 x 2-bed and 5 x 3-bed.

Block 5

10.11 This block includes 9 units across three floors. The units provided would include 3 x 1-bed and 6 x 2-bed.

Block 6

10.12 This building also includes 9 units across three floors, including 3 x 1-bed and 6 x 2-bed.

10.13 The 55 units would, therefore, include 14 x 1-bed; 28 x 2-bed and 13 x 3-bed, with the height of the buildings varying between two and four storeys in height.

(b) Principle of Development

10.14 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that 'If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.' The starting point for the determination of an application would therefore be the current development plan for the District which is the Cotswold District Local Plan 2011-2031.

10.15 The site the subject of this application is situated outside of any Development Boundary as identified with the current Local Plan. The site also lies outside of a settlement, being considered separate from Cirencester, South Cerney and Siddington for the purposes of the Council's Housing Strategy. Therefore, Policy DS4 is of relevance to the consideration of the proposal, which states that:

'New-build open market housing will not be permitted outside Principal and Non-Principal Settlements unless it is in accordance with other policies that expressly deal with residential development in such locations.'

10.16 Notwithstanding this, the proposals are for Use Class C2 (Residential Institutions) development, the type of development proposed is addressed within the Local Plan's Housing policy set and paragraph 8.0.1 explains that "The purpose of this section is to guide delivery of the identified needs for housing in the District. Development will be required to provide an appropriate mix of dwelling sizes, tenures and types reflecting the overall Local Plan requirements and the requirements of the locality at the time of the development."

10.17 Policy H1 (Housing Mix & Tenure to Meet Local Needs) states that:-

1. 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. Developers will be required to comply with the Nationally Described Space Standard.

2. Any affordable accommodation with two or more bedrooms will be expected to be houses or bungalows unless there is a need for flats or specialist accommodation.

3. Proposals of more than 20 dwellings will be expected to provide 5% of dwelling plots for sale as serviced self or custom build plots unless demand identified on the Local Planning Authority's Self-Build and Custom Register, or other relevant evidence, demonstrates that there is a higher or lower level of demand for plots.

4. Starter Homes will be provided by developers in accordance with Regulations and National Policy and Guidance.

5. Exception sites on land that has been in commercial or industrial use, and which has not currently been identified for residential development, will be considered for Starter Homes.

10.18 Policy H2 (Affordable Housing) sets out the policy in relation to affordable housing contributions in all housing developments that provide 11 or more new dwellings (net) or have a combined gross floorspace of over 1,000sqm, and that such developments will be expected to contribute towards affordable housing provision to meet an identified need in the District and address the Council's

strategic objectives on affordable housing. The Policy states that the affordable housing requirement on all sites requiring a contribution, subject to viability, is up to 40% of new dwellings gross (on non-brownfield land).

10.19 Also relevant to the consideration of this application is Local Plan Policy H4 (Specialist Accommodation for Older People). This states that:-

'Proposals for specialist accommodation for older people, including sheltered and extra care housing, care homes and other appropriate models of accommodation for the elderly and those with particular needs will be permitted provided that the development:

- Meets a proven need for that type of accommodation
- Is designed to meet the particular requirements of residents with social, physical, mental and/or health care needs
- Is easily accessible to public transport, shops, local services, community facilities and social networks for residents, carers and their visitors and
- Where accommodation is provided on a freehold or leasehold basis, it should provide affordable housing in accordance with Policy H2. This includes proposals for self-contained units of accommodation within a residential institution (use class 2). In the case of sheltered accommodation and extra care accommodation a mix of tenures will be encouraged. Where a development site has been divided into parts, or is being delivered in phases, the site will be considered as a whole for the purpose of determining the appropriate affordable housing requirement.'

10.20 As the supporting text to Policy H4 explains (para. 8.4.5), "There is often confusion as to whether specialist accommodation for older persons falls into the use class defined as residential institutions (C2) or a dwelling house (C3). Nevertheless, development which creates living spaces that retain the essential characteristics of a self-contained dwelling, even if some care is provided, will be expected to provide affordable housing in accordance with Local Plan Policy H2". The current proposals are for self-contained apartments and therefore would be expected to contribute towards affordable housing provision.

10.21 Paragraph 8.4.1 of the current Local Plan supporting text for Policy H4 states that "The SHMA Update (April 2016) anticipates a dramatic growth in the older population in Cotswold District with higher levels of disability and health problems amongst older people. There is a requirement for 665 sheltered and extracare housing units between 2017 and 2031. This forms part of the OAN. There [sic] are also a requirement for 580 nursing and residential bedspaces between 2017 and 2031. This is in addition to the OAN. Identified needs are a

snapshot in time and applicants must refer to the latest evidence, such as future updates to the SHMA, when submitting planning applications. Specialist accommodation for older people should include a range of tenures and should not contribute to unbalanced communities."

10.22 With regard to need, the NPPF states the following at paragraphs 62 and 63:

62. To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

63. Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes.

10.23 In addition to the above, it is noted that the Government published a draft version of the NPPF on the 16th December 2025. The consultation period for the aforementioned document expires on the 10th March 2026 and it is anticipated that a final version of the NPPF will be released in Spring 2026. Whilst the draft NPPF is a consultation document, it is considered that the proposed policies within it are a material consideration and must be given a degree of weight at the present time.

10.24 The Gloucestershire Local Housing Needs Assessment (2020) (GLHNA) identifies that the population aged 75+ within the Cotswold District is likely to increase by 8,998 persons over the 20-year period 2021-41, and identified a need for 1,699 units of 'owned' sheltered housing and 149 units of 'owned' extra care units in Cotswold District by 2041.

10.25 The application has been supported by a Needs Assessment, which draws the conclusion that there is a current *'significant shortfall in the number of seniors housing units within the Cotswold local authority. Furthermore, content from Cotswold District Local Plan 2011 - 2031 documents also recognises a need to increase the provision of seniors housing. Population projections provided by*

the ONS estimate there will be significant growth in the 65+ and 75+ population which will further strengthen the argument for increased provision of specialised housing for the elderly.'

10.26 This has been assessed by the Strategic Housing team, who are in agreement with the conclusions, and are satisfied that a need for the development can be evidenced.

10.27 Notwithstanding the above, the Local Planning Authority has to have regard to policies in the National Planning Policy Framework (NPPF) when reaching a decision. The NPPF represents a significant material consideration. In particular, it is noted that the December 2024 update of the NPPF introduced a new standard method for calculating local housing need. Prior to the December changes to the NPPF, the Council could demonstrate a 7.3 year supply of housing land. However, as a result of the aforementioned changes, the Council can now only demonstrate a 1.8 year supply.

10.28 The new standard method requires that the Council has to deliver 1036 homes per annum as opposed to the 504 homes per annum requirement that existed prior to the December 2024 update. Moreover, the aforementioned update to the NPPF removed the wording in the document that enabled previous over-supply to be set against upcoming supply. The residual requirement for the remainder of the Local Plan period would have been 265 dwellings per annum (based on the Housing Land Supply Report August 2023) prior to the changes in December. The December changes to the NPPF therefore result in the Council having to deliver a far higher number of dwellings than that required prior to December 2024. As the supply figure is now under 5 years, it is necessary to have regard to paragraph 11 of the NPPF, which states:

11. Plans and decisions should apply a presumption in favour of sustainable development.

10.29 For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

10.30 Footnote 8 of the NPPF advises that 'out-of-date' for the purposes of paragraph 11 includes 'for applications involving the provision of housing, situations where: the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer as set out in paragraph 78): or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirements over the previous three years.' In light of this guidance, it is considered that the policies in the Local Plan controlling new housebuilding are out-of-date at the present time, and that paragraph 11 would be engaged in these circumstances.

10.31 With regard to 11 d) i., the site is not within either a conservation area or the Cotswolds National Landscape, whilst the nearest listed buildings are separated from the site by existing development. The site is within the Zone of Influence for the North Meadow Special Area of Conservation (SAC), however mitigation may be provided in respect of this, as discussed below.

10.32 In respect of 11 d) ii., and in the absence of a 5-year housing land supply, the site is within a relatively sustainable location, considering the Phase 1 development, and the ease of access to facilities within Cirencester.

10.33 Therefore, whilst the site is outside of any development boundary designated within the Local Plan, it is considered that the need for additional C2 housing provision is considered to have been demonstrated and, coupled with the current 5-year housing land supply within the District, the provision of 55 units would also weigh significantly in favour of the proposal being considered acceptable in principle.

(c) Affordable Housing

10.34 Policy H2 of the Local Plan requires that:

1. All housing developments that provide 11 or more new dwellings (net) or have a combined gross floorspace of over 1,000sqm will be expected to contribute towards affordable housing provision to meet the identified need in the District and address the Council's strategic objectives on affordable housing.

2. In rural areas, as defined under s157 of the Housing Act 1985, all housing developments that provide 6 to 10 new dwellings (net) will make a financial contribution by way of a commuted sum towards the District's affordable housing need subject to viability. Where financial contributions are required payment will be made upon completion of development.

3. The affordable housing requirement on all sites requiring a contribution, subject to viability is:

i. Up to 30% of new dwellings gross on brownfield sites; and
ii. Up to 40% of new dwellings gross on all other sites.

4. In exceptional circumstances, consideration may be given to accepting a financial contribution from the developer where it is justified that affordable housing cannot be delivered on-site, or that the District's need for affordable housing can be better satisfied through this route. A financial contribution will also be required for each partial number of affordable units calculated to be provided on site.

5. The type, size and mix, including the tenure split, of affordable housing will be expected to address the identified and prioritised housing needs of the District and designed to be tenure blind and distributed in clusters across the development to be agreed with the Council. It will be expected that affordable housing will be provided on site as completed dwellings by the developer, unless an alternative contribution is agreed, such as serviced plots.

6. Where viability is questioned or a commuted sum is considered, an "open book" assessment will be required. The local planning authority will arrange for an external assessment which will be paid for by the developer.

10.35 A Financial Viability Assessment has been provided with the application. Owing to the commercially sensitive financial content, this has not been put into the public domain.

10.36 However, the report concludes that *... the proposed scheme is unable to support any affordable housing. This is because the residual land value generated by a*

100% private scheme is below the Benchmark Land Value. The main reason for the viability conclusion is the high construction costs relative to the achievable sales values in this location.

10.37 The content of this report has been consulted upon by Officers with external consultants, who have confirmed that they concur with its findings. This has also been agreed by the Strategic Housing team, such that it is considered that the proposal would accord with Part 6 of Policy H2, and that no contribution towards affordable housing provision is required, either through the inclusion of on site units within the application, or a financial contribution towards off-site provision.

(d) Design and Impact upon Heritage Assets

10.38 Siddington Park House and Preston Mill are grade II listed buildings and are in proximity to the proposal site. The Local Planning Authority is therefore statutorily required to have special regard to the desirability of preserving these buildings and monuments, as well as their setting, and any features of special architectural or historic interest it may possess, in accordance with Section 16(2) of the Planning (Listed Building and Conservation Areas) Act 1990.

10.39 Preston Conservation Area is located to the opposite side of the A419 Cirencester Road and its setting is a planning consideration which could be impacted by long distance views.

10.40 Local Plan Policy EN10 Designated Heritage Assets is also relevant and states:

'1. In considering proposals that affect a designated heritage asset or its setting, great weight will be given to the asset's conservation in proportion with the importance of the asset.

2. Development proposals that sustain and enhance the character, appearance and significance of designated heritage assets (and their settings), and that put them to viable uses, consistent with their conservation, will be permitted.

3. Proposals that would lead to harm to the significance of a designated heritage asset or its setting will not be permitted, unless a clear and convincing justification of public benefit can be demonstrated to outweigh that harm. Any such assessment will take account, in the balance of material considerations:

- The importance of the asset

- The scale or harm; and
- The nature and level of the public benefit of the proposal.

10.41 Local Plan Policy EN11 Conservation Areas states 'Development Proposals, that would affect Conservation Areas and their settings, will be permitted provided they:

a. Preserve and where appropriate enhance the special character and appearance of the Conservation Area in terms of siting, scale, form, proportion, design, materials and the retention of positive features.

b. Include hard and soft landscape proposals, where appropriate, that respect the character and appearance of the Conservation Area

c. Will not result in the loss of open space, including garden areas and village greens, which make a valuable contribution to the character and/or appearance, and/or allow important views into or out of the Conservation Area.'

10.42 Local Plan Policy EN2 - Design of the Built and Natural Environment states that: 'Development will be permitted which accords with the Cotswold Design Code (Appendix D). Proposals should be of design quality that respects the character and distinctive appearance of the locality.'

10.43 With regard to the Cotswold Design Code:

- D.9: Careful study should be made of the context of any new development. Each site will have its own characteristics, and a specific landscape or townscape setting. Any proposed development should respond to this.
- D.10: Settlements are distinctive in how they sit within the landscape. They have their own unique layouts and patterns of streets. These characteristics should be reflected in the location and design of the new developments.
- D.14: In designing new development, close attention to the site and its setting should work at all levels, from overall principle, density and grain to the scale, form, roofscapes, elevations and detailed features of the buildings and then the landscaping surrounding them.
- D.16: New buildings should be carefully proportioned and relate to the human scale, and to their landscape or townscape context.
- D.17: Excessive or uncharacteristic bulk should be avoided. New buildings should generally not dominate their surroundings, but should complement the existing structures or landscape, and sit comfortably within their setting.
- D.18: The height of new buildings should respond to the local context.

10.44 Policy 2 of the Preston Neighbourhood Development Plan (NDP) requires that 'new development, including extensions to existing buildings, and conversions of farm buildings, should be of the highest design standards in accordance with the relevant policies of the Cotswold District Local Plan, including the Cotswold Design Code.'

10.45 Section 16 of the National Planning Policy Framework (NPPF) requires that Local Planning Authorities should take account of the desirability of sustaining or enhancing the significance of heritage assets, including their settings.

10.46 Paragraph 210 states 'In determining applications, local planning authorities should take account of:

a) The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation:

b) The positive contribution that the conservation of heritage assets can make to sustainable communities including their economic vitality; and

c) The desirability of new development making a positive contribution to local character and distinctiveness'.

10.47 Paragraph 212 states 'When considering the impact of a proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'.

10.48 Paragraph 213 states 'Any harm to or loss of the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification'.

10.49 Paragraph 215 states 'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposals'.

10.50 Paragraph 219 states 'Local planning authorities should look for opportunities for new development within Conservation Area and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.'

10.51 The NPPF in Annex 2 defines the Setting of a Heritage Asset as 'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, my affect the ability to appreciate the significance of an asset or may be neutral'.

10.52 Significance is defined in Annex 2 of the NPPF as 'the value of a heritage asset to this and future generations because of its heritage interest. That interest maybe archaeological, architectural, artistic or historic'.

10.53 Section 12 of the National Planning Policy Framework requires good design.

10.54 Paragraph 135 states that policies and decisions should ensure that developments:

- function well and add to the overall quality of an area;
- are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- are sympathetic to local character and history, including the surrounding built environment and landscape setting.

10.55 Having regard to Policy H1, developers are required to comply with the Nationally Described Space Standards (NDSS) on all residential units. These have been satisfied with regard to the floor space of each of the proposed units.

10.56 Preston Mill is a grade II listed building, which is close to the current outlined site, albeit that it is separated by the development of houses at Preston Leigh. The sluice and ponds relating to the Mill are largely to its front elevation and its location, alongside that of the River Churn, on the opposite side of the highway would indicate that its significance is unlikely to be physically affected.

10.57 However, in character and visual terms Preston Mill and Preston Mill Barn (on the opposite side of the village road to the Mill, but adjacent to the site) have a scale and relationship to each other and the village road which is important to the significance of the Mill's setting and the character of the area. Therefore, it is considered important that this scale and form is respected particularly in relation to proposed built form.

10.58 The proposal site is Phase 2 of the development of a Retirement Village, with Phase 1 having been completed. The Phase 2 site includes the area of the site to the west of the access road, which directly accesses from the A419 Cirencester Road. In this respect, the entrance to the site would be prominent

from the highway, alongside the Phase 1 development to the southeast of the site and lining the boundary of the Road are largely concealed by the protected tree line.

10.59 The Phase 1 development includes buildings of between 2 and 4 storeys in height, a total of 123 units, with their locations being carefully located in relation to their context, notably with the lower buildings located along the access road and adjacent to the listed building Siddington Park House. The Phase 2 proposal site also has two storey buildings (including Preston Mill) to the north and north-west of the site, and also opposite the access road within the site within Phase 1.

10.60 The design of the development has been amended since submission, owing to concerns over the scale, massing and appearance of the proposal, together with the impact upon the setting of the above mentioned heritage assets. These amendments have addressed a number of the concerns, although the Senior Conservation and Design Officer remains of the opinion that further alterations to the proposal would be required to address outstanding concerns that relate to the fenestration, which is detailed below:

10.60.1 With Phase 2 the scale, heights and mass of the proposed development on the site would be significantly greater than the existing buildings surrounding the site, as with Phase 1. This in turn is considered to causes a level of harm collectively to the settings of Preston Mill, Siddington Park House and Preston Conservation Area.

10.60.2 However, the level of harm has been mitigated to a degree by the proposed two storey heights and the lower massing of Block 1 representing a row of cottages utilising some Cotswold vernacular forms, proportions and details in local materials and to a lesser degree Block 2 which has greater mass and 2.5 storey height. On balance the locations and scale, mass and heights of Blocks 1 and 2 would cause a low level and no greater harm the settings of Preston Mill and Preston Conservation Area, than Phase 1.

10.60.3 Block 3 on balance would cause no greater harm than Phase 1 to the settings of Preston Mill or Preston Conservation Area directly, due to its lower height, mass and scale and its location more centrally to the development site.

10.60.4 However, Block 4 would cause a greater level of harm to the setting of Preston Mill due to their proximity to each other and their clear contrast in scale, mass and height, to each side of the village road to Siddington.

10.60.5 The lower section of Block 4 adjacent to Preston Leigh in conjunction with the trees which line the village road to Siddington, provides a level of mitigation, but the contrast in scale, mass and height, would still be evident and less than substantial harm would still be caused.

10.60.6 Blocks 5 and 6 are lower than Block 4 but would also line the road to Siddington, albeit set back behind the tree line. Block 6 is sited at an angle which lowers itsoverall visual mass, but the combined long elevations of Blocks 4 and 5 would be parallel to the road, collectively causing an additional level of harm. The setting of Preston Mill and how it is experienced includes the rural low-density character of the road to Siddington Village.

10.60.7 Therefore, it is considered that Block 4 would cause a greater level of less than substantial harm to the setting of Preston Mill as a listed building than the harm caused by Phase 1 and the remainder of Phase 2 on the settings of the designated heritage assets.

10.61 These concerns have been brought to the attention of the applicant, however no further amendments to the design have been forthcoming, and it has been requested that the application be determined on the basis of the submitted plans.

10.62 Having reviewed the concerns raised in respect of the design, the main issues relate to Blocks 5 and 6 in respect of their scale, mass, height and design.

10.63 However, when balancing these matters against the benefits of the proposal, which include the provision of 55 residential units, additional accommodation for the elderly, a financial contributions towards Library facilities, your Officers have concluded that, on balance, the proposal should be recommended for approval on the basis of these remaining design concerns. These blocks are located on lower-lying areas of land when viewed from the A419, and would also be separated from the South Cerney Road by existing tree and hedgerow screening, and it is considered that their wider impact would be mitigated by these factors.

(e) Landscape and Trees

10.64 As stated above, Policy EN2 of the Local Plan states that development will be permitted which accords with the Design Code (Appendix D). Proposals should be of design quality that respects the character and distinctive appearance of the locality and should respond to its landscape setting with regard to

proportion, density, grain, scale and form, as well as the architectural design of the buildings, and to the landscaping around them.

10.65 Policy EN4 of the Local Plan states that 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. This policy requires that 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, settlement patterns and heritage assets.

10.66 Policy EN7 (Trees, Hedgerows & Woodlands) states that development will not be permitted that fails to conserve and enhance trees of high landscape, amenity, ecological or historical value, veteran trees, hedgerows of high landscape, amenity, ecological or historical value, and/or woodland of high landscape, amenity, ecological or historical value. Where trees, woodland or hedgerows are proposed to be removed as part of development, compensatory planting will be required.

10.67 With regard to the Preston NDP, the site is within Area 6 within the Landscape Areas identified within the Plan. This states that:

'Sensitive receptors are users of A419 Ermin Way / Swindon Road, the lane to Siddington village and users of the public footpath within area 4b and village residents. Historically, Preston was an agricultural village surrounded by countryside and scattered isolated farmsteads. There has now been a significant amount of development in this area in recent years resulting in its agricultural setting being eroded both from the south-west and the west. Any further larger scale development to the north west of Preston Bridge i.e. adjacent to Tescos development would have the potential to link built development from Dobbies Garden Centre to Cirencester. However, by nature of the low lying land and its close proximity to the River Churn, development is anticipated to be unlikely.'

10.68 The site is not located within a specifically protected landscape and is relatively well-contained due to land levels and existing boundary trees. Nevertheless, good quality landscaping is important to the overall quality of the proposed development, as required by Local Plan Policy EN2, and would also help to address paragraph 136 of the NPPF, which requires opportunities new tree planting.

10.69 Landscaping details have been provided, which show additional tree planting across the application site, including further planting along the northern boundary of the site, beyond which lie the dwellings at Preston Leigh. Amongst the tree species to be planted include field maple, oak, beech, silver birch, crab apple and cherry trees. These details are considered to be acceptable.

10.70 The entire site is covered by a 2006 area Tree Preservation Order, (TPO), which means that all trees growing at the time the TPO was made will be protected. There are trees around the northern and western boundaries that provide screening value, which are proposed to be retained.

10.71 Reference has been made to works to fell 12 trees along the northern boundary of the site, which was granted under reference 25/02115/TPO. These works also included the pollarding to 3m in height of a lime tree, whilst the trees to be felled were all Cypress trees.

10.72 The survey undertaken and submitted with this application identified 52 trees along this boundary. In granting consent for the works to the trees, a condition was attached to the decision notice as follows:

10.72.1 Following the felling of the trees authorised by this consent, 12 new trees must be planted as replacements for the trees to be removed. The replacement trees may be selected from the following list of species or may be of an alternative species if agreed in writing with the Council's Tree Officer:

Oak (Querus robur)
Beech (Fagus sylvatica)
Birch (Betula sp)
Scots Pine (Pinus sylvestris)

10.72.2 The replacement trees must be a minimum Nursery standard size (8-10 cm in trunk circumference - British Standard 3936 - Part1: Nursery stock specification for trees and shrubs), at the time of planting and must be planted within a 10m radius of the felled trees during the planting season following, or at the time of felling the trees. They must be supported by a correctly installed stake and tree ties. The trees are to be staked, protected and mulched. All works to accord with BS 3936-1:1992 Nursery stock. Specification for trees and shrubs and BS 4428:1989 Code of practice for general landscape operations (excluding hard surfaces) and BS 8545:2014 Trees: from nursery to independence in the landscape -

Recommendations.

10.72.3 Should the replacement trees be removed, die or become severely damaged or seriously diseased, within 5 years of planting, they must be replaced by trees of a similar size and species to that originally planted.

10.72.4 Any modifications to the requirements of this condition must be agreed in writing with the Council's Tree Officer.

10.72.5 PLEASE NOTE: the requirement to replant is the responsibility of the tree owner even if another party has submitted the application.

10.72.6 The Council's Tree Officer should be notified in writing as soon as the tree planting has been carried out.

Reason: To ensure that the trees are replaced for the benefit of the amenity of the area and in order to preserve the visual amenities which exist at present on the site.

10.73 Therefore, replacement trees would be planted for each of the trees to be felled.

10.74 The site-specific tree that are proposed are considered to be acceptable in principle, although a condition is recommended requiring the submission of full details prior to the commencement of development.

(f) Residential Amenity

10.75 Policy EN2 and the Cotswold Design Code require consideration of the impact of development in terms of residential amenity, which is also referred to within paragraph 135 (f) of the NPPF.

10.76 The relationship between the proposed buildings and the Phase 1 development is considered to be acceptable. The only other properties affected are the dwellings at Preston Leigh, which is to the north of the site. All bar one of these dwellings are beyond either the 22m (for 2-storey development) of 28m (for 3-storey development) distance stipulated for habitable windows within the Cotswold Design Code, notwithstanding the protected trees along the boundary and additional proposed tree planting.

10.77 The one dwelling that is within this distance of No. 6, which is the westernmost of these properties, and closest to Block 4 within the Phase 2 development. This dwelling is approximately 20m distant from the nearest 3-storey high part of

Block 4, albeit that the orientation of No. 6 is such that the rear of the dwelling faces away from the application site. The side elevation to No. 6 has two windows, a secondary clear glazed within to the ground floor, and an obscure glazed first floor window.

10.78 With regard to Block 4, as originally proposed, there would have been open-sided terraces on each floor facing towards this neighbouring dwelling, notwithstanding the existing tree screening. However, these sides have now been enclosed, such that the only view out from these terraced areas would be towards Block 3 to the east.

10.79 Furthermore, shadow diagrams have been provided to demonstrate that there would be no material impact upon the amenities of these neighbouring properties to the north arising from the proposed development.

10.80 Therefore, it is considered that the proposal is acceptable with regard to any impact upon residential amenity, having regard to Policy EN2 of the Local Plan and paragraph 135 (f) of the NPPF.

(g) Biodiversity

10.81 Section 15 of the NPPF seeks to ensure development minimises the impact on and provided net gains for biodiversity.

10.82 Local Plan Policy EN8 supports development that conserves and enhances biodiversity and geodiversity, providing net gains where possible.

10.83 Policy EN9 requires consideration of the impact of development proposals upon internationally designated wildlife sites.

10.84 With regard to biodiversity net gain, the applicant has demonstrated a measurable net gain in habitat units (95.93%) can be achieved on-site. A 10-year landscape ecological management plan is recommended to secure appropriate establishment and on-going monitoring and management details, along with appropriate remedial measures if habitats fail. Bird and bat boxes are also recommended, although these features do not count towards a measurable net gain, the incorporation of these features will provide opportunities for protected and notable species on-site and deliver net gains in accordance with Chapter 15 of the NPPF and Local Plan Policy EN8.

10.85 In respect of protected and notable species, the preliminary ecological appraisal has confirmed the site provides limited/negligible opportunities for notable and

protected species. Despite this, woodland north and west of the application site will provide opportunities for protected and notable species therefore, site clearance and construction works should adhere to the precautionary mitigation measures detailed in the Council's precautionary method of working document.

10.86 In addition, the woodland provides suitable habitat for commuting nocturnal species namely, European protected bat species. As a result, a lighting condition is recommended, ensuring any external lighting is sensitively designed to minimise light spill towards the woodland parcels and newly erected bat boxes. Conditions are recommended to this effect.

10.87 The site is also within the Outer Zone of the North Meadow Special Area of Conservation, wherein a financial contribution is required to be paid to mitigate any potential impact upon this internationally designated wildlife site. The payment for this contribution is still awaited, therefore in the event of planning permission being granted, the decision notice may not be issued until this payment has been received, as per the recommendation. No objection is raised by either the Senior Biodiversity Officer or Natural England subject to this mitigation being made.

(h) Highways

10.88 Section 9 of the NPPF advocates sustainable transport, including safe and suitable accesses to all sites for all people. However, it also makes it clear that development should only be prevented or refused on highway grounds where there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network are 'severe'.

10.89 Local Plan Policy INF3 (Sustainable Transport) supports development that actively supports travel choices with priority to walking and cycling and access provided to public transport. Links with green infrastructure, PROWs and wider cycle networks should be provided. Development that would have a detrimental effect on the amenity of existing infrastructure will not be permitted.

10.90 Local Plan Policy INF4 (Highway Safety) supports development that is well integrated with the existing transport network and beyond the application site, avoiding severance resulting from mitigation and severe impact upon the highway network. Developments that create safe and secure layouts and access will be permitted.

10.91 Local Plan Policy INF5 (Parking Provision) seeks to ensure sufficient parking provision to manage the local road network.

10.92 The proposed additional residential units would use the existing entrance off the A419 Cirencester Road which serves Phase 1, with a total of 68 car parking spaces shown, including 9 disabled parking spaces.

10.93 The Highway Authority are raising no objection to the proposal, provided that the applicant submits a Travel Plan so as to promote alternative modes of transport to the private car, as well as a 'car club' for residents. This is also subject to a Legal Agreement, with the payment of a financial contribution (£30,320) in addition to a Monitoring Fee (£5000).

10.94 Therefore, the proposal is considered to accord with Policies INF4 and INF5 of the Local Plan, and Section 9 of the NPPF.

(i) Library Contribution

10.95 The County Council has requested a financial contribution towards Library facilities totalling £10,780. Should planning permission be granted, this will be secured by way of a S.106 Legal Agreement.

(j) CIL

10.96 This application is CIL liable and there will be a CIL charge payable. Section 143 of the Localism Act 2011 states that any financial sum that an authority has received, will, or could receive, in payment of CIL is a material 'local finance consideration' in planning decisions.

11. Conclusion:

11.1 Notwithstanding the outstanding concerns raised by the Senior Conservation and Design Officer, with particular regard to Blocks 5 and 6, when considering the planning balance, including the benefits that would arise from the proposal, including additional housing, accommodation for the elderly, biodiversity net gain, and a contribution towards Library facilities, at a time when the Local Planning Authority is unable to demonstrate a 5-year housing land supply, it is considered that the proposal would accord with the provisions of the Development Plan, alongside the NPPF, neither of which are outweighed by other material planning considerations.

11.2 The proposed development is considered to accord with the policies in the draft NPPF.

11.3 The recommendation is to grant planning permission, subject to the completion of the Legal Agreement to secure the payment of a financial contribution towards library facilities and a Travel Plan. Also awaited is the payment of the financial contribution to mitigate the impact of the development upon the North Meadow and Clattinger Farm SAC.

10. Proposed Conditions:

1. The development shall be started by 3 years from the date of this decision notice.

Reason: To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2. The development hereby approved shall be carried out in accordance with the following drawing numbers: 155388-STL-XX-00-DR-A-10005 P16; 155388-STL-XX-00-DR-A-10006 P16; 155388-STL-XX-00-DR-A-10575 P15; 155388_10000_P19; 155388_10001_P19 ; 155388_10002_P19; 155388_10003_P19; 155388_10004_P19; 155388_10008_P19; 155388_10500_P17; 155388_10501_P17; 155388_10510_P17; 155388_10511_P17; 155388_10512_P17; 155388_10520_P17; 155388_10521_P17; 155388_10522_P17; 155388_10530_P17; 155388_10531_P17; 155388_10532_P17; 155388_10533_P17; 155388_10540_P17; 155388_10541_P17; 155388_10542_P17; 155388_10550_P17; 155388_10551_P17; 155388_10552_P17; 155388_10560_P16; 155388_10561_P16; 155388_10562_P16; 155388_10563_P16; 155388_30000_P19; 841-ALA-00-XX-D-L-1001 REV P04; 841-ALA-00-XX-D-L-1002 REV P06; 841-ALA-00-XX-D-L-1003 REV P03; 841-ALA-00-XX-D-L-1004 REV P03; 841-ALA-00-XX-D-L-1007 REV P03; 841-ALA-00-XX-D-L-1008 REV P03; 841-ALA-00-XX-D-L-1009 REV P04; 841-ALA-00-XX-D-L-1010 REV P04; 841-ALA-00-XX-D-L-1011 REV P03; 841-ALA-00-XX-D-L-2004 REV P01; 841-ALA-00-XX-SP-L-0001 REV P02; 841-ALA-ZZ-ZZ-D-L-1012 REV P03; 841-ALA-ZZ-ZZ-D-L-1013 REV P03; 841-ALA-ZZ-ZZ-D-L-1101 REV P02; 841-ALA-ZZ-ZZ-D-L-1102 REV P02 and 841-ALA-ZZ-ZZ-D-L-1103 REV P02.

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

3. Prior to the construction of any external wall of the development hereby approved, samples of the proposed walling materials to include natural Cotswold stone to Block 1, artificial Cotswold stone to the remainder of the buildings, render and timber boarding, shall be submitted to and approved in writing by the Local Planning Authority and only the approved materials shall be used.

Reason: To ensure that, in accordance with Cotswold District Local Plan Policy EN2, the development will be constructed of materials of a type, colour, texture and quality that will be appropriate to the site and its surroundings.

4. Prior to the construction of any external wall of the development hereby approved, samples of the proposed roofing materials to include natural blue slates, artificial Cotswold stone slates and metal roofing material samples for flat roofed elements, including bays and dormers, shall be submitted to and approved in writing by the Local Planning Authority and only the approved materials shall be used.

The artificial Cotswold stone slates shall be laid in diminishing courses.

Reason: To ensure that, in accordance with Cotswold District Local Plan Policy EN2, the development will be constructed of materials of a type, colour, texture and quality that will be appropriate to the site and its surroundings.

5. Prior to the construction of any external wall of the development hereby approved, a sample panel of walling of at least one metre square in size showing the proposed stone colour, coursing, bonding, treatment of corners, method of pointing and mix and colour of mortar shall be erected on the site and subsequently approved in writing by the Local Planning Authority and the walls shall be constructed only in the same way as the approved panel. The panel shall be retained on site until the completion of the development.

Reason: To ensure that in accordance with Cotswold District Local Plan Policy EN2, the development will be constructed of materials of a type, colour, texture and quality and in a manner appropriate to the site and its surroundings. Retention of the sample panel on site during the work will help to ensure consistency.

6. Prior to the construction of any external wall of the development hereby approved, a sample panel of boundary walling of at least one metre square in size showing the proposed stone colour, coursing, bonding, treatment of corners, method of pointing and mix and colour of mortar shall be erected on the site and subsequently approved in writing by the Local Planning Authority and the walls shall be constructed only in the same way as the approved panel. The panel shall be retained on site until the completion of the development.

Reason: To ensure that in accordance with Cotswold District Local Plan Policy EN2, the development will be constructed of materials of a type, colour, texture and quality and in a manner appropriate to the site and its surroundings. Retention of the sample panel on site during the work will help to ensure consistency.

7. Prior to the construction of any external wall of the development hereby approved, a sample panel of the timber panelling of at least one metre square in size showing the size, shape and arrangement of timber boards, treatment of corners shall be erected on site and subsequently approved in writing by the Local Planning Authority. The timber panelling shall be constructed only in the same way as the approved panel. The panel shall be retained on site until the completion of the development.

Reason: To ensure that in accordance with Cotswold District Local Plan Policy EN2, the development will be constructed of materials of a type, colour, texture and quality and in a manner appropriate to the site and its surroundings. Retention of the sample panel on site during the work will help to ensure consistency.

8. No external woodwork shall be installed in the development hereby approved, until a sample of the external woodwork finished in the proposed colour has first been submitted to and approved in writing by the Local Planning Authority. The external woodwork shall be finished fully in accordance with the approved details within one month of its installation and shall be retained as such thereafter unless a similar alternative is first agreed in writing by the Local Planning Authority.

Reason: To ensure that, in accordance with Cotswold District Local Plan Policy EN2, the development will be constructed of materials of a type, colour, texture and quality that will be appropriate to the site and its surroundings.

9. Prior to the insertion of any doors, screens or windows (including bay windows and dormer windows) hereby approved their design details shall be submitted to and approved in writing by the Local Planning Authority. The design details shall be accompanied by drawings to a minimal scale of 1:5 with full size moulding cross section profiles, elevations and sections to show window head, surround and cill, manner of opening, window joinery design details including glazing bars, materials and finish and extent of recess within the openings. The development shall be carried out in accordance with the approved details and retained thereafter.

Reason: To ensure the development is completed in a manner sympathetic to the site and its surroundings in accordance with Cotswold District Local Plan Policy EN2.

10. No eaves, ridges or verges, parapets, rooflights, flues or vents hereby approved shall be constructed until their design and materials/finishes have been submitted to and approved in writing by the Local Planning Authority. The design and details shall be accompanied by drawings to a minimum scale of 1:5 with full moulding cross sectional profiles, elevations and sections. The development shall only be carried out in accordance with the approved details and retained as such at all times.

Reason: To ensure the development is completed in a manner sympathetic to the site and its surroundings in accordance with Cotswold District Local Plan Policy EN2.

11. No bays, balconies, dormers, porches, canopies, parapets, or chimneys hereby approved shall be constructed until their design and materials/finishes have been submitted to and approved in writing by the Local Planning Authority. The design and details shall be accompanied by drawings to a minimum scale of 1:5 with full moulding cross sectional profiles, elevations and sections. The development shall only be carried out in accordance with the approved details and retained as such at all times.

Reason: To ensure the development is completed in a manner sympathetic to the site and its surroundings in accordance with Cotswold District Local Plan Policy EN2.

12. Prior to installation, design details for rainwater goods including materials and finish shall be submitted to and approved in writing by the Local Planning Authority. The design and details shall be accompanied by drawings to a minimum scale of 1:5 with full moulding cross sectional profiles, elevations and sections. The development shall only be carried out in accordance with the approved details and retained as such at all times.

Reason: To ensure the development is completed in a manner sympathetic to the site and its surroundings in accordance with Cotswold District Local Plan Policy EN2.

13. Prior to installation, design details for rooflights and solar panels including materials and finish shall be submitted to and approved in writing by the Local Planning Authority. The design and details shall be accompanied by drawings to a minimum scale of 1:5 with full moulding cross sectional profiles, elevations and sections. The development shall only be carried out in accordance with the approved details and retained as such at all times.

Reason: To ensure the development is completed in a manner sympathetic to the site and its surroundings in accordance with Cotswold District Local Plan Policy EN2.

14. The new rooflights shall be of a design which, when installed, shall not project forward of the roof slope in which the rooflights are located and shall be permanently retained as such thereafter.

Reason: To ensure the development is completed in a manner sympathetic to the site and its surroundings in accordance with Cotswold District Local Plan Policy EN2.

15. Prior to installation, design details shall be submitted to and approved in writing by the Local Planning Authority to include the materials and finish for gates, railings and fences. The design and details shall be accompanied by drawings to a minimum scale of 1:5 with full moulding cross sectional profiles, elevations and sections. The development shall only be carried out in accordance with the approved details and retained as such at all times.

Reason: To ensure the development is completed in a manner sympathetic to the site and its surroundings in accordance with Cotswold District Local Plan Policy EN2.

16. No bargeboards or eaves fascia shall be used in the proposed development.

Reason: To ensure the development is completed in a manner sympathetic to the site and its surroundings in accordance with Cotswold District Local Plan Policy EN2.

17. All door and window frames shall be recessed a minimum of 75mm into the external walls of the building and shall be permanently retained as such thereafter.

Reason: To ensure the development is completed in a manner sympathetic to the site and its surroundings in accordance with Cotswold District Local Plan Policy EN2.

18. Prior to installation, design details, materials and finishes of the bin and mobility scooter stores shall be submitted to and approved in writing by the Local Planning Authority. The design and details shall be accompanied by drawings to a minimum scale of 1:5 with full moulding cross sectional profiles, elevations and sections. The development shall only be carried out in accordance with the approved details and retained as such at all times.

Reason: To ensure the development is completed in a manner sympathetic to the site and its surroundings in accordance with Cotswold District Local Plan Policy EN2.

19. Notwithstanding the submitted details, prior to the first use/occupation of the development hereby approved, a comprehensive landscape scheme shall be approved in writing by the Local Planning Authority. The scheme must show the location, size and condition of all existing trees and hedgerows on and adjoining the land and identify those to be retained, together with measures for their protection during construction work. It must show details of all planting areas, tree and plant species, numbers and planting sizes. The proposed means of enclosure and screening should also be included, together with details of any mounding, walls and fences and hard surface materials to be used throughout the proposed development.

Reason: To ensure the development is completed in a manner that is sympathetic to the site and its surroundings in accordance with Cotswold District Local Plan Policy EN2.

20. The entire landscaping scheme shall be completed by the end of the planting season immediately following the completion of the development or the site being brought into use, whichever is the sooner.

Reason: To ensure that the landscaping is carried out and to enable the planting to begin to become established at the earliest stage practical and thereby achieving the objective of Cotswold District Local Plan Policy EN4.

21. Any trees or plants shown on the approved landscaping scheme to be planted or retained which die, are removed, are damaged or become diseased, or grassed areas which become eroded or damaged, within 5 years of the completion of the approved landscaping scheme, shall be replaced by the end of the next planting season. Replacement trees and plants shall be of the same size and species as those lost, unless the Local Planning Authority approves alternatives in writing.

Reason: To ensure that the planting becomes established and thereby achieves the objective of Cotswold District Local Plan Policy EN2.

22. A 10-year Landscape and Ecological Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority prior to any above ground works of the development hereby approved being undertaken. The plan shall be prepared in accordance with the principles set out in the Biodiversity Gain Plan and must include, but not necessarily be limited to, the following information:

i. Description and evaluation of features to be managed, including locations shown on a site map;
ii. Establishment details, including preparation of the land;
iii. Landscape and ecological trends and constraints on site that might influence management;
iv. Aims and objectives of management, including ensuring the delivery of at least a 10% net gain in habitat units;
v. Appropriate management options for achieving the aims and objectives;
vi. Prescriptions for all management actions;
vii. A work schedule matrix (i.e. an annual work plan) capable of being rolled forward over 5- or 10-year periods;
viii. Details of the body or organisation responsible for the implementation of the plan;

ix. Ongoing monitoring of delivery of the habitat enhancement and creation details to achieve net gain as well as details of possible remedial measures that might need to be put in place; and
x. Timeframe for reviewing the plan.

The LEMP shall be implemented in accordance with the approved details and all habitats shall be retained in that manner thereafter. Notice in writing shall be given to the Council when the habitat creation and enhancement works as set out in the Biodiversity Gain Plan have commenced and once all habitat creation and enhancements have been completed.

Reason: To secure the delivery of at least a 10% biodiversity net gain through successful establishment and management of all newly created and enhanced habitats in accordance with Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021), paragraphs 187, 192 and 193 of the NPPF, and Local Plan Policy EN8.

23. Prior to the commencement of the development hereby approved (including demolition and all preparatory work), a scheme for the protection of retained trees, in accordance with BS5837:2012, including a tree protection plan(s) (TPP) and an arboricultural method statement (AMS) shall be submitted to and approved in writing by the Local Planning Authority.

Specific issues to be dealt with in the TPP and AMS:

a) Full details of any facilitation pruning;
b) Location and installation of services, utilities and drainage;
c) Details of construction within the RPA or that may impact on the retained trees;
d) A full specification for the construction of any roads, parking areas and hard surfacing, including details of the no dig-specification and extent of the areas of the roads, parking areas and hard surfacing to be constructed using a nodig specification. Details shall include relevant sections through them;
e) Detailed levels and cross-sections to show that the raised levels of surfacing, where the installation of no-dig surfacing within RPAs is proposed,
demonstrating that they can be accommodated where they meet with any adjacent hard surfacing or structures;
f) A specification for protective fencing to safeguard trees during both demolition and construction phases and a plan indicating the alignment of the protective fencing;
g) Tree protection during construction indicated on the TPP with construction activities clearly identified as prohibited in this area;

h) Details of site access, temporary parking, on site welfare facilities, loading, unloading and storage of equipment, materials, fuels, waste as well as any areas to be used for concrete mixing and fires;
i) Details of any boundary treatments within RPAs;
j) Methodology and detailed assessment of any root pruning;
k) Details of arboricultural supervision and inspection by a suitably qualified arboriculturist;
l) Methods to improve the rooting environment for retained and proposed trees and landscaping.

The development thereafter shall be implemented in strict accordance with the approved details.

Reason: Required prior to the commencement of development to satisfy the Local Planning Authority that the trees to be retained will not be damaged during demolition or construction and to protect and enhance the appearance and character of the site and locality, in accordance with Policies EN1 and EN7 of the Cotswold District Local Plan and pursuant of section 197 of the Town and Country Planning Act 1990.

24. Prior to any above ground works of the development hereby approved being undertaken, details of the provision of 4no. integrated swift bricks on north or east-facing elevations and 4no. integrated bat roosting features (e.g. bat tiles, bat boxes or bat tubes) on south or southeast-facing elevations within the walls of the new buildings shall be submitted to the Local Planning Authority for approval. The details shall include a drawing showing the types of features, their locations and positions within the site, and a timetable for their provision. The approved details shall be implemented prior to first use of the development hereby approved and thereafter permanently retained.

Reason: To provide additional nesting and roosting opportunities for birds and bats as biodiversity enhancements in accordance with paragraphs 187, 192 and 193 of the National Planning Policy Framework, Policy EN8 of the Cotswold District Local Plan and Section 40 of the Natural Environment and Rural Communities Act 2006.

25. No development shall take place until a site-specific Construction Management Plan has been submitted to and been approved in writing by the Local Planning Authority. The plan must cover (at a minimum) noise, dust, vibration, odour, waste management, recycling, deliveries, site storage and site welfare. The plan must demonstrate the adoption and use of the best practicable means to reduce any adverse impact to the surrounding environment and community. No construction machinery shall be operated on the site before the 07:00 hours on weekdays, 08:30

hours on Saturdays, nor after 18:00 hours on weekdays and 13:00 hours on Saturdays, and at no time on Sundays, Bank or Public Holidays.

Reason: To protect the amenity of the locality, especially for people living and/or working nearby, in accordance with Cotswold District Local Plan EN15 and the provisions of the NPPF.

26. The development shall be undertaken in accordance with the recommendations in Cotswold District Council's Precautionary Method of Working document. All the recommendations shall be implemented in full, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that biodiversity is protected in accordance with the Wildlife and Countryside Act 1981 (as amended), Circular 06/2005, paragraphs 187, 192 and 193 the National Planning Policy Framework, Policy EN8 of the Cotswold District Local Plan 2011-2031 and in order for the Council to comply with Part 3 of the Natural Environment and Rural Communities Act 2006.

27. Prior to the installation of external lighting for the development hereby approved, an external lighting plan shall be submitted to and approved in writing by the Local Planning Authority. The details shall show how and where external lighting will be installed (including the type of lighting), so that it can be clearly demonstrated that areas to be lit will not disturb or prevent nocturnal species using wildlife corridors. All external lighting shall be installed only in accordance with the specifications and locations set out in these details.

Reason: To protect nocturnal wildlife in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife and Countryside Act 1981 (as amended), Circular 06/2005, paragraphs 187, 192 and 193 of the National Planning Policy Framework (Chapter 15), Policy EN8 of the Cotswold District Local Plan 2011-2031 and in order for the Council to comply with Part 3 of the Natural Environment and Rural Communities Act 2006

28. The Residential Travel Plan hereby approved, dated [Insert] shall be implemented and monitored in accordance with the regime contained within the Plan. In the event of failing to meet the targets within the Plan a revised Plan shall be submitted to and approved in writing by the Local Planning Authority to address any shortfalls, and where necessary make provision for and promote improved sustainable forms of access to and from the site. The Plan thereafter shall be implemented and updated in agreement with the Local Planning Authority and thereafter implemented as amended.

Reason: To reduce vehicle movements and promote sustainable access in accordance with Policy INF3 of the Cotswold District Local Plan and Section 9 of the NPPF.

29. The Noise Impact Assessment (NIA) dated 15/8/2025, as hereby approved, shall be strictly adhered to. Noise mitigation measures outlined within the NIA shall be installed prior to the first occupation of the site and thereafter maintained inline with the manufacturer's guidelines. This includes the installation of the stated "mixed mode ventilation systems to supplement the airflow through the trickle ventilators" to properties where compliance with the requirements of BS 8233: 2014 (Guidance on sound insulation and noise reduction for buildings) cannot be complied with, with windows open.

Reason: To protect the amenity of the locality, especially for people living and/or working nearby, in accordance with Cotswold District Local Plan EN15 and the paragraphs 135 (f) and 198 of the NPPF.

30. Prior to the erection of any external walls of the development hereby permitted, details of the energy efficiency measures to be introduced shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be installed in the development fully in accordance with the approved details prior to the occupation of the development hereby permitted.

Reason: In order to ensure the creation of an energy efficient development that addresses the impact of climate change.

31. Demolition or construction works shall not take place outside 7:30 hours to 18:00 hours Mondays to Fridays and 8:00 hours to 13:00 hours on Saturdays, or at any time on Sundays or Bank Holidays.

Reason: To protect the amenity of the locality, especially for people living and/or working nearby, in accordance with Cotswold District Council Plan Policy EN15.

32. For purposes of clarity and the avoidance of doubt, the application site, as a planning unit, shall be used only for C2 (Residential Institutions) use, and for no other purpose, including any other purpose in Class C3 (Dwelling Houses), of the Schedule to the Town and Country Planning (Use Classes) Order 2010 or the equivalent to that Class in any statutory instrument amending or replacing the 2010 Order or any other change of use permitted by the Town and Country Planning (General Permitted Development) Order 2015.

Reason: It is essential that the Local Planning Authority retains control over the use of the development because of its rural location, in accordance with Cotswold District Local Plan Policy DS4 and the NPPF.

Informatives:

1. Please note that the proposed development set out in this application is liable for a charge under the Community Infrastructure Levy (CIL) Regulations 2010 (as amended). A CIL Liability Notice will be sent to the applicant, and any other person who has an interest in the land, under separate cover. The Liability Notice will contain details of the chargeable amount and how to claim exemption or relief, if appropriate. There are further details on this process on the Council's website at www.cotswold.gov.uk/CIL

2. The applicant is reminded that, under the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended), it is an offence to (amongst other things): deliberately capture, disturb, injure, or kill great crested newts; damage or destroy a breeding or resting place; intentionally or recklessly obstruct access to a resting or sheltering place. Planning permission for a development does not provide a defence against prosecution under this legislation. Should great crested newts be found at any stage of the development works, then all works should cease, and a professional and/or suitably qualified and experienced ecologist (or Natural England) should be contacted for advice on any special precautions before continuing, including the need for a licence

3. The Developer is requested to erect a sign at the boundary of the new estate street with the nearest public highway providing the Developer's contact details and informing the public that the County Council is not responsible for the maintenance of the street.

4. IMPORTANT: BIODIVERSITY NET GAIN CONDITION - DEVELOPMENT CANNOT COMMENCE UNTIL A BIODIVERSITY GAIN PLAN HAS BEEN SUBMITTED (AS A CONDITION COMPLIANCE APPLICATION) TO AND APPROVED BY COTSWOLD DISTRICT COUNCIL.

The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for the development of land in England is deemed to have been granted subject to the condition "(the biodiversity gain condition") that development may not begin
unless:

(a) a Biodiversity Gain Plan has been submitted to the planning authority, and

(b) the planning authority has approved the plan in writing.

The planning authority, for the purposes of determining whether to approve a Biodiversity Gain Plan if one is required in respect of this permission would be Cotswold District Council. There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. Based on the information available this permission is considered to be one which will require the approval of a biodiversity gain plan before development is begun because none of the statutory exemptions or transitional arrangements are considered to apply. If the onsite habitats include irreplaceable habitats (within the meaning of the Biodiversity Gain Requirements (Irreplaceable Habitats) Regulations 2024) there are additional requirements for the content and approval of Biodiversity Gain Plans. Advice about how to prepare a Biodiversity Gain Plan and a template can be found at https://www.gov.uk/guidance/submit-a-biodiversity-gain-plan.

The applicant will need to apply to approve the details reserved by the 10-year Landscape and Ecological Management Plan and the Biodiversity Gain Plan at the same time. A step-by-step guide on how to apply for approval of conditions can be found here:

https://www.cotswold.gov.uk/planning-and-building/planning-permission/step-by-step-guideto-planning-permission/

Cotswold District Council's Precautionary Method of Working document can be found here:

https://www.cotswold.gov.uk/planning-and-building/wildlife-and-biodiversity/biodiversityspecifications/

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NORTH

Disclaimer: Site boundaries have been based on Topographic information provided by the client. Stride Treglown will not take responsibility for any inaccuracy.



STATUS	REV	DATE	DESCRIPTION
PL	P19	30/05/25	Post Planning Submission Comments FINAL Issue
PL	P18	15/05/25	Post Planning Draft Issue
PL	P16	22/08/24	Boundary Rev - PLANNING ISSUE
PL	P15	16/08/24	PLANNING ISSUE

CLIENT
Rangeford Villages

REVISED BY
NT

CHECKED BY
DP

ORIGINATOR NO
155388

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PROJECT
Siddington Park Phase 2
Cirencester

DRAWING TITLE
Proposed Site Plan

STATUS CODE
PL : Authorized and accepted

SCALE
1 : 250@A0

DRAWING USAGE:

PROJECT - ORIGINATOR - VOLUME - LEVEL - TYPE - ROLE - CLASS. - NUMBER
155388-STL-XX-00-DR-A-ZZ-10008

STATUS _ REVISION
PL_P19

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Elevation 2
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Elevation 3
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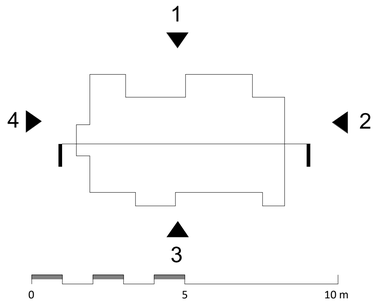
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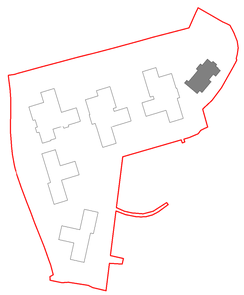


Section 1
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1. Cotswold style recon stone wall
2. Cotswold style artificial slates
3. Treated timber slats
4. Powder coated composite window
5. Cotswold 'Dry stone wall'

KEY PLAN





STATUS	REV	DATE	DESCRIPTION
PL	P17	30/05/25	Post Planning Submission Comments FINAL Issue
PL	P16	15/05/25	Post Submission Changes
PL	P15	16/08/24	PLANNING ISSUE

CLIENT
Rangeford Villages

REVISED BY
SAH

CHECKED BY
DP

ORIGINATOR NO
155388

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PROJECT
Siddington Park Phase 2

DRAWING TITLE
GA Elevations and Sections - Block 1 Typical Cottage

STATUS CODE
PL : Authorized and accepted

SCALE
As indicated@A1

DRAWING USAGE: *PLANNING*

PROJECT - ORIGINATOR - VOLUME - LEVEL - TYPE - ROLE - CLASS. - NUMBER
155388-STL-A-ZZ-DR-A-ZZ-10501

STATUS _ REVISION
PL_P17

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STATUS	REV	DATE	DESCRIPTION
PL	P15	16/08/24	PLANNING ISSUE
PL	P16	15/05/25	Post Submission Changes
PL	P17	30/05/25	Post Planning Submission Comments FINAL Issue



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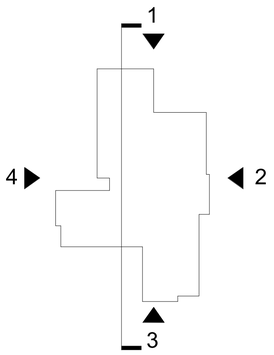


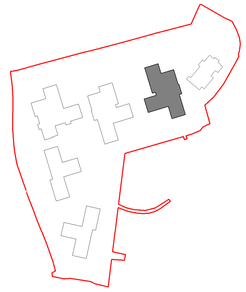
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Section 1
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KEY PLAN





1. Cotswold style recon stone wall
2. Cotswold style artificial slates
3. Treated timber slats
4. Metal balconies
5. Powder coated composite window

TITLE: GA Elevations and Section - Block 2
PROJECT: Siddington Park Phase 2
CLIENT: Rangeford Villages

REVISED BY: NT
CHECKED BY: DP
ORIGINATOR NO: 155388

SUITABILITY STATUS: PL : Authorized and accepted
DRAWING USAGE: *PLANNING*
SCALE: As indicated@A1

PROJECT-ORIGINATOR-VOLUME-LEVEL-TYPE-ROLE-CLASS.-NUMBER
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STATUS_REVISION: PL_P17

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STATUS	REV	DATE	DESCRIPTION
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PL	P17	30/05/25	Post Planning Submission Comments FINAL Issue

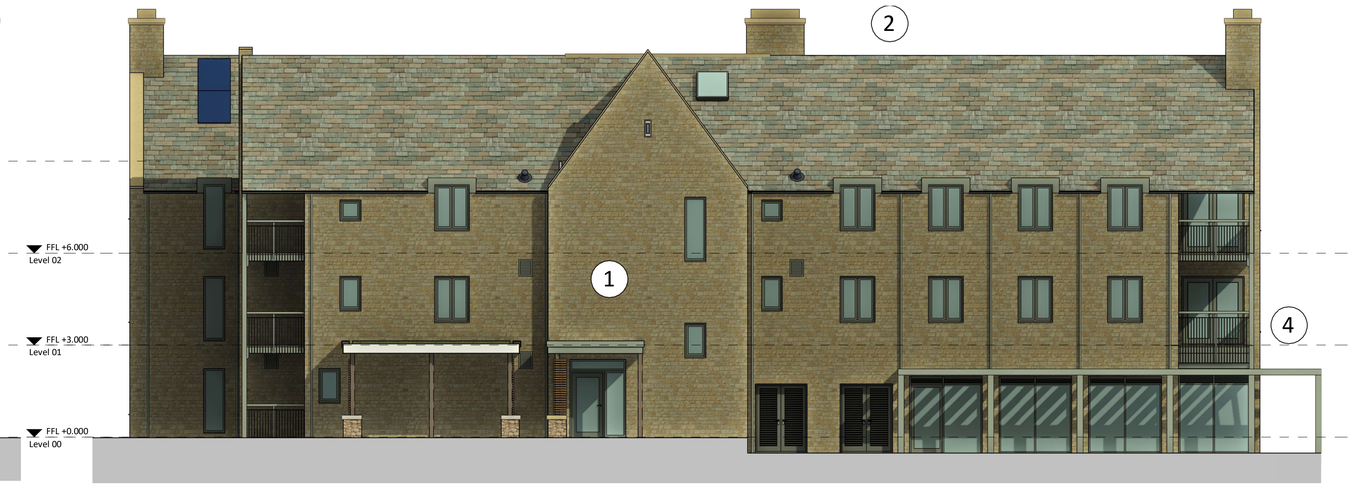


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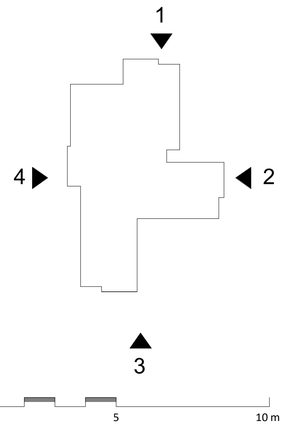
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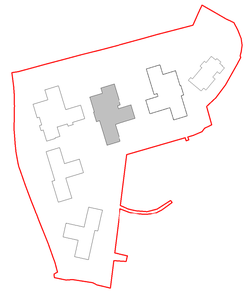


Elevation 4
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Section 1
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KEY PLAN





1. Cotswold style recon stone wall
2. Cotswold style artificial slates
3. Treated timber slats
4. Metal balconies
5. Powder coated composite window
6. Cotswold 'Dry stone wall'

TITLE: GA Elevations and Section - Block 3
PROJECT: Siddington Park Phase 2
CLIENT: Rangeford Villages

REVISED BY: NT
CHECKED BY: DP
ORIGINATOR NO: 155388

SUITABILITY STATUS: PL : Authorized and accepted
DRAWING USAGE: *PLANNING*
SCALE: As indicated@A1

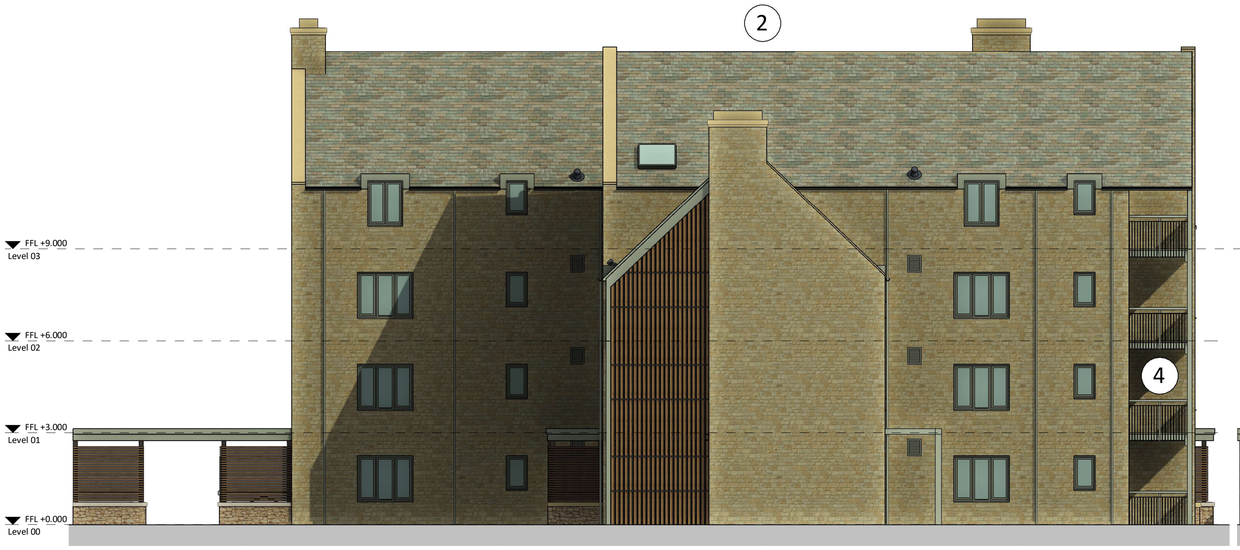
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155388-STL-B-ZZ-DR-A-ZZ-10522
STATUS_REVISION: PL_P17

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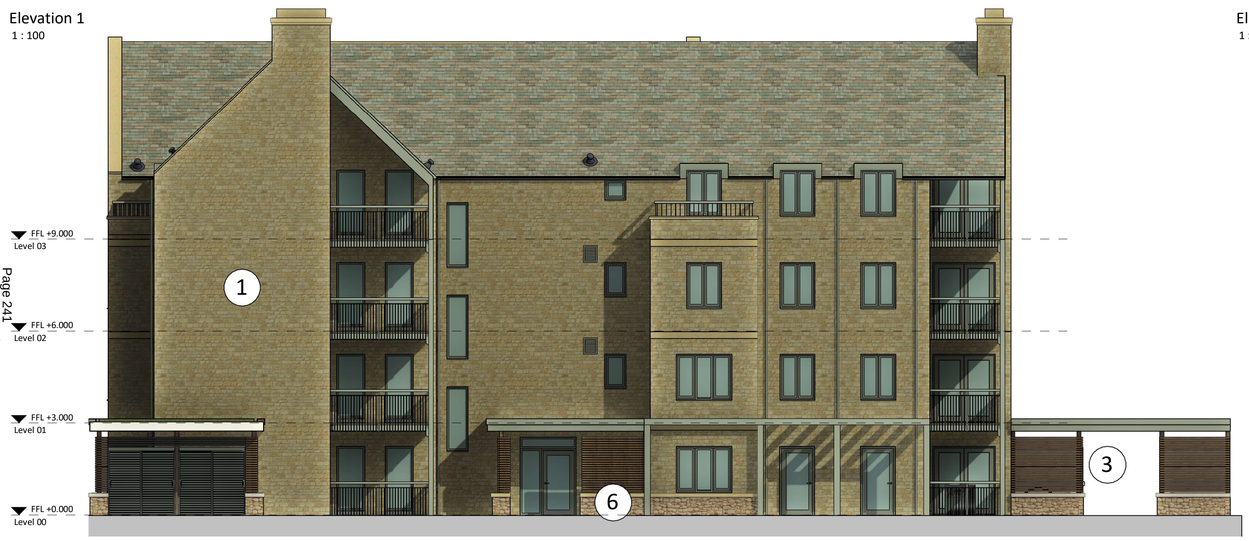
STATUS	REV	DATE	DESCRIPTION
PL	P15	16/08/24	PLANNING ISSUE
PL	P16	15/05/25	Post Submission Changes
PL	P17	30/05/25	Post Planning Submission Comments FINAL Issue



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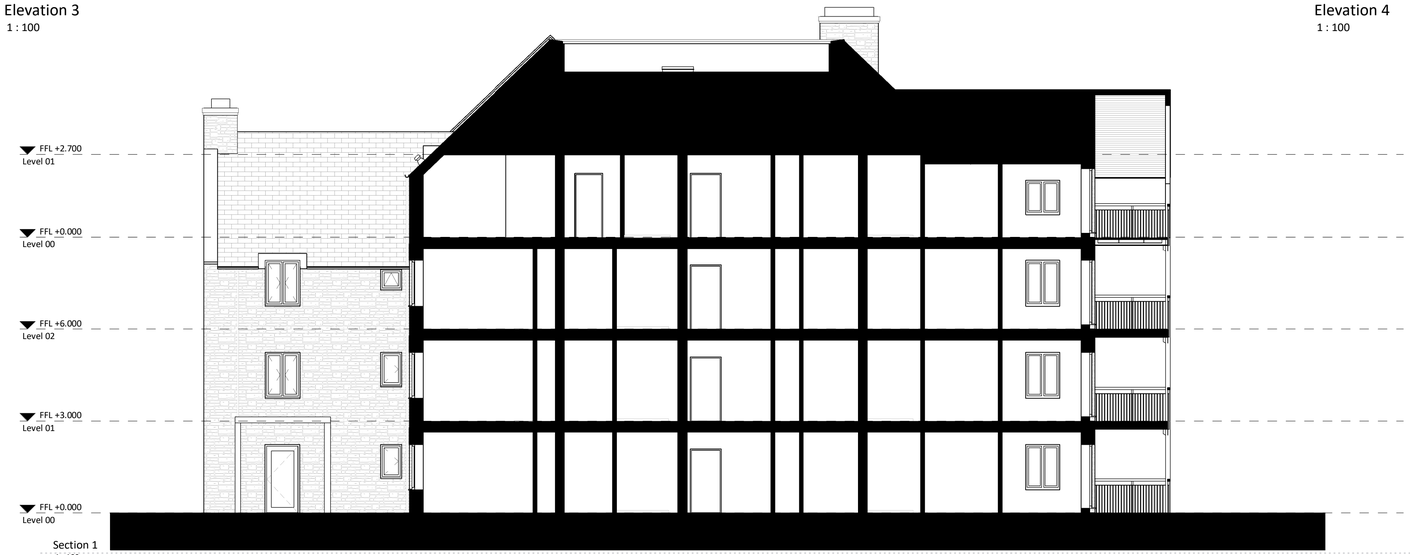
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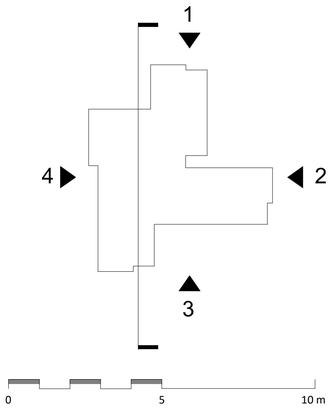


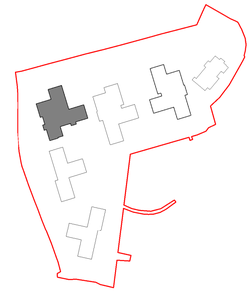
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Section 1
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KEY PLAN





1. Cotswold style recon stone wall
2. Cotswold style artificial slates
3. Treated timber slats
4. Metal balconies
5. Powder coated composite window
6. Cotswold 'Dry stone wall'
7. Profiled metal screening and detailing to terraces

TITLE: GA Elevations and Section - Block 4
PROJECT: Siddington Park Phase 2
CLIENT: Rangeford Villages

REVISED BY: NT
CHECKED BY: DP
ORIGINATOR NO: 155388

SUITABILITY STATUS: PL : Authorized and accepted
DRAWING USAGE: *PLANNING*
SCALE: As indicated@A1

PROJECT-ORIGINATOR-VOLUME-LEVEL-TYPE-ROLE-CLASS.-NUMBER
155388-STL-B-ZZ-DR-A-ZZ-10533
STATUS_REVISION: PL_P17

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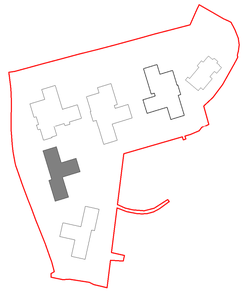


Elevation 4
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Section 1
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KEY PLAN



1. Cotswold style recon stone wall
2. Cotswold style artificial slates
3. Treated timber slats
4. Metal balconies
5. Powder coated composite window
6. Cotswold 'Dry stone wall'

STATUS	REV	DATE	DESCRIPTION
PL	P17	D30/05/25	Post Planning Submission Comments FINAL Issue
PL	P16	15/05/25	Post Submission Changes
PL	P15	16/08/24	PLANNING ISSUE

CLIENT
Rangeford Villages

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ORIGINATOR NO
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PROJECT
Siddington Park Phase 2

DRAWING TITLE
GA Elevations and Section - Block 5

STATUS CODE
PL : Authorized and accepted

SCALE
As indicated@A1

DRAWING USAGE: *PLANNING*

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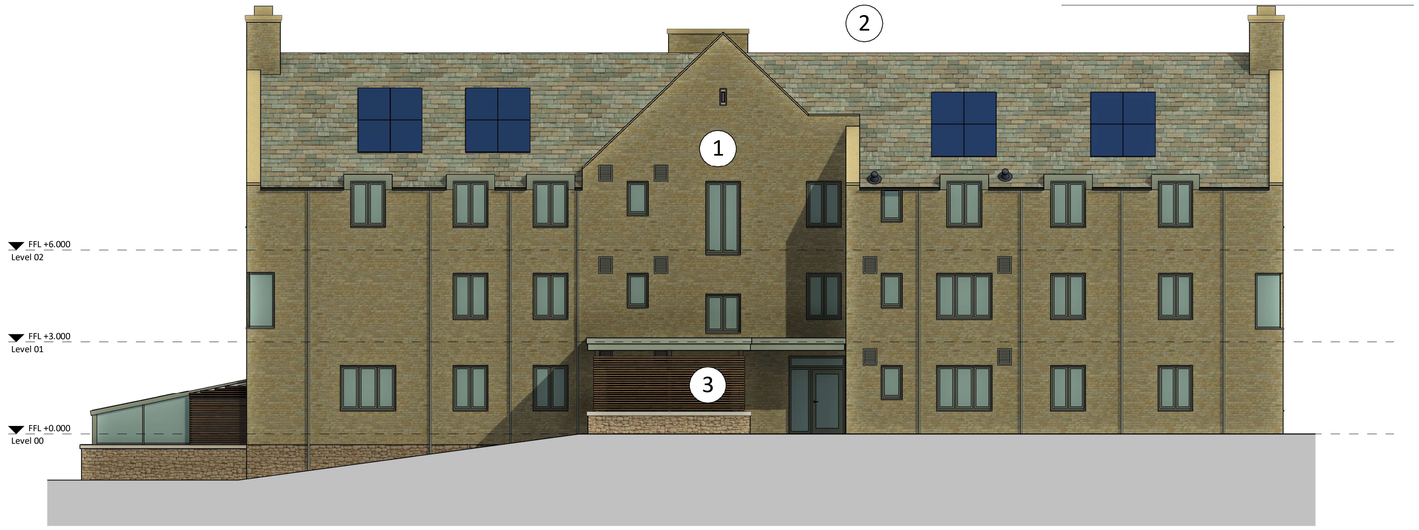
STATUS _ REVISION
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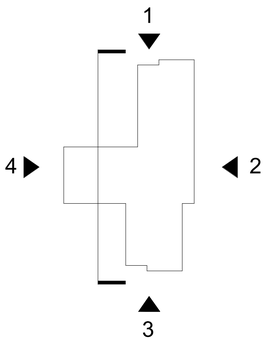


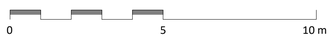
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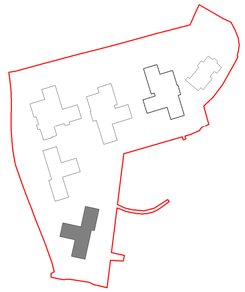


Section 1
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KEY PLAN







1. Cotswold style recon stone wall
2. Cotswold style artificial slates
3. Treated timber slats
4. Metal balconies
5. Powder coated composite window
6. Cotswold 'Dry stone wall'

STATUS	REV	DATE	DESCRIPTION
PL	P17	30/05/25	Post Planning Submission Comments FINAL Issue
PL	P16	15/05/25	Post Submission Changes
PL	P15	16/08/24	PLANNING ISSUE

CLIENT
Rangeford Villages

REVISED BY
SAH

CHECKED BY
DP

ORIGINATOR NO
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PROJECT
Siddington Park Phase 2

DRAWING TITLE
GA Elevations and Section - Block 6

STATUS CODE
PL : Authorized and accepted

SCALE
As indicated@A1

DRAWING USAGE: *PLANNING*

PROJECT - ORIGINATOR - VOLUME - LEVEL - TYPE - ROLE - CLASS. - NUMBER
155388-STL-C-ZZ-DR-A-ZZ-10552

STATUS _ REVISION
PL_P17

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Note

1. Do not scale from this drawing
2. To be read in conjunction with Project Risk Register
3. To be read in conjunction with all other Landscape Architect's drawings

KEY

Site

- Site Boundary
- (A) Vehicular Access — Connections points with wider retirement village
- (B) Car Parking Bays — Including blue badge parking
- (C) Pedestrian Crossing — Priority crossing points to encourage movement throughout site
- (D) Village Green — With a level lawn for activities and biodiverse planting
- (E) Communal dining area — Inlucing reflection garden with biodiverse planting and dining furniture
- (F) Kitchen Garden — including potting shed, greenhouse and outdoor edible planting
- (G) Terraces — To offer social spaces, seating and interactive growing beds
- (H) Proposed pedestrian access — From Tillias Grange and Willow Grange (Phase 1)
- (I) Communal Amenity Area
- (J) Emergency Vehicular access
- (K) Existing substations and equipment cabin retained
- (L) Maintenance Cabin
- (M) Owners Lounge External Patio

ID	RISK	MITIGATION	DATE MITIGATED

RESIDUAL PROJECT RISKS

DATE	REV	DESCRIPTION OF REVISION	DRAWN BY	APPROVED BY
29/05/2025	P04	Issued for Planning	ZW	MR
20/05/2025	P03	Issued for DRAFT Updated following coordination with architect	MDS	MR
14/08/2024	P02	Updated following coordination with architect; Issued for planning	TJ	MR

REVISIONS

STATUS
S2 - *For Planning*

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CLIENT :
Rangeford Villages

PROJECT TITLE :
Siddington Park Phase 2

DRAWING TITLE :
Landscape Illustrative Masterplan

DRAWING SCALE :	DRAWN BY :	DRAWN DATE :
NTS	MDS	10/05/2024
PAPER SIZE :	APPROVED BY :	ALA PROJECT CODE:
A1	MR	841

DRAWING NUMBER : **841-ALA-00-XX-D-L-1001**
STATUS : **S2**
REVISION : **P04**

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Block 1
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Block 2
FFL +107.8m

Block 3
FFL +106.2m

Block 4
FFL +105m

Block 5
FFL +104.5m

FFL
+105.7m

Block 2
Block 3
Cedar Grange

108.9m
108.9m
107.8m
107.624m
108.019m
107.404m
107.905m
107.795m
107.164m
107.219m
106.094m
106.595m
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105

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Refer to drawing - 841-ALA-00-XX-D-L-1009

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Block 6
FFL +105m

Block 3
Cedar Grange

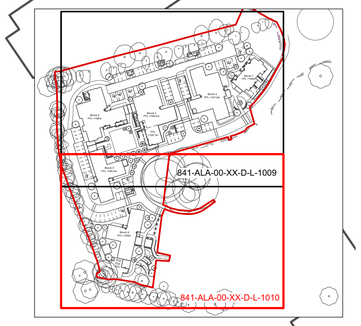
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Sycamore Grange

Block 11
Tilias Grange

Block 9
Pine Grange

Block 12
Willow Grange

Cypi



Location Plan

0 5 10 15 20 25 M

Note

1. Do not scale from this drawing
2. To be read in conjunction with Project Risk Register
3. To be read in conjunction with all other Landscape Architect's drawings

KEY

Site

	Planning Application Boundary
FFL +102.34m	Finished Floor Level
+ 102345mm	Proposed Level
+ 102345mm	Existing Level

ID	RISK	MITIGATION	DATE MITIGATED

RESIDUAL PROJECT RISKS

DATE	REV	DESCRIPTION OF REVISION	DRAWN BY	APPROVED BY
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CLIENT :
Rangeford Villages

PROJECT TITLE :
Siddington Park Phase 2

DRAWING TITLE :
Levels Plan 2 of 2

DRAWING SCALE :	DRAWN BY :	DRAWN DATE :
1:200	MDS	10/05/2024
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A1	MR	841

DRAWING NUMBER :	STATUS :	REVISION :
841-ALA-00-XX-D-L-1010	S2	P04

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WELCOME TO











0.1 Winter Solstice
Shadow Study

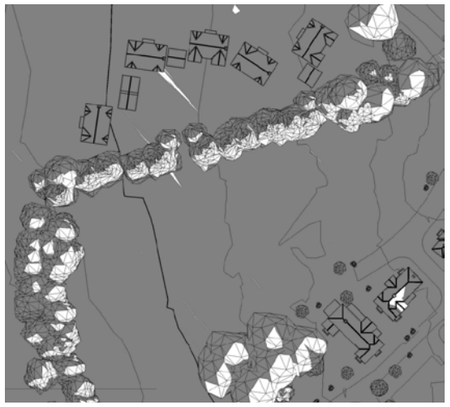
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Key dates used remain as follows:

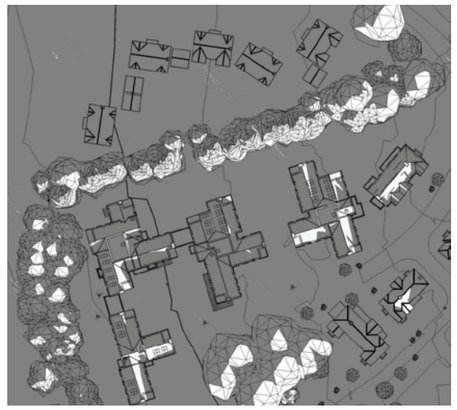
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Spring Equinox (March 21)

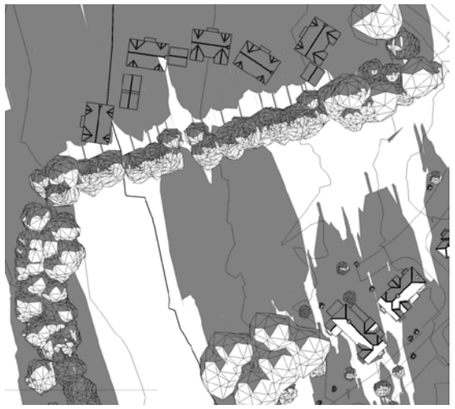
Summer Solstice (June 21).



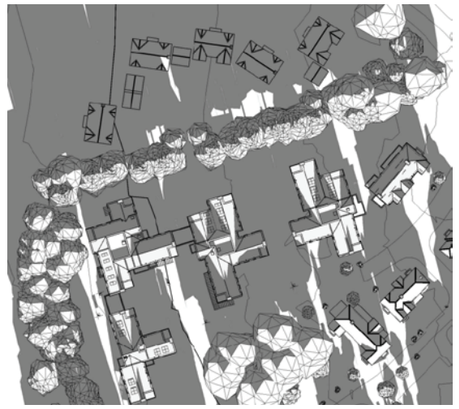
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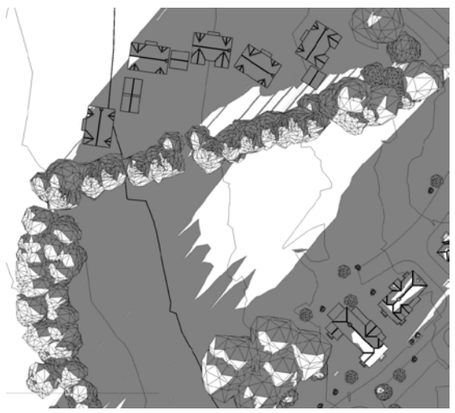
Proposed Winter Solstice 1000h



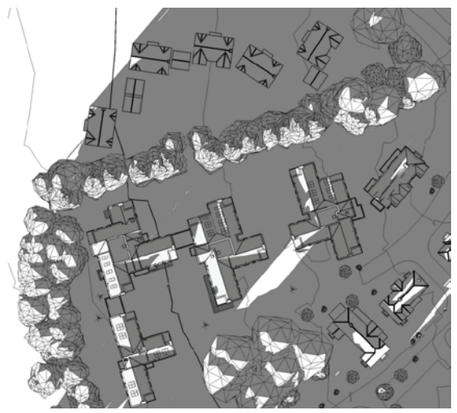
Existing Winter Solstice 1200h



Proposed Winter Solstice 1200h



Existing Winter Solstice 1600h



Proposed Winter Solstice 1600h

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0.2 Spring Equinox
Shadow Study

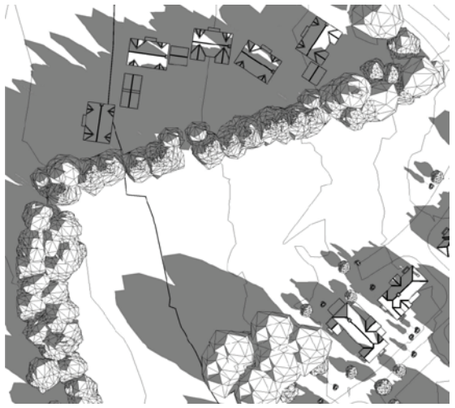
A subsequent shadow study has been carried out to understand the impact of the scheme changes on daylight and shadows during critical times of the year. This is highlight the limited effect of the development on properties to the North.

Key dates used remain as follows:

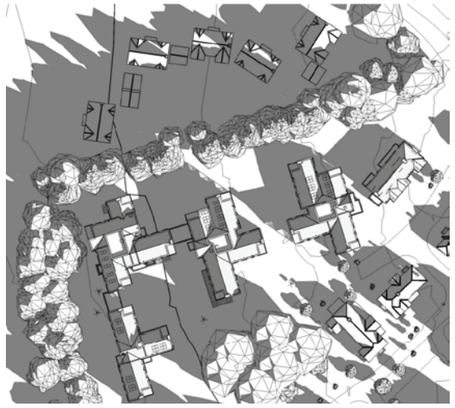
Winter Solstice (December 21)

Spring Equinox (March 21) - right

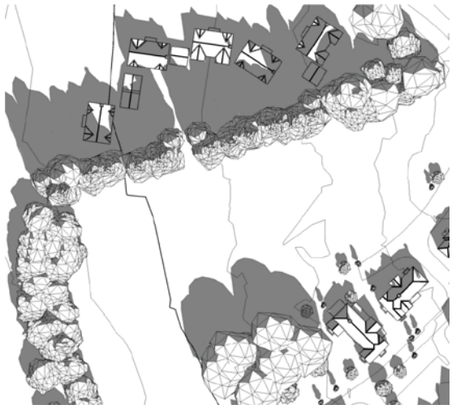
Summer Solstice (June 21).



Existing Spring Equinox 1000h



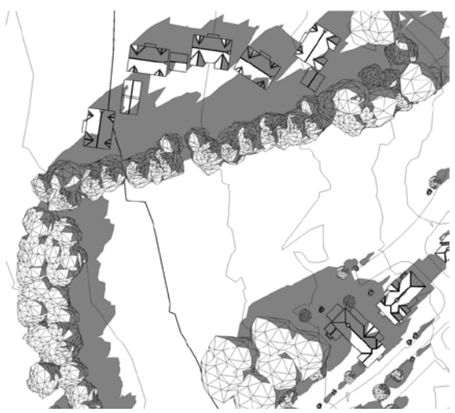
Proposed Spring Equinox 1000h



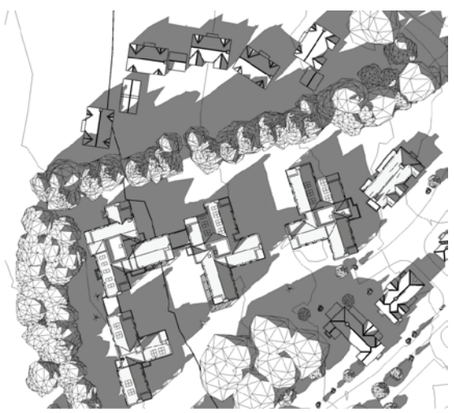
Existing Spring Equinox 1200h



Proposed Spring Equinox 1200h



Existing Spring Equinox 1600h



Proposed Spring Equinox 1600h

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0.3 Summer Solstice
Shadow Study - With Changes

A subsequent shadow study has been carried out to understand the impact of the scheme changes on daylight and shadows during critical times of the year. This is highlight the limited effect of the development on properties to the North.

Key dates used remain as follows:

Winter Solstice (December 21)

Spring Equinox (March 21)

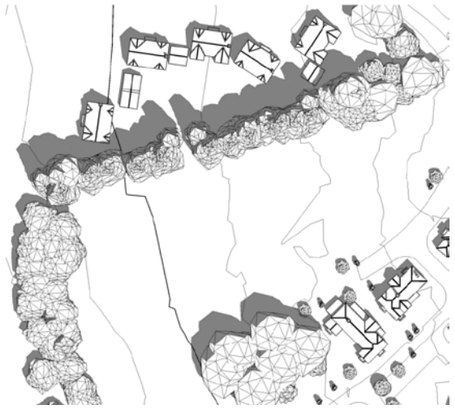
Summer Solstice (June 21) - right



Existing Summer Solstice 1000h



Proposed Summer Solstice 1000h



Existing Summer Solstice 1200h



Proposed Summer Solstice 1200h



Existing Summer Solstice 1600h



Proposed Summer Solstice 1600h

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Seniors Housing Planning Need Assessment
Siddington Park, Phase II

Prepared for Rangeford

July 2024

Your partners in property

Instruction

Purpose

Knight Frank has been instructed to prepare a needs assessment on behalf of Rangeford in relation to a planning application. The report is for a proposed seniors housing scheme at Siddington Park, Cirencester. The scheme consist of two phases totalling 180 units – the first phase of 123 units has already been delivered, the second phase of 57 units is the focus of this report.

Analysis of the population and demographics of the elderly population together with existing and future supply has been carried out in conjunction with Rangeford's proposed development.

Data Sources

We have utilised several resources on a desktop basis to establish the demand and supply landscape, and whether there is a need for the proposed development.

The following sources have been used to support this report:

- ONS Census 2021 Population statistics
- ONS 2018-based population projections
- ONS 2019 mid-year population estimates
- LaingBuisson Extra Care Housing UK Market Report
- Housing LIN
- Elderly Accommodation Counsel
- www.housingcare.co.uk
- Glenigan planning portal
- Relevant planning departments
- Cotswold District Council
- Cotswold District Local Plan 2011 – 2031 (Adopted September 2018)
- Review of the Cotswolds District Local Pan 2011 – 2031 – Housing Requirement (August 2023)
- Cirencester Town Council Planning Statement (November 2015)
- Cotswolds District Council Local Plan Response to Reg 18– Development Strategy and Site Allocation January 2015
- Gloucestershire – Local Housing Needs Assessment 2019 (September 2020)
- Cotswolds District Council – Housing Implementation Strategy (June 2017)

Timing

The planning research has been carried out between 03/07/2024 and 17/07/2024. Any planning applications submitted after 17/07/2024 have not been researched.

Instruction Summary	
Client	Rangeford
Site Address	Siddington Park, Cirencester, Gloucestershire, GL7 6GU
Purpose of advice	Planning Needs Assessment
Date of engagement	July 2024
Prepared by	Sam Heffron – Senior Research Analyst, Seniors Housing
Reviewed by	Lauren Harwood – Partner, Seniors Housing

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1. Executive summary

Executive summary

We have reviewed the demand and supply position of the proposed site and are able to comment on the general provision of seniors housing within the Cotswold local authority. Our analysis shows there is a significant shortfall in the number of seniors housing units within the Cotswold local authority. Furthermore, content from Cotswold District Local Plan 2011 – 2031 documents also recognises a need to increase the provision of seniors housing. Population projections provided by the ONS estimate there will be significant growth in the 65+ and 75+ population which will further strengthen the argument for increased provision of specialised housing for the elderly.

Our view of Cotswold local authority is provided using the following key categories:

SITE & LOCATION

The site benefits from easy road access from an A-road to surrounding towns and villages, allowing convenient access for residents and staff.

DEMOGRAPHICS

There are an estimated 97,047 individuals in Cotswold as of 2024. Of this, 27% of the population are aged 65+, and 14% aged 75+, which amounts to over 40,000 individuals aged 65+.

In the PCA, projections suggest there will be a 25% increase in the 65+ population and an 23% increase in the 75+ population between 2024-2034, a population that will require increased provision of seniors housing.

EXISTING SUPPLY

The majority of existing seniors housing stock is age-restricted or sheltered housing delivered post-2004.

There is a deficit of leasehold sheltered and extra care housing for sale, which the proposed scheme offers.

FUTURE SUPPLY

There are two Integrated Retirement Communities in the pipeline with planning. The schemes will deliver 119 units to Cotswold Local Authority.

DEMAND AND SUPPLY BALANCE

There is currently an estimated shortfall of 315 private seniors housing units in Cotswold, and 409 units in the PCA.

Population projections suggest this gap will widen over the coming years.

2. Market Context

2a. Seniors housing market

Housing for the elderly population has traditionally focused around either remaining in the family home, or moving into a residential care home. Seniors housing provides an alternative option.

Seniors housing provides purpose-built specialist property for seniors. This accommodation, also referred to as senior living or retirement living, encompasses a broad range of housing options and caters for seniors who require specialist housing but who want to remain independent and benefit from the availability of on-site services and care. The sector sits in a space between general housing and care homes. There are different models which deliver increasing levels of services, including care. In the market, a wide range of terminology is used but we outline the main terms below:

Within this report we will refer to the full market as **Seniors Housing**, which is split into two parts – **Retirement Housing** and **Integrated Retirement Communities** (IRC)**.** We will refer to the development and the analysis as IRC throughout the report, only using Extra Care terminology for the independent needs assessment.

Retirement housing - also known as retirement living, independent living, age restricted housing or sheltered housing:

Covers seniors who are typically selling or leaving their former family home and moving to flats or cottages designed for people in later life. The accommodation options are varied and are provided by both the government and affordable sectors, as well as private operators such as Rangeford. The apartments will typically have Use Class C3 planning unless they form part of a larger development linked with care. The extent of communal facilities varies by scheme and operator.

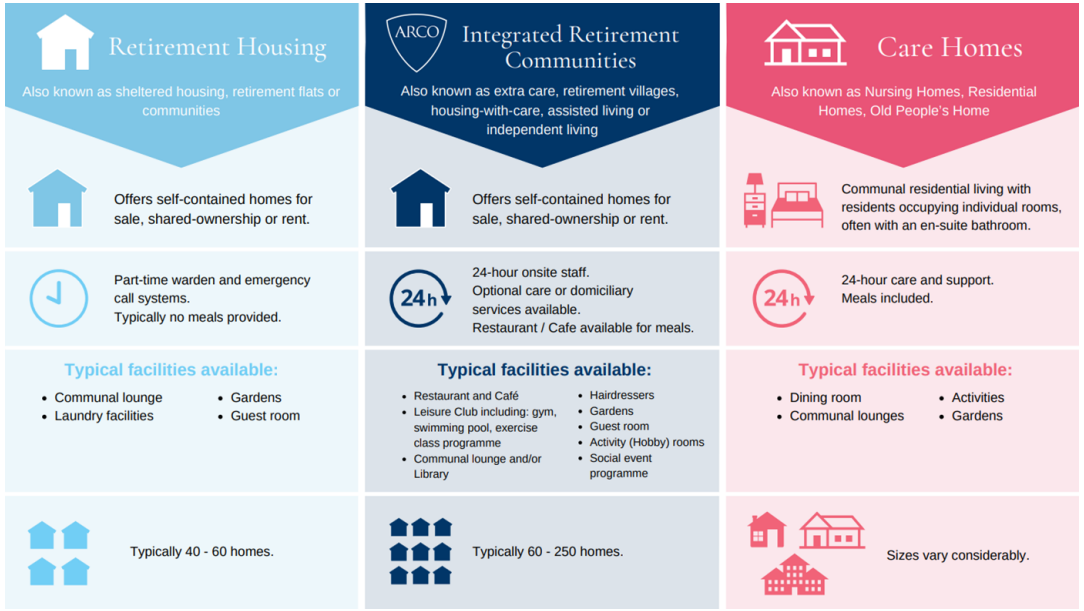
Integrated Retirement Communities (IRC) - also known as Extra Care, Assisted Living, and Housing with Care:

ARCO have adopted the term 'Integrated Retirement Communities' for this part of the sector. Represented by operators such as Rangeford and Audley Villages, IRCs can be defined as combining high quality housing options for older people with tailored support services. The term was adopted after years of research and engagement with older people who suggested a need for a universal term to increase clarity. They allow residents to rent or own a property and to maintain their privacy and independence, with the reassurance of 24-hour on-site staff, communal facilities, and optional care and support as needed.

Typically, occupiers live by themselves and do not require constant care. Residents can purchase domiciliary care on a flexible basis when required. There is an emphasis on residents having independent lifestyles; the cost of care depends on the amount of care required by the individual. Support is available 24/7 (but personal care is not necessarily provided through the night); domestic support is provided if required; communal / shared facilities are available to all. The accommodation allows individuals to "age in place". Levels of acuity may increase to the point where the resident has to move to a care home.

Close care: This is residential accommodation linked to a care or nursing home. Residents are able to use the facilities in the care home.

Figure 1: ARCO definition of Seniors Housing market



2b. Integrated Retirement Communities

We have been advised that the subject scheme is proposed as an Integrated Retirement Community Scheme (IRC). We have not been provided with full details of the offering at this early stage but understand the proposed scheme will cater to residents with varying levels of care need whilst providing an independent lifestyle.

Integrated Retirement Communities (also known as assisted living, housing with care or Extra Care) are a form of specialist housing providing self-contained residential apartments and cottages. Residents have access to on-site facilities and services, including domiciliary care.

The apartments are the residents' home and this type of property is distinct from residential care homes and nursing homes.

Whilst planning permissions are often restricted to 55 / 65 years+, we would normally expect residents moving into Housing with Care retirement communities to be 75 years +. However, there are a considerable number of those aged 65-74 living in IRC schemes throughout the country.

Domiciliary care is available 24/7 on site, with residents purchasing as much as they require on a flexible basis.

These developments provide communal facilities, although the exact provision varies. Facilities include, but are not limited to, a restaurant, private dining room, a gym, swimming pool, a resident's lounge, hair salon, library, activities room and guest accommodation for visitors.

Normally operators aim to support residents to "age in place" and thereby provide an alternative to a care home.

Residents with high levels of acuity or specialist health care requirements may have to move on to care homes.

Integrated Retirement Communities are often within planning Use Class C2 however some schemes are delivered under C3 consent.

The private sector has been increasingly active in the housing with care sector in recent years, with institutional money starting to invest.

Integrated Retirement Communities with communal facilities and services create operational real estate assets which require on-going management.

Revenue is generated through the initial sale of the units, but the model should also provide for the on-going management of the property. This includes property maintenance, the provision of hospitality and care services, lifecycle costs, head office costs, estate agency and other staffing.

Most of the private IRC industry is dominated by sales on a leasehold basis; although there is increasing interest in rental.

We expect leaseholds to be for a minimum of 125 years with residents paying a service charge and typically an event fee (also known as a Deferred Management Fee).

Active operators include Retirement Villages Group (RVG), Rangeford , Audley Villages, Richmond Villages, Inspired Villages, and River, among others.

Integrated Retirement Community offering:

- Care
- Hospitality and communal facilities
- Wellbeing and lifestyle
- Independence and choice

2c. Benefits of Seniors Housing

The provision and effective delivery of seniors housing into a community can bring a plethora of social, economic, health and environmental benefits.

Economy:

- The scheme will create a number of construction and operational jobs, both directly and indirectly. Short-term, there will be a need for construction workers to be on-site during the build, with Rangeford (2021) suggesting that for a 45 unit development a local authority could expect to see the benefits of 85 construction jobs for the duration of the build.
- A number of operational jobs will also be created by the proposed scheme. We understand that the flats will be supported by the care home. There will be a requirement for permanent full-time and part-time care and ancillary staff within the scheme. This includes, but is not necessarily limited to: healthcare workers, including nurses and carers; hospitality workers; chefs and waiters; maintenance and security workers; and leisure and wellbeing staff. Most of these staff will travel from within a 30 minute drive time of the site. The provision of these jobs will therefore provide wider benefits to the local economy, attracting economically active workers, and therefore increasing expenditure within the local area.
- In addition to staffing, schemes will generate additional council tax revenue and revenue will be generated through stamp duty payments.
- Schemes can also be good for local businesses. Rangeford (2021) found that, on average, residents of retirement communities spent 63% of their annual expenditure in local shops providing a further boost to the local economy.
- Gross Value Added (GVA) measures the contribution of economic activity to an economy, and can be used as an indicator of wealth. The proposed scheme will generate an additional GVA per annum for the local economy.
- Schemes can also be good for local businesses to support its daily operations. Examples include: gardening services, food supplies, bedding supplies, toiletry supplies, DIY and maintenance.

Housing:

- The introduction of seniors housing would allow the release of family housing back into the market. We assume that a large proportion of demand for this scheme would be localized, therefore this would mean an immediate positive impact for the local area and wider local authority. This release of stock will not only be beneficial for housing provision targets but could attract more economically active residents into the area and further increase household expenditure.
- A recent report from the Centre for Ageing Better (Locked Out A New Perspective on Older People's Housing Choices, Aug 2023) suggests that more than 4 million senior property owners could be willing to downsize, given the right opportunity Not only do schemes like this enable retirees' access to the benefits of retirement living but they also help to release large volumes of homes back into local residential markets for younger, prospective buyers High quality senior living schemes are therefore arguably catalysts for re distributing UK housing wealth.

2c. Benefits of Seniors Housing

Residents:

- For the residents themselves, peace of mind is the key benefit, with their health needs, safety, security and wellbeing needs addressed by the operator. Seniors housing can tackle loneliness and isolation, providing an independent lifestyle in high quality housing within a community setting.
- Residents' emotional needs can be supported and enhanced by an Housing with Care operator.
- Research by Holland et al (ExtraCare Charitable Trust; Integrated Homes, Care and Support: Measurable Outcomes for Healthy Ageing, 2019) found that anxiety levels fell amongst residents within the first eighteen months of occupation in an Housing with Care scheme.
- Holland et al also noted greater memory retention, up to 24% improvement, and delayed frailty progression amongst Housing with Care scheme residents in contrast to the wider elderly population.
- A study that took place at Whiteley Village, an Housing with Care facility in Surrey, analysed 100 years of data records to suggest that life expectancy for females residing in their Housing with Care facility was, on average, five years greater than their counterparts in the general population.
- The study attributed the growth in life expectancy to reduced levels of isolation and the benefits of the care provision available. This research exemplifies the ability for seniors housing schemes to not only enrich residents' retirement lifestyles, but also improve their longevity.

Figure 2: Potential Savings to NHS

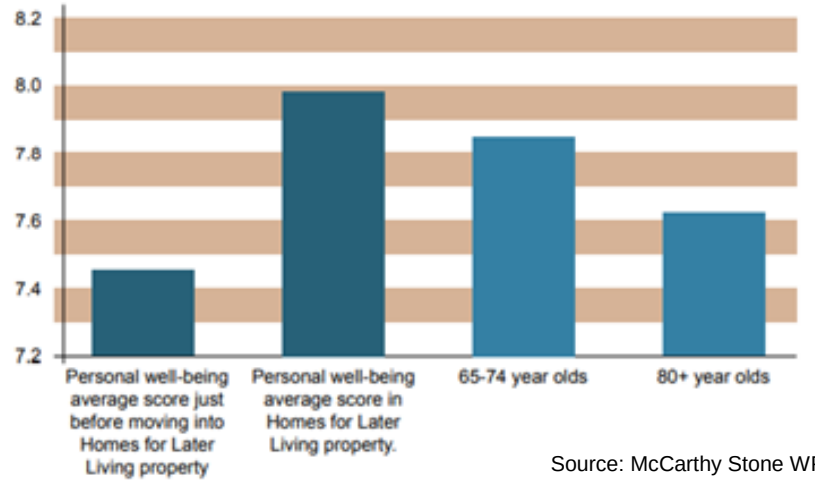


Source: McCarthy Stone WPI Reports

Environmental:

- Housing with care schemes also have the potential to benefit the environment.
- Younger families usually complete energy efficient renovations to family homes once in ownership of seniors.
- Housing with Care schemes often provide a car or shuttle service if they are not located in central areas. This has the benefit of reduced car usage and greater reliance on public transport. One Housing with Care development has the potential to take up to 15 cars off the road. Some schemes also include car clubs which encourages vehicle sharing.
- Some 97% of schemes are constructed on brownfield sites (Rangeford , 2020).
- New schemes equally tend to encompass eco-friendly fit outs, including smart appliances and high-quality insulation.

Figure 3: Average personal well-being scores for Homes for Later Living residents compared with national population



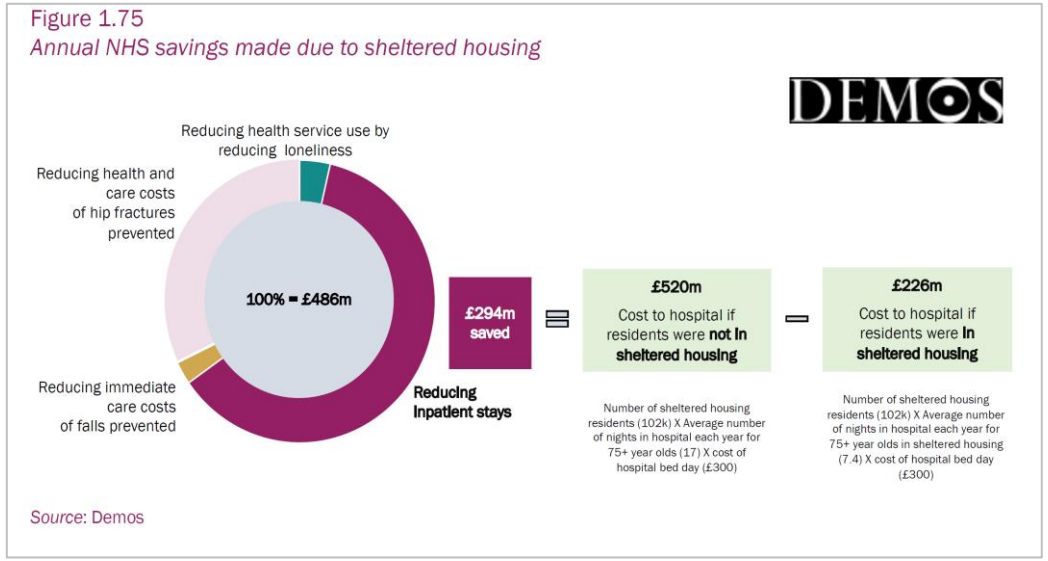
Source: McCarthy Stone WPI Reports

2c. Benefits of Seniors Housing

Healthcare and the NHS:

- The development will offer in-house care and services for an increasing elderly population. If delivered effectively, this will reduce pressure on social care and NHS services, leading to savings in the public sector. This could translate to a reduction in the number of community nurse visits, GP visits and will have a knock-on impact on ambulance call-outs and potentially the number of hospital admissions and reducing the length of stay.
- For example, despite housing with care residents typically having more complex health needs research from Rangeford suggests their residents have 0.66 fewer visits to GP surgeries per year in comparison to the general elderly population.
- Housing with Care schemes can also assist in reducing bed blocking at hospitals. When residents are admitted to a hospital their discharge procedure is faster when compared with elderly residents that may need to arrange domiciliary care within their homes.
- Research by Aston University further established that housing with care residents' unplanned hospital stays were limited to an average of 1-2 days in contrast to 8-14 day average stays for seniors in general private housing.
- An Housing with Care scheme can ensure that residents recover faster within their "everyday" environment where they can engage in activities specifically designed for them. The social aspect with dedicated carers and other residents can also assist with mental recovery, further reducing the overall burden on the NHS.
- Demos have produced research on the annual NHS savings made due to specialised seniors housing, which is shown in the graphic on the right. Housing LIN explain that the adapted facilities present in such schemes reduce the risk of falls and therefore hip fractures and other injuries that would require medical attention.
- As a result of the amalgamation of fewer GP visits, fewer community health nurse visits, fewer non-elective admissions to hospital and reduced durations of stay and less ambulance call-outs Housing LIN estimate a saving of £1,976.44 per resident per annum (2019)
- This, in itself, is a benefit arising from seniors housing schemes, particularly as the scale and efficiency of many new developments progresses.

Figure 4: Annual NHS savings made due to sheltered housing



Source: Demos

Figure 5: Reduction in care staff associated with Integrated Retirement Communities



Source: ARCO (2021)

2d. Market drivers

Demographics

The demographics underpinning the seniors housing market can be summed up concisely: the population is set to rise in the coming years, but the number of older people will increase much more rapidly as people live longer. The rapidly expanding cohort of individuals aged 75+ will trigger an increase in the proportion of the population requiring specialist seniors housing.

The UK's population is ageing. There are 11.2 million people aged 65+ at present which is set to increase by 21% in the next 10 years, at which point 1 in 4 people will be aged 65+. In the same 10-year period the number of people aged 80+ will increase by 33%.

By 2034 the number of people aged 75+ living in the UK is projected to increase by 19% to more than 6.7 million. By 2043, it is projected that 13% of the population will be aged 75+, an increase of almost 45% from today.

An older population requires increased levels of care and support data from the English Longitudinal Study of Ageing 2018-19 shows that 15.5% of individuals aged between 65-74 experience difficulty with one or more daily activities, while 44% for those aged 85 and above require some level of care and support for daily activities

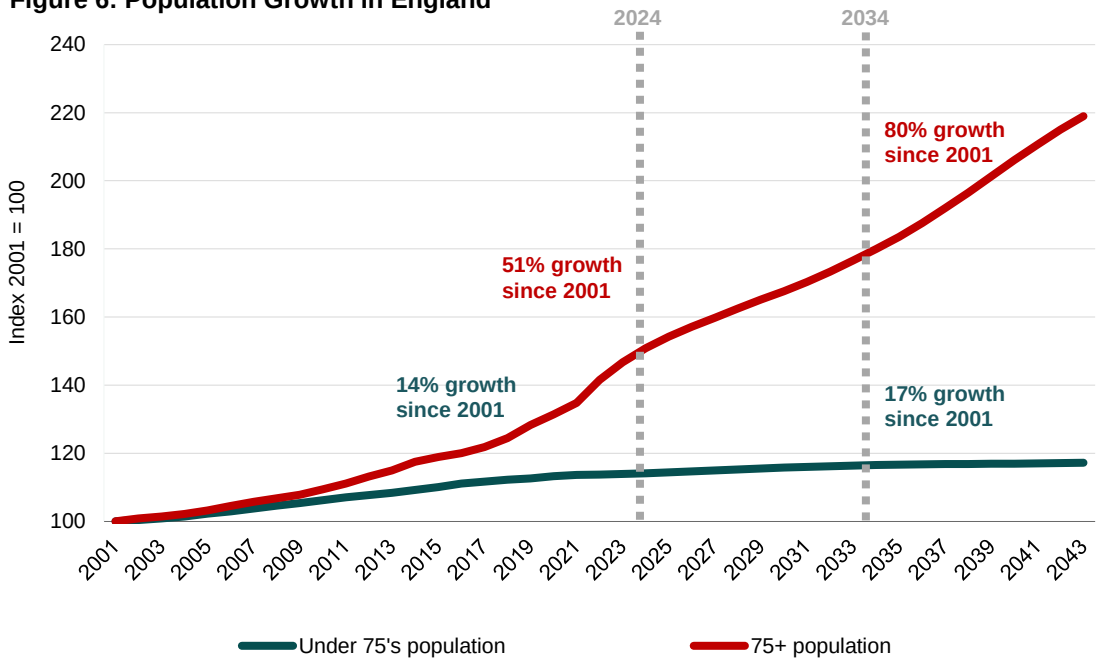
65+ and 75+ Population growth in England

The number of over 75s has increased 28% from 4.3m in 2014 to 5.6m in 2024. Over the same period, the 65+ population has increased 18% from 9.5m to 11.2m. The total 65+ population will rise to 13.6m by 2034 and 14.7m by 2043.

The total projected population in 2024 is 57,816,890 which is expected to increase by 4% to 59,988,992 in 2034 and a further 3% to 61,744,098 in 2043.

Between 2001 and 2024 there has been a recorded growth of 43% in the 65+ population, compared to 17% growth in the overall population. By 2043, the projected population of 65+ seniors will be 88% higher than in 2001 compared to 25% for the total population.

Figure 6: Population Growth in England



Source: Knight Frank, ONS

Source: Knight Frank Research, ONS

2d. Market drivers

Existing supply and undersupply

There is a substantial imbalance between the rate our population is ageing and the delivery of seniors housing.

As of 2024, there were just over 785,000 existing seniors housing units in the UK, with c.200,000 of these units either private for-sale or rental.

There are approximately 4,000 existing Seniors Housing private rental units in the UK, with 88% of these pepper-potted in for-sale schemes, and the remaining 12% delivered as purpose built rental schemes.

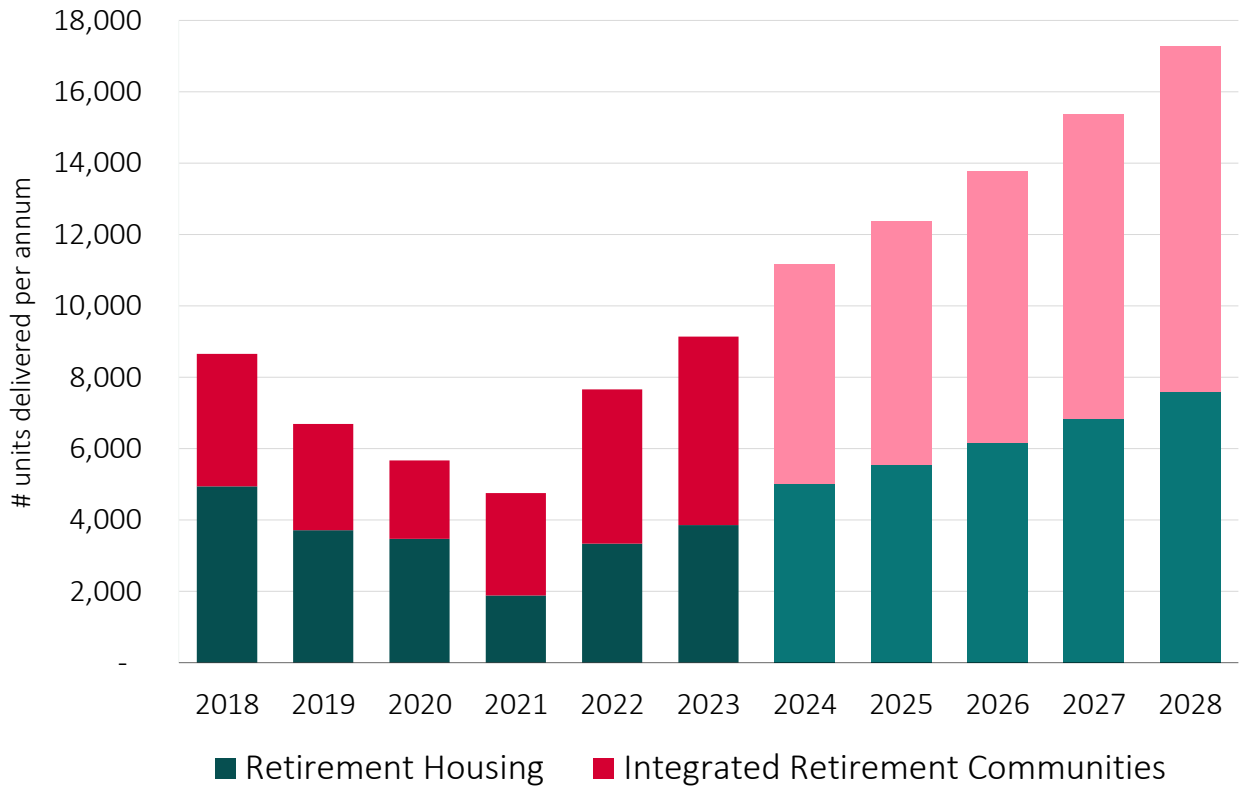
Given the growth of investment in seniors housing in recent years, an increase in delivery of seniors housing units is widely expected. We have analysed the future plans of all major operators against past delivery to forecast a 27% increase to the current stock of private seniors housing units by the end of 2025.

Our projection outlines the delivery of almost 42,000 private for-sale units and 7,500 private rental units between 2021-2025.

Of these units, we project the delivery of 21,000 private housing with care units for sale and almost 4,000 for rent.

Despite the predicted growth in the market, it is still evident that there is an undersupply of specialist housing for seniors in the UK.

Figure 7: Annual Delivery of Seniors Housing units in the UK



Source: Knight Frank Research, EAC, Planning portals

3. Proposed Scheme

3a. Proposed scheme

The proposed scheme is located on the southern outskirts of Cirencester town centre. We understand that proposed scheme is Phase 2 of the wider high-end Integrated Retirement Community (IRC), Siddington Park operated by Rangeford Villages.

We understand that Phase 1 of this IRC has achieved practical completion and due to launch on 2nd July 2024. Phase 1 covers a site of circa 8.4 acres and provides 123 one-,two- and three- bed apartments across 13 blocks and a central pavilion. We understand that the communal areas are situated in the central pavilion and include a coffee lounge, owner's lounge/cinema, bar, bistro, private dining, outdoor terrace, treatment room, gym, hydro pool, swimming pool, sauna, steam room, yoga/dance study and an activities room.

We have been advised that the proposed scheme is the development of Phase 2 and will cover a site of circa 3.2 acres. We understand that currently the site is being used for site compound and associated car parking. However, we have been advised that the plans for Phase 2 are to include 57 additional units comprising one-, two- and three- bed apartments and two-bed bungalows across 6 new build accommodation blocks. We understand that the units developed within Phase 2 will have access to the Phase 1 central pavilion and the amenities situated there.

Figure 8: Location of Proposed Scheme

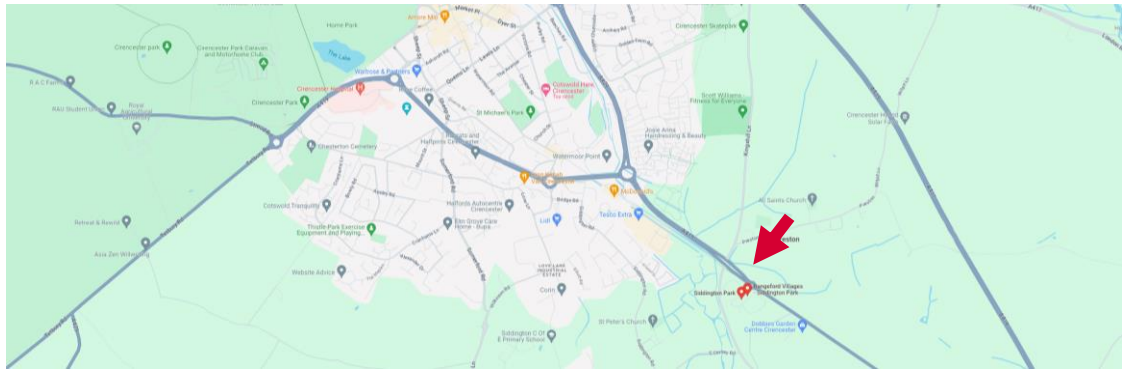


Figure 9: Existing Site Plan



Source: Knight Frank

3b. Proposed site and situation

The proposed site is located on the southern outskirts of Cirencester, on the A419, the connecting road between Cirencester and Swindon.

The town centre of Cirencester is circa 1.5 miles north of the proposed site. The town provides a plethora of amenities including shops, restaurants, cafes, doctors' surgery, places of worship and a library. We also understand that there are other amenities within 0.5 miles of the site which include a supermarket, petrol station, garden centre and fast-food outlets.

The nearest railway station is Kemble which is circa 6 miles southeast from the Subject Site with services on the Cheltenham-Swindon-London train line. The nearest bust station is located 0.5 miles southeast of the Subject Site, however there is also a bus station 0.9 miles from the Subject Site which provides greater routes around Gloucestershire.

The distance from key amenities including public transport and GP surgeries is in line with several operational seniors housing schemes.

The site's location on the outskirts of the town of Cirencester provides residents with an abundance of easily accessible green spaces.

Planning Constraints

We have looked at various planning and environmental constraints that may cause issues when seeking to undertake development at this location.

Flooding: The site is located within flood zone 1. This indicates there is a very small chance of flooding, less than 1 in a 100.

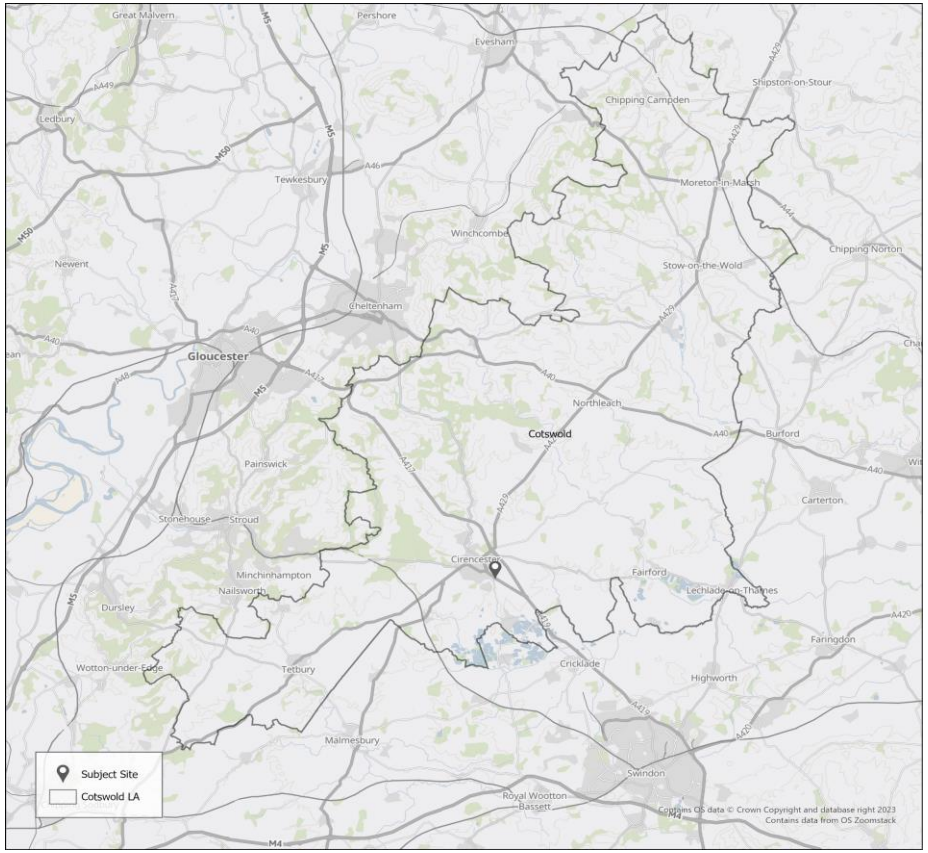
Conservation Areas: The property is not located within a conservation area.

Listed Buildings: There are no listed buildings in the vicinity of the site.

Green Belt: The property is not situated within a green belt.

For this exercise, we have identified the primary catchment area (PCA) as the Cotswold District Council (referred to in this report as Cotswold in the interest of brevity). This is used on the basis that moving into specialist seniors housing is a locally focussed market, with new residents being typically drawn from the local area or because the individuals has a connection with the area; for example, seniors moving to be closer to family members. As a benchmark, we typically assume 50% of the residents will be drawn from Cirencester and other nearby towns, although in practice the proportion will vary across different schemes.

Figure 10: Area of Assessment Cotswold Local Authority



3b. Local plans and literature review

We have undertaken a review of relevant housing documents and local plans to understand strategy around the need and provision of seniors housing. The current planning policies are based on the Cotswold District Local Plan 2011 adopted 3rd August 2018, which guides the district's development. The following documents have been reviewed:

- Cotswolds District Local Plan 2011 – 2031 (Adopted 3rd August 2018)
- Review of the Cotswolds District Local Pan 2011 – 2031 – Housing Requirement (August 2023)
- Cirencester Town Council Planning Statement (November 2015)
- Cotswolds District Council Local Plan Response to Reg 18– Development Strategy and Site Allocation January 2015
- Gloucestershire – Local Housing Needs Assessment 2019 (September 2020)

Cotswolds District Local Plan 2011 – 2031 (Adopted 3rd August 2018)

The aim of the Cotswold District Local Plan is to set out policies and proposals to meet the challenges facing the area over the period of 2011 to 2031. In regard to Cirencester, the local plan sets out that Cirencester will continue to be the focus for additional housing due to being identified as the most sustainable location to deliver future growth.

It is noted within the local plan that there is a relatively large and growing elderly population which places demand on health and public services, therefore more adaptable accommodation is likely to be required. The SHMA Update (April 2016) shows that there is a requirement for 665 sheltered and extra care housing units between 2017 and 2031 and a requirement for 580 nursing and residential bed spaces between 2017 and 2031.

Policy H4 (Specialist Accommodation for Older People) ensures that development of this accommodation type should ensure that they are designed to meet the requirement of the residents, be in easy access to public transport and amenities and provide a level of affordable housing.

Review of the Cotswolds District Local Plan 2011 – 2031 - Housing Requirement (August 2023)

A review of the housing requirement has been undertaken and highlighted that Policy H1 of the Local Plan includes increasing the requirement for bungalows as it will enable older people to downsize and free up larger accommodation for family housing.

It also highlighted that the Local Plan policy H4 identifies a need for 580 nursing and residential bed spaces between 2017 and 2031, however this was based on the calculation of the Strategic Housing for Older People Analysis tool in 2017 and does not provide the full C2 housing need of Local Plan period. Therefore, the overall need for dwellings will increase over the 20-year plan period.

Cotswolds District Council – Housing Implementation Strategy (June 2017)

The Council's Strategic Housing Market Assessment (SHMA) highlights a need for affordable housing and specialist accommodation for older people within the district. Through addressing the District's full objectively assessed housing need, one of the Council's Strategic Objectives is to 'provide an adequate supply of quality housing, of appropriate types and tenures'. Policies H1 to H5 of the Local Plan highlights the range of housing that will be delivered, including a suitable mix of housing types and tenures to meet local needs and providing a range of affordable housing and specialist accommodation for older people.

Cotswolds District Council Local Plan Response to Reg 18– Development Strategy and Site Allocation January 2015

The Reg. 18 document and supporting evidence highlights the aging profile of Cirencester's population and how this demographic trend must be actively planned for. It highlights the need for the following:

- New housing should be provided for the aging and elderly that is designed for their changing needs with features such as wider doorways, warmth, light, ground floor accommodation, near to bus routes.

3b. Local plans and literature review

- Special care facilities will be required to manage dementia, end-of-life care, access to healthcare.
- Development principles should specifically address the needs of the elderly such as provision of bus stops, community transport (including drop of places in town and at other destinations) and overcoming loneliness by providing community activities for the elderly.

Cirencester Town Council Planning Statement (November 2015)

This planning statement provides an evidence base and reference point for the future vision for Cirencester, working collaboratively with Cotswold District Council to ensure that issues facing the town and community are identified and appropriately reflected in planning policy through the Local Plan.

The planning statement draws on Cirencester's aging population, noting that many homes are not suitable for in-home care to be delivered effectively. It highlights that housing development needs to provide sufficient flexible accommodation for elderly, young disabled and those with families.

The report states that new residential developments should take the changing needs of the population into account in terms of:

- *Flexible residential properties that can be easily modified to accommodate the changing needs of residents*
- *Purpose-built residential units for older people should be located near to shops, services and healthcare*
- *Access to public transport such as buses, and semi-public modes of transport including taxis and mini-buses, should be designed into the street pattern of new development or modifications to existing roadways, to create drop-off and pick-up points that are convenient for people with mobility and sight impairment.*
- *Facilitating the well-being of older people by providing opportunities to be physically and socially active at a pace that is comfortable to them.*

Gloucestershire – Local Housing Needs Assessment 2019 (September 2020)

This document shows that overall, for Gloucestershire, the growth in the older population represents over 90% of the overall population growth; 63,368 persons from a total growth of 69,372 persons are projected to be aged 65 or over, including an increase of 20,218 persons aged 85 or over. This is particularly important when establishing the types of housing required and the need for housing specifically for older people.

Figure 25: Total projected households in Gloucestershire for 2021 and 2041 and summary of 20-year change by age of household representative (Note: Figures may not sum due to rounding)

	Age of Household Representative								TOTAL
	15-24	25-34	35-44	45-54	55-64	65-74	75-84	85+	
TOTAL HOUSEHOLDS									
2021	6,300	29,300	41,300	53,200	53,700	43,700	35,000	14,300	276,900
2041	9,600	35,300	43,200	54,000	52,400	54,200	57,600	30,400	336,700
TOTAL CHANGE 2021-2041	**+3,300**	**+6,000**	**+1,900**	**+900**	**-1,400**	**+10,500**	**+22,600**	**+16,100**	**+59,800**

The report summarises that single person households represent a quarter of the overall household growth in Gloucestershire with an increase of 15,200 households over the 20-year period (2021 to 2041), including 13,850 extra single person households aged 75 and over and 5,150 aged 85 and over.

The table below identifies the potential requirement for new specialist housing, taking account of current population and existing stock together with the additional demand for the period 2021 to 2041 based on the projected change in population aged 75+:

Figure 73: Modelled Demand for Older Person Housing in Gloucestershire based on Housing LIN Toolkit and GCC Modelling

		Rate per 1,000 persons aged 75+	Gross need 2021	Existing supply	Backlog at start of period	Gross need 2041	New need 2021-41	Overall need
Sheltered Housing	Owned	120	8,176	2,811	5,365	14,444	6,268	11,633
	Rented	60	4,088	4,332	-244	7,222	3,134	2,890
Extra Care	Owned	10	677	533	144	1,199	521	666
	Rented	5	339	374	-35	600	261	225
TOTAL		**195**	**13,280**	**8,050**	**5,230**	**23,465**	**10,184**	**15,414**

3b. Local plans and literature review

The GCC modelling shows no extra care backlog at the start of the period and no requirement for additional extra care in some LPAs due to the number of voids identified. At the same time, the number of voids were not large enough to show a surplus in 2021. However, an increase in the number of adaptable and accessible dwellings could help to reduce the requirement for sheltered housing.

The report summarises the following:

"Based on the current need and growth in population aged 75+ identified, the LHNA identified the potential requirement for new specialist housing for the period 2021-2041 using prevalence rates for sheltered housing from the Housing LIN SHOP resource pack and rates for extra care from Gloucestershire County Council. This analysis identifies a sheltered housing need of just over 14,500 dwellings (11,633 owned; 2,890 rented) in addition to a need for almost 900 dwellings provided as extra care (666 owned; 225 rented). Most of these properties will already be counted as part of the overall housing need; however, some extra care provision may offset some of the identified need for residential care counted in the allowance for C2 bedspaces"

"it was evident that three quarters of older person household own their homes and whilst many of these household will choose not to move, around a quarter of older households nationally would move to another home if there was suitable housing available that met their aspirations in the right place. Many of these households would have considerable equity available from the sale of their larger homes, therefore affordability is far less of a consideration for this group"

"Most household are seeking two bedrooms, although there is a reasonable demand for three-bedroom homes – typically from households currently living in properties with four bedrooms or more. There is a clear preference from bungalows"

"In conclusion, population projections show a large increase in older people between 2021 and 2041, an increase of 52, 232 persons aged 75+ and a corresponding need for dedicated housing options. However, it must be recognised that the identified need is based upon increasing the level of older people housing provision to idealised levels. In practice, this level of delivery is likely to be unachievable, but it is important to recognised that the provision of dedicated older person housing in the community which older people find desirable and suitable to live in as they age will release a considerable number of larger properties which will then be available for families.

Conclusions

The review of the local plans, planning statement and housing needs assessments projected a significant increase in the number of seniors within Cirencester and the wider county, particularly in the 75+ and 85+ age bracket. Therefore, there is a need for an increased number of integrated retirement communities to meet the needs of growing elderly population.

It is evident that the senior population within Cirencester and the surrounding area are predominantly owner occupiers of larger houses. This shows that this demographic are less impacted by affordability and therefore there is a demand for a high specification downsizing product.

It was noted within the Cirencester Town Planning Statement that there should be consideration within development for flexible accommodation for changing needs, access to public transport and facilitating the well-being of older people. Therefore, further supporting the need for Integrated Retirement Communities.

4. Needs assessment

4a. Area of Assessment

Catchment area

For this exercise, we have assessed need and provision for the local authority and a bespoke primary catchment area (PCA).

Cotswold is the local authority used within this report and the planning authority for this application. This has been the primary focus of the needs assessment.

We have also identified a primary catchment area (PCA) of 20 minutes' drive time around the site. This is used on the basis that moving into specialist seniors housing is a locally focused market, with new residents being typically drawn from the local area or because the individuals has a connection with the area; for example, seniors moving to be closer to family members.

As a benchmark, analysis from our Seniors housing Annual Review 2023/24 research highlights that approximately 50% of residents will be drawn from the PCA, although in practice the proportion will vary across schemes.

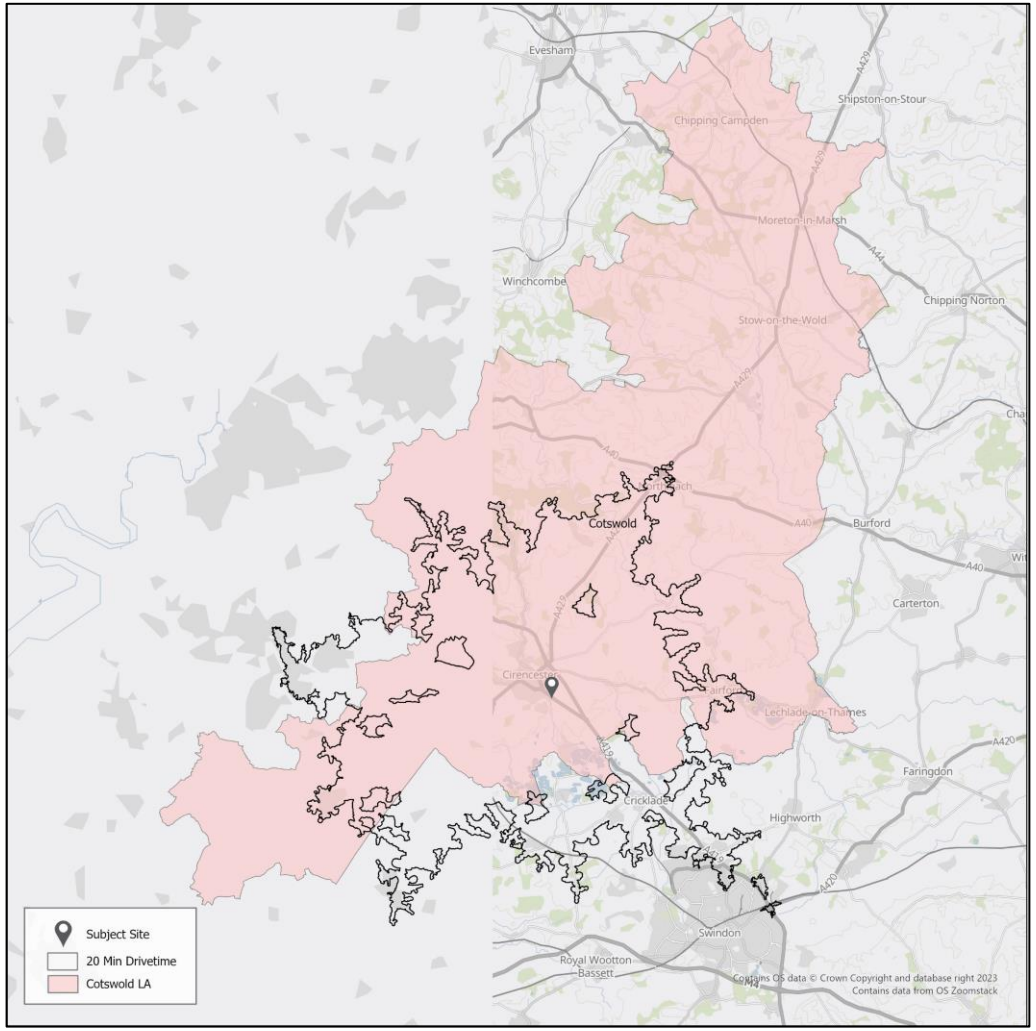
We also see residents being drawn to IRCs in aspirational locations, which we would consider the Cotswolds to be.

We have therefore based our assessment of need on both a local authority and catchment area as outlined on the map opposite.

We have also undertaken more detailed analysis on population trends in the local authorities surrounding Cotswold, and these are outlined below:

- Stratford-on-Avon
- West Oxfordshire
- Vale of White Horse
- Swindon
- Wiltshire
- South Gloucestershire
- Stroud
- Tewkesbury
- Cheltenham

Figure 11: Area of assessment – Cotswold Local Authority and PCA



Note: For PCA population projections, we have taken an average of growth figures from Cotswold and the five neighbouring local authorities highlighted above and then applied this to the PCA population.

4b. Assessing Need

The process for assessing demand and need for seniors housing is not clear-cut. Unlike the Care Home market which relies on LaingBuisson's usage rates for care in a residential setting model, there is not a single, industry-standard model for defining demand for seniors housing.

Housing LIN have produced the Strategic Housing for Older People Resource Pack (SHOP) in 2013 which suggests two approaches for assessing this need.

A) Modelling through Care Home Demand

Although perhaps now a little dated, a paper published in 2004 estimated that about a third of the population entering a care home could have moved to a form of seniors housing as a viable alternative, with a further third who could have managed in such housing had they moved at some time earlier in their care history. Thus, if you were only considering how demand for care home provision could be reduced through the delivery of seniors housing, this evidence would suggest that at least one third of residents could have been diverted to more appropriate housing with care, and possibly up to two thirds if appropriate information and advice had been available. Consideration is then given to the impact other interventions in the community could have on this demand, such as the provision of telecare, aids, adaptations, and better information.

B) Modelling from Population data

There are a number of different models for estimating demand for supported housing. "Housing markets and independence in old age" offers one model. A more detailed approach is available in 'The Older Persons' Housing Toolkit' although assumptions on which it defines its prevalence rates are not included in the paper.

The SHOP Toolkit provides an indication of provision levels for different types of seniors housing. This ranges from conventional sheltered (affordable) housing through to private sheltered and extra care/housing with care provision.

Table 1: Housing LIN Strategic Housing for Older People Resource Pack (SHOP)

Forms of Provision	Estimate of demand per thousand of the relevant 75+ population
Conventional sheltered housing to rent	60
Leasehold sheltered housing	120
Enhanced sheltered housing	20 (50% allocated to private for sale)
Extra care housing for rent	15
Extra care (IRC) housing for sale	30
Housing based provision for dementia	6

This approach indicates that 30 extra care (IRC) for sale units (which are comparable to the units in the proposed scheme) are required per 1,000 people aged 75+ to meet the need. An additional 20 units are required per 1,000 people aged 75+ for enhanced sheltered housing, where 50% should be private for sale. This has also been included in our calculations.

A ratio of 40 units per 1,000 people i.e. a 4% penetration/prevalence rate has therefore been adopted to assess need for the proposed scheme. Note this will also be described as private IRC units within our Supply section.

It is acknowledged that whilst this is widely used within the industry, the toolkit is a relative assessment of demand and therefore subject to geographic variations and the influence of new developments. Despite these limitations, we believe that this is a robust method of assessing the gap between potential demand and supply within a particular area.

It should be noted that while the SHOP toolkit only assesses demand for the 75+ population, we will include analysis for both the 65+ and 75+ population. This is on the basis that those under the age of 75+ do move into specialist seniors housing and will also form the basis of future demand. Housing LIN have announced that they are developing an updated model to assess senior housing demand. The release date for the model remains to be confirmed.

4c. Population statistics

Table 2: 2024 Population estimates

Age	PCA		Cotswold		South West		England	
	#	%	#	%	#	%	#	%
0-4	6,758	5%	4,309	4%	487,520	5%	3,122,493	5%
5-9	7,884	6%	5,065	5%	549,424	6%	3,399,368	6%
10-14	8,865	6%	5,396	6%	604,179	6%	3,616,583	6%
15-19	7,771	6%	4,960	5%	573,059	6%	3,455,540	6%
20-24	5,727	4%	4,057	4%	498,584	5%	3,296,014	6%
25-29	6,231	5%	3,789	4%	524,228	6%	3,642,635	6%
30-34	6,659	5%	4,397	5%	558,394	6%	3,873,735	7%
35-39	8,153	6%	5,274	5%	584,595	6%	3,831,710	7%
40-44	8,880	6%	5,756	6%	612,642	7%	3,743,562	6%
45-49	8,504	6%	5,555	6%	585,825	6%	3,422,391	6%
50-54	10,129	7%	6,823	7%	628,461	7%	3,710,937	6%
55-59	10,607	8%	7,632	8%	649,927	7%	3,865,450	7%
60-64	9,875	7%	7,541	8%	600,319	6%	3,594,639	6%
65-69	8,548	6%	6,625	7%	500,550	5%	3,002,525	5%
70-74	7,436	5%	6,185	6%	440,828	5%	2,624,872	5%
75-79	7,020	5%	6,031	6%	437,783	5%	2,483,435	4%
80-84	4,579	3%	4,027	4%	281,399	3%	1,586,029	3%
85-89	2,750	2%	2,310	2%	178,487	2%	984,050	2%
90+	1,536	1%	1,317	1%	109,057	1%	560,922	1%
All Ages	**137,912**	**100%**	**97,047**	**100%**	**9,405,259**	**100%**	**57,816,890**	**100%**
65+ Total	**31,869**	**23%**	**26,493**	**27%**	**1,948,104**	**21%**	**11,241,833**	**19%**
75+ Total	**15,885**	**12%**	**13,684**	**14%**	**1,006,726**	**11%**	**5,614,436**	**10%**

Table 3: 2024 Population estimates indexed against England (England = 100)

Age	PCA	Cotswold	South West
65-69	119	131	102
70-74	119	140	103
75-79	119	145	108
80-84	121	151	109
85+	117	140	111
90+	115	140	120
65+ Total	119	140	107
75+ Total	119	145	110

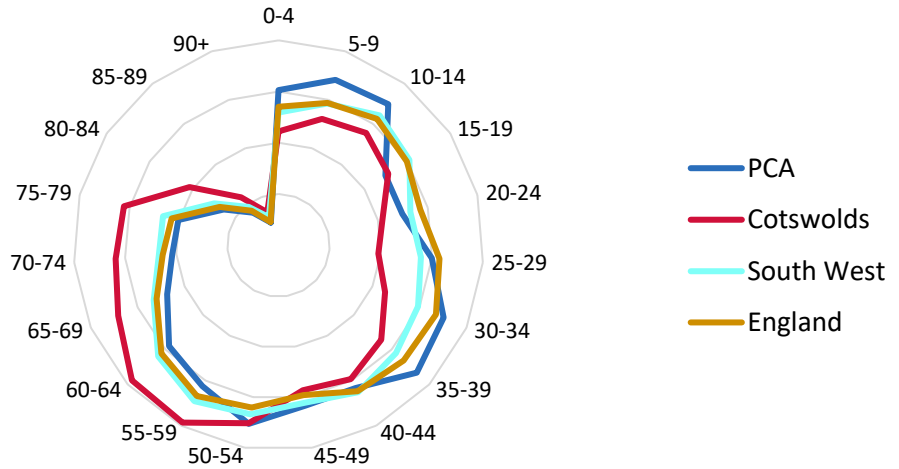
We have assessed population trends for the PCA, Cotswold and benchmarked against the following geographic areas:
- South West of England region
- England

We have assessed potential demand based on the latest Census data and 2021-based population estimates.

For the purposes of this section, we analyse the population aged 65+ to determine current and future need. However, in our model we have focused on seniors aged 75+ as this is where need and age converge, and thus forms the most suitable basis for assessment.

There were an estimated 97,047 individuals in Cotswold as of 2024. Of this, 27% of the population are aged 65+, and 14% were aged 75+, amounting to just under 13,700 individuals. These proportions are slightly above the average for both the South West and England.

Figure 12: Breakdown of 2024 population estimates by 5-year age bands



Source for data on this slide: Knight Frank Research, ONS, 2020 mid-year population estimates, 2018-based population projections
Note that we have included the latest data from the 2021 Census where available – this is for local authority, regional and national data only.

4d. Population change

The 65+ and 75+ age cohorts have increased at a considerably faster rate than the under-65 age groups in both the PCA and Cotswold. The primary target market is 75+ though additional demand may also come from the 65-74 cohort. There has been a 44% increase in the total number of individuals aged 75+ residing in Cotswold since 2014, while over the same period it is estimated that the number of individuals aged under 65 has increased by 29%. Similar trends can be seen in the PCA.

Figure 13: PCA population change – 2002-2038

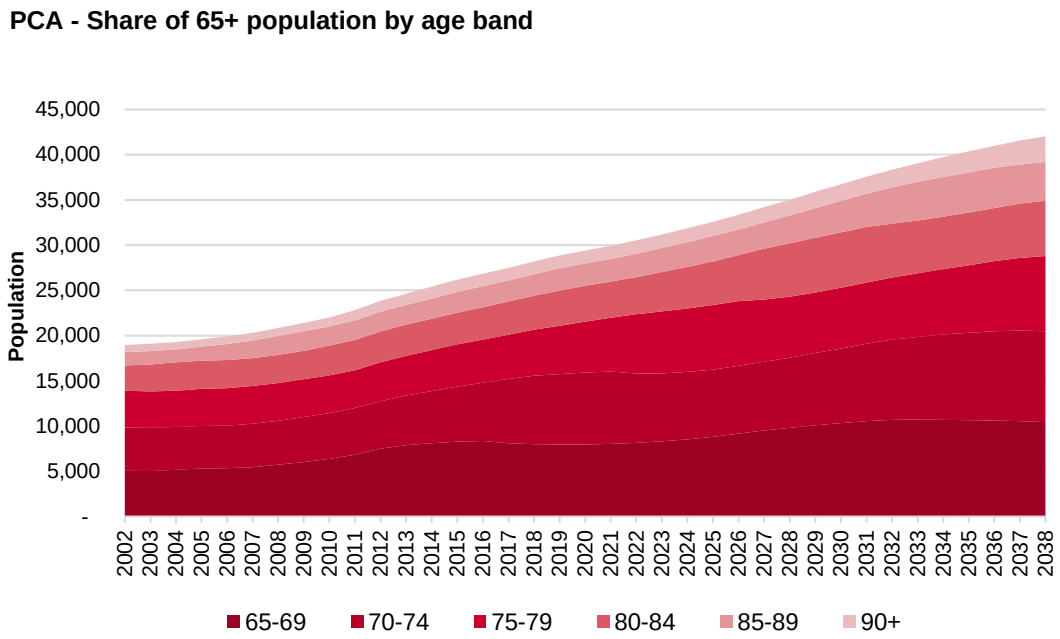


Table 4: PCA and Cotswold population change – 2014-2024

	PCA			Cotswold		
	2014	2024	% Change	2014	2024	% Change
Under-65's	100,232	106,042	6%	64,150	70,554	10%
65-69	8,107	8,548	5%	6,208	6,625	7%
70-74	5,750	7,436	29%	4,809	6,185	29%
75-79	4,531	7,020	55%	3,666	6,031	64%
80-84	3,488	4,579	31%	2,906	4,027	39%
85-89	2,212	2,750	24%	1,823	2,310	27%
90+	1,298	1,536	18%	1,094	1,317	20%
65+	**25,386**	**31,869**	**26%**	**20,506**	**26,493**	**29%**
75+	**11,529**	**15,885**	**38%**	**9,489**	**13,684**	**44%**
Total population	**125,618**	**137,912**	**10%**	**84,656**	**97,047**	**15%**

Source: Knight Frank Research, ONS, 2020 mid-year population estimates

Between 2014 and 2024, the 65+ population in Cotswold grew by 5,987 and the 75+ population grew by 4,195. The largest growth in percentage terms was in the 75-79 and 80-84 age cohorts, which respectively grew by 64% and 39% over the 10-year period. The older age cohorts are most likely to require and benefit from specialist seniors housing.

Source: Knight Frank Research, ONS, 2020 mid-year population estimates
Note that we have included the latest data from the 2021 Census where available – this is for local authority, regional and national data only.

4e. Population forecasts

Population projections from the ONS suggest that between 2024 and 2034, the population of Cotswold will increase by 10%.

However, the area will undergo substantial growth within the older age groups with the 65+ and 75+ age cohorts both set to increase by 28%. By comparison, the population of under-65's will see an increase of 3%.

The population of individuals aged 65+ will increase to a projected total of c.7,457 individuals by 2034. In percentage terms, the largest growth will come from the 85-89 age cohort which is expected to grow by 67% during the period, followed by the 90+ and 80-84 age cohorts, which are expected to grow by 46% and 31%, respectively.

Figure 14: PCA Projected population change 2024-2034

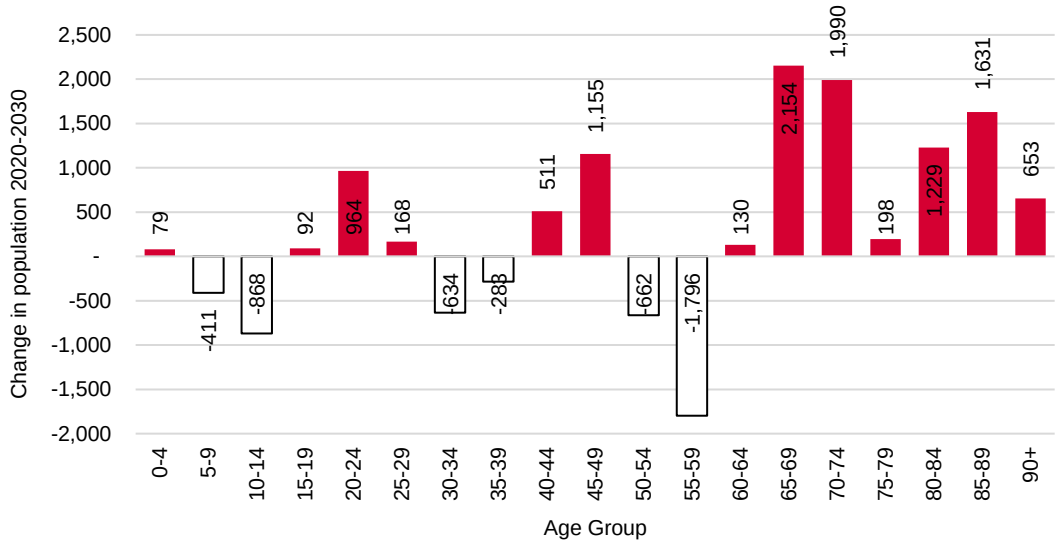


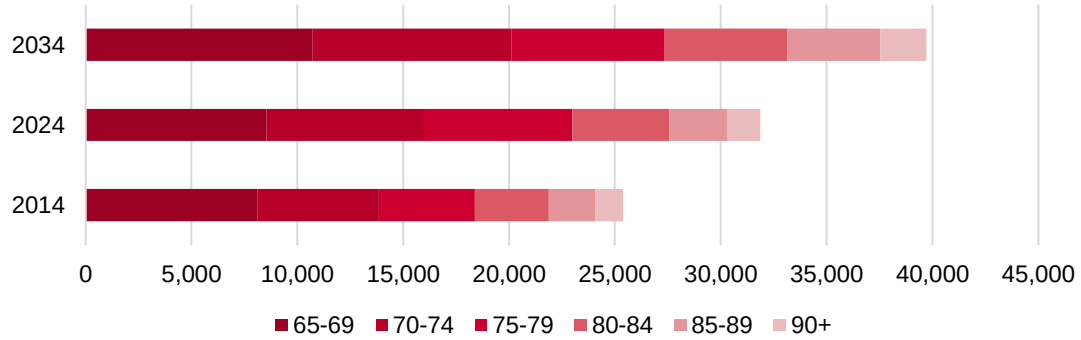
Table 5: PCA and Cotswold projected population change 2024-2034

	PCA			Cotswold		
	2024	2034	% Change	2024	2034	% Change
Under-65's	106,042	104,486	-1%	70,554	72,950	3%
65-69	8,548	10,702	25%	6,625	8,448	28%
70-74	7,436	9,426	27%	6,185	7,993	29%
75-79	7,020	7,217	3%	6,031	6,482	7%
80-84	4,579	5,807	27%	4,027	5,260	31%
85-89	2,750	4,381	59%	2,310	3,852	67%
90+	1,536	2,189	43%	1,317	1,916	46%
65+	**31,869**	**39,724**	**25%**	**26,493**	**33,950**	**28%**
75+	**15,885**	**19,595**	**23%**	**13,684**	**17,510**	**28%**
Total population	**137,912**	**144,210**	**5%**	**97,047**	**106,900**	**10%**

Source: Knight Frank Research, ONS

During the 2024-2034 period, the 65+ population in the PCA is expected to grow by 7,854 and the 75+ population by 3,710.

Figure 13: 65+ Population profile – PCA



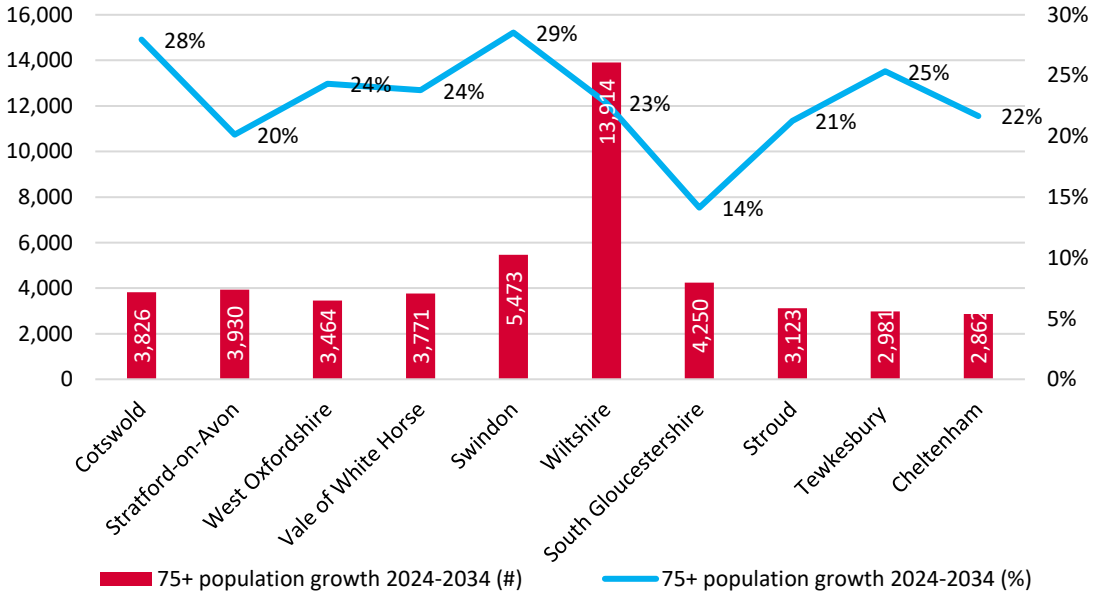
Source: Knight Frank Research, ONS, 2020 mid-year population estimates, 2018-based population projections
Note for PCA population projections, we have taken an average of growth figures from both Cotswold and Runnymede local authorities and applied this to the PCA population.
Note that we have included the latest data from the 2021 Census where available – this is for local authority, regional and national data only.

4f. Surrounding borough trends

The Cotswold senior's population is the second fastest growing in this area of the South West of England. With the exception of Swindon, Cotswold has the highest projected growth (in both absolute and percentage terms) of 75+ population over 2024-2034 period out of all the surrounding local authorities.

Population projections from the ONS suggest that by 2034, the 75+ population in Cotswold will grow by 3,826, constituting a 28% increase. The average increase across all neighbouring local authorities is 22%. This increased demand must be catered for with the increased provision of seniors housing.

Figure 16: Population projections of Cotswold and surrounding LAs 2024-2034



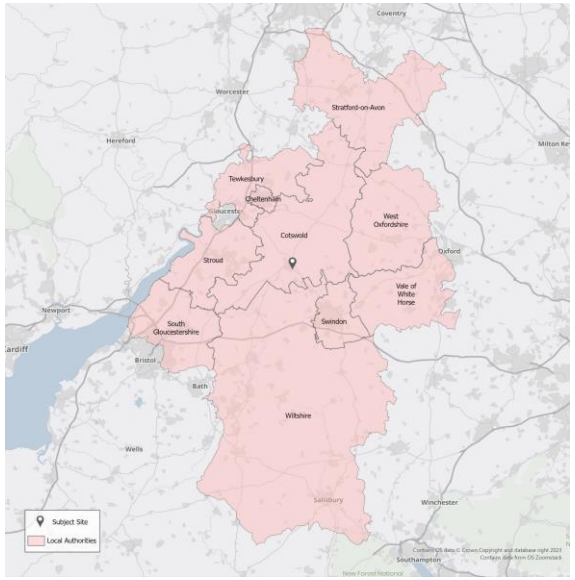


Figure 17: Cotswold Surrounding Local Authorities

Table 6: Surrounding Local Authorities projected population change 2024-2034

	2024 – 75+ Population	2034 – 75+ Population	75+ population growth 2024-2034 (%)	75+ population growth 2024-2034 (#)
Cotswold	13,684	17,510	28%	3,826
Stratford-on-Avon	19,508	23,438	20%	3,930
West Oxfordshire	14,243	17,707	24%	3,464
Vale of White Horse	15,854	19,625	24%	3,771
Swindon	19,172	24,645	29%	5,473
Wiltshire	61,150	75,064	23%	13,914
South Gloucestershire	30,096	34,346	14%	4,250
Stroud	14,676	17,799	21%	3,123
Tewkesbury	11,764	14,745	25%	2,981
Cheltenham	13,213	16,075	22%	2,862

Source: Knight Frank Research, ONS, 2020 mid-year population estimates, 2018-based population projections
Note: For PCA population projections, we have taken an average of growth figures from both Cotswold and Runnymede local authorities, and applied this to the PCA population.
Note that we have included the latest data from the 2021 Census where available – this is for local authority, regional and national data only.

4g. Need projections

We have used the ONS 2021 based population estimates and projections for the 75 population in Cotswold for 2024 and 2034.

The Housing LIN SHOP toolkit has then provided an indicative assessment of demand for seniors housing. As outlined on page 21, we will use the ratio for extra care (IRC) for sale units (as we understand that this is what is currently proposed), which equates to 30 units per 1,000 individuals aged 75+ plus 10 enhanced sheltered housing units per 1,000 individuals aged 75+. This gives a ratio of 40 units per 1,000 75+ population, translating to a 4% penetration/prevalence rate. This is outlined in the SHOP toolkit table below:

Table 7: Housing LIN Strategic Housing for Older People Resource Pack (SHOP)

Forms of Provision	Estimate of demand per thousand of the relevant 75+ population
Conventional sheltered housing to rent	60
Leasehold sheltered housing	120
Enhanced sheltered housing	20 (50% allocated to private for sale)
Extra care housing for rent	15
Extra care (IRC) housing for sale	**30**
Housing based provision for dementia	6

Table 8: Estimated need in PCA and Cotswold – 2024-2034

		2024	2034	Change #	Change %
PCA	75+ population	15,885	19,595	3,710	23%
	Estimated Units Needed	635	784	148	23%
		2024	2034	Change #	Change %
Cotswold	75+ population	13,684	17,510	3,826	28%
	Estimated Units Needed	547	700	153	28%

The toolkit suggests there is currently an estimated demand for 547 extra care (IRC) for sale units in Cotswold to cater for its existing 13,684 residents aged 75+. This is expected to rise over the next decade, with an additional 153 units required by 2034. It is therefore estimated that by 2034, there will be 17,510 individuals aged 75+ in Cotswold, with a need for 700 units, a growth of almost 28% in just ten years.

Regarding the extend of need for purpose-built seniors housing within the PCA, we are estimating a current need of 635 units in the PCA, increasing to 784 by 2034.

Estimates for Cotswold will differ to figures reported in the Gloucestershire SHMA (2016). This is due to our use of the latest ONS population projections (2021 based) and an updated HousingLIN SHOP toolkit, which were not available at the time of the SHMA published in 2016. Nonetheless, it is clear from both sets of figures that there is an increasing elderly population in Cotswold, with a growing demand for specialist housing for seniors across the area.

Whilst this methodology is well regarded in the market, this is a relatively simplistic view of demand. The toolkit uses population rather than household levels to assess demand. We believe that seniors will move or downsize as a household rather than individuals.

Moreover, this also does not consider any wealth or affordability metrics which would need to be understood to identify the true target market. In addition, the model focuses solely on the 75+ population and additional demand for leasehold Housing with Care housing does exist for the under 75 population. Despite this, the demand will continue to grow in the coming years.

Source for all tables and figures on this page: Knight Frank Research, ONS 2021 Census based population estimates and projection s, and the Housing LIN SHOP toolkit

4h. Additional Demand

As outlined earlier in this report, needs assessments are based on the population aged 75 as this is the age at which age and need typically converge, and there is a requirement for some level of support within the home The average entry age of a senior in a private extra care scheme is 77 (Knight Frank Annual Review 2023/24).

There will be additional 'need' for seniors housing from those aged 65 to 74 who would benefit from specialised extra care accommodation. There will be others aged 65-74 who may not have a 'need' but choose to do so for other reasons than their own requirement for assistance – we refer to this as 'demand'. Those aged 65-74 may choose to move into a seniors housing development if they wish to downsize, or to benefit from being part of a "community" of like-minded individuals. Demand will also come from those who are widowed who may seek more companionship or do not want the stress and expense of household maintenance.

This demand is difficult to measure as so much varies by individual preferences and area. There is no established metric for 'need' for extra care schemes for those aged under 75. Given that those aged 65-74 who move into seniors housing schemes will generally have less intensive care needs, they will also consider retirement housing schemes without the ability to provide on-site domiciliary care.

To assess the potential demand for the proposed development for those aged 65+, we have run scenarios based on the number of individuals aged 65-74 who may consider moving into leasehold extra care accommodation. This has been run at 1%, 2%, 3% and 4% proportions of the population aged 65-74. This has allowed us to illustrate scenarios for additional 'demand' from the younger age cohorts. Please note this is not a form of needs assessment.

Through assessing this potential additional demand both in Cotswold and the primary catchment area, it is clear that there is not nearly enough units (across both extra care and retirement housing) to accommodate even a 4% demand from the 65-74 age cohort in the PCA or Cotswold.

Table 9: Cotswold potential additional demand from 65-74 age cohorts – 2024-2034

	65-74 Population (2024)	65-74 Population (2034)	Change
Total population	12,819	16,441	3,622
Potential additional demand from younger cohorts			
Scenario A- 1%	128	164	36
Scenario B- 2%	256	329	72
Scenario C- 3%	385	493	109
Scenario C- 4%	513	658	145

Table 10: PCA potential additional demand from 65-74 age cohorts – 2024-2034

	65-74 Population (2024)	65-74 Population (2034)	Change
Total population	15,984	20,128	4,144
Potential additional demand from younger cohorts			
Scenario A- 1%	160	201	41
Scenario B- 2%	320	403	83
Scenario C- 3%	480	604	124
Scenario C- 4%	639	805	166

Source: ONS, Knight Frank

5. Supply landscape

5a. Seniors housing supply

Existing Supply

Using data from the Elderly Accommodation Counsel (EAC), we have assessed the current supply of seniors housing within the PCA and Cotswold. EAC classifies schemes into the following categories:

- Age Exclusive (falls within Knight Frank (KF) definition of Retirement Housing)
- Sheltered (falls within KF definition of Retirement Housing)
- Enhanced Sheltered (some schemes are included in KF definition of Housing with Care / IRC)
- Extra Care Housing (KF definition of Housing with Care / IRC)
- Close Care Housing

We outline provision of the above on pages 32-34, with separate analysis for both catchments. Note that there will be some overlap in terms of schemes appearing in both the PCA and Cotswold datasets. To assess the potential competition to this proposed seniors housing scheme, we have focused this analysis on higher care acuity and provision. We have broadly used EAC definitions for Extra Care and Enhanced Sheltered housing to identify comparable supply but used Knight Frank definition of IRC for reporting purposes.

Private new build IRC schemes are the most comparable to the proposed development. Traditional age exclusive sheltered housing has been included within the reporting but excluded in the existing comparable supply analysis.

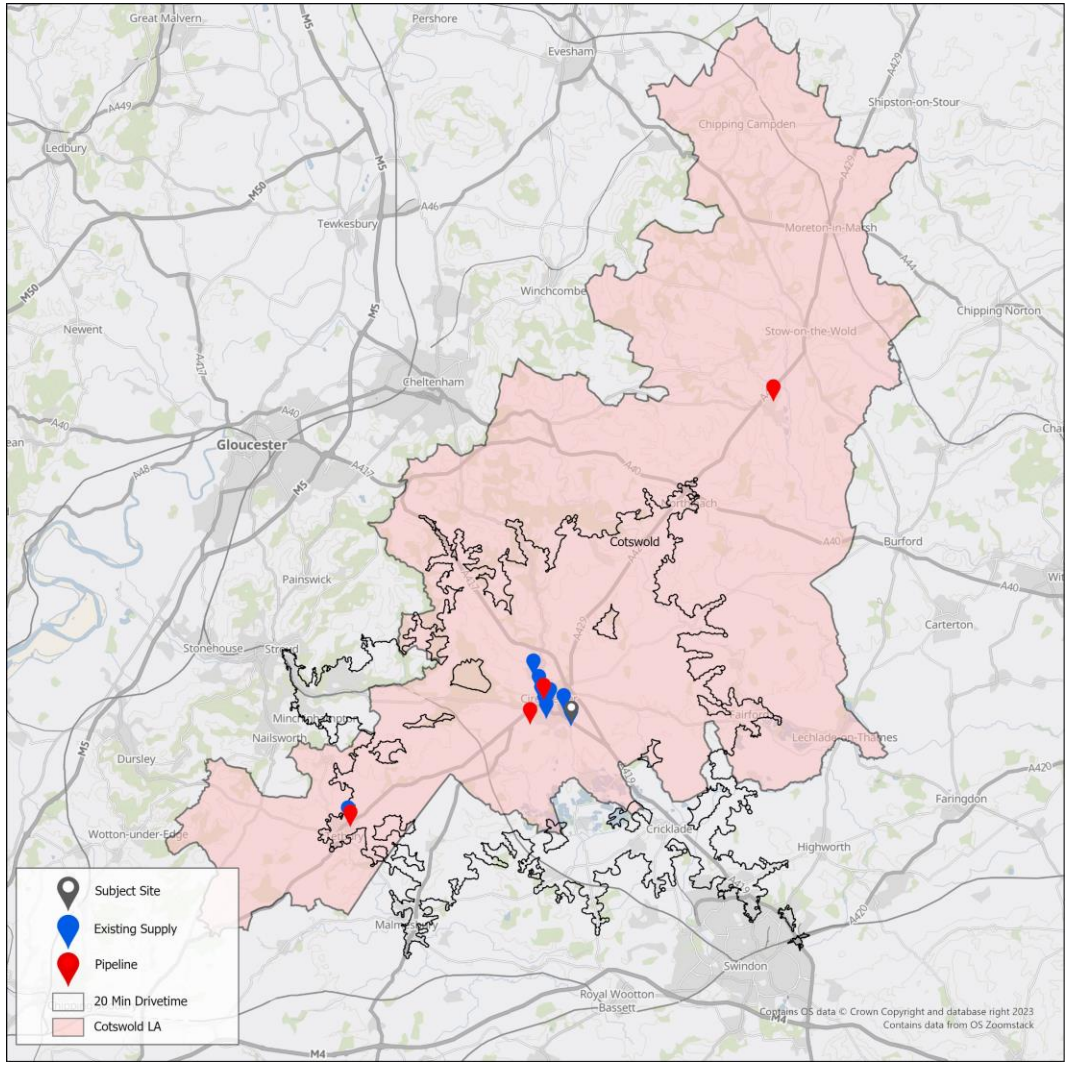
We have analysed schemes catering to the private market (both sales and rental), and therefore have excluded social housing schemes. This range encompasses schemes with different operating models at markedly different price points. Information on proposition, tenure, age, scheme size and amenity provision have been provided in Table 19.

Future Supply

We have reviewed the seniors housing pipeline in the PCA and Cotswold by identifying all schemes in the planning system with an application submitted for a private seniors housing scheme.

Using planning portals, we have conducted a comprehensive review of all planning applications updated over the last 12 months that fall within the boundaries. This is imperative in understanding which schemes will be comparable to the proposed scheme, once completed.

Figure 18: Existing and pipeline private seniors housing map in PCA and Cotswold



5b. Existing seniors housing supply - Cotswolds

Table 11: Existing seniors housing schemes in Cotswolds by tenure

	# units	# schemes	% of total units
Private Sale or Rental	1,225	34	56%
Social Housing	950	53	44%
Total existing stock	**2,175**	**87**	**100%**

Table 12: Existing seniors housing schemes in Cotswolds by age

	Private Sale or Rental		Social Housing	
	# units	# schemes	# units	# schemes
Unknown	32	1	27	3
Pre-1980	0	0	681	44
1980-1989	345	11	182	5
1990-1999	134	5	0	0
2000-2009	59	4	0	0
2010 onwards	655	13	60	1
Total existing stock	**1,225**	**34**	**950**	**53**

Table 13: Existing seniors housing schemes in Cotswolds by type

KF Definition	EAC Definition	Private Sale/Rent		Social Housing	
		# units	# schemes	# units	# schemes
Retirement Housing	Age Exclusive, Sheltered	896	28	799	49
IRC	Extra Care, Enhanced Sheltered	329	6	151	4

There are 2,175 existing seniors housing units in the Cotswolds District across 87 schemes. 56% of these are private units, equating to 1,225 units across 34 schemes.

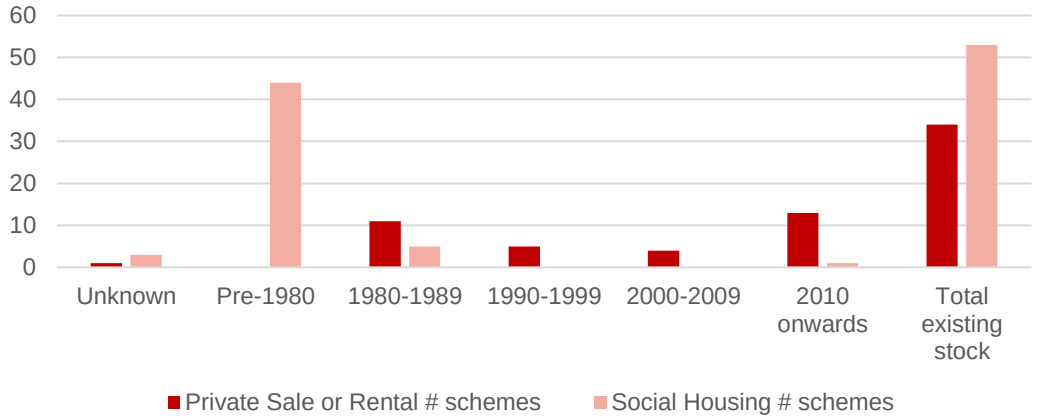
Of the 34 private schemes in the Cotswolds District 38% have been delivered since 2010.

There is a relatively limited supply of private seniors housing within Cotswolds District and as a result, there are only a handful of private IRC developments. These are outlined in the schedule in Table 14. Note that one of these existing schemes is Phase 1 of the Subject Site which comprises of 123 units.

Table 14: Summary of existing private schemes in Cotswolds

	# Private units	# Private schemes
Existing private stock	1,225	34
Existing private (leasehold) IRC stock	329	6
Existing private (leasehold) IRC stock built since 2010	304	4
Existing comparable private IRC schemes	329	6

Figure 19: Existing seniors housing schemes in Cotswolds by age



Source of all tables and figures on this page: Knight Frank, EAC

5c. Existing seniors housing supply - PCA

Table 15: Existing seniors housing schemes within PCA by tenure

	# units	# schemes	% of total units
Private Sale or Rental	1,029	28	56%
Social Housing	795	39	44%
Total existing stock	**1,824**	**67**	**100%**

Table 16: Existing seniors housing schemes within PCA by age

	Private Sale or Rental		Social Housing	
	# units	# schemes	# units	# schemes
Unknown	62	3	18	2
Pre-1980	0	0	560	32
1980-1989	324	9	95	3
1990-1999	82	3	62	1
2000-2009	63	3	0	0
2010-2019	304	7	60	1
2020 onwards	194	3	0	0
Total existing stock	**1,824**	**28**	**795**	**39**

Table 17: Existing seniors housing schemes within PCA by type

KF Definition	EAC Definition	Private Sale/Rent		Social Housing	
		# units	# schemes	# units	# schemes
Retirement Housing	Age Exclusive, Sheltered	847	25	735	38
IRC	Extra Care, Enhanced Sheltered*	182	3	60	1

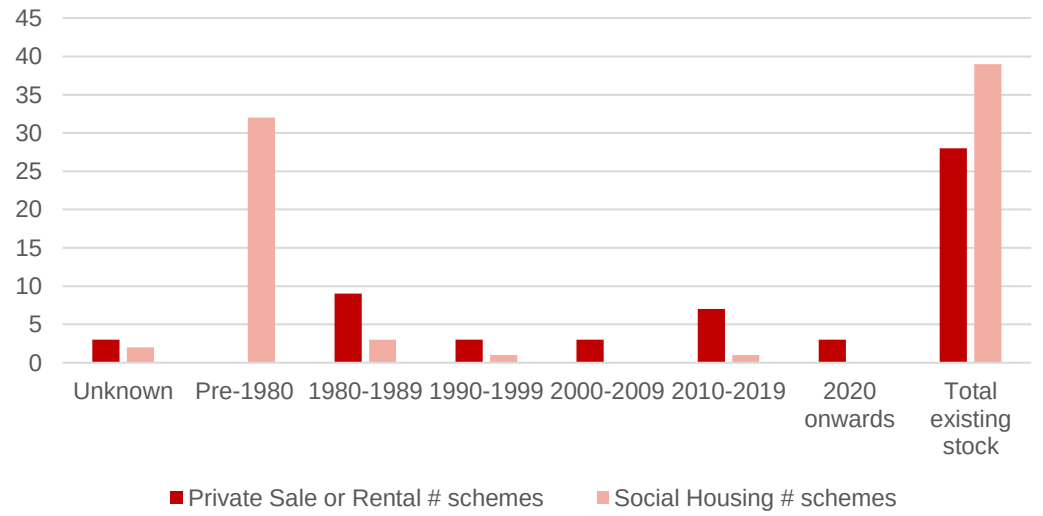
There are 1,824 existing seniors housing units within the primary catchment area across 67 schemes. 56% of these are private units, equating to 1,029 units across 28 schemes.

Of the 28 private schemes in the primary catchment area, 10 have been delivered since 2010, however this is including Phase 1 of the Subject Site which equates to 123 units.

Table 18: Summary of existing private schemes within PCA

	# Private units	# Private schemes
Existing private stock	1,029	28
Existing private (leasehold) IRC stock	182	3
Existing private (leasehold) IRC stock built since 2010	182	3
Existing comparable private IRC schemes	182	3

Figure 20: Existing seniors housing schemes within PCA by age



Source of all tables and figures on this page: Knight Frank, EAC

5d. Existing seniors housing supply schedule

Table 19: Private schemes in the Local Authority and PCA built since 2004

Scheme Name	Address	Year Built	Units	Tenure	Product	Care Provided	Operator	Market
Mill Place	Gloucester Street, Cirencester, Gloucestershire, GL7 2BG	2004	16	Private Sale	Retirement Housing	No	Cognatum Estates	PCA / Local Authority
Mulberry Court	Middle Mead Road, Cirencester, Gloucestershire, GL7 1GG	2011	60	Social Rent	Integrated Retirement Community	Yes	Housing 21	PCA / Local Authority
Westwood Court	Somerford Road, Cirencester, Gloucestershire, GL7 1TX	2006	14	Private Sale	Retirement Housing	No	Broadleaf Management Services	PCA
Stuart Court	Butt Street, Minchinhampton, Stroud, Gloucestershire, GL6 9JB	2007	33	Private Sale	Retirement Housing	No	Cognatum Estates	PCA
Townsend Court	Priory Way, Burton Hill, Malmesbury, Wiltshire, SN16 0FB	2012	28	Private Sale	Integrated Retirement Community	No	Kingsdale Group	PCA
Blunsdon Court	Lady Lane, Thamesdown Drive, Swindon, Wiltshire, SN25 2NA	2015	24	Private Sale	Retirement Housing	No	McCarthy Stone	PCA
Lewsey Court	London Road, Tetbury, Gloucestershire, GL8 8GW	2015	39	Private Sale	Retirement Housing	No	McCarthy Stone	PCA / Local Authority
Beecham Lodge	Somerford Road, Cirencester, Gloucestershire, GL7 1WR	2016	35	Private Sale	Retirement Housing	No	Churchill	PCA / Local Authority
Bath Gate Place	Hammond Way, Tetbury Road, Cirencester, Gloucestershire, GL7 1ZJ	2017	34	Private Sale	Retirement Housing	No	McCarthy Stone	PCA / Local Authority
Steepleton	Cirencester Road, Tetbury, Gloucestershire, GL8 8FQ	2017	113	Private Sale	Retirement Housing	No	Pegasus Homes	PCA / Local Authority
Stratton Court	Gloucester Road, Cirencester, Gloucestershire, GL7 2LA	2017	31	Private Sale	Integrated Retirement Community	Yes	Aura Care Living	PCA / Local Authority
Siddington Park Retirement Village*	, Siddington, Cirencester, Gloucestershire, GL7 6ET	2022	123	Private Sale	Integrated Retirement Community	Yes	Rangeford Villages	PCA / Local Authority
Leaholme Court	Cirencester, Gloucestershire, GL7 1EG	2023	44	Private Rent	Retirement Housing	No	Bromford	PCA
Kings Mews	Vicarage Gardens, Malmesbury, Wiltshire, SN16 9NZ	2023	27	Private Sale	Retirement Housing	No	GreenSquare	PCA

- Siddington Park refers to Phase 1 of the Subject Development. Phase 2 (the Subject Site) will provide an additional 57 units.

Source: Knight Frank, EAC, planning portals

5d. Existing seniors housing supply schedule

Table 19: Private schemes in the Local Authority and PCA built since 2004

Scheme Name	Address	Year Built	Units	Tenure	Product	Care Provided	Operator	Market
Leaholme Court	Cirencester, Gloucestershire, GL7 1EG	2023	44	Private Rent	Retirement Housing	No	Bromford	Local Authority
Brio Beechwood Park	Wintergreen Court, Fosseway, Stow-on-the-Wold, Gloucestershire, GL54 1FP	2021	106	Private Sale	Integrated Retirement Communities	Yes	Brio Retirement Living	Local Authority
Cotswold Gardens	Willow Road, Willersey, Broadway, Worcestershire, WR12 7QE	2020	12	Private Sale	Retirement Housing	No	Cognatum Estates	Local Authority
Hawkesbury Place	Fosseway, Stow-on-the-Wold, Cheltenham, Gloucestershire, GL54 1FF	2018	44	Private Sale	Integrated Retirment Communities	No	McCarthy Stone	Local Authority
Willoughby Place	Station Road, Bourton-on-the-Water, Cheltenham, Gloucestershire, GL54 2FF	2017	20	Private Sale	Retirment Housing	No	McCarthy Stone	Local Authority
Keatley Place	Hospital Road, Moreton-in-Marsh, Gloucestershire, GL56 0DQ	2017	34	Private Sale	Retirment Housing	No	McCarthy Stone	Local Authority
Saxon Grange	Sheep Street, Chipping Campden, Gloucestershire, GL55 6BY	2013	20	Private Sale	Retirement Housing	No	McCarthy Stone	Local Authority
Westwood Court	Somerford Road, Cirencester, Gloucestershire, GL7 1TX	2006	14	Private Sale	Retirement Housing	No	Broadleaf Management Services Ltd	Local Authority

Source: Knight Frank, EAC, planning portals

5e. Future seniors housing supply

Using the Cotswolds District and other local authorities planning portals, we have identified the following applications as containing seniors housing units.

Within Cotswolds, there are only two applications for private Senior's Housing, as listed below:

- The Steadings – Outline Plans granted for the application for the construction of up to 2,350 residential units including 60 homes from the elderly.
- Farrell Close Retirement Living Apartment – Pre-planning for the redevelopment of up to 70 retirement living apartments, including communal facilities, access, car parking and landscaping and up to 280 sqm of commercial space.

There are currently no Integrate Retirement Housing developments in planning. The majority of Senior's Housing development comprises of retirement housing.

Table 20: Pipeline summary for PCA and Cotswolds District

	PCA		Cotswold	
Private IRC pipeline schemes	# Private IRC units	**# Private IRC schemes**	# Private IRC units	**# Private IRC schemes**
Planning granted or under construction	60	1	-	-
Planning submitted	63	1	56	1
Pre-planning	70	1	-	-
Total pipeline to be delivered by 2034	193	3	56	1

Key

Private IRC scheme in Cotswold Local Authority (also falls in PCA)

Private IRC scheme in PCA

Table 21: Pipeline seniors housing schemes in PCA and Cotswolds District (continued on next page)

Scheme Name	Address	Developer	Description	Tenure	Product	Care Provided	Planning Stage	Contract Stage	Seniors Housing units	Application Number	Local Authority	Market
The Steadings	Land At Chesterton Farm, Cranhams Lane,Cirencester,Gloucestershire,GL7 6JP	Bathurst Development Ltd	Scheme comprises outline application for a mixed-use development comprising demolition of buildings and the construction of up to 2,350 residential units with 50% affordable housing units, SUDS and natural ventilation (including up to 100 units of student accommodation and 60 homes for the elderly)	Social Housing	RH	No	Outline Plans Granted	Start On Site	60	16/00054/OUT	Cotswold	PCA
Farrell Close Retirement Living	Tesco, Farrell Close,Cirencester,Gloucestershire,GL7 1HW	Churchill Retirement Living	Scheme comprises redevelopment to form up to 70 retirement living apartments, including communal facilities, access, car parking and landscaping and up to 280sqm of commercial space (class e).	Private Housing	RH	No	Pre-Planning	Contract Awarded	70	24/01030/SCR	Cotswold	PCA

Source: Knight Frank, EAC, planning portals

5e. Future seniors housing supply

Table 21: Pipeline seniors housing schemes in PCA and Cotswolds District (continued)

Scheme Name	Address	Developer	Description	Tenure	Product	Care Provided	Planning Stage	Contract Stage	Seniors Housing units	Application Number	Local Authority	Market
Care Village – Phase 2 – Steepleton, Tetbury	Steepleton Court,Cirencester Road,,Tetbury,Gloucestershire,GL8 8FQ	Lifestory	Scheme comprises construction of buildings to expand an existing care village it houses a total of 63 apartments including 42 one bedroom apartments and 21 two bedroom apartments together with landscaping, parking, access and associated works.	Private Housing	RH	No	Detailed Plans Submitted	Pre-Tender	63	23/02424/FUL	Cotswold	PCA
Station Road, Cheltenham	Station Road (Former Co-Op Sit,Station Road,Bourton-on-the-Water,Cheltenham,Gloucestershire,GL54 2EP	Lifestory	Scheme comprises demolition of existing buildings, hardstanding and Phased redevelopment to provide a) residential units(18 market housing units and 8 affordable housing units comprising 2 one bedroom, 10 two bedroom, 8 three bedroom and 6 four bedroom) b) 56 retirement housing comprising 36 one bedroom and 20 two bedroom and c) shared access drive, with each Phase being an independent act of development, along with landscaping, laying of roads, parking, drainage, energy centre and other associated works including sustainable urban drainage system.	Private Housing	RH	No	Detailed Plans Submitted	Contract Awarded	56	24/00627/FUL	Cotswold	Local Authority

Source: Knight Frank, EAC, planning portals

6. Conclusions

6a. Needs Assessment

We have applied the Housing LIN SHOP toolkit methodology to assess the potential demand for private IRC units in the PCA and Cotswold Local Authority. This is based on a ratio of 30 leasehold extra care (IRC) and 10 enhanced sheltered units required per 1,000 individuals aged 75+, totalling a ratio 40 of units per 1,000, a prevalence rate of 4%. Current population figures (2020 mid-year estimates) for 2024 have been used alongside 2018-based population projections for 2034. Note that the latest Census data for 2021 has been incorporated for local authority, regional and national figures, where possible. This has enabled us to fully understand any potential increase in 75+ population which may increase the need for greater provision.

The population and demand figures have been analysed alongside existing and pipeline supply of seniors housing in the PCA and Cotswold to estimate the potential shortfall of provision. The full supply pipeline has been assessed from pre-app stage to under construction/imminent completion. Only private units with planning submitted, planning granted or under construction have been included in the current demand supply balance analysis, on the basis that these have a higher likelihood of completion compared to those in the pre-app stages.

Analysis indicates there is a current need for 547 private extra care (IRC) for sale units in Cotswold to provide for a 75+ population of 13,684. Currently, there is only a small provision of private IRC in the local authority, resulting in an estimated shortfall of 218 units. The PCA has a higher population density than the wider local authority, and as such has a higher need – 635 units with a current shortfall of 453 units.

ONS projections forecast a significant increase in the number of individuals aged 75+ in Cotswold. On this basis, we have calculated there will be a need for 700 private IRC units in Cotswold by 2034, and 784 units in the PCA.

Alongside these projections is a small pipeline of private IRC units – 56 units in Cotswold local authority, and 193 units in the wider PCA. As a result, we estimate the shortfall of private IRC units will marginally reduce by 2034, however there will still be an undersupply of 315 units in Cotswold and 409 units in the PCA. Our methodology assumes that all schemes in the pipeline will be built out. In reality this may not be the case, so we might expect the actual shortfall to be higher than illustrated in this report. This is owing to the uncertainty regarding whether or not a scheme will be completed. In addition, our analysis is based on the Housing LIN SHOP toolkit methodology, which does not take into account the significant population aged 65-74, some of which will need, or choose to move into an IRC development. As outlined on page 29, should 4% of the 65-74 population require IRC units, there would be a need for 658 units in Cotswold and 805 in the PCA by 2034, in addition to the need from the 75+ population.

As it stands, it is clear that an increased provision of seniors housing is required to meet the growing need in Cotswold. The proposed second phase of Siddington Park will help address the need for purpose-built seniors housing in PCA and wider local authority.

Table 22: Estimated current demand supply balance (2024)

Demand	PCA	Cotswold
75+ population (2024)	**15,885**	**13,684**
Estimated need for units*1	635	547
Supply		
Existing private extra care (IRC) units	182	329
Demand supply balance		
Estimated shortfall	**453**	**218**

Table 23: Estimated future demand supply balance (2034)

Demand	PCA	Cotswold
75+ population (2034)	**19,595**	**17,510**
Estimated need for units*1	784	700
Supply		
Existing units	182	329
Pipeline private extra care (IRC) units with planning granted or under construction*3	60	0
Pipeline private extra care (IRC) units with planning submitted	63	56
Pipeline private extra care (IRC) units currently at pre-app stage	70	0
Total projected private extra care (IRC) supply in 2034 *2	375	385
Demand supply balance in 2034		
Estimated shortfall (including all schemes in planning process including pre-apps) in 2034	**409**	**315**

*1 Need is based on SHOP toolkit table on page 25 for extra care for sale units.
*2 includes schemes in the pipeline with either planning approved or submitted. This excludes schemes in the pre-planning stage and schemes which have had planning refused
*3 assumes all schemes currently in planning are completed and added to total supply.
Source for all tables and figures on this page: Knight Frank, Housing LIN, ONS, EAC, local authority planning portals

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Disclaimer

The report has been prepared as a needs assessment on the behalf of Rangeford in relation to their planning application for the development of a seniors housing scheme at Siddington Park, Cirencester, GL7 6GU.

It must not be used for any other purpose. It must not be disclosed to any other parties except to the relevant planning authority. We are not advising on your planning application or providing any planning services. Rangeford agree that (and the report will be endorsed): “This report was prepared according to the information and instructions provided to us by Rangeford and is provided on a non-reliance basis. Knight Frank LLP (and our affiliates, members and employees) will have no responsibility or liability whatsoever in relation to the accuracy, reliability, currency, completeness or otherwise of its contents or as to any assumption made or as to any errors or for any loss or damage resulting from any use of or reference to the contents.” We have utilised several different resources to collate information on demographics and the existing care provision.

All investigations have been undertaken on a desktop basis, and whilst we have made all reasonable endeavours to ensure the accuracy of the information, we have not visited planned sites and competing schemes to qualify information.

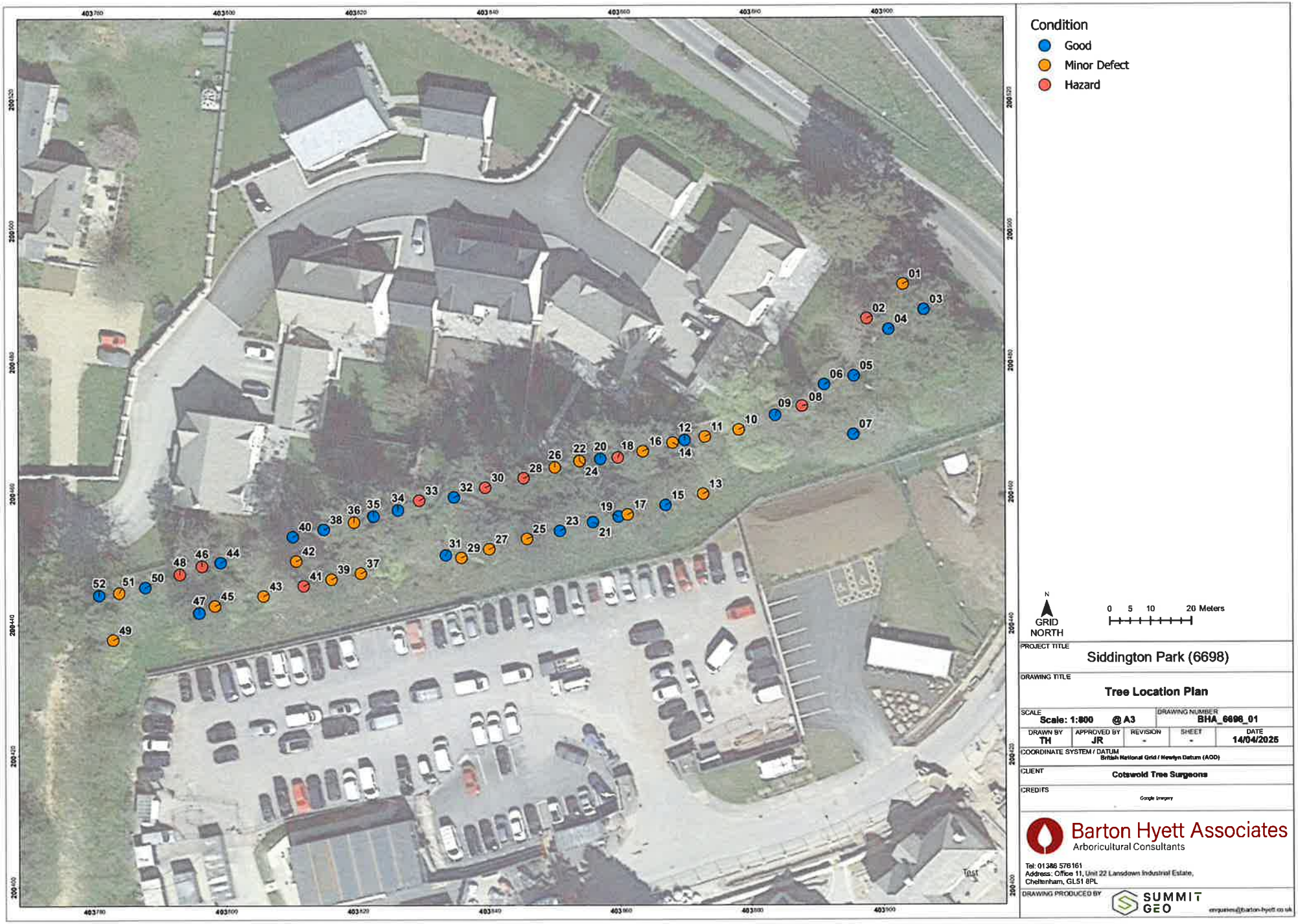
We have relied upon the information supplied by the data sources used and assume this information to be correct for the purposes of this needs assessment report.

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Condition
Good
Minor Defect
Hazard
N
GRID NORTH
0 5 10 20 Meters
PROJECT TITLE
Siddington Park (6698)
DRAWING TITLE
Tree Location Plan
SCALE
Scale: 1:800 @ A3
DRAWING NUMBER
BHA_6698_01
DRAWN BY
TH
APPROVED BY
JR
REVISION
-
SHEET
-
DATE
14/04/2025
COORDINATE SYSTEM / DATUM
British National Grid / Newlyn Datum (AOD)
CLIENT
Cotswold Tree Surgeons
CREDITS
Google Imagery
Barton Hyett Associates
Arboricultural Consultants
Tel: 01386 576161
Address: Office 11, Unit 22 Lansdown Industrial Estate, Cheltenham, GL51 8PL
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SUMMIT GEO
enquiries@barton-hyett.co.uk

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COTSWOLD
District Council

TOWN AND COUNTRY PLANNING ACT 1990

TREE PRESERVATION ORDER APPLICATION PERMISSION

Agent
Cotswold Tree Surgeons
Hazledene
100 Paven Hill
Purton
SN5 4DB

Applicant
Rangeford Villages
Cedar Grange
13 Lime Crescent
Siddington Park
Siddington
Cirencester
Gloucestershire
GL7 6GU

T2 - Lime: Pollard at 3m to prevent future breakout/failure. T12 - Monterey Cypress: Fell as part of good management, unsuitable for long term retention. T18 - Monterey Cypress: Fell to prevent future failure. T22 - Monterey Cypress: Fell as part of good management, unsuitable for long term retention. T24 - Monterey Cypress: Fell as part of good management, unsuitable for long term retention. T26 - Monterey Cypress: Fell as part of good management, unsuitable for long term retention. T28 - Maple: Fell to prevent future failure over adjacent property. T30 - Monterey Cypress: Fell as part of good management, unsuitable for long term retention. T33 - Monterey Cypress: Fell as part of good management, unsuitable for long term retention. T35 - Monterey Cypress: Fell as part of good management, unsuitable for long term retention. T46 - Monterey Cypress: Fell as part of good management, unsuitable for long term retention. T48 - Monterey Cypress: Fell as part of good management, unsuitable for long term retention. T51 - Monterey Cypress: Fell as part of good management, unsuitable for long term retention. Reduce length of all branching from all trees overhanging boundary to the north back to fence line at Cedar Grange 13 Lime Crescent Siddington Park Siddington Cirencester Gloucestershire

APPLICATION REF: 25/02115/TPO
TPO REF: PP-14156315

DATE OF DECISION: 2nd September 2025

DECISION NOTICE

In pursuance of their powers under the above Act, the Council **PERMITS** the above proposal in accordance with the details given on the application form and submitted plans. Permission is given subject to the following **conditions:**

1 Following the felling of the trees authorised by this consent, 12 new trees must be planted as replacements for the trees to be removed. The replacement trees may be selected from the following list of species or may be of an alternative species if agreed in writing with the Council's Tree Officer:

Oak (Querus robur)
Beech (Fagus sylvatica)
Birch (Betula sp)
Scots Pine (Pinus sylvestris)
The replacement trees must be a minimum Nursery standard size (8-10 cm in trunk circumference - British Standard 3936 - Part1: Nursery stock specification for trees and shrubs), at the time of planting and must be planted within a 10m radius of the felled trees during the planting season following, or at the time of felling the trees. They must be supported by a correctly installed stake and tree ties. The trees are to be staked, protected and mulched. All works to accord with BS 3936-1:1992 Nursery stock. Specification for trees and shrubs and BS 4428:1989 Code of practice for general landscape operations (excluding hard surfaces) and BS 8545:2014 Trees: from nursery to independence in the landscape - Recommendations.
Should the replacement trees be removed, die or become severely damaged or seriously diseased, within 5 years of planting, they must be replaced by trees of a similar size and species to that originally planted.
Any modifications to the requirements of this condition must be agreed in writing with the Council's Tree Officer.
PLEASE NOTE: the requirement to replant is the responsibility of the tree owner even if another party has submitted the application.
The Council's Tree Officer should be notified in writing as soon as the tree planting has been carried out.
Reason: To ensure that the trees are replaced for the benefit of the amenity of the area and in order to preserve the visual amenities which exist at present on the site.

INFORMATIVES :-

1 If the trees are not in your ownership, you will require the permission of the owner before any works can be carried out.

2 Work to trees can have detrimental impacts on protected wildlife species. All British birds, their nests and eggs (with certain, very limited exceptions) are protected by law, as are all bat species and their roosts (even when unoccupied). Prior to commencing work you should ensure that bats and bat roosts; and nesting birds and birds' nests will not be adversely affected. If you suspect that a bat or a bat roost is likely to be affected by the proposed works, you should consult Natural England (www.naturalengland.org.uk).

Your attention is drawn to the NOTES overleaf.

Geraldine LeCointe

Geraldine LeCointe
Assistant Director of Planning Services

Cotswold District Council, Trinity Road, Cirencester, Gloucestershire, GL7 1PX

INFORMATION ABOUT THIS DECISION

This is the Council's formal decision on your application. As your application has been agreed, conditions may have been attached. It is very important that you take careful note of the conditions and comply with them. If there is anything about the decision or conditions that you do not understand, then please contact Customer Services, Cotswold District Council, Trinity Road, Cirencester, Gloucestershire, GL7 1PX Tel 01285 623000.

ENFORCEMENT

It is very important that you comply with the Council's decision. As your application has been allowed, you must follow the agreed plans carefully and comply with the conditions.

If you fail to comply with this Decision Notice, then you could be in contravention of the Town and Country Planning Act 1990 or other legislation. In such circumstances, the Council may well initiate enforcement action.

APPEALING AGAINST A DECISION

If you disagree with the Council's decision, you can appeal to the Secretary of State against any of the conditions that have been imposed under Section 78 of the Town and Country Planning Act 1990.

Your appeal must reach the Planning Inspectorate within 28 days from receipt of this decision.

The Secretary of State can allow longer for you to lodge an appeal, but only in cases where there are special reasons which excuse the delay in giving notice of appeal.

To appeal, you must complete a form which you can obtain from The Planning Inspectorate, Tree and Hedges, 3B Eagle Wing, Temple Quay House, 2 The Square, Temple Quay, Bristol BS1 6PN treeandhedgeappeals@planninginspectorate.gov.uk
Tel: 0303 444 5570

Some personal information will be displayed on this website, please contact the Planning Inspectorate if you have any concerns.

The Secretary of State need not consider an appeal if it seems to him that the Council have no option under planning legislation but to refuse permission or impose a particular condition, having regard to the statutory requirements, the provisions of any development order and to any directions given under a development order.

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COTSWOLD
District Council

Council name	**COTSWOLD DISTRICT COUNCIL**
Name and date of Committee	**PLANNING AND LICENCING COMMITTEE - 11 FEBRUARY 2026**
Subject	**PROPOSED REFORMS TO THE NATIONAL PLANNING POLICY FRAMEWORK (NPPF) AND OTHER CHANGES TO THE PLANNING SYSTEM**
Wards affected	All
Accountable member	Councillor Juliet Layton Deputy Leader of Cotswold District Council and Cabinet Member for Housing and Planning Email: Juliet.Layton@cotswold.gov.uk
Accountable officer	Geraldine LeCointe – Assistant Director of Planning Services Email: Geraldine.LeCointe@cotswold.gov.uk
Report author	Geraldine LeCointe – Assistant Director of Planning Services Email: Geraldine.LeCointe@cotswold.gov.uk
Summary/Purpose	To advise Planning and Licensing Committee of the current NPPF consultation, agree the consultation response on behalf of the Council and to seek delegated authority to respond to a second consultation on Design and Placemaking guidance.
Annexes:	Annex A: CDC Responses to Consultation Questions
Recommendation(s)	That the Planning and Licencing Committee resolves to: 1. Grant delegated authority to the Director of Communities and Place to make the final submission of comments on the consultation, having regard to further comments made by the committee at and after the meeting and in consultation with the Cabinet Member for Housing and Planning, and 2. Grant delegated authority to the Director of Communities and Place in consultation with the Cabinet Member for Housing and Planning to submit comments on recent consultation on Design and Placemaking Planning Practice

COTSWOLD
District Council

	Guidance – Public Consultation
Corporate Priorities	(Select which ones apply from the list below) • Delivering Good Services • Responding to the Climate Emergency • Delivering Housing • Supporting Communities • Supporting the Economy
Key Decision	NO
Exempt	NO
Consultees/ Consultation	

COTSWOLD
District Council

1. EXECUTIVE SUMMARY

1.1 The Planning and Licensing Committee's views are sought on the draft responses to the new NPPF consultation attached to this report.

2. BACKGROUND

2.1 The Government published a new draft National Planning Policy Framework (NPPF or "the Framework") on 16 December, which is open for consultation until 10 March 2026. The draft represents a substantial change to and expansion of the existing Framework, increasing its length from 69 pages to 100 pages, supported by a further 25 pages of annexes.

2.2 The document introduces a significant restructuring of the Framework. Instead of the current format of consecutively numbered paragraphs, the draft is arranged into thematic chapters, each containing separate plan-making policies and decision-making policies. The latter replaces what were previously termed national development management policies. Policies are now presented as numbered policy statements, mirroring the format commonly used in local plans. According to the consultation, this revised structure is intended to improve clarity and ease of reference.

2.3 The Government has also indicated that a final new version of the NPPF is expected to be published around early summer 2026.

2.4 The purpose of this report is to provide an overview of the proposed changes and, where possible, to highlight the potential implications for Cotswold District.

3. MAIN POINTS

3.1 The following provides a summary of the National Planning Policy Framework consultation proposals. It does not provide an exhaustive list of every proposal and instead focusses on the issues that are most important to Cotswold District.

3.2 In summary, the consultation proposals include:

THE LOCAL PLAN

i. **Transitionary arrangements** – The consultation proposes that plans being examined under the current system can continue to be examined under the NPPF (December 2024). However, nationally set development management policies will be implementable at the point of publication of the revised NPPF, and where there is a conflict with the adopted local plan, take precedence and that that "*development plan policies should be afforded very little weight where inconsistency arises, except where they have been examined and adopted against the new Framework*".

ii. **Timing of the NPPF consultation** – The timing of the NPPF consultation is unfortunate. The consultation ends on 10th March 2026 and is expected to be implemented in summer 2026. The timetable for delivering the Council's Local Plan includes a consultation on the pre-submission draft Local Plan (formally known as a Regulation 19 consultation) in summer 2026. This date is improvable in order to hit government's immovable deadline to submit Local Plans for examination under the current planning regulations by December 2026. This means the Council may have little time to adapt its Local Plan policies to the updated NPPF, but consideration will be given to incorporating the draft policies to minimise conflict in the future.

iii. **December 2026 Local Plan submission date confirmed** – The government has confirmed that all plans being examined under the current planning regulations must be submitted to the Secretary of State for examination by December 2026.

iv. **Spatial Development Strategies (SDS)** – Proposed Policy PM1 establishes a new framework for strategic planning, requiring strategic planning authorities to prepare an SDS. These strategies are intended to articulate a clear, forward-looking vision for growth and change across wider sub-regional areas, focusing on genuinely strategic matters while leaving more detailed policy considerations to other components of the development plan. SDSs must outline a long-term approach to achieving sustainable growth over a minimum 20-year period, including distributing objectively assessed housing and other development needs among the local planning authorities within the strategy area.

PLANNING APPLICATION DETERMINATION

v. **National Development Management Policies (NDMPs)** – The draft NPPF includes a suite of NDMPs. Although the Government has indicated that the new

NDMPs are intended to be nonstatutory, the consultation confirms that this position is still "under review". Importantly, even in a nonstatutory form, the NDMPs would still constitute a material consideration in the determination of planning applications – the same situation as existing NPPF policies.

vi. **Conflict with adopted Local Plan policies** – Once the NPPF comes into effect, any adopted Local Plan policies that conflict in any way with the NDMPs set out in the NPPF will carry only very limited weight in planning decisions.

vii. **Development in settlements** – Within settlements, planning applications would be approved "unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework". Examples of adverse impacts include where a scheme would undermine land is designated or protected for specific purposes in the Local Plan, or where it would breach key safeguarding policies. However, no definition is given to what constitutes a settlement or land 'within' it (e.g. size of the settlement), which is extremely problematic in terms of the proposals potentially opening the door to development in rural locations with limited access to services, facilities, employment, etc., and the resultant reliance on private car use and increased CO2 emissions.

viii. **Development outside settlement** – Policy S5 sets out the limited circumstances in which development may be supported outside settlements, allowing only specified types – such as agriculture, rural enterprise, reuse of permanent buildings, redevelopment of brownfield land, limited infilling, rural exception sites, traveller accommodation, well located housing near highly connected railway stations, and allocated sites or proposals meeting unmet needs – while requiring all such schemes to be approved only where their benefits are not substantially outweighed by adverse impacts when assessed against the national decision making policies in the NPPF.

ix. **New titled balance** – A revised approach to decision making for development outside settlements is proposed. Unless the benefits granting permission would substantially outweigh any adverse effects (when assessed against the NPPF's decision-making policies) proposals for housing should be approved where they:

- are situated within walking distance of well-connected railway stations (note, currently neither Kemble or Moreton-in-Marsh meet the requirements to be classified as a well-connected railway station);
- meet a proven unmet need – such as where a five year housing land supply cannot be demonstrated or where the most recent Housing Delivery Test score is below 75% – provided the site relates well to an existing settlement and the scale of development proposed can be accommodated taking into account the existing or proposed availability of infrastructure; involves the redevelopment of previously developed land; or
- are an exception site, involve development brought forward under a Community Right to Build Order or Neighbourhood Development Order.

4. CONSULTATION RESPONSE

4.1 A NPPF consultation response will be prepared and submitted to the Government before the 10th March 2026 deadline, along with an accompanying letter highlighting key issues of importance.

4.2 With regard to the Design and Placemaking Planning Practice Guidance – Public Consultation Design and Placemaking Planning Practice Guidance: consultation document - GOV.UK, a consultation response will be submitted by 10th March 2026, also with an accompanying letter highlighting the Council's key issues.

5. FINANCIAL IMPLICATIONS

5.1 There are no direct financial implications arising from this report or from the submission of the Council's consultation responses to the draft National Planning Policy Framework and the Design and Placemaking Planning Practice Guidance. Preparing and submitting the responses will be delivered within existing staff resources and approved budgets.

5.2 The proposed changes to the National Planning Policy Framework and related guidance could lead to future resource pressures and associated financial implications. The scale of reform, including new national policies, the introduction of Spatial Development Strategies, and the need to ensure Local Plan alignment, is expected to

place additional demands on planning services over time and will need to be kept under review.

6. LEGAL IMPLICATIONS

6.1 The consultation and response itself has no legal implications, however legal advice to support departmental officers may be required in respect of plan making and decision making once the new NPPF takes effect.

7. RISK ASSESSMENT

7.1 The risk to the Council lies in not making its views known to the Government if a consultation response is not submitted.

8. EQUALITIES IMPACT

8.1 Not applicable

9. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

9.1 Not applicable at this stage.

END

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Annex A: Cotswold District Council responses to consultation questions on 'Proposed reforms to the National Planning Policy Framework and other changes to the planning system'

Consultation Question	***Cotswold District Council Response***
1) Do you have any views on how statutory National Development Management Policies could be introduced in the most effective manner, should a future decision be made to progress these?	*Unnecessary, don't know what being statutory would achieve.*
2) Do you agree with the new format and structure of the draft Framework which comprises separate plan-making policies and national decision-making policies? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*	*Agree*
a) Please provide your reasons, particularly if you disagree.	*However, there is a risk that over rigid national decision-making policies will not sufficiently recognise the complexity of planning in National Landscapes.*
3) Do you agree with the proposed set of annexes to be incorporated into the draft Framework? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*	*Agree*
a) Please provide your reasons, particularly if you disagree.	*Housing land supply in one section is useful, makes NPPF shorter, can go straight to one annex, direct resource, referencing is easier*
4) Do you agree with incorporating Planning Policy for Traveller Sites within the draft Framework? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*	*Partly agree*

Annex A: Cotswold District Council responses to consultation questions on 'Proposed reforms to the National Planning Policy Framework and other changes to the planning system'

Consultation Question	***Cotswold District Council Response***
a) Please provide your reasons, particularly if you disagree.	*A single consolidated Framework is logical, but Traveller site identification requires sensitive engagement, and detailed site specific assessments.*
5) Do you agree with the proposed approach to simplifying the terminology in the Framework where weight is intended to be applied? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*	*partly agree*
a) Please provide your reasons, particularly if you disagree	Whilst the consistent use of 'substantial' for weighting across the document is beneficial for consistency and comparison, from a pragmatic perspective, the word 'substantial' is already used in relation to harm, where it has a specific meaning. It is clearer to use a different word for the harm and weighting, rather than using 'substantial' again, which becomes repetitious, less clear and potentially more confusing for applicants; for example, when 'substantial weight' is given to harm that is below the 'substantial harm' threshold. Perhaps both consistency and clarity would be served by using 'substantial weight', but in changing 'substantial harm' to 'considerable harm'.
6) Do you agree with the role, purpose and content of spatial development strategies set out in policy PM1? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*	*Agree*

Annex A: Cotswold District Council responses to consultation questions on 'Proposed reforms to the National Planning Policy Framework and other changes to the planning system'

Consultation Question	*Cotswold District Council Response*
a) Please provide your reasons, particularly if you disagree.	Needs to be considered in wider spatial strategy, context. Chapter 2, part 6 (and the glossary) should include town councils as well as parish councils and neighbourhood forums.
7) Do you agree that alterations should be made to spatial development strategies at least every 5 years to reflect any changes to housing requirements for the local planning authorities in the strategy area? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*	*Agree*
a) If not, do you think there should be a different approach, for example, that alterations should only be made to spatial development strategies every five years where there are significant changes to housing need in the strategy area?	Refresh, captures government policy changes but review not guaranteed alteration e.g. resetting housing targets review not a guaranteed alteration.
8) If spatial development strategies are not altered every five years, should related policy on the requirements used in five year housing land supply and housing delivery test policies, set out in Annex D of the draft Framework, be updated to allow housing requirement figures from spatial development strategies to continue to be applied after 5 years, so long as there has not been a significant change in that area's local housing need? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	*Agree*
a) Please provide your reasons, particularly if you disagree.	*N/A*

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Consultation Question	*Cotswold District Council Response*
9) Do you agree with the role, purpose and content of local plans set out in policy PM2? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*	*Agree*
a) Please provide your reasons, particularly if you disagree.	*N/A*
10) Do you think that local plans should cover a period of at least 15 years from the point of adoption of the plan? Yes/No	*Yes*
a) If not, do you think they should cover a period of at least 10 years, or a different period of time. Please explain why.	*N/A*
11) Do you agree with the principles set out in policy PM6(1c), including its provisions for preventing duplication of national decision-making policies? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	*Agree*
a) Please provide your reasons, particularly if you disagree.	Centralisation of policy does speed up decision making, but not always one size fits all, would complementary policies avoid limitations, opening up land that might not have come forward otherwise?
12) Do you agree with the approach to initiating plan-making in PM7? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Partly agree
a) Please provide your reasons, particularly if you disagree	Sceptical about how plans will be delivered within timeframe.

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Consultation Question	*Cotswold District Council Response*
13) Do you agree with the approach to the preparation of plan evidence set out in policy PM8? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Agree
a) Please provide your reasons, particularly if you disagree.	N/A
14) Do you agree with the approach to identifying land for development in PM9? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*	Agree
a) Please provide your reasons, particularly if you disagree.	N/A
15) Do you agree with the policies on maintaining and demonstrating cross-boundary cooperation set out in policy PM10 and policy PM11? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Agree
a) Please provide your reasons, particularly if you disagree.	In principle yes, but concerns over resources, deliverability, reliance on third parties, can't guarantee third party stakeholders will respond in a timely manner.
16) Do you agree that policy PM12 increases certainty at plan-making stage regarding the contributions expected from development proposals? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Agree
a) Please provide your reasons, particularly if you disagree.	In principle agree, but dependent on future viability guidance, varying approaches impacts transparency, good to include but more

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Consultation Question	*Cotswold District Council Response*
	guidance needed to improve transparency. Ensuring that policy requirements clearly reflect affordable housing tenure requirements is also beneficial from the perspective of providing clarity around expected affordable housing and delivery via the planning system.
17) Do you agree that plans should set out the circumstances in which review mechanisms will be used, or should national policy set clearer expectations? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Agree
a) Please provide your reasons, particularly if you disagree.	National policy should set clearer expectations. PPG/NPPF can provide a clear framework and checklist of how to determine un/viability on-site.
18) Do you agree with policy PM13 on setting local standards, including the proposal to commence s.43 of the Deregulation Act 2015? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Disagree
a) Please provide your reasons, particularly if you disagree.	The ability of LPA's to set affordable housing requirements, drawing upon relevant evidence of local need is critical to ensure identified need is met. Councils should be able to aspire to higher energy efficiency standards for new housing developments above those set in building regulations.

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Consultation Question	*Cotswold District Council Response*
19) Do you agree that the tests of soundness set out in policies PM14 and PM15 will allow for a proportionate assessment of spatial development strategies, local plans and minerals and waste plans at examination? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Agree
a) If not, please explain how this could be improved to ensure a proportionate assessment, making it clear which type of plan you are commenting on?	N/A
20) Do you have any specific comments on the content of the plan-making chapter which are not already captured by the other questions in this section?	Concerns over delivering 30 month local plans, resources required, reliance on others, lack of contingency time, concerned about dilution of safeguards that currently exist, want to ensure allocated sites are viable
	PM5: Neighbourhood Plans In part 1the term should be replaced by can. There are many examples of land already being allocated all permissioned or there is a negligible or already met local need. The cuts in government funding makes paying for housing needs assessments, viability studies, environmental assessments et cetera. Almost impossible for many local councils and some groups will focus on expediting a plan on other specific pertinent planning issues for these reasons the term 'should' adds an unrealistic level of expectation and 'can' would be more appropriate.

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Consultation Question	*Cotswold District Council Response*
Neighbourhood Priority Statements	Neighbourhood Priority Statements There has been an opportunity missed to include mention of Neighbourhood Priority Statements, established by the Levelling-Up and Regeneration Act 2023, and how local authorities should consider them in preparation of a Local Plan.
21) Do you agree with the principles set out in policy DM1? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*	*Agree*
a) Please provide your reasons, particularly if you disagree.	*Encourages consultation, places emphasis on pre-app, "requiring pre-app" requires clarification*
22) Do you agree with the policy DM2 on information requirements for planning applications? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	*Partly agree*
a) Please provide your reasons, particularly if you disagree.	*But needs clarity around wording on DM2.2 on requiring further assessment. It is unclear whether the draft wording requires Local Plan policies to explicitly mandate the submission of information, or whether it is sufficient for those policies to require an appraisal of ecological or arboricultural impacts. For example, Local Plan Policies EN7 (Trees) and*

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Consultation Question	*Cotswold District Council Response*
	EN8 (Biodiversity) set out clear, detailed requirements that need to be satisfied. However, like many development plan policies nationally, they do not specifically require a "particular assessment" (e.g. Preliminary Ecological Appraisal or Arboricultural Impact Assessment) to be submitted at validation. Under the draft NPPF wording, it is uncertain whether such assessments could still be included on a Local List. *The national information requirements do not require any ecological surveys, tree surveys, or other environmental assessments to be submitted at validation stage. If Local Lists can only require such information where the development plan explicitly calls for that specific assessment, there is a real risk that LPAs will be prevented from obtaining essential baseline information needed to determine impacts lawfully. The inclusion of clearer technical detail allwith regard to affordable housing at this stage would speed-up determination and be a more efficient use of officer time.* *In principle, national checklists are not objectionable. However, greater clarity is needed on when and how local checklists can impose additional requirements.* *Missing in Annex C: biodiversity, landscape, trees, habitat regulations assessment, BNG, design access statements, CIL.*

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Consultation Question	*Cotswold District Council Response*
23) Do you have any views on whether such a policy could be better implemented through regulations?	In principle no issues with national validation requirement, but must be robust.you three are
24) Do you agree with the principles set out in DM3? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Partly disagree
a) Please provide your reasons, particularly if you disagree.	DM3 places significantly greater emphasis on resolving issues within live applications than the current NPPF paragraph 39. This risks undermining the value and purpose of pre-application engagement, which is explicitly designed to identify and resolve issues prior to submission. The requirement to negotiate solutions during determination is likely to increase workload pressures, extend processing times, and reduce the effectiveness of published local negotiation protocols. DM3(d) may place case officers in a position where applications must be determined without full technical advice, creating a risk of unlawful or poor-quality decision-making. Statutory and internal consultees sometimes fail to meet deadlines, and the burden of risk should not fall solely on case officers. DM3(c) risks placing disproportionate weight on pre-application comments, which are necessarily preliminary, high-level and

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Consultation Question	*Cotswold District Council Response*
	non-binding. The framework should make clear that pre-application advice is not determinative and should not unduly constrain evidence-based decision-making at application stage. Need emphasis on consultees being required to respond Needs major resource overview In conflict with who statutory consultees are Diluting quality of outcomes at cost of speed/pace of delivery. If a decision is made without the input of an important consultee, it will be the LPA that will be accountable. This does not seem fair.
25) Do you agree that policy DM5 would prevent unnecessary negotiation of developer contributions, whilst also providing sufficient flexibility for development to proceed? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Agree
a) Please provide your reasons, particularly if you disagree.	N/A
26) Do you have any further comments on the likely impact of policy DM5: Development viability?	No
27) Do you have any views on how the process of modifying planning obligations under S106A, where needed once a section 106 agreement has been entered into, could be improved?	Current guidance is minimal Maybe introducing statutory time limit to process modifications and a fee, including for statutory consultees, and for non-LPA authorities,

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Consultation Question	*Cotswold District Council Response*
	such as county council section 106's where LPA's have little control over the timescales taken to agree a variation. Push for prior engagement with all parties in the NPPF.
28) Do you have any views on how the process of modifying planning obligations could be improved in advance of any legislative change, noting the government's commitment to boosting the supply of affordable housing.	Transparency, engagement, see 27.
29) Do you agree with the approach for planning conditions and obligations set out in policy DM6, especially the use of model conditions and obligations? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Is this referencing proposed national model conditions? Also seems to duplicate existing statutory instruments
30) Do you agree that policy DM7 clarifies the relationship between planning decisions and other regulatory regimes? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Partially agree
a) Please provide your reasons, particularly if you disagree.	Some regulatory regimes significantly impact the delivery of development, such as water/sewerage/resource capacity and infrastructure and this needs to be recognised. However, DM7 reaffirms that planning should not duplicate the role of other regulatory regimes. This does and will result in significant risks to delivery, e.g. lack of infrastructure and infrastructure planning by water authorities. If we are to trust that separate regimes will

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Consultation Question	*Cotswold District Council Response*
	operate effectively and align improvement plans with allocated development, they need to be made to do so.
31) Do you agree with the new intentional unauthorised development policy in policy DM8? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Partly disagree
a) Please provide your reasons, particularly if you disagree.	It is not for planning to assume intent. It has previously been established through case law that the intentions or character of an applicant is not a material consideration other than in some exceptional circumstances, and this policy blurs this line. However, if this change is made, how would a LPA prove intent?
32) Are there any specific types of harm arising from intentional unauthorised development, and any specific impacts from the proposed policy, which we should consider?	This could result in harmful neighbour/community conflict and derision and could be used as a tool for neighbour disputes.
a) If so, are there any particular additions or mitigations which we should consider?	It would only be feasible if the LPA could demonstrate that it had formally informed the owner/occupier that planning permission was required.
33) Do you agree with the new Article 4 direction policy in policy DM10? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Agree
a) Please provide your reasons, particularly if you disagree.	Agree but needs more guidance.

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Consultation Question	*Cotswold District Council Response*
34) Do you agree with the proposed approach to setting a spatial strategy in development plans? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, stronglydo you disagree*.	partly disagree
a) Please provide your reasons, particularly if you disagree.	CDC supports having a clear spatial strategy, but the proposed approaches to Richard for a rural highly constrained authority like Cotswold. The model does not reflect the districts dispersed settlement pattern extensive protected landscapes or infrastructure limitations. Too rigid for rural areas: The proposed settlement boundary led approach doesn't reflect how small Cotswold villages function or grow. Insufficient recognition of protected landscapes: The Cotswolds National Landscape requires far more locally tailored spatial planning than national policy allows. Conflicts with station density policies: High minimum densities around stations (e.g. Kemble, Moreton in Marsh) are unrealistic given landscape, heritage and infrastructure constraints. Infrastructure constraints overlooked: Rural transport limitations mean national spatial rules may force development into locations that are not sustainable in practice.
35) Do you agree with the proposed definition of settlements in the glossary? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Agree

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Consultation Question	*Cotswold District Council Response*
a) Please provide your reasons, particularly if you disagree.	Development next to undeveloped allocations for planning permission needs to be carefully considered in case the former development never comes forward.
36) Do you agree with the revised approach to the presumption in favour of sustainable development? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Agree
a) Please provide your reasons, particularly if you disagree.	But note that S5 (d) may noy result in sustainable development if it involves the redevelopment of a previously developed land for housing in an isolated location with no services or infrastructure.
37) Do you agree to the proposed approach to development within settlements? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	partially agree
a) Please provide your reasons, particularly if you disagree.	While we support clarity on development within settlements, the proposed default "approve unless adverse effects substantially outweigh benefits" approach is too permissive for rural areas like Cotswold, where many settlements have very limited services, poor public transport and high landscape/heritage sensitivity. The policy risks encouraging unsustainable growth in locations that cannot support it. • Not all settlements are sustainable: Many villages lack shops, schools, healthcare or buses. A blanket presumption for development within any settlement is inappropriate.

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Consultation Question	*Cotswold District Council Response*
	• Risk of car dependent patterns: Allowing more development in small rural settlements pushes residents into private car use, contrary to sustainable transport aims. • Landscape and heritage sensitivity: Even "in settlement" schemes can cause harm in the Cotswolds National Landscape and numerous conservation areas. • Weakens local spatial strategy: It undermines the Council's ability to prioritise growth in the most sustainable market towns. • Too blunt an approach: A single national rule cannot reflect the diversity of settlement size, function, character and capacity in rural areas. ? areas of adopted on site BNG? I know it says its not a restrictive list but AM's, LB's and NDHA's or are these covered by (c)?
38) Do you agree to the proposed approach to development outside settlements? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Partially agree
a) Please provide your reasons, particularly if you disagree.	But note that S5 (d) may noy result in sustainable development if it involves the redevelopment of a previously developed land for housing in an isolated location with no services or infrastructure
39) Do you have any views on the specific categories of development which the policy would allow to take place outside	Partially disagree

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Consultation Question	*Cotswold District Council Response*
settlements, and the associated criteria? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	
a) Please provide your reasons.	• 'Redundant or disused buildings' at HO11 (c) needs a definition as does 'truly outstanding' at (e)i. • Overly permissive list: The wide range of acceptable development types could open the door to significant growth in isolated or poorly connected rural areas. • Risk to landscape and rural character: The Cotswolds' nationally protected landscape is particularly vulnerable to cumulative small scale development outside settlements. • Transport sustainability concerns: Many locations outside settlements have no public transport, meaning almost all development would be car dependent. • Insufficient safeguards: Some categories (e.g. redevelopment of previously developed land or meeting unmet need) are too loosely defined and could allow inappropriate schemes to come forward. • Weakens settlement hierarchy: By allowing more development outside defined settlements, the policy undermines the ability to focus growth in the most sustainable locations.
40) Do you agree with the proposed approach to development around stations, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Partially agree

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Consultation Question	*Cotswold District Council Response*
a) Please provide your reasons, including any evidence that this policy would lead to adverse impacts on Gypsies and Travellers and other groups with protected characteristics.	Not sure this this is the right Q for 40? But development in and around a train station still needs to consider its context rather than being seen as a standalone consideration as the policy wording suggests.
41) Do you agree that neighbourhood plans should contain allocations to meet their identified housing requirement in order to qualify for this policy? *Strongly agree, partly agree, neither agree or disagree, partly disagree, strongly disagree*.	Strongly disagree
a) If not, please provide your reasons	This policy does not change the current approach in the NPPF. The criteria could also be interpreted as: Where a plan has either left space to build within development boundaries to support new housing, or where a plan has allocated specific sites for new homes, we could consider that it meets these criteria. Plans where development boundaries have been drawn tightly around existing developed areas are unlikely to comply. If a plan meets these criteria, CDC would continue to apply the housing policies in that Neighbourhood Plan until the plan reaches 5 years old. These plans will continue to have **full weight** applied to their housing policies in planning decisions made by CDC, unless appeal decisions indicate otherwise.

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Consultation Question	*Cotswold District Council Response*
	In all other Neighbourhood Plans, housing policies, in particular development boundaries, will become out of date and will be afforded significantly less weight in planning decisions. • the adverse effects of a housing proposal may be on the wildlife, local green spaces etc., hard to see the relevancy of how that can be outweighed by not having allocations. A proposal should seek to mitigate adverse effects independent of housing requirements. • Allocations are now very difficult for local councils to make with the government funding cut. • The Local Plan should be allocating to meet the identified requirement anyway, which puts undue requirement on the Neighbourhood Plan here. • Part b is too sweeping, effectively make a Neighbourhood Plan redundant due to not making allocations. • Overall, this would discourage neighbourhood planning. Whereas, on average they have been allocating 39 additional dwellings per plan (Gavin Parker, Impacts of Neighbourhood Planning in England). Counter-intuitive approach. As a solution, recommend removing part (b), but instead introduce a requirement for Neighbourhood Plans to undertake a Call for Sites, and an assessment of sites, taking into account the housing requirement – this process may or may not result in the allocation of suitable sites - of which this information will go to public consultation,

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Consultation Question	*Cotswold District Council Response*
	independent examination, referendum and local authority sign-off (which avoids any purposeful stifling of housing development).
42) Do you agree with the approach to planning for climate change in policy CC1? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Agree
a) Please provide your reasons, particularly if you disagree.	Proper implementation of policy CC1 will need specialist input over and beyond a qualified planning practitioner. This would be an additional resource to the LPA
43) Do you agree with the approach to mitigating climate change through planning decisions in policy CC2? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	agree nor disagree
a) If not, what additional measures could be taken to ensure climate change mitigation is given appropriate consideration?	potential conflict with building regs – another legislative regime that planning should not seek to duplicate or extend.
44) Do you agree with the approach to climate change adaptation through planning decisions in policy CC3? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	agree
a) What additional measures could be taken to ensure climate change adaptation is given appropriate consideration?	some of the measures proposed, and any additional measures, would need specialist input over and beyond that of a qualified planning practitioner and would therefore be an additional resource to the LPA

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Consultation Question	*Cotswold District Council Response*
45) Does the policy on wildfire adaptation clearly explain when such risks should be considered and how these risks should be mitigated? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	strongly disagree
a) Please provide your reasons	much more information is required for this policy to be robustly implemented by an LPA
46) How should wildfire adaptation measures be integrated with wider principles for good design, and what additional guidance would be helpful?	This requires input from a specialist
47) Do you have any other comments on actions that could be taken through national planning policy to address climate change?	building regulations are a significant tool in addressing climate change through the provision of housing and other buildings. The government should be looking at these regulations first, rather than putting the burden of delivery on the local plan process.
48) Do you agree the requirements for spatial development strategies and local plans in policy HO1 and policy HO2 are appropriate*? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Partly disagree Can generally support part 5, logical approach with some flexibility, and neighbourhood planning groups typically would like to know where they stand in the local authority's view on expected housing numbers. This would now be a requirement rather than optional as per current NPPF para 70. It would be useful to retain the last sentence of para 60 of the current NPPF: Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination,

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Consultation Question	*Cotswold District Council Response*
	unless there has been a significant change in circumstances that affects the requirement. A clear definition of what constitutes ' specialist community-based accommodation' ought to be provided for guidance.
a) Please provide your reasons, particularly if you disagree.	Cotswold District Council supports the principle in HO2 that the housing requirement must be a policy tested, deliverable figure rather than a direct adoption of the Standard Method housing need. For a district with extensive National Landscape coverage, significant heritage sensitivity, and a dispersed rural settlement pattern, it is neither realistic nor environmentally responsible to meet housing need in full. HO2 must continue to allow authorities with substantial constraints to set a lower housing requirement where justified by evidence, and to ensure that the plan remains sound, deliverable and consistent with statutory landscape and environmental designations.
49) Is further guidance required on assessing the needs of different groups, including older people, disabled people, and those who require social and affordable housing? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Strongly agree
a) If so, what elements should this guidance cover?	This ought to take account of and incorporate definitions under the Supported Housing Regulatory Oversight Act (SHROA) as much needed types of accommodation are (in the experience of local

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Consultation Question	*Cotswold District Council Response*
	authorities in Gloucestershire) are not brought forwards as part of a new development, or if much-needed specialist accommodation (e.g for people fleeing domestic abuse, etc) is delivered, it is typically speculative and unplanned in nature. This leads to poor and disjointed outcomes for the residents of such schemes. It could be helpful to name some indicators for Affordable Housing need. For example, the Local authority affordable housing register is a guide to affordable housing demand/need in an area but it is not given any weight in Planning terms. A problem often encountered is that a local housing needs survey (parish level) identifies much lower demand/need numbers than are already contained on the Affordable Housing Register.
50) Do you agree with the approach to incorporating relevant policies of Planning Policy for Traveller Sites within this chapter? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Agree
a) Please provide your reasons, particularly if you disagree.	• Simplifies national policy: Having all relevant policies in one place makes the Framework clearer and easier to navigate. • Reduces duplication: Removing a separate policy document avoids overlap and improves consistency.

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Consultation Question	*Cotswold District Council Response*
	• Supports more integrated planning: Embedding traveller site considerations into wider housing and spatial strategy policies helps ensure needs are assessed alongside other groups. • Still allows local application: The national principles can be interpreted at a local level, ensuring CDC can reflect its rural context, constraints and evidence base.
51) Is further guidance needed on how authorities should assess the need for traveller sites and set requirement figures? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Agree Clearer national guidance would provide much needed consistency and support LPAs in preparing robust assessments. This is particularly important for rural and constrained areas like Cotswold, where baseline data is limited and needs can be complex to evidence.
a) If so, what are the key principles this guidance should establish?	• Improves consistency: Standardised guidance would reduce variation in assessment quality between authorities. • Helps evidence gathering: Traveller needs can be difficult to quantify; clearer methods would improve accuracy and transparency. • Supports strategic planning: Stronger guidance would help align needs assessment across wider housing and spatial strategies. • Reduces challenge at examination: A clearer national framework would help ensure assessments are robust, defensible and easier for Inspectors to apply.

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Consultation Question	*Cotswold District Council Response*
52) Do you agree the new Annex D to the draft Framework is sufficiently clear on how local planning authorities should set the appropriate buffer for their local plan 5-year housing land supply? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Partly disagree
a) Please provide your reasons, particularly if you disagree.	Annex D improves clarity on the calculation process, but the guidance on selecting the appropriate buffer remains too generic and leaves room for interpretation, especially for rural authorities with fluctuating delivery patterns. • Still too much ambiguity: The criteria for choosing different buffer levels are not specific enough for varied rural contexts. • Doesn't reflect rural delivery volatility: Small sites dominate delivery in Cotswold, making yeartoyear supply more variable than Annex D implies. • Risk of inconsistent interpretation: Without tighter national direction, different Inspectors may apply buffer expectations differently. • Limited support for constrained authorities: Areas with environmental and infrastructure limits need clearer guidance on what constitutes a "reasonable" buffer.
53) Do you agree the new Annex D to the draft Framework is sufficiently clear on the wider procedural elements of 5-year housing land supply, the Housing Delivery Test and how they	Partly disagree

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Consultation Question	*Cotswold District Council Response*
relate to decision-making? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	
a) Please provide your reasons, particularly if you disagree.	Annex D is clearer than before, but important procedural elements remain open to interpretation. For a rural authority with variable delivery patterns and heavy environmental constraints, the guidance still lacks the precision needed to give confidence in how supply and the Housing Delivery Test will be applied in practice. • Still too much ambiguity: Key steps—such as how supply should be validated and how different components interact—could be set out more explicitly. • Doesn't reflect rural delivery realities: Small-site dominated housing markets create volatility that Annex D doesn't fully account for. • Risk of inconsistent interpretation: Without stronger wording, different LPAs and Inspectors may apply the rules differently. • Unclear links to decisionmaking: The relationship between supply calculations, HDT outcomes and the presumption in favour of development still isn't set out in a simple, unambiguous way.
54) Do you agree the requirements to establish a 5 year supply of deliverable traveller sites and monitor delivery are sufficiently clear? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Partly disagree The principle is sound, but the requirements in Annex D lack the clarity and detail needed for practical implementation, particularly for rural authorities where identifying and delivering suitable sites is challenging.

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Consultation Question	*Cotswold District Council Response*
	• Clarity still limited: Annex D sets out headline expectations but does not provide enough methodological guidance on demonstrating a reliable 5year supply for traveller sites. • Rural delivery challenges not addressed: In areas like Cotswold, environmental and land availability constraints make it difficult to identify deliverable sites, and clearer criteria would reduce uncertainty. • Monitoring expectations underdeveloped: The Annex does not fully explain how delivery should be tracked, reported or validated, which risks inconsistency across authorities. • Risk of dispute at examination: Without tighter national direction, assessments may be vulnerable to challenge, undermining plan soundness.
55) Do you agree the plan-making requirements, for both local plans and spatial development strategies, in relation to large scale residential and mixed-use development are sufficiently clear? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	No Q on HO2 or HO3? HO4 - Agree
a) Please provide your reasons, particularly if you disagree.	Any comments on HO4?
56) Do you agree our proposed changes to the definition of designated rural areas will better support rural social and affordable housing? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Agree. The District is predominantly rural, with many small settlements facing acute affordability pressures and limited opportunities to deliver social and affordable housing.

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Consultation Question	*Cotswold District Council Response*
	Broadening the definition will enable more villages within Cotswold to benefit from lower affordable housing thresholds, rural exception site policies, and greater flexibility to secure genuinely affordable homes for local people. The proposal is therefore a positive reform for rural districts such as Cotswold. Allowing local planning authorities to set their own lower thresholds for affordable housing in designated rural areas will better support the delivery of rural social and affordable housing.
57) Do you agree with our proposals to ask authorities to set out the proportion of new housing that should be delivered to M4(2) and M4(3) standards? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Agree But central govt should lead in mandating the delivery of M4(2) and M4(3) homes across all tenures to help support our ageing population to remain independently healthy at home for longer. The English Housing Survey finds that the level of accessibility in existing housing stock is very low, contributing to poor health outcomes and a lack of housing choice for disabled and frail residents.
58) Do you agree 40% of new housing delivered to M4(2) standards over the plan period is the right minimum proportion? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Partly disagree f have a long-term illness or disability, which to some degree, is likely to correlate with requiring accessible homes.

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Consultation Question	*Cotswold District Council Response*
a) Please provide your reasons, and would you support an alternative minimum percentage requirement?	*T*his percentage could be increased as meeting M4(2) is not a costly requirement and provides flexibility for the future The proportion of M4(2) homes to be delivered on sites over 100 over the the Plan Period ought to be closer to 100%. It isn't costly and will futureproof the housing stock going forwards. 40% doesn't account for differing levels of (theoretical) levels of need across tenures. The English Housing Survey has determined that 61% of social renters This could be increased to 50% AH
59) Do you agree the proposals to support the needs of different groups, through requiring authorities to identify sites or set requirements for parts of allocated sites are proportionate? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Agree
a) Please provide your reasons, particularly if you disagree.	This is largely a logical proposal and will aim to ensure that the different needs of multiple groups are accounted for across the duration of the local plan in a consistent and coordinated way, rather than being speculative (development led) or not delivered at all for some groups.
60) Do you agree with our proposals to ask authorities to set out requirements for a broader mix of tenures to be provided on sites	Strongly agree

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Consultation Question	*Cotswold District Council Response*
of 150 homes or more? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	
a) Please provide your reasons and indicate if an alternative site size threshold would be preferable?	This would help ensure balanced communities, avoiding mono tenure/type development. A wide mix of tenures helps to diversify new home offers, potentially supporting SMEs as well as a range of product types, creating a mixed and balanced communities. The threshold of 150 units would appear to be reasonable.
61) Do you agree with proposals for authorities to allocate land to accommodate 10% of the housing requirement on sites of between 1 and 2.5 hectares? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	HO6 - 10% for what? That listed in HO5?
a) Please provide your reasons	This could be difficult is some areas – e.g National Landscape areas and is made more problematic if a 5% cap on rural exception sites is introduced (which it should not – see Q75)
62) Are any changes to policy HO7 needed in order to ensure that substantial weight is given to meeting relevant needs?	Agree Consideration should be given to explicitly adding the local authority affordable housing homeseeker register as an indicator of housing need.
63) Do you agree that proposals to add military affordable housing to the definition of affordable housing, and allow military	Partly agree

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Consultation Question	*Cotswold District Council Response*
housing to be delivered as part of affordable housing requirements, will successfully enable the provision of military homes? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	
a) Please provide your reasons, particularly if you disagree.	This needs to be introduced and implemented in a way that does not introduce military homes at the expense of social and affordable homes. Would this not eat into housing needs for the local community and be ringfenced for the military thereby lessening provision for local needs? Whilst the proposals to add military affordable housing to the affordable housing definition appear agreeable, central govt ought to be mindful that allowing this to be delivered as part of the overall affordable housing requirements could ultimately disadvantage households already on the waiting lists. Good quality accommodation is required by everyone and allocation or ring-fencing, should be done only in consultation with the local authority and taking all local needs and priorities into consideration.
64) Do you agree flexibility relating to the size of market homes provided will better enable developments providing affordable housing? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Neither agree nor disagree
a) Please provide your reasons, particularly if you disagree.	We want mixed communities across developments not one rule for affordable and another for market housing.

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Consultation Question	*Cotswold District Council Response*
	In the experience of Gloucestershire local authorities where developments are delivered that include larger market homes, a proportionately equivalent size is not provided for the affordable housing. In other words, developers can seek house types that are commensurate with maximum profit.
65) Would requiring a minimum proportion of social rent, unless otherwise specified in development plans, support the delivery of greater number of social rent homes? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Agree
a) If so, what would be an appropriate minimum proportion and development size threshold taking into account development viability?	In theory, requiring a minimum proportion of social rent (unless a higher proportion is set out within Local Plans) could help to boost the overall delivery of social rented homes- a laudable and hugely positive outcome. However, the Government should be mindful that (notwithstanding the proposed changes to viability within this consultation) developers may seek to reduce overall affordable housing contributions, or claim that sites are unviable, due to a set percentage of social rented homes being provided, especially in areas with marginal viability. Nevertheless, if the Government is serious about boosting the supply and delivery of social rented homes, then, provided this 'minimum proportion' is carefully calculated and implemented, this proposal sounds like a good start.

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Consultation Question	*Cotswold District Council Response*
66) Are changes to planning policy needed to ensure that affordable temporary accommodation, such as stepping stone housing, is appropriately supported, including flexibilities around space standards?	Partly disagree
a) If so, what changes would be beneficial?	Whilst we appreciate the significant housing pressures being faced by local authorities nationwide, including locally in Gloucestershire, the Government should focus their efforts on boosting the level of affordable housing available in perpetuity. Flexibility around space standards, whilst perhaps well-intentioned, is likely to lead to developers using this potential loophole in planning policy to develop low—quality, overly cramped homes to meet the overwhelming need for social housing. This does not address the root cause of the housing issues faced either locally or nationally, rather, addressing a symptom. Thus, as stated above, the Government should focus on introducing space standards (rather than revoking them to enable development of a potentially dubious quality) and delivering affordable housing in perpetuity to meet housing need both now, and well into the future
67) Do you agree that applicants should have discretion to deliver social and affordable housing requirements via cash payments in lieu of on-site delivery on medium sites? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Disagree. Some LA's do not have the resources or expertise to deliver housing. Applicants should deliver the affordable housing as part of the development as this provides consistency of design and delivery (promotes tenure blind approach). Cash payments should only be used in exceptional circumstances and at the discretion of the LPA.

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Consultation Question	*Cotswold District Council Response*
a) If so, would it be desirable to limit the circumstances in which cash contributions in lieu of on-site delivery can be provided – for example, should it not be permitted on land released from the Green Belt where the Golden Rules apply? Please explain your answer.	Yes it would be desirable -. Some LA's do not have the resources or expertise to deliver housing. Applicants should deliver the affordable housing as part of the development as this provides consistency of design and delivery (promotes tenure blind approach) and promotes balanced communities. Cash payments should only be used in exceptional circumstances and at the discretion of the LPA Whilst the difficulties faced by SME's are significant, helping SME's and other developers by offering the discretion to provide affordable housing via commuted sums in lieu of on-site delivery will ultimately undermine the Government's ambition of delivering affordable housing at a 'once in a generation' scale. Deferring the delivery of on-site affordable housing leaves local authorities in a position where they may struggle to spend or commit receipts due to fierce competition for land, or due to high housing costs (where acquisitions are sought). Whereas on-site delivery helps to meet immediate affordable housing need and create mixed and balanced communities. The Government should therefore explore other options to support SME's and development on smaller sites.
b) If you do not believe applicants should have blanket discretion to discharge social and affordable housing requirements through commuted sums, do you think cash	Some LA's do not have the resources or expertise to deliver housing. Applicants should deliver the affordable housing as part of the

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Consultation Question	*Cotswold District Council Response*
contributions in lieu of on-site delivery should be permitted in certain circumstances – for example where it could be evidenced that onsite delivery would prevent a scheme from being delivered? Please explain your answer	development as this provides consistency of design and delivery (promotes tenure blind approach). Cash payments should only be used in exceptional circumstances and only at the discretion of the LPA. However, affordable housing contributions may be sought off-site in certain circumstances. For example, where an applicant is seeking to incorporate a listed building into the application, this may make the long-term management of potential on-site affordable housing costly and technically difficult. Equally, if, after reasonable endeavours have been exercised by the developer to secure an registered provider partner without success (to the satisfaction of the local authority), a commuted sum in lieu of on-site affordable housing should be permitted.
68) What risks and benefits would you expect this policy to have? Please explain your answer. The government is particularly interested in views on the potential impact on SME housing delivery, overall housing delivery, land values, build out rates, overall social and affordable housing delivery, and Registered Providers (including SME providers).	A Risk is that Developers will prefer paying a commuted sum rather than delivering policy compliant affordable housing numbers. The Local Authority may not have the expertise of available land to then use the commuted sum money to deliver affordable homes elsewhere. This could lead to a further reduction in the number of affordable homes being delivered whilst developers continue to deliver open market homes. The Economies of Scale delivering the Affordable Homes contemporaneously with the open market home swill be most and the delivery of the affordable homes will be more expensive.

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Consultation Question	*Cotswold District Council Response*
	If implemented as proposed, this policy would result in an overall decline of affordable housing delivery, at a time when the Government has 1.3 million households on housing registers nationwide, and the numbers of households in temporary accommodation is at record levels. Whilst this may support SME developers, and help to boost overall housing delivery, this should not come at the cost of delivering much-needed affordable housing for those in the greatest need. Notably, the Government's recent research on the relationship between build-out rates and the presence of affordable housing on-site broadly indicates that the presence of affordable housing on-site (with associated triggers to prevent the completion of development) generally helps to accelerate housing delivery. It therefore seems counterproductive to give SME developers a blanket option to revert to commuted sums in lieu of on-site delivery if the Government wishes to achieve it's stated aim of delivering 1.5 million homes over the current Parliamentary term. Equally, this policy is likely to have a detrimental effect on smaller, SME-level registered providers, many of which enable the delivery of affordable housing on small sites, who remain under considerable pressure given their financial resources, regulatory requirements and other external factors.
69) What guidance or wider changes would be needed to enable Local Planning Authorities to spend commuted sums more effectively and more quickly? Please explain your answer.	*F*urther guidance is required to enable LPA's to spend commuted sums more effectively. Local Authorities will often seek to save commuted sum contributions, where possible, to contribute to longer-

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Consultation Question	*Cotswold District Council Response*
	term strategic objectives, rather than seeking to spend these monies immediately. Notwithstanding this, the Government could more widely publish IFS figures around commuted sum monies held by local authorities, and require local authorities to indicate what they intend to spend these monies on, to aid public transparency. In terms of spending commuted sums more quickly, the raising public awareness regarding the publication of IFS figures may aid local authorities in spending commuted sums more quickly- although the Government should be aware that this may be to the detriment of longer-term strategic objectives pursued by local authorities (e.g. saving monies for a land acquisition).
70) Would further guidance be helpful in supporting authorities to calculate the appropriate value of cash contributions in lieu?	The focus should be on getting developers to deliver policy compliant affordable housing numbers contemporaneously with the open market housing rather than putting the onus on LA delivery via commuted sums. This may be helpful for the purposes of providing clarity to local authorities and developers about how commuted sums will be calculated, which, owing to lack of capacity and the current status of many Local Plans, may remain unclear. Any guidance/agreed approach to calculating affordable housing commuted sums should be made in agreement with local authorities.
a) If so, what elements and principles should this guidance set out? Please explain your answer. For example, guidance could make clear that contributions in lieu should be an amount which	

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is the equivalent value of providing affordable housing on site, based on a comparison of the Gross Development Value of the proposed scheme with the Gross Development Value of the scheme assuming affordable housing was provided onsite.	This may be helpful for the purposes of providing clarity to local authorities and developers about how commuted sums will be calculated, which, owing to lack of capacity and the current status of many Local Plans, may remain unclear. Any guidance/agreed approach to calculating affordable housing commuted sums should be made in agreement with local authorities. Whilst not wedded to any one model, the Government should ensure that whatever guidance is chosen should be agreed in consultation with local authorities. It should be evidence-based and (if seeking to reflect gross development value), should ensure that this is supported by an independent RICS valuation, paid for by the applicant and commissioned by the local authority
71) Do you support proposals to enable off site delivery where affordable housing delivery can be optimised to produce better outcomes in terms of quality or quantity? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Partly disagree
a) Please provide your reasons, particularly if you disagree.	Developing sites via LA's using commuted sum monies is highly likely to be ;less efficient than developers delivering them alongside open market homes. LA's will also struggle to find available land to deliver, having allowed 100% open market development on land used by the developer to provide the commuted sum. In a similar vein to 67b, above, there may be certain limited circumstances where off-site contributions, (or off-site delivery) are

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	preferable owing to specific site characteristics (e.g. incorporating listed buildings, or lack of RP appetite on a certain site). In almost all circumstances, policy compliant on-site delivery should be prioritized by the local authority and should be the starting point for development proposals. However, where the circumstances above are relevant, off-site delivery may be agreed in negotiation with the local authority, with strong safeguards put in place to ensure that the affordable housing delivered on the other selected site produces better affordable housing outcomes
72) Do you agree the with the criteria set out regarding the locations of specialist housing for older people? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Partly agree
a) Please provide your reasons, particularly if you disagree.	Whilst the focus on ensuring that housing for older people and other forms of specialist provision are provided in appropriate locations is welcomed, further focus needs to be placed on the design of housing for older people, (in terms of access to green open space, and how internal design can be optimised in light of best practice). Moreover, it would be helpful to define 'specialist community-based accommodation', and to ensure that this accommodation is also built to appropriate M4(2) and/or M4(3) accessibility standards, dependent on the client group in question. Whilst this may be seen as a matter for a detailed planning consent, this guidance is silent on how technology and assistive aids could be used in schemes for older people and other specialist groups to help them maintain their independence- this feels like a missed opportunity to support system-wide change to the delivery of specialist accommodation

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Consultation Question	*Cotswold District Council Response*
73) Do you agree with the criteria set out regarding the locations of community-based specialist accommodation, including changes to the glossary? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Agree
a) Please provide your reasons, particularly if you disagree.	Thought needs to be given to any vulnerable community in the existing locality.
74) Do you agree with the criteria set out regarding the locations of purpose-built student accommodation and large-scale shared living accommodation, including changes to the glossary? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Agree
a) Please provide your reasons, particularly if you disagree.	
75) Do you agree the proposals provide adequate additional support for rural exception sites? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Strongly Disagree
a) Please provide your reasons, including what other changes may be needed to increase their uptake?	The introduction of 5% CAP on the size of an exception site in relation to the size of the existing settlement (HO10. Para 2) should not be implemented and should be removed from the new nppf as it will reduce affordable housing delivery. This CAP would mean, for example that a 250 house existing settlement would have a cap of 12 houses in an exception site –this

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	would inevitably have challenges with viability and lack of RP support – and likely mean that no houses would be provided as affordable housing exception sites in this type of scenario. **This would particularly impact Rural Affordable Housing delivery and lead to many opportunities for rural affordable housing delivery being stopped**. It should be left to the LPA and local communities to determine the appropriate sizes of exception site in individual locations. For example, an exception site going ahead of >5% could help ensure the vitality and sustainability of local services in the settlement (e.g pub, shop, school) - surely it would be counter-productive to stifle such opportunities with an arbitrary generic CAP. If no such cap is proposed for open market housing, then it shouldn't be imposed for affordable.
76) Do you agree with proposals to remove First Homes exception sites as a discrete form of exception site? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Agree
a) Please provide your reasons, particularly if you disagree.	First homes as a tenure type within a development of other tenures is fine but not as a discrete sole-tenure exception site.
77) Do you agree proposals for a benchmark land value for rural exception sites will help to bring forward more rural affordable	Agree

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Consultation Question	*Cotswold District Council Response*
homes? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	
a) If so, which approach and value as set out in the narrative for policy HO10 of the consultation document is the most beneficial for government to set out?	£15k per plot may be a better figure for incentivising landowners to make land available as Affordable Housing Exception sites, especially in Rural areas.
78) Do you agree the proposals to set out requirements for traveller sites at policy HO12 adequately capture relevant aspects from Planning Policy for Traveller Sites, whilst ensuring fair treatment for traveller sites in the planning system? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Agree?
79) Please provide your reasons, particularly if you disagree.	
80) Do you agree the proposals in policy HO13 will help to ensure development proposals are built out in a reasonable period? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Disagree
a) Please provide your reasons, particularly if you disagree.	The policy has no teeth. Developers are likely to resist a shorter timescale and the LPA will be on the back foot trying to evidence that a shorter timescale will not threaten implementation or viability.
81) Do you agree the requirements to take a flexible approach to the consenting framework for large scale residential and mixed-	neither agree or disagree

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Consultation Question	*Cotswold District Council Response*
use development is sufficient to ensure the opportunities of large scale development are supported? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	
a) Please provide your reasons, particularly if you disagree.	As above, the policy has no teeth
82) Are any more specific approaches or definitions needed to support the delivery of very large (super strategic) sites, including new towns? *Yes, no*	yes
a) Please provide your reasons.	Methods to avoid/stop developers controlling buildout rates to maximise profit.
83) Do you agree with the proposed changes to the Housing Delivery Test rule book? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	?
a) Please provide your reasons, particularly if you disagree.	
84) Do you agree that more emphasis should be placed on relevant national strategies and the need for flexibility in planning for economic growth, as drafted in policy E1? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	neither agree nor disagree
a) Please provide your reasons, particularly if you disagree.	JW The focus on relevant strategies and facilitating development to meet the needs of a modern economy is welcome, but risks being undermined by clause 2 – a strategy driven approach needs to have

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Consultation Question	*Cotswold District Council Response*
	teeth, otherwise the engine rooms for growth, such as clusters and campus facilities may be repurposed to lower opportunity uses. Not sure what remit the LPA has to implement E11b
85) Do you agree with the approach to meeting the need for business land and premises in policy E2? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	agree
a) Please provide your reasons, particularly if you disagree.	
86) Do you agree with the proposed new decision-making policy supporting freight and logistics development in policy E3? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	agree
a) Please provide your reasons, particularly if you disagree.	
87) Do you agree with the approach to rural business development in policy E4? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	agree
a) Please provide your reasons, particularly if you disagree.	With regard to E4 1b, what is the definition of other land-based businesses?
88) Do you agree with the proposed changes to policy for planning for town centres? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	agree ?

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Consultation Question	*Cotswold District Council Response*
a) Please provide your reasons, particularly if you disagree.	
89) Do you agree with the approach to development in town centres in policy TC2? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Agree?
a) If not, please explain how you would achieve this aim differently?	
90) What impacts, if any, have you observed on the operation of planning policy for town centres since the introduction of Use class E?	It hasn't protected retail uses in town and local centres
91) Do you believe the sequential test in policy TC3 should be retained? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	agree
a) Please provide your reasons, particularly if you disagree.	
92) Do you agree with the approach to town centre impact assessments in policy TC4? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Partially agree
a) Please provide your reasons, particularly if you disagree.	the default threshold of 2500 m^2 is a large rural area.
93) Do you agree that the updated policies provide clearer and stronger support for the rollout of 5G and gigabit broadband?	strongly disagree

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Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	
a) Please provide your reasons, particularly if you disagree.	the policy is confusing. LPA's do not have the expertise to determine the cumulative exposure of non-ionising radiation. CO1 1a and 2 seem at odds with one another and do not provide enough clarity to allow the local planning authority to scrutinise a proposal. Telecommunications infrastructure policies require a lot more clarity from government. There is a requirement in the validation requirements for an ICNIRP statement to be submitted confirming the proposals are within guidelines. I agree though, this is very technical and we would simply need to trust that the self-certification is correct.
94) Do you agree the requirements for minimising visual impact and reusing existing structures are practical for applicants and local planning authorities? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	agree
a) Please provide your reasons, particularly if you disagree.	It should but .2 of the policy somewhat undermines this approach.
95) Do you agree the supporting information requirements are proportionate and sufficient without creating unnecessary burdens? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	agree
a) Please provide your reasons, particularly if you disagree.	but this information is rarely considered sufficient justification by local residents.

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Consultation Question	*Cotswold District Council Response*
96) Do you agree with the approach to planning for energy and water infrastructure in policy W1? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	agree
a) Please provide your reasons, particularly if you disagree, what alternative approach would you suggest?	the onus needs to be on utility providers, regulators and network operators to pragmatically address allocations in development plans. At present there is no requirement for them to do so and in many cases, particularly with water companies, this will detrimentally impact housing delivery. By way of example Thames water have informed us that they will only consider upgrades to infrastructure once planning permission has been granted for development and that this process will on average take considerably longer to agree and implement than the lifetime of the planning permission.
97) Do you agree with the amendments to current Framework policy on planning for renewable and low-carbon energy development and electricity network infrastructure in policy W2? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	agree
a) Please provide your reasons, particularly if you disagree.	But, this is a specialised area which is unsupported by many LPA's. With regard to renewable electricity, significant work needs to be done to improve the ability for this to connect to the National Grid, which is outside of the control of the LPA. If this policy is to succeed, the national infrastructure grid has to be capable of supporting it. It is not at present.

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Consultation Question	*Cotswold District Council Response*
98) Do you agree with the proposed approach to supporting development for renewable and low carbon development and electricity network infrastructure in policy W3? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	agree
a) Please provide your reasons, particularly if you disagree, and any changes you would make to improve the policy.	but comments made in relation to 97 a still apply stop
99) Do you agree with the proposed approach to supporting development for water infrastructure in policy W4? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	agree
a) Please provide your reasons, particularly if you disagree.	but what is the reason why these upgrades are so few and far between.
100) Do you agree with the proposed prohibition on identifying new coal sites in policy M1, and to the removal of coal from the list of minerals of national and local importance? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	neither agree nor disagree
a) Please provide your reasons, particularly if you disagree.	
101) Do you agree with how policy M1 sets out how the development plan should consider oil and gas? *Strongly agree,*	neither agree nor disagree

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Consultation Question	***Cotswold District Council Response***
partly agree, neither agree nor disagree, partly disagree, strongly disagree.	
a) Please provide your reasons, particularly if you disagree.	
102) Do you agree with the proposed addition of critical and growth minerals to the glossary definition of 'minerals of national and local importance'? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	neither agree nor disagree
a) Please provide your reasons, particularly if you disagree.	
103) Do you agree criteria b of policy M2 strikes the right balance between preventing minerals sterilisation and facilitating non minerals development? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	neither agree nor disagree
a) Please provide your reasons, particularly if you disagree.	
104) Do you agree policy M3 appropriately reflects the importance of critical and growth minerals? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	neither agree nor disagree
a)	**Please provide your reasons, particularly if you disagree.**
105) Do you agree with the exclusion of development involving onshore oil and gas extraction from policy M3? *Strongly*	neither agree nor disagree

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Consultation Question	*Cotswold District Council Response*
agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	
106) Please provide your reasons, particularly if you disagree.	
107) Do you agree policy M4 sufficiently addresses the impacts of mineral development, noting that other national decision-making policies will also apply? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	neither agree nor disagree
108) Please provide your reasons, particularly if you disagree.	
109) Do you agree with approach to coal, oil and gas in policy M5? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	neither agree nor disagree
a) Please provide your reasons, particularly if you disagree.	
110) Are there any other exceptional circumstances in which coal extraction should be permitted? Yes/No	?
111) If yes, please outline the exceptional circumstances in which you think coal extraction should be permitted.	
112) Do you agree policy M6 strikes the right balance between preventing the sterilisation of minerals reserves and minerals-related activities, and facilitating non-minerals	neither agree nor disagree

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Consultation Question	*Cotswold District Council Response*
development? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	
a) Please provide your reasons, particularly if you disagree.	
113) Does policy M6 provide sufficient clarity on the role of Minerals Consultation Areas? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	neither agree nor disagree
a) Please provide your reasons, particularly if you disagree.	
114) Do you agree policy L1 provides clear guidance on how Local Plans should be prepared to promote the efficient use of land? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Agree?
115) If not, what further guidance is needed?	
116) Do you agree policy L2 provides clear guidance on how development proposals should be assessed to ensure efficient use of land? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	agree?
a) Please provide your reasons, particularly if you disagree.	
117) Do you agree policy L2 identifies appropriate typologies of development to support intensification? *Strongly*	agree?

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Consultation Question	*Cotswold District Council Response*
agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	
a) If not, what typologies should be added or removed and why?	?
118) Do you agree the high-level design principles provided in policy L2(d) appropriate for national policy? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	disagree
a) Please provide your reasons, particularly if you disagree.	it is not always appropriate to fill gaps in existing roof lines, particularly in conservation areas or adjoining listed buildings.
119) Do you agree policy L2 (d)(i) achieves its intent to enable appropriate development that may differ from the existing street scene, particularly in cases such as corner plot redevelopment and upwards extensions. *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	disagree
a) Please provide your reasons, particularly if you disagree.	this type of national policy may not be appropriate to many local and rural contexts.
120) Do you agree with the proposed safeguards in policy L2 that allow development in residential curtilages? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	neither agree nor disagree

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Consultation Question	*Cotswold District Council Response*
a) Please provide your reasons, particularly if you disagree.	twice the footprint of the existing building on the site could be significant and out of context. It would be better if this element of the policy was removed
121) Do you agree policy L3 provides clear guidance on achieving appropriate densities for residential and mixed-use schemes? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	disagree
a) If not, please explain how guidance could be clearer?	it is appropriate that the existing character of an area should be given significant weight rather than just being taken into account. Any new development needs to assimilate itself into its location and not jar, particularly if the development process is attempting to build communities. At present the wording of L3 2 suggests that the existing character of an area can be easily disregarded.
122) Do you agree with the minimum density requirements set out within policy L3? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	neither agree nor disagree
a) Please provide your reasons, particularly if you disagree.	minimum densities still need to have consideration to the local context and character. High density development near railway stations could just create commuter development which provides little additional value to the local community.
b) Could these minimum density requirements lead to adverse impacts on Gypsies and Travellers and other groups with protected	?

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Consultation Question	*Cotswold District Council Response*
characteristics? Please provide your reasons, including any evidence	
123) Do you agree that using dwellings per hectare is an appropriate metric for setting minimum density requirements? Additionally, is our definition of 'net developable area' within the NPPF suitable for this policy? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	agree
a) Please provide your reasons, particularly if you disagree.	
124) Do you agree with the proposed definition of a 'well-connected' station used to help set higher minimum density standards in targeted growth locations? In particular, are the parameters we're using for the number of Travel to Work Areas and service frequency appropriate for defining a 'well-connected' station? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	agree Note: The well-connected station footnote would exclude Moreton in Marsh because that does not have four trains per hour overall or two trains per hour in any one direction.
a) Please provide your reasons and preferred alternatives.	
125) Are there other types of location (such as urban core, or other types of public transport node) where minimum density standards should be set nationally? *Yes/No*	?
a) If so, how should these locations be defined in a clear and unambiguous way and what should these density standards be?	?

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Consultation Question	*Cotswold District Council Response*
126) Should we define a specific range of residential densities for land around stations classified as 'well-connected'?	No but the policy could suggest the level of density currently proposed as long as this was subject to other reasonable place making considerations
127) If so, what should that range be, and which locations should it apply to?	
128) Do you agree policy L4 provides clear high-level guidance on good design for residential extensions? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	disagree
129) Please provide your reasons, particularly if you disagree.	the word height should be added to scale and form and materials. Also, does footnote 46 not cause implications for houses that have already been subject to large previous extensions?
130) Do you agree that policy GB1 provides appropriate criteria for establishing new Green Belts? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	?
131) Please provide your reasons, particularly if you disagree.	
132) Do you agree policy GB2 gives sufficient detail on the expected roles spatial development strategies and local plans play in assessing Green belt land? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	?

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Consultation Question	*Cotswold District Council Response*
a) Please provide your reasons, particularly if you disagree.	
133) Do you agree with proposals to better enable development opportunities around suitable stations to be brought forward? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	neither agree nor disagree
a) Please provide your reasons, particularly if you disagree.	consideration needs to be given to noise, particle and other pollution in close proximity to train stations and lines.
134) Do you agree the expectations set out in policy GB5 are appropriate and deliverable in Local Plans? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	agree Same approach as current NPPF, which is supportable.
135) Please provide your reasons, particularly if you disagree.	
136) Do you agree policies GB6 and GB7 set out appropriate tests for considering development on Green Belt land? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	agree
a) Please provide your reasons, particularly if you disagree.	
137) Do you agree policy GB7(1h) successfully targets appropriate development types and locations in the Green Belt, including that it applies only to housing and mixed-use	neither agree nor disagree

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Consultation Question	*Cotswold District Council Response*
development capable of meeting the density requirements in chapter 12? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	
138) Please provide your reasons, including any evidence that this policy would lead to adverse impacts on Gypsies and Travellers.	?
139) Do you agree that site-specific viability assessment should be permitted on development proposals subject to the Golden Rules in these three circumstances? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Partly agree
a) Please provide your reasons, particularly if you disagree.	Subject to the Government introducing the new process linked with viability and the Golden Rules, the proposals set out in GB8 sounds sensible, however, the Government should be mindful of developers seeking to reduce affordable housing contributions through these mechanisms, especially on c), where developers may seek to pursue one option (at outline) before then pursuing a different development model at reserved matters to subsequently trigger a viability assessment and seek to reduce the delivery of on-site affordable housing
140) With regards to previously developed land, are there further changes to policy or guidance that could be made to help ensure site-specific viability assessments are used only for genuinely previously developed land, and not predominantly greenfield sites?	?

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Consultation Question	*Cotswold District Council Response*
141) Do you agree with setting an affordable housing 'floor' for schemes subject to the Golden Rules accompanied by a viability assessment subject to the terms set out? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	agreed but it would be simpler to set it at 50%
142) Please explain your answer, including your view on the appropriate approach to setting a 'floor', and the right level for this?	the easiest approach is to set it at 50%, as this will not be far off the +15% suggested in paragraph ii Do not agree with a cap of 50% for affordable housing –rather than a floor and a cap why not just say that in these circumstances 50% Affordable Housing is required as a minimum. Of the two options proposed, the Government should look to implement a mix of a) and b). To boost the delivery of social rent, a set proportion of social rent should be included on the site, however, to ensure that mixed and balanced communities are generated, the levels should be set in line with local circumstances, mirroring local plan requirements.
143) Do you agree with local planning authorities testing viability at the plan-making stage using a standardised Benchmark Land Values scenario of 10 times Existing Use Value for greenfield, Green Belt land? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	agree
a)	

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Consultation Question	*Cotswold District Council Response*
144) Do you have any other comments on the use of nationally standardised Benchmark Land Values for local planning authorities to test viability at the plan-making stage?	The use of BLV's can be a good mechanism for 'controlling' Hope Value from Landowners/Developers who hold on the suitable sites in the 'hope' that they will get a windfall land value from a planning gain for residential over existing use. The risk is that setting BLV's too low will stifle sites being made available for development. On balance it is considered better to implement BLV's but with the flexibility to reassess their success in promoting development later down the line.
145) Do you agree that proposed changes to the grey belt definition will improve the operability of the grey belt definition, without undermining the general protections given to other footnote 7 areas? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	disagree? I can't find the relevant footnote 7?
a) Please provide your reasons, particularly if you disagree.	disagree that only a b and d of policy GB our relevant to designating greenbelt is grey belt
146) Do you agree that policy DP1 provides sufficient clarity on how development plans should deliver high quality design and placemaking outcomes? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	agree
a) Please provide your reasons, particularly if you disagree.	N/A

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Consultation Question	*Cotswold District Council Response*
147) Do you agree with the approach to design tools set out in policy DP2? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	agree
a) Please provide your reasons, particularly if you disagree.	N/A
148) Do you agree policy DP3 clearly set out principles for development proposals to respond to their context and create well-designed places? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Partly agree
a) Please provide your reasons, particularly if you disagree.	Whilst the continued focus on promoting social interaction and promoting mixed, vibrant and integrated communities is welcomed, further additions should be made to Policy DP3 to require that homes and buildings (rather than just public space) are accessible and inclusive. This would tie in with the previously suggested approach of mandating the delivery of 100% M4(2) homes with some minor exemptions With regard to DP3(f) that states "promote compact forms of development to optimise the site's potential". Density of development should be responsive and sympathetic to the site and its setting. The concern is this policy could be used to justify inappropriate dense forms of development in the wrong context
149) Do you agree with the proposed approach to using design review and other design processes in policy DP4? *Strongly*	agree

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Consultation Question	*Cotswold District Council Response*
agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	
a) If not, what else would help secure better design and placemaking outcomes?	N/A
150) Do you agree that policy TR1 will provide an effective basis for taking a vision-led approach and supporting sustainable transport through plan-making? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	agree?
a) Please provide your reasons, particularly if you disagree.	
151) Do you agree that policy TR2 strikes an appropriate balance between supporting maximum parking standards where they can deliver planning benefits, and requiring a degree of flexibility and consideration of business requirements in setting those standards? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Agree?
a) Please provide your reasons, particularly if you disagree.	this remains extremely hard to deliver in rural areas
152) Do you agree with the changes proposed in policy TR3(1a), including the reference to proposals which could generate a significant amount of movement, and the proposed use of the Connectivity Tool? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	agree?
a) Please provide your reasons, particularly if you disagree.	?

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Consultation Question	*Cotswold District Council Response*
153) Do you agree that proposed policy TR4 provides a sufficient basis for the effective integration of transport considerations in creating well-designed places? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	agree?
a) Please provide your reasons, particularly if you disagree.	?
154) Do you agree with policy TR5 as a basis for supporting the provision and retention of roadside facilities where there is an identified need? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	agree?
a) Please provide your reasons, particularly if you disagree.	
155) Do you agree that the amended wording proposed in policy TR6 provides a clearer basis for considering when transport assessments and travel plans will be required, and for considering impacts on the transport network? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	agree?
a) Please provide your reasons, particularly if you disagree.	?
156) Do you agree the proposed text in policy TR7 provide an effective basis for assessing proposals for marine ports, airports and general aviation facilities? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	neither agree nor disagree

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Consultation Question	*Cotswold District Council Response*
a) Please provide your reasons, particularly if you disagree.	
157) Do you agree with the additional policy on maintaining and improving rights of way proposed in policy TR8? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	strongly agree
a) Please provide your reasons, particularly if you disagree.	
158) Do you agree with the approach to planning for healthy communities in policy HC1, including the expectation that the development plan set local standards for different types of recreational land, drawing upon relevant national standards? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Agree?
a)	Implementation of the policy involves a significant amount of expertise which may not be available to the local planning authority?
159) Do you agree that Local Green Space should be 'close' to the community it serves? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	?
a) Please provide your reasons, particularly if you disagree.	should we be concerned about reference to a local green space not being an extensive tract of land if this is undefined?
160) Do you agree that the proposed policies at HC3 and HC4 will support the provision of community facilities and public	?

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Consultation Question	*Cotswold District Council Response*
service infrastructure serving new development? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	
a) Please provide your reasons, particularly if you disagree.	
161) Do you have any views on whether further clarity is required to improve the application of this policy, including the term 'fast food outlets', and the types of uses to which it applies?	agree but how does the LPA evidence that such local health pollution or antisocial behaviour as part of the processing and within the time limits of a normal planning application?
162) Do you agree with the proposed approach to retaining key community facilities and public service infrastructure in policy HC6? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Strongly Disagree.
a) Please provide your reasons, particularly if you disagree.	Not sure how I feel about the use of the phrase 'established services that are used on a frequent basis' in point 2. Does this mean if it is not used i.e. because it is closed', the policy does not apply? It also suggests that it only applies to facilities that ar the last of thier type in the area concerned. Some villages have a couple of pubs and we have tried very hard to maintain both, this would entirely undermine this. Also what about towns like Cirencester? Is the 'area concerned' the entire town, parts of the town? How is this defined?
163) Do you agree with the approach taken to recreational facilities in policy HC7, including the addition of 'and/or' with reference to quantity and quality of replacement provision?	agree.

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Consultation Question	***Cotswold District Council Response***
Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	
a) Please provide your reasons, particularly if you disagree.	Generally no objection, however, how is informal play space defined? We often get objections on the grounds that vacant fields are used for children to play, but this is not designated. Would this constitute informal play space and could this then block development within settlements?
164) Do you agree with the clarification that Local Green Space should not fall into areas regarded as grey belt or where Green Belt policy on previously developed land apply? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	agree?
a) Please provide your reasons, particularly if you disagree.	
165) Do you agree with policy P1 as a basis for identifying and addressing relevant risks when preparing plans? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	agree?
a) Please provide your reasons, particularly if you disagree.	
166) Are any additional tools or guidance needed to enable better decision-making on contaminated land?	?

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Consultation Question	*Cotswold District Council Response*
167) Do you agree with the criteria set out in proposed policy P3 as a basis for securing acceptable living conditions and managing pollution? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*	Agree?
a) Please provide your reasons, particularly if you disagree.	?
168) Do you agree policy P4 makes sufficiently clear how decision-makers should apply the agent of change principle? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*	agree.
a) Please provide your reasons, particularly if you disagree.	The policy specifically suggests information should be submitted up front and then agreed mitigation secured through conditions or obligations. This is not included within the national validation requirements though.
169) Do you agree policy P5 provides sufficient basis for addressing possible malicious threats and other hazards when considering development proposals? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*	Agree?
170) Do you agree that substantial weight should be given to the benefits of development for defence and public protection purposes? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*	Agree?
a) Please provide your reasons, particularly if you disagree.	

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Consultation Question	*Cotswold District Council Response*
171) Do you agree with the proposed changes set out in policy F3 to improve how Coastal Change Management Areas are identified and taken into account in development plans? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	neither agree nor disagree
a) Please provide your reasons, particularly if you disagree.	
172) Do you agree with the proposed clarifications to the sequential test set out in policy F5? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Agree?
a) Please provide your reasons, particularly if you disagree.	
173) Do you agree with the proposed approach to the exception test set out in policy F6? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Agree?
a) Please provide your reasons, particularly if you disagree	
174) Do you agree with the proposed requirement in policy F8 for sustainable drainage systems to be designed in accordance with the National Standards? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Agree
a) Please provide your reasons, particularly if you disagree.	
175) Do you agree with the proposed new policy to avoid the enclosure of watercourses, and encourage the de-culverting	agree.

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Consultation Question	*Cotswold District Council Response*
and re-naturalisation of river channels? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	
a) Please provide your reasons, particularly if you disagree.	No objection – but should lifetime of the development explicitly include the construction period?
176) Do you agree with the proposed changes to policy for managing development in areas affected by coastal change? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	neither agree nor disagree
a) Please provide your reasons, particularly if you disagree.	
177) The National Coastal Erosion Risk Map sets out where areas may be vulnerable to coastal change based on different scenarios. Do you have views on how these scenarios should be applied to ensure a proportionate approach in applying this policy?	no
178) Do you agree with the proposed new additions to Table 2: Flood Risk Vulnerability Classifications? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Agree?
a) Should any other forms of development should be added? Please give your reasoning and clearly identify which proposed or additional uses you are referring to.	Agree?

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Consultation Question	*Cotswold District Council Response*
179) Do you agree that the proposed approach to planning for the natural environment in policy N1, including the proposed approach to biodiversity net gain, strikes the right balance between consistency, viability, deliverability, and supporting nature recovery? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Strongly disagree.
a) Please provide your reasons, particularly if you disagree.	It is important to retain the term 'measurable' biodiversity net gain in Policy N1(2). Without this, there is a risk that developments exempt from measurable net gains may not follow the mitigation hierarchy, potentially leading to the loss of on-site features and habitats that hold greater intrinsic ecological value.
180) In what circumstances would it be reasonable to seek more than 10% biodiversity net gain on sites being allocated in the development plan, especially where this could support meeting biodiversity net gain obligations on other neighbouring sites in a particular area?	Where evidence demonstrates that the local authority in question has biodiversity levels significantly more depleted than those of neighbouring counties.
181) Do you agree policy N2 sets sufficiently clear expectations for how development proposals should consider and enhance the existing natural characteristics of sites proposed for development? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Agree
a) Please provide your reasons, particularly if you disagree.	

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Consultation Question	*Cotswold District Council Response*
182) Do you agree the policy in Policy N4 provides a sufficiently clear basis for considering development proposals affecting protected landscapes and reflecting the statutory duties which apply to them? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Strongly disagree Need to give great weight to conserving National Landscapes in plan making. For Cotswold, where about 80% of the district is within the Cotswolds National Landscape. The Framework should recognize that National Landscapes are a fundamental constraint in plan making which affects meeting housing need "in full".
a) Please provide your reasons, including how policy can be improved to ensure compliance.	?
183) Do you agree policy N6 provides clarity on the treatment of internationally, nationally and locally recognised site within the planning system? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Strongly disagree
a) Please provide your reasons, particularly if you disagree.	Policy N6 appears to remove protection for potential Special Protection Areas, possible Special Areas of Conservation, listed or proposed Ramsar sites and sites identified, or required, as compensatory measures for adverse effects on habitat sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites. Similarly, the protection provided by

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Consultation Question	*Cotswold District Council Response*
	paragraph 195 of the NPPF (2024) seems to be removed from the draft NPPF.
184) Are there any further issues for planning policy that we need to consider as we take forward the implementation of Environmental Delivery Plans?	?
185) Do you agree the government should implement the additional regard duties under Section 102 of the Levelling-Up and Regeneration Act? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	strongly agree
a) Please provide your reasons.	It is consistent with the Planning (Listed Building & Conservation Act) 1990 and will help sustain the historic environment for the benefit of current and future generations.
186) Do you have any evidence as to the impact of implementing the additional regard duties for development?	No.
187) Do you agree with the approach to plan-making for the historic environment, including the specific requirements for World Heritage Sites and Conservation Areas, set out in policies H1 – H3? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Partly agree.
a) Please provide your reasons, particularly if you disagree.	HE2(1(a)) opens: 'Identify opportunities for development affecting these assets to enhance or better reveal their significance', given the sensitive nature of most heritage assets, a slightly more nuanced wording would be preferable, such as: 'identify any opportunities for

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Consultation Question	*Cotswold District Council Response*
	development affecting these assets that could enhance or better reveal their significance'.
188) Do you agree with the approach to assessing the effects of development on heritage assets set out in policy H5? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	strongly agree.
a) Please provide your reasons, particularly if you disagree.	this is a reasoned approach that accords with Historic England's advocated methodology.
189) Do you agree with the approach to considering impacts on designated heritage assets in policy HE6, including the change from "great weight" to "substantial weight", and in particular the interactions between this and the statutory duties? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	partly disagree.
a) Please provide your reasons, particularly if you disagree.	Whilst the consistent use of 'substantial' for weighting across the document is beneficial for consistency and comparison, from a pragmatic perspective, the word 'substantial' is already used in relation to harm, where it has a specific meaning. It is clearer to use a different word for the harm and weighting, rather than using 'substantial' again, which becomes repetitious, less clear and potentially more confusing for applicants; for example, when 'substantial weight' is given to harm that is below the 'substantial harm' threshold. Perhaps both consistency and clarity would be

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Consultation Question	*Cotswold District Council Response*
	served by using 'substantial weight', but in changing 'substantial harm' to 'considerable harm'.
190) Do you agree with the new policies in relation to world heritage, conservation areas and archaeological assets in policies HE8 – HE10? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	partly agree.
a) Please provide your reasons, particularly if you disagree.	Policy HE10(1) states that 'an appropriate investigation of the asset's significance and the potential effect on this should be undertaken to identify the design of the development proposal, mitigation and implementation of the development'... the word 'identify' here makes little sense; 'inform' would be clearer.
191) Do you have any other comments on the revisions to the heritage chapter?	The interaction between Policy HE6 & Policy CC2(2). The latter states that: Substantial weight should be given to the benefits of improving the energy efficiency of existing buildings'; there is nothing here to differentiate between designated heritage assets and other buildings. This could help clarify potential confusion of this 'substantial weight' being balanced against the 'substantial weight' given to conserving an asset from harm that is below the 'substantial harm' threshold. This could also be alleviated by changing 'substantial harm' to 'great harm' or 'considerable harm'.
192) Do you agree with the transitional arrangements approach to decision-making? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Agree?
a) Please provide your reasons, particularly if you disagree.	?

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Consultation Question	*Cotswold District Council Response*
193) Do you have any further thoughts on the policies outlined in this consultation?	Need to mention the shortcomings of annex C here for somewhere else in this response.
194) Do you agree with the list of Written Ministerial Statements set out in Annex A to the draft Framework whose planning content would be superseded by the policies proposed in this consultation? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree***.**	Agree?
a) Please provide your reasons, particularly if you disagree.	
195) Do you consider the planning regime, including reforms being delivered through the Planning and Infrastructure Act, provide sufficient flexibility for energy generation projects co-located with data centres to be consented under either the NSIP or TCPA regime? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree***.**	neither agree nor disagree
a) Please give reasons.	
196) Would raising the Planning Act 2008 energy generation thresholds for renewable projects that are co-located with data centres in England (for the reason outlined above) be beneficial? *Yes/No*	No, likely to be very unpopular with local communities
a) If so, what do you believe would be the appropriate threshold? Please provide your reasons.	

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Consultation Question	*Cotswold District Council Response*
197) Do you have any views on how we should define 'co-located energy infrastructure'? Please provide your reasons.	?
198) Do you think the renewable energy generation thresholds under Section 15 of the Planning Act 2008 for other use types of projects should be increased, or should this be limited to projects co-located with data centres? *Yes/No*	?
a) Please provide your reasons.	
199) What benefits or risks do you foresee from making this change? Please provide your reasons.	risk to landscape character, risk to loss of agricultural land for a considerable period of time
200) Would you support the use of growth testing for strategic, multi-phase schemes? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	?
201) Would you support the optional use of growth testing for regeneration schemes? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	?
202) Do you agree greater specificity, including single figures, which local planning authorities could choose to diverge from where there is evidence for doing so, would improve speed and certainty? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree***.**	Using a single figure (17.5% mentioned) for Developers return rather than a range (15%-20%) will not have a material difference in the speed and certainty of development as the viability process will be relatively unaffected and will still be required.

Annex A: Cotswold District Council responses to consultation questions on 'Proposed reforms to the National Planning Policy Framework and other changes to the planning system'

Consultation Question	*Cotswold District Council Response*
a) Please explain your answer. If you agree, the government welcomes views on the appropriate figure – for example, whether 17.5% would be an appropriate reflection of the industry standard for most market-led development.	?
203) Are there any site types, tenures, or development models to which alternative, lower figures to 15-20% of Gross Development Value might reasonably apply?	The use of return on GDV is too simplistic. What may be more helpful is a model which considers risks allocation/public purse contributions/etc as well as developers profit. For example a 12% projected return on a project that has been derisked by Public sector money (e.g infrastructure delivery or grant) may be more attractive for a developer to implement that a projected 20% return on a high risk project. Any new model should also provide for a reassessment of costs/values/return and an opportunity for clawback if the developer has made a premium profit over that projected initially. This could include a gainshare for the developer.
a) Please explain your answer. The government is particularly interested in views on whether clarifying an appropriate profit of 6% on Gross Development Value for affordable housing tenures would make viability assessments more transparent and speed up decision-making.	Typically a profit of 6% is assumed for the affordable housing element on developments in Gloucestershire where the full affordable housing element cannot be viably delivered on site- so setting this as a national expectation or requirement should help to reduce negotiation and thereby speed up decision making. This may help for 100% Affordable Housing Schemes but it seems too simplistic for open market schemes – see comments above

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Consultation Question	*Cotswold District Council Response*
204) Are there further ways the government can bring greater specificity and certainty over profit expectations across landowners, site promoters and developers such that the system provides for the level of profit necessary for development to proceed, reducing the need for subjective expectations?	The use of BLV's in conjunction with a viability model which considers risks allocation/public purse contributions/etc as well as developers profit. For example a 12% projected return on a project that has been derisked by Public sector money (e.g infrastructure delivery or grant) may be more attractive for a developer to implement that a projected 20% return on a high risk project. Any new model should also provide for a reassessment of costs/values/return and an opportunity for clawback if the developer has made a premium profit over that projected initially. This could include a gainshare for the developer.
a) Please explain your answer.	see above
205) Existing Viability Planning Practice Guidance refers to developer return in terms a percentage of gross development value. In what ways might the continued use of gross development value be usefully standardised?	Using GDV alone is too simplistic
206) Do you agree there circumstances in which metrics other than profit on gross development value would support more or faster housing delivery, or help to maximise compliance with plan policy? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	The use of return on GDV is too simplistic. What may be more helpful is a model which considers risks allocation/public purse contributions/etc as well as developers profit. For example a 12% projected return on a project that has been derisked by Public sector money (e.g infrastructure delivery or grant) may be more attractive for a developer to implement that a projected 20% return on a high risk project. Any new model should also provide for a reassessment of costs/values/return and an opportunity for clawback if the developer

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Consultation Question	*Cotswold District Council Response*
	has made a premium profit over that projected initially. This could include a gainshare for the developer.
a) Please explain your answer.	see above
207) Are there types of development on which metrics other than profit on gross development value should be routinely accepted as a measure of return e.g. strategic sites large multi-phased schemes, or build to rent schemes?	See comments above
a) Please explain your answer.	
208) Do you agree that guidance should be updated to reflect the fact a premium may not be required in all circumstances? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Strongly Agree
a) In what circumstances might a premium, or the usual premium, not be required?	To compliment the previous response to question 203 and reflect the comparatively lower risks associated with greenbelt and greybelt sites, guidance should be updated to reflect that, in these circumstances, a premium should not be required to promote landowners to bring forwards development, or for developers to bring forwards development (if they own the land). No or limited alternative uses Significant 'abnormals' on the land which will increase development costs

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Consultation Question	*Cotswold District Council Response*
	Landowner benefitting from Development in some other way (e.g profit sharing/property gain as part of development/improved infrastructure or access for other adjacent ;land) Use of BLV's would help with the premium issue.
b) What impact (if any) would you foresee if this change were made?	Helping Landowners understand the lack of hope vale, the lack of alternative income uses for the land and the benefits of bringing the labd forward for development with a predetermined gain and more limited risk.
209) Do you agree that extant consents should not be assumed to be sufficient proof of alternative use value, unless other provisions relating to set out in plans are met? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*	agree
a) Please explain your answer.	?
210) If extant consents were not to be assumed as sufficient proof of alternative use value, should this be at the discretion of the decision-maker, or should another metric (e.g. period of time since consent granted) be used? *Decision maker discretion / Another metric / Neither*	Decision maker discretion (acting reasonably)
a) If another metric, please set out your preferred approach and rationale.	N/A

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Consultation Question	***Cotswold District Council Response***
211) What further steps should the government take to ensure non-policy compliant schemes are not used to inform the determination of benchmark land values in the viability assessments that underpin plan-making?	by stating this explicitly in policy
212) Do you agree that the residual land value of the development proposal should be cross-checked with the residual land values of comparable schemes; to help set the viability assessment in context. *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	agree
a) Please explain your answer.	
213) Do you agree that a 2.5 hectare threshold is appropriate? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	This is in relation to the definition of medium development. I have no issue with this threshold. Does anyone else? Agree
a) Please provide your reasons, particularly if you disagree.	
214) Do you agree that a unit threshold of between 10 and 49 units is appropriate? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	Strongly Disagree
a) Please provide your reasons, particularly if you disagree.	In the event, as is indicated in the planning reform working paper, the Government seeks to remove or reduce affordable housing contributions on sites of 10-49 units, clearly, this approach would lead to the overall reduction in affordable housing delivery, which will undermine the Government's commitment to delivering affordable

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Consultation Question	*Cotswold District Council Response*
	housing at scale. Whilst the proposal to introduce a medium sites category of 10-49 homes is logical, this should not be accompanied with any option to remove or reduce affordable housing delivery as standard
215) Do you foresee risks or operability issues anticipated with the proposed definition of medium development? *Yes/No.*	Yes
216) If so, please explain you answer and provide views on potential mitigations.	
217) Do you have any views on whether the current small development exemption should be extended to cover a wider range of sites – indicatively to sites of fewer than 50 dwellings, or fewer than 120 bedspaces in purpose-built student accommodation?	If the small development exemption relates to affordable housing, no it should not be increased. I believe that 50 dwellings relates to all housing not just affordable housing.
a) Please provide your reasons.	
218) If the exemption were to be extended, do you have any views on whether the development of 120 purpose-built student accommodation bedspaces is an appropriate equivalent to a development of 50 dwellings for the purposes of the levy exemption?	I do not understand the context of this question does anyone else? They are asking if 120 student beds should be considered as equivalent to 50 homes for the purpose of levy exemption – not sure this has a big impact on CDC, Personally I would agree.
a) Please provide your reasons.	
219) If the exemption were to be extended, do you have any views on whether the exemption should be based solely on the	

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Consultation Question	*Cotswold District Council Response*
existing metrics (dwellings/bedspaces) or whether there should also be an area threshold.	No wider metrics required.
220) If you do have views on possible changes to the small developments levy exemption, please specify the potential impact of the possible change of the levy exemption on people with protected characteristics as defined in section 149 of the Equality Act 2010.	?
221) What do you consider to be the potential economic, competitive, and behavioural impacts of possible changes to the levy exemption? Please provide any evidence or examples to support your response.	?
222) Do you agree with the proposal to extend the Permission in Principle application route to medium development? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*.	strongly disagree
a) Please provide your reasons, particularly if you disagree.	this type of permission seems to have little benefit and is confusing for some applicants and most local communities.
223) Do you have views about whether there should be changes to the regulatory procedures for these applications, including whether there should be a requirement for a short planning statement?	?
224) Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic?	no

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Consultation Question	*Cotswold District Council Response*
a) If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how.	not applicable
225) Is there anything that could be done to mitigate any impact identified?	not applicable

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