

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.