

GLOUCESTER CITY COUNCIL

COMMITTEE : **PLANNING**

DATE : **2nd AUGUST 2016**

ADDRESS/LOCATION : **LAND SOUTH OF GRANGE ROAD**

APPLICATION NO. & WARD : **16/00165/OUT
TUFFLEY**

EXPIRY DATE : **5th AUGUST 2016**

APPLICANT : **HALLAM LAND MANAGEMENT**

PROPOSAL : **OUTLINE APPLICATION FOR THE
ERECTION OF UP TO 250 HOMES
INCLUDING DEMOLITION OF EXISTING
AGRICULTURAL BUILDINGS, THE
PROVISION OF NEW ACCESS,
LANDSCAPING AND OPEN SPACE
(ACCESS TO BE DETERMINED NOW, ALL
OTHER MATTERS RESERVED)**

REPORT BY : **ED BAKER**

**NO. OF APPENDICES/
OBJECTIONS** : **1. SITE LOCATION PLAN**

1.0 SITE DESCRIPTION AND PROPOSAL

- 1.1 The application relates to land to the south side of Grange Road in Tuffley Ward to the southern edge of the Gloucester.
- 1.2 The site comprises approximately 10.8 hectares (“ha”) of agricultural land. The site is broadly trapezoid shaped. The north side of the site has a frontage with Grange Road and is approximately 400 metres in length. The site then extends southwards by approximately 390 metres on its west side and by 280 metres on its east side. The site tapers inwards in a southerly direction with the south boundary of the site approximately 290 metres in length.
- 1.3 The gradient of the site rises in a southerly westerly direction from around 26.6 metres AOD next to Grange Road (at the centre point of the site) to around 35.3 metres AOD at the back of the site.
- 1.4 The application site is surrounded by agricultural land on its east and south sides. Grange Road abuts much of the north side of the site, although the road moves away from the site boundary at its north western end. Alongside the west boundary of the site is the main railway line (Bristol to Birmingham).

- 1.5 There is a residential estate to the opposite side of Grange Road to the north. This appears to have been constructed in the late 20th Century. There are four residential cul-de-sacs on that estate which have direct access off Grange Road. These are: Enborne Close, Chislet Way, Whaddon Way and Harwell Close. Bybrook Road is situated off Grange Road but further to the east. There is a large residential estate to the far side of the railway line to the west including Vincent Avenue.
- 1.6 Grange Road passes under a railway bridge to the north-west. The underpass narrows to a single vehicle width and is controlled by traffic lights. Further to the north, Grange Road has a roundabout junction with Tuffley Lane and Epney Road. Epney Road is then a short distance from Cole Avenue (A38). Grange Road links with Stroud Road (A4173) at its eastern end, about 300 metres from the edge of the application site.
- 1.7 The application seeks outline planning permission for the erection of up to 250 homes. The means of access is to be determined now with layout, scale, appearance and landscaping reserved for subsequent approval.
- 1.8 A revised indicative masterplan has been submitted in support of the application. This shows a layout of 250 homes, which is the maximum number of homes proposed by the application. A single vehicular access point is proposed from Grange Road, relatively central to the frontage of the site and approximately 40 metres to the east of the junction with Chislet Way.
- 1.9 The indicative masterplan shows a mixture of terrace, semi-detached and detached houses as well as several blocks of flats in the north-west corner. Two balancing ponds are shown: one to the north-east corner of the site next to Grange Road and the other next to Grange Road to the north-west corner adjacent the railway line. A large area of public open space is proposed at the southern part of the site. This includes an equipped play area on the east side. There would be new strategic planting alongside Grange Road and the boundaries of the site, as well as between the housing and open space.
- 1.10 The application is supported by the following information:
- Indicative masterplan
 - Planning statement
 - Design and Access Statement
 - Supplementary design information
 - Topographical survey
 - Heritage Statement
 - Archaeological evaluation
 - Landscape and visual appraisal
 - Transport Assessment
 - Travel Plan
 - Noise and vibration assessments
 - Flood Risk Assessment

- Drainage strategy
- Energy statement
- Service supply statement
- Waste minimisation strategy
- Arboricultural assessment
- Ecological appraisal

1.11 There have been no pre-application discussions with officers.

1.12 The application is referred to the planning committee because of the scale of the development and because a Section 106 legal agreement is necessary if planning permission is granted.

2.0 PLANNING POLICIES

2.1 15/00934/EIA – the Local Planning Authority screened the proposal in September 2015 under the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 and determined that Environmental Impact Assessment (“EIA”) is not required.

3.0 PLANNING POLICIES

3.1 This part of the report identifies relevant local and national planning policies and considers the weight that can be afforded to them.

Statutory Development Plan

3.2 The statutory Development Plan for Gloucester remains the partially saved 1983 City of Gloucester Local Plan (“1983 Local Plan”).

3.3 Paragraph 215 of the National Planning Policy Framework (“NPPF”) states that *‘...due weight should be given to relevant policies in existing plans according to their degree of consistency with this framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given.’*

3.4 The 1983 Local Plan is more than thirty years old and, according to the Inspector who dealt with an appeal relating to the Peel Centre, St. Ann Way (13/00559/FUL), *‘...its sheer ages suggests it must be out of date...’* (par. 11 of the Inspector’s report). Members are advised that the 1983 Local Plan is out-of-date and superseded by later planning policy including the NPPF.

National Planning Policy Framework

3.5 The NPPF published in March 2012 is a material consideration of considerable importance. It sets out the Government’s planning policies for England and how these are expected to be applied.

- 3.6 Guidance on how to interpret the NPPF is provided by online National Planning Policy Guidance (“NPPG”).
- 3.7 Annex 1 of the NPPF provides advice on the weight that should be afforded to adopted Local Plans that pre-date the NPPF, and emerging Local Plans.
- 3.8 Paragraph 14 of the NPPF says that: ‘*At the heart of the National Planning Policy Framework is a **presumption in favour of sustainable development**, which should be seen as a golden thread running through both plan-making and decision-taking...*

...For decision-taking this means:

- *Approving development proposals that accord with the development plan without delay; and*
 - *Where the development plan is absent, silent or relevant policies are out-of-date, granting planning permission, unless:*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
 - *specific policies in the Framework indicate development should be restricted.’*
- 3.9 Section 6 of the NPPF *Delivering a wide choice of high quality homes* provides national policy on proposals for new housing.

Draft Joint Core Strategy for Gloucester, Cheltenham and Tewkesbury

- 3.10 The City Council is currently working on a new Development Plan that will replace the 1983 Local Plan. The new Development Plan will comprise the Joint Core Strategy for Gloucester, Cheltenham and Tewkesbury (“JCS”) and Gloucester City Plan (“City Plan”) once they are adopted.
- 3.11 The JCS was submitted to the Government for Inspection in November 2014. Policies in the Submission Joint Core Strategy have been prepared in the context of the NPPF and are a material consideration.
- 3.12 Paragraph 216 of the NPPF states that weight can be given to relevant policies in emerging plans according to:
- The stage of preparation of the emerging plan;
 - The extent to which there are unresolved objections to relevant policies; and
 - The degree of consistency of the relevant policies in the emerging plan to the policies in the NPPF.
- 3.13 The JCS is part way through the Examination process and the Inspector published their Interim Report in May 2016. However, a number of proposed

modifications are expected to be made to the policies in the plan. The Council has received legal advice to the effect that the JCS can only be given limited weight at this time.

Gloucester City Plan

- 3.14 The Gloucester City Plan (“City Plan”) is at a much less advanced stage than the JCS. The City Plan will be presented in three parts: Part 1 will set out the context for the City Plan, including the main challenges facing the city, a strategy for development and key development principles. Part 2 will identify development management policies. Part 3 will identify development opportunities.
- 3.15 Part 1 was subject to consultation in 2012 and is to be reviewed. Part 2 was subject to consultation in 2013 on potential future development sites in the City as well as a draft vision and strategy for the city centre. Parts 2 and 3 have also yet to be completed.

Gloucester Local Plan, Second Stage Deposit 2002

- 3.16 Regard is also had to the policies contained within the Gloucester Local Plan, Second Stage Deposit 2002 (“2002 Local Plan”). The 2002 Local Plan was subject to two comprehensive rounds of public consultation and was adopted by the Council for development management purposes.
- 3.17 However, the 2002 Local Plan was never subject to Examination and was never formally adopted. In this regard, the 2002 Local Plan should only be given limited weight.
- 3.18 Members are advised that the following “day-to-day” development management policies, which are not of a strategic nature and broadly accord with the policies contained in the NPPF, should be given some weight:

ST.7	Urban Design Principles
B.7	Protected Species
B.8	Non-identified Sites
B.10	Trees and Hedgerows on Development Sites
FRP.5	Maintenance of Water Courses
FRP.6	Surface Water Run-off
FRP.10	Noise
FRP.15	Contaminated Land
BE.1	Scale, Massing and Height
BE.2	Views and Skyline
BE.7	Architectural Design
BE.8	Energy Efficient Development
BE.12	Landscape Schemes
BE.14	Native Species
BE.21	Safeguarding Amenity
BE.32	Archaeological Assessment
BE.33	Archaeological Field Evaluation

BE.34	Presumption in Favour of Preserving Archaeology
BE.36	Preserving in Situ
BE.37	Recording and Preserving Archaeology
TR.31	Road Safety
OS.2	Public Open Space Standard for New Development
OS.3	New Housing and Public Open Space
OS.5	Maintenance Payments for Public Open Space
CS.11	Developer Contributions for Education

- 3.19 The 1983 Local Plan, JCS, 2002 Local Plan and draft City Plan can be viewed at the following website address:-
<http://www.gloucester.gov.uk/resident/planning-and-building-control/planning-policy>. The NPPF and NPPG can be viewed at the Department of Community and Local Government website:-
<http://planningguidance.communities.gov.uk/>.

4.0 **CONSULTATIONS**

4.1 Highway Authority (Gloucestershire County Council)

28th June 2016

No objection – comments as follows.

- **Background** – the applicant has undertaken pre-application discussions with the Highway Authority. There have been ongoing discussions during the planning application process and additional information has been provided by the applicant as referred to in this report;
- **Site access** – the proposal is for a single priority T junction onto the southern side of Grange Road. A revised access plan has been submitted which shows extended visibility splays of 2.4 metres by 92 metres in either direction. The geometry of the junction has also been adjusted to allow for a 3 axle refuse vehicle. The access includes the provision of a new footway along the site frontage and two pedestrian crossing refuges and associated signage/lining to accommodate pedestrian access to and from the site. The proposals should help to reduce current vehicle speeds for this part of Grange Road, which exceed the 30mph speed limit. The site access and pedestrian crossing facilities have been subject to independent testing and have not raised any safety issues. Safe and suitable access for all users would be provided;
- **Layout** – the internal layout is not being considered at this time because Layout is a reserved matter. The indicative masterplan shows additional cycle/footway links to the east and west of the proposed access to provide a direct link to the proposed pedestrian cross refuges on Grange Road to maximise sustainable travel options;
- **Parking** – the submitted Transport Assessment refers to outdated parking standards. It is accepted that the applicant will need to robustly

demonstrate that the level of parking proposed at the reserved matters stage will be sufficient. In addition, visitor parking will be required at a ratio of 1 space for every 5 homes. This is of paramount importance if shared streets are proposed. If garages are to count towards the overall parking provision then the minimum internal dimensions shall be 3 metres by 6 metres. These points have been accepted;

- **Accessibility** – the proposal includes a footway along the site frontage alongside Grange Road. There are realistic opportunities for sustainable travel for future occupiers to access local facilities. There are a range of facilities and services within reasonable walking and cycling distance of the site including primary and secondary schools; local convenience shops; doctors; dentists; pharmacy; leisure centre; library; public house; nursery and post office. *Manual For Streets* advises that walkable neighbourhoods have a range of facilities within 800 metres but recognise that this is not an upper limit and that walking offers the greatest potential to replace short car trips under 2 km with cycling distances less than 5 km. The Highway Authority is satisfied that the site is located in an accessible location;
- Grange Road forms part of an on-carriageway cycle route that links through the residential area of Tuffley and Stroud Road where dedicated cycle lanes exist;
- There are several bus routes that are within a reasonable walking distance from the site along Grange Road, Roberts Raikes Avenue; Stroud Road and Windsor Drive. The bus route that occupants of the development will most likely use is the No. 9 service, which operates from Gurney Avenue within a 5 minute walking distance from the site and which runs every 15 minutes to Gloucester City Centre. The No. 63 service operates from Stroud Road and provides a 30 minute service to Forest Green, Nailsworth and Stroud. The No. 10 service that links Lower Tuffley to Gloucester, Brocksworth and Cheltenham runs every 10 minutes. This is accessed from Windsor Drive and whilst it is a longer walk from the site, it does provide access to a wider choice of destinations for employment, shopping etc.
- Gloucester Railway Station is located approximately 4 km away and can be accessed via public transport or by bicycle using the existing cycle network. The station has access to a number of towns and cities including Birmingham, Bristol, Cardiff, Cheltenham, Chepstow, Derby, London, Nottingham, Stroud, Swindon and Worcester.
- The Highway Authority is satisfied that the proposed development has adequate access to walking, cycling and public transport routes so that opportunities can be provide for sustainable modes of transport.
- **Baseline conditions** – the applicant has agreed the extent of the study area with the Highway Authority. The study area includes Grange Road, Stroud Road and Cole Avenue. Traffic surveys have been undertaken by the applicant September 2015. These show that the peak hour on the highway network is 7:45 to 8:45 hours in the AM period; and 17:15 to 18:15 in the PM period. The Highway Authority is

satisfied that the applicant's data is comparable with traffic counts undertaken by Gloucestershire County Council.

- **Junction capacity assessment** – the modelling has assessed the capacity of the following junctions using a 2015 baseline scenario:
 - Grange Road/Stroud Road Priority T junction
 - St. Barnabas Roundabout
 - Epney Road/Tuffley Lane Roundabout
 - Cole Avenue/Epney Road Signalised Crossing
 - Tuffley Lane/Stroud Road
 - Grange Road Railway Bridge
- Grange Road/Stroud Road Priority T junction – the junction is shown to be operating within its design capacity for both the AM and PM peak periods with significant spare capacity;
- St. Barnabas Roundabout – the revised modelling for this junction has been accepted by the Highway Authority and shows the roundabout to be operating close to capacity with queuing observed;
- Epney Road/Tuffley Lane Roundabout – the junction is shown to be operating within its design capacity for both the AM and PM peak periods with significant spare capacity;
- Cole Avenue/Epney Road Signalised Crossing – the junction is shown to be operating within its design capacity for both the AM and PM peak periods with some capacity with a maximum queue of 29 passenger cars on Cole Avenue East in the AM peak;
- Tuffley Lane/Stroud Road – the junction is shown to be operating within its design capacity for both the AM and PM peak periods with significant spare capacity;
- Grange Road Railway Bridge – the traffic signals operate satisfactorily.
- **Future year baseline condition** – a future traffic figure of 2021 has been used because this coincides with when the development should be complete. Regard has been had to the development proposals at Winnycroft Lane (which do not have planning permission yet), Kingsway and Hunts Grove;
- **Development traffic flows** – the expected trip generation from the site has been calculated using TRICS data. The assessment has been carried out on the basis of 300 homes (not up to 250 proposed by the application) so that it is robust. The assessment estimates the generation of 141 two way trips in the AM peak hour and 142 two way trips in the PM peak hour;
- **2021 growth traffic flow + development traffic junction capacity**
- Grange Road/Stroud Road Priority T junction – the junction is shown to be operating within its design capacity for both the AM and PM peak periods with spare capacity;
- St. Barnabas Roundabout – this junction is shown to be operating over capacity both with growth traffic alone. When development traffic is

added performance at the junction deteriorates further. The development traffic is estimated to increase traffic queues by 12 cars in the AM peak period and by 19 cars in the PM peak;

- Epney Road/Tuffley Lane Roundabout – the junction is shown to be operating within its design capacity for both the AM and PM peak periods with significant spare capacity;
- Cole Avenue/Epney Road Signalised Crossing – this junction is shown to be operating close to its capacity with growth traffic alone. When development traffic is added the performance of the junction deteriorates further but still remains within operational capacity. The impact of the development traffic is not considered to be severe to require mitigation for the AM peak period. The PM peak period shows that the junction is operating with some spare capacity;
- Tuffley Lane/Stroud Road – the junction is shown to be operating within its design capacity for both the AM and PM peak periods with significant spare capacity;
- Grange Road Railway Bridge – the signals at this junction still operate with spare capacity with the growth traffic and development traffic with an increase in queuing of approximately 1 car. The assessment predicts 18 pedestrians using this junction in both directions during the AM and PM peak periods. This equates to an average of one additional pedestrian every 3 minutes. The length of restricted footway through the bridge is approximately 40 metres and applying an average walking speed of 1.4 metres per second the journey would take approximately 29 seconds. This delay is not considered severe should a parent with child meet another pedestrian travelling in the opposite direction;
- However, the bridge is a constraint on the local road network and there is a lack of lighting that could discourage walking trips during the hours of darkness. In order to take up the opportunities of sustainable travel, a lighting scheme could be implemented to make this a more attractive route. The Highway Authority has prepared an indicative lighting scheme with cost estimates for the installation of 2 new street lights with one at either side of the bridge. It would be reasonable for the Local Planning Authority to seek a contribution towards the provision of this lighting and this can be secured as a planning obligation;
- **Highway safety/personal recorded collisions** – an analysis of records between 2010 and 2015 has been carried out. The majority of collisions have occurred on the main routes within the study area such as Stroud Road, St. Barnabas, Tuffley Lane and Cole Avenue. The immediate area has an excellent safety record with no recorded collisions along Grange Road. The available evidence suggests that the collisions are attributed to driver/rider/user behaviour and not as a result of the existing highway infrastructure itself.
- **Public rights of way** – the existing public rights of way are not affected by the proposed development.

- **Mitigation**

- St. Barnabas roundabout – the modelling shows that queues will significantly increase as a result of the proposed development. The residue cumulative impact of the development will be severe without mitigation as congestion worsens and queues significantly increase. Gloucestershire County Council has secured provisional funding via the Local Enterprise Partnership for £1 million towards a highway improvement scheme for St. Barnabas junction. The scheme is expected to exceed the provisionally allocated funding and the most recent cost estimate was £1,102,648 (March 2016). It would be necessary for the application to provide a contribution of £102,648 towards the highway improvement scheme to mitigate the impact;
- Walking improvements – a contribution of £6,000 towards the lighting improvements to the Grange Road bridge is sought, which will encourage walking. There is also a lack of tactile paving along the residential junctions with Grange Road opposite the site. These works can be secured by means of a planning condition;
- Cycling – there is a lack of cycling parking at the shopping parades at Holmleigh and Seventh Avenue that would likely discourage cycle trips due to a lack of secure bicycle parking. A contribution of £2,000 should be sought to provide cycle stands at both these locations.
- **Travel Plan** – the applicant has agreed to amend their approach to the Travel Plan by bringing forward initiatives to promote sustainable travel (and not leaving it to after 75% occupation). Also, to target between 5-9% reduction in single occupancy vehicles.

Recommendation:

The Highway Authority advises that safe and suitable access to the site can be provided. Opportunities for sustainable transport modes have been taken up. The Highway Authority is satisfied that the residual cumulative impacts of the proposed development would not be severe subject to the following obligations and planning conditions being secured:

Planning obligations

- £102,648 towards the St. Barnabas highway improvement scheme;
- £6,000 towards street lighting improvements at the Grange Road railway bridge; and
- £2,000 towards the installation of cycle parking at Holmleigh Parade and Seventh Avenue Shopping Parade.

Planning conditions

- Construction of access, prior to other development;
- Submission of Layout as a reserved matter;
- Details of the proposed pedestrian links from the north west and south east of the site along Grange road, prior to occupation;

- Provision of parking layout;
- Provision of uncontrolled pedestrian crossings to the east and west of the proposed access along Grange Road and footway along Grange Road, prior to occupation;
- Provision of tactile paving at the pedestrian dropped kerbs at the junctions of Grange Road with Bybrook Gardens, Harwell Close, Whaddon Way, Chislet Way and Enborne Close, prior to occupation;
- Implementation of approved Travel Plan;
- Provision of Construction Method Statement;
- Provision of fire hydrants; and
- Arrangements for the future management and maintenance of the proposed streets to be agreed.

29th June 2016

Comments as follows:

- No further comments with respect of the information submitted by the applicant in June 2016; and
- Regarding the future parking proposals, these refer to the South Gloucestershire parking standards, which is not entirely appropriate. The proposed parking standards have been reviewed and this appears reasonable, but will need to be justified by car ownership levels at the reserved matters stage. It should be noted that 1.5 spaces for a 2 bed house would place a demand of an extra unallocated space for every pair of 2 bedroom houses. The Highway Authority is satisfied that this provision can be designed into the layout. The provision of visitor parking is acceptable.

7th July 2016

- Clarifies why the specific sum of £102,648 is required towards improvements to St. Barnabas roundabout. With regard to the level of contribution, the Highway Authority has sought the shortfall in funding as there are no further allocated/committed sites in the locality to apportion costs based on the level of impact. The development will have a material impact on the St Barnabas junction and it is evident from Table 8.1 of the applicant's Transport Assessment that there will be percentage increase on the Stroud Road (N) arm, Finlay Road and Stroud Road (S) in both the AM (Combined increase on all arms 8.3%) and PM peak hours (Combined increase on all arms 10.3%). This equates to approximately 8-10% of the total costs for Gloucestershire County Council delivering the scheme.

4.2 Local Education Authority (Gloucestershire County Council)

Comments as follows:

- The scheme has been assessed for education contributions. Contributions will be required towards pre-school, primary, secondary schools and to libraries;
- The specific purpose of the contributions will be to create additional places at the named schools, which are at or forecast to be at capacity. The schools are Tuffley Primary School and Beauford Co-operative Academy;
- A contribution towards pre-school provision will also be required; and
- The commuted sums are as follows:
 - Pre-school – £216,283
 - Primary – £772,438
 - Secondary – £706,800
 - Libraries – £49,000
 - Total – £1,744,521**

4.3 Planning Policy Team (Gloucester City Council)

8th April 2016

No objection – comments as follows:

- There is a tension between the 2002 Local Plan and emerging Development Plan policy. This is because the 2002 Local Plan identifies the southern part of the site as a Landscape Conservation Area where largescale development would be considered unacceptable; whilst the emerging JCS and City Plan identify the need for new housing, coupled with an updated landscape evidence base which moves away from Landscape Conservation Area designations;
- The NPPF seeks to boost the housing supply across the country by requiring local planning authorities to demonstrate a 5 year supply of housing land + 5% buffer. The NPPF also provides guidance on conserving landscape and scenic beauty in Areas of Outstanding Natural Beauty (“AONB”). The site is not within an AONB nor does it lay immediately adjacent to an AONB;
- The JCS has reached an advanced stage. The Examination in Public commenced in May 2015. The JCS submission in November 2014 identified the need for 30,500 homes across the JCS area for the period 2011-2031. The housing requirement for Gloucester was 11,300 homes. During the course of the Examination in Public, the Inspector identified the requirement for uplift in the overall figures to 33,500 homes. At the time of writing, this remains the published target figure;
- The City has an indicative capacity of 7,917 homes. The JCS strategy for meeting the City’s unmet housing need is through urban extensions and strategic allocations to urban areas;

- Relevant policies in the emerging JCS are: Policies SD4, SD5, SD7, SD9, SD10, SD11, SD12, SD13 and INF1 to INF8;
- The site is not allocated for residential development in the 2002 Local Plan. The 2002 Local Plan identifies the site as partly “white land” and partly as lying within a Landscape Conservation Area. That part of the site that is in the Landscape Conservation Area is not proposed to be developed by the planning application;
- Quotes Policy LCA.1 (Landscape Conservation Areas) and Policy FRP.10 (Noise) of the 2002 Local Plan;
- Work undertaken in 2013 on the search for new housing land identified the following issues for Tuffley Ward:
 - A low number of privately rented homes
 - Pockets of deprivation
 - Shortfall of public open space
 - Shortfall of playing pitches
 - Shortfall of play equipment
- The Planning Policy Team advises that the proposed development would provide the opportunity to address some of the weaknesses in the Ward which were acknowledged by the local community and local ward members alike;
- The site was submitted for consideration in the first published Strategic Housing Land Availability Assessment (“SHLAA”) in 2009 when it was found to be unsuitable for development on the grounds of landscape impact, access and distance to employment and services;
- The site remained unsuitable in the SHLAA until 2012 when additional JCS evidence on Landscape Characterisation and Sensitivity Analysis became available. This identified that the site is not within an area of “high” landscape value. The site was considered as being “suitable”, “available” and “deliverable” from 2012 onwards;
- New landscape evidence commissioned by the Council in 2013 demonstrated that the part of the site adjacent Grange Road and outside the Landscape Conservation Area would potentially be suitable for development. The 2013 Strategic Assessment of Land Availability (“SALA”) gave the site a capacity of 198 homes. The 2016 SALA uplifts this figure to 220 homes, reflecting the application for up to 250 homes;
- Given that the City cannot meet its housing need within the Local Plan period and requires contributions from JCS strategic allocations located in the green belt within Tewkesbury Borough Council in accordance with the “duty to cooperate”, within the first five years in order to achieve a 5 year housing supply, it is important that all sites that have the potential to contribute to City Plan capacity are brought forward in accordance with the requirement of paragraph 47 of the National Planning Policy Framework. The thrust of national policy, emerging

policies and this evidence is that the site has, in principle, the potential to contribute to the City's housing need for the plan period 2011-2031;

- This site already contributes to the City's five year housing land supply calculation, therefore, the Planning Policy Team is supportive of the application site being considered for residential development; and
- Members should take account of paragraph 14 of the NPPF, which requires local authorities to proactively plan to meet the development needs of their area and for decision taking to approve development that accords with the development plan. The paragraph also implies that not granting permission for sites that are proactively plan led will result in other "sustainable" development proposals being considered acceptable for growth – the principal of sustainable development being the golden thread that runs through the NPPF.

18th July 2016

The Planning Policy team advises that the Council cannot demonstrate a five year supply of housing land as otherwise required to do so by paragraph 47 of the NPPF. The following issues are factors:

- The overall housing requirement for the Joint Core Strategy, and in turn Gloucester City, is still subject to debate with the JCS Inspector's Interim Report recommending that the objectively assessed housing need for the JCS being uplifted by 5% from 33,500 new homes to 35,175 homes; and
- The delivery of housing through the JCS is reliant on strategic housing sites coming forward on Greenbelt land. Such land is nationally protected and this strategy has not been formally endorsed through adoption of the JCS, which is still in the process of being examined.

4.4 Housing Team (Gloucester City Council)

18th July 2016

Comments as follows:

1. Meeting affordable housing Need in the City

'This site and Outline application for 250 homes represent a significant opportunity to meet the need for affordable housing in the City. Previous comments have identified the acute shortfall of Affordable Housing in the City and referred to the updated SHMA (Sept. 2015) evidence base. The Joint Core Strategy examination has also highlighted the negative market signals that show an acute imbalance between supply and demand, creating issues around affordability. Joint Core Strategy Policy updated SD13 – Affordable Housing states that "where the viability of a site may enable additional levels of housing to be delivered above the requirements set out in this policy the JCS authorities will negotiate with developers to find an appropriate balance to deliver Affordable housing and infrastructure needs".

We would therefore expect the developer to demonstrate what affordable housing contribution can be achieved on this site through the provision of a viability assessment.

2. House types proposed

An appropriate mix of dwelling sizes, types and tenures should meet the needs of the local area, including for older people.

Preferred mix of affordable homes

Please see the following table based on the provision of 40% Affordable Housing:

	Rent	Shared Ownership	
Number of Bedrooms	Units required	Units required	Totals
One	14	0	14
Two	31	16	47
Three	24	9	33
Four	5	1	6
Totals	75	25	100

It should be noted that preliminary evidence suggests that there is limited demand for the emerging Starter Homes tenure in Gloucester given the existing relatively low open market values in the City.

As an authority we would support a varied mix of open market housing that would assist in meeting a range of aspirations within the open market. The most recent Strategic Housing Market Assessment sets out the clear need for a wide range of house types both affordable and open market to meet the needs of the City. It is difficult to understand how these needs and aspirations will be met, or indeed what the viability of the site is, without a more detailed understanding the mix and size of units that would be built on the site. This would allow the planning authority to consider whether the proposed mix is indeed suitable to help balance the Gloucester Housing Market. The NPPG makes reference to needs of specific groups such as first time buyers, older person and those with disabilities.

3. Density of affordable housing

The mix of affordable housing will determine the density and as stated we would expect an appropriate mix of dwelling sizes on what is a relatively large development. As such the specified number of one and two bedroom units as apartments that will increase the scheme density. In terms of layout we would expect to see small clusters of affordable housing of between 6-8 units across the site.

4. Special needs housing

We expect that the contribution will also ensure the delivery of homes that are both adaptable and adapted to meet the needs for older and disabled households. The developer should demonstrate how the development will go to meet the needs of the City's ageing population as well as meeting the need for households with a disabled member or wheelchair user. The Council can demonstrate a need for such housing and the JCS Policy makes reference to meeting their needs and the need for high quality design.

We suggest also that the developer considers the opportunity to provide housing to downsize both in terms of open market units and affordable housing, in relation to such accommodation the quality of design and build is crucial to its success.

Please see also previous commentary regarding homes for people with learning disabilities.

The provision of special needs adapted and adaptable housing will need to be detailed.

5. Design and Environmental Standards

It is important that any resulting Section 106 agreement ensures that the quality in terms of design and size of the units. The development should be tenure blind so that there is no discernible difference in the design of the open market and affordable homes. A fabric first approach to energy efficiency is recommended and liaison with Registered Providers regarding size and environmental standards is suggested as well as taking account of the current National Housing Standards.'

4.5 Neighbourhood Services Manager

14th April 2016

Comments as follows:

- The low ridge across the southern part of the site forms an important view that helps to protect the setting of the southern part of Gloucester. This was identified in Bridges study of 1998, and backed up by the more recent WSP study of December 2013;
- Both reports and the JCS landscape sensitivity study conclude there is little intrinsic value in the landscape given its intensive management and lack of features. I have no objection in landscape terms to its development, however, the functionality of the ridge and the need to use this to protect views from the south is imperative;
- Before any application is evaluated, I recommend that views from the south, especially the public footpath network and Naas Lane, are

submitted so the impact can be evaluated. This will probably be a photomontage confirming what would be seen (rooflines etc.) from these strategic viewpoints;

- While not so important, views from Robinswood Hill and potentially the Cotswold Area of Outstanding Natural Beauty need to be shown and mitigation proposed to ensure the development is, at least to a degree, assimilated into the wider landscape; and
- It is noted that the hedge is to be retained in the illustrative layout. While this broadly follows the low ridge and would seem sensible to mitigate any impact, this will conflict with the need to overlook what appears to be open space to the south. Given the very poor nature of the hedge it would be better to remove at least part of it and plant a new mixed hedge to the south of the site before the land begins to drop away. This would still protect views from the south and allow better management of the open space.

15th July 2016

No objection – comments as follows:

‘The views from Naas lane and the footpath network to the south appear to be satisfactory. This is not necessarily the case however when looking from the South East.

View point 3 is close to the development and there is little getting round the issue that the proposal will be clearly visible in the foreground. Structure planting on the edge of the site and within it to break up the mass will assist in mitigating against the impact and this can be conditioned in the usual manner. View 2 is of more interest as this is in effect what many will see when travelling towards Gloucester down the Stroud Road. It shows the South Eastern corner of the site as skyline development and again is to a degree mitigated by landscape planting. It is considered however, that the visibility of the site could be significantly reduced if the heights of buildings especially in the south eastern corner were lowered.

I am confident therefore that with careful planting and the building heights sensibly controlled on the periphery of the site then the development would appear acceptable.

I have no objection to the proposal on landscape grounds subject to the normal landscape condition and a condition that controls the heights of the first line of the buildings in the SE corner.’

4.6 Urban Design Officer

No objection – comments as follows:

‘I have no overall objection to this application. During the discussions with the applicants, the issue of density and the level of submitted information were

raised. The originally submitted Illustrative Layout plan only showed 170 units out of the 250 being applied for, but this has subsequently been amended to reflect the full amount. I also requested three more detailed sketch layouts be produced which each focussed on a different part of the development. This was to better demonstrate that the site could be developed at a density of around 40 dwelling per hectare (D/Ha).

In principle, I do not object to higher density residential design, partly due to the fact that as a city, we need to make better use of the very limited and finite amount of space within the city boundary. Higher densities can in theory at least, provide homes for a greater number of people, therefore meaning urban areas do not spread in an uncontrolled way, leading to forms which are totally car dependent and unsustainable.

However, the theory of higher densities has to be considered very carefully in terms of the reality of the issues which are generated. One of the main issues is the impact that an additional 250 homes will have on the existing transport network, as well as the on-site demand generation for car parking. Increasing the number of 2-4 bedroom housing will simply mean more of the overall space within the site must be devoted to parking, because that range and type of housing will inevitably lead to the greatest demand for parking. If the density is increased with single-bed apartments, that could proportionally lower overall demand for parking across the site, but this type of accommodation would not necessarily meet housing need or market aspirations.

The extremely peripheral and fundamentally unsustainable location of the site itself, on the very edge of the urban area and furthest distance from the city centre, means that higher densities will have the biggest impact, due to the lack of appropriate bus and sustainable transport options

While I am satisfied that an adequate level of parking can physically be designed into the site to meet demand, there will inevitably be impacts from that level of parking on the functioning, appearance and amenity value of any final development. One key issue in reality will be how people choose to use the garages on site. If garages can be provided which are wide enough to realistically accommodate a car which allows doors to be opened, more people will choose to use them for parking cars, rather than for storing household items. Ideally, garages should be wider than the 3m x 6m internal dimensions set out by County Highways, to accommodate car parking and storage.

If garages are not used for parking, it places even more pressure on the external public realm to accommodate parking, which can very easily lead to the majority of the public realm being devoted to the access and parking of cars. This inevitably leads to issues of hard landscapes dominated by tarmac, with green spaces merely introduced in the left-over areas within and around the tarmac. This places a real pressure on the need for good street trees, which line roads and help to soften areas of parking. The other way to break up the sea of tarmac is to vary hard landscaping materials, in terms of colours

and textures. On-street allocated or visitor parking could be formed from smaller concrete setts, while pavements could follow this approach, but with larger slab sizes.

I have checked the three more detailed sketch plans which have been submitted and they are acceptable. I would suggest that these plans are not directly referenced within the permission, or wording to the effect of 'notwithstanding the design or layout which is represented in the submitted plans', in order to allow some flexibility and the possibility of alterations in the final design.

The accompanying car parking plans are useful in identifying where each parking space will be for each property. The approach of using the South Gloucestershire parking standard is fine but there will be real issues when the 1.5 spaces per 2-bed property are divided up. Careful placement of spaces is needed as well as allocations, given the problems which can arise.

Overall, the general layout is quite logical with mainly perimeter type blocks of houses which back onto each other and which clearly define and overlook the public realm. The single access point off Grange Road may have to be signalled to allow the significant rush hour traffic flows out of and into the development. Built form facing the railway is the best approach and is more effective than facing gardens towards that boundary. A green corridor should be maintained or introduced along Grange Road, partly to retain the hedge and ditch where it exists but also to reinforce the idea of this development having some kind of green or rural setting. This will help to mitigate a small part of the visual or perceived impact from the development.'

4.7 Landscape Architect (Public Open Space)

Comments as follows:

- The site is Greenfield and we would expect to see a certain level of on-site open space provision, including facilities for formal sport and play;
- Public Open Space ("POS") is calculated on bed numbers. As the application is in outline, the housing mix has been estimated. On site provision of 2.7 ha should be provided (based on a mix of 25 x 1 bed; 25 x 2 bed; 160 x 3 bed; 35 x 4 bed and 5 x bed homes). The POS should be provided in useable parcels of 0.2 ha minimum and to include formal sport and formal play facilities;
- We would seek sports provision of at least one senior football or rugby pitch with associated changing rooms and car parking;
- Should these not be provided on site then a commuted sum would be required to be secured by a Section 106 legal agreement. The calculation indicates 1.7 ha for formal sport and 0.6 ha for formal play;
- The commuted sums required from the estimate housing mix are:
 - **Sport** – £895,934.40

- **Play** – £311,874.30
 - **General** – £125,350.80
 - **Total** – £1,333,159.50
- The proposed play area should be a NEAP for this size of development, which should be at least 1,000 sq. m. in size and include a multi-use games area and wheeled sport facility;
 - Questions how the acoustic screening next to the railway would affect the existing vegetation in this area. Hopefully, the existing vegetation can be retained in order to soften views across the development;
 - The SUDS ponds may not necessarily be acceptable as public open space and this will depend on their design. Any public open space SUDS features must be designed so as to allow safe access and use by the public for informal recreation, be natural in appearance and not heavily engineered;
 - The public open space should be visually connected to the new housing. The solid planted buffer between the houses and open space (shown in the original masterplan, which has since been revised) would be unacceptable;
 - The Council has a policy of provision of allotments at 0.2 ha per 1,000 population (or an off-site contribution to be agreed); and
 - Section 106 heads of terms should include reference to public open space, including commuted sums for maintenance of any open space that the Council would adopt.

4.8 Conservation Officer

Comments as follows:

- The applicant's Heritage Statement demonstrates that the farm buildings are identified on the 1799 map. They are therefore an undesignated heritage asset of local interest. The NPPF states that the impact of proposals on a non-designated heritage asset should be taken into account. A balanced judgement will be required having regard to the scale of any harm or loss to the significance of the heritage asset (par. 135);
- The barns are the last surviving structures belonging to Tuffley Farm and are of local significance. The barns have interesting brickwork and some original timber framing and could be converted as part of a residential scheme;
- Any historic hedgerows should also be retained;
- The site has been assessed for heritage value. The "SUB44" report states that the site: '*...holds interest because it contains the historic buildings now known as Tuffley Farm which are late 18th Century in date. The earthworks ridge and furrow in the northern part of the site,*

particularly around the historic buildings, is also important as a relic example of medieval farming techniques.'

- Retention of the historic farm buildings would be an enhancement to the site. These buildings would be best incorporated into a development scheme and could be converted to provide housing or communal space;
- The hedgerows across the middle of the site should be retained within any development. This hedgerow follows the line of a footpath visible on the first edition Ordinary Survey and possibly on the 1799 map. This would also be an enhancement to the area;
- A key dimension of sustainability is protecting and enhancing our historic environmental and heritage assets should be conserved in a manner appropriate to their significance. Paragraphs 126 to 141 are the core historic environmental policies. Reference is made to paragraphs 131 and 135 of the NPPF. Reference to the 1983 Local Plan, 2002 Local Plan and emerging JCS. Proposals that secure the future conservation and maintenance of heritage assets and their setting that are at risk through neglect, decay or other threats will be encouraged. Proposals that will bring vacant or derelict heritage assets back into appropriate use will also be encouraged.

4.9 Crime Prevention Design Advisor (Gloucestershire Constabulary)

12th July 2016

Comments as follows:

'I would like to express **serious concerns** with regards to the increased density in the middle of the site, the considerable permeability of the site and the capacity for the junction and surrounding roads to cope with the increase in traffic.

I would like to draw your attention to the PDF document attached to the carrying e-mail which provides detail to the following observations for your consideration.

1. Reducing the permeability of the site and blocking off certain roads will improve security and safety;
2. Rear alleyways – the design of this development should reflect the available space, fenced alleyways providing rear access will be problematic;
3. Assessments will be required of neighbouring traffic junctions to cope with traffic demand;
4. Residents need good views of where their vehicles are parked. In-curtilage parking should be used to improve vehicle security and prevent congestion likely to cause issues and conflict. Parking spaces and garages should relate to each property to encourage security;
5. Long private driveways should be gated;
6. Front gardens should have defensible space;

7. The Western boundary of the Site should be strengthened to protect intrusion from the Railway line and intrusion onto it;
8. Planting should not restrict surveillance opportunities, assist in climbing or create hiding places. Planting along footpaths needs to be carefully considered to ensure it will not grow over the path, restricting the width, creating narrower and less inviting areas. Landscaped areas will need to be managed;
9. The boundaries abutting a POS or footpath should be reinforced with a line of defensive planting to restrict garden thefts and burglary;
10. Vehicle mitigation should be designed into the entrances of any footpath exceeding 1.5m wide;
11. Water areas should be landscaped to prevent vehicular access and resulting environmental pollution;
12. Road edging should include off-road mitigation to prevent inappropriate access and parking;
13. Public open spaces and play areas should be managed and maintained for prolonged community involvement; also ensuring the extended life of the drainage system. The NEAP lacks surveillance;
14. The lighting plan should be designed to encompass the development and allow for seasonal variations within the planting scheme; thereby removing areas of deep shadow to reduce the fear of crime, along with opportunities of crime and Anti-Social Behaviour; and
15. Apartments should have defensible space and security provision for communal living with consideration given to access control, postal security and utility meters.

It is recommended that the development is built to meet Secured by Design standards. (Doors and windows to be PAS 24:2012). Secured by Design (SBD) is a police initiative, to encourage the building industry to adopt crime prevention measures in the design of developments.'

4.10 Tree Officer

Comments as follows:

- The arboricultural assessment undertaken is adequate for validation purposes. There is very little in the way of arboricultural interest, on or just off site. The proposal actually presents an opportunity to increase tree cover in the area. As ever, the challenge is to ensure all the proposed trees on the masterplans/illustrative layouts actually get planted. The Tree Officer would like to see tree planting along the Grange Road frontage using avenue style trees that will grow to an ultimate size to have an impact on the area, not species of a much lesser quality. The Tree Officer would also not rule out tree planting on the raised land to the south of the proposed housing – a real chance to make a local landscape feature.

4.11 City Archaeologist

No objection – comments as follows:

- The application site has been subject to archaeological evaluation (trial trenching and geophysical survey) which has established that archaeological remains of prehistoric, Roman and medieval date survive throughout the site. These remains include finds of Mesolithic and Bronze Age date and archaeological features of Iron Age, Roman and medieval date; and
- With regard to built heritage; the 'agricultural building' within the site is a barn which is over 200 years old, as such it is considered to be a non-designated heritage asset.

The following planning conditions are recommended:

- Secure the implementation of a programme of archaeological work in accordance with a written scheme of investigation; and
- The recording of significant elements of the historic built environment (i.e. the agricultural buildings) with appropriate archiving and public dissemination of the findings.

4.12 Lead Local Flood Authority (Gloucestershire County Council)

1st March 2016

Comments as follows:

- The site is within Flood Zone 1. The Lead Local Flood Authority ("LLFA") is aware of property flooding in the vicinity of Grange Road. The site naturally drains to the north towards the Whaddon Brook rather than south to Daniels Brooks catchment;
- The infiltration tests carried out by the applicant clearly show that soakaways will not be effective and an alternative method is required. The LLFA questions whether the SUDS hierarchy has been fully considered and whether the potential to discharge to the existing watercourse to the north of the site (Whaddon Brook) has been fully explored. There is evidence of an outfall on the site's northern boundary with Grange Road;
- The following points need to be addressed:
 - Evidence that the SuDS hierarchy has been fully considered
 - Clarification is required that the proposal to discharge at QBar i.e. 11.8 l/s is inclusive of all events up to and including the 1 in 100 year rainfall event?
 - Calculations have been provided to support the storage of surface water runoff up to and including the 1 in 100 year storm event plus climate change. This has been based on the impermeable area of the development. The proposed layout of the development as shown in the applicant's 'Illustrative Surface Water Drainage Strategy Plan' drawing no. 10377-DR-1 shows an area of public

open space at the south of the site with a maximum level of 35m AOD. The northern part of the open space will drain onto the proposed developable area and be captured by the site's positive drainage system Unless the applicant can show that this additional surface water runoff from the open space will not be captured by the site's drainage the appropriate increased storage should be calculated and provided.

- The applicant proposes to utilise the existing ditch on the western border of the site to facilitate surface water flows. Evidence and clarification of the appropriate connectivity, condition and capacity of the ditch and any other conduit used to carry flows to the Severn Trent sewer are required. No open ditch is evident on the western boundary (as noted from Grange Road) although there is evidence of some form of ditch on the eastern boundary.
- The updated Flood Map for Surface Water shows Grange Road at flood risk in the 1 in 30 year storm event on the highway NE of the proposed site, midway along the site and at the entrance to and through the railway tunnel. It is noted in the FRA that surface water currently flows from the site area onto Grange Road where highway gullies then carry the flow to the Severn Trent storm sewer. Evidence is required that surface water from the development can be effectively discharged to the Severn Trent sewer in Grange Road during these rainfall /flood conditions and nor increase the flood risk.

Recommends the following conditions if permission is granted:

- Submission and implementation of a detailed drainage strategy;
- Evidence of water company consent to accommodate the maximum permitted discharge rate (if the discharge rate is not accepted by the water company then an alternative drainage scheme shall be submitted for approval by the Local Planning Authority).

The LLFA advises that management of SUDS is a matter for the Local Planning Authority.

12th July 2016

Comments as follows:

- The LLFA is in receipt of the additional information provided by the applicant. It notes that the detention basin capacities and discharge rates are adequate for the site run-off and from the open space to the south and the east;
- Remains concerned as to whether surface water from the site can be effectively discharged to the Severn Trent sewer in Grange Road up to and during a 1 in 30 year rainfall event. The surface water flood maps and the photographic evidence from the community suggest that the

sewer may be inundated during these events which could result in flooding on the proposed development. Unfortunately, the applicant has not provided any additional information to satisfy this point. The information should be provided now rather than deferred by condition.

4.13 Drainage Officer

Comments as follows:

Flood Risk at the Site

'The development site is located in Flood Zone 1 and so I do not have any concerns about fluvial flood risk at the site. Similarly, the surface water flood mapping does not highlight any issues.

Impact of the Development on Flood Risk Elsewhere

An infiltration test report was provided by the applicant. It is accepted that the soils are not sufficiently permeable to allow infiltration as means of surface water runoff disposal.

In line with pre-application communications, as long term storage is not being provided, the applicant is proposing to limit surface water discharge from the site to QBar. This will apply to all events up to the 100 year + 30% climate change event. The proposed figure of 3.4 l/s/ha is acceptable. The peak discharge from the site will be set at 11.8 l/s based on the proposed impermeable area of 3.47 ha. I raised concerns over the volume of storage being provided in the eastern basin, as the applicant had not allowed for the overland flows which arrive in this area from the adjoining field. As a result of these comments, the applicant increased the available attenuation volume in this basin from 1,343 m³ up to 3,000 m³. I am now satisfied that there is adequate storage volume.

Given the conservative 'QBar' approach taken, the proposals should reduce flood risk in the Harwell Close / Grange Road area for storms up to in excess of a 100 year + climate change event.

Independent to this development proposal, Gloucester City Council is in the process of delivering a flood mitigation scheme to extend the bund opposite Harwell Close. The impact of this flood mitigation scheme is that in the (unlikely) event of the eastern attenuation basin overtopping, the flood routing would be towards the junction of Grange road and Harwell Close. Further improvement works which we are carrying out at the junction will facilitate the passage of flood water into the brook.

It should however be pointed out that none of the above works would prevent flood water entering Harwell Close in the event of a 2007 magnitude flood. Nonetheless, the flood barriers which Gloucester city Council has provided in Harwell Close should prevent flooding property flooding here.

SuDS (General / Water Quality)

Following my initial comments about the paucity of SuDS features on the plans, the applicant has improved the SuDS provision by augmenting with swales and permeable paving. I am now satisfied that there is adequate SuDS provision from a water quality perspective.

When the applicant originally doubled the eastern attenuation basin volume, they kept the area which it is to fit into the same size. I was concerned that the basin would therefore be shoe-horned in and with inadequate space from the perspectives of safety, maintenance and aesthetics. Following some protracted discussions, we were presented with an increased footprint to accommodate the eastern basin. I am now satisfied that there is adequate space.

SuDS Maintenance

The LLFA has requested a SuDS condition which requires the applicant to submit details of their SuDS maintenance plans prior to development commencing. This is satisfactory from my perspective.'

4.14 Severn Trent Water

No objection – subject to the following conditions:

- Submission and approval of foul and surface water drainage plans;
- Implementation of the approved drainage plans;
- Advise that there may be a public sewer located within the site; and
- Advice on the Building Regulations process.

(Officer comment – the final two points are advisory notes and not legitimate planning conditions)

4.15 Environmental Health Officer

Comments as follows:

- We are now in a position to accept the noise assessment [following further noise monitoring by the applicant and the submission of a revised Noise Assessment);
- Further discussion is needed on what planning conditions are required at this outline stage. The conditions will include the requirement for details of the acoustic barrier next to the railway line, and final approval of the masterplan including the location of gardens; and
- Conditions relating to the construction phase will also be needed.

Further detailed comments, including a full list of recommended conditions, are awaited.

4.16 Contaminated Land Officer

Worcestershire Regulatory Services advises the City Council on land contamination issues and provides the following comments:

- The records indicate that the site has been agricultural land for a considerable period of time. A section of railway line runs along the western boundary of the site and has done since the date of the earliest available maps. There is also an area of agricultural buildings occupying part of the site which are proposed for demolition. Agricultural land can often be associated with the use of pesticides, herbicides, fungicides, bactericides, sewage sludge, farm waste disposal and hydrocarbons from farm machinery. Likewise, the buildings may have been used for the storage of these materials and for storage and maintenance of farm machinery and equipment; and
- Given the history of the site there is potential for contamination to be present. It is recommended that planning conditions are applied to any planning permission in order to fully assess the presence of contaminants and mitigate risks where necessary. It is recommended that any investigation includes sample analysis of agricultural soils to include the substances listed above (herbicides, pesticides etc.).

The following planning conditions are recommended:

- Implementation of contamination conditions
- Site characterisation
- Submission of a remediation strategy
- Implementation of approved remediation strategy
- Reporting of unexpected contamination
- Long-term monitoring and maintenance

4.17 Network Rail

Objection – summarised below:

- There appears to be a holding pond near to the railway boundary; and
- Network Rail is willing to remove the objection providing that the applicant confirms that the holding pond is at least 20 metres away from the railway boundary.

4.18 Stroud District Council

Comments as follows:

- The site is located wholly within Gloucester City's administrative area. Adjacent land in the control of the applicant is located within Stroud District. A large area, either including the site and/or adjacent land, has previously been promoted through the planning system as follows:

- As omission sites during preparation of the Stroud Local Plan in 2005;
 - As part of potential areas of search including in the draft Regional Spatial Strategy for the South West Proposed Changes 2008;
 - Through the Council's Strategic Land Available Assessment 2011;
 - As a potential area of search at the preferred strategy stage in the development of the newly adopted Stroud Local Plan 2011/12;
 - As an omission site at the Examination stage of the newly adopted Stroud Local Plan 2015; and
 - Through the Council's current Strategic Land Available Assessment 2016
- Development of the site would extend Gloucester beyond the well-established boundaries of the Bristol – Birmingham main railway line to the west and Grange Road to the north into open countryside without clear defensible boundaries before Naas Lane and the M5 to the south are reached. It is therefore important to see development of the site as opening up a strategic scale of development to the south of Gloucester;
 - The proper place for considering strategic scale of development is through the Local Plan process. The City Council is jointly preparing a Joint Core Strategy which is seeking to meet the future needs of the whole area to 2031. The draft Plan does not allocate strategic housing sites in this location. However, the plan is currently at examination and the Inspector is considering such matters as housing need and the distribution of housing provision, including examining the future role of strategic sites in and around Gloucester;
 - At the current time, the justification for development of the application site depends primarily upon the outcome of the JCS examination process – whether further land beyond the boundaries of the urban area is required to meet the needs arising from Gloucester City and how any additional land should be identified – through an allocation in the JCS and/or through a future Local Plan review;
 - Within Stroud District, a new Local Plan has been adopted which does not allocate adjacent land at Whaddon for strategic development to meet needs arising from within the District for the period to 2031. In terms of any unmet needs from adjoining districts, the Stroud Local Plan states that these will be considered, including through an early review of the Local Plan, commencing within five years and by December 2019 at the latest; and
 - This Council is committed to working with Gloucester City and the JCS authorities to identify the most sustainable sites for future development to meet identified needs.

4.19 Brookthorpe and Whaddon Parish Council

Strongly objects to the application on the following grounds:

- **‘Sustainability** – there are no new employment prospects in the local area. Local schools, doctors and dentist surgeries are reported to be at full capacity. There are no shopping or leisure facilities within easy walking distance of the proposed site. There is no public transport operating in this part of Grange Road ensuring that the inhabitants would be reliant on their own private cars;
- **Highways** – the proposed development would have an extremely adverse effect on the surrounding road network. The A1473 is very close to capacity especially at the St. Barnabas roundabout. Building already underway at Hunts Grove and other developments along the A38 corridor are not yet complete and may well impact further on congestion. Grange Road itself is classed as a lane with footpath only on one side of the road. It already has a very busy bottleneck, just to the East of the site, when the carriageway turns into single track, as it enters a traffic light controlled tunnel and goes under the railway bridge. There appears no way or willingness to ease the situation at either location in the near future;
- **Flooding** – this area is extremely prone to flooding, and although work has been done to elevate the problem, these fields soak up an immense amount of water, that would otherwise cause flooding in this area of Grange Road. It is unlikely, that even with the balancing ponds suggested, that the current infrastructure could cope with the added surface water;
- **Economic** – this proposal would result in the loss of agricultural land and well as having an immense negative result on the landscape and views to the AONB enjoyed by local residents; and
- **Conclusion** – the Parish Council feels that this area could not cope with the negative effects outlined above caused by the building of 250 homes at this site.’

5.0 PUBLICITY AND REPRESENTATIONS

- 5.1 The application has been publicised by way of press notice and the display of several site notices. In addition, 27 neighbouring properties were directly notified of the applications in writing. Following the receipt of new and updated information from the applicant, a further round of consultation was undertaken. Adjacent properties were again notified and notifications were also sent to everyone who had previously commented on the application.
- 5.2 At the time of writing this report, a total of 178 objections and 2 letters of support have been received. In addition, an online petition of 987 signatures against the application has been submitted.
- 5.3 These representations are summarised below.

TUFFLEY MATTERS

- 5.4 “Tuffley Matters” is a local community action group set up by a number of local residents who oppose the proposed development. The group is said to have almost 700 members. Tuffley Matters have submitted representations against the application and their concerns are summarised below:

Overview

- Local infrastructure is not capable of supporting a possible extra 500 vehicles and 965 people.

Highway concerns

- Grange Road is essentially a country lane with single pavement, no cycle path and no bus service;
- The road is used as a shortcut by local people;
- Concerns about the capacity of the roads and congestion; traffic congestion on Stroud Road and St. Barnabas roundabout at peak times. How will this be dealt with?
- St. Barnabas roundabout is at capacity and the Highway Authority do not have a viable plan to improve it;
- Questions the accuracy of the applicant’s traffic counts; believes the equipment was broken;
- Refers to the accident record on local roads including a fatality in 2014;
- The railway bridge on Grange Road is a “pinch point”;
- Only one parking space is proposed per house which is insufficient; concerns about a lack of parking; increased on-road parking;
- Impact of construction traffic;
- The site does not have good access to local facilities and amenities and there will be reliance on the private car;
- Concerns about the cumulative traffic impact with other developments in the area that have or are coming forward.

Public transport

- No regular bus service on Grange Road because of the railway bridge;
- Nearest bus services are No. 9 (a 9 minute walk); No. 10 (10 minutes); and No. 63 (9 minutes). These are too far for people to walk with shopping bags, children, pushchairs etc.
- School buses at St. Peters High add to traffic at peak times.

Cycling

- No cycle path on Grange Road;

- Access to employment at Waterwells by bicycle is not good because of the distance and steep incline.

Schools

- Local schools are near capacity;
- Pedestrian access for children walking to school is not good.

Amenities

- The nearest shop is Tesco Express on Grange Road. If people want to shop in the area they have to go by car;
- There is only one doctors surgery in the area and it is over capacity;
- A lack of leisure facilities and shops in the area.

Flood risk and drainage

- The site is liable to serious flooding; site has a long history of flooding (photographs taken during flood events are provided); refers to the significant flood events in 2007 and 2012;
- The geology of the site is mudstone and blue lias;
- Concerns that the development will increase flood risk; concerns about flooding on Grange Road;
- Concerns about the effectiveness of the proposed drainage system and balancing ponds if not properly managed;
- Will the proposed drainage system be effective in 15 years' time?
- Impact of "urban creep", which will increase impermeable areas.

Landscape impact, design and layout

- Loss of views;
- Landscape impact;
- The site is an Area of Outstanding Natural Beauty;
- The site currently provides a green buffer;
- The density of the housing is high at 40 homes/ha;
- Will 40% affordable housing be provided as required by the Council?
- Where will the affordable housing be provided and in what quantity?
- There are insufficient details of the design of the proposed homes;
- Will the height of the houses be controlled?

- The three storey apartment blocks will intrude on the landscape; they will dominate the skyline;
- Drawings showing the impact of the apartments need to be provided;
- Can the applicant build a recreation area on the south part of the site which is designated a Landscape Conservation Area?
- Queries the size of the gardens;
- Unsure whether the garage sizes will be large enough to park a car.

Environmental impacts

- There is wildlife on the site including in the hedgerows; impact on local wildlife; reports of bats occupying the farm building;
- The site once contained a farmhouse and is of archaeological interest; the 17th Century barn on the site has archaeological value;
- Loss of agricultural land.

Local Plan Policy

- The JCS and City Plan have not been finalised and this should not be an excuse to pass the application;
- Stroud District Council has a five year housing land supply;
- The Local Plan process rejected the site in 2005 because of the level of opposition to it in relation to the loss of a greenfield site; impact on local services; infrastructure; accessibility; traffic impact; the lack of need for new housing and impact on views to and from Robinswood Hill;
- The surrounding fields do not feature in the new Stroud Local Plan;
- The proposal would intrude into Stroud District;
- The site falls outside the remit of the JCS;
- The Council's Strategic Assessment of Land Availability gives the site a capacity of 198 homes at a density of 35 homes/ha; that it has fair to poor access to public transport; that it is a greenfield site not well located to the main road network; and that St. Barnabas roundabout is identified as being very congested in JCS highway capacity;
- Concerns that approval of the application would set a precedent that would lead to the development of the surrounding land, which is being promoted by Origin 3;
- Concerns that the applicant has been in improper contact with the JCS Inspector and that this has led to the Inspector referring to the application site in her interim JCS report.

Section 106 contributions

- Any payments from the developers will not offset the loss of the site as a green “buffer”; commuted sums are rarely spent

Other matters

- Concerns that the applicant controls the land to the east and it is unclear what their intentions are for that land;
- There are other more suitable sites that should be built on first.

Richard Graham, MP

5.5 Objects to the application on the following grounds:

- **Overview** – the proposal is universally unpopular, too big, would strain local infrastructure and would set a precedent for further applications in neighbouring Stroud District;
- **Schools** – nearby primary schools are at full capacity. These include Tuffley Primary (210 pupils, average class size of 23); Grange Primary School (311, 23); Harewood Junior School (298, 24); and Harewood Infant (224, 28). The proposed development would increase classroom sizes to 28, 28, 31 and 32 respectively (assuming one child per house between the ages of 4 and 11 years);
- St. Peters High School, Beauford Academy, Crypt and Ribston would also struggle to absorb so many pupils;
- With the exception of Tuffley Primary, all schools require significant walks or car journeys. The bus service is poor. Crossing underneath the railway bridge is dangerous. Lack of cycle lanes. All the schools have a shortage of parking/dropping off space;
- **Healthcare** – there is a shortage of GP and healthcare facilities in the area. An increased population will make appointments harder to get;
- **Highways** – the site is next to the Grange Road railway bridge, a well-known local “bottle-neck”. Local traffic has already increased. There are often long tail backs on the local roads. A recent newspaper report cited 87% of all journeys in Tuffley are by car. The applicant’s proposal for one car per home is optimistic and will increase congestion, journey times and air pollution;
- **Future development** – further development to the south of Grange Road and west of Whaddon would only intensify infrastructure issues. Origin 3 (on behalf of Taylor Wimpey) envisages 2,750 homes from the south of Tuffley to Naas Lane in their submissions to the JCS. The application is therefore only the start of the proposals;
- **Section 106 funding** – this and Council Tax funding could be used to mitigate some pressure, but road and GP infrastructure would be hard to resolve;

- **Flood risk** – Grange Road flooded badly in 2007 and 2012. Whilst prevention measures have since been introduced, there is concern that the proposal will increase run-off, funnelling excess water to Whaddon Brook. It is suggested that the site has a high water table. The Flood Risk Assessment fails to take account of urban creep. It is unclear as to who would maintain the proposed flood mitigation; and
- **Conclusion** – the site was rejected by the Local Plan process in 2006 owing to loss of green field; impact on local services and infrastructure; accessibility; traffic generation; lack of need for new housing; and impact on views to and from Robinswood Hill. These points remain valid and are more valid today because of the impacts of other more recent developments elsewhere. The MP objects strongly to the proposal for the reasons cited in their objection.

OBJECTIONS

5.6 The Local Planning Authority has received 178 objections, which collectively raise the following concerns:

Traffic and highway safety impacts

- Traffic congestion; the local road network does not have the capacity to cope with the extra traffic generated by the proposal;
- There is already too much traffic on the roads;
- The development would worsen congestion on St. Barnabas roundabout;
- Extra traffic will be dangerous;
- Grange Road is subject to high speed traffic;
- Many children use this route to go to school;
- The roads have become more dangerous since the opening of the Tesco store on Grange Road (to the west of the site);
- Grange Road is already a “rat run”;
- Local pavements are narrow;
- The railway bridge is single file carriageway and a “bottle neck”;
- The footway underneath the railway bridge is not wide enough;
- The accuracy of the traffic surveys is questioned because the cabling equipment was damaged;
- Impacts on cyclists;
- The applicant’s one car policy is unrealistic and unenforceable;
- Insufficient parking; increased on-street parking;
- Impact on maintenance of the roads;
- Where will construction workers park?

- Mud on the highway during construction.

Drainage

- The site is prone to very serious flooding (including in 2007 and 2012);
- The site acts as a soakaway;
- The proposal will increase flooding elsewhere including flooding of adjacent houses;
- Insufficient foul and surface water drainage infrastructure;
- The proposed SUDS scheme will not work;
- Local knowledge on flooding of the area should not be ignored.

Sustainability

- Insufficient infrastructure to accommodate the development;
- There are not enough amenities in the area such as shops, schools, doctors surgeries, dentists; healthcare; and leisure facilities;
- Local schools are already at capacity;
- St. Peters High School should be discounted because it is not coordinated by the Local Education Authority;
- The site is not close enough to bus routes; limited public transport;
- Brownfield sites should be built on rather than greenfield land;
- There are better alternative sites;
- Empty and unused properties should be used instead;
- There are already enough homes; the area has had enough housing;
- Employment opportunities in the area are limited;
- Approval would set a precedent for further development in this area;
- The site was rejected by the Council in 2005 on grounds of loss of greenfield site; impact on local services and infrastructure; accessibility; traffic generation; the lack of need for new housing; and impact on views to and from Robinswood Hill. Nothing has changed;
- The site was rejected as being unsuitable by the Council's previous Strategic Assessment of Land Availability on grounds of poor accessibility; lack of employment links and the unsuitability of the local road network including St. Barnabas roundabout;
- It was previously understood that the land would not be built on;
- The site is not identified in the Joint Core Strategy;
- The proposal is contrary to the JCS and Stroud Local Plan;
- The proposal is contrary to the NPPF;

- The planning status of the site is unclear;
- Supports the objection submitted by the MP;
- The screening of the proposal under the Environmental Impact Assessment regulations should have taken into account adjoining land.

Urban design

- Unclear what the house sizes will be;
- Insufficient recreation and planting areas within the layout;
- Insufficient open space with a density of 40 homes/hectare;
- Insufficient environmental enhancement within the design;
- No dedicated walkways linking with existing public footpaths;
- The houses are out of keeping with the area;
- Who will clean and maintain the alleyways?
- Overbearing and adverse impact on existing houses;
- Concerned about the visual impact of 3 storey housing;
- Overdevelopment of the site;
- Overbearing and overshadowing of property;
- The flats in the north west corner of the site are crammed in; they do not have gardens or sufficient parking;
- The blocks of flats will be visually over-dominant; the flats are too high in relation to nearby houses; further drawings are required to demonstrate the impact; the flats will block neighbour views;
- Three storey apartments will be out of character with the area.

Environmental concerns

- Adverse impact on ecology and damage to wildlife;
- Increased air pollution;
- Disturbance such as dust and noise;
- Light pollution;
- Increased car emissions;
- Impact on climate change;
- Properties backing onto the railway will be subject to significant noise;
- Noise from road traffic;
- Health threats from the balancing ponds;
- The SUDS ponds will be a nuisance because of insects and odour;
- Who would control and manage the balancing ponds?

- Loss of another farm.

Landscape impacts

- Loss of valuable countryside and greenfield land;
- Loss of greenbelt;
- Negative impact on the environment; loss of trees;
- Loss of important views;
- Impact on the natural beauty of the area;
- Loss of views of the Cotswolds;
- Impact on views of Robinswood Hill;
- Loss of agricultural land;
- The site is an important green buffer to the city;
- Loss of amenity value;
- The development is out of keeping. There is no development on this side of Grange Road;
- The south part of the site is a Landscape Conservation Area. How can it be used for recreation?

Other issues

- Is the land classified as agricultural?
- Devaluation of local property;
- Policing of the area;
- Public consultation has not been sufficient.

SUPPORT

5.7 Two letters in support of the application have been received:

- Gloucester needs more houses;
- The site provides an ideal opportunity for Gloucester to use this land for more homes;
- There is 1% risk of flooding since 2007;
- Existing housing in the area was built on farm land;
- New pupils will be welcomed by academy schools;
- GPs do not need to consider how they will be support the new homes and this is a national problem.

OTHER COMMENTS

5.8 A letter has been received providing the following comments:

- It might be a good idea to build a footpath and bridge from Bateman Close into Grange Road to give easier access to the shops and bus route in Robert Raikes Avenue.

ONLINE PETITION

5.9 An outline petition created by Tuffley Matters has been submitted. The petition is against the proposal. It reports the proposed development as being for up to 300 homes (officer comment – this is factually incorrect as the proposal is for up to 250 homes). At the time of writing this report, the petition had **987** signatures. The petition outlines the following concerns:

- Flooding – the site is a flood plain and is vital to prevent the type of flooding seen in 2007 and 2012. There is a huge risk of any extra surface water causing a big problem;
- Traffic and congestion – Tuffley is already struggling with traffic and congestion. The development is restricted by a railway bridge that cannot be expanded and on any given morning residents will already be queuing. Stroud Road from St. Barnabas is usually backed up to St. Peters High School in morning traffic. The developers proposed a one car policy for occupants of the new development which is not a viable solution. Before long we will have even greater congestion;
- Schools and local services – there are no plans to look at additional school options. Residents will be aware of the number of local children not getting their preferred local school. There is also a huge strain on surgeries, shops, leisure facilities, other local services and jobs;
- Public transport – there are no plans to even discuss public transport until the site is 75% occupied. Even then the only viable bus route is onto Stroud Road into an already well know traffic hotspot; and
- Impact on landscape and natural beauty – there are walks and views here that are enjoyed by people near and far. The land has not been built on for centuries and has historic value. There is an abundance of local wildlife in the fields and hedgerows. We have little “green space” left in the City and it would be a tragedy to lose it. There are also areas of archaeological interest at the site.

5.10 The online petition can be viewed in full at the following link:-

<https://www.change.org/p/gloucester-city-council-tuffley-matters-use-your-voice-to-stop-developers-ruining-our-community>

5.4 The full content of all correspondence on this application can be inspected at Herbert Warehouse, The Docks, Gloucester, or via the following link, prior to the Committee meeting:

<http://planningdocs.gloucester.gov.uk/default.aspx?custref=16/00165/OUT>

6.0 **OFFICER OPINION**

Legislative background

6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the Local Planning Authority to determine planning applications in accordance with the Development Plan, unless material considerations indicate otherwise.

6.2 Section 70(2) of the Town and Country Planning Act 1990 (as amended) states that in dealing with a planning application, the Local Planning Authority should have regard to the following:

- a) the provisions of the development plan, so far as material to the application;
- b) any local finance considerations, so far as material to the application; and
- c) any other material considerations.

6.3 Members are advised that the main issues relevant to consideration of this planning application are as follows:

- Housing supply
- Transport sustainability
- Affordable housing
- Infrastructure
- Economic benefit
- Access and parking
- Landscape impact
- Loss of agricultural land
- Impact on Heritage Assets
- Archaeology
- Urban design
- Public Open Space
- Residential amenity
- Flood risk and Drainage
- Ecology
- Other issues that have been raised during the consultation period
- Local finance considerations
- Planning obligations
- Conditions

Housing supply

6.4 The NPPF states that: '*Housing applications should be considered in the context of the presumption in favour of sustainable development.*' (par. 49).

- 6.5 The NPPF requires that local authorities should be able to demonstrate a five year supply of housing land plus a buffer (par. 47). For Gloucester, the buffer is 5% because of its past record of housing delivery (local authorities with persistent under delivery are required to provide a 20% buffer).
- 6.6 The Planning Policy team advises that the City Council cannot demonstrate a five year supply of housing plus 5% buffer. Factors include the fact that the housing need for the JCS is still subject to debate with the JCS Inspector's Interim Report recommending that the objectively assessed housing need for the JCS is uplifted by 5% from 33,500 new homes to 35,175 homes. Moreover, the delivery of housing through the JCS is reliant on strategic housing sites coming forward in Greenbelt land. The JCS is some months away from adoption and this approach has not been ratified at this time. The City Council's Development Plan dates back to 1983 and it does not have an up-to-date Local Plan that commits new housing sites coming forward.
- 6.7 Policy 49 of the NPPF states that: '*Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.*'
- 6.8 Members are advised that the policies contained in the statutory 1983 Local Plan are out-of-date. Policies contained in the 2002 Local Plan, which the Council adopted for development control purposes, can only be given limited weight for the reasons explained in paragraph 3.17 of this report. Irrespective, housing supply policies are out-of-date because the Council cannot demonstrate a five year supply of housing land.
- 6.9 Paragraph 14 of the NPPF clearly states that:
- 'Where the development plan is absent, silent or relevant policies are out-of-date [officer's emphasis], local planning authorities should grant permission unless:*
- *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits [officer's emphasis], when assessed against the policies in this Framework taken as a whole; or*
 - *specific policies in this Framework indicate development should be restricted.'*
- 6.10 In the absence of operational housing policies, the Council is unable to apply a "brownfield first" approach to housing sites as otherwise argued by many local residents who believe that other sites should be built on first before the application site is considered.
- 6.11 The fact that the Council cannot demonstrate a five year supply of housing land should be given significant weight when the application is considered in the round. It is noteworthy that the site already contributes to the Council's housing supply figures, but even then it is unable to demonstrate five years of deliverable housing land plus 5% buffer.

- 6.12 The JCS Inspector refers to the application site in their Interim Report dated 26 May 2016. The Inspector comments that the site '*...lies within the JCS area and is being considered for allocation in the Gloucester City Plan, having already been counted in the City's capacity figures.*' (par. 84). The Inspector goes on to suggest that '*...as part of the larger Brookthorpe/Whaddon site [outside the JCS area], it should be brought forward for allocation in the JCS, thereby providing more choice, flexibility and certainty in meeting the five year housing land supply.*' Whilst the City Council has rejected the notion of a strategic housing allocation here (which includes substantial land outside the administrative area of Gloucester City in Stroud District), the Inspector's comments indicate that they are supportive of the principle of development of the application site for housing.
- 6.13 Members are advised that the Planning Policy Team is supportive of the application site being considered for residential development
- 6.14 It is considered that there are no specific policies in the NPPF that indicate that development should be restricted. Therefore, in accordance with paragraph 14 of the NPPF, Members are advised that planning permission should **only be refused** where any adverse impacts would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole. Members are advised to have this at the forefront of their minds when they consider the following issues.

Transport sustainability

- 6.15 The planning system seeks to promote development in sustainable locations with good access to shops, services, jobs and public transport. The objective is to reduce car usage so as to reduce congestion on roads, lower pollution levels, and to promote more sustainable and healthy modes of transport such as walking and cycling.
- 6.16 The site is located at the southern edge of the Gloucester in the ward of Tuffley. It is approximately 3 miles (4.8 km) from the City Centre. The surrounding urban area is very largely residential.
- 6.17 The Government's *Manual For Streets* advises that walkable neighbourhoods have a range of facilities within 800 metres but recognise that this is not an upper limit and that walking offers the greatest potential to replace short car trips under 2 km, and cycling for distances less than 5 km.
- 6.18 Section 4.0 of the applicant's Transport Assessment considers the accessibility of the site by all modes of transport including walking, cycling, by bus and by rail. Table 4.1 provides information on the proximity of the site to various facilities and amenities, including:
- Tuffley Primary School – 720 metres
 - Harewood Infant/Junior School – 920 metres
 - Children's nursery – 1,100 metres
 - St. Peters High School & Sixth Form – 900 metres

- Beauford Co-operative Academy – 1,300 metres
- Doctors – 1,500 metres
- Dentist – 900 metres
- Tesco Express – 550 metres
- Premier Stores – 810 metres
- Co-op – 1,200 metres
- Leisure Centre – 1,300 metres
- Library – 1,150 metres
- Worship – 1,100 metres
- Post offices – 1,150 and 1,100 metres
- ATM – 550 metres
- Public house – 810 metres
- Bus stop at Grange Road – 400 metres
- Employment at Waterwells Business Park – 2,500 metres

6.19 The doctors' surgery is the furthest amenity at 1,500 metres, which is an estimated 18 minute walk or 6 minute cycle from the site. Other than the employment at Waterwells Business Park, it should be noted that all the facilities listed above are within the walking and cycling thresholds recommended by *Manual For Streets*.

6.20 In order to facilitate pedestrian access to the site, the application proposes a new pedestrian footway along the frontage of the south side of Grange Road. Two pedestrian island crossings are proposed to link the site to the existing footway on the north side of Grange Road. The Highway Authority identifies the need to improve the pedestrian route underneath the railway bridge by providing improved lighting. A contribution of £6,000 is sought from the applicant and this would be secured by means of a Section 106 legal agreement. Tactile paving along the residential junctions to the opposite side of Grange Road also needs to be provided. These works are on the highway and can be secured by means of a planning condition.

6.21 Insofar as cycling, the topography of the area is reasonably level. Grange Road forms part of an on-carriageway cycle route that links through the residential area of Tuffley and Stroud Road where dedicated cycle lanes exist.

6.22 There are several bus routes that are within a reasonable walking distance from the site along Grange Road, Roberts Raikes Avenue, Stroud Road and Windsor Drive. The bus route that occupants of the development will most likely use is the No. 9 service, which operates from Gurney Avenue within a 5 minute walking distance from the site and which runs every 15 minutes to Gloucester City Centre. The No. 63 service operates from Stroud Road and provides a 30 minute service to Forest Green, Nailsworth and Stroud. The No. 10 service that links Lower Tuffley to Gloucester, Brocksworth and Cheltenham runs every 10 minutes. This is accessed from Windsor Drive and whilst it is a longer walk from the site, it does provide access to a wider choice of destinations for employment, shopping and other trips.

- 6.23 Gloucester Railway Station is located approximately 2.5 miles (4 km) away and can be accessed via public transport or bicycle using the cycle network.
- 6.24 The application is supported by a Travel Plan, which has the aim of reducing solo car usage and promoting more sustainable modes of transport such as walking, cycling and public transport. The NPPF recognises travel plans as a key tool to promote sustainable transport and they are required for all developments that generate significant amounts of movement (par. 36).
- 6.25 The submitted Travel Plan proposes the following measures:
- A Welcome Pack for each householder with information promoting sustainable travel;
 - A Travel Plan notice board with material promoting sustainable travel;
 - Funding of a Travel Plan Co-ordinator;
 - A commitment to promotional events;
 - A monitoring programme to ensure that the Travel Plan is successful.
- 6.26 The applicant says that the Travel Plan will be provided alongside a commitment to provide suitable car and cycle parking within the development; provision of pedestrian links to the existing pedestrian network; and a development layout that promotes sustainable transport in accordance with *Manual for Streets*.
- 6.27 On the advice of the Highway Authority, the applicant has agreed to bring forward some of the initiatives in the Travel Plan that were originally planned to be actioned only after 75% occupation of the site. Moreover, the Travel Plan will target between 5% and 9% reduction in single occupancy vehicles.
- 6.28 The Highway Authority is satisfied that the site is located in an accessible location. There are realistic opportunities for sustainable travel for future occupiers to access local facilities. The Travel Plan is broadly supported and will need to be secured by way of a Section 106 legal agreement.
- 6.29 For the reasons set out above, the proposal is considered acceptable from a transport sustainability point of view, having regard to paragraphs 29, 32, 35 and 36 of the NPPF.
- 6.30 A number of residents have referred to the Council's 2012 *Strategic Housing Land Availability Assessment*, which reported that the site has '*fair to poor access to public transport, services and facilities.*' However, it is considered that this was a brief analysis only and is contradicted by the evidence provided in the application and the professional view of the Highway Authority.

Affordable housing

- 6.31 The applicant has made representations on the policy requirement for affordable housing. They say that the policy requirement should be to provide

20% of the total homes as affordable housing as set out in the latest version of the emerging JCS, rather than 40% as required by the 2002 Local Plan. Their reasoning is that the 2002 Local Plan was never properly tested at Examination and was never adopted. The 40% threshold was formulated on the basis of evidence which is now very old and out-of-date. In contrast, the latest version of Policy SD13 of the JCS sets a requirement for 20% affordable housing in recognition of the weaker housing market in Gloucester. This lower threshold is based on very recent viability evidence commissioned by the three JCS authorities that has been formally tabled to the Inspector. The applicant says that they are committed to providing 20% affordable housing at the site.

- 6.32 Members are advised that the original version of Policy SD13, submitted as part of JCS Submission in November 2014, set out a requirement for 40% affordable housing on larger sites. This policy was modified in February 2016 to 20% affordable housing delivery by way of a note for the Inspector (“EXAM 178”). This followed new viability evidence presented by the *Plan Viability, Community Infrastructure Levy and Affordable Housing Study* (February 2016). That report demonstrated that viability across the JCS area can differ significantly. Therefore, sites of 11 homes or more in Gloucester only require a 20% contribution to ensure that developments remain viable and can be delivered. This threshold assumes the requirement for the developer to pay the relevant Community Infrastructure Levy (“CIL”).
- 6.33 However, the amendment to Policy SD13 made in February 2016 was a draft modification and has not been subject to consultation. It can therefore only be given limited consideration. Indeed, the note provided to the Inspector states that: *‘...this is a draft policy to reflect the findings of the viability study. There still needs to be a review of the level of requirements by the JCS authorities to determine the appropriate balance between affordable housing provision and contributions towards infrastructure needs. There may also be further amendments to this policy following JCS examination sessions on viability, affordable housing and infrastructure.’*
- 6.34 It is pertinent that the Inspector’s Interim Report identifies the need to boost affordable housing across the JCS further. The Inspector suggests that this could be achieved by increasing the overall housing requirement for the JCS area: *‘Consequently, in accordance with the PPG, consideration should be given to increasing the total housing figures in the JCS to help deliver the required number of affordable homes. Increasing the housing requirement by 5% would assist in delivering these much needed affordable homes.’* (par.18 of the Inspector’s Interim Report) How the JCS authorities deal with the issue of increasing affordable housing supply is unclear at this time. But the Inspector’s comments indicate that there is uncertainty at this time around affordable housing delivery and in turn whether a 20% affordable housing requirement for Gloucester will be adopted.
- 6.35 The legal advice to the planning department is that the 40% requirement for affordable housing, as indicated in the original JCS submission in November 2014, should be used ahead of the draft modified policy requirement of 20%.

Members are advised that the fact that a figure of 40% is set by both the 2002 Local Plan and JCS is a coincidence (it is the 40% requirement set by the JCS which is of relevance given that only limited weight can be afforded to the strategic policies in the 2002 Local Plan).

- 6.36 As mentioned, the applicant has given a commitment to providing 20% of the homes across the site as affordable housing. However, given that a 40% policy requirement applies, the applicant will need to demonstrate through a viability appraisal why they can only provide less than 40% affordable housing. The recommendation of this report is therefore subject to the applicant either committing to 40% affordable housing or undertaking a viability appraisal to justify a lesser amount.
- 6.37 If planning permission is granted, the amount, type, size, tenure and location of affordable housing will need to be secured by means of a Section 106 legal agreement in consultation with the Council's Housing Team.

Infrastructure

- 6.38 Many local residents are concerned that there is not enough infrastructure in place in the Tuffley area to serve the proposed housing. Issues around access to services and amenities and transport sustainability have already been dealt with in this report. However, there is concern amongst the public that existing schools and health care in the area do not have enough capacity.
- 6.39 The Local Education Authority ("LEA") has been consulted on the proposal. It has identified the need to create additional capacity at Tuffley Primary School and Beauford Co-operative Academy if the development goes ahead. The LEA confirms that there is sufficient physical space at these schools for the necessary expansion to take place. The LEA seeks commuted sums to support the increased school capacity. Contributions towards pre-school care and local libraries are also required.
- 6.40 The LEA has provided a breakdown of the commuted sums as follows:
- Pre-school – £216,283
 - Primary – £772,438
 - Secondary – £706,800
 - Libraries – £49,000
 - **Total – £1,744,521**
- 6.41 These sums are based on an estimated number of children that will live on the development and cost per child. The figure is based on an amount per qualifying dwelling, and excludes flats and one bedroom properties. The final value of the commuted sums will depend on the number of homes approved at the reserved matters stage. The contributions should be secured by way of a Section 106 legal agreement.
- 6.42 Insofar as the capacity of local doctors' surgeries and dentists, this should be a matter for healthcare providers. Policy ST.14 of the 2002 Local Plan, which

requires developer contributions towards the provision of infrastructure and community services, is out-of-date. Moreover, this policy was never tested at Examination and was never formally adopted. Policies INF5 and INF7 of the emerging JCS, which relates to the delivery of social and community infrastructure, can only be given limited weight at this time for the reasons set out in paragraph 3.13 of this report. Looking further forward, infrastructure requirements resulting from new developments will largely be dealt with in the future by the Community Infrastructure Levy, which the City Council expects to introduce next year.

Economic benefit

- 6.43 The NPPF states that '*... significant weight should be placed on the need to support economic growth through the planning system.*' [par. 19]
- 6.44 The applicant claims that the construction of the development would create 1,075 full time jobs (par. 6.21 of the planning statement). This is based on information provided by the Home Builders Federation, which suggests that the construction of one home per annum generates on average 4.3 direct and indirect jobs. The proposal would therefore have some economic benefit and this adds some weight to the case for granting planning permission.

Access and parking

- 6.45 The application is accompanied by a Transport Assessment and Travel Plan. Discussions have taken place between the Highway Authority and the applicant's highway consultants to address a number of issues and this resulted in the submission of further information by the applicant.
- 6.46 The proposal has been thoroughly examined by the Highway Authority (Gloucestershire County Council). Their detailed comments are summarised in Section 4.1 of this report. The proposed vehicular access to the site would be via a single priority T junction onto the south side of Grange Road. A revised access plan has been submitted which shows extended visibility splays of 2.4 metres by 92 metres in either direction. The access includes the provision of a new footway along the site frontage and two pedestrian crossing refuges and associated signage/lining to accommodate pedestrian access to and from the site. The Highway Authority says that the site access and pedestrian crossing facilities have been subject to independent testing and have not raised any safety issues. Safe and suitable access for all users would be provided.
- 6.47 The Transport Assessment assesses the impact of the proposal on the wider local road network. The study area includes Grange Road, Stroud Road and Cole Avenue. Traffic surveys were undertaken and show that the peak hour for traffic on the highway network is 7:45 to 8:45 hours in the AM period; and 17:15 to 18:15 in the PM period. The applicant's data is comparable with traffic counts undertaken by the Highway Authority.

- 6.48 The application considers junction capacity on the local road network. Modelling of the following junctions has been undertaken:
- Grange Road/Stroud Road Priority T junction
 - St. Barnabas roundabout
 - Epney Road/Tuffley Lane Roundabout
 - Cole Avenue/Epney Road Signalised Crossing
 - Tuffley Lane/Stroud Road
 - Grange Road Railway Bridge
- 6.49 Existing junction capacity assumes a 2015 baseline scenario. The future year baseline scenario is 2021, which coincides with when the development should be complete and has regard to the proposals at Winnycroft Lane (which do not have planning permission yet), Kingsway and Hunts Grove.
- 6.50 The number of expected trip generation is calculated using TRICS data. The assessment has been carried out on the basis of 300 homes (not up to 250 proposed by the application) so that it is robust. The assessment estimates the generation of 141 two way trips in the AM peak hour and 142 two way trips in the PM peak hour.
- 6.51 The assessment goes on to predict the impact of the proposal upon the modelled junctions assuming a 2021 traffic growth scenario and the development being in place. The modelling identifies potential problems at St. Barnabas roundabout and at Grange Road railway bridge:
- St. Barnabas Roundabout – this junction is shown to be operating over capacity with growth traffic alone. When development traffic is added performance at the junction deteriorates further. The development traffic is estimated to increase traffic queues by 12 cars in the AM peak period and by 19 cars in the PM peak;
 - Grange Road Railway Bridge – the bridge is a constraint on the local pedestrian/cycle network and there is a lack of lighting that could discourage walking trips during the hours of darkness.
- 6.52 The Highway Authority reports that the residue cumulative impact on St. Barnabas roundabout would be severe without mitigation as congestion worsens and queues significantly increase. The County Council has secured provisional funding via the Local Enterprise Partnership for £1 million towards a highway improvement scheme for St. Barnabas junction. The cost of the scheme is expected to exceed the provisionally allocated funding and the most recent cost estimate was £1,102,648 (March 2016). The Highway Authority has recommended that a contribution of £102,648 is sought towards the highway improvement scheme to mitigate the impact. The applicant has agreed to pay the contribution which would need to be secured by means of a Section 106 legal agreement.
- 6.53 Turning to the Grange Road railway bridge, the Highway Authority has identified the need for improved lighting to promote opportunities for

sustainable travel. An indicative lighting scheme for the installation of 2 new street lights has been drawn up and the Highway Authority seeks a contribution of £6,000 towards these works. The applicant has agreed to pay this contribution which again would be secured by way of a legal agreement.

- 6.54 In terms of local accidents and collisions, an analysis of records between 2010 and 2015 has been undertaken. The majority of collisions have occurred on the main routes within the study area such as Stroud Road, St. Barnabas, Tuffley Lane and Cole Avenue. The Highway Authority reports that the immediate area has an excellent safety record with no recorded collisions along Grange Road. The available evidence suggests that the collisions are attributed to driver/rider/user behaviour and not as a result of the existing highway infrastructure itself.
- 6.55 The Highway Authority notes a lack of cycling parking at the shopping parades at Holmleigh and Seventh Avenue that would likely discourage cycle trips due to a lack of secure bicycle parking. A contribution of £2,000 is sought to provide cycle stands at both these locations. The applicant has agreed to pay the contribution which would be secured by way of a legal agreement.
- 6.56 Paragraph 32 of the NPPF says that: '*Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.*' The Highway Authority advises that the cumulative impacts of the proposal would not be severe, subject to the identified mitigation. Whilst the significant concerns of local residents about the impact of the proposal on the local road network are understood, they are not supported by technical evidence.
- 6.57 In view of the advice from the Highway Authority, and having regard to Policy TR.31 of the 2002 Local Plan, the proposal is considered acceptable in terms of its transport impacts.

Landscape impact

- 6.58 Preparation of the JCS has been informed by a raft of documentation and evidence. This includes the *Joint Core Strategy Landscape Characterisation Assessment and Sensitivity Analysis*, which provides landscape character and sensitivity analysis around the urban centres of Gloucester, Cheltenham and Tewkesbury. The Landscape Characterisation Assessment ("LCA") has informed the JCS's approach to strategic housing allocations on the edge of Gloucester, Cheltenham and Tewkesbury as well as environmental protection of the land surrounding these urban areas.
- 6.59 The LCA identifies the site as forming part of character area G30 ("South of Tuffley") and has "Medium to low" landscape sensitivity. The commentary on this character area is reproduced below:

'This compartment demonstrates a simplistic pattern of very large, predominantly pastoral fields bound by low and often degraded hedgerows. Tree cover is sparse, confined to the occasional field boundary tree and a

small orchard. The Daniels Brook crosses the site but is not an obvious feature, possibly culverted beneath the ground. The area is notably compartmentalised by the bold linear railway embankment and dramatic line of Poplars to the west; residential development of Tuffley to the north; and the M5 to the south. Despite a loss of landscape features this compartment acts as a green buffer between Gloucester and the AONB. The contrast between urban and rural is further emphasised by the linear railway/Poplar boundary and the bland nature of the landscape compartment.'

Reasons

Highly visible landscape with strong and important visual associations with Robinswood Hill, the AONB, and landscape beyond the M5 in the south

Landscape character degraded by loss of landscape features resulting in simplistic and bland pattern and structure

Good network of public footpaths linking Whaddon, south Tuffley and Waterwells

Tranquility reduced by proximity to M5

Bold, boundary to industrial development at Waterwells – not in keeping with rural landscape character.'

- 6.60 Contrary to the comments of some local people, the site does not form part of the Green Belt (the nearest Green Belt to Gloucester is some distance from the site to the south side of Tewkesbury). Neither is the site within an Area of Outstanding Natural Beauty. The southern part of the site where the Public Open Space is planned is designated a Landscape Conservation Area in the 2002 Local Plan. However, the 2002 Local Plan is not considered to hold significant material weight for the reasons set out in paragraph 3.17 of the report. The weight that can be afforded to the Landscape Conservation Area status of the southern part of the site is therefore limited. Nevertheless, the designation does demonstrate that this part of the site, which is on higher ground than the northern section adjacent Grange Road, is particularly landscape sensitive. This has informed the application proposals which exclude this area from new housing and reserve this part of the site for public open space only.
- 6.61 The Council's Neighbourhood Services Manager ("NSM") has provided advice on the landscape impacts of the proposal. They note that the low ridge across the southern part of the site forms an important view that helps to protect the setting of the southern part of the City. However, given the insensitive management of the landscape and lack of features, the area has little intrinsic value in landscape terms. This is borne out by the LCA which classifies the landscape sensitivity of this area as medium to low. The NSM has no fundamental landscape objection to the proposal, however, the functionality of the ridge on the south side of the site and its role in protecting views of the south is considered imperative.
- 6.62 To this end, the NSM has required further demonstration of the impacts of the proposal from views to the south and south east. The applicant has

responded by providing further landscape analysis to supplement their original Landscape and Visual Appraisal. A number of baseline photographs have been taken of the site from the public footpaths to the south near Naas Farm and from the south east. These are supported by “visualisations” of the proposed development, created from the same viewpoints. The visualisations are based on the amended indicative layout of the scheme provided with the application and assume maximum building heights of 10.5 metres as set out in the Design & Access Statement. Two visualisations are provided for each viewpoint: one assuming the effects of proposed structural planting between 1 and 5 years; and the other between 10 and 15 years.

- 6.63 Viewpoint 1 shows that no housing can be seen on Grange Road at present. After the development is built, and between 1 and 5 years, the roofline of the houses on the southern part of the developable area of the site would be visible. However, after the proposed landscape planting has matured between 10 and 15 years, the roofline of the houses are largely screened. From Viewpoints 2 and 3, the impact of the housing will be more noticeable and after 10 to 15 years, the proposed landscape planting will only partially screen the houses. The NSM considers the impact of the proposal on views from the south (Viewpoint 1) to be satisfactory. However, the impact on views from the south east (Viewpoints 2 and 3) is more of a concern. Viewpoint 2 is of particular interest because it also gives a feel for the view from the Stroud Road when travelling into Gloucester. It shows the south-east corner of the site as skyline development, which is to a degree mitigated by new landscape planting. However, visibility of the development can be significantly reduced if the heights of the buildings are lowered to single or 1.5 storeys, especially in the south eastern corner of the site.
- 6.64 The NMS has suggested that the storey heights of the buildings on the south-east corner of the site can be controlled by condition. This is considered unnecessary because the scale and appearance of the buildings would be controlled at the reserved matters stage. However, it would be prudent to advise the applicant of the need to keep building heights lower at that part of the site by way of an advisory note if planning permission is granted. Similarly, the provision of a landscaping scheme (including structural landscaping) is a matter that would be dealt with at the reserved matters stage.
- 6.65 There are no particular concerns about the impact of the proposal on views of and from Robinswood Hill. When the site is viewed from Robinswood Hill, the development would be seen in the context of the surrounding existing house on Grange Road and to the west and would not be considered detrimental to the landscape setting of the City. It is considered that the proposal would not harm the natural beauty of the Cotswolds Area of Outstanding Natural Beauty.
- 6.66 The concerns of local people about the landscape impact of the proposal are understood. However, given the medium to low sensitivity of the landscape that the site sits within, that development would be prohibited from the higher southern part of the site, and that the impact of the proposal can be lessened through new structural planting and the lowering of buildings on the south and

south eastern part of the site, it is considered that the landscape impacts of the proposed development would neither be significant nor demonstrable.

- 6.67 The proposed development is considered acceptable having regard to paragraph 109 of the NPPF.

Loss of agricultural land

- 6.68 The site is within an area of 'land predominantly in urban use' according to information from Natural England. Adjacent land to the south is zoned as Grade 3, 'Good to Moderate' quality. The proposal would not result in the loss of the best and most versatile graded agricultural land. The proposal is considered acceptable having regard to paragraph 112 of the NPPF.

Impact on Heritage Assets

- 6.69 The site is not within or adjacent a Conservation Area. The site contains no Listed Buildings nor are there any Listed Buildings next to the site. The Conservation Officer notes that the existing agricultural barn, which is located approximately midway along the frontage of the site with Grange Road, has some historic value. It is the last surviving structure belonging to Tuffley Farm and has some local significance. Farm buildings are identified on the 1799 map and the barn is considered to be a non-designated heritage asset.
- 6.70 The barn is constructed in brick with a tiled timber structure roof. There are much more modern additions at the site and rear, which are far less attractive. The buildings are not in good condition. The Conservation Officer would like to see the retention of the barn as part of the proposed development, perhaps as a conversion. However, this is not considered necessary and is not being proposed by the applicant. Moreover, the position of the barn is very close to proposed access to the site and it is unlikely that it can be retained without repositioning the access.
- 6.71 The barn has no legal protection; it is not Listed nor is it suitable for Listing. The Local Planning Authority would not be able to resist its demolition if the applicant submitted a prior notification to require its removal. Under Class B of Part 11 of the Town and Country Planning (General Permitted Development) (England) Order 2015, the Local Planning Authority may only consider the '*...method of demolition and any proposed restoration of the site.*' It would be unable to consider the heritage value of the building.
- 6.72 The applicant has submitted a Heritage Assessment of the barn, which describes and records the building, and assesses its heritage value. The barn is not considered to be significant enough to protect or retain, and the Heritage Assessment acts as a useful record of the barn for future generations. In view of the significance and condition of the barn, it is considered that its removal is acceptable, having regard to paragraphs 135, 136 and 141 of the NPPF. The City Archaeologist has recommended a condition to require that the barn is recorded.

Archaeology

- 6.73 The application is supported by an Archaeological Evaluation report. An archaeological evaluation of the site was undertaken in April 2016. The fieldwork comprised the excavation of 18 trenches. No clear settlement focus was found, however, a concentration of medieval features was found close to Grange Road in the north eastern part of the site. Artefacts included early prehistoric struck flint and pottery, late Iron Age/Roman pottery and medieval pottery. Ridge and furrow cultivation remains were identified across the site.
- 6.74 The City Archaeologist is satisfied with the archaeological evaluation and recommends planning conditions in the event that planning permission is granted. The first condition would secure a programme of archaeological work in accordance with a written scheme of investigation. This will likely require the developer to strip the top layer of the site before construction commences so that archaeological features can be sampled. A second condition would require physical recording of the barn, appropriate archiving and public dissemination of the findings. The City Archaeologist advises that the Heritage Assessment of the barn will be suffice in terms of written description, but elevations and drawings of how the buildings evolved will be required.
- 6.75 Subject to the conditions recommended by the City Archaeologist, it is considered that the proposal is acceptable having regard to Policies BE.32, BE.33, BE34, BE36 and BE.37 of the 2002 Local Plan.

Urban Design

- 6.76 The application is seeking to establish the principle of development of the site for up to 250 homes. The detail of the layout, scale, appearance and landscaping of the development are “reserved matters”, which would be subject to a separate future application (or applications). These matters are not before the Council now. Nevertheless, it is necessary for the Local Planning Authority to consider whether the site can likely accommodate up to 250 homes whilst providing a decent, high quality urban environment.
- 6.77 The applicant was therefore asked to modify their original indicative masterplan to clearly show 250 homes, being the maximum level of development applied for. The indicative masterplan has been subject to a number of iterations to deal with this and a variety of other issues including the relationship of houses with the railway line, the design of the balancing ponds at the front of the site, surveillance of the public open space and urban design considerations.
- 6.78 The latest version of the indicative masterplan (Drawing Number 2988-P-04 Revision L) is considered to successfully deal with these issues and responds to the original concerns of the Urban Design Officer. The layout shows a mix of terrace, semi-detached and detached homes across the site, and a group of apartment blocks in the north-west corner. The housing is set back from Grange Road behind a new roadside hedge to provide a green corridor at the front of the site. There are large areas of open space at either end of the

frontage where the balancing ponds are located. Many of the houses have parking directly in front of them and for the large homes, separate garages and off-street parking is provided.

- 6.79 According to the Drainage Plan, the developable area of the site is 6.3 ha. For a scheme of 250 homes, this equates to a density of 39.7 homes/ha. There is no objection to this density per se, which would help make effective use of land. However, it is necessary for the applicant to demonstrate that this level of development will work in practice from an urban design point of view.
- 6.80 The scale of the indicative masterplan is quite large at 1:1250 and further detail has been sought to examine whether the suggested layout will work. The applicant has provided sketch plans at 1:500 scale that show the indicative layout in finer detail across three different parts of the site. The sketches show a commitment to “keynote” buildings on corners and important vistas; variation in surface materials; proposed parking arrangements including avoidance of parking courtyards; provision of a private drive or “green lane” at the front of the site parallel to Grange Road; street tree planting; and soft landscaping. In the southern part of the site, the sketches demonstrate surveillance of the public open space to be by adjacent houses and part retention of existing hedgerow.
- 6.81 Parking is a necessary structural requirement for any new housing scheme and the applicant has provided detailed parking arrangements across the three parts of the site they sample. The applicant says that the layout has regard to *Manual For Streets*. Neither the County Council Highway Authority nor City Council has up-to-date minimum parking guidelines. The plans assume the following parking standards by type of home:
- One bedroom – 1 space per dwelling
 - Two bedroom – 1.5 spaces per dwelling
 - Three bedroom – 2 spaces per dwelling
 - Four bedroom – 2 spaces per dwelling
 - Five+ bedroom – 3 spaces per dwelling
 - Visitor – 1 space per 5 dwellings
- 6.82 The Highway Authority is satisfied with the above level of provision, other than to require an extra unallocated space for every pair of 2 bedroom houses. If garages are to count towards the overall parking provision then the minimum internal dimensions shall be 3 metres by 6 metres. These issues, along with parking requirements generally, can be dealt with when the layout of the scheme is submitted at the reserved matters stage.
- 6.83 The Police Crime Prevention Design Advisor has commented on the application. They are critical about some aspects of the proposal, particularly with regard to the density of the centre of the site and permeability. Often a balance needs to be struck between design aims such as making effective use of land and ensuring good accessibility, with crime prevention objectives.

These issues would be considered in detail when the layout of the scheme is submitted at the reserved matters stage.

- 6.84 The proposal includes the provision of a 2 metre high acoustic fence on the western boundary of the site to help shield adjacent houses from noise from the railway line. Illustrative sections have been provided that show the acoustic fence set behind a new planting belt which should ensure that it is relatively discreet and not objectionable from a design point of view.
- 6.85 In summary, it is considered that the application satisfactorily demonstrates that the site is likely to be capable of accommodating up to 250 homes whilst ensuring a decent, quality environment, including the provision of acceptable levels of parking. The proposal is considered acceptable having regard to Policies ST.7, BE.1, BE.2 and BE.7 of the 2002 Local Plan.

Public Open Space

- 6.86 Policies OS.2 and OS.3 of the 2002 Local Plan require new housing developments to provide equipped public open space. Policy OS.5 requires payments to the Council to cover the cost of maintenance of the open spaces.
- 6.87 The parameters plan and indicative layout provided with the application show an extensive area of open space on the southern part of the site, coinciding with the area zoned a Landscape Conservation Area in the 2002 Local Plan.
- 6.88 The Council's Landscape Architect provides advice on Public Open Space requirements. They have set out the public open space requirements for the site based on an assumption on the proposed mix of housing (the final housing mix has not provided at this stage because this is an outline application).
- 6.89 The Landscape Architect advises that based on their housing mix assumptions, the site should deliver at least 1.7 ha for formal sport and 0.6 ha for formal play. A Neighbourhood Equipped Area of Play ("NEAP") of at least 1,000 sq. m. should also be provided. The area of undeveloped open space at the southern end of the site is approximately 3 ha (the overall size of the site is 10.8 ha). This exceeds the identified requirement of 2.3 ha¹.
- 6.90 The applicant describes the southern field as forming a small gentle rounded hill and says that it does not lend itself to formal sport (such as a football or rugby pitch). The applicant therefore suggests payment of a commuted sum in lieu of on-site provision of formal sport space. The Landscape Architect has calculated the commuted sum at £895,934.40¹. It is considered that this approach is acceptable in principle.
- 6.91 The applicant has agreed to the provision of a NEAP and has shown this on the east side of the southern field on the indicative masterplan.

¹ Based on an assumed housing mix – the final requirement for open space will vary according to the approved housing mix at the reserved matters stage

- 6.92 The applicant also agrees to provide a commuted sum towards allotments.
- 6.93 The applicant has confirmed that they propose to set up a Management Company to manage and maintain the public open space, balancing ponds and other SUDS features, drainage and common parts of the site.
- 6.94 If planning permission is granted, a Section 106 legal agreement would be required to secure the following:
- Formal play space (0.6 ha¹) to be provided within the site;
 - Provision of a NEAP in an appropriate location within the site;
 - General open space to be provided within the site or off-site by way of financial contributions;
 - Commuted sum towards the provision of formal sport and allotments;
 - Arrangements for the management and maintenance of all public open space and common parts of the site;
 - On-site provision and commuted sums towards off-site provision to be calculated on the basis of a pro rata formula according to the final mix of housing approved at the reserved matters stage.
- 6.95 Details of the planting arrangements and design of the acoustic screen next to the railway line would be secured through the reserved matters and by means of a planning condition.
- 6.96 Subject to these provisions, it is considered that the proposal is acceptable having regard to Policies OS.2, OS.3 and OS.5 of the 2002 Local Plan.

Residential amenity

Impact on the amenity of existing residents

- 6.97 The closest residential neighbours to the site are located to the north side of Grange Road, including properties on Enborne Close, Chislet Way, Whaddon Way and Harwell Close. It is very unlikely that the proposal would demonstrably harm the living conditions of those properties given its residential character and position to the other side of the road. The indicative masterplan shows elevation to elevation distances of over 30 metres between the existing houses alongside Grange Road and the nearest properties on the application site. Normally a minimum of 21 metres separation is considered sufficient and the indicative layout exceeds that requirement by an appreciable margin. There is no reason why minimum elevation to elevation distances cannot be achieved in the final design.
- 6.98 Some residents have expressed concern about the height of the three storey apartment blocks shown in the north-west corner of the site. The final height and design of all buildings are reserved for subsequent approval. Nevertheless, the indicative masterplan shows the apartment blocks largely

set back from Grange Road behind the balancing pond. The elevation to elevation distance between the closest block and the nearest houses on Grange Road is about 28 metres. Again, this is more than sufficient distance. Tuffley Matters and other residents have requested further information about the design of the buildings and their relationship with existing houses. These are matters that would be dealt with at the reserved matters stage.

- 6.99 The houses on the far side of the railway line to the west, including the homes on Vincent Avenue, are physically separated by the railway and there would be over 60 metres between the existing and proposed houses. The proposal would not harm the living conditions of those properties.
- 6.100 Conditions are recommended to require an environmental construction management plan to minimise noise, dust and traffic impacts during construction; and to limit the hours for construction and deliveries.
- 6.101 Subject to these conditions and appropriate control of the position, scale and design of buildings at reserved matters, the proposal is considered acceptable having regard to Policies FRP.10 and BE.21 of the 2002 Local Plan.

Noise impact from the railway line

- 6.102 The railway line is located to the immediate west of the site and travels in a north-south direction. This is the main line between Bristol and Birmingham and it is therefore a busy part of the rail network. The indicative masterplan shows houses and apartments alongside the west boundary of the site, separated by a new planting belt and in the most part behind an access road in front of the houses. The distance between the railway line and closest building is around 13 metres (apartment block 202-207).
- 6.103 The impact of noise from the railway line on the new housing is an important material consideration and it is necessary to ensure that the new residents will have decent living standards. The application is accompanied by a Noise Assessment and Vibration Assessment to examine these issues.
- 6.104 The Environmental Health Officer (“EHO”) has provided advice on the application. They have been working with the applicant’s noise consultants to ensure that the Local Planning Authority has sufficient information on the issue of noise impact from the railway line, but also in relation to noise impact from traffic on Grange Road.
- 6.105 The indicative masterplan has been re-worked so that the houses now face the railway line rather than back onto it. The rationale for this is that it is easier to mitigate noise impacts from inside the houses through enhanced acoustic glazing than it is to protect the amenity of gardens and outdoor areas. The original masterplan showed gardens on the nearside of the railway line and the houses set further back from the west boundary. The revised layout also enables the homes to be built closer to the railway line, therefore, making more effective use of the site.

6.106 The EHO required the applicant to carry out extended and additional noise monitoring at the site to further consider noise impacts from the railway and Grange Road. The applicant subsequently submitted an updated Noise Assessment (dated 27 May 2016). The Noise Assessment reports that maximum noise levels near the railway were relatively high. It makes a number of recommendations to mitigate impacts including enhanced double glazing for units within 35 metres of the railway line; or to place bedrooms in houses within 35 metres of the railway on the opposite side elevation, facing away from the railway track. A 2.0 metre high acoustic screen could also be provided along the railway boundary to further reduce noise levels in the gardens, although the noise report suggests that this is not necessary to make the development acceptable. The EHO has been asked to clarify whether the acoustic fence is fundamentally necessary and their comments are awaited. It is expected that Members will be provided with an update on this issue by the time of the committee meeting. In the meanwhile, it is recommended that the acoustic fence is required if the development proceeds.

6.107 The EHO has considered the updated Noise Assessment and has confirmed that they are now satisfied that the proposal is acceptable. Officers are currently awaiting a detailed list of recommended conditions from the EHO, and it is envisaged that these will include the following:

- Requirement for details of the acoustic fence alongside the railway line and its subsequent implementation;
- Minimum acoustic specification for the bedroom windows within 35 metres and facing the railway line so as to safeguard residents from noise from trains;
- Provision of an Environmental Construction Management Plan; and
- Limit on hours for construction and deliveries.

6.108 The position of buildings and gardens alongside the west boundary of the site next to the railway line would be controlled at the reserved matters stage.

6.109 Subject to suitable conditions, as set out above, the proposal is considered acceptable, having regard to Policy FRP.10 of the Local Plan.

Flood risk and Drainage

6.110 One of the key concerns of local people is that the proposal will compound existing surface water flood problems in the area. It is understood that Grange Road was subject to very serious flooding in 2007 and again in 2012. It is believed that some mitigation works have since been carried out by the Council but flood risk remains a threat.

6.111 The site is on higher ground and falls in a north easterly direction towards Grange Road from a height of 35.3 metres AOD in the south to 26.6 metres AOD in the north next to the road. This is a fall of nearly 9 metres. The site itself is within Flood Zone 1, which is land at least risk of flooding. However, Grange Road to the east of the site, and as far as the junction with Stroud

Road (A4173), is within Flood Zone 3. This is land at high risk of flooding. The brook to the north of the adjacent houses on the north side of Grange Road is identified as being within Flood Zone 2, at medium risk of flooding.

- 6.112 The application is supported by a Flood Risk Assessment and Drainage Strategy. The report seeks to address issues of flood risk, surface water drainage and foul water drainage. The indicative masterplan provided with the application shows two balancing ponds at the lower end of the site next to Grange Road, one at the north-west corner of the site and the other in the north-east corner. There would also be a series of swales. As part of the discussions on the proposal, the applicant has provided a revised drainage plan, surface water plan and drainage calculations.
- 6.113 The LLFA (Gloucestershire County Council) and City Council's Drainage Officer have advised the Council on the flood risk and drainage implications of the proposal. Both have raised a number of technical concerns. Following discussion between the applicant, LLFA and Drainage Officer, the applicant has provided additional information and revised drainage proposals. The LLFA is generally satisfied with this information, but remains concerned as to whether surface water from the site can be effectively discharged to the Severn Trent sewer in Grange Road during a 1 in 30 year rainfall event. The applicant has been asked to provide this information to the LLFA and the point remains unresolved at the time of writing this report.
- 6.114 The Drainage Officer has also reviewed the application, and considered the detailed objections on flood risk and surface water issues raised by Tuffley Matters. The Drainage Officer is satisfied with the revised and additional drainage information by provided by the applicant. The applicant has adequately demonstrated that a suitable drainage scheme incorporating SUDS can be provided as part of the development to address issues of surface water run-off. A condition would be necessary to secure a fully worked up SUDS scheme for the final scheme, including proposals for its future management. The applicant confirms that they wish to set up a Management Company to manage and maintain the SUDS and drainage system.
- 6.115 Having regard to the technical advice from the LLFA and Drainage Officer, the proposal is considered to be acceptable in terms of flood risk and surface water drainage issues. It will be necessary to confirm that surface water can be satisfactorily discharged to the Severn Trent Sewer in Grange Road. Subject to this proviso, the proposal is considered acceptable having regard to Policy FRP.1a and FRP.6 of the 2002 Local Plan.

Ecology

- 6.116 The application is supported by an Ecological Appraisal. A phase 1 habitat survey was undertaken in June 2014. The findings of the report are summarised below:
- The site is dominated by improved grassland and arable lay with native species hedgerows bordering the fields;

- No significant effects on the Cotswold Commons and Beechwoods SAC and NNR, and Severn Estuary SAC, SPA and Ramsar are considered likely as a result of the proposal;
- Habitats present were of limited botanic interest and of limited value to wildlife. There is some limited foraging and nesting potential for birds, and some limited potential habitat for common reptiles, badgers, water voles and bats;
- No evidence of use of the site by protected species;
- The site supports terrestrial habitat of sub optimal suitability for Great Crested Newts and an off-site pond was identified approximately 470 metres from the application site boundary. Great Crested Newts are considered to be reasonably unlikely to be present on the site;
- No evidence of reptiles was observed during the survey. Hedge bottoms and ditches should be cleared using a passive displacement method as outlined in the report;
- Potential suitable habitats for bats and birds are limited. Lighting design should be carefully considered around new and retained hedgerows;
- Recommended that clearance of scrub and woody vegetation is undertaken outside of the bird nesting season (March to August inclusive) or during this time if supervised by an ecologist;
- New hedgerow, scrub and tree planting with buffering coarse margins are recommended to maintain and enhance biodiversity opportunities;
- Additional enhancements could be the installation of a variety of bird boxes on new buildings.

6.117 The design of lighting adjacent new and existing hedgerows should be required by a condition.

6.118 A condition is recommended to prohibit clearance of scrub and woody vegetation outside the bird nesting season, unless the works are supervised by an ecologist.

6.119 It is also recommended that a condition is required to ensure that hedge bottoms and ditches are cleared using a passive displacement method.

6.120 Conditions are recommended to require implementation of a strategy for new hedgerows, scrub and tree planting across the site to promote biodiversity; and a strategy for installing bird boxes on new building.

6.121 In accordance with the Habitats Directive, the proposal should be screened by the Local Planning Authority to establish whether the proposal would have significant effects on the Cotswold Commons and Beechwoods SAC and NNR, and Severn Estuary SAC, SPA and Ramsar. This work is being undertaken and the recommendation of this report is subject to this screening process being completed.

6.122 Subject to the above, the proposal is considered acceptable having to Policies B.7 and B.8 of the 2002 Local Plan.

Other issues that have been raised during the consultation process

6.123 This part of the report deals with other main issues that have been raised during the consultation process but have not been addressed elsewhere.

6.124 Network Rail has objected to the application on grounds of the proximity of the westerly balancing pond to the railway line. Network Rail indicates that they would withdraw the objection if the balancing pond is at least 20 metres from the boundary with the railway. The indicative layout is provided at a large scale and it difficult to be precise as to the distance between the balancing pond and site boundary. The distance appears to be between 19.5 metres and 20 metres. Since the position of the balancing pond is indicative only, it has been suggested to Network Rail that a condition could be imposed to require the balancing pond to be located at least 20 metres from the site boundary next to the railway line. Network Rail's comments on this proposal are currently awaited.

6.125 The applicant confirms that the traffic count equipment was not broken. The Highway Authority has not raised any concerns about the accuracy of the data, which they say is consistent with their own traffic movement records.

6.126 Insofar as concerns that the granting of planning permission would set a precedent for further development in the area, this is incorrect. Members will be aware that each application should be judged on its own individual merits. Similarly, that the applicant may control land to the south and east of the site does not have any bearing on the acceptability of the proposal.

6.127 In response to a concern raised by Tuffley Matters, as far as the Local Planning Authority is concerned, the JCS process is being carried out in full accordance with strict protocols and that there have been no improper meetings between the applicant, their representatives and the Inspector outside formally structured forums.

6.128 Devaluation of property is not a material planning consideration.

6.129 Public consultation has been carried out in accordance with local and national planning requirements.

Local finance considerations

6.130 Section 70(2) of the Town and Country Planning Act 1990 (as amended) states that in dealing with a planning application, the Local Planning Authority should have regard to local finance considerations, insofar as they are material to the application.

6.131 The applicant states the proposal will have a number of direct and indirect financial impacts. The indirect benefits are difficult to quantify and include matters such as the contribution of the future residents of the development to local economic output. Direct financial considerations include Section 106 financial contributions; New Homes Bonus; Council Tax revenue; and construction jobs created.

6.132 It is considered that these financial considerations add to the case for granting planning permission, but are not of themselves pivotal in making the proposed development acceptable.

Planning obligations

6.133 As set out in this report, the proposal requires a range of planning obligations to make the development acceptable. These will need to be secured by way of a Section 106 legal agreement, the detailed requirements of which should be delegated to officers in consultation with One Legal. The planning obligations to be included in the legal agreement are as follows:

1. Provision of affordable housing
2. On-site provision of public open space and NEAP
3. Off-site public open space contributions
4. Management of SUDS, drainage, public open space and common parts of the site
5. Education contributions;
6. Highway contributions.

6.134 The Local Education Authority and Landscape Architect confirm that the contributions towards education and public open space satisfy the “pooling rules” (under the Community Infrastructure Levy regulations, no more than five contributions can be “pooled” for the same project).

Conditions

6.135 Delegated authority is sought for officers to finalise the conditions. In accordance with best practice, this should be done in discussion with the applicant (paragraph 018 of the NPPG).

7.0 CONCLUSION

7.1 The statutory Development Plan for Gloucester remains the 1983 Local Plan, however, it is out-of-date. The Council has adopted the 2002 Local Plan development control purposes; however, it was never subject to formal Examination and was never formally adopted as a Development Plan. The 2002 Local Plan can therefore only be given limited weight.

- 7.2 The Council is unable to demonstrate a five year supply of housing land, which means that local housing policies are out of date. Paragraph 14 of the NPPF is activated, which requires that planning permission is granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits of the proposed development when assessed against the policies in the NPPF taken as a whole.
- 7.3 The principal benefits of the proposal are the delivery of housing for which there is both a need and under supply, and the provision of affordable housing. Other benefits include the provision of green open space and minor improvements to the highway network including improved lighting to the railway bridge tunnel and tactile paving on the north side of Grange Road.
- 7.4 The site is considered a sustainable location for new housing with good access to local services and amenities, many of which are within walking and cycling distance of the site. If the development goes ahead it would be necessary to increase the capacity of the local primary and secondary schools and the applicant has agreed to pay a commuted sum towards this.
- 7.5 Transport information provided by the applicant demonstrates that with mitigation by way of improvements to St. Barnabas roundabout; lighting to the Grange Road railway bridge; and improved cycle parking facilities at local shops; the proposal would not have a “severe” impact on the highway. The proposal would not be detrimental to highway safety.
- 7.6 The site lays within landscape of medium to low sensitivity and would not result in significant or demonstrable harm to the landscape. The proposal would not result in the loss of the best and most versatile agricultural land.
- 7.7 Impacts on heritage (i.e. the historic barn on the site) and archaeology can be managed by way of planning conditions.
- 7.8 The applicant has provided sufficient information to demonstrate that the site can likely accommodate up to 250 homes whilst provided a decent, quality urban environment. Matters of layout, scale, appearance and landscaping are to be dealt with at the reserved matters stage.
- 7.9 The proposal would provide a suitable level of on-site public open space, including a NEAP. Suitable contributions would be secured for off-site public open space. Mechanisms will be put in place by way of a Section 106 legal agreement to ensure that the on-site public open space, SUDS, drainage and common parts of the site are appropriately managed.
- 7.10 The proposal would not harm the living conditions of nearby residents.
- 7.11 The application demonstrates that a suitable drainage system, including SUDS, can be incorporated into the development to satisfy national and local planning policy requirements.

- 7.12 Subject to measures to be secured by conditions, the proposal would not demonstrably and significantly harm wildlife and ecology.
- 7.13 There is no technical evidence to suggest that any adverse impacts resulting from the development will significantly and demonstrably outweigh its benefits. In accordance with paragraph 14 of the National Planning Policy Framework, and having regard to policies in the 2002 Local Plan and emerging JCS insofar as they are relevant, the proposal is acceptable and planning permission should be granted.

8.0 RECOMMENDATIONS OF THE DEVELOPMENT CONTROL MANAGER

8.1 That subject to resolution of the matters listed below and conclusion of a legal agreement under Section 106 of the Town and Country Planning Act 1990 to secure the obligations listed in paragraph 8.2, planning permission is granted with appropriate conditions. Delegated powers to be given to the Development Control Manager to prepare the required conditions and detailed wording of the legal agreement.

- Confirmation that surface water can be satisfactorily discharged into the Severn Trent sewer in Grange Road;
- Confirmation from the EHO as to whether the acoustic fence next to the railway is necessary to make the development acceptable;
- Completion of a screening opinion by the Council to establish whether the proposal would likely have significant effects on the Cotswold Commons and Beechwoods SAC and NNR, and Severn Estuary SAC, SPA and Ramsar; and
- The applicant providing 40% affordable housing or satisfactorily demonstrating why a lesser amount of affordable housing is justified through a viability appraisal

8.2 The planning obligations to be secured by means of an agreement under Section 106 of the Town and Country Planning Act 1990 are:

1. Provision of affordable housing
2. On-site provision and management of public open space
3. On-site provision and management of a NEAP
4. Financial contribution towards off-site public open space including allotments
5. Management of the SUDS, drainage, tree and structural planting, acoustic fence and common parts of the site
6. Financial contribution towards education
7. Financial contributions towards highway improvements to St. Barnabas roundabout; lighting improvements at the Grange Road railway bridge;

and the installation of cycle parking at Holmleigh Parade and Seventh Avenue Shopping Parade

8. Travel Plan

PLANNING CONDITIONS

8.3 It is expected that the conditions will include, but not be limited to, the following:

Standard conditions

1. Standard time implementation conditions for outline permission.
2. Requirement to submit reserved matters relating to the layout, scale, appearance and landscaping of the development.
3. Identification of the approval plans and drawings.

Location of the housing

4. Limit the location of the housing to the area defined as “Residential” and coloured yellow on the approved parameters plan; and to exclude housing outside this area.

Highway conditions

5. Construction of access, prior to other development.
6. Provision of the new footway on the frontage of the site to the south side of Grange Road.
7. Provision of uncontrolled pedestrian crossings to the east and west of the proposed access along Grange Road and footway along Grange Road, prior to occupation.
8. Provision of tactile paving on the north side of Grange Road.
9. Arrangements for the future management and maintenance of the proposed streets to be agreed.
10. Implementation of Travel Plan (revised Travel Plan required).
11. Provision of Construction Method Statement.
12. Provision of fire hydrants.

Environmental protection

13. Requirement for details of the acoustic fence alongside the railway line and its subsequent implementation².
14. Minimum acoustic specification for the bedroom windows within 35 metres of and facing the railway line so as to safeguard residents from noise from trains; or for bedroom windows to face away from the railway line;
15. Provision of an Environmental Construction Management Plan.
16. Limit on hours for construction and deliveries.

Contamination

17. Implementation of contamination conditions
18. Site characterisation
19. Submission of a remediation strategy
20. Implementation of approved remediation strategy
21. Reporting of unexpected contamination
22. Long-term monitoring and maintenance

Drainage

23. Requirement for details of a surface water drainage scheme that incorporate SUDS principles and its subsequent implementation.
24. Requirement for details of a foul drainage scheme and its subsequent implementation.

Archaeology

25. Implementation of a programme of archaeological work in accordance with a written scheme of investigation.
26. The recording of significant elements of the historic built environment (i.e. the agricultural barn) with appropriate archiving and public dissemination of the findings.

Ecology

27. Design of lighting adjacent new and retained hedgerows.

² To be confirmed following further consultation with the Environmental Health Officer

- 28. No clearance of scrub and woody vegetation outside the bird nesting season (March to August inclusive), unless supervised by an ecologist.
- 29. No hedge bottoms and ditches shall be cleared unless using a passive displacement method, details of which shall have first been submitted to and approved in writing by the Local Planning Authority.
- 30. The final scheme to incorporate a strategy for green corridors, the planting of new hedgerows, scrub and trees across the site to promote biodiversity.
- 31. Provision of a strategy for installing bird boxes on new building.

NOTES

Note 1

The applicant/developer is referred to the advice of the Neighbourhood Services Manager in their comments of 15 July 2016. The heights of buildings along the south east side of the site should be kept as low as possible in order to minimize the landscape impact of the development. Single storey bungalows and one and a half storey houses are envisaged in this location.

Statement of Positive and Proactive Engagement

In accordance with the requirements of the National Planning Policy Framework, the Local Planning Authority has worked with the applicant in a positive and proactive manner in seeking solutions to secure sustainable development which will improve the economic, social and environmental wellbeing of the area. In particular, the Local Planning Authority has negotiated issues relating to the transport impacts of the proposal; the level of affordable housing required; education contributions; landscape impacts; impacts on the agricultural barn (a non-designated Heritage Asset); archaeology; the provision of public open space; flood risk and drainage; local finance considerations; and planning obligations.

Decision:

Notes:

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Person to contact: Ed Baker
(Tel: 396835.)

16/00165/OUT

**Land South Of
Grange Road
Gloucester**

Planning Committee 02.08.2016

