

Comments for Planning Application 26/00613/OUT

Application Summary

Address: Land To The East Of Nostle Road Nostle Road Northleach Gloucestershire

Proposal: 26/00613/OUT | Outline application for 50 dwellings, plus associated infrastructure and landscaping. All matters reserved except access

Case Officer: Martin Perks

Summary:

Northleach with Eastington Town Council raises no objection to the principle of development of this site which is allocated for residential development in the adopted Cotswold District Local Plan 2011 - 2031. Policy S12 Northleach allocates site N_14B (Land adjoining East End and Nostle Road) with an indicative capacity of 17 dwellings. However, the Council has serious concerns about the current proposal for 50 dwellings, which is not in accordance with the Local Plan and represents an overdevelopment of the site. The proposal substantially exceeds the scale and form envisaged and fails to respond appropriately to the site's constraints, particular in terms of landscape and sewage capacity.

1. Amount of development

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

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

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

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

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

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

The recommendations in the [Northleach Site Assessments SHELAA](#) (2021) are:

Should N14B be developed, the scheme should:

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

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

We note that, based on the applicant's documents, in pre-application advice the Local Planning Authority requested a scheme be developed for the whole site N_14B with an increase in housing numbers in line with changes in national planning policy. This would appear to be a response to the piecemeal approach taken in a previous application, 24/02650/OUT, now withdrawn. However, this advice does not override the landscape constraints, site-specific policy framework, or statutory duties and should not be interpreted as justifying development that exceeds the site's capacity.

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

2. Access and highway safety

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

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

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

3. Housing mix and affordable housing

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

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

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

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

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

4. Landscape and visual impact

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

In the evaluation of landscape sensitivity, the N_14B site assessment states: "Housing development here would only be acceptable if it was carried out to a very high standard to create a more pleasing indented and varied edge to the settlement on this side. [...]. Development should not venture east beyond the settlement edge created to the south by the recently completed development. The east of the parcel could be utilised for community benefit and the enhancement of Green Infrastructure provision."

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

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

5. Flood risk and drainage

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

Residents of nearby properties have reported existing issues, including water rising in their gardens from natural springs and flooding of the roads adjacent to the site. The drainage

gully on the Nostle Road junction has been filled in and water coming down East End / the London Road often discharges into the field opposite. Any development must provide robust, long-term management of surface water and runoff to prevent recurrence of flooding on the site itself and of neighbouring properties and roads.

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

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

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

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

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

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

6. Biodiversity and ecology

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

7. Infrastructure and planning obligations

(a) Space for a playground within the development

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

(b) Creation of a visitor car park

The proposed development of 50 new dwellings on the edge of the town will generate additional demand for parking in the town centre. While the distance of just over half a mile is walkable for some, it is likely that a significant proportion of trips to access local shops and services will be made by private car. This will lead to an intensification of existing on-street parking pressures in the town centre and nearby residential streets.

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

Northleach with Eastington Town Council

03 April 2026