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Mr Martin Perks
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Trinity Road
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Wednesday, 05 November 2014

Dear Mr Perks,

Planning Application No. 14/04274/OUT
Outline application for residential development of up to 40 dwellings at
Land Parcel Off Bassett Road And East End Road Bassett Road Northleach Gloucestershire

I write on behalf of members of Northleach with Eastington Town Council ("Town Council") to confirm that the Town Council, on behalf of a large section of the local community, wishes to register its STRONG OBJECTION to the above planning application.

The planning application was discussed at the Town Council meeting on 22nd October, where several members of the public were present, and the decision to object was unanimous.

Previous Application

This application is a resubmission following the refusal by the Planning Committee on 14th August 2014 for an application of up to 50 dwellings on the same parcel of land. The previous application 14/02212/OUT was refused on the grounds that:

"The application site is located within the Cotswolds Area of Outstanding Natural Beauty (AONB) wherein the Council is statutorily required to have regard to the purpose of conserving and enhancing the natural beauty of the landscape. The application site forms part of an attractive river valley that makes a positive contribution to the setting of the town and the landscape and visual quality of the AONB. The proposed scheme by virtue of the density and number of dwellings proposed will result in a form of development that will

appear as a very urban extension of the settlement into the surrounding countryside. The proposal fails to respond sympathetically to the rural character of the site and the wider valley and as such does not take the opportunities available for improving the character and quality of the area. The proposed development will therefore have a detrimental impact on the intrinsic character and appearance of the AONB and the setting of the town contrary to Local Plan Policies 19 and 42 and guidance contained in the National Planning Policy Framework, in particular Paragraphs 17, 56, 64, 109 and 115.”

Comments on Density & Design

The main change in the new planning application is the reduction in houses from 50 to 40, with the assumption that the reduction in density will provide greater scope to deliver the high quality design that is required in an Area of Outstanding Natural Beauty, where the site is on the edge of open countryside and will form the new gateway for the town. A new indicative layout has been submitted alongside the application to show how this might be achieved. Unfortunately, as we will explain, the new indicative layout totally fails to deliver on this aspiration, once again.

Although there has been reduction in the number of houses, there has been an increase in amenity space as well as allocation for a balancing pond, with the result that the density of the scheme remains absurdly high for this location. The density of the original submission, which did not include amenity space or a balancing pond, was about 24 dwellings per hectare. These changes have reduced the gross density of the site down to 19 dwellings per hectare. However, we calculate that the net density of the new layout is now around 32–34 dwellings per hectare (**See Annex A**). Far from being an overall reduction in density, this turns out to be an increase in the density of the built-up area!

The need for a green buffer on a parcel of land that borders open countryside is questionable; in our opinion the amenity space and tree planting are being used as a poor substitute for good design. How will it look in winter when all the leaves have fallen from the trees leaving the houses in plain sight? There is also a green buffer on the north and west edges of the site next to the existing roads, where it would be more appropriate to create a street scene that allows the development to integrate with the existing settlement. This is just bizarre.

The indicative layout once again is in the form of an inappropriate suburban “perimeter block”, where all the houses face outwards. This will not provide a soft edge to allow the development to merge into the surrounding countryside; like the previous proposal it will produce a “hard edge”, which the application says is something to be avoided. The layout is also completely at odds with the medieval heritage of the town with its long “burgage” plot gardens that lead down to and provide a buffer to the environmentally sensitive river corridor.

The applicant has also submitted new drawings showing Cotswold-style terraced houses with gables. While the style of an individual dwelling is more in keeping with the local vernacular, the overall design is unimaginative with uniform house types across the plot rather than a variety of styles as recommended in the Cotswold Design Code. Unfortunately, this style of housing does not suit the proposed outward-looking layout and buffer zones, which further undermines the effectiveness of the overall design. Terraced properties are more appropriate for road-side locations and town

centres; it is rare to find terraced property built directly overlooking open countryside, and none of the plots in the layout border the existing roads. It also becomes difficult to integrate parking at the front of the properties, leading to large “parking ghettos” to the rear.

There is also a new artist’s impression of the so-called “linear park” public space that would be created along the southern boundary, next to the river. The majority of the proposed development site is unimproved grassland; however, the river corridor does have ecological and biodiversity value. The design should take steps to protect such environmentally sensitive areas as the river corridor, where we are told that voles, a species threatened with extinction through loss of habitat, have been sighted. Quiet back gardens would be more likely to confer protection on the river corridor rather than the busy public footpaths and driveways illustrated here.

If the proposed layout becomes a reality it will simply repeat the mistakes of the past; the existing development on Bassett Road was described in the White study some years ago as a “homogeneous block which is clearly a housing estate built all at one time”, even though it had been “carried out with some reference to the Cotswold style”. The report added that “A better introduction is needed for those approaching the town from the east” (Landscape Assessment of Land around Cotswold Settlements, 2000).

We would also like to point out that the advice that “houses should face the floodplain rather than turn its back on it” from the White study has been taken out of context. Asked whether burgage-plot style gardens would be more suitable, the consultant replied that “burgage plot pattern with associated size of garden is not proposed here so just backing modern back garden plots onto the river corridor ... does not seem necessarily like a good idea.” (Personal Communication, Simon White, Cllr Rigby, 2014)

This indicates that burgage-style garden plots would indeed be preferable to small modern gardens, if they could be achieved. The Town Council believes there is scope in this location to create longer gardens leading down to the river, which would make better use of the south-facing elevation and views towards the river, reflect the local heritage and layout, be a more sensitive use of the land in the river corridor, and lower the overall density of the scheme.

The Town Council appreciates that the principle of development is up for decision, and that the details – such as appearance, style and materials – are reserved matters. However, the number of houses is fixed at this stage, and the indicative plans, while not binding, are meant to provide guidance on how the final scheme should look. Developers are aware that future schemes that depart significantly from these arrangements may be frowned upon; and for this reason indicative schemes tend to persist. There is a real fear among the local community that what is contained in the indicative scheme may be what is actually delivered.

The Town Council believes that the new application is not materially improved compared with the previous one. Simply making an over-confident statement that the plan represents good design is not sufficient; the proposal has to actually demonstrate that high quality design can be achieved on the site, and it is our opinion the applicant has failed to do this. Therefore, as the application was refused before, then it must either be refused again, or deferred pending the receipt of improvements to the indicative layout, density, and street scene.

Comments on Access

The present application does not take account of an important point that the Town Council raised in our objection to the previous application about the suitability of the vehicular access point. Bassett Road is already quite congested, as it provides access to some 60 houses, the community centre and doctors' surgery. The ability of Bassett Road to serve a further 40 homes where car ownership will inevitably be high and most occupiers will require two cars for work, is questionable. Photographs in our submission (Annex B) and the applicant's Landscape Report show that Bassett Road often contains many parked cars allowing only single file traffic.

In the Statement of Community involvement, it is noted that "many residents disagreed with the proposed access point off Bassett Road and suggested that East End Road to the north of the development should be the main access point – some went even further to suggest a small roundabout and reducing the speed limit to 30mph would be more appropriate."

It goes on to say "In response to the concerns expressed locally, although the indicative plan still illustrates a potential point of access off Bassett Road ... access is now a reserved matter. This means that when development comes forward through the reserved matters application it doesn't rule out the possibility of using East End Road as opposed to Bassett Road."

In the previous application, 14/02212/OUT, the location of the vehicular access crept in "via the back door" by including a condition of access on East End. However, when the application was considered by the Planning Committee on 13 August 2014, the Highways representative said they did not have any information on the potential for access from East End; it appeared that the only reason for this condition of access on Bassett Road was because it was the only access that Highways had been asked to consider.

Accordingly, the Town Council wrote to the case officer on 21 October to seek reassurance that Highways had been made aware of the potential for access from East End and would carry out a full assessment of its suitability. We received no such reassurance, and see that the condition to restrict access to Bassett Road remains part of the officer's recommendation. We are deeply concerned by this oversight.

The case officer's report now says that "Highway Officers consider that the use of the existing field access onto Bassett Road is the most appropriate access for the development." This decision appears to have been taken without consideration of local evidence; in the absence of the knowledge of congestion on Bassett Road, it would appear to be the more straightforward choice. The access from the main road at East End may be more complicated to implement but there are valid reasons for investigating how it could be achieved.

We also infer that Highways still have not been made aware of the local community's desire to put the access on East End (taking the opportunity to improve traffic control at the entrance to the town at the same time) and the Town Council's more recent request to ensure that the potential for access from East End is considered.

The Town Council asks that the planning application be deferred until the potential for access from East End has been properly assessed by Highways.

Neighbourhood Plan

We would also like to point out that Northleach with Eastington Town Council has made considerable progress with its Neighbourhood Plan, which is being prepared in consultation with the local community and Cotswold District Council.

In October, we published the State of the Parish report (download a copy from www.northleach.gov.uk/ndp), which sets out the opportunities and constraints on development in the town, and summarises local opinion and knowledge as well as the planning policy context.

The State of the Parish report clearly demonstrates that the Town Council and the local community are not “anti-development”. The community has engaged wholeheartedly with the Neighbourhood Plan process, and accepts that the town needs to grow and will benefit from sensitive development, so long as the town’s infrastructure needs are addressed.

As part of this process, which was carried out in conjunction with the consultation on the Local Plan mentioned in the case officer’s report, the community and Town Council did identify the proposed Land Parcel at Bassett Road as having potential for low density housing development, subject to mitigation measures.

The mitigation measures judged to be required were:

- Traffic management, clear site entry and access required directly onto East End (ideally between the two large beech trees onto East End).
- Open Area onto site N1 required.
- Operational upgrading of the sewage treatment works to remove operational noise, foul smell pollution and increase capacity.

[Incidentally, our Ward Councillor Chris Hancock has today received a letter from Thames Water saying that it will be another year before they can make a proper assessment of the capacity of the sewage treatment works, and consider any upgrades. The lack of capacity at the sewage works remains a serious concern.]

The Town Council, by objecting, seeks to ensure that the development is appropriate for the location (i.e. that it is low density and of good design appropriate to its setting in the Cotswold AONB), and the necessary mitigation measures are taken into consideration in the planning process (i.e. now in the case of the vehicular access point).

We are sure that the planning authority often deals with larger and more contentious planning applications than this one. Nevertheless, the proposal for the land at Bassett Road represents the most significant planning application in Northleach for nearly 20 years. This is a very important planning application for the town, and it should be treated with the utmost care and attention to detail in order to secure the best outcome for the local community.

The future of Northleach depends on it.

Affordable Housing

The Town Council believes that the proposed site should not be viewed in isolation when assessing the affordable housing requirement for the town; cumulative provision by other planned developments in the town should be taken into consideration. Viewing sites in isolation will lead to a provision of affordable homes that far exceeds the needs of local people.

There are 6 new affordable homes about to be completed at Wheelwrights (11/05804/FUL) and a further 22 affordable houses currently under construction at the Fortey Road site (14/00104/FUL). Both of these sites provide 100% affordable housing. There is outline planning permission for a further 4 affordable homes at Chequers, out of the 9 provisionally planned. In total 32 affordable houses will become available in the town over the next few years.

The Town Council commissioned a Housing Needs survey in October 2013 in which just 14 families self identified themselves as being in need – and were also eligible for – affordable homes, either now or in the future. The local housing need has remained stable over the over the past 8 years; the previous Housing Needs survey in 2008 showing a similar level of need.

We understand that surveys may underestimate the need; and that the affordable housing provision must address the needs of the local area until 2031. However, the planned provision from developments already in progress is already more than double the local identified need, and that is before the provision of a further 20 affordable homes on the Land at Basset Road.

Where are the jobs for the people moving into those affordable homes? There is no major employer within a 10 mile radius of Northleach. In the 2011 Census, 71.6% of residents in the Parish 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 and local bus services are infrequent and do not operate in the evenings, which will limit their ability to travel to find work.

An oversupply of affordable housing will be highly detrimental to the sustainability of the town if the town cannot provide sufficient jobs for the people moving into those homes. Alternatively, the homes may simply remain unoccupied. Affordable homes in recent major developments in Moreton in Marsh are said to be lying empty because there isn't local demand for them.

While many residents are crying out for more "affordable" housing, they mean homes that they can afford to rent or buy. In fact they may not be eligible for social rented or shared ownership tenure. We would like to avoid the overprovision of affordable homes in a development consisting otherwise mainly of executive four- and five-bedroom dwellings as the developer tries to recoup his investment by building larger homes. This too fails to meet local needs.

We ask Cotswold District to take the cumulative provision of affordable housing in Northleach into account when assessing the affordable housing provision in this application. Under the emerging Local Plan, Northleach is expected to provide roughly 100 new homes between now and 2031. Since 32 affordable homes are already in progress, no more than 33% of new permissions need to be affordable for the town to meet its commitment overall.

A reduction in the affordable housing requirement on this site would also release funds to allow the town to better address any infrastructure needs arising from the new development, such as better traffic management and the construction of a new access point to the development, or possibly a contribution to the upgrade of the sewage works in due course.

Section 106 Contributions

Notwithstanding our objections to the application, we have to make allowance that it may be approved.

In the course of the previous application, The Town Council requested a financial contribution towards community leisure and recreation facilities. The total figure was approximately £59,000 toward the provision of a much-needed children's play area and a multi-use games area. A 20% reduction in dwellings would equate to a revised contribution of approximately £47,250.

The Town Council also wonders who will be required to maintain the open space. It is our experience that land that is in the public domain, but privately owned, does not get well maintained, and therefore a management agreement of some sort will be needed. If the expectation is that the Town Council is to adopt the land, then a maintenance sum equivalent to 20 years costs will be required.

Procedural Matters

We note that the application is to go before the planning committee on 12 November 2014, just one week after the published closing date for submission of comments on 6 November, which seems unnecessarily hasty.

We also found the case officer's report had already been written and published on the CMIS website by 4 November, which is when we became aware of it. This is before the closing date. How can the case officer take the views of the Town Council into consideration when his report has been written before we had submitted the same?

We are also receiving reports from residents that they have been told that their comments cannot be considered because they have come in after the deadline. There is no statutory requirement to ignore comments received after the deadline, and in any case, the published deadline for comments on the Planning Register is 6 November and has not yet passed.

We would like assurance that our comments on the planning application will be made available to members of the planning committee at least three clear days in advance of the meeting. If necessary, consideration of the application should be deferred to a later date.

Annex B

Car parking on Bassett Road

