



30 June 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, 8 July 2026 at 2.00 pm.**

A handwritten signature in cursive script that reads 'Jane Portman'.

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, Paul Evans, David Fowles, Nikki Ind, 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 5 - 14)
To confirm the minutes of the meeting of the Committee held on 10 June 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. **25/02687/FUL Land Parcel East of Willersey Business Park** (Pages 17 - 128)
Proposal

Residential development comprising 60 dwellings with associated roads, accesses, parking and servicing, open space, landscaping and drainage infrastructure at Land Parcel East of Willersey Business Park.

Case Officer:

Martin Perks

Ward Members:

Councillors Gina Blomefield & Tom Stowe

RECOMMENDATION:

PERMIT subject to no objection from Biodiversity Officer (and associated conditions), the completion of a S106 legal agreement covering matters such as affordable housing, self-build/custom build plots, Biodiversity Net Gain monitoring, and financial contributions to education and library services, highways and Willersey Parish Council

9. **26/00613/OUT Land to the East of Nostle Road** (Pages 129 - 196)

Proposal:

Outline application for 50 dwellings, plus associated infrastructure and landscaping. All matters reserved except access at Land To The East Of Nostle Road, Nostle Road, Northleach.

Case Officer:

Martin Perks

Ward Member:

Councillor Tony Dale

RECOMMENDATION:

PERMIT subject to no objection from Biodiversity Officer (and any associated conditions), completion of a S106 legal agreement covering the provision of affordable and self-build/custom build housing, Biodiversity Net Gain Monitoring and financial contributions to secondary (16-18) education, library services, school transport, bus stops and a travel plan.

10. **25/02443/FUL Land to the West of Fossey Farm** (Pages 197 - 228)

Proposal:

Construction of 10no. dwellings at Land to the West of Fossey Farm, Stow Road Moreton-In-Marsh.

Case Officer

Rebecca McAndrew

Ward Member

Councillor Daryl Corps

RECOMMENDATION:

PERMIT subject to the completion of a S.106 agreement securing:
Travel plan and the offsite highways work monitoring

11. **Sites Inspection Briefing**

Members for 5 August 2026 to be notified (if required)

12. **Licensing Sub-Committee**

Members for 9 July 2026

Councillors Dilys Neill (Chair), David Fowles, Ray Brassington

Members for 14 July 2026

Councillors Ian Watson (Chair). Julia Judd, Michael Vann

(END)



Planning and Licensing Committee
10/June2026

Minutes of a meeting of Planning and Licensing Committee held on Wednesday, 10 June 2026

Members present:

Dilys Neill (Chair)	Ian Watson (Vice Chair)	
Ray Brassington	Daryl Corps	Julia Judd
Nick Bridges	Paul Evans	Michael Vann
Patrick Coleman	Nikki Ind	

Officers present:

Marie Barnes, Lawyer	Andrew Moody, Senior Planning Officer
Harrison Bowley, Head of Planning Services	Martin Perks, Principal Planning Officer
Simon Harper, Head of Democratic Services and Elections	Jordan Hawes
Nickie Mackenzie-Daste, Senior Democratic Services Officer	Julia Gibson, Democratic Services Officer

Observers:

Councillor Gina Blomefield, David Fowles, Laura Hall-Wilson and Tom Stowe

289 Apologies

There were no apologies.

290 Substitute Members

There were no substitute Members.

291 Declarations of Interest

There were declarations of interest from Councillor Nikki Ind for agenda item 10, due to previous involvement in supporting the GP surgery application. They noted that this could be perceived as bias or predetermination and they would not take part in the debate or vote.

292 Minutes

The minutes of the meeting on 13 May 2026 were discussed. Councillor Nikki Ind proposed accepting the minutes and Councillor Julia Judd seconded the proposal which was put to the vote and agreed by the Committee.

RESOLVED: to APPROVE the minutes of the meeting held on 13 May 2026.

To confirm minutes 13 May 2026 (Resolution)		
For	Ray Brassington, Nick Bridges, Patrick Coleman, Nikki Ind, Julia Judd, Dilys Neill and Michael Vann	7
Against	None	0
Conflict Of Interests	None	0
Abstain	Daryl Corps, Paul Evans and Ian Watson	3
Carried		

293 Chair's Announcements

Thanks were given for the recent planning training, with a rolling programme of supplementary updates being developed due to ongoing changes in planning rules. Members were invited to request topics they would like included in future training sessions.

Licensing training dates would be circulated to Committee members.

294 Public questions

There were no public questions.

295 Member questions

Councillor Ray Brassington asked:

Would the council provide an update on the enforcement situation relating to flying activities at Rendcomb airfield?

The Chair answered: "The Planning Enforcement Team was continuing to investigate the reported breach of legal obligations as a high priority, with senior officers actively progressing the case to determine whether further action is expedient and proportionate. Members were reminded that enforcement investigations must be handled carefully in line with the Council's legal duties to avoid prejudicing the investigation or limiting potential formal action."

Further details on the Enforcement timeline was requested.

296 25/02687/FUL - Land Parcel East of Willersey Business Park

The proposal was for residential development comprising 60 dwellings with associated roads, accesses, parking and servicing, open space, landscaping and drainage infrastructure.

Planning and Licensing Committee

10/June2026

Case Officer: Martin Perks

Ward Members: Councillors Gina Blomefield and Tom Stowe

Recommendation:

PERMIT subject to no objection from Biodiversity Officer (and associated conditions), the completion of a S106 legal agreement covering matters such as affordable housing, self-build/custom build plots, Biodiversity Net Gain monitoring, and financial contributions to education and library services and Willersey Parish Council.

The Case Officer shared the application details with the Committee.

Additional details:

- Members were advised that an updated set of plans had been circulated, accurately reflecting the proposed site layout and play areas.
- An update was provided following a response from Gloucestershire County Council Highways, clarifying that a new bus shelter near the recreation ground would not be justified, although contributions or improvements to bus stops on Main Street could potentially be justified.
- A supplementary update included objections and general comments from residents and Willersey Parish Council.

Public Speakers

Public speaker – Councillor Kevin O’Donoghue – Town and Parish Council

The Parish Council did not object in principle but requested deferral for further evidence on three key issues: noise impacts from the adjacent factory, the adequacy and methodology of the £8,000 Section 106 leisure contribution, and the status of former allotment land as open space of potential public value requiring fuller assessment of need and demand before any conclusion was reached.

Public speaker – Alastair McGrigor – Objector

Multiple current and proposed developments in and around Willersey could cumulatively increase pressure on already inadequate sewerage infrastructure and the Badsey Pumping Station, with concerns raised about recent sewage flooding incidents. Reference was made to the use of Grampian conditions, with confirmation that similar conditions to those applied at Folly View had been included in the current application.

Public Speaker – Councillor Gina Blomefield – Ward Member

Concerns were raised regarding highway safety at the site access, limited village infrastructure, lack of local employment opportunities, and significant pressure on existing sewage and drainage systems. These issues had been addressed through proposed planning conditions, and support was expressed for strong conditions to be secured.

Public Speaker – Councillor Tom Stowe – Ward Member

Concerns were raised that development in Willersey should not exacerbate infrastructure issues, particularly relating to a failing sewage and drainage network,

with reports of repeated flooding and capacity problems and no clear timetable from Severn Trent for resolution. Concerns were highlighted regarding highway safety at the proposed access onto the B4632, including limited visibility, reliance on speed mitigation measures, and potential risks despite compliance with minimum standards. The importance of effective Section 106 contributions was noted, with a request that development should not proceed without robust mitigation to protect residents' safety and quality of life.

SIB feedback.

- Fast-moving traffic was reported on the adjacent road, including large industrial vehicles using the former A46 as a busy through route.
- Concerns that visibility issues could make it difficult and unsafe for vehicles to emerge from the site.
- The site was not isolated and closely linked to the village, with residential development considered inappropriate without major highway improvements
- Surrounding countryside described as attractive open fields.
- Former allotment area observed as overgrown and bramble-covered.

Members questions

Members of the Committee asked a series of questions and noted that:

- The proposed footpath/pavement would be set back within the development site. Existing sections would be upgraded with improved pavement provision and a tactile crossing, alongside a stepped reduction in road speed limits.
- Highways have been involved and had assessed the proposal using transport statements and technical data (including movements, visibility and speed). While it was not confirmed whether an on-site visit took place, they have not objected and considered the access acceptable.
- The development would have two pedestrian access points. The principal access to the village would be via the south-west corner, linking directly to the existing pavement, meaning pedestrians would not need to walk along the carriageway.
- A public footpath provided an alternative route from the proposed vehicle entrance to the church and village school. This offered a shorter route into the village but concerns were raised about how pedestrians, particularly children, would safely cross the road to access it, and it was acknowledged that the footpath may be less suitable in winter due to wet and muddy conditions.
- The £8,000 Section 106 recreation contribution was considered reasonable because the development included open space and play facilities, reducing reliance on the village recreation ground. The scheme would provide £120,000 towards the village hall, with further income to the Parish Council through CIL receipts.
- Gloucestershire Highways advised that the bus stop near the recreation ground was not a recognised stop with a bus service, so a new shelter would not be justified.

10/June2026

- The proposed Grampian condition would require sewer upgrades to be agreed before development commences and implemented before occupation. Responsibility for providing adequate sewer capacity rested with Severn Trent under its statutory duties. The development could be built out, but occupation would not be permitted until the required sewerage upgrades agreed with Severn Trent had been completed.
- The use of the adjacent site was for outdoor vehicle and material storage, and existing noise controls were considered sufficient.
- If the Parish Council did not take on the open space, it would be managed by a private management company, with residents paying an annual maintenance fee.
- Highway measures, such as speed bumps, would be a matter for Gloucestershire County Council as the highway authority.
- The hedgerow viewed was outside the application site. If it was ecologically important, it was already protected under hedgerow regulations.
- Officers confirmed the footpath would be widened to approximately 1.8–2 metres as part of the highway improvements, which was considered standard width and suitable for pedestrians, pushchairs and cyclists to pass safely.
- Pedestrian/cycle access would link into the approved Auto Sleepers site entrance, which formed part of a one-way system. Vehicles were expected to exit rather than enter at that point, and HGV movements were considered limited. The arrangement includes segregated footways and a tactile crossing, with the pedestrian route continuing through to the improved pavement network.

Member comments

- There was significant development activity just across the local authority boundary, and concerns were raised about the cumulative impact of multiple developments on already small surrounding roads.

Members felt that there was not sufficient information to make an assessment as to whether or not the development would have an impact on the highway safety. A request was made for Gloucestershire County Council Highways officers to undertake a site visit and attend the Planning Committee to provide further clarity on highway safety considerations.

Councillor Julia Judd proposed DEFERING the application and Councillor Ray Brassington seconded the proposal. The proposal was put to the vote and agreed by the Committee.

RESOLVED: to DEFER the application to request attendance of the GCC Highways Officer.

To DEFER 25/02687/FUL (Resolution)		
For	Ray Brassington, Nick Bridges, Patrick Coleman, Daryl Corps, Paul Evans, Nikki Ind, Julia Judd, Dilys Neill, Michael Vann and Ian Watson	10
Against	None	0
Conflict Of Interests	None	0
Abstain	None	0
Carried		

297 25/03721/FUL - Cutlers Field And Horcott Hill

The proposal was change of use of agricultural land to allow for the siting of caravans in association with Fairford Royal International Air Tattoo.

Case Officer: Jordan Hawes

Ward Members: Councillors Tristan Wilkinson and Helene Mansilla

Recommendation: PERMIT

The Case Officer shared the application details with the Committee.

Public Speaker

Public speaker – Emma Wellman – Applicant

The Royal International Air Tattoo at RAF Fairford was a major annual event with significant economic and educational benefits. The campsites will be used to accommodate volunteers and contractors and operate on a short-term basis on agricultural land that would be fully reinstated afterwards.

Councillor Daryl Corps proposed PERMITTING the application and Councillor Julia Judd seconded the proposal. The proposal was put to the vote and agreed by the Committee.

RESOLVED: to PERMIT the application.

To PERMIT 25/03721/FUL (Resolution)		
For	Ray Brassington, Nick Bridges, Patrick Coleman, Daryl Corps, Paul Evans, Nikki Ind, Julia Judd, Dilys Neill, Michael Vann and Ian Watson	10
Against	None	0
Conflict Of Interests	None	0
Abstain	None	0
Carried		

298 Footpath Diversion Order - Tetbury Upton Footpath

The proposal was to consider making a Public Path Diversion Order in respect of TETBURY UPTON Footpath No NTU 46 (Part) at Worwell Farm.

Ward Members: Councillors Nikki Ind and Laura Hall-Wilson

Report Author: Andrew Moody

Recommendations:

That Planning and Licensing Committee resolves to:

- a) Make a Public Path Diversion Order in respect of TETBURY UPTON Footpath No NTU 46 (Part) under Section 257 Town and Country Planning Act 1990 and carry out the statutory consultation (subject to response and any final minor amendment required by the County Council PROW Officers).
- b) To confirm the Public Path Diversion Order, if unopposed.

The Case Officer shared the application details with the Committee.

Updates:

- Additional representations did not include any objections.
- Annex C supplied supporting photographic evidence.

Public Speakers

Councillor Nikki Ind – Ward Member

Councillor Laura Hall-Wilson – Ward Member

The Ward Members expressed support for the footpath diversion order at Worwell Farm, noting that the revised route was an improvement on the previous path and that concerns raised during consultation had been addressed. It was confirmed that permissive access to the Tetbury Avon remained in place, and that the path width and usability had been reviewed on site and found to be satisfactory.

Councillor Nikki Ind left the Chamber.

Member Questions

- A gate provided access to the permissive route, which remained available to users. This access was not formally part of the footpath diversion order but was retained through permissive arrangements.

Councillor Julia Judd proposed PERMITTING the application and Councillor Paul Evans seconded the proposal. The proposal was put to the vote and agreed by the Committee.

RESOLVED: to PERMIT the order.

To APPROVE the Footpath Diversion Order (Resolution)		
For	Ray Brassington, Nick Bridges, Patrick Coleman, Daryl Corps, Paul Evans, Julia Judd, Michael Vann and Ian Watson	8
Against	None	0
Conflict Of Interests	Nikki Ind	1
Abstain	None	0
Carried		

299 Enforcement Plan

Purpose

This report presents the Council’s draft Local Enforcement Plan 2026–2028 for endorsement. The Planning Committee was asked to endorse the Plan as the Council’s formal policy approach to planning enforcement for the period 2026–2028.

Accountable member: Councillor Juliet Layton - Cabinet Member for Housing and Planning

Report author: Harrison Bowley – Head of Planning Services

Recommendation:

That the Planning and Licencing Committee resolves to:

1. Endorse the Local Enforcement Plan

Councillor Nikki Ind returned to the Chamber.

The Report author shared the application details with the Committee.

Members Questions

- The team was now fully staffed at 5.5 FTE.
- Work was ongoing to improve reporting systems. Resources were currently being prioritised for active enforcement work, so reporting improvements would be delivered gradually.
- The Section 106 monitoring officer tracked obligations as they were triggered, largely based on developer notification and periodic reporting rather than routine site inspections.
- Annex A would be found in the Overview & Scrutiny Committee report.

Councillor Patrick Coleman proposed APPROVING the recommendations and Councillor Ian Watson seconded the proposal. The proposal was put to the vote and agreed by the Committee.

RESOLVED: To ENDORSE the Local Enforcement Plan

To ENDORSE the Local Enforcement Plan (Resolution)		
For	Ray Brassington, Nick Bridges, Patrick Coleman, Daryl Corps, Paul Evans, Nikki Ind, Julia Judd, Dilys Neill, Michael Vann and Ian Watson	10
Against	None	0
Conflict Of Interests	None	0
Abstain	None	0
Carried		

300 Appointments to Sub-Committee

Purpose

To invite the Licensing Committee to confirm the appointment of Sub-Committees for the 2026/27 municipal year.

Accountable member: Councillor Dilys Neill

Recommendations:

That the Planning and Licensing Committee resolved to:

1. Appoint five members of the Committee to the Licensing Sub-Committee (Taxi, Private Hire and Street Trading) in accordance with political proportionality and the wishes of political groups (3 Liberal Democrat, 2 Conservative);
2. Note that Licensing Sub-Committee membership will comprise the Chair or Vice Chair of the Planning and Licensing Committee and two other members of the Planning and Licensing Committee drawn on an alphabetical rota basis from the remaining members of the Planning and Licensing Committee (subject to their availability and completion of licensing training prior to participation in a Licensing Sub Committee (Licensing Act 2003) meeting).

The Report Author shared the report details with the Committee.

Councillor Julia Judd proposed APPROVING the recommendations and Councillor Ray Brassington seconded the proposal. The proposal was put to the vote and agreed by the Committee.

RESOLVED: to APPROVE the recommendations.

To APPROVE the Licensing Sub-Committee appointments (Resolution)		
For	Ray Brassington, Nick Bridges, Patrick Coleman, Daryl Corps, Paul Evans, Nikki Ind, Julia Judd, Dilys Neill, Michael Vann and Ian Watson	10
Against	None	0
Conflict Of Interests	None	0
Abstain	None	0
Carried		

301 Sites Inspection Briefing

Members for 1 July 2026.

Councillors Dilys Neill (Chair), Ian Watson, Daryl Corps, Paul Evans, Nikki Ind.

302 Licensing Sub-Committee

Members for 25 June 2026 at 2pm.

Councillors Ian Watson (Chair), Julia Judd (Vice-Chair), Michael Vann, David Fowles, Ray Brassington.

The Meeting commenced at 2.00 pm and closed at 4.35 pm

Chair

PLANNING AND LICENSING COMMITTEE 8 July 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 8 July 2026
INDEX TO APPLICATIONS FOR CONSIDERATION AND DECISION

Parish	Application	Schedule Order No.
Willersey	Land Parcel East of Willersey Business Park Willersey Gloucestershire 25/02687/FUL Full Application	1
Northleach With Eastington	Land to the East of Nostle Road Nostle Road Northleach Gloucestershire 26/00613/OUT Outline Application	2
Moreton In Marsh	Land to the West of Fosseyway Farm Stow Road Moreton-In-Marsh Gloucestershire 25/02443/FUL Full Application	3

Residential development comprising 60 dwellings with associated roads, accesses, parking and servicing, open space, landscaping and drainage infrastructure at Land Parcel East of Willersey Business Park Willersey Gloucestershire

Full Application 25/02687/FUL	
Applicant:	Gloucester Diocesan Board of Finance
Agent:	PJS Development Solutions Ltd
Case Officer:	Martin Perks
Ward Member(s):	Councillor Gina Blomefield & Councillor Tom Stowe
Committee Date:	8 July 2026
RECOMMENDATION:	PERMIT subject to no objection from Biodiversity Officer (and associated conditions), the completion of a S106 legal agreement covering matters such as affordable housing, self-build/custom build plots, Biodiversity Net Gain monitoring, and financial contributions to education and library services, highways and Willersey Parish Council

UPDATE

This application was deferred from the Planning and Licensing Committee meeting held on the 10th June 2026 in order that a Gloucestershire County Council Highway Officer could attend a future Committee meeting and answer questions relating to matters of highway safety.

Gloucestershire County Council (GCC) has confirmed that an Officer will be in attendance at the meeting to be held on the 8th July 2026. In addition, an updated response from GCC Highways has been provided following the June Committee meeting. A copy of the latest response dated the 22nd June 2026 is attached to this report.

GCC Highways raises no objection to this application. However, it has requested the following financial contributions:

' Recommended Planning Obligations (S106)

A Section 106 Agreement should secure:

- *Travel Plan Monitoring Fee: £5,000*

- **Travel Plan Bond/Deposit: £28,200**
- **Education transport contribution: £58,710**
- **Bus stop improvements: up to £23,600, with a minimum deliverable package of £13,600, final scope to be agreed**
- **Traffic Regulation Order contribution: approximately £15,000**
- **Delivery of all off-site highway works**

The planning obligations sought in connection with this development have been assessed against the tests set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended). Each obligation is necessary to make the development acceptable in planning terms, as they directly mitigate identified impacts arising from the development, including increased demand on the transport network, school transport provision, and sustainable travel infrastructure. The obligations are directly related to the development, as they address impacts attributable to the proposed dwellings and their associated travel demand. They are also fairly and reasonably related in scale and kind, reflecting the scale of the development, its location, and the extent of mitigation required. Taken together, the overall package of S106 contributions represents a proportionate and policy-compliant response to the development's transport impacts, with no unnecessary or unrelated requirements included.

The applicant has yet to confirm whether the requested contributions are acceptable to them.

With regard to Biodiversity Net Gain, discussions remain ongoing between the applicant and the Biodiversity Officer.

The report to the meeting held on the 10th June 2026 was as follows:

1. Main Issues:

- (a) Residential Development in a Development Boundary
- (b) Housing Mix and Affordable Housing
- (c) Design and Impact on the Character and Appearance of the Area
- (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 because it constitutes major development having regard to the Town and County Planning (Development Management Procedure) (England) Order 2015.

3. Site Description:

- 3.1 This application relates to an area of agricultural land lying to the east of Willersey Business Park/Industrial Estate, which is itself located on the northern edge of the village of Willersey. The application site measures approximately 3.35 hectares in size and is linear in form. It extends in a north-south direction. The southern boundary of the site adjoins the B4632, its eastern and northern boundaries adjoin agricultural fields. A former railway line runs in a south-west to north-east direction to the north of the application site. It lies approximately 25m from the application site at its closest point. The western boundary of the application site adjoins an agricultural field. However, the field benefits from planning permission for employment development (22/03534/FUL) as part of a proposal to extend the adjacent industrial estate. The application site is located approximately 50m to the east of the existing industrial estate.
- 3.2 The application site has a relatively flat appearance. However, land levels decrease uniformly by approximately 6m from the site's southern boundary to its northern edge (a distance of approximately 350m-400m).
- 3.3 The majority of the site is located within Willersey Development Boundary as designated in the Cotswold District Local Plan 2011-2031. However, the northern section of the application site is located outside the aforementioned development boundary. The land in question measures approximately 75-90m in length by 90m in width. The area of the site proposed for housing falls within the village's development boundary.
- 3.4 The area of the site falling within Willersey Development Boundary and the area of land recently granted permission for employment development are allocated in the Local Plan for residential and employment purposes - W_7A/WIL_E1C - Land north of B4632 and east of employment estate (49 dwellings net and 1.97 hectares for B1, B2 and/or B8 use class employment land).
- 3.5 Willersey Industrial Estate is designated as an Established Employment Site in the Local Plan - Willersey Industrial Estate (EES5).

- 3.6 The site is located outside the Cotswolds National Landscape (CNL). The boundary of the CNL extends along the southern side of the B4632 which runs adjacent to the southern boundary of the application site.
- 3.7 The site is located outside Willersey Conservation Area (CA). The boundary of the CA is located approximately 60m to the south-west of the application site.
- 3.8 A Public Right of Way (HWY4) runs in a north-south direction approximately 35m to the east of the application site.
- 3.9 The site is located within Flood Zone 1.

4. Relevant Planning History:

Application site

- 4.1 CD.6002 Construction of a new vehicular access. Permitted 1979

Land to west of application site

- 4.2 22/03534/FUL Employment development comprising new production, office, workshop and service buildings, covered storage areas, external storage areas for products and parts, parking areas and vehicular access to the B4632 road, landscaping and external works. Permitted 2024

5. Planning Policies:

- DS1 Development Strategy
- DS2 Dev within Development Boundaries
- 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
- EN12 HE: Non-designated Heritage Assets
- EN14 Managing Flood Risk
- EN15 Pollution & Contaminated Land
- INF1 Infrastructure Delivery
- INF2 Social & Community Infrastructure
- INF3 Sustainable Transport

- INF4 Highway Safety
- INF5 Parking Provision
- INF7 Green Infrastructure
- INF8 Water Management 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: No objection subject to conditions.
- 6.3 Gloucestershire County Council Archaeology: *'In my view there is a low risk that 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.'*
- 6.4 Gloucestershire County Council Community Infrastructure: Requests contributions of £79,542.40 to secondary 16-18 education and & £11,760 to library services.
- 6.5 Biodiversity Officer: Further information requested.
- 6.6 Tree Officer: No objection subject to condition.
- 6.7 Environmental and Regulatory Services Noise: No objection subject to condition.
- 6.8 Environmental and Regulatory Services Air Quality: No objection
- 6.9 Severn Trent Water: No objection subject to condition.
- 6.10 Thames Water: Requests condition covering water supply.
- 6.11 Wychavon District Council: *'On behalf of Wychavon District Council we note the site is already an allocation with the adopted Cotswold Local Plan and accordingly have no further comments to make.'*
- 6.12 Worcestershire County Council: No response received to date

7. View of Parish Council:

7.1 Response received on the 23rd November 2025:

7.1.1 Willersey Parish Council is aware of the above application and, having engaged with the developer and considered the proposals in light of community concerns, hereby wishes to register its formal and robust objection unless fundamental infrastructure and safety concerns are fully mitigated.

7.1.2 While the Parish Council acknowledges this site is identified within the Local Plan (W7A/WIL-EC1) and welcomes the amendments made—including the proposed housing split and the allocation of bungalows, social, and affordable housing—we assert that the application fails to meet key tests within the National Planning Policy Framework (NPPF 2024) and the Cotswold District Local Plan (CDLP).

7.1.3 Flooding, Foul Sewage, and Surface Water (NPPF 170; CDLP EN14)

The Parish Council deems the lack of capacity within the existing sewage and water systems to be of primary importance to the health and wellbeing of our residents.

- Foul Sewage Capacity: Frequent flooding of both rainwater and untreated sewage is experienced in all parts of the village. Foul sewage has, on many occasions, reached the watercourses of Badsey Brook and its culverts.*
- Inadequate Pumping Station: The Badsey Lane pumping station is completely inadequate for the existing housing stock, let alone a further 60 properties. Severn Trent has already instigated a Grampian Condition, confirming their present inability to upgrade the system necessary to service this development.*
- Water Supply Network Capacity: The Planning Statement is silent on this critical issue. The Thames Water Comments on a comparable local application (25/02983/OUT) officially confirmed the "inability of the existing water network infrastructure to accommodate the needs of this development proposal," requiring network upgrades before occupation. This confirms that the necessary infrastructure is not currently available, placing an unacceptable risk of no/low water pressure on existing residents and directly contravening planning policy.*

- *Non-Compliance: The lack of essential infrastructure is detrimental to the health and wellbeing of residents, and unless fully remedied, the application fails to meet the needs of NPPF 170 and CDLP EN14. Evidence of flooding has been previously submitted.*

7.1.4 Highway Safety and Burdensome Traffic (NPPF 96; NPPF 109)

The issue of Highway Safety, raised by both the Parish Council and residents, represents the second critical barrier to this development.

- *Hazardous Access Location: The proposed access route is situated on the B4632 at a blind bend with no current footway. The B4632 is known for considerable speeding, with traffic often exceeding the 30 mph limit approaching the village.*
- *Poor Visibility: There is a poor line of sight in both directions. Approaching the village from the Stratford direction, vehicles travelling at speed will have little or no visibility of a vehicle attempting a right turn into the development. Conversely, traffic exiting the village frequently accelerates towards the 40 mph zone, creating risk for vehicles turning left. The application does not fully address this safety deficit.*
- *Conflict with HGV Movements: This stretch of road is also designated for the egress of large HGVs from the adjacent Autosleepers site (under granted planning application 22/0654/FUL). The proximity of the proposed access road to the Autosleepers egress will lead to a direct conflict between HGV traffic and the development's residents.*
- *Traffic Burden: With 60 properties, there will likely be at least 120 additional vehicle movements per day along a section of the B4632 that is already overburdened with HGVs avoiding the congested A44 and A46, using Willersey as a rat run.*
- *Unsustainable Transport: All essential facilities (shops, health, secondary schools) are at least two miles distant, necessitating car use. Public transport is infrequent and the nearest stop is over 500 metres away, requiring residents to cross the Badsey Lane/Pike Corner roundabout, a known accident blackspot. This contradicts sustainable transport policies and fails to comply with NPPF 109.*

7.1.5 Design, Community Facilities, and Noise (NPPF 104; NPPF 134; CDLP H1, INF7)

While the design is generally compliant with CDC guidance, significant concerns remain regarding the deployment of amenity space and the impact of adjoining land uses.

- Misuse of Amenity Space: The proposed playground is considered redundant, given the village already maintains a comprehensive play area within 500 metres. Furthermore, its placement adjacent to a SUDS pond poses an inherent danger to small children.*
- Loss of Allotments: The proposed development has resulted in the loss of much-used allotments for village residents. The Parish Council suggests the amenity space could be better utilised to replace these lost allotments. This loss of facility is a further erosion of community amenity which should be addressed.*
- Noise Impact: Concerns regarding Noise generation from the expanding Willersey Business Park (Autosleepers) remain unmet. The Noise Impact Assessment provided is insufficient as it was undertaken prior to any expansion work. The proposed 'bund' and non-overlooking windows are not felt to be sufficient protection from the noise, which, under certain climatic conditions, is already audible across the village. The imminent expansion means the noise impact will rise, which is likely to be detrimental to the health and wellbeing of residents.*

7.1.6 Wider Infrastructure and Sustainability (NPPF 96, 98, 100 101; CDLP INF1)

- Reliance on Neighbouring Authority: The lack of employment opportunities and essential services within the village necessitates that many residents must travel into the neighbouring local authority area of Wychavon in order to shop, work, and access medical services (such as those in Broadway and Evesham). This reliance on cross-border travel, almost exclusively by private car, highlights the unsustainability of the location.*
- School Capacity: The local primary school is approaching capacity in most year groups. Consequently, the influx of families from 60 new dwellings will likely exceed remaining capacity, necessitating that children be transported by vehicle to the nearest available location (potentially out-of-county). This adds strain to educational transport budgets and increases vehicle movements on an already stressed network. The nearest secondary school, Chipping Campden, is also heavily oversubscribed.*

- *Health Access: All necessary health facilities are at least 3 miles distant. Accessing the nearest doctors in Broadway requires crossing the A44 (a 60 mph road), which is not safely accessible on foot.*
- *Cumulative Effect: This development, coupled with applications at Folly View (25/02983/OUT) and the expected proposal at Willow Green, will almost double the size of the village. Given CDC's position that Willersey is not a principal settlement, the Parish Council asserts that this is not a sustainable location for large-scale greenfield housing.*

7.1.7 Landscape, Heritage, and Biodiversity (NPPF 187, 189 & 190)

- *AONB and Landscape Impact: The Planning Statement correctly notes that the site is outside the AONB but, given that the AONB is immediately to the south, it does lie within its setting. The development should be assessed with great weight given to conserving scenic beauty (NPPF Paragraphs 189 & 190). While the proposal includes a landscaped edge, the scale and design must be rigorously scrutinised to prevent the gradual, irreversible erosion of the AONB border and avoid coalescence with Broadway, which threatens to turn Willersey into an "urbanised satellite."*
- *Heritage and Archaeology: While the site is distant from Listed buildings and the Willersey Conservation Area, and the applicant states that archaeological investigations found "nothing considered to be of archaeological significance," the application lacks a full Heritage Statement to address the site's setting adjacent to the historic settlement. Furthermore, the Parish Council disputes the dismissal of archaeological potential; the 2017 assessment recommended on-site work which does not appear to have been satisfactorily completed. Given recent finds in the locality (including swords and potential Roman remains), this oversight must be rectified.*
- *Biodiversity Net Gain: The proposed net gain appears overstated. The land is currently greenfield used for rural domestic activities (including the lost allotments). To replace this with limited planting, while tarmacking large areas, is not considered a genuine environmental or wellbeing gain for the village.*
- *Dark Skies: The majority of the village has no street lights. We are concerned that lighting associated with this development will add to existing light pollution, conflicting with the AONB's promotion of the Dark Sky ethos (NPPF 15). Any lighting must be strictly low-key to retain the village's rural character.*

7.1.8 In summary, while the Parish Council wishes to support the provision of housing, the substantial, unmitigated concerns regarding sewage and flooding capacity, highway safety, and the lack of essential social infrastructure constitute clear contraventions of the NPPF and outweigh the principle of development at this time.'

7.1.9 Willersey Parish Council has also requested S106 contributions towards improvements/works to the village hall, the recreation ground and cemetery, as well as a contribution towards/provision of allotments (attached).

8. Other Representations:

8.1 Approximately 44 objections received.

8.2 Main grounds of objection are:

- i) Unsustainable Location and Infrastructure Pressure.
- ii) Willersey is a small rural settlement with limited services, employment opportunities, and public transport. Adding 60 dwellings would significantly increase the population without the necessary infrastructure to support it. The village school, road network, and drainage systems are already under strain. The proposal would increase traffic along the B4632 and Station Road, both of which are narrow and already hazardous. No adequate mitigation has been presented to address congestion, pedestrian safety, or air quality impacts.
- iii) Harm to Landscape Character and the AONB Setting.
- iv) The proposed site forms part of the open countryside at the edge of the Cotswolds Area of Outstanding Natural Beauty (AONB). Development here would erode the rural setting that defines the approach to Willersey, leading to unacceptable visual intrusion. The Cotswold District Local Plan (Policy EN4 and EN5) requires development to conserve and enhance the landscape and scenic beauty of the AONB and its setting. The proposed massing, lighting, and urban form are entirely out of character with the surrounding agricultural landscape and would set a damaging precedent for further encroachment.
- v) Inadequate Biodiversity and Drainage Measures.
- vi) The applicant's Preliminary Ecological Appraisal and Biodiversity Net Gain (BNG) statement are insufficiently detailed. There is little evidence that the site can deliver genuine net biodiversity gains, as required under the Environment Act 2021. The drainage strategy is also underdeveloped: Willersey already suffers from surface-water flooding, and the introduction of impermeable surfaces on this scale would exacerbate local flood risk. The application fails to demonstrate compliance with Policy EN14 (Flood Risk) and

INF7 (Sustainable Drainage Systems). The increased number of domestic cats and dogs would further impact birds, bats and reptiles.

vii) Design, Density, and Heritage Context.

viii) The proposed layout and density do not respect Willersey's character or traditional village form. The uniform house types and suburban layout lack the variation, vernacular detailing, and integration with existing built form that Policy EN2 demands. The development would visually and physically detach from the historic core of the village, undermining its sense of place and heritage value.

ix) Conflict with Local and National Planning Policy.

x) This proposal conflicts with the Cotswold District Local Plan and the National Planning Policy Framework (NPPF) on multiple counts: it is unsustainable, harmful to local character, and fails to meet the tests of environmental protection and landscape conservation. The Council can demonstrate a healthy housing land supply, so there is no justification for approving speculative development that damages the rural environment.

xi) Increased Traffic and Dangerous Rural Roads.

xii) The proposed access routes-particularly via Station Road, Main Street, and the B4632-are narrow, winding, and ill-suited to handle heavy additional traffic volumes. These roads already experience congestion at peak times, with poor visibility at several junctions and tight bends. There are few footpaths or safe cycle routes, and no street lighting in places, creating significant hazards for pedestrians, schoolchildren, and cyclists. Increased car use from 60 new homes would exacerbate accident risks, noise, and air pollution, undermining the rural character of the village.

xiii) The B4632 is already recognised as a problematic route for large vehicles and through-traffic between Broadway and Mickleton. Collin Lane has a very dangerous bridge and several accident hotspots and has been closed twice for the air ambulance in the past 5 years. Adding dozens of new daily car trips will intensify wear on these narrow country lanes and worsen existing safety issues. No credible transport assessment or highway improvement plan has been provided to demonstrate that the road network can safely accommodate this scale of growth. This directly conflicts with Policy INF4 of the Cotswold District Local Plan, which requires development to ensure a safe and suitable access for all users.

xiv) Infrastructure Incapacity - The Planning Statement's assertion that the proposal will deliver "planned sustainable housing growth" is directly undermined by known, severe deficiencies in critical infrastructure in Willersey. These issues must be definitively resolved before planning permission can be granted, as the current proposal fails to satisfy NPPF Paragraphs 98 and 101 and CDLP Policy INF1 (Supporting Infrastructure):

xv) Foul Sewerage, Drainage, and Flood Risk: The document acknowledges "more technical work to undertake on foul drainage design, in liaison with Severn Trent Water", but claims this is "not a reason for withholding planning consent". This position is untenable. The existing single-pipe system is severely overburdened, resulting in frequent and severe sewage spills, raw sewage discharge into floodwaters and residential gardens, and a public health risk affecting properties on Collin Lane, Blind Lane, and Badsey Road. I note that Severn Trent has issued a Holding Objection to a nearby application due to the network's inability to accommodate new demand, a concern which applies equally here. Satisfactory drainage must be demonstrated before consent, not merely facilitated by it. The application is supported by a Flood Risk Assessment and Sustainable Drainage Strategy, which demonstrates the development will not be at risk of flooding or increase risk elsewhere, but the necessary technical work with Severn Trent is still pending.

xvi) Water Supply Network Capacity: The Planning Statement is silent on this critical issue. The Thames Water Comments on a comparable local application (25/02983/OUT) officially confirmed the "inability of the existing water network infrastructure to accommodate the needs of this development proposal," requiring network upgrades before occupation. This confirms that the necessary infrastructure is not currently available, placing an unacceptable risk of no/low water pressure on existing residents and directly contravening planning policy.

xvii) Health and Education Services: The financial contributions intended under S.106 for "schools and libraries infrastructure provision" are inadequate to address the systemic crisis. Local GP surgeries and dental practices (including those in the necessary Worcestershire catchment) are severely overstretched. The village primary school is small, constrained by its conservation area site, and most year groups are at capacity. A large, family-orientated development will exacerbate this crisis, forcing car-dependent journeys for essential services and education, thus undermining the sustainability claims.

xviii) Landscape and Heritage Concerns - AONB and Landscape Impact: The Planning Statement correctly notes that the site is outside the AONB but, given that the AONB is immediately to the south, it does lie within its setting. The development should be assessed with great weight given to conserving scenic beauty (NPPF Paragraphs 189 & 190). While the proposal includes a landscaped edge, the scale and design must be rigorously scrutinised to prevent the gradual, irreversible erosion of the AONB border and avoid coalescence with Broadway, which threatens to turn Willersey into an 'urbanised satellite.'

xix) While the site is distant from Listed buildings and the Willersey Conservation Area, and archaeological investigations found 'nothing

considered to be of archaeological significance', the application lacks a full Heritage Statement to address the site's setting adjacent to the Cotswold National Landscape and historic ridge and furrow fields.

xx) Village Identity, Noise, and Traffic Safety - -Unsustainable Location and Car Dependency: The village lacks the essential facilities (shops, medical services) to support 60 new dwellings, reinforcing a dependency on external services in Broadway or beyond. This conflicts directly with NPPF Paragraphs 8 and 104-110 and CDLP Policy INF3 (Sustainable Transport). The developer's proposed landscaped footway does not negate the fact that the walk to the nearest shop in Broadway (approx. 1.1 miles) is frequently unsafe due to flooding and requires crossing the dangerous A44 near a busy roundabout.

xxi) Highway Safety: While the Transport Statement (TS) concludes no 'severe impact' upon the safety or operation of the local highway network, the junction from the B4632 road to the site remains a local concern and is considered dangerous by the community, even with the single new road access point proposed.

xxii) Noise from Auto-Sleepers: The submitted Noise Assessment concludes acceptable internal and external noise levels can be achieved 'With suitable garden boundary treatment and standard double glazing alongside alternative ventilation'. Given that the adjacent Auto-Sleepers development (Ref 22/03534/FUL) will involve new production, office, and workshop buildings, and noise is an important consideration for 'high standards of amenity for future occupiers', the community maintains that the noise from the soon-to-be-extended industrial works has not been sufficiently interrogated to protect residential amenity.

xxiii) Open Space and Local Amenities (CDLP H1, INF7) - The proposal includes open space and mentions a LEAP play area and SUDS pond. While the S.106 obligations are set to secure Open space (including SUDS) provision and management, the specific nature of the amenity provision must be reconsidered to meet local need:

xxiv) Allotments Requested: Local engagement indicated that the community specifically requested allotments in meetings with the applicant, noting part of the land's previous use for this purpose. This valuable community amenity directly supports the GDBF's own 'Sustainable' core value and promotes local food security.

xxv) LEAP Redundancy: The community view is that the proposed LEAP play area is unnecessary, as the village already benefits from an existing, excellent recreation area nearby. Recommendation: To ensure the open space provision (Policy INF7) best serves the community, the incorporation of allotments, potentially in substitution for the proposed LEAP area, should be secured via the S.106 agreement.

xxvi) The development is supported in principle as a Local Plan allocation, and the design quality is acknowledged. However, until the severe, evidenced infrastructure deficiencies (foul sewerage and water supply), dangerous access junction and unresolved issues regarding noise and community-requested open space (allotments) are definitively resolved and secured, I believe the application should not be granted.

xxvii) As a result of the developments at Willow Green, Folly View, Ingles Court, St Winnifred's Gardens and Lions Gate, Willersey already has in excess of 125 new properties built without the existing infrastructure expanded to meet this extra capacity, such as roads, Sewage and fresh water, medical services, and schools.

xxviii) The light pollution caused by this development will obliterate the Village's rural character making it feel like an out of town illuminated car park.

xxix) I request CDC 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.

xxx) As a village we have no shops, no doctors ,two pubs and a garage. Our roads are a main link to Evesham, the A44 and further afield building more houses in a already crammed village will just put extra strain on local services, doctors schools etc .plus put more vehicles into an already busy road network via the village including cars lorries vans etc

xxxi) Overloaded sewage system.

xxxii) 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.

xxxiii) The NPPF, and PPG doubled the need for residential. CDC having only 1.8 years supply. The site is allocated for residential, in the existing Local oval Plan. so the principle is acceptable. My objection relates to the site not being efficiently used for residential, contrary to the NPPF. The residential density is about 28 dph whereas with the level of need, and the nature of the site 35 dph would be more appropriate, leading to up to 15 additional units, with 40% being affordable. In the context of the CDC preferred scenario achieving, nowhere near the residential need, it is essential to make effective use of land.

xxxiv) The current consultation on the NPPF emphasis the need to maximise density, and if it becomes operational would support refusal. There are no residential characteristics, adjoining the site, that would mean higher density would be inappropriate.

xxxv) Shortfalls to higher density include: Low use of terraces, being particularly absent from the large units. Roofspace of the 4 and 5 bedroom units, not using the roofspace for bedrooms, easily achievable with dormers, the result being narrower plots for the large units. Space standards, particularly for the larger units, massively in excess of the minimum standards. Incorporation of garages, that through experience will mostly become storage. There are adequate reasons to refuse this application. Failure to do so puts it question whether CDC is doing all that it can do, to narrow the gap between residential need, and projected supply.

8.3 **Chipping Campden Town Council**

8.3.1 'Chipping Campden Town Council objects to this application on the grounds of overdevelopment in a rural area lacking the necessary infrastructure. Our concerns are as follows:

Fresh Water Supply

8.3.2 Thames Water identify insufficient capacity in the existing network and request a condition preventing occupation until upgrades are complete or a phasing plan is agreed. This aligns with Parish Council concerns over low water pressure and capacity in the immediate and surrounding areas.

Allocation & Strategic Context

8.3.3 Wychavon DC confirm the site is allocated in the adopted Cotswold Local Plan. While principle is established, delivery conditions and mitigation remain

necessary to ensure acceptable impacts on infrastructure, amenity, and environment.

8.3.4 The proposal is contrary to several key policies in the Cotswold District Local Plan 2011-2031, including

- INF1 - Infrastructure Delivery - the area lacks sufficient infrastructure to support the proposed development, including utilities, healthcare and education*
- INF2 - Social and Community Infrastructure - there is inadequate provision of essential community services such as schools, libraries, and GP surgeries*
- INF3 - Sustainable Transport - the development would increase car dependency due to poor public transport and unsafe walking / cycling routes*
- INF4 - Highway Safety - the local road network is unsuitable for increased traffic, particularly HGVs, and poses safety risks*
- EN8 - Biodiversity & Biodiversity Net Gain (BNG) - at present, it is considered that the proposed site plans would facilitate habitat fragmentation, which is significant at site level, fails to establish and promote the conservation and enhancement of ecological networks*
- EN14 - Managing Flood Risk - the flood risk has been underestimated, contrary to local evidence.*

8.3.5 Also, with the additional separate application for 30 houses Land North of Folly View Broadway Road Willersey, 25/02983/OUT, this will only add further pressure on already inadequate infrastructure.

Summary

8.3.6 This application represents unsustainable overdevelopment in a rural area adjacent to the Cotswolds National Landscape. The local infrastructure-transport, utilities, education, health, and emergency services-is insufficient to support further growth.'

8.4 **Weston Sub Edge Parish Council**

8.4.1 'Weston Sub Edge Parish Council has reviewed the detailed responses submitted by Willersey Parish Council, Chipping Campden Town Council, and Gloucestershire Highways, and we fully support and endorse the concerns raised in those representations.'

8.4.2 We believe the cumulative issues presented across landscape, infrastructure, transport, sustainability, and policy compliance provide clear and substantial grounds for refusal.'

8.5 **CPRE - North Cotswolds District Committee**

8.5.1 'CPRE acknowledges that this site is identified within the Local Plan (W7A/WIL-EC1) as suitable for mixed use development. However, we share the concerns expressed by the Parish Council, local residents and consultees in relation to potential flood risk, noise, loss of amenity, biodiversity loss and lack of infrastructure.'

8.5.2 Representatives from CPRE visited the application site and walked the roads and public rights of way in the vicinity on 16 November 2025.'

Flood Risk

8.5.3 Serious concerns have been expressed by the Parish Council and local residents regarding the inadequate combined sewage and drainage system of Willersey and, in particular, the capacity of the pumping station at Badsey Lane, which is operated by Severn Trent Water. In a letter included in the applicant's Flood Risk Assessment (FRA), Severn Trent admits 'there is insufficient capacity ... to take the proposed foul flows'. (Appendix G7).

8.5.4 CPRE has seen photographs and reports of surface water flooding over several years, including those showing incidents where the capacity of drainage infrastructure has been overwhelmed, resulting in sewage flooding.'

8.5.5 The developers acknowledge the issues but have designed the proposal in preparation for flooding by raising floor levels, rather than exploring appropriate mitigation and remediation strategies which would benefit the wider community.'

8.5.6 While valuable, one attenuation pond is a very minimalist approach to managing the issues. It would not seem sufficient to prevent the excessive'

surface water run-off expected from the development onto the surrounding roads, which are already at risk of flooding. There are many 'nature based' SuDS available, which offer additional benefits, such as water purification, along with environmental benefits.

8.5.7 The developer acknowledges the risk and degree of rainwater sewage infiltration, but the application does not include a Rainfall Derived Infiltration and Inflow (RDII) projection. With accurate modelling, RDII can support specific infrastructure features including sewage system design and domestic infrastructure which will reduce and compensate for the increased surface water.

8.5.8 A positive FRA must show that the site is 'safe from current and future surface water flooding for the development's lifetime' and that there is 'no consequential risk elsewhere' . However, there is clear evidence that there is already pluvial and sewerage flooding with consequential risk for the wider community of Willersey.

8.5.9 A more realistic and relevant FRA would calculate the likely cumulative flood risk arising from this development, combined with the most recent development, the other application currently being considered and any other plots likely to be developed in the foreseeable future. This approach would be consistent with National Planning Policy Framework (NPPF) Para 170, which requires that development should not increase flood risk elsewhere and Para 171, that cumulative impacts should be considered.

8.5.10 Neither the CDC Strategic Flood Risk Assessment (SRFA) nor the Environment Agency provide up-to-date data to enable reliable climate based projections. However, the SFRA states 'this SFRA has considered that any site at existing surface water risk...will likely be at increased risk in the longer term' and this without considering the impact of increased runoff inherent in any development.

Noise

8.5.11 CPRE supports the view of the Parish Council and CDC's officer for Environmental Health - Noise - in requesting further assessment of the possible noise impact from the expansion of Willersey Business Park.

8.5.12 Page 2 of the Noise Evaluation states that 'Outdoor noise levels already exceed the desirable level for this residential development ... and may foreseeably do so increasingly'. The 2 metre acoustic barrier proposed is said to

be 'of limited value to the residential outside areas...and limited benefit to habitable rooms on the first floor at ... the nearest properties'.

Loss of Recreational Amenity

8.5.13 In the description of this site in CDC's Strategic Housing & Economic Land Availability Assessment (SHELAA) October 2021, it was noted that:

'There is a demand for allotments in Willersey. The Cotswold District Open Space & Recreation Study also identifies a shortage of public open space in Willersey. The allotment use has anecdotally diminished in recent years due to the threat of development - people have not wanted to invest time or money in allotments on this site, despite there being demand for allotments in Willersey.'

The loss of the allotments is of particular concern to the Parish Council, which emphasises that 'the loss of facility is a further erosion of community amenity which should be addressed' .

Lack of Infrastructure

8.5.14 CPRE is aware that 'Infrastructure First' is a prominent ambition of Cotswold District Council. Willersey has no immediate infrastructure such as a shop, bank, medical centre or secondary school. All of these are at least two miles away. Currently, the application does not comply with the requirements for sustainable development, as specified in the NPPF Para.8.

8.5.15 We also note that Thames Water has identified an inability of the existing water network infrastructure to accommodate the drinking water requirements of this development proposal.

Biodiversity Loss

8.5.16 The SHELAA analysis showed considerable existing biodiversity with numerous opportunities for preserving or increasing biodiversity on-site, including the dense hedges.

8.5.17 A number of significant issues around biodiversity net gain have been identified by CDC's Senior Biodiversity Officer, who recommends that a full review of the BNG information should be undertaken. CPRE would fully support this recommendation.

Conclusion

8.5.18 CPRE acknowledges that this site is identified within the Local Plan. However, we would ask the council to consider the cumulative impact of this development in the light of other recent developments and future applications within the village.

8.5.19 Of particular importance is the need for:

- *Comprehensive, strong flood prevention and mitigation strategies*
- *Thorough analysis of the infrastructure necessary to cope with the sewerage and pluvial flooding which can be expected, not just for this development, but including recent new builds and forthcoming applications.*
- *The need to preserve and enhance biodiversity, green infrastructure and recreational amenity.*
- *A better understanding of the degree of noise pollution and its potential impact on residents.'*

8.6 **Cotswolds National Landscape Board**

8.6.1 *' Having reviewed this application and for the reasons expanded upon within Annex 1 below, we wish to raise a holding objection to this application. In particular, the application contains inadequate assessment of landscape and visual matters to enable the Board to make a fully informed consultation response.*

8.6.2 *The Board considers that insufficient information has been submitted to demonstrate that the proposal would conserve and enhance the landscape and scenic beauty of the CNL and consequently the application does not accord with Cotswold Local Plan Policy EN5 as well as with Policies CE1 and CE13 of the CNL Management Plan. It would also conflict with the requirement of paragraph 189 of the National Planning Policy Framework that development within the setting of National Landscapes 'should be sensitively located and designed to avoid and minimise adverse impacts on the designated areas'.*

8.6.3 *The Board is particularly concerned about the lack of consideration of how the proposal would extend the built area of Willersey in views from the escarpment, these views being one of the CNL's 'special qualities'. This would potentially conflict with the Board's policies and guidance, in particular Section*

19.1 of the Cotswolds AONB Landscape Strategy and Guidelines which advises against the 'intrusion of expanded settlement fringes into the landscape including within the setting of the AONB'.

8.6.4 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.

8.6.5 The Board also considers that the evidence of need is not robust enough in the context of Policy CE15 of the CNL Management Plan 2025-2030 to justify the quantum of development over and above that for which the site is currently allocated within the Cotswold Local Plan (i.e. net 49 dwellings).

8.6.6 As explained in the Annex accompanying this response, this holding objection requests further information and clarification to be submitted by the applicant regarding housing need, landscape and visual and dark skies matters to enable the Board to fully assess any potential adverse impacts upon the landscape and scenic beauty of the National Landscape. The Board will be happy to provide a further assessment on likely effects once this information has been submitted by the applicant.

8.6.7 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.

8.6.8 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.

8.6.9 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.

8.6.10 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:

- Archaeological Desk Based Assessment
- Archaeological Evaluation
- Written Scheme of Investigation - Archaeology
- Flood Risk Assessment
- Noise Assessment
- Planning Statement
- Preliminary Ecological Appraisal
- Residential Travel Plan
- Soft Landscape Management and Maintenance Plan
- Soft Landscape Specification
- Transport Statement
- Design and Access Statement
- Biodiversity Net Gain Statement and metric calculations
- Landscape and Visual Impact Assessment

10. Officer's Assessment:

Background and Proposed Development

- 10.1 This application seeks full planning permission for the erection of 60 dwellings and associated works. The proposed scheme includes a mix of 1 and 2 storey dwellings, consisting of 8 bungalows and 52 two storey properties. In terms of housing mix, the proposed development comprises 36 open market dwellings and 24 affordable units. The proposed open market dwellings comprise 10 two bed units, 16 three bed units, 8 four bed units and 2 five bed units. The affordable units comprise 4 one bed maisonettes, 4 two bed bungalows, 10 two bed dwellings and 6 three bed dwellings.
- 10.2 The majority of the proposed 2 storey dwellings would be approximately 8-8.5m in height. The proposed 5 bed dwellings would be approximately 9m high.

The proposed bungalows would measure between approximately 6.2m and 6.7m in height. The proposed dwellings would consist of a mix of detached, semi-detached and terraced units.

- 10.3 The external walls of the proposed dwellings would be constructed using a mix of natural stone, reconstituted stone and roughcast render. The roofs of the proposed dwellings would be covered in artificial stone slate.
- 10.4 The proposed development also includes 19 garage buildings (providing 28 parking spaces), 106 allocated parking spaces and 15 visitor parking spaces.
- 10.5 Vehicular access to the proposed development would be via a new vehicular entrance onto the B4632 to the south of the application site. A pedestrian/cycle entrance would also be located in the south-western corner of the site and would open onto the aforementioned highway. It is also proposed to create new footways and upgrade existing footways along a stretch of the B4632 extending from the south-western corner of the application site to an existing mini-roundabout located in the village of Willersey. A new pedestrian crossing across the B4632 is also proposed as part of the highway works. The proposed highway works would extend for approximately 125m.
- 10.6 In addition, it is proposed to create a new 40mph zone to the east of the existing 30mph zone lying on the B4632 to the east of the application site. The proposed speed limit change would provide a more gradual transition in vehicle speeds along the B4632 as opposed to the existing transition which goes directly from 60mph to 30mph.
- 10.7 An equipped children's play area is to be located in the northern part of the application site. An area of public open space and an attenuation basin are to be located alongside the play area.

(a) Residential Development in a Development Boundary

- 10.8 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.

10.9 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 Summer 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.

10.10 The majority of the application site is located within Willersey Development Boundary. Development within such locations is covered by the following Local Plan Policy:

10.11 Policy DS2 Development Within Development Boundaries

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

10.12 The erection of residential development within Willersey Development Boundary is therefore acceptable in principle. In addition to Policy DS2, the area of the site within the development boundary is also allocated for mixed use development in the Local Plan:

10.13 Policy S19 Allocated mixed use development site

W_7A/WIL_E1C - Land north of B4632 and east of employment estate (49 dwellings net and 1.97 hectares for B1, B2 and/or B8 Use Class employment land)

10.14 The area within the development boundary is therefore deemed to be suitable, in principle, for both employment and residential uses.

10.15 In addition, the draft NPPF states:

S4: Principle of development within settlements

'1. Development proposals within settlements 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.'

10.16 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 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.

10.17 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.

- 10.18 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 DS2 is out-of-date at the present time and that paragraph 11 is engaged in such circumstances. Notwithstanding this, it is considered that a reasonable degree of weight can still be attributed to Policy DS2 at the current time as it is considered to accord with the aspirations of the NPPF which seek to promote sustainable development in rural areas, support housing that reflects local needs and enhance or maintain the vitality of rural communities.
- 10.19 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 could 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.
- 10.20 With regard to the application site itself, an assessment of the site is included in the Council's Strategic Housing and Economic Land Availability Assessment Update October 2021 (SHELAA). The site is included under site reference: Land north of B4632 and east of employment estate (ref: W7A). The SHELAA states the following:

'Description

10.20.1 The White Report (2014) provided a description for the parcel. This is reproduced below and is considered to still be relevant to the parcel:

10.20.2 The site lies on the northern side of the settlements, where it abuts Willersey Business Park to the west and open pastoral farmland to the east. It consists of very gently sloping pastoral land falling north, in fenced enclosures with a series of dilapidated buildings and rough storage areas on its southern boundary, where a tall hedge separates it from the B4632. Its northern boundary is fenced, with views over the flat pasture fields to the low vegetation on the dismantled railway, which, together with extensive woodland, effectively screens all views from the north. There is a hedged track along the eastern boundary, with a PRow running parallel a few metres away in the adjoining pasture field'.

Summary

10.20.3 The majority of this site is already allocated for mixed use development in the adopted Local Plan. This area continues to be developable. The part of the site to the north of the existing Local Plan site allocation would be an extension to the site allocation. This land is part of the same field that is already allocated in the Local Plan. It would make best use of this land and historic field boundaries if the whole of this field were brought forward for development, rather than leaving a remnant part of an agricultural field which may be difficult to cultivate.

Recommendation

10.20.4 The existing Local Plan site allocation should remain allocated in the Local Plan. The northwards extension to the site is a candidate for further consideration for allocation within the Local Plan.

10.20.5 Indicative capacity 57 houses (based on the density multiplier assumption) and 2ha of B1, B2 and/or B8 use class employment land as an extension to Willersey Industrial Estate.'

10.21 It is evident that the SHELAA is supportive of the use of the land for residential purposes. In addition, it recommends a higher number of dwellings than that set out in the Local Plan.

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 had 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 current site (which has a Local Plan indicative guide of 49 dwellings) and a garage/workshop site in the centre of the village with an indicative guide of 5 dwellings. In addition, it is also noted that Planning and Licensing Committee has resolved to permit an Outline planning application for 30 dwellings in connection with land lying to the north of Folly View on the western edge of the village (25/02983/OUT). The aforementioned site is located at the opposite end of the village to this application site. 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 60 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 application site is located approximately 400m from the village centre and the entrance to the employment estate and 500m from the village's primary school. 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.

10.24 With regard to the attractiveness and safety of the available routes, it is noted that the applicant is proposing to upgrade existing footways between the application site and the mini-roundabout located at the northern end of Main Street. A tactile pedestrian crossing and changes to speed limits are also proposed. The highway improvements would provide a safe pedestrian route from the site to services and facilities in the village. In addition, the pedestrian/cycle route is also relatively flat. It is considered, subject to the completion of the aforementioned highway works, that the proposed development would be provided with good connectivity to existing services and facilities for pedestrians and cyclists and would 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. 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 also 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'*. The proposal is also considered to accord with the aspirations of draft NPPF Policy CC2 which states that development should *'support good access to facilities to limit the need to travel...'*

- 10.25 In light of the above and having regard to its rural location and its allocation for housing in the Local Plan, 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 and the Primary Planning Area have 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 this application. Concerns raised by objectors regarding drainage infrastructure are noted and will be addressed in detail later in this report.

- 10.26 It is considered that the erection of 60 dwellings on this site would not represent a disproportionate increase in the size of the settlement, especially in light of the allocation of the site for new housing in the Local Plan.
- 10.27 With regard to the cumulative impact of this proposal and the 30 dwellings proposed on the land to the north of Folly View, 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 define its character as at present.
- 10.28 In terms of infrastructure, GCC Community Infrastructure considers that the Primary Planning Area has capacity to accommodate the 30 dwelling scheme in addition to the 60 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 assessing the 2 current applications for residential development, it is considered that the additional 41 dwellings arising from the additional units on the current application site and the Folly View 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

10.29 The following Local Plan policies are considered applicable to this application:

10.30 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.'*

10.31 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.'*

10.32 With regard to housing mix, this application seeks to provide a range of 2, 3, 4 and 5 bed dwellings. Of the 60 dwellings, 50 would be 3 bed and under. In addition, the proposed dwellings would be arranged in a mix of detached, semi-detached and terraced units. It is considered that the proposed scheme would provide a reasonable number of smaller and medium sized dwellings across both the affordable and open market elements of the development. The proposal is therefore considered 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,*' in accordance with Local Plan Policy H1. In addition, the floorspace of the proposed dwellings meets minimum floorspace standards as required by the aforementioned policy.

- 10.33 With regard to affordable housing, the applicant is seeking to provide 4 one bed maisonettes, 4 two bed bungalows, 10 two bed dwellings and 6 three bed dwellings. The proposed tenure mix would include 7 units for affordable rent, 10 for social rent and 7 for affordable sale. The aforementioned mix accords with the recommendations set out by the Council's Housing Section. The Council's Homeseeker register indicates that 55 persons were registered for affordable housing in Willersey parish in May 2026. The current proposal would help to address existing housing needs within the parish and is considered to be in accordance with Local Plan Policy H2. The delivery of affordable housing is considered to carry significant weight.
- 10.34 It is considered that the affordable units are distributed across the site in a reasonable manner and that the design of the respective dwellings is consistent with that of the open market units. The scheme is therefore considered to result in a tenure blind form of development.
- 10.35 The applicant is seeking to provide 3 self-build/custom build serviced plots. This is in accordance with the requirements of Local Plan Policy H2.
- 10.36 The provision of affordable housing and self-build/custom build serviced plots will be secured through a S106 legal agreement.

(c) Design and Impact on the Character and Appearance of the Area

- 10.37 The application site occupies a relatively flat and open area of agricultural land located adjacent to the north-eastern edge of the village. The majority of the site is set to grass and is used for grazing. However, a section of the southern part of the site (approximately 0.4 hectares in size) is overgrown with undergrowth and other vegetation. The area in question has been used as allotments in the past. It also contains a redundant corrugated metal shed. The eastern and southern boundaries of the site are defined by a line of trees and understorey vegetation.
- 10.38 The site is not subject to any specific landscape designation. However, the northern boundary of the Cotswolds National Landscape (CNL) (formerly known as the Cotswolds Area of Outstanding Natural Beauty) runs along the southern side of the B4632 to the south of the application site. Whilst the site is located outside the CNL, 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).

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

10.40 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 and enhancement of multi-functioning 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) states:

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.'*

10.44 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'*.

10.45 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.'*

10.46 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)'

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

10.48 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.'

10.49 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.'*

10.50 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.'

10.51 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. '*

10.52 Draft NPPF Policy N4: Protected Landscapes states that '*...Substantial weight should be placed on the importance of conserving and enhancing the natural beauty of these areas.*'

10.53 The application site occupies a group of agricultural fields located to the east of the existing settlement. A strip of agricultural land is located between the western boundary of the application site and existing village development to the west. The eastern edge of the settlement is currently defined by an employment estate and a dwelling. Planning permission was granted in 2024 (22/03534/FUL) for the creation of new employment development on the land lying between the application site and the existing employment estate/dwelling. The aforementioned permission has yet to be implemented but remains extant at the present time.

10.54 The southern boundary of the application site extends along the northern side of the B4632. A post war residential housing estate (Ley Orchard) is located to the south of the aforementioned highway. The eastern and northern boundaries of the application site adjoin agricultural fields. A line of trees and understorey vegetation extends along the aforementioned boundaries. A tree lined former railway line runs in a south-west to north-east direction to the north of the application site. It lies approximately 25m from the application site at its closest point.

10.55 With regard to public views of the site, the principal public vantage points are from the B4632 to the south and Public Right of Way HWY4 to the east. The latter runs in a north-south direction through the field lying adjacent to the eastern boundary of the application site. It is located approximately 35m from the application site.

10.56 Views of the site from the B4632 are largely screened by existing roadside vegetation. The principal view through the site from the aforementioned road is from the existing site access. However, it is noted that the current view is largely limited to existing vegetation and a metal shed, which restricts views

through the site to the north. With regard to the Public Right of Way, views of the site are screened to a certain extent by existing boundary vegetation, although this vegetation does become more sparse along the northern part of the site's eastern boundary. The existing employment estate also form a backdrop to views experienced from the Public Right of Way. It is noted that the field to the east of the application site is characterised by pronounced ridge and furrow. This is less evident in the application site, although there is some evidence of such an agricultural practice in the northern part of the site, albeit less pronounced than on the field to the east.

10.57 A landscape assessment of the site is included in the 2021 SHELAA. It states:

'Landscape Sensitivity Evaluation: Medium/Low Justification:

10.57.1 The landscape sensitivity given to the parcel as part of its inclusion within the 'Study of land surrounding Key Settlements in Cotswold District Update' (Cotswold District Council and White Consultants, October 2014) report was Medium/Low. The justification provided for this rating is reproduced below and is still considered to be an appropriate justification for the parcels landscape sensitivity:

10.57.2 'The site is susceptible to housing development by reason of its current land use, but this has little time-depth. It is of low susceptibility by reason of its well-screened location and proximity to existing economic development, outside the settlement but well-screened within the wider landscape. The AONB boundary is the southern edge of the B4632, on the northern edge of which a tall hedge provides screening at present, although there may be some limited views into the site from first floor windows of houses opposite. Dense hedges on nearby parallel field boundaries screen views in from traffic approaching the settlement from the east, but care would be required to ensure that building heights were no more than those of buildings in the adjoining Business Park, to avoid any significant visibility from the scarp slope to the south east. Retention of part of the strongly vegetated southern boundary is recommended. The inclusion of the land to the north does not change the landscape sensitivity of the parcel. This is because the land shares the same characteristics as the existing parcel and creates a logical addition to the parcel up to the dismantled railway. Any development would need to be delivered within a robust landscape framework that retains and supplements the existing boundary vegetation.'

10.58 As part of the application process and in response to comments made by bodies such as the Cotswolds National Landscape Board, the applicant has submitted a Landscape and Visual Impact Assessment (LVIA) with this application. The

LVIA has assessed the site from a number of vantage points, including higher land within the CNL. The Non-Technical Summary of the LVIA states:

'1.6. The overall weighted landscape sensitivity of the site and surrounding landscape has been assessed as high. This is largely due to forming part of the setting of the National Landscape, whilst the site itself has few valued landscape components other than the open grassed field forming the settlement edge. The introduction of residential properties into a grassed field will see a change in character. The magnitude of landscape impact has been assessed as medium as there will be a loss of grassland, but areas of grassland will remain to the north, supplemented with significant tree, hedgerow and scrub planting. The introduction of new residential development may be prominent for a limited number of observers but is not considered uncharacteristic when set within the attributes of the receiving landscape.'

'1.7. Following the loss of the scrub vegetation at the south of the site, once the native hedgerow within the highway verge has matured, this will enhance the setting and approach and create a more cohesive road corridor on the approach to Willersey. The residential development will filter the views of the industrial park and the combination of the more permeable residential layout, intertwined with a landscape framework, with trees and open spaces, it will create a more appropriate rural transition than the current industrial edge. Enhancements of the boundary vegetation will also mitigate views and as a result, the residual impacts would be reduced and the residual impact on the landscape character would be moderate.'

10.59 The Case Officer has viewed the site from a number of public vantage points including the Public Right of Way to the east, and Public Rights of Way within the CNL. It is considered that the findings of the LVIA are reasonable.

10.60 The current proposal would result in the removal of the existing roadside boundary vegetation. As such, the proposal would open up views of the site from the B4632 to the immediate south of the site. Notwithstanding this, existing roadside vegetation along the northern side of the road to the east of the site would continue to provide a significant degree of screening when approaching the village from the east. Whilst the proposal would be visible from the B4632, the level of visibility would largely be restricted to a short section of the aforementioned highway and would be seen predominantly by motorists rather than more sensitive receptors such as pedestrians.

10.61 In order to lessen the visual impact of built development on the B4632, the applicant is proposing to set the new dwellings back approximately 10-15m

from the highway and introduce soft landscaping to their front. In light of the relatively short section of road that would be affected by the proposal, combined with the presence of existing housing to the south of the B4632 (which is visible on the eastern approach into the settlement), and the set back position of the proposed dwellings, it is considered that the changes to the southern boundary of the site would result in a minor change to the character and appearance of the area and to the setting of the CNL. In relation to the latter, it is noted that the post war housing estate located to the immediate south of the application site is located within the CNL. The character and appearance of the adjacent designated landscape is therefore already heavily influenced by residential development.

10.62 With regard to views from the Public Right of Way to the east of the application site, it is noted that the existing line of trees/understorey vegetation would provide an element of screening of the lower parts of the proposed development. However, the upper storeys and roofscape would be visible above existing landscaping. Whilst buildings on the existing employment estate form a backdrop to the site when viewed from the Public Right of Way, the existing buildings are relatively modest in size and are not unduly conspicuous or obtrusive. As a result, it is considered that the proposed scheme would alter the relationship of the application site with the landscape to its east. The proposal would therefore increase the visual presence of built development when viewed from the Public Right of Way. However, it is also necessary to acknowledge that the site has been allocated for residential development in the Local Plan and it is therefore a location where the introduction of new housing is considered to be acceptable in principle. It is therefore accepted that the site is one where development can potentially be introduced without causing an unacceptable level of harm to the character and appearance of the area and the setting of the CNL. In the case of the current scheme, the applicant has sought to introduce a range of building heights and designs along the eastern edge of the site. The applicant has also avoided the introduction of development into the northernmost part of the site, which is more exposed when viewed from the east. New tree planting is also proposed along the site's eastern boundary. In addition, the number of dwellings addressing the site's eastern boundary is limited, with only 10-11 dwellings out of the proposed 60 dwellings lying along the site's eastern edge. In this respect, the proposal is considered not to result in a wall of development along the eastern part of the site. Whilst the proposal will change the character and appearance of the landscape lying adjacent to the eastern edge of the settlement, it is considered that the proposed change is respectful of existing village development and that it would be seen in context with the existing settlement. As a consequence, the proposal is considered not

to have a not have a significant detrimental impact on the natural and historic landscape lying to the east of the application site.

- 10.63 With regard to more distant views, it is noted that there are a network of Public Rights of Way extending across the rising land forming part of Willersey Hill and around the village of Saintbury to the south-east of the application site. The aforementioned routes are located within the CNL. Views of the site from the hillside are limited by a mix of vegetation, topography and distance. Where the site and north-eastern part of the village are visible, the site forms a small component of a wider landscape view and is seen in context with existing village development. It is considered that the proposed development would not have an adverse impact on setting, character or appearance of the CNL. In addition, due to the proximity of the site to existing village development, the proposal is considered not to have an adverse impact on dark skies.
- 10.64 With regard to the impact of the proposal on the CNL in general, the proposed development would have a visual and physical connection with the existing Principal Settlement. It would not therefore appear as a standalone development in the open countryside. Existing housing is located to the south of the site and employment development to its west. The site is therefore located in an area which has a character and appearance which is already heavily influenced by existing built development. In addition, the site does not extend further eastwards into the countryside than the existing edge of residential development lying to the south of the application site. There are also limited views available of the site from the CNL. It is considered that the proposed development can be undertaken without causing harm to the setting, character and appearance of the CNL and that it would not conflict with Local Plan Policies EN4 and EN5, guidance in Section 15 of the NPPF, policies in the Cotswolds National Landscape Management Plan, and the requirement to further the purpose of conserving and enhancing the natural beauty of the National Landscape.
- 10.65 With regard to design, the applicant is pursuing a traditional design approach. The size, scale, proportions, materials and detailing of the proposed dwellings are consistent with the appearance of many other housing developments that have been erected across the District in recent years. It is also considered that the scheme respects the size, scale, design and existing housing types that are seen with the village of Willersey. It is therefore considered that the design approach is appropriate for the location and that it respects local character and distinctiveness in accordance with Local Plan Policy EN2 and the Cotswold Design Code.

10.66 In terms of site layout, the scheme is considered to respond in an acceptable manner to what is a linear site. The creation of the site entrance in the south-eastern corner of the site is necessary to ensure that adequate distance is achieved between the proposed entrance and the new entrance approved recently as part of the industrial estate extension to the west. The positioning of the internal estate road along the western boundary of the site also ensures that a buffer is provided between the industrial units approved to the west and new housing. Within the proposed estate, new housing would address the internal road layout. New tree planting and green space is also provided as part of the layout. An area of land to the north of the proposed housing would also be set aside for Public Open Space and a Local Equipped Area of Play. The introduction of east facing dwellings along the eastern boundary of the site also means that the development would not turn its back on the adjacent countryside. It would also ensure that back gardens/close boarded fences do not form a feature along the site's eastern boundary. In addition, following discussions with Officers, the applicant has removed an enclosed communal car parking area initially proposed in the centre of the development with a more open, and better surveilled parking area. It is therefore considered that the layout of the scheme is acceptable and the revisions address a number of comments raised by the Designing Out Crime Officer. It is considered that the scheme has been reasonably designed to prevent crime and disorder and to 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.'

10.67 With regard to energy efficiency, the proposed scheme seeks to adopt a fabric first approach which would include increased insulation, high efficiency glazing, electric vehicle charging, Air Source Heat Pumps and rainwater harvesting. It is considered that the proposal reasonably addresses the impact of climate change.

10.68 It is considered that the proposal accords with Local Plan Policy EN2 and guidance in the Cotswold Design Code.

(d) Access and Highway Safety

10.69 The proposed development would be served by a new vehicular access which would be located in the southern boundary of the application site. It would open onto the B4632. The aforementioned highway is subject to a 30mph speed limit where it passes the application site. A new dedicated pedestrian/cycle entrance would also be created in the south-western corner of the application site. It would also open onto the B4632. The new pedestrian/cycle entrance would connect into the as yet unimplemented employment site entrance approved under permission 22/03534/FUL. New and upgraded footways are also proposed along the stretch of the B4632 extending from the application site to the existing mini-roundabout located in the village, which is located approximately 125m from the development site. A new pedestrian crossing across the B4632 is also proposed as part of the highway improvement works. In addition, it is proposed to create a new 40mph zone to the east of the existing 30mph zone lying on the B4632 to the east of the application site. The proposed speed limit change would provide a more gradual transition in vehicle speeds along the B4632 as opposed to the existing transition which goes directly from 60mph to 30mph.

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

10.71 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.

10.72 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.*'

10.73 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.

10.74 With regard to the proposed vehicular entrance, it would be located on the outside of a bend in the existing road. An Automated Traffic Count undertaken in January 2025 recorded 85th percentile speeds of 36.6mph westbound and 37.4mph eastbound along the stretch of road adjacent to the site entrance. Based on this data, the requisite visibility splays would be 69.1m to the east and 71.4m to the west. The applicant has submitted a visibility splay plan which demonstrates that the aforementioned distances can be achieved. The bend in the road does not prejudice visibility in this instance.

10.75 With regard to traffic generation, the TS states that the proposed development would generate 28 vehicular trips during the AM peak period and 26 vehicular trips during the PM peak period. It is considered that the level of traffic generated by the proposed development would not have a significant impact on the operation of the local highway network, and would not be severe in the context of paragraph 116 of the NPPF.

10.76 The TS also includes details relating to junction visibility within the development as well as swept path analysis plans showing that the internal road layout and the site entrance can safely accommodate passing vehicles and larger service vehicles.

10.77 The proposed scheme would provide parking for 149 vehicles which is considered to be acceptable for the size and form of development being proposed. Each property has sufficient space to provide secure cycle storage.

- 10.78 Gloucestershire County Council (GCC) Highways have assessed the application and raises no objection to the proposal.
- 10.79 It is considered that the proposed development can be undertaken without having an adverse impact on highway safety in accordance with Local Plan Policies INF3, INF4 and INF5 and Section 9 of the NPPF.

(e) Flooding and Drainage

- 10.80 The application site is located within Flood Zone 1, which is the lowest designation of flood zone and one in which new residential development can be acceptable in principle.
- 10.81 This application is accompanied by a Flood Risk Assessment (FRA). The FRA has identified the presence of pooling in areas towards the centre of the site where ridge and furrow is present. The depth of pooling can be approximately 0.2m. The FRA states:

10.81.1 'Following review of the topographical survey and conducting a site walkover, it is reasonable to ascertain these areas of risk in the centre of the site with depressions in the topography, characteristic of ridge and furrow features. Therefore, the areas of surface water risk are arguably localised flooding, as opposed to being a wider flow route.'

- 10.82 The FRA identifies that on-site infiltration would not be practicable in this instance. It therefore recommends the use of on-site attenuation, which would also utilise a drainage ditch approved as part of the adjacent industrial estate development:

10.82.1 'It is proposed to introduce an entirely new gravity stormwater system which will direct flows to an attenuation basin, sufficiently sized to store the volume of runoff for up to a 1 in 100 year event plus 40% climate change allowance, which will reduce risk of flooding downstream. Runoff will also be directed to conveyance swales and lined permeable paving providing at source treatment and promoting a SuDS Management Train.'

10.82.2 'The overall discharge rate from site will be restricted to the 11.4 l/s for all return period storms.'

- 10.83 The proposed scheme has been assessed by GCC Lead Local Flood Authority (LLFA) in its role as a statutory consultee for surface water drainage matters.

Following discussions with the applicant, the LLFA confirms that the proposed surface water drainage proposals are acceptable and it raises no objection.

- 10.84 It is considered that the proposed development can be undertaken without causing an unacceptable risk of flooding or surface drainage problems in accordance with Local Plan Policy EN14 and guidance in Section 14 of the NPPF.
- 10.85 With regard to foul drainage, the applicant is seeking to connect to the existing Severn Trent Water network. It is noted that a number of concerns have been raised by local residents about the capacity of the existing drainage network. The relevant body for dealing with foul water in the site area is Severn Trent Water (STW). It 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:

10.85.1 '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.'

10.85.2 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.'

10.85.3 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.'

10.85.4 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.'

10.85.5 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.'

10.86 In light of the comments from Severn Trent Water, the following condition is recommended. The condition is the same as that recommended in connection with the application for 30 dwellings at Folly View in Willersey (25/02983/FUL) which was considered recently by Planning and Licensing Committee:

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.*

10.87 The matter of foul drainage was also covered as part of an appeal relating to the erection of 25 dwellings on a site 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.

10.88 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.'

10.89 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. The condition now recommended by Officers is consistent with that set out by the Inspector in the aforementioned appeal case.

10.90 In addition to the above, Officers have also had regard to the following when reaching this recommendation:

10.91 Paragraph 201 of the NPPF 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.'

10.92 It is considered that the proposed development can be undertaken in a manner that would not have an adverse impact on foul drainage and in accordance with Local Plan Policy INF8.

(f) Impact on Residential Amenity

10.93 Each of the proposed dwellings would have an internal floorspace in excess of minimum floorspace standards in accordance with Local Plan Policy H1.

10.94 The proposed dwellings would be positioned and orientated in a manner that would provide future occupants with acceptable levels of light and privacy and that would avoid instances of overbearing impact. In addition, each dwelling would be provided with adequate levels of outdoor amenity space in accordance with the Cotswold Design Code.

10.95 The proposed scheme makes provision for a children's play area and recreation space. It is therefore considered that the proposal provides adequate public open space.

10.96 The application site is located approximately 50m from an existing employment estate. However, it is noted that permission exists for the creation of new employment development on the strip of land lying between the existing employment estate and the housing now proposed. As part of the aforementioned permission, conditions were attached covering noise and operating hours. In addition, an operational hours working directive was also added as a condition which limits the type of activities that can be undertaken outside the hours of 0700-1800 Monday to Friday and 0700-1400 on Saturdays. Restrictions included a need for doors to remain closed, no deliveries and no machinery to be operated outside of buildings. It is also of note that the Local Plan allocates the land for a mix of employment and residential uses, which indicates that such uses can co-exist on the allocated site as a whole

10.97 This application is accompanied by a Noise Assessment which has been assessed by the Council's Noise Officers. The aforementioned Officers are satisfied that the proposed relationship between the residential and employment sites is acceptable. However, it is recommended that mechanical ventilation is installed in the first floor habitable rooms of 7 properties that have front or rear windows facing the approved employment site. This will provide an additional means of ventilation to the occupiers of the respective properties should the opening of a window cause undue disturbance.

10.98 The proposal is considered to accord with Local Plan Policies EN2, EN15 and INF2 and guidance in the Cotswold Design Code.

(g) Biodiversity

10.99 The application site occupies an area of agricultural land which is covered in predominantly, but which also includes area of undergrowth, trees and hedgerows. Agricultural fields are located to its north, east and west.

10.100 This application is accompanied by a Preliminary Ecological Appraisal (PEA). A dusk emergence bat survey has also been undertaken as part of the application submission.

10.101 The Biodiversity Officer provided the following initial response to this proposal:

' Habitats -

10.101.1 The site contains three hedgerows (H1, H2 and H3). It appears that one or more of these hedgerows may fit the criteria for priority hedgerows under Section 41 of the NERC Act 2006. The PEA does not define whether any of these hedgerows satisfy this criteria to be considered as a priority habitat and this should be confirmed.

10.101.2 Also, it is noted that the hedgerows H2 and H3 are to be lost. In consideration of the site plans, it is unclear why H2 cannot be retained and enhanced. Therefore, this should be clarified as at present, insufficient information has been provided to justify its loss.

Amphibians –

10.101.3 The site is within the green impact risk zone as per the Great Crested Newt District Licensing Scheme, with no ponds within 250m of the site. The ponds present within 250-500m of the site are all separated by considerable barriers and built form and in this instance, I agree with the assessment of the PEA that GCN are unlikely to be impacted by the development. The site may support common amphibians, and the report recommends that precautionary working measures to safeguard common amphibians can be included within a Construction Ecological Management Plan (CEMP). The CEMP can be secured by condition once all other biodiversity issues are resolved.

Bats -

10.101.4 The timber framed building (B2) was assessed to have low suitability for roosting bats, and a further emergence survey was undertaken which did not record any roosting bats. It is noted that trees within the woodland will be removed, and some of these trees were classified as PRFI. Therefore, precautionary methods are required for works to these trees.

10.101.5 Static surveys for bats were undertaken, which recorded at least 8 species using the site with the largest amount of activity attributed to Common Pipistrelle bats. Other notable species recorded using the site were Lesser Horseshoe, Noctule, Serotine and Leisler's although the volume of activity attributed to these species was lower than that of the Common Pipistrelle.

10.101.6 The PEA recommends that edge habitats should be retained to reduce severance of bat habitats, and lighting should be designed to ensure dark corridors remain. The proposed site and BNG plans indicate that the southern boundary is to comprise modified grassland, with a complete loss of the linear and woodland habitat features to facilitate development. It appears that this will constitute severance of the commuting and foraging habitat in this area of the site, with no habitat created to mitigate this loss. This should be addressed, and habitat features should be created along the southern boundary to mitigate for the loss of habitat and to retain connectivity for foraging and commuting bats which have been recorded as using the site during the submitted surveys. The BCT and ILP guidance refers to the potential for offences under the legislation which affords bats and their roosts protection by the severance of key bat flightpaths

Birds -

10.101.7 The assessments and recommendations pertaining to birds are considered sufficient, and recent site photos demonstrate that the grassland on site is unlikely to be suitable for ground nesting birds.

Reptiles -

10.101.8 Reptile surveys undertaken recorded a peak count of one adult grass snake and one adult slowworm, with two juvenile grass snakes also recorded. The PEA recommends that a reptile mitigation strategy and management plan will be required. I agree with this recommendation and the strategy should be secured by condition once all other biodiversity issues are resolved.

Dormice -

10.101.9 *Suitable habitats for dormice have been identified on site within the PEA, although it is stated that no impacts to the species are considered likely. Given that full surveys for dormice were not undertaken and the site contains habitat which are suitable for dormice, it is my view that precautionary working methods for dormice should be included within a CEMP.*

Riparian mammals -

10.101.10 *I agree with the assessments and recommendations pertaining to otters and water voles, and do not anticipate any impacts to these species.*

Other species -

10.101.11 *The assessments and recommendations pertaining to hedgehogs and invasive non-native species are sufficient.'*

10.101.12 In response to the above, the applicant has provided additional information, to which the Biodiversity Officer has advised:

'Hedgerows

10.101.13 *I note the justification for the loss of hedgerows which have now been confirmed to meet the criteria of 'priority habitat' under Section 41 of the Natural Environment and Rural Communities (NERC) Act, 2006. However, it should be clarified which hedgerows/how much hedgerow will be created as mitigation and compensation for priority habitat hedgerow loss, as in instances where a loss cannot be avoided, the applicant must demonstrate that the mitigation hierarchy has been followed (paragraph 193 of the NPPF). Furthermore, principle 2 in the Statutory Biodiversity Metric User Guide (July 2025) states the following: "The use of this biodiversity metric does not override existing biodiversity protections, statutory obligations, policy requirements, ecological mitigation hierarchy or any other requirements." Any compensation required to mitigate potential impacts to these priority hedgerows must be shown to be 'additional' to the minimum 10% net gain requirement.*

Bats

10.101.14 *I acknowledge that the revised plans now demonstrate a species-rich native hedgerow and additional grassland enhancement along the southern boundary of the site. I accept these proposals in principle, assuming that adequate information can be provided within the HMMP to demonstrate*

that the hedgerow and grassland can be managed for the benefit of biodiversity including bats and will not be subjected to harsh and restrictive management for amenity reasons which would lower the overall ecological value.'

10.102 At the time of writing this report, additional information is still awaited in relation to the hedgerow matter. However, it anticipated that this is a matter that can be addressed following further discussion. In addition, it is considered that the proposal can be undertaken in a manner that would not otherwise have an adverse impact on protected species or their habitat in accordance with Local Plan Policy EN8 and section 15 of the NPPF. An update will be provided to Committee Members at the Committee meeting.

10.103 With regard to Biodiversity Net Gain (BNG), the applicant is seeking to deliver BNG partly on-site and partly off-site. The development is unlikely to be able to deliver the requisite 10% enhancement solely through on-site measures. The applicant is therefore proposing to provide additional enhancements on an area of land in their ownership which lies to the north-west of the railway line. The area in question is currently used for arable purposes and measures approximately 9.8 hectares in size. An area of the aforementioned land measuring approximately 4.2 hectares would be used for the creation of an orchard, neutral grassland and mixed native scrubland. At the present time, the Biodiversity Officer has requested further information and clarification regarding metric calculations. It is considered that further details are required in order for Officers to be reasonably satisfied that 10% BNG can be secured. Members will be provided with an update on this matter at the Committee meeting.

Other Matters

10.104 With regard to trees, the Tree Officer states:

10.104.1 'The proposal results in the removal of moderate and low quality trees to the south of the site. Individually the trees and groups offer little amenity value, however as a group there is some screening and amenity value.'

10.104.2 The hedgerow running to the east of the site is proposed to be retained and enhanced with new planting.

10.104.3 The western boundary of the site will be enhanced following conditioning of a landscape plan for 22/03534/FUL.

10.104.4 No specific tree or hedge protection measures are required.

10.104.5 Removed trees will be adequately compensated for if soft landscaping is delivered as per landscape plan drawing no. PR124834 11A Sheets 1-4. The proposed scheme consists of a good mix of native and ornamental species and will result in a significant canopy cover increase. The soft landscape specification details planting methods and aftercare. Trees which fail to establish must be replaced for the duration of the management period.'

10.105 It is considered that the proposed development is in accordance with Local Plan Policy EN7.

10.106 It is noted that the northern part of the site includes ridge and furrow. Such a feature reveals evidence of mediaeval farming practises and can constitute a non-designated heritage asset. The proposed development would result in the loss of the aforementioned asset. Local Plan Policy EN12 states that '*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.*' 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.*' In this instance, it is noted that the site is allocated for housing/employment development in the Local Plan. The introduction of development onto the site has therefore already been established in principle. In addition, the ridge and furrow on the site is less pronounced than the ridge and furrow that is present on the fields which are located to the east of the application site. Larger and more visually prominent ridge and furrow will remain on the fields to the east, thereby ensuring that the ridge and furrow characteristics of the landscape to the north-east of the settlement will remain. The loss of the area in question on the application site is therefore considered not to significantly erode the overall significance of the ridge and furrow that lies to the north-east of the village. In light of the site allocation, the modest contribution the existing ridge and furrow makes to the overall level of ridge and furrow lying adjacent to the settlement and the fact that extensive areas of ridge and furrow will remain, it is considered that there is a reasonable justification for the loss of the existing ridge and furrow on the site having regard to the aforementioned policy and guidance.

10.107 With regard to archaeology, GCC Archaeology has advised:

10.107.1 *'I advise that I have checked the proposed development site against the County Historic Environment Record, and there is no significant archaeology known at this location. The site was subject to archaeological evaluation in 2018, with negative results.'*

10.107.2 *'In my view there is a low risk that 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.'*

10.108 With regard to climate change and energy efficiency, the applicant states *'the site will achieve a total reduction in regulated CO2 emissions in order to reach the Target Emission Rate (TER) outlined in Approved Document Part L (AD L) 2023 through fabric-first, demand reduction and low carbon and renewable energy measures and will successfully deliver the minimum onsite reduction target in regulated CO2 emissions over AD L 2023 for domestic elements of the site.'* The measures proposed include features such as energy efficient building fabric and insulation, high efficiency glazing, air source heat pumps, electric vehicle charging and rainwater butts. It is considered that the proposed scheme reasonably addresses issues arising from climate change.

10.109 With regard to financial contributions, GCC Community Infrastructure has requested contributions of £79,542.40 to secondary 16-18 education and £11,760 to library services. 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. GCC advises that the village's primary school has capacity to accommodate children arising from the proposed development.

10.110 Willersey Parish Council has also requested S106 contributions towards improvements to the village hall, the recreation ground and cemetery, as well as a contribution either financially or in the form of land release for allotments. The requested contributions include: Allotment provision Land or lease; village Hall expansion & upgrades £175,000; recreation Ground improvements £30,000; and cemetery paths £10,000. In response to these requests, the applicant is agreeable to a contribution of £120,000 towards village hall improvements and £8,000 towards the village's recreation ground. It is noted

that a £60,000 contribution towards the village hall has been agreed as part of the recently approved development for 30 dwellings on land adjacent to Folly View in the village. It is considered that the £120,000 represents a proportionate level of contribution in this instance. With regard to the recreation ground contribution, it is noted that this development would provide an on-site equipped play area, as well as a reasonably large area of open space which could be used as a kickabout area or dog exercising area. The proposed development would therefore provide a reasonable level of outdoor play and recreation space which would reduce pressure on the existing recreation ground in the village. GCC Community Infrastructure states that the proposed development would generate approximately 16.8 primary school aged children and 8.2 secondary (11-16) aged children. The proposed on-site play area would address many of the needs of younger children, without the need to use the existing recreation ground. The number of older age children would be relatively limited in number and is considered not to place undue strain on the existing village facilities. The provision of £8,000 towards the existing recreation ground is therefore considered reasonable in this instance.

10.111 With regard to cemetery footpath upgrades, it is noted that a contribution to such works has been agreed as part of the Folly View development. There is therefore no additional requirement for a further contribution in order to make this current development acceptable in planning terms.

10.112 With regard to allotments, The parish council states:

10.112.1 *'We request the replacement of these allotments and suggest a reduced area be made available for rent by the PC e.g. 2 acres, provided it was suitably prepared i.e. fenced, car parking, water provision etc. with road access, 1 acre would be for cultivation. The applicant owns the adjacent land and is in a position to accede to this requirement.'*

10.112.2 *'If the site is not fully prepared and available on a long term lease then we would request ownership of the land as it would make little sense for us, or users, to invest in land which could be removed from our control at relatively short notice.'*

10.113 It is noted that southern part of the application site has historically included an area of land which was used for allotments. Aerial photographs dating from 2000 indicate that allotments were present on part of the site adjacent to the B4632. However, photographs dating from 2014 onwards indicate a change in the character of the land and a move to a grassed area and subsequently the more overgrown appearance that is seen today. It does not appear that the land

has been used as allotments in a practical sense for a number of years. It is noted that the applicant gave interested parties who were using the land a 12 month notice period in 2023. As such, the land is no longer used by third parties and is no longer used as allotments. Furthermore, there is no duty for the current landowner to make the land available as allotments or provide alternative facilities. In addition, as the area of land in question is not maintained/managed by a local authority, it is not subject to the same statutory protection that would be applicable should a local authority wish to dispose of an allotments in its control. In such circumstances, the local authority would need to obtain the consent of the Secretary of State. This is not the case for a private landowner.

10.114 An allotment is an area of land, leased either from a private or local authority landlord, for the use of growing fruit and vegetables. In some cases this land will also be used for the growing of flowers, and the keeping of hens, rabbits and bees. The keeping of other types of livestock would not typically constitute an allotment use. The aerial photographs of the site over the last 10 years or more show that the land has been overgrown and has not served a function as allotments. Whilst an individual(s) may have had a tenancy agreement in place until recently, the use has now ceased. Officers therefore question the community value of the space, especially since the tenancy agreements have now ceased and there is no public right of access to the land.

10.115 The site is allocated for residential development in the Local Plan. The site allocation policy makes no requirement for allotments or for allotments to be retained/replaced. The use of the land for residential development has therefore been assessed as being acceptable in principle through the Local Plan process.

10.116 There is no requirement for the current landowner to continue to provide allotments or to find an alternative location. Furthermore, neither Local Plan Policy INF2 nor the Local Plan site allocation require alternative facilities to be provided following the development of the site where that the site is no longer in allotment use. The provision of alternative allotments is not therefore something that would be necessary to make the planning application acceptable in planning terms. It is noted that the parish council has referred to the provision of open space and the support for such areas in the NPPF. Paragraphs 98 of the NPPF seeks to provide open spaces and social and recreation facilities in new development. Paragraph 104 seeks to protect existing open space, and for its loss to be justified or a replacement offered.

10.117 The definition of 'open space' in the NPPF is:

' All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as visual amenity.'

10.118 In the case of this development, the applicant is providing open space, including recreation space, on site, which is considered to be appropriate for the size and form of the proposal. The NPPF does not set out a formal requirement to deliver new allotments as part of new housing schemes. The current proposal is therefore considered not to conflict with the aspirations of the NPPF in this respect.

10.119 Notwithstanding this, the applicant has confirmed that they are willing to enter into discussions with the parish council about the potential release of other land in their ownership as an allotments. This would be a separate matter for the applicant and the parish council.

10.120 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 The proposed scheme seeks to introduce new residential development onto a site located within Willersey Development Boundary and which is allocated for residential development in the Local Plan. In addition, the Council cannot currently demonstrate a robust 5 year supply of housing land. Paragraph 11 d of the NPPF is therefore applicable to this application. In the case of paragraph 11 d i, it is considered that the proposed development would not cause harm to the setting of the Cotswolds National Landscape. As such, the impact of the proposal on the aforementioned protected area does not provide a strong ground to refuse the application in this instance. In the case of paragraph 11 dii, it is considered that the benefits arising from the delivery of new housing, including affordable housing, weigh heavily in favour of the proposed scheme. Subject to no objection being raised by the Biodiversity Officer, it is considered that the adverse impacts of the proposal do not significantly and demonstrably outweigh the benefits. It is therefore recommended that this application is granted permission subject to the recommendation set out above.

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):

24.050.100 9, 24.050.101 9, 24.050.102 9, 24.050.103 9, 24.050.104 9, 24.050.105 9, 24.050.106 6, 24.050.107
24.050.1000 2,

24.050.200 A, 24.050.201.01, 24.050.201.02, 25.050.201.03 A, 24.050.202, 24050.203, 24050.204 A, 24.050.206 A, 24050.207 A, 24050.208.01 A, 24050.208.02 A , 24050.208.03 A, 24050.209 A, 24050.210 A, 24050.211.01 A, 24050.211.02 A,

24050.GAR.01 A, 24050.GAR.02 A, 24050.GAR.03 A, 24050.GAR.04 A.

PRI24834 11A Sheet 1 of 4, PRI24834 11A Sheet 2 of 4, PRI24834 11A Sheet 3 of 4, PRI24834 11A Sheet 4 of 4.

PRI24834 12A Sheet 1 of 4, PRI24834 12A Sheet 2 of 4, PRI24834 12A Sheet 3 of 4, PRI24834 12A Sheet 4 of 4.

PRI24834 20

24.050.SSO1 1,

241030-RAP-XX-XX-DR-D-3100 P04.

241030-RAP-XX-XX-DR-TP-6000 P03 and 241030-RAP-XX-XX-DR-TP-6001 P02, or 241030-TP-6002 P01 and 241030-TP-6003 P01.

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 and roofing materials shall be 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, sample panels 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 panels. The panels 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.

5. Prior to the construction of any external wall of the development hereby approved, a sample panel of render of at least one metre square in size showing its proposed texture and colour 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 and shall be permanently retained as such thereafter. 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 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. New render shall be of a roughcast type and be of a mix containing sharp sand, stone dust, pea shingle and lime unless an alternative mix is agreed in writing by the Local Planning Authority. The render shall finish flush with all stone dressings and shall not be belled outwards over the heads of doors, windows or any other opening.

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.

7. 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.

8. No bargeboards, exposed rafter feet or eaves fascias 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.

9. Within one month of their installation, windows and external doors shall be painted/finished in a colour that has first been approved in writing by the Local Planning Authority.

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 windows, external doors or rooflights shall be installed/inserted/constructed in the development hereby approved, until their design and details 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. 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. The development hereby permitted shall be managed and maintained in accordance with the details in the document titled ' Soft Landscape Management and Maintenance' Reference PRI24834man Date July 2025 Revision A.

Reason: In order to ensure that new and existing landscaping will be maintained and managed in a manner that will contribute in a positive way to the character and appearance of the site and the surrounding area in accordance with Local Plan Policies EN2, EN4 and EN5.

12. 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 first occupation of the development hereby permitted.

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.

13. 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.

14. Prior to the first occupation of 10 of the dwellings hereby permitted, the Local Equipped Area of Play shall be provided fully in accordance with the details shown on drawing PRI24834 20 and it shall be retained in accordance with the approved details thereafter.

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.

15. 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 9 of the National Planning Policy Framework.

16. Prior to the first use of the new vehicular access onto the B4632, it shall be provided with visibility splays in accordance with the details show on drawing 241030-RAP-XX-XX-DR-TP-3200 P03 (Transport Statement May 2025), with all obstructions to visibility greater than 0.9m above the level of the carriageway removed, and the visibility splays shall be retained as such thereafter.

Reason: In the interests of highway safety in accordance with Local Plan Policy INF4 and Section 9 of the National Planning Policy Framework.

17. 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.

18. Prior to the first occupation of the development hereby permitted, pedestrian and vehicular accesses from the application site to the B4632 shall be provided fully in accordance with the approved details.

Reason: In the interests of highway safety in accordance with Local Plan Policy INF4.

19. Prior to the first occupation of the development hereby permitted, off-site highway works shall be completed fully in accordance with drawings 241030-RAP-XX-XX-DR-TP-6000 P03 and 241030-RAP-XX-XX-DR-TP-6001 P02, or, drawings 241030-RAP-XX-XX-DR-TP-6002 P01 and 241030-RAP-XX-XX-DR-TP-6003 P01.

Reason: In the interests of highway safety in accordance with Local Plan Policy INF4.

20. Prior to the first occupation of each dwelling hereby permitted, each respective dwelling shall be provided with car parking and access to a highway maintainable at public expense in accordance with the approved details.

Reason: In order to ensure that adequate parking and access is provided for future occupiers of the development hereby permitted in accordance with Local Plan Policies INF4 and INF5 and guidance in Section 9 of the National Planning Policy Framework.

21. 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 in writing by the Local Planning Authority to allow the 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.

22. 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.

23. Prior to the installation of any external lighting, a scheme shall be submitted to and agreed in writing by the Local Planning Authority which specifies the provisions to be made for the level of illumination of the site and the control of light pollution. The scheme shall be implemented and retained in accordance with the approved details. No other external lighting shall be installed on the site other than that agreed as part of the approved lighting scheme.

Reason: In order to preserve the rural character and appearance of the site and in the interests of residential amenity and biodiversity, in accordance with Cotswold District Local Plan Policies EN2, EN4, EN5, EN8, and EN15.

24. Prior to the first occupation of Plots 4, 5, 18, 19, 20, 47 and 48, the first floor habitable rooms of the respective plots, which face towards the site of the employment development approved under planning permission 22/03534/FUL, shall be provided with mechanical ventilation fully in accordance with details that have first been approved in writing by the Local Planning Authority and the development shall be retained in accordance with the approved details thereafter.

Reason: In order to ensure that future occupants are provided with an adequate level of residential amenity in accordance with Local Plan Policy EN15 and Paragraph 198 of the National Planning Policy Framework.

25. 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 Strategy shall be in accordance with the proposal set out in the approved submission (Proposed Drainage Layout; 241030-RAP-XX-XX-DR-D-3100-P04). The SuDS Strategy must include a detailed design and 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.

26. No dwelling shall be occupied until a SuDS Management and Maintenance Plan for the lifetime of the development, which shall include the arrangements for adoption by a 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 Management and Maintenance Plan shall be implemented in full, and thereafter managed and maintained fully in accordance with the approved timescales and details.

Reason: To ensure the continued operation and maintenance of drainage features serving the site and avoid flooding in accordance with Local Plan Policy EN14.

27. No development shall commence on site until a Construction Phase Surface Water Management Plan has been submitted to and approved in writing by the Local Planning Authority. The plan shall outline what measures will be used throughout the period of the construction of the development to ensure surface water does not leave the site in an uncontrolled manner and put properties elsewhere at increased risk of flooding.

The construction phase of the development hereby permitted shall be undertaken fully in accordance with the approved plans.

Reason: To ensure the construction phase of the development has a satisfactory means of drainage that does not increase the risk of flooding from the site in accordance with Local Plan Policy EN14. It is important that these details are agreed prior to the commencement of development as any on-site works could have implications for flooding and drainage.

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. Works on the Public Highway

The development hereby approved includes the carrying out of work on the adopted highway. You are advised that before undertaking work on the adopted highway you must enter into a highway agreement under Section 278 of the Highways Act 1980 with the County Council, which would specify the works and the terms and conditions under which they are to be carried out.

Contact the Highway Authority's Legal Agreements Development Management Team at highwaylegalagreements@gloucestershire.gov.uk allowing sufficient time for the preparation and signing of the Agreement. You will be required to pay fees to cover the Councils costs in undertaking the following actions:

- Drafting the Agreement
- A Monitoring Fee
- Approving the highway details
- Inspecting the highway works

Planning permission is not permission to work in the highway. A Highway Agreement under Section 278 of the Highways Act 1980 must be completed, the bond secured and the Highway Authority's technical approval and inspection fees paid before any drawings will be considered and approved.

Traffic Regulation Order (TRO)

You are advised that a Traffic Regulation Order (TRO) is required. You must submit a plan to scale of an indicative scheme for a TRO, along with timescales for commencement and completion of the development. Please be aware that the statutory TRO process is not straightforward; involving advertisement and consultation of the proposal(s).

You should expect a minimum of six months to elapse between the Highway Authority's TRO Team confirming that it has all the information necessary to enable it to proceed and the TRO being advertised. You will not be permitted to implement the TRO measures until the TRO has been sealed, and we cannot always guarantee the outcome of the process.

We cannot begin the TRO process until the appropriate fee has been received. To arrange for a TRO to be processed contact the Highway Authority's Legal Agreements Development Management Team at

Highway to be Adopted

The development hereby approved includes the construction of new highway. To be considered for adoption and ongoing maintenance at the public expense it must be constructed to the Highway Authority's standards and terms for the phasing of the development. You are advised that you must enter into a highway agreement under Section 38 of the Highways Act 1980. The development will be bound by Sections 219 to 225 (the Advance Payments Code) of the Highways Act 1980.

Contact the Highway Authority's Legal Agreements Development Management Team at highwaylegalagreements@gloucestershire.gov.uk. You will be required to pay fees to cover the Council's costs in undertaking the following actions:

- Drafting the Agreement

- Set up costs
- Approving the highway details
- Inspecting the highway works

You should enter into discussions with statutory undertakers as soon as possible to co-ordinate the laying of services under any new highways to be adopted by the Highway Authority.

The Highway Authority's technical approval inspection fees must be paid before any drawings will be considered and approved. Once technical approval has been granted a Highway Agreement under Section 38 of the Highways Act 1980 must be completed and the bond secured.

No Drainage to Discharge to Highway

Drainage arrangements shall be provided to ensure that surface water from the driveway and/or vehicular turning area does not discharge onto the public highway. No drainage or effluent from the proposed development shall be allowed to discharge into any highway drain or over any part of the public highway.

Protection of Visibility Splays

The applicant's attention is drawn to the need to ensure that the provision of the visibility splay(s) required by this consent is safeguarded in any sale of the application site or part(s) thereof.

Travel Plan

The proposed development will require a Travel Plan as part of the transport mitigation package (together with a Monitoring Fee and Default Payment) and the Applicant/Developer is required to enter into a legally binding Planning Obligation Agreement with the County Council to secure the Travel Plan.

Gloucestershire County Council has published guidance on how it expects travel plans to be prepared, this guidance is freely available from the County Council's website. As part of this process the applicant must register for Modeshift STARS and ensure that their targets have been uploaded so that progress on the implementation of the Travel Plan can be monitored.

Modeshift STARS Business is a nationally accredited scheme which assists in the effective delivery of travel plans, applicant can register at www.modeshiftstars.org

Construction Management Plan (Advisory)

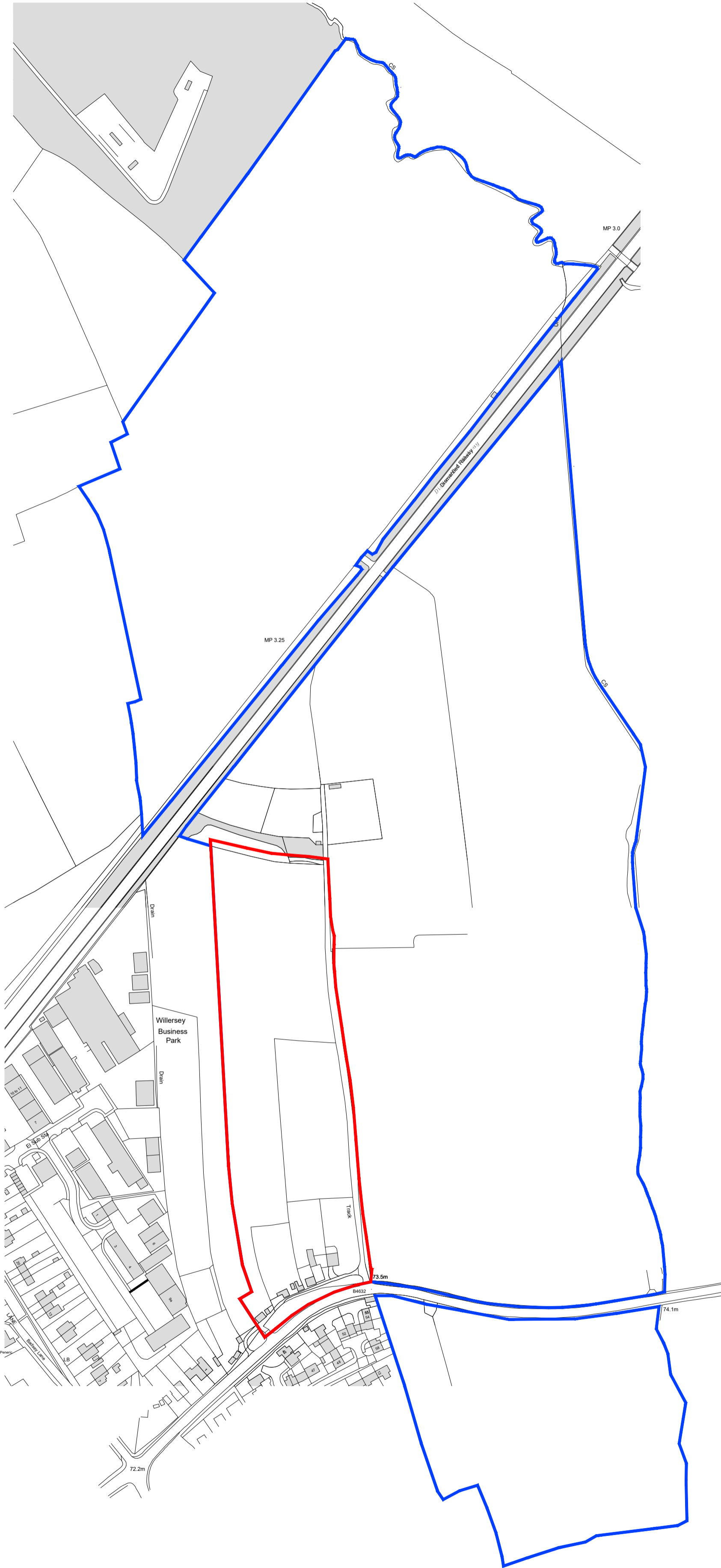
It is expected that contractors are registered with the Considerate Constructors scheme and comply with the code of conduct in full, but particularly reference is made to "respecting the community" this says:

- Constructors should give utmost consideration to their impact on neighbours and the public;
- Informing, respecting and showing courtesy to those affected by the work;
- Minimising the impact of deliveries, parking and work on the public highway;
- Contributing to and supporting the local community and economy; and
- Working to create a positive and enduring impression and promoting the Code.

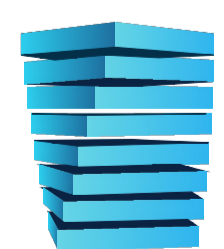
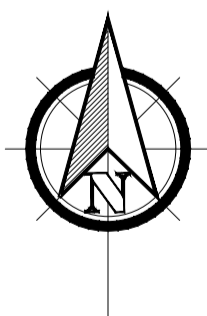
NOTES:
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REVISIONS

NO.	DESCRIPTION	DATE



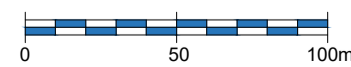
- Application Boundary
- Land within applicants ownership



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 Stonehouse, Gloucestershire, GL10 3NG
 T: +44 (0)1285 641234 E: mail@ericcole.co.uk W: www.ericcole.co.uk

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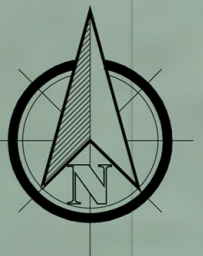


PROJECT:	LAND NORTH OF B4632, WILLERSEY		
DWG TITLE:	SITE LOCATION PLAN		
SCALE:	1:2500 @ A2	DRAWN: RP	CHECKED: RJW
DWG NO:	24.050.1000	REV: 2	DATE: MAY 25

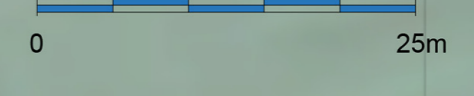
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REVISIONS



- RT AFFORDABLE RENT
- SR SOCIAL RENT
- SO AFFORDABLE SALE
- SB SELF BUILD UNIT



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PROJECT:	LAND TO THE NORTH OF THE B4632, WILLERSEY		
DWG TITLE:	SITE LAYOUT		
SCALE:	1:500@A1	DRAWN: RP	CHECKED: RJW
DWG NO:	24.050.100	REV: 9	DATE: MAR 25

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REVISIONS



STREET SCENE A-A



STREET SCENE B-B



STREET SCENE C-C



STREET SCENE D-D

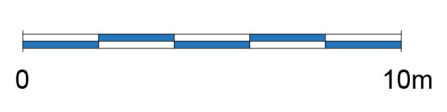


SITE LAYOUT 1:1250



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PROJECT:	LAND TO THE NORTH OF THE B4632, WILLERSEY		
DWG TITLE:	STREET SCENES		
SCALE:	1:200@A1	DRAWN: FW	CHECKED: RP
DWG NO:	24.050.SS01	REV: 1	DATE: APRIL 25

Page 91

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Fitness equipment



7. Beverley robinia parallel bars. Product code:TBR7232

8. Atkinson robinia climbing apparatus. Product code:TBR7201

Benches - Bryntirion Seat. Product code: BX14 1035



Bin - Weyburn open top litter bin. Product code: BX14 203/LB



Notes:
All equipment, surfacing and structures to be installed in line with BS EN1176 and BS EN1177 and to receive a post installation RoSPA inspection prior to opening of facility.

Entrance to have signage outlining no dogs allowed, the use of the facility, management responsibility and emergency contact details.

Play equipment to be installed in line with suppliers recommendations. As supplied by (or similar):
Miracle Play, The Old Brewery, Towcester Rd, Milton Malsor, Northampton, NN73AP.
Bin & Benches - Broxap Ltd., Rowhurst Industrial Estate, Chesterton, Newcastle-under-Lyme ST5 6BD.
Gates - Jacksons Fencing, Stowting Common, Ashford, Kent, TN25 6BN.
Safety surfacing to be rubber mulch as supplied by DCM surfaces or similar. DCM Surfaces, Wigan Road, Leyland, PR25 5XW.



1. Kangaskhan robinia slide. 1.8m high. Providing sliding and climbing play experiences. Product code:TBR7189



2. Hitmonchan robinia multi play unit, providing climbing, balancing, sliding, imaginative and social play experiences. Product code:TBR7201



3. Caterpie robinia stepping posts, providing balancing and imaginative play experiences. Product code:TBR7146



4. Pidgey robinia swing, providing swinging play experience. Product code:TBR7134



5. Moltres robinia inclusive swing, providing swinging play experience. Product code:TBR7162



6. Electrobe robinia roundabout, providing rotating and social play experiences. Product code: TBR7174



Land to the north of the B4632, Willersey LEAP Proposals

Rev	Date	Details	Drawn

ACD ENVIRONMENTAL
HEAD OFFICE
Rodbourne Rail Business Centre, Grange Lane, Malmesbury, SN16 0ES
Tel: 01666 825646

Unit 7, Godalming Business Centre, Woolsack Way, Godalming, GU7 1XW
Tel: 01483 425714

Crescent House, Yonge Close, Eastleigh, SO50 9SX
Tel: 02382 026300










email: mail@acdenv.co.uk
www.acdenvironmental.co.uk

scheme: Land to the north of the B4632, Willersey
client: Gloucester Diocese
drawing: LEAP Proposals
date: May 2025
scale: 1:200@A3
drawing no: PRI24834 20
drawn: ALK checked: JS

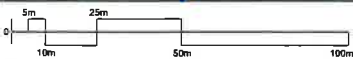
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LEGEND

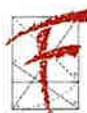
-  existing building / structure outside the application site area
-  existing building / structure within the application site area
-  new industrial building / structure
-  Development Site under Application
-  Land within Auto-Sleepers Ownership
-  operatives pedestrian pathway
-  additional on site staff / visitor / service parking bay = 44
EV = 8
Blue Badge = 4
-  new vehicle entrance two way for small vehicles exit only for HGV
-  existing vehicle entrance entrance to HGV only

INDUSTRIAL
ESTATE
EXTENSION
22/03534/ENL



Notes
Check dimensions before use and notify the Architect of any discrepancies immediately.
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Revisions
A: 30.09.22 - First Issue
B: 03.10.22 - Second Issue
C: 05.10.22 - Planning Issue



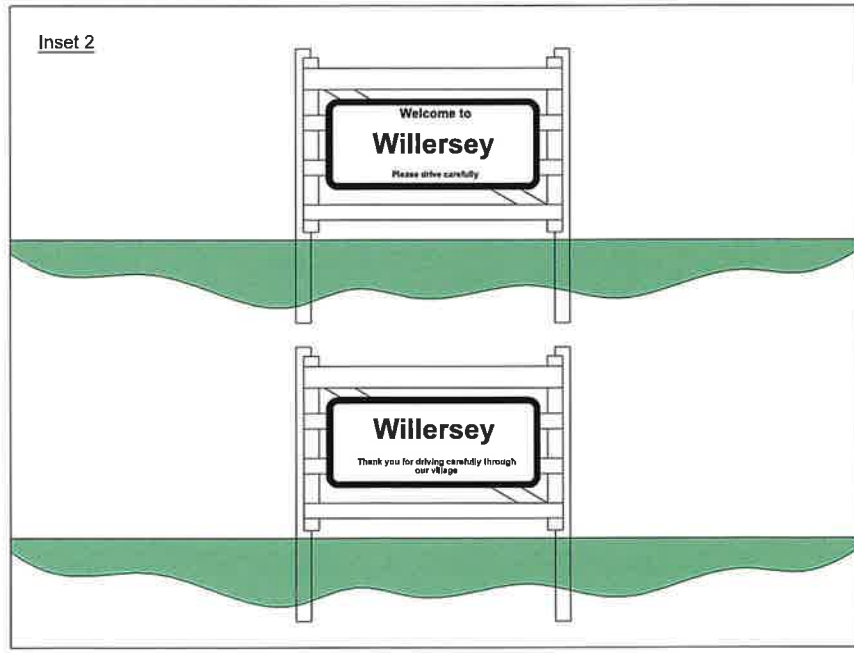
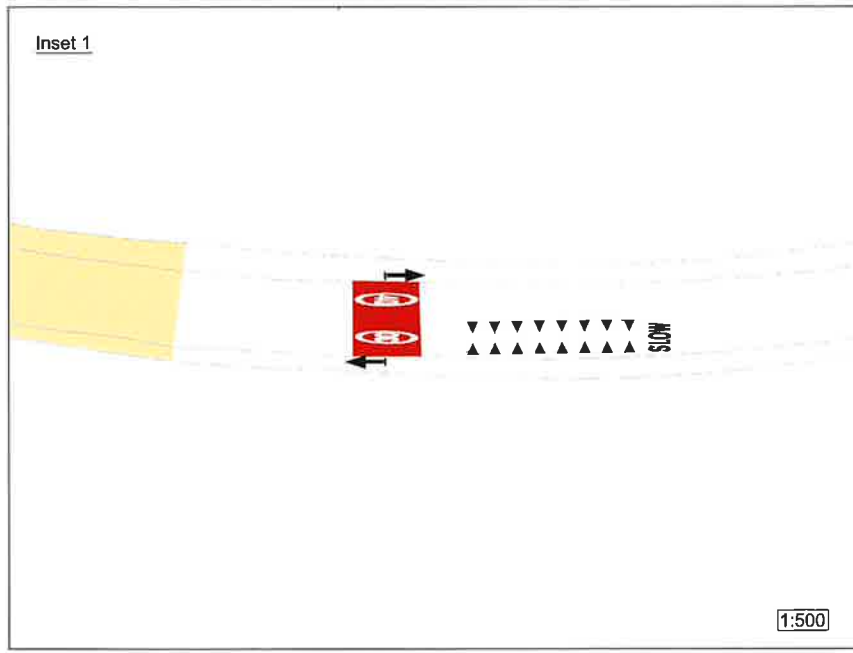
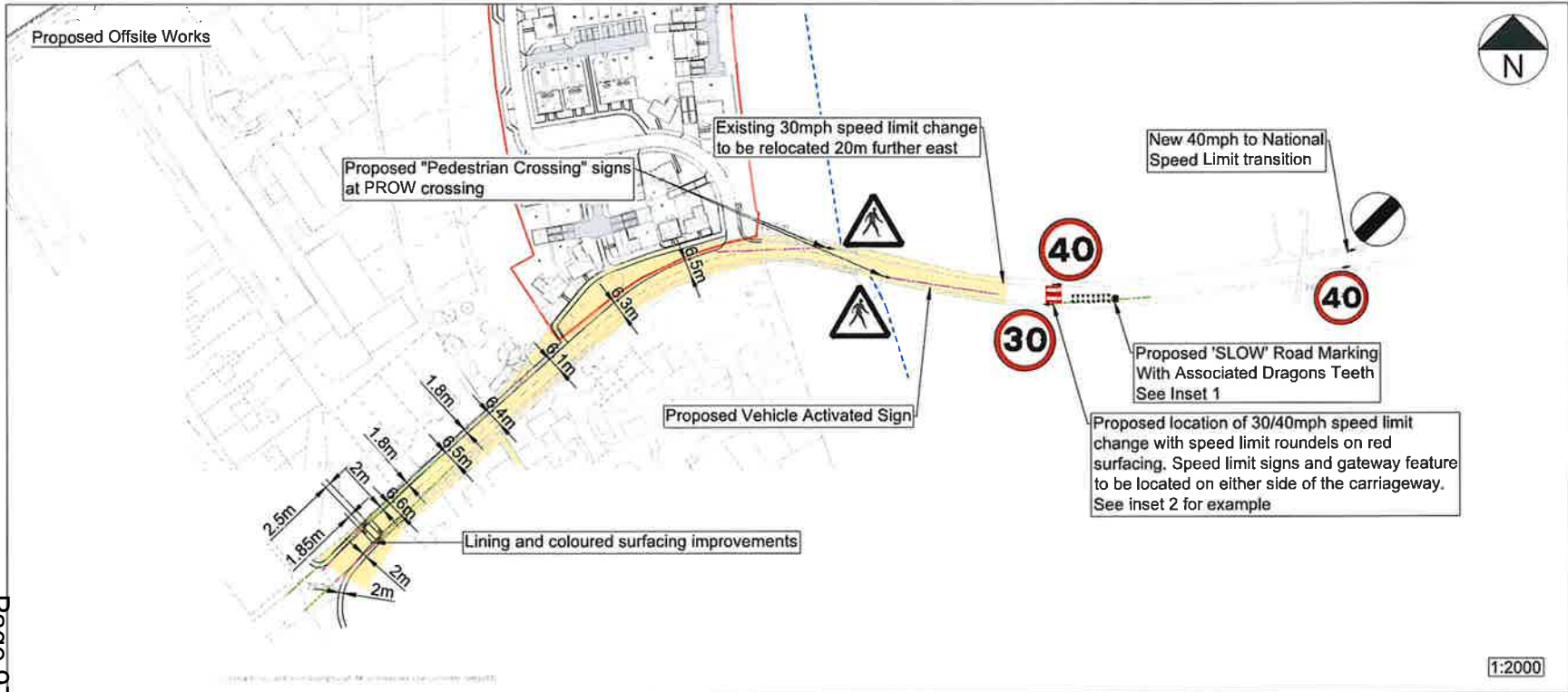
Job Title
AUTO-SLEEPERS,
Willersey, Colswold,
Commercial Expansion

Graham Frecknall Architecture & Design
11 Agincourt Street, Mansfield, Nottinghamshire, N7 2S 3JZ
Tel: 01820 716418 Fax: 01600 714307 E-mail: gfa@frecknall.co.uk

Drawing Title
Proposed Site Block Plan

Drawn	HD	Date	Scale
		APR 2022	1:750 @ A1
Job Number	Work Stage	Page	Rev.
1010.10	PLANNING		C
Drawing Number	AL.P.110		

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- Notes:**
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 - The layout is subject to detailed design, capacity testing, ground investigations & earth modelling, road safety audit, utilities & services and confirmation of land ownership.
 - Use of the drawing does not absolve the client from their responsibilities in regards to health & safety and CDM regulations.
- Key:**
- Indicative Site Boundary
 - Adopted Highway Boundary
 - 40m Visibility Splay to speed limit change
 - 45m Visibility Splay to pedestrian crossing sign
 - PROW - Public Right of Way

Rev	Date	Details	By	Chkd
P01	22.01.26	First Issue	GA	DC



CLIENT:
Gloucester Diocesan Board of Finance

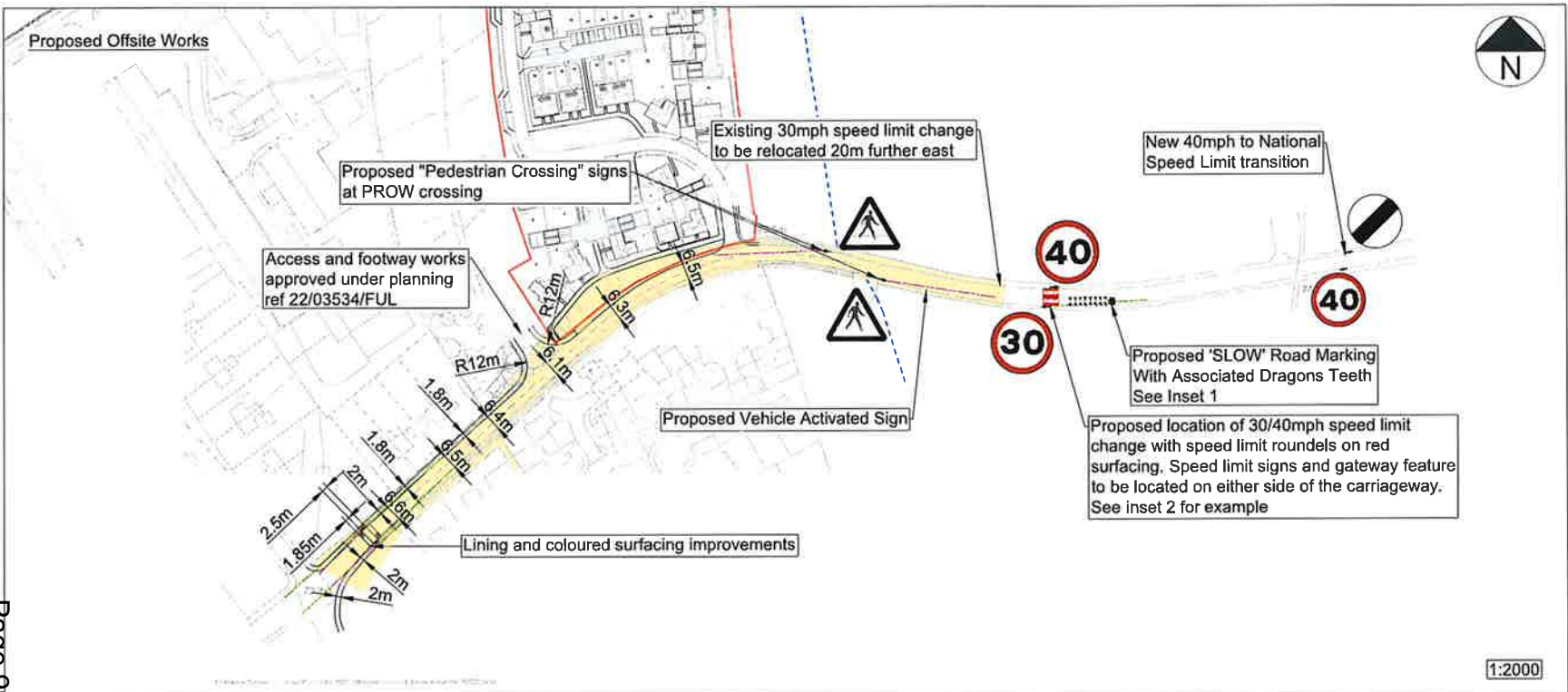
PROJECT:
Land at Willersey

TITLE:
Proposed Offsite Works
Without Autospleers

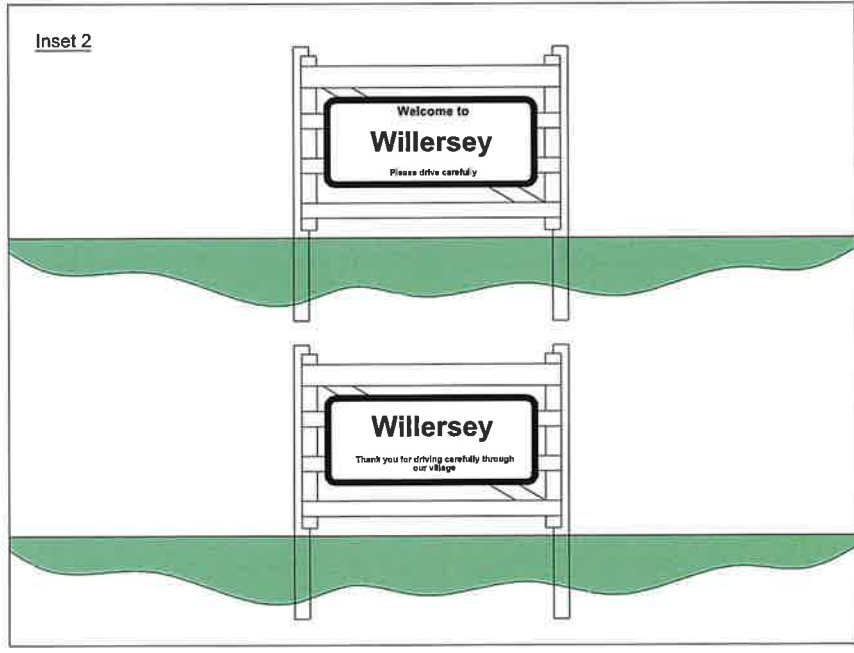
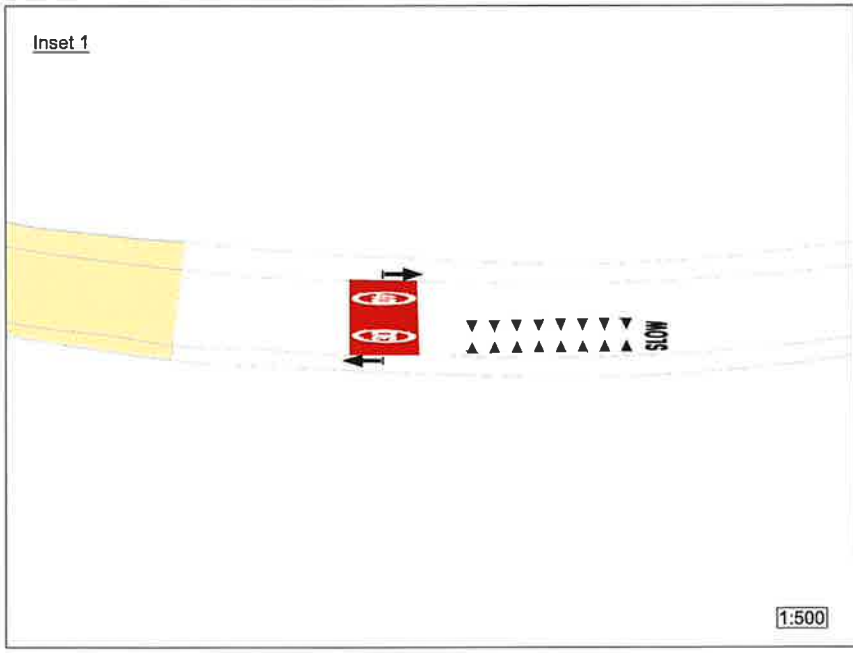
SCALE @ A3:	DATE:	DRAWN:	CHECKED:	APPROVED:
As Stated	22.01.26	GA	DC	MG

STATUS:	INFORMATION	REVISION
DRAWING NO	241030-RAP-XX-XX-DR-TP-6002	P01

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 - 45m Visibility Splay to pedestrian crossing
 - PROW - Public Right of Way



Rev	Date	Details	By	Chkd
P03	14.05.25	Updated Site Layout & Access	SB	MG
P02	15.04.25	Updated Site Layout & Footway Connection	JL	JNDS
P01	05.03.25	Updated Footway Connection	SB	JNDS



CLIENT: Gloucester Diocesan Board of Finance

PROJECT: Land at Willersey

TITLE: Proposed Offsite Works

WITH AUTOSLEEPERS

SCALE @ AS	DATE	DRAWN	CHECKED	APPROVED
As Stated	26.02.25	SB	JNDS	MG

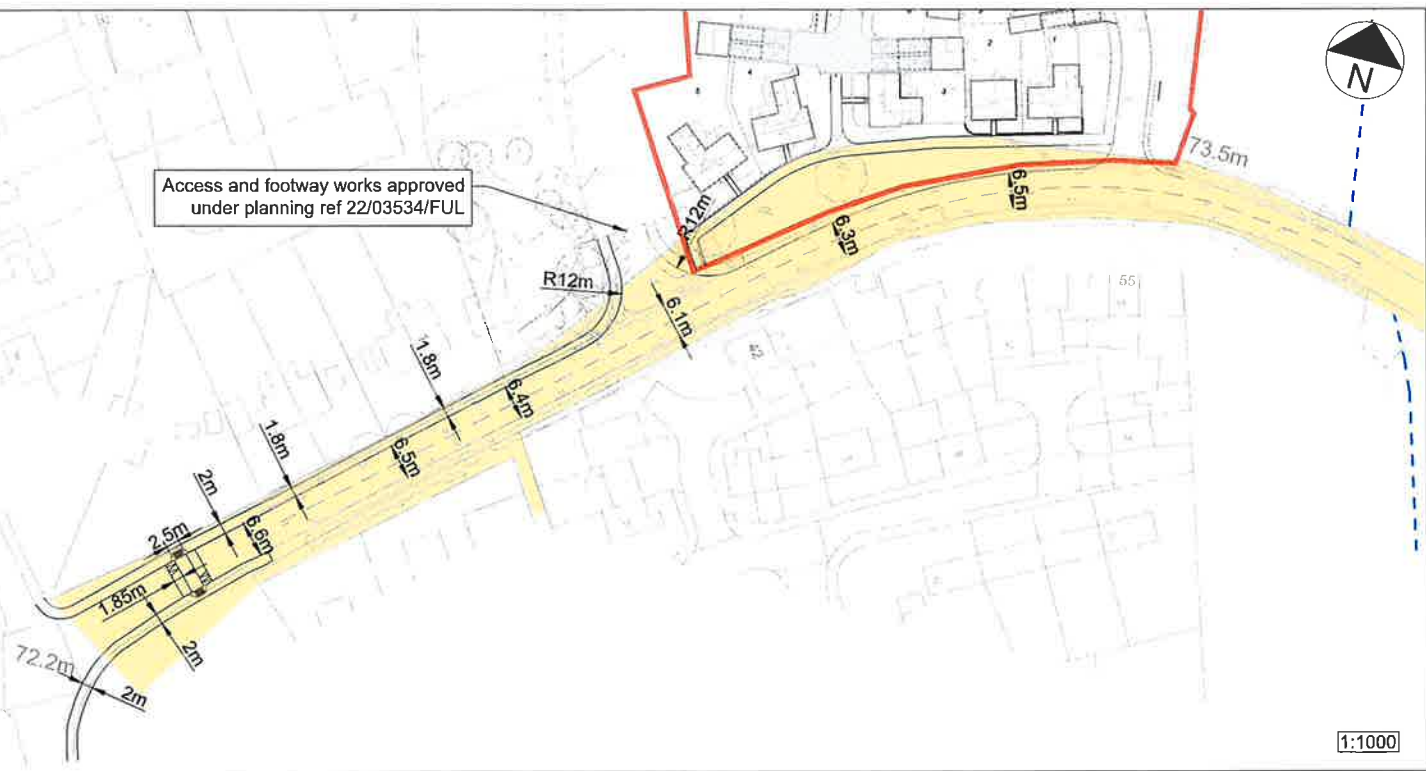
STATUS: INFORMATION

DRAWING NO:	REVISION:
241030-RAP-XX-XX-DR-TP-6000	P03

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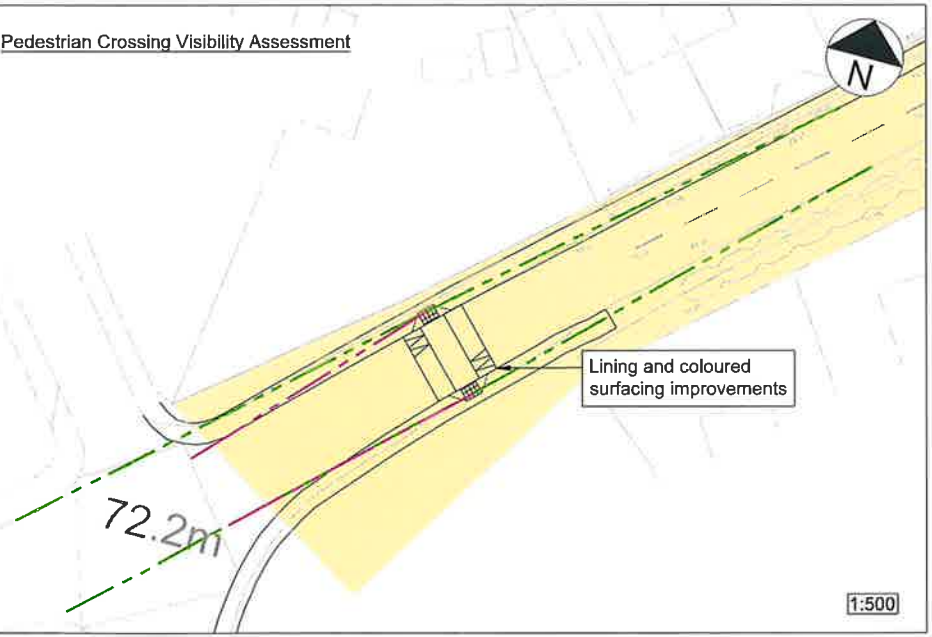
Proposed Footway

Access and footway works approved under planning ref 22/03534/FUL



1:1000

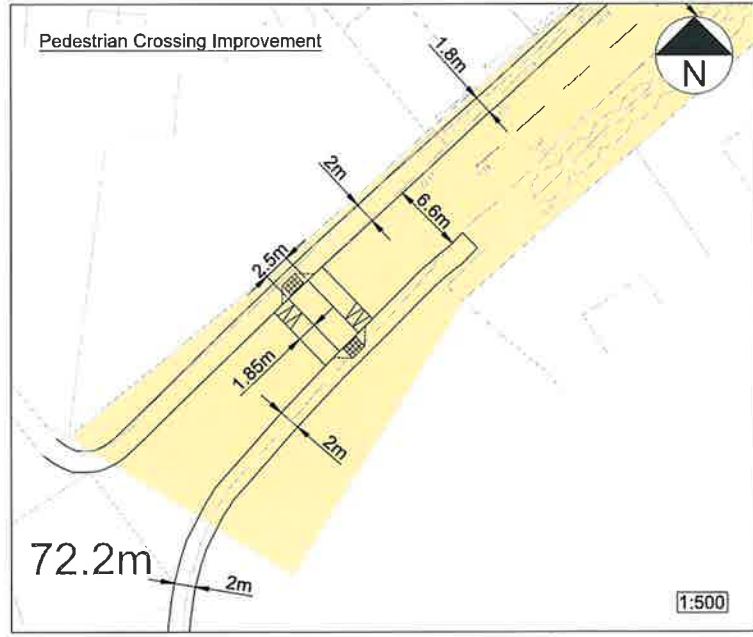
Pedestrian Crossing Visibility Assessment



Lining and coloured surfacing improvements

1:500

Pedestrian Crossing Improvement



1:500

Notes:

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Key:

- Indicative Site Boundary
- Adopted Highway Boundary
- — — PROW - Public Right of Way
- - - - - 1.0m x 43m Pedestrian Visibility Splay
- - - - - 1.0m x 26m Pedestrian Visibility Splay to Junction

P02	14.05.25	Updated Site Layout & Access	SB	MG
P01	15.04.25	Updated Site Layout & Proposed Footway	JL	JNDS
Rev	Date	Details	By	Chkd



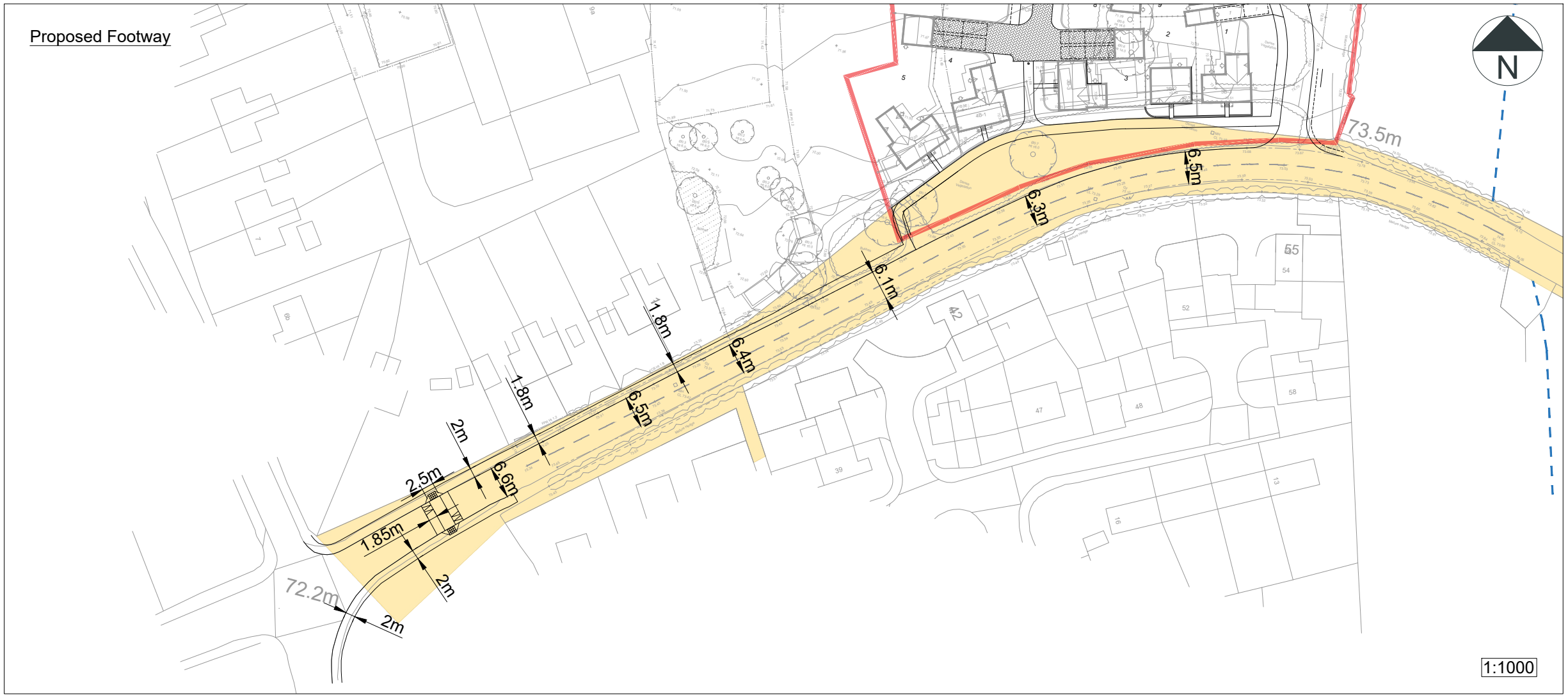
CLIENT: Gloucester Diocesan Board of Finance
 PROJECT: Land at Willersey

TITLE: Proposed Footway Connection
with AUTO SLEEPS

SCALE @ A3	DATE	DRAWN	CHECKED	APPROVED
As Stated	05.03.24	SB	JNDS	MG
STATUS: INFORMATION				REVISION
DRAWING NO: 241030-RAP-XX-XX-DR-TP-6001				P02

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Proposed Footway



Notes:

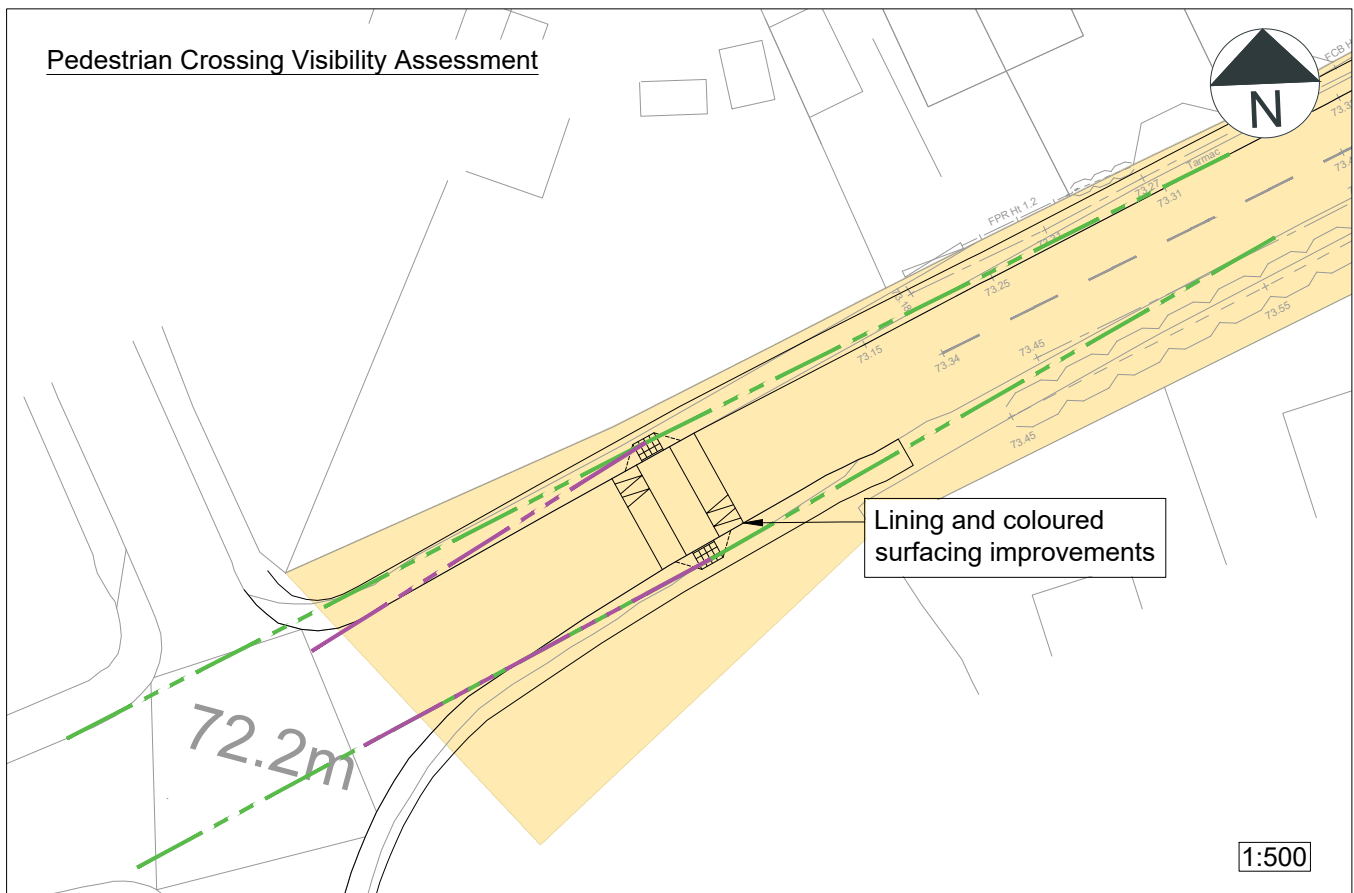
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- 1.0m x 26m Pedestrian Visibility Splay to Junction

Page 103

Pedestrian Crossing Visibility Assessment



Pedestrian Crossing Improvement



Rev	Date	Details	By	Chkd
P01	22.01.26	First Issue	GA	DC



CLIENT: Gloucester Diocesan Board of Finance
PROJECT: Land at Willersey
TITLE: Proposed Footway Connection Without Autospleers

SCALE @ A3:	DATE:	DRAWN:	CHECKED:	APPROVED:
As Stated	22.01.26	GA	DC	MG
STATUS: INFORMATION				
DRAWING NO: 241030-RAP-XX-XX-DR-TP-6003				REVISION: P01

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The Parish Council have asked that this be registered as their comment:

Application Reference: 25/02687/FUL **Location:** Land to the East of Willersey Business Park, Willersey **Proposal:** Erection of 60 Dwellings

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. 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. 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 piece meal decisions.

Willersey Parish Council is aware of the above application and, having engaged with the developer and considered the proposals in light of community concerns, hereby wishes to register its **formal and robust objection** unless fundamental infrastructure and safety concerns are fully mitigated.

While the Parish Council acknowledges this site is identified within the Local Plan (W7A/WIL-EC1) and welcomes the amendments made—including the proposed housing split and the allocation of bungalows, social, and affordable housing—we assert that the application fails to meet key tests within the National Planning Policy Framework (NPPF 2024) and the Cotswold District Local Plan (CDLP).

1. Flooding, Foul Sewage, and Surface Water (NPPF 170; CDLP EN14)

The Parish Council deems the lack of capacity within the existing sewage and water systems to be of **primary importance** to the health and wellbeing of our residents.

- **Foul Sewage Capacity:** Frequent flooding of both rainwater and untreated sewage is experienced in all parts of the village. Foul sewage has, on many occasions, reached the watercourses of Badsey Brook and its culverts.
- **Inadequate Pumping Station:** The **Badsey Lane pumping station is completely inadequate** for the existing housing stock, let alone a further 60 properties. Severn Trent has already instigated a **Grampian Condition**, confirming their present inability to upgrade the system necessary to service this development.
- **Water Supply Network Capacity:** The Planning Statement is silent on this critical issue. The **Thames Water Comments** on a comparable local application (25/02983/OUT) officially confirmed the *"inability of the existing water network infrastructure to accommodate the needs of this development proposal,"* requiring network upgrades **before** occupation. This confirms that the necessary infrastructure is **not currently available**, placing an unacceptable risk of no/low water pressure on existing residents and directly contravening planning policy.
- **Non-Compliance:** The lack of essential infrastructure is **detrimental to the health and wellbeing** of residents, and unless fully remedied, the application fails to meet the needs of **NPPF 170** and **CDLP EN14**. Evidence of flooding has been previously submitted.

2. Highway Safety and Burdensome Traffic (NPPF 96; NPPF 109)

The issue of Highway Safety, raised by both the Parish Council and residents, represents the second critical barrier to this development.

- **Hazardous Access Location:** The proposed access route is situated on the B4632 at a **blind bend** with no current footway. The B4632 is known for considerable speeding, with traffic often exceeding the 30 mph limit approaching the village.
- **Poor Visibility:** There is a poor line of sight in both directions. Approaching the village from the Stratford direction, vehicles travelling at speed will have **little or no visibility** of a vehicle attempting a right turn into the development. Conversely, traffic exiting the village frequently accelerates towards the 40 mph zone, creating risk for vehicles turning left. The application does not **fully address** this safety deficit.
- **Conflict with HGV Movements:** This stretch of road is also designated for the egress of large HGVs from the adjacent Autosleepers site (under granted planning application 22/0654/FUL). The proximity of the proposed access road to the Autosleepers egress will lead to a **direct conflict** between HGV traffic and the development's residents.
- **Traffic Burden:** With 60 properties, there will likely be at least 120 additional vehicle movements per day along a section of the B4632 that is already **overburdened** with HGVs avoiding the congested A44 and A46, using Willersey as a **rat run**.
- **Unsustainable Transport:** All essential facilities (shops, health, secondary schools) are at least two miles distant, necessitating car use. Public transport is infrequent and the nearest stop is over 500 metres away, requiring residents to cross the **Badsey Lane/Pike Corner roundabout**, a known accident blackspot. This contradicts sustainable transport policies and fails to comply with **NPPF 109**.

3. Design, Community Facilities, and Noise (NPPF 104; NPPF 134; CDLP H1, INF7)

While the design is generally compliant with CDC guidance, significant concerns remain regarding the deployment of amenity space and the impact of adjoining land uses.

- **Misuse of Amenity Space:** The proposed playground is considered redundant, given the village already maintains a comprehensive play area within 500 metres. Furthermore, its placement adjacent to a SUDS pond poses an **inherent danger** to small children.
- **Loss of Allotments:** The proposed development has resulted in the loss of much-used allotments for village residents. The Parish Council suggests the amenity space could be better utilised to replace these lost allotments. This loss of facility is a further erosion of community amenity which should be addressed.
- **Noise Impact:** Concerns regarding **Noise generation** from the expanding Willersey Business Park (Autosleepers) remain **unmet**. The Noise Impact Assessment provided is insufficient as it was undertaken *prior* to any expansion work. The proposed 'bund' and non-overlooking windows are not felt to be sufficient protection from the noise, which, under certain climatic conditions, is already audible across the village. The imminent expansion means the noise impact will rise, which is likely to be **detrimental to the health and wellbeing** of residents.

4. Wider Infrastructure and Sustainability (NPPF 96, 98, 100 101; CDLP INF1)

- **Reliance on Neighbouring Authority:** The lack of employment opportunities and essential services within the village necessitates that many residents must travel into the **neighbouring local authority area of Wychavon** in order to shop, work, and access medical services (such as those in Broadway and Evesham). This reliance on cross-border travel, almost exclusively by private car, highlights the unsustainability of the location.
- **School Capacity:** The local primary school is **approaching capacity in most year groups**. Consequently, the influx of families from 60 new dwellings will likely exceed remaining capacity, necessitating that children be transported by vehicle to the nearest available location (potentially out-of-county). This adds strain to educational transport budgets and increases vehicle movements on an already stressed network. The nearest secondary school, Chipping Campden, is also heavily oversubscribed.
- **Health Access:** All necessary health facilities are at least 3 miles distant. Accessing the nearest doctors in Broadway requires crossing the A44 (a 60 mph road), which is not safely accessible on foot.
- **Cumulative Effect:** This development, coupled with applications at Folly View (25/02983/OUT) and the expected proposal at Willow Green, will **almost double the size of the village**. Given CDC's position that Willersey is **not a principal settlement**, the Parish Council asserts that this is **not a sustainable location** for large-scale greenfield housing.

5. Landscape, Heritage, and Biodiversity (NPPF 187, 189 & 190)

- **AONB and Landscape Impact:** The Planning Statement correctly notes that the site is *outside* the AONB but, given that the AONB is immediately to the south, it does lie **within its setting**. The development should be assessed with **great weight** given to conserving scenic beauty (NPPF Paragraphs 189 & 190). While the proposal includes a landscaped edge, the scale and design must be rigorously scrutinised to prevent the **gradual, irreversible erosion of the AONB border** and avoid coalescence with Broadway, which threatens to turn Willersey into an "**urbanised satellite**."
- **Heritage and Archaeology:** While the site is distant from Listed buildings and the Willersey Conservation Area, and the applicant states that archaeological investigations found "nothing considered to be of archaeological significance," the application **lacks a full Heritage Statement** to address the site's setting adjacent to the historic settlement. Furthermore, the Parish Council disputes the dismissal of archaeological potential; the 2017 assessment recommended on-site work which does not appear to have been satisfactorily completed. Given recent finds in the locality (including swords and potential Roman remains), this oversight must be rectified.
- **Biodiversity Net Gain:** The proposed net gain appears **overstated**. The land is currently greenfield used for rural domestic activities (including the lost allotments). To replace this with limited planting, while tarmacking large areas, is not considered a genuine environmental or wellbeing gain for the village.

- **Dark Skies:** The majority of the village has no street lights. We are concerned that lighting associated with this development will add to existing light pollution, conflicting with the AONB's promotion of the **Dark Sky ethos**(NPPF 15). Any lighting must be strictly low-key to retain the village's rural character.

In summary, while the Parish Council wishes to support the provision of housing, the substantial, unmitigated concerns regarding **sewage and flooding capacity, highway safety, and the lack of essential social infrastructure** constitute clear contraventions of the NPPF and outweigh the principle of development at this time.



S106 Funds Request Form - Town/Parish Councils

Please read the Guidance Notes on page 4 before completing this form

General details

Organisation: Willersey Parish Council

Address: Village Hall, Main Street, Willersey WR12 7PJ

Contact person: Kevin O'Donoghue

Position held in organisation: Parish Clerk

Contact email/telephone number: clerk@willerseyparishcouncil.org.uk

Project details

Please provide the following information regarding your project. You should attach supporting documents to this request such as quotations, etc.

1.
 - a. Planning application number from which you are requesting funds:
25/02687/FUL Terrafy Willersey
 - b. Name and purpose of the contribution in the S106 agreement:
Extension of village hall, improvements to recreation ground, improvements to cemetery
2. Please provide a brief description of the project:
 - 1.Village Hall extension & upgrades
 - 2.Recreation Ground improvements
 3. Cemetery improvements
 4. Land allocation for village shop or a financial contribution.
3. Please provide the location/address of the project:
 - 1.Village Hall, Main St. Willersey WR12 7PJ
 - 2.Recreation Ground, Badsey Lane Willersey WR12 7PR
 - 3.St.Peters Church, Church St. Willersey WR12 7PN
4. How will the project mitigate the impact of the development that these S106 funds were secured from?

1) Allotments

- This development is on former glebe land which, until this application, had been used for ages by villagers as allotments. In recent years residents have been discouraged from taking up the leases due to the classification of the land for development and the imposition of short term leases by the applicant.
- Nevertheless it has been a valuable community asset and an opportunity for the improvement of health and social well being of the community and its loss represents a significant reduction in local green infrastructure and community growing space. The land

allocated for biodiversity increase on the other side of the railway line in no way compensates for this loss.

- Willersey has a thriving Horticultural Society that holds a well attended annual show. The PC also regularly receives requests for the provision of allotments which it is unable to meet despite its statutory duty to do so.
- The loss of this land as a valuable community asset is contrary to Dec 2024 NPPF para 98c and also 98a & b which requires planning policy to provide the social, recreational and cultural facilities and services the community needs.
- This development will have a negative effect on the recreational facilities and the green infrastructure of the village contrary to INF7.
- We reference INF3 which supports the use of planning obligations to secure infrastructure facilities necessary to mitigate the impact of development.
- Policy EN2 which encourages developments that contribute positively to the character and sustainability of the area, including green infrastructure.
- Policy EN8 which promotes the protection and enhancement of biodiversity and natural assets, which allotments support.
- NPPF 96c which specifically mentions provision of allotments to enable and support healthy lives - planning policies and decisions should aim to achieve healthy, inclusive and safe places.

- We request the replacement of these allotments and suggest a reduced area be made available for rent by the PC e.g. 2 acres, provided it was suitably prepared i.e. fenced, car parking, water provision etc. with road access, 1 acre would be for cultivation. The applicant owns the adjacent land and is in a position to accede to this requirement.
- If the site is not fully prepared and available on a long term lease then we would request ownership of the land as it would make little sense for us, or users, to invest in land which could be removed from our control at relatively short notice.

2) Village Hall

- An increase of 60 dwellings represents an increase in village population of 150-180 residents i.e. an uplift of 15-18% v 2021 census.
- The village hall has been refurbished in the last few years but the main hall size is the same as when it was built in 1968 and is only just able to handle many village events. The kitchen and toilets are also outdated.
- The capacity with the stage in use is 95 people and the extra demand from this housing is a tipping point which will necessitate an expansion if the hall is to fulfil its purpose.

- Without this development the expansion & improvements are not necessary but with it the need becomes immediate and unavoidable.
- Therefore it is fair and reasonable that CDC secures the maximum possible contribution from the developer towards the cost.

Project Costing

Current footprint 346 sq.mtrs. ref. **17/01544/FUL**, 15% increase is 52 sq.mtrs.

The cost of a 15%, 52m² increase as calculated by Chat GPI for the Cotswolds is shown below.

Category	Mid Estimate	High Estimate
Construction 52m2	£135200	£166400
Professional fees	£16900	£24960
Surveys	£3500	£6,000
Planning Building Regs,	£2500	£4000
Contingency 10%	£15810	£20136
Total excl VAT	£173910	£221496

We have been informed by Newlands Homes that they will be applying for planning on W4B & there is also a current application for 30 homes 25/02983/FUL Folly View.

We expect to make additional S106 requests for these sites and any monies received will be used either singly or combined for a building expansion and upgrade of facilities including the kitchen, toilets and car parking.

3) Recreation Ground

- We note the intended provision on the development of a few pieces of equipment, however the age range catered for in our ground is far wider and the equipment more complex.
- The ground is within easy walking distance and it is clear there will be increased usage and demand directly resulting from the increase in population. This will require upgrading of surfaces around the equipment and more complex equipment.
- The ability to play ball games as well as play on the equipment will mean our ground continues to be the centre of recreational activity and will need improvements.
- We request £30k which is a sum compatible with previous S106 agreements.

4) Village Shop

- The village is in need of one since the two previous were closed, one due to the Post Office scandal and the other as a result of Covid. Both were otherwise financially viable. Demand is directly linked to the increase in population, especially of the elderly, and we note the number of bungalows in this application.
- The additional 30 dwellings will significantly increase demand for everyday goods.
- To make the development sustainable, we request that the scheme provides either (a) land for a community shop unit within or near the development, or (b) a financial contribution towards establishing such a facility elsewhere in the village by the PC which we estimate will cost £250k.
- If not through a planning application, then how will the village ever get one. The village garage has made an approved application 22/00237/FUL on the basis of the acknowledged demand but was unable to proceed due to the difficulties of the current usage.

5) Cemetery & other village infrastructure

- Residents tend to opt for internment in the cemetery and we see a direct link between an increase in population and an increase in long term demand on cemetery facilities.
- The PC has in the last few years spent considerable sums on expanding the cemetery, however to make the extension usable it requires an 85mtr tarmac path.

Project Cost

Chat gpt estimates £10k

1. Preparation (excavation, sub-base, edging): £25–£40 per m²
 2. Tarmac surfacing (base + wearing course): £35–£60 per m²
 3. Finishing (edgings, compaction, disposal): £10–£20 per m²
- Total typical range: £70–£120 per m² (excluding VAT).

Calculation for 85 m²

Low estimate (£70/m²): £5,950

High estimate (£120/m²): £10,200

The path would ensure that the extended cemetery is accessible and fit for purpose for both existing and new residents.

a. Total cost of project:

b. Amount of S106 funds you are requesting:

(if your organisation is able to reclaim the VAT please do not include any VAT costs in the amount you are requesting - please see guidance note 4)

Project costs of necessary infrastructure improvements resulting from the development

Allotment provision	Land or lease
Village Hall expansion & upgrades	£175k
Recreation Grd improvements	£30k
Village Shop provision	Land or £
Cemetery paths	£10k

5.

c. Please list your secured match funding, including the funds your own organisation will provide.

The Parish Council has reserves of c.£50k and is able to access PWLB loans. The funds from the S106 agreements with the potential 3 housing developments in the village will furnish the remainder.

N.B. Similar agreements:

- **17/00890/FUL Willow Green 2016 a voluntary agreement in lieu of S106, £60k for improvements to the Village Hall & £20k for the recreation ground.**
- **16/01572/FUL Folly View 30 homes in 2016 £40k for V.Hall & recreation ground.**
- **Construction costs have risen by 44% since 2016.**

Until we know which housing developments are proceeding we will not incur the costs of speculative architects work, QS costings etc. as the details of the required expansion are unknown.

d. Please list any match funding that has not yet been secured.
The Parish Council has funds, no other agency has been approached.

6. Please provide the estimated start and end dates of the project.
Start date: 2027
End date:2028
7. Please provide your planning permission reference (if applicable). See note 6 on page 4.

N/A
8. Please provide details of who will carry out the works
Willersey Parish Council
9. Please provide details of who will be responsible for future maintenance
Willersey Parish Council

Supporting documentation and Declaration

Please tick the boxes below to confirm that these documents have been included with your application:

- Bank statement showing the bank details (account and sort code) to transfer the funds. Note that the account has to be in the organisation's name. This documentation is not required if these details are already registered on our finance system.
- Quotation that matches the project costs given on this form. VAT must be listed separately.

I declare and confirm that (please tick the boxes below):

- I am authorised to make this application on behalf of the applicant organisation.
- The information given on this form and supporting documentation is correct to the best of my knowledge and belief.

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Martin Perks

From: clerk@willerseyparishcouncil.org.uk
Sent: 16 June 2026 17:25
To: Martin Perks
Cc: Tom Stowe; Gina Blomefield; 'BRADLEY, Cllr Tom'
Subject: Terrafy 25/02687/FUL

Hi Martin,

In light of the concerns expressed at the planning meeting regarding safe pedestrian access to the village school and village centre facilities e.g. pubs, churches, shop and village hall, the Parish Council wishes to comment as follows:

The improved pavement access from the development of 1.8 metres extends only as far as the Badsey Lane mini roundabout. The path to the village however, continues across the road by the side of the B4632 to the school and beyond.

This path is currently far less than 1 metre wide from the mini roundabout to Pikes Corner – see photos.

There will be approximately 15 primary school children walking to the village school and 8 secondary age walking to the Church St. coach pick up point for Campden School, and returning in the afternoons.

We consider that if the required pavement width is 1.8 metres on the northern edge of the B4632 for safety reasons then the same width is necessary on the B4632 eastern edge as it runs towards the school and into the village centre.

This pavement has been little used in the past but will become much more so with the new housing.

I would be grateful if this could be posted & brought to the attention of members as appropriate.

Regards Kevin



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Comments for Planning Application 25/02687/FUL

Application Summary

Application Number: 25/02687/FUL

Address: Land Parcel East Of Willersey Business Park Willersey Gloucestershire

Proposal: Residential development comprising 60 dwellings with associated roads, accesses, parking and servicing, open space, landscaping and drainage infrastructure

Case Officer: Martin Perks

Customer Details

Name: Consultee Chipping Campden Town Council

Address: Chipping Campden Town Council The Old Police Station High Street Chipping Campden Gloucestershire GL55 6HB

Comment Details

Commenter Type: Objection Comments

Stance: Customer objects to the Planning Application

Comment Reasons:

- Highway access and parking
- Other
- Over development

Comment: Chipping Campden Town Council reiterates its former Objection to this application on the grounds of overdevelopment in

a rural area lacking the necessary infrastructure. Our concerns are as follows:

1. Fresh Water Supply - Thames Water identify insufficient capacity in the existing network and request a condition preventing occupation until upgrades are complete or a phasing plan is agreed. This aligns with Parish Council concerns over low water pressure and capacity in the immediate and surrounding areas.

2. Allocation & Strategic Context - Wychavon DC confirm the site is allocated in the adopted Cotswold Local Plan. While principle is established, delivery conditions and mitigation remain necessary to ensure acceptable impacts on infrastructure, amenity, and environment.

The proposal is contrary to several key policies in the Cotswold District Local Plan 2011-2031, including- INF1 - Infrastructure Delivery - the area lacks sufficient infrastructure to support the proposed

development, including utilities, healthcare and education- INF2 - Social and Community Infrastructure - there is inadequate provision of essential

community services such as schools, libraries, and GP surgeries- INF3 - Sustainable Transport - the development would increase car dependency due to poor

public transport and unsafe walking / cycling routes- INF4 - Highway Safety - the local road network is unsuitable for increased traffic, particularly

HGVs, and poses safety risks- EN8 - Biodiversity & Biodiversity Net Gain (BNG) - at present, it is

considered that the proposed site plans would facilitate habitat fragmentation, which is significant at site level, fails to establish and promote the conservation and enhancement of ecological networks- EN14 - Managing Flood Risk - the flood risk has been underestimated, contrary to local evidence.

Also, with the additional separate application for 30 houses Land North of Folly View Broadway Road Willersey, 25/02983/OUT, this will only add further pressure on already inadequate infrastructure.

Summary

This application represents unsustainable overdevelopment in a rural area adjacent to the Cotswolds National Landscape. The local infrastructure-transport, utilities, education, health, and emergency services-is insufficient to support further growth

Cotswold District Council
Trinity Road
Cirencester
Gloucestershire
GL7 1PX

Highways Development
Management
Economy Environment and
Infrastructure
Shire Hall
Westgate Street
Gloucester
GL1 2TG

22 June 2026
Your ref: 25/02687/FUL-2
Ask for: Matthew Jopp

Dear Martin Perks

**TOWN AND COUNTRY PLANNING ACT 1990
(DEVELOPMENT MANAGEMENT PROCEDURE) (ENGLAND) ORDER 2015
ARTICLE 18 CONSULTATION WITH HIGHWAY AUTHORITY**

PROPOSAL: Residential development comprising 60 dwellings with associated roads, accesses, parking and servicing, open space, landscaping and drainage infrastructure
LOCATION: Land Parcel East Of Willersey Business Park Willersey Gloucestershire
APPLICANT: Gloucester Diocesan Board Of Finance

Gloucestershire County Council, the Highway Authority acting in its role as Statutory Consultee has undertaken a full assessment of this planning application. Based on the appraisal of the development proposals the Highways Development Management Manager on behalf of the County Council, under Article 18 of the Town and Country Planning (Development Management Procedure) (England) Order, 2015 has **no objection subject to conditions and financial obligations.**

The justification for this decision is provided below.

Gloucestershire County Council, acting in its role as Local Highway Authority and Statutory Consultee, has undertaken a full and updated assessment of the above planning application. This includes consideration of the submitted Transport Statement and Residential Travel Plan, subsequent technical drawings (including access, footway and off-site works), and the matters raised by Members, the Parish Council, and other stakeholders following Committee.

Having also undertaken a site visit following transfer of the case from my predecessor, and having reviewed the available evidence including traffic speeds, collision data, accessibility, and proposed mitigation, the Highway Authority confirms that its position remains that there is no objection, subject to conditions and appropriate planning obligations.

The site is allocated for development within the adopted Local Plan and has been the subject of previous permissions which establish the principle of development and its broad transport impacts. The current application is supported by a Transport Statement, the conclusions of which are accepted. The development is forecast to generate a modest level of traffic that would not result in a severe residual cumulative impact on the highway network, nor give rise to an unacceptable impact on highway safety in accordance with the National Planning Policy Framework.

The proposed site access has been assessed based on observed vehicle speeds, which are consistent across surveys undertaken in 2021 and 2025 and confirmed through site observation. The design incorporates appropriate visibility splays based on these measured speeds, and there is no evidence of a personal injury collision pattern along this section of the B4632 that would indicate an inherent safety issue. The road functions appropriately as a Class B distributor route and, while it accommodates HGV traffic, this is characteristic of its role and does not in itself indicate unsuitability.

In terms of pedestrian connectivity, the development provides a compliant and deliverable improvement through the construction of a new footway link connecting the site to the Pike mini roundabout. This is designed to a width of 2 metres, with localised pinch points of no less than 1.8 metres and can be delivered entirely within the adopted highway or land controlled by the applicant. In addition, crossing improvements in the form of a raised table with tactile paving are proposed adjacent to the roundabout. These works have been accepted in principle by the Highway Authority and will provide a meaningful and policy-compliant enhancement to pedestrian access.

It is acknowledged that beyond the roundabout, the existing footway towards the village centre is substandard in width in places. However, this section forms part of the established village network and serves existing users as well as future residents. While improvements in this location would be desirable, it would not be reasonable or proportionate to require comprehensive widening of the route through this development alone. Opportunities for localised improvements can continue to be explored separately where feasible.

The proposed off-site works form a comprehensive package of highway safety improvements, including amendments to the speed limit regime, gateway features, traffic calming, pedestrian signing, a vehicle activated sign, and lining/surfacing upgrades. These works represent a coordinated response to the development and provide a clear safety benefit.

Parking provision has been reviewed against the Manual for Gloucestershire Streets and is compliant. The development meets parking standards without reliance on garage spaces, providing confidence that overspill parking will not arise.

The Residential Travel Plan provides a structured framework for encouraging sustainable travel, supported by monitoring and a review mechanism over five years, ensuring impacts are managed over time.

Public transport improvements will be directed to functional stops at "The Pike", with cost estimates in the range of approximately £13,600 to £23,600 depending on final specification and delivery constraints.

Education transport contributions are required to mitigate the impact of the development on school transport provision for both primary and secondary phases.

Taking all matters into account, the Highway Authority concludes that the development would not result in an unacceptable impact on highway safety nor a severe residual cumulative impact. There are therefore no justifiable grounds on which an objection could be sustained.

Recommended Planning Obligations (S106)

A Section 106 Agreement should secure:

- Travel Plan Monitoring Fee: £5,000
- Travel Plan Bond/Deposit: £28,200
- Education transport contribution: £58,710
- Bus stop improvements: up to £23,600, with a minimum deliverable package of £13,600, final scope to be agreed
- Traffic Regulation Order contribution: approximately £15,000
- Delivery of all off-site highway works

The planning obligations sought in connection with this development have been assessed against the tests set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended). Each obligation is necessary to make the development acceptable in planning terms, as they directly mitigate identified impacts arising from the development, including increased demand on the transport network, school transport provision, and sustainable travel infrastructure. The obligations are directly related to the development, as they address impacts attributable to the proposed dwellings and their associated travel demand. They are also fairly and reasonably related in scale and kind, reflecting the scale of the development, its location, and the extent of mitigation required. Taken together, the overall package of S106 contributions represents a proportionate and policy-compliant response to the development's transport impacts, with no unnecessary or unrelated requirements included.

Recommended Planning Conditions

1. Conformity with Submitted Details - The Development hereby approved shall not be occupied until the access, parking and turning facilities have been provided as shown on drawing 24.050.105 Rev. 9 (March 2025). Reason: To ensure conformity with submitted details.
2. Provision of Vehicular Visibility Splays - The development hereby approved shall not be occupied until visibility splays are provided in accordance with drawing 241030-RAP-XX-XX-DR-TP-3200 Rev. P03. These splays shall thereafter be permanently kept free of all obstructions to visibility over 0.6m in height above carriageway level. Reason: In the interests of highway safety.
3. Provision of Pedestrian Visibility Splays - The Development hereby approved shall not be occupied until pedestrian visibility splays of 2m x 2m measured perpendicularly back from the edge of carriageway have been provided on both sides of each driveway. These splays shall thereafter be permanently kept free of all obstructions to visibility over 0.6m in height. Reason: To ensure motorists have clear visibility of pedestrians.
4. Completion of Vehicular Access – Shown on Approved Plans - The development hereby approved shall not be occupied until the means of access for vehicles, pedestrians and cyclists have been constructed and completed as shown on drawing

241030-RAP-XX-XX-DR-TP-3200 Rev. P03. Reason: In the interest of highway safety.

5. Highway Improvements / Off-site Works - The Development hereby approved shall not be occupied until the off-site highway works comprising:

a. Footway provision and pedestrian crossing improvements as shown on drawing 241030-RAP-XX-XX-DR-TP-6003 Rev. P01 (January 2026)

b. Speed management, gateway features, traffic calming and associated works as shown on drawing 241030-RAP-XX-XX-DR-TP-6002 Rev. P01 (January 2026)

have been constructed and completed. Reason: To ensure the safe and free flow of traffic onto the highway.

6. Bicycle Parking - The Development hereby approved shall not be occupied until secure bicycle parking has been provided in accordance with approved details. Reason: To promote sustainable travel.

7. Prior to commencement of the development hereby permitted details of a construction management plan shall be submitted to and approved in writing by the Local Planning Authority. The approved plan shall be adhered to throughout the demolition/construction period. The plan/statement shall include but not be restricted to:

a. 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);

b. Advisory routes for construction traffic;

c. Any temporary access to the site;

d. Locations for loading/unloading and storage of plant, waste and construction materials;

e. Method of preventing mud and dust being carried onto the highway;

f. Arrangements for turning vehicles;

g. Arrangements to receive abnormal loads or unusually large vehicles;

h. Highway Condition survey;

i. Methods of communicating the Construction Management Plan to staff, visitors and neighbouring residents and businesses.

Reason: In the interests of safe operation of the adopted highway in the lead into development both during the demolition and construction phase of the development.

The recommended planning conditions have been assessed against the six tests set out in paragraph 56 of the National Planning Policy Framework and the Planning Practice Guidance. Each condition is considered to be necessary to make the development acceptable in planning terms, particularly in relation to highway safety, access, and the delivery of mitigation measures. The conditions are relevant to planning and to the development, as they directly relate to the proposed scheme and its interaction with the highway network. They are precise and enforceable, referencing approved drawings and clearly defined requirements where appropriate. Finally, they are reasonable in all other respects, ensuring that they do not place undue or disproportionate burdens on the applicant while securing appropriate and policy-compliant mitigation.

Informatives

Works on the Public Highway

The development hereby approved includes the carrying out of work on the adopted highway. You are advised that before undertaking work on the adopted highway you

must enter into a highway agreement under Section 278 of the Highways Act 1980 with the County Council, which would specify the works and the terms and conditions under which they are to be carried out.

Contact the Highway Authority's Legal Agreements Development Management Team at highwaylegalagreements@gloucestershire.gov.uk allowing sufficient time for the preparation and signing of the Agreement. You will be required to pay fees to cover the Councils costs in undertaking the following actions:

- Drafting the Agreement
- A Monitoring Fee
- Approving the highway details
- Inspecting the highway works

Planning permission is not permission to work in the highway. A Highway Agreement under Section 278 of the Highways Act 1980 must be completed, the bond secured and the Highway Authority's technical approval and inspection fees paid before any drawings will be considered and approved.

Traffic Regulation Order (TRO)

You are advised that a Traffic Regulation Order (TRO) is required. You must submit a plan to scale of an indicative scheme for a TRO, along with timescales for commencement and completion of the development. Please be aware that the statutory TRO process is not straightforward; involving advertisement and consultation of the proposal(s).

You should expect a minimum of six months to elapse between the Highway Authority's TRO Team confirming that it has all the information necessary to enable it to proceed and the TRO being advertised. You will not be permitted to implement the TRO measures until the TRO has been sealed, and we cannot always guarantee the outcome of the process.

We cannot begin the TRO process until the appropriate fee has been received. To arrange for a TRO to be processed contact the Highway Authority's Legal Agreements Development Management Team at highwaylegalagreements@gloucestershire.gov.

Highway to be Adopted

The development hereby approved includes the construction of new highway. To be considered for adoption and ongoing maintenance at the public expense it must be constructed to the Highway Authority's standards and terms for the phasing of the development. You are advised that you must enter into a highway agreement under Section 38 of the Highways Act 1980. The development will be bound by Sections 219 to 225 (the Advance Payments Code) of the Highways Act 1980.

Contact the Highway Authority's Legal Agreements Development Management Team at highwaylegalagreements@gloucestershire.gov.uk. You will be required to pay fees to cover the Councils cost's in undertaking the following actions:

- Drafting the Agreement
- Set up costs
- Approving the highway details
- Inspecting the highway works

You should enter into discussions with statutory undertakers as soon as possible to co-ordinate the laying of services under any new highways to be adopted by the Highway Authority.

The Highway Authority's technical approval inspection fees must be paid before any drawings will be considered and approved. Once technical approval has been granted a Highway Agreement under Section 38 of the Highways Act 1980 must be completed and the bond secured.

No Drainage to Discharge to Highway

Drainage arrangements shall be provided to ensure that surface water from the driveway and/or vehicular turning area does not discharge onto the public highway. No drainage or effluent from the proposed development shall be allowed to discharge into any highway drain or over any part of the public highway.

Protection of Visibility Splays

The applicant's attention is drawn to the need to ensure that the provision of the visibility splay(s) required by this consent is safeguarded in any sale of the application site or part(s) thereof.

Travel Plan

The proposed development will require a Travel Plan as part of the transport mitigation package (together with a Monitoring Fee and Default Payment) and the Applicant/Developer is required to enter into a legally binding Planning Obligation Agreement with the County Council to secure the Travel Plan.

Gloucestershire County Council has published guidance on how it expects travel plans to be prepared, this guidance is freely available from the County Councils website. As part of this process the applicant must register for Modeshift STARS and ensure that their targets have been uploaded so that progress on the implementation of the Travel Plan can be monitored.

Modeshift STARS Business is a nationally accredited scheme which assists in the effective delivery of travel plans, applicant can register at www.modeshiftstars.org

Construction Management Plan (Advisory)

It is expected that contractors are registered with the Considerate Constructors scheme and comply with the code of conduct in full, but particularly reference is made to "respecting the community" this says:

- Constructors should give utmost consideration to their impact on neighbours and the public
- Informing, respecting and showing courtesy to those affected by the work;
- Minimising the impact of deliveries, parking and work on the public highway;
- Contributing to and supporting the local community and economy; and
- Working to create a positive and enduring impression and promoting the Code.

The CEMP should clearly identify how the principal contractor will engage with the local community; this should be tailored to local circumstances. Contractors should

also confirm how they will manage any local concerns and complaints and provide an agreed Service Level Agreement for responding to said issues.

Contractors should ensure that courtesy boards are provided, and information shared with the local community relating to the timing of operations and contact details for the site coordinator in the event of any difficulties. This does not offer any relief to obligations under existing Legislation.

Conclusion

Subject to the above conditions and obligations, the Highway Authority confirms that the development is acceptable in highway terms and that a recommendation of no objection is appropriate.

Yours Sincerely

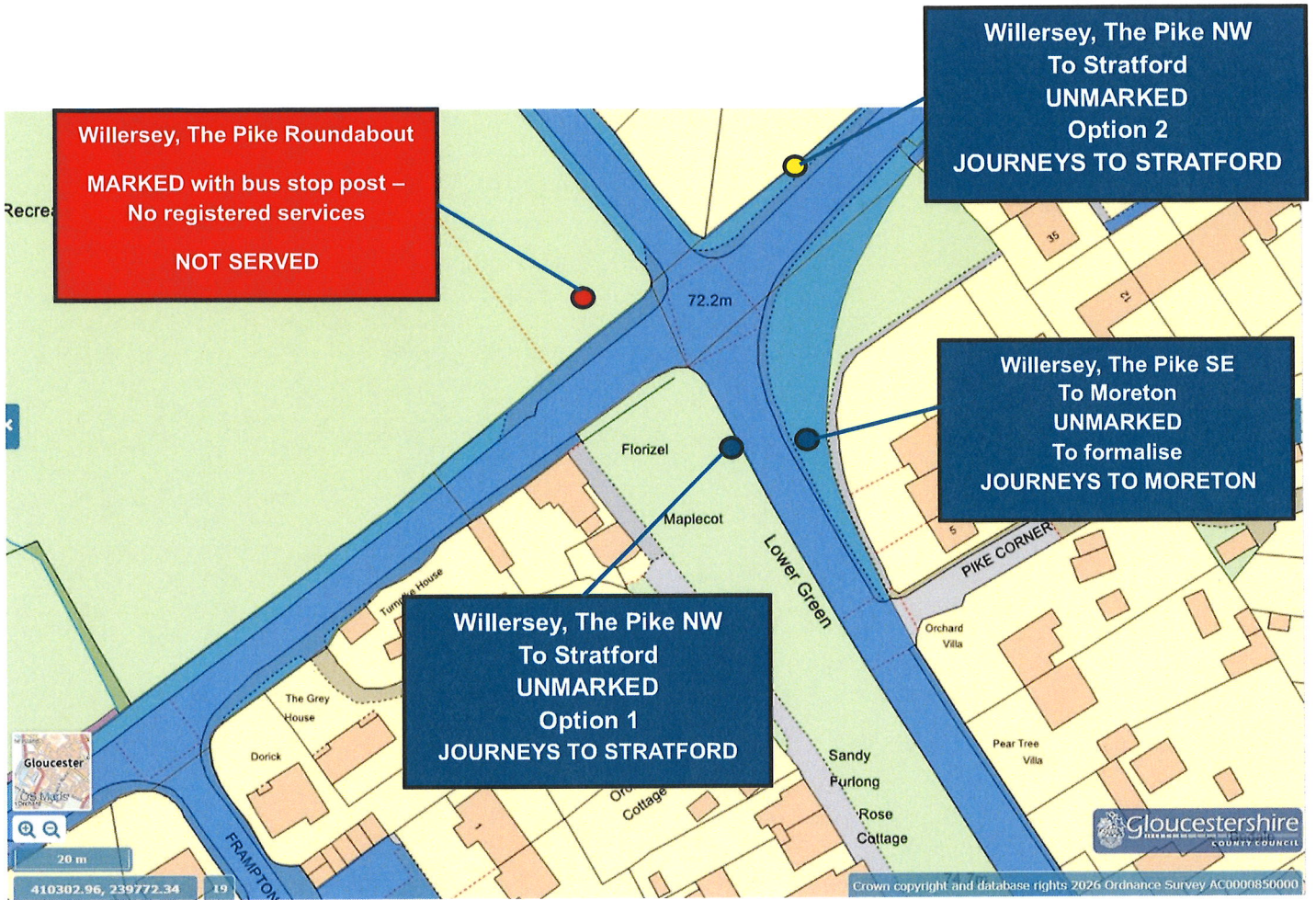
Matthew Jopp
Principal Highway Development Officer

Willersey, The Pike NW
To Stratford
UNMARKED
Option 2
JOURNEYS TO STRATFORD



Willersey, The Pike Roundabout
MARKED with bus stop post –
No registered services
TO REMOVE





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Outline application for 50 dwellings, plus associated infrastructure and landscaping. All matters reserved except access at Land To The East Of Nostle Road Nostle Road Northleach Gloucestershire

Outline Application 26/00613/OUT	
Applicant:	The Farmington Trust Limited
Agent:	Spirit Architecture
Case Officer:	Martin Perks
Ward Member(s):	Councillor Tony Dale
Committee Date:	8 July 2026
RECOMMENDATION:	PERMIT subject to no objection from Biodiversity Officer (and any associated conditions), completion of a S106 legal agreement covering the provision of affordable and self-build/custom build housing, Biodiversity Net Gain Monitoring and financial contributions to secondary (16-18) education, library services, school transport, bus stops and a travel plan.

1. Main Issues:

- (a) Residential Development in a Development Boundary
- (b) Housing Mix and Affordable Housing
- (c) Impact on the Character and Appearance of 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 for the purposes of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

3. Site Description:

- 3.1 This application relates to an area of agricultural land located adjacent to the eastern edge of the town of Northleach. The application site measures approximately 2.7 hectares in size and consists of an agricultural field which measures approximately 2.2 hectares and an area of woodland/scrub located to its north which measures approximately 0.5 hectares in size. The agricultural field is currently set to grass. The site occupies a sloping area of land which drops in level from its north/north-west to its south-eastern corner. Land levels drop approximately 14-15m across the site.
- 3.2 The application site is bordered by agricultural fields to its north and east. The agricultural land to the north of the site is at a higher level than the application site. The western boundary of the application site adjoins a post war housing development (Nostle Road). The eastern edge of the aforementioned development is defined by a residential estate road and 3 dwellings and their associated gardens. The southern boundary of the application site lies adjacent to a Class C highway (East End). The aforementioned boundary is defined by a 1-1.5m high drystone wall and vegetation. To the south of the aforementioned highway is 21st century housing development and a field. The field sits at a lower level than the road, with its roadside boundary defined by a Cotswold stone retaining wall.
- 3.3 The application site is located within Northleach Development Boundary as designated in the Cotswold District Local Plan 2011-2031. The aforementioned boundary extends along the northern and eastern boundaries of the application site. In addition, the application site is allocated for residential development in the Local Plan under Policy S12. The site has reference N_14B Land adjoining East End and Nostle Road (17 dwellings net).
- 3.4 The site is located within the Cotswolds National Landscape.
- 3.5 The site is located within Flood Zone 1.
- 3.6 Public Right of Way KNE15 extends diagonally across the field located to the south of the application site.
- 3.7 The application site is located outside Northleach Conservation Area. The boundary of the conservation area is located approximately 175m to the west of the application site. The nearest listed building to the site is the Grade II listed Northleach Hospital which is located approximately 180-190m to the west of the proposed development.

- 3.8 A line of 7 trees located in a grass verge lying along the southern side of East End to the south and south-west of the application site are subject to Tree Preservation Orders.

4. Relevant Planning History:

Application Site

- 4.1 24/02650/OUT Outline planning application (all matters reserved) for the erection of 9No. dwellings. Withdrawn 2024
- 4.2 25/02874/SCR Request for a formal EIA Screening Opinion for Outline Planning Application for the erection of 48 dwellings (all matters reserved except access) plus infrastructure and associated works. EIA Not Required 2025
- 4.3 26/00237/SCR Request for a formal EIA Screening Opinion for Outline Planning Application for the erection of 50 dwellings (all matters reserved except access) plus infrastructure and associated works. EIA Not Required 2026

Land to south of East End

- 4.4 14/02212/OUT Outline application for residential development of up to 50 dwellings. Refused 2014
- 4.5 14/04274/OUT Outline application for residential development of up to 40 dwellings. Permitted 2015
- 4.6 16/03403/REM Erection of 40 dwellings and associated works (Reserved Matters application relating to Outline permission 14/04274/OUT). Approved 2016
- 4.7 17/00700/REM Variation of Condition 1 (plan numbers) of approval 16/03403/REM to enable re-positioning of southern access road and adjacent dwellings. Approved 2017
- 4.8 17/03247/REM Erection of 6 dwellings and detached garages (amendment to the design of garages on Plots 30 and 31, installation of roof lantern in Plot 40 and rooflights in Plots 25, 26 and 27) approved under Reserved Matters approval 17/00700/REM. Approved 2017

Land to west of application site

- 4.9 CD.3408/A Outline application for residential development on 2.4 hectares. Construction of a new vehicular and pedestrian access. Refused 1986
- 4.10 CD.3408/B Outline application for residential and light industrial development. Construction of a new vehicular and pedestrian access. Permitted 1987
- 4.11 CD.3408/B/AP Erection of 49 dwellings and garages. Construction of a new vehicular and pedestrian access. Permitted 1988
- 4.12 CD.3408/C Erection of 60 dwelling units comprising of 51 houses and 9 bungalows. Provision of garaging and parking. Construction of a new vehicular and pedestrian access. Refused 1987
- 4.13 CD.3408/D Erection of 19 dwelling units with associated garaging and car parking. Construction of a new vehicular and pedestrian access. Refused 1988. Appeal Allowed 1989 (APP/F1610/A/88/111481)

5. Planning Policies:

- DS1 Development Strategy
- DS2 Dev within Development Boundaries
- 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
- EN10 HE: Designated Heritage Assets
- EN14 Managing Flood Risk
- EN15 Pollution & Contaminated Land
- INF1 Infrastructure Delivery
- INF2 Social & Community Infrastructure
- INF3 Sustainable Transport
- INF4 Highway Safety
- INF5 Parking Provision
- INF8 Water Management Infrastructure
- S12 S12 - Northleach
- NPNE N'LEACH/EASTINGTON NP 2018-2030

- NPNE3 NE3:Design Built & Natural Environment

6. Observations of Consultees:

- 6.1 Gloucestershire County Council Highways: No objection subject to conditions and financial contributions of £28,100 to bus stop infrastructure; £28,500 to a travel plan and £20,580 Home to school transport
- 6.2 Gloucestershire County Council Lead Local Flood Authority: No objection subject to condition.
- 6.3 Gloucestershire County Council Community Infrastructure: Requests a financial contribution of £63,918 to secondary (16-18) education and £9,800 to library services.
- 6.4 Gloucestershire County Council Archaeology: No objection
- 6.5 Biodiversity Officer: Further information requested.
- 6.6 Housing Officer: Comments incorporated into report.
- 6.7 Tree Officer: No objection subject to conditions.
- 6.8 Environmental and Regulatory Services Contamination: No objection subject to conditions.
- 6.9 Environmental and Regulatory Services Air Quality: No objection subject to conditions.
- 6.10 NHS Gloucestershire: No response to date
- 6.11 Thames Water: No objection subject to water supply condition.

7. View of Town Council:

- 7.1 Response received on the 3rd April 2026:

Summary:

Northleach with Eastington Town Council raises no objection to the principle of development of this site which is allocated for residential development in the adopted Cotswold District Local Plan 2011 - 2031. Policy S12 Northleach

allocates site N_14B (Land adjoining East End and Nostle Road) with an indicative capacity of 17 dwellings. However, the Council has serious concerns about the current proposal for 50 dwellings, which is not in accordance with the Local Plan and represents an overdevelopment of the site. The proposal substantially exceeds the scale and form envisaged and fails to respond appropriately to the site's constraints, particular in terms of landscape and sewage capacity.

1. Amount of development

1.1 The applicant's Planning Statement (paragraph 6.6) seeks to justify an increase in the capacity of the site from 17 to 50 dwellings to address the district's acute housing and affordability pressures and to assist in meeting the district's objectively assessed need for the next plan period up to 2046'.

1.2 We cannot agree with the applicant's justification for increasing the capacity of the site to 50 dwellings on the basis of housing need. While the Government's housing targets and desire to boost housing supply are acknowledged, this is a strategic, district-wide issue and does not in itself justify development at a scale that is inappropriate to an individual site.

1.3 Although the SHELAA Update of October 2021 considers that site N1_4B may have capacity greater than originally identified, it identifies a potential increase to 35 dwellings, based on standard density assumptions and a clear recognition of the site's landscape constraints. The proposal for 50 dwellings therefore significantly exceeds not only the original Local Plan allocation, but also the new upper range identified in the SHELAA evidence.

1.4 While the absence of a five-year housing land supply is noted, which tilts the balance in favour of sustainable development as set out in the NPPF, it should not be allowed to overshadow other relevant policies and material considerations. The presumption in favour of sustainable development does not support the maximisation of housing numbers at the expense of site constraints, design quality and infrastructure capacity. The key issue is not whether the site should be developed, but whether it can accommodate development at the scale proposed without giving rise to unacceptable harm.

1.5 The Local Plan allocation does not simply identify the site for housing, but also establishes a site-specific framework for its development, including an indicative capacity and design approach reflecting its landscape sensitivity and role in forming a softer edge to the settlement. These aspects of the policy are concerned with the form and quality of development, rather than the overall

supply of housing, and therefore remain relevant and should be afforded weight in the planning process.

1.6 In addition, the site lies within the Cotswolds National Landscape, where great weight should be given to conserving and enhancing their landscape and scenic beauty when considering development proposals, in accordance with NPPF paragraph 189.

1.7 The recommendations in the Northleach Site Assessments SHELAA (2021) are:

Should N14B be developed, the scheme should:

- improve the eastern gateway into Northleach through sensitive design and the development must respect and reflect the local character with a very high design standard;*
- create a soft edge to the settlement that improves the transition between the built-up area and the surrounding countryside;*
- not extend the line of houses beyond the line of built form of the recently completed 40 dwelling development to the south;*
- include a large area of public open space on the part of the site which does not accommodate housing development, which should contribute towards the delivery of the Green Infrastructure ring around the town; include a footpath; SuDs; substantial areas of tree planting and other features to enhance biodiversity.*
- retain and enhance the woodland belt along the northern boundary; and*
- create a treed boundary along the eastern and southern boundaries to break up the development form, as well as trees throughout the development*

1.8 The proposal before us conflicts with the site-specific recommendations, notably the extent of the built form beyond the estate opposite, and the absence of the expected area of public open space, and would need to be amended to achieve compliance with them.

1.9 We note that, based on the applicant's documents, in pre-application advice the Local Planning Authority requested a scheme be developed for the whole site N_14B with an increase in housing numbers in line with changes in

national planning policy. This would appear to be a response to the piecemeal approach taken in a previous application, 24/02650/OUT, now withdrawn. However, this advice does not override the landscape constraints, site-specific policy framework, or statutory duties and should not be interpreted as justifying development that exceeds the site's capacity.

1.10 In this context, it will be necessary for the applicant to clearly explain what assessment has led to the conclusion that the site can accommodate 50 dwellings, and why this does not give rise to unacceptable harm having regard to the constraints previously identified. It is important that factors specific to this site are given appropriate weight in the assessment, to ensure that any decision on this application is well-founded and reasonable.

2. Access and highway safety

2.1 The Town Council requests that the Highway Authority fully assesses the safety and functionality of the proposed access under future conditions, when on-street parking is likely to increase, and that any necessary mitigation measures are identified.

2.2 We also draw attention to the transition from the existing 30mph speed limit to 60mph, which occurs approximately halfway along the southern boundary of the site. The Council requests that the Highway Authority considers extending the 30mph zone or introducing other traffic calming measures to ensure the safety of future residents.

2.3 Following these assessments, it is expected that any necessary mitigation measures would be secured through planning conditions and, where appropriate, Section 278 agreements.

3. Housing mix and affordable housing

3.1 The Town Council would like homes to be provided for young families. Much of the open market housing built in Northleach in the last 30 years has been larger four- or five-bedroom properties. The 2021 Census showed that Northleach is now overprovided with larger, more expensive homes, compared to the district average. These often attract retirees downsizing from London and are simply not affordable for families starting out. Northleach Primary School numbers have fallen over the past 15 years, and now stand at 115 pupils, down from about 180, which indicates that the housing needs of young families are not being met.

3.2 *The Town Council supports the provision of affordable housing but stresses the need for the right amount and housing mix. While Northleach has good local services, including shops, Post Office, doctors' surgery and primary school, opportunities for local employment are limited. Future residents will need to travel to access employment and wider support services, which creates a risk of social and economic isolation if the housing mix is not aligned with local needs. Furthermore, if the housing mix policy in relation to dwelling size is applied to the whole scheme, the current structural problem will be perpetuated of delivering smaller homes as 'affordable' housing i.e. social rent or shared ownership, alongside larger, expensive open market housing.*

3.3 *Following feedback from the public consultation, the developer proposed increasing the numbers of smaller properties as 'shared ownership' rather than 'social rented'. We do not believe this will address the identified issue of high local property prices. Shared ownership is unpopular and failing to deliver an affordable route to homeownership, according to Government reports. Many young couples and families starting out do not qualify for social rent, and would like to purchase their own property.*

3.4 *The Town Council seeks a balanced, sustainable community where people with local connections have genuine opportunities to purchase their first home. To better meet local need, the scheme should include a greater proportion of First Homes alongside a larger number of 2- and 3-bedroom properties for sale on the open market, ensuring homes are available for young couples and families. The evidence set out above supports this approach.*

3.5 *Additionally, the Town Council is keen that to ensure the houses don't become holiday lets and are lived in by people who want to become part of our community. We would welcome any mechanism that could help to secure this outcome.*

4. Landscape and visual impact

4.1 *The landscape sensitivity of the development site is considered medium to high/medium, in the Study of land surrounding Key Settlements in Cotswold District: Update (2014). Although the site is screened from wider views, the estate will be highly visible and dominate the view of Northleach when approaching from the east.*

4.2 *In the evaluation of landscape sensitivity, the N_14B site assessment states: "Housing development here would only be acceptable if it was carried out to a very high standard to create a more pleasing indented and varied edge*

to the settlement on this side.....Development should not venture east beyond the settlement edge created to the south by the recently completed development. The east of the parcel could be utilised for community benefit and the enhancement of Green Infrastructure provision."

4.3 As noted earlier, the proposal allocates housing across the whole site, taking the residential boundary past the settlement edge of the estate to the south, and leaving minimal space for green infrastructure and community benefit. While the proposal shows some attempt to provide a soft edge, the limited tree and shrub planting will be insufficient to provide adequate screening. Improved landscaping, likely requiring a lower density, will be necessary to integrate the development sensitively into the valley setting.

4.4 The proposal emphasises a landscape contribution through the creation of a section of the Circular Route or Green Ring aspiration in the Northleach Neighbourhood Plan. However, surrounding fields (which are also owned by the applicant) have recently been fenced off, preventing a continuous route and undermining the Green Ring concept. It should be noted of course that a permissive path can be withdrawn at any time. Northleach has previous experience where a developer promised public access to the surrounding countryside - through the 40-dwelling site opposite - but those estate paths are now designated as private. Accordingly, no weight can be given to the creation of the Circular Route unless public access is secured through a legal mechanism, such as a public right of way.

5. Flood risk and drainage

5.1 The site is predominantly Fuller's Earth (clay), with some areas of permeable limestone; this geology significantly limits natural infiltration. When clay becomes saturated, springs emerge and can persist for some time. Local knowledge indicates that the field is frequently waterlogged, with springs emerging from the upper slopes that will require ongoing management. "It is well known that you can lose your boots in that field". There is significant potential for surface water to overwhelm drainage systems if not adequately addressed.

5.2 Residents of nearby properties have reported existing issues, including water rising in their gardens from natural springs and flooding of the roads adjacent to the site. The drainage gully on the Nostle Road junction has been filled in and water coming down East End / the London Road often discharges into the field opposite. Any development must provide robust, long-term

management of surface water and runoff to prevent recurrence of flooding on the site itself and of neighbouring properties and roads.

5.3 Numerous residents have also raised concerns with the Town Council about the capacity of the sewage system to cope with an additional 50 dwellings. The sewage system was designed and built in the 1950s when Northleach was about one third of the size it is today and their concern appears to be well founded.

5.4 In a letter tucked away at the end of the Flood Risk Assessment, Thames Water writes that "the receiving network is served by Northleach STW [sewage treatment works] and there isn't capacity to serve the development currently." Thames Water requests a condition is attached to any planning permission for this site preventing occupation of the properties until all sewage works upgrades are finished, or a housing and infrastructure phasing plan is agreed, to avoid sewage flooding and/or potential pollution incidents.

5.5 Lack of sewage system capacity in Northleach was already known when Local Plan Policy S12 was adopted, as it states: "For site N_14B, developers will be required to demonstrate that there is adequate waste water and water supply capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. Developers may need to fund studies to ascertain whether the proposed development will overload existing water infrastructure."

5.6 However, the applicant does not address this issue directly. They appear to be proposing a "temporary" private sewage treatment plant on site, disclosed only in a technical drawing (Drawing No. 25190/01). We believe that such a plant has no precedent and would face substantial regulatory hurdles. Planning Practice Guidance requires developers to connect to the public sewer where it is available. We refer to the detailed comment by James Oxley which lays out concerns about this proposal and the lack of transparency around it.

5.7 Thames Water is in serious financial difficulties, with sewage discharges regularly occurring across its network. The failings of the Northleach sewage treatment works were recently highlighted in the Channel 4 docudrama 'Dirty Business'. Yet there are currently no plans to upgrade the facility. It would be reckless to assume Thames Water would be able to complete an upgrade of the local sewage treatment works in the next three years. A "temporary" sewage treatment works as proposed by the applicant cannot be considered temporary when there is no viable plan to connect to the public sewer system.

5.8 *Given the above concerns and because adequate wastewater capacity has not been demonstrated as required by Policy S12, the Council believes it is essential that, should planning permission be granted, then a condition is applied that restricts construction until a clear delivery plan for sewage capacity upgrades is in place.*

6. Biodiversity and ecology

6.1 *The development could result of loss of biodiversity on-site, and while mitigation is proposed, the pond appears primarily intended for flood management rather than ecological or amenity purposes. The Biodiversity Net Gain Assessment accepts that biodiversity enhancements will need to be made off site, either by utilising the adjacent land to the north of the Site, or through the purchase of off-site biodiversity units from a commercial habitat bank. Other than an outline on a Habitat Plan, little information is provided on how biodiversity enhancements will be delivered, or how they will be secured in the longer term. We question whether this gives sufficient certainty that the required 10% net gain in biodiversity will be achieved in compliance with the Environment Act 2021.*

7. Infrastructure and planning obligations

(a) Space for a playground within the development

7.1 *The Fields in Trust Standards for children's play state that "every home should have access to play space within 100 metres," otherwise known as Local Areas for Play (LAP). The indicative landscape plan for the proposed development does not clearly allocate a Local Area for Play. The legend states that "naturalistic areas of play [are] to be incorporated as required," but no specific areas are identified. While the layout is indicative, the available open spaces - the south-east area with a balancing pond, the sloping scrubland behind the houses, and the tree-lined north-east section - appear constrained and unsuitable for children's play. The Town Council therefore requests that provision for a children's playground is explicitly considered at the reserved matters stage, noting that this is more likely to be achievable if the density of development is reduced.*

(b) Creation of a visitor car park

7.2 *The proposed development of 50 new dwellings on the edge of the town will generate additional demand for parking in the town centre. While the distance of just over half a mile is walkable for some, it is likely that a significant*

proportion of trips to access local shops and services will be made by private car. This will lead to an intensification of existing on-street parking pressures in the town centre and nearby residential streets.

7.3 The creation of an off-site public car park, as envisaged in the Northleach Neighbourhood Plan and supported by Policy S12 of the Local Plan, is therefore necessary to mitigate the impact of the development on local parking availability and maintain safe and convenient town centre access for all users. The Town Council therefore requests that, should planning permission be granted, the developer makes a binding commitment towards the provision of an off-site public car park, either by constructing a public car park on land within its ownership as described in Neighbourhood Plan Policy NE1, or by providing a financial contribution to enable the delivery of such a facility.'

8. Other Representations:

8.1 Approximately 61 objections, 2 support and 1 general comments received.

8.2 Main grounds of objection are:

i) The town's infrastructure cannot cope with anymore additional dwellings. The sewers/drainage is inadequate. The main road through the town cannot cope with more traffic. Parking is a nightmare at the moment. Local amenities are insufficient.

ii) If there was another small shop or a garage with this development I think it would be good. But as it stands there is not, this town simply cannot cope now with the amount of people & cars here. Let alone adding another 50 houses.

iii) How will the surgery, the shop, the chemist cope with this?

iv) You can barely park in the town square now let alone with 50 extra houses in Northleach. The High Sstreet is already packed with cars. It's just completely unnecessary.

v) There are no details specified in the planning application of how the new houses will look. There are no architect design drawings, and there are no specifications of the building materials that will be used in the construction of the houses. In such a planning application one would normally expect to see clearly presented a full architectural design of the proposed housing, together

with full building material specifications, for the constructions that form the housing development project to be considered for approval.

vi) There are no details specified in the planning application of how the sewage and foul water coming from the new houses will be routed to the Northleach Waste Water Treatment Works on the River Leach. One would normally expect to see presented a detailed drawing of the sewage & foul waste pipeline route, together with details of the pumping station, the sewage pipeline's capacity, and quantifying its usage when the housing development is completed.

vii) Northleach has an ageing sewage and wastewater infrastructure managed and operated by Thames Water. Sewage and foul water waste from the Town's households, together with storm overflows, flow down to the Northleach Sewage Pumping Station in Eastington Road. They are then pumped across the River Leach to the Northleach Wastewater Treatment Works where they are chemically treated before being released into the River Leach. Statistics provided by the Environment Agency showed that there were regular failures in the Northleach water treating process. In the period 2021-24, raw sewage was discharged 64 times by Thames Water into the River Leach in Northleach. Today, Thames Water act as an "operator self-monitoring" and do not accurately report spillages; the quantity of raw sewage now entering the River Leach is estimated to be 50% greater than in 2024. Adding another 50 dwellings to this drainage system risks breaking the system, causing raw sewage releases particularly in the area of the Cotswold Medical Practice & The Westwoods Centre in Bassett Rd.

viii) We ask that an independent assessment study be made on the viability of the Town's present sewage and wastewater infrastructure, and the impact on it of adding 50 dwellings, and what added investment is required to support the additional 50 dwellings proposed in this planning application.

ix) While the need for appropriate and sustainable housing is recognised, this proposal is unsuitable for a settlement of Northleach's size and infrastructure capacity. The development would place an unsustainable burden on essential local services and facilities, and would cause significant harm to the historic and natural environment, contrary to the principles of sustainable development set out in the National Planning Policy Framework (NPPF).

x) Insufficient Parking Provision, Congestion, and Road Safety concerns. Northleach already experiences significant parking pressure, particularly around the Market Square and High Street, where parking is frequently at capacity. The

narrow road layout and high volume of passing traffic have already resulted in increased incidents of vehicle damage, including wing mirrors being struck and cars being clipped by passing vehicles. Additional vehicles in the area will exacerbate congestion and increase the risk of further damage. This conflicts with NPPF guidance requiring developments to provide 'safe and suitable access for all users' and 'to avoid severe residual cumulative impacts on the road network'.

xi) Lack of Capacity at the Local GP Surgery. The Northleach GP surgery is already operating at or near capacity, with residents reporting difficulty securing timely appointments. An additional 100-200 residents would place further pressure on primary care services.

xii) Insufficient Secondary School Catchment Capacity.

xiii) Inadequate Sewage and Wastewater Infrastructure.

xiv) Harm to the Conservation Area and the Cotswolds AONB.

xv) Conflict with Sustainable Development Principles.

xvi) Lack of existing foul sewer capacity. I support development in general and it's not the developer's responsibility to rectify deficiencies in the existing network, however the Northleach Waste Water Treatment Works has not been adequately maintained and consequently is already overloaded and discharging raw sewage into the River Leach. I note that the application also proposes a temporary foul treatment plant in the event the permanent upgrades are not completed in time, which will discharge directly to the river. If it wasn't bad enough that the existing network pollutes the river, the application seeks to temporarily pollute the river until a connection is allowed to the permanent network to then also pollute the river. Who will operate and maintain this temporary treatment plant? If this application is approved without legally binding requirements setting out the operation, maintenance and monitoring of discharges in the public interest, it is allowing raw sewage discharges into the river in the same way that the permanent network is already doing. 50 new properties should not be allowed to temporarily bypass or permanently connect to the already overloaded and failing foul sewer network without upgrades, and even in that event there is no confidence whatsoever that the upgrades will be properly carried out and maintained by Thames Water, a company that is alleged to have criminally allowed the foul sewer network to lapse into a state of being unfit for purpose for existing connections, let alone new connections.

xvii) Northleach needs more 2 & 3 bedrooled family homes. The Town has an undersupply of these compared to the national average.

xviii) The dwellings Nos 4-11 in the Layout Plan are located too close to the East End roadway. This close proximity to the roadway creates a serious potential hazard for the eventual occupants of these properties.

xix) Construction of the waste water drainage pipeline, as presented in this planning application, would entail five of these trees (T3, T4, T5, T6, & T7) having their Root Protection Areas penetrated by the construction work. These 5 protected trees are 2 mature Beech trees and 3 Silver Birch trees.

xx) Thames Water states clearly that Northleach Sewage Works currently has no capacity to serve this development at all. It requested a planning condition preventing any homes from being occupied until upgrade works are completed, or until an infrastructure and phasing plan is agreed to prevent flooding and pollution incidents. The ability to connect these homes to the sewage works, and for the works to have the capacity to deal with them, is fundamental to this application. Yet the applicant has not clearly stated anywhere in the main documents that there is currently no capacity available.

xxi) There are already 40 new homes nearby connected to the same sewage works. The impact of a total of around 90 new homes on a works with no spare capacity has not been properly assessed. There is also no guarantee Thames Water will upgrade the works in a reasonable timeframe.

xxii) The proposed plan includes a row of terraced dwellings directly adjacent to the rear of our house and garden. No elevation plans have been included in the application to our knowledge, but based on the information given, it is assumed the terrace numbers 6-8 on the East End road will be 2 stories high. If this is the case, these will look straight into our garden and the rear of our house where our living space is. Due to the incline of the hill to the North, the site is already higher than where we are on the opposite side of the road. We request that house numbers 6-8 are 1 storey high, or else the plan is altered so that the dwellings sit further back from the road, to avoid the loss of privacy in our garden and rear of our property.

xxiii) Density of development.

xxiv) Impact on wildlife.

xxv) Landscape and visual impact.

xxvi) Over development- the site is too dense, mostly at the west side. The gardens for the small units are very small. No play space provided nor any within safe walking distance for children.

xxvii) Congestion at Nostle Road junction.

xxviii) I have significant concerns regarding the capacity of the local telephone exchange. It is my understanding from talking to Openreach engineers that the exchange is currently at absolute capacity, with engineers already forced to "piggyback" connections to maintain service.

xxix) There are currently 16 properties for sale (Rightmove) in Northleach covering a wide price range. We do not need 50 more properties built in Northleach. This number far exceeds what was originally planned.

xxx) The local businesses are excellent - but there is no bank, no supermarket, no dentist, no Community NHS facilities etc etc . Everyone has to travel to Cheltenham or Gloucester to access a wide range of facilities. More commuting in a car. More traffic on the roads.

xxxi) The Council's own adopted Local Plan allocates this site for 17 homes. This application is for 50. The applicant points to a future Local Plan, but that has not been adopted yet. Planning decisions must be made against the current plan. Under the current plan, 50 homes on this site has no policy basis.

xxxii) The Council's own 2021 site assessment, carried out by the Council's own officers, including a landscape specialist, concluded 17 homes after much detailed analysis. The reasons were specific: housing should not go beyond the boundary of the 40-home scheme already built to the south; the tree belt to the north should not be built on; and the landscape here is Medium to High sensitivity. The layout submitted with this application goes beyond all three of those limits. The same assessment also flagged that the eastern part of the site falls within the Cotswold Valleys Nature Improvement Area, and that the northern tree belt may deserve a Tree Preservation Order - its loss, the council said, 'would make the site less developable,' Neither issue has been properly addressed.

8.3 **Main grounds of support are:**

i) Within Settlement Boundary, allocated for residential, so principle of residential acceptable.

- ii) Affordable housing complies with Policy.
- iii) Key issue is the number of residential units, and whether they can be successfully integrated, into this part of the Natural Landscape.
- iv) Having a greater number of units, than intimated in the Local Plan, is in principle welcome, in the context of: Lack of 5 year old residential supply, contribution to the 33% undersupply, in the recent Issues and Options consultation, makes (the most) effective use of the land for residential, as required by December 2024 NPPF, does the same in relation to the consultation version of the 2025 NPPF, which also strongly encourages higher density.
- v) The layout indicates one way that 50 units could be provided, with a low impact on the Natural Landscape. In addition it provides considerable benefit by its contribution to residential need, and affordable housing. The density proposed is at a level that I have been supporting for other edge of Settlement sites.
- vi) As making effective use of the land is crucial in the CDC context, the December 2024 NPPF, and the consultation version of the 2025 NPPF, a condition should be added, that 50 units must be provided.
- vii) I am very much in favour of this development however it could allow for much needed traffic calming of traffic entering and leaving Northleach. This could be more easily achieved if the road entrance to the estate was from the East End road rather than from Nostle road estate. This would also allow for the fronts of new houses to face the road in the same manner they do in the more original parts of Northleach. With an extra road off the East End, this would mean that vehicles would be weary of other vehicles leaving and joining the East End and take more care with speed.

8.4 **General comments are:**

- i) Are Farmington Trust in breach of the "Permanent Endowment Status" of the Wills legacy. It is a matter of long standing understanding within the Northleach community that this land was endowed to the Trust under the specific conditions intended to ensure its preservation as a permanent asset.

8.5 **Cotswolds National Landscape Board**

8.5.1 'The above application which is located within the Cotswolds National Landscape has been brought to the attention of the Cotswolds National

Landscape Board ('the Board'). In reaching its planning decision, the local planning authority (LPA) has a duty to seek to further the statutory purpose of conserving and enhancing the natural beauty of the National Landscape.³ This duty should be explicitly addressed within the decision including an explanation of how the LPA considers the duty has been discharged.....

8.5.2 Due to the current development management consultation workload, the Board will not be providing a more comprehensive response on this occasion. This does not imply support for, or objection to, the proposed development'

8.6 Gloucestershire Constabulary - Designing Out Crime Officer

'Parking courts

8.6.1 The design shows parking courts used in different capacities across the site, a design feature which should be discouraged as they limit natural surveillance and can cause ASB, taking movement away from the primary routes and encouraging people to use their back garden gate.

8.6.2 Rather than design in features which are proven to cause of continual ASB and vehicle crime across the county, create more options where vehicles can be parked close to the home and been easily seen by their owners.

8.6.3 Rear courts are often under-utilised and are sometimes abused. They may form part of a scheme with various approaches to parking, but experience shows that heavy reliance on rear parking courts, without on-street controls to maximise their use, often leads to serious on-street problems. CIHT Residential Parking Design guidance note

8.6.4 To do this it would be advantageous to have a condition added to ensure every design stage includes open dialogue with the Constabulary's DOCO, 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*

8.6.5 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.'

9. Applicant's Supporting Information:

- Planning Statement
- Design and Access Statement
- Built Heritage Appraisal v. 2
- Transportation Statement
- Sustainability and Waste Management Statement
- Statement of Community Involvement
- Phase I Land Contamination Assessment
- Landscape and Visual Impact Assessment
- Geophysical Survey Report
- Flood Risk Assessment
- Ecological Impact Assessment (EcIA)
- Biodiversity Net Gain Statement
- Arboricultural Feasibility Assessment
- Arboricultural Impact Assessment
- Affordable Housing Statement
- Odour Constraints Assessment

- Archaeological Evaluation Assessment
- Archaeology - Final Report on an Evaluation at Land Parcel at Nostle Road

10. Officer's Assessment:

Proposed Development

- 10.1 This application is seeking Outline planning permission for '*50 dwellings, plus associated infrastructure and landscaping.*' 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 Notwithstanding the Outline nature of this application, the applicant has submitted an illustrative layout plan with this application which sets out how 50 dwellings and associated infrastructure could potentially be accommodated on the application site. The submitted plan shows a mix of detached, semi-detached and detached dwellings, with a terrace of housing addressing East End to the south. An area of landscaping/open space is proposed in the south-eastern corner of the application site, with terraces of housing fronting onto the aforementioned area. A strip of land would be retained in the northern corner of the site for landscaping and open space. A footpath link is also shown in the northern boundary of the application site. It would connect into a permissive footpath that extends through the field to the north of the site.
- 10.3 Vehicular access to the proposed development would be via a new entrance onto Nostle Road to the west of the application site. The proposed entrance would be located approximately 30m to the north of the junction of Nostle Road with East End.
- 10.4 Pedestrian access points are also proposed in the southern boundary of the site, which would connect onto an existing pedestrian footway lying along the northern side of East End.

(a) Residential Development in a Development Boundary

- 10.5 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 area which consists of the Cotswold District Local Plan 2011-2031 and the Northleach with Eastington Neighbourhood Plan 2018-2030

10.6 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 Summer 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.

10.7 The application site is located within Northleach Development Boundary. The following Local Plan policy is considered applicable to this proposal:

10.8 Policy DS2 Development Within Development Boundaries

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

10.9 In addition to the above, the application site is allocated for residential development in the Local Plan under Policy S12 - N_14B Land adjoining East End and Nostle Road (17 dwellings net).

10.10 It is considered that the introduction of residential development onto the site is acceptable in principle.

10.11 In addition, the draft NPPF states:

S4: Principle of development within settlements

'1. Development proposals within settlements 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.'

10.12 Notwithstanding the above, it is noted that the Council also has to have regard to policies in the existing National Planning Policy Framework (NPPF) and

guidance in the Planning Practice Guidance (PPG) when reaching a decision. The 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 DS2 is out-of-date at the present time and that paragraph 11 is engaged in such circumstances. Notwithstanding this, it is considered that a reasonable degree of weight can still be attributed to Policy DS2 at the current time as it is considered to accord with the aspirations of the NPPF, which seek to promote sustainable development in rural areas, support housing that reflects local needs and enhance or maintain the vitality of rural communities.
- 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 could 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.

Strategic Housing and Economic Land Availability Assessment (SHELAA)

- 10.16 With regard to the application site itself, it is noted that the current site has been assessed as part of the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA) process. The site is referenced as N14B Land adjoining East End and Nostle Road in the Strategic Housing and Economic Land Availability Assessment (2021), which states:

Summary

10.16.1 The site is already allocated for residential development in the Local Plan. There is an opportunity to improve the eastern gateway into Northleach with a limited amount of housing development on N14B. This

should not extend beyond the line of built form of the recently completed 40 dwelling development to the south. Any housing in this location will need to be sensitively designed and must respect and reflect the local character with a very high design standard required. It should create a soft edge to the settlement which improves the transition between the built up area and the surrounding countryside.

Recommendation

10.16.2 The site should continue to be allocated within the Local Plan. However, the site allocation policy should specify which parts of the site that should accommodate residential development and the parts of the site that should accommodate other elements of the development. Indicative capacity 17 homes (based on a density multiplier assumption of land within the west of the site, which: (i) would not extend housing beyond the line of developed form to the south of the site; and (ii) excludes land within the tree-belt to the north. A higher or lower amount of development may be appropriate when a detailed proposal is submitted). Proposed site design brief for Local Plan The following is not an exhaustive list and further guidance on design requirements will be provided through the pre-application process. Developments will be expected to comply with the requirements of the Cotswold Design Code and to deliver high quality built and green infrastructure design.

Indicative capacity

10.16.3 17 homes (based on a density multiplier assumption of land within the west of the site, which: (i) would not extend housing beyond the line of developed form to the south of the site; and (ii) excludes land within the tree-belt to the north. A higher or lower amount of development may be appropriate when a detailed proposal is submitted).

10.16.4 Should N14B be developed, the scheme should:

- improve the eastern gateway into Northleach through sensitive design and the development must respect and reflect the local character with a very high design standard;*
- create a soft edge to the settlement that improves the transition between the built-up area and the surrounding countryside;*
- not extend the line of houses beyond the line of built form of the recently completed 40 dwelling development to the south;*

- *include a large area of public open space on the part of the site which does not accommodate housing development, which should contribute towards the delivery of the Green Infrastructure ring around the town; include a footpath; SuDs; substantial areas of tree planting and other features to enhance biodiversity.*
- *retain and enhance the woodland belt along the northern boundary; and*
- *create a treed boundary along the eastern and southern boundaries to break up the development form, as well as trees throughout the development.*

Key actions required

- *Further assessment of whether the site is best and most versatile agricultural land;*
- *Preliminary Ecological Assessment, particularly to the potential for Sky Larks and of the woodland belt along the northern boundary;*
- *Archaeological survey;*
- *Landscape and visual impact assessment; and*
- *Appraisal of the local Green Infrastructure network and opportunities.*

10.17 It is evident that the SHELAA considers the site to be suitable for residential development subject to a number of recommendations being addressed. The need to create a soft edge to the settlement together with new landscaping and open space are noted. It is also noted that the SHELAA makes reference to built development not extending beyond the recently completed housing scheme to the south. However, Officers consider that a rigid adherence to this could result in a rather contrived and hard built edge to the settlement. It is considered that there is scope to develop a scheme that projects further eastwards than the development to the south, whilst still respecting the character and appearance of the area. Moreover, in light of the December 2024 changes to the NPPF, this Council now has to ensure that development schemes make an efficient use of land, whilst also ensuring that they respond in a sympathetic manner to their surroundings.

10.18 Paragraph 124 of the NPPF states that decisions *'should promote an effective use of land in meeting the need for homes and other uses, while safeguarding*

and improving the environment and ensuring safe and healthy living conditions.'

- 10.19 Paragraph 129 of the NPPF states that planning decisions should support development that makes efficient use of land, taking into account: the desirability of maintaining an area's prevailing character and setting (including residential gardens).

Accessibility to Services and Facilities and Size of Development Relative to Northleach

- 10.20 The application site lies adjacent to the town of Northleach, which is identified as a Principal Settlement in the Local Plan. The existing town contains a range of shops and services, as well as a primary school, church, fire station, medical practice, community centre and bus services. The town had a population of 1,946 in 2021 (Cotswold District Council Settlement Role and Function Study - November 2025).
- 10.21 With regard to the distance of the site from existing services and facilities, it is noted that 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 also 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. In addition, paragraph 110 of the NPPF 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.'* In the case of this proposal, the application site lies adjacent to a pedestrian footway which extends westwards towards the town centre. The distances of the proposed site entrance from the centre of the town and the primary school are approximately 700m and 900m respectively. In addition, the town's community and medical centres are located approximately 250-350m to the south of the application site. The site is therefore considered to be within reasonable walking distance of a number of the town's services and facilities.
- 10.22 The routes available from the site to the main services and facilities in the town include designated footways which are illuminated and which are not subject to significant inclines or declines. The routes for cyclists would also be along

East End and the High Street. Having regard to the proximity of the site to the centre of the town, the availability of services and facilities within the town and the nature of routes linking the site to such services and facilities, it is considered that the proposed development would provide future residents with reasonable access to a range of services and facilities by means other than the private motor car. It is therefore considered, in terms of accessibility, that the site represents a sustainable location for the level of development being proposed.

- 10.23 With regard to the delivery of 50 additional dwellings in the town, it is noted that the Council's 'Cotswold District Housing Land Supply Report - May 2025' states that 89 dwellings have been built in the town in the period dating from the 1st April 2011 to the 31st March 2024 and that there were no outstanding extant permissions at that time. The aforementioned figure is lower than other Principal Settlements such as Bourton-on-the-Water (431 completions), Stow-on-the-Wold (259 completions) or Upper Rissington (419 completions). Having regard to the size of the settlement as a whole and the amount of housing permitted in the current Local Plan period, it is considered that the erection of 50 additional dwellings would not represent a disproportionate increase in the size of the settlement or place unacceptable pressure on existing infrastructure. The proposal is therefore considered acceptable in this respect.
- 10.24 In addition to the above, it is also noted that this Council is currently in the process of producing a new Local Plan which would cover the period from 2025-2043. As part of this process, the Council issued a document titled 'Local Plan Review Preferred Options Consultation' in November 2025. The aforementioned document sought public feedback on 7 potential spatial strategies, each of which is aimed at addressing the Council's requirement to deliver 18,650 new dwellings in the new Local Plan period. Paragraph 2.15 of the Preferred Options Consultation states that '*the Council's preferred development is Scenario 5, as it builds on the current adopted strategy which has successfully delivered the development needs of the adopted Local Plan period until the introduction of the new housing target in December 2024.*' Scenario 5 could potentially deliver 14,660 homes which be more than the other scenarios. It would involve the allocation of sites in Principal Settlements, Non-Principal Settlements and Village Clusters and would support Rural Exception Sites in Rural Settlements and the creation of a new settlement(s) and/or strategic extensions to existing settlements. Northleach continues to be identified as a Principal Settlement in the emerging Local Plan.

(b) Housing Mix and Affordable Housing

10.25 The following Local Plan policies are considered applicable to this application:

10.26 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.'*

10.27 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.'*

10.28 With regard to housing mix, it is considered necessary to ensure that a mechanism is put in place to secure an appropriate mix of affordable and 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 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.

10.29 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. The latest Office for National Statistics (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. In order to ensure that an appropriate mix of open market housing is provided, it is considered that the matter is addressed by condition.

10.30 With regard to affordable housing, it is noted that the application site has an established agricultural use. As such, the application site would be subject to 40% affordable housing provision. The Council's Housing Officer has recommended the following housing mix:

Policy compliant scheme mix

	Social Rent	Affordable Rent	Shared Ownership and or First Homes
1 BF	4	-	-
2 BH	2	4	4
3 BH	-	2	2
4 BH	2	-	-
	8	6	6

10.31 It is noted that the Council's Homeseeker service advises that 31 households qualify for affordable housing in Northleach. The current proposal would therefore make a significant contribution towards this need. In addition the mix proposed by the Housing Officer would include 8 social rented units, which would also represent a significant benefit. Subject to the aforementioned level and mix (or similar) being secured through a S106 legal agreement, it is

considered that the proposal would accord with the requirements of Local Plan Policy H2.

10.32 With regard to self-build/custom build housing, a development of 50 dwellings would be required to provide 3 serviced plots. This would be covered through a S106 legal agreement.

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

10.33 The 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).

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

10.35 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.*

10.36 Local Plan Policy EN2 Design of the Built and Natural Environment states:

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.

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

1. *Development will be permitted where it does not have a significant detrimental impact on the natural and historic landscape (including the tranquillity of the countryside) of Cotswold District or neighbouring areas.*

2. *Proposals will take account of landscape and historic landscape character, visual quality and local distinctiveness. They will be expected to enhance, restore and better manage the natural and historic landscape, and any significant landscape features and elements, including key views, the setting of settlements, settlement patterns and heritage assets.*

10.38 Local Plan Policy EN5 Cotswolds Area of Outstanding Natural Beauty (AONB) states:

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.*

10.39 Local Plan Policy INF7: Green Infrastructure states:

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).*

10.40 Neighbourhood Plan Policy NE3: Design of the Built and Natural Environment states:

Proposals for new development, including extensions to existing buildings, should be of the highest design standards, in accordance with the relevant policies of the Cotswold Local Plan and the Cotswold Design Code. The proposals should have specific regard to:

i. maintaining key views, particularly to the Church of St Peter and St Paul, to the town centre along West End and East End and from within the Northleach Conservation Area to the surrounding countryside;

ii. reflecting the key local features and development guidelines described in the Northleach Design Statement (2016);

iii. retaining historic burgage plots intact or better revealing their historic significance;

iv. improving footpath links from the town to the countryside and within the town; and

v. contributing to the creation of a new green infrastructure ring around Northleach.

10.41 In terms of national guidance, 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 *'recognising the intrinsic character and beauty of the countryside'*.

10.42 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.'*

10.43 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)'

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

10.45 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.'

10.46 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.'*

10.47 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.'

10.48 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. '*

10.49 The application site and its surroundings are classified in the Cotswolds Conservation Board's Landscape Character Assessment (LCA) as falling within Landscape Character Area 9D Cotswolds High Wold Dip-Slope. This in turn falls within Landscape Character Type High Wold Dip-Slope.

10.50 The LCA identifies the *'Development, expansion and infilling of settlements, including residential, industrial and leisure within and onto the High Wold Dip-slope'* as a Local Force for Change.

10.51 The Potential landscape implications of new development can include:

- *Intrusion of expanded settlement fringes into the landscape.*
- *Degradation of views to, from and across the High Wold Dip-slope.*

- *Erosion of distinctive 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 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.*

10.52 The LCA's Landscape Strategies and Guidelines states:

- *Maintain the open, sparsely settled character of the High Wold Dipslope by limiting new development to existing settlements.*
- *Avoid development that will intrude negatively into the landscape and cannot be successfully mitigated, for example, extensions to settlements on visible hillsides.*
- *Ensure new development is proportionate and does not overwhelm the existing settlement.*
- *Ensure that new development does not adversely affect settlement character and form.*

- *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.*
- *Ensure new built development is visually integrated with the rural landscape setting and does not interrupt the setting of existing villages or views.*
- *Promote the use of local stone and building styles in the construction of new buildings and extensions to existing dwellings. (New buildings should, at least, respect local vernacular style).*
- *Adopt measures to minimise and where possible reduce light pollution.*
- *Retain existing trees, dry stone walls, hedges etc as part of the scheme.*
- *Ensure new development is 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.*
- *Ensure the density of new development reflects its location relative to the 'core' of the settlement and its proximity to the surrounding rural landscape.*
- *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.'*

10.53 With regard to the site itself, the SHELAA states:

'Landscape sensitivity

Evaluation: Medium to High/Medium

10.53.1 Justification: The parcel is susceptible to housing development by reason of its sloping character which exposes it to views from the east, its location in open countryside and by its association with the wider farmed landscape. Its location within the Cotswolds AONB is indicative of its landscape value. However, within the wider landscape the parcel is well screened except from the east and south-east, where it is seen against a backdrop of existing housing when approaching the settlement from the east. Housing development here would only be acceptable if it was carried out to a very high standard to create a more pleasing indented and varied edge to the settlement on this side. The treed boundary to the north should be retained and enhanced within any scheme. Development should not venture east beyond the settlement edge created to the south by the recently completed development. The east of the parcel could be utilised for community benefit and the enhancement of Green Infrastructure provision.

10.54 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. The Non-Technical Summary states:

'8.1.7 The LVIA has identified that there would be direct and adverse effects of a moderate level of significance upon the National Landscape, and Local Landscape Character of the Site during construction, reducing on completion to neutral in nature and therefore of Negligible impact and not significant. The new land uses are in character with adjacent land uses to the west, and south, and appropriate for an allocated edge of town location, and so on balance have a neutral nature of effect. In the long term, once new planting has matured the proposal has a beneficial effect on the National Landscape; Local Character of the Site; and Trees and Vegetation of a Minor or moderate impact.

8.1.8 The LVIA has also identified that there will be direct and adverse effects during construction, and on completion, which are of moderate levels of significance upon people's views from VP1 and VP2 East End. These arise as a result of proximity to the construction activity and built form, enclosing of the view and loss of far reaching views to tree lined skylines. 15 years after planting, with the maturing of the proposed vegetation the effects reduce to a neutral and so Negligible level of significance.

8.1.9 In conclusion, this edge of town site is already designated as an allocation in the Development Plan, has a very limited visual envelope; and new tree and shrub planting will integrate the development in its landscape context, and

bring beneficial long term impacts on the local landscape character, and the National Landscape.'

- 10.55 In response to the findings of the LVIA, it is agreed that the principal public views of the site are from Nostle Road to the west and from East End to the south and to the east. The latter location provides extensive views across the valley which defines the landscape to the east of the town. The closest Public Right of Way (KNE15) to the site extends diagonally across the field located to the south of the application site. There are no other Public Rights of Way within close proximity of the site. In addition to the aforementioned views, the site is also visible from the Eastington road, approximately 450-500m to the south of the application site. The aforementioned location affords views across the valley to the east of the settlement. Existing housing lying to the west and south of the application site can be seen from the Eastington road.
- 10.56 Due to the drop in land levels to the south of East End and the existence of a retaining drystone wall alongside the aforementioned highway, it is noted that shorter range views from Public Right of Way KNE15 to the south are also screened to a certain extent by the aforementioned wall and roadside vegetation.
- 10.57 It is noted that the proposed development would result in an encroachment of development into an attractive valley landscape located to the east of the town. However, the views of the site are relatively localised and, where available, place the site in context with existing residential and town development. Moreover, it is also noted that the site has been allocated for residential development in the Local Plan, which demonstrates that the site can accommodate residential development in principle, without causing an unacceptable level of harm to the character and appearance of this part of the CNL or the landscape and visual setting of the town.
- 10.58 It is acknowledged that the current proposal is for a higher number of dwellings than that referred to in Local Plan Policy S12 and the SHELAA. However, the aforementioned documents were published in 2018 and 2021 respectively, and at a time when the Council did not need to deliver the high number of dwellings that it does at the present time. Moreover, the 17 dwelling figure is also intended as a guide and is not a rigid, fixed amount. As set out previously in this report, there is now a greater need to secure the efficient use of land and to increase the Council's supply of housing. It is considered that the current proposal has the potential to create a form of development that would respond in a sympathetic manner to the historic settlement pattern of the town, whilst also providing sufficient space for green infrastructure and the creation of an

attractive entrance into the town. The illustrative layout incorporates a relatively linear layout, with lines of terraced dwellings and properties fronting onto open space. This is considered to be sympathetic to existing patterns of development within the settlement.

- 10.59 It is of note that the recently completed housing development of 40 dwellings lying to the south of the current application site is located on a smaller site than that now proposed. It also involved the re-development of a field, similar to this current application. It is considered that the development to the south of this site has created a more characterful entrance into the settlement than existed previously. The introduction of new development does not therefore automatically have to cause harm. The creation of a sympathetically designed scheme could also enhance the approach into the settlement and the relationship of the settlement with the National Landscape.
- 10.60 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 town of Northleach 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 would also ensure that development would respond sympathetically to its location. In this regard, it is considered that the proposal reasonably addresses the requirements set out in the aforementioned duty.
- 10.61 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 town 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.'*

- 10.62 The Cotswolds National Landscape Board has not raised an objection to the proposal.
- 10.63 It is considered that the proposed development could be undertaken in a manner that would not have an adverse impact on the character or appearance of the National Landscape or the rural character of the settlement. The proposal is considered to accord with Local Plan Policies EN1, EN4 and EN5, Section 15 of the NPPF and policies in the Cotswolds National Landscape Management Plan.

Major Development in the Cotswolds National Landscape

- 10.64 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.'*

- 10.65 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'.

- 10.66 For the purposes of 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.'
- 10.67 In the case of this proposal, it is noted that the application site is allocated for residential development in the Local Plan. Paragraph 10.5.2 of the Local Plan states that clause 2 of Policy EN5, which relates to major development, *'does not apply to development sites allocated by the Local Plan because the need for those developments and scope for them to be accommodated outside the AONB was assessed during plan preparation.'* Notwithstanding this, it is also noted that the Local Plan site allocation refers to a figure of 17 dwellings. Whilst the aforementioned figure is only a guide, it does indicate the level of housing that was considered as part of the site allocation process. In contrast, the current proposal seeks to erect 50 dwellings which is considered to constitute a material increase in the number of dwellings specified in the Local Plan. In light of this change, it is considered reasonable to review the major development issue.
- 10.68 With regard to the current scheme, the proposal is for 50 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, with residential development located to the west and south of the current application site. Furthermore, the landscape and visual impact of the proposal is considered to be localised. It is also noted that the development of 40 dwellings on a smaller site to the south of the application site was deemed not to constitute major development at the time of its submission in 2014 (14/04274/OUT). The current proposal would represent a lower density of development (approximately 18.5 dwellings per hectare compared to 19 dwellings per hectare) than the aforementioned development. When assessed against the requirements of Footnote 67 of the NPPF, it is considered that this proposal would not have a significant adverse impact on the purposes for which the area has been designated. The scheme is therefore considered not to constitute major development having regard to paragraph 190 of the NPPF.

(d) Access and Highway Safety

- 10.69 The proposed development would be served by a new vehicular entrance onto Nostle Road to the west of the application site. The aforementioned road is a residential estate road serving a post war housing development. The proposed

entrance would be located approximately 30m to the north of the junction of Nostle Road with East End, which acts the main road leading into and out of the eastern part of the settlement.

10.70 The following policy and guidance is considered applicable to this proposal:

10.71 Local Plan Policy INF4 Highway Safety states:

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.

10.72 In addition, 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.'

10.73 This application is accompanied by a Transportation Statement (TS), which assessed a number of matters including traffic generation, visibility, accessibility and highway safety.

10.74 With regard to traffic generation, the TS states:

10.74.1 This number of new dwellings is equal to 66% of the number of existing dwellings in the Nostle Road cul-de-sac. The existing dwellings generate twenty-four outbound movements: $(24/100) \times 66 = 16$.

10.74.2 This means that the total combined traffic volume (existing and newly generated) leaving Nostle Road between 0800 Hours and 0900 Hours would only be forty vehicles. This is only two vehicles every three minutes.'

10.75 With regard to the direction of travel of vehicles leaving the application site, the TS states:

10.75.1 'Of the sixteen vehicles, 24% or four vehicles, would turn left out on to East End. The other 76% of vehicles (twelve) would turn right towards the village centre. This is only one additional vehicle every five minutes turning right. Similar very low numbers of vehicles would then return to the application site during the late afternoon peak period.'

10.75.2 In conclusion, given the existing geometry of the Nostle Road /East End road junction, and its clean accident record, it is considered that there is no capacity issue. And there are no concerns in connection with the safe and free flow of traffic on the public highway.'

10.76 It is considered that the proposed development would not generate a significant additional level of traffic passing through the town centre.

10.77 With regard to access visibility, the proposed entrance onto Nostle Road can provide the requisite visibility of 43m. In addition, the aforementioned visibility requirements can be met in both directions at the junction of Nostle Road with East End. Notwithstanding this, it is note that the 30mph speed limit along East End increases to 60mph at a point approximately 60m to the east of the Nostle Road junction. The TS includes the results of a speed survey which was undertaken to the east of the aforementioned junction. The speed surveys recorded 85th percentile speeds of between 31.7mph and 43.4mph. Visibility along East End from Nostle Road is sufficient to provide the minimum visibility requirements for the respective speeds.

10.78 Safe pedestrian access can also be provided directly onto the existing pedestrian footway located on East End.

10.79 Gloucestershire County Council (GCC) Highways raises no objection to this application subject to conditions.

10.80 The comments of the Town Council regarding car parking are noted. It is also noted that the first part of Neighbourhood Plan Policy NE1 states:

'Policy NE1: Public Parking

10.80.1 An indicative location for the development of a public car park, with access to West End, is shown on the Policies Map. The parking area should be for a maximum of 30 cars with no provision for coaches and with no ancillary buildings.

10.80.2 The development will be brought forward only as part of a comprehensive parking strategy for the town which incorporates a restructuring of existing public parking spaces in Market Place to create a new public space. Other public realm enhancements may include relocation of the public toilet block and reconfiguration of the bus stop.'

10.81 The supporting text to Local Plan Policy S12 also refers to the '*reconfiguring and improving of the Market Place, facilitating increased car and coach parking...*'

10.82 The proposed car park referred to in Policy NE1 would be located on land approximately 400m to the west of the Market Place. However, there is no permission in place for the car park and no applications or enquiries have been submitted for such a development. A comprehensive parking strategy for the town has also not yet been developed.

10.83 The proposed development would be able to provide sufficient on-site parking for future residents, which would avoid the creation of on-street parking outside the application site. In addition, the site is within reasonable walking and cycling distance of the town centre, which would help to reduce the car dependent nature of the proposal and the number of vehicles generated by the proposed development parking in the centre. Whilst it is acknowledged that the current proposal would be likely to generate some vehicle trips to the centre, it is considered that these would be predominantly short stay trips associated with existing shops, rather than longer stay visits, such as those associated with employment. No detailed information relating to parking capacity, such as parking surveys, has been submitted by the Town Council or other parties to demonstrate the extent of existing capacity issues. A detailed contribution request has also not been received. In order for a contribution to be justified, it would be necessary for such a request to accord with Regulation 122 of the Community and Infrastructure Levy Regulations 2010. The aforementioned regulations require a contribution to be necessary to make the development

acceptable in planning terms, directly related to the proposed development and fairly and reasonably related in scale and kind to the development. In this instance, it is considered that such a request has not been fully justified and that the level and type of parking that would be generated by the proposed scheme would not be of nature that would cause significant highway issues in the Market Place, sufficient to justify a financial contribution.

- 10.84 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 in accordance with Local Plan Policy INF4 and guidance in Section 9 of the NPPF.

(e) Flooding and Drainage

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

- 10.86 This application is accompanied by a Flood Risk Assessment (FRA), which includes a proposed surface water drainage strategy for the site. It states:

10.86.1 Infiltration rates are known to vary across the site, being low to the north but much better to the south.

10.86.2 Where possible surface water will be dealt with at source, within the house plots where possible, using permeable pavements and soakaways. The precise areas where this can be achieved will be confirmed during design development following detailed site investigations and infiltration testing.

10.86.3 Plots without on site infiltration potential, along with shared and public paved areas will discharge surface water to an infiltration basin in the south-east of the site.'

&

10.86.4 'All surface water will be directed to the area of public open space to the southern east of the site. Landscape levels can be altered in this area to create a shallow attenuation basin to provide the requisite attenuation storage.

10.86.5 The water will then discharge to the River at the annual average peak greenfield rate, known as Q_{bar} .'

- 10.87 Surface water drainage calculations will include a 40% allowance for peak rainfall events that may occur as a result of climate change.
- 10.88 Gloucestershire County Council Lead Local Flood Authority (LLFA) has assessed this application in conjunction with its role as a statutory consultee for surface water drainage matters. It states:
- 10.88.1 'The drainage strategy proposes management of surface water by infiltration with an attenuated scheme discharging surface water to a local watercourse via a local Thames Water surface water sewer. This strategy is acceptable to the LLFA and the calculations and drawings offered in the FRA indicate that there is adequate space on the site to accommodate such a strategy.'*
- 10.88.2 'Given that this is only an outline application with scope for some amendment any permission granted against this application should be conditioned as follows to ensure that the detailed design conforms with the principles described in the agreed FRA.'*
- 10.89 It is considered that the proposed development can reasonably address the issue of surface water drainage in accordance with Local Plan Policy EN14.
- 10.90 With regard to foul drainage matters, the applicant is proposing to connect the development to a Thames Water sewage treatment works which is located approximately 230m to the south-east of the application site. The foul drainage would connect into a 150mm diameter public foul water sewer which is located near the junction of East End and Bassett Road to the south-west of the application site.
- 10.91 Concerns have been raised by a number of local residents about the capacity of the existing infrastructure and a resultant increase in the pollution of nearby watercourses.
- 10.92 The relevant body for dealing with foul water in the site area is Thames Water (TW). TW has raised no objection to this application on foul drainage grounds. Under the requirements of the Water Industry Act 1991, TW 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 TW.

10.93 This matter was covered in a recent planning appeal at Whitburn in South Tyneside (APP/A4520/W/25/3365110). Notwithstanding the fact that the relevant water company (Northumbrian Water) was being investigated by Ofwat for the unauthorised spilling of raw sewage, the Planning Inspector allowed the appeal and awarded full costs against the Council. In the planning appeal decision, the Inspector states:

'25. Although the Council considers that it cannot be assumed that the pollution control regime governing the handling of wastewater is operating effectively, this is a separate regime governed by separate legislation to bring in line failings of NW (and Ofwat). Based on the Ofwat notice, NW are implementing the necessary regimes to ensure pollution controls are operating effectively and outside the realms of planning decisions.

26. Notwithstanding this, even if Ofwat were not implementing the necessary regimes, this is still a separate regime and not subject to the focus of planning decisions, which are concerned with land use. If the Council's approach is correct, all housing development that would be served by NW would be unacceptable. This simply cannot be the case, especially when considering the severe housing shortage in the area. Furthermore, the investigation by OEP demonstrates that there are measures in place for when the separate regime may have its own failings.'

10.94 In the accompanying costs decision (APP/A4520/W/25/3365110), the Inspector states:

'5. The LPA's refusal relies on the proposal having an unacceptable effect on water quality from the waste water discharges from the site. This is because nearby waste water treatment works, under the operation of Northumbrian Water (NW), have been subject to investigation by Ofwat for unauthorised spilling of raw sewage. Ofwat have also been under investigation from the Office for Environmental Protection (OEP) for their failing to exercise its duty under environmental law to make enforcement orders.

6. For this reason, the LPA did not consider that the pollution control regime governing the handling of wastewater was operating effectively, as detailed by paragraph 201 of the National Planning Policy Framework (the Framework).

7. The Council's approach is fundamentally at odds with what the Framework is seeking to achieve. Paragraph 201 is there to ensure that developments such as this do not get unduly delayed by matters outside the control of the developer, and by matters unrelated to the land use proposed.'

10.95 In addition to the above, the matter of foul drainage capacity was also addressed by a Planning Inspector following a recent appeal Inquiry relating to the erection of 195 dwellings to the east of Cotswold Business Village in Moreton-in-Marsh (Appeal Ref: 6002934, CDC Ref 25/01036/OUT).

10.96 Paragraphs 13-16 of the aforementioned appeal decision state the following, with WWTW referring to Waste Water Treatment Works:

' 13. A response by Thames Water dated 12 February 2026¹³ shows that it is aware that the WWTW needs upgrading, has an understanding of what is required, and plans to undertake the works by 2030. It is unclear whether or not the works as currently planned would be sufficient to also be able to accommodate the extra demand/capacity requirements which would be generated by the proposal. However, under the Water Industry Act 1991 Thames Water has a legal duty to accept connections to the public sewers from new development, and to provide, maintain, and extend public sewer systems and sewage treatment works to ensure effective drainage. It must treat wastewater to meet strict environmental standards set by the Environment Agency (EA). The EA has confirmed that it has no objection to the proposal, subject to Thames Water providing a suitable increase in capacity at the treatment works. Thames Water do not object to the proposal.

14. The lack of objection from Thames Water and the EA is contingent on the upgrade works to the WWTW occurring. The detail of this is not yet known and nor is the precise link between the number of proposed dwellings that could be occupied and the works, subject to further detailed understanding of both the upgrade works and how they would link to capacity for new dwellings. However, this could be controlled by condition(s), both in-principle and in relation to occupation of proposed dwellings and phasing of the development.

15. Such condition(s) would be discharged by the Council, likely in consultation with the statutory undertaker, Thames Water, and the statutory consultee, the EA. This is not only the standard approach to discharging a condition, but also the appropriate approach to discharging a condition - it is necessary for the Council to be the body which discharges a condition, subject to consultation with other parties as required.

16. I see no reason why such condition(s) should not be relied upon to ensure that the WWTW are adequately upgraded to accommodate the proposed development. If they were with a trigger prior to occupation, then the condition(s) would ensure that there would be no harm with regard to this issue. The phased delivery of homes could be part of this consideration. There is also

no reason to believe that the relevant upgrades to the WWTW would not be forthcoming in a timely manner because of the legal duty that Thames Water is subject to. In addition, the WWTW is next to the appeal site so physical connection to it should pose no technical difficulties. '

10.97 With regard to the current application, TW raises no objection in relation to foul drainage capacity. It has, however, requested a condition to ensure that upgrades are made to the water supply network to ensure that future occupants are provided with an adequate water supply. In light of the response from TW and the outcome of the above appeal decisions, it is considered that the development can be undertaken in a manner that would not have an unacceptable impact in relation to foul drainage and water supply.

10.98 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.'

(f) Impact on Residential Amenity

10.99 The final design, layout, size and orientation of dwellings would be addressed at the Reserved Matters stage should this application be granted Outline permission. Notwithstanding this, and having regard to the illustrative layout submitted by the applicant, it is considered that the site could reasonably accommodate the level of proposed development without having an unacceptable impact on residential amenity, taking into account guidance in the Cotswold Design Code. The site is considered to be of sufficient size to provide adequate garden space, separation distances between dwellings and to prevent unacceptable levels of privacy, loss of light or overbearing impact. The concerns of local residents about the proximity of new dwellings to existing properties lying to the west of the application site are noted. However, this is a matter that would ultimately be addressed at the Reserved Matters stage.

10.100 It is considered that the site is of sufficient size to accommodate the proposed level of development and incorporate a reasonable level of Public Open Space, including the provision of a Local Area of Play or a Local Equipped Area of Play.

10.101 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.'*

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

(g) Biodiversity

10.103 The following Local Plan policy is applicable to this proposal:

10.104 Local Plan 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.

10.105 This application is accompanied by an Ecological Impact Assessment (EcIA). The EcIA states:

10.105.1 'The Site is dominated by modified grassland habitat of low ecological value, with higher value habitats restricted to the Site boundaries and including stands of tall forbs, semi-improved grassland in field margins, mixed scrub, introduced shrubs, and a native hedgerow containing trees. Along the northern edge of the Site is an area of more complex habitat, comprising mixed scrub, trees, and rough grassland.'

10.105.2 The habitats around the margins of the Site have the potential to support foraging and commuting bats. There are no features suitable for roosting bats on Site however there are several mature trees to the north of the Site with potential to support roosting bats. Habitats within and adjacent to the Site also have suitability to support badgers, though no badger setts were recorded during the survey. Additionally, these habitats are likely to support common and widespread species of bird, and common and widespread invertebrate species. There is a small amount of suitable habitat for reptiles on Site.'

10.105.3 The proposed development will result in the loss of low value modified grassland and tall forb habitats, and small amounts of other neutral grassland. A biodiversity net gain assessment has been carried out to inform appropriate compensation measures for the Site and is reported separately. Without appropriate control measures during construction, the proposed development has the potential to impacts some habitats of higher ecological value, including the hedgerow and adjacent areas of scrub and trees.'

10.105.4 The development has the potential to cause disturbance to bat roosts if works encroach upon the area of habitat within the north of the Site. If works are required within this area, it is recommended that trees with potential to support roosting bats are subject to climbed inspection by a licensed ecologist.'

10.106 The Council's Biodiversity Officer has reviewed the EcIA and advises:

'Although no protected species were identified on-site, the EcIA identified habitats suitable to support common reptile species, nesting birds, badger, hedgehog, brown hare, and roosting bats (off-site trees adjacent to the site). Therefore, precautionary mitigation measures should be secured through a construction ecological management plan (CEMP) condition once all other biodiversity issues are resolved.'

10.107 It is considered that the proposed development can be undertaken in a manner that would not have an adverse impact on protected species or their habitat, and which can also introduce ecological improvements in accordance with Local Plan Policy EN8.

10.108 With regard to Biodiversity Net Gain (BNG), the Biodiversity Officer considers that additional information is still required in order that the minimum 10% enhancement can be demonstrated. At the time of writing this report, discussions are ongoing between the Biodiversity Officer and the applicant. An update will be provided to Committee on the 8th July.

Other Matters

10.109 The Council's Tree Officer advises:

10.109.1 'The site is not presently affected by a TPO or in a conservation area. The proposed access and current proposed site layout will result in all trees and hedgerows on site being retained (with adequate space for protection measures). A final layout that retains and adequately protects all existing trees and hedgerows is supported.'

10.109.2 New tree planting is proposed. This is supported and should not diminish as layout plans and landscaping are finalised. New tree planting should be a mix of native and where suitable, ornamental species. In line with local plan policies and the NPPF, new tree planting should include street tree planting and in areas of the site that allow it, trees that will ultimately reach a large size.'

10.109.3 Detailed arboricultural information and tree planting plans should be submitted at reserved matters stages and once proposed site layout plans have been finalised. This information should be fully compliant with BS5837 and prepared by a suitably competent arboricultural practitioner such as an arboricultural consultant.'

10.110 It is considered that the proposed development can be undertaken in a manner that would accord with Local Plan Policy EN7.

10.111 With regard to archaeology, GCC Archaeology advises:

10.111.1 'The county Historic Environment Record shows that there are no designated heritage assets within the proposed development site but remains dating to the Romano-British and medieval periods have been recorded to the south of the site. As part of pre-application discussion with our department, desk based assessment, geophysical survey and trial trench evaluation have been carried out within the site (the latter two reports have been submitted with the application). The results of the archaeological investigations within the site indicate that no archaeological remains of interest will be impacted by the proposals.'

10.111.2 On the basis of the above, I recommend that no further archaeological investigation or mitigation is necessary in relation to this application.'

10.112 With regard to climate change and energy efficiency, this application is accompanied by a Sustainability and Waste Management Statement. The aforementioned report includes the following:

- *proposed development aims to reduce total carbon emissions by 35-50% compared to building regulations.*
- *Targeting reduced energy consumption through improved U-values, airtightness, and low-energy lighting.*
- *Implementing a site waste management plan and resource efficiency benchmarks.*
- *Adhering to best practice policies for air, water, and ground pollution, and registering for the Considerate Constructors Scheme.*
- *Achieving a water consumption target of 110 litres/person/day with low water-consuming fittings.*
- *Promoting sustainable transport options, including access to public transport and provisions for cycle storage and car parking.*
- *Ensuring high build quality beyond minimum Building Regulations standards and using responsibly sourced materials.*

10.113 The use of air source heat pumps is also proposed. The final details relating to such matters would be addressed at the Reserved Matters stage. However, it is considered that the proposed development could be undertaken in a manner that would help to mitigate the impact of climate change.

10.114 With regard to financial contributions, GCC Community and Infrastructure has requested contributions of £63,918 to secondary (16-18) education and £9,800 to library services. A contribution towards primary education is not sought. GCC also requests financial contributions of £28,100 to bus stop infrastructure; £28,500 to a travel plan and £20,580 Home to school transport. 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, directly related to the proposed development and 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.

10.115 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 The proposed scheme seeks to introduce new residential development onto a site located within Northleach Development Boundary and which is allocated for residential development in the Local Plan. In addition, the Council cannot currently demonstrate a robust 5 year supply of housing land. Paragraph 11 d of the NPPF is therefore applicable to this application. In the case of paragraph 11 d i, it is considered that the proposed development could be undertaken in a manner that would not cause harm to the character or appearance of the Cotswolds National Landscape. As such, the impact of the proposal on the aforementioned protected area does not provide a strong ground to refuse the application in this instance. In the case of paragraph 11 dii, it is considered that the benefits arising from the delivery of new housing, including affordable housing, weigh heavily in favour of the proposed scheme. Subject to no objection being raised by the Biodiversity Officer, it is considered that the adverse impacts of the proposal do not significantly and demonstrably outweigh the benefits. It is therefore recommended that this application is granted permission subject to the recommendation set out above.

12. Proposed Conditions:

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

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

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

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

3. The development shall not be started before approval of the details relating to Appearance, Layout, 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 drawings: 1660 01 D, 1660 17 C, HDS/25/06/02/01, 932 LD-100 B, 25190/01 P1.

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

5. 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 in accordance with Local Plan Policy EN15.

6. 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) Methods of demolition within the root protection area (RPA as defined in BS5837:2012) of retained trees.
- d) Details of construction within the RPA or that may impact on the retained trees.
- e) 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 no dig specification. Details shall include relevant sections through them.
- f) 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.
- g) A specification for protective fencing to safeguard trees during both demolition and construction phases and a plan indicating the alignment of the protective fencing.
- h) Tree protection during construction indicated on the TPP with construction activities clearly identified as prohibited in this area.
- i) 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.

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 & EN7 and pursuant of section 197 of the Town and Country Planning Act 1990.

7. Prior to the commencement of development, a surface water drainage scheme shall be submitted to and approved in writing by the Local Planning Authority. The surface water drainage scheme shall accord with the principles set out in the drainage strategy section of the document titled 'Flood Risk Assessment Feb 2026 Issue:1' and include a timetable for the implementation of all drainage works.

Before the above details are submitted an assessment shall be carried out of the potential for disposing of surface water by means of a sustainable drainage system in accordance with the principles set out in The SuDS Manual, CIRIA C753 (or any subsequent version), and the results of the assessment shall be included in the surface water drainage scheme. Where a sustainable drainage scheme is to be provided, the submitted details shall:

- i. provide information about the design storm period and intensity, the method employed to delay and control the surface water discharged from the site and the measures taken to prevent pollution of the receiving groundwater and/or surface waters;
- ii. include a timetable for its implementation; and
- iii. Provide a full risk assessment for flooding during the groundworks and building phases with mitigation measures specified for identified flood risks; and
- iv. provide a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime.

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

8. No dwelling hereby permitted shall be occupied until confirmation has been provided to, and agreed in writing by the Local Planning Authority, 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 in accordance with Local Plan Policy INF8.

9. The development hereby approved shall not be occupied until the means of access for vehicles, pedestrians and cyclists have been constructed and completed as shown on drawing HDS/25/06/02/01 (Vehicular Visibility Splays and Junction Details).

Reason: In the interest of highway safety in accordance with Local Plan Policy INF4.

10. The development hereby approved shall not be occupied until visibility splays are provided from a point 0.6m above carriageway level at the centre of the vehicular access to the application site and 2.4 metres back from the near side edge of the adjoining carriageway, (measured perpendicularly), for a distance of 43 metres in each direction measured along the nearside edge of the adjoining carriageway and offset a distance of 0.6 metres from the edge of the carriageway. These splays shall thereafter be permanently kept free of all obstructions to visibility over 0.6m in height above carriageway level.

Reason: In the interests of highway safety in accordance with Local Plan Policy INF4.

11. An application for Reserved Matters shall include details of vehicular and cycle parking for each dwelling, with such facilities being provided for each dwelling prior to its first occupation.

Reason: To promote sustainable travel and healthy communities in accordance with Local Plan Policies INF3 and INF5.

12. Prior to the first occupation of the development hereby permitted, a Travel Plan and associated Welcome Pack, promoting sustainable forms of access to the development, shall be submitted to and approved in writing by the Local Planning Authority, and the Welcome Pack shall be provided for each property prior to its first occupation.

Reason: In order to promote sustainable modes of transport in accordance with Local Plan Policy INF3.

13. 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 approved plan shall be adhered to throughout the construction period. 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.

Reason: In the interests of safe operation of the adopted highway in the lead into development and the construction phase of the development 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 could have implications for highway safety.

14. 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 20% 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.

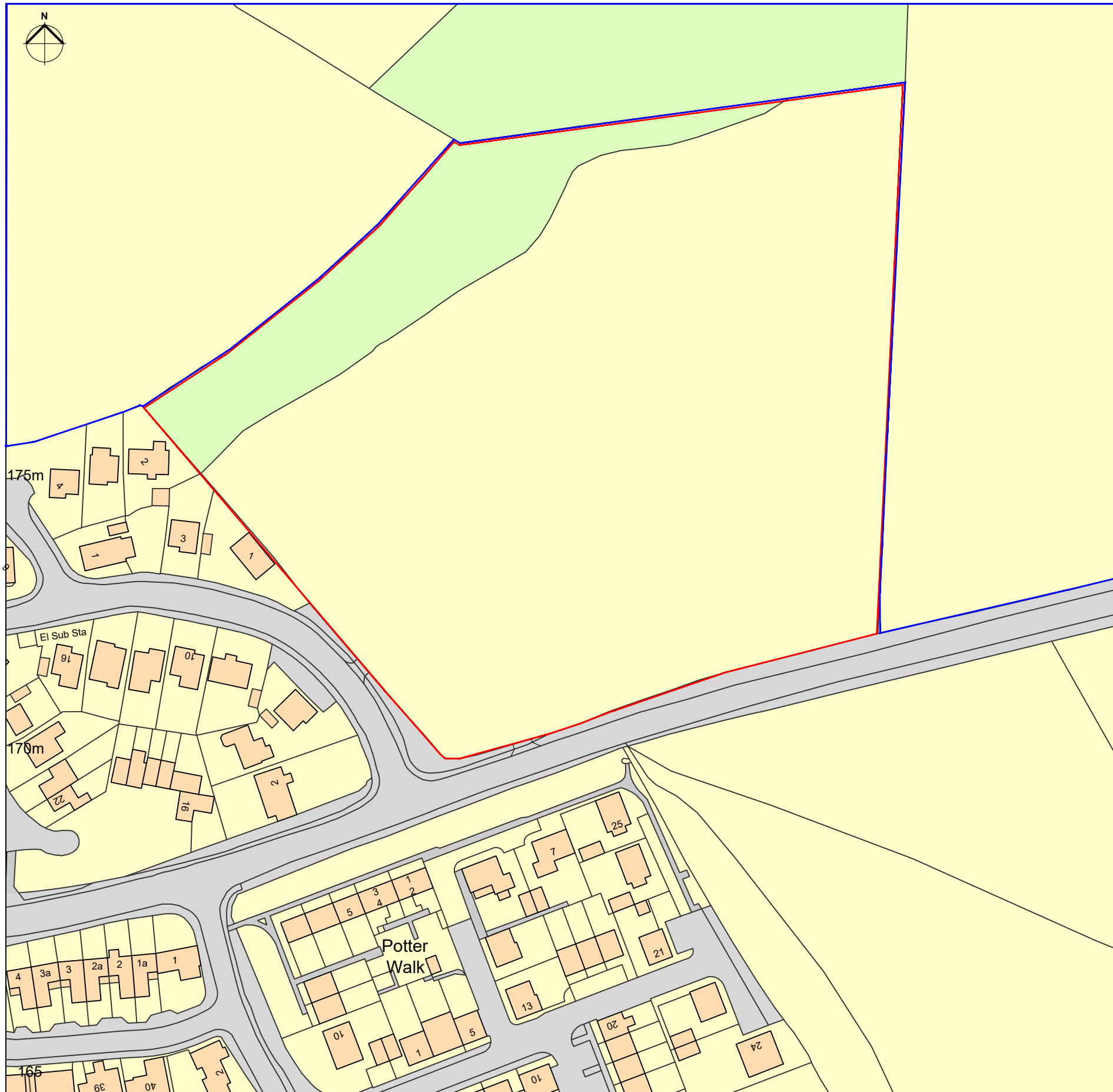
Reason: In order to ensure that the development contains an appropriate mix of dwellings in accordance with the requirements of Local Plan Policy H1.

15. An application for Reserved Matters shall include 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.

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.

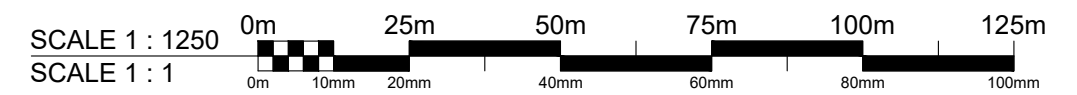
Reason: To ensure that future residents will have access to areas of open space and recreation and to ensure that such areas are provided and maintained to a satisfactory standard for the longer term in accordance with Local Plan Policies INF2 and EN2.

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REVISION	DATE	DRAWN	CHECKED	DESCRIPTION	SCALE	DATE
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					MH	MH
					JOB NUMBER	DRAWING NO.
					1660	01
						D

Spirit Architecture
 Creating Inspiring Design & Sustainable Architecture
 4 Haycroft Road, Sherborne, Cheltenham, Gloucestershire, GL54 3DY

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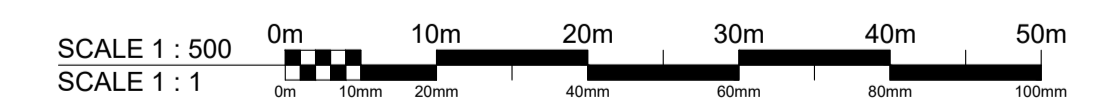
Tel: 01451 839003 E: enquiries@spiritarchitecture.co.uk

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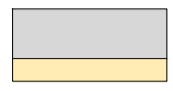



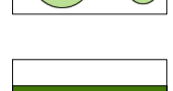





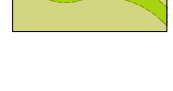



REVISION	DATE	DRAWN	CHECKED	DESCRIPTION	SCALE	DATE
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				PROJECT	Lands Adjoining East Road and Nostle Road	
				DRAWN	MMH	
				CHECKED	MMH	
				DRAWING TITLE	1660	17
				NO. NUMBER		C
				REVISION		

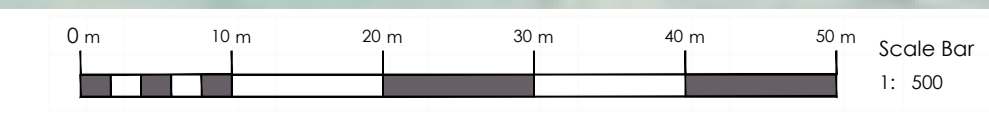
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 Tel: 01451 839003 E: enquiries@spiritarchitecture.co.uk

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- KEY**
-  SITE BOUNDARY
 -  PROPOSED HOUSING & AREA WITHIN PLOTS
 -  PROPOSED ROADS & FOOTPATHS
 -  EXISTING TREES & VEGETATION RETAINED
 -  EXISTING GRASSLAND RETAINED
 -  EXISTING COTSWOLD STONE BOUNDARY WALLS TO BE RETAINED AND REPAIRED
 -  PROPOSED TREES AND SHRUBS
 -  PROPOSED HEDGEROW
 -  PROPOSED SHRUB/GROUNDCOVER MIX
 -  PROPOSED GRASS
 -  PROPOSED WILDFLOWER MIX
 -  PROPOSED HOUSE GARDENS
 -  PROPOSED WET MEADOW MIX - AREA OCCASIONALLY WET TO ASSIST OVERALL SITE DRAINAGE
 -  PROPOSED MOWN PATHS WITHIN WILDFLOWER MIX

NATURALISTIC AREAS OF PLAY TO BE INCORPORATED AS REQUIRED



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B		02/02/26	(MS) REVISED FOLLOWING CLIENT COMMENTS
REV: A	Date: 26/01/26	Date: (MS) REVISED FOLLOWING ARCHITECTURAL UPDATES	
			
The Old Dairy Tatworth Cheltenham Gloucestershire GL54 3JG Tel: 01285 721072			
client: Farmington Trust Ltd			
project: Northleach			
title: Indicative Landscape Masterplan			
scale: 1:500	date: 06/11/25	drawn by: AVS	checked by: PD
project ref: 932	sheet no: LD-100	sheet B	

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Construction of 10no. dwellings at Land to the West of Fosseway Farm Stow Road Moreton-In-Marsh Gloucestershire

Full Application 25/02443/FUL	
Applicant:	Aspects Building Services Ltd
Agent:	Planning And Design Group (UK) Ltd
Case Officer:	Rebecca McAndrew
Ward Member(s):	Councillor Daryl Corps
Committee Date:	8 July 2026
RECOMMENDATION:	<p>PERMIT subject to the completion of a S.106 agreement securing:</p> <p>i. Travel plan and the offsite highways work monitoring</p>

1. Main Issues:

- (a) Principle of Development
- (b) Impact on the Cotswolds National Landscape
- (c) Design
- (d) Impact on Residential Amenity
- (e) Highways Safety
- (f) Biodiversity and Geodiversity
- (g) Trees, Landscaping and Green Infrastructure
- (h) Drainage and Flood Risk
- (i) Land contamination
- (j) Public Rights of Way / Accessibility
- (k) Planning Obligations / Infrastructure (S106/CIL)

2. Reasons for Referral:

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

3. Site Description:

- 3.1 The application site comprises approximately 0.79 hectares of land (circa 0.97ha including access) located to the west of Stow Road (A429) on the edge of

Moreton-in-Marsh. The site lies immediately adjacent to, but outside, the defined settlement boundary and is currently undeveloped.

- 3.2 The site is bordered by a recently constructed nursing home and Aldi supermarket to the east, with access proposed via this existing highway network. To the north are recreational uses including a multi-sports facility and croquet/bowls club, beyond which are residential properties. To the south and west the site adjoins agricultural land and open countryside.
- 3.3 The site lies within the Cotswolds National Landscape (AONB) and is relatively flat, enclosed by established hedgerows and tree boundaries, with some trees along the northern boundary subject to Tree Preservation Orders. Public Footpath HMM7 (part of the Monarch's Way) runs along the western boundary, providing pedestrian connectivity to the town and surrounding countryside.
- 3.4 The site is located within Flood Zone 1 and benefits from proximity to local services and public transport links, with bus stops within walking distance along Stow Road.

4. Relevant Planning History:

None.

5. Planning Policies:

- DS1 Development Strategy
- DS2 Dev within Development Boundaries
- DS3 Small-scale Res Dev non-Principal Settle
- DS4 Open Market Housing o/s Principal/non-Pr
- EN1 Built, Natural & Historic Environment
- EN2 Design of Built & Natural Environment
- EN5 Cotswolds AONB
- EN4 The Wider Natural & Historic Landscape
- EN10 HE: Designated Heritage Assets
- INF4 Highway Safety
- INF5 Parking Provision
- EN6 Special Landscape Areas
- EN7 Trees, Hedgerows & Woodlands
- EN14 Managing Flood Risk
- EN15 Pollution & Contaminated Land
- INF7 Green Infrastructure

6. Observations of Consultees:

6.1 Biodiversity Officer:

6.1.1 The Council's Biodiversity Officer raises no objection to the proposed development, subject to conditions. A series of ecological conditions are recommended, including the submission of a Construction Environmental Management Plan (Biodiversity) and a 30-year Landscape and Ecological Management Plan (LEMP) to secure the long-term establishment, management and monitoring of habitats. Conditions are also recommended to secure on-site biodiversity enhancements, including integrated bird and bat features, habitat protection during construction, and a lighting strategy to avoid impacts on nocturnal species.

6.1.2 In respect of biodiversity net gain (BNG), the Officer notes that the scheme would rely in part on off-site units and that the submitted metric should be updated to reflect a realistic target condition for on-site habitats. Subject to these amendments and the discharge of the statutory biodiversity gain condition, the proposals are considered capable of delivering the required net gain.

6.1.3 The Officer also confirms that appropriate mitigation has been secured in respect of Great Crested Newts through the District Licensing Scheme, addressing previous concerns.

6.2 Tree Officer:

No objection. Protected trees along the northern boundary have been correctly identified and will be retained. Subject to adherence to the submitted tree protection plan and implementation of the proposed landscaping and planting scheme, the development is acceptable. Conditions are recommended to secure tree protection and replacement planting.

6.3 Environmental Health Contamination:

6.3.1 No objection. The submitted Phase 1 Desk Study (Oct 2025) identifies potential onsite and offsite contamination risks, including infilled ground, historic agricultural use, a former campsite, and a nearby petrol filling station. A Phase 2 intrusive investigation (soil and gas testing) is required, which is supported.

6.3.2 Conditions are recommended to secure site investigation, any necessary remediation, and verification of works to ensure the site is suitable for its proposed use.

6.4 Thames Water:

6.4.1 Thames Water raises no objection in principle but has been unable to confirm foul water capacity and therefore recommends conditions to secure capacity, phasing, or necessary network upgrades prior to occupation. Upgrades to sewage treatment works may also be required.

6.4.2 The site lies within an area affected by groundwater infiltration; while the development is not expected to significantly impact the network, careful design is required to prevent flooding.

6.4.3 No objection is raised to surface water proposals subject to a sequential approach and agreement with the LLFA. No objection is raised in respect of water supply capacity, subject to standard informatives.

6.5 Landscape:

6.5.1 The Landscape Officer raises no objection to the proposal. The site is recognised as forming part of the Cotswold National Landscape and its development would result in the loss of a small area of pastoral land and a localised extension of the settlement edge. This would lead to a noticeable, but limited, change in landscape character.

6.5.2 However, the site is considered to be relatively well contained by existing development, including the adjacent supermarket, care home and hospital, meaning that effects on the wider landscape are limited. The most sensitive views are from Public Right of Way HMM7, where the development would be visible; however, impacts are not considered significant and would reduce over time as landscaping becomes established.

6.5.3 The submitted landscape strategy is generally supported, including the retention of hedgerows and provision of new planting, although some refinements are recommended. These include strengthening boundary planting, adopting a softer treatment to the PROW connection, and exploring more landscape-led sustainable drainage solutions. The Officer also highlights the importance of controlling external lighting to protect dark skies.

6.5.4 Overall, subject to these measures, the Landscape Officer concludes that the proposal would result in localised and acceptable landscape and visual effects and would comply with relevant Local Plan policies.

6.6 GCC Lead Local Flood Authority:

No objection. The revised drainage strategy, using permeable paving for attenuation, is considered more robust and will not increase flood risk. Supporting SuDS maintenance and exceedance details are acceptable. Sufficient information has been provided and no drainage conditions are required.

6.7 GCC Highways:

No objection. The development will have minimal traffic impact and no highway safety concerns. Conditions cover parking, access, construction management and a Travel Plan, with legal agreements required for monitoring and highway works.

6.8 GCC Community Infrastructure Planning:

The County Council advises that planning obligations (S106) may be required to mitigate infrastructure impacts and should be secured prior to approval.

6.9 GCC PROW:

6.9.1 No objection in principle, subject to safeguards. The proposal makes positive use of Public Footpath HMM7 as a pedestrian connection; however, clarification is required regarding the proposed cycle link, as the route is legally restricted to pedestrian use unless formally upgraded.

6.9.2 The public right of way must remain unobstructed and unaffected during and after construction, with any temporary or permanent changes requiring appropriate legal consent (e.g. diversion or closure orders).

6.10 GCC Minerals & Waste Planning Authority:

6.10.1 No objection in principle. The submission demonstrates partial consideration of waste minimisation, but further details are required for both construction and occupation phases. Conditions are recommended to secure a Site Waste Management Plan and provision for recycling facilities.

6.10.2 No safeguarding issues are identified for waste or mineral infrastructure.

6.10.3 No financial contributions are currently sought for education or libraries, as sufficient capacity exists. However, the Council emphasises the need to address infrastructure requirements through S106, including monitoring fees, to ensure the development remains acceptable.

6.11 Archaeology:

The site is within an archaeologically sensitive area, but previous geophysical survey and trench evaluation found no significant remains. The risk of impact is low, and no further archaeological work is required.

7. View of Town/Parish Council:

7.1 Objection raised. Concerns include reliance on a Public Right of Way for cycle access, suitability of the site (as previously identified in the SHELAA), ecology and flood risk constraints, and unresolved issues relating to highways, sewage infrastructure, and amenity impacts. The application is considered premature, and clearer on-site Biodiversity Net Gain provision is requested.

8. Other Representations:

8.1 15 third party representations and one petition (containing approximately 70-75 signatories) have been received, objecting to the application on the grounds of:

- The principle of development, with the site located outside the defined settlement boundary and within the Cotswolds National Landscape
- Encroachment into the countryside and harm to the rural character and landscape setting
- Highway safety concerns, including congestion and access issues, particularly at the A429 / Aldi junction
- Existing parking pressures, particularly in relation to Esmere Gardens Care Home
- Impact on residential amenity, including overlooking, noise, disturbance and loss of tranquillity
- Impact on vulnerable and elderly residents of the adjoining care home
- Pressure on local infrastructure, including healthcare facilities and local services
- Loss of green space, biodiversity and wildlife habitat

- Concerns regarding the scale, layout and density of the development

9. Applicant's Supporting Information:

- 9.1 The application is supported by a Planning Statement, Design and Access Statement, Transport Statement, Flood Risk Assessment, Ecological Appraisal, Arboricultural reports, landscaping details, and contamination information.

10 Officer's Assessment:

Background and Proposed Development

- 10.1 The application site is located on land to the west of Fossey Farm, Stow Road, Moreton in Marsh. The site extends to approximately 0.8 hectares (circa 1.96 acres) and comprises an area of grassland and scrub, which has been partly cleared following recent development to the east. The site lies on the western edge of the settlement, with residential development and a retail unit to the north, Esmere Gardens Care Home to the east, and open agricultural land to the south and west.
- 10.2 Full planning permission is sought for the construction of 10 no. dwellings. The proposed development comprises 10 single-storey, 3-bedroom bungalows, with associated access, parking, landscaping and infrastructure works.
- 10.3 The layout proposes a low-density form of development arranged within the site, with vehicular access taken from the existing access serving adjacent development. Each dwelling is provided with private amenity space and parking provision.
- 10.4 The application is supported by a Planning Statement, Design and Access Statement, Transport Statement, Flood Risk Assessment, Ecological Appraisal and Financial Viability Assessment, together with other supporting technical information.
- 10.5 The site lies outside the defined settlement boundary for Moreton in Marsh and within the Cotswolds National Landscape.

(a) Principle of Development

- 10.6 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires 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."

- 10.7 The starting point for determining this application is the adopted Cotswold District Local Plan 2011-2031 (LP).
- 10.8 Section 70(2) of the Town and Country Planning Act 1990 (as amended) requires the Local Planning Authority to have regard to any local finance considerations, so far as material to the application.
- 10.9 The policies and guidance within the National Planning Policy Framework (NPPF) are also a material consideration.
- 10.10 The application site lies outside the defined development boundary of Moreton-in-Marsh, which is identified as a Principal Settlement under Policy DS1 of the LP. As such, whilst the settlement itself represents a sustainable location for growth, the site falls within the open countryside for the purposes of the development plan.
- 10.11 In these circumstances, Policy DS4 is engaged, which seeks to restrict new open market housing outside development boundaries unless specific exceptions apply. The proposal does not fall within any of the defined exception categories set out within the reasoned justification for Policy DS4. Therefore, in policy terms, the scheme is contrary to this provision when read in isolation.
- 10.12 However, the development plan must be read as a whole. Policy DS1 sets out an overarching strategy which supports sustainable development, and this aligns with Paragraph 11 of the National Planning Policy Framework (NPPF), which establishes a presumption in favour of sustainable development. This requires decision-makers to approve proposals that accord with the development plan, or where policies are out-of-date, to grant permission unless adverse impacts would significantly and demonstrably outweigh the benefits.
- 10.13 Furthermore, Paragraph 83 of the NPPF recognises that housing in rural areas should be located where it can enhance or maintain the vitality of rural communities. In this case, the site is immediately adjacent to the built-up area of Moreton-in-Marsh and benefits from good access to services and facilities. As such, it cannot reasonably be described as having an isolated or unsustainable in location.
- 10.14 Accordingly, whilst the proposal conflicts with Policy DS4 in principle, this conflict is limited by the site's close relationship with a Principal Settlement and

its sustainable location. The acceptability of the development therefore turns on its compliance with other relevant policies of the development plan, together with the overall planning balance, having regard to the benefits of the scheme and the provisions of the NPPF.

(b) Impact on the Cotswolds National Landscape (Area of Outstanding Natural Beauty)

- 10.15 The application site is located within the Cotswolds National Landscape (Area of Outstanding Natural Beauty). Section 85(A1) of the Countryside and Rights of Way Act 2000 (as amended by the Levelling-up and Regeneration Act 2023) places a statutory duty on decision-makers to seek to further the purpose of conserving and enhancing the natural beauty of National Landscapes.
- 10.16 This statutory duty is reflected in Policy EN5 of the Cotswold District Local Plan and Paragraph 189 of the National Planning Policy Framework (NPPF), both of which require that great weight is given to conserving and enhancing landscape and scenic beauty in such designated areas.
- 10.17 Policy EN5 and Paragraph 190 of the NPPF also set out that major development within National Landscapes should be refused other than in exceptional circumstances and where it can be demonstrated to be in the public interest. However, Footnote 67 of the NPPF confirms that whether a proposal constitutes "major development" in this context is a matter for the decision-maker, having regard to the nature, scale and setting of the proposal, and whether it would be likely to have significant adverse effects on the purposes of the designation.
- 10.18 While the proposal comprises 10 dwellings and therefore constitutes 'major development' for the purposes of the Town and Country Planning (General Permitted Development) Order, it is not considered to represent major development within the meaning of the NPPF. Having regard to its modest scale, its position immediately adjacent to the built-up edge of Moreton-in-Marsh, and its limited extent, the proposal would not give rise to significant adverse effects on the overall character or special qualities of the National Landscape.
- 10.19 Notwithstanding this, the proposal has been designed with full regard to its sensitive landscape context. It would extend development beyond the existing settlement edge onto currently undeveloped land and therefore results in a degree of encroachment into the countryside. However, the site is closely related to existing built form and does not form part of a wider open or prominent landscape.

- 10.20 The key consideration is therefore whether the proposed scale, layout and landscaping would conserve and enhance the character and appearance of the National Landscape. In this regard, the low-density form of development, the use of appropriate materials, and the incorporation of landscaping, open space and boundary treatments would assist in assimilating the scheme into its surroundings and softening its visual impact.
- 10.21 Overall, whilst the proposal results in a localised change to the settlement edge, it would conserve the wider landscape character and scenic beauty of the National Landscape. Any limited harm arising would be contained and should be weighed in the planning balance alongside the benefits of the scheme.

(c) Design & Layout

- 10.22 Policy EN2 requires development to achieve a high standard of design that respects the character and distinctive appearance of the locality. This is reinforced by Chapter 11 of the NPPF, which places significant weight on the creation of well-designed, beautiful and sustainable places. The NPPF expects development to be visually attractive, sympathetic to local character and history, and to establish a strong sense of place through high-quality architecture, layout and materials.
- 10.23 In addition, the Cotswold Design Code provides locally specific guidance on achieving high-quality design that responds to the defining characteristics of the area. It emphasises the importance of reinforcing local identity through the use of traditional materials, simple building forms, and high-quality detailing that reflects the Cotswold vernacular.
- 10.24 The proposal comprises a low-level development of detached bungalows arranged in a low-density layout, with associated parking and landscaping. The scale, form and grain of development respond positively to the site's edge-of-settlement location, providing a soft and appropriate transition between the built-up area of Moreton-in-Marsh and the open countryside. Whilst third parties have raised converse concerns regarding both overdevelopment and inefficient use of land density, the proposed layout reflects the prevailing pattern of development at the settlement edge and accords with both the NPPF and the Cotswold Design Code, which support context-led approaches to density.
- 10.25 The dwellings themselves have been designed to reflect the principles of well-designed homes, incorporating architectural detailing characteristic of the local area. In accordance with the Cotswold Design Code, the scheme proposes the

use of stone as the primary facing material, together with traditional detailing including chimneys and stone heads and cills to window and door openings. This approach would reinforce local distinctiveness and would ensure that the development integrates successfully with the established built character of the area.

- 10.26 The layout ensures appropriate separation distances would be secured between proposed dwellings and neighbouring uses, including the adjacent care home. Boundary treatments, along with a strong landscaping framework, would soften the development, enhance biodiversity and assist in assimilating the scheme into its wider landscape setting.
- 10.27 Overall, the proposed development would balance the efficient use of land with high-quality, locally distinctive design which would sit comfortably within the local context. On this basis, the proposal meets the requirements of Policy EN2 and the Cotswold Design Code and the provisions of the NPPF.

(d) Residential Amenity

- 10.28 LP Policy EN2 requires development to be of a high standard of design which respects the character and distinctive appearance of the locality and accords with the Cotswold Design Code (Appendix D). The Design Code further requires development to secure a high standard of residential amenity, including appropriate levels of privacy, outlook, daylight and sunlight, and the provision of usable external space for both existing and future occupants.
- 10.29 This is consistent with paragraph 135(f) of the NPPF, which seeks to ensure that developments create places with a high standard of amenity for existing and future users.
- 10.30 A key consideration in this case is the relationship between the proposed development and the adjacent Esmere Gardens Care Home. Three bungalows would back onto the care home site.
- 10.31 Third-party representations raise significant concerns regarding potential overlooking, noise, disturbance and loss of tranquillity. The existing site currently provides an undeveloped buffer between the care home and open countryside. As such, it is acknowledged that the introduction of residential development would alter this relationship and result in increased activity both during construction and operation. A degree of change is inevitable where development occurs adjacent to existing uses. However, the key issue is whether

the level of impact would be so significant as to result in undue harm to residential amenity.

- 10.32 The relationship between the proposed bungalows and the neighbouring care home would be acceptable. The dwellings would be sited and orientated to secure adequate levels of daylight for both future occupiers and existing residents of the care home. The submitted plans indicate that a separation distance of approximately 16 metres would be retained between a habitable room window serving one of the proposed bungalows and a stairwell window within the care home, increasing to around 18 metres in relation to a dining room window. Whilst these distances fall below the typically applied 22 metre guide, the potential for overlooking would be limited by the single-storey form of the proposed dwellings and the provision of 1.8 metre high boundary treatment. In addition, the layout would avoid direct overlooking of primary habitable room windows, with views largely confined to secondary or circulation spaces.
- 10.33 It is also considered that noise generated from additional vehicle movements and general residential activity would not be so significant, given the scale of the development, as to result in material disturbance to care home residents. Furthermore, having regard to the separation distances between the proposed dwellings and the care home, it is unlikely that any external lighting associated with the development would give rise to harmful light pollution.
- 10.34 The proposed development would also secure a satisfactory standard of residential amenity for future occupants. Suitable window-to-window separation distances would ensure adequate levels of privacy, outlook and natural light, whilst each dwelling would be served by a private garden of an appropriate size, providing sufficient outdoor amenity space.
- 10.35 Overall, the proposal would not result in material harm to the living conditions of neighbouring occupiers and would secure an adequate standard of amenity for future residents. The development would therefore be acceptable in amenity terms, having regard to Policy EN2, the Cotswold Design Code (Appendix D) and the provisions of the NPPF.

(e) Highway Safety

- 10.36 LP Policy INF4 requires development to provide safe and suitable access for all users and to ensure that it does not compromise highway safety or the efficient operation of the transport network.

- 10.37 This is supported by paragraphs 115 and 116 of the NPPF, which requires that development should only be prevented or refused on highways grounds where there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Paragraph 117 further emphasises that opportunities to promote sustainable transport modes should be considered.
- 10.38 The proposal would provide two parking spaces per dwelling and would utilise an existing access arrangement serving the adjacent Aldi store and care home, connecting onto the A429 (Stow Road). Concerns have been raised through third-party representations regarding existing congestion, difficulties in accessing the junction and the safety of additional traffic movements, particularly at peak times. Issues relating to parking pressure and interactions with vulnerable users of the adjacent care home have also been highlighted.
- 10.39 However, the Highway Authority has assessed the proposal and raises no objection, concluding that the scale of development would generate a limited number of additional vehicle movements that would not result in a severe impact on the operation of the local highway network. The access arrangements are considered capable of accommodating the proposed development in a safe and suitable manner, subject to appropriate conditions.
- 10.40 Whilst the concerns raised by local residents are acknowledged and reflect existing conditions on the local highway network, significant weight must be afforded to the views of the Highway Authority. In the absence of evidence demonstrating that the residual impacts would be severe, the proposal complies with Policy INF4 and the provisions of the NPPF.

(f) Biodiversity and Geodiversity

- 10.41 LP Policy EN8 seeks to conserve and enhance biodiversity and geodiversity. It supports development which delivers net gains where possible, resists proposals that would result in habitat fragmentation or harm to protected species and irreplaceable habitats and requires adequate mitigation or compensation where impacts cannot be avoided.
- 10.42 This approach is reflected in Chapter 15 of the NPPF, which seek to ensure that development minimises impacts on biodiversity, avoids significant harm and secures measurable net gains. Paragraph 187 places particular emphasis on the protection and enhancement of valued habitats and species, including the delivery of biodiversity net gain.

- 10.43 The application site comprises undeveloped land that contributes to local ecological value, particularly in relation to grassland and boundary vegetation. Third-party representations raise concerns regarding the loss of habitats for birds, insects and other wildlife. However, the submitted Ecological Appraisal identifies that, whilst there will be some loss of habitat, the impacts can be mitigated through appropriate measures, including the retention of existing vegetation where possible and the provision of new planting and biodiversity enhancements.
- 10.44 No objection has been raised by the Council's Biodiversity Officer, subject to conditions. These include the submission of a Construction Environmental Management Plan (Biodiversity), a 30-year Landscape and Ecological Management Plan (LEMP), the provision of on-site biodiversity enhancements (including integrated bird and bat features), and a sensitive lighting strategy to protect nocturnal species. The Officer also advises that the biodiversity metric should be updated to reflect a realistic target condition for onsite habitats and confirms that biodiversity net gain can be achieved through a combination of on-site measures and off-site units. Appropriate mitigation for Great Crested Newts has also been secured.
- 10.45 The biodiversity net gain requirement would be secured through a Biodiversity Gain Plan to be submitted and approved prior to commencement of development.
- 10.46 In conclusion, subject to the recommended conditions and the implementation of appropriate mitigation and enhancement measures, the proposal is considered capable of complying with Policy EN8 and the relevant provisions of the NPPF.

(g) Trees, Landscaping & Green Infrastructure

- 10.47 LP Policy EN7 seeks to ensure the protection and retention of trees, woodland and hedgerows, recognising their contribution to the character and appearance of the area, as well as their ecological value. Development proposals should incorporate appropriate landscaping and retain important features wherever possible.
- 10.48 This approach is supported by paragraph 136 of NPPF, which emphasises the importance of trees and green infrastructure in enhancing the environment, contributing to biodiversity, and improving the quality of development.

- 10.49 The application is accompanied by an Arboricultural Impact Assessment and landscaping proposals identifying existing trees, including those subject to Tree Preservation Orders along the site boundaries. The proposals seek to retain these features and incorporate new planting within the development, thereby reinforcing the site's boundaries and providing a degree of visual containment.
- 10.50 The Council's Tree Officer raises no objection subject to conditions securing tree protection measures during construction and the implementation of the proposed landscaping scheme. The retention of existing trees, together with the additional planting, will be important in integrating the development into its surroundings, softening the visual impact of the built form and maintaining a transition between the settlement and the adjacent countryside.
- 10.51 Subject to compliance with the recommended conditions, the proposal is considered to accord with Policy EN7 and the relevant provisions of the NPPF.

(h) Drainage and Flood Risk

- 10.52 LP Policy EN14 requires that development is appropriately located having regard to flood risk and incorporates sustainable drainage systems to manage surface water. Development should not increase flood risk elsewhere and must ensure that surface water is appropriately managed.
- 10.53 This approach is supported by paragraphs 173 and 174 of the NPPF, which seek to ensure that development is directed to areas of lowest flood risk and is safe for its lifetime without increasing flood risk elsewhere. Paragraph 181 requires that major developments incorporate sustainable drainage systems (SuDS), unless there is clear evidence that this would be inappropriate.
- 10.54 The application site lies within Flood Zone 1 and is therefore at low risk of flooding, making it sequentially preferable for residential development. The application site is located within a Flood Zone 1, which is the lowest designation of Flood Zone and one in which new residential development can be acceptable in principle. A Flood Risk Assessment and surface water drainage strategy have been submitted in support of the application, which proposes the use of sustainable drainage measures, including permeable paving and controlled discharge.
- 10.55 The Lead Local Flood Authority raises no objection to the revised drainage strategy, acknowledging that the proposed approach is robust and would not result in an increased risk of flooding either on-site or elsewhere.

- 10.56 Foul drainage is proposed to connect to the public sewer network. Whilst Thames Water has raised no objection to the scale of development in network terms, it has identified potential constraints at the receiving sewage treatment works and therefore recommends a condition to secure any necessary capacity upgrades or phasing prior to occupation.
- 10.57 Overall, the site is sequentially appropriate for development, and, subject to the imposition of conditions securing detailed drainage design and any necessary infrastructure upgrades, the proposal would not increase flood risk on-site or elsewhere. The scheme is therefore considered to comply with the relevant provisions of the NPPF and Local Plan policies relating to flood risk and drainage.

(h) Land Contamination

- 10.58 Local Plan Policy EN15 requires that land is suitable for its proposed use, with all potential contamination risks properly investigated, assessed and mitigated. Development proposals must clearly demonstrate that any contamination can be remediated and managed without giving rise to unacceptable risks to human health, property or the wider environment.
- 10.59 This is supported by paragraph 196 of the NPPF, which requires that planning decisions ensure a site is suitable for its proposed use, taking account of ground conditions and any risks arising from contamination or instability. Where necessary, remediation and mitigation measures should be secured to ensure safe development.
- 10.60 The application is supported by a Phase 1 Geo Environmental Desk Study, which identifies potential contamination risks associated with historic land uses, including agricultural activity and possible made ground. The report recommends that further intrusive site investigation is required to fully assess any contamination present.
- 10.61 The Council's Environmental Health Officer raises no objection to the proposal subject to the imposition of conditions requiring the submission of a Phase 2 site investigation, together with any necessary remediation strategy and verification report. These measures will ensure that any contamination risks are appropriately identified and addressed prior to development.
- 10.62 Subject to the recommended conditions, the development would ensure that the site is suitable for its intended residential use and would therefore comply with Policy EN15 and the provisions of the NPPF.

(h) Accessibility and Connectivity

- 10.63 LP Policy INF4 requires development to provide safe and suitable access for all users and to support sustainable transport and connectivity. This is reinforced by Chapter 9 of the NPPF, which seeks to secure safe, inclusive environments and maximise opportunities for walking and cycling.
- 10.64 The site is sustainably located within walking distance (less than 10 minutes) of Moreton-in-Marsh town centre and a range of local facilities, including a medical centre, food store and other services. It is also well served by public transport, with bus stops on Stow Road providing connections to the town centre and railway station.
- 10.65 The proposed development would provide a new access road incorporating a pedestrian footway linking to the existing public footpath network, ensuring appropriate pedestrian connectivity. Cycle parking would be provided within the curtilage of each dwelling.
- 10.66 Public Footpath HM/7/1 crosses the site and forms part of a wider network, including the Monarch's Way. The scheme retains and integrates this route, maintaining existing connections. No objection is raised by the County Council Public Rights of Way Officer, subject to this route remaining unobstructed and any alterations being subject to separate legal procedures. While a cycle link from this public right of way was originally considered, this would not been taken forward as the route is restricted to pedestrian use.
- 10.67 In view of the above, the proposal is considered to provide safe and suitable access and accords with Policy INF4 and the provisions of the NPPF.

(k) Planning Obligations

- 10.68 Paragraphs 56 and 58 of the NPPF require that planning obligations are only secured where they are necessary to make the development acceptable, directly related to the development, and fairly and reasonably related in scale and kind. There will also need to be a S106 Agreement to secure the monitoring fee for the Travel Plan and the offsite works.
- 10.69 In respect of infrastructure provision, the County Council has confirmed that no financial contributions are required in relation to education or library services, due to sufficient existing capacity. The development will, however, be liable for Community Infrastructure Levy (CIL), which will contribute towards wider infrastructure provision across the district

- 10.70 LP Policy H2 requires the provision of affordable housing on residential developments of 11 or more dwellings. Within designated rural areas, such as the National Landscape, a lower threshold of 6 or more dwellings applies, reflecting the need to support the delivery of affordable housing in smaller rural communities.
- 10.71 In respect of affordable housing provision, the applicant has submitted a Financial Viability Assessment (FVA). This concluded that the scheme would generate a marginal deficit and would therefore be unable to viably support any affordable housing provision. This assessment has been independently reviewed on behalf of the Local Planning Authority and it was found that the policy-compliant scenario would result in a substantial deficit and, even in the absence of any affordable housing provision, the scheme remains unviable once all development costs, including CIL, are taken into account. On this basis, the findings of the FVA have been accepted.
- 10.72 In view of this, no on-site provision or financial contributions towards affordable housing are sought.

Other Matters

- 10.73 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.

Human Rights and Equality

- 10.74 In making this recommendation, the Local Planning Authority has had regard to the Human Rights Act 1998 and considers that the proposal is compatible with the Convention rights. The decision is proportionate and in the public interest.
- 10.75 The Local Planning Authority has also had regard to its duties under the Equality Act 2010. No adverse impacts on persons with protected characteristics have been identified.

11. Conclusion:

- 11.1 The proposal is considered to comply with Local Plan Policies and the provisions of the NPPF. Therefore, subject to conditions and a S106 agreement to secure the monitoring fee for the Travel Plan and the offsite works, it is recommended for permission.

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): .

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, a sample panel of stonework of at least 1m² shall be erected on site for inspection and approved in writing by the Local Planning Authority. The panel shall demonstrate the proposed stone type, coursing, bonding, mortar mix and pointing. The development shall thereafter be carried out in accordance with the approved panel.

Reason: To ensure a high-quality finish appropriate to the locality.

4. Windows and doors shall be recessed a minimum of 75mm within the wall face and retained as such thereafter.

Reason: In the interests of visual amenity and local distinctiveness.

5. All planting comprised in the approved landscaping scheme shall be carried out in the first planting season following the occupation of any building or the completion of the development, whichever is the sooner. Any planting which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species. If any trees or hedgerows fail more than once they shall continue to be replaced on an annual basis until the end of the 5 year period.

Reason: To ensure adequate provision for trees/hedgerows, in the interests of visual amenity and the character and appearance of the area.

6. The erection of fencing for the protection of any retained tree shall be undertaken in accordance with the approved details specified in Weddles Tree Protection Plan drawing no 1335-005, Jul 25 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. 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.

Reason: To ensure adequate protection measures for existing trees/hedgerows to be retained, in accordance with Cotswold District Local Plan Policy EN7.

7. No development shall commence (including demolition, ground works and vegetation clearance) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be carried out in full accordance with the approved details.

The CEMP shall include, but not be limited to:

a) Construction management measures

- Construction traffic management (including parking, loading/unloading, routing and wheel washing)
- Hours of construction and deliveries
- Measures to control noise, dust and general disturbance

b) Biodiversity protection measures:

- Risk assessment of potentially damaging construction activities
- Identification of biodiversity protection zones
- Measures to safeguard habitats including ditches, hedgerows and trees
- Practical measures and sensitive working methods to avoid or reduce impacts (including method statements)
- Timing of works and restrictions to avoid harm to biodiversity
- Ecological supervision (including timing and role of an Ecological Clerk of Works, where required)
- Protective fencing, exclusion zones and site signage

- Details of excavations and measures to prevent harm to wildlife (e.g. ramping or covering)
- Monitoring and compliance checks during construction

The approved CEMP shall be adhered to throughout the construction period.

Reason: To safeguard highway safety, residential amenity and biodiversity during construction, in accordance with Policies INF4, EN2 and EN8 of the Cotswold District Local Plan, the Conservation of Habitats and Species Regulations 2017 (as amended), and the National Planning Policy Framework.

8. A 30-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 limited to, the following information:

1. Description and evaluation of features to be managed, including locations shown on a site map;
2. Establishment details, including preparation of the land;
3. Landscape and ecological trends and constraints on site that might influence management;
4. Aims and objectives of management linked to the Gloucestershire Local Nature Recovery Strategy;
5. Appropriate management options for achieving the aims and objectives;
6. Prescriptions for all management actions;
7. A work schedule matrix (i.e. an annual work plan) capable of being rolled forward over 5 or 10 year periods;
8. Details of the body or organisation responsible for the implementation of the plan;
9. 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
10. 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 ensure the development delivers a biodiversity net gain on site 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.

9. Before the erection of any external walls, details of the provision of integrated bird nesting features, integrated bat roosting features (e.g. bat boxes/tubes/bricks on south or south-east facing elevations), hedgehog holes and invertebrate hotels shall be submitted to the Local Planning Authority for approval. The details shall include a drawing showing the types of features, their locations within the site and their positions on the elevations of the dwellings, and a timetable for their provision. The approved details shall be implemented before the dwellings hereby approved are first occupied and thereafter permanently retained.

Reason: To secure 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.

10. No external lighting shall be installed until a site-wide lighting strategy has been submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be carried out in accordance with the approved details.

The strategy shall include:

- a) Identification of areas and features on site that are sensitive to nocturnal wildlife;
- b) Details of all external lighting, including location, height, design, intensity and direction (supported by contour plans and technical specifications), demonstrating that lighting will not adversely affect biodiversity or wildlife movement;
- c) Measures to minimise light spill and protect residential amenity and dark skies.

All external lighting shall be installed and retained in accordance with the approved strategy.

Reason: To protect the living conditions of neighbouring occupiers, biodiversity and dark skies, in accordance with Policies EN2 and EN8 of the Cotswold District Local Plan, the Conservation of Habitats and Species Regulations 2017 (as amended), and the National Planning Policy Framework.

11. 1. 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.

2. 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 Cotswold District Council Local Planning Policy EN15 and Section 15 of the NPPF.

12. If contamination is found during development, works shall cease until a remediation scheme has been submitted and approved.

Reason: To address unforeseen contamination.

13. No development shall be occupied until confirmation has been provided that either:

1. Foul water Capacity exists off site to serve the development, or
2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. 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, or
3. All Foul water network upgrades required to accommodate the additional flows from the development have been completed.

Reason: Network reinforcement works may be required to accommodate the proposed development.

14. No dwelling shall be occupied until the access has been constructed in accordance with the approved details.

Reason: In the interests of highway safety

15. Each dwelling shall not be occupied until its parking and cycle parking provision has been completed in accordance with the approved plans and shall thereafter be retained. The car parking spaces shall be hard surfaced and positively drained to a suitable outfall to ensure no surface water runs onto the highway and once occupied shall be maintained as such thereafter.

Reason: To ensure adequate parking provision

16. Before any part of the development hereby approved is brought into beneficial use and irrespective of any document currently submitted a Travel Plan will be submitted to and approved by the LPA which will include a monitoring methodology which is will include a survey methodology for assessing the travel mode choices of residents, an initial series of targets for modal shifts for residents and a secondary series of measures should the initial targets not be achieved. These secondary targets could include contributions to improving infrastructure to support sustainable travel modes as well as or instead of other measures to drive change. The Travel Plan once approved will be monitored and managed including an agreed surveying system to identify travel choices of (residents/customers and staff), changes in those travel choices and submission of annual reports from the Travel Plan Co-ordinator to the Local Authority for at least five years from the occupation of the final part of the development or until the targets in the Travel Plan are met.

Reason: To encourage sustainable transport.

17. Public Footpath HMM7 shall be retained on its existing alignment and kept open and unobstructed at all times during construction and following completion of the development.

Reason: To ensure the protection and continued use of the public right of way

18. No development shall commence until a Site Waste Management Plan has been submitted to and approved.

Reason: To minimise construction waste.

19. Prior to occupation, details of refuse and recycling storage facilities shall be submitted to and approved, and implemented prior to occupation.

Reason: To ensure adequate waste provision.

20. The development shall be undertaken in accordance with the recommendations contained within sections 5.1.1, 5.1.3, 5.1.5, 5.1.6 and 5.1.9 of the Preliminary Ecological Appraisal Rev D (Weddles, 17th February 2026). 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.

Informatives:

1. 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 be advised to 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.

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

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

If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/buildingwater.

3. The Lead Local Flood Authority (LLFA) offer the following advice:
 1. The LLFA will consider how the proposed sustainable drainage system can incorporate measures to help protect water quality, however pollution control is the responsibility of the Environment Agency
 2. Any revised documentation will only be considered by the LLFA when resubmitted through suds@gloucestershire.gov.uk e-mail address. Please quote the planning application number in the subject field.
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.

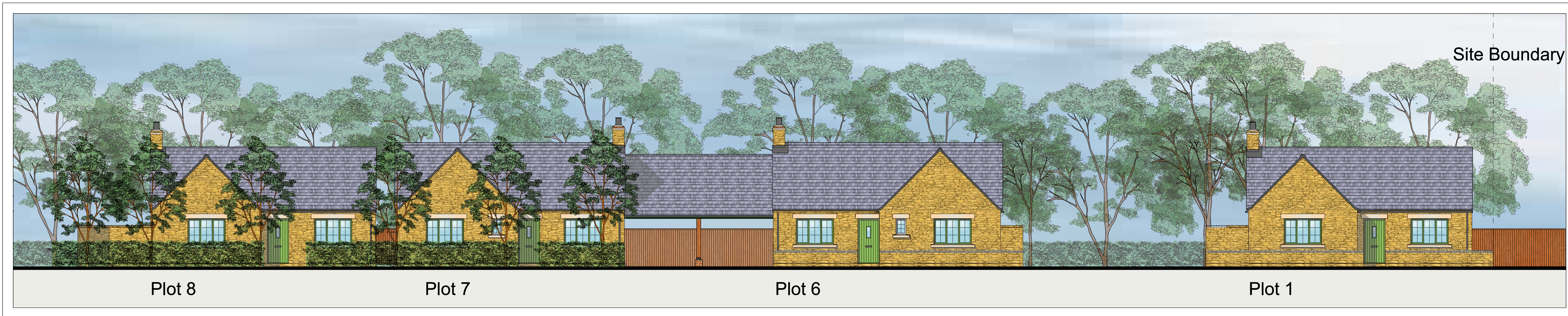
The planning authority, for the purposes of determining whether to approve a Biodiversity Gain Plan if one is required in respect of this permission would be Cotswold District Council. There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not 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>

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/>

The Gloucestershire Local Nature Recovery Strategy (LNRS) has been published by Gloucestershire County Council. This strategy must be used to inform the Strategic Significance Multiplier in the Statutory Biodiversity Metric or the Small Sites Metric, depending on which version has been submitted. As part of your discharge of condition application the biodiversity metric will need to be updated to refer to the published LNRS. Please speak to your project ecologist for further advice or alternatively, you can engage with the Council's pre-application advice service: Get advice on your planning application - Cotswold District Council

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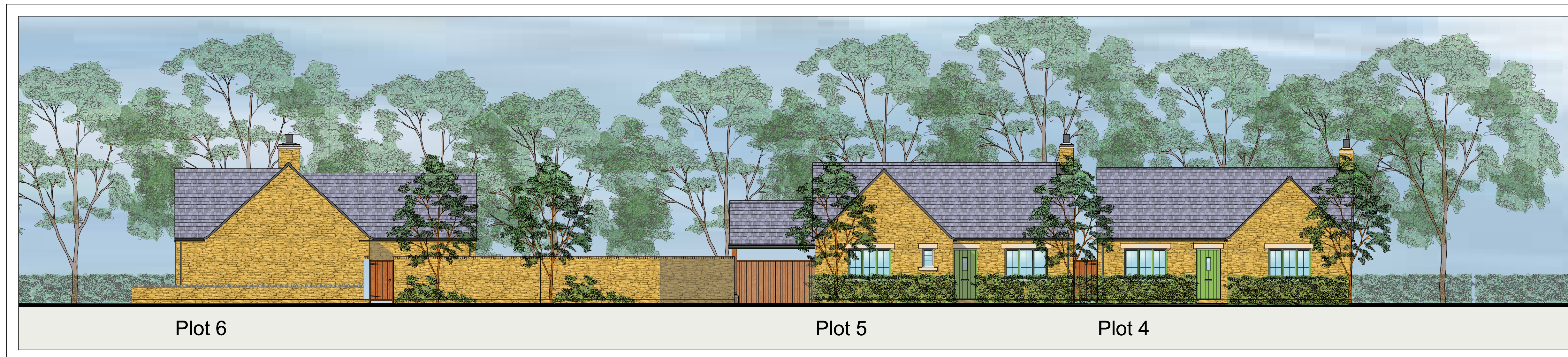
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Elevation to access road



East elevation to shared drive court



West elevation to shared drive court



Elevation to Open Space

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