

Planning Statement

Land at Sodbury Road, Wickwar

Bloor Homes South West

February 2022

Turley

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Client

Bloor Homes South West

Our reference

BLOA3039

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1. Introduction

1.1 This Planning Statement has been prepared by **Turley** to accompany an application for planning permission submitted by **Bloor Homes South West Limited** [“Bloor Homes”] for development at **Sodbury Road, Wickwar** within the administrative area of South Gloucestershire Council.

1.2 The application is submitted in Outline form, with all matters reserved for later approval other than main access from Sodbury Road. The description of the proposed development is as follows:

“Outline application (with all matters reserved except for main vehicular access(es) from Sodbury Road) for up to 180 dwellings, a local shop and associated infrastructure”

1.3 This Planning Statement is structured in the following order and is to be read in combination with the other submitted planning application documents:

- The Site and Context;
- Proposed Development;
- Planning Policy Context;
- Planning Assessment;
- Planning Obligations – Draft Heads of Terms; and
- Summary and Conclusions.

2. The Site and Context

Site Location and Context

- 2.1 The site comprises approximately 7.89 hectares of undeveloped land located to the south west of Wickwar. The site lies to the west of Sodbury road, fronting this road at the northern and southern extents, and otherwise lying behind existing built development on the Western side of Sodbury Road. Existing and consented residential development lies opposite the site on the eastern side of Sodbury Road.
- 2.2 Wickwar lies at the north eastern edge of South Gloucestershire approximately 2.5 miles south of Charfield and 3 miles north of the centre of Yate to the south. Two access points into the site are proposed as part of this application both on to Sodbury road. The site adjoins the existing defined settlement boundary at the point of the northern access. The existing development along Sodbury from this point south is not currently within the settlement boundary.
- 2.3 The site comprises several agricultural fields of limited ecological importance and divided by hedgerows and some trees. The site is not within any nationally or locally designated landscape.
- 2.4 There are no public rights of way across the site, and the site is wholly within Flood Zone 1, that with the least vulnerability to flooding. The site is broadly flat with a gently slope down from south east to north west.
- 2.5 There are not any heritage assets within the site. A Grade II* listed building is located circa 440m west of the site and the nearest listed building is a Grade II listed farmhouse 28m north of the site. The southern edge of the Wickwar Conservation area is located circa 330m north of the site.

Relevant Planning History

- 2.6 There is no record of any historic applications on the site, aside from in relation to this proposal. This comprises a request for an EIA Screening Opinion (processed under application ref. P21/030/SCR) submitted in October 2021. The Council confirmed in November 2021 that EIA is not required for these proposals, by issuing a negative Screening Opinion.

Pre Application Public Consultation

- 2.7 Pre-application consultation with the local community has included distribution of over 800 leaflets to make residents aware of the proposals and to invite them to share their views with the project team. A project website was also set up which included the ability to leave online feedback. There was also engagement with the Town Council via email to answer various questions raised in response to information issued.
- 2.8 Further information in response to the comments received during the consultation process are provided in the separate Statement of Community Involvement included with this submission.

3. Proposed Development

3.1 The proposed development comprises a mixed use scheme of up to 180 dwellings with land for a new local shop and associated infrastructure (including new play facilities, and other public open space).

3.2 The full description of the proposed development is:

“Outline application (with all matters reserved except for main vehicular access(es) from Sodbury Road) for up to 180 dwellings, a local shop and associated infrastructure”

3.3 In summary, the proposals seek to provide:

- An extension to the village in a location that is logically related to the existing built form;
- A local shop (of no more than 1,000sqm) to serve the community and provide local retail which is currently missing in the village;
- Two new access points from Sodbury Road at the west of the site; and
- Additional landscaping, green infrastructure and public open space.

3.4 The submitted application is in an ‘outline’ format with all with all matters reserved other than the two primary access junctions. Although full details for the scheme are not provided, a comprehensive illustrative masterplan for the site has been developed to demonstrate that it can suitably accommodate the level of development proposed in a well-designed manner. This is provided with the submission alongside details of key development ‘parameters’ (Heights, Amount, Uses etc.) within the submitted Design and Access Statement. The proposed local shop is also in outline only but consideration has been given to the land required to accommodate such a facility and appropriate allowance has been made to accommodate this use within this area, with the design and specification having regard to input provided by potential operators.

3.5 In addition to this Planning Statement the following documents also accompany the application and provide the information necessary to describe, assess and determine the proposals:

- Application Form, Certificates and CIL Information;
- Location Plan (ref. 1001);
- Illustrative Framework Masterplan (Turley, 3001 rev H)
- Design and Access Statement (Turley Design, February 2022);
- Transport Assessment (Clarkebond, 7/12/21);
- Travel Plan (Clarkebond, 11/2/22);

- Flood Risk Assessment And Drainage Strategy (Clarkebond, 8/10/21);
- Phase 2 Ground Investigation Report (Clarkebond, 8/2/2022)
- Arboricultural Report (Biocensus, September 2021);
- Noise Assessment (Wardell Armstrong, November 2021)
- Landscape and Visual Baseline Assessment (EDP, February 2022):
- Archaeological and Heritage Baseline Assessment (EDP, December 2021);
- Heritage Impact Assessment (EDP, ref. edp6190_r005a);
- Ecological Appraisal (EDP, December 2021);
- Biodiversity Net Gain Calculations (EDP, ref. edp6190_r006a)
- Energy and Sustainability Statement (Briary Energy, September 2021); and
- Statement of Community Involvement (Cratus, December 2021).

4. Planning Policy Context

Overview

- 4.1 The application site is located outside of the Green Belt and is not part of the AONB. Development at Wickwar will help to meet housing needs for South Gloucestershire. This application includes proposals for a new local shop, which would be a key benefit to the village as there is no current retail provision at Wickwar. Additional housing at the settlement will help to support further additional services and facilities at the settlement, to the benefit of the overall sustainability of Wickwar as a place.
- 4.2 The relevant policy position and considerations in respect of the application are considered further under relevant headings below.

The Development Plan

- 4.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that:
- “If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”*
- 4.4 The current ‘Development Plan’ for the site consists of the South Gloucestershire Core Strategy (2006-2027) and the South Gloucestershire Policies, Sites and Places Plan.
- 4.5 Other material considerations include:
- The National Planning Policy Framework (March 2012) (NPPF) and National Planning Practice Guidance (NPPG);
 - Supplementary Planning Documents; and
 - New South Gloucestershire Local Plan.
- 4.6 Whilst the Development Plan is the starting point for making determinations under the Planning Acts, other up to date material considerations are significant.

Core Strategy 2006-2027

- 4.7 The South Gloucestershire Core Strategy 2006-2027 was adopted on 11 December 2013. The strategy sets out the general location for development, its type and scale, as well as various other strategic policies to protect the physical and environmental assets of the area.
- 4.8 Notwithstanding that the Core Strategy remains part of the adopted Development Plan for South Gloucestershire key policies are out of date as in excess of five years have elapsed since this plan was adopted. In particular Policy CS5 which sets the spatial strategy for development within South Gloucestershire is not up to date. This is an important material consideration to the determination of this planning application.

- 4.9 **Policy CS1**, high quality design, states development will only be permitted where the highest possible standards of design and site planning are achieved. The Policy requires development to be of an appropriate scale and design and to be well integrated into the area.
- 4.10 **Policy CS2**, green infrastructure, states that it will be ensured that new green infrastructure is planned, delivered and managed as an integral part of creating sustainable communities and enhancing quality of life. The policy goes on to identify 7 objectives with which proposals should accord.
- 4.11 **Policy CS4a**, presumption in favour of sustainable development, states when considering proposals for sustainable development the Council will take a positive approach and work proactively with applicants to approve sustainable development wherever possible. It is further stated that *“Planning applications that accord with the policies in this Plan will be approved without delay unless material considerations indicate otherwise”*.
- 4.12 **Policy CS5**, location of development, states new development within the open countryside will be strictly limited. However, in accordance with Paragraph 8.32 of the Policies, Sites and Places Plan 2017, this policy will not be considered up to date where the Local Planning Authority cannot demonstrate a housing land supply of at least 5 years.
- 4.13 **Policy CS6**, infrastructure and developer contributions, states that all new development which would add to overall demand and impact on infrastructure should provide measures to mitigate any impact including through the provision of new infrastructure, services and community facilities. Financial contributions will be sought towards to maintenance of provided facilities and to provide facilities off-site where they cannot reasonably be provided within the development site.
- 4.14 **Policy CS8**, improving accessibility, states that priority will be given to providing the users of new development with a range of travel options other than the private car. The Policy goes on to identify how new development proposals which generate significant demand for travel will be more favourably considered the nearer they are located to existing and proposed public transport infrastructure and existing facilities and services. The policy identifies the provision of, and integration of walking, cycling and public transport infrastructure into the local network as a key way to achieve sustainable travel for new developments.
- 4.15 **Policy CS14** sets out the Council’s approach to retail and town centres, it includes a requirement for out of centre retail proposals to be accompanied by a retail impact assessment if the floorspace is over 1,000sqm. The proposed local shop as part of this scheme will not be above this threshold and so no impact assessment has been provided with this submission.
- 4.16 **Policy CS15**, distribution of housing, states how over the plan period, the council aims to secure the delivery of a minimum of 28,355 new homes. The Local Plan acknowledges within Paragraph 10.14 that due to the level of housing required up to 2027, *“increasingly new housing development will have to be on greenfield sites, as there is a declining amount of brownfield land available in sustainable locations”*.

- 4.17 **Policy CS16**, housing density, states that housing development should make efficient use of land to conserve resources and maximise the amount of housing supplied. The Policy continues, stating new development should contribute to:
- The high quality design objectives set out in Policy CS1
 - Improving the mix of housing types in the locality; and
 - Providing adequate levels of public open spaces, semi-private communal open space and private outdoor space.
- 4.18 **Policy CS17**, housing diversity, states new housing development should comprise both market and affordable homes and provide a wide variety of housing types and provide a wide variety of housing type and size.
- 4.19 **Policy CS18**, affordable housing, seeks a provision of 35% affordable housing, unless the developer can demonstrate that the economic viability of the site is affected and as a result that a lower percentage should be provided. In this case other financial contributions will be sought.
- 4.20 **Policy CS24**, green infrastructure, sport and recreation standards, states that new development is required to comply with all local standards of provision in terms of quantity, quality and accessibility. Further to this, provision must be delivered on-site, unless it is demonstrated that partial or full off-site provision or enhancement creates a more acceptable proposal.
- 4.21 **Policy CS34**, aims to deliver the vision for rural areas up to 2027. The vision states that through engagement with rural communities and where environmentally appropriate, new limited development will be provided to meet local needs. Policy CS34 seeks, among other points, to protect the unique and valuable setting provided by the rural areas to the urban areas and other settlements in South Gloucestershire.

The Policies, Sites and Places Plan

- 4.22 The Policies, Sites and Places plan, adopted 8 November 2017, replaces the remaining saved policies of the South Gloucestershire Local Plan 2006 and supplements the adopted Core Strategy by dealing with a range of more detailed Development Management matters.
- 4.23 **Policies PSP1 and PSP2** relate to responding to climate change and high quality design. **Policy PSP1**, Local Distinctiveness, states that proposals will be acceptable where the proposals demonstrate an understanding of, and respond constructively to the buildings and characteristics that make a particularly positive contribution to the distinctiveness of the area / locality.
- 4.24 **Policy PSP2**, Landscape, states that where development proposals would result in harm to the landscape, it must be clearly demonstrated that:
- the proposal results in benefits that outweigh the harm; and

- any harm to the landscape is minimised and mitigated through the form of the development and where reasonable the provision of landscape enhancements.

- 4.24.1 **Policy PSP2** continues, stating that open space provision will be required to be of a high standard of design and appropriate to the use and character of the development and its location. It must be designed to be an integral part of the development but incorporating existing landscape features where appropriate, for the benefit of the proposal.
- 4.25 **Policy PSP8** relates to managing future development, specifically regarding residential amenity. **Policy PSP8** states that development proposals will be acceptable provided that they do not create unacceptable living conditions or have an unacceptable impact on the residential amenity of occupiers of the development or of nearby properties.
- 4.26 **Policies PSP10, PSP11 and PSP16** relate to providing housing and community infrastructure. **Policy PSP10**, active travel routes (ATR), states that existing and proposed ATR will be safeguarded, and where a new or improved ATR is proposed, it shall be designated for use by pedestrians, cyclists and equestrian users. This will be the case unless demonstrated the route is only required for a particular group. In addition to this, new developments will be expected to provide links to existing ATR where appropriate, with the policy going on to provide criteria which new developments must adhere to.
- 4.27 **Policy PSP11**, transport impact management, states where a development generates a demand for travel, it will be considered acceptable where appropriate, safe, accessible, convenient and attractive access is provided. Any new or improved bus stops must meet the councils and national standards and residential and commercial development should be located in accessible locations.
- 4.28 **Policy PSP11** continues, stating where traffic would be generated, it should not contribute to congestion, impact surrounding communities or access routes or harm environmentally sensitive areas. Finally, unobstructed emergency vehicle access should be provided and where the transport impact will be significant, an appropriate Transport Assessment and where necessary a Travel Plan should accompany proposals.
- 4.29 **Policy PSP16**, parking standards, provides the following parking requirements:

Table 4.1: Policies, Sites and Places 2017 Parking Standards

Dwelling Type	Parking Space Provision
1 Bed Dwelling/Flat/Apartment	1
2 Bed Dwelling/Flat/Apartment	1.5
3 Bed Dwelling/Flat/Apartment	2
4 Bed Dwelling/Flat/Apartment	2
5 and 5+ Bed Dwelling/Flat/Apartment	3

- 4.30 **Policy PSP40**, residential development in the countryside, defines the proposed development site as being within open countryside. Paragraph 8.32 of the supporting text states that development of this proposals nature will be strictly limited, in accordance with Policy CS5 of the Core Strategy 2006-2027. However, Paragraph 8.32 goes on to state that “*if a 5 year housing land supply cannot be demonstrated, Policy CS5 in so far as it relates to the supply of housing, will be considered out of date in accordance with the NPPF*”. In pursuance of this, Paragraph 8.32 states “*Where residential development proposals, that do not conform with policy PSP40, are brought forward at times when a 5 year housing land supply cannot be demonstrated, applications will be assessed in accordance with all relevant development plan policies and the National Planning Policy Framework (NPPF, as set out in paragraph 14)*”.
- 4.31 **Policy PSP43**, private amenity space standards, states all new residential units will be expected to have access to private amenity space. The policy outlines that provision should meet or exceed the following:

Table 4.2: Private Amenity Space Standards

Dwelling Size	Minimum Standard (m2)
1 Bedroom Flat	5
2+ Bedroom Flat	5 + private shared communal space
1 Bedroom House	40
2 Bedroom House	50
3 Bedroom House	60
4+ Bedroom House	70

Policies, Sites and Places Plan 2017

Other Material Considerations

National Planning Policy Framework (NPPF)

- 4.32 The revised NPPF was published in July 2021 and sets out the Government’s planning policies for England and how these are expected to be applied.
- 4.33 At the heart of the NPPF is a **presumption in favour of sustainable development**, which should be seen as a golden thread running through both plan-making and decision-taking. Sustainable development includes three elements – economic, social and environmental.
- 4.34 NPPF **Paragraph 8** advises that there are three dimensions to sustainable development:
- An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

- A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations, and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and
- An environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

4.35 **Paragraph 11** identifies the NPPF’s presumption in favour of sustainable development. For decision-taking, this presumption means approving development proposals which accord with the development plan without delay and where the development plan is absent, silent or relevant policies are out-of-date, permission should be granted unless:

- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits; or
- Specific policies within the NPPF indicate development should be restricted.

4.36 **Paragraph 74** is focused around significantly boosting the supply of housing. The Paragraph states that Local Planning Authorities should maintain and update annually a 5 year supply of deliverable sites.

National Planning Practice Guidance

4.37 The National Planning Practice Guidance (NPPG) was published in March 2014 and supports the NPPF and provides guidance on housing and economic development needs and availability assessments, the consideration and determination of planning applications, and various other technical and procedural matters, supporting the overall implementation of the policy contained within the NPPF.

Supplementary Planning Guidance and Documents

4.38 The following supplementary planning guidance and documents are considered to be of relevance to the proposed development and have all be considered as part of this application:

- Revised Landscape Character Assessment SPD, adopted November 2014;
- Residential Parking Standards SPD, adopted December 2013;
- Design Checklist SPD, adopted August 2007;
- Landscape Character Assessment SPD – adopted 2014;
- Affordable Housing and Extra Care SPD – adopted 2014;

- CIL Charging Schedule and CIL and S106 SPD – adopted 2015; and
- Adoptable Highway Specification – adopted 2015.

New South Gloucestershire Local Plan

- 4.39 Work has commenced on the New South Gloucestershire Local Plan, which will replace the Core Strategy and Policies, Sites and Places Plan and cover the period 2018-2036. A consultation was undertaken on initial draft documents (Issues and Approaches) in winter 2020/21. The next stage of consultation on Key Issues is currently pending, with a response deadline for comments on the consultation of 21 March 2022.

Planning Policy Conclusions

- National planning policy within the NPPF requires Local Planning Authorities to apply the presumption in favour of sustainable development when making decisions on planning applications, as part of approaching decision-taking in a positive way to foster the delivery of sustainable development;
- The site is not covered by any specific restrictive designations that would limit development; it is outside of the Green Belt and AONB and is not otherwise part of any designated landscape; and
- As part of the emerging Local Plan, South Gloucestershire will need to identify suitable, sustainable and achievable development locations that are realistically capable of meeting the identified housing needs for the authority area over the plan period going forwards.

5. Planning Assessment

- 5.1 This section provides an assessment of the proposed development with reference to the planning policy context provided in previous sections, as well as other relevant considerations.
- 5.2 The application is submitted in outline form for up to 180 dwellings and a local shop. All matters are reserved except from the details relating to the two main access junctions on to Sodbury Road.

Location of Development

- 5.3 The application site lies to the west of existing built form, mainly residential properties, along Sodbury Road. Although the current defined settlement only adjoins part of the site (where the northern access is proposed) the actual built up area of the settlement extends southwards along this road. When the consented Linden Homes scheme is completed (PK17/4552/O and P19/5258/RM) the built form of the village to the east of Sodbury Road will extend as far south as the southern end of the application site. It is likely that the future local plan will amend settlement boundaries, that these amendments will include the consented schemes to the east of the road, and that, consequently, the application site will in future adjoin the settlement boundary along the extent of the site's eastern edge.
- 5.4 It is acknowledged that the proposals are in part in conflict with the adopted development plan by virtue of the site's location outside of the settlement boundary; where Policy CS5 limits development. However, the NPPF is clear that applications should be considered in the context of the presumption in favour of sustainable development. Where the policies most relevant to the determination of an application are out of date permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against policies in the Framework taken as a whole or where specific policies indicate that development should be restricted.
- 5.5 We consider there to be some strong arguments to suggest that key policies relevant to the determination of this application are not up to date. Whilst the Council currently claim to be able to demonstrate a 6.14 year housing land supply, as set out in the Early Extract published December 2021, we have doubts about the strength of this position with regards to;
- A number of sites within the trajectory table that do not have full permission and where there is no clear evidence provided to demonstrate delivery can be expected on site within five years;
 - The optimistic lead in times for delivery set out for many sites, both with permission and those pending determination/s106 agreements;
 - Excessive anticipated delivery rates per annum on a number of sites;

- The lack of an accompanying report to the calculation, which has the consequence of there being no explanation around the assumptions made to the supply including in relation to lead in times and delivery rates;
- The links to 'deliverability information' included within the trajectory all fail to link to any documents/information; and
- The lack of any explanation or evidence for the inclusion of 210 units per annum from 'small sites' across the supply period.

5.6 It is our view that the Council's supply is not as robust as suggested in the Early Extract, and that there is a possibility it could in reality be below 5 years. Even if the supply is above 5 years it is important for the Council to maintain a stream of developable sites going forward and to build sufficient contingency into the supply to insure that the delivery actually materialises. The adopted Core Strategy Housing requirement is for a minimum of 28,355 homes to be delivered over the plan period (2006-2027), with a residual requirement on adoption in 2013 of 22,545. To date the Council has completed just 11,396, or 50% of this. With just 6 years remaining of the plan period a minimum of 11,149 homes need to be delivered in South Gloucestershire in order to meet the requirements set out in the plan, this would mean delivery at an average rate of 1,858 for the next 6 years— an annual rate higher than anything that has been achieved in the entirety of the plan period since 2006.

5.7 Clearly there are issues around the delivery of the housing requirement within the requisite period, and the plan is not succeeding. The Core Strategy is over five years old, and has not been reviewed, in direct conflict with paragraph 33 of the NPPF which requires reviews to be completed no later than five years from adoption.

5.8 In the context of what we consider to be an overestimation of the likely five year supply figure, a lack of review to the plan within the requisite timescales set out in national policy, and given the overall housing strategy of plan has failed to deliver at the pace needed and looks to be on course to fail overall with respect to delivering the minimum housing requirement in the plan period, we consider it appropriate to deem key policies relating to the delivery of housing 'not up to date'. This would include Policy CS5, that which this proposal is in conflict with. Consequently, the weight to be attributed to conflict with this policy when undertaking the planning balance should be reduced, and the delivery of much needed market and affordable housing should be attributed significant weight.

5.9 Wickwar is a sustainable location to accommodate the development proposed. The village is within easy reach of Charfield to the north and Yate to the south, and there are a range of existing village amenities such as the Village Hall, social club, coffee shop and Inn. The site is well related to the existing and emerging built form of the village and can deliver a much needed local facility in the form of a shop. Given the above, and despite the site's location outside the settlement boundary, this is a suitable and sustainable location for the development proposed.

Quantum of Development and Effective Use of Land

5.10 The application is for up to 180 new homes, along with land for a local shop. The proposed development reflects the need to accommodate additional housing growth

within South Gloucestershire in order to achieve the minimum housing requirements of the Core Strategy. There are no technical reasons that prevent this proposed development and Wickwar is a suitable location for this additional growth which would be well related to the existing built form of the settlement. The development will make efficient and effective use of land by delivering development at appropriate densities, alongside substantial areas of open space and green infrastructure.

Affordable Housing

- 5.11 Adopted Policy CS18 of the Core Strategy requires the provision of 35% on site affordable housing. The proposed development includes affordable housing provision in accordance with the adopted Policy requirements. We will discuss and agree tenure mix with officers during the application to reach agreement regarding the most appropriate split, including with regard to the content of the First Homes Technical Advice Note (January 2022).

Public Open Space

- 5.12 The proposed development will deliver a network of attractive public open space as part of the Green Infrastructure strategy for this site as shown on the submitted Landscape Strategy Plan and Illustrative Masterplan. The proposals include;
- Natural and Semi Natural Open Space;
 - Informal Recreational Open Space;
 - Allotments; and
 - Play space including a LAP and a LEAP.
- 5.13 The Design and Access Statement provides a breakdown of the proposed quantity of each category of Open Space as defined by the local Open Space Standards. A comparison between the Policy compliant requisite quantum of each category and the proposed level of provision on site is provided. For all categories the proposed development either meets or exceeds the required level of provision, with the exception of sports provision where an off-site contribution may be required.

Access

- 5.14 As set out within the DAS and Transport Assessment submitted as part of this application, the primary vehicular access into the site will be taken from Sodbury Road via two new junctions. These junctions will lead directly onto the primary access route through the proposed development site. A system of secondary and tertiary roads linking to the main routes will provide access to the rest of the development.
- 5.15 There are a range of destinations and facilities within walking and cycling distance of the proposed development, and new pedestrian and cycle links will be accommodated within the detailed design of the site. As set out in the submitted Transport Assessment, future residents of the proposed development will be able to walk or cycle to these facilities.

Local Infrastructure

- 5.16 The proposed development includes provision for the delivery of a new local shop to serve the proposed and existing community, providing a new key community facility. The applicant has engaged with relevant prospective retail operators who have expressed significant interest in operating a new local shop in this location. Details for the delivery of this shop and future operation would be progressed once the principle has been confirmed by the grant of Outline Planning Permission.
- 5.17 Having regard to the provisions of the CIL Regulations, the proposed development will contribute to the provision of relevant local infrastructure both through the payment of CIL and through specific S106 obligations. These are covered in more detail in subsequent sections of this report but can be summarised as;
- Significant CIL payments on the total new floor space off the development;
 - 35% affordable housing which is likely to represent circa 63 on site new affordable homes;
 - Enhanced public access to the site and improved pedestrian and cycle links through the site and onto Sodbury Road; and
 - Provision of on-site open space for children's play including a LAP and a LEAP as well as informal play and additional landscaping.

Economic Benefits of Development

- 5.18 National Planning Policy contained within the NPPF requires the delivery of sustainable development, part of which is economic and relates to the concept that sustainable development means development and growth (as specifically identified in the forward to the document).
- 5.19 The economic benefits of the proposed development are significant and should be afforded due (substantial) weight in the determination of this planning application. **Paragraph 81** of the **NPPF** specifically identifies that the government is committed to ensuring that the planning system does everything it can to support sustainable economic growth, and that therefore *'significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development'*.
- 5.20 The proposed application site is a sustainable location and is available for development now. New housing in this location would help to contribute to growth in the local and wider economy of this part of South Gloucestershire. The provision of a local shop on the site would be a key benefit of the scheme and there was some local support for this mentioned in the public consultation feedback received prior to this submission (further details are set out in the Statement of Community Involvement). Both the shop and the residential development will lead to spin off benefits that will help to support the wider economic objectives of the area.
- 5.21 Some of the economic benefits of the proposed development are further summarised below:

- Potential for up to 180 new dwellings to support and create construction jobs and indirect and induced construction-related jobs over the build period;
- Net additional retail expenditure from new residents;
- 35% affordable housing, which will ensure the availability of accommodation for 'key workers' and other elements of the local labour force;
- New Homes Bonus income, plus additional Council Tax payments in perpetuity; and
- A package of S106 infrastructure contributions to mitigate impacts arising from the proposed development, but which may deliver additional benefits for existing communities.

Site Suitability and Deliverability

- 5.22 Bloor Homes are a national house-builder with the expertise and resources to ensure the timely and efficient delivery of new housing at the site; these proposals have been subject to pre-application discussion and consultation and it is hoped that the Council can therefore expediently determine this application in order that this delivery can occur.
- 5.23 The proposed development is capable of contributing to the delivery of housing in the next five year period, as well as improved community infrastructure through the proposed CIL/S106 package.
- 5.24 The site is not subject to any designations that would restrict development, nor are there any technical reasons that this proposal cannot suitably be accommodated in this location. The detailed technical assessments that have informed the proposed development are submitted to accompany this application for hybrid planning permission, as summarised further below.

Design and Layout

- 5.25 The proposals include the provision of up to 180 new homes, which will comprise a range of house types, sizes, tenures and are envisaged to accommodate a variety of household types. The final (detailed) layout will include for the provision of a quantity of self build plots in line with the level required by the Council. The application also includes for provision of a local shop, this is considered a key benefit to the local community. The details of the proposals are all reserved matters at this stage, aside from the detail of the two access junctions on to Sodbury Road.
- 5.26 An indicative scheme layout has been prepared to demonstrate that the development could be accommodate on the site in principle with a design that enables the retention of existing site features where possible and provides connectivity with the existing village. The layout shown is indicative only and has been prepared to show an example of how the site could be developed with an understanding of the constraints and opportunities and an assessment of local context. Details of this are set out in the separate Design and Access Statement which accompanies the application. The layout shows the site can accommodate this development and holistically consider the site

specific requirements including drainage, green infrastructure and landscaping to produce a layout that effectively responds to the immediate context.

Transport and Access

- 5.27 A Transport Assessment has been prepared in accordance with relevant advice and guidance. It demonstrates that the site accords with national, regional and local transport policies.
- 5.28 Two accesses are proposed for the development. The first is situated about 40m south of the junction of Sodbury Road with Amberley Way, whilst the second will be situated about 112m from the junction of Sodbury Road with Frith Lane at the location of the current field access. Both will take the form of a simple priority junction, with footways providing pedestrian access into and out of the site. Details are set out in the submitted Transport Assessment.
- 5.29 The site is accessible by sustainable modes of transport including walking, cycling, bus and rail. There is a good network of existing footways linking the site to the surrounding area and a range of local facilities are within acceptable walking and cycling distances.
- 5.30 Junction modelling shows that the level of traffic associated with the proposed development will not adversely affect the safe operation of the surrounding highway network for the proposed access junctions as well as the Sodbury Road/Amberley Way mini roundabout, Junction capacity improvements are required at the junction of the High Street/The Downs/Station Road.
- 5.31 It is concluded that the proposed development accords with national and local transport policy and there is no transport or highway reason why planning permission should not be granted.

Landscape and Visual Impact Assessment

- 5.32 A detailed landscape and visual appraisal accompanies the planning application. The purpose of this LVA is to identify the baseline conditions of the site and surrounding area and to determine those landscape and visual characteristics that might inform the design of the development proposals, including recommendations for mitigation. It then provides an assessment of the landscape and visual effects predicted to arise from development on the site with reference to the baseline analysis.
- 5.33 Whilst the character and use of the site would change from agricultural land to residential built form, the proposals retain and enhance (where possible) the existing landscape fabric of the site and incorporate areas of new open space, whilst assimilating the site within its urban context.
- 5.34 Changes to the visual amenity would be experienced within close proximity of the site by residential receptors, local PRoW users and users of the local minor road network, however these changes would be experienced in the context of the recently extended urban context south Wickwar with mitigation measures in place to protect amenity. Beyond the 700m radius, changes to the visual amenity of receptors using PRoW and network of roadways are limited due to the intervening level topography and cumulation of field boundary vegetation, where views are available these are

experienced as part of a much wider landscape and viewed against the context of other built form.

- 5.35 The LVA confirms that the Framework Masterplan for the site would represent a sensitively designed, landscape led approach to address concerns of the site in relation to landscape and visual amenity matters to ensure that the scale, form and appearance of the development would reflect and enhance the positive characteristics of the site's local context.
- 5.36 The conclusion is that the proposed development should be considered an acceptable extension to the existing settlement of Wickwar, which would not cause significant wide-ranging adverse effects upon its surrounding landscape context.

Ecology

- 5.37 To establish the ecological baseline of the Application Site and subsequently inform a new outline planning application for residential development, a desk study, Extended Phase 1 Habitat survey and further detailed surveys for bats, breeding birds, badger (*Meles meles*) and great crested newt (*Triturus cristatus*) have been completed by EDP and the results are included in the submitted Ecological Appraisal.
- 5.38 With respect to habitats onsite, the Application Site comprises several agricultural fields, represented by arable crop and improved/poor semi-improved grassland of limited ecological importance, whilst the boundaries of the Application Site and internal field boundaries are delineated by native hedgerows of importance at the Local level. Such habitats are considered suitable for a local bat assemblage, breeding birds, badger, great crested newt, common reptiles and notable mammals. Of particular pertinence, a small great crested newt population was identified in association with offsite ponds.
- 5.39 The Application Site is located within 670m of Bishop's Hill Woods Site of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI) and within 1.18km of Lower Woods SSSI. The tributary of Ladden Brook SNCI is also located 210m west of the Application Site.
- 5.40 Accordingly, EDP has contributed to the design of the indicative masterplan. Specific proposals for the avoidance, mitigation and compensation of any predicted impacts include, where possible, the retention, protection and enhancement of those features of greater ecological importance. This is in addition to the inclusion of open green space within the development to be managed for both biodiversity and recreation, and additional landscape planting. Further specifications regarding sensitive working methodologies and best working practices during the construction phase will also be incorporated to avoid impacts upon retained habitats and ensure the avoidance of harm/injury and disturbance to protected species present/potentially present.
- 5.41 Provided those recommendations in respect of mitigation and sensitive working methodologies are implemented, it is considered that the proposals could proceed lawfully and in line with planning policy requirements.

Heritage

- 5.42 A Heritage Impact Assessment has been written by EDP in order to assess the potential for impacts on the historic environment from the development of the application site. The assessment finds that the proposed development will not result in any direct impacts upon any designated heritage assets, such as scheduled monuments, listed buildings, registered parks and gardens, world heritage sites, registered battlefields or conservation areas, that would potentially constrain its development.
- 5.43 The assessment concludes that only a single designated heritage asset will be affected, comprising the Grade II listed building South Farmhouse. The Site's development would result in a very minor degree of 'less-than-substantial harm' to the setting of this Grade II listed building. This impact would be due to a change in character of part of its historically and functionally associated farmland setting. There are substantial public benefits of the proposed development that would outweigh the very minor degree of harm to the setting of this listed building (designated heritage asset).

Archaeology

- 5.44 The archaeological assessment does not identify any potential for highly significant remains within the Site that might require preservation in situ. Other remains of lesser significance could be archaeologically recorded prior to their loss (if deemed desirable by South Gloucestershire Council's planning archaeologist) in accordance with a scope and methodology, following standard archaeological best practice guidance, agreed in advance with the planning archaeologist. As such, if archaeological remains are found to be present in the Site, they would not constrain its development as proposed.

Flood Risk and Drainage

- 5.45 A comprehensive Flood Risk Assessment has been undertaken to accompany this application, the conclusions from which are set out in the following paragraphs.
- 5.46 The site is within Flood Zone 1. This is regarded as a low risk in accordance with EA guidance. The greatest flood risk posed by the development to off-site areas is from potential for increased surface water runoff from impermeable areas. However, this will not occur as the proposed Drainage Strategy will intercept all surface runoff and discharge the flows appropriately.
- 5.47 Groundwater flood risk during construction will be mitigated by the relevant contractor health and safety procedures for working in confined spaces and below ground level should be in place. In extreme cases, dewatering/pumping may be required to remove any groundwater present.
- 5.48 Runoff from all impermeable areas will discharge through separate adoptable surface water sewers via outfalls into an attenuation basin, designed to attenuate flows produced by a 1 in 100 year + 40% Climate Change event with an attenuation volume of 4089m³. The basin is proposed to discharge surface water into the nearby tributary of the Ladden Brook, via an adoptable surface water flow control chamber limiting discharge to a maximum discharge rate of 25l/s.
- 5.49 Foul water flows will drain via a network of adoptable foul water sewers to an adoptable pumping station at the north-west of Phase 1. This will subsequently pump foul water flows east to the nearest public foul sewer to the site on Sodbury Road

(B4060) adjacent to the sites eastern boundary subject to capacity checks with Wessex Water.

- 5.50 The Flood Risk Assessment has adequately assessed flood risk to the development, as well as considered the potential increase in risk as a result of climate change over the lifetime of the development. Additionally, flood risk to elsewhere as a result of development has been assessed and measures have been recommended to ensure risk does not increase and will be improved where possible. The FRA outlines mitigation and management measures that should be undertaken to ensure that all vulnerable receptors to flooding will be safe during significant fluvial events.

Sustainable Design and Construction

- 5.51 This application is accompanied by an Energy and Sustainability Strategy Statement that has undertaken an assessment of the sustainability criteria of the proposed development.
- 5.52 Local Planning Policy for the development requires that demand reduction measures are implemented to achieve an improvement of 20% carbon from renewables, over Part L1A 2013 standards.
- 5.53 Provisional SAP assessment of the typical house types that Bloor Homes would propose at the detailed design stage demonstrates that baseline Part L compliant emissions for the development will be 250911 kgCO₂ per annum, with an energy demand of 1283883 kWh per annum.
- 5.54 From this baseline, further energy demand reduction has been prioritised as part of the widely supported 'fabric first' approach. The benefits to the resident of this approach have been discussed in detail in the Statement, which includes an improvement in thermal comfort, lower energy bills, reducing the risk of fuel poverty and minimal maintenance requirements. These benefits are realised alongside the crucial aspect of the long-term reduction in energy demand that is built into the lifetime of the dwellings.
- 5.55 Applying this approach through a combination of the fabric specification proposed, detailing to avoid thermal bridging, reducing air leakage and employing passive and active design measures, the dwellings will secure a saving in CO₂ emissions of 12028 kgCO₂/year, equating to an energy demand reduction of 66020 kWh/year. In order to meet the 20% carbon from renewables requirement, a further 47777 kg CO₂ will need to be offset, which is achieved through the strategy set out in the statement.
- 5.56 The energy statement determines the feasibility of a range of LZC technologies. The development will apply 157kWp Solar PV in order to meet local authority planning policy, providing a 143420kWh energy and 50421 kgCO₂ carbon reduction.
- 5.57 The proposed strategy would provide a 24.89% carbon reduction over a development built to comply with the CO₂ targets under the latest revision of the Building Regulations, Part L1A 2013. This also represents a 11.17% reduction in the energy requirements of the site, provided by renewables.

Arboricultural Impact

- 5.58 A Stage 1 and 2 Arboricultural Impact Assessment has been prepared and submitted with this application. A site survey has been undertaken and a total of 23 individual trees, four groups of trees and 13 hedges were recorded. The most prominent individual trees grow internally within the boundary. Of the 23 individual trees recorded: one was Category A; nine were Category B; 10 were Category C and two Category U. Of the four groups recorded: two were Category B and two were category C.
- 5.59 The majority of trees recorded grow internally within the agricultural site, the fields are separated by hedges and within these boundary hedgerows are the majority of the trees. However, G1 and T1 are situated on the eastern boundary and can be viewed from the adjacent public footpath and road. T1 is a mature Ash tree that is situated outside the survey area in a residents garden which is a dominant tree when viewed from the roadside. G1 are a small group of Willow trees that act as a screen for the internal setting of the farm, both are category B class.
- 5.60 Tree T20 is an over mature category A Oak set within a boundary hedgerow and can be regarded as one of the best trees within the site due to its large diameter, old age and intrinsic conservation qualities.
- 5.61 Trees T4, T12-15 and T23 are category B class trees situated internally within boundary hedgerows. The species are predominantly Ash, one Oak and a Horse chestnut. The three Ash trees are varied in quality with large diameter stems and established regrowth from historical pollarding with good habitat value. The Horse Chestnut is young but perfectly formed and could contribute to the site for many years to come. The Oak is large in size and a dominant tree contributing well to the local landscape.
- 5.62 The remaining trees are category C class and are situated within the boundary hedgerows, these trees do contribute to the site however they are of little arboricultural merit.
- 5.63 All hedgerows are well maintained by the landowner and are predominantly Hawthorn species which provide a good screen and numerous ecological benefits. These are also of value when considering the rural location, and they contribute well to this.
- 5.64 The proposed development will require partial removal of one group (G1) to facilitate its implementation which equates to two Willow trees. This group has direct impact with the proposed northern main site access and there will be some minor loss of screening from the site to the public road.
- 5.65 Trees T18, T19 and H10 all have direct impact with the southern access. The loss is negligible as the trees are category C and U with limited life expectancy and poor form. The partial removal of the hedge is the northern end section, so no gaps will be created from the removal.
- 5.66 The majority of the remaining trees can all be retained and protected to their full root protection area providing adequate tree protection is in place.

- 5.67 Whilst the proposed development will require the removal of a small amount trees the retention of the most significant trees and groups has been accommodated where possible. Additionally, where trees are to be retained there is a low likelihood of them being impacted by the proposed development. To mitigate the tree removals that will occur on the site, new tree and landscape planting will be undertaken as part of the development. This will ensure that the site benefits from a sustainable long-term treescape and that losses caused by development are mitigated.

Noise

- 5.68 Armstrong LLP has carried out a noise assessment to accompany this planning application. Measured on-site noise levels have been input into the 3D noise model SoundPLAN, which has been used to calculate road traffic noise across the development site and at proposed receptors. Without mitigation measures, the assessment indicates that there is potential for proposed dwellings closest to Sodbury Road to experience an adverse effect due to road traffic noise.
- 5.69 An assessment of noise from the dairy farm in accordance with BS4142 has been undertaken and has shown that associated activities exceed the background noise levels, and will cause a significant adverse impact at some areas of the development with no mitigation.
- 5.70 Therefore, mitigation measures have been suggested to reduce the impact of road traffic noise and existing industrial noise at proposed dwellings.
- 5.71 In outdoor living areas, gardens adjacent to Sodbury Road and the dairy farm could be located on the screened side of dwellings, to adequately protect garden areas from road traffic and industrial noise. Alternatively, should garden areas be placed facing Sodbury Road, a 1.8m high close boarded fence should be utilised.
- 5.72 For internal living areas, internal noise levels will be met with standard double glazing and an alternative means of ventilation, for those receptors adjacent to Sodbury Road and the dairy farm.
- 5.73 Mitigation requirements can be confirmed as a reserved matter, on a plot-by-plot basis, once a detailed design layout is available.
- 5.74 In accordance with the National Planning Policy Framework (NPPF) and Planning Practice Guidance – Noise (PPG-Noise), the noise assessment has demonstrated that adverse noise impacts can be addressed with suitable mitigation. Any significant impacts at the development would be avoided and reduced to a minimum. When considered in accordance with the Noise Policy Statement for England (NPSE), the potential noise impact, the proposed development is below the Lowest Observed Adverse Effect Level (LOAEL).

6. Planning Obligations – Draft Heads of Terms

- 6.1 South Gloucestershire Council has implemented the charging/collection of CIL from March 2015, the latest update was March 2021, and development approved (granted planning permission) will be liable to make the payment. The following draft S106 Heads of Terms are based on relevant adopted and emerging policy and it is expected that these obligations will be refined during the course of the determination of the planning application, including (where relevant) confirmation that any obligations do not duplicate matters covered by the CIL payments that will be made, and ensuring that relevant evidence based justification is provided to confirm that obligations are necessary and reasonable in all respects.

CIL Payment

- Based on the indicative proposed scheme and the CIL rate of £80sqm (for the residential development only) a total CIL payment of some approximately **£1.5million**. The fee has been calculated on circa 18,500sqm of liable floor space.

Affordable Housing

- **35%** of total dwellings to be provided as affordable housing;
- Unit and tenure mix to be agreed with the Council.

Local Shop

- **0.15ha** land parcel for a local shop.

Transport and Access

- **Travel Plan** measures, as set out in Draft Travel Plan.

Public Open Space

Children's Play and Sport/Recreation

- On site open space and play provision, in accordance with SGC policy requirements.
- Off-site contribution to sports provision.

Allotments

- On-site allotment provision, in accordance with SGC policy requirements.

7. Summary and Conclusions

- 7.1 The application site at Sodbury Road, Wickwar is suitable for the proposed development of up to 180 new homes and provision of a new local shop to serve the community. The application proposal will deliver high quality housing in a context where the current adopted plan is in danger of failing to deliver the minimum housing requirement over the plan period. The various technical assessment documents that are submitted in support of the planning application demonstrate that this site can accommodate this development suitably and sustainably. This application is in outline only, with all matters reserved except primary access points, however the information submitted demonstrates that the proposals can come forward with an integrated approach to securing an economically, socially and environmentally sustainable development.
- 7.2 It is acknowledged that the proposals are in part in conflict with the adopted development plan by virtue of the site's location outside of the settlement boundary where Policy CS5 limits development. However, the NPPF is clear that applications should be considered in the context of the presumption in favour of sustainable development. Where the policies most relevant to the determination of an application are out of date permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against policies in the Framework taken as a whole or where specific policies indicate that development should be restricted.
- 7.3 We consider there to be some strong arguments to suggest that key policies relevant to the determination of this application are not up to date. It is our view that the Council's supply is not as robust as suggested in the Early Extract, and that there is a possibility it could in reality be below 5 years. There are issues around the delivery of the housing requirement within the requisite period, and the plan is not succeeding. Unprecedented rates of annual delivery would be needed for the remainder of the plan period in order to deliver the minimum requirement by 2027. The Core Strategy is over five years old, and has not been reviewed, in direct conflict with paragraph 33 of the NPPF which requires reviews to be completed no later than five years from adoption.
- 7.4 The weight to be attributed to conflict with policy CS5 when undertaking the planning balance should be reduced, and the delivery of much needed market and affordable housing should be attributed significant weight.
- 7.5 The proposed development will secure compliance with key aspects of extant Development Plan policy in respect of various important development management matters.
- 7.6 The proposed development has had regard to all relevant environmental factors during its evolution and this is reflected in the final proposed design, including ecology and habitats, landscape and historic context and design. There are no environmental or technical constraints to developing this site which is well located on the edge of the existing settlement, and which is otherwise suitable for residential development.

- 7.7 A package of financial and other relevant contributions will be agreed between Bloor Homes and South Gloucestershire Council as part of determining this application, to address infrastructure and other matters relevant to achieving sustainable development for the village, including the liability of the development to pay CIL.
- 7.8 Paragraphs 38 onwards within the NPPF specifically deal with Decision Making confirming that:
- *“Local planning authorities should approach decisions on proposed development in a positive and creative way”; and*
 - *“Decision-makers at every level should seek to approve applications for sustainable development where possible”.*
- 7.9 When considered against the Development Plan and the NPPF the benefits of the scheme clearly outweigh any residual negative impact and there are no up to date policies to indicate that development should be resisted in this location. As such, and in accordance with NPPF paragraph 11, this application should be approved “without delay”.

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