

OBJECTION TO PLANNING APPLICATION (14/02212/OUT)
FOR PROPOSED DEVELOPMENT OF UP TO 50 DWELLINGS ON
LAND OFF BASSETT ROAD & EAST END ROAD, BASSETT ROAD, NORTHLEACH

Members of Northleach with Eastington Town Council (NWETC) object to the Outline Planning Application for the proposed residential development of up to 50 dwellings.

1.) AONB considerations

This site lies within the Cotswold Area of Outstanding Natural Beauty (AONB) and is outside the settlement boundary, in open countryside.

The applicant's Design and Access Statement states:

"The site is relatively inconspicuous in landscape terms due to its enclosure by existing dry stone walls and its long standing association with the settlement".

We strongly dispute this statement. This is a prominent site on the east of the town, and there are long-distance views of the site as you approach the town from that side. The surrounding stone wall is a low wall, with no value for screening.

We also note that in the 2012 edition of the Cotswold District Strategic Housing Land Availability Assessment (SHLAA), a constraint on the site is given as:

"Prominent position in AONB."

The National Planning Policy Framework (NPPF) recognises the importance of AONBs and seeks to protect them from unsuitable development.

Paragraphs 115 and 116 of the NPPF state:

"Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty".

“Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest.

Consideration of such applications should include an assessment of the following:

- *The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- *The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and*
- *Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”*

This could be summarised as saying that development in AONBs should be a last resort and only where it would clearly be in the public interest. In NWETC’s opinion, the public interest has not been demonstrated – either at district wide or at a local level.

In June 2014 Cotswold District Council (CDC) announced that the Forward Planning team had calculated that it now has a housing land supply well in excess of five years. The latest housing land supply calculation shows that CDC now has a 359 unit surplus over-and-above the 5 year plus 20% buffer requirement. The report went on to state that the Planning Committee is now in a better position to resist inappropriate and unwelcome proposals for residential development. Since there is adequate housing supply within the District, this casts significant doubts as to the need for this development, which would have a considerable impact on the character of a small market town.

NWETC is also of the view that the proposal constitutes major development and therefore NPPF paragraph 116 applies. The meaning of the term “major” is debatable (and legal precedent describes in the Planning Statement suggests that the definition of major development in the Town and Country Planning (Development Management Procedure) England Order 2010 does not apply). However, we argue that a development that will increase the number of homes in Northleach by 6.7% is a major development for the town.

It is worrying that protected landscapes may not be assuming as much importance as other “sustainability criteria” in potential development site selection. The loss of habitat for wildlife and birds in an AONB should carry significant weight. This Outline Application does not make any attempts to mitigate this loss. The output of the Ecological Appraisal is also questionable, when there have been known sightings of water-voles further downstream to the river and red kites are often seen hunting in that field.

The statement in the Tree Survey accompanying the Outline Application "...nor are any of the trees subject to a Tree Preservation Order" is incorrect. There are seven TPOs on well-established, high-quality trees on the north boundary of the site.

2). Housing density

The size of the proposed development is inappropriately large, representing around 6.7% of the size of the whole town in one single development. Absorbing this many new homes will create infrastructure problems in the town – especially traffic and parking, but also sewage and education which are both at capacity presently – but without leaving adequate time for the town to adjust and address those problems. Feedback from local residents attending a public meeting about the Neighbourhood Plan for Northleach on 20 November 2013 was that no new single development should be more than 20 dwellings.

A high-density development is more suited to an urban location; it is not appropriate for a site on the outskirts of a settlement. In addition, CDC Planning advice states "we are typically receiving schemes showing approx. 16-20 dwellings per hectare on edge of settlement locations". That equates to 33-41 dwellings for a site of this size, versus the current proposed 50. Indeed the number suggested for the land in the July 2014 version of the SHLAA for the western part of the site (N_1A) is 31. Given the setting on the outskirts of the town and visibility on the approach into Northleach, as well as the prominent position in the AONB, a development of this size and density is wholly inappropriate.

The SHLAA June 2014 also states that:

"Limited low density development of high design quality could improve the settlement edge."

The proposal is not a low density scheme suitable for an edge of settlement location where it must blend gently into the surrounding landscape.

3). Affordable Housing

The District Council's policy is to require 50% affordable housing, which would equate to 25 new affordable homes, which NWETC believes is unnecessarily high for Northleach. NWETC commissioned a Housing Needs survey in October 2013 which identified a local need for just 14 families who required and were eligible for affordable homes.

We question the figure provided in the applicant's Affordable Housing Statement for a gross annual need in Northleach sub-area for 44 an extra affordable homes. Northleach sub-area includes Northleach and Riversmeet Wards, an area with roughly twice the number of households (1742) as the parish of Northleach with Eastington (855). The figure of 44 extra affordable homes, while correct, is not directly applicable to Northleach with Eastington, and is being used in a misleading manner.

Cotswold District Housing Needs Assessment (HNA), which is the source of this figure, was based on a 2009 survey that was distributed to a sample of homes (just 148 homes out of a possible 1742 in the sub-area), and the results multiplied up with a resultant loss of accuracy. It is also quite out of date. We argue that the Northleach Housing Needs survey 2013, which was distributed to 100% of homes in Northleach, took place more recently, and had a better response rate, will give the more accurate figure.

NWETC believes that the proposed site should not be viewed in isolation when assessing the affordable housing requirement; cumulative provision by other planned developments in the town should be taken into consideration.

We understand that surveys may underestimate the need; not everyone needing a home may have completed the survey. However, other recently approved developments within Northleach at Wheelwrights (11/05804/FUL) and Fortey House (14/00104/FUL) include 100% affordable housing or shared ownership, which will create 28 new affordable homes in the town over the next couple of years – double the local need identified in the survey. In addition, there is a further application for development at Chequers (13/02211/OUT) that will provide up to 9 homes of which 50% would be affordable.

We also recognise that the affordable housing provision must address the needs of the town until 2031. The local housing need has remained stable over the over the past 8 years; the previous Housing Needs survey commissioned by NWETC in 2008 showing a similar level of need. Developments already in progress look able to meet the current need for affordable housing in Northleach both now and well into the future.

Assuming 100 more houses are built between now and 2031 in addition to the 22 affordable houses planned for the Fortey Road site, 6 under construction at Wheelwrights, and a further 5 at Chequers, some 33 affordable houses will have been provided. This leaves a maximum of 33 required in order to achieve 50% affordable units across all development between now and 2031. Accordingly, out of the 100 houses required, no new development need provide more than 33% affordable housing for the town to meet its commitment.

An oversupply of affordable housing could be detrimental to the sustainability of the town if the town cannot provide sufficient jobs for the people moving into those homes. In the 2011 Census, 71.6% of residents said they go to work in a car or van compared to 46.9% for the district as a whole. This reflects the current lack of employment in the town, which forces residents to look further afield for work. Car ownership rates are likely to be lower for the occupants of affordable housing, which will limit their ability to travel to find work.

A reduction in the affordable housing requirement would reduce the density of the proposed development (which, as already stated, is inappropriately high for an edge of settlement location), and could also release funds to allow the town to better address any infrastructure needs arising from the new development.

4). Level of Traffic and Parking

In feedback to SF Planning, who held a drop-in public consultation on 23 March 2014 about this proposed development (see the Statement of Community Involvement), parking was the concern most often raised by residents. Out of 78 feedback forms received, 55 cited concerns about levels of traffic and parking that would be generated by this development.

The trip generation forecasts in the Transport Statement that have been used to support the Outline Application have been based upon inadequate data and evidence, which is not local, and is out of date (data collected between 01/01/05 and 21/06/09). As a result, it grossly underestimates the impact of traffic, road access, highway safety and parking requirements arising from this development.

With two car spaces provided across 50 dwellings, an increase of 100 cars in the town of Northleach will most certainly be felt adversely. It is likely that a number of households will have more than two cars per dwelling. In the 2011 Census, 11.5% of households reported having 3 or more cars or vans.

The report's conclusion that the majority of vehicles will use East End to access the A40 when travelling out of town is unfounded. The majority of destinations are reached from the traffic lights on the A429 at the west end of the town, which gives access to the north, south and west. The local villages of Hampnett, Turkdean, Withington, Cold Aston, etc., are all accessed via the westerly route. The nearest rail stations at Kemble, Cheltenham, and Moreton are reached via the west exit, as are the towns of Cirencester, Bourton on the Water, Stow on the Wold, and Cheltenham. The motorways, including M5 and M40 north, are also reached via the west exit. Relatively few people commute east towards Oxford.

Local residents could choose to avoid the town centre by using East End to access the bypass along the A40, but the majority don't like to do this. The junction with the A40 at the east of the town is a difficult junction, located on a straight section of road where oncoming cars are travelling at 60mph.

While it is true that East End is 7m wide where it passes Bassett Road, the route towards the town centre soon becomes narrower, and the road is also occupied by parked vehicles, often on both sides. The old houses in the town do not have off-street parking and so residents have to park on the main thoroughfare, creating long sections of single-file traffic (High Pavement and West End are particular problem areas), which result in bottlenecks that impede traffic flow through the town.

The new development would exacerbate this problem by increasing the amount of traffic; at higher levels of traffic we can expect gridlock. Problems have already been experienced: In Winter 2012, a fire engine was unable to get through and in 2013 a gritter was unable to access the West End.

Since the development site is relatively far from the town centre (approx. 0.5 mile or 10 minutes walk), some residents from the new development will drive into the town for local services as opposed to walking, yet with parking facilities within the Market Place already at capacity there will be nowhere for the additional cars to park. For the same reasons, residents are likely to drive to the school, which is located approx. 0.7 mile or 15 minutes walk, but where parking is even more restricted.

The effect of the development would certainly be felt on Bassett Road, which is already used as an overflow for the parking at the Westwoods Centre on a regular basis. The number of available parking spaces on Bassett Road would be substantially reduced by new driveways and access into the new development. Overflow car parking from the Westwoods would then expand into other streets nearby, and could in the worst case block access to the Doctor's surgery for the whole town, which is also located on Bassett Road.



Figure 1: Parking on Bassett Road

NWETC recently surveyed the use of the car parks in the town – as part of work on the Neighbourhood Plan for Northleach – and found:

- The Market Place often has only one or two spaces available and sometimes none at all, especially on market days.
- At the car park next to the school, the survey shows that nearly 60 cars wish to use the 18 available spaces twice a day in term time.
- In order to cope with larger events at the Westwoods Centre, and take parking off Bassett Road and East End, around 30 extra spaces would need to be created.

More at: <http://www.northleach.gov.uk/2014/06/parking-traffic-open-day-22-june-2014/>

Although the access point is not specified in the application, it is shown on Bassett Road in the indicative design. There are 60 houses in the existing Bassett Road/Fallows Road development as well as the Westwoods Centre and doctor's surgery, both of which create substantial amounts of traffic. Adding traffic from a further 50 homes would overload this very small road. An alternative access on East End would reduce the impact on residents of Bassett Road, while not increasing the already high levels of traffic on the road.

We object to the access as currently shown, but when an appropriate proposal comes forward, we would support alternative access point on East End subject to a condition in the approval preventing any change to this.

5). Design approach

Although the submission is in outline only (with all matters reserved), the design and access statement also includes an indicative design and a discussion of likely building materials and style. These design elements are likely to persist when a future house builder submits a revised scheme, even though they have serious shortcomings that need to be addressed in any resubmission of a scheme.

The indicative layout has the following shortcomings:

- a) High density of 50 houses in total (see previous)
- b) An access points shown off Bassett Road (see previous)
- c) Houses facing out on all sides of the development.
- d) Suburban character with no reference to existing local building styles.

In the Statement of Community Involvement, planning officer Martin Perks advised:

“Housing should face out towards the surrounding landscape and not turn its back on it. Front elevations should face towards the river, the river valley and the road to the north.”

To create a street scene, we agree that houses should face onto the road at the north boundary (and, we would argue, the western boundary too, where it would provide odd numbers to complement existing properties on Bassett Road, which are even numbered).

However, it is not clear why this advice was issued in relation to the river and river valley, as it does not reflect the local character and is a style more suited to an urban location rather than a rural one. Gardens facing out would provide a softer edge to the settlement on its western and southern boundaries.

Northleach was originally laid out in mediaeval times in “burgage” plots – consisting of a house on a long, narrow piece of land with a narrow street frontage. On the south side of the town, these burgage plots back onto the river at the KGV Playing Field and Hamilton Meadow. To continue this theme, the houses should back onto the river.

Since the lower part of the development site lies in a flood zone, putting front doors facing the river would also mean that the buildings would be on lower ground and be much closer – if not actually in – the flood zone, leaving them vulnerable to flooding.

Putting front doors on the outside of the development in areas not served by existing roads also increases the length of new roads and pathways needed to reach those front doors, which does not lead to the most effective use of space.

Poor design can be a reason for refusal, according to the NPPF paragraph 64, which states:

“Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.”

6). Noise and disturbance

The applicant’s Environmental Noise Report finds that the noise from the sewage treatment works is unacceptably high at night in parts of the proposed development. Properties on the east and south boundaries of the site would require noise mitigation measures, which include keeping the windows closed and attenuated means of ventilation. Clearly, this is far from ideal.

The sewage plant also causes frequent foul smells, which are especially strong when the wind blows from the north-east, and brings the smell across the town. No possible mitigation measures are mentioned in the Outline Application.

Should a more suitable development proposal come forward, then we would hope to see the sewage treatment works upgraded and modernized to provide sufficient capacity for the new development and to prevent noise and foul smells.

7). Infrastructure

NWETC responded in full to the Infrastructure Delivery Plan (IDP) Interim report – Cotswold District (May 2013) and highlighted the effect on the infrastructure that new developments would cause. Issues raised included education, playgrounds, utilities, flooding, surface water and foul drainage. The play group and primary school are at capacity, and there is no wrap-around child care. There is no equipped play area for older children (6+) and the play area for younger children is very tired. There is no mains gas in Northleach (should a suitable scheme come forward, we would encourage any successful developers to bring gas into the town.) Broadband and mobile reception are poor. Foul drainage across the town is a growing concern with the current system being built for half the population it now serves, at a time when foul drainage requirements were much lower than they are today, and the system is now totally overloaded.

8). Sustainable development

Sustainable development should improve the economic, social and environmental conditions in the area. We argue that the proposal does not meet these requirements for sustainability for the following reasons:

Economic considerations – the development provides housing but no employment and will cement the town’s status as a dormitory town. Businesses in the Market Place will not feel the benefit from an increased number of residents if there is insufficient parking for people to stop and visit the shops there. There is still no superfast broadband in Northleach and only a minority of homes look likely to be addressed by the “Fastershire” scheme later this year; the rest will see no improvement. Given the ICT dependency of modern business, lack of good broadband is a serious drawback for any existing or new businesses wanting to locate in the town, especially home workers.

Social considerations – planning seeks to support “strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations”. It has already been identified that Northleach has considerable affordable housing stock in other developments. The Northleach Housing Needs survey and Neighbourhood Plan consultations have identified a need for a) bungalows and adaptations to suit an ageing population b) larger affordable homes of 4/5 bedrooms (there are currently only three in the town) and c) homes that allowed home workers more flexibility. The Outline Application does not reflect these needs.

Environmental considerations – the proposed development does not protect or enhance our natural, built and historic environment. According to the NPPF, planning policies should encourage the effective use of land by re-using land that has been previously developed. NWETC suggest that the land at the Fire Station in Northleach (N5), which is also owned by the applicant, would be a more suitable site for development as much of the site is underused. As part of the Neighbourhood Plan consultation, this land has been identified as a suitable location for housing, where sensitive development could significantly enhance the appearance of the town. It was also identified as an ideal location for a much-needed car park to serve tourists, as well as visitors to the church and Cotswold Hall,

9) Neighbourhood Plan

NWETC is preparing a Neighbourhood Plan, which will give local people a voice in how and where new development takes place. The Plan aims to address some of the infrastructure issues within the town, and identify local needs so that we can work with developers more productively by providing clear design and development guidelines and a statement of local needs at the outset. This application has come forward before the community and developers can take full advantage of what the Neighbourhood Plan will offer.

Summary

In summary Northleach with Eastington Town Council objects to the Outline Planning application 14/02212/OUT for the following reasons:

- 1) The adverse impact on the natural beauty and biodiversity of a prominent location in the Cotswolds AONB.
- 2) The number and density of proposed houses is excessive and inappropriate for an edge of settlement location.
- 3) The affordable housing requirement is excessive for Northleach, as it does not take into account planned developments that consist of 100% affordable housing.
- 4) The design and layout of proposed houses does not reflect local character and does not improve the appearance of the settlement edge.
- 5) The exacerbation of existing traffic problems including lack of parking provision at the Market Place and school, and increased congestion on the main street.
- 6) Noise and foul smells from the sewage treatment works near the site.
- 7) The negative impact on an already overloaded infrastructure, such as pre-school and primary school education, as well as utilities, especially surface water and foul drainage and sewage treatment.
- 8) The proposal does not enhance the sustainability of Northleach.